



# ANIMAL WELFARE POLICY

October 2025



**#MakeTheDifference**

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# 01 Introduction - Purpose of the HBX Group Animal Welfare Policy

## A. Overview

The HBX Group Animal Welfare Policy (the Policy) outlines the key internal principles, systems, and controls to guide HBX Group International PLC and its subsidiaries (the Group) in promoting animal welfare across its operations and areas of influence. The Policy outlines the key steps and procedures which aim to:

- Promote respect and dignity for all animals involved in the tourism services we offer or support.
- Prevent animal exploitation and encourage conditions that

allow animals to exhibit natural behaviours.

- Raise awareness among guests and suppliers about the importance of animal welfare.
- Continuously review and improve animal welfare practices within our sphere of influence.

The Policy, adopted by the company's Senior Management Team (SMT) applies to the Group and encourages alignment among its partners. While HBX Group does not have full control over its entire value chain, it is committed to promoting responsible practices and engaging with stakeholders to support animal welfare. The SMT will oversee the implementation of the governance and procedures associated with this Policy.



## B. Document management

This Policy is jointly managed by the ESG Area and has been approved by Senior Management Team (SMT) on October 2025. The Policy will be reviewed and updated periodically (at least annually) or whenever there is a significant change in applicable law, regulation, or corporate governance best practice processes. Suggestions for amendments to the Policy should be directed to any of the Policy Owners.

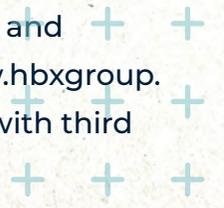
## C. Document history

As stated above, updates to the Policy may be made from time to time and will be issued as a revised version. The following table logs changes to the Policy or its appendices and allows the user to verify that the most updated version is being used.

Version No.	Revision Date	Revision Effective Date	Revision Version No.	Details of changes made
0.1	October 2025	October 2025	0.1	Approval

## D. Availability and access

This document is accessible to everyone in the Group and published on the Company's corporate website ([www.hbxgroup.com](http://www.hbxgroup.com)). There are no restrictions on sharing the Policy with third parties.



# 02 Application of the Policy

This policy applies to all partners of HBX Group who provide a tourism activity or service. It encompasses all types of nature-based tourism or animal activities, every kind of animal (species and domestic animal breed), and all countries of operation. Our safeguards and guidelines must therefore apply to animals kept in captivity, involved in performance or interactions, used for work, viewed in the wild, or subject to illegal wildlife trade.

It is very important that the requirements of animal welfare standards and any related rules or regulations issued by the relevant authorities are strictly followed. The procedures and instructions set out in this Policy are designed to achieve this.

Any breach of this Policy will result in immediate corrective action, which may include termination of partnerships.



# 03 Policy General Principles

HBX Group is committed to upholding and promoting the principles outlined by the World Organisation for Animal Health (WOAH) and the ABTA Animal Welfare Guidelines, which advocate the highest standards of animal welfare. While HBX Group does not exercise full control over its entire value chain, we are dedicated to identifying and addressing any potential breaches of these principles. We expect all commercial relationships and business partners to adhere to the standards set forth in this Policy, reinforcing our commitment to fostering a culture of respect, compassion, and responsibility towards animals across all areas of our operations.

## Respect and Dignity

We promote the dignified treatment of all animals in tourism services, ensuring proper living conditions, nutrition, veterinary care, and protection from pain and stress.

## No Exploitation

We do not support any form of animal exploitation and avoid activities that cause suffering and harm.

## Natural Behaviour

We promote animals' ability to express natural behaviours and discourage practices that force them to act against their instincts.

## Education and Awareness

We aim to raise awareness among our partners about the importance of animal welfare and promote responsible and ethical interactions with animals.

## Continuous Improvement

We continuously review and improve our standards, valuing feedback from guests and animal welfare experts.



