
Report on Child Labour Due Diligence in the Supply Chain FY 2025

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1. About This Report

1.1 Purpose and legal basis

This report satisfies the due diligence and annual reporting requirements on child labour as set out in Articles 964j–l of the Swiss Code of Obligations and the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour ("DDTrO"). The reporting entity is BravoNext SA, domiciled in Chiasso, Switzerland.

1.2 Scope of reporting

In the interest of transparency, consistency, and ethical responsibility, the due diligence processes and information presented in this report cover all Group entities, not solely the entities with formal legal obligations. This reflects our integrated approach to compliance and our group-wide commitment to responsible business practices. A full list of Group legal entities is provided in Annex I.

The data and insights in this report pertain to the fiscal year 1 January to 31 December 2025. Forward-looking actions already taken in early 2026 are noted as subsequent developments.

This report is publicly available on the lastminute.com corporate website, in the "About Us" section.

2. Our Group and Supply Chains

2.1 Our Group

lastminute.com is the European leader in Dynamic Holiday Packages. Our mission is to design, deliver and take responsibility for curated, integrated travel experiences so people can travel with confidence. The multi-brand group evolved through organic growth and strategic acquisitions; its parent company, lastminute.com N.V., is incorporated in Amsterdam and listed on the SIX Swiss Stock Exchange.

As one of the few fully licensed European players, the Group operates a 100% digital, asset-light business model, delivering travel products and services through a network of global suppliers and partners. — including airlines, hotels, tour operators, car rental companies, and experience providers. As a technology-driven business, the most significant human rights impacts of our activities relate to our own employees and to the workers of our direct suppliers.

2.2 Our value chain

Our value chain spans three areas: upstream, own operations, and downstream.

- **Upstream** activities involve the sourcing of resources and services that feed into our operations: travel and tourism services (transportation, accommodation, ancillary services), digital infrastructure, advertising, payment processing, and other corporate

support services. These partners are essential to our operations but may pose potential human rights risks, particularly where their own supply chains extend into regions with weaker labour protections.

- **Own operations** encompass the internal processes directly controlled by the Group, including software and product development, platform management, customer care, marketing, payment systems, and core business functions (Finance, HR, Legal, Compliance, Procurement, and IT).
- **Downstream activities** focus on delivering services to customers — distribution, sales, and the end-to-end travel experience. This encompasses service fulfilment through our travel partners, covering flights, accommodation, and ancillary services, and customer engagement driven by marketing, communications, and customer support activities.

3. Our Policies and Governance

Treating people with dignity and respect is a fundamental principle that guides everything we do. Our approach to human rights — encompassing forced labour, modern slavery, human trafficking, and child labour — is grounded in internationally recognised standards:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including ILO Conventions 138 (Minimum Age) and 182 (Worst Forms of Child Labour)
- UN Convention on the Rights of the Child (UNCRC)
- OECD Guidelines for Multinational Companies

3.1 Policy framework

Our human rights commitments are embedded in a suite of policies, all publicly available on the corporate website:

- **Human Rights Policy** (updated June 2025): our primary human rights commitment document, adopted by the Board of Directors. Sets out zero-tolerance on forced and compulsory labour, child labour, and all forms of exploitation, and extends these expectations to all business partners and suppliers.
- **Code of Conduct:** applicable to all employees, officers and directors. Establishes ethical and legal standards, provides reporting mechanisms, and explicitly prohibits forced labour, child labour, and exploitation within our workforce and supply chain.
- **Modern Slavery Act Policy:** specifically addresses the Group's responsibilities under the UK Act, clarifying obligations and outlining procedures for reporting suspected violations.
- **Whistleblowing Policy:** sets out the protections and procedures for employees and external stakeholders who report concerns, including anonymously.

3.2 Governance and oversight

Human rights governance at lastminute.com is integrated into the corporate structure at the highest level. The Ethics and ESG Committee — composed of at least two members appointed annually by the Board of Directors — is responsible for overseeing and approving the sustainability strategy, including human rights.

Day-to-day implementation is led by the Sustainability and Public Affairs team, working in close collaboration with the Legal team and the Risk, Information Security, Controls and Internal Audit team.

The Group established a dedicated Supervisory Body effective 1 January 2025 to oversee the Corporate Liability Model (described further in Section 4.6). It is composed of one member with an operational and managerial role, and one independent Non-Executive Director of lastminute.com N.V. providing impartial strategic oversight. The Body reports regularly to the Board.

