



Report on the GSCA

(German Supply Chain Act)

TUI AG

Reporting period from 01.01.2023 to 30.09.2023

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NOTE: THE ENGLISH TRANSLATION IS FOR INFORMATION PURPOSES ONLY. IN THE EVENT OF DIFFERENCES, THE GERMAN VERSION SHALL PREVAIL.

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A. Strategy & anchoring

A1. Monitoring risk management & the responsibility of the management

What responsibilities for monitoring risk management were defined during the reporting period?

Thomas Ellerbeck, Member of the Group Executive Committee, Group Director Corporate & External Affairs, Chief Sustainability Officer and Human Rights Officer

Kathrin Möllers, Group Director Sustainability & ESG

Dr. Dietmar Deffert, Group Director Integrity & Compliance

Note for the German report: We predominantly use the generic masculine in our report so that it is easier to read.

A. Strategy & anchoring

A1. Monitoring risk management & the responsibility of the management

Has the management established a reporting process that ensures that it is regularly informed - at least once a year - about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process that ensures that it is regularly informed - at least once a year - about the work of the person responsible for monitoring risk management in accordance with Section 4 (3) GSCA.

- Confirmed

Describe the process that ensures reporting to management on risk management at least once a year or on a regular basis.

The TUI Group comprises TUI AG and all managed Group companies. For the purposes of this report, managed Group companies are all German and foreign companies in which TUI AG directly or indirectly holds a majority stake, as well as all other shareholdings where the management of the company lies directly or indirectly with TUI AG.

The Executive Board is the TUI Group's management body representing the company externally and managing the business internally. The extended Executive Board, the Group Executive Committee (GEC), is the TUI Group's management body. It consists of the members of the Executive Board and the heads of the core business segments and central functions. The GEC meets regularly to receive reports on the areas that are important to the company. As it is such an important topic, the report on protected human rights and environmental issues, together with the risk analysis and corresponding risk management, is part of the GEC's reporting agenda at least once a year. Reporting is carried out by TUI AG's Human Rights Officer. Employees in the Group Sustainability department work continuously on topics and issues derived from the GSCA and report to the Human Rights Officer. This includes monitoring and, in coordination with other Group functions, carrying out the various risk analyses and setting up and updating the risk management system. At the same time, an overview of risks and corresponding remedial measures in relation to the GSCA is maintained.

The Group Risk Oversight Committee is another risk management function established within the Group. It was set up by the TUI Executive Board. The Committee is chaired by TUI AG's Chief Financial Officer. During these Committee meetings, the primary Group risks, including those arising from the GSCA, are analysed.

The Group Risk Oversight Committee reports regularly to the TUI Group's Executive Board, but at least once a year.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Is there a policy statement that has been prepared or updated based on the risk analysis carried out during the reporting period?

The policy statement has been uploaded

The declaration can be downloaded from this page:

<https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei>

Direct PDF download link:

https://www.tuigroup.com/damfiles/default/tuigroup-15/de/nachhaltigkeit/human-rights-and-modern-slavery/TUI-AG-Erkl-auml-rung-zu-Menschenrechten_final.pdf-7ded9ec62403f3ef168728fb73afbbcc.pdf

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Has the policy statement for the reporting period been communicated?

It is confirmed that the policy statement has been communicated to employees, the Works Council, if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.

- Confirmed

Please describe how the policy statement was communicated to the relevant target groups.

Relevant target groups for the communication of the policy statement are at least the employees and governing bodies of the TUI Group, the Works Council, the shareholders, suppliers and partners, as well as the general public.

In December 2022, the responsible TUI Group Executive Board provided employees with comprehensive information on the GSCA via a Group-wide communication in German and English. In September 2023, the TUI Group Executive Board sent a further communication to all employees by email, specifically explaining the "TUI Declaration of Principles on Human Rights". In April 2023, TUI Deutschland GmbH held a digital information event to explain the principles of the GSCA. Other German-speaking Group companies were also able to take part in this event.

The "TUI Declaration of Principles on Human Rights" is publicly available on the TUI Group website under the heading "Human Rights and Modern Slavery" (<https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei>).

The Policy Statement was made available and explained to the Compliance Committee of TUI AG's Group Works Council.

Explanations of the Policy Statement are also available to all TUI Group employees on the company intranet.

Suppliers of the Central Purchasing department in Germany receive a direct link via the standardised order confirmations (so-called "purchase orders") to the section of the TUI homepage in which the "TUI Declaration of Principles on Human Rights" is published. . In addition, all TUI partners, i.e. all direct and indirect suppliers or other stakeholders, will also find an explanation and direct link to the Policy Statement on the TUI partner homepage: www.tuipartners.com (<https://www.tuipartners.com/sustainability/sustainability-policies-practices/human-rights/>).

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

What elements are included in the policy statement?

- Establishment of a risk management
- Annual risk analysis
- Establishment of preventive measures in own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Remedial measures in own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Provision of a complaint procedure in own business area, with suppliers and their effectiveness review
- Documentation and reporting obligations
- Description of identified prioritized risks
- Description of human rights and environment related expectations of own employees and suppliers

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Description of possible updates during the reporting period and the reasons for them.

As this is the first report submitted, the question is not applicable.

