

# Sustainability report 2024



Sunweb Group

# Contents

## 03 Foreword from our CEO

## 04 About this report

## 05 Key achievements in 2024

## 06 Our business

Our Purpose, Our Vision, Our Mission  
Our flagship brands  
Sustainability Strategy  
Sustainability targets  
Stakeholders  
Our Value Chain  
Double Materiality Assessment

## 22 Environmental

E1 Climate Change  
Material topic: GHG Emissions  
Material topic: Energy mix & consumption

## 32 Social

Create Social Impact  
Key employment figures

### S1: Own workforce

Material topic: Working conditions  
Material topic: Gender equality & equal pay for work of equal value  
Diversity, Equity, Inclusion & Belonging (DEIB)

### S3: Affected communities

Material topic: Impact on destinations

### S4: Consumers and end-users

Material topic: Cyber security & data privacy  
Material topic: Access to (quality) information  
Material topic: Customer service and satisfaction

## 46 Governance

### G1: Business conduct

Material topics: Corporate culture  
Material topic: Management of relationships with partners including payment practices  
Material topic: Compliance with regulations

## 53 Invitation to collaborate and challenge

## 54 Annex

List of abbreviations  
Description of material topics  
Link between last and this year's material topics



# Foreword from our CEO

At Sunweb Group, we believe that everyone deserves a holiday – because a holiday is so much more than just a few days away. Travel broadens horizons, it's a chance to recharge, to create new memories, and truly enjoy life. At the same time, we recognise that the travel industry has a negative impact and we must strive to make it more sustainable for the environment, our consumers, our partners and employees. However, we remain realistic: travel will always have an impact; what matters now is how we manage that impact.

As a large European holiday provider, we take our responsibility seriously. Together with our partners, colleagues and industry associations, we continuously explore ways to make travel and with that our business more sustainable– now and in the future. Sustainability sits at the foundation of our strategy; it is embedded throughout our strategic plans and initiatives.

Helping our customers make responsible choices is a priority for us. We do this by guiding them in selecting the right accommodations, transportation, and travel services. We've recently been working on integrating a sustainability filter into our booking experience, enabling customers to make more informed and eco-friendly travel choices. Our focus on sustainability and responsibility also means making deliberate choices about the partners we work with and actively supporting them in taking the necessary steps forward.

To ensure continuous improvement, we invest significantly in ESG (Environmental, Social and Governance) initiatives and reporting. One of our key investments has been the formation of a dedicated ESG team. This team consists of experienced professionals, including a Head of Sustainability, a Sustainability Lead, and from January 2025, an ESG Reporting Lead. This team collaborates with many people across the business and is committed to optimising our sustainability performance every day. ESG reporting enables us to keep track of the progress of our initiatives.

As the CEO of Sunweb Group, I am committed to making our offerings, organisation and operations more sustainable. With my experience, I strive – alongside my colleagues – to improve our own sustainability efforts and drive positive change across the industry. We are proud to present the Sunweb Group Sustainability Report for the fiscal year 2024, which provides a comprehensive overview of our progress and ongoing commitment to ESG.

Finally, I would like to express my sincere gratitude to our employees, customers and partners for their continued dedication and collaboration. Only together we can create a more sustainable future for our industry.

**Mieke De Schepper**

CEO, Sunweb Group



# About this report

We are proud to present our third sustainability report. The reporting period of this Sustainability Report is in line with the reporting period of Sunweb Group's financial statements: 1 November 2023 until 31 October 2024, unless otherwise stated.

In this report, we share our progress on sustainability, structured around the material topics identified within the three ESG pillars: **Environmental**, **Social** and **Governance**. This structure follows the guidelines of the EU's Corporate Sustainability Reporting Directive (CSRD). As part of this process, we conducted our first double materiality assessment in line with the European Sustainability Reporting Standards (ESRS), and organised the material topics into sub-chapters under each ESG pillar.

We have been actively working towards compliance with the CSRD. However, after the presentation of the EU Omnibus<sup>1</sup> package of the European Commission on 26 February 2025, Sunweb Group will no longer be within the scope of the CSRD – if and when this package is agreed upon by the EU parliament.

Regardless, we will continue with ESG reporting as we believe it is an excellent accelerator that will help us create value, improve risk management,

monitor the progress of our sustainability initiatives and take appropriate action.

In this report, we share our key achievements and highlight examples that reflect our results and challenges of the past year. We aim to follow the structure of the CSRD as much as possible. For now, we will await any implications that the Omnibus will have on our next report, potentially based on the voluntary standards, as we continue to transparently report on our progress in the ESG domain.

Our main business is selling holiday experiences, for which we combine third-party accommodation, transportation, car rental, excursions and other services. We are an asset-light company; we do not own the airlines, accommodations or other services that we offer. Therefore, we highly depend on data provided by our partners and calculations based on estimates (such as for Scope 3 emissions).

We are working on transparency throughout our entire value chain and aim to include downstream and upstream data where available. To do so, we are actively working on improving the accuracy of our sustainability data year after year, in close collaboration with our partners.

<sup>1</sup> [https://commission.europa.eu/news/commission-proposes-cut-red-tape-and-simplify-business-environment-2025-02-26\\_en](https://commission.europa.eu/news/commission-proposes-cut-red-tape-and-simplify-business-environment-2025-02-26_en)



# Key achievements in 2024



## Environmental

- Launch of **sustainability search filter** on our Sunweb and Eliza was here websites, which allows customers to search for accommodations with a sustainability certificate.
- **10% of our partners** has a **sustainability certificate**.
- We have initiated a **Green Key partnership programme** to support our hotels in achieving sustainable certification, with the launch planned for early 2025.
- **Green Key:** Sunweb Managed SDP hotel 'Residence Club Margot Superdévoluy' was the first SDP hotel to receive a Green Key<sup>2</sup> certificate.
- **SAF:** we continued investing in Sustainable Aviation Fuel (SAF). Alongside our existing partnership with Transavia, we expanded our efforts to Brussels Airlines. In 2024, we bought 505.150 litres of SAF, equalling 0.5% SAF on all our flights.



## Social

- As a reflection of employee satisfaction, our **eNPS** increased from **+3 to +24**<sup>3</sup>.
- We organised a **Sustainability Week** for our colleagues featuring 35 activities including community volunteering.
- We launched our **wellbeing programme Focus on You**. It aims to create a healthier, more energised work environment for all. Team workations: we organised 3 workations for a total of 36 employees.
- We continued our **leadership programme** for around 40 colleagues. We also had our first group of 9 experienced professionals; cultivating a culture of continuous growth and development. A new learning platform was introduced: LinkedIn Learning opportunities for all our colleagues.
- As part of our DEIB (Diversity, Equity, Inclusion and Belonging) strategy **33% of our (sub)top management is female**.
- **Giving back to society:** we gave away two trips to Egypt and Turkey for families in need through Stichting Reis met je Hart (Travel with your Heart Foundation, NL).
- Moving towards **employing local guides** at our destinations, in cooperation with our partners and **digital guides**.
- Developed tailor-made **cybersecurity Crown jewels** assessment to reduce risk of data breaches and cyber attacks.



## Governance

- **Double materiality assessment (DMA):** we conducted a DMA based on the European Sustainability Reporting Standards to validate the material topics we reported on in the past, as well as add new material topics.
- We received a **positive assessment result** from the Netherlands Authority for Consumers & Markets (ACM on **price transparency across** our Dutch websites.
- Sunweb won the award for **World Best Ski Tour Operator** for the 7<sup>th</sup> time; showing that the brand continues to provide first-class holidays at affordable prices.
- A **health & safety** policy became part of our partner contracts. For all hotel and agency contracts, we went from self-assessments to a mandatory addendum in the contract.

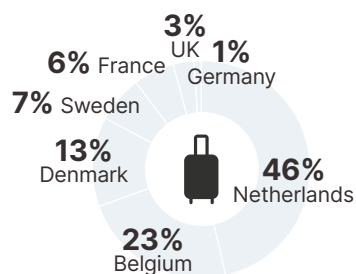
<sup>2</sup> Green Key is the leading standard for excellence in the field of environmental responsibility and sustainable operation within the tourism industry. Source: [www.greenkey.global](https://www.greenkey.global)

<sup>3</sup> This figure is based on Sunweb Group employees; it excludes our guides at destination, SDP employees and external staff.

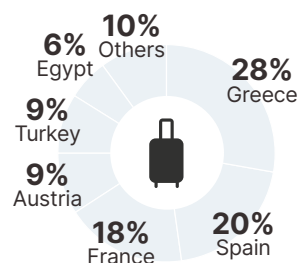
# Our business

As one of the leading holiday providers in Europe, Sunweb Group is the driving force behind multiple brands, including our two flagship brands (Sunweb and Eliza was here) across 7 international markets: 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\***



## Sunweb Group at a glance

**1.3m**  
total customers

**500+**  
employees

**7**  
source markets

**2**  
flagship brands

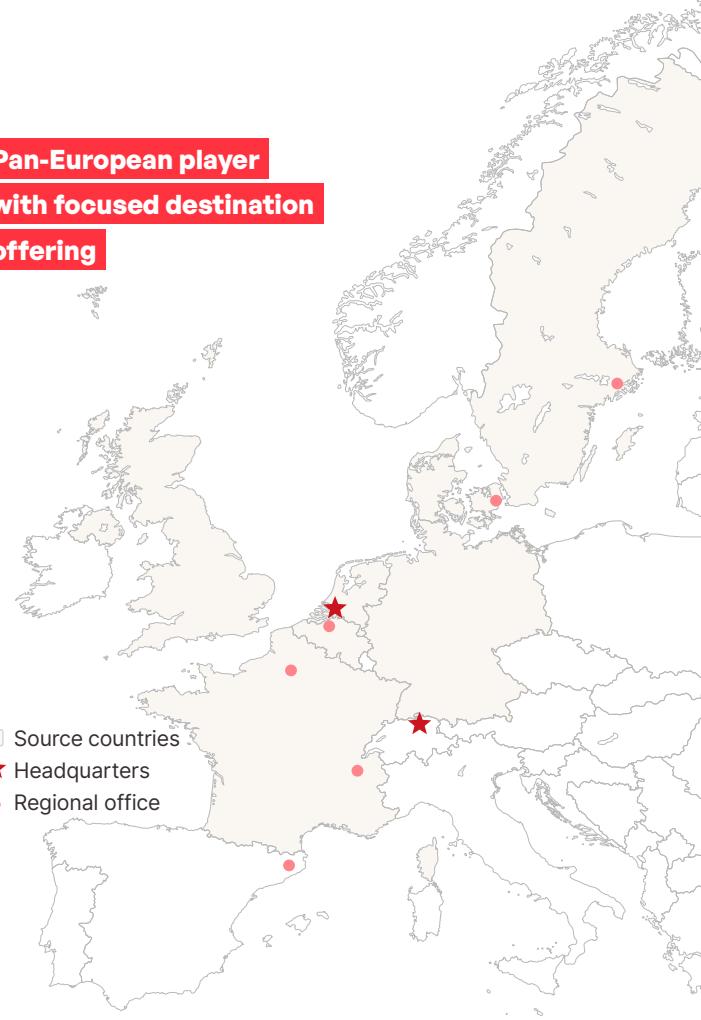
**100+**  
destinations

**100%**  
direct sales

**5.500**  
key partners

**Pan-European player  
with focused destination  
offering**

□ Source countries  
★ Headquarters  
● Regional office





A photograph of three children running along a sandy beach towards the ocean. The child on the left is a boy with blonde hair, the middle child is a boy with dark curly hair, and the child on the right is a girl with long dark hair. They are all carrying large inflatable rings: the boy on the left has a red one, the boy in the middle has a pink one with a clear section, and the girl on the right has a pink one with colorful sprinkles. The ocean is a vibrant blue with white waves breaking on the shore. In the distance, there are low mountains under a blue sky with scattered white clouds.

# Our Purpose, Mission and Vision lead us

Why

## Our Purpose

We believe everyone deserves a pause from everyday life, to increase wellbeing and create lifetime memories.

What

## Our Vision

We shape the future of holidays by combining the best of online travel agencies (OTA) and traditional tour operators (TO).

How

## Our Mission

We bring personalised holidays within reach of the many, by combining our holiday expertise, service capabilities, technology and data-driven intelligence, and collaborating closely with our customers, partners and employees.

## Our flagship brands

Sunweb Group operates several brands across 7 home markets. Discover our two flagship brands and find out how we create a well-deserved holiday experience for our holidaymakers.



### Sunweb

As the flagship brand of Sunweb Group, Sunweb has established itself as one of Europe's most reputable online providers of family package holidays to sought-after sun and ski destinations.

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



### Eliza was here

Character, charm and authenticity.

Eliza was here offers unique holidays, always including flights, accommodation and rental car. From boutique hotels, traditional quintas, and accommodations like a windmill or a monastery to a villa with a private pool. Holiday residences in the local style, situated in a quiet, beautiful environment away from the crowds. Hidden gems in the Mediterranean – especially Greece – or on the Canary Islands. Eliza was here focuses on creating unique holiday stories to share, time after time.







## Governance structure

On these pages, you find Sunweb Group's governance structure. This overview covers the Board of Directors, our top management, and how sustainability is integrated within the company.

Environmental, Social, and Governance (ESG) matters are managed across different areas of the organisation and are overseen by the Board of Directors. Sustainability is a recurring agenda item in the bi-monthly Audit Committee meetings, where progress updates are shared. Moreover, important issues such as our sustainability strategy, target-setting and annual reporting are addressed or, where relevant, formally approved by the Board of Directors. We also provide quarterly reports on ESG matters to our investors.

The Director of People, Organisation & Culture (POC) and their team oversee most internal social sustainability topics. Social sustainability topics related to our value chain, as well as most environmental sustainability topics, are managed by our Head of Sustainability in collaboration with various internal and external stakeholders.

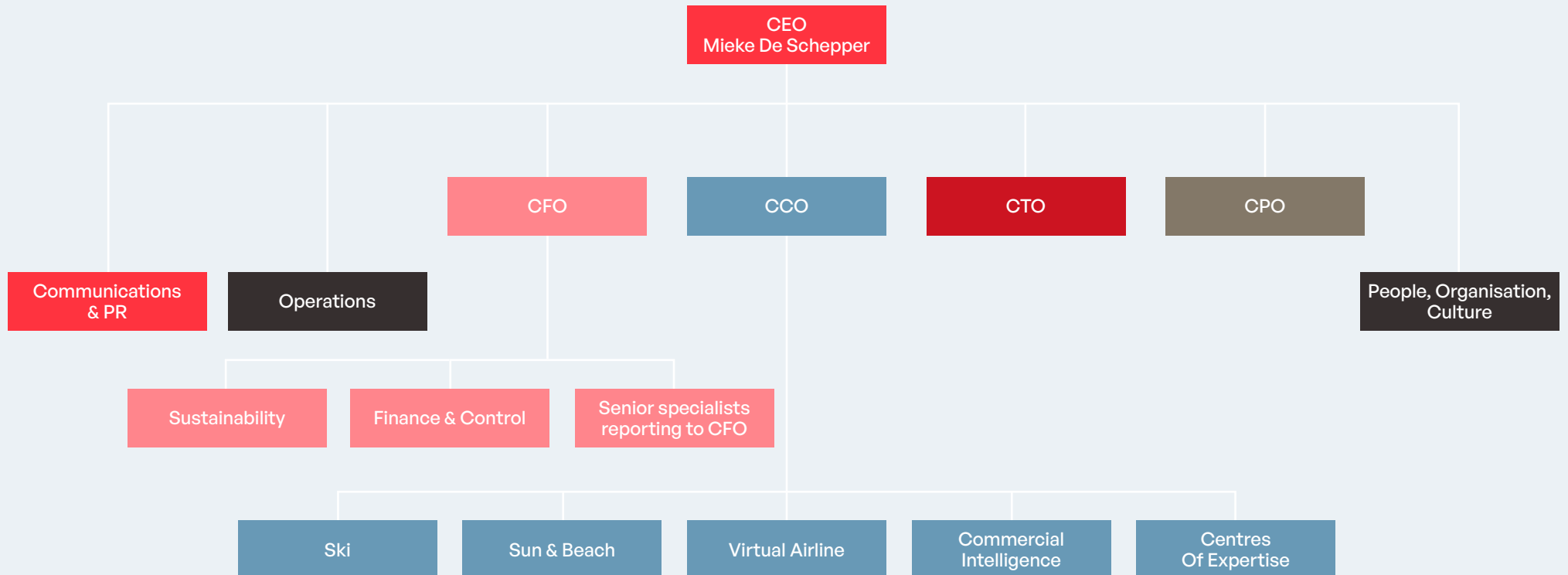
Governance matters are managed by our Legal Counsel and Compliance Officer & Data Protection Officer (DPO), together with the Head of Sustainability and relevant internal and external stakeholders.