# 04 Our levels of Human-Animal Interaction in Tourism Experiences

HBX Group has implemented a structured classification framework, hereinafter referred to as the “Four-Level System”, aligned with the principles established in this Animal Welfare Policy. This framework categorises all animal-related activities into four distinct levels, based on the nature and extent of human-animal interaction, ranging from practices considered responsible to those deemed unacceptable.

The purpose of this classification system is to facilitate the identification of experiences that meet HBX Group’s animal welfare standards, thereby enabling informed decision-making by internal teams, business partners, and customers. This system serves as a guiding tool to promote transparency, uphold ethical standards, and reinforce HBX Group’s ongoing commitment to the protection and welfare of animals across all business operations.

LEVEL	EXPERIENCE LEVEL	CHARACTERISTICS
0	Animal-Free Tourism	No animals involved, directly or indirectly. Activities focused on culture, gastronomy, nature, sports, or human wellness. Zero impact on wildlife or domesticated animals.
1	Ethical Wildlife Observation	No direct contact with wild or domesticated animals. Promotes observation in natural habitats without interference. Supports conservation and environmental education.
2	Controlled Interaction	Contact with animals under strict regulations. Animals are usually domesticated or rehabilitated. Requires professional supervision and ethical practices.
3	Experiences at Risk of Crossing Red Lines	Activities involving animals for entertainment or commercial purposes that may lack sufficient consideration for their welfare. These experiences often involve forced training, inadequate living conditions, or frequent and stressful direct contact with humans. Without proper safeguards, they pose a significant risk of breaching ethical standards for animal welfare.

# 05 **HBX Group's Expectations on Animal Welfare Practice**

As a travel intermediary, HBX Group does not have full control over its entire value chain, we are committed to promoting our animal welfare red lines across our network. We aim to support and prioritise the commercialisation and distribution of activities that align with these principles, and we will continue working with partners to encourage improvements in line with our guidelines.

We actively encourage ethical, humane, and high-standard interactions with animals, supporting a culture of respect and compassion for animals across the tourism value chain.

What We Expect from Our Suppliers:

## **Housing**

Animals should be provided with clean, spacious, and safe living environments that meet their specific needs. Enclosures should be designed to allow for natural behaviours and offer protection from extreme weather conditions.

## **Nutrition**

A balanced and species-appropriate diet should be provided.

Fresh water must be available at all times, and dietary needs should be reviewed and adjusted regularly.

## **Health Care**

Regular veterinary check-ups should be conducted to ensure animal health and well-being. Any signs of illness or injury should be addressed promptly by qualified professionals.

## **Enrichment**

Animals should have access to enrichment activities that stimulate them mentally and physically. This may include toys, problem-solving - challenge, and opportunities for social interaction with other animals.

## **Training**

Only positive reinforcement training methods should be used to encourage natural behaviours and ensure safe interactions with humans. Training should never involve punishment or coercion.

## **Wildlife Viewing**

Wildlife viewing practices should be managed to avoid causing distress or harm. This includes maintaining a safe distance, minimizing noise, and ensuring that viewing does not disrupt natural behaviours or habitats.

# 06 Standards of Guest Behaviours We Expect Our Suppliers to Promote

HBX Group is dedicated to promoting responsible and respectful, behaviour towards animals among travellers. We will encourage our partners who offer tourism services to actively foster attitudes of good conduct and awareness, ensuring that all interactions with animals are conducted ethically and with the utmost care. By collaborating with our partners, we aim to create a travel environment where the well-being of animals is prioritised and respected. Some of the behaviours to be promoted:

## Respect Boundaries

Guests should always respect the boundaries set by guides and staff. Do not attempt to touch, feed, or interact with animals unless explicitly permitted and supervised.

## Quiet and Calm

Maintaining a quiet and calm demeanour around animals to avoid causing them stress or fear. Loud noises and sudden movements should be minimized.



