



# 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 160 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. Our vision is to become the world's number one travel ally.

Skyscanner employs around 1,400 people of over 70 nationalities and has its offices in Edinburgh, London, Glasgow, Barcelona, Shenzhen, Singapore, Miami, Tokyo and New Delhi. 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 colleagues

Our Skyscanner values and expected behaviours underpin our vision and are embedded in our company culture. We believe that how we conduct ourselves at work in achieving our vision is just as important as the work that we do.

The Skyscanner Group's thorough recruitment process, which is transparent and reviewed regularly, helps us reduce the risk of human rights infringements (including under the Modern Slavery Act 2015). The vast majority of our colleagues are hired through our own teams. For roles where we work with external agencies, we ensure they follow the same thorough processes that we do. 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 they are paid directly into an appropriate personal bank account. No worker pays for a job with Skyscanner, with Skyscanner bearing all recruitment fees. All colleagues must have a right to work in their country of employment.

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 supply chains

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 that 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 1,400 suppliers (direct contractors, technology providers) and are conscious that services sourced from outside the United Kingdom or the European Economic Area are potentially more at risk of slavery or human trafficking issues. If services need 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. Our company policies focus on fostering a culture of equality, fairness, respect and inclusivity. We welcome and encourage our colleagues to speak up about behaviour that goes against our values, in the knowledge that action will be taken when concerns are raised.

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.

This year, we are introducing a Supplier Code of Conduct, to set out the ethical, social and environmental standards we expect from all third-party suppliers and contractors. The Supplier Code of Conduct incorporates our Modern Slavery Policy's requirements, and we will be rolling it out to our suppliers so they can help us build a resilient supply chain based on ethics and integrity.

We also are introducing an Employee Code of Conduct, which will include guidance for colleagues on respecting human rights and our anti-modern slavery expectations, as well as where to go if our people have concerns.

### **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 training is repeated for relevant individuals at appropriate intervals, so that teams have the knowledge to identify and prevent modern slavery.

The Procurement team is at varying stages of completion of the diploma qualification and advanced 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.

### **Speaking up**

We take openness seriously and we want our colleagues to feel safe when they raise their concerns. Our Speak Up channels give employees and contractors a way to report any misconduct in a way they feel comfortable –



they can choose which of the channels to use, whether that be to escalate a matter to a manager, the People team, a member of the Legal team, under our Grievance Policy or through our whistleblowing procedures.

All reports made are treated with the utmost respect for confidentiality. We will not tolerate retaliation against anyone who raises a concern in good faith, participates in an internal investigation, or refuses to engage in conduct that violates applicable laws or Skyscanner policies.

### Risk assessment and management

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 – including the various jurisdictions - and our responsibilities within our supply chains regarding the prevention of slavery and human trafficking.

We consider that there is low risk of modern slavery occurring within the Skyscanner Group itself. Our supply chain continues to be at the highest level of potential risk because it includes non-regulated businesses and given the types of service categories of our suppliers within it. We will therefore manage any potential risks dependent on the nature of the supplier arrangement as part of any ongoing assessments.

We have determined the higher-risk service categories within our supply chain to be:

- **IT and Software Development Services:** These suppliers represent approximately 40% of our total supplier spend, and we see higher risk particularly for those involving offshore development centres in regions with higher modern slavery risk indices. While digital services may appear to have lower modern slavery risks compared to other industries, there are hidden risks in the technology supply chain, including software development outsourcing to regions with weaker labour protections and the use of contract workers who may be subject to exploitative practices.
- **Facilities Management and Cleaning Services:** Representing less than 1% of our total supplier spend, these are a higher-risk service category due to our office locations being in regions where these services may often employ migrant workers.
- **Marketing and Promotional Materials Services:** Representing approximately 40% of our total supplier spend, these suppliers are higher risk particularly where their manufacturing occurs in high-risk regions.
- **Hotels, Airlines and Other Travel Services:** As a platform connecting travellers with over 1,200 travel service providers, we must consider the potential for our services to be indirectly linked to modern slavery through our partners' operations. This includes travel partners that may operate in high-risk regions or sectors where labour exploitation is more prevalent.

These categories require enhanced scrutiny and targeted due diligence, as appropriate to the nature of the services and contract. We regularly review and update our risk assessments as new information becomes available through our monitoring tools, including Craft Supplier Intelligence.

### Due diligence processes for slavery and human trafficking

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 our Procurement, Finance and Legal teams (as applicable) 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 and the Craft Supplier Intelligence tool, we now actively monitor our top 100 most critical and strategic suppliers in our supply chain for key risks and conduct enhanced due diligence on suppliers both before



and after onboarding. Additionally, our Procurement team uses Craft Supplier to monitor mainstream and social media for potential issues related to our critical supply chain partners. We assess leverage points with suppliers based on spend, relationship strength, and strategic importance to apply appropriate pressure for improvements where needed. In 2025, we introduced a new tool, Supplier.io, which allows us to review accreditations assigned to other suppliers in our supply chain. With these tools and approaches, we have significantly improved our understanding of Skyscanner's supply chain risks, including those related to 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.

### **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 2024. We would act immediately to address any concerns identified.

In 2024, we monitored 73 suppliers on a continuous basis through our Supplier Intelligence and Risk Management program, proactively assessing a further 61 suppliers who were either onboarded or proposed to be onboarded during the course of 2024.

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

- Implement and obtain commitment to our Supplier Code of Conduct from 70% of our top 100 most critical suppliers by the end of 2025.
- Achieve completion of role-specific modern slavery training for all Commercial and Procurement team members, enabling them to effectively identify risks and drive improvements throughout our supply chain.

### **Responsibilities and approvals**

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 2024**. It was approved by the Board on 24 October 2025 .

Signed by:

*Bryan Batista*

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**Bryan Batista**

Chief Executive Officer