

INGHAMS
SANTA^S LAPLAND

MODERN SLAVERY POLICY
2026



Our stance on Modern Slavery

Inghams and Santa's Lapland are committed to making ethical business choices. We have zero tolerance for any form of human rights abuse - including modern slavery or human trafficking - in any part of our business or those of our partners and suppliers. We strive to develop and maintain systems and controls that safeguard against slavery and human trafficking in our supply chain to fulfil this commitment.

It is our responsibility to have a Modern Slavery policy that is robust, clear and well communicated to ensure that our holidays are ethical and there is zero exploitation of the people and communities we visit.

Tourism businesses typically have a complex supply chain. Numerous stakeholders including ground agents, tour leaders, accommodation, transport providers and restaurants contribute to the holidays that Inghams and Santa's Lapland provides. In addition, we rely upon an enormous network of indirect suppliers - for example, companies that provide laundry services at hotels.

We want to deliver holidays that enrich the lives of our customers, our staff, our partners and the communities we visit.

What is Modern Slavery?

Modern slavery is the practice of making money or obtaining benefits and services as a result of the exploitation of others. Sometimes also referred to as forced labour and sometimes linked to human trafficking, modern slavery occurs where victims are controlled, forced, coerced or deceived and exploited for a profit by another person. Perpetrators restrict victims in their movement, unlawfully withholding their wages and/or passport, and use threats or violence to force the victims to work under duress.

Debt bondage/bonded labour is the world's most widespread form of slavery. This occurs when people trapped in poverty borrow money to access employment opportunities. Victims are often forced to work to pay off an excessive amount of debt whilst being paid little to no wages, losing control over both their employment conditions and the debt.

Term	Definition
Modern Slavery	This is a broad term used to encompass the offences of slavery, servitude and forced or compulsory labour, and human trafficking. ¹
Forced Labour	This is “all work or service that is exacted from any person under the menace of a penalty and for which the said person has not offered themselves voluntarily”. ²
Human Trafficking	This is the act of recruitment, transportation, transfer, harbouring or receipt of persons, by the means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. ³

Policy Objectives

Every day, the travel and tourism sector is unwittingly used for human trafficking as traffickers transport their victims on planes, trains and buses. The suppliers used by the industry such as restaurants, shops and tourist attractions can also be used to perpetrate modern slavery by controlling and exploiting vulnerable individuals.

As a tour operator, we believe we have a role and responsibility to protect both the individuals we employ and those we encounter or rely upon during our travels. Inghams and Santa's Lapland staff, partners and customers are in the position to make a difference by doing all we can to prevent the occurrence of modern slavery.

¹ David Weissbrodt and Anti-Slavery International. 2002. Abolishing Slavery and its Contemporary Forms. OHCHR. <https://www.ohchr.org/sites/default/files/Documents/Publications/slaveryen.pdf>

² International Labour Organization Forced Labour Convention, 1930 (No. 29).

³ Crown Prosecution Service, <https://www.cps.gov.uk/prosecution-guidance/modern-slavery-and-human-trafficking-offences-and-defences-including-section>

This policy details how Inghams and Santa's Lapland work to identify and prevent incidences of all forms of modern slavery in line with the Modern Slavery Act 2015 Legislation.

Our objectives are simple:

1. Communicate to staff, leaders, suppliers and customers so they understand our stance and the importance of this policy
2. Help monitor the protection of people throughout our supply chains at home and overseas
3. Enable us to responsibly design and operate our holidays, both new and existing

Implementation Procedures

Inghams and Santa's Lapland understands there is risk for potential harm in all elements of our brands' vast and varied supply chains. We are focused on working with long-term partners who demonstrate the same commitment to ensuring modern slavery plays no part in their business or ours.

To ensure all Inghams and Santa's Lapland staff, local partners and suppliers, and tour leaders understand and recognise the signs of modern slavery, online training is provided alongside this policy to educate our team and supply chain on the subject.

Some countries are considered to have a higher risk of modern slavery and human rights abuses. We ask our brands to check the [Global Slavery Index](#) and the [Corruptions Perception Index](#) and identify the perceived risk of modern slavery occurring in the countries that our customers travel to.

We encourage customers and staff to report any instance of human exploitation and have a clear policy for reporting any suspected abuse, following the Three R principle in each brand: Recognise, Record, Report.

The responsibility for the implementation of this policy sits with the Managing Director and their General Management Team. They will oversee the auditing and training process, ensuring our policy remains robust, relevant and up-to-date and providing a single point of contact for all safeguarding concerns. Inghams and Santa's Lapland publish their own Modern Slavery statement on their website; and this statement can also be found on the government website.

Inghams and Santa's Lapland will:

Term	Definition
Recognise	Provide online training for staff, local partners and tour leaders on the warning signs of potential modern slavery
Record	An internal incident form will be kept updated, recording the details of exactly what was seen and what the concerns are
Report	All incidents will be reported to the relevant brand's Managing Director and safeguarding lead who will immediately report the suspected abuse, either via the Human Trafficking Hotline or the local authorities Inghams and Santa's Lapland also has a employee Whistleblowing policy that can be utilised

Any questions or concerns?

If you are concerned you may have witnessed an incident of modern slavery whilst on holiday with Inghams or Santa's Lapland, please get in touch: sustainability@hotelplan.co.uk

Monitoring and Improvement

This policy is intended as a tool to ensure Inghams and Santa's Lapland takes the necessary steps to eliminate incidents of modern slavery. Keeping modern slavery out of our supply chains is a process that requires regular attention. We will expect our approach to evolve as we continually review our processes, learn from others and strive for improvement.

Our Modern Slavery Policy was created in 2024 by the sustainability team and agreed by the General Management Team. The policy will be reviewed annually in line with our commitment to eliminating modern slavery across our entire business. Our policies set out the core principles for Inghams and Santa's Lapland. From this overarching framework, our tour operators bring tailored policies into their processes in the time and manner that best meets their specific needs and priorities.

Privacy statements

Inghams and Santa's Lapland takes your privacy extremely seriously and we are committed to doing everything we can to protect any personal information provided to us when enquiring about or booking a holiday or other travel service, visiting our websites or through other means. The following statements describes what, why and how we collect and use your personal information, how we protect it and how you can contact us.

[Inghams Privacy Policy](#)

[Santa's Lapland Privacy Policy](#)

Signed on behalf of



John Mansell

Managing Director

Inghams and Santa's Lapland

References

The following resources have been used to develop this Modern Slavery Policy:

[David Weissbrodt and Anti-Slavery International](#)

International Labour Organisation Forced Labour Convention (1930, No. 29)

[Crown Prosecution Service](#)

[AITO Modern Slavery Toolkit](#)

[Global Slavery Index](#)

[Corruption Perception Index](#)