

SUSTAINABILITY REPORT 2022



Sunweb Group

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Foreword from our CEO

At Sunweb Group we believe that holidays provide a vital pause from our hectic lives and increase wellbeing. We love holidays ourselves and – with our trusted partners – we love helping many people enjoy theirs, now and in the future!

Last year, 2022, was the best in our history financially. Our recovery from the Covid pandemic was swift and successful. Our numbers are growing thanks to our great customer service, resilient business model and continuous investment in digitisation. With this power comes a big responsibility.

We celebrate the positive impact of holidays, yet we also understand the large environmental footprint that holidaymaking has today. Every day we, as an organisation and as individuals, feel the dilemma of living our purpose on the one hand, and the need to act on this knowledge on the other.

As one of Europe's leading holiday providers we do not wish to wait until our customers or governments force us to act. At the same time we realise that our business model, with no assets of our own, provides us little direct impact. We have to work with customers, partners, shareholders and authorities in a united effort to allow future generations to enjoy their holidays, and make our holidays more sustainable.

In 2022, we shifted our focus from compensating our CO₂ impact to investing in making our own holidays more sustainable. Ultimately, we believe people should be able to make well-informed decisions. Our role as holiday provider is to help our

customers make the best possible choice, and to make more sustainable options accessible.

This is Sunweb Group's first sustainability report. It does not seek to provide the best or only way towards sustainable holidaymaking. Neither does it propose big goals with deadlines that are decades away. What it intends to show is what we have done, are doing, will be doing, and our commitment to transparency.

Reading this report makes me proud. We have definitely started a movement – internally and with our partners. Yet there is no room for complacency. We've only just begun and there is no time to lose.

This report is also a request for help and further cooperation. Sustainability is not an arms race, nor the next competitive frontier. Only if all of us are willing to join in and make tough choices, we can safeguard future holidays in balance with the fragility of our planet's ecosystem.

Mattijs Ten Brink
CEO Sunweb Group



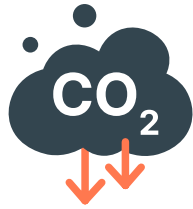
About this report

We are proud to present our sustainability report for financial year 2022. The reporting period is 1st November 2021 to 31st October 2022, unless otherwise stated. In this report, we share our progress on sustainability. We have structured our report around three pillars, Environment, Social and Governance (ESG). Each chapter focusses on one of these pillars, where we share our key achievements and highlight examples that reflect our results and challenges of the past year.

This is our first sustainability report which we aim to improve annually towards compliance with the EU Corporate Sustainability Reporting Directive (CSRD). Our business mainly consists of selling holiday experiences for which we combine third-party accommodation, transportation, car rental and other services.

We are an asset-light company; we do not own the airlines, accommodations or other services we provide. Therefore, we highly depend on data provided by our partners and calculations based on estimates (scope 3 emissions). We work on transparency through our scope 1, 2 and 3 emissions, and include downstream and upstream CO₂ data where available. We aim to improve our data year over year, in close collaboration with our partners.

Our key achievements in 2022



We shifted our environmental approach from compensating our impact to reducing our impact.



We introduced our first train holiday package; with Eliza was here to Puglia.



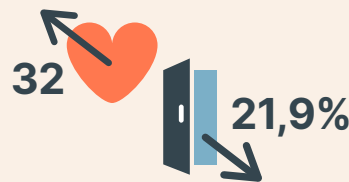
20 ambassadors took part in the Culture Crew; focusing on creating a culture of belonging and unlocking the potential of all talent.



We started investing in sustainable aviation fuel (SAF) through our partner Transavia, and through a new partnership with sustainable aviation fuel producer Neste. In 2022, we bought 532,500 litres of SAF, equalling 0.5% SAF on all our flights.



We conducted our first materiality assessment with sustainability consultant One Stone Advisors, including a wide variety of stakeholders.



By listening to our employees and focusing on improving their work environment, we were able to improve our ENPS from 9 (2020) to 32 (2022), and drop employee turnover from 33% (2020) to 21.9% (2022).



We secured over 500 million euro operational spend on local destinations through partner accommodations and agents, as well as payment of local salaries and purchasing.



We updated our Partner terms and conditions; introducing broader terms on integrity and environmental sustainability.

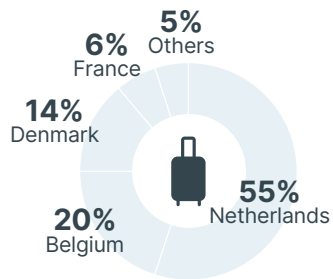


We implemented quarterly 'Reflect & Develop' sessions; providing our employees with time for reflection & learning.

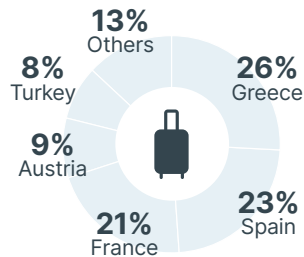
Our business

As one of the leading digital holiday groups in Europe, Sunweb Group is the driving force behind five brands across seven international markets – in the Netherlands, Belgium, Denmark, Sweden, France, the United Kingdom, and Germany. We have a pan-European identity with headquarters in Rotterdam and Zürich, software and web development in Girona, and various sales offices around Europe.

