



# MODERN SLAVERY STATEMENT 2024

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### I. INTRODUCTION

This Modern Slavery Statement ("Statement") is made pursuant to section 54 of the Modern Slavery Act 2015 and outlines the steps that Down Fare, Inc. and its subsidiaries ("Down Fare") have taken and will continue to take to prevent Modern Slavery within our business and supply chain.

**Definition of Modern Slavery:** Modern Slavery includes:



- Human trafficking;
- Forced labor;
- Coercion or threats of harm;
- Control through abuse, either physical or psychological;
- Dehumanization, treating individuals as commodities;
- Physical restriction of movement or confinement.

Down Fare maintains a zero-tolerance stance against any form of Modern Slavery. We are dedicated to conducting business ethically, with integrity and transparency. We are committed to implementing effective systems and controls to prevent Modern Slavery in our operations and supply chain.

## II. BUSINESS ACTIVITIES

Down Fare, Inc. Delivers comprehensive global travel solutions, specializing in hotel, flight, activity, and car rental reservations, as well as vacation packages, cruises, and hotel distribution. Headquartered in Lewes, Sussex County, Delaware, as of April 18, 2024, the company works and manages reservations for approximately 2.5 million properties+ across over 90 countries and territories, including more than 375,000 hotels and resorts chains and 2.7 million unique lodging options. Additionally, Down Fare, Inc. offers flight services globally in over 48 countries, in-destination tours and activities actively in 1,240 cities+, and car rentals at around 1,000 locations worldwide (and still growing). We also provide ground transportation at over 1,300 airports globally, supported by multilingual customer service in over 40+ languages, solidifying our status as a premier choice for travelers around the world.

## III. RESPONSIBILITIES

Down Fare confirms that, to the best of our knowledge, there is no Modern Slavery in our supply chain or within any part of our business. We recognize that ongoing vigilance is necessary to uphold this commitment.

We do not engage with any organization that knowingly supports or engages in Modern Slavery. Down Fare adheres to all applicable employment laws in our operating jurisdictions and, in many cases, exceeds these requirements.

## IV. RISK ASSESSMENT AND DUE DILIGENCE

At Down Fare, Inc., we are dedicated to upholding the highest ethical standards and respecting human rights across all facets of our global operations. Guided by internationally recognized principles, including the UN Guiding Principles on Business and Human Rights, we actively work to prevent and address modern slavery in all its forms, including forced labor, human trafficking, and child labor.

We are committed to maintaining transparency and integrity in our practices. Our Code of Conduct, which emphasizes Absolute Integrity, applies to all employees, directors, and officers globally, reinforcing our



dedication to ethical behavior and respect for human rights. Similarly, our Supplier Code of Conduct mandates that all partners uphold stringent ethical standards and refrain from using forced or coerced labor.

We have established robust mechanisms for reporting human rights concerns, including a Compliance Helpline accessible to both internal and external parties. This is part of our broader strategy to manage and mitigate risks related to modern slavery, particularly in high-risk sectors such as accommodation, transportation, and retail.

Our commitment extends to fair pay practices, comprehensive contractual clauses, and rigorous screening procedures. We regularly review and update our agreements to ensure compliance with legal protections against modern slavery. Additionally, we collaborate with independent experts for risk assessments and continuously enhance our detection and response capabilities to address and prevent human trafficking on our platforms.

Through these initiatives, Down Fare, Inc. strives to create a safer and more ethical global travel experience, ensuring that all stakeholders are treated with dignity and respect.

Our most recent risk assessment did not identify specific Modern Slavery risks related to Down Fare's activities. Nevertheless, we commit to:

- Ensuring all employees are legally employed and paid at least the minimum wage;
- Providing safe and hygienic working conditions;
- Monitoring working hours to prevent excessive demands;
- Requiring vendors to ensure their subcontractors adhere to similar standards;
- Strengthening supplier engagement through our procurement team;
- Enhancing workforce awareness and understanding of Modern Slavery issues;
- Publishing this Statement on Down Fare's website for public access.

Our commitment to corporate social responsibility standards, including health, safety, and ethics.

## V. OUR COMMITMENT

Down Fare enforces a range of internal policies to ensure ethical and transparent business practices. This Statement complements our recruitment, procurement, grievance, equal opportunities, anti-bribery, human rights, and whistleblowing policies. We conduct eligibility checks for all employees to prevent Modern Slavery.

Our Code of Conduct and Third-Party Code of Conduct reinforce our commitment to preventing unethical conduct. These Codes require employees and third parties to report any concerns regarding wrongdoing to their supervisors. Compliance with these Codes is mandatory, with violations subject to disciplinary actions.

Through our Third-Party Code of Conduct, publicly available on our website, we expect vendors to:



- Actively work to eliminate Modern Slavery within their operations;
- Hold their vendors accountable for similar practices;
- Ensure employees receive at least the national minimum wage and any applicable prevailing minimum wage.

We encourage employees, suppliers, subcontractors, and other business partners to raise questions or concerns regarding our Codes. Reports can be made via our Whistleblower Hotline at [whistleblower hotline contact] or our secure online form at [whistleblower form URL]. No retaliatory actions will be taken against individuals reporting concerns in good faith.

## VI. PERFORMANCE INDICATORS

We gauge the effectiveness of our measures against Modern Slavery through the absence of reports from employees, the public, or law enforcement indicating any Modern Slavery practices.

## VII. APPROVAL

This Statement was approved and signed by the Board of Directors of Down Fare, Inc. on August 10, 2024.

For and on behalf of Down Fare, Inc.:

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CEO  
August 10, 2024

For and on behalf of Down Fare, Inc.:

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Director  
August 10, 2024