AVENUE TWO TRAVEL

Responsible Lobbying Policy

A2 is a luxury travel and tourism company and a member of the American Society of Travel Advisors (ASTA). This policy sets out the commitments we make when engaging in lobbying activities in the United States and how we monitor compliance with them.

1. Responsible Lobbying Approach

a) **Positive impact:** We are a member of ASTA because its actions and initiatives have a positive impact on society and the environment, including traveler protection, sustainable tourism and the responsible development of the industry. We do not lobby against the public interest.

b) **Evidence-based positions:** Our positions are grounded in reliable data and, where applicable, in verifiable scientific or technical evidence. They are never based on speculative information.

c) **Legal compliance:** We comply with all applicable federal, state and local laws on lobbying, disclosure and campaign finance, including state contribution limits.

d) **Political contributions:** We do not make direct corporate political contributions. The only contributions permitted are voluntary, documented personal contributions to industry political action committees, such as ASTAPAC, within the limits set by the Federal Election Commission (FEC). Such contributions are never required of any employee or made a condition of employment. Any authorization for ASTAPAC to solicit our eligible personnel is granted in writing by the executive team, for one calendar year at a time and to only one trade association per year. Only eligible individuals may contribute. Contributions from foreign nationals are prohibited.

e) **Anti-corruption and anti-bribery:** We have zero tolerance for corruption. Offering, promising or giving money, gifts or any other benefit to a public official in exchange for an official decision is prohibited. Exceeding the gift and travel limits set by applicable ethics rules is also prohibited.

f) **Intermediary organizations:** Because we lobby through a third party, ASTA, we first verify that its position is consistent with this policy and with our company's principles before publicly supporting it. When it is not, we refrain from supporting it. If a significant inconsistency persists, the matter is escalated to the Board of Directors. They may express our disagreement within ASTA and, if necessary, reconsider our membership.

g) **Codes of ethics:** As a condition of ASTA membership, we adhere to the ASTA Code of Ethics. Our advocacy is also guided by the Global Code of Ethics for Tourism, which ASTA has signed.

h) **Approval and review:** This policy is approved by the company's Board of directors and reviewed at least once a year. It is reviewed sooner if applicable regulations or ASTA's advocacy strategy change.

2. Governance, Oversight and Risk Management

a) **Compliance responsibility:** The executive team and the Board of Directors are responsible for compliance with this policy. They review it and make any changes needed to ensure that our lobbying activities follow the company's ethical guidelines.

b) **Implementation:** This policy is communicated to all personnel involved in advocacy activities and is included in their training. It is enforced by requiring prior authorization for every lobbying contact.

c) **Risk management:** Risks of non-compliance are identified through our internal log of lobbying contacts and through active participation in ASTA meetings. They are managed by requiring prior approval of any new position.

d) **Framework assessment:** The governance and oversight framework is assessed as often as the Board of Directors determines, and at least once a year.

e) **Grievance procedure:** Any stakeholder may raise concerns about our business conduct or lobbying practices through our existing grievance procedure, without fear of retaliation.