

## Supplier Code of Conduct Policy

### Introduction

arrangeMY is committed to promoting a positive work environment and maintaining the highest levels of ethics and integrity, and requires its suppliers and providers (jointly “Suppliers”) to be committed to these same principles. Our goals are

to operate a sustainable, ethical and fair business and to ensure that those we work with do the same. Maintaining integrity in dealings with employees, customers, business partners, shareholders and the public is an indispensable part of the arrangeMY culture and is essential to provide fair, reliable and innovative services.

This Supplier Code of Conduct sets out arrangeMY’s minimum standards to which it expects Suppliers to adhere. By becoming or continuing to be a Supplier of arrangeMY, suppliers commit to comply with the Code of Conduct and arrangeMY trusts suppliers to do so and to notify arrangeMY if there is any breach, failure or inability to do so. Risk that non-compliance will lead to termination of the contract.

We expect our suppliers to comply with all laws, regulations and industry standards applicable to them as well as the requirements of this Supplier Code of Conduct, and to ensure that their subcontractors do the same. Suppliers are expected to educate their staff and other representatives to ensure they meet these expectations and promote the requirements of this Code of Conduct.

Suppliers are expected to comply with both the vision and the letter of this Code. In case of any uncertainty or immediately upon becoming aware of any matter that may contravene the requirements of this Code, Suppliers shall contact:

**suppliers@arrangeMY.com.**

Suppliers will cooperate and comply with any information requests or audits of their compliance with this Code of Conduct. Suppliers acknowledge that arrangeMY may immediately terminate any contract or relationship with Suppliers who fail to cooperate and/or breach this Code of Conduct. Compliance is mandatory. The code of conduct applies to subcontractors. Periodically, arrangeMY will request supplier audit participation to be required.

### 2. Human rights and child protection

It is fundamental to arrangeMY’s continued success and the sustainability of the communities where we do business to ensure people are treated with dignity and respect. To that end, we will work only with suppliers who respect human rights, diversity and equal opportunity in the workplace.

Suppliers shall:

Document	Version	Date	Authorised	Status
QP48	1.0	15/04/2026	S Holtom	Released

a) Treat workers with respect and dignity. All forms of offensive behaviour, including insulting, violent, abusive, demeaning, harassing or bullying conduct towards workers, is prohibited.

b) Prohibit any threats, bullying or unlawful harassment of any type, including emotional, physical or sexual harassment of their employees and others with whom they interact.

c) Respect the diversity of the workforce and seek an environment where all individuals have equal opportunities and are treated with respect and dignity regardless of race, religion, gender, age, nationality, disability, personal relationship, union membership, sexual orientation, political opinion or any other personal characteristics. Employment shall be based upon individual merit and qualifications directly related to professional competence.

d) Prohibit the use of child labour. Employees shall not be under the age of 16 or any higher legal minimum working age of the respective region. arrangeMY supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people and will not do business with those who abuse such systems.

e) Ensure that children are protected from tourism-related sexual or other exploitation and abuse and shall without exception report any incidents or suspicions to the local authorities.

### **3. Working conditions**

To provide and promote fair working conditions, wages and benefits are one of the most important things to arrangeMY. Consequently, we expect Suppliers to employ and pay according to arrangeMY's standards.

#### **Suppliers shall:**

a) Pay living wages under humane conditions. All workers shall be provided with clear, written information about their employment conditions concerning wages before they enter employment and as needed throughout their term of employment. Wages and benefits paid for a standard working week must, at a minimum, meet national legal standards.

b) Not to apply deductions from wages unless allowed by national law and only to the extent allowed by law. In other cases, wage deductions shall only be permitted with the express permission of the worker concerned.

c) Use only voluntary labour and all workers must be free to leave upon reasonable notice. The use of (or in any way benefiting from) forced, prison, bonded or involuntary labour by a Supplier and/or its subcontractors is prohibited, and Suppliers must promptly inform the appropriate authorities where they reasonably suspect that any individuals associated with their businesses are at risk of human trafficking or similar exploitation,

d) Not require workers to work more than the maximum hours of daily labour set by

Document	Version	Date	Authorised	Status
QP48	1.0	15/04/2026	S Holtom	Released

local laws.

e) Provide as a minimum all legally mandated benefits, holiday (annual leave) time, maternity/paternity and other leave periods.

