

The background of the top half of the page is a photograph of several book spines. The books are arranged on a shelf, and the focus is on the edges of the pages, which appear as a series of fine, parallel lines. The colors of the spines are muted, with some showing hints of blue and red. The overall lighting is soft and natural.

Slavery and Human Trafficking Statement

Our Commitment to helping fight modern slavery in the 21st Century

INTRODUCTION FROM THE DIRECTORS

We are committed to improving our practices and checks to help combat slavery and human trafficking across the globe. The Walk Free Foundations Global Slavery Index estimated in 2016 that more than 40,000,000 people across the globe are living in slavery. The lack of reliable data from country to country could well increase that figure significantly, and business have their role as well as Governments to combat slavery in the 21st century.

In respect of our own business operations, a considerable level of our trade is based on our United Kingdom based customers travelling to destinations across the globe, with a focus on Asia and the Middle East. Part of our commitment is met by our emphasis on working with long established and reputable destination management companies in our destination locations, which we can refer to as our suppliers. Our close relationship with our suppliers means that typically at least once a year, our staff or our staff in our affiliated offices visit our locations offered on our website. As well as checking that accommodation and facilities are to the expected level, health and safety checks are carried out as well as checks on the business practices of our suppliers, including the welfare of their staff and those working with those suppliers. Of course, there are limitations to what can be reasonably monitored but the long establishment of our suppliers and their openness and willingness to share information with us is reassuring.

In the coming years, we will be implementing due diligence checks as part of our contractual requirements for suppliers. As well as requiring full details of employees and other workers for our main suppliers, we will require suppliers allow us to audit and directly communicate with local staff of those suppliers. We feel that asking business partners to complete checklists will not achieve the aims of this business, nor those of the underlying ethos of the Modern Slavery Act 2015.

ORGANISATION'S STRUCTURE

We are a travel agency operating under licence in the United Kingdom and regulated by the Civil Aviation Authority. We are part of the Lyca family of brands and affiliated to the Lyca group of companies. LycaFly has around 50 employees on a permanent basis and operates in the United Kingdom for residents of the United Kingdom.

OUR BUSINESS

From a consumer perspective, our business can be divided into flight sales in our capacity as a ticketing agent for a very large number of airlines operating around the world and as a holiday provider in our capacity as a travel agent. Our consumer business also includes visa processing services for consumers as well as offering ancillary services associated with the provision of travel agency services. We also operate a business to business travel arm as well as a specialist sports travel division. Our Head office is in Canary Wharf and we have two branch offices in East Ham and Wembley.

OUR SUPPLY CHAINS

Our supply chains include what are commonly known as destination management companies (DMCs) who provide services ranging from accommodation sourcing to a complete airport pick up, hotel, tours and comprehensive support to our customers in co-ordination with ourselves. We also use the services of airlines for our customers, but our identified risks are in our choice of DMC provider in certain locations.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our due diligence processes form part of our policy and these are set out below.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Our suppliers are categorised by destination and although the information on slavery suggests we are at a lower risk with the majority of our business being in low risk countries, it does not necessarily mean that our obligations can be met simply by assessing risk on a country by country basis.

Our sector is potentially at risk but as our business is a service sector business, the risks are less than those operating in the manufacturing sections, as an example. However, as part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

Our policy is applied to our supply chain and several diligence checks take place before any new supplier is engaged for services. Included in that policy, our actions typically include (but are not limited to):

- Having face to face meetings with our suppliers, typically on-site, in country, to get a good impression of the type of supplier we are potentially conducting business;
- Asking questions about staff at those meetings and meeting staff of our suppliers;
- Conducting our own audits of sites and staff;
- Asking our customers if they had any concerns or had identified any problems on their journey;
- Being free to move around supplier sites without restriction; and
- Going with our gut feeling and acting where necessary.

This is part of our strategy to mitigate risks identified by our business processes.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

FUTURE MONITORING OF OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

In the future, once we have completed our first year of this process, we will be generating quantified metrics and statistics on the checks we have carried out. This will include the following:

Vetting procedures. The number or percentage of suppliers and sub-contractors that have been vetted for ethical labour practices.

Screening. The number and type of problems identified on screening suppliers and sub-contractors.

Subcontractor inspections. The number of inspections of sub-contractors in at risk suppliers and countries.

Whistleblowing. The number of reported breaches in the past year.

Training. The number or percentage of staff trained.

Remedial action. The instances of remedial action being needed, or action steps taken.

Signed electronically by the Directors:
Aiadurai Sivasamy Premanathan
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