

“WE TAKE RESPONSIBILITY FOR YOUR TRAVEL SERIOUSLY.

TRAVEL IS A MATTER OF TRUST.”



Thomas Kreillechner
Managing Director

**DEAR SIR OR MADAM,
DEAR EMPLOYEES,**

Customers of BTU Business Travel Unlimited need not only be able to rely on the fact that:

the travel activities and all related services important for you and your company are in reliable and reputable hands,

- they are given a special customer orientation, and
- they can expect a high quality of service and tailor-made products that suit their individual environment.

Customers must also be able to rely on the fact that:

- our principles and values are respected, and
- laws are not only complied with, but
- the employees are also committed to particularly high standards of conduct and always provide their customers with the maximum possible commitment without restriction.

A basic moral attitude, seriousness and service orientation must be a matter of course in customer advice and support. With a detailed ethics compass and anti-corruption regulations, precise guidelines have been created for BTU Business Travel Unlimited, which must be observed by all employees.

These guidelines also aim to raise awareness: Employees should recognize in good time if they might run the risk of acting against the Company's reputation.

Impeccable conduct within the Company in terms of a good corporate culture as well as externally towards customers and business partners is extremely important to us and there is no room for manoeuvre or grey areas regarding misconduct or even corruption. We want to point out the importance of this topic with ongoing, obligatory training courses.

As the largest business travel agency in Austria, we enjoy a high reputation.

However, this also entails a special responsibility which we want to fulfil in the interest of our customers.

ETHICAL COMPASS

1. BASIC PRINCIPLES

1.1 BASIC VALUES

Business Travel Unlimited Travel Agency GmbH (hereinafter: BTU) is an Austrian travel agency with an IATA license and worldwide agency agreements. BTU was founded in August 1993 and has developed over the years into a leading company in the field of "business travel management" in Austria. To solidify and expand its market position, Raiffeisenlandesbank Oberösterreich added its corporate clients to BTU's portfolio in 1999 and acquired a 74% stake. In 2021, BTU was fully acquired by Raiffeisenlandesbank Oberösterreich.

Since January 2022, BTU has been the No. 1 in the Austrian business travel market following the acquisition of VB Business Travel. The BTU Group consists of BTU, AX Travel Management and HBT Herburger Business Travel (HBT). As a network partner of American Express Global Business Travel (GBT), AX Travel serves global customers and is a wholly owned subsidiary of BTU. The market in western Austria is served by the joint venture company HBT. HBT is a 50.1% subsidiary of BTU and market leader in the business travel segment in Vorarlberg. 49.9% is owned by Klaus Herburger, who is one of the leading local providers with his tourism company Herburger Reisen.

The success of the BTU Group is primarily based on the highest level of customer orientation, motivated employees and entrepreneurial management. Our employees and customers are supported by state-of-the-art systems. This ensures that our customers receive a consistently high level of service in an innovative environment.

Our business behaviour is based on the following values:

Customer orientation, professionalism, quality, mutual respect and initiative, teamwork, integrity.

1.2 DIVERSITY AND DISCRIMINATION

We will not tolerate discrimination or harassment on the basis of nationality, culture, social or ethnic origin, marital status or family obligations, gender, age or religion, colour or race, gender, sexual orientation, mental or physical limitations, physical appearance or political opinion.

1.3 TARGET GROUP

The provisions of the Ethical Compass apply to all BTU Business Travel Unlimited employees and must be observed by them. We also place particular emphasis on the careful and thorough selection of our business partners, consultants and all other persons who support us in our business activities.

1.4 COMPLIANCE WITH THE LAW AND INTEGRITY

We respect the laws, rules and regulations in all countries where we operate. We strive to maintain the highest possible standards in the conduct of our business.

We respect human rights and promote their observance in the scope of our activities. We ensure this by:

- adhere to the ten principles of the UN Global Compact and implement them in our key business processes
- complying with international regulations on embargoes and trade restrictions, and
- not maintaining customer relations with companies and organisations that are proven to be in breach of the above points.

