

NON-FINANCIAL DECLARATION OF TUI GROUP

For TUI Group, sustainability in all three dimensions – economic, environmental and social – is a fundamental management principle. We firmly believe that sustainability is critical to long-term economic success. We understand sustainable transformation as an opportunity.

Ever since the year 2000, TUI provided Group-level information on sustainability matters in its Annual Report. The sustainability declaration published for financial year 2025 constitutes the combined non-financial declaration of TUI AG and TUI Group. The non-financial declaration was prepared pursuant to sections 289b et seq. and 315b to 315c of the German Commercial Code (HGB) and based on application of part of the European Sustainability Reporting Standards, (ESRS, EU 2023/2772), which are derived from the EU Corporate Sustainability Reporting Directive, CSRD, EU 2022/2464.

Regardless of the legal uncertainty resulting from the lack of transposition of the CSRD Directive on Sustainability Reporting into German legislation as at the reporting date, TUI Group has decided to apply the ESRS derived from the CSRD for the first time in preparing the combined non-financial declaration of TUI Group as a framework pursuant to section 315c (3) in combination with section 289d of the German Commercial Code (HGB). The 2025 reporting is based for the first time on the European Sustainability Reporting Standards (ESRS) and has been adjusted in preparation for the implementation of European regulation. Prior-year figures, unless stated otherwise, have not been restated; therefore, comparability with previous reports is limited.

This declaration complements TUI Group's management report contained in the present Annual Report and presents key developments in non-financial matters. The contents of this declaration were examined by TUI Group's Supervisory Board pursuant to section 171 (1) of the German Stock Corporation Act (AktG). The declaration was also reviewed by our independent auditor, who issued a limited assurance opinion.

The declaration is a component of our Annual Report 2025, which is published as an online report and as a pdf file on our corporate website.

In the framework of our double materiality assessment process, required under CSRD, we have identified the material impacts, risks and opportunities (IROs) for each topical ESRS standard, resulting in disclosure of the following ESRS sustainability topics:

- General disclosures in accordance with ESRS 2
- Climate change (E1)
- Disclosures under the EU Taxonomy Regulation (EU) 2020/852
- Own workforce (S1)
- Workers in the value chain (S2)
- Consumers and end-users (S4)
- Business conduct (G1)

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General information pursuant to ESRS 2

General basis for preparation of the non-financial declaration (BP-1)

This non-financial declaration was prepared on a consolidated basis for TUI Group as a whole. The scope of consolidation applied by TUI is the same as for the consolidated financial statements. This non-financial declaration therefore comprises TU AG and all subsidiaries included in consolidation.

For further information, please refer to the section [Principles and methods of consolidation](#) in the Notes

Climate change-related disclosures additionally included TUI Cruises as a joint venture between TUI AG and Royal Caribbean Cruises Ltd. in relation to the targets. Reference to the inclusion is provided in the relevant sections. All disclosures in this statement refer to financial year 2025, i.e. the period from 1 October 2024 to 30 September 2025. In preparing the non-financial declaration, both the upstream and downstream value chains were included in the analysis of material impacts, risks, and opportunities, as well as in the identification of relevant management approaches, actions and targets. The impacts, risks, and opportunities arising from the double materiality assessment in relation to the value chain are presented in the sections dealing with the relevant topics in this statement.

TUI has not omitted any information relating to intellectual property, know-how, or the results of innovation. Furthermore, TUI has not made use of the exemption from disclosure as provided for in articles 19a (3) and 29a (3) of Directive 2013/34/EU, which relates to future developments or matters.

The non-financial declaration was based on application of part of the European Sustainability Reporting Standards.

For further information on the scope of application, please refer to the section [Disclosure requirements included in ESRS and covered by TUI Group's Non-financial declaration \(IRO-2\)](#).

Disclosures in relation to specific circumstances (BP-2)

Application of targets and metrics in the section Climate change (E1)

In section ESRS E1-6 TUI uses the same scope of consolidation for Scope 3 calculations as for Scopes 1 and 2. All emission categories are calculated using recognised methods in accordance with the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Standard, primarily using the spend-based and average value methods. To improve accuracy and data quality, TUI is working to continually increase the use of primary data. The scope of the Science Based Targets (SBT), as specified in section ESRS E1-4, differs from the scope of consolidation of the metrics specified in ESRS E1-6. For TUI Airlines, the ESRS and SBT scope are aligned. For Cruises, TUI Cruises (Mein Schiff and Hapag-Lloyd fleets) remain in scope for SBT but are considered out of scope for ESRS. Marella Cruises remain in scope for SBT and are also included in scope for ESRS. TUI River Cruises are out of scope for SBT (not operational in 2019 base year) but are included in scope for ESRS. For Hotels the SBT scope remains unchanged (owned, managed and leased hotels in the TUI Hotels & Resorts portfolio) but hotels that do not align with the financial consolidation approach are out of scope for ESRS reporting.

Reporting in accordance with TCFD (Task Force on Climate-related Financial Disclosures)

Over the past two financial years, TUI AG's climate-related disclosures were reported in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). That reporting structure has become a globally recognised framework actively requested by investors, rating agencies and other stakeholders.

In 2025, TUI AG developed its reporting further with its first-time application of the European Sustainability Reporting Standards (ESRS) as the framework for its non-financial declaration. The Standards, in particular ESRS E1 Climate Change, largely reflect the TCFD's recommendations.

The [TCFD Index](#) reference matrix in the Corporate governance report assigns the individual TCFD recommendations to the corresponding passages in the Standards, ensuring compliance with both regulatory requirements and international expectations.

The first-time application of the CSRD in financial year 2025 resulted in changes in the presentation of sustainability disclosures versus previous years' reporting.

In 2023, a climate risk analysis was carried out as part of TCFD reporting. The time horizons underlying that analysis differed from those used for the double materiality assessment. The results of the climate risk analysis were re-examined in

the materiality assessment carried out in the financial year under review, using the time horizons specified in the CSRD, and validated to determine their current relevance. Following validation, the time horizons applied correspond to those defined by the ESRS.

Disclosures under the EU Taxonomy Regulation (EU) 2020/852

In financial year 2025, the internal reports forming the basis for calculating revenues for economic activity 2.1 'Hotels, holiday, camping grounds and similar accommodation' were comprehensively redesigned. To ensure year-on-year comparability, the revenues for financial year 2024 were adjusted accordingly. Furthermore, these revenues have been adjusted to eliminate duplicate entries that were included in the previous year.

Incorporation by reference

The following disclosures were incorporated in this non-financial declaration by reference.

- Disclosures according to ESRS 2 SBM-1 – Description of the business model, strategy and value chain is incorporated in the Non-financial declaration by reference.
- Disclosures according to ESRS E1-3 Climate change mitigation actions are incorporated to the Risk report by reference.

Governance

The role of the administrative, management and supervisory bodies (GOV-1)

TUI Group's administrative, management and supervisory bodies include the Executive Board and the Supervisory Board. The Supervisory Board advises and monitors the Executive Board in the management of the Company. The Supervisory Board is responsible for appointing the members of the Executive Board. The Executive Board represents the Group in all legal and business matters. The Executive Board and the Supervisory Board closely cooperate in managing and supervising the Company. Overall responsibility for managing the Company rests with the Executive Board. All members of the Executive Board are jointly responsible for the management of the Company. In addition, each member of the Executive Board is responsible for their own area of responsibility.

For further information on individual members of the Executive Board and Supervisory Board, please refer to the chapter Corporate governance in the section [Supervisory Board and Executive Board](#) and our website <https://www.tuigroup.com/en/investors/corporate-governance/management-information>

As at 30 September 2025, the Executive Board and Supervisory Board were composed as follows:

Executive and non-executive members of the administrative, management and supervisory bodies

Executive and non-executive members of the administrative, management and supervisory bodies	Executive Board	Supervisory Board
Number of executive members	5	0
Number of non-executive members	0	20

Definitions, assumptions and calculation methods:

- The management and supervisory bodies are the Supervisory Board and the Executive Board of TUI AG.
- The Executive Board of TUI AG consists of executive members, while the Supervisory Board of TUI AG consists of nonexecutive members.

The composition of the Supervisory Board is based on the German Industrial Co-Determination Act (MitbestG) and the Articles of Association of the Company. With ten representatives each, the Supervisory Board is therefore composed of an equal number of shareholder representatives and employee representatives as at 30 September 2025. Employee representatives within the meaning of the MitbestG include one executive employee (section 5 (3) of the German Works Constitution Act) and three trade union representatives.

As at 30 September 2025, women accounted for 20% of Executive Board members (one female, four male). On the Supervisory Board, women accounted for 45% of the members (nine female, eleven male). Independent members account for 45% of the Supervisory Board members. Nine shareholder representatives on the Supervisory Board are classified as independent from the Group, its Executive Board and its majority shareholder. In accordance with Recommendation C.1

of the German Corporate Governance Code (DCGK), the Supervisory Board has developed a skills and expertise profile for the Supervisory Board as a whole and has established targets for the composition of the Board.

Together the members of the Supervisory Board cover all the skills, knowledge and experience considered to be essential with regard to TUI Group's business activities.

These include:

- Experience relevant to the tourism sector
- Strategy, innovation
- IT, digitalisation
- Accounting
- Auditing
- Sustainability reporting
- Capital market
- Risk management
- Internal control system
- Compliance
- HR
- Sustainability, corporate governance

The qualification assessment of the Supervisory Board members is carried out through a structured self-assessment based on a detailed set of criteria. The results are made comparable and then validated against CVs and other information by the chair of the Supervisory Board. In the event of any uncertainties, evidence may be requested, which was not necessary for the current qualification matrix.

For further information on the qualification matrix, please refer to the section [Qualification matrix of the Supervisory Board in the Corporate governance Report](#).

For further information on the current status of implementation of the qualification profile, please refer to <https://cdn.sanity.io/files/b6xulh2p/production/9504b5f820486042aebadb3b79247263ed692f11.pdf>

All members of the Executive Board have experience relevant to TUI's sectors, products, services and geographical locations, as well as other expertise relevant to their responsibilities. Sustainability is a task affecting various areas - environmental, social and governance (ESG) - and thus different areas of responsibility of Executive Board members. In order to ensure that the expertise of the Executive Board covers the material impacts, risks and opportunities facing the Company, particular attention is paid to ensuring that members have access to additional sources of knowledge. In particular, the Executive Board makes use of the opportunity to consult specialised experts in order to obtain in-depth analyses and recommendations on specific ESG issues as needed. These measures strengthen the Executive Board's ability to develop and implement a sound strategy comprehensively addressing the Company's sustainability goals.

The need for the Board to reflect different educational and professional backgrounds arises from the obligation to conduct business in accordance with the law, the Articles of Association and the Terms of Reference. In addition, the backgrounds of the Executive Board as a whole and its individual members should reflect the following key components:

- The Board members should have long-standing management experience, preferably also gained abroad.
- The Board as a whole should have comprehensive expertise and long-standing experience in tourism.
- The Board as a whole should have long-standing experience in the areas of strategy, innovation, IT and digitalisation, sustainability, distribution, finance, risk management and HR.

For further information, please refer to the section [Diversity concepts for the composition of the Executive Board and Supervisory Board in the Corporate governance report](#).

Responsibilities and roles

Various committees and individuals are responsible for monitoring sustainability-related impacts, risks and opportunities at TUI. The ultimate responsibility for managing, monitoring and supervising sustainability-related impacts, risks and opportunities lies with the Executive Board and the Group Executive Committee. While the Group Sustainability Team is in charge of operational implementation, the management and supervisory bodies are regularly informed and set the strategic direction.

Governance and reporting

TUI Group has a governance structure in place that determines roles and responsibilities, specified in greater detail in the Annual Report including the Sustainability Report. The Chief Financial Officer (CFO) oversees the reporting process.

Building competences and expertise

The sustainability-related expertise of the members of the Executive and Supervisory Boards is continually upgraded by participating in dialogue formats on sustainability development and discussions with the Group Sustainability team and external experts.

Governance and sustainability management



Supervisory Board

The Supervisory Board monitors the incorporation of sustainability aspects into corporate planning, in particular with regard to the composition and remuneration of the Executive Board and the sustainability-related competence of the committees.

Audit Committee

The Audit Committee of the Supervisory Board is in charge of monitoring accounting, the effectiveness of the internal control and risk management system, the audit of the financial and sustainability reports and compliance.

Executive Board and Group Executive Committee

Overall responsibility for sustainability and associated decision-making lies with TUI AG's Executive Board. The Group Executive Committee (GEC) manages TUI's business strategically, sets the long-term objectives for sustainable development and ensures implementation of the Sustainability Agenda. The Chief Executive Officer (CEO) is responsible for monitoring sustainability management.

Chief Sustainability Officer (CSO)

The Group Director Corporate & External Affairs, a member of the Group Executive Committee, assumes the role of Chief Sustainability Officer (CSO) and reports directly to the CEO. The CSO is in charge of developing and managing the sustainability strategy and provides monthly progress updates to the Executive Board and the GEC as well as regular updates to the Supervisory Board.

Sustainability Council

The Sustainability Council decides on priorities and projects for the TUI Sustainability Agenda. Managers report on progress made in achieving targets, particularly in relation to science-based targets, and agree on any further steps that may be necessary. The Council is headed by the CEO and CSO and provides regular reports to the relevant bodies.

Group Sustainability Team

The Group Sustainability Team develops, implements and manages the Sustainability Agenda in line with the environmental, economic and social aspects set out in the UN Sustainable Development Goals. It reports to the CSO and supports the operational implementation of the sustainability strategy.

Group Risk Oversight Committee

The Risk Oversight Committee reviews sustainability-related risks, taking account of any changes in legislation, and closely cooperates with the Risk department. It provides an annual update on the risk situation.

Information provided to and sustainability matters addressed by the Company's administrative, management and supervisory bodies (GOV-2)

The Sustainability Council, the Group Executive Committee, the Supervisory Board and the Audit Committee of the Supervisory Board deal with sustainability aspects at regular meetings. The CSO provides a monthly update on material impacts, risks and opportunities, the implementation of due diligence in sustainability and the results and effectiveness of management approaches, actions, metrics and targets adopted to address them to the Executive Board, with regular updates submitted to the Supervisory Board. Moreover, the Executive Board is regularly updated about the key sustainability risks in the framework of the Group's risk management process in order to be able to oversee the Company's strategy and its decisions on major transactions. The Risk Oversight Committee (ROC) reviews and assesses the impacts, opportunities and risks arising within the Group and reports all material developments and changes to the Executive Board.

TUI's corporate strategy and risk mitigation measures are aligned to the material impacts, risks and opportunities identified, as outlined in the relevant management approaches. Where relevant, trade-offs with other corporate decisions are taken into account. All material impacts, risks and opportunities were presented to the Audit Committee of the Supervisory Board.

Integration of sustainability-related performance in incentive schemes (GOV-3)

TUI Group's remuneration systems are based in particular on the recommendations of the German Corporate Governance Code (GCGC) and the requirements of the German Stock Corporation Act. The remuneration of the Executive Board comprises a long-term (long-term incentive, LTI) and a short-term (short-term incentive, STI) remuneration component.

Progress delivered towards certain sustainability targets is included in the STI as an ESG factor. A deliberate choice was made not to incorporate an ESG component in the LTI. Integrating an ESG factor in the STI facilitates tracking annual progress towards the strategic milestone plan, which simplifies target-setting and reduces the complexity of the system.

The ESG factor consists of three equally weighted sub-targets set by the Supervisory Board for the relevant financial year as Environmental (e.g. reduction of CO₂ emissions), Social (e.g. employee satisfaction) and / or Governance (e.g. promotion of compliance/integrity) targets. As a result, sustainability-related metrics are included in the general remuneration systems.

The following three sustainability-related targets were included in the ESG factor for financial year 2025:

- Delivering reductions in CO₂ emissions of the airline, hotels and cruises based on the targets of TUI's Sustainability Agenda 2030
- Increasing customer satisfaction
- Increasing employee satisfaction

At financial year-end, the Supervisory Board carries out an evaluation of target achievement and determines a multiplier between 0.8 and 1.2 as the ESG factor. In financial year 2025, the Supervisory Board determined an ESG factor of 1.1 for the active members of TUI AG's Executive Board based on target achievement in all three sub-areas. In financial year 2025, the proportion of the Executive Board's variable remuneration linked to sustainability-related targets ranges between 9.1% and 10%.

For further details on the remuneration system, please refer to the [Remuneration report](#).

In the framework of short-term variable remuneration (STI), the Net Promoter Score reflects the increase in customer satisfaction, as outlined in the chapter on Consumers and end-users. Employee satisfaction is reflected in the metric used in the Engagement Index of the annual Employee Survey, as outlined in the chapter on Own workforce.

The metrics relating to reductions in the CO₂ emissions of TUI Airline include Scope 1 and 3, category 3 emissions. For TUI Hotels & Resorts Scope 1 and 2 emissions are considered. They are in line with the targets outlined in E1-4, described in the chapter on Climate Change (E1).

For further details, please refer to the section [Climate change \(E1\)](#).

As the STI programme uses a multiplier, the proportion of variable remuneration and total remuneration dependent on sustainability-related targets and metrics cannot be expressed in one fixed percentage but can only be calculated for the respective year in which the STI is paid.

The terms of incentive schemes for the Executive Board are approved and updated by the Supervisory Board. The Supervisory Board conducted the annual review of the appropriateness of the Executive Board remuneration.

Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3 E1)

The sub-target for greenhouse gas emission reductions relevant to remuneration is aligned with the targets reported in the chapter Climate Change (E1). Due to the inclusion of a multiplier in the remuneration system, the percentage of acknowledged Executive Board remuneration dependent on climate-related considerations ranges between 1.3% and 1.9%, depending on the total remuneration granted and owed for financial year 2025.

For further details, please refer to the Remuneration report, [II.3 Remuneration granted and owed within the meaning of section 162 \(1\) sentence 1 AktG in financial year 2025](#).

Statement on due diligence (GOV-4)

The section below explains how the main features and stages of the due diligence process, as described in ESRS 1, Section 4, are incorporated into this non-financial declaration.

Main features and stages of the due diligence process

Main features of the due diligence process	Reference
a) Integration on due diligence into governance, strategy and business model	ESRS 2, SBM-1, SBM-2, SBM-3 and the management approaches outlined in the topic-related chapters
b) Integration of stakeholders in all elements of due diligence	ESRS 2, SBM-2 and the relevant chapters S1, S2 and S4
c) Determination and assessment of negative impacts	ESRS 2, IRO-1: Corresponding disclosures on management approaches outlined in the topic-related chapters
d) Measures taken to manage negative impacts	Details in particular in each topic-related chapter
e) Tracking the effectiveness of these efforts and communication	Details on targets and target supervision in each topic-related chapter

Risk management and internal control system in relation to the sustainability reporting process (GOV-5)

Binding sustainability reporting at TUI follows an established procedure under which various functions, in particular Group Sustainability and Group Human Resources, have prepared the annual non-financial declaration under the aegis of Group Financial Accounting & Reporting to date.

We are aware that the inherent risk of error has increased due to the novelty and dynamism of the regulations and the resulting ambiguities in the interpretation of the rules, as well as the new data points to be collected. In response to this, during implementation we focused risk management primarily on materiality assessment, data availability and appropriate reporting. As there was little experience in the market with the extensive new reporting requirements, especially at the start of the project, we regularly sought support from external consultants for assurance purposes.

A key aspect of risk mitigation was the preparation of a draft report at an early stage between March and May 2025. This enabled us to derive a number of focus points to ensure ESRS-compliant reporting as per 30 September 2025, at the end of the financial year under review. In drafting the report itself, we also observed the market and drew conclusions regarding the content and granularity of our own reporting. We provide information on the integration of sustainability risks into the Group-wide risk management system under IRO-1.

The non-financial internal control system (n-ICS) is less formalised. For the first-time preparation of the CSRD report, we mapped and documented the existing control system. The goal is to integrate the core controls identified into the existing minimum control system for financial reporting. The focus is on quantitative data points, as qualitative information is quality-assured within the framework of several reporting loops.

The core n-ICS framework consists of the electronic reporting systems for E- and S-related data. These are subject to the regulatory framework governing general Group-wide IT controls, such as access controls, functional separation, processing controls, protections against intentional and unintentional falsification of data and documents, and controls relating to service provider management.

Group Audit played an advisory role in establishing and developing the n-ICS and contributed to the framework by auditing the reporting systems and the determination of specific metrics. n-ICS development going forward will focus on the formalisation of data collection and reporting processes for the quantitative data points.

This established governance system was used to prepare for the extended sustainability reporting requirements. The progress delivered in the project and the next steps were discussed at monthly management meetings involving the relevant divisional heads. Ultimate responsibility lies with the CFO, who was kept regularly updated.

Progress reports were presented to the Audit Committee at its meetings in November 2024, May 2025 and, after the end of the financial year, in November 2025.

Strategy

Business model and value chain (SBM-1)

> For data point ESRS 2 SBM-1 40 a) i/ii, please refer to the section on [TUI Group reporting structure](#) in Corporate profile and the chapter TUI Group strategy

For data point ESRS 2 SBM-1 40 a) iii Geographical breakdown of the workforce, please refer to the standard Own workforce (S1), table [Breakdown of employees by country](#)

TUI offers the services outlined in the section on Corporate Profile for millions of customers across the entire customer journey. The service portfolio covers the entire range of tourism offerings, i.e. package holidays, components, hotels, flights, tours, experiences and car rental. We strive to live up to our claim "Excellence in Leisure Experiences" at every point of contact with our guests, in both the physical and the digital world.

In order to secure business operations across the entire customer journey, TUI depends on cooperation with suppliers from different sectors, mainly supplying:

- Hotels and Resorts: land, buildings, power, water, food and beverages as well as other materials and products required for hotel operation and facilities
- Cruises: ships, fuel, food and beverages as well as other materials and products required to operate and equip cruise liners
- TUI Musement: vehicles, equipment, fuel, buildings, excursions and experience offerings, tour reps and other inputs from various suppliers
- Markets + Airline: aircraft, fuel, food and beverages as well as other materials and products required to operate and equip aircraft
- All other Segments: power, buildings, water, technical equipment, office facilities

We work with a wide range of business partners to create TUI Group's products and services. Inputs are sourced from a global supplier base, and TUI also works directly and indirectly with a wide range of business partners in the downstream value chain. Key suppliers include the manufacturers and suppliers of the above-mentioned inputs. In addition, TUI depends on cooperation and agreements with governments, authorities, trade unions and other stakeholders such as civil

aviation, maritime, environmental, health and safety authorities, industry associations and other parties. Depending on the availability, quality and price of raw materials, TUI Group sources these from various regions and countries.

The Group offers its products and services to many different customers and intermediaries, including holidaymakers, cruise passengers, hotel guests, customers looking for local experiences, tour operators, travel agencies and online platforms. Distribution is carried out through direct marketing as well as B2C and B2B channels. Downstream, TUI works in particular with waste management companies in operating its own hotels, cruise ships and hotels, and with other providers of tourism services.

TUI Sustainability Agenda and TUI People Strategy (SBM-1)

TUI Group's Sustainability Agenda, published in financial year 2023, remained in force in financial year 2025.

TUI's ambition is to play an active role in shaping a more sustainable future for tourism across all three dimensions of sustainability – social, environmental and economic. We use our scale and influence for the sustainable transformation of the tourism industry. We understand sustainable transformation as an opportunity.

Our Agenda is founded on three priorities: We aim to empower people in the destinations and TUI employees to drive the sustainable transformation actively (People). We aim to reduce TUI's ecological footprint (Planet). We aim to partner with others to launch initiatives for the sustainable transformation of our sector (Progress). Our three P's – People, Planet and Progress – are supported by 15 focus areas with key goals, objectives and initiatives. Our Sustainability Agenda seeks to address the major challenges we will face in the coming decades, in particular climate change.

Our Sustainability Agenda supports the United Nations' Sustainable Development Goals (SDGs) – 17 global goals to fight inequality, end poverty and protect our planet by 2030 – and defines appropriate measures to contribute to their achievement. The tourism value chain is closely linked with many different sectors. This enables us to influence progress on many SDGs, with a particular focus on 13 of these goals.

Apart from the Sustainability Agenda, TUI pursues its People Strategy to create a framework enabling employees to deliver their best performance and work successfully as a team. Our vision is to be digital, engaging and inclusive.

Digital: We use digital tools to ease the workload for our employees, promote innovation and enhance efficiency.

Engaged: We invest in the development of our employees and empower our leaders.

Inclusive: We acknowledge difference and bring global and local teams together.

We have adopted a mission defining our relevant areas of action in order to implement our strategy. This creates a framework enabling our employees to deliver their best performance and be successful as a team.

The material impacts, risks and opportunities are reflected in TUI's Sustainability Agenda, People Strategy and business model. The relevant elements of the strategy comprise, in particular, the goals of the management approaches outlined in the respective topic-related chapters. Wherever appropriate, the key challenges facing TUI are included in the detailed descriptions of impacts, risks and opportunities. Critical solutions and projects are addressed through management approaches, specific metrics, targets or core measures.

Our targets include, in particular, science-based emissions reduction targets, which have been outlined in detail in the present report. Additional targets have been established for other aspects of TUI's Sustainability Agenda.

For further details on TUI's Sustainability Agenda and its targets, please refer to the section [Climate change \(E1\)](#).

For further details on the People Strategy and its targets, please refer to the section [Own workforce \(S1\)](#).

TUI's key services in relation to our sustainability targets are our flight, cruise and hotel offerings, for which we have established science-based targets to reduce emissions in the framework of our Sustainability Agenda.

Interests and views of stakeholders (SBM-2)

TUI engages in regular dialogue with stakeholders through various formats. TUI's key stakeholders include:

- Employees and employee representatives
- Guests and customers
- Business partners
- Capital market participants (investors, banks)
- Political decision-makers
- Communities affected and civil society
- Nature, as a silent stakeholder (indirectly)
- Users of sustainability statements

Our stakeholder dialogue takes place, above all, in the following formats:

- Employees and employee representatives: various formats including employee meetings, the TUI Europa Forum, employee surveys, the intranet and various online formats, town hall meetings, meetings with employee representatives and other internal events
- Customers and guests: various formats including TUI's customer service, the TUI app, travel agencies, local employees and social media channels
- Business partners: various formats including sales departments, purchasing departments and key account management
- Investors and capital market participants: various formats including the Annual General Meeting, investor conferences, analyst meetings, one-on-one meetings and Capital Markets Day
- Public decision-makers: various formats including public affairs departments
- Communities and civil society: various formats including surveys, trade fairs, engagement projects

In addition, the SpeakUp Line, TUI's whistleblower system, is available to all stakeholders.

The dialogue formats differ, depending on the relevant stakeholder group, and are organised by the relevant internal departments to reflect the specific purpose.

The purpose of our stakeholder engagement is to understand different perspectives, discuss potential mutual effects and learn from one another. Dialogue with customers and guests, in particular, is essential for TUI Group's business success as it enables us to live up to our claim at every point of contact with our guests, in both the physical and the digital world. Our business success and continued operation also hinge on dialogue with banks, investors, shareholders, journalists and politicians in order to secure TUI's market presence and stable financial position.

The outcomes gleaned from our various formats of stakeholder engagement are regularly integrated into the development and management of our business activities. In particular, this feedback from stakeholder engagement is taken into account in decision-making based on the management approaches outlined in the relevant chapters.

The stakeholders' perspectives were fed into the materiality assessment by internal representatives (please refer to IRO-1) operating with the stakeholders in their work environment. TUI takes account of stakeholder perspectives when implementing the management approaches and actions outlined in the relevant chapters.

Interests and views of TUI's own workforce

The interests, views and rights of employees, including respect for their human rights, are an essential element in shaping TUI's People Strategy and business model. To ensure that their perspectives are considered in decision-making processes, TUI engages in regular dialogue with its employees and their representatives in different formats, including employee meetings and employee surveys.

Interests and views of employees along the value chain

TUI takes account of the interests, views and rights of employees in the value chain through structured risk analyses that identify risks relating to human rights and the environment. A Supplier Code of Conduct ensures that business partners comply with fundamental requirements relating to human rights, working conditions and environmental protection. The TUI SpeakUp Line enables employees to report any concerns anonymously. Moreover, TUI engages in multi-stakeholder initiatives in order to incorporate stakeholder perspectives when updating measures.

Interests and views of consumers and end-users

The interests, views and rights of customers and guests travelling with TUI, including respect for their human rights, are an essential element in shaping TUI's Sustainability Agenda and business model. To ensure that their perspectives are taken into account in decision-making processes, TUI engages in regular dialogue with customers and guests through various formats including personal exchange and satisfaction surveys.

The Supervisory Board, the Executive Board and the Group Executive Committee are briefed at regular meetings by members of the Executive Board, the CSO or other Group or company directors about the views and interests of stakeholders in relation to sustainability-related impacts. The reporting lines follow the established governance system.

Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)

TUI has identified and assessed actual and potential negative and positive material impacts, risks and opportunities. These IROs are presented in a table at the start of each of the thematic chapters E1 Climate Change, S1 Own Workforce, S2 Workers in the Value Chain, S4 Consumers and End-Users and G1 Business Conduct, in the section Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 – SBM-3) and are subsequently outlined in detail. Specific financial impacts of the key risks and opportunities on TUI Group's financial position result in particular from regulatory measures such as the EU Emissions Trading System (EU ETS). The expansion of the scope of the EU ETS to cover aviation has caused additional costs to obtain emissions certificates, directly impacting the operating result. Moreover, operating state-of-the-art low-emission aircraft types such as Boeing 737 Max requires substantial investments, which are reflected in the Company's financial position and underline its strategic alignment to long-term greenhouse gas emissions reductions. The actions initiated serve to reach the climate-related targets in accordance with the Science Based Targets Initiative (SBTi) by 2030. Due to its strategic emissions reduction and reflecting measures, TUI Group is resilient and well prepared for regulatory and physical climate risks. While the short-term impacts on its financial planning are immaterial, TUI Group continually monitors and assesses the medium- to long-term uncertainties.

Management of impacts, risks and opportunities

Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

For financial year 2025, TUI Group conducted a double materiality assessment (DMA) in accordance with ESRS 1. The DMA identified and evaluated sustainability-related impacts, risks and opportunities for TUI Group. It incorporated the expertise of various departments, experts and the management of TUI Group. TUI Group conducted the DMA according to the procedure outlined below.

Object of the DMA

To establish a basis for the DMA, activities, agents and relationships were analysed across TUI Group's entire value chain. The value chain was examined for impacts, risks and opportunities with regard to all sustainability aspects deriving from ESRS 1, AR 16.

[For a description of the value chain, please refer to the section ESRS 2 Business model and value chain \(SBM-1\) and the section Corporate profile.](#)

The representatives of the segments, experts and managers included in the assessment were either stakeholders directly or indirectly affected by TUI Group's value chain or users of the non-financial declaration.

[For a description of the stakeholders, please refer to the section Interests and views of stakeholders \(SBM-2\).](#)

To appropriately prioritise relevant activities within its business operations and value chain when identifying impacts, risks and opportunities, TUI Group drew on insights derived from earlier assessments and the design of its business model. This methodology facilitates a sound and strategic assessment, taking account of both operational and long-term perspectives.

As a tourism group, TUI Group focuses its assessment above all on three key areas considered to be particularly critical because of their relevance and their impact on sustainability and business risks:

- The focus of the assessment is on emissions, as the Airline plays a key role in driving the Group's CO₂ emissions and therefore constitutes a central springboard for measures aiming to promote climate change mitigation and reduce environmental pollution.

- Service orientation and customer focus play a key role in TUI Group's business model. As it is a global tourism player, TUI Group's employees interact with many customers across different regions. Understanding the social impacts, including on diversity, working conditions, employee satisfaction and customer satisfaction, is essential to preserve the corporate image and ensure long-term stakeholder retention.
- As the business activities are globally aligned, a robust governance structure has to be in place. The focus is primarily on transparency, ethics and compliance with international standards in order to minimise risks and ensure stakeholder trust.

By prioritising the above areas, TUI Group focused its double materiality assessment on aspects of key relevance both for sustainability reporting and for the Group's strategic direction.

Identifying and assessing impacts, risks and opportunities

TUI Group carried out the materiality assessment in a two-step process, integrating both operational and strategic perspectives:

IDENTIFICATION AND ASSESSMENT BY TECHNICAL EXPERTS

In a first step, technical and segment experts from different parts of the organisation identified relevant IROs in the Group's own activities and along its value chain. The assessment was based on defined criteria, including scale, likelihood, relevance for stakeholders as well as any potential dependencies of individual topics. Determination of these dependencies was preceded by an analysis of risks or opportunities potentially generated by impacts or dependencies. The perspectives of external stakeholders were indirectly taken into account through the internal representatives involved in the assessment. There were no direct consultations.

VALIDATION, AGGREGATION AND FOCUS

The comprehensive results of the technical examination were subsequently reviewed by management. The aim of this step was to validate the identified IROs, cluster them by topic and focus on their strategic relevance for the Group as a whole. In the process, a number of topics initially assessed as material were deemed immaterial in the Group context and were therefore not included in the final materiality evaluation. This focus ensures that non-financial reporting is aligned with major and relevant sustainability issues.

The consolidated results of the materiality assessment were presented to the Executive Board and the Supervisory Board and form the basis for selecting the contents to be reported in the Group's non-financial declaration.

ASSESSMENT CRITERIA

Positive impacts were assessed according to their scale and scope. Negative impacts were additionally assessed according to their remediability. For potential impacts, likelihood was also considered. All criteria were assessed on a scale from 1 to 5. The likelihood criterion is based on TUI Group's risk management system.

In the case of potential impacts on human rights, the severity of the impact takes precedence over likelihood, which means that it is treated as an actual impact regardless of the likelihood of the event.

A materiality score was calculated on the basis of the criteria applied. The score was calculated as the sum of the scale, scope and remediability values (negative impacts), multiplied by the likelihood (for potential impacts). The score ranges from 0 to 15. Impacts scored at 8 or more are considered to be material for the non-financial declaration.

Sustainability risks are not prioritised over other business risks. All risks and opportunities were assessed in accordance with their scale and likelihood and multiplied to calculate the materiality score, resulting in a score between 1 and 4. Risks and opportunities scored at 3 or more are considered to be material for the non-financial declaration. The threshold values from the general risk management system were used for reference purposes.

The integration of the identified material risks into the Group-wide risk management system has not yet been completed. Responsibility for managing impacts, risks and opportunities lies with the relevant business areas.

For further information on risk governance, please refer to the [Risk report](#).

As a component of this non-financial declaration, the materiality assessment is integrated into internal controls and decision-making processes. Ultimate responsibility lies with the Executive Board of TUI Group. The double materiality assessment is reviewed on an annual basis. The next review will take place in financial year 2026.

Materiality assessment in relation to climate change (E1)

As part of its materiality assessment, TUI identified and assessed the environmental impact of TUI Group and its upstream and downstream value chain. The assessment followed the methodology described above and was based on reported greenhouse gas emissions (Scopes 1, 2 and 3).

TUI also conducted a qualitative and quantitative climate scenario assessment in financial year 2023 to gain a better understanding of the potential business risks and opportunities related to climate change and to review its strategy and financial planning in order to enhance resilience. The results of that assessment are validated annually and continue to apply to TUI Group. The assessment identified short-, medium-, and long-term climate-related risks and opportunities. TUI defines “short-term” as the period up to 2030 (aligned with its science-based targets), “medium-term” as the period up to 2040, and “long-term” as the period up to 2050 (the date by which TUI aims to achieve net-zero emissions across its entire business operations and supply chain). This assessment is based on a number of assumptions relating, for example, to changes in the intensity and frequency of weather-related events, technological developments, energy and carbon price trends and the evolution of knowledge about global warming.

The determination of climate-related physical risks was based on the effects of climate change, including event-driven acute change such as storms, fire and flooding and long-term chronic change such as rising temperature.

A high-emission scenario was examined to assess the impacts of significant changes in the physical climate, based on Representative Concentration Pathway 8.5 (IPCC RCP 8.5) as set out by the Intergovernmental Panel on Climate Change (IPCC) and the Stated Policy Scenario of the International Energy Agency (IEA), which assumes global warming of around 4.3 °C by 2100.

The assessment took into account the assets and business activities of TUI Group subject to risks and evaluated their sensitivity and exposure to gross physical risks.

Climate-related transition risks were determined by taking into account the socio-economic consequences of climate change in connection with the transition to a low-carbon economy, including political, legal, technological and market-related risks.

This assessment was founded on a low-emission scenario to assess the impact of significant socio-economic changes required to achieve a low-carbon economy, drawing on IPCC RCP 2.6 and the IEA's Net Zero Scenario, which envisages global warming of approximately 1.5 °C by 2100.

The assessment took account of all assets and business activities subject to risks of TUI Group, evaluating their sensitivity and exposure to transition risks and opportunities.

TUI's climate-related risk assessment and the above-mentioned scenarios underlying it took account of the following key drivers, as these have direct impacts on operating costs, investment decisions and strategic direction:

- Political and regulatory developments: Introduction and expansion of CO₂ pricing mechanisms and new energy and emissions targets for energy-intensive industries.
- Macroeconomic trends: Assumptions about global growth, energy consumption and emission pathways.
- Technological developments: Availability and costs of alternative fuels (e.g. SAF, green methanol) and technologies (e.g. dual-fuel engines).
- CO₂ price forecasts: Based on IPCC SSPs (Shared Socioeconomic Pathways) and NGFS (Network for Greening the Financial Systems) models.
- The scenario analysis is based on modelled assumptions and external data sources and is inherently subject to uncertainty. In particular, the following limitations apply.
- Future-related uncertainties: The analysis is not a forecast but a model-based assessment of potential developments.
- Model limitations: The tools used to quantify risk are based on simplified assumptions and have limited depth of detail and auditability.
- Data availability: Location data (geographic coordinates) for hotels, airports and cruise itineraries were used where available. Where data was lacking, the nearest airports were used.
- Scope limitations: Individual business areas and emission sources were excluded if no significant climate-related risks or opportunities were identified.

Materiality assessment in relation to pollution (E2)

The materiality assessment in relation to pollution was based on the assessments of experts from segments, specialist fields and management. The assessment prioritised the TUI Airline, Cruises and Hotels & Resorts segments and their respective value chains, as they entail greater potential environmental impacts and risks than other business activities. A location analysis was not performed.

Materiality assessment in relation to water and marine resources (E3)

The materiality assessment in relation to water and marine resources was based on the assessments of experts from segments, specialist fields and management. Consultations with affected communities were not conducted. A location analysis was not performed.

Materiality assessment in relation to biodiversity and ecosystems (E4)

The materiality assessment in relation to biodiversity was based on assessments of experts from segments, specialist departments and management. It examined the entire value chain, including all ecosystem services, to assess environmental impacts, transition risks and physical and systemic risks potentially arising from dependencies. In addition, a location analysis was carried out on the basis of geographic data using the Integrated Biodiversity Assessment Tool (IBAT).

The experts examined whether any of the Company's sites are located in or close to areas of relevance to biodiversity and whether any of the associated activities cause any degradation of natural habitats or disturbance of species for which protected areas have been designated. The assessments show that TUI, as a tourism group, operates hotels in the vicinity of biodiversity-sensitive areas. TUI Hotels in the vicinity of biodiversity-sensitive areas are characterised by a compact footprint, structured operational practices and integration into existing infrastructure. Compared with other commercial usage, the impact on biodiversity is immaterial and easily controllable. No significant impacts, risks or opportunities have been identified.

Materiality assessment in relation to resource use and circular economy (E5)

The materiality assessment in relation to resource use and the circular economy was based on the assessments of experts from segments, specialist fields and management. No further analyses or consultations with affected communities or location assessments were conducted.

Materiality assessment in relation to business conduct (G1)

The materiality assessment in relation to business conduct was based on the assessments of experts from segments, specialist fields and management. The focus was, in particular, on Group-level governance structures, business activities in the segments, global supply chains and business processes.

Disclosure requirements included in ESRS and covered by TUI Group's non-financial declaration (IRO-2)

Index: List of disclosures provided in line with disclosure requirements

Disclosure requirement	Chapter	Fulfilment ¹
ESRS 2 General requirements		
BP-1 – General basis for preparation of the sustainability statement	ESRS 2: General basis for preparation of the non-financial declaration (BP-1)	f
BP-2 – Disclosures in relation to specific circumstances	ESRS 2: Disclosures in relation to specific circumstances (BP-2)	f
GOV-1 – The role of administrative, management and supervisory bodies	ESRS 2: The role of the administrative, management and supervisory bodies (GOV-1)	f
GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	ESRS 2: Information provided to and sustainability matters addressed by the Company's administrative, management and supervisory bodies (GOV-2)	f
GOV-3 – Integration of sustainability-related performance in incentive schemes	ESRS 2: Integration of sustainability-related performance in incentive schemes (GOV-3)	f
GOV-4 – Statement on due diligence	ESRS 2: Statement on due diligence (GOV-4)	f
GOV-5 – Risk management and internal controls over sustainability reporting	ESRS 2: Risk management and internal control system in relation to the sustainability reporting process (GOV-5)	f
SBM-1 – Strategy, business model and value chain	ESRS 2: Business model and value chain (SBM-1), TUI Sustainability Agenda and TUI People Strategy (SBM-1)	f
SBM-2 – Interests and views of stakeholders	ESRS 2: Interests and views of stakeholders (SBM-2)	f

Index: List of disclosures provided in line with disclosure requirements

Disclosure requirement	Chapter	Fulfilment ¹
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2: Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)	f
IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	ESRS 2: Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)	f
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	ESRS 2: Disclosure requirements included in ESRS and covered by TUI Group's non-financial declaration (IRO-2)	f
ESRS E1 – Climate change		f
GOV-3 – Integration of sustainability-related performance in incentive schemes	ESRS 2: Integration of sustainability-related performance in incentive schemes (GOV-3)	f
E1-1 – Transition plan for climate change mitigation	E1: TUI Group decarbonisation roadmap (ESRS E1-1)	f
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	E1: Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2 SBM-3)	f
IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Management of impacts, risks and opportunities	f
E1-2 – Policies related to climate change mitigation and adaptation	E1: Management approach (ESRS E1-2) Management of the impacts from CO ₂ e emissions from own operations and the value chain; Management of risks from impacts of climate change and climate change adaptation	f
E1-3 – Actions and resources in relation to climate change policies	E1: Actions (ESRS E1-3) TUI Airline; Cruises; Hotels & Resorts; TUI Musement	f
E1-4 – Targets related to climate change mitigation and adaptation	E1: Targets (ESRS E1-4) TUI Airline; Cruises; Hotels & Resorts;	f
E1-5 – Energy consumption and mix	E1: Metrics: Energy (ESRS E1-5)	f
E1-6 – Gross Scopes 1, 2 3 and Total GHG emissions	E1: Metrics: GHG emissions (ESRS E1-6)	f
ESRS E2 - Pollution		
IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Management of impacts, risks and opportunities	f
ESRS E3 - Water and marine resources		
IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Management of impacts, risks and opportunities	f
ESRS E4 - Biodiversity and ecosystems		
IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Management of impacts, risks and opportunities	f
ESRS E5 - Ressource use and circular economy		
IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Management of impacts, risks and opportunities	f
ESRS S1 – Own workforce		
SBM-2 – Interests and views of stakeholders	S1: Processes for engaging with own workforce and workers' representatives	f
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	S1: General disclosures related to TUI's own workforce (ESRS 2 SBM-3); S1: Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)	f
S1-1 – Policies related to own workforce	S1: TUI People Strategy (ESRS S1-1), Human rights commitments of TUI Group (ESRS S1-1)	f
S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	S1: Processes for engaging with own workforce and workers' representatives (ESRS S1-3)	f
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	S1: Processes to remediate negative impacts and channels for own workforce to raise concerns	f
S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1: Additional disclosure on managing impacts, risks and opportunities	f
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1: Additional disclosures on managing impacts, risks and opportunities	f
S1-6 – Characteristics of the undertaking's employees	S1: Characteristics of employees (ESRS S1-6)	f

Index: List of disclosures provided in line with disclosure requirements

Disclosure requirement	Chapter	Fulfilment ¹
S1-9 – Diversity	S1: Diversity, Equity & Inclusion	p (metrics)
S1-12 – Employment and inclusion of persons with disabilities	S1: Diversity, Equity & Inclusion	f
S1-10 – Adequate wages	S1: Enable Growth	p (metrics)
S1-13 – Training and skills development	S1: Enable best performance	f
S1-15 – Work-life balance	S1: Positive Employee Experience	f
S1-16 – Gender equality and equal pay for work of equal value (pay gap and total remuneration)	S1: Diversity, Equity & Inclusion	p (metrics)
S1-17 – Incidents, complaints and severe human rights impacts	S1: Incidents, complaints and severe human rights impacts (ESRS S1-17)	p (metrics)
ESRS S2 – Workers in the value chain		
SBM-2 – Interests and views of stakeholders	ESRS 2: Interests and views of stakeholders (SBM-2)	f
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2, SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	f
S2-1 – Policies related to value chain workers	S2: Managing impacts, risks and opportunities (S2-1)	f
S2-2 – Processes for engaging with value chain workers about impacts	S2: Processes for engaging with value chain workers about impacts (S2-2)	f
S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	S2: Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)	f
S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	S2: Taking action on material impacts on value chain workers (S2-4)	f
S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S2: Targets related to value chain workers (S2-5)	f
ESRS S4 – Consumers and end-users		
SBM-2 – Interests and views of stakeholders	S4: Management approach related to personal safety and security/Stakeholder interests; Management approach related to health and safety / Stakeholder interests	f
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	S4: Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)	f
S4-1 – Policies related to consumers and end-users	S4: Policies consumers and end-users (S4-1)	f
S4-2 – Processes for engaging with consumers and end-users about impacts	S4: Processes for engaging with consumers and end-users about impacts (S4-2)	f
S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	S4: Channels available to consumers and end-users to raise concerns (S4-3)	f
S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	S4: Actions on material impacts on consumers and end-users (S4-4); Managing impacts, risks and opportunities	f
S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S4: Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities (S4-5)	f
ESRS G1 – Business conduct		
GOV-1 The role of the administrative, management and supervisory bodies	ESRS 2: The role of the administrative, management and supervisory bodies (GOV-1)	f
IRO-1 Strategy in relation to business conduct policies and corporate culture	ESRS 2: Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)	f
G1-1 – Business conduct policies and corporate culture	G1: Management approach 1: Strategies in relation to business conduct policies and corporate culture (IRO-1)	f
G1-3 – Prevention and detection of corruption and bribery	G1: Management approach 4: Prevention and detection of corruption and bribery (G1-3)	f
G1-4 – Incidents of corruption or bribery	G1: Management approach 4: Prevention and detection of corruption and bribery (G1-3)	f
G1-5 – Political influence and lobbying activities	G1: Management approach 3: Political influence and lobbying activities (G1-5)	f

Index: List of disclosures provided in line with disclosure requirements

Disclosure requirement	Chapter	Fulfilment ¹
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¹ f = fully applied; p = partly applied

Data points in general and topical standards derived from other EU legislation

The table below refers to data points derived from other EU legislation.

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
ESRS 2 GOV-1 Board gender diversity, paragraph 21 (d)	Indicator No. 13 in Annex 1 Table 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		ESRS 2 The role of the administrative, management and supervisory bodies (GOV-1)
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 e			Delegated Regulation (EU) 2020/1816, Annex II		ESRS 2 The role of the administrative, management and supervisory bodies (GOV-1)
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator No. 10 in Annex 1 Table 3				ESRS 2 Statement on due diligence (GOV-4)
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	Indicator No. 4 Table 1 in Annex 1	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on environmental risk, and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		not relevant
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator No. 9 in Annex 1 Table 2		Delegated Regulation (EU) 2020/1816, Annex II		not relevant
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Indicator No. 14 in Annex 1 Table 1		Delegated Regulation (EU) 2020/1816, Article 12 (1), Delegated Regulation (EU) 2020/1816, Annex II		not relevant
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12 (1), Delegated Regulation (EU) 2020/1816, Annex II		not relevant
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2 (1)	ESRS E1 TUI Group decarbonisation roadmap (ESRS E1-1)
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks, paragraph 16 (g)		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking	Delegated Regulation (EU) 2020/1818, Article 12 (1) d to g and Article 12 (2)		ESRS E1 TUI Group decarbonisation roadmap (ESRS E1-1)

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
		book – Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity			
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator No. 4 in Annex 1 Table 2	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Indicators of potential climate change transition risk: Alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		ESRS E1 Targets for TUI Airline, Cruises and Hotels & Resorts (ESRS E1-4)
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator No. 5 in Annex 1 Table 1 and Indicator No. 5 in Annex 1 Table 2				ESRS E1 Metrics: Energy (ESRS E1-5)
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator No. 5 in Annex 1 Table 1				ESRS E1 Metrics: Energy (ESRS E1-5)
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator No. 6 in Annex 1 Table 1				ESRS E1 Metrics: Energy (ESRS E1-5)
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators Nos. 1 and 2 in Annex 1 Table 1	Article 449a; Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5 (1), Article 6 and Article 8 (1)		ESRS E1 Metrics: GHG emissions (ESRS E1-6)
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator No. 3 in Annex 1 Table 1	Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Indicators of potential climate change transition risk: Alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8 (1)		ESRS E1 Metrics: GHG emissions (ESRS E1-6)
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2 (1)	not relevant
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		not relevant
ESRS E1-9 Disaggregation of monetary		Article 449a Regulation (EU) 575/2013;			not relevant

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
amounts by acute and chronic physical risk, paragraph 66 (a)		Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk			
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 c		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk			not relevant
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy efficiency classes, paragraph 67 c		Article 449a Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking book – Indicators of potential climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral			not relevant
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		not relevant
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRT (European Pollutant Release and Transfer Register) Regulation emitted to air, water and soil, paragraph 28	Indicator No. 8 in Annex 1 Table 1, Indicator No. 2 in Annex 1 Table 2, Indicator No. 1 in Annex 1 Table 2, Indicator No. 3 in Annex 1 Table 2				not material
ESRS E3-1 Water and marine resources, paragraph 9	Indicator No. 7 in Annex 1 Table 2				not material
ESRS E3-1 Dedicated policy, paragraph 13	Indicator No. 8 in Annex 1 Table 2				not material
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator No. 12 in Annex 1 Table 2				not material
ESRS E3-4 Total water recycled and reused, paragraph 28 c	Indicator No. 6.2 in Annex 1 Table 2				not material
ESRS E3-4 Total water consumption in m ³	Indicator No. 6.1 in Annex 1 Table 2				not material

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
per net revenue on own operations, paragraph 29					
ESRS 2- SBM3 – E4, paragraph 16 (a) i	Indicator No. 7 in Annex 1 Table 1				not material
ESRS 2- SBM3 – E4, paragraph 16 (b)	Indicator No. 10 in Annex 1 Table 2				not relevant
ESRS 2- SBM3 – E4, paragraph 16 (c)	Indicator No. 14 in Annex 1 Table 2				not relevant
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (b)	Indicator No. 11 in Annex 1 Table 2				not material
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 c	Indicator No. 12 in Annex 1 Table 2				not material
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator No. 15 in Annex 1 Table 2				not material
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator No. 13 in Annex 1 Table 2				not material
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator No. 9 in Annex 1 Table 1				not material
ESRS 2 SBM3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator No. 13 in Annex I Table 3				not material
ESRS 2 SBM3 – S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator No. 12 in Annex I Table 3				not material
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator No. 9 in Annex I Table 3 and Indicator No. 11 in Annex I Table 1				S1 Human rights obligations of TUI Group (ESRS S1-1)
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		not material
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator No. 11 in Annex I Table 3				S1 Human rights obligations of TUI Group (ESRS S1-1)
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator No. 1 in Annex I Table 3				not material
ESRS S1-3 Grievance / complaints handling mechanisms, paragraph 32 c	Indicator No. 5 in Annex I Table 3				S1 Processes to remediate negative impacts and channels for own workforce to raise concerns (ESRS S1-3)
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraphs 88 (b) and c	Indicator No. 2 in Annex I Table 3		Delegated Regulation (EU) 2020/1816, Annex II		not material
ESRS S1-14 Number of days lost to injuries,	Indicator No. 3 in Annex I Table 3				not material

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
accidents, fatalities or illness, paragraph 88 c					
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Indicator No. 12 in Annex I Table 1		Delegated Regulation (EU) 2020/1816, Annex II		S1 Remuneration metrics (Gender pay gap and total remuneration)
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator No. 8 in Annex I Table 3				S1 Remuneration metrics (Gender pay gap and total remuneration)
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator No. 7 in Annex I Table 3				S1 Incidents, complaints and severe human rights impacts (ESRS S1-17)
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 104 (a)	Indicator No. 10 in Annex I Table 1 and Indicator No. 14 in Annex I Table 3		Delegated Regulation (EU) 2020/1816, Annex II, Delegated Regulation (EU) 2020/1818, Article 12 (1)		S1 Processes to remediate negative impacts and channels for own workforce to raise concerns (ESRS S1-3)
ESRS 2 SBM3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators Nos. 12 and 13 in Annex I Table 3				ESRS 2 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator No. 9 in Annex 1 Table 3 and Indicator No. 11 in Annex 1 Table 1				S2 Management of impacts, risks and opportunities (S2-1)
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators Nos. 11 and 4 in Annex 1 Table 3				S2 Management of impacts, risks and opportunities (S2-1)
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 19	Indicator No. 10 in Annex 1 table 1		Delegated Regulation (EU) 2020/1816, Annex II, Delegated Regulation (EU) 2020/1818, Article 12 (1)		S2 Management of impacts, risks and opportunities (S2-1)
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator No. 14 in Annex 1 Table 3		Indicator No. 10 in Annex 1 Table 1		S2 Management of impacts, risks and opportunities (S2-1)
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator No. 14 in Annex 1 Table 3				S2 Taking action on material impacts on value chain workers (S2-4)
ESRS S3-1 Human rights policy commitments, paragraph 36	Indicator No. 9 in Annex 1 Table 3 and Indicator No. 11 in Annex 1 Table 1				not material
ESRS S3-1 Non-respect of UNGPs on	Indicator No. 10 in Annex 1 Table 1		Delegated Regulation		not material

Data points from other EU legislation

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Non-financial Group Declaration of TUI Group
Business and Human Rights, ILO principles or OECD guidelines, paragraph 17			(EU) 2020/1816, Annex II, Delegated Regulation (EU) 2020/1818, Article 12 (1)		
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator No. 14 in Annex 1 Table 3				not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator No. 9 in Annex 1 Table 3 and Indicator No. 11 in Annex 1 Table 1				S4 Policies consumers and end-users (S4-1)
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator No. 10 in Annex 1 Table 1		Delegated Regulation (EU) 2020/1816, Annex II, Delegated Regulation (EU) 2020/1818, Article 12 (1)		not material
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator No. 14 in Annex 1 Table 3				not material
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator No. 15 in Annex 1 Table 3				G1 Management approach 4: Preventing and detecting corruption and bribery (G1-3)
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Indicator No. 6 in Annex 1 Table 3				G1 Management approach 2: Whistle-blower protection
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator No. 17 in Annex 1 Table 3		Delegated Regulation (EU) 2020/1816, Annex II		G1 Management approach 4: Preventing and detecting corruption and bribery (G1-3)
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator No. 16 in Annex 1 Table 3				G1 Management approach 4: Preventing and detecting corruption and bribery (G1-3)

Environment

Climate Change (E1)

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2, SBM-3)

The table below provides an overview of the results of the double materiality assessment in relation to material impacts, risks and opportunities (IROs) for issues in connection with climate change mitigation and climate change.

E1 Climate change mitigation and adaption

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Climate change mitigation	Negative impact	Short-, medium- and long-term	Own operations	High CO ₂ e emissions result from operating passenger aircraft to the holiday destinations in TUI's own business operations and contribute to climate change. Energy consumption on the ground, for example at maintenance sites, can also indirectly result in emissions.

E1 Climate change mitigation and adaption

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Climate change mitigation	Negative impact	Short-, medium- and long-term	Own operations	High CO ₂ e emissions result from operating cruise ships in TUI's own business operations and those of its joint ventures, and contribute to climate change.
Climate change mitigation	Negative impact	Short-, medium- and long-term	Own operations	High CO ₂ e emissions result from operating hotels in TUI's own business operations and those of its joint ventures, indirectly driven by high energy consumption and the use of refrigerants, which contribute to climate change.
Climate change mitigation	Negative impact	Short-, medium- and long-term	Own operations	CO ₂ e emissions result from transporting clients in TUI's own business operations (via TUI Musement) and contribute to climate change.
Climate change mitigation	Negative impact	Short-, medium- and long-term	Upstream value chain	CO ₂ e emissions result from TUI's supply chain, from direct emissions and high energy consumption, for instance in producing assets or interim products, and contribute to climate change.
Climate change mitigation	Negative impact	Short-, medium- and long-term	Upstream and downstream value chain	CO ₂ e emissions result from TUI's supply chain, in particular in Hotels & Resorts and Cruises, from purchased products and materials in hotel operations as well as upstream or downstream processes (e.g. waste), and contribute to climate change.
Climate change	Risk	Long-term	Total value chain	TUI faces physical risks due to climate change-induced alterations in the weather, which may cause changes in people's travel behaviour. The risks include changes in rainfall and temperature in the destinations. They may impact TUI's core business as certain destinations might no longer be attractive destinations for holidaymakers.
Climate change	Risk	Medium- to long-term	Own operations	TUI faces transition risks due, for example, to increased insurance costs for certain assets (such as hotels), or rising operating costs for alternative fuels, CO ₂ prices, or other regulatory measures in TUI Airline or in Cruises. These risks may additionally include potentially higher investment costs for state-of-the-art low-emission or zero-emission technologies.
Climate change	Risk	Medium- to long-term	Own operations	TUI faces reputational risks arising in case of potential failure to achieve the defined decarbonisation targets because of insufficient financial resources or non-availability of alternative fuels or expected technical low-emission or zero-emission solutions.

Climate-related scenario analysis

TUI conducted a qualitative and quantitative climate scenario assessment in financial year 2023 to gain a better understanding of the potential impact of climate change on its business, review its strategy and financial planning and enhance resilience. The results of that assessment remain valid for TUI Group with unchanged business forecasts, regulatory requirements and up-to-date climate-related scenarios. They were therefore included in the double materiality assessment and assessed in accordance with the requirements.

