

CODE OF CONDUCT

lastminute.com N.V.

lastminute.com

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OUR COMMITMENT

Our Code of Conduct fully reflects our dedication to integrating corporate social responsibility in all our operations. This commitment forms the foundation of our Sustainability strategy, which prioritises business integrity, environmental & social positive impact, and the creation of an inclusive work environment.

To ensure this strategy is in line with current global priorities, we have linked all our key initiatives to a UN Sustainable Development Goal (SDGs), focusing on the objectives that we believe are most fit to our company culture.

Our values, in fact, are at the very heart of everything we do:

#LIVEBOLD

encourages living with purpose, recognising that **every moment is an opportunity to grow and to generate positive impact - both on yourself and on people around you.** It's about being ready to embrace challenges, while upholding unwavering integrity and respect.

#BEYOURSELF

celebrates authenticity and individuality. It emphasises the power of embracing one's unique qualities and using them as a catalyst for innovation. At the same time, **it's also about the importance of respecting and appreciating the diversity of those around you.**

#OWNIT

is a commitment to personal - and collective - excellence that fosters a culture of accountability and resilience. **It's about giving your best, staying confident in your abilities, and empowering others to do the same.** "Own it" means understanding that mistakes are inevitable, yet valuable opportunities for learning and growth.

1. INTRODUCTION TO OUR CODE OF CONDUCT

1.1 Purpose and Scope

Ethical behaviour is crucial in creating successful relationships with our employees, business partners and stakeholders. **This Code of Conduct establishes a framework of what the Company expects from its employees' ethical behaviour.** The Code summarises our cultural norms and principles to help guide decision-making, build long-lasting relationships based on honesty and integrity and conduct business respecting the rights of all our stakeholders.

Rather than a set of specific rules, as not every single situation can be covered, this Code emphasises a standard of ethical conduct that must permeate all business dealings and relationships. The Code is complemented by the Company's more detailed [Internal Policies](#) and our [Employee Handbook](#).

This Code of Conduct ("Code") was adopted by the board of directors ("Board of Directors") of lastminute.com N.V. ("LMN" or the "Company") on 18.12.2023 and applies to everyone, including:

- directors
- officers
- employees

of the Company and each of its subsidiaries. It may also be furnished to others performing services for the Company. Each of us must read this document promptly upon receiving it.

1.2 Dissemination of the Code

You can find the Code on our [corporate website](#) on the investors' pages dedicated to governance documentation. It can also be found in our [Handbook](#). Every new employee receives the code during their onboarding process and key topics are included in our annual training mandatory for all employees.

1.3 Personal Responsibility and Ethical Decision-Making

Personal Responsibility

All of us are expected to protect and enhance the assets and reputation of lastminute.com and we all have to play our part fulfilling our ethical responsibilities.

In addition to the ethical guidelines included in this Code, there are many applicable laws and regulations that affect us in each of the markets and countries where we do business and we must comply with them. If a law conflicts with a policy in this Code, you must comply with the law.

Ethical responsibilities of all employees

- Be familiar with the Code's principles and make consistent decisions.
- Comply with applicable laws and regulations.
- Be transparent and uphold honest communication.
- Ask questions when unsure how to act.
- Raise and report concerns about failure to comply with any principles of the Code.

Managers

- Promote compliance with the Code and any applicable laws and regulations among your team, leading by example.
- Foster a culture of integrity and accountability.
- Encourage employees to raise or report concerns in good faith and ensure adequate follow up actions are taken.
- Take a zero tolerance stance towards any acts of retaliation against whistleblowers.

Embracing a Risk Management Culture

Fostering a culture centred around risk management is a priority for our company, and including this topic in our Code of Conduct highlights our commitment to organisational stability and stakeholder interests. Our focus on risk management, serves as a foundation for preventing issues, making well-informed decisions, and capitalising on potential opportunities. In today's dynamic business environment, proactive risk identification is crucial to safeguard our reputation, financial security, and stakeholder trust, fostering resilience and adaptability in the face of challenges. Beyond defence, risk management also uncovers growth opportunities. Recognizing potential risks, in fact, allows us to strategically take calculated risks, fostering innovation and enhancing performance. This empowers our team to think critically and act decisively amidst uncertainty. Our commitment to a risk-aware culture is not just a statement—it's a shared responsibility for all lastminute.com employees. Embracing it strengthens our foundation, enabling us to navigate industry complexities with wisdom and foresight.

Disciplinary Action

Employees and officers who violate this Code and other company policies and procedures may be subject to disciplinary action, including termination. In addition, disciplinary measures will apply to anyone who directs or approves infractions or has knowledge of them and does not move promptly to correct them according to Company policies. Anyone who violates the law during their employment may be subject to criminal and civil penalties, and payment of civil damages to others. The foregoing in accordance with any applicable law.

Ethical Decision-Making

Ethical behaviour should be deeply rooted in our everyday business, especially in our decision-making processes. It might be helpful to reflect in a calm and reasoned manner about any potential ethical dilemma by reading the applicable Code and internal policies sections, assessing the risk and impact of your potential decision and asking for guidance. **When facing a situation where you are unsure how to react correctly**, think about your potential course of action and **ask yourself the four questions found below**. If you cannot answer "yes" with confidence to all four of these questions, please contact your line manager or use our "Integrity Helpline" to ask a question before acting! On how to use the Integrity Helpline please see [1.4 "How to raise a concern"](#).

QUESTIONS TO ASK YOURSELF WHEN BEING UNSURE ABOUT YOUR COURSE OF ACTION:

1

Is the course of action legal?

2

Is it by moral standards the right thing to do?

3

Is the course of action consistent with our Code?

4

Would you feel okay if your actions were disclosed publicly (to colleagues, your family)?

1.4 How to raise a concern

For raising concerns of any kind, the Company has created an Integrity Helpline.

