

# Code of Ethics and Conduct for Business Partners

We have always applied the highest standards to our products and services in order to meet our customers' expectations. In everything we do in business, we place the highest value on ethical and sustainable operations.

## 1. Values

Condor Flugdienst GmbH and its affiliates ("Condor" or "We") are committed to ethical and sustainable operations that fulfill our commitments to our customers and protect their interests. For this reason, we intend to work only with suppliers, consultants, agents or other business partners ("business partners") who meet the same requirements and represent industry best practices.

This Code of Ethics and Business Conduct for Business Partners ("Code") sets out binding minimum standards for business conduct that we also expect from our business partners. Not just Condor, but also our business partners, must have processes in place to monitor and comply with these standards including within their supply chain. Such processes include also informing respectively training employees and own suppliers and obtaining the agreement to the standards set out in this Code by these suppliers.

## 2. Business Integrity

Condor strives to act at all times in accordance with applicable legal requirements. We condemn activities that violate applicable law, for example in the areas of corruption, protection of confidential information and personal data, fair competition, employee and human rights, and protection of the environment.

Accordingly, our business partners are required to comply with legal provisions in all countries in which they operate. Business partners are not allowed to behave in a way that could discredit Condor or lead to Condor being directly or indirectly involved in or associated with illegal or dubious practices.

## 3. Fighting Bribery and Corruption

We are convinced that successful business is based on factual decisions. Decisions should not be influenced by emotional motivations such as gratitude, goodwill or the feeling of owing someone something.

Accordingly, our business partners are also committed to:

- comply with all applicable laws, rules, regulations, and codes relating to bribery and corruption, including the United Nations ("UN") Convention Against Corruption, and not engage in any form of bribery or corruption in any aspect of its business or external relationships;
- to adhere to the highest standards of ethical conduct, to respect locally applicable laws, and not to engage in any form of corrupt practices, including extortion, fraud or other misconduct;
- promptly report to Condor any inquiries or claims regarding improper financial or other benefits of any kind made to them in connection with the provision of services to Condor; and
- not to grant any employee of Condor any improper advantages or opportunities to facilitate business cooperation with Condor. Condor does not accept any inappropriate gifts or invitations.

#### **4. Conflicts of Interest**

We avoid business decisions that are based on or influenced by conflicts of interest. Members of our company are required to act in the best interests of the company at all times and to put aside their own conflicting interests. Accordingly, our business partners are also bound to transparency and must disclose to Condor all cases that could be considered a conflict of interest, such as those arising from business activities of Condor employees or from economic relationships of the business partner.

#### **5. Protection of Confidential Information and Personal Data**

Condor is convinced that successful business relationships are based on mutual trust. Therefore, we treat information received from business partners as confidential and do not disclose it to third parties unless required or permitted by law. We ensure that these obligations continue when members of our company leave. We process personal data in accordance with European and applicable national data protection law. Where we involve third parties in the processing of personal data, we ensure that these third parties provide an equivalent standard of confidentiality and data protection.

We also require this from our business partners. Therefore, our business partners are prohibited, among other things, from disclosing Condor's confidential data to third parties without Condor's prior consent (including press releases or other statements to other media about Condor or the activity the business partner performs for Condor).

#### **6. Fair Competition**

Condor conducts its business in compliance with antitrust regulations and all other competition law provisions of the European Union and other applicable legal systems. We are convinced that fair competition is a cornerstone of our economic order and serves the common good. We face up to competition and strictly reject illegal agreements with competitors or suppliers.

We demand the same from our business partners at all times.

## **7. Occupational Safety, Employee and Human Rights**

Condor respects open communication between employees and management without intimidation or fear, retaliation, threat or punishment.

Providing our employees with a safe and healthy workplace in compliance with the standards of the International Labor Organization (ILO) and the UN Guiding Principles for Responsible Business is our highest priority. We make great efforts to continuously improve working conditions in order to prevent accidents and occupational diseases.

Employees receive appropriate salary in accordance with relevant industry standards or the applicable statutory minimum wage. Regular working hours are in accordance with applicable laws or collective bargaining agreements.

Freedom from harassment, equal opportunities and equal treatment with regard to employment and occupation are of great importance to us. Fair treatment and equal opportunities must be guaranteed without discrimination on the basis of ethnicity, skin color, gender, religion, political views, ancestry, social origin or other discriminatory grounds.

All rights of employees with respect to the exercise of their legal rights of free association are recognized and respected, including joining or not joining an association of their choice.

Employment with Condor is freely chosen and does not involve coercion, threat or duress. Employees are also free to terminate their employment without hindrance in accordance with applicable law. Any form of modern slavery is strictly rejected. The same applies to torture and unlawful land confiscation.

We comply with the laws on the protection of children, including the UN Convention on the Rights of the Child and ILO Conventions 138 and 182. This includes regulations regarding the minimum age of employees as well as all legal provisions regarding the permissible work of juvenile employees, in particular regarding working hours, remuneration and safe working conditions. We also condemn any form of sexual exploitation of children.

