

SUSTAINABILITY REPORT

2021

TABLE OF CONTENTS

1. MESSAGE FROM THE HEAD OF BUSINESS DEVELOPMENT INTERCRUISES

2. ABOUT INTERCRUISES

3. INTERCRUISES SUSTAINABILITY STRATEGY - better holidays, better world

- A. Step Lightly
- B. Make a difference
- C. Lead the way
- D. Care more

4. INTERCRUISES SUSTAINABILITY BEST PRACTICES

- A. Human Rights
- B. Labor Standards
- C. Environment
- D. Anti-Corruption



1. HEAD OF BUSINESS DEVELOPMENT INTERCRUISES

On November 15th 2012, Intercruises Shoreside & Port Services, operating under TUI Holding Spain legal entity, became a member of the United Nations Global Compact (UNGC), and committed to integrating the principles of the UNCG within its business strategy and day-to-day operations.

We are pleased to confirm our continued support for the *UNCG* and renew our ongoing commitment to the initiative and its principles concerning human rights, labor, environment and anti-corruption, as well as the *Sustainable Development Goals* defined in the *2030 Agenda for Sustainable Development*. Coronavirus has had a significant impact on our business, and as we restart our operations it is vital to embed sustainability on the business and position it as a priority on the decision-making processes to

make travel more sustainable. Our mission and values will help us achieve our goals to help reconcile economic growth with environmental and social responsibility. With this document, our eighth annual *Communication on Progress*, Intercruises is making a clear statement of this commitment with stakeholders and the public using our primary channels of communication.

This year, despite the difficulties experimented, as part of our *Sustainability Strategy*, we have strengthened our commitments in order to have a more positive impact on the environments in which we operate. This includes the following:

- Development and Implementation of the KPIs and deliverables of the Group Sustainability Strategy – “Better Holidays, Better World” - within Intercruises.
- Design and implementation of an online sustainability assessment based on GSTC criteria for the entire supply chain of our Shorex.

As a proud member of the *UNGC*, we are thrilled to further our commitment to its principles and *Sustainable Development Goals*, and look forward to reviewing and evaluating our progress along the way.

Yours sincerely,



Olga Piqueras
Head of business
development Intercruises





2. ABOUT INTERCRUISES

Intercruises is an experienced global business offering turnaround, shore excursion, port operations and hotel services to the ocean and river cruise industry. Cruise specialist teams handle all vessel, guest and crew needs, before, during and after a ship's time in port.

Operating in over 400 ports worldwide, encompassing over 50 countries spread across the Americas, Asia-Pacific & Indian Ocean, Europe, Middle East & North Africa (EMENA).

All Intercruises teams worldwide are supported by a central team of Industry experts to support regional initiatives, ensure quality standards, enhance business efficiency, strengthen client relationships and facilitate business development.

Intercruises is an award-winning business, having received numerous accolades relating to service quality and innovation, including being the most successful business in the history of the *Seatrade Insider* Innovative Shorex Award as a four time Winner and four time Runner Up, Winner of the Seatrade Sustainable Pitch, Best Use of Technology and Best Excursion at Wave Awards, Special Recognition of Innovation and Commitment to the environment at Premios Excellence de Cruceros, Winner for Most Efficient Shorex Agent & Tour Operator at MedCruise Awards, winner of a Cruise Insight Award in the area of Shore Excursion Enhancement and Operating Procedures for its Shorex Categories initiative and lately the winner of a MedCruise award for its greatest commitment during the pandemic.

Intercruises is an Active Participant of the United Nations Global Compact (UNGC) – a principle based framework dedicated to the implementation of better business practices, primarily in the areas of human rights, labor, the environment and anti-corruption being part of two working groups: Spanish Tourism and Sustainable Ocean Guidance for Cruises. Intercruises has signed the Global Code of Ethics for Tourism – a set of principles implemented by the World Tourism Organization, considered to be a point of reference for key players in the tourism industry.

Intercruises is part of TUI Group, the world's largest travel group. Within TUI Group, Intercruises belongs to TUI Musement (TUI MM).

About TUI Musement

TUI Musement is a leading Tours & Activities business that combines a scalable digital platform with local service delivery in more than 100 countries worldwide. Available in all major holiday and city destinations to travellers around the world, including the 28 million annual TUI customers, there are currently more than 215,000 experiences, including excursions, activities, tickets and transfers. These are distributed through the Musement and TUI websites and apps, and B2B partners, including the world's leading OTAs, tour operators, travel companies and cruise lines, who work with our different B2B brands, including Intercruises Shoreside & Port Services. TUI Musement is one of the major growth areas of TUI Group.

About TUI Group

TUI Group is a leading global tourism group and operates worldwide. The Group is headquartered in Germany. TUI shares are listed on the FTSE 250, an index of the London Stock Exchange, on the regulated market of the Hanover Stock Exchange and on the Open Market segment of the Frankfurt Stock Exchange. The TUI Group offers integrated services from a single source for its 28 million customers, 21 million of them in the European national companies.

The entire tourism value chain is covered under one roof. This includes over 400 hotels and resorts with premium brands such as RIU, TUI Blue and Robinson and 16 cruise ships, from the MS Europa and the MS Europa 2 in the luxury class and expedition ships to the Mein Schiff fleet of TUI Cruises and cruise ships at Marella Cruises in Great Britain. The Group also includes leading tour operator brands and online marketing platforms across Europe, five airlines with more than 100 modern medium and long-haul aircraft and over 1,000 travel agencies.

In addition to expanding its core business with hotels, cruises via successful joint ventures and activities in holiday destinations, TUI is increasingly focusing on the expansion of digital platforms. The Group is transforming itself into a digital company.

