



# Modern Slavery Statement 2023

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# About this statement

This statement is made by Intrepid Travel pursuant to section 54 of the Modern Slavery Act 2015 (UK) and the Australian Commonwealth Modern Slavery Act 2018, for the period 1 January 2023 to 31 December 2023 (the reporting period or FY23) and constitutes our Modern Slavery Statement for 2023.

This statement details Intrepid's approach to understanding and managing the modern slavery risks in our global operations and our supply chain during 2023. This statement is Intrepid's sixth Modern Slavery Statement and corresponds to our previous statements. It is part of our broader human rights commitment, as set out in our Global Human Rights Policy. This statement outlines the practical steps we have taken and highlights the commitment to future actions in our ongoing work to identify and minimise risk of modern slavery. This statement was

approved by the Intrepid Board on behalf of all our reporting entities (acting as a higher entity under section 14(2)(d) (ii) of the MSA) on 5 June 2024.

This statement has been uploaded to the UK Modern Slavery Register and to the Australian Modern Slavery Register as required under the Acts for both countries, as well as to the Intrepid website. A link to this statement will be displayed on the home page of our website as per the requirements of the Modern Slavery Act 2015 (UK).



Arkaroo Rock Walk, Wilpena Pound, Ikara-Flinders Ranges National Park, South Australia.  
Photo by Patrick O'Neill.

## Acknowledgment of Country

Intrepid Travel acknowledges the Traditional Custodians of the lands on which we live and work. Our head office is in Narrm/Melbourne, on the lands of the Wurundjeri People of the Kulin nation, but our people work and live across Australia, and we pay our respects to Elders, past and present, of the lands that we visit, work and live on. We acknowledge and respect their deep connection to Country, waters and skies, and are grateful for their willingness to share their culture and history so that we may grow as a company and as individuals.

# Modern slavery in context

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain.

The [2023 Global Slavery Index](#) research found that there are approximately 50 million people living in slavery conditions around the world, an increase of 10 million from the [2018 study](#). Fifty six percent of those victims are in some form of forced labour, a term that covers servitude, forced labour, debt bondage and deceptive recruitment. Ending modern slavery, forced labour, and human trafficking by 2030 is part of the UN Sustainable Development Goal 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

## The political and legislative context

Every company is at risk of being involved in this crime through their operations and their supply chain.

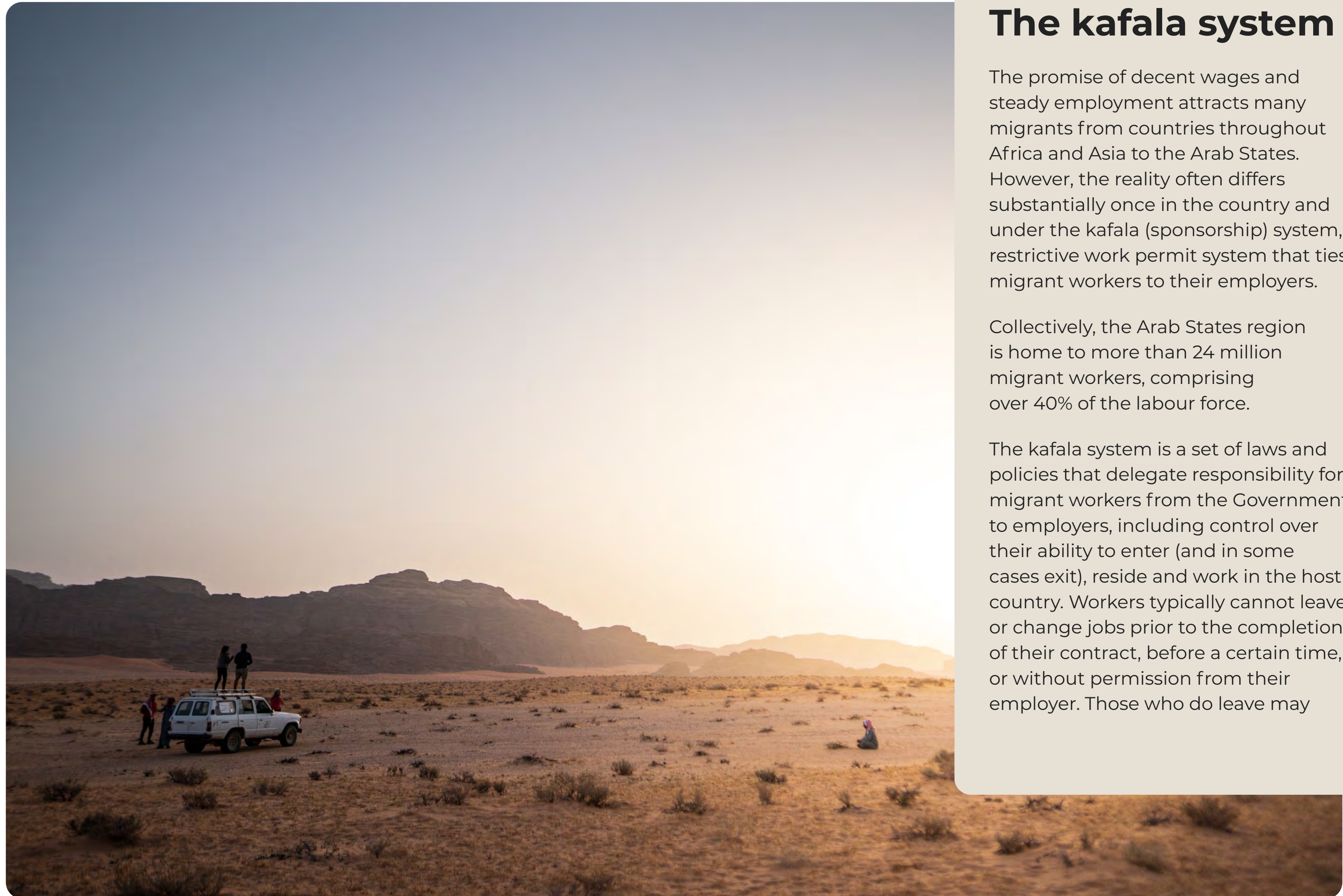
The UK Modern Slavery Act 2015 requires businesses with a presence in the UK to publish a Modern Slavery Statement detailing the steps an organisation is taking to tackle modern slavery. To comply, this statement must report on the work that an organisation is doing with its tier one and tier two supply chain to expose any instances of modern slavery, rectify these issues and improve suppliers' response to modern slavery issues.

The Australian Modern Slavery Act was reviewed in 2022 with the [report](#) and recommendations made available in 2023. Intrepid participated in the consultation session in October 2022. The recommendations are yet to be implemented.

The Canadian Government and the European Union also intensified efforts to combat modern slavery in 2023. However, Intrepid Travel is not required to report under Canada's Against Forced Labour and Child Labour in Supply Chains Act or current EU supply chain legislation.

While progress towards combating modern slavery is slow globally, certain governments have actively wound back human rights and workers' rights, increasing the risk of modern slavery.

[The 2023 ITUC Global Rights Index](#), prepared by the International Trade Union Confederation, reports that risks in the Middle East and North Africa have intensified, and conflict zones such as Syria, Libya, Palestine and Yemen have seen complete breakdowns of laws protecting workers.



## The kafala system in the Middle East

The promise of decent wages and steady employment attracts many migrants from countries throughout Africa and Asia to the Arab States. However, the reality often differs substantially once in the country and under the kafala (sponsorship) system, a restrictive work permit system that ties migrant workers to their employers.