## Follow Instructions

Adhere to all instructions provided by guides and staff regarding interactions with animals. This includes maintaining a safe distance and following designated paths.

## No Flash Photography

Avoid using flash photography as it can disturb and stress animals. Use natural light or low-intensity lighting when taking photos.

## Do Not Feed Animals

Do not feed animals unless it is part of a supervised activity with appropriate food provided by the staff. Feeding animals unsuitable food can harm their health.

## Leave No Trace

Ensure that all litter is disposed of properly and do not leave any items behind that could harm animals or their habitats.

## Report Concerns

If you observe any behaviour or conditions that seem harmful to animals, report it to the staff immediately.

# 07 **Animal Protection Efforts**

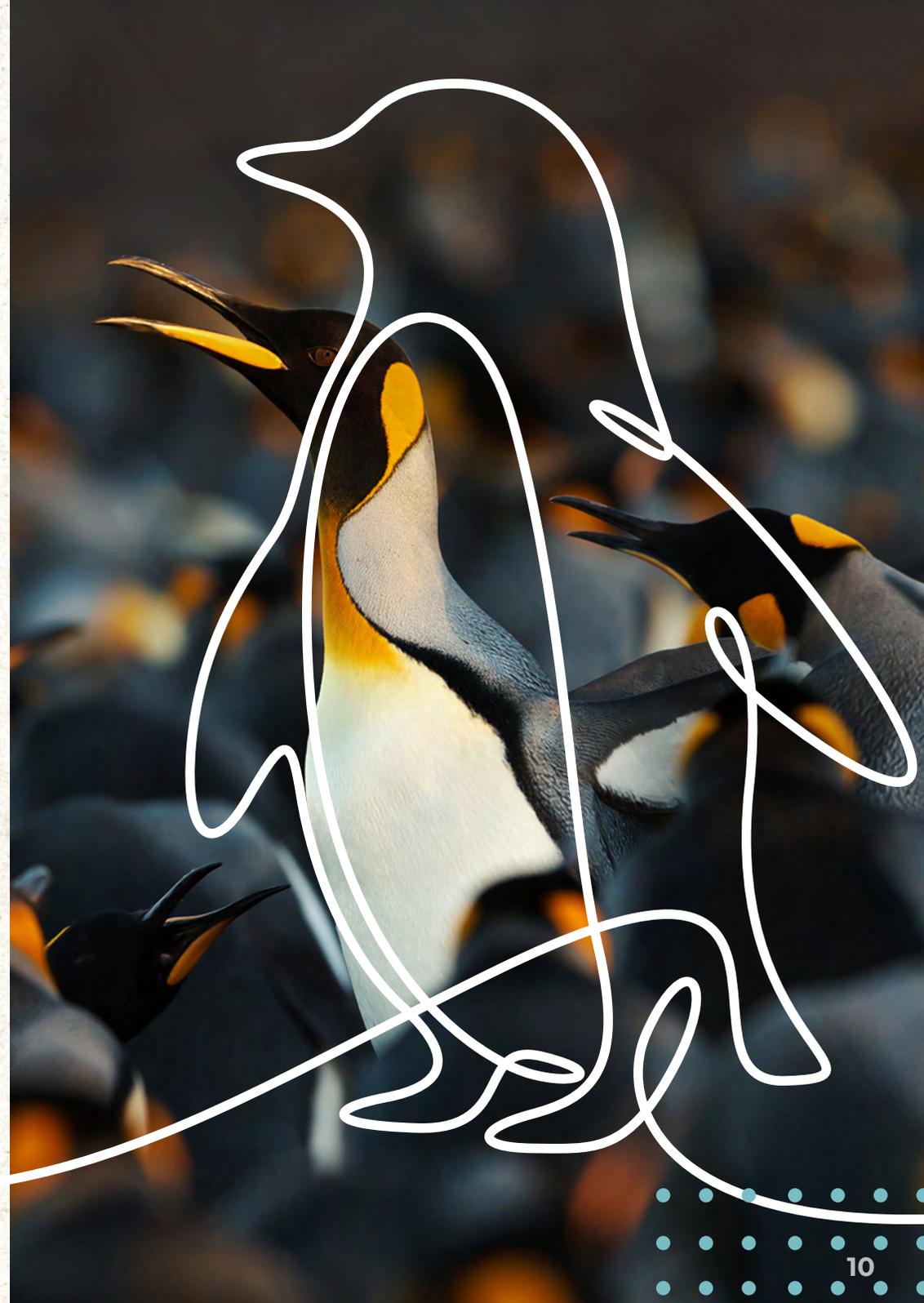
At HBX Group, we are dedicated to supporting animal rescue efforts as part of our commitment to animal welfare. Our rescue initiatives include:

