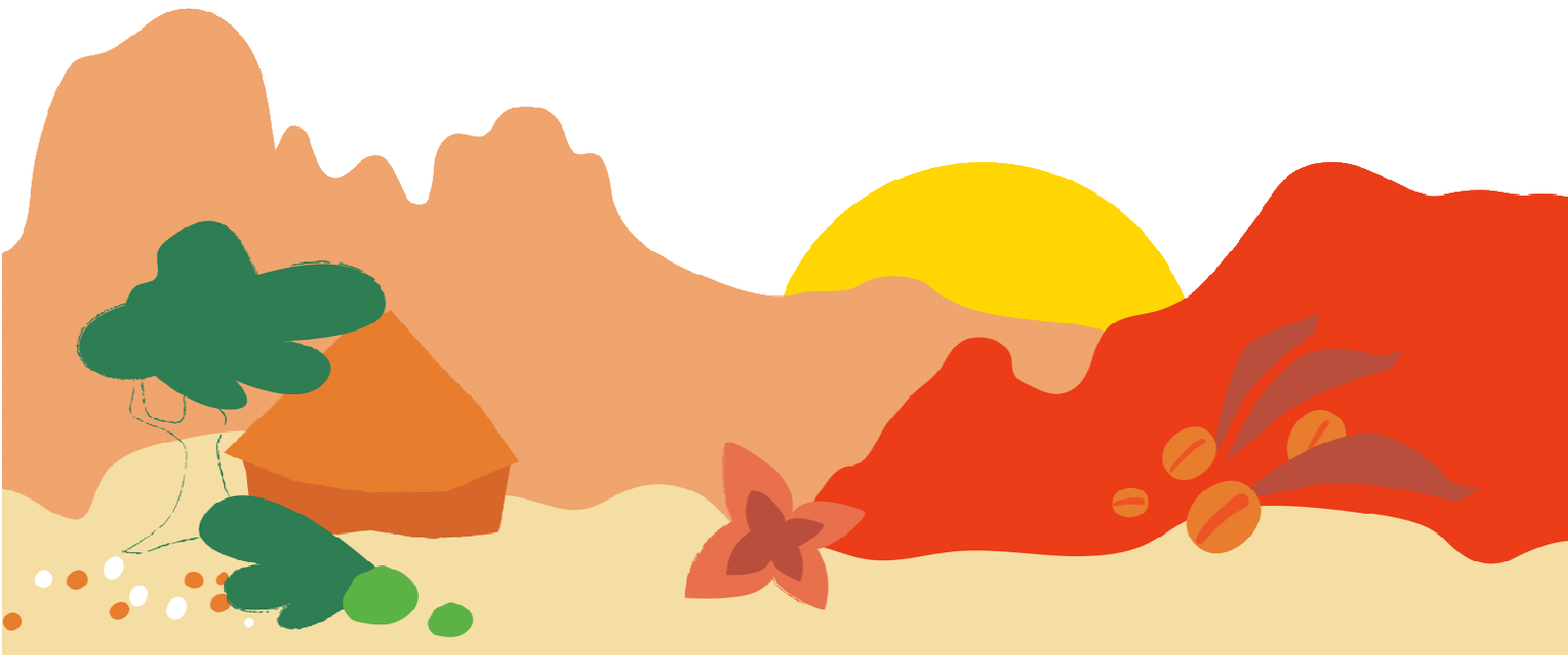




SimienEcoTours

Enjoy Ethiopian Diversity

ETHICAL CODE



Our Ethical Code directs the way SimienEcoTours does business. It guides us at every step to take decisions which are ethical and important for a healthy business.

Our Ethical Code is designed to engage SimienEcoTours in fair relationships with interested parties: customers, competitors, staff, destinations and suppliers.

The code is applicable to all employees including the board of shareholders. It influences our every day decisions.

It is the personal responsibility of every employee to follow and comply with the code. In case of any question or concern, the employee should seek answers from manager or seniors and the managers and seniors should provide answers to such queries and concerns.

RAISING A CONCERN:

If any employee is aware of the violation of the code, she/he should raise it to the relevant authority. All such information will be kept confidential and there will be no retaliation against the employee.

