



Report on the GSCA

(German Supply Chain Act)

TUI AG

Reporting period from 01.10.2023 to 30.09.2024

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NOTE: THE ENGLISH TRANSLATION IS FOR INFORMATION PURPOSES ONLY. IN THE EVENT OF DIFFERENCES, THE GERMAN VERSION SHALL PREVAIL.

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Strategy & anchoring

A1. Monitoring risk management & the responsibility of the management

What responsibilities for monitoring risk management were defined during the reporting period?

Thomas Ellerbeck, Member of the Group Executive Committee, Group Director Corporate & External Affairs, Chief Sustainability Officer and Human Rights Officer

Kathrin Möllers, Group Director Sustainability & ESG

Dr. Dietmar Deffert, Group Director Integrity & Compliance, Data Privacy

Note for the German report: We predominantly use the generic masculine in our report so that it is easier to read.

A. Strategy & anchoring

A1. Monitoring risk management & the responsibility of the management

Has the management established a reporting process that ensures that it is regularly informed - at least once a year - about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process that ensures that it is regularly informed - at least once a year - about the work of the person responsible for monitoring risk management in accordance with Section 4 (3) GSCA.

- Confirmed

Describe the process that ensures reporting to management on risk management at least once a year or on a regular basis.

The TUI Group comprises TUI AG and all managed Group companies. For the purposes of this report, managed Group companies are all German and foreign companies in which TUI AG directly or indirectly holds a majority stake, as well as all other shareholdings where the management of the company lies directly or indirectly with TUI AG.

The Executive Board is the TUI Group's management body representing the company externally and managing the business internally. The extended Executive Board, the Group Executive Committee (GEC), is the TUI Group's management body. It consists of the members of the Executive Board and the heads of the core business segments and central functions. The GEC meets regularly to receive reports on the areas that are important to the company. As it is such an important topic, the report on protected human rights and environmental issues, together with the risk analysis and corresponding risk management, is part of the GEC's reporting agenda at least once a year. Reporting is carried out by TUI AG's Human Rights Officer. Employees in the Group Sustainability department work continuously on topics and issues derived from the GSCA and report to the Human Rights Officer. This includes monitoring and, in coordination with other Group functions, carrying out the various risk analyses and setting up and updating the risk management system. At the same time, an overview of risks and corresponding remedial measures in relation to the GSCA is maintained.

A Supply Chain Due Diligence Committee was set up in 2024 for internal management purposes. This Committee is made up of central departments including Group Sustainability, Group Legal, Purchasing and Procurement and Human Resources. It is also supported by the respective Human Rights Officers of TUI AG, TUI Deutschland GmbH and TUIfly GmbH. The Committee monitors the progress of the implementation of due diligence obligations in the supply chain on a quarterly basis. It analyzes potential cases, plans further measures and makes key decisions.

The Group Risk Oversight Committee is another risk management function established within the Group. It was set up by the TUI Executive Board. The Committee is chaired by TUI AG's Chief Financial Officer. During these Committee meetings, the primary Group risks, including those arising from the GSCA, are analysed.

The Group Risk Oversight Committee reports regularly to the TUI Group's Executive Board, but at least once a year.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Is there a policy statement that has been prepared or updated based on the risk analysis carried out during the reporting period?

The policy statement has been uploaded

The declaration can be downloaded from this page:

<https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei>

Direct PDF download link:

https://www.tuigroup.com/damfiles/default/tuigroup-15/de/nachhaltigkeit/human-rights-and-modern-slavery/TUI-AG-Erkl-auml-rung-zu-Menschenrechten_final.pdf-7ded9ec62403f3ef168728fb73afbbcc.pdf

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Has the policy statement for the reporting period been communicated?

It is confirmed that the policy statement has been communicated to employees, the Works Council, if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.

- Confirmed

Please describe how the policy statement was communicated to the relevant target groups.

Relevant target groups for the communication of the policy statement are at least the employees and governing bodies of the TUI Group, the Works Council, the shareholders, suppliers and partners, as well as the general public.

Events were held during the reporting year to inform employees about the principles and implementation of the GSCA at TUI. Both face-to-face and digital events were held as part of the Group-wide Sustainability Days in June 2024. Employees were informed about existing measures, such as the policy statement on the human rights strategy. The events were offered in both German and English to reach as many employees as possible.

The "TUI Declaration of Principles on Human Rights" is publicly available on the TUI Group website under the heading "Human Rights and Modern Slavery" (<https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei>).

The Policy Statement was made available and explained to the Compliance Committee of TUI AG's Group Works Council.

Explanations of the Policy Statement are also available to all TUI Group employees on the company intranet.

