

Sunspot Tours Limited

Modern Slavery and Human Trafficking Statement

1. Summary

Section 54 of the United Kingdom Modern Slavery Act 2015 (“**MSA**”) requires certain businesses to disclose concerning their efforts, if any, to ensure there is no modern slavery or trafficking in their organisation or supply chain.

This obligation applies to Sunspot Tours Limited (“**Sunspot**”) and the following statement is made pursuant to Section 54 of the MSA.

2. Description of business and supply chain

2.1 *Description of company group structure*

Sunspot is the parent company in the Sunspot group, which also includes trading subsidiaries Sunspot Tours (Transportation) Limited and Sunspot Tours (Malta) Limited and dormant subsidiary Mercury Holidays (Australia) Pty. Limited. This statement is made on behalf of all companies in the Sunspot group.

2.2 *Business of Sunspot group*

The principal business of the Sunspot group is to provide package holidays to destinations worldwide, including for example Malta, Croatia and Australia.

Sunspot takes its legal obligations and duties of Corporate Social Responsibility very seriously. We also take extremely seriously our legal and compliance obligations in our business conduct and strive to observe these.

2.3 *Description of policies*

The Sunspot group adopts a zero tolerance stance in relation to modern slavery and human trafficking. We only engage workers where labour has been freely chosen (see further Section 5 below). We will not work with suppliers where it comes to our attention that they have been involved in offences related to forced labour and child labour. Likewise, we will not tolerate any employee of the Sunspot group being involved in slavery or trafficking.

2.4 *Description of our supply chain*

The Sunspot group has a large supply chain, comprised of the types of vendor expected for a business of our size and scale. Our principal suppliers are hotels, airlines and domestic tour operation companies. Other suppliers include, for example, print and paper suppliers, who tend to be based in the UK.

Notably, our biggest purchases are hotel rooms and flights for our customers, as well as ground services in resorts. We also purchase brochures and advertising space.

3. Details of checks and due diligence to be conducted on members of the supply chain

The Sunspot group undertakes on-site inspections of hotel providers, these checks being carried out by its own staff. Hotel providers are not only our biggest single class of provider but also that which poses the greatest slavery or trafficking risk.

As part of the inspection process, we require hotel suppliers to divulge to us information about their business practices. Inspectors will raise any red flag issues they perceive regarding any hotel they visit. To date, none of our inspections have resulted in any discoveries of incidences related to forced labour or human trafficking.

The Sunspot group is willing to terminate relationships with suppliers where they are found to present an unacceptable risk in terms of their modern slavery or human trafficking exposure.

4. Training

The Sunspot group is currently taking steps to raise awareness for key staff on issues related to modern slavery and human trafficking issues.

In particular, as we have mentioned above, we consider it important that employees who perform inspections on hotels should have a good awareness of slavery issues. We are also keen for staff involved in our recruitment / HR function or in procurement (purchasing) activities to have a good awareness of these matters as they are the most likely within the organisation to encounter them in their day-to-day duties.

5. Employment

In the context of our own organisation, we are committed to the principle that those who work for us must have chosen their work freely and must be treated with dignity. Sunspot is committed to paying its workers no less than the living wage in the UK. As an organisation, Sunspot is living wage accredited in the UK.

Sunspot will take very seriously any instance of suppliers being involved directly or indirectly in modern slavery or human trafficking. Sunspot will not tolerate any of its officers or employees being involved in modern slavery or human trafficking. Any such employee can expect to find themselves the subject of serious disciplinary actions in accordance with our employment manual and contract of employment.

[It is also the intention of Sunspot to set up a whistleblowing hotline through which employees can raise any suspicions they may have from time to time that modern slavery or

human trafficking may be taking place in Sunspot' organisation or supply chain Employees will be reassured that where suspicions are reported in good faith, they will receive no sanction if these ultimately turn out to be unfounded.

6. Risk assessment

Sunspot has, in the 2017/2018 financial year, considered the nature of its operations and supply chain and identified hotel providers as carrying an elevated risk with regard to modern slavery and human trafficking. We are therefore committed to ensuring our inspectors are aware of this risk. We are also looking to amend our trading conditions to make it a contractual condition that hotels are in no way involved in modern slavery or trafficking.

We have also reviewed the geographical locations of our business activities against the Global Slavery Index (<https://www.globalslaveryindex.org/>). Nearly all of our operations are conducted in areas which are not considered to pose a high slavery or trafficking risk.

7. Effectiveness of policies

In general, we will keep our slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results.

Any questions or queries in relation to this statement should be directed to: Emma Lyttleton (email: ebugeja@mercuryholidays.com).

Signed



Director **EMMA LYTTLETON**

Date 19/12/17

