



# Modern Slavery Statement 2024

January 2025

## Modern Slavery Statement 2024

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps TUI Group has taken to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain, up to and during the 2023 financial year (1st October 2023 to 30 September 2024).

### Introduction

The travel and tourism market is a significant contributor to the global economy<sup>1</sup>, growing above global GDP levels pre-pandemic<sup>2</sup>. The sector is expected to deliver its highest ever global economic contribution in 2024<sup>3</sup>. Demand for tourism is driven by strong fundamental trends – people living longer, healthier lives; the growth of middle classes across the globe, which increases disposable income; and the desire for experiences, of which travel plays a significant part. This demand has proved highly resilient – after the disruption of COVID-19 and resulting travel restrictions, international arrivals were almost back to 2019 levels in 2024 (January – July)<sup>4</sup>. At TUI, we experienced a strong uplift in bookings for our destinations on the easing of government travel restrictions during the pandemic. In financial year 2024, Markets + Airline had 20 million customers, 7% ahead of financial year 2023 levels. Therefore, we expect leisure tourism to continue to be an attractive growth market over the long-term.

The industry still faces some key challenges. Geopolitical events, cost inflation (driven by higher energy costs and labour supply shortages), higher interest rates and foreign exchange fluctuations still persist, impacting supplier cost bases, as well as putting a squeeze on household income and hence consumer sentiment. In turn, this reinforces customer needs for brands which they can depend on, and which deliver choice and flexibility in configuring the right product for them. TUI's focus on delivering quality to our customers while increasing choice and flexibility, both in terms of our product offer, and by increasing the flexibility of flight and hotel sourcing, mean that we can deliver growth by offering value and choice, without additional risk capacity.

Climate change is a pressing global challenge. There is an urgency to act and for everyone to play a role in the transition to a low carbon economy. TUI has committed to Science Based Targets, in order to significantly reduce carbon emissions in our airline, hotels and cruise business by 2030, with a further commitment to reach net-zero by 2050 at the latest. In addition, our Sustainability Agenda sets out our wider commitments to sustainability, in terms of People, Planet and Progress.

### About TUI Group and its supply chain

TUI is a leisure experiences group covering the entire holiday journey, serving millions of customers, operating 125 aircraft, 433 hotels (including our concept hotels) and 17 cruise ships<sup>5</sup>, as well as a sizeable experiences, transfers and tours business. The group is structured into two divisions – Holiday Experiences and Markets + Airline.

**Holiday Experiences** delivers differentiated content in hotels, cruises, experiences, transfers and tours:

- Our hotel portfolio consists of own and differentiated leisure brands covering the luxury (The Mora, Royalton), global (Riu, Robinson, TUI Blue, TUI Magic Life), regional (Atlantica, Grupotel, Iberotel, Akra) and price-conscious (TUI Suneo, AQI) segments. The portfolio is well-diversified in terms of product offer, customer segments, destination mix and ownership models, and benefits from multi-channel and multi-source market distribution via Markets + Airline, direct

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<sup>1</sup> Based on WTTC Economic Impact Research 2023 – Travel & Tourism sector contributed 10.4% to global GDP in 2019; this decreased to 5.3% in 2020, 6.1% in 2021 and 7.6% in 2022, due to government restrictions on mobility. However, Travel & Tourism GDP climbed back to 88% of 2019 levels in 2023.

<sup>2</sup> Based on UNWTO international travel arrivals CAGR versus global GDP CAGR for 2015 to 2019

