

February 2025

Animal Protection Codes of Conduct

Foreword

At EXO Travel we recognise the importance of sustainable business practices to minimise our impacts on the environment and our destinations and to ensure our future resilience and growth. The protection of animals and nature is fundamental to our commitment to protect our destinations and our mission to offer more sustainable choices. It is an important matter for our colleagues and clients, but it is also essential to the survival of animal and plant species, ecosystems and all life on Earth.

Many tourism activities and nature-based experiences involve animals, from the viewing of wildlife to interactions in a captive setting. Excursions involving animals are popular products for EXO Travel, and in most cases, activities are informative and educational and can provide valuable revenue for conservation and income for local communities.

However, some activities can be problematic and need to be carefully managed to avoid negative impacts, which may otherwise lead to high-risk situations. Other activities can inherently pose an unacceptable level of risk and need to be avoided entirely.

Through the application of this Animal Protection Policy, EXO Travel will continue to offer nature-based tourism and animal activities with the peace of mind that those we do offer, operate under our strict guidelines that seek to protect the welfare of animals, people and the planet. We have ensured our policy is sufficiently robust by adopting industry best practices, internationally recognized Animal Welfare Guidelines and the expert advice of notable industry experts in animal and nature protection.



Hamish Keith
Chief Executive Officer



Alexandra Michat
Chief Purpose Officer

Our Commitments

In accordance with our principled approach to animal and ecosystem welfare, we developed these codes of conduct as guidance with the input and support of environmental NGOs such as WCS, WWF, ACES, ABTA and Animondial. To ensure animals and nature involved in our tourism activities can thrive, the following principles are applied across our operations:

- 1. Safeguarding animal welfare** – ensuring respect for animals involved in our experiences and supply chain by adopting measures that protect both their physical and mental welfare and, where applicable, ensuring living conditions are species-appropriate.
- 2. Preventing the disturbance of wildlife** – adopting an observation-only approach to wildlife viewing, measures are taken to protect both the health and welfare of animals and people;
- 3. Halting biodiversity loss** – adopting measures that seek to mitigate the drivers of biodiversity loss. These involve the sustainable sourcing of natural resources, actions to tackle illegal wildlife trade and invasive species, and measures to hold our suppliers accountable.
- 4. Restore nature and regenerate destinations** – acknowledging that our business will, to some degree, impact nature, EXO Travel invests in community-led nature conservation in our destinations, empowering local people, encouraging environment stewardship, and protecting the natural heritage of generations to come.

EXO Travel is committed to sustainability, including animal protection, and monitors key performance indicators across all areas. We publicly report on progress annually and continuously evaluate our efforts with external experts. While we offer animal-related excursions due to their popularity and ability to foster appreciation for nature, all must meet strict welfare, wildlife protection, and guest safety standards. By applying this Policy and engaging suppliers, we uphold our duty of care to animals and ensure responsible practices on-site.



Guidelines

Conservation concerns focus on endangered species, EXO Travel believes that tourism activities should generate revenue to support endangered species and conservation initiatives. Animal attractions and wildlife excursions must comply with CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) and the UN Biodiversity Plan. CITES, a legally binding agreement among and it regulates the trade of endangered species through government-issued permits to prevent exploitation and extinction. It also mandates proper conditions for wildlife in transit.

