



TUI Human Rights Statement

January 2025

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We, TUI AG, and all Group companies managed by TUI AG (collectively “TUI” or “TUI Group”), the world’s largest tourism group, are committed to respecting human rights and environmental obligations within our supply chain throughout our global operations. We consider the protection of human rights to be of fundamental importance. Since 2014, TUI has been a signatory to the 10 universally recognised principles of the UN Global Compact in the areas of human rights, employment law, environmental protection and anti-corruption.

We employ people from all over the world. In addition to our own employees, our diverse business includes an extensive supply chain, with thousands of suppliers in more than 90 countries, from manufacturers of aircraft and cruise ships to hotel laundry services and tour guides, as well as other destination services used by our customers. We comply with applicable laws, fulfil internationally recognised obligations in respect of human rights and the environment and ensure that human rights violations and environmental pollution are prevented in the course of our own business activities as well as those of our suppliers and business partners.

In particular, we condemn all forms of child and forced labour, all forms of slavery, all practices similar to slavery, and all forms of discrimination based on personal characteristics such as national or ethnic origin, social background, gender, sexual orientation, age, religion, beliefs, political opinion, or disability. We believe that everyone should be treated with respect and dignity and are committed to continuously improving diversity and inclusion across our business. We condemn the exploitation of children and are committed to protecting them. TUI Group is an active member of the End Child Prostitution, Child Pornography, and Trafficking of Children for Sexual Purposes (ECPAT) and a signatory to the Code of Conduct for the Protection of Children from Sexual Exploitation in Tourism (The Code). TUI has implemented policies and guidelines in the respective business areas to address this topic throughout its operational activities.

We are also committed to complying with the locally applicable occupational health and safety regulations, paying fair wages, and protecting employees’ rights in respect of freedom of association and collective bargaining.

To strengthen our commitment, we have put in place a number of initiatives to implement business practices that are consistent with our policies and our TUI values: Trusted, Unique, Inspiring. We are strengthening our procurement processes, raising awareness amongst our colleagues and partners improving training and reporting processes in line with the UN Guiding Principles on Business and Human Rights.

We have also developed specific processes for our own business operations and, where necessary, in collaboration with our direct and indirect suppliers. These measures are designed to fulfil our legal

obligations under the German Supply Chain Act (in German: Lieferkettensorgfaltspflichtengesetz, hereinafter referred to as "GSCA") in preventing human rights violations in supply chains.

Our expectations of our employees and suppliers

The principles set out above apply both to our own company, i.e., to all our employees, and to our suppliers in the supply chain. We expect all our employees and suppliers to comply with the applicable laws, our company policies, and our principles and values. To this end, we have developed our Integrity Passport, the Code of Conduct, and our Global Employment Statement, which clearly and comprehensibly set out our expectations of our employees and suppliers. Our Integrity Passport is an integral part of the employment contract and is binding for all our employees. In addition, we expect our suppliers and business partners to also commit to upholding our values and to develop and implement appropriate and effective procedures to address, mitigate, or prevent the risks we have identified and to recognise other potential risks. We expect our suppliers and business partners to cascade our requirements throughout their own supply chain.

In order to transparently communicate our expectations of our suppliers and business partners, we have developed a Supplier Code of Conduct, which is an integral part of supplier contracts, as well as contractual clauses related to environmental and human rights requirements.

TUI Group’s human rights and environmental due diligence obligations

The implementation and continuous execution of human rights and environmental due diligence obligations are based on the afore-mentioned national and international laws, standards, and general conditions.

TUI Group’s due diligence process



Responsibilities and risk management:

TUI's Human Rights Officer: The Human Rights Officer oversees GSCA risk management, assumes overall responsibility for business processes with regard to human rights and environmental due diligence, and reports regularly to the extended Executive Board, the Group Executive Committee (GEC).

Group Sustainability: The responsible employees coordinate the tasks derived from the GSCA across various departments and continually report to the Human Rights Officer. In consultation with other Group functions, they coordinate the implementation of the various appropriate risk analyses, the establishment of the risk management system, and monitor the timeliness of risks and the implementation of appropriate remedial measures. Reporting obligations also fall within this area. In this context, relevant information is collected across the Group, progress and incidents are reported, an annual report is prepared, and future legislation on environmental, social and corporate governance responsibilities are reviewed.

Group Integrity & Compliance, Data Privacy: The team Integrity & Compliance is responsible for setting up an appropriate complaints procedure at Group level and ensuring that the relevant requirements are

met. It is responsible for coordinating the receipt and processing of suspected cases and for contacting and liaising with the relevant departments/entrusted individuals.

Group Legal: The team supports the relevant TUI companies in cooperation with Group Purchasing, Group Procurement, and other relevant departments and TUI companies. Its role is to ensure that legal documents (for example, contractual clauses) comply with legal requirements and are implemented in an appropriate manner.

