



HBX Group

Modern Slavery and Human Trafficking

Statement for HBX Group

Statement for Financial Year 2024

This statement is made pursuant to s.54 of the United Kingdom Modern Slavery Act 2015 ("Modern Slavery Act").

HBX Group is committed to ethical working practices and maintaining integrity and transparency in all dealings with employees, clients, business partners, suppliers, and authorities.

HBX Group understands that slavery can occur in several forms, including forced labour, workplace abuse, domestic servitude, child labour and human trafficking ("Modern Slavery"). We are committed to putting in place effective controls to safeguard against any form of Modern Slavery occurring within our business or supply chain.

Our organisation

HBX Group, is a leading TravelTech company. Operating under the HBX Group brand in the wholesale channel and the Bedsonline brand in the travel agents' channel, the company connects over 60,000 travel intermediaries across more than 190 source markets globally in 170 destination countries representing more than 250,000 properties, global transfer routes coverage, 23,000 experiences and 500 car rental suppliers.

The company is headquartered in Palma (Spain) and employs more than 3,600 employees in more than 50 countries as of 31 December 2024.

Our policies

HBX Group operates a several number of internal policies and practices to help ensure that we are conducting business in an ethical and transparent manner, including:

- [HBX Group Code of Conduct](#). The Code of Conduct sets the framework around how HBX Group employees work together to deliver products and services globally. It gives clarity to employees and everyone HBX Group deals with about how the company does business. It sets out what HBX Group stands for.
- [Environmental, social and governance policy](#). This policy reflects HBX Group' commitment to sustainable best practices in all aspects of the business, with a particular focus on employees, company culture, the environment and local communities.



- [Child Protection Policy](#). This policy defines HBX Group' commitment to child protection by setting out the actions and practices taken in order to contribute to the eradication of the Commercial Sexual Exploitation of Children and Adolescents.
- [Animal Welfare Policy](#). This policy has been created to promote responsible practices among our suppliers to ensure best animal treatment practices, compliance with relevant national and international legislation and to meet clients' expectations.
- [Supplier Code of Conduct](#). This code sets out the minimum standard of ethical conduct, values and principles HBX Group expects from suppliers, contractors and agents.

Our Suppliers and Third parties

HBX Group requires its Suppliers to comply with the national, supranational and international legislation and related procedures, restrictions and sanctions in relation to human rights and labour law; supporting local communities, identifying and monitoring bribery and corruption risks, identifying and monitoring negative environmental impacts; and introducing/maintaining quality assurance and Health and Safety policies in their business.

The HBX Group Supplier Code of Conduct sets out the minimum standards HBX Group expects from Suppliers in their relationships with workers, agents and customers throughout the supply chain and requires that Suppliers:

1. Adhere to International Labour standards by treating workers with respect and ensuring that relevant information on employee rights is easily accessible;
2. Will not employ anyone against their will, traffic, use forced, bonded, compulsory or prison labour;
3. Must ensure no slavery or human trafficking operates in their business or supply chain; and
4. Must ensure that employees have the correct visa and working documentation in place and ensure that written contracts for direct and contract workers exist.

As part of our contracts with suppliers, we require that they acknowledge and comply with the Modern Slavery Act, and at our request, provide us with any information or reasonable assistance to enable us to identify potential risks in the supply chain. We reserve our right to terminate a supplier's contract in the event that any instances of Modern Slavery are discovered.

**Training**

HBX Group provides training on modern slavery, in which employees are introduced to the various forms of modern slavery, contributing factors, high-risk sectors in our industry, ways to identify signs of slavery, and on how to advocate for the ongoing fight against modern slavery.

Complaint mechanisms

HBX Group has incorporated in the help line, a specific channel for reporting cases of modern slavery, in order to eradicate any breach of human rights, in particular forced labour.

Monitoring

We will continue to monitor and improve our performance and success in preventing modern slavery and human trafficking from taking place in our business and supply chains by reference to reports and alerts from our staff, customers, suppliers, partners, the public, non-government organisations and law enforcement agencies.

Approval for this statement

This statement was approved by the Board of Directors on 12 March, 2025

Richard Solomons

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Non-Executive Chairman HBX Group