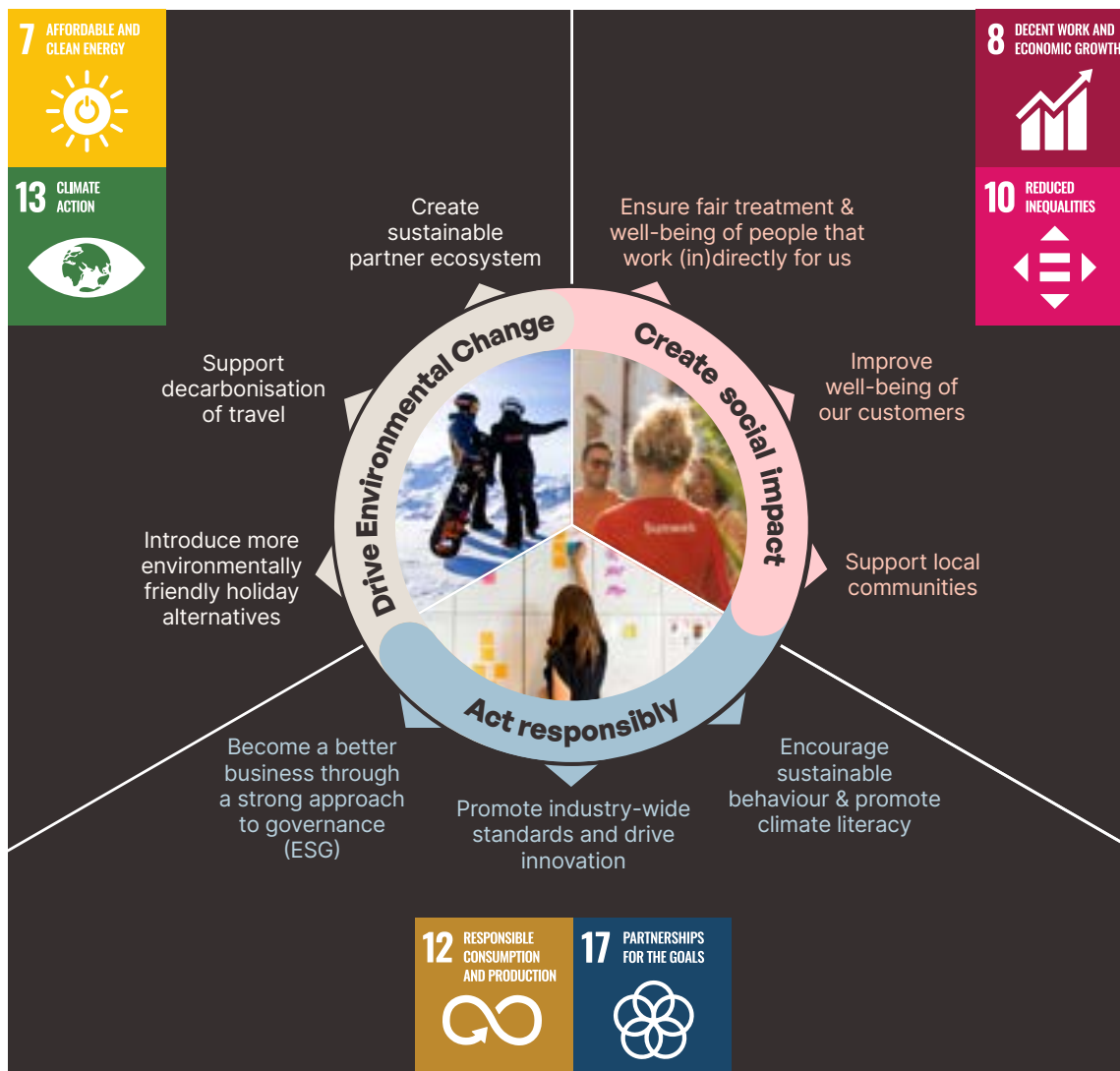
During monthly sustainability meetings, ESG topics are discussed, initiatives are advanced, and any obstacles are addressed. These meetings are led by our CFO, and various disciplines and departments take part: Sustainability, POC, Legal, Compliance, Information Security, Facility & procurement, and the Quality & Assurance Manager. Other colleagues are invited based on the agenda and relevant topics.

## Board of Directors



## Management





## Sustainability Strategy

It all starts with embedding sustainability within the company's strategy. Sustainability (as 'Better & Sustainable Company') was embedded as a strong organisational foundation in our updated 2024 companywide strategy, along with 'Tech & Operational Efficiency' and 'Great Place to Work'.

In 2024, we updated our sustainability strategy slightly, based on significant topics that arose in our double materiality assessment. Our sustainability strategy is centred around the 3 ESG pillars, each focusing on specific topics that we continuously work on to advance our sustainability efforts.

For each pillar, we have defined key focus areas. We set targets for 2030 and an Action Plan for 2025 that guide us. By starting to direct our efforts towards these topics, we intend to reach our entire value chain – from destinations to any stakeholders we build relationships with.

### Stakeholder involvement

Our sustainability strategy is a result of a thorough and rigorous development process, which commenced with a 2022 materiality assessment. Subsequently, we facilitated multiple rounds of workshops with employees to solicit input and feedback at various stages of the process.

In 2024, we carried out a new double materiality assessment (DMA), this time based on the European Sustainability Reporting Standards (ESRS) in line with the EU's Corporate Sustainability Reporting Directive (CSRD). Throughout, the Board of Directors was involved in the process and approved the renewed version of the strategy at the end of 2024.




## Sustainable Development Goals

The Sustainable Development Goals (SDGs) are a collection of 17 interlinked global goals set by the United Nations General Assembly in 2015. They are aimed at addressing various social, economic and environmental challenges worldwide by the year 2030. They cover a wide range of issues including poverty, inequality, climate change, environmental degradation, peace, and justice.


For tourism, the SDGs are highly relevant as they provide a framework for sustainable business practices that can help mitigate negative impacts on local communities and the environment while contributing to positive social and economic outcomes. The following SDGs are particularly relevant for Sunweb Group and are interlinked with the three pillars of our sustainability strategy:

**7** AFFORDABLE AND CLEAN ENERGY




**Goal 7** - Ensure access to affordable, reliable, sustainable and modern energy for all

**13** CLIMATE ACTION



**Goal 13** - Take urgent action to combat climate change and its impacts

**8** DECENT WORK AND ECONOMIC GROWTH




**Goal 8** - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

**10** REDUCED INEQUALITIES



**Goal 10** - Reduce inequality within and among countries

**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



**Goal 12** - Ensure sustainable consumption and production patterns

**17** PARTNERSHIPS FOR THE GOALS



**Goal 17** - Strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development

Source:  
[The 17 Goals | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment)

## Sustainability targets

A set of targets accompanies Sunweb Group's sustainability strategy. Setting clear targets is crucial for measuring progress and taking necessary actions in time, prioritising efforts, and transparently communicating progress on objectives. The initial focus of these targets has been on Sunweb Group's environmental impact, due to the significant environmental footprint of travel in general. This focus creates social impact at our destinations by supporting certification efforts and driving positive change within the travel industry.

Overall, in 2024 we focused on good governance; the fundament of the company to embed sustainability within our company's strategy, aligned with our position the tourism industry and supply chains, and as part of our stakeholder management.

As part of our governance approach, we created an action plan for FY2025, based on the three pillars and 2030 goals of our strategy: Drive Environmental Change, Create Social Impact, and Act Responsibly. We will start working on companywide OKRs\* to create focus and to better align our goals and create shared value together with all departments.

For FY2025, we will set the Scope 3 baseline measurement as a key priority. Using this baseline, we can set a target for our Scope 3 emissions. It is our aim to validate this target and to reach net-zero by 2050.

\*OKRs: objectives and key results

### Strategy pillars

DRIVE ENVIRONMENTAL CHANGE	CREATE SOCIAL IMPACT	ACT RESPONSIBLY
TARGETS		
80% of contracted seats booked on an airline with Science Based Targets by 2030	Advocate to keep holidays affordable for every budget	Advocate for sustainability in our strategy, policies and operations
Achieve net-zero across Scope 1 and 2 in 2040 and Scope 3 in 2050	Increase accessibility of our websites and apps for the many, also for people with disabilities	Establish ourselves as a recognised sustainability promotor within the tourism industry
100% renewable energy in all our controlled offices by 2025	A healthy, diverse, equitable and inclusive work environment	Make the impact of our holidays transparent for our stakeholders – employees, partners and customers – to positively contribute towards becoming more sustainable
80% of our customers booked in a sustainably certified hotel in 2030	Encourage our key partners to pay their employees a fair living wage	
	Supporting initiatives that help local communities to have a positive impact on our destinations	



## Stakeholders

Sunweb Group's stakeholders are all groups or entities that have an interest in Sunweb Group. They are either affected by the actions of Sunweb Group or can influence the company. Stakeholders are internal or external to the organisation and may represent diverse interests and perspectives. This section highlights the most important ones.

Stakeholder group	Description	Manner of dialogue	Frequency
<b>Customers</b>	Customers are the reason Sunweb Group exists. As a service-oriented company, Sunweb Group keeps its consumers' interests in mind at every step of the way. This is done by constantly updating holiday experiences and offerings to fit their needs. Through our multiple brands, Sunweb Group is able to accommodate different types of demands, while offering dynamic packages tailored to a variety in pricing, luxury needs, comfort levels, and holiday experiences.	Websites, newsletters, social media, advertisements, annual sustainability report, phone, e-mail, chat and WhatsApp with Customer Services	Daily
<b>Employees</b>	<p>Sunweb Group lives and breathes through its employees. Although the booking platform is fully digital, we have over 500 people working hard to offer the best value-for-money product. From Customer Care promptly responding to and assisting with any customer request or complaint, to the People Organisation and Culture team making sure that employees' working conditions are enjoyable and stimulating.</p> <p>Sunweb Group can rely on a diverse team of people working collaboratively from seven offices around Europe and at destination. More information on employee well-being can be found in the <a href="#">Social section</a> of this report.</p>	Our internal SharePoint 'Flip', monthly Gatherings, newsletters, in-person in our offices, and much more	Daily
<b>Accommodation partners</b>	<p>Accommodation partners are the third component that make Sunweb Group's holiday services special. Sunweb Group's portfolio covers a wide range of destinations: Andorra, Austria, Bulgaria, Croatia, Egypt, France, Greece, Italy, Montenegro, Morocco, Norway, Portugal, Spain, Tunisia and Turkey.</p> <p>This would not be possible without our accommodation partners. From small privately-owned accommodations to apartments and luxury hotels, Sunweb Group's partners really do offer something for every taste. By improving the quality of their offerings – from sleeping arrangements to facilities – they allow Sunweb Group's portfolio to expand and improve. Some of our partners exclusively work with us; offering unique experiences to our customers.</p>	Meetings, digital correspondence, in-person visits, events, formal contract signings	Daily
<b>Airline &amp; bus partners</b>	Our airline and bus company partners operate the means of transportation Sunweb Group offers to its customers. Airlines and coach providers are core partners as they are responsible for our travellers getting to their destination safe, sound and ready to experience their holidays!	Meetings, digital correspondence, in-person visits, events, formal contract signings	Daily
<b>Agent &amp; Destination Management Companies (DMCs)</b>	Agents and DMCs are our local experts and often Sunweb Group's main contact with hoteliers at our destinations. They act as intermediaries with our customers and link travel agencies with accommodation suppliers at a specific destination. They understand the needs of both local suppliers and Sunweb Group.	Meetings, digital correspondence, in-person visits, formal contract signing	Daily



<b>Investors &amp; lenders</b>	Sunweb Group works with investors and lenders aiming for long-term partnerships. To achieve both parties' goals, joint commitment is important. Regular communications and reporting are key.	Bi-monthly board meeting, bi-monthly audit committee meetings, quarterly reporting, meetings, digital correspondence, visits	Weekly
<b>Auditor</b>	Our external auditor Deloitte plays a critical role in reviewing the accuracy and integrity of Sunweb Group's annual reporting processes.	Digital correspondence, meetings, formal audits	Monthly
<b>Regulatory entities</b>	Travel packages are amongst the most expensive products consumers buy online, often in combination with prepayments. This is why EU and national legislators and regulators keep a keen eye on this market. Particularly on consumer protection, marketing, privacy and financial services.	Relationship management, consultations, enforcement procedures, industry meeting	Ad hoc
<b>Industry associations</b>	Consumer protection and reputation go hand in hand. In this area we have interactions with lawmakers, (self-)regulators, consumer interest groups, industry associations and insolvency protection providers (SGR, ABTA, ATOL, APST, RGF*).	Working groups, meetings, digital correspondence, conferences	Quarterly
<b>Our destinations &amp; local communities</b>	Destinations and their local communities are crucial for making customers' holiday experiences enjoyable and unforgettable. Sunweb Group owes it to them to supply a sustainable type of tourism that positively impacts their territory. This can be exemplified by economic opportunities, cultural exchange and regenerative sustainable behaviours by customers.	Contact with local governments and representatives, visits to destinations	Quarterly
<b>The Environment</b>	Throughout the entire tourism value chain, it is imperative to prioritise the preservation of Planet Earth's interests. This commitment extends beyond ensuring the long-term viability of touristic operations to actively contributing to the global agenda of minimising humanity's impact on natural resources. Earth's diverse and captivating landscapes, ranging from pristine beaches to towering mountains, serve as the cornerstone of countless tourism experiences. Protecting these environments is essential to sustaining their appeal for holidaymakers and supporting the livelihoods of local communities.	Environmental impact assessments, sustainability reports	Annually

\*List of abbreviations:

- SGR: Stichting Garantiefonds Reisgelden (Travel Guarantee Fund) (Netherlands)
- ABTA: Association of British Travel Agents
- ATOL: Air Travel Organisers' Licensing (UK)
- APST: Association Professionnelle de Solidarité du Tourisme (Professional Association of Tourism Solidarity) (France)
- RGF: Rejsegarantifonden (Travel Guarantee Fund) (Denmark)





## Our Value Chain

As part of our sustainability strategy and alignment with the (voluntary) requirement to conduct a Double Materiality Assessment in ESG reporting, we conducted a comprehensive value chain mapping to better understand the key actors, dependencies and risks within our own operations as well as up- and downstream processes.

Sunweb Group utilised this value chain to assess the impacts, risks and opportunities (IROs) to determine the material topics for Sunweb Group. The value chain allows us to identify key partners and stakeholders, giving us a clearer understanding of our role within the broader travel ecosystem. We took 5 steps to understand and visualise our value chain.

### Step 1: Identifying value chain actors

To assess our sustainability impact, we mapped out the key stakeholders contributing to our value chain. They include:

- Suppliers and partners providing essential input such as transportation, accommodation and local services
- Service providers responsible for logistics, distribution and customer experiences
- Regulatory bodies and industry associations influencing standards and compliance

Each of these actors is categorised into tiers based on their proximity to our core business functions.

### Step 2: Indicate geographical context

Understanding the location of our value chain actors is crucial to identifying environmental and social factors that may affect operations. Some locations play a strategic role due to resource availability, sustainability practices or regulatory advantages. This context helps us make informed decisions on responsible sourcing and partnerships.