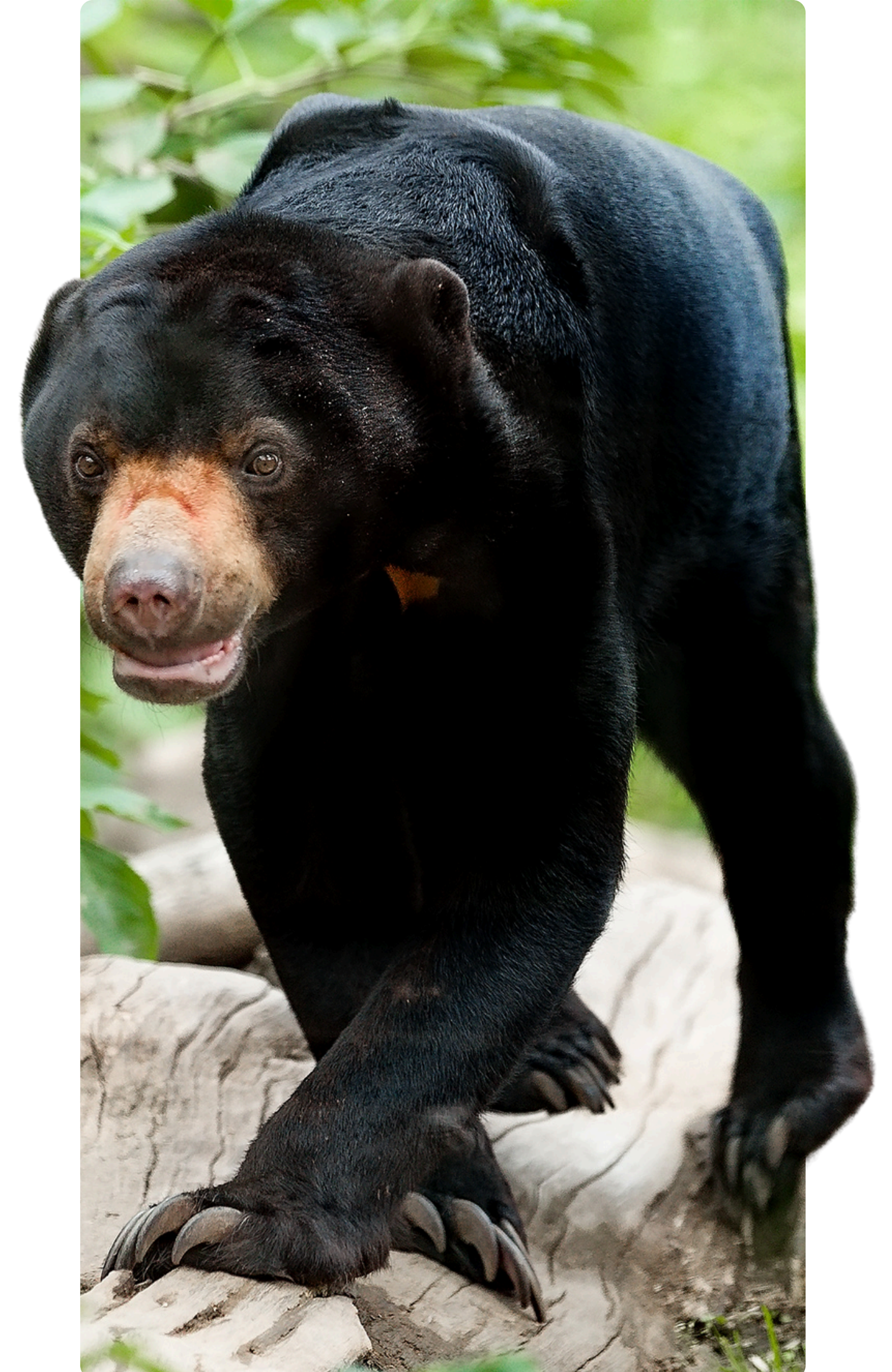
EXO Travel commits to inform its teams, guests, suppliers and partners that trade of any endangered animals whether live or dead (eg: tigers, primates, marine animals, pangolins, etc.) or their parts is illegal.

Additionally, national laws may govern the keeping of animals in zoos, sanctuaries, and riding stables, ensuring welfare and operational standards. Therefore, EXO will ensure that wildlife interaction laws in national parks or biodiversity-rich areas practices to prevent harm will be followed by suppliers and travelers.

EXO Travel is committed to assessing suppliers and working only with those that uphold The Global Standards for Animals in Tourism '**Five Domains**' to ensure ethical treatment :

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express normal behaviour
- Freedom from fear and distress

Sometimes we may promote or sell activities that generate concerns over animal welfare, or where activities are found to place animals, nature or people at risk. **At EXO Travel, we take all such concerns seriously and seek to address them by working with our partners and suppliers to prioritise improvements.** An attraction or excursion providers may be removed from sale if the required improvements are not fulfilled within a reasonable period of time.



Safeguarding Animal Welfare

While we believe animals belong in the wild, well-managed attractions should not be focused solely on entertainment, but offer valuable learning experiences and promote conservation efforts.

Ensuring the welfare of captive animals is a priority. In captivity, animals depend on humans for appropriate physical, social, and biological conditions. However, unfamiliar environments can disrupt natural behaviours such as hunting, foraging, and social interactions, often leading to stress or abnormal behaviour.

