

OVERVIEW

2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

6. OUR STAFF 7. ANTI-BRIBERY AND CORRUPTION

## 1 **OVERVIEW**

121 Classic package holidays. 5 122 Dynamic packaging. 5 123 Cruise. 5 124 Stakeholders and partnerships 5 125 Management of sustainability 6 2. Our Vision for Sustainable Tourism. 7 3. Policies and guidelines 8 3.1 Thomas Cook Group Code of Conduct. 8 3.2 Thomas Cook Group Supplier Code of Ethics and Conduct. 8 3.3 Thomas Cook Group Child Protection policy. 8 3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children. 8 3.5 Thomas Cook Northern Europe charitable giving policy. 9 3.6 Thomas Cook Airlines Scandinavia Environmental policy. 9 3.7 External auditing. 9 3.71 Travelife. 9 3.72 EU Ecolabel. 9 3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9 4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11 5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13	1. Overview	2
1.2 Our business	1.1 About this report	3
122 Dynamic packaging	1.2 Our business	4
12.3 Cruise	1.2.1 Classic package holidays	5
1.24 Stakeholders and partnerships	1.2.2 Dynamic packaging	5
2. Our Vision for Sustainabile Tourism. 7  3. Policies and guidelines. 8 3.1 Thomas Cook Group Code of Conduct. 8 3.2 Thomas Cook Group Supplier Code of Ethics and Conduct. 8 3.3 Thomas Cook Group Child Protection policy. 8 3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children. 8 3.5 Thomas Cook Northern Europe charitable giving policy. 9 3.6 Thomas Cook Airlines Scandinavia Environmental policy. 9 3.7 External auditing. 9 3.71 Travelife. 9 3.72 EU Ecolabel. 9 3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9 4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11 5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13	1.2.3 Cruise	5
2. Our Vision for Sustainable Tourism	1.2.4 Stakeholders and partnerships	5
3. Policies and guidelines.  3.1 Thomas Cook Group Code of Conduct.  8. 3.2 Thomas Cook Group Supplier Code of Ethics and Conduct.  8. 3.3 Thomas Cook Group Child Protection policy.  8. 3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children.  8. 3.5 Thomas Cook Northern Europe charitable giving policy.  9. 3.6 Thomas Cook Airlines Scandinavia Environmental policy.  9. 3.7 External auditing.  9. 3.7 External auditing.  9. 3.7 Fixelife.  9. 3.7 Eu Ecolabel.  9. 3.7 Stonger Together.  9. 4. Environmental sustainability.  10. 4.1 CO2 emissions.  10. 4.2 Travelife.  11. 5. Social Responsibility and human rights.  5.1 Supporting and engaging in local communities.  13. 6. Our staff.	1.2.5 Management of sustainability	6
3.1 Thomas Cook Group Code of Conduct. 8 3.2 Thomas Cook Group Supplier Code of Ethics and Conduct. 8 3.3 Thomas Cook Group Child Protection policy. 8 3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children. 8 3.5 Thomas Cook Northern Europe charitable giving policy. 9 3.6 Thomas Cook Airlines Scandinavia Environmental policy. 9 3.7 External auditing. 9 3.71 Travelife. 9 3.72 EU Ecolabel. 9 3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9 4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11 5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13	2. Our Vision for Sustainable Tourism	7
3.2 Thomas Cook Group Supplier Code of Ethics and Conduct. 8 3.3 Thomas Cook Group Child Protection policy. 8 3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children. 8 3.5 Thomas Cook Northern Europe charitable giving policy. 9 3.6 Thomas Cook Airlines Scandinavia Environmental policy. 9 3.7 External auditing. 9 3.71 Travelife. 9 3.72 EU Ecolabel. 9 3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9 4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11 5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13	•	
3.3 Thomas Cook Group Child Protection policy	3.1 Thomas Cook Group Code of Conduct	8
3.4 Thomas Cook Northern Europe Policy against commercial sexual exploitation of children	3.2 Thomas Cook Group Supplier Code of Ethics and Conduct	8
3.5 Thomas Cook Northern Europe charitable giving policy		
3.6 Thomas Cook Airlines Scandinavia Environmental policy		
3.7 External auditing.       9         3.7.1 Travelife.       9         3.7.2 EU Ecolabel.       9         3.7.3 ISO 14001 Certification.       9         3.7.4 Stronger Together.       9         4. Environmental sustainability.       10         4.1 C02 emissions.       10         4.2 Travelife.       11         5. Social Responsibility and human rights.       13         5.1 Supporting and engaging in local communities.       13         6. Our staff.       14		
3.7.1 Travelife.       9         3.7.2 EU Ecolabel.       9         3.7.3 ISO 14001 Certification.       9         3.7.4 Stronger Together.       9         4. Environmental sustainability.       10         4.1 C02 emissions.       10         4.2 Travelife.       11         5. Social Responsibility and human rights.       13         5.1 Supporting and engaging in local communities.       13         6. Our staff.       14	· · ·	
3.72 EU Ecolabel. 9 3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9  4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11  5. Social Responsibility and human rights 13 5.1 Supporting and engaging in local communities. 13 6. Our staff. 14	· · · · · · · · · · · · · · · · · · ·	
3.73 ISO 14001 Certification. 9 3.74 Stronger Together. 9  4. Environmental sustainability. 10 4.1 C02 emissions. 10 4.2 Travelife. 11  5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13 6. Our staff. 14		
4. Environmental sustainability. 10 4.1 CO2 emissions. 10 4.2 Travelife. 11 5. Social Responsibility and human rights. 13 5.1 Supporting and engaging in local communities. 13 6. Our staff. 14		
4. Environmental sustainability		
4.1 CO2 emissions	3.7.4 Stronger Together	9
4.2 Travelife	4. Environmental sustainability	10
5. Social Responsibility and human rights	4.1 CO2 emissions	10
5.1 Supporting and engaging in local communities	4.2 Travelife	]]
6. Our staff	5. Social Responsibility and human rights	13
	5.1 Supporting and engaging in local communities.	13
7 Anti-hribery and corruntion	6. Our staff	14
And bribery and corruption	7. Anti-bribery and corruption	15
7.1 Code of Conduct and Policies	7.1 Code of Conduct and Policies.	15



