Travel Twitch DMC d.o.o.
Headquarters: Vladimira Rolovića F2, 85000 Bar, Montenegro
Branch: 40 Nouvelle Way, Boston, USA
PIB 03483029 · PDV 80/31-04973-4 · Tour operator licence no. 655
+382 67 035 255 · +1 617 780 4728 · discover@thetraveltwitch.com
www.thetraveltwitch.com

COMPANY POLICY

Sustainability Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o.: headquarters in Bar, Montenegro, and branch in Boston, USA. All staff, all programmes and all partners and suppliers
Policy owner	Ivan Perčobić, Executive Director
Approved by	Ivan Perčobić, Executive Director (responsible person)
Review	Every October, or sooner when our operations or the law change
Available to	All staff on SharePoint; partners, suppliers and the public as described in section 11

1. Who we are

Travel Twitch DMC d.o.o. is a destination management company with its headquarters in Bar, Montenegro, and a branch in Boston, USA. The company is co-owned by Rade Bogavac, CEO, and Ivan Perčobić, Executive Director. We were founded by locals, to give our guests a lifetime experience of the Adriatic and an authentic insight into the culture of Montenegro and Croatia. We design and operate tailor-made journeys, group programmes and incentive and corporate travel in Montenegro, Croatia, Slovenia, Albania and Bosnia and Herzegovina. Our clients are travel agents, tour operators and private and corporate travellers, many of them from North America and Europe.

We are an online agency. Our team works remotely, our documents are kept online, and vouchers, rooming lists and programmes are sent to our partners and clients digitally. Our main impacts, positive and negative, are therefore in the journeys we design and in the partners and suppliers we work with in the destinations.

2. Our mission

Private, purposeful and deeply Adriatic.

Our mission is to create private, purposeful journeys through Montenegro, Croatia and the wider Adriatic that connect our guests with local people, culture and nature, while protecting the places we love and making sure that the communities who host our guests benefit from tourism.

We publish our mission statement on our website, www.thetraveltwitch.com.

3. Purpose and scope

This policy sets out our commitment to sustainable tourism and how we manage it. It is the umbrella for all our other sustainability policies (section 6).

It covers:

- our own operations and team, in Bar and in Boston;
- the programmes and products we design and sell;

- our supply chain: partner agencies, accommodation, transport, excursions, guides, restaurants and venues;
- our communication with clients and guests.

4. Our commitments

The management of Travel Twitch DMC fully supports this policy. We commit to reduce the negative and increase the positive social, economic and environmental impacts of our business. In particular, we commit to:

1. **Comply with the law** in every country where we operate, and apply the higher standard where this policy goes further.
2. **Respect human rights and fair labour conditions** for our own staff and throughout our supply chain, with no child labour and no forced labour (Human Resources & Social Policy).
3. **Protect children** from sexual exploitation, and end cooperation with any partner that does not take adequate measures to prevent it.
4. **Keep our staff and guests safe**, with clear risk assessment, emergency and crisis management procedures (Health, Safety & Crisis Management Policy).
5. **Deliver quality** that matches what we promise, and act on feedback and complaints (Customer Communication Policy).
6. **Reduce our environmental footprint** by working digitally, avoiding printing and waste, and keeping business travel to a minimum (Environmental Policy).
7. **Work with responsible partners and suppliers**, and introduce our Partner & Supplier Sustainability Code of Conduct with all of them.
8. **Prefer sustainable products**: low-impact transport, certified and locally owned accommodation, and excursions that benefit local communities and nature.
9. **Protect animals, nature and cultural heritage**, with no captive wild animal attractions and no trade in protected species.
10. **Act with integrity**: no bribery or corruption, honest marketing and transparent communication.
11. **Improve continuously**, with clear objectives, an action plan and regular monitoring and reporting.

5. Responsibilities

Role	Person	Responsibility
CEO and Co-owner	Rade Bogavac	Supports this policy and provides the time and resources to implement it
Executive Director and Co-owner, responsible person and Travelife coordinator	Ivan Perčobić	Approves and signs this policy, has overall responsibility for sustainability, is the registered Travelife coordinator, approves the action plan and leads the yearly review
Head of Growth and Office Manager	Dragana Krivokapić	Applies our sustainability requirements in relations and contracts with suppliers and local partners, in FAM trips and in improving our programmes; coordinates internal processes and marketing, including accurate sustainability communication
Sustainability implementation	Tijana Raičević, Project Manager	Day-to-day implementation, Travelife reporting, keeps policies, registers and records on SharePoint
Project Manager, events and incentives	Damir Zagora	Applies our policies when designing proposals, events and incentive programmes and when choosing venues and suppliers

Role	Person	Responsibility
Travel Advisor	Lana Joketić	Applies our policies when preparing offers and programmes, advises clients on sustainable options and, as they are introduced in 2027, sends guests our Responsible travel tips
All staff	Everyone who works for us	Follow this policy, suggest improvements and report concerns

Our Sustainability Coordinator has completed the Travelife basic training (Tour Operators & Sustainability and Sustainability Management), and the Project Manager will complete it in 2027, so that sustainability is managed with the right knowledge.

6. Our policy framework

Policy or document	What it covers
Sustainability Policy (this policy)	Mission, commitments, management, objectives, monitoring and reporting, destinations
Human Resources & Social Policy	Labour conditions, human rights, equal opportunities, child labour, grievances, training
Health, Safety & Crisis Management Policy	Health and safety of staff and guests, emergencies and crisis management
Environmental Policy	Our own environmental footprint as an online agency working remotely
Inbound Partner Agency Sustainability Policy	Selection and improvement of partner agencies
Partner & Supplier Sustainability Code of Conduct	Minimum standards for all partners and suppliers
Sustainable Transport Policy	Transport to and within our destinations
Sustainable Accommodation Policy	Selection and improvement of accommodation
Sustainable Excursions & Animal Welfare Policy	Excursions, animal welfare and wildlife
Tour Leaders, Guides & Local Representatives Policy	Working conditions, qualifications and role of guides
Customer Communication Policy	Privacy, marketing, information for guests, satisfaction and complaints

7. Baseline, objectives and action plan

Baseline. In 2026 we completed a baseline assessment of our compliance with the Travelife standard for tour operators in the Travelife reporting system. It shows where we already meet the standard and where we need to improve.

Action plan. Based on the baseline, our action plan in the Travelife system sets targets, actions, responsibilities and timelines. Our main long-term objectives are:

Objective	Target	Timeline	Responsible
Travelife Partner award	Award received	2027	Executive Director
Code of Conduct sent to all partners and suppliers	100%	Before the 2027 season	Head of Growth and Office Manager
Written agreements with key partner agencies	100% of key partners	2027	Executive Director and Head of Growth

Objective	Target	Timeline	Responsible
Sustainability addendum in accommodation contracts	100% of new and renewed contracts	2027	Head of Growth
Share of certified accommodation used	+3 percentage points a year	2027–2029	Project Manager
Responsible travel tips sent to guests	100% of guests	2027	Travel Advisor and Project Managers
Detailed codes shared with providers of sensitive excursions	100% of providers	2027	Project Manager
Sustainability training for guides and local representatives	Key guides trained	2027–2028	Project Manager
Risk Assessment Act prepared with a licensed occupational safety provider	Act in place	Early 2027	Executive Director
First aid training for operations staff	Operations staff trained	2027	Executive Director
Yearly employee satisfaction survey	Every November	From 2026	Executive Director
Sustainability questions in client feedback	Included	2027	Head of Growth
Printed documents and brochures	0	Ongoing	All staff
Old electronic equipment reused or handed to authorised collectors	100%	Ongoing	All staff
Public sustainability report on our website	Every two years	First in 2027	Executive Director

8. Involving and informing our team

Our team is the driver of our progress, and management involves everyone in developing and implementing the action plan.

- Sustainability is discussed at our regular online team meetings. Decisions and responsibilities are recorded in a follow-up email.
- Every team member can suggest improvements at any time, at team meetings or directly to a director.
- New team members receive this policy and the related policies at onboarding.
- All policies are available to the team on SharePoint.
- At least once a year the team is updated on our sustainability results, progress on the action plan and new developments.

9. Destinations

As a DMC, our main destination is Montenegro and its neighbouring countries.

- **Choosing new destinations.** When we add a new area or place to our programmes, we consider its sustainability: whether it can receive more visitors without overcrowding, whether it has basic infrastructure such as waste collection, and whether local people benefit from the visit.
- **Less-visited areas.** Besides the busy coast, we offer less-visited areas, such as northern Montenegro, the villages around Skadar Lake and Stari Bar, to spread visitors and income.
- **Accessibility.** We consider whether new areas can be reached by more sustainable transport, such as the Belgrade–Bar railway, ferries or on foot.

- **Protected areas.** We include national parks and protected areas, such as Durmitor, Biogradska Gora, Lovćen and Skadar Lake, in our programmes, visit them with licensed local guides who follow park rules and codes of conduct, and always pay the entrance fees, which support their management.
- **Local economy.** We include local family producers, wineries and restaurants in our programmes, and prefer accommodation that serves local food.
- **Forbidden souvenirs.** We never promote or sell souvenirs made from threatened plants or animals, or historic and archaeological artefacts. We will inform our suppliers through our Code of Conduct and our guests through our Responsible travel tips, both being introduced in 2027.

10. Collaboration and exchange

We are a member of Travelife for Tour Operators and work with our Travelife coach on our sustainability journey. We are not yet active in external sustainability forums or working groups. As next steps, we will share our sustainability requirements with our partner agencies and suppliers through our Partner & Supplier Sustainability Code of Conduct before the 2027 season, share good practice via the Travelife website, and join relevant initiatives with other tour operators and tourism organisations that support sustainable tourism in our destinations.

11. Communication of this policy

- **Staff:** at onboarding, on SharePoint and at team meetings.
- **Partners and suppliers:** through our Partner & Supplier Sustainability Code of Conduct, which summarises our requirements and which we are introducing with all partners and suppliers before the 2027 season.
- **Clients and the public:** our mission statement is published on our website, www.thetraveltwitch.com, and we will publish this policy there as well.

12. Monitoring, evaluation and reporting

Yearly review. Every October, the Executive Director and the Project Manager review:

- progress on the objectives in section 7 and on the action plan;
- our registers of partner agencies, accommodation and sensitive excursions;
- incidents, complaints and feedback from staff, guests and partners;
- changes in the law and in the Travelife standard.

The results are discussed with the team, and the action plan and this policy are updated where needed.

Quarterly check. Every quarter, the Project Manager checks the status of all action plan tasks and records progress and problems. They are discussed at the next team meeting, and responsibilities or deadlines are adjusted where needed.

Travelife reporting. We report our progress through the Travelife reporting system at least every two years.

Public reporting. We publish the key results of our sustainability work on our website at least every two years.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

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COMPANY POLICY

Human Resources & Social Policy

Version 1.0

Policy information	Details
Applies to	All staff of Travel Twitch DMC d.o.o.: headquarters in Bar, Montenegro, and branch in Boston, USA
Policy owner	Ivan Perčobić, Executive Director
Approved by	Ivan Perčobić, Executive Director (responsible person)
Review	Every October, or sooner when the law or collective agreements change
Available to	All staff on SharePoint, and at onboarding

1. Purpose, scope and commitment

Travel Twitch DMC d.o.o. commits to fair, legal and safe employment for everyone who works for us, and this policy sets the minimum standards that apply from the date of approval in section 13.

Company: Travel Twitch DMC d.o.o., headquarters at Vladimira Rolovića F2, 85000 Bar, Montenegro · PIB 03483029 · Tour operator licence no. 655 · Activity code 79.11 · branch in Boston, Massachusetts, USA. Our team works remotely.

Who it covers:

- All employees: permanent, fixed-term, part-time and seasonal.
- Workers assigned to us by a licensed temporary employment agency, for the time they work for us.
- Interns and trainees.
- Freelance guides, drivers and other contractors, as conduct expectations confirmed in writing for each assignment.

Legal framework. For staff employed in Montenegro we comply with Montenegrin law, and we apply the higher standard where this policy goes further. Staff of our Boston branch are covered by the same principles; where this policy refers to Montenegrin law, the corresponding US federal law and the law of Massachusetts apply to them.

- Labour Law (Official Gazette of Montenegro 74/19, as amended, incl. 86/24)
- General Collective Agreement (Official Gazette 150/22) and the Branch Collective Agreement for Tourism and Hospitality (2024)
- Law on Occupational Safety and Health (Official Gazette 34/14, 44/18, 84/24)
- Law on Prohibition of Harassment at Work (Official Gazette 30/12, 54/16, 84/24)
- Law on the Prohibition of Discrimination, Law on Gender Equality, Law on Professional Rehabilitation and Employment of Persons with Disabilities

International standards. We respect the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Convention on the Rights of the Child, and the ILO fundamental conventions ratified by Montenegro (No. 29, 87, 98, 100, 105, 111, 138 and 182).

This policy implements the Travelife criteria on social policy and human rights (2.1–2.22). Health and safety is covered in more detail in the separate *Health, Safety & Crisis Management Policy*.

2. Freedom of association and collective agreements

Every employee may freely form or join a trade union, be represented by it and bargain collectively, and the company will never interfere with this right.

- No employee is disadvantaged, transferred, disciplined or dismissed for union membership or union activity (Labour Law, Art. 17).
- Union representatives may meet staff and receive the information and time off the law provides.
- Employees may also choose a staff representative to speak for them (section 9).

Collective agreements. The General Collective Agreement (Official Gazette 150/22) applies to all our employees. We apply in particular:

Item	Minimum we apply
Overtime	+40% of the hourly rate
Night work (22:00–06:00)	+40% of the hourly rate
Work on a public holiday	+150% of the hourly rate
Paid leave: own marriage	5 working days
Paid leave: birth of a child	3 working days
Paid leave: serious illness of a close family member	7 working days

We use the Branch Collective Agreement for Tourism and Hospitality, signed in June 2024 by the Union of Tourism and Hospitality of Montenegro and the Montenegrin Employers Federation, as our sector benchmark. Where it is more favourable to employees, we apply it. Management checks for changes to both agreements once a year during the policy review.

3. Voluntary employment, recruitment and contracts

All work at Travel Twitch DMC is freely chosen, and every employee has a signed written contract before the first working day.

No forced labour. Employees may resign at any time by giving the notice in their contract and the Labour Law, without any penalty. We never:

- keep passports, ID cards, diplomas, work permits or other personal documents;
- withhold wages, ask for deposits or charge recruitment fees;
- use debt bondage, prison labour or threats of any kind;
- require overtime beyond the legal limits or as a condition of keeping the job.

Recruitment. Each vacancy has a written job description. Candidates are assessed on skills and experience only (section 6). We check age and the right to work from an ID document, and foreign nationals receive a work permit before they start.

