



# Speak Up Policy

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Amadeus Group Corporate Policy

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## 1 Background

Amadeus and its executive management are committed to sustainable company growth in compliance with the highest standards of business ethics, as outlined in the Amadeus Code of Ethics and Business Conduct (CEBC), and we strive to be recognized for our practices and programs in corporate governance. In this context, as established in the CEBC, [our guiding principle is integrity](#) – the personal integrity of each and every member of the Amadeus community and our professional integrity as a business organization.

An essential part of ensuring integrity, transparency and accountability is to put in place a mechanism allowing Amadeus employees and any third parties to report any suspected business practices and/or conduct that would result in a breach of the CEBC, the Corporate Crime Policy, law, regulation, or any Amadeus policies related to business practices or ethical conduct ([Breach](#)).

This mechanism is the [Speak Up Channel](#).

It is vital that anyone who wishes to report an issue through the Speak Up Channel knows that:

- This is a secure and effective way to submit an inquiry or report, anonymously if desired;
- Issues reported will receive appropriate management attention, and investigations will be carried out in an objective, discrete and independent manner;
- The Speak Up Channel guarantees the confidentiality of the information provided as well as the identities of the reporting party and affected persons mentioned in the report;
- Anyone reporting their concerns in good faith will not be subject to retaliation, reprisal or discrimination;
- The presumption of innocence of any persons mentioned in the report will be guaranteed; and
- If a Breach is proven, the Company will take disciplinary measures where appropriate, and consider corrective measures aimed at preventing potential infringements from recurring in the future.

## 2 Scope

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

The Speak Up Policy describes the channel to report certain violations of law, regulation, the CEBC or any Amadeus policies related to business practices or ethical conduct. Amadeus expects all persons, regardless of their length of service, position, or relationship to Amadeus,

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who become aware of or strongly suspect a Breach, to immediately report the issue, whether it involves Amadeus employees, ex-employees, their relatives, contractors, and/or third parties such as suppliers, partners, customers or shareholders.

If any of the provisions of this Policy infringe upon or conflict with applicable local laws or regulations of a country, then such local laws or regulations, as applicable, will prevail with regard to that country. Moreover, please note that this Policy may be linked to local policies depending on the severity and aspects of each case that has been raised, e.g., local grievance and disciplinary policies.

## 3 Protections available to reporting parties and affected persons

Any person who submits a report in good faith through the Speak Up Channel will have the protections set out below. Should Corporate Compliance receive a report relating to a Breach outside the Speak Up Channel (e.g. letter, email, a witness, information reported to the hierarchical supervisor of the reporting party), the information will be subsequently recorded in the Speak Up Channel. To ensure these protections from the outset, the Speak Up Channel needs to be used by the reporting party, and until the information is registered in the Speak Up Channel, it may not be possible to offer the technical and procedural guarantees and protection measures provided for in this Policy.

Persons against whom reports are made, or any other persons named in the report, are, in addition, guaranteed the presumption of innocence.

### 3.1 The Speak Up Channel is a third-party tool

The Speak Up Channel is an external tool, hosted outside of Amadeus servers on the servers of our service provider Business Keeper (or BKMS) in Germany, ensuring maximum confidentiality, security and privacy standards are applied. The information is encrypted and stored in a separate secured BKMS environment.

BKMS cannot access any data contained in the Amadeus Speak Up Channel.

### 3.2 Protection of personal data

In the management of the Speak Up Channel, Amadeus is committed to act in compliance with applicable data protection legislation by protecting the privacy of personal data it collects and processes. The Speak Up Channel's privacy policy provides more details as to how this is achieved.

## 3.3 Confidentiality and anonymity

This Policy and the Speak Up Channel guarantee the confidentiality of the identity of reporting parties and any third party mentioned in a report, as well as of the incident / allegation reported and actions carried out in the management and processing of this information.

All suspected violations must be handled with extreme care and confidentiality during the entire review process, both by a reporting party as well as by those persons who may be notified of the occurrence of a suspected violation or who are involved in an investigation.

The details of investigations and / or written report will not be disclosed or discussed with anyone other than those persons associated with the Company internally or externally, who have a legitimate need to know to perform their investigative or remedial duties and responsibilities.

Amadeus may also disclose personal data as required by law, subpoena, or regulation; when requested by government or law enforcement authorities or as otherwise required or permitted by law. In addition, a reporting party may be requested to make a statement to the relevant law enforcement authority(ies) or otherwise give evidence to the extent required by law or order of a court.