2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY SUSTAINABLE TOURISM AND GUIDELINES SUSTAINABILITY AND HUMAN RIGHTS 6. OUR STAFF 7. ANTI-BRIBERY AND CORRUPTION

#### 1.1 ABOUT THIS REPORT

Thomas Cook Nordic Holdings AB, part of Thomas Cook Group, has been working with sustainability for many years through our leisure travel companies, brands and airline company Thomas Cook Airlines Scandinavia A/S.

We see it as our responsibility to promote sustainable tourism, where we contribute to positive economic and social development while minimizing environmental impact at home and abroad. We're embedding sustainable practices in all parts of our business and engaging our colleagues, customers, suppliers and other stakeholders in our endeavors.

The report gives a comprehensive assessment of our sustainability strategy and approach, as well as an overview of our performance. The report covers Thomas Cook Nordic Holdings AB including affiliated companies:

CountryCompany NameSwedenVing Sverige ABDenmarkSpies A/SFinlandOy Tjäreborg AbNorwayVing Norge ASSwedenThomas Cook Northern Europe AB

The data in this report covers the period 1 October 2017 to 30 September 2018, unless otherwise stated.

This report covers the sustainability strategy, approach and performance of the Nordic segment, as defined above. However, our sustainability

impacts and work are global, and this is reflected in our policies, measures and key data.

If you have any questions related to this report, please address them to:

Thomas Cook Northern Europe, S-105 20 Stockholm SWEDEN

Phone: +46 8 5551 3200



2. OUR VISION FOR SUSTAINABLE TOURISM 3. POLICIES 4. ENVIRONMENTAL SUSTAINABILITY AND HUMAN RIGHTS 6. OUR STAFF 7. ANTI-BRIBERY AND CORRUPTION

#### 1.2 OUR BUSINESS

Thomas Cook Nordic Holdings AB is the parent company of the Nordic segment of Thomas Cook Group. The company is a wholly owned subsidiary of Thomas Cook Group Plc. London, UK, the ultimate parent company of the Group.

Thomas Cook Group is one of the world's leading holiday companies, with sales of £9 billion. We are a team of 22,000 colleagues and we operate from 17 countries.