Global responsibility for sustainable economic, ecological and social action is at the core of our corporate culture. The TUI Care Foundation, initiated by TUI, focuses on the positive effects of tourism, on education and training and on strengthening environmental and social standards with projects in 25 countries. It thus supports holiday destinations in their development.

PART OF THE CRUISE INDUSTRY



Diamond Executive Partner since 2013 and Official Logistics Partner at various events since 2014



Associate Member for over 10 years and Official Shorex Supplier at various events



Exhibitor, Advertiser, Sponsor and Official Logistics Partner on various occasions since 2004



(Formerly Cruise Down Under) Member since 2011



Associate Member since 2014



Service Member for over 10 years and part of the Official Steering Committee



Headline Sponsor since 2011



China Cruise and Yacht Industry Association - Executive Council Member since 2017

PRODUCT/SERVICES



TURNAROUNDS



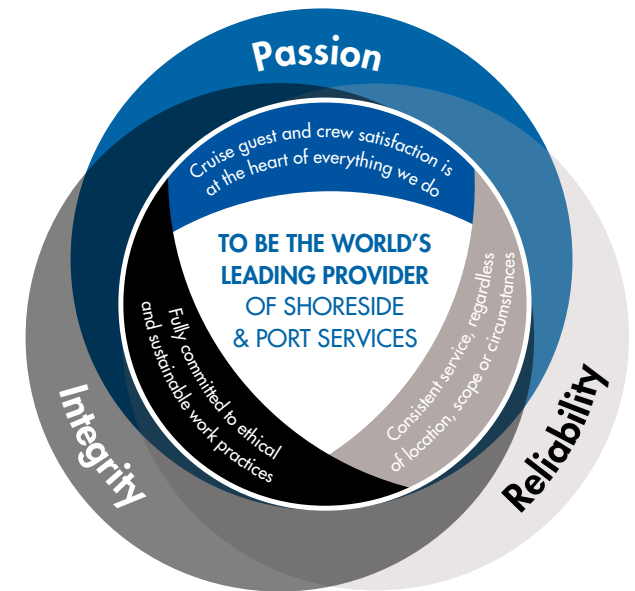
SHORE EXCURSIONS



PORT OPERATIONS



HOTEL PROGRAMS



KEY STATS

+50
COUNTRIES

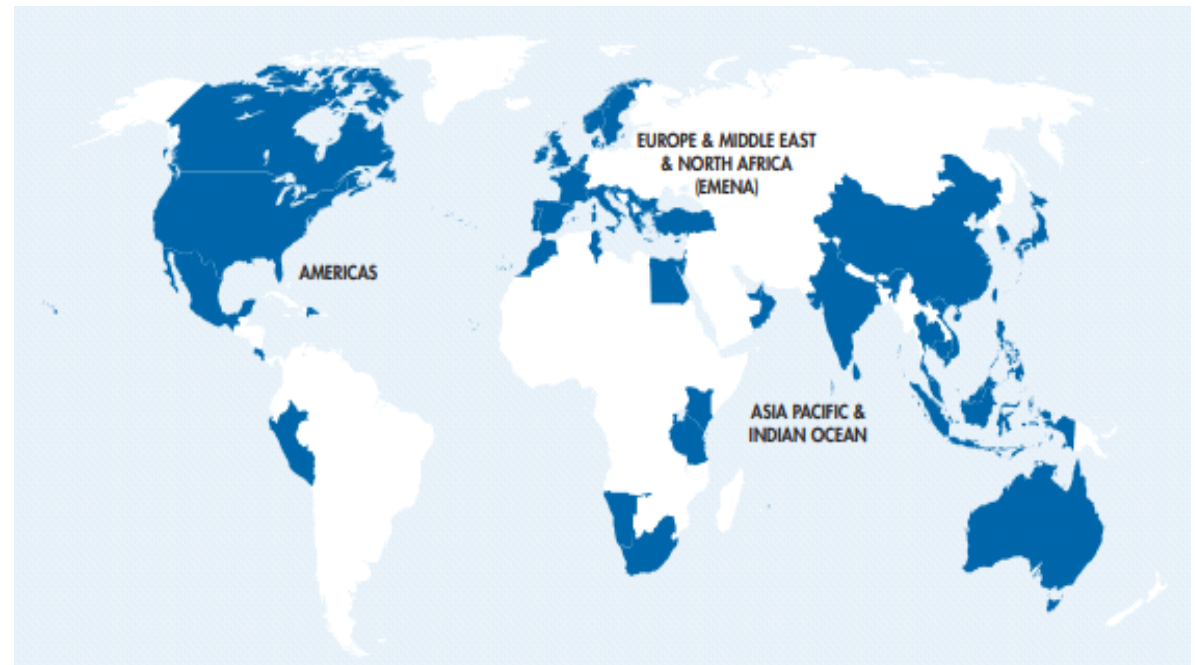
+17,000
SHORE EXCURSIONS

+400
PORTS

+13,000*
ANNUAL PORT CALLS
*based on FY2019 data

+44m €
SALES (last Fiscal Year)

REGIONS



For the last ten years, Intercruises has pursued a more sustainable and responsible way of doing business with its suppliers and the travel and tourism destinations in which we operate.