#### **4. Health and safety**

arrangeMY will only work with Suppliers who provide a safe and healthy working environment for all their employees.

##### **Suppliers shall:**

a) Fully comply with all applicable health and safety laws, regulations and practices and will provide a safe and healthy working environment for all employees. Emergency response procedures will be established and maintained.

b) Ensure that sufficiently high standards of hygiene and sanitation are maintained on their premises, implement work safety guidelines and procedures and educate their employees to reduce and prevent accidents and occupational illness and not discipline employees for raising safety concerns; and

c) Ensure insurance coverage and medical attention is provided to employees in case they suffer an accident or incident while working.

#### **5. Responsible business and ethical behaviour**

Suppliers are expected to conduct business transparently and ethically and shall not participate directly or indirectly in any illegal, corrupt or improper business practices. Suppliers shall:

a) Accurately and fully disclose to arrangeMY any requested or relevant information regarding their business activities, structure, financial situation and performance on arrangeMY's behalf, which may affect the performance of their contract with arrangeMY, in accordance with applicable laws, regulations and industry practices.

b) Comply with the anti-corruption laws of the countries in which they do business and with the UN Global Compact, and the United Kingdom Bribery Act.

c) Not offer, promise or pay, or request, receive or accept any bribes or other undue or improper advantages to or from anyone for any reason, whether in dealings with governments or the private sector.

d) Not engage in corruption, extortion, anti-competitive practices or fraud in any form.

e) Be direct and truthful in discussions with regulatory agency representatives and government officials and in all business dealings.

f) Immediately notify arrangeMY if any arrangeMY employee solicits any gift, benefit or favour regardless of value.

g) Notify and seek permission from arrangeMY in writing prior to offering any gifts or hospitality to any arrangeMY employees of more than minimal value.

Document	Version	Date	Authorised	Status
QP48	1.0	15/04/2026	S Holtom	Released

h) Ensure that any such gifts or hospitality are not intended to and cannot reasonably be perceived to be an attempt to secure improper favourable treatment.

i) Be upfront and disclose any conflicts of interest with arrangeMY including arrangeMY employees.

j) Comply at all times with all sanctions, export control, and anti-boycott laws, regulations, orders, directives, designations, licenses, and decisions of the European Union, the United Kingdom, the United States of America, and of any other country with jurisdiction over activities undertaken in connection with their engagement with arrangeMY.

k) Fully comply with any applicable money laundering regulations, prohibit money laundering and actively pursue its prevention.

l) Not do or omit to do any act or thing which may cause arrangeMY to commit a bribery, corruption, money laundering, anti-trust or fraud offence.

## **6. Privacy, data protection and information security**

Protecting and safeguarding the privacy and the information arrangeMY has been trusted with, is one of our most important matters.

Suppliers shall:

a) Respect the privacy of their candidates, employees, customers, suppliers, shareholders and other stakeholders.

b) Comply with all applicable data protection laws (including the EU Regulation 79/2016, commonly known as GDPR) and train employees in this respect.

c) Implement appropriate security measures to protect the privacy and personal data

d) Fully comply with any data processing agreement or terms entered by the parties.

## **7. Confidential Information**

Suppliers shall respect and keep confidential (and cause their employees and suppliers also to respect and keep confidential) any confidential information disclosed by arrangeMY during their commercial relationships. Such obligations will remain unaltered even after the termination of the commercial relationship.

## **8. Environmental Sustainability, Governance and Corporate Responsibility**

As a leader in the travel industry, sustainable business travel is an important focus for arrangeMY and its customers. We strive to operate sustainably, in order to minimise the environmental impact of our activities.

**Suppliers shall, without limitation:**

a) Fulfil all environmental requirements defined in relevant laws and regulations and environmental permits.

