



Supplier Code of Ethics and Conduct

Policy Summary

Policy Summary: This Supplier Code of Ethics and Conduct (“Code”) sets out the minimum standards of business behaviour expected of Suppliers, who must have processes in place to monitor and maintain these standards, including within their own supply chains.

Policy Scope: This is a Group-wide policy which applies to everyone across the Group, in whichever jurisdiction they are located including: all employees, managers and directors; all temporary workers including consultants, agency workers, employees on secondment and such other persons doing work for us; and all third parties associated, and doing business, with us including agents, suppliers, advisors and other business partners and their employees.

This policy is non-contractual and does not form part of employees’ terms and conditions of employment, and may be amended at any time.

Contents

1. Overview	3
2. Our People	3
2.1 Human Rights	3
2.2 Child Labour	3
2.3 Child Protection from sexual abuse	3
2.4 Forced Labour	3
2.5 Wage and Benefits	4
2.6 Fair Treatment and Equal Opportunity	4
2.7 Freedom of Association	4
2.8 Health and Safety	4
3. Our Business	4
3.1 Anti-Bribery and Corruption	4
3.2 Gifts and Hospitality	5
3.3 Conflict of Interest	5
3.4 Legal	5
3.5 Breach of confidentiality	5
3.6 Honesty	5
3.7 Business Behaviour	5
3.8 Identification	5
3.9 Responsibility	5
3.10 Whistleblowing	6
4. Our Environment And The Community	6

Policy

1. Overview

Thomas Cook Group plc. and its affiliated entities (“TC” or “We”) are committed to operating a sustainable and ethical business that customers can trust to deliver on its promises and protect their interests. For this reason we only choose suppliers, consultants, business partners, agents or persons of equal relationship (“Suppliers”) that fully comply with industry best practices and relevant legislation, including the UK Modern Slavery Act 2015.

This Supplier Code of Ethics and Conduct (“Code”) sets out the minimum standards of business behaviour expected of Suppliers, who must have processes in place to monitor and maintain these standards, including within their own supply chains. TC has the right to audit Suppliers to ensure compliance with this Code.

2. Our People

2.1 Human Rights

TC fully supports the protection of human rights around the world and will not do business with any individual, company or organisation that violates the standards and principles of basic human rights, or has links with an oppressive regime which gives cause for concern.

Suppliers must support and respect the protection of internationally recognised human rights. In particular, Suppliers must treat all employees with dignity and respect and must not use any threats of violence, sexual exploitation, abuse, or verbal or psychological harassment. No harsh or inhumane treatment, coercion, or corporal punishment of any kind will be tolerated, or threats of any such treatment.

2.2 Child Labour

Suppliers must comply with child protection laws, including the United Nations Convention on the Rights of the Child and the International Labour Organization Convention Numbers 138 and 182. Suppliers must also comply with local laws regarding the minimum age of employees and all legal requirements for the work of authorised young workers, particularly those relating to hours of work, wages and safe working conditions.

2.3 Child Protection from sexual abuse

We condemn all forms of sexual exploitation of children and Suppliers must comply with all laws to prevent and punish these offences.

2.4 Forced Labour

TC does not use any work product or service that has been provided through force, threat or coercion. People must be free to end their employment in line with established laws, regulations, and rules.

2.5 Wage and Benefits

Suppliers must pay all employees a fair wage in line with normal industry conditions or the applicable legal minimum wage and ensure that applicable legal restrictions on working hours are complied with.

2.6 Fair Treatment and Equal Opportunity

Suppliers must ensure equality of opportunity and treatment in regards to employment and occupation. Fair treatment and equal opportunity must be without discrimination on the grounds of race, colour, sex, religion, political opinion, national ancestry, social origin or any other grounds for discrimination.

2.7 Freedom of Association

TC values open communication between employees and management without intimidation or fear, reprisal, harassment or penalty, and expects the same from Suppliers.

Suppliers must recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing. TC recognises and respects employees' right to collective bargaining.

2.8 Health and Safety

Suppliers must ensure that their workplace and environment does not endanger the physical integrity or health of employees. Suppliers must be committed to take action to reduce the causes of accidents and improve working conditions. Employees must be provided with drinking water, clean toilets in sufficient numbers, adequate ventilation, emergency exits, and proper lighting.

3. Our Business

3.1 Anti-Bribery and Corruption

Suppliers must:

- Comply with all applicable laws, statutes, regulations and codes relating to anti-bribery and anti-corruption, including but not limited to, the UK Bribery Act 2010 and the United Nations Convention Against Corruption 2003, and not engage in any form of bribery or corruption in any aspect of its business or external relationships;
- Adhere to the highest standards of moral and ethical conduct, respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery;
- Comply with this Code and ensure all of the Suppliers' personnel working with TC comply with this Code; and
- Promptly report to TC any request or demand for any undue financial or other advantage of any kind received in connection with the performance of any services for TC.

3.2 Gifts and Hospitality

TC does not accept any type of gift or hospitality that is inappropriate. Suppliers must not offer any inappropriate benefit or opportunity to a TC employee in order to facilitate business with TC.

3.3 Conflict of Interest

Suppliers must disclose to TC any situation that may appear as a conflict of interest, and if any TC employee has an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.

Unless appropriate consent is provided, Suppliers should not accept work with TC if it conflicts with any of their other existing clients, and work from future clients should not be accepted if it conflicts with the interests of TC.

3.4 Legal

Suppliers must observe the law and any relevant codes of practice in all countries they operate. Suppliers must not behave in a way which could discredit TC or cause TC to be involved or associated directly or indirectly with illegal or dubious practices.

3.5 Breach of confidentiality

Suppliers must not disclose any TC confidential information to a third party without prior consent from TC (including any statements to the press or other media about TC or the work which the Supplier undertakes for TC).

3.6 Honesty

TC values honesty and Suppliers must never knowingly make any false, misleading or inaccurate statements, suppress or destroy any fact observed in any report to TC, and always report any findings immediately so that prompt and responsible action can be taken by TC.

3.7 Business Behaviour

Suppliers must render full and proper accounts for all work authorised and never to ask for, or receive, payments in cash or kind.

3.8 Identification

If attending any of TC's locations, all employees (and the employees of any sub-contractors) must carry official identification which must be produced on request by any TC employee or agent. Where identification cannot be produced the individual may be refused access or asked to leave.

3.9 Responsibility

TC has the right to audit how Suppliers fulfil the Code and / or corresponding legal requirements. For any identified non-compliance with the Code or law, the Supplier must provide a corrective action plan to be approved by TC. TC reserves the right, if the non-

compliance is unlawful, to end any contract with the Supplier, without any financial or other liability being incurred by TC as a result of such termination.

3.10 Whistleblowing

Suppliers must make the TC **Supplier Speaking Out Policy**, available to all their employees and contractors who provide services to TC or who are in contact with TC employees on a regular basis. Supplier employees and/or contractors may report any legitimate concerns that they may have, which relate directly to the TC Group Supplier Speaking Out Policy, regarding TC and/or its employees to: <https://wrs.expolink.co.uk/thomascook> . The policy may be amended from time to time.

4. Our Environment And The Community

We expect Suppliers to take all reasonable steps to reduce the impact of their operations and of the products they produce on the environment. Suppliers should consider and reduce their use of raw materials as well as reducing consumption of energy and water. Suppliers should also help to encourage social and economic development in the community they operate in, investing in the development of staff and the local supply chain.