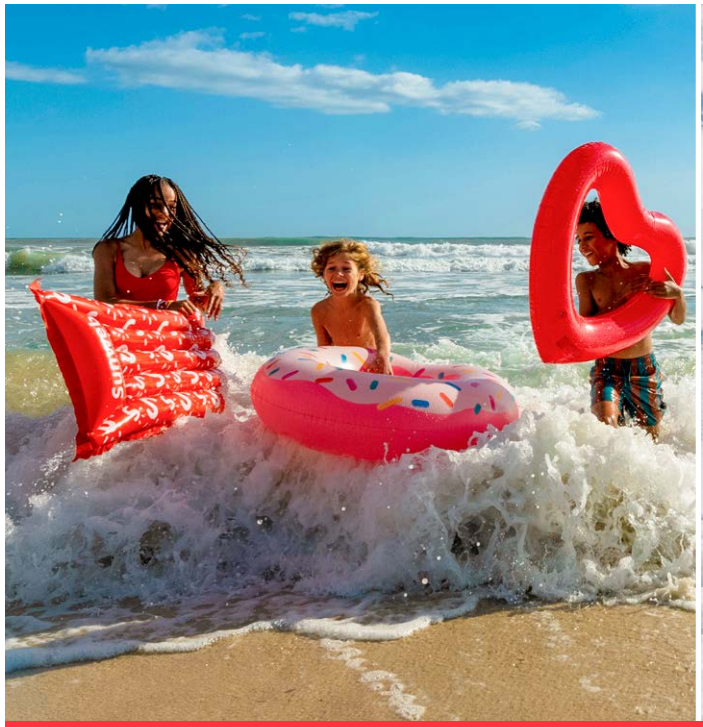
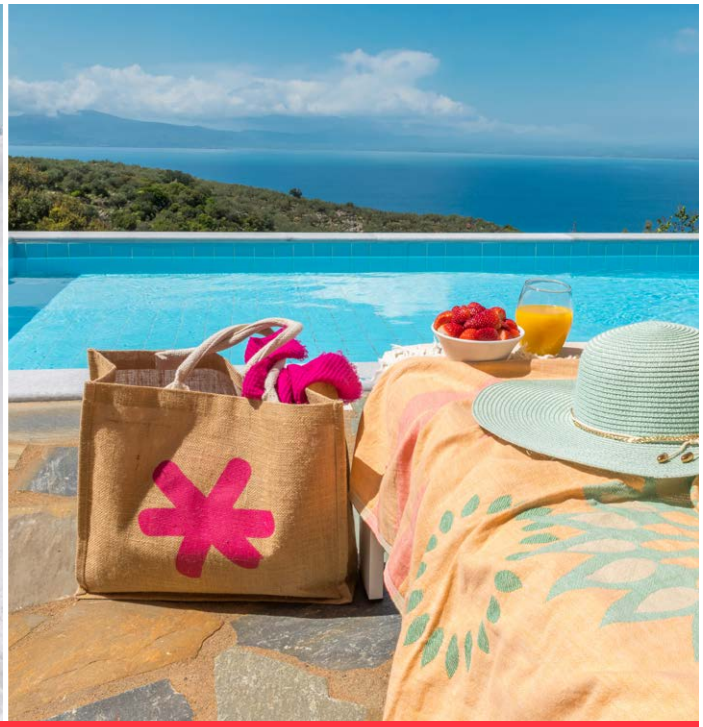




Sustainability report 2025

Sunweb Group

Contents

Foreword from our CEO – 3

About this report – 4

Key achievements 2025 – 5

Our business – 6
Our purpose, our vision, our mission – 7
Our flagship brands – 8
Organisational structure – 9
Organisation structure overview – 10
Sustainability Team – 11
Sustainability Strategy – 12
ESG focus areas – 12
Sustainability targets – 13
ESG Action Plan 2030 – 14
Stakeholders – 15
Our value chain – 17
Double Materiality Assessment – 20
Sunweb's ESG Reporting journey – 21

Environmental – 22
Drive Environmental Change – 22
Climate Change – 22
Material topic: GHG Emissions – 22
Material topic: Energy mix & consumption – 24
Our offices – 24
Our Sunweb operated SDP hotels – 25
Other key initiatives implemented by SDP – 25
Interview with SDP Technical Director Julian Simon – 26
Improved Scope 3 emissions calculations – 27
Reducing Scope 3 emissions – 27
Sustainable partner ecosystem – 31
Lower emission transport alternatives – 34

Social – 35
Create social impact – 35
Material topic: Working conditions – 39
Material topic: Gender equality and equal pay for work of equal value – 41
Other relevant topics – 43
Affected communities – 45
Material topic: Impact on destinations – 45
Consumers and end-user – 48
Material topic: Cyber security & data privacy – 48
Material topic: Access to (quality) information – 49
Material topic: Customer service and satisfaction – 51

Governance – 53
Act Responsibly – 53
Material topic: Corporate culture – 54
Material topic: Management of relationships with partners, including payment practices – 56
Material topic: Compliance with regulations – 57
Other relevant topics – 58

Invitation to collaborate and challenge – 59

Annex – 60
List of abbreviations – 60
Description of material topics – 61
VSME Reporting Annex – 62
Annex - subsidiaries – 69

Foreword from our CEO

At Sunweb Group, we believe holidays are an important part of life. Travel broadens horizons, brings people closer together and creates unforgettable memories. At the same time, we recognise that travel has an impact on our environmental and social footprint and that we have a responsibility to act.

As one of Europe's largest travel organisations, we take this responsibility seriously. Together with our colleagues, partners and industry associations, we continuously explore ways to make travel more sustainable. However, we are realistic, travel will always have an impact. What matters is how we manage that impact.

We are proud to present the Sunweb Group Sustainability Report for the financial year 2025. As the ad interim CEO of Sunweb Group, I am committed to making our holidays, operations and organisation more sustainable. Last year necessary organisational changes were made to strengthen our structure and ensure long-term resilience. We recognise that these changes affected our teams, which resulted in lower employee satisfaction (eNPS).

Alongside my colleagues, I strive to increase our sustainability efforts and drive positive change across the industry. This means making choices about the partners we work with and actively supporting them in implementing the necessary improvements to their business.

Helping our customers make responsible travel choices is still one of our key priorities. We support them by offering clear guidance in selecting more sustainable accommodations, transport options, and travel services. In 2025, we made great progress by introducing a sustainability filter on our websites, helping customers to make more conscious travel choices.

This new feature helps our customers access relevant information about sustainability certificates to support informed decision-making. We are proud to see the impact. More than 21% of Sunweb customers stayed in accommodations with an internationally recognised sustainability label, such as, Green Key, Travelife or Ecostars, with Spain and Turkey leading the way.

We take pride in presenting this report, which provides a clear overview of our progress and ongoing commitment to our Environmental, Social and Governance (ESG) strategy. Finally, I would like to express my sincere gratitude to our employees, customers, and partners for their continued dedication and collaboration. Only together can we create a more sustainable future for our industry.

Lars Löfgren
a.i. CEO, Sunweb Group

About this report

We are proud to present our fourth sustainability report. The reporting period of this Sustainability Report is in line with the reporting period of Sunweb Group's financial statements, 1 November 2024 until 31 October 2025, unless otherwise stated.

Whilst Sunweb is no longer subject to the mandatory requirements of the Corporate Sustainability Reporting Directive (CSRD), we are committed to reporting ESG information in a structured manner. We decided to follow criteria of a recognised European framework, (EFRAG's VSME[1]) ensuring that our reporting is comparable within the industry. Furthermore, this reporting standard also aligns with Sunweb Group's ambitions:

- Streamline ESG data collection
- Ensure consistency across all environmental, social, and governance topics
- Support transparent communication with stakeholders such as customers, partners, and investors.

The Voluntary Sustainability Reporting Standard for SMEs (VSME) no longer requires a formal double materiality assessment which helps organisations identify their most important focus areas (known as "Material Topics"). Despite this not being a requirement of the VSME, the value of a DMA is recognised when identifying business risks and impacts.

In this report, we share our progress on sustainability, and we have structured our report around our specific material topics relating to the three pillars of **ESG**.

- **Environment**
- **Social**
- **Governance**

Within the ESG pillars, we included the material topics in sub chapters based on the results from our double materiality assessment. This is the first year that VSME criteria has been incorporated into this report.

Throughout this report, we share our key achievements, challenges and using examples highlighting the results of the past year.

Our core 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 meaning we do not own airlines, accommodations or other services that we offer. We are therefore highly dependent on data provided by our partners and calculations based on estimates. We are working to increase transparency in all parts of the business. To do so, we are actively working on improving the accuracy of our sustainability data year after year, in close collaboration with our partners.

[1] VSME: Voluntary Sustainability Reporting Standard for Small and Medium-Sized Enterprises

"This year reminded us of what is possible, when commitment and collaboration come together. We increased the number of sustainably certified properties and saw one in five customers staying in these accommodations - a milestone I'm truly proud of. Despite a challenging year of structural changes, we strengthened our culture together with our People, Operations and Culture (POC) team. We launched a new Diversity, Equity, Inclusion and Belonging (DEIB) policy and formed a new team of ambassadors called, "the Culture Crew". Through strong partnerships, we made travel possible for people who needed it most. We renewed our Travelife Certified status for the second time and improved our governance with new policies and training. A heartfelt thank-you to our sustainability team and everyone across the organisation who helped progress on our ESG ambitions this year."

Monique van Agthoven
Head of Sustainability

Key achievements 2025

Environmental

- Our GHG Scope 1 & 2 **energy consumption reduced** by **15%** compared to 2024
- Our **renewable energy usage increased** by almost **23%** compared to 2024
- **71,5%** of our customers flew with airlines who have committed to working towards **"Science Based Targets"** (SBTI)[2] (versus last year at 69%)
- **21%** of Sunweb Group customers stayed in **sustainably certified** accommodations[3]
- **100** accommodation partners attended our **Green Key partner webinars** to access information on how to become sustainably certified
- **3** Sunweb managed (SDP) Hotels[4] received their first **Green Key**: Le Mont Corbier (Corbier), L'Ecrin des Neiges (La Joue du Loup) and Le Stella (Châtel)
- Through our partnership with Transavia, we bought 250 metric tonnes of **Sustainable Aviation Fuel (SAF)**, avoiding **917** metric tonnes of CO_2 emissions. This is a reduction of approximately **93,7%** compared to traditional fossil kerosine.

[2] SBTI: Science Based Targets initiative

[3] 21% reflected the actual percentage of sustainably certified accommodations on October 31st, 2025. For sustainably certified accommodations, we follow the ABTA/ANVR list of sustainability certification schemes for accommodation

[4] SDP hotels, residences and chalets 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 accommodations. We also have dedicated employees in the French Alps for the operation of 25 accommodations.

Social

- We organised **quarterly Sustainability updates** for colleagues, featuring expert guest speakers on overtourism, winter sports and climate change and climate literacy
- We continued our, **"Focus on You" Wellbeing Initiative**, providing employees and managers with a platform to book individual and team wellbeing activities
- We continued our **Leadership Program** with **16** leaders, trained **10** experienced high performing individuals and delivered team development training to **60** employees
- In 2025, **147** employees benefited from **LinkedIn Learning**
- We significantly **increased local employment** of our guides from 37% to **73%**
- We introduced a **new Diversity, Equity, Inclusion and Belonging (DEIB) policy** and roadmap to strengthen our commitment to a more inclusive workplace
- We launched the **Fast Forward Culture Crew (FFCC)**, a 14-member European wide team that strengthens belonging and brings our values to life
- **50% of our senior management is female** compared to 40% in 2024
- We introduced the **Lease-a-Bike program** to support sustainable commuting and employee health, **16** colleagues joined
- Through a local Dutch charity, **"Stichting Reis met je Hart" we organised and sponsored trips for 31 people**, primarily made up of families in financial need
- We organised **Team-Up and Clean-Up events** across several Sunweb Group offices over a six-month period, fostering employee engagement and creating positive local impact

Governance

- Sunweb Group successfully passed its third audit and **renewed its Travelife Certified** status for the second time
- Sunweb won the award for **World Best Ski Tour Operator** in 2025 for the **9th** time awarded by World Ski Awards
- We implemented a **new ESG policy and introduced an AI policy**
- **76%** of our employees completed our **IT security and privacy awareness training**
- We finalised the full (**100%**) IT implementation to comply with the **Spanish Royal Decree 933/2021**
- We finalised the full (**100%**) IT implementation of our **internal GDPR orchestrator**; a system that collects and deletes all personal data of a person at request

Our business

As one of the leading holiday providers in Europe, Sunweb Group is the driving force behind our two brands Sunweb and Eliza was here. We provide holidays to customers in across 7 international source markets: the Netherlands, Belgium, Denmark, Sweden, France, the United Kingdom and Germany. We have headquarters in Rotterdam and Zürich, software and web development offices in Girona, and various sales offices around Europe.

Sunweb Group at a glance

1.3 million customers

500+ full time employees (FTE)

7 source markets

2 flagship brands

100+ destinations

100% direct sales

5.500 key partners

€1.173 million turnover

Travelife Certificate since **2021**

Customers per source market

Country	Percentage
Netherlands	47%
Belgium	24%
Denmark	13%
Sweden	6%
France	6%
United Kingdom	3%
Germany	1%

Customers per destination country

Country	Percentage
Greece	27%
Spain	19%
France	18%
Austria	10%
Turkey	8%
Egypt	6%
Portugal	4%
Other	8%

Pan-European player with focused destination offering

Source countries
- The Netherlands
- Belgium
- Denmark
- Sweden
- France
- United Kingdom
- Germany

Headquarters
- Rotterdam
- Zürich

Regional offices
- Stockholm
- Copenhagen
- Antwerp
- Paris
- Chambéry
- Girona
- Zell am See

Our purpose, our vision, our mission

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

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

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

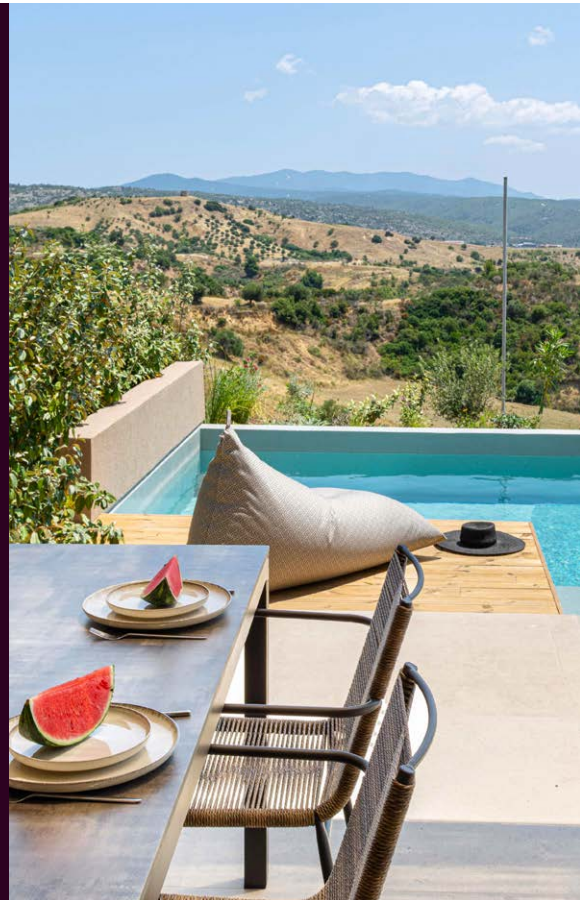
Sunweb Group operates several brands across 7 source markets. Discover our two flagship brands and find out how we create a well-deserved holiday experience for our holidaymakers.

Sunweb

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

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.



Organisational structure

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

Environmental, Social, and Governance (ESG) topics are managed across different areas of the organisation and are overseen by the Board of Directors. Sustainability is a recurring agenda item in the 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 topics 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 external partners in 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.

Our sustainability team is responsible for developing the sustainability strategy into an ESG Action Plan and policy. It develops and aligns objectives and initiatives with various departments and both internal and external stakeholders. The team ensures the implementation and execution of the ESG Action Plan.

During monthly sustainability meetings, ESG topics are discussed, initiatives are progressed, and any obstacles are addressed. The meetings are led by our Chief Financial Officer (CFO), with various departments taking part; Sustainability, POC, Purchasing, Legal, Compliance, Privacy and IT Security. Other colleagues are invited based on the agenda and relevant topics.