A. Strategy & anchoring

A3. Securing the human rights strategy within the own organisation

During the reporting period, which departments/business processes were responsible for the implementation of the human rights strategy?

- HR
- Environmental management
- Workplace Safety, Health & Safety
- Communications / Corporate and External Affairs
- Procurement / Purchasing
- Supplier Management
- CSR / Sustainability
- Legal / Compliance
- Mergers & Acquisition
- IT / Digital Infrastructure
- Community / Stakeholder Engagement
- Audit

Describe how responsibility for implementing the strategy is distributed within the various departments/business processes.

The Executive Board of TUI AG has appointed a Human Rights Officer. He monitors whether an appropriate and effective risk management system has been put in place to comply with due diligence obligations within the company. He is responsible for ensuring the strategy for implementing risk management in all relevant business processes through appropriate measures and regularly reports on this to the GEC.

In the Group Sustainability department, the responsible employees coordinate the resulting tasks with the various departments and report to the Human Rights Officer. In consultation with other Group functions, they coordinate the implementation of the various appropriate risk analyses, the establishment of the risk management system and monitor the timeliness of risks and the implementation of appropriate remedial measures. Reporting obligations also fall within this area. In this context, relevant information is collected across the Group, progress and incidents are reported, the annual report is prepared and future legislation on environmental, social and corporate governance responsibilities are reviewed. The team continually reports to the Human Rights Officer.

In order to comply with the due diligence obligations under the GSCA, the following departments liaise with their colleagues in Group Sustainability on the tasks assigned to them:

Group Integrity & Compliance: The team is responsible for setting up an appropriate complaints procedure at Group level and ensuring that the relevant requirements are met. It is responsible for coordinating the receipt and processing of suspected cases and for contacting and liaising with the relevant departments/ entrusted individuals.

Group Legal: The team supports the relevant TUI companies in cooperation with Group Purchasing and Group Procurement, other relevant departments and TUI companies. Its role is to ensure that legal

documents (for example contractual clauses) comply with legal requirements and are implemented in an appropriate manner.

Group Risk Management: In collaboration with the Group Sustainability team and in conjunction with Group Purchasing and Group Procurement as well as other relevant departments, the team is responsible for implementing an appropriate risk analysis within its own business area as part of risk management. In the event of changes to the risk analysis methodology, it ensures that risk identification and control measures are properly documented.

Human Resources: This area is responsible for managing appropriate risk and remediation processes related to human rights compliance for employees in its own business area. It is also responsible for reporting on progress and cases/remedial actions, developing and delivering training, and developing and implementing the TUI Global Employment Statement.

Occupational Health and Safety: The team is responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures in relation to health and safety issues as well as ensuring that risk identification and control measures are properly documented.

Purchasing and Procurement: These teams are responsible for carrying out risk analysis processes and the resulting implementation of appropriate measures with direct suppliers, reporting on progress and cases as well as maintaining and updating the risk analysis methodology for the supply chain in collaboration with the Group Sustainability team.

Group Corporate & External Affairs: This team establishes and maintains contact with political decision-makers and authorities in relation to upcoming legislation and ensures close and transparent collaboration with associations in the development of shared positions.

Communications: The communications team is responsible for preparing internal and external communications relevant to the Group in the event of public enquiries, for example from non-governmental organisations or the media, in collaboration with the Group Sustainability team, as well as providing updates and handling internal communications regarding progress.

Group Internal Audit: Group Internal Audit reviews implemented GSCA processes to ensure compliance with controls as well as their appropriateness and effectiveness.

Describe how the strategy is integrated into operational processes and procedures.

For TUI AG and all managed Group companies, it was decided to include an additional contractual clause and the Supplier Code of Conduct, which has been adapted to the requirements of the GSCA, in contracts in accordance with a risk-based approach. This ensures that suppliers and business partners are aware of and comply with the human rights and environmental obligations arising from the GSCA as well as TUI Group's expectations of suppliers.

In areas where employees have direct, personal contact with suppliers, targeted training courses were organised, i.e. tailored to the requirements of the respective business areas. This enabled employees in direct contact with suppliers to point out the relevant requirements of the GSCA and explain the clause. In Central Purchasing in Germany, a direct link to the "TUI Declaration of Principles on Human Rights" was added to the standardised order confirmation document, in addition to the adapted Code of Conduct, so that this could be communicated to suppliers, even if there was no direct contact person available.

Describe the resources and expertise provided for implementation.

Since the end of 2022, around fifteen to twenty employees from the relevant areas mentioned above have been working on the legal obligations arising from the GSCA and their appropriate implementation within the Group as part of a Group-wide project group.

In addition, a renowned consultancy firm was commissioned to support TUI in implementing the measures required by the GSCA, such as preparing the risk analysis methodology.

Furthermore, there is intensive cooperation within the TUI Group with regard to internal legal advice between Sustainability, Integrity & Compliance, Legal and employment law specialists.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritise human rights and environmental risks?

- Yes, for own business area
- Yes, for direct suppliers

Describe the period in which the annual risk analysis was carried out.

Due to the diversity, size and scope of the TUI Group's business operations, the risk analyses were carried out at different times during the period under review, depending on the business and purchasing areas.

