

## Transferfix Modern Slavery Policy

### Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2 Europe Holidays Lda recognises that, as a commercial organisation, it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. 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 that of our suppliers.

Also, we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our employees, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels.

### Responsibility for the policy

The Executive has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and to see that all those under our control comply with our policy.

The General Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers, at all levels, are responsible for ensuring those reporting to them understand and comply with this policy and that personnel are provided with adequate and regular training on the matter of modern slavery.

### Compliance with the policy

2 Europe Holidays Lda ensures that our employees, suppliers and other business partners 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. Employees and suppliers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify the manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains, of any supplier tier, at the earliest possible stage.

If employees 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, they must raise it with the line manager or General Manager.

In good faith, we aim to encourage openness, and we will support anyone who raises genuine concerns under this policy, even where they turn out to be mistaken. We are 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, they should inform the General Manager, at the earliest opportunity.

### **Communication and awareness of this Policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery shall be communicated to all suppliers and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. This policy is published on the company website.

### **Breaches of this Policy**

Any breach of this policy shall be investigated internally. The company reserves the right to seek legal advice. Where an employee is found to be in breach of this policy, the employee shall face disciplinary action. This might result in dismissal for misconduct and where appropriate, the matter shall be passed to law enforcement.

We may terminate our relationship with other individuals and organisations working on our behalf where there is a breach this policy.

### **Policy Approval**

This policy has been approved by the executive of 2 Europe Holidays Lda .

Annually, the Executive shall review and update the policy.