



Human Rights Toolkit

Training package on the German Supply Chain Act for TUI partners

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**German Supply Chain Act
&
the implementation at TUI Group**

What is the German Supply Chain Act?



The Supply Chain Act **is a law** that applies to all large German companies with more than 1,000 employees and requires identification, assessment and remedy of issues in the supply chain related to **human rights** and **environmental protection**.



It **requires** companies to conduct a **risk analysis** on human rights and environmental issues with regard to their **own activities** and business relationships **within the supply chain** and to implement **preventive** and **mitigation** measures related to those risks.



Companies must ensure to define responsibilities within the company – e.g., a **Human Rights Officer** - to be responsible for monitoring risk management.



Why does a German law affect TUI suppliers in other countries? Suppliers abroad are affected because German companies **are obligated** to fulfill human rights and environmental due diligence obligations **along their entire supply chain**.



Violations of human rights and environment-related obligations are **sanctioned** by the monitoring authority.



Applicable since **January 1st, 2023**.



What type of issues are considered?



Which human rights are at issue:

The Act identifies the international conventions enshrining human rights and defines supply chain-specific risks that must be considered when fulfilling due diligence obligations. These include:

- Prohibition of **child labour**
- Protection against slavery and **forced labour**
- Disregard of occupational **health and safety** obligations
- Disregard of **freedom of association**
- **Unequal treatment** in employment
- Prohibition of withholding an **adequate living wage**
- Severe **environmental damage**
- **Unlawful taking** of land, forests and water
- **Abuse of power** by public or private security forces



Which environmental issues are considered:

Certain **environment-related risks** are also covered, when they **lead to human rights violations** (e.g. poisoned water).

Also, **banning substances that are dangerous** to humans and the environment:

- Use of **mercury** in products and production (Minamata Convention on Mercury)
- Use and production of **persistent organic pollutants** (Stockholm Convention on Persistent Organic Pollutants)
- **Import and export of (hazardous) waste** (Basel Convention on Transboundary Movements of Hazardous Wastes and their Disposal)



What is expected of suppliers and partners?

Five rules for complying with the Supply Chain Act



Acknowledge Responsibility

Making human rights and environmental topics an integral part of the company



Analyse Risks

Assessing where your company potentially and actually impacts human rights



Manage and reduce risk

Prevent human rights breaches and solve existing ones



Information and communication

Inform internal and external stakeholders of the initiatives in place



Complaints procedure

Provide a mechanism that allows complaints and incidents to be reported

Requirements for TUI

TUI Partners

Partner needs to be aware of the TUI Human Rights Statement and all its implications

Whenever required, partners must analyse potential risks identified by TUI

If issues have been reported, partners are required to investigate and mitigate them

Transparency and collaboration is key for the relationship between TUI and its partners

Use the TUI SpeakUp line as external whistleblower mechanism if needed. Link available [here](#).



How to file a complaint?

