

Corporate Social Responsibility Policy

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eDreams ODIGEO is one of world's largest online travel companies and one of the largest European e-commerce businesses, recognised for its quality, independence and integrity. The Company has established a strong brand and reputation based on its pioneering spirit, empathy with the client, focus on service, and constant commitment to innovation through cutting edge technologies.

As a global Group, the Company strongly believes in 'Corporate Social Responsibility delivered in a context in which the business operations positively impact the environment and the local communities where it operates.

The Corporate Social Responsibility ('CSR') policy is designed to promote a culture of social responsibility across the Group.

All current and future initiatives developed under the Corporate Social Responsibility umbrella will aim to generate long-term value to the Company, its customers, its stakeholders and to the wider society in which it operates.

1. Objectives of the Corporate Social Responsibility Policy

The main objectives of this policy are specified as follows:

- a) To carry out its activity in a responsible manner and respecting laws and regulations.
- b) Enhance the competitiveness of the Group through management practices based on productivity, innovation, profitability and sustainability whilst respecting the environment and providing a social value.
- c) Foster a culture of ethical behaviour, trust and integrity.
- d) Contribute to the enhancement of the reputation and external recognition of the Group.

2. General Principles

This CSR policy is aligned with the eDreams ODIGEO Business Code of Conduct, in which behavioural patterns are consistent with eDreams ODIGEO values.

The Principles Governing the CSR policy are:

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- a) **Compliance** with applicable law in the countries and territories in which it does business, basing its relations with the competent public authorities in each jurisdiction on fidelity, reliability, professionalism, collaboration, reciprocity, and good faith.
- b) **Integrity and a culture of ethical behaviour** in the areas of human rights, equal opportunities, labour practices, and the environment.
- c) **Transparency and reliability in presentation of information and communication** with shareholders, investors, employees, customers, suppliers, and, other Stakeholders
- d) **Commitment** with the respect of the environment and its sustainability; adding a social value to our activity

3. Responsible Commitments and practices

3.1. Employees

- Respect international human and labour rights opposing, in particular, child labour, slavery, etc.
- Recruit, select, and retain talent within a favourable employment relationship framework, based on equal opportunities and non-discrimination based on gender, age, disability or any other circumstance.
- Facilitate measures for the integration of disadvantaged groups.
- Facilitate a healthy personal and working life balance.
- Establish policies and procedures that favour the hiring of the best professionals and strengthening of the Group's human capital.
- Ensure the implementation of practices to guarantee a safe and healthy working environment for all employees.
- Promote development of the workforce, offering a diverse range of training, coaching and mentoring.
- Adapting the human resources function to a diverse and multicultural work environment.
- Facilitate the channels and instruments necessary for reporting, confidentially, the commission of irregular actions, of illegal acts and other acts contrary to their principles of ethics and conduct.

3.2. Customers

- To place our customers at the centre of our activity in order to establish lasting relationships based on mutual trust and the contribution of value. Our customer-centric approach is applied to everything we do, and everything we create.
- To encourage transparent and responsible communication and marketing activities.
- To develop products and services with high social impact adapted to the context in which our customers live.
- Facilitate effective access to information regarding the services provided by the Group for customers by providing our services in a variety of languages.

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- Adopt the necessary procedures to ensure the confidentiality of customer data.

3.3. Suppliers

- Comply with the *Group Procurement Policy* that sets out guidelines for providing complete and transparent information on procurement processes, respect for human and labour rights in the supply chain, and the engagement with socially-responsible suppliers.

3.4. Shareholders and investors

- Transparency, veracity, immediacy and consistency in disseminating information.
- To facilitate knowledge of matters that may be necessary to allow shareholders to properly exercise their rights.
- To post information continuously, periodically, timely and available over time.
- Ensure all shareholders and investors are treated in an equitable way
- The Board of Directors of the Company has approved a *Policy regarding Communication and Contacts with Shareholders, Institutional Investors, and Proxy Advisors* that develops the relations with analysts, institutional investors, and proxy advisors, and recognises ongoing attention to the transparency of information for shareholders and the markets generally as a strategic goal.

3.5. Society and the environment

- Carry out corporate voluntary programs, promoting the participation of Group employees in solidarity initiatives in alignment with the Mission and Vision of the eDreams ODIGEO Group.
- Promote the *Green Environmental Statement* that includes, environmental risk management, the progressive integration of environmental variables in product development, and the promotion of eco-efficiency.

3.6. Market Orientation and Innovation

- To continually push boundaries to become a more lean and agile company than ever before where everyone has the opportunity to make a huge impact, both on the business and on the travel industry as a whole.
- Foster a working environment encouraging innovation as well as providing resources to facilitate this, using a huge wealth of data and consumer insight to develop products that directly benefit our customers.
- Integrate specific innovation programs across business units, stimulating and organising initiatives to promote innovative thinking amongst employees.

3.7. Fiscal responsibility

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- To properly fulfil tax obligations and avoid any fraudulent practices. For this purpose, the Group has a Fiscal Strategy that is consistent with the principles of integrity, transparency and prudence.

3.8. Corporate Governance and Business Ethics

- To promote compliance with legal obligations and avoid conduct that is contrary to Group Code of Conduct and other policies that could damage the equity, image or reputation of eDreams ODIGEO.

4. Approval and Monitoring Bodies

The Board of Directors of eDreams ODIGEO (the "Company") is responsible for approving the policy and monitoring compliance.

The CSR Committee, a permanent internal body, will present an annual statement to the Board of Directors detailing the degree of progress in compliance with the CSR policy.

The *Corporate Social Responsibility Policy* and the Annual Statements are available on the corporate website and applies to all companies within the Group.

This *General Corporate Social Responsibility Policy* was approved by the Board of Directors on June 2017.