

# Travelport Business Partner Conduct and Ethics Policy



**Compliance and Ethics**

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**TABLE OF CONTENTS**

**INTRODUCTION..... 3**

- DOES THIS POLICY APPLY TO ME? ..... 3
- WILL THIS POLICY TELL ME EVERYTHING I NEED TO KNOW? ..... 3
- WHAT HAPPENS IF I DON’T COMPLY WITH THE POLICY? ..... 3
- WHERE CAN I GO FOR HELP? ..... 3
- WHAT IS THE INTEGRITY LINE? ..... 3
- WHAT IS COMPLIANCEANDETHICS@TRAVELPORT.COM? ..... 4
- WHAT ABOUT RETALIATION? ..... 4

**WORKPLACE AND ENVIRONMENT ..... 4**

- EQUAL EMPLOYMENT OPPORTUNITY ..... 4
- HARASSMENT-FREE WORKPLACE ..... 4
- SUBSTANCE ABUSE ..... 4
- WORKPLACE VIOLENCE ..... 4
- ENVIRONMENT..... 4
- HUMAN RIGHTS ..... 4
- HEALTH AND SAFETY ..... 5

**WORKING WITH OTHERS ..... 5**

- ANTITRUST AND COMPETITION..... 5
- COMPETITIVE INTELLIGENCE ..... 5
- FAIR DEALING..... 5
- CONFLICTS OF INTEREST ..... 5
- EXTERNAL COMMUNICATIONS ..... 6
- CORRUPTION AND BRIBERY..... 6
- MARKETING, ADVERTISING AND PROMOTIONS..... 6

**PRIVACY..... 6**

- PRIVACY AND PERSONAL INFORMATION ..... 6
- TRAVELPORT EMPLOYEE CONFIDENTIALITY ..... 7

**INSIDER TRADING AND NON-PUBLIC INFORMATION ..... 7**

- MONEY LAUNDERING OR ILLICIT FINANCING ..... 7
- TRADE SANCTIONS ..... 7
- INTELLECTUAL PROPERTY OF TRAVELPORT ..... 7
- INTELLECTUAL PROPERTY OF OTHERS..... 7
- USE OF INFORMATION ASSETS..... 7

**COMPANY BUSINESS INFORMATION AND RECORDS..... 8**

- CONFIDENTIAL AND PROPRIETARY INFORMATION ..... 8
- FINANCIAL REPORTING AND RECORDS..... 9

## INTRODUCTION

Travelport is committed to the highest standards of compliant and ethical conduct in its business dealings. All business partners that provide services to Travelport must behave in a manner that does not damage Travelport's reputation. This Business Partner Conduct and Ethics Policy ("Policy") describes how Travelport expects its business partners to behave and as such represents the standards that business partners must observe.

### Does this Policy apply to me?

***The Policy applies to all companies doing business with Travelport (referred to in this document as "business partners.")***

This Policy is designed to assist business partners, acting through their employees, officers and directors, in conducting their daily activities ethically and legally as an integral part of doing business with Travelport.

### Will this Policy tell me everything I need to know?

This Policy is not intended to cover every situation that might arise, nor will it take account of every legal requirement, but is intended to help business partners make the right decisions and ask the right questions.

### What happens if I don't comply with the Policy?

It is the responsibility of all business partners to know, understand, and comply with this Policy, subject to applicable law.

A failure to comply with this Policy may result in Travelport terminating its business relationship with a business partner, among other consequences.

### Where can I go for help?

If you observe or become aware of an actual or potential violation of any law, regulation, or provision of this Policy, report the circumstances in an appropriate and timely manner to Travelport. The Policy is designed to foster open communications and give business partners and their personnel the means to report in good faith any potential violation of law or business ethics.

For assistance with compliance and business ethics matters relating to Travelport, contact [complianceandethics@travelport.com](mailto:complianceandethics@travelport.com), or call Travelport's "Integrity Line."

### What is the Integrity Line?

The Integrity Line is a service established by Travelport to enable concerned parties to make confidential reports of possible violations of this Policy.

The Integrity Line's number is +1 855 224 4258. Callers in all countries can dial the number directly. The Integrity Line is available 24 hours a day, seven days a week and is staffed by an outside, independent organization. Calls are answered in local languages where possible.

Calls may be placed to the Integrity Line to report actual or potential violations of this Policy, including concerns regarding accounting, auditing and financial reporting matters. If a concerned person calls the Integrity Line, a call specialist will listen to the report or inquiry, make a detailed summary of the call and forward the information to the appropriate individual(s) within Travelport to look into the matter. Every effort will be made to keep the identity of anyone reporting an actual or potential violation confidential to the extent permitted by law, unless doing so will prevent Travelport from fully and effectively investigating suspected misconduct. The Integrity Line will not record calls or use call identifiers.