Suppliers of the Central Purchasing department in Germany receive a direct link via the standardised order confirmations (so-called "purchase orders") to the section of the TUI homepage in which the "TUI Declaration of Principles on Human Rights" is published. . In addition, all TUI partners, i.e. all direct and indirect suppliers or other stakeholders, will also find an explanation and direct link to the Policy Statement on the TUI partner homepage: www.tuipartners.com (<https://www.tuipartners.com/sustainability/sustainability-policies-practices/human-rights/>).

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

What elements are included in the policy statement?

- Establishment of a risk management
- Annual risk analysis
- Establishment of preventive measures in own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Remedial measures in own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Provision of a complaint procedure in own business area, with suppliers and their effectiveness review
- Documentation and reporting obligations
- Description of identified prioritized risks
- Description of human rights and environment related expectations of own employees and suppliers

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Description of possible updates during the reporting period and the reasons for them.

During the reporting period, the existing policy statement on the human rights strategy was updated as part of the regular review. This update included findings from the first report to the Federal Office of Economics and Export Control (BAFA), as well as new results from the annual risk analyses. In addition, responsibilities in the context of risk management and preventive measures were reviewed and further optimized to ensure even stronger implementation of the human rights strategy.

A. Strategy & anchoring

A3. Securing the human rights strategy within the own organisation

During the reporting period, which departments/business processes were responsible for the implementation of the human rights strategy?

- HR
- Environmental management
- Workplace Safety, Health & Safety
- Communications / Corporate and External Affairs
- Procurement / Purchasing
- Supplier Management
- CSR / Sustainability
- Legal / Compliance
- Mergers & Acquisition
- IT / Digital Infrastructure
- Community / Stakeholder Engagement
- Audit

Describe how responsibility for implementing the strategy is distributed within the various departments/business processes.

The Executive Board of TUI AG has appointed a Human Rights Officer. He monitors whether an appropriate and effective risk management system has been put in place to comply with due diligence obligations within the company. He is responsible for ensuring the strategy for implementing risk management in all relevant business processes through appropriate measures and regularly reports on this to the GEC.

In the Group Sustainability department, the responsible employees coordinate the resulting tasks with the various departments and 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, the annual report is prepared and future legislation on environmental, social and corporate governance responsibilities are reviewed. The team continually reports to the Human Rights Officer.

In order to comply with the due diligence obligations under the GSCA, the following departments liaise with their colleagues in Group Sustainability on the tasks assigned to them:

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 and Group Procurement, 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.

Describe how the strategy is integrated into operational processes and procedures.

For TUI AG and all managed Group companies, it was decided to include an additional contractual clause and the Supplier Code of Conduct, which has been adapted to the requirements of the GSCA, in contracts in accordance with a risk-based approach. This ensures that suppliers and business partners are aware of and comply with the human rights and environmental obligations arising from the GSCA as well as TUI Group's expectations of suppliers.

In areas where employees have direct, personal contact with suppliers, targeted training courses were organised, i.e. tailored to the requirements of the respective business areas. This enabled employees in direct contact with suppliers to point out the relevant requirements of the GSCA and explain the clause. In Central Purchasing in Germany, a direct link to the "TUI Declaration of Principles on Human Rights" was added to the standardised order confirmation document, in addition to the adapted Code of Conduct, so that this could be communicated to suppliers, even if there was no direct contact person available.

Describe the resources and expertise provided for implementation.

Since the end of 2022, around fifteen to twenty employees from the relevant areas mentioned above have been working on the legal obligations arising from the GSCA and their appropriate implementation within the Group as part of a Group-wide project group.

In 2024, a full-time position was created in the Group Sustainability department. This role is specifically responsible for coordinating and implementing the requirements of the GSCA throughout the Group.

Furthermore, there is intensive cooperation within the TUI Group with regard to internal legal advice between Sustainability, Integrity & Compliance, Legal and employment law specialists.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritise human rights and environmental risks?

- Yes, for own business area
- Yes, for direct suppliers

Describe the period in which the annual risk analysis was carried out.

An IT-based risk management tool was implemented during the reporting period. The risk analysis is carried out and adjusted on an ongoing basis. The data used (press releases, indices, rankings, etc.) is continuously updated to ensure a dynamic, abstract risk assessment of all suppliers. Once abstract risks have been identified, companies considered abstractly risky are subjected to a concrete risk analysis. Due to the diversity, size and scope of the TUI Group's business operations, the concrete risk analyses were carried out at different times during the review period, depending on the business and purchasing areas.

Describe the risk analysis procedure.

Appropriate risk analyses are carried out as part of risk management to identify human rights and environmental risks in the company's own business area and along 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.

The risk analyses were carried out by the Group Sustainability department for the company's own business and by the Purchasing, Procurement and Supplier Management teams for the supply chains.

