
Human Rights policy of lastminute.com

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1. OBJECTIVES

Respect for human rights is a fundamental value of lastminute.com group ("**lastminute.com**" or the "**Group**"). lastminute.com is committed to respecting and promoting the human rights of all the people directly or indirectly impacted by our activities.

The commitments set out in this human rights policy (the "**Policy**") support the principles established by lastminute.com's code of conduct (the "**Code of Conduct**").

Through the Policy, lastminute.com embraces and renews its commitment to respect, protect and promote fundamental human and environmental rights and intends to provide to all employees as well as to all stakeholders the principles and guidelines that must be followed to ensure the safeguarding of human rights.

The Policy was adopted by the board of directors of lastminute.com N.V. (the "**Company**") on 18/12/2023 and refers to the Company and to any subsidiary belonging to lastminute.com according to each local legislation.

2. REFERENCES USED

The Policy is inspired by the principles set forth in the [Code of Conduct](#).

In drafting the Policy and defining its commitments, the latter was taken into consideration, together with the laws and regulations of the countries in which lastminute.com operates, as well as the following principles/guidelines issued by relevant international organizations:

- *International Bill on Human Rights* (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
- *United Nations ("UN") Guiding Principles on Business and Human Rights* and the *UN Global Compact Ten Principles*;
- *International Labour Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work and Conventions*;
- *Organization for Economic Co-operation and Development ("OECD") Guidelines for Multinational Companies*;
- *UN Convention on the Rights of the Child*;
- *UN Convention on the Elimination of all forms of Racial Discrimination*;
- *Convention on the Elimination of all forms of Discrimination against Women*;
- *Convention against Torture and other cruel, inhuman or degrading treatment*;
- *Convention on the Protection of the Rights of Persons with Disabilities*;
- *Convention for the Protections of all persons from enforced disappearance*;
- *Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)*.

3. HUMAN RIGHTS COMMITMENTS

Inspired by the principles set forth in the referenced documents listed above, lastminute.com is committed to:

3.1 Rejection of forced and compulsory labor

lastminute.com rejects – and is committed to the elimination of – any form of forced or compulsory labor.

lastminute.com respects the rights of its employees, as well as the rights of children and young workers, prohibiting exploitation under any circumstances, including all forms of modern slavery and trafficking. All employment relationships must be voluntary in nature. No one shall be subject to torture or to inhuman or degrading treatment or punishment.

3.2 Effective abolition of child labour

We condemn any work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. This is any work that is mentally, physically, socially or morally dangerous and harmful to children and/or interferes with their schooling.

A child means every human being below the age of 18 years, unless under the law applicable to the child, majority is attained earlier. However, not all under-18s must be prevented from accessing the work environment: national legislation may promote specific initiatives and opportunities for young people to approach the labour market as a means of training before they reach the prescribed minimum age for admission to employment. Such initiatives are not prohibited, provided that they are carried out explicitly in the interest of the trainee, in strict compliance with all safety requirements and under the principles and guidelines issued by the organizations mentioned in Chapter 2.

No person under the age of 15 shall be employed, except in countries where national legislation permits a minimum working age of 14, in accordance with ILO Convention no. 138. Under no circumstances shall persons under 18 be employed in hazardous work or in roles that may compromise their physical or psychological wellbeing.

3.3 Health and safety

lastminute.com is committed to safeguarding the health and safety of its workforce, preparing and adopting necessary and appropriate measures aimed at ensuring compliance of our offices to the best standards of health, safety and hygiene. The Group guarantees compliance with safety requirements of the electronic equipment supplied in case of remote working without prejudice to more restrictive requirements set forth by local jurisdictions. lastminute.com also promotes the dissemination and reinforcement of a health and safety culture within its organization, in particular by raising awareness on health and safety-related risks and fostering responsible behaviors of all employees, also through awareness-raising campaigns and training activities.

