

Sustainability policy of MTS Globe Spain

Sustainability management & legal compliance

Sustainability commitment

MTS Incoming S.L. leadership is wholly committed to the company's sustainability performance and endorses the company's sustainability mission statement and policy.

We will use the Travelife platform to report on our sustainability progress and to monitor and evaluate progress. We are committed to communicating our sustainability performance every two years.

Sustainability management & legal compliance

MTS Incoming S.L. commits to continuous improvement of sustainability practices, including the ongoing monitoring and evaluation of our sustainability policy, with dedicated personnel and resources to achieve our sustainability goals.

MTS Incoming S.L. follows all local, regional, national, and international regulations as they relate to human resources, human rights, children's rights, land rights, environmental management, wildlife, and land use. We follow a strict Code of Ethics, including a zero-tolerance policy for corruption, bribery, forced labor, and discrimination.

Internal management: social policy & human rights

Employees

- We recognize that our employees are our biggest asset for delivering meaningful travel experiences to our customers. Therefore, we maintain a clear human resource policy to ensure:
 - Legal compliance in all regards
 - A safe, healthy, and welcoming workplace
 - Fair contract conditions including fair compensation
 - Training opportunities including trainings on topics of sustainability, sexual harassment and exploitation in the workplace and in the industry
 - Participation in the sustainability planning activities
 - Inclusion and equal opportunity for all employees, particularly with regard to compensation, promotion, distribution of benefits, and professional development opportunities.

Internal management: environment

Energy saving policy:

Environmental management of office operations

- We are committed to keeping the direct footprint of our business operations as minimal as possible and actively follow the 5Rs (refuse, reduce, reuse, repurpose, recycle) principle. We have the following measures in place:
 - Follow all local and national regulations concerning environmental law
 - When buying products we always give preference to sustainable products, especially in terms of water, waste, energy, and carbon

- Procure office supply. locally, seasonally, fair trade, in bulk, with limited packaging, sustainability certified whenever possible
- Print only when absolutely necessary, and when printing, always print double-sided on grayscale. Paper must always be FSC or equivalent certified, with preference for the highest percentage post-consumer materials
- Energy saving measures are in place in all common areas
- All equipment and lighting is energy-efficient and turned off/unplugged/on sleep mode when not in use
- Water saving measures are in place in all common areas and restrooms, including water capture in external areas
- Waste is separated into the following categories: (plastic, organic, paper products, metal, hazardous, glass, e-waste, waste to landfill) and is disposed of properly by municipality
- Noise, light, and air pollution is minimised.

Heating and ventilation:

- We have set up a procedure to switch the heating/cooling system off at night and on weekends;
- We have programmed the individual heating/cooling periods and temperatures optimally. For example, a temperature for daytime, night-time, weekends, holidays etc.;
- We optimize the heating/cooling system and, where possible, install electronic thermostat valves;
- We insulate external walls, roof, ceilings, etc. and ensure they are maintained regularly and checks for leakages;
- We have set up new aircon system which consumes less power.

Lighting:

- In the office we try to maximize the use of daylight, for example by making sure all windows are accessible and clean.
- We replaced conventional light bulbs with LED lights
- The lighting in offices works with ambient light sensors, which regulate the light based on sunlight
- We use timers and/or sensors for evening/night lighting
- We use timers and/or sensors for stairway and bathroom lighting
- We minimise the electricity consumption by switching off lights, computers, air conditioners, fans etc. in rooms that are not in use and at night.

Technical equipment:

- When purchasing computers and printers, we look for energy labels and compare energy usage;
- All screens are set to automatically go on stand-by after not being used for approx. 20 minutes;
- Printers are set to be switched off at night and outside office hours, they go into power saving mode when not in use
- We have pre-set all equipment to energy-saving mode;
- Fridges in the office are properly used and regularly emptied. The freezer is defrosted regularly.

Emails:

Emails and Internet use also generate carbon footprint.

- We use links and shared folders instead of sending heavy attachments;

- We are maintaining your servers accordingly.