The principle of integrity also applies in the fight for market share. We do not enter into illegal agreements and adhere to the rules of fair competition and the relevant legal provisions.

1.5 COMMITMENT

Laws, regulations, standing instructions and the provisions of the Ethical Compass must be strictly observed. It is a binding set of rules and regulations for self-commitment in everyday business.

The Ethical Compass is intended as a guideline; it cannot be all-encompassing and include the correct behaviour for each individual situation. This is not the aim either. BTU Business Travel Unlimited trusts that each individual employee, on the basis of his or her training, commitment and moral integrity in all business activities, will decide in a well-considered and responsible manner which behaviour is appropriate in each individual situation.

The following questions should be asked to determine adequacy:

- Is an action permitted by law and does it meet the objectives of BTU Business Travel Unlimited?
- Does one have the “subjective feeling” that an action is right?
- Could it be justified before the Management of BTU Business Travel Unlimited or before public authorities?

In case of questions regarding the application of the Ethical Compass and in case of uncertainties regarding the direct or indirect impact of a business on the ethical objectives of BTU Business Travel Unlimited, a senior executive or the Management should be contacted.

1.6 REPORT IN CASE OF NON-COMPLIANCE

If an employee has reason to believe that there has been a breach of any legal requirements or of the provisions of this Ethical Compass or its implementing regulations, this should be reported immediately to a senior manager or directly to the Management. Such reports will be kept confidential.

1.7 SANCTIONS FOR VIOLATION OF THE ETHICAL COMPASS

The Ethical Compass forms an integral part of the - General Conditions of Employment. Violations therefore, also have consequences under labour law.

1.8 RESPONSIBILITY FOR COMPLIANCE WITH THE ETHICAL COMPASS

The ultimate responsibility for the uniform application of and compliance with the Ethical Compass lies with the Management of BTU Business Travel Unlimited.

Managers are responsible for the application of and compliance with the guidelines in their area of responsibility. The Management and all executives have a special responsibility to set an example.

2. WORKPLACE AND EMPLOYEES

2.1 MUTUAL RESPECT, HONESTY AND INTEGRITY

We respect the opinions of others and their personal dignity, privacy and personal rights.

2.2 EMPLOYMENT

Employees are recruited, promoted and assessed solely on the basis of performance-related criteria such as the achievement of agreed targets or professional experience. No discrimination or disadvantage (section 1.2) is tolerated in this respect either. We see ourselves as a company with high service orientation and social standards. This means that we also observe the principles of solidarity and subsidiarity in our personnel policy.

Respectful management enables us to ensure the greatest possible degree of job security for our employees who are willing to perform. Our remuneration policy is in line with international standards and is consistent with the business strategy, objectives, values and long-term interests of the Company and includes safeguards to avoid conflicts of interest.

The collective agreement negotiated in the spirit of social partnership and applicable to the industry serves as a basis.

2.3 EMPLOYEE REPRESENTATION

The Management and the works council work together in a constructive dialogue in an open and trusting manner and try to support the employees' concerns in the best possible way. The work of the employees on the works council is supported and appreciated. It must be ensured that members of the works council are not discriminated against on the basis of their activities and that they have the opportunity to carry out their tasks within working hours.

2.4 PERSONAL RESPONSIBILITY

All employees must act responsibly both inside and outside the Company. The fulfilment of this responsibility serves the protection and safety of the Company, its affiliated companies, its employees and its customers.

In the case of documents, particularly those with external impact, employees with signing authority must be aware of the responsibility and consequences when signing.

2.5 CONFLICTS OF INTEREST

Employees must ensure that any personal interests they may have do not conflict with their obligations to BTU Business Travel Unlimited or its customers.

Potential conflicts of interest may arise in particular in connection with gifts, invitations, procurement, transactions concerning financial instruments, and corruption, fraud or market abuse. If the impression of a conflict of interest exists, this must be reported to the higher-level manager or the - Management.

