

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



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.

Last year, we published our first Modern Slavery and Human Trafficking Statement, which included the steps we had taken in relation to our Supplier Code of Ethics and Conduct and our Speaking Out policy.

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 2017 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 2,832 retail outlets, 93 aircraft, 20.1m customers and employing 21,599 people. We put our customers at the heart of everything we do and strive to provide them with trusted, personalised holiday experiences.

OUR SUPPLY CHAINS AND PROCUREMENT PROCESSES

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.

In the last year we have implemented and made mandatory the use of one common online tender tool across our UK&I operations and Group supplier categories. The tool provides a standard approach and incorporates Thomas Cook policies and requirements, including in relation to modern slavery.

Significantly, this means that suppliers taken forward in the tender process have signed up to our Supplier Code of Ethics and Conduct and that they have provided copies of their own internal policies for Thomas Cook to review. Suppliers who do not provide the correct assurances are required to complete further detailed questionnaires, including questions regarding the supplier's audit process and how a supplier manages the different stages of its own supply chain.

We intend to implement this measure across the rest of the Thomas Cook business in the next financial year.

We have developed a risk matrix for use when on-boarding new suppliers. This provides a preliminary modern slavery risk assessment based on relevant factors including country of location and goods/services being purchased.

For our existing suppliers, we completed a UK pilot to measure suppliers against this risk matrix. The results indicated that the modern slavery risk was low. We intend to complete a similar assessment against the existing supplier database for other markets in the next financial year, and to the extent we identify risks we will develop mitigation strategies.

TRAVELIFE: ENSURING COMPLIANCE

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

Travelife also provides greater oversight of the supply chain of hoteliers. All Travelife certified hotels and accommodations must undertake an independent on-site audit to prove they meet strict criteria before they receive a Travelife Award. Hotels which are members of the scheme are compliant with local employment legislation and take suitable steps to ensure that there is no modern slavery in their purchasing processes.

In the last year we have integrated the Travelife standard as mandatory for our Sentido, Sunwing, Sunprime and Casa Cook hotels. Our next steps will be integration for our Smartline and SunConnect hotels in 2018 and 2019. We have committed that by 2020, 100% of our own brand hotels will have a Travelife Award.

OUR VALUES AND POLICIES

Since our last statement, we have introduced a new internal Code of Conduct which provides updated 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, such as working with suppliers who score highly on sustainability and human rights compliance.

This 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).

Training on the new Code of Conduct is being rolled out for existing employees and is also completed by new joiners to Thomas Cook as part of their induction process.

TRAINING

The Code of Conduct explains to employees 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. Additional training this year has included:

In-destination services (IDS) and destination teams

A Modern Slavery Factsheet has been developed for IDS employees and destination teams. The factsheet provides examples of modern slavery, explains what people should look out for and gives details of how to raise a concern.

Airlines Cabin Crew

Airlines cabin crew are required to complete an e-learning course on human trafficking, which has been produced in line with UK Border Agency (UKBA) guidance.

The course explains what trafficking is and identifies general indicators to help crew recognise potential trafficking situations. The course also provides guidance on how to raise concerns internally via the Thomas Cook reporting system and also explains how to refer concerns to UKBA.

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.

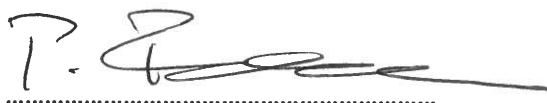
Information about our Speaking Out policy forms part of the induction process for new joiners across Thomas Cook. For our existing employees, the Speaking Out policy and the independent reporting service are actively promoted by our Group Security department.

The Group Security team delivered a training session on the Speaking Out policy at the IDS Destination Managers meeting and has been promoting the independent reporting service and advice and publicity materials at office locations.

MODERN SLAVERY ACT 2015

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

Signed:



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

Date: 20 November 2017