

BUSINESS PARTNER CODE OF CONDUCT

1. Overview and Purpose

- 1.1 The Business Partner Code of Conduct (the "Code") details the minimum expectations of Serko Limited and its affiliates' (together "Serko") regarding business ethics, employment conditions, working environment, environment and sustainability and respect for all (the "Serko Business Principles") for Serko, and for all third parties Serko does business with. We care about how we do business and the relationships we form, and as such, we believe that the Serko Business Principles are key to the success of those relationships. References to "Us", "Our" and "We" in the Code mean Serko.
- 1.2 The Code applies to all third parties who:
- (a) provide goods or services to Serko ("Suppliers") and includes a Supplier's employees, agents and subcontractors (and supply chain); and
 - (b) are provided with access to the Serko Software and services from Serko ("Customers");
- (together "Business Partners").
- 1.3 Serko is committed to ensuring it upholds high standards of business ethics, integrity and honesty. We also expect our Business Partners to do the same.
- 1.4 The Code covers the following areas:
- Business Ethics
 - Employment conditions
 - Working Environment
 - Environment and Sustainability
 - Respect for all

2. Business Ethics

We expect our Business Partners to manage risk, governance and compliance appropriately, to act with high standards of honesty and integrity at all times and to comply with all applicable laws and regulations. We also expect our Business Partners to:

Bribery and Corruption

- Never offer or make improper or illegal payments to the government, political parties, or candidates for public office.
- Never offer or receive any illegal payments from customers, suppliers, representatives, or others.

Sanctions

- Not deal with any person or entity included on a recognised sanctions list.
- Not operate in a country that is the target of economic sanctions or trade restrictions imposed by significant trading blocs.
- Not use Serko Software to arrange travel, manage expenses, or otherwise for the benefit of any person or entity that is the subject of sanctions.

- Will require any person or entity they provide with access to the Serko Software to give undertakings equivalent to those in statements above.
- Will immediately inform Serko of any proposed use or transfer of Serko software that would involve any person or entity, or any country or territory, that is, or whose government is, the subject of Sanctions.

Money Laundering and Terrorism Financing

- Not engage in money laundering or terrorism financing activities.
- Actively seek to stop money laundering and terrorism financing through policy and robust processes.
- Follow all relevant AML and CFT laws and regulations.

3. Employment Conditions

Serko treats all employees with respect, and fair employment practices in accordance with the law, human rights, and health and safety obligations. We expect our business partners to provide the same to their employees. As such, we expect our business partners and all that we contract with to meet the following:

Child Labour and Modern Slavery

- Not use child labour in any part of its business and ensure employees meet the local legal age of employment.
- Only engage employees to work on a voluntary basis and never have employees do work under threat or penalty of any kind.
- Not engage in serious exploitation behaviour where coercion, threats or deception is used to exploit victims and undermine their freedom.
- Not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude, (whether adults or children).

Health, Safety and Wellbeing

- Follow all relevant health and safety laws and regulations.
- Have procedures and protocols in place that prevent any form of harm to employees.
- Have a programme in place that encourages continuous improvement.
- Strive to maintain an environment that fosters work life balance and flexible working where relevant.

Remuneration

- Compensate employees the legal minimum compensation required by local law.
- Not make any deductions from wages that are illegal or unauthorised.

Learning Opportunities

- Provide employees with necessary training and learning opportunities required for employees to carry out their duties, particularly in relation to safety, privacy and IT security.

4. Working Environment

Serko believes in promoting a working environment free from discrimination, harassment and victimisation. It also believes in promoting workplace diversity and gender equity. As such, we expect our business partners should:

Harassment

- Treat all employees with respect and dignity.
- Maintain a workplace free from physical, psychological, and verbal harassment.
- Have zero tolerance for victimisation and bullying.

Non-Discrimination

- Provide equal opportunity for all employees and applicants in terms of recruitment, compensation, promotion, and termination.
- Not discriminate on the basis of gender, marital status, religion, ethical belief, colour, race, ethnicity, nationality, disability, age, political affiliation or sexual orientation.
- Have appropriate policies and process in place that actively seek to support employees.

5. Environment and Sustainability

Serko is actively making efforts to minimise environmental impacts of our business operations. We expect the businesses we work with to do the same, and as such, expect our business partners to:

Environmental Laws and Regulations

- Comply with all environmental laws, regulations and policies.
- Maintain all required permits, approvals, and environmental registrations.
- Act responsibly and take reasonable steps to prevent and/or remediate any significant environmental harm.
- Continuously work to improve environmental sustainability and reduce environmental impacts.

6. Respect for all

Respect is an essential element in any business relationship. Serko are committed to demonstrating the following in all interactions with our business partners and therefore expect the same in return.

- Communication: Maintaining open and honest communication is essential in any business relationship. Responding to emails and phone calls in a timely manner, actively listening to the other party, and keeping them informed about changes or updates that may affect them are all important ways to show respect.
- Fairness: Treating suppliers and customers fairly and equitably is crucial to building trust and fostering long-term relationships.
- Professionalism: Demonstrating professionalism in all interactions is essential for building a positive reputation and maintaining good relationships.
- Empathy: Taking the time to understand the needs and perspectives of all involved can go a long way in demonstrating respect.
- Feedback: Providing feedback can help build stronger relationships and help with continuous product/service improvement.