Possible violations may also be reported via the internet at the following webtext address:  
<https://iwf.tnwgrc.com/travelport>

All reports in to the Integrity Line are investigated.

### **What is [complianceandethics@travelport.com](mailto:complianceandethics@travelport.com)?**

[Complianceandethics@travelport.com](mailto:complianceandethics@travelport.com) is a mailbox that is available to any concerned party. Use this mailbox to ask questions or get advice on Travelport Compliance and Ethics related matters. The mailbox is monitored by the Travelport Compliance and Ethics team, who will respond to your query or engage someone who will be able to help.

### **What about retaliation?**

Travelport will not tolerate retaliation against any business partner who, in good faith, lawfully and truthfully, seeks advice, raises a concern or reports any potential violation of this Policy. If you suspect retaliation against you or someone you know, immediately contact the Integrity Line.

## **WORKPLACE AND ENVIRONMENT**

**Equal employment opportunity:** Business partners are expected to foster a work environment in which all individuals are treated with respect and dignity. Business partners must not to discriminate either against employees or potential employees on the basis of race, color, religion, sex, sexual preference/orientation, citizenship, marital status, veteran status, national origin, age, physical or mental disability, or against any other group protected by applicable law or applicable company policy.

**Harassment-free workplace:** Travelport expects business partners to commit to providing a workplace that is free of harassment, bullying and other unlawful conduct. Harassment based on sex and other categories protected by law is illegal in most countries and business partners should prohibit their staff from engaging in any form of sexually harassing behavior, harassment based on any other protected category, or unlawful bullying. Sexual harassment includes, but is not limited to, unwelcome sexual conduct, either visual, verbal or physical, and may include, but is not limited to, unwanted sexual advances, unwanted touching and suggestive touching of self or others, language of a sexual nature, telling sexual jokes, innuendoes, suggestions, suggestive looks and displaying sexually suggestive visual materials.

**Substance abuse:** Travelport is committed to maintaining a safe and healthy work environment free of substance abuse and expects business partners to adhere to the same high standards. Business partner personnel are expected to perform their responsibilities in a professional manner and to be free from the adverse effects of illegal drugs, alcohol or other substances that may hinder job performance or judgment. Business partner shall ensure that its personnel are aware that they are prohibited from the illegal use, sale, dispensing, distribution, purchase, possession or manufacture of illegal drugs or other controlled substances, while performing services for Travelport.

**Workplace violence:** A business partner shall provide a workplace that is free of violent and abusive behavior.

**Environment:** Travelport recognizes its responsibility to reduce our impact on the environment and accordingly each business partner should strive to be an eco-friendly business. A business partner must comply with all applicable environmental laws and prevent or mitigate any adverse environmental impact in all its business activities.

**Human Rights:** Travelport is committed to supporting and respecting the principles set out in internationally proclaimed human rights. Travelport will not tolerate child and forced or compulsory labor where used by a business partner or at any point in the business partner's supply chain. Each

business partner shall ensure that the employment of workers adheres to all applicable laws and regulations.

A business partner shall make every endeavor to be fully aware of human rights issues, such as human trafficking and slavery, and shall conduct itself in a manner that will foster respect, dignity and equality for all.

**Health and safety:** A business partner shall commit to providing its employees with a healthy and safe workplace in compliance with applicable laws. Business partners shall ensure that they are aware of safety issues and policies that affect them and take preventive measures to avoid potential injury.

## WORKING WITH OTHERS

**Antitrust and competition:** Travelport business activities are subject to antitrust and competition laws in most countries around the world. These laws are intended to promote fair competition and free enterprise by prohibiting activities that unreasonably restrain or inhibit competition, “bring about a monopoly” (in the U.S.), “abuse a dominant market position” (in the European Union “EU”), artificially maintain pricing or otherwise illegally hamper or distort normal commerce.

All business partners are expected to carry on business in accordance with all applicable antitrust and competition laws.

As an example, these laws specifically prohibit or restrict agreements between competitors to:

- Fix, coordinate or control prices.
- Allocate or divide up customers or territories.
- Refrain from competing against other market participants wholly, or in some limited fashion.

The antitrust and competition laws also prohibit or restrict implementing certain group boycotts and establishing tying arrangements. Unlawful tying may occur when the purchase of one product or service requires the purchase of another “tied” product or service.

**Competitive intelligence:** Where a business partner is providing competitive intelligence it is permissible to lawfully gather and use information gained about the activities of Travelport competitors. However, it is Travelport’s standing mandate that, without exception, such information must only be obtained by a business partner through lawful and ethical practices.