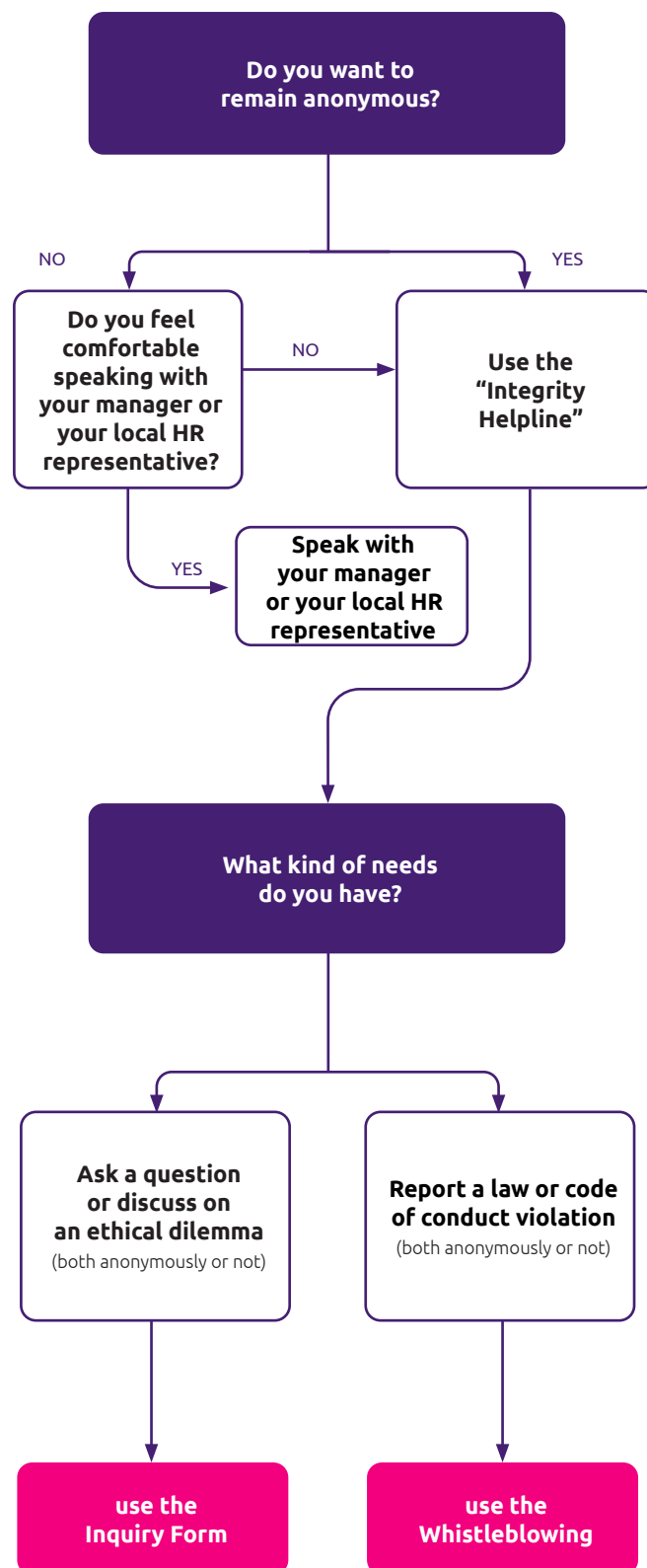
You should always evaluate the possibility of discussing your concern with your manager or the local HR representatives. However, the Company gives you the opportunity to address a concern confidentially through a web based platform, that consists of two channels:

- the **Whistleblowing**, that should be mainly used for reporting violations of the Code of Conduct or illegal behaviour and severe misconduct like harassment, discrimination, bribery and corruption, as well as unfair competition and violation of consumer protection regulations and any other type of offence and/or crime, as per the [Whistleblowing Policy](#) currently in place and in accordance with any subsequent changes of it.
- the **Inquiry Form**, that should be used for asking questions regarding potential violations of the Code, raising concerns about ethical dilemmas, and ask for support to define suitable actions to be taken.

Both tools give you the option to stay anonymous. Please refer to the box principles to know more about the ethics standards that guide the Integrity line.

We guarantee that the Company will commit to treat reports with the **highest degree of confidentiality** as the situation permits and in compliance with any applicable whistleblowing and data protection laws. Please keep in mind that in some circumstances, it may be difficult or impossible for the Company to thoroughly investigate reports that are made anonymously. In this case we will take care to inform you and explain why.

For more details on the Whistleblower Channel and relevant process, please have a look at our [“Whistleblowing Policy”](#).



By choosing the Inquiry Form, your request will be considered with the support of the corresponding department inside the company, for instance, legal, HR or the Audit team.

All concerns raised through this channel will be investigated with the same thoroughness and level of confidentiality as the reports filed through the Whistleblower tool, and it may be the case that the reported irregularity is nevertheless referred to the competent body. For more details on the Inquiry Form and relevant process, please have a look at our [“Inquiry Form Procedure”](#).

GUIDELINE

CONFIDENTIALITY

We guarantee complete confidentiality when you raise concerns. Reports are treated promptly, fairly, and diligently.

GOOD FAITH

Report your concerns honestly. You don't need to be certain, just accurate.

NO RETALIATION

We have zero tolerance for retaliation against those who report in good faith. The rights of the person under investigation are also protected.

ANONYMITY

Both tools allow you to remain anonymous, but thorough investigation may be limited for anonymous reports in some cases.

COMPLIANCE

We are committed to ensuring that all reports and relations with whistleblowers and persons involved are handled in compliance with any applicable laws.

1.5 Human Rights

Respecting human rights and treating people with dignity and respect is fundamental. Our commitment to human rights is guided by international standards like the UN Guiding Principles on Business & Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We encourage everyone to respect and promote human rights throughout our operations by seeking to identify, prevent and mitigate human rights violations. For further details please consult our [Human Rights Policy](#).

1. **We do not accept forced or compulsory labour.** Modern slavery is a crime and a violation of fundamental human rights. The Company has a zero-tolerance approach to modern slavery and is committed to ensuring there is transparency in its own business and in its approach to tackling this topic. For details please consult our [Modern Slavery Act Policy](#).
2. **We do not accept child labour** as stated in the UN Convention on the Rights of the Child.
3. **We do not accept exploitation in any form.** By contributing to the SDG 8 “Decent work and economic growth” we protect labour rights and promote safe and secure working environments for all our colleagues.

We expect our business partners to apply similar standards, so before entering into business relationships with anyone we should raise the topic of the principles described above as well as the topic of paying living wages. We will also engage with our suppliers and business partners with regard to preventing and mitigating potential adverse impacts.

2. OUR OBLIGATIONS TO OUR STAKEHOLDERS

As a business we aim to create long-term value for all our stakeholders, including employees, customers, investors, partners and communities striving to build value across our operating regions while producing profitable, sustainable growth. We attach the highest priority to protecting the rights of all our stakeholders ensuring long-lasting relationships based on mutual confidence and well-being for all.

