

# CORPORATE TAX POLICY

Amadeus Group

Approved by the Board of Directors on 24 February 2022

# TAX POLICY OF AMADEUS IT GROUP, S.A. AND ITS CORPORATE GROUP

## 1. INTRODUCTION

The mission of the Amadeus Group (the “Group”) is to be a leading provider of technology solutions for the travel and tourism industry.

The Group’s tax contribution to society, by means of compliance with its tax obligations regarding both taxes paid directly by the Group as well as taxes collected from third parties, but derived from the Group’s activity, forms part of its essential contribution to the sustainability of public finances and the development of the communities in which the Group operates.

The tax strategy or policy (the “Policy”) of the Amadeus Group, led by Amadeus IT Group, S.A. (“Amadeus,” “Amadeus Group” or the “Company”), is aimed at full and comprehensive compliance with the tax laws and regulations of each country and jurisdiction in which it operates. Amadeus also endeavors to meet the highest standards of the business community in which it operates, with the aim of being recognized for its best practices and programs in terms of corporate and tax governance.

The tax Policy also serves as an instrument to promote the Sustainable Development Goals and encourage the adoption of environmental, social and governance (ESG) criteria, as emphasized by the European Economic and Social Committee.

## 2. POLICY SCOPE

The Policy applies to all taxes managed in all countries in which the Amadeus Group operates, or has a presence, and to all companies belonging to the Amadeus Group.

The immediate recipients of the Policy are the members of the Board of Directors, the Management Committee and all employees of the Group companies who are involved, directly or indirectly, in carrying out the tax processes related to the tax function.

## 3. POLICY APPROVAL

This document was approved by the Group’s Board of Directors at its meeting held on 24 February 2022, and is an update to the previous policy, dated 10 December 2015.

This Policy will be proactively disseminated to guarantee that all managers and employees of the Amadeus Group are aware of and effectively comply with this Policy. Any local initiatives implemented in this regard by any Group company due to legal requirements shall, at a minimum, contain the principles laid out in this Policy. This Policy will also be disseminated publicly and published on the Company’s website under its general policies.

This Policy will be reviewed every three years, notwithstanding the submission for approval to the Board of Directors of a new document in the event of material changes prior to said review.

#### 4. PRINCIPLES OF THE GROUP'S TAX POLICY

Based on the foregoing, and taking into account the social interests of the Company, its shareholders and its primary stakeholders, as well as the general interests of the society to whose sustainability it contributes, Amadeus shall be governed by the following tax principles:

- Full compliance with applicable tax legislation in the jurisdictions where the Group operates. In this regard, the Group undertakes to pay all legally required taxes through an efficient management of tax costs, without incurring undue tax burdens.
- 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 ("OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations" and "Recommendations of the EU Joint Transfer Pricing Forum").
- Non-use of low or nil tax jurisdictions, especially tax havens, 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. In this regard, the incorporation of transactions with companies residing in low or nil tax jurisdictions, or in non-cooperating territories, will be limited to those cases in which it is imperative for the performance of the Group's ordinary business activities.
- Responsible, informed, efficient and transparent management of all matters relating to emerging domestic and international regulations in the digital economy in order to ensure that the tax scope affecting Amadeus is adapted to the new digital economy environment that shapes the current market.
- 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 (in terms of employment, R&D&i, etc.).

- 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. In the case of specific tax positions that are based on interpretative criteria that may differ from those of the tax authorities, the Company will document and justify the adopted position which, in any case, shall be based on a reasonable interpretation of the applicable regulations and jurisprudence.
- Cooperation and collaboration with the tax authorities in their audit, verification and control activities of Amadeus, or any of its Group companies, notwithstanding the legitimate right of the Company to disagree with the criteria of the tax authorities and to maintain its own position before the Courts as long as it is based on a reasonable interpretation of the regulations, and with the aim of defending the legitimate interests of the Group. In this regard, Amadeus will provide, as soon as possible and with the due scope, any information and documentation with tax significance that may be requested by the tax administrations within the exercise of their powers.
- 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. Additionally, as deemed necessary by the Group, highly recognized external tax advisers can be hired to guarantee compliance with tax obligations in accordance with this Policy.
- Maintain internal control systems for tax processes that guarantee adequate and systematic management of compliance with tax obligations, identifying and assessing tax risks and periodically reviewing the controls associated with these processes to ensure good tax governance.

Madrid, 24 February 2022