

eDreams ODIGEO S.A.
(The "Company")

Responsible Business Conduct (UK MSA)

eDreams ODIGEO S.A

Registered office: Calle Lopez de Hoyos 35,
28002, Madrid

Responsible Business Conduct

This statement sets out the steps that eDreams ODIGEO, S.A., as the holding company of Opodo Ltd and the eDreams ODIGEO Group (hereinafter, the "Group"), have taken to ensure that slavery and human trafficking is not taking place in any of our supply chains or part of our business.

Overarching statement

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole. As an organisation we endeavour to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains.

Meaning of slavery and human trafficking

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights (Articles 23 & 24) relating to labour conditions.

Our business

Opodo Ltd is part of the eDreams ODIGEO Group, one of the world's largest online travel companies and one of the largest publicly traded European e-commerce companies, with more than 17 million customers in 45 countries worldwide. The eDreams ODIGEO Group consists of five well-known brands; Opodo, Go Voyages, eDreams, Travellink and Liligo, and offers access to regular flights, low-cost airlines, hotels, cruises, car rental, dynamic packages, holiday packages and travel insurance to make travel easier, more accessible, and better value to its clients.

Our supply chains

We work closely with aggregators, airlines, tour operators, hotels, car rental companies and destination services supply partners. In addition to our content suppliers, the Group also has outsourced contact centres located in Morocco, India, China, Colombia, Spain, Egypt, Senegal, Brazil, Portugal and Poland, and an outsourced back office support functions in Colombia and Peru.

Relevant policies

We are committed to respecting and promoting human rights, and the interests of those our activities may impact. We respect the human rights of all our stakeholders, seek to avoid infringing these rights, and work to address any adverse human rights impacts we may be involved with.

Internationally Recognized Standards:

Our commitment to respect and promote human rights is based on the following internationally recognized standards and principles, which also serve to inform and guide our human rights commitments:

- Universal Declaration of Human Rights;
- UN Guiding Principles on Business and Human Rights;
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work;
- OECD Guidelines for Multinational Enterprises.

Robust corporate governance and strict adherence to the rule of law are fundamental drivers of corporate responsibility and sustainable development. Both are vitally important to ensuring human rights are respected and to reliable enforcement of labour and environmental laws.

eDreams ODIGEO firmly supports public policies and laws that promote travel and open borders while protecting human rights, and we expect our business partners to apply similar standards of corporate conduct and respect for human rights.

In keeping with our commitment to act with integrity in all our business dealings, some relevant Group policies contain specific sections referring to the need to ensure that there is no slavery or human trafficking in any part of our business or our supply chains. Our relevant policies, available on our corporate website, include:

- Group Business Code of Conduct
- Business Ethics Principles for Suppliers
- Group Procurement & Outsourcing Policy

Our **Group Business Code of Conduct** is available in seven (7) different languages covering the countries where we have physical offices. It sets out the behaviours we expect from our employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. Our employees are provided with the Business Code of Conduct as part of the onboarding process, periodic refresher communications are sent out, supplemented by online compliance training. All of our employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Business Code of Conduct. Relevant sections within the Policy include:

***Article 3 - Diversity and Inclusion:** "eDreams ODIGEO operates its business with integrity and honesty, promoting equal employment opportunities, with zero tolerance for all types of discriminatory practices (including age, disability, ethnic origin, family status, race, religion, gender, sexual orientation and social origin), and harassment (sexual, physical or verbal). We pride ourselves in having a diverse and inclusive workplace where each employee is expected to treat others with dignity, courtesy and respect. We are committed to respecting and promoting human rights, and the interests of those our activities can affect; we respect the human rights of our employees and stakeholders by seeking to avoid infringing on their rights and by working to address adverse human rights impacts with which we are involved."*

Our commitment is based on internationally recognized standards and principles, in particular the United Nations (UN) Guiding Principles on Business and Human Rights. eDreams ODIGEO expects its business partners to apply similar standards of corporate conduct. We promote meritocracy and select and recruit solely on the basis of the qualifications, experience, and skills required for the job to be performed. Internally, the Company has adopted a Plan for Equal Opportunities and a Harassment Protocol that provide to employees guidelines and action items to be followed for these matters. "

***Article 12 - Working Environment & Wellbeing:** "We respect and promote international human rights and not only are fully committed to providing our employees with a safe working environment in accordance with internationally recognized standards, but also expect this of our business partners. We commit to respect local country minimum wage limits and guarantee that working hours and working conditions comply with local laws and regulations."*

We do not accept Child labour and support the United Nations Convention on the Rights of the Child (1989) as well as the International Labour Organisation Minimum Age Convention n° 138 (1973) which provides that the minimum employment age for employment should not be less than the compulsory schooling age of the country in which the individual is employed and in any case, not less than 15 years (except for certain developing countries, where a minimum age of 14 years may be applied).