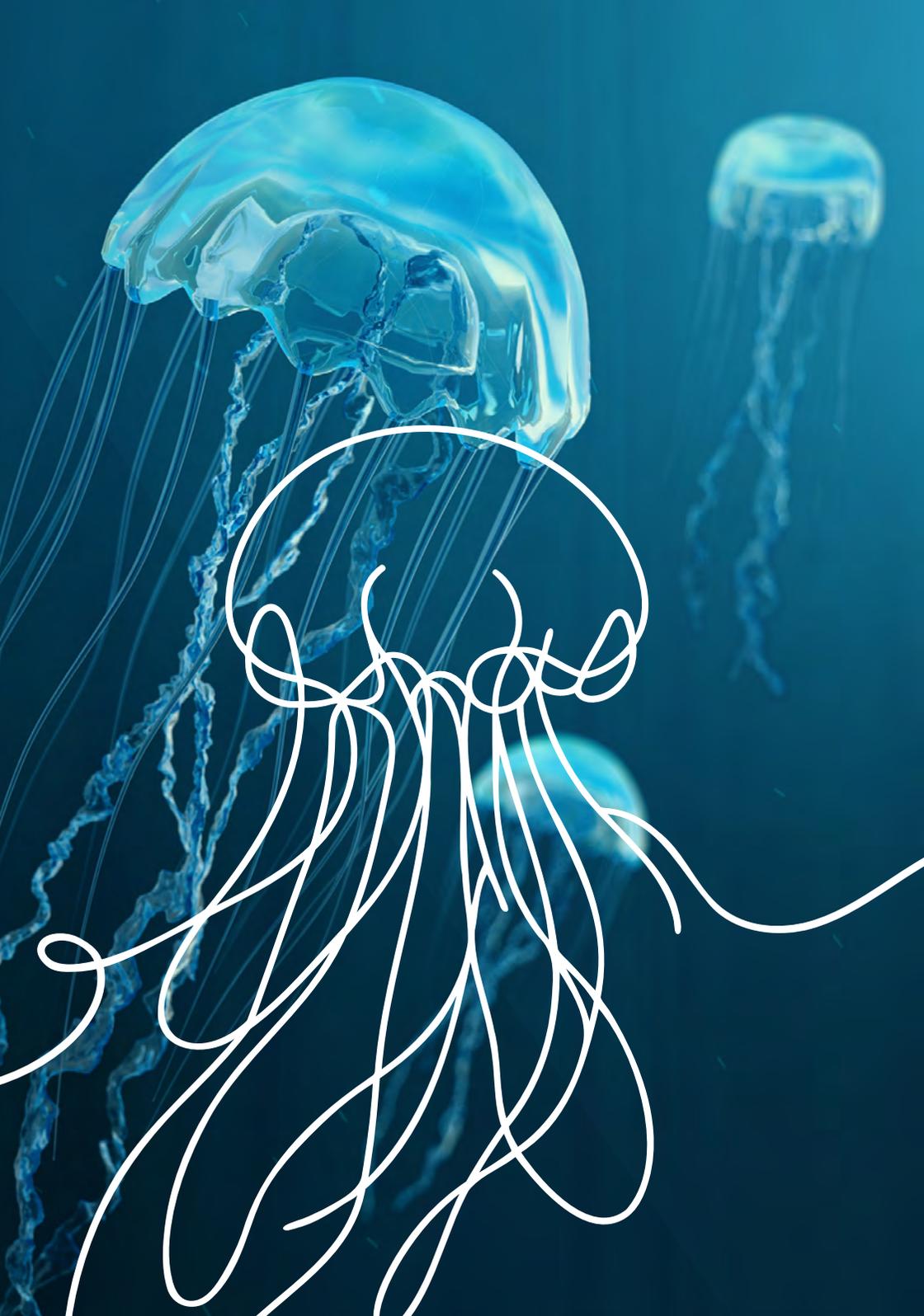
## **Partnerships with Rescue Organisations**