<sup>3</sup> Based on WTTC press release, April 2024

<sup>4</sup> Based on UNWTO, World Tourism Barometer, September 2024

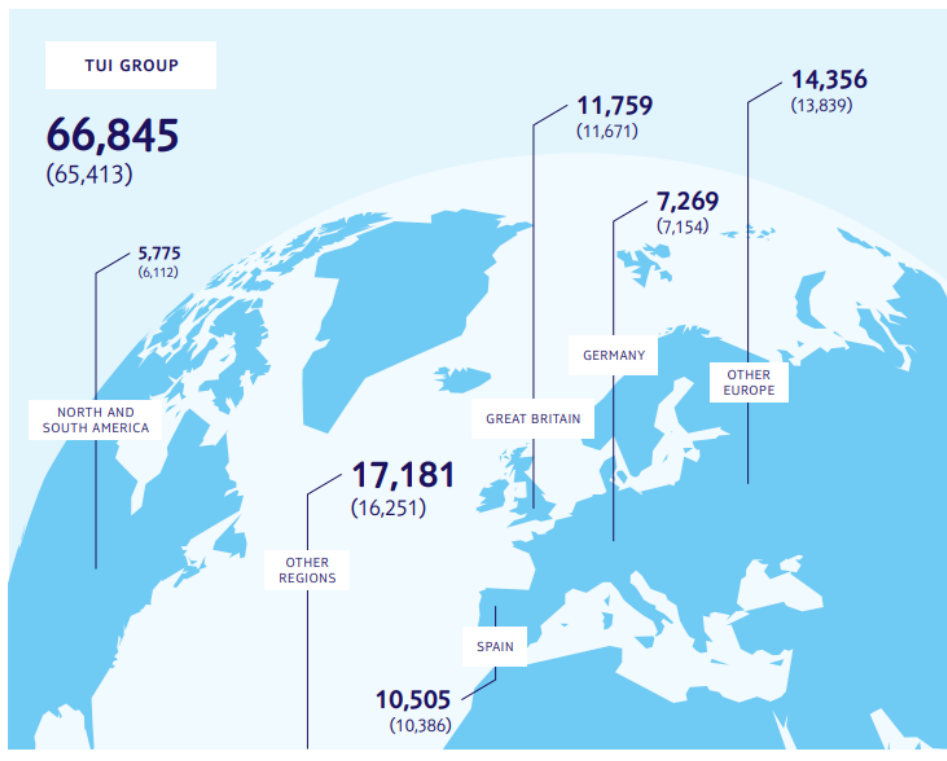
<sup>5</sup> As at 30 September 2024, including concept hotels in third party properties

to customer, and via third parties such as Online Travel Agents (OTAs) and tour operators mainly outside our own source markets.

- Our three cruise brands (Mein Schiff, Hapag-Lloyd Cruises, Marella) cover the cruises sector from premium all-inclusive to luxury to expeditions, with leading positions in the German-speaking and UK markets<sup>6</sup>, benefitting from multi-channel distribution via Markets + Airline, direct to customer and via third party intermediaries.
- TUI Musement is one of the largest<sup>7</sup> digital providers in the online intermediary market for tours and activities, including experiences (excursions, activities and tickets) and tours (multi-day tours), connecting our own and third party product portfolio in destinations with Markets + Airline customers, direct to customer and via third parties; as well as providing transfers and customer support in the destination.

**Markets + Airline** distributes and fulfills package holidays, components and ancillaries to a large customer base in more than a dozen source markets. TUI holds multiple digital and physical touchpoints with its customers, and therefore delivers a strong blend of digital and human interaction.

Personnel by region\* (30 SEPTEMBER 2024)



\* By domicile of company  
In brackets: previous year

As shown in the graph, we employ people from all around the world. In addition to our direct employees, our diverse business encompasses an extensive supply chain, with thousands of suppliers in more than 90 countries – from manufacturers of aircraft and cruise ships to hotel laundry services, excursions in destination, tourist guides and other destination services used by our customers.

Our biggest supplier category continues to be hotel partners, representing over half of our direct operating costs. Accommodation suppliers therefore continued to be a central focus of our due diligence.

<sup>6</sup> As measured by capacities

<sup>7</sup> As measured by market share, Skift State of Travel 2024

## Governance and policies

Due to the German Supply Chain Act, it was decided to define a combined governance structure to encompass both commitments in one single framework.

The Executive Board of TUI AG has appointed a **Human Rights Officer**. He monitors whether an appropriate and effective risk management system has been put in place to comply with due diligence obligations within the company. He is responsible for ensuring the strategy for securing risk management in all relevant business processes through appropriate measures and regularly reports on this to the GEC.

