



Business Partner Code of Conduct

Content

General Compliance with Law.....	5
Anti-Discrimination and Harassment.....	6
Environmental Protection.....	6
Bribery and Anti-Corruption	6
Competition and Antitrust Law	6
Anti-Money Laundering	7
Workers' Labour Rights & Human Rights	7
(Sub)suppliers	7
Compliance, Monitoring and Remediation	7
Data Protection and safeguarding of trade and business secrets	8
Consequences of breaching this Code of Conduct	8
Ask questions and report concerns.....	8



As an international company, the Flix Group (“FLIX”) has enacted a comprehensive Code of Conduct regarding fair, ethical and non-discriminatory business conduct applying to all FLIX entities and FLIX is committed to ensure these principles together with its partners, (sub)suppliers, their employees, and all other business partners (hereinafter together referred to as Business Partner).



The Business Partner Code of Conduct (‘Code of Conduct’) is a binding standard that sets the ethical and legal expectations for how FLIX and its Business Partners must act. It serves as the benchmark for evaluating behavior in every business relationship between FLIX and its partners. As such this Code of Conduct may be used for the interpretation of the fundamental principles that underly any contractual relationship between FLIX and Business Partner.



By entering a business relationship with FLIX, each Business Partner acknowledges and accepts the applicability of this Code of Conduct and confirms that it obliges to adhere to the principles and rules set out herein. The principles and rules set out herein shall be accounted for against all activities of a Business Partner, including their employees.

The principles and rules of this Code of Conduct shall not be circumvented, e.g., by using (sub) suppliers or the outsourcing of non-compliant activities.

01 General Compliance with Law



FLIX is committed to comply with the applicable laws of all countries, in which FLIX conducts business, e.g., regarding human rights, anti-corruption, data protection, competition law, antitrust, anti-money laundering, regulatory requirements, tax, and environmental laws, irrespective of any potential commercial disadvantages this may cause.



FLIX expects the same commitment from its Business Partners. Its Business Partners shall observe all aspects of this Code of Conduct including the human rights and environmental aspects of this Code of Conduct in an appropriate way.



FLIX Business Partners must ensure that their (sub)suppliers do not violate the standards set out in this Code of Conduct. They are further required to ensure that their (sub)suppliers also adhere to the standards set out in this Code of Conduct and to establish suitable and appropriate control mechanisms.



FLIX and its Business Partners shall in particular respect in all cases the internationally proclaimed human rights, including the International Bill of Human Rights, the UN Global Compact principles, the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work including No. 29 (incl. Protocol from 11.06.2014, 87, 98, 100, 105, 111, 138 and 182 and their Protocols), as well as the International Pacts from 19.12.1966 on (1) civil and political rights economic and (2) on social and cultural rights and the German Supply Chain Due Diligence Act.

These fundamental principles shall form the basis for this Code of Conduct and may be referred to in interpreting this Code of Conduct. In case of differences between national laws, this Code of Conduct and relevant international policies or guidelines, the more stringent regulations will apply.

02 Anti-Discrimination and Harassment

FLIX imposes high standards on its employees with respect to respectful treatment of partners, colleagues, and other stakeholders and in relation to Anti-Discrimination and Harassment.

Likewise, each Business Partner shall ensure that employees, customers, and partners (incl. their employees) are treated with respect and consideration, regardless of race, gender identity, sexual orientation, physical or mental ability, religion, political affiliation, genetic information, or nationality, both internally and externally.

None of the aforementioned characteristics shall form the basis or reason for discrimination, either directly or indirectly. Indirect discrimination means imposing a condition, requirement or practice that is unreasonable or puts a person or group of people at a disadvantage based on the characteristics listed above.

There will be no tolerance for any form of harassment, including, among others, improper threats of violence, assault, personal attack, or sexual behavior.

03 Environmental Protection

FLIX is aware of its responsibility to reduce its environmental impact, therefore FLIX also expects its Business Partners to share its commitment by paying attention to environmental protection.

As part of this commitment, Business Partners are required to comply with all applicable local laws and regulations related to environmental protection and preservation.

04 Bribery and Anti-Corruption

FLIX does not tolerate in any way the offering, payment, soliciting or acceptance of corruption or bribes in any form.

FLIX Business Partners shall refrain from all forms of active or passive corruption, bribery, and other improper influences on FLIX or Business Partner's staff, public officials and other third parties.

