

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. COMMITMENT TO A WORK ENVIRONMENT FREE OF SLAVERY AND NO HUMAN TRAFFICKING

JTB maintains and promotes a corporate culture and behavior in which honesty, integrity and respect for the law are viewed as essential to achieving its desired success. We therefore require all staff at all times to act honestly and with integrity.

JTB HAS A ZERO-TOLERANCE APPROACH TO MODERN SLAVERY AND WE ARE COMMITTED TO ACTING ETHICALLY AND WITH INTEGRITY IN ALL OUR BUSINESS DEALINGS AND RELATIONSHIPS AND TO IMPLEMENTING AND ENFORCING EFFECTIVE SYSTEMS AND CONTROLS TO ENSURE MODERN SLAVERY IS NOT TAKING PLACE ANYWHERE IN OUR OWN BUSINESS OR IN ANY OF OUR SUPPLY CHAINS. WE EXPECT THE SAME HIGH STANDARDS FROM ALL OF OUR CONTRACTORS, SUPPLIERS AND OTHER BUSINESS PARTNERS.

This Policy applies to all persons working for JTB or on our behalf in any capacity, including all Employees, whether permanent or temporary, as well as to the extent provided for below, to all “Associated Persons ¹” and their directors, officers and employees (herein collectively the “**JTB Representatives**”).

2. DEFINITIONS

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking.

¹ An “Associated Person” includes any individual or company that acts on behalf of JTB or otherwise performs any services for or on behalf of JTB. A typical example is a sales agent, intermediary or introducer, but this can also include, for example, advisers, consultants, contractors, joint venture partners and controlled or non-controlled subsidiaries of JTB.

This Policy aims at tackling **the following types of irregularities** which could threaten the resources or the reputation of JTB:

“Slavery” (in accordance with the 1926 Slavery Convention) is defined as:

“The status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised.”

“Servitude” is defined as:

“The obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition.”

“Forced or Compulsory Labor” (as per ILO’s Forced Labour Convention 29 and Protocol) is defined as:

“All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.”

As per the Modern Slavery Act 2015 (UK), an offence of **“human trafficking”** requires that a “person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.”

“Child labor” is defined as:

“Works that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.” Whether or not particular forms of “work” can be called “child labor” depends on:

- The child’s age,
- The type and hours of work performed,
- The conditions under which it is performed, and
- The policies held by each individual country.

Child labor is defined by international standards as children below 12 years working in any economic activities, those aged 12-14 engaged in more than light work and all children engaged in the worst forms of child labor (ILO).

The “**worst forms of child labor**” are very likely to constitute modern slavery and are defined by article 3 of ILO Convention No. 182 as:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

It is enshrined in the Code that JTB and all JTB employees do not participate in any form of forced or child labor. This Policy aims to further elaborate on that principle and what constitutes these actions.

3. SLAVERY AND HUMAN TRAFFICKING PREVENTION ACTIONS

In response to the threat of Slavery and Human Trafficking, JTB has issued this Policy, which defines modern slavery, allocates responsibilities for all employees, including management, and explains how to report suspicions of Slavery and Human Trafficking.

4. JTB REPRESENTATIVES’ RESPONSIBILITIES

JTB Representatives must have the highest standards of honesty and integrity in the exercise of their duties. As outlined in the Code, each individual JTB Representative is personally obliged to comply with applicable laws, local rules and regulations as well as with internal regulations and guidelines applicable to their jurisdiction and/or area of activity.

All JTB Representatives are responsible for:

- A. Respecting the principles and provisions of Slavery and Human Trafficking Laws; and

- B. Reporting details of any suspected slavery or human trafficking activities performed either within JTB or through JTB's contractors, suppliers or other business partners.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. REVIEW OF POLICY IMPLEMENTATION

JTB will monitor its obligations regarding Slavery and Human Trafficking Laws in all countries where it does business. The proper implementation of this Policy and subsequent procedures will be reviewed annually, where applicable.

7. COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this Policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify your manager or the management as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or any tier of our supply chain at the earliest possible stage in accordance with our internal Whistleblowing Policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the management. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. JTB is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Revision History

Version	Detail	Date
1.0	Newly developed	2019/9/13
2.0	Updated in accordance with reestablishing JTB Group Policy	2023/4/1