
Terms and Conditions for Hotel Procurement Contracts

Supplier Code of Conduct

EXHIBIT 2 TO THE MAIN CONTRACT

Introduction

DER Touristik Nordic and its subsidiaries (herin collectively referred to as 'Apollo') acknowledge their responsibility towards society to be a good corporate citizen. Besides compliance with applicable laws the focus issues for corporate responsibility within Apollo are: its employees, sustainable supply chain management, sustainable products, human and labour rights, natural resources and climate change and governance and compliance. In order to reach its goals in the field of Corporate Responsibility, Apollo cooperates closely with its own employees, customers, partners such as NGOs, suppliers as well as the local people at the destinations.

This Supplier Code of Conduct serves as guideline to a standard of ethical conduct, values and principles Apollo expects its hoteliers, cruise ship operators, excursion providers and any other suppliers (herein referred to as 'Supplier' or collectively as 'Suppliers') to adhere to when operating for or on behalf of Apollo. This Supplier Code of Conduct forms an integral part of Apollo contracts with its Suppliers. Further, each Supplier shall procure that all persons working for the Supplier (whether employed or not) comply with this Supplier Code of Conduct and that all such persons are appropriately qualified, trained and have the necessary skills and expertise to perform their obligations under this Supplier Code of Conduct.

1. Compliance with Applicable Law

1.1 In General

Apollo expects its Suppliers to comply with all applicable international, national and local laws and regulations, industry minimum standards and any other relevant statutory requirements whichever requirements are more stringent.

1.2 Anti-Bribery and -Anti-Corruption

- Supplier shall comply with all applicable laws, statutes, regulations, codes, etc. relating to anti-bribery and anti-corruption.
- Supplier shall refrain from engaging in any form of bribery or corruption (incl. facilitation payments) when dealing with private parties or public officials. In particular, Supplier shall not offer, provide, authorise, request or receive any financial or other advantage (i.e. gifts or hospitality) with the intent or prospect of influencing or determining the recipient's decision-making or other conduct and/or as an inducement or reward for the improper performance of a person's relevant function.
- If Supplier acts on behalf of Apollo and becomes aware of any suspicious, risky or corrupt conduct, he/she must immediately report it to and follow any instructions by Apollo.

- Supplier shall monitor and control wastewater and solid waste generated and shall treat it as required prior to discharge or disposal.
- Supplier shall reduce waste of all types to the greatest extent reasonably possible.
- Supplier shall comply with the animal welfare standards outlined in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and in ABTA's Animal Welfare Minimum Requirements.

3. Human Rights & Labour conditions

3.1 Basic rights

- Supplier shall not discriminate its employees based on gender, age, religion, race, tribe, caste, social background, disability, nationality, membership in workers' organisations, political affiliation, sexual orientation, or any other personal characteristics.
- Supplier shall ensure that all its employees are free to enter their employment with the Supplier through their own choice and shall also be free to terminate their employment when they choose without penalty, as long as the process is in accordance with the (oral or written) employment contract.
- Supplier shall not make use of any form of forced labour.
- Supplier recognizes the freedom of association and the right to collective bargaining.
- Supplier does not engage in any workplace practice and conditions which violate basic rights; Physical abuse or punishment or threat of physical abuse or punishment, any kind of sexual or other harassment and other forms of intimidation are prohibited.
- Supplier provides a complaints procedure through which employees can make representation to senior management about key employment issues, raise grievances (including those about harassment) and seek redress.

3.2 Child labour

- Supplier shall not employ children younger than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age applies. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower age applies.
- If Supplier employs young people between the age of 14 and 18, the Supplier shall treat them with particular consideration, for example by restricting their working hours.

3.3 Safe workplace

- Supplier shall provide a safe and hygienic working environment. Supplier shall take adequate steps to prevent diseases, accidents and injuries arising during work;
- If housing is provided by Supplier, this has to be in line

2. Environment

- Suppliers shall minimize their negative impact on the environment.
- Supplier shall actively reduce the amount of energy and water used and shall minimize the use of chemicals known to cause damage or pose risks to health and/or the environment.
- Supplier shall comply with mandatory national and international law, particularly in regard to the procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment.

with local and national laws and standards.

- Supplier shall ensure that fire alarms, fire extinguishers, unobstructed emergency exits are provided in all areas, including staff facilities. Evacuation drills must be part of the employees' training and repeated regularly.

3.4 Wages and working hours

- Wages paid by the Supplier must meet or exceed legal minimums and/or industry standards. No illegal or unauthorised deductions from wages are allowed.
- Working hours of employees must be in line with the legal requirements and / or industry standards.
- Supplier shall grant employees their stipulated annual leave and sick leave without any form of repercussions.

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- Supplier shall grant female employees their stipulated maternity leave and other rights in case of pregnancy.

4. Sexual Exploitation of Children and Adolescents

4.1 Policy

- Supplier shall not allow or tolerate any child prostitution at its premises and facilities.
- Supplier shall report any suspicious behaviour from guests, employees, staff from suppliers of the Supplier or any other person on the Suppliers premises or during excursions to the competent local authorities.

4.2 Definition

For the purpose of this section 4 'child' is defined as a person younger than 18 years according to the UN Convention on the Rights of Child.

5. Local Sourcing and benefiting communities

- Supplier shall actively purchase locally produced goods in preference to imported ones wherever reasonably possible.
- Supplier shall promote local products and services to guests, by recommending guides, restaurants, markets and craft centres wherever this is safe and reasonably possible.

6. Monitoring & Enforcement

6.1 Principle of Trust

As a principle, Apollo trusts its Suppliers to respect the terms and conditions of this Supplier Code of Conduct and to do their utmost to achieve Apollos standards.

6.2 Sphere of Influence

- Supplier shall ensure that the principles set forth herein are communicated, implemented and adopted within its own business environment. Supplier shall involve its employees, management and other stakeholders such as the communities as required and appropriate.
- Supplier is encouraged to take steps to promote adherence to this Supplier Code of Conduct throughout its own supply chain. However, Suppliers' sub-contractors are not bound by the terms of this Supplier Code of Conduct.

6.3 Monitoring

- When being prompted, Supplier shall report by way of a self-assessment about its compliance and progress in all matters mentioned herein. Supplier shall complete the self-assessment forms provided by Apollo fully, promptly and accurately.
- Supplier agrees that its premises and facilities may be inspected and its compliance may be audited at any time by Apollo and/or its representatives (including third parties appointed by Apollo). Supplier shall support such audit as far as reasonably possible.

6.4 Non-compliance

If Supplier is in breach of the terms and conditions of this Supplier Code of Conduct (e.g. evidence of child labour, or an employee of Supplier acting as an intermediary for child prostitution, or disregard of ecological legislation) Apollo is entitled to terminate any contract and cooperation with the Supplier with immediate effect and reserves its right to take any further legal action at its discretion.

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