

## CODE OF CONDUCT & ETHICS



<b>Scope of application</b>	HIPERION HOTEL GROUP, S.L. (VIBRA HOTELS)
<b>Titleholder of the Code</b>	HIPERION HOTEL GROUP, S.L. (VIBRA HOTELS)
<b>Approval</b>	Governing body of HIPERION HOTEL GROUP, S.L. (VIBRA HOTELS)
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## 1. Introduction

HIPERION HOTEL GROUP, S.L., which operates under the commercial name "VIBRA HOTELS" (henceforth referred to as the "Company" or "HIPERION"), is strongly committed to a culture of legal compliance, and it aspires to guarantee and comply with ethical practices in keeping with the values that characterize it.

As part of this culture of compliance, the Company has a Compliance Committee, appointed by the Governing Body of HIPERION HOTEL GROUP, S.L., in charge of guaranteeing, supervising and verifying compliance with legislation and internal regulations. In 2017, the said committee approved a model for the control and management of legal offences in order to prevent, detect and rectify possible risks of non-compliance with legislation or internal regulations and, in particular, legislation of a criminal nature. This Code plays a decisive role in the control model (also known as our Compliance Policy).

## 2. To whom does it apply?

To all workers<sup>1</sup> (and, in particular, to the Management of HIPERION), whatever form of contractual relationship they may have, and to members of HIPERION's Governing Body and its partners. Suppliers and sub-contractors are expected to apply equivalent standards.

It is the responsibility of each one of us to be familiar with and to comply with this Code. Failure to do so might lead to the application of the disciplinary system.

## 3. Our values



### Our family

- Trustworthy. We do our very best at all times to contribute to the happiness of our guests during their stay.
- Dedication. We put all our effort and dedication into everything we do.
- Loyalty. Loyalty is all important in relations with our guests and with our family.



### Efficiency

- Efficiency. We strive to ensure maximum quality at all times, with straightforward diligence and care.
- Seeking to excel. We regard each situation as a learning curve and an opportunity to excel.
- Responsibility. We maintain a sense of duty, complying with our obligations and accepting responsibility for the consequences.

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<sup>1</sup> Staff hired directly by the hotel



### Service

- Consideration. We give priority to courtesy and customer care.
- Inclusiveness. We respect, understand, value, and accept absolutely everyone.
- Understanding. We always show empathy, honesty and gratitude.



### Keen dedication

- Seeking to excel. We strive to make ongoing improvements.
- Passion. Everything we do is done with passion, enthusiasm and gratitude.
- Unflappable. We are cheerful, calm and composed.

## 4. Principles of action and a responsible business approach

### a) Responsible, ethical practices

HIPERION's business ethics are based on a series of moral principles and codes of conduct relating to its business activities. They consist of the application of a series of general ethical principles, on the one hand, and the everyday exercise of a set of specific values in our market activities. Hence, our responsible practices are based on:

- A social commitment, in our awareness of their global impact and in a bid to contribute positively to society.
- A fair, safe, healthy, inclusive working environment, ensuring equal opportunities and no undue or discriminatory treatment.
- Customer relations founded on trust, honesty and straightforwardness, providing services that seek to offer top-quality solutions.
- Loyal, transparent conduct in market operations.
- Transparent, objective information for shareholders.

### b) Third-party relations (customers, suppliers, collaborators etc.)

- No acceptance of any kind of bribe, fraudulent behaviour or reward.
- Observance of legislation governing data protection, privacy and intellectual property rights.
- An attitude of respect and transparency, and the avoidance of any disputes with third parties.
- Fair competition.

### c) Compliance with the law

- Observance of national and international legislation, particularly in the field of finance and tourism.
- Compliance with internal regulations and ethical criteria.
- A firm response to any kind of non-compliance with the rules herein and, in particular, to any kind of discrimination.
- The establishment of control mechanisms to guarantee a respect for compliance with legislation.

### d) Respect for human rights

A respect for human and labour rights, expressly prohibiting any kind of child labour, employment exploitation, and forced labour.

### e) Condiciones laborales

At HIPERION, we promote a healthy working atmosphere, focused on career development, equal treatment and equal opportunities, with no violent or discriminatory conduct and the observance of labour legislation (including legislation governing health and safety at work)

### e) Environmental care

- Cumplir con la normativa nacional e internacional en materia de medioambiente.
- Integración del respeto al medioambiente en todas las áreas de negocio.
- Velar por el menor impacto y la mayor sostenibilidad.

## 5. Compliance obligations and the consequences of their infringement

Through the application of this **CODE OF ETHICS**, our values can be put into practice. That is why HIPERION strives to ensure that the Code is complied with, disseminating it and making its contents known to the people at whom it is addressed, while also taking all necessary steps to guarantee compliance with it.

Each of the people at whom this Code is addressed must be aware of their responsibility, and they must hence behave in accordance with the ethical principles promoted by the Company and contained in this Code. They must strive to ensure transparency and integrity in all relations, in particular with customers, suppliers and other members of staff.

If any non-compliance (or suspected non-compliance) with legislation, HIPERION's internal regulations and, in particular, this Code of Conduct and Ethics is detected, it must be disclosed through the [Whistleblowing Channel](#). In the event of a non-compliance, the Company may use the corresponding mechanism to sanction those members of staff who infringe the Compliance Programme that has been set in place and/or any particular legislation.

## 6. Modificación del Código

The Company undertakes to revise this document on a regular basis. For this purpose, it will check the legislation in force and take into account any suggestions made by customers, consultants, suppliers etc.

This regulation was approved at a meeting of HIPERION's Board of Directors, held on 21st of June 2023, and at a meeting of the Compliance Committee, held on 1st of June 2023.

## **7. Publication and dissemination of the Code**

The Code of Conduct and Ethics shall be made known to Company staff, and it shall also be published on the corporate website as a reference for all third parties with links with the Company and to foster a culture of compliance with legislation.

For this purpose, Management shall carry out any training initiatives that are deemed necessary.

**We count on your support and collaboration in the fulfilment and dissemination of the values, conducts and rules of this Code**

