

ETHICAL CODE OF CONDUCT

OHTELS HOTELS & RESORTS



ENGLISH

Brief description:

In this document you will find all the necessary information regarding the code of ethics of Inver&Gest, S.L.

Complaint email:

compliance@ohtels.es

LETTER FROM THE MANAGEMENT OF “INVER & GEST, S.L.”

Since its beginnings, “INVER & GEST, S.L.” has pursued a single goal: to professionalize hotel management. Our commitment has always been to achieve maximum satisfaction by offering professional services in administration, accounting, human resources, marketing, procurement management, and legal consulting.

Our professionalism, honesty, and transparency have earned us the trust of major companies, helping us turn our projects into reality.

This has been possible thanks to the professionalism and hard work of everyone on the team at “INVER & GEST, S.L.”, who, day after day, help ensure that our “OHTELS” brand is now synonymous with excellence, professionalism, commitment, honesty, trust, and transparency.

Our firm commitment to improvement and growth, together with our dedication to upholding and defending our values, has led us to adopt this Code of Ethics for “INVER & GEST, S.L.” which shall govern the conduct that of everyone who is part of the company—employees, executives, administrators, and collaborators—as well as that of all individuals with whom we have labor, professional, commercial, or civil relationships, whether they are natural or legal persons.

It is important that we all commit to upholding and adhering to the values on which the Code of Ethics is based, as well as our willingness to comply with them and align our conduct accordingly. ohtels.es

I thank you for your trust and honesty; without you, this goal would have been impossible, and each of you helps ensure that every project and every dream becomes a reality.

INTRODUCTION

This Code, together with established work policies and procedures, serves as our guide to appropriate conduct to ensure that no criminal offenses occur within the company.

This Code serves as a guide for all employees and managers of “INVER & GEST, S.L.” in the performance of their professional duties, covering their daily work, the resources they use, and the business environment in which they operate. This Code provides guidelines that clarify the basic principles of all management practices and interpersonal relationships with colleagues, collaborators, supervisors, suppliers, customers, shareholders, and, in general, any person with a direct or indirect interest in the activities carried out by “INVER & GEST, S.L.” Our actions are based on respect for our corporate values, and employees will align their conduct with principles of behavior that uphold business ethics and professionalism, with the goal of making “INVER & GEST, S.L.” a benchmark in these areas and ensuring it is recognized as such.

SCOPE OF APPLICATION

This Code, which will be available for review on the website <http://www.ohtels.es>, applies to all employees of “INVER & GEST, S.L.”, regardless of the type of employment contract governing their employment relationship, the position they hold, or the location where they perform their work.

VALUES

Our values define who we are as a team. We stand out because the people who work at “INVER & GEST, S.L.” make this company a unique and distinctive enterprise. We are responsive, we listen carefully, we strive for innovation, we are dedicated to serving others, and we work together as a team with rigor and transparency.

- **EXCITEMENT** Have enthusiasm and nurture it. Enthusiasm helps us achieve our goals. Enthusiasm is a vision for the future that helps us make it a reality. At “INVER & GEST, S.L.” we act quickly and dynamically, focusing efficiently on solving problems by proposing realistic, high-quality, and viable alternatives.

We listen carefully to our internal and external clients to fully understand their needs and propose appropriate solutions.

We keep the client's perspective in mind in every operation we undertake.

- **ACCOUNTABILITY** We listen actively, with an open mind and respect for the opinions of all parties involved in a situation.

At "INVER & GEST, S.L.," we understand our clients' needs and expectations so that we can develop and implement solutions that enhance their satisfaction.

- **INNOVATION** Innovation for everyone. Turning new ideas into value and knowing how to bring them to market. Innovation is the successful commercialization of an idea.

At "INVER & GEST, S.L.," we adapt quickly to changes and demands in the professional environment.

We actively seek opportunities to improve our products and services and create new business opportunities.

We leverage opportunities and challenges to provide innovative solutions. ohtels.es We constantly update our knowledge to become pioneers in innovation.

- **COHERENCE** We act in accordance with our ideas, our aspirations, and our plans. The hallmark of a leading company is the consistency between its ideas and its actions

- **HONESTY, TRANSPARENCY, and TRUST.** The company's hallmark. Honesty and transparency help us earn trust through audits that verify our honest and transparent work, and others recognize this and trust our work.

At "INVER & GEST, S.L.," we serve our clients efficiently, always maintaining a responsive and decisive approach that enhances the credibility and reputation of the company and its professionals.

We respect differences, opinions, and diversity. We are committed to environmental stewardship and sustainability policies.

PRINCIPLES OF ETHICAL CONDUCT

The ethical standards that govern “INVER & GEST, S.L.” are based primarily on:

GOOD FAITH

At “INVER & GEST, S.L.,” we conduct ourselves in accordance with the principles of loyalty and good faith toward the company, our supervisors, colleagues, suppliers, and customers.