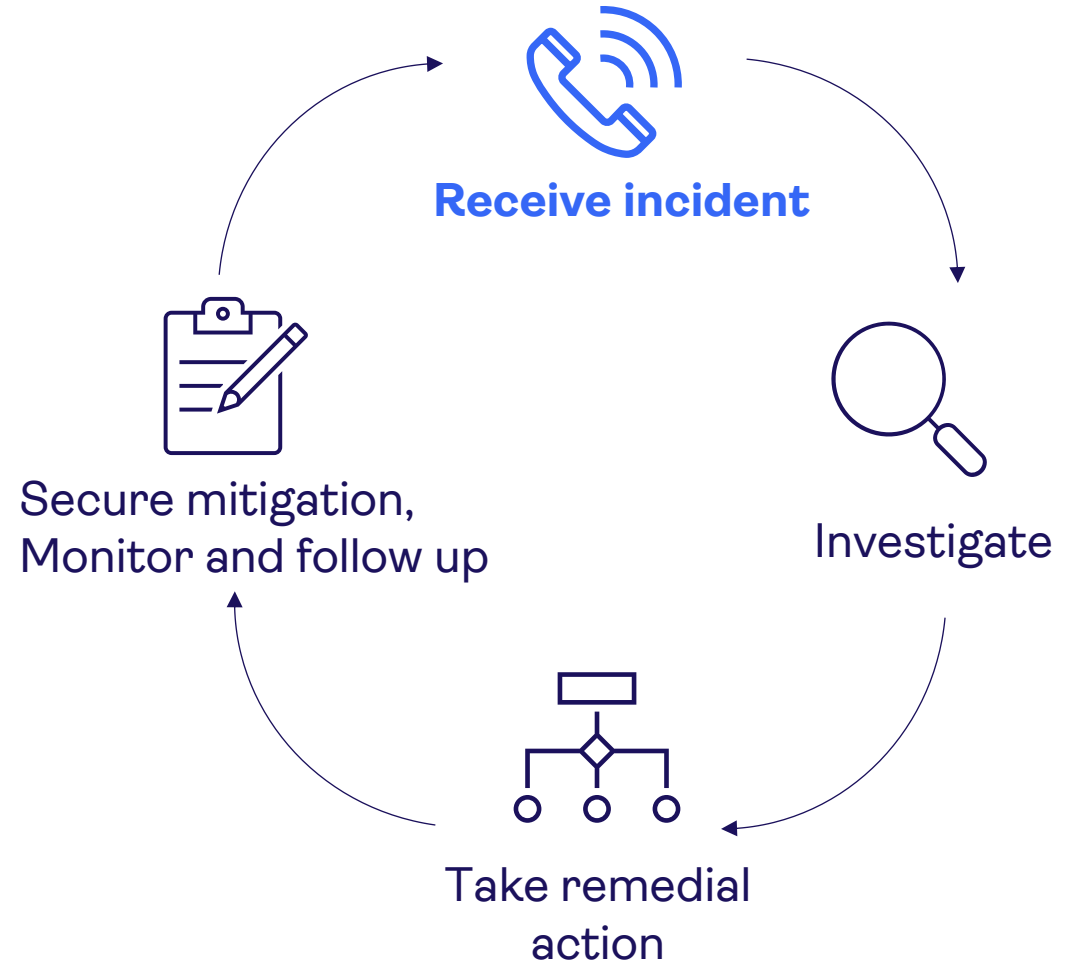
SpeakUp line – TUI's whistleblower system

We encourage our employees, business partners and anyone who has knowledge or is potentially affected by potential risks or violations of laws and policies **to speak up and raise their concerns**.

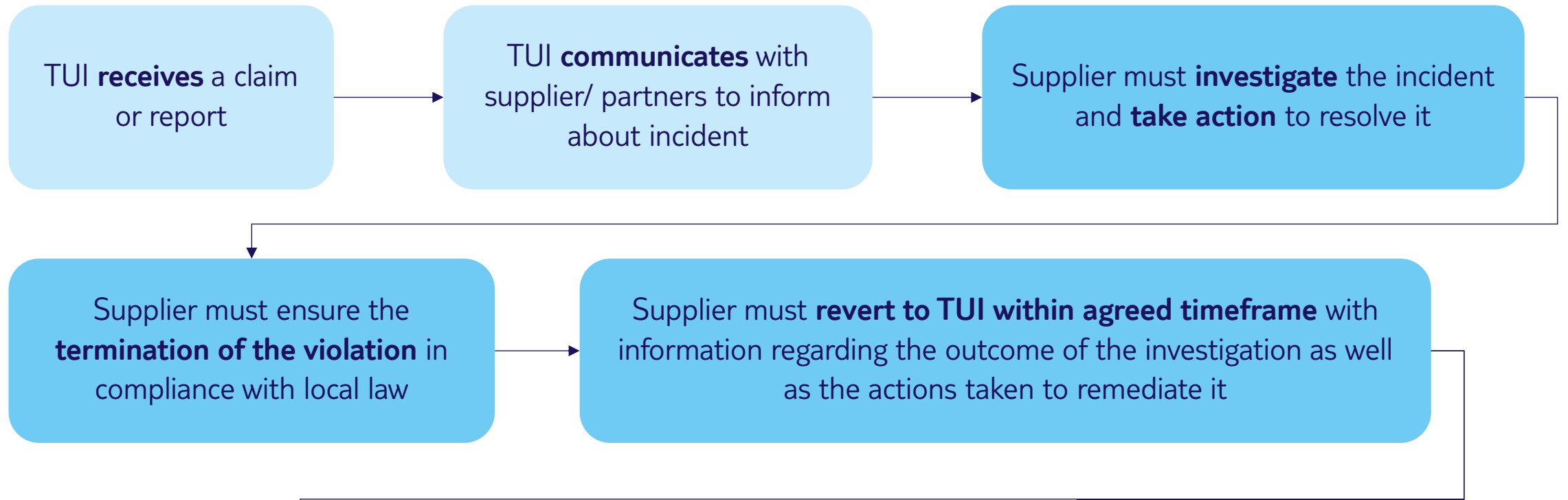
The **TUI Speak Up Line**, our whistle-blower system, is a **confidential channel to report concerns anonymously** to our Integrity & Compliance Team 365/24/7.