Customers per source market



Customers per destination country*



* Austria share underrepresented as partly closed during ski season 2021/22

Sunweb Group at a glance

Founded in
1991

2022
record result

1M+
customers

850M+
turnover

32
E-NPS**

7
source markets

100+
destinations

100%
direct sales

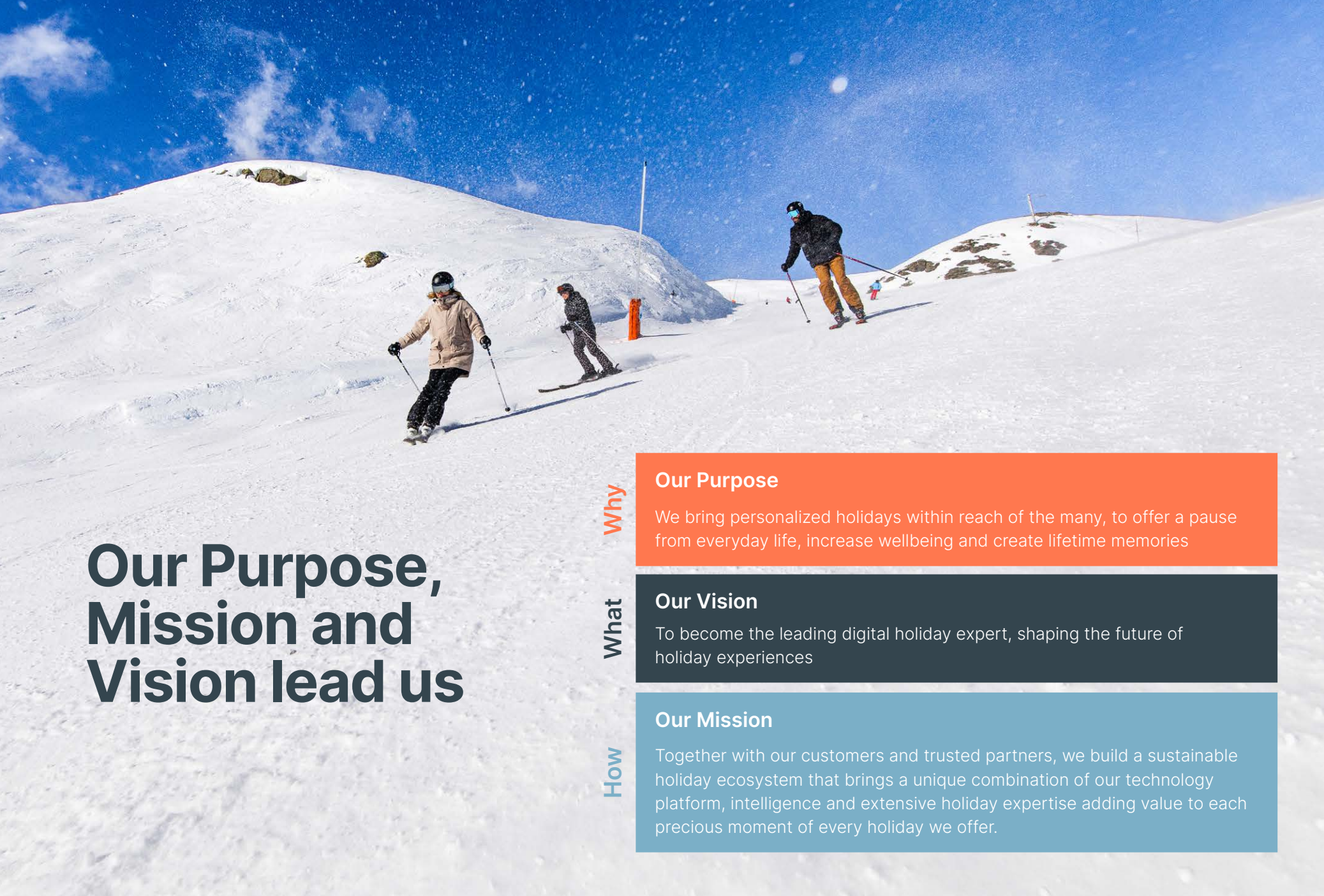
40
NPS**

57
P-NPS**

** Customer Net Promoter Score (NPS), Employee Net Promoter Score (E-NPS), Partner Net Promoter Score (P-NPS).

Pan-European player
with focused destination
offering





Our Purpose, Mission and Vision lead us

Why

Our Purpose

We bring personalized holidays within reach of the many, to offer a pause from everyday life, increase wellbeing and create lifetime memories

What

Our Vision

To become the leading digital holiday expert, shaping the future of holiday experiences

How

Our Mission

Together with our customers and trusted partners, we build a sustainable holiday ecosystem that brings a unique combination of our technology platform, intelligence and extensive holiday expertise adding value to each precious moment of every holiday we offer.

Our brands

As one of the leading digital holiday groups in Europe, Sunweb Group is the driving force behind multiple brands across 7 international markets – in the Netherlands, Belgium, Denmark, Sweden, France, the United Kingdom, and Germany. Discover our two main brands and find out how they create a well-deserved holiday experience for their holidaymakers.



**Sunweb**

Sunweb

Sunweb is undeniably Sunweb Group's flagship brand. It has grown into one of Europe's most well-regarded online players for package family holidays towards popular sun, ski and self-drive destinations.

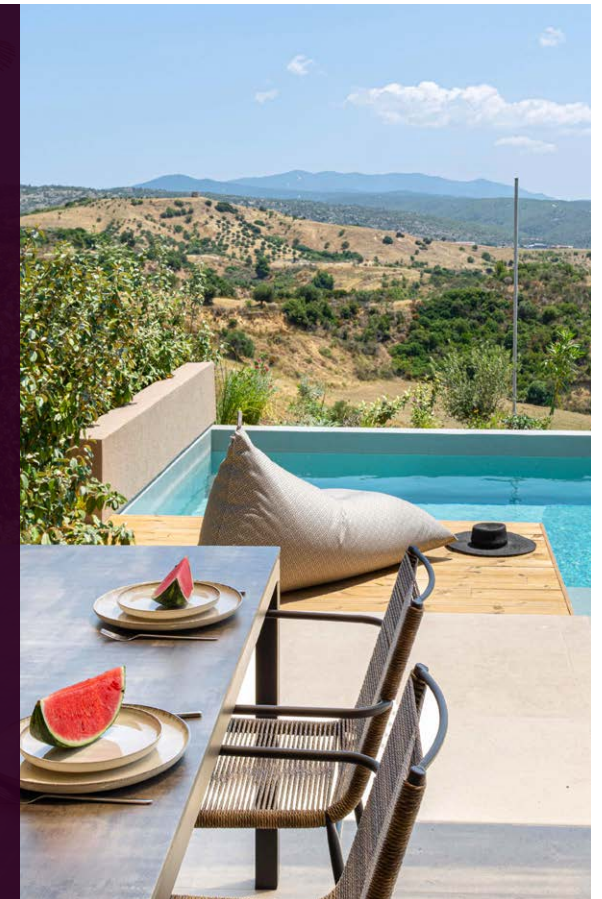
Sunweb focuses on shaping exceptional holiday experiences and creating unique memories through personalisation and innovation.

***eliza
was here**

Eliza was here

Are you looking for character, charm, authenticity and uniqueness? For boutique hotels, traditional quintas, stays like a windmill, a monastery, or a villa with a private pool?

Eliza was here takes you to holiday spots away from the crowds. To hidden gems in the Mediterranean, especially Greece, or to the Canary Islands. You'll come back with a unique story to share. Time after time.



