



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 approximately 100 million active users per month across the world who search flights, hotels and other travel-based services and amenities. We are primarily a "meta-search site", i.e., we provide an overarching and comprehensive search function covering as many providers and travel intermediaries as possible. We also have direct booking options for certain providers, as well as having a booking platform where travellers can book directly with Skyscanner.

Our mission is to lead the global transformation to modern and sustainable travel.

Skyscanner employs over 1,000 people of over 60 nationalities and has its principal offices in Edinburgh and London, with significant offices around the world, including in Barcelona, Miami, Singapore and Shenzhen. Our business is organised into numerous 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.

Our supply chains

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

We work with over 1,000 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, facilitating the sale of travel products (being flights, hotel stays and other travel-based services and amenities) by our partners on our online marketplace. 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 do engage suppliers from time to time for recruitment, additional software engineering support and marketing services. We currently have approximately 1,500 suppliers we work with. We are conscious that services sourced from outside of the United Kingdom or European Community 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 Anti-Slavery and Human Trafficking Policy in place, which we expect everyone working for us to abide by at all times. Our policy reflects our commitment to acting ethically and with integrity in all of



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.

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 our business.

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 ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

To ensure that our employees are not subject to undue influence and are treated fairly and in accordance with our core value to *treat everyone with empathy, care and respect - always*, we have human resource policies and procedures in place globally. 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.

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.

All partners must abide by our Partner Terms and our Partner Policy, which set out our contractual relationship and the standards that we expect partners to abide by in order to protect the users of our marketplace. These documents, which govern relationships with our partners, stipulate that partners must abide by our Modern Slavery Policy, a copy of which is on our website and incorporated in our Partner Policy, or the contractual relationship is subject to termination. Our Partner Terms ask that our partners comply with applicable labour and employment laws and with the Modern Slavery Act, to protect against slavery and human trafficking.

We are continually working to improve our supplier assessment process.

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 conducts on-going 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. The training specifically covers mitigating risks of human trafficking and slavery within the Skyscanner Group's supply chains and is mandatory for those company employees and management who have direct responsibility for supply chain management, such as our Commercial and Procurement teams.

Our effectiveness in combating slavery and human trafficking

We will continue to monitor our efforts in relation to eradicating slavery and human trafficking.

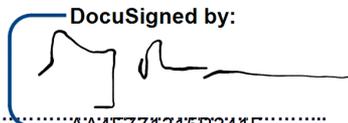


We intend to put in place a Supplier Charter covering those companies supplying services to us, to ensure our requirements are clearly conveyed. Additionally, we plan to update our Modern Slavery Policy on our website to make it a clear code of conduct that explicitly sets out our expectations for ensuring slavery and human trafficking has no part in any of the organisations we work with.

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 involvement 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 2020. It was approved by the Board on 30 April 2021.

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John Mangelaars
Chief Executive Officer