Collectively, the Arab States region is home to more than 24 million migrant workers, comprising over 40% of the labour force.

The kafala system is a set of laws and policies that delegate responsibility for migrant workers from the Government to employers, including control over their ability to enter (and in some cases exit), reside and work in the host country. Workers typically cannot leave or change jobs prior to the completion of their contract, before a certain time, or without permission from their employer. Those who do leave may

run the risk of arrest and deportation for the crime of absconding.

The system also limits the ability of exploited workers to access justice. In practice, a worker who leaves their job not only risks losing their means of earning an income but also risks becoming an illegal migrant.

By placing control over entry, exit, work, and residence in the hands of employers, the system leaves migrant workers vulnerable to exploitation and modern slavery, particularly in domestic work, construction, hospitality, and sectors where seasonal work is common.

Variations of the kafala system exist in Jordan, Lebanon, and the GCC countries — Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the UAE.

*Excerpt from [The Global Slavery Index 2023](#), pages 109-115.*



# Intrepid’s structure, operations and supply chain

For more than 35 years, Intrepid Travel has been changing the way we all see the world by offering sustainable experience-rich travel that gives back to the places and people we visit. We have 29 offices around the world and operate more than 900 small group adventures in 114 countries across all seven continents. In 2023, this saw us take a total of 328,211 customers to explore the world. Every trip – whether closer to home or further afield – is designed for customers to truly experience local culture and engage with communities.

Intrepid is a certified [B Corporation](#), a global certification for companies that strive for the highest verified environmental and social standards. We are committed to:

- **Respecting the destinations we operate in**
- **Supporting local people**
- **Preserving the environment**
- **Protecting the rights of the most vulnerable**
- **Giving back to local communities**

As a vertically integrated tour operator, Intrepid owns Destination Management Companies (Intrepid DMCs), which operate most of our itineraries. This vertically integrated company model enables Intrepid to manage its own operations and have greater oversight of our supply chain. It also enables us to identify and mitigate risk areas of modern slavery and trafficking within our business.

## Our business



## Our board

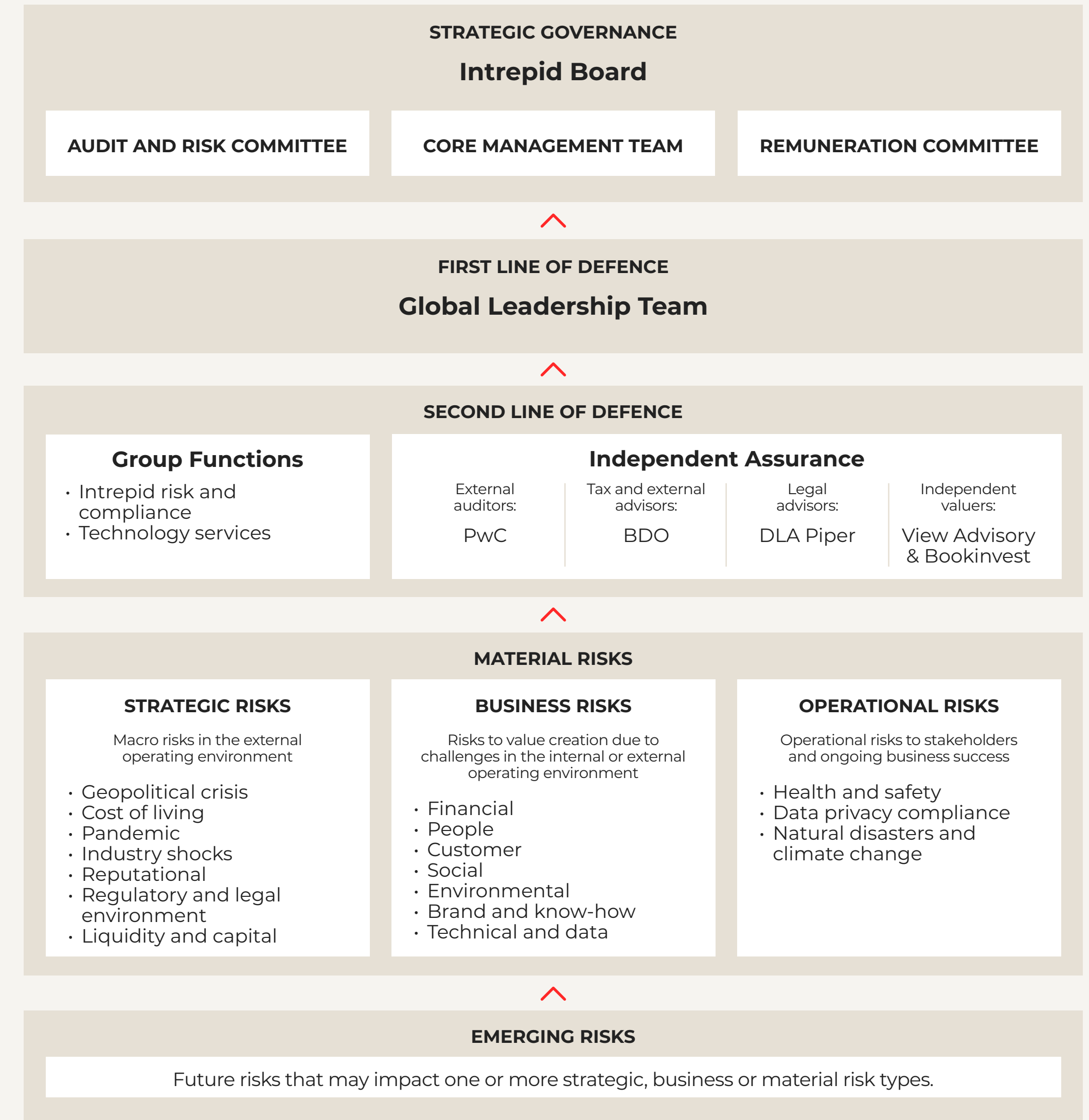
We are governed by a board of six directors with responsibility for approving the strategic direction of the business, supporting the management team to achieve our strategic plans, monitoring risk, culture, reputation and standards of conduct, and overseeing responsible governance practices.

The Audit and Risk Committee oversees financial management (including the external audit process), compliance and risk management, internal control systems, insurance and legal proceedings and health and safety. Modern slavery falls under the remit of the Audit and Risk Committee.

Intrepid Travel's [2023 Integrated Report](#) provides further details on our business and governance structure.

Intrepid has implemented the COSO Enterprise Risk Management – Integrated Framework to manage its global risk. The Company Secretary is responsible for this framework, as well as maintaining the company's risk register.