- · 100 Aircraft
- · 190 Own brand Hotels & Resorts
- · 22 000 Employees
- · 20M customers

The Nordics segment of Thomas Cook Group, Thomas Cook Nordic Holdings AB includes the leisure travel companies and brands:

- · Ving Sweden
- Ving Norway
- · Spies Denmark
- · Tjäreborg Finland
- · Thomas Cook Northern Europe AB

Thomas Cook Northern Europe AB is an operating parent company for the Nordic leisure travel companies and our airlines company Thomas Cook Airlines Scandinavia A / S (sister company to the Nordic segment of Thomas Cook Nordic Holdings AB) and also our hotel company Thomas Cook - Resorts & Hotels, which operates the Sunwing and Sunprime hotel concepts.

Thomas Cook Northern Europe, including sister company Thomas Cook Airline Scandinavia comprises of:

- · 12 aircraft Thomas Cook Airline Scandinavia
- · 2 300 employees
- · 1,6 M customers

The package travel business is complex and wide reaching. Our vision is to be the most loved holiday company for our customers, employees and shareholders. To deliver this promise we are engaged in decisions, large and small, from sourcing airplanes and creating a world class booking journey experience to increase our fuel efficiency and reducing plastic waste in destination. Within Thomas Cook Group we are continuously working toward greater efficiency and higher quality in our product. To this end we have created a matrix organization where many business areas are handled jointly for all or several segments and source markets. Everything we do in the Nordic segment impacts the Thomas Cook Group at large, and conversely our business is heavily impacted by other parts of the Group.



20M

190
OWN BRAND HOTELS
AND RESORTS

100 AIRCRAFT **22,000** EMPLOYEES

EW 2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND HUMAN RIGHTS 6. OUR STAFF A

#### 1.2.1 CLASSIC PACKAGE HOLIDAYS

The heart of our business is classic package holidays, consisting of charter flights transporting customers to our own brand and contracted hotels around the world, where we strive to deliver the best weeks of their year. To deliver this product we use a wide range of suppliers and partners, including airlines, hoteliers, tax free product suppliers, clothing suppliers, excursion providers, cleaning and laundry services, food and beverage services, and IT services.

#### 1.2.2 DYNAMIC PACKAGING

Our complimentary offering consists of trips where the customer is in charge of where they want to go, for how long, and where they want to stay. We provide bookings with regular airlines and a large number of hotels worldwide that live up to our health and safety standards, but where we ourselves do not deliver the services in destination. For this type of travel our main suppliers are airlines and bed bank services.

#### 1.2.3 CRUISE

We have a high-quality cruise offering in addition to our other package holidays. Cruise holidays are provided by cruise lines and booked by our customers through us. We provide additional services, such as connecting flights and hotel nights, as requested by the customer.

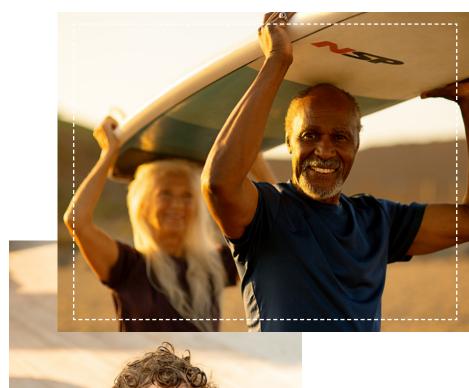
## 1.2.4 STAKEHOLDERS AND PARTNERSHIPS

We work with a variety of sustainability and industry organizations as we understand that collaboration is essential to bring about large-scale change. We are particularly committed to working with our supply chain, competitors and other stakeholders within the travel industry to create positive change.

We define stakeholders as any group with potential or actual influence on our business, including customers, employees, investors, suppliers, governments & regulators, NGOs & charities, academia and industry associations. To ensure we focus on the most material issues and those most relevant to our key audiences, we undertake a wide variety of stakeholder engagement including meetings, questionnaires, newsletters with feedback channels and participation in projects and conferences.

#### Our stakeholders include:

- Customers
- Employees
- Investors
- Suppliers
- · NGOs and charities
- · Governments and Regulators
- · Academia and industry associations





"WE UNDERSTAND
THAT COLLABORATION
IS ESSENTIAL TO
BRING ABOUT LARGESCALED CHANGE."

2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY 6. OUR STAFF
SUSTAINABLE TOURISM AND GUIDELINES SUSTAINABILITY AND HUMAN RIGHTS 6.



