



"MODERN SLAVERY ACT" POLICY
OF
LASTMINUTE.COM GROUP

This "Modern Slavery Act" policy ("**MSA Policy**") was proposed by the board of directors of Lastminute.com N.V. (the "**Company**") on 12 July 2017 and refers as to the Company and to any subsidiary belonging to the relevant lastminute.com corporate group (the "**Group**")

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Group has a zero-tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.2 The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Company expects that its suppliers will hold their own suppliers to the same high standards.
- 1.3 MSA Policy applies to all persons working for the Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (the "**Recipients**" or each "**Recipient**").
- 1.4 MSA Policy does not form part of any employee's contract of employment and the Company may amend it at any time.

2. RESPONSIBILITY FOR MSA POLICY

- 2.1 The directors of the Company have overall responsibility for ensuring that MSA Policy complies with the Group's legal and ethical obligations, and that all those under its control comply with it.
- 2.2 The legal department of the Group has primary and day-to-day responsibility for implementing MSA Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing



internal control systems and procedures to ensure they are effective in countering modern slavery.

- 2.3 Management of the Group at all levels is responsible for ensuring those reporting to them understand and comply with MSA Policy and gives adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 Recipients are invited to comment on MSA Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the relevant inline manager and/or to the legal department of the Group.

3. COMPLIANCE WITH THE POLICY

- 3.1 Recipients must ensure that they read, understand and comply with MSA Policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of the Group's business or supply chains is the responsibility of all those working for the Group or under its control. Recipients are required to avoid any activity that might lead to, or suggest, a breach of MSA Policy.
- 3.3 Recipients must notify their manager as soon as possible if they believe or suspect that a conflict with MSA Policy has occurred, or may occur in the future.
- 3.4 Recipients are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Group's business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If a Recipient believes or suspects a breach of MSA Policy has occurred or that it may occur, he/she must notify his/her manager or report it in accordance with the Group's whistleblowing policy as soon as possible.
- 3.6 If a Recipient is unsure about whether a particular act, the treatment of workers more generally, or his/her working conditions within any tier of the Group's supply chains constitutes any of the various forms of modern slavery, he/she has to raise it with his/her manager.
- 3.7 The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under MSA Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a Recipient believes that he/she has suffered any such treatment, he/she should inform the compliance



manager immediately. If the matter is not remedied, and the Recipient is an employee, he/she should raise it formally using the Company grievance procedure, i.e. contacting the Corporate Secretary at corporate.secretary@lastminute.com.

4. COMMUNICATION AND AWARENESS OF MSA POLICY

- 4.1 Training on MSA Policy, and on the risk the relevant business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Group, and regular training will be provided as necessary.
- 4.2 The Group's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF MSA POLICY

- 5.1 Any employee of a company belonging to the Group who breaches MSA Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 The Group companies may terminate their relationship with other individuals and organisations working on its behalf if they breach MSA Policy.

Exclusively on behalf and to the benefit of the Group, any amendment is subject to a case by case prior approval by the Legal Department, which shall reserve the right to propose any linked item to the Company's board of directors' formal approval.

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