

Supplier

# CODE OF CONDUCT

# A Message from Our Head of Procurement

At Skyscanner, we believe that how we achieve results is just as important as the results themselves. Our suppliers are an important part in helping us deliver high-quality products to our travellers and partners, and we are committed to working with those who share our values of integrity, transparency, and respect for people and the planet.

This Supplier Code of Conduct sets out the ethical, social, and environmental standards we expect from all third-party suppliers and contractors. It reflects our belief in responsible sourcing, sustainable business practices, and mutual accountability. It's here to guide our decisions, empower our actions, and protect the integrity of everything we do. That's how we achieve Skyscanner's vision to become the world's number one travel ally.

We recognise that strong, ethical relationships are the foundation of resilient supply chains. That's why we seek to collaborate with suppliers who are not only compliant, but also proactive in driving continuous improvement and positive impact in the communities where we operate.

Thank you for your partnership and for upholding the standards that protect our travellers, our brand, and the future we're building together.



**Gary Wright**  
Head of Procurement  
Skyscanner



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# Living *our values*

At Skyscanner we operate with integrity and transparency in all our business decisions. Guided by our vision, mission and values, we are mindful of our responsibilities and our potential impact on our travellers, partners, suppliers and the public.

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## About Skyscanner

Skyscanner was founded in the early 2000s, with the single aim of making travel search simple. An idea between three friends, scribbled on a pub beer mat, grew into the market-leading travel search company we are today. Now we connect millions of travellers across the world to over 1,200 trusted travel partners to find the best flight, hotel or car hire options.

Reaching millions of travellers every day means we have a lot of responsibility, but also an opportunity to make a long-term positive impact. We have committed to acting with the highest ethical standards that go beyond merely complying with relevant laws, as well as set ourselves ambitious goals in our areas of focus (Accessibility, Charities, DEI and Sustainability). We know we can only achieve our goals and standards by working in partnership with you, our valued suppliers.

We look to ensure that all our business activities are conducted with fairness and integrity and in compliance with local laws and regulations. We seek to work with suppliers who share a common vision and commitment to us.





# Our Vision

To become the world's number one travel ally.

# Our Mission

We're on a mission to help travellers plan and book their trip with ease and confidence. Whether it's using technology to make the complex simple or connecting travellers with trusted partners to provide honest and transparent solutions, we're determined to help everyone find the best offer for them.



# Our Values

At Skyscanner, our values mean the world to us. They've been pivotal in building our unique culture and global success.

## **We think traveller first**

We love to travel – this is what unites us. It's the reason we think traveller first, partner second and Skyscanner third.

## **We learn, share and grow**

Our people's diversity is our superpower. Different skills, experiences and backgrounds help us develop as individuals, as well as a business and industry.

## **We care, always**

We treat each other with empathy and respect because that's how we'll achieve great things together.

## **We make it simple**

We've done this since day one. We look for simple and smart ways to work together and build things that will make travel easy and accessible for everyone.

## **We get it done, together**

Our ambition drives us every day. When we see an opportunity to make things better, we go after it and get it right, not being afraid to learn as we go.



## About this Code

Corporate integrity, the safety and wellbeing of workers across our global supply chain and making a positive impact in the world are of paramount importance to Skyscanner.

In this Supplier Code of Conduct (“Code”) a ‘Supplier’ (“you”) refers to any individual or business that provides us with products or services, including all their employees, agents and sub-contractors. We ask that all our suppliers review this Code carefully and ensure that they and their employees and any of their own agents and sub-contractors involved in Skyscanner’s supply chain are also aware of the principles and expectations and are committed to complying with them.

In carrying out an agreement with Skyscanner as one of our suppliers, you agree that you will comply with the standards detailed in this Code and all applicable laws and regulations where you operate.

This Code supplements, but does not supersede, any contractual agreement you may have with us. If there is a conflict between any applicable laws or regulations, the contract between us, and this Code, we expect you to meet the most stringent applicable standard. Where this Code requires obligations beyond applicable laws, we expect you to follow the Code’s expectations within the bounds of applicable laws.

**We seek to do business with those who adhere to our vision, commitments and expectations around:**

### Conducting business with integrity

- Preventing and fighting bribery and corruption
- Compliance with international sanctions
- Fair competition and collaboration
- Instilling responsible data practices
- Preventing security risks

### Worker rights and wellbeing

- Respecting human rights
- Keeping a safe and healthy environment

### Making a positive impact

- Building accessibly
- Fostering diversity, equity and inclusion
- Protecting our planet





## Supplier Self-Monitoring

We expect you to monitor your own compliance with this Code and to report any violations (actual or suspected) of it as soon as possible and without delay to the Skyscanner Procurement team via email at [procurement@skyscanner.net](mailto:procurement@skyscanner.net).

You must never retaliate, take disciplinary action against or terminate any worker that has, in good faith, reported violations of this Code or questionable conduct, or who has sought advice regarding this Code.

## Remediation

We recognise that some issues are difficult to resolve and so encourage our suppliers to share their challenges with us in a transparent way. We acknowledge that different businesses have differing levels of resource, and we will bear that in mind and be reasonable when looking at compliance with this Code.

