



Amadeus IT Group, S.A. and
subsidiaries

Non-Financial Information
Statement and
sustainability information
2024

(This document is part of the consolidated Directors' report
approved by the Board of Directors at the meeting held on
February 27, 2025)

Amadeus IT Group, S.A. and subsidiaries

Non-Financial Information Statement and sustainability information 2024

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1. GENERAL INFORMATION

ESRS 2 - GENERAL DISCLOSURES

Through this document —Non-Financial Information Statement and sustainability information 2024 — Amadeus complies with the Law 11/2018, of December 28, 2018 on non-financial information statements, and the Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088. It has been produced in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council as regards corporate sustainability reporting (CSRD), and the European Sustainability Reporting Standards (ESRS). This report is completed with certain elements of the law 11/2018¹, included in *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*. The same format, methodology and reporting frameworks—mainly the Global Reporting Initiative (GRI)—applied in previous years to produce the Non-Financial Information Statement, have been used to produce this Annex.

Basis for preparation

ESRS 2 BP-1- General basis for preparation

The Non-Financial Information Statement and sustainability information of Amadeus IT Group, S.A. and subsidiaries (hereafter, Amadeus, the “Amadeus Group”, the “company” or “the Group”)² for the year ended December 31, 2024, has been prepared in compliance with the Law 11/2018, of December 28, 2018 on non-financial information statements, and in accordance with the CSRD and the ESRS.

This Statement presents the main aspects of Amadeus Group business model and its corporate risk management, as well as its governance and performance related to material sustainability topics, including performance indicators (sustainability metrics). The section *Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation)* of this document includes Amadeus’ EU Taxonomy disclosures as per the requirements of article 8 of EU Regulation 2020/852. The Non-Financial Information Statement and sustainability information is an integral part of the consolidated Directors’ Report for the year ended December 31, 2024.

This report uses the same consolidation scope as the Amadeus consolidated annual accounts. Consequently, the reporting scope for each material aspect includes Amadeus IT Group, S.A. and its controlled entities, listed in the Annex of the 2024 consolidated annual accounts of Amadeus IT Group, S.A, unless otherwise indicated.

Principal elements of Amadeus’ upstream and downstream value chain have been considered in the double materiality assessment process, as described in section *ESRS 2 IRO-1- Description of the process to identify and assess material impacts, risks and opportunities*. The basis for preparation of

¹ The CSRD should have been transposed under Spain regulation before July 6, 2024. Nevertheless, as of December 31, 2024, the CSRD has not been transposed into Spanish legislation.

In this context, on November 27th the Accounting and Auditing Institute (ICAC) and the National Securities Market Commission (CNMV) in Spain published a statement on sustainability reports. In their opinion, an undertaking that prepares an annual sustainability report for the year 2024 in accordance with CSRD and ESRS would also be complying with Law 11/2018 if certain considerations are observed (differences between Law 11/2018 and ESRS).

Guided by this statement, Amadeus has prepared the Non Financial Information Statement and sustainability information 2024 in compliance with the Law 11/2018, of December 28, 2018 on non-financial information statements -in force at the time of publishing this report-, in accordance with the CSRD and based on the European Sustainability Reporting Standards as reporting framework. This report has been completed with certain elements of the law 11/2018, included in *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*.

² Amadeus IT Group, S.A. is the parent company of the Amadeus Group (“the Group”).

sustainability information that relates to business relationships in non-consolidated entities, including Amadeus value chain, is clearly identified as such³.

This Non-Financial Information Statement and sustainability information 2024 uses various information sources, systems and tools of the Group, being guided by the principles of:

- **Relevance.** This report focuses on Amadeus material topics, identified under a double materiality approach. It aims to objectively disclose relevant information related to Amadeus' sustainability performance. See section *ESRS 2 IRO-1- Description of the processes to identify and assess material impacts, risks and opportunities* for more details.
- **Faithful representation.** This document contains complete and accurate information, including appropriate descriptions and explanations. Information is presented as a neutral depiction without bias.
- **Comparability.** This document includes information comparable to disclosures from other companies subject to CSRD⁴ reporting, and/or from those companies that voluntarily have produced the Non-Financial Information Statement and sustainability information 2024 based on the ESRS as reporting framework. As this is the first year that Amadeus voluntarily reports under the ESRS, comparative information from previous periods is not included⁵. Nevertheless, to ensure comparability of those information required by Law 11/2018, the *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)* has been included in this document.
- **Verifiability.** The information included in this report has been verified by a third party. Data used to produce the report have been verified (see section *Independent limited Assurance Report*).
- **Understandability.** This document contains information clear and concise, enabling users to readily comprehend it. For its preparation, Amadeus has avoided generic information and duplication.

Throughout the document, any unit or area of Amadeus will be referred to by its official name within the company (generally in English), except for specific exceptions. Consequently, in these cases, any type of translation of the name of the business unit will be avoided in order to ensure the traceability of the information. This same criterion has been followed to name key aspects in the company, for example, the sustainability strategy, known at Amadeus as *ESG Ambition*.

No information corresponding to intellectual property, know-how or the results of innovation has been omitted to prepare this Non-Financial Information Statement and sustainability information 2024. Nevertheless, the company has decided not to disclose certain information classified as internal. Where applicable, this has been clearly identified as such.

³ In subsequent years, Amadeus will work to expand further the reported information on the value chain, as required by the phase-in provisions of Appendix C of ESRS 1.

⁴ In those European countries in which the directive has already been transposed.

⁵ Amadeus plans to facilitate comparable information in future reports.

ESRS 2 BP-2- Disclosures in relation to specific circumstances

Time horizons

Amadeus has considered short-, medium- and long-term horizons in the assessment of material impacts, risks, and opportunities (IROs), taking into account the following definitions:

- Short horizon: 2024
- Medium horizon: from 2025 up to 5 years
- Long horizon: More than 5 years

When appropriate, such as the climate change risks and opportunities assessment, different time horizons have been considered⁶.

Value chain estimation

The extent to which the reported upstream and/or downstream value chain metrics/data have been estimated is described in the corresponding sections. See section *E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions*.

Amadeus will work to obtain direct value chain data in the coming years. See for instance section *E1 - 3 - Actions and resources in relation to climate change policies* for more details.

Sources of estimation and outcome uncertainty

Along with the Non-Financial Information Statement and sustainability information 2024, Amadeus discloses some estimated metrics based on certain assumptions. In general, the source of the underlying information comes from internal considerations.

In particular, climate change and other environment-related metrics have been calculated directly measuring impacts of the 14 largest Amadeus sites (which represent 68% of total Amadeus workforce worldwide). The impact of the remaining sites has been estimated, based on the average consumption factors of these 14 sites.

More details about sources of estimation and uncertainty are provided in the related information requirements, when relevant.

Changes in preparation or presentation of the sustainability information

The Non-Financial Information Statement and sustainability information of the Group for the year 2024 has been structured based on the ESRS. As indicated, the report has been completed with certain elements of the law 11/2018. The main ones are:

- Double materiality assessment. In 2024 Amadeus updated its materiality assessment following the principles of double materiality in accordance with the procedures set out by the European Financial Reporting Advisory Group (EFRAG) in the guidelines on double materiality⁷. This update has been carried out in order to take into consideration the different steps as described by the EFRAG and, particularly, to include the value chain in the process. See section *ESRS 2 IRO-1- Description of the processes to identify and assess material impacts, risks and opportunities* for more details.
- Restructuring the sustainability disclosure following the ESRS. Specifically, the following has been included:

⁶ See section *ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities*.

⁷ EFRAG (2024). *Materiality Assessment Implementation Guidance (EFRAG IG 1)*, available at https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2FIG%201%20Materiality%20Assessment_final.pdf

- ESRS 2 standard to prepare this section on general information.
- ESRS topical standards for each material sustainability topic, including a description of material IROs and the related policies, actions, metrics and targets to address them. The minimum disclosure requirements, as outlined in ESRS 2, have been the based for reporting entity-specific.
- Recognized sustainability reporting frameworks, such as the Global Reporting Initiative (GRI) have been used to report information required by the law 11/2018 and not covered fully or partially by the ESRS. See *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*
- In light of the inclusion of new disclosures and metrics, comparative figures have been reported solely for those metrics mandated by law 11/2018, as outlined in *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*. This approach aligns with the transitional provisions outlined in ESRS 1 for presenting comparative information, as well as the obligatory requirement to provide comparable information as stipulated by law 11/2018.

Some minor updates have been made in some disclosure requirements or individual metrics:

- The climate risk and opportunity assessment has been updated, as described in section *ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities*.
- In 2024 Amadeus greenhouse gas emissions inventory has been reviewed and some adjustments were made following the requirements of the Science Based Targets initiative (SBTi). Amadeus obtained validation from SBTi for its near-term and net-zero science-based targets in June 2024. See section *ESRS E1 - Climate change* for further details.

The updates above are described in the notes to the respective metrics/information.

[Disclosures related to other legislation or generally accepted sustainability reporting standards](#)

The Consolidated Non-Financial Information Statement and sustainability information 2024 includes information required by additional regulations⁸:

- The Regulation EU 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.
- Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmark.
- Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 .
- Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks.
- Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published.

⁸ See, for instance, section *IRO-2- Disclosure Requirements in ESRS covered by the undertaking's sustainability statement*.

References to other disclosed information

Some ESRS disclosure requirements are closely linked to other sustainability requirements to which Amadeus is already subject to. The information responding to these requirements has also been incorporated in this document (for instance, the integration of sustainability in performance incentive schemes (GOV-3), described in the Directors Remuneration report as well).

Additionally, cross references to the related line item or disclosure in the consolidated annual accounts have been introduced, when applicable.

Use of phase-in provisions

Amadeus has adopted transitional measures for the preparation of this Non Financial Information Statement and sustainability information 2024 as contemplated in ESRS 1 (transitional and phased-in provisions). Specifically:

ESRS	Disclosure requirement	Full name of the Disclosure Requirement	Use of phase-in provisions
ESRS 2	SBM-1	Strategy, business model and value chain	Breakdown of total revenue by significant ESRS sectors will be reported when the European Commission adopts the corresponding delegated act.
ESRS 2	SBM-3, par 48	Material impacts, risks and opportunities and their interaction with strategy and business model	Anticipated financial effects of Amadeus material risks and opportunities will be reported in future reports.
ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Amadeus has opted to use the phase-in allowance regarding the financial effects from material physical and transition risks and potential climate-related opportunities, given the complexity and uncertainty of the calculations of these financial effects. Nevertheless, the company provides the related qualitative information in this report. See sections <i>SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model</i> and <i>ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>
ESRS S1	S1-11	Social protection	Amadeus plans to disclose the relevant information in forthcoming reports.

Updating disclosures about events after the end of the reporting period

No critical or material events occurring on or after January 1st, 2025, and up until the publication of this report, have been included in the Non-Financial Information Statement and sustainability information 2024.

Governance

ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies

The Board of Directors is Amadeus' highest representative, administrative, managerial and controlling body. It sets out the company's general guidelines and economic objectives (financial and non-financial) and carries out the company's strategy (steering and implementation of company policies), supervision activities (management control) and communication functions (liaising with shareholders).

The Spanish Capital Companies Act also gives further powers to the Board of Directors, some of which are non-delegable. In this regard, the Board of Directors is the responsible body for policies on, among others:

- Corporate Social Responsibility.
- Dividends.
- Risk management and control (including fiscal risks).
- Corporate governance.
- Tax strategy.
- Related-party transactions (other than those reserved for the General Shareholders' Meeting), with delegation faculties under certain circumstances.

Moreover, it is responsible for the definition of the company's sustainability policy (relating to environmental, social and corporate governance matters, among others) and that of the Group; its organization and functioning and, in particular, the approval and amendment of its own regulations.

Additionally, among its responsibilities lie risk management, which includes transition and physical risks related to climate change and other sustainability related risks. The Board also reviews and approves Amadeus' sustainability strategy.

Amadeus recognizes and embraces the benefits of having a diverse Board and sees increasing diversity of knowledge, experience, and gender at Board level as an essential element in the continued improvement of the Board's effectiveness. The Board includes and makes good use of differences in its Directors' skills, regional and industry experience, background, race, gender and other distinctions. These are considered in determining the optimum composition of the Board and are balanced appropriately. Board appointments are made on merit in terms of skills, experience, independence and knowledge that can contribute to the Board's effectiveness.

The Board of Directors of Amadeus is composed of a minimum of five (5) and a maximum of fifteen (15) members. As of December 31, 2024, it consists of a total of eleven members, one executive director, Mr. Luis Maroto Camino, President and CEO of Amadeus, and ten external non-executive directors, all of them independent (90.9%)⁹: ESRS 2-GOV-1 p. 21 e

- Female Directors represent 45.45% of the members of the Board of Directors as of December 31, 2024. ESRS 2-GOV-1 p. 21 d
- Six (6) nationalities are represented on the Board.
- The age of the members of the Board ranges from 50 to 70.

Members of the Board of Directors are appointed by resolution of the General Shareholders' Meeting for an initial period of three years. After this, they can be re-elected for additional periods of one year, with no limit.

Amadeus has had a Directors' Selection Policy in place since 2016, which was updated in 2022 with the June 2020 recommendations from the Spanish Good Governance Code of Listed Companies. This selection process looks at a range of factors, including but not restricted to:

- The business's current strategy;
- The Board's composition, especially its members' industry, functional and geographic experience;
- The Board's diversity, especially but not limited to gender diversity.

⁹ Amadeus does not have board-level employee representation since it is not applicable in the Spanish legislation.

The financial and industry expertise, broad management skills and dedication of Directors have contributed significantly toward the quality and efficiency of the Board's operations and committees. Among the Board members there is a diversity of professional experience, competencies and background, as it is evidenced in the self-assessment that the Board of Directors carries out every year¹⁰.

Therefore, most members of the Board possess expertise, competencies and/or relevant experience in the sectors in which Amadeus operates, in sustainability matters and in business conduct matters. Those skills and expertise are key to properly monitor and oversee sustainability matters.

Additionally, the members of the Board of Directors continually develop and update their knowledge through tailor-made training sessions. In this regard, in 2024 a training plan of four (4) sessions, that included sustainability matters, was carried out. In particular, a training session in the Corporate Sustainability Reporting Directive (CSRD) was held in October 2024. Also, training sessions in Artificial Intelligence and Cybersecurity were also held during the year. Furthermore, the Board constantly monitors sustainability matters (with annual information updates) as well as Risk and Compliance and Cybersecurity matters (with half-year information updates), among others.

Moreover, the Board of Directors or its Committees may receive assistance from internal or external subject experts to discuss matters (of certain importance and complexity) in their meeting sessions (see section *ESRS 2 GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies*).

Composition of the Board of Directors

Name of Director	Director category	Position on the Board	Member of Committees ¹	Diversity		
				Gender	Nationality	Age distribution
Mr. William Connelly	External Independent	Chair		Male	French	>65
Mr. Stephan Gemkow	External Independent	Vice-Chair	AUDIT (Chair)	Male	German	60-65
Mr. Luis Maroto Camino	Executive Director	CEO		Male	Spanish	60-65
Mrs. Pilar García Ceballos-Zúñiga	External Independent	Director	AUDIT, REMCO	Female	Spanish	60-65
Mr. Peter Kürpick	External Independent	Director	REMCO	Male	German	55-60
Mrs. Xiaoqun Clever-Steg	External Independent	Director	REMCO	Female	German	50-55
Mrs. Jana Eggers	External Independent	Director		Female	US	55-60
Mrs. Amanda Mesler	External Independent	Director	AUDIT REMCO (Chair)	Female	US	60-65
Mrs. Eriikka Söderström	External Independent	Director	AUDIT	Female	Finnish	55-60
Mr. David Vegara Figueras	External Independent	Director	AUDIT	Male	Spanish	55-60
Mr. Frits Dirk van Paasschen	External Independent	Director	REMCO	Male	US/Dutch	60-65

¹ AUDIT: Audit Committee; REMCO: Nominations and Remuneration Committee.

The Board of Directors is supported by the Audit Committee and the Nominations and Remuneration Committee (consisting of five non-executive Directors each), both with responsibility over sustainability matters. In this regard, the Audit Committee of the Board supervises compliance with

¹⁰ No members of the Board of Directors, Executive Management Group or management team of Amadeus have held roles in public administration or regulatory bodies in the two years prior to the 2024 reporting period.

Amadeus' sustainability strategy and related policies, including the company's performance. This process is carried out on a recurrent basis.

As reflected in the Regulations of the Audit Committee of Amadeus IT Group, S.A, the fundamental responsibilities of the Audit Committee are to advise the Board of Directors and supervise, without intervention in the execution or management of the company's Senior Management and executive bodies. In this regard, the Audit Committee is responsible for, among others¹¹:

- the “supervision of financial and non-financial information” (which includes, among others, to supervise the reporting information related to sustainability matters and the effectiveness of control and risk management systems, evaluating the progress and degree of advancement of the sustainability plans and objectives established by the Board of Directors, both operational and strategic).
- the “supervision of the management and control of the financial and non-financial risks” (which includes, among others, to supervise the effectiveness of internal control and risk management systems as a whole, embracing both financial and non-financial risks, including operational, technological, legal, sustainability, political and reputational or those related to corruption).
- the “supervision of internal audit” (which includes, among others, to supervise the internal audit plan, verifying that the plan covers the main financial and non-financial risks, and reflects suitable coordination with other existing assurance functions, such as risk management and control and regulatory compliance, as well as with the statutory auditor and the sustainability assurance provider).
- the “relations with the statutory auditor and with the sustainability assurance provider” (which includes, among others, to review, in conjunction with the statutory auditor and the sustainability assurance provider, the content of the reporting information related to sustainability matters, the audit report and of the additional report accompanying the audit work).
- moreover, it is responsible for supervising the compliance with the company's policies in sustainability related matters, and internal rules of conduct.

The Nominations and Remuneration Committee also includes among its responsibilities some sustainability matters, among which are the following¹²:

- to favor diversity of knowledge, experience, age and gender and, with respect to gender, to establish a goal for representation of the gender least represented on the Board of Directors, and develop guidance on how to achieve that goal;
- to evaluate the competence, knowledge and experience necessary in the members of the Board of Directors, analyze the other activities of each Director and specify the required profile and capacities;
- to draw up a matrix of the Board's competencies, which will be reviewed on a regular basis, depending on the challenges and opportunities that the company is expected to face in the short, medium and long term;
- to set-up sustainability goal achievements of the company as part of the variable remuneration of the executive management team, and the employees in general.

¹¹ See “Regulations of the Audit Committee of Amadeus IT Group, S.A”, section “4”, available at Amadeus website (<https://corporate.amadeus.com/documents/en/investors/all-years/annual-general-meeting/regulations-of-the-audit-committee.pdf>).

¹² See Art. 6 of the “Regulations of the Nominations and Remuneration Committee of Amadeus IT Group, S.A”, regarding to the Committee responsibilities, available at Amadeus website (<https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/regulation-remco-december23.pdf>).

Having the Amadeus CEO serve as the Executive Director of the Board of Directors strengthens the communication between the Board and the company's management team, enhancing the efficiency of the Board's decision-making process. Since February 2022, Amadeus' President and CEO has taken, on a transitory basis, direct responsibility for sustainability matters, supported by a dedicated team that oversees company-wide sustainability initiatives.

In 2024, Amadeus established the ESG Steering Committee to review the status of and compliance with the company's ESG strategy and make key strategic decisions related to sustainability. This committee is a delegated advisory and decision-making body of the Amadeus Executive Committee and consists of 15 members, including two from the Executive Committee. The committee's sponsor, the Senior Vice President and General Counsel of Amadeus, reports to the Executive Committee and/or the CEO on any significant issues raised during ESG Steering Committee meetings. The Executive Committee serves as the final authority on decisions.

The ESG Steering Committee is tasked with identifying impacts, risks and opportunities, recommending and validating mitigation actions, prioritizing opportunities, and facilitating execution. In terms of long-term goals and targets, this committee is responsible for recommending goal adjustments and monitoring progress toward achieving them.

Finally, the Sustainability Office oversees the company's progress on sustainability, ensuring alignment with Amadeus' sustainability ambitions, and adapting to market trends and requests. It is responsible for developing the sustainability strategy, implementing key projects, managing sustainability reporting, and making critical sustainability decisions, leveraging both the ESG Steering Committee and the Executive Committee to drive Amadeus' sustainability efforts forward.

Sustainability responsibilities

Board of Directors

- Reviews and approves Amadeus' sustainability strategy.
- Ensures compliance with those additional sustainability related principles that the company decides to adopt.
- Approves the sustainability policy of the company and of the Group, its organization and functioning and, in particular, the approval and amendment of its own Regulations.
- Defines the policy for management and control of risks, and supervision of the internal information and control systems.
- Risk management (which includes transition and physical risks related to climate change and other sustainability related risks).

Audit Committee

- Supervises financial and non-financial information (which includes, among others, to supervise the reporting information related to sustainability matters and the effectiveness of control and risk management systems, evaluating the progress and degree of advancement of the sustainability plans and objectives established by the Board of Directors, both operational and strategic).
- Supervises the management and control of the financial and non-financial risks (which includes, among others, to supervise the effectiveness of internal control and risk management systems as a whole, embracing both financial and non-financial risks, including operational, technological, legal, sustainability, political and reputational or those related to corruption).
- Supervises the internal audit (which includes, among others, to supervise the internal audit plan, verifying that the plan covers the main financial and non-financial risks, and reflects suitable coordination with other existing assurance functions, such as risk management and control and regulatory compliance as well as with the statutory auditor and the sustainability assurance provider).
- It is responsible for the "relations with the statutory auditor and with the sustainability assurance provider" (which includes, among others, to review, in conjunction with the statutory auditor and the sustainability assurance provider, the content of the reporting information related to sustainability matters, the audit report and of the additional report accompanying the audit work).
- Supervises the compliance with the company's policies in sustainability related matters, and internal rules of conduct.

Nominations and Remuneration Committee

- Favors diversity of knowledge, experience, age and gender and, with respect to gender, to establish a goal for representation of the gender least represented on the Board of Directors, and develop guidance on how to achieve that goal.
- Evaluates the competence, knowledge and experience necessary in the members of the Board of Directors, analyzes the other activities of each Director and specifies the required profile and capacities.
- Draws up a matrix of the Board's competencies, which is reviewed on a regular basis, depending on the challenges and opportunities that the company is expected to face in the short, medium and long term.
- To set-up sustainability goal achievements of the company as part of the variable remuneration of the executive management team, and the employees in general.

President & CEO:

Holds the highest level of responsibility within Amadeus management team regarding sustainability, including climate change-related issues.

Executive Committee

Acts as final validator of decisions made by the ESG Steering Committee.

ESG Steering Committee

- Acknowledges regulations and standards and validates mitigation actions and facilitates execution.
- Acknowledges risk management updates, recommends and validates mitigation actions, and facilitates execution.
- Approves relevant policies.
- Recommends evolution of long-term goals and targets.
- Prioritizes investment opportunities and advocates for budget allocation.
- Reviews proposals for ESG Governance structure.
- Influences communication.

Sustainability Office

- Defines Amadeus sustainability ambition, strategy and proposes targets.
- Identifies & analyzes regulations and standards.
- Identifies gaps and proposes mitigation actions.
- Elaborates policies, proposes approval process for relevant policies.
- Prepares and coordinates the sustainability reporting materials.
- Defines goals and monitors execution of sustainability ambition and progress towards targets.
- Identifies opportunities to uplift Amadeus' ambition and qualify opportunities.

Areas/Units at Amadeus

- Sustainability is cascaded through the organization: action owners across Amadeus are in charge of executing actions.

ESRS 2 GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

As included in the Regulations of the Board of Directors, the Board on a plenary basis is responsible for approving the company's strategy, the organization for its implementation, as well as the supervision and control of the company's management in order to ensure that it complies with the objectives set and respects the corporate object and interest.

This strategy has been defined by a set of strategic pillars for the company, guided by its material topics and values, and based on operating pillars, sustainability among others (see *Sustainability-related goals*, in section *ESRS 2 SBM-1- Strategy, business model and value chain*, for more details). This is how Amadeus embedded sustainability topics, and the related impacts, risks and opportunities, into the core of the strategy, operations, and culture of the Group. Furthermore, this explains the mechanism used by the Board of Directors to consider sustainability matters while overseeing the Amadeus strategy.

Additionally, the Board of Directors monitors and discusses the progress on sustainability matters¹³ at least once a year (through information updates), with the assistance of the Head of the Sustainability Office, in addition to individual updates as deemed necessary by relevant functional owners. Thus, the Board provides feedback that influences the development of relevant sustainability initiatives and, if required, decides upon these matters.

In 2024, the Board discussed a broad range of sustainability issues, including a training session, held in October 2024, about the CSRD and the ESRS. During this session, the double materiality assessment process and its results were discussed, among others. Moreover, as previously indicated, the Board constantly monitors sustainability related issues (with annual information updates) as well as Risk and Compliance and Cybersecurity issues (with half-year information updates), among others. Also, training sessions in Artificial Intelligence and Cybersecurity were also held during the year.

Throughout the year, the Audit Committee of the Board has supervised compliance with Amadeus' sustainability strategy and related policies, including the company's sustainability performance. In this regard, it has also included Risk and Compliance matters on the agenda of its ordinary meetings, which dealt in detail with risks, including sustainability related risks and non-financial information risks and control, among others, in order to identify the top risks, trends and the mitigating actions to put in place, in case required (see section *GOV-5 – Risk management and internal controls over sustainability reporting* for more information about the Amadeus risk management framework). The Audit Committee has also supervised compliance with Amadeus policies regarding ethics and business conduct matters occurred throughout 2024.

As for the Nominations and Remuneration Committee, it has also included matters linked to sustainability in its sessions. In particular, they were mainly related to the analysis of diversity on the Board of Directors (as regards to knowledge, experience, age, gender and competencies of Board members, among others) and related topics.

The list of the specific material impacts, risks and opportunities addressed by the Board of Directors and its Committees during 2024 is detailed in section *4. Impact, Risk and Opportunities Management*.

¹³ See section *ESRS 2 SBM-1- Strategy, business model and value chain* for more details.

GOV-3 – Integration of sustainability-related performance in incentive schemes

Remuneration of the Board of Directors is set in line with the Directors' Remuneration Policy 2022-2024. This Policy has been updated for the fiscal years 2025-2027 and approved at the 2024 General Shareholders Meeting, to be effective January 1, 2025^{14,15}.

- Amadeus includes sustainability-related metrics in the annual incentive scheme for the Executive Directors¹⁶. The total remuneration for the Executive Director is based on non-performance elements (fixed remuneration) and performance elements (i.e. variable pay).

Total remuneration for the Executive Director		
Non performance elements	Variable pay	
Fixed remuneration - Base Salary - Pension arrangements - Benefits - Director's fees	Short-term incentive – Annual Bonus Payable in cash or in combination of cash and shares which may be subject to deferral conditions	Long-term incentive Plans settled in shares, cash or combination of both, which vest on service and performance conditions
Consistently rewards the level of responsibility, leadership and performance within the organisation, promotes the retention of key staff, attracts the top talent and creates sufficient economic independence to balance the significance of other items of remuneration.	Rewards the achievement of a combination of financial and non-financial, which are consistent with the strategy and aligned to stakeholder interests	Linked to metrics aligned with Amadeus' long-term priorities (mainly financial and value creation measures). A minimum 3-year performance period.

The 2024 performance objectives for the short-term incentive – Annual Bonus - included financial and non-financial goals (see picture above): financial goals had a weighting of 88%, and sustainability goals with a weighting of 12%. The latter consisted of metrics related to Amadeus environmental, social and governance ambitions.

- Financial: revenue, EBITDA, adjusted earnings per share (EPS).
- Sustainability¹⁷. Each metric is selected from the broad catalog of sustainability targets. Consequently, there is a clear alignment to the sustainability strategy of Amadeus:
 - Electricity consumption per full-time equivalent worker.
 - Scope 1+2 emissions in line with the carbon neutrality by 2025 objective.
 - Community investment.
 - Employee Learning & Development training hours per employee.
 - Cybersecurity training completion.

The selected metrics by the Nominations and Remuneration Committee are quantitative, auditable and align management to goals that are currently in the Amadeus sustainability strategy. The performance measures agreed are aligned with the short-term objectives of the company and the metrics have been established in accordance with these priorities.

¹⁴ This information is consistent with the remuneration report prescribed in articles 9a and 9b of Directive 2007/36/EC on the exercise of certain rights of shareholders in listed companies.

¹⁵ Consequently, the updated Policy did not impact the remuneration decision for 2024 compensation.

To elaborate the updated policy, the Nominations and Remuneration Committee asked two consultancies, Willis Towers Watson and Deloitte, to provide with research on remuneration policies, both practice from similar companies and the latest published guidance. Furthermore, market practice and best practices in remuneration principles have strongly influenced our new Policy. Institutional investor guidelines and recommendations have been considered along with Company needs as well.

¹⁶ As of December 31, 2024 the only director that has executive functions is the Chief Executive Officer of the Company.

¹⁷ These metrics were discussed by the Nominations and Remuneration Committee at the December 2023 session.

At the end of 2024 and beginning of 2025, the Nominations and Remuneration Committee has reviewed performance against targets and determined that a payout is appropriate considering the level of achievement in relation to target¹⁸.

- With respect to the remuneration of the Non-Executive Directors, it consists of a fixed fee. The Chairman and Non-Executive Directors do not participate in any incentive linked to Company performance or pension plans, nor are they entitled to attendance fees. Only verified travel and overnight accommodation expense incurred in attending Board meetings and/or any Board committee meetings are reimbursed.

Additionally, Amadeus includes sustainability-related performance in the incentive scheme for the wider workforce. The sustainability metrics in the Executive Director Annual Bonus are also present in bonus scheme for Amadeus staff and management.

GOV-4 – Statement on due diligence

In 2023, Amadeus started to update its due diligence process in the field of human rights and environment, following the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, with the support of an external expert.

The goal of this process is to prevent and mitigate potential human rights and environmental impacts in which Amadeus and its value chain, with special focus on third parties, might be involved in, while meeting the expectations and requirements of relevant stakeholders, including incoming regulation¹⁹.

This first approach included the following steps:

- Broad identification of actual and potential impacts on human rights and the environment of Amadeus own operations and its value chain and prioritization of general areas where adverse impacts are more likely to occur and be more severe.
- Evaluation of the effectiveness of implemented control measures.
- Recommendations for future improvements and next steps.

During 2024, Amadeus continued to evaluate and prioritize potential adverse impacts on human rights by introducing and aligning them with the double materiality assessment process. Additionally, at the end of 2024 a project kicked off to evaluate and improve the stakeholder engagement when assessing impacts and risks, including human rights related. Additionally, human rights continue to form part of Amadeus' risk management framework.

The following table provides a mapping of how Amadeus applies the core elements of due diligence. Additionally, information about Amadeus' due diligence process is included in the corresponding sections of this Statement, when applicable.

¹⁸ The Nominations and Remuneration Committee approves and reports to the Board on their compliance against targets and their definition. The Board of Directors oversees these aspects through the committee reports and approves the proposal of the Director's Remuneration Report to be submitted to the General Shareholders' Meeting for an advisory vote, pursuant to article 541.4 of the Spanish Capital Companies Act, which forms part of the stand-alone and consolidated Directors' Report.

¹⁹ The Directive (EU) 2019/1937 (Corporate Sustainability Due Diligence Directive), approved by the European Parliament on April 2024. This Directive has entered in force on July 26th 2024, after being formally endorsed by the Council, signed and published in the European Union Office Journal.

Core elements of sustainability Due Diligence

ESRS 2-GOV-4 p. 30

Embedding due diligence in governance, strategy and business model

More details at:
ESRS 2 GOV-2
ESRS E1-1
ESRS S1-1
ESRS G1-1
ESRS G1-2

Due diligence procedure is incorporated in business processes through Amadeus' policies and rules, including, among others:

- Sustainability policy,
- Human Rights Policy,
- Environmental Policy,
- People Policy,
- Anti-Bribery & Anti-Corruption Policy,
- Code of Ethics and Business Conduct,
- Community Impact and Charitable Donations Policy
- Group Purchasing Policy.
- Amadeus Code of Ethics and Business Conduct for third parties.
- Enterprise Risk Management Policy.
- The Sustainability Strategy - "ESG Ambition", which includes Amadeus' ESG strategy for the years 2023-2025.

In 2024, the Human Rights policy has been renewed.

This Policy takes as a reference the United Nations Global Compact, the Universal Charter of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UNGPs and the European Social Charter and the OECD Guidelines for Multinational Enterprise.

The Policy establishes the main Amadeus human rights commitments, toward its employees, society and local communities, and supply chain and third parties:

- Particularly, the updated policy recognizes commitments towards society and local communities regarding:
 - Privacy and cybersecurity.
 - Clean, healthy and sustainable environment.
 - Minority and community rights.
 - Fight against corruption and bribery.
- Amadeus has also reinforced its commitment to respect human rights in Amadeus supply chain. Amadeus' suppliers are requested to comply with the principles in the Human Rights Policy, alongside the principles of the Code of Ethics and Business Conduct for Third Parties.

Additionally, the Policy also includes the Company's commitment to conduct human rights due diligence, internally and externally. Finally, it lays the consequences of non-compliance, conflicts with local laws and regulations and the related governance and accountability mechanisms.

The Human Rights Policy has been approved by the ESG Steering Committee. For its part, the Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the company's policies and rules in the environmental, social and corporate governance area and receiving assurances from management that the Company's environmental and social practices are in accordance with the established strategy and policy.

Engaging with affected stakeholders in all key steps of the due diligence

More details at:
ESRS 2 SBM-2
ESRS 2 IRO-1
ESRS S1-2
ESRS G1-2
Annex - Societal information
Annex - Customer services

Stakeholders have access to up-to-date information about the Company, primarily through publications and channels, containing financial and non-financial information, available at the Amadeus' website.

Additionally, Amadeus engages in dialogue with its stakeholders on a regular basis, based on their needs, using different communication channels.

As indicated above, at the end of 2024 a project kicked off to map Amadeus stakeholders and communication channels with the aim of improving its stakeholder engagement when assessing impacts and risks, including Human Rights.

Identifying and assessing adverse impacts

More details at:
ESRS 2 IRO-1
ESRS 2 SBM-3
ESRS 2 - SBM-3-E1
ESRS 2 - SBM-3-S1
ESRS 2 - IRO 1 - G1
ESRS 2 - SBM-3 - G1 - Tax transparency
ESRS 2 - SBM-3 - G1 - Cybersecurity
ESRS 2 - SBM-3 - G1 - Data privacy
ESRS G1-2

Due diligence process involves the analysis of potential adverse impacts on human rights and the environment from Amadeus' own activities and its value chain. It starts by an initial identification of the impacts, classified in six themes that cover topics outlined in the ESRS:

- Climate change,
- Environmental management,
- Labor, including diversity, equity, and inclusion,
- Cybersecurity,
- Ethics and integrity,
- Social responsibility.

As a result, three types of adverse impacts have been identified, including those arising from business relationships: impact caused, contribution impact, impact linkage.

Following this, an assessment of negative impacts based on scale, scope, remediability nature and probability was carried out by external consultants. As a result of this evaluation and prioritization, a preliminary prioritization matrix of the potential themes of the identified adverse impacts was obtained. On this basis, during 2024, Amadeus continued to evaluate and prioritize potential adverse impacts on human rights by introducing and aligning the evaluation of related impacts in the double materiality assessment process, as indicated above.

Additionally, it is important to mention that Amadeus currently uses specific tools for conducting due diligence on potential suppliers and third parties, as well as ongoing monitoring and sanctions screening, including a human rights risk assessment of high risks. The current third-party risk management process and related tool are being enhanced to regularly analyze the human rights and environmental issues that are applicable to Amadeus. If necessary, Amadeus will introduce mechanisms to assess the risk of breach of human rights and environmental issues. Commitment to human rights is also an aspect Amadeus takes into account in its merger and acquisitions procedures. Finally, it is important to mention that human rights continue to form part of Amadeus' risk management framework.

Taking actions to address adverse impacts More details at: ESRS 2 MDR-A (including entity-specifics) ESRS E1 - 3 ESRS S1 - 4 ESRS G1 - 1 ESRS G1 - 2 ESRS G1 - 3	Based on regular analysis and impact assessments, Amadeus designs, implements and monitors concrete measures to prevent and mitigate potential adverse identified human rights and environmental impacts, derived from both the Group's operations and the entire value chain. These may include: • Prevention measures, such as the Company's internal rules and policies. In this regard, Amadeus internal units safeguard compliance with internal rules, procedures and external regulations. Additionally, they identify areas for improvement. Specific actions complement these policies and rules (for instance, training and awareness activities, monitoring actions, etc). • Detection and/or mitigation procedures, which determine the information required and the way to act in situations that involve breaches and/or practices contrary to Amadeus' values and principles. These preventive and mitigation measures are embedded in business processes. In relation to third parties (suppliers, contractors), the main tools to prevent the materialization of risks on suppliers and contractors are: • The Code of Ethics and Business Conduct for Third Parties sets out the commitments that Amadeus business partners must make in terms of human rights and the environment. Additionally, the Environmental Policy, the Human Rights and the Anti-Bribery and anti-corruption Policy of Amadeus include obligations applying directly to business partners. • Supply chain management based on risk assessment, according to the Due Diligence procedures. The assessment of suppliers includes issues related to ESG practices, including human rights, environmental and anti-corruption aspects, that can even exclude suppliers in the event of an unsatisfactory response. • Imposition of obligations on suppliers and other third parties with regard to sustainability topics.
Monitoring the effectiveness of these efforts and communication More details at: ESRS S1 - 3 ESRS G1 - 1 ESRS S1 - 17	Amadeus has a Speak Up Channel available through the corporate website and the intranet. This channel enables communications from Amadeus employees and other stakeholders and is regulated by the Speak Up Policy. The communications received by this channel may (i) be investigated by Amadeus; (ii) be referred to an external third party (law firm or consultant); or (iii) be referred to public authorities. At the end of an investigation, if Amadeus determines that a violation has occurred, appropriate disciplinary or legal action will be taken against the violator(s), depending on the severity of the violation. Amadeus has designated Corporate Compliance and Investigations as an impartial department, free of conflicts of interest, competent to receive and follow up on complaints received through the Speak Up Channel. To ensure the proper use of this channel, online training is provided to Amadeus employees. Additionally, training and awareness activities are facilitated to employees in other related sustainability topics. In relation to the accessibility of the information, through the Non-Financial Information Statement and sustainability information and the Amadeus Global Report, both published in the Amadeus website, the company informs about the main concerns received by the whistleblower channel during the year. During 2024, there is no record of any human rights violations received through the Speak Up Channel or otherwise, so no remedial action was required in this area.

Amadeus will continue to improve the systematic implementation of the human rights and environmental due diligence in its business processes, in compliance with the UNGP and OECD guidelines.

GOV-5 – Risk management and internal controls over sustainability reporting

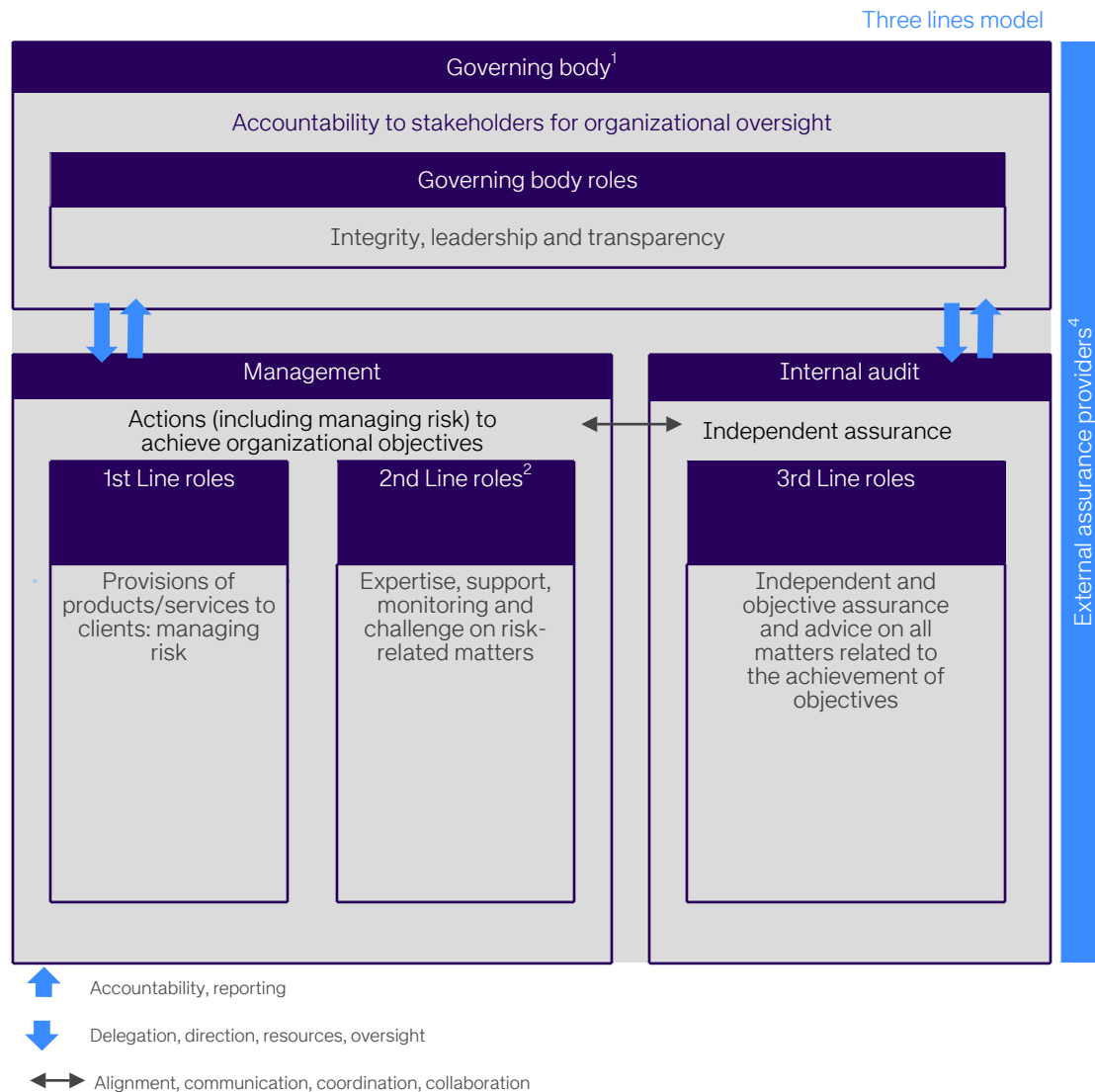
Amadeus' management has endorsed a Risk Management Framework to identify the main risks the Group faces, the effective controls to mitigate them, and information systems for their periodic monitoring. This framework has been developed based on awareness of the principles set out in the COSO ERM and ISO 31000 risk management frameworks, as well as best practices to ensure that risks are identified, analyzed, evaluated, managed, controlled, and monitored systematically.

The Enterprise Risk Management Policy, applicable to all Amadeus Group majority-controlled companies in relation to all their activities, processes, projects, products and services, sets out the basic principles of the risk management framework and focuses on:

- Achieving its long-term objectives;
- Contributing to the maximum level of assurance to shareholders and clients to defend their respective interests;
- Protecting the Group's earnings;
- Protecting the Group's image and reputation;
- Maintaining Corporate stability and financial strength sustained over time, involving every member of the Group.

The ultimate purpose of the Enterprise Risk Management Policy is to have a record and a map of the risks that could compromise the achievement of the strategic objectives of the Group. This risk analysis is a fundamental element in the Group's decision-making processes, both in the sphere of governing bodies as well as in managing the business, with senior management assessing and monitoring the most critical risks on a recurring basis.

Amadeus formally adopted the Three Lines of Defense Model ('Three Lines Model') with the endorsement of the Board and the Executive Committee.



¹ Roles of the Board of Directors

² Roles typically but not exclusively present within the following functions: Enterprise Risk Management, Corporate Compliance, Business Resilience and IT Controls Governance, Corporate Information Security Office, Data Privacy, Legal, Group Internal Control and People & Culture. These functions can also have 1st Line roles, and provide direction and oversight on 1st Line roles.

³ Roles of Group Internal Audit.

In relation to the roles and responsibilities in Risk Management:

- The Board of Directors is responsible for approving the risk management and control policy, including tax, financial and non-financial risks, as well as the periodic monitoring of internal reporting systems and controls.

- The Audit Committee:
 - Assesses the effectiveness and integrity of the management and control function of the financial and non-financial risks. To that end, the Audit Committee must receive regular reports from Company's Management on the functioning of existing systems and on the conclusions of any tests conducted on such systems by internal auditors or by external third parties.
 - Supervises the effectiveness of internal control and risk management systems as a whole, embracing both financial and non-financial risks (including operational, technological, legal, sustainability, political and reputational or those related to corruption), ensuring that risk supervision is included in Committee Meeting agendas so that significant financial and non-financial risks can be analyzed over the course of the year, reassessing the list of risks and the level of tolerance established for each risk, identifying emerging risks, and meeting at least annually with the officers heading up the risk and compliance area in order to analyze the risk map.
 - Supervises the internal audit area.
 - Supervises relations with the statutory auditor and with the sustainability assurance provider.
 - Supervises the compliance with the Company's policies in sustainability related matters, and internal rules of conduct.
- The Risk Steering Committee is a decision-making body empowered by the Executive Committee to provide oversight and guidance on risk management activities and issues across the Amadeus Group, including risk assessment and prioritization, risk mitigation strategies and crisis responses.
- The Risk Assessment Group is an ad-hoc collegial decision-making group commissioned specifically under the approved Terms of Reference for the Risk Steering Committee which can be convened to judge a specific issue and escalate it to the Risk Steering Committee if required.
- For its part, the business units (executive management, management, and staff) assess, control and mitigate risk and report the risk assessments made in their scope of business.
- The Enterprise Risk function oversees and facilitates the implementation of effective risk management practices by the first and second lines and assists those responsible for risk in communicating appropriate risk information throughout the organization. This unit is responsible for an annual risk mapping to identify the Company's top risks (Corporate Risk Map), in order to review controls and implement appropriate treatment plans.
- Group Internal Audit supports the Audit Committee in assessing the effectiveness of Amadeus' internal control and risk management systems, providing the Audit Committee and management with independent, risk-based and objective assurance, advice, insight and foresight. Internal Audit covers significant risk exposures and control issues, including fraud risks, governance issues, and other areas of focus for the Audit Committee, at any of the Amadeus activities, assets and personnel.

Risks are classified into the following categories:

- Strategic: Risks related to Amadeus objectives.
- Financial: Financial risks relative to market, credit, interest, liquidity, reporting, internal systems, planning, funding, etc.

- Legal and Compliance: Risks resulting from violations of laws, regulations, codes of conduct, or organizational standards.
- Operational: Risks resulting from inadequate or failed internal processes, people, including talent, and systems, or from external events or IT service failures.
- Sustainability: Risk related to environmental, social and people, business conduct and ethical aspects not included in the Legal and Compliance risks category.

Sustainability related-risks are embedded in the overall risk management and internal control processes and systems. Control activities are embedded in the company areas.

Risk management and internal control processes and systems in relation to sustainability reporting

In 2024, Amadeus' Group Internal Control unit has started to develop an internal control environment model -Internal Control over Sustainability Reporting (ICSR) matrix-, based on COSO (Committee of Sponsoring Organizations of the Treadway Commission)²⁰. The same consolidation scope applied in the Amadeus consolidated annual accounts and in the Non-Financial Information Statement and sustainability information 2024.

Amadeus ICSR model contains a sustainability risk and control matrix for the Group that includes the material sustainability topics and the entity specifics identified through the double materiality assessment (see section *SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model*). The structure of the ICSR Matrix includes the control objective, related risks, control descriptions and evidences.

The Amadeus risk assessment process, as described in section above, aims to establish and maintain an effective process to identify, analyze, and manage related risks, including sustainability risks. Through this process, Amadeus has found that its exposure to non-financial information reporting risks could potentially result in fraud, greenwashing and lack of disclosure of relevant information. To mitigate them, several actions have been implemented²¹.

One of the key measures is the establishment of the ICSR, as detailed above. For its part, the Internal Control Unit uses a methodology that starts from the analysis of the double materiality assessment. Once the risks in the sustainability information have been identified, approvals, authorizations, verifications, reconciliations, segregation of duties, and responsibilities of the information provided are also identified.

In this regard, a governance model has been adopted to define the roles and responsibilities in sustainability reporting. Therefore, each unit understands its own role in sustainability reporting and provides the relevant information.

The Sustainability Office at Amadeus is accountable for producing the consolidated Non-Financial Information Statement and sustainability information 2024, using a specific sustainability reporting software. To do so, several initiatives have been carried out from the beginning of the process, according to an internal plan (workshops with units involved, defined process to gather the required

²⁰ To do so, a three lines of defense model has been established. In this case, the Sustainability Office, Group Internal Control, and Enterprise Risk & Compliance (Internal Governance functions) are some of the most relevant second line roles. In addition to the previous, the sustainability assurance provider provides an independent assessment of the company's sustainability processes and practices and verifies that the company complies with applicable sustainability regulations and standards.

²¹ It is important to mention that Amadeus has internal principles that guide the production and reporting of financial and sustainability information. In particular, the Policy regarding communication of economic, financial, non-financial and corporate information and regarding communication and contact with shareholders, institutional investors, and proxy advisors is based on, among other principles:

- Responsibility, diligence and transparency in the provision of information.
- Equal treatment and protection of the legitimate rights and interests of the market in general.
- Suitability and proportionality of the information to the stakeholders' needs and interests.
- The economic, financial, sustainability, and corporate information must be clear, objective, understandable, and simultaneous, and may not give rise to ambiguity or misunderstandings.
- The information will be presented in a concise, rational and organized manner.

information, etc). This process provides transparency and traceability of the information and the standardization of terms, metrics, formulas, and key indicators.

The Enterprise Risk Unit oversees and facilitates the implementation of effective risk management practices, including enterprise level sustainability-related risks. These are then consolidated into the Enterprise Risk Model (see section above). The results of the annual Corporate Risk Map are used in the double materiality assessment (financial materiality) by the Sustainability Office (see section *IRO-1- Description of the process to identify and assess material impacts, risks and opportunities* for further details).

Additionally, supporting the Sustainability Office in this role, the Sustainability Financial Compliance team and Group Internal Control, both under the responsibility of the Chief Financial Officer, also contribute to comply with sustainability reporting requirements. Beside monitoring, maintaining, and updating the ICSR control model matrix by the Internal Control Unit (see paragraphs above), the Sustainability Financial Compliance safeguards compliance in the financial information disclosure, the alignment with the financial statements, and the reliable calculation and estimation of the financial implications of sustainability matters that could impact on the annual accounts and the Non-Financial Information Statement and sustainability information 2024.

Functional unit managers and related employees facilitate the required information to the Sustainability Office to comply with sustainability reporting requirements. To do so, IT platforms and/or databases are used to collect qualitative and quantitative information and calculate the metrics to report. In this regard, Amadeus has started to incorporate measures to improve the consistency and quality of the information and to reduce errors and manual processes.

Lastly, an essential activity in preparing the Non-Financial Information Statement and sustainability information is the analysis, monitoring, update and regular review of the policies and guidelines that are relevant and applicable Group-wide. This role is assigned to the Sustainability Office, as well. In relation to this, Amadeus continuously tracks the regulatory landscape to make sure the company has the necessary policies and guidelines in place for compliance.

[Periodic reporting of the findings to the administrative, management and supervisory bodies](#)

Amadeus has established similar governance framework for financial and sustainability reporting. This way, Amadeus governance bodies periodically receive information about progress in sustainability reporting matters.

- As part of its functions and to achieve the objectives of the Board, the Audit Committee receives and reviews the financial and non-financial information that the Group delivers to markets and regulatory bodies. The Audit Committee oversees the process of preparing the reporting information related to sustainability matters; it reviews compliance with the legal and regulatory requirements applicable to the Company, the adequacy of the consolidation perimeter, and the correct application of accounting policies.
- The Audit Committee is regularly informed by the Group Internal Auditor and other internal stakeholders²² of the most relevant weaknesses detected during the course of their work, the remediation plans, and actions already undertaken.
- The Group Internal Audit, which reports functionally to the Audit Committee and administratively (i.e., day-to-day operations) to the Secretary of the Board of Directors, also monitors the effectiveness of the Group's internal control and risk management systems in relation to sustainability disclosure. The Group Internal Audit's plan for the assessment of the

²² See sections *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, *ESRS 2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies* for more detail.

ICSR effectiveness is submitted to the Audit Committee for approval before execution in order to ensure that it includes the Committee's considerations in this respect²³.

- In addition, the sustainability assurance provider communicates to the Audit Committee the conclusions resulting from their verification procedures. Additionally, the sustainability assurance provider is granted regular contact with the Audit Committee to share, discuss, or report on those aspects they consider necessary or relevant.
- Finally, the ESG Steering Committee oversees the principal functions of the Sustainability Office and the progress of the Sustainability strategy, to safeguard Amadeus compliance with stakeholders' expectations, including regulatory requirements, like those related to sustainability information. This Committee acts as a delegated advisory and decision-making body of the Amadeus Executive Committee (see more details in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*).

Strategy

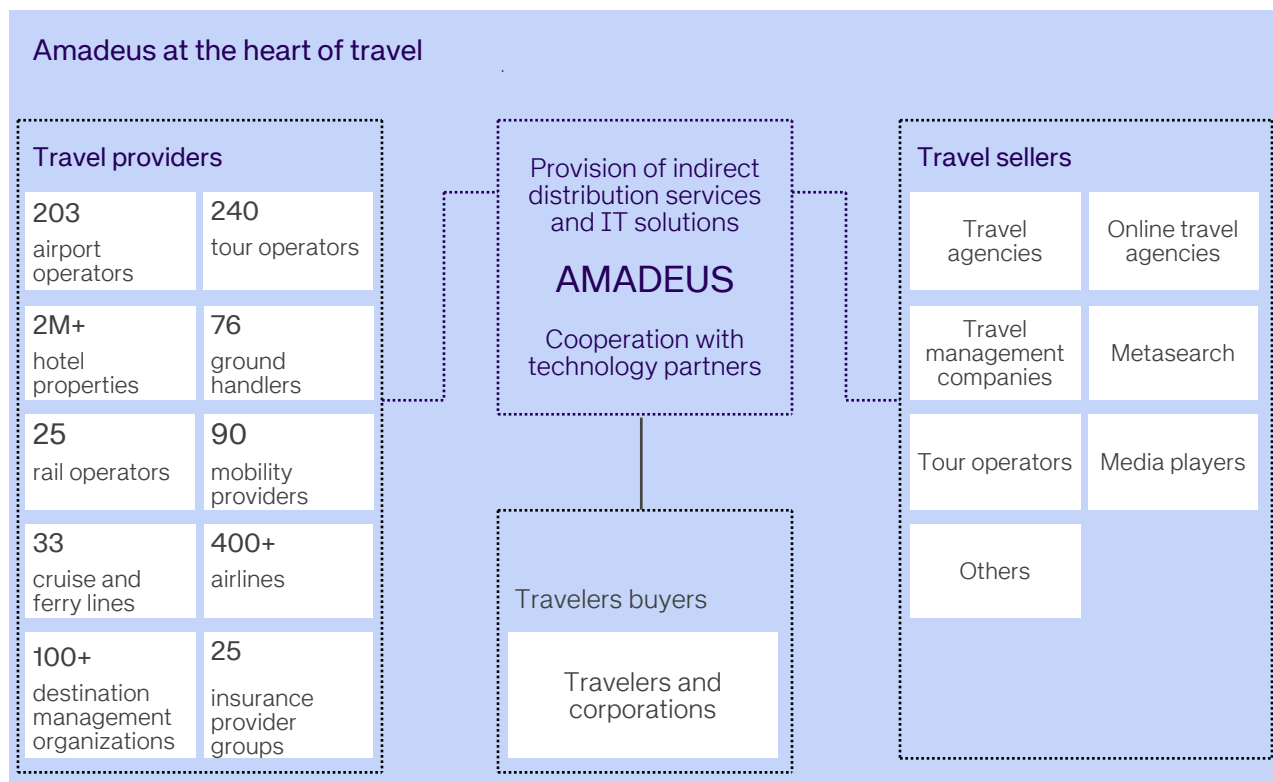
ESRS 2 SBM-1- Strategy, business model and value chain

Amadeus' products and services, business model and value chain

Amadeus is a technology company dedicated to the travel industry. The Group mainly operates in the sector Information technology (IT). The company provides technology solutions and services for the travel industry: airlines, airports, ground handlers, car rental agencies, corporations, cruise and ferry operators, hotels and event venues, insurance providers, travel sellers, tourism boards, travelers themselves and more. Through its operations in more than 190 countries, Amadeus facilitates complex transactions between travel providers and travel sellers and provides mission critical IT solutions for travel providers.

Amadeus' business model creates value by being at the heart of the travel and helping to deliver great traveler experiences with more information, choices and autonomy. Amadeus' purpose is to make the travel experience better for everyone, everywhere by inspiring innovation, partnerships and responsibility to people, places and planet. Through technology, Amadeus powers the global travel and tourism industry, inspiring more open ways of working and more connected ways of thinking, always with an eye on how the industry can evolve, how the customers can better serve travelers and how the company contributes to society and the environment. Hence, sustainability is key to the Company.

²³ For the first-year assessment, the scope was submitted to the Audit Committee in July 2024, and the outcome is expected to be delivered in February 2025.



There are three principal characteristics of Amadeus' business that serve as fundamental inputs to the value creation of the company. Firstly, the company operates a truly global business in which the geographical reach is a critical element of its value proposition, since Amadeus helps travel providers reach customers around the world even if they don't operate in some regions. Secondly, its healthy financial position and the long-established relations in the industry helps Amadeus to embark in significant R&D investments that translate into outputs that provide the industry with cutting-edge technology solutions that improve the operational and sustainability performance of the industry by making travel more efficient. Finally, its talented, experienced and diverse workforce help to focus on critical areas, making particularly Amadeus development efforts successful. In order to deliver advanced technology solutions that make the industry more efficient, the company also counts on external resources and providers, fundamentally hardware providers and consultancy work that contribute to maintaining the global reach and facilitate operations globally.

Amadeus operates several complementary business lines with significant commercial and technological synergies. Through them, the Company offers cutting-edge technology solutions that help key players in the travel industry succeed.

- **Air Distribution**

Amadeus' Air Distribution comprises travel customers where the primary offering is Amadeus GDS platform. It generates revenues mainly from booking fees that the Group charges to travel providers for bookings made, as well as other non-booking revenues but excluding Hotel and Car providers. Through the Air Distribution business area, the Group acts as a global network providing comprehensive real-time search, pricing, booking, ticketing and other processing solutions to travel providers and travel agency customers.

Amadeus offers a full range of commercial services and complementary technologies that:

- Connect sellers, buyers and partners across the global travel industry and beyond.
- Create opportunities to increase revenue by maximizing existing and new sales channels.

- Provide economies of scale and unparalleled efficiency in delivering high-yield travel reservations.
- Air IT Solutions

Air IT Solutions, also focused on travel customers including results from both, Airline IT and Airport IT businesses. The Group offers a portfolio of technology solutions (primarily Altéa Passenger Service System (PSS) and New Skies) that automate mission-critical processes for travel providers. This segment generates revenues from the transactions processed in the Amadeus platform, as well as from other IT services.

- Airline IT

Amadeus helps airlines—whether they’re full-service, hybrid, or low-cost—deliver on their business objectives. Amadeus solutions help airlines become more profitable, operate more efficiently, and provide differentiated experiences for their travelers. Amadeus supports airlines so they can provide travelers with a consistent, personalized customer experience throughout every stage of the journey. Amadeus offers airlines integrated PSS, standalone software, analytics and consulting solutions that:

- Grow revenues by helping travel business reach more potential customers more profitably through direct sales and merchandising.
- Optimize costs by streamlining marketing, sales and business operations.
- Increase customer loyalty with better brand differentiation and data-driven personalization.
- Airport IT

Amadeus’ proposition for the airport industry is targeted at helping airports to swiftly adapt operations, costs and commercial models. Amadeus removes the constraints of legacy solutions and provides the flexibility of modern cloud technology. Amadeus also offers solutions for passenger services and core airport operations, both made stronger with seamless data exchange.

