

Declaration of the Code of Ethics

General principles

The aim of **Catalonia Hotels & Resorts'** Code of Ethics is to help everybody who engages with the Company in their daily business to act ethically, in line with the principles and values adopted by **Catalonia Hotels & Resorts**. These principles and values are invaluable for good decision-making and conducting business, as a result of which abiding by them is mandatory. Their breach could prompt the enforcement of disciplinary measures and contractual obligations that may apply in accordance with the laws and Collective Bargaining Agreements in force.

The scope of application of the Code of Ethics extends to everyone who has a relationship with **Catalonia Hotels & Resorts**, without any exceptions whatsoever, regardless of their position or function, as well as of their geographic location and functional responsibilities. Furthermore, its enforcement, whether total or partial, may extend to all of the Company's Stakeholders, namely, customers, suppliers, and all natural and legal persons that have entered into any kind of relationship or partnership with the Company, whenever so arranged in order for them to perform their remit, provided this is possible on the basis of their relationship.

General commitments

The Code of Ethics contains the general commitments that **Catalonia Hotels & Resorts** has taken on board and they apply to all business conducted by the Company. Amongst them, the following should be highlighted:

- The commitment to **comply with the internal regulations** and good practices adopted by the Company.
- The commitment to act with **integrity and honesty** in all relations with third parties in line with the principle of **good faith**, whereby all conduct must be aligned with the legal provisions established by the laws in force, in addition to **respecting human rights** at all times.
- The commitment to **equal opportunities and non-discrimination**, thus ensuring that selection and promotion processes are based on objective personal assessments at all times.
- The commitment to **compliance with health and safety at the workplace** to ensure a safe and stable working environment through the implementation of the occupational health and safety measures required for employees to do their jobs properly.
- The firm commitment to the **fight against money laundering and the financing of terrorism**.
- The commitment to **respect intellectual and industrial property rights**, whether those of the Company or of third parties.
- The commitment to **respect for the privacy** and the **confidentiality of personal data** of all individuals who have dealings with the Company, whether they are employees, customers or suppliers, who provide their

personal data or information of a private nature, based on the principles of non-disclosure and privacy.

- The commitment to the **good use of IT media**.
- The commitment to respect for the **rules on fair competition and the consumer market**.
- The commitment to **avoid** all situations that could **give rise to a potential conflict of interest**.
- The commitment to **abide by the legislation in force** and the Company's **internal regulations in dealings with public authorities**.
- The commitment to **compliance with tax and social security obligations**.
- The firm commitment to **respect for and the protection of the environment** in conducting day-to-day business.
- The commitment to compliance with the laws on **public health**.

Department of Internal Audit, Risks and Compliance and the Ethical Channel

In order to ensure compliance with the principles and values in the Code of Ethics, as well as other internal regulations, the Department of Internal Audit, Risks and Compliance has been granted the powers required to monitor the smooth running of **Catalonia Hotels & Resorts'** Internal Compliance system.

Furthermore, an internal reporting system – the Ethical Channel – has been set up for any conduct that may entail a violation of **Catalonia Hotels & Resorts'** Code of Ethics and other internal regulations, in addition to providing a means for submitting any enquiries that may arise in the implementation of any of the principles in these regulations.

Anyone who becomes aware of any breaches is responsible for reporting them. All reports submitted through the Ethical Channel will be dealt with in the utmost confidence, as well as ensuring that no reprisals will be taken in the case of reports made in good faith. To this regard, for anyone who wishes to obtain further information about how the Ethical Channel is run, **Catalonia Hotels & Resorts** has a Policy on the Ethical Channel, which ensures that the measures that uphold the rights of any people that may be involved in a report are effectively implemented. It is available for consultation on the corporate website.

This Declaration of the Code of Ethics is a brief summary that outlines the information in the Code of Ethics. Therefore, if you would like further information about it or access to the full document, you should send a request to the following email: canal.etico@cataloniahotels.com.