

Modern Slavery and Human Trafficking Statement for Hotelbeds Group (“Hotelbeds”)
Statement for Financial Year 2017/2018

This statement is made pursuant to s.54 of the United Kingdom Modern Slavery Act 2015 (“**Modern Slavery Act**”).

Hotelbeds is committed to ethical working practices and maintaining integrity and transparency in all dealings with employees, clients, business partners and suppliers.

Hotelbeds understands that slavery can occur in several forms, including forced labour, workplace abuse, domestic servitude, child labour and human trafficking (“**Modern Slavery**”). We are committed to putting in place effective controls to safeguard against any form of Modern Slavery occurring within our business or supply chain.

Our organisation

Hotelbeds, whose headquarters is in Palma de Mallorca, is a service provider to the global travel trade. We distribute accommodation, transfers, tours and activities in more than 185 countries. The group is active in more than 120 source markets worldwide and with local destination management operations in more than 40 countries. The business comprises two business units: Bedbank and Destination Management.

Our policies

Hotelbeds operates a number of internal policies and practices to help ensure that we are conducting business in an ethical and transparent manner, including:

- **Hotelbeds Group Code of Conduct**. The Code of Conduct sets the framework around how HBG employees work together to deliver products and services globally. It gives clarity to employees and everyone HBG deals with about how the company does business. It sets out what HBG stands for. <http://group.hotelbeds.com/policy/hotelbeds-group-code-of-conduct.pdf>
- **Corporate Sustainability Policy**. This policy reflects Hotelbeds’ commitment to sustainable best practices in all aspects of the business, with a particular focus on employees, company culture, the environment and local communities. <http://group.hotelbeds.com/policy/hotelbeds-group-corporate-sustainability-policy-external.pdf>
- **Child Protection Policy**. This policy defines Hotelbeds’ commitment to child protection by setting out the actions and practices taken in order to contribute to the eradication of the Commercial Sexual Exploitation of Children and Adolescents. <http://group.hotelbeds.com/policy/hotelbeds-group-child-protection-policy-external.pdf>
- **Animal Welfare Policy**. This policy has been created to promote responsible practices among our suppliers to ensure best animal treatment practices, compliance with relevant national and international legislation and to meet clients’ expectations. <http://group.hotelbeds.com/policy/hotelbeds-group-animal-welfare-policy.pdf>

- **Supplier Code of Conduct.** This code sets out the minimum standard of ethical conduct, values and principles Hotelbeds expects from suppliers, contractors and agents. <http://group.hotelbeds.com/policy/hotelbeds-group-supplier-code-of-conduct>

Our suppliers and third parties

Hotelbeds requires its suppliers to comply with the national, supranational and international legislation and related procedures, restrictions and sanctions in relation to human rights and labour law; supporting local communities, identifying and monitoring bribery and corruption risks, identifying and monitoring negative environmental impacts; and introducing/maintaining quality assurance and Health and Safety policies in their business.

As part of our contract with suppliers, we require that they acknowledge and comply with the Modern Slavery Act, and at our request, provide us with any information or reasonable assistance to enable us to identify their supply chain. We reserve our right to terminate a supplier's contract in the event that any instances of Modern Slavery are discovered.

The HBG Supplier Code of Conduct requires that Suppliers:

1. Adhere to International Labour Organisation by treating workers with respect and ensuring that relevant information on employee rights is easily accessible;
2. Will not employ anyone against their will, traffic, use forced, bonded, compulsory or prison labour;
3. Must ensure no slavery or human trafficking operates in their business or supply chain;
4. Must ensure that employees have the correct visa and working documentation in place, and ensure that written contracts for direct and contract workers exist.

Training

Hotelbeds Group provides training, guidance and support wherever needed. During the last fiscal year, we have conducted Modern Slavery training in a number of countries including the Dominican Republic, Mexico, China, India and Thailand to enable staff in key roles to identify and address potential Modern Slavery risks. This allows staff to be aware of what to do if they suspect that Modern Slavery is taking place within a supply chain, or within their business.

Monitoring

We adopt a continuous improvement approach to our performance in this area, and will use several performance indicators to judge whether our policies and the steps that we are taking to try and eliminate Modern Slavery within our business or supply chain have been effective.

In the coming year, as a business we aim to continue reviewing, developing and promoting our policies and practices to identify and mitigate risk areas for modern slavery and human trafficking in our business

and supply chains. We aim to circulate updated Modern Slavery awareness information and continue conducting training to our staff in order to refresh and update the business and our supply chains on the current policy and legislation.

Approval for this statement

This statement was approved by the Board of Directors on 05 February 2018

Joan Vilà

Managing Director Hotelbeds Group