### Step 3: Understanding activities & sectors

Each stakeholder plays a role within specific sectors, such as hospitality, transportation, or tourism services. Mapping these activities allows us to assess how sustainability challenges like emissions and labour practices are distributed across our value chain.

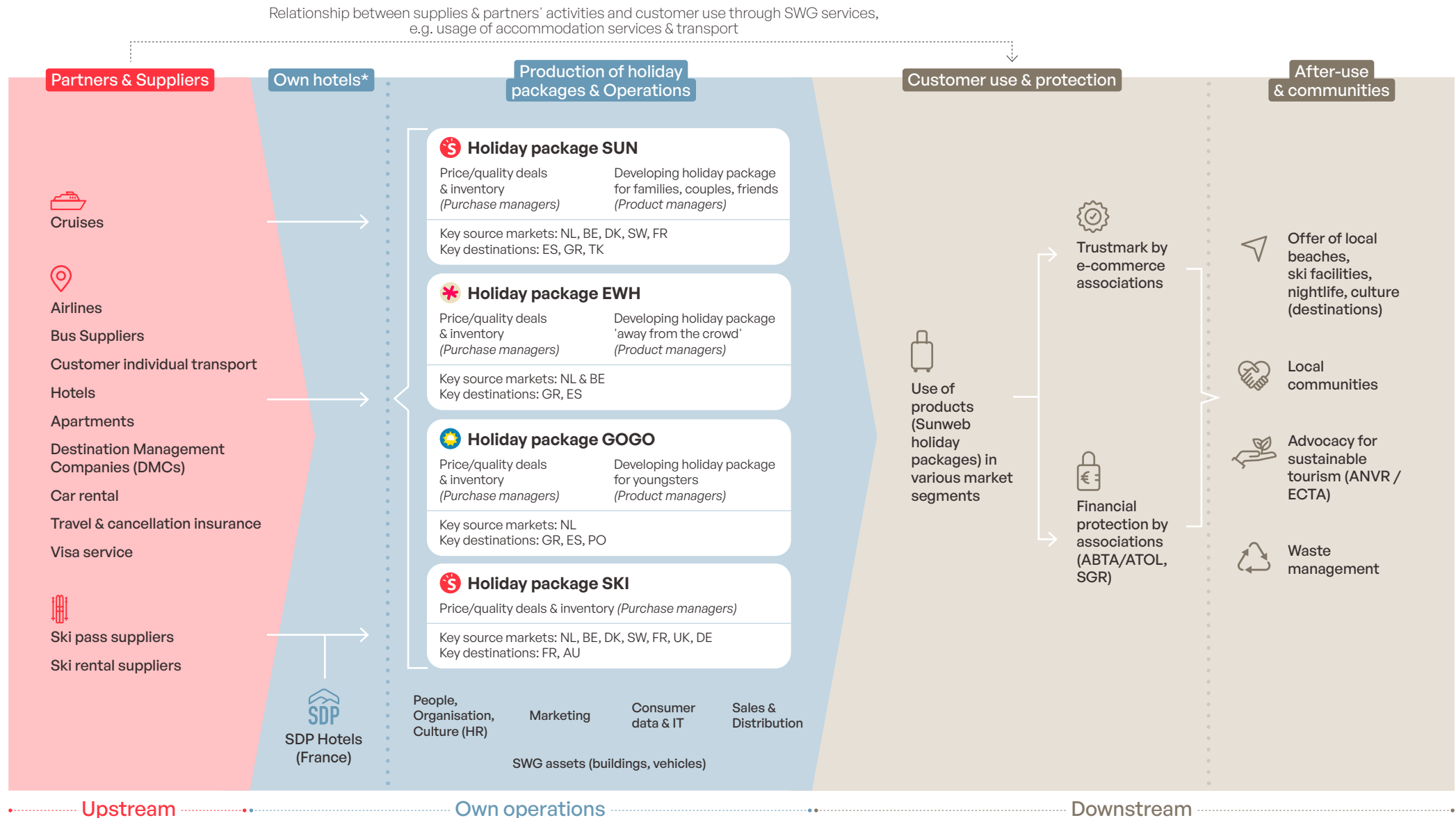
### Step 4: Dependency evaluation

We assess the level of reliance on specific actors or inputs and identify any high-dependency areas that pose risks. If a particular resource or service is critical, we have evaluated potential vulnerabilities such as supply disruptions, cost fluctuations, or environmental impact.

### Step 5: Revisiting the value chain map

The value chain map was evaluated with stakeholders to assess if it required adjustments.

## Value chain mapping of Sunweb Group



\*Own hotels and accommodations operationally controlled by SWG



## Double Materiality Assessment

A double materiality assessment (DMA) evaluates both the financial and non-financial impacts of a company's activities. For Sunweb Group, this means examining how ESG factors influence our financial performance while in reverse also investigating how Sunweb's operations affect the environment and society. A DMA helps identify significant impacts, risks and opportunities (IROs) from both perspectives and guides us in the topics we report on.

Progress was made throughout 2024 in taking our sustainability reporting to a higher plane. We did this by building on the double materiality assessment (DMA) conducted in 2022 and presented in our previous reports. This time, we also mapped our value chain (as described in the previous section), and conducted several impact, risk and opportunity (IRO) scoring and validation sessions.

Additionally, we secured the approval of the DMA process and outcomes with several stakeholders, including the Board of Directors and the Audit Committee.

## The DMA process

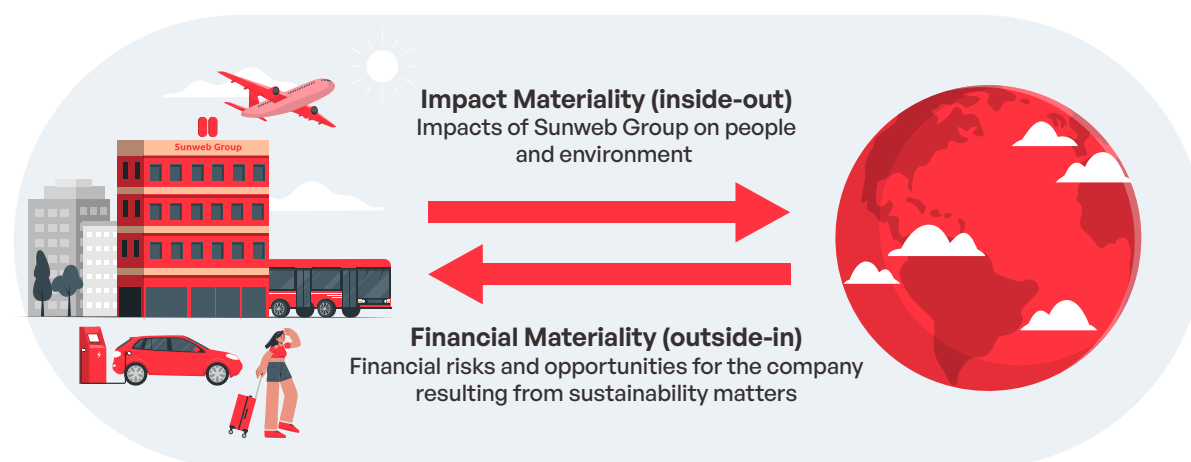
The process of our Double Materiality Assessment was as follows:

### Set scope, objectives and context

During this foundational step of Sunweb's DMA, we established a clear scope, objective and context to guide our sustainability strategy. Sunweb Group is committed to:

- Embedding sustainability across our operations
- Integrating ESG principles into our business strategy
- Enhancing transparency
- Assessing sustainability risks and opportunities
- Creating a positive impact across our value chain while strengthening our role as a responsible tour operator.

The DMA reporting scope includes all Sunweb Group entities. It covers core business activities such as tour operations, digital platforms, and partnerships with suppliers and service providers. To support this, a thorough value chain mapping has been conducted to identify key stakeholders, sustainability risks, and opportunities.



### **Determine definitions and thresholds**

We compiled a longlist of topics from various sources, including value chain assessments, industry reports, peer benchmarking, and media analysis. We incorporated CSRD framework themes and Sunweb Group's unique objectives. The longlist was refined through a structured exclusion process, ensuring transparency and consistency. The final selection reflected our priorities and operational context, distinguishing ESG issues from broader business topics.

### **Identify impacts, risks and opportunities (IROs)**

We transformed topics into impacts, risks, and opportunities (IROs) with insights from experts and stakeholders. We assessed geographic scope, core markets, and business relationships. This analysis helped us understand the links between risks, opportunities, dependencies, and Sunweb Group's strategic direction.

### **Assess impact materiality**

We assessed impact materiality in multi-hour sessions with stakeholders, using criteria focused on severity and likelihood. Severity was determined by scale (none to critical), scope (local to global), and irremediable character (very easy to non-remediable). Likelihood was measured as the probability of the impact occurring (0% to 100%).

### **Assess financial materiality**

We assessed financial materiality similarly to impact materiality but with different stakeholders. The assessment used two criteria: size (no impact to significant impact) and likelihood (probability of occurrence). The combination of these factors determined overall financial materiality. If a financial effect is already in financial statements, risks and opportunities (R&O) have a 100% likelihood.

### **Validate the findings with stakeholders**

The DMA outcomes were validated through a structured review with multiple stakeholders, including subject matter experts. The Audit Committee reviewed the methodology, scoring, and compliance with standards, ensuring accuracy and risk management. Finally, the Board of Directors validated the findings, considering strategic implications and approving the integration into decision-making.



## Outcome of DMA

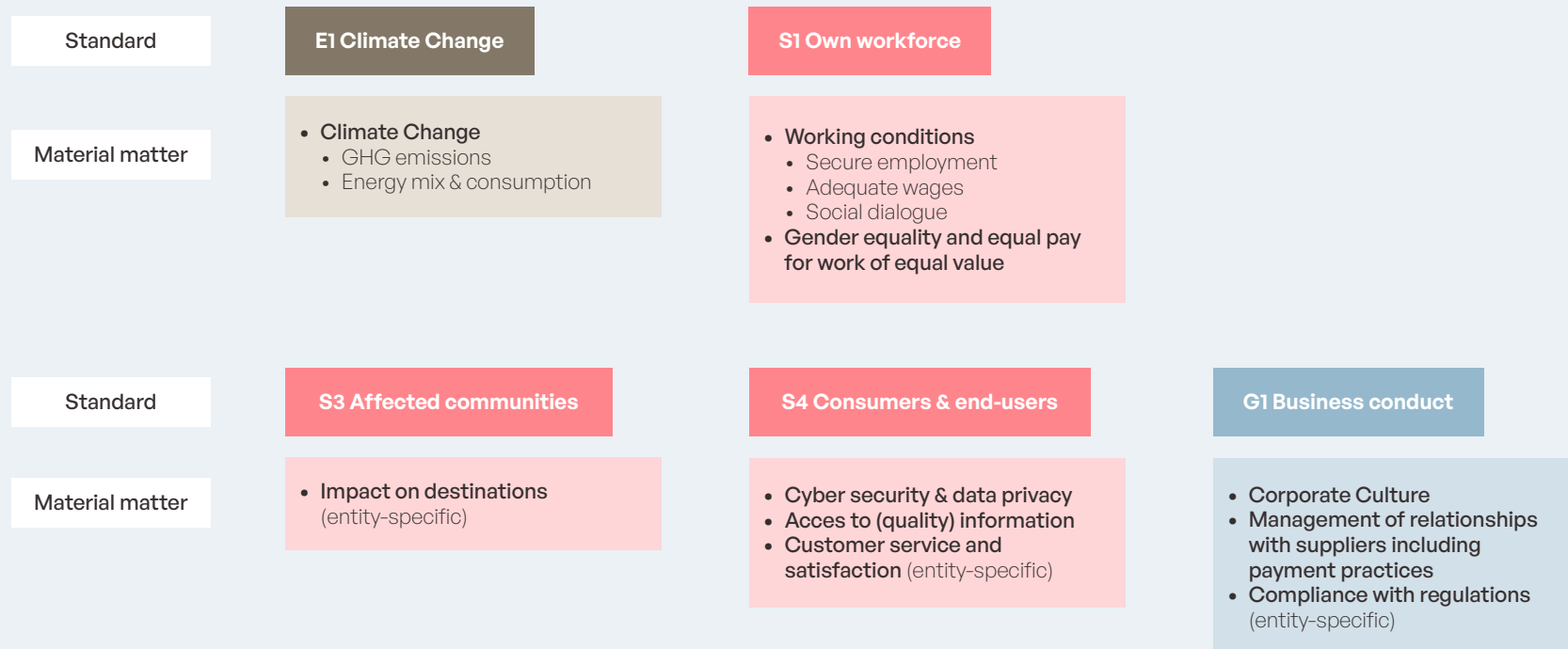
A topic is deemed material if the underlying IROs are scored above the set materiality threshold on either the financial or the impact materiality. We identified 13 material topics. Specific definitions of these topics are included in the appendix of this report, alongside an overview of last year's material topics and their link with current outcomes.

Sunweb Group and our stakeholders recognise that our material topics will change over time. With this being our first year conducting a DMA aligned with the ESRS, we

are committed to continuously refining our approach, especially given the evolving nature of the process and uncertainties surrounding the EU Omnibus package. This commitment involves adapting to new guidelines, integrating fresh insights, and applying lessons we learn along the way. Doing so, we can enhance our understanding of risks, opportunities and impacts, ensuring our sustainability assessments stay accurate and relevant in the long run.

The next part of this report will follow the outcome of our DMA by addressing the material topics per ESG pillar.

Several topics have been deemed non-material based on the predetermined thresholds. We do recognise that in some cases information about certain topics is important to mention in this Sustainability Report, regardless of this topic being material or not. If so, they are addressed a dedicated section: Other relevant topics.





## CSRD preparations & Sunweb's ESG Reporting journey

Sunweb Group remains committed to its sustainability strategy and transparency on all three ESG pillars as regulatory frameworks evolve. With reference to the recent Omnibus Regulation proposal presented by the European Commission, our company is expected no longer to be scope of the CSRD. However, we recognise that environmental, social and governance considerations are essential for our long-term success, stakeholder trust, and the broader travel industry's sustainable transformation.

Despite the change in regulatory obligations, we will continue to voluntarily report on ESG matters to our stakeholders, currently exploring the voluntary VSME standards of the European Union. The exploration of a new framework is done in close collaboration with our sector partners and the ANVR. Our commitment ensures that we provide stakeholders (customers, employees, investors and partners) with clear insights into our sustainability performance, goals, and impact.

Though CSRD might no longer apply to us, our dedication to sustainability remains unwavering, demonstrating that ESG is not just a compliance requirement but a core part of our identity and long-term vision.



# Environmental

## Drive Environmental Change

As part of our commitment to sustainability, we recognise the role we play in shaping environmental outcomes and driving climate change. In line with our strategy 'Drive Environmental Change', our approach focuses on the outcomes of our double materiality assessment, aiming to reduce greenhouse gas (GHG) emissions and optimise energy consumption.

By addressing these key material topics, we aim to mitigate our environmental footprint while contributing to global efforts for a cleaner, more sustainable future.

### Material topics:

- GHG emissions (E1)
- Energy consumption and mix (E1)

\*Lenzen, Manfred & Sun, Ya-Yen & Faturay, Futu & Ting, YuanPeng & Geschke, Arne & Malik, Arunima. (2018). The carbon footprint of global tourism. Nature Climate Change.

## E1 Climate Change

### Material topic: GHG Emissions

### Environmental impact of the tourism industry

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

### Our business' CO2 footprint

We use the Greenhouse Gas Protocol, a private sector corporate accounting and reporting standard, as a basis for carbon accounting. It divides emissions into three categories: Scope 1, Scope 2 and Scope 3 emissions.

- Scope 1: direct greenhouse gas (GHG) emissions from sources owned or controlled by the reporting entity (in this case, Sunweb Group).
- Scope 2: indirect GHG emissions associated with the production of electricity, heat, or steam purchased by the reporting entity.