Our journey towards more sustainable holiday making

We have a profound belief in the positive impact that holidays have on people. And we are proud of every great holiday memory we help make. But travelling also has an impact on our planet, our climate, our environment and local communities. That is why we are constantly working towards a more sustainable way of holiday making in all its aspects. One step at a time.

We take our responsibilities seriously. We continuously strive to lower our environmental footprint and improve our positive impact. ESG is the cornerstone of Sunweb Group's sustainability efforts: Environment, Social and Governance. This sustainability report is structured along these three pillars.

We work with our partners to lower emissions from transportation and accommodations, and invest in our local destinations to create jobs and grow prosperity. We focus on the wellbeing of our customers, our employees, our partners and their employees, as well as other stakeholders like local communities. At the same time, we have to acknowledge that there is still a lot to be done. We are still at the start of our own journey towards more sustainable holiday making.



We are very happy to share the swift progress we've made at Sunweb Group to become more sustainable. In 2022, we shifted our environmental focus from compensating our impact, to reducing our impact. To make sure future generations will also get to enjoy their holidays, we feel it's our responsibility to proactively contribute to lowering the footprint of holidays instead of compensating emissions ([Environment Chapter](#)). We also started working on a sustainability strategy.

As a first step, we conducted a materiality analysis with sustainability consultant One Stone Advisors, and included a wide variety of stakeholders ([Governance Chapter](#)). Further, we focused on transparency, of which this first sustainability report is an example. We see transparency as an integral part of becoming more sustainable. Firstly because transparency on ESG topics creates accountability. Moreover, it will create the opportunity for others to learn from our successes and mistakes, or to find out whether they can help us on this journey.

While we are proud of the steps we have taken in a short period of time, we are also very aware of the challenges ahead. That's why we also see this report as an [invitation to collaborate and challenge](#) us on this journey to more sustainable holidaymaking.



Chris Oskam - Head of Sustainability at Sunweb Group



Materiality assessment

A materiality assessment is designed to help identify and understand the relative importance of specific ESG and sustainability topics to an organisation. This involves looking at a variety of factors through two particular lenses: potential impact on the organisation, and importance to stakeholders. Sunweb Group conducted a materiality assessment in 2022, with the help of One Stone Advisors.

The outcome of this assessment is a materiality matrix, where the material topics affecting Sunweb Group and our stakeholders are mapped. The material topics are the 19 most important topics to Sunweb Group and our stakeholders, from an original list of over 150. They are categorised in Environment, Social and Governance, covering both risks and opportunities. For a description of the material topics, see [page 26](#).

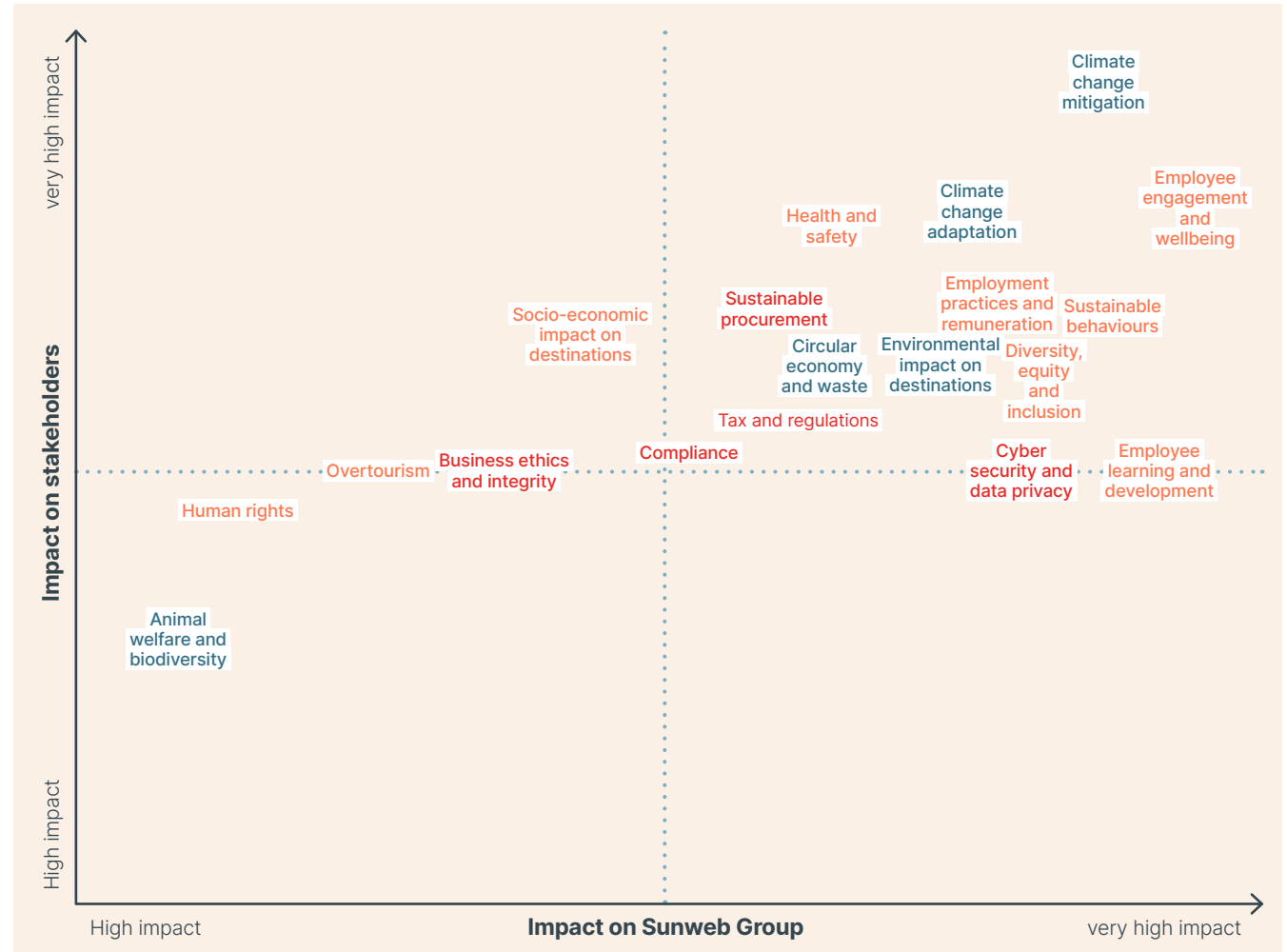
The materiality matrix combines research, internal stakeholder conversations, and testing with stakeholders through personal (anonymous) interviews. We included representatives of the following stakeholder groups: partners (accommodation, airline, agent), industry associations, shareholders, employees, customers, NGO, and auditors.