## Risk-governance structure

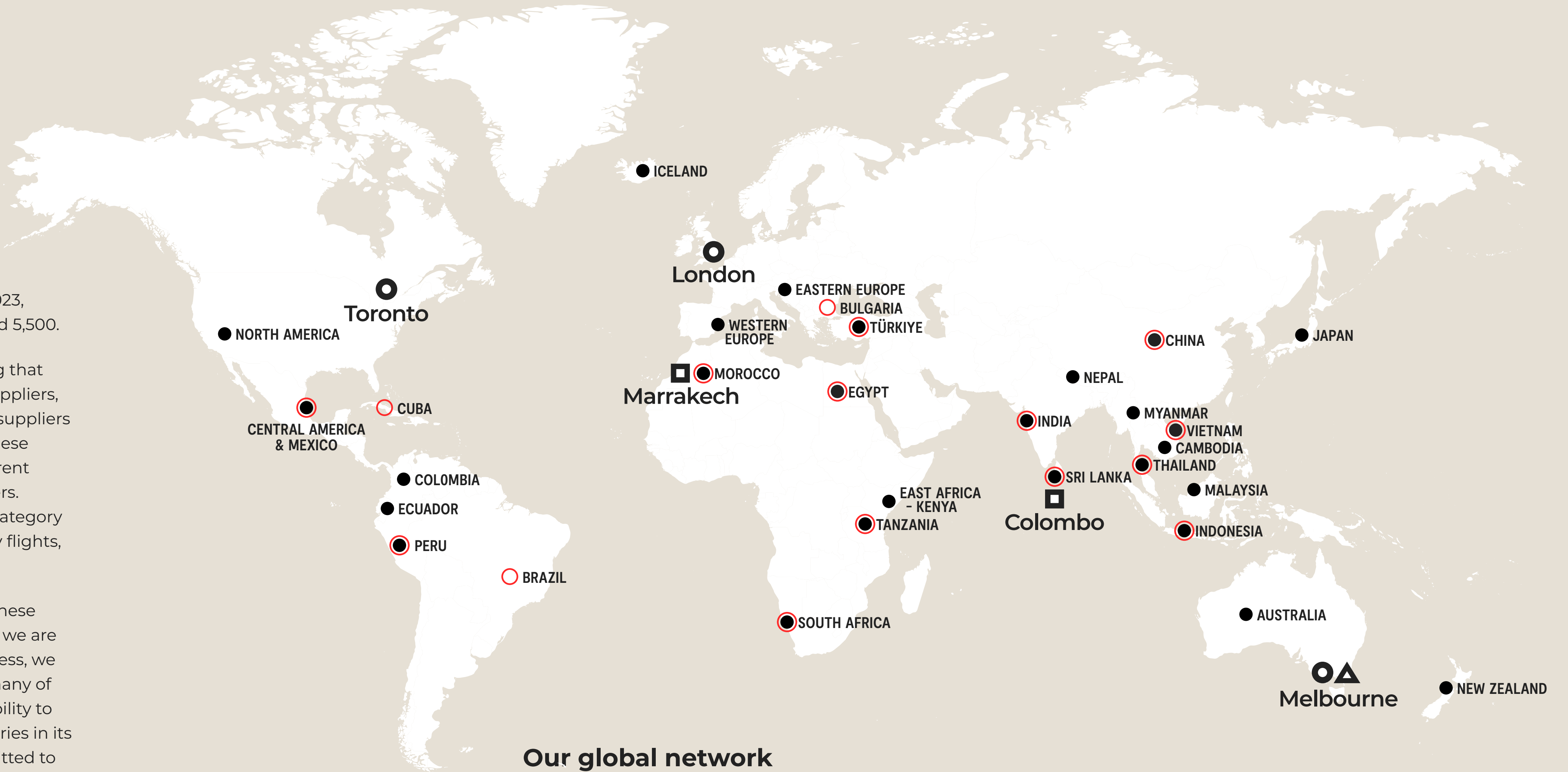


## Supply chain

Intrepid's supply chain is global and encompasses suppliers that help us to operate our business and our trips. This results in a diverse range of suppliers across industries. In 2023, Intrepid's direct suppliers totaled 5,500.

We are a tour operator, meaning that we contract accommodation suppliers, transport suppliers, experience suppliers and restaurants and package these components into over 900 different itineraries to sell to our customers. Accommodation is the largest category measured by spend, followed by flights, transport, activities and meals.

We do not own these services; these are our tier one suppliers. While we are a large and diverse global business, we are a relatively small client for many of our suppliers. This means our ability to influence supplier operations varies in its degree. However, we are committed to respecting human rights throughout our supply chain and working with our suppliers and business partners to adopt and follow principles and standards like our own.



## Our global network

- Global headquarters
- Sales and marketing regional office
- Shared services
- Destination Management Company offices (DMC)

Risk of severe or serious violation of human rights



## Assessing risk in our operations and supply chain – by industry

Modern slavery can occur in every industry and every sector. Travel and tourism are vulnerable in part because elements of the industry rely on low-skilled roles filled by unskilled or migrant workers, such as kitchen staff and hotel housekeepers or the unlawful use of child labour in the

handicrafts and textiles industry. When assessing industry risk, the travel and tourism sector is not measured as a whole industry, rather the assessment is made on a range of tourism-related subindustries (see Table 1.0). This data is contained in consultancy Edge Impact’s report ‘Modern slavery using the Global Industry Classification Standard taxonomy’ (not publicly available).

**Table 1.0 – Risk in Intrepid’s supply chain**

TRAVEL RELATED SUB-INDUSTRY	ENTRY POSITION IN INTREPID’S SUPPLY CHAIN (TIER 1/2/3)	MODERN SLAVERY RISK RATING
Casinos & Gaming	n/a	High
Leisure Facilities	○ T2	Very high
Restaurants	● T1	Very high
Hotels, Resorts & Cruise Lines	● T1	High
Airline	● T1	High
Marine	● T1	High
Rail	● T1	Medium
Airport Services	○ T2	Medium
Marine Ports	○ T2	High

● Highest / most severe risk. ○ Serious risk.

Other adjacent industries that are considered high risk for modern slavery, according to the [United Nations Global Compact](#), are cleaning, hospitality, and textiles production.

As a tour operator, Intrepid’s direct risk of modern slavery in our business is comparatively low compared to these adjacent industries. But the risk profile for our tier one suppliers is high.

## Assessing risk in our operations supply chain – by country

In 2023, Intrepid operated 923 trips in 114 countries. Some of these destinations are in the highest-risk countries for modern slavery, according to the [Destination Risk Map](#) created by the Roundtable Human Rights in Tourism and the Global Slavery Index 2023 by WalkFree.

According to data from the Destination Risk Map, we operate trips and have an office and/or DMC in three of the four countries that are at the most severe risk of human rights violations (see table 2.0):

**Table 2.0 – Countries at risk of severe violation of human rights**

COUNTRY	OFFICE/DMC	TRIP (2023)
China	●	●
Egypt	●	●
Vietnam	●	●
Venezuela	n/a	n/a

Using the data from the Global Slavery Index, we operate trips and have an office and/or a DMC in two of the top ten countries that are at the highest risk of modern slavery violations (see table 3.0).

Additionally, we operate trips and/or have offices in fourteen of the eighteen countries that are at serious risk of a human rights violations according to the Destination Risk Map (see table 3.1).

**Table 3.0 – Countries with the highest risk of modern slavery violations (Global Slavery Index)**

COUNTRY	OFFICE/DMC	TRIP (2023)
North Korea	n/a	n/a
Eritrea	n/a	n/a
Mauritania	n/a	n/a
Saudi Arabia*	n/a	n/a
Türkiye	●	●
Tajikistan	n/a	●
UAE	n/a	n/a
Russia	n/a	n/a
Afghanistan	n/a	n/a
Kuwait	n/a	n/a

\*Note that Intrepid has launched a trip to Saudi Arabia in 2024

● Highest / most severe risk. ○ Serious risk.