1) CORRUPTION

SimienEcoTours does not allow corrupt arrangements of any form with customers, suppliers, government officials, or other third parties. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

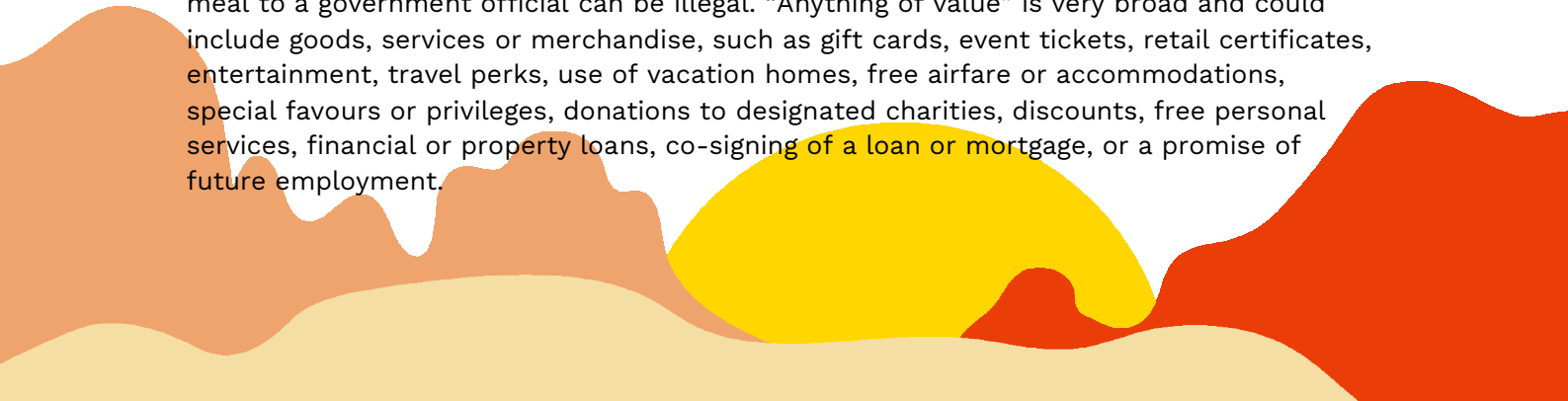
Corruption may involve payments/favours or the exchange of "anything of value" and includes the following activities:

- Bribery
- Extortion
- Kickbacks

Corrupt activities are not only SimienEcoTours' Code violation, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws hence they are strictly prohibited.

2) GIFTS TO GOVERNMENT OFFICIALS

Employees should be aware that giving or offering anything of value, even a simple gift or meal to a government official can be illegal. "Anything of value" is very broad and could include goods, services or merchandise, such as gift cards, event tickets, retail certificates, entertainment, travel perks, use of vacation homes, free airfare or accommodations, special favours or privileges, donations to designated charities, discounts, free personal services, financial or property loans, co-signing of a loan or mortgage, or a promise of future employment.



The company expects its partners to follow SimienEcoTours is anti-corruption policy while dealing with SimienEcoTours and will be made aware of SimienEcoTours Ethics Code through inclusion in the contract.

SimienEcoTours employees are also prohibited from providing, offering or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

Under certain circumstances employees may exchange business gifts that are intended to generate goodwill, provided;

- ✓ The gift has a legitimate business purpose
- ✓ The gift is not cash or a cash equivalent
- ✓ The management is informed
- ✓ The value of the gift remains reasonable (not above 30 USD)

Business hospitality, including meals and entertainment, is not prohibited as long as the nature and frequency of the occasion is reasonable and the occasion involves business.

3) FAIR RELATIONSHIP WITH STAFF

All matters concerning staff rights, duties as well as relations between staff and management are described and collected in Internal Regulations/Employee Manual documents created by each country.

Each staff receives a copy of these Internal Regulations upon joining SimienEcoTours.

4) FAIR RELATIONSHIP WITH COMPETITORS

SimienEcoTours is committed to compete legally and ethically and therefore the following guidelines are being set. SimienEcoTours and all its employees are to refrain from entering into or carrying out anti-competitive agreements among competitors, including agreements to:

- Fix prices;
- Organise rigged bids (collusive tenders);
- Establish output restrictions or quotas; or
- Share or divide markets by allocating customers, suppliers, territories or lines of commerce.