Our intention is always to support you if you show genuine commitment to improve. However, if you demonstrate continued failure to implement agreed corrective actions, or if non-compliances are of a grave character, Skyscanner may end our business relationship with you. In serious cases, we may need to disclose violations to appropriate authorities and/or pursue legal remedies.

## Changes to this Code

Skyscanner has the right to modify this Code from time to time at its discretion on giving you at least 30 days' notice in writing, which includes email.



# Conducting business *with integrity*

Our approach to business ethics is rooted in always acting with integrity. We expect our suppliers to uphold the highest ethical standards and conduct their business in compliance with applicable laws and regulations, ensuring a culture of trust and integrity throughout the supply chain.

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# Preventing and Fighting Bribery and Corruption

## Our Vision and Commitment

Skyscanner operates a zero-tolerance approach to bribery and corruption. We look to act professionally, fairly and with integrity in all our business dealings and relationships, wherever we are operating in the world, avoiding even the appearance of impropriety.

We are committed to acting in line with our obligations under the UK's Bribery Act 2010, the US's Foreign Corrupt Practices Act 1977 and all other anti-bribery and anti-corruption laws in the countries in which we operate.

## Our Expectations

We expect you to operate lawfully, ethically, with integrity and in accordance with our [Anti-Bribery Code of Conduct](#).

Policies and procedures to prevent bribery and corruption should be established and reviewed regularly to ensure they operate effectively.





## Compliance with International Sanctions

### Our Vision and Commitment

Governments around the world may impose restrictions which impact Skyscanner's ability to do business in any given country, or with certain companies or named individuals. Skyscanner will not do business with companies or individuals that appear on United Nations or other sanctions watchlists. We screen all those we do business with against international sanctions watchlists.

### Our Expectations

We expect you to comply with international sanctions or restrictions when doing business around the world. You will ensure that any subcontractors or third parties you rely on to provide goods or services to Skyscanner are properly vetted against international sanctions watchlists.

## Fair Competition and Collaboration

### Our Vision and Commitment

Skyscanner is committed to fair competition. Growing our business in a way which improves choice and prices for travellers is essential to our overall vision and mission. We do not make agreements (formal or informal) that lead to illegal restriction or distortion of competition under competition and antitrust laws.

### Our Expectations

We expect you to comply with all applicable competition and antitrust laws, including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids. You will never share with Skyscanner commercially sensitive information on its competitors or your own, including but not limited to, future prices, margins, sales practices, markets shares, sources of supply and certain customers.



# Instilling Responsible Data Practices

## Our Vision and Commitment

At Skyscanner, we take data protection very seriously. We build trust with our travellers, employees, partners, suppliers and the public by ensuring that we use personal data transparently, fairly, and in line with applicable data protection laws. We aim to comply with all data protection laws, processes and standards.

## Our Expectations

Proper use and protection of our data is critical to our commercial success. To help us maintain the trust we've built, we expect you to take privacy seriously too.

This means that we expect you to (to the extent applicable to you and your services):

1. Comply with applicable laws and regulations when handling data.
2. Establish and document policies and procedures to ensure that applicable privacy and data protection requirements can be complied with in practice.
3. Notify us immediately if anything affects the confidentiality, integrity or availability of Skyscanner personal information (e.g. unlawful destruction, loss, alteration, unauthorised disclosure or access) or if you become aware of a data breach.





## Preventing Security Risks

### Our Vision and Commitment

Similarly to data protection, the security of our information technology systems is vital to us maintaining trust. We take very seriously our role in helping our business to protect personal data and financial transactions. We want to make the digital space safer and more trustworthy for all travellers.

### Our Expectations

We expect you to maintain and apply security organisational and technical measures and ensure appropriate safeguards, along with protecting the integrity and availability of the products or services being provided.

We expect you to develop and implement appropriate business continuity plans, covering operations that support Skyscanner, to minimise the impact of disruption or disaster. This includes you having access controls and identity management in place, you encrypting data when it's being transmitted and when it's in storage, and you auditing for vulnerabilities in your data security and fixing issues when they're identified.



# Working well & being accountable to each other

Skyscanner believes we all have a responsibility to respect human rights and to avoid complicity in human rights abuses. We also expect the health and safety of workers to be protected at all times.

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# Respecting Human Rights

## Our Vision and Commitment

Skyscanner is committed to respecting and upholding human rights in all aspects of our operations and supply chain. We believe in creating an inclusive, fair, and dignified environment for all individuals, ensuring that human rights are upheld and respected at every stage of our business activities.

We have a zero-tolerance approach to human trafficking and modern slavery and want human rights abuses to have no part in any of our supply chains. We will not work or continue to work with any organisation that we find has been knowingly involved in either human trafficking or modern slavery.

## Our Expectations

We expect you to share our commitment in upholding and respecting human rights, by implementing ethical business practices and policies that protect the dignity and well-being of all individuals within your operations. Slavery and human trafficking should have no part in any organisation we work with.

Our expected standards in relation to human rights and modern slavery are set out in our [Modern Slavery Policy](#).

