

This statement on  
**Modern Slavery 2022/2023**  
is made pursuant to section 54(1)  
of the Modern Slavery Act 2015



## Introduction

Modern Slavery is a criminal activity, a gross violation of fundamental human rights and a growing concern. This Modern Slavery Statement (**Statement**) made on behalf of Imagine Cruising Limited and Imagine Transport Limited (**Imagine**) pursuant to Section 54(1) of the *Modern Slavery Act 2015* (**Act**). This Statement is made in relation to the financial year ending 31 March 2023. References to the terms 'we' and 'our' are used in this Statement to refer to Imagine.

Modern Slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services (**Modern Slavery**). Modern Slavery is a global issue, a criminal activity, a gross violation of fundamental human rights and a growing concern. Recognising that every area of business has the potential to be impacted by this issue, the Group<sup>1</sup> has implemented a policy for the prevention, detection, and reporting of Modern Slavery in all aspects of its business and supply chains. As a global organisation, the Group takes our moral and ethical obligation to combat Modern Slavery very seriously.

We are committed to preventing acts of Modern Slavery and human trafficking from occurring within its own business or in any of its supply chains and expects the same high standards from all its contractors, suppliers, and other business partners.

## Organizational Structure and Operations

We form part of the group consisting of Emirates, dnata, dnata World Travel and together with their subsidiaries (**the Emirates Group**) whose head office is in Dubai in the United Arab Emirates. The Emirates Group is an international organisation with business interests in aviation, air services, education, retail, travel, and hospitality, employing people from more than 160 countries across our business units and associated firms. You can learn more about the Emirates Group on our website.

Emirates is one of the world's largest international airlines, connecting millions of passengers each year across six continents. Operating a young and modern aircraft fleet, it is widely recognised for its high-quality innovative products and services.

dnata is one of the largest air service providers in the world offering ground handling, cargo, travel, catering and retail services in 34 countries across six continents. dnata is the ultimate parent company of Imagine companies.

Imagine creates cruise holidays for every type of traveller and every imagination. Imagine Cruising wants to take you beyond your cruising dreams. You can learn more about our business on our website: [About us \(imaginecruising.co.uk\)](https://www.imaginecruising.co.uk)

## Actions Taken to Combat Slavery Risks

Imagine are committed to monitoring for and avoiding Modern Slavery in its operation and has developed and implemented the policy, processes and actions discussed below.

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<sup>1</sup> Group means dnata, dnata world travel and Emirates, together with their subsidiaries.

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## Our Policies on Combatting Slavery

We are committed to acting ethically and with integrity in all our business relationships. We are proud to adhere to the Emirates Group policy on Anti-Slavery and Human Trafficking which advocates a zero-tolerance approach to Modern Slavery. A copy of the Group's policy on Anti-Slavery and Human Trafficking can be found at:

[Anti-Slavery and Human Trafficking Policy.pdf \(imaginecruising.co.uk\)](#)

Imagine expects our suppliers, subcontractors, and consultants to respect and adhere to our values and ethical standards of conduct.

## Due Diligence Processes for Combatting Slavery

We recognise that we cannot unilaterally solve the problem of Modern Slavery. However, to aid our efforts, we have processes in place to assess risk, undertake due diligence and effect remediation. Our due diligence processes are supported by our whistle-blower protection policy which encourages 'speaking out' against illegal and unsafe practices.

We are part of a group that is continuously evolving and improving. As part of this journey, practices and procedures will be adapted over time as their effectiveness is periodically reviewed. Our current due diligence practices consist of getting to know our suppliers through our supplier on boarding procedures, identifying suppliers where there is a known heightened risk of Modern Slavery and considering appropriate measures to mitigate the risk and take remedial action as deemed appropriate (including termination of suppliers).

## Further Steps to Prevent Modern Slavery

We are committed to continuous improvement to address the challenging and complex issue that is Modern Slavery.

Following our review of the effectiveness of the steps we have taken during FY22-23 to combat Modern Slavery in our business or supply chains, we intend to continue to build upon our existing policies and procedures to strengthen and reinforce our commitment to addressing these risks within our business.

Signed,



Robin Deller  
CEO