How to raise a concern?
Complaints Procedure at TUI

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1 Integrity and Compliance at TUI

At TUI, we are committed to respecting the laws and acting with integrity. Integrity to us means doing the right thing even if no one is watching. That we do what we say.

The Integrity Passport, our TUI Code of Conduct, applies to everyone at TUI from trainee to Board Member. It sets out our general ways of working. It gives guidance on how to deal with the most important integrity and legal topics in our daily work – with our colleagues, our customers, our business partners and other third parties.

We work for a company with an excellent reputation, and we want to be not only proud of our achievements, but also of how we achieve success. When taking decisions in our daily work, we strive to protect the excellent reputation and brand value of TUI which has been built up over decades.

Our supply chain covers thousands of suppliers in more than 90 countries, including manufacturers of aircraft and cruise ships, laundry and other services provided to our hotels, tourist guides and other services our customers use in destination.

We believe that a shared commitment to conducting business with integrity ensures sustainable, long-lasting relationships where all parties benefit. We ask our business partners and suppliers to comply with the principles set out in our Supplier Code of Conduct and to implement them throughout their own supply chain.

2 Raising a concern

TUI 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. 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.

The following describes how to raise a concern about an actual or potential compliance violation without fear of retaliation and how such reports are handled within TUI.

2.1 Which concerns can be reported?

We encourage everyone to report any concerns about actual or potential violation of our Integrity Passport, our Supplier Code of Conduct, our internal policies and applicable laws, including human rights and environmental sustainability (further referred to as 'Compliance Violations'). This should be made in good faith, i.e. there should be at least a reasonable ground to believe the reported circumstances are true. Reported concerns can relate to:

- Integrity Passport and TUI internal policies, e.g. violations against fair competition, anti-bribery and anti-corruption. Examples: offering money to the decision-maker of a possible client to be awarded a contract; or ccollusion with another company offering the same service to achieve a certain price.
- Human rights and environmental risks or violations in the supply chain, e.g. disregard of occupational health and safety, working time, freedom of association, child labour, forced labour. Examples: hotel staff working excessive working hours, workers at suppliers are not adequately protected from accidents at work.
- Other violations of federal and federal states legislation and directly applicable legal acts of the European Union and the European Atomic Energy Community.

- National criminal law offences.
- Certain administrative offences regardless of EU origin if aimed to protect life, limb, health or rights of employees or their representatives.

2.2 Who can report a concern?

TUI encourages everyone who has the knowledge or suspicion about an actual or a potential Compliance Violation caused by the economic activities of TUI or by a supplier of TUI to use the available channels to report concerns.

2.3 When to report a concern?

In case of a suspicion or knowledge about an actual or potential Compliance Violation, it should be reported promptly using the available channels. We want to avoid potential harm and address any concerns quickly and effectively.

3 How to report a concern?

The channels described below are open to everyone who wishes to report a concern about an actual or a potential Compliance Violation caused by the economic activities of TUI in its own business area or by a supplier of TUI.

3.1 Reporting channels for TUI Group Employees

If you are a TUI employee first, try addressing the matter with the person whose conduct is concerning you. If you think that this is not adequate, you should talk to your line manager, HR or Legal contact or the Integrity & Compliance Team via compliance@tui.com. However, when reporting through those channels is not possible or does not feel right or where you believe that a serious violation may be taking place, we encourage you to share your concerns via the TUI Speak Up Line (either via the confidential telephone or website).

More information can be found on GROUP smile and local intranet pages or requested via compliance@tui.com.

3.2 Reporting channels open to everyone

If you are not a TUI employee (e.g. customer, supplier, worker at a supplier, former employee, local resident or other), please reach out to your TUI contact person to report your concern.

Information can be found on the TUI Suppliers website or the Partners website.

However, if for whatever reason this is not possible or does not feel right or where you believe that a serious violation may be taking place, we encourage you to share your concerns via the TUI Speak Up Line (either via the confidential telephone or website).

3.3 External reporting channels

All persons wishing to report a concern also have the option of submitting an external report to the responsible federal, state or European Union bodies, institutions or other agencies. In particular, the following external reporting channels come into consideration

Germany:

- Central external reporting office of the Federal Office of Justice (Bundesamt für Justiz)
- Whistle-blower system of the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht)
- The Whistle-blower system of the Federal Cartel Office (Bundeskartellamt).

Netherlands: Het Huis voor Klokkenluiders

Belgium: Federal Ombudsman

France: Défenseur des droits'

Information on reporting channels in other countries can be requested via compliance@tui.com.

