

Baboo Code of Ethics

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About the Code of Ethics

This code aims to develop the principles that will govern Baboo's business conduct, reflecting the values, rights, and obligations that all Baboo employees have.

At Baboo, we strive to create and develop in the best environment possible, both personally and professionally.

At Baboo, we are committed to legal and ethical compliance in all aspects, and we hope that all of its employees share this commitment. Our actions have an impact on our company's reputation. It is a source of value for our clients and our most valuable asset.

All of us at Baboo are responsible for adhering to this Program.

We are open and honest at Baboo. We consider integrity, excellence, teamwork, and the written word to be some of the values that distinguish us and serve as the foundation for our daily actions. We do not allow prejudices, conflicts of interest, or third-party influence to influence our decisions.

Our Code of Business Conduct and Ethics outlines how we should conduct ourselves, and it is each of us' responsibility to be aware of it and put it into practice at all times.

The Code of Ethics

1. Mission & Values

We think that businesses should be part of the solution and aim actively to make this world a better place for all: people, the planet, and animals. Here at Baboo we have also begun the process of becoming a B-Corp, as we firmly believe that we must be the change we wish to see in the world:

- The integrity and individual commitment of each member of our team, combined with training and continuous updating, are the fundamental and indispensable pillars for our company's successful growth.
- Respect and protect the integrity of our human resources, putting their well-being and psychophysical health first.
- Encourage personal and professional growth and development.
- Dialogue with our work team to foster a positive environment that encourages cooperation and unity in the pursuit of a common goal.
- Take precautions to protect the environment.
- Work with dedication and commitment in the desire to be market leaders, maintaining the excellence of not only our products but also our human quality.

2. Rejected behaviors

We categorically reject the following behaviors and any inclination to engage in any of them resulted in disengagement from the organization in any of the following ways:

- **Bribery and corruption**

We declare that we are completely opposed to any form of bribery or corruption and any collaborator who agrees to work under those conditions will be penalized in accordance with current regulations.

- **Discrimination**

Discrimination is an unfair denial of equal treatment and opportunity to that person or group of people based on one or more of the characteristics listed below and regarding

the terms, conditions, or labor prerogatives, including but not limited to, hiring, firing, promotion, discipline, programming, training, or decision on how said collaborator should be compensated:

- Race, color, ethnic or national origin;
- Age;
- Religion or religious beliefs;
- Sex
- Sexual preference
- Gender identity and expression
- Nationality, immigration status, citizenship or ancestry are all factors to consider.
- Physical or mental disability, medical condition or genetic traits
- Socioeconomic status
- Status as a victim of domestic violence, sexual assault, or harassment; or any other ground prohibited by applicable local laws.

The list is not exhaustive and there may be other instances in which you are being treated unfairly.

- **Harassment**

Harassment is any inappropriate behavior that creates an environment that is disrespectful, intimidating, hostile, degrading, humiliating, or offensive. Harassment can take the form of verbal or physical behavior, such as comments, actions, or gestures that undermine a collaborator's dignity or psychological or physical integrity. Harassment can take many forms, from extreme forms like violence, threats, or physical contact to less obvious actions like constantly mocking, joking, or teasing employees or subordinates, or refusing to speak to them. Harassment can be defined as a single incident that has a long-term negative impact on a collaborator or a series of incidents.

3. Obligations

This Baboo Corporate Code of Ethical Conduct provides a common action model, within the framework of the Firm's Values. It offers an impeccable ethical orientation that goes beyond simple professional requirements, thus enhancing our corporate reputation and brand, while also improving customer service.

Due to the personalized characteristics of our services, as well as their peculiarities, it is considered appropriate to prepare and transmit to our collaborators the aspects that we consider relevant, at the same time that they make it possible to give uniformity to their behavior in their relationships with our clients.

It is not enough to know and understand; the Code must be followed literally and in spirit. As individuals, we are encouraged to raise any questions or problems through the appropriate channels.

It is intended to give guidelines and orientations on the standards of integrity and professional conduct; not all situations that people may face can be foreseen.

As a result, the current code does not intend or replace the responsibility and requirement to make sound judgments or to seek advice on proper professional conduct. If necessary, seek additional guidance and support from the responsible parties on professional conduct issues.

1. Collaborate in Maintaining the Good Name of Baboo

- **COMMITMENT:** Our customers trust Baboo on the basis of our competence and professional integrity, qualities upon which our reputation is built. We maintain that reputation.
- **SCOPE OF SERVICE:** Our intention is to provide services only to those clients that we have the capacity to serve, who value our services and who meet integrity requirements.
- **COMMUNICATION:** When we address an audience that reasonably expects us to speak on behalf of Baboo, we are generally speaking Baboo's opinion and not our own.
- **RESOURCES:** We use all the resources of Baboo and our clients, including physical, intellectual and electronic resources, in a responsible and professionally appropriate manner, only for lawful and permitted purposes.

