

## Modern Slavery & Human Trafficking Statement

Sunweb Group recognises that modern slavery and human trafficking are significant global issues and we endeavour to be alert to the risks at all times, not just within our own company but also with all our service providers. We are committed to preventing slavery and human trafficking in all of our activities and to ensuring our suppliers reflect our values and respect for human rights. Sunweb Group fully supports all efforts to combat, prohibit and prevent slavery and human trafficking throughout the world.

### Our Business

Sunweb is a trade name used by Sunweb Group UK Ltd., a private company with limited liability. Sunweb Group UK Ltd. is active in the United Kingdom on behalf of Sunweb Group GmbH (further: 'Sunweb Group'). Sunweb Group is one of the leading digital European travel groups, with numerous brands operating all over Europe and is well known in the travel industry as a reliable and respected organisation. Our permanent staff consists of over 500 people, complemented with 300 travelling representatives at our destinations to accommodate our customers.

Sunweb Group offers Sun and Ski holidays to a wide range of holiday destinations, mainly within Europe. We offer many services including (but not limited to) flights, accommodation and all ground arrangements within these destinations and are careful in our selection of reputable suppliers for all holiday content.

### Our policy

Sunweb Group works closely with its hotel and ground agent suppliers. As part of our Contract Terms & Conditions to be signed by all accommodations and ground agent suppliers we work with, we have included standards in relation to Human Rights and Labor Law and Integrity.

Both state the following in relation to Human Rights and Labor Law:

*Each Sunweb Group Partner confirms that there will be no abuse of labor and that it applies all national and community legal regulations within the scope of employment in tourism. There cannot be any abuse of human rights with regard to the United Nation's Universal Declaration of Human Rights. As examples and not limited to: complying to minimum wages, maximum working hours, appropriate lodging and transportation for employees, no abuse of children or other human rights.*

The management team at Sunweb Group will not hesitate to take action if it is established that a supplier is in breach of the above, which can include removing hotels, tours or attractions from sale and/or reporting them to the relevant authorities.

### **Our process for managing risk**

Sunweb Group continues to work closely with travel trade associations such as ABTA and Travelife to understand trends and risk areas.

We are committed to working with reputable local agents and accommodations in all our destinations and regularly review our supply chains. In addition to this, Sunweb Group assess the risk of modern slavery by promoting the company speak-up policy which encourages employees and other stakeholders to report any malpractice or illegal acts using a prescribed reporting procedure

We strive to ensure that travel has the most positive effect possible and we actively encourage hotel partners to implement credible 3<sup>rd</sup> party certifications recognised or approved by the Global Sustainable Tourism Council (GSTC). Sunweb Group is Travelife Certified, an industry-leading scheme that monitors the social and environmental standards of Tour Operators.

### **Training**

As part of our internal Integrity Code, we reflect our commitment to acting ethically and with integrity in all our business relationships and show our respect for human rights and the integrity of individuals. The Integrity Code is part of our employee onboarding programme and annual awareness training programme and existing staff have access to the document at all times.

### **Board Approval**

This statement has been approved by the Board of Directors of Sunweb Group for Financial year ending October 31, 2024 and will be annually reviewed.

Signed off by Jeroen de Swart, CFO.