Employment contracts. Each contract is signed in writing before work starts (Labour Law, Art. 30) and states (Art. 31):

1. job title and a description of duties;
2. place of work;
3. type and duration of employment (permanent or fixed-term) and any probation period;

4. working hours;
5. salary, its components and payment dates;
6. annual leave;
7. notice period and reference to the applicable collective agreements.

The employee receives a signed copy and is registered for compulsory social insurance from the first working day. Personnel files are kept confidential in line with the Law on Personal Data Protection.

Agency workers. When we use a licensed temporary employment agency, the worker's employment contract is with the agency. As the user company we:

- give the worker written instructions on duties, place of work and working hours on day one;
- apply the same working hours, rest, safety measures and training as for our own staff;
- keep time records and send them to the agency each month so wages are paid correctly.

Contractors. Before each assignment, freelance guides, drivers, skippers and photographers receive a written confirmation, by service agreement or email, of their tasks, the programme, working hours and fee. Our Partner & Supplier Sustainability Code of Conduct, which we are introducing, will also be shared with them. We do not use service agreements to replace employment for permanent, full-time roles.

Ending employment. Employment ends only on the grounds and with the notice the Labour Law sets. Union activity, a complaint, pregnancy, family leave or illness is never a reason for dismissal.

4. Pay, working hours and overtime

No one at Travel Twitch DMC earns less than the statutory minimum wage, and we set salaries to provide a living wage.

Minimum and living wage.

- Statutory minimum wage since 1 October 2024 (Labour Law amendments, Official Gazette 86/24): EUR 600 per month for jobs requiring education up to level V, EUR 800 per month for level VI and above.
- Each January, management and accounting review all salaries against the statutory minimum, the national average net wage published by MONSTAT and the WageIndicator living wage estimate for Montenegro.
- We will apply any new statutory minimum wage from its effective date, including the new model announced for 2027.
- Women and men receive equal pay for work of equal value.

Payment. Salaries are paid monthly by bank transfer within the legal deadline, with a payslip showing gross pay, every deduction and net pay. Deductions are made only where the law requires them or the employee agreed in writing. We never use fines or pay cuts as a disciplinary measure.

Working hours and rest.

- Full-time work is 40 hours per week (Labour Law, Art. 61), Monday to Friday. Our whole team works remotely.
- Outside the high season, the team works in two shifts, 09:00–17:00 and 12:00–20:00. Weekends are free, and no one is expected to be available on Saturdays and Sundays.
- Employees take a paid break of at least 30 minutes each working day.
- Employees have at least 12 hours of rest between two working days and at least 24 hours of uninterrupted weekly rest.
- Working time is recorded for every employee and agency worker.

Overtime.

1. Overtime is an exception and is approved in advance by the Executive Director or the CEO.

2. It stays within the legal limits: no more than 50 hours in any week and no more than 48 hours per week on average over four months (Art. 64).
3. Every overtime hour is recorded.
4. The employee chooses between pay at +40% of the hourly rate or paid time off in lieu.
5. Work on a public holiday is paid at +150%, night work at +40%.

High season. From May to October we offer 24/7 support to guests on tour. On-call duty is planned in a rota so that no one is on call two weekends in a row, and it is compensated with days off after the season.

5. Insurance, leave and sick leave

Every employee is covered by public health insurance and work-injury insurance from day one and receives at least 20 working days of paid annual leave.

Medical insurance. Each employee is registered for compulsory social insurance with the Tax Administration from the first working day. This gives the employee and dependent family members full cover under the public health insurance system (Health Insurance Fund of Montenegro). Since 1 January 2022 health insurance is financed from the state budget; the company pays all other mandatory contributions and taxes on salaries on time.

Work-injury insurance. As the Law on Occupational Safety and Health requires (Art. 30), all employees are insured against work injuries, occupational diseases and work-related illness, and the company pays the full premium.

Annual leave.

- At least 20 working days per calendar year (Labour Law, Art. 81), increased as set in the employment contract and the General Collective Agreement.
- Employees who join or leave during the year receive 1/12 of their leave for each month worked.
- When leave is split, the first part lasts at least 10 consecutive working days.
- The leave plan for the year is agreed with each employee early in the year; longer breaks are encouraged in the low season (November–April).
- All public holidays in Montenegro are paid days off.

Sick leave. An employee who is ill informs the manager the same day and submits a doctor's certificate within 3 days (Labour Law, Art. 90). The company pays wage compensation for the first 60 days of absence; after that the Health Insurance Fund pays. Illness is never a reason for dismissal or any other disadvantage.

Family leave. Pregnancy, maternity, paternity and parental leave are granted as the law provides, and employees are protected from dismissal during pregnancy and maternity leave. Other paid leave for personal circumstances follows the General Collective Agreement (section 2).

Remote and flexible work. Our whole team works remotely. Where the role allows, employees may agree flexible start and end times with the Executive Director.

6. Equal opportunities, respect at work and persons with disabilities

Decisions on recruitment, pay, working conditions, training, promotion and dismissal are based only on qualifications, skills and performance.

Prohibited grounds. We do not tolerate direct or indirect discrimination (Labour Law, Art. 7–8) based on gender or gender identity, age, nationality, residency, ethnic origin, race, colour, language, religion or belief, disability, health condition, sexual orientation, marital or family status, pregnancy, political opinion, trade union membership or any other personal characteristic.

In practice:

- Job ads use neutral wording and state that we welcome all qualified candidates, including persons with disabilities.
- All candidates for a role answer the same core interview questions, and the reason for each hiring decision is noted.
- Each year, during the salary review, management compares pay for the same roles to confirm equal pay for work of equal value.
- Training and promotion are open to every employee (section 12).

Harassment and mobbing. Harassment, sexual harassment, bullying and mobbing are forbidden. Before starting work, each employee receives written information on their rights and duties under the Law on Prohibition of Harassment at Work (Art. 7). Complaints follow section 8, and no one is penalised for reporting in good faith.

Persons with disabilities. We do not currently employ persons with disabilities. As a small company we have no legal quota, but we commit to inclusive employment:

- we assess candidates with disabilities on their abilities and adapt the workplace, equipment and hours where reasonable;
- because we work fully remotely, our roles can easily be adapted;
- when recruiting, we contact the Employment Agency of Montenegro, which supports and subsidises the employment of persons with disabilities.

7. Child labour and young workers

Travel Twitch DMC does not employ children: the minimum age for any regular job with us is 18.

- We never employ anyone under 15, the legal minimum age (Labour Law, Art. 20), and never anyone of any age still in compulsory schooling.
- Age is checked from an ID document during recruitment, and a copy is kept in the personnel file.
- A young person aged 15–17 may join us only for a student internship or summer work, with the written consent of a parent or guardian and a medical certificate (Art. 22).
- Young workers do light, non-hazardous tasks only, with shorter hours agreed in writing, never during school hours, never at night, never overtime, and never driving, boat work or heavy lifting.

These rules follow the Labour Law, ILO Conventions No. 138 and 182 and the UN Convention on the Rights of the Child, applying whichever gives the young person the most protection.

Suppliers and destinations. Our Partner & Supplier Sustainability Code of Conduct, which we are introducing with all our partners and suppliers, prohibits child labour and any form of sexual exploitation of children. Staff who see a child at risk on tour report it at once to the Executive Director, who informs the police (122) or the Centre for Social Work.

8. Employee grievance procedure

Any employee, agency worker or intern can raise a complaint and receives a written answer within 8 working days.

What can be raised: pay, working hours, workload, leave, safety, treatment by a colleague or manager, discrimination, harassment or any other work issue.

How to raise it: verbally or in writing (Annex C), by phone, email or Microsoft Teams, to the direct manager, or to the CEO or the Executive Director if the complaint concerns the manager.

Steps:

1. The person receiving the complaint confirms receipt within 2 working days and records it in the grievance log.
2. The case is reviewed confidentially. The employee is invited to a meeting and may bring a colleague or union representative.
3. A written answer with the outcome and any action is given within 8 working days (up to 15 for complex cases, with the employee told why).
4. If the employee is not satisfied, they may appeal within 8 days to the other director (CEO or Executive Director), who answers within 8 working days.
5. One month later, the manager checks with the employee that the solution works and closes the case in the log.

Harassment and mobbing. These complaints are handled under the Law on Prohibition of Harassment at Work (Official Gazette 30/12, 54/16, 84/24). As a company with fewer than 30 employees, a mediator is agreed with the parties. The procedure is urgent and confidential, starts within 3 days and ends within 8 days (at most 30). The employee may also turn to the Agency for Peaceful Settlement of Labour Disputes or the court within 15 days of the outcome.

Outside routes. Employees may contact the Labour Inspectorate, the Agency for Peaceful Settlement of Labour Disputes or a trade union at any time.

No retaliation. No one is disadvantaged for raising a complaint or giving evidence in good faith. The grievance log is kept for 3 years and reviewed by management once a year, without names, to spot recurring issues.

9. Representation and communication with management

Every staff member can raise employment issues directly with the two co-owners and directors, Rade Bogavac and Ivan Perčobić, and each issue raised is logged and followed up.

- **Open door.** The CEO (Rade Bogavac) and the Executive Director (Ivan Perčobić) are available to every employee by phone, email or Microsoft Teams.
- **Team meetings.** We hold regular online team meetings and short check-ins, led by the Head of Growth and Office Manager, Dragana Krivokapić. Issues raised there are recorded in a follow-up email with the decisions and the person responsible, as practised since August 2026.
- **One-to-one review.** Each employee has an annual review with a director covering workload, working conditions, pay and development.
- **Staff representative.** Employees may elect a colleague to raise issues on behalf of the team; the representative is protected like any union member (section 2).

Follow-up. Issues raised are entered in the employee issues log with an owner, a deadline and a status. Management reports progress at the next team meeting, and closed issues are confirmed with the person who raised them.

10. Disciplinary procedure

Discipline at Travel Twitch DMC is fair, step by step and documented, and every employee hears the allegation and can respond before any measure is taken.

Principles. Each case is judged on facts, the measure fits the seriousness of the breach, and similar cases are treated alike. Every employee confirms at onboarding that they have read this procedure (Annex D).

Steps:

1. **Informal conversation.** The manager explains the problem and agrees how to fix it. Nothing goes on file.
2. **Verbal warning.** For a repeated or more serious problem, noted in the personnel file.

3. **Written warning.** States the breach, the improvement expected and a review date (normally 3 months).
4. **Termination.** Only for serious misconduct or a breach repeated after a written warning, on the grounds and with the procedure the Labour Law sets.

Before any written measure the employee receives the allegation in writing, has at least 3 working days to respond and may be accompanied by a colleague or union representative.

Serious misconduct includes violence, theft or fraud, harassment or discrimination, endangering the safety of guests or colleagues, and any involvement in the exploitation of children. It may lead to termination without earlier warnings, always following the Labour Law.

Never used: fines or salary deductions, physical or verbal abuse, public humiliation, or withholding documents.

Appeal. The employee may appeal within 8 days to the other director, and may also turn to the Agency for Peaceful Settlement of Labour Disputes or the court.

11. Employee satisfaction

We measure employee satisfaction once a year with an anonymous survey, every November after the high season, starting in November 2026.

1. The Executive Director sends the survey (Annex A) as an anonymous online form to all employees, agency workers and interns; it stays open for 2 weeks.
2. The Project Manager summarises the results by theme, without names, and compares them with the previous year.
3. Results are discussed with the whole team at the December team meeting.
4. Management agrees 2–3 improvement actions, each with an owner and a deadline, and records them in the employee issues log (section 9).
5. Progress is reported at team meetings, and the next survey checks whether the actions worked.

Suggestions are welcome at any time at team meetings or directly to a director. Employees who leave are offered a short exit conversation, and what we learn feeds into the next review.

12. Training, personal development and internships

Every staff member receives training on their role, rights and responsibilities at onboarding and at least once a year, during working hours and at the company's expense.

Annual training plan (details in Annex B):

Topic	Who	When
Onboarding: role, SOPs, New Employee Onboarding Checklist	New staff, agency workers, interns	First week
Employee rights: this policy, grievance and disciplinary procedures, anti-discrimination, anti-harassment	All staff	Onboarding + yearly refresher
Occupational safety, including safe computer work at home (legal requirement)	All staff	Onboarding + as the risk assessment requires
First aid (planned)	Operations staff	From 2027, refreshed every 3 years
Crisis management and incident reporting	All operations staff	Each April, before the season
Sustainability, human rights and child protection (Travelife)	All staff	Yearly
Local culture, heritage and respectful behaviour towards host communities	Guest-facing staff	Yearly

Topic	Who	When
Quality, customer service and products (fam trips, supplier visits)	Sales and operations	During the year

Every session is recorded in the training register (Annex B), with date, topic, trainer, participants and proof of attendance.

Personal development. All staff have equal access to development, whatever their role, gender or contract type.

- Each employee agrees a personal development plan with a director in the annual review.
- The company pays for agreed external courses and certifications, such as languages, guiding licences, luxury travel or destination training and digital skills.
- Staff join trade fairs, fam trips and site inspections, rotate between sales, operations and guest services, and learn from senior colleagues.
- Internal vacancies are offered to existing staff first.

Internships. We offer internships to students of tourism, hospitality, economics and languages, in cooperation with universities and schools. Each intern has:

- a written internship agreement with learning goals, hours and duration;
- a named mentor and a weekly check-in;
- a certificate and reference letter at the end.

Interns never replace employees. Interns under 18 follow section 7.

13. Responsibilities, review and approval

The Executive Director is the responsible person for this policy and implements it. The policy is reviewed every October or sooner when the law changes.

Role	Responsibility
CEO and Co-owner – Rade Bogavac	Supports the policy and provides resources
Executive Director and Co-owner, responsible person and Travelife coordinator – Ivan Perčobić	Approves and implements the policy, final decision on appeals, keeps the grievance and issues logs, runs the satisfaction survey
Head of Growth and Office Manager – Dragana Krivokapić	Leads team meetings and check-ins, coordinates administrative processes and the cooperation between team members, finance and operations, and keeps records of internal processes
Project Manager – Tijana Raičević	Supports Travelife reporting, keeps the training register and policy records
Accounting – Marija Lončarević	Payroll, contributions, minimum-wage check, insurance records
All staff	Follow the policy and raise concerns

Communication. Every employee, agency worker and intern receives this policy at onboarding and signs the acknowledgement (Annex D). The current version is stored on SharePoint (General Company Files) and explained at the yearly refresher training.

Review. Management reviews the policy every October, after a change in the law or collective agreements, and after any serious complaint. Changes are recorded below.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Employee satisfaction survey

Anonymous; answer each statement from 1 (strongly disagree) to 5 (strongly agree).