We encourage providers to gradually shift towards more natural experiences, such as larger enclosures and reduced human interaction. EXO Travel is committed to supporting suppliers in developing more animal-friendly practices.

We maintain open dialogue with suppliers to ensure they understand animal welfare needs and implement measures to provide safe, secure environments.



EXO Travel shall not offer any activity where travellers have direct access or opportunity to touch a wild animal unless all the following criteria are met:

- Those animals are in a captive environment
- The activity is proven not to negatively impact animal welfare or public health and safety
- The activity does not involve 'high-risk' species, including bears, sloths, primates (including chimpanzees, orangutans, gorillas, bonobos and gibbons), wild cats, wild pigs, cetaceans (whales, dolphins or porpoises), snakes, crocodiles, caimans, alligators or African elephants
- Guests are required to wash their hands with soap and hot water, or anti-bacterial soap, both prior to and after contact to minimise the risks of disease transmission
- The interaction is constantly supervised; supervision must be by a member of staff from the supplier / attraction / activity, who understands that species' needs and, ideally, the individual animal.
- Animal attraction providers have a legal license for the type of attraction or activity they offer.
- Animals are not 'humanised'
- Animals are not trained to perform unnatural trick
- Animals are not forced to join activities
- Animals are regularly checked by specialised veterinarians

Preventing the disturbance of wildlife

Tourists are often attracted to destinations because of wildlife found there, and wildlife encounters are often a memorable highlight of their travel experiences.

Although visits to National Parks (terrestrial & Marine) often support conservation efforts, they can also be damaging to wildlife living in these fragile ecosystems if not properly managed.

In many developing countries, wildlife-related activities form an important source of income. As such, these activities need to be framed as sustainable for both animals and locals.

Wildlife viewing practices, whether on foot, by boat or vehicle, from a balloon or on horseback, must be managed so not to cause the animals distress or injury, by:



- Communicating and ensuring respect by all visitors and excursion providers of local regulations and guidelines.
- Ensuring health & Safety and Emergency Procedures are being followed for employees/tourist by tour suppliers & excursion providers.
- Operating engines from boats or other vehicles away from coral reefs or high biodiversity areas,
- Ensuring that viewing vehicles and walking parties stick to the define roads, paths or viewing areas so as not to disturb wildlife, especially nesting birds or damage natural habitats.
- Ensuring that animals are not being chased, touched nor hunted and scared with loud noises or bright lights.

The good news is that, by taking part in responsible travel, holidays may be memorable whilst at the same time encouraging and supporting of wildlife conservation efforts, all while avoiding unnecessary damage to precious regional biodiversity.

Supplier compliance

EXO Travel is dedicated to fostering more sustainable and responsible tourism experiences across our destinations by avoiding practices that harm animals, nature and local people. Instead, we aim to offer educational experiences that promote respect for animals and the natural world. Nature-based tourism provides an opportunity for travellers to connect with and appreciate our region's rich biodiversity and experience the abundant wildlife and diverse animal experiences on offer, but we wish for these experiences to be conducted only with the utmost care – adopting a best practice approach that we advocate through our operations, supply chain, and Travel for Good programme.

Our Animal Protection Policy is central to these efforts. However, with over 90% of negative impacts typically found within a business' supply chain, achieving our goals relies on our partners and suppliers embracing similar values and safeguards. To support this, we must use our influence to encourage and support excursion providers to also prioritise the protection of animals and nature within their operations.

In alignment with our values 'We care deeply' and 'We deliver excellence', EXO Travel is not willing to work with excursion providers or activities that do not treat animals appropriately. It is essential that we adopt an aligned approach to supplier engagement to aid the effective application of our Policy and instil a duty of care within our supply chain.

Our approach needs to be supportive and educational but also include mandatory elements where appropriate to encourage our partners and suppliers to adopt aligned measures to safeguard animals in destinations. This is managed by including a **Sustainability Addendum** in all our supplier agreements to ensure that they are well-informed and made aware to our requirements.



Sensitive Interactions

Asian Elephants

Wild Asian elephants still roam isolated pockets of grasslands and tropical forests across 13 Asian countries but face severe threats from illegal hunting, habitat loss, and human-wildlife conflict.

As herbivores, they feed on leaves, stems, fruits, grasses, and tree bark, spending most of their time foraging. While females weigh around two tonnes, males can reach up to five tonnes.