We collaborate with reputable animal rescue organisations to support their efforts in rescuing and rehabilitating animals in need. This includes providing financial support, resources, and volunteer assistance.

## **Public Awareness Campaigns**

We conduct public awareness campaigns to educate the community and our partners about the importance of animal rescue and the role they can play in supporting these efforts. This includes promoting responsible pet ownership and the benefits of adopting rescued animals.





## 08 Transparency

HBX Group is committed to offering complete, transparent, clear and truthful information when asked by its main stakeholders. In this regard, HBX Group consistently upholds responsible communication practices that prevent the manipulation of information, safeguarding both its integrity and reputation. We provide regular updates on our financial and non-financial performance, strategic plans, and social, ethical, and environmental conduct. Additionally, we publicly report our progress to the necessary governing bodies and our stakeholders.



# 09 Governance

For the management of its animal welfare policy and related actions the Group has implemented the following governance model:

The Board of Directors is responsible for approving the Animal Welfare Policy. The Executive Committee is responsible for approving the plan for the implementation of the policy and any actions arising from it.

The Global ESG Team, responsible for overseeing compliance and monitoring of this policy, will ensure alignment with the HBX Group's business strategy. In addition, together with the Experiences team, it will develop an action plan in line with the policy.

Accordingly, the Global ESG Team is responsible for drafting and amending this policy, which must be approved by the Board of Directors.

In addition, the Experiences team will be responsible for the implementation of the policy and its associated action plan.