The materiality matrix served as a basis for our sustainability strategy, which we will share in the sustainability report for financial year 2022/2023.



Environment **Social** **Governance**

See 'Description of material topics', [page 26](#)



Environment

Environmental impact of the tourism industry

The tourism industry worldwide accounts for roughly 8% of carbon emissions (UNWTO), which highlights the urgency to lower the environmental impact of our holidays. Tourism contributes to climate change in a number of ways. For instance through transportation by air, rail and road, and by consumption of goods and services such as food, accommodation and souvenirs. Transportation is often the biggest creator of CO₂ impact.

From compensating to reducing our environmental impact

In October 2019, Sunweb Group started compensating the CO₂ impact of all holidays through offsetting emissions from transportation, transfers and accommodation. Over the years, we have invested in multiple renewable energy projects through our partner ClimateCare, for example through wind and solar energy parks. However, compensating emissions does not make our own holidays more sustainable.

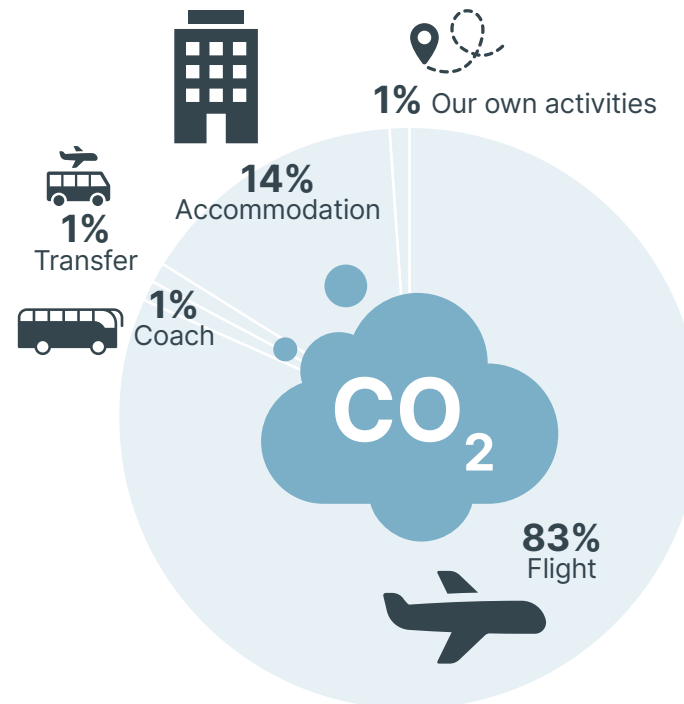
To make sure future generations will also get to enjoy their holidays, we feel it's our responsibility to proactively contribute to lowering the footprint of holidays themselves instead of compensating emissions. As of 1 June 2022, we stopped our offsetting programme. Instead, we aim to make our own product more sustainable. We focus on activities that reduce our footprint and invest in sustainable solutions for the tourism industry.

Our business' CO₂ footprint

Sunweb Group is an asset-light company; we work with partners to create our holidays. Our scope 1 emissions (emissions from sources that we own or directly control) are therefore very limited. However, since we sell package holidays, we look at the total emissions of the holidays we offer. From the total emissions of our holidays, over 80% comes from flights.

We're doing 2 things to mitigate emissions from flying. We're working to minimise its CO₂ footprint. Additionally, we include more climate-friendly transport options in our holiday packages, such as bus, train or car.

CO₂ emissions per business area, FY2022*



* Calculated based on internal data and ClimateCare CO₂ emission calculation model. Excluding rental car, self-drive and cruise travel as data is currently unavailable.

Making flying more sustainable

To many of our key destinations, there are currently no alternatives to flying. We try to minimise the CO₂ footprint of flying. As we do not own or operate our own aircraft, we are in ongoing conversations with our partners on topics like fleet renewal and route efficiency. Further, we only include direct flights in our packages as they emit significantly less CO₂ than connecting flights.

However, the most impactful measure to minimise emissions from flying in the short term is sustainable aviation fuel (SAF). SAF is the most sustainable fuel alternative currently on the market, emitting at least 80% less CO₂ in its life cycle compared to using fossil kerosine*.

In March 2022, we started investing in SAF with our airline partner Transavia, through a mutual sustainability fund. Per June 2022, we no longer compensate CO₂, and instead invest in reducing emissions from our own products. The funds generated by the move have allowed Sunweb Group



to partner with SAF producer Neste and purchase an additional 385,000 litres of SAF, which brings us to a total of 532,500 litres of SAF bought in 2022.

The fuel purchased is produced from 100% sustainably sourced renewable waste and residue raw materials such as used cooking oil. In total, through our partnerships with Neste and Transavia, we managed to secure 0.5% SAF on the total jet fuel usage for all of our flights. This 0.5% SAF is additional to the percentage of SAF our airline partners already add themselves. We aim to work with our partners to gradually increase this percentage over time.

While this initial SAF purchase is quite small, it is an important step towards making flying more sustainable. At the moment, less than 0.1% of all aviation fuel used globally is SAF. In order to reduce airplane emissions, we need to increase that share. Also, as a tour operator without its own aircraft, we aim to show with investing in SAF that sustainability is a responsibility for the tourism industry as a whole.

* Life Cycle Assessment on Environmental Impacts of Neste Renewable Polymers and Chemicals, 30 June 2021



Neste is committed to helping the aviation industry become more sustainable. Working together with innovative and forward-thinking partners who share our ambitions is the key to success. As one of the largest travel organisations in Europe, Sunweb Group is taking on the responsibility to make their offering more sustainable by buying SAF and applying it directly for their customers.

This collaboration is a first of its kind, and we hope it will inspire other forward-thinking organisations. The world needs these kinds of pioneers to lead the way towards a more sustainable future.



Jason Reichow - Vice President
Business Development Renewable
Aviation at Neste

Introducing lower-impact holidays

Another way to lower the environmental impact of transportation is to include other, less polluting types of transportation. One of the most sustainable modes of transportation is the train.

In 2022, we entered into a partnership with European Sleeper, and tried to develop a train holiday to our ski destinations in France. Unfortunately, we were not able to realise a train connection for winter season 2022/2023, due to insufficient availability of trains and other operational restraints. We are currently exploring all options to expand our train portfolio.

