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# Global whistleblowing policy of lastminute.com

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lastminute.com N.V. (the “**Company**”) and all the companies of the lastminute.com Group have always been committed to promoting a corporate culture inspired by ethics and legality. Compliance with laws, with the principles expressed in the Code of Conduct and with the rules set out in corporate policies is a duty to be respected by everyone: those who work in the Group, on behalf of the Group, and third parties.

The lastminute.com Group supports and encourages, in order to protect the integrity of all the Companies that are part of it, anyone who intends to report unlawful conduct – and in particular reports of Relevant Violations under Local Whistleblowing Laws, as defined below – to allow them to be stopped in time and action to be taken against their perpetrators, safeguarding the confidentiality of the whistleblowers and protecting them from the risk of retaliation, in full compliance with all applicable legal provisions.

## 1. PURPOSE

The purpose of this document (“**Group Whistleblowing Policy**” or “**Policy**”) is to outline the process for handling Reports in compliance with all whistleblowing protection laws applicable in the Countries in which Companies of the lastminute.com Group are active.

With this Policy, Companies of the lastminute.com Group intend to facilitate potential Whistleblowers – as defined below – in making Reports about Violations the Whistleblowers have gained in their work context, without jeopardising their working or professional relationship.

In particular, this Policy:

- provides the necessary information on the channels, procedures and prerequisites for making Internal Reports and – in the cases provided for by Local Whistleblowing Laws – External Reports and Public Disclosures;
- regulates the procedures for handling Internal Reporting;
- defines the protective measures provided for the protection of Whistleblowers, of the Persons Involved or in any case mentioned in Internal Reports, and of other Protected Persons.

### EXCLUSIONS AND PROHIBITIONS

Given the public purpose of guaranteeing the integrity of the Companies of the lastminute.com Group and unless a Local Whistleblowing Law provides otherwise, this Policy **does not apply** to Reports concerning disputes, claims or requests linked to a **personal interest** of the Whistleblower that relate exclusively to **his/her individual employment relationships** or inherent to his/her employment relationships with hierarchically superior figures.

In addition, **Reports** that are specious, manifestly unfounded, based on mere suspicions, indiscretions or rumours that are scarcely reliable, made **with malice (bad faith) or gross negligence**, or that relate to Infringement Information already in the public domain, are **prohibited**.

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## 2. DEFINITIONS

In this Global Whistleblowing Policy the following terms shall have the following meanings:

- **"Anonymous Report"** means Report from which the identity of the reporter cannot be established;
- **"External Reporting"** means written or oral disclosure of Information on Violation submitted through the External Reporting Channels, where provided for the Local Whistleblowing Laws;
- **"Facilitator"** means individual assisting a Whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential;
- **"GDPR"** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
- **"Information on Violations"** means Information, including well-founded suspicions, concerning Violations committed or which, on the basis of concrete elements, could be committed within lastminute.com N.V. or other Companies of the lastminute.com Group with which the Whistleblowers works, has worked, entertains or has entertained legal relations or has come into contact in the framework of his/her professional or work activity, as well as the elements aimed at concealing such Violations;
- **"Internal Reporting"** means written or oral disclosure of Information on Violation to the Whistleblowing Committee through the Internal Reporting Channels provided for in the Global Whistleblowing Policy;
- **"Internal Reporting Channels"** means the Internal Reporting Channels set up by lastminute.com N.V. and the other Companies of the lastminute.com Group to report Information on Violations, the management of which is entrusted to the Whistleblowing Committee and the Local Whistleblowing Officers, where applicable;
- **"lastminute.com Group"** means the group of companies whose parent company is lastminute.com N.V.;
- **"Local Privacy Laws"** means data protection laws in force in the Countries in which the lastminute.com Group operates (i.e., for the lastminute.com Group companies operating in Europe, the GDPR and local implementing laws);
- **"Local Whistleblowing Officers"** means persons – who serve as local HR Managers or are external consultants – in charge of managing reports locally in some Companies of the lastminute.com Group and, in particular, in the Companies operating in Italy, France, Spain, Germany, Poland and India;
- **"Local Whistleblowing Laws"** means laws relating to the protection of Whistleblowers in force in the Countries in which the Companies of lastminute.com Group operate and, for the lastminute.com Group companies operating in Europe, the laws transposing the Whistleblowing Directive, including, *inter alia*:
  - the Law 401/2022, enacted on 21 March 2022, applicable in France;
  - the Legislative Decree 24/2023, enacted on 10 March 2023, applicable in Italy;