2011



- IC Sustainability Department
- Save the Children partnership
- 1st Carbon Management reporting

2012



- United Nations Global Compact partnership
- ISO 9001+14001 Certification for Operations and Barcelona Head Office

2013



- Cruise Gateway Conference 2013, sustainable shore excursions
- Green Commitment Ecolabel (BCN)

2014



- Global Compact 1st report
- BCN Waste Management
- "Don't Look Away" Child Protection Campaign

2015



- ISO 9001+14001 certification (including PMI)
- Interquiz Project
- STEP Project

2016



- Travelife Partner Certification for 12 offices

2017



- New Sustainability Objectives and KPIs
- Carbon Neutral Project

2018



- Global Code of Ethics for Tourism
- Travelife Partner certification for 4 offices

2019



- Mercy Ships partnership
- Great Barrier Reef partnership
- Winner of a pitch competition - Sustainable Tour Criteria concept - Seatrade Cruise Global

2020



- Control Union certifies our Sustainable Management System as GSTC compliant
- Sustainable Shorex online questionnaires development

2021



- Sustainability questionnaires for Shorex Suppliers



3. INTERCRUISES SUSTAINABILITY STRATEGY

BETTER HOLIDAYS, BETTER WORLD

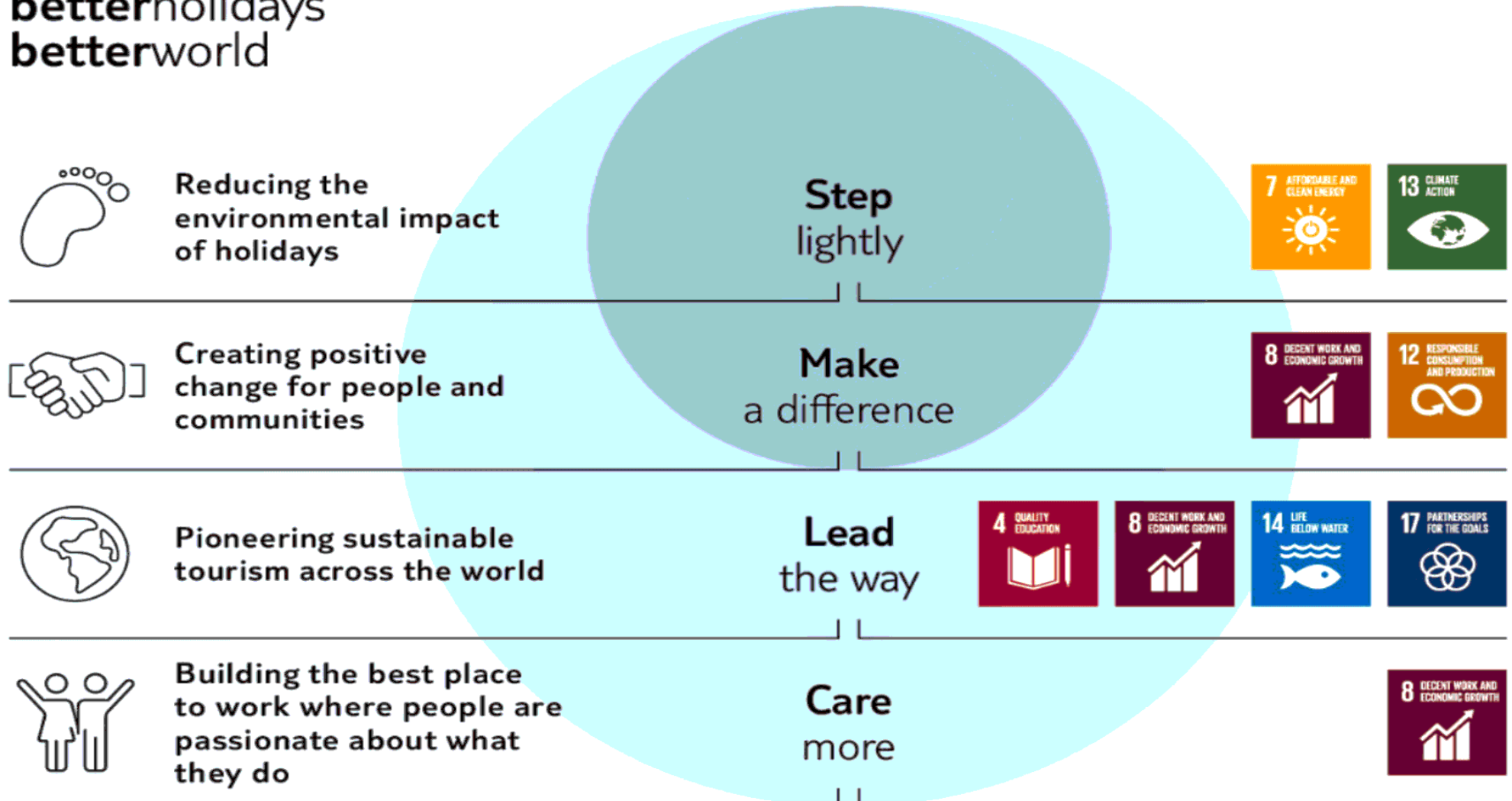
Intercruises integrates sustainability into its business strategy and tries to continuously minimize its impact to ensure prosperity for all. Intercruises uses its network of stakeholders to minimize the negative impact of tourism in the communities in which it operates.

The eighth Intercruises Sustainability Report operating under TUI Holding Spain legal entity, has also been affected by Covid-19, but after two years of pandemic there is a very positive development in the operating result of the cruise segment and losses were significantly reduced. Intercruises has been using this downtime to develop the sustainability strategy 'Better Holidays, Better World' to strengthen and expand its leading role.

SUSTAINABILITY STRATEGY

Our Sustainability Strategy is built around four core pillars, these are areas where we aim to make a positive impact to create change at scale – in our own operations, through our value chain and customers, and across the wider industry and beyond.

betterholidays
betterworld



A. STEP LIGHTLY

Reducing the environmental impact of holidays. A healthy planet and a healthy travel and tourism industry go hand-in-hand. That's why conserving natural resources and mitigating negative environmental impacts are vital to our business. We are committed to continuously reducing the environmental impact of our holidays.

