

SUPPLIER CODE OF CONDUCT

DER TOURISTIK GROUP

Preamble

As an international travel company, DER Touristik Group is aware of the responsibility it has towards host countries, their cultures and its customers, partners, employees and society. Corporate governance geared to responsible and long-term value creation is therefore the basis for DER Touristik's commitment to sustainability. DER Touristik Group aims to uphold the very highest standards for corporate conduct and ensures compliance with them at all times. It acts in an ethical and sustainable manner to ensure that it and its partners protect the interests of society and the environment.

The Supplier Code of Conduct specifies the requirements demanded of all suppliers, i.e. service providers, of DER Touristik Group. Apart from economic criteria, business ethics, compliance with human rights and labour standards, protection of the environment and animal welfare are key criteria we apply in selecting our business partners and assessing new and existing business relationships. The Supplier Code of Conduct applies to all regions of the world where DER Touristik Group operates. We expect all our business partners and their employees to ensure compliance with these requirements.

The purchasing agent shall reserve the right to review compliance with the Supplier Code of Conduct with the help of self-assessment questionnaires and/or audits conducted in the business sites of the supplier. The service provider shall be obligated to support this process.

1. Compliance with the law

Service providers shall comply with all laws applicable to their company, irrespective of whether or not compliance is monitored by government authorities. That applies to domestic, foreign or supranational laws, ordinances, conventions or other regulations. If the provisions in this code of conduct or international legal regulations and conventions deviate from local regulations, the more stringent provision shall always apply.

2. Ban on corruption and bribery

DER Touristik expects service providers to conduct their business in an ethical and responsible manner and compete fairly. Corruption and bribery shall not be tolerated in any form whatsoever. Suppliers must ensure that adequate procedures to avoid conflicts of interest are in place.

3. Protection of children against sexual exploitation

Service providers shall take suitable measures to ensure that their business operations or premises are not used for the purpose of child prostitution, to procure children for sexual purposes, or to produce, disseminate or store pornographic material involving minors.

Suspicious conduct by guests, employees, employees of a supplier's business partners or other persons that is observed on the premises of the supplier or during excursions or brought to the attention of the supplier must be reported by the supplier to the local law enforcement authorities.

DER Touristik reserves the right to terminate the contract with a supplier without notice if it obtains knowledge that the supplier facilitates or tolerates criminal acts, such as sexual exploitation of children.

4. Respect for human rights and compliance with social standards

Service providers shall comply with the fundamental employee rights defined under prevailing national legislation and acknowledge the Core Labour Standards of the International Labour Organization (ILO), taking into account the laws and legal forms applicable in/at the different countries and locations.

4.1 Forced labour

This shall include a ban on forced labour, slave labour or involuntary prison labour.

4.2 Child and youth labour

Service providers must not use child labour. They are urged to comply with the ILO Conventions as the basic standard relating to the minimum age for admission to employment and on the prohibition of child labour. Children's development must not be impeded. Their education, safety and health must not be impaired.

4.3 Discrimination

Service providers must create a working environment that is free of harassment and discrimination and in which all employees are treated with dignity and respect. Discrimination on grounds such as descent, origin, nationality, skin colour, religion, ideology, political or trade union activity, gender, sexual orientation, age, handicap, illness or marital status shall not be tolerated.

4.4 Fair treatment

Harsh and inhumane workplace practices are not permitted. Physical abuse, punishment or the threat of physical abuse or punishment, any type of sexual or other harassment, and other forms of intimidation are prohibited.

4.5 Compensation and working time

Service providers shall comply with all prevailing national laws and binding industry standards relating to wages and salaries and fringe benefits. The working hours and non-working times must at least comply with the prevailing law, the industry standards or the relevant ILO Conventions, whichever regulation is stricter.

Service providers shall ensure that a comprehensible, written contract of employment that clearly defines the terms and conditions of employment in a language the employee understands is concluded with employees before they commence work.

Employees must not be asked to lodge security or accept delays in payment of wages. Service providers shall ensure that employees do not pay any brokerage fees to third parties for conclusion of the contract of employment.

4.6 Occupational safety

Service providers shall ensure health and safety at the workplace at least to the extent defined by applicable national regulations. They shall support continuous improvement measures in the field of occupational health and safety.

4.7 Freedom of association

Service providers shall recognise the right of all employees to organise and bargain collectively.

5. Environmental standards

Service providers shall comply with national laws, regulations and standards relating to protection of the environment.

Service providers shall act responsibly in order to protect the environment. They shall minimise potential negative impacts of their business activity on the community, environment and natural resources and encourage measures to re-use and recycle resources. Service providers are required to continuously improve protection of the environment in their business processes. In this regard, we view the existence of suitable environment management systems as an advantage.

Procedures and standards for waste management, for the handling and use of chemicals and other hazardous substances and their disposal, and for emissions and waste water treatment must be observed.

6. Animal welfare

Animals must be treated as sentient beings and be accorded the necessary respect and protection so as to ensure their well-being. Animals in captivity must be kept under conditions that are appropriate to their species and allow them to behave normally, and must not be abused or forced into unnatural behaviour. Suppliers must fulfil the minimum requirements for keeping animals in a manner appropriate to their species, as defined by the Association of British Travel Agents (ABTA).