The Board retains responsibility for the long-term success of the Thomas Cook Group and the Health, Safety and Environmental Committee (HSE Committee) has oversight of the policy for managing health, safety and environmental risks to the Group's business. We know that a strong governance structure, accountability and leadership are key to drive change. HSE Committee has broadened the scope and approach of sustainability at Thomas Cook, providing leadership, direction and oversight to the activities of the Sustainability Working Group (SWG) and maintaining close stakeholder group links.

Thomas Cook Group operates across 17 different source markets with each facing different challenges. This means that sustainability risks and opportunities are dealt with in different ways across the business depending on specific priorities. Alongside this local focus, strategic direction is provided at a group level by the Sustainability Working Group and the Health and Safety Committee.

Thomas Cook Group operate in a dynamic and rapidly evolving environment. This requires a flexible and responsive risk management process. Risks are evaluated using a risk register approach which assesses the likelihood and impact of each risk, including the financial impact, alongside existing control measures. Risk registers are continually updated through a program of

workshops and risk is formally assessed as an agenda item at all monthly segment level board meetings, with key risks escalated and discussed within the Risk Matters Group.

#### Significant sustainability risks include:

- · Brand reputation
- · Climate Change and greenhouse gas emissions
- Energy cost and energy security
- · Supply chain management
- · Recruitment and retention of talent
- $\boldsymbol{\cdot}$  Sustainability of destinations and communities



1. OVERVIEW

2. OUR VISION FOR SUSTAINABLE TOURISM

3. POLICIES AND GUIDELINES

4. ENVIRONMENTAL SUSTAINABILITY SUSTAINABILITY AND HUMAN RIGHTS

6. OUR STAFF

7. ANTI-BRIBERY AND CORRUPTION

CORRUPTION

1. OVERVIEW

1. OVERVIEW

3. POLICIES AND GUIDELINES

4. ENVIRONMENTAL SUSTAINABILITY

AND HUMAN RIGHTS

6. OUR STAFF

7. ANTI-BRIBERY AND CORRUPTION

# 2 OUR VISION FOR SUSTAINABLE TOURISM

The millions of customers that choose Thomas Cook for their holiday have high expectations of us and the services we provide. We understand that sustainability is extremely important for our customers and critical to the long-term success of our business.

In order to build a more sustainable business we need to have a strategy in place which is closely aligned with the business model.

Our sustainability strategy. "Making a Difference with Every Holiday" reflects three key stages of the customer journey - At Home, The Journey, and On Holiday. The three-year time horizon allows us to set challenging, but urgent and relevant goals, to focus the attention of our business and our supply chain. The United Nations Sustainable Development Goals (SDGs) have helped to frame our strategy. We have demonstrated where our strategy helps to positively influence the SDGs, to play our part in ending poverty, protecting the planet and ensuring prosperity for all.



2. OUR VISION FOR SUSTAINABLE TOURISM 1. OVERVIEW

## 3 POLICIES **AND GUIDELINES**

Our sustainability work is guided by a number of policies and guidelines, both on a Group level and on a Nordic level.

### 3.1 THOMAS COOK GROUP **CODE OF CONDUCT**

The Group Code of Conduct is our main policy document for sustainability and ethics, acting as an umbrella document for all other policies and quideline. It applies to all employees and all areas of business within the Thomas Cook Group. The policy covers our values; our customer promises; behavior towards customers: behavior within the company; health and safety at work; media and social media use; sustainability; community engagement and volunteering; child protection; business risks; supplier relationships; bribery, gifts and entertainment: conflicts of interest and benefits; data protection and confidentiality; speaking out; competition law, trade restrictions and sanctions; information security; share dealing; fraud, theft and false accounting; and political donations and support. Within all these areas the policy sets out the standard to which all employees and the business is expected to adhere, and what process to follow if any deviation from the code is discovered.

Every employee within the Group is required by the Code of Conduct to be vigilant against breaches of the policy, and to report any

deviations found either to a manager or by using the confidential trust line and speaking out functions. Every employee is also required to participate in a yearly training on the Code of Conduct, including the duty to report deviations.

Every year Thomas Cook conducts a Group-wide employee survey, called Every Voice, which measures, among other things, awareness of the code of conduct and whether employees believe the code of conduct is adhered to across the business.