Describe the risk analysis procedure.

As part of risk management, an appropriate risk analysis is carried out once a year to identify human rights and environmental risks in the company's own business and within the supply chain. Ad hoc risk analyses are initiated if the risk situation significantly changes or significantly increases within the supply chain. As part of the risk analysis, those risks that are already known from many years of experience in day-to-day business were specifically analysed. The identification of risks was based on indices such as the Global Slavery Index and our own internally developed criteria for assessing human rights and environmental risks, both in our own business and within the supply chains. This criteria takes into account product and industry risks, country risks, types of employment, impact on rights holders, opportunities to influence and the effectiveness of existing preventive measures. The risks were categorised as "low", "medium" or "high".

The risk analyses were carried out by the Group Risk Management team for the company's own business and by the Purchasing, Procurement and Supplier Management teams for the supply chains.

Detailed procedure in own business: Managed Group companies that employ their own staff, regardless of whether they are permanent or temporary or domestic or foreign, were selected for the gross risk analysis. Based on the results of the gross risk analysis, taking into account the country risk, industry risk and volume risk (measured by the number of employees as of the reporting date), the companies were prioritised according to the risk identified. The companies that were categorised as "relevant" following the gross risk analysis were sent a web-based questionnaire on which to answer detailed questions relating to their exposure to the risks specified, particularly with regard to their impact and probability of occurrence. The results from these questionnaires were further analysed for each risk and each company in order to carry out a risk assessment. A matrix is derived from this evaluation that can be used to understand the exposure to "high", "medium" and "low" risks and appropriate measures for risk minimisation and risk prevention can be developed.

Detailed approach in the supply chain: Due to the different purchasing processes existing in each of the individual business areas, four different risk analyses were carried out based on the same two-step risk analysis methodology; through an abstract analysis and a risk questionnaire. The responsible areas are Group Procurement, Accommodation Purchasing, and the TUI Airline and TUI Musement segments. In addition, TUI Deutschland GmbH, a subsidiary of TUI AG, has also carried out an appropriate risk analysis. This is described in more detail in the separately published report by TUI Deutschland GmbH.

In all four areas, an abstract risk assessment of the product or service to be procured was initially carried out, using the internally defined criteria - industry risk, country risk and total volume/turnover. The result of this assessment determined the applicability of the risk questionnaire. Suppliers for which a risk exposure between "medium" and "high" was identified in the initial assessment were asked to complete the risk questionnaire.

Within the TUI Airline and TUI Musement segments, the risk questionnaire was also sent to all suppliers rated lower than "medium" if they had refused to agree to the inclusion of the revised Supplier Code of Conduct within their individual contracts.

Within Group Procurement, a questionnaire on compliance with human rights was also included in the tendering platform and all suppliers participating in tenders had to answer this as part of the tendering process. The answers were analysed by the Procurement team and the relevant experts, and the results of the evaluation were incorporated into the overall assessment and the final contract award.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were event-driven risk analyses also carried out during the reporting period?

- Yes, due to substantiated knowledge of possible violations at indirect suppliers
- Yes, due to other events: In the reporting period, analyses were carried out on specific occasions. This was done whenever TUI became aware of possible violations at indirect suppliers.

Describe the specific occasions.

In the past financial year, a report broadcast by Südwestrundfunk in June 2023 entitled "Report Mainz: Trotz Lieferkettengesetz: Prekäre Arbeit im Tourismus" (Report Mainz: Precarious work in tourism despite the Supply Chain Act), including prior research and enquiries by the media authority, gave rise to ad hoc analyses of direct suppliers. The content of the report was about potential violations of local employment law in hotels in Tenerife, Santorini and Crete, which had been reported anonymously by staff.

Describe what findings the analysis has led to with regard to a materially changed and/or increased risk situation.

The potentially affected hoteliers were contacted directly with a request to answer questions about the facts of the case. At the same time, the hoteliers were sent a questionnaire on the hotel's general risk assessment and the duties of care arising from the GSCA.

In general, further clarification of the facts did not reveal any violation of local employment law regulations and therefore no significant change or significant increase to the risk situation.

Describe the extent to which findings from the processing of reports/complaints have been incorporated.

As this is the first reporting year, no findings from the processing of reports/complaints have been included.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) in your own business area?

- Disregard for occupational health and safety and work-related health hazards

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for direct suppliers?

- Prohibition of hiring or using private/public security personnel who may cause disruption due to lack of training or control
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association and the right to collective bargaining
- Prohibition of forced labour and all forms of slavery
- Prohibition of withholding an appropriate wage

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified as part of the risk analysis(es) for indirect suppliers?

- none

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified in the reporting period weighted and, if applicable, prioritised and, if so, on the basis of what appropriate criteria?

- Yes, based on the expected severity of the injury in terms of degree, number of people affected and irreversibility
- Yes, based on own power of influence
- Yes, based on probability of occurrence
- Yes, based on type and scope of own business
- Yes, based on the type of contribution to causation

Describe in more detail how the weighting and prioritisation process was carried out and what considerations were made.