#	Statement	Score 1–5
1	My workload is manageable, including in high season.	
2	My working hours, overtime and on-call duty are fair and correctly paid.	
3	My salary is fair for the work I do.	
4	I can take my annual leave when I need it.	
5	I feel safe at work, when working from home and on tour.	
6	I know what to do in an accident or emergency.	
7	I am treated with respect by managers and colleagues.	
8	I can raise a problem with management without fear.	
9	When I raise a problem, it is followed up.	
10	I receive the training I need for my job.	
11	I have opportunities to learn and develop.	
12	I understand how our work supports sustainable tourism.	
13	Overall, I am satisfied working at Travel Twitch DMC.	

Open questions:

1. What is the best thing about working here?
2. What one thing should we change first?
3. Any other comments or suggestions?

Annex B – Training plan 2026–2027 and training register

Training plan

Training	Participants	Planned	Provider
HR & Social Policy and Health, Safety & Crisis Policy briefing	All staff	November 2026	Executive Director (internal)
Occupational safety, including safe computer work at home	All staff	2027	Licensed OSH provider
First aid course	Operations staff	2027	Red Cross of Montenegro
Travelife sustainability training, incl. human rights and child protection	All staff	2026–2027	Travelife online training
Crisis management tabletop exercise	Operations staff	April 2027	Executive Director (internal)
Local culture, heritage and responsible guiding	Guest-facing staff	Spring 2027	Internal
Product and quality: fam trips, supplier visits	Sales and operations	During 2027	Internal

Training register (one row per session; attach the attendance list or certificate)

Date	Training	Trainer	Participants	Evidence
31 Aug 2026	Offer structure, cost sheet, pricing and margins	Internal	Sales and operations team	Follow-up email; SOP Sept 2026, part A
1 Sep 2026	MICE inquiries and presentations	Damir Zagora, Project Manager	Sales and operations team	SOP Sept 2026, part B
2 Sep 2026	Technical itinerary for confirmed groups	Damir Zagora, Project Manager	Sales and operations team	SOP Sept 2026, part C
3–4 Sep 2026	Nutshell CRM	Internal	Sales and operations team	SOP Sept 2026, part D
8 Sep 2026	Croatia as a destination	Internal	Sales and operations team	SOP Sept 2026, part E
9 Sep 2026	Designing luxury programmes	Internal	Sales and operations team	SOP Sept 2026, part E7

Annex C – Grievance form

Field	Answer
Name (optional for anonymous complaints)	
Date	
Submitted to	
What happened, when and who was involved	
What outcome would you like?	
Received by / date receipt confirmed	
Outcome and action agreed	
Date of written answer	
Follow-up after one month	

Annex D – Policy acknowledgement

I confirm that I have received and read the Travel Twitch DMC Human Resources & Social Policy and the Health, Safety & Crisis Management Policy, that they were explained to me, and that I know how to raise a complaint.

Name	Role	Signature	Date

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COMPANY POLICY

Health, Safety & Crisis Management Policy

Version 1.0

Policy information	Details
Applies to	All staff, interns and agency workers of Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all programmes we run or sell; our guests
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, after any serious incident or crisis, and when the law changes
Available to	All staff on SharePoint and at onboarding; guides through briefings

1. Purpose, scope and commitment

Travel Twitch DMC d.o.o. protects the health and safety of its staff and its guests. This policy sets out how we prevent accidents, respond to incidents and manage crises.

How we work. We are an online agency. Our team works remotely, from home, using laptops and mobile phones, and we have no office premises of our own. The main health and safety risks are therefore linked to computer work at home, to staff travel for site inspections and FAM trips, and to the programmes our guests take part in.

Scope:

- our team working remotely in Montenegro and in our Boston branch;
- staff travel for site inspections, supplier visits, FAM trips and events;
- every programme we run or sell in Montenegro, Croatia, Slovenia, Albania and Bosnia and Herzegovina: transfers, guided tours, excursions, hiking and cycling, boat and yacht programmes, events and incentives.

Legal basis. For staff in Montenegro: the Law on Occupational Safety and Health (Official Gazette of Montenegro 34/14, 44/18, 84/24) and the Labour Law (Official Gazette of Montenegro 74/19, as amended). For staff of the Boston branch: the applicable US federal law and the law of Massachusetts. Our suppliers follow the safety rules for transport, maritime and tourism services in their countries.

We commit to:

- assess the risks of every job and activity, and remove or reduce them;
- give our team clear rules for safe and healthy remote work;
- work only with licensed and insured transport, boat, guiding and activity suppliers;
- keep a 24/7 duty line whenever guests are travelling with us;
- record and investigate every accident, incident and near miss, and correct its cause;
- have a clear crisis management plan, and train our team to use it;
- give guests the health and safety information they need;

- consult our team on safety, and let anyone stop an activity they believe is unsafe, without penalty.

2. Roles and responsibilities

The Executive Director is the responsible person for health and safety and leads the response to serious incidents and crises.

Role	Person	Responsibility
Responsible person, safety and crisis coordinator	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, carries the employer's responsibility for safety, keeps the incident log, leads investigations, Level 2 incidents and the crisis team
Crisis team, clients and media	Rade Bogavac, CEO and Co-owner	Member of the crisis team, communication with clients and partners in the US and other source markets, and with the media
Crisis team, coordination	Dragana Krivokapić, Head of Growth and Office Manager	Coordinates the team and suppliers during an incident, keeps the duty rota
Crisis team, operations	Tijana Raičević and Damir Zagora, Project Managers	Guest and supplier lists, communication with partners and suppliers, crisis log
Duty manager	Team member on the duty rota	First contact for guides, drivers and guests in an emergency, 24/7 while guests are travelling
All staff, interns and agency workers	Everyone	Follow this policy, report hazards and incidents at once, stop unsafe activities

3. Risk assessment and safe work rules

Risk Assessment Act. Article 17 of the Law on Occupational Safety and Health requires a Risk Assessment Act for every job position. We are arranging it with a licensed occupational safety provider. It will cover remote computer work and work on tours and site inspections, will be updated when jobs or ways of working change and after a serious injury, and will be available to all staff. Until it is in place, the risks and controls below apply.

Main risks and how we control them:

Activity	Main risks	How we control them
Computer work at home	Eye strain, back and neck pain, long screen time	Our rules for healthy remote work (below); short breaks every hour; laptop stand or separate screen and keyboard where possible
Workload and working hours	Stress and burnout, especially in the high season	Fixed shifts outside the season, free weekends, workload discussed at team meetings, compensatory days off after the season
Working alone	No help in an emergency	Team reachable by phone and Microsoft Teams during working hours; staff on tour report to the duty manager at agreed times
Staff travel and driving	Fatigue, road accidents	Business travel kept to the minimum; no driving after a long working day; seat belts; no phone use while driving
Transfers	Road accidents	Licensed vehicles and drivers only; legal driving and rest times; seat belts for all
Guided tours and walking	Heat, slips and falls, crowds	Licensed guides; water and shade stops; guide carries a first aid kit and the duty line number

Activity	Main risks	How we control them
Boat and yacht programmes	Falling overboard, drowning, storms	Licensed operators and skippers only; life jackets for every guest; weather check the day before and in the morning; trip cancelled when the skipper or forecast advises
Hiking, cycling and outdoor activities	Difficult terrain, sudden weather change, wildfire	Licensed mountain and cycling guides and instructors; route matched to the guests' fitness; weather and fire warnings checked
Heat waves (35 °C and above)	Heat stroke, dehydration	Outdoor programmes moved to early morning or evening; extra water and shade
Events and large groups	Crowding, blocked exits, fire	Venue safety check, headcount at each transfer, emergency exits briefed to staff

Healthy remote work. Every team member:

- works at a table, with the screen at eye level and good light, and avoids long work from a sofa or bed;
- takes a short break from the screen every hour and a longer break during the day;
- keeps to the agreed working hours and is not expected to be available outside them;
- keeps emergency numbers and the duty line saved in their phone;
- reports any health problem caused by work to the Executive Director, so that we can adapt the work.

4. First aid and emergency equipment

- **On tour:** guides and tour leaders carry a first aid kit and the duty line number. Our Code of Conduct, which we are introducing with all partners and suppliers, requires them to provide safe vehicles and boats, life jackets for every guest on boats, and first aid on excursions.
- **Staff travel:** staff on site inspections and FAM trips carry their phone with emergency numbers and the duty line saved.
- **First aid training:** first aid training for our operations staff is planned for 2027, with a certified provider, and will be refreshed every 3 years.
- **Emergency numbers** are saved in every staff phone and given to guides and drivers (Annex B).

5. Accident and incident reporting and investigation

Every accident, incident and near miss involving staff or guests is reported within 24 hours, investigated within 5 working days and closed only when its cause has been corrected.

What to report: injuries and illness at work, road accidents, accidents on tour, near misses, dangerous situations, guest medical emergencies, and damage to property or vehicles.

Steps:

1. **Make safe.** Stop the danger, give first aid and call 112 if needed.
2. **Alert.** Phone the duty manager immediately. The duty manager informs the Executive Director.
3. **Record.** The person involved or the guide completes the incident report (Annex A) within 24 hours, with photos and witness names.
4. **Report to authorities.** For a fatal, collective or serious injury of an employee in Montenegro, or one causing more than 3 days of absence, the Executive Director reports in writing to the Labour Inspectorate within 24 hours (Law on Occupational Safety and Health, Art. 51). For staff of the Boston branch, US reporting rules apply. The insurer is informed. For an agency worker, the agency is informed in writing the same day.

5. **Investigate.** Within 5 working days the Executive Director finds the root cause and agrees corrective actions, each with a responsible person and a deadline.
6. **Follow up.** Actions are tracked in the incident log until they are done, and the lessons are shared at the next team meeting.

The incident log is reviewed in the yearly policy review, to spot repeated causes.

6. Crisis management plan

Duty line. Whenever guests are travelling with us, a duty manager is reachable 24/7 on our duty line, **+382 67 035 255**. The number is in every final programme and voucher. For groups, we also create a WhatsApp group with the guests and the guide.

Levels:

Level	Examples	Led by
1 – Incident	Minor injury, late transfer, lost item, small supplier failure	Guide or project manager, duty manager informed
2 – Serious incident	Hospital treatment, road accident, missing guest, major disruption to the programme	Duty manager and Executive Director
3 – Crisis	Death or several injured, wildfire, earthquake, flood, epidemic, terrorism, civil unrest, border closure	Crisis team: Executive Director (lead), CEO, Head of Growth and Office Manager, Project Managers

Response steps (Annex C is the checklist):

1. Protect life: move people to safety, call 112, give first aid.
2. Account for everyone, using the guest list for the trip.
3. Escalate to the right level and open a crisis log with times and actions.
4. Contact the guests' travel agent or partner, insurers and, where needed, embassies and families, through the partner where possible.
5. Arrange medical care, alternative transport, accommodation or evacuation.
6. Communicate: only the CEO or the Executive Director speaks to the media; staff refer all questions to them.
7. Close: debrief within 7 days, update this plan, and offer staff and guests support after a distressing event.

First actions by scenario:

Scenario	First actions
Medical emergency	Call 124 or 112, first aid, guide stays with the guest, inform the insurer and the partner
Road accident	Secure the scene, call 112, check injuries, report to police, arrange a replacement vehicle
Wildfire or extreme heat	Follow civil protection orders, leave the area by the safe route, change the programme
Earthquake	Drop, cover, hold; then move to open ground, headcount, check buildings before going back in
Storm at sea	The skipper decides; return to port or shelter; Level 2 if guests are at risk
Missing guest	Search the last known point, call the guest, inform the police after 2 hours, or at once for a child or vulnerable person
Strikes, closures, unrest	Follow official sources, reroute, keep guests informed every few hours

7. Health and safety information for guests

- **Before arrival:** the final programme and voucher include our 24/7 duty line. Our Responsible travel tips give guests the 112 emergency number and practical advice: protection from the summer sun and heat, life jackets on boats, and checking the weather before going into the mountains.
- **On tour:** guides give a safety briefing before boat, hiking, cycling and other outdoor activities, and repeat key safety rules on site.

8. Suppliers

Before we work with transport, boat, guiding and activity suppliers, we check that they hold valid licences and liability insurance. We are introducing our Partner & Supplier Sustainability Code of Conduct, which includes safety requirements, with all our suppliers before the 2027 season. A supplier that causes a serious safety incident is suspended until the cause has been fixed.

9. Training, communication and review

- **Onboarding:** every new team member learns this policy, the risks of their job, the rules for healthy remote work, emergency numbers, the duty line procedure and the incident report, in their first week.
- **Occupational safety training:** during working hours, at the company's expense, repeated when risks or work change, and recorded in the training register.
- **Crisis exercise:** from 2027, a short online exercise for the operations team each April, before the season, using one scenario from section 6.
- **Guides and drivers:** briefed on safety rules and the duty line before their first tour with us each season.

Review. The Executive Director reviews this policy every October, after any Level 2 or 3 event, and when the law changes.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Incident report and investigation form

Field	Answer
Date, time and place	
Reported by (name, role, phone)	
Person(s) involved: staff / agency worker / guest / supplier	
What happened (facts, in order)	
Injuries or damage	
First aid given and by whom	
Emergency services called (which, time)	
Witnesses	
Level (1 / 2 / 3)	
Reported to the Labour Inspectorate within 24 h? (yes / no / not required)	
Insurer, agency or partner informed (who, when)	
Root cause found in the investigation	
Corrective actions, responsible person and deadline	
Closed on / by	

Annex B – Emergency contacts

Contact	Number
General emergency (Montenegro, Croatia, Slovenia, Albania, Bosnia and Herzegovina)	112
Police, Montenegro	122
Fire and rescue, Montenegro	123
Ambulance, Montenegro	124
Emergency, USA (Boston branch)	911
Travel Twitch DMC duty line (24/7 while guests are travelling)	+382 67 035 255
Ivan Perčobić, Executive Director and Co-owner	+382 69 292 768
Rade Bogavac, CEO and Co-owner	+1 617 780 4728
Dragana Krivokapić, Head of Growth and Office Manager	+382 69 914 088
Tijana Raičević, Project Manager	+382 67 613 368
Damir Zagora, Project Manager	+382 67 788 203
Lana Joketić, Travel Advisor	+382 67 862 243

Annex C – First-hour crisis checklist

- ☐ Everyone is out of danger and emergency services have been called
- ☐ First aid given; injured people are accompanied by a guide or staff member
- ☐ Headcount done against the trip list
- ☐ Duty manager and Executive Director informed; level decided
- ☐ Crisis log opened (time, facts, actions, who was called)
- ☐ The guests' travel agent or partner informed
- ☐ Insurer informed; embassy if a foreign guest is seriously hurt or missing
- ☐ Next update to guests and partners scheduled
- ☐ Media questions referred to the CEO or the Executive Director
- ☐ Incident report (Annex A) started

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COMPANY POLICY

Environmental Policy

Version 1.0

Policy information	Details
Applies to	All staff of Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, or sooner when our way of working or the law changes
Available to	All staff on SharePoint and at onboarding

1. Purpose, scope and commitment

Travel Twitch DMC d.o.o. works to keep the environmental footprint of its own operations as small as possible. This policy sets out how we do that as an online agency.

