

Sustainability Policy – Code of Conduct

Our Commitment to Sustainability

The management of 3etravel is committed to improving the company's sustainability performance and supports the company's sustainability mission statement and sustainability policy.

We will use the Travelife platform to analize, report, develop and evaluate our progress on sustainability. We commit to reporting (publicly) on our sustainability performance every two years (via the Travelife report).

Sustainability Management & Legal Compliance

3etravel is committed to continuous improvement of sustainability practices, including ongoing monitoring and evaluation of our sustainability policies.

3etravel complies with all local, regional, national and international regulations relating to human resources, human rights, children's rights, land rights, environmental management, wildlife and land use. We adhere to a strict code of ethics, which includes a zero-tolerance policy on corruption, bribery, forced labour, child abuse and discrimination.

Our objectives

Since than we have taken, and continue to take, steps to improve our sustainability, both in the office and in the travel services we offer.

We aim to further reduce any negative social, cultural, economic and environmental impacts of the company's activities, including employee related health and safety aspects.

We strive

- to expand our product portfolio to less developed regions of Montenegro,
- to support the local communities there,
- to support local investments,
- to engage to conserve and protect the environment and biodiversity of Montenegro's protected areas
- and to do our best in tour design and operations to mitigate climate change, and encourage others to do the same.

Internal Management

Social Policy and Human Rights



We are aware that our employees are our greatest asset in order to be able to offer our customers meaningful travel experiences. Therefore, we have a clear HR policy to ensure:

- Support in both career-related and job-related professional development activities.
- Commitment to the principle of fair and equal remuneration for equal work and work of equal value for all its employees and contractors, regardless of gender, race, national origin, marital status, age and religion.
- Commitment to promoting a safe, healthy and inclusive workplace and work culture where all employees are empowered to perform their jobs and realize their potential.
- Commitment to a zero tolerance policy towards bribery, corruption, discrimination and human rights violations, including forced labour, human trafficking and all children's rights.

3etravel also expects this obligation from all partners and suppliers.

Office Environment management

- 1. We review the use of disposable and consumer goods (such as paper) and plan actions for reducing use and for reducing our solid waste. Our current actions include only one central default printer, which is mainly used to print documentation for accountancy. We also refill toner and ink cartridges which purcharse with company Kvisko.me
 In tour design and operations our data is stored and exchanged digitally (i.e. via email, messengers or shared databases Airtable and Dropbox)
- 2. All staff members have a responsibility to minimise their use of disposable goods.
 - Waste is sorted at the moment in two separate bins for paper and residual waste. In our new office premises we will add bins for glass bottles, cans and PET bottles. The office will have a fully stocked kitchen with glasses and mugs that may be used by staff. We encourage to drink the safe to drink tap water, to reduce the use of single-use plastic water bottles.
- 3. We purchase sustainable products wherever possible; when sustainable options are available, are of sufficient quality and are not of unreasonably high costs. We prefer to buy at local shops against international online suppliers.
- 4. We are actively committed to reducing our energy consumption, both within the office and in our services. We already use energy-saving LED lighting, keep all our equipment on energy-saving mode, and ensure aircondition or heating is used when only really necessary.



- 5. We ensure that all lighting and equipment (including computers, printer) are turned off when not in use. The last employee leaving a room must always turn the lights off.
- 6. We ensure all leaky taps are fixed promptly to minimise our water consumption. We also use water responsibly when washing our vehicles and bicycles (only when really necessary) and ensure taps are left running.
- 7. Our employees mainly work remotely in off-season from November to March. This reduces the need to travel to and from the office, but keeps energy consumption for heating the office premises down. Furthermore our office premises are located in the city center with which is connected public bus lines.
- 8. For office cleaning purposes we use ecological cleaners. Eg. FROSCH, or SONETT
- We communicate our expectations regarding sustainability to our employees (including tour guides) in informal team meetings to explain the importance of sustainability in the company.

General partners / suppliers: internal policy

3etravel is committed to sourcing its products and services responsibly and to avoiding harmful effects on society, culture and nature as much as possible. We expect the same level of commitment and commitment from our partners and suppliers.

- We prefer to work with partners who share the company's commitment to sustainability and mutual trust in our joint partnership.
- We prefer to work with locally owned suppliers in destination areas, as well as lodging and catering establishments run by local families that use local and seasonal products and services that benefit the local community.
- Whenever possible, 3etravel selects partner companies that meet tourismrelated, internationally recognized (GSTC-accredited or EU Ecolabel) certifications, (Remark: those are still a rare find in Montenegro.)

3etravel monitors its suppliers to adhere to a basic code of conduct that includes the following responsible business practices:

- Compliance with all local, regional, national regulations; (international regulations are not yet applicable for most local businesses)
- Respect for all human rights, including the rights of workers, children and women



Transport

We take into consideration the number of people travelling, how much luggage they have, price and comfort. Number of empty seats and empty drives are minimised in order to reduce GHG emissions per person as much as possible. We use local transport to avoid empty runs of vehicles from more distance places.

