

Corporate Crime Prevention Policy  
(General Principles)  
Amadeus IT Group, S.A.

December 2018

## Introduction

In light of the regulatory changes on criminal matters in Spain, and in line with the ethics and compliance culture of the AMADEUS Group, AMADEUS IT Group, S.A. ("AMADEUS") has launched a specific compliance program for the prevention of the commission of crimes.

The Board of Directors of AMADEUS has the responsibility, amongst other issues, to formulate the strategy and approve the Corporate Crime Prevention Policy, as well as to organize the internal control systems for that purpose. In the exercise of these responsibilities, and in accordance with its functions towards the prevention of irregularities, the Board approves to implement this Policy.

## Policy

AMADEUS undertakes to:

- 1) be aware of the overall regulatory framework governing its operations;
- 2) implement the necessary steps and procedures in order for the Company to be in compliance with current applicable legislation;
- 3) fully respect the obligations and commitments assumed in its contractual relationships with third parties
- 4) respect the general principles of risk management for the prevention of crimes included in the Corporate Crime Prevention Manual and
- 5) comply, and take required or advisable steps in order for executives and staff in the Company to comply with the Code of Ethics and Business Conduct approved by the CEO and the Executive Management Team.

AMADEUS shall establish control mechanisms required or advisable to prevent that any employee of AMADEUS or any group company negligently or willingly collaborates with third parties in the violation of any law, or participate in actions that compromise its respect for the principle of legality.

The members of the Board of Directors of AMADEUS express their commitment to "zero tolerance" with crimes and, in this context, reaffirm their firm opposition to the commission of any type of illegal or criminal act and their total commitment to put all reasonable means at the disposal of the Company (a) for the detection, prevention and punishment of fraudulent acts or crimes that may be committed by i) their legal representatives, ii) those authorized to make decisions on behalf of the company or having powers of organization and control, or iii) of its employees, executives or of any person subject to its authority, as well as (b) in order to maintain at all times a business culture of honesty and ethics.

This commitment is materialized through the Corporate Crime Prevention Program. The Compliance Officer will periodically review this Policy and will propose to the Board of Directors, through the Audit Committee, any required modifications and updates that may contribute to its development and continuous improvement, taking into account, as appropriate, the suggestions and proposals made by the Board members or by Members of the Executive Management Team of AMADEUS.

**This Policy has been approved by the Board of Directors of Amadeus on the 13th of December, 2018.**