2. Professional Behavior

- **PRINCIPLES OF ACTION:** We provide professional services directing our actions with honesty, integrity, clarity, and attitude of customer service that we interact under the corresponding technical and professional standards.
- **CREATIVITY AND INNOVATION:** We apply the best and most innovative tools and solutions to our clients' problems, looking for the best ideas and concepts
- Adhering to four fundamental principles: the Client, the Cost, the Convenience and the
- Communication.
- **COMPETITION:** We actively compete, only using legal and ethically acceptable methods.
- **OBLIGATIONS:** We comply with our contractual obligations, reporting on our services and charging for them honestly.
- **CONFIDENTIALITY:** We respect the confidentiality and privacy of our clients, our staff, and others with whom we do business. We comply with applicable rules and

regulations and professional standards in order to properly maintain the confidentiality and privacy of information.

- **CONFLICT OF INTEREST:** We try to avoid conflict of interest. When potential conflicts of interest are identified, and we consider that the interests of the parties can be protected by implementing appropriate procedures, we do so.
- **OBJECTIVITY:** We highly value our independence of judgment. We honor the trust they place in us, our clients and other stakeholders by complying with the provisions established by the competent authorities and professional standards, which are willing to allow us to carry out our activity with the necessary objectivity. In our work we ensure that our independence is not compromised, or can be perceived as such. We deal with circumstances that impair or appear to impair our objectivity.
- **CORRUPTION:** It is not acceptable for us to request, accept, offer, promise or pay bribes. Report any corrupt practice.

3. Respect for Others

- **RESPECT FOR COWORKERS:** We treat our coworkers, clients, and others with whom we work professionally with dignity, fairness, and courtesy.
- **DIVERSITY:** We are dedicated to creating a work environment free of discrimination and harassment.
- **INTEGRITY:** We strive to make work and personal life compatible, and we assist others in doing so.
- **WARNING:** We invest in the ongoing development of our skills and abilities.
- **HEALTH AND SAFETY:** We provide a safe working environment for our professionals.

4. Social Ethics

- **HUMAN RIGHTS:** We express our support for fundamental human rights and refrain from engaging in human rights-abusive economic activities.
- **TRANSPARENCY:** Through our practices, we ensure and encourage Baboo's management to be transparent.
- **CORPORATE SOCIAL RESPONSIBILITY:** We act in a socially responsible manner and contribute responsibly to the community's development.
- **RELATIONSHIP WITH THE COMMUNITY:** We encourage employees to participate in pro bono work for non-profit organizations.
- **ENVIRONMENT:** We strive to minimize the environmental impact of our professional activities.

5. Our Responsibilities

- **CODE VIOLATION:** Each of us must consistently and appropriately apply the Code of Conduct and Baboo policies, and assist others in doing so. When a violation of our Code of Conduct is reported or suspected, we will investigate and, if necessary, correct the situation.
- **ANONYMOUS REPORTING:** We are encouraged to report and express our concerns in an honest, fair, and respectful manner. Baboo is determined to keep his members safe from retaliation. Those in the chain of command are responsible for taking into account the information that is brought to their attention.
- **DISCIPLINARY MEASURES:** Anyone who violates the Code or Baboo policies and procedures may face disciplinary action, including termination. Such penalties will also be imposed on anyone who orders or approves violations or who becomes aware of them but does not immediately correct them.

6. Conduct Guidelines

Correct behavior entails professional, honest, respectful, and equitable treatment of Baboo members as well as clients, suppliers, officials, and the general public, motivated by a respect for the individual and for society. You may not disrespect, insult, or defame them in any way.

- **COMMERCIAL LOYALTY:** Baboo declares that it is fully in compliance and observance of what is established by legislation regarding Commercial Loyalty, and that the guiding principle of all its commercial strategy respects and abides by what is regulated in this regard; declaring manifestly against any commercial practice that does not respect said regulations.
- **RELATIONSHIPS WITH THIRD PARTIES:** All members of Baboo must address themselves, as well as their hierarchical superiors, clients, suppliers, contractors, national, municipal, or provincial authorities, administrative, and the general public, in a respectful, professional manner, without insulting or defaming anyone under any circumstances.
Those hired by Baboo to provide services must demonstrate their opposition to corrupt practices and conduct that contradicts the provisions of this Code.
- **CLIENTS:** The relationship with the client must be characterized by respect, professionalism, courtesy, and kindness, with clear and concise information about what prompted the query provided at all times. The client must be given an answer to his concerns, all while maintaining respect, professionalism, legality, and meeting the deadlines.
- **RELATIONSHIP WITH PARTNERS:** The selection of various partners must be based on objective criteria such as their professionalism, level of benefits, and services offered. Baboo will not contract professional services from providers who have a history of corrupt acts and/or conduct, money laundering, terrorist financing, or illegal practices, either directly or indirectly. Similarly, Baboo declares that it is aware of and adheres to all anti-corruption practices.

When selecting suppliers, we will prioritize those who share this Triple Impact perspective, are within a local radius of less than 80 kilometers, and have responsible and ethical management practices.