Detailed procedure in own business: Of all managed Group companies, those that employ their own employees were selected for the abstract risk analysis, regardless of whether they are permanent, temporary, domestic or foreign. Based on the results of the abstract risk analysis, taking into account country and sector risk, the companies were prioritized according to the risk identified. Companies that were initially classified as high risk were sent a questionnaire to answer detailed questions about their risk exposure. The results from these questionnaires were further analysed for each risk and each company in order to carry out a risk assessment. A matrix derived from this evaluation helps understand the exposure to "high", "medium" and "low" risks, enabling the development of appropriate measures for risk minimisation and prevention.

Detailed approach in the supply chain: Due to the different purchasing processes in each of the individual business areas, four different risk analyses were carried out based on the same risk analysis methodology.

This methodology was performed in two steps: an abstract risk analysis and a concrete risk analysis. The responsible areas are Group Procurement, Accommodation Procurement and the TUI Airline and TUI Musement segments. In addition, TUI Deutschland GmbH and TUIfly GmbH, two subsidiaries of TUI AG, also carried out risk analyses, which are described in more detail in the separately published reports by TUI Deutschland GmbH and TUIfly GmbH.

In all four areas, an abstract risk assessment of the respective suppliers was first carried out using the risk management system. This assessment was based on defined criteria: industry risk, country risk and total volume/turnover. The results of this assessment determined the applicability of the risk questionnaire and consideration of other existing risk-minimizing measures. Suppliers identified as having a "high" risk exposure in the initial assessment were asked to complete the risk questionnaire.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were event-driven risk analyses also carried out during the reporting period?

- No

Give reasons for your answer.

As there was no substantial knowledge of possible breaches by indirect suppliers during the reporting period, nor were there any significant changes in the risk situation due to the development of new business areas, markets, products or projects, there was no reason to carry out event-driven risk analyses.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) in your own business area?

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

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for direct suppliers?

- Prohibition of hiring or using private/public security personnel who may cause disruption due to lack of training or control
- Prohibition of unequal treatment in employment
- Disregard for freedom of association and the right to collective bargaining
- Prohibition of forced labour and all forms of slavery
- Unlawful violation of land rights

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified as part of the risk analysis(es) for indirect suppliers?

- None

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified in the reporting period weighted and, if applicable, prioritised and, if so, on the basis of what appropriate criteria?

- Yes, based on the expected severity of the injury in terms of degree, number of people affected and irreversibility
- Yes, based on own power of influence
- Yes, based on probability of occurrence
- Yes, based on type and scope of own business
- Yes, based on the type of contribution to causation

Describe in more detail how the weighting and prioritisation process was carried out and what considerations were made.

Risks are prioritized using a risk management tool based on the following criteria: Typical expected severity of the violation, irreversibility of the violation, likelihood of the violation occurring, nature of our company's contribution to causing the violation, nature and scope of the supplier's business activities, and the company's ability to influence the direct perpetrator of the violation or risk. Violations of the ban on the worst forms of child labour, torture, forced labour and slavery are considered particularly serious and irreversible. These risks are treated as high priority. Subsequently, risks that always affect a large number of people, such as violations of occupational health and safety standards, wage discrimination and the creation of harmful soil, air and water pollution, are addressed first. Suppliers from high-risk industries are always given priority in the assessment process. The ability to influence the direct perpetrator of the potential violation is assessed in particular based on the sales volume with the supplier in question.

Own business area:

The risk weighting methodology described above was also applied to our own business division. All locations that were classified as high-risk in the abstract risk analysis received a corresponding risk questionnaire via the risk management tool. In addition, the results of this year's risk analysis were compared with the previous year's findings and validated.

Supply chain:

The distinction between "high", "medium" and "low" risks is determined by the supplier profile and the methodology described above. Suppliers classified as high-risk based on the abstract risk analysis were examined more closely.

In the hotel sector, all suppliers rated as high-risk were audited separately. The majority of suppliers provided evidence of valid certification, which reduced their risk value. The certification was awarded by independent experts in accordance with the guidelines of the Global Sustainable Tourism Council (GSTC). The GSTC is an internationally recognized, non-profit organization that promotes fundamental sustainability-related standards in the tourism sector globally and was established by the United Nations Foundations, among others. In addition, integrating environmental and human rights requirements into supplier contracts has helped to further minimize the risk value. Suppliers that continued to pose a high risk received a detailed risk questionnaire via the risk management tool.

In other purchasing areas, existing risk-minimizing measures, such as contractual agreements, were also reviewed and documented and risk questionnaires were sent out. As in the previous year, the response rate to the questionnaires was low. However, to ensure an appropriate risk assessment, the relevant suppliers were again subjected to a more detailed internal assessment, which was compared with the findings of the previous risk analysis. This weighting and prioritization resulted in the afore-mentioned prioritized risks for the supply chain.