Document	Version	Date	Authorised	Status
QP48	1.0	15/04/2026	S Holtom	Released

b) Seek to make continuous improvements to the environmental performance of its operations and products.

c) Contribute to the sustainability of the communities in which they operate, with progress assessments on community issues in line with industry standards.

d) Reduce energy (in particular CO<sub>2</sub> emissions), waste and water consumption.

e) Implement purchasing policies and procedures which favour sustainable and locally produced goods and services in preference to imported products wherever possible and reasonable to do so.

f) Monitor, control, treat and endeavour to reduce or eliminate solid waste, wastewater, environmentally damaging chemicals, and air emissions as required by applicable laws and regulations, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities procedures; and recycling, reusing, or substituting materials.

## 9. Tax

We believe that taxes are part of a well-ordered society. To that end, we expect our Suppliers to ensure and procure that they, their officers, employees, agents, sub-contractors and any other persons who perform services for or on their behalf will:

a) Comply with all applicable tax legislation and meet legal requirements, including timely filing of tax returns and tax payments.

b) Maintain an open, transparent dialogue and a good working relationship with tax authorities both proactively and reactively.

c) Carefully monitor and analyse any risks to achieve the greatest possible level of transparency to ensure the right decisions are made in time to protect the business from any significant financial impact; and

d) Not do or omit to do any act or thing which may cause arrangeMY to commit a tax offence.

## 10. Implementation and controls

a. Provide systems and channels for employees or others to be able to report (also anonymously) any concerns or grievances connected with laws and regulations applicable to the Supplier and with this Code and do not discipline employees or any other party for raising such concerns.

b. Ensure that it has in place adequate policies and procedures to ensure compliance with all applicable laws, regulations and this Code and to minimise the risk of breach.

c. arrangeMY will conduct their own Supplier Sustainability Risk Management Reviews in ensure they are achieving best in market service and performance standards, plus strong alignment with applicable laws and regulations.

Document	Version	Date	Authorised	Status
QP48	1.0	15/04/2026	S Holtom	Released

## 11. Amendments

This Supplier Code of Conduct will be reviewed on an annual basis; each version will be shared with the appropriate suppliers to review and accept.

## 12. Termination

arrangeMY expects all Suppliers to comply with this Code of Conduct. Where a breach is identified, Suppliers must promptly take appropriate corrective action within a reasonable timeframe agreed with arrangeMY.

Where a Supplier fails to demonstrate sufficient progress, refuses to cooperate, or where a breach is deemed severe (including but not limited to human rights violations, bribery, corruption, or serious environmental harm), arrangeMY reserves the right to suspend or terminate the relationship.

In cases of serious breaches, failure to cooperate, or where corrective action is not implemented effectively, arrangeMY reserves the right to suspend or terminate the business relationship, in line with contractual terms.

arrangeMY may also require evidence of remediation and reserves the right to conduct follow-up assessments to ensure compliance has been restored.

## 14. Risk Management Scoring Matrix and Evaluation of Risk

arrangeMY will review risks continuously for events such as Supplier Failure Risk, Duty of Care, Traveller Safety, Regulatory and Compliance Risks, Data Security and Cyber Risk, Marketing Volatility, Operational Disruption, Reputational Risk, ESG Risk, Geopolitical Risk and Financial Risk

Sustainability Risk Management Matrix - arrangeMY Suppliers					
Impact/Likelihood	1 - Rare	2 - Unlikely	3 - Possible	4 - Likely	5 - Almost Certain
<b>5 - Severe</b>	Medium ▾	Medium ▾	High ▾	Very High ▾	Critical ▾
<b>4 - Major</b>	Medium ▾	Medium ▾	High ▾	High ▾	Very High ▾
<b>3 - Moderate</b>	Low ▾	Medium ▾	Medium ▾	High ▾	High ▾
<b>2 - Minor</b>	Low ▾	Low ▾	Medium ▾	Medium ▾	High ▾
<b>1 - Insignificant</b>	Low ▾	Low ▾	Low ▾	Medium ▾	Medium ▾

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Score	Rating	Action Required
1-5	Low	Monitor
6-10	Medium	Mitigate if cost effective
11-15	High	Active management required
16-25	Critical	Immediate action & escalation

**This policy will be reviewed every 12 months from April 2026**



Signed:

Dated: 15/04/2026

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