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- the Law 2/2023, enacted on 21 March 2023, applicable in Spain;
  - the Hinweisgeberschutzgesetz, enacted on 12 May 2023, applicable in Germany;
  - the Whistleblower Protection Act, enacted on 14 June 2024, applicable in Poland;
- **"Person Involved"** means Individual or legal entity mentioned in the Internal Report, External Report or Public Disclosure as a person to whom the Violation is alleged or as a person otherwise implicated in the reported or publicly disclosed Violation;
  - **"Protected Persons"** means All persons who benefit from the protection measures under the Global Whistleblowing Policy:
    - Whistleblowers;
    - Facilitators;
    - persons in the same work environment as the Whistleblower and related to the Whistleblower by a stable emotional or family relationship up to the fourth degree;
    - work colleagues of the Whistleblower, who work in the same work context as the Whistleblower and with whom they have a usual and current relationship;
    - entities owned by the Whistleblower or for which the Whistleblower work, as well as entities working in the same work context as the Whistleblower;
    - all other persons in protected categories under the Local Whistleblowing Laws;
  - **"Public Disclosure"** means the action of making Information on Violations publicly available through print or electronic media or otherwise through means of diffusion that reaches a large number of people, for which the Whistleblower is protected only in the cases provided for by Local Whistleblowing Laws;
  - **"Report"** means written or oral communication of Information on Violations;
  - **"Relevant Violations"** means violations relevant to the application of the Local Whistleblowing Laws, and which must be dealt with by the Whistleblowing Committee or the Local Whistleblowing Officer on a priority basis;
  - **"Retaliation"** means any conduct, act or omission, even if only attempted or threatened, committed by reason of the Whistleblowing and which causes or is likely to cause the Whistleblower, directly or indirectly, unjustified harm (e.g.: dismissal, suspension or equivalent measures; downgrading or non-promotion; change of duties, change of place of work, reduction in salary, change in working hours; suspension of training or any restriction on access to training; demerit notes or negative references adoption of disciplinary measures or any other sanction, including a fine; coercion, intimidation, harassment or ostracism; discrimination or any other unfavourable treatment; etc.);
  - **"Violations"** means violations of the law, of the Code of Conduct or of Group policies;
  - **"Whistleblower"** means any individual making an Internal Report, External Report or Public Disclosure of Information on Violations acquired in his or her work context, namely:
    - employees of lastminute.com N.V. or other companies of the lastminute.com Group, including holders of a part-time, full-time or intermittent, fixed-term or open-ended
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- employment relationship, staff leasing, apprenticeship, ancillary, or who perform occasional services;
- self-employed workers carrying out their work with lastminute.com N.V. or other companies of the lastminute.com Group, including holders of contracts of employment (exercising the intellectual professions for the exercise of which registration in special registers or lists is required), agency relationships, commercial representation and other collaborative relationships resulting in the provision of continuous and coordinated work, mainly of a personal nature, even if not of a subordinate nature;
  - freelancers and consultants working for lastminute.com N.V. or other companies of the lastminute.com Group;
  - volunteers and trainees, paid and unpaid, who perform their activity at lastminute.com N.V. or other companies of the lastminute.com Group;
  - shareholders and persons with functions of administration, management, control, supervision or representation of lastminute.com N.V. or other companies of the lastminute.com Group, even when such functions are performed on a mere "de facto" basis and, therefore, in the absence of a regular investiture;
  - suppliers, sub-suppliers, employees and collaborators of the same, who supply goods or services to lastminute.com N.V. or other companies of the lastminute.com Group;
  - former workers of lastminute.com N.V. or other companies of the lastminute.com Group;
  - candidates whose selection process is still in progress and new employees during the probationary period;
- "**Whistleblowing Committee**" means the collegiate body in charge of receiving and managing Internal Reports for lastminute.com N.V. and the other companies of the lastminute.com Group. The Whistleblowing Committee comprises a minimum of 3 and a maximum of 7 members. As per best practices, Committee members may include, *inter alia*, representatives from the Legal, Human Resources, and Internal Audit departments of lastminute.com N.V. or other companies of the lastminute.com Group;
  - "**Whistleblowing Directive**" means Directive (EU) 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.

### 3. INTERNAL REPORTING CHANNELS

Should a Whistleblower have certain information or a reasonable suspicion, based on precise and concordant elements of fact, that a Violation has occurred or may occur, it is possible to make a report, either anonymously or in an identified form, with an absolute guarantee of confidentiality and privacy at all stages of the procedure, through one of the Internal Reporting Channels made available by the lastminute.com Group and described below.

## INTERNAL REPORTING CHANNELS

- A **Web Tool**, which can be used for both written and oral reporting, managed both by the Whistleblowing Committee and the Local Whistleblowing Officers, and available at the following link: [lastminute Whistleblower System | Home \(whistleblowersoftware.com\)](https://whistleblowersoftware.com);
- A **Direct Meeting** with the Local Whistleblowing Officers, were provided by the Local Whistleblowing Laws.

### 3.1. Internal Reporting via the Web Tool

It is possible to make a **written** or **oral** report using the Web Tool, within which segregated channels have been created for each company of the lastminute.com Group.

Once the Whistleblower has accessed the Web Tool via the reference link, he/she shall:

- select the language known;
- choose whether to send the Report anonymously or to reveal his/her identity;
- select the Country concerned and the lastminute.com Group company in whose interest the Report is to be made;
- in Countries where a Local Whistleblowing Officer is appointed, choose whether to send the Report to the Local Whistleblowing Officer only or to the Whistleblowing Committee only or to both;
- choose whether to make a **written** or **oral report**, in the latter case by recording a voice message through the voice messaging system included in the Web Tool;
- fill in the Report form, entering the required information in the different fields and, if necessary, attaching the relevant documentation.

Once the Report has been sent, the Whistleblower will be able to follow its status - including confirmation of its receipt - and continue to communicate securely (and possibly anonymously) with the Whistleblowing Committee or the Local Whistleblowing Officer through a mailbox that can always be accessed via the Web Tool, by entering his/her password.

### 3.2. Direct Meeting

In lastminute.com Group's companies where a Local Whistleblowing Officer has been appointed, the Whistleblower may request a Direct Meeting with him/her via the Web Tool.

The Direct Meeting will be scheduled within a reasonable period of time of up to 15 working days from the request, either by video conference or in person at a location agreed with the Whistleblower.

In this case, before receiving the Report, the Local Whistleblowing Officer issues the Whistleblower with the information for the processing of personal data and obtains his/her consent in the forms required by the current and applicable law.

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The Report is documented by the Local Whistleblowing Officer, with the consent of the Whistleblower, by means of the following alternatives:

- a recording of the conversation on a durable medium;
- a complete and accurate transcript of the conversation;
- a detailed record of the meeting.

The Whistleblower must be given the opportunity to verify, rectify and approve the transcript of the conversation or the minutes of the meeting by affixing his signature.

Upon receipt of the Whistleblowing Report, the Local Whistleblowing Officer records the minutes in the Web Tool. The Local Whistleblowing Officer will share the Whistleblower's identification data with the Whistleblowing Committee only where the Whistleblower has given consent.

Interactions with the Whistleblower will be handled by the Local Whistleblowing Officer through the Web Tool but only if the Whistleblower has left contact details (i.e., e-mail).

