

## ETHICAL CODE | HOSPES GROUP

### 1.- INTRODUCTION AND AREA OF APPLICATION

The base of our company is the provision of hospitality services, and therefore, our main asset is customers.

Our hotels are a reference in quality and our clients trust in the service we offer and in our ethics in the application.

Therefore, this Ethical Code is addressed to:

- The Board of Directors, since they will be the ones that mark the principles and values of the company.
- CEO, Directors, Heads of Department, who will be those who apply the principles and decisions of the Board of Directors.
- To all the staff of the company.
- Clients, suppliers and any third party that has a contractual relationship.

In this Code, the behaviors that are expected of our company are going to be determined, and that they have to lead the sector being a model to be followed by all our staff, and especially for those who can significantly influence it, through the Management and the Board of Directors.

Regardless of our commitments, the company is obliged to comply with the legislation, and this Ethical Code. Therefore, compliance manuals and policies have been developed in the areas that affect our workers, partners, clients and stakeholders, implementing a prevention model that allows reducing the risks in the commission of crimes and regulatory breaches, or minimizing by means of a compliance model, the effects of its commission through a procedure of detection and management of incidents, which are developed through our policies and procedures.

The previous Obligated Subjects cannot contravene this code by relying on an order from a superior, or ignorance of this Code, and for this Hospes will ensure the training and dissemination to all involved, resolving doubts and linking, to the extent that the legislation allow it, to all its employees in compliance with the principles and values that are reported below.

### 2.- HOSPES ATTITUDE

A smile is part of the uniform.

The Hospes staff will be honest and responsible, educated and respectful with the clients and visitors, with the team members and with the environment.

The Hospes team will take initiative and will combine all their efforts to make decisions that allow exceeding at all times the expectations of the client.

All personnel, regardless of the department to which it corresponds, will take care to ensure the perfect state of the facilities.

The Hospes staff will be true to our Hospes culture and values and will know and respect the quality standards of the chain, as well as the different establishments of the group, the location, services, category, and building type, among others. Or the history around the establishments, activities and points of interest developed in the work area.

Public spaces belong to the guest. Consequently, the personnel will be especially cautious in their use, limiting it to the use strictly necessary for service reasons and enhancing the exclusive character of the site.

The Hospes staff will anticipate the needs of the guests, showing their concern for them, as well as knowing their tastes and preferences and showing interest.

The staff will not discuss publicly any issue of clients, colleagues, work or any other aspect.

The Hospes staff will combine all their efforts to allow Hospes to represent a pleasant experience for their client.

### **3.- PRINCIPLES, VALUES**

The principles and values of Hospes, which in this document are collected, define the compliance culture and the company's commitment to the principles of conduct, business and personal ethics.

HOSPES is a company that believes in all its professionals, and for that reason we want to support them in:

Be whole, objective, ethical and work with the rigor and professionalism that each position requires.

Inform and train in the culture of respect among all of them, where there is no discrimination or harassment and where we are all treated with respect and dignity.

Offer a safe and healthy work environment.

Commitment to the company to protect its reputation.

Growing the quality of our services.

We also commit ourselves with our clients in:

Provide a service according to the quality that is expected of us.

Protect the confidentiality of the data of our clients and employees.

For all these reasons, HOSPES has developed a series of policies, protocols and standards for work and compliance.

It is the company's commitment, to generate a culture of compliance and respect, and every day work will be done to improve and monitor this culture, implementing policies, rules, protocols and controls that improve the compliance system, so all these documents will be manuals always alive, given the legal modifications, improvements, controls, implementation systems, etc., that each day will make the compliance culture a principle pillar of the company.

Integrity is the main value under which this ethical code is based and therefore:

We will not accept gifts that make us lose objectivity and that violate the commitments of this code, neither with customers nor with employees.

Any personal situation that may cause a conflict of interest at work will be declared and avoided.