Organisation structure overview

Board of Directors

- Chair of the Board Per Agebäck
- Vice Chair Joost Romeijn
- Marcus Englert
- Anders Thulin
- Guus van den Elsen

Management

CEO a.i. Lars Löfgren

Director of People, Organisation & Culture Soraya Govers
- People Operations
- Talent Acquisition
- Business Partners

Director of Purchasing Eliza was here Iris Folia
- Purchasing
- Quality & portfolio management

Director of Ski Christian Tiefengraber
- Purchasing
- Groups
- SDP
- Product Management

Director of Sun Mervin Stroink
- Purchasing
- Quality & portfolio management
- Concepts & Events
- Destination Services
- Groups

Director Flight Capacity Transport Harm Groot
- Purchasing Flights
- Flight Operations
- Bus Purchasing & Operations
- Pricing

Director of Marketing & Customer Services Willemijn Rijpma
- Marketing
- Communications & PR (Head of: Martine Langerak)
- Content & Brandcare
- Analytics
- CRM
- Data Science

CFO Jeroen de Swart
- Finance & Control (Director a.i.: Olivier van Thuijl)
- Senior Specialists
- Sustainability (Head of: Monique van Agthoven)

CPTO Alan French
- Engineering
- IT Architecture
- IT Security
- Portfolio management
- Product & UX
- Product owners & business analysts

Board of Directors
- **Chair of the Board: Per Agebäck**
- **Vice Chair: Joost Romeijn**
- **Marcus Englert**
- **Anders Thulin**
- **Guus van den Elsen**

Management
- **CEO a.i.: Lars Löfgren**

Director People, Organisation & Culture Soraya Govers
- People Operations
- Talent Acquisition
- Business Partners

Director Purchasing Eliza was here Iris Folia
- Purchasing
- Quality & portfolio management

Director Ski Christian Tiefengraber
- Purchasing
- Groups
- SDP
- Product Management

Director Sun Mervin Stroink
- Purchasing
- Quality & portfolio management
- Concepts & Events
- Destination Services
- Groups

Director Flight Capacity Transport Harm Groot
- Purchasing Flights
- Flight Operations
- Bus Purchasing & Operations
- Pricing

Director Marketing & Customer Services Willemijn Rijpma
- Marketing
- Communications & PR (Head of: Martine Langerak)
- Content & Brandcare
- Analytics
- CRM
- Data Science

Chief Financial Officer Jeroen de Swart
- Finance & Control (Director a.i.: Olivier van Thuijl)
- Senior Specialists
- Sustainability (Head of: Monique van Agthoven)

Chief Product & Tech Officer Alan French
- Engineering
- IT Architecture
- IT Security
- Portfolio management
- Product & UX
- Product owners & business analysts

Sustainability Team

Jeroen de Swart
Chief Financial Officer

Monique van Agthoven
Head of Sustainability

Faye Granegger
Sustainability Lead

Sonam Raj
Teamlead People Operations

Cristian Pascariu
Head of Information Security

Joeri van Andel
Legal Counsel

Karin Boone
Compliance &
Data Protection Officer

- **Jeroen de Swart** – Chief Financial Officer
- **Monique van Agthoven** – Head of Sustainability
- **Faye Granegger** – Sustainability Lead
- **Sonam Raj** – Teamlead People Operations
- **Cristian Pascariu** – Head of Information Security
- **Joeri van Andel** – Legal Counsel
- **Karin Boone** – Compliance & Data Protection Officer

Sustainability Strategy

Sustainability was embedded as an organisational foundation in our company-wide strategy, along with 'IT Tech & Operational Efficiency' and 'Great Place to Work'. In 2024, we updated our sustainability strategy, which is now based on the 3 ESG pillars, using the material topics identified in our double materiality assessment.
For each of the 3 pillars, we have defined key focus areas. We have set targets for 2030 and created annual action plans that focus our efforts in the right areas. Our action plans include activities impacting all Sunweb Group stakeholders.

Stakeholder involvement
Our sustainability strategy is a result of a thorough and rigorous process., We started in 2024 with a double materiality assessment (DMA), based on the European Sustainability Reporting Standards (ESRS) in line with the EU's Corporate Sustainability Reporting Directive (CSRD). Subsequently, we facilitated multiple rounds of workshops to gain insight, input and feedback from our employees.

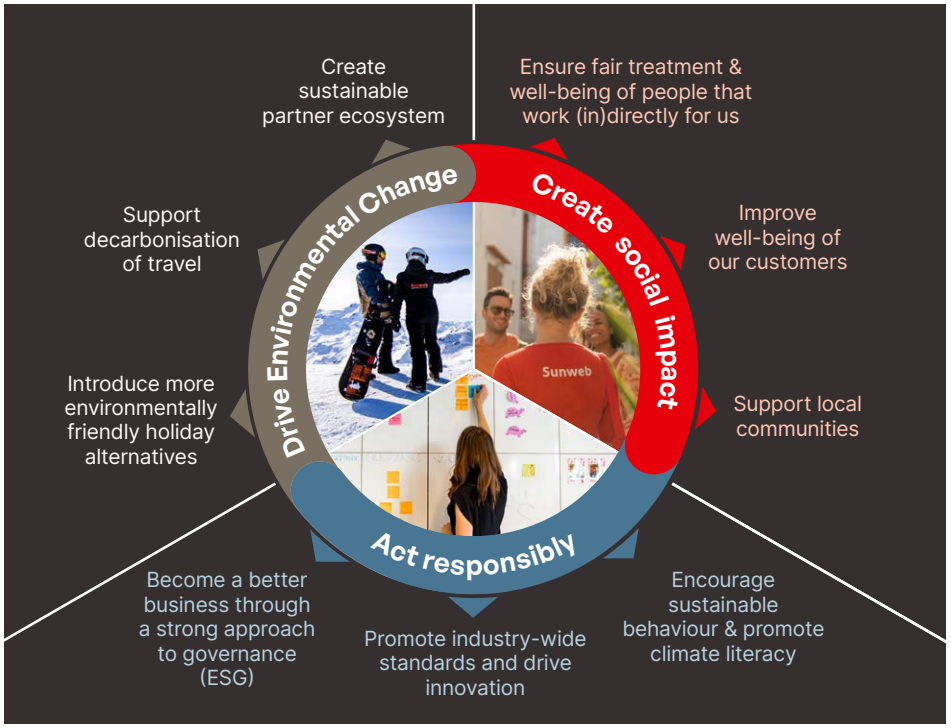
Throughout, the Board of Directors was involved in the process and approved the DMA and ESG yearly action plans until 2030.

ESG focus areas

Drive Environmental Change
- Create sustainable partner ecosystem
- Support decarbonisation of travel
- Introduce more environmentally friendly holiday alternatives

Create Social Impact
- Ensure fair treatment and well-being of people that work (in)directly for us
- Improve well-being of our customers
- Support local communities

Act Responsibly
- Become a better business through strong governance (ESG)
- Promote industry-wide standards and innovation
- Encourage sustainable behaviour and climate literacy



Sustainability targets

Setting clear targets is crucial for measuring progress and taking necessary actions in time, prioritising efforts, and transparently communicating progress on goals.

As part of our governance approach, we created action plans for the financial year 2025, based on the three ESG pillars and 2030 goals of our strategy:

- Drive Environmental Change
- Create Social Impact
- Act Responsibly.

The action plan initiatives were translated into Objectives and Key Results (OKRs[5]) to create focus, and to align department goals.

Whilst we concentrated on all 3 ESG pillars, the initial focus of these targets has been on Sunweb Group's environmental impact, due to the significant environmental footprint of travel in general.

Environmental

After launching our sustainability search filter for accommodations on our websites, we focused on training our accommodation partners and local agents on how to become sustainably certified. Our goal is to increase the number of customers choosing certified accommodations and by establishing a baseline measurement we have been to set realistic and measurable targets.

[5] OKRs: Objectives and Key Results

We also worked on a baseline measurement for our company-wide environmental emissions, which was verified by an external consultant. In line with the Greenhouse Gas Protocol (GHG), we renewed our environmental emissions dashboard, providing greater transparency and accuracy. This enables us to set more realistic targets for reducing our emissions.

Our ambition is to define short-term intensity based GHG Scope 3 targets, agree on company-wide initiatives and exploring setting a Science Based Target in 2027.

Social

Creating a new internal DEIB policy and action plan was also a key focus area. We selected new social impact initiatives such as, a new collaboration with a university and our local agent in our key destination of Crete, volunteering activities through clean ups in the French Alps and sponsoring holidays for families in financial needs through charity partnerships.

Governance

Our main priority was to update and create new ESG and AI policies. We also renewed our Travelife certification for the second time.

ESG Action Plan 2030

Based on our ESG Action Plan 2030, we create yearly action plans. We are working toward achieving the following targets by 2030:

Drive Environmental Change

Support our partners with sustainability certification. In 2030 we aim for:

- 80% of our customers booked in a certified sustainable accommodation[6]
- 100% of our Sunweb operated SDP Hotels properties certified[7]
- Our top 10 DMCs[8] are certified sustainable
- 80% of our customers fly with SBTi[9] aligned airlines

Support decarbonisation of travel.

- 100% renewable electricity in all our Sunweb operated offices and hotels by 2026
- We are in the process of defining science-based climate targets. Based on a 2024 baseline, we are exploring:
  - a 90% absolute reduction in Scope 1 & 2 emissions by 2035
  - a 90% reduction in Scope 3 emissions intensity by 2050
- Our ambition is to achieve net-zero emissions over time. The exact targets, timelines and feasibility are currently being assessed and will be validated against recognised standards.
- All Sunweb operated SDP hotels have electric vehicle charging stations

Introduce more environmentally friendly alternatives.

- Increase accessibility for our customers to more environmentally friendly holiday options
- Increase environmentally friendly transport options through improving connections with other transport platforms

Create Social Impact

Ensure fair treatment direct and indirect employees.

- Be an inclusive employer that values wellbeing, health, engagement and equal opportunities
- Further reduce gender pay gap
- Balanced mix of males/female employees
- By 2028, aim for 30% female members in our Cockpit and 50% our leadership group
- Strive towards key partners' employees being paid a fair living wage

Improve wellbeing of our customers.

- Advocate holidays affordable for all budgets
- Increase the (digital) accessibility of our holidays for everyone
- Offer our customers safe & healthy holidays

Support local communities.

- Contribute positively to local initiatives in both our source markets and destinations
- Actively work with our local partners on initiatives that mitigate the negative effects of overtourism

Act Responsibly

Become a better business through a strong approach to governance.

- Embed sustainability in our strategy, policies, and secure ownership
- Embed ESG in our internal reporting
- Build on our good reputation in compliance, policies, IT security and healthy funding

Promote industrywide standards and drive innovation.

- Advocate the sustainable aviation fuel market & other more sustainable means of transport
- Be a recognised sustainability promoter within the tourism industry
- Participate in industry wide projects on standards & innovation

Encourage sustainable behaviours and promote climate literacy.

- Ensure that all employees, partners, and customers, understand the environmental and social impact of holidays and know how they can positively contribute towards becoming more sustainable

[6] For certified sustainable accommodations we follow the ANVR/ABTA list
[7] SDP targets strongly depend on changes in ownership
[8] DMCs: destination management companies
[9] SBTi :Science Based Targets initiative

Stakeholders

Sunweb Group's stakeholders are groups or entities that have an interest in Sunweb Group. They are either affected by the actions of Sunweb Group, or they have the ability to 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
Customers	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
Employees	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. 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 Social section of this report.	Our internal SharePoint 'Flip', monthly Pause meetings, newsletters, in-person in our offices, and much more	Daily
Accommodation partners	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, Egypt, France, Greece, Italy, Morocco, Norway, Portugal, Spain, Tunisia and Turkey. 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.	Meetings, digital correspondence, in-person visits, events, formal contract signings	Daily
Airline & bus partners	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
Agent & Destination Management Companies (DMCs)	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

Stakeholder group	Description	Manner of dialogue	Frequency
Investors & lenders	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
Auditor	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
Regulatory entities	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
Industry associations	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[a]).	Working groups, meetings, digital correspondence, conferences	Quarterly
Our destinations & local communities	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
The Environment	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

[a] 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, we mapped out who is involved in creating our holidays, from suppliers and partners to our own employees. This helped us understand how each part fits together, where our biggest impacts are and where we can make the biggest improvements. We refer to this as our “Value chain”.

Sunweb Group utilised this value chain to assess the impacts, risks, and opportunities (IROs) and provided valuable insights which were used in our Double Materiality Assessment (DMA).

Step 1: Identifying value chain stakeholder
To assess our sustainability impact, we have mapped out the key stakeholders involved in our value chain. The stakeholders are grouped into different tiers based on how closely they are connected to our core business activities.

Identified stakeholders:
- Transport, accommodation and local services suppliers
- Service providers responsible for logistics, distribution and customer experiences providers
- Regulatory bodies and industry associations influencing standards and compliance.

Step 2: Indicate geographical context
Understanding where our key value chain stakeholders are located helps us identify environmental and social factors that could affect our operations. Some locations are particularly important because of access to resources, local sustainability practices, or regulatory frameworks. This insight enables us to make more informed decisions about responsible sourcing and our partnerships.

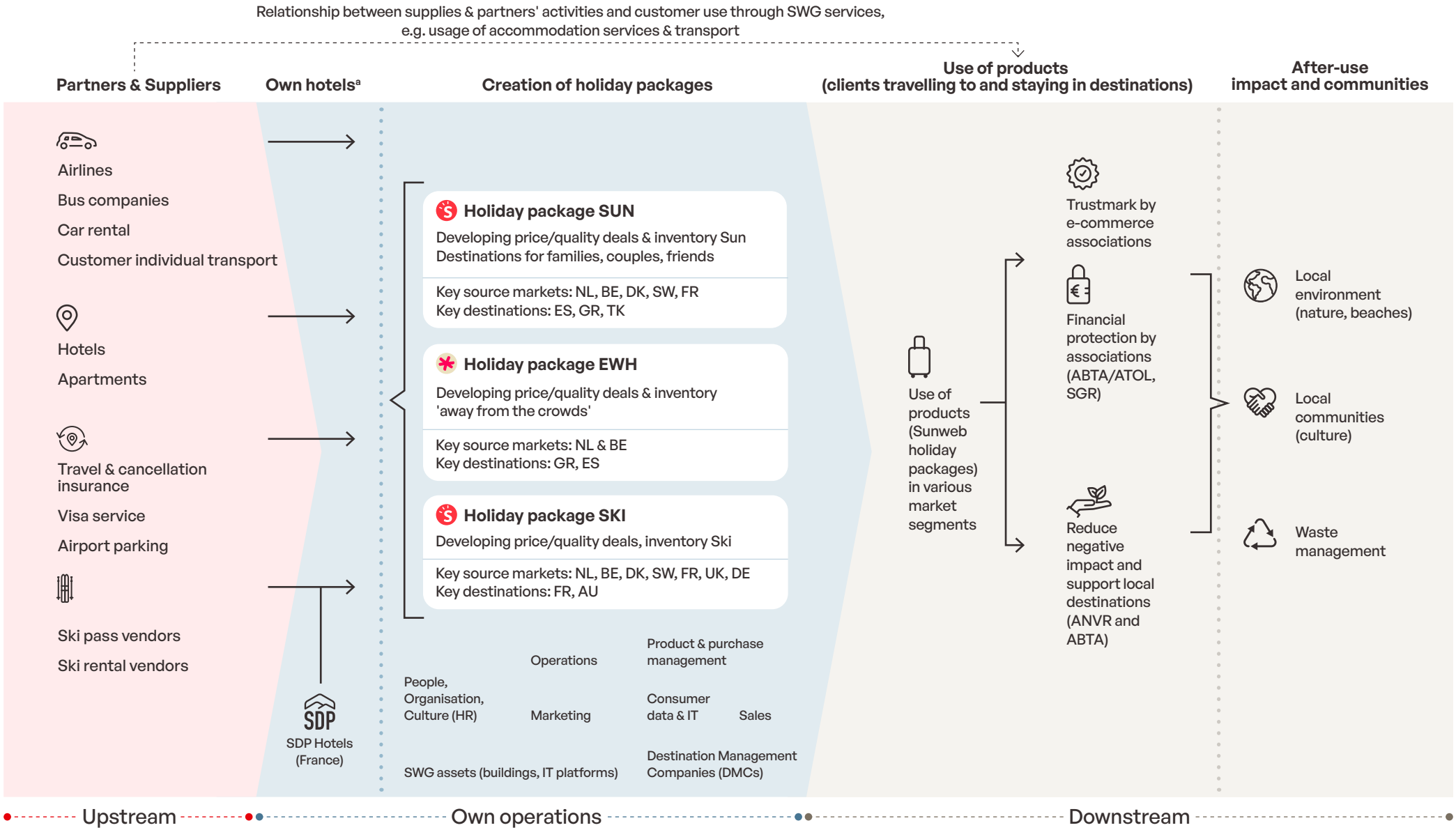
Step 3: Understanding activities and sectors
Each stakeholder operates within a specific part of our business, across sectors, such as hospitality, transportation, or tourism services. By mapping these activities, we can better understand where our main sustainability challenges such as, emissions reductions and fair labour practice occur across our value chain.