### 3.2 THOMAS COOK GROUP **SUPPLIER CODE OF ETHICS** AND CONDUCT

The Supplier Code of Ethics and Conduct sets out the minimum standards of business behavior expected of Suppliers, who must have processes in place to monitor and maintain these standards. including within their own supply chains. The policy applies to everyone across the Group, in whichever jurisdiction they are located including employees, managers and directors, temporary workers and all third parties associated, and doing business, with us including agents, suppliers, advisors and other business partners and their

employees.

Any new supplier is required to commit to the Supplier Code of Ethics and Conduct, which gives Thomas Cook the right to audit Suppliers to ensure compliance with the Code. For any identified non-compliance with the Code or law, the Supplier must provide a corrective action plan for Thomas Cook's approval. If the non-compliance is unlawful, Thomas Cook has the right to end any contract with the Supplier, without any financial or other liability. Suppliers must also make the TC Supplier Speaking Out Policy available to all their employees and contractors who provide services to Thomas Cook or who are in contact with Thomas Cook employees on a regular basis.

The code covers, among other things, Human Rights, Child Labor, Child Protection from sexual abuse, Forced Labor, Wage and Benefits, Fair Treatment and Equal Opportunity, Health and Safety, Anti-Bribery and Corruption, Gifts and Hospitality, Conflict of Interest, and Our Environment and The Community.

### 3.3 THOMAS COOK GROUP CHILD PROTECTION POLICY

At Thomas Cook Group, we are fully committed to respecting children's rights as set out by the United Nations Convention on the Rights of the Child. The Child Protection policy outlines the company's standards which are in place to safeguard children both customers and local in destinations. The policy outlines Thomas Cook's commitment to provide adequate training, information and support to customers and employees, reporting processes and investigation procedures in order to protect children from harm.

We operate a zero-tolerance policy against any form of abuse, neglect or exploitation.

## 3.4 THOMAS COOK NORTHERN **EUROPE POLICY AGAINST COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN**

Thomas Cook Northern Europe condemns all forms of sexual exploitation of children and supports all acts of law made to prevent and punish such crimes. Thomas Cook Northern Europe demands that guests, partners and all members of staff refuse to take part in sexual 1. OVERVIEW



exploitation of children, and that they report all cases of sexual exploitation of children of which they become aware. Breaching this policy may result in dismissal, reporting to the police and the end of ongoing collaboration.

## 3.5 THOMAS COOK NORTHERN **EUROPE CHARITABLE GIVING POLICY**

Thomas Cook Northern Europe has a policy for charitable giving which focuses our charitable contributions towards the focus areas of working conditions, child labor, environmental sustainability, sexual exploitation of children in tourism and child welfare

## 3.6 THOMAS COOK **AIRLINES SCANDINAVIA ENVIRONMENTAL POLICY**

TCAS has a dedicated environmental policy, which sets out goals for the business in reducing the consumption of fossil fuels; efficient application of resources, such as waste reduction, energy consumption and heating; reduced consumption of environmentally harmful chemicals; noise pollution; and conscious purchasing.

#### 3 7 EXTERNAL AUDITING

#### 3.71TRAVFLIFE

Through our collaboration with Travelife, our work on the environment and social responsibility is

followed up by Travelife independent auditors every second year. Travelife, is a sustainability accreditation scheme, provides guidelines and measurement systems aimed at contributing to improvement in environmental and social responsibility in the travel industry.

Companies associated with Travelife must contribute to society by employing locally, using local suppliers and by marketing local business. They must also work against child labor and child sex tourism.

By 2020 we aim to have all our own branded hotels accredited by Travelife.

#### 3.7.2 FU FCOLABEL

EU Ecolabel is the most stringent and reliable eco-certification currently existing for hotels. Thomas Cook Northern Europe's own Sunwing Resorts work in accordance with the EU Ecolabel. At present no other tour operator in the Nordic countries can offer hotels with the EU Ecolabel.

#### 3.7.3 ISO 14001 CERTIFICATION

Thomas Cook Airlines Scandinavia (TCAS) is ISO 14001 certified since 2010. ISO 14001 requires renewal of the certification every three years and in December 2018 TCAS achieved a new certification for the next three-year period.

#### 3.7.4 STRONGER TOGETHER

Stronger Together is a multi-stakeholder business-led initiative aiming to reduce modern slavery, particularly forced labor, labor trafficking and other hidden third party exploitation of

workers. They provide guidance, training, resources and a network for employers, labor providers, workers and their representatives to work together to reduce exploitation.

