

Responsible Business Conduct

This statement sets out the steps that we Opodo Ltd and Group Subsidiaries 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 organization we endeavor 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, the world's largest online travel company in the flight sector and the largest publicly traded European e-commerce company by profitability, with more than 16 million customers in 44 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, charters, low-cost airlines, hotels, cruises, car rentals, cruises, holiday packages and travel insurance 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 centers located in Morocco and India.

Relevant policies

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 include:

- Business Code of Conduct
- Group Procurement Policy
- Third Party Outsourced Suppliers Policy

Our **Group Business Code of Conduct** is available in five (5) 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 and periodic refresher communications are sent out. 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:

Section 3 - Business Conduct: *“We operate our business as good corporate citizens, with integrity and honesty, and with respect for the human rights and the interests of those our activities can affect. We expect our business partners to apply similar standards of corporate conduct”*

Section 12 - Employees: *“We will respect the right of our employees to be represented by bona fide trade unions and other bona fide representatives of employees. We will in all countries observe standards of employment and industrial relations not less favorable than those observed by comparable employers in such countries adhering to all local equality regulations. We will not use child labor or any other form of forced or compulsory labor, and will not enter into business relationships with any party that does not comply with this principle of conduct.”*

Our **Group Procurement Policy** and the **Group Significant Outsourced Suppliers Policy** have 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. (Effective March 2016). The relevant sections state:

Selection of Suppliers: *“The supplier selection process should prioritize 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 pre-selection process.”*

Supplier Credit Checks & Due Diligence: *“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

Our existing contact center suppliers based in Morocco and India have obtained positive affirmation certifications confirming their commitment to compliance with the Modern Slavery Act, adherence to internationally recognized human and employee rights, the prohibition of child labor and forced labor, 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.

Currently all new employees receive a copy of the Business Code of Conduct in which specific reference is made to the protection of human rights and rejection of modern slavery. Going forward, the Group intends to supplement this with periodic training commencing with key employees involved in Procurement and the engagement of suppliers.