Elephant encounters are thrilling, as these majestic creatures leave a lasting impression. However, as wild animals, they can be unpredictable and dangerous.

EXO Travel maintains open dialogue with suppliers to ensure visitor safety and responsible practices. We collaborate with NGOs to help owners, mahouts, and camp managers implement ethical alternatives that allow close encounters without compromising welfare.

EXO Travel believes elephants belong in the wild, but with thorough research and audits on their health and park management, ethical encounters can be offered.

Revenue from visits to national parks and elephant camps must support conservation efforts, benefiting Asian elephant survival and other wildlife. Camps should exist for rescue and conservation, not solely for tourism, providing sanctuary for elephants rescued from logging, abuse, or loss of their mothers.

Elephant-related tourism supports local communities, but riding is unnatural and harmful. While elephants can pull heavy loads, their fragile spines suffer from carrying excessive weight. EXO Travel only permits limited public interaction—feeding, touching, or washing—when it does not compromise an elephant's physical or mental welfare and has undergone a proper risk assessment, such as by ACES.



Primates

The opportunity to see wild primates on holiday in Asia is a highlight for many travellers to the region. With at least 97 formally-recognised species calling it home, the chances of seeing a primate are pretty good.

With the incredible number of similarities to us both genetically and behaviourally, it's easy to see why visitors are so enamoured with them.

Although viewing primates in National Parks can be good for conservational purposes, the interaction between tourists and primates can also be quite damaging and dangerous for both parties.

We have developed specific guidelines to assess suppliers/venues offering encounter with primates as well as touring advice for our guides.

The growing amount of tourists viewing primates in or outside national parks is not without risks; there are three main negative impacts we identified:

- **The risk of disease transmission**

primates are extremely vulnerable due to their genetic similarity with us, and can be seriously affected by human diseases -and vice-versa. For this reason primates and humans should not touch each other and keep a well-defined distance.

