



Supplier Code of Conduct

Wizz Air Group is committed to ensuring that everyone, everywhere can benefit from travel at the lowest prices possible, while simultaneously devoting special attention to environmental, social and economic responsibility during its operations. For the purposes of this Supplier Code of Conduct: Wizz Air or Wizz Air Group shall mean any firm, company, corporation or other organization which is directly or indirectly controlled by Wizz Air Holdings Plc. Wizz Air's strategy is to build on low fares and a diverse network, supported by efficient and sustainable operations. Wizz Air is committed to doing business with suppliers and partners who supply products and/or services to Wizz Air Group (hereinafter: Suppliers) who share Wizz Air's commitments. This Supplier Code of Conduct applies to all Suppliers of Wizz Air as well as their suppliers and sub-contractors.

1. ENVIRONMENTAL SUSTAINABILITY

Wizz Air strives to be the most sustainable choice of air travel and works hard on continuously decreasing its environmental impact. Therefore, Wizz Air conducts business with Suppliers who share this commitment and strive to implement environmentally responsible business practices to improve the overall environmental performance of Wizz Air. In this respect, Wizz Air seeks to engage with Suppliers who:

- Conduct their business in accordance with all applicable environmental laws and regulations, and therefore hold the required environmental permits, licences, and registrations;
- Beyond the fulfilment of legislative environmental requirements, constantly commit to reducing their waste disposal, GHG emissions, air and noise pollution, and to limiting water utilization relevant to their operations;
- Commit to continuously improving their performance on waste selection, to providing products made of recycled materials when appropriate, and decreasing reliance on single use plastic;
- Work with Wizz Air to identify and act on initiatives which will minimise the negative impact of the business on the environment and climate change;
- Assess the impacts and risks of their activities on the environment, the climate and local communities;
- Ensure the rights and interests of local communities when extracting and processing raw materials, even in cases when such rights are not formally registered.

Due to the potential physical threats of climate change in the future, for instance due to more extreme weather events, forecast water and temperature level rise, Suppliers should also consider possible climate change impacts on their operations and improve their resilience to the potential threats.

Suppliers must monitor and record key environmental performance data and when requested, must provide information and data on resource use (e.g. energy consumption) in connection with supplying Wizz Air. Besides activity data, Suppliers may be required to share information on their operation related climate change and environmental protection commitments. Such information and data must be provided in a transparent and reliable way.

2. COMMERCIAL SUSTAINABILITY, CONTINUOUS IMPROVEMENT

Wizz Air believes that the ultra-low-cost carrier (ULCC) model provides the strongest base to build the highest customer value on. The model is about efficiency delivered by:

- A young, efficient, environmentally friendly and standardized fleet;
- Quick turn-arounds at both primary and secondary airports;



- Unbundled, ancillary services, where customers are free to create their bespoke packages based on their individual needs.

Wizz Air's commitment to effectiveness is embedded throughout the entire air transport process, from the operational design to passenger service, and includes every element of our supply chain. Wizz Air invites its Suppliers to embrace the challenge of the ULCC world and enjoy the benefits of the continuous improved effectiveness, resulting in high customer value.

3. ETHICAL BUSINESS/SOCIAL AND LABOR STANDARDS/LEGAL COMPLIANCE

Wizz Air's commitments include complying with applicable laws and voluntarily exceeding legal requirements. For this purpose, compliance with all applicable laws and regulations is of paramount importance for Wizz Air. Ensuring compliance within its organization is a key step on the way to sustainability but in order to achieve the best results, Wizz Air also requires its Suppliers and business partners to meet the following conditions:

- Suppliers' business operations, as well as all products and services supplied to Wizz Air must fully comply with the laws and regulations of the countries both where the Suppliers' operations are based as well as where goods and services are provided to Wizz Air. These include but are not limited to laws relating to air emissions, hazardous materials, waste and wastewater discharge.
- Wizz Air's Suppliers are required to conduct their business activities: i) in full compliance with all competition and fair trading laws including Wizz Air's Anti-Corruption Policy; ii) comply with insider trading and other capital market laws when in possession of information about Wizz Air; iii) maintain all financial and business records accurately in accordance with applicable laws and regulations and generally accepted accounting principles; and iv) comply with any other policies Wizz Air may have (as amended from time to time).
- **HUMAN RIGHTS:** Wizz Air respects human rights of employees and expects the same from Suppliers.
Anti-Discrimination: Suppliers shall not discriminate against any employee based on grounds of race, colour, religion, national or ethnic origin, age, disability, gender, pregnancy or maternity, marital status, sexual orientation, gender identity or expression, political or personal belief. It is expressly understood that upon receipt of evidence of discrimination under any of these categories, Wizz Air will conduct no further business with the Supplier.
Anti-Harassment: Suppliers shall provide a work environment that is free from harassment and bullying of any kind and any other offensive or disrespectful conduct.
- **LABOR STANDARDS**
Modern slavery and human trafficking: Suppliers are required not to use forced labour, including bonded labour, prison labour, and indentured labour; and ii) to conduct work based on freely agreed terms. Suppliers i) should not engage in any form of human trafficking, traffic in prostitution and trafficking for exploitation; and therefore ii) should not confiscate, withhold, destroy and conceal the identity or immigration documents or other official documents of their labour, and iii) must not hold back any part of their workers' salaries to restrict workers' freedom or to create workplace slavery.
Prevention of child labour: Wizz Air expects Suppliers i) to employ only workers who meet the applicable minimum legal age requirement; and ii) to comply with all other applicable child labour laws.
Working hours and wages: Suppliers should set working hours and overtime payment in compliance with applicable laws. Suppliers shall pay employees at least the legal minimum wage according to the local legislation.
Working conditions: Suppliers should provide all employees with a safe and healthy environment and should comply with all applicable laws and regulations regarding working conditions.
Freedom of association: Suppliers should freely allow their employees to associate with others, form and join organizations of their choice, and bargain collectively. Suppliers should ensure



