

2024 Modern Slavery Statement

lastminute.com

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INTRODUCTION

The following Modern Slavery statement (hereinafter referred to as the “**Statement**”) outlines the measures LMnext Uk Ltd, its parent company lastminute.com N.V. and all the relevant subsidiaries (hereinafter referred to as “**lastminute.com**” or the “**Group**”) have implemented to prevent, identify, and address risks related to modern slavery, human trafficking, and child labour within our business and network of partners.

This report has been prepared concerning the financial year ending December 31, 2024 and in alignment with Section 54 (1) of the UK “[Modern Slavery Act 2015](#)” (the “**MS Act**”). It provides a comprehensive overview of the steps we have taken to align with legal and ethical standards in our operations, and reinforce our commitment to the eradication of modern slavery, human trafficking, and child labour practices.

OUR GROUP

lastminute.com is a European travel-tech company operating through digital platforms that enable customers to research, compare and book travel services. The Group operates both as an online travel agency (OTA), acting as an intermediary between customers and third-party travel service providers, and as an organiser of travel packages, particularly Dynamic Holiday Packages that combine flights, accommodation and ancillary services in real time. Through its proprietary technology and portfolio of brands, lastminute.com facilitates and organises travel services sourced from a global network of suppliers, including airlines, hotels and other travel partners.

The Group’s value chain spans upstream, own operations and downstream activities. Upstream activities include the sourcing of travel and tourism services (such as transportation, accommodation and ancillary services), as well as technology and digital infrastructure, payment processing, advertising, content management and other corporate support services. Own operations comprise software and product development, platform management, customer care, marketing, payment systems and core business functions such as finance, human resources and procurement. Downstream activities focus on the distribution and sale of travel products to customers through the Group’s digital platforms, working in coordination with travel service providers to deliver the end-to-end travel experience. This value chain structure reflects the asset-light, technology-driven nature of the Group’s business and informs its approach to identifying and managing social and human rights risks, including modern slavery, across its operations and supply chain.

GOVERNANCE AND ETHICAL COMPLIANCE

At lastminute.com, treating people with dignity and respect is a fundamental principle that guides everything we do. Our commitment to Human Rights are rooted in internationally recognized standards, including the United Nations Guiding Principles on Business & Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the ILO Core Conventions. Across all our operations, we strive to identify,

prevent, and address any risks related to Human Rights violations, fostering a culture where ethical business practices are a priority.

As a technology-driven Group, we recognize that the most significant impact of our activities concerns our employees. This awareness drives our continuous efforts to protect and respect their rights, ensuring safe and fair working conditions at every level of our business.

We have a [Code of Conduct](#) in place directed at our employees, that serves as a cornerstone of this commitment. It reinforces our adherence to ethical and legal standards, establishes clear expectations for behavior, provides mechanisms for reporting ethical or legal concerns, and strengthens our ability to prevent and detect wrongdoing. Additionally, it underscores our responsibility to uphold fundamental Human Rights and explicitly prohibits any form of forced labour, child labour, or exploitation within our workforce and supply chain.

Beyond our own employees, we acknowledge our responsibility toward workers in our supply chain. To guide our engagement with suppliers and partners, we introduced a [Human Rights Policy](#) in 2023, building on the principles of our Code of Conduct. This policy outlines our zero-tolerance approach to forced and compulsory labour, child labour, and any form of discrimination or exploitation, extending these expectations to all our business partners, suppliers, and collaborators. These principles are further supported by our [Modern Slavery Act Policy](#), which clarifies the Group's responsibilities in preventing modern slavery and outlines procedures for reporting suspected violations. Additionally, we publish our [Child Labour Due Diligence in the Supply Chain](#) report 2023 and 2024, available on the corporate website of lastminute.com.

Additionally, we strictly enforce legal minimum working age requirements in every country where we operate, ensuring that standardized employment contracts across the Group reflect our ethical and legal commitments.

To learn more about our ongoing initiatives and efforts, we invite you to explore Chapter 10 of our 2024 Sustainability Report. This report offers an in-depth look at our progress in this area.

