



SUSTAINABILITY REPORT AND NON-FINANCIAL INFORMATION STATEMENT 2022



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1.1

APPROACH TO THE *SUSTAINABILITY* REPORT AND STATEMENT OF NON-FINANCIAL INFORMATION

THE IMPORTANCE OF SUSTAINABILITY REPORTING.

For yet another year, Tecamira Group, S.L. and Subsidiary companies, commercially known as Grupo Vincci Hotels (hereinafter "Group", "Company", "Vincci" or "Vincci Hotels") publishes its Sustainability Report and Statement of Non-Financial Information (hereinafter "Report" or "NFI"), which reaches its eleventh edition with this 2022 report. The ultimate aim of this Sustainability Report, in addition to providing information on the Company's different initiatives, is to highlight our solid commitment to responsibility in the areas of social, environmental and economic interest.

Over the last few years we have taken a series of measures and been involved in different initiatives which, together with those developed in the last financial year, have made Vincci Hotels a benchmark in sustainability and social responsibility. Our good work and the exercise of responsibility acquired with the different stakeholders consolidate us as a leading chain in the responsibilities that we carry out.

ABOUT THIS REPORT.

The information described throughout this Sustainability Report includes the Group's owned, leased and managed hotels.

However, to strictly comply with the requirements of Law 11/2018 of the EINF (non-financial reporting), the exclusive data of the Group's accounting consolidation perimeter has been specified in certain information throughout this Report, indicating them as "Group Perimeter" which are subject to verification by the independent third party expert.

The 2022 Sustainability Report presents both the commitments we have made and the challenges that lie ahead. We are on the way to taking the additional steps demanded by those who trust in our good work as a consolidated and growing structure.

By reading this Sustainability Report, interested parties can learn more about who we are, our present and our future. As a goal, we will continue to be committed to transparency, always bearing in mind that honesty turns our services into a tourism product that is firmly committed, as well as profitable and efficient.

With these goals we have managed to make the "Vincci Hotels Sustainable & Responsible" web site ("Vincci Hoteles Sostenibles & Responsibles" web site) a two-way communication channel that manages to transmit the social and environmental practices of our company, highlighting the challenges we take on each year in terms of corporate social and environmental responsibility.

As part of a policy of transparency and honesty, and with the aim of constant communication with our interlocutors, Vincci Hotels has a sustainability microsite that is a true reflection of the enthusiasm with which the whole team tackles the social and environmental challenges it faces. This is a common objective of all the members of our chain that has been achieved thanks to the efforts of the professionals who, in the different departments, work to improve the experience of our guests. They are the real protagonists of our activity and the continuous efforts to improve day after day.

The activity of Vincci Hotels has an impact on its surroundings, but it is in our hands to act under firm commitments to sustainability and respect for the communities that host our hotels. Protecting our employees and participating in sustainable

01 ABOUT THIS REPORT

projects that are committed to society, with the aim of full community development, is the best version of ourselves and the way to give back to society everything it offers us. For this reason, the social collaborations we make with different institutions and organisations, and the help we give to the groups that need it most, make us feel especially proud.

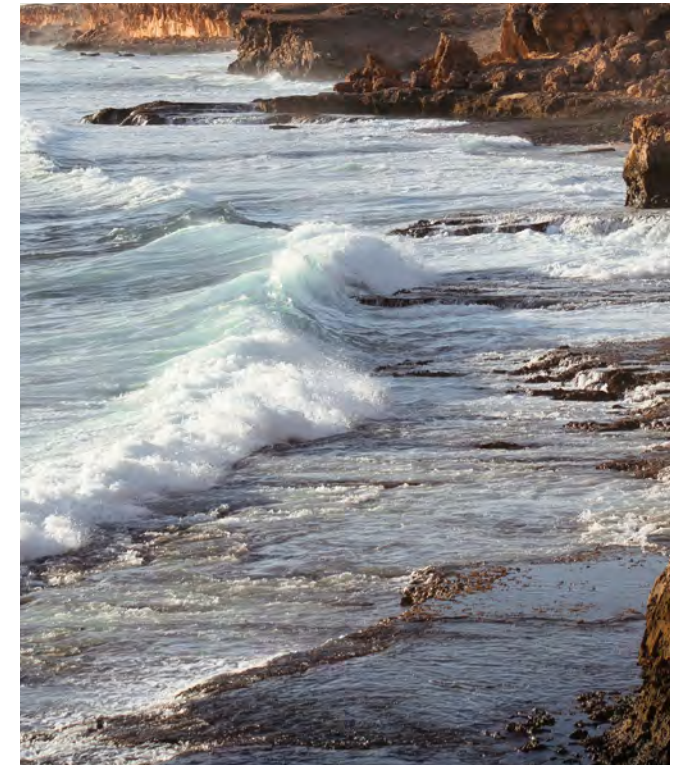
Regarding the environmental interest related to our activity, we would like to highlight the implementation of the Environmental Management System in accordance with the international standard ISO 14001:2015, which allows us to face the most effective measures related to environmental protection and pollution prevention, which contributes to the preservation of the planet in the best conditions for the generations to come.

Similarly, the external certification of our Environmental Management System helps us to improve all implemented preventive and corrective measures, and to implement control bodies to try to detect and remedy errors even before they appear.

The information identified in Annex I - "Applied contents of Law 11/2018" included in this Sustainability Report is verified by Deloitte, S.L.

The Sustainability Report 2022 can be downloaded free of charge at the following website:

↓ <http://sostenibilidad.vinccihoteles.com>



MESSAGE FROM THE MANAGEMENT.

"At Vincci Hotels we are once again presenting our annual sustainability report, true to our firm commitment to caring for our environment and to a model of sustainable tourism. A trend that we at Vincci Hotels have always been committed to from day one, as part of our philosophy and our values. Since our creation as a hotel chain we have worked to build a sustainable business model, with initiatives that minimise our footprint both in our hotels and in the destinations where they are located, and always collaborating with social organisations in each community.

During this period, we have made progress in the various plans we have implemented, which cover different environmental and social aspects, with challenges and objectives up to 2030. This is the case of the CSR Plan, the Ecological Transition Plan, the Carbon Footprint Reduction Plan, the Sustainable Water Management Plan, the Waste Management and Reduction Plan, and the Healthy and Sustainable F&B Plan. All of them analyse the situation in which we find ourselves both at chain level and in each of the establishments and mark a strategy of continuity in this path undertaken since our origins, proposing new challenges and updating facilities and methods in line with new technologies and developments in the sector.

All these measures have enabled us to achieve new sustainability milestones in 2022, for example, we have reduced our water footprint by 11% thanks

to the measures implemented in the Sustainable Water Management Plan.

In this sense, it is also worth highlighting the extension of our collaboration with Endesa, after years of joint work multiple measures focused on the reduction of CO₂ emissions and the use of 100% green energy in our hotels have implemented. The initiative is a further step in our firm commitment to reduce the effect that our activity has on the ecosystem.

Thanks to all this, we have once again been awarded various recognitions such as the Ecostars Sustainability Certificate in our establishments in Spain, Portugal and Tunisia, obtaining some of the highest ratings in Europe. This seal of sustainability is in addition to the recognitions we already have both at a global level and in each one of our establishments. In the last year Vincci Mae 4, Vincci Selection La Plantación del Sur 5* and Vincci Tenerife Golf 4* have also obtained the Biosphere certification, a recognition whose objective is to promote the development of the tourism industry in a sustainable way while at the same time promoting the social and cultural authenticity of each destination and community. The Biosphere methodology translates the 17 Sustainable Development Goals of the United Nations 2030 Agenda into tourism. In addition, we have joined UNESCO's Sustainable Travel Commitment, a commitment that aims to promote sustainable travel, community resilience and heritage conservation globally.*

In short, we are a chain involved in the sustainable development of our company, as well as in the sustainable development of the destinations and environments where we are located. That is why we are transparent in our performance and committed at all levels to a more sustainable tourism. As always, during this year all the professionals who form part of this chain have given their best to offer an authentic Vincci experience to our clients, the basis of our business. Thanks to their efforts and hard work, at Vincci Hotels we are able to maintain all our present commitments and continue to set new challenges for the future".

Carlos Calero
CEO



1.2

SUSTAINABILITY STANDARDS

GRI STANDARDS.

The preparation of this Sustainability Report under GRI standards reflects the Company's interest in providing a complete and balanced picture of the main aspects of interest, as well as the related impacts and their management.

This Sustainability Report has been prepared in accordance with the GRI standards in their Essential option (See Annex I - Applied contents of Law 11/2018 EINF (non-financial reporting)).

LINK WITH THE SUSTAINABLE DEVELOPMENT GOALS.

It is well known that tourism is a source of wealth for the environment where the activity takes place. In this sense, our priority objective is to contribute to progress in a global way, with respect for the environment and, of course, for the local population and its cultural heritage.

In 2015, the United Nations (UN) approved the 2030 Agenda for Sustainable Development, which includes different objectives, including eliminating poverty and protecting the planet for future

generations through actions related to women's equality, education, the design of new cities and environmental care. In order to achieve the 17 goals set, different actions were established as part of a sustainable development agenda aimed at improving humanitarian conditions and, through an international commitment, achieving a better world for all humanity.

This Sustainability Report 2022 is the result of Vincci Hotels' efforts to include its activities in the Sustainable Development Goals set for 2030 by the UN. Not only do we try to improve people's lives, but we also try to create a fairer and more environmentally friendly society, with a solid commitment to respect the environment.

This is the common goal that all our employees and suppliers want to transmit to our customers. A capacity to make an effort to be aware of the impact that our activity and our decisions generate in the places where we are based, which is perfectly combined with the intention of adjusting to the global needs of our society.

Special sensitivity when it comes to supporting the most disadvantaged social groups is immersed in

the Company's DNA. A philosophy that is reflected in the attitude of collaboration with different institutions and organisations that fight every day to solve the problems of our society and help the most disadvantaged.

Green employment, managed by associations, organisations and foundations oriented to this end, is one of the options that offer job opportunities to people belonging to groups at risk of exclusion. Our hotels, scattered in different locations, offer society the possibility of meeting different needs, depending on each location.

We are particularly proud of our efforts in waste recycling and surplus management, in the belief that they are an excellent way of protecting the environment. It is one of the many initiatives that confirm our effective and responsible commitment to respect the environment, and which in turn form part of a global action of social support that allows us to meet some of the most pressing needs of our Company.

1.3

BUSINESS ANALYSIS

STAKEHOLDERS.

At Vincci Hotels we believe that we can create sustainable development through dialogue and joint efforts with suppliers and subcontractors, the Administration, clients, employees, competitors, shareholders, trade unions, hotel properties, NGOs and all social agents.

