

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



### **Introduction**

Modern slavery takes many forms, including forced labour, servitude, slavery and human trafficking and no industry sector or jurisdiction is immune.

Thomas Cook Group plc and its relevant group companies (Thomas Cook) are committed to ensuring that there is no modern slavery anywhere in our business, including in our supply chains. As we explain below, we are constantly developing and updating our procurement processes to help us ensure that we are satisfied with whom we deal and how they operate.

### **Our business and supply chains**

Thomas Cook is a leading leisure travel company operating across the world. We put our customers at the heart of everything we do and strive to provide them with trusted, personalised holiday experiences. Our employees work hard to make our customers' holiday dreams come true.

Thomas Cook is one of the largest global travel companies with approximately 2,957 retail outlets, 94 aircraft, 19m customers and employing 21,940 people. Thomas Cook's business is divided into four segments: United Kingdom; Continental Europe; Northern Europe; and Airlines Germany.

Thomas Cook's procurement functions oversee an extensive supply chain and are responsible for the selection and management of suppliers across the different parts of our business.

### **Our values and policies**

We are committed to working sustainably, responsibly and ethically and this is set out in our Code of Conduct for Thomas Cook employees, which provides guidance on how we expect our employees to behave and what to do if they suspect anyone is falling short of these behaviours. This includes acting with integrity at all times in our business dealings.

We expect the same high standards of behaviour from our suppliers as we do from ourselves. We therefore have a Supplier Code of Ethics and Conduct, which sets out the standards of behaviour expected of our suppliers throughout our business relationship (as further described below). We run a formal selection process for many of our major suppliers and Thomas Cook will only work with the supplier if the supplier meets the standards we expect.

### **The steps we have recently taken to prevent modern slavery within our business and supply chains**

We consider preventing modern slavery and human trafficking as one of our highest sustainability priorities.

Thomas Cook regularly reviews its supplier selection and management processes and procedures and conducted such a review in light of the Modern Slavery Act 2015. As part of this work, Thomas Cook has this year adopted a new Supplier Code of Ethics and Conduct, taking account of the Modern Slavery Act 2015 and aimed specifically at the ethical standards and behaviours we require of our

suppliers. We have also included compliance with our Supplier Code of Ethics and Conduct as a contractual term in commercial agreements.

The Supplier Code of Ethics and Conduct includes the following minimum standards that we expect from suppliers:

- support and respect the protection of internationally recognised human rights;
- treat all employees with dignity and respect and not use any threats of violence, sexual exploitation, abuse, or verbal or psychological harassment;
- ensure that no work or service for Thomas Cook has been provided through force, threat or coercion;
- ensure that their workplace and environment does not endanger the physical integrity or health of employees; and
- observe the law and any relevant binding codes of practice in all countries in which they operate.

Thomas Cook continues to work with Travelife for our hotels and resorts. Travelife is an independent sustainability audit programme for tourism businesses. We strongly encourage and support our hotels to achieve the Travelife Gold standard, which demonstrates compliance with leading international standards in areas including labour practices and human rights.

We shall continue our work next year and beyond to ensure that there is no modern slavery or human trafficking in our business or our supply chains.

### **Training**

Our employees are aware of our Code of Conduct and the high standards expected by Thomas Cook. We are committed to training our employees so that they fully understand the behaviour required of them, stay alert to the issues and can spot where acts of modern slavery could occur. We will continue to develop our training for our employees across the business.

### **Raising concerns**


We believe that we all have a responsibility to be aware of the risk of modern slavery and human trafficking in our business and supply chains and our employees play an important role in ensuring this by recognising modern slavery red flags and elevating their concerns so that further investigation and any required remedial action can be taken quickly. In our Code of Conduct, we encourage employees to speak out if they have any concerns.

In the last financial year, we have updated our whistleblowing policy for employees, which sets out how they can report any concerns either with their managers or confidentially via an independent reporting service.

We encourage our suppliers and contractors to be vigilant and raise any concerns they have about unethical conduct. This year we also have put in place a similar whistleblowing policy for suppliers, which sets out how they can report concerns either to a Thomas Cook employee or confidentially via an independent reporting service.

## Modern Slavery Act 2015

The UK Modern Slavery Act 2015 requires certain commercial organisations to publish an annual transparency statement disclosing the steps taken to ensure that modern slavery and human trafficking do not exist in their business or supply chains. This statement has been published pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Thomas Cook has taken during the financial year ended 30 September 2016 to prevent modern slavery and human trafficking in our business and supply chains.

Signed: 

Peter Fankhauser, Chief Executive Officer

for and on behalf of Thomas Cook Group plc

Date: 28 November 2016