### CONTENT OF THE REPORT

Reports must be made in **good faith** and be substantiated, i.e. contain a description of as many elements and circumstances as possible to enable the Whistleblowing Committee or the Local Whistleblowing Officer to carry out the necessary investigation.

In particular, it is advisable to include in the Report:

- the identity of the Whistleblower and his legal relationship with the Company, without prejudice to the possibility of submitting Anonymous Reports;
- the circumstances of time and place in which the fact covered by the Report occurred;
- the description of the facts;
- the personal details or other elements that make it possible to identify the person held responsible for the facts reported ("**Person Involved**").

It is also useful to attach to the Report any documents that may provide evidence of the facts that are the subject of the Report, as well as to indicate other persons potentially aware of the facts.

An absolute certainty as to the actual occurrence of the reported facts and the person responsible for them is not necessary. Instead, it is sufficient if **the Whistleblower** reasonably **believes** that the reported Information on Violations is **true**, in the light of the data available at the time of the Internal Reporting and the circumstances of the specific case.

## 4. MANAGING INTERNAL REPORTING

Once an Internal Whistleblowing Report has been received, the Whistleblowing Committee or the Local Whistleblowing Officer:

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- issues the Whistleblower with an **acknowledgement of receipt** of the Report **within 7 days** from the date of receipt of the Report;
  - diligently follows up the Report, in order to assess its admissibility and verify the relevance, extent and potential risks deriving from the facts reported, maintaining interlocations with the Whistleblower and carrying out the appropriate internal investigations to verify the existence of the facts reported, if necessary with the support of other internal functions and/or external consultants, subject to the signing by such persons of a formal undertaking to protect confidentiality;
  - provide **feedback** to the Whistleblower **within 3 months** from the date of the acknowledgement of receipt or, in the absence of such acknowledgement, within 3 months from the expiry of the 7-day period from the submission of the Report; the feedback consists in the communication of information relating to the **action taken or intended to be taken** on the Report, including the communication of the possible absence of grounds for proceeding with the investigation and the relative dismissal of the Report<sup>1</sup>;
  - draws up a report summarising the investigations carried out and the evidence that has emerged, which will be shared, on the basis of the results, with the competent Group departments or structures of the company of the lastminute.com Group concerned, in order to ensure possible action plans and the adoption of **remedial** and/or **improvement measures** in relation to the reported Violation, verifying the relative adoption or the reasons underlying their non-adoption;
  - submits the results of the investigation activity also to the administrative body of the company of the lastminute.com Group concerned for the initiation of possible sanctioning/disciplinary procedures, without prejudice to the fact that the adoption of the measures remains the competence of the functions in charge thereof;
  - keeps and stores the Report (including Anonymous ones) as well as the documents, reports, transcripts and minutes relating to them:
    - for 1 (year), if dismissed as unfounded;
    - for as long as necessary to process the Report and in any case no longer than 3 (three) years (or any other longer maximum retention period that may be provided for by Local Whistleblowing Laws and Local Privacy Laws<sup>2</sup>) from the date of communication of the final outcome of the

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<sup>1</sup> The Internal Reporting may be dismissed where:

- it is ineligible, in this case the Whistleblowing Committee or the Local Whistleblowing Officer will have to assess the opportunity to forward the Report to other relevant departments or corporate bodies of the lastminute.com Group company concerned, where it concerns offences relevant to the protection of the integrity of this company, even if not included among those reportable under this Policy and the Local Whistleblowing Laws;
- is manifestly unfounded due to the absence of factual elements capable of justifying investigations;
- has a generic content, such as not to allow an understanding of the facts, and the Whistleblower has refused to provide further clarification;
- is accompanied by inappropriate or irrelevant documentation;
- the Whistleblowing Committee or the Local Whistleblowing Officer ascertains that the Report has been made with malicious intent (bad faith) or gross negligence. In this case, the Whistleblowing Committee or the Local Whistleblowing Officer reserves the right to propose to the competent functions or corporate bodies of the company of the lastminute.com Group concerned the opening of disciplinary proceedings against the Whistleblower, if the legal requirements are met.

<sup>2</sup> It is specified that in relation to Reports concerning the following Countries, the Whistleblowing Committee or Local Whistleblowing Officers reserve the right to retain data and documentation related to such Reports for a longer period, in compliance with Local Whistleblowing Laws and Local Privacy Laws that allow it:

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reporting procedure, in compliance with the confidentiality obligations provided for by the Local Whistleblowing Laws and Local Privacy Laws.

After **3 years** (or within any other longer maximum retention period that may be provided for by Local Whistleblowing Laws and Local Privacy Laws), the Reports and the related documentation will be **deleted**.

This is without prejudice to the opening of legal proceedings as a result of the Report during the aforementioned three-year period (or any other longer maximum retention period that may be provided for by Local Whistleblowing Laws and Local Privacy Laws), in which case the data and documents pertaining to the Report may also be used thereafter in compliance with any applicable laws (including Local Whistleblowing Laws).

In any case, personal data that are clearly not useful for the processing of a specific Whistleblowing Report shall not be collected or, if accidentally collected, shall be deleted immediately.

In order to ensure an efficient and timely management of the Internal Reports received, a "**Regulation for the Management of Internal Reports - Whistleblowing**" was approved - to which reference should be made for a more complete examination - which regulates in detail the procedural process to be followed by the Whistleblowing Committee and the Local Whistleblowing Officer.

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- for Spain, personal data relating to Reports received and internal investigations conducted cannot be kept for a period of more than 10 (ten) years;
  - for Italy, Reports and related documents are retained for as long as necessary for their processing and in any case no longer than 5 (five) years from the date of communication of the final outcome of the reporting procedure;
  - for France, Reports and related documents may only be kept for as long as is strictly necessary and proportionate for their processing and for the protection of the persons concerned and the third parties mentioned, taking into account the time required for any further investigation;
  - for UK, Reports and related documents may only be kept for as long as is strictly necessary and proportionate for their processing.

