



ETHICAL CODE EUROPA MUNDO VACACIONES

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1. PRESENTATION

Our code of ethics is presented with the aim of determining the principles and criteria that should govern the behavior and actions of each of the workers, female workers, managers and directors of Europamundo Vacaciones, (here in after as **EMV**) and inform all our interest groups, collaborators, employees, suppliers, customers, shareholders, administrations, public and private institutions and society in general about our performance in the economic, social and environmental areas, disclosing the most relevant aspects.

2. INTRODUCTION

The ethical code intends to make EMV employees aware of the relevance of ethical aspects in the company's life and present the capacity of this code for professional improvement and quality in the management of our company.

In addition, with the preparation of this code, we intend to reflect on our work in the field of social responsibility and to serve as a guide to allow us to monitor the degree of compliance with our objectives of continuous improvement, showing our evolution, but also our weaknesses in the economic, social and environmental aspects.

3. BENCHMARK OF UNIVERSAL INITIATIVES

The specific benchmark for Europamundo Vacaciones is the **World Code of Ethics for Tourism** approved in 1999 by the Assembly of the World Tourism Organization (WTO) of the United Nations, which affirms the right to tourism and the freedom of tourist movement, expressing the desire to promote a world order of equitable, responsible and sustainable tourism, for the mutual benefit of all sectors of society and in an environment of an open and liberated international economy, solemnly proclaiming to this end the 10 principles of the World Code of Ethics for the Tourism.

Since 2012, Europamundo Vacaciones has been a **member of the World Tourism Organization and is one of the 16 international partners of the ST-EP Program** of the World Tourism Organization, a program to reduce poverty through the implementation of responsible and sustainable tourism projects.

Furthermore, in 2012, **Europamundo Vacaciones joined the United Nations World Compact** or Global Compact and its ten principles on human rights, labor, environment and anti-corruption that enjoy universal consensus and are derived from: Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

Previously, in 2011, Europamundo Vacaciones was a **reference partner of Banco Ético Fiare**, a subsidiary of the Italian Banco Ético Banca Popolare.

Since June 2014, Europamundo Vacaciones has been a reference for the **JTB Group's code of conduct**, philosophy and commitments, and the **JTB Group's Environmental Declaration** as a benchmark.

Since November 2014, Europamundo Vacaciones has had a **Manual of Good Practices** that covers the ethical aspects of the organization's life and its direct and close relationship with interest groups, the environment and the organization's internal relations.

4. GENERAL PRINCIPLES

The general principles contained in this Code of Ethics define us as a company and must guide all our actions.

- Respect
- Transparency
- Professionalism
- Confidentiality
- Social Responsibility
- Dialogue and Interculturality

Respect.

EMV respects the local cultures, typical of each community and country in which it operates or countries of origin of passengers, adopting a committed attitude seeking to contribute to the socioeconomic development of these places and knowledge of their cultures.

EMV considers respect for people and their dignity as a fundamental value, fully subscribing to the declarations and agreements that are described in the performance criteria of action (point a).

EMV is committed to sustainability, while preserving the environment, adopting procedures to reduce the environmental impact of its activities.

Transparency.

Transparency is a fundamental principle for customers, shareholders, suppliers and society in general, creating a climate of trust in EMV's business activity.

EMV is committed to providing its customers with complete and accurate information for the performance of its activities, providing to shareholders with relevant financial and corporate information and hiring suppliers under a free competition regime.

Professionalism.

Excellence is one of EMV's core values, placing customer, supplier and employee satisfaction at the centre of our professional performance.

EMV's action with interest groups in general and with workers is one of honesty and professional responsibility, creating values for the environment in which it operates and its customers.

EMV values the ability and contribution of each employee and the values and principles that motivate them.

Confidentiality.

EMV has the obligation to protect the personal and private information of each of the interest groups, with special relevance for customers, employees, shareholders and suppliers.

The personal information requested must be adequate and relevant for the required purpose.

The information received should be safeguarded and only used for the purpose for which it was transmitted, respecting the rights of access, rectification, cancellation and opposition and all in accordance with the regulations in force in this matter and the internal regulations on treatment and confidentiality of personal data.

Social Responsibility.

In developing of our activity, we must take into account not only the economic benefit, but also the social and environmental ones.

EMV, through its Foundation, is a partner of the ST-EP program of the World Tourism Organization, acquiring a commitment to finance poverty reduction projects through sustainable and responsible tourism, promoting dialogue and interculturality.

Dialogue and interculturality.

For EMV, dialogue and sociocultural authenticity in the communities in which it operates and in the communities of origin of passengers is a basic principle, and therefore it will value in a very positive way all the experiences, activities and projects carried out by Europamundo Vacaciones and the Europamundo Foundation to bring the dialogue, their cultures, their customs, their uses closer to all interest groups and especially to all EMV staff, guides and direct workers, with the objective of creating a more tolerant, diverse and sustainable world.

