

# FLiX Business Partner Code of Conduct



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# FLiX Business Partner Code of Conduct



As an international company, the FlixMobility Group (“FLIX”) has enacted a comprehensive code of conduct regarding fair, ethical and non-discriminatory business conduct applying to all FLIX entities and FLIX is committed to ensure these principles together with its partners, (sub)suppliers, their employees, and all other business partners (hereinafter together referred to as Business Partner).

This Business Partner Code of Conduct (the “Code of Conduct”) shall serve as a binding default which shall set the benchmark under which the behavior of FLIX and each Business Partner shall be judged when it comes to the ethical and legal standards which shall form the basis of every business relationship between FLIX and Business Partner. As such this Code of Conduct may be used for the interpretation of the fundamental principles that underly any contractual relationship between FLIX and Business Partner.

By entering a business relationship with FLIX, each Business Partner acknowledges and accept the applicability of this Code of Conduct and confirms that it obliges to adhere to the principles and rules set out herein. The principles and rules set out herein shall be accounted for against all activities of a Business Partner, including their employees.



» The principles and rules of this Code of Conduct shall not be circumvented, e.g., by using (sub) suppliers or the outsourcing of non-compliant activities. «



# 01 General Compliance with Law



FLIX is committed to comply with the applicable laws of all countries, in which we conduct business, e.g., regarding human rights, anti-corruption, data protection, competition law, antitrust, anti-money laundering, regulatory requirements, tax, and environmental laws, irrespective of any potential commercial disadvantages this may cause.



We expect the same commitment from our Business Partner. Our Business Partners shall observe all aspects of this Code of Conduct including the human rights and environmental aspects of this Code of Conduct in an appropriate way.



Our Business Partners must ensure that their (sub) suppliers do not violate the standards, set out in this Code of Conduct. They are further required to issue written regulations to their (sub)suppliers and to establish and document suitable and appropriate control mechanisms.



We and our Business Partners shall in particular respect in all cases the internationally proclaimed human rights, including the International **Bill of Human Rights** and the principles concerning fundamental rights set out in the **International Labor Organization's Declaration on Fundamental Principles and Rights at Work** including No. 29



Incl. Protocol from 11.06.2014, 87, 98, 100, 105, 111, 138 and 182 and their Protocols, as well as the International Pacts from 19.12.1966 on (1) civil and political rights economic and (2) on social and cultural rights.



These fundamental principles shall form the basis for this Code of Conduct and may be referred to in interpreting this Code of Conduct. In case of differences between national laws, this Code of Conduct and relevant international policies or guidelines, the more stringent regulations will apply.



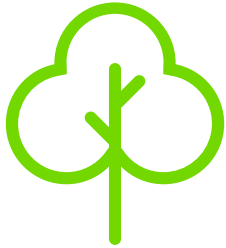
## 02 Anti-Discrimination and Harassment



- FLIX imposes high standards on its employees with respect to respectful treatment of partners, colleagues, and other stakeholders and in relation to anti-discrimination and harassment.
- Likewise, each Business Partner shall ensure that employees, customers, and partners (incl. their employees) are treated with respect and consideration, regardless of race, gender identity, sexual orientation, physical or mental ability, religion, political affiliation, genetic information, or nationality, both internally and externally.
- None of the aforementioned characteristics shall form the basis or reason for discrimination, either directly or indirectly. Indirect discrimination means imposing a condition, requirement or practice that is unreasonable or puts a person or group of people at a disadvantage based on the characteristics listed above.
- There will be no tolerance for any form of harassment, including, among others, improper threats of violence, assault, personal attack, or sexual behavior.



## 03 Environmental Protection



- FLIX is aware of its responsibility to protect the environment, therefore we also expect our Business Partners to share our commitment by paying attention to environmental protection.
- As part of this commitment, Business Partners must comply with all applicable laws and regulations regarding the protection and preservation of the environment, in particular the Minamata Convention of October 10, 2013, and the Stockholm Convention of May 06, 2005.

## 04 Bribery and Anti-corruption



- FLIX does not tolerate in any way the offering, payment, soliciting or acceptance of corruption or bribes in any form.
- FLIX's Business Partners shall refrain from all forms of active or passive corruption, bribery, and other improper influences on FLIX or Business Partner's staff, public officials and other third parties.
- Relationships between FLIX and public officials, companies and private parties must be established in a way any suspicion of corruption is avoided.
- We therefore do not permit the offering or granting of any form of favor or benefit that may be interpreted as an attempt to exert improper influence.