4 What is the TUI Speak Up Line and how to use it?

TUI is committed to protect anyone who raises concerns. The TUI Speak Up Line, our whistle-blower hotline, is a confidential channel to anonymously report concerns to our Integrity & Compliance Team 365/24/7 via phone or internet. The reports are handled by the Integrity & Compliance Team itself or passed on to the respective responsible department. The system is provided and operated by Navex, an external provider.

4.1 How to reach the TUI Speak Up Line?

The TUI Speak Up Line offers three ways to make a report:

1. **A secured website** https://tuispeakup.ethicspoint.com/

2. **QR code to report a concern via mobile**

3. **A telephone line** answered by trained personnel of a third party provider, which guides through the call. The list of phone numbers, including free-of-charge numbers where possible, can be also found on the secured website link.

The TUI Speak Up Line is free of charge (except for local telephone fees).

4.2 What information to provide?

If you suspect or know about an actual or potential Compliance Violation, please raise the issue as soon as possible providing information you consider as relevant supported by evidence, if available. The secured website allows for the uploading of supporting documentation.

The report should contain as much information as possible to provide a full picture of the observed violation, especially details about:

- **WHAT HAPPENED** (the nature of the issue, rules or laws affected)
- **WHEN** (the issue occurred or is about to occur; for how long it has lasted; when did it stop
- **WHO** (has been involved or is aware of the issue and could provide more details)
- **WHERE** (in which country or at which supplier did the issue occur).

Since the reports can be done in a great variety of languages, the Integrity & Compliance Team will translate to facilitate the communication and prompt handling.

4.3 Further communication via TUI Speak Up Line

When making the report via phone, QR code or the secured website, the messenger will be provided with a unique case number. With this case number, the messenger will be able to log in to our Speak Up Line and further communicate with the Integrity & Compliance Team and stay in touch.

4.4 Tips for using the TUI Speak Up Line

Here are some tips for using the TUI Speak Up Line:

- If you do not feel comfortable about making a call, ask someone else whom you trust call the Speak Up telephone system on your behalf, or leave a web message.
- The system can be accessed from home or any other location if you are concerned about being overhead or observed leaving a message at work.
- Leave your message at a time of your own choosing. The system is available 365/24/7 from any telephone or computer.
- When you leave your message, make sure you have made up your mind as to whether or not you wish to remain anonymous.
- When you leave your message, make sure you have thought about the amount and type of information you want to include in your message. However, you have the possibility to add information at a later stage.
- To speed up the process of a possible investigation, give as much information as possible to strengthen your message, i.e. names, location, invoice number etc., spelling out any difficult words.
- If you have proof of your case in electronic form, please use the "upload document" facility on the SpeakUp web system. You can also use this web facility when leaving a message by telephone; you simply need to input the case number you received.
- It is important to note down and remember the unique case number that was provided via the system when making the report. This will allow you to log in via web or via phone and receive the confirmation of the report and other feedback (next steps, additional questions) provided by the Integrity & Compliance Team.

- Please check regularly whether a response has been left for you. If you left a message via the telephone system, you can either do that via the web system or the telephone system. Otherwise, please use the web system to check for the response.

4.5 Anonymous reports

The TUI SpeakUp Line allows anonymous reporting. The reports are handled with great care and are available to a small number of individuals from the Integrity & Compliance Team. We encourage messengers to identify themselves (by sharing their name, position, and contact details) when making a report to allow a more efficient communication and better handling of the report. Nevertheless, if anyone doesn't feel comfortable about disclosing the identity, the report can be done anonymously.

The reports left via phone or online are initially received by Navex and shared in text form with our Integrity & Compliance Team for further evaluation. Since the reports can be done in a great variety of languages, we translate to facilitate the communication and prompt handling. The original audio message and/or IP identification of the messenger is not accessible by TUI.

4.6 Protection of the identity of the messenger

If the identity and/or other non-public information was shared by the person who made the report, it will be treated confidentially and in accordance with the applicable data protection laws. The TUI Speak Up Line is operated in a secure manner to ensure the confidentiality of the identity of the reporting person and other related information, in particular any information on person(s) named in a report.

Such information will only be shared on a need-to-know basis, within authorised persons within TUI empowered to handle the report, or with external advisors and counsel, who are also committed to handle the information confidentially.

In particular cases, TUI may also need to share the information relating to the report with competent authorities. When legally allowed and feasible in the circumstances, the messenger will be informed about such intention.

5 How are Speak Up reports handled within TUI

5.1 Incoming reports

Reports made via TUI Speak Up Line are received and handled by the Integrity & Compliance Team with the required care and professionalism. Once a report is made through the TUI Speak Up Line, the team will receive the report (translated if needed) within approx. 24 hours. The Integrity & Compliance Team will make an initial assessment of the report that includes a plausibility check and the decision on next steps. The initial assessment might result in either starting an internal investigation of the reported concern or closing the report if there is no justification for further investigation, e.g. no indication for violation or misconduct.

