

Modern Slavery Act Statement

1. Introduction

Etraveli Group is a **global technology provider focused on flight solutions and online travel services**. Our mission is to simplify the complexities of travel by connecting millions of travelers with affordable and accessible flight options.

Founded in 2000 as Seat24 Travel, and strengthened through strategic mergers and acquisitions—including our 2017 integration into CVC Capital Partners and the acquisition of e-Travel—Etraveli Group has grown into a global operation. Today, our brands include **Mytrip, Gotogate, Flight Network, and Flygresor.se**, and we maintain **partnerships with leading travel platforms such as Booking.com, Google Flights, Skyscanner, and Amadeus**.

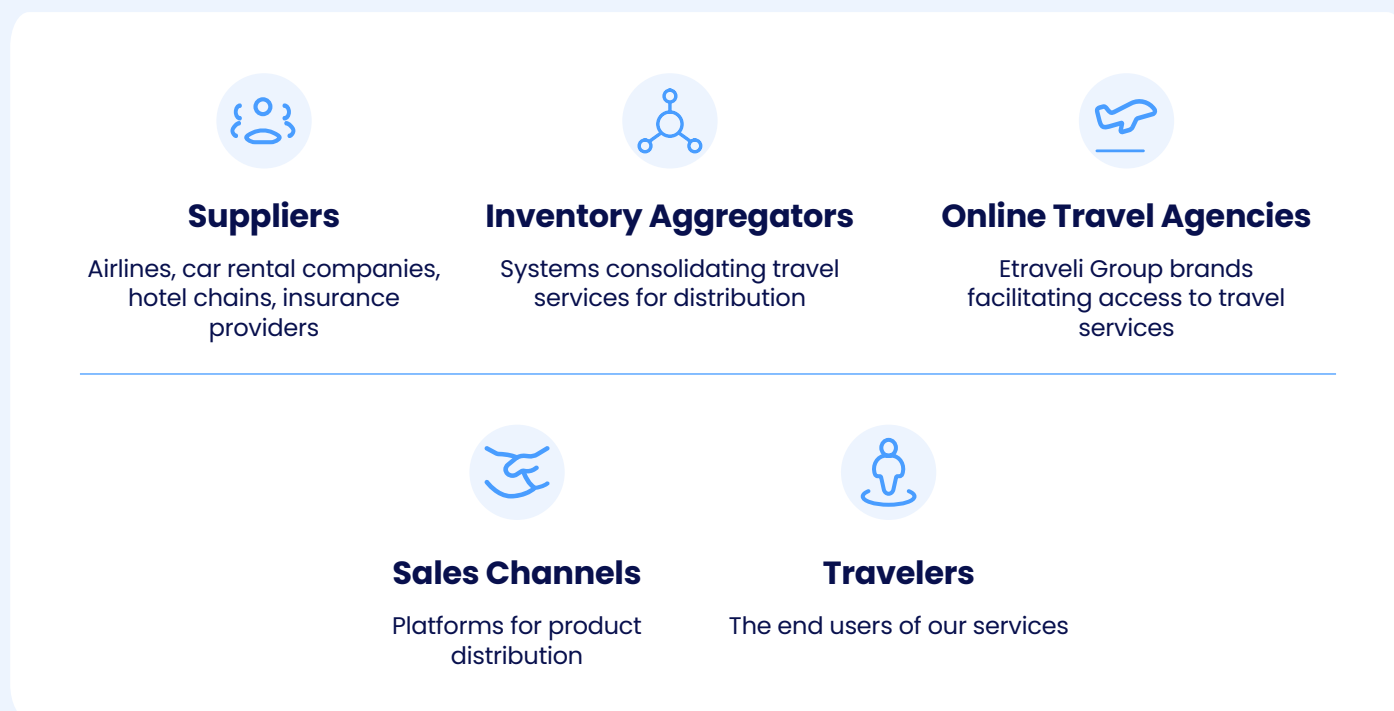
Operating across more than 75 markets, Etraveli Group is supported by a global workforce and supplier network. As we grow, we remain committed to ethical business practices and to protecting human rights across our value chain.

This statement is made by the Etraveli Group pursuant to **section 54 of the UK Modern Slavery Act 2015** for the financial year ending December 31 2024 and sets out the steps taken by Etraveli to ensure that slavery and human trafficking are not present in our business or direct supply chain.

2. Organisation structure and supply chain

Headquartered in Stockholm, Sweden, Etraveli Group has over 2.700 employees across ten global offices, including **locations in Canada, Greece, India, Poland, Sweden, United Kingdom and Uruguay**. In addition, we collaborate with more than 1 800 **outsourced customer service professionals** based in **China, Colombia, Egypt, Georgia, India, Mauritius, Philippines and Vietnam**.

Employees are recruited through internal HR processes. For outsourced customer service operations, we engage with verified global business process outsourcing company partners. **Our value chain includes:**



Supplier sourcing is decentralized and guided by our **internal Supplier and Partner Selection Policy**. In addition, all suppliers must adhere to our Supplier Code of Conduct. Before entering into agreements, we conduct due diligence to assess alignment with our standards and expectations.

