

# Travel Chapter Supplier Code of Ethics

## Introduction

Travel Chapter conducts business in a responsible and sustainable way which means doing the right thing for our people, our business, the environment, animal welfare and the community. We continually strive to improve our social and environmental performance with the objective of ensuring that our activities contribute to sustainable development.

We encourage Suppliers to comply with the principles as set up in the Supplier Code of Ethics and we are grateful to Suppliers for their full support and understanding in this regard. Please note that the terms set out in this Supplier Code of Ethics are in addition to any other commercial or contractual terms agreed with Travel Chapter

## Compliance with Laws

Suppliers shall comply with all applicable laws and regulations of the countries in which operations are managed or services provided.

## Human Rights

Suppliers are expected to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organisation (ILO) conventions.

- Child Labour

Suppliers must ensure that illegal child labour is not used in the performance of work and is consistent with the minimum working ages defined by the International Labour Organisation (ILO). There shall be no recruitment of children (below 15 years of age unless local law stipulates higher age, in which case higher age shall apply). Children and young persons under 18 shall not be employed at night or in hazardous conditions.

- Human Trafficking, including Forced or Indentured Labour

Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate, in compliance with the UK Modern Slavery Act 2015.

## Employment Practices

- Harassment

Suppliers are expected to ensure that their employees are offered an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

- Non-discrimination

Suppliers are expected to provide equal employment opportunities to employees and applicants for employment without discrimination. There should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

- Compensation and working hours

Suppliers must comply with appropriate wage and hour labour laws and regulations governing employee compensation and working hours.

Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

- Whistle-blower protection and social dialogue

Suppliers are expected to provide an anonymous complaint mechanism for managers and workers to report workplace grievances.

Suppliers must respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

## Anti-Bribery

- Anti-Corruption Laws

Suppliers must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business.

Suppliers are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements.

Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage and comply with the UK Bribery Act 2010 and any other applicable laws in the countries in which they operate.

## Conflicts of Interest

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest.

Suppliers are expected to provide notification to all affected parties if an actual or potential conflict of interest arises.

## Maintain Accurate Records

Suppliers are expected to maintain accurate records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records made or received as evidence of a business transaction must fully and accurately represent the transaction documented. Records should be retained based on the applicable retention requirements.

## Data Protection

- Confidential/Proprietary Information

Suppliers shall properly handle sensitive information, including confidential, proprietary and personal information. Information should not be used for any purpose other than the purpose for which it was provided.

- Intellectual Property

Suppliers must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

- Information Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.

Suppliers must comply with applicable data privacy laws including General Data Protection Regulation. Any potential or actual breaches involving the exposure of Data without our consent needs to be reported immediately to [dpo@travelchapter.com](mailto:dpo@travelchapter.com)

## Environment, Health and Safety

- Environment

Suppliers are expected to maintain effective policies and procedures to manage their environmental impact. This includes working to reduce their environmental footprint through conservation of resources, such as the use of energy, water and materials, as well as working towards waste reduction within their operations and own supply chain.

Suppliers must also aim to have a positive impact on the communities in which they operate.

- Health and Safety

Suppliers should protect the health, safety, and the welfare of their employees, contractors, visitors and those in the community who may be affected by their activities. Suppliers shall comply with all applicable environmental, health and workplace safety laws and regulations.

- Risk Assessment and Risk Managed

Suppliers shall have a process to identify the environment, health and safety and labour practice and ethics risks associated with their operations. This process shall determine the relative significance of each risk and the implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.