When an Obligated Subject acts on behalf of HOSPES, it will refrain from having a personal position that contravenes this code.

We comply scrupulously with the law, the consumption of tobacco and alcohol, is prohibited for HOSPES personnel within their facilities.

Honesty in all actions, especially with our customers, suppliers and with the rest of the employees.

Transparency in all acts and processes.

Teamwork and respect for all company personnel, therefore, any attitude of harassment or discrimination will be rejected, having absolute respect for the rules of immigration, avoiding illegal trafficking in labor, abuse of authority or any attitude that could result in humiliating or discriminatory treatment.

HOSPES will promote the personal and professional development of its employees, encouraging their involvement in the improvement of their own abilities and ensuring a safe work environment.

Respect for the environment.

Fidelity to the company and the principles of it.

Confidentiality of the information we receive from the company, as well as from the clients, being scrupulous in the protection of their data.

#### **4.- OUR COMMITMENTS**

##### **OUR EMPLOYEES AND DIRECTORS**

Our labor policy will promote a safe and stable work environment that avoids discrimination and any type of harassment.

Undesirable behaviors that only cause humiliation and that generates in our staff an undesired environment will be avoided.

The staff will take special care with the rumors and gossip that denigrates and dishonors as people and as partners.

#### OUR CLIENTS

Our CLIENTS are our asset. We will not use the data of our colleagues, customers or third parties, unless express consent. The satisfaction of the CLIENT is a priority, our efficiency is our best poster, and the care in the treatment and the culture of quality distinguish us.

Access to customer credit / debit cards will be treated with special diligence. We will not remove the customer's card from your presence. We will not make personal transactions with them, or the customers themselves as a favor.

#### OUR PROVIDERS

Our purchasing policy follows established criteria and is committed to this Code. The evaluation and selection of suppliers is essential for compliance with this code, avoiding suppliers that do not respect human dignity or risk the reputation of HOSPES.

Unethical behaviors, such as any activity that encourages prostitution or corruption of minors, money laundering, fraud or financing of criminal organizations, will be avoided.

We will oblige our suppliers to take responsibility for the companies that subcontract to do work in HOSPES.

#### OUR COMPETITORS

Our competitors demand transparency and commitment. We will not carry out deceptive advertising, nor will we denigrate our competition with lies to be better. We distinguish ourselves by our treatment and efficiency.

#### OUR SHAREHOLDERS

Our shareholders want us to provide value, we will inform them honestly, without allowing them to have a judgment of our company different from reality.

#### RESPONSIBILITIES

All the team, from the Board of Directors to the last professional of the company, should be individually responsible for ensuring the compliance with the Ethical Code, standards, policies, protocols and controls implemented in the company, to generate a culture of compliance within it, and therefore we expect from our professionals:

- Stay informed, using all the resources of the company.
- Assume responsibility, in order to achieve the objectives of this Code.
- Inform about the problems that arise in the day to day, and express your suggestions for improvement.

- Give an example of integrity with the principles collected here, supporting each other, to develop exemplary, fair and coherent norms and respond to any type of natural error that may occur.
- Any situation in which a breach of the policies, protocols and other internal rules of the company is known or assumed, if another partner or professional, clients or third parties that are linked to the company is suspected.
- You must inform through the complaints email, [denuncias@hospes.com](mailto:denuncias@hospes.com)

## **5.- CORPORATE SOCIAL RESPONSIBILITY**

As Corporate Social Responsibility, Hospes bets for the "Proyecto Sueños" (Dreams Project) which is a non-profit social initiative that has been developed with the aim of sharing with the most disadvantaged, giving value to the word "dreams", facilitating with the contribution to these people to have their dreams reached.

The project has two aspects:

**VITALITY:** Helping young people of the organization Aldeas Infantiles SOS to achieve their personal and professional dreams.

**ILLUMINATE:** Helping thousands of people with limited resources to regain sight. In collaboration with "Ojos del Mundo" (Eyes of the World).

