

Code of Conduct

1. Purpose and scope

This Code of Conduct guides us in our professional activities. It describes good work practices but does not prevent the exercise of better judgement according to the circumstances at hand. It helps us to be respectful to each other and behave in an honest manner towards ourselves and others. This Code of Conduct covers all aspects of the company's operations, staff events and professional travel. It applies to employees, managers and the company's Board alike.

2. Personal conduct

- We treat colleagues and business partners with respect and do not tolerate harassment, sexual harassment, gender-based harassment or other forms of violence under any circumstances.
- We do not discriminate on the basis of gender, religion, beliefs, ethnic origin, race, colour, financial situation, origin, disability, age or on any other grounds.
- We work conscientiously and diligently and ensure that our conduct does not impact negatively on our work or the company as a whole, both within and externally.
- We make every effort to show respect in our business dealings and foster positive and constructive communication.

3. Governance

- We operate in accordance with proper and sound business practices and customs and endeavour at all times to combat corruption, bribery, blackmail and embezzlement.
- We do not abuse our position or power for our own personal interest.
- We do not give or accept gifts or other concessions – whether direct or indirect – for ourselves or others that could influence our independence or impartiality in our work.
- We do not participate in handling matters concerning our own or related parties' interests, and we inform managers of any aspects that may cause conflicts of interest.

4. Provision of information and confidentiality

- We care about privacy and respect the feelings and privacy of others.

- We do not release images or other material publicly, including on social media, which could cause the company, its staff, its customers, its business partners or passengers harm in any way, unless consent has been obtained.
- We do not use information obtained in the course of our professional duties for our own personal interests. Particular care must be taken in the use, storage, copying and deletion of confidential information, including surveillance camera footage.
- We respect the confidentiality of confidential information, even after we have left employment.

5. Business practices

- We are professional and honest, and we demonstrate this by following accepted management practices.
- We always operate in accordance with the General State Ownership Policy, the company's strategy, policies and the current Code of Conduct.
- We consider the economic, social and environmental impact when making decisions, thereby achieving sustainability.
- We operate in accordance with the ten basic rules of the United Nations on human rights, work issues, environmental issues and actions against corruption, and we take account of the UN Global Goals in our work. We make the same demands of our suppliers, in accordance with the codes of conduct for suppliers.
- We endeavour to ensure, when making decisions, that we are always complying with current laws, regulations and international conventions that the company operates under.

6. Penalties for breaches of the Code of Conduct

Serious or repeated breaches of the Code of Conduct may lead to termination of employment. Breaches and deviations can have serious consequences, and staff may also bear personal responsibility for actions or omissions.

This Code of Conduct shall be presented to staff and made available on the company's intranet and external website.

This Code of Conduct is now in force, and the Managing Director of the Isavia Group is responsible for its execution.

Approved by the Isavia board on 24 February 2022.