We are convinced that environmental projects can move forward if people fight for them, joining forces even in such a competitive environment as the tourism sector. However, we must all strive to achieve the cohesion necessary to meet the demands of the society. There is still a long way to go, but we have already started to take the first steps by detecting social needs and the expectations placed on our common effort. Our commitment is to anticipate problems in order to achieve a society committed to the common good.

Our plans are to continue working on this ongoing effort that allows us to provide a highly effective response to the demands of our stakeholders while remaining faithful to the business philosophy that saw us born. It is a unique opportunity to maintain

our social commitment and set the path to follow when it comes to achieving dialogue in a climate of trust, an alignment of expectations and limitations, continuous improvement and the projection of common benefits, and the establishment of synergies and objectives through experience.

CUSTOMERS

All of Vincci Hotels' efforts are directed towards our customers, who are what give meaning to our organisation. Every day we try to offer them a service of excellence and a unique accommodation experience that exceeds their expectations. Our experience and the vocation for service that characterises us are geared towards their complete satisfaction.

EMPLOYEES

Our business is sustainable and it is widely consolidated thanks to the efforts of a team of people fully aligned with the Company's objectives, who are constantly involved in their work. We are committed to improving the working situation and the environment in which our professionals carry out their daily activities, while offering them the

possibility of continuous training throughout their professional lives and a work-life balance. In 2019 we will join the Healthy Companies Network.

It was launched in Spain in 2013 with the "Healthy Companies" project, inspired by the work carried out by the European Network for Workplace Health Promotion (ENWHP) and in response to the own interest of the National Institute for Safety and Health at Work (in Spain INSST) in recognising the work of companies in the field of improving the health and well-being of their workers, as well as promoting a culture of health and the exchange of business experiences.

PUBLIC ADMINISTRATION

The sum of our efforts is the solution to many of the environmental and social problems that we, as a society, have to face. This is the reason why we invite the Public Administration to a constant dialogue that allows us to collaborate in order to achieve sustainable development and a planet that will be maintained in the best conditions for future generations.

SUPPLIERS AND SUBCONTRACTORS

Our relationships with our partners and suppliers are based on trust, honesty and transparency. We share with them a single set of values and a common vision of the business. Our mutual benefit has been transformed into a well-established relationship, with common synergies that allow us to continue to grow year after year.

SHAREHOLDERS

The fulfilment of the objectives we have set ourselves is possible thanks to mutual understanding and dialogue. In this way, we achieve optimum profitability and meet the challenges we have set ourselves throughout our history.

SOCIETY

Contributing to the progress of the social environment in which our hotels are located is one of our greatest challenges. For this reason we collaborate with different initiatives that seek local development, the progress of the environment and the respect for it.

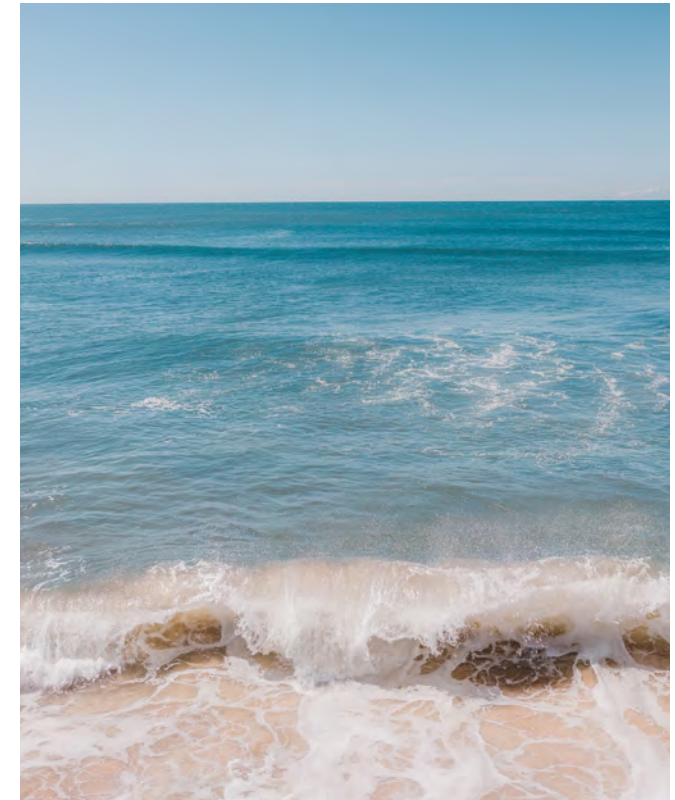
TRADE UNIONS

Our commitment is to offer our clients a unique and differentiated accommodation experience. This objective of Vincci Hotels would not be possible without the effort, involvement and daily work of our team of professionals. Likewise, our joint efforts with the trade unions, as agents of socialisation in terms of protecting the rights and integrity of our workers, have resulted in a committed team of people who take advantage of the opportunities that the organisation offers them and enjoy fulfilling their duties.

COMPETITORS

Fair competition is not only necessary for the hotel sector to perform well, but also healthy when it comes to seeking joint solutions and offering a boost to the sector, resolving all those issues that contribute to slowing it down and hindering it.

The following tables show for each stakeholder group which communication channels are available from Vincci Hotels, and how often they are used.



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Stakeholder Priority 1: Internal

SHAREHOLDERS				EMPLOYEES				TRADE UNIONS			
Commitments	Communication		Frequency	Commitments	Communication		Frequency	Commitments	Communication		Frequency
	Channel	Responsible			Channel	Responsible			Channel	Responsible	
Transparency	Sustainability Web	Marketing Dept.	Periodical	Sustainable management	Internal communications	Quality and Sustainability Dept.	Periodical	Prevention of Occupational Risks	Internal communications	HR Dept.	Recurrent
Sustainable management				Development opportunities	Vincci&Go	HR Dept.	Recurrent	Legal compliance			
Good governance				Equality and security	Intranet		Recurrent	Equality			
Composition	Dialogue		Frequency	Composition	Dialogue		Frequency	Composition	Dialogue		Frequency
	Spaces	Responsible			Spaces	Responsible			Spaces	Responsible	
Owners	Governing Bodies	Steering Committee	Periodical	Employees	Meetings with teams	Directors and Managers	Recurrent	Trade union associations	Trade union meetings	Elected unions in hotels	Periodical
Minority Shareholders					Equality Commission	HR Dept.	Periodical	Equality Commission	HR Dept.		
Measurement	Dashboard			Measurement	Climate survey	Quality training		Measurement	Wage Gap	Accidents at work	

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Stakeholder Priority 2: Environment

CUSTOMERS				SUPPLIERS AND SUBCONTRACTORS			
Commitments	Communication		Frequency	Commitments	Communication		Frequency
	Channel	Responsible			Channel	Responsible	
Personalised experience	Corporate website	Marketing Dept.	Recurrent	Long-term relationships	Direct communications	Operations Dept.	Recurrent
Service excellence	App		Recurrent				
Sustainable management	Web sustainability		Periodical	Trust and respect		Operations Dept.	Recurrent
Health and safety			Periodical				
Composition	Dialogue		Frequency	Composition	Dialogue		Frequency
	Spaces	Responsible			Spaces	Responsible	
B2C (individual)	Surveys	Quality and Sustainability Dept.	Periodical	Product suppliers	Direct meetings	Operations Dept.	Recurrent
B2B (corporate)		Commercial Dept. or Hotel Groups	Recurrent				
Travel agencies	Workshops	Commercial & Revenue Dept.	Sporadic	Service providers	On-site visits	Operations Dept.	Sporadic
Intermediaries, OTAs and TTOOs	Direct communications		Sporadic				
Measurement	GRI Reviewpro	NPS Reviewpro	Reviewpro Surveys	Measurement	There is none		

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Stakeholder Priority 3: Context

PUBLIC ADMINISTRATION				SOCIETY				COMPETITION			
Commitments	Communication		Frequency	Commitments	Communication		Frequency	Commitments	Communication		Frequency
	Channel	Responsible			Channel	Responsible			Channel	Responsible	
Transparency and honesty	Sustainability Web	Marketing Dept.	Periodical	Sustainable management	Sustainability Web	Marketing Dept.	Periodical	Ethical competence	Sustainability Web	Marketing Dept.	Periodical
Collaboration	Direct to hotels or head office	Directors and Managers	Recurrent	Social interest				Collaboration	Direct to hotels or head office	Directors and Managers	Recurrent
General interest	Management Secretary	CEO and Chief Operating Officers		Recurrent	Collaboration	Direct to hotels or head office	Directors and Managers	Recurrent	Transparency	Sustainability Web	Marketing Dept.
			General interest								
Composition	Dialogue		Frequency	Composition	Dialogue		Frequency	Composition	Dialogue		Frequency
	Spaces	Responsible			Spaces	Responsible			Spaces	Responsible	
European, national, regional or local administrations	Institutional relations	Affected Dept. Affected	Recurrent	Academic and educational environment	Meetings and direct communication	Affected Dept.	Recurrent	Regulatory bodies	Institutional relations	Affected Dept.	Recurrent
				Neighbourhood associations				Competitors			
Public entities	Events, meetings and forums			Public-private bodies				Social entities and NGOs			
Public-private bodies	Direct communications	Society at large									
Measurement	There is none		Measurement	There is none		Measurement	There is none				

1.4

MATERIALITY ANALYSIS

The process of identifying the priorities for action, or material aspects, has been carried out taking into account the concept of double materiality that is, identifying both the impacts, risks and opportunities that the activity of Vincci Hotels may have on society and the challenges that the social reality imposes on the company's business model. To this end, we have analysed and taken into account the different inputs mentioned above: economic, social, environmental and social.

Responsible and optimised consumption of resources is not only necessary in terms of savings, but also when it comes to reducing the environmental impact associated with our activity. The mission of the Works and Maintenance Department is to analyse the needs of each establishment in order to offer customised solutions, pointing out the measures that need to be adopted and the investment involved.

In order to offer concrete solutions, we must identify the needs of our stakeholders. In this sense, the Sustainability Report 2022 includes all the relevant information on environmental, economic and social matters, thus opening a direct communication channel aimed at the common interest.

Materiality analysis allows Vincci Hotels to identify requirements, expectations and other aspects

specified by stakeholders, with the aim of analysing them and implementing planned initiatives to ensure the proper development of processes. This requires two-way communication that is not only of interest to our Group, but also allows us to evaluate the importance of certain issues when considering their implementation in different business models. The materiality analysis allows us to find out which aspects to communicate in the Sustainability Report are of interest to the parties involved.

The methodology used to meet these objectives begins with the identification of aspects of interest worthy of inclusion in the Report, which includes a review of the main trends in the sector and the recommendations and expectations of stakeholders, as well as a prior contact with public opinion reflected in social networks and the media.

