

eDreams ODIGEO

Reporting Ethical and Compliance-related Concerns Policy

The eDO Values are intrinsic to the success of our Group Policies



We fly high – We expect from each one of us a commitment to act in accordance with the highest standards of ethical business principles. At eDO, we value integrity, honesty, transparency, respect, trust and professionalism in our daily operations and relationships.



We set the path – Our reputation is built on and affected by the decisions and actions we take. Each one of us should be an example to our fellow eDOers in following Group Policies.



We Journey Together – Compliance with Group Policies is a collective responsibility of our diverse team, and we should be ready to help fellow eDOers in understanding, interpreting, and adhering to Group Policies, and resolving any doubts.



We explore, grow, and discover – As a Company we are committed to continually improving and adapting our Group Policies, to ensure that we are up to date with all legal, regulatory, compliance and ethical standards.

Owner: Compliance Committee

Approved by: Chief Executive Officer

In keeping with our core values *#we fly high*, *#we journey together*, *#we set the path* and *#we explore, grow and discover*, eDreams ODIGEO (“**eDO**”) encourages and is committed to facilitating a healthy, open culture where eDO stakeholders can feel comfortable and empowered to raise concerns they may have relating to ethical issues or misconduct relating to eDO, without fear of retaliation or adverse consequences.

eDO values the cooperation of stakeholders who identify and report any suspected misconduct: reporting gives eDO the opportunity to act with integrity and responsibility, and address the issues timely.

1. What is the purpose of this policy?

The purpose of the Reporting Ethical & Compliance Related Concerns Policy (the “**Policy**”) is to:

- clarify how eDO Stakeholders can raise concerns regarding a suspected misconduct that could affect eDO,
- describe the process that will be applied regarding the investigation and treatment of the concern by eDO.

Particular focus is given regarding the process regulating concerns reported through the Ethical & Compliance Related Concerns Reporting Platform (the “**Reporting Platform**”, described in Section 4) established in accordance with the applicable European regulation¹.

2. Who can Report?

All employees (including temporary employees and trainees) as well as Board members, investors, contractors, business partners, former employees, job candidates, volunteers and any other person or organisation representing eDO’s interest (referred to collectively as “**eDO Stakeholders**” throughout the Policy), who reasonably believe that a misconduct has occurred or is likely to occur, can raise concerns via the Reporting Channels described in Section 4.

The individual reporting a concern in good faith will be referred to as the “**Reporter**” throughout the Policy.

The protection guaranteed in this Policy applies to all Reporters who reported a concern in good faith, as well as the eDO Stakeholders contributing to the investigation.

3. What can be reported?

eDreams ODIGEO encourages all Reporters to raise a concern if they have a genuine suspicion that the reported matter raises legal and/or compliance risks for eDO.

¹Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and relevant national transposition laws.

Concerns that can be reported include:

- Fraud, theft or other economic, business or financial crimes,
- Money laundering, terrorist financing or other violation of payment business laws,
- Corporate tax,
- Corruption and bribery,
- Human rights, discrimination or harassment,
- Forgery or alteration of any documents belonging to eDO,
- Market abuse, manipulation or insider trading,
- Competition law and international sanctions against countries, entities or individuals,
- Conflicts of interest,
- Abuse of position or misuse of information,
- Allegations that could cause serious harm to the reputation or finances of eDO,
- Clarification requests of any eDO Policies,
- Violations of any eDO Policies.

Please make sure you frame your concern against one of the aforementioned categories.

This Policy and related channels are **not** to be used for the following topics, as there are dedicated expert interlocutors within eDO to manage them:

- **Commercial concerns** linked to a booking or a subscription should be sent to [Customer Service](#);
- **Personal employment-related concerns** relating to remuneration and employment conditions should be addressed to the Human Resources team;
- **Exercise of customers' data protection rights over their personal data** (information, access, rectification, erasure or forgetting, cancellation or opposition, restriction of processing, portability, etc.) should be managed via the [Privacy Web Form](#);
- **IT & Cybersecurity**: please contact the securityoffice@edreamsodigeo.com;
- **Personal data breaches**: please contact the securityoffice@edreamsodigeo.com;
- **Investors' queries** will be addressed by our dedicated team via investors@edreamsodigeo.com.

4. Where and when can a concern be reported?

Reporters are encouraged to raise their concerns through the available channels (collectively referred to as the "**Reporting Channels**" for the purpose of this Policy), choosing the most convenient option for them.

