



Business Conduct and Ethics Policy Statement



Transition to
Net Zero



Our
People



Community
Connection



Governance
& Ethics

Business Conduct and Ethics Policy Statement

Our Commitment to Ethical Business

At Portman Travel Group (PTG), including Clarity, Destination Sport, Elegant Resorts, Evolvi and If Only, we are committed to conducting business with honesty, integrity, fairness and accountability in everything we do. Our reputation is built on the trust of our customers, employees, suppliers, business partners and the communities in which we operate. This trust is earned through ethical decision-making, responsible business practices and compliance with applicable laws and regulations.

We expect the highest standards of professional conduct across our organisation and strive to create a culture where ethical behaviour is embedded in everyday actions and business decisions.

Our Principles

We are committed to:

- Acting lawfully, responsibly and transparently in all business activities.
- Maintaining the highest standards of honesty, integrity and fairness.
- Respecting human rights and promoting diversity, equity and inclusion.
- Protecting the privacy, confidentiality and security of information.
- Safeguarding company assets and resources.
- Providing a safe, healthy and respectful working environment.
- Minimising our environmental impact and supporting sustainable business practices.
- Building trusted relationships with customers, suppliers and stakeholders.

Respect, Inclusion and Fair Treatment

We believe everyone should be treated with dignity, fairness and respect. We are committed to providing an inclusive workplace where people can be themselves and contribute to their full potential.

Discrimination, bullying, harassment, victimisation or any form of disrespectful behaviour will not be tolerated. Employment decisions are made based on merit, qualifications and business needs, without unlawful discrimination.

Integrity in Business

We operate with integrity and expect our employees and representatives to act in the best interests of the business at all times.

We do not tolerate fraud, dishonesty, corruption or unethical business practices. We prohibit bribery and facilitation payments in all forms and comply with applicable anti-corruption laws

wherever we operate. We are committed to fair and responsible business relationships and expect the same standards from those with whom we work.

We also require actual or potential conflicts of interest to be disclosed and managed appropriately to ensure business decisions remain objective and unbiased.

Protecting Information and Privacy

The protection of confidential information and personal data is fundamental to maintaining trust.

We are committed to safeguarding the information entrusted to us by customers, employees, suppliers and partners. We comply with applicable data protection and privacy laws, maintain appropriate security measures and promote responsible information handling throughout our business.

Health, Safety and Environmental Responsibility

The wellbeing of our people is a priority. We are committed to providing safe and healthy workplaces and to fostering a culture of care, wellbeing and mutual respect. Everyone within our organisation shares responsibility for maintaining safe working practices.

We also recognise our responsibility to minimise environmental impacts through the efficient use of resources, reduction of waste and emissions, and by promoting environmentally responsible behaviours across our operations

Responsible Use of Resources

We expect company assets, funds, systems and resources to be used responsibly, ethically and for legitimate business purposes. We take appropriate measures to protect our assets from misuse, loss, theft or fraud.

Speaking Up

We encourage employees and stakeholders to raise concerns about suspected misconduct, unethical behaviour or breaches of law or policy. Concerns can be raised confidentially and, where permitted by law, anonymously.

We are committed to ensuring that individuals who speak up in good faith are treated fairly and protected from retaliation.

Accountability

Ethical business conduct is everyone's responsibility. Our employees, managers and leaders are expected to uphold these principles, to lead by example and support a culture of integrity throughout PTG.

Through our commitment to ethical conduct, respect for people, responsible governance and sustainable business practices, we aim to create long-term value for our customers, colleagues, shareholders and society.

At PTG, conducting business ethically is fundamental to who we are and how we create long-term value. We recognise that trust must be earned every day through our actions, decisions and behaviours. By upholding the highest standards of integrity, respecting people, protecting the information entrusted to us, and operating responsibly, we strengthen our relationships with customers, colleagues, suppliers, shareholders and the wider communities we serve. We remain committed to fostering a culture where doing the right thing is expected, supported and celebrated, ensuring our business continues to grow responsibly and sustainably for the future.

Policy Statement

This policy statement and any associated documents are provided for general information only and do not constitute legal or other professional advice. They do not create contractual obligations or amend the terms of any agreement and should not be relied on as such. PTG may update this information from time to time and makes no representations or warranties (express or implied) that it is accurate, complete, or up to date. For further information, contact your relationship manager or GRC@portmantravelgroup.com. This statement is based primarily on UK/European requirements; additional local requirements may apply outside the UK/Europe.