

Amadeus Code of Ethics and Business Conduct for Third Parties

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(External)

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Scope

This **Code of Ethics and Business Conduct for Third Parties** applies to Amadeus third parties who work or provide any kind of product, service or goods to Amadeus, including but not limited to business partners, vendors, consultants, agents (“**Third Parties**”).

Amadeus has identified and endorsed its key corporate values in our Code of Ethics and Business Conduct (the “**CEBC**”). It reflects who we are and how we conduct our business. Our guiding principle is integrity - the personal integrity of each and every member of the Amadeus community and our professional integrity as a business organization.

As part of our commitment to act with integrity, this Code of Ethics and Business Conduct for Third Parties outlines the **minimum ethical standards expected from Third Parties** of Amadeus, such as business ethical, governance, social and environmental commitments.

Third Parties of Amadeus must act in **strict compliance with all appropriate laws and regulations** in all countries and jurisdictions in which they operate, such as laws and regulations pertaining to health and safety, labor, human rights and discrimination, insider trading, taxation, data privacy, competition and antitrust, the environment, public tenders, fraud and corruption prevention.

Human rights, labor rights and non-discrimination

Third Parties are expected to treat people with respect and dignity, promote equal opportunity and share Amadeus’ commitment to human rights and labor rights, in accordance with internationally recognized standards regarding working conditions and the dignified treatment of employees. Third Parties must ensure that they promote diversity, equity and inclusion of all workers.

Third Parties must adopt measures and controls that ensure **forced, or child labor, human trafficking** or any other form of **modern slavery** is not used and is prohibited in the performance of work. Third Parties must guarantee that **working hours and working conditions** (including secure employment, adequate wages and work-life balance) are in accordance with local laws and regulations. Moreover, Amadeus expects all Third Parties to **treat their employees fairly, to avoid any type of discriminatory practice** and to provide **equal employment and pay opportunities** to employees and applicants for employment. Third Parties must consider the rights of workers to **legally organize, associate freely** and communicate openly with management regarding their working conditions **without the fear of harassment or penalty**. Additionally, Third Parties shall ensure the protection of workers in the workplace, implementing measures that guarantee their **health and safety**.

Third parties shall cooperate in the identification of the human rights impacts relating to the operations, products or services that they provide to Amadeus as included in Amadeus Human Rights policy as shared with Third Party or published by Amadeus.

Anti-bribery, corruption, fraud and conflicts of interest

We expect Third Parties to conduct their business in compliance with applicable laws and regulations, both locally and internationally, in all the countries where they operate. Third Parties must act with personal and professional integrity and have the highest standards of ethical conduct. Particularly, Third Parties are required to refrain from any form of fraud, corruption or actions that could potentially be interpreted as such.

Third Parties shall abstain from offering, promising, granting illegal benefits or anything of value or making any **improper payments** to public officials, to decision makers operating in the private sector or to other persons in order to achieve a preferential treatment or a favorable decision. Moreover, Third Parties must ensure that the offering or reception of any **gifts, entertainment or business courtesies** are permitted by law, and these exchanges are consistent with reasonable marketplace customs and practices. Third Parties must refrain from making **illegal donations, sponsorships and patronage** that conceal facilitation payments, bribes or any act of corruption. In addition, Third Parties shall have a reasonable **due diligence process to prevent and detect corruption** in their business arrangements with third parties.

Third Parties must avoid **conflicts of interest**. Particularly, Third Parties are expected to notify all affected parties and disclose to Amadeus all available information in the event of actual or potential conflict of interest.

In relation to their actions in the market and with competitors, Third Parties must operate in absolute compliance with applicable competition and antitrust rules and avoid engaging in any monopolistic or anti-competitive conduct.

In addition, Third Parties must ensure compliance with local tax regulations in the countries in which they operate.

Safeguarding information, personal data, and confidentiality

Professional handling of information is our business. Our reputation as a trusted partner depends critically on the safe, secure, reliable, and efficient processing of sensitive information, including passenger data and other information about our customers and their clients.

We require Third Parties to act according to these principles and **properly handle confidential information**.

Moreover, Third Parties shall comply with all relevant **data protection and privacy regulations** and conduct data processing within the framework of their contractual relationship with Amadeus, ensuring the adoption of sufficient security measures to protect and safeguard the confidentiality of non-public information owned by third parties and Amadeus.

Additionally, Third Parties must ensure the responsible use of technologies, to ensure the protection of information and the freedom of decision of consumers.

Likewise, Third Parties will refrain from carrying out any conduct that may involve the manipulation or restriction of the data of third parties for the purposes of censorship, economic advantage or any other type of interest that puts the freedom and security of the information at risk. In addition, Third Parties must refrain from transmitting data about individuals without the prior knowledge and consent of the persons concerned.

Commitment to the environment

Amadeus expects its Third Parties to comply with all applicable environmental laws and regulations and to adopt a precautionary principle in relation to the environmental footprint of their operations. We expect Third Parties to analyze their environmental impacts, to implement environmental best practices to improve performance and to regularly follow up results for continuous improvement. We expect Third Parties to focus on specific topics such as, climate change mitigation -including energy consumption and the reduction of greenhouse gas emissions- and adaptation, pollution, water, biodiversity and ecosystems, circular economy, waste generation and use of natural resources, if applicable to their business activities. Amadeus is committed to effectively transfer the principles contained in Amadeus Environmental Policy to Third Parties.

Minority and community rights

Amadeus is committed to the **socio-economic development of the communities** in which it operates.

Third Parties must refrain from any conduct that undermines minority rights or local community rights in all the territories where they operate.

Non retaliation for reports of concern

Third Parties should have a policy and process in place for reporting workplace concerns. The policy and process should be transparent and understandable and must provide **protection from retaliation**.

Speak Up: Reporting actual or Suspected violations of this Code

Acts contravening this Code can be **safely and confidentially reported** using the **Amadeus Speak-Up Policy**, available [here](#), which guarantees a way to report, that reports will be heard and investigated, and that any report will be treated with utmost confidentiality and anonymity. It also guarantees that Reporting Parties will not be subject to any retaliation when you file a report in good faith.

To ensure **confidentiality, anonymity and no retaliation**, please ensure reports are filed through the [Speak Up Reporting channel](#). At a minimum, we encourage you to set up a “secured postbox”, if you choose to stay anonymous, which will allow communication with you to assist in the investigation process and provide status of your report.

Consequences of violating this Code

In the event of **failure to comply** with the principles of this Code of Ethics and Business Conduct for Third Parties, the business relationship may be terminated or reviewed, and corrective action pursued subject to applicable laws and regulations or to the terms and conditions agreed with Amadeus in applicable contracts with Third Parties.

Implementation

Amadeus may update this Code of Ethics and Business Conduct for Third Parties from time to time, and **Third Parties will comply with the latest version** of this Code, which is made available on www.amadeus.com.

Third Parties subject to this document shall adhere to this Code of Ethics and Business Conduct for Third Parties and demonstrate the fulfillment of the requirements. They shall cooperate with Amadeus and provide any documents confirming compliance with the commitments and/or their performance, if requested.