## WHAT TO DO IF YOU MISTAKENLY RECEIVE A REPORT INTENDED FOR THE WHISTLEBLOWING COMMITTEE OR THE LOCAL WHISTLEBLOWING OFFICER

Anyone, outside the Whistleblowing Committee and the Local Whistleblowing Officers, who receives Reports for any reason will be required to:

- ✓ **transmit the Report** to them within 7 days of its receipt, via the Web Tool, simultaneously notifying the Whistleblower of the transmission;
- ✓ **maintain the strictest confidentiality** in relation to the identity of the Whistleblower, the Persons Involved or named in the Report;
- ✓ **not disclosing** and maintaining the **strictest confidentiality** in relation to the content of the Report and any documents attached thereto;
- ✓ where the **Report mistakenly received** is contained in an **e-mail**, proceed to its **final deletion** after forwarding the Report to the Whistleblowing Committee or to the relevant Local Whistleblowing Officer;
- ✓ after receiving the Report from the first recipient, the Whistleblowing Committee or the Local Whistleblowing Officer **will** - where possible - **inform the Whistleblower**, unless the first recipient has already done so.

## 5. EXTERNAL REPORTING CHANNELS

Notwithstanding the fact that the use of Internal Reporting Channels must be considered a priority, where the Local Whistleblowing Laws provide for it, the Whistleblower may use the External Reporting Channels established by the Public Authorities in the relevant Countries.

The list of External Reporting Channels and competent Public Authorities is included under **Annex 1<sup>3</sup>** to this Policy.

The External Reporting Channels guarantee, also through the use of encryption tools, the confidentiality of the identity of the Whistleblower, of the Person Involved and mentioned in the Report, as well as the content of the Report and of the relevant documentation.

In some Countries, access to the External Reporting Channels may be only allowed for the Relevant Violations indicated under **Annex 2** and upon the occurrence of the (alternative) conditions provided for by the Local Whistleblowing Laws, including the following:

- the Internal Reporting Channels are not active or, even if activated, do not comply with the provisions of the Local Whistleblowing Laws;

<sup>3</sup> The list of External Reporting Channels and the competent Public Authorities shall, where appropriate, be updated with an indication of the competent Public Authorities in other countries in which lastminute.com Group's companies have their registered offices, should they be established.

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- the Whistleblower has already made an Internal Report which, however, was not followed up;
  - the Whistleblower has well-founded reasons to believe that, if he/she made an Internal Report, the same would not be effectively followed up or that the same Report could determine the risk of retaliation;
  - the Whistleblower has reasonable grounds to believe that the Relevant Violation may constitute an imminent or obvious danger to the public interest.

It is understood, however, that External Reports through External Reporting Channels are always permitted in all the cases provided for by mandatory Local Whistleblowing Laws.

The management of External Reports is entrusted to the Public Authorities where the External Reporting Channels are established, according to the modalities provided by them in their own regulations or guidelines, to which we refer.

## 6. PUBLIC DISCLOSURE

Notwithstanding the fact that the use of Internal Reporting Channels must be considered a priority, where the Local Whistleblowing Laws provide for it, the Whistleblower may make a Public Disclosure, disclosing in the public domain the Relevant Violations indicated under **Annex 2**.

At the time of the approval of this Policy, Public Disclosure is only permitted for Reports relating to the Italian, Spanish, German and English companies of the lastminute.com Group, subject to the following (alternative) conditions:

- the Whistleblower has previously made an Internal Report and an External Report, or has made an External Report directly and has not received a reply within the deadline set regarding the measures envisaged or adopted to follow up the Reports;
- the Whistleblower has reasonable grounds to believe that the Relevant Violation may constitute an imminent or obvious danger to the public interest;
- the Whistleblower has well-founded reasons to believe that the External Report may entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as those in which evidence may be concealed or destroyed, or in which there is a well-founded fear that the recipient of the Report may be in collusion with the author of the Relevant Violation or involved in the Violation itself.

## 7. PROTECTIVE MEASURES

Each company of the lastminute.com Group is committed to offering Whistleblowers and other Protected Persons the protections and safeguards described below.

It should be noted that waivers and settlements, in whole or in part, which relate to the rights and protections set out in this Policy shall not be valid unless they are made in the protected forums (judicial, trade union administrative) under applicable laws.

The additional protective measures provided by the Local Whistleblowing Law are set out in **Annex 3**.

## CONDITIONS FOR THE PROTECTION OF THE REPORTER AND PROTECTED SUBJECTS

For the Whistleblower and the other Protected Persons to benefit from the protection measures described below, the following (cumulative) conditions must be met:

- ✓ the Whistleblower has made the Report based on a reasonable belief that the Information about the reported Violations was true and within the scope of this Policy and the Local Whistleblowing Laws;
- ✓ the Report was made in accordance with the conditions prescribed by this Policy.

When the criminal liability of the Whistleblower for the offences of defamation or slander or his civil liability, for the same reason, in cases of wilful misconduct or gross negligence is established, the protection measures are not guaranteed and the Whistleblower shall also be subject to disciplinary sanctions.

### 7.1. Protection of confidentiality

Each company of the lastminute.com Group protects the confidentiality of the identity of the Whistleblower, the Facilitator, the Person Involved and the persons mentioned in the Whistleblowing, as well as the content of the Whistleblowing and the related documentation, in accordance with the Local Whistleblowing and Local Privacy Laws.

The Whistleblowing Committee and the Local Whistleblowing Officer may not disclose the identity of the Whistleblower and any other information from which such identity may be inferred, directly or indirectly, except with his/her express written consent, unless this is necessary due to legal requirements in court proceedings.

The duty of confidentiality does not preclude or limit any duty to report to the Judicial Authority that may arise as a result of Internal Reporting.