In the summer of 2022, we launched our first train holiday package, a pilot with our brand Eliza was here. A 12-day trip to Puglia in Italy by train, with an electric rental car ready at the destination. We are very proud of this initiative. Although still on a small scale, it's an important development towards more sustainable holidays. In summer 2023, we will build on this first successful pilot.



Sunweb Group wants to include more sustainable alternatives in its holiday portfolio. The team at Eliza was here was asked whether it was possible to offer a train trip for summer 2022. We were up for a challenge, especially to become more sustainable, and so we said “yes!” without hesitation. It turned out to be a huge challenge to get the train trip ready and live on our website in time, since it was a completely new product. However, we can proudly say that we went live with a train trip on 20 May 2022.

We organised a 12-day package holiday to Puglia. The train journey started in Amsterdam, Utrecht or Arnhem and arrived in Puglia the next day, via Basel and Milan. At the final destination, Bari, travellers could pick up an electric rental car to go to their accommodation and discover this beautiful part of Italy.

The trip had only been on our website for a few days when bookings came pouring in. Within a few weeks, we were completely sold out. It had become an massive success!

We also learned a lot from this pilot and received plenty of feedback from our customers. This was very valuable, because train trips are still new to us.

With all we've learnt, we can ensure we offer the best and most complete packages for our guests in the coming years. Because train trips will stay in Eliza was here's offering!



Meaghan Roodnat
Product manager at Eliza was here

Another more climate friendly-mode of transportation is choosing the bus or car. A bus out-performs a plane, comparing CO₂-emissions per passenger kilometre. Going on holiday by car is almost always more sustainable than going by plane. Looking at CO₂ emissions per passenger kilometre alone, a car holiday is more sustainable than going by plane when you drive with more than one person (so 2 or more people in the car)*. Emissions per person go down even further when sharing the car with additional passengers.

In addition, aviation has an adverse climate impact beyond CO₂, known as non-CO₂ effects. These effects include aircraft engine emissions such as nitrogen oxides, soot particles, oxidised sulphur compounds and water vapour that causes contrails. Collectively, these factors have a net impact of warming the atmosphere**. Moreover, innovation in the automotive industry, particularly with electric vehicles, has progressed more rapidly compared to the aviation sector.

We currently offer many bus and self-drive packages to our winter destinations, which make up 31% of all trips by our passengers. Out of those ski trips, 77% of passengers opt to use their own transportation, and 18% of passengers go by bus. Over the coming years, we aim to make the bus a more attractive option for our winter holidaymakers.

* BEIS/Defra Greenhouse Gas Conversion Factors 2019

** Updated Analysis of the Non-CO₂ Effects of Aviation, EASA, November 2020

Sustainable partner ecosystem

As we are an asset-light company, we closely cooperate with our partners to become more sustainable. We work on creating a more sustainable partner ecosystem. In 2022, we revised the terms and conditions with partners. In addition to the terms on, amongst others, compliance, data privacy, health & safety and human rights and labour laws, we included broader terms on integrity and environmental sustainability. A partner code of conduct has been prepared. As of 2022, verification of sustainability certification has been added to the process for contracting new and current partners.

We encourage all accommodations we work with to get Global Sustainable Tourism Council (GSTC) recognised certification, as they comply with the highest social, environmental and governance standards. GSTC-recognised certified accommodations are evaluated on their sustainability management, as well as socio-economic, cultural and environmental impact. Things like waste recycling programmes, water conservation measures, and local community support count towards the certification. Sharing our progress on more sustainable accommodations, together with our partners, will be one of the focus areas for the next sustainability report.



The environmental impact of our own organisation

As well as the environmental impact of our holiday packages, we're also improving the footprint of our own operations. We are working on multiple improvements to make our company more sustainable.

For our own employees, we have a sustainable mobility policy. We stimulate commuting by public transport and are transitioning

to a fully electric vehicle fleet for our lease cars. Currently, one third of our fleet is fully electric. As a digital company, we are open to working from home, and use online meetings where possible to avoid business travel.

Besides the energy (sources) we use for our mobility, we pay attention to the environmental footprint of our offices.

To further reduce our impact, we have installed energy-efficient lighting and sensor tabs, sustainable heating and cooling sources and use of green energy in our offices, where possible. On top of that, our Rotterdam office has a cold and heat storage system and the canteen has a green roof.

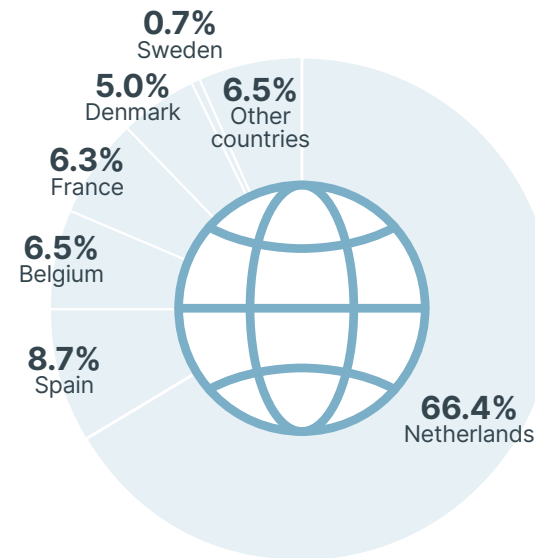
Social

Our people

To bring out the best in our people, we provide them with a creative, healthy and safe work environment. We also encourage a flip-flop state of mind; a mindset that breaks routines, explores new horizons and rewires the norm into something unexpected.

With our diverse team of over 500 people in multiple office locations across Europe (Rotterdam, Antwerp, Copenhagen, Paris, Zürich and Girona), our operational teams and guides at our destinations, we work together on creating lasting memories for our customers.

Country of birth percentages*



Male - female division*



Average age of all employees*

* Based on Sunweb Group employees in 2022, including operational teams and guides at destinations and external employees.



People, Organisation & Culture

We create an inclusive workplace where everyone can thrive and grow. That is the motto of our People, Organisation & Culture (POC) team. Every day, they go to work to create the best employee experience possible. Making sure people belong, feel engaged and are in the right place to learn and grow.

Our POC team focusses on 6 main strategies:

- 1 Strong & inclusive culture
- 2 Empowering leadership
- 3 Dynamic skills & capabilities
- 4 Inspiring & motivating benefits
- 5 Simple & scalable processes
- 6 Employee Experience (EX) service-driven delivery (employee support)

We highlight the work on two strategies in this report: strategy 1 (Strong & inclusive culture) and strategy 4 (Inspiring and motivating benefits). We measure our employee satisfaction through the Employee Promotor Score, which we will further explain in this report.



