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# Health and Safety Group Policy of lastminute.com

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## 1. GENERAL OBJECTIVE OF THE POLICY

lastminute.com considers ensuring the health and safety of everyone involved in business activities crucial. This policy underscores our commitment to ensuring a safe workplace, secure equipment, and providing necessary information and training for employees, visitors, contractors, and all individuals within our workspaces. The Group maintains a zero-tolerance stance towards health and safety risks and trying to exceed legal compliance is our goal. The Group Policy contains vital health and safety information. There is a shared responsibility to prevent harm at work. This Policy provides guidance for managing health and safety and applies to all employees, guests, visitors, and other individuals interacting with our premises.

In this regard, each Legal entity<sup>1</sup> of the Group must:

- Fully **adopt this policy**;
- Formalise a **specific procedure** to ensure compliance with local legal requirements (with the support of subject matter experts such as external consultants, if necessary);
- In accordance with the specific procedure formalised, formulate and fill out an **operational checklist**, which has to list recurring control activities to be conducted to guarantee the full compliance with H&S local legal requirements. Relevant **supporting documents** and **evidence** should be archived for future reference.

The Group, supported by the Internal Audit Team, will periodically conduct audit activities over the control principles included in such checklists, assessing and reviewing that defined controls are in place and functioning.

### Eventual additional alignment with:

- [Smart Working, Hybrid Working Policy - Global \(excluding employees with a G Permit\)](#) for defining safety measures in diverse work environments.
- [Hybrid Working Policy Chiasso](#), establishing structured guidelines for employees based in Chiasso, balancing remote and in-office work while maintaining productivity, collaboration, and adherence to health and safety protocols.
- [Hybrid Working Policy for Shift Workers](#), addressing the unique challenges of shift-based roles by implementing hybrid work models that consider operational needs, employee well-being, and regulatory constraints.

## 2. COMMITMENT OF THE GROUP

Setting and adopting high health and safety standards is a fundamental goal for the Group, and to achieve this, we constantly strive to:

- Ensure adequate and recurring control of risks arising from our work activities;
- Provide and maintain safe equipment;
- Ensure the safe handling and use of substances;

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<sup>1</sup> The specific procedures must be drafted by offices with physical spaces, those adopting a hybrid working model, and even those operating fully remotely without physical offices.

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- Provide information, instruction, and supervision to employees;
  - Support employees in case of need (e.g., parking space near the office in case of pregnancy, whenever is possible);
  - Ensure that all employees are enabled to perform their work safely and provide them with appropriate training;
  - Try to prevent work-related incidents;
  - Maintain safe and healthy working conditions;
  - Promote a culture of safety in the workplace by encouraging compliance with mapped risks and resulting mitigation plans in occupational health and safety;
  - Conduct regular inspections and assessments of the workplace to identify and correct potential health and safety risks;
  - Integrate health and safety matters into strategic business decisions, including investments, infrastructure, training, and staff.

This commitment extends beyond physical safety to include the security of tools and resources used daily by employees. The [IT SECURITY, LMNSEC011 Personal Computer Security Management Policy](#), for instance, ensures that the devices employees use meet security and operational standards, preventing risks that may arise from compromised technology. Similarly, safe work practices defined in [PCI-DSS Information Security Policy](#) support the secure handling of sensitive information, contributing to a safer and more reliable work environment.

### 3. RESPONSIBILITIES

Our Group has a legal obligation to safeguard the health, safety, and well-being of its employees and all individuals involved in our business activities, including contractors, visitors, etc. To fulfill these requirements, everyone pledges to:

- Adhere to the key principles described in this health and safety policy;
- Periodically assess H&S risks that may have an impact on anyone involved in our business activities;
- Effectively plan, organise, control, monitor, and review all preventive and protective measures related to health and safety.

Specific responsibilities in health and safety have been assigned to the following parties:

#### 3.1 Executives members

The responsible persons in the various countries, who may vary depending on local regulations, are ultimately accountable for matters related to health and safety within their respective areas of responsibility. They must ensure that:

- Health and safety standards are adhered to;
- Adequate resources are allocated to fulfill health and safety requirements;

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## 3.2 Directors

The Company's Directors are responsible for demonstrating their commitment to health and safety goals, including those within their areas of responsibility. To this end, they are committed to:

- Assigning responsibilities related to health and safety;
- Ensuring adherence to our health and safety standards;
- Health and safety performance undergoes regular review, identifying areas for development and taking necessary measures;
- Seeking competent advice to minimise risks and develop safe work practices;
- Monitoring the efficacy of measures taken and making necessary improvements.