In the **Group Sustainability department**, the employees responsible coordinate the resulting tasks with the various departments and report to the Human Rights Officer. They coordinate, in consultation with other Group functions, the implementation of the various appropriate risk analyses, the establishment of the risk management system and monitor the timeliness of risks and the implementation of appropriate remedial measures. This area is also responsible for reporting. In this context, relevant information is collected across the Group, progress and incidents are reported, the annual report is prepared and future legislation on environmental, social and corporate governance due diligence is reviewed.

In order to comply with the due diligence obligations under the GSCA, the following departments liaise with their colleagues in Group Sustainability on the tasks assigned to them:

**Group Integrity & Compliance, Data Privacy:** The team Integrity & Compliance is responsible for setting up an appropriate complaints procedure at Group level and ensuring that the relevant requirements are met. It is responsible for coordinating the receipt and processing of suspected cases and for contacting and liaising with the relevant departments/entrusted individuals.

**Group Legal:** The team supports the relevant TUI companies in cooperation with Group Purchasing, Group Procurement, and other relevant departments and TUI companies. Its role is to ensure that legal documents (for example, contractual clauses) comply with legal requirements and are implemented in an appropriate manner.

**Group Risk Management:** The department provides a uniform risk management methodology across the Group, which is also applied to compliance risks in connection with the GSCA. This process is supported by integrated risk and control software, which enhances transparency regarding risks, controls, measures, competencies and responsibilities. Risks are continuously identified, assessed and processed as part of day-to-day operations.

**Human Resources:** This area is responsible for managing appropriate risk and remediation processes related to human rights compliance for employees in its own business area. It is also responsible for reporting on progress and cases/remedial actions, developing and delivering training, and developing and implementing the TUI Global Employment Statement.

**Occupational Health and Safety:** The team is responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures in relation to health and safety issues as well as ensuring that risk identification and control measures are properly documented.

**Purchasing and Procurement:** These teams are responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures with direct suppliers, reporting on progress and cases, as well as maintaining and updating the risk analysis methodology for the supply chain in collaboration with the Group Sustainability team.

**Group Corporate & External Affairs:** This team establishes and maintains contact with political decision-makers and authorities in relation to upcoming legislation and ensures close and transparent collaboration with associations in the development of shared positions.

**Communications:** The communications team is responsible for preparing internal and external communications relevant to the Group in the event of public enquiries, for example from non-governmental

organisations or the media, in collaboration with the Group Sustainability team, as well as providing updates and handling internal communications regarding progress.

**Group Internal Audit:** Group Internal Audit reviews implemented GSCA processes to ensure compliance with controls as well as their appropriateness and effectiveness.

TUI has a number of policies and initiatives in place to monitor, identify, mitigate and prevent human rights impacts in line with the UN Guiding Principles on Business and Human Rights. As described in our previous Modern Slavery statements, topics addressed include responsible recruitment, discrimination, forced labour, child labour, salaries and benefits, freedom of association and collective bargaining, health and safety, diversity as well as people development and a feedback culture. In line with the German Supply Chain Act requirements, a revision of relevant TUI policies, e.g. the Human Rights Statement, was conducted in 2024.

## **Risk assessment**

Appropriate risk analyses are carried out as part of risk management to identify human rights and environmental risks in the company's own business area and along the supply chain. Ad hoc risk analyses are initiated in the event of a significant change or increase in the risk situation within the supply chain.

A risk management tool is used to carry out risk analyses. This system offers a comprehensive software solution for the IT-supported implementation of GSCA requirements, enabling risk and supplier management based on GSCA criteria. The software provides a detailed overview of the company's own business area, direct suppliers and, with the appropriate knowledge, indirect suppliers and appropriately maps their specific human rights and environmental risks. Direct suppliers and companies within the company's own business area are entered into the system. Using recognized indices and press releases, an abstract risk is determined for each company and each protected legal position. These risks are categorized as "low", "medium" or "high". Depending on the abstract risk disposition, the concrete risks for individual suppliers are determined in a second step. The specific risk is calculated based on a self-assessment, proof of compliance with audit-based standards, or other findings from the supplier relationship. Individual preventive measures can then be implemented based on the specific risk.