Step 4: Dependency evaluation
We review how much we rely on specific stakeholders, including partners, services, or resources and identify areas where this dependency could create risks. For critical resources or services, we look at potential issues such as supply disruptions, rising costs, or environmental impacts.

Step 5: Revisiting the Value Chain Map
The value chain mapping was evaluated with stakeholders on whether it requires adjustments.

Value chain mapping of Sunweb Group

A detailed textual explanation of this value chain diagram is provided on the next page.



[a] Own hotels and accommodations operationally controlled by SWG

This long description explains the value chain of Sunweb Group.
The value chain consists of four consecutive phases that describe how holiday packages are created, used, and how their effects extend beyond the customer journey.

The value chain is composed of 4 consecutive phases:

Partners and suppliers
Sunweb Group works with transport providers, accommodation partners, excursion providers, and other service suppliers such as skip pass vendors. These partners are selected based on price, quality, and availability. Destination management companies play an important role in managing local operations at the destinations. In addition, Sunweb Group operates a number of SDP Hotels, which are owned and managed internally.

Creation of holiday packages
In this phase, transport, accommodation, and additional services are combined into holiday packages offered under three brand propositions. These include Sun holidays for families, couples, and friends; Eliza was here holidays, which focus on experiences away from the crowd; and ski packages for winter sports holidays.

Customer use and protection
Customers use the holiday packages by travelling to and staying at the destinations offered by the three brands. During this stage, customer payments, travel arrangements, and safety are protected through e-commerce and industry associations. The company advocates responsible and more sustainable tourism practices to help reduce negative impacts and support local destinations.

After-use, impact and communities
After the holiday, Sunweb Group recognises that tourism activities have an impact on local environments, nature, beaches, and communities, including waste and resource use.

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 whilst investigating how Sunweb's operations affect the environment and society.

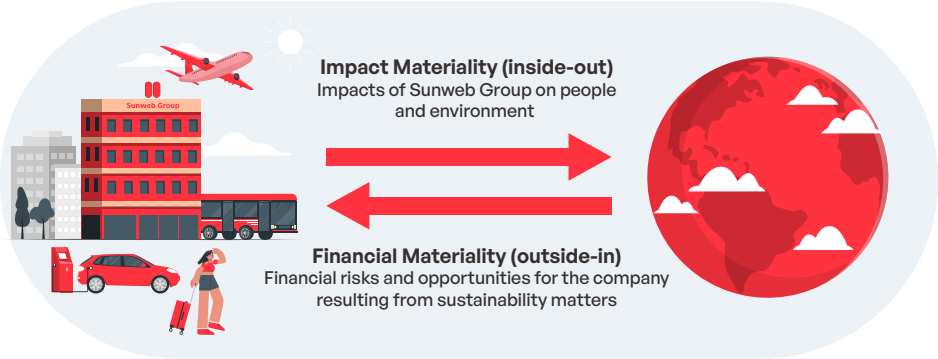
A DMA helps identify significant impacts, risks and opportunities (IROs) from both perspectives and guides us in the topics we report on.

Progress was made throughout 2024 by building on the double materiality assessment (DMA) conducted in 2022. In 2024, we also mapped our value chain and conducted several impact, risk and opportunity (IRO) scoring and validation sessions. We assessed materiality by determining which impacts are significant to people and the environment (impact materiality) and which risks or opportunities could financially affect the company (financial materiality), with the latter based on evaluating impact size and likelihood using a different stakeholder group, and combining those two factors to define overall financial materiality. Additionally, we secured the approval of the DMA process and outcomes with several stakeholders, including the Board of Directors and the Audit Committee. The full DMA process was described in our 2024 Sustainability Report.

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. As a result, we identified 13 material topics. Specific definitions of these topics are included in the appendix of this report.

Sunweb Group recognises that our material topics will change over time, therefore, we are committed to continuously refine our approach. This commitment involves adapting to new guidelines, using fresh insights, and learning from experience. This helps us understand risks, opportunities and impacts, ensuring our sustainability assessments remain accurate and relevant.



Material Topics by ESG Category

Standard	Topic	Material Matter
Environment	E1 Climate Change	Climate change • GHG emissions • energy mix & consumption
Social	S1 Own workforce	Working conditions (secure employment; adequate wages; social dialogue)
	S1 Own workforce	Gender equality and equal pay for work of equal value
	S3 Affected communities	Impact on destinations (entitiy specific)
	S4 Consumers & end-users	Cyber security & data privacy
	S4 Consumers & end-users	Acces to (quality) information
	S4 Consumers & end-users	Customer service and satisfaction (entity-specific)
Governance	G1 Business conduct	Corporate Culture
	G1 Business conduct	Management of relationships with suppliers including payment practices
	G1 Business conduct	Compliance with regulations (entity-specific)

Sunweb's ESG Reporting journey

The Omnibus package being accepted by the EU resulted in Sunweb Group no longer being in scope to complete CSRD reporting. After careful consideration and conversations with our Board, we decided to use our DMA results and adopt the VSME[10] standards as our chosen reporting method. In 2025, we reviewed the material topics from our DMA and decided to keep them unchanged.

Sunweb Group remains committed to sustainability and transparency on all three ESG pillars. We recognise that reporting on our environmental, social, and governance activities are essential for our long-term success, stakeholder trust and to support the travel industry's sustainable transformation.

VSME Reporting Standards

By connecting our internal reporting methods to the VSME Comprehensive Standard, Sunweb Group aims to achieve several objectives.

- Ensure that current and future ESG metrics are reporting on material topics to our business.
- Identify gaps and opportunities for improvement.
- Establish a flexible and scalable reporting model that enables Sunweb Group to meet evolving voluntary or mandatory reporting expectations without creating additional administrative burden.

In this report we describe the material VSME standards for 2025. Please refer to the annex at the end of the report for a full overview.

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 have added the VSME comprehensive standards in this year's sustainability report, to help understand the definitions of material topics in this Sustainability Report.

[10] VSME: Voluntary Sustainability Reporting Standards

Environmental

Drive Environmental Change

As part of our commitment to sustainability, we recognise the role we play in shaping environmental outcomes.

In line with our, “Drive Environmental Change” strategy goal, we focus on reducing GHG emissions and increasing renewable energy use, based on the outcomes of our double materiality assessment we have defined the following material topics.

Climate Change

Material topics:
- GHG emissions
- Energy consumption and mix

Material topic: GHG Emissions

Environmental impact of the tourism industry
Tourism worldwide accounts for approximately 8% of carbon emissions[11], which highlights the urgency to reduce the environmental impact of our holidays. Tourism contributes to climate change in many ways, through air, and road travel, as well as the consumption of goods and services such as food, accommodation, and souvenirs. Air Travel is often the biggest contributor to the negative CO_2 impact.

Our business' CO_2 footprint
We use the Greenhouse Gas Protocol[12], 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, (Sunweb Group).

- 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 customers to their destinations. Sunweb Group is an asset-light company, we work with partners to create our holidays without owning, hotels, airlines or other service providers. 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'

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

[12] WBCSD/WRI, 2004. Greenhouse Gas Protocol: a Corporate Accounting and Reporting Standard Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.

Greenhouse Gas (GHG) emissions in financial year 2025

Data point	Tonnes of CO_2 2025	Tonnes of CO_2 2024
Direct GHG emissions (Scope 1)	102	147
Indirect GHG emissions - market based (Scope 2)	63	136
Scope 3 Cat. 1 Purchased Goods & Services	5,792	N/A
Scope 3 Cat. 2 Capital Goods	410	N/A
Scope 3 Cat. 3 Fuel and Energy-related activities	34	N/A
Scope 3 Cat. 5 Waste Generated in Operations	3	4
Scope 3 Cat. 6 Business Travel	474	1,372
Scope 3 Cat. 7 Employee Commuting	326	203
Scope 3 Cat. 11 Use of Sold Products	735,928	752,771
Indirect GHG emissions (Scope 3)	**742,967**	**754,350**
Total GHG emissions	**743,132**	**754,633**

In kWh	2025	2024
Energy usage from fuel - Scope 1 (in kWh)	510,096	654,941
Energy usage from utilities - Scope 2 (in kWh)	2,995,771	3,492,760
Total energy consumption Scope 1 & 2 (in kWh)	**3,505,867**	**4,147,701**
Energy consumption from renewable sources (in kWh)	665,708	542,040
Energy from non-renewable energy sources (in kWh)	2,330,063	2,950,721
Energy production from renewable resources (in KWh)	64,274	60,588

Scope 3 Emissions

In 2025, we expanded our Scope 3 emissions to include:

- Category 1; Purchased goods & services
- Category 2 Capital goods
- Category 3 Fuel and energy-related activities

Category 6; Business Travel

From 2025 onwards, this category includes transport only. Room nights were assessed as non-material and removed. In 2024, room nights were still included.

Category 7; Employee Commuting

In 2024, this category covered only commuting emissions from Dutch employees. In 2025, commuting emissions from all source markets were included, based on estimates.

Following a review by an external consultant, adjustments were made to the 2024 figures to include these changes.

Our total GHG emissions decreased by 1.51% compared to last year, mainly due to reductions in Scope 1 and 2. However, as Scope 3 accounts for 99.98% of Sunweb Group's environmental footprint, the impact on total emissions remains relatively small.

As part of our sustainability strategy, the centralised ESG dashboard is a crucial step towards improving the quality and transparency of our non-financial reporting.

Material topic: Energy mix & consumption

Reducing Scope 1 and 2 emissions:
Our Scope 1 emissions reduced by 30% and our Scope 2 by almost 54% in 2025 compared to 2024.

- Scope 1; fuel consumption in our offices and Sunweb operated SDP hotels decreased. This was mainly a result of a smaller car fleet; we reduced our office car fleet by 30% in 2025 compared to 2024..
- Scope 2; energy consumption decreased by 15% (kWh) in 2025 compared to 2024, mainly due to changes at Sunweb operated SDP hotels.
- Scope 2; the share of renewable electricity within Scope 2 increased from 16% in 2024 to nearly 22% in 2025. Our goal is to reach 100% renewable electricity across our own offices and Sunweb managed hotels by 2026.

Whilst over 99% of Sunweb Group's emissions fall within Scope 3, addressing Scope 1 and 2 emissions remains critical as the emissions are more directly within our control.

We are in the process of defining science-based climate targets. Based on a 2024 baseline, we are exploring:

- a 90% absolute reduction in Scope 1 & 2 emissions by 2035
- a 90% reduction in Scope 3 emissions intensity by 2050

Our ambition is to achieve net-zero emissions over time. The exact targets, timelines and feasibility are currently being assessed and will be validated against recognised standards.

Our offices

We are minimising the environmental impact of our office spaces by installing energy-efficient lighting, sensor technology, and more sustainable heating and cooling systems. Our largest 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 also share 336 solar panels of which we have an allocation of 56.1%. In 2025, the solar panels generated 64 MWh, which represents 22% of the Rotterdam office's annual energy consumption.

Where feasible, we switch to renewable energy when renewing office leases and prioritise electricity saving measures and other sustainability initiatives during office renovations.

Our Sunweb operated SDP hotels

In this section, we highlight the sustainability efforts within our Sunweb operated hotels, known as SDP. The SDP hotels, residences, and chalets are operated by Sunweb under multi-year lease contracts, which, unlike the other hotels we offer in our holiday packages, allows us to take a more active role in driving positive impact. We also have dedicated employees in the French Alps for the SDP operation of 26 accommodations, where over 50.000 of our customers stayed in 2025.

Overall Reduction
SDPs energy consumption decreased by 14% in 2025 compared to 2024, which significantly contributed to the reduction of our total Scope 1 & 2 emissions. This decrease was driven primarily by improved insolation measures, resulting in less heating usage, however a reduction of 140 rooms across the portfolio will also have contributed to reduced energy consumption.

Key changes:
- Improved insulation and heating efficiency
- Replacement of heating and water insulation pipes
- Installation of centralised temperature control systems across four SDP hotels
- Reduced heating demand due to better insulation
- Replacement of high-consumption equipment
- Old electric heaters with high energy consumption were replaced in selected accommodations
- Conventional lighting was replaced with LED lighting
- Lower gas consumption
- Replacement and repair of old boilers and cooking installations
- Behavioural change
- Employee training contributed to operational improvements

Other key initiatives implemented by SDP

Waste management
In 2025, SDPs total waste was reduced by 9% compared to 2024, mainly due to a reduction in cardboard and paper. Single-use plastics were eliminated, and waste separation was introduced in all bars and restaurants across SDP hotels by the end of the 2024 winter season. In addition, waste separation was implemented in the corridors of four properties in 2025, with work currently underway to introduce waste separation in three additional residences.

ECOLABEL cleaning products
Exclusive use of ECOLABEL and other concentrated cleaning products, and correct storage.

Water consumption
Water consumption for SDP is similar to the previous year at 53.000m3. Further reductions are planned by replacing toilets with dual flush toilet buttons and the installation of economical showerheads and taps.

Sustainable communications
We communicate with guests during their stay on how they can reduce their environmental impact, and this is also integrated into staff training.

Green Key certification
The Green Key certification processes helped all SDP accommodations to focus on clear environmental reduction goals and ESG guidelines. 3 new SDP hotels received their first Green Key certificate in 2025, and 1 accommodation renewed its certificate for the second time in 2025.

Policy & goals
We continuously adhere to new sustainability policies and goals, and we are proud of the efforts of our SDP team. We will continue to focus on further reducing our environmental footprint in the coming years.

Interview with SDP Technical Director Julian Simon

SDP made great progress with 3 new Sunweb managed SDP hotels that became Green Key certified. Why is this certification important for you?
Green Key helps us reduce our environmental impact by providing us with clear sustainability guidelines. The guidelines support lower energy use, setting reduction targets, cutting waste and choosing more sustainable products. Certification helps us measure progress and create a yearly ESG action plan and very importantly, earning the Green Key certificate has created a great sense of pride within our team.

Last year Hotel Residence Club Margot Superdévoluy received its first Green Key certificate. Was it easier to achieve a second Green Key certificates?
It was easier for the teams as they were already familiar with the certification process. The criteria, audit process and challenges were known, therefore starting with the process for the new hotels was much quicker. The challenge for us now is to continuously improve. Just like skiing, the sec ond run is always easier, however you need to keep applying your techniques until they become part of your normal way of working.

We noticed a significant decline in electricity consumption for Sunweb managed SDP hotels & resorts in 2025. Was this decline a result of your Green Key certification?
The drop in electricity use at SDP accommodations in 2025 was, in my opinion, partly due to becoming certified in four accommodations. When operating 25 accommodations, we know that year on year results can vary. This is due to changing lease conditions, operations, and customer numbers. However, as part of our work towards Green Key certification, we implemented measures to reduce electricity and gas use, including replacing old heaters, changing lighting with LEDs, adding smart regulator controls and increasing communication to staff, and customers. We are now seeing the benefits of these changes.

What would be your advice to other Sunweb partners on certification?
I would advise all accommodations to start the certification process as soon as possible. Certification provides clear guidance to improve sustainability performance. Furthermore, times have changed, and both employees and customers increasingly expect more sustainable processes in their accommodations.

Which areas will you focus on for SDP in the near future?
We are now re-certifying our first hotel and certifying our high-volume residences for the first time. After that, we'll start the process with all remaining SDP residences to meet our goal of all properties certified by 2030. Alongside reducing energy use, water consumption and waste, we are increasing our use of sustainable products. We will also continue to join Sunweb-organised clean up events.

We see positive changes in the destinations where we operate. It is clear that together with our partners, we share the same goal of providing a more sustainable environment for our customers.

Improved Scope 3 emissions calculations

Considerable progress was made in GHG reporting by closing data gaps and expanding coverage across Scope 3.

