

## **WORLDVENTURES**

### **Modern Slavery Act Transparency Statement**

#### **Our commitment to combatting modern slavery**

WorldVentures is committed to corporate responsibility and our belief that everyone should be treated with dignity and respect. We expect that all those within our business and supply chain reflect our values. We therefore expect our suppliers to abide by all applicable laws, including ensuring that modern slavery and human trafficking play no part in their business, and we are committed to working with and encouraging our suppliers to uphold the principles in this statement.

#### **Our organisational structure and our business**

WorldVentures is the world's largest direct seller of curated group travel. The company is truly multi-national, with independent representatives in 28 countries. The business in the UK is presently carried out through WorldVentures Marketing, LLC, Rovia, LLC, and WorldVentures Events Limited. WorldVentures Holdings LLC is our ultimate parent company, based in Texas, USA.

#### **Our staff**

Maintaining a fair and ethical workplace is essential to us. Our core values include expanding trust and promoting excellence, and this can only be achieved by ensuring a fair working environment for all our employees. It goes without saying that all forms of forced labour are strictly prohibited

We ensure that we comply with all applicable employment legislation relating to employee recruitment and terms and conditions, including right to work evidence and ensure that no UK staff in the UK offices are paid less than the living wage.

#### **Our supply chains**

As a provider of worldwide vacations and experiences we have a wide and varied supply chain. It includes working with hotels and trusted partners to provide an exceptional experience for travellers.

We also have many Independent Sales Representatives involved in selling WorldVentures travel products and building sales organizations by recruiting, training, and motivating others to do the same.

#### **Our policies in relation to slavery and human trafficking**

We operate a values and commitment based culture. Our core values form the key tenets of our business and underpin all that we do. This includes caring and contributing, and fostering safe and open communications.

As part of our commitment to combatting modern slavery and human trafficking, we have also implemented a Business Ethics and Conduct policy. This includes express obligations on all directors, officers and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct. It also provides a route through which questions or concerns can be raised for advice and consultation.

#### **Our due diligence processes**

We expect all our contractors, suppliers and other business partners to adopt the same high standard as we do in the pursuit to prevent modern slavery, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

We regularly take steps to identify the areas of our business and supply chains that are most at risk in relation to modern slavery and human trafficking.

### **Assessing and managing risk**

We are aware that, in some cases, operating in the hospitality industry and using partners based across the world can create a higher risk of modern slavery. To address these risks we look to develop partnerships with suppliers so that we have a greater understanding of how they work, and they understand our standards and expectations. We also remain vigilant to any activities which might give cause for concern.

### **Looking ahead**

We will look to establish internal accountability, and provide relevant personnel with training to recognise environment, health, safety, and labour/worker concerns, including issues relating to slavery, human trafficking and forced labour, and to report and investigate suspicions of improper conduct at all suppliers globally. Part of this means that if any of our suppliers are found to be falling foul of the standards we set, we will look to work with them to redress our concerns and, if necessary terminate our relationship with them.

We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking to target areas of its business where there is a potential risk of modern slavery. WorldVentures General Counsel is responsible for checking and testing the success of our commitments, and will work to ensure we meet our expectations.

This statement has been made pursuant to section 54(1) of the UK Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for WorldVentures Marketing, LLC, Rovia, LLC, and WorldVentures Events Limited and their subsidiaries that fall within the scope of the Modern Slavery Act 2015 (collectively the "Group") for the financial year ending 31 December 2016. It sets out the steps taken by the Group during the financial year to prevent modern slavery and human trafficking in its business and supply chains.



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Signed on behalf of the Group