To raise a concern you can use the below links:

- Via web: Using this [link](#).
- Via phone: Our system supports multiple languages to ensure everyone can report concerns in their preferred language. Select the country and use the pointed phone number by using this [link](#).
- Mobile Accessibility: You can make reports directly from your mobile device, providing convenience and flexibility by scanning the QR Code or using this [link](#).



What to do in the event of an incident?



In the case that the **incident has been resolved** effectively, the collaboration can proceed as normal.

In the case that the **incident was not resolved**, TUI will follow the recommendations of the Supply Chain Act which, in the most extreme case, could lead to the termination of the contractual relationship. However, the **priority is to jointly decide on further action plans**.

German Supply Chain Act in summary

SCOPE:

Own business +
TUI suppliers +
TUI supply chain



OBJECTIVES

Protecting social and environmental standards

- Fair working conditions
- Prevention of forced labour, child labour and slavery
- Environmental obligations to protect human health

TUI respects human rights
and the environment



WHO

For companies with more than **1,000 employees in Germany**. Suppliers abroad are affected because German companies are obligated to fulfil human rights and environmental due diligence obligations **along their entire supply chain**.



WHAT STEPS IS TUI TAKING?

Key focus

- Risk analysis (TUI + supply chain) and risk management system
- Training concepts + preventive and remedial measures
- Policy development and annual reporting

WHAT TO DO IN CASE OF REPORTS?

If issues have been reported, partners are required to **investigate and mitigate** them together with TUI

**Key supply chain risks
&
guiding material**



Child labour

Manage and reduce risks

Definition

- Work that is mentally, physically, socially, or morally harmful to children.
- It **interferes with their education** by preventing school attendance or requiring children to combine school with excessively long and heavy work.
- Not all work performed by children under 18 is child labor. International standards set the **minimum age for work at 15 years** (14 in some countries).
- Children aged 15 and above can undertake general work as long as it is not hazardous and does not interfere with their education, health, safety, or morals.
- Child labour can **lead to slavery and sexual or economic exploitation**. In almost every case, it cuts children off from schooling and healthcare, restricting their fundamental rights and threatening their futures.

Examples for child labour in tourism

- **Souvenir selling and street trading:** Children working as street vendors selling souvenirs, food or small services such as shoe shining.
- **Children as guides:** In some tourist areas, children are employed as tourist guides, especially in remote or culturally significant places. These children guide tourists through historical sites or show local traditions.
- **Working in hotels and restaurants:** Children working in small hotels, guesthouses or restaurants in tourist areas. They clean rooms, serve food or work in the kitchen.
- **Entertainment:** Children perform in tourist centers as dancers, musicians or actors, often without adequate remuneration.
- **Prostitution and sexual exploitation:** One of the worst forms of child labour in tourism. In some countries, children are forced into the sex industry to service tourists.
- **Orphanage tourism:** Due to increasing demand, illegal orphanages have emerged, solely to make a profit. To fill these fake orphanages, children are sometimes taken from their families.





Child labour

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Conduct age verification:** Implement robust age verification processes during recruitment to ensure that all workers meet the legal working age requirements.
- **Policies:** Create clear policies that prohibit child labour, aligned with international standards and local laws. Ensure these policies are communicated effectively to all employees and stakeholders.
- **Training measures:** Provide regular training for employees, suppliers, and subcontractors on the risks and signs of child labour.
- **Reporting channels:** Establish confidential and safe channels for reporting suspected cases of child labour. Ensure that these channels are accessible to all workers and community members,
- **Remediate responsibly:** If child labour is found, take immediate and responsible actions to remove the child from work and provide support for their education and well-being.