Strong and inclusive culture

From 2020 onwards, we co-created our core values with 80+ colleagues. Focusing on a culture of belonging – unlocking the potential of all talent. 20 ambassadors took an active role and became part of our culture crew.

On 29 October 2021, we organised a once-in-a-lifetime event connecting our values to personal stories, art and a unique Sunweb Group game. After this, in 2021/2022, we started living our values (I see you, We create together, I grow by courage, and We enjoy the journey) in monthly themes, in our leadership dialogues, and by translating our values to all steps of the Employee Journey.

Our values

I SEE YOU

I recognise others for who they are and embrace all of our differences so we can work in a safe environment.

WE CREATE TOGETHER

We work together to develop experiences, products and results that add value.



I GROW BY COURAGE

I stand up for my beliefs, lead by example and keep learning and innovating.

WE ENJOY THE JOURNEY

We celebrate our work, our colleagues, our progress and collaboration.



Inspiring and motivating benefits

In line with our culture, we flipped the way we look at compensation and benefits, focusing on the strengths, talents and future career of an employee. Instead of looking at past achievements, we focus on future impact. Employees are rewarded for setting strong learning goals and applying them on the work floor.

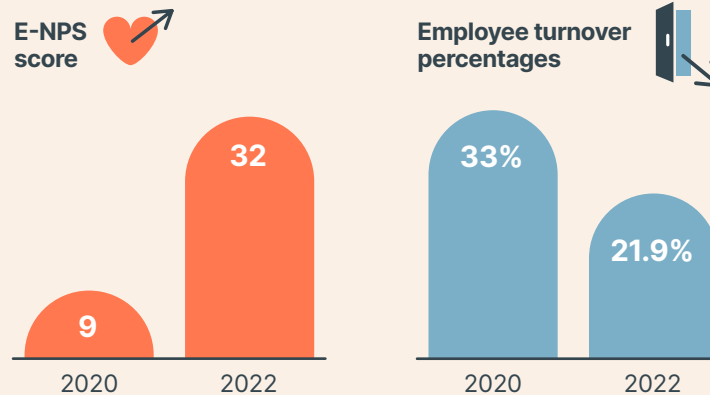
Our benefits are designed around the I See You value and cater to the needs of employees. They may choose their own learning journey in our Flip Academy. In quarterly 'Reflect & Develop' sessions, they get time for reflection and learning. We offer free external coaching throughout the year without interference from the manager or POC and let colleagues choose their place of work (at home or abroad).



E-NPS

After diving into the case studies on two of our POC strategies, we'd also like to show the measurable results of these efforts by sharing two metrics that were a 2022 priority. We measure our employee satisfaction via our employee-centric platform. Bi-weekly, we collect and analyse feedback across the full employee journey. This data helps managers and POC improve the employee experience.

By listening to our employees and focusing on improving their work environment, we were able to improve our Employee Net Promoter Score (E-NPS) from 9 (in 2020) to 32 (in 2022) and drop our employee turnover from 33% (in 2020) to 21.9% (in 2022). Our colleagues go to work happier, feel more engaged and have more impact.



Local destinations



In 2019 (prior to the Covid-19 pandemic), the travel and tourism industry contributed 10.4% to the global gross domestic product (GDP)*. After a sharp decline due to restrictions in mobility, the sector is expected to have contributed around 8% to the global GDP in 2022. These numbers highlight the importance of tourism as a driver of economic growth. In 2022, our operations brought in over 500 million euro to our destinations through our accommodation partners, agent partners and local salaries and purchases.

We not only care for our own employees, we also care about the people that work for us indirectly. We protect and support human rights. Each Sunweb Group partner must be compliant with all national and international regulations concerning human rights, including complying with regulations on minimum wages and maximum working hours.

* Economic Impact Report, WTTC, 2022

Health & safety

At Sunweb Group, we aim to ensure the health, safety and welfare of our employees, customers and others who may be affected by our operations and activities. Based on this, we have created a culture of safety and risk awareness throughout our organisation, to the benefit of our employees, partners and customers. We have a Safety Management System in place which is included in our employee onboarding and guide training.

To ensure the health and safety of our customers, we have partnered up with Intertek Cristal, a company specialised in delivering quality assurance related to health, safety, environmental & social accountability standards in the travel and hotel industry. All accommodations we work with are regularly assessed on health and safety standards via self-assessments and on-the-spot audits. Excursions are only offered after evaluation of, amongst others, risks related to the health and safety of our customers.

At most destinations, Sunweb Group guides are available 24/7 to help and assist customers when needed. Customers are offered to consult a doctor via the 'Holiday Doctor' app. This innovation perfectly aligns with our ambition to become the leading digital holiday expert in Europe, and our aim to fully engage with our customers digitally. Further, our 'Holiday guarantee' package allows customers to book their holiday with complete peace of mind. Should something change in their situation or at destination, we provide customers with the possibility to exchange their holiday up to six weeks before departure (or up to two weeks before departure at a surcharge) and with repatriation when necessary.



The Sunweb Group Holiday Doctor

During the Covid-19 pandemic, AXA Partners, Sunweb Group's travel insurance partner, and Sunweb Group jointly developed and launched the 'Holiday Doctor'; a service through which all customers in all our markets can connect with a General Practitioner via their smartphone or tablet – free of charge and in their own language.

Knowing that consumers were looking for peace of mind during their journey and at their destination, the common drive was to give our shared customers relevant, reliable health and safety information, comfort and control.

Since the borders reopened during the pandemic and people started travelling again, holidaymakers have increasingly used the Holiday Doctor. Simply via a real-time video link or through a 1-to-1 phone call with a doctor. Especially in destinations where there can be a language barrier or where first-line medical consultation is difficult to obtain, the Holiday Doctor offers holidaymakers enormous reassurance.