\*\*WBCSD/WRI, 2004. Greenhouse Gas Protocol: a Corporate Accounting and Reporting Standard Greenhouse Gas Protocol: a Corporate Accounting and Reporting Standard

- Scope 3: all other indirect emissions, such as emissions associated with the extraction and production of purchased materials, fuels and services, including transport in vehicles not owned or controlled by the reporting entity, outsourced activities, waste disposal, etc.\*\* This includes, for example, the GHG emissions that are emitted by the airlines or vehicles that bring our holidaymakers to their destinations.

Sunweb Group is an asset-light company; we work with partners to create our holidays without owning, for example, hotels or airplanes. Our Scope 1 and 2 emissions are therefore minimal. Most of Sunweb Group's environmental footprint comes from Scope 3, and from this category, most emissions come from 'use of sold products': our holidays including different forms of transportation.



## Greenhouse gas (GHG) emissions in financial year 2024

Data point	Tonnes of CO <sub>2</sub> e 2024***	Tonnes of CO <sub>2</sub> e 2023***
<b>Direct GHG emissions (Scope 1)</b>		
Total Scope 1 GHG emissions	205	144
<b>Indirect GHG emissions (Scope 2)</b>	720	777
Energy from renewable sources	525,602 kWh	
Energy from non-renewable energy sources	3,809,321 kWh	
Energy production from renewable resources (in KWh)	60,558 kWh (of solar energy)	
<b>Indirect GHG emissions (Scope 3)</b>		
Waste (cat. 5)	581	
Business travel (cat. 6)	1,372	
Employee commuting (cat. 7)	203	
Use of sold products (cat. 11)	752,771	
<b>Total Scope 3 GHG emissions</b>	<b>754,927</b>	<b>657,107</b>
<b>Total Scope 1, 2 and 3 emissions</b>	<b>755,852</b>	<b>658,029</b>

\*\*\*CO<sub>2</sub> equivalent

We observe an increase in our Scope 1 emissions compared to last year. This rise is primarily due to improvements in the completeness of our emissions reporting rather than a significant change in operational emissions. In 2023, our Scope 1 data did not include emissions from rental vehicles used by our tour leaders at winter destinations, nor did it account for the energy consumption of electric vehicles. In 2024, both of these sources were incorporated into our calculations, resulting in a more comprehensive and accurate representation of our direct emissions.



## Reducing Scope 1 and 2 emissions

While over 99% of Sunweb Group's emissions fall within Scope 3, it remains imperative to address Scope 1 and 2 emissions, as we can control these more directly. We have set three targets associated with Scope 1 and 2 emissions:

Target: **Achieving net-zero across Scope 1 and 2 in 2040 and Scope 3 in 2050**

Target: **100% renewable energy in all our controlled offices by 2025**

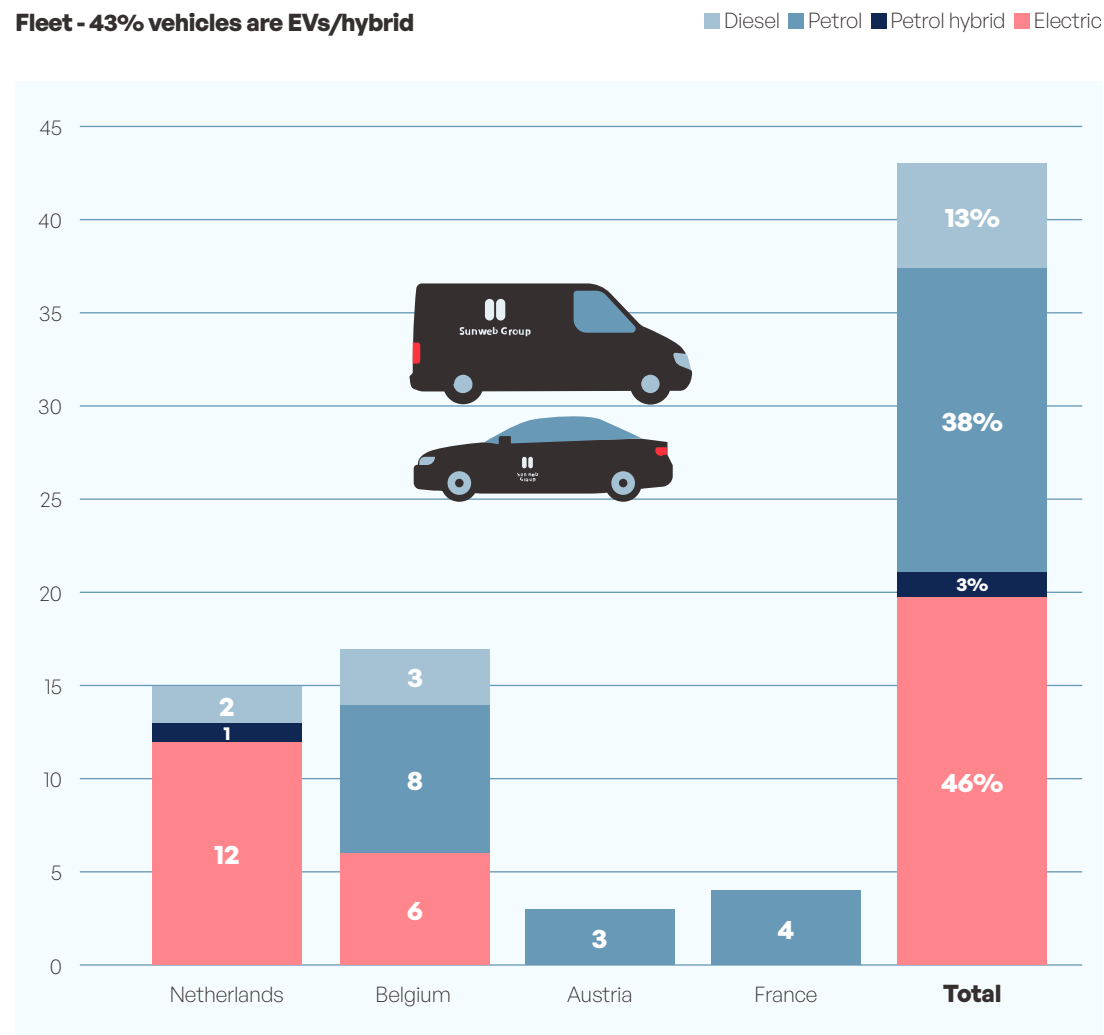
## Employee commuting

Part of employee commuting falls under Scope 1 or 2 (use of lease cars or vehicles owned by Sunweb Group), part under Scope 3 (such as commuting by public transport or own transportation of our employees).

At Sunweb Group, we fully reimburse employees' commute by public transport in most countries. As a digital company, we are open to working from home (50% of an employee's working time), we use online meetings where possible to avoid business travel and commuting, and we try to avoid peak travel hours when planning meetings that require physical attendance.

Sunweb Group is currently transitioning its fleet to electric vehicles (EVs). With 39 cars in our inventory, we prioritise replacing them with electric alternatives when feasible, either upon reaching the end of their lifecycle or during lease contract renewals.

## Fleet - 43% vehicles are EVs/hybrid



\*Total fleet overview as of 31 October 2024, noting the absence of owned or leased vehicles in certain operating countries, such as Spain, Sweden, and Denmark.



## Our offices

In addition to our focus on the energy sources used for employee mobility, we are minimising the environmental impact of our office spaces. Implementing energy-efficient lighting, sensor technology, and sustainable heating and cooling systems are among the measures we have undertaken to reduce our ecological footprint.

Notably, our biggest office, in Rotterdam, features a state-of-the-art cold and heat storage system, and the office restaurant has a green roof. In collaboration with neighbouring offices, we share 336 solar panels; our allocation being 56.1%. The annual figure for these solar panels was 61 MWh in 2024, which represents 20% of the Rotterdam office's annual energy consumption.

Additionally, we choose to obtain renewable energy sources when we renew office leases, where feasible. During office renovations we prioritise integrating energy saving solutions and other sustainability initiatives.

## Reducing Scope 3 emissions

Most of Sunweb Group's environmental footprint comes from Scope 3, and from this category, most emissions come from purchased flights. There are two things we focused on to lower emissions. We encouraged our airline partners to set their own greenhouse gas reduction targets aligned with the Science Based Targets initiative (SBTi) and we invested in sustainable aviation fuel (SAF). Besides, we are actively involved in advocating the sustainability of the airline industry.

## Impact of flights

To many of our key destinations, there are currently no alternatives to flying. As we do not own or operate our own aircraft, we are in ongoing conversations with our partners on topics like fleet renewal, waste, weight and noise reduction and route efficiency.

We have established engagement targets for our airline partners, specifically encouraging them to set their own greenhouse gas reduction targets through the Science Based Targets initiative (SBTi). This collaborative effort ensures that our partners align their sustainability goals with scientific benchmarks, contributing to global efforts to mitigate climate change. Through such proactive engagement and initiatives, we strive to foster a more sustainable aviation industry and minimise our overall environmental impact.

In 2024, 69% of our seats were booked with airlines that are aligned with the SBTi. Our target is to have 80% of contracted seats booked on an airline that is committed to Science Based Targets by 2030.

## Science Based Targets initiative

The Science Based Targets initiative (SBTi) is a global effort led by the CDP (previously known as the Carbon Disclosure Project), the United Nations Global Compact, World Resources Institute and the World Wide Fund for Nature. It aims to encourage and assist companies in setting greenhouse gas emission reduction targets that are in line with the scientific consensus on limiting global warming to well below 2 degrees Celsius above preindustrial levels, as outlined in the Paris Agreement. To be considered 'science-based', targets have to meet strict criteria developed by the initiative, ensuring they are ambitious, transparent, and grounded in climate science. Targets approved by the SBTi are called Science Based Targets (SBT). For more information, visit <https://sciencebasedtargets.org/>.



## Sustainable Aviation Fuel

We believe that 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 CO<sub>2</sub> in its life cycle compared to using fossil kerosine\*.

In 2022, Sunweb Group started investing in SAF with our airline partner Transavia, through a mutual sustainability fund to reduce emissions from our holiday offerings, initially through a partnership with SAF producer Neste. In 2024, not only did we purchase SAF through our partner Transavia, but we also bought SAF through our partner Brussels Airlines. This approach aims to encourage and empower our partners to accelerate their commitment to SAF. From 2025 onwards the EU mandates aviation fuel suppliers to include a 2% SAF blend in all flights departing from the EU starting January 1, 2025.

Through our SAF partnership with Transavia, we procured 256,250 litres of SAF during the financial year 2024, directly resulting in 602mT CO<sub>2</sub> GHG emissions reduction. The fuel is produced from sustainably sourced renewable waste and residue raw materials such as used cooking oil.

Through our partnership with Brussels Airlines, we procured 248,900 litres of SAF in the financial year 2024. The Lufthansa Group is taking care of central SAF purchasing, and our SAF purchase was one of the biggest volume deals for Brussels Airlines and the Lufthansa Group, according to Dorothea von Boxberg, CEO of Brussels Airlines.

Although these SAF purchases currently only represent a small percentage of our annual fuel usage, it is an important step towards making flying more sustainable, alongside other innovations like fleet renewal. As a holiday provider without our own aircraft, by investing in SAF, we aim to show 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



“

Transavia is aware of the pressing need to tackle climate change and of our role in this global issue as a part of the aviation industry. We have set ambitious targets to minimise our environmental impact, aiming for a 30% reduction in emissions intensity (CO2 per passenger per kilometre) by 2030 and striving for net-zero emissions by 2050. Our approach is two-fold:

Firstly, for impact in the short-medium term, we are scaling up our use of SAF, completely replacing our fleet (from Boeing to the quieter and more fuel-efficient Airbus Neo's), as well as making continuous marginal operational changes to improve fuel efficiency.

Secondly, we are investing time, money and effort in new innovations which we expect to have a huge impact on reducing our long-term environmental footprint. We do this by working with partners in the Dutch eco-system to research, test and develop new technologies. For example: developing zero-emission aviation aircraft, and scaling-up new carbon capture technologies.

We are very happy that Sunweb supports us in our sustainability efforts and have no doubt that our collaboration with Sunweb Group will play an important role in reaching our goals.

”



**Oliver Newton**

Sustainability & Innovation Lead,  
Transavia



## Sustainable partner ecosystem

We collaborate closely with our partners to improve sustainability across our value chain. We aim to create a more sustainable partner ecosystem, focusing not only on transportation but also on accommodations, and even on smaller partners such as office suppliers and catering services.

## Transparency on accommodations

Recently, we introduced a sustainability search filter on our Sunweb and Eliza websites. This filter allows holidaymakers to quickly and easily find accommodations that are certified by reputable and independent sustainability organisations so they can make well-informed and more responsible choices when booking their accommodations.

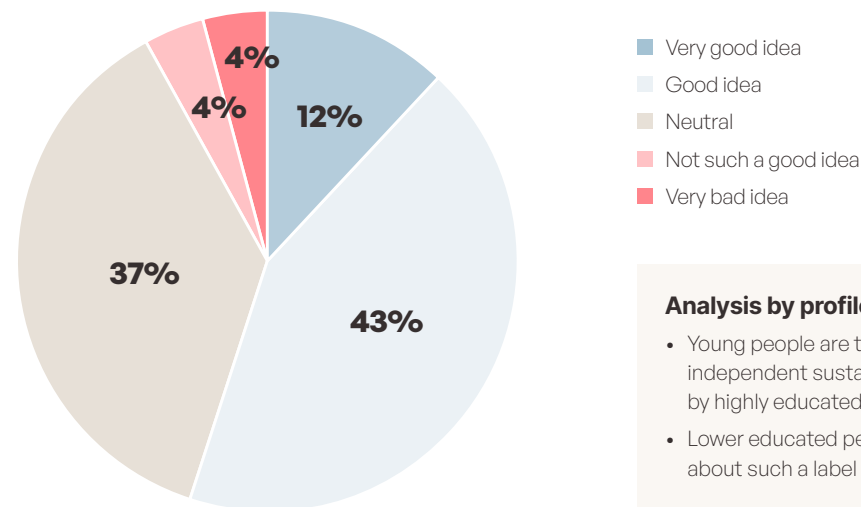
With the sustainability filter, we want to make sustainable options more transparent and accessible to our customers. Our goal is clear: by 2030, we want to have 80% of our customers booked in sustainably certified accommodations, as we want to guide our customers in making more responsible choices. We believe this is essential for the future of the travel industry.

Research has revealed that the majority of Dutch holidaymakers believes that an independent sustainability certificate, which indicated the sustainability of a holiday, would be a good idea<sup>4</sup>.

<sup>4</sup> Source: The attitude of Dutch holidaymakers regarding sustainability, Trends & Tourism, July 2023

## Attitude towards independent sustainability label

A majority of holidaymakers would find an independent sustainability label that indicates how sustainable a holiday is a good idea.



### Analysis by profile characteristics

- Young people are the most positive about an independent sustainability label (61%), followed by highly educated people (59%).
- Lower educated people are relatively neutral about such a label (44%).

**Question:** What do you think if there was an independent sustainability label that indicates how sustainable a holiday is?

**Basis:** Dutch people who plan to go on vacation next year | n = 2,013



Research: The attitude of Dutch holidaymakers towards sustainability | Sunweb



Our new search feature gives customers more insight into the impact of their choices when booking a holiday. Currently, around 10% of accommodations in our offering has a sustainability certification. Certified accommodations meet strict criteria around waste, water and energy management, biodiversity and working conditions.

### Accommodation sustainability certification

Certification is always conducted by independent organisations. All accommodations included in the filter have been assessed by independent certifying bodies in tourism such as Green Key, Travelife and Ecotars that verify whether an accommodation meets strict sustainability standards. A third-party audit is always part of the certification process.

The certifying organisations we partner with are either accredited by GSTC\* or committed to achieving an accreditation issued by relevant national accreditation bodies before the end of 2026. We follow ABTA List guidelines to select certifying organisations that meet these criteria<sup>5</sup>.