Own business area:

The risks were appropriately weighted and prioritised through interviews with internal and external experts. External experts with experience from peer groups contributed to the discussion on the weighting and prioritisation of risks. Internal experts based their weighting and prioritisation of the risks on their experience with the implementation of the UK Modern Slavery Act and the reports received on this topic in the past via the whistleblower hotline.

The weighting and prioritisation of a risk resulted from the combination of the possible degree of severity of the breach, the number of people potentially affected and the irreversibility in the event of a risk occurring.

For each risk, possible indicators were identified in various separate business areas and rated on a scale of 1 to 3 based on the above criteria. In particular, the rights to personal integrity and freedom were taken into account.

Finally, a comparative scaling was carried out to verify the overall assessment.

Supply chain:

The distinction between "high", "medium" and "low" risks is determined by the supplier profile and the methodology described above. The categorisation of suppliers into the risk areas "medium" to "high" resulting from the gross risk analysis led to a closer look at these suppliers. In the hotel sector, all of the suppliers categorised as "medium" to "high" were audited separately and were able to provide evidence of valid certification. The certification was awarded by independent experts in accordance with the guidelines of the Global Sustainable Tourism Council (GSTC). The GSTC is an internationally recognised, non-profit organisation that promotes fundamental sustainability-related standards in the tourism sector at a global level and was, among others, established by the United Nations Foundation.

As explained above, the risk questionnaires were sent out in other purchasing areas. Despite repeated requests, only a few meaningful questionnaires were returned. Nevertheless, in order to ensure an appropriate risk assessment, the relevant suppliers were again subjected to a more detailed internal assessment. The risks were weighted and prioritised by consolidating the summarised relevant country and industry risks. The results were then validated internally once more. This weighting and prioritisation resulted in the aforementioned prioritised risks for the supply chain.

B. Risk analysis and preventive measures

B2. Preventive measures in own business area

Which risks were prioritised in the own business area during the reporting period?

- Disregard for occupational health and safety and work-related health hazards

What specific risk is involved?

Disregard of applicable health and safety regulations

These risks can potentially include failure to comply with instructions on the ergonomic use of office furniture, insufficient number of first aiders/fire protection and evacuation personnel, exceeded test dates for fire extinguishers', failure to comply with the specifications for the design of the workplace outside the company building, defective electronic equipment, disregard of required break times, failure to differentiate between working/duty hours due to mobile working.

Where does the risk occur?

- Austria
- China
- Denmark
- Finland
- Germany
- Poland
- Sweden
- Switzerland
- Tanzania

B. Risk analysis and preventive measures

B2. Preventive measures in own business area

What preventive measures were implemented for the reporting period to prevent and minimise the priority risks in your own business area?

- Implementation of training courses in relevant business areas
- Implementation of risk-based control measures
- Other/additional measures: Group policy management

Implementation of training courses in relevant business areas

Describe the measures implemented and in particular specify the scope (e.g. number, coverage/area of application).

Various training programmes were made available to TUI Group employees via the Group-wide training platform. These included child protection, human rights, occupational health and safety and compliance.

In addition, special training courses were held for specific employee groups, for example child welfare and protection training for entertainment and childcare staff and introductory training on the UK Modern Slavery Act for employees in purchasing and procurement. A special training campaign on the duties of care arising from the GSCA was developed in 2023 and assigned to all TUI Group employees globally at the beginning of December 2023.

Occupational health and safety were also extensively trained as priority risks:

In 2023, employees of German Group companies were instructed in general occupational safety via online training. First aid and fire safety training courses were also held for the relevant target group.

In addition, managers of German Group companies have been encouraged and committed to draw the attention of their respective employees to potential occupational health and safety hazards by means of training courses offered. Employees are trained at least once a year on both general and specific topics, such as the ergonomic use of office furniture.

Describe the extent to which training to prevent and minimise the priority risks is appropriate and effective.

The training courses are assessed as appropriate, as they can specifically make employees in the relevant areas aware of possible risks and can therefore have a preventative effect. The training courses are assessed as effective as they provide information on how to identify and report violations and/or avoid them, particularly with regard to the priority risks of occupational health and safety, all forms of slavery and forced labour, and child labour.

In addition, all employees of German Group companies are trained annually on occupational safety in order to minimise the priority risk of disregarding occupational safety and work-related health hazards.

Implementation of risk-based control measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

Occupational safety specialists use risk assessments to ensure that measures are developed to minimise risks. These measures are communicated to employees through training and must be adhered to. Topics such as Covid infection, maternity leave, mobile working and business trips are also taken into account. The resulting measures to minimize risk include, for example, the assessment of the mobile workplace, Covid prevention measures and health checks for business travellers.

In addition, employees' workstations are assessed in terms of occupational health and safety and ergonomic use. There are also regular coordination meetings with the building management to ensure that the office space is appropriately designed. Safety officers help TUI as an employer to comply with health and safety regulations. They are appointed by the management and support all areas of the company in order to prevent accidents, work-related illnesses and health hazards. All committees (employee representatives) were informed in joint meetings with the management on occupational safety and further measures to minimise risks were discussed.

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

The measures described above are considered appropriate because the annual occupational safety training makes employees aware of the topic. Assessing employees' mobile workplaces also increases transparency on the topic of occupational safety. The priority risk of a threat to employees' health is effectively reduced by health checks in preparation for business trips. Office inspections are appropriate to check the implementation of safety standards and thus effectively ensure the ergonomic handling of office equipment and health protection for employees.