- Hospitality & Other Solutions

Hospitality & Other Solutions, mainly focused on hospitality customers including, both the distribution and IT solutions services, and composed of hotel and payments distribution, hotel and payment IT solutions, mobility, insurance and ferry and travel advertising.

In addition to the above mentioned Amadeus’ business lines, Amadeus’ technical teams drive product innovation with R&D initiatives. They also provide customer support to safeguard data security and system stability. Finally, Amadeus’ corporate units help implement and evolve Amadeus’ corporate strategy.

Upstream

Some of the principal suppliers comprising Amadeus’ supply chain (upstream) by spend fall under the following categories:

- Consulting and marketing services.
- Hardware vendors.
- Software vendors.
- Data cloud providers.

From a supply chain perspective, the Amadeus principal activity is related to online transaction processing and technology development.

The majority of spend is concentrated on a limited number of vendors, mainly hardware producers (servers) and consultancy companies. With 50 key vendors accounting for more than 64% of global spend, Amadeus has a fairly stable situation in terms of vendor concentration.

Downstream

As a Business-to-Business (B2B) company, Amadeus' downstream refers mainly to the services provided to travel related companies worldwide. Hence, Amadeus has built commercial relationships with stakeholders across the travel industry globally, including airlines, travel agencies, hotels and airports, among others²⁴.

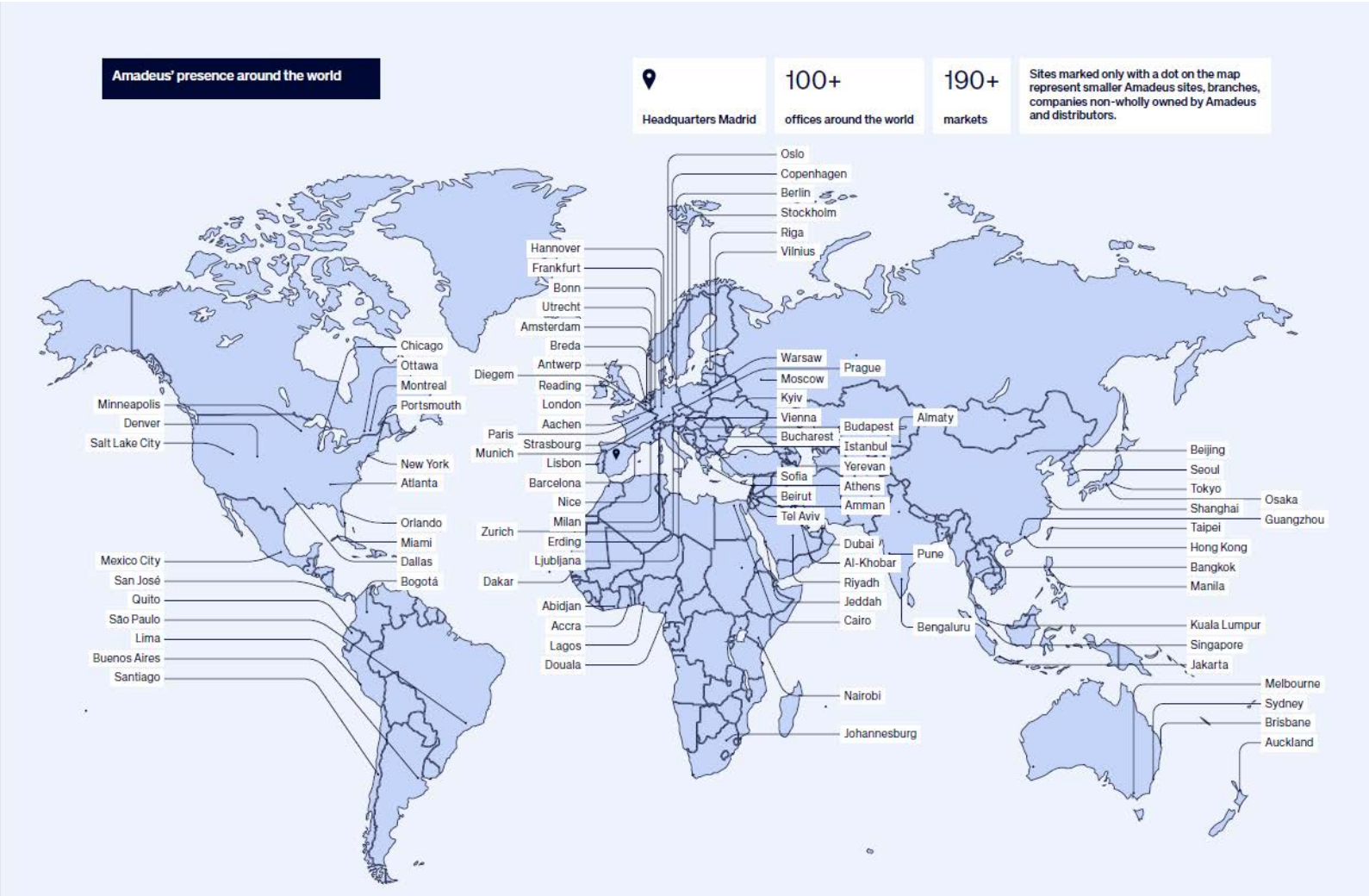
Amadeus' customers include providers of travel products and services, such as airlines (network, domestic, low-cost and charter carriers), airports, hotels (independent properties and big chains), tour operators (mainstream, specialist and vertically integrated players), insurance companies, land and sea transport companies (car rental companies, railway companies, cruise lines and ferry lines), travel sellers and brokers (offline and online travel agencies) and travel buyers (corporations and individual travelers). Customers are in more than 190 countries around the world.

Additionally, Amadeus invests in companies to expand its global network, industry know-how and technology. The aim is to encourage and nurture innovation applicable to the travel industry.

²⁴ Amadeus is a B2B company. It serves business customers, not end-users or consumers as it could be considered by the definition provided in ANNEX to the Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards and the Question ID 1026 – Definition of end users, included in Compilation of Technical Explanations (EFRAG). These documents are available at:

- https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302772
- <https://www.efrag.org/sites/default/files/media/document/2024-12/Explanations%20January%20-%20November%202024.pdf>

Amadeus presence around the world



Headcount of employees by geographical areas

As of December 31, 2024, Amadeus total workforce in terms of headcount was 20,643, that is 2,013 more than previous year. This workforce is spread across 100+ offices around the globe.

Headcount of employees by geographical areas as of December, 2024¹

	2024	2023
France	4,580	4,404
India	4,145	3,501
United States	2,206	2,241
Spain	1,941	1,630
Germany	1,219	1,251
Philippines	788	717
United Kingdom	691	620
Colombia	552	398
Turkey	479	387
Australia	430	419
Portugal	404	19
Bulgaria	327	324
Thailand	305	306
Costa Rica	253	233
Poland	247	239
Singapore	227	242
United Arab Emirates	192	152
Other geographies	1,657	1,547
Total	20,643	18,630

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcount as of the end of the reporting period.

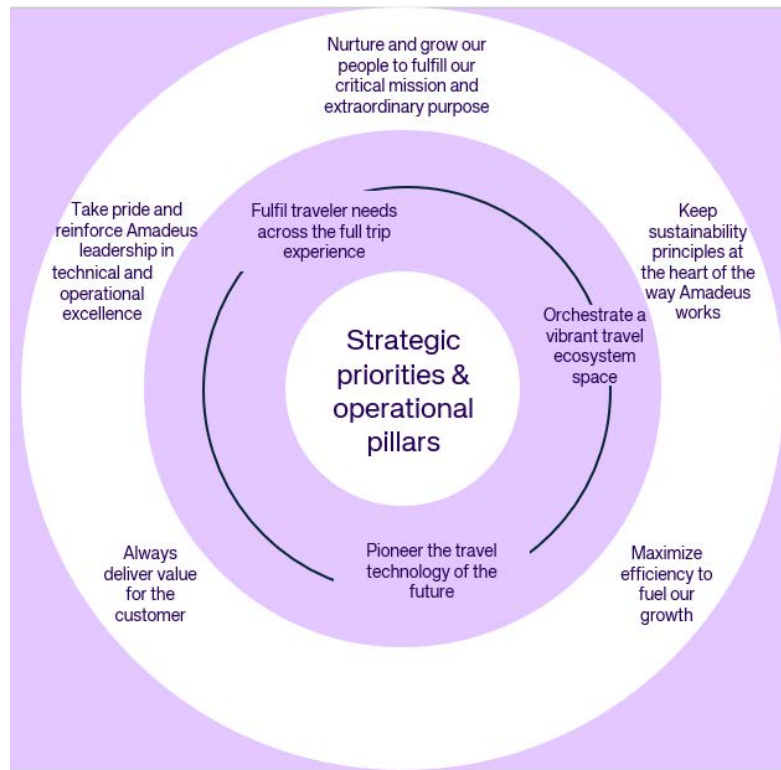
Breakdown revenues

According to the Compilation of Explanations related to ESRS provided by the EFRAG, as the European Commission has not adopted a delegated act specifying the list of ESRS sectors, Amadeus is not required to disclose the information referred to in ESRS 2 paragraph 40 (b)²⁵.

Sustainability-related goals

Amadeus' strategy is defined by a set of strategic priorities/pillars for the company and guided by its material topics and values. To promote the success of this strategy, operating pillars have been defined as enablers for the strategy to be executed.

²⁵ See question ID 39 – SBM-1 sector breakdown and phase-in in the document published by the EFRAG: <https://www.efrag.org/sites/default/files/media/document/2024-07/Compilation%20Explanations%20January%20-%20July%202024.pdf>



In order to effectively integrate sustainability across the business units and corporate functions, in 2023 Amadeus approved its renewed sustainability strategy, the “ESG ambition”. The strategy is structured around four areas of commitments:

- Environment – foster environmental sustainability: improving the environmental efficiency of the business, developing, and investing in technologies to help travelers make more sustainable decisions and travel providers to better manage their environmental impact, as well as working with key industry stakeholders on joint sustainability projects.
- Social (External) – drive social impact: foster social responsibility and maximizing the positive impact that travel can bring to society through a focus on promoting the inclusive and sustainable development of communities, fostering inclusive travel, boosting digitalization and purpose-driven innovation within the industry.
- Social (Internal) - empower talent journeys: fostering a purposeful, inclusive, and engaging culture in which Amadeus’ employees can become their best selves at work. The company seeks to create a caring environment, offer development opportunities for everyone, and attract the talented people from different backgrounds.
- Governance - be a reference for trust and integrity: embracing the highest standards of ethics, integrity and respect within Amadeus and across the value chain. The company does this by protecting customers’ data, upholding the best governance, security and quality practices and reporting transparently to Amadeus’ stakeholders.

To achieve the sustainability commitments, the company is aware of the importance of collaborating with others. In this way, Amadeus actively engages in three circles of influence:

- Ourselves, transforming the business to meet sustainability practices.

- Stakeholders, supporting its direct customers and their customers to achieve their sustainability goals.
- Industry partners, leveraging collective expertise to address global sustainability challenges.

Amadeus addresses these three areas for each of the four commitments, leading to 12 strategic lines. Finally, in each strategic line, one or several long-term goals are pursued:

- Each goal is tracked through one or several targets. To define them, a bottom-up approach was followed, involving Amadeus business units. Particularly, internal responsible experts at corporate level who had deep knowledge of affected stakeholders and the context in which the company operates, participated in the process. Additionally, when applicable, benchmarks have been carried out to take into consideration best practices.

Goals are monitored by the ESG Steering Committee which meets at least quarterly, being the Executive Committee the final authority on decisions. The Board of Directors monitors and discusses the progress on sustainability matters at least once a year, through information updates (see *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies* for further details).

- Additionally, each goal is achieved through a set of actions. To assess their effectiveness, the actions are periodically tracked between the Sustainability Office and the related business units involved. Additionally, an update is presented to the ESG Steering Committee, when applicable.

Targets are worked on and actions are executed by Amadeus employees²⁶.

²⁶ Targets and actions are described in the corresponding sections of this Non Financial Information Statement and sustainability information 2024 to facilitate its comprehension and the traceability of the information.

ESG Ambition

Commitment	Strategic lines	Goals	Stakeholders	Geographical areas
Foster environmental sustainability	Responsible operations	- Achieve emissions reductions in line with science-based targets. - Build and operate energy-efficient technology platforms and applications. - Guarantee continuous improvement in the use of resources.	Employees 	
	Environmental solutions enablers	- Develop and promote solutions to raise awareness and encourage travelers to choose more sustainable travel options. - Develop and promote IT solutions to help travel providers reduce their environmental impact.	Customers 	
	Network collaboration	Promote sustainable travel with travel industry stakeholders and gain influence, reputation, and network.	Industry associations, alliances, and partnerships 	
Drive social impact	Supportive neighbors	Help our communities thrive by leveraging our technology and travel expertise.	Society and environment 	
	Inclusive travel technology	- Ensure inclusive access to our products and services. - Develop solutions to enable and promote inclusive and conscious travel customers.		
	Inclusive ecosystem	- Foster an inclusive Travel & Tourism industry. - Promote a purpose-driven innovation ecosystem through collaboration.		
Empower talent journeys	Engaging culture for all journeys	- Embed ESG at the core of Amadeus' culture. - Provide a flexible, healthy and inclusive employee experience, ensuring fair treatment, rewards and benefits.	Employees 	
	Best selves at work	- Offer development opportunities for employees. - Advance Amadeus' diversity representation at all levels and professions.		
	Talent magnet	- Be positioned as an employer of choice for prospective candidates. - Guarantee unbiased and inclusive talent acquisition practices.		
Be a reference of trust and integrity	Robust governance	- Embed integrity, transparency, and diversity in our governance commitments. - Exercise accountability and risk management across our workforce, partners, and supply chain.	Employees 	
	Quality and security	- Maintain the highest security and data privacy standards to protect our operations, customers, and travelers. - Maintain continuous quality delivery of products and services and customer satisfaction.	Customers 	
			Industry associations, alliances, and partnerships 	
	Trusted advisors	- Be a trusted advisor to guide public and private stakeholders in digitalization and transport and tourism policies. - Promote more transparent and competitive markets through policy frameworks, association, and strong institutional relations. - Maximize ESG reporting transparency and alignment with regulatory frameworks.	Governments, authorities, and regulatory bodies  Suppliers	

As per the ESG ambition, sustainability needs to be integrated in Amadeus' solutions. To this end, the ESG Ambition includes two strategic lines and four goals focused on the development of sustainable solutions (see Figure above). The objective is the development of IT solutions that help customers improve their environmental efficiency, that are accessible and enable a more inclusive and sustainable travel. Amadeus' solutions cover all customer journey phases from Inspiration to Booking, Pre-trip, On-trip and Post-trip (see table below for further details).

Technology developments

Inspiration

- Amadeus Cytric
- Sky Suite
- Travel impact suite data hub and explorer
- Hotel and mobility distribution

In this phase of the customer journey, the Travel Impact Suite provide information on estimated CO₂ emissions per passenger flight, hotel room, car rental, rail trip included in most Amadeus' distribution platforms and available through APIs. Other solutions like Sky Suite, using advanced algorithms that estimate demand and analyze the risk of disruptions, helps airlines make fundamental decisions related to airline networks, flight frequencies and equipment, reducing the use of resources (fuel, aircraft, airport infrastructure, etc.) per passenger flown.

Booking

- Amadeus Cytric
- Delphi
- Hotel and mobility distribution
- HotSOS

During the booking phase, most Amadeus solutions offer the possibility of obtaining CO₂ emission estimations for different itineraries. Travelers can then incorporate CO₂ emissions as an additional element into their booking decision-making process, together with traditional parameters like schedules, availability and fares.

Pre-trip

- Amadeus Sequence Manager
- Airport cloud use service
- Sky suite
- Altéa departure control flight management
- Amadeus Cytric
- Volantio

With its existing IT solutions, Amadeus can drive further efficiency hence reduce CO₂ emissions: Amadeus Sequence Manager helps airports reduce waiting times at the runway by optimizing aircraft start-up times. Congestion and holding times are reduced. This minimizes fuel consumption by reducing time spent idling with engines on, thus reducing CO₂ emissions. And with Amadeus Airport Cloud Use Service, airports, airlines and ground handlers can reduce energy consumption by moving IT operations to the cloud. Amadeus' partner Volantio enables airlines to increase aircraft load factors, better matching demand to an airline's existing flight capacity by moving passengers from peak flights to less in-demand off-peak ones. Volantio helps to reduce the number of empty seats, optimizing the average net carbon emission for each passenger flown.

On-trip

- Delphi
- Airport cloud use service
- Amadeus Cytric
- Altéa departure control flight management
- HotSOS
- Flight operations controller
- Self-service check in kiosk and bag drop

As an example, Amadeus Altéa Departure Control – Flight Management automates for airlines the calculation of fuel (Zero Fuel Weight – or ZFW) and the optimal load distribution. It reduces fuel consumption through accurate load control and optimized flight balance. While Flight operations controller helps airlines manage operational disruptions by optimizing decision-making processes during unexpected events, such as delays or cancellations. Self-service check-in kiosk and bag drop are designed to work for both standing and wheelchair user passengers, providing airports with biometric identity verification solutions to streamline passenger identification, improve security, and enhance the efficiency of passenger flow.

Post-trip

- Agency Manager
- Amadeus Cytric
- HotSOS
- Amadeus Cytric
- Agency insights productivity tracker
- Airport cloud use service
- Delphi
- Media solutions

There's increased demand from corporations for solutions that help measure travel-related emissions. Some of Amadeus' solutions, like the corporate booking tool Cytric, make it possible to obtain post-trip CO₂ emissions reports aggregated by various criteria like geography, department or time. In Hospitality, Delphi solution optimizes sales, catering, and event management. With accurate documentation of guest preferences and real-time updates to catering plans hotels can minimize overproduction, reducing waste and operational inefficiencies. HotSOS provides hotels with comprehensive service optimization solutions. It empowers hotels to schedule preventative maintenance tasks, extending equipment lifespan, minimizing waste, and optimizing operational efficiency.

ESRS 2 SBM-2- Interests and views of stakeholders

Amadeus maintains dialogue with its stakeholders on a regular basis depending on need and the type of stakeholder, at least once a year. Additionally, Amadeus' stakeholders have easy access to up-to-date information about the company through different communication channels.

In order to identify material sustainability matters, Amadeus considered the opinion of different stakeholders using both directly and indirectly mechanisms (see section *ESRS 2 IRO-1- Description of the process to identify and assess material impacts, risks and opportunities*).

Additionally, as indicated previously, to define the ESG Ambition, Amadeus internal responsible experts at corporate level who had deep knowledge of affected stakeholders and the context in which the company operates, participated in the process. This is how the views of stakeholders have been considered in the definition of the sustainability strategy.

			Stakeholder engagement
Stakeholder	Communication channels	Engagement purpose	Outcomes
Employees and external candidates 	- Direct engagement through local, regional and global Amadeus People & Culture teams. - Engagement surveys - Collective bargaining agreements. - Intranet and internal weekly communications. - Participation in external events to showcase its expertise and attract new talent, covered by Amadeus social media channels. https://jobs.amadeus.com/ - Speak Up Channel https://amadeus.com/en/speak-up-channel	- Contribute to a sustainable workplace and working life. - Attract, grow and engage talented people. - Have a productive, stimulating career, on equal terms. - Look out for employees feel valued. - Promote diversity and inclusion.	- Inclusion of views and perspectives of employees in Amadeus' actions. - Improvement of health and well-being measures. - Culture of business integrity. - Increased interest in sustainability topics. - Culture of belonging and fair treatment, attracting candidates and employees from different backgrounds.
Shareholders, investors, ESG ratings 	- Direct engagement through Investor Relations team and periodic reports. - Annual General Meeting. - Roadshows and conferences. - Investor Relations Inbox. - Website for investors (https://corporate.amadeus.com/) - Financial and non-financial information (reports, etc). - ESG rating.	- Promote two-way communication, inform about the Amadeus' financial and non-financial performance. - Have knowledge of the main areas of investors' interests, to incorporate improvements in the performance. - Understand financial and ESG expectations.	- Financial and ESG ratings - Satisfaction of information needs of financial stakeholders for financial and sustainability data. - Secured financing. - Response to investors interests.
Customers 	- Regular press releases. - Guest blog posts in which customers offer their view on the industry and Amadeus' collaboration. - Direct engagement through sales channels as well as customer management teams. - Voice of the Customer. Program (interviews, surveys). - Local and global customer support centers. - Customer-focused events.	- Monitors customers' experiences across different stages. - Transform feedback into actionable insights that teams across Amadeus will use to improve customer experiences. - Build confidence and trust. - Provide sustainable solutions.	- Stronger alignment with customers values. - Improvement of products/ services, according to the customers' needs and expectation, specially those sustainability-related.
Suppliers and vendors 	- Direct contact through the Amadeus Corporate Purchasing department as well as internal units and local teams across offices worldwide. - Amadeus Vendor Portal. - ESG questionnaire. - Speak Up Channel https://amadeus.com/en/speak-up-channel	- Identify candidates for strategic relationships, facilitates communication with potential vendors and ensures new suppliers meet firm-wide quality, management and safety standards. - Comply with Amadeus' principles. - Protect human and labor rights of workers and decarbonizing its activity chain.	- Improvement of supplier standards, including ESG. - Increased awareness in the industry about the importance of sustainability and identify potential risks and areas for improvement. - Streamlined supplier expectations.

Stakeholder engagement

Stakeholder	Communication channels	Engagement purpose	Outcomes
Industry associations, alliances, and partnerships 	• Direct engagement through participation in main industry associations. • Blog posts, bylines and other media engagements through which Amadeus offers its views on trending industry matters.	• Have knowledge of market practices and trends. • Increase Amadeus visibility and reputation. • Promote fair competition and transparency in the travel distribution market.	• Alliance creation to ensure shared value. • Improvement of industry sustainability performance, including areas such as climate change. • Improvement of industry standards.
Governments, authorities and regulatory bodies 	• Direct contact. • Participation in related meetings, events and initiatives. • Industry and Government Affairs Box email.	• Get updates from regulators and other relevant public authorities. • Provide expert feedback on travel and technology matters.	• Regulatory compliance to ensure Amadeus operates within legal frameworks across all markets. • Value creation and risk mitigation from compliance. • Enhancement of the efficiency of regulation of the industry.
Society and environment 	• Direct engagement through multi-stakeholder panels. • Collaboration on joint social responsibility and sustainability initiatives. • Social media and Blog posts showcasing its engagement in local communities. • https://corporate.amadeus.com/en/sustainability	• Increase the positive impact of travel and tourism on society by enabling a more inclusive industry. • Play an active role in social networks. • Address the environmental efficiency of the operations. • Promoting a purpose-driven innovation ecosystem. • Addressing community concerns.	• Empowered local communities and create positive impacts in the society in which the Group's operates. • Support communities' needs. • Reduce the Amadeus environmental footprint/ impact. • Contribute to a more sustainable travel industry.

As mentioned in section *ESRS 2 GOV-4 – Statement on due diligence*, at the end of 2024 a project kicked off to map Amadeus stakeholders and communication channels with the aim of defining a communication framework and improving its stakeholder engagement. Amadeus aims to maintain and even strengthen the relationship with its stakeholders.

The Board of Directors, through the Audit Committee, regularly receives information from employees and other stakeholders, as part as the Speak Up channel procedure and communication. Furthermore, as part as the Non-Financial Information Statement and sustainability information 2024 formulation by the Board and its supervision by the Audit committee, the company's governance bodies receive information on the interests and opinions of key stakeholders and Amadeus' IROs.

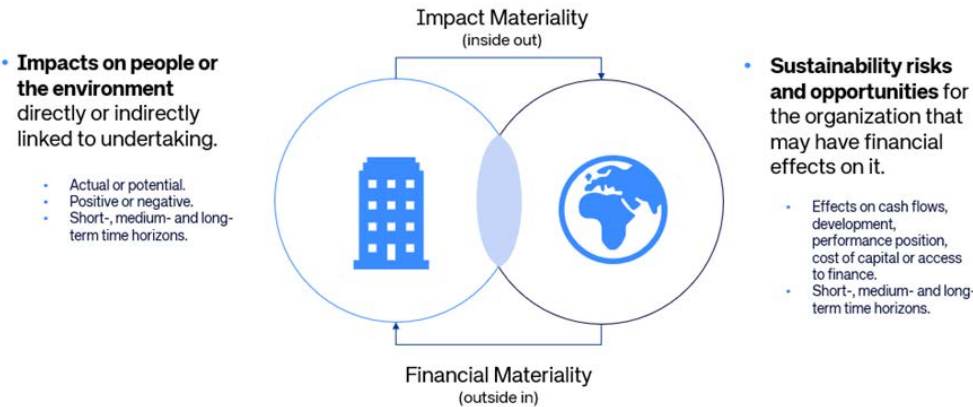
Impacts, risks and opportunities management

ESRS 2 IRO-1- Description of the processes to identify and assess material impacts, risks and opportunities

In 2024 Amadeus updated its materiality assessment following the principles of double materiality in line with the requirements of the ESRS 1 and ESRS 2, and the steps set out by the EFRAG in the *Materiality assessment Implementation Guidance - IG* ²⁷.

This approach allows the Group to identify material sustainability matters, considering two dimensions: impact materiality and financial materiality. Both are inter-related and their interdependencies have been considered.

²⁷ Available at https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/IG%201%20Materiality%20Assessment_final.pdf



A sustainability matter may be material from a financial or impact perspective or both.

The scope of the Amadeus double materiality includes sustainability actual or potential impacts, risks and opportunities connected to Amadeus’ own operations and upstream and downstream value chain, including through its products and services as well as through its business relationships.

The analysis has been developed in the following phases:

	Understanding the context	• Activities, business relationships and geographies. • Value chain, upstream and downstream. • Affected stakeholders. • Other contextual information.
	Identification of the Impacts, Risks, Opportunities	• Reference to the list of topics, sub-topic and sub-sub-topics as established in the ESRS 1 (AR 17). • Impacts: aligned to due diligence process. • Risk and opportunities: considering Corporate Risk Catalogue and the ESG Ambition.
	Assessment and determination of the material IROs	• Impact materiality: assessment considering the scale, scope, irremediable character and likelihood • Risk and opportunities: following the Risk Management Framework and methodology, and the Corporate Risk Map. • The input of ESG analysts has been also considered.
	Reporting	• On the process. • On the outcome.

Understanding the context

This first phase aims to understand Amadeus’ business model, activities, value chain and main stakeholders, as explained in sections *ESRS 2 SBM-1- Strategy, business model and value chain* and *ESRS 2 SBM-2- Interests and views of stakeholders*. To this end, various sources of information have been analyzed, both internal and public documents.

- An analysis of Amadeus’ sites and geographies, as well of the subsidiaries' activities has also been carried out to understand the full reach of Amadeus operations and the whole value chain.
- Amadeus ’s main stakeholders classification has been reviewed, as well as communication channels.

- Regarding its upstream value chain, the company has assessed its suppliers, analyzing its industries and identifying critical sustainability-related topics and geographies.
- Additionally, a review of the downstream value chain has been conducted identifying relevant products and investments.
- Finally, other contextual information has been analyzed, such as the relevant regulatory landscape affecting the company, as well as sector-specific benchmarks, among others.

Identification of actual and potential IROs²⁸

For the identification of IROs, the aforementioned references have been taken as a starting point. Following this, the list of topics, subtopics and sub-subtopics defined in ESRS 1²⁹ have been considered to predefine a list of actual and potential impacts, risks and opportunities, analyzing each one of the subtopics covered by the ESRS. Additionally, some entity-specific topics and subtopics have been identified.

- Regarding impact materiality, Amadeus' human rights and environmental due diligence procedure has been taken as a starting point, considering both sustainability impacts raised from Amadeus own operations and its value chain.

Additionally, to focus on critical factors that could imply critical adverse impacts, Amadeus has assessed the different business activities, and the geographies in which the Group operates³⁰. Also, the upstream and downstream value chain have been analyzed as a continuation of the analysis carried out in the previous phase (see paragraphs above, *Understanding the context*).

Finally, stakeholders opinions have also been considered to support impacts identification³¹.

- For financial materiality, Amadeus has taken into account its Corporate Risk Catalogue, identifying ESG-related risks emerging from its own operations and its value chain³². To identify opportunities, the ESG Ambition has been considered. Additionally, external independent sources have been analyzed, such as ESG analysts, investors or sustainability reporting standards³³. Connections of the impacts and dependencies with the risks and opportunities that may arise from them have been considered as well.

Assessment and determination of the material IROs

In this phase, the IROs identified in the previous step have been assessed, taking into account the following:

- Actual or potential impacts³⁴ have been assessed considering the following factors:
 - Scale: How grave the impact is for people or the environment.
 - Scope: How widespread is the impact.
 - Irremediable character (only for negative potential and actual impacts): Whether the negative impacts can be remediated.
 - Likelihood (only for potential impacts): Possibility for an impact to materialize, in the short, medium or long term.

²⁸ For further details about the process, particularly the approach followed to identify climate-related risks, including the use of scenarios, please refer to section ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities.

²⁹ Appendix A: Requirements for application of ESRS 1 - General Requirements, specifically in AR 16.

³⁰ In this sense, Amadeus has assumed activities related to IT services do not generate different impacts depending on the geography in which they are developed.

³¹ Amadeus' work climate surveys and Amadeus' downstream survey.

³² The Amadeus Corporate Risk Map incorporates ESG risks.

³³ The Enterprise Risk function is involved both in the identification and evaluation process to look out for internal alignment.

³⁴ In the short, medium or long-term.

Amadeus has defined the related scales, ranging from minor to critical, considering internal procedures and external expert inputs to safeguard objectivity in the assessment process.

In relation to the assessment, a first evaluation was proposed by external consultants. After that, internal experts at corporate level validated the assessment³⁵. Finally, the established thresholds have been applied to differentiate material impacts³⁶.

- On the other hand, risks and opportunities in the short, medium or long term have been assessed following the Amadeus Risk Management Framework and methodology (see section *ESRS 2 GOV 5 - Risk management and internal controls over sustainability reporting*). To this end, the following have been considered:
 - Financial and non-financial effects, including reputational, operational and legal, if they may affect Amadeus' business.
 - Likelihood: Possibility for a risk or opportunity to materialize.

The latest version of the Corporate Risk Map has been taken into consideration to score the related ESG risks, according to the established scales³⁷. In addition to the above, the input of external stakeholders (ESG analysts/providers, proxy advisors) has been taken into account, integrating it into the evaluation.

In relation to the opportunities, since they are not included in the corporate risk map, a separate internal assessment has been carried out.

Amadeus has qualitatively analyzed the anticipated financial effects on financial position, financial performance, cash flows, access to finance or cost of capital of risks and opportunities.

Once assessed, the established thresholds—ranging from minor to critical—have been considered to determine material risks and opportunities based on the Corporate Risk Map methodology (see footnote 37).

Internal controls were applied throughout the process:

- The double materiality assessment is aligned with internal procedures (see *Identification of actual and potential IROs and Assessment and determination of the material IROs*). Specifically, the thresholds and time horizons used were based on Amadeus Corporate Risk Management Framework.
- Additionally, the method used for scoring is in accordance with ESRS requirements and the EFRAG guidelines.
- Finally, the process has been documented with a detailed description of the different steps, and the related evidences.

Both the process itself and the obtained results have been approved and/or endorsed by:

- The ESG steering Committee, which has gone through the entire process, including the approval of the final results.
- Members of the executive Committee who, when applicable, have reviewed and approved the final results.

³⁵ Internal responsible experts at corporate level who had deep knowledge of affected stakeholders and users of sustainability reports were designated as stakeholder representatives to score the IROs -each sustainability IROs was reviewed with the associated expert-. These experts receive inputs from the Amadeus sites, considering the specific situation and context in which they operate.

³⁶ High and critical impacts, risks and opportunities are considered material, following the Corporate Risk Map methodology. Particularly, Amadeus considers:

- Material impacts thresholds based on the estimated percentage of affected stakeholders and/or geographical perimeter from the location in which impacts occur, and how these impacts may affect to the quality of life of people and/or the functionality of ecosystem services,
- Material risks and opportunities based on the likelihood of occurring and their impacts.

³⁷ This also look our for that the sustainability-related risks has been aligned with the Amadeus Risk Management Framework and methodology.

- The Board of Directors, for endorsement.

Future steps

As previously indicated, in 2024 Amadeus has updated the materiality assessment to be aligned with the requirements of the ESRS 1 and ESRS 2, and the steps set out by the EFRAG in the *Materiality assessment Implementation Guidance*. Additionally, the value chain has been considered during the process.

The company aims to revisiting the double materiality process for identifying, assessing, and prioritizing IROs, taking into account evolving trends, underlying assumptions, context and regulatory changes, if applicable.

Additionally, the double materiality results will be considered, when applicable, while developing future action plans.

ESRS 2 IRO-2- Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

The table below *Context index - ESRS disclosure requirements and material data points that derive from other EU legislation* lists the ESRS disclosure requirements in ESRS 2 and the topical standards which are material to Amadeus and which have guided the preparation of this report. Throughout the document, disclosure requirements in the topical standards E2, E3, E4, E5, S2, S3 and S4 have been omitted as these are below the materiality thresholds.

Additionally, in relation to data points that derive from other EU legislation, as listed in ESRS 2 appendix B:

- Material data points have been included in the same table below *Context index - ESRS disclosure requirements and material data points that derive from other EU legislation*, indicating where the data points can be found in this report. The data points derived from other EU legislation which are not material, including those related to standards E2, E3, E4, E5, S2, S3, and S4, have also been included in the table, expressly indicating that they are not material (marked in gray color).

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
ESRS 2 - General disclosures								
ESRS 2 BP-1 General basis for preparation of the sustainability statement	Not applicable	1						
ESRS 2 BP-2 Disclosures in relation to specific circumstances	Not applicable	3						
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies	Not applicable	5	\$21 (d) Board's gender diversity	■		■		6
			\$21 (e) Percentage of board members who are independent			■		6
ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Not applicable	11						
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	Not applicable	12						
ESRS 2 GOV-4 Statement on sustainability due diligence	Not applicable	13	\$30 Statement on due diligence	■				14
ESRS 2 GOV-5 – Risk management and internal controls over sustainability reporting	Not applicable	15						
ESRS 2 SBM-1 Strategy, business model and value chain	Not applicable	20	\$40 (d) i Involvement in activities related to fossil fuel activities	■	■	■		Not applicable
			\$40 (d) ii Involvement in activities related to chemical production	■		■		Not applicable
			\$40 (d) iii Involvement in activities related to controversial weapons	■		■		Not applicable
			\$40 (d) iv Involvement in activities related to cultivation and production of tobacco			■		Not applicable
ESRS 2 SBM-2 Interest and views of stakeholders	Not applicable	30						
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Not applicable	44						
ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities	Not applicable	31						
ESRS 2 IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Not applicable	35						
ESRS E1 - Climate change								
ESRS 2 - GOV-3 - E1 - Integration of sustainability-related performance of incentive schemes	Material	64						

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					Page reference/ comments
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	
E1-1 Transition plan for climate change mitigation	Material	64	\$14 Transition plan to reach climate neutrality by 2050				■	65
			\$16 (g) Undertakings excluded from Paris-aligned Benchmarks		■	■		66
ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model	Material	66						
ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Material	70						
E1-2 Policies related to climate change mitigation and adaptation	Material	72						
E1-3 Actions and resources in relation to climate change policies	Material	74						
E1-4 Targets related to climate change mitigation and adaptation	Material	77	\$34 GHG emission reduction targets	■	■	■		77
E1-5 Energy consumption and mix	Material	79	\$38 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	■				Not applicable
			\$37 Energy consumption and mix	■				80
			\$40-\$43 Energy intensity associated with activities in high climate impact sectors	■				81
E1-6 Gross Scopes 1, 2, 3 and total GHG emissions	Material	81	\$44 Gross Scope 1, 2, 3 and Total GHG emissions	■	■	■		85
			\$53-\$55 Gross GHG emissions intensity	■	■	■		87
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	Material	87	\$56 GHG removals and carbon credits				■	87
E1-8 Internal carbon pricing	Material	88						
E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Material	Not disclosed - phase in	\$66 Exposure of the benchmark portfolio to climate-related physical risks			■		Not disclosed - phase in
			\$66 (a); \$66 (c) Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk		■			Not disclosed - phase in
			\$67 (c) Breakdown of the carrying value of its real estate assets by energy-efficiency classes		■			Not disclosed - phase in
			\$69 Degree of exposure of the portfolio to climate-related opportunities			■		Not disclosed - phase in

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
ESRS E2 - Pollution								
E2-4 Pollution of air, water and soil	Not material	NA	\$28 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	■				Not material
ESRS E3 - Water and marine resources								
E3-1 Policies related water and marine resources	Not material	NA	\$9 Water and marine resources	■				Not material
			\$13 Dedicated policy	■				Not material
			\$14 Sustainable oceans and seas	■				Not material
E3-4 Water and marine resources	Not material	NA	\$28 c Total water recycled and reused	■				Not material
			\$29 Total water consumption in m ³ per net revenue on own operations	■				Not material
ESRS E4 - Biodiversity and ecosystems								
ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Not material	NA	\$16 (a) i	■				Not material
			\$16 (b)	■				Not material
			\$16 (c)	■				Not material
E4-2 Policies related to biodiversity and ecosystems	Not material	NA	\$24 (b) Sustainable land / agriculture practices or policies	■				Not material
			\$24 (c) Sustainable oceans / seas practices or policies	■				Not material
			\$24 (d) Policies to address deforestation	■				Not material
ESRS E5 - Resource use and circular economy								
E5-5 Resource outflows	Not material	NA	\$37 (d) Non-recycled waste	■				Not material
			\$39 Hazardous waste and radioactive waste	■				Not material
ESRS S1 - Own workforce								

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
ESRS 2 SBM-2 – Interests and views of stakeholders	Material	30						
ESRS 2 SBM-3 - S1 - Material IROs and their interaction with strategy and business model	Material	89	ESRS 2- SBM3 - S1 §14 (f) Risk of incidents of forced labour	■				90
			ESRS 2- SBM3 - S1 §14 (g) Risk of incidents of child labour	■				90
S1-1 Policies related to own workforce	Material	92,101, 110,119	§20 Human rights policy commitments	■				93
			§21 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			■		94
			§22 Processes and measures for preventing trafficking in human beings	■				93
			§23 Workplace accident prevention policy or management system	■				102, 113
S1-2 Processes for engaging with own workers and workers' representatives about impacts	Material	91						
S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	Material	92	§32 (c) Grievance/complaints handling mechanisms	■				92
S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Material	95, 105, 113, 120						
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Material	97, 108, 115, 123						
S1-6 Characteristics of the undertaking's employees	Material	98						
S1-7 Characteristics of non-employee workers in the undertaking's own workforce	Material	100						
S1-8 Collective bargaining coverage and social dialogue	Material	100						
S1-9 Diversity metrics	Material	116						
S1-10 Adequate wages	Material	101						
S1-11 Social protection	Material	Not disclosed - phase in						
S1-12 Persons with disabilities	Material	116						
S1-13 Training and skills development metrics	Material	123						

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
S1-14 Health and safety metrics	Material	109	\$88 (b) and (c) Number of fatalities and number and rate of work-related accidents	■		■		109
			\$88 (e) Number of days lost to injuries, accidents, fatalities or illness	■				109
S1-15 Work-life balance metrics	Material	109						
S1-16 Remuneration metrics (pay gap and total compensation)	Material	117	\$97 (a) Unadjusted gender pay gap	■		■		117
			\$97 (b) Excessive CEO pay ratio	■				118
S1-17 Incidents, complaints and severe human rights impacts	Material	101	\$103 (a) Incidents of discrimination	■				101
			\$104 (a) Non-respect of UNGPs on Business and Human Rights and OECD	■		■		101
ESRS S2 - Workers in the value chain								
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Not material	NA	ESRS 2- SBM3 – S2 §11 (b) Significant risk of child labour or forced labour in the value chain	■				Not material
S2-1 Policies related to value chain workers	Not material	NA	§17 Human rights policy commitments	■				Not material
			§18 Policies related to value chain workers	■				Not material
			§19 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	■		■		Not material
			§19 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			■		Not material
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	Not material	NA	§36 Human rights issues and incidents connected to its upstream and downstream value chain	■				Not material
ESRS S3 - Affected communities								
S3-1 Policies related to affected communities	Not material	NA	§16 Human rights policy commitments	■				Not material
			§17 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OCDE guidelines	■		■		Not material

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
S3-4 - Taking action on material impacts on affected communities and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Not material	NA	\$36 Human rights issues and incidents	■				Not material
ESRS S4 - Consumers and end users								
S4-1 Policies related to consumers and end users	Not material	NA	\$16 Policies related to consumers and end-users	■				Not material
			\$17 Non-respect of UNGPs on Business and Human Rights and OCDE guidelines	■				Not material
S4-4 Taking action on material impacts on affected communities and approaches to managing material risks and pursuing material opportunities related to consumers and end users, and effectiveness of those actions	Not material	NA	\$35 Human rights issues and incidents	■				Not material
ESRS G1 - Business conduct								
ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies	Material	125						
ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	Material	127						
G1-1 Business conduct policies and corporate culture	Material	128	\$10 (b) United Nations Convention against Corruption	■				129 Amadeus has policies in force on anti-corruption and anti-bribery consistent with UN Conventions against corruption
			\$10 (d) Protection of whistle- blowers	■				131 Amadeus has policies in force on protection of whistle-blowers
G1-2 - Management of relationships with suppliers	Material	136						
G1-3 Prevention and detection of corruption and bribery	Material	140						
G1-4 Incidents of corruption or bribery	Material	143	\$24 (a) Fines for violation of anti-corruption and anti-bribery laws	■		■		143
			\$24 (b) Standards of anti- corruption and anti-bribery	■				143 Amadeus has not had to address any breaches of anti-corruption and anti-bribery in 2024.

Context index - ESRS disclosure requirements and material data points that derive from other EU legislation

Disclosure Requirement	Material/ Not material	Page reference	Data points derived from other EU legislation					
			Data point (paragraph)	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page reference/ comments
G1-5 Political influence and lobbying activities	Material	143						
G1-6 - Payment practices	Not material	NA						
Entity specific - Fair and transparency tax practice								
ESRS 2 - SBM-3 - G1 (Entity specific) - Material IROs - Fair and transparency tax practice	Material	149						
MDR-P Policies adopted to manage material sustainability matters-Fair and transparency tax practice	Material	149						
MDR-A Actions and resources in relation to material sustainability matters-Fair and transparency tax practice	Material	152						
MDR-M Metrics in relation to material sustainability matters - Fair and transparency tax practice	Material	154						
MDR-T Tracking effectiveness of policies and actions through targets - Fair and transparency tax practice	Material	157						
Entity specific - Cybersecurity								
ESRS 2 - SBM-3 - G1 (Entity specific) - Material IROs - Cybersecurity	Material	158						
MDR-P - Policies adopted to manage material sustainability matters - Cybersecurity	Material	158						
MDR-A - Actions and resources in relation to material sustainability matters - Cybersecurity	Material	160						
MDR-M - Metrics in relation to material sustainability matters - Cybersecurity	Material	161						
MDR-T - Tracking effectiveness of policies and actions through targets - Cybersecurity	Material	162						
Entity specific - Data privacy								
ESRS 2 - SBM-3 - G1 (Entity specific) - Material IROs - Data privacy	Material	163						
MDR-P - Policies adopted to manage material sustainability matters - Data privacy	Material	163						
MDR-A - Actions and resources in relation to material sustainability matters - Data privacy	Material	166						
MDR-M - Metrics in relation to material sustainability matters - Data privacy	Material	167						
MDR-T - Tracking effectiveness of policies and actions through targets - Data privacy	Material	168						

List of the Disclosure Requirements

A sustainability topic is considered material if at least one IRO is above the threshold, indicating either impact materiality, financial materiality, or both. During the double materiality process, 153 IROs were identified. Of those, 33 were deemed material:

- 86 impacts identified, of which 22 material.
- 67 risk and opportunities identified, 11 material.

The IROs have been consolidated and mapped to 3 material sustainability topics and 2 entity specifics³⁸, 9 sub-topics³⁹, and 8 sub-sub-topics.

Material topics and sub-topics

Topic		Sub-topic	Impact materiality	Financial materiality
ESRS E1	Climate Change	Climate change mitigation & Energy		
ESRS S1	Own workforce	Working conditions		
		Equal treatment and opportunities for all		
ESRS G1	Business conduct	Corporate culture, including protection of whistle-blowers		
		Political engagement and lobbying activities		
		Corruption and bribery, prevention		
		Intellectual property protection and competitive behavior		
		Management of relationships with suppliers		
	Tax (entity specific)			
	Cybersecurity and data privacy (entity specific)			

 Material

Hence, based on the materiality analysis performed, the following topics according to ESRS 1 - AR 16 are not material to Amadeus, therefore no information shall be reported.

- ESRS E2 Pollution
- ESRS E3 Water and marine resources
- ESRS E4 Biodiversity and ecosystems
- ESRS E5 Resource use and circular economy
- ESRS S2 Workers in the value chain

³⁸ For reporting purposes, the entity-specific sub-topics of cybersecurity and data privacy are reported separately to provide more comprehensive information.

³⁹ Note that climate change mitigation and energy have been combined into one single sub-topic as they are very related.

- ESRS S3 Affected communities
- ESRS S4 Consumers and end-users

To determine material ESRS topics, the related process has been followed, as described in the section before *ESRS 2 IRO -1 Description of the process to identify and assess material impacts, risks and opportunities*. Based on this identification and assessment process, ESRS may not be material for two reasons. The first one is because Amadeus is not connected, both for its own operations and its business relationships, with different ESRS topics (such as, for example, with marine resources), and then no impacts, risks and opportunities have been identified. The second reason is because impacts, risks and opportunities regarding different ESRS topics have been assessed, not exceeding the materiality thresholds.

In this regard, as previously indicated, high and critical impacts, risks and opportunities are considered material, following the Corporate Risk Map methodology. See further details in section *ESRS 2 IRO-1- Description of the processes to identify and assess material impacts, risks and opportunities*.

Based on the results obtained from this materiality analysis, Amadeus has assessed and determined the material information and data points to be reported. For this purpose, the recommendations provided by EFRAG and the IG3 implementation guide, regarding the list of ESRS data points, have been taken into consideration⁴⁰.

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

Information on Amadeus material impacts, risks and opportunities resulting from the materiality assessment is presented in the table below, including:

- The connection of the IROs with the related topic or subtopic, as defined in ESRS 1 - AR 16.
- A description of where these IROs are concentrated (either on own operations and/or on value chain).
- How the material negative and positive impacts, or sustainability related risks and opportunities may affect to people and/or environment or the Amadeus financial performance, when applicable.
- In case of potential impacts or sustainability-related opportunities, the reasonably expected time horizons.
- The connection of the IROs to the Amadeus strategy and, specifically, the sustainability strategy of Amadeus (ESG Ambition) (see sections *ESRS 2 GOV-1- The role of the administrative, management and supervisory bodies* and section *Sustainability-related goals* included in *ESRS 2 SBM-1-Strategy, business model and value chain* for additional information).
- The specific sections/references contained in this report in which the related disclosure requirements are provided, in relation to each material sustainability topic.

⁴⁰ See <https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/EFRAG%20IG%203%20List%20of%20ESRS%20Data%20Points%20-%20Explanatory%20Note.pdf>

Material impacts, risks and opportunities

Topic / Sub - topic / Entity specific	Scope/ Concentration	Time horizon	Description of the IROs and financial effects	Strategy and/or business model ¹	More references
ESRS - E1 Climate change - Climate change mitigation - Energy 	Own operations and value chain	Medium-term	Amadeus negatively impacts the environment by its direct and indirect GHG emissions, the latter accounting for the largest proportion. Disruptions to the energy supply can have a material effect on operations, depending on the magnitude and timing of the disruption. Finally, Amadeus participates and develops projects that lead to reductions in GHG emissions. Growing demand for climate change related products and services that help combat climate change is a business opportunity that may have financial effects in the Company.	Amadeus addresses these material impacts, risks and opportunities through the commitment "Foster environmental sustainability", the related lines of actions included in the ESG Ambition, and the Climate Transition Plan, among others.	Sections ESRS E1 - Climate change, and section Sustainability-related goals in SBM-1- Strategy, business model and value chain contain specific details.
ESRS - S1 Own workforce - Working conditions - Equal treatment and opportunities for all 	Own operations	Medium/long-term	Amadeus generates positive impacts in its own workforce by creating secure employment. The Company promotes beneficial working conditions for its employees, including adequate wages, the improvement of the employees' well-being and health, career development, and an inclusive and diverse work environment, among others. Amadeus is also making important efforts to help employees in combining work and private life, achieving work-life balance. Main risks and opportunities come from reinforcing a strong brand identity and talent attraction and diversity, that enables successful hiring of new employees, reducing turnover rates and increasing innovation processes, which in turn has a potential financial effect on the company (financial performance, cash flows, access to finance or cost of capital).	Amadeus addresses these material impacts, risks and opportunities through the People and Culture (P&C) Strategic pillars, the Employer Value Proposition, the Diversity, Equity and Inclusion (DEI) strategy, and the commitment "Empower Talent Journey" included in the ESG Ambition.	Sections ESRS S1 - Own workforce and section Sustainability-related goals in SBM-1- Strategy, business model and value chain contain specific details.
ESRS - G1 Business conduct - Corporate culture and protection of whistle-blowers - Political engagement and lobbying activities - Corruption and bribery - Intellectual property protection and competitive behavior - Management of relationships with suppliers 	Own operations and value chain	Medium/long-term	Responsible business practices are implemented in Amadeus. In this regard, the Amadeus key positive impacts raise from the implementation of compliance and ethics measures, and the protection and confidence generation in Amadeus stakeholders. Additionally, the company generates positive impact by reinforcing sustainable practices among suppliers through its purchasing policies and procedures. Responsible lobbying activities through collaborations with key industry stakeholders as well as encouraging fair competition are also noticeable positive impacts. On the other hand, potential breaches of internal policies could, if applicable, pose a regulatory risk to the company and hence could financially affect to Amadeus (financial performance, cash flows, and access to finance and cost of capital).	Amadeus addresses these material impacts and risks through the Corporate Compliance Program and the commitment "Be a reference of trust and integrity", and the related lines of actions included in the ESG Ambition.	Sections ESRS G1 - Business conduct and section Sustainability-related goals in SBM-1- Strategy, business model and value chain contain specific details.

Material impacts, risks and opportunities

Topic / Sub - topic / Entity specific	Scope/ Concentration	Time horizon	Description of the IROs and financial effects	Strategy and/or business model ¹	More references
Tax (entity specific) 	Own operations	-	Tax payment is one of the most positive impacts generated by Amadeus due to the financial contribution to public funds in the countries in which the Company operates (more than 190).	Amadeus addresses this material impact through its Tax Policy, practices and programs on corporate and tax governance, and the commitment "Be a reference of trust and integrity", and the line of action "Trusted advisors", included in the ESG Ambition.	Sections Fair and transparency tax practices (entity specific) contains specific details.
Cybersecurity and data privacy (entity specific)   	Own operations and value chain	Short/ Medium-term	Due to the activity of Amadeus, one of its key impacts is linked to the protection of stakeholder private data due to the state of the art in cybersecurity practices, that may affect to those managed in the value chain as well. Likewise, main risks could come from failure in cybersecurity and privacy obligations, which could lead to operational outages, financial losses and damage to Amadeus' reputation.	Amadeus addresses these material impacts and risks by the implementation of cybersecurity measures and a mature cybersecurity culture. the Privacy Program and the commitment "Be a reference of trust and integrity", and the line of action "Quality and security", included in the ESG Ambition.	Sections Cybersecurity (entity specific) and Data privacy (entity specific) specific details.

¹The Board reviews and approves Amadeus' sustainability strategy. The Audit Committee supervises compliance with Amadeus' sustainability strategy and related policies, including the company's performance.

The ESG Steering Committee reviews the status of the company's ESG strategy, follows up compliance matters, and makes key strategic decisions related to sustainability. The Steering Committee meets quarterly. The Executive Committee serves as the final authority on decisions. See sections *ESRS 2 GOV-1- The role of the administrative, management and supervisory bodies* and section *Sustainability-related goals* included in *ESRS 2 SBM-1-Strategy, business model and value chain* for further details.



Positive impact



Risk



Negative impact



Opportunity

2. ENVIRONMENTAL INFORMATION

Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation)

Regulatory background

The Taxonomy Regulation is a key component of the European Commission's action plan to reorient capital flows towards a more sustainable economic growth. It represents an important step towards reaching the objectives of the European Green Deal, as achieving carbon neutrality by 2050. The EU Taxonomy is a classification system for environmentally sustainable economic activities, defined to help companies and investors to make sustainable investment decisions.

The EU Taxonomy sets out the following six environmental objectives, and provides for each of them a list of economic activities, with the description and the conditions to qualify as environmentally sustainable:

1. Climate change mitigation (CCM).
2. Climate change adaptation.
3. The sustainable use of water and protection of marine resources.
4. The transition to a circular economy.
5. Pollution prevention and control.
6. The protection and restoration of biodiversity and ecosystems.

In this regard, the regulatory framework applicable as of 31 December 2024 is the following:

- Regulation (EU) 2020/852 (“EU Taxonomy Regulation”) on the establishment of a framework to facilitate sustainable investments.
- Delegated Act (EU) 2021/2139 (“Climate Delegated Act”), establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.
- Delegated Act (EU) 2021/2178 (“Disclosures Delegated Act”), specifying the content and presentation of information to be disclosed by undertakings.
- Delegated Act (EU) 2022/1214 (“Complementary Climate Delegated Act”) and Delegated Act (EU) 2023/2485 (amending Climate Delegated Act with additional technical screening criteria for certain activities not previously covered).
- Delegated Act (EU) 2023/2486 (supplementing regulation for the rest of taxonomy objectives).
- Delegated Act (EU) 2024/3215 correcting certain language versions of Delegated Act (EU) 2021/2139 (“Climate Delegated Act”).

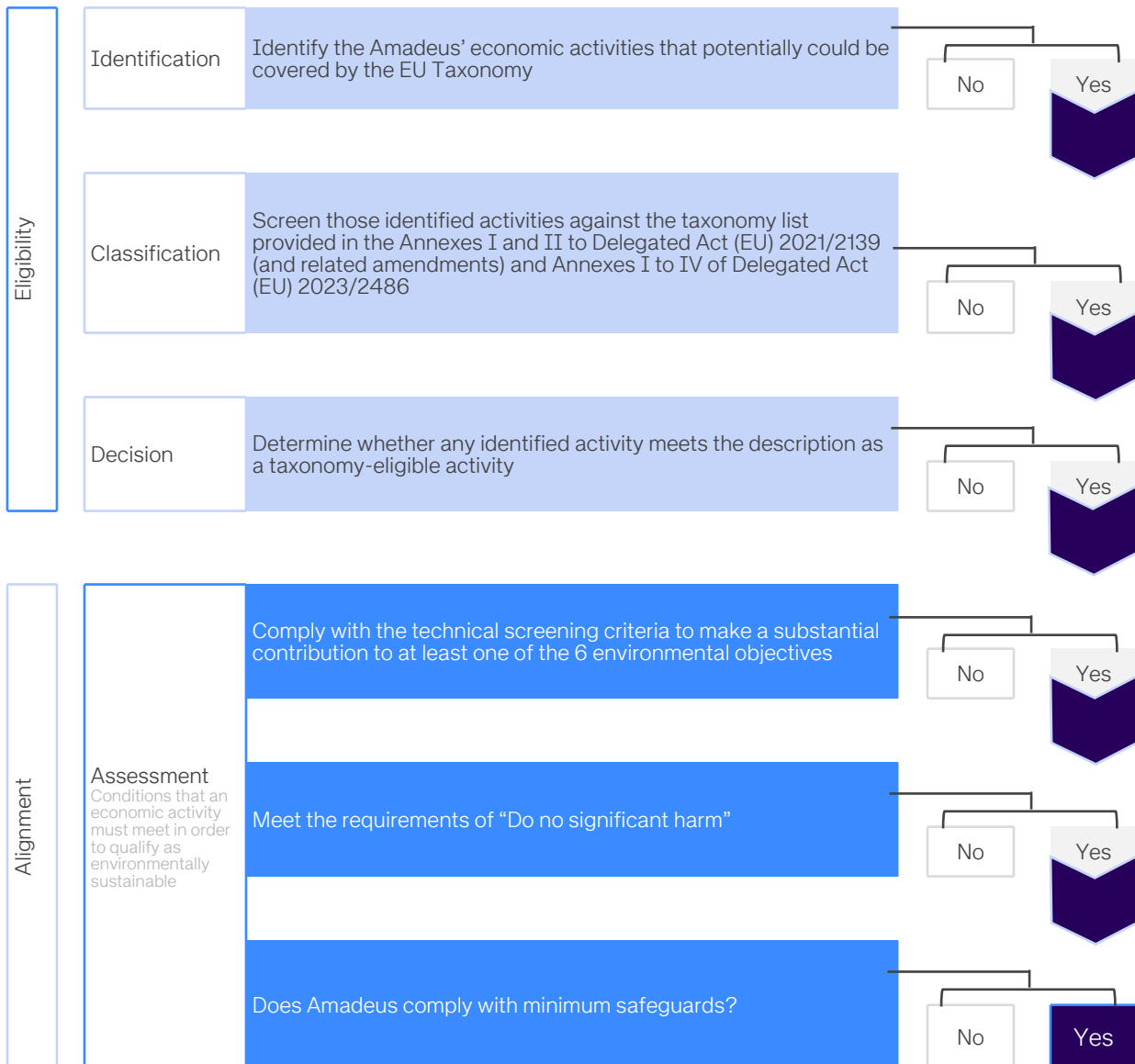
Under this regulatory framework, companies are required to report whether their economic activities qualify as eligible and, if so, they are also aligned according to environmentally sustainable criteria

established in the aforementioned regulations. For these economic activities, companies need to report three economic indicators, namely the following key performance indicators: percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) that those activities represent out of the total.

The Taxonomy is a dynamic framework that should expand its scope of activities overtime, in particular by including new activities and sectors within the Annexes of the Delegated Acts.

Assessment of compliance with Regulation (EU) 2020/852

Amadeus has carried out the following process to identify to what extent its Group activities are covered (eligible economic activities) and which of these activities meet the required criteria (aligned economic activities) according to the EU Taxonomy regulation.



a) Nature of the taxonomy-eligible and taxonomy-aligned economic activities

Following the assessment process of previous year, during 2024, Amadeus conducted an analysis mapping the eligibility of the economic activities for the six environmental objectives to the EU Taxonomy Regulation. As a result, no additional eligible activities have been identified and, therefore, the same activity as last year “8.1 Data processing, hosting and related activities” remains as Amadeus’ only taxonomy-eligible economic activity related to the climate change mitigation objective^{41, 42}.

Activity 8.1 consists of the storage, manipulation, management, movement, control, display, switching, interchange, transmission, or processing of data through data centers, including edge computing.

This economic activity does not generate revenues independently from the other business activities performed by Amadeus. Amadeus revenues are mainly derived from a single performance obligation consisting of making technology services available for a customer to use as and when the customer decides.

The activity 8.1 is a component of that performance obligation and cannot be isolated from the development, marketing, and commercialization activities of Amadeus for the provision of access to its products and services through its own or third parties’ data centers.

Once the taxonomy-eligible activity has been identified, Amadeus has also assessed the compliance with the taxonomy-alignment requirements laid down in the EU Taxonomy Regulation required for the Data processing, hosting and related activities to substantially contribute to climate change mitigation. Amadeus has carried out a qualitative analysis of the substantial contribution criteria, DNSH and social minimum safeguards to verify the fulfillment of the conditions required. The outcome of this analysis is that Amadeus’ taxonomy-eligible economic activity is not taxonomy-aligned.

Amadeus data processing activities that qualify as eligible are fundamentally carried out at the main Data Center in southern Germany and in the public cloud. The Amadeus expectations are that this migration of data processing activities to a public cloud, will allow the data processing economic activity to be aligned with taxonomy requirements in the future. Please refer to the section “Assessment of compliance with the taxonomy alignment criteria” for additional details on the assessment performed, that will help to understand the conclusion achieved. Please refer also to the section “Economic activities analyzed beyond those reported as eligible”, in order to have a complete view on how Amadeus faces sustainability and environmental performance.

b) Assessment of compliance with the taxonomy alignment criteria

The analysis to assess if the data processing, hosting and related activities, which have been identified as taxonomy-eligible activity, substantially contribute to climate change mitigation and therefore are taxonomy-aligned, requires the verification of the fulfillment of the conditions included in Article 3 of Regulation 2020/852 and in the technical screening criteria, included in Annex I of the “Climate Delegated Act”.