To effectively fulfill these duties, Directors can refer to the [Smart Working, Hybrid Working Policy for Shift Workers](#), which outlines practices for ensuring safety for employees working under flexible arrangements, and the [Full Remote Working Policy](#), which guides maintaining safety standards for remote teams.

## 3.3 Managers

Managers and supervisors take responsibility for the well-being and safety of the employees they supervise. The Company is committed to providing them with the requisite health and safety information, guidance, and training to execute their roles competently.

Furthermore, they are tasked with ensuring that employees within their jurisdiction:

- Receive adequate training and possess the necessary skills to perform their duties safely;
- Promptly report any health and safety risks.

## 3.4 Employees (also temporary)

The Company must inform employees or their representatives regarding health and safety matters. The Group values transparent communication to clarify our approach to health and safety, enabling employees to provide feedback and voice concerns. Communication and consultation methods may include:

- Adhere to health and safety policies and procedures;
- Attend periodic medical check-ups, where required by local regulations
- Conduct themselves responsibly during work hours;
- Properly use safety equipment;
- Notify a manager of any safety hazards or equipment malfunctions;
- Report all incidents to the managers, regardless of whether an injury occurs;
- Complete all required health and safety training;
- Familiarise themselves with the emergency evacuation procedure.

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### 3.5 Visitors/Members of the Public

All visitors and Members of the Public on our premises must observe our health and safety rules and take responsibility for their own and others' well-being. An internal employee will accompany them, ensuring they receive pertinent health and safety induction.

### 3.6 Contractors

Contractors must comply with all Company health and safety policies, procedures, and instructions while working on our premises. They are responsible for promptly reporting any issues that could impact their safety or others to the relevant Company manager (Managers or Directors).

## 4. COMMUNICATION AND CONSULTATION

The Company must inform employees, or their representatives, regarding health and safety matters. The Group values transparent communication to clarify our approach to health and safety, allowing employees to provide feedback and voice concerns. Communication and consultation methods may include:

- Individual discussions on health and safety issues;
- Distributing information through internal publications, Slack chat "emergency", Workvivo, the company Handbook, etc.;
- Holding health and safety staff meetings;
- Organising dedicated health and safety meetings involving management and employee representatives.

The Company is committed to ensuring that communication channels remain accessible, including during remote or hybrid working scenarios. For example, the [Internet Network and Equipment Usage Policy](#) provides guidelines for secure digital communication, which is vital for maintaining clear and effective communication in virtual environments.

## 5. GENERAL HEALTH AND SAFETY PROVISIONS

The following provisions summarise key aspects of the Group's commitment to occupational health and safety issues, underscoring our dedication to promoting a safe and healthy work environment for all individuals, whether internal or external parties interacting with lastminute.com facilities.

### 5.1 H&S training

The Company is committed to providing comprehensive information, instruction, and training to all employees, ensuring they can perform their duties safely. Mutually with initial induction training at the commencement of employment, employees will receive additional training as necessary.

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## 5.2 Accidents, incidents, and illnesses at work

It's everyone's job to keep everyone safe and healthy. If something goes wrong—like an accident or incident—it must be reported right away by anyone who sees it or is involved. This helps fix the problem and stop it from happening again. All accidents and incidents must be reported by law to the Health and Safety Responsible. We also need to communicate about near misses, meaning unplanned events that could have resulted in an injury, illness, damage, or loss, but by chance or timely intervention, harm was avoided. By identifying and analysing near misses, the Company can take proactive measures to prevent similar incidents from occurring and improve overall safety.

## 5.3 First aid procedures

The Company is committed to ensuring a safe and secure working environment for all its employees as well as visitors and contractors. To this end, the Group is implementing additional measures to enhance readiness and response capability in case of medical emergencies.

Furthermore, lastminute.com is also committed to training an adequate number of employees in first aid procedures, including the usage of defibrillators (when the number of employees requires it).

## 5.4 Safety in the use of electricity and electrical equipment

The Company will ensure that all reasonable measures are taken to prevent employees from being exposed to electrical hazards and to maintain and operate electrical equipment safely.

## 5.5 Ergonomics and workstation management

The Company is committed to organising workspaces following ergonomic principles to prevent injuries and enhance employee comfort.

## 5.6 Management of toxic/harmful materials

The Company will implement appropriate measures to ensure the safety of employees who - based on their role - may encounter hazardous substances, such as cleaning chemicals.

## 5.7 Management of Common Areas/Meeting Rooms/Company Events

The Company establishes specific guidelines to ensure safety in common areas, such as meeting rooms, break areas, and other shared spaces. This includes implementing appropriate safety measures, such as regular maintenance, cleaning, and safety signage, as well as promoting safe and responsible behavior among employees.