How we work. We are an online agency. Our team works remotely, from home, using only laptops and mobile phones. We have no office premises of our own, so we have no office energy, heating, water, cleaning, coffee or printing. All our documents are kept online, and vouchers, rooming lists, programmes and transfer details are sent to our partners and clients by email.

Scope. Our own operations: digital work, equipment, waste, staff travel for business, and our own vehicles and e-bikes. The environmental impact of the programmes we sell is covered by our Sustainable Transport, Sustainable Accommodation and Sustainable Excursions & Animal Welfare policies and by our Partner & Supplier Sustainability Code of Conduct.

Legal basis. Law on Waste Management (Official Gazette of Montenegro 34/24), Law on Environment and Law on Energy Efficiency of Montenegro. For the Boston branch, the applicable US and Massachusetts rules.

We commit to:

- work 100% digitally, with no printing and no printed promotional materials;
- use little energy, switch off equipment when it is not in use and buy energy-efficient equipment;
- reduce waste, and make sure old electronic equipment and batteries are reused or handed over to authorised collectors;
- keep business travel to a minimum, hold meetings online, and monitor and reduce the fuel use of our own vehicles;
- comply with all environmental laws that apply to us;
- inform every team member about these rules.

2. Responsibilities

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy and the targets, leads the yearly review
Processes and equipment	Dragana Krivokapić, Head of Growth and Office Manager	Coordinates the purchase and disposal of equipment, keeps the equipment record (Annex B)
Records and onboarding	Tijana Raičević, Project Manager	Keeps this policy on SharePoint, explains the rules to new team members, prepares the yearly review
All staff	Everyone	Follow the green remote working rules (Annex A)

3. Paperless work and promotional materials

We fulfil this 100%, because we are an agency that works online.

- **Documents:** all documents are saved online. We do not use office paper, and we have no printers, copiers or toner and ink cartridges.
- **Communication with partners and clients:** vouchers, rooming lists, transfer details, contracts and invoices are sent by email in advance to all our partners, such as hotels, museums and bus companies.
- **Promotional materials:** we do not print brochures or other promotional materials, so we do not use a printing company. Our offers, programmes and presentations are digital: our website, social media, online presentations and offers sent by email. This is our internet-only policy.

4. Energy

Because we have no office, we have no heating or electricity consumption of our own to measure: no premises, no utility bills and no heating system. Our only other direct energy use is the fuel for our three company vehicles and the electricity to charge our e-bikes (section 7). Our team uses only laptops and mobile phones, which are low-energy devices.

Our energy rules:

- switch off laptops at the end of the working day and whenever they are not in use;
- use energy-saving mode on all laptops, with the screen and the computer going to sleep automatically when not in use;
- hold internal meetings and meetings with partners and clients online.

5. Sustainable purchasing

As an online agency we buy very little. We buy no office supplies, coffee or cleaning products, and we do not produce, sell or ship any products, so we use almost no packaging.

We buy equipment such as laptops and phones only when it is needed, and we choose energy-efficient models, preferably with recognised energy labels, from suppliers that use recyclable packaging.

6. Waste

We have no office, and we produce almost no waste of our own. The little household waste our team produces goes into the municipal collection and the separate collection for paper, plastic and glass available where each team member lives.

Electronic equipment and batteries. Old laptops, phones, chargers and batteries are never thrown away with ordinary waste. They are, in this order:

1. reused within the team or repaired;
2. donated for further use;
3. returned to the retailer or service centre, or handed over to an authorised collector of electronic waste and batteries.

Each item is recorded in the equipment record (Annex B).

Waste targets:

Target	Goal	Status
Printed documents and brochures	0	Achieved and maintained
Old electronic equipment and batteries reused, donated or handed over to authorised collectors	100%	Ongoing

We review these targets once a year.

7. Business travel

As an online agency we have no office, so our team does not commute to work. This removes daily commuting completely.

We keep business travel to a minimum:

- meetings with partners and clients are held online whenever possible;
- we travel only for necessary site inspections, supplier visits, FAM trips and events;
- we combine several visits into one trip, and share one car when several team members travel together.
- **Company vehicles:** our fleet consists of two petrol-hybrid cars (Toyota Corolla Cross, 2023, and Mercedes E-Class, 2024) and one diesel van (Mercedes V-Class, 2020), used for guest transfers and business trips. Our accounting records their fuel consumption from fuel invoices, and we review it every October. When we replace a vehicle, we choose a hybrid or electric model.
- **E-bikes:** our 14 e-bikes are charged in a private garage or at the hotels where our tours stay.

8. Information and guidance for staff

- Every new team member is told about this policy and the green remote working rules (Annex A) at onboarding.
- The whole team is reminded of the rules once a year.
- Guides and other field staff are briefed before their first tour with us each season. We are also introducing our Partner & Supplier Sustainability Code of Conduct, which covers waste, water and nature, for all of them.

9. Monitoring and review

Every October the Executive Director, with the Project Manager, reviews:

- the waste targets in section 6;
- the equipment record (Annex B);
- business travel and the fuel consumption of our company vehicles during the year, and how much travel could be replaced by online meetings;
- any change in the law or in our way of working.

The results are shared with the team, and this policy is updated where needed.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Green remote working rules

Every team member follows these rules:

1. **Work digitally.** Save documents online and send everything by email. Do not print.
2. **Switch off.** Switch off your laptop at the end of the day and when you do not use it.
3. **Save energy.** Keep energy-saving and sleep mode switched on.
4. **Meet online.** Hold meetings by video call, and travel only when it is really needed.
5. **Combine trips.** Combine site inspections and supplier visits into one trip, and share a car.
6. **Buy smart.** Ask for new equipment only when it is needed, and choose energy-efficient models.
7. **Never throw away electronics.** Bring old laptops, phones, chargers and batteries for reuse, donation or authorised collection, and tell the Head of Growth and Office Manager so they can be recorded.
8. **Separate at home.** Use the separate collection for paper, plastic and glass where you live.

Annex B – Equipment record

Date	Item (laptop, phone, battery, other)	Action (reused, repaired, donated, returned to retailer, authorised collector)	Handed to	Recorded by

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COMPANY POLICY

Inbound Partner Agency Sustainability Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all inbound partner agencies we work with
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint; partner agencies will receive our requirements through the Partner & Supplier Sustainability Code of Conduct

1. Purpose, scope and commitment

Travel Twitch DMC d.o.o. works with a small number of inbound partner agencies, and this policy sets how we select them, inform them, contract them and help them improve their sustainability.

Where we stand. We adopted this policy this year. We have prepared our Partner & Supplier Sustainability Code of Conduct and will send it to every partner agency by email before the 2027 season. The Code of Conduct, the written partner agreement, the sustainability questionnaire and the yearly partner review are prepared and are being introduced step by step, as described in each section below.

Who this policy covers. "Inbound partner agencies" are local receptive agencies and DMCs that deliver services to our guests in a destination on our behalf: ground handling, transfers, excursions, guides, restaurants, venues and hotel bookings. We run Montenegro ourselves. For programmes in Croatia and Slovenia we work through partner agencies, as listed in Annex A. In Albania and Bosnia and Herzegovina we contract hotels and suppliers directly, under our supplier rules.

Why it matters. Our guests experience the partner's guides, drivers and suppliers as part of the Travel Twitch journey. The way a partner treats its staff, children, local communities and nature is therefore part of our own impact.

We commit to:

- keep an up-to-date inventory of our key inbound partner agencies;
- select new partners against clear sustainability criteria as well as quality and price;
- send every partner our Partner & Supplier Sustainability Code of Conduct, and ask them to apply it and pass relevant information on to our guests;
- introduce a written agreement with every key partner that includes sustainability, labour, anti-corruption and child protection clauses;
- motivate existing partners to improve, with goals agreed together;
- end the cooperation with any partner that fails to prevent the sexual exploitation of children in its supply chain.

2. Responsibilities

The Executive Director is the responsible person for this policy, and every team member who books services through a partner agency applies it.

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, approves new partners and any decision to end a partnership, signs partner agreements, leads the partner review
Support	Rade Bogavac, CEO and Co-owner	Supports this policy in relations with clients and partners
Supplier and partner relations	Dragana Krivokapić, Head of Growth and Office Manager	Manages relations and contracts with partner agencies, introduces our Code of Conduct with every partner, organises FAM trips and site visits
Partner records	Tijana Raičević, Project Manager	Keeps the inventory (Annex A), the communication record (Annex C) and, once introduced, the questionnaires (Annex B) on SharePoint
Project managers and travel advisors	Damir Zagora, Lana Joketić and everyone who sends requests to partners	Use only partners in the inventory, and report concerns about a partner to the Executive Director

3. Key partner agencies and inventory

Every inbound partner agency that handles at least one confirmed programme for our guests in a year, or that we plan to use in the coming season, is a key partner.

The inventory in Annex A lists each key partner, the destinations and services it covers, when it received our Code of Conduct, the status of its agreement, and its sustainability status. The Project Manager updates it when a partner is added or removed, and the Executive Director reviews it every October.

Our current key partners are Idea Exclusive in Dubrovnik, our partner agency for all programmes in Croatia, and Istranka Tours for programmes in Slovenia and Slovenian Istria.

4. Selecting new partner agencies

A new partner agency is contracted only when it meets our minimum requirements, and sustainability performance counts in the choice between candidates.

Minimum requirements (all must be met):

- registered company with a valid travel agency or tour operator licence in its country;
- valid professional liability insurance;
- licensed guides, licensed transport and insured vehicles for the services it delivers;
- receives and accepts our Partner & Supplier Sustainability Code of Conduct;
- complies with national labour law and does not use child or forced labour.

Once introduced, new partners will also sign our Inbound Partner Agency Agreement and complete the partner sustainability questionnaire (Annex B).

Preference criteria (used to choose between suitable partners):

- sustainability certification, such as Travelife or a GSTC-recognised certificate;
- a written sustainability or responsible tourism policy and a named person responsible for it;
- membership of The Code (child protection in travel and tourism) or trained staff;
- use of local guides, family-run restaurants and locally owned suppliers;

- concrete measures on waste, single-use plastic, energy and vehicle emissions;
- positive references and our own experience on a site inspection or fam trip.

The Executive Director approves the selection, and the outcome is recorded in the inventory.

5. Informing partners about our sustainability requirements

Every partner will receive our sustainability requirements in writing through our Partner & Supplier Sustainability Code of Conduct, which we are introducing before the 2027 season.

- **Existing partners:** we will send the Code of Conduct by email before the 2027 season.
- **New partners:** once introduced, we send the Code of Conduct by email when we start working together. Where there is no written agreement, accepting a booking from us means accepting the Code.
- **Passing information on to guests:** the Code asks partners to give our guests relevant sustainability information during the programme, such as local customs and dress codes, protected-area rules, responsible wildlife watching, water saving, reusable bottles and tips for buying local.
- **Planned:** a short yearly update to partners with any changes to our requirements and the improvement goals agreed with them.

Each communication is logged in Annex C, with the email saved on SharePoint.

6. Written agreements and sustainability clauses

We do not yet have written agreements with our partner agencies. Bookings are confirmed in writing by email, and our key sustainability requirements will be communicated through the Code of Conduct, which we are introducing.

We have prepared an Inbound Partner Agency Agreement template, to be signed by the Executive Director and the partner's authorised person, and we plan to sign it with all key partners. Its sustainability clauses cover:

- compliance with the Partner & Supplier Sustainability Code of Conduct, which is an annex to the agreement;
- labour conditions and national labour law (see section 8);
- prohibition of child labour and forced labour;
- protection of children from sexual exploitation, with the right to end the agreement early (see section 7);
- anti-corruption and anti-bribery;
- waste management and reduction of single-use plastic;
- protection of biodiversity and animal welfare;
- preference for local suppliers and respect for local communities and cultural heritage;
- passing sustainability information on to our guests;
- yearly questionnaire, agreed improvement goals and our right to check compliance.

Until the agreement is signed, the Code of Conduct sets the same requirements.

7. Protection of children from sexual exploitation

We do not accept any form of sexual exploitation of children in our supply chain.

- Our Code of Conduct, which we are introducing with every partner, states that we end our cooperation early, without penalty, with any partner that does not take adequate measures to prevent the sexual exploitation of children in its own business or its direct supply chain, such as the hotels, excursions, transport and guides it uses for our guests. The same right is included in our partner agreement template.
- Partners brief their guides and drivers to recognise and report risks to children, and never include visits to orphanages or programmes that use children as a tourist attraction.

- A suspected case is reported at once to the local police (Croatia 192, Slovenia 113, general emergency 112) and to our Executive Director. We then suspend bookings with the partner until the facts are clear.

8. Labour conditions at partner agencies

Our partner agencies comply with all national laws that protect the rights of their employees.

This includes the Croatian Labour Act and the Slovenian Employment Relationships Act (ZDR-1), or the labour law of any other country where a partner operates. In particular, partners give their staff written contracts, pay at least the legal minimum wage on time, respect legal working and rest hours and pay or compensate overtime, register staff for social and health insurance, and provide safe working conditions. They do not use child labour or forced labour, and they do not discriminate.

This is required by our Code of Conduct. Once introduced, partners will also confirm it in the agreement and the questionnaire. We may ask for reasonable evidence, such as confirmation that guides and drivers are legally employed or contracted and insured. A credible report of serious labour abuse leads to a review under section 10.

9. Sustainability training

We do not yet actively encourage our partners to take part in sustainability training. As a next step, we plan to start recommending relevant training for travel companies to our key partners, such as the Travelife training for travel companies and The Code's online training on child protection.

10. Partner review, improvement goals and non-compliance

Planned yearly review. As the next step in implementing this policy, the Executive Director, together with the Head of Growth and Office Manager, will review each key partner once a year, agree improvement goals with it, and decide on any corrective action. The review will cover the questionnaire, guest feedback and complaints, incidents, our own observations on tours and site visits, and progress on earlier goals.

Improvement goals. With each partner we will agree one or two concrete goals, for example removing single-use plastic water bottles on excursions, adding a local family-run supplier, training guides on child protection, or starting a sustainability certification. We give preference to the most sustainable partners when we design new programmes.

Non-compliance. If a partner does not meet the Code of Conduct or, once signed, the agreement, we agree a corrective action plan with a deadline. If the issue is not solved by the deadline, we suspend new bookings and may end the agreement. Child sexual exploitation, child or forced labour, and bribery lead to immediate suspension and normally to termination.