Other/further measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

Group policy management

1. The Integrity Passport - the TUI Code of Conduct - is binding for all employees, from the Executive Board to trainees, and for all managed Group companies. As a Code of Conduct, it sets out guidelines on key topics such as compliance or sustainable behaviour for day-to-day work and in conflict situations and explains how concerns can be reported within the Group via the central whistleblower system. As part of the mandatory training, the content of the Integrity Passport has been translated into fourteen languages and is known to employees. There is also a website on the intranet that displays all Group guidelines, including the Integrity Passport, and gives the name of a contact in case there are questions.
2. In the past financial year, a special training course on the GSCA was developed, which was assigned to all TUI Group employees in December 2023. This training explains all obligations arising from the GSCA and raises awareness on how to report potential violations.
3. The Modern Slavery Act Statement is a Statement made pursuant to section 54 of the Modern Slavery Act 2015. It describes all measures that the TUI Group is taking and has taken to prevent modern slavery and human trafficking in its own business and within the supply chain in order to mitigate the corresponding risks. Since 2017, this declaration has been published annually on the homepage, see here: <https://www.tuigroup.com/de-de/verantwortung/Menschenrechte-und-moderne-Sklaverei/Erklaerung-zum-modernen-slavery-act>.
4. The TUI Global Employment Statement is a declaration by TUI AG focusing on fair and responsible treatment of all employees and compliance with applicable laws and industry standards. TUI expects both employees and contractual partners to comply with the requirements of the Global Employment Statement.

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

The above measures are considered appropriate and effective. The Integrity Passport provides guidance to TUI Group employees on how to deal with the most important legal and integrity issues in their day-to-day work with colleagues, customers, business partners and other third parties. To ensure that employees understand the content of the document, it has been translated into fourteen languages and is available on the intranet.

Training on the GSCA was provided to all TUI Group employees. The main aspects of the GSCA were explained. By raising employees' awareness to these issues, potential violations can be identified much more quickly and measures can be taken to minimize risks. Potential risks can be easily reported via the established whistleblower system and, if necessary, contact can be quickly established with the contractual partner.

Public declarations such as the Modern Slavery Act Statement and the TUI Global Employment Statement clarify the requirements TUI has for employees and contractual partners. This contributes significantly to compliance with applicable laws and standards. The transparent presentation ensures that all those involved are aware of the expectations placed on them.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

Which risks were prioritised for direct suppliers during the reporting period?

- Prohibition of hiring or using private/public security personnel who may cause harm due to lack of training or supervision
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association and the right to collective bargaining
- Prohibition of forced labour and all forms of slavery
- Prohibition of withholding an appropriate wage

Prohibition of hiring or using private/public security personnel who may cause disruption due to lack of training or control

What specific risk is involved?

The risk analysis has revealed specific risks with regard to the commissioning of private/public security personnel and the resulting potential adverse effects.

Where does the risk occur?

- Egypt
- Mexico
- Morocco

Disregard for occupational health and safety and work-related health hazards

What specific risk is involved?

As part of the risk analysis, specific occupational safety and work-related health risks were identified among direct suppliers.

Where does the risk occur?

- Cape Verde
- Egypt
- Mexico
- Morocco

Disregard for freedom of association and the right to collective bargaining

What specific risk is involved?

Another specific risk for direct suppliers is the threat to freedom of association and the right to collective bargaining.

Where does the risk occur?

- Cape Verde
- Egypt
- Mexico
- Morocco

Prohibition of forced labour and all forms of slavery

What specific risk is involved?

The occurrence of possible forms of forced labour amongst direct suppliers was also identified as a specific risk as part of the risk analysis.

Where does the risk occur?

- Cape Verde
- Egypt
- Mexico
- Morocco

Prohibition of withholding an appropriate wage

What specific risk is involved?

In addition, the non-payment of appropriate wages by direct suppliers was analysed as a specific risk.

Where does the risk occur?

- Cape Verde
- Egypt
- Mexico
- Morocco

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

What preventive measures were implemented for the reporting period to prevent and minimise the priority risks among direct suppliers?

- Integration of expectations into the supplier selection process
- Obtaining contractual assurance for compliance with and implementation of expectations along the supply chain
- Training and further education to enforce the contractual assurance
- Other/further measures:
 - For hotels: Check whether there are currently valid sustainability seals that are verified by independent companies and follow the guidelines of the Global Sustainable Tourism Council, as these cover human rights and environmental issues.
 - Industry-wide collaboration

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective.

From 2023, the TUI Group's contract negotiations with suppliers will include updated General Terms and Conditions and the Supplier Code of Conduct. It is therefore mandatory for suppliers to include at least the updated Supplier Code and/or the new Terms and Conditions in the contract. In all other cases, suppliers were asked to complete a risk questionnaire to ensure compliance with the standards of the GSCA. These measures are considered appropriate as suppliers are thereby made aware of the due diligence obligations to be observed, which can subsequently lead to effective risk prevention.

