

Code of Conduct

Business Partners

This Code of Conduct defines the basic requirements Aroundtown SA and its subsidiaries and affiliates (hereinafter the “Company” and/or “Group”) set for its business partnerships. The Company agreed on binding standards and the expectation on a day-to day behavior to achieve an ethical business conduct within its Group, its employees and other personnel to expressly distance from corrupt behaviors and unethical business. Such principles shall be explicitly acknowledged by its business partners too. The Company’s business partners shall demonstrate the same level of commitment, which forms the atmosphere of highest ethical standards. As an international company with international business partners various legislations, laws and regulations shall apply to our business, we expect our Business Partners to comply with the laws of different countries and to act with integrity.

The Company’s business partners declare therefore:

- **Prohibition of corruption and bribery**
 - To refuse any form of corruption and bribery as well as not to offer or promise such. The prohibition must extend to corrupt acts and to facilitation payments. As well as to refrain from promising or presenting gifts or other benefits to the Company’s employees or other personnel.
 - To avoid any influence to the Company’s employees and personnel’s or third parties working directly or indirectly for the Company by awarding any contract.
 - By restricting the invoicing in accordance with the services done in fact.
- **Legal compliance**
 - To comply with the laws of the applicable legislations.
- **Inside Information**
 - Not to disclose any inside information about the Company and/or its subsidiaries and/or affiliates to anyone, including, but not limited to, the Business partner family, friends, business associates or affiliates, until such information has been approved for release by the Company and is released to the general public. The Business partner acknowledges that some or all of the Insider Information is or may be price-sensitive information and that the use of such information may be regulated or prohibited by applicable legislation including securities law relating to insider dealing and market abuse. The Business Partner undertakes not to use any Insider Information for any unlawful purpose and in particular not to use such information to buy or sell shares of the Company either directly or indirectly through any person, until such

information has been approved for release by the Company to the Public.

- **Intellectual Property**

- To protect the intellectual property of the Company. Intellectual property includes copyrights, patents, utility models, trademarks such as a company logo, trade secrets, know-how and other non-typified industrial property rights. You are not allowed to use the Company IP outside of the services rendered to the company.

- **Conflict of interest**

- To avoid all conflict of interest that may have the least adverse effect on the business relationships.

- **Health and Safety of Employees**

- To take responsibly for employee's health and safety to ensure acceptable living conditions and to take best reasonable precaution measures against accidents.

- **Environmental protection**

- To act in accordance with applicable statutory and international standards regarding environmental protection.

- **Disciplinary Practices**

- To ensure that physical punishment, threats of violence or other forms of mental or physical coercion or abuse must not be used. Monetary fines or deduction in compensation as a means of disciplinary measure is not allowed.

- **Money laundering**

- To ensure that applicable money laundering provisions are not breached.

- **Business information**

- To publish and report business activities truthfully and in line with the laws in force.

- **Protection of Personal Information of Employees**

- To safeguard and treat confidentially all personal information of employees disclosed to your company.

- **Competition/Anti-trust laws**

- To act in accordance with applicable competition laws. Especially not to participate in price-fixings, bid-rigging, market/customer-sharing.

- **Respect for basic human rights of employees**

- To support and respect the protection of internationally proclaimed human rights and to ensure not to be complicit in human rights abuses.
- To refrain from child labour and not to employ only if country's legal age for employment is reached.
- To ensure that all labour is given freely and that forced and compulsory labour is prohibited. Employees are free to leave work or terminate their employment with reasonable notice or in accordance with established legal requirements.
- To provide a workplace with equal opportunities and free of harassment

and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, genetic information, religion, political affiliation, membership or marital status is not to tolerate.

- To respect personal privacy, data protection and right of each individual.
- To provide fair remuneration in wages in accordance with the local and national applicable wage statutes, whether or not they are enforced. Seeking to understand the minimum wage requirement for basic needs to be met in the area of operation and seeking to ensure workers are provided with remuneration at or above such amount. Paying full-time employees regularly and at intervals not exceeding one month. Providing employees with a wage statement including information on the pay period concerned, the gross amount of wages earned, any deduction which may have been made and the reasons therefore, and the net amount of wages due. Not making deductions from wages as a disciplinary measure if those wages have already been earned. For non-salaried employees, keep accurate written records on each employee's

hours of work, overtime work and wages paid. Not charging workers exploitative prices for company-provided, necessary goods and services when they have limited access to other providers.

- To comply with the applicable regulation of maximum working time.
- To respect and recognise employees' rights pertaining to freedom of association and the exercise of collective bargaining. If the rights to freedom of association and collective bargaining are restricted in the respective country then the supplier should authorize employees to elect a representative to protect their rights in the workplace.

- **Confidential Information and Trade Secrets**

- Not to disclose confidential information and trade secrets of the Company and ensure that these are not made accessible to unauthorised persons within or outside of the Company. You must return to the Company all information and documents you have received during your service period to the company. All such information belongs to the Company.

Legal Consequences of violation the Code of Conduct for the Company's Business Partnerships

If the Company's business partner does not observe the above manifested principles, the Company is entitled to immediate terminate the business relationship with this business partner for cause. If a

business partner contravene the Code of Conduct for the Company's Business Partnerships, the Company reserve the right to exclude permanently said business partner from awarding of contracts.

The business partner is obliged to instruct its employees and personnel's involved with a business relation to the Company about the set principles in business relation.

Aroundtown SA

Hereby we explicitly acknowledge the code of conduct:

Place, Date

Legally binding signatures

Company stamp

Aroundtown SA

1, Avenue du Bois + L 1251 Luxembourg

T +352 28 57 741 + F +352 28 57 74 28+ info@aroundtownholdings.com + www.aroundtownholdings.com

Board of Directors: Frank Roseen + Oschrie Massatschi + Jelena Afxentiou + Markus Leiningner + Markus Kreuter + Dr. Axel Froese

R.C.S. Luxembourg + B217868