

# ETHICS

## CODES OF CONDUCT



# OUR ETHICS

Our Ethical Code directs the way EXO Travel does business. It guides us at every step to make decisions that are ethical and important for a healthy business.

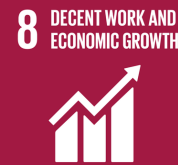
Our Ethical Code is designed to engage EXO in fair relationships with interested parties: customers, competitors, staff, destinations and suppliers.

The code is applicable to all employees including the board of managers. It influences our every decision.

It is the individual responsibility of every employee to follow and comply with the code. In case of any question or concern, employees should seek answers from their direct manager whom should provide answers to such queries and concerns.

**Raising a concern:** if any employee is aware of the violation of this code, she/he should raise it to the relevant manager and through our [online anonymous feedback form](#). All such information will be kept confidential and there will be no retaliation against the employee.

Learn more about our [Essential policies here](#).



# ANTI - CORRUPTION

EXO Travel does not allow corrupt arrangements of any form with customers, suppliers, government officials, or other third parties.

“Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments/ favors or the exchange of “anything of value” and includes the following activities:

- **Bribery**
- **Extortion**
- **Kickbacks**
- **Facilitation payments**

“Anything of value” is very broad and includes for example: goods, services or merchandise, such as gift cards, event tickets, retail certificates, travel perks, use of vacation homes, free airfare or accommodations, special favors or privileges, discounts, free personal services, financial or property loans, or a promise of future employment.

Corrupt activities can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws hence they are strictly prohibited.

Employees should be aware that facilitation payments made to secure or expedite a routine government action by a government official are illegal (typically small, unofficial payments). As well, giving or offering anything of value, even a simple gift or meal to a government official can be illegal.

The company expects its partners to follow EXO's anti-corruption policy while dealing with EXO and will be made aware of EXO's Ethics Code through inclusion in the contract. EXO employees are also prohibited from providing, offering or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

Under certain circumstances an employee may exchange business gifts that are intended to generate goodwill, provided;

- **The gift has a legitimate business purpose**
- **The gift is not cash or a cash equivalent**
- **The gift is given openly in the company's name**
- **The management is informed**
- **The value of the gift remains reasonable (not above \$30)**

Business hospitality, including meals and entertainment, is not prohibited as long as the nature and frequency of the occasion is reasonable and the occasion involves business.

# EMPLOYEES RESPONSIBILITIES

All matters concerning staff rights, duties as well as relations between staff and management are described and collected in Employee Manual documents. Each staff receives a copy of these regulations upon joining EXO Travel.

## **What is not acceptable?**

It is not acceptable for you (or someone on your behalf) to:

- Give, offer, accept or receive, a payment, gift or hospitality with the expectation or hope that a business advantage will be received or given in return to us,
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.



# DRIVING POSITIVE CHANGE

EXO Travel holds suppliers to the same standards of integrity to which we hold ourselves. All suppliers are informed of our Ethical Code when entering a business relation with us. Our suppliers include any third-party vendor, consultant, travel agent, travel agency or service provider.

- **Selection of Supplier:** The selection of suppliers is based on merit, quality of service, reputation and sustainability aspects. Asking for a commission from a supplier/ guides for being selected and used is considered as corruption and is prohibited.
- **Preferred status:** Accommodations and excursions/ activity suppliers which engage actively in sustainability will be highlighted to agents in our communication and marketing efforts. EXO will provide advice to suppliers to assess and improve their sustainability level and will encourage them to become third-party certified on sustainability.
- **Employment conditions:** we ensure that tour leaders, representatives, guides and other locally active staff, contracted by our company and by our business partners understand the terms and conditions of their employment including remuneration. Their contracts comply with local labor laws, do not accept child labor, mention clearly the wages, benefits and other forms of remuneration.
- **Living wage:** Tour leaders, local representatives, guides and other local staff, contracted by our company and our business partners, are paid a living wage that is equal to or above the legal minimum applicable for the relevant destination/area.