**Detailed procedure in own business area:** Of all managed Group companies, those that employ their own employees were selected for the abstract risk analysis, regardless of whether they are permanent, temporary, domestic or foreign. Based on the results of the abstract risk analysis, taking into account country and sector risk, the companies were prioritized according to the risk identified. Companies that were initially classified as high risk were sent a questionnaire to answer detailed questions about their risk exposure.

**Detailed approach in the supply chain:** Due to the different purchasing processes in each of the individual business areas, four different risk analyses were carried out based on the same risk analysis methodology. This methodology was performed in two steps: an abstract risk analysis and a concrete risk analysis. The responsible areas are Group Procurement, Accommodation Procurement and the TUI Airline and TUI Museum segments.

In all four areas, an abstract risk assessment of the respective suppliers was first carried out using the risk management system. This assessment was based on defined criteria: industry risk, country risk and total volume/turnover. The results of this assessment determined the applicability of the risk questionnaire and consideration of other existing risk-minimizing measures. Suppliers identified as having a "high" risk exposure in the initial assessment were asked to complete the risk questionnaire.

## **Actions and performance measurement in modern slavery prevention in 2024**

We believe that everyone should be treated with respect and dignity. We do not accept discrimination based on origin, ethnicity, gender, gender identity, sexual orientation, marital status, religion, world view, disability, age or social origin, and we are committed to constantly improve diversity and inclusion across our growing business. We continue with the expansion of our inclusion programmes across the Group, including initiatives

such as Diversity and Inclusion (D&I) groups, key events and theme days as well as continued external partnerships.

In the completed financial year, particular attention was devoted to optimising risk management around human rights and environmental due diligence along the supply chain, further developing and implementing risk analyses as well as preventative and remedial measures. A Supply Chain Due Diligence Committee was set up for internal management purposes. Its members represent central departments such as Group Sustainability, Group Legal, Purchasing and Procurement and Human Resources. This committee monitors the implementation status of due diligence obligations in the supply chain on a quarterly basis, discusses potential cases and next steps and takes key decisions.

Moreover, a new risk management tool was introduced in the financial year under review, which is used both for the supply chain and for the Company's own business operations. This system will be used henceforth to carry out the annual risk analyses required by law.

**Complaint procedure:** In 2024, we continued to operate our Group-wide whistleblower system - the SpeakUp Line - to ensure a confidential reporting channel is available for all our employees as well as third parties. The whistleblower system meets the requirements of the German Supply Chain Due Diligence Act and the EU Whistleblowing Directive. In 2024, a total of 75 reports (2023: 50 reports<sup>8</sup>) were received through the SpeakUp Line, of which 23 reports related to human rights risks or environmental obligations. Additionally, in four cases, use was made of the opportunity to report infringements directly to the relevant line manager, the appropriate Compliance contact or the Compliance Mailbox. All 27 human rights and environmental related reports led to further investigations, which in three cases resulted in further measures.

**Engaging with our stakeholders:** The TUI Group recognises the importance of collaborating with others to address human rights and modern slavery in our industry. In 2024 we engaged with a wide range of organisations as demonstrated through the following activities and initiatives:

- To support industry-wide progress we continued to sit on the boards of the Global Sustainable Tourism Council (GSTC) and Travelife, both of which are addressing these issues through sustainability certification standards for hotels.
- Our external website for suppliers (TUIPartners.com), which includes Human Rights and Child Protection guidelines and best practices was updated with further information on human rights and environmental related risks in the tourism sector.
- Another activity in the completed financial year was the creation of an e-learning programme for suppliers to address human rights and environmental standards in the tourism sector. This training programme was designed in cooperation with other companies in the travel industry in the framework of our Futouris membership. Futouris is a sustainability initiative set up by the travel industry that is committed to promoting ecologically and socially responsible tourism.
- Destination stakeholder initiatives: An important aspect of protecting young children and adolescents at risk of trafficking, commercial sexual exploitation and/or exploitative labour practices is giving them the tools and support they need to help prevent and identify exploitation before it happens. In addition to policy, auditing and training, through our corporate foundation, the TUI Care Foundation, we invest in prevention by taking proactive steps to support young people.
- Tui Academy: Offering vocational training for disadvantaged young people to access high quality education, work experience, life skills coaching and a brighter future. The programme offers vocational education and sustainable career opportunities to young people from vulnerable communities. With a combination of theoretical education and life skills coaching, the programme focusses on the potential of tourism as an established driver of global job creation and growth. Each

