# **STAYINGVALENCIA**

## **EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L.**

## CODE OF ETHICS AND CONDUCT

#### EMPRENDIMIENTOS HOSTELEROS VALENCIA

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#### Principles

1.1 At EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L., we aim to be a sustainable success and we know that success will not endure if it is not based on good business practices. Therefore, we want our success to be based on the principles of:

- Responsibility: performing our activities with integrity, efficiency, and proactivity.

- Respect: Recognizing and respecting individual differences as the basis of coexistence, whether based on sex, race, religion, nationality, disability, social or economic class, or professional training.

- Professional Ethics.
- Integrity.
- Honesty.
- Loyalty.
- Efficiency.

- Continuous Improvement: Planning, controlling, involving, and raising awareness among our staff and collaborators.

1.2 Our Code of Ethics and Conduct is an explicit declaration of the principles, values, and guidelines that should inspire and guide the behavior of people integrated into the company in their professional activities.

1.3 These principles and values describe the behavior we expect from our executives and employees.

1.4 This Code aims to share with the people within the company the corporate principles that are part of the culture of good practices. To this end, we develop behavior models based on these principles, contributing also to the prevention of actions contrary to the law.

1.5 Zero Tolerance Principle, integrated into the organizational culture DNA, to avoid any type of gender-based discrimination in labor relations, not tolerating any behavior contrary to the freedom, dignity, and physical and mental integrity of employees, clients, suppliers, collaborators, and any other person linked to the company. To avoid actions against sexual freedom, including sexual assault, sexual and moral harassment, sexual extortion, and digital sexual violence. Applying a diligent preventive and reactive policy against them.

A Protocol Against Sexual Harassment and Harassment based on gender and a procedure against moral, sexual, gender-based harassment or workplace violence is also implemented as part of this Ethical Code.

1.6 The ultimate goal of our Code of Ethics and Conduct is to foster a responsible work environment beyond legal requirements for all members of our business organization, from whom the highest level of ethical behavior and integrity is expected.

#### Scope

1.7 The development of this Code of Ethics and Conduct originated from the initiative of the management body of EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L.; however, the entire management team and all employees commit to sharing its implementation and making it their own, working towards its dynamic integration until its full consolidation into the corporate culture.

1.8 This code applies to the following individuals:

- (1) Company partners.
- (2) The management body.
- (3) Executives.
- (4) Employees.
- (5) Associated persons.

#### **Objectives of the Code of Ethics and Conduct**

1.9 The objectives of our Code of Ethics and Conduct include the following areas of action (all are interrelated and guide our actions):

- (a) Personal responsibility.
- (b) Compliance with the law.
- (c) Relations with colleagues.
- (d) Relations with clients and suppliers.
- (e) Professional development and training.
- (f) Health and safety at work.
- (g) Prevention of money laundering.
- (h) Respect for individuals.
- (i) Honesty and integrity in business.

- (j) Transparency.

- (k) Environmental responsibility.
- (I) Social responsibility.
- (m) Right to privacy.
- (n) Confidentiality and use of company information.
- (o) Use and protection of company and third-party assets.

1.10 We are committed to the Ethical Code of the World Tourism Organization (UNWTO). This Code, adopted in 1999 by the UNWTO Assembly, encompasses 10 principles covering the economic, social, cultural, and environmental components of travel and tourism, designed to guide key tourism development stakeholders. It aims to maximize sector benefits while minimizing its impact on the environment, cultural heritage, and local communities. Known as the Manifesto of the Responsible Traveler, it is a guide of 10 basic guidelines for practicing responsible tourism, promoted by the InterMundial Foundation to show the benefits of tourism to society and the environment, fostering responsible tourism development and rewarding initiatives favoring excellence and commitment that the tourism industry maintains with the socio-economic and environmental context.

#### PRINCIPLES OF THE GLOBAL CODE OF ETHICS FOR TOURISM

Article 1: Contribution of tourism to mutual understanding and respect between peoples and societies.

Article 2: Tourism as an instrument for personal and collective development.