3.4 Freedom of association and collective bargaining

lastminute.com recognizes the value of collective bargaining as an essential instrument for determining the contractual conditions of its employees and regulating relations between management and labor unions. It also acknowledges the right of employees to establish and take part in organizations aiming to defend and promote their interests, to be represented by labor unions or by other forms of

representation elected in accordance with the legislations and practices in force in the different countries where they are employed.

3.5 Diversity and non-discrimination

lastminute.com believes that diversity represents a source of creativity, enrichment and innovation, and rejects any form of discrimination.

Moreover, lastminute.com is careful to develop an inclusive approach in which all differences are taken into consideration and valued, so that everyone is given the opportunity to be themselves. In this respect, lastminute.com is committed to spread a culture of equality and ensures equal opportunities at all levels of the organization.

lastminute.com works to develop and maintain workplaces that are free from any kind of discrimination or harassment on the basis of race, sex, national or social origin, ethnicity, language, religion, age, disability, sexual orientation, gender identity or expression, labor unions' membership, political opinion or any other status protected by applicable laws.

lastminute.com takes care to ensure that current and potential employees are treated with respect for diversity and to promote equal opportunities, both upon establishment of the employment relationship and at each stage of its performance.

3.6 Anti-harassment and fair treatment

lastminute.com has zero-tolerance for any form of abuse, harassment, discrimination, threat, intimidation, bullying or humiliating behavior able, even potentially, to jeopardize the dignity or psychological well-being of a person, whether in the form of verbal comments, physical, sexual, psychological conducts or gestures constituting an abuse of power.

Furthermore, we promote a healthy work-life balance and respect employees' right to rest and recharge.

3.7 Fair wages and benefits

lastminute.com is firmly committed to gender equality, ensuring equal value of work and equal remuneration for all employees.

In order to respect the principle of equal remuneration, compensation policies are designed to be fair, objective and accountable.

lastminute.com compensates its employees guaranteeing wages and benefits that are equal or superior to the minimum requirements set by the applicable laws and regulations, as well as collective bargaining agreements, and that are in line with market practices and consistent with their skillset, seniority and performance.

lastminute.com ensures that the conditions of the working day, overtime, vacation and permissions are fair and non-discriminatory, in compliance with all applicable laws and industry standards on overtime, holidays or benefits required by law.

3.8 Environmental sustainability

lastminute.com believes that human rights and environmental rights are closely interlinked. Internal measures are in place to reduce the direct environmental footprint, and also encourage partners and suppliers to do the same. The Group is also working on raising awareness of environmental concerns in the travel industry within the customer base and the wider community. For more information on the ongoing efforts, please see the sustainability section on the [corporate website](#).

4. CHILD LABOUR IN THE SUPPLY CHAIN

In line with the objectives and commitments outlined above, we are firmly committed to preventing the use of child labour in any form, not only in our operations but also across our global supply chain. We expect our suppliers to:

- Explicitly prohibit child labour in their own operations and in their supply chains in line with the international standards referred to in Chapter 2 of this Policy, as well as comply with local/national labour laws on minimum working age;
- Have robust systems in place to verify the age of workers;
- Monitor their own operations and those of their subcontractors for risks of child labour;
- Immediately notify lastminute.com of any actual or suspected child labour incidents; and
- Cooperate in any investigation, remediation efforts, or audits initiated by lastminute.com.

These expectations are integral to our supplier due diligence process and are aligned with the obligations set forth in our Supplier Terms and Conditions. Suppliers are required to comply with both this Human Rights Policy and our Supplier Terms and Conditions as a condition of doing business with lastminute.com.

4.1 Risk-based due diligence process

At lastminute.com, we are developing a structured, risk-based due diligence process to identify, assess, and address potential risks of child labour in our supply chain.

As a first step, we are classifying our existing supplier base using the UNICEF Children's Rights in the Workplace Index 2023, assigning suppliers into three risk categories: Basic, Enhanced, and Heightened risk. Our current focus is on conducting due diligence on suppliers operating in countries identified as Enhanced or Heightened risk.

lastminute.com provides a secure and accessible reporting mechanism through which concerns related to child labour - or any other potential violation of this Policy - can be reported confidentially and, if preferred, anonymously. This mechanism is available to both employees and external stakeholders and is further detailed in Chapter 7 of this Policy.