UN GLOBAL COMPACT PRINCIPLES	7 8 9	SUSTAINABLE DEVELOPMENT GOALS	7 AFFORDABLE AND CLEAN ENERGY	13 CLIMATE ACTION
------------------------------------	-------	-------------------------------------	----------------------------------	----------------------

GOALS	ACHIEVEMENTS	NEXT STEPS
Reduce carbon emissions in our offices	<ul style="list-style-type: none"> Annual Carbon Footprint Report for Major Premises and Ground Transport Onboarding training with environment Best Practices Smiling Office Guidelines Circular Economy trainings 	<p>TUI Academy</p> <p>Science based targets approach</p>

MEASUREMENT

In 2019, carbon emissions from our major offices totalled 16,213 tonnes of CO₂; 1,600 retail shops generated 8,329 tonnes of CO₂ and 4,679 tonnes of CO₂ resulted from brochure production. This in total is 29,221 tonnes of CO₂ and reflects a 22.5% reduction against the 2015 baseline (37,687 tonnes of CO₂). (*)Due to the COVID-19 crisis, the key figures of the financial year 2020 unfortunately are of limited use for comparison.

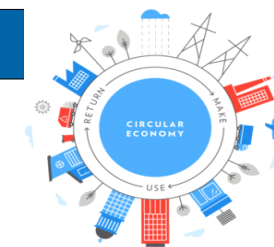
Carbon Dioxide emissions (CO₂) and Energy usage (MWh) in our Major Premises and Ground Transport

tons	2020	2019	Var. %
Major Premises	18,189	24,542	-25,9
Ground Transport	5,235	18,277	-71,4

MWh	2020	2019	Var. %
Major Premises	64,931	85,689	-24.2
Ground Transport	20,986	73,277	-71.4

HIGHLIGHTED ACTIVITIES

In order to raise awareness in Circular Economy and foster the transformation to a sustainable business, we have recently started holding e-learning sessions with relevant teams and persons, e.g. procurement teams across Group.



B. MAKE A DIFFERENCE

Creating positive change for people and communities. Local communities should share the benefits of tourism and the environment and human rights should be protected. Our 'Make a difference' pillar aimed to ensure that tourism is a powerful force for good – boosting economies, creating jobs, protecting wildlife and enhancing cultural understanding and tolerance along our value chain. By showing customers how more sustainable holiday products equal a better holiday experience, we wanted to boost demand for sustainable tourism.



GOALS	ACHIEVEMENTS	NEXT STEPS
New Policies / Manuals / Guidelines / Procedures	<ul style="list-style-type: none"> Sustainability Policy updated Groups Policies: Integrity Passport, Animal Welfare and Child Protection Development of the Sustainable Management System Sustainability in operations Covid-19 Sustainability Questionnaires for suppliers and offer development teams 	Sustainability Guidelines for Experiences' Suppliers
Sustainable Management System – GSTC compliant	<ul style="list-style-type: none"> Intercruises Sustainability Standard: a set of criteria compliant with the GSTC applicable to Destination Management Companies. Certified by Control Union in January 2020. Implementation of the Standard into Intercruises operations Certified by Control Union in November 2020. 	Multisite certification for excursions & activities
Favour suppliers and contractors who promote sustainable development	<ul style="list-style-type: none"> Animal Welfare requirements Animal Welfare auditing program Sustainable Purchasing Guidelines Sustainability clause included in all contracts Specific sustainability assessments for certain suppliers 	Sustainability questionnaire with a scoring system based on GSTC requirements for Experiences' Suppliers
Facilitate training for suppliers	<ul style="list-style-type: none"> Sustainability training for Tour Guides 	TUI Partners website

MEASUREMENT

6698 suppliers have been risk assessed (875 from last fiscal year). The risk assessment includes

Sustainability, Health & Safety and Legal topics. Since 2016:

- 237 audits conducted
- 153 online self-assessments answered
- 58% influenced suppliers to improve on AW
- 10% suppliers with stopped sales
- 82% of animal related activities audited

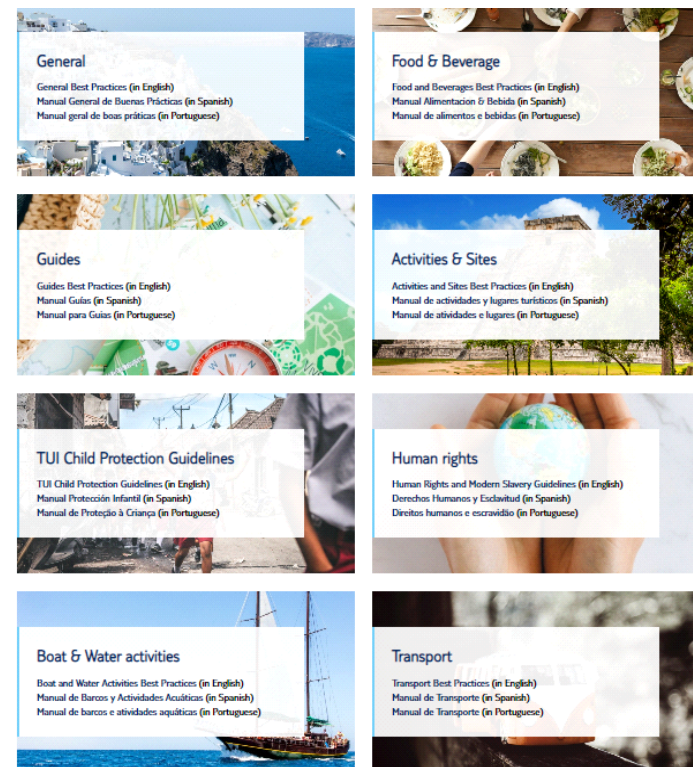
*due to the covid situation onsite audits have been postponed.

