

Travel Chapter Human Rights Policy

Purpose

Travel Chapter believes that respecting human rights is fundamental to operating as a responsible business and creating long-term value for all stakeholders. The Company recognises that its success depends upon maintaining trusted relationships with employees, homeowners, guests, suppliers, investors, local communities and wider society.

This Policy establishes Travel Chapter's commitment to respecting internationally recognised human rights throughout its operations and business relationships. Human rights considerations are integrated within the Company's Public Purpose, Sustainability Strategy and Stakeholder Governance Framework rather than being treated as a standalone compliance exercise. The Company seeks to identify, prevent, mitigate and address actual or potential adverse human rights impacts while supporting positive social outcomes through responsible business practices.

Scope

This Policy applies across all activities undertaken by Travel Chapter under its operational control and extends, where appropriate, throughout the Company's wider value chain. It applies to employees, directors, temporary workers, agency workers, contractors, consultants, suppliers, service providers and business partners.

Although Travel Chapter does not own the holiday properties advertised through its brands, the Company recognises that its relationships with homeowners, guests and operational partners provide opportunities to promote responsible business practices throughout the visitor economy.

Our Commitment

Travel Chapter is committed to respecting internationally recognised human rights and conducting business in accordance with the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, ILO Core Conventions, OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UK Modern Slavery Act 2015 and applicable employment, equality, health and safety and human rights legislation.

The Company does not tolerate forced labour, human trafficking, child labour, unlawful discrimination, harassment or intimidation and is committed to providing a safe, healthy and inclusive working environment.

Human Rights Governance and Due Diligence

Responsibility for oversight rests with the Board of Directors and is delegated day-to-day to the ESG & Stakeholder Governance Committee.

Travel Chapter applies a continual due diligence cycle: identifying risks through stakeholder engagement, supplier due diligence, materiality assessments, grievance mechanisms and legislative monitoring; assessing risks according to severity, likelihood and affected stakeholders; preventing and mitigating impacts through operational improvements, supplier engagement and governance oversight; monitoring effectiveness through ESG governance; providing or cooperating in remediation where the Company has caused or contributed to adverse impacts; and reviewing the effectiveness of the process annually as part of the Sustainability Strategy and Materiality Assessment.

Implementing Our Commitments

Human rights considerations are embedded within recruitment, procurement, supplier onboarding, stakeholder engagement and sustainability governance.

Suppliers are expected to prohibit forced labour, bonded labour, child labour and human trafficking, provide safe and healthy working conditions, comply with employment legislation, promote equality and non-discrimination, respect workers' rights where protected by law and cooperate with reasonable ESG and human rights due diligence activities.

Where concerns relating to supplier practices are identified, Travel Chapter seeks to work collaboratively with suppliers to implement improvements before considering escalation where appropriate.

Speaking Up, Protection from Retaliation and Remedy

Travel Chapter encourages employees and external stakeholders to raise concerns where they believe actual or potential human rights impacts may have occurred through the Stakeholder Grievance Procedure, whistleblowing arrangements or other established reporting mechanisms.

The Company prohibits retaliation against anyone raising concerns in good faith. Where investigations identify that Travel Chapter has caused or contributed to an adverse human rights impact, it will seek to provide or cooperate in appropriate remediation consistent with the UN Guiding Principles. Any conflict of interest in investigations will result in escalation to the ESG & Stakeholder Governance Committee or Board.

Monitoring, Reporting and Continuous Improvement

Implementation is monitored through supplier due diligence, grievance trends, employee feedback, stakeholder engagement, Modern Slavery compliance activities, materiality assessments and ESG governance.

The ESG & Stakeholder Governance Committee reviews implementation and reports to the Board where appropriate. The Policy is reviewed at least annually and updated in response to legislative developments, stakeholder expectations, governance reviews and emerging human rights risks.

Governance Framework and Related Documents

This Policy forms part of Travel Chapter's integrated governance framework and should be read alongside the Public Purpose Statement, Sustainability Strategy, Stakeholder Governance Policy, Materiality Assessment Methodology, Stakeholder Grievance Procedure, Responsible Marketing & Public Relations Policy, Supplier Onboarding Assessment Questionnaire, Employee Handbook, Modern Slavery Statement and ESG Committee Terms of Reference.