After observing the opinions and recommendations made by key stakeholders for Vincci Hotels, the most important issues are selected, prioritising the most relevant ones. In order to apply the principle of materiality, it is essential to assess the influence of each issue on stakeholder decisions, while measuring the importance of the economic, environmental and social impacts. This is why this step includes an analysis of the main challenges and the most important trends for the sector, the internal opinion of the main business areas, the

best practices of leading companies and the Group's current performance.

The next step is the review, assessment and validation of the issues by the different business units and senior management. Thus, from the application of the principles of completeness and stakeholder participation, we move on to the identification of content. Finally, once the Sustainability Report has been published, a final review is essential while the Group prepares the next report.

As far as Vincci Hotels is concerned, the identification of the key aspects that the Company manages with its stakeholders has been carried out based on an analysis of good practices, trends, mentions in the media and their expectations. Likewise, the relevant points have been specified after maintaining a continuous communication channel open with the interested parties.

As mentioned above, the relevant topics of the Sustainability Report, after consultation with stakeholders, have been defined internally. After evaluating the various channels of communication with stakeholders, we have not been informed of any changes to the relevant topics.

Those that recur most frequently are considered key to the Memory.

Stakeholders	Communication Channel	Relevant Info
Shareholders	Continuous communication in the company	201, 202, 301, 302, 303, 305, 306, 307, 308, 401, 402, 403, 404, 405, 406, 407, 410, 416, 418, 419, 501, 502, 505
Employees	Continuous communication (work councils)	201, 202, 301, 302, 303, 306, 307, 401, 402, 403, 404, 405, 406, 407, 410, 411, 413, 416, 418, 419, 501, 502
Direct Clients	Online Questionnaires and Feedback	202, 301, 302, 303, 305, 306, 307, 405, 406, 410, 416, 418, 419, 501, 502
Public Administration	Hotel and Business Associations	201, 202, 205, 301, 302, 303, 305, 306, 307, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 416, 418, 419, 502, 503
Trade unions	Continuous ongoing communication (work councils)	201, 202, 205, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 419, 502
Suppliers and Subcontractors	Continuous communication in the company	201, 202, 301, 307, 308, 414, 419, 502
Society	Continuous communication in the company	205, 302, 303, 304, 305, 306, 307, 401, 405, 406, 412, 416, 419, 501
Competition	Continuous communication in the company	201, 202, 307, 401, 501, 502

Most relevant topics of the Sustainability Report 2022:

Economic

- 201 Economic performance
- 202 Market presence

Environmental

- 301 Materials
- 302 Energy
- 303 Water
- 305 Emissions
- 306 Waste
- 307 Environmental compliance

Social

- 401 Employment
- 405 Diversity and equal opportunities
- 406 Non-discrimination
- 410 Security practices
- 416 Client health and safety

Own

- 501 Customer satisfaction
- 502 Legal compliance

1.5

FUNDAMENTALS

HISTORY OF THE ORGANISATION.

Vincci Hotels is made up of a group of companies whose parent company is Tecamira, S.L., based in the Madrid town of Alcobendas. Throughout our history, the chain has consolidated its position in the tourism sector, supported by Rufino Calero, who ensured that the Group reflected his solid professional experience and the effort invested in consolidating Spain as a first-class tourist destination.

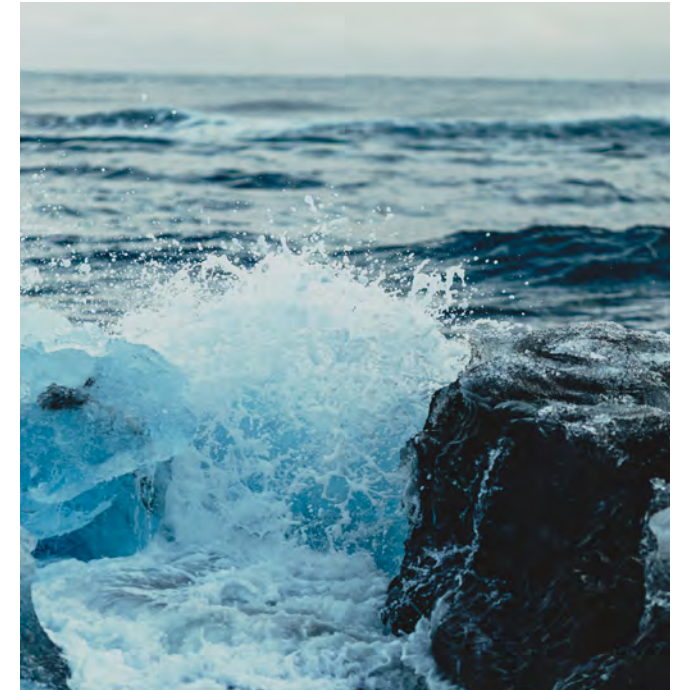
Vincci Hotels has become a benchmark hotel group in international tourism thanks to the efforts of his children and the interest of leading professionals in the sector. In 2001, Vincci Hotels began its professional career. Since then, and up to the present day, its ever-increasing trajectory has made it a Group of recognised prestige. The relentless pursuit of the highest standards of quality has not only become a distinctive element of the Company, but has also allowed it to satisfy the highest expectations of its clients year after year.

Today the chain has four and five star hotels, differentiated into two lines by Category and location, although all the establishments share and are

characterised by rigorous criteria of excellence, quality and innovation in hotel management.

As a hotel group we seek to build customer loyalty, offering them the best possible experience from the moment they approach us to make a reservation. Every single detail of our relationship is focused on achieving their complete satisfaction, which we achieve by offering them every luxury of comfort and personalised attention from our team of professionals.

The team that makes up Vincci Hotels is aligned with the Group's business philosophy and committed to offering the best service. The enthusiasm and willingness with which they attend to the clients is our main source of pride.



HOTEL OPENINGS PER YEAR

2001

- Vincci Hoteles is born
- Vincci Selection Rumaykiyya

2002

- Vincci Ciudad de Salamanca
- Vincci Puertochico

2003

- Vincci Costa Golf
- Vincci Djerba Resort
- Vincci La Rábida
- Vincci Lys
- Vincci Maritimo

2004

- Vincci Centrum

2005

- Vincci Selection La Plantación del Sur

2006

- Vincci Soho
- Vincci Tenerife Golf

2007

- Vincci Capitol
- Vincci Frontaura
- Vincci Palace
- Vincci Via 66

2008

- Vincci Baixa
- Vincci Nozha Beach
- Vincci Selection Estrella del Mar
- Vincci SoMa

2009

- Vincci Málaga

2010

- Vincci Selection Posada del Patio
- Vincci Helios Beach

2011

- Vincci Selection Aleysa Boutique & Spa

2012

- Vincci Albayzin
- Vincci BIT

2014

- Vincci Gala

2015

- Vincci Liberdade
- Vincci Mercat
- Vincci Porto
- Vincci Valdecañas Golf

2016

- Vincci Mae
- Vincci Marillia
- Vincci The Mint
- Vincci Zaragoza Zentro

2018

- Vincci Safira Palms
- Vincci Consulado de Bilbao

2019

- Vincci Rosa Beach Monastir

2021

- Vincci Ponte de Ferro

2022

- Vincci Larios Diez
- Vincci Molviedro
- Vincci Ever Eden Beach Resort
- Vincci Dar Midoun
- Hotel Ramblas powered by Vincci

MISSION, VISION AND VALUES.

Future projection

Our present is the best guarantee of a successful future. The daily work of our team is based on excellence and quality, and translates into the best experience for our customers. In this sense, we also feel firmly committed to the environment, with the confidence that comes from working to leave a better planet for future generations. We face this commitment with enthusiasm and courage, and with the backing of a business philosophy based on transparency, with a clear commitment to sustainability and the environment as a guarantee of success.

Joining forces

The professionals who make up Vincci Hotels have the common goal of becoming the best option for tourist establishments and a hotel benchmark in social and environmental issues.

Service innovation

Advanced computerised reservation systems and the most efficient technological management result in fully efficient management, in which the effort and professionalism of the human team is perfectly complemented by innovation to achieve the best results, in a zero-error policy that seeks the highest standards of quality and excellence.

Self-identity

In order to offer the highest quality, each of our hotels has a personal and unique identity, which in turn translates into personalised experiences for

our guests. Each establishment has its own distinct personality, marked by its location.

The Company's engine

The real heart of Vincci Hotels, and who makes the difference in our Group, is our staff, fully committed to the values that set us apart. A group of professionals whose constant effort and enthusiasm for doing things well allows us to achieve the quality and excellence that represents us. Their involvement, creativity and participation is what has allowed Vincci Hotels to stand out throughout its history, becoming a benchmark for the tourism sector.

Experience, training and innovation

Technological innovation is combined with the experience of our professionals, resulting in Vincci Hotels being able to meet each and every one of its challenges. Our experience allows us to offer our professionals continuous training throughout their working lives, so that they can develop their skills and abilities, in the conviction that only in this way will they be able to give the best of themselves to each client.

Our commitment

Our unconditional commitment to the environment and our interest in minimising the impact of our presence have been taken on board by both our employees and our suppliers, as reflected in the Environmental Management System that encompasses the Company's values. Our commitment to society involves supporting programmes and activities in favour of the most disadvantaged groups and those at risk of social exclusion, always

in the search for a society in which we all have the same opportunities and rights.

Heritage as a sign of identity

Our hotels are located in areas of high tourist, monumental, historical or scenic importance, which is a differentiating element of the Group. We rely on technology to offer the best service to our customers, but our values include respect for the environment as a hallmark of our establishments. Each of our accommodations has its own decoration and unique personality, but with quality as a common commitment.

Looking ahead

Every guest who chooses Vincci Hotels has a unique, unforgettable and unrepeatable experience, enjoying their stay to the full, with unbeatable service. An authentic Vincci Hotels experience that achieves complete satisfaction and builds loyalty for subsequent visits, and which is our company's best letter of introduction.

A consolidated organisation

Vincci Hotels is an established chain in the sector, both nationally and internationally. With the backing of this current recognition, we continue to move forward to ensure that the future is just as promising. Among the chain's objectives is its commitment to expansion, with the opening of new hotels, both in Spain and abroad.

We feel ready for the new challenges that lie ahead and we are determined to continue to demonstrate our transparency, our quality standards and the best service in each of the establishments of

our chain, whose list will soon be increased with new hotels located in privileged environments and thus achieve the complete satisfaction of our customers. Some of these challenges are:

Competition from accommodation rental platforms: For several years now an important factor has been the introduction of C2C platforms in the market, these platforms are and remain a direct competition to hoteliers. Gradually, in some territories, this form of rental has been regulated, resulting in the possibility to compete in a fairer way.

Changes in consumer preferences: Consumers need clarity, transparency, flexibility and choice to make decisions that fit their changing needs and circumstances. The 3 biggest trends we see right now are: sustainability, ethical employment and centralising operations in the cloud.

As we can see, the way the company operates is beginning to be a determining factor for customers, and centralised and integrated end-to-end solutions will be vital for customer acquisition.