The analysis included two climate-related scenarios: a high-emission scenario to assess the impacts of significant changes in the physical climate, based on Representative Concentration Pathway 8.5 (IPCC RCP 8.5) as set out by the Intergovernmental Panel on Climate Change (IPCC) and the Stated Policy Scenario of the International Energy Agency (IEA), which assumes global warming of around 4.3 °C by 2100, and a low-emission scenario to assess the impact of significant socio-economic changes required to achieve a low-carbon economy, drawing on IPCC RCP 2.6 and the IEA's Net Zero Scenario, which envisages global warming of approximately 1.5 °C by 2100. The scenarios are based on a number of assumptions relating, for example, to changes in the intensity and frequency of weather-related events, economic growth, technological developments and future energy and carbon prices.

The process began with a qualitative assessment of the risks and opportunities along TUI Group's value chain which had been identified in the different combinations of scenarios and time horizons in order to establish the climate-related risks and opportunities most relevant to TUI. Based on the findings of that qualitative assessment, various risks and opportunities were subsequently analysed in detail to gain a better understanding of the potential financial impact on TUI Group. TUI analysed short-term, medium-term and long-term climate-related risks and opportunities in its climate-related scenario analysis. TUI defines "short-term" as the period up to 2030 (aligned with its science-based targets), "medium-term" as the period up to 2040, and "long-term" as the period up to 2050 (the date by which TUI aims to achieve net zero emissions across its entire business operations and supply chain). For the double materiality

assessment, the findings of the more critical scenario in each instance were reanalysed based on the time horizons defined (short-term: less than one year, medium-term: one to five years, long-term: more than five years).

For details on the time horizons and methodology, please refer to the sections [General information according to ESRS 2](#) and [Description of the process used to determine and assess the material impacts, risks and opportunities \(IRO-1\)](#).

The quantitative climate-related scenario analysis took into account the expected financial effects of physical risks and transition risks as well as the climate change mitigation actions and measures described in the section on Actions. The assessment is based on a number of assumptions relating, for example, to changes in the intensity and frequency of climate-related events, technological developments, future energy and carbon prices, and advances in knowledge about global warming. For TUI Group, the consequences of both emission scenarios are variable. In a low-emission scenario, stricter emission and fuel efficiency targets set by TUI Group or by regulation could increase operating costs. In a high-emission scenario, physical risks from extreme weather events and natural disasters could affect TUI's tourist destinations. Rising operating costs due to stricter environmental regulations could affect profitability.

The results of the climate-related scenario analysis confirm the appropriateness of TUI Group's strategic initiatives and reduction paths described in the section on Actions in minimising the respective risks and tapping into opportunities. The impact on financial planning over the three-year observation period is considered immaterial, while potential medium- to long-term uncertainties are continuously monitored and assessed.

TUI is aware that the climate-related scenario analysis is based on a number of assumptions described above and that the uncertainties surrounding the consequences and the likelihood of certain impacts will increase in the medium to long term.

For further details on the impacts of climate-related risks on the useful lives and valuation of assets, please refer to the chapter on [Key judgments, assumptions and estimates](#) in the Notes to the Consolidated financial statements in the present Annual Report.

TUI Group decarbonisation roadmap (ESRS E1-1)

TUI Group's decarbonisation roadmap is derived from the science-based climate targets and underlying action plans aimed at reducing emissions for TUI Airline, Hotels & Resorts and Cruises, the most emission-intensive areas of the TUI Group. The greenhouse gas emission reduction target for TUI Hotels & Resorts is aligned to limiting global warming to 1.5 °C under the Paris Agreement. The targets for TUI Airline and Cruises are aligned to limiting global warming to well below 2 °C. All three targets have been validated by the Science-based Target Initiative (SBTi).

TUI's action plan for greenhouse gas emission reduction and target performance comprises the decarbonisation levers presented in the section Actions. For TUI Airline, TUI combines fuel efficiency and fleet modernisation measures as well as sustainable aviation fuels (SAF) in order to reduce emissions. The roadmap takes account of the emission output of current and planned aircraft by 2030. TUI has also developed an action plan for Cruises, which comprises the levers required to achieve SBTi's targets. The roadmap covers specific measures such as the use of shore power, energy efficiency enhancement, route optimisation and the use of lower-emission fuels. The action plan for TUI Hotels & Resorts comprises more extensive use of renewables, based on both sourcing activities and the expansion of on-site generation. In addition, energy efficiency enhancement measures are continually identified.

For more detailed information on the decarbonisation levers in the individual businesses, please refer to the sections on Climate change mitigation actions: TUI Airline, [Actions \(ESRS E1-3\)](#), Cruises, [Actions \(ESRS E1-3\)](#) and Hotels & Resorts, [Actions \(ESRS E1-3\)](#).

In exercising its business activities, TUI Group uses assets that potentially cause locked-in greenhouse gas emissions resulting from the tourism services. The most relevant assets in this context are aircraft and cruise ships. However, the actions mentioned above, such as fleet modernisation and the use of lower-emission fuels, help TUI achieve its targets and include the potentially negative effects of these locked-in emissions in the action plans for the business areas. Potential impacts on transitory climate risks, e.g. high CO₂ prices, are covered by the risk mitigation measures. TUI Group is not exempted from the EU Paris-aligned Benchmark.

Transitioning to net zero is the core ambition of TUI's Sustainability Agenda. Operational implementation of greenhouse gas emission reduction management activities is the responsibility of the individual business areas, with any investment required covered by the financial planning. The Agenda is managed by the Group Sustainability Officer and has been approved by the Group Executive Committee.

Progress towards the achievement of targets is presented for TUI Airline, [Targets \(ESRS E1-4\)](#), Cruises, [Targets \(ESRS E1-4\)](#) and Hotels & Resorts, [Targets \(ESRS E1-4\)](#).

For further details on the TUI Sustainability Agenda, please refer to the section on Strategy, [Business model and value chain \(SBM-1\)](#).

Management of the impacts from CO₂e emissions from own operations and the value chain

TUI Group's management approach addresses the following topics: climate change mitigation, climate change adaptation, energy efficiency and use of renewable energies and fuels.

Management approach (ESRS E1-2)

The *Planet* dimension of the TUI Sustainability Agenda reflects TUI's ambition to achieve net zero emissions in all business areas and in the supply chain by 2050. In support of that ambition, TUI has joined the SBTi and has committed to implementing emission reductions on the basis of globally acknowledged scientific climate-related findings.

TUI's Sustainability Agenda applies to TUI Group as a whole. The targets set in the *Planet* dimension focus, in particular, on TUI Airline, Cruises and Hotels & Resorts. TUI's Sustainability Agenda is managed by the Group Sustainability Officer and has been approved by the Group Executive Committee. The operational responsibility for managing reductions in carbon emissions lies with the individual business areas.

Within TUI's Sustainability Agenda and its *Planet* dimension, Science-based Targets (SBTs) and specific decarbonisation roadmaps aimed at significantly reducing emissions have been drawn up for the TUI Airline, Cruises and Hotels & Resorts. However, other business areas and segments such as TUI Musement, our offices and our purchasing departments are likewise committed to reducing emissions in pursuit of the Agenda. The targets relating to climate change mitigation are outlined in greater detail below.

The net zero ambitions of TUI's Sustainability Agenda and the activities launched to achieve the SBTs are specified in policies for operational activities in the individual business areas. For TUI Airline, these include the *Airline Environmental Policy* and a specific action plan for emission reductions aligned to the Science-based Target.

In Cruises, too, an action plan has been drawn up to achieve the emission reduction target validated by the Science-based Targets Initiative by 2030. The measures and investments in these action plans are based on planned budgets and CO₂e forecasts. Implementation of these measures is monitored by the project management teams.

A similar action plan to achieve the Science-Based Target has been drawn up for Hotels & Resorts. In addition, *Green Building Guidelines* have been published to provide Group-owned hotels and hotel partners with specific recommendations for construction and refurbishment projects. The aim is to reduce pollution and achieve water and energy savings. The Guideline also addresses topics such as monitoring systems, sustainability certification and stakeholder communication. In addition, there are specific policies for individual hotel brands, e.g. the *Riu Sustainability Policy*, the *TUI Blue Sustainability* approach and the *ROBINSON ROBsponsible Programme*. These policies set out the management approach to be adopted by hotels with regard to climate change mitigation, energy efficiency and other measures to prevent negative impacts on the environment.

In TUI Musement, the key policies relevant to climate change mitigation are the *Policy for More Sustainable Offices* and the *Policy for More Sustainable Mobility and Guest Transfers*. Both policies set out measures for reducing emissions, thereby contributing to the environmental goals of the business and the ambitions defined in TUI Group's Sustainability Agenda.

Moreover, the *People* dimension of the Sustainability Agenda with its focus on *Buy local* aims to establish a management approach that strengthens links with local suppliers and creates new income opportunities for the local community so that emissions in the upstream supply chain can be reduced. TUI is building a sustainable sourcing organisation and to that end has launched its *Policy for Diverse, Sustainable and Ethical Sourcing*. All procurement processes are subject to standards that play their part in day-to-day requirements and sourcing specifications. When purchasing or replacing goods or services, these specifications apply to such aspects as energy efficiency, use of renewable energies and fuel efficiency. Moreover, all suppliers are obliged by the Suppliers' Code of Conduct to minimise any adverse impacts on the environment.

The Sustainability Council receives regular reports from the managers and executives responsible for operations of key significance within TUI about the progress delivered in connection with the Sustainability Agenda. TUI's Sustainability Agenda supports the United Nations' Sustainable Development Goals (SDGs) – 17 global goals to fight inequality, end

poverty and protect our planet by 2030. The management approach for reducing greenhouse gas emissions addresses SDG 7 “Affordable and Clean Energy” and SDG 13 “Climate Action”.

TUI's Sustainability Agenda takes account of the interests of stakeholders around the world in climate change mitigation. Insights into the interests of our stakeholders help guide our strategy and actions, not least because they are reflected in our materiality assessment. We run national and international processes to engage in dialogue with our stakeholders in the destinations and with political decision-makers. We also engage with various stakeholder groups through our committees and the associations representing us.

The management approach and the resulting policies are communicated in-house by a number of decision-making bodies and reporting formats, e.g. via the Sustainability Council or the intranet. External stakeholders receive information about our management approach from our sustainability reporting, press releases, and customer and investor meetings.

TUI Airline

TARGET (ESRS E1-4)

Under TUI's Sustainability Agenda, the Group is targeting a 24% reduction in CO₂e emissions per revenue passenger kilometre from TUI Airline by 2030. In this way, TUI is helping to limit global warming to well below 2 °C, taking into account the climate scenarios of the applicable sectoral decarbonisation approach for airlines associated with the Science-based Targets Initiative (SBTi). This target is, accordingly, not compatible with the goal of 1.5 °C. TUI includes emissions from flights from all own-fleet flying operations as well as sub-charter operations within the target scope, including well-to-wake emissions for aircraft activities (emissions from aviation fuel, Scope 1 and Scope 3, Category 3). The SBTi target does not include Scope 1, 2 and 3 emissions from support services such as ground handling, engineering and maintenance, and onboard services. This area of application is derived from the SBTi methodology for aviation and therefore addresses the strongest CO₂e drivers in TUI Airline.

The following greenhouse gases associated with climate change are included: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). 82.7% of emissions are allocated to Scope 1 and 17.3% to Scope 3, Category 3. The intensity target also reflects future developments such as the expanding flight portfolio based on the Group's recent growth scenarios.

Science-based targets performance TUI Airline

		2025	Baseline 2019	Var. %	Target (2030) %
TUI Airline	g CO ₂ e/rpk	74.6	80.9	- 7.8	- 24.0

rpk = revenue passenger kilometer

A number of decarbonisation levers are being used to achieve the target. They include actions to enhance operational fuel efficiency, modernise the aircraft fleet and use sustainable aviation fuels. For a more detailed description, please refer to the section on Actions below.

ACTIONS (ESRS E1-3)

For TUI Airline, actions to reduce CO₂e emissions are implemented in three different areas: operational fuel efficiency, aircraft fleet modernisation, and use of sustainable aviation fuels (SAF). TUIfly Deutschland actively supports the scientific understanding to reduce the impact of other climate-related effects of aviation, e.g. by taking part in a research programme to prevent contrails under the aegis of the German Aerospace Centre (DLR).

FUEL EFFICIENCY

Continuous improvements in fuel efficiency are a cornerstone of TUI Airline's emission reduction roadmap and a key lever to reduce greenhouse gas emissions from flight operations. Targeted technical and operational measures are taken in order to systematically optimise fuel consumption. The measures, ranging from short-term optimisation schemes to long-term innovation projects, entail close cooperation between the relevant departments and operational areas. They serve to identify potential improvements across the entire aviation process, from flight planning and the flight itself to ground operations.

Examples of efficiency enhancement measures include:

- Weight reduction through technical modifications and optimised loading
- Adjustment of flight profiles, taking current weather data into account
- Digital tools to analyse and optimise flight performance
- Lower fuel consumption on the ground by drawing on external power supply
- Training schemes for pilots to promote fuel-efficient flying

The measures apply to all flights operated by TUI's own fleet and are regularly evaluated and improved. External flight partners are requested to pursue their own efficiency strategies and communicate them in a transparent manner. Implementation depends on available resources, technical developments and the regulatory framework.

FLEET MODERNISATION

TUI's rolling re-fleeting programme is contributing to significant reductions in CO₂e emissions from flight operations. TUI specifically invests in state-of-the-art aircraft such as Boeing 787 and Boeing 737 Max. On average, these planes are around 20% (787) and 15% (737 Max) more fuel-efficient than the aircraft they replace in TUI's fleet. A total of 95 Boeing 737 Max are scheduled for delivery by 2029 – with 45 of these planes already delivered by the end of financial year 2025. As the new aircraft are introduced, older, more fuel-intensive aircraft are successively taken out of service.

Wet lease providers are also requested to supply the most efficient aircraft possible, for example aircraft with winglets. Together with our partners, we analyse fuel data and identify optimisation potential. The re-fleeting measures apply to all flights operated under TUI flight numbers by both the Company's own fleet and external capacity providers, with a focus on TUI's own aircraft.

Currently, around 54% of TUI's fleet is equipped with new engine technology. The implementation of the re-fleeting programme depends largely on Boeing's ability to deliver the agreed aircraft on time.

SUSTAINABLE AVIATION FUEL (SAF)

Sustainable aviation fuels are a key component of TUI Airline's decarbonisation strategy and play a crucial role in reducing CO₂e emissions in aviation. SAF is a liquid fuel that causes significantly lower greenhouse gas emissions over its entire life cycle compared to conventional aircraft fuel. It can be produced from bio-based raw materials such as used cooking oils, non-food animal waste or biodegradable waste from various industries, but it can also be produced synthetically. SAF is a drop-in solution and can be blended with conventional aircraft fuel and used in existing aircraft and infrastructure without any technical modifications.

TUI works with various partners to secure supplies of SAF. SAF can reduce emissions by up to 80% compared to conventional Jet-A1 fuel, and even more with synthetic variants. SAF is going to be used on flights operated under TUI flight numbers, provided that it is available at the respective departure airport. TUI purchases both mandatory quantities in accordance with EU quotas and voluntary quantities.

In financial year 2025, over 11,000 tonnes of SAF were voluntarily refuelled, mainly in Amsterdam. This represents an increase of around 10,000 tonnes year-on-year. The 2% minimum supply mandate for SAF, in force since January 2025, adds further to the total SAF volume. Fuel suppliers largely comply with the EU timeline and will not provide airlines with the documentation required for certification of SAF sourced during calendar year 2025 until February 2026. This means that the total amount of SAF refuelled in financial year 2025 cannot be audited and confirmed until spring 2026. Currently, the evidence is only available for the first three months of the financial year (October to December 2024) under review, as these fall within the previous calendar year.

Allowances for Eligible Aviation Fuels – EU Emissions Trading Scheme (EU ETS): In March 2025, TUI Airline applied for support available under the framework of the European Union Emissions Trading Scheme (EU ETS), Directive (EU) 2003/87/EC, Article 3c(6), and further defined in the Commission Delegated Regulation (EU) 2025/723 supplementing Directive 2003/87/EC of the European Parliament and of the Council. This incentive aims to promote the uptake of eligible aviation fuels, notably of SAF, identified in Regulation (EU) 2023/2405 on ensuring a level playing field for sustainable air transport (ReFuelEU Aviation), by granting EU ETS allowances to commercial aircraft operators that use such fuels on eligible routes within the scheme. By doing so, it seeks to mitigate the cost disparity between conventional kerosene and SAF. The scheme runs by calendar year, and financial support is decided only 9 months after calendar year end. In calendar year 2024, TUI Airline uplifted a total of 5,019 tonnes of eligible aviation fuel, including 3,702 tonnes delivered in the fourth quarter of calendar year 2024, which corresponds to the first quarter of TUI financial year 2025. In the calendar year 2024 1,675 tonnes were attributable to routes falling within the scope of the EU ETS. These include flights within

the European Economic Area (EEA), between the EEA and Switzerland, and flights from the EEA to the United Kingdom. These quantities were substantiated by the documentation required to qualify for the EU ETS incentive. As a result, TUI received 16,871 EU ETS allowances in September 2025, which were credited to the company's EU ETS account. These allowances provided financial relief by offsetting a portion of the additional costs associated with the use of SAF in place of conventional Jet Fuel.

The availability of SAF remains a key challenge. SAF is significantly more expensive than conventional fuel and is subject to considerable price uncertainty. TUI secures SAF volumes by means of letters of intent with suppliers and actively participates in political discussions in the EU and the UK to promote SAF production. The further development of synthetic SAF technologies, in particular, requires targeted support.

REDUCING FURTHER CLIMATE IMPACTS: CONTRAILS

Apart from CO₂ emissions, the global climate is affected by other aviation impacts, in particular contrails. Although greater scientific uncertainty surrounds their exact climate impact compared with CO₂, the overall effect of contrails is assumed to be relevant.

TUI Airline actively engages in research to contain these effects. Since 2024, TUI fly Deutschland has conducted normal passenger flights as test flights to prevent contrails, serving both to gain a better understanding of operations and to carry out scientific evaluation. In the framework of the D-KULT project funded by Germany's Federal Ministry for Economic Affairs and Climate Protection, TUI fly transmitted flight data from over 25 contrail avoidance flights to the German Aerospace Centre (DLR) in calendar year 2024. The evaluations have shown that these avoidance measures are highly effective.

As a partner in the consortium for the A4Climate research project, TUI fly has received funding to conduct additional 400 avoidance flights in the period from 2025 to 2027. In addition, in early 2025, TUI Airline was admitted to the Jet Zero Task & Finish Group Contrail Avoidance in the UK, which aims to conduct test flights in British airspace. Information on the experience gained from these projects was presented at a number of technical conferences. Reducing the climate impact of contrails hinges on technical possibilities and financial mechanisms in the regulatory framework.

Cruises

TARGET (ESRS E1-4)

As part of TUI's Sustainability Agenda, TUI Group, together with the joint venture TUI Cruises and its subsidiary Marella Cruises, has set itself a target to reduce greenhouse gas emissions in Cruises. The aim is to cut CO₂e emissions by 27.5% by 2030 compared to baseline year 2019. As a joint project, the target covers all cruise ships operated by TUI Cruises, including the Mein Schiff and Hapag-Lloyd Cruises brands, as well as the ships operated by Marella Cruises, which belongs to TUI Group. In this way, TUI is supporting to limit global warming to well below 2 °C, based on the applicable absolute contraction approach by the SBTi. This target is, accordingly, not compatible with the goal of 1.5 °C. TUI takes account of the above-mentioned cruise ships along with well-to-wake emissions for cruise activities (emissions from marine fuels, Scope 1 and Scope 3, Category 3). The target exclusively relates to activities in Cruises but includes joint ventures in addition to TUI's own business activities. The companies included differ, therefore, from those in TUI Group's greenhouse gas balance.

The following greenhouse gases associated with climate change are included: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). 80.1% of emissions are allocated to Scope 1 and 19.9% to Scope 3, Category 3. The combined target also reflects future developments, such as the planned expansion of TUI Cruises based on recent growth scenarios.

Science-based targets performance Cruises

		2025	Baseline 2019	Var. %	Target (2030) %
Cruises	t CO ₂ e	1,180,763	1,249,224	- 5.5	- 27.5

A number of decarbonisation levers serve this target. They include the use of lower-emission fuels, the use of shore power, improved energy efficiency and route optimisation. For a more detailed description, please refer to the section on Actions below.

ACTIONS (ESRS E1-3)

Cruises, too, uses a number of decarbonisation levers to achieve the climate change mitigation targets: the use of lower-emission fuels, the use of shore power, improved energy efficiency and route optimisation. The actions outlined below cover TUI's subsidiary Marella Cruises and the joint venture TUI Cruises, with the brands Mein Schiff and Hapag-Lloyd Cruises.

USER OF LOWER-EMISSION FUELS

The transition to lower-emission fuels is a key element of the climate strategy pursued by TUI Group's cruise companies. The goal is to significantly reduce emissions in the marine business area through the gradual adoption of alternative fuels. Currently, all ships operated by TUI Cruises can theoretically be powered with biodiesel or biodiesel blends. Due to the limited availability and high cost of sustainable biofuels, the use of such fuels is phased in gradually and tested in trial runs. Other low-emission fuels, such as synthetic e-fuels and methanol, require technical modifications, for example to engines and fuel tanks.

Since 2022, biodiesel blends have been successfully tested and used by all TUI cruise lines. In the financial year under review, Hapag-Lloyd Cruises' expedition ship HANSEATIC spirit bunkered 100% biofuel for the first time in the port of Amsterdam: 100.6 tonnes of second-generation biofuel made from residual and waste materials, cutting CO₂ emissions by at least 80%. Between May and September 2025, around 6,741 tonnes of biofuel were used on the Marella Cruises vessels Voyager and Discovery. This corresponds to a projected emission reduction of 6,453 tonnes of CO₂e compared with conventional fuel. In addition, TUI Cruises launched Mein Schiff Relax, the first ship with dual-fuel engines technically equipped for the use of e-fuels. In July 2025, the ship was supplied with 1,875m³ of bio-LNG (around 900 tonnes) for the first time – reducing CO₂ emissions by at least 70%.

The potential for emission reductions through the use of alternative fuels depends largely on the availability of such fuels at the respective locations and ports. Developing appropriate infrastructure therefore remains a key success factor.

USE OF SHORE POWER

Using shore power is an effective lever to reduce emissions from cruising. As cruise ships spend around 40% of their operating time in port, facilities providing shore power connection during these layovers can allow cruise ships to turn off their engines and thus significantly cut CO₂ emissions. The shore power capability of the fleet is a key element in reducing emissions at TUI Cruises. Both brands, Mein Schiff and Hapag-Lloyd Cruises, have made a voluntary commitment to use shore power. A prerequisite for the use of shore power is that the power has been produced from renewable sources of energy.

All newbuilds at TUI Cruises are equipped with shore power connections as a standard feature. Existing vessels are being gradually retrofitted during routine dry-dock periods. In the financial year under review, Mein Schiff 3 was equipped with a shore power connection. Twelve of the thirteen ships at TUI Cruises therefore featured the relevant technology by the end of the financial year under review. In financial year 2025, shore power calls increased significantly to 115 calls compared to 72 in the previous year, an increase of 59.7%, with power consumption amounting to 2.8 million kWh.

Marella Cruises, too, uses shore power for its Explorer 2 and made five shore power calls in Malta in the financial year under review, sourcing over 91,000 kWh of electricity in total. An expansion of shore power use aboard Explorer 2 is planned for the future. The availability of shore power in port remains a decisive factor for implementation.

IMPROVING ENERGY EFFICIENCY

Enhancing energy efficiency on board is key to reducing CO₂ emissions in cruise operations. Potential energy savings can be identified and harnessed by well-chosen technical and organisational measures. In the financial year under review, Marella Cruises implemented a selection of measures aboard several ships to improve energy efficiency and cut CO₂ emissions. These include optimising galley equipment aboard the Discovery 2, Explorer and Voyager, as well as installing new propeller caps to improve hydrodynamics aboard the Explorer.

In the financial year under review, TUI Cruises introduced a software solution to improve energy efficiency by combining data analysis and behavioural research to cut fuel consumption. The behavioural changes prompted by the software are expected to result in annual savings of approximately 1,250 tonnes of CO₂e. In addition, Mein Schiff 4 was given a new underwater coating that reduces friction and therefore resistance to enhance fuel efficiency by estimated 6% and fitted with two optimised propellers to improve propulsion.

These continual measures to enhance energy efficiency contribute directly to TUI Group's SBTi climate targets. Actual implementation depends on the availability of necessary components, delivery times and technical challenges during installation.

ROUTE OPTIMISATION

The rolling optimisation of travel itineraries is an effective tool for reducing fuel consumption and associated emissions in cruise operations. The teams of experts at TUI's cruise lines regularly analyse route planning using specialist software.

Savings can be generated by selectively adjusting arrival and departure times and travel speeds. This enables more efficient programme planning, better fuel requirement forecasts and targeted implementation of efficiency enhancement measures. In winter 2004, TUI Cruises introduced a new Voyage Optimisation Tool, which analyses data from actual voyages and helps to identify additional potential for improvement. The potential for route optimisation depends on a number of external factors, including the availability of itineraries, geopolitical developments, local regulations and events, and weather conditions.

Hotels & Resorts

TARGET (ESRS E1-4)

As part of its Sustainability Agenda, TUI Group has set a target for greenhouse gas emission reductions in Hotels & Resorts. CO₂e emissions are to be reduced by 46.2% by 2030. In this way, TUI is helping to limit global warming to 1.5 °C.

The following greenhouse gases associated with climate change are included: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). 41.9% of emissions are allocated to Scope 1 and 58.1% to Scope 2.

The target covers emissions from all sources of energy as well as gases from refrigerants (Scopes 1 and 2). The target refers to owned hotels and hotels with leasing and management contracts, including joint ventures. The scope for the SBT therefore differs from the activities covered by TUI Group's greenhouse gas balance presented in the section Metrics.

The target takes account of future developments such as the planned expansions to the hotel portfolio based on current growth scenarios. Due to portfolio changes, regular assessments are carried out to establish whether the baseline value must be recalculated; if necessary, the value is adjusted accordingly. This process ensures that actual emissions are reported, taking into account changes in the portfolio. In the financial year under review, the baseline value was adjusted in conformity with the SBTi standard to reflect changes in the hotel portfolio. The new value for the baseline year is 875,468 tonnes of CO₂e.

Science-based targets performance Hotels & Resorts

		2025	Baseline 2019	Var. %	Target (2030) %
Hotels & Resorts	t CO ₂ e	722,489	875,468	- 17.5	- 46.2

A number of decarbonisation levers serve the target. They include enhancing energy efficiency, producing energy from renewable sources and sourcing renewables. For a more detailed description, please refer to the section on Actions below.

ACTIONS (ESRS E1-3)

Our hotels and hotel partners continue to focus on promoting the sustainability transformation across their operations. Emission reductions remain our key priority. To that end, the following decarbonisation levers have been identified for Hotels & Resorts so as to achieve our science-based target, and action plans have been drawn up: enhancing energy efficiency, producing energy from renewables and sourcing renewable energy. The actions outlined below cover all hotels owned by TUI Group, either directly or via joint ventures, and hotels operated under lease or management contracts. At the end of the financial year under review, the total number of in-scope hotels was 375.

ENERGY EFFICIENCY

Cutting energy consumption contributes substantially to emission reductions and therefore helps TUI Group achieve its climate-related targets. TUI Group implements a wide range of measures to enhance energy efficiency, including the comprehensive use of modern LED lighting and electric cars.

Sustainable building is an important lever to improve energy efficiency, enabling significant reductions in energy requirements and CO₂ emissions of hotels. The measures implemented in this area are additionally supported by the *Green Building Guidelines* mentioned above. In financial year 2025, examples include the installation of a trigeneration system for combined cooling, heat and power generation at the Royalton Blue Waters in Jamaica, a particularly efficient way to produce and use energy. Energy efficiency measures are continually implemented. The specific measures depend on the availability of technological solutions, specific circumstances in the hotels, the legal framework and the infrastructure in the respective countries.

GENERATING RENEWABLE ENERGY

Expanding the on-site generation of renewable energy is a key element of TUI Group's Sustainability Agenda. The use of energy from solar power enables the Group to significantly reduce emissions and partially cover its electricity requirements. More than a third of all hotels in TUI Hotels & Resorts produce power from renewable sources. In financial year 2025, new photovoltaic systems were installed in hotels around the world, including Riu Touareg in Cape Verde Islands, where a system with a capacity of around 1,500 kWp came onstream. In the period under review, the capacity of photovoltaic systems in Türkiye increased by around 4 megawatts to 19 megawatts. In financial year 2025, photovoltaics are estimated to have cut emissions by 20,000 tonnes of CO₂.

The implementation of photovoltaic systems depends on country-specific conditions, including legal regulations, customs regulations for certain components as well as local availability. In addition, electricity price fluctuations may have an impact on the economic efficiency of the systems.