Review of this policy. The Executive Director reviews this policy every October together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Inventory of key inbound partner agencies

Partner agency	Destinations	Services for our guests	Contact	Code of Conduct sent / agreement	Sustainability status
Idea Exclusive, Vinogradarska 28, 20236 Mokošica – Dubrovnik, Croatia	Croatia: Dubrovnik, Dalmatia, Split and islands	Ground handling, excursions, transfers, restaurants, venues and events	Dita Novak, owner	Code of Conduct and agreement being introduced	Not yet assessed; questionnaire planned
Istranka Tours, Slovenia	Slovenia and Slovenian Istria: Koper, Piran, Ljubljana, Bled, Bohinj	Hotels, excursions, guides and transfers	Natalija	Code of Conduct and agreement being introduced	Not yet assessed; questionnaire planned

Destinations without a partner agency. Montenegro is operated by our own team. In Albania and Bosnia and Herzegovina we contract hotels and suppliers directly, and they follow the same Partner & Supplier Sustainability Code of Conduct.

Annex B – Partner sustainability questionnaire

Prepared for introduction together with the partner agreement. Once introduced, each partner agency completes it at the start of cooperation and updates it every year.

Question	Answer
Company name, address, registration and licence number	
Person responsible for sustainability (name, role, email)	
Sustainability certification (Travelife, GSTC-recognised, other, none)	
Do you have a written sustainability or responsible tourism policy? Please attach it	
Number of employees; do all have written contracts and social insurance?	
Do you pay at least the legal minimum wage and respect legal working hours and overtime rules?	
Minimum age of your workers; do you use any child or forced labour?	
How do you prevent sexual exploitation of children (staff training, The Code, supplier rules)?	
Anti-corruption: do you have rules against bribes and improper gifts?	
Waste: do you separate waste and reduce single-use plastic on tours?	
Energy, water and vehicles: what measures do you take (vehicle age and emission class, idling, maintenance)?	
Nature and animals: do any of your excursions involve wildlife or animals? How do you protect them?	
Local community: share of local guides, local restaurants and locally owned suppliers you use	
What sustainability information do you give to guests?	
Complaints, accidents or incidents in the past 12 months, and actions taken	
Sustainability training your staff attended in the past 12 months	
Your improvement goals for next year	
Name, role and signature of the person completing this form	

Annex C – Partner communication record

Partner agency	What was sent or discussed	Channel	Sent by	Date	Partner's response
Idea Exclusive	Partner & Supplier Sustainability Code of Conduct	Email			
Istranka Tours	Partner & Supplier Sustainability Code of Conduct	Email			

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CODE OF CONDUCT

Partner & Supplier Sustainability Code of Conduct

Version 1.0

Code information	Details
Issued by	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA
Applies to	All our partners and suppliers: partner agencies, accommodation, transport, excursion and activity providers, guides, restaurants, venues and boat operators
Owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
How it is shared	Being introduced: sent by email to every partner and supplier before the 2027 season; available on request
Review	Every October, together with our sustainability policies

1. Purpose and who this Code applies to

This Code sets the minimum standards that Travel Twitch DMC d.o.o. expects from every partner agency and supplier that serves our guests.

It applies to inbound partner agencies, hotels and other accommodation, transport companies and drivers, excursion and activity providers, guides, restaurants, venues and boat operators, in every country where we operate. We are introducing it with every partner and supplier by email before the 2027 season. Where there is a written agreement, it is an annex to that agreement. Where there is no written agreement, accepting a booking from us means accepting this Code.

Partners apply the Code to their own staff and, as far as they reasonably can, to the suppliers they use for our guests. Where local law sets a higher standard than this Code, the law applies.

Our own commitment. Travel Twitch DMC applies the same standards in its own operations, as set out in our Human Resources & Social Policy, Health, Safety & Crisis Management Policy and Environmental Policy.

2. Legal compliance and business ethics

Partners comply with all laws that apply to their business and conduct it honestly.

- Hold all licences, permits and insurance required for the services they provide.
- **No bribery or corruption.** Never offer, pay, request or accept bribes, kickbacks or improper gifts, to or from our staff, public officials or anyone else. Gifts or hospitality to our staff are limited to small items of symbolic value.
- Keep accurate records and issue correct invoices; no tax evasion or undeclared work.
- Protect guests' personal data and use it only to deliver the booked services.
- Compete fairly and avoid conflicts of interest.

3. Labour and human rights

Partners respect the rights of their workers and comply with all national labour laws.

- **Contracts and pay:** every worker has a written contract or legal engagement, is paid at least the legal minimum wage on time, and is registered for social and health insurance.
- **Working hours:** legal limits on working hours, rest periods and days off are respected, and overtime is voluntary and paid or compensated. Drivers keep legal driving and rest times.
- **No forced labour:** no withholding of identity documents, wages or deposits, and workers are free to leave after legal notice.
- **No child labour:** no one below the legal minimum working age is employed. Workers under 18 do not do night work or dangerous work such as driving, boat crew duties or heavy lifting.
- **Equal treatment:** no discrimination on the basis of gender, age, ethnicity, nationality, religion, disability, sexual orientation, pregnancy or union membership, and no harassment or abuse at work.
- **Freedom of association:** workers may join a trade union and bargain collectively without fear.
- **Health and safety:** safe workplaces, safe vehicles and boats, first aid, and training on safety and emergency procedures.

4. Protection of children from sexual exploitation

We have zero tolerance for the sexual exploitation of children, and partners actively help to prevent it.

- Partners never facilitate, tolerate or fail to report the sexual exploitation of children, in their own business or in their supply chain.
- Staff in contact with guests, such as reception, guides and drivers, know how to recognise warning signs and whom to call. Partners are encouraged to join The Code (thecode.org) or train their staff with its materials.
- Accommodation partners do not allow a minor to be taken to a guest's room by an unrelated adult, and they check identity documents when there is doubt.
- No excursions to orphanages, and no programmes that present children as a tourist attraction.
- Suspected cases are reported at once to the police (112 or the local police number) and to Travel Twitch DMC.

Consequence: we end our cooperation early, without penalty, with any partner that does not take adequate measures to prevent the sexual exploitation of children in its business or its direct supply chain.

5. Environment

Partners reduce their environmental impact and comply with environmental law.

- **Waste:** separate waste for recycling where local collection exists, dispose of hazardous waste such as oil, batteries and chemicals through authorised collectors, and never leave waste in nature or at sea.
- **Single-use plastic:** offer refillable water instead of small plastic bottles where safe, and avoid plastic straws, cutlery and single-use packaging on tours and events.
- **Energy and vehicles:** maintain vehicles and boats regularly, switch off engines when parked, plan routes to avoid empty kilometres, and prefer newer, lower-emission or electric vehicles.
- **Water:** save water in accommodation and kitchens, and discharge wastewater only through legal systems; boats use holding tanks and pump-out stations.
- **Chemicals:** use eco-labelled or biodegradable cleaning products where available.
- **Paper:** send vouchers, menus and programmes digitally where possible.

6. Biodiversity and animal welfare

Partners protect nature and treat animals with respect.

- Respect the rules of national parks and protected areas, such as Lovćen, Skadar Lake, Durmitor, Biogradska Gora, Krka, Plitvice and Triglav, and keep groups on marked paths.
- No feeding, touching, chasing or disturbing wild animals, and no swimming with, riding or holding wildlife.
- No excursions with captive wild animals used for entertainment, such as animal shows, photos with wild animals or dolphin performances.
- Working animals, such as horses and donkeys, are healthy, well fed, rested and not overloaded.
- Never sell, buy or serve protected species, such as date mussels (prstaci), coral, or protected plants and shells.
- Boat operators avoid anchoring on seagrass (Posidonia) meadows where moorings or sandy bottom are available.

7. Local communities and cultural heritage

Partners make sure our guests' visits benefit local people and respect local culture.

- Employ local guides and staff where possible, and buy from local farms, family-run restaurants, wineries and craftspeople.
- Pay local suppliers fair prices on time.
- Respect cultural and religious sites, explain dress codes and photography rules to guests, and ask permission before photographing people.
- Avoid overcrowding of sensitive sites and residential areas, especially in old towns such as Kotor, Budva and Dubrovnik, by planning visit times sensibly.

8. Guests: safety, quality and information

Partners keep our guests safe and help them travel responsibly.

- Provide services as described, with licensed guides, safe equipment, life jackets for every guest on boats, and first aid on excursions.
- Report every accident, incident or complaint involving our guests to Travel Twitch DMC on the same day.
- Give guests practical sustainability information during the programme: local customs, protected-area rules, responsible wildlife watching, saving water and energy, refilling bottles, and buying local.

9. Monitoring and consequences

We check that partners meet this Code, and we work with them to improve.

- We may ask partners to complete our sustainability questionnaire.
- We may check compliance through site visits, guest feedback, documents and conversations with staff.
- Partners tell us promptly about any breach of this Code, and about any legal proceedings related to labour, safety, environment or child protection.
- Where a partner falls short, we agree a corrective action plan with a deadline. If it is not met, we suspend bookings and may end the cooperation. Child sexual exploitation, child or forced labour, and bribery lead to immediate suspension and normally to termination.

Questions or concerns. Contact Ivan Perčobić, Executive Director, at ivan@thetraveltwitch.com, or discover@thetraveltwitch.com. Concerns can be raised in confidence.

Acknowledgement and acceptance

By signing, the partner confirms that it has received and read this Code, accepts it, and will apply it to its staff and, as far as reasonably possible, to the suppliers it uses for Travel Twitch DMC guests.

Field	Partner details
Company name	
Address and country	
Type of service (partner agency, accommodation, transport, excursions, guiding, other)	
Name and role of authorised person	
Email and phone	
Place and date	

Company	Name and role	Signature and stamp
[Partner company]		
Travel Twitch DMC d.o.o.	Ivan Perčobić, Executive Director and Co-owner	

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COMPANY POLICY

Sustainable Transport Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all programmes we design, sell and operate, and our transport suppliers
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint; transport suppliers will receive our requirements through the Partner & Supplier Sustainability Code of Conduct

1. Purpose, scope and commitment

Transport is the largest source of emissions in the journeys we design, and this policy sets how Travel Twitch DMC d.o.o. chooses the most sustainable transport options, weighed against price, comfort and practicality.

Scope. This policy covers how guests reach our destinations and leave them, transfers within the destination, transport used on excursions, and the transport suppliers and partner agencies we work with in Montenegro, Croatia, Slovenia, Albania and Bosnia and Herzegovina. Staff business travel is covered by our Environmental Policy.

Our role. As a destination management company we do not sell international flights. Our clients and their travel agents usually book these. We influence the choice through our advice, proposals and pre-departure information. We fully control transfers and excursions, including those we operate with our own vehicles and e-bikes (section 6), and the transport suppliers we contract.

We commit to:

- always consider the more sustainable transport option first, and choose it whenever price, comfort and practicality allow;
- advise clients and agents on the lowest-impact way to reach the region;
- design itineraries that reduce kilometres driven and make use of train, ferry, cable car, bicycle and walking;
- use right-sized, well-maintained vehicles, our own or from licensed local suppliers, and drive efficiently;
- offer helicopters, seaplanes and speedboat transfers only on a client's explicit request, always alongside a lower-impact alternative;
- integrate and promote sustainable holiday packages that combine sustainable transport, accommodation and activities.

2. Responsibilities

The Executive Director is the responsible person for this policy, and everyone who designs or books a programme applies it.

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy and new sustainable packages, approves transport suppliers, leads the yearly review
Support	Rade Bogavac, CEO and Co-owner	Promotes sustainable transport options and packages to clients and agents
Suppliers and programmes	Dragana Krivokapić, Head of Growth and Office Manager	Manages relations and contracts with transport suppliers, introduces our Code of Conduct with them, improves existing programmes
Proposals and itinerary design	Tijana Raičević and Damir Zagora, Project Managers; Lana Joketić, Travel Advisor	Apply the transport hierarchy (section 3) when preparing proposals, using the checklist in Annex A as a guide
Records	Tijana Raičević, Project Manager	Keeps the transport supplier list, prepares the planned yearly transport review
Partner agencies	Idea Exclusive, Istranka Tours	Apply the same principles in Croatia and Slovenia under our Code of Conduct

3. Our transport hierarchy

When we plan any journey, we check the options in this order and choose the first one that works for the group.

1. **Avoid unnecessary travel.** Base guests in fewer, well-located hotels, plan a logical geographic route, and avoid long day trips that return to the same base when a change of hotel would save kilometres.
2. **Walk, cycle or take the cable car.** Old towns of Kotor, Budva, Bar, Perast and Dubrovnik are explored on foot with local guides. We offer e-bike and cycling days, and the Kotor–Lovćen cable car instead of the road where it fits the programme.
3. **Rail, ferry and public transport.** We use the Belgrade–Bar railway (for example Podgorica–Kolašin, Mojkovac–Virpazar and Virpazar–Bar), the Kamenari–Lepetane car ferry across the Bay of Kotor instead of driving around the bay, regular passenger boats and, for independent travellers, intercity buses.
4. **Shared, right-sized road transport.** One minibus or coach for a group instead of several cars, and a vehicle sized to the group from our fleet categories, from sedan to full-size coach.
5. **Private car transfers** for individual guests when no better option is practical.
6. **High-impact transport only on request.** Helicopter, seaplane, private yacht and speedboat transfers are never our default. We offer them only when a client explicitly asks, always together with a lower-impact alternative, and we keep them as short as possible.

4. Transport to the destination

We advise clients and agents to reach the region in the most sustainable way, and we plan our programmes around those arrivals.

- **Direct flights first.** We recommend direct flights to Podgorica (TGD), Tivat (TIV) or Dubrovnik (DBV) over itineraries with connecting flights.
- **Rail and sea options.** Where relevant for guests coming from the wider region, we can suggest the train from Belgrade to Podgorica or Bar, or the ferry from Bari (Italy) to Bar, and arrange the onward transfer from the station or port.
- **The right airport.** We choose the arrival airport closest to the first hotel, and the departure airport closest to the last one. We plan "open-jaw" routes, for example arriving in Podgorica for the mountains and leaving from Tivat or Dubrovnik on the coast, so guests do not have to drive back across the country.
- **No short flights within the region.** Multi-country programmes such as Croatia, Montenegro and Albania are connected by road, rail or sea, never by short-haul flights.

- **Advice in proposals.** We give this advice to the agent or client in the proposal, before flights are booked.

5. Transport to the departure airport

As a DMC, our services start when guests arrive in our destination. We do not arrange or influence their transport to the departure airport in their home country. What we control is the end of the trip in our destinations:

- **Leaving our destinations.** We plan the final transfer to the nearest suitable airport, combine guests on the same flight or similar flight times into one shared transfer, and use one right-sized vehicle for a group instead of several cars.
- **Rail or ferry departures.** Where guests continue by train or ferry, we transfer them to the station or port instead of an airport.

6. Local transport: transfers and excursions

For every transfer and excursion we consider the more sustainable alternative first and give it preference, weighed against price, comfort and practicality.