that their employees have the means to report grievances and mechanisms to facilitate open communication between management and employees.

- **FAIR BUSINESS CONDUCT**

Conflict of Interest: A financial or any other relationship between a Supplier and a Wizz Air employee (or a family member or a person in close relationship to a Wizz Air employee) that could involve a financial benefit or other personal or competing interest may create an actual, potential or perceived conflict of interest for Wizz Air and/or a Supplier. A conflict of interest arises when the personal interests of the Wizz Air employees and the Supplier (or its employees or agents) are inconsistent with their responsibilities to Wizz Air or the Supplier company. All such conflicts must be disclosed and approved or corrected. Even the appearance of a conflict of interest may be damaging to Wizz Air and to the Supplier, and it must be disclosed and approved in advance by Wizz Air.

4. HEALTH AND SAFETY

Wizz Air is firmly committed to the provision of a safe and healthy workplace for employees and supports an alcohol and drug free work environment, which shall be followed by Suppliers as well. Suppliers shall have a Health and Safety policy and management system in place to ensure that the employer complies with the relevant occupational health and safety legislation.

5. SECURITY, SAFETY & COMPLIANCE

Suppliers shall establish, maintain, improve and promote a Safety Management System within the organization. Identified hazards shall be assessed and the associated risks shall be mitigated to the lowest practical level. Suppliers shall create and maintain an open and honest environment and encourage employees and sub-contractors to report mistakes, errors and potential hazards. These reports shall be shared with Wizz Air in order to minimize the safety risk and prevent occurrence of incidents and accidents.

Suppliers shall establish and maintain a Compliance Monitoring System within the organization, in order to ensure that rules, regulations and contractually agreed terms are complied with. Non-conformities and findings shall be actioned in a timely manner to correct non-conformities and prevent reoccurrence. Quality escapes shall be reported immediately to Wizz Air, in order to prevent occurrence of incidents and minimize potential financial losses.

Human errors and mistakes shall be treated fairly, but intentional misconduct shall not be tolerated. Suppliers take responsibility for the performance of their sub-contractors and shall maintain oversight of their products and services. Suppliers shall communicate timely, honestly and openly with Wizz Air and shall expect fair and just treatment from Wizz Air in return.

Suppliers shall understand the current security environment and threats related to civil aviation including insider threats. Therefore, Suppliers shall assure that their personnel undergoes security vetting, background or pre-employment checks (as applicable in the Supplier's field and country). If the Supplier's personnel is expected to perform tasks at Wizz Air premises, Wizz Air reserves the right to request confirmation of above mentioned checks or perform its own checks. Depending on Supplier's scope of tasks Wizz Air reserves the right to request the Supplier's personnel to be trained for aviation security in appropriate scope.

Suppliers shall maintain confidentiality of all information entrusted to them by Wizz Air, its customers, or other third parties. Wizz Air requires its Suppliers to properly handle and protect from improper disclosure any sensitive information, including personal information, competition sensitive information and intellectual property information. Where such information is stored, processed, or transferred electronically, Wizz Air expects Suppliers to implement appropriate IT security measures



to mitigate threats to their IT environment and supply chain. This includes the requirement to immediately notify Wizz Air of any suspected or actual data breaches.

Wizz Air expects its Suppliers to respect and comply with all applicable laws regarding the protection and safety of data, including data privacy laws.

6. PROTECTION OF PERSONAL DATA

Suppliers must comply with applicable data protection laws. In compliance with data protection legislation, Wizz Air processes only personal data that is necessary for the fulfilment of its lawful purposes (e.g. in relation to its operation, in accordance with applicable legislation) and expects its Suppliers to do so. Wizz Air's and its Suppliers' data processing must rely on appropriate legal bases and the retention period of personal data must be no longer than reasonably necessary.

Suppliers must protect all personal data from unauthorised access, destruction, use, modification and disclosure, through appropriate technical and organizational measures.

7. IMPLEMENTATION AND DISSEMINATION OF INFORMATION REGARDING CODE OF CONDUCT

Suppliers must ensure:

- the implementation and follow up of the requirements in this Code of Conduct;
- that employees are prepared and aware of the requirements listed in this Code of Conduct, relevant to their responsibilities;
- that information regarding business activities, labour practices, health and safety, and environmental protection is accurately recorded.