## 5.8 Manual handling

Whenever possible, efforts will be made by the Company to minimise manual handling of loads.

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## 5.9 Disability management in the workplace

The Company is committed to maintaining the health and safety of individuals with disabilities, including employees, visitors, contractors, and members of the public. This includes ensuring adequate space for mobility, ex. accessible elevators and emergency exits for everyone.

## 5.10 Maternity support

The Company understands that during pregnancy and in the first six months after childbirth, employees may need different and/or additional measures to safeguard their health and safety.

## 5.11 Drugs and Alcohol

Alcohol or drugs can significantly impair judgment and reaction times, thereby increasing the risk of accidents and injuries. For this reason, the consumption of drugs or alcohol is strictly prohibited within company premises. For any clarification and for the relevant company policies, please refer to our [Code of Conduct](#).

## 5.12 Smoking

The Company upholds a smoke-free workplace policy in compliance with legal requirements. This policy extends to the use of electronic cigarettes as well.

## 5.13 Employee travel to and from work

The Company is committed to promoting the safety of employees during their commute to and from the workplace. Guidelines and information on road safety and public transportation are provided to encourage the use of safe and sustainable transportation methods. Safe travel behaviors are promoted to ensure the well-being and protection of all employees.

## 5.14 Violent/aggressive behavior

The Company is committed to monitoring and addressing all instances where employees are subjected to violence and aggression, such as verbal abuse while performing their duties.

## 5.15 Travel management related to business trips

The Company ensures employee travel safety by planning trips meticulously, including documentation, insurance, and immunisations, considering personal safety, security, and transportation, and adhering to travel advice, with emergency contact information readily available.

## 5.16 Remote working/hybrid working

Employees working from home are held to the same health and safety standards as those working from the Company premises. This encompasses both employees contracted for remote work and those who do so intermittently.

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### **5.17 Evacuations (earthquake, fire, etc.)**

In the event of an emergency, it's crucial to ensure that everyone takes the appropriate steps to safeguard their safety. Emergencies may include fires, leaks or flooding, severe weather conditions, terrorist threats, or serious accidents.

### **5.18 Work alone**

"Work alone" means a person to whom help cannot be given immediately in the event of an injury or critical situation because, for example, he or she is operating out of eye or voice contact with other people. Although the Group is committed to reducing alone working situations as much as possible, when these cannot be avoided, precautionary measures proportionate to the risk will be taken to protect, as far as reasonably possible, the health and safety of employees, collaborators, and third parties.

### **5.19 Health, services and sanitation**

The Group is obligated to furnish sufficient health, safety, and welfare amenities for employees. This encompasses restroom facilities, washing and changing areas, rest breaks, as well as designated areas for meals and beverages.

### **5.20 Working Hours**

The Group has set the maximum number of hours typically permissible for employees to work. The Company recognises that, in addition to complying with local legislation, everyone is obligated to safeguard the health, safety, and well-being of employees, ensuring that they are not compromised by excessive working hours.

### **5.21 Cases of new pandemics**

Ensuring the safety and well-being of everyone at work is of utmost importance, particularly during a pandemic when serious infectious diseases affect people.

### **5.22 Young persons at work**

A "young person" is defined as an individual under the age of 18. While the Company does not employ individuals in this age group, it recognizes that young persons may occasionally be present in the workplace under specific circumstances, such as educational internships or participation in special events, including "Bring Your Child to Work Day" or school internships. The Company acknowledges that young persons may face increased health and safety risks due to their limited experience, training, or physical and emotional maturity. For this reason, appropriate measures must be taken to ensure their safety and well-being during any activity conducted on Company premises or under Company responsibility.

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## RELATED GLOBAL POLICY AND GUIDELINES

- [IT SECURITY, LMNSEC012 Smart Working Policy](#)
- [IT SECURITY, LMNSEC011 Personal Computer Security management](#)
- [Smart Working, Hybrid Policy for Shift Workers](#)
- [IT SECURITY, LMNSEC025 PCI-DSS Information Security Policy](#)
- [GDPR Policies, LMN001 Internet Network and Equipment Usage Policy](#)
- [Smart Working, Full Remote Working Policy](#)
- [Smart Working, Work from Anywhere Policy](#)
- [Smart Working, Hybrid Working Policy - Global \(excluding employees with a G Permit\)](#)
- [Hybrid Working Policy Chiasso](#)
- [Hybrid Working Policy for Shift Workers](#)