



Human Rights Policy

Amadeus Group Corporate Policy



Contents

- 1. Purpose 3
- 2. Scope 3
- 3. Policy 4
- 4. Due Diligence and Human Rights Risk Assessment 7
- 5. Non-Compliance with Policy and consequences 7
- 6. Conflicts with Local Laws and Regulations 8
- 7. Governance and accountability 9
- 8. Update, implementation and supervision 9

Document control	
Security level	Public
Company	Amadeus IT Group SA
Department	Sustainability Office
Approved by	Chief Risk and Compliance Officer, SVP General Counsel
Date	31/12/2024

1. Purpose

The purpose of this Human Rights Policy (hereinafter, the "**Policy**") is to formalize Amadeus' commitment to respect and promote human rights in its activities and supply chain.

This Policy derives from Amadeus' [Sustainability Policy](#), which contains the commitments, objectives, governance and reporting mechanism to be followed in terms of sustainable development.

This Policy develops the [Code of Ethics and Business Conduct](#) provisions regarding the respect for human rights and contributes to promoting a respectful, integral and equitable society, strengthening social commitment and equal opportunities.

The definition of this Policy and, in general, all of Amadeus' actions are based on the main international benchmarks established by the United Nations, which are listed below:

- United Nations Global Compact.
- The Universal Charter of Human Rights, which constitutes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the Covenant on Economic, Social and Cultural Rights.
- Fundamental rights in the eight core conventions of the International Labor Law (ILO) as set out in the Declaration on Fundamental Principles and Rights at Work.
- United Nations Guiding Principles (UNGPs) on Business and Human Rights.
- Organization for Economic Cooperation and Development's Guidelines for Multinational Enterprises.
- European Social Charter

2. Scope

This Policy applies to *Amadeus IT Group S.A. and all Amadeus Group companies* where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies or joint venture that have agreed to be bound by this Policy.

This Policy applies to *eligible Amadeus Group third parties* who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents ("Third Parties")



Such Third Parties in turn are required to use their best efforts to extend the principles embodied in this Policy and the [Code of Ethics and Business Conduct for Third Parties](#), to their relevant vendors, contractors and business partners who are engaged in the provision of services or products for Amadeus.

3. Policy

Amadeus commits to identify and address actual and potential adverse impacts on human rights in its activities and supply chain.

Amadeus human rights commitments, fundamentally are:

3.1 Commitment to employees

- **Fair and favorable working conditions**

To employ *zero tolerance towards child labor, abuse and exploitation* throughout our activities and supply chain and seek to ensure adequate remediation insofar as such maltreatment is discovered.¹

To commit to ensure that there is *no modern slavery or human trafficking* in our supply chain or any part of our business.

To adhere to the *applicable laws and regulations* of the countries and regions in which it operates with specific regulation in anti-slavery and human trafficking.

All employees, including migrant workers, are provided with working conditions, wages, benefits that are fair and in accordance with local legislation.

- **Fair wages/compensation**

To establish that every worker has the *right to fair compensation* for his/her work.

To commit to remunerating employees in line with the labor market best practices and local legislation. Remuneration policies are always established based on *equal remuneration*.

- **Freedom of association/collective bargaining**

To reaffirm its support to the *freedom of association* and the right to collective bargaining.

To commit to complying with the *ILO Conventions* with respect to freedom of association and trade union rights, fully acknowledging the right to organize and the

¹ This statement uses the applicable local legislation to determine the definition of a child

AMADEUS

right of unions to represent and negotiate on behalf of employees, without prejudice to existing local legislation.

- **Diversity, inclusion and non-discrimination**

To value and respect *the differences of our workforce*. Commit to ensuring that every single employee is treated with respect, dignity, and fairness and that they are given equal opportunities. This means that through recruitment, compensation and benefits, training, development, promotion, transfer, mobility, and termination - individuals are solely assessed based on their merit and their ability to meet the requirements and standards of the role and that they are not discriminated against.

Valuing diversity and inclusion means accepting and respecting differences between and within cultures, while acknowledging and endorsing differences based on gender, gender expression, gender identity, parental status, age, race, ethnicity, beliefs, social origin, sexual orientation, and disabilities.

- **Health and safety**

To require that each company or legal entity comply with all the regulations and standards incumbent upon businesses in relation to the health and safety of their employees, to *develop a healthy workplace* that protects and promotes their health, safety and wellbeing.

- **Reconciliation and rest**

To guarantee employees' *right to rest and leisure time* and facilitate the *reconciliation of personal and professional life* by reasonably limiting the length of the working day.

- **Freedom of expression**

To promote *freedom of opinion, thought, information and expression*, respect the diversity of opinions, encouraging dialogue and communication.

3.2 Commitment to society and local communities

- **Privacy and cybersecurity**

To respect the *privacy and integrity of all stakeholders*, whether internal or external.

Being a trusted partner depends critically on the safe, secure, reliable, and efficient processing of personal information, including passenger data and other information about customers and their clients. Such information is handled with the utmost care and in accordance with Amadeus extensive privacy and security policies.