⁴¹ As explained in section below, given the particularities about the Amadeus business, it is difficult to match its activities to the EU Taxonomy list of eligible activities. In Amadeus’ understanding, some significant activities of Amadeus that contribute to the environmental sustainability of the travel industry are not included in the current list of Taxonomy activities. Moreover, a large proportion of the sustainability benefits of its solutions is intertwined with the rest of the functionalities of Amadeus products and services. They often represent a marginal element of its value proposition, CapEx and OpEx and do not produce any relevant turnover. Finally, some of Amadeus’ activities, and their contribution to sustainability can hardly be evaluated independently of the wider system in which these activities operate. See section *Economic activities analyzed beyond those reported as eligible* for more details, including some particular examples.

⁴² According to the analysis carried out, Amadeus does not contribute to the other environmental objectives by any other activity covered by the Taxonomy.

As for the technical criteria of Annex I of the “Climate Delegated Act”, Amadeus has performed an assessment individually at the level of each of the different data centers that it operates directly or through subcontractors.

1. Substantial contribution to climate change mitigation

Two main technical criteria must be fulfilled under the substantial contribution of the activity 8.1 to climate change mitigation:

- Firstly, relating to the compliance with the relevant expected practices set out in the EU Code of Conduct of Data Center Energy Efficiency or in CEN-CENELEC document CLC TR50600-99-1, Amadeus has renewed the EN 50600 certificate. The EN 50600 certificate was created by the European Committee for Electrotechnical Standardization (CENELEC). It is an European standard for data centers that uses a holistic approach to provide comprehensive specifications for the planning, construction, and operation of data centers. It defines requirements for the planning of the trades, building construction, electrical supply, air conditioning, cabling and security systems, and specifies criteria for the operation of data centers. The EN 50600 was renewed for Amadeus in August 2023 and is valid until August 2026.

In addition, Amadeus obtained the new and additional certification according to ISO/IEC22237. The international standard ISO/IEC 22237 (Information technology - Data centre facilities and infrastructures) creates the fundamental prerequisite for ensuring that data centres can be planned, built and operated according to the same principles worldwide in the future. The ISO/IEC 22237, it is an international standard analogous to EN 50600, takes a comprehensive approach covering aspects of data centre facilities and infrastructure. This includes requirements for availability and security as well as the energy efficiency and sustainability of physical infrastructures.

- Secondly, regarding the requirement that the global warming potential (GWP) of refrigerants used in the data center cooling system does not exceed 675, it should be noted that more than half of the Amadeus data processing activity is carried out at Amadeus main Data Center in Erding (Germany). The refrigerant used at the Data Center has a global warming potential (GWP) of 1,430. Consequently, it is not compliant with the taxonomy-alignment requirement. In most of the rest of data centers Amadeus uses, the situation regarding refrigerants used is similar to the Data Center in Erding.

The refrigerant of this Data Center has not been changed to one that is compliant with the GWP Taxonomy requirement due principally to the following reasons:

- In contrast with the EU Taxonomy regulation, the current EU F-gas regulation, does not ban the refrigerant used by Amadeus until 2030. In Amadeus’ understanding, it is uncertain what refrigerant will be required to use after that date by the EU F-gas regulation.
- Amadeus considers the GWP is only materialized if the gas is leaked and released into the atmosphere. Consequently, anti-leakage systems that were implemented at Amadeus main Data Center become very relevant, and these measures do not seem to be considered by the EU Taxonomy.
- A refrigerant with lower GWP is generally less energy efficient and more flammable. Therefore, a replacement of the refrigerant will likely require an investment in infrastructure to guarantee safety and an increased use of electricity for cooling purposes. Therefore, there is a certain trade-off between energy efficiency and a low GWP.

- Amadeus is progressively migrating data processing activities to the cloud. Consequently, the significant investment required for the implementation of a compliant refrigerant—which in case of Amadeus will require also the replacement of significant hardware infrastructure—will imply relevant direct and indirect emissions of greenhouse gases, and will only be used for a limited period of time.

Regarding data processing activities subcontracted to Microsoft (public cloud), Microsoft has informed Amadeus that it is not in a position to provide a “breakdown of activities” against the definition set in section 8.1 of Annex I to the Climate Delegated Act or to report a related “weight of each activity,” as Amadeus has requested. Microsoft’s subsidiaries in the European Union and European Economic Area will only first come into scope of the Taxonomy Regulation’s reporting obligations for financial years starting on or after January 1, 2025. Microsoft has committed to keep Amadeus updated regularly as when they make further determinations (and announcements) about its engagement with the Taxonomy Regulation and its criteria for data centers.

2. Do no significant harm (DNSH)

The criteria of DNSH ensures that the economic activity does not impede the other environmental objectives of the EU Taxonomy from being reached, meaning that it has no significant negative impact on them.

Article 17 of the Taxonomy Regulation requires activities to meet DNSH criteria for the six environmental objectives. Annex I of the Climate Delegated Act provides the specific technical screening criteria for DNSH compliance.

The status of Amadeus’ assessment is summarized below for each of the other applicable environmental objectives of the Taxonomy (Pollution prevention and control and protection and restoration of biodiversity and ecosystems are not applicable to data processing, hosting and related activities).

• Climate change adaptation

In 2024, Amadeus has updated the climate related risk analysis using the TCFD guidelines. The purpose of this exercise has been to update and complement the qualitative assessment undertaken previously, using scenarios from the Intergovernmental Panel on Climate Change (IPCC) and the Network for Greening the Financial System (NGFS).

Particularly, the analysis of the physical climate change related risks has been based on scenarios including, short- and long-term climate projections:

- High and very high GHG emissions scenarios (RCP 8.5, SSP3-7.0 and SSP5-8.522).
- The intermediate GHG emissions scenario (RCP 4.5 and SSP2-4.5).
- The very low and low GHG emissions scenarios (RCP 2.6, SSP1-1.9 and SSP1-2.6).

Further details are explained in sections *ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model* and *ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities*.

• Sustainable use and protection of water and marine resources

The requirements set in Annex 1 of the “Climate Delegated Act” related to water use are not applicable to Amadeus activity. Additionally, water consumption has not been identified as a material issue in the materiality analysis. For the Data Center in Erding, permits for the withdrawal and discharge of water/wastewater have been received. The local regulations are fulfilled in this aspect. Further information is available in section *Water consumption*, included in the *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*

- Transition to a circular economy

Given the nature of Amadeus business as an IT provider, this topic is more material for its hardware providers than for its own operations. It should also be noted that through the double materiality assessment, Amadeus has not identified any material impacts, risks or opportunities related to resource use and the circular economy associated with its own operations or its upstream and/or downstream value chain. See more information in section *Circular economy and use of resources*, included in the *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*.

3. Minimum social safeguards

In October 2022, the “Final Report on Minimum Safeguards”⁴³ was published, which provides recommendations to undertakings for evaluating compliance with minimum social guarantees (minimum safeguards).

The Report proposes four pillars (Human Rights, Corruption, Taxation and Fair Competition) and several criteria to comply within each of them. If any of the criteria in each pillar are not met, the Minimum Safeguards requirements will not be fulfilled.

Based on this Report, Amadeus has considered the following aspects to evaluate its compliance at Group level.

- Human Rights⁴⁴

In 2023, Amadeus started to update its due diligence process in the field of human rights and environment, following the United Nations Guiding Principles (UNGPs) on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, with the support of an external expert. The purpose of this exercise is to properly identify potential adverse impacts on human rights and adequately prioritize, address and manage them.

Following UNGPs on Business and Human Rights recommendations, Amadeus focuses on areas where it can exert more influence, effectively transferring this focus throughout its supply chain. In this sense, Amadeus has renewed its Human Rights policy in 2024. This Policy takes as a reference the United Nations Global Compact (UNGC), the Universal Charter of Human Rights, International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, UNGPs, the European Social Charter and the OECD Guidelines for Multinational Enterprises.

Additionally, in 2024, Amadeus assessed and prioritized potential human rights impacts through the double materiality assessment.

Moreover, human rights form part of Amadeus’ risk management framework. The company evaluates the risks of infringing on the following rights:

- Fair and favorable working conditions (including zero tolerance towards child labor or forced labor).
- Fair wages/compensation.
- Freedom of association/collective bargaining.
- Diversity, inclusion and non-discrimination.
- Health and safety (including reconciliation and rest).
- Data protection.

⁴³ https://finance.ec.europa.eu/system/files/2022-10/221011-sustainable-finance-platform-finance-report-minimum-safeguards_en.pdf

⁴⁴ See more information in section GOV-4 – Statement on due diligence.

These risks are not assessed as high on the Corporate Risk Map. Notwithstanding, Amadeus has implemented a series of mitigating and monitoring actions to manage these risks, both internally and with third parties.

Incidents of non-compliance with the Amadeus Human Rights Policy can be reported through the corporate whistleblower channel called the Speak Up Channel, which is a safe, confidential and anonymous tool available internally and externally. See more information in sections *S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns* and *Amadeus Speak Up channel and investigations*.

Finally, it is worth noting that in 2024, no fines, penalties, or compensation for damages were issued as a result of complaints received through the Speak Up channel. Furthermore, no complaints (0) were reported to the National Contact Point for the OECD Multinational Enterprise.

- Corruption

Amadeus has a zero-tolerance approach to acts of bribery and corruption by employees or anyone acting on behalf of Amadeus. These commitments guide the Amadeus corporate policies related to the prevention of illegal activities such as bribery and corruption, in particular in the Anti-Bribery & Anti-Corruption Policy, and are materialized through a set of prevention, detection and mitigation initiatives and processes.

Additionally, in 2024, Amadeus did not receive any convictions or fines for violating anti-corruption or anti-bribery laws.

See more information in sections *G1-1 - Business conduct policies and corporate culture*, and *G1-3 - Prevention and detection of corruption and bribery*.

- Taxation

Through the Corporate Tax Policy, approved by the Board of Directors, Amadeus sets out the group's tax principles, based on ensuring compliance with applicable tax regulations, excellence and commitment to the application of good tax practices appropriate to the corporate and governance structure of the Group.

The Company has established different structures and initiatives to contribute to the achievement of the Tax Policy commitments. Among others, Amadeus has defined a tax risk management and control system whose objective is to apply tax compliance standards in every company included in the Group.

Additionally, in 2024, Amadeus faced no criminal convictions related to tax evasion.

See more information in section *Fair and transparency tax practices (entity specific)*.

- Fair competition

As reflected in the Antitrust and Competition Policy, Amadeus considers compliance with applicable antitrust or competition laws and the maintenance of high ethical standards to be among the company's highest priorities. This Policy is designed to set forth the general principles of antitrust and competition laws that apply to Amadeus globally and to help Amadeus employees understand how these affect their day-to-day work.

Amadeus employees at different levels are responsible for being familiar with and avoiding anticompetitive activities. In this regard, the Corporate & Legal Affairs department frequently organizes training sessions to remind employees of the Policy and explain the obligations and exemplary practices. Particularly, during 2024, Amadeus launched an e-learning course in Antitrust and Competition Law Compliance.

Additionally, in 2024, a class action complaint was filed in a US federal court in Illinois against Amadeus and several hotels for alleged infringement of US antitrust laws. Amadeus disputes the allegations and is defending itself vigorously in this lawsuit. Amadeus is not subject or party to any other legal actions pending or completed regarding anti-competitive behavior and has not been identified as a participant in any other violations of anti-trust and monopoly legislation.

See more information in section *Fair competition*

Key performance indicators (KPIs) and accounting policy

The following tables summarizing the three KPIs reported for the financial years from 1.1.2024 to 31.12.2024 and from 1.1.2023 to 31.12.2023, respectively.

December 31, 2024				
	Total (M€)	Proportion of taxonomy-eligible economic activities (in %)	Proportion of taxonomy-aligned economic activities (in %)	Proportion of taxonomy-non-eligible economic activities (in %)
Turnover	6,141.7	7.3%	0%	92.7%
CapEx	1,079.4	1.7%	0%	98.3%
OpEx	694.4	10.5%	0%	89.5%

				December 31, 2023
	Total (M€)	Proportion of taxonomy-eligible economic activities (in %)	Proportion of taxonomy-aligned economic activities (in %)	Proportion of taxonomy-non-eligible economic activities (in %)
Turnover	5,441.2	6.8%	0 %	93.2%
CapEx	658.0	2.0%	0 %	98.0%
OpEx	624.8	10.1%	0 %	89.9%

The required templates under Annex II of the “Disclosures Delegated Act”, as updated by Annex V of Commission Delegated Regulation (EU) 2023/2486, are included in Tables I, II and III at the end of this section.

In order to calculate the turnover, CapEx and OpEx indicators, all the data used have been extracted from Amadeus IT systems, which are designed to collect and store information accurately. These systems are based on robust and precise processes, with efficient internal controls in place that are regularly reviewed. Consistent information sources have been used to prevent the same item from being considered under the same KPI. This information is also audited by an external auditor on a regular basis. All of this contributes preventing double counting.

The taxonomy-eligible KPIs have been determined in accordance with the legal requirements of Annex I of the “Disclosures Delegated Act”. The Amadeus taxonomy-eligible activity does not comply with all the technical screening criteria to substantially contribute to the taxonomy objective of climate change mitigation; therefore, nothing has been disclosed in this respect on the description of Amadeus’ accounting policies below. For additional details on the assessment performed, please relate to section “Assessment of compliance with the taxonomy alignment criteria”.

The turnover, CapEx and OpEx considered cover all the activities across the Amadeus IT Group and correspond to the scope of consolidation as described in note 2.3 *Consolidation scope* of Amadeus consolidated Annual Accounts.

A. KPI related with turnover

The proportion of taxonomy eligible economic activities in the Amadeus total turnover has been calculated as the part of net turnover derived from products and services associated with taxonomy eligible economic activities (numerator) divided by the total net turnover (denominator), in each case for the financial years from 1.1.2024 to 31.12.2024 and from 1.1.2023 to 31.12.2023, respectively.

Revenues derived from the stand ready obligation to make available Amadeus platforms and software to customers can be reconciled to note 12.1- *Disaggregation of revenue from contracts with customers*- of Amadeus consolidated annual accounts. The allocation key is not directly reconciled to the consolidated annual accounts since it takes into consideration the costs of Amadeus development, data and distribution centers.

The numerator of the turnover KPI is defined as the net turnover derived from products and services associated with taxonomy-eligible economic activity 8.1 “Data processing, hosting and related activities” that can be reconciled to our consolidated annual accounts, c.f Note 12.1. As explained above under “Nature of the taxonomy-eligible and taxonomy-aligned economic activities”, net revenues derived from the stand ready obligation to make available Amadeus products and services to customers cannot be allocated entirely to this economic activity. To assess the amount of turnover that would relate to this taxonomy-eligible activity, it has been used a ratio based on the relative weight of the costs associated with Amadeus data centers operations over the total costs of the development, marketing, commercialization, and data processing activities.

The denominator of the turnover KPI is based on Amadeus consolidated net revenue in accordance with IAS 1.82(a). For further details on accounting policies regarding Amadeus consolidated net revenue, cf. note 4.2.8 *Revenue from contracts with customers* of Amadeus’ consolidated annual accounts for the year ended December 31, 2024. Amadeus consolidated net turnover can be reconciled to our consolidated annual accounts, c.f. the consolidated statement of comprehensive income (revenue).

During 2024, total eligible turnover has risen by 21.9%, which is higher than the Amadeus’ total revenues which has increased by 12.9%. This is due to the data center's increased weight in the KPI calculation.

B. KPI related with capital expenditure (CapEx)

The CapEx KPI is defined as taxonomy-eligible CapEx (numerator) divided by the total CapEx of Amadeus (denominator).

CapEx consists of additions to tangible and intangible fixed assets during the financial year, before depreciation, amortization, and any re-measurement, including those resulting from impairments. It includes acquisitions of property, plant and equipment (IAS 16), intangible assets (IAS 38), and right-of-use assets (IFRS 16). Additions resulting from business combinations are also included. Goodwill is not included in CapEx, as it is not defined as an intangible asset in accordance with IAS 38. For further details on accounting policies regarding Amadeus’ CapEx, cf. note 4.2.4 “*Intangible assets*”, note 4.2.5 “*Property, plant and equipment*”, and note 4.2.6 “*Leases*” of Amadeus’ consolidated annual accounts.

The numerator consists of the CapEx related to assets or processes that are associated with taxonomy-eligible economic activities (“category a”). Amadeus considers that assets and processes are associated with taxonomy-eligible economic activities when they are essential components necessary to execute an economic activity.

For the year ended as of December 31, 2024, total CapEx directly invested on the data centers amounts to €18.6 million. Despite the expected decrease in CapEx resulting from the cloud migration

strategy, this increase is primarily due to the required equipment renovations at the Erding data center to ensure ongoing operations.

Amadeus does not include CapEx related to the purchase of output from taxonomy-eligible economic activities and individual measures enabling certain target activities to become low-carbon or to lead to greenhouse gas reductions. They are also considered as taxonomy-eligible CapEx when the purchased output/individual measure meets the description of its respective economic activity. As reliable statements on the taxonomy-alignment of Amadeus suppliers' output are currently not available and as it is not a significant amount, no CapEx/OpEx is reported for this category.

For the year ended December 31, 2024, the total CapEx can be reconciled to Amadeus' consolidated annual accounts, cf. note 7.2 *Intangible Assets*: "Additions, €10.4 million", "Additions of Software internally developed €712.1 million", "Changes in consolidation perimeter €217.6 million", note 8 *Property, plant and equipment*: "Additions €79.9 million" and "Changes in consolidation perimeter €4.9 million" and note 9 *Leases*: "Additions € 51.6 million" and "Changes in consolidation perimeter €2.9 million".

For the year ended December 31, 2023, the total CapEx can be reconciled to Amadeus consolidated annual accounts, cf. note 8 *Intangible Assets*: "Additions €5.0 million", "Additions of Software internally developed €554.1 million", note 9 *Property, plant and equipment*: "Additions €66.2 million" and note 10 *Leases*: "Additions €32.7 million".

As of December 31, 2024 total proportion of eligible Capex (1.7%) slightly decreased due to the impact of business combinations during the fiscal year.

C. KPI related with operating expenditure (OpEx)

The OpEx KPI is defined as taxonomy-eligible OpEx (numerator) divided by the total OpEx (denominator).

OpEx, according to the taxonomy definition, consists of direct non-capitalized costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment.

OpEx includes specifically:

- Research and development expenditure recognized as an expense during the reporting period in Amadeus' consolidated statement of comprehensive income (cf. note 4.2.4 *Intangible assets* of Amadeus' consolidated annual accounts). This includes all non-capitalized expenditure that is directly attributable to research or development activities, in line with Amadeus consolidated annual accounts (IAS 38.126) .
- Maintenance and repair and other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment were determined based on the maintenance and repair costs allocated to Amadeus internal cost centers. The related cost items can be found in various line items in Amadeus' consolidated statement of comprehensive income, including personnel and related expenses (maintenance and repair of IT-systems and infrastructures).

With regard to the numerator, reference is made to the corresponding statements on the CapEx KPI. Only OpEx relating to "category a" were included.

As of December 31, 2024 and 2023 total eligible OpEx amounts to €73.3 million (10.5%) and €63.3 million (10.1%), respectively, higher than previous year due to business growth and increase in maintenance costs from external providers.

Economic activities analyzed beyond those reported as eligible

Amadeus is a technology company dedicated to the travel industry. Amadeus provides IT solutions and services for the travel industry: airlines, airports, ground handlers, car rental companies, corporations, cruise and ferry operators, hotels and event venues, insurance providers, travel sellers, tourism boards, travelers themselves and more. Amadeus facilitates complex transactions between travel providers and travel sellers and delivers mission critical IT solutions for travel companies. See more details in section *ESRS 2 SBM-1- Strategy, business model and value chain*

Amadeus has built a commercial and operational network all over the globe, which facilitates the commercialization of products for travel providers, reducing their fixed costs of distribution and the risks associated with them, making their operations more flexible and efficient.

In addition, Amadeus's large IT customer base supports its R&D investment, leading to the development of advanced technology solutions, making them available to its customers in a flexible manner, reducing the risks and fixed costs associated with internal investment in IT infrastructure and developments. This is particularly relevant and valuable in the context of frequent mergers and acquisitions in the sector.

The Amadeus' large network of customers, level of R&D investment and travel expertise are key elements of Amadeus' value proposition and of its contribution to making the travel industry more efficient from the operational and sustainability points of view.

Overall, Amadeus' business is successful to the extent it helps to improve the operational, economic and environmental efficiency of travel industry players.

Given the particularities about the Amadeus business explained above, it is difficult to match its activities to the EU Taxonomy list of eligible activities. In Amadeus' understanding, some significant activities of Amadeus that contribute to the environmental sustainability of the travel industry are not included in the current list of Taxonomy activities. Moreover, a large proportion of the sustainability benefits of its solutions is intertwined with the rest of the functionalities of Amadeus products and services. They often represent a marginal element of its value proposition, CapEx and OpEx and do not produce any relevant turnover. Finally, some of Amadeus' activities, and their contribution to sustainability can hardly be evaluated independently of the wider system in which these activities operate.

The paragraphs below further elaborate and provide examples of the cases described above. Some of Amadeus activities may fall in more than one of these categories.

Other economic activities with positive sustainable impacts not yet considered in the Taxonomy

Besides economic activities currently included in the EU Taxonomy, Amadeus is involved in other economic activities that improve the operational efficiency of its customers, and this operational efficiency also implies improved environmental performance, typically through reduced fuel consumption.

For example, Amadeus' Altéa Departure Control Flight Management was developed to optimize aircraft load with enhanced efficiency and precision compared to previous solutions, boosting productivity and centralizing operations in one place. The solution delivers a range of benefits for the airline, including:

- Improved flight departure monitoring.
- Improved capacity management with load distribution and balance automatically calculated.

- Efficient ground handling management by applying carrier preferences and processes.
- Optimize staff management through easier shift scheduling, dangerous goods certifications and load controller licensing and validation.

All of the above benefits, and particularly the optimized aircraft trim, facilitate a reduction of fuel used and CO₂ emissions released into the atmosphere. Amadeus carried out a study with our customer Finnair back in 2011, analysing the performance of approximately 40,000 flights. The analysis concluded that the Amadeus solution helped the airline to improve the estimation of fuel needed and significantly reduced the unnecessary fuel burn.⁴⁵ In 2024, Amadeus and Accenture produced a similar research. The study concluded that the estimated CO₂ savings facilitated by Amadeus Altéa DCS FM and Amadeus Sequence Manager combined, aggregated at industry level, can deliver emissions reductions equivalent to 0.6% of total aviation emissions annually. Consequently, the contribution of IT solutions to sustainability is very relevant, in Amadeus' understanding.

The activity to build and implement this software could not be matched with any of the activities of the Taxonomy list of eligible activities, despite the fact that the solution is very efficient and reduces emissions compared to other less sophisticated solutions in the market.

Activities that contribute directly or indirectly to sustainability, with a low relevance in terms of turnover, CapEx or OpEx

In 2024, Amadeus processed 471.2 million airline bookings. The Amadeus distribution platforms, through which the bookings are processed, provide users three critical pieces of information to help the traveler to make her/his travel purchase decision, i.e., airline schedules, availability of seats and fares. In addition, Amadeus distribution platforms provide information on estimated CO₂ emissions per passenger for the specific itineraries the traveler is searching. This information of estimated CO₂ emissions per passenger is currently obtained by Amadeus thanks to our agreement with the UN International Civil Aviation Organization (ICAO). We are planning to expand this service to other means of transportation and also to other calculators that include more granular information related to sustainability performance beyond greenhouse gas emissions. In this respect, Amadeus joined the Travalyt Coalition in 2022. Travalyt is a global coalition of some of the largest brands in the travel and technology sector. Travalyt aims to bring travel related sustainability information to the mainstream to help travelers make more sustainable travel choices (see more information in section *G1-5 - Political influence and lobbying activities*).

The purpose of providing this information to the traveler is to help travelers factor in sustainability elements in their purchasing decisions. Considering that Amadeus delivers this information to millions of travelers, a relevant contribution can be made to raise awareness of sustainability impacts and facilitate the selection of more sustainable travel options.

This information element of our value proposition is an addition to our distribution platforms that does not produce any direct turnover, and it will be difficult and mostly arbitrary to estimate any indirect turnover based on the enhanced value it delivers to the Amadeus distribution platform. In addition, the investment required to implement this functionality is minor compared to the overall company CapEx and OpEx.

In conclusion, Amadeus believes that informing millions of travelers about the CO₂ emissions released due to their trips contributes to influence them to choosing more sustainable travel options, however this activity is not contemplated in the current EU Taxonomy regulation and it would be difficult to measure its impact based on turnover obtained, or CapEx and OpEx spend.

⁴⁵ The main results of the study were published at <https://amadeus.com/documents/en/airlines/case-study/amadeus-air-dispatch-case-study.pdf>

Activities whose role in sustainability can hardly be evaluated in isolation

The travel industry needs to be considered as an overall system in which the different players interact, and the overall efficiency of the system depends on individual performance, and also in the way different players cooperate.

For example, the airline industry has developed over the years certain standards regarding critical issues like safety, messaging, using codes that permit combined operations like interlining⁴⁶ or code sharing⁴⁷ that have contributed to reaching load factors⁴⁸ above 80%, and this would be very difficult, if not impossible, to reach by individual airlines in isolation or by alternative means of transportation.

Similarly, Amadeus has developed solutions to help our customers become more efficient, but the improved efficiency in many cases requires cooperation from many players. For example, Amadeus Sequence Manager is a tool implemented at airports like Munich or Copenhagen. Sequence Manager brings a collaborative approach to optimize flight departure processes. Sequence Manager optimizes the order in which flights should depart from their stands, reducing the amount of time aircraft spend on the runway before taking off.

The solution enables a common situational awareness, shared among the airport stakeholders. The solution is based on key performance indicators, preferences, and pre-defined criteria to maximize the use of all available airport resources, minimizing overall delays, reducing fuel use, emissions released, local pollution per passenger flown and economic costs.

Sequence Manager brings benefits to parties involved.

- For airport operators, it helps optimize the overall airport capacity making better use of existing infrastructure.
- For aircraft operators, it reduces fuel costs and improves punctuality, with less time spent on the runway and delays. The reduced fuel used means less greenhouse gas emissions and less local pollution per passenger carried.
- Finally, it enhances the passenger experience by diminishing the chance of delays and missed connections, which in turn reduces the negative environmental impact of disruptions.

Sequence Manager is utilized by airports, but it needs collaboration from other airport stakeholders to reach its full potential. As explained above, the solution provides benefits beyond Amadeus' commercial relationship with the airport. Accordingly, the sustainability improvements provided cannot be measured only in terms of the customer that uses the solution but in the overall airport system in which the solution operates. Consequently, Amadeus does not see a strong correlation between the turnover, CapEx or OpEx linked to the solution and the sustainability benefits provided by its use.

As the main sustainability benefits are linked to many of the stakeholders involved in the operation of Amadeus Sequence Manager and to the overall system in which the solution operates, we could not match this activity with any of the listed in the Taxonomy Regulation.

Based on the reasoning above, Amadeus is evaluating the calculation of scope 4 emissions, i.e., emissions reductions that occur outside of a product's life cycle or value chain, but as a result of the use of that product, so that it can provide visibility of the benefits explained in the points above. Based on the study commissioned by Amadeus, external consultants estimated annual CO₂ savings

⁴⁶ Interline refers to a commercial agreement between airlines to handle passengers traveling on itineraries that require more than one flight and more than one airline. As opposed to code sharing, interlining implies there is more than one operating carrier

⁴⁷ Code sharing is a marketing agreement between two or more airlines by which one or more airlines sell tickets on a flight operated by another airline.

⁴⁸ Load factor in this case is defined as the number of passengers of an aircraft divided by the total seating capacity of the aircraft. Obviously, the higher the load factor, the more efficient the flight is in fuel and greenhouse gas emissions per passenger

of 4,000 tons only in one of the airports in which the solution operates. These savings are estimated based on a methodology developed specifically to evaluate savings in comparison to other existing solutions in the market but, unfortunately, there is no standard mechanism to quantify these savings.

Based on the ample room for interpretation that in Amadeus understanding the Taxonomy allows, a prudent approach is being taken. In case of doubt, activities are not being included as eligible. Nonetheless, Amadeus continues to monitor several activities that could be considered eligible for future reporting years.

[Annex 2. Templates for KPIs- Taxonomy eligible activities](#)

Table I – Proportion of turnover from products or services associated with Taxonomy-eligible and Taxonomy-aligned economic activities

Proportion of turnover																							
Financial year 2024				Year		Substantial Contribution Criteria					DNSH criteria ('Does Not Significantly Harm')												
Economic Activities (1)				Code (2)	Turnover (3)	Proportion of Turnover, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)	
Text					M EURS	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
Alignment data	A. TAXONOMY-ELIGIBLE ACTIVITIES																						
	A.1. Environmentally sustainable activities (Taxonomy-aligned)																						
	Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)					0%														0%			
	Of which Enabling																						
Of which Transitional																							
Eligibility data	A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																						
							EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL											
	Activity 8.1 – Data processing, hosting and related activities			CCM 8.1	450.0	7.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									6.8%		
	Turnover of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)				450.0	7.3%	7.3%														6.8%		
	A. Turnover of Taxonomy eligible activities (A.1+A.2)				450.0	7.3%															6.8%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																							
Turnover of Taxonomy non-eligible activities				5,691.7	92.7%																		
Total				6,141.7	100%																		

Table II – Proportion of CapEx from products or services associated with taxonomy-eligible and taxonomy-aligned economic activities

Proportion of CapEx																					
Financial year 2024		Year		Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')											
Economic Activities (1)		Code (2)	CapEx (3)	Proportion of CapEx, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)	
Text			M EURS	%	Y; N; /EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
Alignment data	A. TAXONOMY-ELIGIBLE ACTIVITIES																				
	A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
	CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)			0%														0%			
	Of which Enabling																				
	Of which Transitional																				
Eligibility data	A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
					EL;N /EL	EL;N/ EL	EL;N/ EL	EL;N/ EL	EL;N /EL	EL;N/ EL											
	Activity 8.1 – Data processing, hosting and related activities		CCM 8.1	18.6	1.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.0%		
	CapEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			18.6	1.7%	1.7%													2.0%		
	A. CapEx of Taxonomy eligible activities (A.1+A.2)			18.6	1.7%														2.0%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																					
CapEx of Taxonomy non-eligible activities			1,060.8	98.3%																	
Total			1,079.4	100%																	

Table III – Proportion of OpEx from products or services associated with taxonomy-eligible and taxonomy-aligned economic activities

Proportion of OpEx																							
Financial year 2024				Year			Substantial Contribution Criteria					DNSH criteria ('Does Not Significantly Harm')											
Economic Activities (1)				Code (2)	OpEx (3)	Proportion of OpEx, year 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)	
Text					M EURS	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
Alignment data	A. TAXONOMY-ELIGIBLE ACTIVITIES																						
	A.1. Environmentally sustainable activities (Taxonomy-aligned)																						
	OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)					0%														0%			
	Of which Enabling																						
	Of which Transitional																						
Eligibility data	A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																						
							EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL											
	Activity 8.1 – Data processing, hosting and related activities				CCM 8.1	73.3	10.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								10.1%		
	OpEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)					73.3	10.5%	10.5%													10.1%		
	A. OpEx of Taxonomy eligible activities (A.1+A.2)					73.3	10.5%														10.1%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																							
OpEx of Taxonomy non-eligible activities					621.1	89.5%																	
Total					694.4	100%																	

ESRS E1 - CLIMATE CHANGE

Amadeus' environmental strategy is based on three pillars:

- **Responsibility.** Addressing the environmental impact of own operations and, to the extent possible, of the value chain. This includes measuring, monitoring, and continuously improving the efficiency of Amadeus' operations.
- **Commitment.** Supporting customers to reduce their own environmental impact. Amadeus develops solutions that help raise awareness of the environmental impact of travel, as well as identifying less impacting options. Amadeus also develops IT solutions that improve their operational efficiency and, in specific solutions, environmental efficiency as well.
- **Collaboration.** Engaging with industry stakeholders in joint sustainability initiatives to address global environmental sustainability challenges.

This three-pillar environmental strategy is incorporated into the broader ESG Ambition, with "Foster environmental sustainability" being one of the four pivotal commitments that Amadeus has pledged to uphold within its sustainability strategy.

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

Since 2022, two environmental metrics have been integrated into the calculation of the Amadeus *Amadeus Performance Plan*, which forms part of the variable remuneration for all employees. The two metrics are:

- Electricity consumption per full-time equivalent worker⁴⁹ (kWh per FTE).
- Scope 1 and 2 emissions reduction in line with the objective to become carbon neutral by 2025.

These two metrics, along with three additional sustainability goals related to social and governance matters, constitute the 12% of the short-term variable remuneration of all Amadeus employees (Annual Bonus).

The Annual Bonus is applicable to all Amadeus employees, including the President and CEO, as well as the members of the Executive Committee. Nevertheless, these metrics do not apply for the members of the Board of Directors.

At Amadeus, the Nominations and Remuneration Committee reviews performance against targets and determines whether payout is appropriate considering the level of achievement in relation to target.

See the section *ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes* containing further details.

E1 - 1- Transition plan for climate change mitigation

In 2024, Amadeus produced its Climate Transition Plan based on the already existing strategy, initiatives and objectives set in previous years, and the validation from the Science Based Targets initiative (SBTi) of Amadeus emissions targets. The Climate Transition Plan (hereafter, "the Plan" as well) has been approved by the Amadeus Sustainability Office. It aligns with the goal of limiting

⁴⁹ Full-Time Equivalent (FTE) is the number of headcount converted to a full-time basis, e.g. an employee working part-time covering 80% of a full-time schedule is considered 0.8 FTE.

global warming to 1.5°C compared to pre-industrial levels, in line with the Paris Agreement and the EU's climate goals, by achieving net zero by 2050. *ESRS E1-1 p. 14*

Amadeus measures its greenhouse gas (GHG) emissions inventory, including scope 1, 2 and 3 emissions, using the Amadeus' Environmental Management System (EMS). Based on that measure and following SBTi validated targets, the Plan sets the following targets:

- Reduce absolute scope 1 and 2 GHG emissions 42% by 2030 from a 2022 base year.
- Reduce absolute scope 3 GHG emissions 25% by 2030 from a 2022 base year.
- Reduce absolute scopes 1, 2 and 3 GHG emissions 90% by 2050 from a 2022 baseline year, and neutralizing the residual emissions by permanently removing carbon from the atmosphere.

Additionally, Amadeus has set an internal target to become carbon neutral by 2025 that follows a formal commitment made in 2017 to carbon neutral growth by joining the UN Climate Neutral Now Pledge. This target covers scope 1 and 2 emissions with an operational control approach, and is independent from and additional to Amadeus' SBTi validated targets.

For more details, refer to *E1 - 4 - Targets related to climate change mitigation and adaptation*.

To achieve these targets, Amadeus will continue implementing actions in the short, medium and long term.

- Reduction. Amadeus implements measures to reduce or eliminate greenhouse gas emissions at its operations and, to the extent possible, at every stage of its value chain.
 - Implementing energy efficiency measures to improve the environmental efficiency of own operations. This applies both to own and rented offices, as well as to Amadeus' data processing activities.
 - Self-sourcing of renewable energy where possible in Amadeus' offices. Making use of market instruments like Guarantees of Origin for renewable energy.
 - Collaborating with its upstream value chain to reduce scope 3 emissions, through cooperative action undertaken with suppliers, and the implementation of environmental criteria in Amadeus purchasing processes.
- Offsetting. Amadeus will continue investing in certified projects that reduce, avoid or remove greenhouse gas emissions. It is important to note that offsetting is not accounted as progress toward Amadeus' SBTi validated targets. It is used to meet Amadeus internal target to become carbon neutral by 2025 as mentioned above.

Additionally, Amadeus is helping customers to decarbonize their activity through the development of technology solutions.

See the section *E1 - 3 - Actions and resources in relation to climate change policies* for more details on climate change key mitigation actions and decarbonization levers.

As of the date of publication of this report, Amadeus has carried out an initial study to evaluate the investments required to meet the targets of the Transition Plan and its alignment with the criteria established in the Commission Delegated Regulation 2021/2139. The volatility of prices for both renewable energy and offsets, as well as the relatively uncertainty regarding the validation of the market instruments to use, make this exercise difficult and with significant margins of errors.

In relation to the locked-in emissions from key assets and products, Amadeus has determined that these emissions should not impede the achievement of GHG emission reduction targets, as plans are currently underway to move from its own data center to cloud-based services⁵⁰.

Finally, based on its activities, the Company is not excluded from the EU Paris-aligned Benchmarks.
ESRS E1-1 p. 16 g

Climate transition Plan and the Amadeus’ strategy

Amadeus’ overall strategy is defined by a set of strategic priorities and guided by Amadeus’ values and material topics. “Keep sustainability principles at the heart of the way we work” is one of the operating pillars that enables the execution of the strategy. This pillar is being deployed through the Sustainability (ESG) Ambition.

Climate change holds a key position in the ESG Ambition. As part of its commitment to “Foster environmental sustainability”, Amadeus monitors and seeks to reduce its environmental impacts, especially those related to climate change, including its value chain, and aims to contribute to the sustainability of the industry by supporting with technology and its sustainability value proposition, wherever possible.

One of the related goals is to achieve science-based carbon emissions reductions in line with the objectives of the Paris Agreement, at a rate compatible with the 1.5 degrees Celsius of maximum increase in temperatures as compared to pre-industrial levels (see further information in section *Sustainability-related goals*). This goal is explained in the Amadeus’ Climate Transition Plan, where Amadeus describes its climate targets, the actions taken and planned to achieve those targets, the governance model guiding this plan are included on it, among other elements.

As previously indicated, the Amadeus Climate Transition Plan has been approved by the Sustainability Office. In addition, the ESG Ambition, including the related goal to achieve science-based carbon emissions reductions in line with the objectives of the Paris Agreement, has been approved by the Board of Directors. See more information in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*

ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model

Material climate change mitigation and energy-related impacts, risks and opportunities have been identified through the double materiality assessment and the climate change risk assessment:

ESRS - E1 - Climate change		
Impacts, risks and opportunities		
Sub-topics	Time horizons	Scope
Climate change mitigation and energy		
- R O	Medium term	Own operations and value chain
- Negative impact R Risk O Opportunity		

Impacts

Amadeus impacts the environment by its direct and indirect GHG emissions, being the full inventory of GHG emissions composed of:

- Scope 1 are direct emissions from the use of natural gas, diesel and refrigerant gases.

⁵⁰ Amadeus primarily leases its offices, and emissions related to its products are residual. Consequently, locked-in emissions are not applicable.

- Scope 2 are indirect emissions from the generation of purchased electricity, used at Amadeus offices and data center.
- Scope 3 are emissions that occur in the value chain, including both upstream and downstream emissions. Upstream emissions are more than 10 times larger than scope 1 and 2 combined.

Further details are included in section *E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions*.

Due to the nature of Amadeus' activities, the scope 1 and 2 GHG emissions are relatively low compared to the total GHG emissions. However, given the relevance of climate change and Amadeus capacity to influence scope 1 and 2 emissions, these have been assessed as relevant to be disclosed.

These GHG emissions occur on a global scale, since Amadeus own and value chain operations are spread around the world.

Accordingly, Amadeus has produced its Climate Transition Plan, based on its targets validated by the SBTi. The Plan describes also the actions planned and already taken to reach the targets. See further information in section above *E1 - 1- Transition plan for climate change mitigation*.

[Risks and opportunities - Resilience plan](#)

In 2024, Amadeus updated its climate-related risks and opportunities analysis using the Task Force on Climate-related Financial Disclosures (TCFD) guidelines, the most recent scenarios from the Intergovernmental Panel on Climate Change (IPCC) and the Network for Greening the Financial System (NGFS). Both physical and transition climate-related risks have been considered (see table below). The methodology and assumptions used, including time horizons, have been explained in section *ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities*.

The assessment covers Amadeus assets and business activities.

The resilience analysis has been conducted alongside the qualitative climate risk assessment, taking into account climate projections. Based on the results, Amadeus has identified existing prevention and mitigation measures, and has provided recommendations to address each specific risk.

It is important to note that some of the issues analyzed can be considered both risks and opportunities. However, for the purpose of the current study, Amadeus has classified them according to their currently prevalent perceived assessment, either as a risk or an opportunity.

The table below provides a summary of the main climate-related physical and transition risks identified, as well as the primary resilience measures implemented by Amadeus to properly manage them.

Climate change-related risks	Description and management measures	Risk assessment
Physical risks, acute and/or chronic By operating in over 190 countries worldwide, Amadeus along its own value chain is exposed to both chronic and acute physical hazards potentially affecting the communities where the Company, its providers and/or customers operate. According to projections, changes in the near term could be small compared to natural variability, but cumulative changes over time could be expected to be transformative in some areas.		
Physical risks affecting the communities where we operate	The risk of increased severity and extreme weather events, and shifts in local climate patterns has been assessed, for the time being, as non-material, given that Amadeus' global presence helps to minimize the impact of local risks. In relation to customers, Amadeus 24-hour follow-the sun customer service is ready to provide extra support if needed. Additionally, Amadeus has built a global team to coordinate social responsibility responses to cope with adverse events occurring in the markets where it operates.	Low to moderate
Physical risks affecting our travel providers and/or customers	In the medium to long term, the probability of any impact affecting any of Amadeus' offices worldwide is relatively high, primarily under high emissions scenarios, due to the company's global presence. Although the impact is generally low, prevention is relatively straightforward, and the mitigation of impact is facilitated by communication technology that, in most cases, permits uninterrupted customer service.	Low
Physical risks affecting Amadeus operations	Additionally, business continuity strategies have been implemented that can cope with the effects of local extreme weather events. A Business Resilience Program is designed as well to protect employees, assets and infrastructure; and to minimize potential impacts to acceptable limits. Damages to the assets due to changes in extreme weather patterns are minimal, given the nature of our business (i.e., not manufacturing, work-from-home practices, and rented offices). The most significant risk could be related to any event affecting the regular operations of our Data Center in Erding. This risk is mitigated by Amadeus' plan to transition to the cloud in the coming year. In any case, Amadeus has a property damages & business interruption insurance policy.	Low
Transition risks		
Regulatory risks - climate reporting related regulations	It is expected that more countries, specially in Europe, implement increasingly demanding and mandatory reporting on climate change. These new regulations are expected to apply to Amadeus and to upstream and downstream value chain. Nonetheless, the related risks seem apparently low according to internally established threshold, unless they become too complex and heterogeneous. In this respect, Amadeus is reinforcing its active dialogue with EU representatives and other stakeholders and implementing internal measures to comply with related requirements.	Low
Regulatory risks - regulations imposing charges and/or emission reductions	The implementation of regional emissions markets in a globally oriented industry like travel and tourism, and particularly aviation, inevitably could create competitive and political disruptions. These issues generate uncertainty and impose additional costs on the industry, particularly in the near to medium term. Although Amadeus has significant operations around the globe, no significant financial or reputational impact from these regulations is expected. The significant geographical diversification of Amadeus' business also mitigates this risk.	Moderate

Climate change-related risks	Description and management measures	Risk assessment
Reputational risks	Travelers and the general public are increasingly aware of climate change threats and expect environmentally responsible operations from companies. The number of users demanding sustainable travel options is increasing significantly, and social movements like "flygskam" (shame of flying) have expanded rapidly in certain markets. Additionally, companies are expected to comply with all industry environmental standards and monitor their environmental performance. Although Amadeus is not a B2C company and, consequently, its exposure to end users and consumers and public opinion is limited, the company's reputation and brand could be harmed if it fails, or is perceived to fail, to respond responsibly and effectively to climate change. Another potential risk arises from not being able to achieve its near-term and net-zero science-based targets, validated by the SBTi in 2024. Additionally, both the upstream and downstream value chain are particularly exposed to reputational risks. In this regard, Amadeus implemented its Environmental Management System (EMS) in 2009—which is subject to continuous improvement—and is participating in recognized sustainability indexes. These measures allow Amadeus to transparently report its environmental performance and progress toward its targets, and to identify best practices for continuous improvement.	Moderate
Technology risks	Technological improvements or innovations that support the transition to a low-carbon, energy-efficient economic system can significantly impact organizations. As a technology provider for the travel and tourism industry, it is essential for Amadeus to promote solutions that enhance the operational efficiency of its customers (for example, optimizing fuel consumption). For its part, if suppliers and customers are unable to develop desirable technology in the medium to long term, they could face the associated risks. Nevertheless, it is expected that Amadeus top suppliers and customers will invest in, develop, and/or implement low-carbon technology advances and solutions.	Moderate
Market risks	As an IT company operating in the travel industry, uninterrupted data processing activities are crucial to ensuring Amadeus daily operations. Disruptions to the energy supply can affect operations, depending on the magnitude and timing of the disruption. At Amadeus, data center efficient performance is important for managing costs and securing a reliable energy supply. Additionally, Amadeus' upstream operations could be exposed to the increased focus on energy efficiency and GHG emissions, requiring the company to anticipate requirements for their products and services and innovation to address the focus on GHG emissions and energy efficiency. Finally, Amadeus and its value chain must prioritize its own environmental performance to attract and/or retain the talent of younger generations.	High

Climate change-related opportunities for Amadeus are linked to the development of IT solutions that help to inform travelers about sustainable travel options and to help travel providers improve the environmental efficiency of their operations. In addition to their environmental impact, these solutions can increase customer conversion, loyalty and improve market reputation.

In this regard, Amadeus develops and fosters IT solutions that can help customers to reduce GHG emissions. The growing demand for products and services that help combat climate change generates business opportunities which could have a potential financial effect in Amadeus (financial performance and cash flows). See more information in section *Sustainability-related goals*, table *Technology developments*.

Type of opportunity	Solution/functionality	Description
New products and services	Display	Providing the traveler an estimation of the emissions released in a journey at the time of booking.
	Compare	Amadeus' solutions are able to compare emissions from different itineraries, using carbon calculators like the International Civil Aviation Organization (ICAO) or the Travel Impact Model from Travalyst.
	Reporting	Compiling emissions released in business trips by an organization.
	Offsetting	Including the possibility to offset carbon emissions released on a journey.
Competitive advantages	Amadeus Altéa Departure Control System (DCS) Flight Management (FM) module	Optimization of aircraft load distribution, helping also airlines to better estimate the fuel required in every departure.
	Amadeus Sky Suite	Facilitates airline network planning with sophisticated algorithms to estimate travel demand, helping to optimize the use of resources, including fuel and related emissions per passenger flown. The solution helps the airline decide where to fly, with what kind of aircraft and how often to optimize return and minimize emissions per passenger.
	Amadeus Airport Sequence Manager	Facilitating the implementation of Collaborative Decision Making (CDM) at airports, entailing reductions in economic costs, CO ₂ emissions, local pollution, noise per flight and increasing efficiency at airports and traveler satisfaction.
	Airport Cloud Use Service (ACUS)	ACUS enables agents to easily access any airline system they need to better serve passengers. It is now in place at more than 100 airports across the world.
	Hotel solutions	For example Delphi is a solution that can help hotels tackle food waste by providing enhanced communication and streamlined operations across departments, specifically focusing on accurate forecasting, real-time updates and management of Banquet Event Orders, and precise meal planning, thereby minimizing excess food delivery.

Amadeus has opted to exercise the phase-in allowance to omit the financial effects from material physical and transition risks and potential climate-related opportunities required in *E1-9-Anticipated financial effects from material physical and transition risks and potential climate-related opportunities*, given the complexity and uncertainty of the calculations of these financial effects.

ESRS 2 - IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities

To identify material climate change-related impacts, risks and opportunities, the following considerations have been taken in the Amadeus double materiality assessment⁵¹:

⁵¹ See section ESRS 2 IRO-1- Description of the process to identify and assess material impacts, risks and opportunities for further details.

- Assessment of GHG inventory. An inventory and screening of Amadeus scope 1, 2 and 3 emissions in accordance with the GHG Protocol standards and guidance⁵²;
- Amadeus Climate Change Risk & Opportunity qualitative Analysis, updated in 2024.

A further description of the climate change-related risk assessment is described below.

Risks and opportunities

In 2024, Amadeus updated the climate-related risk and opportunity analysis using the TCFD guidelines. The purpose of this exercise was to update and complement the previous qualitative assessment, using the most recent scenarios from the IPCC and the NGFS.

- Physical climate change-related risks. This analysis is based on scenarios Representative Concentration Pathways (RCP) and Shared Socioeconomic Pathway (SSP), of the IPCC, including, short- and long-term climate projections⁵³:
 - High and very high GHG emissions scenarios (RCP 8.5, SSP3-7.0 and SSP5-8.522).
 - The intermediate GHG emissions scenario (RCP 4.5 and SSP2-4.5).
 - The very low and low GHG emissions scenarios (RCP 2.6, SSP1-1.9 and SSP1-2.6).

Amadeus' assets and business activities that could be exposed to climate-related hazards have been screened, including value chain. As mentioned, official sources, such as an interactive climate atlas, have been used to evaluate physical risks⁵⁴. Amadeus has taken into consideration the short, medium and long term as defined by these sources⁵⁵.

Changes in variables such as mean temperature, days with temperatures above 40°C or precipitation patterns, among others, under both low- and high-emission scenarios, and their related effects (including impacts associated with increased energy costs due to rising temperatures, employee safety concerns, etc.) have been analyzed while identifying and assessing both acute and chronic physical risks. Additionally, public sources of information published by Amadeus' top vendors or sector-specific risk maps have been considered.

- To qualitatively analyze Amadeus exposure to transition risks along its own operation and/or its value chain, the orderly transition pathway, as defined by the NGFS scenarios, has been considered. This assumes that climate policies are introduced early and become gradually more stringent to limit global warming to below 1.5°C by 2050⁵⁶.

Policy and legal, reputational, technology and market risks on Amadeus own operations and its value chain have been qualitatively assessed, considering the potential impact in their business activities and likelihood in the near and/or medium term⁵⁷. In particular, public sources of information published by Amadeus' top vendors or sector-specific risk maps have been considered.

Following Amadeus' corporate risk methodology, each identified risk has been assessed according to its impact and probability. As a result, no Amadeus' assets have been identified as incompatible with, or requiring significant efforts to be compatible with the transition to a climate-neutral economy. Nevertheless, disruptions to the energy supply may have in the future a financial effect on

⁵² See GHG Protocol Corporate Standard (version 2004): <https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf> ; GHG Protocol Scope 2 Guidance: <https://ghgprotocol.org/sites/default/files/2023-03/Scope%20%20Guidance.pdf> ; Technical Guidance for calculation Scope 3 Emissions: https://ghgprotocol.org/sites/default/files/2023-03/Scope3_Calculation_Guidance_0%5B1%5D.pdf

⁵³ The Intergovernmental Panel on Climate Change establishes various scenarios of Representative Concentration Pathways (RCP) and Shared Socioeconomic Pathway (SSP). See more information at https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf

⁵⁴ For example, <https://climate.copernicus.eu/> and <https://interactive-atlas.ipcc.ch/>

⁵⁵ Near Term (2021-2040), Medium Term (2041-2060), Long Term (2081-2100).

⁵⁶ Further information is available at: https://www.ngfs.net/sites/default/files/media/2024/11/20/ngfs_climate_scenarios_technical_documentation.pdf

⁵⁷ Due to the nature of the activities carried out by Amadeus and the plan to move to the cloud, own assets do not seem to be exposed to transition related events.

operations, depending on the magnitude and timing of the disruption (financial performance and cash flows).

Furthermore, Amadeus participates and develops projects that lead to reductions in GHG emissions. The growing demand for products and services that help combat climate change generates business opportunities with potential financial effects in Amadeus (financial performance and cash flows).

The description of the identified climate change-related risks and opportunities has been included in section *ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model*, including the extent to which assets and business activities may be exposed to identified climate-related hazards. Additionally, a brief mention of sustainability risks, particularly those related to climate change, and the methods by which they have been identified and evaluated, has been included in the Amadeus consolidated annual accounts. For more details, please refer to note 22.5 Sustainability matters.

E1 - 2 - Policies related to climate change mitigation and adaptation

Policies in place to manage material impacts, risks and opportunities related to climate change mitigation and energy are listed in the table below:

Key policies - Climate change mitigation and energy

Environmental Policy - Climate change mitigation and energy	
Description and objectives	Through this policy, Amadeus formalizes its operating principles and commitments regarding environmental issues to continuously improve the environmental performance of Amadeus' own operations and those of its value chain: - Identify and evaluate Amadeus' own operations and value chain environmental impacts, risks and opportunities, including but not limited to the ones related to climate change. - Effectively manage material environmental impacts, risks and opportunities, particularly those related to energy, climate change mitigation and the direct and indirect releases of greenhouse gases. - Reduce emissions in line with the objectives of the Paris Agreement, at a rate compatible with the 1.5 degrees Celsius of maximum increase in temperatures, following SBTi guidance. - Promote energy efficiency measures. - Extend the use of renewable energy. - Analyze, quantify and improve, wherever possible, the environmental performance of Amadeus products and services. Foster and develop IT solutions that help to improve the environmental performance of the customers that use these solutions. - Collaborate with industry partners and public institutions in the achievement of common environmental goals for the travel industry as a whole. - Effectively transfer the principles contained in this Policy to relevant vendors, contractors and business partners.
Related material IROs	See section <i>ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance areas and to receive assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	The Policy is applicable to Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy. Some of the principles of the Policy, depending on the materiality of each case, extends to Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants and agents. Finally, the policy also applies to joint ventures subject to materiality considerations and Amadeus' level of participation and control in the specific joint venture.

Most senior level accountable for its implementation	The President and CEO of Amadeus assumes direct responsibility over sustainability topics and is the ultimate responsible for the definition and execution of the sustainability (ESG) strategy. The ESG Steering Committee is in charge of the approval of the Policy and acts as delegated body of the Executive Committee—that will act as final validator of decisions—for sustainability and, in particular, environmental matters. The Sustainability (ESG) Office is ultimately responsible for the definition of the Amadeus environmental strategy, environmental performance progress, consistency, and alignment to the ESG ambition and, particularly, environmental issues, across Amadeus, and continuous adaptation to trends and market requests, leveraging the ESG Steering Committee and the Executive Committee. The Group Environmental Officer and Head of Sustainability (ESG) Reporting, within the Sustainability (ESG) Office, is directly responsible for the measurement, monitoring, improving and setting of climate change-related targets, as well as the Amadeus environmental policy.
Third-party standards or initiatives	The Science Based Targets initiative (SBTi) Net-Zero Standard. Laws and regulations related to environmental sustainability.
Interests of key stakeholders	Silent stakeholders have been taken into consideration.
Availability	This Policy is available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-environmental-policy.pdf

Sustainability Policy - Climate change mitigation and energy

Description and objectives	The Sustainability Policy shows Amadeus' ESG ambition and commitment to sustainable development through ESG principles that govern the rest of the sustainability related policies. Particularly, the document formalizes Amadeus' commitment to foster environmental sustainability, including: • Taking responsibility for the environmental impact of Amadeus' operations and implementing initiatives to improve the environmental performance of the company. • Measuring the environmental impact generated by Amadeus, setting up action plans to reduce emissions and monitor progress, and promoting responsible practices among employees. • Analyzing and improving, wherever possible, the environmental performance of Amadeus' products and services, looking for sustainable innovation to generate long term environmental benefits. • Collaborating with industry partners and public institutions in the achievement of common environmental goals for the travel industry.
Related material IROs	See section <i>ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>
Process for monitoring	The Policy has been approved by the Board of Directors of Amadeus and the Audit Committee is responsible for supervising the compliance with internal policies related to Environmental, Social and Governance issues, including the Sustainability Policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	The ESG Steering Committee is the ESG governing body composed of senior executives to influence the direction of the Sustainability ambition and make related decisions. It acts as delegated body of the Executive Committee, that will act as final validator of decisions. The Sustainability Office oversees progress, consistency, and alignment to the ESG ambition across Amadeus and continuous adaptation to trends and market requests (including the development of ESG strategy, the implementation of strategic sustainability projects, sustainability reporting and authority over key sustainability decisions), leveraging the ESG Steering Committee and the Executive Committee.
Third-party standards or initiatives	Not applicable.
Interests of key stakeholders	To define the ESG Ambition, and consequently the Sustainability Policy, a bottom-up approach has been followed, involving Amadeus business units who had deep knowledge of affected stakeholders.
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/policies/amadeus-sustainability-policy-06-2024.pdf

Human Rights Policy - Climate change mitigation and energy

Description and objectives	The purpose of the Human Rights Policy is to reaffirm Amadeus' commitment to respect and promote human rights in our operations and supply chain. This policy embraces among other commitments to embed sustainability in all its activities and to foster environmental sustainability among its stakeholders. The Policy makes reference to Amadeus' Code of Ethics and Business Conduct and Environmental Policy as they include commitments and objectives related to the environment and establish guidelines and best practices to contribute to the fight against climate change, prevent pollution in production processes, promote the circular economy, the appropriate use of water resources and the protection of biodiversity and nature. See details about measures to provide and/or enable remedy for human rights impacts in section <i>ESRS 2 GOV-4 – Statement on due diligence</i>.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and receiving assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other nonfully owned Amadeus companies or joint venture that have agreed to be bound by this Policy Additionally, the Policy applies to eligible Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents.
Most senior level accountable for its implementation	The ESG Steering Committee is in charge of the approval of this Policy and acts as delegated body of the Executive Committee – that will act as final validator of decisions – for sustainability and, in particular, human rights matters. The Sustainability (ESG) Office and Sustainability (ESG) Steering Committee have the responsibility for adhering to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the Speak Up Channel and investigated by the Corporate Compliance department.
Third-party standards or initiatives	Main international benchmarks established by the United Nations. • United Nations Global Compact • The Universal Charter of Human Rights, which constitutes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the Covenant on Economic, Social and Cultural Rights • United Nations Guiding Principles (UNGPs) on Business and Human Rights • Organization for Economic Cooperation and Development's Guidelines for Multinational Enterprises • European Social Charter
Interests of key stakeholders	Through internal responsible experts at corporate level who had knowledge of interests of the stakeholders
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-human-rights-policy.pdf

E1 - 3 - Actions and resources in relation to climate change policies

The Amadeus Climate Transition Plan includes action plans for reducing the climate impacts and addressing emissions. As indicated, the Plan is aligned with the Paris Agreement's target of limiting global warming to 1.5 C above pre-industrial levels and promotes the Group's adaptation to a low-carbon economy.