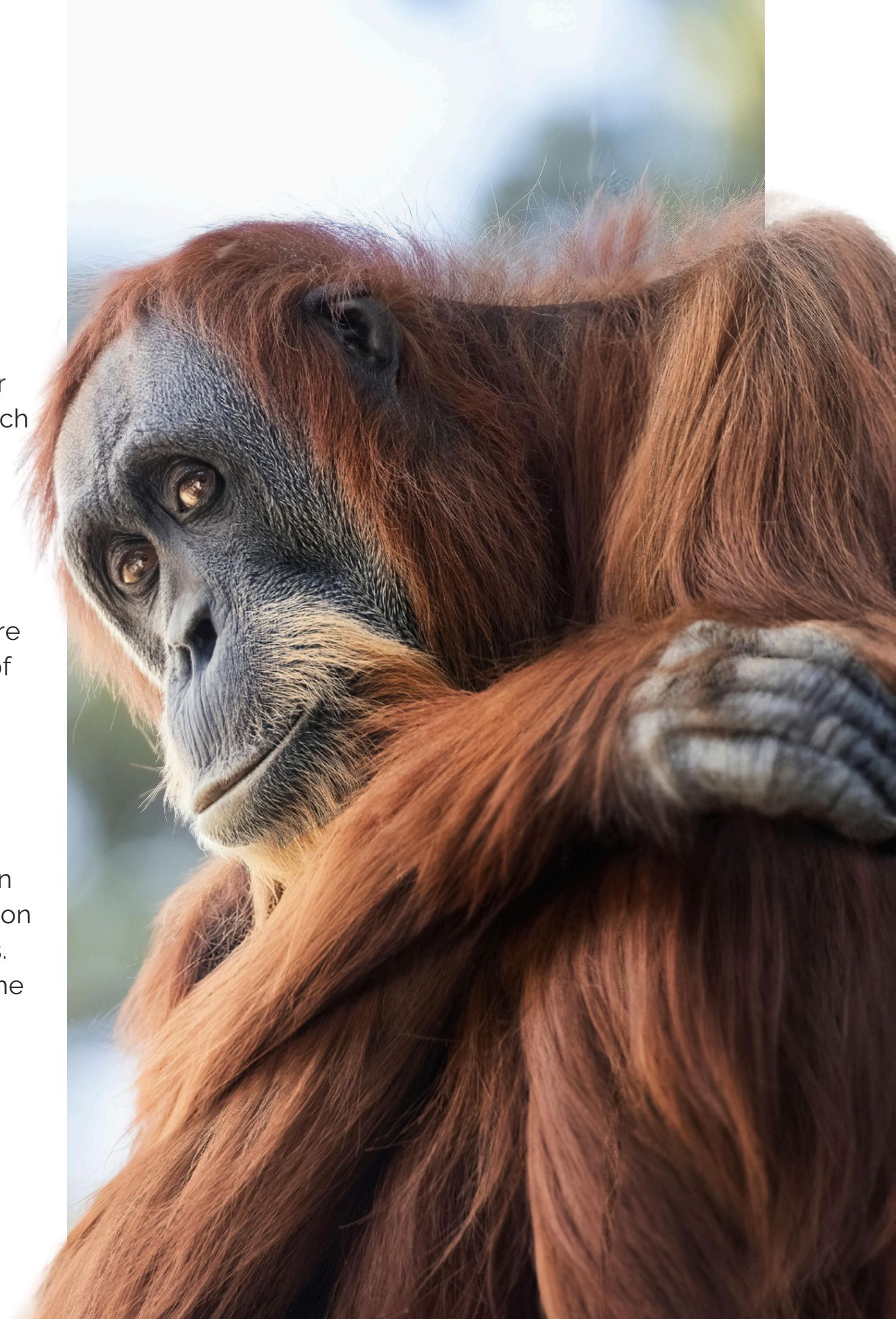
- **Feeding of primates by tourists**

This results in decreased foraging times and movement while increasing the overall food intake. By altering their natural diet, they are more susceptible to disease and illness. The feeding of primates can also increase the level of competition between primates and lead to aggressive behaviour.

- **Behavioural changes**

Primates that have increased levels of interaction with humans tend to show an increased opposition towards other primates as well as human beings. Personal safety is another good reason to limit the interaction between primates and humans.

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Marine Life

Particularly in Asia, snorkelling or diving is a wonderful opportunity to witness some of the world's most incredible marine biodiversity.

From whales and dolphins to sea turtles, an occasional shark or manta ray, and some of the world's most vibrant coral reefs, close up encounters with marine life is a highlight of many visits to the region.

But some rules to respect marine life should be followed. Despite the incredible size of the oceans, their ecosystems are remarkably delicate and have faced growing threats from human activity.

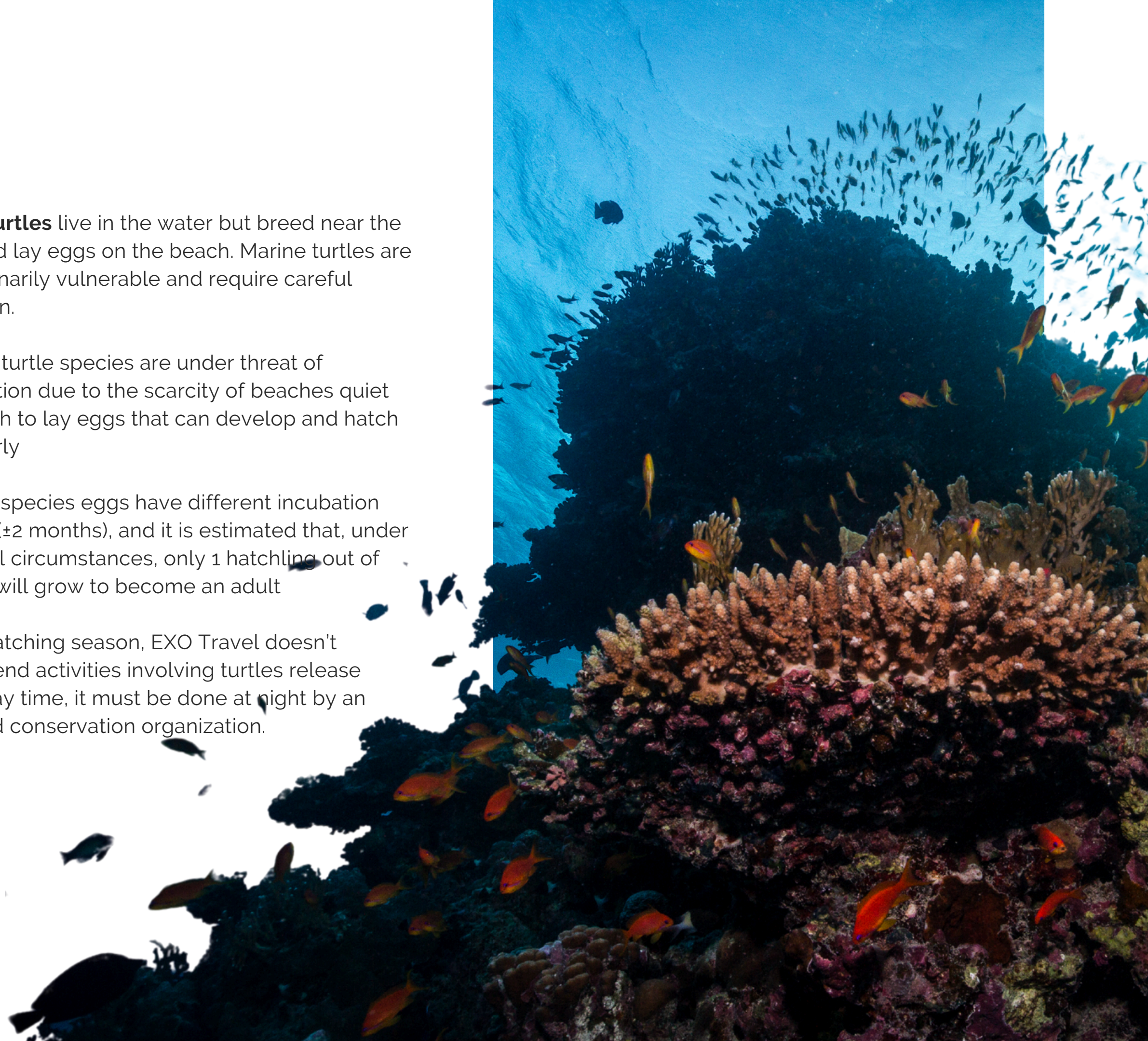
Coral reefs are more than just beautiful: they are keystone species critical to the health of marine ecosystems. Damage to them causes a cascade of impacts from the smallest organisms all the way to the biggest. Furthermore, taking great care when snorkelling, not just for their safety but for yours: contact with reefs can cause dangerous abrasions.

