

## **Noble Caledonia Ltd**

### **Slavery and Human Trafficking Statement**

**Noble Caledonia is committed to improving our practices to combat slavery and human trafficking.**

#### **Our Business**

We are a provider of cruise arrangements and other non-cruise holidays in the travel industry sector. We employ approximately 70 employees and, while we primarily operate in the United Kingdom, we provide cruise services that take place around the world.

We have a global annual turnover of £84.491 million.

#### **Our Structure**

Our business structure includes a board of directors that is responsible for determining the overall direction of the company and a team of experienced managers that is responsible for the day-to-day operation of the company. We also have several departments – marketing, sales, customer services, operations, etc – that are tasked with the arrangement and delivery of the holidays that we provide and the various other activities that are associated with the provision of those holidays. Further, we have recently established the Noble Caledonia Charitable Trust, which is involved with various charitable causes around the world.

#### **Our Supply Chains**

Our supply chains include the procurement of goods, services and workers from national and international suppliers. For example, we engage management companies who provide on-board staff members, as well as fuel and waste management services. We also contract with cruise ship providers around the world; along with suppliers of accommodation and land arrangements such as shore excursions and transfers etc.

#### **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.

#### **Due Diligence Processes for Slavery and Human Trafficking**

We take steps, wherever we are able to, to ensure that our suppliers comply with the Maritime Labour Convention 2006, which requires measures to be in place to both promote and protect seafarer's employment rights.

#### **Further Steps**

We are committed to reviewing our systems and procedures relating to our supply chain to identify and address risks that may arise in connection with Modern Slavery and Human Trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2018.

Signed:

A handwritten signature in blue ink, appearing to read 'Tim Cochrane', written over a faint horizontal line.

Tim Cochrane  
Managing Director  
Noble Caledonia Limited

Date: 3rd September 2018