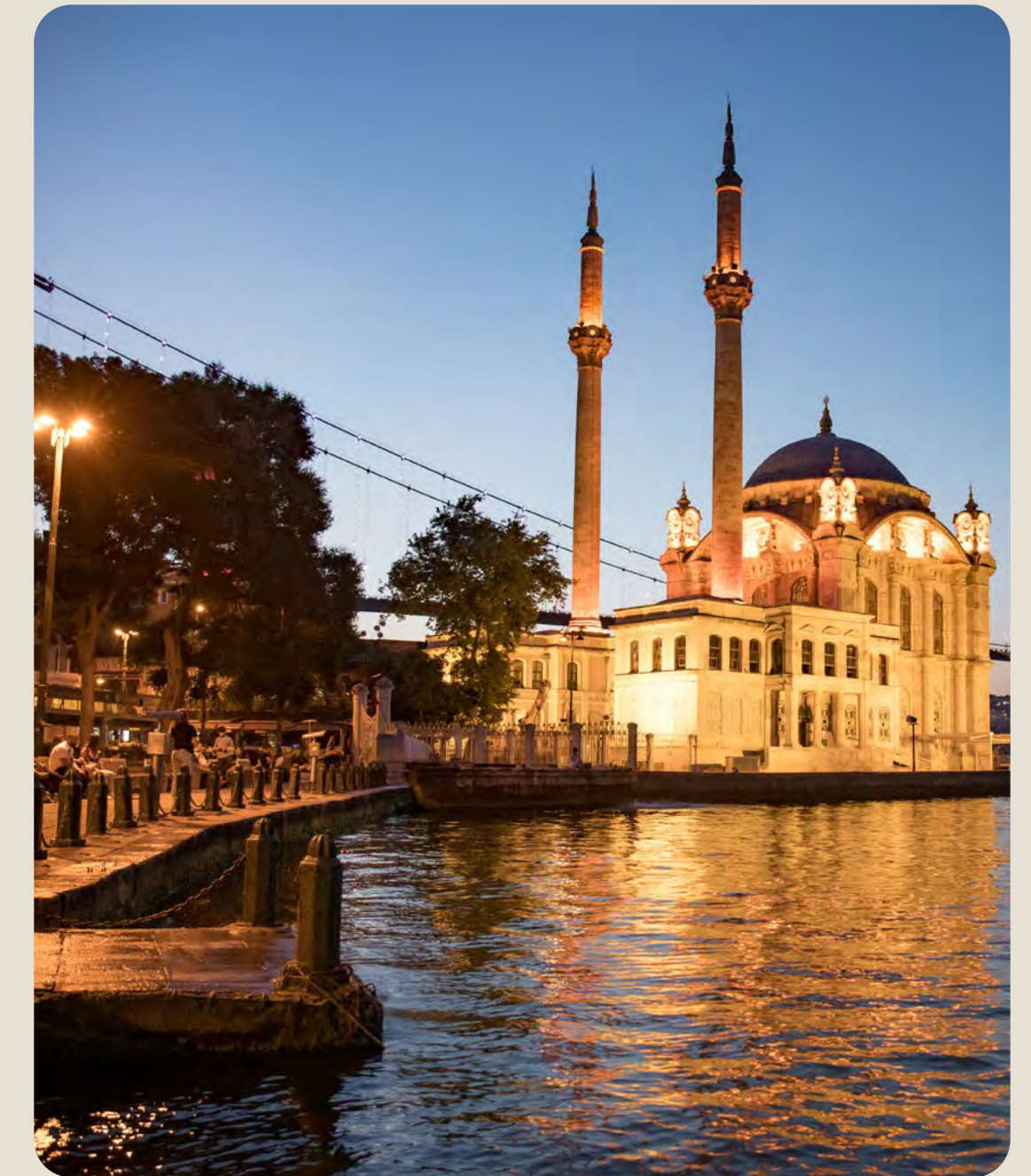
**Table 3.1 – Countries with the highest risk of human rights violations (Destination Risk Map)**

COUNTRY	OFFICE/DMC	TRIP (2023)
Türkiye	○	○
Indonesia	○	○
India	○	○
Thailand	○	○
Morocco	○	○
Sri Lanka	○	○
Colombia	○	○
Peru	○	○
Mexico	○	○
South Africa	○	○
Tanzania	n/a	○
Cuba	n/a	○
Bulgaria	n/a	○
Brazil	n/a	○
UAE	n/a	n/a
Tunisia	n/a	n/a
Maldives	n/a	n/a
Dominican Republic	n/a	n/a

**Intrepid’s top 10 destinations in 2023**

- |              |                |
|--------------|----------------|
| 1. Vietnam   | 6. Türkiye     |
| 2. Morocco   | 7. Italy       |
| 3. Egypt     | 8. Japan       |
| 4. India     | 9. Jordan      |
| 5. Australia | 10. Costa Rica |

Our highest risk and greatest opportunity to understand modern slavery risk is through tier one suppliers in high and very high-risk subindustries in very high-risk countries where we visit the most. These countries and supplier types are on our priority list for modern slavery due diligence. Once we assess practices that contribute to modern slavery risks, we can attempt to influence a change through education and upskilling. We are limited in our leverage, but if we deem the risk too high or the supplier does not address the risk within a certain timeframe, we can remove the supplier from our itineraries. If we find evidence of modern slavery, we will ask the local General Manager for assistance to remedy through a local authority or a local NGO, depending on the type of activity identified.



# How important is modern slavery to our stakeholders?

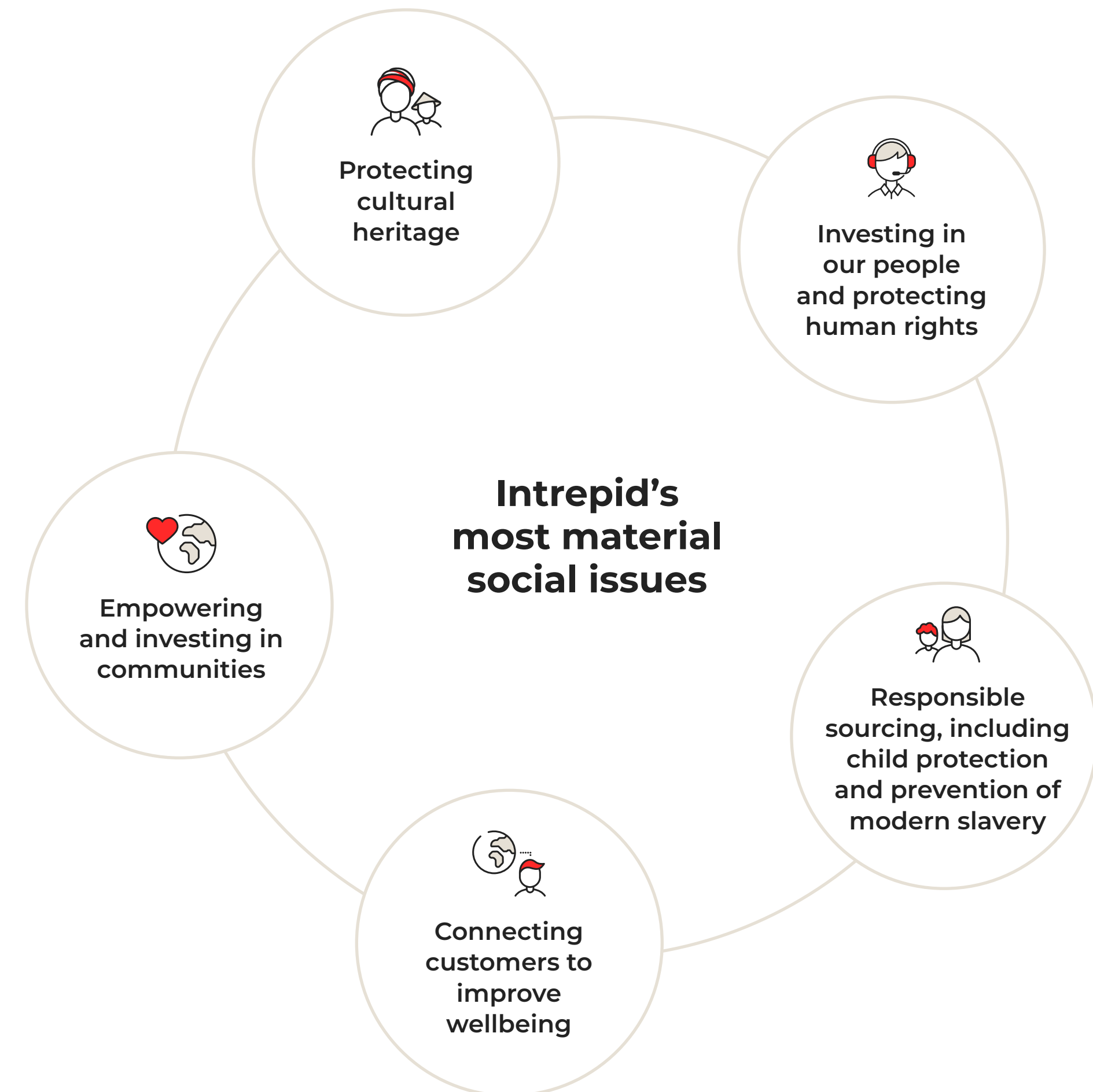
In 2023, we wanted to understand the sustainability issues that mattered most to our customers, suppliers, people and partners. We conducted a survey, asking them to rate the importance and impact of a range of governance, social and environmental sustainability topics.

