



Modern Slavery Statement

This statement sets out Skyscanner Holdings Limited's ongoing commitment as a responsible business to ensure that modern slavery and human trafficking is eradicated, in accordance with the Modern Slavery Act 2015.

About us

Skyscanner is a global provider of an online travel platform which has over 110 million monthly users across the world searching for flights, hotels and car-hire. We are primarily a "meta-search site", providing an overarching and comprehensive search function covering as many providers and travel intermediaries as possible, as well as offering direct booking options for certain providers.

Our vision is to help every traveller explore the world effortlessly, for generations to come.

Skyscanner employs over 1,400 people of over 70 nationalities and has its offices in Edinburgh, London, Glasgow, Barcelona, Miami, Singapore, Tokyo and Shenzhen. Our business is organised into different corporate entities registered in various countries, including the United Kingdom (the "**Skyscanner Group**"). Skyscanner Limited is headquartered in the UK and operates Skyscanner's commercial activity, including its software engineering, marketing, legal, commercial, business operations, people and finance functions. Skyscanner's ultimate parent company is Trip.com Group Limited, which is a company listed on the NASDAQ and Hong Kong stock exchanges.

Our supply chains

The Skyscanner Group does not operate flights, hotels or car-hire itself. However, we are conscious of the travel industry context in which we operate and our responsibilities within our supply chains regarding the prevention of slavery and human trafficking.

We work with over 1,200 airlines, online travel agencies, hotel groups, travel brokers and other third parties, whom we refer to as our "partners". These partners are located in countries across the globe, but mainly in the Americas, EMEA and APAC regions. The main service we provide to our partners is through our online meta-search platform, which facilitates the sale of travel products (being flights, hotel stays and car-hire) by our partners. We also provide other technology services to our partners, including powering some partners' search functions on a partner's own website and providing certain travel data to partners and other third parties.

In terms of the Skyscanner Group's own suppliers, these are mainly other technology services companies who support our systems, platforms and business functionality. However, we also engage suppliers from time to time for recruitment, additional software engineering support, and marketing services. We work with approximately 1,000 suppliers and are conscious that services sourced from outside of the United Kingdom or the European Economic Area are potentially more at risk of slavery or human trafficking issues. If services have to be sourced from such locations, we look favourably on suppliers who can demonstrate a commitment to human rights and fair working conditions.

Our policies on slavery and human trafficking

The Skyscanner Group is committed to conducting business in an ethical manner. We have an internal-facing Anti-Slavery and Human Trafficking Policy in place, last updated in December 2023, with which we expect everyone working for us to always comply. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.



On our external-facing website we have a Modern Slavery Policy, which explicitly sets out our expectations for ensuring slavery and human trafficking has no part in any organisation with which we work. For example, it states that workers must have freedom of movement and be free to file grievances without fear of retaliation. All partners must adhere to our Partner Terms and our Partner Policy, which set out our contractual relationship and the standards in place to protect the users of our marketplace. The Partner Policy stipulates that our partners must adhere to our Modern Slavery Policy, failing which the contractual relationship may be subject to immediate termination.

We also have in place a whistleblowing procedure for the submission of complaints or concerns. It is designed to encourage and to protect anyone who wishes to raise concerns about wrongdoing within or outside of our business. We updated our whistleblowing procedures in January 2024 to streamline reporting through an online service and ensure complaints could be made with the utmost confidentiality preserved.

Due diligence processes for slavery and human trafficking

The Skyscanner Group's recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have procedures in place for the vetting of new employees and to ensure that we can confirm their identities and that they are paid directly into an appropriate personal bank account. No worker pays for a job with Skyscanner, with Skyscanner bearing all recruitment fees.

To ensure that our employees are not subject to undue influence and are treated fairly and in accordance with our company value of '*we care, always*', we have human resource policies and procedures in place globally, including a Grievance Policy. Employees are invited to comment on our policies and procedures, as we are always striving to hear different views and to improve.

If we were to discover that any of our employees had been complicit in human trafficking or modern slavery, we would take the appropriate disciplinary action against them, which could result in their dismissal for misconduct or gross misconduct. Contractors who had been complicit would have their contract terminated immediately without notice.

Our Ironclad contract management tool, which is used across our organisation, ensures that all partner and supplier contracts are reviewed, and appropriate due diligence can be carried out, by (as applicable) our Procurement, Finance and Legal teams before contracts are signed. We want to ensure that our partners and suppliers respect and enforce our expected standards and pledge to assist in the eradication of slavery and human trafficking.

We continue our work to improve our supplier assessment process. Having implemented the Workday Strategic Sourcing system in February 2023, enabling us to capture and store key supplier information, including responses received from suppliers to our modern slavery questionnaire, we then moved on to implementing the Craft Supplier Intelligence tool in February 2024. Craft is a third-party risk management tool to enable proactive monitoring of 100 per cent of our supply chain for key risks and provides enhanced due diligence on suppliers prior to and after onboarding. Additionally, our Procurement team is now also using Brand Watch. Brand Watch allows the team to search against our supply chain where a concern is flagged in Craft, so they can check mainstream media and social media for further information about key terms and pinpoint issues. With these tools, we will look to greatly improve our understanding of Skyscanner's supply chain and where our areas of risk lie, including regarding aspects of modern slavery.

We take a zero-tolerance approach to human trafficking and modern slavery. The Skyscanner Group will not work or continue to work with any organisation that we find has been knowingly involved in either human trafficking or modern slavery.

Training



As part of our efforts to ensure compliance with our core company values and prevent abusive, exploitive, or illegal conditions in the workplace, our Legal team has previously conducted internal employee and management training regarding human rights concerns, including human trafficking and slavery associated with our supply chains to those involved in associated areas within the business. We ensure that future training is repeated for relevant individuals at an appropriate cadence, so teams have the knowledge to identify and prevent modern slavery.

The Procurement team is enrolled in the diploma qualification with the Chartered Institute of Procurement and Supply. As part of this learning path, they have focused studies on ethical procurement in general and modern slavery in the supply chain specifically.

Our effectiveness in combating slavery and human trafficking

We will continue to monitor our efforts in relation to eradicating slavery and human trafficking. No instances of modern slavery in our supply chains were reported to us in 2023. We would act immediately to address any concerns identified.

In a continued effort to improve, we have set the following Key Performance Indicator targets to achieve in the next 12 months:

- Continue our efforts to implement a Supplier Charter covering all those supplying services to us, to ensure our requirements beyond our contractual terms are clearly conveyed to our suppliers and to incorporate our Modern Slavery Policy into the supplier relationship.
- Continue to ensure that 100 per cent of the Commercial and Procurement teams are trained on modern slavery, so they can help raise awareness of modern slavery within our supply chains and advocate for change where needed with our partners and suppliers.

At Skyscanner, our Board of Directors takes the responsibility for implementing this statement and its objectives. Our Chief Legal Officer has day-to-day responsibility and ensures we provide adequate resources and investment across the Skyscanner Group to confirm that slavery and human trafficking is not taking place within the organisation or within our supply chains.

Assisting the Chief Legal Officer in our efforts to combat slavery and human trafficking, we have a team dedicated to compliance, which consists of colleagues from the Legal, Procurement, Commercial, Internal Audit, Finance and People teams.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Skyscanner Group's slavery and human trafficking statement for the financial year ending on **31 December 2023**. It was approved by the Board on 28 June 2024.

Signed by:

A handwritten signature in black ink that reads "John Mangelaars".

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John Mangelaars

Chief Executive Officer