- Article 3: Tourism as a factor of sustainable development.
- Article 4: Tourism as a factor of exploiting and enriching the cultural heritage of humanity.
- Article 5: Tourism as a beneficial activity for host countries and communities.
- Article 6: Obligations of tourism development stakeholders.
- Article 7: Right to tourism.
- Article 8: Freedom of tourist movement.
- Article 9: Rights of tourism sector workers and entrepreneurs.
- Article 10: Implementation of the principles of the Global Code of Ethics for Tourism.

#### We are responsible when we follow ethical principles.

1.11 Individuals associated with EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L. must accept personal responsibility for complying with the Compliance Manual and this code. To this end, they must take the time to read and understand them and know the consequences of their non-compliance.

1.12 Especially, their main duties include:

- (1) Perform their respective functions with honesty, care, diligence, professionalism, and integrity.

- (2) Commit to always act correctly.

- (3) Understand their belonging to the company as a commitment to being part of a work team and that failing this commitment means failing the team.

- (4) Always do what is promised.

- (5) Be honest and not look for an excuse not to be.

- (6) Be orderly in their person and work.

- (7) Not undertake commitments or make promises of any kind, knowing that they harm the company's interests.

- (8) Understand and accept that non-compliance with the rules is not an option within the business risk framework.

- (9) Report to the management body any act known to them that involves waste, fraud, abuse, or corruption.

#### We comply with current legislation.

1.13 EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L. is committed to rigorously complying with the laws.

1.14 All individuals belonging to the company must act with absolute respect for current legal regulations and especially avoid criminal behavior. To this end, they must take the time to read and understand them and know the consequences of their non-compliance.

#### 5.3 Especially, individuals subject to the compliance manual must:

- 5.3.1.1 Know and understand the compliance manual and company policies.

- 5.3.1.2 Comply with the obligations, guidelines, and prohibitions developed in the company policies.

- 5.3.1.3 Access own or third-party IT systems with absolute respect for the law.

- 5.3.1.4 Maintain accurate, rigorous, complete, and absolutely transparent accounting and financial records, recording all company transactions completely and in accordance with generally accepted accounting principles and applicable accounting regulations.

- 5.3.1.5 Respect intellectual and industrial property rights of the company and third parties.

- 5.3.1.6 Maintain confidentiality and secrecy of all information (own or third-party) obtained in the exercise of professional or labor activity within the company.

- 5.3.1.7 Inform management of any known breach of the law, compliance manual, and code of ethics and conduct.

- 5.3.1.8 Inform management of any known risk behavior not included in company policies.

### 6. We foster personal relationships with colleagues.

6.1 Ethical conduct begins with oneself; therefore, the most valued asset by EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L. is the personal relationship of all those who are part of EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L. Thus, achieving a good work environment is our primary objective.

6.2 It is only possible to appreciate each individual's contribution if we have a good work environment, good personal relationships, good organization, good emotional health, and act in a climate of trust and confidence. Therefore, it is essential:

(1) Not to tolerate any form of violence, discrimination, harassment, or inappropriate behavior, whether it be verbal, physical, or psychological.

- (2) To treat colleagues, clients, and collaborators with respect and dignity.
- (3) To promote an inclusive work environment where diversity is valued and respected.

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## 7. Relations with clients and suppliers.

7.1 Our relationship with clients and suppliers must be based on trust and mutual benefit.

7.2 We must comply with the commitments and obligations contracted with clients and suppliers.

7.3 We will promote transparent, ethical, and fair commercial practices.

7.4 We will not tolerate any form of corruption or bribery in the relations with clients and suppliers.

7.5 We will ensure the confidentiality of any information received from clients and suppliers and use it responsibly.

7.6 We will select suppliers based on their ability to meet our standards for quality, service, price, and ethical conduct.