We are using these findings to help shape the goals for the responsible operation of our business, prioritise our actions, communicate our purpose, and impact performance to our stakeholders. The results also help us identify emerging trends and risk that may affect long term value creation.

In total, we received 1,632 responses – an engagement increase of over 80% since our 2021 materiality assessment. The survey showed that all stakeholders considered all issues ‘important’ or ‘very important’. However, it was

the social issues that proved most important in each group. Human and labour rights, which includes modern slavery, were in the top 3 concerns for customers and partners.

To capture the top 20 social impact concerns, we have consolidated them into broader material issues that will inform our Purpose Strategy, with modern slavery as part of our responsible sourcing focus (the highest-ranking issues are shown to the right of this page)..



# Intrepid’s commitment to reducing modern slavery risk

Intrepid takes human rights seriously and is fully committed to playing our part in ending modern slavery and preventing slavery and human trafficking in our operations and supply chain.

Through the adoption of the Sustainable Development Goals (SDGs), in particular SDG 8 (Decent work and economic growth), we are part of the global community that has committed to ending modern slavery, human trafficking, and child labour by taking immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour.

During 2023, we actively engaged and consulted with all companies we own or control in educating them on the causes of modern slavery and the steps Intrepid is taking to combat them. The details of the Modern Slavery Act 2018’s reporting requirements have been discussed with each of them, including the potential changes to legislation that will impact our approach to measuring, mitigating and reporting on modern slavery.



SDG 8:

## Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

For SDG 8, there are 10 targets and two of them, target 8.7 and 8.8 address the eradication of modern slavery and human trafficking and the protection of workers’ rights to a safe workplace:

8.7 – Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

8.8 – Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

# Management, reduction and oversight of risk

This statement on modern slavery outlines how Intrepid works to prevent, identify, and mitigate incidences of modern slavery, which encompasses forced labour and wage exploitation, involuntary servitude, debt bondage, human trafficking, forced marriage and other forms of exploitation.

## How we manage risk of modern slavery

### Global supplier benchmarking

The Intrepid DMC network and contracting team tracks the structure, quality, service and performance of existing suppliers. This procedure allows Intrepid to evaluate suppliers regularly and identify and mitigate any issues related to compliance with our Supplier Code of Conduct. See the policy section on the next page for more details on the Code.

### Recruitment and employment

Intrepid complies with the policies set out in the company's Employee Handbook.

Additionally, we employ the following actions:

1. Directly recruit, select and hire all staff and trip leaders for trips run by Intrepid.
2. Meet all legal obligations in the recruitment and on-boarding process, focusing on a potential staff or trip leaders' right to work in the relevant country in which they will be engaged.
3. Conduct due diligence on our prospective staff and trip leaders prior to them joining Intrepid, including a robust selection process, and employment references.
4. Recruit, promote and develop our people on the grounds of merit and capability alone and ensure diversity and inclusion.
5. Staff and trip leaders are provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear.
6. Workers are free to lawfully resign their employment without restriction or penalty.
7. Workers are paid their legal pay entitlements, on time and provided with pay slips clearly showing how wages have been calculated and details of any deductions.
8. Do not deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers for any reason.
9. Original identity related documents of workers, such as passports, national identity cards or birth certificates, are not retained by Intrepid.
10. Workers are not required to lodge any security deposits such as financial or personal property, nor pay any recruitment fees to be employed by Intrepid.
11. All workers have the right to join or form trade unions of their own choosing, and to bargain collectively, without prior authorisation from management, according to national law.
12. Have policies and mechanisms in place to ensure that staff and trip leaders are not at risk of bullying, undue control, servitude, forced labour, human trafficking or exploitation.

### Customer feedback

Every customer is emailed an online feedback form after the end of their trip. They are asked whether their trip was operated responsibly and provides the ability for customers to add comments. This feedback is collated by Intrepid's global operations team every month and reported back to the broader business. Customer comments that indicate there may have been a breach in our responsible travel practices are followed up and investigated by the Intrepid DMC office where the complaint occurred.

### Leader trip report

All Intrepid trip leaders are required to prepare and send a trip report to their manager within 48 hours of completing each tour. Included in this report is a section where a leader can document the practices of suppliers (accommodation, transport providers, restaurants, and other businesses). It is a mechanism for Intrepid to identify and mitigate any potential risks from within our supply chain.

### Our policies

The following policies and guidelines assist Intrepid's staff and suppliers to ensure the company operates responsibly and protects human rights throughout our operations.

#### Global Human Rights Policy

Intrepid's Global Human Rights Policy outlines our commitment to respecting internationally proclaimed human rights and ensuring the company is not complicit in human rights abuses. The policy outlines the rights, responsibilities and our expectations of all staff regarding the safeguarding of human rights. It explicitly condemns the use or support of any type of forced labour, including slavery, prison labour or labour enforced by intimidation, and our commitment to complying with the national laws on child labour and the minimum working age.

This policy was reviewed and updated in 2023, with a commitment to undertake human rights due diligence every three years.

#### Code of Conduct

Intrepid is committed to obeying the relevant laws governing operations in all countries and regions in which we do business. The Intrepid Code of Conduct guides staff in identifying and overcoming ethical and legal challenges in day-to-day working life and provides a basis for dealing with conflict.

### Trip Leader and Crew Conduct Policy

This policy provides guidance to all trip leaders and crew operating Intrepid trips on the type of conduct that is deemed inappropriate and would result in termination of their contract. Such behaviour includes compromising duty of care to customers, failing to follow Intrepid's core values, or breaching local laws and other acts of misconduct.

#### Supplier Code of Conduct

The Supplier Code of Conduct conveys our expectations to our suppliers that they will support ethical practices. All suppliers must sign the Code and are required to demonstrate that they:

1. Respect human rights and labour laws;
2. Support local communities;
3. Identify and monitor bribery and corruption risks;
4. Identify and monitor negative environmental impacts;
5. Introduce and maintain quality assurance policies and procedures;
6. Introduce and maintain health and safety policies and procedures.

The Supplier Code of Conduct was updated in 2023 to specifically outline Intrepid's expectations of the behaviours and practices that will mitigate the risk of modern slavery.