As a general guideline, the Reporting Channels do not replace eDO's regular reporting lines or ongoing feedback culture. If an employee has a doubt or suspects a breach, they are encouraged to address this directly with the person involved or, if not appropriate, with the internal reporting contacts detailed below:

- **Internal reporting contacts: Whenever possible, Reporters that are employees are encouraged to raise any concern with their line manager, with the People team, or with**

the Legal team where appropriate. Employees can also contact the Compliance Committee directly through its email address. These internal points of contact have been entrusted by eDO with providing insightful solutions to business concerns, in an efficient manner.

- **The "Reporting Platform":** If the direct internal reporting contacts are not appropriate, the Reporting Platform, (available under the link: <https://report.whistleb.com/en/edreams>), is a dedicated reporting tool open to both internal and external Stakeholders of eDO, facilitating anonymous reporting and ensuring the protection rights and guarantees detailed in Section 5 below.
- **External reporting channel:** as per the European regulation, if it feels appropriate, breaches of regulations may be reported to national authorities "*competent to receive, give feedback and follow up on reports*".

If preferred, the Reporter may request via the aforementioned channels a face-to-face meeting, video conference, or phone call in addition or as an alternative to written communication.

Whether reporting a concern in person, in writing or orally, the Reporter is encouraged to provide as much detailed information as possible to enable eDO to assess and investigate the case.

Key information to be provided includes: (i) the background, history and reason for the concern (ii) names, dates, places and other relevant information (iii) any documents that may support the concern. All these elements will be treated with confidentiality.

Reporting a concern can be made at any time, meaning that there is no time prescription. However, Reporters are encouraged to report as soon as possible, even if they do not have all the facts: it is safer to report a concern before a situation gets out of hand or the damage escalates.

5. What protection measures are guaranteed for Reporters?

A - Confidentiality

The recipients of the concerns reported via the Reporting Channels (line manager, HR team, Legal team, Compliance Committee members as the case may be) are bound by a duty of confidentiality, to protect the identity of the Reporter at all stages of the process and in compliance with applicable legal requirements. Therefore, all concerns made will be handled with full respect of confidentiality principles.

Details of the concern and of the investigation will not be revealed or discussed with anyone other than the persons (internal or external) who have a strict legitimate interest in the information for performing the investigation or assuming related professional duties.

A strict exception to this confidentiality may be if it is required by law.

B - Anonymity

eDO acknowledges reporting may not be easy.

Therefore, in line with European requirements, the Reporting Platform has been designed to offer an anonymous option to facilitate the report of concerns for cases where the Reporter may feel uncomfortable disclosing their identity.

C - An in-depth investigation by an impartial person/department

Any concern reported by a line manager or HR to the Compliance Committee as well as any concerns reported directly through the Reporting Platform will be diligently investigated by the Compliance Committee.

The Compliance Committee is a cross functional body designated by eDO to manage the Reporting Policy process, review all allegations of misconduct reported through the Reporting Channels, follow-up on reports and supervise investigations.

Depending on the case, the Compliance Committee may arrange a confidential meeting with the Reporter to gather additional information and clarifications. It may also rely upon the expertise of internal stakeholders (Internal Audit, Security Office, Legal, Human Resources...) who will be also bound by a duty of confidentiality or may opt to refer the case to an external party such as a law firm, consultants, the police or to a regulatory/enforcement agency as need be.

For concerns reported through the Reporting Platform, the Reporter will receive an acknowledgement of receipt of their concern within a 7 day period. Feedback to the Reporter will be given in a reasonable timeframe, not exceeding 3 months from receipt of the concern (6 months if the matter requires a particular complex investigation).

D - Non retaliation

eDreams ODIGEO strictly prohibits any retaliation or intimidation against anyone raising a genuine concern or cooperating in an investigation.

Retaliation covers actions aimed at dissuading someone from reporting an ethical concern, including threats or attempts that may happen both in the workplace or outside the company, and is strictly prohibited. Examples of retaliation may include: harassment, threatening language, demotion, suspension, dismissal, salary reduction, negative performance evaluation, or negative reference for employment purposes, adverse changes in responsibilities or contract conditions - unless for legitimate reasons.

eDO will not take any action against anyone who reports a concern in good faith even if the concern is later proved to be unsubstantiated. However, there may be consequences for those who intentionally or maliciously give false, defamatory or misleading information.

