

## **Human Rights Policy Statement of TUI Deutschland GmbH for the German Supply Chain Act (GSCA)**

We, as TUI Deutschland GmbH (TUI D) and all legal entities controlled by TUI AG (jointly “TUI” or “TUI Group”), the world’s largest tourism group, are committed to respect human rights and environmental obligations within our supply chain throughout our worldwide operations. In this regard, we refer to TUI AG's published policy statement.

Since we consider the protection of human rights as a key element, TUI is signatory of the UN Global Compact’s 10 universally accepted principles in the areas of human rights, labour, environment and anti-corruption since 2014.

We employ people from all around the world. In addition to our direct employees, our diverse business encompasses an extensive supply chain, with thousands of suppliers in more than 90 countries from manufacturers of aircraft and cruise ships to hotel laundry services and tourist guides as well as other destination services used by our customers. On this account, we implement applicable laws, respect internationally recognized human rights and environmental obligations, and take care to prevent human rights violations and environmental pollution in the course of our business activities, and those of our suppliers and business partners.

In particular, we condemn all forms of child and forced labour, all forms of slavery, all practices similar to slavery and all forms of discrimination on the basis of personal characteristics, such as national or ethnic origin, social background, gender, sexual orientation, age, religion, worldview and conviction, political belief or disability. We believe that everyone should be treated with respect and dignity and are committed to constantly improve diversity and inclusion across our business. We condemn the exploitation of children and are committed to protect them.

We are also committed to comply with the respective locally applicable regulations on occupational health and safety, the payment of fair wages and the protection of employee rights to join trade unions and exercise collective rights.

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

We have also developed specific processes in our own business area and, where necessary, vis-à-vis our direct and indirect suppliers for the purpose of complying with our due diligence obligations under the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (in

German: Lieferkettensorgfaltspflichtengesetz; German Supply Chain Act, hereinafter referred to as "GSCA").

## **Governance Structure**

### **TUI D Human Rights Officer**

Within the framework of our risk management, we as TUI D identify human rights and environment-related risks and define appropriate preventive and remedial actions in order to prevent, end or minimise the extent of a violation of a human rights-related or an environment-related obligation. For this purpose, we have appointed a Human Rights Officer as official appointment. The Human Rights Officer monitors our GSCA risk management, takes overall responsibility for business processes regarding human rights and environmental due diligence, coordinates exchange with other Human Rights Officers (TUI AG and/or TUIfly GmbH) and reports regularly to TUI Deutschland Management (Source Market Board) and to the Group Executive Committee (GEC).

### **Steering Group**

TUI D's steering group conducts the various risk analyses in coordination with all specialist areas and Group functions. It is responsible for setting up and updating our risk management system, monitoring our risks, managing preventive measures and is also responsible for implementing the relevant remedial measures in relation to the GSCA. This role also includes reporting tasks as well as documentation. In this context, the steering group collects relevant information, reports on progress and incidents, prepares the annual report for the BAFA (German Federal Office of Economics and Export Control), reviews upcoming due diligence activities, regularly informs the Human Rights Officer and works closely with the "Group Sustainability - Supply Chain Due Diligence Team (SC-DD Team)". Furthermore, the Steering Group is available as a point of contact for TUI D's specialist departments for all questions relating to the GSCA. To ensure successful fulfillment of our due diligence obligations, all departments cooperate with the Steering Group in the tasks assigned to them, as described in more detail below.

**Integrity & Compliance Team:** by providing and updating the complaint procedures / mechanism and ensuring that GSCA requirements in this regard are met as well as by coordinating the receipt and handling of suspicious cases and contact the responsible department / person. This team also ensures that complaints concerning TUI D are forwarded to the steering group for review and action as soon as possible.

**Group Legal and Legal Department TUI D:** by supporting the relevant TUI businesses to ensure that "legal documents" (e.g., contract clauses) meet the latest requirements and are implemented, in cooperation with Group Purchasing, Procurement, purchasing for TUI D and other relevant departments and TUI entities and by updating on changes of obligations or further and future relevant laws.