Shortage of qualified staff: The cornerstone of a company is its employees, we must be able to train and motivate our staff, this challenge is vital if we want to have long-lasting working relationships and retain talent.

Operational costs: We are currently experiencing rising costs. This is why the key will be to be able to reduce costs without affecting the quality of service. An important factor mentioned above is sustainability, through which we can make changes demanded by customers that will help us to reduce these operating costs without compro-

promising the service, in fact, increasing its quality.

Increasingly demanding customers: Today's travellers expect a personalised and unique experience and expect hotels to adapt to their individual needs and wishes. In addition, customers also expect a high quality of service throughout the Customer Journey.

This increased demand is partly due to the wide availability of information and options from other customers, allowing them to make informed decisions and compare services and prices. In addition, competition in the hotel industry is increasing, forcing us to constantly improve our services and differentiate ourselves from the competition.

To meet the demands of discerning customers, hotels must strive to offer unique and personalised experiences that are tailored to individual customer needs and preferences, including additional services, personalised packages, local activities and cultural experiences, and exceptional customer service at all points of sale and customer contact.

Although customers are increasingly demanding, they are also willing to pay for a quality experience. Therefore, at Vincci we are always working to improve the offer and satisfy customer demands in order to gain a competitive advantage and improve profitability in the long term.

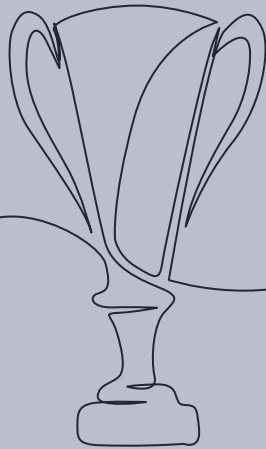
Greater customer loyalty: Today's customers are demanding, and we must make a great effort to retain them. This is the path to follow so that customers feel that they have had a unique experience and decide to choose us again.

Boredom and disenchantment of the citizens of some areas against tourism: The concentration of tourism in city areas is displacing citizens and generating a rejection of mass tourism. It is our task to also attract residents and avoid this disenchantment by ensuring that our hotels are integrated into the life of each city where they are present.

Inflation and rising interest rates: A global problem that affects the purchasing power of citizens and of course tourism consumption.

Customer attraction from competing destinations such as Turkey and Egypt, this is an element that will always be present, Spain is a mature destination but one that is reinventing itself and adapting to the changing circumstances of the present day and the preferences of customers.

Legislation: unequal legislation depending on the region is another danger. The different regulations do not allow for homogeneous processes.



ACHIEVEMENTS

In *2022*
we have achieved:

- > FARO Document Manager Implementation
- > UNESCO signature, commitment to sustainable tourism
- > Registration of Carbon Footprint Verification and Offsetting with the Ministry of Ecological Transition and Demographic Challenge
- > Best Practice Award
- > Madrid Metropolitano Award
- > Ecostar Certificat

By *2023*
we aim to achieve
the following goals:

- > Completing the Plastic Free project
- > Implementing a food waste project
- > ISO 50001 Certification
- > Systems integration
- > Increasing fundraising for Children's Villages



GOALS

RESPONSIBLE MANAGEMENT.

Financial performance gives us a better understanding of Vincci Hotels and its commitment to sustainability. Our involvement in sustainability is long-term, bearing in mind that our activity has a direct impact on the economic conditions of our stakeholders and on the local, national and international systems where our hotels are located.

Each of the Group's departments has its own mission, but only by working together can we meet the goals set out in our environmental policy. These daily challenges, together with the experience we have gained over the years and the knowledge we already have in the field of sustainability, allow us to meet our challenges and continue to make progress.

To strengthen our commitment to environmental care, we need to have key strategies in place that are well organised and well defined. Our sector is in the midst of development, but we must not lose sight of where we are starting from and where we are heading. After the economic crisis, it is time to move on to new goals, especially when it comes to achieving the planet that future generations deserve.

Under these criteria of responsible management, our budgets are in line with the criteria of transparency that has always defined us. In compliance with current legislation, the annual accounts of our chain are externally audited by Deloitte, S.L. In this sense, our Revenue Management or pricing policy

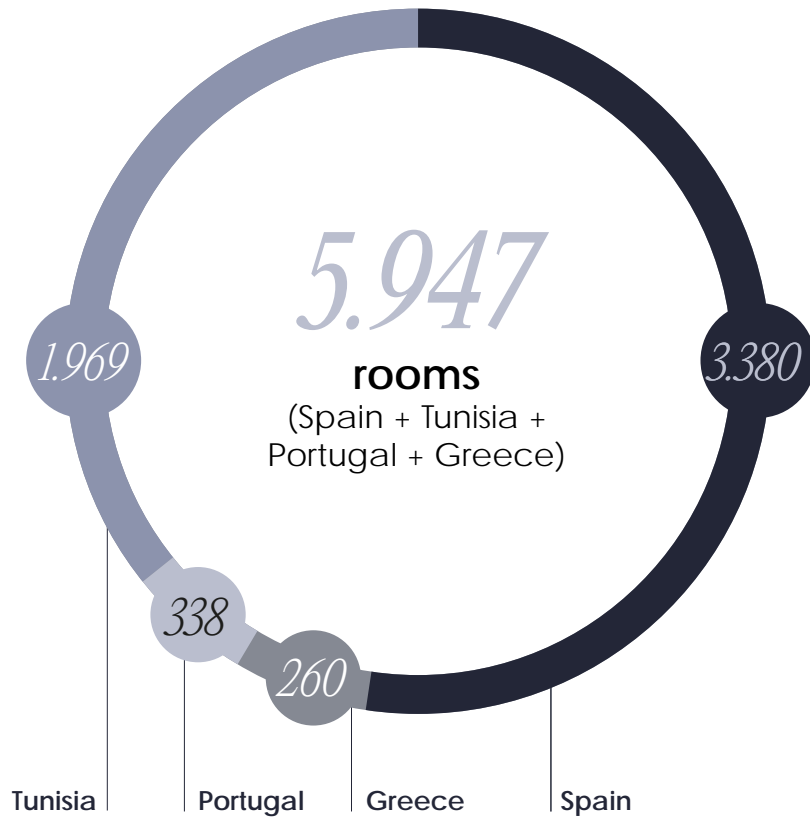
is based on parameters such as the degree of room occupancy, or on economic indicators such as the Revenue per Available Room (RevPar), or the Average Daily Rate (ADR).



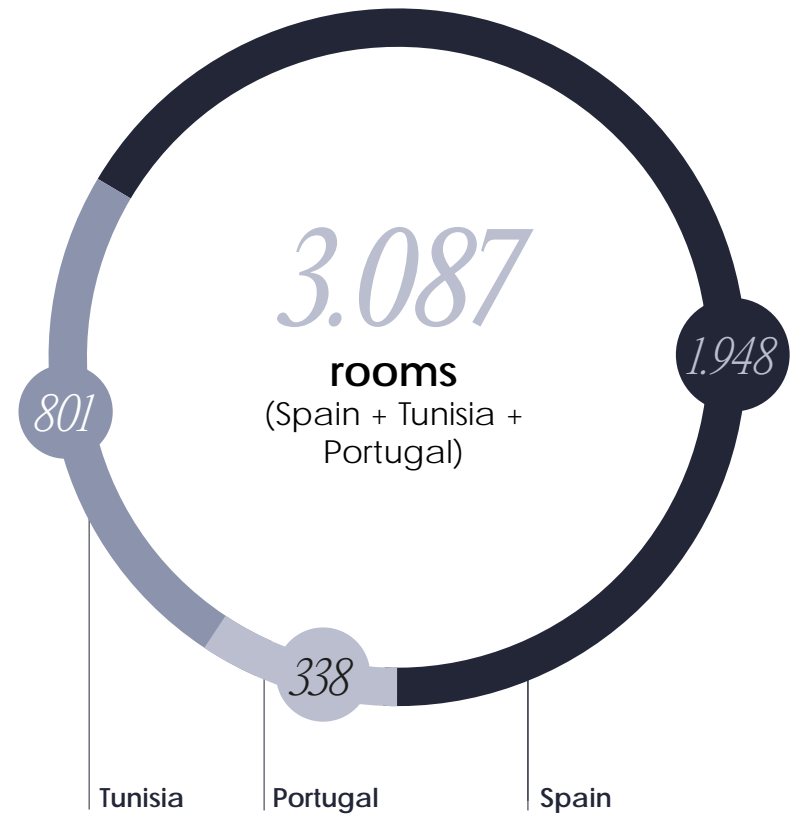
1.6 FINANCIAL DIMENSION

THE ORGANISATION IN FIGURES.

Total rooms of the Vincci Hotels Hotel Chain:



Total rooms of the Vincci Hotels Hotel Chain:



01 ABOUT THIS REPORT

	2019	2020	2021	2022
Total turnover (net turnover)	163.430.107	46.455.466	90.082.543	181.422.211
Occupied Rooms	1.212.586	372.651	661.131	1.075.730
Average occupancy	79,60%	27,58%	47,74%	75,52%
Number of customers accommodated	1.874.497	664.523	1.179.742	1.937.189

Total subsidies received	489.266
Capital subsidies	89.669
Operating subsidies	399.597
Corporate Income Tax - Revenue / (expense)	(6.332.274)

	Perimeter Group	Spain	Portugal	Tunisia
Profit / (Loss) after tax*	24.805.223	19.643.086	3.093.077	2.069.060
Net turnover*	181.422.211	153.788.665	17.921.096	9.712.449
Annual profit*	24.805.223	19.643.086	3.093.077	2.069.060
Operating result*	33.315.127	27.889.973	3.415.705	2.009.449