SOURCING RENEWABLE ENERGIES

Apart from on-site generation, TUI Group selectively procures power from renewable sources in order to further reduce emissions from electricity consumption. Where available, hotels are requested to source electricity through green tariffs, direct Power Purchase Agreements (PPAs), or to obtain Energy Attribute Certificates (EACs). These measures help to significantly reduce their carbon footprint in comparison with the conventional power mix. Examples include TUI's hotel partner Blue Diamond, which managed to reduce 10,000 tonnes of its CO₂ emissions from electricity consumption from a market perspective in financial year 2025 by obtaining EACs.

Sourcing renewable energies is a continuous process heavily dependent on local availability. In many countries, green electricity tariffs are not always available, and EACs can only be obtained in certain regions. In destinations with neither green tariffs nor certificates, TUI Group makes greater use of on-site generation from renewable sources.

TUI Musement

As TUI Musement accounts for a relatively small proportion of TUI's overall emissions, TUI has not established a separate SBTi target covering this business. Nevertheless, TUI Musement implements climate change mitigation measures, contributing to TUI Group's overall net zero ambition (climate neutrality). The key decarbonisation levers are the transition to *Sustainable Mobility* and the *Sustainable Offices* project.

ACTIONS (ESRS E1-3)

SUSTAINABLE MOBILITY

In the framework of the transition to sustainable mobility in ground operations, TUI's fleet of buses uses alternative fuels to reduce its greenhouse gas emissions. Moreover, diesel-powered vehicles for transporting employees are being replaced by hybrid or electric cars as well as e-bikes to cut greenhouse gas emissions from employee transport.

The measures to increase sustainable mobility are ongoing and cover TUI's entire vehicle fleet for ground transport in Spain, Cape Verde Islands, Morocco, Tunisia and Türkiye. Towards this transition, 246 lower-emission vehicles were in operation by the end of the financial year under review. This corresponds to 14.5% of the fleet. In addition, TUI tested two coaches of its fleet in Benidorm, Spain, on Hydrotreated Vegetable Oil (HVO) in financial year 2025. This diesel fuel produced from renewable resources, can reduce lifecycle greenhouse gas emissions by up to 90% compared to conventional diesel. The trial was subsequently extended from two to ten coaches, five in Benidorm and another five in Málaga in the financial year under review. For the future, TUI is planning to replace the diesel-powered fleet with more sustainable electric or hybrid vehicles; this also applies to the vehicle fleet of TUI reps in the destinations. Expanding the use of HVO fully depends on the availability of the fuel and the allocation of resources. To enhance transparency and manage transport emissions more efficiently, TUI is continually implementing measures to strengthen the calculation of greenhouse gas emissions. The focus is on improving the data base for emissions by the Group's own vehicle fleet.

SUSTAINABLE OFFICES PROJECT

TUI continually works to improve the sustainability and reduce greenhouse gas emissions of its office buildings. As a first step, a TUI Group Offices Database was created in order to obtain an overview of the design of existing office buildings. Subsequently, office-related processes were standardised with the introduction of the *Sustainable Office Guidelines*. In addition, questionnaires were used to collect and analyse information about consumption and successful approaches in the offices. The Guidelines and the survey results serve as a basis to initiate measures towards more sustainable office design. The project initially covers all TUI Museum offices around the world fully controlled by TUI Group, whereas airport counters and small harbour offices have not yet been regularly included. The Sustainable Office Guidelines and related surveys were implemented across all TUI Group offices in February 2025.

Complementary disclosures on the climate change mitigation targets (ESRS E1-4)

The climate change mitigation measures described above for TUI Airline, Cruises and Hotel & Resorts have been validated by the SBTi and are derived from scientific findings. They are based on the Greenhouse Gas Protocol methodology and the ambitions of the 2015 Paris Agreement to limit global warming as well as the European Green Deal to become climate neutral by 2050. In establishing the targets, TUI took account of the interests of stakeholders by applying the recognised SBTi methodology, which recognises various stakeholder interests through a range of organisations including CDP, WWF, the UN and the World Resources Institute.

TUI's SBT cover the emissions reported in ESRS E1-6 Scope 1 and Scope 2 (market-based) by 99%, Scope 3, Category 1 by 3% and Scope 3, Category 3 by 94%. Of the total gross GHG emissions reported in E1-6, TUI's SBTs cover 58%.

The year 2019 was selected as the baseline year for all SBTs. The baseline year is therefore representative and unaffected by external factors such as the effects of the COVID-19 pandemic in subsequent years. Unless stated otherwise, the target values were not changed in financial year 2025. No intermediate targets were publicly announced for the three SBTs.

The SBT for TUI Airline is aligned to limiting global warming to well below 2 °C. The target was derived from SBTi's sectoral decarbonisation approach. In establishing the target and the emission reduction roadmaps, future developments such as new technologies and regulatory developments were taken into account. The underlying climate scenarios are based on the SBTi methodology to achieve the ambition of well below 2 °C for airlines.

The SBT for Cruises is aligned to limiting global warming to well below 2 °C. The target was set on the basis of SBTi's Absolute Contraction Approach. In establishing the target and the emission reduction roadmaps, future developments such as new technologies and regulatory developments were taken into account. The underlying climate scenarios are based on the SBTi methodology and the ambition of well below 2 °C.

The SBT for Hotels & Resorts is aligned to limiting global warming to 1.5 °C. The target was set on the basis of SBTi's Absolute Contraction Approach. In establishing the target and the emission reduction roadmaps, future developments such as new technologies and regulatory developments were taken into account. The underlying climate scenarios are based on the SBTi methodology and the ambition of well below 1.5 °C.

The targets are continually monitored by the management of the business areas, the Group Sustainability Team and the Sustainability Council, and the current performance is published annually in the CDP (Carbon Disclosure Project) Report.

Complementary disclosures on climate change mitigation actions (ESRS E1-3)

The greenhouse gas emission reductions achieved through the measures are counted towards the performance of TUI Airline, Cruises and Hotels & Resorts in achieving their Science-based Targets. Total reductions are presented in the annual progress report covering the targets.

The management of the material impacts is driven ahead by members of the Group Sustainability Team and the business areas in charge. Any material investments made in connection with the measures are included in the financial planning for the segments. Disclosures on significant investments, e.g. payments made to modernise our aircraft fleet, are presented in the section on Financial position of the Group. For information on the taxonomy, please refer to the section Disclosures pursuant to the EU Taxonomy Regulation (2020/852); under the taxonomy criteria, the climate change mitigation measures do not result in any taxonomy-aligned disclosures.

See sections [Financial position](#) and [Disclosures pursuant to the EU Taxonomy Regulation \(2020/852\)](#)

Management of risks from impacts of climate change and climate change adaptation

Management approach (ESRS E1-2)

The Group Risk Management Policy governs the handling of existing risks and the identification of potential critical risks within TUI Group in order to secure its long-term success. The management approach comprises all risks and opportunities for the Company and the management of risks relating to emissions as well as TUI's Sustainability Agenda.

The risk management approach aims to reduce risks. An effective Group-wide risk management system also aims to create a positive risk governance and culture. The management approach affects all TUI Group employees at every level of the organisation. The effective implementation of the management approach is the responsibility of the management team of the TUI Group subsidiary concerned. Group functions are responsible for identifying, assessing and handling risks. The Group Risk & Internal Control function provides support and submits regular reports to the Group Risk Oversight Committee (GROC). The GROC's role is to review the risks and formulate risk strategies and management approaches on that basis. It also ensures the effective monitoring of the risks and provides reports to the Executive Board, which has ultimate responsibility for risk management and reviews and approves the strategies and approaches of the GROC.

TUI Group's relevant central functions involved in the risk process submit their questions and comments. The experts involved also represent relevant stakeholder interests and ensure they are taken into account. The Executive Board is in charge of internal and external communication of the management approach. The *Group Risk Policy* is available to all employees on the intranet. The processes and risks are presented in the publicly available Annual Report.

For more detailed information on the processes, please refer to the [Risk report](#).

TARGET (ESRS E1-4)

The climate change mitigation targets mentioned above for TUI Airline, Cruises and Hotels & Resorts help mitigate the climate change-related impacts and minimise the identified risks in relation to climate change and climate change adaptation.

RISK MITIGATION ACTIONS (ESRS E1-3)

Disclosures on risk-mitigating factors are presented in the section Risk report under main risk no. 5 Sustainable tourism and main risk no. 8 Climate change. The scope of the measures differs as described in the section on Actions outlining the design and structure of the measures for TUI Airline, Cruises and Hotels & Resorts. Unless stated otherwise, the measures are continually implemented and optimised.

For more detailed information on risk-mitigating factors, please refer to the [Risk report](#).

Metrics

Energy (ESRS E1-5)

Energy consumption and mix

	2025	2024 ¹
1 Fuel consumption from coal and coal products (MWh)	109	-
2 Fuel consumption from crude oil and petroleum products (MWh)	18,529,133	19,278,562
3 Fuel consumption from natural gas (MWh)	112,432	94,709
4 Fuel consumption from other fossil sources (MWh)	0	-
5 Consumption from purchased or received electricity, heat, steam and cooling from fossil sources (MWh)	669,442	696,612
6 Total consumption of fossil energy (MWh) (sum of lines 1 to 5)	19,311,116	20,069,883
Share of fossil sources in total energy consumption (in %)	98%	99%
7 Consumption from nuclear sources (MWh)	0	-
Share of consumption from nuclear sources in total energy consumption (in %)	0%	0%
8 Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	96,392	2,159
9 Consumption from purchased or acquired electricity, heat, steam and cooling and from renewable sources (MWh)	169,209	199,687
10 Consumption of self-generated non-fuel renewable energy (MWh)	43,665	27,589
11 Total consumption of renewable energy (MWh) (sum of lines 8 to 10)	309,266	229,435
Share of renewable sources in total energy consumption (in %)	2%	1%
Total energy consumption (MWh) (sum of lines 6, 7 and 11)	19,620,382	20,299,318

¹ Previous year's figures are unaudited.

Energy intensity per net revenue

	2025	2024 ¹	% N / N-1
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/€)	0.00081	0.00088	-7.4%

¹ Previous year's figures are unaudited.

Net revenue from activities in high climate impact sectors used to calculate energy intensity

	2025	2024 ¹	Var. %
Total net revenue (Financial statements) (Mio €)	24,179	23,167	+ 4.4
Net revenue (other) (Mio €)	0	-	-

¹ Previous year's figures are unaudited.

CALCULATION BASIS: ENERGY CONSUMPTION AND ENERGY MIX

TUI Airline: The main source of data for TUI Airline is the Airpas system, an industry-specific fuel and cost management solution. The data is collected per flight and transferred to Airpas on a daily basis (overnight). The data is consolidated quarterly at fleet level.

Cruises: The cruise lines use NAPA as their primary data source. NAPA is an industry-specific solution supplying real-time shipping data on a daily basis. The environmental managers enter the data manually into the NAPA system aboard the ships. The data is compiled as a Voyage Performance Report (VPR) once a week or at the end of a voyage and consolidated quarterly for each individual vessel.

Hotels & Resorts: Data collection varies within the portfolio. A small proportion of the hotels have installed AMRs (Automatic Meter Reading) or smart meters for automated data capture. Most data is billed and / or recorded every month. The data is consolidated quarterly for each individual hotel.

TUI Musement: Data is collected based on manual requests for information and consolidated annually at fleet level.

Markets and travel agencies: Data is retrieved manually via invoices or AMRs and consolidated annually at regional level.

Offices: Data retrieval varies, with some sites transferring information via a data capture tool in the form of check boxes. The data is consolidated annually at the level of individual buildings.

DEFINITION OF ENERGY TYPES

Fuel consumption from crude oil and petroleum products: Hotels & Resorts consume heating oil, diesel, petrol, liquefied gas (propane) and butane. Cruises consume HFO (high-sulphur fuel oil), HFO-VLSFO [0.5%], HFO-VLSFO [1.5%] and marine gas oil. Markets, retail shops and central functions consume heating oil. Also included are aircraft fuel for Airlines and diesel for public transportation. Fuel consumption from natural gas relates to the natural gas consumed in Hotels, retail shops and central functions.

Consumption of purchased or acquired electricity, heat, steam or cooling from fossil fuels: This comprises purchases of electricity from the grid by Hotels & Resorts, central functions and retail shops. It includes district heating and cooling purchased by Hotels & Resorts, central functions and retail shops.

Fuel consumption from renewable sources: Comprises the use of biomass by hotels and biofuel.

Fuel consumption of purchased or acquired electricity, heat, steam or cooling from renewable sources: This comprises green electricity acquired by hotels, retail shops and central functions.

Consumption of non-fuel renewable energy generated on site: Comprises e.g. PV energy generated and consumed by hotels.

Energy intensity is derived from the energy consumption mentioned above and net revenues of TUI Group as a whole. TUI's entire business activities must be classified as high climate impact operations.

GHG-Emissions (ESRS E1-6)

Gross GHG emissions from Scope 1, 2 and 3, as well as total GHG emissions

	2025	2024 ¹	% N / N-1	Base year	2025 Target	2030 Target	Annual % target / Base year
Scope 1 GHG emissions							
Gross scope 1 GHG emissions (t CO ₂ e)	4,673,449	4,855,744	-3.8%	n/a	n/a	n/a	n/a
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	33%	-	n/a	n/a	n/a	n/a
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions (t CO ₂ e)	339,440	367,810	-7.7%	n/a	n/a	n/a	n/a
Gross market-based Scope 2 GHG emissions (t CO ₂ e)	145,539	169,176	-14.0%	n/a	n/a	n/a	n/a
Significant Scope 3 GHG emissions							
1 Purchased goods and services	3,806,468	3,854,763	-1.3%	n/a	n/a	n/a	n/a
2 Capital goods	127,749	79,981	59.7%	n/a	n/a	n/a	n/a
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	1,023,596	1,049,915	-2.5%	n/a	n/a	n/a	n/a
4 Upstream transport and distribution	106	125	-15.2%	n/a	n/a	n/a	n/a
5 Waste generation at operations	55,388	55,022	0.7%	n/a	n/a	n/a	n/a
6 Business travel	45,911	47,834	-4.0%	n/a	n/a	n/a	n/a
7 Employee commuting	52,652	52,448	0.4%	n/a	n/a	n/a	n/a
8 Upstream leased assets	n/a	n/a	-	n/a	n/a	n/a	n/a
9 Downstream transportation	n/a	n/a	-	n/a	n/a	n/a	n/a
10 Processing of sold products	n/a	n/a	-	n/a	n/a	n/a	n/a
11 Use of sold products	n/a	n/a	-	n/a	n/a	n/a	n/a
12 End-of-life treatment of sold products	n/a	n/a	-	n/a	n/a	n/a	n/a
13 Downstream leased assets	n/a	n/a	-	n/a	n/a	n/a	n/a
14 Franchises	119,390	108,736	9.8%	n/a	n/a	n/a	n/a
15 Investments	n/a	n/a	-	n/a	n/a	n/a	n/a
Total indirect (Scope 3) gross GHG emissions (t CO ₂ e)	5,231,260	5,248,824	-0.3%	n/a	n/a	n/a	n/a
Total GHG emissions							
Total GHG emissions (location-based) (t CO ₂ e)	10,244,148	10,472,378	-2.2%	n/a	n/a	n/a	n/a
Total GHG emissions (market-based) (t CO ₂ e)	10,050,248	10,273,744	-2.2%	n/a	n/a	n/a	n/a

¹ With the exception of Scope 3.2, all previous year's figures are unaudited.

CALCULATION METHODS FOR THE SCOPE CATEGORIES

Significant change: The scope of TUI's key performance indicator reporting changed in fiscal year 2025 compared with previous years and was adjusted to the requirements of the ESRS standard. The most significant changes are the exclusion of TUI Cruises (Mein Schiff and Hapag-Lloyd fleets) and TUI Hotel & Resorts, which do not comply with the financial consolidation approach. All relevant previous year figures have been recalculated accordingly.

Scope 1: For Scope 1 emissions, the methodological approach comprises the quantification of direct greenhouse gas (GHG) emissions from sources belonging to or controlled by the company, e.g. incineration of fuel in the company's vehicles (aircraft, cruise ships and ground transport), on-site fuel incineration (hotels, larger buildings and retail shops) and the use of coolants. This process follows the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard in order to ensure accuracy and comparability.

Scope 2 (location-based): For Scope 2 emissions, the method comprises calculation of indirect emissions resulting from the consumption of purchased electricity, heat, steam or cooling from own or controlled sources (hotels, larger buildings and retail shops). Our location-based approach calculates emissions using grid average emission factor types (IEA) of the geographic location at which the electricity is consumed, regardless of the specific energy procurement choice.

Scope 2 (market-based): For Scope 2 emissions, the method comprises calculation of indirect emissions resulting from the consumption of purchased electricity, heat, steam or cooling from own or controlled sources (hotels, larger buildings and retail shops). Our market-based approach calculates emissions from electricity that the company has purposefully chosen, deriving supplier-specific emission factors from the data compiler and contractual instruments such as Energy Attribute Certificates (EACs).

Scope 3, Category 1: A combination of spend-based and average-based calculations following the Greenhouse Gas Protocol (GHGP) were used for purchased goods and services. In order to calculate emissions from spend-based data, TUI uses factors provided by the Environmental Protection Agency (EPA) (v1.3 according to NAICS-6). As the approach for this category was updated to include average-based approach, the 2024 values were recalculated.

Scope 3, Category 2: Spend-based data were used for calculation of TUI's capital goods emissions. In order to calculate emissions from spend-based data, TUI uses factors provided by the Environmental Protection Agency (EPA) (v1.3 according to NAICS-6). TUI's calculations for capital goods are in conformance with the spend-based method of the GHGP.

Scope 3, Category 3: Fuel and energy-related data at company level are entered in Sphera on an annual level during the data compilation period. In order to calculate emissions from fuel and energy-related data, TUI uses the factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA), applying the most recent versions available. TUI's calculations for fuel and energy-related activities are in conformance with the average data method of the GHGP.

Scope 3, Category 4: Spend-based emissions were used for all postal and logistics services offered by TUI. In order to calculate emissions from spend-based data, TUI uses factors provided by the Environmental Protection Agency (EPA) (v1.3 according to NAICS-6). TUI's calculations for upstream transportation and distribution are in conformance with the spend-based method of the GHGP.

Scope 3, Category 5: Waste generated in operations is entered into Sphera on an annual basis during the data compilation period. In order to calculate emissions from waste data, TUI uses the factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA), applying the most recent versions. The calculation of Waste generated in operations at TUI is in conformance with the average data method of the GHGP partly applying the waste-type-specific method.

Scope 3, Category 6: Spend-based emissions were used for all business travel within TUI. In order to calculate emissions from spend-based data, TUI uses factors provided by the Environmental Protection Agency (EPA) (v1.3 according to NAICS-6). The calculation of business travel at TUI is in conformance with the spend-based method of the GHGP.

Scope 3, Category 7: All FTE and working contract type (location) data of the consolidated companies is aggregated and shared with an external consultant who have developed an employee emission commuting tool. Factors such as country specific break-downs of commuting times and transport types are accounted for. The calculation of employee commuting emissions is in conformance with the average data method of the GHGP.

Scope 3, Category 8 (immaterial for TUI): TUI Group's main business is to sell travel experiences. The leased assets under TUI's operational control fall under Scopes 1 and 2. This category is therefore not reported.

Scope 3, Categories 9 to 13 (immaterial for TUI): TUI Group's main business is to sell travel experiences. The Company does not sell physical products and does not lease any assets. These categories are therefore not reported.

Scope 3, Category 14: Fuel and energy-related data at the Company level are entered into Sphera on an annual basis during the data compilation period. The list of the portfolio of TUI Hotels & Resorts is provided by Portfolio Management on an annual basis during the data compilation period. TUI's franchise hotels are operated by third-party hoteliers. In order to calculate emissions from fuel and energy-related data, TUI uses the factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA), applying the most recent versions available. The list of the portfolio of TUI Hotels & Resorts is reviewed and the number of franchise hotels counted. Average (market-based) emissions for the franchise hotel brands are calculated and multiplied by the number of franchise hotels in the portfolio in order to obtain the total. TUI's franchise calculations are aligned to the average data method of the GHGP. For a small number of franchise hotels primary data is available which is used instead of the average data method.

Scope 3, Category 15 (immaterial for TUI): TUI Group's main business is to sell travel experiences. TUI does not carry out any investment activities but acquires companies and brands it intends to manage under the TUI banner. This category is therefore not reported.

Gross GHG emissions and biogenic emissions

	Gross GHG emissions (t CO ₂ e)	Biogenic emissions of or from the combustion or bio-degradation (t CO ₂ e)
Scope 1 GHG emissions		
Total Scope 1	4,673,449	3,833 ¹
Scope 2 GHG emissions		
Location-based	339,440	-
Market-based	145,539	-
Significant Scope 3 GHG emissions		
Total Scope 3	5,231,260	-

¹ Comprises biofuel from cruises and hotels

GHG emissions share of consolidated group and associated companies

	Consolidated accounting group (the parent and its subsidiaries) (t CO ₂ e)	Associated companies like joint ventures, and unconsolidated subsidiaries for which the undertaking has operational control (t CO ₂ e)
Scope 1	4,595,257	78,191
Scope 2 location-based	107,849	231,591
Scope 2 market-based	52,581	92,958

CALCULATION BASIS

The calculation of emissions is identical for the consolidated accounting group and the associated companies within the scope.

For *Scope 1 emissions*, the methodological approach comprises the quantification of direct GHG emissions from sources owned or controlled by the company, e.g. the burning of fuel in company assets (aircraft, cruise ships and ground transportation). This process follows the Greenhouse Gas Protocol's Corporate Accounting and Reporting Standard in order to ensure accuracy and comparability.

For *Scope 2 emissions*, the methodology comprises the calculation of indirect emissions resulting from the consumption of purchased electricity, heat, steam or cooling from owned or controlled sources (hotels, business premises and retail shops). Our *location-based approach* calculates emissions using grid average emission factor types (from IEA) of the geographic location at which the electricity is consumed, regardless of the specific energy procurement choice. Our *market-based approach* calculates emissions from electricity that the company has purposefully chosen, drawing on supplier-specific emission factors or contractual instruments such as Energy Attribute Certificates (EACs).

TUI's Scope 3 primary data: 21% of the emissions are calculated using primary data obtained from suppliers and from within businesses own operations. Comprises fuel and energy-related emissions of aircraft, cruise ships and Museum ground transportation vehicles. Comprises fuel and energy-related emissions of fuel burned on site in hotels, retail shops and central functions. Comprises fuel and energy-related emissions from purchased electricity, heating and cooling of hotels, retail outlets and central functions. Comprises waste generated in operations of cruise ships and hotels.

TUI's Scope 3 secondary data: Comprises waste generated in operations of airlines, franchise hotel emissions and employee commuting. Comprises all spend-based calculations, e.g. purchased goods and services, capital goods, business travel and transportation and distribution.

GHG intensity per net revenue

	2025	2024 ¹	Var. %
Net revenue (€m)	24,178.7	23,167.3	+ 4.4
Total GHG emissions (location-based) per net revenue (t CO ₂ e/€)	0.00042	0.00045	-5.9%
Total GHG emissions (market-based) per net revenue (t CO ₂ e/€)	0.00042	0.00044	-6.2%

¹ Previous year's figures are unaudited.

CALCULATION BASIS GHG INTENSITY

Total location-based GHG emissions are divided by the net revenue recognised in the annual financial statements. Total market-based GHG emissions are divided by the net revenue recognised in the annual financial statements.

Market instruments for electricity

Type of contractual instruments electricity	Share of contractual instruments [MWh/MWh total electricity]
Green tariffs	20%
EACs	46%
PPAs	1%

CALCULATION BASIS

The type of electricity consumption according to contract type is reported separately via our Group-wide ESG data capture, analysis and reporting system. *Green tariffs* comprise certified green electricity purchased by hotels, retail shops and central functions. *EACs* comprise Energy Attribute Certificates purchased by hotels. *PPAs* comprise hotel power purchase agreements. The disclosure shows the share of the energy purchased with these contractual instruments in relation to the total volume of purchased energy.

Disclosures relating to the external validation of metrics complied for the section Metrics

The metrics disclosed under E1-5 and E1-6 include fuel consumption data for TUI Airline and associated emissions (in tonnes) externally verified with limited assurance by an independent emission inspection body. This applies to the data consolidated in Scope 1 and Scope 3 Category 3 and the consolidated energy consumption data. Further data compiled in this report was not externally verified by inspection bodies other than those conducting the inspection with limited assurance in the framework of the present report.

Disclosures under the EU Taxonomy Regulation (EU) 2020/852

Pursuant to Article 8 of Regulation (EU) 2020/852 of 18 June 2020 on the Establishment of a Framework to Facilitate Sustainable Investment, TUI AG reports in accordance with the Taxonomy Regulation. Initially, it must be stated which portion of revenues, capital expenditure and operating expenditure of TUI are associated with economic activities described in EU Regulations and Delegated Acts and are thus considered taxonomy-eligible. Additionally, the proportion of these KPIs that can be classified as environmentally sustainable or taxonomy-aligned according to Articles 3 and 9 of the Taxonomy Regulation must be reported.

Environmental sustainability is assessed using technical screening criteria for the following six environmental objectives:

- Climate change mitigation,
- Climate change adaptation,
- Sustainable use and protection of water and marine resources,
- Transition to a circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.

An economic activity qualifies as environmentally sustainable or taxonomy-aligned if it demonstrably makes a substantial contribution to one of the six environmental objectives and does not significantly harm any of the other environmental

objectives. Furthermore, the economic activity has to ensure minimum standards on human rights, including social and labour standards, standards relating to anti-corruption, fair competition and taxation.

For financial year 2023, only economic activities for the environmental objectives of climate change mitigation and climate change adaption were defined by corresponding regulations. These economic activities, if relevant to TUI, are examined for taxonomy eligibility and alignment as in previous years and reported accordingly. As of 1 January 2024, additional economic activities for the remaining environmental objectives became reportable. Accordingly in financial year 2024 additional TUI activities fell under the EU Taxonomy. These include in particular activity 6.19 "Passenger and freight air transport", which is assigned to the environmental objective "Climate change mitigation", and activity 2.1 "Hotels, holiday, camping grounds and similar accommodation", which is assigned to the environmental objective "Protection and restoration of biodiversity and ecosystems". This marked the first time that TUI's core activities were covered. For these activities newly identified last year, the assessment of taxonomy alignment is being conducted for the first time in this reporting year. Compared to the previous year, no new activities became reportable in financial year 2025.

Some of the terms and definitions used in the EU Taxonomy regulations are still unclear with regard to their meaning and interpretation. The EU regularly publishes statements (FAQs) for clarification. Due to the unclarity and the amendments to regulations, TUI incurs the risk of facing a different future interpretation of these indicators and having to change its reporting accordingly.

The amendments to the EU Taxonomy regulations proposed by the European Commission on July 4, 2025, as part of the Omnibus procedure, have not yet entered into force. These amendments are expected to apply from January 1, 2026. Consequently, TUI AG's reporting for the 2025 financial year does not reflect these changes.

Determination of economic activities qualifying as taxonomy-eligible

As a first step, TUI analysed its economic activities to determine whether they correspond to the activities defined in the EU Taxonomy. In doing so, TUI took into account both of economic activities generating external revenue and activities serving its own needs.

The second step was to determine KPI for these economic activities. Where a KPI relates to several economic activities at once, it was broken down, usually based on the direct costs incurred for the activity in question. The reported numbers only include the revenue, capital expenditure and operating expenditure of companies fully included in the consolidated financial statements.

Checking technical screening criteria

Compliance with the relevant technical screening criteria is determined by consulting the respective Group companies or by means of a screening based on higher-level processes and within the framework of national or EU regulations. Where it was not possible to check compliance with technical screening criteria for lack of data or evidence and the economic activity concerned is not material for TUI, no screening was carried out and the economic activity was classified as non-aligned with the Taxonomy in accordance with Commission Notice C/2023/305 dated 20 October 2023, no. 13. The results are described in the following sections on revenue, capital expenditure and operating expenditure.

Checking minimum protection criteria

TUI ensures compliance with the minimum protection criteria through Group-wide policies, training programmes, codes of conduct and risk management systems, which also cover our suppliers and the impact of the services we provide. On compliance with human rights, we refer to the Non-Financial Group Declaration in particular the explanation on ESRS S1, S2 and S4, and with respect to anti-corruption and fair competition, to ESRS G1. In addition, we refer to the Corporate governance report. TUI has also implemented a tax strategy designed to ensure that we are taxed in a manner concomitant with our business, to prevent aggressive or artificial tax planning, to facilitate cooperation with local tax authorities and to manage and review tax risks centrally. In this context, please refer to the publication of our tax strategy at [Reports & Documents | TUI Group - One of the world's leading tourism groups](#). At the reporting date, no relevant litigation was pending in this context.

Revenue

Total revenue is the revenue determined in accordance with international accounting standards and carried as revenue in the Notes. Only revenues of consolidated subsidiaries will be reported as taxonomy-eligible or taxonomy-aligned.

In the TUI Musement segment, customer transport in the destination, e.g. for excursions or transfers between the airport and the hotel, was allocated to economic activity 6.3 "Urban and suburban transport, road passenger transport". The revenue numbers were taken from our internal reporting system. Where this revenue also related to other economic

activities, e.g. in the case of excursions involving not only transport but also guided tours, it was allocated on the basis of direct costs. Revenue from coach transport services provided by third parties is only recognised if this revenue meets the definitions of international accounting standards and if TUI controls the underlying processes.

