



CODE OF ETHICS

JUMBO

1. INTRODUCTION

JUMBO aspires to maintain and develop a relationship of trust with its stakeholders, meaning those categories of individuals, groups, or institutions whose contribution is necessary to carry out its mission: designing trips for people to discover the infinite possibilities of the world.

In a broad sense, all individual groups, as well as the organizations and institutions representing them, whose interests are influenced by the direct and indirect effects of Jumbo's activity, are considered stakeholders. This definition includes shareholders, collaborators, clients, suppliers, and commercial partners.

2. PURPOSE AND SCOPE

The Code of Ethics establishes principles for the responsible behavior of its employees, managers, and collaborators, regardless of their geographical location. It is the obligation of all persons affected by the scope of this code to respect its content, promote its development, and report any behavior (or indication thereof) that may go against its purpose.

Likewise, other interest groups (clients, suppliers, commercial partners, etc.) will be authorized to submit appeals in case of code violations, addressing their queries first to their superior or, if necessary, to the Supervisory Body.

3. PRINCIPLES OF ACTION

The development of our activities will be carried out considering our core values:

- **Total Integrity:** We act with transparency and honesty, rejecting any form of corruption.
- **Global Humanism:** We respect the dignity of every person, valuing diversity as a driver of innovation.
- **Real Sustainability:** We minimize our environmental footprint and maximize our positive social impact.
- **Responsible Excellence:** We seek economic success without compromising our ethical principles.

4. STANDARDS OF PROFESSIONAL CONDUCT

The actions of all individuals who carry out their professional activity on behalf of Jumbo will be governed by the standards developed below:

A. Market Integrity and Fight Against Corruption:

The Company maintains a Zero Tolerance policy toward any practice that may be interpreted as corruption or lack of integrity. Our competitive advantage is based exclusively on the quality of our services and the talent of our team.

A1. Corruption and Bribery

Any form of corruption is strictly prohibited, both in the public and private sectors.

- **Active Bribery:** It is forbidden to offer, promise, or grant money, benefits, or unjustified advantages to any person (especially public officials or employees of other companies) to obtain preferential treatment.
- **Passive Bribery:** No employee may solicit or accept unauthorized benefits intended to influence their professional decisions on behalf of the Company.
- **Note:** “Benefit” is considered not only money but also promises of employment, loans on preferential terms, or privileged information.

A.2. Donations to Political Parties

The Company maintains a position of strict political neutrality in all countries where it operates.

- It is prohibited to make economic donations, in-kind contributions, or sponsorships to political parties, federations, coalitions, or electoral groups, as well as their associated foundations, even in countries where local law permits it.
- Any lobbying activity or relationship with public representatives will be carried out under the principles of transparency and official registration where required, with prior authorization from the Compliance Committee.



A.3. Facilitation Payments

Facilitation payments are small amounts of money given to public officials to expedite routine administrative procedures (licenses, customs, visas).

- **Absolute Prohibition:** The Company expressly prohibits these payments worldwide, regardless of whether they are considered “local custom” or “necessary” to operate.
- In the event that an employee is coerced under a real threat to their physical integrity to make a payment, they must prioritize their safety, make the payment, and report it immediately to the ethical channel for legal management.

A.4. Gifts, Favors, and Hospitality

To avoid conflicts of interest or the appearance of impropriety, employees must follow these rules:

- **Symbolic Value:** Only gifts or hospitality that have a symbolic or reasonable commercial value and are customary according to social uses are permitted.
- **Prohibition of Cash:** Never shall cash, gift cards, or assets easily convertible into money be accepted or given.
- **Transparency Register:** Any hospitality that exceeds the economic threshold set in the Company’s Expense Policy (or generally, €100 or local equivalent) must be declared and authorized by a superior.
- **Sensitive Moments:** No exchange of gifts is permitted during bidding processes, contract negotiations, or official inspections.

A.5. Prevention of Money Laundering and Irregularities

We are committed to financial transparency and the fight against organized crime.

- **Partner Knowledge:** Before initiating commercial relationships, integrity verifications of clients and suppliers are carried out to ensure they are not involved in illicit activities.
- **Payment Irregularities:** Payments of unknown origin will not be accepted, nor will payments be made to accounts in tax havens or to entities that are not the legitimate contract holders, unless expressly and documented authorized by the financial area.
- **Tax Compliance:** The Company commits to responsibly declare its profits and pay its taxes in each country, avoiding any artificial structure aimed at tax evasion

B. Human and Labor Right

As an organization with international presence, we assume the unwavering commitment to strictly comply with the labor, tax, and social security regulations in force in each of the countries and jurisdictions where we operate.

All our operations will be carried out based on the “Golden Rule”: No commercial goal or operational urgency justifies non-compliance with local labor regulations or the detriment of workers' rights abroad .