Group Risk Management: The department provides a uniform risk management methodology across the Group, which is also applied to compliance risks in connection with the GSCA. This process is supported by integrated risk and control software, which enhances transparency regarding risks, controls, measures, competencies and responsibilities. Risks are continuously identified, assessed and processed as part of day-to-day operations.

Human Resources: This area is responsible for managing appropriate risk and remediation processes related to human rights compliance for employees in its own business area. It is also responsible for reporting on progress and cases/remedial actions, developing and delivering training, and developing and implementing the TUI Global Employment Statement.

Occupational Health and Safety: The team is responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures in relation to health and safety issues as well as ensuring that risk identification and control measures are properly documented.

Purchasing and Procurement: These teams are responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures with direct suppliers, reporting on progress and cases, as well as maintaining and updating the risk analysis methodology for the supply chain in collaboration with the Group Sustainability team.

Group Corporate & External Affairs: This team establishes and maintains contact with political decision-makers and authorities in relation to upcoming legislation and ensures close and transparent collaboration with associations in the development of shared positions.

Communications: The communications team is responsible for preparing internal and external communications relevant to the Group in the event of public enquiries, for example from non-governmental organisations or the media, in collaboration with the Group Sustainability team, as well as providing updates and handling internal communications regarding progress.

Group Internal Audit: Group Internal Audit reviews implemented GSCA processes to ensure compliance with controls as well as their appropriateness and effectiveness.

Risk analyses

As part of risk management, appropriate risk analysis are carried out to identify human rights and environmental risks in the company's own business and within the supply chain. Ad hoc risk analyses are initiated in the event of a significant change or increase in the risk situation within the supply chain.

A risk management tool is used to carry out risk analyses. This system offers a comprehensive software solution for the IT-supported implementation of GSCA requirements, enabling risk and supplier management based on GSCA criteria. The software provides a detailed overview of the company's own business area, direct suppliers and, with the appropriate knowledge, indirect suppliers and appropriately maps their specific human rights and environmental risks. Direct suppliers and companies within the company's own business area are entered into the system. Using recognized indices and press releases, an abstract risk is determined for each company and each protected legal position. These risks are categorized as "low", "medium" or "high". Depending on the abstract risk disposition, the concrete risks for individual suppliers are determined in a second step. The specific risk is calculated based on a self-assessment, proof of compliance with audit-based standards, or other findings from the supplier relationship. Individual preventive measures can then be implemented based on the specific risk.

In the course of the risk analyses carried out so far, we have identified various risks to human rights and environmental issues that we consider to be a priority due to their nature and scope as well as their potential significance for the TUI Group. The following risk was identified for our own business:

- Disregard for occupational health and safety and work-related health hazards

The following risks were analysed as a priority for the direct supply chain:

- Unequal treatment in employment
- Disregard of freedom of association and the right to collective bargaining
- Forced labour and all forms of slavery
- Unlawful violation of land rights
- Hiring or use of private/public security personnel that may cause harm due to lack of training or supervision

Based on these risks, appropriate preventive and remedial measures are defined, prioritised, and implemented.

Preventive measures

In order to prevent human rights and environmental risks within our supply chain, TUI has introduced various preventive measures and tools, such as guidelines and processes that set out what we expect from our business partners.

Policies and Statements:

Supplier Code of Conduct: This sets out the standards of ethical behaviour, values and principles we expect from our suppliers. The Supplier Code of Conduct is accessible [here](#).

Integrity Passport - The TUI Code of Conduct: This requires TUI employees to conduct business with integrity and encourages them to report potential or actual violations through the available channels, which include a confidential whistleblowing system (TUI SpeakUp Line). The Integrity Passport is accessible [here](#).

Modern Slavery Act Statement: This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It describes the measures TUI Group has taken to prevent modern slavery and human trafficking throughout its business operations and supply chain. Since 2017, TUI Group has published an annual statement. You can download the Statement [here](#).

Global Employment Statement: This Statement applies both to our own employees and to our contractual partners. The focus is on the fair and respectful treatment of employees at all levels and compliance with applicable laws and industry standards. The Statement is available [here](#).

Group Policy on Diverse, Sustainable and Ethical Sourcing: The Policy defines criteria for the purchasing process taking into account the diverse, ethical and sustainable attributes of suppliers. It sets targets in categories such as the reduction of energy consumption, fair and social working conditions, and diversity within our supplier base in order to meet our high ethical standards in procurement.

Processes:

Inclusion of clauses in supplier contracts: We have included environmental and human rights requirements in contracts with our hotel partners and other supplier groups.