Carbon management of office operations

- MTS Incoming S.L. is committed to reducing our carbon footprint and endeavours to reduce the amount we travel as much as possible by:
 - Reduce the amount we travel as much as possible
 - Encouraging remote work whenever possible, and when it is not possible, making it easier for employees to limit their carbon footprint by use of eco modes of transportation.
 - Implementing procedures such as [e.g. digital e-mail signature, digitalization, LED lights, Solar panels on new offices where feasible)
 - Installing energy efficient equipment and appliances (where appropriate and possible)

Land use

- MTS Incoming S.L. offices are located in a suburban area and abides by all local land use laws, respects local cultural and natural resources in our business operations, and favours sustainable architecture and design.

General suppliers policy

- MTS Incoming S.L. is committed to sourcing its products and services responsibly, avoiding harmful impacts on society, culture and nature as much as possible. We expect the same level of engagement and commitment from our suppliers.
- MTS Incoming S.L. prefers to work with partners that share the company's commitment towards sustainability. This means that we prefer partners that have a written sustainability statement as an integral part of their business policy and/or a clear sustainability policy in place.
- MTS Incoming S.L. prefers to work with suppliers in the destinations that are locally owned or managed, use local and seasonal products and services and benefit the local community by hiring locally and equitably and by providing fair working conditions.
- Whenever possible, MTS Incoming S.L. prefers to select partner companies that comply with tourism-specific, internationally recognized (GSTC-accredited) certifications, or other sustainability certifications like B Corp or ISO.
- Following a zero-tolerance policy, MTS Incoming S.L. will immediately terminate any relationships with suppliers that violate our policies and contracts, specifically through acts of bribery, corruption, discrimination, and violation of human rights.
- MTS Incoming S.L. maintains open lines of communication with our suppliers and partners and encourage feedback from our stakeholders at any time and on any topic, particularly sustainability.

- MTS Incoming S.L. take equality seriously and developed an equality plan which states different measures (Salary level, amount of employees)

Inbound partner agencies

- MTS Incoming S.L. is an inbound / receptive partner agent in Spain. We do not have inbound or receptive partner agents.

Transport

- When selecting transport for guests and business related travel, MTS Incoming S.L. commits to choosing the most environmentally friendly options available for travelling to, from, and within the destination – taking into consideration distance, price, route, and comfort.
- MTS Incoming S.L. has planned to define clear guidelines for reducing GHG emissions from transport and selecting the most environmentally friendly transport options, including the following measures:
 - Preferring ground transport over air transport for short-haul travel destinations
 - Avoiding in-destination flights as much as possible
 - Offering rail-and-fly transport to and from the airport
 - Using public transportation options in the destinations
 - Using appropriate vehicle sizes for group sizes and purchasing most efficient vehicles available
 - Training drivers on eco-driving techniques

Accommodations

- In the accommodation selection process, MTS Incoming S.L. considers the sustainability practices of an accommodation by taking into account their sustainability management and social and environmental footprint.
- MTS Incoming S.L. favours the selection of accommodations that respect and protect land use, as well as respectfully highlight elements of local architecture, customs and traditions
- MTS Incoming S.L. actively request all hotels through questionnaires if they have sustainability certificate.
- MTS Incoming S.L. includes standard sustainability clauses in all contracts with accommodation providers (e.g. child labour, anti-corruption and bribery, waste management and protection of biodiversity).
- MTS Incoming S.L. supports collaborative initiatives with other tour operators and stakeholders to promote sustainability.

Activities & Excursions

- All excursions and activities run by or on behalf of MTS Incoming S.L. respect local customs, traditions,

cultural integrity, and natural resources.