Key actions - Climate change mitigation and energy

Helios project

Scope Amadeus S.A.S. offices in Nice

Time horizons	2023-2025
Description and outcomes	The goal of the Helios project is to reduce the energy consumption and increase the use of renewable energy in Amadeus' largest site, located in Nice. It started in 2023 driven by more than 50 volunteering employees led by Company management and consists on several actions: • Heating, ventilation and air-conditioning equipment replacement for increased efficiency. • Double-glazing window installation. • Roof insulation improvement in buildings where significant heat lost was identified through thermal imaging. • Transition to LED lighting in car parking. • Geostorage drilling works - ongoing - should result, upon completion, in a reduction of 65% of energy consumption for heating and air conditioning. With these measures in place, during 2024, 30 t of CO₂ emissions were avoided and more than 200 t of CO₂ emissions are estimated to be avoided by 2030.
Energy efficiency measures at office buildings	
Scope	Amadeus Group offices
Time horizons	2024-2030
Description and outcomes	Amadeus puts in place certain recommended actions as a result of energy audits at its office buildings, such as the replacement of light bulbs in Madrid office. Additionally, Amadeus has started the installation of presence sensors in specific offices and expects to cover 50% of the total space of Amadeus sites. This can help to improve the energy efficiency for the climate control of the spaces, with an estimated reduction of 8% in electricity consumption. With these and similar measures, in 2024, more than 120 t of CO₂ were avoided while by 2030, it is expected that approximately 700 t of CO₂ will be avoided.
Renewable energy	
Scope	Amadeus Group offices
Time horizons	Annual basis, from 2024
Description and outcomes	To meet its commitment to achieve an annual sourcing of 100% renewable electricity by 2030, Amadeus plans to: • Acquire Guarantees of Origin certifications of renewable energy or similar instruments, extending their use to cover all Amadeus offices. Amadeus has been using Guarantees of Origin of renewable energy for the electricity used in its Data Center in Germany since 2019. In 2024, the Data Center represented 61% of the total Amadeus electricity consumption. As Amadeus is moving to the cloud, the electricity consumption in the Data Center is expected to reduce significantly in the coming years. A roadmap for the purchase of renewable energy has been defined based on the type of certificates available in the countries where the offices are located, and prioritizing those with a higher electricity consumption. Some of Amadeus office buildings, like in Manila, London and San José, are already powered by renewable energy. • Where possible, increase the production of renewable electricity for self-consumption. For instance, we installed photovoltaic panels in our London office, which in 2024 generated 60,519 kWh. These actions are limited to a reduced number of buildings that Amadeus owns or where it has the rights or influence to act, out of its 100+ offices worldwide. Through these actions Amadeus will avoid 100% of its scope 2 emissions by 2030 (market-based).
Hybrid working	
Scope	Amadeus Group
Time horizons	From 2022 onwards
Description and outcomes	The implementation of the hybrid working model in 2022, that balances business needs with flexibility for employees to combine working from home and working from the office, has reduced Amadeus scope 3 emissions from commuting (category 7). It is expected that approximately 7,000 t of CO₂ will be avoided in 2030 considering both the growth Amadeus workforce and the adoption of cleaner technologies for passenger vehicles.
Supplier engagement	
Scope	Amadeus Group suppliers

Time horizons	2024-2050
Description and outcomes	To decarbonize Amadeus' supplier-related activities, that represent more than half of Amadeus scope 3 emissions, Amadeus engages with suppliers to ensure they set carbon emissions reduction targets aligned with Amadeus objectives and to demonstrate progress toward reaching them. Amadeus has classified its suppliers based on activity, location and spend; and identified those with more emissions. Amadeus has assessed whether they have established science-based targets or decarbonization plans approved. Based on this assessment, Amadeus is prioritizing the engagement with its top suppliers by emissions that do not have targets or plans to reduce their emissions, and Amadeus will be requiring them to commit to the SBTi. Within this stream of action, Amadeus is reviewing its supplier procurement processes and will be promoting the use of renewable energy by our suppliers, favoring those that have a higher percentage of renewable energy supply. With these actions Amadeus expects to reduce more than 19,000 t of CO₂eq from its scope 3 categories 1 and 2.

In addition to the above mentioned initiatives, and particularly linked to the material opportunity identified through the double materiality assessment, it is important to highlight the Green IT initiative, launched in 2022. This program aims at making green software principles a cornerstone of Amadeus engineering practices in order to optimize the energy and carbon efficiency of its software and IT operations. The four axes of the Green IT efforts are:

- Raise awareness on sustainability within the Amadeus engineering community,
- Engage Amadeus' workforce with concrete, actionable green software guidelines throughout the development lifecycle,
- Implement tools and metrics to measure the carbon emissions of Amadeus' software and the maturity of our green IT practices and
- Encourage and promote actions toward the optimization of Amadeus' efficiency.

Among other highlights of Green IT in 2024, the productization of the proof of concept of the Amadeus Software Carbon Measurement Engine (CARMEN) could be mentioned. This engine based on the Software Carbon Intensity specification from the Green Software Foundation will enable Amadeus to capture the carbon efficiency of its software applications based on real-time telemetry and datasets about the energy consumption and carbon intensity of the electricity grid.

Additionally, CO₂ impact measurement of Amadeus' IT solutions is now integrated in Amadeus' FinOps dashboards for every applications in the Cloud and in its Software Delivery Lifecycle. Furthermore, the second edition of Green IT campaign to encourage and promote energy-efficiency optimization projects has been launched.

Regarding the resources allocated, each of these actions individually do not surpass the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements.

Additionally, as indicated in section *E1 - 1- Transition plan for climate change mitigation*, as of the date of publication of this report, Amadeus has carried out an initial study to evaluate the investments required to meet the targets of the Transition Plan and its alignment with the criteria established in the Commission Delegated Regulation 2021/2139. The volatility of prices for both renewable energy and offsets, as well as the relatively uncertainty regarding the validation of the market instruments to use, make this exercise difficult and with significant margins of errors.

Finally, another strategic initiative that has implications in Amadeus emissions inventory is the move to the cloud. As Amadeus moves to the cloud via its strategic partnership with Microsoft, the data center in Germany will be reducing its operations and therefore its energy consumption progressively in the coming years.

The move to the cloud has implications in Amadeus emissions inventory, namely a reduction in Amadeus' scope 1 and 2 emissions and an increase of scope 3 emissions.

E1 - 4 - Targets related to climate change mitigation and adaptation

In line with its objective of understanding the environmental impact of its operations and value chain and reducing it as much as possible, Amadeus has set near-term and long-term GHG emissions reduction targets. The SBTi validated these targets in 2024, classifying Amadeus scope 1 and 2 target ambition as in line with a 1.5°C trajectory.

Amadeus science-based targets are as follows: ESRS E1-4 p.34

- Near-term targets:
 - Amadeus commits to reduce absolute scope 1 and 2 GHG emissions 42%, at least, by 2030 from a 2022 base year.
 - Amadeus commits to increase active annual sourcing of renewable electricity from 63% in 2022 to 100% by 2030.
 - Amadeus commits to reduce absolute scope 3 GHG emissions 25% by 2030 from a 2022 base year.
 - Amadeus commits that 25% of its suppliers by emissions covering purchased goods and services, will have science-based targets by 2028.
- Long-term targets – Net-Zero by 2050:
 - Amadeus commits to reduce absolute scopes 1, 2 and 3 GHG emissions 90% by 2050 from a 2022 base year.

The methodology used to track performance toward scope 2 targets is the market-based approach⁵⁸.

In light of global trends and events impacting travel and tourism, particularly those affecting Amadeus operations—such as the COVID-19 health crisis and geopolitical and security events—Amadeus has selected 2022 as the base year. The reason was to mitigate the influence of external factors that could distort Amadeus' carbon footprint and to select representative figures.

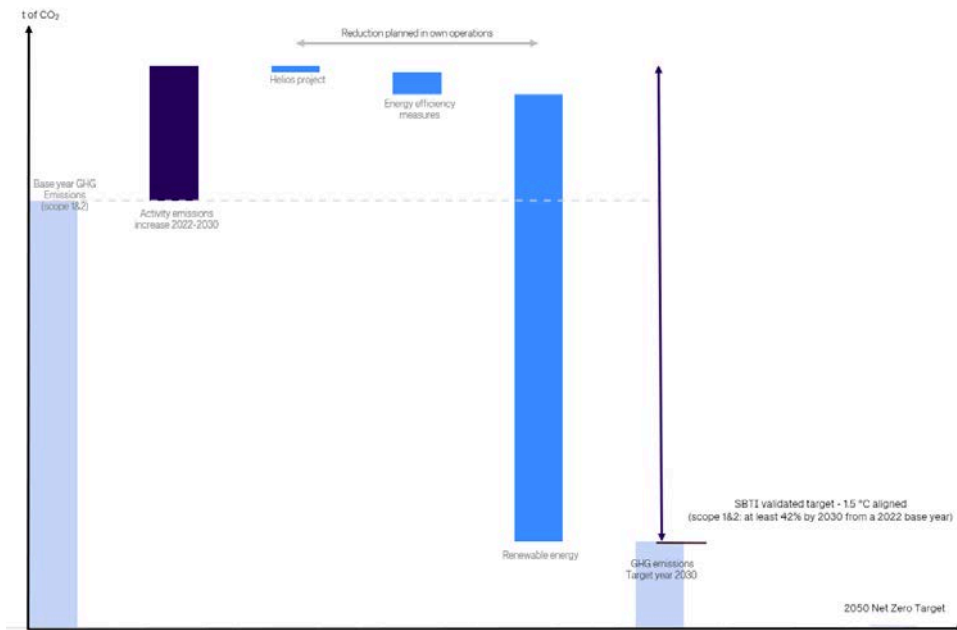
The targets boundary includes the emissions of the Group. The consolidation approach used to calculate GHG emissions is operational control.

After reviewing the SBTi guide for the "information and communication technology (ICT)" sector, it has been concluded that the sectoral criterion ICT is not mandatory for Amadeus. Consequently, no sectoral decarbonization pathway has been used. Anyway, to define the targets, Amadeus has considered global climate agreements and regulations set around the world to limit global warming to 1.5° C⁵⁹. Additionally, in the process of setting targets, the Group has considered future developments and organization changes (e.g. an increase in its workforce, the rise in expenses, the impact of climate change in each climatic region where Amadeus has offices, the move to the cloud, etc.).

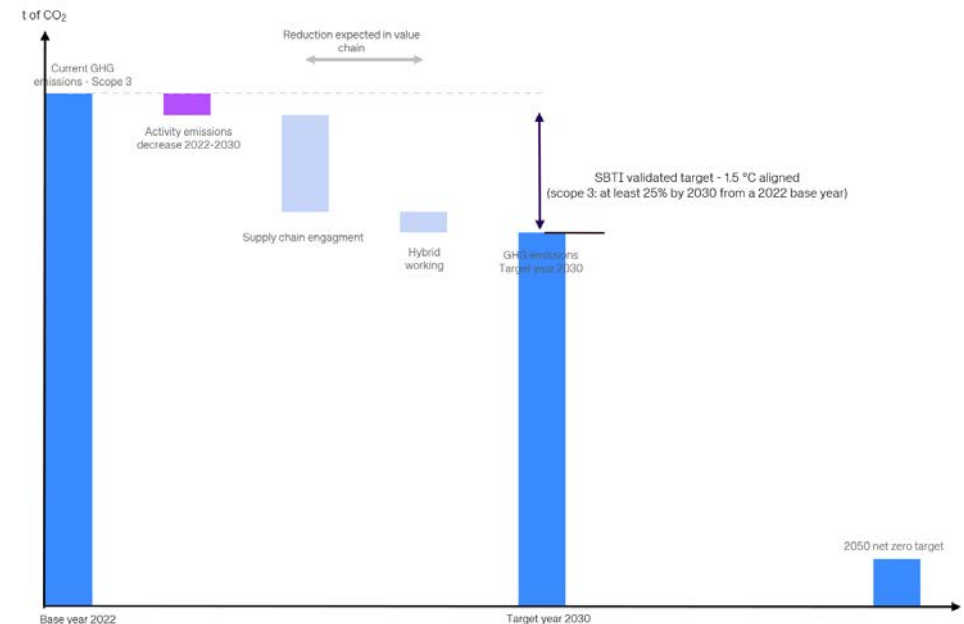
In relation to the expected decarbonization levers and their overall quantitative contributions to achieve the GHG emission reduction targets, as described in section *E1 - 3 - Actions and resources in relation to climate change policies*:

⁵⁸ Amadeus scope 2 GHG emissions have been calculated using both the market-based and location-based approach following the "GHG Protocol Scope 2 Guidance", as disclosed in section *E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions*.

⁵⁹ The Paris Agreement (2015), European Green Deal the EU's, etc



- For scope 1 and 2, energy efficiency measures have been taken and planned for office buildings in order to reduce energy consumption and, consequently, emissions. Additionally, for scope 2, a roadmap has been defined for the purchase of renewable electricity, broadening its use to all electricity used by Amadeus by 2030 as committed.



- For scope 3 emissions, Amadeus is acting principally on those from supplier-related activities that represent more than half of its scope 3 (mainly category 1). A study has been carried out to classify suppliers, identify those with the highest emissions and assess whether they have established science-based targets or have decarbonization plans approved. Based on this study, Amadeus is prioritizing the engagement with its top suppliers by emissions that do not currently have decarbonization plans.

Climate scenarios and shifts in patterns have been analyzed to identify relevant environmental, societal, technological, market, and policy-related developments, and to determine decarbonization levers. For example, in determining reductions in scope 3, category 7, the anticipated increase in the adoption of electric vehicles (EVs) and other cleaner technologies have been considered to calculate greenhouse gas emissions associated with employees' commuting to and from their workplaces.

Offsets are not counted as progress toward Amadeus' science-based targets. Nevertheless, the company currently purchases Certified Emissions Reductions (CERs) from UN Clean Development Mechanism (CDM) projects for two purposes: (i) to compensate for the emissions from business travel, and (ii) to compensate for the scope 1 and 2 emissions that could not be reduced to meet the progressive path to carbon neutrality by 2025. See more information in section *E1 - 7 - GHG removals and GHG mitigation projects financed through carbon credits*.

The above-mentioned Amadeus' short-term goal of carbon neutrality by 2025 follows a formal commitment made in 2017 to carbon neutral growth by joining the UN Climate Neutral Now Pledge. This target covers scope 1 and 2 emissions of Amadeus, with an operational control approach and, as mentioned, is independent from and additional to Amadeus' science-based targets validated by the SBTi.

E1 - 5 - Energy consumption and mix

Energy consumption and mix

The energy consumption of Amadeus own operations relates to its owned and leased offices, as well as its Data Center in Germany. Amadeus measures and monitors energy consumption, among other items, through its Environmental Management System (EMS)⁶⁰, used also to identify exemplary practices and continuously improve its environmental performance.

The EMS includes the reporting of Amadeus' operations environmental impact. Amadeus has more than 100 offices around the world, many of which are small, so it becomes inefficient to measure and report the impact of all of them in a direct manner. Therefore, Amadeus has adopted a pragmatic approach by which direct measurements of impacts in its 14 largest sites are reported (which represent 68% of total Amadeus workforce worldwide), and then make an estimation of the impact of the remaining sites, based on the average consumption factors per employee of the 14 sites.

It is important to note that the Amadeus Data Center in Germany is included in the direct reporting, considering that it is by far the largest energy consumer, representing over 60% of the total electricity consumption at Amadeus. Additionally, some offices are shared with other tenants.

The consumption data collected through the EMS comes primarily from energy provider invoices, meter readings and in certain cases the information provided by landlords.

The Amadeus sites included in the direct reporting are:

- Bad Homburg, Germany
- Bangkok, Thailand
- Bengaluru, India
- Erding, Germany
- London, United Kingdom
- Madrid, Spain

⁶⁰ The Amadeus' Environmental Management System measures the impact of own operations considering five elements: energy, CO₂ emissions, paper used, water and waste generated

- Manila, Philippines
- Miami, US
- Nice, France
- Paris, France
- Portsmouth, US
- San José, Costa Rica
- Singapore, Singapore
- Sydney, Australia

Energy consumption from fossil fuels and nuclear sources was split at a country level based on the latest electricity supply data from the International Energy Agency (IEA), that is, 2023 data for OECD countries and 2022 data for other countries and the world average.

The consumption or purchased energy from renewable sources includes the consumption covered by the Guarantees of Origin of renewable energy purchased by Amadeus. This is based on the market-based methodology scope 2 emissions calculation.

The consumption of self-generated energy from renewable sources primarily relates to photovoltaic panels installed at certain offices. The reported figure is considering primary data.

In 2024, Amadeus energy consumption was 111,552 MWh. This consumption comes from the use of electricity, heating and cooling in Amadeus own operations, that is, in its owned and rented office buildings and data center in Germany.

Energy consumption and mix	2024
Total fossil energy consumption (MWh) ESRS E1-5 p. 37 a	24,663.6
Share of fossil sources in total energy consumption (%)	22 %
Consumption from nuclear sources (MWh) ESRS E1-5 p. 37 b	10,490.1
Share of consumption from nuclear sources in total energy consumption (%)	9 %
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh) ESRS E1-5 p. 37 c i	10,708.6
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh) ESRS E1-5 p. 37 c ii	65,629.7
The consumption of self-generated non-fuel renewable energy (MWh) ESRS E1-5 p. 37 c iii	60.6
Total renewable energy consumption (MWh) ESRS E1-5 p. 37 c	76,398.9
Share of renewable sources in total energy consumption (%)	68 %
Total energy consumption (MWh)	111,552.5
Renewable energy production (MWh)	60.6
Non-renewable energy production (MWh)	0

Amadeus has introduced and is planning to introduce measures to improve efficiency in the use of resources. See section *E1 - 3 - Actions and resources in relation to climate change policies* for further information.

As previously mentioned, to be consistent with its climate-related targets, Amadeus complements the implementation of energy efficiency measures with other initiatives, such as the use of Guarantees of Origin of renewable energy (GOs). Amadeus has purchased GOs since 2019 for the

electricity used at its Data Center in Germany, and has defined a roadmap to progressively extend the use of GOs or similar market instruments to cover the electricity used at all its offices, in line with Amadeus target to progressively increase the annual sourcing of renewable electricity to 100% by 2030.

Energy intensity based on net revenue (high climate impact sectors) ESRS E1-5 p. 40-43

Considering the activities carried out by the Group, Amadeus has started to conduct an assessment to identify those associated with activities in high climate impact sectors.

In this regard, in accordance with the definition of high climate impact sectors provided Annex II to the Commission Delegated Regulation (EU) supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards⁶¹, Amadeus' work has consisted in making an assessment of the activities that could be listed in sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council (as defined in Commission Delegated Regulation (EU) 2022/128819) to determine the energy intensity from Amadeus' activities in high climate impact sectors. In this regard, Amadeus plans to further deepen this assessment in future exercises, especially considering recently acquired companies.

E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions

As referred earlier, Amadeus measures and monitors its environmental performance through its EMS. To manage and report emissions, Amadeus follows the GHG Protocol Corporate Standard (version 2024). Additionally, the company has considered the principles and requirements of the GHG Protocol Scope 2 Guidance. Scope 3 emissions have been identified following the guidelines outlined in the GHG Protocol Corporate Standard and GHG Protocol Corporate Value Chain (scope 3) Accounting and Reporting Standard, which establishes fifteen categories of scope 3 emissions, offering a structured framework to analyze, comprehend, and report on activities within the company's value chain.

Amadeus science-based targets have been built upon its emissions inventory. In addition to the GHG Protocol standards, the SBTi guidelines have been followed for emissions accounting and target setting. The methodology used for Amadeus emissions inventory has been reviewed by the SBTi during the target validation process (see further clarification below).

Scope	Emissions calculation methodology
Scope 1 Direct emissions at Amadeus associated with natural gas, diesel and refrigerant gases.	Data from 14 of Amadeus' main sites representing 68% of Amadeus workforce has been collected, and the remaining 32% has been estimated to cover the totality in the reporting. Emission factors from the latest version of DEFRA (UK Government GHG Conversion Factors for Company Reporting. Department for Business, Energy & Industrial Strategy) are used to calculate these emissions. The most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO ₂ eq emissions of non-CO ₂ gases have been used.

⁶¹ Available in https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302772

Scope 2

Indirect emissions associated to the use of electricity at Amadeus office buildings worldwide and at the Data Center in Germany.

Location-based methodology

Similarly as for scope 1, data has been collected from Amadeus' 14 main sites. A ratio kWh/FTE has been calculated based on the FTEs in those sites, and the electricity consumption of the remaining 32% has been estimated applying this ratio.

Amadeus applies the emission factors per country from the International Energy Agency source (IEA 2024 Emission Factors) for the sites monitored in the EMS, and the world emission factor for the rest of the sites estimated.

Market-based methodology

Market-based scope 2 emissions differ from location-based emissions in that: (i) sites 100% covered by the use of Guarantees of Origin of renewable energy or equivalent instruments have been excluded (in 2024, these sites are Amadeus offices and data center in Erding, and the offices in London and Manila); (ii) residual mix emission factors in the countries where this information is available have been applied (sources: AIB in Europe and Green-e for the US). Otherwise, the emission factors from the International Energy Agency (IEA 2024 Emission Factors) have been applied instead.

The most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO₂eq emissions of non-CO₂ gases have been used.

The seven greenhouse gases have been included when relevant; Amadeus emissions inventory considers CO₂, CH₄, N₂O and HFCs, while PFC, SF₆ and NF₃ gases are excluded as they are insignificant due to Amadeus business activity.

Scope 3

Scope 3 -Category 1.

Purchased goods and services

Emissions from purchased or acquired goods and services that are necessary for the execution of the activity.

These emissions are calculated by applying the emissions factors of EXIOBASE to the annual purchasing data. The emissions from Microsoft Azure cloud services and Microsoft 365 are provided directly by the provider. Amadeus plans to increase the direct data collection from its top providers to gain further visibility and be able to act on the decarbonization of the supply chain.

Scope 3 -Category 2.

Capital goods

Emissions associated with the life cycle of the capital goods purchased.

For the calculation of this category Amadeus has considered its Capital Expenditures in the reporting year and applied the EXIOBASE emission factors.

Scope 3 -Category 3.

Fuel and energy-related activities

Emissions from the production, transport and distribution of the purchased fuel and electricity.

DEFRA emission factors for natural gas and diesel have been used. The Well to Tank (WtT) emission factors have been applied, calculating the factors in a number of countries with most significant consumption, and applying the ratio WtT emissions/scope 2 emissions to the rest of the countries.

Scope 3 -Category 4.

Upstream transportation and distribution

Emissions associated with transport and distribution services of purchased products, parcels and machinery

Purchasing data related to the sector identified as "Supporting and auxiliary transport activities; activities of travel agencies (63)" have been considered. Additionally, the last-mile emissions from other supplier purchases have been calculated and added.

Scope 3 -Category 5.

Waste generated in operations

Emissions from waste management.

The waste generated in Amadeus' operations is calculated using both actual and estimated amounts of waste.

Based on Amadeus' waste data, the residual waste generation is extrapolated to the entire workforce. Amadeus uses DEFRA emission factors to calculate the emissions derived from waste management.

Scope 3 -Category 6.

Business travel

Emissions from air and rail corporate trips and overnights of employees.

The emissions from air business travel and rail come from Amadeus' corporate tool Cytric – using ICAO methodology for flight emissions and Greentripper for rail.

Emissions from hotels are calculated separately and not included in the mandatory reporting, as per the following the GHG Protocol's optional guidance.

Scope 3 -Category 7. Employee commuting Emissions from transportation of employees between their homes and their worksites.	Several variables for the calculation of commuting emissions have been considered: employee attendance to the office (1-5 days per week); percentage of employees that declared a private car; average distance from employees' residence to Amadeus premises—an assumption was made based on People & Culture data to allocate transportation allowance in our main site, and extrapolated to other locations—and applied an average emission factor for passenger cars from the European Environment Agency.
Scope 3 -Category 15. Investments Emissions associated with Amadeus investments for which Amadeus has no operational control	Amadeus has estimated the emissions from investments based on the average data method. For the calculation, the total value of the joint ventures and associates (€5.2 M) and the share owned by Amadeus - <i>note 10. Investments Accounted for using the equity method</i> of Amadeus consolidated annual accounts- have been considered. As the Quantis tool used in previous years has been decommissioned, Amadeus has based on historical results for this calculation.

The following scope 3 categories are not applicable to the Company's operations:

- Category 8. Upstream leased assets. Since Amadeus has operational control over its facilities, refrigerant gas emissions have been included in scope 1.
- Category 9. Downstream transportation. As the company does not distribute products sold but rather provides a service (software usage), this category is not applicable.
- Category 10. Processing of sold products. Since Amadeus' primary focus is on providing services rather than manufacturing and selling physical products, there are no tangible products whose life cycle needs to be assessed in terms of emissions. Therefore, this category is not applicable.
- Category 11. Use of sold products. According to the SBTi Corporate Net-Zero Standard, the emissions from software (i.e., the energy consumption of computers or other electronic devices due to the use of software) are indirect use-phase emissions. Therefore, the emissions from the use of Amadeus software are excluded from the emissions inventory.
- Category 12. End-of-life treatment of sold products. As Amadeus does not sell physical products and primarily provide services, this category is not applicable because there are no tangible products whose end-of-life needs to be assessed in terms of emissions.
- Category 13. Downstream leased assets. Amadeus does not lease assets to third parties.
- Category 14. Franchises. Since Amadeus does not have franchises in its business model and is not involved in franchise operations, this category is not relevant.

The inventory boundary includes the emissions from the Amadeus IT Group S.A. and all its subsidiaries. The consolidation approach used to calculate GHG emissions is operational control. No significant changes in the definition of what constitutes a reporting undertaking and its value chain have been introduced in 2024.

Figures have been calculated considering the direct reporting of the sites included in the EMS plus the estimation of the rest of the sites. As described in section *E1 - 5 - Energy consumption and mix*, the EMS collects measures from the Amadeus largest sites, representing 68% of total Amadeus workforce worldwide. The estimation is based on the average consumption reported by the EMS sites. Figures are in t of CO₂ unless otherwise indicated.

In 2024, Amadeus revisited its CO₂ emissions inventory with the support of external consultants, and following the GHG Protocol standards and the guidance of the Science Based Target initiative (SBTi). As indicated previously, the SBTi validated Amadeus' near-term and net-zero science-based targets.

In 2024, the absolute scope 1 emissions decreased by 12% from 2023 to 2024. The scope 2 location-based increased by 5% while the increase of scope 2 market-based was 3% during the same period. The increase is mainly due to the growth in Amadeus workforce (12% increase in

average FTEs versus previous year) and m² of offices (6% increase), although efficiency measures have been taken, which prevented further emissions.

In relation to market-based scope 2 emissions, the contractual instruments used by Amadeus are Guarantees of Origin of renewable energy. These are only used if a Guarantee of Origin/cancellation statement is in hand or a signed letter of intent assuring the arrival of such a statement is present at the time of reporting. As explained in the section above, Amadeus is purchasing Guarantees of Origin of renewable energy for the electricity used at its Data Center in Germany since 2019, and is planning to progressively extend their use to cover the electricity consumed at all Amadeus offices by 2030. In 2024, Amadeus offices in London and Manila were also using equivalent instruments for purchase of renewable energy. The share of Guarantees of Origin or equivalent contractual instruments in 2024 was 63% of the electricity consumption.

As indicated, Amadeus is committed to reducing its absolute emissions from scope 1 and 2, and will continue to invest in renewable energy and energy efficiency measures at its offices.

Absolute scope 3 emissions increased by 5.6% from 2023 to 2024.

The decrease in scope 3 category 7 (employee commuting) is fundamentally due to the use of a different emissions factor for passenger cars. While in 2023 an emission factor of 0.165 kgCO₂e/km from DEFRA was used, the factor was updated to 0.125 kgCO₂e/km from the European Environmental Agency.

The increase in category 15 (investments) is due to the change in the calculation now based on the total value of the joint ventures and associates and the share owned by Amadeus - *note 10. Investments Accounted for using the equity method* of Amadeus consolidated annual accounts - instead of using the figure for additions to equity-accounted investees as in 2023.

1.15% of the total GHG scope 3 has been calculated using primary data.

See further information in table below, considering that:

- The table does not include information on target year 2025 as Amadeus has validated its science-based targets with the SBTi for the target years 2030 (near term) and 2050 (net zero).
- Amadeus' science-based targets were set for the total scope 3 emissions - not by scope 3 category -. Regarding scope 2 emissions, the market-based approach was considered for the targets.
- Comparative data can be found in the Annex to this report. In this way, the company responds to the requirements of Spanish Law 11/2018 and provides comparable information on its carbon footprint. See *Annex - Additional information on Sustainability (includes Non-Financial Information Statement)*, section *Greenhouse gas emissions*.

Figures in tCO ₂ eq	Retrospective				Milestones and target years			
	Base year 2022 ¹	2023	2024	% 2024/ 2023	2025	2030	2050	Annual % target / Base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions ESRS E1-6 p. 44 a AR 39, ESRS E1-6 p. 48 a AR 43	2,148		1,827			—	—	—
Scope 1 GHG emissions from regulated emission trading schemes (%) ESRS E1-6 p. 48 b AR 44	0		0					
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions ESRS E1-6 p. 44 b AR 39, ESRS E1-6 p. 49 a, 52 a AR 45, AR 47	33,099		37,192			—	—	—
Gross market-based Scope 2 GHG emissions ESRS E1-6 p. 44 b AR 39, ESRS E1-6 p. 49 b, 52 b AR 45, AR 47	11,378		13,677			—	—	—
Scope 1 & 2 emissions (market-based)	13,526		15,504			7,845	1,353	5 %
Scope 3 GHG emissions								
Total Gross indirect (Scope 3) GHG emissions ESRS E1-6 p. 44 c AR 39, ESRS E1-6 p. 51 AR 46	173,588		193,961			130,191	17,359	3 %
1 Purchased goods and services	141,412		139,948			—	—	—
2 Capital goods	7,215		21,492			—	—	—
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	7,317		8,684			—	—	—
4 Upstream transportation and distribution	52		43			—	—	—
5 Waste generated in operations	122		50			—	—	—
6 Business traveling	10,531		15,707			—	—	—
7 Employee commuting	6,498		5,852			—	—	—
8 Upstream leased assets	0		0			—	—	—
9 Downstream transportation	0		0			—	—	—
10 Processing of sold products	0		0			—	—	—
11 Use of sold products	0		0			—	—	—
12 End-of-life treatment of sold products	0		0			—	—	—
13 Downstream leased assets	0		0			—	—	—
14 Franchises	0		0			—	—	—
15 Investments	441		2,185			—	—	—

Total GHG emissions						
Total GHG emissions (location-based) ESRS E1-6 p. 44 d AR 39, ESRS E1-6 p. 44, 52 a AR 47	208,835		232,980		—	—
Total GHG emissions (market-based) ESRS E1-6 p. 44 d AR 39, ESRS E1-6 p. 44, 52 b AR 47	187,114		209,465		131,262	17,359 4 %

¹ 2022 figures have been restated as Amadeus revisited its CO₂ emissions inventory calculations in order to validate its carbon emissions reduction targets with SBTi. Scope 1 emissions increased by 44% and scope 3 emissions decreased by 24%, mainly due to the removal of category 8 (refrigerant gases emissions accounted under scope 1) and category 11 (downstream emissions related to the use of software are outside the minimum boundary and should be separated from the mandatory reporting).

The columns of the table are the following:

- Base year 2022: value of the metric in the base year against which progress towards the target is measured.
- 2024: the value for the metric in the current year.
- 2030: value of target for the metric in year 2030.
- 2050: value of target for the metric in year 2050.
- Annual % target / base year: average annual emission reduction figure, considering 2022 as base year and 2030 as the target year.

No biogenic emissions of CO₂ from the combustion or bio-degradation of biomass separately from the scope 1, 2 or 3 have been emitted by Amadeus.

As previously indicated, there are no investees such as associates, joint ventures, subsidiaries that have not been fully consolidated, as well as contractual arrangements that are joint agreements not structured through an entity, for which Amadeus has operational control. Consequently, scope 1 and 2 have not been separately disclosed from the consolidated accounting group and investees.

Concerning GHG emissions per net revenue, in 2024 it was 37.93 tCO₂eq per € million (location-based) and 34.11 tCO₂eq per € million (market-based).

GHG intensity per net revenue

2024

Total GHG emissions (location-based) per net revenue (tCO ₂ eq/€ million) ESRS E1-6 p. 53 AR 53, 54	37.93
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/€ million) ESRS E1-6 p. 53 AR 53, 54	34.11
Net revenue (€ million)	6,141.7

GHG intensity based on net revenue has been calculated as gross scope 1, scope 2 (both market-based and location-based), and gross scope 3 emissions divided by reported net revenue in € million, as reported in the consolidated annual accounts (see note 12 Revenue).^{ESRS E1-6 p. 55}

E1 - 7 - GHG removals and GHG mitigation projects financed through carbon credits

Amadeus has purchased carbon credits in the recent years and is planning to do so in the short term for two purposes: (i) to compensate for the emissions from business travel, and (ii) to compensate for the scope 1 and 2 emissions that could not be reduced to meet its progressive path to carbon neutrality by 2025⁶². The company is committed to purchasing only carbon credits from projects that are verified by a third party and consider recognized quality standards. Consequently, Amadeus purchases Certified Emissions Reductions (CERs) from the United Nations' Clean Development Mechanism (CDM) projects.

The CDM is one of the market-based mechanisms defined in the Kyoto Protocol. It facilitates investment in emission reduction projects in exchange for Certified Emission Reductions (CERs) by authorized third parties. One CER unit is equivalent to the reduction of 1 t of CO₂. The United Nations market-based mechanisms defined in the Kyoto Protocol stimulate sustainable development, address emissions in a cost-effective way and facilitate contribution by the private sector to emission reduction efforts.

Certified Emissions Reduction purchases ESRS E1-7 p. 56

2024

Total (tCO ₂ e)	27,779
Share from removal projects (%)	0 %
Share from reduction projects (%)	100 %
Clean Development Mechanism (%)	100 %
Share from projects within the EU (%)	0 %
Share of carbon credits qualified as corresponding adjustments under Article 6 of the Paris Agreement (%)	0 %

In 2024, a total of 27,779 t of CO₂e were cancelled through the purchase of carbon credits. As indicated above, the 100% are verified against recognized quality standards.

Amadeus has not undertaken specific actions to remove or store GHG emissions.

Nevertheless, in the long term, Amadeus has committed to neutralize residual emissions (10% of base year emissions) to reach net zero. In compliance with the SBTi guidelines, the neutralization of these emissions will be done through carbon removal and storage projects. This will be done outside Amadeus value chain.

⁶² It is important to note that these offsets are not counted as progress toward Amadeus' science-based targets.

In 2025 Amadeus plans to offset the scope 1 and 2 GHG emissions that cannot be avoided. The estimated amount, based on 2024 figures, is 15,000 t of CO₂e. In addition to that, Amadeus offsets the emissions from business travel, which the Group estimates in 15,000 t of CO₂e for 2025 based on 2024 results.

The estimated total amount of carbon credits planned to be canceled in the future, for year 2025, is 30,000 t of CO₂e, out of which 0 t of CO₂e are based on existing contractual agreements.

Carbon credits planned to be cancelled in the future	Amount until December 31, 2025
Total (tCO ₂ e)	30,000

E1 - 8 - Internal carbon pricing

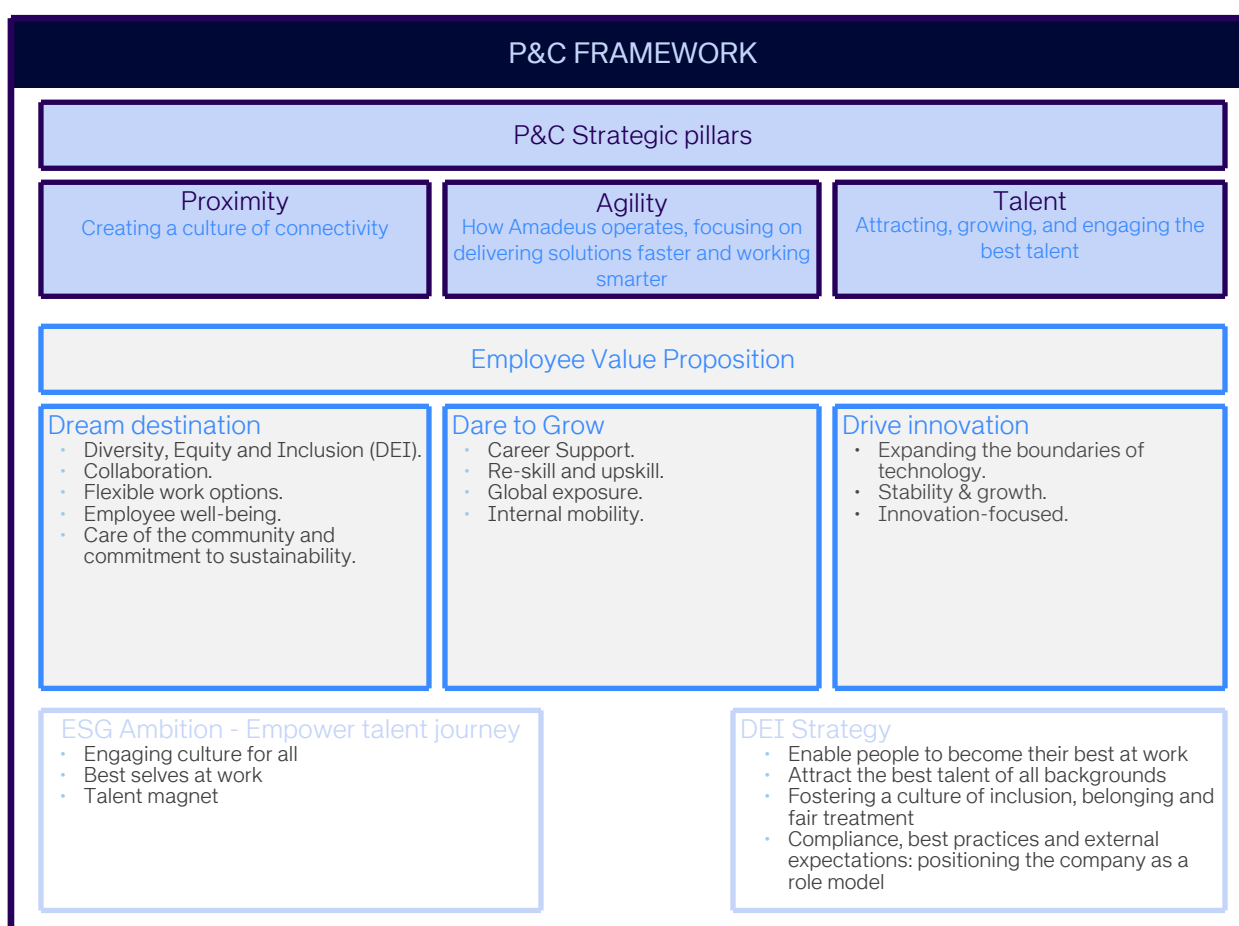
Amadeus does not apply internal carbon pricing schemes in its business.

3. SOCIAL INFORMATION

ESRS S1 - OWN WORKFORCE

Amadeus' people are essential to its success. Effectively managing Amadeus own workforce-related impacts, risks and opportunities is the base to maintain and reinforce a diverse, inclusive, safe, and appealing workplace for employees, and to continue Amadeus being a great place to work.

This is why the company has reinvented its People & Culture strategy based on three key pillars (proximity, agility, and talent)⁶³, undertaken an update to its Employee Value Proposition (EVP), approved the Diversity, Equity and Inclusion (DEI) strategy, and includes the Empower Talent Journey as one of the four pivotal commitments that Amadeus has pledged to uphold within the ESG Ambition.



ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model

Amadeus generates positive impacts in its employees by creating secure employment. The Company promotes beneficial working conditions for its employees—exceeding the minimum obligations stipulated by law—through the implementation of adequate wages, the improvement of employee's well-being and health, career and competencies development, and an inclusive work environment,

⁶³ People & Culture (P&C) is the human resources area in Amadeus.

particularly encouraging the inclusion and equal opportunities of women in tech and the promotion of equal pay for work of equal value, among others⁶⁴.

The Group is also making important efforts to help employees in combining work and private life, achieving healthy work-life balance.

Main opportunities and risks are derived from strengthening a robust brand identity, alongside managing talent attraction and diversity and inclusion, respectively. These elements contribute to the effective recruitment of new employees, lowering turnover rates, and enhancing innovation processes, which in turn could have a potential financial effect on the company (financial position, performance, cash flows, access to finance or cost of capital).

ESRS - S1 - Own workforce

Impacts, risks and opportunities

Sub-topics	Sub-sub topics	Time horizons ¹	Scope
Working conditions	Secure employment, collective bargaining and adequate wages	-	Own operations
			
	Working time, work-life balance and health and safety	-	
			
Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value, and diversity	-	
			
	Training and skills development, including talent attraction and retention	Medium/long-term	
	  		

 Positive impact  Risk  Opportunity

¹All identified impacts are actual. Consequently, time horizons are not applicable.

In the double materiality assessment process, people with particular needs have been considered (for instance, those located in particular risk contexts). As a consequence, it is important to highlight that Amadeus has not identified material negative impacts or risks related to child labor or forced or compulsory labor, nor any related to individual incidents. ESRS S1.SBM-3 p. 14 f, ESRS S1.SBM-3 p. 14 g

No material impacts on Amadeus workforce have been identified arising from the Amadeus Climate Transition Plan either. Nevertheless, actions and targets to embed sustainability in the overall company strategy and to inform employees about it have been implemented; the latter resulting in upskilling Amadeus staff and overall reinforcement of sustainability commitments⁶⁵.

Finally, it is important to note that Amadeus workforce is comprised of Amadeus staff (also called employees) and external resources (non-employees), in accordance with the Amadeus Labor Reporting Policy⁶⁶. The external resources are categorized into five distinct groups, among which non-employees encompass those classified as workforce contractors, service, and interim. Certain policies, actions, metrics, and targets described in this section only apply to employees.

⁶⁴ Amadeus activities that result in the positive impacts are described in the sections related to taking actions on material impacts on own workforce (S1-4).

⁶⁵ See section S1-4 - Taking action on material IROs own workforce - Secure employment, collective bargaining and adequate wages, S1-4 - Taking action on material IROs on own workforce - Training and skills developments, including talent attraction and retention.

⁶⁶ This Policy describes the methodology to obtain and calculate own workforce figures as well.

S1-2 Processes for engaging with own workforce and workers' representatives about impacts

Amadeus fosters a culture of open, transparent and inclusive communication with employees. As included in the EVP, collaboration, i.e., fostering a culture of respect for opinions within an inclusive and globally diverse team, is key.

Focusing on employees, the goal is to help them connect what they do individually with the company vision and strategy, to be more engaged in their day-to-day work, and to build a sense of belonging to one global team.

Through a variety of channels, taking into account market size and careful communication channels selection, Amadeus offers accessible resources and information to its employees, including a monthly internal newsletter; an internal social network; regular town halls and staff briefings with Amadeus leaders; and two annual global events, "Amadeus Live". Furthermore, in some countries⁶⁷ employees have set up employee resource groups (ERG'S), sponsored by Management, and aimed at creating a safe space for employees to connect, collaborate and develop (for instance, Amadeus Women's Network, Women in Tech, Amadeus Proud (LGBTQIA+), Fenix Network (long term illness, etc) with which the DEI team connects regularly.

Additionally, Amadeus measures engagement at the organizational level with the aim of better understanding employees views and enabling the Company to be agile in discussing and acting on what works best and what needs improvement. Human resources are allocated to properly conduct the engagement process.

Since 2023, the frequency of the engagement surveys has increased from once to three times a year, with the aim of gaining more visibility and improving the engagement process.

The survey introduces questions on global transversal and key topics (well-being, equal opportunity, sustainability, flexibility, stress management, employer brand, talent development, cross-collaboration, etc.). Furthermore, to facilitate a comprehensive understanding of the questions, Amadeus has developed a series of explanatory videos, available to participants.

The Chief of P&C at Amadeus has the responsibility for such engagement as part of its role. The results of the engagement surveys are shared with the Executive Committee, the ESG Steering Committee, and the people managers with at least one direct report, among others. They are also shared within teams on the Amadeus intranet.

In the third wave of 2024 engagement survey, Amadeus' employee Net Promoter Score (eNPS) was an average of 54 (on a scale of -100 to +100), up from 51 in the last wave of 2024.

In response to the engagement surveys results in 2024, Amadeus continues to focus on fostering a psychologically safe work environment in which employees feel heard and recognized for their work. This was achieved through, among others, leadership training at workshops held around our global network that focused on active listening and transformational feedback.

Furthermore, in various countries, such as Spain and Portugal, the practice of active listening is applied. This approach encompasses the establishment of reciprocal communication processes, ensuring that each employee has the capability to obtain the necessary information and express their opinions freely. To support this, specific actions related to communication and feedback are planned and executed throughout the year.

Additionally, it is important to mention that the Company has established a European Works Council called "Amadeus European Employee Council" ("AEEC") in Madrid. This Council provides a platform for the provision of information and consultation on significant subjects of a transnational nature. The agreement, most recently negotiated in 2023, covers employees in Amadeus companies located

⁶⁷ Greece, NORAM, Sweden, Norway, Denmark, among others.

in member states of the European Union and stated signatories of the European Economic Area, and non-members of the EU including Switzerland and sets out the provision of consultation and information sharing on transnational matters affecting employees⁶⁸.

Employees are represented at this Council, by active Amadeus employees who have been elected or appointed under the relevant due process in their country. These elected individuals are a group of labor representatives giving voice to worker concerns and interests, they are informed on a range of topics presented by management⁶⁹.

Finally, local and joint works council or employees committees including health and safety committee at various office locations (for instance, Spain, Portugal, Colombia, Germany, South Africa, among others) help safeguard that the employees perspectives are heard. The safety representatives/employee representatives meet several times per year and are invited to participate in discussions when necessary.

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

Employees are encouraged to safely submit an inquiry or to report, anonymously if desired, suspected issues that may contravene laws, regulations or business practices, or that may constitute unethical conduct that could result in a breach of the Code of Ethics and Business Conduct—including those related to human rights violations, discrimination or harassment—through the Speak Up Channel. See details in *G1-1 Business Conduct and Corporate Culture*, including protection against retaliation for individuals that use the channel. *ESRS S1-3 p. 32 c*

Additionally, if individuals are unsure about whether they have information regarding something they should report, or if they would like to speak to someone before submitting a report, they can submit an inquiry through the Speak Up Channel or they may speak to a member of People and Culture team.

Finally, reporting possible violations is also available via telephone. During the process, individuals are guided to describe the related incident in detail.

The Audit Committee is responsible for supervising the functioning of the Speak Up Channel. See more related information in section *ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies related to business conduct and G1-1 - Business conduct policies and corporate culture*.

Secure employment, collective bargaining and adequate wages⁷⁰

S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages

The first EVP pillar includes the Amadeus' commitment to take care of the employees so they can be their best at work. This aligns to the ESG Ambition' strategic line "Engaging culture for all", and its long-term goal "Provide a flexible, healthy and inclusive employee experience, ensuring fair treatment, rewards and benefits" (see section *ESRS 2 SBM-1- Strategy, business model and value chain - Sustainability-related goals*). The DEI strategy also contributes to it, as it aims to cultivate a culture of belonging and inclusion for everyone, striving to become a global reference in inclusive employee experience by ensuring fair treatment, well-being, and equitable rewards.

⁶⁸ In some countries, Amadeus employees may be covered by any sector or industry agreements for example in Brazil, Senegal, Sweden, Norway, etc

⁶⁹ In some countries -for instance, Spain, France-, the related-work council organizes specific activities to improve work life balance and promote well-being among employees (trips, sport activities, etc).

⁷⁰ For reporting purposes and to avoid duplication, the policies and actions related to the IROs identified in these sub-sub-topics have been grouped together, given their linkage and contribution to all of them. This includes positive impacts linked to the creation of secure employment and beneficial working conditions for its employees —exceeding the minimum obligations stipulated by law—, including the implementation of adequate wages.

With reference to internal rules, Amadeus approach to working conditions is covered in the People Policy, the Code of Ethics and Business Conduct (CEBC), and the Human Rights Policy. Human and labor rights are integrated as fundamental principles for protecting the dignity and the rights of each member of the Amadeus community.

Key Policies - Secure employment, collective bargaining, adequate wages

Human Rights Policy - Secure employment, collective bargaining, adequate wages¹

Description and objectives
ESRS S1-1 p. 20

The purpose of the Human Rights Policy is to reaffirm Amadeus' commitment to respect and promote human rights in its operations and supply chain.

This policy embraces among other commitments (see details about measures to provide and/or enable remedy for human rights impacts in section GOV-4 – *Statement on due diligence*):

- Amadeus promotes fair and favorable working conditions by adhering to the applicable laws and regulations of the countries and regions in which it operates with specific regulation in anti-slavery and human trafficking. The Group employs zero tolerance towards child labor, abuse and exploitation throughout its operations and supply chain and seeks to ensure adequate remediation insofar as such maltreatment is discovered. It is important to mention that under slavery and/or human trafficking are also included the concept of forced labor (i.e. involuntary work coerced by threatening behavior); the sale and exploitation of children; arranging or enabling the trafficking of persons; or any other practice that involves depriving one person of their liberty or freedom in order to exploit them for personal or commercial gain. *ESRS S1-1 p. 22*
- Freedom of association/collective bargaining: complying with the International Labour Organisation (ILO) Conventions with respect to freedom of association and trade union rights, fully acknowledging the right to organize and the right of unions to represent and negotiate on behalf of the employees, without prejudice to existing local legislation.
- Fair wages: remunerating employees in line with the labor market best practices and local legislation. Remuneration policies are always established based on equitable remuneration.

Related material IROs

See section *ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model*

Process for monitoring

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

Scope or its exclusions

Amadeus IT Group S.A. and all Amadeus Group companies where the company owns or controls, directly or indirectly, most of the shares; as well as any other nonfully owned Amadeus companies or joint venture that have agreed to be bound by this Policy. Additionally, the Policy applies to eligible Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents.

Most senior level accountable for its implementation

The ESG Steering Committee is in charge of the approval of this Policy and acts as delegated body of the Executive Committee – that will act as final validator of decisions – for sustainability and, in particular, human rights matters.

The Sustainability (ESG) Office and Sustainability (ESG) Steering Committee have the responsibility for adhering to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the Speak Up Channel and investigated by the Corporate Compliance department.

Third-party standards or initiatives	Main international benchmarks established by the United Nations: ESRS S1-1 p. 21 AR 12 • United Nations Global Compact. • The Universal Charter of Human Rights, which constitutes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the Covenant on Economic, Social and Cultural Rights. • Fundamental rights in the eight core conventions of the International Labor Law (ILO) as set out in the Declaration on Fundamental Principles and Rights at Work. • United Nations Guiding Principles (UNGPs) on Business and Human Rights. • Organization for Economic Cooperation and Development's Guidelines for Multinational Enterprises • European Social Charter
Interests of key stakeholders	Through internal responsible experts at corporate level who had knowledge of interests of the stakeholders
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-human-rights-policy.pdf

¹See more information about the Human Rights commitments and the due diligence process, including general approach in relation to measures to provide and/or enable remedy for human rights impacts in section ESRS 2 GOV-4 – *Statement on due diligence*.

People Policy - Secure employment, collective bargaining, adequate wages

Description and objectives	The Amadeus' People Policy outlines its key commitments to fostering a workplace where every employee feels valued, respected, supported, and empowered. In particular: • Secure Employment. The company offers secure and stable employment, aligned with best practices and local labor laws, and to foster a dependable work environment. Amadeus promotes that all employment contracts are clear, compliant with local legal standards, and cover at least essential terms such as compensation, benefits and role responsibilities • Freedom of association and collective bargaining. Amadeus supports employees' rights to freedom of association in accordance with national law and/or practice. Additionally, Amadeus also encourages other employee resource groups where employees may participate on several topics. The company further respects the right of employees to engage in collective bargaining, where this is the wish of a majority of employees within an appropriate bargaining unit and as provided for in national law and/or practice. • Adequate Wages. Amadeus provides attractive remuneration packages, covering the pillars of a competitive rewards offer - salary, bonus, equity and benefits - while promoting equitable compensation across all roles, that meet or exceed local minimum wage requirements.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and to receive assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	Senior Vice President P&C at Amadeus.
Third-party standards or initiatives	Law applicable in each territory or country and international practices, as set out in relevant intentional instruments.
Interests of key stakeholders	Key labor related topics have been considered while defining the policy.
Availability	Available internally through the intranet.

Code of Ethics and Business Conduct (CEBC) - Secure employment, collective bargaining, adequate wages

Description and objectives	The Amadeus CEBC sets forth the commitment of the company to conduct business pursuant to the highest ethical standards and its strict compliance with all appropriate and applicable laws and regulations. It covers several areas, including “Our People” among others. In this regard, Amadeus respects and promotes international human rights, and expects its providers, third party contractors and business partners to uphold internationally-recognized standards regarding working conditions and the dignified treatment of employees.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Audit Committee is in charge of supervising the breaches of internal codes of ethics.
Scope or its exclusions	All employees of the Amadeus Group, including the members of the Executive Committee and VP/Directors, and forms part of their employment relationship with the Group or the relevant Amadeus Company. In addition to direct employees of the Amadeus Group, this also extends to agents, scholarship holders, subcontracted personnel, and, in general, all people who work or render their services in any Amadeus Group Company. In the case of subcontracted people who render their services for an Amadeus Group Company through another company, Amadeus will endeavor to have such entities expressly agree to principles consistent with the CEBC.
Most senior level accountable for its implementation	Corporate Compliance and Investigations
Third-party standards or initiatives	International human rights, internationally-recognized standards regarding working conditions and the dignified treatment of employees, and highest ethical standards
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	It is available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-code-of-ethics-and-business-conduct.pdf

Finally, it is important to mention that these commitments are reinforced in the collective agreements, where applicable. Furthermore, the European Works Council agreement⁷¹ applies to all Amadeus companies located in member states of the European Union and states signatories of the European Economic Area and non-members of the European Union including Switzerland, and it does not exclude any European country where an Amadeus Company with majority shareholding exists.

S1-4 - Taking action on material IROs own workforce - Secure employment, collective bargaining and adequate wages

Amadeus develops several ongoing actions with the primary purpose of delivering positive impact and beneficial working conditions to its own workforce (expand protection for workers, etc.), achieving the commitments and principles included in the policies put in place (see section above).

Through these initiatives, Amadeus also supports the development of the Sustainable Development Goal 8 - *Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all*.

In this regard, some of the key ones are described in table below.

⁷¹ It is recognized as a negotiated agreement under Spanish law 10/1997 of April 24, as amended by the Act 10/2011 of 19 May 2011 implementing the Council Directive 2009/38/EC of 6 May 2009.

Key actions - Secure employment, collective bargaining and adequate wages

Time horizons	These actions are underway. Each is executed on a regular basis, (mostly annually). Consequently, particular time horizons or end-date to complete each key action are not applicable since they are recurrent.
Tracking the effectiveness	Information about how Amadeus tracks and assesses the effectiveness of the actions and initiatives in delivering outcomes have been included in section <i>Sustainability-related goals (ESRS 2 SBM-1- Strategy, business model and value chain</i>
Resources allocated	Regarding the resources allocated, each of these actions do not surpass the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements. The P&C team is responsible for the implementation of these actions. ¹

¹ Bear in mind that, to this effect, only management costs (salaries, benefits and other overheads of P&C staff dedicated to put in place these actions) is considered.

Monitoring applicable legal regulations

Scope	Amadeus Group
Description	Depending on the geography in which the Company operates, different internal measures are implemented to ensure that the Group stays aware of applicable legislative changes, labor practices, and other external factors. For instance, in Benelux, India, and Israel, a third-party provider specializing in labor compliance provides the related information to safeguard that working conditions are kept up to date with changes in local legislation or practice. The government website that lists all the legislative changes is followed in several areas (Armenia, Malaysia, etc.). In other countries such as France, Germany, Greece, Bulgaria, Italy, and the offices in the Middle East and Africa region, among others, the teams responsible are subscribed to the official journal or specific industry associations and receive updates on the law. The objective and expected outcomes are to comply with local applicable legislation.

Annual salary review process

Scope	Employees - Amadeus Group
Description	Amadeus regularly benchmarks salaries against leading companies to make sure the Company remains competitive and equitable, and employees receive adequate salaries, according to their roles and the local situation. The Group follows local pay equity legislation and reporting in the countries of operation. The current compensation policies and practices include global guidelines that are applied during the annual salary review process. The guidelines include principles on paying equitably and looking at performance and competencies to support pay decisions.

Pay & Benefits - more than just a payslip

Scope	Employees at Amadeus Group
Description	The company makes significant contributions in both fixed and variable compensation. Depending on local conditions, additional key benefits may include private medical coverage, life and disability insurance, transport and lunch allowance, subsidized cafeteria purchases, retirement/pension plans, travel insurance for both professional and personal trips aboard (when accompanying employees on leisure trips, direct family members are also covered), summer camp subsidies, employee assistance program, among others ² . Amadeus offers a cross border work from anywhere policy, of up to thirty days, to our employees (see more information in section S1-4 - <i>Taking action on material impacts on own workforce - Working time, work-life balance and health and safety</i>). This way, Amadeus employees receive more than a paycheck, improving their health and quality of life.

²All employees may benefit from global business travel insurance, international SOS (emergency assistance, global health and security provider), and the medical health insurance.

Global Share Purchase Plan

Scope	Most employees where share offering is compliant with local legislation
Description	Possibility to invest in Amadeus shares and then receive additional free shares, with extended options for some employee groups. Amadeus makes the employees part of its success and reinforces retention.

Relocation packages	
Scope	Employees at Amadeus Group
Description	Amadeus has international mobility programs and policies to support employees, with comprehensive relocation packages. As an example of this, Amadeus provides selected employees with support for relocating to a new residence .
ESG metrics link to the bonus scheme	
Scope	Employees at Amadeus Group
Description	The Amadeus Performance Plan (APP) is an annual incentive scheme designed to strengthen the alignment between business strategy and compensation. For the bonus payable in 2025, five of these targets are related to Amadeus performance in sustainability. They account for 12% of the total APP. The Group rewards employees for sustainable behavior, through integrating ESG into the bonus to potentially accelerate the company's overall sustainability agenda and align employee behavior, actions and efforts towards the attainment of the company's ESG objectives. See sections GOV-3-Integration of sustainability-related performance in incentive schemes for more information and <i>ESRS 2 - GOV-3 - E1 - Integration of sustainability-related performance of incentive schemes</i> .
Buy back program	
Scope	Employees at Amadeus Group (except for Dubai, where will be the next to deploy the process-).
Description	Amadeus gives the possibility to employees to buy back their end-of-lifecycle devices, reducing landfill. Terms and conditions are defined in the specific documentation & guidelines. This program is fully in line with the sustainability device lifecycle management.
Active listening	
Scope	Employees at Amadeus (Spain and Portugal)
Description	Bidirectional communication processes to safeguard employees may access the information they need and raise their voice. Specific communication and feedback actions are planned in advance throughout the year.
Human Rights assessment	
Scope	Amadeus' own operations and value chain
Description	In 2023, Amadeus worked with a third party consultancy to start conducting a human rights global saliency assessment. The assessment sought to identify potential human rights risks within Amadeus' own operations and value chain which the Group should prioritize to minimize any impacts. This way, the Group safeguards compliance with the commitments incorporated in the Human Rights Policy. As part of this work, the Company continues to work in the human rights due diligence process to ensure total compliance with the new legislation, the Corporate Sustainability Due Diligence Directive (CSDDD) (see section GOV-4- <i>Statement on due diligence</i> for more information).

S1-5 - Targets related to managing material IROs - Secure employment, collective bargaining and adequate wages

Amadeus is already generating positive impacts in terms of secure employment creation and working conditions among employees (including collective bargaining and adequate wages), aligned to its commitments (see *S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages*).

The objective of the Group is to continuing generating positive impacts, exceeding the minimum obligations stipulated at local level, given the global presence of Amadeus in many different countries where the common practices and regulations vary significantly.

S1-6 - Characteristics of the undertaking's employees

Headquartered in Spain, Amadeus is present in more than 190 countries across continents with over 20,643 employees (headcount) as of December 31, 2024^{72,73}, of which:

- 37.9% are women and 62.1% are men⁷⁴.
- 99.0% are permanent while 1.0% temporary.
- 96.1% have a full-time contract and 3.9% have a part-time one.
- At the end of 2024 the number of employees was 10.8% higher compared to 2023.
- In terms of FTEs, the total as of December 31, 2024 was 20,163.74⁷⁵.

Gender	Number of employees by gender. as of December 31, 2024 (headcount) ¹
Male	12,813
Female	7,829
Other	1
Non reported	0
Total employees	20,643

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcount as of the end of the reporting period.

Number of employees by gender and type of contract, as of December 31, 2024 (headcount) ¹				
Female	Male	Other	Not disclosed	Total
Number of employees				
7,829	12,813	1	0	20,643
Number of permanent employees ²				
7,742	12,702	1	0	20,445
Number of temporary employees ³				
87	111	0	0	198
Number of non-guaranteed hours employees ⁴				
0	0	0	0	0
Number of full-time employees ⁵				
7,250	12,589	1	0	19,840
Number of part-time employees ⁶				
579	224	0	0	803

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcount as of the end of the reporting period.

² Person has a direct employment contract with Amadeus without a pre-determined period of employment and is paid by Amadeus on a monthly basis.

³ Person has a direct employment contract with Amadeus with a pre-determined period of employment and is paid by Amadeus on a monthly basis.

⁴ No non-guaranteed hours employees are employed.

⁵ A full-time employee is an employee whose working hours per week, month, or year are defined according to national legislation and practice regarding working time.