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<sup>8</sup> All key figures on compliance violations reported in the previous year had to be adjusted due to a change in the calculation methodology

destination programme is unique and offers various qualifications. At the moment the TUI Care Foundation supports TUI Academies in the Cape Verde, Dominican Republic, Jamaica, Kenya, Montenegro, Morocco, Sri Lanka, Thailand, Senegal and Zanzibar.

**Training and awareness:** Raising awareness of human rights and modern slavery across our business continues to be a key focus area for TUI Group. To do so, we run a bi-annual mandatory training programme on child protection and modern slavery at TUI Musement.

- As part of this training programme, 4,589 trainings in Child Protection and 4,423 trainings in Human Rights were conducted in 2024. The e-learning sessions have been integrated into TUI People, a global internal HR and learning platform, which is a more efficient and better tool to track completion.
- Airline crews in the UK, Nordics and Germany receive Vulnerable Children & Trafficking Training during their inductions, where they learn about how to spot trafficking and what to do.
- Our internal Child Protection Guidelines also include information for our colleagues on “voluntourism” and visits to orphanages and schools, what activities are currently being offered on the market, the issues surrounding it and what TUI is doing to this respect, including: Prohibiting any type of visits to orphanages during TUI activities, no interaction between local children and TUI guests during any activities, visits to schools only outside of school hours or without interrupting classes, partnering with [The Code](#) on working against child sex tourism.
- Travelife, our key hotel sustainability certification partner, has created [a sustainability e-learning](#) for all its members to raise awareness about modern slavery practices such as bonded labour and exploitation.

## Progress in 2024 and Outlook 2025

PERFORMANCE MEASURE	PROGRESS IN 2024	FOCUS FOR 2025
<b>Number of customers staying in certified hotels</b>	12.1 million customers staying in 2,051 certified hotels, compared with 10.5 million in 2023. This means an increase of 14.9% vs 2023.	We will continue working to increase the number of hotels offered with sustainability certification.
<b>Number of colleagues trained on human rights in tourism</b>	Over 9,012 colleagues trained on human rights in tourism, as part of annual mandatory e-learning process.	We will continue expanding our training to more colleagues in offices and destinations and across our hotels and airlines.
<b>Actions taken to strengthen our policies</b>	We continued to communicate our policies around our business and supply chain.	We will continue working on ways to strengthen our communication regarding existing policies.
<b>Steps taken to initiate and strengthen supply chain management</b>	We further optimized the requirements of the German Supply Chain Act. Risk management and procedures were revised and a risk analysis tool was implemented.	In 2025, we will further work on the defined processes and check for optimizations. Furthermore, we will roll-out the supplier trainings developed within our multi-stakeholder cooperation with Futouris e.V.
<b>Number of cases reported and actions taken in response</b>	In 2024, a total of 75 reports were received through the Speak Up line, 27 reports related to human rights risks or environmental obligations.	We will continue to raise awareness of reporting mechanisms, address stakeholder concerns and take appropriate actions.
<b>Projects and partnerships in place to uphold human rights in our destinations</b>	TUI Academy, as part of the TUI Care Foundation programmes, offers vocational education and sustainable career opportunities to young people from vulnerable communities.	TUI Care Foundation will continue to work on and expand projects, with a focus on youth empowerment to help prevent exploitation in the first place.

This Modern Slavery Statement was approved by the TUI Executive Board and signed off by Thomas Ellerbeck, Group Director Corporate & External Affairs & Chief Sustainability Officer, on January 22, 2025.