



INTRODUCTION

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 or supply chains. These group companies are noted at the back of this statement.

This is our 2018 Modern Slavery and Human Trafficking Statement. In this year's statement, we provide an update on our progress and set out the further steps that Thomas Cook has taken during the financial year ended 30 September 2018 to prevent modern slavery and human trafficking in our business.

OUR BUSINESS

Thomas Cook is a leading leisure travel company operating across the world with approximately 2,800 retail outlets, 100 aircraft, 22 million customers and employing 20,800 people. Our business consists of a Tour Operator and an Airline, and our source markets are mainly based in the United Kingdom, Continental Europe, and Northern Europe. We put our customers at the heart of everything we do and strive to provide them with trusted, personalised holiday experiences.

OUR VALUES AND POLICIES

Our internal Code of Conduct provides guidance on our company values. This includes a section on "Supplier Relationships", which emphasises the importance of acting with integrity at all times in our business dealings. This includes working with suppliers who score highly on sustainability and human rights compliance.

The supplier relationships section also explains the Thomas Cook approach to purchasing, including an assessment of a supplier's approach to combatting modern slavery and ensuring that suppliers comply with Thomas Cook policies on ethical business behaviour (for example, our Supplier Code of Ethics and Conduct and our Supplier Speaking Out policy).

Employees review the Code of Conduct through an annual training programme (see below) and new joiners are also trained and assessed on their understanding of the code through the induction process.

HUMAN RIGHTS DUE DILIGENCE REVIEW

In 2018 we commissioned modern slavery and human rights experts Stronger Together to conduct an external human rights due diligence review of our business. This review was designed to assess Thomas Cook's approach to human rights to date, advise on the development of the business strategy, and make any recommendations on where improvements might be made to enhance the robustness of our approach.

The review focused on the following topics:

- Modern slavery, forced labour and debt bondage, exploitation and human trafficking;

- Commercial sexual exploitation and sexual abuse;
- Child labour; and
- Child protection.

Stronger Together's consultants used the United Nations Guiding Principles on Business and Human Rights (UNGPs) to develop a systematic methodology to review Thomas Cook's human rights work. Their review included:

1. Desk research: a systematic review of documents provided by Thomas Cook including internal and external policies, annual reports, e-learning content, training documents and flow charts;
2. Stakeholder interviews: interviews with Thomas Cook representatives from across its business and key external partners; and
3. Destination level research: a destination visit to a Thomas Cook owned and franchised hotel, where the consultants interviewed stakeholders in destination. There were face to face interviews using pre-determined questionnaires, contributing to a better understanding of how Thomas Cook's human rights policies and procedures are implemented across destinations and supply chains.

The interim report included recommendations such as aligning our policies across the Group, better tracking of the implementation of our policies and expanding our training programmes.

In 2019 we will receive a final report from Stronger Together which will set out recommendations to further mitigate the risk of modern slavery within our supply chain. We will then undertake activities to meet these recommendations and will report our progress in our statement for the next financial year.

TRAVELIFE: ENSURING COMPLIANCE

Travelife is an internationally recognised sustainability certification programme for hotels and accommodation providers. The scheme's management system enables hotels to address key areas of sustainability such as resource efficiency and waste management in a cost effective way alongside other pertinent supply chain management issues such as child protection and labour conditions.

Travelife provides greater oversight of the supply chain of hoteliers. All Travelife certified hotels and accommodation must undertake an independent on-site audit to prove they meet strict criteria before they receive a Travelife Award, which certifies that the hotel is compliant with local employment legislation and takes suitable steps to ensure that there is no modern slavery in its purchasing processes.

As part of their human rights due diligence review noted above, Stronger Together reviewed processes, and interviewed key staff, from Travelife. This review included documents such as its standards for hotels, a checklist on the standards and key guidance provided to hotels, factsheets on relevant issues and templates for training.

Overall the Travelife standards and procedures were found to be robust, and Stronger Together recommend that we continue with this partnership and our targets of ensuring all own brand hotels are Travelife certified.

In the last year we have further integrated the Travelife standard into our business, making the standard included as mandatory for all of our own hotel brands from the beginning of 2019. We have committed that by 2020, 100% of our own brand hotels will have a Travelife Award.

TRAINING

We continue to conduct a range of training across our business to identify and manage modern slavery risk. Groups recently trained include in-destination staff and cabin crew in our airline, who receive training designed in line with UK Border Force guidance.

In 2018 we rolled out a new compulsory e-Learning training on our internal Code of Conduct noted above. This training includes clear guidance on eliminating and reporting occurrences of modern slavery and human rights issues.

Thomas Cook plans to expand training on human rights and modern slavery in 2019, aligned to the recommendations contained in the human rights due diligence review by Stronger Together noted above.

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. Our Speaking Out policy sets out how employees can report any concerns either to their managers or confidentially via an independent reporting service online or by telephone.

Information about our Speaking Out policy continues to form part of the induction process for new joiners across Thomas Cook. For our existing employees, the Speaking Out policy and the independent reporting service are promoted by our Group Security department together with Group HR, supported by our Group Executive Committee.

In 2019 we plan to further increase the visibility of the Speaking Out policy across our business, both in our corporate locations and in destinations.

MODERN SLAVERY ACT 2015

Thomas Cook are publishing this statement pursuant to Section 54 of the Modern Slavery Act 2015.

Signed:



Peter Fankhauser, Chief Executive Officer
for and on behalf of Thomas Cook Group plc

Date: 27 November 2018

The relevant Thomas Cook group companies:

Thomas Cook Tour Operations Limited, England

TCCT Retail Limited, England

Thomas Cook Airlines Limited, England

Thomas Cook Aircraft Engineering Limited, England

Thomas Cook Retail Limited, England

Condor Flugdienst GmbH, Germany

Thomas Cook Airlines Scandinavia A/S, Denmark

OY Tjaereborg AB, Finland

Ving Norge A/S, Norway

Ving Sverige AB, Sweden

Spies A/S, Denmark

Bucher Reisen & Öger Tours GmbH, Germany

Neckermann Polska BP SP. z.o.o, Poland

Thomas Cook Austria AG, Austria

Thomas Cook International AG, Switzerland

Thomas Cook Touristik GmbH, Germany

Thomas Cook GmbH, Germany

Thomas Cook Belgium NV, Belgium

N-U-R Neckermann-utazás Szolgáltató Kft, Hungary

Thomas Cook Nederland BV, Netherlands

Thomas Cook Retail NV, Belgium

Thomas Cook SAS, France