Thanks to a real-time connection with the BeCause platform – which manages certification data for businesses and keeps them up to date – our certification information is current and reliable.

Sunweb Group shows the certification of accommodations in her offering. By working with carefully selected partners at key European destinations, we aim to affect sustainability policies at these locations.

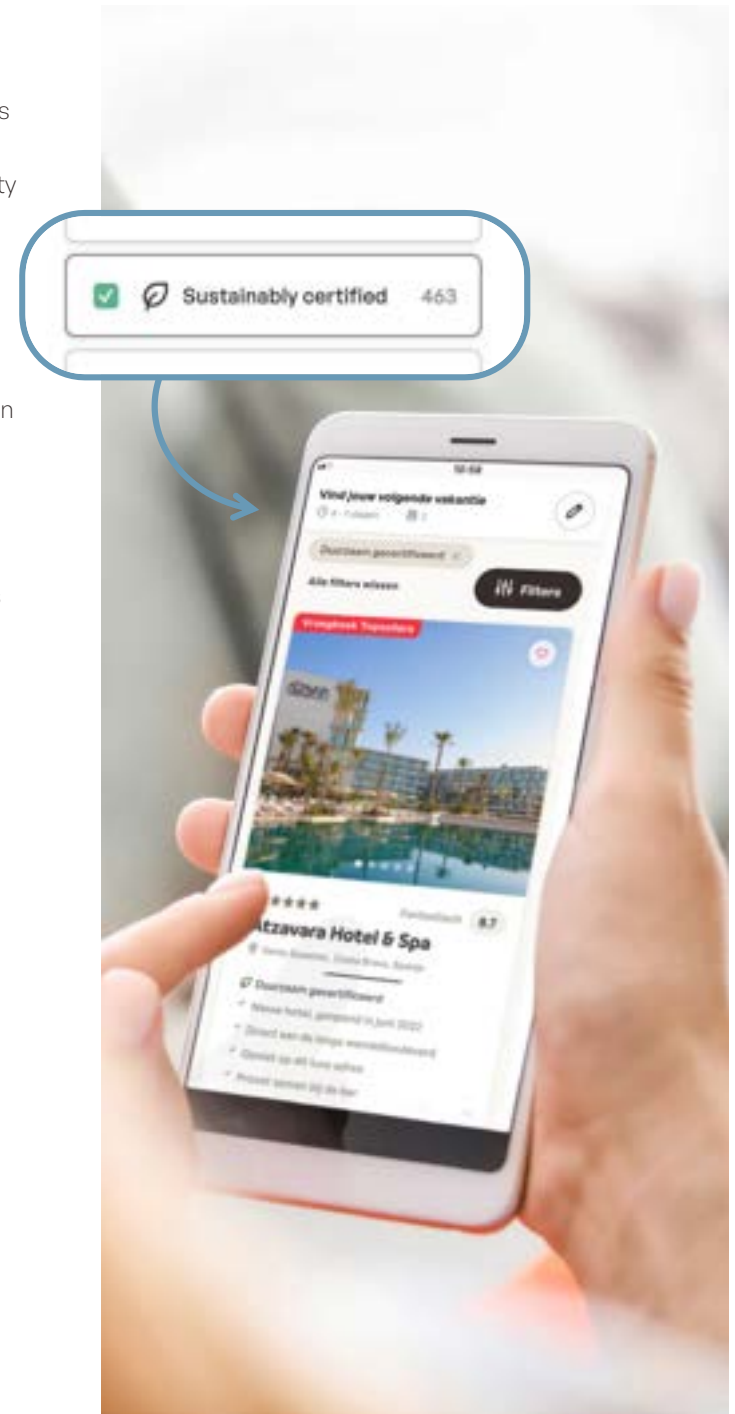
Sustainability also plays a key role in our long-term partnerships with hotels. One recent example is Sunweb managed SDP Résidence Club Margot in Superdévoluy (France), which obtained their first Green Key certification in November 2024.

Additionally, we offer training sessions to our partners, in collaboration with our new preferred partner Green Key, encouraging partners to obtain sustainability certifications for their accommodations.

**Target: By 2030, 80% of our customers books in sustainably certified accommodations**

<sup>5</sup> Source: ABTA/ANVR list of accommodation sustainability certification schemes and labels, ABTA

\* Global Tourism Sustainability Council (GSTC)



## Introducing more environmentally friendly holiday alternatives

Another approach to reducing the environmental impact of transportation is to incorporate alternative, less polluting means of transportation. We have unfortunately had to discontinue our train holiday packages because of operational complexity with train ticket bookings. However, we continue to monitor developments in train ticketing systems, the expansion of rail networks and improvement of train frequency.

### Bus and car holidays

Another way of making holiday transport more climate-friendly is choosing to travel by bus or car. Buses consistently outperform planes when it comes to CO2 emissions per passenger kilometre. Going on holiday by car is almost always more sustainable than flying. Looking at CO2 emissions per passenger kilometre alone, a car holiday is more sustainable than going by plane when you travel with two or more people\*. Emissions per person go down even further when sharing the car with additional passengers, such as families traveling together.

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 holidays to our winter destinations, with ski trips making up 28% of our total number of passengers. Out of those ski trips, 78% of passengers opt to use their own transportation, 14% of passengers go by bus and 8% by plane. Sunweb Group is one of the biggest bus-ski tour operators in Europe. Over the coming years, we aim to make private and bus transport an even more attractive option for our winter holidaymakers.

\*BEIS/Defra Greenhouse Gas Conversion Factors 2019



### Material topic: Energy mix & consumption

Our energy mix and consumption are closely related to our Scope 1 and 2 emissions as discussed in the previous chapter.

In this section, we want to specifically highlight the efforts that we are making in our Sunweb-operated hotels, known to as SDP Hotels. These hotels are operated by Sunweb through multi-year contracts. Unlike the other hotels we offer in our holiday packages, we often have more control when it comes to creating impact with the SDP hotels. We also have dedicated employees in France for the operation of approximately 25 accommodations, including 10 hotels.

At the end of 2024, Hôtel Margot in Superdévoluy became the first SDP hotel to earn the Green Key certification, valid until 31 December 2025. We will undergo another audit in 2025 to maintain this certification for an additional three years. Significant efforts were made to establish the necessary processes and documentation for this initial certification. We now aim to utilise this information to boost certification of more accommodations.

#### Key Initiatives Implemented:

- **Waste management:**  
Reduction of waste, elimination of single-use plastics, and separation of waste in bars and restaurants (implemented or planned for all SDP hotels by the end of winter season 2024).
- **Eco-friendly cleaning products:**  
Exclusive use of ECOLABEL cleaning products, and proper storage.
- **Energy and water consumption:**  
Reduction efforts through replacement and installation of efficient materials (like LED lighting, dual-flush toilet buttons, economical showerheads and taps).
- **Sustainable communication:**  
Enhanced communication with guests during their stay, and staff during their contracts, including reminders of new processes and display reminders.
- **Policy & goals:**  
Continuous adherence to new sustainability policies and goals.

We are proud of the great work by our SDP team and will focus on getting more SDP hotels Green Key certified in the coming years.







# Social

## Create Social Impact

At Sunweb Group, our people are at the heart of everything we do. We believe that a healthy, inclusive and motivating work environment is essential for both individual success and the sustainable growth of our organisation. In 2024, we strengthened our commitment with a series of strategic initiatives that support, inspire, and provide a secure foundation for our employees to collectively build a sustainable future.

In our pursuit of sustainability, we recognise that the S pillar of ESG, our social responsibility, is a cornerstone of our sustainability strategy. In line with our mission to

'Create Social Impact' we emphasise our commitment to fostering a positive impact on society through the lens of our material topics. We believe that a sustainable future is about environmental stewardship as well as caring for the well-being of our employees, other stakeholders, and the communities we serve and operate in.

Our social initiatives are designed to promote equity, diversity and inclusion, ensuring that every individual can thrive. From supporting local communities to enhancing workplace culture, we strive to create an environment where everyone feels valued and empowered.

### Material topics:

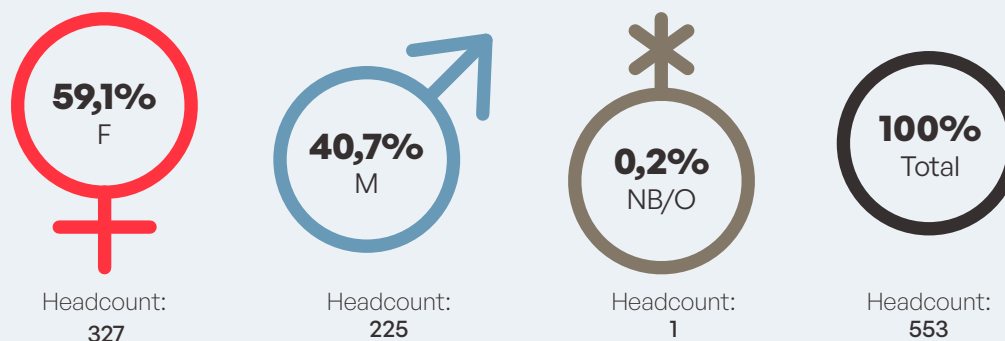
- Working conditions (S1)
  - Secure Employment
  - Adequate Wages
  - Social Dialogue
- Gender Equality and Equal Pay for Work of Equal Value (S1)
- Impact on destinations (S3)
- Cyber security & data privacy (S4)
- Access to quality information (S4)
- Customer service and satisfaction (S4)



## Key employment figures



### Gendersplit\*\* (as per 31 October 2024)



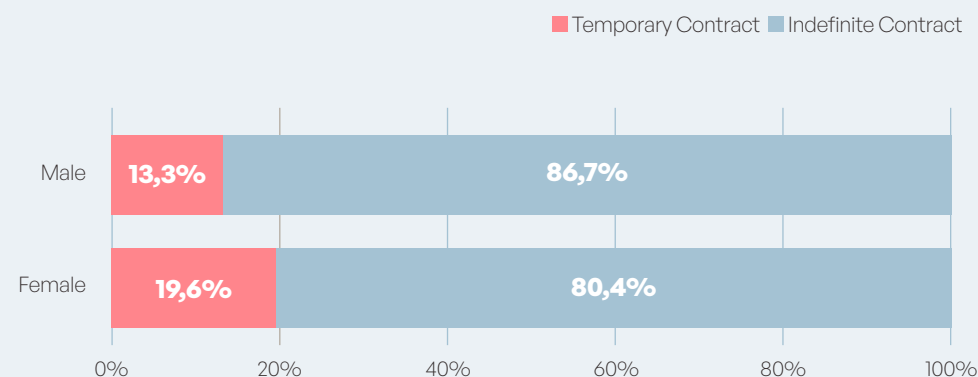
### Type of contract – Gendersplit \*\*\*

The non-binary employee is added to the smallest group, in this case the male group, to not give any details about their contract details.

	Temporary contract	Indefinite contract	Total
Female	64	263	327
Male	30	196	226
Total	94	459	553

	Temporary contract	Indefinite contract	Total
Female	19,6%	80,4%	100%
Male	13,3%	86,7%	100%

### Male - Female division per type of Contract %



\*including guides on contract, working students and SDP office and maintenance employees

\*\*based on internal employees

\*\*\* Note: the non-binary employee was added to the smallest group, in this case 'Male', to avoid contract information becoming public.

### Type of Employment – Gendersplit \*\*\*

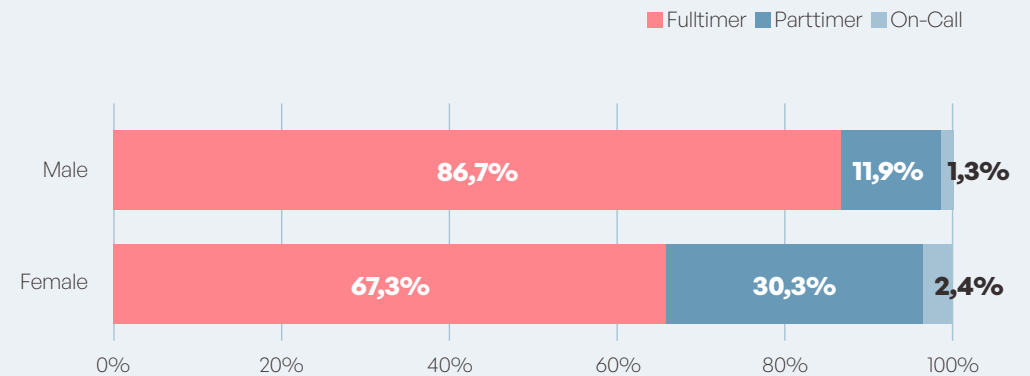
The non-binary employee is added to the smallest group, in this case the male group, to not give any details about their contract details.

	Fulltime	Parttime	On-Call	Total
Female	220	99	8	327
Male	196	27	3	226
Total	416	126	11	553

	Fulltime	Parttime	On-Call
Female	67,3%	30,3%	2,4%
Male	86,7%	11,9%	1,3%

### Male - Female division per type of Employment %



### eNPS

Went up from +3 in Nov 2023 to +24 in Nov 2024

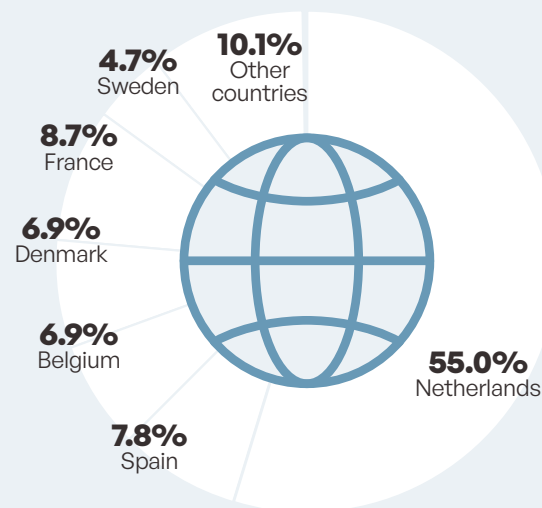
**+3** → **+24**  
November 2023 to November 2024

### Turnover rate Sunweb Group\*\*

(including customer care, based on internal employees)

**26.2%** → **22.8%**  
November 2023 to November 2024

### Country of birth percentages\*\*



Country of birth	Percentage	Headcount
The Netherlands	55%	304
France	8.7%	48
Spain	7.8%	43
Denmark	7.8%	38
Belgium	6.9%	38
Sweden	4.7%	26
Other	10.1%	56
Total		553

\*including guides on contract, working students and SDP office and maintenance employees

\*\*based on internal employees

\*\*\* Note: the non-binary employee was added to the smallest group, in this case 'Male', to avoid contract information becoming public.

## S1: Own workforce

*Material topic: Working conditions*

### Secure Employment

A safe and stable workplace is a key pillar of our sustainability strategy. We invest in long-term employment relationships by offering permanent contracts and clear career paths for our office staff and tour leaders. By safeguarding fair and consistent employment conditions in line with national and international regulations, we ensure that our employees always know what to expect.

Our commitment is further demonstrated through modern, ergonomically designed workplaces which incorporate sustainable features to create a safe and supportive environment, both physically and mentally. Through proactive measures and continuous improvements, we ensure a sustainable and supportive work environment for all employees.

### Adequate wages

Sunweb Group ensures that employees in operating countries earn above minimum wage, with a salary benchmark confirming market competitiveness. Wage differences are openly shared on internal platforms, ensuring transparency and trust among employees. We actively engage with our employees through various feedback mechanisms to ensure their voices are being heard and their concerns are addressed. Bi-weekly surveys among our staff provide valuable insights into increasing employee satisfaction and areas for further improvement.

### Social Dialogue

We believe that social dialogue can boost morale and overall workplace satisfaction, leading to higher productivity. Sunweb Group has effective systems in place to foster communication and social interaction between our employees. By prioritising social dialogue from within and between hubs, gathering feedback from international colleagues, we strive to enhance satisfaction and inclusivity, including for our employees outside our headquarters. We organise monthly meetings - “the Pause” - in which we give our colleagues important updates on our key figures. We communicate on a daily basis through our Fast Forward Forum. We openly invite colleagues for feedback sessions with our CEO.