We have created eight new Sustainability best practices Guidelines for our Excursions' Suppliers:

The following guidelines are relevant to all type of partners:

- General Best Practices
- Child Protection Guidelines
- Human Rights and Modern Slavery

All other guidelines are specific for the type of partner.



HIGHLIGHTED ACTIVITIES

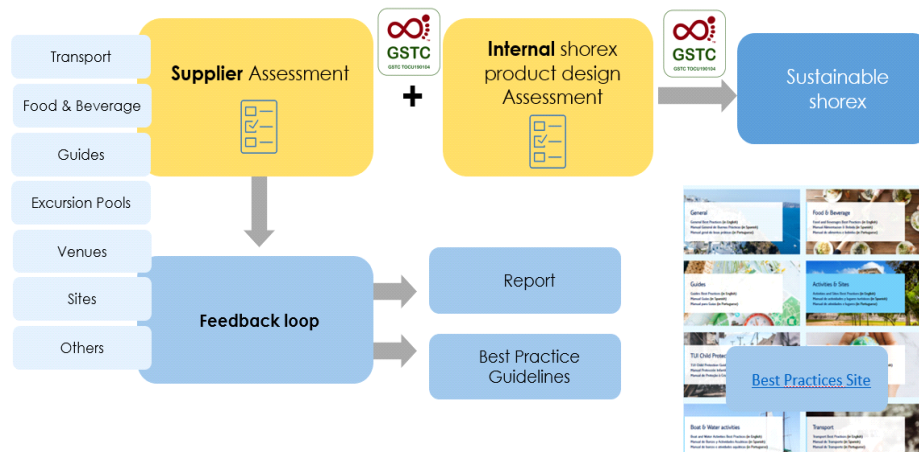
Sustainability requirements for Suppliers

Through cooperation and cocreation with our partners throughout the value chain, we believe that we can create more sustainable experiences, beneficial for all.

We want to be sure that our processes are compliant with the GSTC requirements and to do so we have designed a three steps certification plan.

For the certification process, Intercruises is working with Control Union, a GSTC accredited third party certification body, to ensure the quality and neutrality of process.

- Standard developed by Intercruises: Given there was no GSTC criteria available for our type of business, we decided to create a new set of criteria, based on GSTC, valid for Destination Management Companies. These criteria was certified by Control Union in January 2020
- Intercruises compliant with new standard: As a next step, Control Union certified that these criteria were also correctly applied by Intercruises to their processes and operations. This was certified by Control Union in November 2020.
- Intercruises multi-site certification for Shorex: An audit plan has been designed to determine whether the criteria are being met at destination level worldwide, and within our excursion supply chain. This will allow us to classify our Shorex as "GSTC Certified". Expected for April 2022.



Our scalable digital solution has the following benefits for our suppliers:

- Access to a fully digitalized process
- Every Supplier with own credentials to Access the platform
- All responses remain registered in the platform
- Suppliers could access at all times the questionnaires and edit the responses.
- Suppliers receives a document with the results and their points and a Diploma
- Highlighted strengths, possible improvement areas, etc.



C. LEAD THE WAY

Pioneering tourism across the world. Intercoises has a valuable opportunity and unique responsibility within our industry to encourage uptake of sustainable tourism. Our scale gives us the resources, reach and credibility to strengthen the positive impacts travel and tourism can have.

UN GLOBAL COMPACT PRINCIPLES	1 2 7 8 9	SUSTAINABLE DEVELOPMENT GOALS	4 QUALITY EDUCATION	8 DECENT WORK AND ECONOMIC GROWTH	14 LIFE BELOW WATER	17 PARTNERSHIPS FOR THE GOALS
------------------------------------	-----------	-------------------------------------	------------------------	--------------------------------------	------------------------	----------------------------------

GOALS	ACHIEVEMENTS	NEXT STEPS
Destinations monetary or In kind donations	<ul style="list-style-type: none"> Worldwide volunteering activities (workshops) Christmas campaigns Clean-up campaigns 	Promote benefit to local communities
Invest € 10 million per year to support TUI Care Foundation initiatives	<ul style="list-style-type: none"> We have raised €39 million to support good causes and enhance the positive impacts of tourism, reaching a peak of €8.1 million in one year in 2019. 	Promote benefit to local communities through operations

MEASUREMENT	<p>Since the start of the strategy:</p> <ul style="list-style-type: none"> €39 million to support good causes and enhance the positive impacts of tourism Improve the life chances of over 100,000 children and young people. Over 1.6 million animals have been protected Aims to help enhance 10,000 local livelihoods in destinations
-------------	--

HIGHLIGHTED ACTIVITIES

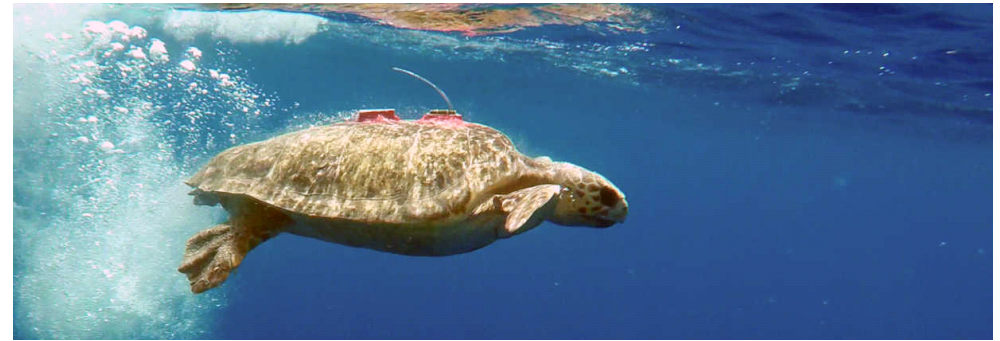
TUI Care Foundation is the independent charitable foundation through which TUI Group invests in sustainability programs in destinations. It was launched to contribute to the Sustainable Development of holiday destinations, offering holidaymakers the opportunity to directly support people, animals and nature at their holiday destination. The organisation “works global and acts local” through strong partnerships with local and international organisations and by making it easy for holidaymakers to make a difference.