**Group Risk:** by updating the risk methodology and conducting the risk analysis for own businesses in cooperation with SC-DD and TUI D's Steering Group, collaborating with Group Purchasing, Procurement or other relevant departments in case of changes of methodology and ensuring proper documentation of risk identification and control measures.

**Group HR / Workplace Safety and HR TUI D:** by handling risk and remedy processes for respective risks related to employees, reporting on progress and cases / remedies, developing and delivering trainings, including those that are human rights related, and developing and implementing the TUI Global Employment Statement.

**Security / Health & Safety und Occupational Health TUI D:** by handling risk and remedy processes for respective risks related to security / health and safety issues and ensuring proper documentation of risk identification and control measures.

**Purchasing, Procurement, Supplier Management and purchasing for TUI D:** by handling risk analyses, supply chain risk and remedy processes for respective TUI suppliers, reporting on progress and cases, and maintaining and updating risk methodology for supply chain, in cooperation with the steering group and the SC-DD team.

**Group Corporate and External Affairs:** by liaising with policy makers and authorities regarding upcoming legislations, e.g., the EU Corporate Sustainability Due Diligence Directive and cooperating with associations on joint positions.

**Group Communications and TUI D Communications:** by preparing communication in case of any external requests, e.g., from Non-Governmental Organisations or media in collaboration with TUI D's Steering Group and by providing updates and communicating progress internally.

**Group Audit:** by considering the human rights processes and statements within the strategic audit planning process.

## **Risk Management:**

### Risk Management System:

We have embedded GSCA-related risks affecting our relevant business processes and supply chain within our Risk Management System.

### Risk Analysis:

As part of risk management, we conduct annual and event-related risk analyses to identify human rights

and environmental risks in our own business and along our supply chain, paying particular attention to those risks that are predominantly based on our experience in TUI D business sectors.

To do so and based on relevant indices, such as the Global Slavery Index, we have developed our own internal criteria for assessing human rights and environment-related risks, both in our own businesses and along our supply chain. These criteria consider product / industry risk, workforce characteristics, impact on rights holders, ability to influence, and strength of existing preventive measures and allow us to classify the risks as low, medium, and high.

### **Our Human Rights and Environment-related Priorities**

As part of the risk analyses conducted so far, we were able to identify the following risks to human rights and environment-related concerns, which we consider to be priorities based on their nature and scope as well as their potential significance for TUI D, among other factors:

Child labour: Uniforms may be manufactured by child or forced labour; there may be child labour or slavery (e.g. children used for begging) in the communities at excursion locations; children may sell souvenirs or food in hotel facilities or on excursions; children may work as cleaning staff, in the catering sector or take on auxiliary work such as extinguishing lanterns or providing diving equipment.

Forced labour and slavery: airport reps might observe child and human trafficking on planes and airports; low-skilled, migrant and seasonal hotel staff (e.g. housekeeping, kitchen, back of house) or suppliers' staff may be at risk of poor recruitment standards or forced labour; services for travel agent offices and head offices in other countries may be carried out by people subject to trafficking, forced labour or poor recruitment practices (e.g. cleaners, catering, security, taxi firms, call centre staff); workers at commercial stops (e.g. craft factories, rug shops) may be experiencing forced labour; aircraft cleaners are mostly migrant workers and seasonal (high turnover of staff) and may be therefore at risk of trafficking and forced labour; wage payments might be withheld with the aim of forcing work performance.

Disregarding the Occupational Safety and Health Obligations applicable under the law of the place of employment and withholding an adequate living wage: drivers and car rental staff, reps and excursion staff employed through Joint Ventures or third party providers may be at risk of poor recruitment standards and poor working conditions; food supply where we source locally might include workers who have experienced human rights violations; possibly inadequate safety standards when handling electrical equipment or machinery or when working with hazardous substances; possibly absence of protective measures to prevent physical or mental exhaustion, especially due to work overload in terms of time and content, e.g., massive overtime, lack of break time or lack of training or guidance; accommodation might be in unsuitable rooms; unclear separation of working and duty times or inadequate staff scheduling may occur; insufficient noise protection or protection against other emissions during working or rest times may occur.

