

Code of Conduct 2023

Avolta AG, together with the Avolta Group companies (collectively, “Avolta”), is a leading global travel experience player with more than 5,100 travel retail and travel F&B outlets in 73 countries on six continents. As such, Avolta is committed to conducting its operations in an ethical and legal manner in compliance with

accepted business standards and applicable laws and regulations with respect to anti-corruption, human rights, worker health & safety, the environment, and product safety.

 **Avolta**

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Code of Conduct

Avolta requires all of its directors, employees and officers (together, “Employees”) to adhere to the following principles in their interactions with colleagues, customers, business partners and other stakeholders.

1. Compliance with laws, rules and regulations and internationally-accepted human rights standards

We act ethically and in compliance with all applicable laws at all times.

Avolta requires its Employees to behave at all times with honesty, ethics and within the confines of the law. Avolta does not tolerate dishonesty or unlawfulness on the part of its Employees and seeks to interact with its customers and business partners with integrity and fair dealing.

Avolta is also committed to the Ten Principles of the United Nations Global Compact, and in particular to respecting the Universal Declaration of Human Rights adopted by the United Nations General Assembly in 1948 and the International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work adopted in 1998.

Avolta provides regular trainings to facilitate lawful and ethical behaviour in line with the principles set out in this Code of Conduct and its internal rules and policies.

2. No bribery, corruption or facilitation payments

We prohibit bribery and corruption at all times and in any form, whether direct or indirect.

Avolta does not tolerate bribery or corruption. It requires all Employees and third parties working with Avolta to comply with all applicable laws against active and passive bribery and corruption.

Bribery is the offering, promising, giving or accepting of any illegal, pecuniary or other advantage to or by:

- a public official at a local, national or international level;
- a political party, party official or candidate; and
- a director, officer, employee or agent of a private enterprise, in order to obtain or retain a business or other illegal advantage.

Employees should also not make any facilitation or convenience payments, to facilitate routine administrative or clerical tasks, except where: (i) all other reasonable possibilities have been exhausted, (ii) the amount of the facilitation payment is minimal, and (iii) the facilitation payment is documented and accounted for by Avolta.

New Employees are provided with a copy of the Code of Conduct when they join Avolta and are required to acknowledge acceptance of its terms in writing. Ongoing compliance training is provided to Employees as applicable on a periodic basis with respect to the Code of Conduct and related policies.

3. Gifts, hospitality and entertainment expenses and donations

We conduct our business in a fair and ethical manner.

Avolta requires its Employees to adhere to the following rules on when gifts, hospitality or entertainment expenses (“Gifts”) may be made or received to ensure that no Gifts are given or accepted with a view to illegally influencing the receiving person’s decision:

- Gifts should never be offered in secret and should never exceed the recipient’s ability to repay;
- Money should never be offered as a Gift;
- Voyages and business trips must have a legitimate business purpose; and
- Gifts should never be offered when bidding for a contract or at any stage of a concession tender.

Employees must properly and fairly record all financial transactions in the appropriate books of accounts available for inspection by the audit committee of the Board of Directors, as well as by the auditors.

In addition, Avolta requires strict adherence to applicable laws and disclosure requirements in relation to political and charitable contributions and sponsorships (together, “Donations”). A Donation should be avoided where it would create the impression that it is made in exchange for a business advantage for Avolta.

4. Conflicts of interest

We seek to avoid conflicts of interests.

A conflict of interest arises when an Employee’s personal or private interest interferes with his or her ability to act in the best interests of Avolta. We require that Employees avoid situations that create – or even appear to create – a conflict of interest with Avolta that could harm Avolta’s reputation.

5. Insider Trading

We comply with insider trading rules when dealing with Avolta AG Securities.

Avolta prohibits all its Board members and Employees to enter into any transactions in Avolta AG securities on the basis of potentially share price sensitive information which is not yet public, or other confidential information. In addition, Avolta’s Board members and officers,

as well as any other Employees that may have access to price sensitive information, are prohibited from making any transactions in Avolta AG securities during defined Quiet Periods before the public announcement of Avolta AG's financial results or any other price sensitive information.

6. Data Privacy and Protection

Avolta requires its employees to comply with Avolta's group data protection policy and applicable data protection laws.

