

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 part of our supply chain or 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 chain.

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 leading travel subscription platform, one of the world's largest online travel companies, and one of the largest publicly traded European e-commerce companies. 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, Spain, Romania, Egypt, Senegal, Portugal, and Poland, and outsourced back office support functions in Spain, Colombia, and Peru.

Relevant policies

We recognize that operating in diverse global regions presents varying levels of risk. We conduct periodic risk assessments of our supply chain, focusing on sectors and geographic regions known for higher risks of forced labour to ensure our due diligence is prioritized effectively. 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, a number of 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 chain. Relevant policies, available on our corporate website <https://investors.edreamsodigeo.com/English/governance/rules-and-policies/default.aspx>, include:

- Group Business Code of Conduct
- Business Ethics Principles for Suppliers
- Corporate Social Responsibility Policy
- 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 eDOers in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. Our eDOers 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 eDOers and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Business Code of Conduct.

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.

The **Corporate Social Responsibility Policy** designed to promote a culture of sustainability and social responsibility across the Group, and serving as the foundation stone of our focused Environmental, Social and Governance (ESG) agenda.

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.

Supplier Certifications

We have obtained positive affirmation certifications from all our relevant suppliers (our existing contact centre suppliers based in Morocco, India, China, Spain, Romania, Egypt, Senegal, Portugal, and Poland, and outsourced back office support functions in Spain, 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):

- **Human Rights & Labour Standards:** Ensuring that employee working conditions and remuneration are aligned with the principles set out in the Universal Declaration of Human Rights.
- **Respect & Dignity:** Treating people with respect and dignity, promoting equal opportunities, and sharing eDreams ODIGEO's commitment to human rights in accordance with international standards.
- **Modern Slavery Prevention:** Maintaining rigorous mechanisms and processes throughout our operations to prevent child labour, forced labour, modern slavery, and human trafficking.
- **Fair Compensation:** Paying fair wages and benefits that meet or exceed local labour laws or international labour standards.
- **Working Hours:** Complying with all local laws and regulations relating to working hours, overtime, and rest periods.

- **Comprehensive Non-Discrimination:** Not engaging in discriminatory practices of any kind, including but not limited to age, disability, ethnic or national origin, family or marital status, race, religion or belief, gender, gender identity or expression, sexual orientation, socio-economic background, genetic information, or any other characteristic protected by applicable law.
- **Health & Safety:** Providing a safe working environment and adhering to health and safety standards that protect workers from hazards.
- **Wellbeing:** Providing support mechanisms for workers' physical and mental health, promoting a healthy work-life balance, and employee wellbeing.
- **Freedom of Association:** Respecting employees' right to freedom of association and collective bargaining without fear of harassment or penalty.
- **Anti-Corruption:** Working against corruption in all its forms, including extortion and bribery.
- **Transparency & Accountability:** Committing to transparency across all business operations, labour practices, environmental impacts, and human rights issues.
- **Supply Chain Responsibility:** Communicating these expectations to our own supply chain and taking reasonable steps to ensure their compliance with these same standards.
- **Environment:** Implementing environmentally friendly technologies and practices where possible.
- **Training:** Providing regular training on human rights, ethics, diversity, equality, health and safety, data privacy, and cybersecurity.
- **Grievance Mechanisms:** Providing workers with secure mechanisms to raise concerns or grievances without fear of retaliation.

In FY26, our certification process achieved a 100% positive affirmation rate from relevant suppliers. To move beyond a reliance on self-reporting, we supplemented these certifications with an independent five-year adverse-media audit (concluding September 2025). This proactive search cross-references supplier declarations against public records to identify any historical human rights issues. We have concluded that eDreams ODIGEO has not been exposed to any material human rights violations within its supply chain during this reporting period.

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 eDOers are kept up to date and fully aware of changes to legislation and regulation in critical areas.

All eDOers 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.

Reporting channel

Our comprehensive guidelines for speaking up and addressing ethical concerns are thoroughly outlined in the eDreams ODIGEO Reporting Ethical and Compliance-related Concerns Policy. During FY26, no incidents of modern slavery were reported through our channels.

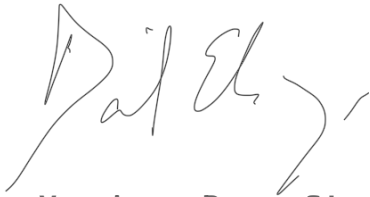
Enforcement

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 2026.

Opodo Ltd:

Director Name: David Elizaga Corrales

Date: 30th April, 2026

**Vacaciones eDreams S.L:**

Director Name: David Elizaga Corrales

Date: 30th April, 2026

eDreams ODIGEO S.A.:

Director Name: David Elizaga Corrales

Date: 30th April, 2026