⁶ A part-time employee is an employee whose working hours per week, month, or year are less than 'full-time' as defined in footnote 5.

⁷² Amadeus calculates some indicators using the average of employees across the period as the denominator. This is why in the figures at December 31, 2024, and in average across the period are reported in tables below.

⁷³ To safeguard that Amadeus Group companies report labor resources on a consistent basis and that there is a homogeneous understanding of terminology across sites, the Company has approved the Labour Reporting Policy. In this Policy, both Amadeus staff categories and external resources categories are defined. Additionally, the methodology to obtain and calculate figures is also described.

⁷⁴ One employee with gender "Other".

⁷⁵ Data extracted from the Group's ordinary system (MDM), including all permanent and temporary employees, full and part time of Amadeus IT Group in controlled companies. FTEs as of the end of the reporting period.

In average across 2024 (Headcount) ¹				
Female	Male	Other	Not disclosed	Total
Number of employees				
7,490.5	12,130.5	1.0	0.0	19,622.0
Number of permanent employees ²				
7,399.5	12,025.0	1.0	0.0	19,425.5
Number of temporary employees ³				
91.0	105.5	0.0	0.0	196.5
Number of non-guaranteed hours employees ⁴				
0.0	0.0	0.0	0.0	0.0
Number of full-time employees ⁵				
6,916.5	11,907.5	1.0	0.0	18,825.0
Number of part-time employees ⁶				
574.0	223.0	0.0	0.0	797.0

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. The average headcount is obtained by adding the starting and ending headcount and dividing over 2.

² Person has a direct employment contract with Amadeus without a pre-determined period of employment and is paid by Amadeus on a monthly basis.

³ Person has a direct employment contract with Amadeus with a pre-determined period of employment and is paid by Amadeus on a monthly basis.

⁴ No non-guaranteed hours employees are employed.

⁵ A full-time employee is an employee whose working hours per week, month, or year are defined according to national legislation and practice regarding working time.

⁶ A part-time employee is an employee whose working hours per week, month, or year are less than 'full-time' as defined in footnote 6.

Figures about Amadeus employees are reported in the Amadeus consolidated annual accounts, Note 22.3 *Employee distribution*.

During 2024, there has been a total of 1,327 employees who have left Amadeus, of which 478 women (corresponding to 36.0%), compared to 849 men (64.0%), and 0 others.

As of December 31, 2024

Total number of employees who have left the company ¹	1,327
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¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies, terminated voluntarily or involuntarily during the reporting period.

For its part, the turnover rate has been 6.8%. This low rate reflects Amadeus' excellent performance within the framework of its commitment to human capital and labor rights.

As of December 31, 2024

Turnover ratio ¹	6.8 %
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¹ The employee turnover rate is calculated as the number of employees who have left Amadeus (see table above) relative to the average headcount for the period.

Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies,

S1-7 - Characteristics of non-employees in the undertaking's own workforce

As of December 31, 2024, the number of non-employees (FTE) in Amadeus was 1,428.4.

A brief description of the types of employees and non-employees in Amadeus have been included in section *ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model*. Particularly, in Amadeus, external resources are categorized into five distinct groups, among which non-employees encompass those classified as workforce contractors, service, and interim.

As of December 31, 2024 (FTE)

Number of non-employees	1,428.4
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Data has been extracted from the Group's ordinary system (MDM), including all permanent and temporary employees, full and part time of Amadeus IT Group in controlled companies. FTEs as of the end of the reporting period.

S1-8 - Collective bargaining coverage and social dialogue

An overall population of 40.2% worldwide is covered by collective agreements, however at most of Amadeus' European sites like Madrid (Spain), Nice (France) or Erding (Germany) the percentage of workforce covered reaches almost 100%.

To calculate the percentage of employees covered by collective agreement, the following formula has been used:

$$(\text{Number of employees covered by collective agreement} / \text{Number of employees}) * 100$$

As of December, 31, 2024 ¹

Coverage Rate	Collective Bargaining Coverage		Social dialogue
	Employees – EEA (European Economic Area)	Employees – Non-EEA	Workplace representation (EEA only)
0-19%	Bulgaria, Netherlands	United State, India, United Kingdom, Philippines, Thailand, Singapore, Turkey, Ukraine, Colombia, United Arab Emirates	Netherlands, Belgium, Bulgaria
20-39%	—	—	—
40-59%	—	—	—
60-79%	Germany	Australia	—
80-100%	France, Spain	—	France, Spain, Germany, Italy, Poland, Sweden

¹Data obtained manually from each region where Amadeus operates and consolidated by P&C at Amadeus.

For calculating this information, the EEA countries in which Amadeus operates have been identified and considered.

In relation to the existence of any agreement with employees for representation by European Works Council, see section *S1-2 Processes for engaging with own workforce and workers' representatives about impacts*, containing further details.

S1-10 - Adequate wages⁷⁶

All Amadeus' employees in European countries are paid an adequate wage in line with Directive (EU) 2022/2041, and 100% of employees in non-European countries are paid an adequate wage in line with applicable national benchmarks.

The company incorporates national benchmarks when determining wages for employees, to safeguard they receive an adequate wage.

In this sense, Amadeus makes sure that its employees receive adequate and competitive wages by adhering to official regulations and standards in each country where it has employees.

To verify this, the company conducts thorough research to find the minimum wages in each country. These minimum wages are then compared with the salaries recorded in the Group's ordinary system (Workday). This meticulous process, run at least annually.

S1-17 - Incidents, complaints and severe human rights impacts

As indicated in section *Amadeus Speak Up channel and investigations* and *S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns*, employees are encouraged to safely submit an inquiry or to report, anonymously if desired, suspected issues that may contravene laws, regulations or business practices, or that may constitute unethical conduct that could result in a breach of the CEBC—including those related to human rights violations, discrimination or harassment.

In particular, during 2024:

- a) Amadeus received 40 communications of discrimination, including harassment, of which 28 were admitted for analysis. Out of the analyzed complaints, 16 were filed through the Speak Up Channel and 12 were reported to P&C. ESRS S1-17 p. 103 a
- b) 19 complaints were reported by the own workforce (with an additional 9 complaints submitted anonymously). No complaints (0) related to working conditions. Additionally, excluding those already reported in (a) above, neither other additional complaints (0) related to equal treatment and opportunities for all were received. Furthermore, no complaints (0) were reported to the National Contact Point for the OECD Multinational Enterprise.
- c) No cases (0) of severe human rights incidents (e.g., forced labor, human trafficking, or child labor) were identified. ESRS S1-17 p. 104 a

There has not been fines, penalties and compensation for damages as a result of the complaints disclosed above.

Working time, work-life balance and health and safety^{77,78}

S1-1 Policies related to own workforce - Working time, work-life balance and health and safety

The first EVP pillar is focused on fostering a healthy work-life balance among employees (flexible work options, well-being, etc), and, as a consequence, reinforces positive impacts. Amadeus offers

⁷⁶ The disclosure on whether employees are paid an adequate wage is determined using the lowest wage for the lowest pay category, and includes fixed additional payments that are provided to employees. The lowest wage has been considered separately for each country in which the Group has operations.

⁷⁷ Generally, Amadeus manages at the local level IROs related to working time, work-life balance and health. This is essential to safeguard they are adequately addressed, considering the contextual situations. To produce this report, information from Amadeus sites in Spain, France and India has been gathered, accounted by 51.7% of Amadeus headcount.

⁷⁸ For reporting purposes and to avoid duplication, the policies and actions related to the IROs identified in these sub-sub-topics have been grouped together, given their linkage and contribution to all of them. This includes positive impacts linked to the improvement of employee's well-being and health through the implementation of measures, and those related to Amadeus' efforts to help employees in combining work and private life, achieving healthy work-life balance.

flexible work options, including hybrid, remote and in-office work schedules. Additionally, the Group is committed to supporting its employees so they can be their best at work.

This also inspires the ESG Ambition, strategic line “Engaging culture for all”, and its long term goal “Provide a flexible, healthy and inclusive employee experience, ensuring fair treatment, rewards and benefits” (see section *ESRS 2 SBM-1- Strategy, business model and value chain - Sustainability-related goals*). For its part, the DEI strategy aims, among others, to cultivate a culture of belonging and inclusion for everyone, striving to become a reference in inclusive employee experience by promoting fair treatment, well-being, and equitable rewards

These commitments are also included in Amadeus global organizational policies.

Key Policies - Working time, work-life balance and health and safety *ESRS S1-1 p. 23*

Health & Safety Group Corporate Policy

Description and objectives	This Policy demonstrates Amadeus commitment to promoting a work environment where activities are carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of employees, contractors, authorized visitors, and anyone else who may be affected by operations. To ensure that, the policy underscores the significance of each Amadeus entity developing and endorsing its own health and safety policies, programs, and procedures.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The monitoring process is carried out at the local level. This safeguards that specific regional requirements and conditions are taken into account effectively, as requested by the Health & Safety Group Corporate Policy.
Scope or its exclusions	All companies within the Amadeus Group.
Most senior level accountable for its implementation	P&C
Third-party standards or initiatives	Local requirements regarding Health and Safety.
Interests of key stakeholders	In its development, requests from employees, channeled by local P&C representatives, have been considered.
Availability	Available internally through the intranet.

People Policy - Working time, work-life balance and health and safety

Description and objectives	The Amadeus’ People Policy outlines its key commitments to fostering a workplace where every employee feels valued, respected, supported, and empowered. In particular: • Working Time. Amadeus establishes fair working hours that respect employees’ rights to rest and recreation in alignment with local laws. The company maintains work schedules that comply with national regulations, promoting a balanced approach to work hours and rest periods respecting all the rights of workers as stated in the applicable rules and conventions. • Work-life Balance. Amadeus maintains a healthy work-life balance through flexible working options and respecting employees’ right to disconnect outside working hours, according to the specific internal policies currently in place. Its philosophy of everyday flexibility allows employees and teams to determine the patterns of work, collaboration and connection. • Health, Safety and Well-being. Amadeus promotes an environment where health, safety and well-being are promoted for employees across sites. The company is committed to fostering health, safety and well-being practices consistent with local regulations and other internal policies and rules. It is also dedicated to implementing workplace accident prevention actions and measures.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>

Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and to receive assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	Senior Vice President P&C at Amadeus.
Third-party standards or initiatives	Law applicable in each territory or country and international practices, as set out in relevant intentional instruments.
Interests of key stakeholders	Key labor related topics have been considered while defining the policy.
Availability	Available internally through the intranet.

Sustainability Policy - Working time, work-life balance and health and safety

Description and objectives	The Sustainability Policy shows Amadeus' ESG ambition and commitment to sustainable development through ESG principles that govern the rest of the sustainability related policies. In particular, this policy includes the commitment to promoting a flexible, healthy, and inclusive employee experience and reduce and remove, when possible, risks to the health, safety and welfare.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Policy has been approved by the Board of Directors of Amadeus and the Audit Committee is responsible for supervising the compliance with internal policies related to Environmental, Social and Governance issues, including the Sustainability Policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	The ESG Steering Committee is a ESG governing body comprised by senior executives to influence the direction of the Sustainability ambition and make regular decisions. It acts as delegated body of the Executive Committee, that will act as final validator of decisions. The Sustainability Office oversees progress, consistency, and alignment to the ESG ambition across Amadeus and continuous adaptation to trends and market requests (including the development of ESG strategy, the implementation of strategic sustainability projects, sustainability reporting and authority over key sustainability decisions), leveraging the ESG Steering Committee and the Executive Committee.
Third-party standards or initiatives	Internationally recognized standards regarding working conditions and highly ethical standards.
Interests of key stakeholders	To define the ESG Ambition, and consequently the Sustainability Policy, a bottom-up approach has been followed, involving Amadeus business units who had deep knowledge of affected stakeholders.
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/policies/amadeus-sustainability-policy-06-2024.pdf

Code of Ethics and Business Conduct (CEBC) - Working time, work-life balance and health and safety

Description and objectives	The Amadeus CEBC sets forth the commitment of the company to conduct business pursuant to the highest ethical standards and its strict compliance with appropriate and applicable laws and regulations. It covers several areas, including "Our People" among others. In this regard, the CEBC shows the Amadeus commitment to helping all employees find a healthy work-life balance.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>

Process for monitoring	The Audit Committee is in charge of supervising the breaches of internal codes of ethics.
Scope or its exclusions	Employees of the Amadeus Group, including the members of the Executive Committee and VP/Directors, and forms part of their employment relationship with the Group or the relevant Amadeus Company. In addition to direct employees of the Amadeus Group, this also extends to agents, scholarship holders, subcontracted personnel, and, in general, all people who work or render their services in any Amadeus Group Company. In the case of subcontracted people who render their services for an Amadeus Group Company through another company, Amadeus will endeavor to have such entities expressly agree to principles consistent with the CEBC.
Most senior level accountable for its implementation	Corporate Compliance and Investigations
Third-party standards or initiatives	Internationally-recognized standards and highest ethical standards
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	It is available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-code-of-ethics-and-business-conduct.pdf

Human Rights Policy - Working time, work-life balance and health and safety

Description and objectives	The purpose of the Human Rights Policy is to reaffirm Amadeus' commitment to respect and promote human rights in its operations and supply chain. Particularly, the Human Rights Policy, aligned with the Health and Safety Policy, endorses Amadeus commitment to comply with all the regulations and standards incumbent upon businesses in relation to the health and safety of their employees, to develop a healthy workplace that protects and promotes their health, safety and well-being. Additionally, the Policy recognizes the Amadeus commitment to promote employees' right to rest and leisure time and to facilitate the reconciliation of personal and professional life by reasonably limiting the length of the working day.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and receiving assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies or joint venture that have agreed to be bound by this Policy. Additionally, the Policy applies to eligible Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents.
Most senior level accountable for its implementation	The ESG Steering Committee is in charge of the approval of this Policy and acts as delegated body of the Executive Committee—that will act as final validator of decisions—for sustainability and, in particular, human rights matters. The Sustainability (ESG) Office and Sustainability (ESG) Steering Committee have the responsibility for ensuring adherence to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the Speak Up Channel and investigated by the Corporate Compliance department.
Third-party standards or initiatives	Main internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights <i>ESRS S1-1 p. 21 AR 12</i>
Interests of key stakeholders	Through internal responsible experts at corporate level who had knowledge of interests of the stakeholders
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-human-rights-policy.pdf

Global Workcation Policy	
Description and objectives	The Policy acknowledges the Amadeus commitment to promoting more flexible working arrangements and develop a way of working that fits the company's way of thinking and values
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	An internal particular process to request Workcation and flexible working conditions has been set to properly implement it.
Scope or its exclusions	Applicable to all Amadeus Group companies.
Most senior level accountable for its implementation	The head of Global Rewards reporting to Head of P&C is the highest level in the organization that is responsible for the implementation of the policy.
Third-party standards or initiatives	Not applicable.
Interests of key stakeholders	In its development, requests from employees, channeled by local P&C representatives, have been considered.
Availability	Available internally through the intranet.

Additionally, it is important to mention that at the local level, additional internal regulations, policies, and procedures have been established to adequately address and manage specific situations.

This is the case, for instance, of the Right to digital disconnection Policy, applicable in Spain and France (31.6% of Amadeus' employees). Through these policies, Amadeus acknowledges the right of employees not to reply to work-related phone calls, emails or messages outside their working hours, except in case of force majeure or exceptional circumstances⁷⁹.

S1-4 - Taking action on material impacts on own workforce - Working time, work-life balance and health and safety

Work-life balance contributes to a healthy and productive work environment. Being aware of it, Amadeus is deeply committed to creating a work environment where well-being, health and safety are paramount, actively working to foster positive impacts.

In this regard, Amadeus has implemented in the last few years a number a well-being workplace program and initiatives to support and embrace work-life balance in pursuit of this goal. Specifically, Amadeus' Health and Safety Policy mandates that each of its companies or legal entities develop and approve their own health and safety policies, programs, and procedures (see section above). Consequently, actions are implemented locally to comply with all relevant regulations⁸⁰.

Through these initiatives, Amadeus also supports the development of the Sustainable Development Goal 3 - *Ensure healthy lives and promote well-being for all at all ages*.

⁷⁹ The related policies are approved at local level and overseen by the general manager, site Manager, as applicable.

⁸⁰ Specific information from Spain, France and India have been gathered. In the future, the Group will work to compile the related consolidated information. These four countries contribute to about 51.7% of Amadeus workforce.

Key actions - Working time, work-life balance and health¹

Time horizons	These actions are executed on a regular basis (mostly annually). Consequently, particular time horizons or end-date to complete each key action are not applicable since they are recurrent.
Tracking the effectiveness	Tracking the effectiveness of the implemented actions on employee health and well-being is locally monitored: • In Spain, the department in charge carried out periodic risk assessments, health surveillance activities and feedback. • In France, feedbacks and different inputs are collected by several channels, including a third party provider, • In India, depending on the activity, different methods have been implemented to follow up its effectiveness (notes and comments from employees, reports from wellness vendor partner, etc).
Resources allocated	Regarding the resources allocated, each of these actions do not surpass the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements. The P&C team is responsible for the implementation of these actions.

Emergency plans, risk assessments, medical services, personalized ergonomics and duty of care initiatives

Scope	Spain, France, and India
Description	Several initiatives have been put in place to ensure a healthy physical work environment, reduce lost time due to illness/medical consultations, facilitate adequate resting areas; and improved work-life balance. Among others: • Periodic assessment of occupational risks per role, premises and psychosocial risks, considering emerging risks where possible. Monitoring actions are implemented as a result. • Design and implementation of emergency plans, in accordance with regulations. It includes first aiders and fire wardens as emergency teams, annual drills and BeSafe mass communication system. • Periodic monitoring of lighting, temperature, humidity and other indoor air quality parameters; cleaning activity schedule and review, including close follow-up with external partner, and restricted access to hazardous substances and equipment. • Amadeus Doctor (General Practitioner) available at the office every week. It offers general consultations, sport check-ups and travel advice². • Individual workstation ergonomic assessments are available to employees upon request. Special office furniture and other equipment (e.g. fitballs) may be used in specific circumstances, both in Spain and France. • Spaces available for anyone feeling unwell and also as lactation room, both in Spain and France. In France, intercompany childcare is available, facilitating work life balance to employees. • Equipment, guidelines and support based on concepts of flexibility, collaboration, unassigned desks, diverse space types and multiple ways of working.

Annual Health Check-up

Scope	Spain, India, UK, France, USA, Germany, Norway, Sweden ³ based employees
Description	Amadeus employees can avail a sponsored health check-up once in a year, including a physical and analytical assessment. In France for employee considered as a frequent traveler or employee and their family going on expatriation may benefit from an extended and complete health check-up. Each employee has as well a mandatory visit every 5 years and every year depending on their health.

Health and safety learning activities

Scope	Spain, France
Description	In Spain, training catalog comprising Well-being Week activities and other sessions throughout the year on healthy workplace topics, as well as specific trainings for issues identified in risk assessments and periodic refreshment training for all employees. Specific learning program to train the emotionally healthy leaders of the future are carried out as well. For its part, in France safety and security trainings are given (extinguisher handling, first aid training, safety e-learning, among others).

Actions for better health and well-being (sports teams/well-being activities and nutrition)

Scope	Amadeus Group
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Key actions - Working time, work-life balance and health¹

Description	In 2024 the first Global Well-being Amadeus event was celebrated to mark the World Mental Health Day on the 10th of October. 18 hours of Live Interactive sessions across different time zones, with 12 experts on Mental Health & Well-being were facilitated to employees. Recording of all sessions are available for 6 months to employees. In addition to this event, several initiatives have been carried out by main sites to promote work-life balance, a healthy psychosocial work environment and provide personal resources for better health: - In Spain, football and basketball teams; and onsite and online space for exercising to include exercise in daily life (sports facilities and activities). Additionally, awareness sessions on different nutritional aspects to promote healthy eating habits and specific advice are also available to employees. - In India, wellness webinars related to mental, physical, emotional and financial well-being provides employees tools to an efficiently stress management mindfulness, and improve mental health awareness. Additional webinars on wellness topics like yoga, meditation, and nutrition contribute to a holistic approach to health, addressing physical, mental, and emotional well-being. Furthermore, through the Sync Community, employees have the possibility to share in a unique platform their hobbies. The clubs at Amadeus include Music, Football, Cricket, Badminton, Volleyball, Cycling, Running, Yoga, Photography, Table Tennis, Foosball, and more. Additionally, Sync is an employee community designed for better connections and collaborations. Finally, employees have access to counselor by providing immediate and accessible mental health support. This is complemented by the employee assistance program that enables employees to face challenges in personal and professional life. This support may improve employee morale and contribute to a healthier workplace culture by ensuring that employees have a resource to turn to when they need help managing their mental health. - In France, a specific well-being program is implemented (where Amadeus has webinar, workshop, theater role playing activities, etc). Additionally, the specific Mental Well-being program has been implemented since 2008. It's made of a group of representatives from different background (staff, managers, P&C, trade unions members, medical team, work doctor, work psychologist, social workers) who meet regularly to exchange and identify any collective mental health risks to take or follow-up preventive collective measures. This is complemented by the prevention program "we care", which includes cancer awareness sessions, onsite carcinoma diagnosis, cardiovascular diagnosis, road safety awareness, and nutrition prevention. The objective is to increase employees well-being. Additionally, sport areas are available to employees (for instance, onsite tennis, beach volley, basket playground, playing game area). Finally, events and specific promoting actions are periodically developed (summer party, family days, etc).
Hybrid work model and workcation	
Scope	Amadeus Group
Description	Allowing employees to work from anywhere ⁴ certain days per year, and having the option to regularly work from home, facilitates work-life balance, e.g. by avoiding commuting time.
Flexible working schedule	
Scope	Spain, France
Description	Flexibility to distribute weekly working hours, within limits established; and possibility of taking off half days. This option facilitates work-life balance.
Seniority days, seniority gifts and flex days	
Scope	Spain, India, France
Description	Extra day of paid leave and/or gift per certain years of service, and compensation for working during weekends or bank holidays due to business trips. Amadeus recognizes and appreciates employees' contributions, generating positive impact on them, maintaining a positive work environment and fostering employee loyalty.
Childcare facilities or contributions and paid parental leave for non-primary caregiver	
Scope	Spain, France, India
Description	Amadeus supports paternity leave policies, sometimes surpassing local norms and legislation. For its part, paid parental leave for the primary caregiver (mostly called maternity leave) consists on 33 weeks in France, 16 weeks in Spain, and 26 weeks in India. Additionally, paid parental leave for the non-primary caregiver (mostly called paternity leave): 16 weeks in Spain, 4 weeks in France and 10 days in India ⁵ .

Key actions - Working time, work-life balance and health¹

Transportation service	
Scope	France
Description	A corporate shuttle service for employees is available between sites, bike rental and company bike. Additionally, specific places are available for disabled people and pregnant women. Finally, electrical charging slots are available onsite as well. In this way, employees may make use of this service provided, adapted to specific need, and work accident due to transportation may be mitigated.
Concierge service	
Scope	France
Description	An onsite and digital concierge service is provide to all France employee, offering services to ease the balance between work and personal life.

¹ Actions in Spain and India cover employees-based, while in France cover contractors and visitors (non-employees) as well. Additionally, in France medical chek-up for expatriation (employees and their families) and frequent travelers are available.

² In India, employees have access to in-house doctor and nurse, to receive prompt medical services at office premises. In France, an occupational medical service is available both onsite and remotely, available to employees, contractors and visitors.

This way, Amadeus contributes to reduces the employees cost of healthcare spending, and boos their productivity, influencing on them positively. Additionally, it contributes to reduce occupational rate accident.

³ In Sweden, the health examinations for employees not yet turned 50 years old are offered on a bi-annually base. For employees over 50, Health check-ups are offered annually.

⁴ Amadeus identifies some sanctioned countries and risks countries according to the International SOS list no eligible for this program.

⁵ In Spain, parental leave is 16 weeks as mandated by local legislation. In India employees can enjoy up to 10 days of paid paternity leave, going beyond the norm.

S1-5 - Targets related to managing material IROs - Working time, work-life balance and health

As previously indicated, Amadeus generates positive impacts related to working time, work-life balance, and health, aligned with Amadeus's commitments in this regard. Additionally, the company is planning to reinforce its roadmap in this area, particularly concerning well-being.

Notwithstanding the above, it is worth mentioning that at the main Amadeus sites, local targets focused on improving the health and well-being of individuals have already been set. Amadeus's approach is to provide information in the future related to consolidated objectives, once they have been set.

S1-14 - Health and safety metrics

In 2024, the total number of work-related accidents was 44, none of them resulting in fatalities. With regard to the number of cases of recordable work-related ill health, 0 cases were recorded.

As of December 31, 2024¹

Number of fatalities ² ESRS S1-14 p. 88 b AR 82, AR 89 - AR91	0
Number of work-related accidents ³ ESRS S1-14 p. 88 c AR 89 - AR 91	44
Rate of recordable work-related accidents ⁴ ESRS S1-14 p. 88 c AR 89 - AR 91	1.19
Number of cases of work-related ill health ⁵ ESRS S1-14 p. 88 d	0
Number of days lost due to work-related injuries and fatalities ⁶ ESRS S1-14 p. 88 e AR 95	696

¹ Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.

² Fatalities are the number of employees who lost their lives as a result of a work-related injuries and work-related ill health. To collect this information, data has been collected manually and consolidated by P&C at Amadeus.

³ Work related incidents include neck or back injury, bone injury, soft tissue injuries, burns, repetitive motion injuries, and other injuries.

To obtain work-related incidents, data has been collected manually and consolidated by P&C at Amadeus.

⁴ Rate of recordable work-related accidents (injury rate) calculated based on the number of work related accidents/ the effectively worked hours in the year* 1,000,000.

⁵ Occupation diseases arising from exposure to hazards at work. To obtain work ill health, data has been collected manually and consolidated by P&C at Amadeus.

⁶ Time ("days") that could not be worked (and is thus 'lost') as a consequence of a worker or workers being unable to perform their usual work because of an occupational accident or disease. A return to limited duty or alternative work for the same organization does not count as lost days. Number of day lost have been collected manually and consolidated by P&C at Amadeus.

In Amadeus, 87% of employees are covered by a health and safety management system, counted by headcount⁸¹.

S1-15 - Work-life balance

In 2024, 97.5% of Amadeus' employees were entitled to family-related leave. Additionally, 2.2% of entitled employees took family-related leave (1.1% men, and 4.0% women)

At December 31, 2024

% of Amadeus employees entitled to take family-related leave ^{1,2}	97.5 %
% of Amadeus employees that took family-related leave in the year ³	2.2 %
% of female that took family-related leave in the year	4.0 %
% of male that took family-related leave in the year	1.1 %

¹ Family-related leave includes maternity leave, paternity leave, parental leave, and carers' leave available to Amadeus employee:

- Maternity leave covers employment-protected leave of absence for employed women directly around the time of childbirth.
- Paternity leave covers leave from work for fathers.
- Parental leave covers leave from work for parents on the grounds of the birth or adoption of a child to take care of that child.
- Carers' leave from work includes leave for workers to provide personal care or support to a relative, or a person who lives in the same household.

² In some countries, only maternity leave is covered.

³ The percentage of employees that took family-related leave in the year, including the split by gender, is derived from the Group Ordinary Systems (Workday).

The percentage of employees entitled to take family-related leave is derived from Amadeus work-life balance-related policies.

⁸¹ ¹ Data collected manually and consolidated by P&C at Amadeus. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.
Definition of Occupational health and safety management system as provided by Global Reporting Initiative standards has been considered.

Diversity, gender equality and equal pay for work of equal value⁸²

S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value

The Group has defined its DEI strategy and goals, aligned with its first EVP pillar, and governed by P&C leadership team.

This DEI strategy is built around four strategic lines, which are the foundation on which Amadeus reinforces positive impacts and prevent, mitigate and remediate risks related to DEI:

- Attracting talent from different backgrounds and ensuring that talent acquisition practices are unbiased and inclusive.
- Enabling people to become their best selves at work by offering stimulating and equal development opportunities and ensuring that Amadeus' diversity is represented at different levels and professions.
- Fostering a culture of belonging and inclusion for everyone.
- Focusing on compliance, best practice and external expectations.

DEI topics are considered part of the *ESG Ambition*, as contemplated in its strategic line *Best selves at work* and its related long term goal (see section *ESRS 2 SBM-1 Strategy, business model and value chain - Sustainability-related goals*).

Adherence to DEI principles is also enshrined as a core element within Amadeus' fundamental internal regulations:

Key Policies - Diversity, gender equality and equal pay for work of equal value

People Policy - Diversity, gender equality and equal pay for work of equal value	
Description and objectives	The Amadeus' People Policy outlines its key commitments to fostering a workplace where every employee feels valued, respected, supported, and empowered. In particular Amadeus recognizes that it is only through a variety of opinions, perspectives and backgrounds that the company can grow as a business and as individuals. Amadeus offers equal opportunity and fair treatment at all stages of the employees' lives, from unbiased recruitment processes and promotions, pay equity, equal access to training and an inclusive, friendly work environment, free from harassment and discrimination.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and to receive assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	Senior Vice President People & Culture at Amadeus.
Third-party standards or initiatives	Law applicable in each territory or country and international practices, as set out in relevant intentional instruments.

⁸² For reporting purposes and to avoid duplication, the policies and actions related to the IROs identified in these sub-sub-topics have been grouped together, given their linkage and contribution to all of them. This includes positive impacts inked to the promotion of an inclusive and diverse work environment, particularly encouraging the inclusion and equal opportunities of women in tech, equal pay for work of equal value, among others, and the risk associated to diversity, inclusion and equal opportunities in the work environment.

Interests of key stakeholders	Key labor related topics have been considered while defining the policy.
Availability	Available internally through the intranet.

Sustainability Policy - Diversity, gender equality and equal pay for work of equal value

Description and objectives	The Sustainability Policy shows Amadeus' ESG ambition and commitment to sustainable development through sustainability principles that govern the rest of the sustainability related policies. Particularly, through its Sustainability Policy, Amadeus endeavors to fulfill a variety of goals, including fostering an inclusive and engaging culture and a caring environment, and promoting diverse representation at all levels and professions.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Policy has been approved by the Board of Directors of Amadeus and the Audit Committee is responsible for supervising the compliance with internal policies related to Environmental, Social and Governance issues, including the Sustainability Policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	The ESG Steering Committee is a ESG governing body comprised by senior executives to influence the direction of the Sustainability ambition and make regular decisions. It acts as delegated body of the Executive Committee, that will act as final validator of decisions. The Sustainability Office oversees progress, consistency, and alignment to the ESG ambition across Amadeus and continuous adaptation to trends and market requests (including the development of ESG strategy, the implementation of strategic sustainability projects, sustainability reporting and authority over key sustainability decisions), leveraging the ESG Steering Committee and the Executive Committee.
Third-party standards or initiatives	Internationally recognized standards regarding working conditions and highly ethical standards.
Interests of key stakeholders	To define the ESG Ambition, and consequently the Sustainability Policy, a bottom-up approach has been followed, involving Amadeus business units who had deep knowledge of affected stakeholders.
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/policies/amadeus-sustainability-policy-06-2024.pdf

Code of Ethics and Business Conduct (CEBC) - Diversity, gender equality and equal pay for work of equal value

Description and objectives	The Amadeus CEBC sets forth the commitment of the company to conduct business pursuant to the highest ethical standards and its strict compliance with all appropriate and applicable laws and regulations. It covers several areas, including "Our People" among others. In this regard, through its CEBC, Amadeus explicitly rejects any and all forms of discrimination based on gender, race, ethnic origin, morals, age, disability, state of health, sexual orientation, gender identity/expression, family status, religion, union activities or political beliefs.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Audit Committee is in charge of supervising the breaches of internal codes of ethics.
Scope or its exclusions	All employees of the Amadeus Group, including the members of the Executive Committee and VP/Directors, and forms part of their employment relationship with the Group or the relevant Amadeus Company. In addition to direct employees of the Amadeus Group, this also extends to agents, scholarship holders, subcontracted personnel, and, in general, all people who work or render their services in any Amadeus Group Company. In the case of subcontracted people who render their services for an Amadeus Group Company through another company, Amadeus will endeavor to have such entities expressly agree to principles consistent with the CEBC.

Most senior level accountable for its implementation	Corporate Compliance and Investigations
Third-party standards or initiatives	Internationally-recognized standards and highest ethical standards
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	It is available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-code-of-ethics-and-business-conduct.pdf

Human Rights Policy - Diversity, gender equality and equal pay for work of equal value

Description and objectives	The purpose of the Human Rights Policy is to reaffirm Amadeus' commitment to respect and promote human rights in its operations and supply chain. Particularly, Amadeus's Human Rights Policy commits to ensuring every employee is treated with respect, dignity, and fairness and that they are given equal opportunity, throughout all Amadeus human resources processes. For the Group, valuing diversity and inclusion means accepting and respecting differences between and within cultures, while acknowledging and endorsing differences based on gender, gender expression, gender identity, parental status, age, race, ethnicity, beliefs, social origin, sexual orientation, and disabilities.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and receiving assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non fully owned Amadeus companies or joint venture that have agreed to be bound by this Policy. Additionally, the Policy applies to eligible Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents.
Most senior level accountable for its implementation	The ESG Steering Committee is in charge of the approval of this Policy and acts as delegated body of the Executive Committee—that will act as final validator of decisions—for sustainability and, in particular, human rights matters. The Sustainability (ESG) Office and Sustainability (ESG) Steering Committee have the responsibility for adhering to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the Speak Up Channel and investigated by the Corporate Compliance department.
Third-party standards or initiatives	Based on the main internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights. <i>ESRS S1-1 p. 21 AR 12</i>
Interests of key stakeholders	Through internal responsible experts at corporate level who had knowledge of interests of the stakeholders
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-human-rights-policy.pdf

It is important to note that in Spain, Amadeus has implemented a Gender Equality Plan as required by Spanish law. This plan has been developed collaboratively by representatives of both Amadeus in Spain and the employees to ensure that the interests and concerns of both parties are adequately considered. The plan is managed by the Equality Committee in Spain, based on a diagnostic report, and is regularly monitored.

Furthermore, a protocol has been approved in Spain outlining the steps to be followed if any Amadeus employee believes they are experiencing sexual or moral harassment, harassment based

on gender, or any type of discriminatory treatment by colleagues or superiors. The company is also working on developing a protocol that will cover the entire Group. ^{ESRS S1-1 p. 23}

Amadeus works to promote that all employees can thrive, through constantly improving fair and transparent people processes and an inclusive culture.

S1-4 - Taking action on material IROs on own workforce - Diversity, gender equality and equal pay for work of equal value⁸³

Amadeus approaches the impacts and risks related to gender equality and pay equity, including those to encourage the inclusion and equal opportunities of women in tech and leadership positions, through a mixture of global and local initiatives. These actions are focused on the achievement of the objectives included in the policies put in place (see section above).

Through these initiatives, Amadeus also supports the development of the Sustainable Development Goal 5 - *Achieve gender equality and empower all women and girls*.

Key actions - Gender equality and equal pay for work of equal value

Time horizons	These actions are underway. Each is executed on a regular basis (mostly annually). Consequently, particular time horizons or end-date to complete each key action are not applicable since they are recurrent.
Tracking the effectiveness	In order to ensure that diversity and inclusion objectives and actions are really embedded within the organization, a team responsible for the gender equality targets implementation in every Amadeus business unit has been set. Additionally, the Amadeus' top management has directly participated in the definition of diversity and inclusion objectives and strategies, and follow them up frequently. For its part, the Head of DEI at Amadeus coordinates a network of regional and national managers who are responsible for local implementation as well as for raising awareness at local level.
Resources allocated	Regarding the resources allocated, each of these actions do not surpass individually the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements. The P&C team is responsible for the implementation of these actions.
Unbiased recruitment processes and promotions	
Scope	Amadeus Group
Description	Amadeus has redesigned the recruitment process to align and harmonize it across regions and countries, allowing for increased transparency, a better candidate experience, and unbiased and inclusive talent acquisition practices. This process has been developed to foster inclusion and equal opportunities for candidates of different backgrounds. The company applies inclusive role descriptions, makes all job postings available on the internet for everyone, and strives for balanced shortlists and interview panels ¹ . In 2024, the employer brand, employee value proposition and the external recruitment process have been reviewed from a DEI perspective. As a result, training, tools and guidelines were issued to recruiters and hiring managers. Additionally, through the internal Recruitment Academy, Amadeus offers a range of training opportunities, including courses on assessing candidates, on being a talent advisor and on DEI, aimed at developing key talent acquisition skills. The Recruitment Academy's curriculum is regularly updated to reflect the latest trends and business needs. In 2024, all recruiters took a mandatory training of Inclusive Recruitment Practices, designed and delivered by the DEI team.
Training to hiring managers and P&C professionals to avoid potential unconscious biases	
Scope	Employees - Amadeus Group

⁸³Specific questions about diversity, inclusion, and equal opportunities at Amadeus are incorporated into employee engagement processes to measure, better understand, and act on employees' feedback.

Information about how Amadeus tracks and assesses the effectiveness of the actions and initiatives under the umbrella of the ESG Ambition have been included in section *Sustainability-related goals*, at the *ESRS 2 SBM-1- Strategy, business model and value chain*.

Key actions - Gender equality and equal pay for work of equal value

Description	Hiring managers and People & Culture professionals are trained in cultural understanding and awareness of potential unconscious biases in recruitment to curtail potentially biased decisions. In 2024, the P&C community were trained in the basics of inclusive recruitment practices (100% recruiters has been trained in inclusive hiring practices in 2024) and a training for hiring managers was developed to be rolled out as mandatory in 2025.
DEI trainings for employees	
Scope	Employees at Amadeus Group
Description	DEI e-trainings for Amadeus employees have been developed, including mandatory trainings in preventing harassment and discrimination in the workplace for managers. A range of voluntary e-learning on DEI topics were launched in 2024. To track the effectiveness of this program, voluntary feedback surveys have been developed.
Equal pay	
Scope	Amadeus Group
Description	Amadeus launched in 2024 Pay Equity training for compensation planners; in 2024, 74% of Amadeus compensation planners participated in the training and it will be mandatory in 2025. Additionally, ongoing pay equity analysis, a pay equity charter, and a commitment to these principles have been established. Through this kind of actions, the Group identifies whether pay disparities exist in the organization and fosters equitable compensation to employees.
Promoting women in tech	
Scope	Amadeus Americas, Bangalore, Bulgaria, Philippines, India
Description	Amadeus carries out several initiatives in different locations where the Company operates to promote the presence of women in tech. For instance: - The Company collaborates with schools and universities, engages with the community, and promotes girls' participation in STEM programs and sponsorships. Particularly, in Colombia, Amadeus supports initiatives that aim to inspire and educate young girls about careers in technology. In Americas, the Women In Tech program co-sponsorship - Amadeus Americas is a community outreach program, co-sponsored with Amadeus' vendor, New Horizons, and the YWCA designed to close the gender gap for women in technology and to increase innovation through diversity. The program sponsored two interns from the Women in Tech program from underrepresented communities. - Additionally, in Manila Amadeus collaborates with <i>Food for Hungry minds</i> within the STEM College Program to support disadvantaged students. For the school year 2024-25, Amadeus has expanded its STEM Scholarship Program to include 14 Female College STEM Scholars and 35 Female Senior High School Scholars on STEM Track, in both Manila and Malolos schools. - In Bulgaria, Amadeus participates in the WomenHack, a networking and recruiting event, during which they had the chance to meet and interview female candidates working in IT industry, back-end and front-end developers, product managers, software developers, data scientists, UI/UX designers. This event encouraged women with Tech background to look for opportunities, to share more about the main gender equality indicators in Tech industry, and why Amadeus is a great place to work for women. - Through the UDAAN Program in India, Amadeus empowers women in tech who taken a career break, offering them a pathway to re-enter the workforce while championing gender diversity and inclusion in the workplace. Following the internships, the company may offer participant be part of Amadeus team. Through these actions, Amadeus tries to reduce the underrepresentation of women in tech and gender inequality in STEM jobs.
Amadeus Women's Network	
Scope	Amadeus Group (including Spain, Germany, France, UK, Singapore, US, Thailand, Australia, Argentina, United Arab Emirates)
Description	The Global Amadeus Women's Network aims to improve women's professional development in Amadeus. The mission is to help women develop their careers and mentor the next generation of women business leaders through programs, resource sharing, and networking opportunities, open to everyone at Amadeus, independently of their gender or location.

¹An external DEI assessment of the attractiveness of Amadeus' most common job advertisements to use inclusive language and the alignment of our branding with Amadeus DEI values were carried out in 2023. Conclusions and feedback have been incorporated in the recruitment processes.

S1-5 - Targets related to managing material IROs - Diversity, gender equality and equal pay for work of equal value

Diversity must be reflected at different levels of the organization, as outlined in Amadeus' commitments (see section *S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value*). To this end, targets have been defined under the ESG Ambition to increase the presence of underrepresented groups and promote unbiased and inclusive talent acquisition practices.

As indicated in the section above, Amadeus undertakes several actions aligned to the established objectives, including, for instance, specific training courses for hiring managers and P&C professionals to mitigate potential unconscious biases.

See section *Sustainability-related goals* containing information about how own workforce were engaged in setting targets and in tracking performance against targets.

Key targets-Diversity, gender equality and equal pay for work of equal value

Improve gender balance at senior leadership positions

Based on several studies, approximately 25% or more, depending on the study, of leadership roles at large global tech firms are held by women, and this number seems to have increased over the years. The Company is actively striving to align itself with this benchmark by setting short-term targets¹.

Target	31% women in senior leadership by 2025
Scope	Employees at Amadeus Group
Baseline value and base year	544 women by June 2023 (30.48%)
Performance against target	643 (+18%) women by December 2024 (30.99%)

¹ See, for instance, the following sources <https://www2.deloitte.com/us/en/insights/industry/technology/women-tech-leadership.html>, <https://www.weforum.org/publications/global-gender-gap-report-2022/in-full/2-4-gender-gaps-in-leadership-by-industry-and-cohort/>, <https://www.grantthornton.global/en/insights/women-in-business/women-in-tech-a-pathway-to-gender-balance-in-top-tech-roles/>

Some of these studies were conducted prior to the establishment of the target, while the other was carried out in 2024, showing the upward trend.

² Senior managers and above have been considered while defining the target. In section *S1-9- Diversity metrics*, CEO, VPs and Directors have been considered.

Increase women in engineering jobs by 2025

Target	25.5% women in engineering by 2025
Scope	Employees at Amadeus Group
Baseline value and base year	25.1% by June 2023
Performance against target	25.3% by December 2024

Increase DEI competency across Amadeus' people managers

Target	50% DEI training completion across managers at Amadeus by 2025
Scope	Employees that are managers at Amadeus Group
Baseline value and base year	0% in January 2024
Performance against target	Not available. This training will start in 2025. Nevertheless, during 2024, some trainings have started within the area of rewards, hiring and leadership.

Information about the methodology used to define the target, how Amadeus has considered stakeholders opinion and how the Group is tracking them is included in sections *Sustainability-related goals*, at the *ESRS 2 SBM-1- Strategy, business model and value chain* containing details and *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*.

S1-9- Diversity metrics⁸⁴

To follow up tangible progress, Amadeus measures diversity and inclusion metrics.

In this regard, as of December, 31, 2024 women make up 37.9% of the Group's workforce, 45.5% of the Board and 25.4% senior managers. At Amadeus, top managers category include CEO, VPs and Directors, while Associate Directors are included under Senior Managers and Managers category.

As of December 31, 2024 (Headcount)				
	Male	Female	Other	Non reported
Total number of top managers ^{1,2}	173	59	0	0

¹ Top managers include CEO, VPs and Directors, while Associate Directors are included under the Senior Managers and Managers category.

² Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies.

As of December 31, 2024				
	Male	Female	Other	Non reported
Percentage of top managers (%) ^{1,2,3}	74.6 %	25.4 %	0	0

¹ Calculation carried out relative to the total number of employees in each category.

² Top managers include CEO, VPs and Directors, while Associate Directors are included under the Senior Managers and Managers category.

³ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Gender "Other" included with the "Male" category.

As of December 31, 2024, Amadeus workforce has an age ranges from 19 to 83 years⁸⁵. Employees under 30 years of age make up 17.3% of the total employees, while 63.6% the other between 31 and 50 years of age, and the remaining one (51 and above) accounted for 19.2%.

As of December 31, 2024 (headcount) ¹	
Under 30 years old	3,561
30-50 years old	13,122
Over 50 years old	3,960

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group. Calculations include all employees (full-time and part-time employees), and data is given on a headcount basis.

S1-12- Persons with disabilities

Amadeus makes as many adaptations as necessary to promote the adequate participation in the employment calls regardless of their candidates condition, paying special attention to those who may have any disability, in any of its forms.

At the end of the 2024, the Group has 263 employees with functional diversity (by headcount).

As of December 31, 2024	
Percentage of employees with a disability (%)	1.3 %

⁸⁴ At Amadeus, professional categories include:

- Executive Level (CEO, VPs and Directors)
- Associate Directors
- Senior Manager
- Manager
- Staff

For reporting purpose, some categories have been grouped when applicable.

⁸⁵ Exceptionally the maximum age of an Amadeus employee is 83, although generally retirement age takes place in the mid 60s.

Data have been obtained manually. To achieve this, the various sites where Amadeus operates were consulted, providing raw data that has been ultimately consolidated by P&C.

S1-16: Remuneration metrics (pay gap and total remuneration)

Pay gap

To calculate average gross hourly pay level of both male and female employees, total target compensation (base salary, target annual bonus and target long-term incentive) has been considered.

The unadjusted global gender pay gap, shown as a percentage, is calculated as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees, applying the following formula:

$$\frac{(\text{Average gross hourly pay level of male employees} - \text{Average gross hourly pay level of female employees})}{(\text{Average gross hourly pay level of male employees})} * 100$$

Amadeus determines average gross hourly pay level of both male and female employees and the unadjusted gender pay gap.

Average gross hourly pay level and unadjusted gender pay gap

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As of 31st December, 2024

Average gross hourly pay level of male employees	€	37.4
Average gross hourly pay level of female employees	€	33.2
Gender pay gap (unadjusted)		11.3 %

Average gross hourly remuneration shown above refers to total target compensation (base salary, target annual bonus and target long-term incentive) divided by the contractual hours per annum. The unadjusted gender pay gap, shown as a percentage, is calculated as the difference between the average gross hourly compensation of male employees and the average gross hourly compensation of female employees, divided by the average gross hourly compensation of male employees, without adjusting for factors such as job function, job level, performance, location, etc. Consequently, this number is not adjusted for objective factors.

The gender pay gap split by professional category is:

Gender pay gap by professional category and weighted gender pay gap

As of 31st December, 2024

Executive Level	18.0 %
Associate Directors	3.0 %
Senior Manager	4.0 %
Manager	7.3 %
Staff	1.2 %
Total (Weighted Average)	3.2 %

The weighted overall gender pay gap, shown as a percentage, is calculated as the difference between the average gross hourly pay of male employees and the average gross hourly pay of female employees divided by the average gross hourly pay of male employees.

During the last years, the weighted overall gender pay gap has been decreasing. This is partly due to Amadeus's efforts to reduce gender pay disparities. This work is crucial to Amadeus DEI strategy and is linked to the sustainability goals. The overall gender pay gap (weighted average) is mainly due to Amadeus' global presence and the higher number of men in senior roles. Improving in this area is strategically important for the company. For the past two years Amadeus has been working with consultants to improve its processes, manager training and internal equity analysis.

Although Amadeus' does not yet disclose the adjusted gender pay gap, the company is planning to assess and monitor it, ensuring that any pay differences are justified by objective and explainable factors such as performance, job family, job level, and location. When Amadeus reviews salary differences in light of objective factors like country and job level, the gap reduces to a less than five percent, looking at the global average.

Raw data have been extracted from Group's ordinary system (Workday).

Annual total remuneration ratio

In 2024, the Executive Director's -the highest paid individual at Amadeus- total accrued remuneration amounted to €3,936,735.0, while the median annual total remuneration for employees (excluding the highest-paid individual) amounted to €68,245.0 and the ratio of these amounts is 57.7.

As of 31st December, 2024
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Total annual compensation of the company's highest-paid person	€3,936,735.0
Median of the total annual employee compensation (excluding the highest-paid individual)	€68,245.0
Ratio of the highest-paid person	57.7

The ratio of the highest paid person to the median employee, shown as a percentage, is calculated as the total annual compensation of the company's highest paid person, divided by the median of the total annual employee compensation.

The total compensation is calculated considering the annual base salary as of December 2024. Cash benefits (bonus and special payments), benefits in kind and long term incentive refer to actual paid during fiscal year 2024, which may be related to prior year performance. For benefits in kind, the global total amounts converted into euros are used and divided by the number of employees in FTE (see section S1-6 - Characteristics of the undertaking's employees) included in the median calculation.

Raw data have been extracted from internal system (Workday).

Training and skills development, including talent attraction and retention⁸⁶

S1-1 Policies related to own workforce - Training and skills development, including talent attraction and retention

Amadeus recognizes that attracting, developing, and retaining talent is crucial to its success. The Group supports the growth of its people with relevant and state-of-the-art learning and development opportunities, encouraging mobility and assuming different roles.

This is embedded in the second EVP pillar “Dare to Grow”. It inspires the ESG Ambition, and its strategic line *Talent magnet*, through which the Company pursues to attract talent from different backgrounds to power travel technology evolution (see *ESRS 2 SBM-1- Strategy, business model and value chain*, section *Sustainability-related goals*), and the DEI strategy as well.

Regarding Amadeus’ internal rules, the People Policy and the Sustainability Policy include among their commitments to empower talent journeys.

Key Policies - Training and skills development, including talent attraction and retention

People Policy - Training and skills development, including talent attraction and retention

Description and objectives	The Amadeus’ People Policy outlines its key commitments to fostering a workplace where every employee feels valued, respected, supported, and empowered. In particular: • Training and skills development. Amadeus is committed to provide training and development opportunities for employees’ growth and enable them to reach their full potential. The company wants employees to thrive and work towards their individual career goals, aligned with business priorities. • Talent attraction and retention. Amadeus is committed to attract and retain talent from different backgrounds by creating a positive candidate experience, supporting informed decision-making, an unbiased and inclusive recruitment process, offering a rewarding and supportive equal opportunity work environment that enables people to become their best selves.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company’s policies and rules in the environmental, social and corporate governance area and to receive assurances from Management that the Company’s environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	Senior Vice President P&C at Amadeus.
Third-party standards or initiatives	Law applicable in each territory or country and international practices, as set out in relevant intentional instruments.
Interests of key stakeholders	Key labor related topics have been considered while defining the policy.
Availability	Available internally through the intranet.

⁸⁶ For reporting purposes and to avoid duplication, the policies and actions related to the IROs identified in these sub-sub-topics have been grouped together, given their linkage and contribution to all of them. This includes positive impacts linked to the promotion of employees career and competencies development, and risk and opportunity associated to talent attraction and a robust brand identity, respectively.

Key Policies - Training and skills development, including talent attraction and retention

Sustainability Policy - Training and skills development, including talent attraction and retention

Description and objectives	The Sustainability Policy shows Amadeus' ESG ambition and commitment to sustainable development through ESG principles that govern the rest of the sustainability related policies. Particularly, the policy includes among its commitments to empower talent journeys by, among others: • Fostering an inclusive, caring, and engaging culture to attract, develop talent. • Offering development opportunities to Amadeus employees, and being active sponsors of their professional development and career growth.
Related material IROs	See section <i>ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model</i>
Process for monitoring	The Policy has been approved by the Board of Directors of Amadeus and the Audit Committee is responsible for supervising the compliance with internal policies related to Environmental, Social and Governance issues, including the Sustainability Policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other non-fully owned Amadeus companies that have agreed to be bound by this Policy.
Most senior level accountable for its implementation	The ESG Steering Committee is a ESG governing body comprised by senior executives to influence the direction of the Sustainability ambition and make regular decisions. It acts as delegated body of the Executive Committee, that will act as final validator of decisions. The Sustainability Office oversees progress, consistency, and alignment to the ESG ambition across Amadeus and continuous adaptation to trends and market requests (including the development of ESG strategy, the implementation of strategic sustainability projects, sustainability reporting and authority over key sustainability decisions), leveraging the ESG Steering Committee and the Executive Committee.
Third-party standards or initiatives	Internationally recognized standards regarding working conditions and highly ethical standards.
Interests of key stakeholders	To define the ESG Ambition, and consequently the Sustainability Policy, a bottom-up approach has been followed, involving Amadeus business units who had deep knowledge of affected stakeholders.
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/policies/amadeus-sustainability-policy-06-2024.pdf

S1-4 - Taking action on material IROs on own workforce - Training and skills developments, including talent attraction and retention

Amadeus has a positive impact on its employees by providing attractive training and development opportunities that help them realize their potential and ambitions.

To do that, Amadeus continuously evolves its key people processes. The Group has adapted its competency-based interview training to the new situations hiring managers, recruiters and candidates can expect. Additionally, frameworks, toolkits and best practices have been designed and implemented to identify, develop and retain future leaders of the organization.

In relation to learning opportunities, Amadeus offers blended learning opportunities, including face-to-face, virtual and online training sessions on soft and hard skills. Corporate training tools are available, giving employees empowerment to decide on their own training demands. P&C team also develops customized leadership training for different business areas to help managers address the specific challenges they face.

Finally, to reduce, mitigate and prevent risks, the Group strengthens its employer brand through corporate social media channels, and using market-leading recruitment tools to broaden our reach and access to diverse talent pools, among others.

Through these initiatives, Amadeus also supports the development of the Sustainable Development Goal 4 - *Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all*.

Key actions - Training and skills developments, including talent attraction and retention

Time horizons	These actions are underway. Each is executed on a regular basis, (mostly annually). Consequently, particular time horizons or end-date to complete each key action are not applicable since they are recurrent.
Tracking the effectiveness	Information about how Amadeus tracks and assesses the effectiveness of the actions and initiatives in delivering outcomes have been included in section <i>Sustainability-related goals (ESRS 2 SBM-1- Strategy, business model and value chain</i> .
Resources allocated	Regarding the resources allocated, each of these actions do not surpass individually the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements. The P&C team is responsible for the implementation of these actions.
Amplify employee experiences - Amadeus Competency model & Leadership and Technical/Expert career paths	
Scope	Amadeus Group
Description	The concept of employee experience includes activities such as onboarding, social and professional gatherings, company trips, student projects and recruitment events. Through the competency model, Amadeus has designed the framework used to explain what competencies are required to evolve throughout employees career. The model explain what is expected of each employee, at different career stages.
Global Referral Program	
Scope	Employees at Amadeus Group
Description	The program is designed to encourage Amadeus employees to be ambassadors for Amadeus. Through this program, Amadeus employees can refer candidates to a vacancy. If the candidate is hired, they receive an award. The program is effective since 2023.
Talent reviews	
Scope	Employees at Amadeus Group (managers and senior managers)
Description	Talent Review is a strategic process to safeguard sustainability of the business by identifying organizational gaps and assessing the talent pool. This consists of a series of structured, facilitated meetings where 6000 approximately employees are reviewed to assess their key strengths, areas for development, career goals, and possible career evolution.
New onboarding process	
Scope	Amadeus Group
Description	Amadeus has designed a new inclusive onboarding process that accompanies the newcomer, starting before the day they join and continuing throughout their first 12 months. The goal is to facilitate the path of newcomers to belonging and reinforce retention rates.
Mentoring	
Scope	Amadeus Group
Description	Specific training sessions are delivered to upskill the participating mentors, offering a variety of functional, local and regional mentoring programs across Amadeus covering different profiles and development needs—from technical to leadership roles, from junior to senior profiles. Specific mentoring programs for women have been designed. Through the Global Mentoring Program, the most senior leaders support the development of Amadeus future leaders. Mentors share their insights, knowledge and experience with the mentees, focusing on supporting both their professional and personal growth. Mentee's background, current development needs and role challenges are taken into account to pair them with a mentor that's been through similar experiences and has the knowledge and skills to effectively support them in their development. Employees from different sites, regions and business units are matched to increase global understanding and visibility as well as enhance cooperation. Coaching activities are also available in some sites (for instance, Spain).

Key actions - Training and skills developments, including talent attraction and retention

Employer branding and employer value proposition

Scope Amadeus Group

Description During 2024, Amadeus has been re-evaluated its employer branding strategy and employer value proposition, to enhance the company's ability to attract, engage and retain top talent. Key programs have been scheduled for implementation from 2024 to 2025.

Global Career Week

Scope Employees at Amadeus Group

Description In 2024 the first Global Career Week was launched to encourage employees to take ownership of their career development and highlight all internal tools available. More than 2,500 employees participated across 11 sessions.

Leadership Upskilling programs

Scope Senior managers, Associate Directors, Directors, VPs in Amadeus Group

Description Amadeus carries out several upskilling programs to enhance leadership capabilities, develop on an annual basis. Among others:

- SHINE program tries to harmonize the skill set and capabilities of Amadeus Senior Managers and equip them with the right tools mindset and skill sets to build the future of travel in Amadeus, with a specific focus in inclusive leadership and team development.
- Amadeus Leadership Development Program (ALDP): The goal of the program is creating a mindset for change and enhance leadership capabilities, foster innovation and an agile approach.
- Amadeus also offers six leadership and management learning paths in LinkedIn Learning for managers and senior managers.
- Inclusive Leadership for Associate Directors and above: specific focus on how to create inclusive and equitable talent management. To track the effectiveness of this program, feedback surveys are carried out and several ratios have been defined.

Digital platforms for improving employees skills and capabilities

Scope Employees at Amadeus Group (depending on the activity)

Description Amadeus develops a diverse array of activities, allowing learners to gain new skills as well as improve existing skills in several areas. Specifically, Amadeus endeavors to furnish employees with a variety of digital learning platforms, enabling them to access these resources at any time (Coursera Platform, O'Reilly Platform, LinkedIn Learning, Pluralsight, KnowB4). These learning platforms offer state-of-the-art courses to enhance the development of specific skills. The Global Learning Hub on Amadeus intranet also provides access to learning offerings from all parts of the business. These platforms allow learners to gain new skills and knowledge as well as improve existing ones in areas like functional, technology and soft skills. The learner will use these new skills for career development. Regularly the usage of the platforms is analyzed to assess critical skills required by Amadeus in the future and prepare and train the workforce accordingly to build up these skills.

ESG Fundamentals Learning Campaign

Scope Employees at Amadeus Group

Description Increase Amadeus employees understanding of sustainability in general, the Amadeus ESG strategy, and their competency to identify specific sustainability risks and opportunities in their work. The training execution, expected to be completed by the end of 2025, is part of the company's ESG objectives and it aligns to the corporate Sustainability policy. Completion rates and quantitative and qualitative comments are periodically monitored.

Customized learning programs for business units

Scope Different departments in Amadeus Group

Key actions - Training and skills developments, including talent attraction and retention

Description	Amadeus carries out several training programs to train teams so that they become more knowledgeable of the products and customer ecosystem, hence increase customer satisfaction. Additionally, the company carries out specific training campaigns particularly designed and focused on some fields of knowledge. Among others: - Customer Life Cycle (CLC), which defines tailored learning journeys for each of Amadeus' commercial roles to provide structured capacity building, product knowledge, tools and skills. - Develop, Navigate and Achieve (DNA), a knowledge management program focusing on travel distribution product knowledge. - Product Life Cycle (PLC), a program to learn how to apply specific product capabilities in each PLC phase. - DTS Academy. The DTS Academy aims to be a powerful tool to help all employees to develop new skills and stay up to date with the latest industry and technology trends. - Certain units within Amadeus have established specific training activities, such as academies, to foster and enhance their knowledge. Examples include the People and Culture Academy and the Legal Academy. Surveys are launched to monitor the effectiveness of the program. Additionally, in specific cases other measures are implemented to make the offer evolve.
Functional learning via intranet	
Scope	Employees at Amadeus Group (depending on the program)
Description	Specific programs are designed to allow employees to improve their skills and knowledge in AI, Cloud and agile frameworks delivering better business outcomes, increase customers' satisfaction and employees' engagement. Additionally, they try to reduce manual tasks and improve employees effectiveness through automatization. Surveys are launched to learners. In some cases, the progress of the up-skilling program for each Business Units is analyzed frequently to launch a call to action when needed.