TUI specific information

- [TUI Child Protection Guidelines](#)
 - Problem description
 - Industry solutions
 - TUI's approach
 - Further resources



- [Online Training TUI Care Foundation:](#)

Child Protection in Tourism:

- Impacts of tourism on child rights
- How tourism can affect children's lives
- Provides insights into protecting children and the advantages of doing so for your tourism business.



Child Protection in Tourism





Forced labour & modern slavery

Manage and reduce risks

Definition

- Forced labour refers to **any work or service** that individuals are **compelled to perform against their will**, typically under the threat of punishment.
- This form of exploitation can occur in various industries and often involves individuals being used for profit, sexual gratification, or other gains.
- **Modern slavery** is a **broader term** that encompasses forced labour, human trafficking, and other forms of exploitation where individuals **are controlled** and **exploited** for different purposes.
- It often involves coercion, threats, or deception to maintain individuals in servitude.

Examples for forced labour in tourism

- **Labour exploitation in hotels and resorts:** Workers in hotels and resorts could be employed under poor conditions. In those cases, they often come from poorer regions or countries and find themselves in situations where their passports are taken away and they are forced to work under pressure.
- **Construction of tourism infrastructure:** Forced labour can occur in the construction of hotels, airports and other tourism infrastructure. Workers involved in these projects often work in dangerous conditions, with little or no pay and without the opportunity to improve their working conditions.
- **Sexual exploitation in tourism:** Sexual exploitation of women and children in tourist centres is one of the worst forms of modern slavery and victims of this exploitation are often lured with false promises and then held in brothels or other facilities without the possibility of escape.
- **Human trafficking for forced labour:** Can involve migrants working in hotels, restaurants, construction sites or entertainment. They are often deceived and held in debt slavery or under duress.





Forced labour & modern slavery

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Raise awareness:** Educate employees, suppliers, and stakeholders about the signs of forced labour and modern slavery. Awareness campaigns and training sessions can help identify and prevent these practices.
- **Implement strong policies:** Develop and enforce policies that prohibit forced labour and modern slavery within your organization and supply chains.
- **Due diligence:** Regularly assess and monitor your supply chains to identify and mitigate risks of forced labour and modern slavery.
- **Collaborate with stakeholders:** Work with governments, NGOs, and other organizations to strengthen efforts against forced labour and modern slavery.

TUI specific information

- [TUI Human Rights and Modern Slavery Guidelines](#)
 - Definition of modern slavery and human trafficking
 - How to recognize forms of forced labour and modern slavery
 - TUI's approach
 - Dos and don'ts in risk situations of Modern Slavery

Further external information

- Roundtable on Human Rights in Tourism: [Modern Slavery](#)
- Preventing Human Trafficking: [An Action Framework for the Travel & Tourism Sector](#)





Health & safety

Manage and reduce risks

Definition

- Health and safety refers to the set of regulations, practices, and procedures designed **to prevent accidents, injuries, and illnesses** in the workplace.
- It involves creating and maintaining a safe and healthy environment for employees by identifying risks, implementing protective measures, and ensuring compliance with relevant laws and standards.
- This includes ensuring that physical, chemical and biological hazards are controlled, providing proper training and equipment, and promoting a culture of safety and well-being among employees and the public.
- The goal is **to create a safe and healthy environment** for everyone.

Examples for health & safety risks in tourism

- **Ergonomic impacts:** Employees in hotels and restaurants can be exposed to repetitive, physically demanding tasks.
- **Danger from chemical substances:** Employees in the cleaning and housekeeping sector are often exposed to chemical cleaning agents that can cause skin irritation, respiratory problems and other health impairments.
- **Stress and psychological strain:** During the peak seasons, the workload can be extremely high, which can lead to stress, exhaustion and burnout among employees.
- **Long working hours and shift work:** Long working hours and shift work, including night shifts, are common in the tourism industry. This can lead to sleep deprivation, chronic fatigue and accidents.
- **Dangers of outdoor activities and adventure tourism:** Employees who supervise outdoor activities are at risk of accidents and injuries.
- **Risks of infection:** Employees in tourism often have close contact with guests, which increases the risk of contracting infectious diseases.