Should a Reporter suspect they have been the subject of retaliation, they should report it immediately to the Compliance Committee using the channels described in Section 4.

6. What rights are guaranteed for people suspected of misconduct?

eDO is committed to protecting the confidentiality of all individuals involved in a concern reported through the Reporting Channels.

The identity of any person named by a Reporter as part of a concern will be kept strictly confidential by the recipients of the Reporting Channels (line manager, HR team, Legal team, Compliance Committee members as the case may be), including during the investigation phase.

A strict exception to this confidentiality may be if it is required by law to disclose the name of the suspected person.

In all circumstances, nothing in this Policy affects the rights of defence of any person accused or implicated: the right to be defended and represented will be respected in accordance with the applicable regulations.

7. What happens after a concern is reported?

When the concern is shared with a line manager or HR, they will directly manage the matter, potentially in coordination with other internal teams including the Compliance Committee and/or HR should they solicit them.

After a concern has been submitted via the Reporting Platform, it will be communicated to the Compliance Committee and a receipt confirmation will be sent to the Reporter within 7 days.

Depending on the nature of the concern, it may be classified as:

- (i) out of scope/irrelevant (see scope definitions in Section 3),
- (ii) a request for an eDO Policy clarification/consultation, or
- (iii) a matter that requires investigation.

→ (i) In case the concern reported is out of scope or irrelevant:

If the concern reported falls within the excluded categories listed in Section 3 there will be no follow-up by the Compliance Committee: eDO has given exclusive jurisdiction to some expert teams to manage these concerns; therefore, Reporters will be encouraged to contact eDO expert teams directly, in this Policy and in the form available on the Reporting Platform.

If the concern reported is manifestly ill-founded or fanciful (i.e. not expressing a plausible concern such as obvious irrelevant claims based on preposterous, vindictive statements), the Compliance Committee will not follow-up after its members unanimously consider the reported concern falling under such category.

→ (ii) in case the concern reported requests an eDO Policy clarification:

The Compliance Committee will provide the Reporter with an appropriate answer as diligently as possible.

→ (iii) In cases where an investigation is required:

The Compliance Committee will identify the steps, relevant bodies necessary to address & investigate the matter and assess the accuracy of the allegations that are part of the concern. It will proceed as described in Section 5C. A follow-up will be made within 3 months (up to 6 months

in case of complex investigations) and feedback will be provided to the Reporter when available within this timeframe.

In cases where the investigation reveals the existence of a criminal offence, eDO will refer the case to the competent public body, as need be.

In case a breach of compliance is evidenced through the investigation, the Compliance Committee will propose the adoption of preventive, detection or reaction measures, including disciplinary proceedings as necessary.

Personal data aspects:

A diligent and secure record of all concerns reported will be kept by the Compliance Committee. These records will be only accessible to the Compliance Committee members; personal data information will be removed in compliance with GDPR provisions. *Removal* means destruction of the personal data or adaptation of the personal data in such a way that identification of the Reporter and the implicated person are no longer possible.

Personal data relating to substantiated claims will be retained only for the period required to serve the Policy purposes, to the extent reasonably necessary to comply with an applicable legal requirement, or as advisable in light of an applicable statute of limitations.

To learn more about the collection and processing of personal data based on the purposes established in this Policy, please see **Annex 1 - Reporting Privacy Notice**.

8. What are the roles & responsibilities established by this Policy?

The Reporter must report the concern in compliance with this Policy. Reporters are encouraged to collaborate during the investigation, providing any honest and reliable information and documentation that may be requested from them during the investigation process.

The Compliance Committee is responsible for:

- managing concerns made through the Reporting Platform, and/or reported by line managers or HR,
- ensuring that the Reporter's identity is kept confidential, as well as complying with data protection requirements,
- assessing the risk associated with the reported concern,
- defining the adequate steps for the investigation when appropriate,
- escalating to appropriate individuals as applicable, (the Chief People Officer, the General Counsel, the Chief Executive Officer, the Chief Financial Officer...) in cases where there could be disciplinary consequences for an employee and/or severe consequences for the company,
- identifying appropriate safeguards to address any control gaps identified in the context of the reported concern,
- providing an answer to Reporters,
- implementing and updating this Policy,

- ensuring with the Human Resources team that proper training on this Policy is being provided to eDO employees, and that periodic refreshers are sent out.

Group Human Resources are responsible for:

- ensuring that the Policy is formally communicated to all eDO employees,
- the management of any potential consequences relating to non-compliance with the Policy.