## PROCESSING OF PERSONAL DATA

Any processing of personal data, including communication between the competent authorities, must be carried out in accordance with the Local Privacy Law, in compliance with the principles of necessity, proportionality and lawfulness of the processing, as well as in compliance with the principle of minimization according to which only personal data that are relevant and necessary in relation to the purposes of this Policy may be processed.

For further details regarding the processing of data, please refer to the complete Privacy Policy, published for all interested parties on the Company's website and available at the following link: [lastminute Whistleblower System | Home \(whistleblowersoftware.com\)](https://www.lastminute.com/whistleblowersoftware.com).

On each Report, the Person Involved and other persons mentioned in the Report may not immediately receive a specific Privacy Policy regarding the processing of their data, where there is a risk that, by providing it, the possibility of effectively verifying the validity of the Report or collecting the necessary feedback may be compromised.

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## 7.2. Prohibition of retaliation

Each company of the lastminute.com Group prohibits any Retaliation - even if only attempted or threatened - against the Whistleblowers and the other Protected Subjects, carried out on the ground of the Report, which causes or may cause them, directly or indirectly, an unfair damage, to be intended as unjustified damage.

Acts taken in breach of the prohibition of retaliation are null and void.

In the context of judicial or administrative proceedings or in any case of extrajudicial disputes concerning the ascertainment of retaliation against the Whistleblowers and other Protected Persons, it is presumed that such retaliation was carried out because of the Report. Therefore, the burden of proving that such conduct or acts were motivated by reasons unrelated to the Report is on the person who carried them out.

In the event of a claim for compensation submitted to the Judicial Authority by the Whistleblower or the other Protected Persons, if such persons prove that they have made a Report and suffered a damage, it shall be presumed that the damage is the consequence of such Report, unless proven otherwise.

### WHOM TO TURN TO IN CASE OF RETALIATION?

The Whistleblower or other Protected Person who believes that he/she has suffered Retaliation as a result of the Report submitted may:

- report it to the Whistleblowing Committee or to the Local Whistleblowing Officer, through the Internal Reporting Channels;
- report it to the Public Authorities in charge of the External Reporting Channels, in case it is provided for by the Local Whistleblowing Laws.

## 7.3. Rights and Protection of the Person Involved

Each company of the lastminute.com Group applies the same measures to protect the confidentiality of the Whistleblower, also to the Person Involved indicated as the person responsible for the Violation in the Report, except in the case where the company may be obliged by law to disclose the identity of the Person Involved (e.g.: at the request of the Judicial Authority).

Furthermore, to the Person Involved is guaranteed:

- the right to be informed within a reasonable period of time about the charges brought against him/her and any disciplinary sanctions taken against him/her;
- the right to be heard by the Whistleblowing Committee or by the Local Whistleblowing Officer in order to protect his or her right of defence, also by means of a formal procedure, through the acquisition of written observations and documents, in accordance with the applicable labour laws.

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## 8. SANCTIONS

Without prejudice to the sanctions which may be applied by the State Public Authorities and/or other additional liability profiles, each company of the lastminute.com Group shall adopt disciplinary or contractual sanctions (e.g. termination of contract, actions for damages, liability or revocation for just cause) as it deems appropriate against those responsible for violating this Policy, modulated in relation to the seriousness and in accordance with the applicable labour laws.

## 9. ADOPTION AND DISSEMINATION

The Global Whistleblower Policy was adopted by the board of directors of the Company (the "**Board**") on 18 December 2023 and implemented by the boards of the companies of the lastminute.com Group required to implement their local whistleblowing system<sup>4</sup>.

This Global Whistleblower Policy shall be published on the Company's website.

Each company of the lastminute.com Group shall ensure, where necessary, the translation of the Policy into local languages and shall be responsible for its effective implementation and promote its dissemination both within and outside them.

The Whistleblowing Committee and the Local Whistleblowing Officers are in charge of monitoring that this Policy complies with best practices, applicable Local Whistleblowing Laws, overseeing its implementation and ensuring the maintenance of the Web Tool for the collection and management of Reports, as well as promoting and coordinating information and training activities on its operation.

## 10. COMPLIANCE WITH APPLICABLE LAWS

In the event of conflict, the mandatory legal provisions provided for by Local Whistleblowing Laws and Local Privacy Laws shall prevail over the conflicting policy rules stipulated in this Global Whistleblowing Policy.

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<sup>4</sup> Bravoventure Poland Sp.z.o.o.; Red Universal de Marketing y Bookings Online S.A.; Bravoventure Spain S.L.U.; StarTech S.r.l.; Comvel GmbH; LMnext UK Ltd.

## ANNEX 1 – LIST OF EXTERNAL REPORTING CHANNELS AND COMPETENT PUBLIC AUTHORITIES

Below is a list of the main External Reporting Channels and competent Public Authorities designated in some of the Countries in which the lastminute.com Group operates.

COUNTRY	PUBLIC AUTHORITY	EXTERNAL REPORTING CHANNEL
ITALY	<b>Autorità Nazionale Anticorruzione - ANAC</b>	<a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>
	<b>Garante per la protezione dei dati personali</b>	<a href="https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9067572">https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9067572</a>
	<b>Ministero del Lavoro e delle Politiche Sociali</b>	<a href="https://trasparenza.lavoro.gov.it/contenuto108_pagina_769.html">https://trasparenza.lavoro.gov.it/contenuto108_pagina_769.html</a>
SPAIN	<b>Autoridad Independiente de Protección del Informante - AAI</b>	<a href="https://www.proteccioninformante.gob.es">https://www.proteccioninformante.gob.es</a>
	<b>Oficina Antifrau de Catalunya</b>	<a href="https://www.antifrau.cat/en/mailbox/report-corruption">https://www.antifrau.cat/en/mailbox/report-corruption</a>
	<b>Agencia Valenciana Antifrau</b>	<a href="https://www.antifraucv.es/cuestiones-generales/">https://www.antifraucv.es/cuestiones-generales/</a>
GERMANY	<b>Externe Meldestelle Des Bundes</b>	<a href="https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html">https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html</a>
	<b>Bundesbeauftragte für den Datenschutz und die Informationsfreiheit</b>	<a href="https://www.bfdi.bund.de/DE/Service/Kontakt/kontakt_node.html">https://www.bfdi.bund.de/DE/Service/Kontakt/kontakt_node.html</a>
UK	<b>Prescribed people and bodies</b>	<a href="#">Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk)</a>