Within TUI Musement, all contract templates for transport, accommodation, activities and restaurants in destinations have been adapted as described above. The use of these standard contract templates ensures that the requirements of the GSCA are taken into account in newly agreed contracts. Priority for sending out questionnaires was given to suppliers who were identified as medium or high risk or to those suppliers who declined to implement the updated standard contract templates.

These measures were used to inform suppliers about the content and requirements of the GSCA.

In addition, contracted hotels were reviewed as to whether they had an existing sustainability seal and whether it was up to date. The review was carried out by independent experts. The certificates must comply with the guidelines of the Global Sustainable Tourism Council (GSTC). To receive a certificate, comprehensive management systems must be implemented, including checks on human rights and environmental risks. As these sustainability seals were developed specifically for hotels and are geared towards any risks relating to human rights and the environment, they make a decisive contribution to minimizing risks.

The implementation of the "Diverse, Sustainable and Ethical Sourcing" Group policy in September 2023 introduced criteria into the procurement process that helps take into account the diverse, ethical and sustainable attributes of suppliers. The list of questions resulting from the Policy is embedded in the Group Procurement tendering platform. In order to participate in a tender, all suppliers must complete the questionnaire. The answers from the questionnaire are evaluated by the Procurement department and the relevant technical experts. The results of the evaluation is incorporated into the overall assessment and the final contract award. The procurement team is trained to be sensitive to diverse, ethical and sustainable

procurement issues. Raising employee awareness ensures that potential problems are identified and appropriate measures can be taken.

Suppliers within central purchasing were contacted by letter informing them of the due diligence obligations arising from the GSCA. This letter required suppliers to accept the updated Supplier Code of Conduct and to confirm its content and requirements.

In addition, the whistleblower system implemented throughout the Group and the associated complaints procedure ensure that employees, suppliers and any external personnel have the opportunity to raise concerns confidentially and anonymously. Potential risks can be easily reported via the whistleblower system and, if necessary, contact can be quickly established with the contractual partner in order to take any necessary measures to minimise or prevent a breach of due diligence obligations.

Industry-wide co-operation:

To support industry-wide progress, TUI continues to be active on the boards of the Global Sustainable Tourism Council (GSTC) and Travelife. Both associations deal with issues such as human rights and environmental protection, the results of which are reflected in the sustainability certification standards for hotels. TUI is also a member of the board of Futouris, the Germany-wide initiative for sustainable tourism. In this context, cross-industry solutions are developed on the basis of project work on, for example, environmental protection and human rights issues, such as basic training on the GSCA for suppliers in the tourism industry.

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

Which risks were prioritised based on the event-related risk analysis for indirect suppliers?

- none

If no risks have been selected, give reasons for your answer.

As there were no incidents or substantiated indications of a significantly changed or significantly increased risk situation within the indirect supply chain, no event-related risk analysis had to be carried out.

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

What preventive measures were implemented for the reporting period to prevent and minimise the priority risks among indirect suppliers?

- Development and implementation of suitable procurement strategies and purchasing practices
- Other/additional measures: supplier contracts and supplier code of conduct

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/scope).

By implementing the amended General Terms and Conditions and the updated Supplier Code of Conduct in contracts with direct suppliers, they are required to pass on the expectations and obligations arising from the GSCA to their suppliers, TUI's indirect suppliers.

Describe the extent to which the measures to prevent and minimise the priority risks are appropriate and effective

The contractual obligation to pass on the requirements resulting from the GSCA in the supply chain by the direct supplier is considered appropriate and effective. Direct suppliers are required to implement appropriate measures with their immediate suppliers in order to prevent risks.

B. Risk analysis and preventive measures

B5. Communicating the results

Were the results of the risk analysis(es) for the reporting period communicated internally to relevant decision-makers?

It is confirmed that the results of the risk analysis(es) for the reporting period were communicated internally to the relevant decision-makers, such as the Executive Board, the management or the purchasing department, in accordance with Section 5 (3) GSCA.

- Confirmed

B. Risk analysis and preventive measures

B6. Change in risk disposition

What changes have occurred with regard to priority risks compared to the previous reporting period?

As the law only came into force on 1 January 2023, there is no previous comparative reporting period.

C. Identification of violations and corrective measures

C1. Identification of violations and corrective measures in own business area

Were any violations identified in your own business area during the reporting period?

- Yes, only abroad

Please specify: In which topics were violations identified in your own business area?

- Disregard for occupational health and safety and work-related health hazards

Enter the number

1

Describe the appropriate remedial action you have taken.

The complaint related to the condition of an employee's accommodation in a target area.

The allegation received via the complaints procedure was addressed to the responsible HR department.

During the investigation of the case, part of the allegation was substantiated.

The accommodation was renovated as an appropriate remedy.

In cases where violations could not be stopped, describe where they occurred.

The violation was stopped.

Describe what long-term remedial measures (e.g. follow-up concepts) have been taken and what considerations were made with regard to the selection and design of measures to stop or further minimise.

By addressing the staff responsible for the employee's accommodation, awareness of the issue of occupational safety and the condition of the accommodation in the target area was reinforced. Further awareness was raised within the HR department via the training on the GSCA.

Describe how the effectiveness of the corrective measures is verified.

The effectiveness of the measure is reviewed on site using the criterion of further incoming complaints from employees.

