



CODE OF CONDUCT

INTRODUCTION

WELL'COM Policy Statement outlines the rules to be followed by all employees as they go about their work. It is based on the following six core principles:

- acting responsibly and compassionately
- respecting and promoting integrity in the conduct of business
- offering a fulfilling work environment and valuing talent
- winning the trust of partners
- winning the trust of customers
- committing to protect the environment

The success of Well'com also depends on respect for the shared rules, practices and principles that guide the day-to-day conduct of our business activities everywhere in the world in terms of ethics, social responsibility and respect for the environment.

We must ensure compliance with all applicable treaties, laws and regulations, particularly in the areas of human rights and basic freedoms, health and safety, environment and ethics.

We ensure to respect national and international laws, regulations and decisions and the application of best practices – particularly with respect to ethics, the environment and social responsibility – are essential prerequisites for the credibility of our policy.

Well'com is committed to respecting both the letter and the spirit of these key texts and to translating its values and principles into responsible behavior.

This Code of Conduct is inspired by the fundamental values detailed above, as well as the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guidelines on Women's Empowerment.

We make these commitments to ourselves, to our employees, to our stakeholders and to our contractual partners.

1. ABOUT WELL'COM

Well'com (hereinafter referred to as “we”) is in the business of providing premium Services including but not limited to the following: premium hosting, meet & greet services, luxurious hospitality services, premium activities, car rentals (with and without driver service); special and exclusive services hereinafter referred to as the “Services”.



References to Well'com includes (without limitation) Well'com Group, Well'com Air, Well'com Services, L'Exceptionnel by Well'com.

2. COMMITMENT OF INTEGRITY IN THE CONDUCT OF BUSINESS

- **Fighting against corruption**

Well'com applies a zero-tolerance policy concerning corruption and influence peddling and implements measures to prevent, identify and sanction any instances of corruption or influence peddling within the scope of its activities.

Internal guidelines communicated to employees precisely illustrate the types of behaviour that are strictly prohibited and which may be characterized as corruption or influence peddling. For example, they include:

- paying or accepting bribes or hidden commissions, regardless of whether they are paid directly or indirectly;
- facilitating payments (payment of small sums to public officials in order to speed or guarantee the execution of an action as part of the normal conduct of business);

More broadly, any payment to a third party must be in exchange for a service and correspond to a legitimate price agreed with this third party.

- **Preventing and managing conflicts of interest**

Conflicts of interest may arise when the personal interests of an employee or those of third parties (private individuals or companies) with which the employee has a close relationship conflict or could potentially conflict with the interests of Well'com and could compromise or give the appearance that this relationship might compromise the impartial and objective exercise of the employee's responsibilities.

Well'com employees who could potentially find themselves in situations such as this are required to report potential conflicts of interest as soon as they are identified.

In addition to immediately reporting potential conflicts of interest, employees whose positions and responsibilities render them particularly exposed to possible conflicts of interest are required to periodically report the absence of any conflicts of interest or report any potential conflicts of interest that have been identified.

Well'com has established specific internal guidelines designed to avoid and manage conflicts of interest; employees are expected to act in accordance with these guidelines.



- **Protecting confidentiality**

Well'com employees are committed to protecting the confidentiality and integrity of internal information that has not been made public.

This information may in particular concern financial data, information on strategy, employees or clientele, services, pending deals, partners, potential acquisitions or commercial initiatives designed to bring Well'com a competitive advantage.

As a general rule, discretion is essential in order to maintain trust within the Company and within the framework of relationships established with clients and partners.

Well'com is committed to ensuring the protection of all confidential information entrusted to the group by external sources.

Also, Well'com has a strict privacy policy and makes its best efforts to comply with the GDPR requirements. Our privacy policy is regularly updated in order to comply with the legal requirements.

- **Fighting money-laundering**

Money-laundering involves the investment of funds derived from criminal activities in legitimate economic activities to conceal the illegal origin of these funds.

Well'com has established internal guidelines and procedures to fight money-laundering, by limiting cash payments and requires that its employees and partners be especially vigilant in this regard.

