

Travelopia

Travelopia Supplier Code of Conduct

January 2022



ABOUT THIS DOCUMENT

We aim to provide our customers with the best specialist holidays in the world and ensure they have memories to last them a lifetime. In pursuing this goal, we are committed to upholding the highest standards of ethics, honesty and integrity in our activities and to compliance with all applicable legislation.

In delivering quality holidays for our customers, we rely upon many different suppliers – from airlines and I.T providers to expedition companies – and everything in between. Whilst our suppliers often vary in size and the services they provide, our expectations of them do not.

As part of our standard terms and conditions, we require that suppliers abide by all applicable legislation. This Code of Conduct goes further and sets out the minimum standards of behaviour we expect suppliers to adhere to when carrying out work for us. We reserve the right to modify this Code of Conduct from time to time.

The requirements for you as a supplier are clear – comply with legislation and follow Travelopia policies and procedures and the standards outlined in this document. If you are ever asked to do anything which falls outside our standards, then we want to hear about it.

We may investigate conformity with this Code of Conduct and in cases of suspected non-compliance, take such action as we deem appropriate.

Please help us to always do the right thing.

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Introduction to Our Standards

We expect our suppliers to a) adhere to the standards set out in this Code of Conduct; b) ensure that its workers are aware of this Code of Conduct and comply with it and c) ensure these standards (where relevant) are included in agreements within their own supply chain and that measures are in place to monitor compliance. Failure to abide by this Code of Conduct could result in termination as a Travelopia supplier.

Compliance with Laws and Regulations

Suppliers must comply with all applicable international, national and local legislation and regulations, as well as any industry minimum standards. Furthermore, we expect suppliers to implement and maintain systems and controls to ensure compliance, such as policies, training, monitoring and auditing. The Supplier shall report any breaches (actual or suspected) of this Code of Conduct as soon as possible to your Travelopia contact.

Travelopia may conduct audits to verify the Supplier's compliance with this Code of Conduct. Travelopia has no obligation to conduct such audits.

Bribery and Corruption

Travelopia takes a zero-tolerance stance on bribery & corruption. We require all suppliers to comply with applicable bribery and anti-corruption laws, including but not limited to, the U.S. Foreign Corrupt Practices Act 1977 and the UK Bribery Act 2010.

Suppliers must not permit intermediaries, agents, subsidiaries, joint ventures or any other third party performing services on their behalf or that of Travelopia to engage in bribery or corruption. You must not offer or accept, promise, pay, permit, or authorise any

bribes, kickbacks, facilitation payments or other improper or unlawful payments. This includes cash, cash equivalents (such as gift cards of any denomination), gifts, services, or other inducements intended to secure an improper business advantage.

These requirements apply in all circumstances, but suppliers should be especially cautious in any dealings involving government officials, political candidates, or other public figures or entities.

Tax Evasion & Facilitation of Tax Evasion

Travelopia takes a zero tolerance approach to tax evasion and the facilitation of tax evasion. Both of these are criminal offences in the UK and can be punishable with imprisonment and/or unlimited financial penalties, depending upon the seriousness of the offence. You must not ask or encourage any activity which could result in the illegitimate reduction or diversion of any taxes from any collecting authority.

Human Rights & Modern Slavery

Travelopia acts in accordance with all anti-slavery, human trafficking and human rights legislation and expects its suppliers to do the same and also act in accordance [Travelopia's Minimum Standards for Sustainable & Responsible Travel](#)

Confidentiality

Suppliers must comply with all applicable laws and regulations governing confidential and proprietary information and take all necessary measures to safeguard all information that they receive from Travelopia and/or Travelopia associates.

Data Protection & Information Security

Suppliers must comply with applicable data

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protection, privacy and information security laws and codes of practice, including but not limited to the General Data Protection Regulation. Suppliers must implement appropriate policies and procedures for protecting customer, client and employee data.

Suppliers must ensure that they create, retain, and dispose of personal data in accordance with applicable standards. We also expect them to assist Travelopia with any data protection requests and in the management of data breaches.

We expect all of our suppliers to comply with all applicable information security measures as may be further detailed in our contract.

Competition and Anti-Trust Laws

All of our suppliers must comply with applicable competition laws in particular, suppliers must not fix prices, rig bids with competitors or participate in a cartel. This includes a prohibition on exchanging current, recent or future pricing information with competitors or passing on any such information received from Travelopia.

Environment

Suppliers must abide by all applicable environmental laws and Travelopia's Minimum Standards for Sustainable & Responsible Travel which can be found [Travelopia's Minimum Standards for Sustainable & Responsible Travel](#)

Money Laundering

Money Laundering is the criminal practice of filtering money which has come from illegal activities through a series of transactions in order to give the appearance of being from legitimate sources. Travelopia takes a zero-tolerance approach to its Suppliers being involved in such illegal/illicit activity, and we

expect them to not engage in money laundering practices and fully comply with all relevant anti-money laundering legislation..

Health and Safety

Suppliers must comply with applicable local health and safety regulations. This means implementing measures to ensure that all activities are undertaken safely, with no detriment to the wellbeing of employees, customers or other relevant persons. We expect any incidents and near misses to be reported. We also expect Travelopia Suppliers to take a proactive, cooperative attitude towards health and safety, in addition to implementing contractual requirements.

International Trade Sanctions

Suppliers must comply with all applicable economic sanctions programs. Under no circumstances may our suppliers interact with any sanctioned countries, entities or individuals to facilitate the provision of their services to Travelopia. Suppliers must inform Travelopia of any relevant restrictions on the export of their products, services, software, technology, or technical data.