The revenue generated in the Cruises segment is allocated to economic activity 6.11 "Sea and coastal passenger water transport". Revenue in the Northern Region segment includes revenue from economic activity 6.7 "Inland passenger water transport". The revenue is regularly generated from sales of package tours consisting, for example, of a flight, transport to the destination and overnight accommodation on a ship. For the purposes of the EU Taxonomy, this revenue is broken down in line with the direct costs incurred so as to determine the revenue attributable to passenger transport by ship.

The revenue earned from the economic activities 6.19 "Passenger and freight air transport" and 2.1 "Hotels, holiday, camping grounds and similar accommodation" are generated in the Northern Region, Central Region, Western Region and Hotels & Resorts segments. These activities encompass flight operations and the accommodation services offered by TUI and are therefore core activities. Where revenue is generated as part of a package tour, the taxonomy-eligible revenue is derived from intra-Group costs. In financial year 2025, the internal reports forming the basis for calculating revenues for economic activity 2.1 'Hotels, holiday, camping grounds and similar accommodation' were comprehensively redesigned. To ensure year-on-year comparability, the revenues for financial year 2024 were adjusted accordingly. Furthermore, these revenues have been adjusted to eliminate duplicate entries that were included in the prior year. Revenue generated on the basis of flight or hotel capacity provided by third parties is only recognised if it meets the definitions of international accounting standards and if TUI controls the underlying processes.

The proportion of total revenues accounted for by taxonomy-eligible revenues decreased from 36,4% to 35,4%. The decrease is caused by a higher share of dynamic packaging solutions in financial year 2025 in comparison to prior year. TUI does not pre-commit for flight or accommodation capacity in relation to dynamic packaging, accordingly the share of revenues based on controlled processes declined. TUI did not report any taxonomy-aligned revenues.

Revenues from activity 6.19 "Passenger and Freight Air Transport" do not fully meet the criteria for taxonomy-alignment, partly because the EU Taxonomy Regulation considers the use of certain chemicals as impairing other environmental objectives. However, these chemicals are employed in flight operations for safety reasons, in compliance with other EU regulations. The amendments to the EU Taxonomy proposed under the so-called Omnibus procedure would modify this requirement. Once the legal act becomes applicable, TUI expects an increase in taxonomy-aligned revenues.

Capital expenditure

Capital expenditure summarises the additions to the relevant assets mentioned in the Notes in the sections "Goodwill", "Other intangible assets", "Property, plant and equipment" and "Right-of-use assets". In financial year 2024, additions from mergers were carried under Other intangible assets (€1.1m).

The total capital expenditure of €1,055.7m breaks down as follows for financial year 2024:

Other intangible assets	€154.0m
Property, plant and equipment	€751.7m
Right-of-use assets	€150.0m

As a rule, capital expenditure is allocated to individual economic activities on the basis of our internal project controlling and account assignments in Group reporting. Overall, taxonomy-eligible capital expenditure accounts for 79.8% of total capital expenditure (previous year 71.3%). The year-on-year increase is mainly due to the increased capital expenditure for aircrafts and hotels. In financial year 2024 no taxonomy-aligned capital expenditure was reported.

Operating expenditure

TUI's operating expenditure includes non-capitalised direct expenditure for building refurbishment, short-term leases, maintenance and repair as well as any other direct expenditure incurred in connection with the day-to-day maintenance of property, plant and equipment, intangible assets and right-of-use assets. Where necessary, operating expenditure is allocated to an economic activity on a cost basis. The allocation to economic activities follows the allocation of capital expenditure. The review of the taxonomy eligibility and alignment of operating expenditure follows a review of the respective property, plant and equipment, other intangible assets or right-of-use assets to which they can be allocated. Accordingly, no taxonomy-aligned operating expenditures were identified. Taxonomy-eligible operating expenditure thus accounts for 92,4% of total operating expenditure (previous year 91.5%).

Revenue 2025

Economic activities (1)	Code (2)	Revenue (3)	Proportion of revenue 2025 (4)	Substantial contribution criteria						DNSH ('Does not significantly harm')						Minimum safeguards (17)	Portion of taxonomie-aligned (A.1.) or taxonomie-eligible (A.2.) turnover, 2024 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
				Climate change mitigation (5)	Climate change adaption (6)	Water Pollution (7)	Pollution (8)	Circular economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaption (12)	Water Pollution (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
Revenues environmentally sustainable activities (taxonomy-aligned) (A.1.)		0.0	0.0														0.0		
Thereof enabling activities		0.0	0.0														0.0		
Thereof transitional activities		0.0	0.0														0.0		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Hotels, holiday, camping grounds and similar accomodation		BIO 2.1	2,645.0	10.9	N/EL	N/EL	N/EL	N/EL	N/EL	EL							10.9 ¹		
Passenger and freight air transport		CCM 6.19	5,082.5	21.1	EL	N/EL	N/EL	N/EL	N/EL	N/EL							22.2		
Sea and coastal passenger water transport		CCM 6.11	676.5	2.8	EL	N/EL	N/EL	N/EL	N/EL	N/EL							2.6		
Urban and suburban transport, road passenger transport		CCM 6.3	103.6	0.4	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.6		
Inland passenger water transport		CCM 6.7	41.4	0.2	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.1		
Revenues taxonomy-eligible but not environmentally sustainable activities (non-taxonomy-aligned activities) (A.2.)		8,549.0	35.4	24.5	0.0	0.0	0.0	0.0	10.9								36.4¹		

Revenue 2025

Economic activities (1)	Code (2)	Revenue (3)	Proportion of revenue 2025 (4)	Substantial contribution criteria						DNSH ('Does not significantly harm')						Minimum safeguards (17)	Portion of taxonomically-aligned (A.1.) or taxonomy-eligible (A.2.) turnover, 2024 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
				Climate change mitigation (5)	Climate change adaptation (6)	Water Pollution (7)	Pollution (8)	Circular economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water Pollution (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
A. Revenues of taxonomy-eligible activities (A.1.+A.2.)		8,549.0	35.4	24.5	0.0	0.0	0.0	0.0	10.9								36.4¹		
B. Taxonomy-non-eligible activities																			
Revenue from taxonomy-non-eligible activities		15,629.7	64.6																
Total		24,178.7	100.0																

¹ adjusted (unaudited)

Abbreviations

Y - Yes, Taxonomy-eligible and and Taxonomy-aligned activity with the relevant environmental objective

N - No, Taxonomy-eligible, but not Taxonomy-aligned activity with the relevant environmental objective

EL - Eligible, Taxonomy-eligible activity for the relevant environmental objective

N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Capital Expenditure (CapEx) 2025

				Substantial contribution criteria						DNSH ('Does not significantly harm')									
Economic activities (1)	Code (2)	CapEx (3)	Proportion of CapEx 2025 (4)	Climate change mitigation (5)	Climate change adaption (6)	Water (7)	Pollution(8)	Circulareconomy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaption (12)	Water (13)	Pollution(14)	Circulareconomy (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Portion of taxonomically-aligned CapEx, 2024 (A.1.) or taxonomy-eligible CapEx, 2024 (A.2.) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
CapEx environmentally sustainable activities (taxonomy-aligned) (A.1.)		0.0	0.0														0.0		
Thereof enabling activities		0.0	0.0														0.0	E	
Thereof transitional activities		0.0	0.0																
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)																			
						EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL								
Hotels, holiday, camping grounds and similar accomodation		BIO 2.1	375.3	35.5	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	EL						31.8		
Passenger and freight air transport		CCM 6.19	375,4	35.6	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						30.3		
Sea and coastal passenger water transport		CCM 6.11	68.7	6.5	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						5.6		
Urban and suburban transport, road passenger transport		CCM 6.3	5.5	0.5	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						1.2		
Acquisition and ownership of buildings		CCM 7.7	16.8	1.6	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						0.0		
Renovation of existing buildings		CCM 7.2	0.8	0.1	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						0.9		
Electricity generation using solar photovoltaic technology		CCM 4.1	0.0	0.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL						1.5		

Capital Expenditure (CapEx) 2025

Economic activities (1)	Code (2)	CapEx (3)	Proportion of CapEx 2025 (4)	Substantial contribution criteria						DNSH ('Does not significantly harm')						Minimum safeguards (17)	Portion of taxonomically-aligned CapEx, 2024 (A.1.) or taxonomically-eligible CapEx, 2024 (A.2.) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
CapEx taxonomy-eligible but not environmentally sustainable activities (non-taxonomy-aligned activities) (A.2.)		842.5	79.8	44.3	0.0	0.0	0.0	0.0	35.5								71.3		
A. CapEx of taxonomy-eligible activities (A.1.+A.2.)		842.5	79.8	44.3	0.0	0.0	0.0	0.0	35.5								71.3		
B. Taxonomy-non-eligible activities																			
CapEx from taxonomy-non-eligible activities		213.2	20.2																
Total		1,055.7	100.0																

Abbreviations

Y - Yes, Taxonomy-eligible and and Taxonomy-aligned activity with the relevant environmental objective

N - No, Taxonomy-eligible, but not Taxonomy-aligned activity with the relevant environmental objective

EL - Eligible, Taxonomy-eligible activity for the relevant environmental objective

N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Operating Expenditure (OpEx) 2025

Economic activities (1)	Code (2)	OpEx (3)	Proportion of OpEx 2025 (4)	Substantial contribution criteria						DNSH ('Does not significantly harm')						Minimum safeguards (17)	Portion of taxonomically-aligned OpEx, 2024 (A.1.) or taxonomy-eligible OpEx, 2024 (A.2.) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
				Climate change mitigation (5)	Climate change adaption (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaption (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
OpEx environmentally sustainable activities (taxonomy-aligned) (A.1.)		0.0	0.0														0.0		
Thereof enabling activities		0.0	0.0														0.0		
Thereof transitional activities		0.0	0.0														0.0		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)					EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Hotels, holiday, camping grounds and similar accomodation		BIO 2.1	91.7	11.2	N/EL	N/EL	N/EL	N/EL	N/EL	EL							10,8		
Passenger and freight air transport		CCM 6.19	572.3	69.8	EL	N/EL	N/EL	N/EL	N/EL	N/EL							68,8		
Urban and suburban transport, road passenger transport		CCM 6.3	16.3	2.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL							1.9		
Sea and coastal passenger water transport		CCM 6.11	65.5	8.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL							7.6		
Renovation of existing buildings		CCM 7.2	8.6	1.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL							2.0		
Data processing, hosting and related activities		CCM 8.1	3.1	0.4	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.4		

Operating Expenditure (OpEx) 2025

Economic activities (1)	Code (2)	OpEx (3)	Proportion of OpEx 2025 (4)	Substantial contribution criteria						DNSH ('Does not significantly harm')						Minimum safeguards (17)	Portion of taxonomically-aligned (A.1.) or taxonomy-eligible (A.2.) OpEx, 2024 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity and ecosystems (16)				
		€ million	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	in %	E	T
OpEx taxonomy-eligible but not environmentally sustainable activities (non-taxonomy-aligned activities) (A.2.)		757.5	92.4	81.2	0.0	0.0	0.0	0.0	11.2								91.5		
A. OpEx of taxonomy-eligible activities (A.1.+A.2.)		757.5	92.4	81.2	0.0	0.0	0.0	0.0	11.2								91.5		
B. Taxonomy-non-eligible activities																			
OpEx from taxonomy-non-eligible activities		62.0	7.6																
Total		819.5	100.0																

Abbreviations

Y - Yes, Taxonomy-eligible and and Taxonomy-aligned activity with the relevant environmental objective

N - No, Taxonomy-eligible, but not Taxonomy-aligned activity with the relevant environmental objective

EL - Eligible, Taxonomy-eligible activity for the relevant environmental objective

N/EL - Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Proportion of revenue / Total revenue

%	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	-	24.5
Climate change adaption (CCA)	-	-
Water and marine resources (WTR)	-	-
Circular economy (CE)	-	-
Pollution (PPC)	-	-
Biodiversity and ecosystems (BIO)	-	10.9

Proportion of CapEx / Total CapEx

%	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	-	44.3
Climate change adaption (CCA)	-	-
Water and marine resources (WTR)	-	-
Circular economy (CE)	-	-
Pollution (PPC)	-	-
Biodiversity and ecosystems (BIO)	-	35.5

Proportion of OpEx / Total OpEx

%	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	-	81.2
Climate change adaption (CCA)	-	-
Water and marine resources (WTR)	-	-
Circular economy (CE)	-	-
Pollution (PPC)	-	-
Biodiversity and ecosystems (BIO)	-	11.2

Social information

Own workforce (S1)

Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)

The table below provides an overview of the results of our double materiality assessment of material impacts and risks relating to our own workforce.

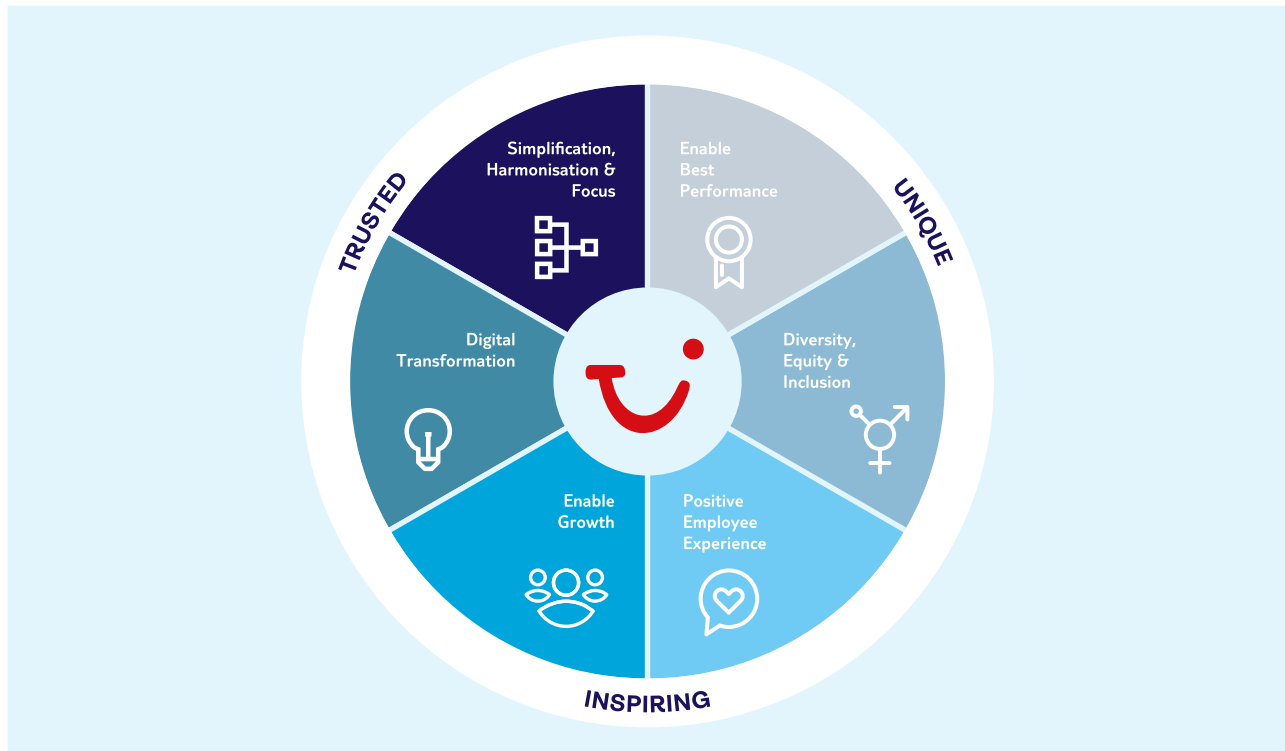
S1 Own workforce

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Training and skills development	Positive Impact	Short-, medium- and long-term	Own Operations	TUI creates a positive impact in the short-, medium- and long-term on their own employees with increasing competence, confidence, growth and organizational innovation as well as competitiveness due to an established training and skills development and support of their career development. Examples for training and skills development for its employees are various learning and development opportunities, such as on-the-job training, instructor led sessions both face to face and virtually, coaching, or mentoring. The career development exists of providing feedback, guidance, and recognition.
Employment and inclusion of persons with disabilities	Positive Impact	Short-, medium- and long-term	Own Operations	TUI creates a positive impact in the short-, medium- and long-term on their own employees with disabilities based on diversity, inclusion, and empowerment, as well as its organizational culture and performance. This impact is generated through opportunities, reasonable accommodation, support services and the absence of any form of discrimination, harassment, or stigma in the workplace.
Diversity	Positive Impact	Short-, medium- and long-term	Own Operations	TUI values and respects the diversity of its employees, customers, and stakeholders, and strives to create an inclusive and equitable workplace where everyone can contribute and thrive. TUI's diversity impacts its employee engagement, innovation, and performance, as well as its customer satisfaction and social responsibility.
Gender equality and equal pay for work of equal value	Positive Impact	Short-, medium- and long-term	Own Operations	TUI promotes gender equality and equal pay for work of equal value among its employees, by ensuring that men, women and diverse have the same rights, opportunities, and responsibilities in the workplace, and that they receive the same remuneration for the same work or work of equal value. TUI's gender equality and equal pay for work of equal value impact its employee fairness, recognition, and motivation, as well as its organizational culture and performance.
Work-life balance	Positive Impact	Short-, medium- and long-term	Own Operations	TUI creates a positive impact on its own employees' work-life balance such as their well-being, happiness, and performance, as well as its organizational culture and reputation in the short-, medium- and long-term, by offering them flexible and diverse working arrangements and by providing them with various benefits, such as parental leave, child-care support, or wellbeing programs.
Adequate wages	Positive Impact	Short-, medium- and long-term	Own Operations	TUI creates a positive impact in the short-, medium- and long-term on their employees by paying adequate wages, which are aligned with the market rates, the living costs, and the performance and qualifications of the employees. TUI also ensures that its employees receive their wages on time, and that they are informed of their wage components and deductions
Adequate wages	Risk	Short-, medium- and long-term	Own Operations	TUI faces the risk of higher costs in the short-, medium- and long-term due to filling potential vacancies by hiring employees from agencies or externals at higher costs.

TUI People Strategy (ESRS S1-1)

TUI is a people business and our people are at the heart of everything we do. Our vision is to be digital, engaging and inclusive. Our People Strategy forms the centrepiece for the implementation of this vision. TUI's success largely depends on the engagement of its employees. It is therefore crucial for us to define who we want to be as a Company and what it means to work for TUI. Our People Strategy with its six key areas of action forms the basis for implementing this vision and addresses all the material impacts and risks identified. The activities and areas of action derived manage the impacts and risks relating to our employees in a targeted manner.

Key areas of action of our People Strategy



- **Enable Best Performance:** the actions empower employees to perform at their best. This objective is served by a broad range of development and learning formats.
- **Diversity, Equity & Inclusion:** the actions create an environment where employees feel accepted, appreciated and included. All employees have the same career opportunities and receive equal pay for work of equal value.
- **Positive Employee Experience:** the actions create an environment where people feel comfortable, trusted and able to work flexibly.
- **Enable Growth:** the actions ensure that new employees are recruited in a demanding labour market. They ensure talent succession and include the launch of a new TUI Careers website to strengthen our social media presence.
- **Digital Transformation:** the actions centre on harmonising and digitising our HR systems and the use of artificial intelligence to facilitate data-driven decision-making.
- **Simplification, Harmonisation & Focus:** our measures are guided by the principles of simplification, harmonisation and focus in order to realign and enhance the efficiency of our organisational structure in HR by consolidating expertise globally.

The present report does not include actions falling under Simplification, Harmonisation & Focus or Digital Transformation as these topics are not covered by Sustainability Reporting.

The People Strategy applies to TUI Group's own workforce. Employees working at Riu Hotels & Resorts are not included in the policies, actions or targets of TUI's People Strategy since they are the responsibility of Riu's management team. Implementing the strategy is the responsibility of the Executive Board, the Group Executive Committee (GEC) and the HR Leadership Team (HRLT) and contributes to three Sustainable Development Goals (SDGs) of the United Nations: Gender equality, Decent work and economic growth, and Reduced inequalities. TUI uses various engagement formats to understand the interests of its employees and aligns its People Strategy accordingly. For further information, please refer to the section on Processes for engaging with own workforce and workers' representatives. Our strategy is communicated via the intranet (Smile), via live chats and at a range of other events. The strategy is implemented through further initiatives such as the Diversity, Equity & Inclusion Strategy (DEI Strategy), all of which refer back to TUI's overarching strategy. The People Strategy is based on a holistic concept and applies right across the Group. For a more detailed description,

the actions and targets defined for each area of the People Strategy have been outlined with a view to the positive impacts and risks for employees.

Managing impacts, risks and opportunities

Enable best performance (ESRS S1-13)

MANAGEMENT APPROACH LOOK@LEARNING

TUI uses the global Look@Learning approach, launched in April 2025, to strengthen the skills of its employees in a targeted manner and with that enhance the Company's competitiveness. The key objective is to create a consistent, inclusive learning journey with training and skills development programmes for all employees. Creating a global learning solution underlines TUI's commitment to developing its employees and executives, supports the business strategy, promotes innovation and facilitates TUI's business success. These development opportunities help TUI attract and retain high-performing employees. TUI's employees are thus empowered to achieve their potential and acquire the skills they need to succeed in an evolving global environment. Look@Learning offers four modules:

- Self-paced learning which takes place online
- Virtual training programmes
- Instructor-led virtual or face-to-face sessions
- Peer-to-peer/social learning in the framework of a mentoring or coaching concept.

In developing the approach, attention is explicitly paid to the interests of stakeholders. Voluntary and anonymous feedback helps to identify areas in which additional support or adjustments are needed, triggering continuous improvements to the learning approach. Based on a communication plan, Look@Learning will be made available to all TUI employees and can be tailored to the needs of all employees with access to our global learning platform TUI People (SAP Success Factors). The plan includes monthly updates of the policy, communication via Smile and the Learning Lounge, and integration into the TUI People learning platform. Information is also shared via webinars, the People Development & Culture teams, leaders and the HRLT. The initiative for this project was taken by the Chief People Officer (CPO) and the Director of Global Talent, People Development and Culture in Learning & Development.

TARGETS

The management approach and the corresponding actions were introduced and implemented in the financial year under review. Targets are to be set in the forthcoming financial year. The success of Look@Learning to date has been gauged by employee interest in the management approach and the monthly updates on new learning options available. Since the launch of the programme, the monthly updates and information about the modules on offer have been accessed by 10,489 employees.

ACTIONS

As part of the Look@Learning approach, TUI has developed personalised training for its employees. Collectively, these different learning methods form a comprehensive learning model that supports the effective acquisition, application and retention of knowledge and skills. During the first stage, in addition to these methods, TUI is offering a Skills for All programme with tailored learning for all employees and a Skills for Leaders programme for leaders. During the second stage, a Skills for Business programme will be rolled out to several business units. With Skills for All, TUI has defined appropriate learning topics for its employees around the world. The programme helps employees to develop the skills they need in order to excel in their respective roles and achieve their career aspirations. Key topics are communication skills, change, critical thinking, inclusion, technical skills and personal effectiveness. The Skills for Leaders programme covers globally relevant learning topics for business leaders. It enables them to develop their skills, support the development of other employees and achieve their career aspirations. The key learning topics, therefore, are coaching and developing other employees, delegation and empowerment, and emotional intelligence.

The Look@Learning programmes apply to TUI's own employees, with limited availability for seasonal employees in Hotels & Resorts. The first stage of Skills for Leaders and Skills for All launched successfully in April 2025. The second stage with the individual learning approach for separate business units will follow in financial year 2026.

Diversity, Equity & Inclusion (ESRS S1-9/12/16)

MANAGEMENT APPROACH “COME AS YOU ARE”

“Come as you are” is a Group-wide approach to diversity, equity and inclusion which further strengthens TUI and opens up numerous opportunities. Our approach is based on three pillars:

People and culture	Inclusive leadership	Community
People and Culture helps to attract, recruit, develop and retain a diverse workforce. The focus is on assessing inclusive recruitment processes, fair promotion criteria, training programmes and workplace accessibility, to ensure that everyone can fulfil their potential without bias. Another objective is to encourage and support global and local networking groups, involving them in decision-making and enabling them to provide feedback to help achieve ambitions. Progress is monitored and reported to help track it.	Inclusive leadership is designed to build trust and create open working cultures in which everyone can excel; this makes inclusive leadership essential. The leadership team is responsible for promoting the “Come as you are” approach and integrating it into performance evaluations and goal setting. The development of cultural competence among leaders will help them to understand and recognise discriminatory behaviour and initiate potential countermeasures, thereby fostering a more inclusive culture. TUI supports and develops diverse employees equally throughout their careers. This pillar includes equal pay, as well as participation in global initiatives such as allyship and women in leadership programmes.	Community fosters global partnerships and creates a determined commitment to social responsibility and ethical practices. TUI wants to play a part in changing the world beyond the Company, supporting underrepresented groups through the TUI Care Foundation. TUI seeks feedback through benchmark data on whether it is seen as diverse and inclusive. The goal is to attract potential employees and promote the sense of community and corporate loyalty among existing employees.

The management approach “Come as you are” applies to TUI’s own workforce. The approach is shaped by the interests and needs of a diverse range of stakeholders, ensuring it is inclusive and effective, and aligned with broader commitments. Employees are included in the TUIgether+ survey with its comment function to ensure their perspective is reflected. Additionally, leadership and HR are affected by playing a key role in implementing the policy. This approach is communicated both internally and externally to ensure alignment and engagement with all stakeholders. Internal communication takes the form of company-wide announcements, launch events, HR all-hands meetings, and regular workshops and discussions. External communication is available through the corporate website, the careers site, and the statements on job alerts. TUI’s management approach for Diversity, Equity and Inclusion aims to prevent discrimination and supports equality for TUI employees. It also tackles the grounds for discrimination, such as race, ethnicity, gender, sexual orientation, national origin, gender identity, disability, age, religion, political views and social origin, as well as other forms of discrimination. TUI pays specific attention to people from groups at particular risk of vulnerability and has committed itself to be an inclusive employer with internal benchmarks for diversity, like the targets mentioned below. TUI is also subject to legal requirements, which differ between countries and local jurisdictions. TUI complies with local requirements, e.g. the quota for employees with severe disabilities in Germany. The management approach is communicated to all employees to foster an awareness of preventing discrimination. In addition, there are specific training programmes about inclusion for all employees. If TUI becomes aware of any complaints or cases of discrimination, e.g. through the TUI Speak Up Line, remedial measures and processes are initiated. Responsibility for the implementation of “Come as you are” lies with the CPO, the HRLT and the Head of People Development and Culture at TUI.

TARGETS

People and culture

TUI's target is to be recognised by 2030 as an inclusive employer, with the aim of achieving a score of 85% or more in an internal DEI survey.

In the financial year under review, TUI worked towards the first target by carrying out a comprehensive impact assessment on the accessibility of office buildings at the head office sites, drew up an Inclusive Hiring Guideline, carried out neuroinclusion training programmes with external providers and launched a global project focusing on disability with supporting targets. For the second target, TUI is currently in talks with various providers to determine the benchmarking option. A final decision on measuring target achievement is still outstanding. Progress towards target achievement is measured by the Inclusion and Authenticity Score in the TUIgether+ survey. In the financial year under review, Authenticity rose by one percentage point from 83 to 84. Inclusive leadership also improved by one percentage point from 73 to 74.

Inclusive leadership

TUI aims to increase the proportion of women in leadership positions to 35% by 2026. The target of 35% women in leadership positions was achieved in the financial year under review due to a changeover of the reporting logic and will be examined for a potential need for adjustments in the forthcoming financial year. Target achievement will be tracked every quarter with specific reporting to the GEC, measuring the proportion of women in leadership functions in the light of the targets fixed.

Community

By December 2026, TUI aims to have established at least five new accreditations for DEI partnerships. In the financial year under review, TUI became a member of the Business Disability Forum. The current target achievement status is regularly reported to the HRLT and tracked by that body.

The targets for the "Come as you are" approach are likewise divided into the three pillars: People and Culture, Inclusive Leadership and Community. The target values relate to TUI's own employees. All Diversity, Equity and Inclusion targets were defined based on various internal calculations within the departments, taking into account challenges and potential for improvement. Ultimately, they were approved by the Executive Board. Since all targets for Diversity, Equity & Inclusion are absolute targets, no baseline year applies. Various stakeholder groups were involved in the target setting process. Apart from senior leadership and the HRLT, additional interaction took place with the GEC and all Managing Directors. Moreover, various colleagues across TUI Group, as well as employee networking groups and graduates, took part.

ACTIONS

To foster positive impacts on its employees in the field of Diversity, Equity & Inclusion, TUI implemented the following actions.

People and culture

TUI plans to develop an inclusive talent acquisition process. The current recruitment practice will be evaluated, as will the understanding of possible opportunities and gaps in practical DEI implementation. The next step will be to suggest improvements and train the recruiters and managers leading the process. Furthermore, TUI plans to conduct an impact assessment on accessibility in the workplace. The goal is to implement changes that will enable TUI to attract and retain people with disabilities. A report will outline the necessary changes as well as the cost and priorities for Company businesses. The communication of the findings and the implementation of the actions to recruit people with disabilities will be planned on that basis. The actions mentioned above are divided into smaller tasks with a timeframe to execution of 6-12 months. For the accessibility assessment, TUI is setting up working groups and liaising with an external provider called Access Able.