Stakeholders	Why do we take care of them	How we create value for them
 Customers	Our customers drive our business forward with their appetite for travel and digital solutions, letting us anticipate the trends in the industry.	We strive to be the leading company in product excellence and customer satisfaction. Not only do we constantly work to add new travel options and thus broadening our offering, but we are also continuously investing in our websites and apps to take the customer experience to the next level.
 Employees	Our 100% digital business model is the result of pink people's work, creativity and passion. This is why we put our employees at the heart of our thinking. They deliver our vision and underpin our core values through their daily work.	We constantly strive to make our working model smarter, ensuring flexibility and work-life balance to our people. At the same time we promote personal growth, empowerment and accountability investing in talent retention initiatives, fostering advanced learning as well as an open-minded, inclusive culture.
 Suppliers & Partners	We have a wide range of different suppliers including content providers, technology suppliers, consultants and call centres supporting our Customer Care team.	Reaching a large consumer base every day, we provide a significant distribution channel for our suppliers - be it travel product suppliers, financial services suppliers or non-travel suppliers in the B2B space.
 Society & Communities	We've always had the idea of thinking globally and acting locally, and as a travel tech company sending people all over the world we feel our responsibility reaches further than just where our offices are based.	We engage in different local projects, from beach cleanups to recycling, to support local communities in their efforts to protect the environment and we encourage volunteering activities supporting local charities.
 Shareholders	Our listing at the SIX Swiss Exchange gives us the opportunity to engage with investors from all over the world to access equity capital.	We continue to increase our outreach to institutional investors and stock analysts through conferences and roadshow participation.
 Financial Institutions	A number of banks and financial institutions partner with us in managing the significant cash turnaround of our business.	We maintain an active and continuous dialogue with banks and financiers.
 Governments, Institutions & Supervisory Authorities	As an international online travel services provider who operates in regulated markets we are licensed and supervised in many different jurisdictions.	We closely cooperate with all regulatory bodies and authorities on all legal matters.
 Environment	While our carbon footprint as a digital company is relatively small, we sell travel, which of course has a significant impact on global climate change.	While on the one hand we strive to reduce our own carbon footprint even further, we also work on initiatives to invite our customers to travel in a more sustainable way. We also encourage the principles of a circular economy within the scope of our Company's assets.

3. EMPLOYEES

Our workplaces should promote teamwork, diversity, inclusion and trust as well as maintain a safe working environment. Our labour and employment policies and practices are intended to ensure fair and non-discriminatory labour practices and we are against harassment and discrimination of any kind.

Please keep in mind that **all professional roles are equally important** in reaching the company's goals. All job categories deserve the same respect as they are crucial for our Company's success!

If you have any questions about the laws or our policies governing labour and employee relations matters, you should contact your local human resources representative.

3.1 Discrimination

Discrimination is treating someone unfairly based upon their personal characteristics or beliefs.

We expect our managers to hire and promote solely on the basis of the qualifications, experience and skills required for the job and regardless of personal characteristics like race, colour, religion, national or social origin, gender, sexual orientation, family status, age or disability. We are committed to treating all employees and applicants for employment with respect and dignity, and we are against discrimination of any kind.

3.2 Workplace Bullying & Harassment

Bullying is repeated unreasonable behaviour towards a person or group of people leaving them feeling intimidated or offended.

Such behaviour can come from colleagues, supervisors, or subordinates and can be motivated by power imbalances, personal vendettas, jealousy, or other reasons. Workplace bullying has serious consequences, affecting both the targeted individual and the overall work environment.

It can lead to decreased job satisfaction, increased absenteeism, reduced productivity, and long-term psychological and physical health issues for the victim. If you experience such behaviour please talk to your line manager, your Human Resources representative or [raise a concern](#).

EXAMPLES OF WORKPLACE BULLYING INCLUDE (BUT ARE NOT LIMITED TO):

- Socially or physically excluding or disregarding a person in work-related activities.
- Sabotage or undermining of a person's work performance e.g. overloading, underloading, withholding information etc..
- Persistent ignoring or interrupting an individual at meetings.
- Spreading rumours and gossip regarding an individual.
- Taking credit for another person's ideas or work.

EXAMPLES OF HARASSMENT INCLUDE

Harassment is when the bullying behaviour is triggered by someone's personal characteristics, such as age, sex, race, gender, disabilities or religious beliefs.

The harassment can be verbal, physical or a visual behaviour where the purpose or effect is to create an offensive, hostile or intimidating environment. It can be linked to prejudices and biases present in the workplace or our society.

(BUT ARE NOT LIMITED TO):

- Sexual advances or unwanted physical contact.
- Repeated and/or unwelcome sexual suggestions, requests for sexual favours.
- Offensive jokes, gestures, sounds or insults related to personal characteristics.
- Displaying or distributing offensive pictures or cartoons for example related to religious beliefs or sexual orientation.
- Send or forward obscene, pornographic or discriminatory materials.

3.3. Upholding professionalism and respect in all settings

Respect and professionalism are core values at lastminute.com and must be upheld in all professional settings, including when working in the office, remotely, during business trips, at partners' sites, company-sponsored events, or any other work-related context where you represent the Company.

These principles also apply to social and recreational events organized by the company or by a company partner, such as corporate dinners, off-site trips, awareness days, and volunteer activities.

In the same way, during as well as informal gatherings among colleagues, such as post-work dinners or drinks. In these situations, employees' behavior can impact the workplace environment and lastminute.com's reputation.

Such behavior may have repercussions, particularly if it:

- Affects professional relationships.
- Creates an uncomfortable environment.
- Impairs employees' ability to collaborate harmoniously and effectively.

Additionally, even outside of work-related settings, all employees - especially those in managerial roles - indirectly represent the company in their interactions with colleagues and external partners.

Our commitment to fostering a healthy, inclusive, and respectful workplace extends to all interactions between employees, regardless of location or context, as each of us represents lastminute.com.

All the behaviors outlined above (sections 3.1., 3.2. and 3.3.) are unacceptable and strictly prohibited within our Company. Employees who engage in any form of abusive conduct will be subject to disciplinary action, up to and including termination, to the extent permitted by law and applicable collective bargaining agreement. Likewise, making false accusations is considered a serious violation of our policy and will be treated with the same level of severity.

Employees responsibilities related to discrimination, inclusion and work-life balance

- Treat everyone with fairness, regardless of personal characteristics or beliefs
- Embrace and celebrate diversity, recognizing its importance for creativity and innovation
- Base hiring and promotions solely on criteria such as qualifications, skills, and the value generated
- Actively oppose and prohibit all forms of discrimination within the company, and encourage reporting of any bullying or harassment incidents promptly
- Promote a healthy work-life balance and respect employees' right to rest and recharge

3.4 Diversity & Inclusion

We strongly believe in creating and fostering a **diverse and inclusive work culture** within our Company allowing everyone to thrive, develop and expand their existing skills inspiring creativity and innovation. **People with different skills and backgrounds** working together as a team are essential for discovering unique solutions, effective decision-making and achieving company goals. At the same time, the Company benefits from higher rates of employee engagement and satisfaction as well as from improved work quality strengthening its market performance. Different perspectives and ideas, varied thoughts, talents and values are the pillars of our Company's success. **We encourage people to be themselves** as stated in our Company values. We comply with local laws requiring special gender quotas and we are aware of local regulations stating the integration of people with disabilities into the workforce. We promote open and non-discriminatory searches for personnel and encourage people with disabilities to become part of our company, constantly improving our inclusive work culture.