How Hospes helps? With every reservation made in our website, 1 euro will be donated to the Dreams Project, divided between Aldeas Infantiles SOS and Eyes of the World.

## **6.- ENVIRONMENTAL SOCIAL RESPONSIBILITY**

Hospes focuses its activity in such a way that it enhances its positive environmental impacts and eliminates or mitigates the negative ones, which will improve its competence and environmental sustainability.

**Efficiency in the consumption of resources:** the inefficient consumption of resources entails an unnecessary expense, the most efficient use of resources will itself be a cost saving. From a solidary perspective, we strive to eliminate or minimize the consumption of energy resources using systems that guarantee sustainable use, as well as the subsequent recycling. Likewise, energy efficiency equipment, use of LED bulbs, double-flush tanks to reduce water consumption, promotion of the reuse of towels and bedding to reduce the use of detergents, concentrated detergent dosing systems are used. In order to make a rational and less aggressive use with the environment.

**Waste generation and management:** As a responsible company, Hospes minimizes the generation of waste as a consequence of the activity, and manages in the least harmful and most environmentally friendly manner. Its usual practice includes the recycling of materials such as glass, paper-cardboard, packaging-plastics and organic matter, the recycling of used batteries, the recycling of lights (halogen, low consumption, fluorescent and LED), separation by decantation and treatment of oils and fats of vegetable and animal origin for further purification and transformation, among others.

## **7.- HOW TO PROCEED BEFORE A NON-COMPLIANCE**

If you believe that there has been a breach of the Ethical Code, regardless of the degree of non-compliance, you must communicate it through our ETHICAL CHANNEL available for the company: [denuncias@hospes.com](mailto:denuncias@hospes.com)

The complaints received by this channel will be investigated under an action protocol, which is developed in the Complaints Channel Protocol.

All complaints received will be examined carefully, and under the principle of non-reprisal and confidentiality, where no professional will be harmed as long as they act in good faith.

Likewise, any employee may put him in communication with the person he deems most appropriate within the company, and for this reason, we inform him of some examples:

The hierarchical superior

Hotel Director

The Director of Human Resources

CEO

## **8.- FOLLOW UP**

The incidents regarding the Code of Conduct will be recorded in the Compliance Committee to be evaluated by those responsible for the follow-up. This initiative is a process, for which the Committee will follow and develop all aspects that must be carried out to improve and monitor this Code.

## **9.- ACCEPTANCE, COMPLIANCE AND DISSEMINATION OF THE ETHICAL CODE**

All the Directors of this company have the obligation to:

- Implement the dissemination, with the HR Department, of the knowledge of this Code, leading its compliance through the example.
- Communicate breaches of this Code.
- Communicate the measures that are adopted in this matter, being proactive to enrich the culture of compliance.

All HOSPES professionals are obliged to comply with this Ethical Code, and any breach must be corrected immediately, sanctioning those that proceed in accordance with current labor regulations.

What these pages collect are a series of guidelines or milestones, which should serve to guide professionals in making decisions in complex or sensitive moments.

There are other internal documents (policies, protocols and standards of work and compliance) and regulations that should be known by all professionals. The present Code, like the rest of policies, norms and protocols, are protected by a series of mechanisms of update, control and internal audit that allow to guarantee their fulfillment

and grant them credibility. They will be documents that will have to be reviewed in the Ethics Committee.

It is necessary to inform and train all the obligated subjects in this Code of Conduct, which must be accepted and put into practice. To this end, HOSPES is committed to guaranteeing that its recipients will be aware of the scope of this Code, delegating to the Human Resources Department the organization of its dissemination.

If there is a breach by professionals, both the Ethical Code, and any policy, standard or protocol, this may be evaluated and taken into account when deriving disciplinary sanctions.

In addition, all professionals must conduct training courses on the Code and Ethical Channel.

For new workers, suppliers and collaborators, this Code will be part of their work contract as an inseparable obligation.