Employees are expected to **exercise good judgement, and use all of the Reporting Channels sensibly and appropriately.**

Should their assistance be required as part of an investigation launched by eDO, including by the Compliance Committee, they are expected to answer questions completely and honestly. Lying to the people performing the investigation, delaying, interfering with (i.e.: altering information or manipulation of evidence), or refusing to cooperate in an investigation may lead to disciplinary measures. Employees may refuse to cooperate if there is a conflict of interest (including situations when the investigation involves a spouse, descendants, or other relatives), either before or during the investigation, as soon as they become aware of them. In these cases, disciplinary measures would not be considered.

All parties involved, including persons potentially suspected of misconduct, are entitled to confidentiality to avoid unnecessary damage to their reputation. Therefore, when an employee participates in or learns about an investigation, they must keep the matter confidential.

9. Policy updates/Amendments

This Policy was approved by the Board of Directors in May 2023 and came into effect in September 2023. It will be updated as necessary to protect the interests of eDO without impeding the process to conduct business in an ethical and efficient manner.

10. Language Preference and Document Discrepancies

This Policy is available in multiple languages for convenience of eDO Stakeholders. Despite the efforts made to provide an accurate translation, there may be differences in language and terminology. Therefore eDO Stakeholders are advised to refer to the English version of the document, which will take precedence and prevail in the case of any doubts or inconsistencies.

Annex 1. - Reporting Privacy Notice

1. What is the purpose of this Privacy Notice?

With this Privacy Notice eDreams International Network, S.L. with the address: Calle López de Hoyos, 35, 2ª, 28002, Madrid, Spain (hereinafter “**eDreams ODIGEO**”) informs why and how eDreams ODIGEO and the group of companies that are included in the eDreams ODIGEO group companies (hereinafter “**eDreams ODIGEO group entities**”) collect and process personal data in the context of the reporting process, that includes assessing the admissibility of any concern reported to the Compliance Committee through the Reporting Platform or directly by a Reporter or a line manager, checking facts and taking appropriate measures, if necessary.

eDreams ODIGEO group entities process personal data in accordance with this Privacy Notice. This includes any personal data relating to the Reporters, as well as personal data relating to the individuals against whom an allegation has been made or those who have been identified as having information about the allegation (hereinafter referred to as “**Individuals**”).

2. Who is the data controller of personal data?

The data controller is anyone responsible for determining the purposes and means of processing the Individuals' personal data. The data controller of all the concerns reported through the designated channels is eDreams ODIGEO. However, please note that depending on the company of the eDreams ODIGEO group of entities in which the individual wants to address the concern, eDreams ODIGEO will proceed to share the concern with the appropriate data controller, and eDreams ODIGEO will act as data processor (i.e. the entity that helps to achieve the purposes determined by the data controller) of the company of the eDreams ODIGEO group entities to which the concern relates to.

The specific identity of the data controllers of the eDreams ODIGEO group are listed below:

- eDreams International Network, S.L., address: Calle López de Hoyos, 35, 2ª, 28002, Madrid, Spain,
- Opodo Ltd., address: 26 – 28 Hammersmith Grove, 5th floor, London, W6 7BA, United Kingdom,
- Opodo, GmbH., address: Hermannstraße 13, 20095 Hamburg, Germany,
- Go Voyages, S.A.S., address: 11 avenue Delcassé, 75008 Paris, France,
- ODIGEO Hungary, Kft., address: 1065 Budapest, Nagymező utca 44,
- eDreams, S.R.L., address: Via Gustavo Fara, 26, 20124, Milan,
- eDreams International Network, S.L., Branch in Italy, Via Gustavo Fara, 26, 20124, Milan,
- eDreams International Network, S.L., Sucursal em Portugal (Branch in Portugal), address: Rua Heróis e Mártires de Angola, 59, Piso 4, B400, 4000-285 Porto.

All the entities of the eDreams ODIGEO group of companies have designated a Data Protection Officer that can be contacted through the channels listed in section 7 of this Privacy Notice).

3. What kind of personal data is processed and where does this data come from?

eDreams ODIGEO may obtain personal data in the context of the use of the Reporting Channels. In particular, eDreams ODIGEO may obtain this data i) because it was provided by the Reporter directly (by email or through the Reporting Platform) or indirectly (through a line manager or HR) to the Compliance Committee, ii) because others provided this data to eDreams ODIGEO (e.g. because the individual is named in the reported concern as an accused person or as a witness).

