



## **Ethical Trading, Sustainable Procurement, Modern Slavery & Anti-Bribery Policy**

arrangeMY is committed to conducting business ethically, responsibly, and transparently. We operate in full compliance with all applicable laws and regulations and apply a zero-tolerance approach to modern slavery, human trafficking, bribery, corruption, fraud, and unethical business practices.

This policy reflects our commitment to internationally recognised standards, including:

- UK Modern Slavery Act 2015
- UK Bribery Act 2010
- Ethical Trading Initiative (ETI) Base Code
- Ethics, Labour & Human Rights, and Sustainable Procurement criteria

This policy applies to:

- All arrangeMY employees, directors, and temporary workers
- Contractors, agents, intermediaries, and business partners
- All suppliers and subcontractors throughout the supply chain

Compliance with this policy is a condition of doing business with arrangeMY.

### **Ethical Labour & Human Rights Standards**

arrangeMY adopts the ETI Base Code of Labour Standards and requires equivalent standards across our supply chain.

#### **Employment is Freely Chosen**

- No forced, bonded, involuntary, prison, or trafficked labour
- Workers must not lodge deposits or surrender identity documents
- Workers are free to leave employment after reasonable notice

#### **Working Conditions are Safe and Hygienic**

- Safe and hygienic working environments
- Effective health and safety systems and training
- Clean, safe accommodation where provided

#### **Child Labour Shall Not Be Used**

- No exploitative child labour
- Workers under 18 must not perform hazardous or night work
- National minimum age laws must be met or exceeded

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National Living Wages are Paid – as of (gov.uk 2026).

- Wages meet or exceed national legal or industry benchmark standards
- Workers receive clear, written information on wages and conditions

Working Hours are Not Excessive

- Working hours comply with national laws and industry standards

No Discrimination

- No discrimination based on race, nationality, gender, age, disability, religion, marital status, sexual orientation, or political affiliation

No Harsh or Inhumane Treatment

- No physical punishment, abuse, intimidation, harassment, or coercion

Grievance mechanism in the supply chain, available to the supplier

- In the event of supply chain workers having a grievance, issues can be escalated to our Supplier Relationship Manager – Kim Henstock, [kim.henstock@arrangemy.com](mailto:kim.henstock@arrangemy.com).

Supplier Relationship Management will be at the discretion of arrangeMY and the needs of the business, in the event of a dispute, arrangeMY agrees to mediate and resolve issues in the first instance, rather than terminate contracts.

Supply chain KPI metrics for supplier evaluation as of 2026 will have a minimum participation % of:

**Hotel Accommodation – 70%**

**Rail – 50%**

**Air Suppliers – 60%** as detailed in the 2026 arrangeMY Environmental and Sustainability Report.

## **Modern Slavery & Human Trafficking**

*(UK Modern Slavery Act 2015)*

arrangeMY acknowledges its responsibility to prevent modern slavery and human trafficking within its operations and supply chains.

Commitments

We will:

- Act ethically and with integrity in all business relationships
- Maintain transparent supply chain practices
- Take a proactive approach to identifying and mitigating risks of modern slavery

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## Due Diligence & Risk Management

arrangeMY applies risk-based due diligence including:

- Pre-approval supplier ethical, labour, and legal compliance checks
- Ongoing monitoring where risk is identified
- Audits and corrective action requirements where appropriate – resolution to be the first approach to seek suitable mediation.
- Suspension or termination of suppliers for serious or unresolved breaches
- Investigations, audits and risk assessments to be carried out periodically to ensure that no employees are acting unfavourably.
- Supplier Expectations
- arrangeMY agrees to continually monitor and assess risks within our supply chain that cover: Supplier Failure Risk, Duty of Care, Traveller Safety, Regulatory and Compliance Risks, Data Security and Cyber Risk, Marketing Volatility, Operational Disruption, Reputational Risk, ESG Risk, Geopolitical Risk and Financial Risk. This will be through the method of the Sustainability Risk Management Matrix.

Suppliers must:

- Comply with the Modern Slavery Act 2015 or equivalent legislation
- Ensure employment is freely chosen
- Maintain records demonstrating compliance
- Apply these standards throughout their own supply chains

## Anti-Bribery & Anti-Corruption

*(UK Bribery Act 2010)*

arrangeMY maintains a zero-tolerance approach to bribery, corruption, facilitation payments, fraud, and improper advantage.

### Prohibited Conduct

It is strictly prohibited to:

- Offer, give, solicit, or accept bribes or inducements of any kind
- Make facilitation payments
- Use third parties to obtain improper business advantage

### Gifts, Hospitality & Conflicts of Interest

- Gifts and hospitality must be proportionate, transparent, and legitimate
- Political donations and sponsorships must be approved in advance
- All conflicts of interest must be declared and appropriately managed

### Risk Assessment & Controls

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- arrangeMY conducts periodic ethics and corruption risk assessments covering:
- Procurement and supplier engagement
- Agents and intermediaries
- Geographic and sector-specific risks

Controls include approval thresholds, segregation of duties, and documented procurement procedures.

### **Training & Awareness**

- Employees involved in procurement or supplier management receive regular ethics, modern slavery, and anti-bribery training
- Training records are maintained and reviewed annually

### **Speak-Up & Whistleblowing**

arrangeMY maintains a confidential whistleblowing mechanism available to employees and third parties.

Reports relating to:

- Modern slavery or labour exploitation
- Bribery or corruption
- Ethical or legal breaches

will be:

- Investigated promptly
- Treated confidentially
- Managed without retaliation

### **Sustainable Procurement & Environmental Responsibility**

arrangeMY is committed to sustainable procurement and responsible environmental management. We ensure goods and services:

- Are sourced responsibly and ethically
- Are produced, delivered, used, and disposed of in an environmentally and socially responsible manner
- Deliver long-term value for money
- Comply with environmental laws and support continuous improvement
- Agree to select low-carbon options where possible.
- Ensure that Waste, Energy, Circularity and Biodiversity are not affected due to our operational actions.
- We have introduced Compliance and ESG criteria in our Partnership Agreements as of 2025.
- arrangeMY agrees to increase the % volumes of audited ESG accredited suppliers year on year for each major transactional sector. We have set

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targets for Hotel, Rail & Air disclosed in our 2026 Environmental and Sustainability Plan.

- Purchasing for any operational items for the business has to be authorised and approved by a Line Manager and purchased through the correct purchasing channels, as pre-determined by the Business Services Director – Sophie Holtom.

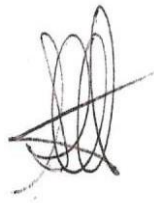
### **Monitoring, Compliance & Continuous Improvement**

- Compliance with this policy is monitored through:
- Supplier due diligence and audits
- KPI and management review
- Annual policy review and updates

This policy will be reviewed every 12 months from April 2026 or earlier if required by law or risk exposure.

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Signed:



Dated: 19/04/26

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