3.5 Work-life balance and digital disconnection

We are committed to promoting a **sound work-life balance** by promoting meaningful in-person moments and, at the same time, giving our people the chance to, in compliance with local regulations and laws, choose where, when and how they want to work. In addition to the flexibility offered in our [Hybrid Working and Full Remote Working policies](#), when and where possible, we offer the possibility to work up to 8 weeks per year from anywhere. This means employees have the opportunity to spend time working at a location away from their usual place of work and/or outside of the country where they reside. For more details please have a look at our [Work from Anywhere Policy](#).

We respect the right to enjoy well-deserved vacations without disturbance and we do not expect our employees to be connected to any professional digital tool outside working hours, unless the specific job role, force majeure or exceptional circumstances like a major disruption affecting our customers should require differently. For more details please have a look at our [Hybrid Working Policy](#).

3.6 Labour Standards, Health and Safety

Labour Standards

We operate in many different countries with varying labour standards and conditions. Wherever we do business, we seek to ensure that we provide employees throughout the world with satisfactory working conditions and wages. We are committed to pay adequate wages respecting local circumstances as well as all legal requirements. We respect our employees' right of freedom of association and representation either through trade unions, works councils or any other appropriate forum.

Health and Safety

Your health and safety is our priority. lastminute.com is committed to maintaining a safe work environment. It is absolutely necessary that you comply with our health and safety related internal policies and procedures. Please alert your supervisor and a Human resources representative immediately about possible health and safety hazards, broken equipment or accidents at any of our facilities.

It also applies to our people working remotely. You must ensure that the location you work from is adequate to perform your job properly and in a secure way. For more information please refer to our [Smart Working Security Policy](#).

We provide further guidance for remote workers in our [Employee Handbook](#), as you have a commitment to take care of your own health and safety at your chosen workspace. We also understand that working remotely can lead to feelings of isolation and lack of belonging and connection. We see you. You can always reach out to the People Team about any negative feelings and receive the right support.

Misuse of drugs and alcohol

In order to guarantee safe working conditions for all our colleagues the misuse of drugs and alcohol is not tolerated. Any misuse may impair your judgement as well as your ability to perform your work or function in a professional environment. If you witness such misuse or have concerns that such a misuse might exist, please contact your line manager or [raise a concern](#).

Violence and threatening behaviour

We have zero tolerance for any acts of violence or threatening behaviour in the workplace. It is prohibited to carry weapons of all kinds on Company property or while engaged in business on the Company's behalf.



RESPONSIBILITY

Health & Safety related responsibilities of all employees

- Comply with all policies and procedures related to health, safety and the environment
- Alert your line manager immediately about possible hazards
- Do not tolerate any misuse of drugs & alcohol
- Do not tolerate any workplace violence or threatening behaviour
- Report intolerable behaviour to help affected colleagues

3.7 Company Property

Please remember that our company is a community and we are all responsible for our well-being.

You are entrusted with protecting the Company's property and you should treat and handle all assets and systems with the same care as you would at your own home ensuring its efficient use.



RESPONSIBILITY

Responsibilities when using and working with Company assets

- Handle and treat them with care.
- Always be honest using them for legitimate business purposes.
- Never engage in theft, destruction or misappropriation.
- Never falsify records
- Never alter and substitute records for the purpose of concealing illegal activities
- Never send, download or store dangerous or compromising content

Our systems are intended for business purposes.

However, you may use those systems **for limited personal reasons**, so long as that use does not

- interfere with your work
- disturb your colleagues or our general business affairs.

Be aware that all usage of the Company's systems is not private and that all information transmitted or stored on the Company's electronic devices are lastminute.com property. You acknowledge that the Company owns and has all rights to monitor, inspect, disclose and expunge all electronic files and records on Company systems to the extent permitted by any applicable laws.

4. PARTNERS, SUPPLIERS AND BUSINESS CONDUCT

4.1 Conflicts of interest

A conflict of interest is any situation in which:

- you engage in an activity that interferes with your employment performance, or
- you have a personal or financial interest that might influence your proper judgement.

Conflicts of interest can arise in many ways and you are responsible for them.

There are times when **apparent conflicts may be resolved** simply by disclosing them and other times when there is a need to eliminate the conflict. If someone close to you is working in the same industry you should guard against inadvertently disclosing confidential information.

Disclosure of any potential conflict of interest is important to make sure that there are no improper communications or conflicted loyalties.



GUIDELINE

Here are the principles you need to follow:

- Avoid activities or financial interests that interfere with your job performance, your loyalty to lastminute.com or the judgments you make on our behalf.
- Do not take personal advantage of business opportunities.
- Disclose any potential conflict of interest to your supervisor or a HR representative.

Minor Investments

Investing in or lending money to a competitor, supplier or customer is prohibited.

Exceptions are **minor investments** in public securities.

- **An investment is “minor” if it is in an amount that will not influence your decisions on our behalf, and could not influence the decisions of the company in which you have invested.**
- Typically, this means investments of less than 1% of the outstanding shares (with a maximum of 1,000,000€) of a publicly-traded company.

These limits do not apply to investments through mutual funds, which are allowed without regard to investment value. If you have holdings that are (or grow to be) greater than these limits, you should notify your supervisor promptly. If you have any doubt concerning a potential conflict of interest or regarding the limits of a minor investment, please use the [Inquiry Form](#) of the Integrity helpline or contact the [Legal Department](#).

4.2 Nepotism

Nepotism is the practice of using your power or influence to favour someone close to you, especially by giving them jobs or contracts.

We do not strictly prohibit the employment or retention of relatives, or consensual relationships between co-workers. However, it is important to take precautions to ensure that individuals are not improperly influenced by the existence of close personal relationships.



RESPONSIBILITY

Employees' obligations to avoid nepotism

Do not directly participate in job relevant decisions of someone you have a close personal relationship with, that is e.g. supervising, hiring, promoting a family member or friend.

4.3 Gifts, Entertainment and Improper Payments

Giving and receiving gifts or entertainment can be an integral part of doing business, especially when building business relationships. It could be something like a lunch or drinks, or tickets to sporting events and concerts. These are generally considered to be a normal part of standard industry practices, and can be accepted or given as long as they are not trying to influence someone's proper judgement or at the expense of others. To avoid doubt please adhere to the following rules.



RESPONSIBILITY

Employees' obligations concerning gifts and payments

Do not accept compensation, in any form, for services performed for the Company from any source other than the Company.

Please adhere to the following principles and do not accept gifts:

- from anyone desiring to deal with the Company.
- that would create a conflict of interest or improper influence.
- of cash or cash equivalents.
- with a nominal value of more than EUR 150,00 or foreign currency equivalent.
- which are inconsistent with accepted and customary business practice.
- that are given overly frequent from one source, creating a pattern.
- which are given secretly.

This list is not exhaustive. In order to help you identify appropriate gifts, please have a look at our [Anti-corruption, anti-bribery and anti-money laundering Policy](#) under point 8. "Gifts, hospitality and expenses".