EXO Travel recommends certified or accredited diving centres, whenever they are available, especially by 'Green Fins'.

Marine turtles live in the water but breed near the shore and lay eggs on the beach. Marine turtles are extraordinarily vulnerable and require careful protection.

- Many turtle species are under threat of extinction due to the scarcity of beaches quiet enough to lay eggs that can develop and hatch properly
- Turtle species eggs have different incubation times (± 2 months), and it is estimated that, under natural circumstances, only 1 hatchling out of 1,000 will grow to become an adult

During hatching season, EXO Travel doesn't recommend activities involving turtles release during day time, it must be done at night by an approved conservation organization.



Our Guidelines for Product Development & Operations

At EXO Travel, our Product development teams play a key role in safeguarding wildlife and prioritising animal welfare. To ensure commitments translate into action, we have established dedicated guidelines providing general and specific advice on managing activities and suppliers.

We encourage teams to develop products that positively impact and financially support conservation centres. Using Product Selection Guidelines, they oversee excursions, ensuring operations and suppliers do not harm or exploit animals or nature. High-risk activities must be effectively managed, and suppliers must meet our standards, avoiding inappropriate conditions in our portfolios.

To uphold this approach, EXO Travel reviews new products and high-risk activities before promotion or sale. Compliance may require ground inspections.

Giving back more than we take

We strongly encourage our product development and operation teams to seek out in-destination partners and suppliers that offer opportunity for EXO Travel to make a positive contribution to animal and nature protection and to build back biodiversity in our destinations. Whether that be by supporting financially, in-kind, or incorporating animal sanctuaries that rescue and rehabilitate animals, or projects that restore nature into our offerings, EXO Travel and EXO Foundation seek to uplift people and better protect nature in our destinations.



Appropriate Conditions Requirements

Wildlife watching

We advocate for the protection of wildlife and their natural habitats, encouraging suppliers to adhere to IUCN guidelines for sustainable tourism and conservation practices and to communicate clearly applicable regulations to travelers / tour guides.