<b>POLAND</b>	<b>Centralne Biuro Antykorupcyjne</b>	<a href="https://www.cba.gov.pl/pl/kontakt/zglos-korupcje/4705.Zglos-korupcje.html">https://www.cba.gov.pl/pl/kontakt/zglos-korupcje/4705.Zglos-korupcje.html</a>
<b>FRANCE</b>	<b>Haute Autorité pour la transparence de la vie publique (HATVP)</b>	<a href="https://www.hatvp.fr/en/high-authority/">https://www.hatvp.fr/en/high-authority/</a>
	<b>Commission Nationale de l'Informatique et des Libertés (CNIL)</b>	<a href="https://www.cnil.fr/fr/saisir-la-cnil/lanceurs-dalerte-adresser-une-alerte-la-cnil">https://www.cnil.fr/fr/saisir-la-cnil/lanceurs-dalerte-adresser-une-alerte-la-cnil</a>
<b>PORTUGAL</b>	<b>Mecanismo Nacional Anticorrupção (MENAC)</b>	<a href="https://www.menac.pt">https://www.menac.pt</a>
	<b>Ministerio Público</b>	<a href="https://www.ministeriopublico.pt">https://www.ministeriopublico.pt</a>
	<b>Banco de Portugal (financial issues)</b>	<a href="https://www.bportugal.pt">https://www.bportugal.pt</a>

## ANNEX 2 – RELEVANT VIOLATIONS

LOCAL WHISTLEBLOWING LAW	RELEVANT VIOLATIONS
<p><b>ITALY:</b></p> <p><b>LEGISLATIVE DECREE 24/2023</b></p>	<p>Violations of EU legislation, namely:</p> <ul style="list-style-type: none"> <li>• Offences committed in breach of the EU legislation set out in Annex 1 to the Legislative Decree 24/2023 and any national provisions implementing it, relating to the following areas: public contracts; services, products and financial markets and prevention of money laundering and financing of terrorism; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and protection of personal data and security of networks and information systems.</li> <li>• Acts or omissions affecting the financial interests of the EU, including: fraud, corruption and any other illegal activity related to EU expenditure.</li> <li>• Acts or omissions relating to the internal market, which undermine the free movement of goods, persons, services and capital, including: competition and state aid violations, corporate tax violations and mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law.</li> <li>• Acts or conduct that frustrate the object or purpose of European Union provisions in the areas indicated in the preceding points, including: unfair business practices and abuse of a dominant position, predatory pricing, target rebates, tying which violate the protection of free competition.</li> </ul>
<p><b>SPAIN:</b></p> <p><b>LAW 2/2023</b></p>	<ul style="list-style-type: none"> <li>• Any act or omission that may constitute a breach of European Union law, provided that it falls within the scope of the European Union acts listed in Annex 1 of the Whistleblowing Directive, relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and protection of personal data and security of networks and information systems.</li> <li>• Actions or omissions that may constitute a serious or very serious offence or administrative offence under Spanish law.</li> <li>• Serious or very serious offences and administrative offences that result in a financial loss to the Treasury</li> </ul>

	<p>and social security.</p> <ul style="list-style-type: none"> <li>• Sexual harassment in the workplace or breaches of safety regulations in the workplace.</li> </ul>
<p><b>GERMANY</b></p> <p><b>HINWEISGEBERSCHUTZGESETZ</b></p>	<ul style="list-style-type: none"> <li>• Infringements punishable by law .</li> <li>• Violations subject to fines, insofar as the violated regulation protects life, limb or health or protects the rights of employees.</li> <li>• Infringements of other German or European legal provisions in the following areas: public procurement; financial services, products and markets and the prevention of money laundering and the financing of terrorism; product safety and conformity; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; the protection of privacy and the protection of personal data and the security of networks and information systems.</li> </ul>
<p><b>UK</b></p>	<ul style="list-style-type: none"> <li>• Criminal offences.</li> <li>• Breach of any legal obligation.</li> <li>• Miscarriages of justice.</li> <li>• Danger to the health and safety of any individual.</li> <li>• Damage to the environment.</li> <li>• The deliberate concealing of information about any of the above.</li> </ul>
<p><b>POLAND:</b></p> <p><b>USTAWA O OCHRONIE SYGNALISTÓW</b></p>	<p>Violations of Polish legislation, including:</p> <ul style="list-style-type: none"> <li>• Offences related to EU law: Any acts or omissions that contravene EU regulations outlined in the Whistleblower Protection Directive 2019/1937, particularly in areas such as public procurement, financial services and markets, prevention of money laundering and financing of terrorism, product safety, environmental protection, health and safety regulations, privacy and personal data protection, and cybersecurity.</li> <li>• National criminal and administrative offences: Violations under Polish law which may also constitute serious or very serious offences, resulting in significant financial harm or risk to public safety. This includes corruption, misuse of public office, and any other illicit activities related to state finances or public sector management.</li> <li>• Internal market violations: Conduct undermining the proper functioning of the internal market, especially in areas such as competition law violations, abuse of dominant market positions, or unfair business practices like predatory pricing or corporate tax avoidance schemes. These are covered under both Polish and EU</li> </ul>