2.6 DATA PROTECTION

We take the greatest care when receiving, processing and storing information (name data, address and contact data, payment data (credit cards, bank details etc.), personal data, customer information, company data, file notes etc.). In doing so, we adhere to the stipulated data protection laws, data security standards and procedures and thus prevent unauthorised persons from viewing, using, changing or destroying this information.

2.7 INFORMATION FOR MEDIA REPRESENTATIVES

Statements to the media are made exclusively via the department responsible for media relations. This department coordinates the information with the Management of BTU Business Travel Unlimited and communicates it via the media and channels it usually uses.

3. BRIBERY AND CORRUPTION

3.1 BRIBERY

We do not tolerate any form of bribery or corruption. We do not take or provide undue advantage of any kind, whether the person offering or demanding is in the public or private sector. Neither employees nor other persons working for BTU Business Travel Unlimited make facilitation payments (giving small sums of money to public officials) in order to maintain or accelerate the services to which they are legally entitled.

We attach particular importance to the careful and thorough selection of our business partners, consultants, intermediaries and all other third parties who act on behalf of a Group Company and support us in our business operations.

3.2 GIFTS, INVITATIONS AND DONATIONS

Accepting and granting gifts and invitations may, under certain circumstances, be likely to have an undue influence on a business relationship. The acceptance and granting of monetary gifts, gratuities and sponsorship are subject to strict rules, which are detailed in the Anti-Corruption Guideline.

4. DEALING WITH CUSTOMERS AND BUSINESS PARTNERS

4.1 CUSTOMER SERVICE

BTU Business Travel Unlimited wants to constantly improve its service culture. To achieve this, employees must make every effort to understand the economic background and needs of customers, acquire the appropriate expertise and ensure that recommendations and arrangements for clients are made objectively, honestly and fairly and that customers are adequately informed about risks.

Only such products and services are to be offered which are suitable for the customer. There must be no discrimination (section 1.2) when entering a customer relationship.

4.2 CONFIDENTIALITY

All employees are obliged to treat customer information in strict confidence and in accordance with data protection laws and internal data protection guidelines.

4.3 KNOWLEDGE ABOUT CUSTOMERS (“KNOW YOUR CUSTOMER”)

Only the best possible information about the economic circumstances, the operational activities and the associated requirement of the customer enables optimal customer advice, support and assistance. BTU Business Travel Unlimited and its employees must ensure that:

- there is sufficient information about customers to know their needs, service possibilities and their field of activity
- sufficient information about customers is available to provide them with targeted and appropriate advice

- ▶ customers receive sufficient advice to enable them to select the BTU services that are most appropriate for them and to make decisions in line with their interests.

5. ACCOUNTING AND FINANCE

5.1 ACCOUNTING AND REPORTING

BTU Business Travel Unlimited undertakes to ensure the accuracy and precision of the accounting records. Importance is attached to the confidential treatment of security and personnel data as well as of accounting and financial data. All business transactions must be recorded in our books in accordance with our strict, established procedures and auditing standards and generally accepted accounting principles. These records contain the necessary information about the transactions concerned.

5.2 DISCLOSURE REQUIREMENTS

BTU Business Travel Unlimited undertakes, in the context of its disclosure obligations to the authorities and the public, to provide complete, fair, accurate and comprehensible data in a timely manner in all means of our communication. Our financial disclosure complies with the latest industry standards.

5.3 COOPERATION WITH SUPERVISORY AUTHORITIES

We commit ourselves to conduct our relations with the supervisory authorities relevant to BTU Business Travel Unlimited in an open, transparent and cooperative manner. We aim to ensure a stable relationship of trust between BTU Business Travel Unlimited and the authorities.

6. ETHICAL ACTING AS A TRAVEL AGENCY

6.1 GLOBAL CODE OF ETHICS

BTU Business Travel Unlimited is based on the Global Code of Ethics for Tourism of the World Tourism Organisation (WTO/OMT), a specialised agency of the United Nations based in Madrid with the task of promoting responsible, sustainable tourism. It promotes socially, environmentally and economically sustainable development in tourism at international level.