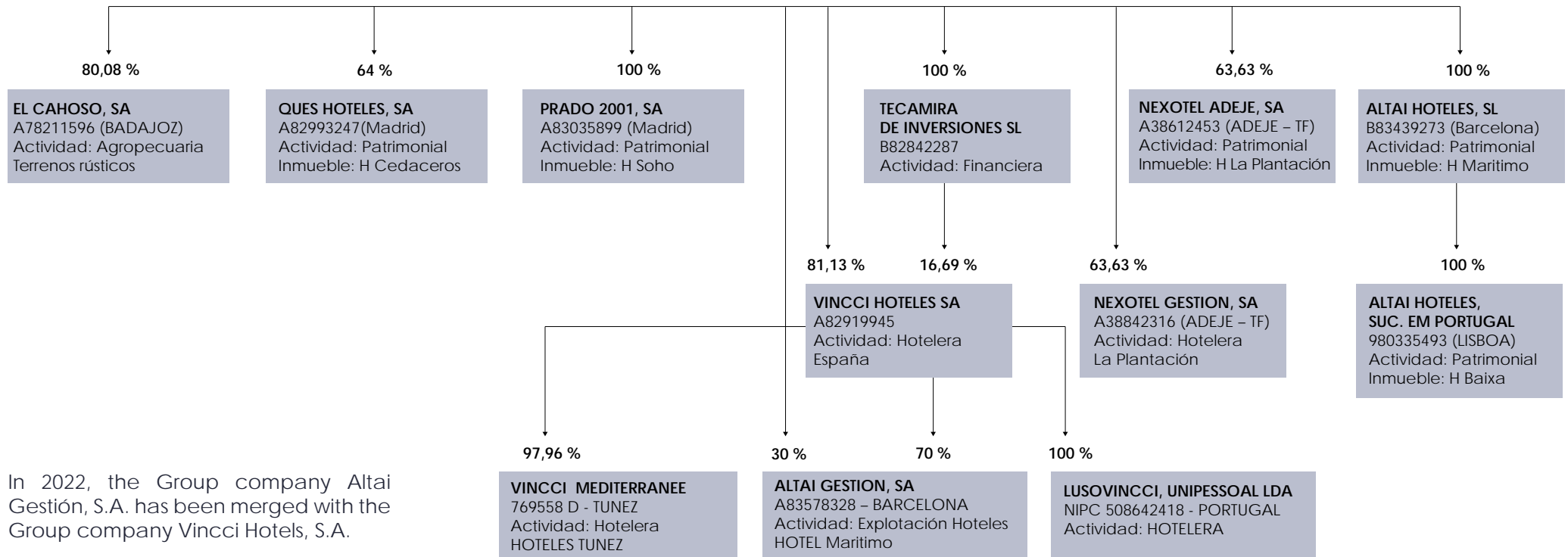
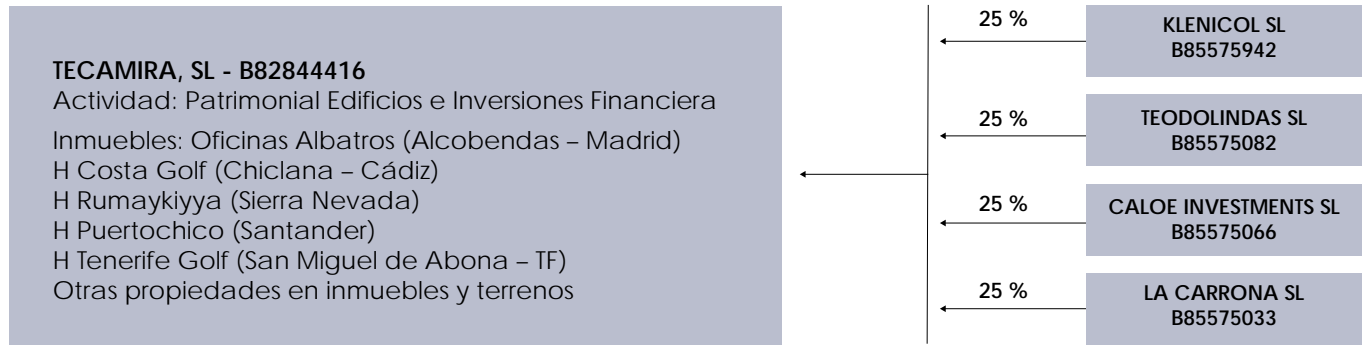
*Data in euros / 2022 data.

Traducción del cuadro

In order to achieve long term and sustainable profitability, it is essential to adjust annual budgets and contain spending at both head office and hotel levels.

List of entities included in the organisation's consolidated financial statements or equivalent documents.

The structure of the Group is as follows:



In 2022, the Group company Altai Gestión, S.A. has been merged with the Group company Vincci Hotels, S.A.

Certain environmental and social information of the companies Ques Hoteles S.A., Prado 2001 S.A., Altai Hoteles S.L. and Altai Hoteles Suc. Em Portugal is not disclosed in this Sustainability Report as its repercussion is not significant for the Group since these are patrimonial companies. The company El Cahoso, S.A. is not included either, as this company is integrated into the Group under the equity method of consolidation.

GREEN ECONOMY

Tourism is a source of wealth for those communities where the activity takes place, but we must not forget that global progress must come from the Sustainable Development Goals, with respect for the local population, cultural heritage and the environment. Only through a global commitment can we build a better world. For this reason, from our chain we try to improve the quality of life of the community that welcomes us, always thinking about achieving a fairer society that respects the environment. The joint attitude of responsibility of employees, suppliers and customers is the key element to achieve sustainable criteria, while supporting the most needy social groups, people with disabilities and groups at risk of social exclusion.

The green economy is key to improving human well-being and an indispensable element in achieving social equality, and reducing environmental risks and ecological scarcity, according to the United Nations Environment Programme (UNEP). It was given a major boost as early as 2012, when the United Nations Conference on Sustainable Development considered it to be a very useful

tool for achieving poverty eradication and sustainable development.

Vincci Hotels maintains among its green or circular economy objectives the challenge of reducing greenhouse gas emissions and the use of natural resources. This implies less waste generation and a reduction, as far as possible, of social inequalities. All this without forgetting the return on investment of natural, human and economic capital in a system that optimises the flow of goods and services to get the best out of raw materials, while minimising waste.

According to the International Labour Organisation (ILO), green jobs are all jobs that contribute to preserving and restoring the environment, both in traditional and emerging sectors. For Vincci Hotels, these jobs help to meet the following challenges:

- Increased efficiency of energy consumption and raw materials.
- Limiting greenhouse gas emissions.
- Reduction of waste and pollution.
- Adaptation to climate change.

Our Group collaborates with organisations that are committed to the great social and environmental challenges facing our society. These institutions and organisations work at a local level in the areas where our establishments are located, sharing Vincci Hotels' mission, vision and values.

Our commitment to social programmes are already part of our internal processes, which gives us added value and differentiates us as a chain. In

this way, our employees care about the impact of the activity we carry out, so they are firmly committed to making this planet a better world.

In this sense, we are very proud of our collaboration with organisations that strive to improve the comprehensive training and integration of people at risk of social exclusion. At Vincci Hotels we try to encourage their personal and educational growth, and we provide them with an immersion into the workplace in accordance with their abilities.

SUPPLY CHAIN

For Vincci Hotels it is a priority to achieve the highest levels of sustainability, quality and profitability in the exercise of its activity, which entails exquisite care when selecting suppliers and collaborators. The hotel purchasing process is marked by different environmental and social aspects, which make the difference in the selection of suppliers:

- Recycled packaging (environmental)
- Supplier and product certification (environmental)
- Kilometre 0 (environmental and social)
- Proximity of the warehouse to avoid long journeys (environmental)
- Emission-free vehicles (environmental)

Our collaborating companies share our values and the same business vision, adopting the environmental and social protection criteria that characterise our Company.

1.7

PERIOD, DEADLINE AND CONTACT POINT FOR QUESTIONS

The main local suppliers were informed of Vincci Hotels' environmental policy by e-mail or post. They were also asked about their different environmental, quality, product and occupational risk prevention certifications.

The information from the certifications has been recorded in a supplier file and helps us to carry out joint projects, such as packaging changes. The aim is that our collaborators stop being suppliers and become partners with whom we can develop joint actions related to the environment. The information about the suppliers most involved in the implementation of these changes allows us to focus an increase in the volume of purchases on them.

In 2022, no supplier visits have been carried out.

Reporting period for the information provided:

Annual financial year ended 31 December 2022

The reporting cycle:

Annual

The contact point for questions about the report or its contents:

You can send us any doubts, questions or suggestions about its content, or make comments about the Sustainability Report at the following e-mail address or by post to our head office:

✉ calidad@vinccihoteles.com

📍 Vincci Hoteles, S.A.
Anabel Segura, 11. Edif. A Bajo.
Centro de Negocios Albatros
28108 Arroyo de la Vega - Alcobendas
(Madrid)





02.

LEADERSHIP AND GOOD GOVERNANCE

2.1 Business Model

2.2 Values, Principles, Standards and Policies

2.3 Main Non-Financial Risks

2.4 Corruption and Bribery

2.1

BUSINESS MODEL

2.1.1 Name of the company.

Tecamira S.L. and Subsidiaries, commercially known as “Vincci Hotels Group”. (Hereinafter “Group”, “Company”, “Vincci” or “Vincci Hotels”).

2.1.2 Activities, brands, products and services.

HOTEL MANAGEMENT MODELS.

Ownership: Through its holding companies, the Group owns the establishments, bears the business risk and assumes both the profits and costs of the activity.

Renting: Vincci Hotels rents properties for operation for a specific period of time, setting a rental fee that may be a variable or fixed amount, depending on the contract. The business unit is determined by an agreement on the decision-making capacity of both parties. Vincci Hotels acts as manager, taking charge of the operation of the establishment and taking care of the processes in return for the agreed fees. The Group offers the advantages of its own working model, brand portfolio, collaboration agreements

and its extensive experience in the sector.

Management: Vincci Hotels is responsible for the management of the hotels, but not for their operation.

OUR PRODUCTS:

Hotels and Spa: Our mission is to offer a personalised service characterised by the highest quality, with a focus on excellence and the utmost care in every detail. With this objective in mind, our Group has consolidated its position as the leading reference in its sector at a national and international level. One of the differential values of Vincci Hotels is the careful location of its establishments, always in places that stand out for their scenic, social and cultural richness. In order to make our guests feel comfortable, we combine the latest technological advances with personalised attention. We want our clients to enjoy each of our hotels to the maximum, regardless of the need that has motivated their choice. For this reason, all the rooms in our establishments have an exclusive design, capable of surprising, with a wealth of details and their own identity criteria in terms of quality and design.

Our clients arrive at the hotel with high expectations that we take care to improve, whether their stay is for leisure, business or family reasons. We offer solutions to each and every one of our clients’ needs, whether in urban settings or in beach destinations, or in establishments focused on snow or golf. Both in the Vincci Selection line and in the Vincci Hotels we work to make our guests feel comfortable when they walk through the front door, ensuring that they can relax in an environment where comfort and attention are the great added values.

Vincci Selection: Our Vincci Selection hotels are 5-star establishments located in privileged destinations. These hotels are characterised by the highest standards of comfort, exquisite customer service and maximum quality. Every corner of these establishments is designed for the customer’s enjoyment. For this reason, we offer a wide range of services aimed at relaxation, including spas, jacuzzis and thalassotherapy services, the best option for relaxing after a day of sightseeing, shopping, business, beach or sporting activities.