We added the following categories:

- **Category 1: Purchased goods & services**
  Newly included spend-based emissions for key cost categories such as marketing, employee benefits, facilities, and IT, based on Profit & Loss data.
- **Category 2: Capital goods**
  Reports our housing (rentals) and Sunweb managed SDP Hotel expenses (spend based).
- **Category 3: Fuel and energy-related activities**
  We calculated the upstream emissions related to energy consumption for Scope 1 and 2.
- **Category 7: Employee commuting**
  Reporting was expanded to include employees from all offices.
- **Category 11: Use of sold products**
  We have worked closely together with the Dutch ANVR, to define and renew emission factors.

Our full GHG calculation has been verified and reviewed by an external consultant.

Reducing Scope 3 emissions

Most of Sunweb Group's environmental footprint (99,98%) comes from Scope 3. Within Scope 3, the majority of emissions, (99.05%) are from Category 11, (99,05%) Use of sold products.

Within this category we report on all sold holiday packages. Most emissions come from transport, with purchased flights being the largest contributor.

Our GHG Scope 3 emissions decreased by 1,51% in 2025 compared to 2024, mainly as a result of a 2,24% emissions reduction in Scope 3 Category 11, Use of sold products.

The decline is partly explained by a 1,8% decrease in the number of customers who travelled with us compared to 2024. However, the main reason is due to a change in product mix, as we saw a decrease in our summer brands and an increase in our ski brands, resulting in lower emissions per customer.

Emissions for our Sun brand decreased by 4,9% year on year, however total emissions remain relatively high for this brand due to the high share of air travel. Emissions for our Ski brand increased by 4,1% however, emissions per customer remain lower, as customers mainly travel by car.

To reduce emissions, we focused on several key actions: We encouraged our airline partners to set GHG reduction targets aligned with the Science Based Targets initiative (SBTi), and we invested in sustainable aviation fuel (SAF). In addition, we actively advocate for greater sustainability within the airline industry and have begun exploring short-term emission reduction initiatives in close cooperation with Transavia.

Employee commuting

Employee commuting emissions are partly reported under Scope 1 and 2, including the use of leased or Sunweb-owned vehicles and partly under Scope 3, including commuting by public transport or employees' own vehicles.

We introduced a lease-a-bike scheme in the Netherlands, Belgium and Sweden to promote more sustainable commuting and support employee wellbeing. Across most countries, we also fully reimburse employees for commuting by public transport.

As a digital company, we support working from home for up to 50% of an employee's working hours. We prioritise online meetings to reduce business travel and commuting, and we try to avoid peak travel hours for meetings that require physical attendance.

Sunweb Group has started to transition its fleet of 30 cars to electric vehicles (EVs). Where feasible, we prioritise replacing them with electric alternatives, either at the end of their lifecycle or when lease contracts are renewed.

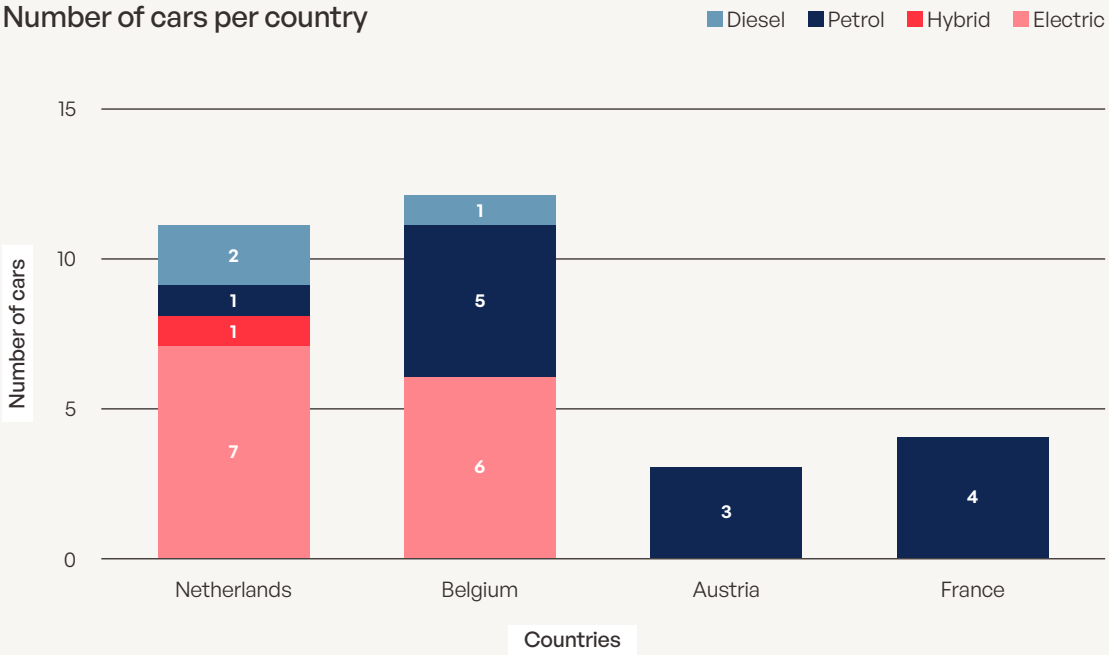
While this did not directly reduce our total emissions, our Scope 1 and 2 emissions decreased following a 30% reduction in our car fleet last year, achieved by offering employees a mobility budget (reported under Scope 3) instead of a company car.

Overview of the fuel types of our fleet in percentages

Fuel type	Netherlands (vehicles)	Belgium (vehicles)	Austria (vehicles)	France (vehicles)	Total vehicles
Petrol	1	5	3	4	13
Diesel	2	1	0	0	3
Electric	7	6	0	0	13
Hybrid	1	0	0	0	1

Conclusion: *Fleet - 47% vehicles are EVs/hybrid*

Number of cars per country



Impact of flights
For many of our key destinations, there are currently no viable alternatives to flying, making it essential to assess and address the impact of air travel.

As we do not own or operate our own aircraft, we are in ongoing conversations with our airline partners on topics such as fleet renewal, waste, weight, noise reduction and route efficiency. We are also discussing how we can offer our customers an option to buy extra SAF.

We have established engagement targets for our airline partners, encouraging them to set their own GHG reduction targets through SBTi. Through this collaboration, we aim to align sustainability efforts with scientific benchmarks and support the transition to a more sustainable aviation industry. In 2025, 71.5% of our seats were booked with airlines aligned with the SBTi, up from 69% in 2024.

Target: **By 2030 80% of contracted seats booked on airlines that are committed to Science Based Targets.**

Science Based Targets initiative
The Science Based Targets initiative is a global initiative led by the CDP (previously known as the Carbon Disclosure Project), the United Nations Global Compact, World Resources Institute and the Worldwide Fund for Nature.

It supports companies in setting Greenhouse Gas (GHG) reduction targets that are aligned with climate science and consistent with the goals of the Paris Agreement to limit global warming to well below 2°C above pre-industrial levels.

To be considered 'science-based', targets must 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 sciencebasedtargets.org.

In 2025, we started a feasibility review to assess if committing to the Science Based Targets initiative (SBTi) was possible for Sunweb Group. This process began with an external review of our GHG emissions, followed by the development of an updated GHG emissions dashboard.

Following the review: SBTi targets will be calculated, and their feasibility and cost implications assessed. Finally, senior management will use the data to decide on whether the commitment is an option. Setting science-based targets would: enable us to define emission reduction goals, increase transparency and provide clear direction for future climate actions.

Sustainable Aviation Fuel

We believe that the most impactful short-term measure to reduce emissions from flying is the use of sustainable aviation fuel (SAF) which is why in 2024, Sunweb Group began to directly invest in SAF with partner airlines.

In 2025 we invested in 250 mt Sustainable Aviation Fuel (SAF), through our SAF partnership with Transavia, directly resulting in 917 metric tonnes CO_2e GHG emissions reduction. This is a reduction of 93,7% compared to traditional fossil kerosine. The fuel is produced from sustainably sourced renewable waste and residue raw materials such as used cooking oil.

As of 1 January 2025, EU legislation now requires aviation fuel suppliers to blend at least 2% of SAF into all flights departing from the EU. As a result, we have reduced our direct SAF investments and shifted our focus towards joint emission reduction projects with airline partners.

We also launched the 'Innovation Route project' and collaborated with Transavia on a test flight between Rotterdam and Faro. The initiative focused on reducing emissions through measures such as lowering hand luggage weight, raising customer awareness and offering more sustainable services. In 2026, we will increase the number of joint reduction initiatives with Transavia.

"Transavia is actively working on reducing its environmental impact. Our approach is two-fold:

Firstly, for impact in the coming years, we are replacing our entire fleet from Boeing to the quieter and more fuel-efficient Airbus Neo aircraft. We are also continuously implementing changes to improve the fuel efficiency and reduce the weight onboard. Finally, we are gradually scaling up our SAF usage. Transavia also established an innovation route between Rotterdam and Faro, where we test new initiatives to lower emissions and waste together with our partners, including Sunweb.

Secondly, we are investing in new innovations which we expect to have 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 innovative technologies. For example: investing into noise reduction research, collaborating with battery-electric aircraft manufacturer, and scaling-up new carbon capture technologies.

We believe in collaboration across the value chain together with our partners, like Sunweb Group, who also join us in the efforts to de-carbonize further."

Paul Terstegge
CEO of Transavia

Sustainable partner ecosystem

We aim to create a more sustainable partner ecosystem by working with all our transport suppliers, accommodations, DMCs and local service providers.

To support and encourage our accommodation partners, we also focus on training our colleagues and local destination management companies (DMCs) in the sustainability certification process.

Certification goals:

Target: **80% of our customers books a certified hotel by 2030**

Target: **Our top 10 DMCs customers Travelife certified by 2030**

Transparency on accommodations
In March 2025, we introduced a sustainability search filter on our Sunweb and Eliza was here websites. The filter allows our customers to quickly and easily find accommodations that are certified by reputable and independent sustainability labels, allowing them to make informed choices when booking their accommodations. We believe that helping our customers to make responsible choices is essential for the future of the travel industry.

Our target is clear, by 2030, we want to have 80% of our customers booked in sustainably certified accommodations.

Accommodation sustainability certification
All accommodations included in the filter have been certified by labels (such as, Green Key, Travelife and Ecostars) that verify whether an accommodation meets strict sustainability standards. The criteria includes a review of, waste management, water and energy usage, biodiversity and working conditions. A third-party audit is always part of the certification process.

The certificates featured in our filter are included in the ABTA/ANVR list of sustainability certification schemes for accommodation[13]. To be included on the list, ABTA/ANVR demands that the following requirements are met:

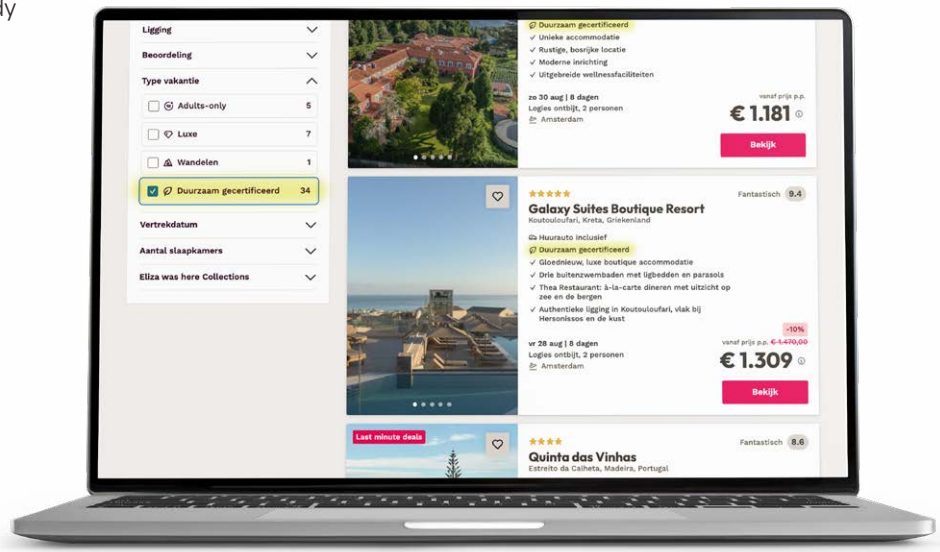
The Certification label is:
- part of the GSTC[14] Market Access Program

or
- has provided ABTA with a signed commitment to achieve accreditation by the end of 2026 from a national accreditation body that is a member of the International Accreditation Forum (IAF).

Certification plays a vital role in our ESG strategy and requires us to consider the implementation of the Empowering Consumers for the Green Transition Directive (Directive EU 2024/825, ECGT Directive) in 2026. This directive replaces two existing consumer directives, the Unfair Commercial Practices Directive (Directive 2005/29/EC, UCPD) and the Consumer Rights Directive (Directive 2011/83/EU, CRD).

The (ECGT) Directive introduces targeted rules to prevent vague or misleading environmental claims and unreliable sustainability labels. It also requires clearer information on guarantees, repairability, and product durability at the point of sale. In particular, the use of sustainability labels that are not based on a recognised certification scheme or established by public authorities will be prohibited.

These changes strengthen overall consumer protection by filling gaps in existing EU laws, without replacing more specific sector rules.



[13] Source: ABTA/ANVR list of sustainability certification schemes for accommodation
[14] GSTC: Global Sustainable Tourism Council

Partnership with BeCause
The search filter for certified sustainable accommodations on the Sunweb and Eliza was here websites uses a live API connection provided by, *BeCause* a platform that provides real-time data of sustainably certified accommodations. The number of certified accommodations on our websites is therefore always current, accurate and reliable.

Partnership with Green Key
Green Key is a leading sustainability certifier in the tourism industry. Through our partnership, we organised online training sessions to help our partners to become sustainability certified. In 2025, approximately 100 partners took part in the training sessions, of which 20 were trained in their local language of Spanish or Greek.

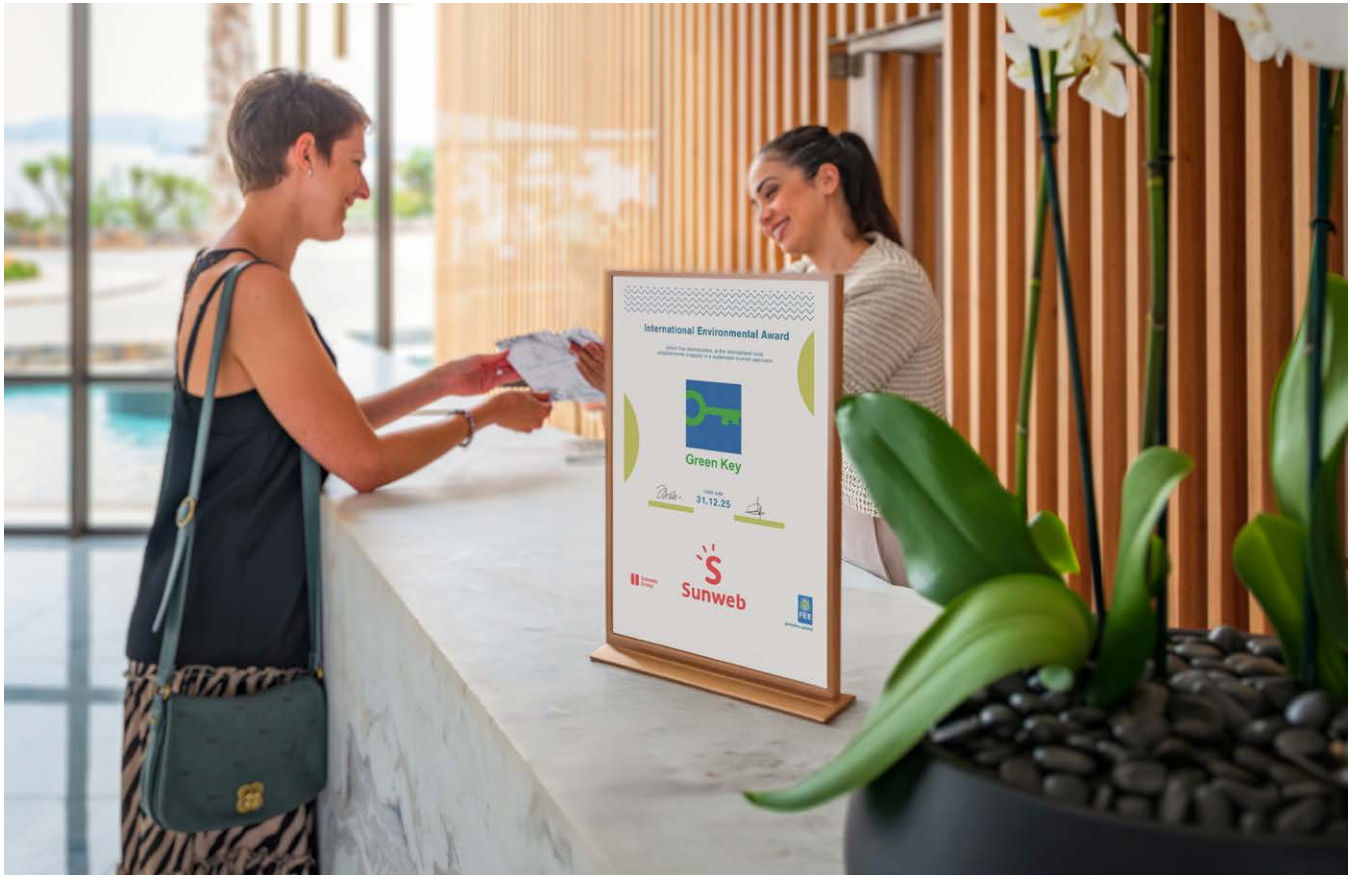
Baseline measurement of certified sustainable accommodations
Initially, we manually collected information on the number of certified accommodations within our business. However, we soon realised that the data was often outdated and unreliable. After connecting to BeCause, we used the accurate data to understand where we have the most sustainably certified accommodations and where we need to plan for improvements.

