
Public Affairs Policy of lastminute.com

1. PURPOSE AND SCOPE

1.1 Definition and Purpose of the Policy

This Public Affairs Policy (the “**Policy**”) sets out how lastminute.com N.V. (the “**Company**”) and its subsidiaries (together, “**lastminute.com**” or the “**Group**”) interact with public institutions, private organisations, industry associations, and regulatory bodies within the scope of activities set out in section 1.2

It provides a common framework for managing direct and indirect forms of engagement, including lobbying, advocacy, and participation in trade or industry associations, in every country where the Group operates or holds an interest.

1.2 Activities covered by the Policy

The Policy governs all public affairs activities carried out by the Group. These include monitoring, anticipating and influencing public policy and regulatory developments that may impact the Group’s business, operations or reputation. In this specific perimeter, it also encompasses the management of communication and relationships with external stakeholders such as regulators, policymakers, the media, partners and the wider public.

1.3 Why the Policy is important

The Group recognises that public affairs are closely linked to its business objectives and values, and that all related initiatives should generate lasting, positive impact for its stakeholders.

The Policy provides guidance for the Group’s advocacy on public policy matters, its promotion of digital transformation within the tourism sector, and its alignment with broader social and environmental priorities.

By engaging externally in an accurate manner, lastminute.com aims to build trust, transparency, and mutual understanding with stakeholders, thereby strengthening its reputation, internal cohesion and employee engagement.

1.4 Target audience

This Policy applies to all employees, executives and contractors involved in external communications, lobbying or stakeholder engagement, including government relations, regulatory affairs, industry advocacy, corporate reputation management and issue or crisis communication.

2. GUIDING PRINCIPLES

The Group’s public affairs activities are grounded in a commitment to constructive, transparent and ethical engagement with all stakeholders.

These guiding principles ensure that every interaction fosters informed dialogue, provides relevant and accurate information on issues affecting the industry, and contributes to a fair and effective regulatory environment.

The Group’s approach is built on the following core principles:

- **Transparent dialogue:** open and honest communication with stakeholders, underpinned by active listening and constructive contribution.

- **Compliance:** full adherence to all applicable international laws at the Group level, including those on lobbying and anti-corruption.
- **Sustainability and Social Responsibility:** advocacy for public policies aligned with the Group's environmental, social and governance ("**ESG**") objectives.
- **Integrity:** maintaining the highest ethical standards in all interactions with policymakers and stakeholders.

In line with these principles, the Policy focuses on topics relevant to the Group's business, including financial regulation, technology, and climate policy, and requires that all advocacy and lobbying activities are conducted in accordance with the Company's [Code of Conduct](#) and ethical standards. Any form of improper or undue influence is strictly prohibited.

Furthermore, lastminute.com does not permit any contribution or donation, whether in cash or in kind, to political parties, election campaigns or public officials, either directly or indirectly, in any jurisdiction where it operates. For more detailed guidance, please refer to the Group's [Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy](#).

3. ROLES AND RESPONSIBILITIES

All public affairs activities must comply with the Policy and with the Company's Code of Conduct. Only individuals or teams formally authorised by the Sustainability and Public Affairs Team may represent the Group in such external engagements.

Sustainability and Public Affairs Team

The team is responsible for defining the Group's public affairs strategy, ensuring internal alignment, and maintaining the register of authorised individuals and teams. It also coordinates activities across functions and prepares reports on public affairs matters for the Company's management and the Board of Directors (the "**Board**").

Public Affairs Committee

The Public Affairs Committee (the "**Committee**"), composed of representatives from across the business, complements the Sustainability and Public Affairs Team by providing expertise in legal matters, public relations and stakeholder engagement, and ultimately participating in the definition and implementation of the Public Affairs strategy.

Strategic Oversight

The Board retains overall strategic oversight of public affairs activities.

In particular, the Board's Ethics and ESG Committee monitors the Group's public affairs strategy and may recommend additional measures to ensure alignment with business and sustainability objectives. The Ethics & ESG Committee receives periodic updates from the Public Affairs Committee on key matters and ensures consistency with Group objectives, the Code of Conduct, and the Policy.

Engagement and Issue Management

Representatives authorised by the Public Affairs Committee are responsible for engaging with external stakeholders in line with approved mandates. They monitor, assess and report on relevant regulatory

and policy developments, providing timely updates to the Public Affairs Committee.

Employee Conduct

Employees representing the Group in public or institutional settings, whether planned or incidental, must comply with the [Code of Conduct](#) and the Policy.

All employees attending external events or interacting with the media as representatives of lastminute.com must also follow the Policy on [Speaking Opportunities and Media Interaction](#).

Additionally, employees planning to engage in public affairs activities must seek prior approval from the Committee by writing an email at publicaffairscommittee@lastminute.com. Responses are generally provided no sooner than two weeks, depending on the complexity of the request.

Personal advocacy outside work is permitted, provided it is not conducted on behalf of the Company.

Community and Civil Society Engagement

Public affairs activities involving civil society organisations or philanthropic initiatives must align with the Group's ethical commitments and strategic priorities in areas such as education, social inclusion, sustainability, and digital transformation. Initiatives promoted in the name of lastminute.com require approval from the Sustainability and Social Responsibility team by writing an email at sustainability@lastminute.com.

4. COMPLIANCE AND RISK MANAGEMENT

lastminute.com is committed to full compliance with all applicable regulations and international standards governing lobbying and public engagement. Activities reviewed by the Public Affairs Committee are also assessed from a risk and compliance perspective by the Risk, Information Security, Controls & Internal Audit Team and the Business Legal Team.

Risk management and compliance assessments include, but may be not limited to, the following areas:

- **Anti-Money Laundering (AML) and Anti-Bribery and Anti-Corruption (ABAC):** ABAC focuses on preventing the improper influencing of public officials through the offering of any form of advantage, while AML addresses the risk that advocacy channels, consulting fees or related transactions may be used to conceal or disguise the origin of illegally obtained funds. Both are essential to safeguarding the Group's integrity.
- **Reputational risk:** risks arising from inappropriate advocacy practices or any perceived lack of transparency.
- **Legal and regulatory risk:** risks stemming from non-compliance with applicable regulations, including, but not limited to, failure to accurately register with mandatory Transparency Registers, validations of sector-specific regulations (e.g. consumer protection and data privacy), or non-adherence to competition laws.