### Prevention of Bribery and Corruption Policy

Intrepid's company culture emphasises the expectation to act with integrity and be socially responsible. Accordingly, we are committed to conducting business fairly, openly and honestly. We inherently oppose bribery and corruption. We recognise that these inappropriate ways of doing business are evident and are a cause of hardship and crime in several countries in which we operate.

Laws in several countries (*UK Bribery Act 2010, US Foreign Corrupt Practices Act 1977, AU Criminal Code [Bribery of Foreign Officials] 1999*) hold Intrepid Travel's companies, staff and suppliers accountable for preventing bribery and corruption anywhere in the world where we do business. Intrepid's Prevention of Bribery and Corruption Policy confirms our commitment to comply with these laws and outlines actions to be taken by all companies within the Group to achieve this aim.

### **Prevention of Discrimination, Bullying and Harassment Policy**

Intrepid's Prevention of Discrimination, Bullying and Harassment Policy confirms that we do not condone any form of discrimination, bullying or harassment in the workplace, and will act to stamp out any such behaviours reported to management or human resources. The policy outlines the rights, responsibilities and our expectations of all staff regarding preventing discrimination, bullying and harassment to create the workplace we all want. This policy applies to all employees, contractors, temporary staff, volunteers and visitors of all Intrepid companies.

### **Whistleblower Policy**

The Whistleblower Policy provides individuals with a means to report any concerns regarding malpractice, wrongdoing, or illegality to the company's attention. The confidential nature of the reporting process allows individuals to lodge a report without fear of reprisal or intimidation. A whistleblower committee investigates concerns raised and rectifies them where necessary.

This policy applies to all permanent and temporary employees of Intrepid companies. It also applies to freelance trip leaders and crew, external consultants, contractors, and agency personnel while providing services to Intrepid companies.

### **Purchasing Policy**

Each year, Intrepid spends a substantial sum of money purchasing goods and services in the countries where we operate. With this purchasing power comes responsibility. The purchasing decisions we make have a material impact, not only on our business but on the environments and communities in which we operate. The Purchasing Policy aims to ensure that we create positive impacts while still serving the operational needs of the business.

### **Declarations of Interest Policy**

Intrepid requires all staff to declare if they hold an interest in, a position of power or gain over, or a personal relationship with a business outside of Intrepid. An interest can be held personally or by a spouse or partner, a family member (children, parents, etc.) or close friend, or through a company or trust. To gain complete visibility of our supply chain, which is critical to the management of our modern slavery risk, staff have a duty of care to declare their interest in a business within our supply chain.

### **Responsible Travel Policy**

Intrepid's Responsible Travel Policy outlines our principles for travelling responsibly: To ensure that our operations respect local destinations, preserve the local environment and protect wildlife and the rights of the most vulnerable, while also giving back to the places we travel. We train our staff and trip leaders on our Responsible Travel Policy and supporting guidelines.

### **Global Porter Policy**

Intrepid is committed to ensuring respectful and fair working conditions for all trekking porters. This policy includes specific local porter regulations at our offices in Nepal, Peru and Kenya. Intrepid's Kokoda Local Porter Regulations focus on ensuring the fair treatment and welfare of our porters when we are leading trips on the Kokoda Track in Papua New Guinea.

### **Staff education**

Intrepid mandates human rights and global modern slavery awareness training for all new staff joining the business through our onboarding process. The modern slavery training is delivered via Intrepid's internal people portal and while not compulsory, it is continuously prompted for completion to new joiners. 81.9% of staff completed the modern slavery and child protection training modules online in 2023.

Our training consists of the following modules:

1. An explanation of modern slavery;
2. A link to our Modern Slavery Statement;
3. Our stance on child protection;
4. Intrepid's Child Protection Guidelines;
5. An explainer on the ChildSafe program;
6. Why we don't visit orphanages;
7. Why we don't encourage travellers to give money to beggars.

Furthermore, in 2023 16 virtual training sessions were delivered to 770 staff across the globe, including a module on modern slavery and a module on how Intrepid is strengthening our responsible supply chain practices.

We also had three external speakers in the office (or virtually) to present to staff on issues of human rights, human trafficking, modern slavery and forced marriage.

## How we mitigate risk

### Empowering communities

Our style of Sustainable Experience Rich Travel (SERT) enables us to help more people benefit culturally and economically from global travel, by anchoring community experiences within our itineraries. We promote the fulfilment of human rights and reduce the risk of modern slavery by contributing to local, social, environmental, and economic development.

### Living wage

A living wage is the estimated lowest income required for a worker to afford a decent standard of living for themselves and their family. It considers a worker's ability to afford clean drinking water and sanitation, decent housing, adequate clothing, infrastructure and tools if required to work, a nutritious diet, social services and ability to save. Earning a living wage lessens the likelihood of individuals becoming victims of forced or bonded labour or child labour. Paying a living wage for all employees is a commitment that Intrepid signed up to through the [United Nations Forward Faster](#) Initiative in 2023.

Each year, Intrepid conducts a remuneration review, analysing the salaries of staff to ensure these meet the living wage set for each location. In 2023, the remuneration review was based on global family living wage data purchased from [Wageindicator Foundation](#), a global, independent, non-profit organisation that collects, analyses and shares information on actual wages, minimum wages, living wages and labour laws.

We identified ten staff members in four countries who were paid less than the living wage, whose salaries were remediated, enabling us to achieve our living wage goal across our entire global workforce - in 29 offices across 6 continents – just one year since adopting the goal. This is particularly relevant when considering the travel industry was one of the most impacted by COVID-19 and is amongst the lowest paying global industries. We will be expanding the living wage review to our contracted trip leaders in 2024.

### Supportive partnerships

We continue to have a strong relationship with the [Blue Dragon Foundation](#) in Vietnam, which works to help children escape from crisis through protection from sex trafficking, forced labour and slavery, and provides shelter, education and employment. In 2023, the Intrepid Foundation's Blue Dragon Marathon Walk raised AUD \$328,322, which was almost double the amount raised the previous year. Intrepid's contribution supports Blue Dragon to launch hundreds of rescues, provide thousands of nights of emergency shelter and emergency packs of essential items for victims.

The Intrepid Foundation also supports other not-for-profit organisations that work to protect children from exploitation through direct donations, including:

1. [Open Arms](#), an organisation in Spain that protects people trying to reach Europe by sea. They may be fleeing from armed conflict, persecution or poverty. Open Arms also provides education and support to the communities on the mainland so that those who migrate can freely make informed decisions.
2. [Patinaai Osim](#), a not-for-profit organisation in Kenya that supports the education of children and empower marginalised women to create sustainable livelihoods, helping to ensure they are not forced to marry against their will.

3. [Kilimanjaro Porters Assistance Program](#), part of the Kilimanjaro Responsible Trekking Organisation, who advocate for the fair treatment of the Kilimanjaro mountain crew (porters) in Tanzania. They ensure all the minimum standard requirements for porters, climbers and even trekking companies are met.

### Creating transparency in our supply chain

In 2023, we focused our responsible supply chain efforts on measuring environmental, social and governance (ESG) practices of our supply chain, including human rights.

1754 material suppliers were surveyed providing us purpose related supplier impact data for over 500 trips. We also held 8 supplier conferences across Vietnam, India, Indonesia and Thailand spanning the topics of improving environmental practices, child protection, human rights and modern slavery.



