



MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 October 2017.

Hays Travel Limited and its relevant group companies (Hays Travel) are committed to ensuring that there is no modern slavery and human trafficking in any part of our business, including in our supplier chains. Group companies include Hays Tour Operating Limited.

Organisation's structure

Hays Travel is the largest independent travel agent in the UK which was founded in 1980 and started to operate also as tour operator in 2012. The annual gross sales in the last financial year were £943m. The Group has over 1,200 employees who operate within the UK.

The retail network consists of more than 398 high street travel agencies covering most of the UK. 178 shops are concentrated in the North and South West of England and operate under the Hays Travel brand, the remaining 220 shops are scattered all over the UK and operate under different Independence Group members' brands.

More than 100 legal entities form our Independence Group (IG) who sell our products as either agents of the tour operating business or as sub agents of Hays Travel Limited. Our Group provides them with the licenses (ATOL, ABTA and IATA), the back office support and the technology needed to sell our products.

In addition to our retail presence we also sell through both our own call centres, contact centre and a network of independent consultants.

The main travel products we sell are as follows:

- Packages, either from our tour operation or from other tour operators
- Non-package products (mainly cruise, hotel, transfers & car hire combinations)
- Foreign Currency
- Travel Insurance

Our supply chains

Our commercial department is responsible for the selection and management of all our holiday travel suppliers. They oversee an extensive supply chain of suppliers, including but not limited to airlines, packages providers, transfers, car hire and accommodation suppliers, agents, subagents, both in the UK and abroad.

Our procurement department oversees our indirect services suppliers (professional services, facilities, sales and marketing agencies and uniforms manufacturers).

We conduct checks to determine their financial stability and where appropriate we carry out supplier audits.

Our values and our policy on slavery and human trafficking

Hays Travel is committed to ensuring that there is no modern slavery or human trafficking in our supply chains and in any part of our business.

The Code of Conduct for Hays Travel employees defines our commitment to working responsibly and ethically and provides guidance on how we expect our employees to behave and what steps to take if they suspect anyone is not complying with the Code.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy also encourages the reporting of concerns and the protection of whistle blowers in line with our Hays Travel's whistleblowing policy.

We have communicated to suppliers, contractors and business partners our zero-tolerance approach to modern slavery in our business and supply chains. We have included in our contracts specific clauses, firstly, to guarantee that our suppliers comply with all applicable anti-slavery and human trafficking laws and regulations including but not limited to the Modern Slavery Act 2015 and secondly to ensure that there is no slavery or human trafficking in their supply chains, by implementing due diligences to their own subcontractors.

We have provided training to our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and to make sure they fully understand the behaviour required by them.

Where appropriate we have included reference to the Modern Slavery Act 2015 in our policies and procedures, in particular in our whistleblowing policy for employees and in our Code of Conduct.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

- Implement a Supplier Code of Ethics and Conduct to define minimum standards that we expect from suppliers.
- Include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, as part of our contracting processes. We will ask our suppliers to hold their own suppliers to the same high standards.
- Ask all new suppliers to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain.
- We will require our business partners to provide training to their staff and suppliers and providers on this field.



John Hays
Managing Director

14 November 2018