Health & safety

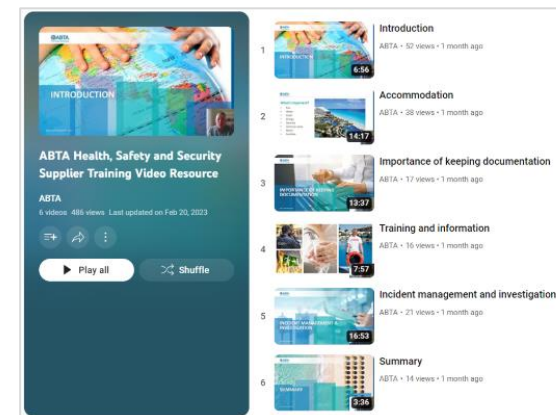
Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Safety-first culture:** Foster a workplace culture where safety is a top priority. Ensure that all employees understand the importance of safety and are committed to following safety protocols.
- **Regular risk assessments:** Regularly evaluate your workplace to identify potential hazards. This proactive approach helps in mitigating risks before they lead to accidents.
- **Training:** Provide ongoing safety training for all employees. This ensures that everyone is aware of the latest safety practices and knows how to handle emergencies.
- **Workplace ergonomics:** Design workstations and tasks to fit the physical capabilities of employees. This can help prevent injuries related to repetitive motions and poor posture.
- **Prepare for emergencies:** Develop and regularly update emergency response plans. Conduct drills to ensure that employees know how to respond in case of an emergency.

TUI specific information

- TUIpartners Website: [Health & Safety Guidance for accomodation providers](#)
- TUIpartners Website: [Health & Safety Guidance for Tours, Activities, Excursions and Transport providers](#)
- Overview of [TUI's safety partners](#)
- TUIpartners Website: [ABTA Health and Safety Training Videos](#)





Freedom of association

Manage and reduce risks

Definition

- Freedom of association in supply chains refers to the **right of all workers and employers to form and join organizations** of their own choosing, without prior authorization or interference from the government or each other.
- This right is crucial for ensuring that workers can **collectively advocate for their rights and interests**, leading to improved labor standards and ethical practices within supply chains.

Examples for freedom of association risks in tourism

- **Legal restrictions:** In some countries, laws either restrict or do not fully support the formation of independent trade unions. This can make it difficult for workers to organize and advocate for their rights.
- **Employer resistance:** Employers may oppose union activities, fearing that it could lead to increased labor costs or disruptions. This can be shown in various forms, such as intimidation, discrimination, or even dismissal of union members.
- **Uncertain employment:** Temporary, contracts can undermine efforts to organize workers. These workers often lack job security and may fear retaliation if they attempt to join or form a union.
- **Lack of awareness and education:** Workers may not be fully aware of their rights or how to exercise them. Additionally, there may be a lack of training and resources to support effective union activities.
- **Cultural barriers:** In certain cultures, there may be a lack of tradition or acceptance of unionization, making it harder to establish and maintain unions.





Freedom of association

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Engaging with governments:** Advocate for stronger legal protections for workers' rights can help create a more supportive environment for freedom of association.
- **Capacity building:** Providing training to workers about their rights and responsibilities can empower them to effectively exercise and support freedom of association.
- **Corporate commitment:** Companies can adopt and enforce policies that explicitly support freedom of association. This includes integrating these commitments into their codes of conduct, supplier agreements, and monitoring systems.
- **Worker empowerment:** Supporting the formation of worker committees or other representative bodies can help workers organize and advocate for their rights.
- **Collaborative efforts:** Partnering with NGOs, trade unions, and other stakeholders can amplify efforts to promote freedom of association. These collaborations can provide additional resources and expertise.

Further external information

- United Nations: [Freedom of assembly and of association](#)
- International Labour Organization: [Freedom of association](#)
- UN Global Compact: [Labour](#)





Unequal treatment in employment

Manage and reduce risks

Definition

- Unequal treatment in employment refers to **the unfair or discriminatory treatment of employees or job applicants** based on factors such as race, gender, age, religion, disability, or other protected characteristics, rather than on their qualifications or job performance.
- This can manifest in **hiring, promotion, pay, benefits, or workplace conditions.**

Examples for unequal treatment in tourism

- **Hiring discrimination:** A hotel could only hire staff who fit a specific appearance, despite equally qualified applicants from different backgrounds.
- **Unequal pay:** Tour guides or hospitality staff could be paid less based on gender, with male employees earning more than female employees for the same job.
- **Promotion bias:** Men being promoted to managerial positions in a travel agency more frequently than women, even when women have equal or better qualifications and experience.
- **Unfair scheduling:** Certain employees being consistently assigned more desirable shifts or locations based on favoritism or ethnicity, while others are given less favorable hours or tasks.
- **Disability discrimination:** A tour company refusing to hire individuals with disabilities, even when reasonable accommodations can be made for them to perform their jobs effectively.
- **Cultural or religious bias:** Not allowing employees to observe religious holidays or wear specific attire that aligns with their religious beliefs.





