



etraveli
group

Modern Slavery Act Statement 2025



1. Introduction

Etraveli Group is a leading global provider of search, book, and fulfillment services for flights and related products. This statement is published in accordance with the **Modern Slavery Act 2015** and sets out the steps taken by Etraveli Group during the financial year ending **31 December 2025** to prevent modern slavery and human trafficking in its business and supply chain.



2. Organisation Structure and Value Chain

Headquartered in Stockholm, Sweden, Etraveli Group has over 3 100 employees across ten global offices, including locations in Canada, Greece, India, Poland, Sweden, United Kingdom and Uruguay. In addition, we collaborate with more than 1 400 outsourced customer service professionals based in China, Egypt, Georgia, India, Mauritius, Philippines and Vietnam.

Employees are recruited through internal HR processes. For outsourced customer service operations, we engage with verified global business process outsourcing company partners.

Our value chain analysis is conducted at the tier 1 level, focusing on direct relationships across:

- **Upstream:** Sourcing of flight content, airline incentive agreements, ancillary products (insurance, luggage, carbon offsetting), software licenses, and purchased goods. This also includes employee transportation in India and outsourced customer service.
- **Own Operations:** B2B platform availability, OTA operations, content aggregation, in-house customer service, and all corporate supporting functions.
- **Downstream:** Distribution through sales and comparison platforms, customer travel, and waste management.

Supplier sourcing is guided by our internal Supplier and Partner Selection Policy. In addition, we expect our suppliers to adhere to our Supplier Code of Conduct. Before entering into agreements, we conduct due diligence to assess alignment with our standards and expectations.

We recognize our role in shaping responsible practices across this value chain. Our management team sets the strategic direction and embeds sustainability across all operations. The Senior Manager ESG & Sustainability and Compliance Director leads the integration of ESG risks and regulatory requirements into strategy, policies, and performance monitoring.

3. Policies

At Etraveli Group, we are committed to equal treatment and opportunity, safe and inclusive workplaces, and promoting human rights wherever we operate. We adhere to:

- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- EU framework for equal treatment in employment
- United Nations Convention against Corruption

In addition, the following internal Group policies support our human rights and decent working conditions efforts:

- **Anti-corruption, Gifts and Entertainment Policy:** Establishes a zero-tolerance approach to bribery and corruption.
- **Code of Conduct:** Sets ethical principles regarding integrity, human rights, and workplace respect.
- **Code of Conduct for Suppliers:** Outlines essential standards on human rights, labor practices, and health.
- **Global Sanctions Policy:** Ensures compliance with international trade sanctions.
- **Inclusion and Diversity Policy:** Promotes equal treatment and non-discrimination.
- **Internal Fraud Policy:** Addresses fraudulent behavior to ensure ethical operations.
- **Personal Data Privacy & Data Breach Policies:** Outlines how personal data is handled and managed in line with GDPR.
- **Supplier and Partner Selection Policy:** Requires partners to meet defined legal and ethical standards.



- **Sustainability Policy:** Outlines commitments to environmental, social, and governance (ESG) impacts.
- **Whistleblowing Policy:** Provides a framework for reporting misconduct confidentially/anonymously.

These policies are reviewed annually to ensure they remain effective and aligned with evolving legal requirements and best practices. Compliance is monitored through internal audits, risk assessments, and feedback mechanisms. Enforcement involves promoting accountability, providing training, and addressing any issues as they arise to support compliance.



4. Due diligence processes

Our due diligence framework includes the following key activities to identify, prevent, and mitigate risks related to human rights and decent working conditions, applied through a risk-based approach that ensures measures are proportionate to the scale, nature, and geography of our individual supplier relationships:

- **Supplier Self-Assessments:** We utilize questionnaires during the supplier selection process to gather direct information on labor practices, working conditions, and internal governance, for example.
- **Engagement with Strategic Partners:** We partner with leading global business process outsourcing providers for our customer service operations, which comprise over 1 400 professionals based in China, Egypt, Georgia, India, Mauritius, Philippines, and Vietnam. Our collaboration is built on a shared commitment to international labor standards, including comprehensive onboarding and training programs that are essential to mitigating risks related to high-pressure work environments and supporting employee well-being.
- **Annual Double Materiality Assessments:** We conduct annual materiality assessments to identify and prioritize impacts, risks, and opportunities. This process incorporates the CSR Risk Check to screen for sector- and country-specific risks, utilizing international benchmarks to ensure our due diligence efforts are focused on the areas of highest potential impact.
- **Grievance Mechanisms:** Available across Etraveli Group and include our independently managed Ethics Line for confidential and anonymous reporting.
- **Remediation:** We respond to any breaches or risks, through for example internal investigations, engagement with affected parties, and corrective action plans. These may involve contract review or termination in cases of severe or repeated non-compliance.