4.4 Bribery and Corruption

Giving or receiving any payment or gift in the nature of a bribe, kickback or other improper influence is absolutely prohibited. We take a **zero tolerance stance towards any acts of bribery or corruption** and we will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We ensure regular training of all our employees on anti-bribery and anti-corruption topics while maintaining management control systems and disciplinary procedures to discourage any acts of bribery and corruption.



RESPONSIBILITY

Employees' responsibilities: When dealing with third parties

- the Company's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the business relationship and as appropriate thereafter.
- the Company's expectation that our suppliers and business partners adhere to all applicable anti-bribery regulations maintaining adequate anti-bribery standards must be communicated.
- the Company ensures that the compensation to our suppliers is appropriate and for legitimate services only.

During everyday business employees might face some **potentially risky situations** from an anti-bribery or anti-corruption perspective. Please find the box below possible red flag scenarios that may be indicators for imminent bribery or corruption.

EXAMPLES OF RED FLAG SCENARIOS:

A third party insists on or requests:

- receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us.
- payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- that payment is made to a country or geographic location different from where the third party resides or conducts business.
- an unexpected additional fee or commission to "facilitate" a service; "facilitation payments", also called "speed" or "grease" payments, are payments made to secure or expedite the performance of a routine or necessary action to which the payer is entitled by law or otherwise. These types of payments, while accepted in some cultures as normal "costs of doing business", are illegal and contrary to our value.
- that a payment is made to "overlook" potential legal violations.
- the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- payments for goods or services not rendered or not received, or payments made to a party other than the service provider. Payments for goods and services shall be made only through approved and documented payment procedures.

This list is not exhaustive. If you encounter any of these red flags while working for us, you must [report them promptly](#) through our Integrity Helpline. For more information please refer to our [Anti-corruption, anti-bribery and anti-money laundering Policy](#).

4.5 Payments and Expense Accounts

Payments on behalf of the Company may be approved only for the purpose described by the supporting documents. Employees should request **reimbursement for business-related expenses** in strict accordance with the [Company's travel](#) and entertainment policies.

4.6 Workplace Fraud

It is fundamental that we are all committed to preventing and detecting workplace fraud which involves **dishonesty and deception intended to result in financial or personal gain** or some other unfair advantage. To minimise any adverse consequences we provide training and we have implemented internal control mechanisms to detect fraud risks to our business.

If you suspect or detect any cases of workplace fraud please [raise a concern](#) via our Integrity Helpline using the Whistleblowing Channel.

4.7 Money Laundering, Suspicious payments and Tax Evasion

We take a zero-tolerance approach to being involved in illegal or illicit activity and fully comply with all applicable laws and regulations on financial crime like money laundering and tax evasion in the jurisdictions where we operate.

Money laundering is the process by which the proceeds of crime (which could be money or an asset) and/or the true ownership of those criminal proceeds are disguised so that they appear to come from a legitimate source.

Tax evasion is the act of deliberately not paying or reducing the amount of tax that you have to pay by using illegal methods like concealing income and information from tax authorities.

Suspicious payments encompass transactions that exhibit certain characteristics warranting caution. These characteristics may include payments involving unknown or unnecessary intermediaries whose roles remain unclear to you or payments to or from other countries lacking an apparent connection to our business.

Also watch out for payments in currencies other than those specified in the invoice or contract, payments to or from individuals not party to the transaction, and payments without an invoice containing a clear description of the service rendered. Recognizing these attributes is critical in identifying potentially dubious or unauthorised financial activities.

In order to combat financial crime we maintain appropriate internal control systems and we ensure that all our employees receive adequate and regular training on these topics.



Employees' responsibilities concerning financial crime prevention

- Ensure to conduct business only with reputable partners involved in legitimate business activities using legitimate funds.
- Ensure to make payments for goods and services only through approved and documented payment procedures.
- Do not assist third parties to evade taxes.

- Never participate in any transaction that appears to conceal illegal conduct or uses proceeds of illegal origin.
- Do not undertake actions that would undermine an obligation to pay taxes.
- If you are unsure whether a transaction might involve any form of financial crime please contact our [Legal Department](#) or [raise a concern](#) via our Integrity Helpline immediately.

These lists are not exhaustive. For more information please refer to our [Anti-corruption, anti-bribery and anti-money laundering policy](#).

4.8 Insider Trading

Employees, officers and directors have to strictly comply with insider trading rules. An [Insider Trading Policy](#) has been set up to be complied with strictly.

Insider trading is the buying or selling of a security like shares or debt instruments by someone who has access to "Material Inside Information" about that security.

Material inside information is confidential information which, if made public, may have a significant effect on the market price of securities admitted to trading.

EXAMPLES FOR MATERIAL INSIDE INFORMATION:

- Significant changes in the Company structure e.g. mergers, acquisitions, reorganisations
- Changes in the Company's capital position
- Relevant changes in the Company's earnings situation
- Relevant changes in the Company's course of business
- Unforeseen changes in the Company's Board of Directors



In order to comply with Insider Trading Rules it is prohibited:

- to exploit Material Inside Information, to acquire or dispose of securities.
- to communicate Material Inside Information to others.
- to exploit Material Inside Information to provide advice to others with respect to acquiring or disposing of securities.

These lists are not exhaustives. For more detailed information please refer to our [Insider Trading Policy](#).

4.9 Political Activities and Lobbying

lastminute.com's policy is to take a politically neutral stance and it does not contribute financially to any political parties or candidates.

Employees are free to participate in political, lobbying or advocacy activities in their own time and with their own resources as private citizens.

What is the difference between Advocacy and Lobbying?

Advocacy is public support for an idea, plan, or way of doing something. It means in general sharing best practices and success stories, including model legislation. An example of advocacy is promoting sustainable tourism.

Lobbying is a special form of advocacy attempting to influence specific legislation to one's own advantage, contacting legislative staff either directly or urging the public to contact them. An example of lobbying is trying to get a tax break on certain services provided by your company.

The Company abides by all lobbying laws. Employees may only participate in lobbying and advocacy activities in the name of our Company and with authorisation from the [Legal Department](#). These activities should be done through official channels only, like industry associations or similar institutions.

4.10 Privacy and Data Protection

We are committed to comply with the privacy and data protection standards of each country where our employees are located. Even in countries with high privacy standards, we cannot guarantee the confidentiality of the use of our systems. Email and voicemail messages and internet usage are potentially subject to interception and to disclosure to others during lawsuits or investigations. Also, where legally permitted, we may verify our employees' use of our systems for legitimate business purposes. This includes, for example, seeking to prevent suspected illegal conduct or other misuses of the systems or to ensure that we are properly responding to our customers and other business contacts.

Processing of personal data

Anyone processing personal data within the Company must comply with the principles stated by the European General Data Protection Regulation (GDPR) and other applicable data protection law, independently where our employees are located and where the data is collected, handled or stored.