6.2 CONTRIBUTING TO MUTUAL UNDERSTANDING AND RESPECT BETWEEN CULTURES

In conducting its business, BTU Business Travel Unlimited respects and promotes efforts to establish tourism as a contribution to international understanding and thus to building mutual respect between people of different cultures. We regard the following as basic prerequisites:

- ▶ Tolerance and respect for other religious, philosophical and moral beliefs.
- ▶ Adapting tourist activities and behaviour to the laws, traditions and customs of the host regions and countries.
- ▶ Respect for equality between men and women in tourism activities.

- Promotion of human rights, and in particular individual rights of children, the elderly, the disabled, indigenous peoples and ethnic minorities.

6.3 COMMITMENT TO RESPONSIBILITY FOR SUSTAINABLE TOURISM

BTU Business Travel Unlimited sees itself as a constructive part of a functioning economy. We try to support sustainable economic growth that will also be fair to future generations through serious and customer-oriented behaviour on the one hand and the desire to treat the environment responsibly on the other hand.

BTU Business Travel Unlimited is also pushing the integration of partner services in the field of sustainability, in particular providers for CO2 compensation.

6.4 CORPORATE BEHAVIOUR AS PART OF THE SUSTAINABILITY CULTURE

BTU Business Travel Unlimited is committed to sustainability as part of its corporate culture. This orientation is also practised within the Company, for example in waste reduction, the avoidance of plastics as far as possible and an established recycling system.

6.5 SUPPORT TO RAISE THE LIVING STANDARDS OF THE LOCAL POPULATION

We support the efforts to make tourism also an activity for the benefit of the local population. BTU Business Travel Unlimited stands for values such as:

- Creating tourism-related jobs for the local population.
- Involving the local population in tourism planning and activities.
- Particular attention to specific problems of coastal areas, islands and sensitive rural and mountain areas.

6.6 SUPPORT FOR THE RIGHTS OF PEOPLE WORKING IN TOURISM

BTU Business Travel Unlimited contributes, for example by selecting its partners, to ensuring that the fundamental rights of workers in the tourism industry are particularly respected and that their compliance is supported.

6.7 CHILD PROTECTION

BTU Business Travel Unlimited rejects any exploitation of children in and by tourism, whether through child labour or the worst form of exploitation in the form of commercial sexual exploitation.

UNICEF, the World Tourism Organisation and ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes) International have developed a code of conduct to protect children from sexual exploitation in tourism. This is intended to actively involve the tourism industry in the fight against sex tourism involving children. BTU Business Travel Unlimited fully supports this code of conduct.

ANTI-CORRUPTION GUIDELINE

1. INTRODUCTION

1.1 GENERAL INFORMATION

The prevention of and fight against corruption has brought about drastic legal changes worldwide in recent months and years. Corruption is an internationally prosecuted criminal offence and must be targeted in both the private and public sectors.

BTU Business Travel Unlimited actively assumes its responsibility in the field of preventing and combating corruption and, with this Guideline, implements rules of conduct that meet international standards.

Bodies and employees do not pay bribes or other benefits to public officials or private individuals that could be interpreted as influencing (enticing). Indirect bribery by third parties is not tolerated either.

1.2 OBJECTIVE OF THE GUIDELINE

The purpose of this Guideline is to provide clear guidance and instructions for action to eliminate uncertainties and exclude possible acts of corruption.

2. DEFINITION OF TERMS

2.1 GIFTS

Gifts are all assets, benefits (e.g. money, vouchers, nonmonetary gifts, unusual discounts, holiday trips) or benefits of an intangible nature. BTU Business Travel Unlimited has decided on a general value limit of EUR 200.00 for gifts.

2.2 INVITATIONS

Invitations are understood to include hospitality (lunch and dinner), invitations to cultural, sporting and other events, leisure activities, conferences, marketing or similar events.