TUI Care Foundation builds on the potential of tourism as a force for good by supporting and initiating partnerships and projects that create new opportunities for the young generation and contribute to thriving destinations all over the world. In order to make the TUI Care Foundation financially sustainable, they use 9% of the funds donated by TUI businesses (such as the donations from TUI Collection or Tours) to pay administrative fees and overheads, which allows them to still use 100% of the direct customer donations + 91% of TUI businesses donations to support TUI Care Foundation projects in destinations. The TUI Care Foundation focuses its strategy around three fields of engagement:

- Empowering young people: The TUI Care Foundation aims to improve the life chances of over 100,000 children and young people. Project examples: protecting young people from exploitation by building their life skills and providing vocational training in tourism (Dominican Republic); opening up new perspectives for young people through the establishment of a social enterprise training restaurant (Vietnam); providing hospitality training to underprivileged young people (Sri Lanka); and supporting vocational training for disadvantaged youth (Greece).



- Protecting the natural environment: Over 1.6 million animals have been protected through projects supported by the TUI Care Foundation, exceeding the ambition of 1 million. Project examples: protecting marine turtles and helping to build turtle friendly environments in holiday destinations (Worldwide); protecting elephants in the wild (Kenya) and improving the welfare of elephants kept in captivity for tourism entertainment (Thailand); and working with the tourism industry to reduce single-use plastics (Cyprus).



- Thriving communities: The TUI Care Foundation aims to help enhance 10,000 local livelihoods in destinations through tourism. Project examples: supporting women to develop food-related businesses for tourists in the traditional areas of Malaga (Spain); connecting local farmers with holiday destination supply chains in Andalucía (Spain); creating a brighter future for young people through a cycling enterprise (Morocco); support for young entrepreneurs to set up and part-own marketplaces in tourist locations (South Africa); and a tourism startup accelerator (Egypt).



D. CARE MORE

Pioneering tourism across the world. InterCruises has a valuable opportunity and unique responsibility within our industry to encourage uptake of sustainable tourism. Our scale gives us the resources, reach and credibility to strengthen the positive impacts travel and tourism can have.

UN GLOBAL COMPACT PRINCIPLES	3 4 5 6	SUSTAINABLE DEVELOPMENT GOALS	8 DECENT WORK AND ECONOMIC GROWTH
------------------------------------	---------	-------------------------------------	--------------------------------------

GOALS	ACHIEVEMENTS	NEXT STEPS
Promote diversity, inclusion and equal opportunities	<ul style="list-style-type: none"> A Diversity Action Group, which includes representatives of the markets and segments, was set up to implement these projects. Two global employee networks were formed, complementing existing employee networks in the markets. In addition, many other learning materials and virtual events were launched to promote diversity among employees and managers. 	Diversity Roadmap 2030.
Sustainability upskilling and reskilling	<ul style="list-style-type: none"> Compliance modules information Coronavirus prevention module Learning Week, "Quo Vadis Tourism - Global discussion on the impacts of tourism and its challenges for the business" Wheelchair Training and Person with reduced mobility training in accordance with the (EU) 1177/2010 regulation Human rights and Child Protection training Smiles Academy 	TUI Academy

MEASUREMENT	<ul style="list-style-type: none"> Employees from over 120 countries in 180 destinations. 55.2% proportion of women among employees and 35.7% in management. More than half of the employees are not older than 40 years. The group of employees over 50 remained constant at 15.8%. TUI Museum employees completed a bi-annual mandatory training programme on child protection and modern slavery, 5,577 training were conducted in 2020 and additional 2,461 in 2021.
-------------	---

HIGHLIGHTED ACTIVITIES

In line the group activities related to Diversity, Equity and Inclusion TUI Musement has created YouMatter team, a team of nearly 40 colleagues dedicated to looking at Diversity, Equity and Inclusion in TUI MM.

Within the team, colleagues have been split into six groups who will deep dive into the following topics:

- Diverse leadership
- Colleague experience
- All communities
- Inclusion
- (Dis)abilities
- Generation exchange



During the last fiscal year we have celebrated different events to find out more about these diversity topics:

- TUI MM's Diversity and Inclusion week
- Black History Month
- TUI MM International Women's Day

The We Care Wellbeing hub is a solution for all colleagues in TUI Musement to use. The Hub has been designed and created by the We-Care ambassadors to support all colleagues' mental health, wellness, physical and social wellbeing and help people to be their best and most productive self. What's more the hub provides access to confidential health lines and employee assistance programmes.

We also have celebrated different events to support this cause:

- Tea and Talk
- Colleague stories
- Mental health talk
- Desk chair yoga
- Mindfulness at work





4. INTERCRUISES SUSTAINABILITY BEST PRACTICES

A. HUMAN RIGHTS

- Principle 1: Business should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in the abuse of human rights.

Intercruises' commitment to treat people in a way that respects their **human rights** by operating responsibly and sustainably worldwide.

Intercruises is committed providing **human, in-kind and/or financial support to the local communities** where we are present, optimizing our social and economic impacts with the support of our human team and our network of partners. The aim is to generate prosperity and sustainable development in the communities where we are present.

We establish some partnerships and collaborations with different NGOs to help more people especially in undeveloped areas.