Stronger Together conducted an independent wide-ranging review of our policies, procedures. implementation and governance concerning human rights in 2018. The organization brings many learnings and insights from other sectors and have applied them to Thomas Cook in the travel sector.

They visited a number of our destinations to examine our work first hand. Their recommendations included better tracking of the implementation of our policies and expanding our training programmers. These have been reviewed by the board and we are rolling out a program of policies to address these issues over the next vears.



2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL SUSTAINABLE TOURISM AND GUIDELINES 4. ENVIRONMENTAL SUSTAINABILITY AND HUMAN RIGHTS 6. OUR STAFF 7. ANTI-BRIBERY AND CORRUPTION

# 4 ENVIRONMENTAL SUSTAINABILITY

Our environmental work focuses primarily on our airline and hotel's environmental impact. Our airline, Thomas Cook Airlines Scandinavia, has been certified according to ISO 14001 since 2010. Our modern aircraft fleet, environmentally-friendly investments and very high occupancy rates have resulted in low emissions per passenger.

In 2015, the airline received 8 new Airbus A321s replacing older models, and with these new aircrafts, which are much more fuel-efficient, they have contributed to further CO2 reduction. Our fuel consumption is recorded and evaluated continuously and has been reduced.

Thomas Cook Airlines Scandinavia was also the first airline in Europe to start with waste separation onboard in 2001. Today we sort all waste on all our flights and by this investment and initiative we have managed to reduce waste by 70 percent since 2001.

During the last 15 years Thomas Cook Airlines Scandinavia has also been working with so-called "green flights". This means that every part of the flight is optimized to be as environmentally friendly as possible. The process is divided into several stages: planning of route before start, departure, journey, approach and landing. The benefits of "green flights" it to reduce fuel consumption, less noise and increased comfort for the guests.

Our environmental work impacts all parts of our company. In our home organization, in offices and in stores we work towards reducing energy consumption and waste.

In 2016 (Denmark) and 2017 (Sweden), energy mapping was conducted by auditor for Swedish and Danish entities based on the EU Energy Directive (EED) to use energy more efficiently at all stages of the energy chain. New audits to take place every fourth year.

#### 4.1 CO2 EMISSIONS

Climate change is a real and significant risk facing people and planet. The World Economic Forum lists climate change and extreme weather events in the top 5 global risks, both in terms of likelihood and severity. Travel and tourism not only contributes to climate change but will be increasingly affected by climate change, according to the Intergovernmental Panel on Climate Change (IPCC) special report on the impacts of a global warming of 1.5 °C highlighting the increased risk to coastal tourism. Airlines will also suffer negative consequences as a result of climate change, such as increased disruption to routes, increased turbulence, reduced aircraft performance and loss of critical infrastructure.

Air transport accounts for 2% of global manmade CO2 emissions. With passenger numbers and emissions predicted to rise in the future,



"CLIMATE
CHANGE IS REAL
AND SIGNIFICANT
RISK FACING THE
PEOPLE AND THE
PLANET."

International Civil Aviation Organization (ICAO) has taken action across the industry in the form of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). This scheme aims to aid the air transport industry in achieving carbon neutral growth from 2020.

The risks presented by climate change directly impact our business, both now and in the future. As such we take our climate change impacts seriously and are acting to improve our environmental performance and limit our impacts across all areas of our business.

Reducing emissions is a priority across the Thomas Cook Group. Carbon emissions from our airline is our single biggest environmental impact and as such we have a specific focus on the Group Airlines emissions intensity. This work is common to all the group airlines companies, including Thomas Cook Airline Scandinavia's (TCAS).

#### **2020 TARGET: ON THE JOURNEY**

Thomas Cook Group has set an ambitious target to improve fuel efficiency by 12% across the Group Airlines by 2020, against a 2008 baseline.

In 2018 Thomas Cook Airline Scandinavia (TCAS) emissions per passenger km were 67.26 gC02. Measured against the Group target TCAS has an 11.2% improvement in efficiency.

