Modern Slavery and Human Trafficking Statement

Our Business and Structure
ETrawler Unlimited Company ("ETrawler") (through our trading name CarTrawler) is a world leading B2B end-to-end travel technology solution provider. We build partnerships for travel businesses such as airlines, online travel agents and accommodation providers by connecting their customers with car rental, private transfer and other transportation solutions all over the world.

ETrawler also introduces customers directly to car rental and ground transportation solutions through our B2C brands (Argus Car Hire, Holiday Autos, Cabforce and Dęgrifauto).

Our company values, along with our focus on people and process, underpins how we create a successful global online marketplace bringing partners, customers and suppliers together and in turn, opportunities to life.

Our Supply Chains
ETrawler provides marketing and introductory services for providers of transportation-related products. ETrawler itself does not provide and is not responsible for the provision of such products, rather it facilitates the booking of those products by end customers.

ETrawler provides the majority of its services from our HQ in Dublin, Ireland. A small proportion of customer service calls are outsourced to our dedicated centre in Manila, Philippines. The Manila centre allows us to cater for a diverse multilingual customer experience across multiple time-zones. The centre is managed to the same high operational, ethical and reporting standards as our Dublin HQ with the Outourced Performance Manager and other senior Head Office team members onsite regularly throughout the year, resulting in a strong focus on consistency of operational performance. This level of oversight allows us to diligently monitor our operations for any potential risks to our workforce and in our supply chain.

ETrawler procures IT services, hardware and software, professional services and office supplies from reputable service providers.

The nature of ETrawler’s operations ensures that exposure to modern slavery is lower risk than for companies operating in other sectors but ETrawler is committed to staying vigilant and to doing its part to increase awareness of issues relating to modern slavery and human trafficking.

Our Approach
ETrawler has a zero-tolerance approach to modern slavery and unethical conduct in our business relationships. To facilitate this approach our Whistleblowing Policy is on our intranet homepage, has been distributed to all staff and forms a central part of our new staff induction process as we understand that a culture of openness and accountability is essential in order to prevent such activities occurring and going unsanctioned. Our standard supply contract includes a clause which binds transportation suppliers to be compliant with the UK Modern Slavery Act 2015 and all applicable anti-slavery legislation.
All staff are trained on an annual basis to be vigilant to the signs and dangers of modern slavery and encouraged where necessary to speak-up and utilise our designated Whistleblowing Officer within the company. All new staff are also required to read and acknowledge our Anti-Bribery and Corruption Policy which provides further context around the impact of unethical behavior on our company and the people we do business with.

Our Ongoing Mission
Over the coming year ETrawler intends to maintain and build on our focus on the identification and management of modern slavery risks within our business by further developing the measures mentioned above.

We aim to evolve as a company and will continue to review and assess our company policies in light of modern slavery.

This statement will be reviewed annually and updated as appropriate.

Signed for and on behalf of the board of directors of ETrawler Unlimited Company.

Cormac Barry
Chief Executive Officer
17 June 2019

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes CarTrawler's slavery and human trafficking statement for the financial year ending 30 September 2018.