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Avolta AG, together with the Avolta Group companies (collectively, "Avolta"), is a leading global travel experience player with more than 5,500 travel retail and travel F&B outlets in over 75 countries on six continents. As such, Avolta is committed to conducting its operations in an ethical and legal manner in compliance with accepted business standards and applicable laws and regulations with respect to anti-corruption, human rights, worker health & safety, the environment, and product safety.

## (III) Avolta

## Avolta Principles

Any person wishing to become a business partner of Avolta, or who is already a business partner of Avolta, must ensure that he or she complies with the principles described below.

# Avolta Supplier Code of Conduct

Avolta AG, together with the Avolta Group companies (collectively, "Avolta"), is a leading global travel experience player with more than 5,500 travel retail and travel F&B outlets in over 75 countries on six continents. As such, Avolta is committed to conducting its operations in an ethical and legal manner in compliance with accepted business standards and applicable laws and regulations with respect to anti-corruption, human rights, worker health & safety, the environment, and product safety.

Avolta requires its Suppliers to comply with the provisions of this Supplier Code of Conduct (the "Code of Conduct"), which is based on the Universal Declaration of Human Rights adopted by the United Nations General Assembly in 1948, the fundamental Conventions of the International Labour Organization (ILO) and the Rio Declaration on Environment and Development adopted in 1992.

Suppliers shall ensure disclosure of the relevant parts of this Code of Conduct to their employees, agents, subcontractors and suppliers (if appropriate), and agree that their employees, agents, subcontractors and suppliers (if appropriate) will comply with all material aspects of this Code of Conduct that are relevant to the party's agreement(s). Suppliers are expected to duly perform third-party due diligence towards their sub-tier suppliers and to implement monitoring mechanisms, for example through audits. Each supplier further agrees to immediately report to Avolta issues it becomes aware of that could negatively affect the quality of Avolta's products or services or public perception in any way.

#### **Ethics and integrity**

Avolta requires its Suppliers to adhere to high standards of ethical conduct and to comply with all applicable laws and regulations, which may include the OECD Convention on Controlling Bribery of Foreign Public Officials in International Business Transactions, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act, among others.

Avolta further requires Suppliers to disclose to Avolta (at compliance@avolta.net) any situation of which they become aware of that could be considered to be a conflict of interest in its business relationship with Avolta, including any relationship between such supplier, its directors, employees, agents and/or subcontractors and those of Avolta.

Suppliers shall comply with this Code of Conduct. Compliance with the provisions of this Code of Conduct must be considered an essential part of the obligations assumed on any basis whatsoever and for all intents and purposes by Suppliers towards Avolta.

To ensure compliance with the Code of Conduct, Avolta has the right to monitor the fulfilment of the provision, including by asking Suppliers to provide the appropriate documentation.

## Labour and employment practices and working conditions.

Suppliers shall not supply any products or services to Avolta that have been manufactured, assembled or packaged in violation of internationally accepted human rights standards and applicable laws as well as regulations in relation to labor and working conditions. In particular:

- **No Child Labour:** Suppliers shall not employ minors below the age of 16 years. Where local laws specify a higher minimum age, the latter must be adhered to.
- No forced or bonded labour: Suppliers shall ensure that there is no slavery, human trafficking or forced labor of any type in their supply chain. This includes involuntary prison labor and any situation requiring employees to give up their ID prior to commencing employment.
- Freedom of association and collective bargaining: Suppliers shall respect the rights of employees to form and join trade unions and bargain collectively in accordance with applicable law.
- Compensation: Suppliers shall fairly compensate their employees by providing wages and benefits in accordance with applicable laws. Wages should in no event be below the minimum legal or collective bargaining agreement amount.
- Discrimination: Suppliers shall treat their employees equally and fairly, and shall not discriminate against them on the basis of race, color, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, political orientation, or disability, or any other classification or status protected by applicable laws and regulations.
- Health and Safety: Suppliers shall provide their employees with a safe and healthy working environment and, if applicable, safe and healthy living quarters. Health and safety risk assessments shall be conducted to identify and then address potential hazards and Suppliers shall take effective steps to prevent, minimize, or eliminate potential hazards leading to harm. Suppliers shall meet or exceed applicable laws and regulations and industry standards in this area.
- **Working hours:** Suppliers shall ensure that the working hours of their employees are in line with applicable industry standards, laws and regulations.
- Harassment and abusive behavior: Suppliers shall prohibit all forms of abuse, inhumane or degrading treatment, corporal punishment or any other form of intimidation.

## Anti-money laundering and anti-terrorism

Suppliers shall comply with all applicable laws and regulations concerning anti-money laundering and anti-terrorism, as well as the anti-corruption principles as stated in Avolta's Code of Conduct, publically available on the Group website: Sustainability | Avolta

## Environmental compliance and sustainability

Suppliers shall comply with all applicable industry standards, laws and regulations in relation to the environment. Each Supplier shall include the goal of decreasing its environmental impact as a consideration in business decisions, including its own supply chain. As a member of the United Nations Global Compact, Avolta also encourages its suppliers to support a precautionary approach to environmental matters and to collaborate with Avolta on initiatives to minimize the environmental impact of the products they supply to Avolta.

## **Product quality & safety**

Suppliers shall comply with the applicable industry standards, laws and regulations in relation to quality, product safety and good manufacturing practices. Suppliers must be capable of tracing their source of supply at least one level back in the supply chain and have a documented recall process.

### **Record keeping**

Suppliers shall maintain financial, operational and business records in accordance with applicable legal requirements and generally accepted accounting practices.

#### **Reporting concerns**

Supplier shall have or will establish a procedure for employees to report unethical actions regarding the workplace, and shall not discipline or discriminate against employees reporting unethical actions.

#### **Declaration of compliance**

We, the undersigned agree to:

1. Comply with the provisions of Avolta's Supplier Code of Conduct and to implement it throughout our supply chain; and

2. Timely bring to your attention (at compliance@avolta.net) any material breach of applicable human rights, labor, environmental, health and safety, product safety, anti-money laundering & anti-terrorism, and record keeping legislation or any other material breach of the provisions of this Supplier Code of Conduct in relation to products we supply to Avolta.

Company Name:		
Signature:		
Name:		
Title:		
Date:		

Please return a pdf of the signed declaration to sustainability@avolta.net

#### Address Corporate Headquarter

Avolta AG Brunngässlein 12 P.O. Box 4010 Basel Switzerland

Phone +41 61 266 44 44

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