Unequal treatment in employment

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Ensure equal opportunities:** Implement policies and practices that promote equal opportunities for all employees, regardless of their background, e.g. fair hiring practices and equal pay for equal work.
- **Conduct regular audits:** Regularly audit your employment practices to identify and address any instances of unequal treatment. This can involve reviewing hiring data or pay scales.
- **Provide training measures:** Offer training programs for employees and management on anti-discrimination and equal treatment.
- **Establish grievance mechanisms:** Set up clear and accessible grievance mechanisms for employees to report any instances of unequal treatment. Ensure confidentiality and prompt and fair handling of the reports.
- **Collaborate with local organizations:** Work with local organizations and NGOs that focus on labor rights and equality to gain insights and support in promoting fair employment practices.

TUI specific information

- [Online Trainings TUI Care Foundation:](#)
 - Women's Rights & Gender Equality in Tourism
 - Decent Work Conditions in Tourism



Women's Rights & Gender Equality in Tourism



Decent Work Conditions in Tourism





Adequate living wage

Manage and reduce risks

Definition

- While many countries have a **"minimum wage"** system, which sets the lowest legal salary, **this amount often falls short of covering essential living expenses** like rent, food, and clothing. That's why the concept of a "living wage" is important.
- A living wage is **the income necessary to meet basic needs** such as food, housing, transportation, healthcare, and other essentials, while **also allowing for a decent quality of life**.
- The idea behind a living wage is that full-time work should provide enough income to support yourself and your family comfortably, without financial strain, and still allow for savings to cover unexpected expenses, such as home repairs or school supplies for children.

Examples for living wage risks in tourism

- **Seasonal work:** The tourism industry, being highly seasonal, creates numerous casual and part-time jobs. During peak seasons workers can frequently endure long hours without extra compensation, while in the off-season, their earnings drop significantly or disappear altogether.
- **Aviation sector:** Particularly with budget airlines, cabin crew and pilots can face low wages. Some are paid hourly and may struggle to meet minimum wage requirements, depending on their working hours and season.
- **Uncertain contracts:** Hotels and other accommodation providers frequently employ seasonal staff under contracts that lack social protection and health insurance.
- **Local travel agencies:** May hire tour guides and activity providers who earn low wages, have unstable employment, and heavily depend on tips.





Adequate living wage

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Conduct wage assessments:** Regularly evaluate the wages paid to ensure they meet or exceed the local living wage standards. This includes considering the cost of living in the areas where you operate.
- **Implement fair wage policies:** Develop and enforce policies that guarantee fair wages for all workers, including subcontractors. Ensure these policies are clearly communicated and understood by all employees and suppliers.
- **Engage in collective bargaining:** Support and respect the right of workers to engage in collective bargaining through unions or worker committees. This helps in negotiating fair wages and improving working conditions.
- **Monitor and adjust:** Continuously monitor wage levels and adjust them as needed to reflect changes in living costs and inflation. Use data from reputable sources to inform these adjustments and ensure wages remain adequate.

Further external information

- [Global Living Wage Coalition](#)
- [Living Wage Information Video](#)
- [Roadmap on Living Wages:](#) A platform to secure living wages in supply chains
- [Setting Adequate Wages Project](#) – International Labour Organization





Severe environmental damage

Manage and reduce risks

Definition

- Severe environmental damage refers to **significant harm caused to the natural environment**, which can include the destruction of ecosystems, loss of biodiversity, pollution of air, water, and soil, and long-term negative impacts on human health and wildlife.
- This type of damage often results from activities like industrial pollution, deforestation, and climate change.
- **Severe environmental damage in tourism** refers to significant and often irreversible harm caused to natural environments due to tourism-related activities. This damage can manifest in various forms, including **destruction of natural habitats, overuse of resources and ecosystem disruption**.