S1-5 - Targets related to managing material IROs - Training and skills developments, including talent attraction and retention

In line with Amadeus commitments to promote talent and learning opportunities (see section *S1-1 Policies related to own workforce - Training and skills development, including talent attraction and retention*), the Group has defined a set of targets in the ESG Ambition. They have been defined to improve positive impacts, reinforce opportunities and reduce related risks to training and skills developments, talent attraction and retention.

In terms of reporting process, some of the targets have been classified as internal. For this reason, the company opts for no disclosing the related information.

S1-13 - Training and skills development metrics

Amadeus carries out an annual performance review process to make sure that employees are recognized for their individual performance and equally important, as a tool to manage career progression and lift the potential of each employees.

It is an ongoing process of communication between employees and the respective line manager that occurs throughout the year, in support of accomplishing the strategic objectives of each unit and the company.

The Performance Management process is composed by some key activities. At the beginning of the year, it helps to align individual objectives with organizational objectives and strategy. During the year, employees and their managers have regular conversations to speak about the progression of the goals and projects. These regular conversations also serve as career checkpoints that safeguard employees are heading in the right direction and that the company understands what they need. At the end of the annual cycle, the process serves to formalize feedback on performance which is in turn linked to the annual bonus cycle, making sure that employees are recognized for their individual performance and contributions.

Percentage of employees who participate in periodic performance reviews

At Amadeus, 100% of employees participated in regular performance and career development reviews⁸⁷.

As of December 31, 2024

	Male	Female	Other	Non reported	
Proportion of performance reviews per employee ¹		1	1	1	0

¹All the process is managed through the Company Ordinary system (Workday).

The end-year review is a mandatory activity while the mid-year review is optional. Even though, there are some employees who decide to not participate in the process (due to voluntary or involuntary reasons, or their respective line managers decision).

As of December 31, 2024

	Male	Female	Other	Non reported
Revisions in proportion to the number of revisions agreed by management ¹	99.3 %	98.9 %	100 %	— %

¹All the process is managed through the Company Ordinary system (Workday).

According to the internal process, the launch of the employee yearly review starts in early December and finishes in mid-February. Consequently, the information for the 2023-2024 performance management process review has been considered in this report.

Average number of hours of training offered to and completed by employee

As of December 31, 2024

	Male	Female	Other	Non reported
Number of total hours offered and completed by employees	284,827.6	179,165.9	21.0	0
Average number of hours of training per employee ¹	23.7	23.9	21.0	0

¹ To calculate the indicator, the average number of employees (headcount) in 2024 has been considered as denominator (see S1-6 Characteristics of Amadeus employees for details), according to the following formula:

Average number of hours of training per employee = Number of total hours offered and completed by employees/Average number of employees (headcount) in 2024

Total training hours offered to and completed have been considered, except for Amadeus subsidiaries Vision Box and Voxel, due to their integration during 2024 in the Group (accounting for 3,5% of total Amadeus employees). Data has been extracted from the Group ordinary systems (Workday, LinkedIn, PluralSight, Coursera, O'Reilly and RedHat).

⁸⁷ Including all employees categories. It does not apply to non-employees.

4. GOVERNANCE INFORMATION - ESRS G1 - BUSINESS CONDUCT

Corporate ethics and responsible behavior are crucial in the industry in which Amadeus operates. For the Group, good governance and responsible business are about guiding good decisions, conducting the business legally and ethically, and safeguarding that these principles are embedded in the company day-to-day activities.

The company has implemented the Corporate Compliance Program, consisting of the establishment of processes, procedures, and controls to foster a workplace culture that values integrity and ethical conduct. This framework allows Amadeus to properly identify risks and implement activities to prevent and/or mitigate the commission of any criminal action that could impact the Company.

This is reflected in Amadeus sustainability strategy as well. *Be a reference of trust and integrity* is one of the four ESG Ambition commitments, spread out in three strategic lines, and seven long term goals (see section *Sustainability-related goals*, in *ESRS 2 SBM-1- Strategy, business model and value chain* for more details).

ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies related to business conduct

Amadeus and its executive management are committed to successful company growth in compliance with the highest standards of corporate compliance and business ethics. This is outlined in its Code of Ethics and Business Conduct, Anti-Bribery and Anti-Corruption, Corporate Crime Prevention, Anti-Fraud, Conflicts of Interest and Speak Up global policies, among others. To this end, Amadeus compliance processes are based on a clear governance structure defining roles and responsibilities regarding compliance and related activities undertaken throughout the company.

The Board of Directors shall ensure that the company complies with its ethical duties and its duty to act in good faith. A reference to the expertise of the members of the Board of Directors on business conduct matters has been included in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*.

For its part, the fundamental responsibilities of the Audit Committee are to advise the Board of Directors and supervise, without intervention in the execution or management of the company's Senior Management and executive bodies (see more details in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*).

Particularly, among other duties, the Audit Committee shall:

- Supervise the functioning of the whistleblower channels established by the company so that Management and the governing bodies can receive alerts from employees and other persons related to the company concerning potential irregularities or breaches of regulations, especially those having financial, accounting or sustainability implications or any other nature, or breaches of internal codes of ethics, and can propose appropriate actions to improve the functioning of the channel and reduce the risk of future irregularities. To do this, the Audit Committee should regularly receive information on the functioning of the whistleblower channel, including the number of complaints received, their source and type, the outcome of investigations and proposed actions. The whistleblower channels must guarantee confidentiality and, in any case, enable communications to be made anonymously, respecting the rights of both the complainant and the accused party.

- Evaluate whether the company has correctly applied the applicable policies and reporting regulations, based on the available information sources (both internal and external), monitoring the correct application of applicable standards, criteria and principles and the adequate delimitation of the consolidation perimeter.
- Inform on the Related Parties Transactions which must be approved by the General Shareholders' Meeting, or by the Board of Directors and to supervise the internal process established by the company for those transactions where approval has been delegated.
- Supervise the effectiveness of internal control and risk management systems as a whole, embracing both financial and non-financial risks (including, among others, legal, sustainability, political and reputational or those related to corruption), ensuring that risk supervision is included in Committee Meeting agendas so that significant financial and non-financial risks can be analyzed over the course of the year, reassessing the list of risks and the level of tolerance established for each risk, identifying emerging risks, and meeting at least annually with the officers heading up the risk and compliance area in order to analyze the risk map (see more information in section *GOV-5 – Risk management and internal controls over sustainability reporting*).
- Supervise the compliance with the company's policies in sustainability related matters, and internal rules of conduct.

For its part, the Corporate Compliance and Investigations reports on the progress and effectiveness of the Corporate Compliance Program at least annually to the Audit Committee and Board of Directors.

Additionally, the Corporate Compliance and Investigations safeguards that Amadeus functions in a legal and ethical manner while meeting Amadeus' business goals by:

- Drafting and keeping policies related to Corporate Crimes; assisting the organization answer questions regarding these policies.
- Staying abreast of international anti-corruption rules and ensuring Amadeus' compliance with these regulations in the operating locations.
- Designing and implementing internal controls to effectively measure and manage corporate criminal risk Amadeus faces.
- Conducting due diligence of third parties on factors such as anti-corruption, compliance, trade sanctions and adverse media reports.
- Conducting investigations when allegations regarding misconduct arise⁸⁸.

Amadeus has also implemented the Compliance and Ethics Board (CEB). This is a multi-disciplinary and cross-functional board, chaired by the Chief Risk and Compliance Officer, and composed of senior representatives of most company divisions. The CEB's mission is to provide supervision and guidance on corporate policies and related activities across Amadeus by enhancing the involvement of the business units in the proactive management of compliance risks, including corporate crime prevention controls. The CEB reports to the Executive Committee.

⁸⁸ Corporate Compliance and Investigations will evaluate the matter, perform an investigation if required, and prepare a report, except if:

- The report is against Corporate Compliance and Investigations, or Corporate Compliance and Investigations 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.
- 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 and Investigations. If the report is against a member of P&C, it will be automatically routed to Corporate Compliance and Investigations.
- In some cases, due to the sensitivity of the facts reported or the technical complexity of the investigation, Corporate Compliance and Investigations may decide to have an investigation carried out by an independent third party (e.g., a law firm or a consultant).

See more information in section *G1-1 - Business conduct policies and corporate culture*.

Finally, it is important to mention that Amadeus' commitment to integrity and transparency begins within the own workforce. Amadeus employees adhere to the ethical standards set forth in the Amadeus Code of Ethics and Business Conduct and related policies. These standards serve as the foundation for promoting positive behaviors that contribute value to the business and promote the company is governed by the highest standards of integrity.

ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct

The process of identifying and assessing material impacts, risks and opportunities related to business conduct is described in section *ESRS 2 IRO-1- Description of the process to identify and assess material impacts, risks and opportunities*.

This work did reveal several positive impacts linked to compliance and ethics matters -responsible business conduct, human rights management-, and the protection and confidence generation in Amadeus stakeholders, through the implementation of accessible mechanisms and channels⁸⁹. Additionally, the company generates positive impact by reinforcing sustainable practices among suppliers through its purchasing policies and procedures. Responsible lobbying activities through collaborations with industry key stakeholders as well as encouraging fair competition are also remarkable positive impacts generated by the company. As opposite, based on the assessment, no material negative impacts have been identified in this regard.

On the other hand, if applicable, potential breaches of internal policies could expose the company to regulatory risk. Regulatory risks related to anti-competitive practices has been identified as material as well. These could financially affect to Amadeus (financial performance, cash flows, and access to finance and cost of capital) (see additionally section *ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model*).

In this regard, Outpayce associated risks should be highlighted. As an electronic money institution⁹⁰, this Amadeus company is particularly exposed to risks inherent to the sector in which it operates, particularly money laundering, among others.

ESRS - G1- Business conduct Impacts, risks and opportunities		
Sub-topics	Time horizons ¹	Scope
Corporate culture + Protection of whistle-blowers +	-	Own operations and value chain
Political engagement and lobbying activities +	-	Own operations
Management of relationships with suppliers +	-	Upstream
Corruption and bribery (breach of regulations) R	Long-term	Own operations
Intellectual property protection and competitive behavior + R	Long-term	Own operations

+ Positive impact R Risk

¹Identified impacts are actual. Consequently, time horizons are not applicable.

⁸⁹ See Section GOV-4 – *Statement on due diligence* containing information about human rights compliance and management at Amadeus.

⁹⁰ Outpayce is a wholly owned subsidiary of Amadeus IT Group. As of December 31, 2024 the regulated activity has not been significant. An Electronic Money Institution (EMI) license is granted by regulatory authorities for qualified companies to provide regulated payment and e-money services, related to the issuance, storage and transfer of electronic money (a digital alternative to cash). See additional information in section Amadeus' products and services, business model and value chain, included in *ESRS 2 SBM-1- Strategy, business model and value chain*.

G1-1 - Business conduct policies and corporate culture⁹¹

As a part of the Corporate Compliance Program, Amadeus supports the business with a set of policies designed to comply with regulations, certain agreed behaviors, and the application of ethics and compliance practices. Among Amadeus' main corporate policies, the following ones contribute to consolidate a model of responsible business.

In this regard, Amadeus periodically assesses the adequacy of its policies, as part of the Corporate Crime Prevention program, including the scope and key stakeholders.

Key policies - Business conduct and corporate culture

Code of Ethics and Business Conduct (CEBC) ¹	
Description and objectives	The Amadeus CEBC sets forth the commitment of the company to conduct business pursuant to the highest ethical standards and its strict compliance with appropriate and applicable laws and regulation. It is based on the following values: • Customers First • Working Together • Taking Responsibility • Aiming for Excellence. The CEBC reflects who Amadeus is and how Amadeus conducts its business, covering multiple topics such as discrimination and harassment, human rights, a sustainable environment, anti-bribery and anti-corruption, among others. Amadeus guiding principle is integrity –the personal integrity of each and every member of the Amadeus community and its professional integrity as a business organization-. Employees must avoid conflicts of interests, including situations where competing professional or personal interests put in question the impartial fulfillment of professional duties. Additionally, employees should never use their position within Amadeus, or the resources of Amadeus, to obtain benefits for themselves, relatives, or third parties connected to them.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	Amadeus periodically assesses the adequacy of its policies, as part of the Corporate Crime Prevention program, including the scope and key stakeholders. The Audit Committee is in charge of supervising the breaches of internal codes of ethics.
Scope or its exclusions	All employees of the Amadeus Group, including the members of the Executive Committee and VP/Directors, and forms part of their employment relationship with the Group or the relevant Amadeus Company. In addition to direct employees of the Amadeus Group, this also extends to agents, scholarship holders, subcontracted personnel, and, in general, all people who work or render their services in any Amadeus Group Company. In the case of subcontracted people who render their services for an Amadeus Group Company through another company, Amadeus will endeavor to have such entities expressly agree to principles consistent with the CEBC.
Most senior level accountable for its implementation	Corporate Compliance and Investigations
Third-party standards or initiatives	Internationally-recognized standards and highest ethical standards. Applicable laws and regulations pertaining to health and safety, labor, discrimination, insider trading, taxation, data privacy, competition and anti-trust, the environment, public tenders, anti-bribery and anti-money laundering, among others.
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	It is available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-code-of-ethics-and-business-conduct.pdf

¹See more information about the Amadeus CEBC and its commitment to Amadeus employees in sections S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages, S1-1 Policies related to own workforce - Working time, work-life balance and health and safety, and S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value

⁹¹ The material associated IROs reflect positive impacts linked to the implementation of responsible business conduct through the CEBC, as well as human rights management and the protection and building of trust among Amadeus' stakeholders through the implementation of accessible mechanisms and channels. Additionally, a material risk related to potential breaches of internal rules has been identified.

Anti-Bribery and Anti-Corruption Policy

Description and objectives	This Policy, consistent with the United Nations Convention against Corruption, demonstrates Amadeus's commitment to securing business through fair and honest competition in the marketplace and achieving successful company growth while adhering to the highest standards and rules of business ethics, both internally and externally. Amadeus complies with both the letter and spirit of applicable international anti-corruption laws in conducting its business, which includes fulfilling obligations under these laws. Specifically, the Policy outlines accountability, the consequences of violations, information on how to report actual or suspected violations, and key definitions and prohibited conducts related to anti-bribery, gifts and entertainment, charitable and political contributions, and third-party compliance due diligence. Particularly, those under the scope of the policy may not: • Offer-promise; agree to pay; authorize payment of; pay or give- or receive-agree to receive; or solicit anything of value to or from any third party to secure or reward and improper benefit or to procure an unfair business advantage. This includes facilitation payments. • Offer or receive cash or cash equivalents such as gift vouchers, per diems; or any other gift & entertainment to secure or reward and improper benefit, performance of a function, activity or to procure an unfair business advantage. The Policy also lists some rules and/or internal practices to address different situations and reduce bribery risks. See section G1-3 - <i>Prevention and detection of corruption and bribery</i> for further details.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	Amadeus periodically assesses the adequacy of its policies, as part of the Corporate Crime Prevention program, including the scope and key stakeholders.
Scope or its exclusions	Employees -including the Amadeus executive management, officers, directors and contractors-, agents, intermediaries, consultants, sub-contractors, suppliers and Joint Venture partners of Amadeus are under the scope of this policy.
Most senior level accountable for its implementation	The prevention of bribery or corruption in any form is the responsibility of Amadeus executive management. For its part, Corporate Compliance and Investigations is the owner of the Anti-Bribery & Corruption Policy. This unit shall oversee and administer the Policy, develop and maintain procedures and guidelines to support the Policy and work with key stakeholders to ensure Amadeus' officers, employees and contingent staff affected by the Policy receive adequate communication and training.
Third-party standards or initiatives	Highest standards and rules of business ethics, both internally and externally, including United Nations Convention against Corruption. Applicable international anti-corruption laws, including but not limited to: Law 10/1995 of the Criminal Code of Spain, The Anti-Corruption Act 2007 of France, the Criminal Code and the Act on Combating International Bribery 1997 of Germany, the Bribery Act 2010 of the UK and the Foreign Corrupt Practices Act ("FCPA") of the U.S.A
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	The policy is available to stakeholders, including the administrative, management and supervisory bodies members, Amadeus own workforce and business partners, at https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-abc-policy.pdf

Anti-Fraud Policy

Description and objectives	The objective of this Policy is to prevent fraud and promote a culture which deters fraudulent activity. It also aims to develop procedures for timely and appropriate investigation of fraud and related offenses and, along with other internal rules, establish procedures and protections for confidential and safe reporting of any suspected fraudulent activity by any employee. The Policy defines what fraud is and what it covers². Prohibited conducts and situations are also described, including those related to procurement and RFPs (Requests For Proposal), payments for goods and services, Computer/IT fraud or tax fraud, among others. Appropriate procedures, controls and monitoring activities (Anti-Fraud Controls) to protect against the commission of fraud are also mentioned within the Policy. Additionally, responsibilities within the units are described. If fraud has been committed, Amadeus will promptly take such action as is appropriate to remedy the situation, clarify individual responsibilities, take appropriate disciplinary and legal actions, and leverage lessons learned in order to improve the internal controls wherever needed.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	• Management shall advocate and develop a corporate culture of honesty and integrity. • Corporate Compliance and Investigations is responsible for establishing and maintaining a system of internal controls, including mechanisms for reporting and investigating incidents of fraud and ensuring that appropriate legal and/or disciplinary action is taken against perpetrators of fraud. • Group Internal Audit provides independent, risk-based and objective assurance to the Amadeus Board of Directors and Executive Committee. • The SVP Legal, Executive Committee and the Audit Committee will receive regular updates on any fraud cases, if applicable. • Finally, each employee is responsible for acting in accordance with the Policy, and report in case of suspicion.
Scope or its exclusions	The Anti-Fraud Policy applies to all Amadeus Group employees, including the Amadeus executive management, officers, directors and contractors. Agents, intermediaries, consultants, sub-contractors, suppliers and Joint Venture partners, persons and companies working on behalf of Amadeus worldwide must also comply with anti-fraud laws applicable to them and/or the standards set in this Policy, whichever is higher, when working on behalf of Amadeus.
Most senior level accountable for its implementation	Amadeus Executive Management.
Third-party standards or initiatives	Highest standards of business ethics, laws, rules, and regulations governing anti-fraud.
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	This Policy is internally available to Amadeus own workforce in the Amadeus intranet.

²At Amadeus, fraud can encompass any crime for gain that uses deception as its principal method of operation. Fraud covers a wide range of irregularities and illegal acts characterized by intentional deception or misrepresentation to induce another to act to their detriment.

Conflict of interest Policy

Description and objectives	The Conflict of interest Policy expresses the Amadeus commitment to successful Company growth in compliance with the highest standards of business ethics, including complying with laws, rules, and regulations governing conflicts of interest, in all the countries where Amadeus operates. The Policy describes what a conflict of interest is, including some examples, and how to disclose it. Finally, it outlines the consequences of non-compliance or failure to disclose a conflict of interest.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>

Process for monitoring	Amadeus periodically assesses the adequacy of its policies, as part of the Corporate Crime Prevention program, including the scope and key stakeholders.
Scope or its exclusions	This Policy applies to all Amadeus employees, including executives, directors, and contractors. It also extends to agents, consultants, and partners working on behalf of Amadeus. Compliance is mandatory, with local standards taking precedence.
Most senior level accountable for its implementation	The owner of the Policy is Corporate Compliance and Investigation, which shall oversee and administer it.
Third-party standards or initiatives	Highest standards of business ethics, including complying with laws, rules, and regulations governing conflicts of interest
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	This Policy is internally available to Amadeus own workforce in the Amadeus intranet.

Community Impact and Charitable Donations Policy

Description and objectives	This Policy outlines the strategic framework guiding Amadeus Community Impact and its implications for Amadeus employees, teams, and units engaged in Corporate Volunteering and Donation activities. Particularly, the intent of this policy is to detail the activities that qualify as part of Amadeus Community Impact and ensure that all Charitable Donations made by Amadeus align with its framework and comply with Amadeus ethical and compliance policies, especially the Amadeus Code of Ethics and Business Conduct, and the Amadeus Anti-Bribery & Corruption Policy. Specifically, the Policy defines the strategic framework to be considered in the case of contributions, describes thematic areas, outlines the types of partnerships and collaborations that are prohibited, and details the reporting and communication processes to be followed, as well as roles and responsibilities. Finally, it describes non-compliance with the Policy and the potential consequences.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	The Policy includes a corporate contributions approval form and process to monitor and comply with the related-defined rules. Additionally, roles and responsibilities around it has been defined, as well as mechanisms for non-compliance and related consequences.
Scope or its exclusions	All Amadeus Group employees, including contractors.
Most senior level accountable for its	The Sustainability Office is the most senior level in organization that is accountable for implementation of policy.
Third-party standards or initiatives	Amadeus sustainability framework and ethical and compliance policies. UN Sustainable Development Goals.
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	This Policy is internally available to Amadeus own workforce in the Amadeus intranet and externally in the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-community-impact-and-charitable-donations-policy.pdf

Speak Up Policy

Description and objectives	Through the Speak Up Policy, Amadeus recognizes the importance of establishing a mechanism that allows Amadeus employees and any third parties to report any suspected business practices and/or conduct that could result in a breach, as an essential part of ensuring integrity, transparency and accountability. This Policy describes the channel to report certain violations of law, regulation, the CEBC or any Amadeus policies related to business practices or ethical conduct. Additionally, the protections available to reporting parties and affected persons are listed within the Policy (including the protection of personal data, confidentiality of the identity of reporting parties and any third party mentioned in a report, anonymity if Reporting Parties choose to make their report anonymously and guarantees against retaliation). Finally, the report management process is described.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>

Process for monitoring	Corporate Compliance and Investigations owns this Policy and periodically informs the Audit Committee about complaints received through the Speak Up Channel. The effectiveness of this Program is tested by Group Internal Audit on a scheduled basis
Scope or its exclusions	The Policy is applicable to Amadeus Group 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
Most senior level accountable for its implementation	Corporate Compliance and Investigations owns this Policy. This unit 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
Third-party standards or initiatives	Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law Highest standards of business ethics, including complying with all laws, rules, and regulations. Applicable data protection legislation by protecting the privacy of personal data it collects and processes.
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	Publicly available at https://corporate.amadeus.com/documents/en/corporate-sustainability/report/speak-up.pdf

Outpayce

In addition to the internal rules described above⁹², due to the nature of Outpayce and the regulated nature of its business, this Amadeus company has incorporated and/or adapted a set of internal mandatory rules. Thus, Outpayce, as an electronic money institution, aims to prevent and mitigate risks specially associated to the sector in which the company operates⁹³.

It is particularly important to highlight the internal manual related to anti-money laundering and counter-terrorism financing (hereafter, AML/CTF), approved by the Outpayce's governance body, to fully comply with applicable laws and regulations and the effective and prudent management of its anti-money laundering and counter-terrorism financing related risks.

This manual specifies the internal governance arrangements, processes, and monitoring mechanisms that Outpayce implements in this regard. Additionally, it serves as a practical guide and supporting material providing detailed information and exemplary practices on AML/CTF obligations in the areas of risk assessment, due diligence, information reporting, record keeping, internal monitoring and compliance management.

The manual is binding on all the Outpayce's contractors and permanent or temporary employees, including members of management and other senior management, regardless of their location, position or seniority.

Finally, it is available to all employees, managers, and agents of Outpayce at any time in the internal platform.

Actions to develop, promote and evaluate its corporate culture

Amadeus enhances its compliance actions and rely on building and maintaining a common understanding of how the Group expects business to be conducted with stakeholders.

As mentioned before, through the Corporate Compliance Program, the company aims to prevent, find, and fix ethical and regulatory problems, and protect the interests of the company. The Corporate Compliance Program is structured around four main areas: the Corporate crime prevention and governance, training and awareness, third-party due diligence and Speak Up related investigations. Additionally, Amadeus implements other ongoing initiatives to promote compliance

⁹² As part of the company, Amadeus corporate policies and practices apply to Outpayce.

⁹³ Particularly, but not limited, those related to fraud, compliance and conduct, money laundering, third parties or fiduciary-risks.

with the highest standards of corporate compliance and business ethics (see more details in the sections below).

Key actions to develop, promote and evaluate its corporate culture¹

Corporate crime prevention and governance	
Scope	Amadeus Group
Description	Amadeus runs a Corporate Crime Prevention Program for the prevention of the commission of crimes and irregularities. Particularly, this corporate crime prevention program aims to monitoring extensive corporate crime and corruption-related risks as defined in the Spanish Criminal Code, such as those related to fraud, corruption, intellectual property, privacy, security or investor and employee protection, ensuring appropriate controls are in place to detect and prevent them. Hence, the main objective is: • Be aware of the overall regulatory framework governing its operations; • Implement the necessary steps and procedures for the company to comply with current applicable legislation; • Fully respect the obligations and commitments assumed in its contractual relationships with third parties; • Respect the general principles of risk management for the prevention of crimes included in the Corporate Crime Prevention Manual and; • Comply, and take required or advisable steps in order for executives and staff in the company to comply with the internal ethical principles. In this regard, Amadeus has conducted an extensive review of relevant events and performed a risk assessment and overhaul of associated controls to further strengthen the Corporate Crime Prevention Program. This Program is audited by Group Internal Audit on a scheduled basis, with the next testing expected to occur in 2025. Additionally, the Audit Committee receives regular updates on corporate compliance, including corporate policies relating to bribery and corruption, the corporate Crime Prevention Program, fraud.
Risk-based compliance due diligence ²	
Scope	Third parties (vendors and business partners)
Description	Eligible third parties undergo a risk-based compliance due diligence as part of a broader due diligence process. The compliance analysis covers: • International sanctions, • Adverse media (regulatory; competitive/financial; environment/production; social/labor), • Other regulatory sanctions, • Politically exposed persons; special interest persons; relatives and close associates; Board memberships, • Country risk, • Other service-related and contractual risks, including contact with government officials, payment methods and potential conflicts of interest. Depending on the risks identified, Corporate Compliance and Investigations will propose specific mitigation actions, ultimately ensuring that suitable compliance and business ethics standards are applied.
Training and awareness	
Scope	All employees at Amadeus Group and distributors
Description	Amadeus provides ongoing training and communication to employees worldwide to ensure understanding and adherence to the CEBC and other compliance rules. To do so, Corporate Compliance and Investigations designs and delivers global mandatory compliance and business ethics training for the whole workforce, mandatory every two years covering a broad spectrum of topics: • Obligations to the team (acting with respect; including everyone) • Commitments to others (avoiding insider trading) • Doing business the right way (gifts and entertainment) • Never bribe • Competing fairly • International trade laws • Avoiding conflicts of interest • Safeguarding the reputation and financial integrity (fraud; keeping accurate records) Additionally, a mandatory global module regarding preventing discrimination and harassment in the workplace has been also launched, including additional reinforced training time for all managers and above. Finally, it is important to mention that a specific mandatory course in anti-money laundering is launched to Outpayce employees on an annual basis to equip them with the skills to identify, react and report potential money laundering, terrorist financing and other serious organized criminal activities, ensuring compliance with AML/CTF regulations.

Key actions to develop, promote and evaluate its corporate culture¹

Adherence in to the CEBC and the compliance internal rules	
Scope	All employees at Amadeus Group
Description	All employees must read, comply and understanding the Amadeus CEBC, Anti-Bribery and Anti-Corruption Policy, the Community Impact and Charitable Donations Policy and the Political Contributions Policy.

¹Information about the Amadeus Speak Up Channel is provided in the section below. Additionally, information about the description of the procedures and actions in place to prevent, detect and address allegations or incidents of corruption and bribery are detailed in section G1-3 - *Prevention and detection of corruption and bribery*

² More details about the due diligence process has been included in sections G1-2 - *Management of relationships with suppliers* and G1-3 - *Prevention and detection of corruption and bribery*

Regarding the resources allocated, each of these actions do not surpass individually the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements

Amadeus Speak Up channel and investigations⁹⁴

The Speak Up Channel allows employees and stakeholders, anonymously if desired, to safely submit an inquiry or to report suspected issues that may contravene laws, regulations or business practices or that may constitute unethical conduct that could result in a breach of the Code of Ethics and Business Conduct.

The system is accessible 24/7 in four languages (English, Spanish, French and German), and can be accessed from Amadeus' intranet, Amadeus' websites and by telephone. It is hosted by an independent third-party provider of whistleblower solutions and certified to safeguard maximum confidentiality, security and privacy standards are applied. Furthermore, the Speak Up Channel and its effectiveness are subject to regular internal and external audits, guaranteeing users confidentiality and anonymity.

All communications received through the Speak Up Channel are confidential and investigated with the utmost diligence by a dedicated team of investigators who periodically receives specific training on issues related to investigations and are Certified Fraud Examiners by the Association of Certified Fraud Examiners.

Particularly, confidentiality is secured by the third party provider by encrypting and storing the information in a separate secured environment. A reporting party can make a report anonymously by setting up a "secured mailbox" at the time of filing their report.

Amadeus takes care to avoid any potential conflicts of interest (if the report is against Corporate Compliance and Investigations it will be automatically routed to Group Internal Audit) and secures the presumption of innocence of anyone mentioned in the report⁹⁵.

Retaliation against anyone reporting their concerns in good faith is strictly prohibited and will subject the person threatening retaliation to appropriate disciplinary action, up to and including dismissal or judicial action⁹⁶.

If after an investigation a breach is proven, the company will take disciplinary measures where appropriate, and consider corrective measures to prevent potential infringements from recurring in the future.

⁹⁴ The Speak Up Channel is available at <https://amadeus.com/en/speak-up-channel>.

⁹⁵ Amadeus has Investigation Protocols in place securing consistency and objectivity in the investigation process.

⁹⁶ 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.

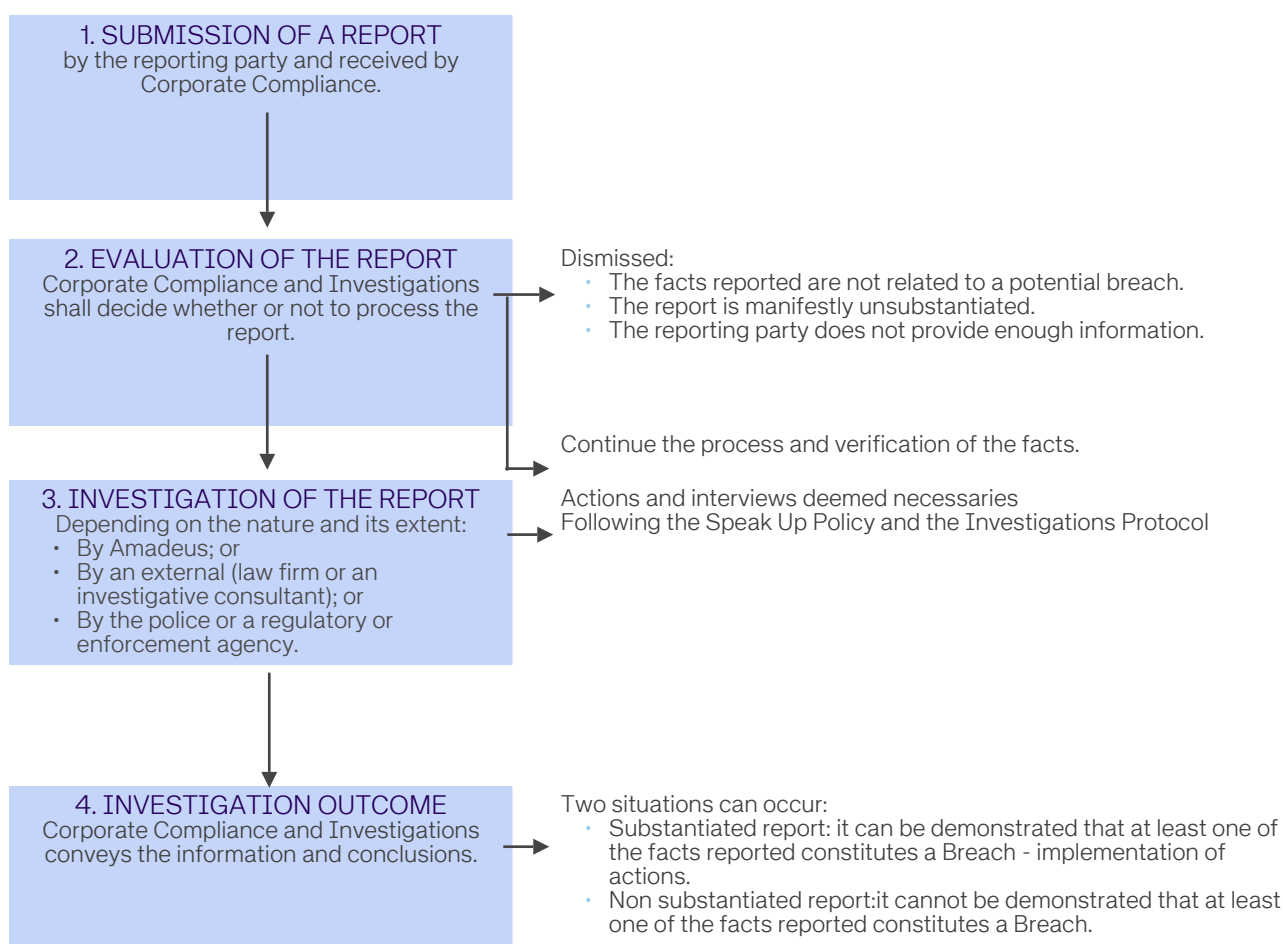
The Group provides information on the Speak Up channel to employees via a dedicated intranet page and through particular training program. Particularly, a detailed module on Speak Up Channel is always included as part of the mandatory bi-annual training on CEBC.

The Audit Committee is responsible for supervising the functioning of the Speak Up Channel. See more related information in section *ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies related to business conduct*.

The regulation governing the Speak Up Channel is the Speak Up Policy, which has been approved by the Board of Directors and translated into 12 EU languages (see more information about the Speak Up Policy in section above).

Beyond the procedures to follow-up on reports by whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937, Amadeus does not have specific procedures to investigate business conduct incidents, including incidents of corruption and bribery.

Management Process to report and investigate complaints



Risk in respect of corruption and bribery

Given the numerous jurisdictions in which Amadeus conducts business, the company has established policies, procedures, and internal controls to reduce the risks related to corruption and bribery. These measures are crucial in maintaining compliance with international regulations and safeguarding the company's reputation. The Amadeus business units are at most risk in respect of

corruption and bribery are typically those that have frequent interactions with external parties such as customers, especially if they are state owned, partners, and suppliers⁹⁷.

To address these risks, Amadeus has implemented several key strategies. Enhanced due diligence is conducted to thoroughly vet potential partners and suppliers, ensuring they adhere to ethical standards and legal requirements. Regular training and awareness programs are provided for employees to educate them on the importance of ethical behavior and the consequences of corruption and bribery. Additionally, Amadeus has introduced a gift and entertainment register where employees must log any gifts and entertainment invitations received from or given to suppliers, customers or any third party as a control measure. Conflicts of interest must also be disclosed and approved using corporate tools dedicated for this purpose (see further details in section G1-3 - *Prevention and detection of corruption and bribery*).

Key targets-Corporate culture

Code of Ethics and Business Conduct training

Target	More than 90% of staff trained by 2024 and more than 95% by 2025.
Scope	Employees at Amadeus Group
Baseline value and base year	83% in 2023
Performance against target	94.6% in 2024.

G1-2 - Management of relationships with suppliers⁹⁸

Amadeus' approach to supply chain is embodied in a set of policies on responsible purchasing, reflecting the Group's commitment to uphold sustainability standards in procurement practices and reduce risks related to third parties. The Company extends to Amadeus Group third parties who work for their environmental, social and governance principles.

Key policies - Relationships with suppliers

Code of Ethics and Business Conduct for Third Parties (hereinafter, CEBC-T)

Description and objectives	The CEBC-T applies to Amadeus third parties who work or provide any kind of product, service or goods to Amadeus, including but not limited to business partners, vendors, consultants, agents. As part of Amadeus' commitment to act with integrity, the CEBC-T outlines the minimum ethical standards expected from Third Parties, such as business ethics, governance, social and environmental commitments. This includes: human rights, labor rights and non-discrimination, fair treatment of people with respect and dignity in accordance with internationally recognized standards regarding working conditions, the dignified treatment of employees, child and forced labor, anti-bribery, corruption and conflicts of interest. Third parties of Amadeus must act in strict compliance with all appropriate laws and regulations in all countries and jurisdictions in which they operate.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	Amadeus may update the Code of Ethics and Business Conduct for Third Parties from time to time, and Suppliers will comply with the latest version of this policy.
Scope or its exclusions	Amadeus third parties who work or provide any kind of product, service or goods to Amadeus, including but not limited to business partners, vendors, consultants, agents.

⁹⁷ Functions -at-risk means those functions deemed to be at risk of corruption and bribery as a result of its tasks and responsibilities.

⁹⁸ The material associated IRO reflects the positive impact linked to the implementation and reinforcement of sustainability practices among suppliers, through its purchasing policies and procedures. Additionally, a material risk related to potential breaches of internal rules has been identified (see section above as well).

Most senior level accountable for its implementation	The CEBC-T has been approved by the Chief Risk and Compliance Officer at Amadeus and the Group Purchasing Department implements this Policy with vendors. Legal department also ensures adherence for eligible third parties contractually.
Third-party standards or initiatives	Laws and regulations pertaining to health and safety, labor, human rights and discrimination, insider trading, taxation, data privacy, competition and anti-trust, the environment, public tenders, and anti-bribery, among others. Ethical standards.
Interests of key stakeholders	Amadeus periodically assesses the adequacy of its policies including the scope and key stakeholders.
Availability	The CEBC-T is publicly available to stakeholders in the Amadeus website: https://corporate.amadeus.com/en/resources/vendor-information/amadeus-code-of-ethics-and-business-conduct-for-suppliers

Human Rights Policy

Description and objectives	The purpose of the Human Rights Policy is to reaffirm Amadeus' commitment to respect and promote human rights in its operations and supply chain. The Human Rights Policy, based on the main internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights, reflects the Amadeus' commitment to the respect and promotion of human rights -including business integrity and ethical principles- not only in all its operations, but also in its relations with vendors, contractors and business partners who work for, or provide any kind of product, service or goods to, Amadeus. This Policy embraces among other: • Commitments to value chain employees, including ensuring fair and favorable working conditions, fair wages, freedom of association/collective bargaining, promotion of the diversity, inclusion and non discrimination, health and safety conditions, respectful for migrant workers, promotion of freedom of expression. • Commitment to society and local communities, protecting minority and community rights, a clean, healthy and sustainable environment, and fighting against corruption and bribery. As indicated in the Human Rights Policy and in section <i>S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages</i>, the Group employs zero tolerance towards child labor, abuse and exploitation throughout its operations and value chain and seek to adequate remediate insofar as such maltreatment is discovered.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	The Board of Directors, through the Audit Committee, is the governing body in charge of overseeing the compliance with the Company's policies and rules in the environmental, social and corporate governance area and receiving assurances from Management that the Company's environmental and social practices are in accordance with the established strategy and policy.
Scope or its exclusions	Amadeus IT Group S.A. and all Amadeus Group companies where the Company owns or controls, directly or indirectly, most of the shares; as well as any other nonfully owned Amadeus companies or joint venture that have agreed to be bound by this Policy. Additionally, the Policy applies to to eligible Amadeus Group third parties who work for, or provide any kind of product, service or goods to, Amadeus, including but not limited to business partners, vendors, consultants, agents.
Most senior level accountable for its implementation	The ESG Steering Committee is in charge of the approval of this Policy and acts as delegated body of the Executive Committee – that will act as final validator of decisions – for sustainability and, in particular, human rights matters. The Sustainability (ESG) Office and Sustainability (ESG) Steering Committee have the responsibility for adhering to these commitments as well as for overseeing their implementation and help to ensure that any breaches are reported through the Speak Up channel and investigated by the Corporate Compliance and Investigations.
Third-party standards or initiatives	Main internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights.
Interests of key stakeholders	Through internal responsible experts at corporate level who had knowledge of interests of the stakeholders
Availability	Available internally through the intranet and externally at the Amadeus website: https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-human-rights-policy.pdf

Amadeus Group purchasing policy

Description and objectives	The Amadeus Group purchasing policy applies to Amadeus companies that are majority owned by Amadeus. The objective of this policy is to rule the process to purchase any good or outsource any service in Amadeus. The company expects that suppliers shall be guided by the highest ethical standards and shall be firmly committed to excellence in the fields of compliance, corporate governance, and sustainability. The Group should avoid relationships with vendors who cannot fulfil among others, the following principles: • Respect the human rights of employees - including the right of employees to freedom of association-, never treat employees in an inhuman manner or allow discrimination practices, and prevent forced labor, child labor and unfair low-wage labor. • Demonstrate ability and willingness to comply with environmental obligations, prioritize goods which are produced in an eco-friendly way and can be disposed in an environmental responsible way. • Observe all related laws and international rules, and ensure fair transactions and prevent corruption • Create and maintain healthy and safe work conditions and environment for their employees.
Related material IROs	See section above <i>ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct</i>
Process for monitoring	The Policy is revised and supplemented, as required, to meet new needs and conditions.
Scope or its exclusions	Applicable to all Amadeus companies that are majority owned by Amadeus
Most senior level accountable for its implementation	The Group Purchasing department is the most senior level in Amadeus accountable for the implementation of the Policy
Third-party standards or initiatives	Highest ethical standards.
Interests of key stakeholders	The group purchasing policy promotes fair and transparent purchasing process including the vendors and Amadeus internal stakeholders.
Availability	The Amadeus Group purchasing policy is available for Amadeus employees in the intranet.

Policy to prevent late payment

Amadeus supports fair payment practices. The company' standard payment practice is to pay invoices within forty-five days⁹⁹. Hence, unless otherwise specified in the Purchase Order, invoices will be issued monthly, and payment will be made within forty-five (45) days upon receipt of the invoice. This 45 days rule can vary depending on the legal requirements of the countries. If the legal terms of payments in the country are lower than 45 days, the legal terms should apply.

Incorporation of sustainability principles in procurement practices

The Group aims to incorporate and leverage sustainability practices in its upstream value chain, fostering a positive indirect impact, through various ongoing actions and initiatives. Amadeus collaborates with partners, expecting them to actively participate in risk assessments and improving their adherence to Amadeus' social, environmental, and ethical expectations. Additionally, sustainability criteria are considered in the procurement process (see table below *Key actions - Sustainability principles in procurement practices*).

To assesses their effectiveness, those actions included in the ESG Ambition are periodically tracked between the Sustainability Office and the procurement department (actions ISO 20400 certification and vendor risk assessment, included in the table below). Additionally, an update is presented to the ESG Steering Committee, when applicable.

⁹⁹ This is applicable to Amadeus companies. The Policy recognizes that payment terms could vary depending on the special needs of the country, however should be applied whenever possible

Key actions - Incorporation of sustainability principles in procurement practices

Adherence to the CEBC for third parties	
Scope	Suppliers at Amadeus Group
Description	Vendors for the Group must explicitly adhere in writing to the Amadeus CEBC for third parties. If any of those vendors have their own documented CEBC in place (which Amadeus has the right to ask for and/or audit) and it is demonstrated that their own CEBC is at least as strict as the Amadeus one, it will be accepted that they adhere to their own CEBC, but this must be confirmed in writing. If a vendor disagrees with this wording, it is their responsibility to explicitly state if they are not adhering to CEBC for third parties, along with the reasons. In such cases, the Purchasing Department together with Corporate Compliance and Investigations will decide how to proceed. This way, Amadeus' vendors comply with sustainability related rules, reducing the risk of non-compliance and fostering positive impacts.
ISO 20400 certification	
Scope	Amadeus Group
Description	Amadeus has been awarded the ISO 20400 certification by IFPSM (International Federation of Purchasing and Supply Management) and AERCE (the Spanish Association of Purchasing, Contracting, and Supply Professionals). This achievement underscores the Company's steadfast commitment to promoting sustainable procurement practices and integrating sustainability principles into its supply chain.
Vendor risk management process	
Scope	Suppliers at Amadeus Group
Description	Amadeus must assess a third party's suitability for delivering products or services prior to entering into any contract or collaboration agreement. As part of this risk assessment, a due diligence questionnaire containing sustainability questions may be sent to the vendor. As a result of this risk assessment, vendors are classified from low to very -high risk levels. Through the vendor risk management process, Amadeus engages with suppliers to have a responsible supply chain throughout its global operations.
Third Party Compliance Due Diligence	
Scope	Third parties across Amadeus -including vendors- classified as medium or high risk in Dow Jones' database
Description	For those third parties classified as medium or high risk during the vendor onboarding process, Amadeus carries out a third-party Compliance due diligence assessment, including sustainability-related questions: - Medium risk - internal due diligence, a simple assessment that requires Amadeus to document how the Company will address this level of risk raised during the Onboarding and the Risk Assessment phases. - High risk - external due diligence. Amadeus engages with the third party to provide assurance to mitigate the high risks previously identified, through a questionnaire, including sustainability matters. After assessing the third party's responses, it is decided whether and how the risks can be mitigated. That could also led to the implementation of remediation plans.
Contractual clauses	
Scope	Suppliers at Amadeus Group
Description	The Amadeus Terms and Conditions of Purchase apply when referred to in a purchase order (or similar document), unless Amadeus and the supplier have entered into a separate agreement. These terms and conditions refer to additional policies and requirements that suppliers must comply with, or that are agreed between Amadeus and the supplier in a separate agreement. They also include specific clauses relating to labour and sustainable development. Among others, these clauses state that eligible providers -and their subcontractors- must fulfil all obligations towards its employees under the relevant jurisdiction, including payment of wages (not less than minimum wage), social security, employment related taxes etc. Additionally, providers are required to adhere to applicable laws on health and safety, working conditions, and the environment -rules and regulations on restriction of hazardous substances, electrical waste and electronic equipment-. Through these clauses, the Company incorporates social and environmental criteria for contracting vendors services.

Regarding the resources allocated, each of these actions do not surpass individually the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements.

Key targets- Sustainability principles in procurement practices

Evaluation of vendors ESG risks	
Target	>70% of vendors spend evaluated
Scope	Suppliers at Amadeus Group
Baseline value and base year	0% in 2023 ¹
Performance against target	27% of vendors spend evaluated

¹ To this purpose, a new ESG risks evaluation method has been created, and put in place first time in 2024. This is why for the baseline value 0% is considered.

G1-3 - Prevention and detection of corruption and bribery¹⁰⁰

Amadeus has a zero-tolerance approach to bribery and corruption and is fully committed to conducting activities ethically¹⁰¹. This includes complying with obligations under international anti-corruption laws, including but not limited to: Law 10/1995 of the Criminal Code of Spain, The Anti-Corruption Act 2007 of France, the Criminal Code and the Act on Combating International Bribery 1997 of Germany, the Bribery Act 2010 of the UK and the Foreign Corrupt Practices Act ("FCPA") of the U.S.A.

The detection, prevention and punishment of fraudulent acts or crimes are priorities for the Group. These commitments guide the Amadeus corporate policies related to the prevention of illegal activities such as bribery and corruption¹⁰², and are materialized through a set of prevention, detection and mitigation initiatives and processes. Particularly, as indicated in section *G1-1 - Business conduct policies and corporate culture*, the policy is available to stakeholders at the Amadeus website¹⁰³.

¹⁰⁰ The material associated IRO reflects the risk related to potential breaches of internal rules has been identified (see section above as well).

¹⁰¹ Promising, authorizing, offering, giving, accepting or soliciting anything of value, or any advantage, to anyone, with the intention or appearance of improperly influencing his or her decisions or conduct, or as reward for improper performance, is strictly prohibited to employees.

¹⁰² As well as money laundering, as applicable to Outpayce. See section above *G1-1 - Business conduct policies and corporate culture*

¹⁰³ <https://corporate.amadeus.com/documents/en/corporate-sustainability/report/amadeus-abc-policy.pdf>

Key actions related to related to corruption and bribery

Corruption and bribery prevention measures

Scope	Amadeus Group
Description	Amadeus has implemented prevention measures such as: • The Corporate Crime Prevention Program covers two particular crimes related to bribery and corruption. Under this framework, related controls and mitigation actions are established. • The implementation of the Company's internal regulations and policies, particularly those related to anti-corruption and anti-bribery is crucial. In this regard, units in Amadeus must ensure compliance. • Additionally, Amadeus has established clear definitions to help identify bribery or corruption issues and how to proceed in such hypothetical situations (these are easily accessible to all involved in the corporate rules and procedures). For instance, the Anti-bribery and Anti-corruption Policy defines bribery and what is illegal and prohibited, including facilitation payments. Definitions are also outlined for gifts and entertainment, along with rules for gifts and entertainment, including those related to third-party sponsored events. • The implementation of a Gifts and Entertainment Register. Certain categories must be registered when offered to or received by any third party, for clearance by Corporate Compliance and Investigations unit. Post-expense reimbursement financial controls have also been designed to ensure maximum effectiveness and widespread use. • A corporate contribution approval process is established, including minimum criteria for recipient organizations before charitable and political contributions are made. The proposed recipient must be vetted using the company's compliance tool for third-party compliance (see due diligence process below). • Risk-based compliance due diligence as part of a broader due diligence process for third parties (see also section G1-2 - <i>Management of relationships with suppliers</i>). This due diligence process covers corruption and bribery related risks. • Particular contractual clauses or commitments to uphold anti-bribery and corruption standards are included in third-party agreements. • All Amadeus employees must read and comply with the Amadeus Anti-Bribery and Anti-Corruption Policy, the Code of Ethics and Business Conduct, the Charitable Contributions Policy and the Political Contributions Policy. • Global mandatory compliance and business ethics training for the entire workforce covers topics such as anti-corruption and anti-bribery (see section G1-1 - <i>Business conduct policies and corporate culture</i> for more details, and section below Anti-corruption or anti-bribery training programs).

Corruption and bribery detection measures.

Scope	Amadeus Group
Description	As previously mentioned, Amadeus provides stakeholders with the Speak Up Channel as a tool to report and safely submit, anonymously if desired, an inquiry or a suspected issues that may contravene laws, regulations or business practices relating to, among others, corruption, bribery or fraud. Therefore, the Group may detect incidents of corruption or bribery. Additionally, through the annual review carried out by the Group Internal Audit, potential related incidents could be detected, as well. Information about the Speak Up Channel, investigators or investigating committee is included in section Amadeus Speak Up channel. In this regard, it is important to highlight that the Amadeus Speak Up Policy secures that any conflicts of interest during the investigation process is avoided. Furthermore, Amadeus has Investigation Protocols in place that guarantee consistency and objectivity.

Corruption and bribery mitigation measures.

Scope	Amadeus Group
Description	Consequences have been established within the Company in case engaging in bribery and corruption issues are confirmed. If this is the case, any failure to comply will be treated seriously and may result in disciplinary action including termination of employment and criminal charges¹.

¹Individuals who are found guilty of bribery and/or corruption face very serious legal consequences, including criminal proceedings, sanctions such as fines and/or imprisonment, extradition, or disqualification to act as a corporate officer or director. Further, being found guilty of bribery will often carry other criminal charges, such as money laundering or tax fraud.

Regarding the process to report outcomes, investigation reports with recommended actions are distributed to the management of affected areas. Additionally, the Chief Risk and Compliance Officer reports annually to the Audit Committee figures regarding reports.

Outpayce

In addition to the prevention and detection of corruption and bribery acts described above, due to the nature of Outpayce and the regulated nature of its business, this Amadeus company has incorporated an additional set of internal procedures to fight against corruption and bribery. In particular, the entity has implemented robust fraud prevention, sanctions compliance and transaction monitoring procedures to promote the highest level of compliance with applicable regulations. Additionally, Outpayce follows a strict process for submitting Suspicious Activity Reports (SARs) to the relevant authorities, ensuring prompt communication in cases of identified risks or breaches.

Anti-corruption or anti-bribery training programs

Amadeus provides mandatory anti-corruption and anti-bribery training for employees through online course.

During the period from January 1, 2024 to January 31, 2024, 94.6% of the employees, including those at-risk functions, have completed a mandatory module on this topic, as part as the global mandatory compliance and business ethics training. The Amadeus Management -members of the Executive Committee- are trained as are other employees, through this bi-annual mandatory training¹⁰⁴.

For its part, in 2024 the Board of Directors have not received a specific training on these matters.

Details of the training during the year is as follow:

Anti-corruption or anti-bribery training

	As of December 31, 2024		
	At-risk functions	Managers ¹	Other own workers ²
Training coverage			
Total number of employees (headcount) ³	20,643	7,361	—
Total receiving training	19,536	6,981	—
Delivery method and duration⁴			
Classroom training (h)	—	—	—
Computer-based training (h)	1	1	—
Voluntary computer-based training (h)	—	—	—
Frequency			
How often training is required	Bi-annually	Bi-annually	Bi-annually
Topics covered			
Definition of corruption	■	■	—
Policy	■	■	—
Procedures on suspicion/detection	■	■	—

¹ Managers are included in the total at-risk functions as well. Managers and above at Amadeus are considered to calculate these figures.

² At Amadeus, employees are seen as being in risk functions, so that's why no employees are included here

³ Total number of employees as disclosed in section S1-6 - Characteristics of the employees.

⁴ Employees access to the course through the Group Ordinary System (Workday). Data is registered in this internal system as well.

¹⁰⁴ Where necessary, Amadeus may provide risk-based training to at-risk functions.

G1-4 - Confirmed incidents of corruption and bribery

No confirming incidents relating to corruption or bribery were reported in 2024. Consequently, no workers were dismissed or disciplined for corruption or bribery-related incidents, neither contract with business partners were terminated or not renewed due to violations in this regard.

Additionally, Amadeus did not receive any convictions or fines for violation of anti-corruption or anti-bribery laws, nor has it been the subject of any legal actions relating to corruption or bribery in 2024.

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G1-5 - Political influence and lobbying activities¹⁰⁵

Amadeus actively and transparently participates in public policy dialogues to explain both Amadeus' and customers' perspectives about the travel industry and ideas about improving the policy frameworks that govern it. The Group engages with stakeholders in many jurisdictions to help them better understand Amadeus' industry and business with the ultimate aim of contributing to shape new regulatory outcomes, granting access to important information, mitigating risks and promoting collaboration.

On this matter, the Amadeus Political Contributions, Lobbying, and Government Engagement Policy¹⁰⁶ defines the Amadeus rules related to political contributions, interactions with government and lobbying activities. This Policy is complemented with the Speak Up Policy, the CEBC, the Anti-Bribery and Anti-Corruption Policy, the Entertainment & Gift Policy, the Charitable Contributions Policy, the Anti-trust and Competition Policy, and the Anti-Fraud Policy (see section *G1-1 - Business conduct policies and corporate culture*).

The Policy expresses Amadeus' commitment to not make contributions to political parties or individual political office holders or candidates for office¹⁰⁷. Additionally, it establishes rules for engagement with government and regulatory bodies for the purpose of lobbying or dialogue on public policy, and to comply with laws and regulations that may apply -with regards to transparency and reporting-.

In doing so, Amadeus commits to comply with applicable laws and regulations and internal company policies. Its collaborations across the global travel industry are based on the principles of neutrality and transparency, fair competition and respect for society around the Group. Taking into consideration these principles and commitments, Amadeus has launched industry initiatives jointly with different partners, including environmental and social sustainability, regulatory and industry matters and consumer protection¹⁰⁸.

Details about the Board of Directors composition and experience have been included in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*. In this regard, it is important to mention that no members of the Board of Directors, Executive Management Group or management team of the Group have held roles in public administration or regulatory bodies in the two years prior to the 2024 reporting period.

¹⁰⁵ Responsible lobbying activities through collaborations with industry key stakeholders has been identified through the double materiality assessment as a material positive impact generated by the company.

¹⁰⁶ This Policy is applicable to all Amadeus employees, intermediaries and consultants that work on the company's behalf for lobbying purposes, was approved by the Executive Committee and Amadeus Industry Affairs unit is in charge of its supervision and administration.

The Policy is publicly available at https://amadeus.com/documents/en/pdfs/Political%20Contributions_Lobbying_Government%20Engagement%20Policy.pdf

Additionally, the Policy is accessible to employees to facilitate implementation. It is part of mandatory training for Amadeus employees and contractors.

¹⁰⁷ The only exception to this is in countries where there is a legal requirement to do so or where there is an established, lawful practice to do so. In such circumstances, any payment must be approved in advance and in writing by the SVP (Senior Vice President), the employee's Business Unit and Industry & Government Affairs. In many circumstances, political contributions may require the Amadeus Board or shareholder approval therefore, exceptions to this Policy are likely to be minimal.

¹⁰⁸ These are directly linked to the identified material IROs (see section *SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model*, for details).

European Transparency Register

Since 2014, Amadeus has been registered in the European Transparency Register, reporting periodically on its activities and the resources attributable to the activities covered by it. In this regard, the last update of the information in the Register was carried out in February 2024. Amadeus' identification number in the Register is 193056815367-44¹⁰⁹.

Additionally, Amadeus is also registered in the Deutscher Bundestag Lobby Register and in the Haute Autorité pour la Transparence de la Vie Publique¹¹⁰.

The Group is frequently asked to contribute to regulatory reviews or give input to policy initiatives. Particularly, the main EU legislative or policy proposals of interest to the Company are transport, digital and tourism, especially in areas where technology plays a key role. These are linked to the Company's fields of interest -for instance, competition, consumers, digital economy and society, environment, single market, trade, and transport are included-¹¹¹.

Particularly, in 2024, Amadeus has continued to engage with the European Commission and member states through periodic meetings, consultations and workshops.

- The Group actively promotes and shares its views jointly with other industry stakeholders to Members of Parliament (MEPs) to explain the benefits and positive impact of Multimodal Digital Mobility Services (MDMS) regulatory initiative in terms of making the transport sector smarter and more sustainable in Europe. The Company also contributes to consultations about this policy from the Friends of MDMS coalition¹¹² through our membership with EU Travel Tech.
- With the purpose of fulfilling the Digital Decade¹¹³ objectives:
 - Amadeus is a member of the European Alliance on Industrial Data, Edge and Cloud, a group of 50 companies providing a roadmap to the European Commission for the next generation of cloud technologies and sovereign data exchange solutions. Amadeus is leading the working group on data spaces.
 - Amadeus, in collaboration with other travel industry players, is leading EONA-X, the first European mobility, travel and tourism data space. During 2024 Amadeus has contributed to give visibility to the initiative to the industry and targeted public stakeholders with the aim of facilitating growth.
 - Amadeus joined two consortia appointed by the European Commission to provide a roadmap on data space mobility and data space tourism.
 - Amadeus is involved in the Important Project of Common European Interest for Next Generation Cloud Infrastructure and Services (IPCEI-CIS), sponsored by the European Commission and jointly actioned with Member States and private sector. As part of this initiative, France will fund a data exchange platform project that will power the sectorial data spaces. In Germany a project around cybersecurity will create a cloud-hosted digital twin of Amadeus' Data Center in Erding, Germany.

¹⁰⁹ In this framework, Amadeus has signed the code of conduct of the Transparency Register, which is mandatory in order to be registered in it and govern how interest representatives should interact with the EU institutions. As included in the website, the estimate of annual costs related to activities covered by the register are between €900,000 - €999,999.

¹¹⁰ <https://www.hatvp.fr/fiche-organisation/?organisation=344496252>

¹¹¹ https://www.lobbyregister.bundestag.de/suche/R004965/32086?backUrl=%2Fsuche%3Fq%3Damadeus%26pageSize%3D25%26filter%255Bactive%255D%255Btrue%255D%3Dtrue%26sort%3DRELEVANCE_DESC

¹¹² These are directly linked to the identified material IROs (see section SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, for details).

¹¹³ Coalition formed by EU Travel Tech, ALLRAIL, BEUC, BT4Europe, the European Travel Agents' and Tour Operators' Associations (ECTAA), the European Passenger's Federation (EPF), Europe on Rail, the Global Business Travel Association (GBTA), Mofair and Transport & Environment (T&E).

¹¹⁴ European Commission. "Europe's Digital Decade: digital targets for 2030."

- As part of involvement in the EU Digital Identity Wallet Consortium, Amadeus is particularly active in the work stream on travel and tourism.

Engaging public and private sector and trade industry stakeholders

Through engagement, Amadeus may support growth and address industry and sector specific challenges. At an industry level, Amadeus engages with selected players in many areas, including the digital, transport, travel and tourism arenas, to work toward common public policy goals.