Transfers

- For private transfers and small groups we use our own vehicles (see below). For larger groups we use licensed local transfer companies, such as Belavista Trend Montenegro in Herceg Novi and Rewind in Croatia, and our partner agencies in Croatia and Slovenia, and we keep a list of the transport suppliers we use.
- We match the vehicle to the group size, combine transfers where arrival times allow, and avoid empty return trips by planning routes with the supplier.
- We use the Kamenari–Lepetane ferry on routes between Herceg Novi or Dubrovnik and Tivat or Kotor where it shortens the drive.

Excursions

- We plan excursions on foot, by e-bike or bicycle, by kayak or rowing boat, by train or by cable car wherever they fit the group. Examples in our current programmes:
  - our Electric Bike Adventure Montenegro, with around 200 km cycled over a week;
  - our Euro Track cycling and self-guided Eurotrek hiking programmes;
  - our Montenegro by Train & Car tour on the Belgrade–Bar railway;
  - guided walking tours of the old towns;
  - kayaking on Skadar Lake;
  - the Kotor–Lovćen cable car.
- Boat excursions in the Bay of Kotor use shared tours or right-sized boats, follow the most direct route, and travel at moderate speed. We offer slower and quieter boats as an alternative to speedboats.
- We limit time in vehicles to keep the day enjoyable: the longest daily drive is kept as short as the route allows, and long transfers are broken by meaningful stops.

Our own vehicles and e-bikes

- **Fleet:** we operate three vehicles of our own: a Toyota Corolla Cross (2023, petrol hybrid, 5 seats), a Mercedes E-Class (2024, petrol hybrid, 5 seats) and a Mercedes V-Class (2020, diesel, 7 seats). We use the hybrid cars first for transfers of up to four guests, and the V-Class for small groups.
- **Drivers:** our vehicles are driven by our own employees, who hold licences for passenger transport and follow the same driving rules we require from our suppliers (section 7).
- **Registration, insurance and maintenance:** all our vehicles are registered and insured for passenger transport and serviced regularly at authorised or independent workshops. We keep all service invoices.

- **Fuel and replacement:** fuel consumption is recorded from fuel invoices and reviewed every October under our Environmental Policy. When we replace a vehicle, we choose a hybrid or electric model that meets the latest emission standard.
- **E-bikes:** we own 14 e-bikes for our e-bike tours. The tours are led by licensed cycling guides we engage, every guest receives a helmet and safety equipment, and the bikes are stored and charged in a private garage or at the hotels where the tour stays.

7. Requirements for transport suppliers

We are introducing our Partner & Supplier Sustainability Code of Conduct with all transport suppliers before the 2027 season. In addition, we expect the following:

- **Licences and insurance:** licensed company, licensed drivers and skippers, and vehicles and boats insured for passenger transport.
- **Vehicles:** roadworthy and regularly serviced, with seat belts for every seat. For new contracts we prefer vehicles that meet the Euro 6 emission standard and are no more than 10 years old. We also prefer hybrid or electric vehicles for short urban and airport transfers where available.
- **Driving:** drivers switch off engines while waiting and parked, drive smoothly and within speed limits, keep legal driving and rest times, and do not use their phone while driving.
- **Boats:** skippers are licensed, carry life jackets for every guest, use holding tanks and pump-out stations, and do not anchor on seagrass meadows where moorings or sand are available.
- **Comfort with less waste:** water is offered in refillable bottles or large containers where safe, instead of small single-use bottles.

As a next step, we are introducing the checklist in Annex C for selecting new transport suppliers.

8. Information to guests

We help our guests choose and use low-impact transport.

- Our proposals show the train, ferry, cable car, walking and e-bike elements of the programme.
- Our sustainable package, Montenegro Slow & Green, is offered to agents and partners as our sustainable choice.
- Guides explain on tour why we walk, cycle or take the train or ferry where we do.

9. Monitoring and review

- The transport supplier list is updated when suppliers change.
- **Planned:** a yearly review of a sample of programmes, recording the share that include a train, ferry, cable car, cycling or walking element, and the number of high-impact transfers on client request.
- This policy is reviewed every October together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Sustainable transport checklist for every programme

A guide for the person who prepares the proposal.

Question	Answer
Programme name and client	
Arrival and departure airports: are they the closest to the first and last hotel? Is an open-jaw route possible?	
Did we advise direct flights, or rail or ferry options to reach the region?	
Can the route be planned with fewer kilometres (fewer hotel changes, logical order, no back-tracking)?	
Which parts are on foot, by bicycle or e-bike, by train, ferry, cable car or kayak?	
Are transfers shared and is the vehicle sized to the group?	
Are any high-impact transfers included (helicopter, seaplane, speedboat transfer, private yacht)? Requested by the client? Alternative offered?	
Are all transport suppliers on our approved list?	
Is sustainable transport information included in the proposal and pre-departure information?	
Checked by (name)	

Annex B – Low-impact transport options in our destinations

Option	Where	How we use it
Belgrade–Bar railway	Bar, Virpazar, Podgorica, Kolašin, Mojkovac, Bijelo Polje	Scenic transfers between the coast, Skadar Lake and the mountains, instead of road transfers
Bari–Bar ferry	Italy to Montenegro	Arrival option for guests travelling from Italy
Kamenari–Lepetane ferry	Bay of Kotor	Shortens the drive between Herceg Novi or Dubrovnik and Tivat or Kotor
Kotor–Lovćen cable car	Kotor, Lovćen National Park	Replaces the road up the serpentine to Lovćen and Njeguši
Walking tours	Old towns of Kotor, Budva, Perast, Bar, Cetinje and Dubrovnik	Guided city tours without vehicles
E-bikes and bicycles	Luštica, Skadar Lake, Kolašin, Durmitor, Lovćen	Day rides and multi-day cycling programmes with a support vehicle
Kayaks and rowing boats	Skadar Lake, Bay of Kotor	Quiet, low-impact alternatives to motorboats
Hiking	Durmitor, Biogradska Gora, Prokletije, Lovćen, Orjen	Guided and self-guided hiking programmes
Intercity buses	Montenegro, Croatia	Suggested to independent travellers between towns

Annex C – Transport supplier checklist

Item	Answer
Supplier name, address and licence number	
Services (transfers, coaches, boats, other) and destinations	
Liability insurance for passenger transport (insurer, policy number, valid until)	
Fleet: vehicle types, number of seats, year of manufacture, Euro emission class, hybrid or electric vehicles	
Boats: licences, life jackets for every guest, holding tank	
Service and technical inspection records available on request?	
Drivers: licences, legal driving and rest times, training in safe and efficient driving	
Engines switched off while waiting and parked?	
Refillable water instead of single-use bottles?	
Signed Partner & Supplier Sustainability Code of Conduct?	
Approved by (name)	

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COMPANY POLICY

Sustainable Accommodation Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all accommodation we book for our guests
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint; accommodation providers will receive our requirements through the Partner & Supplier Sustainability Code of Conduct

1. Purpose, scope and commitment

Accommodation is the largest part of our guests' stay and of our purchasing, and this policy sets our long-term strategy, with targets and timelines, to improve the sustainability of the hotels and other properties we use.

Scope. All accommodation booked by Travel Twitch DMC d.o.o. for our guests: hotels, resorts, boutique hotels, villas, eco-villages, ethno-villages, family guesthouses and glamping. This covers Montenegro and the properties we book directly in Croatia, Albania and Bosnia and Herzegovina. Properties booked through our partner agencies in Croatia and Slovenia are covered through our Inbound Partner Agency Sustainability Policy.

Two kinds of relationships. Some properties work with us under a written contract, such as a tour operator agreement, allotment or wholesale contract. Others are booked case by case through a written booking request and confirmation. This policy applies to both.

Where we stand. We adopted this policy this year, with 2026 as our baseline year. We have made a register of all the accommodation we use. Our Partner & Supplier Sustainability Code of Conduct, the sustainability addendum for contracts, the questionnaire and the site-inspection check are prepared and are being introduced step by step, as described below.

We commit to:

- give preference to accommodation with internationally recognised sustainability certification, and to locally owned properties that respect local architecture and heritage;
- communicate our sustainability requirements to every property we use through our Code of Conduct;
- introduce sustainability clauses in new and renewed accommodation contracts. Where there is no written contract, our Code of Conduct is a mandatory condition of every booking, with sanctions;
- measure the share of certified properties and certified overnight stays, and grow it every year;
- support joint initiatives in the destination on request, and reward properties that actively work on sustainability;
- protect children's rights throughout our accommodation supply chain;

- end cooperation with properties that fail to protect children from sexual exploitation, or that clearly endanger basic resources of their neighbouring communities.

2. Responsibilities

The Executive Director is the responsible person for this policy, and everyone who books accommodation applies it.

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, the targets and any termination, leads the yearly review
Support	Rade Bogavac, CEO and Co-owner	Promotes sustainable and certified properties to clients and agents
Contracts and supplier relations	Dragana Krivokapić, Head of Growth and Office Manager	Manages contracts and relations with accommodation providers, introduces the sustainability addendum, introduces our Code of Conduct with every property
Accommodation register	Tijana Raičević, Project Manager	Keeps the accommodation register up to date, prepares the yearly figures
Project managers and travel advisors	Tijana Raičević, Damir Zagora, Lana Joketić and everyone who books accommodation	Give preference under section 5, advise clients on sustainable options, report concerns

3. Strategy, targets and timelines

Our strategy is to know the sustainability performance of every property we use, require minimum standards from all of them, and steadily move our guests' nights towards certified and locally rooted accommodation.

Target	Baseline 2026	2027	2028	2029
Properties used that have received our Code of Conduct	Being introduced	100%	100%	100%
Written contracts with a signed sustainability addendum	Prepared	100% of new and renewed	100% of all	100% of all
Properties used that returned the questionnaire	Prepared	50%	75%	90%
Share of certified properties among properties used	Measured in the register in 2026	+3 percentage points	+3 percentage points	+3 percentage points
Share of overnight stays in certified properties	Measured in the register in 2026	+5 percentage points	+5 percentage points	+5 percentage points
Properties informed about sustainability training and certification	–	10	20	all contracted
Nights in Slow & Green in locally owned properties	–	100%	100%	100%

We aim to keep our certified shares at least double the estimated national average for Montenegro (see section 6). Progress is measured in the accommodation register and reviewed every October. Where a target is missed, the Executive Director sets corrective actions for the next year.

4. Communicating our objectives and requirements

Every property we use receives our sustainability requirements in writing.

- **All properties (being introduced):** we will send our Partner & Supplier Sustainability Code of Conduct by email to every property before the 2027 season. It sets our requirements on labour and child protection, anti-corruption, waste and single-use plastic, energy and water saving, biodiversity, and information for guests. Where there is no written agreement, accepting a booking from us means accepting the Code.
- **Contracted properties (being introduced):** the Accommodation Sustainability Addendum and the questionnaire (Annex A) at contracting and at every renewal.
- **Planned:** a yearly update to properties with our objectives, results and any new requirements.
- Communication is logged in Annex B.

5. Selecting accommodation: preferences

When we choose between properties that meet the client's brief, comfort level and budget, we give preference, in this order, to properties that:

1. hold an internationally recognised sustainability certification, such as Travelife for Accommodation, Green Key or another GSTC-recognised scheme;
2. have returned our questionnaire with good results, or are actively working towards certification;
3. are locally owned and employ local staff;
4. incorporate local architecture, art or cultural heritage, such as restored stone houses in Perast and Kotor, ethno-villages and eco-villages in the north, and family wineries and guesthouses around Skadar Lake;
5. serve local food and source from local producers.

Price, comfort, availability, safety and the client's preferences remain selection criteria.

6. Certified accommodation: measurement and growth

From 2026 we measure every year how many of the properties we use are certified, and what share of our guests' nights they represent.

- **Recognised certificates:** Travelife for Accommodation, Green Key, EU Ecolabel, and other schemes recognised by the Global Sustainable Tourism Council (GSTC). We record the scheme and validity date, and check validity on the scheme's public list or the certificate.
- **Two measures:** (1) certified properties as a share of all properties used in the year; (2) overnight stays in certified properties as a share of all overnight stays we booked.
- **Market average:** we compare our shares with the national average. On public information, only around 10 of about 446 hotels and other accommodation establishments in Montenegro (UNWTO data for 2024) hold an internationally recognised certificate, about 2%. We update this estimate every year.
- **Growth:** the yearly figures are compared with the previous year and with the targets in section 3, and reported in our yearly sustainability review.

7. Contract conditions

Properties without a written contract. Many of the properties we use are booked case by case. Once introduced, our Code of Conduct will be a mandatory condition of every booking for them: accepting a booking from us will mean accepting the Code. It covers child labour, protection of children from sexual exploitation, anti-corruption and bribery, waste management and biodiversity protection.

Written contracts. We have prepared an Accommodation Sustainability Addendum with our basic sustainability clauses, and we are introducing it in new and renewed accommodation contracts. The addendum covers:

- compliance with the Partner & Supplier Sustainability Code of Conduct;

- no child labour, and protection of young workers and children's rights;
- protection of children from sexual exploitation, with our right to end the contract early;
- anti-corruption and anti-bribery;
- waste management and reduction of single-use plastic;
- protection of biodiversity and animal welfare;
- energy and water saving;
- respect for neighbouring communities' basic resources, with our right to end the contract;
- local architecture, heritage and intellectual property of local communities;
- sustainability information for guests;
- the yearly questionnaire and our right to check compliance.

Sanctions for a property that breaches the Code of Conduct or the addendum:

1. a written warning with a corrective action plan and deadline;
2. if not corrected: no new bookings, and removal from our proposals;
3. for child labour, sexual exploitation of children, forced labour, bribery or a clear threat to community resources: immediate suspension and normally termination, with confirmed guests moved to another property where possible.

8. Training, education and collective actions

- **Training and education (planned).** We do not yet actively encourage properties to take part in sustainability training. As a next step, we plan to start sharing information on available training, such as the Travelife for Accommodation programme, Green Key, and courses by the National Tourism Organisation of Montenegro and local tourism organisations.
- **Collective actions.** On request, we support and take part in joint initiatives with other tour operators, Travelife, tourism organisations and hotel associations that promote sustainability among accommodations in our destinations, such as joint letters to hotels, workshops, plastic-reduction campaigns and promotion of certification. Any participation is recorded in Annex B.

9. Incentives for sustainable properties

Properties that actively engage in sustainability receive concrete benefits from us.

- **Priority in proposals:** certified properties and properties that actively work on sustainability are offered first when they fit the client's brief.
- **Product benefits:** they are the first choice for our sustainable package, Montenegro Slow & Green.
- **Planned:** marketing benefits, such as presenting their sustainability practices to clients and agents.

10. Children's rights and child labour

Throughout our accommodation supply chain, children's rights must be respected and protected.

