

## EST – Modern Slavery Statement 2018/19 (the ‘MSA Act’)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes European Study Tours slavery and human trafficking statement for the financial year ending 31 August 2019.

At European Study Tours, we believe that our guests and employees should grow, learn and have fun together. The information below demonstrates our responsibilities to our employees, customers, contractors, suppliers and partners in working to achieve this.

### 1. Our Policies:

The following policies are in place and form a part of European Study Tours approach to the identification of modern slavery risks and describe the steps we will take to prevent slavery and human trafficking:

- **Anti-Slavery and Human Trafficking Policy**

We specify our expectations for all contractors, suppliers and other business partners including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

- **Purchasing Policy**

Our purchasing policy requires all high risk suppliers to use an Auditing process as part of working towards adherence to the MSA Act.

- **Anti-Bribery & Whistleblowing policy**

We actively encourage all workers, customers and other business partners to report any concerns related to the direct activities or supply chains of European Study Tours. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Agency Staff Policy**

Where agency labour is required, we use only specified, reputable employment agencies to source temporary labour and always verify the practice of any agency before accepting workers from that agency.

- **Training and Awareness**

Staff who have the responsibility for selecting, contracting or monitoring the performance of a supplier are aware of their responsibilities.

### 2. Action Already Taken:

In addition to the policies above, the company has taken a number of steps following the introduction of the MSA Act:

- Identified at operational, leadership and board level our internal governance structure on Modern Slavery and Human Rights.

- Established a process by which to assess the risk from those who supply accommodation, restaurant or transport services. European Study Tours has written to all suppliers highlighting our requirements in this matter and requested copies of suppliers MSA policies where they exist. We have had confirmation from all of our accommodation providers and our transport providers in this matter.

- All supplier contracts (goods and services) have been updated to include reference to the preventing of slavery and human trafficking. In addition our MSA policy has been included as part of our annual coach suppliers conference.

- Ensured all potential new suppliers of services to European Study Tours are now subject to the same due diligence when assessing their suitability.

- Our due diligence system ensures all suppliers ‘MSA Act compliant status’ is logged and held centrally. The performance is then reviewed annually as part of each year’s contract negotiations and/or audit program.

- All staff who have responsibility for selecting, contracting or monitoring the performance of a supplier has completed awareness training and been briefed on the MSA Act and our approach to reducing the risk.

- We have had confirmation from 100% of our suppliers around their understanding of our requirements in this area of the supply chain and receive signed acceptance and/or copies of their own MSA policies by December 2017.

### 3. Future Action Planned:

- Through our internal Group Leader Questionnaire (GLQ) feedback system we will encourage customers to feedback where they highlight concerns in respect of slavery or human trafficking.

### Board Approval:

**This statement has been approved by the Company’s Board of Directors, who will review and update it annually.**

Director’s signature:



Date: 01/09/2018