In this regard, Amadeus is indirectly represented through its membership of the EU Travel Tech (EUTT), the US Travel Technology Association (TravelTech) and Technology Industry Association (ATTIA) in Asia¹¹⁴. In 2024 these associations engaged in the following activities:

- In Europe, EUTT has been particularly active in engaging on key issues relating to ensuring a competitive, transparent travel sector for EU consumers; overcoming a fragmented single EU market; and making the travel and tourism industry more sustainable.
- In North America, TravelTech has advocated for policies and sound regulations that promote information transparency and consumer choice, emphasizing the indirect channel's critical role in the entire travel ecosystem.
- In Asia, ATTIA has maintained a focus on initiatives that promote collaboration and information-sharing for the development of aligned industry and government priorities and vision for travel and tourism in Asia-Pacific.

Globally, Amadeus is among the founders of a newly created industry coalition, Global Travel Tech, which intends to promote the travel technology industry agenda and participate in relevant global policy-making discussions on the future of the industry.

At consumer level, the Friends of MDMS coalition, which includes consumer associations BEUC and EPF among others, works to promote transparency in travel distribution and the transport market, to make it easier for travelers to compare and combine travel options, including more sustainable options.

The travel agency community is also a key partner for Amadeus in advocating and supporting transparency, fair competition and the development of a sustainable travel and tourism sector. Amadeus collaborates closely with the World Travel Agents Associations Alliance (WTAAA), with the European Travel Agents' and Tour Operators' Associations (ECTAA) and the American Society of Travel Advisors (ASTA) being the most important members. The Company also partners directly with travel agency associations at both regional and national level worldwide.

Aimed at sharing and disseminating exemplary practices, other associations in which Amadeus participates include:

- The World Travel and Tourism Council, a globally recognized private sector platform from which Amadeus advocates jointly with other industry stakeholders on issues of common interest affecting the travel and tourism sector.
- The World Tourism Organization (UN Tourism) of which Amadeus is an affiliate member and strategic technology partner. During 2024, as part of collaborative effort to promote digital transformation, innovation, and investment perspectives in the tourism industry, Amadeus and UN Tourism launched a quarterly report, *Travel Insights 2024: Focus on the Americas*. The report draws on Amadeus' global travel data to provide a comprehensive overview of forward-looking travel industry insights. This helps destinations and travel service providers better comprehend travel performance and insights into travelers seeking to travel to the

¹¹⁴ ETTSA, TravelTech and ATTIA represent the indirect distribution industry on regulatory and industry matters in the EU, US and Asia, respectively.

region, and to anticipate shifts in traveler patterns and trends. This enables them to create strategies that capture more traveler interest to support tourism and economic growth for their destination.

Finally, it is important to mention that the company has also voluntarily joined various initiatives that strengthen its commitment to sustainability, notably, Travalyst and the United Nations Global Compact.

Financial or in-kind contributions

Amadeus does not provide financial funding nor in-kind contributions to political parties. This commitment is expressly included in the CEBC, the Anti-Bribery and Anti-Corruption Policy and the Political Contributions, Lobbying, and Government Engagement Policy.

It is important to highlight that the Group only makes charitable contributions that comply with local laws and ethical standards. These contributions must follow the approval process describe in the Policy (see section *G1-1 - Business conduct policies and corporate culture* for more details).

Fair competition¹¹⁵

Having an international presence, compliance with antitrust and competition laws applicable in the countries and industries in which Amadeus operates shall be safeguarded. Failure to comply could generate legal, financial and reputational effects.

Consequently, the Group considers compliance with applicable antitrust or competition laws and the maintenance of high ethical standards to be among the company's highest priorities, as reflected in the Antitrust and Competition Policy. This document is designed to set forth the general principles of antitrust and competition laws that apply to Amadeus globally and to help Amadeus employees understand how these affect their day-to-day work to comply with competition law.

Competition laws ensure that businesses play fair in the market. They aim to protect healthy competition, bringing consumers better products, more choices, and lower prices. The Policy is designed to translate these objectives into clear guidance for Amadeus employees for their day-to-day activities, for specific commercial practices such as exclusive dealings, and for any interactions with customers, suppliers, partners, trade associations and competitors.

The Antitrust and Competition Policy applies to all Amadeus group employees, agents, consultants and sub-contractors working on behalf of Amadeus worldwide and it is available in the Amadeus' intranet. A summary is available on Amadeus' public website¹¹⁶.

The Regulatory Affairs Unit at Amadeus is responsible for maintaining this policy and approving any changes to it. Additionally, all individuals subject to this policy must promptly report any suspected violation of this matter.

Beside the Antitrust and Competition Policy, the Amadeus CEBC shows Amadeus is fully committed to complete and strict compliance with applicable laws and regulations in the countries and jurisdictions in which we operate, including competition and anti-trust. This obligation is extended to suppliers through the Amadeus CEBC for third parties¹¹⁷.

Additionally, the CEBC establishes that employees should never communicate or enter into any agreement or understanding – whether formally, informally, or hypothetically – with a competitor regarding a competitive matter, including discussing pricing, functionality, marketing programs, or

¹¹⁵ Encouraging fair competition is a positive impact generated by the company and identified in the double materiality assessment. Additionally, the regulatory risks relating to anti-competitive practices has been identified as material as well.

¹¹⁶ <https://corporate.amadeus.com/documents/en/investors/2021/corporate-governance/competition-policy-for-publication.pdf>

¹¹⁷ See further information about the CEBC in section *G1-1 - Business conduct policies and corporate culture*. Details about the CEBCS is available in *G1-2 - Management of relationships with suppliers*.

service features except where the matter has been explicitly discussed with, and approved in advance by, the Group's Corporate & Legal Affairs Department.

Finally, antitrust and competition laws are also included in Amadeus' Corporate Crime Prevention program as described above, which applies strict controls to avoid any infringement of applicable competition laws.

EU Code of Conduct for CRSs

In addition to competition or antitrust laws, the EU Code of Conduct for Computer Reservation System (CRS) (Regulation (EU) No. 80/2009) prescribes certain rules for dealing with airlines, railway companies and travel agencies that are intended to ensure fair competition. This Code is currently under review by the EU Commission. Amadeus, jointly with its partners and trade associations, continues to work with the European Commission, the European Parliament and the EU Member States toward policies that promote fair competition, consumer protection and sustainable travel.

Training and awareness in antitrust and competition law compliance

Amadeus employees at different levels are responsible for being familiar with and avoiding anticompetitive activities. Employees must recognize anticompetitive practices and behaviors that may fall into questionable or even illegal territory, avoid such practices and report any concerns.

The Antitrust and Competition Policy includes definitions, guidelines and exemplary practices in antitrust matters, including a lists of "dos" and "don'ts" for dealing with third parties. It enables Amadeus employees to prevent, detect and react to conduct likely to be anticompetitive or generate liability for the company and/or affect its reputation. The Corporate & Legal Affairs department frequently organizes training sessions to remind employees of the Policy and explain the obligations and exemplary practices.

Additionally, during 2024, Amadeus has launched an e-learning course in Antitrust and Competition Law Compliance¹¹⁸. This training explains the relevant antitrust laws and how they apply to Amadeus, and provides guidance on how to spot potential competition issues specific to Amadeus's business. Consequently, Amadeus tries to prevent hypothetical risks related to failure to comply with antitrust and competition laws.

The course is open to all Amadeus employees, but is highly recommended for all employees who work in strategy, commercial, marketing, pricing, legal and finance departments or may have interactions with customers, suppliers, partners, trade associations or competitors.

Reporting on anticompetitive activities

Individuals, both employees and third parties, have free access to and are encouraged to make use of the Speak Up Channel to confidentially¹¹⁹ report evidenced or suspected violations related to antitrust and competition laws. The CEBC sets clear expectations to those under the scope, emphasizing the establishment of accessible grievance mechanisms.

In accordance with the Amadeus Speak Up Policy, no employee or third party shall be retaliated against for reporting, in good faith, evidenced or suspected violations of this policy to the company. See sections *G1-1 - Business conduct policies and corporate culture* and *Amadeus Speak Up channel and investigations* for more details.

Additionally, all employees subject to the Antitrust and Competition Policy must promptly report any suspected violation to the individual's Director; or the Corporate & Legal Affairs department; or P&C.

¹¹⁸ The campaign was launched in September 2024.

¹¹⁹ Amadeus will communicate with anonymous senders to assist in the investigation process and provide status of the report by encouraging them to select "secured postbox".

[Metrics on fair competition](#)

In 2024, a class action complaint was filed in a US federal court in Illinois against Amadeus and several hotels for alleged infringement of US antitrust laws. Amadeus disputes the allegations and is defending itself vigorously in this lawsuit. Amadeus is not subject or party to any other legal actions pending or completed regarding anti-competitive behavior and has not been identified as a participant in any other violations of anti-trust and monopoly legislation.

In relation to training related activities, 3,549 have been trained in Antitrust and Competition Law Compliance in 2024¹²⁰.

¹²⁰ In order to collect the related information, data from Group Ordinary Systems (Workday) has been obtained. Total number of employees that have completed the course have been taking into consideration.

Fair and transparency tax practices (entity specific)

ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to fair and transparency tax practice

Being a global enterprise, Amadeus recognizes the importance of tax for both economic and social progress. The Group generates positive impacts and contributes to value creation while ensuring the standards of tax compliance in the countries in which it operates -both in relation to taxes paid directly by the Group and taxes collected from third parties but derived from the Group's activities- and reporting transparently on tax matters. This is part of its contribution to the sustainability of public finances and the development of the communities.

Given the importance of fair and transparency tax practices within Amadeus, the Board of Directors has approved the Corporate Tax Policy, designed to assist the company in its compliance with all appropriate tax laws and regulations in every country and jurisdiction in which it operates. Moreover, Amadeus aims to be recognized for its practices and programs on corporate and tax governance.

Tax is also integrated into the ESG Ambition, as part of the commitment to be a reference of trust and integrity, with the aim of maintaining or even maximizing the positive impacts created.

ESRS - G1- Business conduct (Entity specific)

Impacts, risks and opportunities

Entity specific	Time horizons ¹	Scope
Fair and transparency tax practices	-	Own operations

+ Positive impact

¹Identified impacts are actual. Consequently, time horizons are not applicable.

Through fair and transparency tax practices, Amadeus also promotes and contributes to the achievement of the Sustainable Development Goals and encourages the adoption of sustainability criteria, as emphasized by the European Economic and Social Committee.

MDR-P - Policies adopted to manage material sustainability matters - Fair and transparency tax practices

Amadeus Corporate Tax Policy, approved by the Board of Directors, commits the Company to being a responsible taxpayer.

Key policies - Fair and transparency tax practice

Corporate Tax Policy

Description and objectives	The Amadeus Corporate Tax Policy sets out the group's tax principles, based on ensuring compliance with applicable tax regulations, excellence and commitment to the application of good tax practices, appropriate to the corporate and governance structure of the Group. This policy is governed by the following principles: • Full compliance with applicable tax legislation in the jurisdictions where the Group operates. • Alignment of the Tax Policy and system management with the rest of Amadeus' policies. • Implementation of an appropriate transfer pricing policy at Group level, ensuring alignment of the tax structure with the business model and guaranteeing compliance with the arm's length principle in accordance with the provisions of the tax legislation in the countries involved in each operation, as well as with the internationally accepted regulatory framework. • Carry out the necessary due diligence and structure analysis to identify, prevent and control tax risks in all relevant assets, entities and business acquisition/disposal and internal restructuring transactions. • Non-use of non-cooperating jurisdictions, especially tax havens¹, to artificially channel operations, as well as non-use of complex tax structures inconsistent with the business with the sole purpose of minimizing the Group's tax burden. • Responsible, informed, efficient, and transparent management of all matters relating to emerging domestic and international regulations in the digital economy. • Transparent application of tax incentives, in accordance with the regulations in force in the different territories in which Amadeus operates, provided that these incentives arise out of the Group's ordinary activity, are aligned with the reality of the business, have not been artificially generated to minimize the global tax burden and, to the extent possible, can promote the Sustainable Development Goals. • Foster certainty in the interpretation of tax laws, whenever possible, through the active use of tax forums, prior transfer pricing agreements, inquiries and use of any other mechanisms provided in each jurisdiction, or made available by the Administration, as well as building relationships based on trust, integrity, and transparency. • Ensure that the departments involved in the tax processes have the necessary human and material resources to ensure compliance with tax obligations in all countries in which the Group carries out its activities. • Maintain internal control systems for tax processes that adequately and systematically manages compliance with tax obligations, identifying and assessing tax risks and periodically reviewing the controls associated with these processes to ensure good tax governance. • Promote a tax transparent attitude before its interested parties. • Cooperation and collaboration with the tax authorities in their audit or verification activities notwithstanding the legitimate right of the Company to disagree with the criteria of the tax authorities and to maintain its own position before the Courts².
Related material IROs	See section above <i>ESRS 2 SBM-3 - G1 - Material impacts, risks and opportunities related to fair and transparency tax practice</i>
Process for monitoring	The Group of companies adopts the necessary control mechanisms to comply with tax regulations, as part of proper business management, as well as with the principles and good practices set in this Policy. Likewise, they dedicate adequate and sufficiently qualified human and material resources to such purposes. This Policy is developed through various internal rules, procedures, instructions, and circulars that make up the tax compliance system. At the same time, compliance with the Policy and its development documents is internally measured and evaluated on an annual basis as it is defined by the set of rules that comprises the Tax Compliance and Management System. See section below containing detailed information about the tax governance model in Amadeus.
Scope or its exclusions	The Policy applies to all taxes, tax risks and tax topics managed in all countries where the Group operates or has a presence, and to all Amadeus Group companies.

Most senior level accountable for its implementation	The Board of Directors is the ultimate body responsible for the approval of this Policy, the same will be reviewed every three years, notwithstanding the submission for approval of a new document in the event of material changes. Additionally, the Tax Compliance Committee, with the assistance of the Corporate and Tax Unit, ensures the proper implementation and continuous improvement of the tax compliance system, supporting the Audit Committee and reporting to the Board and Executive Committee recurrently. See section below containing detailed information about the tax governance model in Amadeus.
Third-party standards or initiatives	Sustainable Development Goals. International and national standards governing tax compliance, tax management and transfer pricing such as: GRI-207, Spanish Code of Good Practices, Tax Compliance Standard UNE 19602, OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and Recommendations of the EU Joint Transfer Pricing Forum.
Interests of key stakeholders	Amadeus' Corporate Tax Policy has adopted as fundamental pillars the principles of cooperation and collaboration with the tax authorities. Additionally, promoting responsible tax practices, proper tax contributions while enhancing a tax transparent attitude before its interested parties is a commitment included in the Policy. Finally, through the Speak Up Channel, Amadeus' stakeholders may report (a) irregular conduct, breaches or suspicions based on non-compliance in the matters contemplated in its Code of Ethics and Business Conduct, among which is tax matters, and other regulations, policies and procedures on which they are based and developed, such as this Policy, or in the laws or, (b) to file any query, doubt or concern regarding the Amadeus tax risk management and control system. See more information in section <i>G1-1 - Business conduct policies and corporate culture</i> .
Availability	Amadeus's Corporate Tax Policy is publicly available to stakeholders at Amadeus website: https://corporate.amadeus.com/documents/en/investors/all-years/corporate-governance/corporate-tax-policy.pdf

¹ Amadeus understands tax haven / non-cooperative jurisdictions as those territories that are defined by the Spanish Law for the prevention of tax fraud and any other rules which determine the countries or territories classified as tax haven by virtue of the Minister of Finance by Ministerial Order. In addition, to the extent that the Group operates from a jurisdiction other than the parent company (Spain), those jurisdictions defined as such in the laws of the countries in which they operate will also be considered tax havens / non-cooperative jurisdictions. The presence of Amadeus' business in certain jurisdictions classified as non-cooperative or low-taxation is solely and exclusively due to reasons intrinsic to the business model itself, such as contracts signed with travel agencies or national travel providers within those jurisdictions.

² Additional information regarding Amadeus' tax litigations can be found in the Consolidated Annual Accounts, Taxation Section.

Tax governance

Amadeus has established a framework of Government on tax matters structure to ensure that the Group's actions and operations are governed by clear principles, values and norms that allow to any employee, any person or entity who is associated with the Group and to the management body, to take the appropriate decisions to comply with the tax law in those jurisdictions in which the Group carries out activities.

Additionally, this framework aims to properly manage the Group's tax risks, efficient control and proper compliance with tax governance, tax regulations and the principles of the Corporate Tax Policy.

- The Board of Directors has the power to design, evaluate, approve and review corporate policies, including the tax related policy, on an ongoing basis. The Board shall promote monitorization by the Group of the tax strategy and of the principles and Good Tax Practices.
- The Audit Committee has several competencies in respect to tax matters:
 - Prior to elaborating the annual accounts and submitting the annual Corporate Income Tax return, the Audit Committee, previously updated by the Responsible of Tax Department, informs the Board of Directors about the tax criteria applied during the corresponding fiscal year, and with respect to the fulfillment of this Tax Policy. In addition, the Audit Committee, via its delegated body, the Tax Compliance Committee, reports its conclusions on the evaluation and supervision of its tax risk management and control system. This reporting is done through the Tax Compliance Report.

- Based on the information prepared by the Corporate & Tax Unit, and included in the Global Report and Tax Compliance Report, informs the Board of Directors about the tax policies applied by the Company and, in case of those transactions and operations that require the Board of Directors' approval, the related tax implications in case they may generate a relevant risk.
- The Executive Committee will perform the corresponding functions of the Senior Management.
- The Chairman and Chief Executive Officer and the entire management team promote the monitoring of the tax principles and good tax practices set out in the Corporate Tax Policy.
- The Group Tax Unit is responsible for ensuring compliance with the Group's tax obligations in the countries in which it operates, respecting the principles and good tax practices of the Corporate Tax Policy as well as the continuous control of new tax regulations that impact the Group's companies with the aim of adapting to them in due time and form. It is also responsible for detecting or implementing the necessary controls to identify the tax risks of the Group's companies.
- The Corporate Finance and Accounting Unit is responsible to ensure that the company's tax-related practices and procedures comply with tax laws, calculating taxes accurately and ensuring timely tax returns, supporting tax audits and ensuring compliance with tax regulations. They are also in charge of adapting the company's accounting reporting system to properly comply with any tax obligations with the support of IT department. This Unit acts in coordination with the Group Tax Unit, from whom it receives support and advice.
- The Tax Compliance Committee¹²¹ is the primary guarantor of the supervision, oversight, and control of the Amadeus Group's Tax Risk Management and Control System. Within its scope of activities, the Tax Compliance Committee is required to promote and assess the correct implementation and efficacy of the Amadeus Group's Tax Risk Management and Control System to enable the prevention, detection, management, and mitigation of tax risks. As part of its obligations, the Tax Compliance Committee reports regularly to the Executive Committee, Audit Committee, and Board of Directors about key tax topics that arise throughout the financial year.

MDR-A - Actions and resources in relation to material sustainability matters - Fair and transparency tax practice

The company has established different structures and initiatives to contribute to the achievement of the Tax Policy commitments:

- In relation to international tax, the Group encourages and promotes standards in terms of compliance and settlement of the legally required taxes through an efficient management of tax costs, without incurring undue tax burdens.
- Regarding local taxes, Amadeus aims to maintain internal control systems identifying and assessing tax risks and periodically reviewing the controls associated with these processes.
- Finally, in regard to transfer pricing, Amadeus' goal is to implement an appropriate transfer pricing policy at Group level that leads to an alignment of the tax structure with the business model, ensuring compliance with the arm's length principle in accordance with the different national tax legislation of the countries involved and the internationally accepted regulatory framework (OECD and EU).

¹²¹ This is a Tax Compliance body comprised of Amadeus executives with responsibilities in Corporate Accounting, Financial Service Centers, Corporate Compliance, and Tax areas.

In this framework, transparency plays a pivotal role as it has been established in the Group's Corporate Tax Policy. Following its wording, the Company manages its tax affairs within a framework characterized by transparency, proactivity, and constructive relationships with tax authorities, consistently upholding our responsibilities towards stakeholders and ensuring alignment with the spirit of the law.

This is reflected in some related actions that are already underway (ongoing actions with no specific end date). Regarding the resources allocated, each of these actions do not surpass individually the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements.

Key actions - Fair and transparency tax practices

Implementation and maintenance of a Tax Risk Management and Control system	
Scope	Amadeus Group
Description	Amadeus has defined a tax risk management and control system (the System) whose objective is to apply the best tax compliance standards in every company in which the Group operates. This System in place defines the main components to prevent, reduce and mitigate tax risks related, including, among others the tax control environment (structure and functions, standards, responsibilities, etc), the identification and evaluation processes, the implementation of controls - when applicable -, reporting, etc To reinforce achieving these objectives, Amadeus has created an ad hoc body, the Tax Compliance Committee. Furthermore, the Board of Directors, via the Tax Compliance Committee, supported by the Corporate and Tax Unit, periodically reviews the system's effectiveness and verifies that it is duly updated if required.
Preserve tax compliance certification (UNE19602)	
Scope	Amadeus Group
Description	Amadeus IT Group, S.A. has been granted with the Tax Compliance Certification under the UNE19602 standard.
Strengthening Amadeus's Group position in tax transparency ratings	
Scope	Amadeus Group
Description	As part of the Group's tax transparency strategy, Amadeus has implemented certain changes and improvements in its annual reporting which will not only enhance the fiscal data reported to stakeholders but also improve scores in various national and international tax transparency rankings, among others: • "T* of Transparent" seal from HAZ Foundation: Amadeus has been part of the ranking of transparency in corporate tax responsibility of IBEX 35 companies for several years. During 2024, for the first time, the Haz Foundation has granted Amadeus the seal of tax transparency in the 't* de transparente' modality for obtaining a percentage of 70-80% of compliance with the indicators evaluated. This study examines the level of transparency that IBEX35 companies have regarding the voluntary disclosure of information related to their tax obligations. Thanks to the improvements mentioned, Amadeus plans to increase its rating in the coming years. • European Tax Transparency Benchmarking. Since 2022 Amadeus has been part of the Tax Transparency Benchmarking prepared by the dutch Association of Investors for Sustainable Development (VBDO) in collaboration with PwC. Thanks to the actions taken, Amadeus has been improving its score in this ranking in recent years, managing to position itself as one of the 'Top Scorer' entities in the principles of 'Respect the spirit of the law - Tax-compliant behavior is the norm' and 'Monitor and test tax controls.' The Group's objective is to maintain this trend and continue improving its ranking and score.

Improve tax transparency	
Scope	Amadeus Group
Description	In 2024, Amadeus, for the first time, included in its Global Report information regarding its total tax contribution and a breakdown of taxes borne and collected (pertaining to entities representing 92% of the group's relative weight). To continue addressing the needs of the stakeholders, the Group will once again include these figures in 2025, along with additional details that will provide a clearer understanding of the Group tax contribution map.
Training in tax matters	
Scope	Employees involved in the tax function at Amadeus
Description	To be aligned with new market trends, regulatory changes, and the constantly evolving tax environment, all employees involved in the tax function receive appropriate training. As part of the Amadeus Tax Compliance System, these employees participate in both internal and external technical training sessions in the field of taxation.
Uphold cooperative relationships with Tax Authorities	
Scope	Amadeus Group
Description	The Amadeus tax approach is to manage tax matters in a transparent and responsible manner with all stakeholders. - Since its creation in 2010, Amadeus has been adhered to the Code of Good Tax Practices adopted by the Spanish Tax Authority (AEAT), which is in line with the principles and guidelines on tax matters established in the Group's Tax Strategy (see section above, <i>MDR-P - Policies adopted to manage material sustainability matters - Fair and transparency tax practices</i>). - Within the framework of the Code, Amadeus IT Group voluntarily presents the annual "Tax Transparency Report" for companies adhering to the Code of Good Tax Practices to the Spanish tax authorities, which includes detailed information on the group's taxation. This report is currently the most relevant instrument of the cooperative relationship with the tax authorities.

MDR -M - Metrics in relation to material sustainability matters - Fair and transparency tax practices

The Amadeus Group Tax Policy reflects the company's commitment to social responsibility, aligning the interests of its shareholders, main stakeholders and the broader society it supports while upholding principles of honesty, transparency and collaboration.

Since 2018, Spanish companies have the possibility of assigning 0.7% of their respective corporate income tax due, to entities which pursue social purposes. In a continuous effort to contribute to the communities in which it is involved, Amadeus has opted to exercise this option (see section above, *MDR-A - Actions and resources in relation to material sustainability matters - Fair and transparency tax practice*).

Country	2024		2023	
	Pre-Tax Results ¹	Tax Cash Paid ²	Pre-Tax Results ¹	Tax Cash Paid ²
Albania	6,831.92	15.00	-17,157.75	N/A
Angola	293,437.23	N/A	67,927.60	N/A
Argentina	2,330,006.04	3,649,930.05	7,848,317.34	567,875.78
Armenia	345,014.76	120,906.09	484,989.82	114,258.34
Australia	-30,017,525.44	2,520,280.79	3,335,704.61	-1,722,515.01
Austria	-721,050.61	156,256.00	1,451,970.73	64,324.34
Bahrain	5,331.07	N/A	416,221.46	N/A
Bangladesh	704,609.76	34,601.52	N/A	N/A
Belgium	1,809,813.30	700,724.55	1,798,297.16	607,403.73
Bolivia	-323,263.98	3.17	-94.90	N/A

Bosnia	-4,411.19	1,367.50	-18,196.21	-3,938.39
Brazil	-1,684,612.62	1,962,160.61	-1,210,293.14	46,500.68
Bulgaria	1,744,019.54	312,550.75	1,908,645.44	336,313.35
Cameroon	124,146.48	15,933.23	32,473.00	N/A
Canada	3,948,132.26	1,137,653.45	2,269,293.73	601,423.66
Cape Verde	4,913.15	9,056.74	4,666.00	N/A
Chile	699,687.23	-19,749.68	316,583.66	-175,654.74
China	47,215,324.44	1,128,524.40	1,936,721.29	352,621.60
Colombia	2,091,000.13	525,908.53	1,379,369.10	136,625.79
Congo Republic	25,485.72	13,353.41	13,363.00	N/A
Costa Rica	1,363,629.57	321,545.20	101,456.36	190,397.32
Cuba ³	-1,044.55	N/A	-1,545.87	N/A
Czech Republic	286,891.01	91,793.13	353,813.46	46,887.22
Democratic Republic of the Congo	-13,135.03	73,186.81	71,572.00	N/A
Denmark	511,313.32	172,778.27	595,097.42	74,814.27
Dominican Republic	724,637.41	123,989.48	177,615.77	13,106.68
Dubai ⁴	4,929,340.73	N/A	4,952,853.98	N/A
Ecuador	128,899.69	72,675.94	160,960.56	60,004.27
El Salvador	20,444.24	14,193.18	-1,586.33	14,274.73
Estonia	47,076.45	60.37	81,446.25	108.04
France	462,695,644.89	37,313,762.00	391,023,043.25	1,289,870.95
Gabon	423.45	1,599.99	6,703.00	N/A
Germany	159,377,725.19	73,092,353.53	140,761,945.56	1,839,451.16
Ghana	251,647.46	82,877.97	22,768.62	6,623.18
Greece	242,719.87	117,176.91	20,071,396.09	73,129.85
Guatemala	261,450.62	63,650.19	38,294.80	35,137.14
Honduras	-11,497.68	8,563.24	18,803.16	303.83
Hong Kong	-63,990.28	N/A	3,000,000.21	439,458.30
Hungary	338,241.88	58,567.41	438,748.95	3,170.81
India	51,646,993.12	22,653,754.51	38,677,346.97	11,790,115.87
Indonesia	57,044.22	19,956.07	57,422.58	42,277.61
Ireland	80,392.77	14,397.00	77,548.57	836.34
Israel	-2,066,610.25	612,624.72	980,230.99	285,719.47
Italy	677,077.11	397,475.00	543,244.99	N/A
Ivory Coast	-384,853.17	-89,293.34	-32,721.00	19,380.17
Japan	3,069,288.26	1,314,375.48	1,873,172.76	566,454.56
Kazakhstan	124,465.23	226,409.93	229,149.50	72,368.24
Kenya	-817,267.39	261,807.09	-322,207.06	289,168.92
Latvia	145,203.05	2,129.27	-361,750.67	2,370.01
Lebanon	655,502.01	23,442.46	1,180,771.98	5,871.40
Lithuania	93,144.59	43,089.74	90,392.30	7,934.00
Luxembourg	57,091.82	12,002.00	54,989.96	11,463.00
Macedonia	29,708.56	1,170.64	8,272.76	1,234.73
Malaysia	-155,421.94	58,764.61	150,332.35	78,717.13
Malta	12,987.99	14,882.00	13,051.67	-3,315.00
Mauritius	180,463.63	3,636.72	27,975.43	25,111.24

Mexico	1,031,437.98	119,023.92	-388,385.95	12,384.57
Mozambique	14,864.44	N/A	-16,719.79	13,560.70
Nepal	349,741.42	55,610.59	N/A	N/A
Netherlands	3,837,584.24	92,604.45	-2,233,146.52	379,805.57
New Zealand	920,547.33	446,859.05	823,671.42	-47,588.35
Nigeria	371,460.14	31,249.36	195,918.89	58,890.08
Norway	494,413.31	112,309.59	-634,260.42	99,213.76
Peru	271,200.63	20,054.29	259,727.80	277,871.64
Philippines	3,601,372.97	504,930.31	4,451,049.87	360,188.19
Poland	1,679,789.50	588,775.67	523,554.17	545,858.77
Portugal	6,611,258.91	591,834.49	71,003.26	9,282.98
Romania	129,102.88	17,606.24	142,860.69	49,420.69
Russia	170,904.59	89,103.41	-277,322.46	377,352.32
Saudi Arabia	619,532.86	-5,937,820.09	652,774.66	153,633.13
Senegal	76,414.91	110,346.24	32,798.00	N/A
Singapore	5,368,199.19	1,836,480.65	5,350,788.50	1,224,322.07
Slovenia	29,382.95	10,579.07	55,134.42	13,001.07
South Africa	644,899.04	521,053.92	2,286,865.56	90,903.92
South Korea	261,774.21	199,392.32	249,243.93	75,861.51
Spain	1,507,530,891.36	43,960,936.28	870,883,902.69	145,689,499.88
Sri Lanka	679,280.39	118,722.32	N/A	N/A
Sweden	2,057,268.89	817,952.87	-47,707.81	572,889.32
Switzerland	647,881.55	295,306.20	818,090.18	95,961.06
Taiwan	-113,887.31	126,389.57	204,589.77	26,724.61
Tanzania	89,460.19	351,676.75	88,374.80	N/A
Thailand	4,696,534.58	774,168.12	2,198,611.06	676,716.58
Turkey	210,608.15	392,751.43	-152,251.93	56,341.81
Uganda	-135,862.59	90,638.82	-37,973.88	N/A
Ukraine	314,110.77	70,810.13	328,957.71	147,198.04
United Kingdom	12,982,493.71	2,549,428.36	12,558,248.01	1,785,708.15
Uruguay	277,394.61	24,055.77	135,537.42	5,608.30
USA	170,035,667.15	12,970,037.90	127,846,047.06	35,109,897.89
Total	2,438,848,239.99	211,401,741.60	1,653,509,394.37	206,068,192.83

¹Pre-tax results are calculated under IFRS accounting principles.

²Tax Cash Paid refers to Corporate Income Tax and it applies on tax basis calculated under domestic accounting legislation.

³Amadeus operates in Cuba through a branch of Amadeus IT Group, S.A. (Spanish Head Office).

⁴Amadeus operates in Dubai through a branch of Amadeus IT Group, S.A. (Spanish Head Office)

It has not been included Corporate Income Taxes paid in countries where the group has not an entity.

N/A means no cash payment during year 2024 or 2023 (no tax exemption from Corporate Income Tax)

In relation to the public subsidies received, in 2024 Amadeus SAS obtained €155,506.84.

MDR-T - Tracking effectiveness of policies and actions through targets - Fair and transparency tax practices

Aligned to Amadeus tax related commitments and the key actions that are already underway, the Company has set several qualitative tax-related targets to reinforce its positive impacts in the short, medium and long-term.

Key targets- Fair and transparency tax practices

- Maintain exemplary standards for Tax Compliance and Tax Risk Management. Amadeus' goal is to implement and sustain in the long-term the highest quality standards and controls for the management of tax compliance and tax risks within the Group.
- Tax Transparency and Reporting enhancement. The Amadeus target is annually upgrade and gradually enlarge the level of fiscal transparency.
- Alignment with stakeholders. Comprehend and adapt to stakeholders' demands in terms of taxation, this includes internal, external groups of interests, as well as Tax an relevant Authorities.

Cybersecurity (entity specific)

ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Cybersecurity

Security is at the heart of Amadeus’ systems in terms of application design, operations and part of its key capability to provide high-performance transaction processing under stringent system availability, security and performance requirements.

However, the overall industry and citizens are facing a rising tide of cyber attacks and frauds. The travel industry is no exception and the company is subject to, and manages as part of its corporate risk management, cybersecurity related risks. Cybersecurity risks span from potential security incidents that could impact internal services as well as IT services the Company provides. This could lead to operational downtime, financial losses and damage to Amadeus’ reputation.

Additionally, failure to comply with particular cybersecurity laws, certifications or standards adopted by Amadeus could trigger fines, penalties and loss of business due to non-compliance.

ESRS - G1- Business conduct (Entity specific)		
Impacts, risks and opportunities		
Entity specific	Time horizons	Scope
Cybersecurity	Medium-term	Own operations
		
 Risk		

Therefore, cybersecurity risks-related are included in the Amadeus’ corporate risk map and the company has robust cybersecurity measures in place and a mature cybersecurity culture. Finally, it is important to mention that the ESG Ambition includes cybersecurity as key part of the commitment to be a reference of trust and integrity.

MDR-P - Policies adopted to manage material sustainability matters - Cybersecurity

Cybersecurity governance model

The company has implemented the “Three Lines Model” as part of Amadeus’ commitment to strong governance and risk management practices. Cybersecurity, through the Corporate Information Security Office, is one of the functions included in the second line. In addition, the Audit Committee periodically receives updates on cybersecurity topics throughout the year. The reports made to these governing bodies allow information security risks, as one of the main risks identified by the company, to be monitored (see more information in sections *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies* and *GOV-5 – Risk management and internal controls over sustainability reporting*).

The Executive Management is accountable for information security and ensures compliance with security policies, standards, procedures and practices within their respective areas of responsibility.

For its part, the Group CISO (Chief Information Security Officer) is responsible of:

- Approving corporate information security objectives.
- Validating methods of implementing and enforcing security controls throughout the whole enterprise,

- Advising the enterprise on any security-related issue.
- Ensuring that information security awareness is in place, and that security risk assessments are performed and followed-up.
- Ensuring appropriate security functions are in place (e.g., security incident management).

Top management of each company area is accountable for information security within their respective area of responsibility, implementation of the established security measures and for reporting the status to the Group CISO.

Finally, the Group CISO is supported by the Security Community to achieve its mission. This includes Security Officers for the various Business Units and domains.

[Information Security Policy](#)

[Key policies - Cybersecurity](#)

Global Information Security Policy	
Description and objectives	The Security Policies and Standards (SPS) comprises a "Global Information Security Policy" at the top level, which is detailed into a number topic-specific policies. The Global Information Security Policy presents the organization, governance bodies and objectives for ensuring information security within Amadeus, and represents the endorsement of Amadeus' top management. It identifies the motivation for information security, and the responsibilities of the various security roles and governance bodies. Each topic-specific security policy is detailed in "Corporate Standards" which define the controls to be implemented in order to comply with the policies. In case of specificities pertaining a specific business environment, "Business Standards" (additional or more detailed controls) may be developed under the corresponding Corporate Standard. The SPS content prescribes the baseline information security measures that shall be implemented across the company in order to protect and properly manage its assets. In addition, Information Security Risk Management is fundamental to continually adapt and improve the company's information security to the evolving landscape. A company-wide Information Security Risk Management methodology, based on ISO 27005, is defined as part of the SPS. Information security risk assessments are performed on a quarterly basis.
Related material IROs	See SBM-3 - G1 - Material impacts, risks and opportunities related to Cybersecurity
Process for monitoring	The Global Information Security Policy is updated if significant changes/new influencing factors, whether internal, or external, in the Amadeus business context arise. A governance model for cybersecurity topics has been set at Amadeus to comply and properly monitor the achievements of the related commitments. See section above containing detailed information about the cybersecurity governance model in Amadeus.
Scope or its exclusions	Adherence to the Global Information Security Policy is mandatory for all fully and majority owned Amadeus companies. Furthermore, compliance with the Global Information Security Policy is mandatory for all parties and individuals (employees, temporary employees, trainees, contractors and other personnel) involved in the collection, processing, storage and/or transmission of information owned by Amadeus or processed, stored and/or transmitted on behalf of its customers.
Most senior level accountable for its implementation	It is approved by Amadeus Executive management. See section above containing detailed information about the cybersecurity governance model in Amadeus.
Third-party standards or initiatives	The SPS has been defined, and is continually updated, considering input from industry standards and best practices, such as the ISO 27000 series or PCI DSS, and considering legal, statutory, regulatory and contractual requirements.
Interests of key stakeholders	The SPS has been defined considering input from several industry standards and best practices, and as such, the interest of key stakeholders.
Availability	It is available to the own workforce in the intranet. Additionally, the Policy is sent to customers, when requested.

MDR-A - Actions and resources in relation to material sustainability matters - Cybersecurity

Amadeus invests in cybersecurity and collaborates with key stakeholders to anticipate and prevent cybersecurity-related risks, whether potentially caused by security breaches or due to failure in cybersecurity compliance. Therefore, actions, both preventive and reactive, are being conducted and have already been implemented to manage cybersecurity risks (ongoing actions with no specific end date).

Regarding the resources allocated, each of these actions, when considered individually, does not surpass the internally established threshold to be classified as significant operating and/or capital expenditures. This threshold has been defined to align with the materiality threshold of the financial statements.

Key actions - Cybersecurity

Security Operations Center harmonization for mergers and acquisitions	
Scope	Amadeus Group
Description	The Company has its own, dedicated Security Operations Center (SOC) to monitor 24x7 the security status of IT infrastructure and services provided to customers, rapidly respond to security-related events and also monitoring emerging security threats and vulnerabilities. During 2024 the Company has been harmonizing security operations processes and tools, particularly across its mergers and acquisitions so as to optimize the efficiency and effectiveness of security processes. In this way, Amadeus aims at reducing risks of cybersecurity breaches.
Adoption of new regulations and updated industry standards	
Scope	Amadeus Group
Description	Cybersecurity is in constant evolution and adapting to new technologies and threats. In recent years Amadeus has seen significant updates to industry standards, such as PCI DSS v4 or ISO 27001/2:2022. Amadeus continually reviews its cybersecurity practices and through this action leverages the most up to date industry best practice. Cybersecurity legislation and regulations have significantly evolved over the last year. This requires specific actions to ensure adherence and compliance. A good example is the recent European Directive 2022/2555 (NIS 2) to which Amadeus is subject. The Company is staying at the forefront of compliance to this legislation and has run actions to analyze its applicability and any gaps, in addition to collaborating with relevant authorities and other industry stakeholders in this endeavor. In this manner, Amadeus cybersecurity practices are aligned to the new regulations and industry best practice.
Training in cybersecurity	
Scope	Amadeus Group
Description	Awareness-raising activities and ongoing training on information security have been provided to Amadeus' own workforce. Additionally, Amadeus provides cybersecurity training to its third party contractors with access to Amadeus information systems. Specific training is also offered to employees performing specialized roles or functions. Furthermore, Amadeus implements other measures to monitor the strength of the cyber culture within the company, such as phishing simulation campaigns. These activities have improved the ability of Amadeus own workforce to identify phishing emails and automatically report them to the security team. See section below "Metrics in relation to material sustainability matters - Cybersecurity" for figures about training in 2024.
Internal and external assessments	
Scope	Amadeus Group
Description	Both internal and external assessments are conducted to comply with standards that Amadeus has adopted for specific scopes of services.

Process to report security incidents	
Scope	Amadeus Group
Description	The Company has established a process to report and manage security events and incidents. Employees and contractors are aware on how to report suspicious security-related events. An external channel for reporting any vulnerabilities on Amadeus services is implemented. Additionally, all Amadeus computers have an anti-phishing reporting function. Internally, through the Speak Up Channel, stakeholders can inquire or report on security provisions or policies, among others (see further information in section <i>Amadeus Speak Up Channel and investigations</i>).
Procedure for handling incidents	
Scope	Amadeus Group
Description	Amadeus has a procedure for handling incidents (Amadeus Security Incident Response Plan), detailing how to manage security events potentially impacting systems and data confidentiality, integrity and availability. It encompasses as well events potentially affecting, or notified by, key suppliers. This response plan is tested on a regular basis.
Sharing best practices	
Scope	Amadeus Group and particular partners
Description	The Company shares cyber intelligence, alerts, knowledge and best practices with partners. For instance, Amadeus is a member of the Aviation Information Sharing and Analysis Center (A-ISAC), demonstrating its commitment to customers trust and best practice sharing.

Finally, it is important to mention that the company has insurance in place to assist in the mitigation of the impact of cyber attacks on financial statements.

MDR -M - Metrics in relation to material sustainability matters - Cybersecurity

Cybersecurity training

During 2024, 100% of Amadeus employees have received cybersecurity related training.

As of December 31, 2024

Cybersecurity training completion (%)	99.61 %
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Amadeus employees are automatically added to its security awareness platform. This means that as soon as employees have access to systems, they are enrolled to the corresponding cybersecurity campaigns. In other words, everyone at Amadeus is enrolled in security training. Amadeus monitors completion per campaign, as the number of employees added to the campaigns varies each month. Here, the company focuses on the completion rate of each campaign for the employees.

MDR-T - Tracking effectiveness of policies and actions through targets - Cybersecurity

In line with Amadeus’ commitments to embed security practices in the organization, reduce related risks, and improving employee cybersecurity training (see sections above), the Group has defined the following target.

Key targets - Cybersecurity

Cybersecurity training completion ¹	
Target	98% cybersecurity training completion in 2025
Scope	Amadeus employees
Baseline value and base year	95% in 2023

¹See section above MDR -M - Metrics in relation to material sustainability matters - Cybersecurity for more information about the target.

Information about the methodology used to define the target, how Amadeus have considered stakeholders opinion and how the Group is tracking them is included in sections *Sustainability-related goals*, at the *ESRS 2 SBM-1- Strategy, business model and value chain* containing details and *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*

Data privacy (entity specific)

ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Data privacy

Processing personal data, specially personal data of travelers, is inherent and core to the role Amadeus plays in the travel industry. In addition to traveler data, Amadeus processes personal information about employees and candidates, visitors, website visitors, contractors, and business partners, amongst others.

The company is aware of the increasing potential for impacts in relation to the use of data, including personal data. Consequently, ensuring personal data is handled in a compliant and ethical manner is key for Amadeus to prevent and mitigate negative related impacts and foster positive ones.

On the other hand, regulatory pressure in this field poses significant challenges to adapt and respond to regulatory demands comprehensively and on time. Amadeus is subject for example to the European General Data Protection Regulation (GDPR) which imposes strict obligations. In this context, privacy risk management has a prominent position in the Amadeus’ risk map.

ESRS - G1- Business conduct (Entity specific)		
Impacts, risks and opportunities		
Entity specific	Time horizons	Scope
Data protection		
+ - R	Medium-term	Own operations
+ Positive impact - Positive impact R Risk		

In order to properly address these regulatory requirements, the company has established a Privacy Program, setting related policies, procedures, and standards, and has defined a data privacy governance model to properly implement it, lead by the Group Privacy Office. To define them, Amadeus has taken into account the EU General Data Protection Regulation (GDPR) and other internationally recognized privacy standards, such as the Guidelines of the United Nations and of the OECD, the APEC Privacy Framework or the ISO/IEC 27701 Privacy Information Management System and ISO/IEC 29100. In this regard, Amadeus’ goal is not limited to regulatory compliance, but integrates the protection of personal data as a key element in the core of its activities.

MDR-P - Policies adopted to manage material sustainability matters - Data privacy

Data privacy governance model

Responsibilities related to privacy are split among different roles and governance bodies:

- The Audit Committee receives updates on privacy matters throughout the year (see more information in section *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*). The Chief Privacy Officer (hereafter, CPO) is in charge of this reporting.
- The Corporate Top Management is accountable for privacy in Amadeus, ensuring compliance with Amadeus privacy policies, processes and standards.
- The Business Unit and Corporate Function Top Management is accountable for privacy and the implementation of the privacy processes and requirements within their respective areas of responsibility.

- The CPO is responsible for privacy-related activities across the functions and geographies of the Amadeus group.
- The Group Privacy Office (hereafter, GPO) supports the CPO in the implementation of all its responsibilities.
- Additionally, designated data privacy coordinators (known internally as Business Privacy Specialists) for the business areas and corporate functions form part of the data privacy network chaired by the CPO.

A privacy governance framework has been set to address privacy-related matters at business unit level, agree on future actions to address main data protection issues identified with a consistent and harmonized company approach, and follow up the integration of new privacy initiatives and the implementation of ongoing projects.

Global Privacy Policy

One of the most important pillars of the Amadeus Privacy Program is the Amadeus Privacy Policy Framework. This framework comprises policies, standards and procedures to promote the highest level of compliance throughout the processing of their information and personal data.

Key policies - Data privacy

Global Privacy Policy	
Description and objectives	The Amadeus' Global Privacy Policy is the global policy that presents the privacy organization, privacy governance bodies, and privacy objectives within Amadeus, and represents the endorsement of Amadeus' top management. It identifies the motivation for privacy, and the responsibilities of the various privacy roles and governance bodies to comply with the three Amadeus Privacy Principles: • Transparency: Ensuring lawfulness and transparency of the processing, and the ability to comply with data subject rights. • Proportionality: Ensuring compliance with the principles of purpose limitation, minimization, storage limitation, and accuracy. • Adequate protection: Taking appropriate technical and organizational measures to protect personal data, including during transfers. The Policy defines the Amadeus' privacy objectives: • Preserving privacy in commercial agreement • Privacy by Design • Privacy documents implementation • Privacy awareness • Privacy addressed by third parties Non compliance with the Privacy Policy is subject to the same disciplinary actions as for all other relevant policies in the organization.
Related material IROs	See <i>SBM-3 - G1 - Material impacts, risks and opportunities related to Data privacy</i>
Process for monitoring	Privacy compliance is monitored via audits, either independent and objective assessments performed by Group Internal Audit or external audits performed by independent and qualified third parties on a yearly basis.
Scope or its exclusions	Adherence to the Amadeus Global Privacy Policy is mandatory for all fully and majority owned Amadeus companies. Additionally, compliance with the content of the Amadeus Global Privacy Policy is mandatory for all parties and individuals (employees, temporary employees, trainees, contractors, and other personnel) involved in collecting, processing, storage and/or transmission of personal information.
Most senior level accountable for its implementation	The Corporate Top Management is accountable for privacy in Amadeus, ensuring compliance with Amadeus privacy policies, processes and standards. See section above containing detailed information about the data privacy governance model in Amadeus.

Key policies - Data privacy

Global Privacy Policy	
Third-party standards or initiatives	Embedded within Amadeus' privacy principles are guidelines and standards from the EU's GDPR, the Organization for Economic Co-operation and Development (OECD), the United Nations, the Asia-Pacific Economic Cooperation (APEC) Privacy Framework and the International Organization for Standardization (ISO), enabling application in affiliates and adding value to all Amadeus' customers worldwide.
Interests of key stakeholders	The Amadeus privacy policies have been designed to safeguard potential stakeholders (individuals whose personal information is processed such as travelers, employees....). Consequently, their interests and protection have been placed at the core of the policies.
Availability	This Policy is available for employees in the Amadeus intranet.

In addition to the Global Policy, Privacy Policies and Standards have been established with input from various data protection and privacy laws, industry standards, and best practices (such as the ISO 27000 series and the National Institute of Standard and Technology (NIST) standards). Their contents outline the fundamental privacy measures and requirements that necessary to protect and properly manage personal data.

- The Privacy Policy details the privacy objectives and the controls to be implemented to achieve them.
- The Privacy Corporate Standards specify the controls to be implemented to meet the privacy objectives in specific organizational areas where additional details are needed.
- The Privacy Business Standards outline the controls to be implemented to meet the privacy objectives in specific organizational areas or locations where additional details are required, applicable only to that area or location.
- The Privacy Procedures provide detailed steps to implementing a specific control to ensure compliance with a particular privacy objective at a very granular level.

Data subject's rights

When acting as a data controller, Amadeus respects for a data subject's rights as applicable based on the legal ground for processing¹²². The Company takes them into account while developing its products/services/processes, informing the data subject (in each privacy statement) where and how to exercise their rights, etc.

In this regard, the different privacy statements are available in Amadeus website in a single repository for ease access, describing and providing appropriate information to the relevant individuals¹²³. These privacy statements explain to individuals how personal data is managed, the nature of information processed, how it is obtained, how long the information is kept on corporate files and how it is used, treated, and protected and any other relevant information.

The privacy statements have been split per activity and therefore Amadeus offers a privacy statement for the following:

¹²² These Data Subject rights cover:

- Right of access: grants Data Subjects the ability to access or receive a copy of its own the personal data processed.
- Right to rectification: grants Data Subjects the ability to request rectification when its own personal data is inaccurate.
- Right to erasure: grants Data Subjects the ability to request deletion of its own personal data.
- Right to restriction of processing: grants Data Subjects the ability to request restriction of the processing of its personal data.
- Right to data portability: grants Data Subjects the ability to request transmission of its own personal data to another controller.
- Right to object: grants Data Subjects the ability to object to the processing of its personal data.

¹²³ Please see <https://amadeus.com/en/policies/amadeus-policies>

- GDS Privacy Statement: to inform about processing of traveler personal data in the Amadeus system¹²⁴.
- Business Partners Privacy Statement: to inform how Amadeus processes personal information of customers or partners’ employees¹²⁵.
- Amadeus.com Privacy Statement: to inform about processing of personal data on the website.
- Cookie privacy statement: to inform about processing of personal data in cookies.
- Career site Privacy Statement: to inform about processing of personal data of candidates.

Amadeus has a process to receive, review, address, and solve privacy-related concerns from Data Subjects. Particularly, Amadeus facilitate several channels to give thirds related parties the right to access, rectification, erasure, to object to and/or to restrict processing of personal information and the right to lodge a complaint with a supervisory authority (Spanish Data Protection Authority).

Finally, it is important to mention that thought the Speak Up Channel, Amadeus’ stakeholders can inquire or complain about anything related to any violation of privacy, security provisions or policies, among others (see further information in section *Amadeus Speak Up channel and investigations*).

MDR-A - Actions and resources in relation to material sustainability matters - Data privacy

To promote effective implementation of data protection policies, processes and procedures, the following practices have been established (ongoing actions with no specific end date).

Regarding the resources allocated, each of these actions do not surpass the internally established threshold to be classified as significant operational expenditures and/or capital expenditures. This threshold has been defined to align with the materiality threshold for the financial statements.

Key actions - Data privacy

Monitoring of data privacy-related laws and regulations.	
Scope	Amadeus Group
Description	Amadeus actively monitors changes to applicable privacy laws and regulations worldwide to update privacy principles, processes, and practices as required. In 2024, Amadeus has paid special attention to the guidelines and opinions issued by the EDPB (European Data Protection Board) such as the guidelines on the use of facial recognition technologies or the opinion on the role of processors in the supply chain as well as to the new emerging privacy regulations such as India.
Privacy audits	
Scope	Amadeus Group
Description	To comply with policies, procedures, and standards requirements, audits are performed regularly, either by Internal Audit or by independent third party. Consequently, actions plans are established. In 2024, a number of enhancements have been implemented on three processing activities and processes.

¹²⁴ Regarding customer data usage, and as described and indicated in the GDS Privacy Statement, Amadeus uses depersonalized customer data for internal research, analytical and statistical purposes, to identify preferences interests and trends and other activities in the travel industry, and to identify products and services that may be of interest to individuals. Personal data used for analytical purposes is derived from personal data, but when it is used it is in anonymized and aggregated form.

¹²⁵ Amadeus is committed to process any personal data for the sole purpose of executing the purchase order. Personal data will not be transferred to third parties except in cases where there is a legal obligation to do so. Personal data provided will be kept for as long as the relationship is maintained or for as long as necessary in order to comply with applicable data protection laws. The individuals of each Party may exercise, where applicable, their right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object and the right not to be subject to a decision based solely on automated processing by contacting the other Party at the addresses communicated by each Party either in a Purchase Order or in an invoice, and may file a complaint with the appropriate Data Protection Authority.

Key actions - Data privacy

Training and awareness in data privacy related topics	
Scope	Own workforce
Description	Training and awareness is another important pillar of the Privacy Program. Amadeus workforce participate regularly in mandatory training activities to inform them about the main content of the privacy policies and procedures such as what is personal data in our industry, anonymization or personal data minimization. Additionally, awareness-raising actions are carried out throughout the year for which the celebration of the annual Privacy Week around the Privacy Day is a core activity.
Privacy by Design Corporate Standard	
Scope	Amadeus Group
Description	It is also worth mentioning the Privacy by Design Corporate Standard as another of the pillars of the Privacy Program. This standard establishes the process to design products, services and processes involving personal data following and in compliance with Amadeus' privacy principles, identifying any non-compliance or related risks. An Initial Privacy Assessment is conducted for every processing activity, new product, service, application, software or any other that processes personal data. Consequently, mitigation measures and a Data Protection Impact Assessment may be performed when the processing entitles a high risk to the rights and freedoms of the individuals affected.
Data privacy - assessment of suppliers and third parties	
Scope	Vendors and third parties
Description	As part of the Third Party Risk Management process, an assessment of suppliers and third parties with access to personal data is performed to promote they meet the organization's privacy and compliance standards. These assessments cover an evaluation of the vendor privacy practices before engaging (at due diligence), the establishment of appropriate requirements in the contractual negotiation and a regular audit of compliance
Data privacy - requirements for suppliers and third parties	
Scope	Vendors and third parties
Description	Amadeus' privacy principles are shared with third parties. They must maintain, and comply with, comprehensive, documented information security policies, processes, organization and controls that are appropriate, considering the information security risks and aligned with recognized industry standards. They must comply with applicable laws and standards when processing personal data. Contractual clauses are included in this regard, following requirements established by regulators such as EU GDPR or alike regulations

MDR -M - Metrics in relation to material sustainability matters - Data privacy

Critical privacy incidents

Amadeus has both contractual and regulatory obligations not only to adequately protect personal data but also to communicate and notify when personal data is compromised¹²⁶. As result, as of 31st December:

- There were no substantiated complaints received from outside parties and substantiated by the organization concerning breaches of customer privacy.
- Amadeus received one complaint from regulatory bodies.
- There were no critical leaks, thefts, or losses of customer data were identified requiring notification to relevant data protection authorities.

To compile this figure, Amadeus is using guidance issued by the relevant data protection authorities.

¹²⁶ Amadeus has defined an internal process to be followed in case of privacy incident.

Privacy training

In relation to privacy training, during 2024:

As of December 31, 2024

Privacy training completion (%)	98.6 %
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Amadeus employees are automatically added to its data privacy awareness platform. This means that as soon as Amadeus employees have an Amadeus account, they will be enrolled in data privacy campaigns. The company monitors completion per campaign, as the number of employees added to the campaigns varies each month. Here, the company focuses on the completion rate of each campaign for the employees.

MDR-T - Tracking effectiveness of policies and actions through targets - Data privacy

In alignment with Amadeus' commitments, the company updates and adapts its internal processes and standards by considering exemplary practices and setting targets to mitigate potential negative impacts, reduce exposure to risks, and enhance digital trust.

Key targets - Data privacy

Data privacy training completion ¹	
Target	98% privacy training completion in 2025
Scope	Amadeus employees
Baseline value and base year	95% in 2023

¹See section above *MDR - M - Metrics in relation to material sustainability matters - Data Privacy* for more information about this metric and its progress in 2024.

Information about the methodology used to define the target, how Amadeus has considered stakeholders opinion and how the Group is tracking them is included in sections *Sustainability-related goals*, at the *ESRS 2 SBM-1- Strategy, business model and value chain* containing details and *ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies* .

Annex - Additional information on Sustainability (includes Non-Financial Information Statement)

Introduction

As indicated in section *ESRS 2 BP-1- General basis for preparation*, the CSRD should have been transposed in Spain before 6th July 2024. Nevertheless, at December 31, Spain has not implemented the related requirements in local law.

In this context, in November 27 the Accounting and Auditing Institute (ICAC) and the National Securities Market Commission (CNMV) in Spain published a statement on sustainability reports in the interim before transposition of the CSRD Directive in Spain. In their opinion, an undertaking that prepares an annual sustainability report for the year 2024 in accordance with CSRD and ESRS would also be complying with law 11/2018, if certain considerations were observed (differences between Law 11/2018 and ESRS).

Guided by this statement, Amadeus has prepared the Non-Financial Information Statement and sustainability information 2024 in accordance with the CSRD and the ESRS. This report has been completed with specific elements of the law 11/2018, included in this annex. Consequently, even though some topics are not material for Amadeus, according to the results of the double materiality assessment¹²⁷, the company provides details below about certain metrics and information included in the law 11/2018.

To safeguard comparability with figures and, hence, compliance with the requirements of law 11/2018, in this annex Amadeus reports metrics using the same format, methodology and reporting frameworks -mainly the Global Reporting Initiative (GRI)-, applied in previous years to product the Non-Financial Information Statement¹²⁸.

1. Environmental information

Since 2009, the Amadeus Environmental Management System (EMS) is the tool Amadeus uses to measure, report and improve environmental performance.

The Amadeus' Environmental Management System measures the impact of its operations considering five elements: energy, CO₂ emissions, paper, water and waste. Amadeus evaluates its performance considering both total consumption of resources and also efficiency ratios based on the business transactions processed and on the number of employees.

Amadeus Building & Facilities teams at local level are responsible for the optimization of the use of resources at the office buildings. They are supported in specific cases by technical teams that, for example, provide performance indicators relating to the use of resources.

As indicated in section *E1 - 5 - Energy consumption and mix*, the scope of the Amadeus EMS direct reporting reaches 14 of our largest sites across the world, which account 68% of Amadeus employees. The impact of the remaining sites is estimated based on the average consumption factors of the 14 sites.

¹²⁷ See sections *IRO-1- Description of the process to identify and assess material impacts, risks and opportunities* and *SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model*.

¹²⁸ See the Non-financial Information Statement of previous years in the Amadeus website.

- <https://corporate.amadeus.com/documents/en/investors/2024/cnmv/q1/non-financial-information-2023-cnmv.pdf>
- <https://corporate.amadeus.com/documents/en/investors/2022/corporate-governance/non-financial-information-2022.pdf>
- <https://corporate.amadeus.com/documents/en/investors/2021/corporate-governance/non-financial-information-2021.pdf>

Procedures for environmental certifications and evaluations

Note: Not material for Amadeus, but included in Law 11/2018

Some Amadeus sites hold environmental certifications. In this regard, the Amadeus Data Center in Germany has maintained since 2010 the Energy-Efficient certification from TÜV SÜD for its power supply, cooling and climate control processes and IT equipment, as well as its procurement, installation and deinstallation procedures, following a thorough analysis of our infrastructure. The certification has been subsequently renewed in 2012, 2015, 2018 and 2021. The current certification is valid until end of 2024. Amadeus has also extended the data center certification to EN 50600, the new EU standard for data centers that is even broader in scope and more demanding. This certification is valid until 2026. See more information in section *Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation)*.

In addition to EN 50600 Amadeus has achieved an additional certification according to ISO/IEC22237 (Information technology - Data center facilities and infrastructures). This international standard creates the fundamental prerequisite for ensuring that data centers can be planned, built and operated according to the same principles worldwide in the future. With its holistic approach, ISO/IEC22237 covers aspects of data center facilities and infrastructure, including requirements for availability and security as well as the energy efficiency and sustainability of physical infrastructures.

Furthermore, several Amadeus offices, such as the ones in Bad Homburg, Barcelona, Madrid, Nice or Sofia, carry out energy audits every 4 years as required by law. Certain Amadeus office buildings have energy efficiency and/or green building certificates such as the LEED Gold certification of our office building in Bangkok.

Pollution

Note: Not material for Amadeus, but included in Law 11/2018

Given the nature of Amadeus business activities, pollution is not material for Amadeus.

