

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

# Responsible Business Conduct (UK MSA)

eDreams ODIGEO S.A

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

**eDreams ODIGEO**

## Responsible Business Conduct

This statement sets out the steps that, 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 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, the world's largest online travel company in the flight sector, 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 Ligo, 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

Our main supply chain relates to the content we offer. We work closely with aggregators, airlines, tour operators, hotels, car rental companies and destination services supply partners. In addition to our content suppliers, other main groups of suppliers include: cloud and technology service providers, outsourced contact centres located in Morocco, India, China, Colombia, Spain, and Egypt, outsourced function suppliers, and payment & collection related suppliers.

### Relevant policies

In keeping with our commitment to act with integrity in all our business dealings, we have relevant Group policies that 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, and include:

- a) Group Business Code of Conduct
- b) Business Ethics Principles for Suppliers
- c) Group Procurement & Outsourcing Policy

- a) **Our Group Business Code of Conduct** is available in five (5) different languages and is designed to provide a frame of reference for the expected conduct and actions of eDreams ODIGEO's employees and stakeholders, in their daily decision-making and in their relationship with others. 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 & INCLUSION***

*"eDreams ODIGEO operates its business with integrity and honesty, promoting equal employment opportunities, with zero tolerance for all types of discriminatory practices, including 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 its 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...."*

**\* ARTICLE 12. WORKING ENVIRONMENT AND WELL-BEING**

*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 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...."*

- b) **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.
- c) **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. (Effective March 2016). The relevant sections state:

*\* Selection of Suppliers: "Human Rights & Modern Slavery: The supplier selection process shall 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 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"*

The external facing policies such as our Business Code of Conduct and Business Ethics Principles for Suppliers are available on our Corporate Web (<https://www.edreamsodigeo.com/corporate-policies/>).

## 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, and Egypt, and our outsourced accounting service supplier Everis 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 on boarding material and training to ensure that all 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.

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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 31<sup>st</sup> March 2021.

**Opodo Ltd:**

Director Name: David Elizaga Corrales

Date: 30<sup>th</sup> April, 2021



**eDreams ODIGEO SA:**

Director Name: David Elizaga Corrales

Date: 30<sup>th</sup> April, 2021