	<p>competition law, aiming to maintain fair trade and economic stability.</p>
<p><b>FRANCE:</b></p> <p><b>LOI SAPIN II</b></p>	<p>Violations relevant to the whistleblowing reporting system in France include acts and omissions that contravene European and national legislation in specific areas, in line with the provisions of the Loi Sapin II (Law No. 2016-1691) and the EU Directive 2019/1937, transposed into French law.</p> <ul style="list-style-type: none"> <li>● Breaches of European Union rules: These include breaches of the acts listed in Annex 1 of the WB Directive and the national provisions transposing them. These areas include, but are not limited to: <ul style="list-style-type: none"> <li>○ public procurement and transparency in contract management.</li> <li>○ financial services, products and markets, and measures to prevent money laundering and terrorist financing.</li> <li>○ product safety, compliance and transportation, including environmental, radiological and nuclear protection.</li> <li>○ public health, food safety, animal welfare and consumer protection.</li> <li>○ privacy and security of computer networks.</li> </ul> </li> <li>● Violations relating to the financial interests of the European Union: Fraud, corruption and other illegal conduct adversely affecting the EU budget, in accordance with Regulation (EU, Euratom) No. 2988/95 and other related rules.</li> <li>● Acts or omissions detrimental to the internal market: Irregularities that undermine the free movement of goods, persons, services, and capital, such as violations of competition rules (e.g., abuse of dominant position), unlawful state aid, or abusive tax practices designed to obtain undue advantages.</li> <li>● Serious offenses or irregularities under French law: Any violation of national laws or regulations, including criminal offenses or serious administrative infractions affecting strategic sectors or fundamental rights, such as safety at work or environmental protection.</li> <li>● Sexual harassment: Included the violations that could be reported in compliance with national laws.</li> <li>● Bullying: Including systematic conduct detrimental to dignity and psychological well-being in the workplace.</li> <li>● Discrimination: Any differential treatment based on protected criteria.</li> </ul>

<p><b>PORTUGAL:</b></p> <p><b>LEI 93/2021</b></p>	<p>Reportable violations under Portuguese law include:</p> <ul style="list-style-type: none"><li>● Violations of European Union law, as set out in the annex to Directive (EU) 2019/1937 and in the relevant national implementing legislation, in the following areas:<ul style="list-style-type: none"><li>- Public procurement;</li><li>- Services, products, and financial markets, prevention of money laundering and terrorist financing;</li><li>- Product safety and compliance;</li><li>- Transport safety;</li><li>- Environmental protection;</li><li>- Radiation protection and nuclear safety;</li><li>- Food and feed safety, animal health and welfare;</li><li>- Public health;</li><li>- Consumer protection;</li><li>- Privacy and personal data protection, network and information system security.</li></ul></li><li>● Acts or omissions affecting the financial interests of the EU, as provided for in Article 325 TFEU, including: fraud, corruption, or other illegal activities related to EU spending.</li><li>● Violations of the internal market, as provided for in Article 26(2) TFEU, including:<ul style="list-style-type: none"><li>- Violations of competition and state aid rules;</li><li>- Violations of corporate tax law;</li><li>- Tax avoidance mechanisms are contrary to the spirit of EU law.</li></ul></li><li>● Other offenses relevant to whistleblowing, according to national law, including:<ul style="list-style-type: none"><li>- Organized crime and serious economic and financial crime;</li><li>- Acts or omissions that defeat the purpose of EU rules, even if they are formally compliant;</li><li>- Violations of occupational health and safety rules;</li><li>- Retaliation against the whistleblower or persons connected to them.</li></ul></li></ul>
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## ANNEX 3 – ADDITIONAL PROTECTIVE MEASURES

LOCAL WHISTLEBLOWING LAW	ADDITIONAL PROTECTIVE MEASURES
<p style="text-align: center;"><b>ITALY:</b> <b>LEGISLATIVE DECREE 24/2023</b></p>	<ul style="list-style-type: none"> <li>• <b>Limitations of liability regarding the disclosure and dissemination of certain categories of information</b></li> </ul> <p>Whistleblowers and Protected Persons are not punishable if disclose or disseminate information on Violations:</p> <ul style="list-style-type: none"> <li>- covered by the obligation of secrecy (official, professional, scientific and industrial secrets, breach of the duty of loyalty and faithfulness), with the exception of obligations of secrecy relating to classified information, forensic and medical professional secrecy, secrecy of the deliberations of judicial bodies;</li> <li>- relating to the protection of copyright or the protection of personal data;</li> <li>- which offends the reputation of the Involved Person.</li> </ul> <p>The limitation of liability shall apply provided that the following (cumulative) conditions are met:</p> <ol style="list-style-type: none"> <li>a. at the time of the disclosure or dissemination, the Whistleblower had reasonable grounds to believe that the Information was necessary to discover the Violation;</li> <li>b. the Internal Reporting was made under the conditions set out in the Global Whistleblowing Policy;</li> <li>c. the information was acquired in a lawful manner.</li> </ol> <ul style="list-style-type: none"> <li>• <b>Support measures by Third Sector entities</b></li> </ul> <p>Whistleblowers and Protected Persons may benefit from the support measures offered by Third Sector entities registered in the list set up by ANAC (<a href="https://www.anticorruzione.it/-/whistleblowing">https://www.anticorruzione.it/-/whistleblowing</a>).</p> <p>Third Sector organisations provide assistance and advice free of charge:</p> <ul style="list-style-type: none"> <li>- on the modalities of reporting;</li> <li>- on the protection from retaliation recognised by national and EU regulations;</li> <li>- on the rights of the Person Involved;</li> <li>- on the terms and conditions of access to legal aid in the event of legal proceedings.</li> </ul>

