

CHANGE



(/)

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# LEGAL AND PRIVACY POLICY

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Lotus Group companies are committed to acting ethically and observing all of the laws of the United Kingdom in relation to slavery, servitude, human trafficking and forced or compulsory labour, which may come under the heading “modern slavery” and in particular the Modern slavery Act 2015 (The Act). It also takes a zero tolerance attitude to any customer or supplier which may at any time be found to be, or suspected of, contravening those laws. The Group has a policy of adhering to the local laws of any jurisdiction in which it may do business but, as a minimum benchmark, will consider the laws, practices and social norms of the UK as being the guiding principal.

### Responsibility

The board of Directors has overall responsibility for ensuring this policy is observed by all of those under its control. Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy.

## Internal Compliance

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All staff must ensure that they have read and understand the policy. The recognition of the various aspects of modern slavery should be encouraged at all levels, whether on the client or supplier side of the business. It should be clear that any activity which may lead to or to suggest a breach of this policy is to be avoided.

The reporting of any concerns regarding any aspect of modern slavery which may arise in the course of business should be immediately raised at director level. Staff are encouraged to raise genuine concerns even if they turn out to be mistaken. All protections under our “whistle blowing” policy will apply where concerns have been raised in good faith.

Training on this policy and of the legal and reputational risk our business faces with respect to modern slavery will be provided as necessary.

### Supplier Compliance

The group has a zero tolerance policy with any supplier who may be involved if Modern Slavery in any of its forms, or which has suppliers or contractors who may have such involvement.

Our supplier contracts include conditions, as specified in The Act, that they will not be involved in Modern Slavery in any of its forms and will furthermore that they will have a zero tolerance policy towards any of their suppliers or subcontractors who may have such involvement.

As a Travel Agent / Tour Operator with global coverage and many thousands of hotels and other ground product suppliers worldwide, a monitoring of or auditing of suppliers for compliance would not be possible. The Group does however make every effort to ensure that the third parties with which it contracts are of the most responsible and highest standard of integrity in their field.

### Client Compliance

The booking staff should try to be aware of any unusual travel arrangements which may give rise to concerns that trafficking, or other aspects of Modern Slavery, may be occurring. Any suspicions should be raised at director level and, if the suspicion is seen to be serious enough, reported to the appropriate legal authorities. As almost all travel itineraries booked by the group start from within the UK, the directors consider the business to be at low risk of use by persons involved in modern slavery and trafficking.

### Breaches of Policy

Any employee who knowingly and wilfully breaches this policy will be deemed to have committed serious misconduct and will face disciplinary action which could lead to dismissal for gross misconduct.

If any supplier found to be incontrovertibly in breach of this policy the Group will terminate the relationship until such time as they become compliant. Any gross breach may be reported to the appropriate legal authorities.



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To date the companies within the group have identified no instance where a suspicion that the Modern Slavery act may have been contravened, has been raised. The directors are of the opinion that the nature of the business makes the likelihood of such instances particularly low.

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The Lotus Group of companies includes Lotus Group Ltd, Lotus International Ltd, Lotus Travel Ltd, Lotus Leisure Ltd, Make My Day Better Ltd (Registered Charity)

This policy was approved by the Board of Lotus Group and signed by John Phelps, Director on 31/03/2019

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