**Fair dealing:** Each business partner shall deal fairly with Travelport and its customers, suppliers, commercial partners and employees. No one should take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair business practice. This includes the improper use of confidential, proprietary or trade secrets of others, such as, suppliers, customers and former employers, whether protected by law or agreement.

**Conflicts of interest:** Business partners shall disclose to Travelport any relationship that appears to create a conflict of interest in their business relationship with Travelport.

*Here are additional examples of potential conflicts of interest that would require disclosure:*

- Business partner personnel or immediate family member (including the person’s spouse, parents, children, in-laws and anyone who shares their home) acting as a director, partner, consultant or employee of a firm that provides goods or services to Travelport or is a competitor of Travelport or one of its subsidiaries.
- Ownership by business partner personnel or members of their immediate family of a material financial interest, known to the relevant person, in a firm which is either a competitor of or vendor to Travelport or one of its subsidiaries.

- Using Travelport confidential information in any manner that violates Travelport's confidentiality.

**External communications:** Unless specifically authorized, no business partner is to make any public statements, whether verbal or written, on behalf of Travelport, or those that may be construed to be on behalf of Travelport, unless otherwise expressly authorized in writing by Travelport. Business partners are not authorized to provide any response to an inquiry about Travelport, its brands or its businesses including, but not limited to, media interviews, commentary to analysts, writing newspaper or magazine articles, expressing viewpoints related to competitor initiatives, forward-looking information, company strategy, proposed legislation or government regulations, or speculation about Travelport's financial condition, as well as any other external sources seeking information about Travelport. Any business partner personnel who receives an inquiry about Travelport from the media or from an industry or financial analyst should promptly and politely refer the inquiry, without offering comment, to Travelport. Business partner personnel must be careful not to disclose Travelport confidential, personal or business information through public or casual discussions, to the media or others.

**Corruption and bribery:** Business partners shall ensure that all Travelport invoices raised are for legitimate business purposes only. Under no circumstance is it acceptable to seek, offer, give, solicit or receive any form of bribe or kickback.

The laws of virtually all countries in which business partners operate, as well as extra-territorial laws, such as the United States (US) Foreign Corrupt Practices Act and the United Kingdom (UK) Bribery Act, prohibit bribes to governments and other officials (such as political candidates, political parties and their officials, employees of government-owned business, United Nations officials and individuals, etc.). A violation is a serious criminal offense for both companies and individuals, which can result in fines and imprisonment for individuals.

**Marketing, advertising and promotions:** Business partners shall carry out any marketing, advertising or promotional activities in a fair, truthful and ethical manner.

## PRIVACY

**Privacy and personal information:** A growing number of countries are more stringently regulating the collection and use of consumers' personal data such as name, home and office contact information, and other data. Any information that by itself, or as part of a combination of information, identifies an individual (sometimes referred to as personally identifiable information or PII) is of concern under these privacy and data protection laws. In addition, many countries regulate personal data of company representatives in business-to-business transactions. A few countries even regulate the privacy of information relating to corporations. Travelport is committed to handling personal data responsibly and in compliance with applicable privacy laws and data protection laws and expects all business partners to meet the same standards.

In the course of your dealings with Travelport, business partner personnel may come into possession of personal data relating to Travelport employees, customers, vendors or service providers. Personal data must be restricted and protected from discovery by unauthorized parties through appropriate security measures, which may include encryption or similar encoding processes for personal data captured in electronic form. Business partner personnel are not permitted to store personal data on laptops, mobile drives or the hard drive of their computers, or leave personal data available in and around their workstations, but instead should access it only through a secure site, or otherwise keep such information in a locked drawer, office or storage area and only for so long as is necessary for the purposes in which the data was originally obtained.

In the event personal data is inadvertently disclosed, the business partner must immediately notify Travelport.

**Travelport employee confidentiality:** Travelport believes in respecting the confidentiality of our employees' personal information. This means that any business partner access to personal records should be limited to business partner personnel whose function and responsibility specifically include the handling of such personal data and who have a clear business need for that information. Business partner personnel who have access to Travelport personal employee information, including compensation information about employees, must treat it appropriately and confidentially.

## INSIDER TRADING AND NON-PUBLIC INFORMATION

Business partner personnel may, in the course of performing their duties, come into possession of "material non-public information" about Travelport or its subsidiaries or other companies with whom Travelport does business. "Material non-public information" is defined as any information that a reasonable investor would consider important in making a decision to buy or sell securities. In short, it includes any information that could be expected to affect the price of securities, either positively or negatively. Buying or selling securities based on such information is referred to as "insider trading" and can result in substantial fines and imprisonment.

It is illegal for business partner personnel to directly or indirectly buy or sell stocks (shares) or bonds based on insider information or to discuss such information with others who might buy or sell such securities, including shares or bonds.