<p style="text-align: center;"><b>SPAIN:</b> <b>LAW 2/2023</b></p>	<ul style="list-style-type: none"> <li>● <b>Financial and psychological support</b> Whistleblowers may benefit from financial and psychological support, on an exceptional basis, if so decided by the Independent Whistleblower Protection Authority, after assessing the circumstances arising from the submission of the Report.</li> <li>● <b>Exemption or mitigation of the applicable sanctions</b> Whistleblowers may benefit from the possible exemption or mitigation of the applicable sanctions, if the Whistleblower himself/herself participated in the commission of the reported Violation.</li> </ul>
<p style="text-align: center;"><b>GERMANY:</b> <b>HINWEISGEBERSCHUTZGESETZ</b></p>	<ul style="list-style-type: none"> <li>● <b>Exclusion of liability</b> Whistleblowers and Protected Persons shall not be held legally responsible for obtaining or accessing information that they have reported or disclosed, unless the obtaining or accessing of such information constitutes a criminal offence in its own right.  Whistleblowers and Protected Persons shall not violate any restriction on disclosure and shall not be held legally responsible for the disclosure of information made in the course of a report or disclosure, provided that they had reasonable grounds to believe that the disclosure of the information was necessary to detect an offence.</li> <li>● <b>Compensation after retaliation</b> In the event of a breach of the prohibition of reprisals, the perpetrator is obliged to compensate the Whistleblowers and Protected Persons for the resulting damage.  An offence against the prohibition of reprisals shall not give rise to any entitlement to the establishment of an employment relationship, a vocational training relationship or any other contractual relationship or to career advancement.</li> </ul>
<p style="text-align: center;"><b>UK</b></p>	<ul style="list-style-type: none"> <li>● UK Laws requires employers to refrain from dismissing workers or subjecting them to any other detriment because they have made a protected disclosure to: <ul style="list-style-type: none"> <li>- The worker's employer;</li> <li>- The person responsible for the relevant failure;</li> <li>- Legal advisers;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- Government Ministers;</li> <li>- A person prescribed by an order made by the Secretary of State (see <b>Annex 1</b>);</li> <li>- A person who is not covered by the list above, provided certain conditions are met with the conditions being varied in exceptionally serious cases.</li> </ul>
<p style="text-align: center;"><b>POLAND:</b></p> <p><b>USTAWA O OCHRONIE SYGNALISTÓW</b></p>	<ul style="list-style-type: none"> <li>● <b>Protection against retaliation</b></li> </ul> <p>Whistleblowers are protected from punitive actions, such as dismissal, changes in the terms of their employment contract, or other forms of discrimination in the workplace. If the whistleblower suffers these actions because of reporting, he or she can obtain compensation for the damages suffered.</p> <ul style="list-style-type: none"> <li>● <b>Confidentiality of identity</b></li> </ul> <p>The identity of the whistleblower must be kept secret, thus ensuring anonymity during the whistleblowing process, unless the whistleblower explicitly chooses to disclose it.</p> <ul style="list-style-type: none"> <li>● <b>Legal protection</b></li> </ul> <p>The whistleblower will not be prosecuted or penalized for disclosing information, provided that the information was provided in good faith and with the intent to report a legal violation. Protection is also provided for breach of confidentiality, subject to disclosure of state secrets or other classified information.</p> <ul style="list-style-type: none"> <li>● <b>Support measures</b></li> </ul> <p>Whistleblowers may benefit from legal and psychological support, which includes counseling on handling the report and protecting their rights.</p> <ul style="list-style-type: none"> <li>● <b>Financial assistance</b></li> </ul> <p>In exceptional cases, the whistleblower may be eligible for financial support, assessed according to the specific circumstances.</p>
<p style="text-align: center;"><b>FRANCE:</b></p> <p style="text-align: center;"><b>LOI SAPIN II</b></p>	<ul style="list-style-type: none"> <li>● <b>Protection against retaliation</b></li> </ul> <p>Whistleblowers are protected from any form of retaliation, such as dismissal, forced transfer, demotion, or any other form of discrimination in the</p>

	<p>workplace. If these protections are violated, the whistleblower has the right to seek compensation for damages suffered.</p> <ul style="list-style-type: none"> <li> <b>Confidentiality</b> <p>The identity of the whistleblower must be kept confidential unless there is explicit consent to disclose it. This ensures that the whistleblower can remain anonymous throughout the reporting process.</p> </li> <li> <b>Protection for the whistleblower from legal harm</b> <p>Whistleblowers are not held liable for disclosure of information, provided the report is made in good faith and with the intent to disclose a violation of law. They cannot be prosecuted for breach of confidentiality or other legal restrictions if these do not involve classified information or state secrets.</p> </li> <li> <b>Support and resources for the whistleblower</b> <p>French authorities, such as the HATVP (Haute Autorité pour la Transparence de la Vie Publique) and the CNIL (Commission Nationale de l'Informatique et des Libertés), provide practical and legal support to help whistleblowers navigate the legal system and protect their rights during the reporting process.</p> </li> </ul>
<p><b>PORTUGAL: LEY 93/2021</b></p>	<ul style="list-style-type: none"> <li> <b>Protection against retaliation</b> <p>Whistleblowers are protected from any form of retaliation, such as dismissal, suspension, demotion, reassignment, negative performance evaluations, or any other adverse treatment in the workplace. Any such acts occurring within two years of the report are presumed to be retaliatory. Whistleblowers have the right to claim compensation for both material and non-material damages and may request interim protective measures to prevent harm.</p> </li> <li> <b>Confidentiality</b> <p>The identity of the whistleblower must be kept strictly confidential and may only be disclosed if required by law or court order. Prior notice must be given to the whistleblower unless it would compromise ongoing investigations. Confidentiality also extends to individuals mentioned in the report and third parties involved.</p> </li> </ul>

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- **Protection for the whistleblower from legal harm**

Whistleblowers are not held liable for reporting or disclosing information covered by official, professional, commercial, or industrial secrecy, or for defamation or breach of confidentiality, provided that the report is made in good faith, based on reasonable belief, and the information was lawfully obtained. Legal immunity does not apply to classified information or criminal acts committed to obtain the information.

- **Support and resources for the whistleblower**

Portuguese authorities provide legal protections and guidance to whistleblowers, including certification of whistleblower status when requested. The Direção-Geral da Política de Justiça offers accessible resources via the Justice Portal (<https://justica.gov.pt>), including information on whistleblower rights, protection measures, and access to legal aid.