



Maverick Topco Limited (trading as Riviera Travel)
SLAVERY AND HUMAN TRAFFICKING STATEMENT October 2022

1. Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015 and outlines how the Company proactively manages and assesses its own operations alongside our suppliers to protect workers from being abused and exploited in our own Company and our supply chain.

2. Responsibility

Whilst it is every employee's responsibility to be aware of and highlight any areas of potential risk, overall responsibility for ensuring that the Company, its associated organisations and supply chain are compliant in relation to the Modern Slavery Act 2015 lies with the Chief Executive Officer.

3. Business Structure

Our core business is the organisation, administration and provision of worldwide escorted tours, ocean and river cruises. Our head office is based at New Manor, 328 Wetmore Road, Burton-upon-Trent, DE14 1SP where all our central functions (Sales & Marketing, Operations, Product, Finance, Technology, HR, Customer Service and Contact Centre) are located, employing approximately 200 staff (this number can increase and decrease according to seasonal fluctuations).

We also utilise the services of self-employed Tour Managers and Cruise Directors who are located throughout the world and these number some 300. In 2022 we engaged a third party, MPL Contact Limited ("MPL") to manage overflow inbound calls to our Contact Centre. MPL is based in Nottingham, UK. There are currently around 20 agents fully engaged on our account, managed partially by team leaders employed by MPL, with oversight from Riviera team managers.

4. Supply Chain

Our supply chain includes the sourcing of accommodation & transport services, either directly or via a local Destination Management Company (“DMC”) in each country we operate in. With respect to DMCs we ensure that these are long-established and/or multi-country entities with robust working practices - however, they neither own nor directly operate the hotels or transport used.

Typical workers within the supply chain will include those in the travel sector, such as self-employed tour managers and cruise directors who are geographically dispersed. The supply chain also includes employees and contractors of the partners we engage to provide and operate our cruise ships. We work with a wide network of hoteliers, ranging from multinational corporate providers to local area independents. Our supply chain will also include a large network of travel agents and other commercial partners who broker sales and market our product. These suppliers will have a range of employment practices in accordance with their location, scale and the type of role they are engaging.

5. Trading & Operations 2020-2022

Riviera Travel’s business operations were halted abruptly in early 2020 because of the outbreak of the Covid pandemic, with all trips cancelled for a prolonged period. The company was forced to reduce its directly employed workforce through redundancy and furlough. Similar impacts will have been felt throughout the wider supply chain.

Operations were briefly resumed in the latter part of 2021, only to be halted again with the outbreak of the Omicron variant. In early 2022, preparations were finally able to move forward to work towards being fully operational, with the first trips resuming in Spring 2022.

As has been widely publicised in the UK media, since resuming operations, the travel industry across the country has faced significant challenges. One of the biggest being the scramble to refill roles and a shortage of talent, with large numbers of ex travel sector employees making the decision not to re-join the sector, a reduced pool of European workers and a general shift in attitudes to work resulting from the pandemic.

We are mindful of the increased risk of less robust recruitment practices during times of critical staff shortages and a limited candidate pool. We retain a multi-stage recruitment and selection process for our vacancies, including the use of agency vetting where appropriate to counter this.

6. Policy

We are committed to social and environmental responsibility and have zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provision of the Modern Slavery Act 2015.

We recognise that modern slavery is a complex supply chain issue and we work in partnership with our customers, suppliers and other organisations to sustain long-term solutions to this issue.

We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

In 2022 we will update our Modern Slavery policy and provide awareness training for our employees. The need to do this now is particularly important given that there has been a significant influx of new joiners to the business in the last 12 months.

7. Due Diligence in our Supply Chain

7.1 Risk Assessment

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures as well as the controls built into our business operations and the knowledge and skills of our staff. We assess risk based on a number of factors including geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and levels of political stability.

Given that the vast majority of our employees are based in our Burton office, we consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control. As identified earlier in this statement, we consider that the risk of slavery and human trafficking may have increased in our supply chain as a result of the scarcity of workers and increased vacancies combined with the uptick in demand for holidays.

7.2 Due diligence

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- We undertake all reasonable and practical steps, including accommodation inspections and audits, to ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes;
- We expect each entity in the extended supply chain to at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain;
- It is a contractual requirement for our hotel suppliers to comply with relevant legislation in relation to modern slavery and to comply with the Company's standards. Failure to do so may result in termination of the supplier agreement;
- Our suppliers are required to sign a declaration of their adherence with the requirements of the Modern Slavery Act 2015 and Riviera's expectations. We are currently reviewing our process with a view to implementing a standard, robust approach for new and existing suppliers;
- Many of our suppliers are strictly regulated and audited on a regular basis. There are regular inspections by the police onboard the ships we use. These inspections are specifically in relation to working conditions;
- For some countries, accommodation & transport services are obtained via a local Destination Management Company (DMC). With respect to DMC's we ensure that these are long-established and/or multi-country entities with robust working practices - however, they neither own nor directly operate the hotels or transport used.

8. Involvement in Modern Slavery

Since the last statement was published, we have not been made aware of any concerns or potential issues from anywhere within our supply chain. Should we be made aware of any potential instances or issues, we will assess them on a case-by-case basis and will consider appropriate action.

Should our investigations identify a breach of our requirements or those of modern slavery legislation, or treatment of workers which falls short of our expectations, we would investigate the situation thoroughly and engage external agencies if appropriate. We will only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies or our moral obligations are discovered and those issues are not addressed in a timely manner.

9. Training & Awareness

We will ensure that we have competent individuals within our Company who are aware of the standards we require and are able to provide guidance and support to all employees to ensure they have an understanding of the expected behaviour from both our Company and that of our supply chain.

10. Key Performance Indicators

In the next review period we are committed to the following:

1. Reviewing and updating our Modern Slavery Policy
2. Raising awareness of the risks of slavery and human trafficking amongst our employees by communicating our revised policy and undertaking relevant training
3. Rolling out awareness training to our self-employed tour manager and cruise director population
4. Creating a clear process for raising concerns and encouraging it's use

Over the course of the next year we will look to identify further actions to support our supply chain due diligence.

We will report on progress in relation to these commitments in our next statement.

11. Whistleblowing

We encourage anyone who has a concern to raise it in the first instance with their Riviera contact.

We have in place a Whistleblowing Policy which is applicable to employees, contractors, suppliers and other partners to Riviera Travel where this is not possible, for whatever reason.

12. Review

This statement will be reviewed annually, unless circumstances dictate that it should be reviewed and/or renewed more frequently.

13. Authorised Signatory

This statement is approved by Phil Hullah, Chief Executive Officer, Riviera Tours Limited (trading as Riviera Travel).

Signed:

A handwritten signature in black ink, appearing to be 'PH', written over a light grey circular watermark.

Dated: 20th October 2022