Vincci Hotels: Our Vincci Hotels are 4-star establishments oriented towards comfort, complemented

by a personalised and specialised service when it comes to resolving any need. They are located in strategic locations and, thanks to advanced technology, our guests can enjoy an authentic Vincci experience, which makes these establishments the perfect hotels for businessmen and women, as well as for those looking for leisure, tourism or a few days' rest with the family. Each of the hotels has its own personality and is different from the rest. Their meticulous decoration and original design establish a characteristic identity, with corners that invite you to relax and a multitude of details that make each stay an unforgettable memory.

nAmmu Spa Areas: The nAmmu Spa Areas are exclusive thermal spaces at the Vincci, Hotels which have been created thinking about the care of body and mind. It is a new concept of relaxation where the client can find relaxing facilities with the most modern hydromassage baths, effective jet services, therapeutic mud and the most up-to-date beauty treatments, in which the client is pampered with quality cosmetics. We have specialised staff who make customer service an exclusive, personalised and relaxing experience. Supported by their professional experience, and under the supervision of a qualified medical service, the client is guided on the available treatments, advising them on those that best suit their needs.

2.1.3 Location of the headquarters.

Anabel Segura, 11. Edif. A Bajo. Centro de Negocios Albatros 28108 Arroyo de la Vega - Alcobendas (Madrid).

2.1.4 Location of operations.

Indicate the number of countries where the organisation operates, specifying the countries where it carries out the most significant or relevant operations for the issues covered in the report.

Spain, Portugal, Greece and Tunisia

2.1.5 Ownership and legal form.

The Group's parent company is registered as: TECAMIRA S.L., which is registered in Madrid in volume 16,037, paper 12, section 8, page 8, sheet no. M271455, tax identification number B82844416.

2.1.6 Executive level responsibility for economic, environmental and social issues.

Executive-level positions that the organisation has appointed with responsibility for economic, environmental and social topics.



CORPORATE ORGANISATION CHART:

General Manager:

MR. CARLOS CALERO

General Manager North Zone and Tunisia:

MR. MIGUEL ÁNGEL CALERO

General Manager South Zone
and Portugal:

MR. RAFAEL CALERO

Decoration and Interior Design Director:

MS. TERESA CALERO

Dir. Administration and Finance:

MR. JOSÉ LUIS ALDEA

Works and Maintenance Manager:

MR. MIGUEL GUERRERO

Purchasing Manager:

MS. MYRIAM RODRÍGUEZ

Quality and Sustainability Director:

MR. CÉSAR PÉREZ

Expansion Manager:

MR. MIGUEL FUENTES

Systems Manager:

MR. PABLO MUÑIZ

Dir. Revenue & Sales:

MS. AMAYA LACAMBRA

Legal Counsel:

MS. ESTRELLA MARUGÁN

HR Director:

MR. MARCOS VALERA

Head of Marketing and Communication:

*MS. AIXA RODRÍGUEZ
DEL ALISAL*

F&B Director:

MR. ENRIQUE LEZCANO

Head of Digital Strategy and Business
Development:

MR. NÉSTOR ALDEA

2.2

VALUES, PRINCIPLES, STANDARDS AND POLICIES

2.2.1 Values, principles, standards and norms of conduct.

Description of the organisation's values, principles, standards and norms of behaviour.

CODE OF ETHICS.

All the procedures developed by Vincci Hotels are encompassed in the Company's Code of Ethics, which constitutes an effective and coherent framework of social responsibility. In order to carry out our activity satisfactorily and continue being a benchmark in the sector, we must have professionals who are characterised by their solid values and who work in an unimpeachable ethical environment.

The Code of Ethics of Vincci Hotels reflects the philosophy that characterises us and constitutes an inherent element of our model of action, which in turn defines us as a Group in the face of our competitors. Our work is carried out within a framework of respect, which is the basis for maintaining an impeccable reputation and an ironclad approach to preventing corruption.

In this sense, and with the aim of preventing acts derived from corruption and money laundering, Vincci Hotels complies with current regulations and audits its annual accounts in Spain through the company Deloitte, S.L., making them public so that any interested party can consult them. Internally, the Finance Department of the central offices also carries out audits to check that the management of the hotels complies with the legal framework.

In addition, when auditing the various operations of the administration department of the establishments, there are procedures that must be followed by the directors, who have the power of authorisation. These procedures have been drawn up by the Central Offices and make it possible to control that all the Group's accounts comply with the regulations in force. So far, we have had no complaints from the Public Administration in this respect.

Our business model is solvent and success-oriented because it is focused on a socially responsible code of conduct, both externally and internally. All professionals with responsibility in the chain, especially those who are in charge of teams, are aware of this Code of Ethics, which serves as a reference, setting an example with their actions.

The Vincci Hotels Code of Ethics can be found on our Intranet and on the Sustainability Microsite. This code is given to all new employees as part of the Welcome Pack. Any employee who wishes to consult it can do so and it is open to anyone who wants to know about it. This commitment to the Company's employees' intentions is a guarantee for our customers, who are served by employees who are aware of the responsibility that their actions entail. Our attitude of service, together with the relationships we maintain with customers and suppliers, enables us to meet the objectives and challenges we have set ourselves, and is a reflection of what the Company is like in terms of the actions of its employees.

Vincci Hotels' support is, therefore, the ethical, upright and irreproachable conduct of each and every one of its employees.

SDGs we contribute to:



2.2.2 Organisational management approach to corruption and bribery; human rights; labour; environment; supply chain.

Procedures adopted by the organisation on corruption and bribery; human rights; labour; environment and supply chain.

The current focus of Vincci Hotels' procedures is one of precaution and prevention. The chain has procedures for all its departments at an operational level, and in turn, due to ISO14001:2015 certification, we have procedures for environmental management. These procedures (Environment and Supply Chain) can be consulted on the Intranet, and are therefore available to all staff.

The legal department is currently defining the Compliance procedures which will be communicated once they have been approved.

VINCCI HOTEL POLICIES

Sustainability Policy

↓ <https://sostenibilidad.vinccihoteles.com/wp-content/uploads/2021/03/Pol%C3%ADtica-sostenibilidad-ES.pdf>

CSR Policy

↓ https://sostenibilidad.vinccihoteles.com/wp-content/uploads/2018/03/Politica_RSC_ES.pdf

Children's Policy

↓ https://sostenibilidad.vinccihoteles.com/wp-content/uploads/2018/03/Politica_ProteccionMenor_ES.pdf

Quality and Environmental Policy

↓ https://sostenibilidad.vinccihoteles.com/wp-content/uploads/2018/03/Politica_CalidadMedioAmbiente_ES.pdf

SUSTAINABLE PURCHASING POLICY.

Since its foundation, Vincci Hotels has integrated the values of sustainability and social commitment as benchmarks in its strategies and this, together with its international character, makes it necessary to define policies that allow global management with common guidelines that ensure standardisation in services and uniformity in our levels of quality.

For this reason, this sustainable purchasing and contracting policy is defined, which aims to regulate relations with our suppliers, as well as the values that they must maintain as basic requirements and which, among others, will be all those linked to respect for Human Rights, environmental protection, social development and ethical behaviour.

TRAINING POLICY.

Our Training Policy revolves around a number of Principles:

- Ensuring employee training
- Ensuring the quality of the service provided and of the final product.
- Promoting the internalisation of values, behaviours and culture
- Meeting current and future needs of the organisation

This training policy is aligned with our strategic objective: to be a leader in the hotel offer in the four and five-star hotel segment.

An Energy, Anti-Corruption and Crime and Bribery Prevention Policy has been created in 2022.

2.3 MAIN NON-FINANCIAL *RISKS*

2.3.1 Main impacts, risks and opportunities.

STRENGTHS: Environmental certification, Environmental training Staff involvement, Green energy contract, Purchase of products in bulk, Hotel processing, Environmentally responsible equipment, Use of leftover food for other processing, Movement sensors in staff areas, Sustainable mobility, Products for the maintenance of ecological gardens, Internal segregation of staff, Sheets and paper screen-printed with certification, PDQ, Management support, Accessibility, Sustainable purchasing policy, Key room via app, CO₂ calculator for customers.

WEAKNESSES: Environmental communication, Segregation at source (rooms), Average Vincci stays, Energy efficiency, own energy generation, Offer electronic billing, Resources for environmental actions, Segregation of organic waste because it was not collected by the City Council, Hotels with propane and diesel, Offer of single-dose products at breakfast, Km0 products, Purchase of seasonal products, Lack of Energy Efficiency Labels for Buildings, Minibars (Label D), Soundproofing of rooms,

Temperature adjustments in rooms, Swimming pools with chlorine, Swimming pools with chlorine, Single-dose amenities, Sewage disposal, Waste control. D), Soundproofing of rooms, Temperature adjustments in rooms, Swimming pools with chlorine, Single-dose amenities, Dumping into sewers, Waste control.

THREATS: Legislation, Sea pollution, Atmospheric pollution, Climate change, Police records, Cost of ecological products, Lack of public aid to large companies for environmental projects, Arab and Asian clients, Covid, Over-information of clients.

OPPORTUNITIES: Recycling of various waste, Carbon footprint calculation, Sale of waste, Voluntary actions, Customer awareness (responsible tourist), Variety of ecological products, Circular economy (zero waste), Filtered water, Artificial Intelligence, Energy generation equipment, Collaborations with stakeholders, Increased sale of electric cars, Local economy, Digital transformation, Increased water and energy costs, Customer loyalty through environmental policy, Certified products, Purchasing from local cooperatives.

2.3.2 Operations with significant negative impacts.

There are no operations with significant negative impact.

2.4

CORRUPTION AND BRIBERY

2.4.1 Mechanisms for evaluating the effectiveness of the anti-corruption and anti-bribery management approach and its results.

In order to be able to have a comprehensive Criminal Compliance procedure that brings together all the policies of Vincci Hotels, we are currently working with an external company that has been commissioned to carry out the work necessary for its implementation. We are currently working on a Risk Analysis Report by department.

2.4.2 Development programmes.

Currently, the chain has an agreement with Children's Villages. The SOS Children's Villages organisation, has the objective of helping one of the most vulnerable groups, such as children, which is perfectly in line with the social policy followed by our chain. Some of the actions we have carried out are: Donation through payroll, physical collection in the hotel on Children's Day, a dish has been selected (in some of the hotel restaurants), which is a Solidarity Dish and the amount is donated, we have the solidarity menus and the Christmas campaign.





03.

ENVIRONMENTAL CAPITAL

3.1 Environment

3.2 Pollution

3.3 Circular Economy, Waste Prevention and
Management

3.4 Sustainable Use of Resources

3.5 Climate Change

3.6 Protection of Biodiversity

3.1 ENVIRONMENT

3.1.1 Mechanisms for evaluating the effectiveness of the environmental management approach and its results.

“Our chain has always been committed to different ways of acting in the area of corporate social responsibility and every year setting out new challenges for the coming years. Since our origins at Vincci Hotels we have set ourselves a series of commitments related to respect for the social and environmental surroundings in a sector that has always been one of the main economic engines of our country. All of this is included for yet another year in this Annual Sustainability Report, which reflects all our achievements in this area, as well as our goals.