- **Clean, healthy and sustainable environment**

amadeus

To embed sustainability in all its activities and to *foster environmental sustainability among its stakeholders*. Amadeus' [Code of Ethics and Business Conduct](#) and [Environmental Policy](#) includes commitments and objectives related to the environment and establish guidelines and best practices to contribute to the fight against climate change, prevent pollution in production processes, promote the circular economy, the appropriate use of water resources and the protection of biodiversity and nature.

- **Fight against corruption and bribery**

To carry out activities in compliance with applicable regulations, regardless of the countries in which it operates.

To *promote free competition and condemn corruption* in all its forms, apply measures and procedures to its prevention according to Amadeus' policies, insofar as applicable.

- **Minority and community rights**

To the *socio-economic development of the communities* in which it operates through the professional development of its employees, to actively listen to our stakeholders in communities in which we develop our activity.

To pay special attention to individuals in vulnerable groups, pursuing opportunities to support human rights in areas where a positive impact can be made through our *community impact initiatives in local communities*.

3.3 Commitment to respect human rights in Amadeus supply chain by Amadeus' Third Parties

- Amadeus' Third Parties, will comply with this *Human Rights policy* and our [Code of Ethics and Business Conduct for Third Parties](#), and commit to applying similar, and no less stringent, policies to their supply chain.
- Amadeus seeks to establish relationships with organizations that respect and do not infringe on human rights, expecting Third Parties to use their best efforts to *conduct human rights due diligence and risk assessments* throughout their supply chain, and to have implemented governance and compliance systems.
- Where Amadeus Third Parties are identified as having caused or directly contributed to adverse human rights impacts, Amadeus requires such Third Party to take prompt appropriate *remediation action*.
- Violation of this Policy is considered by Amadeus as *a material breach of its business/commercial and contractual relationship* and may therefore also result in suspending or terminating the business/commercial relationship with a Third Party or the adoption of the corresponding corrective action plans.

4. Due Diligence and Human Rights Risk Assessment

Recognizing the United Nations Guiding Principles of Business and Human Rights, Amadeus commits to *conduct human rights due diligence, internally and externally* in its relations with its stakeholders.

Specifically, Amadeus will:

- Identify, evaluate, prioritize and address *human rights risks and potential adverse impacts of its activities* and supply chain, according to a defined assessment methodology. This may include seeking further assurance from Third Parties.
- Include human rights as a *basic risk in the corporate risk catalogue*.
- Conduct awareness-raising efforts about the *responsibility to respect human rights* and strengthen internal capabilities for management of human rights.
- Have a *complaint mechanism* for any stakeholder to report any suspected business practices and/or conduct in breach of this Policy.

Where it is identified that Amadeus has caused or directly contributed to adverse human rights impacts, it shall take appropriate *remediation action*.

Amadeus will regularly *review and update* its due diligence procedures and risk assessments.

5. Non-Compliance with Policy and consequences

Non-compliance with this Policy can have ethical, moral and potentially legal implications. Accordingly, violations of this Policy may result in *disciplinary and other legal actions*, subject to applicable local labor laws and regulations.

Should anyone subject to this Policy suspect or strongly believe that a violation of this Human Rights Policy, other Amadeus internal policies and regulations or applicable legislation, take place, they should *report it*.

The *Amadeus [Speak-Up Policy](#)* guarantees that the report will be handled by the Amadeus Corporate Compliance & Investigations team and treated with utmost confidentiality and anonymity. It also guarantees that reporting parties will not be subject to any retaliation when filing a report in good faith.



To ensure confidentiality, anonymity and no retaliation, reports should be filed through the following *Speak Up Reporting channel* available [here](#). Please set up a “*secured postbox*”, if you choose to stay anonymous, which will allow communication with the investigative team including a report status.

6. Conflicts with Local Laws and Regulations

If any of the provisions of this Policy infringe on or conflict with applicable local legal provisions, laws, or regulations, then such *local provisions, laws, or regulations*, as applicable, will prevail.

7. Governance and accountability

Amadeus' governance of human rights is based on the following:

The *ESG Steering Committee* is in charge of the approval of this Policy and acts as a delegated body of the *Executive Committee* that will act as final validator of all decisions.

The *Sustainability (ESG) Office* and *ESG Steering Committee* have the responsibility for ensuring adherence to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the [Speak-Up channel](#) and handled by the *Corporate Compliance & Investigations* department.

The integrity of the governance model will be ensured through existing coordination mechanisms, Amadeus will apply its "*Three Lines Model*" for risk management:

1st Line: executive management, management and staff.

2nd Line: internal governance functions.

3rd Line: Group Internal Audit.

Issues related to the Amadeus supply chain that impact human rights will be reported in accordance with the requirements of this Policy and other internal regulations.

8. Update, implementation and supervision

The Policy is *available publicly* and accessible to all Amadeus stakeholders.

The Policy will be *reviewed and updated* periodically and, in any case, every two years.

The *Board of Directors*, through the *Audit Committee*, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and receiving assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.

For any question regarding this policy, please refer to the *Amadeus Sustainability (ESG) Office* (sustainability@amadeus.com)