

BUSINESS PARTNER CODE OF CONDUCT

1. INTRODUCTION

- 1.1 Changi Travel Services (CTS) Pte Ltd ("**CTS**", the "**Company**" or "**we**") is committed to conducting our businesses and operations with the highest standards of ethics and integrity, and expects that the business partners that we contract with, including but not limited to our distributors, resellers, suppliers, vendors, contractors, sub-contractors, solution and consulting partners and service providers (collectively, "**Business Partners**"), do likewise.
- 1.2 We recognise that, while our Business Partners are independent parties, their business conduct and actions have the potential to reflect on CTS. It is therefore our expectation that all Business Partners and all its employees, subcontractors, agents and other representatives who act on behalf of the Business Partners (collectively, "**Representatives**") adhere to the standards of conduct set out in this CTS Business Partners Code of Conduct (the "**Code**").
- 1.3 All Business Partners shall comply with this Code and shall also ensure that their relevant Representatives understand and adhere to this Code. A failure by any Business Partner or its Representative to comply with the Code can result in CTS terminating the contract with the Business Partner, disclosure of any legal violation to the appropriate government or regulatory authority, and/or the pursuit of any remedy available to the Company.
- 1.4 This Code does not represent a complete set of the Business Partners' obligations and requirements in respect of the Company. All Business Partners must comply with all applicable laws and regulations, this Code and the Business Partners' respective contractual obligations in relation to CTS.
- 1.5 The Code does not create any binding obligation on the Company and we reserve the right to amend the Code from time to time.

2. LAWS AND REGULATIONS

Business Partners undertake to comply with all applicable laws and regulations in the countries that they operate in, and where they provide goods and services to CTS. These include, but are not limited to, labor and employment laws. Business Partners must ensure that their businesses are conducted in accordance with applicable laws and regulations, that their financial and business records are correctly and accurately maintained, and that fair competition is practised.

3. ETHICAL DEALINGS

- 3.1 Business Partners shall ensure that all their business dealings are conducted with integrity, honesty and transparency. Accordingly, CTS does not tolerate, and no Business Partners shall engage in, any form of fraud, corruption, bribery, cheating, extortion, embezzlement or other improper behavior.
- 3.2 Business Partners shall never directly or indirectly give, promise or offer any gratification, inducement or reward to any of CTS's directors, officers, employees or representatives to induce, obtain or retain an improper or unfair business advantage, or otherwise improperly influence decision-making.

- 3.3 Business Partners have an on-going obligation to promptly disclose any actual or potential conflict of interest between a Business Partner and CTS or between any Representative and CTS. For example, if a Business Partner's employee is a family relation (e.g. spouse, children, parent, sibling) to an employee of CTS, or if a Business Partners has any other relationship with an employee of CTS that might represent a conflict of interest, the Business Partner should promptly disclose the fact to CTS. If any Business Partner has any doubt as to whether a conflict of interest has arisen or may arise, the Business Partner must nevertheless disclose the necessary facts to the Company.
- 3.4 From time to time, Business Partners that have been identified by CTS shall, when requested, promptly furnish a certification in the form set out in Appendix A to this Code and provide information that the Company requests in connection with its periodic revalidation of Business Partner business relationship with the Company.

4. HEALTH AND SAFETY

- 4.1 The Company is committed to the responsible management of safety and health risks, in line with widely accepted international and national standards. Accordingly, the Company has implemented an effective and robust safety management system that ensures compliance with safety regulatory requirements. Business Partners and their Representatives must likewise provide a safe and healthy working environment for all their employees.
- 4.2 Business Partners are further encouraged to have in place appropriate policies that are designed to promote the general health of its employees and prevent work-related injuries and illness.
- 4.3 Business Partners shall also ensure that its employees and Representatives are physically fit for work and not under the influence of alcohol, prohibited drugs or other incapacitating substances when providing goods or services to the Company.

5. ENVIRONMENT

- 5.1 Sustainability is a cornerstone of the Company's approach to its operations. As part of its sustainability efforts, key stakeholders are expected to work together with the Company to reduce the environmental impact caused by their operations. Business Partners are expected to comply with all local environmental laws and practices, such as those relating to waste disposal and pollution.
- 5.2 Business Partners should endeavor to minimise the impact of their operations on the environment. They are encouraged to establish environmentally-friendly and sustainable initiatives which are relevant to their respective business and operations.

6. DATA PROTECTION

If in the course of performing its contract with the Company, a Business Partner has access to and/or collects, uses, handles or processes the personal data of any individuals, the Business Partner shall ensure that it complies with the requirements of all applicable personal data protection laws. The Business Partners must not transfer any personal data to a third party without the prior written consent of the Company. All breaches should be reported immediately and transparently to the Company.

7. CONFIDENTIALITY

If a Business Partners receives any information of CTS that is non-public, proprietary and/or potentially commercial sensitive in nature, it shall protect such information against loss, disclosure or infringement. Except for permitted purposes, any form of disclosure or use of such information shall require the prior written consent of the Company.

8. BUSINESS CONTINUITY PLANNING

Business Partners shall have implemented robust plans to mitigate the effects of any business disruptions (e.g. natural disasters, terrorism, strikes, computer viruses, infectious diseases, etc.), in particular, plans to ensure that their employees' well-being and the environment are protected from the negative effects relating to or arising from such business disruptions.

9. RAISING CONCERNS

9.1 Any Business Partner that has reason to believe that a CTS employee, or anyone acting on behalf of CTS, has engaged in illegal or otherwise improper conduct, should promptly report the matter to the Company via the following channels:

- i. By post to 80 Airport Boulevard #04-07/08, Singapore 819642
- ii. By email addressed to whistleblow@changirecommends.com.sg
- iii. By phone at +65 8350 4510
- iv. By Online Submission via CAG website:
<https://forms.office.com/Pages/ResponsePage.aspx?id=NJmMJfoiSECEyMUrRzGHzh6dFWI2c3VHpaVJhJuNjnVUMINIUjJBTVowS0xaUUY1VVY3S1ZDTk9FNy4u>

9.2 All reports made will be treated with confidence. CTS will not tolerate any kind of retaliation against anyone who, in good faith, reports an actual or suspected violation of this Code or any other CTS policy.

10. ASKING QUESTIONS

In case of any questions concerning this Business Partner Code of Conduct, Business Partners should contact CTS's Internal Controls Department at IC@changirecommends.com.sg.

Appendix A - Form of Certification to be made by a Business Partner

Dear _____,

You have been identified as a Business Partner, as defined in Changi Travel Services Pte. Ltd.'s ("CTS") Business Partner Code of Conduct and would be required to complete the certification below.

Please carefully read each of the statements below. If you agree with them, check the boxes next to each statement, and sign and return this certification to [_____]. If you do not agree with any one or more of the statements below, please contact [_____].

To: Changi Travel Services Pte. Ltd. ("CTS" or "the Company")

CERTIFICATION

On behalf of _____ (name of Business Partner), I confirm that:

- We have read and understand the CTS Business Partner Code of Conduct, a copy of which has been extended to us.
- We will comply with the CTS Business Partner Code of Conduct throughout our relationship/engagement with the Company.
- We will promptly report any known or suspected violations of the CTS Business Partner Code of Conduct to CTS.
- We understand that a violation of the CTS Business Partner Code of Conduct may lead to the termination of our business relationship with the Company without compensation.

For and on behalf of Business Partner:

Signature: _____

Name of authorised signatory: _____

Position: _____

(Business Partner) Company: _____

Date: _____