Have the remedial measures led to the cessation of the violation?

- Yes

Explain.

After contacting the responsible HR department to investigate the report, the accommodation was renovated, which ended the violation of the risk "Disregard for occupational health and safety and work-related health hazards".

Have you analysed to what extent the identified violation is an indication of a possible need to adapt/add to existing preventative measures? Please describe the process, results and impact of your analysis.

The identified violation and the resulting need to adjust the preventative measures are analysed on a case-by-case basis in coordination with the relevant business areas.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective measures among direct suppliers

Were any violations identified among direct suppliers during the reporting period?

- yes

Describe the basis on which the identified violations were weighted and prioritised and what considerations were made in the process.

All identified violations were prioritised and weighted equally.

In which areas were violations identified among direct suppliers?

- Prohibition of child labour

Enter the number

1

Describe the appropriate remedial action you have taken.

The customer complaint received related to an event involving artists in a hotel in Turkey in which an underaged child was allegedly involved.

The allegation received via the complaints procedure was addressed to the management of the hotel. During the investigation of the case, it was established that the fourteen-year-old minor participating in the artistic show was the son of one of the performers.

In order to prevent a repeat of such an incident, the supplier responsible for the performance was given a written warning and expressly informed that minors are not permitted to provide services.

Describe which considerations are made with regard to the selection and design of the measures as part of the corresponding follow-up concepts for termination and minimisation.

Under the existing contract with the service provider, the service provider was already obliged to guarantee fair working conditions, to fulfil all applicable legal obligations and to take measures for occupational health and safety.

Therefore, further measures that could be considered were cancellation of the service contract and a warning. However, as termination does not end the underlying risk of "child labour" per se, the supplier was sent a written warning. In addition, the service provider was once again made aware of the issue of compliance with human rights via emphatic communication.

Describe how the effectiveness of the corrective measures is verified.

Through the investigation of the case, the management of the hotel has been reminded of the importance of respecting human rights and avoiding child labour. Following this incident, it was confirmed that this was an exceptional case and that no other minors (apart from guests) were allowed to enter the hotel.

Have the remedial measures led to the cessation of the violation?

- Yes

Explain.

Various processes are in place to ensure that, apart from guests, no minors enter the hotel grounds.

Have you analysed the extent to which the identified violation is an indication of a possible adaptation/addition to existing prevention measures?

The identified violation and the resulting need to adjust the preventative measures are analysed on a case-by-case basis in coordination with the relevant business areas.

C. Identification of violations and corrective measures

C3. Identification of violations and corrective measures among indirect suppliers

Were any violations identified among indirect suppliers during the reporting period?

- No

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- Company's own complaints procedure

Describe the company's own process and/or the process in which your company participates.

The TUI Group has had a complaints procedure in place since 2009. The TUI SpeakUp Line, a whistleblowing system purchased from an external service provider, is a confidential channel through which concerns can be reported anonymously and confidentially to the TUI Group's Integrity & Compliance Team by telephone or online at any time (365 days a year, day or night). The reports are processed by the Integrity & Compliance Team or forwarded to the responsible person in the relevant department within the TUI Group for processing. The rules of procedure and information on the TUI SpeakUp Line are publicly accessible via the following homepage: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

or can be requested by e-mail to compliance@tui.com or by letter to the Integrity & Compliance Team, TUI AG, Karl-Wiechert-Allee 23, 30625 Hanover.

The effectiveness of the complaints procedure is reviewed at least once a year and, if necessary, on an ad hoc basis. The complaints procedure is continuously adapted in accordance with the legal requirements.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Which potentially involved parties have access to the complaints procedure?

- Own employees
- Communities near own locations
- Employees of suppliers
- External stakeholders such as NGOs, labour unions etc.
- Others: all have access to TUI's complaints procedure (see explanation above)

How is access to the complaints procedure ensured for the various groups of potentially involved parties?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and comprehensible
- All information is openly accessible

Publicly accessible rules of procedure in text form

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on accessibility

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on responsibility

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

Information on the process

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

All information is clear and comprehensible

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

All information is openly accessible

Optional: Describe.

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Were the rules of procedure for the reporting period publicly available?

File was uploaded

The Rules of Procedure:

This is the website from which the rules of procedure can be downloaded:

German: <https://www.tuigroup.com/de-de/verantwortung/wie-melde-ich-bedenken>

English: <https://www.tuigroup.com/en-en/responsibility/how-to-raise-a-concern>

This is the direct link to the rules of procedure:

German: https://www.tuigroup.com/damfiles/default/tuigroup-15/de/ueber-uns/compliance/Lieferkettengesetz/compliance-verstoesse-melden/Wie_melde_ich_Bedenken_v_2.1.pdf-56cea0f059a1ebf47fae8913b0615767.pdf

English: https://www.tuigroup.com/damfiles/default/tuigroup-15/en/about-us/Compliance/GSCA-complaints-procedure/How_to_raise_a_concern_2.1.pdf-916755228808dccc2acb67163fe6406e.pdf

D. Complaints procedure

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

Dr. Dietmar Deffert - Group Director Integrity & Compliance

It is confirmed that the criteria contained in Section 8 (3) GSCA is met by the responsible parties, i.e. that they guarantee impartial action, are independent and not bound by instructions and are obliged to maintain confidentiality.

