



Policy of Good Conduct

Extract

Effective: 15th of August, 2022

The company's Policy of Good Conduct **outlines the expectations in regards Wizz Air Employees' behaviour at work, as well as behavior towards their colleagues, business partners and overall organization**. Wizz Air is committed to conducting business with honesty and integrity, and believes in doing things differently and better, and therefore created the special **"WIZZ experience"**.

Wizz Air has achieved remarkable things in a short period of time, and it would not be possible without its employees and customers, doing things in a particular way – the **WIZZ Way**. The key to the Wizz Way of doing business is: **integrity** – open, straightforward, fair and honest with everyone.



We are committed to **conducting our business with honesty and integrity**, and we expect all our employees to maintain high standards in accordance with our Policy of Good Conduct and Equal Opportunities and Fair Treatment Policy. We think that we do things differently at WIZZ. Differently and better.

The **WIZZ Way** is more than just ensuring compliance with law. The key to the WIZZ Way of doing business is integrity – **straightforward, open, fair, and honest** with everyone we deal with. You are expected to ensure that this foundation of integrity remains strong and, if you have any concerns, you are encouraged to raise them.

All employees are expected and share responsibility to act in accordance with Wizz Air's corporate culture that is **inclusive, equal, and unprejudiced**. All employees should contribute to maintaining and promote a positive, respectful, professional work environment and good relationships with all stakeholders.



I. No discrimination or harassment:

Wizz Air attempts to maintain a workplace characterized by mutual respect, and accordingly, ***Wizz Air will not tolerate, and prohibits any discriminatory practices, including harassment or unequal treatment of any kind.*** Wizz Air's commitment to create a safe and respectful working environment for all of its stakeholders is further enforced by the Equal Opportunities and Fair Treatment Policy.

The company is committed to providing an inclusive environment, regardless of:

- race, national and ethnic origin
- social origin
- gender
- age
- religion
- political views
- sexual/gender identity or expression
- marital status
- citizenship
- disability or medical history
- military status
- employment status
- any other legally protected factor.

The acts of ***discrimination and harassment constitutes a breach of trusting relationship and undermines the integrity of the employment relationship.***

Each employee is encouraged and required to:

- familiarize themselves with clauses and acts in accordance to behaviors defined in the Code of Good Conduct and the Equal Opportunities and Fair Treatment Policies;
- practice and promote mutual respect, acceptance, fairness and equal treatment;
- not engage in activities and behaviors that can be treated or seen as harassment, discrimination, bullying or vilification
- speak up and raise it when they notice or experience unacceptable behavior;
- upon need, cooperate in the investigation of a complaint while keeping confidentiality of the case

Further details on our Sexual Harassment and Equal Opportunities and Fair Treatment Policies, and applicable follow-up procedures can be found in the following sections of this policy.

II. No alcohol and drugs at work:

Wizz Air expects its employees and partners to be fully focused on their work. Therefore, anyone under the ***influence of alcohol or illegal drugs at work will be subject to disciplinary actions.***

III. The use of WIZZ's IT systems:

Company's employees have access to WIZZ's IT and other systems to allow them to perform their job properly – ***by this they agree to comply with WIZZ's IT policies.*** The system is not private and can be accessible at any time by WIZZ. Therefore, Employees shall not use the system to receive, transmit or store any materials that are offensive or obscene, and should use Internet access primarily for business purposes. The use of the Internet can be monitored in accordance with company's policies.

IV. Communication:

1) Internal communication

- **Workplace (by Facebook):** to be used for (public) company announcements, engagement campaigns, socialising and providing updates on day-to-day tasks, projects and responsibilities (Business as Usual purposes). Data class (DC0 – Public Data)
- **Microsoft Teams:** all of the above, as well as discussing, sharing or storing internal and confidential documents. Data class (DC0 – Public Data, DC1 – Internal Data, DC2 – Confidential Data)
- **E-mail:** to be used for day-to-day business purposes, as well as discussing or sharing internal, confidential, personal, sensitive personal or secret data with necessary encryption or using AIP-protected attachments. Data class (DC0 – Public Data, DC1 – Internal Data, DC2 – Confidential Data, DC3 – Secret Data)



2) Workplace and MS Teams

Workplace and MS Teams (Wizz Air's internal communications platforms), are extension of the physical work environment. As such, all WIZZ's policies, including the Code of Good Conduct, Acceptable Use Policy and Sexual Harassment Policies apply to the way employees interact on Workplace and MS Teams.