Inclusive leadership

A key area of the programme is to create a working environment offering women equal opportunities to lead, grow and succeed. A review of existing guidelines across all functions and topics helps evaluate and update those guidelines to ensure they support gender equality, for example by offering flexible working arrangements and parental leave. Cultural change comprises initiatives that challenge bias and promote and recognise inclusive leadership. Progress is tracked with the aid of accountability actions such as the use of clear metrics and reporting mechanisms, which also ensure that TUI is held to account. The programme is still in its early stages, with the key areas currently being developed. It is not possible yet to set a time horizon for completing the action.

Community

TUI aims to develop external partnerships with leading organisations to amplify its positive impact, drive systemic change, and create a more inclusive environment for colleagues, customers and communities. Key content includes enhancing DEI expertise and leveraging external partnerships to bring cutting-edge knowledge, tools and resources into TUI. The actions for developing partnerships with external organisations and the TUI Care Foundation have already started and should be completed by 2026. The external partnerships workstream has already identified five potential partnerships that align with the DEI targets and offer opportunities to drive progress. These partnerships include the International LGBTQ+ Travel Association (IGLTA). The next steps will be to finalise the partnerships, develop action plans, engage employees and measure the impact.

EQUAL PAY

The strategic goal is to gain insights into the extent to which a gender pay gap exists at TUI and to define actions to reduce potential gaps on a global and local basis. Key actions for equal pay at TUI include collecting the remuneration data of all employees to calculate the gender pay gap. TUI has established a standardised global reporting system for that

purpose, using annual data to calculate the unadjusted and adjusted gender pay gap. The unadjusted gender pay gap reflects the difference without accounting for factors such as job family, role level or other relevant comparators. For the purpose of defining effective targets, TUI additionally determines an adjusted gender pay gap metric, which compares average pay levels between female and male employees within comparable job families. This approach ensures a like-for-like comparison as it takes account of structural differences and therefore provides a more accurate reflection of equal pay across similar roles. This forms part of our broader efforts to promote equal opportunities. TUI is committed to identifying potential structural inequalities at an early stage and addressing them through targeted measures. The analysis covers 48,735 employees in 45 countries. The actions are continually implemented, with gender pay gap calculations carried out annually. The effectiveness of actions to address impacts and risks is measured through the annual tracking of the gender pay gap.

All actions outlined in the DEI section relate to TUI's own workforce. The effectiveness of the actions in addressing impacts and risks is measured indirectly based on progress towards target delivery.

METRICS

DIVERSITY

Gender distribution in number of employees (head count) at top management level

	2025		2024 ¹	
	No. of employees	in %	No. of employees	in %
Male	105	65.6%	97	66.9%
Female	55	34.4%	48	33.1%
Other	0	0.0%	0	0.0%
Total	160	100.0%	145	100.0%

¹ Previous year's figures are unaudited.

At TUI, the top management level consists of global leaders who determine and drive the business strategy. The relevant population for this data point is determined on the basis of a qualified analysis, in which all employees are grouped into bands between 1 and 6, with band 1 being the Executive Board level. For this data point, the population consists of top management in band 2, i.e. Executive Board level minus 1. This metric is defined as gender distribution among employees at the top management level.

Age structure of employees

	2025		2024 ²	
	No. of employees	in %	No. of employees	in %
<30 years old ¹	15,435	30.0%	16,995	32.5%
30–50 years old	23,912	46.5%	23,926	45.8%
>50 years old	12,093	23.5%	11,323	21.7%
Total	51,440	100.0%	52,244	100.0%

¹ In financial year 2024, the corresponding age group comprised individuals under 31 years of age. An adjustment was made in financial year 2025 to comply with CSRD requirements.

² Previous year's figures are unaudited.

This metric is defined as number of employees broken down by age groups "Under 30 years", "30-50 years" and "Over 50 years", excluding executives, interns and Riu Hotels & Resorts employees.

REMUNERATION METRICS (GENDER PAY GAP AND TOTAL REMUNERATION)

Gender pay gap

	2025
Gender pay gap in % – unadjusted	21.78

The gender pay gap is defined as the difference in average pay between female and male employees, expressed as a percentage of the average pay of male employees. The calculation includes all active employees with permanent or temporary contracts, excluding the Executive Board of TUI AG, non-guaranteed hours employees and interns.

Total remuneration

	2025
Total remuneration	33:1

This metric is defined as the total annual remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual). Due to the even number of employees (a total of 48,734 employees excluding the highest-paid individual), the median does not reflect the remuneration of an individual employee, but rather the average of the remuneration of two employees.

Positive Employee Experience (ESRS S1-15)

MANAGEMENT APPROACH

In order to strengthen the work-life balance, TUI developed a management approach for the creation of a positive employee experience which covers different aspects of the work-life balance. The management approach is set out in the TUI Workwide approach and in the TUI Way of Working. TUI aims to holistically promote the wellbeing of all employees and anchor it in TUI's culture. The goal is to ensure that responsibility is shared between the leadership level, managers and all employees. Solving key wellbeing challenges is designed to enhance employee engagement, productivity and retention.

The management approach related to Positive Employee Experience applies to TUI's own workforce and is aligned to global best practices. However, it also entails regional flexibility in order to meet local needs. Moreover, the management approach enables employees to work from another country for a maximum of 30 working days per year. Employees can choose from a variety of countries with the exclusion of locations affected by war or civil or political unrest. Other potential exceptions relate to employees who are required to work from a specific location or a non-flexible workplace due to the nature of their tasks, e.g. employees in customer-facing roles in a travel agency. In order to take account of the views and interests of its key stakeholders, TUI's employees, the Company carries out an annual employee survey. The results are used as input for the further development of the management approach. The topics addressed by the management approach are communicated separately via Smile. This channel is also used to publish changes and updates. Responsibility for the implementation and examination of the management approach in accordance with the general People Strategy lies with the Executive Board, the GEC and the HRLT.

TARGETS

For financial year 2025, the Supervisory Board defined sustainability targets for the members of the Executive Board. The target relating to Social is to increase employee satisfaction by 2 percentage points. Target achievement is measured via the results of the annual TUIgether+ survey and evaluated by the Supervisory Board. For the financial year under review, employee satisfaction matched the prior year's level.

For further details, please refer to section [II. Overview: Individual remuneration of the members of the Executive Board in the Remuneration Report](#).

ACTIONS

In the completed financial year, three global surveys were conducted in order to secure the effectiveness of the management approach. The surveys have been adjusted to different employment cycles of TUI's employees.

The TUIgether+ survey aims to collect employee feedback on general topics related to the workplace (e.g. leadership, learning and development, sustainability, wellbeing, DEI) to measure overall engagement within TUI and understand the factors impacting or driving engagement.

The Exit survey is another survey along the employment cycle of TUI employees. It is aimed at providing information about TUI Group leavers based on the respective employee's reasons for leaving, the sector they are moving to, and potential considerations that might encourage them to return. The overall goal is to gain an understanding of potential improvements to enhance employee retention.

Another survey newly launched in the financial year under review is the Business Insights survey, aimed at measuring specific key topics relating to specific groups of employees within TUI Group. In the completed financial year, perception of the communication activities for the ongoing transformation of Markets + Airline was measured. The survey was carried out in the framework of the change management activities in order to gain a better understanding of the perception of the transformation-related communication. The results of the survey will help the transformation team to continually improve its change management activities for the employees affected and hence positively impact the overall employee experience.

The surveys are addressed to TUI's own workforce. They were all carried out in the course of the financial year under review. The first Business Insights survey for Markets + Airline was launched in December 2024, while the first Exit survey was started in April 2025. The TUIgether+ survey was carried out in June 2025 and has been established as an annual process. The Business Insights survey has already been carried out twice and delivered response rates of 16 % and 14 %. Based on the results of the survey, communication has been adjusted to be better aligned to employees' needs (e.g. introduction of an AI chatbot to answer all employee questions relating to the transformation). As the Exit survey was only launched in April 2025 and the response rate in an exit-related survey is obviously lower due to the nature of the survey, evaluation of the results will require some time. The plan is to provide results at a global level in the forthcoming financial year. In 2025, the Engagement Index of the TUIgether+ survey was 80, i.e. flat year-on-year. The response rate grew by two percentage points to 77%.

Enable growth (ESRS S1-10)

MANAGEMENT APPROACH

Our Global Reward Guidelines ensure that our employees are paid according to clear, fair and competitive standards around the globe. This enhances TUI's attractiveness in the market, increases people's willingness to perform and supports an evolving corporate culture. In this way, we are laying foundations to accelerate growth and achieve our strategic targets. Uniform, lean and digital processes in TUI's Global Reward Guidelines reduce complexity and the administrative workload, creating transparency, accelerating decision-making and enhancing scalability within the organisation. Employees benefit from clear workflows and efficient access to information – while the Company benefits from greater agility, cost efficiency and sustainable growth. The management approach related to Enable Growth applies to TUI's own employees. The Guidelines were developed in the framework of a global project involving Reward professionals from all business areas. Representatives from different countries ensured that the interests of different groups were taken into account. The Guidelines are communicated directly to the Reward team in charge of implementation. While responsibility for the implementation of these Guidelines lies with the CPO, the HRLT is responsible for ensuring implementation of the Global Reward Guidelines through the Reward Teams.

TARGET AND ACTIONS

Fair salaries and benefits are firmly anchored in TUI's corporate culture via TUI's Global Employment Statement. The salaries reflect customary market rates, the cost of living and the performance and skills of employees. By paying market rates, we counter the risk of losing employees because of inadequate pay, whereupon we would have to fill the vacancies by recruiting agency staff or other externals.

METRICS

ADEQUATE WAGES

In the financial year under review, TUI paid adequate wages to all its employees.

Local Reward and HR teams identify the employee with the lowest pay category per country, taking only in-scope employees into account (and excluding, for instance, interns). The lowest wage package is used to verify whether employees are at least paid the adequate wage benchmark. If not, the number of employees whose wage falls short of the benchmark is reported and the reasons are explained.

Additional disclosures on managing impacts, risks and opportunities

TARGETS (ESRS S1-5)

The targets for TUI's own workforce are set by the respective departments and are derived from the TUI People Strategy. If necessary, employees or workers' representatives are included in the target setting process. The performance delivered to achieve the targets is tracked by the respective department. Internally, the progress is regularly communicated to the CPO and the employees, while it is externally communicated through sustainability reporting. TUI gains valuable insights from employee surveys, which help to support the progress towards target achievement.

ACTIONS (ESRS S1-4)

All actions and initiatives in place with a positive impact on TUI's own workforce are mentioned in the sections on Actions. The effectiveness of the actions is generally tracked through the targets listed above the actions. If an action is not linked with any targets, additional information on how the actions are tracked is provided in the respective chapter. The actions planned and implemented and the associated targets to track the effectiveness are described in the individual chapters. The People Strategy contains references in order to ensure that TUI does not cause or contribute to any material negative impacts on its own workforce; this also includes the Company's procurement, distribution and data usage practices. The focus is on managing and driving positive impacts on employees so as to avoid negative impacts, which currently are also immaterial. The material impacts are mainly managed by employees; the costs associated with managing material impacts are therefore difficult to break down. Dedicated DEI, Reward, Reporting and Training teams manage a large number of impacts. Major investments in relation to the actions are discussed in the framework of the financial planning.

General disclosures related to TUI's own workforce (ESRS 2, SBM-3)

All positive impacts on TUI's own workforce arise from the People Strategy and are therefore related to TUI's business and HR activities. The impacts play a major role in the development of TUI's People Strategy and business model. All measures and strategic decisions in connection with the identified impacts are described in the management approaches. Based on TUI's business model as a tourism group, general developments in the labour market and the People Strategy as the basis for the Company's approach to its own workforce, TUI relies strongly on its own employees and therefore faces the risk of increased costs to offset potential shortages of skilled workers. The strong seasonality of TUI's business contributes especially to fluctuations in the headcount and number of employees required.

All chapters in the section Own workforce relate to TUI Group's own employees. The impacts and risks described apply to all of them. Employees working for Riu Hotels & Resorts are not covered by the policies, actions or targets of the People Strategy as responsibility for these employees lies with the management of Riu Group. Riu employees are only included in TUI Group's metrics under Characteristics of employees, but are not included in the theme-specific data in connection with the partial application of the ESRS. Where Riu Hotels & Resorts employees are included in the relevant data points, this is clearly marked.

TUI's own workforce includes all people who are in an employment relationship with TUI Group as well as non-employees, i.e. self-employed people and people provided by undertakings primarily engaged in employment activities. The impacts and risks presented relate to own employees.

The activities that result in the positive impacts are covered in the description of the actions in the corresponding topic. All employees are positively affected or could be positively affected by these activities. No operations at significant risk of incidents of child or forced labour were identified as material. TUI relies on established data to highlight barriers and understand people with special characteristics and how they could be affected. Further information on that topic is presented in S1-2 Processes for engaging with own workforce and workers' representatives.

All metrics shown in the present report are subject to a Governance Model, which ensures validation and adherence to global definitions through clear roles and responsibilities in local teams and the HR leadership team (HRLT). All metrics refer to numbers of employees.

Characteristics of employees (ESRS S1-6)

Number of employees by gender

	2025		2024	
	No. of employees	in %	No. of employees	in %
Male	29,559	44.2%	28,717	43.0%
Female	37,293	55.8%	38,123	57.0%
Other	2	0.0%	5	0.0%
Total	66,854	100.0%	66,845	100.0%

This data point is defined as the total number of employees by headcount, excluding executives and interns, at the end of the reporting period, broken down by gender. This data point includes the employees working for Riu Hotels & Resorts.

Number of employees by country

	2025	in %	2024	in %
United Kingdom	11,505	17.2%	11,759	17.6%
Spain	10,250	15.3%	10,505	15.7%
Turkey	8,328	12.5%	8,375	12.5%
Germany	7,167	10.7%	7,269	10.9%
Mexico	3,660	5.5%	3,737	5.6%
Cap Verde	3,599	5.4%	3,492	5.2%
Netherlands	2,240	3.4%	2,140	3.2%
Belgium	2,131	3.2%	2,251	3.4%
Switzerland	1,820	2.7%	2,010	3.0%
Other	16,154	24.2%	15,307	22.9%
Total	66,854	100.0%	66,845	100.0%

This data point is defined as the total number of employees by headcount, excluding executives and interns, at the end of the reporting period, broken down by country for countries in which the Company has 50 or more employees representing at least 10% of its total number of employees at the end of the reporting period. This data point includes the employees working for Riu Hotels & Resorts.

Number of employees by type of contract¹

	2025			2024
	Permanent	Temporary	Seasonal	
Male	19,441	3,208	6,910	29,559
Female	26,158	4,286	6,849	37,293
Other	1	0	1	2
Total	45,600	7,494	13,760	66,854

¹ Data collection only from financial year 2025; for financial year 2024, no breakdown by employment relationships and gender is available.

This metric is defined as the total number of employees, excluding executives and interns, with permanent, temporary or seasonal contracts, broken down by gender. Measuring employees with seasonal contracts is a specific TUI metric to reflect the differentiation between employees hired to cover the increased workload during the peak season versus employees in the non-seasonal business. TUI therefore reports the number of employees with business-specific seasonal contracts instead of employees with non-guaranteed hours. This data point includes the employees working for Riu Hotels & Resorts.

Employees who have left the TUI Group

	2025			2024		
	Permanent	Temporary/ seasonal staff	Total	Permanent	Temporary/ seasonal staff	Total
Leavers	11,816	12,162	23,978	14,265	11,461	25,726
Fluctuation rate	19.2%	19.8%	39.0%	23.5%	18.9%	42.4%

This metric is defined as the total number of employees by headcount, excluding executives and interns, who have left TUI in relation to the average quarterly headcount during the reporting period. The exits considered are due to voluntary termination, termination of employment, retirement, invalidity or death, compromise agreements as well as end of temporary or seasonal contracts and other reasons. Due to the seasonality of TUI's business, the headcount increases significantly in the spring and decreases again when the holiday season moves towards autumn. This results in a high turnover rate, driven by the seasonality of the business.

Human rights obligations of TUI Group (ESRS S1-1)

TUI Group is committed to respecting human rights within its own workforce. The Group considers the protection of human rights to be of fundamental importance. Since 2014, TUI has been a signatory to the ten universally recognised principles of the UN Global Compact, including those relating to human rights and employment law. TUI condemns all forms of child labour, forced labour, slavery and practices similar to slavery.

The company believes that all employees should be treated with respect and dignity. This commitment is reflected in the Human Rights Statement and overseen by the Group's Human Rights Officer. In addition, TUI respects the International Labour Organization (ILO) principles for freedom of association and the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, the elimination of discrimination in employment and at the workplace and the right to a safe and healthy work environment. TUI also complies with the OECD Guidelines in relation to human rights and labour standards (based on the ILO principles), environmental protection, anti-corruption, consumer protection, disclosure and tax transparency.

Engaging with its own employees is fundamental for TUI Group. The Group engages with works councils in various countries as well as TUI's European Works Council, the TUI Europa Forum. Moreover, the annual TUIgether+ survey is used to gain specific insights into the perspectives of our employees.

The issue of human rights is embedded in TUI Group in a structured due diligence process and reflects our general approach to addressing the impact of human rights on our employees. This process includes clear responsibilities, annual and ad hoc risk analyses, preventive measures, accessible complaint mechanisms, remedial actions and ongoing documentation and reporting. The effectiveness of these processes is regularly reviewed and improved.

TUI conducts comprehensive risk analyses at least once a year, and whenever significant changes occur, to identify potential human rights and environmental risks within its own operations and across the supply chain. These analyses have already helped prioritise key risks based on their nature, scope and potential impact.

TUI's commitment is translated into action through a combination of policies, processes and training. Core documents such as the TUI Code of Conduct (Integrity Passport) and the Global Employment Statement set clear expectations for ethical behaviour and the fair treatment of all workers. These documents are supported by practical tools such as targeted training delivered via the TUI People learning platform, which covers areas such as human rights, child protection, and health and safety. TUI also fosters internal collaboration to embed human rights standards into day-to-day operations. Through this multi-layered approach, TUI aims to prevent human rights violations and ensure effective remedies where impacts occur.

TUI's policies regarding its own workforce align with internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights. This commitment is reflected in the TUI Group's Human Rights and Employment Statements, which outline the company's dedication to ethical and responsible business practices.

TUI Group is committed to upholding human rights and environmental standards across its operations and global supply chain. It follows the principles of the Universal Declaration of Human Rights and expects the same of its suppliers and business partners. As a signatory to the UN Global Compact, TUI integrates the latter's core principles on human rights,

labour standards, environmental protection and anti-corruption into its policies and practices. TUI also supports the Global Code of Ethics of the UN World Tourism Organisation (UNWTO), which it signed in 2012. These international frameworks help to inform the content and direction of key policy documents. TUI's policies explicitly address human trafficking, forced or compulsory labour, and child labour. These commitments are clearly outlined in the Group-wide Human Rights Statement, in which TUI condemns all such practices, including child and forced labour and slavery. TUI Group is an active member of ECPAT and has signed The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism. Corresponding policies and guidelines are implemented across business areas to support these commitments.

Processes to remediate negative impacts and channels for own workforce to raise concerns (ESRS S1-3)

TUI offers Group employees and externals the opportunity to report suspected infringements of laws or the policies anchored in TUI's Integrity Passport anonymously and without reprisals. Via the TUI SpeakUp Line, anyone aware of or suspecting an actual or potential breach of compliance caused by TUI business activities or by a TUI supplier can use the available channels to raise concerns. The SpeakUp Line is available worldwide. The system is provided and operated by NAVEX, an external provider. Apart from the SpeakUp Line, employees also report infringements through other channels, e.g. directly to their line managers or to the appropriate Compliance contact, or else use the Compliance mailbox, which is also available externally. Any incident reported through the TUI SpeakUp Line is reviewed by the Integrity & Compliance Team itself or forwarded to the department concerned for processing.

Any incidents reported through the TUI SpeakUp Line are received and reviewed by the Integrity & Compliance Team with the necessary care and professionalism. As soon as a report has been created via the TUI SpeakUp Line, the team receives the report (translated if necessary) within approx. 24 hours. The Integrity & Compliance Team carries out an initial assessment of the report, which includes a plausibility check and a decision on the next steps. The initial assessment can either lead to the initiation of an internal investigation of the reported case or to the closure of the report if there is no reason for further investigation, e.g. no evidence of infringements or misconduct. Depending on the circumstances, the report will possibly not be investigated directly by the Integrity & Compliance team and communication with the whistleblower may be passed on to the relevant department, e.g. Group Audit, Group Sustainability, Group Health & Safety, in accordance with internal procedures and risk responsibility. The persons entrusted with the implementation of procedures must be impartial and independent, not bound by instructions and committed to maintaining confidentiality. In the financial year under review, the effectiveness of the Compliance management system was audited. The audit did not give rise to any findings on the SpeakUp Line.

Information about the TUI SpeakUp Line is communicated internally and externally through various channels, such as the website and the intranet. The information channels are used to communicate all relevant information on the process and system functions. So as to give as many people as possible access to the whistleblower system, incidents can be reported through an online service, by telephone and via mobile devices.

Information on the use of the TUI SpeakUp Line and the reports received is presented in the section Incidents, complaints and severe human rights impacts. TUI treats every report of a potential compliance violation in good faith and protects the identity of the whistleblower. Moreover, reports can be submitted anonymously. Regardless of whether the report turns out to be valid, the whistleblower will not be subject to retaliatory or disciplinary action or to any other adverse consequences. In accordance with Directive (EU) 2019/1937, TUI Group's Integrity Passport states that no form of retaliation against whistleblowers, including threats, will be tolerated. This also applies to third parties associated with the whistleblower, such as colleagues and relatives, who could suffer retaliation in a work-related context, as well as individuals who have supported a whistleblower in the reporting process.

Incidents, complaints and severe human rights impacts (ESRS S1-17)

Total number of incidents of discrimination, including harassment	6
Total number of incidents and complaints filed through the SpeakUp Line for employees to raise concerns in the reporting period	51
Total amount of fines, penalties and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	0
Number of severe human rights incidents connected to TUI's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration of Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises	1
Total amount of fines, penalties and compensation for damages for the incidents described above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	0

Processes for engaging with own workforce and workers' representatives (ESRS S1-2)

Engagement with its own workforce, either direct or indirect, plays a major role at TUI. TUI regularly engages with works councils in various countries as well as TUI's European Works Council, the TUI Europa Forum. In Germany, employee representatives also sit on the Supervisory Board of TUI AG, TUI Deutschland GmbH and TUIfly GmbH. Engagement with the works councils takes place at the local level within the different legal entities, as well as at the national and European levels. The works councils usually meet once a month. In addition, meetings on specific topics are held as needed.

The CPO is responsible for engaging with the workforce. She leads the Labour Law & Labour Relations team at Group level, which manages the relationship with the TUI Europa Forum and the German Group Works Council. Additionally, there are experts in various countries who handle local workforce engagement. Currently, there is no specific Global Framework Agreement with workers' representatives on human rights.

TUI monitors workforce engagement in the framework of the annual TUIgether+ survey. Agreements between works councils and unions are made and reviewed several times a year on various topics that concern TUI's workforce. TUI relied on established data (e.g. McKinsey's DEI reports and World Economic Forum findings), highlighting barriers for groups such as ethnic minorities, people with disabilities and LGBTQ+ colleagues. TUI also engaged with their Employee Networking Groups in order to obtain insights from dialogue with those employees and from the DEI ambassadors, who provided feedback on recurring themes such as microaggression and career progression barriers. Moving forward, TUI will continue to engage with the DEI ambassadors, the Global DEI and Wellbeing Colleague Forum and will utilise data gathered from the global DEI data project.

Workers in the value chain (S2)

Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)

The table below provides an overview of the results of our double materiality assessment in relation to material impacts, risks and opportunities for matters relating to workers in the value chain. These findings are increasingly incorporated in TUI's strategic alignment, e.g. by developing measures to improve working conditions and promote social standards among partners and suppliers. Taking account of these impacts is strategically relevant for TUI as it forms the basis for a responsible and future-proof business development.

S2 Workers in the value chain

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Working conditions	Negative impact	Short-, medium- and long-term	Upstream and downstream value chain	Precarious working conditions such as seasonal employment, precarious employment relationships, inadequate wages, limited working time arrangements and a lack of freedom of association or options for collective bargaining may potentially impair the social protection, professional development and equal opportunities of TUI employees in the tourism value chain.
Equal treatment and opportunities for all	Negative impact	Short-, medium- and long-term	Upstream and downstream value chain	Unequal treatment of employees – e.g. through discriminatory practices or non-respect of equal pay for work of equal value – may potentially result in structural discrimination and a limitation on equal opportunities for TUI employees in the tourism value chain.
Child labour and forced labour	Negative impact	Short-, medium- and long-term	Upstream and downstream value chain	The potential abuse of child labour and forced labour may result in severe human rights violations and massively impair the physical, mental and social development of people affected – with far-reaching consequences for due diligence concerning human rights and social responsibility within TUI's tourism value chain.

Numerous external employees work in TUI's value chain, delivering activities required to perform tourism services. Potential impacts relate, among others, to employees in partner hotels, airlines, cleaning companies, transport companies, IT service providers, local travel agencies and restaurants and catering establishments, e.g. supplying food for hotels and cruise ships. Working conditions for these groups vary substantially, depending on the region and industry. Anyone in a contractual working relationship with our suppliers falls under the term 'workers in the value chain'. Due to TUI's business model, most of these people work in the upstream value chain.

Employees in an employment relationship with TUI are covered in Chapter Own workforce (S1). As a rule, the workers covered here work at the premises of the supplier in question. In some instances, however, such as staff employed by cleaning companies or other service providers, they work on TUI premises.

TUI recognises that its business activities may affect the human rights of workers in the value chain. The annual analysis of risks relating to the supply chain identified hotels, restaurants, transportation and local agencies as particularly relevant segments making key contributions to the delivery of tourism services. Main risks related to child and forced labour exist particularly in regions with limited social and labour law frameworks. These include, among others, parts of North Africa, the Middle East, as well as selected Asian destinations where tourism services are provided or procured. These risks primarily affect workers in hospitality, food service, transportation, and local agencies and are often structurally driven. They are closely linked to sector-specific challenges in the tourism industry and the respective regional circumstances. TUI responds to these challenges with targeted measures such as capacity-building for suppliers, training in employment rights, and partnerships with local stakeholders to promote human rights standards and minimise structural risks.

Managing impacts, risks and opportunities (S2-1)

TUI has a Group-wide management approach in place to implement human rights and environmental due diligence obligations in the supply chain. This approach also serves the corporate due diligence process, with structured procedures for analysing risk, assessing suppliers and deriving appropriate measures. TUI is committed to respecting internationally recognised human rights, including workers' rights, and environmental standards within its supply chain throughout its global operations. This integrated approach systematically identifies, prevents, and mitigates potential negative impacts. The approach aligns with the requirements of, among others, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In addition, TUI has signed the UNWTO Global Code of Ethics for Tourism. TUI's concept of human rights explicitly addresses human trafficking, forced labour and child labour. These aspects are firmly anchored in Group-wide risk analysis and due diligence.

The management approach also takes account of the requirements of the German Supply Chain Due Diligence Act (LkSG). The Chief Sustainability Officer officially acts as TUI Group's Human Rights Officer and oversees all related processes and actions. Implementation is supported by the central Supply Chain Due Diligence Committee and by a coordination unit within the Group Sustainability department. If necessary, additional internal stakeholders are involved, while external stakeholders' views are considered indirectly through multi-stakeholder initiatives.

TUI's Human Rights Statement serves as a central reference for the Group-wide management approach in implementing the duties of due diligence with regard to human rights. In the Statement, TUI commits to respect human rights both internally and along its value chain. The Statement refers, inter alia, to the principles of the UN Global Compact, the ILO standards and the requirements of the TUI Code of Conduct for Suppliers (The Code). The Statement sets out expectations relating to human rights-related behaviour in the supply chain and explains the underlying concept of due diligence. It applies both to TUI's own operations and to the Group's supply chain. It is reviewed on an annual basis, adjusted if necessary, and adopted by the Executive Board.

TUI does not maintain any direct contractual relationships with value chain workers. Instead, all suppliers must undertake to comply with the standards defined in TUI's Code of Conduct for Suppliers and also to ensure that their own business partners comply with these requirements. The Code sets out the binding framework for TUI's ecological, social and ethical expectations for the entire supply chain. Among other things, it prohibits child labour, forced labour and human trafficking, observes environmental and health and safety standards, calls for employees to be treated with respect and complies with data privacy and health and safety requirements. Responsibility for the Supplier Code of Conduct lies with Group Purchasing, and it was approved by the Executive Board.

TUI has, moreover, adopted a Group Policy on Diverse, Sustainable and Ethical Sourcing. This defines criteria for the purchasing process considering diversity, ethics, and sustainability in supplier selection. The Policy defines objectives in various fields, including lower energy consumption, fair and socially acceptable working conditions and diversity in the supplier base. In this way it supports implementation of human rights and sustainability-related requirements in sourcing activities. Responsibility for the Policy lies with Group Purchasing, and it was approved by the Executive Board.