Depending on the nature of the issue the report might be investigated not directly by the Integrity & Compliance Team and the communication with the messenger handed over to the respective responsible department e.g. Group Audit, Group Sustainability, Group Health & Safety per internal procedures and risk ownership. Persons entrusted with the conduct of proceedings are ensured to be impartial, be independent and not bound by instructions and sworn to confidentiality.

5.2 Feedback on report status and outcome

Confirmation of receipt of the report as well as the first answer with regards to the initial assessment of the report based on the information shared, along with a summary of the matter raised and next steps will be provided to the messenger within 7 (seven) working days after the concern was raised via Speak Up. If necessary (e.g., for investigation purposes) and possible (e.g., if a report was not made anonymously), the Integrity and Compliance Team may contact the messenger to discuss the facts.

Using the unique case number obtained when making the report, the messenger will be able to log in via web or via phone to obtain the receipt confirmation of the report and stay in touch with the Integrity & Compliance Team.

Should the initial assessment result in the start of an investigation, the Integrity & Compliance Team will monitor the progress of handling the report in accordance with the internal procedures and will provide the messenger with feedback, to the extent allowed by law, if sharing such feedback does not jeopardise the inquiry of the report, personal rights of individuals involved or others.

Should the initial assessment result in the closure of the report with no further investigation, the messenger will be informed about the reason and have the possibility to take position on the decision within 30 (thirty) working days before the report will be closed in Speak Up. The messenger can nevertheless submit a new report via the TUI Speak Up Line or raise the matter, especially if new circumstances came to light. If the messenger is not satisfied with the outcome of the decision, the concern may be readdressed with TUI and a further review or consideration requested. There may be circumstances during the initial review or investigation of the report where clarification on certain aspects or request for additional documentation from the messenger might be needed. In such circumstances the purpose of seeking clarification or additional documentation will be given and the messenger will be provided with feedback on the status of the report at that time.

Upon closure of the investigation by TUI, the messenger will be informed, to the extent possible, about the findings and about the remedies or follow-up actions resulting from the findings within 3 (three) months after the initial response. If the messenger is not satisfied with the outcome of the investigation, the concern may be readdressed with TUI and a further review or consideration initiated. Following the final response, the report will be closed in Speak Up Line after 30 working days if no follow-up communication was received from the messenger. For clarification purposes: the implementation of preventive and/or remedial measures will not be affected by this. The messenger can nevertheless submit a new report via the TUI Speak Up Line.

6 Protection against adverse consequences

If a person reports a potential violation in good faith, TUI will keep this confidential and protect the identity of the messenger. Whether or not this turns out to be valid, the person will not be subject to retaliatory or disciplinary action or to any other adverse consequences.

TUI will not tolerate any form of retaliation, including the threat of retaliation against reporting persons who made their reports in good faith. Furthermore, TUI does not tolerate any form of retaliation against:

- Any third person connected with the reporting person, e.g. colleagues and relatives, who could suffer retaliation in a work-related context,
- Anyone who assisted a reporting person in the reporting process.

For this purpose TUI has established internal rules to ensure protection of reporting persons and the associated persons stated above. In particular, protected persons shall not be considered to have breached any restriction on disclosure of information, and they shall not incur any liability in this regard, as far as the legal influence of TUI reaches. This is under the condition that they had at least reasonable grounds to believe that the reporting or public disclosure of such information was necessary for making the report.

Our prohibition against adverse consequences covers any direct or indirect act or omission within TUI's reach of legal influence, which can harm a reporting person as a result of reporting a concern, e.g.:

- Suspension, lay-off, dismissal or equivalent measures
- Demotion or withholding of promotion
- Transfer of duties, change of location of place of work, reduction in wages, change in working hours
- A negative performance assessment or employment reference
- Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty
- Coercion, intimidation, harassment or ostracism
- Discrimination, disadvantageous or unfair treatment
- Failure to renew, or early termination of, a temporary employment contract
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income
- Early termination or cancellation of a contract for goods or services
- Cancellation of a licence or permit.

7 Data protection and record keeping

TUI is committed to complying with applicable data protection and privacy legislation. TUI documents every report received. These records will be kept confidentially. The records will be stored no longer than necessary and proportionate in order to comply with any legal requirements.

8 Questions

Questions on raising concerns with TUI can be sent to the Integrity & Compliance Team via compliance@tui.com.

We are there to help!