



Ethics Policy

Letter from the Operations Director

At Blue Diamond Deluxe Private Transports, integrity is the foundation upon which we build every relationship. Whether serving our customers, employees, suppliers or business partners, we believe that ethical conduct is essential to earning and maintaining the trust that has become one of our company's greatest assets.

As a provider of premium private transportation services, we understand that our clients place not only their journeys but also their confidence in our hands. This responsibility requires us to conduct all business activities with honesty, transparency, professionalism and accountability while complying with the highest ethical and legal standards.

Our commitment extends beyond legal compliance. We strive to foster a culture in which ethical behavior guides every decision, where confidential information is protected, conflicts of interest are appropriately managed, and business relationships are conducted fairly and responsibly.

This Ethics Policy establishes the principles and commitments that govern our business conduct and reflects our determination to promote integrity throughout our organization and across our value chain.

Our policy supports the United Nations Sustainable Development Goal SDG 16 – Peace, Justice and Strong Institutions, reinforcing our commitment to responsible governance, transparency, ethical leadership and respect for the rule of law.

Every employee, business partner and supplier contributes to maintaining the reputation and credibility of Blue Diamond. By acting ethically every day, we strengthen the confidence of our customers, support sustainable business relationships and contribute to the long-term success of our company.

1. Scope

This Ethics Policy applies to all employees, managers, contractors, suppliers and business partners acting on behalf of Blue Diamond Deluxe Private Transports.

The policy governs all business activities undertaken by the company, including customer relations, supplier management, financial management, information management, commercial practices and compliance with applicable laws and regulations.

Blue Diamond is committed to conducting its business with integrity, transparency and accountability while complying with all applicable legal, regulatory and contractual obligations.

2. Our Guiding Principles

Blue Diamond believes that ethical business conduct is fundamental to sustainable business success. The following principles guide every business decision and define the standards expected from everyone acting on behalf of the company.

Integrity and Honesty

We conduct all business activities honestly, fairly and professionally.

We reject all forms of bribery, corruption, fraud, facilitation payments and unethical business practices. Decisions are made objectively and in the best interests of the company, our customers and our stakeholders.

Integrity is expected in every interaction, regardless of the commercial value or circumstances involved.

Transparency and Accountability

We believe that trust is built through openness and accountability.

We are committed to maintaining accurate records, transparent business practices and honest communication with customers, suppliers, business partners and public authorities.

Every employee is responsible for acting ethically and accepting responsibility for their decisions and actions.

Respect for Confidentiality and Information Security

Our customers entrust us with confidential information, and we take that responsibility seriously.

We are committed to protecting personal data, confidential business information and operational records through appropriate security measures and compliance with the General Data Protection Regulation (GDPR) and other applicable legislation.

Information is handled responsibly, accessed only when necessary and never disclosed without proper authorization.

Fair Business Relationships

We believe that long-term success is built on mutual trust and respect.

We conduct business fairly with customers, suppliers and business partners, promoting equal treatment, responsible procurement and fair competition.



We encourage our business partners to adopt ethical, environmental and social practices consistent with internationally recognized sustainability principles.

Continuous Improvement and Ethical Leadership

Ethics is an ongoing commitment rather than a one-time obligation.

We encourage employees to raise concerns, ask questions and report suspected misconduct without fear of retaliation.

Through continuous training, open communication and regular policy reviews, we strive to strengthen our ethical culture and continuously improve our governance practices.

3. Ethics Policy Objectives

Objective 1

Promote a culture of integrity by preventing corruption, bribery and conflicts of interest across all business activities.

To achieve this objective, Blue Diamond is committed to:

- Maintaining zero tolerance towards bribery, corruption, fraud, facilitation payments and any unethical business practices.
- Ensuring compliance with applicable anti-corruption legislation.
- Establishing clear rules regarding gifts, hospitality and business courtesies.
- Requiring employees to disclose and appropriately manage actual or potential conflicts of interest.
- Providing periodic awareness and training on ethical business conduct.
- Maintaining confidential reporting channels for suspected unethical behavior.
- Investigating reported concerns promptly, fairly and confidentially while implementing appropriate corrective actions whenever necessary.

Objective 2

Ensure responsible corporate governance by protecting confidential information, complying with applicable legislation and maintaining transparent business practices.

To achieve this objective, Blue Diamond is committed to:

- Complying with all applicable legal, regulatory and contractual obligations.

- Protecting confidential business information and personal data in accordance with the General Data Protection Regulation (GDPR).
 - Implementing appropriate information security measures to safeguard electronic and physical information assets.
 - Maintaining accurate, complete and transparent financial and operational records.
 - Conducting business communications honestly and professionally.
 - Periodically reviewing legal and regulatory requirements to ensure continued compliance.
-

Objective 3

Build responsible and sustainable business relationships by promoting ethical conduct, transparency and mutual trust throughout our value chain.

To achieve this objective, Blue Diamond is committed to:

- Conducting business fairly, transparently and professionally with customers, suppliers and business partners.
 - Integrating ethical, social and environmental considerations into supplier selection whenever feasible.
 - Encouraging suppliers and business partners to adopt responsible business practices aligned with internationally recognized sustainability principles.
 - Promoting fair competition and rejecting anti-competitive or unfair commercial practices.
 - Maintaining open dialogue with stakeholders to encourage continuous improvement in sustainability and ethical performance.
 - Periodically reviewing this Ethics Policy to ensure its continued effectiveness and alignment with evolving legal requirements and best practices.
-

4. Ethics Performance Indicators (KPIs)

Blue Diamond monitors the implementation of this policy through the following Key Performance Indicators:

KPI	Target	Monitoring Frequency
Employees receiving annual ethics awareness	100% of employees	Annual
Confirmed cases of bribery, corruption or fraud	Zero	Continuous
Confirmed conflicts of interest not properly disclosed or managed	Zero	Continuous
Confirmed breaches of confidentiality or personal data protection	Zero	Continuous
Ethics concerns reported through confidential channels investigated	100%	Continuous

5. Monitoring and Responsibilities

The implementation of this Ethics Policy is overseen by the Operations Director, who is responsible for promoting ethical leadership, ensuring compliance with applicable legislation, monitoring ethical performance and fostering a culture of integrity throughout the organization.

All employees are responsible for understanding and complying with this policy, acting honestly and professionally, protecting confidential information and immediately reporting any suspected unethical or unlawful conduct.

The effectiveness of this policy is monitored through periodic reviews of compliance activities, training records, stakeholder feedback, reported concerns and the Key Performance Indicators established within this policy.

Whenever opportunities for improvement are identified, appropriate corrective and preventive actions will be implemented to strengthen the company's ethical management system.

6. Policy Review

This Ethics Policy shall be reviewed at least once every year, or earlier whenever significant legal, regulatory, operational or organizational changes occur.

The annual review will evaluate:

- Progress towards the policy objectives.
- Achievement of established KPIs.
- Changes in applicable legislation and regulatory requirements.
- Results of ethics training and awareness activities.



- Reported ethical concerns and corrective actions implemented.
- Supplier engagement and responsible business practices.
- Opportunities to strengthen ethical governance and continuous improvement.

Any revisions to this policy shall be approved by the Operations Director and communicated to all employees and relevant stakeholders.

Approved by

Marco Fidalgo
Operations Director
Blue Diamond Deluxe Private Transports

Effective Date: January 2026

Next Scheduled Review: January 2027