B. Risk analysis and preventive measures

B2. Preventive measures in own business area

Which risks were prioritised in the own business area during the reporting period?

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

What specific risk is involved?

Disregard of applicable health and safety regulations

These risks can potentially include failure to comply with instructions on the ergonomic use of office furniture, insufficient number of first aiders/fire protection and evacuation personnel, exceeded test dates for fire extinguishers', failure to comply with the specifications for the design of the workplace outside the company building, defective electronic equipment, disregard of required break times, failure to differentiate between working/duty hours due to mobile working.

Where does the risk occur?

- Austria
- China
- Denmark
- Finland
- Germany
- Poland
- Sweden
- Switzerland
- Tanzania

B. Risk analysis and preventive measures

B2. Preventive measures in own business area

What preventive measures were implemented for the reporting period to prevent and minimise the priority risks in your own business area?

- Implementation of training courses in relevant business areas
- Implementation of risk-based control measures
- Other/additional measures: Group policy management

Implementation of training courses in relevant business areas

Describe the measures implemented and in particular specify the scope (e.g. number, coverage/area of application).

Various training programmes were made available to TUI Group employees via the Group-wide training platform. These included child protection, human rights, occupational health and safety and compliance.

In addition, special training courses were held for specific employee groups, for example child welfare and protection training for entertainment and childcare staff and introductory training on the UK Modern Slavery Act for employees in purchasing and procurement. A special training campaign on the due diligence requirements arising from the GSCA was developed in 2023 and addressed again to all TUI Group employees globally via the intranet in February 2024.

Occupational health and safety were also extensively trained as priority risks:

In 2024, employees of German Group companies were instructed in general occupational safety via online training. First aid and fire safety training courses were also held for the relevant target group.

In addition, managers of German Group companies have been encouraged and committed to draw the attention of their respective employees to potential occupational health and safety hazards by means of training courses offered. Employees are trained at least once a year on both general and specific topics, such as the ergonomic use of office furniture.

Describe the extent to which training to prevent and minimise the priority risks is appropriate and effective.

The training courses are assessed as appropriate, as they can specifically make employees in the relevant areas aware of possible risks and can therefore have a preventive effect. The training courses are assessed as effective as they provide information on how to identify and report violations and/or avoid them, particularly with regard to the priority risks of occupational health and safety, all forms of slavery and forced labour, and child labour.

In addition, all employees of German Group companies are trained annually on occupational safety in order to minimise the priority risk of disregarding occupational safety and work-related health hazards.

Implementation of risk-based control measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

Occupational safety specialists use risk assessments to ensure that measures are developed to minimise risks. These measures are communicated to employees through training and must be adhered to. Topics such as maternity leave, mobile working and business trips are also taken into account. The resulting measures to minimize risk include, for example, the assessment of the mobile workplace and health checks for business travellers.

In addition, employees' workstations are assessed in terms of occupational health and safety and ergonomic use. There are also regular coordination meetings with the building management to ensure that the office space is appropriately designed. Safety officers help TUI as an employer to comply with health and safety regulations. They are appointed by the management and support all areas of the company in order to prevent accidents, work-related illnesses and health hazards. All committees (employee representatives) were informed in joint meetings with the management on occupational safety and further measures to minimise risks were discussed.

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

The measures described above are considered appropriate because the annual occupational safety training makes employees aware of the topic. Assessing employees' mobile workplaces also increases transparency on the topic of occupational safety. The priority risk of a threat to employees' health is effectively reduced by health checks in preparation for business trips. Office inspections are appropriate to check the implementation of safety standards and thus effectively ensure the ergonomic handling of office equipment and health protection for employees.

Other/further measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

Group policy management

1. The Integrity Passport - the TUI Code of Conduct - is binding for all employees, from the Executive Board to trainees, and for all managed Group companies. As a Code of Conduct, it sets out guidelines on key topics such as compliance or sustainable behaviour for day-to-day work and in conflict situations and explains how concerns can be reported within the Group via the central whistleblower system. As part of the mandatory training, the content of the Integrity Passport has been translated into fourteen languages and is known to employees. There is also a website on the intranet that displays all Group guidelines, including the Integrity Passport, and gives the name of a contact in case there are questions.
2. In the past financial year, a special training course on the GSCA was developed, which was assigned to all TUI Group employees. This training explains all obligations arising from the GSCA and raises awareness on how to report potential violations.
3. The Modern Slavery Act Statement is a Statement made pursuant to section 54 of the Modern Slavery Act 2015. It describes all measures that the TUI Group is taking and has taken to prevent modern slavery and human trafficking in its own business and within the supply chain in order to mitigate the corresponding risks. Since 2017, this declaration has been published annually on the homepage, see here: <https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei/Erklaerung-zum-modernen-slavery-act>.

