Modern Slavery Statement 2017

Pursuant to section 54 (1) of the Modern Slavery Act 2015, this is our 2017 statement outlining the actions taken by Travelljigsaw Limited (trading as Rentalcars.com) (the “Company”) for the financial year ending 31 December 2017. The statement was approved by the Board of Directors pursuant to section 54 (6) (a) on the 26 July 2018.

Our business

Travelljigsaw Limited is the trading company for three business units (Rentalcars.com, RentalcarsConnect and Rides (Rideways.com), which provides a range of car rental and ground transportation services globally.

The Company and its subsidiaries (“we, us and our”) employ over 1,600 people at 2 locations in Manchester and London.

We recognise that Modern Slavery in all its forms (slavery, human trafficking, forced labour, debt bondage, descent-based slavery, servitude, child slavery and forced and early marriage) is a global issue. Modern Slavery is an increasing problem due to the rise in global migration and one that exists in every region of the world.

Whilst our operations place us at a low risk of exposure to Slavery, including Human Trafficking issues, we have a zero-tolerance approach to Modern Slavery within our own organisation and supply chain, and with our affiliates. At all levels, there is an intrinsic expectation to report any and all concerns through appropriate reporting routes and our management body is required to act upon the same.

Our supply chain

We do not act as a producer, manufacturer, or retailer of any physical goods – and as a provider of car rental and ground transportation services, we have a relatively straightforward supply chain.

We provide services to our customers and affiliate partners globally from our offices in the U.K. A small proportion (less than 20%) of our customer support operations have been outsourced to partner companies based in Poland, Bulgaria and Japan. Our car rental and ground transportation services are provided by suppliers located in many of the countries in which the car rental and ground transportation services are purchased by our customers.

Our policies

Our policies include our Modern Slavery Policy, our Core Values and our Code of Conduct, within which we endorse our robust adherence to human rights and our zero-tolerance approach to Modern Slavery within any part of our business or our supply chains.

We operate a reporting Helpline and place a duty upon all employees to report either potential or actual violations either to their line manager, to the Compliance Team or to the Helpline. We have a zero-tolerance stance on retaliation against whistle-blowers who report in good faith and our non-retaliation stance is set out in our Code of Conduct.

We take all allegations seriously. All reports are thoroughly investigated and if appropriate, remedial action will be taken.

We recognise our role in seeking assurance from our suppliers of their compliance with the Modern Slavery Act 2015, whilst acknowledging that this remains our suppliers’ responsibility.
Provisions on ethical business practice are included in new, renewed and existing agreements with suppliers and affiliate partners.

The requirement for new suppliers and partners to sign up to our ethical business provisions sets a clear example of our expectations and our commitment to ensuring that Modern Slavery does not form part of our supply chain.

We have been and remain committed to paying our employees not less than the current Living Wage, which exceeds the National Minimum Wage. Since 2017, we have also commissioned Mercer, one of the world’s leading HR Consultants, to carry out an independent audit on gender pay within our organisation. They concluded that we have no systematic pay bias.

**Actions completed so far**

After assessing and considering the impact of the Modern Slavery Act on the business, we completed the following actions:

**Company Modern Slavery Policy** – First published in 2016, the CMSP is available to all staff via the intranet and can be accessed at any time.

**Contractual Clauses** – Notwithstanding that Modern Slavery, including Human Trafficking, is of a low risk to the Company, supplier contracts include provisions obligating suppliers to comply with the Modern Slavery Act and we hold suppliers to the same standards that apply to our own business. We adhere to a policy that we would rather lose business than achieve it through unethical or illegal means. If, after enquiry, any organisation within our supply chain is unable to demonstrate their commitment to their obligations, either they will not be taken on as a supplier or existing services will be terminated.

**Helpline** – There has been an increased focus and promotion on the utilisation of the Helpline reporting facility to encourage all employees to report any perceived or actual ethics and compliance breaches. All reports are thoroughly investigated and action is taken where appropriate.

**Training** – We require all of our employees to complete mandatory training courses dealing with ethics and compliance subjects. We continuously review employees’ completion rates of compulsory modules and have an escalation process in place should any employee fail to complete the same within the set timeframe.

**Future actions**

**The Modern Slavery Register** – At the present time there is no central governmental register to host Modern Slavery Statements. There is, however, a Central Registry for Modern Slavery Statements (‘the Registry’) operated and controlled by the Business and Human Rights Resource Centre (‘BHRRC’). The Registry is ‘guided and supported by a governance committee which includes: Freedom Fund, Humanity United, Freedom United, Anti-Slavery International, the Ethical Trading Initiative, CORE Coalition, UNICEF UK, Focus on Labour Exploitation, Trades Union Congress and Oxfam GB’1. We plan to submit our Modern Slavery Statement to the BHRRC for review, verification and (subject to its acceptance) addition to the Registry.

**Further Employee Training** – We plan to make Modern Slavery training even more prominent by introducing an on-line training module for our employees, which is separate to other ethics and compliance training and which will focus solely on Modern Slavery issues.

**Due Diligence** – We are currently reviewing our due diligence processes including Know Your Client checks to add appropriate questions in to this regarding Modern Slavery.

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1 [www.modernslaveryregistry.org](http://www.modernslaveryregistry.org)
Signed for and on behalf of the Board by

Ian Brown

Chief Executive Officer
TravelJigsaw Limited