RESPONSIBILITY

Personal data collection and handling

Anyone collecting or handling personal data must ensure:

- to process personal data fairly and in an unambiguous and transparent manner.
- to process personal data for limited purposes and in an appropriate way.
- to process personal data lawfully which means inter alia the explicit consent of the data subject is needed.
- that the data collection is adequate, relevant and non-excessive.
- that personal data is not kept longer than necessary for the purpose.
- that the personal data is kept in a secure manner.

For further information please refer to our [Data Protection Master Policy](#) as well as our internal [Data Protection guidelines and policies](#). Please remember, **data incidents and security risks have to be reported promptly to the DPO** at dpo@lastminute.com.

4.11 Confidentiality

Employees must maintain the confidentiality of confidential information entrusted to them by the Company or its customers, except when disclosure is authorised by the Company Lawyer or required by laws or regulations.

Confidential information includes:

- all non-public information that might be of use to competitors, or
- harmful to the Company or its customers if disclosed.
- It also includes information that suppliers and customers have entrusted to us.

The obligation to preserve confidential information continues even after employment ends. It's contained within the confidentiality agreement you signed when you joined.

Intellectual property and proprietary information

Like all company property, proprietary information and intellectual property must be protected and kept at our offices except as necessary for business purposes, they are among the most valuable of the Company's assets. Examples include copyrights and trademarks such as our logos and the name "lastminute.com" which are recognised around the world.



RESPONSIBILITY

Employees intellectual property and responsibilities concerning proprietary information:

- Safeguard intellectual property such as copyrights, trademarks and patents and use them in a responsible way.
- Never download, send or store copyrighted materials, trade secrets or similar materials without proper authorization.
- Protect trade secrets such as pricing plans, products & services under development, prospective acquisitions or divestitures.
- Use proprietary information or intellectual property belonging to someone else only in compliance with applicable laws and agreements. This might include copyrighted materials related to a licence agreement, or information learned in the course of a proposed acquisition.
- Report any infringements to your supervisor or [raise a concern](#) via our Integrity Helpline as violations may result in significant civil and even criminal penalties for both you and the Company.

Be aware that all documents that you acquire or create in the course of your employment belong to lastminute.com. If you have any questions about the use of someone else's proprietary information or intellectual property, you can [use the Inquiry Form](#) in our new Integrity Helpline.

4.12 Fair Dealing

We seek to outperform our competition fairly and honestly and we refrain from any unfair dealing practices. We are committed to long-lasting and successful business relationships with all our partners and we comply with our suppliers' Code of Conduct if necessary.



RESPONSIBILITY

Employees' obligations concerning Fair Dealing

- Respect the rights of and deal fairly with the Company's customers, suppliers and competitors. E.g. we respect the payment deadlines of our suppliers if the contract was fulfilled correctly.
- No employee should take unfair advantage through unfair dealing practice such as manipulation, concealment, or abuse of privileged information.
- Stealing proprietary information or inducing such disclosure by past or present employees of other companies is prohibited.
- Abstain from unfair business practices and agreements restricting competition.

Sensitive Information

Collaboration on or discussion of certain sensitive topics with competitors can be illegal. Sensitive information include pricing policies, terms and conditions, costs, marketing plans, market surveys and studies and any other proprietary or confidential information.



RESPONSIBILITY

Employees' obligations concerning sensitive information.

Employees' must:

- in all contacts with competitors avoid discussing sensitive topics.
- leave the meeting if necessary.
- tell the competitor that under no circumstances they can discuss these matters.
- not participate in any illegal activity with competitors.
- immediately [report any incident](#) via our Integrity Helpline.

Competition Law and Conduct

Laws governing competition exist in most of the countries in which lastminute.com does business.

The **purpose of competition laws**, which may also be known as antitrust, monopoly, fair trade or cartel laws, is:

- to prevent interference with the functioning of a competitive market system and
- to go beyond consumer welfare protecting other values such as individual freedom.

Under these laws, **companies may not enter into agreements with competitors**, customers or suppliers, however informally, **that restrict the functioning of the competitive system**.

These and any other agreements that would limit competition are highly questionable if not illegal. Under no circumstances shall you engage in prohibited anti-competitive behaviour. If you have any questions regarding your actions in light of the antitrust laws, you should contact the [Legal Department](#).

EXAMPLES OF SUCH PROHIBITED ACTIVITIES INCLUDE:

- agreements between competitors to divide markets, to divide customers or to restrict their output; or a
- company's agreement with its suppliers that they will not sell to its competitors.

Monitoring and gathering information about competitors

Monitoring and gathering of information about competitors is legitimate and necessary to better understand the market. However, there are some guidelines you should follow.



GUIDELINE

Guideline for information gathering about competitors:

- Never attempt to acquire information illegally or unethically.
- Be honest when gathering competitive information, never pretending to be someone you are not in order to obtain information.
- Never ask a current or former employee of one of our competitors to violate their confidentiality obligations.
- Do not hire someone from a competitor in order to obtain trade secrets or confidential information.

If you have any questions regarding this please contact the [Legal Department](#).

Contracting with Third-parties

Whenever entering into contracts with third parties, we have certain obligations to fulfil. In order to effectively manage financial, legal and commercial risk it is necessary to follow our internal policies and procedures. The contractual conditions are based on objective and impartial evaluations as detailed in our [Group Procurement Policy](#) and the related [Procurement Procedure](#).

Our purchase policies do not encourage potential adverse impacts on human rights or the environment and we ensure reasonable, non-discriminatory and fair contractual provisions for all our partners.

Our procurement operations are managed through our automated purchasing procedure, with the goal to assure compliance with all applicable laws such as the GDPR framework.

GUIDELINE

Guideline for contracting with third parties:

- Ensure contracts are reviewed and approved by the appropriate people by using our automated purchasing procedure.
- Ensure contracts are signed by authorised signatories for the relevant contracting entity.
- Never sign any contract on behalf of our Company unless you have confirmed you have the authority to do so.
- Report any suspected or known policy violations to your line manager, the [Legal Department](#) or [raise a concern](#) via our Integrity Helpline.

Supplier due diligence evaluation is carried out on both current and prospective suppliers ([Supplier Management Policy](#)). Suppliers are assessed for honesty, integrity, compliance and confidentiality when we sign them up and we also do a yearly review of risks including credit and reputational risk if the relationship continues.

Ethical Business behaviour for people in commercial roles

Dealing with prospective and existing partners, employees in commercial roles are potentially exposed to counterparty misconducts. This is why some specific principles have been developed to ensure their actions align with our company's strategy and uphold the highest standards.

Principles for sales people and colleagues in commercial roles:

Consistency: The selection and onboarding of new partners as well as the relationship with existing partners has to be consistent with the Company's commercial strategy as well as with quality standards, if any, defined by each department.

Accuracy: It's your responsibility to guarantee the accuracy and completeness of all information concerning our partners adhering to internal guidelines and procedures for recording, storing and updating related data and documentation.

