

**Policy on bilateral contacts  
with shareholders**

of

**lastminute.com NV**  
(the “Company”)

## INTRODUCTION

This policy on bilateral contacts with shareholders (the “**Policy**”) was adopted by the board of directors of the Company (the “**Board of Directors**”) on 13th May 2022 pursuant to best practice provision 4.2.2 of the Dutch Corporate Governance Code dated 8th December 2016.

The purpose of bilateral contacts is to explain the strategy and the performance of the Company and to ensure that correct and appropriate information is provided about the Company.

## GENERAL

The Company is committed to maintaining an open and constructive dialogue with shareholders and continuously strives to improve its shareholder relations. The Company’s aim is to keep shareholders updated by informing them clearly and accurately about strategies, performances and developments that could be relevant to investors’ decisions.

The Company issues information for the purpose of transparency via reports, presentations and press releases on its website <https://corporate.lastminute.com/>.

## BILATERAL CONTACTS WITH SHAREHOLDERS

Conversations with shareholders mainly take place during the annual general meetings of shareholders, but may also be held on a bilateral basis or in small groups.

The Company reserves the right, at its discretion, to accept invitations from shareholders or from parties representing shareholders and to enter into such dialogue, taking into consideration all reasonable requests. The initiative to enter into a conversation with a shareholder can also be taken by the Company.

The Company may request the shareholder to provide written information prior to a bilateral conversation, in order to assess whether a conversation outside an annual general meeting of shareholders would be of interest to the Company. This information may include further clarification on his views, objectives and/or short or long term investment intentions, the matters to be discussed, the opinion of the shareholder on these matters and information in respect of the shareholder and its interest in the Company.

During these dialogues, the Company is represented by its Investor Relator. However, one or more members of the Board of Directors or the senior management of the Company can decide to accompany the Investor Relator.

When the Investor Relator (or any other representative of the Company) communicates bilaterally with a shareholder, either in person, by telephone, by video or webcast, in writing or otherwise, he must ensure that no non-public information is disclosed at any time.

If a non-public information is accidentally disclosed during bilateral contacts with a shareholder, the Company will publish this information as soon as possible, in accordance with applicable laws and regulations. The shareholder to whom this non-public information has been disclosed unintentionally shall be bound by strict confidentiality and by an undertaking not to trade in shares of the Company until the Company has disclosed this information through a press release.

The Company does not hold meetings related to insider information with any shareholders during the Blackout Periods (for the relevant definition, please see the Insider Trading Summary on the Company's website).

For any requests for contact with the Company or any questions about this policy or in relation to the Company's shares, strategy, activities or financial results, please contact the Investor Relator at [investor.relations@lastminute.com](mailto:investor.relations@lastminute.com).