To this day, the Holiday Doctor is regularly consulted and highly valued by customers: an innovation that sets Sunweb Group apart from its competitors. ”



Joost C. Hesselt van Dinter

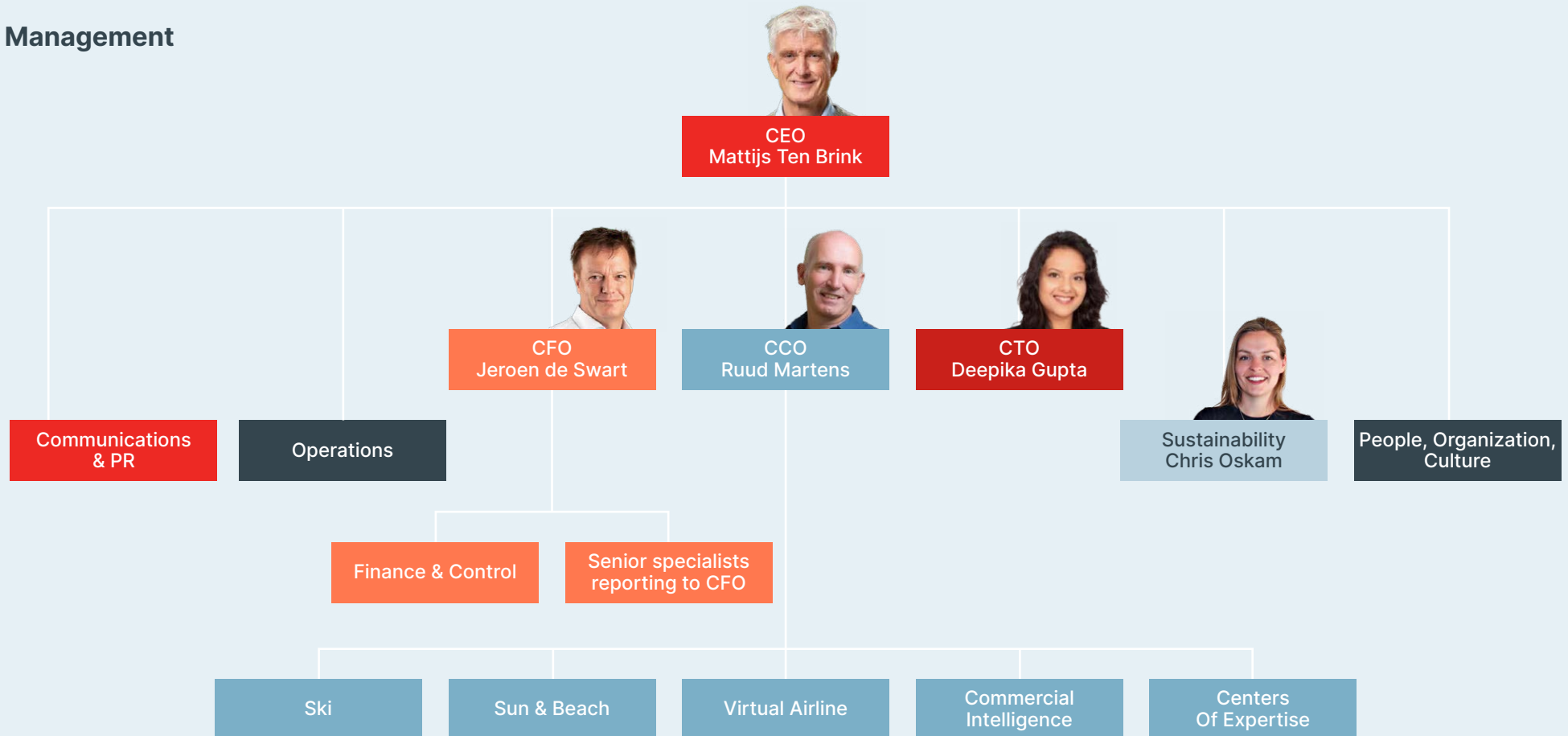
Business consultant at AXA Partners

Governance

Board of Directors



Management



Policies and guidelines



Becoming a better company through ESG

ESG is the cornerstone of Sunweb Group's sustainability efforts. The 'G' in ESG refers to corporate governance. From policymaking and distribution of responsibilities within corporations to stakeholder engagement and transparency. Governance factors indicate the rules and procedures for corporations. Effective corporate governance is essential for ensuring concrete action and change.

During financial year 2022, a dedicated Head of Sustainability has been added to the Sustainability team to further embed and enhance sustainability within Sunweb Group, including policies geared at ESG. Amongst others, policies are now in place on integrity, health, safety & wellbeing, data protection, cyber security and crisis management, and training and awareness are implemented or being developed. As part of governance, we ensure continuous alignment with current laws and regulations.

This first sustainability report, which we intend to improve year-by-year, is part of our preparation to comply to the Corporate Sustainability Reporting Directive (CSRD).

As part of our sustainability ambitions, we obtained the highest level of Travelife certification, a sustainability standard in the travel industry, in October 2021. We perform regular assessments on status progress on the ESG programme in alignment with our shareholders. The materiality assessment that was conducted in 2022 will be the basis of a new sustainability strategy.

With the ESG programme, Sunweb Group takes responsibility for its people and a sustainable development of the tourism sector, which we believe are conditions for long-term economic success.



Jeroen de Swart

Chief Financial Officer at Sunweb Group



Code of integrity

We are a leading customer-centric digital holiday provider with a trusted reputation in the package travel industry as a business that operates with the highest standards of integrity. We adopt an honest and professional attitude with a high standard of integrity and seek to act as a role model within our industry.

To ensure compliance with laws and regulations, we have drawn up a Code of integrity which sets out rules of conduct for our management, (flex) employees and other individuals acting on our behalf. With this Code, we provide clear and transparent rules and guidelines to promote integrity and ethical conduct – including rules of conduct on fraud, abuse and whistleblowing, conflict of interest, anti-bribery and corruption, anti-trust, anti-money laundering and trade sanctions and confidential information.

Speak-up policy

We have a process in place to speak up when experiencing or witnessing inappropriate, unwanted or dishonest behaviour. This includes the possibility to speak with or report anonymously via an external counsellor.

Data protection policy

We process personal data. This data consists of information about customers, employees, business partners, suppliers and other people who we have a relationship with in any way. These people show trust in the way we deal with their personal data. We must take our responsibility by dealing with their personal data with the utmost care and responsibility.

Our data protection policy describes how personal data must be collected, handled and stored to meet the company's data protection standards and to comply with the General Data Protection Regulation (GDPR).

Cyber Security policy

Protection of our information systems and data is of the utmost importance to us, our investors, investee companies and regulators. Consequently, we strive to meet or exceed the industry's security best practices. Everyone at Sunweb Group plays an important role in achieving this goal and should understand their specific responsibilities in relation to information security.