4. The TUI Global Employment Statement is a declaration by TUI AG focusing on fair and responsible treatment of all employees and compliance with applicable laws and industry standards. TUI expects both employees and contractual partners to comply with the requirements of the Global Employment Statement.
5. During the reporting year, an audit procedure was developed to meet GSCA requirements within our own business division: The Risk Control Matrix (RCM) serves as a central tool within internal audit to systematically identify and evaluate risks, specifically linking them to control measures. The RCM for GSCA will be used in future audits within its own business division. The matrix was deliberately designed to be used across all TUI segments. It presents specific GSCA risks and provides information on corresponding controls and audit methods.

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

The above measures are considered appropriate and effective. The Integrity Passport provides guidance to TUI Group employees on how to deal with the most important legal and integrity issues in their day-to-day work with colleagues, customers, business partners and other third parties. To ensure that employees understand the content of the document, it has been translated into fourteen languages and is available on the intranet.

Training on the GSCA was provided to all TUI Group employees. The main aspects of the GSCA were explained. By raising employees' awareness to these issues, potential violations can be identified much more quickly and measures can be taken to minimize risks. Potential risks can be easily reported via the established whistleblower system and, if necessary, contact can be quickly established with the contractual partner.

Public declarations such as the Modern Slavery Act Statement and the TUI Global Employment Statement clarify the requirements TUI has for employees and contractual partners. This contributes significantly to compliance with applicable laws and standards. The transparent presentation ensures that all those involved are aware of the expectations placed on them.

The RCM for the GSCA is effective in systematically identifying and assessing risks, linking them to appropriate control measures in a targeted manner. The RCM's Group-wide applicability ensures that risks can be uniformly monitored and addressed across all business divisions and regions. The RCM remains flexible and adaptable to new requirements due to the regular review of control measures and the integration of specific testing methods.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

Which risks were prioritised for direct suppliers during the reporting period?

- Prohibition of hiring or using private/public security personnel who may cause harm due to lack of training or supervision
- Prohibition of unequal treatment in employment
- Unlawful violation of land rights
- Disregard for freedom of association and the right to collective bargaining
- Prohibition of forced labour and all forms of slavery

Prohibition of hiring or using private/public security personnel who may cause disruption due to lack of training or control

What specific risk is involved?

The risk analysis has identified specific risks related to the commissioning of private or public security forces, particularly in accommodation, tour operators and aviation, which could have potential adverse effects.

Where does the risk occur?

- Turkey
- Egypt
- Vietnam
- United Arab Emirates

Prohibition of unequal treatment in employment

What specific risk is involved?

One specific employment risk is the prohibition of unequal treatment, particularly in the accommodation, tour operator and aviation sectors. Problems can potentially arise in these sectors if employees are treated unequally based on characteristics such as gender, origin or religion.

Where does the risk occur?

- Thailand
- Turkey
- Egypt

Disregard for freedom of association and the right to collective bargaining

What specific risk is involved?

The analysis identified the specific risk, that freedom of association and the right to collective bargaining may not be sufficiently respected, particularly affecting suppliers in the accommodation, tour operator and aviation sectors.

Where does the risk occur?

- Thailand
- Turkey
- Egypt
- Vietnam

Prohibition of forced labour and all forms of slavery

What specific risk is involved?

The analysis also identified the risk of forced labour and all forms of slavery, particularly affecting suppliers in the accommodation, tour operator, aviation and catering sectors where there is an increased risk of employees being forced to work under exploitative conditions.

- Thailand
- Turkey
- Indonesia
- Egypt
- Mexico
- United Arab Emirates
- Vietnam

Unlawful violations of land rights

What specific risk is involved?

Another specific risk is the unlawful violation of land rights, particularly in sectors such as accommodation, tour operation and gastronomy. This often involves the unlawful use or appropriation of land, restricting the rights of local communities and triggering social conflicts

Where does the risk occur?

- Thailand
- Turkey
- Egypt
- Indonesia
- Mexico
- Maldives

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

What preventive measures were implemented for the reporting period to prevent and minimise the priority risks among direct suppliers?

- Integration of expectations into the supplier selection process
- Obtaining contractual assurance for compliance with and implementation of expectations along the supply chain
- Training and further education to enforce contractual assurance
- Other/further measures:
 - For hotels: Check whether there are currently valid sustainability seals that are verified by independent companies and follow the guidelines of the Global Sustainable Tourism Council, as these cover human rights and environmental issues.
 - Industry-wide collaboration

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

From 2023, the TUI Group's contract negotiations with suppliers will include updated General Terms and Conditions and the Supplier Code of Conduct. It is therefore mandatory for suppliers to include at least the updated Supplier Code and/or the new Terms and Conditions in the contract. In all other cases, suppliers were asked to complete a risk questionnaire to ensure compliance with the standards of the GSCA. These measures are considered appropriate as suppliers are thereby made aware of the due diligence obligations to be observed, which can subsequently lead to effective risk prevention.