5. ACTION CRITERIA

The code of conduct establishes the following performance criteria of action, in order to respond to expectations and establish the commitments that EMV has with each of the interest groups.

a) Respect for legality, human rights and ethical values.

Europamundo Vacaciones is committed to always acting in accordance with current legislations, international ethical standards and respect for human rights.

EMV's activities are carried out in accordance with the World Tourism Organization Code of Ethics, the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the Declaration of the International Labour Organization and the Declaration of the Rights of the Child of UNICEF and the United Nations Convention on the Rights of the Child.

All EMV employees and interest groups must comply with the actual legislations in the countries where they carry out their activity, with ethical behavior in their actions.

b) Respect for people.

People's rights are inviolable, therefore EMV rejects any action contrary to people's rights, such as physical, psychological or moral harassment, abuse of authority, intimidation and offense.

EMV guarantees a pleasant, healthy and safe work environment, promoting cordial relations between all employees, workers, and superiors.

All EMV staff are obligated to deal fairly and respectfully with all their co-workers, subordinates and superiors.

The relationships of interest groups and especially EMV workers and collaborating companies are based on professionalism, respect and mutual collaboration.

For EMV, personal development is of utmost importance and will facilitate the search for a balance between personal and professional life.

c) Equal opportunities and professional development.

EMV will seek the professional development of all its employees and equal opportunities without differentiation of gender, ethnicity, creed and sexual orientation.

The selection and promotion of EMV workers is based on clear, objective and transparent criteria.

EMV employees are informed of the vacancies available, for their internal coverage or usual means.

All employees will be able to actively participate in the training that EMV makes available to them annually, committing themselves to their use.

Managers and directors must exercise guardianship facilitating the professional development of their collaborators and employees.

d) Safety and health at work.

EMV adopts the necessary health, safety and prevention measures established in Spanish legislation.

EMV strives to apply the necessary occupational health and safety policies by the collaborating companies and suppliers with which it collaborates.

All EMV personnel must know the health and safety standards at work and ensure their own safety, that of their colleagues, customers, suppliers, employees and all those affected by their activities.

EMV will provide the necessary knowledge through training workshops and resources so that the company's activities are carried out in a healthy and safe environment.

e) Corporate image and reputation.

EMV considers that social responsibility is a differentiating and fundamental element that contributes to its corporate image and reputation and the perception of the company.

EMV considers corporate image and reputation to be one of the main components of the company and, at the same time, important to guarantee and reinforce the trust of stakeholders.

All workers must pay attention to the company's image and reputation in all their professional actions.

Likewise, they will ensure the correct and proper use of the image and reputation of the company and its employees, suppliers and service providers.

Workers must have proper authorization from the EMV and be especially careful in public interventions, media, conferences, seminars, and any other act in which they intervene and represent the company.

EMV will respect and not intervene in the political or religious processes of the countries and communities where it carries out its activities.

f) Loyalty to the company.

For EMV, loyalty is a relationship based on common interests.

EMV workers may not enter into unfair conflict or confrontation with their responsibilities at the company while conducting their own business or financial activities.

EMV personnel must inform the Human Resources department if they participate in other companies that conflict with EMV's interests.

All EMV members must, at all times, act with loyalty in the performance of their responsibilities, regardless of the degree or importance, avoiding situations that could generate conflicts of interest between personal and professional issues.

g) Customer relations.

Excellence and satisfaction are EMV's maxims, and its commitment is to promote the necessary policies so that all EMV members and interest groups take the necessary actions to achieve them.

All EMV components have established their relationships with clients on the basis of trust and mutual respect, seeking the highest levels of excellence in the provision of our services. It is a special consideration among all EMV staff, especially the guides and drivers who deal directly with passengers, their

adaptability, correct treatment and respect and knowledge of the different cultures.

In a relationship of trust, it is established that all information and advice that clients receive will always be adequate, in its broadest terms, making inadequate information or advice that may be misleading which would be contrary to the values and principles of EMV.

EMV and its workers must ensure compliance with the agreements in the provision of services to customers.

h) Relationships with collaborating companies and suppliers.

The collaborating companies and suppliers are an important and essential part of achieving the goals of improving excellence in the services provided by EMV. For this, relationships based on trust, collaboration, benefit and mutual learning will be established.

EMV is committed to social responsibility by requesting practices or performance criteria according to the interest groups included in this code of ethics.

All EMV members, when making proposals for the selection of suppliers or collaborating companies, must be guided by honesty, cost and quality, acting with objectivity and impartiality.

If suppliers and collaborating companies detect unfair treatment by any member of EMV or are not in accordance with the principles and values of this code of ethics, they can be referred confidentially, in good faith, to the Compliance Committee of the Code of Ethics without applying any type of sanction and retaliation.