Animals in captivity

When creating a new experience/product involving animal- human interactions please ensure our suppliers follow these guidelines :

- Providing unrestricted access to clean drinking water and nutritious food in line with their species-specific needs (refer to the ABTA Animal Welfare Guidelines),
- Feeding routines should be species-specific, mentally stimulating and encourage natural behaviours,
- Environmentally complex enclosures that encourage a normal and diverse behavioural expression and choice, and ensure animals can move and exercise freely, with access to shelter and privacy from view,
- Preventative and curative healthcare provided by a vet,
- Enclosures and furnishings are clean, hygienic and well maintained,
- Social interaction for species that naturally live in groups or pairs, and protection from pain, fear and distress are guaranteed.

Focus : Animal Cafes

- The main purpose of animal cafes is entertainment or pet selling, thus it goes against our policy
- In the case of nocturnal animals like owls or hedgehogs, they have been bred to have a behaviour against their nature by keeping them awake during the day
- By touching them there is a risk of transmitting disease



Product Development requirements

We highlight here and in the following pages our product development guidelines :

- Make sure that guides, mahouts and national park rangers are trained to guarantee the safety of themselves and their clients
- Make sure that tourists are informed about rules to follow, and to avoid putting themselves in dangerous situations
- Make sure that local staff are paid appropriate living wages, housed in decent conditions and are not working excessively long hours
- Make sure that all waste is kept until thrown into appropriate bins
- Make sure to avoid offering motorised activities (i.e. quad-riding, 4WR tours, jet skis) in marine & riverside area
- Make sure to avoid promoting the use of motorised boats disturbing behaviour of birds, dolphins, whales and turtles

Instructions for our Guides

Our tour guides are always accompanied by specialists guides/rangers when leading groups in national park boundaries or conservation areas. They must help to convey guidelines that tourists should follow, enabling them to respect the natural wonders of our destinations. We also organise regular training for our tour guides, reminding them about our clearly defined guidelines and policies. Our main recommendations are as follows and they will be outlined through the next pages in the same way.

- **Do not** touch or feed animals
- **Do not** touch plants, trees or corals
- **Do not** scare wildlife
- **Do not** hunt wildlife or support hunting activities
- **Do not** litter, leave only footprints
- **Do not** wander off recommended trekking routes
- **Do not** offer for travellers to take part in wildlife-unfriendly activities (quad-biking, motocross, setting fires, etc.)

Primates

- Make sure primates are not viewed by tourists for a prolonged period of time. there is a time of coming and going
- Make it long enough to have a memorable experience but short enough not to disturb animals
- Make sure primates are viewed with groups of less than 10 persons
- Make sure that feeding of primates by tourist is not allowed
- Primates and humans should not touch each other and preferably keep a well-defined distance

- **Do not** approach or touch primates, especially babies
- **Do not** support activities that may humanise primates
- **Do keep** your distance at all times. A cough or a sneeze is enough to transmit diseases
- **Do not** feed or leave behind food. anything you hold in your hands or grab from your bag can be interpreted as food
- **Do not** chase away primates
- **Do not** scare them by unexpected movements, loud noises and bright lights (or flash photography)
- **Do not** stare or smile at primates
- **Do** respect animal's natural behavioural patterns
- **Do** keep an eye on your personal belongings and those of guests



Elephants

- Do make sure not to offer elephant related activities that are not approved by our sustainability team
- Make sure to ask the product team if the camp you want to offer has been inspected
- Make sure to share our guidelines with the suppliers on inspections
- Make sure to respect EXO Travel Animal Protection Codes of Conduct

In the Wild

- **Do** keep distance at all times!
- **Do not** support wild elephant encounter activities such as feeding and touching
- **Do not** scream or yell if the elephant comes close to your car or else, don't over-react, Move away if you can or just keep quiet and wait
- **Do not** veer off the recommended paths/roads
- **Do not** make loud noises that can scare them
- **Do not** disturb the wild elephants from their daily routines
- **Do not** chase wild elephants, nor support the chasing of the mother for baby elephant encounters
- **Do not** eat elephant meat and do not encourage travellers to buy ivory or any items made of elephant parts

In Captivity

- **Do report to EXO Managers** if one of the following occurs:
 - Elephants ears are pulled
 - Elephants are being forced to carry out unethical activities and show signs of stress
 - Elephants are enclosed in areas in direct sunlight or don't have access to water
 - Elephants are beaten or abused