- Confirmed

D. Complaints procedure

D2. Requirements for the complaints procedure

It is confirmed that precautions were taken during the reporting period to protect those potentially involved from being disadvantaged or penalised as a result of a complaint.

- Confirmed

Describe what precautions have been taken, in particular how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

TUI uses an external service provider for the complaints procedure. The confidentiality of the identity of whistleblowers is ensured by technically restricting access to the whistleblowing system. Only the responsible parties and authorised individuals named in the rules of procedure and in the "Group Works Agreement on the Electronic Whistleblowing System and Procedure" concluded for this purpose have access. Messages received by telephone are transcribed so that no employee can recognise the whistleblower by their voice. In addition, the involvement of a service provider makes it technically impossible for TUI to trace the message back to the whistleblower.

Describe what precautions have been taken, in particular what other measures are in place to protect whistleblowers.

Whistleblowers are informed when they first make contact via the electronic whistleblowing procedure that the system is used anonymously during all steps of the procedure, unless a personal note is left. In this case, the name of the whistleblower will be treated confidentially. If the whistleblower leaves personal data, they will be informed of their right to withdrawal and given a contact address for the further handling of personal data. It is made transparent that in certain cases, despite revocation, TUI may be obliged to pass on personal data in order to protect legal rights.

The Group Works Agreement also ensures that whistleblowers do not have to fear sanctions if they provide information in good faith and for altruistic reasons. An exception applies to whistleblowers who deliberately and falsely denounce the company.

D. Complaints procedure

D3. Implementation of the complaints procedure

Did you receive any information about the complaints procedure during the reporting period?

- Yes

Give details of the number, content, duration and outcome of the procedures.

During the reporting period, 49 reports relating to the GSCA were received. All cases were investigated and, if necessary, further measures were taken. All reports received related to human rights risks. The average time taken to conclude the complaints procedure, from receipt to closure of the case, was 74 days.

On which topics have complaints been received?

- Prohibition of child labour
- Disregard for occupational health and safety and work-related health hazards
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage

Describe the conclusions drawn from the complaints/reports received and the extent to which these findings have led to adjustments in risk management.

Conclusions from the complaints/reports and adjustments to risk management will be made in the future.

E. Review of risk management

Is there a process in place to review the appropriateness and effectiveness of risk management across the board?

In which of the following areas of risk management is the appropriateness and effectiveness checked?

- Resources & expertise
- Risk analysis and prioritisation process
- Preventive measures
- Remedial measures
- Complaints procedure
- Documentation

Describe how this audit is carried out for the respective area and what results it has led to, in particular with regard to the prioritised risks.

Risk identification and management utilise the existing structures of the Group-wide risk management system. The TUI Group's Internal Audit department continuously reviews the appropriateness and effectiveness of the system at its own discretion. This assessment particularly considers risk identification processes and their corresponding countermeasures. Where risks arise that are affected by the GSCA, these are also reviewed.

Previous audits have taken into account, among other things, planning processes and action planning that fundamentally address all prioritised risks and have specifically recommended continuity in the form of a structured management system. In addition, a further audit has taken into account the continuity process of the structured management system as well as the internal resources and organisational units within the Group. Further audits in this financial year will also consider, among other things, compliance with selected human rights risks, such as in the case of a remote destination.

E. Review of risk management

Are there processes or measures in place to ensure that the interests of your employees, the employees within your supply chains and those who may otherwise be directly affected in a protected legal position by the economic activities of your company or by the economic activities of a company in your supply chains are adequately taken into account in the establishment and implementation of risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

- Resources & expertise
- Preventive measures
- Remedial measures
- Complaints procedure

Describe the processes and measures for the respective area of risk management.

The interests of potentially affected parties are taken into account in various areas of risk management.

Resources/expertise:

As described above, various departments are involved in the implementation of the TUI Group's human rights strategy. Cross-departmental dialogue gives the company the opportunity to cover other interests of relevant stakeholders and potentially affected parties. For example, the results of audit and risk processes carried out by the occupational health and safety team can serve as indicators for expanding further preventative measures in the company's own business area.

Multi-stakeholder initiatives:

TUI participates in various industry initiatives, including Futouris e.V. This form of collaboration with other companies in the industry and relevant stakeholders offers the opportunity to recognise additional interests of potentially affected parties, especially within the supply chain, and develop appropriate measures.

Preventive measures:

Existing preventive measures protect the interests of those potentially affected. Examples include training initiatives in areas such as human rights, occupational health and safety and compliance. Additionally, through regular dialogue with the Group Works Council the interests of employees are taken into account in risk management.

Remedial measures:

When identifying violations and remedial measures among direct suppliers, conclusions can also be drawn about the interests of other potentially affected parties. For this reason, when a corrective measure is completed, a case-based review is carried out to determine whether there is a need to establish further preventive measures so that other potentially affected parties within the supply chain can also be adequately protected against such violations.

Complaints procedure:

From reports or confirmed cases that the company receives as part of the complaints procedure, it is sometimes possible to draw conclusions about the interests of those potentially affected. If this is the case, the company subsequently initiates appropriate preventive measures based on these findings.