



Anti-Fraud, Bribery, and Corruption Policy Statement



Transition to
Net Zero



Our
People



Community
Connection



Governance
& Ethics

Anti-Fraud, Bribery, and Corruption Policy Statement

Our Commitment

Portman Travel Group (PTG) is committed to conducting business with honesty, integrity, and transparency. We maintain a zero-tolerance approach to fraud, bribery, and corruption in all forms and are dedicated to acting ethically, professionally, and lawfully in every aspect of our operations and business relationships.

This commitment applies across all PTG businesses, including Clarity, Destination Sport, Elegant Resorts, Evolvi, If Only, and all subsidiaries.

The Company recognises that industry practices may vary by country or by culture. What is considered unacceptable in one place may be normal or usual practice in another.

Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons always.

Zero Tolerance to Fraud, Bribery and Corruption

We prohibit all forms of:

- Fraud, including theft, deception, false claims, or financial misrepresentation.
- Bribery, including offering, promising, giving, requesting, or accepting anything of value to secure an improper business advantage.
- Corruption, including facilitation payments, kickbacks, abuse of position, and undisclosed conflicts of interest.

No employee, contractor, supplier, business partner, or representative acting on our behalf may engage in or facilitate such conduct.

Ethical Business Practices

We are committed to:

- Complying with all applicable laws and regulations in the jurisdictions where we operate.
- Review changes to relevant legislation and regulation and the impact on the Company
- Make sure that we have clear policies in place and these are communicated and access to all our people
- Maintaining effective controls to prevent, detect, and address fraud, bribery, and corruption.
- Conducting business fairly and responsibly.
- Providing training and guidance to our people on ethical conduct and compliance requirements.
- Maintain a Gift and Hospitality register and ensure that this is completed in line with the PTG Gift and Hospitality policy

- To ensure that no employee suffers detrimental treatment as a result of raising genuine concerns in relation to bribery or corruption
- Performing appropriate due diligence on third parties with whom we do business.

Gifts, Hospitality

PTG recognises that reasonable and proportionate gifts and hospitality can form part of legitimate business relationships. However, gifts, hospitality, or entertainment must never be offered, given, requested, or accepted where they could improperly influence a business decision or create a conflict of interest. All gifts and hospitality must be managed in accordance with our internal controls and approval processes.

Fair Competition and Conflicts of Interest

We support fair and open competition and comply with applicable competition laws. We do not tolerate anti-competitive practices such as price fixing, bid rigging, or market sharing arrangements.

We also require employees and representatives to avoid situations where personal, financial, or other interests could conflict with the interests of the business. Any actual or potential conflicts of interest must be disclosed and appropriately managed.

Speak Up and Reporting Concerns

We encourage employees, suppliers, customers, and other stakeholders to raise concerns about suspected fraud, bribery, corruption, unethical behaviour, or other wrongdoing. Reports made in good faith will be taken seriously, investigated appropriately, and handled as confidentially as possible.

Reports can be made through management channels or via Portman Travel Group's Whistleblowing arrangements.

Protection for Those Who Raise Concerns

PTG will not tolerate retaliation against anyone who raises a genuine concern in good faith or refuses to participate in fraudulent, corrupt, or bribery-related activities. Individuals who speak up responsibly will be supported and protected from detrimental treatment.

Accountability

Any breach of our anti-fraud, bribery, and corruption requirements may result in disciplinary action, termination of business relationships, and where appropriate, referral to regulatory or law enforcement authorities.

The Company will support anyone who raises genuine concerns regarding fraud, bribery or corruption in good faith even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment because of refusing to take part in fraud, bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential offence has taken place or may take place in the future.

Our Promise

Through strong governance, ethical leadership, and a culture of integrity, Portman Travel Group is committed to preventing fraud, bribery, and corruption and maintaining the trust of our customers, colleagues, suppliers, shareholders, and wider stakeholders.

Policy Statement

This policy statement and any associated documents are provided for general information only and do not constitute legal or other professional advice. They do not create contractual obligations or amend the terms of any agreement and should not be relied on as such. PTG may update this information from time to time and makes no representations or warranties (express or implied) that it is accurate, complete, or up to date. For further information, contact your relationship manager or GRC@portmantravelgroup.com. This statement is based primarily on UK/European requirements; additional local requirements may apply outside the UK/Europe.