7.7 We will encourage suppliers to adopt principles and practices consistent with our own.

7.8 We will strive to resolve any disputes or issues with clients and suppliers promptly and fairly.

#### 8. Professional development and training.

8.1 We are committed to the continuous professional development and training of our employees.

8.2 We will provide opportunities for learning and development to enhance the skills and competencies of our employees.

8.3 We will support employees in achieving their career aspirations and professional goals.

8.4 We will foster a culture of learning and knowledge sharing within the organization.

8.5 We will ensure that employees have access to the resources and support needed to perform their roles effectively.

#### 9. Health and safety at work.

9.1 We are committed to providing a safe and healthy work environment for our employees.

9.2 We will comply with all applicable health and safety regulations and standards.

9.3 We will identify and mitigate any risks to health and safety in the workplace.

9.4 We will provide training and resources to employees to ensure they understand and can follow health and safety procedures.

9.5 We will encourage employees to take responsibility for their own health and safety and that of their colleagues.

9.6 We will promote a culture of health and safety within the organization.

#### 10. Environmental protection.

10.1 We are committed to minimizing our environmental impact and promoting sustainability.

10.2 We will comply with all applicable environmental regulations and standards.

10.3 We will implement practices and procedures to reduce our environmental footprint.

10.4 We will promote awareness and understanding of environmental issues among our employees.

10.5 We will encourage employees to take responsibility for their own environmental impact.

10.6 We will strive to use resources efficiently and reduce waste.

10.7 We will seek to minimize our carbon footprint and promote energy efficiency.

10.8 We will promote sustainable practices and encourage our suppliers and clients to do the same.

#### 11. Money laundering prevention.

11.1 We are committed to preventing money laundering and complying with all applicable laws and regulations.

11.2 We will implement policies and procedures to detect and prevent money laundering activities.

11.3 We will provide training and resources to employees to ensure they understand and can follow money laundering prevention procedures.

11.4 We will report any suspicious activities or transactions to the appropriate authorities.

## 12. Right to privacy.

12.1 We respect the right to privacy of our employees, clients, and suppliers.

12.2 We will comply with all applicable data protection laws and regulations.

12.3 We will implement practices and procedures to protect personal data and ensure its confidentiality.

12.4 We will only collect, use, and store personal data for legitimate business purposes.

12.5 We will ensure that personal data is accurate, complete, and up-to-date.

12.6 We will provide employees, clients, and suppliers with access to their personal data and allow them to correct or delete inaccurate information.

## 13. Confidentiality and use of company information.

13.1 We are committed to maintaining the confidentiality of company information.

13.2 We will implement practices and procedures to protect company information from unauthorized access or disclosure.

13.3 We will only use company information for legitimate business purposes.

13.4 We will ensure that company information is accurate, complete, and up-to-date.

13.5 We will report any unauthorized access or disclosure of company information to the appropriate authorities.

#### 14. Use and protection of company assets.

14.1 We are committed to protecting the assets of the company.

14.2 We will implement practices and procedures to safeguard company assets from loss, theft, or misuse.

14.3 We will only use company assets for legitimate business purposes.

14.4 We will ensure that company assets are used efficiently and responsibly.

14.5 We will report any loss, theft, or misuse of company assets to the appropriate authorities.

#### 15. Conflict of interest.

15.1 We are committed to avoiding conflicts of interest in our business activities.

15.2 We will implement practices and procedures to identify and manage conflicts of interest.

15.3 We will ensure that employees disclose any potential conflicts of interest to the appropriate authorities.

15.4 We will take appropriate measures to address conflicts of interest and prevent them from affecting our business activities.

15.5 We will promote a culture of transparency and integrity in managing conflicts of interest.

#### 16. Code Effective Date and Acceptance.

16.1 This Code of Ethics and Conduct is effective as of the date of its implementation.

16.2 All employees, partners, and associated persons are required to accept and comply with this Code of Ethics and Conduct.

16.3 We will provide training and resources to ensure that employees understand and can follow this Code of Ethics and Conduct.

16.4 We will regularly review and update this Code of Ethics and Conduct to ensure its relevance and effectiveness.

By adhering to these principles, we will foster a culture of integrity, responsibility, and excellence within EMPRENDIMIENTOS HOSTELEROS VALENCIA, S.L., and contribute to the sustainable success of our organization.