

Governance Pillar

Positive impact begins with how
we make decisions.

Introduction

At deLuna Hotels we see governance as the foundation that supports the way we work. It is not only about complying with rules, but about making decisions ethically, responsibly, transparently and in line with our values.

A sustainable company needs a solid structure, but it also needs an internal culture able to listen, learn, correct course and move forward. That is why we work to ensure that every decision, from the most strategic to the most everyday, reflects our commitment to people, the environment, quality and continuous improvement.

Our governance rests on clear principles: integrity, responsibility, equality, participation, regulatory compliance, transparency, active listening and responsible innovation.

Because we believe that real positive impact begins long before any specific action: it begins in the way we decide to do things.

Management based on values

The way we manage comes from a shared culture. At deLuna Hotels we believe in an organisation that is close, demanding and responsible, where decisions are not made with only the short term in mind, but with an eye on the impact they have on people, guests, suppliers, the community and the future of the company.

Honesty, respect, consistency, continuous improvement and a focus on service are part of how we work. These values help us maintain relationships built on trust and build a company that is stronger, more human and better prepared to face the challenges of the tourism sector.

For us, good governance means acting responsibly even when nobody is watching.

“Acting responsibly, even when nobody is watching.”





Ethics, compliance, and responsibility

deLuna Hotels' ethical commitment is articulated through a clear and shared regulatory framework, which guides the behavior of all people who are part of the organization. Our Code of Ethics and our Code of Conduct outline the principles that should guide our daily activities, both in our relationships with our guests and with our team, suppliers, collaborators and other stakeholders.

We also have internal protocols and commitments that reinforce this culture of integrity, including:

- **Anti-corruption protocol.**
- **Harassment prevention protocols.**
- **Corporate commitments and responsible declaration.**
- **Purchasing Department Code of Conduct.**
- **Policies of equality, diversity and mutual respect.**

These documents are not just formal tools. They are a practical guide to ensure that our activity is carried out with transparency, responsibility, and respect.

People, equality and ethical culture

Good governance begins with taking care of how we relate to each other within the organization.

At deLuna Hotels, we promote a work environment based on equal opportunities, respect, and diverse perspectives. We believe that a variety of backgrounds, experiences, and ways of thinking enriches decision-making and strengthens our internal culture. We work to build an organization where everyone feels heard, valued, and treated fairly, regardless of their position, department, or responsibility.

This vision is reflected in our equality policies, our anti-harassment protocols, and a zero-tolerance policy towards any conduct contrary to our values.

“*Good governance begins with taking care of people.*”





A culture where ideas can come from anyone

At deLuna Hotels we believe that the best ideas don't follow organizational charts. That's why we foster a culture where any member of the team, regardless of their position or responsibility, can propose improvements and even lead projects when they identify with them and believe they can add value.

Many advances arise precisely from that involvement: people who detect an opportunity, believe in an idea and decide to promote it.

We believe in leadership based on commitment, not just on the position. When someone on the team wants to contribute, our responsibility as an organization is to listen, support, and facilitate the growth of that initiative.

This way of working encourages participation, strengthens the sense of belonging, and makes continuous improvement a shared endeavor.

“The best ideas don't understand organizational charts.”

Mistakes as an opportunity to learn

Our culture of continuous improvement is based on a very clear idea: mistakes are welcome when they help us learn.

We're not looking for an organization where mistakes are never made. We're looking for an organization capable of detecting them, analyzing them, sharing them, and transforming them into learning.

When an incident is reported naturally, it becomes an opportunity to review processes, improve procedures, and prevent it from happening again.

This way of working requires trust. That's why we promote an environment where people can contribute, ask questions, try new solutions, and learn without fear.

Because only an organization that learns from its mistakes can truly continue to improve.

“*Learning is also a way to move forward.*”





Active listening and participation

Good governance also involves listening.

We listen to our guests through their ratings, reviews, surveys, follow-up calls, and conversations during their stay. Every piece of feedback helps us better understand what we're doing well and where we need to improve.

We also listen to our team, because those involved in daily operations have firsthand knowledge of many opportunities for improvement. Internal meetings, working groups, communication channels, and cross-functional initiatives allow us to gather ideas, identify needs, and turn them into action.

Active listening is not just a management tool. It's a way to respect people and make better decisions.

“Listen better to decide better.”

Continuous improvement and data-driven decision making

At deLuna Hotels we believe that what gets measured can be improved.

That's why we work with indicators that help us evaluate our progress in key areas such as guest satisfaction, online reputation, operational efficiency, sustainability, training, digitalization and service quality.

The use of digital tools, management platforms, and dashboards allows us to make more informed decisions, prioritize actions, and track results.

This culture of measurement helps us move from intuition to evidence, without losing the closeness that characterizes our way of working.