Within TUI Musement, all contract templates for transport, accommodation, activities and restaurants in destinations have been adapted as described above. The use of these standard contract templates ensures that the requirements of the GSCA are taken into account in newly agreed contracts. Priority for sending out questionnaires was given to suppliers who were identified as high risk or to those suppliers who declined to implement the updated standard contract templates.

During the year under review, the existing GSCA information package on the TUIpartner website was further developed to provide suppliers with more targeted support in implementing GSCA requirements. The Human Rights Toolkit is a training package that provides detailed information about the GSCA and its practical application at TUI. It aims to sensitize suppliers to comply with due diligence obligations and to strengthen their understanding of human rights standards. The information package includes detailed descriptions of specific key risks in the tourism supply chain, not only providing an overview of existing TUI guidelines, but also reference to external resources such as available training courses.

These measures were used to inform suppliers about the content and requirements of the GSCA.

In addition, contracted hotels were reviewed as to whether they had an existing sustainability seal and whether it was up to date. The review was carried out by independent experts. The certificates must comply with the guidelines of the Global Sustainable Tourism Council (GSTC). To receive a certificate, comprehensive management systems must be implemented, including checks on human rights and environmental risks. As these sustainability seals were developed specifically for hotels and are geared towards any risks relating to human rights and the environment, they make a decisive contribution to minimizing risks.

The implementation of the "Diverse, Sustainable and Ethical Sourcing" Group policy in September 2023 introduced criteria into the procurement process that helps take into account the diverse, ethical and sustainable attributes of suppliers. The list of questions resulting from the Policy is embedded in the Group Procurement tendering platform. In order to participate in a tender, all suppliers must complete the questionnaire. The answers from the questionnaire are evaluated by the Procurement department and the relevant technical experts. The results of the evaluation are incorporated into the overall assessment and the final contract award. The procurement team is trained to be sensitive to diverse, ethical and sustainable procurement issues. Raising employee awareness ensures that potential problems are identified and appropriate measures can be taken.

In addition, the whistleblower system implemented throughout the Group and the associated complaints procedure ensure that employees, suppliers and any external personnel have the opportunity to raise concerns confidentially and anonymously. Potential risks can be easily reported via the whistleblower system and, if necessary, contact can be quickly established with the contractual partner in order to take any necessary measures to minimise or prevent a breach of due diligence obligations.

Industry-wide co-operation:

To support industry-wide progress, TUI continues to be active on the boards of the Global Sustainable Tourism Council (GSTC) and Travelife. Both associations deal with issues such as human rights and environmental protection, the results of which are reflected in the sustainability certification standards for hotels. TUI is also a member of the board of Futouris, the Germany-wide initiative for sustainable tourism. In this context, cross-industry solutions are developed on the basis of project work on, for example, environmental protection and human rights issues, such as basic training on the GSCA for suppliers in the tourism industry.

Development and implementation of suitable procurement strategies and purchasing practices:

By implementing the amended General Terms and Conditions and the updated Supplier Code of Conduct in contracts with direct suppliers, they are required to pass on the expectations and obligations arising from the GSCA to their suppliers, TUI's indirect suppliers.

The contractual obligation to pass on the requirements resulting from the GSCA in the supply chain by the direct supplier is considered appropriate and effective. Direct suppliers are required to implement appropriate measures with their immediate suppliers in order to prevent risks.

B. Risk analysis and preventive measures

B5. Communication of results

Were the results of the risk analysis for the reporting period communicated internally to relevant decision-makers??

Confirmed

B. Risk analysis and preventive measures

B6. Change in risk disposition

What changes have occurred with regard to priority risks compared to the previous reporting period?

With the introduction of an IT tool for carrying out risk analyses in our own business area and in the supply chain during the reporting year, it is now possible to monitor human rights and environmental risks in greater detail, systematically and continuously. This innovation has changed the priority risks compared to the previous reporting period, when the analyses were conducted manually and in collaboration with an external consultancy firm.

C. Identification of violations and corrective measures

C1. Identification of violations and corrective measures in own business area

Were any violations identified in your own business area during the reporting period?

- Yes, only abroad

Please specify: In which topics were violations identified in your own business area?

- Prohibition of unequal treatment
- Disregard for occupational health and safety and work-related health hazards

Enter the number

3

Describe the appropriate remedial action you have taken.