RISK MANAGEMENT AND DUE DILIGENCE

We have a rigorous supplier selection process in place, overseen by our Global Procurement Team and the Purchasing Process Policy and Procurement Procedure. These guidelines define the supplier selection criteria and contractual conditions and ensure compliance with applicable regulations, including the GDPR framework.

The selection process involves cross-functional collaboration between Global Procurement, the Business Owner, and the Legal and Data Protection teams. As part of our due diligence, suppliers are assessed based on criteria such as honesty, integrity, compliance, and confidentiality. Each supplier is analysed by considering multiple risk factors, including

compliance risk, country risk, credit risk, reputational risk, and information technology risk, in line with the Supplier Management Policy. Additionally, our core suppliers are market leaders, which significantly reduces the associated risks, ensuring higher levels of reliability and compliance.

In 2023, we enhanced this process by embedding a dedicated Environmental, Social, and Governance (ESG) section in our suppliers' Terms and Conditions (T&Cs), which outlines expectations regarding labour practices, worker safety, non-discrimination, and freedom of association.

Key clauses in our T&Cs prohibit both forced and child labour. Specifically:

- **Prohibition of forced labour:** the provider shall not tolerate, participate in, or benefit from any form of forced labour, including bonded labour, servitude "for debt", forced prison labour, slavery, or human trafficking. All employment is voluntary, and all workers are free to leave their jobs at any time or terminate their contracts.
- **Prohibition of child labour:** the provider does not tolerate, partisan, or participate in the use of child labour. The term "child" refers to anyone who is under the age of 15 (or 14 if permitted by the national law in question), who is not of the age to complete compulsory education, or who is not of the minimum age to work in the country in question.

Although the majority of our goods and services are sourced from low-risk regions in Europe, we continue to adopt a precautionary approach. Our template contracts used across the Group contain a specific Human Rights clause explicitly prohibiting child labour, reinforcing our commitment to ethical sourcing.

These measures remain central to our overall child labour due diligence framework and are regularly reviewed to ensure they remain fit for purpose as part of our broader risk mitigation strategy

Human Rights risk assessment

lastminute.com is adopting an increasingly structured and responsible approach to supplier management, with a particular focus on respecting human rights and labour conditions throughout the supply chain. To this end, we launched an in-house risk assessment process in 2023 and 2024:

Preliminary Assessment (2023): This assessment identified suppliers located in medium- to high-risk countries for child labour and workforce exploitation (classified as *Enhanced* or *Heightened* risk according to the Children's Rights in the Workplace Index, UNICEF (June 2023)). This initial screening allowed us to conduct a detailed evaluation of the most critical areas.

Based on this analysis, a defined number of partners were selected for further review in the second phase.

Risk Assessment of Tier 1 Suppliers (2024): We developed a questionnaire focused on gaining a better understanding of the risk of child labour in our existing supply chain. Via the questionnaire, we request information on human rights policies or public commitment prohibiting child labour, information on the minimum employment age, information on the size of their workforce, whether they have a due diligence system and controls for the prevention of child labour in place, and whether they have recorded any incidents. This questionnaire was sent to suppliers identified in the preliminary assessment phase as being based in countries of *Enhanced* risk (we currently do not engage in any collaborations with vendors based in *Heightened* risk countries).

For more details on the risk assessment process and results, please refer to our [2024 Child Labour Due Diligence](#) report. While the first focus was on Child Labour risks in our supply chain, we will widen the scope to include Modern Slavery Risk indices for the evaluation in 2025.

Creation of the Corporate Liability Model

The Corporate Liability Model (hereinafter referred to as the “**Model**”) in development by the Group is a key tool designed to ensure an effective control system, prevention, and governance. It serves as a framework aimed at protecting lastminute.com from risks associated with offenses committed by individuals or legal entities acting on its behalf. Its primary goal is to establish an internal control system capable of preventing, detecting, and managing unlawful behavior, thereby safeguarding the organization both legally and reputationally.

In particular, the Model places significant emphasis on crimes against the individual, such as human trafficking and child exploitation, which are areas of critical ethical and social importance. Human trafficking involves the recruitment, transportation, transfer, harboring, or receipt of people through the use of force, coercion, or fraud, with the intent to exploit them for purposes such as forced labour or prostitution. Child exploitation, on the other hand, refers to the use of minors in illegal or harmful activities that violate their fundamental rights, such as child labour in supply chains or involvement in sexual exploitation.

