

Modern Slavery and Human Trafficking Statement for Hotelbeds Group (“Hotelbeds”)
Statement for Financial Year 2016/2017

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 to the travel trade, corporate clients and government agencies. The business comprises four business units: Bedbank, Transfer & Activity Bank, Destination Management and New Ventures.

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>
- **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.pdf>

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. We started to conduct Modern Slavery training to enable staff in key roles to identify and address potential Modern Slavery risks.

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.

Approval for this statement

This statement was approved by the Board of Directors on 13 March 2017



Joan Vilà

Managing Director Hotelbeds Group