The following personal data may be collected and processed during the reporting and investigation process:

- identity, job position and contact details of the Reporter, including the Reporter's corporate and/or personal email,
- identity, job position and contact details of the individual(s) mentioned in the concern reported (individuals against whom an allegation has been made or those who have been identified as having information about the allegation),
- as well as any other information voluntarily communicated by the Reporter or resulting from the handling of the concern.

It is strongly advisable to avoid providing eDreams ODIGEO with any special categories of personal data unless it is strictly necessary and specifically requested. eDreams ODIGEO will not request or process any special categories of personal data (also known as sensitive personal data; i.e. information on racial and/or ethnic origin, religious and/or ideological convictions, trade union membership or sexual orientation) unless it is strictly necessary and specifically requested. Exceptionally, such special categories of personal data may be voluntarily disclosed by the individual.

The corresponding appropriate security measures will be implemented to protect such data in line with this Reporting Channel Privacy Notice.

4. What are the purposes and legal grounds of processing personal data?

- In relation to the information and documentation provided when reporting a concern, the individual's personal data will be processed to lodge and follow up on the concern filed, to investigate the facts reported and, where appropriate, to apply the technical, disciplinary or legal measures deemed necessary, concerns of facts relevant to criminal law, competition law and labour law, to provide safe Reporting Channels to all eDO Stakeholders,
- Additionally, the Reporting Channels allow all eDO Stakeholders to report wrongdoings to ensure a lawful, ethical and fair way to conduct business.

This processing of personal data is necessary for compliance with the legal obligation to which eDreams ODIGEO and the eDreams ODIGEO group entities are subject².

²article 6 para 1 lit c of GDPR

5. Who will be the recipient of personal data?

Personal data collected in the context of a reported concern made through the Reporting Platform may be processed by or communicated to the following parties when required:

- members of the Compliance Committee of eDreams ODIGEO responsible for receiving and investigating concerns,
- authorised eDreams ODIGEO employees whose individual involvement depends on the nature or extent of the reported facts (on a strict need-to-know basis),
- external companies and auditors, police, regulatory bodies involved in an investigation procedure under court order, judicial proceeding, request from a regulatory body or any other legal process served on eDreams ODIGEO or in any of the eDreams ODIGEO group entities; in such cases the disclosure would be made only when required by law or if considered necessary to protect eDreams ODIGEO rights,
- the eDreams ODIGEO group company to which the concern relates to.

Important note: *Persons accessing personal data are specifically trained and subject to a reinforced confidentiality obligation contractually provided for.*

eDreams International Network S.L., in its capacity as both the data controller and data processor, has engaged an external party to provide the IT platform used to handle the concerns reported. This arrangement includes a signed confidentiality agreement and a data processing agreement.

6. Is personal data transferred outside the European Union?

The processing of this personal data is conducted within the European Union.

7. How can Individuals control personal data shared when reporting a concern?

Any individual that has provided eDreams ODIGEO with their personal data when reporting a concern, can:

- request the **access and information** of the personal data,
- request the **rectification and deletion** of the personal data,
- request **restriction of processing** of the data or require it to be transferred to another controller,
- **object** to the processing of their personal data at any time for reasons related to their particular situation,
- receive the personal data relating to them, in a structured, commonly used and machine-readable format (**data portability**), and transmit this data to another data controller.

In order to exercise their rights, Individuals should send an email to privacy.reporting@edreamsodigeo.com with the subject "Data Protection Right".

Finally, without prejudice to any other administrative or judicial remedy, Individuals may also consult the Supervisory Authority on Data Protection (for Spain <https://www.aepd.es/>) or any other applicable supervisory authority if they wish.

8. How long will personal data be retained?

The personal data will be kept as long as necessary to process and investigate the concern, or, if applicable, as long as necessary to initiate sanctions or to meet any legal or financial requirement. In any case, if judicial or disciplinary proceedings are initiated, the personal data provided will be kept until those proceedings have been definitively closed.

If none of the aforementioned cases apply, the data must be deleted **3 months** after having been provided in accordance with the reporting process.

Document History:

Issue	Date	Author	Review Details
Version 1	17/05/2023	Compliance Committee DPO CEO & CFO Audit Committee	Policy formalisation Privacy review Review & approval Review & approval
Version 2	20/08/2024	Compliance Committee	Wording adjustments