3.3 Forced labour, modern slavery, and human trafficking

lastminute.com has zero tolerance for all forms of modern slavery, forced labour, and human trafficking. The Group strictly prohibits:

- All forms of forced or compulsory labour, including bonded labour, debt bondage, forced prison labour, and any arrangement in which workers are not free to leave or terminate their contracts
- Human trafficking — the recruitment, transportation, transfer, harbouring, or receipt of persons by means of coercion, fraud, or deception for the purpose of exploitation
- Any form of servitude or exploitation of workers within our own operations or supply chain

These prohibitions are reflected in our Code of Conduct, Human Rights Policy, Modern Slavery Act Policy, and Supplier Terms and Conditions. The Modern Slavery Act Policy specifically clarifies every employee's responsibility in observing and upholding the Group's position and provides procedures for reporting any knowledge or suspicion of a violation.

3.4 Child labour

lastminute.com condemns any work that deprives children of their childhood, potential, or dignity, or that is harmful to their physical, mental, social, or moral development. Our policy is grounded in ILO Conventions 138 and 182 and sets the following minimum standards:

- No person under the age of 15 shall be employed, except where national legislation permits a minimum age of 14 in accordance with ILO Convention 138
- Under no circumstances shall persons under 18 be employed in hazardous work or in roles that may compromise their physical or psychological wellbeing

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- The Group enforces minimum legal working age requirements in every operating country through standardised employment contracts

We expect all suppliers to explicitly prohibit child labour in their own operations and supply chains, maintain robust systems to verify worker ages, monitor their operations and those of subcontractors for child labour risks, and immediately notify lastminute.com of any actual or suspected incidents.

4. Risk Assessment and Due Diligence

Our approach to risk assessment and due diligence covers child labour, forced labour, modern slavery, and human trafficking. Because our methodology, tooling, and supply chain are shared, we conduct a single integrated due diligence programme rather than parallel processes. This section describes that unified approach, noting where specific elements are particularly relevant to one or the other obligation.

4.1 Risk profile — own operations

The Group's own employees are primarily office-based professionals based in Europe and India. The risk of child labour or modern slavery within the direct workforce is assessed as low. Minimum legal working age requirements are enforced in every operating country through standardised employment contracts applied at the onboarding stage. No instances of child labour, forced labour, or modern slavery were identified or reported in the Group's own operations during 2025.

4.2 Risk profile — supply chain

As a Travel-Tech company, we operate at the intersection of two large industries, each with a distinct human rights risk profile:

- **Technology and corporate suppliers:** a subset of our technology, software, and professional services vendors operate in or source from regions with elevated labour practice risks. These form the primary focus of our annual Tier 1 supplier assessment (Section 4.4). The most prevalent risk identified is not active child labour or forced labour, but rather gaps in suppliers' own governance — absence of human rights policies, lack of age verification procedures, and absence of grievance mechanisms — which limit early detection of potential issues.
- **Travel and tourism supply chain:** as an intermediary OTA, the Group facilitates bookings for services delivered by third parties. The global hotel, airline, and ground transport sectors are known to carry systemic labour rights risks, including in relation to migrant and seasonal workers, domestic workers in hospitality, and labour brokers in certain supply chains. Our direct leverage over these partners' labour practices is more limited; however, our contractual framework sets minimum expectations, and our planned third-party management platform (Section 7) will extend our visibility into this part of the supply chain.

4.3 Contractual framework

All suppliers, regardless of geography, receive the Group's Supplier Terms and Conditions upon signing the contract, which since 2023 include a dedicated ESG section. Key contractual provisions include:

- **Prohibition of forced labour:** the provider shall not tolerate, participate in, or benefit from any form of forced labour, including bonded labour, debt bondage, forced prison labour, slavery, or human trafficking. All employment is voluntary and workers are free to leave at any time or terminate their contracts.
- **Prohibition of child labour:** the provider shall not tolerate, practise, or support the use of child labour. The term "child" refers to anyone under the age of 15 (or 14 if permitted by national law), or who has not completed compulsory education, or who is below the minimum working age in the relevant country.
- **ESG standards:** non-discrimination, freedom of association, health and safety, fair wages, safe working conditions, and environmental compliance are all contractually required.
- **Audit rights:** the Group reserves the right to require information and carry out inspections to verify compliance with these standards, and may suspend or terminate the contract in the event of breach.

Although the majority of our goods and services are sourced from lower-risk regions in Europe, we apply these contractual standards universally as a precautionary and principle-based approach.