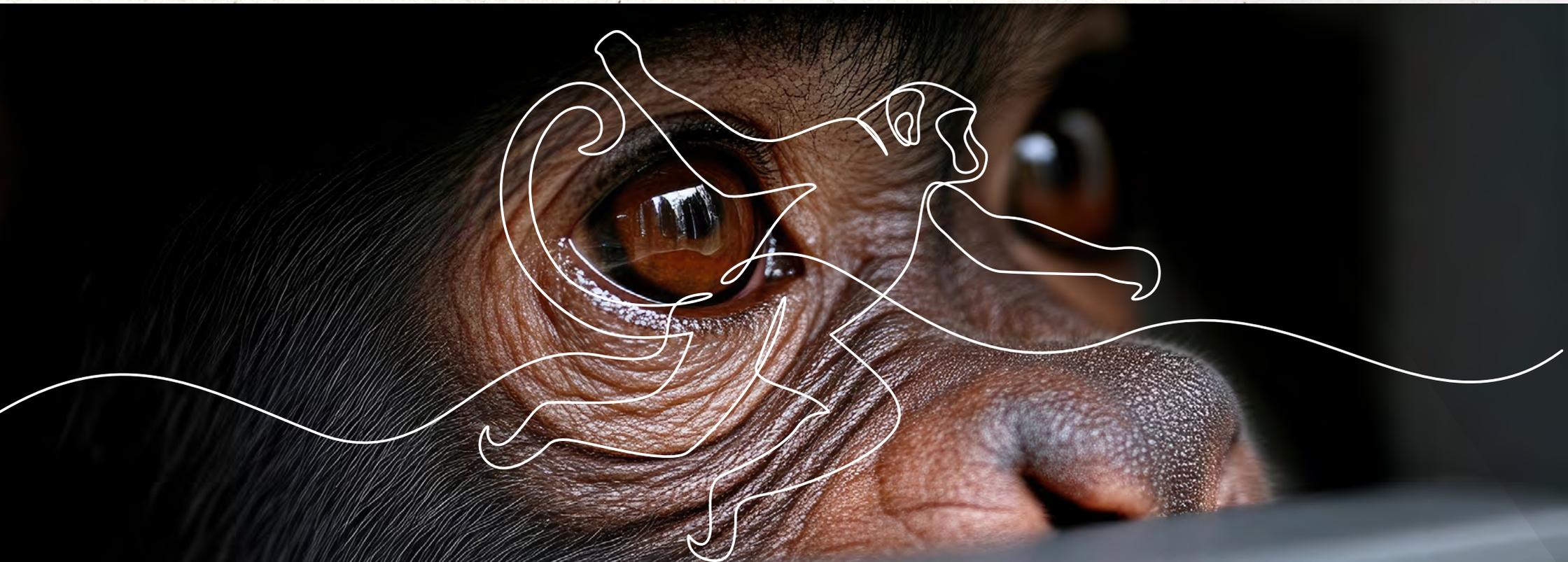
ROLE	RESPONSIBILITIES
Board of Directors	<ul style="list-style-type: none"><li>• Approving the Animal Welfare Policy</li></ul>
Senior Management Team	<ul style="list-style-type: none"><li>• Approve Animal welfare plan implementation.</li><li>• Approve annual plans.</li></ul>
Global ESG Team	<ul style="list-style-type: none"><li>• Global definition of the animal welfare action plan.</li><li>• Support the Experiences team in the improvement and adaptation of the plan to comply with the Animal Welfare Policy.</li><li>• Report progress</li></ul>
Experiences Team	<ul style="list-style-type: none"><li>• Manage and implement the policy and the action plan.</li><li>• Identification of cases of policy violations</li><li>• Collect data on the implementation of the policy and action plan.</li></ul>

# 10 Monitoring and Policy Breach

Any breach of this Policy must be reported as soon as possible to any of the Policy Owners, any member of the Disclosure Committee, or through our Help Line under the ESG section. HBX Group will promote monitoring mechanisms and periodic reviews to identify potential deviations, foster transparency, and support continuous improvement in the application of animal welfare principles by its suppliers.

As part of this monitoring, HBX Group may request evidence to verify compliance with the Policy, as well as conduct random audits when deemed necessary.

Failure to comply with this Policy may result in corrective actions, including the potential termination of the collaboration and service agreement with the supplier involved.



# Annex. Our Red Lines

HBX Group does not promote tourism activities that involve inadequate treatment of animals. The group's guidelines, aligned with the ABTA Animal Welfare Guidelines and the standards of the World Organisation for Animal Health (WOAH), aim to ensure that all commercialised experiences prioritize animal welfare and avoid practices that may cause harm or exploitation.

The activities not promoted by HBX Group are as follows:

## 1. Unacceptable practices involving animals in captive attractions:

- » Punishment or food deprivation.
- » Tourist contact or feeding of elephants, wild cats, crocodiles, great apes, bears, sloths, and other animals without proper barriers.
- » Canned hunting and ostrich riding.
- » Unlicensed zoos

## 2. Unacceptable practices involving animals in cultural events and activities:

- » Any form of animal fighting.
- » Bull running and certain rodeo events.
- » Ritual animal slaughter as part of tourism

## 3. Unacceptable practices involving animals in cultural events and activities:

- » Unregulated collection of animals and plants from the wild.
- » Trade and sale of endangered wildlife products.
- » Trophy hunting

