INGHAMS
SANTA'S LAPLAND

HUMAN RIGHTS POLICY
2026

Review cycle:
Annual (or sooner where risk changes materially)

Approved by:
General Management Team / MD

Scope:
This policy applies to our employees (permanent, fixed-term, seasonal, freelancer, intern, volunteer or agency worker); our suppliers and business partners; and all destinations where Inghams and Santa's Lapland operate.

Our commitment

Inghams and Santa's Lapland are committed to respecting, protecting and promoting human rights across our business, destinations and supply chain.

Our holidays depend on people: our colleagues, customers, hotel workers, guides, drivers, local communities and business partners.

We commit to avoiding causing or contributing to adverse human rights impacts and to identifying, mitigating and addressing such impacts should they occur.

This policy is informed by:

- **The United Nations Guiding Principles on Business and Human Rights**
- **The International Bill of Human Rights**
- **The International Labour Organization Declaration on Fundamental Principles and Rights at Work**
- **The German Supply Chain Due Diligence Act**
- **ABTA guidance on human rights in tourism**

Our human rights principles

We expect all persons and organisations working with or on behalf of the business to respect these principles:

- We treat people with dignity, fairness and respect.
- We do not tolerate forced labour, child labour, exploitation, harassment, abuse or discrimination.
- We expect concerns to be raised safely and handled seriously, confidentially and without retaliation.
- We take a risk-based approach, focusing first on the most serious risks to people.

Key human rights expectations in practice

Labour and working conditions

We expect our own business, suppliers and partners to provide:

- Fair recruitment and employment terms: including clear contracts, lawful wages and lawful working hours.
- Safe and decent working conditions: including rest breaks, safe workplaces and suitable staff accommodation where provided.
- Safe routes to raise concerns: including clear, accessible grievance routes and protection from retaliation.

Forced labour, modern slavery and child labour

We do not tolerate:

- Forced labour, slavery or servitude: including coercion or preventing workers from leaving employment.
- Worker-paid recruitment costs or document retention: including unlawful recruitment fees, deposits or passport retention.
- Child labour or unsafe work for young workers: including employing children below the legal minimum age or allowing young workers to carry out hazardous work.

Equality, non-discrimination and dignity at work

We expect our own business, suppliers and partners to:

- Treat employees, customers, supplier workers and local communities fairly and with dignity.
- Not tolerate discrimination for any reason, harassment, exclusion, abuse or degrading treatment.
- Work to make opportunities, services and support accessible and fair.

Children, customers and vulnerable people

Tourism can create specific safeguarding risks. We do not permit tourist visits to orphanages, schools or child-care institutions, or volunteer work with children as tourism products. Employees and partners must report suspected child exploitation or safeguarding concerns through appropriate channels.

Destination communities and Indigenous rights

We respect local communities, culture, livelihoods, land, water and resource rights, including the rights of Indigenous communities. We seek to avoid tourism activities that contribute to displacement, pressure on local services, disrespect for culture, environmental harm or unfair distribution of benefits.

Health, safety and wellbeing

Our own operations and suppliers must provide safe working and service environments. This includes safe workplaces, accommodation, transport, excursions and equipment, as well as appropriate training, rest, sanitation, drinking water and protection from serious risks.

Environmental harms that affect people

We recognise that environmental harm can affect people's rights to health, water, food, sanitation and livelihoods. We expect suppliers to manage risks linked to water use, pollution, waste, emissions, biodiversity loss and land-use impacts.

Supply chain and partners

We expect suppliers and partners to meet our Supplier Code of Conduct and all applicable laws. Where local law and this policy differ, the stricter standard applies.

Hotels are a priority human rights risk area because they employ large numbers of workers directly and indirectly, including cleaners, kitchen staff, porters, maintenance workers, security and agency staff. Transport services (airports, flights, trains, transfers and coaches) can also present human rights risks because customers and workers move across jurisdictions, vulnerable people may be in transit and labour conditions may vary between contractors and subcontractors.

All suppliers must respect human rights, prevent harm, cascade expectations where relevant, provide information when requested, cooperate with reasonable checks or corrective actions, report serious concerns promptly and protect complainants from retaliation.

Reporting concerns and remedy

Employees, suppliers, workers in our supply chain, customers, destination communities and other affected people should be able to raise concerns safely. Concerns may include labour exploitation, modern slavery, child safeguarding, discrimination, harassment, unsafe conditions, poor accommodation, community harm, environmental harm affecting people or retaliation.

- Reports can be raised through existing company channels and through the REWE Group grievance mechanism at humanrights@rewe-group.com or rewe-group.reporting-channel.com.

We will treat concerns seriously, protect confidentiality where possible, prohibit retaliation, escalate safeguarding or criminal concerns where appropriate, and seek remedy where harm has occurred. Where suppliers are involved, this may include corrective action plans, training, worker repayment, safety improvements, suspension of sales or termination in serious cases.

Roles and responsibilities

- Senior leadership approves this policy, reviews significant risks and ensures suitable resources.
- Sustainability maintains the policy, supports risk screening and coordinates reporting.
- Destinations and contracting teams embed requirements into supplier onboarding and follow up corrective actions.
- Operations and HR support staff welfare, fair treatment, grievance routes and incident escalation.
- Suppliers meet this policy and Supplier Code requirements, report concerns and cooperate with remediation.
- Risk & Safety monitor and audit suppliers for health and safety risks.

Training, monitoring and review

We will provide proportionate training and guidance for relevant teams, including seasonal staff, operations teams, managers, customer-facing teams and supplier-facing colleagues. Training may cover human rights in tourism, seasonal staff welfare, modern slavery indicators, child safeguarding, grievance routes, discrimination and supplier escalation.

We will monitor implementation through practical indicators such as training completion, grievances raised, corrective actions, supplier audit, serious incidents and escalations to senior leadership.

This policy will be reviewed annually, or sooner if there are significant changes to our business, destinations, supply chain, legal requirements or identified human rights risks.

Last updated: August 2026