### Exposing modern slavery risk in our supply chain

Intrepid is a member of a consortium with a global travel industry partner, Flight Centre Travel Group, to measure the risk of modern slavery in both companies' supply chains through the [Informed365](#) technology platform. This platform manages the distribution of, and response to, supplier surveys about practices to reduce modern slavery risk and disseminates improvement plans to suppliers where required. A consortium approach can reduce the burden on suppliers of responding to multiple surveys by sharing the information between consortium members with supplier consent. Intrepid and Flight Centre are founding members of the consortium.

In 2023, we trialled the survey with 56 Australian operational suppliers. The response rate was lower than expected at 12.5%, but in line with response rates from other consortiums. To address the low response rate, we asked key relationship managers to encourage suppliers to complete the survey. With more than 5,000 suppliers, this is not a sustainable long-term strategy. The response rates only increased incrementally with this more personalised approach as, in most cases, the person responsible for completing the survey was not the same person that Intrepid had a relationship with.

We attempted to launch the survey in China, as this was identified as one of our highest risk markets. However, we faced two barriers:

- Chinese suppliers would require the survey to be translated. We found that the multilingual function of the software was not fit-for-purpose and we would need to create a work around that would require some manual adjustments to the reporting output; and
- New legislation governing the flow of information about companies operating in China.

As a result, we have paused this work indefinitely.

We also attempted to survey suppliers in Egypt, but our DMC requested that we delay this due to supplier uncertainty caused by the war in Israel and the Palestinian Territories and ongoing supplier contracting. This is now scheduled for 2024.

The outcome of finding practices that flag risks among our suppliers is an "improvement plan", in which we share resources related to the risk. For example, if we found a supplier who used a recruitment company to contract cleaning staff from migrant backgrounds, but they did not have any oversight over the recruitment company's hiring practices, we would provide a list of questions for our supplier to ask of the company. In preparation for these plans, we created a Modern Slavery Global Resource Database, enabling us to share resources quickly and easily with suppliers in multiple languages as the need is identified through the survey results.

### Increasing our reporting capacity

Intrepid welcomes rapidly changing regulatory requirements particularly in relation to sustainability reporting and disclosures to foster greater levels of corporate transparency and accountability.

Intrepid is responding by investing in capacity building and resourcing our legal, communications and purpose teams through additional staff, targeted training and upskilling.

- In April 2023, we employed a Purpose Specialist, who dedicates 20% of her time to modern slavery due diligence.
- In October 2023, our Responsible Supply Chain Manager moved from .4FTE to .8FTE to fast track the supplier transparency project.
- 2023 was the first full year for the Global Social Impact Manager role, appointed in September 2022.
- We created a Purpose Champions Network, with champions in every office. These champions assist in upholding and reporting on our environmental and social impact commitments, including our modern slavery commitments.

We welcome and employ third-party input and oversight through specialist groups and advisors.

- Intrepid is a member of the United Nations Global Compact (ANZ) Modern Slavery Community of Practice. The first meeting we attended was in November 2023.
- Intrepid is a founding member of the [Modern Slavery Tourism Consortium](#) through the Informed 365 supply chain management platform. We attend monthly meetings facilitated by an external modern slavery specialist.
- In 2023, Intrepid signed up to the [UN Global Compact's Forward Faster](#) initiative and committed to one of the key living wage targets: to ensure 100% of employees across our organization earn a living wage by 2030.
  - In doing so, we advocated for others to consider committing to paying a living wage by publishing our actions on the B Lab ["Be the Change" blog](#), that is distributed to B Corps globally.

- ChildSafe accreditation
  - Intrepid Thailand has been trialling a partnership with [Friends International](#) to be accredited as part of their ChildSafe Movement Program. Friends International is a not for profit organisation that deliver a wide range of innovative and holistic social services for marginalised children and their families in countries around the world.
  - In 2023, we progressed through two of the seven actions that are required of us to complete accreditation:
    - Arrange ChildSafe awareness training for all company staff including contractual staff (i.e., freelance trip guides).
    - Adopt and implement ChildSafe communications and media guidelines.
  - We expect the accreditation to be complete by the end of 2024.

### Industry and other advocacy

Intrepid engages in industry advocacy on modern slavery through membership of relevant industry groups, participation in forums and speaking engagements on relevant topics.

In 2023, this included:

- Attending the Informed 365 Webinar: Modern Slavery Act - Four Years On in March.
- Attending the Commonwealth Attorney-General Department’s 2023 Modern Slavery Conference in June.
- Attending the United Nations Global Compact Network Australia’s (UNGCNA) Human Rights dialogue in August.
- Attending the Business and Human Rights Resource Centre’s presentation on corporate accountability and human rights due diligence legislation in September.
- Presenting on the Modern Slavery Tourism Consortium at the Flight Centre Partnership Summit in October.
- Attending the United Nations Global Compact’s Modern Slavery Community of Practice – Optimising Stream in November.

We also maintain ongoing:

- Membership to the [UN Global Compact Network](#), the world’s largest corporate sustainability initiative to help businesses support the UN Sustainable Development Goals.
- Support of [Rethink Orphanage Tourism](#), a cross-sector coalition working to reduce the incidence of human rights abuses in the orphanage industry by highlighting the intersection between orphanages, orphanage trafficking and modern slavery.

In 2023, through our owned media brand [Adventure.com](#), we also brought to light stories about how travellers can support slavery-related issues, under the following topics:

#### Human rights and slavery

- [Untold history: How alternative tours are presenting familiar stories in unfamiliar ways](#)
- [Should Uganda’s anti-homosexuality laws really be the “death knell” for the country’s tourism?](#)
- [What does the NAACP’s travel advisory mean for Florida?](#)

#### Supporting at-risk communities

- [Fewer than 10 tourists a day: Welcome to Timor-Leste](#)
- Orphanage tourism and voluntourism
- [Can ‘voluntourism’ outgrow the white savior stereotype and make a positive change post-pandemic?](#)

The total readership of Adventure.com is 1.5 million per annum.

# Instances of modern slavery in our supply chain in 2023

We did not uncover any instances of modern slavery in our business or in our supply chain in 2023. However, Intrepid was named in report by the Washington-based [Uyghur Human Rights Project](#) in August 2023 in regards to a trip in the northwest region of Xinjian. This previously operated as both a standalone 14-day tour, as well as part of a comprehensive 31-day combo trip. This itinerary has not operated since 2019 and was removed from the website in 2023.

## Key lessons from our work in 2023

- While modern slavery may not be immediately or obviously material to our business, it is nonetheless **ranked highly for stakeholders**.
- Because modern slavery reporting is voluntary with no consequences for non-compliance, **supplier surveys alone are an ineffective tool** to uncover instances of modern slavery.
- We experienced a **lack of awareness** of modern slavery by many suppliers.
- No matter how high the risk is in an industry, we experienced **low response rates to surveys**.
- The need for **personal intervention to secure responses** is complex, often manual and involves a large investment of time.
- Due diligence requires a tailored **country-by-country approach**.

# Our next steps in 2024

This statement was approved by the board of Intrepid Travel in their capacity as principal governing body of Intrepid Travel, 5 June 2024.

**Signed on behalf of the Board of Directors**



**James Thornton**  
Chief Executive Officer,  
Intrepid Travel

Signed: June 2024 for the fiscal year 2023 (1 January 2023 to 31 December 2023) for Intrepid Travel.

## Child protection

- Create a Child Protection Policy.
- Advance the ChildSafe trial in Thailand from two actions out of seven to five actions out of seven.

## More efficient due diligence

- Pre-qualify suppliers at high risk of modern slavery through the contracting process and leverage our vertical DMC model by training our Contracting and Operations Managers to better identify suppliers at greatest risk of modern slavery.

