

THE WINGS CODE OF ETHICS AND BUSINESS CONDUCT



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www.wings.travel

Directors: M.L. Levin* (Chairman), A. Sofianos (CEO), S. Phage, K. Maponyane, S. Figlan* [* Non-Executive].

WINGS® CORPORATE TRAVEL (PTY) LTD TRADING AS WINGS® TRAVEL MANAGEMENT. Registration number 1999/003898/07 which is incorporated with limited liability in South Africa.

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1. THE WINGS CODE OF ETHICS AND BUSINESS CONDUCT

1.1 Purpose of the code

This code is intended to raise ethical awareness and to guide us in our day-to-day decisions. It is also important as it assures our clients, suppliers and competitors of our integrity.

The code applies to all: Wings directors (executive/non-executive) and employees. The code also reflects the responsibilities of all our stakeholders, e.g. suppliers.

2. Management's Responsibilities and Obligations

2.1 To our company

- a. Be responsible for the effective communication of this code to all the employees of our company, and
- b. Take the necessary steps to ensure that our company complies with the provision of this code.

2.2 To our clients

- a. Market the services of our company accurately,
- b. Disclose all relevant information regarding the services that clients cannot reasonably learn for themselves,
- c. Charge the agreed price or, where no price was agreed, a fair price,
- d. Supply our service with a promptness that meets the reasonable expectations of our clients.
- e. Adhere to the minimum quality standards of Wings and ensure that our services conform to these standards,
- f. Provide our clients with an effective mechanism of lodging complaints and manage such complaints with due care. Refer to the Wings Travel Management complaint handling standard for more information,
- g. Manage our company with a view to consistently adding value to our clients travel management programme, and in particular, strive to reduce inefficiencies in our company. Reducing inefficiencies requires that we establish standards of efficiency in consultation with our employees,
- h. Introduce and maintain an awareness to all our employees that the resources of our company are at the lowest reasonable level,
- i. Introduce and maintain awareness to all our employees that the resources of our company, including time resources, are in limited supply,
- j. Not abuse a position of market dominance or engage in a restrictive trade practice,
- k. Not allow any acts of bribery,
- l. Respect the confidentiality of our client, and
- m. Respect the confidentiality of commercial information.

2.3 To our suppliers and creditors

- a. A Wings manager shall ensure good buying practices with suppliers of our company, and in particular he or she shall:
 - (i) Inform a supplier of any bribe or attempted bribe by the supplier's personnel of an employee of our company,
 - (ii) Terminate dealings with any supplier, which bribes employees of our company, and
 - (iii) Ensure that no bribe is paid to personnel of a supplier of our company.
- b. Ensure compliance by our company with its debt obligations to Supplier of our company on credit, in particular a manager shall:
 - (i) Manage our company in a way that does not unjustifiably increase the risk to creditors of our company,
 - (ii) Report honestly on the financial position of our company to its creditors,
 - (iii) Have regard to the interests of its creditors, when requesting an extension of time in which to pay, and
 - (iv) Inform the creditor concerned of any inability by our company to meet any such obligations.

2.4 To our employees

- a. Deal courteously with all employees, having a regard to cultural sensitivities and individual dignity,
- b. Give due attention of the training and development of employees,
- c. Provide safe and secure working conditions,
- d. When appointing or promoting employees of our Company:
 - (i) Not discriminate on any ground, and
 - (ii) Provide opportunities for individuals whose potential has been restricted by unethical legislation of social discrimination in the past.
- e. Recognise employees efforts by fair and adequate remuneration and other means, and
- f. Protect employees against physical, mental or emotional harassment by following the guidelines listed below:
 - (i) Comply with the laws governing labour relations and conditions of employment,
 - (ii) Make this Code of Ethics and Business Conduct and the reasons for it to our employees, and
 - (iii) Manage the company in such a way as not to unreasonably jeopardise the job security of our employees.

2.5 To our competitors

- a. Shall not make dishonest allegations concerning competitors of our company or concerning their products,
- b. Shall not damage the competitors other than by accepted commercial competitive practice, and
- c. Shall not acquire confidential information of a competitor via espionage, the subordination of the competitor's employees or through any other improper means.

2.6 To society at large

- a. Pay due regard to environmental and public health considerations,
- b. Not retrench employees without taking due consideration of the well-being of society at large.

3. Responsibilities and obligations of our employees

3.1 To our clients

- a. Support and assist management to fulfil its commercial and ethical obligations as set out in this code,
- b. Avoid any waste of our company's resources, including time,
- c. Respect the confidentiality of sensitive client's information, and
- d. Help fellow employees meet their obligations.

3.2 To our managers

Our employees shall perform their duties diligently and efficiently, and in particular shall:

- a. Support and assist our management to fulfil its commercial and ethical obligations as set out in this code,
- b. Avoid any waste of our company's resources, including time,
- c. Refuse any bribe and report attempted bribery to a manager,
- d. Report any harmful activity observed at the workplace, and
- e. Join management in a commitment to improve efficiency and levels of quality.

3.3 To our fellow employees

- a. Not make a false accusation against a fellow employee,
- b. Not intimidate a fellow employee, and
- c. Recognise fellow employee's rights to freedom of association.

3.4 To society at large

An employee shall pay due regard to environmental and public health considerations in and around the workplace.

4. Responsibilities and Obligations of our Clients

4.1 To Wings

- a. Pay the company for services received in accordance with the agreement between the parties, and;
- b. Not abuse a position of market dominance or engage in a restrictive trade practice.

4.2 To our suppliers

- a. Not make false allegations concerning defects in products and services supplied to them by or through our company, and
- b. Not claim a full refund or unreasonable compensation for services supplied to them, if they received the whole or part of the product or service.

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