In October 2025, we measured that approximately 21% of our customers stayed in a certified sustainable accommodation across the Winter 2024/2025 (14.9%) and Summer 2025 (24.4%) seasons.

During this period, we recorded that over 40% of customers travelling to Spain and more than 30% of customers travelling to Turkey stayed in sustainably certified hotels. In contrast, the share of guests staying in certified accommodations in Greece was lower, at approximately 15%.

These insights enabled us to develop a focused plan to work more closely with our partners in Greece and encourage them to pursue sustainability certifications.

One of the key accommodations in our SDP portfolio, Club Margot, Superdévoluy. became the first property to achieve Green Key certification in 2024. During the winter season of 2024/2025, the property was awarded a three-year extension of the certificate. This achievement served as benchmark to support certification of more SDP accommodations. At the end of 2025, 3 new SDP accommodations were certified. Le Mont Corbier (Corbier), L'Ecrin des Neiges (La Joue du Loup) and Le Stella (Châtel).



Engaging our DMCs with Travelife
To support the certification of our local destination management companies (DMCs), Travelife prepared a presentation outlining the certification criteria, process and associated costs.

Last year, we carried out a review of the certification status of our DMCS. Only 1 DMC for Sunweb and 1 DMC for Eliza was here, was certified. Together with our business developer and purchasing teams, we initiated discussions with the DMCs to explain the certification process and agree on certification timelines.

Attitude towards an independent sustainability label
Research has shown that the majority of Dutch holidaymakers believe that an independent sustainability certificate, indicating the level of sustainability of a holiday, would be a good idea.

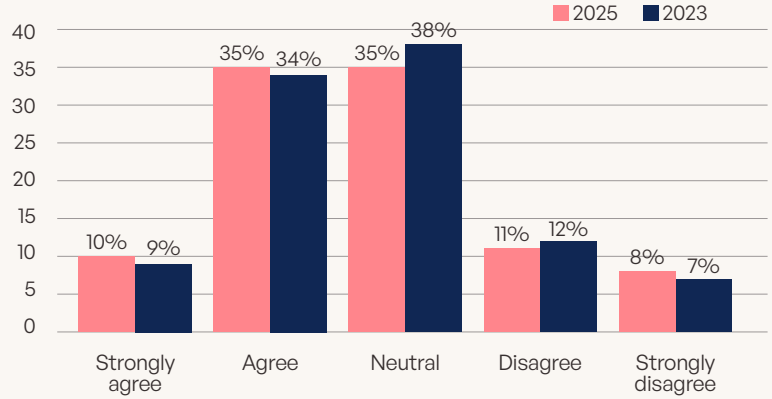
Statement: *'I like it when holiday providers indicate how sustainable a holiday/accommodation is'*.
To what extent do you agree or disagree with this statement?

Approximately 45% of the Dutch holidaymakers like it when holiday providers indicate how sustainable their offer is.

Response option	2025 (%)	2023 (%)
Strongly agree	10%	9%
Agree	35%	34%
Neutral	35%	38%
Disagree	11%	12%
Strongly disagree	8%	7%

Basis: Dutch people who have taken a flight holiday in the past three years. N = 2,002 (the sample size equals 2,002)

Analysis by profile characteristics
Generation Z and those with higher levels of education are particularly likely to agree with this statement (53% and 52% respectively).



TRENDS & TOURISM

Source: The attitude of Dutch holidaymakers regarding sustainability, Trends & Tourism, July 2025

Lower emission transport alternatives

We aim to reduce the environmental impact of transport to, from and within our destinations by reviewing alternative, less polluting transport options. One identified opportunity is to sell more car and bus holidays.

Bus and car holidays
For customers who want a lower emission transport option, travel by bus and car is often a better option. Travelling by bus is around 9 times cleaner than flying, producing approximately 89% less CO_2 per traveller[15].

Travelling to your holiday destination by car can be a good alternative. Based on CO_2 emissions per passenger kilometre, travelling by car becomes more sustainable than flying when two or more people travel together[16]. Emissions per person decrease further when the car is shared with additional passengers, such as families travelling 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 customers. Of those ski trips, 78% of customers opt to use their own transport, 14% of customers travel by bus and 8% by plane.

[15] BEIS/Defra Greenhouse Gas Conversion Factors 2019
[16] Milieu Centraal

Sunweb Group is the largest ski tour operator, providing bus transport options in the Netherlands and Belgium. In 2025, over 1000 buses transported our customers to the Alps.

Train holidays
Unfortunately, we had to discontinue our train holiday packages due to operational issues with train ticket bookings. However, we continue to monitor developments in train ticketing systems, the expansion of rail networks and any improvements of train frequency. We are also actively involved in conversations with our travel industry associations on this topic.

Cruise Holidays
In 2025, we made the decision to stop selling cruises. Cruises are about 5 to 9 times higher in CO_2 emissions per passenger kilometre compared to a flight[17]. This is one of the reasons we no longer offer this holiday option to our customers.

Cruises were never included in our Scope 3 emissions calculations. When we improved our holiday package calculations, we had already stopped selling cruises, meaning the exact impact cannot be determined. Last year, Sunweb Group sold cruise holidays to approximately 4.500 cruise customers.

[17] Source for emission factors: CO2emissiefactoren.nl, Personenvervoer, 2025

Social

Create social impact

The Social pillar plays an important role in our ESG strategy and steers many of our ESG activities. Aligned with our mission to create social impact, we focus on contributing positively to society. We believe that a sustainable future requires both environmental responsibility and a genuine commitment to the wellbeing of our employees, stakeholders and the communities in which we operate. This section of the report will focus on the following material topics:

- Working conditions
  - Secure employment
  - Adequate wages
  - Social dialogue
- Gender equality & equal pay for work of equal value
- Impact on destinations
- Cyber security & data privacy
- Access to quality information
- Customer service & satisfaction

Own workforce

At Sunweb Group, our people continue to be the foundation of our success. We believe that a healthy, inclusive and motivating workplace is essential not only for individual wellbeing but also for the long-term resilience and sustainable growth of our organisation. In 2025, we strengthened our commitment to Diversity, Equity, Inclusion and Belonging (DEIB), with a new DEIB Policy and setting Key Performance Indicators (KPIs).

We want our colleagues to feel valued, respected and empowered to perform at their best. Through our DEIB policy we aim to embed equitable practices at all times.

The introduction of measurable DEIB KPIs has improved our ability to monitor progress, identify areas for improvement and ensure accountability in creating a more inclusive workplace.

The 2025 employee feedback results reflected the impact of the organisational changes made the previous year. Whilst team engagement remained strong, several metrics experienced temporary declines as employees adapted to new structures and ways of working.

Employee Engagement (eNPS), Health and Wellbeing, and Diversity and Inclusion scores decreased from 2024 to 2025. Furthermore, the insights gathered are now used to make improvements for 2026. Despite these declines, our social and people-focused efforts continued to promote fairness, equal opportunity and a culture of belonging. Across all locations, we invested in initiatives to support:

- Employee wellbeing
- Inclusive leadership
- Local community support
- Improvement of our workplace culture.

These efforts reinforce our DEIB commitments and reflect our belief that every individual can contribute, grow and succeed.

Key employment figures

585
Total headcount

498
Number of internal employees by headcount

87
Number of external employees by headcount

59,6%
Female
Headcount: 296

40,4%
Male
Headcount: 201

100%
Total
Headcount: 498

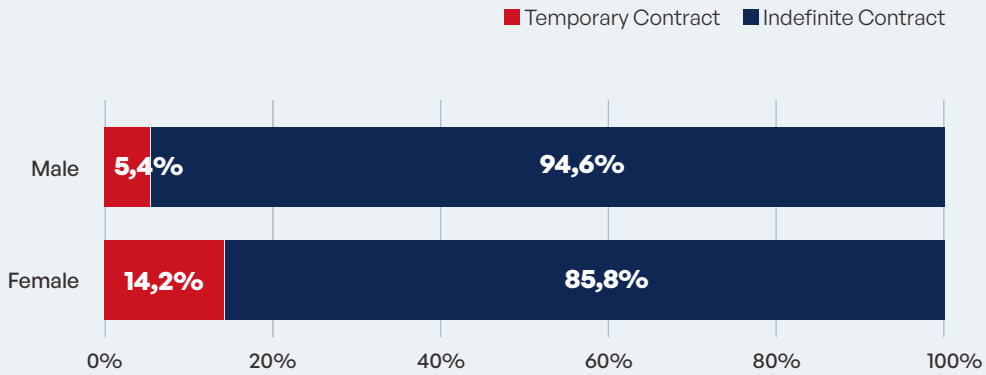
Type of contract – Gender Split

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

Gender	Temporary contract	Indefinite contract	Total
Female	42	254	296
Male	11	191	202
Total	53	445	498

Gender	Temporary contract	Indefinite contract	Total
Female	14,2%	85,8%	100%
Male	5,4%	94,6%	100%

Male - Female division per type of Contract %



Gender Split

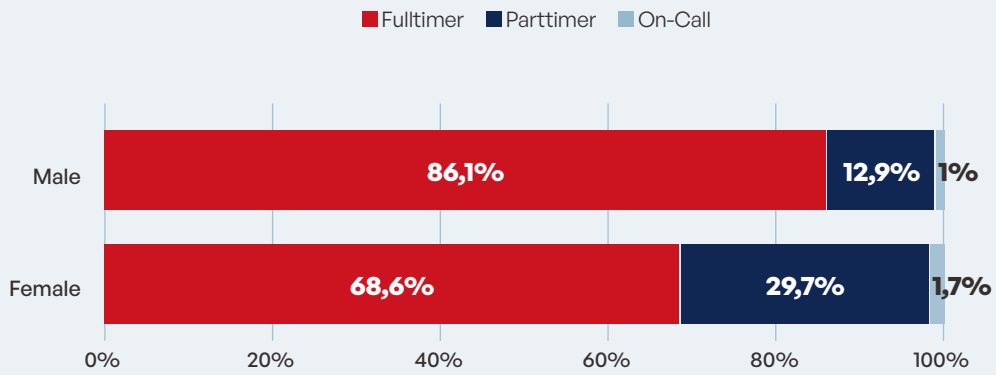
The non-binary employees are added to the smallest group, in this case the male group, to not give any details about their contract details.

Gender	Fulltime	Parttime	On-Call	Total
Female	203	88	5	296
Male	174	26	2	202
Total	377	114	7	498

Type of Employment – Full-time vs. part-time

Gender	Fulltime	Parttime	On-Call	Total
Female	68,6%	29.7%	1,7%	100%
Male	86,1%	12,9%	1,0%	100%

Male - Female division per type of Employment %



E-NPS Engagement

Reduced from +24 on 31 October 2024 to +5 on 31 October 2025

+24 → **+5**

October 2024 to October 2025

E-NPS Health & Wellbeing

Reduced from +6 on 31 October 2024 to -2 on 31 October 2025

+6 → **-2**

October 2024 to October 2025

E-NPS Diversity & Inclusion

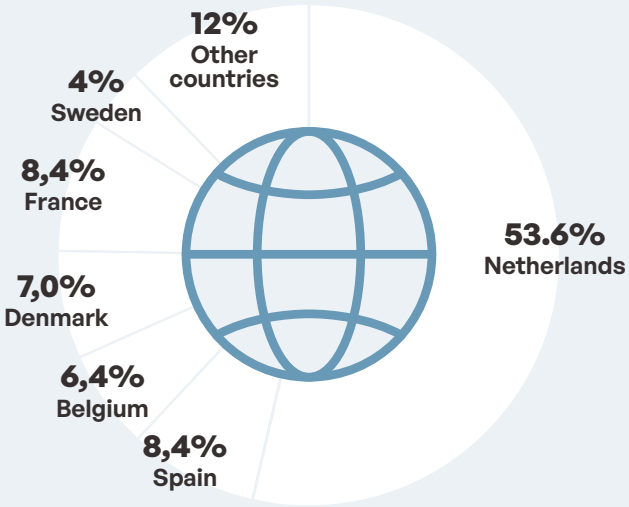
Reduced from +18 on 31 October 2024 to +1 on 31 October 2025

+18 → **+1**

October 2024 to October 2025

Country of birth percentages

Country of birth	Percentage	Headcount
The Netherlands	53,6%	267
France	8,4%	42
Spain	8,4%	42
Denmark	7,0%	35
Belgium	6,4%	32
Sweden	4,0%	29
Other	12,0%	60
Total	100%	498



Employee Turnover Rate

(including customer care, based on internal employees)

12,6%
Voluntary Turnover

8,5%
Involuntary Turnover

21,1%
Turnover

Material topic: Working conditions

Secure Employment
A safe and stable workplace is a key focus area of our sustainability strategy. We invest in long-term employment relationships by offering permanent contracts and clear career paths for all of our employees.

By offering fair and consistent employment conditions, in line with national and international regulations, we ensure that our employees always know what to expect. We also provide modern, ergonomically designed workplaces which incorporate sustainable features to create a safe and supportive environment, both physically and mentally.

Despite these efforts the organisational changes and new ways of working, our employee satisfaction scores have showed a decline due to uncertainty about employment.

In order to support our colleagues through this transition, we promoted our wellbeing initiative, the "Focus on You" programme and increased visibility of the Employee Assistance Programme, offering confidential coaching and mental health support. Leaders initiated follow-up conversations based on employee feedback and we also launched the Fast Forward Culture Crew (FFCC) to encourage belonging, inclusion, and collaboration across hub offices.

Future Actions:
Looking ahead, we will invest in strengthening our employee experience through a pro-active approach in key areas:

- Improve engagement of the employees located across "Hub" offices. Use office visits to understand local needs, gain practical insights and work with local teams on improvements.
- Embed the FFCC agenda into everyday ways of working by rolling out initiatives across three pillars: Culture & Belonging, Sustainability and Social Impact, and Connection & Engagement.
- Build managers' skills through focused training, leadership circles, and follow-up actions based on employee feedback.

Improving transparency of communication around organisational changes, ensuring employees feel informed and supported

Number of Employees under CLA[18]

Category	Countries	Number of employees
Under CLA	NL, BE, FR, ES, AU	430
Not under CLA	DK, SE, CH	68
Total	N/A	498

86% of Sunweb Group employees are covered by a Collective Labour Agreement. Sunweb Group ensures that employees in operating countries with a CLA earn above minimum wage, and with our benchmarking

process, we make sure we remain competitive within the employment market. In operating countries without a CLA, we follow the same salary benchmarking process to ensure competitive salaries for all employees. 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 heard and their concerns are addressed. Bi-weekly surveys among our employees provide valuable insights into increasing employee satisfaction and areas for further improvement.

As part of our commitment to enhance employee benefits, we have introduced a Lease-a-Bike program for our office employees in The Netherlands, Belgium and Sweden, 16 colleagues joined. This employee benefit also promotes sustainable transport options and supports the wellbeing of our employees by encouraging a healthier lifestyle.

[18] CLA: Collective Labour Agreement

Social Dialogue
Social dialogue refers to the structured engagement and communication between an organization and its employees to discuss workplace conditions, and employee rights. Social dialogue promotes transparency and engagement across all offices.