Transparency: Use only official communication channels when starting or maintaining commercial relationships, emails being the preferred means of communication.

Sensitivity: If a partner's behaviour may give rise to concern in terms of legal compliance or ethical misconduct, it is your responsibility to report your concerns to your line manager, or [raise a concern](#) via our Integrity Helpline.

5. CUSTOMERS

Our customers are at the heart of everything we do, and making sure they enjoy the best travel experience possible is fundamental to our business. We care for their health and well-being and we handle our customer relationships with the highest level of business integrity.

5.1 Our products

As an online tech travel company our customers can rely on our long-term global experience dating back to the nineties. Our proprietary Dynamic Holiday Packages technology allows us to create meaningful savings for our customers, generating loyalty and satisfaction by providing a virtually unlimited and flexible choice of travel services and products. Our in-house customer care team are on hand to help if help is needed.

We ensure that the composition, design and commercialisation of our products and services is in line with EU law and does not lead to adverse impacts, either for individuals or communities.

5.2 Customer Care

Customers attach more importance than ever before to their travel schedule and related services. Their constant demand for efficient and effective customer care service is front and centre of our customer strategy and objectives.

To provide the best customer care services we provide a wide range of complaint channels, servicing hours and special assistance.

We are always committed to helping customer by:

- applying the highest level of business integrity.
- emphasising the power of listening with an extended program of surveys.
- Improving our services based on our customers' feedback.

5.3 Customer Data Privacy

As an online travel company we collect and process a huge amount of personal information, putting great emphasis on data security.

We ensure our **customers' data privacy rights** by applying the highest standards, being compliant with the **European General Data Protection Regulation** (GDPR) - one of the strictest and most comprehensive data protection laws of the world - as well as with all other local applicable regulations.

GUIDELINE

How the Company ensures customers' data privacy:

- We ensure appropriate security measures safeguarding all personal data against unauthorised processing.
- We ensure transparency by notifying and disclosing to our customers (via our Privacy Policies) when and how their personal information is collected and processed.
- We collect only the minimum amount of customer data necessary to achieve specific business purposes.
- We give customers the option of having their personal information included on or removed from lists used for marketing, as required by law.
- We provide customers with reasonable access to their personal data.

This list is not exhaustive. For more details please refer to the European General Data Protection Regulation ([GDPR](#)) and other applicable local laws.

6. SOCIETY AND COMMUNITIES

6.1 Local communities

As a travel tech company with offices located internationally and helping travellers to reach destinations all over the world, we are committed to creating positive impact within local communities both where we operate and at destinations.

We intend to make a meaningful, long lasting and sustainable economic contribution to local communities. We want to build strong local relationships with our stakeholders by adapting to local culture and requirements and adding value to places visited by our customers, by contributing to new job opportunities for example.

How can we all contribute to creating positive impact within local communities?

We engage in different local projects, from beach cleanups to recycling, to support local communities in their efforts to protect the environment and we collaborate with local charities via volunteering activities.

That's why we encourage you to use your **time to give back by volunteering** for activities of their choice.

We believe that participation in volunteering programmes can have a **positive impact on local communities** and can help develop competencies and enhance soft skills for everyone involved

Volunteering usually takes place during working hours for **up to 2 days** and employees can become part either in Company-sponsored volunteering projects or create their own project together with the lastminute foundation as well as work in an organisation of their own choice.

For more details please refer to our [Corporate Volunteering Policy](#).

Furthermore, we all should **integrate social sustainability aspects into our business and everyday choices**.

For example by buying locally and therefore supporting local shops and their owners within our neighbourhood or by selecting local business partners in our destinations we help to ensure that profits don't leave the country but benefit local communities.

6.2 Contacts with the media

Only authorised employees may communicate with the media. We have specific spokespeople, per country, who are authorised, and trained, to talk on behalf of the company.

You must also **get express prior approval** to present financial information and results, including projections, forecasts, and forward-looking statements, to all external parties, be it at an event presentation or in a business meeting.

As a publicly listed company on the Six Swiss Exchange, we comply with their rules to ensure all our reports and press releases are issued in the correct manner at the appropriate time. You can find all the latest reports and news on our corporate website.



RESPONSIBILITY

Refer ALL media inquiries, particularly concerning financial or other confidential matters, to the Corporate Communications team at corporatepr@lastminute.com.

Social Media

Social media plays a crucial role in exchanging ideas and building relationships in private as well as in professional life.

However, we have to act in a responsible way protecting confidential information and exercising common sense when participating in social media.



RESPONSIBILITY

Employees' social media responsibilities

- You are personally responsible for your public comments in the Internet.
- Exercise sound judgement and common sense at all times when posting content. Always ask yourself whether your content might be offensive to someone or have a negative impact on our stakeholders.
- Do NOT disclose proprietary or confidential information about the Company, its business partners and customers.

Be aware of potential conflicts of interest:

- Ensure that views expressed in your personal postings or blogging are NOT made on behalf of or endorsed by the Company.
- Be clear about your affiliation when making positive statements about the Company.

7. SHAREHOLDERS, FINANCIAL INSTITUTIONS, GOVERNMENT AND SUPERVISORY AUTHORITIES

We maintain an active and continuous dialogue with shareholders, financial institutions and other members of the financial community and we closely cooperate with all regulatory bodies and authorities on all legal matters.

7.1 Contacts with the financial community

Only authorised employees may communicate with the financial community.

You are not to provide information or respond to inquiries from financial community without proper authority:

- Refer inquiries from financial institutions, brokers, analysts, commentators, shareholders or other members of the financial or investment communities to Investor Relations, the Chief Financial Officer or a company lawyer. This includes requests to visit any of our locations.

7.2 Books and Records

Accuracy and Completeness

Each employee, officer and director must do his or her part to ensure that the books of account and financial and non-financial records of the Company meet the highest standards of accuracy and completeness. The responsibility does not rest exclusively with the Company's accounting personnel.



RESPONSIBILITY

Responsibilities of all employees concerning Books & Records

Report to your supervisor or [raise a concern](#) through our Integrity Helpline:

- if you have reason to believe that any of the Company's books and records are not being maintained in an accurate or complete manner.
- if you feel pressured to destroy documents which would normally not be destroyed.
- if you become aware that any misleading, incomplete or false statement was made to an accountant, auditor, attorney or government official.

Financial and Non-Financial Statements and Accounts

All employees who are involved in supplying any kind of supporting documentation, determining account classification or approving transactions will be held responsible for ensuring that transactions are reported accurately, completely and in reasonable detail.

All transactions must be recorded appropriately to ensure full accountability for all assets and activities of the Company and to supply the data needed in connection with the preparation of financial statements.