2.3 SPONSORSHIP

Sponsorship is the support of a person/ group/ organisation through financial means, payment in kind and/or services. In return, the sponsor's name is linked to the supported activity or organisation, the sponsor's level of awareness is increased and the brand or name is positively associated. The difference to charitable donations or patronage lies in the commercial orientation and the business advantage for both sides.

2.4 CHARITABLE CONTRIBUTIONS (DONATIONS)

Charitable donations are made for the benefit of the community in the scope of the Company's social responsibility and without expecting any concrete consideration.

2.5 POLITICAL CONTRIBUTIONS

In addition to contributions to political parties, political contributions include contributions to candidates for political office, contributions to persons in their capacity as politicians and contributions to political organisations. It is irrelevant whether these contributions are made directly or indirectly via an intermediary and consist of a financial contribution or a payment in kind.

2.6 CONFLICTS OF INTEREST

Conflicts of interest in connection with the prevention of corruption are significant when the personal interests (e.g.: individual financial situation, friendship) of bodies or employees conflict with the interests of BTU Business Travel Unlimited and/or the Company's interests conflict with those of its customers.

3. GIFTS AND INVITATIONS

3.1 GIFTS AND INVITATIONS TO THE MANAGEMENT / EMPLOYEES

3.1.1 General requirements for an acceptable contribution

The contribution must not be likely to influence management or employee decisions in any way in a specific business case or regarding a specific decision. This applies even if the decision brought about by the contribution is made entirely in accordance with the Company's duties. Acceptance of the contribution may not lead to the use of extraneous criteria in future decisions.

3.1.2 Gifts and invitations to the Management

The contributions for members of the Management and supervisory boards consist of attentions that are in line with honest market practices and are socially appropriate. Sole business lunches in the private sector do not need to be reported. The decision to accept gifts and invitations is the responsibility of the respective member of the Management. In case of doubt as to the probity of the gift or invitation, the entire Management must be involved.

3.1.3 Gifts and invitations to other people

a) Value limit

Such contributions up to a value of EUR 200.00 per recipient are permitted, which are in line with everyday business practices and appropriate to the business relationship (in particular evening invitations, Christmas, anniversary or birthday presents). Circumvention of the EUR 200.00 limit by means of multiple contributions in close temporal connection is not permitted. In any case, there is a close temporal connection in the case of multiple contributions within a period of three months.

b) Approvals if the value limit is exceeded

Gifts and invitations exceeding the value limit of EUR 200.00 may only be accepted if:

- they relate to the one-off contribution, which is in line with fair market practices and the position of the beneficiary (a meal or a social or sporting event), and
- the person to whom the contribution is offered complies with the requirement to inform the higher-level manager or the Management in advance about such a contribution.

c) The tax treatment of such benefits must be agreed with the Human Resources Department.

3.1.4 Information to the Management

In the event of an invitation to a member of Management for the equivalent of EUR 500.00 or more, the entire Management will be informed in any case.

3.1.5 Travel and accommodation costs

Travel and accommodation costs must generally be borne by the participants themselves, but may be borne by the Company if there is an objectively justified interest in the accommodation (e.g. in the case of specialist events lasting several days).

3.2 GIFTS AND INVITATIONS BY COMPANY / MANAGEMENT / EMPLOYEES

3.2.1 General requirements for a permissible contribution

The granting of the contribution must not be suitable for influencing decisions of the donee or invited person in any direction in a concrete business case. This also applies if the decision brought about by the gift is made entirely according to the best judgement. The gift or invitation may not lead to the use of irrelevant criteria in future decisions. It is absolutely inadmissible to make gifts which are intended to cause the recipient to act contrary to duty.

3.2.2 Gifts and invitations from the Management

Contributions by management members consist of small tokens of appreciation that are in line with honest - market practices and socially adequate.

Before issuing invitations or gifts of more than EUR 200.00, the higher-level manager or the Management must be contacted in order to bring about an assessment. Sole business lunches in the private sector are not to be reported.

The decision on the contribution lies with the respective member of the Management. In case of doubt about the probity, the entire Management must be involved.