Our cyber security policy sets out how we manage cyber security risks, defines responsibilities in managing these risks, establishing processes and procedures for responding to cyber security incidents, and establishes a post-incident review policy.

Crisis management during the Covid-19 pandemic

During the recent pandemic, our crisis management skills were extensively yet successfully tested. After the first Covid cases in one of our hotels in Gran Canaria, we immediately went into crisis management mode.

Our first priority became repatriating almost 100 thousand holiday guests, mostly from ski resorts in the Alps, to their home countries. Time pressure was huge as most countries were closing their borders and many airlines stopped flying. Our next step was dealing with upcoming bookings and getting to grips with a constantly changing environment and government recommendations and regulations. Third was ensuring compliance with the working conditions for our own staff throughout our six offices in Europe and quickly thereafter, facilitating working from home.

In the meantime, together with our board and shareholders, we created various scenarios for safeguarding financial stability and continuous liquidity. Together with our financial partners, and using various government facilities, we refinanced our company and created room for continuous investment in our business. A last, shorter-term priority was restructuring our organisation and drastically reducing our cost base downward.

Finally, our focus shifted towards the future. In our crisis management set-up, we worked with three time horizons: One team focusing on dealing with day-to-day operations and all the short-term changes. A second team focusing on 'winning the start-up', ensuring we were ready once markets and destinations would open up again. And a third, post-crisis team redefining our long-term strategy.

During this time, three things were at the heart of our successful management of this extraordinary situation: in the very first week we created guiding principles providing a simple and clear framework for all our decisions. Secondly, we created a consistent rhythm in our crisis management meetings throughout the whole organisation, supporting a seamless flow of information top-down and bottom-up. Lastly, we put a lot of explicit effort in keeping our employees, customers, partners and other stakeholders informed, ensuring their continuous engagement and support.

Our increasing employee, partner and customer experience scores throughout this period, combined with our financial health and the fact we had our best financial year directly after the pandemic, are proof of our successful crisis management and the resilience of our asset-light business model.



Crisis management plan

Our crisis management plan informs and provides clarity including action cards on steps to be taken at different crisis situations – like fire, injury, customer incidents, cyber security and data protection incidents, and events with potential impact on our reputation.

Risk management

Risks of a strategic, operational and financial nature are an inherent part of business and are embedded via regular risk reviews and monitored

via a risk heatmap. As part of our performance management, we monitor the mutual developments of capacity, sales speed, margins and expenses on a daily basis. Based on these analyses, we take the measures required to adjust the relevant items, monitoring their effect and results.

As risk profiles change, monitoring, processes and systems are adjusted accordingly to ensure we can continuously monitor and control our overall risk profile. When detecting opportunities in the market, we are capable to swiftly and appropriately respond,

integrating any risks involved into our risk control process and systems immediately and responding directly, for example by renegotiating contracts.

Improvement of the underlying processes and systems in an agile way is a continuous point of attention. This leads to improved insights and responses, resulting in better margins, occupation rates and increased results. Managing these risks is in our DNA, as external factors have a direct impact on our operations.



Travelife Certified

Travelife is a sustainability accreditation scheme, providing guidelines and measurement systems on sustainability in the travel industry. It considers the management of environmental, social and governance criteria such as energy efficiency, waste management, human rights, and cultural impact. In October 2021, Sunweb Group achieved the highest Travelife certification status: Travelife Certified.

Our sustainability efforts are followed up by Travelife's independent auditors every two years. Our first recertification will take place in 2023.



Invitation to collaborate and challenge

While we are proud of the steps we have taken in a short period of time, we also are very aware of the challenges ahead.

One of the objectives of transparency is to learn from others.

Do you see possibilities to collaborate, in order to make the tourism industry more sustainable? Is there something you have feedback on?

Please do not hesitate to contact us.

You can reach us on sustainability@sunwebgroup.com.



Sunweb Group

Annex

Description of material topics

Environment topics (5) Description

Animal welfare & biodiversity	Ensuring the humane treatment and wellbeing of all animals within the value chain. Keeping impact on flora and fauna to a minimum, including value chain impacts.
Circular economy & waste	Reducing impact on the world's resources through reduction, reuse and recycling throughout the customer journey.
Climate change mitigation	Reducing carbon emissions from our operations and across our value chain to align with the Paris Agreement. Supporting the energy transition in destinations.
Climate change adaptation	Supporting destinations to adapt to the changing climate.
Environmental impact on destinations	Reduce negative impacts on water, soil, plant and animal life and materials at all destinations.

Social topics (9) Description

Diversity, equity & inclusion	Creating a diverse, equitable and inclusive working environment at Sunweb Group and its partners. Actively embedding approaches to ensure that all customers are treated fairly.
Employee engagement & wellbeing	Nurturing a healthy working environment to support employees' engagement, motivation, physical and mental health.
Employee learning & development	Enabling career development and employability for employees at Sunweb Group and its partners.
Employment practices & remuneration	Ensuring that people are employed and paid on fair and equitable terms at Sunweb Group and across our value chain.
Health & safety	Providing a secure, safe and healthy working environment at Sunweb Group and its partners. Ensuring the health and safety of all our customers.
Human rights	Upholding human rights throughout our value chain, including the protection of children in our destinations.
Overtourism	Working with destinations, partners and customers to address the impacts of overtourism.
Socio-economic impact on destinations	Ensuring that the value created by tourism (including both procurement policies and customer spending) is shared with local destination communities.
Sustainable behaviours	Bringing all stakeholders – such as customers, employees and partners – with us on our sustainability journey, and encouraging them to adopt more sustainable behaviours.

Governance topics (5) Description

Business ethics & integrity	Embedding policies and practices to normalise ethical behaviour across the business. Adhering to robust systems that prevent anti-competitive behaviour, bribery and corruption.
Compliance	Adhering to codes and regulations across our activities, countries and companies – including consumer protection (e.g. consumer rights, unfair business practices, price indication, PTR, H&S and broadcast codes) and business law (e.g. formation, employment, intellectual property, contract and negotiations, lawsuits and anti-trust). Implementing a transparent system of risk assessment and management, including geopolitical risk.
Cyber security & data privacy	Adopting and maintaining leading practices to anticipate and manage cyber threats. Managing risks associated with collecting, storing and using consumer, client and employee data.
Sustainable procurement	Ensuring (e.g. through a supplier code of conduct and audit programme) that good practices in social and environmental impact are observed.
Tax & regulations	Taking an approach to tax footing that aligns with the business' sustainability goals.