Relationships between FLIX and public officials, companies and private parties must be established in a way any suspicion of corruption is avoided.

FLIX therefore does not permit the offering or granting of any form of favor or benefit that may be interpreted as an attempt to exert improper influence.

05 Competition and Antitrust Law

FLIX does and Business Partner shall observe applicable laws for the protection and promotion of competition, in particular antitrust laws, and regulations. In particular, no arrangements or agreements may be made that improperly influence prices or conditions, or that unlawfully restrict free competition in any way. Illegal exchange of information or price fixing agreements with competitors or suppliers must not occur. FLIX explicitly opposes espionage, theft and use of other illegal methods to gain information on competitors or their business activities.

06 Anti-Money Laundering

FLIX respects the laws aiming at combatting money laundering and terrorist financing. FLIX is therefore requiring and depending on Business Partners refraining from any money laundering or terrorist financing activities. FLIX expects its Business Partners to take the necessary measures and precautions to prevent money-laundering and terrorist financing activities. Measures will be taken to apply and not to violate any applicable sanction and/or embargo restrictions.

07 Workers' Labour Rights & Human Rights

FLIX recognizes its responsibility in creating a fair and responsible value chain, which promotes safe, non discriminatory and ethical working conditions for its value chain workers.

FLIX expects its Business Partners to respect and comply with FLIX's policy statement in accordance with German Supply Chain Due Diligence Act

FLIX expects its Business Partners and their (sub)suppliers to comply with all applicable employment and wage regulations and all regulations concerning employees' rights.

This includes, in particular, all applicable local laws pertaining to working hours, minimum and living wages, granting compulsory employee benefits as well as respecting workers' right to collective bargaining and social dialogue.

It is self-explanatory that there will be no tolerance regarding any utilization of child or forced labour.

08 (Sub)suppliers

The Business Partners undertake to actively demand and monitor compliance with the requirements set out in this Code of Conduct or equivalent requirements when contracting with third parties throughout their supply chain.

FLIX Business Partners must ensure that their (sub)suppliers do not violate the standards set out in this Code of Conduct and comply with all applicable laws. In particular, Business Partners guarantee compliance with regulations relating to the supply chain (e.g. German Supply Chain Due Diligence Act) if applicable.

Business Partners are further required to establish suitable and appropriate control mechanisms. To the greatest extent possible Business Partners shall allow FLIX to be involved and take part in the (sub)suppliers monitoring.

09 Compliance, Monitoring and Remediation

When non-compliance occurs, effective measures and proper procedures must be used to stop unlawful actions.

Business Partners must ensure that their employees and (sub)suppliers are informed about and comply with the principles set out in this Code of Conduct.

Upon request, Business Partners must prove to FLIX by providing information or granting access to their premises that they and their (sub)suppliers follow this Code of Conduct. Business Partners also agree to fully cooperate with FLIX in setting up or adjusting compliance checks when reasonably required.

10 Data Protection and safeguarding of trade and business secrets

Protecting personal data is important for FLIX. Business Partners are required to observe all applicable laws on protecting personal data.

FLIX and its Business Partners must treat each other's information that could reasonably be considered a business or trade secret as confidential. Confidential information may not be released, passed on to third parties or made available in any other way without authorization.

Confidential information must be secured at all times, including using appropriate technical measures.

11 Consequences of breaching this Code of Conduct

In case of serious or repeated violations of this Code of Conduct, FLIX is entitled to terminate existing contractual relationships with immediate effect. The Business Partners as well as their (sub)suppliers are liable to FLIX for any damages caused by violating the rules set out in this Code of Conduct. Further rights under applicable law or contract remain unaffected.

12 Ask questions and report concerns

If you have any questions or concerns about compliance with any provision in this Code of Conduct, we encourage you to reach out to your primary contact at FLIX. If you have a concern about potential illegal or unethical conduct in connection with your relationship with FLIX, please report it to the FLIX compliance desk:

Fairbusiness@flixbus.com

Your complaint will be treated confidentially and The Group Compliance Team will fully investigate the matter. There is no need to fear any disadvantage as a result of a report.

For more information on how FLIX deals with human rights and environmental violations and how it implements the Supply Chain Act, please see:

[FlixBus Supply Chain Act Documents | LkSG Compliance](#)