

To build a **sustainable future** in line with the **Ten Principles of the UN Global Compact** Aviapartner wishes to conduct business and build relationships with suppliers respecting human rights, labour rights, environmental protection and anti-corruption.

Scope

This Code of Conduct applies to all businesses that provide products or services to Aviapartner and requires all suppliers and their employees to commit to this Code of Conduct as a condition of doing business.

This code may be amended from time to time. The latest version can be found on the Aviapartner website.

Compliance with Laws, Rules and Regulations

Suppliers shall act at all times in full compliance with applicable laws, rules and regulations and in a manner that does not result in Aviapartner being put in a position where they do not themselves comply with applicable laws, rules and regulations.

Hiring and Employment Practices

Suppliers' hiring practices must include:

Verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available.

In addition, a written contract should be made available to each worker that clearly communicates the conditions of employment in a language understood by the employee.

Legislation regarding working hours and holidays shall be respected and extra hours shall only be possible on a voluntary basis.

The lowest-paid worker shall earn no less than the legal minimum wage.

Suppliers must not discriminate against employees in hiring, promotion and salary or performance management on the basis of race, colour, gender, religion, nationality, age, disability, political affiliation, union membership, sexual orientation, maternity or marital status of the employee.

Suppliers are expected to support diversity and equal opportunity in their workplaces and shall not discriminate.

Suppliers will recognize and respect the freedom of association, and the effective recognition of the right to collective bargaining.

Harassment

Suppliers must treat all workers fairly and ethically with respect and dignity. They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. provide an environment that allows employees to raise concerns without fear of retaliation.

Child Labour

Suppliers shall not employ workers under the minimum legal age of employment in the jurisdiction where work is performed on behalf of Aviapartner.

In the event that local law does not specify a minimum working age, the minimum age of employment shall be 15 years of age. Irrespective of the legal minimum age, employers shall ensure that all legal requirements including type of work, remuneration, working conditions and education requirements are met.

Forced Labour

Aviapartner's suppliers shall not engage in any form of forced labour; human trafficking or exploitation. They shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force, including, but not limited to, the UK Modern Slavery Act 2015. Employee's identification papers or travel documents cannot be retained as a condition of employment.

Health and Safety

Suppliers must provide workers with a safe and healthy work environment and should proactively put in place measures such as policies, procedures, education and communication that support accident prevention and minimise health risk exposure for all employees. The supplier will provide appropriate personal protective equipment together with training on its benefits and use.

Testing of Emergency Procedures

The supplier should minimise the impact to life, environment and property of emergency situations and events through the implementation and testing of emergency plans and response procedures.

Environment

As an ISO 14001 certified company, Aviapartner is fully committed to **minimizing its negative impact** and **making a positive contribution** to the environment. To support sustainable travel for generations Aviapartner aims for a low carbon operation by 2030, complying and going beyond all **legal and environmental requirements**. With its Environmental Management System Aviapartner aims to ensure:

- Full compliance with environmental legislation and legislation directly related to the environment.
- Full compliance with industry, airport and customer requirements related to the environment.
- Identification and operational control of all significant environmental impacts of all activity's products and services.
- Performance targets and objectives for environmental protection and pollution prevention are set and achieved through training and continuous monitoring.
- Increased environmental awareness on all levels throughout the company.
- Contributing with partners to a greener airport.

Aviapartner's strategic environmental objectives and targets are regularly reviewed and updated for our Group of companies and for the individual countries we operate in. sets long-term strategic environmental objectives and targets with focus on continuously improving its environmental performance to become a sustainable ground handler.

The necessary human and financial resources are provided to continuously improve our environmental performance.

The key points of the Aviapartner environmental strategy are:

- **Protection** of the environment
- **Preventing pollution** at all levels
- **Adopting circular solutions, reusing resources and energy** as much as possible and **recycling** where reuse is not possible
- **Minimizing waste** and eliminating **single use plastics**
- **Improving our energy performance, striving for 100% electric vehicles and GSE by 2027**

- Switching to **renewable sources of energy** as soon as possible
- Encouraging **energy efficient solutions** introducing **innovative technologies** everywhere in our operations
- Encouraging the use of **environmental-friendly means of transport** including car sharing for company travel and employee commuting
- Encouraging the adoption of similar principles by our **suppliers** and other **Stakeholders**

For a green company it is important to use and buy green products and services. But being green is not considered sufficient. It is equally important that Aviapartner's suppliers believe in the green approach. This is the only way Aviapartner can really ensure to be a sustainable ground handler.

The supplier expresses its commitment to assimilating the Aviapartner long-term strategic environmental objectives into their own company:

1. Adhere to the principle of environment

The supplier commits itself to support and respect the fundamental principles of environmental protection through the implementation of an environmental policy aimed at alignment with the best practices in the profession.

2. Respect applicable environmental laws and regulations

The supplier undertakes to ensure scrupulous respect of local, national and international regulations in effect as well as general environmental protection principles.