To guarantee this commitment, we apply the following criteria:

- **Primacy of Local Legality:** All our subsidiaries and workplaces must ensure that contracts, working hours, wages, rest periods, and social benefits faithfully adhere to the national and regional legislation of each country.
- **Superior Protection Standard (Favourability Criterion):** In territories where local legislation is less demanding than international standards or the values of our parent company in Spain, the Company will voluntarily strive to apply the Fundamental Conventions of the International Labour Organization (ILO) and the best practices of the European Union, always ensuring the option that is most favorable to the worker's dignity and safety.
- **Human Rights and Decent Work:** We reject and strictly prohibit, in all our global operations and supply chains, any form of forced, child, or coerced labor, complying with the Due Diligence Law and the most rigorous human rights standards.
- **Occupational Health and Safety:** We will implement risk prevention protocols in each country necessary to exceed local legal minimums, ensuring a safe and healthy work environment for all our collaborators, regardless of their geographical location.
- **Relationship with Authorities:** We will maintain an attitude of collaboration and total transparency with labor inspections and competent authorities in each country, providing all the information required to demonstrate compliance with our obligations.

C. Digital Ethics and Privacy

In an interconnected global environment, information is our most sensitive asset.

- **Data Protection (GDPR):** We will apply the standards of the EU General Data Protection Regulation in all our global headquarters.
- **Responsible AI:** Every algorithm or AI system used will be transparent, explainable, and reviewed to avoid discriminatory biases



5. COMMITMENT TO THE PLANET AND SOCIETY

Our economic activity is inseparable from the well-being of people and the health of ecosystems. As a global company, we assume the responsibility of being a driver of positive change, applying the principle of “think globally, act locally.”

A. Environmental Protection and Regeneration

The Company is committed to leading the transition toward a decarbonized and circular economy, going beyond mere regulatory compliance.

- Towards “Net Zero”: We will implement strategies for reducing greenhouse gas emissions in all our operations, prioritizing energy efficiency and the use of renewable sources.
- Circular Economy and Waste: We minimize the use of virgin raw materials and will progressively eliminate single-use plastics. All generated waste must be treated as a potential resource under recycling or reuse models.
- Water Management and Biodiversity: We recognize water as a scarce and vital resource. In countries with water stress, we will apply extreme saving protocols. Likewise, we commit to ensuring that our infrastructures or projects respect local ecosystems, avoiding any negative impact on protected biodiversity.

B. Promotion of Local Development and Shared Value

Our presence in a territory must translate into prosperity for its inhabitants. We are not “corporate islands,” but part of the social fabric.

- **Promotion of Local Talent:** We will prioritize the hiring of professionals residing in the areas where we operate, offering training plans that improve the community’s employability.
- **Local Suppliers (Global KM 0):** Whenever technically and economically viable, we will prioritize the hiring of local suppliers and SMEs. We want our supply chain to strengthen regional economies.
- **Strategic Social Investment:** We will collaborate on community development projects (education, health, basic infrastructures) that respond to the real needs detected by the community itself, avoiding welfarism and seeking long-term sustainable solutions.

C. Sensitivity and Respect for Cultural Diversity

Operating in different countries requires deep cultural humility from us. We respect the identity of each people as a non-negotiable asset.

- **Protección del Patrimonio y Costumbres: Protection of Heritage and Customs:** The Company commits to respecting places of cultural, religious, or historical importance, as well as the traditions of local communities and indigenous peoples.
- **Adaptation and Dialogue:** Before initiating operations in culturally sensitive environments, we will establish mechanisms for dialogue with community representatives to ensure that our activity does not alter their way of life or violate their essential values.
- **Inclusive Communication:** We adapt our commercial and corporate communication to be respectful of the language, uses, and aesthetic sensitivity of each culture, avoiding any form of stereotype or Eurocentric cultural imposition.



6. THE ETHICAL CHANNEL (COMPLIANCE)

To ensure that this code is not just paper, the company has a Reporting Channel that operates under the following premises:

1. **Confidential Reporting:** Any non-compliance can be reported anonymously through the corporate web platform.
2. **Prohibition of Retaliation:** We guarantee that no whistleblower, regardless of their status, will suffer negative consequences for reporting a potential irregularity in good faith.
3. **Objective Investigation:** All reports will be managed by an independent Compliance Committee within a maximum period of 90 days.

7. SANCTION REGIME

Non-compliance with this Code of Ethics may lead to disciplinary sanctions in accordance with the applicable labor legislation in each country, which may include dismissal or the termination of commercial contracts in the case of suppliers.

Jumbo

ALPITOURWORLD

Thank you



GLOBAL CODE OF ETHICS AND CONDUCT

PRESENTATION LETTER

Our reputation is not built on what we say, but on how we act in every market, every office, and every interaction. This code is the commitment that our essence—supportive, creative, and resilient—translates into global integrity.”

Emilio Rivas Boyero
DIRECCIÓN GENERAL

A handwritten signature in blue ink, consisting of a large, stylized 'E' with a circular flourish at the top and a horizontal line at the bottom.