4.4 Tier 1 supplier risk assessment

2025 marks the third consecutive year in which we have conducted an in-house risk assessment of our active Tier 1 supplier base. The assessment is a self-reporting questionnaire sent to suppliers identified as operating in higher-risk countries based on internationally recognised risk indices.

Methodology

Our methodology has evolved over three years of operation:

Year	Methodology	Indices used	Scope of questionnaire
FY 2023 (1st)	Desktop country risk screening only	UNICEF Children's Rights in the Workplace Index (CRW)	Country-level risk classification of supplier base; no questionnaire sent
FY 2024 (2nd)	Self-assessment questionnaire (manual, voluntary)	UNICEF CRW Index	Child labour focus: HR policy, minimum age, workforce size, due diligence controls, incidents

Year	Methodology	Indices used	Scope of questionnaire
FY 2025 (3rd)	Self-assessment questionnaire (manual, voluntary, expanded)	UNICEF CRW Index + Global Slavery Index (dual — higher rating prevails)	Expanded to include: labour practices, modern slavery indicators, and secondary supply chain checks

The expansion of the questionnaire in 2025 to include modern slavery and labour practice indicators — alongside the adoption of the Global Slavery Index as a second screening benchmark — represents a concrete, incremental improvement in the depth and relevance of our annual assessment.

Key findings from respondents

In 2025, the questionnaire was sent to suppliers identified as operating in countries of Enhanced or Heightened risk according to our dual-index methodology, representing a targeted subset of our active Tier 1 supplier base.

Among the suppliers who responded, the following patterns were identified:

- Several enterprise-grade vendors demonstrated mature human rights frameworks — comprehensive Human Rights Policies, third-party whistleblowing hotlines, annual training programmes, and routine audits. These suppliers were assessed as low risk.
- A portion of respondents, particularly smaller and digital-first technology vendors, lacked formalised human rights policies or anonymous whistleblowing procedures. This is the most prevalent risk pattern identified and was assessed as medium risk. It does not indicate the presence of child labour or forced labour, but it does indicate that these suppliers lack the governance infrastructure to reliably prevent or detect violations.
- No respondent reported actual child labour or forced labour incidents.

Effectiveness of our risk assessment approach

While we acknowledge that a voluntary, manual questionnaire cannot provide full visibility across our supplier base, we see this assessment as a valuable first step in understanding the human rights landscape within our Tier 1 supplier population. The findings provide a meaningful initial overview and help us identify where attention and further engagement are most needed. We recognise there is room to make this process more effective and are actively working to do so.

4.5 New supplier onboarding

All new suppliers undergo the Group's standard procurement onboarding process, overseen by the centralised procurement office in collaboration with the relevant business owner and the Legal and Data Protection teams. Suppliers are assessed across compliance, country, credit, reputational, and IT risk dimensions. Human rights obligations — including prohibitions on child

labour and forced labour — are embedded in the standard terms and conditions shared with all new suppliers upon signing the contract.

4.6 Supervisory body

The Supervisory Body (the "SB"), established effective 1 January 2025 and operational throughout the reporting year, is a collegiate body appointed by, and reporting directly to, the Board of Directors of lastminute.com N.V. It comprises one member holding an operational and managerial role within the Group and one independent Non-Executive Director, combining internal operational knowledge with independent oversight.

Endowed with autonomous powers of initiative and control, the SB safeguards the integrity and lawfulness of the Group's conduct. It oversees the Group's internal control and compliance framework and the measures adopted to prevent unlawful conduct — including conduct that may affect human rights — verifying their adequacy and roll-out across the Group and reporting its findings to the Board of Directors at least semi-annually.

Among the human-rights-related offences falling within the SB's oversight, and particularly relevant to an online travel business, are: trafficking in human beings; the reduction to, or maintenance in, slavery or servitude; forced or compulsory labour; the illegal employment and labour exploitation of workers within the supply chain; child labour; and the sexual exploitation of minors, including in connection with travel and tourism. The SB's oversight in these areas underpins the Group's commitment to combating child labour and modern slavery set out in this statement.

5. Measures to Prevent, Mitigate, and Remedy Risks

5.1 Training and awareness

Ensuring that employees understand their role in identifying and preventing human rights violations — including modern slavery, human trafficking, forced labour, and child labour — is a core element of our due diligence system.