3. Control of the impact of its activities on the environment and adopt a policy of continuous improvement.

The supplier knows the environmental impact of his activities. He must then undertake measures to control the impact of his activities by adopting a process for continuous improvement. This means protecting the environment, preventing pollution at all levels, adopting circular solutions reusing resources and energy as much as possible, recycling where reuse is not possible, minimizing waste, eliminating single use plastic, improving energy performance and switching to renewable sources of energy as soon as possible, striving for energy efficient solutions, minimizing greenhouse gas emissions.

4. Encourage alternative means of transport and car sharing.

The supplier promotes car sharing and environmentally friendly means of transportation such as public transport, cycling etc. with its employees and in its business for company travel and employee commuting.

5. Encourage the adoption of similar principles by own suppliers and stakeholders.

The supplier promotes these principles when dealing with its own suppliers, service providers and/ or sub-contractors.

6. Take the environment into account when taking important management decisions. The supplier considers the environment as an extra angle in the decision-making process.

Gifts

Suppliers are not allowed to offer gifts to Aviapartner employees.

Improper Payments / Bribery

Bribery is offering or making a payment (or payment in kind) and/or offering/promising a gift to influence a decision dishonestly or to induce or reward a person for improper performance of any relevant function or activity. This includes both private and public bribery. It is unacceptable to give, offer, promise or accept bribes or other improper payments and favours.

Employees, suppliers and sub-contractors acting on behalf of Aviapartner are strictly prohibited from accepting bribes, improper payments and favours under any circumstances. Aviapartner suppliers must comply with all relevant anti-bribery laws.

Anti-trust and Competition Laws

Aviapartner is committed to comply strictly with all applicable antitrust and competition laws while doing business and expects its Suppliers and employees to equally commit to competition law rules.

Conflict of Interest

Any possible conflict of interest shall be notified immediately to Aviapartner.

Confidential Information

Proper management of confidential information is critical to the success of both Aviapartner and its and suppliers.

Aviapartner suppliers must protect all Aviapartner information, data (including personal data), and intellectual property or technologies with appropriate safeguards. Suppliers may receive our confidential information only as authorised by a confidentiality or non-disclosure agreement and must comply with their obligations not to disclose the confidential information, not to use the information except as permitted by the agreement, and to protect the information from misuse or unauthorised disclosure.

Personal Data Protection

Proper management of personal data is also critical to the success of both Aviapartner and its and suppliers.

Aviapartner is committed to carefully process personal data in strict compliance with all applicable data protection legislation, including but not limited to the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR"). Aviapartner strictly adheres to all applicable legal, regulatory and contractual requirements regarding the collection, processing, and transmission of sensitive data such as Personally Identifiable Information (PII) and expects of all suppliers to do the same. Suppliers must ensure that organizational records are protected, safeguarded, and disposed of securely.

Under the GDPR, a Data Processing Agreement (DPA) must be signed between supplier and Aviapartner if that supplier processes personal data on Aviapartner's behalf (and thus act as a processor in the sense of the GDPR). If such an agreement is not in place, suppliers must notify Aviapartner thereof immediately. More generally, all suppliers must comply with the abovementioned data protection legislation. This includes - amongst other things - the obligation to respect data subject rights. Suppliers must report to Aviapartner in the event of a security breach within 24 hours.

This requirement prevails beyond contract expiry or termination.

Access control

Suppliers are prohibited from accessing Aviapartner's information security assets until a contract containing security controls is agreed to and signed by the appropriate parties.

Compliance and Continuous Improvement

Suppliers are expected to have a management system that ensures they comply with applicable laws, regulations, and policies, conform to this Code of Conduct, and identify and reduce risks related to this code. The system should also promote continuous improvement and compliance with changing laws and regulations. Workers should be offered the possibility to contribute to such improvement with anonymous suggestions.

Supply Chain transparency and audit rights

Supply chain transparency is a pre-requisite to confirm compliance to this Supplier Code of Conduct. The supplier therefore agrees that Aviapartner may carry out audits and inspections to verify the application of this Code of Conduct.

Aviapartner may also request documentation to verify compliance and participation in Supplier Self Assessments and evaluations.

Aviapartner may choose to audit ICT suppliers to ensure compliance with applicable security policies, as well as legal, regulatory and contractual obligations.

This may result in corrective actions and opportunities for improvement to which the supplier shall give its full commitment.

Communication

The supplier agrees to enforce this Code of Conduct by communicating its principles to its employees suppliers and third parties throughout their supply chain.

Non-Compliance Reporting

Where it is allowed by law, suppliers should have a system that allows employees to anonymously report their concerns.

Violations of this Code of Conduct can be reported confidentially by contacting the Aviapartner HQ Legal Team.

AGREEMENT AND SIGNATURE

I, undersigned, _____(name)_____ (title)
on behalf of _____(company), hereby confirm and accept the Aviapartner
Supplier Code of Conduct.

Date of signature: _____,20__.