## 05 Competition and Antitrust Law



- FLIX does and Business Partner shall observe applicable laws for the protection and promotion of competition, in particular antitrust laws, and regulations.
- In particular, no arrangements or agreements which shall be made which would influence prices and/or conditions in an inadmissible way or restrict free competition in any other inadmissible manner.
- Illegal exchange of information or price fixing agreements with competitors or suppliers must not occur. We explicitly oppose espionage, theft and use of other illegal methods to gain information on competitors or their business activities.



## 06 Anti-Money Laundering



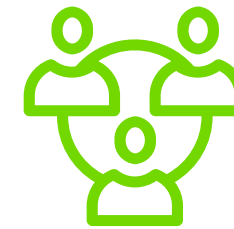
- FLIX respects the laws aiming at combatting money laundering and terrorist financing and consequently,
  - FLIX is requiring and depending on Business Partner refraining from any money laundering or terrorist financing activities and Business Partner will take the necessary measures and precautions to prevent money-laundering and terrorist financing activities within the sphere of its influence.
- Measures will be taken to apply and to not violate any applicable sanction and/or embargo restrictions.

## 07 Workers' Rights, inappropriate labor



- It is important and FLIX is expecting Business Partners and their (sub)suppliers to comply with all applicable employment and wage regulations and all regulations concerning employees' rights.
- This includes, in particular, all applicable local laws pertaining to working hours and minimum wages as well as granting of compulsory employee benefits.
- It is self-explanatory that there will be no tolerance regarding any utilization of child or forced labor.

## 08 (Sub)suppliers



- The Business Partner undertakes to actively demand and monitor compliance with the requirements set out in this Code of Conduct or equivalent requirements when contracting with third parties throughout its supplier chain in an adequate manner.
- Our Business Partners must ensure that their (sub)suppliers do not violate the standards, set out in this Code of Conduct. They are further required to issue written regulations to their (sub)suppliers and to establish and document suitable and appropriate control mechanisms.
- To the greatest extent possible Business Partner shall allow FLIX to be involved and take part in the (sub)supplier monitoring.





# 09 Compliance, Monitoring and Rectification

- In relation to possible non-compliance measures shall be taken to effectively counteract any unlawful actions through the use of adequate procedures.
- It is the responsibility of each entity and each Business Partner to ensure that its employees and (sub)suppliers are informed about and comply with the principles set out in this Code of Conduct.
- Upon request, Business Partner must, by way of providing information and/or allowing access to premises to FLIX or its representatives, verify to FLIX’s reasonable satisfaction, that the Business Partner and its (sub)suppliers comply with this Code of Conduct. The Business Partner agrees to cooperate with FLIX to the greatest extent possible when it comes to implementing or adjusting compliance monitoring processes reasonably required by FLIX.



# 10 Data protection and safeguarding of trade and business secrets

- Protecting personal data is important for FLIX and any FLIX customer and FLIX and Business Partners are required to observe all applicable laws on protecting personal data of all parties' employees, customers, and partners.
- FLIX and its Business Partner shall handle all information of the other that may reasonably likely be considered business or trade secrets as confidential information.
- Confidential information may not be released, passed on to third parties or made available in any other way without authorization. Confidential information must be secured at all times, including using appropriate technical means.



## 11 Consequences of Breaching this Code of Conduct

In case of serious or repeated violations of this Code of Conduct, FLIX is entitled to terminate existing contractual relationships with immediate effect.

The Business Partner as well as their (sub)suppliers are liable to FLIX for any damages caused by violating the rules set out in this Code of Conduct. Further rights under applicable law or contract remain unaffected.



# 12 Ask Questions and Report Concerns

If you have a question or concern about compliance with any provision in this Code, we encourage you to work with your primary contact at the Company to get the answers you need to comply.

If you have a concern about potential illegal or unethical conduct in connection with your relationship with us, please report it to the FLIX compliance desk:

**[Fairbusiness@flixbus.com](mailto:Fairbusiness@flixbus.com)**