## Educate suppliers

- Create supplier education tools and education opportunities regarding modern slavery risk through existing procurement channels.

## Industry co-operation and advocacy

- Build consortium to share experiences and expertise.
- Maintain active involvement in industry forums and working groups and attendance at key conferences.

## Awareness

- Communicate our actions to stakeholders that nominated modern slavery as a core ESG concern – partners and customers.

# Appendix

## Progress against the 2023 commitments

Below is a checklist of the specific actions committed to in the 2022 Modern Slavery Statement and the progress update as at the end of 2023.

Topic	Action	Status	Explanation
Supply chain visibility	Launch supplier modern slavery survey in key market	Complete	<ul style="list-style-type: none"> <li>Launched to Australian office suppliers.</li> </ul>
	Survey roll out to three highest risk markets.	In progress	<ul style="list-style-type: none"> <li>China delayed indefinitely.</li> <li>Egypt delayed due to supplier uncertainty around conflict in Israel and the Palestinian Territories and ongoing supplier contracting.</li> </ul>
Policy	Implementation of the ChildSafe Movement guidelines into Thailand.	In progress	<ul style="list-style-type: none"> <li>Two of the seven requirements are complete. Complete next 5 requirements in 2024, including updating the Child Protection Guidelines.</li> </ul>
	Update Intrepid's Child Protection Policy.	In progress	<ul style="list-style-type: none"> <li>Policy draft complete. Audit against ChildSafe template required.</li> </ul>
	Review our policies and codes of conduct to ensure compliance with expected legislated change to the Modern Slavery Act (2018).	Complete	<ul style="list-style-type: none"> <li>Supplier Code of Conduct reviewed and deemed compliant.</li> <li>Supplier Handbook reviewed and updated to be compliant.</li> <li>Responsible Purchasing Policy reviewed and deemed compliant.</li> </ul>
	Update Human Rights Policy, Leader & Crew Conduct Policy, Responsible Purchasing Policy, and Grievance Procedures to make specific mention of modern slavery.	In progress	<ul style="list-style-type: none"> <li>Human Rights Policy references modern slavery in clause 1.4 (child and forced labour) regarding staff and in clause 3.3 (child and forced labour) referencing suppliers.</li> <li>The Leader and Crew Conduct Policy has been reviewed and it is not relevant to include a clause on modern slavery. No changes are required.</li> <li>The Responsible Purchasing Policy does not make any reference to modern slavery. This will require a review by the purchasing team to decide if the policy specifically requires a clause on modern slavery.</li> <li>The Intrepid grievance procedure does not specify any specific issues that might result in a staff grievance. No changes are required.</li> </ul>

Topic	Action	Status	Explanation
<b>Reporting</b>	Review the risk register to explicitly identify modern slavery as a business risk.	Complete	<ul style="list-style-type: none"> <li>Modern slavery identified as a risk in our risk register. Risk register updated with status of modern slavery risk for Intrepid.</li> </ul>
	Establish metrics to measure improvements in performance year on year in the Modern Slavery Statement.	Not started	<ul style="list-style-type: none"> <li>Not enough responses from the surveys to develop a reliable view on specific risks geographically or by industry category. Unlikely to be able to complete until the end of 2025.</li> </ul>
	Include progress report on modern slavery in quarterly updates to the Intrepid board.	Complete / ongoing	<ul style="list-style-type: none"> <li>Reports to the board, via the Audit and Risk Committee required half yearly.</li> </ul>
<b>Training</b>	Refresh modern slavery training modules.	Complete / ongoing	<ul style="list-style-type: none"> <li>Modules updated in Degreed. New learning modules included in human rights learning pathway.</li> <li>Human rights page on the internal purpose portal includes section on modern slavery.</li> <li>New training delivered virtually to 770 staff.</li> </ul>
	Achieve 90% completion of global modern slavery awareness training for all staff.	In progress	<ul style="list-style-type: none"> <li>81.9% of staff completed modern slavery training in 2023.</li> </ul>
	Translate two key modern slavery training modules from English into Chinese, Arabic, Vietnamese, and Spanish.	Revised and complete	<ul style="list-style-type: none"> <li>We sourced modern slavery learning resources available online in multiple languages from around the world and created a database of guidelines, tools and training modules from private and government organisations. Languages include Arabic, Chinese, Japanese, Spanish, Vietnamese, Farsi, Hindi, Korean, Malay, Tagalog, Thai and Urdu.</li> </ul>
	Review the trip leader training to ensure that it complies with updates to Australian Modern Slavery Act (2018).	Not started	<ul style="list-style-type: none"> <li>Pending announcement of new legislation.</li> </ul>
<b>Awareness</b>	Maintain active involvement in industry forums and working groups.	Complete / ongoing	<ul style="list-style-type: none"> <li>Founding member of the Travel Consortium for Modern Slavery (managed through the Informed365 platform).</li> <li>Joined the UN Global Compact ANZ Modern Slavery Community of Practice.</li> </ul>
	Invite keynote speaker for Intrepid staff on modern slavery.	Complete	<ul style="list-style-type: none"> <li>Modern slavery expert Robin Mellon (CEO of Better Sydney and Board Member of the UN Global Compact Network Australia) presented to key Intrepid staff on the topic of modern slavery and the legislative changes expected in Australia (13th June 2023).</li> </ul>

Topic	Action	Status	Explanation
<b>Partnerships</b>	Support of non-profit partners that are addressing the causes of modern slavery.	Complete	<ul style="list-style-type: none"> <li>Two TIF partners, Blue Dragon (Vietnam) and Patinaai Osim (Kenya), actively rescue and support victims of slavery.</li> <li>Completed social media audit of Patinaai Osim as part of Intrepid's volunteer program. The Intrepid East Africa team visited the project in November 2023.</li> </ul>
<b>Advocacy</b>	Publish two articles related to modern slavery.	Complete	<ul style="list-style-type: none"> <li>Article published inviting travel businesses to join the <a href="#">Modern Slavery Travel Consortium</a>.</li> <li>Article published encouraging businesses to <a href="#">consider paying staff a living wage</a>.</li> </ul>
	Present as part of a tourism panel on the risks of modern slavery in the tourism supply chain.	Complete	<ul style="list-style-type: none"> <li>Presented at the <a href="#">Flight Centre Partnership Summit</a> on 17 October 2023, in Melbourne.</li> </ul>
	Maintain membership of current networks and expand to include membership to an industry specific modern slavery advocacy group or network.	Complete / ongoing	<ul style="list-style-type: none"> <li>Note that there are no tourism specific advocacy groups/networks and that we are in the process of creating one with Flight Centre.</li> <li>Founding member of the Travel Consortium for Modern Slavery (managed through the Informed365 platform).</li> <li>Member of the UN Global Compact ANZ Modern Slavery Community of Practice.</li> </ul>
	Attend one modern slavery conference.	Complete	<ul style="list-style-type: none"> <li>Attended the Commonwealth Attorney-General Department's 2023 Modern Slavery Conference, in conjunction with the Australian Institute of Criminology, in June 2023.</li> <li>Attended the UN Global Compact Network Australia's (UNGCNA) Human Rights dialogue in August 2023.</li> </ul>
<b>Grievance mechanisms and remediation</b>	Explore how we can improve our whistleblower process including better addressing modern slavery grievances.	Not started	<ul style="list-style-type: none"> <li>The Intrepid grievance procedure relates to staff grievances. A review of the processes is required.</li> <li>There is no formal grievance mechanism for suppliers or the staff of suppliers to make a complaint to Intrepid.</li> </ul>