We maintain a constant and ongoing commitment to achieving our goals, fostering an optimistic attitude, and prioritizing the overall objectives of “INVER & GEST, S.L.” over our personal goals.

We ensure that there is no conflict between our personal interests and those of “INVER & GEST, S.L.,” and in any case, the company’s interests will take precedence.

HONESTY

At “INVER & GEST, S.L.,” we are committed to disclosing any personal or professional relationships that could influence our conduct as employees of the company.

As employees of “INVER & GEST, S.L.,” we do not accept improper compensation or benefits, nor do we offer gifts or promise undue favorable treatment to third parties in order to gain an advantage. At “INVER & GEST, S.L.,” we will avoid conduct that is contrary to free competition or that constitutes an act of unfair competition. In advertising campaigns, we provide information in a clear and truthful manner.

RESPECT

Each and every one of us is responsible for fostering a friendly and welcoming atmosphere in our workplace, promoting respect and trust among colleagues.

At "INVER & GEST, S.L.," we respect diversity of opinion and culture as a source of knowledge and a competitive advantage; defamatory comments are strictly prohibited both within and outside the company.

The management of "INVER & GEST, S.L." will promote respect for equal opportunities between men and women, preventing any form of discrimination.

At "INVER & GEST, S.L.," no employee shall be discriminated against on the basis of race, physical disability, religion, age, nationality, sexual orientation, gender, political opinion, or social origin, and we do not tolerate any form of physical, sexual, psychological, or verbal harassment or abuse.

At "INVER & GEST, S.L.," we respect the environment and contribute to the sustainable development of society.

CONFIDENTIALITY

At "INVER & GEST, S.L.," we will not disclose confidential information about individuals and/or the activities carried out within the company.

At "INVER & GEST, S.L.," we will avoid conduct that violates fair competition or constitutes an act of unfair competition. In advertising campaigns, we present information in a clear and truthful manner.

At "INVER & GEST, S.L.," we will comply with personal data protection regulations regarding the information to which we have access due to our job positions. The information is the property of the company, and in our conduct:

- We will provide managers with accurate, necessary, complete, and timely information regarding the progress of activities in our department; and we will provide our colleagues with the information they need to perform their duties effectively.
- We will maintain professional confidentiality regarding the data, reports, accounts, balance sheets, strategic plans, and other activities of "INVER & GEST, S.L." and its personnel, the disclosure of which could harm the company's

interests. We will not disclose any information regarding these matters unless we are expressly authorized to do so.

- We will obtain information from third parties in an ethical and lawful manner, rejecting any information obtained improperly or that constitutes a breach of trade secrets or confidentiality.

En el supuesto de tener dudas acerca del tratamiento adecuado de la información, solicitamos la valoración de nuestro responsable acerca de la correcta catalogación de esta.

- We may not use the software, computer systems, manuals, videos, courses, studies, reports, etc., created, developed, or improved by "INVER & GEST, S.L." for our own purposes, for the purposes of third parties, or for profit, as the company retains intellectual property rights to these at all times.
- We will use only those computer systems, software, etc., for which "INVER & GEST, S.L." has obtained the appropriate license, and we will respect their intellectual and industrial property rights at all times.
- The use of computer equipment is subject to the information security policy of "INVER & GEST, S.L.", with the aim of preventing harm to third parties and/or the company itself.
- We will not use our access to the systems to engage in fraudulent activity or for personal gain.

PRINCIPLES OF PROFESSIONAL CONDUCT

Passion for the customer

All employees at INVER & GEST, S.L. strive to offer our clients the highest quality service and an excellent level of customer care. Excellence and quality of service are constant guiding principles in our work, and we are committed to customer satisfaction.

Efficient management

The employees of "INVER & GEST, S.L." work efficiently during the working day, making the most of the time and resources that the company makes available to us in a rigorous and rational manner, and we will not participate in personal activities during

working hours that interfere with or prevent us from fulfilling our work responsibilities. At INVER & GEST, S.L., we will work to achieve results in the most optimal and productive way possible. The company will provide us with all the necessary resources to perform our work and improve performance by optimizing time and access to the information needed to fulfill our responsibilities. At INVER & GEST, S.L., we will use company email and internet access exclusively for work purposes. Their use for personal purposes is expressly prohibited, and we expressly authorize INVER & GEST, S.L. to monitor their use.

Unacceptable use of INVER & GEST, S.L.'s communication systems includes processing, sending, retrieving, accessing, viewing, storing, printing, or otherwise disseminating materials and information that are fraudulent, harassing, threatening, illegal, racist, sexist, obscene, intimidating, defamatory, or otherwise inconsistent with professional conduct.