1) Prohibition of unequal treatment

a) The complaint related to the home office regulation in the TUI Musement segment, that contradicted recent court decisions in Spain regarding the performance of work in unforeseen circumstances (e.g. internet problems, power failure). The allegation received via the complaints procedure was addressed to the responsible HR department. The investigation revealed that the home office policy did not comply with local requirements. As a result, it was adjusted and subsequently communicated to employees.

b) The complaint included the allegation of dismissal for discriminatory reasons, as the manager responsible had mixed professional and personal relationships. The investigation revealed that the employee had been dismissed due to poor work performance. The manager was advised to keep professional and personal relationships separate.

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

The complaint related to the condition of accommodation in a target area, where fire escapes were missing or defective. The hotel concerned checked the condition of the fire escapes and the rooms were closed until the necessary repairs were completed

In cases where violations could not be stopped, describe where they occurred.

The violations were stopped.

Describe what long-term remedial measures (e.g. follow-up concepts) have been taken and what considerations were made with regard to the selection and design of measures to stop or further minimise.

1 a) The home office policy was adapted and subsequently communicated to employees.

1 b) The manager was advised to keep professional and personal relationships separate.

2) The defective fire escapes were repaired, solving the problem.

Describe how the effectiveness of the corrective measures is verified.

The effectiveness of the measures is reviewed on site using the criterion of further incoming complaints from employees.

Have the remedial measures led to the cessation of the violation?

- Yes

Explain.

All remedial measures were able to put an end to the violations.

Have you analysed to what extent the identified violation is an indication of a possible need to adapt/add to existing preventative measures? Please describe the process, results and impact of your analysis.

The identified violation and the resulting need to adjust the preventative measures are analysed on a case-by-case basis in coordination with the relevant business areas.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective measures among direct suppliers

Were any violations identified among direct suppliers during the reporting period?

- No

C. Identification of violations and corrective measures

C3. Identification of violations and corrective measures among indirect suppliers

Were any violations identified among indirect suppliers during the reporting period?

- No

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- Company's own complaints procedure

Describe the company's own process and/or the process in which your company participates.

TUI Group has implemented an internal complaints procedure since 2009. 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). In accordance with the Supply Chain Due Diligence Act and the EU Whistleblower Directive, the TUI Speak Up Line is also accessible to third parties outside the TUI Group. All information received is consistently followed up in the interests of all stakeholders and the company. The reports are processed by the Integrity & Compliance Team and, depending on the facts of the case, are investigated and dealt with in coordination with various departments within the TUI Group.

To improve the procedure for reporting concerns and simplify access to the system for employees and external parties, preparations were made during the reporting period to replace the service provider of the whistleblower system. The changeover took place shortly after the end of the financial year. Whistleblowers can now use the new system to contact the hotline via the web, from mobile devices and directly by telephone. The rules of procedure were updated accordingly. 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.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Which potentially involved parties have access to the complaints procedure?

- Own employees
- Communities near own locations
- Employees of suppliers
- External stakeholders such as NGOs, labour unions etc.
- Others: Public access to the complaints procedure (TUI Speak Up Line) for employees and third parties outside the TUI Group (see previous explanation)

How is access to the complaints procedure ensured for the various groups of potentially involved parties?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and comprehensible
- All information is openly accessible

Publicly accessible rules of procedure in text form

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on accessibility

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on responsibility

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on the process

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

All information is clear and comprehensible

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

All information is openly accessible

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Were the rules of procedure for the reporting period publicly available?

File was uploaded

The Rules of Procedure:

This is the website from which the rules of procedure can be downloaded:

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

This is the direct link to the rules of procedure:

German: [Wie_melde_ich_Bedenken_v_2.2.pdf-aa359cf888435f70c091d1f201726b33.pdf](https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken/Wie_melde_ich_Bedenken_v_2.2.pdf-aa359cf888435f70c091d1f201726b33.pdf)

English: [How_to_raise_a_concern_2.2.pdf-fab19aea3854776512536737ceff9d56](https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern/How_to_raise_a_concern_2.2.pdf-fab19aea3854776512536737ceff9d56).

D. Complaints procedure

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

Dr. Dietmar Deffert - Group Director Integrity & Compliance, Data Privacy

It is confirmed that the criteria contained in Section 8 (3) GSCA is met by the responsible parties, i.e. that they guarantee impartial action, are independent and not bound by instructions and are obliged to maintain confidentiality.

- Confirmed

D. Complaints procedure

D2. Requirements for the complaints procedure

It is confirmed that precautions were taken during the reporting period to protect those potentially involved from being disadvantaged or penalised as a result of a complaint.

- Confirmed

Describe what precautions have been taken, in particular how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

TUI uses an external service provider for the complaints procedure. The confidentiality of the identity of whistleblowers is ensured by technically restricting access to the whistleblowing system. Only the responsible parties and authorised individuals named in the rules of procedure and in the "Group Works Agreement on the Electronic Whistleblowing System and Procedure" concluded for this purpose have access. Messages received by telephone are transcribed so that no employee can recognise the whistleblower by their voice. In addition, the involvement of a service provider makes it technically impossible for TUI to trace the message back to the whistleblower.