The transport options owned by the company is a 8+1 seater mini bus. Our vehicle imeets EURO 6 standard.

For larger groups, where coaches are hired, we match the size of vehicle to the group size in order to reduce emissions per person and hire new/er vehicles which meet min. EURO 5 standard.

Sometimes multiple smaller vehicles may have to be used for transfers to remote places, due to the bad road conditions, but this is rare, and efforts are made to avoid this scenario.

We do not offer any motorized outdoor activities as there are Jeep tours, ATV and Buggy tours.

We include where possible and comfortable public transfer options, eg. train journey Kolasin to Podgorica/Bar or public bus lines for transfers on our self-guided tours.

Accommodation

In the next 5 years we endeavour for all our contracted accommodations to have their own sustainability initiatives.

We wish to contract more sustainable accommodations, especially those with internationally acknowledged travel certification, and include our sustainability policies within any relevant contracts, but at the moment options are very limited in Montenegro.

Tours & Activities

All excursions and activities conducted by or on behalf of 3etravel respect local customs, traditions, cultural integrity and natural resources.

We do not offer activities that harm humans, animals, plants, natural resources (e.g. water/energy), or are socially/culturally unacceptable.

Our guides are instructed to introduce our customers are well informed on culture and customs for more sensitive tours, such as visits to National Parks or religious sites.



We do not offer no activities where wildlife are killed, consumed, displayed, sold, or traded.

We ensure we have licensed guides when visiting religious sites (heritage sites or ecologically sensitive destinations, who are well-educated on the site, the culture and the history.

Our tour guides are knowledgeable regarding the destination including relevant sustainability aspects. They all received basic and additional vocational training. They are able to provide information and interpretation to customers on relevant sustainability matters in the destination (e.g. endangered fauna & flora, how logging, overgrazing and poaching for subsistence purposes is threatening habitats, preservation of sanctuaries), social norms and values.

Many of our activities directly involve and support local people and businesses (e.g. Wine tastings, Farm Experience, Kayaking etc). We recommend local restaurants and shops to our customers, inform them of the traditional craftsmanship and local industries, as well as help them interact with the locals. We also prefer working with accommodations and restaurants that incorporate elements of local art, architecture or cultural heritage; while respecting the intellectual property rights of local communities.

We offer tours and activities that support the local environment and biodiversity, such as visiting Montenegro's National Parks. Those tours are guided by expert guides.

When choosing new tour destination within Montenegro, we consider sustainability aspects, such as community participation. We pride ourselves on our off-the-beaten track local knowledge and offer many alternative non-mainstream destinations.

We and our guides do not promote souvenirs which contain threatened flora and fauna species as indicated in the CITES treaty and the IUCN 'Red List'; historic and archaeological artefacts (except as permitted by law). We strongly discourage all our customers from purchasing these types of goods.

Tour guides, local representatives and tourist guides

3etravel is committed to employing qualified local tour guides or other local staff, paying them a living wage and providing safe and fair working conditions.

We are aware that the tour guide is the intermediary between the guests and the socio-cultural and ecological context of the destination and teaches the guests the appropriate behavior on site. As such, we endeavor to ensure that all Tour Guides employed by, or leading tours on our behalf receive regular training and are aware of, or are provided with information about accessing, sustainability issues at the destination.



3etravel offers travel guides learning opportunities on sustainability issues, including free access to Travelife's online learning platform and participation in international vocational guide trainings. (eg. Financial support for the participation of our guides in one of our partners guide training in Austria)

Customer Communications and data protection

Protecting our customers is our priority. We to ensure the following:

- Compliance with legal regulations in all areas.
- Customers and their data are protected. Customer data is not shared with 3rd parties.

3etravel strives to communicate truthfully in all situations and at all times.

- We offer products and services that reflect what we claim in our communications.
- We keep our explicit and implicit commitments and promises.
- We are against greenwashing and stand behind our sustainability claims 100%.
- We strive to be inclusive and representative in our marketing, always considering cultural, religious and ethnic sensitivities.

Communication on sustainability

Our customers are informed about the social and environmental impact of their trip and educated about the sustainable choices they can make:

- Activities and excursions that benefit local communities and the environment
- Responsible shopping and illegal souvenirs
- Visit to social and environmental projects

3etravel maintains open communication with its employess and customers and is always open to feedback on all topics, especially sustainability.

Contact person and head of implementation: Angelika Temper-Jablan, management and sustainability coordinator of 3etravel.

All staff are responsible for compliance with this policy.



All employees are responsible for promoting and implementing this sustainability policy within their departments.

This policy is effective from 1.7.2023