We expect that you not only adhere to that policy, but that you pledge to assist in the eradication of slavery and human trafficking by requiring the same standards in your own supply chains.





# Keeping a Safe and Healthy Environment

## Our Vision and Commitment

At Skyscanner, we believe that every worker has the right to a safe and healthy workplace. Our commitment to worker health and safety is integral to our operations and we are dedicated to fostering a culture where safety is a core value, ensuring that risks are proactively identified and mitigated to prevent workplace injuries, illnesses, and incidents.

## Our Expectations

We expect you to share our commitment to worker health and safety by implementing robust policies and procedures that protect all individuals within your operations.

### We expect you to:

1. Comply with all relevant health and safety laws, regulations,
2. and industry standards in the regions where you operate.
3. Provide and maintain a safe and clean working environment, free from recognised hazards.
4. Offer regular health and safety training to all workers to reinforce awareness and understanding of workplace risks
5. and safe practices.
6. Foster a safety-first culture by encouraging workers to report unsafe conditions and providing mechanisms for reporting.



# Making a Positive *Impact*

With Skyscanner's scale and reach comes a responsibility to ensure our business has a positive impact on our people and communities, as well as an acknowledgement that we must take action when it comes to climate change and the impact our business has on the environment. We expect our suppliers to assist us in our efforts and take on their share of the responsibility.

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# Building Accessibly

## Our Vision and Commitment

Our vision is to make Skyscanner a flagship of disability inclusion, our products accessible to all, and travel planning easier for people with disabilities.

We believe the world belongs to everyone. We seek to make our site and app places where anyone, no matter their disability, can plan travel. Improving disability inclusion is extremely important to us and, in dedication to making it happen, Skyscanner joined [The Valuable 500](#).

Internally, our inclusive culture helps our employees with disabilities thrive. For our disabled travellers, we're working hard on making our website and mobile app more accessible, so everyone can plan and book trips with ease.

## Our Expectations

We encourage you to demonstrate your own commitment to accessibility by supporting our disability inclusion aims for your own employees, workers and users of your products and services.

By considering disabled users during each stage of product and/or service development, meeting accessibility standards, testing with disabled people and thinking in a fully inclusive way, you can support more people living with a disability, while increasing your brand loyalty, reputation and bottom line.

Our [Accessibility Hub](#) is packed with guidelines, tips and advice to help you make your digital products easier to use by disabled users.





# Fostering Diversity, Equity & Inclusion

## Our Vision and Commitment

Travel means discovering new perspectives and experiencing diverse cultures. We believe that travel is for everyone. We know that Skyscanner will be strongest when our team is both inclusive and diverse and we are committed to taking that journey together. We recognise and challenge everyday biases, remove obstacles to inclusion and ensure that all our people can thrive.

Within our network of suppliers, we want to foster an environment which is inclusive of everyone and respects individuals.

## Our Expectations

Skyscanner is an equal opportunities employer and seeks to work with like-minded suppliers who share our values of diversity, equity, and inclusion. We take pride in partnering with a diverse range of qualified suppliers who are dedicated to excellence and fairness in all aspects of their operations.

Discrimination in any employment practice - whether related to hiring, compensation, training, promotion, termination, or retirement - based on any protected characteristic under applicable laws should not be tolerated.

### Our expectations of you are that you:

1. Create and maintain an environment where all employees and workers feel valued, respected, and empowered to contribute fully.
2. Actively promote diversity in recruitment, retention, and leadership opportunities.
3. Provide reasonable accommodations to support the diverse needs of employees and workers, in compliance with legal requirements.
4. Implement regular training programs for personnel involved in hiring, promotion, and other employment decisions to ensure awareness of equal opportunity and non-discrimination policies.





# Protecting Our Planet

## Our Vision and Commitment

To meet Skyscanner's vision, we must ensure that we prioritise protecting the health of the planet so that future generations of travellers can enjoy all it has to offer. We are experiencing a climate crisis, and we all must play a part in keeping our planet within safe warming limits.

We signed the Glasgow Declaration in 2021, following which we pledged to reach net zero by 2045 at the latest. To reach that goal, we committed to both measure and drastically reduce our carbon emissions, which includes the upstream and downstream emissions from our partners and suppliers (i.e., Scope 3 emissions under the Greenhouse Gas Protocol). As such, working with our partners and suppliers to also reduce their own emissions is key to achieving our net zero ambitions.

## Our Expectations

We expect you to always comply with environmental laws and regulations in any jurisdiction in which you operate.

Further, we expect you to be considering your own impact on the planet and how you can work to minimise that impact and instil environmentally friendly practices in all you do. Whilst each supplier's own situation may require different environmental considerations, we ask that you join us in:

1. Committing to reaching net zero as soon as possible, but no later than 2050.
2. Measuring and reporting publicly on your corporate carbon footprint. Any emissions data available should also be shared with Skyscanner to support our reporting and tracking of improvement initiatives, where appropriate.
3. Setting rigorous and ambitious science-aligned targets, so you can follow how the science says your business will reach net zero.
4. Supporting the communities you operate within, working together to make a difference whether by donating time, expertise or investment.





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