Although Thomas Cook Airlines Scandinavia is very close to achieving the Group target, as a Group have we not made the progress we would like due to a number of external factors. Delays

in implementing Single European Sky, designed to increase the efficiency of air traffic management, has hindered airline efficiency over a number of years, and one-off issues such as European air traffic controllers staging a series of strikes this year has also impacted on our fuel efficiency.

Internally work has begun to review and agree future fuel efficiency initiatives, with successful initiatives rolled out across the Thomas Cook Group Airlines continuing our reductions in g CO2/PKM.

We work hard to reduce our impact, from running our operations more efficiently to generating our own energy - TCAS generates 20% of its own power following the installation of the largest solar power system in Copenhagen Airport on the engineering hangar roof.

### 4.2 TRAVELIFE

Thomas Cook Group work extensively with our hotel brands to enable our customers to experience local products and services, giving them an authentic taste of the local culture and helping the local economies thrive.

Hotels are key to sustainable destinations. They play an important role in protecting the local environment and improving the lives of local communities. Hotels must demonstrate they are managing these impacts.

By 2020 Thomas Cook Group aim to have all our own branded hotels accredited by Travelife, the internationally recognized scheme which

"WE TAKE OUR CLIMATE CHANGE IMPACTS SERIOUSLY AND ARE ACTING TO IMPROVE OUR ENVIROMENTAL PERFORMANCE AND LIMIT OUR IMPACTS ACROSS ALL AREAS OF OUR BUSINESS." .....Thomas Cook 1. OVERVIEW 2. OUR VISION FO

3. POLICIES AND GUIDELINES .ENVIRONMENTAL SUSTAINABILITY 5. SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

6. OUR STAFF

helps hotels and accommodations to manage and improve their social and environmental performance. This is a significant challenge. With different types of hotels in many regions of the world, influencing our partners and supply chains and is not always easy and not all hotels fall within our direct control.

#### **2020 TARGET - ON HOLIDAY**

In 2018 a total of 56 (30%) of Thomas Cook Group's own branded hotels were Travelife certified.

# THOMAS COOK GROUP PLASTICS PLEDGE

We will remove 70 million disposable articels in plastic

Thomas Cook Group will reduce the use of plastic and the pollution in the oceans. The amount of plastic waste that ends up in the Mediterranean is increasing by 40 per cent in the summer months\*. which shows a direct link between tourism and plastic dumping. In view of the environmental impact of plastic waste, Thomas Cook Group has initiated long term efforts to reduce the use of plastic. In the summer of 2018, a campaign was conducted at ten of Thomas Cooks concept hotels as an effort to make quests abandon straws. It reduced the use of straws by almost 50 percent, equivalent to over a million straws. The plastic drink stirrers used on our airplanes are also a volume product that is now removed on board all flights with Thomas Cook Airlines.

Our goal is to remove 70 tons of plastic by the end of 2019, as a first step in the longterm initiative #noplaceforplastic.

\*2018 WWF report "The Holiday Plastic Choking Our Oceans".



#### OUR OBJECTIVES UNTIL 2020 IS TO:

- Remove 70 million plastic disposable items at our offices, own concept hotels and air crafts (Thomas Cook Airlines). This corresponds to 70 tons of plastic, or 3 500 packed suitcases, most of which will be removed by the end of 2019. On our air crafts, for example, whole nine million straws and stirrers.
- Where possible, replace disposable items from recycled plastic biodegradable or compostable options.
- Ensure that plastic objects are disposed of at recycling stations
  where facilities are available. We will work together with suppliers,
  government and travel industry to improve waste management and
  recycling opportunities at our destinations.
- Use our size as a business to influence customers, employees, suppliers and travel industry to spread knowledge about this issue.

1. OVERVIEW

2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL SUSTAINABLE TOURISM AND GUIDELINES

4. ENVIRONMENTAL SUSTAINABILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF 7. ANTI-BRIBERY AND HUMAN RIGHTS

7. ANTI-BRIBERY AND CORRUPTION

# 5 SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

# 5.1 SUPPORTING AND ENGAGING IN LOCAL COMMUNITIES

By supporting and engaging in social project at our destinations, we want to support the local communities, people and surroundings we meet in our destinations.

Thomas Cook Northern Europe and Thomas Cook Airlines Scandinavia has a long standing social engagement in Mexico, The Gambia and Thailand with contributions to hospitals, schools, and people in need in the community.