All stakeholders and EMV itself must establish agreements to meet certain minimum standards of ethics, social and environmental responsibility.

i) Relations with shareholders.

We work diligently with our shareholders as they share our principles, values, criteria and EMV's business vision.

We seek the creation of added value in the daily work, a relationship of respect and mutual benefit.

EMV will ensure that there are no malpractices that go against the company's principles, performance criteria and Code of Ethics.

j) Commitment of Directors.

EMV directors must be a model of example, responsibility and objectivity for all members of their team and the company, especially when faced with moments or situations that require special attention.

They must carry out their professional practice in an ethical and responsible way, always maintaining an attitude of respect towards workers, not taking actions that are contrary to people's rights such as physical, psychological or moral harassment, abuse of authority, intimidation and offense.

They never give instructions contrary to the law, the EMV code of ethics, and its Manual of Good Practices, or internal regulations, being an example of the principles and criteria of action of the Code of Ethics, as well as the commitments assumed.

All EMV managers and directors must have an open path for dialogue, communication and easy access to the EMV team at all times.

EMV's managers and directors must certify that all their collaborators and employees are aware of the principles and performance criteria of this Code of Ethics.

k) Respect for the environment.

Environmental sustainability is essential in EMV's actions and for this there is a set of measures that aim to adapt business activity to the preservation of the environment.

All EMV personnel, regardless of the type of contract, hierarchical level or any other condition, must accept the measures of respect and sustainability, adopting behaviors and habits in accordance with the good environmental practices promoted by the company.

It is necessary and important that everyone at EMV minimizes the impact of the activity on environmental sustainability, using the facilities and work equipment efficiently and being aware of the impact on the environment, promoting energy savings.

l) Exploitation of minors.

EMV and EMV stakeholder groups must ensure the immediate elimination of illegal activities and/or activities that may endanger the safety, health and morals of children in accordance with article no. 3 of ILO Convention No. 182.

Dangerous work endangers the physical, mental or moral development of the child, either by its nature or by the conditions in which it is carried out.

Given the concern that exists about the continued practice of sex tourism and because children are especially vulnerable to it, EMV is committed to this cause and follows the principles enshrined in UNICEF, especially contained in the Convention on the Rights of the Child, in Optional Protocol against exploitation, pornography, sex tourism and other forms of sexual abuse with minors.

6. COMPLIANCE WITH THE ETHICAL CODE

1. All workers, managers and directors of Europamundo Vacaciones must know and accept the principles and criteria of operation of this Code of Ethics and ensure compliance with its requirements.

2. Europamundo Vacaciones will not apply or allow any type of sanction or retaliation for any complaint or information made in good faith in relation to violations of this Code of Ethics.

3. Internal communications about possible violations of the Code of Ethics or questions that may arise from its interpretation or application will be forwarded to the Compliance Committee of the Code of Ethics, created for this purpose, which will receive, study and resolve them, safeguarding the confidentiality of the sender.

The Compliance Committee for the Manual of Good Practices and Code of Ethics, hereinafter the CoC, will inform the Board of Directors or, if applicable, the General Management on its composition and functions.

The internal communication channel for eventual violations can **also be** done through the manager of the corresponding Department, and/or the Human Resources Department (rrhh@europamundo.com), and also the General Management directly via email (luisgarciacodron@hotmail.com) or its own channel that will be created for the purpose of the CoC or confidentially through the mailbox that will be enabled in one of the premises of the EMV office in Madrid or through the JTB complaints reception mechanism.

There will also be an external communication channel, through the CoC, for interested parties, to make complaints, possible violations, ask questions and, if applicable, make suggestions.

4. Europamundo Vacaciones, through its CoC and informing the General Management, will determine the procedure for monitoring and updating the Code of Ethics, as well as for its improvement or modification.

5. The CoC will include in its annual report to the Board of Directors or the General Management a reference to the value of monitoring and acceptance of the Manual during the financial year.

ATTACHMENTS:

This Code of Ethics includes through its links the landmark with the universal initiatives followed by Europamundo Vacaciones.

World Tourism Organization's Economic Code:

https://webunwto.s3.eu-west-1.amazonaws.com/imported_images/37802/gcetbrochureglobalcodeen.pdf

UNWTO ST-EP Program:

<https://www.unwto.org/archive/global/publication/unwto-st-ep-programme>

- **United Nations World Compact:**

<https://www.unglobalcompact.org/>

Manual of Good Practices of Europamundo Vacaciones:

https://www.europamundo.com/rsc_comite.aspx

- **JTB Group Code of Conduct:**

http://www.jtbcorp.jp/en/company/about_jtb/group_code/index.asp

JTB Group Environmental Statement:

<https://www.jtbgmt.com/en/howeare/csr/>