On one hand, in compliance with local legislation, where applicable, Amadeus defines and carries out the controls on the sources of atmospheric emissions at its facilities. The Company does not use any ozone-depleting substances (ODSs), nor does it produce any significant emissions of polluting gases, such as sulphur dioxide (SO_x), nitrogen oxides (NO_x), emissions of volatile organic compounds (VOC) or particulates. Consequently, none of the sources defined have been significant as they do not generate material impacts. Atmospheric pollution-related risks and opportunities have not been assessed as relevant either.

Amadeus has also assessed the pollution impacts, risks and opportunities arising from its value chain, identifying none as material.

Finally, in relation to impacts, risks and opportunities of light and noise pollution, they have not been considered to be significant due to the nature of the activity of the company.

Circular economy and waste management: measures to reuse, recycle or otherwise prevent waste generation and waste food

Note: Not material for Amadeus, but included in Law 11/2018

At Amadeus, waste generation is generally low compared with other sectors or other types of generated impacts, like energy use or greenhouse gas emissions. In general, the work Amadeus and its value chain carry out does not involve generating large volumes of waste, which is mainly generated from kitchens and from general office use -in particular, in the case of own operations-. Relevant risks and opportunities related to circular economy have not been identified either, given the Amadeus activities.

However, the company manages its waste responsibly in order to minimize waste and maximize recycling and reuse. The collection and proper treatment of waste is carried out through the services of waste management companies, that may be suppliers of Amadeus or of the rented building. Furthermore, Amadeus promotes initiatives to raise awareness on circular economy and adequate waste management.

Some practices to reduce waste generation and promote recycling are the following:

- Implementing proper infrastructure to promote classification of waste. In Spain, segregating waste in the appropriate containers is promoted.
- Replacing individual workstation bins with common area bins.
- Communication campaigns to raise awareness among employees to minimize waste and the use of plastic.
- Working with external vendors to improve the measurement and management of waste. For example, in Bangalore, Amadeus’ vendors converted carton boxes and pulps into reusable note pads & pencils and returned them for usage. In Sofia, the collection of waste outside the office to promote and facilitate recycling is coordinated.
- Reusing obsolete PC screens and other electronic equipment. Through the Buyback Program, employees have the opportunity to buy for private usage your end-of-lifecycle corporate devices, including laptops, smartphones, and tablets, at a significantly discounted price.
- Recycling and donating office furniture. In Sydney, for example, laptops, monitors and docking stations have been donated to several foundations.
- Replacing paper cups with glass/ceramic mugs. In sites like London or Madrid we incentivize through small discounts. In Manila, paper cups are avoided.

Additionally, some of Amadeus sites has implemented local actions to reduce food waste. For example, in Nice a percentage over our total waste is sent to compost.

The recycling and waste management companies providing services to Amadeus are the main sources of information for reporting waste. Waste is difficult to measure, since in some cases Amadeus does not have the means or documentation to measure and report it. When Amadeus is one of several tenants of the office building, in many cases it is not possible to obtain data per tenant, or the quantity of waste recycled. On the other hand, waste generated by extraordinary activities, like works done in buildings, is generally measured, but for comparability reasons it is reported separately from regular waste.

Waste - metrics

	2024	2023
Waste generated (kg) ^{1,2}	439,444	304,104

¹Total Amadeus sites worldwide. Figures have been calculated considering the direct reporting of the sites included in the EMS plus the estimation of the rest of the sites.

²For comparability purposes, the figures for waste do not include obsolete equipment or hazardous waste. Total obsolete equipment in 2024 was 16,804 kg (3,859 kg in 2023) and total hazardous waste was 26,456 kg (150 kg in 2023). The percentage of obsolete equipment diverted from disposal (including recycled and donated equipment, and devices purchased by employees in the Amadeus buy-back program) in 2024 was 100% (same as in 2023) and the hazardous waste that was sent for recycling in 2024 was 13% (8% in 2023). For non-hazardous waste, 69% was sent for recycling and 9% for composting (87% in 2023). The increase in obsolete equipment is due to more visibility at global level, incorporating the retired equipment of all Amadeus sites. The increase in hazardous waste is mainly related to building works in Amadeus largest site in Nice.

Water consumption

Note: Not material for Amadeus, but included in Law 11/2018

Managing water resources efficiently is important for the company, despite the fact that Amadeus or its value chain-related activities have not been identified as having a significant environmental impact in terms of water consumption, availability or quality. Nevertheless, Amadeus acknowledges that in specific regions or seasons, water frequently becomes a scarce resource, especially drinking water. This is why Amadeus monitors and aims to minimizing the consumption of water at certain sites.

As a company, it's key to keep a responsible use of water in every action Amadeus takes. Examples of initiatives carried out at its offices worldwide to reduce water consumption:

- At the Data Center, in Erding, continuous water quality tests are carried out to safeguard high water quality standards. With these tests and subsequent increased water quality, Amadeus reduces the need to add new water in the circuits, reducing the overall consumption. In 2022, the drinking water network was upgraded, which resulted in the elimination of a long circulation line between the buildings. The solar system for water heating in building was upgraded as well.
- Implementing motion sensor taps and flow regulators in washrooms. Additionally, in London waterless urinals to male toilets were installed.
- Use of drip irrigation systems with automatic watering set to minimum and plants adapted to the specific climate with low water consumption, are some of the best practices implemented in Nice.
- Use of water-efficient household appliances in kitchens, for instance in Bangalore and Madrid.
- In Nice, the overpressure room has been renovated resizing and optimizing pumps for common use (non-industrial). Consequently, the new electric pumps are smaller and energy efficient and water consumption is reduced.

Additionally, Amadeus carries out communication campaigns among Amadeus employees.

Finally, in relation to material water related risks and opportunities it is important to mention that they have not been identified either.

Water - metrics

The use of water at Amadeus is divided into three categories:

- Water used at office buildings in kitchens, toilets, etc. The amount used for this purpose is relatively low. Thanks to the continuous improvement measures the overall consumption has decreased throughout the years.
- Water used for irrigation. Amadeus' gardens and irrigation system in Nice minimize the use of water since the plants in the garden are adapted to local weather.
- Water used for cooling of servers, principally at the Data Center in Erding. See section above including specific measures implemented in the facilities.

	2024	2023
Water consumption (m ³) ¹	150,512	158,953

¹Total Amadeus sites worldwide. 2024 figures have been calculated considering the direct reporting of 13 Amadeus sites, which represent 66% of the total Amadeus workforce, and estimating the remaining sites based on their average consumption per FTE. Similarly, 2023 figures were calculated considering the direct reporting of the 14 sites included in the EMS plus the estimation of the rest of the sites.

Use of raw materials

Note: Not material for Amadeus, but included in Law 11/2018

As an IT company, the consumption and use of raw materials is not relevant in Amadeus. The company does not generate material related impacts through its own and/or value chain operations, neither has identified related risks and opportunities regarding to the use of raw materials.

Nevertheless, Amadeus voluntary reports paper consumption at its premises either by summing up the amount of paper bought during the year or, when available, through automated badge-based printing system. These automated systems permit a more precise monitoring of use and facilitate the identification of areas for improvement.

Examples of initiatives carried out at our offices worldwide to reduce paper consumption are:

- Implementing badge-based printing systems.
- Use of carbon-neutral paper.
- Setting printers by default to black-and-white double-sided printing.
- Raising awareness among users of the environmental and economic cost of printing.
- Use of recycled paper.
- Sending used paper for recycling.
- Implementing electronic signature to reduce the printing and delivery of hard-copy contract versions.
- Reducing paper advertising replacing it by digital means.

	2024	2023
Paper consumption (kg)	19,209	18,135

Energy consumption (direct and indirect)

Note: Additional disclosure requirements beyond those provided in section E1 - 5 - Energy consumption and mix to ensure comparability with the information disclosed in previous years

	Energy consumption ^{1,2}	
	2024	2023
Electricity consumption at Amadeus sites (GJ) ²	153,574	142,297
Number of employees (average FTEs)	20,893	18,632
Electricity consumption per FTE (GJ) ²	7.35	7.64
Electricity consumption at Amadeus data center (GJ)	221,994	230,020
Number of transactions processed at the data center (millions)	1,833.8	1,654.7
Electricity required per one million transactions (GJ)	121.1	139.0
Total electricity consumption Amadeus sites and data center (GJ)	375,568	372,318
Natural gas (GJ)	21,503	23,749
Diesel oil (GJ)	4,299	4,047
Total energy consumption Amadeus sites and data center (GJ)	401,371	400,114

¹ Scope: Total Amadeus sites worldwide.

³ Consumption figures are reported in MWH in section E1 - 5 - Energy consumption and mix, while in this table, data is disclosed in GJ.

² Does not include Amadeus data center.

	Type of fuel used for electricity generation (GJ) ¹						
	2024						
	Coal	Fuel Oil	Natural Gas	Biofuel	Waste	Other ²	Total
Amadeus sites worldwide (excluding the Data Center)	115,051	6,191	56,358	7,889	2,291	86,925	274,705
Data Center ³	0	0	0	0	0	221,994	221,994

	2023						
	2023						
	Coal	Fuel Oil	Natural Gas	Biofuel	Waste	Other ²	Total
Amadeus sites worldwide (excluding the Data Center)	104,108	6,139	61,914	9,902	3,049	76,017	261,130
Data Center ³	0	0	0	0	0	230,020	230,020

¹All figures expressed in gigajoules equivalent, obtained from the energy mix data of each country and the energy-transformation efficiency factor for each type of energy source.

²Other: Nuclear, hydropower, geothermal, photovoltaic, solar thermal, wind power, tidal power and other sources. Amadeus offices in London and Manila were covered by Guarantees of Origin (GOs) of renewable energy or equivalent instruments and have been accounted under this category.

³In 2024, Amadeus purchased Guarantees of Origin (GOs) of renewable energy from hydropower plants in Northern Europe for all electricity used at the Data Center. Without considering the use of GOs; the energy mix for the Data Center would result in the following split, calculated as per the German energy mix: Coal: 220,804; Fuel Oil: 4,866; Natural Gas: 86,322; Biofuel: 41,760; Waste: 12,135; Other: 92,565; Total: 458,451.

Greenhouse gas emissions

Note: Additional disclosure requirements beyond those provided in section E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions to ensure comparability with the information disclosed in previous years

	CO ₂ emissions (t CO ₂) ¹	
	2024	2023 ²
Scope 1. Direct emissions (fossil fuels)	1,827	2,082
Scope 2. Indirect emissions from purchased electricity (market based)	13,677	13,339
Scope 3. Indirect emissions from other sources	193,961	181,485
CO ₂ emissions (Scopes 1 and 2) per FTE	0.74	0.83
Carbon offset ⁴	27,779	17,491
Natural gas (m ³)	559,809	618,264
Diesel oil (l)	111,343	104,826

¹ All figures in t of CO₂ unless otherwise indicated.

Scope: Total Amadeus sites worldwide. Figures have been calculated considering the direct reporting of the 14 sites included in the EMS plus the estimation of the rest of the sites. This estimation is based on the average consumption reported by the EMS sites. See more details in section E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions

² 2023 scope 1 figures have been restated as Amadeus revisited its CO₂ emissions inventory calculations in order to validate its carbon emissions reduction targets with the SBTi. The change in scope 1 emissions is due to the inclusion of refrigerant gases. The scope 1 emissions previously reported for 2023 were 1,427 t of CO₂, i.e., the restatement implies an increase of 46%.

2023 scope 3 figures were also restated to obtain validation of Amadeus science-based targets by the SBTi. See table below.

⁴ In 2024 Amadeus offset emissions from business travel (15,707 t of CO₂) and the proportion of combined Scopes 1&2 (12,072 t of CO₂) required to meet Amadeus' commitment on carbon neutrality by 2025 progressively, with the baseline year of 2021.

	CO ₂ emissions Scope 3 (t CO ₂ e) ¹	
	2024	2023 ²
1. Purchased goods and services	139,948	136,301
2. Capital goods	21,492	18,119
3. Fuel- and energy related activities (not included in scope 1 or scope 2)	8,684	7,725
4. Upstream transportation and distribution	43	33
5. Waste generated in operations	50	22
6. Business travel	15,707	11,940
7. Employee commuting	5,852	6,926
Total Scope 3 upstream emissions	191,776	181,064
15. Investments	2,185	420
Total Scope 3 downstream emissions	2,185	420
Total Scope 3	193,961	181,485

¹ Scope: Total Amadeus sites worldwide. All figures in t of CO₂ unless otherwise indicated.

² 2023 figures have been restated as Amadeus revisited its CO₂ emissions inventory calculations in order to validate its carbon emissions reduction targets with SBTi. As a result, scope 3 emissions decreased by 23%, mainly due to the removal of category 8 (refrigerant gases emissions accounted under scope 1) and category 11 (downstream emissions related to the use of software are outside the minimum boundary and should be separated from the mandatory reporting).

Biodiversity protection

Note: Not material for Amadeus, but included in Law 11/2018

Due to the nature of Amadeus operations, the Company does not generate material biodiversity impacts, nor positive or negative through its own operations or its value chain. Additionally, biodiversity related risks have not been either identified as relevant through the double materiality assessment. This is due to the fact that the Group's sites are located in office buildings in urban areas or dedicated industrial estates and that the company operates primarily in the IT sectors. Additionally, Amadeus land use is not intensive, and its contribution to land degradation is therefore limited.

Nevertheless, Amadeus has participated in joint industry sustainability projects to protect the biodiversity together with partners and/or customers. These include reforestation initiatives and schemes to clean up natural environments and collect plastics. For example, during the volunteer month in 2024, employees from the London and Indonesia Amadeus office participated in activities to contribute to habitat preservation. Additionally, in Colombia, volunteers helped to preserve their local natural heritage by planting trees.

2. Own workforce information

Employment

Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-6 - *Characteristics of the undertaking's employees* to ensure comparability with the information disclosed in previous years

Number of employees by gender, age, and professional category as of December 31 (headcount)¹

	As of December 31, 2024				As of December 31, 2023 ²			
	VPs and directors	Senior managers & managers	Staff	Total	VPs and directors	Senior managers & managers	Staff	Total
By age range								
<30		48	3,513	3,561	0	50	3,197	3,247
30-50	79	4,963	8,080	13,122	76	4,442	7,267	11,785
>50	153	2,118	1,689	3,960	141	1,875	1,582	3,598
By gender								
Male	173	4,650	7,991	12,814	167	4,180	7,119	11,466
Female	59	2,479	5,291	7,829	50	2,186	4,927	7,163

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcounts as of the end of the reporting period. 2023 figures about gender "Other" have not been included.

² Associate Directors are included under Senior Managers and Managers category.

Number of employees by employment type and contract as of December 31 (headcount)¹

	As of December 31, 2024			As of 31st December 2023		
	Permanent	Temporary	Total	Permanent	Temporary	Total
Full-time	19,644	196	19,840	17,649	189	17,838
Part-time	801	2	803	786	6	792

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcounts as of the end of the reporting period.

See section S1-6 - *Characteristics of Amadeus' employees* containing definitions of permanent and temporary employee, as well as full-time and part-time.

Annual average of contracts by employment type and gender (headcount)¹

	2024 (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Male	11,804.5	221.5	12,026.0	104.0	1.5	105.5
Female	6,828.5	571.0	7,399.5	88.0	3.0	91.0

	2023* (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Male	10,674	209	10,883	120	1	121
Female	6,297	565	6,862	90	3	93

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. The information provided refers to the average number of contracts, for all employees in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. The average headcount is obtained by adding the starting and ending headcount and dividing over 2. Figures regarding the gender category "Other" are included in the "Male" category.

See section S1-6 - Characteristics of Amadeus' employees containing definitions of permanent and temporary employee, as well as full-time and part-time.

Annual average of contracts by employment type and age (headcount)¹

	2024 (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
<30	3,262.0	11.5	3,273.5	128.0	1.5	129.5
30-50	11,909.0	476.5	12,385.5	59.0	1.5	60.5
>50	3,462.0	304.5	3,766.5	5.0	1.5	6.5

	2023* (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
<30	2,889	14	2,903	143	2	145
30-50	10,863	473	11,336	63	2	65
>50	3,221	286	3,507	5	0	5

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. The information provided refers to the average number of contracts, for all employees in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. The average headcount is obtained by adding the starting and ending headcount and dividing over 2. Associate Directors are included under Senior Managers and Managers category while CEO is under VPs and Directors.

See section S1-6 - Characteristics of Amadeus' employees containing definitions of permanent and temporary employee, as well as full-time and part-time.

Annual average of contracts by employment type and professional category (headcount)¹

	2024 (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
VPs and directors	227.0	1.5	228.5	0.0	0.0	0.0
Associate Directors, Senior Managers and Managers	6,430.0	298.5	6,728.5	13.0	1.0	14.0
Staff	11,976.0	492.5	12,468.5	179.0	3.5	182.5

	2023 (headcount, in average)					
	Permanent			Temporary		
	Full-time	Part-time	Total	Full-time	Part-time	Total
VPs and directors	212	2	214	0	0	0
Associate Directors, Senior Managers and Managers	5,731	278	6,009	9	1	10
Staff	11,031	495	11,526	202	3	205

¹Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. The information provided refers to the average number of contracts, for all employees in controlled companies. Associate Directors are included under Senior Managers and Managers category while CEO is under VPs and Directors.

See section S1-6 - Characteristics of Amadeus' employees containing definitions of permanent and temporary employee, as well as full-time and part-time.

Dismissals by age, gender and professional category as of 31st December (headcount)¹

	As of 31st December 2024 (headcount)				As of 31st December 2023 (headcount)			
	VPs and directors	Associate Directors, Senior managers & managers	Staff	Total	VPs and directors	Associate Directors, Senior managers & managers	Staff	Total
<30	0	0	38	38	0	0	131	131
Male	0	0	32	32	0	0	92	92
Female	0	0	6	6	0	0	39	39
Between 30 and 50 years old	0	29	122	151	0	38	111	149
Male	0	20	84	104	0	24	69	93
Female	0	9	38	47	0	14	42	56
>50	1	29	41	71	9	44	36	89
Male	1	23	23	47	7	33	22	62
Female	0	6	18	24	2	11	14	27

¹Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies. Figures do not include the entities considered as Joint Ventures and Associates. Headcount as of the end of the reporting period. Figures regarding the gender category "Other" have not been included.

Associate Directors are included under Senior Managers and Managers category. This table only shows involuntary termination, while in section S1-6 - Characteristics of Amadeus' employees, employees terminated voluntarily and involuntarily have been included. Additionally, in 2024 dismissals and redundancy categories have been considered.

Remuneration

Note: Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-16: *Remuneration metrics (pay gap and total remuneration)* to ensure comparability with the information disclosed in previous years

Average remuneration shown below refers to total target compensation (base salary, target annual bonus and target long-term incentive).

In relation to average remuneration by level, it is important to clarify that typically, each level is made up of a number of different positions with different salaries ranges. The salaries are also reflective of Amadeus global locations and we are using a consistent fix rate for the month prior to the reporting.

Variations between 2024 and 2023 are impacted by the exchange rate evolution, the difference in workforce composition, both by level and global footprint, and the different salary review increase rate as applied to the wider workforce.

Average remuneration by gender, age and professional category

Average remuneration by gender (euros) ¹		
	2024	2023
Female	€66,469	€63,414
Male	€74,983	€72,441
Average remuneration by age (euros)		
	2024	2023
<30 years	€31,361	€30,074
30-50 years	€70,968	€68,539
>50 years	€115,444	€109,975
Average remuneration by level ¹ (euros)		
	2024	2023
Executive level	€324,036	311,979
Management level	€154,430	147,899
Non-management level	€60,188	57,876

¹ Data extracted from the Group's ordinary system (Workday), including all permanent and temporary employees of Amadeus IT Group in controlled companies.

Average remuneration of the directors and executives

The average remuneration of the directors and executives, including the variable remuneration, allowances, indemnities, the payment to long-term savings systems and any other compensation element broken down by gender (euros)

	2024		2023	
	Female	Male	Female	Male
Board of Directors ¹				
External Directors	€134,865	€151,321	€134,865	€127,149
Executive Director ²		€3,985,191		€3,905,438
Executives ³	€260,786	€328,304	€260,303	€330,495

¹ Remuneration paid to External Directors consists of an annual fixed fee for chairmanship / membership of the Board, plus an additional annual fixed fee for chairmanship / membership of the Board's committees. Hence, total remuneration received by External Directors only depends on the time they serve on the Board during the year, and whether they are also members of one or more of the Board's committees during part or the full year.

² Executive Director includes Base Salary + Fees for the membership of the Board of Directors + Long-term savings + Benefits + Long Term Incentive Plan + Annual Bonus accrued for the current fiscal year. Please, bear in mind that section S1-16: Remuneration metrics (pay gap and total remuneration) includes actuals compensation package effectively paid in 2024.

³ Includes the Company's Executive Committee as well as other individuals with senior leadership responsibilities (referred to as Executive Level in the previous remuneration tables). Average remuneration shown above refers to total paid compensation during the correspondent year broken down by gender (base salary, annual bonus and long-term incentive received in the fiscal year, but may be in reference to the prior performance year).

Weighted pay gap (average compensation)

To ensure comparability with figures reported in previous years, Amadeus has decided to report the gender pay gap using the same methodology applied previously, as well as the one defined by the ESRS (see section S1-16: Remuneration metrics (pay gap and total remuneration)).

In this regard, the weighted gender pay gap (average), shown as a percentage, is calculated as the difference between the total average compensation of male employees and the average compensation of female employees, divided by the average compensation of male employees, by employee level (see tables above):

	Weighted pay gap (average compensation)	
	2024	2023
Executive level	18.1 %	15.6%
Management level	4.6 %	4.9%
Non-management level	5.9 %	6.5%
Total (weighted average)	5.9 %	6.4%

The overall gender pay gap has been decreasing in the last years. This is in part related to the strategic initiatives at Amadeus focusing on minimizing gender pay gaps.

The difference year-on-year in the gender pay gap (average compensation) in the Executive level is explained by several factors: attrition and hiring, the number of positions with different salaries ranges included in the executive level and the prevalence of men in the higher positions within this level. Because this level is the smallest segment by headcount, the gap is naturally very sensitive to employee turnover.

On the other hand, the gender pay gap (average compensation) in Management and Non-Management levels, which are the levels with a highest headcount, has decreased as well. This is in part related to the strategic initiatives at Amadeus focusing on minimizing gender pay gaps. As indicated in section S1-16: Remuneration metrics (pay gap and total remuneration), this work is fundamental to Amadeus' DEI strategy and the ESG Ambition.

Weighted gender pay gap (median compensation)

The gender pay gap (median), shown as a percentage, is calculated as the difference between the median compensation of male employees and the median compensation of female employees, divided by the median compensation of male employees, by employee level (see tables above):

Weighted gender pay gap (median compensation)		
	2024	2023
Executive level	9.8 %	13.3%
Management level	10.6 %	8.2%
Non-management level	6.6 %	7.7%
Total (weighted average)	7.0 %	7.8%

The overall gap has decreased since last year.

Employees with disabilities

Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-12– *Persons with disabilities* to ensure comparability with the information disclosed in previous years

Employees with disabilities ¹		
	2024	2023
Number of employees with disabilities	263	226

¹ Data obtained manually from each region where Amadeus operates and consolidated by P&C. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.

Absenteeism

Note: Additional disclosure requirement, as outlined in Law 11/2018

Number of absenteeism hours ¹		
	2024 ²	2023
Male	250,830	790,436
Female	424,696	507,536
Total	675,526	1,297,972

¹ An employee absents from work because of incapacity of any kind, not just as the result of work-related injury or disease. Permitted leave absences such as holidays, study, maternity or paternity leave, and compassionate leave are excluded (following Global Reporting Initiative standards).

Data collected manually and consolidated by P&C at Amadeus. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.

² In 2024, the absenteeism rate was 1,9% approximately (Absenteeism rate = (Total number of absenteeism hours / Total number of hours worked) x 100).

Health and safety

Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-14 - *Health and safety metrics* to ensure comparability with the information disclosed in previous years

Work-related injuries per type and gender ¹				
	2024		2023	
	Female	Male	Female	Male
Neck or back	6	5	8	6
Bone	1	1	1	3
Soft Tissue	0	4	1	1
Burns	0	1	0	0
RMI	0	0	0	0
Other	15	11	8	20
Total	22	22	18	30

Work-related injuries and ill rates per gender				
	2024		2023	
	Female	Male	Female	Male
Total Injuries	22	22	18	30
Injury Rate ²	1.56	0.96	1.65	1.76
Occupational Disease Rate ³	0	0	0	0
Lost Day Rate ⁴	0.04	0.004	0.62	0.16

¹Raw data collected manually and consolidated by P&C at Amadeus. Figures regarding the gender category "Other" have not been included. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.

²Injury rate calculated based on the number of injuries/ the effectively worked hours in the year* 1,000,000.

³Occupational Disease Rate calculated based on the Occupational diseases/ the effectively worked hours in the year* 10,000.

⁴Lost Day Rate calculated based on the total number of lost working dates/ the effectively worked hours in the year* 1,000.

Social dialogue - Relationship with employees

Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-8 - *Collective bargaining coverage and social dialogue* to ensure comparability with the information disclosed in previous years

Total Workforce by main countries/ regions covered with collective agreements¹ (percentage)

Country	2024	2023
France	100.0%	100%
United States	0.0%	0%
India	0.0%	0%
Germany	78.5%	67%
Spain	100.0%	100%
United Kingdom	0.0%	0%
Philippines	0.0%	0%
Australia	72.6%	73%
Thailand	0.0%	0%
Singapore	0.0%	0%
Turkey	0.0%	0%
Ukraine	0.0%	0%
Bulgaria	0.0%	0%
Netherlands	0.0%	0%
Colombia	0.0%	0%
United Arab Emirates	0.0%	0%
Others	16.9%	22%
Total	40.2%	42%

¹ Data obtained manually from each region where Amadeus operates and consolidated by P&C at Amadeus. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group.

Training

Note: Note: Additional disclosure requirements as outlined in Law 11/2018 beyond those provided in section S1-13 - *Training and skills development metrics* to ensure comparability with the information disclosed in previous years

Total number of hours of training by professional category and gender¹

	2024			2023		
	Male	Female	Total	Male	Female	Total
SVPs, EVPs and VPs	224.0	46.5	270.5	175.4	16.3	191.7
Directors	1,706.4	701.1	2,407.5	2,480.6	938.4	3,419.0
Associate directors	5,322.5	2,620.3	7,942.8	3,276.3	1,151.9	4,428.2
Senior managers	25,157.8	15,290.7	40,448.4	16,097.6	7,933.7	24,031.3
Managers	70,855.1	43,608.5	114,463.5	63,491.0	34,774.2	98,265.1
Staff	181,561.9	116,898.8	298,460.7	149,578.4	90,670.8	240,249.1
	284,827.6	179,165.9	463,993.5	235,099.2	135,485.3	370,584.5

¹Total training hours offered to and completed have been considered, including CEO's learning hours in 2024. Amadeus subsidiaries Vision Box and Voxel (accounting for 3,5% of total Amadeus employees) have not been included, due to their integration during 2024 in the Group. Data has been extracted from Amadeus Ordinary systems (Workday, LinkedIn, PluralSight, Coursera, O'Reilly and RedHat). Figures regarding the gender "Other" have not been included.

Average number of trainings by gender and employee category¹

	2024			2023		
	Male	Female	Total	Male	Female	Total
SVPs, EVPs and VPs	6.8	11.6	7.5	6.1	5.4	6.0
Directors	11.8	12.3	11.9	17.1	19.2	17.6
Associate directors	20.8	27.6	22.6	13.3	12.3	13.0
Senior managers	24.6	30.6	26.6	17.3	17.8	17.5
Managers	20.9	22.9	21.6	20.1	20.5	20.3
Staff	21.8	20.9	21.4	18.8	16.8	18.0

¹ To calculate the indicator, the total number of employees (active or inactive) who have completed at least one training in 2024 has been considered as denominator, according to the following formula:
Average number of hours of training per employee = Number of total hours offered and completed by employees/Total number of employees completing one training in 2024

Figures regarding the gender "Other" have not been included. Data has been extracted from Amadeus Ordinaty systems (Workday, LinkedIn, PluralSight, Coursera, O'Reilly and RedHat).

Accessibility

Note: Not material for Amadeus, but included in Law 11/2018

The Amadeus People Policy encompasses its commitment to safeguarding the rights of employees with disabilities to equal opportunities and fostering an environment that supports inclusivity. In this context, throughout 2024, Amadeus has been developing its new accessibility strategy. The primary commitment of this strategy is to provide an accessible workplace at a group level, enabling Amadeus employees to thrive. Actions and targets to be achieved in the coming years have been outlined.

As a starting point, the company considers the existing measures to develop and promote an accessible workplace, from hiring processes to necessary adaptations in the work environment. For instance, in locations such as Madrid and Nice, Amadeus implements individualized accessibility actions for each employee with disabilities, providing the necessary tools and support for their daily activities. In the United States, Amadeus operations comply with the Americans with Disabilities Act, continuously addressing accommodation requests due to disabilities for employees and applicants.

In the short to medium term, the new accessibility strategy focuses on ensuring that Amadeus' premises, tools, and workplace are both physically and digitally accessible.

Societal information

Note: Not material for Amadeus, but included in Law 11/2018

“Driving social impact” is one of the four commitments included in the Amadeus sustainability strategy, the ESG Ambition. This commitment is based on three pillars to enhance the impact on stakeholders.

- Local communities. Supporting neighbors, promoting inclusive and sustainable development in the local communities where Amadeus operates. The company engages people in the Community Impact program through volunteering, fundraising and active citizenship in collaboration with NGOs.
- Technological solutions. Developing inclusive travel technology. Amadeus wants to design solutions that are digitally accessible for everyone, that facilitate accessible travel and that improve the travel experience from search and booking through to the airport and at the destination.
- Industry. Promoting a more inclusive travel and tourism industry by supporting SMEs and travel professionals. Amadeus offers specialized digital training and startup programs with a focus on SMEs that have sustainability at the core of their business.

In 2024, Amadeus has consolidated its social strategy through the effective implementation of its three pillars and the development of several actions.

Local communities - Community Impact Program

In 2024, Amadeus has evolved its Community Impact Program by re-designing its framework and operational model. The Community Impact Program initiatives focus on long-term projects and are linked to Amadeus’ core business through three strategic themes.

- Advancing digital inclusion at different levels of society, contributing to improving digital skills of vulnerable groups through promoting STEM (science, technology, engineering and mathematics) careers and education, and facilitating access to digital technologies through resources and volunteering
- Building skills for jobs in travel and tourism by participating in training and mentoring programs to help people develop skills to work in travel and tourism.
- Supporting destinations by helping people in vulnerable situations cover basic needs, and support the environmental preservation of areas that are key for destinations.

As a result, in 2024, among others:

- Community Impact Program activities were rolled out at more than 81 sites 50 countries.
- The number of volunteering hours employees can dedicate annually to corporate volunteering initiatives during work time were double from 8h to 16h. Additionally, the the sixth edition of the newly rebranded Amadeus Volunteer Month was held.
- The Community Impact Network, consisting of close to 100 champions who implement the strategy at local sites, was reinforced.

Technological solutions

Amadeus aims at facilitating equal access to its products and services and develop solutions that enable and promote inclusive and conscious travel, by:

- Ensuring accessibility of Amadeus products, adapting, designing and building digital products that everyone can easily interact with (for example, Cytric, Amadeus Discover, or Vision-Box related products). Amadeus is working toward a comprehensive approach that enables compliance with the European Accessibility Act (EAA).
- Developing solutions for inclusive and conscious travel, to improve the travel experience for underserved travelers. In 2024, Amadeus launched an Accessibility Services Task Force with key industry players, including airlines, airports and travel sellers. Additionally, the company worked at industry level to generate knowledge on accessible travel and partnered with the Airports Council International (ACI) to create a guide that brings together exemplary practices and recommendations on accessible travel.

Industry

The objective is to empower impact-driven businesses within the sector by collaborating with industry partners to advance social innovation.

- Upskilling industry professionals and students to generate impact. In 2024, Amadeus continued to focus on making learning experiences available to customers to upskill their workforce, making. Furthermore, the company also provided customized instructor-led training sessions on demand and a set of user guides to enhance the learning process.

Additionally, the company collaborates with 1000+ travel and tourism schools in 70+ countries.

- Helping the smallest players of the industry thrive through the Amadeus startup programs. More than 700 travel and tech startups have been benefited from accessing to the Amadeus APIs¹²⁹ catalog through the Amadeus for Developers self-service portal; the support of the Amadeus Launchpad team to launch, grow and scale their business; or the feedback and advice from the Amadeus Ventures team.

Moreover, sustainable and impact-driven SMEs in travel and tourism have benefited from new opportunities provided by Amadeus with the launch of an expert support volunteering program.

- Fostering social innovation through partnerships. The fourth edition of Travel4Impact program was launched in 2024, offering training, mentoring and networking opportunities to impact-driven SMEs in travel and tourism. More than 120 small sustainable businesses have been supported since the inception of this program.

Additionally, Amadeus also became a partner of the Social Entrepreneurship Competition in Tourism in 2024, being part of the jury and contributing to the selection of the finalists and offering expert support and communication amplification through the corporate channels.

Contributions to non-profits organizations

	2024	2023
Contribution to non-profit organizations (€)	€323,112	€324,769

¹²⁹ Application programming interface, a language that enables communication between computer programs. The portal enables developers to create high-quality apps and deliver them to the market quickly.

Customer services

Note: Not material for Amadeus, but included in Law 11/2018

Amadeus develops and delivers a range of services to maximize customers' efficiency, business continuity and performance, including learning, support, automation, content and security management services. The company has built a strong local, regional and global customer service presence in order to promote proximity to its customers¹³⁰.

Due to the nature of its operations, the company does not generate significant impacts on the health of its customers. The primary related impacts, risks, and opportunities could be associated with other issues. Nevertheless, Amadeus incorporates responsible principles to safeguard the safety of its clients in these areas. For further details, please refer to the sections on *Cybersecurity (entity specific)* and *Data Privacy (entity specific)*.

Amadeus' Customer Experience program (called Amadeus Listens) collects the voice of its customers to identify from their perspective, areas for improvement and areas of excellence. This program monitors customer loyalty and satisfaction across the stages of customers' relationship with Amadeus.

The approach is to gather feedback through a range of interviews and surveys, focusing on customers' relationship with Amadeus employees, their specific interactions along the customer journey and their experience using the services.

This way, customer feedback may be transformed into actionable insights that teams across Amadeus will use to improve their performance. The feedback is also key to defining Amadeus' strategic investments. Amadeus encourages customers to actively participate in the design of its action plans, informing them regularly of the progress made.

Net Promoter Score (NPS)

Amadeus' main measure of customer loyalty is the Net Promoter Score (NPS), tracked year on year. Since 2024 Amadeus is using a weighted NPS measurement, meaning that each business area's NPS is based on its revenue contribution.

In 2024, over 17,000 customers responded to the annual relationship survey, in addition to 90 interviews with senior executives from key customers. Amadeus has recorded an NPS of +40. This score is a slight decrease from the 2023 NPS of +43¹³¹, but is ahead of our target NPS of +34. Also, 78% of these customers confirmed to be satisfied with their relationship with Amadeus.

Going forward, Amadeus continues to have an internal NPS target (as per weighted average of revenue), of +34 for 2025.

Compliments & Complaints

Customers may leave a complaint or provide a compliment through the Amadeus website¹³². During the year, Amadeus received 273 complaints and 70 compliments (369 and 69 respectively in 2023).

¹³⁰ Through this section, Amadeus responds to request of information by Law 11/2018, in relation to its customers services. Please note that Amadeus is a B2B company. It directly serves business customers, not end-users or consumers as it could be considered by the definition provided in ANNEX to the Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards and the Question ID 1026 – Definition of end users, included in Compilation of Technical Explanations. These documents are available at:

- https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302772
- <https://www.efrag.org/sites/default/files/media/document/2024-12/Explanations%20January%20-%20November%202024.pdf>

See more information about customers at Amadeus in section ESRS 2 SBM-1- Strategy, business model and value chain, Amadeus' products and services, business model and value chain, Downstream.

¹³¹ This figure differs from the +52.2 2023 NPS previously reported in the Amadeus Non-Financial Information Statement 2023, as the new weighted NPS measurement methodology has been applied retroactively for comparison.

¹³² <https://amadeus.com/en/contact>

The complaints within the scope of Amadeus were resolved and passed on to the concerned departments and teams as an area of improvement.

In 2025, Amadeus will continue to focus on improving the Customer experience. Amadeus will also try to add new ways of collecting feedback to make insights more meaningful and actionable.

Fiscal information

The required tax information has been included in section *Fair and transparency tax practices (entity specific)*, including related metrics.

Table of contents as required by Law 11/2018

To facilitate the traceability of the information derived from the requirements of law 11/2018, the table below specifies the sections of the Non-Financial Information Statement and sustainability information where these contents can be found.

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
Business model				
• Business environment	NA	ESRS 2 - SBM-1- Strategy, business model and value chain	ESRS 2 SBM-1- Strategy, business model and value chain, sections Amadeus' products and services, business model and value chain, Upstream, Downstream	20
• Organization and structure	NA	ESRS 2 - SBM-1- Strategy, business model and value chain	ESRS 2 SBM-1- Strategy, business model and value chain, sections Amadeus' products and services, business model and value chain, Upstream, Downstream, Headcount of employees by geographical areas	20, 25
• Geographical presence and markets	NA	ESRS 2 - SBM-1- Strategy, business model and value chain	ESRS 2 SBM-1- Strategy, business model and value chain, graphic Amadeus' presence around the world	24
• Objectives and strategy	NA	ESRS 2 - SBM-1- Strategy, business model and value chain	ESRS 2 SBM-1- Strategy, business model and value chain, section Sustainability-related goals	25
• Principal factors and trends that affect future evolution	NA	SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model GOV-5 – Risk management and internal controls over sustainability reporting	ESRS 2 GOV-5 – Risk management and internal controls over sustainability reporting, ESRS 2 S SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model, ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to fair and transparency tax practice, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Cybersecurity, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Data privacy	15, 44, 66, 89,127,149,158,163
General				

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Reporting framework	NA	ESRS 2 - BP-1 General basis for preparation of sustainability statement ESRS 2 - BP-2- Disclosures in relation to specific circumstances	ESRS 2 BP-1- General basis for preparation of the sustainability statement, ESRS 2 BP-2- Disclosures in relation to specific circumstances	1, 3
Management approach				
• Description of the policies the Group applies and its results	NA	ESRS 2 - MDR-P Policies adopted to manage sustainability matters E1-2 Policies related to climate change mitigation and adaptation S1-1 Policies related to own workforce G1-1 Business conduct policies and corporate culture ESRS 2 - MDR-M - Metrics in relation to material sustainability matters	E1 - 2 - Policies related to climate change mitigation and adaptation, S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages, S1-1 Policies related to own workforce - Working time, work-life balance and health and safety, S1-1 Policies related to own workforce - Working time, work-life balance and health and safety, S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value, S1-1 Policies related to own workforce - Training and skills development, including talent attraction and retention, G1-1 - Business conduct policies and corporate culture, G1-2 - Management of relationships with suppliers, section Key Policies - Relationships with suppliers, G1-5 - Political influence and lobbying activities, Fair competition, MDR-P - Policies adopted to manage material sustainability matters - Fair and transparency tax practices, MDR-P - Policies adopted to manage material sustainability matters - Cybersecurity, MDR-P - Policies adopted to manage material sustainability matters - Data privacy	72, 92, 101, 110, 119, 128, 136, 143, 146, 149, 158, 163
• Risks linked to company activity	NA	ESRS 2 - SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model GOV-5 – Risk management and internal controls over sustainability reporting	ESRS 2 GOV-5 – Risk management and internal controls over sustainability reporting, SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model, ESRS 2 – SBM-3 - S1 - Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 - IRO-1 Description of the processes to identifying and assess material impacts, risks and opportunities - Business conduct, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to fair and transparency tax practice, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Cybersecurity, ESRS 2 - SBM-3 - G1 (Entity specific) - Material impacts, risks and opportunities related to Data privacy	15, 44, 66, 89, 127, 149, 158, 163
Environmental matters				
Environmental management				

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Current and future potential impact of company operations over the environment	■	ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model	<i>SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>	44, 66
• Procedures for environmental certifications and evaluations	✕	GRI 3-3 Management of material topics	<i>Procedures for environmental certifications and evaluations</i>	170
• Dedicated resources to prevent environmental risks	■	ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model	<i>ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>	44, 66
• Application of the precautionary principle	■	ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model	<i>ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>	44, 66
• Provisions in relation to environmental risks	■	ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model	<i>ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model, ESRS 2 – SBM-3 - E1 - Material IROs and their interaction with strategy and business model</i>	44, 66
Pollution				
• Pollution: measures to prevent, reduce or restore carbon emissions	✕	GRI 3-3 Management of material topics	<i>Pollution</i>	170
Circular economy and waste management:				
• Circular economy and waste management: measures to reuse, recycle or otherwise prevent waste generation and waste food	✕	GRI 3-3 Management of material topics GRI 306-1 Waste generation and significant waste related impacts GRI 306-2 Management of significant waste related impacts GRI 306-3 Waste generated	<i>Circular economy and waste management: measures to reuse, recycle or otherwise prevent waste generation and waste food, Waste - metrics</i>	170, 171
Sustainability used of resources				
• Water consumption	✕	GRI 303-1 Interactions with water as a shared resource GRI 303-3 Water withdrawal	<i>Water consumption, Water - metrics</i>	172, 172
• Use of raw materials	✕	GRI 3-3 Management of material topics GRI 301-1 Materials used by weight or volume	<i>Use of raw materials</i>	173
• Energy consumption (direct and indirect)	■	E1 - 5 - Energy consumption and mix	<i>E1 - 5 - Energy consumption and mix, Energy consumption (direct and indirect)</i>	79,174

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Measures to improve energy efficiency	■	E1 - 3 - Actions and resources in relation to climate change policies ESRS 2 MDR-A - Actions and resources in relation to sustainability matters E1 - 5 - Energy consumption and mix	<i>E1 - 3 - Actions and resources in relation to climate change policies, E1 - 5 - Energy consumption and mix</i>	74,79
• Renewable energy use	■	E1 - 3 - Actions and resources in relation to climate change policies ESRS 2 MDR-A - Actions and resources in relation to sustainability matters E1 - 5 - Energy consumption and mix	<i>E1 - 3 - Actions and resources in relation to climate change policies, E1 - 5 - Energy consumption and mix</i>	74,79
Climate change				
• Greenhouse gas emissions	■	E1 - 6 - Gross Scopes 1, 2, 3	<i>E1 - 6 - Gross Scopes 1, 2, 3 and total GHG emissions, Greenhouse gas emissions</i>	81, 175
• Measures to adapt to climate change	■	E1 - 1- Transition plan for climate change mitigation MDR-A - Actions and resources in relation to sustainability matters E1 - 3 - Actions and resources in relation to climate change policies	<i>E1 - 1- Transition plan for climate change mitigation, E1 - 3 - Actions and resources in relation to climate change policies</i>	64, 74
• Mid and long-term emissions targets	■	E1 - 4 - Targets related to climate change mitigation and adaptation ESRS 2 MDR-T - Tracking effectiveness of policies and actions through targets	<i>E1 - 4 - Targets related to climate change mitigation and adaptation</i>	77
Biodiversity				
• Biodiversity protection	✕	GRI 3-3 Management of material topics	<i>Biodiversity protection</i>	176
Workforce related information				
Employment				

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Number of employees by region, gender, age, type of contract and professional category	■	ESRS 2 SBM-1- Strategy, business model and value chain S1-6 - Characteristics of Amadeus' employees GRI 2-7 Employees GRI 405-1 Diversity of governance bodies and employees	ESRS 2 SBM-1- Strategy, business model and value chain, section Headcount of employees by geographical area, S1-6 - Characteristics of the undertaking's employees, 2. Own workforce information, section Employment, tables Number of employees by gender, age, and professional category as of 31st December (headcount), Number of employees by employment type and contract as of 31st December (Headcount)	25, 98, 177
• Annual average of openended contracts, temporary contracts and part-time contracts by gender, age and professional category.	■	S1-6 - Characteristics of Amadeus' employees GRI 2-7 Employees GRI 405-1 Diversity of governance bodies and employees	S1-6 - Characteristics of the undertaking's employees, 2. Own workforce information, section Employment, tables Annual average of contracts by employment type and gender (headcount), Annual average of contracts by employment type and age (headcount), Annual average of contracts by employment type and professional category (headcount)	98, 178, 179
• Dismissals by age, gender and professional category	■	S1-6 - Characteristics of Amadeus' employees GRI 401-1 New employee hires and employee turnover	S1-6 - Characteristics of the undertaking's employees, 2. Own workforce information, section Employment, table Dismissals by age, gender and professional category as of 31st December (Headcount)	99, 179
• Average remuneration evolution by gender, age and professional category	■	GRI 405-2 Ratio of basic salary and remuneration of women to men	Remuneration, table Average remuneration by gender, age and professional category, Average remuneration of the directors and executives	180, 181
• Average remuneration of board members and executive team	■	GRI 2-19 Remuneration policies GRI 405-2 Ratio of basic salary and remuneration of women to men	Remuneration, table Average remuneration of the directors and executives	181
• Pay gap	■	S1-16 Remuneration metrics (pay gap and total compensation) GRI 405-2 Ratio of basic salary and remuneration of women to men	S1-16: Remuneration metrics (pay gap and total remuneration), section Pay gap, Remuneration, section Weighted pay gap (average compensation), Weighted gender pay gap (median compensation)	117, 181, 182
• Work Disconnect policy	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce	S1-1 Policies related to own workforce - Working time, work-life balance and health and safety	101
• Employees with disabilities	■	S1-12- Persons with disabilities	S1-12- Persons with disabilities, Employees with disabilities	116, 182
Working-time management				
• Working-time management	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce	S1-1 Policies related to own workforce - Working time, work-life balance and health and safety	101
• Hours of absenteeism	■	GRI 3-3 Management of material topics	Absenteeism	182

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Work-life balance measures	■	ESRS 2 MDR-A - Actions and resources in relation to sustainability matters S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1-4 - Taking action on material impacts on own workforce - Working time, work-life balance and health and safety	105
Health and safety				
• Health and safety working conditions	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce ESRS 2 MDR-A - Actions and resources in relation to sustainability matters S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1-1 Policies related to own workforce - Working time, work-life balance and health and safety, S1-4 - Taking action on material impacts on own workforce - Working time, work-life balance and health and safety	101, 105
• Number of work accidents, Injury rate by gender and Lost day rate, by gender	■	S1-14 - Health and safety metrics GRI 403-9 Work-related injuries	S1-14 - Health and safety metrics, Health and safety, table Work-related injuries and rates per type and gender	109, 183
• Occupational disease rates by gender	■	S1-14 - Health and safety metrics GRI 403-10 Work-related ill health	S1-14 - Health and safety metrics, Health and safety, table Work-related injuries and rates per type and gender	109, 183
Social dialogue - Relationship with employees				
• Organization of social dialogue	■	S1-2 Processes for engaging with own workforce and workers' representatives about impacts	S1-2 Processes for engaging with own workforce and workers' representatives about impacts	91
• Percentage of employees covered by collective agreements	■	S1-8 - Collective bargaining coverage and social dialogue	S1-8 - Collective bargaining coverage and social dialogue, Social dialogue - Relationship with employees	100, 184
• Results of collective agreements on health and safety	■	S1-2 Processes for engaging with own workforce and workers' representatives about impacts S1-14 - Health and safety metrics	S1-2 Processes for engaging with own workforce and workers' representatives about impacts, S1-14 - Health and safety metrics, Health and safety, table Work-related injuries and rates per type and gender	91, 109, 183

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Mechanisms and procedures to promote employee involvement in company management	■	S1-2 Processes for engaging with own workforce and workers' representatives about impacts	<i>S1-2 Processes for engaging with own workforce and workers' representatives about impacts</i>	91
Training and development				
• Policies implemented in the field of training	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce	<i>S1-1 Policies related to own workforce - Training and skills development, including talent attraction and retention</i>	119
• Total amount of training hours by professional	■	S1-13 - Training and skills development metrics, including talent attraction and retention	<i>S1-13 - Training and skills development metrics, Training, table Total number of hours of training by professional category and gender</i>	123, 184
Accessibility for people with disabilities				
• Universal accessibility for people with disabilities	✕	GRI 3-3 Management of material topics	<i>Accessibility</i>	185
Equity				
• Measures taken to promote equal treatment and opportunities between women and men.	■	ESRS 2 MDR-A - Actions and resources in relation to sustainability matters S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	<i>S1-4 - Taking action on material IROs on own workforce - Diversity, gender equality and equal pay for work of equal value</i>	113
• Equality plans (Chapter III of Organic Act 3/2007, of 22 March, for the effective equality of women and men).	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce	<i>S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value</i>	110
• Measures taken to promote employment.	■	ESRS 2 MDR-A - Actions and resources in relation to sustainability matters S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	<i>S1-4 - Taking action on material IROs own workforce - Secure employment, collective bargaining and adequate wages</i>	95

Content	Materiality ■ Yes / ✕ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 Policies related to own workforce	<i>S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value</i>	110
• The policy against all types of discrimination and, where applicable, management of diversity.	■	S1-1 Policies related to own workforce	<i>S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value</i>	110
Human rights related information				
• Implementation of human rights related diligence procedures	■	ESRS 2 GOV-4 – Statement on due diligence	<i>GOV-4 – Statement on due diligence</i>	13
• Complaints related to Human Rights violations	■	S1-17 - Incidents, complaints and severe human rights impacts	<i>S1-17 - Incidents, complaints and severe human rights impacts</i>	101
• Compliance with and promotion of agreements in accordance with the ILO related to respect for freedom of association and the right to collective bargaining, elimination of employment discrimination, elimination of forced labor and effective abolition of child labor.	■	ESRS 2 MDR-P Policies adopted to manage sustainability matters S1-1 p. 19-20 - Policies related to own workforce ESRS 2 GOV-4 – Statement on due diligence	<i>GOV-4 – Statement on due diligence, S1-1 - Policies related to own workforce - Secure employment, collective bargaining and adequate wages, S1-1 Policies related to own workforce - Diversity, gender equality and equal pay for work of equal value</i>	13, 92,110
• Prevention, management and complaints about cases of violation of human rights	■	ESRS 2 GOV-4 – Statement on due diligence S1-17 - Incidents, complaints and severe human rights impacts	<i>GOV-4 – Statement on due diligence, S1-17 - Incidents, complaints and severe human rights impacts</i>	13, 101
Fight against corruption and bribery				
• Measures adopted to prevent corruption and bribery	■	G1-3 - Prevention and detection of corruption and bribery	<i>G1-1 - Business conduct policies and corporate culture, G1-3 - Prevention and detection of corruption and bribery</i>	128 ,140
• Measures to fight against money laundering	■	G1-1 - Business conduct policies and corporate culture G1-3 - Prevention and detection of corruption and bribery	<i>G1-1 - Business conduct policies and corporate culture, G1-3 - Prevention and detection of corruption and bribery</i>	128 ,140
• Contributions to charities and non-governmental organizations	✕	GRI 3-3 Management of material topics	<i>Societal information, table Contributions to non-profits organizations</i>	187
Social commitment				
• Impact over local development and employment	✕	GRI 3-3 Management of material topics	<i>Societal information</i>	186

Content	Materiality ■ Yes / ✗ No	Reporting framework (ESRS/GRI)	Location (section)	Page
• Impact over local populations and on the territory	✗	GRI 3-3 Management of material topics	<i>Societal information</i>	186
• Relationships with local stakeholders	✗	ESRS 2 SBM-2- Interests and views of stakeholders	<i>ESRS 2 SBM-2- Interests and views of stakeholders</i>	30
• Association and sponsorship actions	✗	G1-5 - Political influence and lobbying activities	<i>G1-5 - Political influence and lobbying activities</i>	143
Relationship with vendors				
• Inclusion of social, environmental and gender considerations in purchasing policy	■	G1-2 - Management of relationships with suppliers	<i>G1-2 - Management of relationships with suppliers</i>	136
• Social and environmental responsibility of vendors	■	G1-2 - Management of relationships with suppliers	<i>G1-2 - Management of relationships with suppliers</i>	136
• Supplier evaluation procedures: Monitoring systems and audits and results	■	G1-2 - Management of relationships with suppliers	<i>G1-2 - Management of relationships with suppliers</i>	136
Customer services				
• Measures for customer health and safety	✗	GRI 3-3 Management of material topics	<i>Customer services</i>	188
• Customer complaints management and number of complaints received and resolution	✗	GRI 3-3 Management of material topics	<i>Customer services</i>	188
Fiscal information				
• Pre-Tax Results and tax cash paid per country	■	ESRS 2 MDR-M – Metrics in relation to material sustainability matters	<i>MDR -M - Metrics in relation to material sustainability matters - Fair and transparency tax practices</i>	154
• Public subsidies received	■	ESRS 2 MDR-M – Metrics in relation to material sustainability matters	<i>MDR -M - Metrics in relation to material sustainability matters - Fair and transparency tax practices</i>	154
EU Taxonomy as per EU Regulation 2020/852				
• Amadeus' activities	NA	EU Regulation 2020/852	<i>Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation), section Assessment of compliance with Regulation (EU) 2020/852</i>	48
• KPIs and accounting policies	NA	EU Regulation 2020/852	<i>Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation), KPIs and accounting policy, tables Annex 2. Templates for KPIs- Taxonomy eligible activities, Table I – Proportion of turnover from products or services associated with Taxonomy-eligible and Taxonomy-aligned economic activities, Table II – Proportion of CapEx from products or services associated with Taxonomy-eligible and Taxonomy-aligned economic activities, Table III – Proportion of OpEx from products or services associated with Taxonomy-eligible and Taxonomy-aligned economic activities</i>	54, 61, 62, 63

AMADEUS IT GROUP, S.A. AND SUBSIDIARIES

Independent Limited Assurance Report of the Non-Financial Information Statement
and sustainability information for the year ended December 31, 2024

**Independent Limited Assurance Report on the Consolidated
Non-Financial Information Statement and Sustainability
Information for the year ended
December 31, 2024**

AMADEUS IT GROUP, S.A. AND SUBSIDIARIES

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT AND SUSTAINABILITY INFORMATION

Translation of a report and annual accounts originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails

To the shareholders of AMADEUS IT GROUP, S.A.:

Conclusion of limited assurance

In accordance with article 49 of the Commercial Code, we have conducted a limited assurance engagement on the Consolidated Non-Financial Information Statement ("NFIS") and Sustainability Information for the year ended December 31, 2024 of AMADEUS IT GROUP, S.A. (the "Entity") and subsidiaries (the "Group"), which is part of the Group's consolidated management report.

The content of the NFIS contains information in addition to that required by prevailing company law in respect of non-financial information, specifically the Sustainability Information prepared by the Group for the year ended December 31, 2024 (the "Sustainability Information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council, as regards corporate sustainability reporting (the "CSRD"). The Sustainability Information was also subject to limited assurance.

Based on the procedures applied and the evidence obtained, no matter has come to our attention that would cause us to believe that:

- a) The Group's NFIS for the year ended December 31, 2024 has not been prepared, in all material respects, in accordance with the contents required by prevailing company law and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described, as explained for each matter in table "Table of contents as required by Law 11/2018" of the NFIS.
- b) The Sustainability Information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying section "Basis for preparation", including:
 - That the description of the process for identifying the Sustainability Information to be disclosed included in section "Impacts, risks and opportunities management" is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
 - Compliance with ESRS.
 - Compliance with the disclosure requirements included in subsection "Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation)" on the environmental section of the Sustainability Information, as established in Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020, on the establishment of a framework to facilitate sustainable investments.

Basis of conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 issued by the Spanish Institute of Chartered Auditors on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures in a limited assurance engagement are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* of our report.

We have complied with the independence and other ethics requirements laid down in the International Code of Ethics for Professional Accountants (including international standards on independence) of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies the International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement, and monitor a system of quality management that includes policies and procedures covering compliance with its ethics requirements, professional rules and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' responsibilities

The preparation of the NFIS in the Group's consolidated management report is the responsibility of the directors of AMADEUS IT GROUP, S.A. The NFIS has been prepared in accordance with the content required by prevailing company law and in conformity with the selected ESRS criteria, as well as other criteria described for each matter in table "Table of contents as required by Law 11/2018" of the NFIS.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFIS is free of material misstatement, due to fraud or error.

The directors of AMADEUS IT GROUP are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFIS is obtained.

In relation to the sustainability disclosures, the entity's directors are responsible for developing and implementing a process for identifying the disclosures to be included in the Sustainability Information in accordance with the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the Sustainability Information in section "Impacts, risks and opportunities management". This responsibility includes:

- ▶ Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- ▶ Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- ▶ Assessing the materiality of the identified impacts, risks and opportunities.
- ▶ Making assumptions and estimates that are reasonable under the circumstances.

The directors are also responsible for the preparation of the Sustainability Information, which includes the information identified by the process, in accordance with the sustainability reporting framework used, including compliance with the CSRD, the ESRS, and the disclosure requirements, included in subsection "Disclosures pursuant to Article 8 of Regulation (EU) 2020/ 852 (Taxonomy Regulation)" of the section on the Environment in the Sustainability Information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- ▶ Designing, implementing and maintaining such internal control as the directors consider relevant to enable the preparation the Sustainability Information that is free from material misstatement, whether due to fraud or error.
- ▶ Selecting and applying appropriate methods for the presentation of Sustainability Information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

Inherent limitations in the preparation of the information

In accordance with ESRS, the entity's directors are required to prepare forward-looking information on the basis of assumptions and hypothetical assumptions, which must be included in the Sustainability Information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.

In determining the disclosures in the Sustainability Information, the entity's directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, which, accordingly, are subject to uncertainty.

Practitioner's responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and Sustainability Information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- ▶ Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and Sustainability Information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.
- ▶ Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- ▶ Design and perform procedures responsive to disclosures in the NFIS and Sustainability Information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary from the work performed

A limited assurance engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and Sustainability Information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and Sustainability Information, reviewing the processes used for compiling and validating the information presented in the NFIS and Sustainability Information, and applying certain analytical procedures and sample review tests as described below:

For assurance of the NFIS:

- ▶ Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
- ▶ Analyzing the scope, relevance and completeness of the content of the 2024 NFIS based on the materiality assessment performed by the Group and described in section "Impacts, risks and opportunities management" of the NFIS, considering the content required in prevailing company law.

- ▶ Analyzing the processes used to compile and validate the data presented in the 2024 NFIS.
- ▶ Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the 2024 NFIS.
- ▶ Checking, through sample testing, the information underlying the content of the 2024 NFIS and whether it has been adequately compiled based on data provided by information sources.

For assurance of the Sustainability Information:

- ▶ Making inquiries of Group personnel:
 - To understand the business model, the policies and management approaches applied and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
 - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- ▶ Obtaining, through inquiries of Group personnel, insight into the entity's processes for gathering, validation, and presenting relevant information for the preparation of its Sustainability Information.
- ▶ Assessing whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the Sustainability Information is consistent with the description of the process included in that information, as well as assessing whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of the ESRS.
- ▶ Assessing whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the Sustainability Information is effectively included.
- ▶ Evaluating whether the structure and presentation of the Sustainability Information is consistent with ESRS and the rest of the sustainability reporting framework applied by the Group.
- ▶ Performing inquiries of relevant personnel and analytical procedures on the disclosures in the Sustainability Information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Performing, as appropriate, substantive procedures through sampling of selected disclosures in the Sustainability Information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Obtaining, as appropriate, reports issued by accredited independent third parties accompanying the consolidated management report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.

- ▶ Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the Sustainability Information are met.
- ▶ Obtaining a representation letter from the directors and management regarding the NFIS and Sustainability Information.

Other information

The persons in charge of the entity's governance are responsible for other information. Other information comprises the consolidated financial statements and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the Sustainability Information and attached to the consolidated management report.

Our assurance report does not cover other information and we do not express any form of assurance conclusion on it.

Our responsibility in connection with our engagement to assure the Sustainability Information is to read the other information identified and consider whether it is materially inconsistent with the Sustainability Information or the knowledge we have obtained during the assurance engagement that could indicate material misstatements in the Sustainability Information.

ERNST & YOUNG, S.L.

(Signed in the original version in Spanish)

Luis San Pedro Alarcón

February 27, 2025