Open communication and collaboration are also key to our sustainability efforts. Our annual Sustainability Days serves as a vital platform for social dialogue, where employees from all hub offices engage in interactive (online) sessions, workshops and panel

discussions. This day fosters an environment in which ideas, knowledge, and insights are shared openly, ensuring that diverse perspectives contribute to our company's future.

### Works Council

Our Works Council plays a crucial role in promoting social dialogue and ensuring employee well-being. The council actively collaborates with management ensuring that at all employees have a voice in decision-making processes. By fostering a culture of transparency and inclusivity, the Works Council helps create a supportive work environment that aligns with our sustainability goals. Their efforts contribute to both the environmental and social aspects of our sustainability strategy.



As Sunweb's Works Council, our commitment to social dialogue is fundamental to our sustainability efforts. By fostering open communication and collaboration between employees and leadership, we ensure that everyone's voice is heard. This inclusive approach helps us address concerns, implement fair practices, and create a positive

work environment. By doing so we are building a stronger, more sustainable company.



**Vanessa den Hertog**

Chair of the Works Council



*Material topic: Gender equality & equal pay for work of equal value*

### **Gender equality and equal pay for work of equal value**

At Sunweb Group, we are dedicated to providing fair and competitive wages that truly reflect the value of every role. We use internationally recognised Mercer data as our benchmark, ensuring that our salary structures are transparent and market aligned.

This commitment to 'equal pay for equal work' guarantees that no gender-based pay differences exist, fostering a culture of fairness and trust where every employee is valued based solely on their role and performance. Strengthening gender equality and equal pay policies can enhance employee loyalty, so our commitment to equal pay practices boosts employee motivation and creates clear career growth paths for all our people.

The gender pay gap of Sunweb Group, defined as the difference of the average monthly pay levels between internal female and male employees, expressed as percentage of the average monthly pay level of male employees, has been reduced in 2024 to 27.12%. We see positive trend compared to last year, when our gender pay gap was 34.92%. This metric is calculated excluding our board.

### **Other relevant topics**

After conducting our Double Materiality Analysis, several important topics to our business have not met the threshold for materiality in line with the ESRS. This, however, does not mean that these topics are not relevant to our organisation as they are often part of our license to operate. In this section, we highlight several of them:

- Diversity, equity, inclusion & belonging
- Empowering leadership
- Wellbeing initiatives – Empower

- Sustainability week & education
- LinkedIn learning
- Workations
- Diversity in our sustainability communication

### *Diversity, Equity, Inclusion & Belonging (DEIB)*

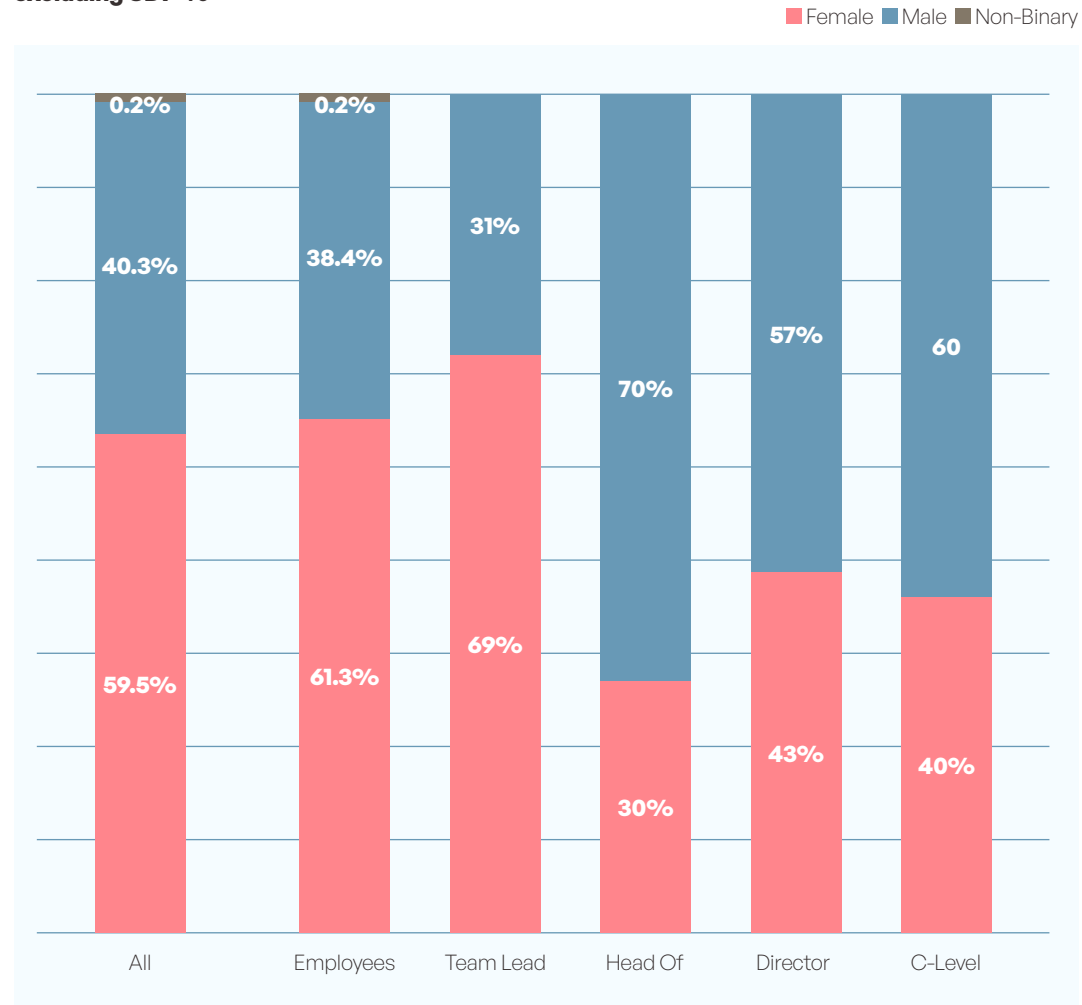
Creating an inclusive culture is indispensable for innovation and growth. With our DEIB Core Team and the commitment of our DEIB Ambassadors, we continuously strive to foster an environment where everyone feels heard, respected, and empowered. We integrate DEIB principles into all our processes—from inclusive recruitment strategies with revised job postings and structured interviews to fair performance and salary evaluations without discrimination. Our efforts are measured using Peakon, where our current satisfaction score for our DEIB initiatives stands at +13 (with a target of +23), and 33% of our (sub)top management is now female—an important interim milestone.



## Diversity Metrics

Gender distribution in numbers & percentages at top management level

### Gender division per function of internal employees, excluding SDP %

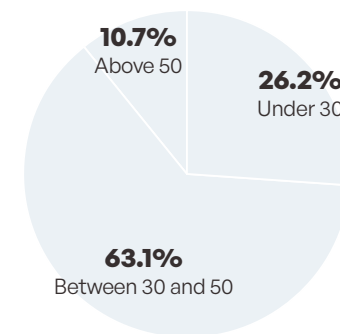


### The distribution of employees by age group\*\*

With our diverse team of over 500 people in multiple office locations across Europe (Austria, Belgium, Denmark, France, Netherlands, Spain, Sweden, Switzerland), and our operational teams and guides at our destinations, we work together to create lasting memories for our customers. The average age is 36.4.

Age	Percentage	Headcount
Under 30	26,2%	145
Between 30 and 50	63,1%	349
Above 50	10,7%	59
<b>Total</b>	<b>100%</b>	<b>553</b>

### Age distribution\*\*



### Average age of all employees\*



## Empowering Leadership

Strong leadership is the backbone of a healthy organisational culture. In June 2023, we launched the pilot phase of our Empowering Leadership programme, in which nearly 90 leaders enhanced their skills through dynamic learning sessions, tailored classroom settings, and international offsites, including intensive leadership bootcamps.

Building on this success, we expanded the programme in 2024. As the first cohort neared the end of their journey in July, a new wave of emerging leaders began their development in February. This continuous investment in leadership underscores our unwavering commitment to nurturing a culture of growth and excellence across the organisation.

## Wellbeing Initiatives – Empower

We believe that employee wellbeing is essential for both personal fulfilment and long-term company success. On 14 November 2024, we launched our Wellbeing Initiative 'Focus on You' in partnership with Empower.nl and supported by the Dutch MDIEU subsidy programme. With this two-year structured programme, we invest in company-wide activities that include quarterly themes, masterclasses, inspirational speakers, and challenges.

At team level, managers can organise tailored workshops supported by a dedicated wellbeing budget for each



office. Local wellbeing ambassadors in every country ensure that each employee has access to the necessary resources, including individual budgets for personal development activities such as sleep training, exercise, or confidence-building workshops.

## Sustainability week & education

At the start of the 2024 financial year, we launched the Sunweb Group Sustainability Week. Led by a dedicated team of 22 colleagues from all hub offices and our Head of Sustainability, this week provided our employees with a deeper understanding of sustainability through the introduction of our sustainability strategy and enlightening lectures by internal and external industry experts to create engagement.

Online and offline sessions covered topics ranging from the fundamental science behind climate change and its implications for tourism to insights from our partners at sun and ski destinations on social and environmental issues. A total of 35 activities for employees included discussions on the future of air travel and opportunities for hands-on involvement, challenges and gamification.

Developing and launching our sustainability strategy across our European offices, colleagues volunteered for various social and environmental initiatives, while we also prioritised wellbeing through yoga, a vegetarian day and personal challenges.



We did not forget about Governance; a quiz was organised about governance topics and a lecture on cybersecurity was part of this programme. In Rotterdam, about 60 colleagues volunteered in a nearby care home and a similar number of employees in our Denmark and Belgium offices did a street clean-up.

Besides this week-long event, we regularly communicate with our employees about our strategy and sustainability overall. For instance through our monthly company-wide Gatherings, our internal employee platform, via newsletters and more. Successful volunteering activities like street clean-ups were repeated twice.

In 2025, we will continue our team education on a regular basis by organising quarterly updates on sustainability.

## LinkedIn learning

Continuous learning is key to personal and professional growth. Through LinkedIn learning, our employees have access to a vast library of online courses, enabling them to develop new skills, stay ahead in their field, and drive innovation within the company. By investing in digital learning, we foster a culture of curiosity and growth, ensuring that our people are equipped with the knowledge and tools to build a sustainable future, both for themselves and for Sunweb Group.

## Workations

At Sunweb Group, we believe that a close connection to tourism, hospitality, our partners and a change of scenery fuels creativity, collaboration, and connection. Our team workations offer employees the opportunity to work remotely from one of our destinations while experiencing firsthand what we offer to our customers. During a 3- to 4-day workation, teams balance regular work tasks, destination exploration and team bonding activities. By visiting local partners and accommodations, our people gain valuable insights into our operations while strengthening team spirit.

Workations contribute to a more engaged and connected workforce, reinforcing our commitment to sustainability by fostering awareness of responsible travel and local partnerships. Through structured guidelines and content creation, we ensure this initiative adds value to both our people and our brand. In FY24, 36 of our colleagues participated in three workations to Crete, the Algarve and Turkey, respectively.

## Diversity in our sustainability communication

At Sunweb, we believe that holidays are for everyone. That is why we are committed to representing the diversity of our customers across all our markets. In our TV commercials, online campaigns and brand visuals, we consciously choose a cast that reflects a wide range of ethnicities, religions, backgrounds and identities. This approach is not only a reflection of our values, but also of the world we live in. We believe it is essential that people see and hear themselves reflected in the brands they engage with.

By embracing diversity in our marketing efforts, we aim to foster a sense of belonging, break down stereotypes, and promote inclusivity in the travel industry. This is not a one-time effort, but an ongoing part of how we operate and evolve as a brand. We are proud to take these steps



## S3: Affected communities

### Material topic:

- Impact on destinations (entity specific)

### *Material topic: Impact on destinations*

We are aware that tourism in general offers many benefits, but we recognise that it can also have a negative impact on the destination, both environmentally and socially.

### Environmental impact

Increased volumes of tourists can put a strain on local infrastructure and increased emissions through traffic and waste created on location. To mitigate these negative impacts, we encourage our transport, accommodation and destination partners to become sustainably certified, a crucial way to manage possible negative impact. In 2024, we agreed to work with Green Key, with the vision to making sustainable certification easy for all our partners.

### Travelife Certification

Travelife is a sustainability accreditation scheme that provides guidelines and measurement systems for sustainability in the travel industry. It encompasses the management of environmental, social and governance criteria, including energy efficiency, waste and water management, human rights and social impact.

In September 2023, we were awarded the highest Travelife certification status, Travelife Certified, for the second time. The recertification, which occurs every two years, will take place in 2025. Through this certification, formerly recognised by the Global Sustainable Tourism Council (GSTC) and from 2024 recognised by the ABTA and ANVR, we strive to set an example and inspire our partners to also increase their sustainability efforts.





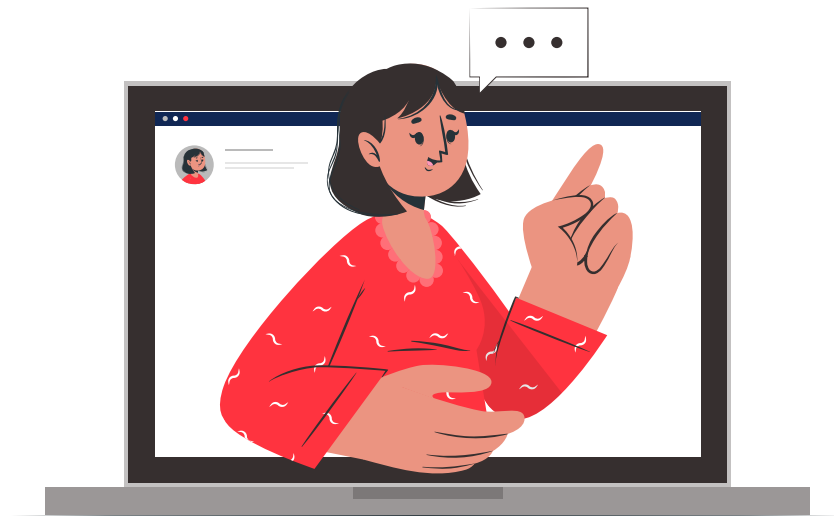
## Socio-economic impact

Protecting the authenticity of local cultures is important for the tourist industry, in part because it is key to offering a genuine visitor experience to our holidaymakers. Increased visitor numbers may contribute to eroding the cultural identity of a destination or create tensions within local communities.

With this in mind, we uphold our commitment to responsible tourism. This includes promoting lesser-known destinations, and supporting local enterprises through our offerings with Eliza was here, providing holidays off the beaten track.

## Digital Guides and a shift to local employment

In 2024, we decided on a fundamental shift in how we operate the in-destination service for our customers. With a move to employing local guides in cooperation with our partners, already based at the destination, further supported by digital guides online we wanted to reduce the number of seasonal employees from source market countries travelling to and from the destination.



Recruiting began in August 2024 and we expect to increase local employment opportunities by employing approximately 37% of our team directly at the destination, almost double the percentage amount from 2024. As part of the recruitment and employment process, all locally employed guides will also receive full Sunweb training to ensure consistency of service.

Our Digital Guides offer personal support to customers online and by phone, directly from our offices. This, combined with locally employed guides, will also contribute to reducing the number of employees travelling to and from destinations in 2025. In 2024, 75% of our guides were transported to destination – a number which we will reduce to 58% in 2025. This shift in employment strategy reduces travel requirements, supports local communities by providing employment opportunities, and reduces pressure on local housing, whilst retaining excellent customer service for our customers.

## Preparing Local Community Projects and Volunteering

To achieve our strategic goal of supporting local community initiatives, we began the process of selecting initiatives that would create positive impact at our destinations and source market communities.