Describe what precautions have been taken, in particular what other measures are in place to protect whistleblowers.

Whistleblowers are informed when they first make contact via the electronic whistleblowing procedure that the system is used anonymously during all steps of the procedure, unless a personal note is left. In this case, the name of the whistleblower will be treated confidentially. If the whistleblower leaves personal data, they will be informed of their right to withdrawal and given a contact address for the further handling of personal data. It is made transparent that in certain cases, despite revocation, TUI may be obliged to pass on personal data in order to protect legal rights.

The Group Works Agreement also ensures that whistleblowers do not have to fear sanctions if they provide information in good faith and for altruistic reasons. An exception applies to whistleblowers who deliberately and falsely denounce the company.

D. Complaints procedure

D3. Implementation of the complaints procedure

Did you receive any information about the complaints procedure during the reporting period?

- Yes

Give details of the number, content, duration and outcome of the procedures.

During the reporting period, 27 reports relating to the GSCA were received. All cases were investigated and, if necessary, further measures were taken. All reports received related to human rights risks. The average time taken to conclude the complaints procedure, from receipt to closure of the case, was 145 days.

On which topics have complaints been received?

- Prohibition of child labour
- Disregard for occupational health and safety and work-related health hazards
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage

Describe the conclusions drawn from the complaints/reports received and the extent to which these findings have led to adjustments in risk management.

Conclusions from the complaints/reports and adjustments to risk management will be made in the future.

E. Review of risk management

Is there a process in place to review the appropriateness and effectiveness of risk management across the board?

In which of the following areas of risk management is the appropriateness and effectiveness checked?

- Resources & expertise
- Risk analysis and prioritisation process
- Preventive measures
- Remedial measures
- Complaints procedure
- Documentation

Describe how this audit is carried out for the respective area and what results it has led to, in particular with regard to the prioritised risks.

Risk identification and management are based on the existing structures of the TUI Group's group-wide risk management system. TUI Group's internal audit department continuously reviews the appropriateness and effectiveness of the system at its own discretion. In particular, processes for risk identification and countermeasures are examined. Risks affected by the GSCA are also reviewed.

Previous audits have taken into account, among other things, planning processes and action planning for all prioritized risks and, in particular, have recommended continuity in the form of a structured management system. In addition, in another audit of a remote destination entity (in Peru), the internally developed audit procedures (Risk Control Matrix) for key GSCA requirements were effectively applied. Furthermore, as part of a regular audit of the compliance management system by Group Internal Audit, central components such as the whistleblower hotline and other components used for GSCA applications were reviewed. Further audits in this financial year will consider compliance with selected GSCA requirements, particularly in entities in sensitive vacation destinations.

E. Review of risk management

Are there processes or measures in place to ensure that the interests of your employees, the employees within your supply chains and those who may otherwise be directly affected in a protected legal position by the economic activities of your company or by the economic activities of a company in your supply chains are adequately taken into account in the establishment and implementation of risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

- Resources & expertise
- Preventive measures
- Remedial measures
- Complaints procedure

Describe the processes and measures for the respective area of risk management.

The interests of potentially affected parties are taken into account in various areas of risk management.

Resources/expertise:

As described above, various departments are involved in the implementation of the TUI Group's human rights strategy. Cross-departmental dialogue gives the company the opportunity to cover other interests of relevant stakeholders and potentially affected parties. For example, the results of audit and risk processes carried out by the occupational health and safety team can serve as indicators for expanding further preventative measures in the company's own business area.

Multi-stakeholder initiatives:

TUI participates in various industry initiatives, including Futouris e.V. This form of collaboration with other companies in the industry and relevant stakeholders offers the opportunity to recognise additional interests of potentially affected parties, especially within the supply chain, and develop appropriate measures.

Preventive measures:

Existing preventive measures protect the interests of those potentially affected. Examples include training initiatives in areas such as human rights, occupational health and safety and compliance. Additionally, through regular dialogue with the Group Works Council the interests of employees are taken into account in risk management.

Remedial measures:

When identifying violations and remedial measures among direct suppliers, conclusions can also be drawn about the interests of other potentially affected parties. For this reason, when a corrective measure is completed, a case-based review is carried out to determine whether there is a need to establish further preventive measures so that other potentially affected parties within the supply chain can also be adequately protected against such violations.

Complaints procedure:

From reports or confirmed cases that the company receives as part of the complaints procedure, it is sometimes possible to draw conclusions about the interests of those potentially affected. If this is the case, the company subsequently initiates appropriate preventive measures based on these findings.