Diving & Snorkelling

- Make sure suppliers operate with a valid license
- Make sure to avoid overcrowded sites and go elsewhere if there are too many tourists in one site
- Make sure to lower expectations: marine animals may swim away at will
- Make sure suppliers provide safety instructions first. All tourists **MUST** be informed
- Make sure suppliers tell travellers not to touch anything with hands, feet or fins
- Make sure suppliers do not speed up when approaching marine animals
- Make sure that suppliers keep engines in neutral position or above sea level, when marine animals approach the boat closely
- Make sure that supplier approach marine animals from the side, never from the front or the back
- It is unacceptable to force bow-riding – animals should choose to surf the bow
- There is a time of coming and going, leave after 30 minutes on the site



- **Do** tell travellers not to follow marine animals when they swim away
- **Do not** dive alone or let someone dive alone
- **Do not** encourage travellers to feed marine animals or leave behind any food
- **Do not** let travellers touch anything with their hands, feet or fins
- **Do not** encourage travellers to veer off from designated diving areas
- **Do** encourage travellers to respect the instructor's recommendations
- **Do** inform clients about safety
- **Do** tell travellers not to collect anything

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Turtles

- Make sure to work only with responsible organisations for viewing turtles hatchlings
 - Make sure turtles are viewed only at night by tourists in small groups
 - Make sure that suppliers do not 'open up' nests or shine a red light when viewing turtles hatchling on the beach
 - Make sure that suppliers do not disturb turtles on their way to the sea or release them in daytime
-
- **Do tell** travellers not to buy souvenirs made of turtle shell or turtle meat in restaurants
 - **Do not** let travellers touch or disturb turtles when diving or snorkelling with them
 - **Do not** open turtle nests; nests are covered with sand for a reason
 - **Do not** make noise or shine any kind of light when viewing turtles at night

Fishing

- Fishing for a purpose - It is only justified for feeding or supporting the livelihood of fishermen
- Make sure suppliers don't offer to injure and release fish for the sole purpose of entertainment
- Make sure to promote educational activities with information sustainable fishing and/or lessons on how to cook a whole fish limiting food waste etc
- Make sure to avoid fishing activities in the wild where it is possible to catch endangered species
- Prefer fishing farms/closed areas accompanied by local farmers or conservation organisations
- Make sure that fishing does not involve vulnerable or endangered species (IUCN red list), On the list of protected species under country legislation or subject to catching quotas

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Responsibilities



EXO Group To ensure sign off and approval of the new Animal Protection Policy and implementation plan and review any changes.

Sustainability

- To share the Policy with all EXO Travel team members
- To work with product development and contracting teams to oversee and support the auditing of specific animal-related activity providers (desk-based and/or in person)
- In alignment with above, to consult external experts on the potential use of 'mystery shopper' (undercover inspection) visits to review excursions.
- To set a process of tracking and reporting progress
- To ensure NGO and community-based partners of EXO Travel and EXO Foundation align with this commitment.

Product & Operations

- To identify appropriate animal-based excursions in our destinations
- To apply the Animal Protection Policy and ensure all products align.
- To report any excursions or activities that may contradict the Policy Red Lines and report to the Sustainability Team.
- To work with the Sustainability Team to oversee and support any required auditing of specific excursions (desk-based and/or in person)
- In alignment with above, to work with the Sustainability Team to consult external experts about the potential use of 'mystery shopper' visits to review excursion providers.
- To ensure engagement of excursion providers and alignment with supplier code of conduct / Sustainability Addendum.
- To ensure our Tour guides are informed and engaged in sharing our requirements.

Contracting

- To ensure engagement of excursion providers and alignment with supplier code of conduct, including updating supplier service agreements and applying the Sustainability Addendum where necessary.
- To liaise with excursion providers to implement H&S requirements.
- Ensure compliance with national legislation, including H&S requirements.
- To instruct external supplier auditing of excursions/ products if required.

Sales

- To ensure full understanding of the Policy and terminologies used.
- To update guest-facing communications to align with the Policy.
- To work with Marketing team and Sustainability Lead to ensure aligned and accurate messaging, if necessary.

Marketing

- To review all existing communications to check there are no images or text that contradict the Policy.
- To work with the Sustainability Lead to draft key messaging to support accuracy with the Policy.



The logo for EXO TRAVEL is centered on a dark teal background. The word "EXO" is in a bold, sans-serif font, with "EX" in white and "O" in a light green. Below it, the word "TRAVEL" is in a smaller, white, all-caps sans-serif font. The background features abstract, wavy lines in light green and white, primarily on the left side.

EXO
TRAVEL