We recognize our role in shaping responsible practices across this value chain. Our management team sets the strategic direction and embeds sustainability across all operations. The Senior Manager ESG & Sustainability and Compliance Director leads the integration of ESG risks and regulatory requirements into strategy, policies, and performance monitoring.

3. Policies in relation to slavery and human trafficking

At Etraveli Group, we are committed to equal treatment and opportunity, safe and inclusive workplaces, and promoting human rights wherever we operate. We adhere to:

- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- EU framework for equal treatment in employment
- United Nations Convention against Corruption

In addition, the following internal Group policies support our human rights and decent working conditions efforts:

- **Anti-corruption, Gifts and Entertainment Policy:** Defines acceptable conduct regarding gifts, hospitality, and interactions with third parties, and establishes a zero-tolerance approach to bribery and corruption in line with international laws.
- **Code of Conduct:** Sets out the ethical principles and expectations that guide behavior across the organization, including commitments to integrity, fair treatment, human rights, anti-corruption, and workplace respect.
- **Personal Data Privacy Policy:** Outlines how personal data is handled across the Group in line with GDPR. It includes employee guidelines, departmental responsibilities, and technical and organizational measures to ensure privacy and compliance.
- **Data Breach Policy:** Sets out procedures for identifying, reporting, and managing personal data breaches in line with GDPR. It defines roles, reporting timelines, and communication protocols to ensure accountability and minimize risks to individuals.

- **Global Sanctions Policy:** Ensures compliance with international trade sanctions and embargoes, helping to avoid dealings with restricted parties or jurisdictions.
- **Inclusion and Diversity Policy:** Promotes equal treatment, non-discrimination, and an inclusive culture. Encourages representation and fair opportunities for all employees regardless of background or identity.
- **Internal Fraud Policy:** Aims to prevent, detect, and respond to fraudulent behavior, safeguarding company resources and ensuring ethical operations.
- **Supplier and Partner Selection Policy:** Guides decentralized sourcing decisions across the business, requiring suppliers and partners to meet defined legal and ethical standards.
- **Sustainability Policy:** Outlines Etraveli Group's commitment to responsible business practices, including environmental protection, social impact, and governance across operations and the value chain.
- **Whistleblowing Policy:** Provides a framework for reporting suspected misconduct confidentially and/or anonymously through multiple channels. The policy ensures protection from retaliation and outlines how concerns are addressed and investigated.
- **Code of Conduct for Suppliers:** Outlines essential standards on human rights, labor practices, health, and environmental responsibility. This code is provided to suppliers during the evaluation process and shared prior to contract signing.

These policies are reviewed annually to ensure they remain effective and aligned with evolving legal requirements and best practices. Compliance is monitored through internal audits, risk assessments, and feedback mechanisms. Enforcement involves promoting accountability, providing training, and addressing any issues as they arise to support compliance.

4. Due diligence processes

Our due diligence framework includes the following key activities to identify, prevent, and mitigate risks related to human rights and decent working conditions:

- **Supplier screening** based on country and sector risk;
- **Assessment of recruitment and training practices** confirming that our outsourced roles include comprehensive onboarding and several weeks of paid training. All new employees also receive training on our Code of Conduct as part of their onboarding;
- **Annual materiality assessments** by internal working groups to focus efforts where risks and stakeholder expectations intersect;
- **Grievance mechanisms** across Etraveli Group and suppliers, ensuring accessibility and confidentiality; and
- **Remediation protocols** to respond to any breaches or risks, including internal investigations, engagement with affected parties, and corrective action plans. These may involve contract review or termination in cases of severe or repeated non-compliance.

5. Risk assessment and management

We identify and prioritize actual and potential risks through internal assessments and tools such as the CSR Risk Check. This tool helps us screen for sector- and country-specific risks related to human rights, labor conditions, and environmental issues. It is desk-based and draws on publicly available data from international sources, such as the ILO and UN. In addition, we complement this with internal stakeholder input, supplier questionnaires, and findings from our annual materiality assessment to ensure a more complete risk picture across our operations and supply chain.

Risk assessments are updated annually, with responsibility shared between the ESG & Sustainability team and the Legal and Compliance function, supported by relevant business units. In 2024, the following risks have been identified:

- **High-pressure work environments in customer service:** The travel industry is exposed to risks related to high-pressure customer service roles, which can affect employee retention and well-being, as well as company reputation, particularly when training or resource capacity is insufficient. At Etraveli Group, outsourced customer service roles are skilled positions filled through rigorous recruitment in competitive labour markets. These roles involve several weeks of paid, in-depth training, which helps mitigate these risks and supports performance and retention.
- **Human and labour rights violations:** There is a risk of human and labour rights violations among suppliers if our Supplier Selection Policy is not properly followed or if remediation is not provided in response to identified issues.
- **Decentralized supplier management:** Etraveli Group currently operates with a decentralized approach, where individual departments manage their own vendors. This limits visibility across the supply chain and increases the risk of inconsistent application of ESG requirements. Policy updates and process improvements are underway to enhance coordination and strengthen oversight.

