



The non-profit and  
academic travel experts

# Anti-Modern Slavery and Anti-Human Trafficking Statement



# ANTI-MODERN SLAVERY and ANTI-HUMAN TRAFFICKING STATEMENT

## 1. Introduction

DGi is committed to preventing acts of Modern Slavery and Human Trafficking from occurring within its business and supply chain and imposes the same high standards on its customers and suppliers.

This Statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes DGi's Modern Slavery and Human Trafficking Statement for the financial year 2026/27, commencing 1<sup>st</sup> April 2026 and ending 31<sup>st</sup> March 2027.

## 2. Structure of the Organisation

DGi is a Travel Management Company registered in the UK and is exclusively dedicated to the Not For Profit sector, including humanitarian, academic, charity and faith-based organisations. We are a global company with presence in several geographies including the UK, USA and Europe, through a mixture of physical offices and homeworkers and serve customers in a number of continents including the US, Europe, Africa and Asia.

In order to carry out its business, DGi works with a range of suppliers of goods and services that support business activities. These goods and services include but are not limited to the following:

- Facilities, e.g. office accommodation management and maintenance.
- Professional Services, e.g., temporary staff and consultancy.
- Travel suppliers, e.g. airlines, hotel chains, taxi firms, etc.
- IT, e.g., telecoms, hardware and software.
- HR, Health & Welfare, e.g. Occupational Health, Employee Assistance, Health Care cover, HR/Payroll software, Payroll & Pensions provisions.
- Commodities, e.g., resources and office supplies.

## 3. Policies and Procedures

As part of our commitment to combating Modern Slavery, DGi has implemented the following Policies and Procedures:

- Corporate Social Responsibility
- Whistleblowing
- Employee Code of Conduct (in Employee Information Handbook)
- Equality, Diversity & Inclusion (E,D&I) Policy & Plan

All policies are reviewed annually and are in place to ensure that the Company adheres to strict procedures and processes which include:

### Whistleblowing (Public Interest Disclosure) Policy and Procedure

Where there are concerns about malpractice or impropriety that are not adequately covered by the Company's other Policies or Procedures, and which may be in the public interest, staff are encouraged to make a Public Interest Disclosure, or to 'blow the whistle'. This Policy and Procedure, therefore, provides an additional means for people to raise concerns about a supply chain or an individual or group who may be at risk.

## □ **Employment (HR) Policies and Procedures**

DGi carries out thorough and appropriate vetting checks when recruiting new employees and when engaging workers and volunteers, to ensure that their employment or work, complies with relevant and current employment laws. We are also a 'Living Wage employer' which means that as a business, we have committed to pay our staff at or above the National Living Wage rate.

The company also ensures that its suppliers are aware of all company Policies and Procedures and seeks confirmation from suppliers prior to contracting, that they adhere to the same high standards.

All company Policies and Procedures, HR/Employment-related and otherwise, are developed by the appropriate Department and are approved by the CEO. Where necessary, Policies and Procedures may also be ratified by the Board.

## **4. Due Diligence**

As part of DGi's efforts to monitor and reduce the risk of Modern Slavery and Human Trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- All those working for the company, or on our behalf, in any capacity, including contractors, external consultants, agencies, third-party representatives, and business partners/suppliers ("Third Parties") are required to complete our Modern Slavery Act Due Diligence Questionnaire, along with our other due diligence checks to ensure they fully adhere to our standards and commitments.
- Our Modern-slavery policy is shared with all Third Parties and requires written confirmation that the policy has been read and fully understood and will be complied with.
- Employees at all levels; managers, directors, agency workers, seconded workers, consultants, and others, are required to adhere to our Modern Slavery Policy and avoid any activity that might lead to, or suggest, a breach of this Policy. A copy of our Policy is sent to all those mentioned, and we require signed confirmation that this Policy, along with our other Policies has been read and understood.
- We have clear reporting guidelines and expectations for any staff member or Third Party who may believe or suspect a breach has occurred and will fully investigate all reports received.
- Any staff member or Third Party who breaches our Policy may face Disciplinary action or termination of our business relationship.
- At the point of recruitment and appointment of new staff and prior to their commencement date, the People Team ensures that all appropriate pre-employment checks have been carried out, and clearances obtained, for all prospective employees, workers and volunteers, including staff supplied by recruitment agencies on (or not on) the company's Preferred Supplier List (PSL).

Company Policies and Procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains;
- Monitor potential risk areas in our business and supply chains;
- Reduce the risk of Modern Slavery and Human Trafficking occurring in our business and supply chains.

## **5. Risk and Compliance**

The nature and the extent of the company's exposure to the risk of modern slavery occurring in our supply chain is continually evaluated, by reference to our Due Diligence procedures.

DGi enforces a strict code of compliance and does not tolerate Modern Slavery and Human Trafficking within its supply chains. If/where a potential risk is identified, DGi will immediately seek to terminate its relationship with the relevant supplier/customer.

### **i) Prohibition of Child Labour and Forced Compulsory Labour**

We are committed to upholding and safeguarding human rights. We understand and recognise the importance of preventing all forms of modern slavery, including child labour and forced or compulsory labour, within our operations and supply chain. We believe that a proactive, transparent, and collaborative approach is crucial in eliminating these grave human rights violations. Through this policy, we urge our stakeholders, colleagues, and suppliers to report any concerns related to potential breaches of this policy.

### **ii) Child Labour**

DGi categorically prohibit the use of child labour in any stage of our operations or supply chain. We abide by the standards set by the International Labour Organisation's (ILO) conventions and UK, EU and International legal requirements pertaining to the minimum age of employment.

### **iii) Forced or Compulsory Labour**

Forced or Compulsory Labour are violations of fundamental human rights. DGi will not tolerate, engage in, or advocate the use of forced or compulsory labour at any time or in any way. We ensure that all our colleagues have freedom of movement, and are not subjected to any form of physical or psychological coercion or control, and are free to choose to leave their employment after giving reasonable/contractual notice. It is a requirement of our suppliers, customers and partners to adhere to the same standards.

## **6. Awareness Raising**

DGi invests heavily in the education of all staff, and through mandatory and additional voluntary training programmes, employees are encouraged to identify and report potential breaches of the law. Evaluation of interventions are carried out at regular intervals to assess and ensure effectiveness.

## **7. Review and Possible Future Actions**

The People Team and Finance Team will jointly conduct an annual review of measures implemented each financial and academic year to prevent Modern Slavery or Human Trafficking from occurring in the company's business or supply chains, will take place, to tackle Modern Slavery and Human Trafficking. If and when appropriate, this may include:

- A review of due diligence procedures to ensure supplier compliance with Modern Slavery and Human Trafficking laws;
- A formal review of the company's exposure to risk of Modern Slavery and Human Trafficking in its supply Chains;
- Development of some Key Performance Indicators (KPIs) to measure and chart success in safeguarding against Modern Slavery and Human Trafficking in any part of our business or its supply chains;
- Modern Slavery and Human Trafficking training for staff who are responsible for, or regularly involved in, the procurement of goods and services on behalf of the company.