We do not accept any form of forced or compulsory labour and support the International Labour Organisation Forced Labour Convention (Nº. 29) and the Abolition of Forced Labour Convention (Nº. 105): accordingly, we will not enter into business relationships with any party that does not comply with this principle of conduct. We work together with mutual respect and trust, where everyone has a voice, and feels responsible for the performance and the reputation of our business.

We believe in professional and personal development and facilitate this via our multiple training channels, and equal opportunities for internal transfers.

All of our employees have the right to work in an environment where they are respected, safe and secure. We expect all employees to respect this right and to act professionally. All employees should

be aware of and respect the diversity of viewpoints, beliefs and values of all of our colleagues. Respect for employee's wellbeing includes our commitment to a safe workplace.

We respect the freedom of association rights of our employees and other stakeholders; the right to representation by bona fide trade unions and other bona fide representatives of employees, and are committed to adhering to standards of employment and industrial relations, and local equality regulations, in all countries in which we operate.

We do not rely on non-regular employment as this does not align with our philosophy of stimulating, developing, and retaining our talent, within a quality and secure work environment, based on permanent contracts.

The **Business Ethics Principles for Suppliers** is an abridged summary of the Code of Conduct that we share with suppliers when starting a relationship with them.

Our **Group Procurement & Outsourcing Policy** has a specific section referring to the due diligence steps that should be followed during the supplier selection policy to ensure that the supplier is not in contravention of the UK Modern Slavery Act. The relevant sections state:

Selection of Suppliers: *"Human Rights & Modern Slavery: The supplier selection process shall prioritise suppliers who maintain policies that respect basic human rights and dignity, without distinction on any basis, including the rights to life, liberty, and security of person, freedom from slavery and cruelty, and equal protection under relevant laws and constitutions. Any supplier with a negative track record in the aforementioned areas should be excluded from the preselection process."*

Supplier Credit Checks & Additional Due Diligence Considerations: *"Assessment of supplier risk in relation to human rights and modern slavery should take into consideration at minimum the following factors:*

- *Geographical risk indices pertaining to human rights,*
- *Level of supply chain control exercised by the Group,*
- *External governance factors,*
- *Levels of political stability in the country the supplier is based,*
- *Supplier history of penalties, fines, and negative publicity".*

Supplier Certifications

We have obtained positive affirmation certifications from all our relevant suppliers, (our existing contact centre suppliers based in Morocco, India, China, Colombia, Spain, Egypt, Senegal, Brazil, Portugal, Poland and our outsourced back office support functions in Colombia and Peru), confirming their commitment to compliance with the Modern Slavery Act, adherence to internationally recognized human and employee rights, the prohibition of child labour and forced labour, observing and promoting ethical business conduct, adherence to legal standards and environmental rules, as well as preventive environmental protection (based on the UN Global Compact's Ten Principles).

Violations

Opodo Ltd and all Group subsidiaries have a zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking.

Training

The Group recognizes the need for continual improvement and adaptation of onboarding material and training to ensure that all relevant employees are kept up to date and fully aware of changes to legislation and regulation in critical areas.

All employees receive the Business Code of Conduct in which specific reference is made to the protection of human rights and rejection of modern slavery. This is supplemented with an online

compliance training program within which there is a specific course dedicated to Business Ethics and the Code of Conduct.

Speak up channel

Our comprehensive guidelines for speaking up and addressing ethical concerns are thoroughly outlined in the eDreams ODIGEO Speak up Policy.

Enforcement

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Opodo Ltd and all eDreams ODIGEO Group subsidiaries for the financial year ending 31st March 2024.

Opodo Ltd:

Director Name: David Elizaga Corrales

Date: 13th May, 2024



Vacaciones eDreams S.L:

Director Name: David Elizaga Corrales

Date: 13th May, 2024



eDreams ODIGEO S.A.:

Director Name: David Elizaga Corrales

Date: 13th May, 2024