In the last year, we have taken advantage of the opportunity to establish different procedures that have contributed to our continued improvement in terms of sustainability, at the same time as we continue to make progress in new actions. For example, we plan to undertake the plastic waste circularity audit with the intention of finding out the destination of the plastic waste we have in the

hotels, and thus be able to promote its recycling to become raw material for other products.

One of our objectives is to implement HACCP software, a system to control food waste, which also involves the digitalisation of the F&B departments. We also plan to implement digital monitoring software for energy and water consumption in hotels. This will allow us to incorporate the data into the software and analyse large amounts of data, which will provide us with information to propose improvements in the hotels.

Another of our goals, and in line with this latest project, is the certification of all hotels in Spain and Portugal with the ISO 50001 Energy Efficiency standard, this standard helps to study, analyse and carry out actions to improve the energy efficiency of hotels. We are also working on the integration of systems, as we are currently certified by ISO 14001 and this year we will be certified by ISO 50001, and for next year the two certifications will be integrated both in the internal audits and in the document management system that we have.

Among the many actions we also intend to continue to build loyalty in our collaboration with

SOS Children's Villages by promoting certain measures that contribute to increasing the funds raised for this children's aid organisation.

In short, different initiatives that we believe will contribute to a sustainable business model and to raising awareness about taking the necessary steps towards tourism that is more beneficial for the environment and the social and cultural environment and, ultimately, for the traveller himself”.

César Pérez
Director of Quality and Sustainability



WHAT IS ISO 14001:2015?

The ISO 14001:2015 international standard for Environmental Management Systems (EMS) presents a measurement system for companies which implement it to design, manage and improve their environmental policy.

This internationally recognised standard is easy to integrate with other ISO standards. Its application by an organisation is synonymous with the involvement of the main stakeholders in environmental matters, and proposes a redefinition of environmental needs, as well as a correct identification of the main requirements of the company's environmental policy. In addition, the standard also reflects the involvement of top management in the effective management of environmental resources and the better integration of EMS requirements into business processes.

Vincci Hotels has always been aware of the risks and opportunities posed by the environmental challenges it has faced. Having the backing of an international standard in this commitment is not only a recognition of the management carried out, but also a contribution of enthusiasm to continue improving internally and to finish defining the objectives that form part of this management focused on respect for the environment that has characterised the Company since its birth.

Within the certified Vincci Hotels establishments, some external and internal risks have been detected. These risks are identified through the SWOTs carried out by the hotels. These are the most frequently repeated and are the ones on which action is already being taken.

- Customer Communication.
- Electronic invoicing.
- Single-dose amenities.
- Carbon Footprint Calculation/Carbon Offsetting.
- Voluntary actions.

The Group companies within the Environmental Management System are:

- Vincci Hotels S.A.
- Nexotel Adeje S.A.
- Lusovincci Unipessoal LDA.

Our organisation is fully aware of the impacts generated by its activity, directing all its efforts to their reduction and to the effective control of the processes determined by our activity.

Requirements reinforced by ISO 14001:2015

- Senior management leadership.
- Legal requirements and others.
- External communication with identified stakeholders.
- Continuous improvement, environmental performance and indicators.
- Documented information.

In 2022, there has been no analysis of worker, social or grievance risks. It has only been carried out at environmental level. It will be carried out in the following years.

OTHER CERTIFICATIONS.

Among the sustainability and quality-oriented certifications belonging to different hotels of the chain that join the ISO 14001:2015 are the following:

TRAVELIFE



Internationally recognised quality certification specific to the tourism sector, which summarises the Company's commitment to the environment. The hotels with Travelife Gold certification are:

- Vincci Selection Posada del Patio.
- Vincci Selection La Plantación del Sur.
- Vincci Costa Golf.
- Vincci Tenerife Golf.
- Vincci Estrella del Mar Selection.

TOURISM QUALITY COMMITMENT



The Integral System of Spanish Tourism Quality in Destinations (SICTED) is designed by the Secretary of State for Tourism with the collaboration of the Spanish Federation of Municipalities and Provinces. This certification confirms the quality of tourist destinations and their potential to provide a quality customer experience.

The objective of this quality management system is continuous improvement. To this end, it establishes common objectives to be met by the agents involved, which result in a homogeneous level of quality in the services and, in turn, make it possible to correct any deficiencies that are detected.

These are the Vincci establishments that hold this prestigious certification:

- Vincci Selection Posada del Patio.
- Vincci Malaga.

QSC CERTIFICATE

The QSC seal is awarded by the Chinese National Tourism Administration. It is the equivalent of the Spanish Q for Tourism Quality seal and distinguishes the establishment that possesses it as a tourism service provider according to the criteria of excellence required for tourism from China.

Vincci Selection Posada del Patio obtained this certification in 2017, becoming the first hotel in Malaga to achieve it.

BIOSPHERE CERTIFICATE

The Biosphere seal is a system for measuring sustainability, with the aim of functioning as a tool for continuous improvement.

- Vincci Mae.
- Vincci Tenerife Golf.
- Vincci Selection La Plantación del Sur.

SDGs we contribute to:



The result of the management approach can be seen in the Minutes of the Management Review of the Environmental Management System and External Audit.

Specific environmental actions such as; processes, projects, programmes and initiatives.

In 2021, an Ecological Transition Plan was drawn up in accordance with the 2030 Agenda, which includes several important areas of action for the company:

- Carbon Footprint Reduction Plan.
- Waste Management and Reduction Plan.
- Healthy and Sustainable F&B Plan.
- CSR Plan.
- Sustainable Water Use Plan.

All plans have targets to 2030 along with measures that will be adopted during this time.

3.1.2 Precautionary principle or approach to protect the environment from a risk of serious or irreversible damage.

MANUAL OF GOOD ENVIRONMENTAL PRACTICES.

Vincci Hotels, with the aim of guiding its employees in the need to achieve sustainable goals, offers them the Manual of Good Environmental Practices. We are convinced that the employ-

ees themselves have the power to achieve these sustainability objectives and reduce their environmental impact by reorganising their activities and processes to this end.

The handbook brings together good practices that are simple to implement and highly effective. They offer quick, efficient and lasting results, and seek a change of mentality and attitude on the part of professionals through the simple gesture of reorganising their daily tasks. In addition, and in order to raise the awareness of its employees more effectively, each of our professionals receives monthly the Green News, which explain the lines of environmental action proposed by the chain.

The Good Practice Manual is structured by department and includes practical tips that workers can easily apply to their daily tasks. With minimal investment, the following goals can be achieved:

- **Reduction of energy and water consumption.** These reductions are contemplated in several establishments, as they are environmental aspects considered significant in our Environmental Management System. Some of the measures that have been carried out in recent years are: introduction of LEDs in the hotel lighting, replacement of windows with others that improve insulation, replacement of boilers with more efficient ones, revisions of the flow reducers on taps and training for chambermaids in more efficient use of water in cleaning, among other measures. Some hotels already have solar thermal panels for DHW (air conditioning system) and/or air-conditioning, which are checked according to the current RITE Regula-

tion of Thermal Installations in buildings). One hotel has photovoltaic panels, another has a micro cogeneration system, and heat pumps are used for DHW and pool heating.

- **Less waste generation.** We achieve this objective by replacing the purchase of single-dose products with bulk products, and also by using leftovers to make other products (e.g. fruit, which is reused to make smoothies for the breakfast buffet, and pastries, which are used to make puddings), making products in the hotel to avoid buying packaged products (e.g. cakes, tarts, jams, etc.), and a water and salt hydrolysis machine that prevents us from buying chemical products and generating more packaging. There are also several salt pools, which means that we do not have to buy chlorine, thus avoiding the generation of packaging.
- **Enhancement of waste recycling.** This is achieved by increasing the number of recycling points for customers. In addition, the chambermaids' trolleys are equipped with bags to classify the waste that the customer leaves outside the waste bin in the room, better segregating organic waste so that it does not go to the undifferentiated waste bin. By studying the life cycle of products, we can guarantee their correct destination and their recycling, reuse, recovery or disposal (the latter is a minority of the waste we generate).
- **Reduced atmospheric emissions, discharges and pollution.** There are procedures in some hotels that change sheets every 3 days and avoid changing towels if the client leaves them hanging. We have a green energy contract for

most of the hotels and analyses are carried out to know what we discharge into the sewage system. In some establishments we have water and salt hydrolysis machines (which prevents us from using chemical products and not dumping them, even if they are biodegradable), collaborating in beach clean-ups and communicating to clients the importance of this to prevent pollution.

- **Strengthening the business strategy by introducing environmental protection as a continuous improvement.**
- **Prevention and control of environmental aspects in all the processes of its application.**
- **Anticipation of market demands.**
- **Environmental training of employees.**
- **Compliance with current legislation and implementation of the ISO 14001 standard** in all establishments.

SDGs we contribute to:



ENVIRONMENTAL GUIDE FOR SUPPLIERS AND SUBCONTRACTORS

When it comes to protecting the environment, our collaborators play a fundamental role. The Environmental Guide for Suppliers and Subcontractors drawn up by Vincci Hotels is aimed at those agents whose products or services can have a significant

impact on the environment, including the following:

- Suppliers of chemicals and hazardous substances.
- Transport companies and services.
- Cleaning services and chemical applicators.
- Waste managers.
- Subcontractors and/or industrial maintenance companies.

The Environmental Guide for Suppliers and Subcontractors is an effective tool for making effective and public our commitment to environmental conservation and the study of the activity of suppliers and subcontractors that can affect the sustainability of the planet.

The supplier or subcontractor who signs this document is establishing their commitment to comply with what the regulations establish, in addition to the premises set out in the guide. This is an added guarantee for all our clients and society in general. Vincci Hotels takes care of checking that what has been agreed is being complied with, storing the certifications that our collaborators send us.

SDGs we contribute to:



ENVIRONMENTAL ASPECTS.

The Quality and Environment Department, supported by the hotels' management, analyses the activities that take place in each of their establishments under the criteria of control, awareness and minimisation, in order to assess a possible environmental impact. This study covers both regular and one-off, direct and indirect actions, as well as emergency or potential emergency situations.

After the identification and evaluation of these environmental parameters, the analysis is focused on establishing action measures for both processes that have a low environmental impact and those that have a high level of impact on the environment.

The indicators are calculated on the basis of specific calculation protocols. In this way, homogeneous criteria are applied, which are adapted year after year to adjust to the reality of a constantly changing environment, focusing on both direct and indirect aspects of the areas established as priorities.

Direct aspects:

- Resource consumption: energy, water and raw materials.
- Consumption of chemicals.
- Emissions of gases and odours.
- Waste water discharges.
- Generation of hazardous and non-hazardous waste.

- Noise pollution.
- Lighting, air-conditioning, DHW, meters, kitchen, other equipment.

Indirect aspects:

- Waste generation.
- Paper consumption.
- CO₂ emissions.
- Laundry.
- Waste.