Examples for severe environmental damage in tourism

- **Deforestation:** Building resorts, hotels, and other tourist facilities can require clearing large areas of forest. This deforestation can lead to habitat loss for wildlife, soil erosion, and a decrease in biodiversity.
- **Water Pollution:** Tourism can contribute to water pollution through the discharge of untreated sewage or plastic waste. This pollution affects marine life and can make water unsafe for both wildlife and humans.
- **Waste:** Tourism can generate large amounts of waste, including plastic bottles or food packaging. Especially the use of single-use plastics by hotels or cruise ships can result in negative environmental impacts. Improper waste management can lead to littering, pollution of natural areas, and harm to wildlife.
- **Coral Reef Destruction:** Tourist activities like snorkeling, diving, and boating can damage delicate coral reefs.





Severe environmental damage

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Environmental impact assessments (EIA):** Before starting any new project/activity, conduct a comprehensive EIA to identify potential environmental risks and develop mitigation strategies.
- **Eco-friendly technologies:** Invest in and utilize eco-friendly technologies and practices, such as renewable energy sources, water-saving devices, and sustainable waste management systems.
- **Collaboration:** Engage with environmental experts and organizations to gain insights and guidance on best practices for minimizing environmental impact.
- **Monitoring and reporting systems:** Establish robust monitoring and reporting systems to track environmental performance. Regularly report findings to relevant authorities and stakeholders.
- **Training and awareness programs:** Conduct regular employee trainings and awareness programs on the importance of environmental protection.

TUI specific information

- [Online Trainings TUI Care Foundation:](#)
 - Energy Efficiency in Hospitality
 - Water Management in Hospitality
 - Waste Management & Circular Economy in Hospitality



Energy Efficiency in Hospitality



Water Management in Hospitality



Waste Management & Circular Economy in Hospitality

- [TUI Green Building Guidelines](#)
- TUI partners Website:
 - [Energy & water use](#)
 - [Reducing & recycling waste](#)
 - [Nature & wildlife](#)





Unlawful taking of land, forests and water

Manage and reduce risks

Definition

- The unlawful taking of land, forests, and water refers to the **illegal acquisition or seizure of these resources without proper authorization or consent**. This can include:
 - **Land grabbing:** The illegal or forceful acquisition of land, often displacing local communities + violating their rights.
 - **Deforestation:** The unauthorized clearing of forests, which can lead to environmental degradation and loss of biodiversity.
 - **Water theft:** The illegal diversion or extraction of water resources, impacting local ecosystems and communities dependent on these water sources.
- These actions **often violate human rights**, including the rights to adequate housing, food, water, and a healthy environment.
- They can **lead to significant social, economic, and environmental consequences**, affecting the livelihoods and well-being of affected communities.

Examples for unequal treatment in tourism

- **Land grabbing for resorts:** In some countries, large tracts of land have been illegally acquired to build hotels and resorts. This can involve displacing local communities without proper compensation or consent.
- **Deforestation for tourism infrastructure:** In some regions illegal logging and deforestation have occurred to clear land for hotels and other tourism-related infrastructure. This cannot only destroy vital ecosystems but also violates environmental regulations.
- **Water diversion for tourist facilities:** In some tourist destinations, water resources are illegally diverted to supply hotels, swimming pools, or golf courses. This can lead to water shortages for local communities and agriculture.





Unlawful taking of land, forests and water

Supporting information to mitigate the risk in the supply chain

Guidance to overcome challenges

- **Risk assessments:** Regularly evaluate your own supply chain to pinpoint where land, forest, and water use may be unlawful. Conduct on-site visits and audits, engaging local environmental experts to ensure compliance with legal and ethical standards.
- **Sustainable practices:** Shift towards sustainable resources by adopting eco-friendly products and technologies. For instance, invest in water-efficient systems or forest stewardship certifications to minimize environmental impact.
- **Engage with local communities:** Work directly with local communities to gain their trust and support. Before any new venture, ensure you have their consent by holding town hall meetings and collaborating on projects that benefit both the community and your business.

Further external information

- United Nations Human Rights: [Land and Human Rights: Standards and Applications](#)
- Roundtable Human Rights in Tourism: [Community Impact](#)



Any questions?

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