Amadeus has taken appropriate technical measures to ensure the anonymity of reporting parties, in case they may choose to make their report anonymously. The reporting party must create a secured postbox to enable the investigative process, since it will allow the reporting party to interact with the investigative department (Corporate Compliance) in full anonymity.

## 3.4 No retaliation

There shall be no retaliation, threat or discrimination against any person who reports an issue under this Policy in good faith. Retaliation is any action, either taken or not taken, that causes financial, professional, or emotional harm to a reporting party as punishment for submitting a report. Annex 1 provides a more detailed list of acts that could be considered as retaliation.

Taking or threatening to take retaliatory action against anyone reporting their concerns under this Policy is strictly prohibited and will subject the person threatening retaliation to appropriate disciplinary action up to and including dismissal or judicial action.

If a reporting party suspects that they are being subject to retaliation after filing a report, they should immediately report this using the Speak Up Channel.

Amadeus recognizes there will be times when a person makes a report in good faith, which later proves to be unsubstantiated, and no action detrimental to a reporting party will be taken in these cases. However, Amadeus will act against those who intentionally or maliciously give false or misleading information against someone else. Instances reported in bad faith, shall be subjected to disciplinary actions.

## 3.5 Other rights and guarantees available to reporting parties

After a reporting party submits a report, Amadeus will follow up on the report within 3 months and provide feedback to the reporting party about the status of the analysis (e.g., whether it is in process or closed). This could be extended by an additional 3 months where necessary due to the specific circumstances of the case (e.g., the nature and complexity of the subject of the report, which may require a lengthy investigation).

Amadeus is confident that its Speak Up Channel is designed, established and operated in a secure manner, in line with applicable regulations that ensure the necessary protections of reporting parties and any others mentioned in reports, and prevents access by non-authorised staff members.

Further, Amadeus' executive management has designated Corporate Compliance, an impartial department, clear of conflicts of interest, as competent for receiving and following-up on any reports. Corporate Compliance will evaluate the matter, perform an investigation if required, and prepare a report, except if:

- i. The report is against Corporate Compliance, in which case it will be automatically routed to Group Internal Audit. Corporate Compliance will not be able to see these reports;
- ii. Corporate Compliance has any kind of conflict of interest due to the facts of the case, in which case it will be routed to and received by Group Internal Audit.
- iii. The report is related to harassment (moral or sexual) and/or discrimination, in which case it will be received and investigated collaboratively between P&C and Corporate Compliance. If the report is against a member of P&C, it will be automatically routed to Corporate Compliance.
- iv. In some cases, due to the sensitivity of the facts reported or the technical complexity of the investigation, Corporate Compliance may decide to have an investigation carried out by an independent third party (e.g., a law firm or a consultant).

Based on the above, reporting parties are strongly encouraged to report internally via the Amadeus Speak Up Channel first. If there is no feedback and/or no appropriate follow-up by Amadeus in line with the policy, EU and national law may extend whistleblower protection under certain circumstances to a reporting party that reports externally to competent authorities.

## 3.6 Rights and guarantees of persons alleged of wrongdoing

The presumption of innocence and the rights of defense of any persons named or mentioned in a report are guaranteed throughout the investigation process.

Any persons against whom a report is made will be informed of the existence of a report against them at the time the investigations process allows this. However, when there is a significant

risk that such notification may affect the ability to effectively investigate the report or gather the necessary evidence, notification of the affected persons may be delayed for as long as such risk exists.

## 4 Report Management Process

Corporate Compliance will receive, review, investigate and follow up the report, except as mentioned in section 3.5.

After submitting a report, the reporting party will receive a reference number allowing them to set up a secured postbox, to receive feedback, and to provide additional information. If the reporting party has correctly identified themselves (meaning they have indicated in the Speak Up Channel their name and surname) or wants to remain anonymous and has setup a secured postbox, an acknowledgment of receipt will be sent within 7 days.

The following are the different phases in the process of managing a report:

### 4.1 Evaluation of the report

Once a report is received, Corporate Compliance shall decide whether or not to process the report, based on the information provided by the reporting party. The report will be dismissed in the following situations:

- If the facts reported are not related to a potential Breach,
- If the report is manifestly unsubstantiated, or
- If the reporting party does not provide enough information for the verification of the facts and, after more information is requested, nothing additional is provided.