We conducted thorough review, taking ideas and advice from a cross section of stakeholders within the business. This led to a number of potential options for a 2025 launch. For this process, we used the Reach Impact Convenience and Effort (RICE) framework to shortlist the initiatives for the ESG team, with the final list being agreed by the board.

We selected the following initiatives:

- A volunteering scheme for employees to participate in local activities,
- A collaboration with a DMC partner to promote career opportunities in tourism for local island inhabitants,
- Support for a charity that provides holidays for disadvantaged families, and
- Support to a charity actively working to protect winter mountain destinations.

## S4: Consumers and end-users

### Material topics:

- Cybersecurity & data privacy
- Access to (quality) information
- Customer service and satisfaction (entity specific)

### *Material topic: Cyber security & data privacy*

In today's digital age, where data and systems are constantly at risk from evolving cyber threats, we recognise the need to take a proactive and strategic approach to cybersecurity and data privacy. To ensure our organisation remains resilient, we re-evaluated our cybersecurity strategy and roadmap.

### Crown jewels assessment

One of the critical steps in this process was conducting a Crown jewels assessment. By identifying our most critical assets, including sensitive data and high-value systems, we were able to prioritise our security efforts. This targeted approach enables us to allocate resources efficiently, ensuring that we are defending what matters most to the organisation.

Rather than applying a one-size-fits-all security solution, this assessment allowed us to develop tailored protection that addresses the unique needs of each asset, ultimately reducing the risk of data breaches or cyber-attacks.

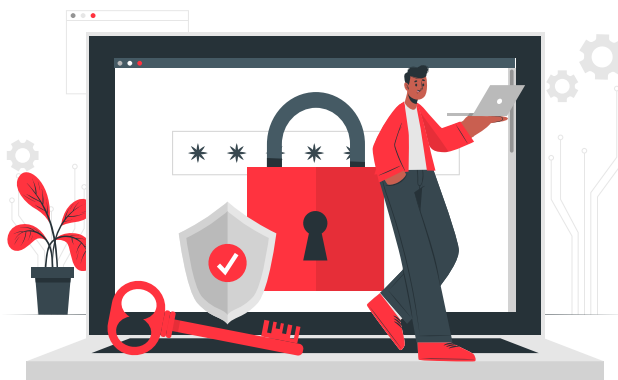
### Risk register

Recognising that effective risk management is an ongoing process, we also established a risk register. This tool serves as a dynamic repository of potential risks, allowing us to track, evaluate, and address vulnerabilities efficiently and effectively.

The decision to maintain a risk register was based on the understanding that cybersecurity is not a static issue; it is a continually evolving challenge that requires an agile and adaptable approach. By keeping a comprehensive record of identified risks and mitigation strategies, we ensure that we remain responsive and prepared for future threats.

### Security assessments

In addition to these foundational steps, we carried out multiple security assessments to identify weaknesses in our systems and processes. This hands-on approach allows us to take a proactive stance, uncovering and addressing potential issues before they can be exploited. By continuously testing our systems, we stay ahead of emerging threats and strengthen our defences over time.



### Awarded cybersecurity practices

Our efforts have been further validated through the recognition we received from our private equity partner, who awarded us for our strong cybersecurity practices. This acknowledgment not only reflects the commitment to our cybersecurity initiatives, it also reinforces the importance of our strategic focus on protecting critical assets and maintaining transparency with our stakeholders.

The reasoning behind our approach is simple: in today's complex digital environment, cybersecurity and data privacy are not just about preventing attacks, they are about building long-term trust with stakeholders and ensuring business continuity. By prioritising a strategic, risk-based approach – rather than relying on reactive or ad-hoc measures – we ensure that our organisation is well-prepared to handle current threats and resilient to future challenges.

As part of our broader environmental, social and governance strategy, we remain committed to continuously improving our cybersecurity practices, ensuring compliance with data privacy regulations, and fostering a culture of security awareness. This comprehensive approach allows Sunweb Group to protect both our digital assets and our reputation, creating lasting value for our business and the communities we serve.

### Material topic: Access to (quality) information

At Sunweb, we understand that providing accurate, reliable and transparent travel information empowers customers to make informed decisions. Keeping customers updated on travel restrictions, health guidelines, and destination risks enhances their safety.

Furthermore, educating customers about sustainable travel options through certification empowers them to make eco-friendly choices, reinforcing Sunweb's commitment to responsible tourism. Besides, proactively adhering to price communication and transparency regulations enhances consumer trust while improving website accessibility in line with EU legislation can reach a broader audience, including individuals with disabilities.

### Dutch travellers' attitude on sustainability

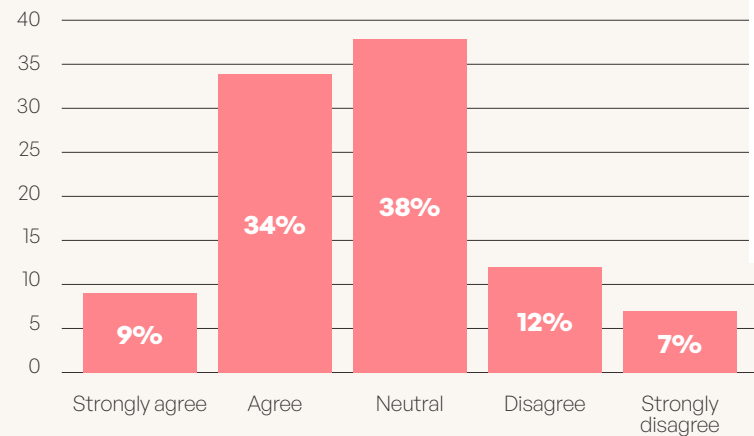
In July 2023, we obtained research findings on 'The attitude of the Dutch holidaymaker towards sustainability' from Trends & Tourism. We were able to add some specific Sunweb questions to this research. This research uncovered interesting results in terms of the information needs of holidaymakers, which helped us understand customers' demands.

It also led to the introduction of a sustainability filter on our Sunweb and Eliza was here websites.



### 'I find it pleasant when providers indicate how sustainable a holiday/trip/accommodation is'

More than 4 in 10 Dutch people find it pleasant when providers indicate how sustainable their offerings are.



#### Analysis by profile characteristics

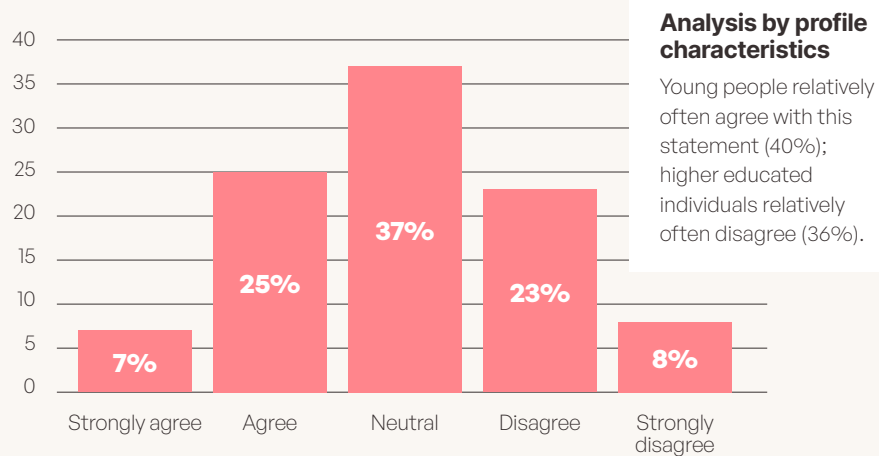
Higher educated individuals (49%) agree with this statement more than those with medium and lower education levels (42% and 34%, respectively).

**Question:** Here are some more statements about sustainability and holidays. To what extent do you agree or disagree with the various statements?

**Basis:** Dutch people who have taken a flight holiday in the past three years | n = 2,013

### 'If I want to know more about the sustainability of holidays/trips/accommodations, I know well where to find that information'

A third of Dutch holidaymakers indicate that they know well where to find more information about the sustainability of holidays; an equally large group indicates that they do not know.

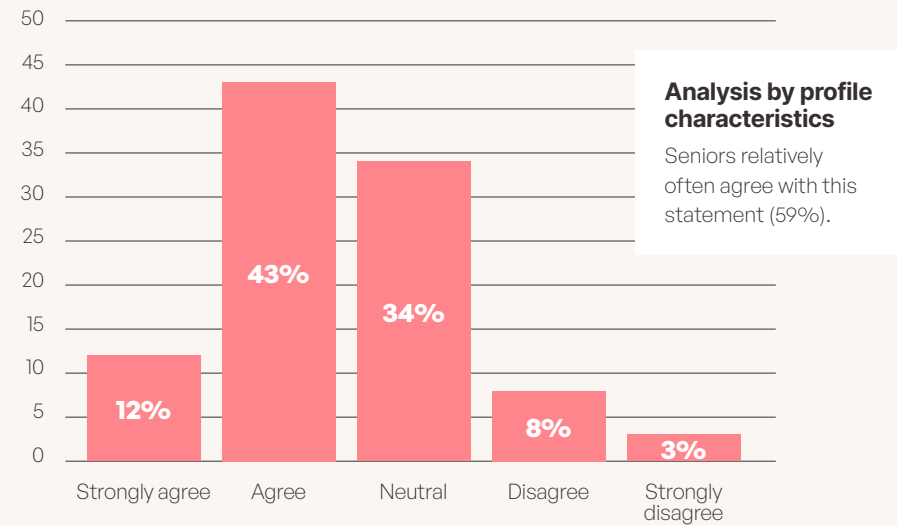


**Question:** Here are some more statements about sustainability and holidays.  
To what extent do you agree or disagree with the various statements?

**Basis:** Dutch people who have taken a flight holiday in the past three years | n = 2,013

### 'I find it difficult to assess whether a vacation is sustainable'

A majority of Dutch vacationers (55%) find it difficult to determine if a vacation is sustainable.



**Question:** Here are some more statements about sustainability and holidays.  
To what extent do you agree or disagree with the various statements?

**Basis:** Dutch people who have taken a flight holiday in the past three years | n = 2,013



## Positive assessment Dutch ACM

In the summer of 2023, the Dutch Authority Consumers & Markets (ACM) published new advertising guidelines. We took these guidelines as the basis for our pricing strategy, applying full transparency: all additional mandatory costs (including those to be paid at destination) are included in the price we offer. So, no hidden costs.

Based on a review of 12 travel companies by ACM, it announced that Sunweb Group is one of the few Dutch travel organisations that clearly communicates on package deals to its customers. We continuously monitor our compliance with actual regulations.

## Preparing for European Accessibility Act

Currently, we may be unwittingly excluding a group of clients to book with us. As we are striving to offer holidays for the many, the European Accessibility Act is a great opportunity to make our websites and apps accessible 'for the many'.

For Sunweb Group, this new EU directive means that our websites and apps need to be accessible for everyone. This includes people with certain disabilities, such as visual and hearing disabilities, and people with low literacy, colour-blindness, dyslexia, etc.

As a company we must be compliant with the Web Content Accessibility Guidelines (WCAG) that are part of the European Accessibility Act. In 2024, we started preparing for this act which will come into effect on 28 June 2025.

## Material topic: Customer service and satisfaction

### Enhancing customer service and satisfaction: a key to sustainable success

At Sunweb Group, we believe that exceptional customer service and satisfaction are integral to our sustainability efforts: you don't just book with us, you travel with us. As described in the previous chapter, S3: Impact on destinations, we have shifted to the use of digital guides and local employees, in part to enhance our customer satisfaction.

To ensure we are meeting and exceeding our customers' expectations, we have implemented a comprehensive survey system that captures feedback at various stages of their journey with us.

Survey system overview:

- 1 Post-Booking Survey:** Focused on the effort required to book a holiday.
- 2 Post-Contact Survey:** Concentrated on customer satisfaction after any interaction with our contact centre and (digital) guide teams.
- 3 Post-Holiday Survey:** Aimed at gauging the likelihood of customers recommending our services to friends and family.

### Diving deeper into our post-holiday survey

The post-holiday survey is sent to the booker of the holiday, inviting them to share their experiences and recommendations. In FY24, we achieved a remarkable survey completion rate of 32.5%, which translates to

93,349 respondents. This high level of engagement underscores our customers' willingness to provide valuable feedback.

One of the key metrics we track in this survey is the Net Promoter Score (NPS), which measures the likelihood of customers recommending our services. We are proud to report impressive promoter percentages across our brands:

- **Sunweb Sun:** 46% of respondents were promoters, rating us a 9 or 10 on the recommendation scale.
- **Sunweb Ski:** 47% of respondents were promoters.
- **Eliza Was Here:** An outstanding 66% of respondents were promoters.

These results highlight the success of our customer service initiatives and the strong loyalty our brands inspire. These high promoter scores, specifically the exceptional performance of Eliza was here, demonstrate our commitment to providing memorable and satisfying holiday experiences.

At Sunweb Group, customer satisfaction is not just a goal; it is a cornerstone of our sustainability strategy. By continuously gathering and acting on customer feedback, we ensure that our services evolve to meet the needs and expectations of our valued customers. We are dedicated to maintaining these high standards and further enhancing our customer service efforts to drive sustainable success.

# Governance

## Act Responsibly

Effective governance is the backbone of our sustainability strategy as we strive to 'Act Responsibly'. This chapter outlines Sunweb Group's commitment to maintaining a robust governance structure as we understand that strong governance practices are essential to build trust with our stakeholders and attain long-term value.

By nurturing a culture of accountability and ethical leadership, we aim to build a resilient organisation that can adeptly navigate challenges and seize opportunities in a rapidly changing industry. Our governance initiatives are fundamental to our mission of fostering sustainable growth and having a positive impact on society.



“

In our pursuit of sustainable growth, governance is paramount. Our culture is built on a foundation of integrity, transparency, and accountability. We are committed to fostering an environment where ethical practices thrive and our employees feel valued and supported. This commitment extends to every facet of our operations, ensuring that our actions reflect our values.

We maintain strong, collaborative relationships with our suppliers, work on fair payment practices and strict compliance with all regulatory requirements. By prioritising these principles, we not only enhance our operational efficiency, we also reinforce our dedication to sustainable and responsible business practices. Our governance framework is designed to uphold the highest standards of conduct, driving long-term value for our stakeholders and contributing to a sustainable future for the travel industry.

Through continuous improvement and vigilant oversight, we strive to lead by example, demonstrating that responsible governance is not just a requirement but a cornerstone of our identity. We believe that by embedding these practices into our daily operations, we can achieve meaningful progress and make a positive impact on the world around us.

”



**Jeroen de Swart**  
CFO Sunweb Group

## G1: Business conduct

### Material topics:

- Corporate Culture
- Management with suppliers including payment practices
- Compliance with regulations (entity specific)

### Corruption & bribery

Sunweb Group is an international digital holiday provider with a reputation for trustworthiness in the package travel industry, operating with the highest standards of integrity. We maintain an honest and professional attitude, striving to serve as a role model in the travel industry. This commitment earns the trust of all stakeholders, particularly our customers, suppliers, partners, shareholders, and employees.

To ensure compliance with these standards, Sunweb Group has developed a Code of Integrity outlining rules of conduct for management, employees, and other individuals representing the company. As part of this code, we maintain a zero-tolerance policy towards fraud and abuse or bribery and corruption. The Code of Integrity, along with other policies and guidelines, is part of our onboarding programme for new employees.

### Political influence

Under our Code of Integrity, bribery of public officials is strictly prohibited. As an international digital holiday provider active in several European countries, we frequently engage with legislators and regulators. These are mainly case-driven and take place in the public domain.

\*List of abbreviations: • ABTA: Association of British Travel Agents • ABTO: Association of Belgian Travel Organisers (General Belgian Association of Tour Operators and Travel Agents) • ANVR: Algemene Nederlandse Vereniging van Reisondernemingen (General Dutch Association of Travel Agents and Tour Operators) • APST: Association Professionnelle de Solidarité du Tourisme (Professional Association of Tourism Solidarity) [France] • DRV: Deutscher ReiseVerband (German Travel Association) • RID: Rejsearrangører i Danmark (Travel Organisers in Denmark) • SRF: Svenska Resebranch Föreningen (Swedish Travel Association)

Whenever possible and appropriate, we actively participate in public debates on regulations. Typically, we do this through representation by our national travel industry associations, including ANVR, ABTO, RID, SRF, ABTA, DRV, and APST. Active participation in these associations helps strengthen the sector, which we believe benefits both employees and customers.