Supplier Assessment and Evaluation: For hotel partners, we rely on credible sustainability certifications. For activity and excursion providers, a certified sustainability standard has been developed and implemented in accordance with the Global Sustainable Tourism Council (GSTC), which requires them to answer questions about fair wages, working hours, child protection and local employment.

Training and awareness: Training programmes on such topics as child protection, human rights, occupational safety, and the Integrity Passport are offered via our group-wide TUI People learning platform. In addition, other channels are used to provide specialised training for relevant employee groups, e.g. child welfare and protection training for entertainment and childcare staff and introductory training on the Modern Slavery

Act for employees in purchasing and procurement. A special training campaign on the GSCA was also introduced for all TUI Group employees. Furthermore, managers of German Group companies are empowered and obligated to ensure their respective employees are aware of potential occupational health and safety risks through delegated responsibilities.

Complaints procedure

TUI Group is committed to investigating all potential violations of the law, internal policies, Integrity Passport principles and environmental and human rights due diligence. We promote a culture of open communication and trust and encourage our employees, business partners, and anyone who is aware of or may be affected by potential risks or violations to raise and openly express their concerns.

TUI is committed to protecting anyone who raises a concern. The TUI Speak Up Line, a whistleblower system hosted by an external service provider, allows concerns to be reported anonymously and confidentially to the TUI Group's Integrity & Compliance Team at any time (365 days a year, day or night). The reports are processed by the Integrity & Compliance team and, depending on the facts of the case, investigated and dealt with in coordination with various departments within the TUI Group. The rules of procedure and information on the TUI SpeakUp Line are publicly accessible via the following homepage: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken> or can be requested by e-mail to compliance@tui.com or by letter to the Integrity & Compliance Team, TUI AG, Karl-Wiechert-Allee 23, 30625 Hanover.

The effectiveness of the complaints procedure is reviewed at least once a year and, if necessary, on an ad hoc basis. The complaints procedure is continuously adapted in accordance with the legal requirements.

Remedial measures

As soon as TUI becomes aware, through any of the channels described above, that a breach of human rights or environmental obligations has already occurred or is imminent, we will take immediate remedial action.

We implement appropriate and targeted measures and differentiate between violations within our own business and those that occur in the supply chain.

In our own business, we take direct measures to address violations. For this purpose, we have defined processes for dealing with breaches in our own operations. Among other things, we call on our executives, supervisors, and managers to assume a leadership role in accordance with their employment contract that is consistent with our Integrity Passport and to provide instructions to influence the behaviour of their team members, especially the behaviour of the individual responsible for violating human rights or environmental obligations. If the measures are insufficient to change the behaviour causing the violation, we also take employment-related actions, such as issuing a warning or terminating the employment contract of the perpetrator, as legally permissible by employment law.

In the event of violations within the supply chain, we work closely with our suppliers and use our influence to address the issues. If the cause of a violation is the supplier's unwillingness to cooperate, we resort to contractually agreed measures for example. If no improvements are apparent, we reserve the right to suspend or terminate the business relationship as a last resort. In addition, if there are indications of a breach of human rights or environmental obligations by indirect suppliers, we initiate the remedial process similar to the one used for direct suppliers.

Our processes for remedial action in our own business and in the event of violations within the supply chain aim to promptly deal with imminent and ongoing violations, taking into account the affected individual (rights holder), and include monitoring the effectiveness of the procedure.

We review the effectiveness of our remedial measures at least once a year and on an ad hoc basis if necessary, continuously developing them.

We are aware that we only have limited influence over complex supply chains and cannot solve systemic problems on our own. Therefore, we are also involved in industry initiatives focussed on sustainability within the supply chain, including collaboration with Futouris e.V.

Documentation, review, and reporting

We review the effectiveness of our risk management and the processes implemented with regard to our due diligence obligations on an annual and ad hoc basis. We also continually document our efforts to effectively implement our due diligence responsibilities. In addition, we publish annual reports on the fulfilment of our due diligence obligations. These are published on our website no later than four months after the end of our financial year and submitted to the Federal Office of Economics and Export Control. They remain accessible free of charge for a period of seven years. In addition, we publish information about our performance pertaining to human rights in our Modern Slavery Act Statements (accessible [here](#)), our annual non-financial statement, and our Group's annual reports (accessible [here](#)).

Involvement of stakeholders and potentially affected parties

While implementing the described due diligence obligations, we always ensure that we keep the perspective of potentially affected groups and other relevant stakeholders in mind. It is particularly important to us that the views and expectations of those affected are taken into account when assessing risks and violations, developing preventive and remedial measures, and handling complaints.

This updated Human Rights Statement by TUI AG for the TUI Group was approved by the Executive Board on January 22, 2025. It is regularly reviewed and updated as necessary.