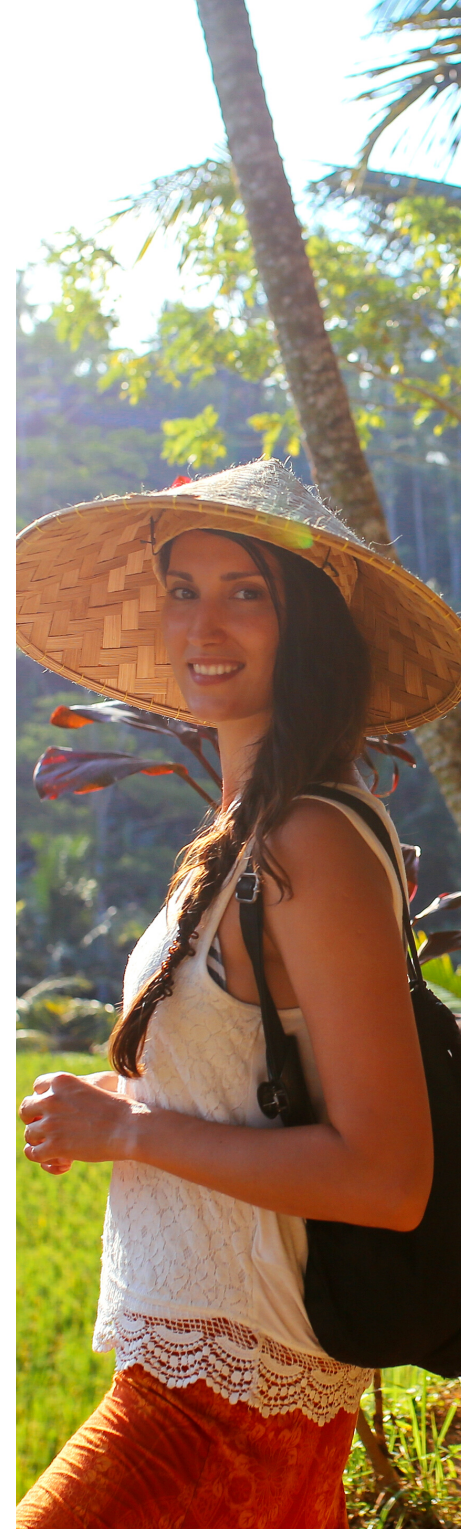




# RESPECTING OUR GUESTS

Integrity requires each of us to treat our guests ethically, fairly and in compliance with all applicable laws. We should always earn the business of the customers on customer service and competitive prices.

- **Guest privacy is not compromised:** we respect customer privacy and take reasonable measures to ensure the security of personal data collected, stored, processed or disseminated.
- **Marketing and advertising messages are not misleading:** they comply with relevant standards and voluntary codes of conduct.
- **Product information is reliable:** we present our services and products in an honest and forthright manner. Product and price information is clear, complete and accurate including sustainability claims. Destination information, including sustainability aspects, is factually correct, balanced and complete.
- **Carbon compensation is included:** automatically in our packages and we strive to lower the carbon footprint of our operations and products in any way possible.
- **Sustainable accommodations, excursions and advice to travellers are indicated:** promoted with logos or other messages. They are recognisable to guests/consumers and presented as the 'better' option. Guests are informed about do's & don'ts in destinations.
- **Certification information is displayed:** guests are clearly informed about the certifications of the company with regards to sustainability, health & safety etc.
- **Clients feedback are managed:** guests are provided the opportunity to share their opinion on specific situations or general ethics and sustainability principles.





# FAIR RELATIONSHIPS

EXO Travel is committed to compete legally and ethically and therefore the following guidelines are being set. EXO Travel and all its employees are to refrain from entering into or carrying out anticompetitive agreements among competitors, including agreements to:

- **Fix prices**
- **Organise rigged bids (collusive tenders)**
- **Establish output restrictions, quotas**
- **Share or divide markets by allocating customers, suppliers, territories or lines of commerce.**

When dealing with competitors, EXO Travel should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales, or engage in any other activity that violates applicable antitrust or competition laws.

EXO Travel is to respect the confidential information and intellectual property rights of our Competitors and other third parties. EXO Travel supports collaborative initiatives with other tour operators to promote sustainability among accommodations in specific destinations or at a global level.



# STEWARDSHIP

EXO Travel intends to remain apolitical and is committed to contribute to its destinations stewardships.

- **Supporting local communities:** EXO Travel intends to include into packages or promote to clients excursions and activities which directly involve and support local communities especially the most vulnerable ones.
- **Support biodiversity conservation:** EXO Travel supports biodiversity conservation, including protected areas and areas of high biodiversity, through for example financial contribution, supporting actions and integration in product offers.

**Sustainable destinations:** Sustainability aspects in destinations are considered in the selection process of new destinations (e.g. traffic-free areas, sustainable city planning, proper waste management infrastructure and community participation). Possibly alternative non-mainstream destinations are offered.