Monthly “Pause” meetings provide company-wide updates on performance and priorities, while our Fast Forward Forum enables daily communication and collaboration across teams, offices and countries. Open feedback sessions with our CEO ensure that colleagues from all offices, not only those at our headquarters can share perspectives and ask questions.

This year also marked the launch of the Fast Forward Culture Crew (FFCC), our “Cross - hub” culture community. Representatives from all offices collaborate to promote belonging and reinforce our shared values. The initiative combines the use of DEIB ambassadors, communication circles and volunteering activities into a single structure with a clear mission.

To fast-forward our culture through real employee feedback, clear goals and shared wins.

The FFCC works across three core focus areas:

- **Culture & Belonging activating** our values in daily work, celebrating achievements and fostering recognition moments
- **Sustainability & Social Impact** supporting DEIB initiatives, volunteering, and purpose-driven activities that connect colleagues to the communities we serve
- **Connection & Engagement** improving communication, strengthening cross-hub collaboration, and creating spaces for feedback and interaction

Through these initiatives, we continue to improve communication across the organisation, ensuring that every colleague has a voice and plays a role in shaping an inclusive and value - driven culture.

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 all employees are part of decision-making processes. The Works Council help to create a supportive work environment that aligns with our sustainability goals. Their involvement contributes to both the environmental and social aspects of our sustainability strategy.

“For the Works Council, for all our colleagues and for me personally, 2025 was an exceptionally challenging year. Saying goodbye to so many valued coworkers deeply affected us all. Throughout this difficult period, we focused on representing employees as best as we could, by listening, supporting, staying connected, and engaging in intensive conversations with the leadership team. Together, we continue to work towards recovery and building a strong, futureproof organisation.”

Vanessa den Hertog
Chair of the Works Council

Material topic: Gender equality and equal pay for work of equal value

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' aims for a future where no gender-based pay differences exist. At Sunweb Group we promote a culture of fairness and trust where every employee is valued based solely on their role and performance.

Our commitment to equal pay helps motivate employees and provides clear and fair career development opportunities for everyone.

The gender distribution in number and percentage at top management level

Job level	Female	Male	Total
All %	59,5%	40,5%	100%
Employee	61,7%	38,3%	100%
Lead	62,2%	37,8%	100%
Head of	28,0%	72,0%	100%
Director	28,6%	71,4%	100%
C-Level	50,0%	50,0%	100%

Gender distribution specifications

The distribution of employees by age group: under 30, 30-50, over 50

Row Labels	Count of Employees	Count of Employees %
Under 30	108	21,7%
30-50	337	67,7%
Over 50	53	10,6%
Grand Total	498	100%

Females in leadership positions (headcount)

Job level	Females 2025	Females 2024
Lead	28	20
Head of	7	9
Director	2	3
Board	2	3
Grand Total	39	34

Other data

Average age of all employees:
37,2

(Unadjusted) Pay Gap between Male and Female Employees according to ESG Report:
27,17%

Gender pay gap
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. Our 2025 unadjusted gender pay gap reflects an unadjusted difference of 27.17% and has remained stable (women earn 72.8% of the male average). This figure, however, does not indicate unequal pay for equal work; instead, it primarily reflects workforce composition differences across job levels and salary groups. The data shows that a higher share of women are represented in the lower salary ranges, while men are disproportionately represented in the upper salary bands and senior leadership positions. For example, while women make up 62.2% of all Leads, their representation decreases significantly at “Head of” (28.0%) and Director level (28.6%), where salary ranges are materially higher, and average pay levels rise accordingly.

These structural differences, across the organisation, rather than unequal pay within identical roles, explain most of the variation in average earnings between women and men. When examining pay within specific salary groups, our analysis shows that salary levels between male and female colleagues are broadly aligned, confirming that the gap is driven by representation patterns rather than unequal pay practices.

Diversity, Equity, Inclusion & Belonging (DEIB)
With the commitment of our Fast Forward Culture Crew, we continuously work to create an environment where everyone feels heard, respected, and empowered. We have integrated DEIB principles across our processes, including inclusive recruitment practices with revised job postings and the inclusion of specific DEIB-related questions in our employee surveys.

DEIB Topics
- **Employee sentiment**
  The satisfaction score for our DEIB initiatives decreased from +18 to +1 as of 31 October 2025, in line with an overall decline in eNPS scores
- **Leadership representation**
  Female representation within (sub)top management (C-level) increased to 50%, up from 40% in the previous year
- **Focus areas to improve DEIB eNPS**
  To strengthen DEIB engagement, we are focusing on measurable actions that enhance belonging, representation, and fairness across our hub offices

DEIB roadmap targets:
- Increase female representation in leadership (+5% year-on-year)
- Improve internal mobility and promotion equity (≥40% of roles filled internally)
- Increase participation in DEIB learning (80% completion rate)
- Reduce the gender pay gap through annual reviews and corrective actions where required

The Fast Forward Culture Crew (FFCC) will be a key driver of progress in this area. With representatives from all offices, the FFCC will collect employee insights. Identify practical and easy-to-implement improvements to culture and inclusion and create impact through tailored initiatives.

FFCC KPIs include:
- Quarterly hub office insights reports
- Three culture-improvement pilots per year
- Minimum of 70% colleague participation in FFCC-led activities

Through this bottom-up approach, we aim to turn inclusion from intention into daily reality for everyone at Sunweb Group.

Other relevant topics

After conducting our Double Materiality Analysis, several important topics to our business were deemed non - material, however this does not mean that these topics are not relevant to our organisation. In this section we highlight several key topics:

- Empowering leadership
- Wellbeing initiatives - Empowr
- Sustainability education & training
- LinkedIn learning
- Diversity in our sustainability communication

Empowering Leadership

Strong leadership is the backbone of a healthy organisational culture. We continued our Empowering leadership program, in which 16 leaders improved their skills through practical learning sessions, international off-site events and leadership bootcamps.

This continuous investment in leadership highlights our commitment to nurturing a culture of growth and excellence across the organisation.

We also trained a group of 10 high-performing individuals with bespoke training sessions and sales and communication development training for approximately 60 employees.

Wellbeing Initiatives - Empowr

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 Empowr.nl, 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 education & training

In 2025, we held quarterly online sustainability updates for all employees, each focused on a specific topic such as, climate change, impacts on winter destinations, climate literacy and overtourism. Approximately 250 colleagues joined these sessions, which included ESG updates, guest experts, and interactive quizzes. Our aim was to build a shared ESG knowledge base, so that sustainability becomes part of everyday decision-making. To increase engagement, we often combined these updates with social activities, such as office clean-ups.

In 2025, a one hour introduction on ESG was integrated into our quarterly employee onboarding covering governance topics such as privacy, IT security and integrity. ESG was also included in our winter guide training and will be part of our 2026 summer guide training. We highlighted how guides can contribute, in areas such as animal welfare, Travelife certification, integrity, privacy and IT security.

We also delivered a greenwashing awareness training session for approximately 20 content and marketing colleagues, focusing on transparent communication and upcoming legislation such as the Empowering Consumers for the Green Transition Directive.

Finally, we organised three Green Key training sessions for purchasing teams and product managers. The sessions covered: the basics of certification, standards, processes and benefits. The sessions aim to equip teams to confidently engage partners and support our certification goals.

LinkedIn learning

Through LinkedIn learning, our employees have access to a large 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 encourage curiosity ensuring that our people are equipped with the knowledge and tools to build a sustainable future, both for themselves and for Sunweb Group.

Diversity in our sustainability communications
We believe that holidays are for everyone, which is why we are committed to representing the diversity of our customers across all our source 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 will remain an ongoing part of how we operate and evolve as a brand.

Affected communities

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 in destinations can put a strain on local infrastructure, increase emissions and create more waste. To mitigate these negative impacts we encourage our transport, accommodation and destination partners to become sustainably certified. In 2024, we agreed to work with Green Key, with the aim of making sustainable certification easier for all our partners.

Travelife certification
Travelife is a sustainability label that provides ESG criteria in the areas of energy efficiency, waste and water management, human rights and social impact.

In September 2025, we successfully passed our third audit and renewed our Travelife Certified status for the second time. Through this certification, we strive to set an example and inspire our partners to become sustainably certified. The recertification process occurs every two years and will take place in 2027.

Travelife has signed a commitment to the British ABTA to achieve accreditation by the end of 2026 from a national accreditation body that is a member of the International Accreditation Forum (IAF).

Socio-economic impact
Protecting the authenticity of local culture is important for the tourist industry. It is important to offer our customers a genuine visitor experience. Moreover, 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 shift to local employment
In 2025, we continued to evolve how we operate our in-destination customer service. By employing more local guides already based in the destination and strengthening our service with Digital Guides, we further reduced the number of seasonal employees travelling from source markets to our destinations.

The shift began in August 2024 and in 2025 we almost doubled the amount of local employment opportunities, with approximately 73% of our guides employed directly in the local destination. All locally hired guides completed full Sunweb training to ensure consistent service quality.

Our Digital Guides provide personal support to customers online and by phone, directly from our offices. The shift towards locally based teams also contributed to a substantial reduction in employee travel. In 2025, only 19% of our guides travelled to destinations, compared with 58% in 2024.

This shift in employment strategy reduces travel requirements, supports local communities through increased job opportunities, eases pressure on local housing, and ensures we continue to deliver excellent service to our customers.

Child labour due dilligence and transparency
Based on the Swiss Code of Obligations (art. 964j–964l CO) and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO), Sunweb Group has taken measures to make our supply chain due diligence processes transparent.

We fall under the DDTrO because we operate in areas for which there may be a reasonable suspicion of child labour in the chain. According to the Children's Rights in the Workplace Index, issued by UNICEF, these areas currently include Bulgaria, Egypt, Greece, Morocco, Tunisia and Turkey.

Our internal Supply Chain Policy, (among other things) explicitly contains a ban on child labour. This policy is currently drafted and expected to be launched around April 2026. This policy will be disclosed to all employees of Sunweb Group and all suppliers of Sunweb Group. Since September 2025, the ban on child labour and the obligation to report has been part of our general purchasing conditions.

We assess the risks based on the UNICEF Child Labour Index, supplier assessments, on-site visits and Speak-Up reports. To date, Sunweb Group has no direct indications of actual child labour, furthermore, in 2025 we did not receive any reports on this topic via our internal speak-up procedure. Any reports (and measures taken) will be kept in a register. Our policy is evaluated annually within the Sustainability team meeting.

Preparing local community projects & volunteering
To achieve our strategic goal of supporting local communities, we began the process of identifying projects that would create a positive impact both in our destinations and source market communities. We conducted a thorough internal review, gathering ideas and advice from a broad cross-section of stakeholders across the business. To evaluate the potential initiatives objectively, we applied the Reach, Impact, Confidence and Effort (RICE) framework, enabling us to shortlist the most impactful initiatives. The final selection was then approved by the Board.
As a result, we selected the following initiatives:

- **A volunteering scheme** for offices and winter destinations, enabling employees to participate in local community cleanup activities.
- **A collaboration with our Cretan DMC and the local university in Crete** to support education and career opportunities within the tourism sector.
- **Increased support for the Dutch charity Reis met je Hart**, which provides holidays across Europe for disadvantaged families.

Volunteering Scheme
Throughout the year five clean ups were organised across our offices in France, Belgium, The Netherlands and Denmark. We invited all of our colleagues to join, with the aim of keeping our local office surroundings clean and tidy.

In September, we also began preparing the next development of the clean ups project, by building relations with three of our key ski destinations we created a plan to start collaborative clean up events in the French Alps. Four events are planned from Dec 2025 onwards.

Cretan Collaboration
We want to contribute to local communities and make a positive contribution in the destinations where we have the most impact. As one of our key destinations, Crete was an obvious choice for this initiative. Demand for labour in the tourism sector is rising and to ensure the destination is well positioned to meet future needs, we have formed a collaboration with Cretan Holidays and the Hellenic Mediterranean University.

Together, we have created an action plan to support the local tourism industry by promoting the value of working in tourism and supporting career paths for the next generation. In 2025 a memorandum of understanding was signed committing to focus on 4 pillars:

- **Enhancing higher education** through lectures, seminars, internships and professional experience opportunities for students
- **Research and Knowledge Transfer**, jointly developing applied research initiatives and promoting knowledge transfer
- **Social Impact**, implementing development of socially impactful actions at local and regional level.
- **Networking and communicating** by creating joint initiatives at national and international level.

Reis met je Hart
We proudly support Reis met je Hart, a charity that gives families who would otherwise be unable to afford a holiday, the chance to experience the joy and positive impact of travelling together. In partnership with our local suppliers, we organised two trips, in Austria and Turkey, for a total of 31 participants, providing accommodation, transport and onsite support.

We help create unforgettable memories for families who find themselves in challenging circumstances. Children have the chance to discover new places and build confidence through new experiences, while parents connect with others who share similar situations, forming supportive, lasting relationships.

This collaboration truly makes a difference, it brings people together, creates lifelong memories, and gives families a well-deserved break surrounded by nature, care and community.

"For many of the families we support, a holiday is far from a given. Thanks to our partnership with Sunweb, we can offer them moments of rest, joy and connection. The impact goes far beyond a holiday: it sets people in motion – not only towards a new place, but towards a renewed sense of strength, connection and self-worth. And that may well be the most meaningful journey of all."

Mila Emonds
Director Stichting Reis met je Hart

Consumers and end-user

Material topics:
- Cybersecurity & data privacy
- Access to (quality) information
- Customer service & satisfaction

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. We continue to improve cybersecurity at Sunweb Group through initiatives designed to support our governance approach, protect stakeholder data and increase our resilience against cyber-attacks.

Adopting an AI Policy
The adoption of Artificial Intelligence technologies introduces new dimensions of risk to a business, including, model misuse, data leakage, algorithmic bias and unclear accountability for machine-driven decisions. To address these challenges, we have implemented a new AI policy to establish mandatory requirements for responsible, secure, and ethical use of AI across the organisation.

Key elements of the policy include:
- Responsible usage of AI services
- Onboarding new AI services
- Integrating AI services into existing solutions

Cyber Security and Data Protection Awareness and Training
Tricking employees, into giving away information, (Social engineering) is a common type of cyber-attack and poses a serious risk to data security and privacy.

To better protect our employees, customers, and partners, the security and data protection team, supported by the executive team, has launched a comprehensive security awareness campaign focusing on building a security-first mindset.

Key elements include:
- Published articles on how to identify and report phishing emails
- Scheduled multiple phishing simulation campaigns, where we have observed an increased trend in people being able to identify and report suspicious emails
- Assigned cybersecurity and data protection training to all employees with an attendance rate of 76%

Our investment in cybersecurity and data protection awareness has made employees more confident in reporting potential threats. During cybersecurity and data protection incidents, employees have become quicker at recognising suspicious activity and reporting it to the security team, enabling the security team to respond faster and ultimately reduce the impact on business operations.

24/7 Security Incident Monitoring and Response
Sunweb Group has strengthened its security operations by onboarding a Managed Detection and Response (MDR) partner to provide 24/7 monitoring and support. This partnership ensures continuous triage and analysis of security incidents, enabling faster detection, timely escalation and a more effective response to potential threats.

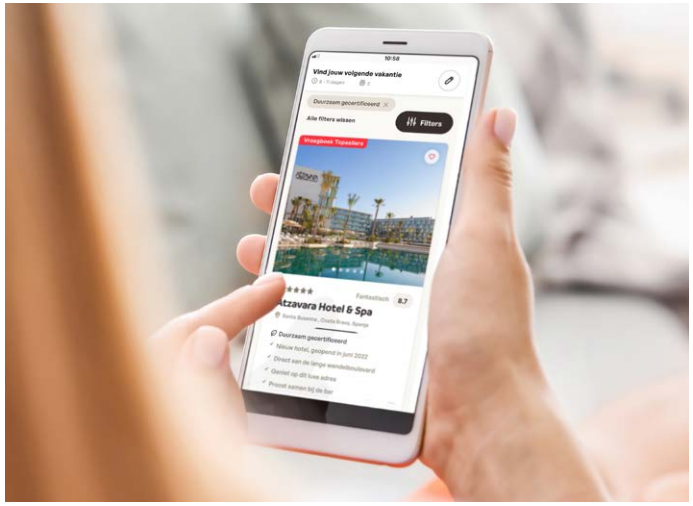
Automation of GDPR requests
During 2025, we completed the IT implementation of our, “GDPR Orchestrator”, a system that automatically retrieves and deletes all personal data of an individual upon request. In previous years, we had to manually collect or delete personal data from all systems, however the GDPR Orchestrator now performs these actions automatically. This reduces the possibility of human error and automatically informs the customer about the progress, ensuring that we complete each request in time.