Intercruises is committed to sustainable, ethical business in compliance with applicable laws, conventions and regulations and became a signatory of the UNWTO Global Code of Ethics for Tourism.

Intercruises seeks to support efforts to protect human rights and strives to develop appropriate, environmentally and socially sustainable chains of responsibility and response mechanisms within our sphere of influence.

Our **Integrity Passport** gives us guidance on how to deal with the most important legal and integrity matters in our daily work and also how to report potential violation of our Integrity Passport or other compliance matters using the **SpeakUp Line**. In 2020, 50 reports were received via the 'Speak Up' system and investigated. Human Rights working group meets regularly to assess risks, assign tasks and monitor progress of measures according to the UK Modern Slavery Act legislation.

Likewise, **suppliers** shall comply with the **Suppliers Code of Conduct**. This Code serves as guidelines to a standard of ethical conduct, values and principles expected from the suppliers

when working on our behalf. Suppliers are expected to uphold our principles by: adopting accessible and clear policies and procedures to respect human rights and labor law; supporting local communities; identifying and monitoring bribery and corruption risks; identifying and monitoring negative environmental impacts; and introducing/maintaining Quality Assurance and Health and Safety policies and procedures in their businesses where possible.

We also have included a **Sustainable Development Clause** in our **contracts** to assure its commitment.

Maintaining integrity in dealings with employees, business partners, shareholders and the general public is an indispensable part of our culture and essential to maintaining high morale and producing fair, reliable and innovative products and services.

B. LABOR

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labor;
- Principle 5: the effective abolition of child labor;
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Intercruises promotes opportunities for women and men to obtain decent and productive work, in conditions of freedom, equity, security and dignity. That is in line with SDGs to achieve equitable and sustainable growth for all.

The company is in line with the labour principles and the national and international regulations and is in compliance with the sector collective labour condition negotiation structure that applies in each country, depending on national law for the Travel industry.

Our **Integrity Passport** serves as guidelines to **ethical working practices** dealing with workers, agents, suppliers, and customers.

Intercruises acknowledges the right to **collective bargaining** and **freedom of association**, trade

union membership, collective labour negotiation and representation of members by trade unions is not hindered at Intercruises. We support the freedom of association. Worker's representatives can be company's employees joined to a union or a group of independent employees.

Intercruises understands that slavery can occur in several forms, in August 2021 the Group published its fifth **Modern Slavery Statement** as a response to the UK Modern Slavery Act. It sets out the steps TUI Group has taken to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain up to and during the financial year ending 30 September 2020.

No employee will be compelled to work through force or intimidation of any form. We prohibit

any involuntary employment, the trafficking of persons or any form of modern slavery, forced or bonded labor. We also do not tolerate any other form of inhumane treatment of employees such as physical punishment or other abuse.

As part of our contract with suppliers and in our Code of conduct, we include some clauses related to employment conditions:

- Ensure compliance with applicable national law or industry standards, whichever affords employees the most protection, with regards to fair employment conditions including: written contracts, correct visa and working documentation in place, working hours, documented legal minimum wage, safe working environment, vacation time, leave periods and holidays.

- Treat workers with dignity and respect as understood and defined by the International Labor Organisation or Applicable Law, ensuring they can enter or terminate their employment through their own choice and access to relevant information on their employee rights;
- Shall not employ anyone against their will, traffic in persons or use any form of slave, forced or bonded labor and promptly inform the appropriate authorities where they reasonably suspect that any individuals associated with their businesses are at risk of human trafficking or similar exploitation.

Intercruises does not permit **child labour**, people under 18 are only employed in accordance with national regulations and the UN convention on the Rights of the Child, ensuring that International Labour Organisation conventions are fulfilled and we also engaged our supplies to follow that measures with our contracts and the Supplier Code of Conduct.

Intercruises implements preventive measures and procedures to ensure that **children are protected from tourism related sexual exploitation** and all potential forms of abuse and report any incidents and raise awareness of any identified risks to child safety involving guests, employees, and or local children on or near the premises to the relevant local authorities. Our suppliers also shall implement the same preventive measures.

The Group has signed up the Code of Conduct for

the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code - www.thecode.org) and will implement an Action Plan accordingly to protect children at local levels.

Intercruises ensures that employees are **not discriminated**. We strive to create the best environment for employees to innovate, develop and perform. Decisions about hiring, salary and the like must be based solely on objective reasons, rather than on the basis of personal characteristics, such as race or ethnicity, national origin, gender, sexual orientation, age, religion or conviction, or disability. We provide a working environment free of harassment. We include an Anti-discrimination clause in the Suppliers Code of Conduct.

Following the commitment expressed by the management to guarantee the efficiency of the principle of equality of treatment and opportunities between women and men within the company, Intercruises ensures a work-life balance with some measures for the reconciliation between work, private and family life:

- The company offers schemes for pregnancy, maternity and paternity leave for all employees depending on National laws.
- The company supports flexible working times or part time employment, for example, to support family obligations as well as to go on leave.

- It is possible to request additional holidays to the statutory paid leave per annum through salary sacrifice where operationally possible.

Our commitment is also to increase the proportion of women in management functions:

The proportion of women in the overall headcount rose further to 57.8%, 28.5% women in managerial positions and 30.0% of Supervisory Board. While the Group delivered increases in the proportion of women in managerial functions in the past four years, the numbers remained flat or declined in the period under review.

* 2019 Women in TUI: 55,2 % overall headcount, 35.7 % managerial positions and 38 % of Supervisory Board.