We are firmly committed to safeguarding the privacy of our Employees, customers, business partners and other individuals whose personal information Avolta may have access to in line with all applicable laws.

We take care to:

- treat all personal information (i.e. information relating to identified or identifiable individuals, including full names, mailing, e-mail and IP addresses, government-issued ID card copies or identification numbers, credit card information, pictures and videos (CCTV), health data, and salary and bank account information, as well as personal information about an individual's race, ethnicity, gender, age, sexual orientation, religion, medical condition or other similar information) as confidential;
- securely store such personal data to prevent unauthorized access; and
- only collect, use and otherwise process it for legitimate business purposes and in accordance with applicable laws, including the EU General Data Protection Regulation.

Anyone wishing to access, delete, correct, or transfer his or her personal information should address such requests ("Subject Data Requests") to privacy@dufry.com

7. Equal employment and non-discrimination

We foster a culture of equal opportunity and diversity.

Avolta considers diversity and non-discrimination to be the foundation of its corporate culture. It commits to providing every Employee with an equal opportunity workplace that offers career opportunities without regard to an Employee's race, colour, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, political orientation, or disability. All forms of such discrimination violate the Code of Conduct and core values and will not be tolerated. Suspected discrimination should be reported in one of the ways set out in section 11 below.

We also commit to providing our Employees with fair and competitive wages based on an individual's background and experience, the particular job within our organization, the appropriate market benchmark in the respective countries and locations as well as her or his performance

8. No Harassment

We apply a zero tolerance policy for harassment and are committed to providing a work environment that promotes dignity and respect.

Avolta is committed to implementing and promoting measures to protect the dignity of its Employees, to encourage their well-being, and to encourage respect in the workplace. As such, Avolta applies a zero tolerance policy for harassment and bullying. Employees that experience harassment should report it promptly in one of the ways set out in section 11 below.

9. Supplier Code of Conduct

Pursuant to Avolta's Supplier Code of Conduct – which is based on the Universal Declaration of Human Rights, the fundamental ILO Conventions and the Rio Declaration on Environment and Development – none of the products or services sold to Avolta by any supplier should be supplied, manufactured, assembled or packaged using child labour, forced or bonded labour of any type, unsafe or unhealthy working conditions, discriminatory practices or restraints on the freedom of association and collective bargaining in contravention of applicable legislation.

Avolta sends a copy of the Supplier Code of Conduct to its suppliers and requests that they confirm acceptance of its terms and communicate the obligations in it to their employees, agents, subcontractors, and suppliers.

10. Business partners

We carry out due diligence on our business partners

Avolta seeks to work with reputable business partners who are committed to the same ethical standards as Avolta and comply with applicable law and accepted business standards. A risk-based approach is used to evaluate a prospective business partner based on reputation, corporate documentation and geographic location, among other things.

11. Reporting non-compliant conduct

Any suspected wrongdoing or violations of our policies can be reported at any time by anyone (even anonymously):

- by email at compliance@avolta.net;
- by phone on Avolta's Global Hotline Numbers (see Annex 1); or
- through our web-based reporting platform at www.avolta-ethicspoint.com

Employees also have the option to follow the hierarchical reporting line as set out in the Avolta's internal policies.

Avolta applies a zero tolerance policy for retaliation against Employees who report violations of Avolta's policies, this Code of Conduct, or other wrongdoing in good faith.

Annex 1

Avolta's Country-Specific Toll Free Hotline Numbers:

Country	Toll free number
Argentina	0800-345-2606
Australia	1800-517-424
Belgium	0-800-100-10
Brazil	0800-762-0090
China	400-120-0436
Denmark	80-83-00-74
Finland	0800-413609
France	0800-90-29-52
Germany	0800-181-9691
Greece	80-06000615
India	000-800-0502-035
Indonesia	007-803-321-2337
Ireland	1800-903-376
Italy (includes San Marino, Vatican City)	800819540
Malaysia	1-800-81-2893
Maldives	5035307000
Mexico	8008801738
Netherlands	8000200162
New Zealand	0800-527-513
North America F&B	1-888-773-2511
North America Retail	+1 (877) 866-7852
Norway	800-62-328
Slovenia	080-083162
Spain	900751410
Sweden	020-88 85 76
Switzerland	0-800-890011
Turkey	0811-288-0001
United Arab Emirates	800-035704527
United Kingdom	0800 088 5394

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