Continuous Risk Evaluation Through Assessments and Lessons Learned

We recognise that effective risk management is an ongoing process. We therefore continue to improve our cybersecurity by regularly evaluating cyber risks through structured risk assessments, ensuring that emerging threats and vulnerabilities are identified early. We analyse insights from cybersecurity incidents and used the lessons learned to help us focus on the highest risks and improve our security measures.

After a cyber incident affecting one of our back-office portals, we have also launched a project to improve security controls and modernise the technology used across our internal systems.

With regard to managing access within the business, we carried out a comprehensive review of our identity services and administrative accounts, ensuring we have clear visibility of who has privileged access across the organisation. As a result, we have streamlined and restricted privilege access to the lowest level, minimising our exposure to misuse and compromise, making our systems more secure.



As part of our environmental, social and governance strategy, we are 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.

Material topic: Access to (quality) information

We understand that providing accurate, reliable and transparent travel information is critical for customers to make informed decisions. Keeping customers updated on travel restrictions, health guidelines and destination risks is also paramount for their wellbeing and safety.

However, how we communicate with our customers is much larger topic for us. To ensure all customer communications are accurate and reliable, we proactively align with relevant legislation. In 2025 we have made significant improvements, particularly in the areas of accessibility and sustainable holiday choices.

> Clear and reliable information is a fundamental basis for trust in e-commerce. It is essential for consumers to be able to make well-informed choices online and to know exactly what to expect, especially when making a purchase such as a holiday. Sunweb Group has demonstrated for many years that it takes this responsibility seriously through its membership of Thuiswinkel.org and its Thuiswinkel Waarborg and Shopping Secure certifications. These certifications are only awarded following an independent assessment covering, among other things, compliance with laws and regulations, security, and financial reliability, followed by annual recertification. Consumers can therefore rely on clear and transparent information about products and services, a secure payment environment, careful handling of personal data, and an accessible complaints procedure. At Thuiswinkel.org, we believe that sustainable online growth is only possible when trust is built consistently over time. Access to high-quality information and strong compliance plays a key role in this.

Marlene ten Ham
General Directeur Thuiswinkel.org

Sustainability communication
Last year, we improved our Sustainability information on sunwebgroup.com by adding clearer and more comprehensive information including, our ESG targets, key initiatives, partnerships and direct links to our sustainability reports. To improve accessibility, all local websites now introduce sustainability in the local language and link directly to our group sustainability page.

To support regular and consistent communication, we also developed a 2025 sustainability communication calendar. Our main priorities were communicating progress on our ESG targets, promoting the new sustainability search filter and highlighting our partnerships. Throughout the year, we also communicated relevant sustainably focused events, such as EU Data Protection Day and International Pink Day.

Preparations for European Accessibility Act
As we aim 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 means, those with, visual or hearing impairments, colour blindness, low literacy or dyslexia will be able to access our websites and apps more easily.

As a business we are required to comply with the Web Content Accessibility Guidelines (WCAG) under the European Accessibility Act. Beyond compliance, we also recognise the value of making our digital platforms accessible for all customers. In the Netherlands alone, around 32% of the population live with impairments, limitations or disabilities. A clear and well-designed website benefits everyone, regardless of ability.

Timeline of digital accessibility actions
- 2024 Preparation phase
  - A dedicated project team was set up to prepare for the European Accessibility Act, ahead of its entry into force on 28 June 2025
  - Initial scoping and planning activities were carried out to assess readiness
- 2025 Implementation and progress
  - An accessibility statement was published on our websites and apps
  - A status report was submitted to the Dutch Authority for Consumers and Markets (ACM)
  - A consultant conducted quick scans of our websites and audits of our apps
  - Based on the findings, an accessibility roadmap was developed to address identified issues
  - Renewed blogs were made fully digitally accessible
  - A consultant delivered internal training on automated accessibility testing
  - Design teams embedded digital accessibility requirements into all new updates
- 2025 Ongoing improvements
  - The app team completed most of the identified improvement
  - The website team addressed core accessibility issues during dedicated “focus weeks,” improving basic components and rolling these out across most of the websites

In November, we welcomed the Dutch Secretary of State for Long-Term and Social Care, Nicki Pouw-Verweij, to our office. The visit included an accessibility demonstration by our consultant, an overview of app improvements and a constructive discussion on challenges and potential support from the ministry.

Material topic: Customer service and satisfaction

Enhancing customer service and satisfaction, a key to sustainable success

We believe that exceptional customer service and satisfaction are integral to our company strategy, you don't just book with us, you travel with us. As described in the previous chapter, impact on destinations, we have shifted away from bringing our guides from source market countries, to employing more digital and local guides to improve our customer service whilst adopting more sustainable operational practices.

To ensure we continue to meet and exceed our customers' expectations, we have also implemented a comprehensive survey system that captures feedback at various stages of their journey with us.

Survey system overview:

- **Post-booking survey:** focused on the effort required to book a holiday
- **Post-contact survey:** concentrated on customer satisfaction after any interaction with our contact centre and (digital) guide teams
- **Post-holiday survey:** aimed at gauging the likelihood of customers recommending our services to friends and family

Post-holiday survey

The post-holiday survey is sent to the person who booked the holiday, inviting them to share their experiences and recommendations. In 2025, we received survey feedback from 71.992 of our sun customers, 16.734 from Ski and 13.038 from Eliza was here. 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 of our impressive results:

- **Sunweb Sun:** 50% of respondents were promoters, rating us a 9 or 10 on the recommendation scale
- **Sunweb Ski:** 52% of respondents were promoters
- **Eliza was here:** an outstanding 61% 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.

By continuously gathering and acting on customer feedback, we ensure that our services evolve to meet the needs and expectations of our valued customers.

Different feedback & expectations on certified sustainable "Sun" accommodations

We started to research the relationship between eNPS and certified sustainable accommodations. From survey results of approximately 70.000 Sun clients, we noticed that these performed slightly better than non-certified accommodations. The NPS[19] of these certified sustainable Sun accommodations was 0,7% higher than non-certified accommodations. To get more insights on this difference, research was done by reading our Sun customers' feedback over a period of 6 months. From that research, we noticed a difference in expectations between clients who stayed in a certified and clients who stayed in a non-certified accommodation.

For accommodations with a sustainability certificate, the bar is set higher: guests are more lenient in their scores regarding service and atmosphere, but more critical in their scores of rooms, safety & maintenance, and value for money.
For accommodations without a certificate, complaints are more fundamental (hygiene, food, organization & logistics), while positive feedback more often revolves around "good value for money".

The sustainability certificate does not automatically lead to higher satisfaction, but it does lead to different feedback. Sustainable accommodations receive relatively more strategic and quality-oriented feedback, whereas non-sustainable accommodations more frequently report fundamental operational problems. While additional customer research is needed to draw more robust conclusions, these initial insights based on NPS and customer expectations are valuable to share.

[19] NPS (Net Promoter Score) measures customer satisfaction by asking how likely someone is to recommend an organisation on a scale from 0 to 10. The score is calculated by subtracting the percentage of detractors (0–6) from the percentage of promoters (9–10).

Governance

Act Responsibly

Effective governance is the 3rd and final pillar of our ESG Strategy, defined as 'Act Responsibly'. We understand that strong governance practices are essential to build trust with our stakeholders and this part of the report details how Sunweb Group is committed to maintaining a robust governance structure.

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

"Strong governance is essential to our sustainable growth. We operate with integrity, transparency and accountability, ensuring that ethical practices guide every part of our business. By maintaining responsible supplier relationships that align with our ESG policy and complying with regulatory requirements, we reinforce our commitment to sustainable and responsible operations, building a resilient company ready for the future. This foundation enables us to create long-term value and lead by example within the travel industry.

In 2025, we strengthened our governance framework, improving standards for integrity, privacy and security by expanding our policies. A key addition was the introduction of a new AI Policy to support responsible and ethical use of AI across the organisation.
We also introduced a comprehensive ESG Policy that guides how we integrate ESG principles into our operations.

To support awareness and accessibility, we made improvements to training and launched an internal policy portal, making it easier for employees to find and understand the guidelines that support their work.

This year, we also renewed our Travelife Certification, reaffirming our commitment to integrity, compliance, and continuous improvement."

Jeroen de Swart
CFO Sunweb Group

Material topics:

- Corporate culture
- Management with suppliers, including payment practices
- Compliance with regulation

Material topic: Corporate culture

Sunweb Group's core values

Our core values underpin everything we do and guide our daily actions. We ensure our values are consistently communicated to colleagues, starting with onboarding and reinforced through office displays and regular examples shared 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.

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.

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 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.

Integrity Code
We have created an integrity code which sets out rules of conduct for our management, employees and other individuals acting on behalf of Sunweb Group. With this code, we want to promote integrity and ethical conduct by provide clear and transparent guidelines. This includes conduct on fraud, abuse and whistleblowing, conflict of interest, anti-bribery and corruption, anti-trust, anti-money laundering, trade sanctions and confidential information. Employees, receive this training at onboarding and are required to report cases of (suspected) violation of our integrity code 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 an external counsellor or report the incident anonymously. 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

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 act as a role model in the travel industry. This commitment earns the trust of all stakeholders, particularly our customers, suppliers, partners, shareholders, and employees.

As part of our integrity code, we maintain a zero-tolerance policy towards fraud and abuse or bribery and corruption.

Political influence
We are active in several European countries and we frequently engage with legislators and regulators. These interactions are mainly case-driven and take place in the public domain. As part of this our integrity code, bribery of public officials is strictly prohibited

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, REJS, SRF, ABTA, DRV, and APST. Active participation in these associations helps strengthen integrity within the tourism 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.

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

When we refer to “Travel with us” we are often relying on our network of partners, who play a pivotal role in delivering high-quality products and service to our customers. Their knowledge allows us to respond quickly to customers needs in our destinations and supports innovation for future growth. We have built strong relationships with our suppliers which also enables us to work together on community initiatives and create more local employment opportunities.

Payment practices
We value our partnerships and the importance of supporting a healthy local tourism industry. Fair payment terms are way of supporting our partners. The majority of our products are purchased by our Swiss tour operator and we adhere to all applicable Swiss and/or EU rules and regulations.

We are continuously streamlining and digitising our purchasing processes and aim 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, on occasion been granted more flexible payment terms by our partners.

Green Key Partner Programme
In 2025, Green Key was chosen as our preferred partner, as they provide support to accommodations in the countries where we operate. This gives our accommodation partners help and guidance via a local contact and in their own language. By supporting this process, we aim to increase the number of certified accommodation partners by highlighting the benefits of certification for our partners, customers and the travel industry as a whole.

Health & Safety
We have updated our health and safety procedures by adding a clause to our hotel and transfer contracts, requiring our partners to confirm their compliance with our stringent health and safety requirements.

The process began in 2025, and by the end of March 2026, all accommodations are expected to have renewed contracts that include a health and safety annex.

This ensures that all our partners are aligned with our commitment to providing the highest standards of health and safety across all our services.

Material topic: Compliance with regulations

Policies & 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.

ESG policy
In 2025, we created a new ESG policy. Our ESG policy reflects our commitment to responsible tourism and sustainable business practices. It outlines how we integrate ESG principles into our operations, aligning with our mission to shape the future of holidays and our vision to create lifetime wmemories while preserving the planet.

We aim to guide our stakeholders including, employees, partners and customers, towards a more sustainable future, ensuring that our business decisions contribute positively to society and reduce negative impacts on the environment.

Our policy includes our ESG goals, ESG Action Plan for 2030, metrics and KPIs and includes an overview of all ESG related policies. Our policy contains measurement, monitoring and reporting methods, and clearly defines roles and responsibilities within our business.

Data protection policy
We process personal data of customers, employees, business partners and suppliers and we treat 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 (in compliance with the EU's General Data Protection Regulation (GDPR)).

Cyber security policy & AI policy
Protection of our information systems and data is critical to us, our investors, investee companies and regulators. Consequently, we strive to meet or exceed the industry's security best practices standard. Everyone at Sunweb Group plays a role in achieving this goal and is expected to understand their responsibility in maintaining 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.

In 2025, we have also implemented an AI policy to establish mandatory requirements for responsible, secure and ethical use of AI across the organisation.

Policies portal
We created a dedicated page on our intranet, to publish and store all our company policies in one place, covering topics such as, integrity, security, data protection, sustainability and workplace standards.

We believe that clear policies help us build trust with employees, partners and customers. They also ensure we are legally compliant and promote the use of industry standards. This helps all employees to include fairness, safety and sustainability in every decision. All our policies form the foundation of a responsible company.

Risk management
Strategic, financial and operational risks are an inherent part of our business and are managed via regular risk reviews, using a risk heatmap. As part of our performance management, we monitor the developments of capacity, sales speed, margins and expenses daily. Using this analysis, we take the required measurements to adjust the relevant items, monitoring their results and the effects on our financial position.

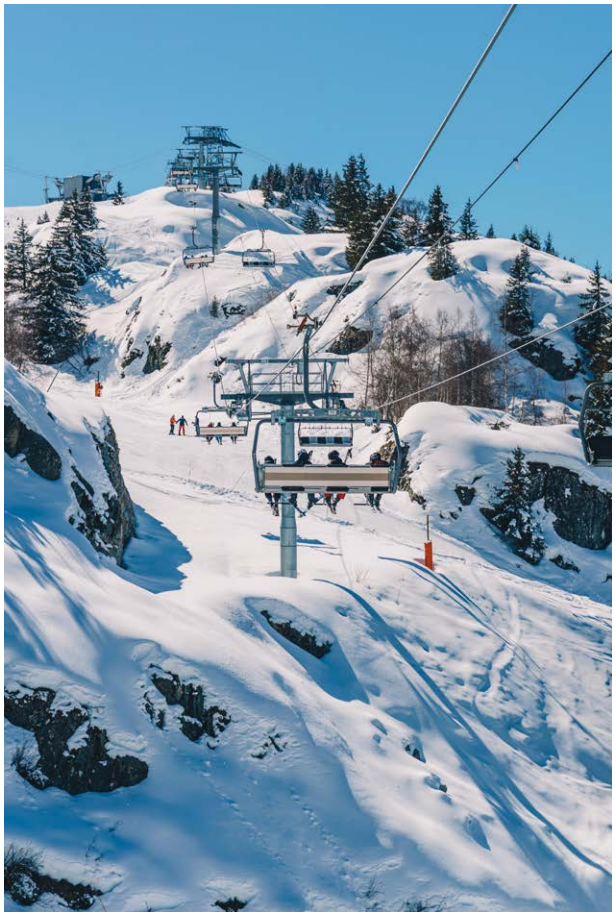
As risk profiles change, monitoring, processes, and systems are adjusted accordingly, ensuring we can continuously control our overall risk profile. When detecting opportunities in the market, we are able to quickly and appropriately respond, integrating any risks into our risk control process and systems. Where necessary, this includes direct actions such as renegotiating contracts.

We continuously improve our processes and systems in an agile way. This provides better insights and enables faster responses. These actions support improved margins, occupancy rates and overall results. Managing risk is constant, as external factors have a direct impact on our operations.

Legislation
Despite growing pushback against the burden of increasing administrative tasks, new or amended legislation continued in 2025 at both EU and national level. We find many of the new laws include reporting obligations on travellers', suppliers' or employees' data. As such, any legislative changes require diligent review and subsequent company-wide implementation, which can impact areas such as IT development and testing of data security measures.

An example of this can be found in the implementation of the technical requirements related to the Spanish Royal Decree 933/2021, where travellers' data need to be provided to the Spanish government on an ongoing basis. We successfully implemented all technical requirements in order to comply.

Examples of current and relevant legislation:
- EU CSRD Omnibus, including the VSME standard
- EU CCD2, including requirements relevant to Buy Now Pay Later services
- EU PSD3, relevant to money transfer services
- EU Package Travel Directive (PTD), linked to our core business
- ETIAS / EES, covering visa and entry obligations for customers
- EU AI Act
- E-invoicing requirements
- EU Pay Transparency Directive, affecting salary policies
- Digital Services Act (DSA), including platform definitions
- EU Accessibility Act
- EU TOMS, related to VAT on travel services
- Empowering Consumers for the Green Transition Directive, restricting environmental claims
- Digital Omnibus, related to data protection
- Additional regulatory information
- National governments issue local implementation laws based on EU legislation
- National and international court rulings also influence the regulatory framework relevant to our business



Other relevant topics

Advertisement restrictions for fossil fuel products
In 2024 a complaint was filed by Foundation Fossil Free Advertisements to the Dutch Advertisement Board (Reclame Code Commissie) claiming that Sunweb's ads for cruise travel should be considered in breach of the advertisement code, as 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.