- **RELATIONSHIP WITH THE PUBLIC ADMINISTRATION:** Baboo declares and declares that it submits to and fully abides by the administrative and judicial resolutions imposed on it by its activity in the performance of its tasks.
- **CONTRACTS WITH THE GOVERNMENT - TENDERS:** All Baboo personnel are strictly prohibited from engaging in any type of inappropriate behavior in order to win any contract or tender to which they are presented as a bidder. Baboo values transparency in all of its business operations.
- **RELATIONSHIP BETWEEN BABOO MEMBERS:** Baboo is committed to providing its associates with a work environment that is healthy, respectful, worthy, enjoyable, cooperative, productive, and safe.

We care a lot about the people who make it up at Baboo. We assist them in their development by providing training; in their health concerns by providing adequate coverage; and in their family matters.

Members and associates of Baboo must:

- be respectful and value human beings;
- manage with the values outlined in this Code;
- and report situations, facts, fraud, deception, or conduct that violates the law and those outlined in this Code.

7. Diversity Guidelines

Baboo declares that it opposes all forms of discrimination, including those based on race, color, gender, or sexual identity, union policies, religion, or other distinctions. As a result, comments, conduct, or inappropriate behavior that harass or harm another member or third party or create a hostile work environment will not be tolerated. Said behaviors must be immediately reported to the superior and/or through the various reporting channels.

We advocate and support the claim of a more just society, free of any gaps or exclusions based on gender, creed, ethnic origin, or sexual identity. It is part of our commitment to collaborate from our location in order for this to occur, and we will act accordingly.

8. Confidentiality and Use of Data

The members of Baboo, as well as the contracted personnel and their suppliers, agree to maintain complete confidentiality regarding the information they access in the course of their duties.

They may not, under any circumstances, reveal, disclose, or make public confidential information that has come to their attention, unless required by the court.

Commercialization and/or dissemination of any type of information from Baboo is prohibited, as the company reserves all rights and intellectual property over all information, inventions, and/or creations developed by Baboo members as a result of their work activity.

Even if the employee no longer works at Baboo, the obligation to keep the information confidential remains in effect. The client, on the other hand, will have the option of deciding how to use the data.

General Rights:

You are entitled at any time to stop receiving promotional material such as our newsletters, by selecting the “unsubscribe” link contained in any and all email communications, or by contacting us at help@baboo.travel. After doing so, we will cease to send any marketing material. However, please be advised that we will still need to contact you, should you have any upcoming travel plans booked with us, in order to arrange details, and/or should it be legally required.

If you have an account with us, you can access and edit any information therein provided, by signing in to your account and selecting the information you wish to edit. You can also edit and update any previous reviews uploaded to the platform, or contact us at any time at help@baboo.travel, to request whichever changes you wish to make regarding the personal information disclosed in order to set up the account. For any additional questions regarding the privacy policy hereunder or our use of your personal information, please contact us at help@baboo.travel.

Our common practice relating to the duration for which we maintain and store your information is described above, however, should you wish for earlier removal of your information, please contact us at help@baboo.travel. Please note that whether or not we may be able to remove your information, is determined on a case-by-case basis, and in some cases, it may not be possible. For example, if the data is not in a searchable format; if it is stored in a backup system; cached or archived pages; if it is required to prevent fraud or future abuse; and/or, if we are required by law to keep it.

Delaware Residents:

Delaware law permits its residents to request details about how we disclose personal information to third parties for such third parties’ own marketing purposes. If you are a Delaware resident and would like to request this, please contact us at help@baboo.travel. Please note that there are legal limits regarding the frequency of such requests, and we are only compelled to respond to one information request per customer per year.

In addition, although users of our platforms must be at least 18 years old to enter, any Delaware residents under this age that has improperly used the site can request removal by contacting us at help@baboo.travel; detailing the location of such content and confirming it was them that posted it. Following such request, we will terminate the unauthorized account and will make reasonable good faith efforts to remove the content from public view, or make it anonymous, in order to avoid exposing such minor. Nonetheless, removal can under no circumstances, ensure complete or comprehensive removal, or that third parties abstain from manipulating web content in such a manner that may be out of our reach.

EU Citizens/Residents:

For users in the European Union (EU), the privacy policy hereunder attempts to comply with Regulation (EU) 2016 of the European Parliament and of the Council of 27 April 2016, (the “General Data Protection Act” or “GDPR”). If you are in the EU, you have the following rights, subject to certain limitations and exceptions imposed by the GDPR:

- a. Access: The right to request copies of your personal information.
- b. Correct: The right to ask for personal information to be corrected in case it is inaccurate or incomplete.
- c. Erase: The right to request removal or deletion of your personal information from our databases.
- d. Restrict Use: The right to block or limit the ways in which we can use your personal information.
- e. Data Portability: The right to request that your personal information is transferred to another provider.
- f. Object: The right to oppose yourself to our use of your personal information, even if it is for legitimate interests or marketing purposes.

Should you have further questions regarding the aforementioned rights, please contact us at help@baboo.travel, and in case our response fails to adequately respond to your inquiry, you are entitled to file a complaint before your local Data Protection Authority.

9. Channel for Complaints

To report a problem with Baboo or make a complaint, please email help@baboo.travel with the subject line “Baboo Comments & Complaints”. We’ll look into any legitimate complaints and answer as soon as possible.