Since 2017, all employees have been required to complete a mandatory annual e-learning module on modern slavery. This established a shared baseline of knowledge across the organisation. In 2025, this module was replaced by a fully redesigned, comprehensive Human Rights e-learning programme. The new programme retains and deepens the modern slavery knowledge base while situating it within the broader framework of human rights applicable to our business. It is mandatory for all employees with an annual renewal requirement.

The programme is structured around three pillars:

- **Fundamental Principles:** a comprehensive introduction to universal human rights standards — including forced labour, trafficking, and child labour — and their direct application in a corporate environment.

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- **Industry Intersection:** a focused examination of how lastminute.com operates at the intersection of the technology and travel sectors, raising awareness of sector-specific risks including modern slavery in hospitality supply chains, ethical AI, data privacy, and responsible sourcing.
 - **Reporting and Remediation:** practical guidance on recognising warning signs and using our Integrity Helpline, with clear, actionable steps to report suspicions safely and confidently.

Our Planet Heart editorial platform — launched in 2023 — extends our awareness-raising beyond the organisation, promoting responsible travel and human rights issues, including child labour in tourism, to our broader customer base.

In early 2026, an internal interactive webinar was delivered to all employees. This session provided contextualised, practical engagement with human rights risks in the specific realities of working in technology and travel, complementing the formal e-learning module and building on the theoretical foundations established through the new programme.

5.2 Grievance and reporting mechanism

A reliable and accessible mechanism for reporting concerns is a critical element of our due diligence framework. Our Integrity Helpline provides all stakeholders — employees and external parties alike — with a secure, web-based platform to report any suspected or actual human rights violations, including child labour, forced labour, modern slavery, and human trafficking.

The Integrity Helpline offers two channels:

- **Whistleblowing Channel** — available to employees and external stakeholders — designed for reporting violations of the Code of Conduct, illegal activities, severe misconduct, and any actual or potential concerns related to child labour, forced labour, or modern slavery. Reports may be made anonymously.
- **Inquiry Form** — accessible to employees only — for seeking clarification on potential Code of Conduct violations, raising ethical concerns, and requesting guidance.

Anyone who raises a concern in good faith is protected from retaliation. All reports are documented internally, with relevant information provided to the Group's Audit Committee and Risk & Finance Committee or Board of Directors, as applicable. Where a concern related to child labour or forced labour is raised, it is escalated immediately to the relevant internal teams for investigation.

During 2025, lastminute.com recorded zero reported cases of concerns related to human rights through either channel, consistent with the two preceding years.

6. Effectiveness: Monitoring and Key Performance Indicators

6.1 Monitoring approach

Monitoring of our human rights due diligence measures is conducted through the following mechanisms:

- **Annual supplier assessment:** the Tier 1 supplier questionnaire is conducted annually, with results tracked year on year to identify changes in supplier risk profiles.
- **Training completion tracking:** the Learning & Development team tracks completion rates for the internal mandatory Human Rights e-learning programme across the employee population, published annually in the Group Sustainability Report.
- **Incident monitoring:** all reports received through the Integrity Helpline are reviewed, preliminarily analysed, and classified by the Internal Audit Department. Significant or complex cases are escalated to the multi-disciplinary Integrity Helpline Committee, which is also kept regularly informed of all cases handled.

7. Our Next Steps

Our commitment to continuous improvement is central to our approach to human rights due diligence. The following actions are already underway or committed for 2026:

- **Third-party management platform:** implementation of a dedicated platform enabling comprehensive, structured risk assessments of our supplier base across human rights, environmental, legal, risk and governance dimensions. This is the most significant capability improvement in our pipeline, moving us from a manual, periodic questionnaire model to a systematic and scalable approach applicable to a much wider proportion of our supplier base.
- **Training completion:** the new Human Rights e-learning programme will continue as a mandatory annual requirement across the full employee population.

Through these measures, we aim to strengthen our due diligence framework, deepen our visibility across the supply chain, and uphold our commitment to the elimination of child labour, forced labour, modern slavery, and human trafficking in our operations and supply chain.

Approval

This report has been approved by the board of directors (the “Board”) of BravoNext SA on 30 June 2026. The Board, alongside relevant executive leadership, has reviewed and endorsed this report as a reflection of the Group’s ongoing commitment to oppose child labour within its operations and supply chain.

In compliance with the applicable regulations in Switzerland, this report will be published on the Group’s website.

Annex I — Overview of lastminute.com Group's Legal Entities

LEGAL GROUP STRUCTURE

Below you can find the Group's structure as of 31 December 2025:

