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	position	name	date
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Approved by			

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1. INTRODUCTION

Compliance with sustainable development principles is a priority for the companies within the eTravel capital group (hereinafter referred to as eTravel). Therefore, we prioritize fostering relationships and principles of cooperation with clients and suppliers that integrate social responsibility, environmental protection, human rights, and ethical business standards.

Compliance with this Code is an important factor in deciding whether eTravel will establish or continue cooperation with a given partner.

The following commitments are based on the founding principles of the UN initiative on human rights, working conditions, the environment and the fight against corruption, and the UN Guiding Principles on Business and Human Rights, which set out the principles for companies to respect these rights.

The ability of eTravel partners to transfer the commitments contained in the Code into appropriate practices is part of the criteria for their evaluation throughout the period of cooperation.

This Code is not intended to create a conflict or alter the terms of any existing contract. Unless such an agreement provides otherwise, in the event of a conflict, the partners are obliged to comply with the terms of the applicable agreement.

eTravel reserves the right to change the content of the Code.

2. ETHICS IN BUSINESS

The Partner undertakes to comply with the laws and regulations applicable in the countries in which the business is conducted or services are provided.

The Partner undertakes to comply with anti-corruption provisions, directives and regulations, including:

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- Combating all forms of corruption, including extortion and bribery;
- Refraining from all forms of anti-competitive practices, including illegal agreements or abuse of a dominant position that could impede effective competition;
- Compliance with the rules regarding the confidentiality of non-public information provided by signatories and intellectual property rights.
- Not engage in illegal payment practices or accept any illegal payments from any customer, supplier, its agents, representatives or others.

Consistent with our business priorities, we do not accept any form of bribes and reject any form of gifts or hospitality that would constitute or appear to be unlawful. The partner must guarantee full cooperation in counteracting embezzlement and corruption and inform its employees and subcontractors about the obligation to comply with national and international regulations in this area.

3. CERTIFICATES, PERMITS

In its value chain, eTravel prioritizes partners with certifications in quality or environmental management, such as ISO 9001 or ISO 14001.. At eTravel's request, the Partner should be able to present its certification or, alternatively, appropriate information regarding the impact of its activities on the environment, care for the health and safety of employees, and compliance with human rights.

The Partner must have appropriate permits specific to its activity or obtain these permits within 3 months of establishing cooperation with eTravel. Where local industry standards and international guidelines are more stringent than the law, then the partner must comply with the more stringent requirements.

4. CONFLICT OF INTERESTS

The Partner will avoid any conflicts of interest or situations giving the appearance of a potential conflict of interest. All interested parties are expected to be notified in the event of an actual or potential conflict of interest. This includes conflicts between the interests of eTravel and your personal interests or the interests of close relatives, friends or colleagues.

5. HUAMAN RIGHTS, EMPLOYEE RIGHTS

The Partner undertakes to implement the UN principles on business and human rights. These principles explain how to apply, regardless of the country in which they operate, the principles of the Universal Declaration of Human Rights (adopted by the United Nations in 1948) and the Conventions of the International Labor Organization, including in particular:

- Prohibition of forced or compulsory labor and ill-treatment of its employees. This includes prohibiting all practices of modern slavery and human trafficking;
- Prohibition of child labor;
- Prohibition of discrimination: there can be no distinction, exclusion or preference based on skin colour, gender, age, language, religion, sexual orientation or identity, national or social origin, opinion on disability;
- Adhering to occupational health and safety standards by ensuring a safe and suitable working environment for employees;
- Ensuring fair remuneration and working hours by adhering to minimum wage requirements that meet basic needs, in compliance with local regulations, and guaranteeing rest breaks;

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- Guaranteeing respect for freedom of speech, the right to organize and the right to collective bargaining.

The Partner must comply with all employment rights guidelines. eTravel pays attention to protecting the health and safety of all its employees, both permanent and temporary employees. By putting health and safety as a priority, we expect that these values will also be respected by our value chain.

The partner must be able to document that it complies with these regulations.

6. SUBCONTRACTORS/SUB-SUPPLIERS

The Partner must ensure that its suppliers and subcontractors promote and comply with the principles of this Code.

The Partner undertakes to implement a monitoring system enabling it to prevent and deal with all risks and their environmental and social impacts throughout the supply chain.

7. ENVIRONMENT

eTravel prefers those in its value chain who take targeted actions in the area of environmental protection.

REGULATIONS

The Preferred Partner complies with environmental laws and regulations in the countries in which it operates.

CO2 EMISSIONS

Takes action to reduce fuel consumption to keep CO2 emissions as low as possible and is able to document its own emissions levels.

WASTE

Within the scope of applicable legislation, it has procedures for segregation, collection, storage, transport, recycling and waste disposal.

PREVENTING POLLUTION

It presents clear attitudes towards reducing environmental pollution, uses environmentally friendly technologies by limiting the impact of products and services on the environment throughout their life cycle.

8. INFORMATION SECURITY

The Partner undertakes to implement the necessary measures to ensure information security, in particular when the cooperation involves the processing of confidential and protected information.

Partners in the value chain must comply with laws governing intellectual property rights, including protection against disclosure, patents, copyrights and trademarks.

Partners must protect others' confidential and protected information, including personal information, from unauthorized access, destruction, use, modification and disclosure through appropriate physical and electronic security procedures. Partners must comply with current personal data protection regulations.

Preferred partners have implemented ISO 27001 or equivalent information security standards. Alternatively, they must document the application of security measures, including policies, physical security, and IT infrastructure safeguards, aligned with these standards.

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9. MONITORING

The conduct of eTravel partners in compliance with the Code is subject to periodic review. If any doubts arise as to the correctness of the partner's conduct, eTravel may conduct an audit in this area, either on its own or by commissioning a third party to do so. In the event that the partner is not prepared to apply the principles contained in the Code, eTravel will discuss with the partner what actions or measures should be taken to guarantee such compliance in the near future.

10. UPDATES AND REVIEWS

no	date	version	scope	updated by
1	2022-09-09	1	Periodic inspection – no changes	Mirosław Bohun
2	2024-08-22	2	Adding a section on information security	Mirosław Bohun
3	2024-09-18	2	Redrafting some of the provisions	Mirosław Bohun