- Properties do not employ anyone below the legal minimum age for employment (15 in Montenegro and Croatia), and they follow ILO Conventions No. 138 and No. 182.
- Young workers under 18, including students on work placements, have special protection. They do no night work and no dangerous work. Their working hours are limited by law and do not interfere with school, and they are supervised and trained.
- Where a supplier employs a child in light work allowed by law, the property ensures special working conditions that safeguard the child's health, safety, education and development.
- This is required by our Code of Conduct, which we are introducing with every property. Once introduced, properties will also confirm it in the addendum and the questionnaire. Any case of child labour leads to immediate suspension.

11. Protection of children from sexual exploitation

Our Code of Conduct, which we are introducing with every property, allows us to end our cooperation early, without penalty, if the property does not take adequate measures to prevent the sexual exploitation of children. The same right is included in the Accommodation Sustainability Addendum we are introducing in new and renewed contracts. We expect at least the following measures:

- clear staff rules;
- awareness training for reception and security staff;
- checks when a minor arrives with an unrelated adult;
- no access for minors to guests' rooms without a parent or guardian;
- immediate reporting of suspected cases to the police (122 in Montenegro, 192 in Croatia, 112 everywhere) and to us.

Once the Code of Conduct is introduced, properties booked without a written contract will accept the same rule through it.

12. Local architecture, heritage and intellectual property

We prefer accommodation and restaurants that incorporate local art, architecture or cultural heritage, within the normal limits of price and comfort.

We respect the intellectual property rights of local communities. We do not use traditional designs, music, recipes, stories or images of local communities and artists in our marketing without permission, we credit them, and we pay fairly for performances, workshops and demonstrations.

13. Impact on local community resources

If there is clear evidence that a property we use is putting at risk basic services for its neighbouring communities, we may end our cooperation. Examples are water supply during the summer, energy, food, access to healthcare, land or soil. Before we decide, we raise the issue with the property and ask for corrective action, unless the situation is serious and urgent. The right to end the cooperation is also included in the Accommodation Sustainability Addendum we are introducing.

14. Monitoring and review

- **Register:** the accommodation register records every property we use, its contract type, certification and validity, and the nights booked. Addendum and questionnaire status are added as they are introduced.
- **Site inspections (planned):** the sustainability check in Annex A, part 2 will be added to our site inspections.
- **Yearly review:** every October the Executive Director reviews the targets in section 3, the certified shares against the previous year and the market average, incidents and complaints, and decides on incentives and sanctions.
- **Policy review:** this policy is reviewed every October together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Accommodation sustainability questionnaire and site-inspection check

Part 1 – Questionnaire, completed by the property

Question	Answer
Property name, address, category and number of rooms	
Owner: locally owned / national chain / international chain	
Sustainability certification (scheme, level, valid until); or plans to certify	
Person responsible for sustainability (name, email)	
Do you separate waste and recycle? Which fractions?	
What have you done to reduce single-use plastic (water bottles, toiletries, straws)?	
Energy: renewable energy, LED lighting, key-card systems, efficient heating and cooling	
Water: low-flow fittings, towel and linen reuse, irrigation, wastewater treatment	
Local purchasing: share of food and products from local producers	
Local staff and local ownership; minimum age of employees; written contracts and legal pay	
Child protection: staff rules and training on preventing sexual exploitation of children	
Local architecture, art or cultural heritage in the building, design or programme	
Sustainability information you give to guests	
Sustainability training your staff attended in the past 12 months	
Name, role and signature	

Part 2 – Site-inspection check by Travel Twitch DMC staff

Observation	Notes
Visible waste separation and few single-use plastics	
Energy and water-saving measures seen in rooms and public areas	
Local food, products and staff	
Local architecture, art or heritage	
No signs of child labour; young workers supervised	
Child protection notice or procedure at reception	
Any sign of pressure on local water, energy or land	
Overall: preferred / acceptable / improvement needed	
Inspected by (name)	

Annex B – Communication, training and collective actions record

Property or initiative	What was sent, offered or done	Channel	By	Date	Result
All properties used	Partner & Supplier Sustainability Code of Conduct	Email			
Contracted properties	Accommodation Sustainability Addendum (when introduced)	Email			

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COMPANY POLICY

Sustainable Excursions & Animal Welfare Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all excursions and activities we offer or sell
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint; excursion providers will receive our requirements through the Partner & Supplier Sustainability Code of Conduct

1. Purpose, scope and commitment

Excursions and activities are where our guests meet nature, culture and local people most directly. This policy sets how Travel Twitch DMC d.o.o. improves the sustainability of the excursions we offer, and how we protect animals, wildlife, heritage and communities.

Scope. This policy covers every excursion, activity and experience that is part of our programmes or sold to our guests, in Montenegro, Croatia, Slovenia, Albania and Bosnia and Herzegovina. Examples are boat trips, tastings, village visits, guided tours, hiking, cycling, rafting, canyoning, jeep and ATV tours, cooking classes and events. It applies whether we contract the provider directly or the excursion is arranged through a partner agency or a hotel.

Where we stand. We adopted this policy this year. This year we made a register of the sensitive excursions in our destinations. Our Partner & Supplier Sustainability Code of Conduct, the detailed codes of conduct for each type of sensitive excursion and the provider checklist are prepared, and we plan to share them with providers before the 2027 season.

We commit to:

- map the environmentally and culturally sensitive excursions in our destinations, and manage them with written codes of conduct;
- communicate our sustainability objectives and requirements to every excursion provider;
- prefer certified providers where they are available;
- never offer excursions that harm people, animals, plants or natural resources, or that are socially or culturally unacceptable;
- meet the highest animal welfare standards, with no captive wildlife attractions, no wildlife harvesting or trade, and only non-invasive, responsibly managed wildlife watching;
- use skilled, licensed guides at sensitive cultural, heritage and natural sites;
- include and promote excursions that directly benefit local communities and support nature and biodiversity.

2. Responsibilities

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, new excursions and providers and any exception, keeps the list of excursions we do not offer, leads the yearly review
Support	Rade Bogavac, CEO and Co-owner	Promotes community and nature excursions to clients and agents
Suppliers and programmes	Dragana Krivokapić, Head of Growth and Office Manager	Manages relations and contracts with excursion providers, introduces our Code of Conduct with them, improves existing programmes
Proposals and programme design	Tijana Raičević and Damir Zagora, Project Managers; Lana Joketić, Travel Advisor	Check every new excursion against sections 6 to 9 when preparing proposals and programmes
Records	Tijana Raičević, Project Manager	Keeps the sensitive excursions register and, once introduced, provider checklists and signed codes on SharePoint
Guides and tour leaders	All guides working for us	Follow our Code of Conduct on tour, brief guests and report incidents
Partner agencies and hotels	Idea Exclusive, Istranka Tours, hotels	Apply the same rules to excursions they offer to our guests

3. Mapping sensitive excursions

We keep a register of the environmentally and culturally sensitive excursions available in each destination. It covers both the excursions we sell ourselves and those that partner agencies or hotels offer to our guests.

The register is part of our Sensitive Excursions Register and Codes of Conduct. It lists each sensitive excursion, the destination, the provider, how it is sold, the main risks, and the code of conduct that applies. It covers marine activities and boat trips, wildlife watching and protected areas, cultural and historic sites, visits to traditional communities, activities involving animals, sport fishing, and motorised and adventure activities. The Project Manager updates it when an excursion or provider is added, and the Executive Director reviews it every October.

4. Selecting providers and communicating our requirements

Every excursion provider meets our minimum requirements and receives our sustainability requirements.

Minimum requirements:

- registered and licensed for the activity, with licensed guides, skippers or instructors;
- liability insurance and safety equipment suited to the activity;
- for activities in national parks or nature parks: a valid permit or concession from the park authority;
- receives and accepts our Partner & Supplier Sustainability Code of Conduct.

Once introduced, providers of sensitive excursions will also receive and sign the specific code of conduct for their type of excursion, and the excursion provider checklist (Annex A) will be completed at selection and reviewed every year.

Communication. We are introducing our Partner & Supplier Sustainability Code of Conduct with all excursion providers we work with directly, by email, before the 2027 season. Providers that work with our guests through a partner agency will receive it through that agency. As a next step, we plan to share the detailed codes for sensitive excursions with the providers concerned.

Certified providers. Where available, we prefer excursion providers that operate under recognised and independently controlled sustainability standards. Examples are Travelife, GSTC-recognised certificates and Blue Flag for sustainable boating tourism operators. As a minimum, providers in protected areas must hold valid park permits. Certification is recorded in the register, and certified providers get priority in our proposals.

5. Codes of conduct for sensitive excursions

Our Partner & Supplier Sustainability Code of Conduct, which we are introducing with all excursion providers, includes rules for sensitive activities: respecting the rules of national parks and protected areas, no feeding, touching or chasing wild animals, no captive wild animals used for entertainment, no protected species sold or served, no anchoring on seagrass meadows, respect for cultural and religious sites, avoiding overcrowding in old towns, and giving guests information on local customs, protected-area rules and responsible wildlife watching.

This year we have also prepared detailed codes of conduct for each type of sensitive excursion, in our Sensitive Excursions Register and Codes of Conduct, and we plan to share them with the providers concerned. Each detailed code:

- reduces negative visitor impact and improves the visitor experience;
- is based on international and national good practice, such as:
  - the ABTA Global Welfare Guidance for Animals in Tourism;
  - the ACCOBAMS guidelines for commercial cetacean watching;
  - the rules of the National Parks of Montenegro and other protected areas;
  - UNESCO World Heritage visitor-management principles;
  - Leave No Trace principles;
  - the GSTC criteria;
- will be agreed locally with each provider, who signs it;
- explains what the provider tells our guests, how, and when, including the customer code of conduct.

6. Excursions we do not offer

We do not offer, sell or promote any excursion that harms people, animals, plants or natural resources such as water or energy, or that is socially or culturally unacceptable. In particular, we do not offer:

- attractions with captive wild animals used for entertainment, such as animal shows, dolphinariums, photo opportunities with wild animals, or restaurants and roadside stops that keep bears or other wild animals in cages;
- riding, touching, feeding or swimming with wild animals;
- hunting trips and any excursion that harvests, consumes, displays, sells or trades wildlife (see section 8);
- off-road driving outside existing tracks, or motorised activities in sensitive zones of protected areas;
- visits to orphanages, or any programme that uses children, poverty or private religious rituals as a tourist attraction;
- activities that use scarce local resources, such as water during summer shortages, at the expense of residents;
- activities that are illegal, unsafe, or disrespectful of local culture, religion or heritage.

New excursions are checked against this list before they are offered. If a guest asks for an excursion on the list, we explain why we do not offer it and suggest a responsible alternative.

7. Animal welfare

We do not offer excursions or attractions where captive wildlife is acquired, bred or held. The only exception is an authorised operator that is suitably equipped and runs a properly regulated activity in full compliance with

local, national and international law, such as a licensed rescue or rehabilitation centre. Any such exception is approved by the CEO after a welfare check against the ABTA Global Welfare Guidance for Animals in Tourism.

Where our excursions involve domestic or working animals, such as horses on rural riding programmes or animals on farms we visit, housing, care and handling must meet the highest welfare standards:

- animals have water, suitable food, shade and shelter, rest periods and veterinary care;
- they are healthy, free from injuries and pain, and not overworked;
- rider weight and working hours are limited;
- they are handled without force or harmful equipment.

Guides stop an activity and report to us if they see an animal in distress. We suspend any provider that does not meet these standards.

8. Wildlife harvesting, consumption and trade

We do not offer excursions that harvest, consume, display, sell or trade wildlife species, unless the activity is regulated, ensures sustainable use, and complies with local, national and international law. In practice:

- no hunting tourism;
- no restaurants or boat trips serving protected species, such as date mussels (prstaci) or undersized and protected fish;
- no sale or collection of protected species or their products as souvenirs, such as coral, noble pen shells (Pinna nobilis), turtle products, or protected plants and shells;
- sport fishing only with licensed operators and valid fishing permits, respecting closed seasons, minimum sizes and catch limits, with release of protected or undersized fish;
- farm-raised mussels and oysters from licensed farms in the Bay of Kotor, and other legal local products, are allowed and supported.

9. Wildlife interactions

Excursions involving free-roaming wildlife follow the rules of national parks and protected areas and the wildlife rules in our Code of Conduct, which we are introducing with all excursion providers. We have also prepared a detailed code for wildlife watching, based on the Travelife guidance and the international codes listed in section 5. Interactions must be non-invasive, responsibly managed, and must not harm the animals or change the behaviour or viability of wild populations. We take cumulative impacts into account.

- **Birds on Skadar Lake and at the Ulcinj Salina:** boats and kayaks keep their distance from nesting and feeding birds, such as the Dalmatian pelican, avoid nesting areas in the breeding season, and do not use drones.
- **Dolphins in the Adriatic:** boats never chase or encircle them, slow down and keep a safe distance, and leave if the animals show signs of disturbance. Guests do not swim with or feed them.
- **Mountain and forest wildlife:** groups stay on marked trails and keep quiet. Nobody feeds wildlife.
- **Cumulative impact:** we plan visits outside the busiest times where possible and keep groups small.

10. Skilled guides

At sensitive cultural sites, heritage sites and ecologically sensitive areas, our guests are led by skilled and licensed guides:

- licensed tourist guides for old towns and heritage sites, such as Kotor, Budva, Perast, Cetinje, Stari Bar and Dubrovnik, and for monasteries;
- licensed mountain guides, cycling guides and rafting, canyoning and kayak instructors for outdoor activities;

- park-authorised or local nature guides in national parks.

Guides are briefed before their first tour with us each season, and will also receive our Code of Conduct.

11. Supporting local communities

Where relevant to the product, we include and promote excursions that directly benefit local communities. Examples from our current programmes:

- tastings and visits with family producers:
  - olive oil in Bar and Luštica;
  - smoked ham and cheese in Njeguši;
  - wine at family wineries;
  - the 7hills distillery in Klinci village;
  - farm-raised mussels and oysters in the Bay of Kotor;
- village visits and homemade food in Lipovik, Rijeka Crnojevića and mountain katuns;
- cooking classes in Kotor;
- painting and art workshops with local artists, such as Ivana Milić Art & More and Tamara Tag Paint & Wine;
- heritage dining at The Wild Table in a former monastery;
- family taverns around Skadar Lake.

We pay local hosts fairly, buy their products, and give guests the chance to buy local crafts and food directly from the makers. Where suitable social projects exist in our destinations, we include visits on request, with the community's consent.

12. Supporting environmental and biodiversity protection

Where relevant to the product, we include and promote excursions that support local environments and biodiversity:

- visits with paid entrance fees to Montenegro's national parks (Lovćen, Skadar Lake, Durmitor, Biogradska Gora and Prokletije), which support their protection;
- birdwatching at Skadar Lake and the Ulcinj Salina with local ornithologists;
- low-impact activities such as hiking, cycling, kayaking and the Kotor–Lovćen cable car;
- on request for incentive and corporate groups, a beach, sea or trail clean-up with a local environmental organisation.