- MTS Incoming S.L. commits to not offering any excursions that harm humans, wildlife, environment, or natural resources such as water and energy.
- MTS Incoming S.L. will in the future provide excursion and attraction providers opportunities for sustainability learning and management, including free access to the Travelife online learning and reporting platform.
- MTS Incoming S.L. commits that all offered excursions, attractions and activities are properly regulated activities in compliance with local, national and international law.
- MTS Incoming S.L. does not promote or engage in activities that harvest, consume, display, sell, or trade wildlife species, except as part of a regulated activity that ensures that their utilisation is sustainable and in compliance with local, national and international law.
- MTS Incoming S.L. trains its guides and tour leaders the necessary training to provide clients with comprehensive information about the excursions. When an excursion includes a site of cultural interest, we are required by law to have an official guide present.
- MTS Incoming S.L. supports small businesses and provide clients with cultural experiences in the destination.

Tour leaders, local representatives, and guides

- MTS Incoming S.L. commits to hiring qualified local guides, porters, drivers or other local staff, paying them living wages (above average) and providing safe and fair working conditions.
- MTS Incoming S.L. understands that guides are the intermediaries between the guests and the socio-cultural and environmental context of the destination, conveying the appropriate behaviour to them. Therefore, we make sure that all guides hired by or leading tours on behalf of MTS Incoming S.L. are knowledgeable about the sustainability topics of the destination.
- MTS Incoming S.L. will provide guides with learning opportunities on sustainability topics including providing free access to the Travelife online learning platform in the future.

Destinations

Sustainable destinations

- MTS Incoming S.L. prefers to work in destinations that have committed to sustainability as an integral part of community and destination development.
- MTS Incoming S.L. does not support destinations that have a questionable human rights track record.

Contribution to local communities / local economic network

- MTS Incoming S.L. commits to positive contribution to the destinations in which we operate, by:
 - Sourcing locally and responsibly, and supporting local and traditional arts and culture
 - Encouraging guests to shop responsibly and educating them about illegal/prohibited/forbidden souvenirs
 - Respecting and advocating for all human rights (i.e. children's rights, women's rights, labour rights, etc.) as well as land rights

Environmental stewardship in destinations

- MTS Incoming S.L. commits to environmental stewardship in the destinations in which we operate by:
 - Ensuring natural resources remain intact
 - Educating guests about the principles of responsible travel and responsible visitor behaviour

Customer communication and protection

Privacy

- Our customer protection is our priority. Therefore, we maintain a clear privacy policy <https://mtsglobe.com/privacy-and-cookie-policy/> to ensure
 - Legal compliance in all regards
 - Customers and their data are protected
 - Customers know how their information is being used

Marketing and communication

- MTS Incoming S.L. strives to be truthful in all situations and at all times. We offer products and services that do what we claim in our communications.
- We honour our explicit and implicit commitments and promises.
- We are anti-greenwashing and stand behind our sustainability claims 100%.
- We endeavour to be inclusive and representative in our marketing, and to always take into account cultural, religious, and ethnic sensitivities.

Sustainability communication

- Customers are informed about the social and environmental impact of their journey, and are educated about

the sustainable choices they can make, including transparent communication on:

- Certified accommodations
- Compensation of their trips CO2 emissions
- Activities and excursions that benefit the local communities and environmental protection
- Responsible shopping and illegal souvenirs

Customer experience

- The company aims for all customer experiences to be positive, and follows strict health and safety, marketing, and excursion policies to ensure customer satisfaction. These policies cover specific topics of (but not limited to):
 - Health and safety
 - Emergency procedures
 - Privacy
 - Group numbers
 - Greenhouse Gas emissions and offsetting
 - Transport
 - Shopping
 - Sexual exploitation
 - Children in tourism
 - Satisfaction and complaints

- MTS Incoming S.L. maintains open lines of communication with our customers and encourages feedback at any time and on any topic, particularly sustainability.

Contact / Responsible person

All staff are responsible for the ownership and undertaking of this policy.

All staff are responsible for the promotion and implementation of this sustainability policy within their departments.

The implementation of this policy will be lead by the Sustainability Coordinator, Swantje Hansen, who can be reached at swantje.hansen@mtsglobe.com.

Effective date

This policy is effective from 24.01.2025.

Revision history

This policy was revised on 23.01.2025

This policy will be revised by December 2026.