Thomas Cook Northern Europe also support the nongovernmental organization ECPAT Sweden. ECPAT collaborates with other NGO: s, authorities and part of the industry to fight commercial sexual exploitation of children. The organization was established in 1996 and is a member of ECPAT International's global network with representation in over 70 countries.

Ving Sweden is committed to My Special Day (Min Stora Dag), a nongovernmental organization, granting wishes for Swedish children and teenagers 4-18 years old, with serious illnesses and diagnoses.

#### **2020 TARGET: AT HOME**

To reach 100 000 people - Thomas Cook Group

Within Thomas Cook Northern Europe we reached approximately 4 000 people through our charitable programs and supporting project in communities during 2018.



#### SUPPORTING THE COMMUNITY OF THE GAMBIA:

For 12 years, Thomas Cook Northern
Europe annually sends a container filled
with furniture and healthcare equipment
that goes to different hospitals in The
Gambia. The project is being carried out in
cooperation with Swedish hospitals and
medical centers. We have also collected
clothes, bicycles, toys and other things that
are needed in the local society. Thomas
Cook also handles all shipments, and one
of the company's employees is in place
to ensure that everything reaches the
right recipients. During 2018 we sent two
containers of equipment - 30 tones per

This year, Victoria Hospital and Bansang Hospital received medical equipment and supplies. Hart House, a school for disabled children, has received money to build a washing station. Clothes, bikes and other supplies has reached the local community

1. OVERVIEW

2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY 6. OUR STAFF 7. ANTI-BRIBERY AND CORRUPTION 1. OVERVIEW 5. SUSTAINABLE TOURISM AND GUIDELINES SUSTAINABILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF AND CORRUPTION 1. OVERVIEW 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY 6. OUR STAFF 5. SOCIAL RESPONSIBILITY 5. SOCIAL RESPONSIBILITY

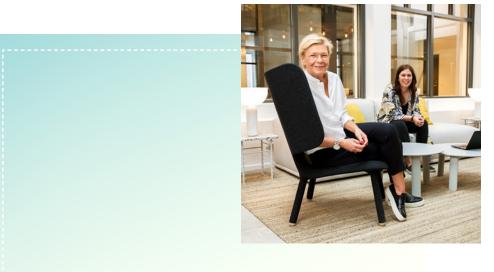


Our aim is to be the most loved travel company. This can only be achieved by ensuring we have a truly engaged and diverse workforce.

We take great care to make sure our recruitment and selection process, learning and development activities and career progression opportunities do not allow for discrimination.

Active recruitment ensures a variety of men and women of different ages, backgrounds and experiences. We have a very active process of goal setting and development plans for each employee, to ensure that our business objectives and strategy are carried out at every level of the business and that employees are engaged, focused and receive training and career development opportunities.

Our annual Group-wide employee engagement survey "Every Voice" provides our people with the opportunity to provide detailed feedback about how they feel about working at Thomas Cook. Results from the survey are shared with each team so they can build detailed action plans to ensure continuous improvement.





1. OVERVIEW

2. OUR VISION FOR 3. POLICIES 4. ENVIRONMENTAL 5. SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

7. ANTI-BRIBERY AND CORRUPTION

# 7 ANTI-BRIBERY AND CORRUPTION

# 7.1 CODE OF CONDUCT AND POLICIES

Our Code of Conduct contains established guidelines on how we as employees are expected to act in relation to business partners, colleagues and customers. We require our suppliers to sign our Code of Conduct for Suppliers, Supplier Code of Ethics and Conduct, which sets out minimum standards for the business behavior we expect from our suppliers.

Our Anti-Bribery and Corruption Policy includes a list of actions and circumstances that constitute warnings for corruptions. It also clarifies our zero tolerance with all forms of bribery and corruption, both internally and externally.

If suppliers violate our policies, we are entitled to cancel contracts immediately and without penalty.

To ensure that our policies are complied with, there is a whistleblowing function for reporting wrongdoing (illegal or unethical conduct) or malpractice. Our Supplier Speaking Out Policy specifically describes how suppliers and their employees should proceed to confidentially report violations to our established standards,

such as health and safety risks, unethical behavior, suspected crime or corruption.

Our Inclusion and Diversity Policy is about that we across Thomas Cook are committed to embracing Inclusion and Diversity. The framework of the policy sets out our commitment, to our customers and to each other, and what we are doing to support this.