Based on these, a list of questions has been drawn up for the purchasing system, and these must be answered by all suppliers in the selection process. It was revised in the financial year under review and includes questions relating to compliance with ethical standards as well as labour and human rights.

In addition to these actions in relation to sourcing practices and internal processes, TUI places importance on cooperating with other stakeholders in industry initiatives and building supplier competence. This is outlined in greater detail in section S2-4.

In the period under review, a total of four cases were reported in which value chain workers had been affected by potential non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises. In the financial year under review, no severe problems or incidents occurred in relation to human rights.

Processes for engaging with value chain workers about impacts (S2-2)

The processes for engaging with value chain workers about impacts are part and parcel of the Group-wide due diligence process, which falls under the responsibility of the Human Rights Officer.

As part of its risk management procedure, TUI performs structured risk analyses to identify any risks to human rights or the environment in its own business operations and along its supply chain. These analyses are carried out annually and ad hoc in the event of material changes to the risk profile.

Working conditions and potential impacts on the human rights of value chain workers are central to this analysis. Risks for workers – e.g. relating to fair wages, working hours, freedom of association or health and safety – are systematically taken into account in the identification and assessment of human rights-related risks.

An IT-supported risk management tool plays a key role in this respect. It facilitates holistic assessments along the value chain, taking account of direct and – wherever information is available – indirect suppliers. Based on recognised indices and external sources, an abstract human rights and environmental risk is determined for each company. This risk is subsequently rated "low", "medium" or "high". In a second step, the risk is specified in greater detail based on self-assessments, audit results or further insights from the supplier relationship. This process provides indirect insights into impacts on value chain workers. Through direct dialogue with suppliers – such as requests for evidence or self-disclosure – it also incorporates the perspective of those working for suppliers. This process serves simultaneously to analyse suppliers with a view to obligations of due diligence in relation to human rights and the environment.

In order to engage with value chain workers indirectly, TUI requires all business partners to comply with a Supplier Code of Conduct which defines fundamental criteria regarding human rights, working conditions and environmental protection. The inclusion of appropriate clauses in contracts allows TUI or third parties mandated by TUI to conduct compliance audits.

The whistleblower system – publicly accessible via the Company's website, enables structured engagement with value chain workers. The option to report incidents – even anonymously – permits direct exchange with the individuals concerned. This helps to detect impacts on workers early and to derive targeted measures to improve working conditions.

TUI also engages in multi-stakeholder initiatives to incorporate the perspectives of potentially affected groups – in particular value chain workers – when updating measures and standards. Examples include TUI's membership in Futouris e. V., a sustainability initiative for the tourism sector, as well as in ECPAT Deutschland, an organisation for the protection of children against sexual exploitation in tourism.

Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

TUI Group commits to identifying, remediating and preventing human rights and environmental risks along the value chain. Workers who are affected by or aware of any incidents can raise their concerns at any time, even anonymously. Access to the electronic whistleblower system and information for third parties is published on the website at <https://www.tuigroup.com/en/compliance> and therefore accessible regardless of where the person is directly employed. Providing an anonymous reporting option is intended to strengthen trust in the whistleblower system. In addition, suppliers receive information on the whistleblower system along with their contract documents and are requested to pass that information on to their workers. Currently, no additional structural measures or processes are implemented to actively promote awareness of the whistleblower system. Nevertheless, the system is considered to be generally accessible as it is used by value chain workers.

For more detailed information about the whistleblower system, please refer to the section [Management approach 2: Whistleblower protection](#) in the chapter on Governance (G1).

If any material negative impacts on value chain workers are identified, the cases are followed up in close cooperation with the relevant suppliers. The goal is to identify the root causes and implement appropriate measures to remedy the grievances. If the supplier is not prepared to cooperate, contractually agreed measures are initiated. If these measures do not lead to any substantial progress, the business relationship may be suspended or even terminated.

Taking action on material impacts on value chain workers (S2-4)

TUI has introduced a range of measures to promote humane working conditions along the entire value chain, aiming to prevent, avoid or appropriately reduce any material risks identified. The effectiveness of these measures is regularly reviewed in order to ensure that the targeted positive effects for value chain workers are actually delivered. The assessment includes monitoring training participation and analysing reports and complaints. The results are incorporated in the further development of the actions. Unless otherwise specified, all measures are implemented on an ongoing basis.

In order to strengthen people's awareness for human rights and labour standards and build capacity, suppliers can access a Human Rights Toolkit designed to help identify human rights risks and implement appropriate mitigation measures. This toolkit includes information on working conditions, discrimination as well as child labour and forced labour. It offers assistance in implementing preventative measures within the undertaking in order to improve labour standards for value chain workers. The toolkit is publicly accessible on the TUIPartner website and is reviewed annually.

In addition, the industry initiative Futouris offers an e-learning programme on Human Rights in Tourism. This programme has been available free of charge to direct partner companies or tourism providers since January 2025. It provides fundamental information on legal requirements governing human rights and presents practical examples of ways to prevent risks such as precarious working conditions, unequal treatment at the workplace as well as child and forced labour. Suppliers will find information on the programme and a link to the e-learning scheme on the TUIPartner website and can share this content with their workforce. TUI is planning to implement a communication campaign for its direct suppliers in the new financial year. The programme will contribute to implementing measures against material negative impacts on value chain workers, e.g. by means of capacity-building for suppliers and cooperation with industry peers.

Training programmes on protecting children, human rights, health and safety, and integrity are available across the Group via TUI's People Learning platform. The offering is complemented by specific training programmes, e.g. on children's well-being for entertainment and childcare staff or on the Modern Slavery Act for purchasing and procurement teams. The

goal of these training programmes is to raise people's awareness for human rights risks and provide practical skills for handling relevant situations. Based on specific case studies, employees learn how to recognise potential grievances – including grievances affecting value chain workers – and report and follow up on corresponding incidents in a responsible manner.

Human rights and environmental requirements have been systematically incorporated in contracts with suppliers. These contractual clauses create a binding basis for responsible action along the supply chain. TUI regularly reviews these requirements, at least once a year, and updates them as needed to reflect new insights or regulatory changes.

Recognised, credible sustainability certifications are used to assess compliance with sustainability standards. A certified standard in line with the criteria of the Global Sustainable Tourism Council (GSTC) was developed for providers of activities and excursions. It obliges the providers to disclose information on fair wages, working hours, child protection and local employment.

TUI also actively engages with industry initiatives and partnership schemes to tackle systemic supply chain challenges jointly with other stakeholders, ensuring lasting improvements for workers.

TUI draws on risk analysis and current developments in the tourism sector to identify any measures required. The measures are selected and prioritised based on the materiality of the identified risks and the possibility of exerting influence. In the event of material negative impacts, TUI ensures the availability of processes to implement or facilitate remedies.

[For a more detailed description of these processes, please refer to section Processes to remediate negative impacts and channels for value chain workers to raise concerns \(S2-3\).](#)

In order to ensure the effectiveness of these processes, feedback mechanisms, such as the whistleblower channel, are regularly evaluated. The implementation and outcome of the remedies are documented and incorporated in the further development of the processes.

Human and financial resources are available to manage material impacts. Responsibility lies with the Group Sustainability department, working in close cooperation with Purchasing, Compliance and other relevant functions. Provision of these resources allows the systematic implementation and further development of the measures to respect human rights in the supply chain.

Targets related to value chain workers (S2-5)

A key concern is to comply consistently with the due diligence obligations in the supply chain and all relevant legal requirements. In this context, the working conditions of value chain workers have shifted increasingly into focus. The effectiveness of the concepts and measures is reviewed annually in the framework of the due diligence process and adjusted as necessary.

To date, no formal quantitative targets have been defined for this stakeholder group. TUI is currently examining whether corresponding targets can be formulated for future reporting cycles in the framework of the further development of the human rights-related risk management system.

Consumers and end-users (S4)

Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)

The table below provides an overview of the results of our double materiality assessment in relation to material impacts, risks and opportunities (IROs) for issues in connection with consumers and end-users.

S 4 Consumer and end-users

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Health and Safety	Positive impact	Short-, medium- and long-term	Own operations	TUI's comprehensive health and safety as well as quality standards across all businesses secure the quality of products and services and have positive short-, medium- and long-term impacts on the customer experience.
Health and Safety	Risk	Short-, medium- and long-term	Own operations	TUI faces a risk of legal, financial and reputational consequences if quality or health and safety standards for all products and services are inadequate.
Security of a Person	Positive impact	Short-, medium- and long-term	Own operations	With its safety and security management and package tour offering, TUI facilitates a safe and plannable travel experience for the short, medium and long term.
Security of a Person	Risk	Short-, medium- and long-term	Own operations	Safety and security risks in destinations may result in customer complaints, reputational loss and economic disadvantages in the short, medium and long term.

Material impacts, risks and opportunities in relation to consumers and end-users (SBM-3)

The focus of our organisation is on our guests and customers with their individual wishes and needs – our ambition is to offer them differentiated and consistent experiences. Our integrated business model enables us to support our customers along the entire customer journey, from the booking and the trip to the destination, the stay in the hotel or on board the cruise ship through to local activities and excursions – both via digital channels and in person. The digital travel experience is complemented by personal support from our employees, which our customers experience in our travel agencies, aircraft and hotels, during tours and experiences, aboard our ships and in the destinations.

Our focus in all operating businesses is on an attractive and safe customer experience. In this regard, the health and safety of our customers plays a key role for us. Due to our integrated business model, we believe these areas create material positive impacts on our customers: effective safety and security management enhances customer satisfaction and may create a competitive edge. TUI is therefore committed to the health, safety and security of customers at all stages of the value chain. This is achieved, for example, by continually monitoring and assessing safety-critical developments in the destinations through regular reviews of accommodation, activities and transport providers as well as specific monitoring protocols for outbreaks of disease. This enables TUI to identify safety risks early on and discuss and initiate response measures with its own tour operators and other business areas involved. In order to secure the quality of the entire customer journey, TUI offers customers multiple digital and physical touchpoints, thereby delivering a strong blend of digital and human interaction.

Impact of the perspective of customers on strategy and business model

As our guests and customers are the focus of our business model, the views, interests and rights of our customers are incorporated when adapting and developing our strategy and TUI Group's business model in the form of feedback on our product and services portfolio.

By capturing the Net Promoter Score (NPS)¹ across all markets and brands, we continually gauge and evaluate our customers' satisfaction. In financial year 2024, this indicator was included in the remuneration system for the TUI AG Executive Board as an individual remuneration component for the first time. In financial year 2025, it was again included as a remuneration component for all Executive Board members.

¹ The NPS score is captured in questionnaires relating to customer satisfaction. It is based on the question "On a scale of 0 to 10, how likely are you to recommend the brand to a friend, colleague or relative?" with 10 being "extremely likely" and 0 "not at all likely". The score is measured by the share of promoters (scores 9 and 10) less the share of detractors (scores 0 to 6).

Customer feedback received in delivering services is also taken into account. In health and safety, for instance, we operate a reporting system to record all observed incidents and those reported by customers. These incidents are subsequently examined by the Group Safety & Risk team, resulting where necessary in appropriate measures. When a customer reports a problem following the delivery of a service, this is also forwarded to the Group Safety & Risk team, who examine the incident and initiate further measures as required.

The insights from customer feedback and the reporting systems may provide indications of potential weaknesses, which are taken into account in evaluating Company-specific risks.

The risks determined as material by TUI Group are directly associated with the tourism business model. Our ambition is to make travel safer, in particular by providing package tours that offer customers seamless support. If we fail to meet our own standards, this may potentially result in customer dissatisfaction, reputational damage or litigation costs.

Against this backdrop, it is essential for TUI Group to recognise and respect the individual needs of its customers, regardless of their origin, the circumstances of their lives, or the travel product chosen. TUI Group's ambition is to guarantee the personal rights, safety and data privacy of all customers, taking into account any individual needs such as the needs of children or persons with limited mobility. The positive impacts of our products and services expressly affect all customers, irrespective of the product or service they purchase and the country where it is purchased.

Customer range

TUI offers tourism and leisure services for different customer groups, in particular solo travellers, couples, families and groups. These customer groups have different needs and expectations, which TUI meets through tailored offerings and services.

This diversity of individual offerings reflects TUI's 'Live Happy' brand promise. It defines an ambition that goes beyond the pure travel experience. TUI's goal is to support customers' wellbeing in the long run by means of safe and healthy products and services. Our products and services are not harmful to people and do not increase the risk of chronic disease.

Apart from the physical wellbeing of our customers, we attach great importance to protecting their personal rights and freedoms. Use of our services does not entail the risk of material negative impacts on the right to privacy, the protection of personal data or the right to freedom of expression and non-discrimination. We take care to ensure that we comply with all requirements of the General Data Protection Regulation (EU GDPR).

In the interest of a holistic understanding of responsibility, TUI Group focuses not only on protecting personal data and rights, but also on providing transparent and reliable information to consumers at any time.

Under EU consumer protection law, travel services can be considered services for which consumers need accurate information in order to avoid any potentially harmful use or misguided decisions. TUI Group therefore provides comprehensive information to its customers prior to conclusion of a contract, e.g. a detailed description of the service, visa requirements, health indications or rights in the event of cancellation. Consumer rights also apply while they use the travel services, based on the need to provide timely and accurate information to travellers, e.g. safety instructions on flights or guidance for how to behave in the event of a fire in a hotel. In order to ensure that this service-related information is available to all customers, TUI Group instructs its employees across the Group on how to comply with internal rules and on health, safety and security procedures.

In managing the impacts, TUI also takes account of the needs of particularly vulnerable groups such as children and persons with disabilities. As a rule, TUI Group subsidiaries provide information and advice for these groups on their own websites in order to make their travels easier. Special safety equipment for children and infants is available on board our planes and ships. Specific procedures and support are available for people with disabilities, e.g. when they board transport or wish to select an accessible holiday.

TUI's comprehensive quality standards aim to deliver consistent operational workflows, ensure our customers' wellbeing and strengthen their positive holiday experience. The goal is to reinforce people's trust and enhance customer satisfaction.

For more detailed information, please refer to the section [Actions on material impacts on consumers and end-users \(S4-4\)](#).

The risks we have identified in the framework of our double materiality assessment can potentially arise from all customer groups. However, we believe that the risks are, in particular, associated with customers using services outside TUI's direct sphere of influence or travelling to regions with issues of relevance to security (countries with weak local and statutory rules and regulations and / or particular risks of terrorism or other Security, Health & Safety risks).

Managing impacts, risks and opportunities

Policies consumers and end-users (S4-1)

HUMAN RIGHTS POLICY COMMITMENTS – MONITORING AND PREVENTION

TUI Group commits to respecting human rights and ecological standards in all parts of its global value chain. Human rights are inextricably linked with our customers' health and safety, security and wellbeing: fair working conditions for service providers, strict sanitary standards in accommodation facilities and responsible leisure-time offerings aim to build trust and ensure safety and security during the holiday. Protecting human rights is therefore firmly anchored in TUI's Human Rights Statement. As a global provider of holiday experiences, it is our responsibility to ensure that our services are delivered in an ethical, sustainable manner based on respect for human rights. In this way, we seek to ensure the quality of our portfolio, strengthen people's trust in our brand and promote long-term customer relationships.

Since 2014, we have pledged to respect the principles of the UN Global Compact in the fields of human rights, labour standards, environmental protection and anti-corruption. We are mindful of laws and international standards, combat human rights violations and discrimination and champion diversity and inclusion. This applies in our dealings with all our employees and directly impacts our dealings with customers. Accordingly, TUI Group's policies and guidelines relating to customers reflect the principles of the UN Global Compact.

Responsibility for TUI's commitment relating to human rights protection lies with different individuals and departments, including, in particular, the Human Rights Officer, Integrity & Compliance, Risk Management, Purchasing and HR. A risk management tool is used to identify potential risks. For more detailed information, please refer to TUI AG's Report on the German Supply Chain Due Diligence Act (LkSG) for financial year 2024. The Company is not planning to update the report for 2025.

For the Report on the German Supply Chain Due Diligence Act, please refer to <https://cdn.sanity.io/files/b6xulh2p/production/e035860eb581e65591778ed0bfc4c8ab90903d9.pdf>

In order to prevent any infringements, TUI Group has launched preventive measures including the Integrity Passport – TUI's Code of Conduct – and carries out regular training programmes. Potential infringements can be reported via the TUI SpeakUp Line. Remedial measures are taken on a case-by-case basis and are disclosed in the annual LkSG reporting.

Enshrined in TUI's Human Rights Statement is a commitment to always ensure that we keep the perspectives of potentially affected groups and other relevant stakeholders in mind. TUI engages in constant dialogue with customers via the TUI Speak-up Line and other channels.

For further information, please refer to the chapter [Business Conduct \(G1\)](#)

HUMAN RIGHTS POLICY COMMITMENTS – INFRINGEMENTS AND CONSEQUENCES

In the framework of the double materiality assessment, no negative impacts of TUI Group's services on human rights were identified, either in the supply chain, nor in its own business operations or in relation to guests. Should TUI gain knowledge of possible human rights violations associated with TUI or any of its direct and indirect business activities, remedial measures will immediately be taken. In the event of violations in its own business operations, TUI implements direct remedial measures, including the use of defined processes and labour law measures such as warnings and termination. In its supply chain, TUI works with suppliers, uses its influence and contractual measures, and may suspend or terminate business relationships in the event of a lack of cooperation. Processes and monitoring in relation to TUI's own business operations include appealing to managers to comply with the Integrity Passport and adapt their behaviour accordingly, while a similar approach is taken vis-à-vis indirect suppliers in the supply chain. The measures are reviewed and further developed on a regular basis, at least once a year. TUI also engages in industry initiatives to promote sustainability in the supply chain, such as Futouris e.V. These measures are aimed at quickly dealing with violations in the supply chain and in relation to customers and monitoring the effectiveness of the processes.

In financial year 2025, a total of six incidents of potential human rights violations related to consumers and end-users were reported through the whistleblower system. These cases concerned our own business activities as well as the supply chain. All reported incidents were investigated in accordance with our internal guidelines. Our Human Rights Statement and the Whistleblower System Procedure are publicly accessible.

Management approach related to health and safety

CONTENTS

Managing our customers' health and safety is based on a range of process instructions aligned to the specific characteristics of the business areas. The policies aim to guarantee the health and safety of all customers to the largest possible extent. They are structured to maximise the positive safety-related impacts of TUI's products and services on customers. At the same time, they are to mitigate the financial risks associated with providing unsafe experiences that might jeopardise the health or safety of our customers. TUI Group's health and safety management covers both our own business operations and the services provided by business partners and suppliers.

In managing its own business operations, TUI's ambition is to ensure that all internal processes and customer interactions comply with quality and health and safety standards. Specific guidelines apply to certain segments such as Hotels & Resorts, governing aspects such as balcony rail height, fire prevention protocols, activities for children and safety by the pool or at the beach. In addition, there are guidelines for excursions, including for the safe transportation of passengers to and from excursions and the overall safety of TUI Musement experiences. In Cruises, health and safety aspects relating to our customers are already governed by comprehensive national and international statutory provisions and written agreements with third parties so that no additional internal policies have been introduced. The existing rules cover, for instance, port calls, shore excursions and procedures to deal with incidents and illness. In Airline, there are also strict national and international statutory rules and regulations. In TUI Airline, operational manuals governing various sub-aspects of flight operations guarantee compliance with the strict legal provisions and hence ensure our customers' health and safety. TUI continually implements monitoring mechanisms such as regular visual and functional tests in order to ensure that the health and safety policies are consistently met by all business areas. This process is complemented by regular checks by Group Safety & Risk Management, carried out to ensure that any new weaknesses are identified and included and that controls remain effective in the long run. This structured risk management approach underpins TUI's commitment to providing a safe environment for all customers and stakeholders.

TUI's Supplier Code of Conduct frames the management of business partners and suppliers. It governs the contractual relationships with all suppliers throughout the Group and also sets out minimum health and safety standards and rules for our customers. It ensures that suppliers comply with our requirements. This is especially important as our customers can be in direct contact with many third-party providers on their journey, e.g. hotels or experience providers. In combination, these policies ensure a seamless, safe customer experience.

SCOPE

Management of the health and safety aspects of TUI's own operations is assigned to the individual business areas in order to take account of the particularities and special requirements of the individual businesses. Some policies, for instance, only apply to hotel operations, excursions, transfers, cruises, or the handling of accidents and illness. Certain areas, e.g. Airline and Cruises, are by now so thoroughly subject to laws and international third-party standards that additional internal health and safety policies are not required. Specific information is provided for special stakeholder groups, e.g. children or people with disabilities, to facilitate accessible travel experiences for these customers. If non-TUI Group airlines are used to carry out flights or excursions, these airlines are examined by the Group Safety & Risk team. Depending on the type and outcome of the pre-operational examination, the checks are repeated at regular intervals ranging from six months to two years. In Airline, a variety of evaluation methods apply.

The Supplier Code of Conduct for TUI Group suppliers universally applies to all contractual partners of the Group. It is used by TUI AG and all companies in which TUI AG directly or indirectly holds a majority stake, whether in Germany or abroad. It also applies to joint ventures and other associated companies, even those over which TUI AG does not have management control, and thus establishes minimum health and safety standards for all business relationships. The Supplier Code of Conduct also obliges direct suppliers of TUI Group to pass on the values and requirements set out in the Code to their sub-contractors and monitor compliance with the requirements by these companies. Our health and safety management system performs risk assessments varying in scope on all suppliers. If a sub-contractor does not comply with the requirements, the reasons must be explained and the supplier has to consider switching to a different sub-contractor.

Overall, these policies ensure a uniform health and safety management approach for the entire value chain covering TUI's own operations, its suppliers and downstream partners, aiming to ensure the wellbeing of customers and employees.

RESPONSIBILITY

TUI's centre of excellence Group Security, Health, Safety & Crisis is responsible for defining the safety and hazard management programmes and aims to pursue a uniform, consistent approach within TUI Group. In line with requirements, responsibilities can be delegated on a case-by-case basis. The Group Director SHSC provides regular reports to the GEC or to the Board member in charge of HR. Group SHS is accountable to the stakeholder groups it represents via the Group's SHS Governance Committee.

EXTERNAL STANDARDS

In addition to the principles of the UN Global Compact in the fields of human rights, labour standards, environmental protection and anti-corruption, TUI has also signed up to the UNWTO's Global Code of Ethics. Due to a lack of internationally recognised standards for travel and tourism, TUI's health and safety standards are largely aligned to ABTA's Tourism Health & Safety Technical Guide. Our cruise brand Marella strictly follows third-party standards, e.g. those of the International Maritime Organization (IMO), the International Convention for the Safety of Life at Sea (SOLAS), the Cruise Lines International Association (CLIA) and the International Safety Management Codes (ISM Codes). These conventions and associations formulate extremely stringent rules for cruise passenger health and safety. In TUI Airline, TUIfly has already received IOSA certification (IATA Operational Safety Audit) in Germany. This voluntary certification is an internationally recognised safety standard in aviation and usually meets higher criteria than statutory safety and quality requirements. At the same time, IOSA offers a uniform organisational framework within which TUI Airline aims to obtain certification for its other regional airlines as well.

STAKEHOLDER INTERESTS

In the field of health and safety, customers' interests are for the most part covered indirectly by local regulatory requirements or the standards defined or applied by TUI. Customers additionally have various communication channels available to inform TUI Group of their needs and interests, so that TUI can take these into account.

COMMUNICATION

All employees can access the Supplier Code of Conduct and other safety information and instructions via our intranet Smile. For external users, the information is provided to our business partners via our TUI Partners website or attached to the contract documents. Travel and safety information relevant for an activity is provided to our customers during the booking process and during use of a product or service.

Management approach related to personal safety and security

CONTENTS

TUI Group implements appropriate guidelines in its various business areas that are tailored to the specific requirements of each area and conform with our Group-wide management approach to customer safety. They govern operations in TUI's own hotels and resorts, in third-party hotels and during excursions, activities and tours. TUI's safety management system defines our global safety strategy, the application of our risk-based, data-driven approach and the specific measures to be taken by each TUI business in relation to the products and services offered under the supervision and aegis of TUI Group SHS. Our SHS approach ensures that the focus is placed on the areas of greatest risk with the aim of minimising the likelihood and/or severity of an incident so as to prioritise the safety of customers in the destinations. This focus minimises the financial risks associated with safety-related incidents and plays a key role in making travel safer overall. Through proactive risk management, TUI aims to offer a safe travel experience, reducing the hazards associated with travel for every customer.

TUI's overall ambition is to set standards in terms of travel safety and enhance safety in the destinations, not just for its own customers but for the entire sector. By taking account of safety aspects in our business operations and partnerships and by implementing risk management practices, we hope to make continual progress towards achieving our target of safer travel for all.

SCOPE

TUI's risk management programmes for safety and hazard control take account of the local circumstances under which a product or service is offered, external factors such as local laws to be adhered to as minimum standards, and international best practice. Maintaining a uniform global approach, TUI implements additional guidelines and management approaches in order to optimise the management of certain situations. Our approach focuses on key risk areas in connection with accommodation, transport and activities. Depending on the business area at stake, additional policies and management approaches are implemented to manage situations in line with requirements. Our hotel policies focus on maintaining high safety standards in TUI's own hotels, hotels operated under management contracts or managed under the TUI brand in order to ensure the safety of customers and employees as well as the integrity of our brand. For third-party hotels, TUI implements strategic minimum requirements relating to safety, including risk assessments and quality

assurance processes, in order to ensure that the safety standards correspond to those applied in TUI's own accommodation. Cruises and Airline are governed by strict international rules and regulations, ensuring personal safety and security in implementing transport services.

RESPONSIBILITY

The Executive Board of TUI AG and the Group Executive Committee set the strategic direction and supervise the appropriate handling of personal safety and security in the Group. Group SHS is responsible for TUI's safety and security risk management. This body ensures safeguards the resources for safety and security risk management and advises the Executive Board in safety and security-related matters. TUI Group Security is in charge of TUI's security strategy and management. The function is responsible for the development and revision of security manuals, policies and specification, the establishment of minimum security requirements and reviews of the Group's security practices. It also supports the source markets and destination management in implementing and monitoring compliance with the safety and security risk management framework.

EXTERNAL STANDARDS

When it comes to safety and security information, priority is always given to government travel advice, which serves as a point of reference and basis for all assessments of a given country. The Cruises segment additionally makes substantial use of third-party standards such as those of the International Maritime Organization (IMO), International Convention for the Safety of Life at Sea (SOLAS), Cruises Line International Association (CLIA) and International Safety Management Codes (ISM Codes). All of these conventions and associations have strict rules governing the safety and security of passengers on cruises. In Airline, safe flight operations are ensured by a comprehensive policy based on strict statutory regulations and rules defined by TUI which set the bar higher. Implementing these rules is aimed to guarantee the health, safety and security of passengers.

STAKEHOLDER INTERESTS

In the field of health, safety and security, most customers' interests are covered indirectly by local regulatory requirements or the standards defined or applied by TUI. Customers additionally have various communication channels available to inform TUI Group of their needs and interests, so that TUI can take these into account.

COMMUNICATION

As a leading tourism group strongly committed to quality and safety, TUI regularly reviews all policies and instructions. Internally, the framework is provided to all stakeholders via our intranet Smile and the TUI Security Knowledge Hub, while it is provided externally via our TUI Partners website.

Processes for engaging with consumers and end-users about impacts (S4-2)

Type, frequency and responsibility

TUI Group engages in dialogue with its customers and business partners, governments, authorities and the general public. As part of that process, TUI absorbs external perspectives. These can help in the further development of safety and quality standards.

TUI Group companies use different channels to contact customers and obtain their direct feedback. This dialogue supports customer retention and helps to further improve quality and safety standards. Group Security, Health, Safety & Crisis uses the direct feedback obtained from customers in order to identify potential risk areas. This is part of our strategy of developing a data-driven approach for safety and security risk management. We use our internal data sources Qualtrics and Watchtower as well as external data for our analysis, focusing on our accommodation, destination and product types.

For more detailed information on the feedback channels, please refer to [Channels for consumers and end-users to raise concerns \(S4-3\)](#).

Our customers essentially have the opportunity to reach us quickly at any time. In particular after the booking or during the trip, we are in regular dialogue with customers so as to ensure their continual involvement. After the trip or use of a travel component, at the latest, we ask our customers to provide a review. Customers are free, meanwhile, to limit the frequency of our contacts.

Operational responsibility for dialogue with our customers first and foremost rests with the employees concerned in Airline, Cruises, Hotels & Resorts and Musement. At the top management level, the Executive Board of TUI Group is

responsible for incorporating customer perspectives into TUI Group's business model. This ambition is reflected by using customer satisfaction as expressed in the NPS as a parameter for Board remuneration.

For further details about ESG factors reflected in Board remuneration, please refer to the [Remuneration Report](#).

By using NPS (an indicator of willingness to recommend) and CSAT (Customer Satisfaction Score)¹, TUI monitors the effectiveness of all customer-related initiatives. The scores for all source markets are provided on a weekly basis.