- **Compliance and reputational risks:** As regulations around human rights due diligence and responsible supply chain management continue to evolve, failure to comply could lead to legal penalties, financial loss, and reputational damage. Etraveli Group monitors these developments closely to ensure ongoing alignment with ESG regulations.

In 2024, Etraveli Group has taken several steps to strengthen our approach to human rights and responsible business conduct:

- **Updated the Supplier Selection Policy** to formally include sustainability and compliance requirements.
- **Engaged directly with our two global outsourced customer service providers** to assess adherence to labor standards and the availability of support mechanisms for staff.
- **Strengthened communication and promotion of our existing grievance mechanisms** to increase awareness and support their effective use.
- **Appointed a dedicated Compliance Director**, responsible for overseeing anti-fraud, anti-bribery, and other key compliance areas.
- **Appointed a Senior Manager ESG & Sustainability**, responsible for driving our sustainability agenda, ensuring regulatory alignment, and embedding ESG considerations across the business.
- **Enhanced awareness and understanding of our Code of Conduct**, supported by updated documentation and employee training initiatives.

6. Key performance indicators to measure

At Etraveli Group, we maintain a secure and independent whistleblowing system, available to all employees, business partners and suppliers. The platform is provided by a trusted third party to ensure confidentiality of all reports, as well as accessibility across our global operations. Reports can be submitted anonymously or with full identification, and we uphold a strict non-retaliation policy to protect those who raise concerns in good faith.

All submitted reports are reviewed promptly by a dedicated investigation team. This team follows a structured and fair process to assess the information, determine the appropriate course of action, and ensure that each case is handled with integrity and in line with applicable laws and company policies. When necessary, corrective actions are taken.

We maintain strong corporate governance through clear policies, employee training, and defined accountability. Our independent whistleblowing system reinforces transparency and trust across our operations.

The **Audit Committee** oversees regulatory compliance and ensures that reports meet legal and reporting standards. The **Board of Directors** is responsible for embedding sustainability in our strategic direction. This includes setting sustainability goals aligned with Etraveli Group's mission and values, reviewing performance, monitoring internal controls and risk management, and approving the final sustainability report.

The **Executive Management Team** holds overall responsibility for delivering on the sustainability strategy and ensuring regulatory compliance. The **Senior Manager ESG & Sustainability and Compliance Director** jointly develop and execute the strategy by:

- Integrating ESG practices into day-to-day operations;
- Conducting materiality analyses to identify and prioritize risks and opportunities;
- Staying informed about regulatory developments to maintain compliance; and
- Driving key ESG initiatives across the business.
- We are committed to continuously strengthening our governance framework in response to evolving expectations, stakeholder input, and legal requirements.

- Given these indicators, we are confident that Etraveli Group is currently effective in managing the risk that slavery and human trafficking may be taking place in our business or supply chain, although this is, of course, a consideration that we will keep under continuous review.

6. Training on modern slavery and trafficking

We promote awareness and accountability through mandatory training on our Code of Conduct, covering compliance issues relevant to ethical business practices. This training is provided to all employees during onboarding, with annual refresher sessions to maintain understanding and ensure ongoing compliance.

We will continue to keep the training that we provide to our stakeholders under review to ensure that we are up to speed with best practice.

7. Contact

For any inquiries or concerns, please contact:
compliance@etraveligroup.com.

6. Approval

This statement has been approved by the board of directors of each of the entities named below, effective from October 17, 2025.

Sweden	Etraveli Group AB
Sweden	Svenska Resegruppen AB
Denmark	Den Danske Resegruppen Branch of Svenska Resegruppen AB
Sweden	Gotogate International AB
Finland	OY SRG Finland
Norway	Marco Polo Travel AS
Netherlands	Supersaver Travel B.V
Sweden	Flightmate AB
USA	Gotogate Inc.
Australia	Gotogate Pty Ltd
Sweden	Etraveli Group Holding AB
Sweden	Flugo Holdings AB
Sweden	Flugo Group Holdings AB
Greece	E-travel SA
Israel	Etravel Israel Ltd.
Cyprus	Etravel holding Cyprys Ltd.
Argentina	Gotogate SA
Brazil	Gotogate Agencia de Viagens Ltda
UAE	Gotogate Flights Ltd
Colombia	Gotogate Colombia SAS
Mexico	Gotogate Mexico S.de R.L. de C.V.
India	Etraveli India Private Limited
South Korea	Gotogate Korea LLC
Saudi Arabia	Gotogate KSA Travel and Tourism Company
Canada	Flugo Canada Holding Inc
Canada	Tripstack Inc.
Canada	Flight Network Ltd
Japan	Gotogate Japan K.K.
Poland	ETRAVELI POLAND SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ
Singapore	Gotogate (Singapore) PTE LTD
UK	Flight Network UK Ltd

6. Approval

Switzerland	Gotogate Switzerland AG
Uruguay	Etraveli Uruguay SAS
New Zealand	Gotogate New Zealand Limited
Turkey	Gotogate Turkey Turizm Seyahat
Hong Kong	Gotogate Hong Kong Limited
Taiwan	Gotogate Taiwan Co Ltd
Sweden	EG Fintech Solutions AB