Prohibition of unequal treatment: Unequal pay or granting of privileges between local and foreign employees might occur; Possible Deployment of employees of individual certain nationalities in certain areas of work to the exclusion of other nationalities.

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

## **Preventive measures**

In order to prevent human rights and environmental risks along our supply chain, and based on the outcomes of the risk analyses, TUI D has, in cooperation with TUI Group, implemented various preventive measures and tools, such as policies and processes, that set out how we respect human rights and reflect our expectations towards our business partners:

### **Policies & Statements:**

**Supplier Code of Conduct:** Sets the standards of ethical conduct, values and principles we expect from suppliers. Available [here](#).

**Integrity Passport – The TUI Code of Conduct:** Commits TUI D employees to conduct business with integrity and encourages to report potential or actual violations through available channels that include a confidential whistle-blower system (TUI Speak Up Line). Available [here](#).

**Modern Slavery Act Statement:** This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps TUI Group has taken to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain. TUI has published annual statements since 2017, available [here](#).

**Global Employment Statement:** This group statement applies both to our own employees and to the contractual partners. Its focus is the fair and respectful treatment of employees at all levels and compliance with applicable law and industry standards. Available [here](#).

### **Processes:**

**Inclusion of clauses in supplier contracts:** We have incorporated environmental and social requirements into contracts for our accommodation suppliers as well as other areas of procurement.

**Use of questionnaires and assessments to evaluate suppliers:** For non-accommodation suppliers, TUI Group has developed a diverse, sustainable, and ethical Procurement Questionnaire (including human rights related questions) accessible to all procurement colleagues across TUI Group, as part of our procurement process. For accommodation suppliers, we rely on credible third-party sustainability certifications. For activity and excursion suppliers, a certified sustainability standard, in compliance with the Global Sustainable Tourism Council (GSTC), has been developed and implemented where activity providers are required to complete assessments including questions around fair wages, working hours, child protection and local employment.

**Training & Awareness:** Through our TUI People Learning platform, training programs on Child Protection, Human Rights, and the Integrity Passport are delivered. Additionally, specific trainings are provided through other channels for relevant employee groups, such as Vulnerable Children & Trafficking Training for airline crews, Child Welfare and Protection to entertainment and childcare staff, and induction trainings on the Modern Slavery Act for Purchasing and Procurement teams. A specific training campaign on the GSCA for all TUI Group employees will be rolled out.

## **Complaints Procedure**

TUI D and the whole TUI Group is committed to address any potential compliance violation of our Integrity Passport, the Supplier Code of Conduct, our internal policies and applicable laws, including human rights and environmental sustainability. We promote a culture of open communication and trust, and we encourage our employees, business partners and anyone who has knowledge or is potentially affected by potential risks or violations to speak up and raise their concerns. TUI is committed to protect anyone who raises concerns.

To facilitate the process, TUI D and the TUI Group have developed and implemented a complaints procedure through the TUI SpeakUp Line, our whistle-blower hotline. It is a confidential channel to anonymously report concerns to our Integrity & Compliance Team 365/24/7 via phone or internet/mail. The reports are handled by the Integrity & Compliance Team itself or passed on to the respective responsible department. The complaints procedure and information on the TUI SpeakUp Line is publicly accessible via our homepage [here](#). It can also be requested by email to [compliance@tui.com](mailto:compliance@tui.com) or by letter to Integrity & Compliance Team, TUI AG, Karl-Wiechert-Allee 4, 30625 Hanover, Germany.

TUI D and the TUI Group continuously review and develop the effectiveness of the complaints procedure, at least once a year and on ad-hoc basis if necessary.