3.2.3 Gifts and invitations from other persons

a) Value limits

It is permitted to grant contributions of a value of up to EUR 200.00 per recipient, which are in line with

everyday business practices and appropriate to the business relationship (in particular evening invitations, Christmas, anniversary or birthday gifts). Circumvention of the EUR 200.00 limit by means of multiple contributions in close temporal connection are not permitted. In any case, there is a close temporal connection in the case of multiple contributions within a period of three months.

b) Approvals when value limits are exceeded

Gifts and invitations exceeding the value limit of EUR 200.00 may only be granted if:

- they consist of a one-off contribution, in accordance with honest market practices and the position of the recipient of the grant (such as to a meal or a social or a sporting event.
- and the person offering the contribution informs the higher-level manager or the Management in advance about the planned contribution.

3.2.4 Information to the entire Management

In the event of an invitation by a member of the Management from a value limit of EUR 500.00, the entire Management will be informed.

3.2.5 Special arrangements

- Supervisory bodies and officials:
No gifts and invitations may be granted to persons who exercise official supervisory functions vis-à-vis BTU Business Travel Unlimited (supervisory authority, tax office, labour inspectorate, trade authority). Small refreshments (water, coffee, simple snacks) are allowed.

Neither the institutions nor the staff nor any other person working for BTU Business Travel Unlimited make facilitation payments (giving small sums of money to public officials) in order to maintain or expedite the services to which a legal entitlement exists.

- The upper value limit of EUR 200.00 must always be observed for all invitations to public officers. The invitation must be customary in the locality, appropriate to the function of the official and may not be suitable for influencing a public officer. Under this premise, invitations are possible for example to widely distributed marketing events (e.g. public transport conferences or other tourist events). Gifts to public officials are only permitted in the scope of small tokens of appreciation.
- Invitations in connection with sponsoring activities:
If BTU Business Travel Unlimited acts as an event sponsor (e.g. VIP tickets for tennis tournaments, theatre tickets in connection with sponsoring for Bundestheater), invitations will be issued in accordance with the Sponsoring Guidelines (see below). The corresponding invitation lists will be determined by the Management in accordance with the principles of this Guideline.

- › Events lasting several days:
In the case of invitations to events lasting several days, the professional character of the event must clearly have priority (specialist lectures, subject-related visits, etc.).

4. CHARITABLE DONATIONS AND SPONSORING

4.1 REQUIREMENTS FOR PERMISSIBLE DONATIONS AND SPONSORING

It is not the aim of this Guideline to prevent charitable donations and sponsorship. However, transparency and clear documentation are required.

a) Requirements for sponsoring are:

- › There are no conflicts of interest between BTU Business Travel Unlimited, the institutions and staff on the one hand and the recipient of the grant on the other (e.g. family background).
- › There is a sponsorship contract between BTU Business Travel Unlimited and the sponsored person. The consideration for sponsorship consists of the association of BTU Business Travel Unlimited with the sponsored person organisation and thus increased visibility and awareness of BTU Business Travel Unlimited.

b) Requirements for charitable donations:

- › There are no conflicts of interest (see point 4.1(a)) between BTU Business Travel Unlimited on the one hand and the recipient of the contributions on the other.
- › BTU Business Travel Unlimited makes charitable contributions and donations only to those organisations or individuals that have been evaluated according to an internal guideline.
- › The contributions are made without the intention of receiving any consideration. They must be reasonable and legal and be made in a transparent and open manner.
- › The contributions are related to the Company's economic situation.
- › The sponsored contributions are appropriate to the circumstances (e.g.: according to the arm's length principle)

5. CONTRIBUTIONS TO POLITICAL PARTIES AND POLITICAL EXPONENTS

Contributions to political parties and political exponents may only be made under the following conditions:

- › There are no legal regulations to prevent the contribution from being granted.
- › In particular, the contributions are not suitable to influence an official's administration.
- › Contributions are subject to Management approval.

6. REVIEW OF THE GUIDELINE

Management and the Executive Board will regularly (at least once a year or as required) and continuously monitor compliance with this Guideline.