If a report is not subject to the Speak Up Policy, then the Corporate Compliance department will redirect the report as appropriate.

If, after a preliminary analysis of the facts, it is considered that the report includes enough information, a verification of the facts will be carried out. Depending on the nature and extent of the alleged Breach, the allegation may:

- Be investigated by Amadeus;
- Be referred to an external party such as a law firm or an investigative consultant; or
- Be referred to the police or to a regulatory or enforcement agency.

The verification of some reports, due to the facts alleged, should be considered a priority. Specifically, the most relevant facts will be those related to situations that may refer to corruption, or that relate to potential criminal liability, or that are contrary to the law (such as sexual harassment), or that may affect the reputation of the company, or situations that may have a significant economic impact for the company, or that affect executives or a large number of employees.

## 4.2 Investigation of the report

If, after a preliminary review of the facts, Corporate Compliance considers that there is reasonable suspicion of potential misconduct, then the facts will be investigated and verified.

Corporate Compliance will lead the investigations (except as mentioned above in Section 3.5) and will carry out the actions and interviews (e.g. affected parties and witnesses) it deems necessary. All Amadeus employees are obliged to cooperate in the investigation.

For the investigation of reports, this Policy and the Investigations Protocol will be followed to ensure investigations will be carried out in a consistent manner, ensuring that an established procedure has been followed in all cases.

## 4.3 Investigation Outcome

Once the independent and objective investigation of the alleged facts has concluded, Corporate Compliance will convey the information and conclusions based on facts gathered during the investigation in a written Report. Two situations can occur:

- The report is substantiated if it can be demonstrated that at least one of the facts reported constitutes a Breach.
- The report is not substantiated if it cannot be demonstrated that at least one of the facts reported constitutes a Breach.

## 4.4 Retention of personal data

During the report management process, the Company will be compliant with applicable data protection legislation, protecting the information stored.

After the investigation, personal data provided through the Speak Up Channel and gathered during the investigation process will be kept in a confidential repository.

Amadeus may disclose personal data as required by law, subpoena, or regulation; when requested by government or law enforcement authorities; or as otherwise required or permitted by law. In addition, a reporting party may be requested to make a statement to the relevant law enforcement authority(ies) or otherwise give evidence to the extent required by law or order of a court.

# 5 Reporting

Corporate Compliance will periodically inform the Amadeus Audit Committee about:

- Statistical data and nature of complaints received.



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- Complaints received through the Speak Up Channel, status of the analyses of the investigations and relevant investigations closed, if they materially affect Amadeus' reputation or could have a significant financial impact on the company.

Any information shared will be anonymized absent any overriding legal requirements.

Departments or business units identified in the complaints shall participate in the design of any remediation plans and implement and monitor their implementation. Corporate Compliance will share any remediation plans with Group Internal Audit, in case they could provide assistance to the affected areas as part of the scheduled group audit plan.

## 6 Exceptions Procedure

Any exception or limitation to the implementation and validity of this Policy (for example due to legal constraints) is to be approved by the Chief Risk & Compliance Officer of the Amadeus Group.

All Amadeus companies are to ensure that this Policy is in force for all those under their respective scopes, whatever their seniority, employment duration, etc.

Management should ensure the Policy is permanently available and accessible to all persons (whether in its original English version, or duly adapted to local language and regulations, according to the Exceptions Procedure previously described).

## 7 Ownership & Further Guidance

The owner of this Policy is Corporate Compliance. Corporate Compliance will oversee and administer the Policy, develop, and maintain procedures and guidelines to support the Policy. and work with key stakeholders to ensure that all receive adequate communication and training on the Policy and its implications.

Any questions or requests for clarification on any issue arising under this Policy can be directed to Corporate Compliance.

## Annex 1

### Threats and attempts of retaliation according to Article 19 Directive EU 2019/1937

- a. Suspension, lay-off, dismissal or equivalent measures;
- b. Demotion or withholding of promotion;
- c. Transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- d. Withholding of training;
- e. A negative performance assessment or employment reference;
- f. Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
- g. Coercion, intimidation, harassment or ostracism;
- h. Discrimination, disadvantageous or unfair treatment;
- i. Failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that they would be offered permanent employment;
- j. Failure to renew, or early termination of, a temporary employment contract;
- k. Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- l. Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- m. Early termination or cancellation of a contract for goods or services;
- n. Cancellation of a licence or permit;
- o. Psychiatric or medical referrals.