Well'com takes appropriate measures designed to avoid its activities being used as a vehicle for money-laundering, an illegal activity that might involve the payments in cash or other bearer instruments.



3. MODERN SLAVERY, FORCED OR UNFAIR LABOUR

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, to requiring our suppliers and partners hold similar ethos.

We undertake to comply with national and international legislation regarding modern slavery and human trafficking.

4. COMMITMENT OF INTEGRITY IN THE CONDUCT OF BUSINESS

Well'com respects and promotes the principles of the United Nations Global Compact, in particular the fundamental rights at work:

- elimination of discrimination with respect to employment and occupation;
- elimination of all forms of forced and compulsory labour;
- effective abolition of child labour;
- freedom of association and the effective recognition of the right to collective bargaining.

Well'com encourages a diversity of profiles and backgrounds. We aim to represent the diversity of the world we live in. Creating a culture of inclusion and belonging is of paramount importance. Every team member should be able to participate actively and be equally accepted as part of the Well'com community.

Well'com is formally committed to ensuring that all employees enjoy their rights irrespective of skin colour, sex, religion, political convictions, national or social origin, age, disability, trade union membership, sexual orientation, or gender identity.

Particular attention is accorded to vulnerable persons' rights.

Well'com is dedicated to building a workplace culture that empowers everyone and ensures that all team members feel safe and respected. Discrimination of any kind has no place at Well'com.

Well'com is committed to guaranteeing a respectful working environment – everyone is expected to participate in this effort. This principle applies to the treatment of every team member, player, community member, and business partner teams interact with during online, at work or work-related events.

Well'com expects all teams to always maintain a professional attitude and a civil tone including when facing tough challenges or when contentious topics are on the table. Incivilities include behaviour such as shouting at someone, pounding the table in frustration and aggressively vulgar language. These and similar behaviours undermine Well'com's culture of mutual respect and work experience of teams.



Well'com gives a particular attention to its employees and their well being and their happiness at work and gives particular attention to:

- **promoting a work environment that respects individuals;**
- **offering a stimulating and motivating work environment for employees;**
- **encouraging a work environment that is safe and which respects private life;**
- **promoting dialogue with employee representatives.**

Well'com commits to a zero-tolerance policy where any team member in violation of this principle, regardless of their position, will be subject to disciplinary action.

We have a shared responsibility to create a work environment where everyone can thrive and give their best. Thus, everyone is to abide by the following principles that inform how we work together:

Well'com strive to act with empathy. We never hesitate to offer a helping hand, knowing that we can also count on the support of others when we need it.

We value each other's unique perspectives and believe that open discussions raise awareness and lead to growth, learning and mutual understanding.

At Well'com, we Are One Team and we each bring our individual talents to achieve our shared mission. Our diverse backgrounds, cultures and experiences fuel our creativity.

5. ACTING RESPONSIBLY AND WITH SOCIAL AWARENESS

Well'com ensures that the conduct of its businesses respects individual rights and encourages the continuous improvement of social and public health conditions, which are essential to the development and protection of individual rights.

Well'com is committed to remaining vigilant in identifying any potential direct or indirect negative impact of its activities on society to prevent, or if necessary, remedy any such negative impact.

Well'com supports its partners to establish and respect good corporate social and environmental practices and encourages their awareness of the importance of these issues. In particular, Well'com requires suppliers to comply with the principles listed in this code of conduct ((prohibition of forced labour and child labour, harassment and discrimination, measures related to wages, working hours, the free exercise of union rights, health and safety), environmental issues and operational issues (notably respect for laws, customs regulations, safety and sub- contracting) and measures to fight corruption and illicit influence).



6. COMMITMENT TO PROTECT THE ENVIRONMENT

Protecting the environment is both an imperative and a source of progress.

In all countries where it has a presence, Well'com strictly complies with applicable environmental laws, regulations and standards.

Well'com is committed to monitoring and continuously reducing its environmental footprint, as well as regularly reporting on the progress of our action plan.

Environmental issues are integrated into Well'com's strategic plan and must be the subject of specific medium- and long-term action plans, accompanied by indicators to monitor their performance.

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