RESPONSIBILITY

Special duties of employees involved in the Company's disclosure process

- You have to be familiar with the disclosure requirements applicable to the Company.
- Prepare financial and non-financial statements according to generally accepted accounting principles and other applicable standards.
- You have to comply with the internal disclosure controls and procedures.
- Never knowingly misinterpret or cause others to misinterpret facts about the Company, including auditors and governmental regulators.
- Properly review and critically analyse information intended to be disclosed in order to ensure completeness and accuracy.
- Failure to do so could result in liability for the Company and loss of confidence of investors and business partners.

Retention of Documents

Document and records must be retained for the periods of time specified by the Company.

Also, if you are aware of an imminent audit or examination initiated by the Company or any supervisory agency, you should retain all documents and records in your custody or control relating to the matter under review. Please note that the destruction or falsification of a document in order to impede an audit or examination may lead to prosecution for obstruction of justice. If you are not sure that a document can be destroyed, consult your supervisor, a company lawyer or [use the Inquiry Form](#) in our Integrity Helpline before doing so.

7.3 Disclosure obligations and procedures

The Company's policy is to release data of public importance at the earliest appropriate time consistent with the need to both

- maintain the confidentiality of information before final decisions are made and
- to avoid endangering the Company's business through disclosure of information potentially advantageous to competitors.

The Company thereby strictly complies with the ad-hoc publicity rules of SIX Swiss Exchange. Information that might have an impact on the market for lastminute.com securities (i.e. information that might be price sensitive information) may be released only through the Chairman, Chief Executive Officer, Chief Financial Officer, or Company Lawyer. Only they can ensure that all the rules set by SIX Swiss Exchange are complied with.

7.4 Payments to government personnel to induce favourable behaviour

It is **strictly prohibited to give or promise anything of value, directly or indirectly**, to officials of any government or political candidates in order to obtain or retain business and to make illegal payments to government officials of any country.

In addition, State and local governments, as well as foreign governments have a number of laws and regulations regarding business gratuities which may be accepted by government personnel or personnel of companies. The promise, offer or delivery of a gift or favour in these cases would not only violate Company policy but could also be a criminal offence. If you need guidance in this area please [use the Inquiry Form](#) in our new Integrity Helpline.

7.5 Cooperation with government investigations or inquiries

If we receive inquiries from governmental agencies responsible for enforcing the law or that the Company is the target of a government or regulatory agency investigation, you have the following obligations.



RESPONSIBILITY

Employees' obligations during government investigations or inquiries:

- Fully cooperate with the agencies and authorities involved by responding truthfully, promptly, accurately and in a transparent way to any inquiries and providing all requested information.
- Immediately contact and seek advice from the [Legal Department](#) or [raise a concern](#) via our Integrity Helpline.

We have zero tolerance for retaliation for those cooperating with a government investigation or inquiry. If you experience any retaliatory actions please report them directly to our line manager or [raise a concern](#) via our Integrity Helpline.

The Company also ensures the protection of rights of individuals being subject to investigation.

7.6 International Trade

We are subject to a huge variety of laws, customs and regulations in the countries where we operate. It is therefore the responsibility of the business owner to understand and comply with applicable laws of those countries. Please contact our [Legal Department](#) immediately if the principles of this Code appear to conflict with local laws.

Import and export

The Company is committed to complying with all applicable import and export legislation. If your role involves sending and receiving goods such as technological devices, software or other equipment across national borders you have to learn and understand the applicable laws and act accordingly. Please contact our tax team within the Finance Department if you have any questions regarding import and export matters or issues.

Trade sanctions, embargoes and boycotts

International trade laws can be complex and difficult to navigate. Trade sanctions such as embargoes may be upheld by countries where we operate.

Trade sanctions restrict trade activities with foreign targets in order to achieve certain political or diplomatic goals. Mostly there designed to punish the respective country or individual e.g. imposing export or import restrictions, introducing tariffs and quotas or asset freezes.

An embargo is a severe form of trade sanctions officially banning trade or other commercial activity with a particular country. They are mostly implemented due to objectionable foreign policies pursued by the target country.

We seek to comply with applicable embargoes and trade sanctions maintained by the countries where we operate such as the EU, UK, the Netherlands, Switzerland and the UN.



RESPONSIBILITY

Employees' responsibilities concerning international trade laws:

- Contact the [Legal Department](#) before making any decisions that could fail to comply with applicable international trade law.
- Violations can lead to severe penalties and damage to the Company including jail sentences.

A boycott is the withdrawal from commercial relationships with a country, government, organisation, business or an individual person as an act of punishment or protest.

It is our obligation to avoid participating in any illegal or unsanctioned boycotts. [Raise a concern](#) through our Integrity Helpline immediately if you are asked to participate or agree to a boycott.

8. ENVIRONMENT

As a member of the travel industry we have a particular responsibility when it comes to taking care of the planet. The human desire to travel and see new places is undiminished, but we need to protect it for future generations of adventurers.

We are aware of major environmental issues facing society as well as of **our direct and indirect impact on the environment**.

We are committed to a transparent dialogue with all our stakeholders reporting our environmental performance such as our emission data and **we tackle our direct impact** by:

- measuring and reducing our corporate carbon footprint.
- being more responsible in the use of resources.
- encouraging the principles of a circular economy within the scope of our Company's assets.
- setting clear and feasible goals for contributing to the Paris Agreement on Climate Change .
- training and involving our colleagues regarding responsible care of the environment.

Disseminating knowledge by empowering our customers to make more environmentally responsible choices and suggesting to embed sustainability considerations into the selection of our business partners such as environmental certifications helps us to mitigate our **indirect impact** on the environment.

We acknowledge that the effects of tourism are far-reaching, on the one hand offering immense opportunities like employment - on the other hand, the environment suffers, amongst others, from increased pollution and emissions.

By raising awareness and promoting **sustainable forms of tourism** we, for example:

- educate customers about their carbon footprint.
- provide dedicated information hubs with tips and recommendations.
- offer alternative mobility options through our platforms.

We also encourage our suppliers to reduce their adverse impact on the environment.

Most importantly, **everyone can contribute** to fostering environmental sustainability by embracing sustainable habits in our offices as well as in our everyday lives. We ask our employees to help us to achieve true change by adoption habits that champion environmental sustainability.



Everyone's responsibilities related to environmental sustainability

Do not engage in activities or contribute to any behaviours that may harm the environment.

Uphold environmental principles in your daily work and life such as:

- separating waste correctly using the corresponding bins.
- avoiding waste by using reusable containers, bottles etc.
- saving resources, responsibly using electricity and water.
- reusing your belongings in a creative way, repairing or donating them whenever possible.
- commuting in a green way if possible using alternative mobility options.

If you are a line manager: be a role model for respecting environmental principles.

9. WAIVERS OF THE CODE OF CONDUCT

Any waiver of this Code for executive officers or directors shall be approved only by the Board of Directors or a committee of the Board of Directors and will be promptly disclosed as required by law or SIX regulation.

10. CONTACTS

For any information or question about the lastminute.com Code of Conduct, please write an email to sustainability@lastminute.com.

lastminute.com