

Aviapartner is committed to being a source for good and contributing to sustainable travel for generations. This includes conducting business and building relationships with suppliers respecting human rights, labour rights, environmental protection and anti-corruption.

This Supplier Code of Conduct is based on the Ten Principles of the UN Global Compact.

This document shall remain valid for a period of three years from the date of signature. This code may be amended from time to time. Any amendments or updates will be communicated to the Supplier and published on Aviapartner's website. Suppliers may raise any concerns or objections within the period specified in the notification. Unless such concerns or objections are received within that period, the revised version shall be deemed accepted and shall supersede and replace all previous versions of this document.

Scope

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

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 selection, promotion and salary or performance management on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, gender, nationality, political affiliation, union membership, maternity or marital status, same-sex partnership status of the employee, family status, disability or the receipt of public assistance.

Non discrimination awareness training is required for staff

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

Suppliers shall 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 and provide an environment that allows employees to raise concerns without fear of retaliation.

They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse.

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.

Upon request, Suppliers shall prove appropriate business continuity and disaster recovery arrangements proportionate to the services provided.

Environment

Aviapartner is fully committed to **minimizing the negative environmental impact** of its activities while **contributing to environmental improvement** whenever possible. To support sustainable travel for generations to come, we aim to achieve a low-carbon operation for Scope 1 and Scope 2 emissions by 2030, complying with all **legal and other environmental requirements and going beyond**.

Aviapartner's ISO14001 certified Environmental Management System 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.
- Environmental awareness on all levels throughout the company.
- Promoting environmentally responsible practices throughout the value chain.

Aviapartner's long-term strategic environmental objectives and targets are regularly reviewed and aligned with the targets and objectives of the countries in which we operate. 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 by reusing resources and energy where possible and recycling when reuse is not feasible.
- Minimizing waste and eliminating single-use plastics.
- Improving our energy performance, striving to transition to 100% electric vehicles and GSE by 2027.
- Switching to renewable energy sources as soon as possible by expanding green electricity contracts to all stations where conditions allow and using HVO100 biofuel instead of fossil fuel where available.
- Encouraging the introduction of innovative energy-efficient technologies across our operations.
- Facilitating the use of environmentally friendly means of transport including car sharing for business travel and employee commuting.
- Promoting environmentally responsible practices by our suppliers and other Stakeholders throughout the value chain.

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

1. Adhering 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. Respecting 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. Controlling the impact of their activities on the environment and adopting a policy of continuous improvement.

The supplier knows the environmental impact of their activities.

The supplier must undertake measures to control the impact of these activities by adopting a process for continuous improvement. This means implementing mitigating actions to protect the environment and prevent pollution at all levels, adopting circular solutions for reusing resources and energy as much as possible, minimizing waste, eliminating single-use plastic, recycling where reuse is not possible, improving energy performance, transitioning to environmentally friendly transportation solutions to minimize greenhouse gas emissions, opting for electric vehicles, using green electricity and HVO100 biofuel instead of fossil fuel where available.

4. Facilitating the use of environmentally friendly means of transport including car sharing for business travel and employee commuting.

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

5. Promoting environmentally responsible practices by our suppliers and other Stakeholders throughout the value chain

The supplier promotes these principles when dealing with others in the supply chain such as its own suppliers, service providers and/ or sub-contractors.

6. Taking 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.

Export Controls and Sanctions

Suppliers shall comply with all applicable export control, trade compliance and economic sanctions laws and regulations. Suppliers must not directly or indirectly engage in any transaction, business relationship or activity that would cause Aviapartner to violate applicable sanctions or export control requirements.

Suppliers shall promptly notify Aviapartner if they become subject to sanctions, export restrictions, governmental investigations relating to trade compliance, or if any circumstance arises that may reasonably affect their ability to comply with such requirements.

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.

Information Security

Aviapartner expects its suppliers to implement appropriate technical and organisational measures to protect information, systems and services against unauthorised access, disclosure, alteration, loss, destruction or disruption.

Suppliers shall maintain information security practices appropriate to the nature, size and risk profile of their activities. In that respect they shall:

- Protect Aviapartner information and assets from cybersecurity threats and unauthorised access.
- Ensure that employees and contractors with access to Aviapartner information are authorised and adequately trained and under contractual confidentiality obligations.
- Implement controls to protect the confidentiality, integrity and availability of information.
- Promptly notify Aviapartner of any information security incident, cyberattack, data breach or other security event that may affect Aviapartner information, systems or services.
- Cooperate with Aviapartner in the investigation and remediation of security incidents affecting Aviapartner.
- Implement sufficient processes for vulnerability management, timely security patching and protection against known cyber threats.
- Refrain from using Aviapartner confidential information, personal data or intellectual property for training artificial intelligence systems without Aviapartner's prior written approval.
- 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.

Failure to comply with the requirements of this Code of Conduct may result in corrective action requests.

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 ask to conduct a Supplier self-assessment to manage and monitor the level of performance. Aviapartner may also carry out audits and inspections to verify the application of this Code of Conduct. This will help to determine whether Aviapartner's requirements are met and where support can be provided.

Aviapartner may request documentation, information and other evidence reasonably necessary to verify compliance with this Supplier Code of Conduct and participation in Supplier Self-Assessments, evaluations, audits and assurance activities at any time.

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 the principles of this code of conduct to its employees, relevant suppliers, subcontractors and any third parties in their supply chain supporting the delivery of services to Aviapartner or extending minimum equivalent requirements.

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 or reporting via the external Whistleblowing tool using following link : [AviaPartner Belgium](#)

AGREEMENT AND SIGNATURE

I, undersigned, on behalf of my Company, have read and understood this Supplier Code of Conduct. I agree to comply with the standards laid out in this Code and to commit to the continuous progress of my Company on the sustainability topics covered by this Code of Conduct.

Company name:

Signed by:

Name:

Title:

Date:

Signature