The Model is based on a structured set of rules, protocols, and oversight mechanisms that aim to identify, prevent, and mitigate risks related to potential regulatory violations. It ensures a transparent, ethical, and legally compliant work environment and takes into account the strictest regulations applicable across the Group’s jurisdictions, ensuring a cohesive and integrated regulatory framework.

The full implementation and operation of the Model are expected to be adopted towards the end of 2025. However, to ensure its continuity, effective implementation, and ongoing updates, lastminute.com N.V.’s board of directors resolved to establish a supervisory body (hereinafter referred to as the “**Supervisory Body**” or “**Body**”), effective from January 1st, 2025. The Body is responsible for monitoring the effectiveness and application of the Model, proposing any necessary updates and improvements in line with regulatory and organizational developments.

The Supervisory Body currently consists of two members, each with a distinct role: one has an operational and managerial function, overseeing organizational aspects and the practical application of the model, and the other has an independent and strategic position, befitting of their role as Non-Executive Director of lastminute.com N.V., ensuring impartial oversight and a high-level perspective on the evolution of the control system.

MEASURES TO PREVENT, MITIGATE, AND REMEDY RISKS

Training and Awareness

Raising awareness and building internal capacity are key components of our strategy to prevent and mitigate human rights risks across our value chain. Ensuring that our employees understand the relevance of these issues to their roles is fundamental to the effectiveness of our due diligence system.

Since 2017, all employees have been required to complete our mandatory modern slavery e-learning module on an annual basis. This training provides a foundational understanding of key concepts such as forced labour, human trafficking, and exploitation, helping to establish a shared baseline of knowledge across the organisation.

Building on this foundation, in 2025 we plan to expand the scope of the e-learning module to cover a broader range of human rights topics beyond modern slavery. This will allow us to retain the knowledge base employees have already developed while deepening their understanding of the wider set of risks and responsibilities relevant to their work.

Our commitment to awareness-raising also extends beyond our internal activities to the wider travel industry, where we aim to drive positive change. In 2023, we launched [Planet Heart](#), an editorial platform dedicated to promoting responsible travel and raising awareness about critical global issues, including child labour and Human Rights in tourism. Through this initiative, we aim to empower our customers to make informed choices that support ethical and sustainable practices. For a deeper insight into this initiative, we invite you to explore Chapter 12 - Customers of the 2024 Sustainability Report, where you will find a more detailed explanation of our efforts in this area.

Reporting Mechanism

All stakeholders are encouraged to report any suspected or actual Human Rights violations through dedicated channels. To facilitate this, we have established the **Integrity Helpline**, a secure web-based platform that provides two distinct channels for raising concerns, both anonymously and confidentially:

- **Whistleblowing Channel** – Available to employees and external stakeholders, this channel is designed to report violations of the Code of Conduct, illegal activities, and serious misconduct. It also serves as a means to raise concerns about potential or actual risks related to child labour. More details can be found in our [Whistleblowing Policy](#).

- **Inquiry Form** – Accessible exclusively to employees, this form is used to seek clarification on possible Code of Conduct violations, voice ethical concerns, and request guidance on appropriate actions.

Anyone who raises a concern in good faith about an ethical or compliance-related issue will be supported by lastminute.com’s management and will not face any form of retaliation. Additionally, all reports received are documented internally in writing, with relevant information provided to the Groups Audit committee and Risk & Finance committee or board of directors, as applicable.

During 2024, lastminute.com recorded zero reported cases of concerns related to Human Rights.

APPROVAL AND SIGNATURE

The Statement has been approved by LMnext UK Ltd’s board of directors (the “**Board**”) on 22 December 2025 by the requirements of Section 54 of the MS Act. The Board, alongside relevant executive leadership, has reviewed and endorsed this Statement as a reflection of the Group’s ongoing commitment to oppose modern slavery within its operations and supply chain.

In compliance with the applicable regulations in the United Kingdom, the Statement will be published on the Group’s website, as required by the MS Act.