In another advertising related case, a ban on outdoor advertisements for, among other things flights and holidays came into effect in January 2025 in The Hague, The Netherlands. Such local regulations could have far-reaching consequences if adopted by other authorities. This may significantly restrict our ability to advertise and limit how we communicate 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 enforced the ban as of May 1st, 2025. ANVR has announced that it will not accept the outcome and will initiate legal proceedings on the merits of the case. It is currently assessing its next steps.

Invitation to collaborate and challenge

For Sunweb Group, ensuring a carefree and affordable holiday for our customers is our top priority. We believe that people will always travel, whether to broaden their horizons or simply relax. However, we understand that the travel industry must evolve, therefore offering and making more conscious choices is essential. As one of Europe's largest travel organisations, we are committed to addressing environmental, social and governance issues by engaging and supporting our partners and customers.

We strive to meet consumer needs while making sustainable choices clear and accessible. We adhere to legislation and actively participate in tourism industry developments to ensure we are taking the right actions.

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.

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 Resebransch 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.
		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.

VSME Reporting Annex

Basic module - General information

VSME code	VSME Sub code	VSME description	Comment	Reference
B1. Basis for preparation	24a.	Disclose which option has been selected for reporting: - OPTION A: Basic Module - OPTION B: Basic Module and Comprehensive Module	Option B	N/A
B1. Basis for preparation	24b.	If applicable, disclose the data points that are not reported as it is deemed classified or sensitive information	N/A	N/A
B1. Basis for preparation	24c.	Is the sustainability report prepared on an individual basis or on a consolidated basis?	Consolidated basis	N/A
B1. Basis for preparation	24d.	In case of a consolidated sustainability report, list of subsidiaries including registered address	–	Annex - subsidiaries
B1. Basis for preparation	24.e.i.	Undertaking's legal form	B.V.	–
B1. Basis for preparation	24.e.ii.	NACE sector classification code(s)	N79 - Travel agency, tour operator and other reservation service and related activities	–
B1. Basis for preparation	24.e.iii.	Size of balance sheet (in Euro);	EUR 512 million (2024: EUR 505 million)	–
B1. Basis for preparation	24e.iv.	Turnover (in Euro)	EUR 1,174 million (2024: EUR 1,133 million)	–
B1. Basis for preparation	24.e.v.	Number of employees in headcount or full-time equivalents	–	Section Social
B1. Basis for preparation	24.e.vi.	Country of primary operations and location of significant asset(s) (addresses from all locations)	–	Section Our Business
B1. Basis for preparation	24.e.vii.	Geolocation of sites owned, leased or managed	–	Section Our Business
B1. Basis for preparation	25.	When applicable, brief description of sustainability-related certification or label (including the issuers of the certification or label, date and rating score)	–	Section Environment
B2. Practices, policies and future initiatives for transitioning towards a more sustainable economy	26.a.	Explanation if the undertaking has put in place specific practices for transitioning towards a more sustainable economy.	–	Sections Environment / Social / Governance
B2. Practices, policies and future initiatives for transitioning towards a more sustainable economy	26.b.	Explanation if the undertaking has put in place specific policies for transitioning towards a more sustainable economy.	–	Sections Social / Governance
B2. Practices, policies and future initiatives for transitioning towards a more sustainable economy	26.c.	Explanation if the undertaking has put in place specific future initiatives for transitioning towards a more sustainable economy.	–	Sections Environment / Social / Governance
B2. Practices, policies and future initiatives for transitioning towards a more sustainable economy	26.d.	Explanation if the undertaking has put in place specific targets for transitioning towards a more sustainable economy.	–	Sections Environment / Social / Governance

Basic Module – Environment metrics

VSME code	VSME Sub code	VSME description	Comment	Reference
B3. Energy and green house gas emissions	29.	Total electricity consumption in MWh: Renewable + Non-renewable	–	Section Environment
B3. Energy and green house gas emissions	29.	Total fuels consumption in MWh: Renewable + Non-renewable	–	Section Environment
B3. Energy and green house gas emissions	29.	Total energy consumption in MWh: Renewable + Non-renewable	–	Section Environment
B3. Energy and green house gas emissions	30.	Gross GHG emissions (in tons of CO_2 eq)	–	Section Environment
B3. Energy and green house gas emissions	30a.	Scope 1 GHG emissions (in tons of CO_2 eq)	–	Section Environment
B3. Energy and green house gas emissions	30b.	Scope 2 location-based GHG emissions (in tons of CO_2 eq)	–	Section Environment
B3. Energy and green house gas emissions	31.	GHG intensity based on turnover	Total GHG emissions per net revenue (t CO_2e/€): 0,00063 (2024: 0,00067)	–
B4. Pollution of air, water and soil	32.	Disclose the pollutants it emits to air, water and soil in its own operations, with the respective amount for each pollutant.	VSME matter not material to the Company's business	–
B5. Biodiversity	33.	The number and area (in hectares) of sites that the organization owns, that it has leases, or that it manages, that are in or near biodiversity sensitive areas	VSME matter not material to the Company's business	–
B5. Biodiversity	34a.	Total use of land (in hectares)	VSME matter not material to the Company's business	–
B5. Biodiversity	34b.	Total sealed area	VSME matter not material to the Company's business	–
B5. Biodiversity	34c.	Total nature-oriented area on site	VSME matter not material to the Company's business	–
B5. Biodiversity	34d.	Total nature-oriented area off site	VSME matter not material to the Company's business	–
B6. Water	35.	The total amount of water withdrawal	VSME matter not material to the Company's business	–
B6. Water	35.	Total amount of water withdrawn at sites located in areas of high-water stress.	VSME matter not material to the Company's business	–
B6. Water	36.	In case when productions processes are in place, disclose the water consumption calculated as the difference between its water withdrawal and water discharge from its production processes.	VSME matter not material to the Company's business	–
B7. Resource use, circular economy and waste management	37.	The undertaking shall disclose whether it applies circular economy principles and, if so, how it applies these principles.	VSME matter not material to the Company's business	–

VSME code	VSME Sub code	VSME description	Comment	Reference
B7. Resource use, circular economy and waste management	38a.	Total annual generation of waste broken down by type (non-hazardous and hazardous)	VSME matter not material to the Company's business	–
B7. Resource use, circular economy and waste management	38b.	Total annual waste diverted to recycling or reuse	VSME matter not material to the Company's business	–
B7. Resource use, circular economy and waste management	38c.	If the undertaking operates in a sector using significant material flows the annual mass-flow of relevant materials used.	VSME matter not material to the Company's business	–

Basic Module – Social metrics

VSME code	VSME Sub code	VSME description	Comment	Reference
B8. Workforce - General characteristics	39a.	Headcount or FTE per type of employment contract (temporary or permanent)	–	Section Social
B8. Workforce - General characteristics	39b.	Headcount or FTE per gender (female - male)	–	Section Social
B8. Workforce - General characteristics	39c.	Headcount or FTE per country of the employment contract	–	Section Social
B8. Workforce - General characteristics	40.	If company > 50 employees: employee turnover rate	–	Section Social
B9. Workforce - Health and safety	41a.	Number and rate of recordable work-related accidents	VSME matter not material to the Company's business	N/A
B9. Workforce - Health and safety	41b.	Number of fatalities because of work-related injuries and work-related ill-health	VSME matter not material to the Company's business	N/A
B9. Workforce - Health and safety	42a.	Disclose whether the employees receive pay that is equal or above applicable minimum wage for the country it reports in.	–	Section Social
B10. Workforce - Remuneration, collective bargaining and training	42a.	Disclose whether previous disclosure requirement is determined based on national minimum wage or through collective bargaining agreements	–	Section Social
B10. Workforce - Remuneration, collective bargaining and training	42b.	If headcount is above 150 employees disclose the percentage gap in pay between female and male employees.	–	Section Social
B10. Workforce - Remuneration, collective bargaining and training	42c.	The percentage of employees covered by collective bargaining agreements	–	Section Social
B10. Workforce - Remuneration, collective bargaining and training	42d.	Average number of annual training hours per employee, broken down by gender	–	Training hours not measured, but extensively desvcribed in section Social

Basic Module – Governance metrics

VSME code	VSME Sub code	VSME description	Comment	Reference
B11. Convictions and fines for corruption and bribery	43.	In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions, and the total amount of fines incurred for the violation of anti-corruption and anti-bribery laws.	0 convictions and fines in the reporting period	–

Comprehensive Module – General information

VSME code	VSME Sub code	VSME description	Comment	Reference
C1. Strategy: Business Model and Sustainability - Related Initiatives	47a.	Description of significant groups of products and/or services offered	–	Section Our business
C1. Strategy: Business Model and Sustainability - Related Initiatives	47b.	Description of significant market(s) the undertaking operates in	–	Section Our business
C1. Strategy: Business Model and Sustainability - Related Initiatives	47c.	Description of main business relationships	–	Section Our business
C1. Strategy: Business Model and Sustainability - Related Initiatives	47d.	If the strategy has key elements that relate to or affect sustainability issues, a brief description of those key elements.	–	Section Sustainability strategy
C2. Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	48.	If the undertaking has put in place specific practices, policies or future initiatives for transitioning towards a more sustainable economy, which it has already reported under disclosure B2 in the Basic Module, it shall briefly describe them.	–	Sections Environment / Social / Governance
C2. Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	49.	The undertaking may indicate, if any, the most senior level of the undertaking accountable for implementing them.	–	Section Sustainability strategy

Comprehensive Module – Environmental metrics

VSME code	VSME Sub code	VSME description	Comment	Reference
C3. GHG reduction tar gets and climate transition	54a.	Target year and target year value	–	Section Environment
C3. GHG reduction tar gets and climate transition	54b.	The base year and base year value	–	Section Environment
C3. GHG reduction tar gets and climate transition	54c.	The units used for targets	–	Section Environment
C3. GHG reduction tar gets and climate transition	54d.	The share of the Scope 1, Scope 2 and, if disclosed, Scope 3 that the target concerns	–	Section Environment
C3. GHG reduction tar gets and climate transition	54e.	List of main actions it seeks to implement to achieve its targets.	Short term targets need to be set in line with SBTi	Section Environment
C3. GHG reduction tar gets and climate transition	55.	If active in high impact sector (NACE) and you already have a transition plan for climate change mitigation. How are you contributing to reduce GHG emissions?	N/A	–
C3. GHG reduction tar gets and climate transition	56.	If active in high impact sector (NACE), but no transition plan is yet in place, when will the plan be adopted?	N/A	–
C4. Climate risks	57.	If climate related transition events or climate related hazards are identified describe the hazards/events.	VSME matter not material to the Company's business	–
C4. Climate risks	57a.	If climate related transition events or climate related hazards are identified disclose how it has assessed the exposure and sensitivity of its assets, activities and value chain to these hazards and transition events.	VSME matter not material to the Company's business	–
C4. Climate risks	57b.	If climate related transition events or climate related hazards are identified disclose the time horizons of any climate-re lated hazards and transition events identified.	VSME matter not material to the Company's business	–
C4. Climate risks	57c.	If climate related transition events or climate related hazards are identified disclose whether it has undertaken climate change adaptation actions for any climate-related hazards and transition events.	VSME matter not material to the Company's business	–
C4. Climate risks	58.	Potential adverse effect of physical risk, that may affect its financial performance or business operations in the short, medi um or long term, with an indication as to whether the undertaking assesses that the risk is high/ medium/low.	VSME matter not material to the Company's business	–

Comprehensive Module – Social metrics

VSME code	VSME Sub code	VSME description	Comment	Reference
C5. Additional (general) workforce characteristics	59.	If > 50 employees: female-to-male ratio at management level	–	Section Social
C5. Additional (general) workforce characteristics	60.	If > 50 employees: number of self-employed without personnel that are working exclusively for the undertaking and tem porary workers primarily engaged in “employment activities”	–	Section Social
C6. Additional own workforce information - Human rights policies and processes	61a.	Does the undertaking have a code of conduct or human rights policy for its own workforce? (YES/NO)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.i.	If yes, does this cover: Child labour (Yes/No)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.ii.	If yes, does this cover: Forced labour (Yes/No)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.iii.	If yes, does this cover: Human trafficking (Yes/No)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.iv.	If yes, does this cover: Discrimination (Yes/No)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.v.	If yes, does this cover: Accident prevention (Yes/No)	Yes	Section Social
C6. Additional own workforce information - Human rights policies and processes	61b.vi.	If yes, does this cover: Other (Yes/no - if yes, specify)	N/A	Section Social
C6. Additional own workforce information - Human rights policies and processes	61c.	Is there a complaint handling mechanism for its own workforce? (Yes/No)	Yes	Section Social
C7. Severe negative human rights incidents	62a.i.	Are there any confirmed incidents related to Child labour (Yes/No)	No	–
C7. Severe negative human rights incidents	62a.ii.	Are there any confirmed incidents related to Forced labour (Yes/No)	No	–
C7. Severe negative human rights incidents	62a.iii.	Are there any confirmed incidents related to Human trafficking (Yes/No)	No	–
C7. Severe negative human rights incidents	62a.vi.	Are there any confirmed incidents related to Discrimination (Yes/No)	No	–
C7. Severe negative human rights incidents	62a.v.	Other? (Yes/No - if yes, specify)	N/A	–
C7. Severe negative human rights incidents	62b.	If yes, describe actions being taken to address these incidents	N/A	–
C7. Severe negative human rights incidents	62c.	Is the undertaking aware of any confirmed incidents in workers in the value chain, affected communities, consumers and end-users? If so, explain.	N/A	–

VSME code	VSME Sub code	VSME description	Comment	Reference
C8. Revenues from cer tain sectors and exclusion from EU reference benchmarks	63a.	If active in this sector: revenues from controversial weapons	VSME matter not material to the Company's business	–
C8. Revenues from cer tain sectors and exclusion from EU reference benchmarks	63b.	If active in this sector: revenues from cultivation and production of tobacco	VSME matter not material to the Company's business	–
C8. Revenues from cer tain sectors and exclusion from EU reference benchmarks	63c.	If active in this sector: revenues from fossil fuel, including a disaggregation of revenues derived from coal, oil and gas	VSME matter not material to the Company's business	–
C8. Revenues from cer tain sectors and exclusion from EU reference benchmarks	63d.	If active in this sector: revenues from chemicals production	VSME matter not material to the Company's business	–
C8. Revenues from cer tain sectors and exclusion from EU reference benchmarks	64.	The undertaking shall disclose whether it is excluded from any EU reference benchmarks that are aligned with the Paris Agreement.	VSME matter not material to the Company's business	–
C9. Gender diversity ratio in the governance body	65.	If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	–	Section Social

Annex - subsidiaries

Name	Principal activities	Country of incorporation	% Equity interest 2025	% Equity interest 2024
Holiday Holding Rotterdam B.V.	Travel industry	Netherlands	100%	100%
Rotterdam Leisure Holding B.V.	Travel industry	Netherlands	100%	100%
Sunweb Group SSC B.V.	Travel industry	Netherlands	100%	100%
Sunweb Group Netherlands B.V.	Travel industry	Netherlands	100%	100%
Sunweb Group GmbH	Travel industry	Switzerland	100%	100%
Sunweb Group Holding B.V.	Travel industry	Netherlands	100%	100%
Leisure Support Services Belgium N.V.	Travel industry	Belgium	100%	100%
Sunweb Vacaciones SL	Travel industry	Spain	100%	100%
Sunweb Group Germany GmbH (in liquidation)	Travel industry	Germany	100%	100%
Sunweb Holding France SARL	Travel industry	France	100%	100%
S.D.P. SARL	Travel industry	France	100%	100%
Sunweb Group France SARL	Travel industry	France	100%	100%
Sunweb Group Scandinavia A/S	Travel industry	Denmark	100%	100%
Sundio Sweden AB	Travel industry	Sweden	0%	100%
Sunweb Group UK Ltd	Travel industry	United Kingdom	100%	100%
Leisure Support Services Sweden AB	Travel industry	Sweden	100%	100%

Sunweb Group

Lifetime memories