13. Information to guests

Guests receive our Responsible travel tips with their final programme before arrival. Guides give the key rules verbally before each sensitive activity. We plan to start giving guests the specific do's and don'ts for each type of sensitive excursion.

14. Monitoring and review

- **Register:** the sensitive excursions register is updated when excursions or providers change. Provider checklists will be added once introduced.
- **Incidents and feedback:** guides report animal welfare concerns, damage to nature or heritage, and guest complaints. The Executive Director decides on corrective action, suspension or termination.
- **Yearly review:** every October the Executive Director reviews the register, incidents, certification and the share of community and nature excursions in our programmes.
- **Policy review:** this policy is reviewed every October together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Excursion provider checklist

Prepared for introduction. Once introduced, it is completed for each excursion provider at selection and reviewed every year.

Item	Answer
Provider name, address, registration and licence numbers	
Excursions or activities provided, destinations	
Guides, skippers or instructors: licences and qualifications	
Liability insurance (insurer, policy number, valid until) and safety equipment	
Park permit or concession, for activities in protected areas	
Sustainability certification (scheme, valid until), if any	
Does the excursion involve animals or wildlife? If yes, how are welfare and distance rules applied?	
Is any wildlife harvested, served, sold or displayed? (must be No, unless legal and sustainable)	
Waste, single-use plastic, fuel and noise: measures taken	
Local benefit: local staff, local products, fair payment to hosts	
Maximum group size and how crowding is avoided	
What information and rules are given to guests, and how	
Code of Conduct received (date); sensitive excursion code signed (type)	
Approved by (name)	

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COMPANY POLICY

Tour Leaders, Guides & Local Representatives Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all tour leaders, guides and local representatives who work with our guests, whether employed by us or engaged as freelancers
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint; guides receive our requirements through the seasonal briefing and, once introduced, the Partner & Supplier Sustainability Code of Conduct

1. Purpose and scope

Tour leaders, guides and local representatives are the face of Travel Twitch DMC in the destination. This policy sets out how we engage them, what we expect from them and how we support them in their role, including on sustainability.

Who this policy covers:

- **Guides and tour leaders:** licensed local guides who lead our guests, usually engaged on a freelance basis for each programme;
- **Local representatives:** our own team members who meet and assist guests in the destination, for example on events, incentive programmes and FAM trips;
- **Instructors and skippers:** licensed instructors and skippers for outdoor and boat activities, engaged through the provider of the activity.

2. Employment and engagement conditions

Everyone who leads or assists our guests knows their terms and pay before they start.

- **Freelance guides and tour leaders:** before each tour we confirm in writing, by service agreement or email, their tasks, the programme, working hours and fee.
- **Our own team members** who act as local representatives have a written employment contract that states their salary and working conditions, as set out in our Human Resources & Social Policy.
- **Working hours and rest:** programmes are planned so that guides have reasonable working hours and rest between working days.

3. Fair pay

- We pay our guides, tour leaders and other local staff fair fees, in line with market rates for licensed guides in Montenegro and the region, which are well above the legal minimum wage.
- Fees are agreed in advance and paid on time.

- Our own employees are paid at least the statutory minimum wage, and we set salaries to provide a living wage.

4. Qualifications

We work only with licensed and qualified people:

- licensed tourist guides for towns, heritage sites and monasteries, such as Kotor, Budva, Perast, Cetinje, Stari Bar and Dubrovnik;
- licensed mountain and cycling guides for hiking and e-bike tours;
- licensed or certified instructors and skippers for rafting, kayaking, canyoning and boat programmes;
- park-authorised or local nature guides in national parks.

We prefer guides who live in the destination and know it well.

5. Information, briefing and training

Code of Conduct (being introduced). We will send our Partner & Supplier Sustainability Code of Conduct to all our guides and tour leaders before the 2027 season, and they will be expected to follow it. It covers respect for protected areas and wildlife, cultural heritage, waste and single-use plastic, protection of children and information for guests.

Seasonal briefing. Before their first tour with us each season, guides are briefed on our programmes, our requirements, the key points of the Code of Conduct, safety rules and our 24/7 duty line. The content of the briefing is listed in Annex A.

Sustainability training (planned). Our guides and tour leaders have not yet completed formal training in general tourism sustainability principles. We plan to introduce this in 2027–2028, starting with our own team members who act as local representatives.

6. Destination knowledge

Our guides and local representatives are local people who know Montenegro and the region very well, including its sustainability issues, such as:

- overcrowding in Kotor and other old towns at cruise-ship peak times;
- water shortages on the coast in summer;
- the rules of national parks and protected areas, such as Skadar Lake, Durmitor and Lovćen;
- respectful behaviour at monasteries, churches and in villages.

7. What guides tell our guests

We expect our guides to give our guests practical sustainability information during the programme, including:

- local customs and dress codes at religious sites;
- asking permission before photographing people;
- rules in national parks and protected areas;
- responsible wildlife watching: no feeding, touching or chasing wild animals;
- saving water, and refilling bottles instead of buying plastic;
- buying from local producers, restaurants and craftspeople;
- not buying souvenirs made from protected plants or animals, or historic artefacts.

Before boat, hiking, cycling and other outdoor activities, guides give a safety briefing.

8. Protection of children

Our Code of Conduct, which we are introducing with all guides and tour leaders, includes a section on the protection of children from sexual exploitation. Guides:

- know how to recognise warning signs;
- never include visits to orphanages or programmes that present children as an attraction;
- report any suspected case at once to the police (112 or 122) and to our duty line or Executive Director.

9. Responsibilities

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, approves guides we work with, receives reports of incidents and concerns
Supplier relations	Dragana Krivokapić, Head of Growth and Office Manager	Manages relations with guides, introduces our Code of Conduct with them, organises the seasonal briefing
Programmes and confirmations	Tijana Raičević and Damir Zagora, Project Managers; Lana Joketić, Travel Advisor	Confirm tasks, programme, working hours and fee to guides in writing before each tour
Records	Tijana Raičević, Project Manager	Keeps the guide register (Annex B) on SharePoint

10. Monitoring and review

- Guest feedback on guides is reviewed after each programme, and any concern is discussed with the guide.
- Incidents and concerns, including any related to child protection, are reported to the Executive Director, who decides on corrective action or on ending the cooperation.
- Every October the Executive Director reviews this policy, the guide register and feedback, together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Seasonal guide briefing: content

- ☐ Our programmes for the season and what our guests expect
- ☐ Working conditions: written confirmation of tasks, hours and fee before each tour
- ☐ Partner & Supplier Sustainability Code of Conduct: key points
- ☐ Information to give guests: customs, dress codes, protected areas, wildlife, water, plastic, buying local, forbidden souvenirs
- ☐ Protection of children: warning signs and how to report
- ☐ Safety: briefing before activities, first aid kit, weather checks, life jackets on boats
- ☐ Our 24/7 duty line (+382 67 035 255) and incident reporting
- ☐ Questions and suggestions from the guide

Annex B – Guide register

Name	Type of guide / licence	Languages	Code of Conduct received	Seasonal briefing (date)	Notes

Travel Twitch DMC d.o.o.
Headquarters: Vladimira Rolovića F2, 85000 Bar, Montenegro
Branch: 40 Nouvelle Way, Boston, USA
PIB 03483029 · PDV 80/31-04973-4 · Tour operator licence no. 655
+382 67 035 255 · +1 617 780 4728 · discover@thetraveltwitch.com
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COMPANY POLICY

Customer Communication Policy

Version 1.0

Policy information	Details
Applies to	Travel Twitch DMC d.o.o., headquarters in Bar, Montenegro, and branch in Boston, USA; all communication with clients, travel agents and guests, before, during and after their trip
Policy owner	Ivan Perčobić, Executive Director and Co-owner
Approved by	Ivan Perčobić, Executive Director and Co-owner (responsible person)
Review	Every October, together with our other sustainability policies
Available to	All staff on SharePoint

1. Purpose and scope

This policy sets out how Travel Twitch DMC communicates with its clients and guests: how we protect their privacy, how we market and describe our products, what information guests receive before and during their trip, and how we handle feedback and complaints.

Our clients are travel agents, tour operators and private and corporate travellers, many of them from North America and Europe. We communicate with them online: by email, video call, online presentations and our website.

2. Responsibilities

Role	Person	Responsibility
Responsible person	Ivan Perčobić, Executive Director and Co-owner	Approves this policy, decides on complaints that are not solved at first contact
Clients and partners	Rade Bogavac, CEO and Co-owner	Communication with clients and travel agents, especially in North America
Marketing and processes	Dragana Krivokapić, Head of Growth and Office Manager	Marketing activities and their accuracy, client feedback process
Offers and travel documents	Tijana Raičević and Damir Zagora, Project Managers; Lana Joketić, Travel Advisor	Clear offers, advice on sustainable options, final programmes and vouchers with the duty line and, from December 2026, the Responsible travel tips
All staff	Everyone who works with clients	Follow this policy, protect personal data, record feedback and complaints

3. Privacy and personal data

We protect our clients' and guests' personal data in line with the Montenegrin Law on Personal Data Protection, the GDPR where it applies, and, for our Boston branch, the applicable US law.

- As an online agency, we store all data only in secure online systems, with access limited to our team.
- We use guests' data only to organise their trip.
- We share with hotels, transport companies, guides and other suppliers only the data they need to deliver the service.
- Our Code of Conduct, which we are introducing with all suppliers, requires them to protect guests' personal data and use it only for the booked services.
- We keep personal data only as long as needed, and we never sell or share it for marketing by others.

4. Marketing and promotion

- Our website, social media, presentations and offers describe our services accurately and transparently.
- We use photos and descriptions that reflect what guests will really experience, and we do not promise more than we deliver.
- In our sustainability communication we describe only what we actually do, and we present planned measures as plans.
- We do not use the Travelife logo until we have received the Travelife award, as Travelife requires.

5. Product and destination information

Offers. Every offer states clearly:

- the services included and not included;
- the programme;
- the prices;
- the payment and cancellation terms;
- the validity of the offer.

Sustainability information, such as train, walking or e-bike elements and local family suppliers, is described accurately.

Destination information. The destination information in our proposals and programmes is factually correct and balanced, and it is prepared by our local team. Where relevant, it includes practical sustainability aspects, such as dress codes at monasteries, national park rules and busy times in Kotor and other old towns. Our licensed local guides explain the nature, culture and heritage of each place on tour.

6. Advice on sustainable choices

When we advise clients and agents personally, we suggest sustainable alternatives where they fit the brief:

- **Transport to the destination:** direct flights to the airport closest to the first and last hotel, such as Tivat, Dubrovnik or Podgorica, instead of connecting flights and long transfers; rail or ferry options where relevant.
- **Accommodation:** certified and locally owned accommodation.
- **Excursions:** excursions with local family producers and licensed local guides.
- **On the ground:** train, walking, e-bike and kayak options instead of road transfers and motorboats.
- **Packages:** our sustainable package, Montenegro Slow & Green.

Planned. We plan to start highlighting certified properties and sustainable options in our proposals with a clear mark.

7. Information for guests before and during the trip

Before arrival. With the final programme and voucher, every guest receives the following. We are introducing the Responsible travel tips from December 2026, so that all our guests receive them from the 2027 season:

- our 24/7 duty line, **+382 67 035 255**;
- our Responsible travel tips (Annex A).

The tips cover the main sustainability issues in Montenegro and how guests can help:

- respecting local culture;
- buying local;
- saving water and refilling bottles;
- protecting nature and wildlife;
- the law on illegal souvenirs;
- protecting children from sexual exploitation;
- sustainable ways to get around;
- health and safety.

During the trip.

- Our licensed guides repeat the key points on tour, give safety briefings before boat, hiking, cycling and other outdoor activities, and explain the rules at sensitive sites.
- For groups, we create a WhatsApp group with the guests and the guide.
- In an emergency, our Health, Safety & Crisis Management Policy applies.

Planned. We have prepared specific do's and don'ts for each type of sensitive excursion, and we plan to start giving them to guests. For now, guides give these rules verbally before each activity.

8. Our sustainability commitment

We inform our clients about our sustainability commitments and actions:

- on our website, where our Sustainability Policy is published;
- in conversations with agents and clients;
- in our proposals.

9. Customer satisfaction

- After each trip we ask the travel agent or client for feedback by email.
- Our guides report any issues or guest comments from the tour.
- During the trip, our team stays in contact with the guide and the group, so that problems can be solved on the spot.
- Feedback is discussed at our team meetings, and we take corrective actions, for example by changing a supplier, a restaurant or the timing of a programme.
- **Planned:** in 2027 we will add one or two questions on sustainability to our feedback requests, for example on local experiences and on our guides' information about nature and culture.

10. Complaints

We have a clear procedure for client complaints.

1. **During the trip:** guests can raise a complaint with the guide or on our 24/7 duty line, and we try to solve it on the spot.
2. **After the trip:** complaints are sent in writing by email to discover@thetraveltwitch.com.

3. **Confirmation:** we confirm receipt within 2 working days.
4. **Answer:** we send a written answer within 8 days, with the outcome and any compensation.
5. **Record and learn:** each complaint and the action taken are recorded in the complaints log (Annex B) and discussed at our team meetings, so we can prevent the same problem in the future.

Complaints that cannot be solved by the team are decided by the Executive Director.

11. Review

Every October the Executive Director reviews this policy, the feedback received and the complaints log, together with our other sustainability policies.

Version	Change	Approved by
1.0	First issue	Executive Director

Approval.

Name	Role	Signature
Ivan Perčobić	Executive Director and Co-owner, responsible person	

Annex A – Responsible travel tips (sent with the final programme from December 2026)

Responsible travel in Montenegro – a few tips from Travel Twitch DMC

- **Respect local culture:** cover your shoulders and knees in monasteries and churches, and ask before you photograph people.
- **Buy local:** eat at family restaurants and buy food and crafts directly from the people who make them.
- **Save water:** water is precious on the coast in summer. Refill your bottle where tap water is safe instead of buying plastic.
- **Protect nature:** stay on marked trails in national parks, take your rubbish with you, never feed or approach wild animals, and do not fly drones in protected areas.
- **No illegal souvenirs:** buying, selling or taking out of the country products made from protected plants and animals, such as coral, date mussels, noble pen shells or turtle products, or historic, archaeological or religious artefacts, is illegal without a permit.
- **Protect children:** the sexual exploitation of children is a serious crime. Please do not give money or sweets to children. If you see a child at risk, call the police (122 or 112) or us.
- **Get around sustainably:** explore old towns on foot, and try the train between Bar, Virpazar and Podgorica, the intercity buses along the coast or the Kotor–Lovćen cable car.
- **Stay safe:** in an emergency call 112. Protect yourself from the summer sun, wear a life jacket on boats, and check the weather before going into the mountains.
- **We are here for you 24/7:** +382 67 035 255.

Annex B – Complaints log

Date received	Client / group	Complaint	Received by	Receipt confirmed	Answer sent	Outcome and action