We are committed to promptly following up on specific indications of child labour. Where incidents are identified, appropriate measures will be taken to avert or mitigate any negative impact on affected children, which may include supplier engagement, corrective action plans, or collaboration with relevant child protection organisations. The effectiveness of these measures is evaluated through follow-up

assessments, and the results are transparently communicated in our annual Child Labour Due Diligence Report which is publicly available on our corporate website.

5. TRAINING & COMMUNICATION

All employees are required to know and understand the importance of acting in compliance with the Policy.

In this respect, the Policy is disseminated by lastminute.com both internally, through communication and training programs, and externally, through its publication in the corporate website and, where applicable, the dissemination with third parties.

6. GOVERNANCE

The Ethics and ESG committee (the “**Committee**”) is responsible for overseeing and approving the sustainability strategy of lastminute.com, taking into consideration the obligations arising from applicable regulations. The Committee is composed of at least two members, annually appointed by the board of directors of the Company. This structure allows the escalation of priorities and concerns directly to the most senior level of the Company.

lastminute.com since 2022 has created a team dedicated to elaborate and update the Group sustainability strategy, which leads sustainability policies and programmes, and is responsible for their implementation. The team periodically reports the strategy implementation progresses to the Committee.

The creation and maintenance of the Human Rights policy is under the responsibility of the Sustainability and Public Affairs team, which is supported by the Legal team to ensure adherence to applicable regulations and international conventions. The Policy implementation is managed in close collaboration with other group functions including the Risk Management & Control and the Internal Audit teams.

The Group reports annually on its progress and continuous efforts related to Human Rights in the lastminute.com Group Sustainability Report.

7. MONITORING, IMPROVEMENTS AND CONTROLS

The Risk Management, Information Security & Controls team will periodically review the Policy and monitor its implementation on a continuous basis. Human rights related risks are included in our internal risk management, building the basis for a process to effectively identify, prevent, mitigate and account for any potential breaches.

lastminute.com is in the process of building a robust due diligence system, including the assessment of actual and potential human rights impacts within the Company and its direct stakeholders. This will allow an immediate response to findings, track responses, and communicate how impacts are addressed.

In addition, the Internal Audit team may be requested to perform independent audits in order to assess the full compliance of established practices with Policy guidelines and requirements.

lastminute.com encourages employees and, more generally, all stakeholders to report any violation of the Code of Conduct and, in particular, any possible unlawful conduct that constitutes, or may constitute, a violation of human rights and/or the Policy. We have an Integrity Helpline in place that allows raising a suspicion, concern or violation of the Code of Conduct or illegal behavior in a confidential

and/or anonymous manner. This can be done through a web based platform, that consists of two channels:

1. The Whistleblowing platform (accessible by employees and external stakeholders), used for reporting violations of the Code of Conduct or illegal behavior and severe misconduct like harassment, discrimination, bribery and corruption, as well as unfair competition and violation of consumer protection regulations and any other type of offence and/or crime, as per the [Whistleblowing Policy](#). The direct access to the whistleblowing platform is given [here](#).
2. The Inquiry Form (accessible by employees only), used for asking questions regarding potential violations of the Code, raising concerns about ethical dilemmas, and to ask for support to define suitable actions to be taken.

Furthermore, the need to comply with Human Rights standards has been highlighted in the Terms and Conditions, signed by all partners and suppliers, who are expected to meet the same standards as set for the Company itself.

8. DISCIPLINARY MEASURES

lastminute.com shall use every reasonable action to prevent and discourage any conduct in violation of human rights and the Policy, as well as sanction any misconduct by its employees and interrupt commercial agreements with suppliers and other third parties violating the above mentioned human rights principles and commitments.