5. Risk assessment and management

Risk assessments are updated annually within the Double Materiality Assessment process by the ESG & Sustainability function, supported by relevant business units. This process incorporates tools such as the **CSR Risk Check** to screen for sector- and country-specific risks related to human rights and labor conditions using international data sources, such as the ILO and UN. We complement this with internal stakeholder input and supplier questionnaires.

In 2025, the following risks have been identified:

- **Working Conditions:** High-pressure customer service roles within the travel industry may affect employee well-being and retention, particularly where training or resource capacity is insufficient. At Etraveli Group, we mitigate this through rigorous recruitment in competitive labor markets and several weeks of paid, in-depth training .
- **Supply Chain Oversight:** Potential negative impacts may arise from human and labor rights risks within the supply chain if supplier policies are not followed or if appropriate remediation is not provided when issues occur. Such risks may be more pronounced in complex supply chains where visibility is limited and effective oversight depends on clear requirements and governance processes. At Etraveli Group, we mitigate these risks through a rigorous Supplier and Partner Selection Policy, limiting procurement and sourcing authorization to designated senior employees, and requiring formal approval for all new partnerships.

During the reporting period, Etraveli Group has not identified any cases of non-respect of international human rights or labor standards involving value chain workers.

6. Key Performance Indicators to Measure Effectiveness of Steps Being Taken

At Etraveli Group, we maintain a secure whistleblowing system, available to all employees. The platform is provided by a trusted third party to ensure confidentiality of the system. Reports can be submitted anonymously or with full identification, and we uphold a strict non-retaliation policy to protect those who raise concerns in good faith.

All submitted reports are reviewed promptly by a dedicated investigation team. This team follows a structured and fair process to assess the information, determine the appropriate course of action, and ensure that each case is handled with integrity and in line with applicable laws and company policies. When necessary, corrective actions are taken.

We maintain strong corporate governance through clear policies, employee training, and defined accountability. Our independent whistleblowing system reinforces transparency and trust across our operations.

The **Audit Committee** oversees regulatory compliance and ensures that reports meet legal and reporting standards. The **Board of Directors** is responsible for embedding sustainability in our strategic direction. This includes setting sustainability goals aligned with Etraveli Group's mission and values, reviewing performance, monitoring internal controls and risk management, and approving the final sustainability report

The **Executive Management Team** holds overall responsibility for delivering on the sustainability strategy and ensuring regulatory compliance. The **Senior Manager ESG & Sustainability and Compliance Director** jointly develop and execute the strategy by:

- Integrating ESG practices into day-to-day operations;
- Conducting materiality analyses to identify and prioritize risks and opportunities;
- Staying informed about regulatory developments to maintain compliance; and

- Driving key ESG initiatives across the business.

We are committed to continuously strengthening our governance framework in response to evolving expectations, stakeholder input, and legal requirements.

Given these indicators, we are confident that Etraveli Group is currently effective in managing the risk that slavery and human trafficking may be taking place in our business or supply chain, although this is, of course, a consideration that we will keep under continuous review.



7. Training and Awareness

We promote awareness and accountability through mandatory training on our Code of Conduct, covering compliance issues relevant to ethical business practices. This training is provided to all employees during onboarding, with regular refresher sessions to maintain understanding and ensure ongoing compliance.

We will continue to keep the training that we provide to our employees under review to ensure that we are up to speed with best practice.



8. Contact

For any inquiries or concerns, please contact:
compliance@etraveligroup.com or **sustainability@etraveligroup.com**.



9. Approval

This statement was approved on June 23, 2026, by the Board of Directors of Flugo BidCo AB in its capacity as the parent company of the group, for and on behalf of itself and its controlled subsidiary undertakings, including Flight Network UK Ltd.

Signed on behalf of Flugo Bidco AB by its authorized signatories:



Mathias Hedlund



Gustaf Martin-Löf