In addition to travel industry associations, Sunweb Group is a member of e-commerce associations such as Thuiswinkel.org (NL) and Becom (BE).

For the incidental occasions when we participate in public debates in Brussels, we are registered in the EU Transparency Register under number 914468640225-42.



## Our Sunweb Values

Our core values underpin everything we do and guide our daily actions. We make sure that our colleagues are made aware of our values during onboarding days, displaying them around our offices and by regularly repeating and giving best practices on how to apply them during monthly company updates. These four values guide us in becoming a better company.



### I See You

We recognise and value each individual's unique talents and strengths, fostering a culture of genuine understanding. 'I See You' is about truly acknowledging someone's abilities, preferences, and strengths. Often, we don't take the time to get to know each other, leading to frustration and judgment of differences. Differing opinions can feel like threats. 'I See You' encourages us to slow down, be open, and view others with kindness and curiosity, striving to understand their perspectives.

### I Grow by Courage

True courage comes from embracing our inner strength, dreams, and authenticity, even when it means stepping outside our comfort zone. Courage doesn't mean pushing your limits or leaving your comfort zone at all costs.

Derived from the French word *coeur*, meaning 'heart', courage at Sunweb Group is about knowing this heart: its strengths, dreams, beliefs, and talents. We aim to inspire our people to learn, grow, and speak their truth at work. This takes courage, yet it fosters personal growth. Learning and being open to feedback are crucial parts of this journey.

### We Create Together

Collaboration is essential; every team member contributes their unique piece to our bigger picture. 'We Create Together' emphasises both creation and unity. Creating requires focus and impact, driven by a clear vision. Together, we learn to trust each other to create the best experiences. While working alone may seem faster, it often leads to issues down the line. So we reach out to colleagues and partners, pick up the phone, and start projects together.

### We Enjoy the Journey

By taking the time to pause, reflect, and celebrate milestones, we move forward with renewed energy and enthusiasm. 'We Enjoy the Journey' is about balancing pause and play. Making time for moments of pause allows you to press play with new energy. We slow down to speed up. Additionally, enjoyment means celebrating and having fun at work. We celebrate our failures as well as our successes, as we learn equally from both.



## Code of Integrity

We have drawn up a Code of Integrity which sets out rules of conduct for our management, (flex) employees and other individuals acting on behalf of Sunweb Group. 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, trade sanctions and confidential information. Employees are required to report cases of (suspected) violation of our Code of Integrity in accordance with the reporting procedures.

## 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. In addition to prohibiting unlawful actions, we want to create a culture in which employees address mistakes responsibly, enabling the company to learn from them.

We encourage employees to report observations or suspicions of fraud or inappropriate behaviour through our Speak-up policy. They should feel confident in reporting any findings or suspicions without fear of reprisal. Our employees are made aware of our Speak-up policy via posts on our internal company platform. It is also referenced during monthly company meetings.

# Speak up!

Sunweb Group encourages its employees to address and report inappropriate, unwanted, or dishonest behavior in the workplace.

We want Sunweb Group to be a **fair** and **safe** company



## Types of Issues to Report

### Inappropriate/unwanted behavior

- Bullying
- Sexual harassment
- Intimidation
- Discrimination
- Aggression/violence
- Stalking

### Dishonest behavior

- Corruption (e.g., bribery, favoritism)
- Fraud and theft
- Misuse of power or information
- Conflicts of interest
- Misconduct outside of work affecting the workplace

*Material topic: Management of relationships with partners including payment practices*

The strategic pillar 'Travel with us' is strongly connected to our network of local partners. This network or ecosystem of local partners is essential to delivering the best possible service to our clients. This allows us to respond faster to the needs of our clients at our destinations.

Our partners also bring a profound knowledge of our destinations, which enables innovation and supports relationships with local suppliers. This creates opportunities for mutual growth.

From a broader social perspective, our partners have a better understanding of the local culture and (educational) needs. This makes it easier for Sunweb Group to set up cooperations for initiatives to support the local community. Ultimately, we aim to create opportunities for more locally employed people on the destination.

## Green Key Partner Program

We started the process of selecting a certification partner who could help our accommodation partners to become sustainably certified. We reviewed several certification companies, all of which were GSTC-recognised (up to 31 December 2024). This meant that their assessment criteria would provide our customers and partners assurance that their certificate adhered to an industry-recognised standard.

We selected Green Key as our preferred partner, as they provide support in the countries in which we operate. This gives our accommodation partners help and guidance via a local contact and in their own language. By facilitating this process, we aim to increase the number of certified partners by promoting the benefits of certification for the partner, our customers and the travel industry as a whole.



## Payment practices

We value our partnerships and the importance of supporting a healthy local tourism industry. Fair payment terms are a means to this end. The largest share of our product-related purchases is done by our Swiss tour operator. We adhere to all applicable Swiss and/or EU rules and regulations.

We are continuously streamlining and digitising our contracting processes and strive to pay our partners in line with our contractual agreements. In exceptional

circumstances, we have been able to grant earlier payment to partners when required, and conversely, we have on occasion been allowed more flexible payment terms by our vendors.

## Health & Safety

We have updated our health and safety procedures to better protect our consumers and end users. Our partners and suppliers play a crucial role in this important initiative. Recognising the significance of close collaboration between Sunweb Group and our partners, we have shifted from a self-assessment process to a proactive approach.

To this end, we have added a clause to our hotel and transfer contracts, requiring our partners to confirm their compliance with our stringent health and safety requirements. This ensures that all our partners are aligned with our commitment to providing a safe and secure environment for our customers. This proactive measure enhances the overall travel experience and reinforces our dedication to maintaining the highest standards of health and safety across all our services.



## Material topic: Compliance with regulations

### Policies and guidelines

In this section, we outline the formal policies governing practices across our operations that Sunweb Group has in place. These policies serve as guiding principles, reflecting our commitment to corporate governance. Through transparent and accountable policies, we aim to uphold the highest standards, ensuring alignment with industry regulations and best practices.

### Data protection policy

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

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

### Cyber security policy

Protection of our information systems and data is vital 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 a key role in achieving this goal and is expected to 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.

### Risk management

Strategic, financial and operational risks are an inherent part of our business and are managed 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 daily. Based on these analyses, we take the required measurements to adjust the relevant items, monitoring their results and effect on our financial position.



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 able 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.

### Legislation

In 2024, the flow of legislation continued, both on EU and national level. We find new laws often include reporting obligations, for example on travellers' data, suppliers' or employees' data. As such, any legislative changes require diligent review and subsequent company-wide implementation, such as IT development and testing of data security measures.

Examples of such legislation include the Spanish Royal Decree 933/2021 (providing travellers' data), Italian Decree Law no. 145 on CIN (publishing registration numbers of accommodations), Spanish Inclusivity decree, as well as the EU's CSRD, AI Act, PTD, Accessibility Act, etc.

## Other relevant topics

### Advertisement restrictions for fossil fuel products

In 2024 a complaint was filed by Foundation Fossil Free Advertisements at the Dutch Advertisement Board (Reclame Code Commissie) claiming that Sunweb's ads for cruise travel should be considered in breach of the advertisement code, because it promotes behaviour that is detrimental to health and the environment.

The advertisement board rejected the claim, because the legislator didn't intend to prohibit advertisement for cruises and offering cruises is a legitimate practice. The claimant filed for appeal, but the board of appeal rejected their grounds and maintained the initial decision.

On a related topic, per January 2025 a ban on outdoor advertisement for (amongst others) flights and holidays became effective in the city of The Hague, The Netherlands. Such (local) regulations may have far-reaching consequences if other (local) governments adopt the same policies. This could form a serious restriction of our freedom of advertising and a limitation on our communications with our customers.

The Dutch Association of Travel Companies ANVR filed an injunction against this local regulation with the court of The Hague. On 25 April 2025, the court ruled that the regulation is not evidently unlawful. The municipality announced it will start enforcement per May 1st, 2025. ANVR is considering its next steps.

### Giving back to society

Sunweb Group and the Travel with your Heart Foundation (Stichting Reis Met Je Hart, NL) have been partners for many years. They are a Dutch foundation that offers free holidays to people who struggle to afford them due to financial pressures at home.

In 2024 we sponsored two family trips to Egypt and Turkey and we are happy to announce that both families appreciated their sunny holiday together as it helped them relax and recharge. We are proud to support these families and give them a well-deserved break.

We are currently organising more holidays for two different families in need, which are scheduled to take place in 2025.





# Invitation to collaborate and challenge

For us and our customers, ensuring a carefree and affordable holiday is our top priority. People will always seek to travel, whether to expand their horizons or find relaxation amidst their busy lives. However, we understand that the travel industry must evolve, and making more conscious choices is essential. As one of Europe's largest travel organizations, we are committed to addressing environmental, social, and governance issues by engaging and supporting our partners and customers.

We strive to meet consumer preferences while making sustainable choices clear and accessible. We adhere to legislation and actively participate in tourism industry developments to ensure we take the right, fair, and feasible steps. We acknowledge that travel will always have an impact, but how we manage that impact is what truly matters.

We invite you to share your feedback on our sustainability report and explore opportunities for collaboration to make the tourism industry more sustainable together. Please contact us at **[sustainability@sunwebgroup.com](mailto:sustainability@sunwebgroup.com)**.



**Sunweb Group**

# Annex

## List of abbreviations

- ABTA: Association of British Travel Agents 
- ABTO: Association of Belgian Travel Organisers 
- ACM: Autoriteit Consument & Markt  
(Netherlands Authority for Consumers & Markets) 
- ANVR: Algemene Nederlandse Vereniging van Reisondernemingen  
(General Dutch Association of Travel Companies) 
- APST: Association Professionnelle de Solidarité du Tourisme  
(Professional Association of Tourism Solidarity) 
- ATOL: Air Travel Organisers' Licensing 
- CFO: Chief Financial Officer
- CSRD: Corporate Sustainability Reporting Directive 
- DEIB: diversity, equity, inclusion & belonging
- DMA: double materiality assessment
- DMC: destination management companies
- DPO: Data Protection Officer
- DRV: Deutscher ReiseVerband (German Travel Association) 
- eNPS: employee net promoter score
- ESG: environmental, social, governance
- ESRS: European Sustainability Reporting Standards 
- EV: electric vehicle
- GHG: greenhouse gas
- GSTC: Global Sustainable Tourism Council
- IROs: impacts, risks and opportunities
- MDIEU: Maatwerkregeling Duurzame Inzetbaarheid & Eerder Uittreden  
(Customised scheme for Sustainable Employability & Earlier Retirement) 
- NPS: net promoter score
- OKRs: objectives & key results
- OTA: online travel agencies
- PAX: passenger(s)
- POC: People, Organisation & Culture
- PTD: Package Travel Directive 
- RGF: Rejsegarantifonden (Travel Guarantee Fund) 
- RICE: reach impact convenience & effort
- RID: Rejsearrangører i Danmark (Travel Organisers in Denmark) 
- SAF: Sustainable Aviation Fuel
- SBTi: Science Based Targets initiative
- SDG: Sustainable Development Goals
- SDP: Signal du Prorel (Sunweb Group subsidiary)
- SGR: Stichting Garantiefonds Reisgelden (Travel Guarantee Fund) 
- SRF: Svenska Resebranch Föreningen (Swedish Travel Association) (Sweden)
- TO: tour operators
- VSME: Voluntary Sustainability Reporting Standard for Micro & Small Enterprises 

## Description of material topics

Topical ESRS	Topic	Sub-topic	Sub-sub-topics	Description for SWG
ESRS E1	Climate Change	Climate Change adaptation & mitigation : GHG Emissions		Greenhouse gas (GHG) emissions refer to the emissions coming from SWG's travel operations, including flights, accommodation services and cruises, in line with the GHG protocol. These contribute to climate change. These emissions are mainly categorized under Scope 3 and accelerate global warming.
		Energy mix and consumption		SWG's energy mix and consumption refer to the total energy used and the type of energy sources utilized in our operations. This topic has great overlap with the material topic: GHG emissions.
ESRS S1	Own workforce	Working conditions	Secure employment	SWG provides stable jobs with benefits for office staff and tour leaders. As the nature of tourism can lead to employment insecurity for temporary workers.
			Adequate wages	An adequate wage is defined as a wage that meets the basic needs of a worker and their family, considering the national economic and social conditions. It is often higher than the legal minimum wage and reflects the actual cost of living in a particular location.
			Social dialogue	Social dialogue refers to the process of involving all stakeholders in discussion and decision-making on workplace issues and hybrid engagements within and between our local hub offices.
		Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	This topic requires SWG to ensure that all employees, regardless of gender, receive equal pay for performing work of equal value.
ESRS S3	Affected Communities	Impact on destination (entity specific)	Environmental impact	Environmental impact on destinations refers to the effects that tourism activities have on the natural surroundings of a location. This includes changes to ecosystems, pollution, waste, resource use, and the overall health of the environment.
			Social-economic impact	Socio-economic impact on destinations are to the effects that tourism activities have on the social and economic aspects of a location. This includes changes in employment opportunities, income levels, local business growth, cultural preservation, and community well-being.
ESRS S4	Consumers and end-users	Information related impacts for consumers and/or users	Access to (quality) information	This relates to providing accurate travel information, helping customers make informed decisions.
		Cyber security and data privacy (entity specific)		An adequate wage is defined as a wage that meets the basic needs of a worker and their family, considering the national economic and social conditions. It is often higher than the legal minimum wage and reflects the actual cost of living in a particular location.

		Customer service and satisfaction (entity specific)	Customer service and satisfaction refers to how well SWG meets or exceeds customer expectations.
ESRS S3	Business conduct	Corporate culture	Corporate culture refers to a set of beliefs, values, and behaviours that guide how a company's management and employees interact and conduct business. These values are SWG's compass in becoming a better company.
		Management of relationships with suppliers including payment practices	This topic refers to strong supplier relationships to ensure reliable service delivery and business stability. Ethical practices and transparency foster long-term partnerships, supporting economic stability of suppliers.
		Compliance with regulations (entity specific)	Regulatory changes can reduce demand, affecting job security and financial stability. Non-compliance with directives like the PTD can lead to severe legal consequences, posing fundamental risks.

## Link between last and this year's material topics

Pillar	2023 Material topic	2024 Material topic	Notes
E	Climate Change Mitigation	E1: Climate Change	
E	Climate Change Adaptation	E1: Climate Change	
E	Environmental impact on destinations	S3: Impact on destinations	
E	Circular economy & waste	Not material	Included in our Travelife certification explained under S3: Impact on destinations.
E	Animal welfare & biodiversity	Not material	Included in our Travelife certification explained under S3: Impact on destinations.
S	Diversity, equity & inclusion	Not material	Included in this report under S1: Other relevant topics.
S	Employee engagement & wellbeing	S1: Working conditions	



S	Employee learning & development	Not material	LinkedIn Learnings discussed under S1: Other relevant topics.
S	Employment practices & remuneration	S1: Gender equality and equal pay for work of equal value	
S	Health & Safety	Not material	Included under G1: Management and relationships with suppliers
S	Human rights	Not material	
S	Overtourism	S3: Impact on destinations	
S	Socio-economic impacts on destination	S3: Impact on destinations	
S	Sustainable behaviours	Not material	
G	Business ethics & integrity	G1: Corporate Culture	
G	Compliance	G1: Compliance with regulations	
G	Cyber security & data privacy	S4: Cyber security and data privacy	
G	Sustainable procurement	G1: Management of relationships with suppliers including payment practices	
G	Tax & regulations	Not material	

Illustrations in this document are from Storyset

Source details: [www.storyset.com/cuate](https://www.storyset.com/cuate)