When dealing with competitors, SimienEcoTours should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales, or engage in any other activity that violates applicable antitrust or competition laws.

SimienEcoTours is to respect the confidential information and intellectual property rights of our Competitors and other third parties.

SimienEcoTours supports (upon request) collaborative initiatives with other tour operators to promote sustainability among accommodations in specific destinations. The intention to support such actions is mentioned in the policy.

5) FAIR RELATIONSHIP WITH THE DESTINATION

SimienEcoTours intends to remain apolitical and is committed to provide social and environmental support to the community.

- Supporting local communities: SimienEcoTours intends to include into packages or promote to clients excursions and activities which directly involve and support local communities (by purchasing services or goods, traditional crafts and local (food) production methods, visiting social projects).
- Support biodiversity conservation: SimienEcoTours supports biodiversity conservation, including protected areas and areas of high biodiversity, through for example financial contribution, supporting actions and integration in product offers.
- Sustainable destinations: Sustainability aspects in destinations are considered in the selection process of new destinations (e.g. traffic-free areas, sustainable city planning, proper waste management infrastructure and community participation). Possibly alternative non-mainstream destinations are offered.

6) FAIR RELATIONSHIP WITH SUPPLIERS

SimienEcoTours holds suppliers to the same standards of integrity to which we hold ourselves. All suppliers are informed of our Ethical Code when entering a business relation with us. Our suppliers include any third-party vendor, consultant, travel agent, travel agency or service provider.

- Selection of Supplier: The selection of suppliers is based on merit, quality of service and reputation. Asking for a commission from a supplier/ guides for being selected and used is considered as corruption and is prohibited.
- Preferred status: Accommodations and excursions/ activity suppliers which engage actively in sustainability as validated by the SimienEcoTours acting as independent third party will be highlighted to agents in our communication and marketing efforts. SimienEcoTours will provide advice to suppliers to assess their sustainability level.
- Employment conditions: The business ensures that tour leaders, representatives, guides and other locally active staff, contracted on temporary assignment basis by the company, understand the terms and conditions of their employment including remuneration. The contracts are all in the local language or bilingual (when requested) and mention the wages and other forms of remuneration.

- Living wage: Tour leaders, local representatives, guides and other local staff, contracted by the company, are paid a living wage that is equal to or above the legal minimum applicable for the relevant destination/area.

7) FAIR RELATIONSHIP WITH CUSTOMERS

Integrity requires each of us to treat our customers ethically, fairly and in compliance with all applicable laws. We should always earn the business of the customers on customer service and competitive prices.

- Customer privacy: In our operations we respect customer privacy and take reasonable measures to ensure the security of personal data collected, stored, processed or disseminated. The company ensures that customer privacy is not compromised.
- Marketing and advertising messages: Marketing and advertising messages comply with relevant standards and voluntary codes of conduct and are not misleading. SimienEcoTours however makes all possible efforts to deliver more than is promised to client.
- Product information: We present our services and products in an honest and forthright manner;
 1. Product and price information is clear, complete and accurate with regard to the company and its products and services, including sustainability claims.
 2. Destination information, including sustainability aspects, is factually correct, balanced and complete.
- GHG / Carbon compensation information: Clients are informed about the possibilities for GHG or carbon reduction/compensation for the international transport in the package tour.
- Indication of sustainable accommodation and excursions: Sustainable accommodations, excursions, packages and/or transport options are promoted with logos or other messages. They are recognisable to customer/consumer and presented as the “better” option.
- Travel advise with sustainable offers: In the frame of personal travel advise, the customer is informed about sustainable alternatives concerning accommodations, excursions, package holidays and transport options, if available.
- Sustainability commitment: Consumers are clearly informed about the participation and/or certification of the company by Travelife and the related sustainability commitments and actions. Unless their Travel agents had refused in writing, consumers are informed of the best practices and sustainability issues in one destination in particular via the SimienEcoTours Sustainable Travel booklet.
- Feedback: Consumers are provided the possibility to share their opinion on specific situations which may have hurt their feelings or general ethics and sustainability principles via the satisfaction survey provided to them.