Condor promotes the protection of human rights and does not support business with individuals, companies or organizations that violate the standards and foundations of principled human rights or maintain relationships with an oppressive system that give cause for concern.

In accordance with these requirements, our business partners are also required and obligated by this Code to comply with the aforementioned standards on occupational safety, employee rights and human rights for their part and to implement the same in their supply chain.

## **8. Environment and Society**

Environmental protection not only benefits the general public but is also in our business interests. We comply with all applicable laws on the protection of the environment, sustainability and climate protection to safeguard the future of coming generations. We take great care to prevent violations of environmental regulations, including harmful soil

contamination, water pollution, or non-environmentally sound handling, collection, storage, and disposal of hazardous waste, and to be neither directly nor indirectly involved in such violations.

We expect our business partners to also take all reasonable measures to reduce the environmental impact of their operations and the products they produce. Business partners should review and reduce the use of raw materials and the consumption of energy and water. Business partners are also encouraged to promote social and economic development in the communities in which they operate by investing in the development of employees and the local supply chain.

## 9. Other Business Principles

- **Honesty** is highly valued by Condor and business partners are prohibited from knowingly making false, misleading or inaccurate statements, withholding or destroying relevant facts. All relevant findings must be reported immediately so that Condor can take necessary action.
- Business partners are required to provide **complete and proper accounting** for all approved work and **in no case to request or accept payment in cash or in kind**.

## 10. Submit Complaints

Compliance with this Code of Ethics and Conduct is not a one-time task, but a constant challenge for our management, executives and employees as well as for our business partners. Therefore, we expect not only members of our company to always observe the requirements of this Code, but also our business partners.

In this context, we expressly encourage you to report possible violations of the laws and principles of this Code to us, unless reporting obligations already exist (see, for example, 3., bulletpoint 3).

As a matter of principle, we treat such reports professionally, fairly and confidentially within the framework of the legal provisions. Reports can be submitted anonymously or by name.

Whistleblowers have the choice between the following different ways to report incidents:

### 10.1 Electronic Reporting System Condor SafeSpace

Under the link: <https://safespace.condor.com/>, our web-based whistleblower system, it is possible to submit reports on various topics, such as allegations of corruption or human rights or environmental issues. It is possible to get in touch with a contact person and submit reports via a secure system - either anonymously or by name. The system can be accessed from any internet connection and is available in German and English. Further details will be provided during the whistleblowing process.

## **10.2 Alternative Complaint Channels**

Alternatively, complaints may be submitted as follows:

### **10.2.1 E-Mail**

codeofconduct@condor.com

### **10.2.2 Phone**

The following telephone number is available during business hours: +49 151 58945446

### **10.2.3 Mail**

By mail to the Legal Department or Human Rights Officer as follows:

Condor Flugdienst GmbH  
Legal Department or Human Rights Officer  
Private and confidential, do not open  
An der Gehespitz 50  
63263 Neu-Isenburg  
Germany

## **10.3 Processing Complaints**

Reports to the above-mentioned channels will be forwarded to the person entrusted by Condor with the implementation of the procedure and documented by him/her. The persons entrusted guarantee impartial action and are bound to secrecy within the framework of the legal provisions.

If the whistleblower has provided a means of contact, receipt of the report will be confirmed to the whistleblower within seven days. The person in charge of the procedure then checks the relevance and validity of the report, requests further information from the whistleblower if necessary and maintains contact with the whistleblower. If necessary after clarification of the facts, Condor will take appropriate remedial action regarding the incident. The person entrusted with the implementation of the procedure will provide the whistleblower with feedback on the matter within a reasonable period of time not exceeding three months.

Reports shall be treated confidentially within the framework of the legal provisions. In addition to the persons entrusted with the procedure, Condor may, if necessary, involve other functions within or outside the company (e.g. departments for internal advice on specific topics, business partners for information, lawyers for legal advice).

Whistleblowers acting in good faith are protected from disadvantage or punishment within the framework of the legal provisions.

## **11. Monitoring and Consequences of Misconduct**

Condor reserves the right to monitor and verify compliance with legal provisions and this Code, for example through audits conducted by itself or by third parties. We expect our business partners to cooperate fully in this regard.

For any deviation from legal provisions or the Code that is identified or becomes known, the business partner must prepare a corrective action plan to be approved by Condor. In the event of misconduct by the business partner, Condor reserves the right to terminate any contracts, agreements, purchase orders or other legal relationships with the business partner without notice, without Condor assuming any liability, financial or otherwise, as a result of such termination.

## **12. Contact**

If you have any further questions, please contact the Human Rights Officer in accordance with Section 10.2.

Dated: 14.12.2022

Condor Flugdienst GmbH  
An der Gehespitz 50  
63263 Neu-Isenburg