For example, if in the course of your work and prior to a public announcement, you become aware of an acquisition, divestiture, material contract, or a major change in management that would materially affect Travelport or one of its subsidiaries or another company, you may be guilty of insider trading if you bought or sold securities of Travelport or some other company based on this knowledge or passed this information to anyone who then bought or sold such securities.

**Money laundering or illicit financing:** Business partner shall implement appropriate internal procedures to actively guard against possible money laundering or illicit financing activity.

**Trade sanctions:** Business partners must observe and comply with the laws and regulations governing activities in the various regions and countries where we conduct business. Those laws include trade sanction regulations implemented by the U.S., EU, and United Nations.

**Intellectual property of Travelport:** Travelport is committed to protecting its brands and other intellectual property. This means that all business partners shall safeguard the intellectual property of Travelport, such as trademarks, service marks, patents, copyrights, and trade secrets. All such information, products and inventions, whether or not they are subject to a copyright, patent, trade secret or other rights, are the sole property of Travelport.

**Intellectual property of others:** Business partners shall not reproduce, distribute or alter copyrighted materials without permission of the copyright owner or its authorized agents. Software used in connection with Travelport business must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement. The unauthorized reproduction, distribution or use of copyrighted materials, including software, can result in severe civil and criminal penalties and is strictly prohibited.

**Use of information assets:** Travelport information assets are to be used by a business partner solely in accordance with the terms of the business relationship with Travelport.

These Travelport systems and the data that reside on them are the property of Travelport. Subject to applicable law, any business partner users should not have any expectations of personal privacy with respect to their use of Travelport equipment or systems, the data residing on them, or any electronic

communications transmitted through them. To the extent permitted by law, records of your electronic communications may be made and used for a variety of reasons, including monitoring these communications to verify that company policies are being followed. Keep this in mind and exercise care when using Travelport technology and communication systems.

Business partners may not use, whether inadvertently or intentionally, Travelport information technology or communication systems to:

- Allow others to gain access to Travelport's information technology or communication systems through the use of your password or other security codes.
- Access files, data, or systems to which express authorization from the owner, whether Travelport or another company, has not been obtained.
- Remove, install or modify any Travelport-installed software or programs without authorization.
- Send copyrighted documents not authorized for reproduction.
- Attempt to circumvent or subvert system or network security measures.
- View network traffic for any reason (unless required by your position).
- Send or promote the distribution of unsolicited and unnecessary "junk mail" (e.g., chain letters, advertisements or other communications that represent a waste of time or computer resources for Travelport or others).
- Access the Internet for inappropriate use such as pornography or personal entertainment.
- Send harassing, threatening or obscene messages.
- Engage in any non-Travelport-related business activity.
- Engage in illegal activity or any other activity contrary to Travelport policy.

Business partners must take all necessary measures to secure any Travelport Information including any passwords. If you have any reason to believe that your password or the security of a Travelport information asset has in any manner been compromised, you must immediately report the incident to Travelport.

## COMPANY BUSINESS INFORMATION AND RECORDS

**Confidential and proprietary information:** In the course of the business relationship between business partner and Travelport, business partner and its personnel may be exposed to information considered confidential by Travelport, or may be involved in the design, development or maintenance of products, procedures or inventions related to Travelport's business. All such information, products and inventions, whether or not they are subject to a copyright, patent, trade secret or other rights, are the sole property of Travelport. The business partner shall ensure that its personnel shall not disclose confidential information to any third party, including business colleagues, friends or family members, except for reasons strictly related to the performance of their authorized duties, and should share such information only with others who have a "need to know."

Confidential information includes, but is not limited to:

- Proposed or advance product plans.
- Projected earnings, important management or organizational changes, information about mergers or acquisitions and any other information related to the foregoing.
- Product or service design and development or training.

- Computer software and systems developed by, or for, unique to, Travelport's business.
- Client lists (including phone numbers, addresses and email addresses) or client contact information.
- Personal, financial or compensation information pertaining to any employee of Travelport.
- Advertising or marketing plans, cost structures, pricing plans and strategies.

Business partner and its personnel are responsible and accountable for safeguarding Travelport documents and information to which they have direct or indirect access as a result of the business relationship with Travelport. This duty includes the responsibility to protect sensitive or confidential Travelport documents from unwanted disclosure.

**Financial reporting and records:** A Financial Statement (or financial report) is a formal record of the financial activities of a business. The objective of financial statements is to provide information about the financial position, performance and changes in financial position of an enterprise that is useful to a wide range of users in making economic decisions. Financial statements are legally required to be audited from time to time and there are legal obligations that govern how financial statements are prepared and financial transactions declared. The business partner must maintain an adequate system of internal controls over all areas for financial statements for which they are responsible.

Integrity Line: +1 855 224 4258 or contact <https://iwf.tnwgrc.com/travelport>