## **Remedial Actions**

As soon as TUI D is made aware, through any of the above explained channels, that the violation of a human rights-related or an environmental-related obligation has already occurred or is imminent, we immediately take remedial action. Depending on if the violation is identified internally, within our own businesses, or externally, throughout our supply chain, the actions taken vary.

### **Internal – Amongst our employees:**

We raise awareness amongst our employees through target-oriented workshops and trainings. Moreover, we request our employees to comply with our values and observe our Integrity Passport. With this regard, we appeal our leaders, supervisors, and managers to perform a leadership role in accordance with their contract of employment, consistent with our Integrity Passport and to give instructions to influence the subordinate's behavior, in particular the behavior of the causer of the violation of a human rights-related or an environment-related obligation. If the measures are not sufficient to change the behavior, which is causing the violation, we take actions under labor law, such as warning the causer or terminating the causer's employment as far as permissible under labor law.

### **Internal – Own operations:**

If the violation of a human rights-related or an environmental-related obligation takes place in our own operations, our remedial measures may result in the termination of the violation in compliance with local law. For this purpose, we have defined a detailed "*Remedial actions process for our Own Business Area*", which describes how we deal with violations in our own business.

### **External – Supply Chain:**

Our remedial measures with regard to direct suppliers are based in particular on our Supplier Code of Conduct, the Modern Slavery Act Statement, our Global Employment Statement and our clauses in the supplier contracts with environmental and social requirements. We define remedial measures in cooperation with our supplier. We consider, if possible and practicable, joining forces with other enterprises in sector initiatives and sector standards to increase the ability of influencing the entity that causes or may cause a harm. If the cause of a violation is the supplier's unwillingness to cooperate, we use contractually agreed measures, i.e. the temporary suspension or, as ultima ratio, the termination of the business relationship. If TUI has actual indications of a violation of a human rights-related or an environmental obligation at indirect suppliers, we initiate the remedial process analogous to the remedial process at direct suppliers.

Consequently, we have defined a detailed "*Remedial Actions Process for Violations at Suppliers*", which describes how we deal with violations at suppliers. Both, our "*Remedial Actions Process for Our Own Business Area*" and our "*Remedial Actions Process for Violations at Suppliers*" aim for immediate handling of imminent and current violations, consider the affected person (rightsholder) and include the monitoring of the effectiveness of the procedure.

We continuously review and develop the effectiveness of our remedial measures, at least regularly once a year and on an ad-hoc basis if required.

## **Documentation and Reporting:**

We document our efforts to effectively implement our due diligence obligations on an ongoing basis. In addition, we will publish annual reports on the fulfillment of our due diligence obligations starting January 1, 2023. This will be published on our website no later than four months after the end of our fiscal year and will be available free of charge for a period of seven years.

## **Our expectations towards our employees and suppliers**

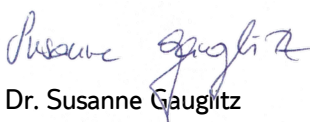
The principles outlined in this policy statement apply both, to our own business, i.e., all our employees, and to our suppliers in the supply chain. We expect all our employees and suppliers to comply with applicable laws, our corporate guidelines and with our policies and values. To this end, we have developed together in the TUI Group our Integrity Passport, the Code of Conduct for our employees, our Global Employment Statement, which sets out our expectations towards our employees in a clear and understandable way. Our Integrity Passport is an integral part of their employment contract and is binding for all our employees. In addition, we expect our suppliers and business partners to also commit to adhering to our values and to develop and embed appropriate and effective processes to both address and prevent the risks and violations we have discovered and to detect other potential risks. We expect our suppliers and business partners to pass on and ensure our requirements along their own value chain.

In order to transparently communicate our expectations to our suppliers and business partners, we have developed our Supplier Code of Conduct, which is part of all supplier contracts as well as contract clauses with environmental and social requirements. This policy statement of TUI D was adopted by the Management Board on April 13, 2023.



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