When posting or commenting on the platform, **employees are required to do it in line with WIZZ standards and corporate values. Provocative, inflammatory comments, hate speech, sexual solicitation, privacy violation, immature, or unprofessional behaviour**, which are insulting i) company, ii) its certain departments, iii) other colleagues or iv) a specific community (based on race, religion, nationality, sexual orientation, etc) **are not tolerated**. Inappropriate messages or behaviours on company platforms are to be reported to direct supervisors. Employees breaching the policy will be notified by their direct supervisors

3) Email etiquette

For internal communications, employees shall keep in mind that every electronic message leaves a trail, and they should **be selective of the information they share** and the language they use (in line with the company's Data Classification Policy).

4) External communication

For external communication only authorized personnel can act as a representative of the Company. Besides this, all communications have to secure the company's integrity and employees'



behavior should be in line with Wizz Air's aligned and professional communication in line with the company's External Communication Policy).

V. While doing business:

Integrity is key to the way we do business and to all our dealings with our customers and business partners.

1) *Legal Compliance*

WIZZ is committed to ensuring that its operations and business comply with all applicable laws and regulations. If any breach is suspected employees should inform your direct managers.

2) *Anti-corruption*

It is absolutely prohibited for any WIZZ employee or any contractors or other representatives ***to offer, pay, promise, authorize or accept any unlawful bribe*** or provide anything of value to or accept anything of value from any person in violation of any applicable anti-corruption law or the policy.

If employees receive gifts of more than nominal value by a business partner, they should inform their direct manager who will decide how best to deal with the matter. Employees shall always keep in mind ***the anti-corruption policy*** while conducting business.

3) *Competition*

Wizz Air strongly believes that ***competition is good for the market and for its customers***. Therefore it seeks to comply with all applicable anti-trust laws. As a result of this, and also as a reflection of this and WIZZ's integrity principle – there are certain things that employees cannot do, such as agreeing to carve up markets with a competitor, agreeing with a competitor to charge certain fares, or obtaining any information concerning a competitor which has not been properly and legally obtained, or which is confidential.

VI. The protection of Wizz Air and its employees

As organization operates in a very competitive industry environment it is important for employees to know how to protect WIZZ and themselves.

1) *Confidential Information*

All information that they obtain during the course of their work, or any information related to the Company, Third Parties, customers or suppliers ***shall be kept confidential and should not be disclosed***, and be in line with the company's Data Protection and Retention Policy.

2) Conflict of Interest

Wizz Air expects its employees to employ their highest personal ethics and integrity in order to serve the company's business interests, and expects them to **prevent any situation where personal interests may appear to conflict** with company interests. Potential conflicts of interest need to be reported in line with the Conflict of Interest Policy.

3) Insider Trading

Non-public information about WIZZ (also called "inside information") **must not be disclosed** to anyone else. WIZZ **shares should not be bought or sold on the basis of such information**. Similarly, in case an employee obtains non-public information about a competitor, he or she should not buy or sell shares of that competitor based on this information. The Company has adopted a Share Dealing Policy.

VII. Reporting:

WIZZ believes that in order to continue integrity of its business there shall be an effective reporting line for its employees. **If Employees suspect any breach of this policy, they should feel free to raise their concerns, and report it to the relevant personnel.** Specific policies may have particular reporting lines that should be followed.

1) Whistleblowing programme

Employees may consider it more appropriate in certain situations to make a report anonymously. They may do so by logging into WIZZ's external webmail site. It is an entirely anonymous service and employees cannot be traced. The mailbox of this website is regularly checked by the Group Corporate Officer and/or the General Counsel, who are the only members with an access to it.





VIII. Office Etiquette

All employees shall use the office and all shared areas with respect and courtesy and are expected to maintain all shared items in a good condition. Within the company there are specific rules how to handle a Visitor, and if Employee notices someone who he does not know shall feel free to ask the person or inform the Security Guards or Company Security. The Policy of Good Conduct also outlines certain etiquettes regarding meetings and the use of the meeting rooms within the office.

IX. Disciplinary Actions

In case of *non-compliance with the Policy of Good Conduct, employees shall be subject to disciplinary actions and/or civil and criminal prosecution*. Deliberate violation or serious non-compliance to this policy that led to damage to the Company, its brand or reputation as well as non-reporting about known serious non-compliance or any of the policies referred in this policy are subject to termination of employment and/or civil and criminal prosecution.