The company has strengthened its commitment with flexibility empowering colleagues to choose in where they are based or work from, as well as helping to provide a better work/life balance for them. The New Flexi working Guidelines possibilities that colleagues can choose to work remotely in their home location or work on a hybrid basis, which is splitting their time between their home and another working location. In addition to this with TUI WORKWIDE we also have the opportunity for individuals to work in a different country for up to 30 working days in any one calendar year.

C. ENVIRONMENT

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

We have embedded environmental and social considerations into business operations, because we believe it is vital to our company's future – sustainability delivers cost efficiencies, improves customer experience and drives engagement of customers, colleagues and suppliers alike.

The **Corporate Sustainability Policy** establishes the framework for identifying, monitoring and improving aspects of our company's environmental and social performance. In the policy we formulate our view on sustainability, giving an insight into our targets and the means to reach these targets. The policy reflects our commitment to sustainability within our operations, across the entire product life-cycle and with our colleagues, suppliers and clients.

The Sustainability Strategy will accelerate

Intercruises sustainable transformation, we will continue to focus on significantly reducing our environmental footprint in the areas of emissions, water, energy, and waste.

Actions in our 'Step lightly' strategy pillar aim to reduce the environmental intensity of our operations and set clear stretch targets for improvement across aviation, cruise, hotels, offices, retail shops and ground transport. TUI has implemented specific carbon reduction initiatives across the business – from airline and cruise efficiency programmes, to retail energy savings and the reduction of printed brochures

Due to the COVID-19 crisis, the key figures as of 30 September 2020 presented in the following sections are of limited or no relevance

Carbon Dioxide emissions (CO₂) and Energy usage (MWh) in our Major Premises and Ground Transport:

tons	2020	2019	Var. %
Major Premises*	18,189	24,542	-25,9
Ground Transport	5,235	18,277	-71,4

MWh	2020	2019	Var. %
Major Premises*	64,931	85,689	-24.2
Ground Transport	20,986	73,277	-71.4

We are already working on the evolution of Group's sustainability strategy up to the financial year 2030, reflecting current challenges and taking into account scenarios and mechanisms on a global scale, i. e. the EU Green Deal. The strategy will be published in 2021.

We encourage our **suppliers** to be more sustainable and environmental responsible using the Sustainable Development clause in our contracts and with our Supplier Code of Conduct. Supplier shall commit to actively manage their overall environmental impact by aiming to reduce energy, water and natural resource consumption, reduce the volume of solid waste, wastewater, environmentally damaging chemicals, and energy-related direct and indirect air emissions, as required by Applicable Law and regulations; avoid the use of single use plastic and promote the recycling, reusing, or substitution of materials; and implement purchasing policies and procedures which favour sustainable and locally produced goods and services in preference to imported products wherever possible and reasonable.

As a leading company in the travel industry, Intercruises acknowledges the level of public concern about the **animal welfare**. We are also aware that animal related issues are becoming more and more sensitive for our clients. If the Excursion Provider's business involves animals in any form, they must ensure that the 'Global Welfare Guidelines for Animals in Tourism', Minimum Standards and Specific Guidance Manuals are observed. Additionally, such businesses will ensure that all animals have been acquired legally and in accordance with the Convention on International Trade in Endangered.

We apply different actions in order to raise awareness on sustainability topics of Intercruises employees worldwide. We encourage our people to save water, energy and paper and to reuse and recycle waste with regular sustainability updates by emails and newsletters, available to all Intercruises employees.

As part of the Group Intercruises is committed to the reduction of single-use plastic. In 2019, we became one of the signatories of the International Tourism Plastic Pledge and we have achieved our target removing 257 million pieces of single-use plastic.

D. ANTI-CORRUPTION

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

UN key commitments include substantially reducing corruption and illicit financial flows, developing effective, accountable and transparent institutions, and strengthening access to information and participation in public decision-making. InterCruises has zero tolerance to bribery and corruption and gives particular focus to destination markets where perceived levels of corruption are high and with an absence of effective anti-bribery legislation.

Our products and services can compete on their own merits. We do not accept, demand, or promise any advantages that could influence us in our decisions. We also do not offer, make or authorise others to make payments (or anything else of value) in order to influence a government official or someone in another business to give us an improper advantage. Such bribery, as well as facilitation or »grease« payments, are not acceptable – irrespective of the local culture.

InterCruises is committed to ensuring that effective anti-bribery and anti-corruption procedures operate throughout all of its subsidiaries and to continue conducting business fairly, openly

and honestly with zero tolerance to bribery and corruption.

An **Anti-Bribery, Trade Restrictions and Business Ethics clause** is included in all contracts with clients and suppliers. InterCruises states that it takes a zero tolerance approach to breaches of international norms for trade, including bribery and corruption prevention legislation and applicable restrictions on trade, funds flow and financing terrorism. The Excursion Provider warrants that they do and shall comply with, and their Associated Parties do and shall comply with our **Supplier Code of Conduct** and all applicable local and international anti-corruption legislation and related procedures and codes from time to time in force.

For the purpose of this clause, the terms and conditions and the translations hereby shall be governed by, and construed and interpreted in accordance with applicable local and international legislation and related procedures and codes from time to time in force, including but not limited **to the UK Bribery Act 2010**.

In 2019, the Group implemented enhanced due diligence tools and processes in procurement to categorise high-risk services and suppliers in relation to modern slavery. Based on this comprehensive risk assessment of those suppliers can be done.

The Group addresses Compliance through its **Integrity Passport, Supplier Code of Conduct, Anti-Bribery, Trade Restrictions and Business Ethics, Data Protection and Information Security** and **Fair Competition processes**. In addition, regular communications and trainings to employees are performed.

All employees can report, anonymously and confidentially, breaches or misconducts using the **Confidential SpeakUp Line**, is operated by an external and independent provider and can be reached by phone or email in various languages 24/7.



Your **local** partner **worldwide**