Measuring doesn't mean dehumanizing management. It means understanding reality better in order to provide better care.

“*Measuring is not dehumanizing. It's about getting to know each other better in order to provide better care.*”





Responsible innovation

Innovation is part of our governance because it directly influences how we work and how we make decisions.

At deLuna Hotels, we incorporate technology, automation, artificial intelligence, and digital tools with a clear objective: to improve the guest experience, facilitate the team's work, and make the organization more efficient.

But innovation must always be at the service of people.

That's why we see technology as an ally, not a substitute for human interaction. Its value lies in freeing up time, reducing repetitive tasks, improving processes, and allowing our team to focus on what truly makes a difference: taking care of the customer.

For us, innovation isn't about doing more things. It's about doing them better.

“Innovation isn't about doing more things. It's about doing them better.”

Sustainability and Shared Commitment Committee

Sustainability at deLuna Hotels is not the responsibility of a single person or department. It is a cross-cutting commitment that involves the entire organization. Our Sustainability Committee allows us to organize, promote and review initiatives linked to the different pillars: environmental, social, cultural, economic and governance.

This space fosters participation, project monitoring, and the identification of new opportunities for improvement. It also helps to maintain a strong commitment to sustainability within the company and to consistently integrate it into daily operations. Because sustainability only works when it becomes a shared culture.

“Sustainability only works when it becomes a shared culture.”



Responsible relationship with suppliers and collaborators

Our management style is also reflected in our relationships with our suppliers and partners.

We seek stable, transparent relationships based on trust, compliance, and mutual benefit. Whenever possible, we prioritize local suppliers and companies that share our values of quality, responsibility, and sustainability.

The purchasing department has its own criteria and commitments that help ensure an ethical, planned, and responsible relationship with our value chain.

We believe that a company cannot be sustainable in isolation. It needs to build responsible partnerships with those who are part of its daily operations.

“A sustainable company is also built with responsible partnerships.”



Quality, safety and trust

The trust of our guests is one of our main assets.

That is why we work with procedures aimed at guaranteeing the quality of service, the safety of people, data protection, confidentiality of information and compliance with applicable regulations.

Governance is also present in the way we manage incidents, review processes, train the team, and anticipate risks.

Each well-defined procedure helps to deliver a safer, more consistent, and more reliable experience.

“Trust is also built with well-defined processes.”





Transparency and accountability

Transparency is key to building trust.

That's why we communicate our commitments, regularly review our policies, and make the most relevant information about how we work available to our stakeholders.

We also understand that transparency involves acknowledging what still needs improvement. Sustainability isn't about presenting a perfect image, but about demonstrating a genuine commitment to progress.

We want to share what we do, but also continue learning what we can still do better.

“Transparency is not about showing perfection, but about real commitment.”

Certifications and external review

Our management model relies on external tools that help us evaluate our performance and identify opportunities for improvement. Bioscore certification allows us to measure, compare, and improve our sustainable management through objective indicators. It's a tool that helps us organize information, analyze consumption, review progress, and make more informed decisions. Furthermore, our Autism Friendly certification reinforces our commitment to more accessible, empathetic hospitality that is prepared to meet diverse needs. These certifications are not an end point. They are tools that help us continue to evolve.

“Certifications are not an end point, but a tool to continue improving.”





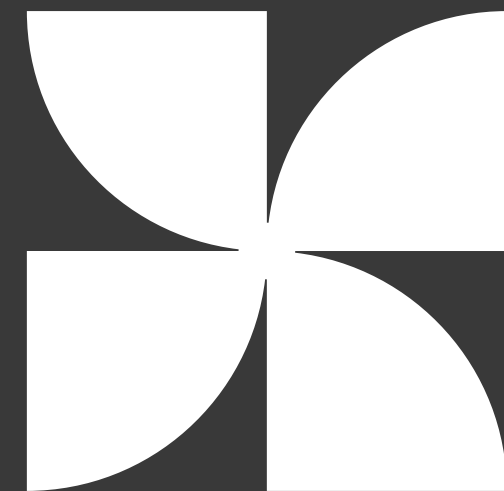
Looking to the future

We will continue to strengthen governance based on ethics, transparency, participation and continuous improvement.

We will continue to foster a culture where people can contribute ideas, lead projects, and learn from mistakes. We will continue to rely on data, indicators, and digital tools to make better decisions. And we will maintain our commitment to responsible, consistent management aligned with deLuna Hotels' values.

Because sustainability depends not only on what we do, but on how we choose to do it. At deLuna Hotels we understand good governance as the commitment to manage responsibly today to continue generating trust, value and a future tomorrow.

“Manage responsibly today to generate trust, value and a future tomorrow.”



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