TUI carries out regular surveys in order to gain a better understanding of the needs and wishes of its customers. The results help to further improve our services, increase customer satisfaction and ensure that all customer groups, including children and people with special needs, are taken into account. The communication channels used for that purpose are described in the section below.

Channels available to consumers and end-users to raise concerns (S4-3)

TUI has various channels in place to enable dialogue with its customers, including the TUI App providing 24/7 support, hotlines, channels on social media platforms, travel agencies and local tour reps in many destinations. TUI therefore is directly available at any time, regardless of whether customers want to change their booking, book an excursion or have personal concerns, e.g. a visit to a doctor at the holiday destination. With its Holiday Experiences sector, TUI maintains a local presence in over 100 destinations worldwide with almost 40,000 employees.

In addition, customers and prospective customers can use the external TUI SpeakUp hotline to raise concerns regarding actual or potential infringements of applicable laws or internal policies. In particular after the booking or during the trip, we are in regular dialogue with customers so as to ensure their continual involvement. After the trip or use of a travel component, we actively ask our customers to provide a review. TUI analyses the feedback from its customers, i.e. feedback from holiday trips and experiences and feedback received via other contact channels such as e-mails, phone calls or social media posts. The most relevant data include the Net Promoter Score, accommodation ratings and comments regarding aspects of relevance to health and safety. The system recognises and screens out key terms such as "theft" or "sexual assault" in order to facilitate a better understanding of the risks associated with our services and manage these risks in a targeted manner.

As TUI is available as universal point of contact for all matters related to a package tour booked by a customer, direct communication channels between customers and sub-contractors or business partners are not required.

For information about the process for following up on and monitoring matters raised via our whistleblower channels, please refer to the section [Management approach 2: Whistleblower protection](#) in the chapter Business conduct (G1).

The information about the TUI SpeakUp Line for employees provided in the chapter Business conduct (G1) equally applies to customers. TUI tour reps use special, tailored processes such as "Solve on the spot" in Germany to provide solutions if customers unexpectedly are not happy with their holiday. By immediately reporting their complaint to the TUI Service, customers can meet their obligation to submit a notice of defect and offer TUI the opportunity to quickly remedy the situation. If the situation cannot be remedied, TUI usually offers its customers adequate compensation.

As a general rule, all information channels are openly communicated: from the contact data of a travel agency through to the contact options on our websites, via our TUI App or via our social media presence. These contact options are also explicitly communicated to customers in the booking documents. The active use of these channels reflects the trust our customers place in our services. The associated delivery, e.g. the performance of travel agents in relation to processing the contacts, is continually recorded and monitored.

Actions on material impacts on consumers and end-users (S4-4)

Actions in relation to health and safety

CONTENTS

TUI Group's ambition is to use its business model to enhance the safety of travel. The goal is to provide its customers with safe holiday experiences and also meet its own high quality standards. TUI Group has implemented a range of actions to maintain and reinforce positive impacts and to mitigate risks.

¹ The CSAT score is captured by means of customer satisfaction questionnaires. It is based on the question: "If you think of your holiday overall, how do you rate the booking experience / your accommodation/the TUI App etc.?"

All employees working in safety-relevant environments take part in regular training programmes on health and safety issues. The goal is to enable them to ensure our customers' health and safety. The frequency of the training programmes varies, depending on the topic and the underlying legal regulations.

As TUI maintains various touchpoints with its customers in delivering the services it offers, the actions launched by the Company vary to match business activities. The key health and safety-related actions aiming to ensure customers' well-being and ensure consistent processes include:

- Raising employees' awareness of health and safety: All employees undergo training on health and safety, depending on their role within the organisation. Our employees learn how to handle potential incidents. This ensures a high safety management standard and therefore the wellbeing of TUI customers on their holiday trips and experiences.
- A universal approach to health and safety risk management: TUI pursues a risk-based, data-driven and data science-based approach for managing health and safety risks in our entire accommodation, activity and transport portfolio. The approach takes account of the degree of control and influence we exercise over individual providers, based on our contractual relationship and the definition of appropriate and feasible requirements. This ranges from full ownership and control to contractual agreements via third parties. All suppliers are subjected to a risk matrix to establish where the biggest risks are. Targeted assessments are carried out, if and as required, and depending on the overall risk score, additional follow-up actions, training programmes and various other measures varying in scope will be implemented.
- Food safety: TUI carries out various actions to avoid health risks, including the introduction and maintenance of a management system for food safety, such as an HACCP (Hazard Analysis Critical Control Point) plan, appropriate to the range of food and beverages offered. These actions include processes to handle food allergens. All contract businesses working for TUI must provide evidence that they alert customers to potential food allergens. TUI also uses processes to evaluate and track risks, so that concerns about health and safety can be raised and remedied within a given timeframe. If a problem is not resolved, it can be passed on to the TUI Management, and preliminary actions to control the risk can be initiated. These actions aim to effectively contain, minimise or eliminate risks related to food safety in order to enhance customers' wellbeing during their holidays.
- Fire protection: TUI operates strict measures, including the installation and regular maintenance of fire protection systems, the provision of unimpeded emergency exit routes through protected stairways and the use of self-closing fire protection doors in guest rooms and risk zones. TUI also attaches importance to clearly marked emergency exits and fire instructions as well as a documented emergency plan including fire protection measures, training programmes for employees and evacuation drills. TUI also has processes in place to support people with limited mobility in the event of a fire. All actions aim to minimise the fire risk, prevent the spread of fires and ensure the safe evacuation of all persons in the event of a fire. Similar risk-specific policies and processes are in place for other risk areas, e.g. water management and pool safety.
- Hotel infrastructure, TUI Airlines and Cruises: TUI has a number of Group policies in place that set out actions to prevent accidents, e.g. in TUI's hotels. These policies comprise regulations, e.g. relating to the height of balcony rails, fire protection and pool areas. In Cruises and Airline, TUI complies with the applicable statutory regulations. TUI makes every effort to address safety matters at an early stage when planning newbuilds or major renovation projects. The goal of the actions is to ensure a safe holiday experience for our customers.
- TUI Musement: TUI Musement offers most transfers and activities in the destinations, partly operated by TUI Musement itself, but for the most part provided by third parties. For TUI's own vehicles, TUI has established measures to reduce health and safety risks, including the selection of and training of drivers, standards governing drug and alcohol consumption, and the safety of customers on board. TUI has also established an emergency plan and processes for vehicle maintenance in order to protect the health and safety of drivers and passengers. Other providers of TUI Musement activities and transports, usually operating as sub-contractors, are obliged under the Supplier Code of Conduct to anticipate, identify, assess and control risks, including emergency situations and events. They must implement emergency plans and response procedures, which include reporting emergencies, informing employees, carrying out evacuations, providing emergency training and drills for employees, offering appropriate first-aid materials, fire detectors and extinguishers, appropriate escape options and recovery plans.
- Reporting and managing incidents: The reactions to incidents vary, depending on the scope and severity of the incident. Day-to-day incidents are usually handled by the local team on the spot. All customer-related health and safety incidents must be recorded in the Group's incident reporting system Riskconnect. These incidents are monitored by the Group's Safety and Risk team, which launches measures, if necessary, ranging from a trend analysis all the way to

comprehensive local investigation with the support of experts. If an incident is reported, immediate escalation is required in the destination, and the source markets is immediately contacted and involved. The service in charge is available 24/7 to inform the required departments. Internal escalation in the source market ensures that the relevant internal departments, including the Communication Department, Health & Safety and the Social Teams, are notified. In the event of damage, customers and their relatives are offered comprehensive support and services, including medical aid, provision of interpreters, an escort for appointments with hospitals and doctors, private transfers and arrangements for customers to stay in their hotel rooms until their departure. In addition, arrangements are made for the onward journey and repatriation of the customers' personal belongings, and follow-up contact is established in order to offer further support.

SCOPE

The actions are implemented by the individual business areas, taking account of any particularities including the legal framework. TUI's contract partners are obliged to comply with all applicable national and local laws and regulations and obtain all licences, certificates, approvals and permits required for the accommodation and the services offered.

TIME HORIZON

The Safety Management System and the associated policies and procedures are reviewed at regular intervals with a view to continuous improvement. As we are constantly working to mature our approach to managing health and safety risks, the next steps will be for us to introduce training programmes on topics we have identified as offering the greatest potential for further improvements in the customer experience and customer health and safety.

EFFECTIVENESS

A multi-stage system is in place to continually monitor and assess the effectiveness of the health and safety-related actions outlined above. Key elements of that system are regular visual and function inspections carried out in all relevant business areas. The results of these inspections are systematically documented and evaluated in the Group-wide risk management systems, enabling us to identify trends, recurring weaknesses and potential improvements early on. In addition, all incidents of relevance for health and safety are recorded and analysed in the central reporting system. If any irregularities are noticed, measures ranging from trend analyses to detailed local investigations are promptly launched. The implementation and effectiveness of these measures is regularly reviewed and the measures are modified, if necessary. Effectiveness is also assessed on the basis of indicators such as the number and severity of incidents, the time required to remedy reported defects and the results of customer surveys. The findings are incorporated into a continuous improvement process in order to further develop the health and safety standards and adapt them in the light of new requirements.

This structured process ensures that TUI Group implements actions that are effective in the long term and meet the Group's high quality and safety standards.

OUR ASPIRATION

Our ambition in implementing the actions outlined above is to ensure that TUI Group's business operations do not have any negative impacts on customers and that the positive impacts are maintained and reinforced.

In financial year 2025, there were no material problems or incidents in connection with the human rights of our customers.

The means and resources required to implement the above actions are included in the budgets of the relevant business areas and departments. For larger investments, an investment budget is established as part of the financial planning process.

Actions related to personal security

CONTENTS

TUI Group has implemented various actions to promote safe travel. The goal of its process for handling environmental and country-specific risks is to ensure safe travel for TUI customers and offer them security throughout their journey.

- Determining risks: Risk management serves to identify, assess and document predictable risks.
- Determining actions to reinforce security: Based on the risk assessment, actions are implemented in accordance with needs.

- Developing emergency plans: Emergency plans offering protection from safety hazards are developed and have to be complied with in all sites.
- Information and consent: In the event of risks existing prior to departure, customers have to be informed about the risks and must grant their consent.
- Raising awareness: Training programmes on current risks and safety instructions are carried out for employees and contract partners.
- Offering appropriate support: TUI provides support and insurances to support employees and customers in the event of an incident. TUI Group Security works for the source markets, TUI Hotels & Resorts and TUI Musement, setting Group-wide safety standards to ensure that TUI minimises all potential safety risks in all destinations and has initiated appropriate response strategies and control measures. The measures are controlled by Group Security at Group level.

There is no systematic tracking and assessing of these actions, as their preventive nature, external factors such as dynamic environmental and country risks, and subjective perceptions of security prevent any clear measurement of their effectiveness.

SCOPE

Group Security, Health, Safety & Crisis monitors the actions for TUI Group overall. Operational implementation and the scope of the actions taken are determined on a case-by-case basis for the individual regions. The scope of the key measures excludes accommodation providers that have to be used in an emergency situation, e.g. in the event of flight diversions or delays, as providers outside of the existing portfolio may have to be called upon in that type of scenario.

TIME HORIZON

The above actions are implemented continually and are not subject to a specific time horizon.

Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities (S4-5)

TUI does not have any fixed targets related to our customers' health and safety, as our fundamental goal is to protect our customers' health and safety as far as reasonably possible. The risks to which our customers and the Group are exposed are monitored, with priority given to the areas of highest risk. We constantly strive to offer our customers experiences that are as safe as possible, without defining any detailed targets. If any incidents occur, reports are submitted in accordance with the process outlined above and appropriate measures are taken.

NPS as an indicator of our customers' willingness to recommend is above all an indicator for the perceived quality of our products and services. It is used as a qualitative indicator to assess the effectiveness of our safety measures. Compliance with our safety concepts and measures is a necessary but insufficient condition for achieving a high NPS score. NPS is therefore not regarded as a target within the meaning of ESRS S4.

Governance

Business conduct (G1)

Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (ESRS 2, SBM-3)

The table below provides an overview of the results of our double materiality assessment of material impacts, risks and opportunities for issues relating to consumers and end-users.

G1 Business conduct

Subtopic	Impact / Risk / Opportunity	Time horizon	Position	Description
Corporate culture	Opportunity	Short-, medium- and long-term	Own operations	A strong Integrity & Compliance culture can help to promote people's commitment and motivation, recruit and retain highly qualified talents and reduce risks and costs arising from breaches of rules.
Political influence and lobbying activities	Positive impact	Medium- and long-term	Own operations	TUI's transparent and registered political engagement and lobbying in the tourism sector includes the promotion of specific political measures, rules or interests shaping tourism in the long run.
Whistleblower protection	Risk	Short-, medium- and long-term	Own operations	Infringements of the German Whistleblower Protection Act and the EU Directive on the Protection of Persons who Report Breaches of Union Law can result in fines, publication of confidential information and reputational damage. Appropriate protection can strengthen stakeholders' trust.
Anti-corruption and anti-bribery	Positive impact	Short-, medium- and long-term	Own operations	Preventive measures and anti-corruption and anti-bribery rules contribute to an ethical and transparent business model.

TUI's ambition is to be a role model for responsible governance in the tourism sector. Integrity, legally compliant behaviour and transparency towards stakeholders such as guests, employees, business partners and investors are key elements of our corporate culture, contributing significantly to our reputation and our goal of securing the long-term success of our business.

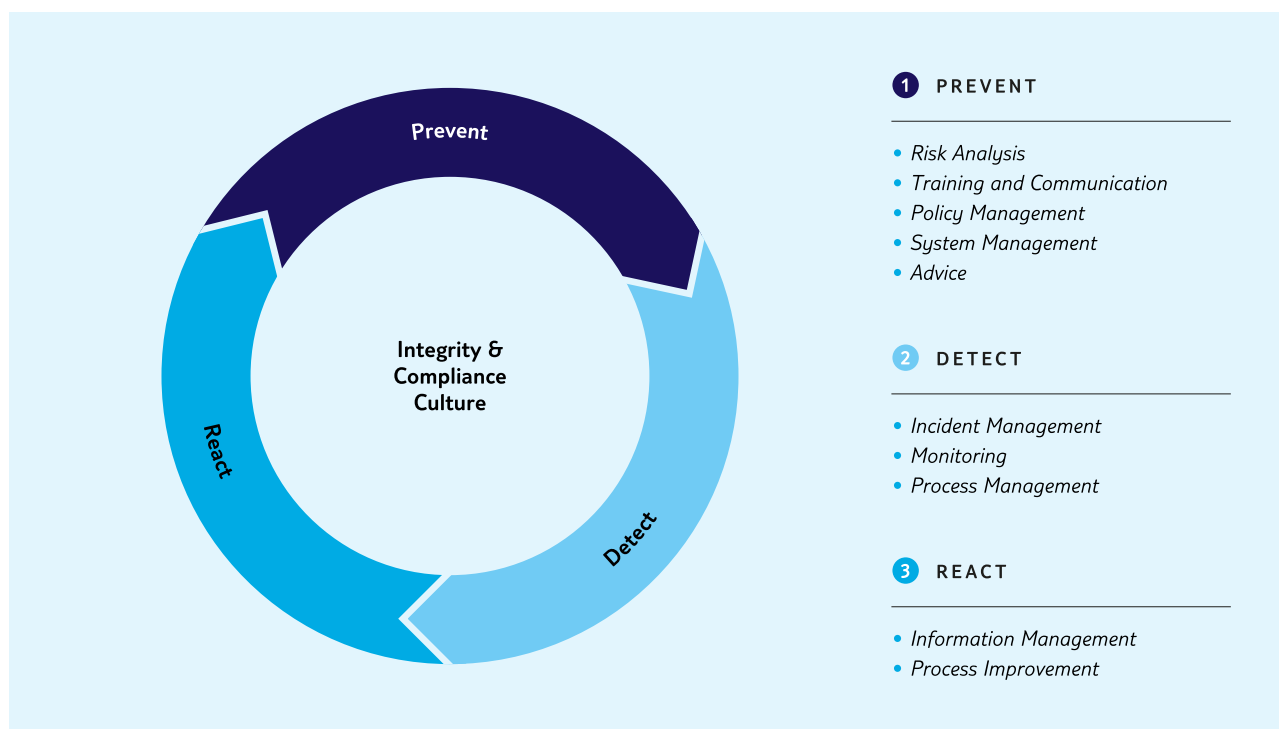
For these reasons, TUI's Compliance Management System aims to promote integrity and prevent potential misconduct, to make liability risks manageable for TUI and its employees, avoid penalties and fines, and thus protect the Company's reputation. Integrity & Compliance is a fundamental component in TUI's governance structure and is supported by corresponding processes and control mechanisms across the Group.

Our actions to promote legally compliant and ethically responsible business practices include, in particular:

- Advising employees on core compliance issues such as sanctions, corruption, bribery, and fair competition
- Performing risk analysis on these core compliance topics
- Raising awareness of Integrity & Compliance through communication campaigns
- Providing training programmes
- Implementing actions to ensure acting in accordance with our commitment to integrity as set out in our Integrity Passport – the TUI Code of Conduct
- Ensuring the necessary exchange of information between local management and the Integrity & Compliance team
- Reporting regularly to the Group Executive Committee and the Audit Committee of the Supervisory Board

Managing business conduct (G1-1)

Compliance Management System



TUI Group's Compliance Management System is based on a risk management approach. It is built around three pillars: prevent, detect and react, which in turn, comprise a variety of measures and processes. Our Compliance Management System defines pilot and standard operation and the documentation of roles, responsibilities and processes in these areas. The focus of our work is on preventive risk management in order to identify potential infringements of laws, rules or internal policies early on and to systematically rule them out. The core areas of the Compliance Management System are anti-corruption, fair competition and trade sanctions.

The system applies across TUI AG and all companies majority-owned, directly or indirectly, by TUI AG, whether domestic or foreign, and any other shareholdings where management control directly or indirectly lies with TUI AG ('Managed Group Companies'). Implementation of the Compliance Management System is recommended for companies where the management control does not lie with TUI AG ('Non-Managed Group Companies').

Integrity & Compliance Structure

The Chief Compliance Officer, who reports directly to the Chief People Officer and Labour Director on the Executive Board, is responsible for drawing up, maintaining and developing the Compliance Management System. He is supported by the central Integrity & Compliance department, forming part of Legal, and its Group Director. The Group Director is responsible for designing and improving the Compliance Management System with the support of a team. Dedicated operational Compliance Officers exist for all regions and segments of TUI Group. They are in close contact with local management, who remain responsible for observing all Compliance rules in the respective Group company.

Managing the impacts, risks and opportunities

TUI Group addresses the following topics in its management approach:

1. Strategies in relation to business conduct policies and corporate culture
2. Whistleblower protection
3. Political influence and lobbying activities
4. Prevention and detection of corruption and bribery

Management approach 1: Strategies in relation to business conduct policies and corporate culture (IRO-1)

Our Integrity & Compliance culture is a fundamental component in our ambition to be a role model for responsible governance in the tourism sector. It influences the behaviour of our employees and their attitude toward complying with applicable rules. Our culture is based on our corporate values and the fundamental attitude and behavior of our managers - from management to the Executive Board and Supervisory Board of TUI AG ('tone from the top'). It is expressed, in particular, in our corporate value 'Trusted', which appeals to our employees' personal responsibility and their honesty and sincerity in handling guests, fellow employees and other stakeholders. TUI's understanding of Compliance extends beyond respecting laws and regulations, as we shift our Company's culture away from a purely rule-based approach towards a living culture of integrity. It is the responsibility of the TUI Group's management bodies to stipulate and monitor legally compliant conduct in exercising our business activities and in handling employees.

TUI is a signatory to the UN World Tourism Organisation (UNWTO) Global Code of Ethics and prohibits any form of bribery or corruption including kickbacks, creating a framework for ethical business conduct. These values are anchored in our Integrity Passport and are additionally passed on to our suppliers through the contractual inclusion of the Supplier Code of Conduct, which requires them to comply with international anti-corruption conventions and national anti-corruption regulations, such as the provisions of the UN Global Compact, the UK Bribery Act 2010, and the US Foreign Corrupt Practices Act 1977.

Through its Integrity & Compliance culture, TUI promotes ethical and sustainable behaviour beyond its own business activities, extending it into the supply chain and the entire tourism sector.

Management approach 2: Whistleblower protection

The whistleblower system is a key element of responsible governance at TUI. That is why TUI offers employees across the Group the opportunity to report suspected infringements of laws, environmental or human rights-related due diligence obligations or the principles anchored in the Integrity Passport anonymously and without reprisals. In order to protect whistleblowers from negative consequences, TUI has established internal rules, which are stipulated in the Integrity Passport and the Group Works Agreement on the Whistleblower System. In accordance with the requirements of the German Supply Chain Due Diligence Act and the EU Whistleblowing Directive, the system is also open to external parties outside TUI Group. It is provided by an independent third party and available worldwide. Encryption software ensures that any reports submitted remain anonymous. Access to the electronic whistleblowing system is available to all employees on the intranet. Information for third parties is provided on TUI's website (<https://www.tuigroup.com/en/whistleblowing>). In addition, a mailbox is available for e-mail submissions (compliance@tui.com), providing a channel for direct contact with the Integrity & Compliance team.

Incoming reports are consistently followed up in the interests of all stakeholders and the Company. TUI's top priority is to ensure confidentiality and handle information discreetly to protect whistleblowers. All reports from the whistleblower system and the email inbox are picked up by the Integrity & Compliance Team and, depending on the facts of the case, investigated and processed in consultation with various departments. The individuals entrusted with conducting proceedings, including those relating to incidents in connection with the management, are generally required to be impartial, independent, and not bound by instructions, as well as to maintain confidentiality, ensuring that the investigators are separate from the management chain. Further details on the handling of whistleblowing are set out in the rules of procedure, which are available on the local intranet and on TUI's website (<https://www.tuigroup.com/en/whistleblowing>). Personal data submitted to us via the electronic whistleblowing system are treated in accordance with our data retention requirements. Mandatory training and ongoing communication measures serve to ensure that employees are aware of the whistleblowing system.

Information from the whistleblowing system is included in the quarterly report to the Group Executive Committee and the annual report to the Audit Committee.

Management approach 3: Political influence and lobbying activities (G1-5)

In the framework of its lobbying activities, TUI advocates aspects related to sustainable tourism, aiming to create a positive impact on the global tourism market. In implementing these activities, TUI pursues ethical practices and ensures transparency in order to uphold public confidence and prevent corruption. Moreover, TUI does not give any – financial or non-financial – contributions to policymakers. As there are no specific directives dealing exclusively with lobbying and political engagement, it is crucial to ensure that all employees respect the values anchored in the Integrity Passport and are familiar with the internal Group Policies on Gifts and Hospitality and on Fair Competition in order to ensure transparency and integrity in TUI's business operations.

Overall, TUI Group's strategic targets and ambitions relating to political engagement and lobbying activities focus on maintaining integrity, transparency and ethical business practices as well as protecting TUI Group's reputation and shareholder confidence.

Implementation of these principles and TUI Group's strategic direction are primarily driven by the representatives of its administrative, management and supervisory bodies. None of the members of TUI's administrative, management and supervisory bodies held a position in public administration or with regulators in the two years preceding their appointment.

TUI is listed in the lobbying registers for Germany and the EU. This registration enhances transparency and enables TUI to contribute actively towards designing sustainable, responsible tourism policies.

Information on the lobbying registers is also publicly available on our website <https://www.tuigroup.com/en/policy>

Lobby register

Register	Name	Register number
EU-Transparency Register	TUI AG	654909925315-71
Lobby Register of the German Bundestag	TUI AG	R001264

TUI Group's political and lobbying activities are aligned to specific legislative processes and regulatory requirements in the source markets and destinations. Although there is no overall, measurable target for these activities, they create many different opportunities to reinforce the Company's positive impact in a targeted manner. Balanced political engagement can support the development and implementation of national and regional policies and regulations in the EU. In this way, TUI helps to create a beneficial business environment and actively drive the sustainable development of the tourism sector further ahead.

This strategic alignment is also reflected in a number of lobbying activities pursued by TUI in contributing actively towards shaping sustainable tourism policies:

ALTERNATIVE FUELS

TUI calls for an accelerated use of alternative fuels (such as bio-LNG in the cruising sector) by setting effective incentives for airlines and cruise lines.

BLENDING QUOTAS

TUI supports blending quotas for sustainable fuels (SAF), but calls for support measures for producers and political pressure to promote blending quotas outside the EU.

ACCELERATING SHORE POWER SUPPLY SYSTEMS

TUI calls for faster global expansion of infrastructure to supply large cruise liners with shore power in port and for the formulation of strategies for green electricity.

IMPLEMENTING UNIFORM PTL BLENDING QUOTAS WITHIN THE EU (GERMANY)

TUI calls for the abolition of the strict blending quota for Power-to-Liquid (PtL) fuels applicable in Germany from 2026, which goes beyond the quotas applicable within the EU.

REFORMING THE SINGLE EUROPEAN SKY

TUI calls for Single European Sky (SES) reforms to be pushed ahead by the EU Commission.

TRANSPARENCY AND COMPREHENSIVE CUSTOMER INFORMATION

TUI calls for clear and transparent rules and conditions for package tours and an obligation for online platforms to proactively inform their customers in clear language about the scope of protection when they make a booking or purchase individual services.

Management approach 4: Prevention and detection of corruption and bribery (G1-3)

TUI Group pursues a comprehensive, uniform zero-tolerance approach to corruption and bribery, which is applied consistently across TUI Group's regions and segments. TUI has introduced processes and actions designed at helping to

prevent and detect corruption and bribery. Appropriate Group Policies have been implemented that focus on the prevention of corruption and bribery and promote compliant behavior by providing guidance on how to deal with the most important legal and integrity issues in day-to-day work practice, hence contributing to fair and legally compliant conduct in business operations. This approach is manifested in the Integrity Passport and the Supplier Code of Conduct. Both documents set out the general principles of integrity and ethical behaviour expected from all employees and suppliers. They expressly prohibit any form of bribery and other forms of corruption, including 'grease payments'. They also explain where suspected infringements can be reported and provide links to the TUI Speak Up Line, enabling people to report incidents anonymously.

TUI SpeakUp Line (<https://secure.ethicspoint.eu/domain/media/en/gui/112626/index.html>)

The Integrity Passport, the Supplier Code of Conduct and all Group Policies are approved by the Executive Board. Group Policies are binding for all employees in Managed Group Companies.

Information for employees is available on the intranet or on the corporate website at (<https://www.tuigroup.com/en/compliance> and <https://www.tuigroup.com/en/responsibility-and-positions/humans-rights>).

In addition, information for external third parties is available on TUI Group's website at (<https://www.tuigroup.com/en/compliance> and <https://www.tuigroup.com/en/responsibility-and-positions/humans-rights>).

The Group Policy on Gifts and Hospitality, too, sets out detailed guidance on when giving and receiving gifts and hospitalities can be considered appropriate. It emphasizes the importance of transparency by stipulating that gifts and hospitalities are to be documented in the Gifts and Hospitality Register and formulating the requirement that prior approval must be obtained for gifts and hospitalities involving public officials.

Moreover, Integrity & Compliance provides a 'compliance clause' for inclusion in agreements and contracts. The clause contains the above-mentioned anti-corruption and anti-bribery obligations and passes them on to our suppliers.

In addition, managers and directors are surveyed annually about conflicts of interests to ensure that potential conflicts are made transparent and can be resolved if necessary.

At regular intervals, a risk analysis is carried out at selected TUI Group companies, covering topics such as corruption and bribery. The results of these analyses are discussed with the responsible management, and risk-mitigating actions are derived and implemented.

Reports of potential incidents of corruption and bribery are investigated in cooperation with other relevant departments. Findings from the investigations are used to enhance the Compliance Management System, adjust the relevant processes and thus prevent systemic misconduct. The results of the investigations are regularly reported to the Group Executive Committee and the Supervisory Board by the Group Director Audit.

The online training programme on the Integrity Passport, which explains integrity and the underlying corporate values, is mandatory for all employees. The topics of anti-corruption and the appropriate handling of gifts and invitations are also addressed in order to raise risk-oriented awareness of the respective challenges. For the recipients refresher training is mandatory two years after completion. Information on completion rates in the training is included in the quarterly report to the Group Executive Committee and the annual report to the Audit Committee.

Apart from training programmes, TUI also uses other communication formats to convey the importance of Compliance. These formats include articles, short videos and information material provided via the Integrity & Compliance website on the Group's internal intranet.

The Compliance Management System is regularly audited by the Group Audit department. The audit findings contribute to the further development and improvement of the Compliance Management System.

All measures, including those relating to the prevention and detection of corruption and bribery, are regularly reported to the Group Executive Committee and the Audit Committee of the Supervisory Board and are discussed at the meetings of the Group Risk Oversight Committee.

The greatest risks are faced by key management personnel and employees working in the destinations (Around 89% of employees are addressed by the Integrity Passport training programme; it is not offered to pilots and cabin crew.)

In the completed financial year, there were no incidents of corruption or bribery leading to a conviction or fine.

Due to a lack of reliable benchmarks and measurable performance indicators, it is currently not possible to define any specific targets. We continually work towards developing meaningful KPIs and integrating them in the reporting. We are committed to consistently complying with legal requirements and internal policies in order to detect risks early on and avoid potential infringements that might harm the Company.