Team attitude

The employees of "INVER & GEST, S.L." will promote teamwork and recognize the contributions of others in achieving common results.

A team-oriented attitude prevails and takes precedence over any individual action, avoiding passive behavior.

At "INVER & GEST, S.L.", we will work in a spirit of cooperation, making available to other areas of the company the knowledge and resources that facilitate the achievement of "INVER & GEST, S.L."s objectives.

Protecting reputation

We consider the image and reputation of "INVER & GEST, S.L." to be one of its most valuable assets for maintaining the trust of our clients.

The brand image is visually represented by our "INVER & GEST, S.L." logo, for which there are usage guidelines that protect its use and which we must respect.

At "INVER & GEST, S.L.", we are all part of the corporate image and therefore assume ethical and responsible conduct that allows us to preserve the company's image and reputation. We will never engage in behavior that could damage the image.

Our communication style, conduct, and personal appearance will be consistent with the professional context in which we operate.

Professional development

Our professional growth and that of our teams is key to our competitiveness. We, as employees, are responsible for our own professional development, and therefore it is our duty to stay constantly updated with the knowledge and techniques necessary for the efficient performance of our work.

PRINCIPLES OF LEGAL CONDUCT

Our responsibility in the face of child prostitution and corruption

"INVER & GEST, S.L." will take measures to prevent the use of its hotel operations for prostitution or the promotion of prostitution. "INVER & GEST, S.L." strongly rejects any form of inducement, promotion, facilitation, or encouragement of child prostitution and, to this end, will take all possible measures and precautions to prevent such conduct in the event of any suspicion that minors are being used for prostitution or exhibitionism.

Our responsibility regarding data protection

INVER & GEST, S.L. will ensure the protection of personal data stored or exchanged during its daily operations. INVER & GEST, S.L. will comply with data protection legislation when processing personal data of clients, suppliers, shareholders, employees, or other third parties.

Our responsibility regarding intellectual and industrial property

"INVER & GESR, S.L." will actively ensure the proper use and protection of its intellectual and industrial property rights. This includes the intellectual property rights of any

program or process, whether computer-based or not, developed using resources belonging to “INVER & GESR, S.L.”

Our responsibility in the face of public and private corruption

“INVER & GEST, S.L.” rejects all forms of corruption, in both the private and public sectors.

Employees and shareholders of “INVER & GEST, S.L.” will not receive, solicit, or accept, in the course of their professional duties, any unjustified benefit or advantage of any kind for themselves or for “INVER & GEST, S.L.” They will refrain from accepting gifts or tokens of hospitality from clients, suppliers, shareholders, or third parties in general, with a value exceeding €200 per gift or token of hospitality.

Gifts or tokens of hospitality, even if valued at less than €200, will not be accepted when the context or circumstances in which they are promised, offered, or delivered give rise to reasonable suspicion that they are intended to induce any improper action or omission, or as remuneration for one already committed.

Similarly, the employees and shareholders of “INVER & GEST, S.L.” shall:

Refrain, in the context of their professional or business activities, from promising, offering, or giving gifts or tokens of hospitality to clients, suppliers, or third parties in general.

The employees and shareholders of “INVER & GEST, S.L.” shall not offer, promise, or grant any undue benefit or advantage to corrupt or attempt to corrupt, directly or indirectly, any public authority or official for the benefit of “INVER & GEST, S.L.” in order to obtain any competitive advantage.

Any action, conduct, behavior or practice constituting bribery or influence peddling in the relations of “INVER & GEST, S.L.” or for the workers, shareholders... of the company is strictly and completely prohibited.

Our responsibility regarding money laundering

The employees of "INVER & GEST, S.L." will pay particular attention to cash payments and receipts that appear unusual given the nature of the transaction, as well as those made by bearer checks, reporting any irregularities to their superiors.

All applicable regulations must be respected. Payments where the payer or payee is a third party not named in the corresponding contracts, and those made to accounts not typically used in dealings with a particular company, will also be reported.

Our responsibility to comply with tax and social security obligations

Sustaining public spending and Social Security benefits is everyone's responsibility, and at INVER & GEST, S.L., we wish to publicly declare our commitment, assuming the obligation to contribute to the Public Treasury. The accounting records of INVER & GEST, S.L., and the filing of its annual accounts, will always be maintained in strict compliance with applicable commercial legislation, avoiding any type of falsification, omission, simulation, or irregularity. Likewise, all legal obligations relating to the preservation of the company's commercial and accounting documentation will be meticulously observed. The employees and professionals involved in the preparation, processing, and management of INVER & GEST, S.L.'s tax returns will avoid committing any type of omission, falsification, or irregularity that could lead to fraud against the Public Treasury or the European Union. Similarly, all employees and professionals involved in the management of payroll and social security at "INVER & GEST, S.L.," must prevent any type of irregularity that could lead to fraud against Social Security.