At the end of 2022 the indirect aspects were changed to:

- Local suppliers.
- CO₂ emissions.
- Laundry.
- Generator set.

EMERGENCY SHEETS

All our hotels have established protocols for accidents and emergency situations. The aim is to identify them in the shortest possible time and thus be able to provide a highly effective response. This formula for action also includes measures to reduce environmental impacts and prevention measures to avoid them.

The emergency situations and the corresponding protocols detailed in the emergency sheets refer to:

- Fires.

- Gas explosions.
- Floods.
- Chemical spill.
- Legionella.
- Fuel spill
- Greenhouse gas emissions.

In 2022, a fire broke out in the Vincci Selection Posada del Patio.

LEGAL COMPLIANCE REVIEW

Every year, on at least two occasions, we carry out an internal audit to determine whether we comply with the local, regional, national and EU regulations applicable to our centres, which obliges us to be informed about the legislation in force and about any possible changes that may occur in the regulations so that they can be applied immediately.

As ignorance of the specifics of the regulations in force does not exempt us from complying with them, all the legal and environmental requirements applied are identified, made public and permanently updated. Throughout 2022, Vincci Hotels has not received any fines or sanctions for non-compliance with the rules or regulations that affect our activity.

SDGs we contribute to:



ENVIRONMENTAL OBJECTIVES

The environmental objectives we have set ourselves as a chain, and which are constantly reviewed, are a sign of our identity and allow us to know where we are heading and what the plan is to achieve our goals. We have specific, measurable, relevant and achievable objectives that will enable us to meet the challenges we have set ourselves.

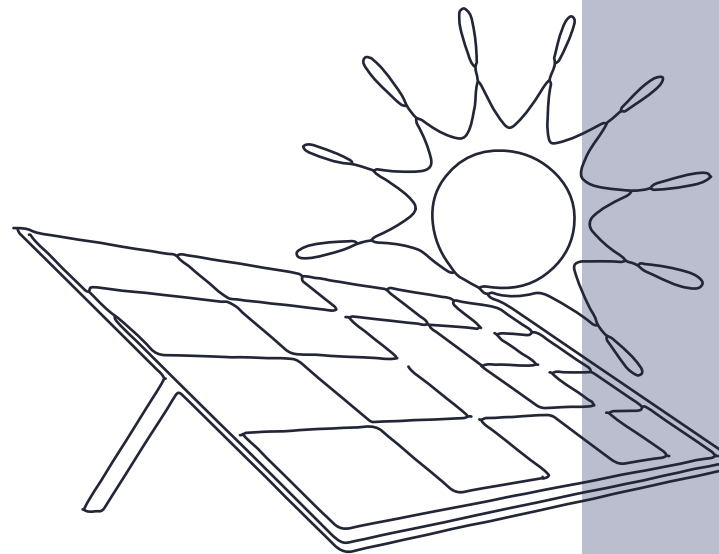
Our Environmental Management System has regular reviews in order to identify potential issues even before they arise, thus establishing a clear opportunity for improvement. The chain determines its extent and pace depending on a number of factors, including economic ones.

In addition to the general objectives of the chain, each of the establishments that make up Vincci Hotels has its own goals, although they are always included in the Company's Environmental Management System. Likewise, the central offices also have their own challenges and propose common objectives for the establishments so that the commitments derived from the environmental policy that defines the Group can be easily achieved. In this way, we manage to minimise the impact of our activity on the environment and optimise its performance.

On the other hand, the indicators associated with each environmental objective are also reviewed periodically, and in the event of detecting deviations from the environmental policy dictated by the Company, this allows us to take the appropriate preventive and corrective measures.

In order to achieve optimum development of the environmental policy set by Vincci Hotels, it is

essential that the Human Resources, Sales, Marketing and Systems departments work in a continuous and coordinated manner.



3.2 POLLUTION

3.2.1 Explain how the organisation manages air, light or noise pollution.

LIGHT.

The hotels control the switching off of the façades of the buildings, they participate annually in the “Earth Hour” action, which consists of switching off the lights on the façades on a certain day at a certain time to raise awareness. On the other hand, in 2018 in Tenerife they joined an initiative to turn off the lights of the terraces during the breeding of the Cory’s Shearwater to avoid dazzling and accidents of these birds. Not only was it modified for that period, but Tenerife Golf brought forward the time to turn off these lights throughout the year.

NOISE.

Noise pollution diminishes our health and our quality of life. For this reason, many of our hotels have noise reports, which include the appropriate checks of the installations and the correct functioning of machinery and equipment that

produce vibrations. No new noise reports have been carried out in 2022.

DUMPING.

Hotels have the same waste disposal problems as homes, only on a larger scale. In order to manage them and comply with current legislation, Vincci Hotels has assigned a system of waste control and maintenance plans that help to reduce the environmental impact involved.

The Group’s larger hotels are equipped with grease trap/separators, watertight containers that collect grey water and separate the elements by decanting, removing heavier solids, grease and detergents separately, thus preventing them from reaching the public sewage system.

Vincci Hotels is firmly committed to continuing its research into the latest techniques on the market that can help in the correct management of waste in its establishments. At the moment, and with the aim of reducing the consumption of chemical products, we have implemented a system that uses hydrolysis to mix water and salt, thus produc-

ing an antiseptic suitable for cleaning that avoids the generation of containers and spillages that pollute the environment.

3.2.2 Specifications on pollution.

Chemical-Free Cleaning Project: This has consisted of installing chemical-free cleaning equipment in hotels. Tests have been carried out to eliminate chemicals from dishwashers.

On the other hand, we continue with the **Plastic Free Project**, in which, in 2020, shampoo, gel and soap dispensers began to be installed in hotels, eliminating single-dose amenities, and products made in the hotel and bulk products have been included in breakfasts.

A list of authorised chemical products has been created for a better control of the consumption of these products and the central offices control that only authorised products are being purchased.

The hotels have segregation bins in common areas so that the client can help us with the correct segregation of waste.

3.3

CIRCULAR ECONOMY, WASTE PREVENTION AND MANAGEMENT

This year 2022 a new waste has been included in the NIMAs of the hotels (Environmental Identification Number), this new waste is Sanitary (LER 180103, syringes, for example), in the event that the client requires it, the hotel makes a container available on an individual basis so that this waste can be deposited and managed correctly.

3.3.1 Explain how the organisation manages waste.

HAZARDOUS AND NON-HAZARDOUS WASTE.

EU policies, in line with the European Parliament, are geared towards a gradual increase in mandatory recycling of municipal waste. The target to be achieved, which could be revised if appropriate, is to reach recycling of 55% of waste by 2025, 60% by 2030 and 65% by 2035, as well as a 10% decrease of waste to landfills.

Following this line of action, which is based on the responsibility of waste management, our chain has agreements with Ambilamp, ERP Spain, Acicla, Recuperaciones Pérez, etc., and makes use of municipal services and private initiative through companies that have been selected after a meticulous selection process. In this sense, we are aware that the consumption of amenities has a direct impact on the environment, both in terms of the use of chemical products and the generation of waste. For this reason, it is part of our waste management policy.

At Vincci Hotels we are moving towards the goal of achieving an optimum recycling policy that includes the correct segregation of waste. All our employees have taken part in awareness campaigns and have been trained in the good practices they should apply in their daily work. In addition, as a reminder of the permanent nature of their actions, the waste rooms have posters displaying the key information to remember.

The aptitude and attitude of our professionals is the element that determines success in the management of non-hazardous waste. The effort and involvement of our team has enabled us to respond to society with excellent results in recent years.

The kilos of urban waste (paper and cardboard, glass, packaging, organic and undifferentiated waste or rejects) for hotels in Madrid are exact data as they have a private waste manager. For the rest of the hotels, the weight is estimated as it is the City Council that collects it and we cannot have exact data.

03 ENVIRONMENTAL CAPITAL

	2020		2021		2022		2022 Perimeter Group	
	Kg	Kg/customer	Kg	Kg/customer	Kg	Kg/customer	Kg	Kg/customer
Paper and cardboard	86.430,06	0,15	128.752,25	0,08	164.054,81	0,1	159.902,30	0,1
Organic	35.307,97	0,06	63.129,13	0,04	239.629,60	0,14	226.278,35	0,14
Glass	99.664,59	0,17	154.953,95	0,09	190.082,78	0,11	185.850,00	0,12
Packaging	103.327,44	0,18	139.907,87	0,08	179.072,08	0,11	176.832,13	0,11
Undifferentiated	425.630,95	0,74	633.943,81	0,38	708.238,99	0,42	688.362,72	0,44
Grease decanter	30.460,00	0,05	10.260,00	0,01	18.677,00	0,01	15.817,00	0,01
Raees	3.831,00	0,01	835,00	0	3.913,00	0	2.855,00	0
Toners	141,55	0	186,95	0	677,09	0	566,64	0
Alkaline batteries	159,7	0	315,5	0	604,24	0	582,00	0
Pruning	0	0	20.785	0,01	31.119,00	0,02	31.119,00	0,02
Fluorescent, energy-saving and LED (LER 20 01 21)	94,00	0	167,42	0	215,54	0,000129	206,54	0,000132
Contaminated packaging (15 01 10)	647,00	0	79,00	0	1.077,00	0,000643	1.065,00	0,000682
Aerosols (LER 16 05 04)	26,00	0	1,00	0	27,00	0,000016	22,00	0,000014
Rags and absorbents (LER 15 02 02)	13,00	0	0	0	0	0	0	0

PAPER.

Reducing the purchase and consumption of paper is one of our priority environmental objectives. We have implemented virtual communication with our employees, suppliers and customers to reduce the use of paper, and we have also reduced the purchase of paper when sending invoices, letters and notifications, which has resulted in a lower environmental impact.

With regard to payroll management, we have an Employee Portal on the Intranet, where these documents can be consulted and downloaded. All our employees, both at the head office and in the different establishments, can access the information they need about their pay slips, directly and intuitively, which translates into a significant saving of paper.

Another measure aimed at saving paper is the use of electronic invoicing. The digitalisation of information is carried out with the implementation of PMS management software, which has the advantage of an agile, direct and efficient connection with suppliers and customers, as well as a clear environmental improvement. The implementation of the latest technologies also makes a difference in purchasing, invoicing and administration processes, facilitating aspects such as statistics, stock management, invoice reconciliation systems or integrated support for multiple transaction types. A new report on photocopying costs is available for some hotels.

Number of electronic invoices issued:

	2019	2020	2021	2022
Number invoices	68.857	23.455	27.106	48.925
%	-2,5%	-65,93%	13,46%	44,59%

The Group companies within the Environmental Management System are:

- Vincci Hotels S.A. (total billings year 40,892).
- Nexotel Adeje S.A. (total invoices year 3.203).
- Altai Gestión S.A. (total invoices year 1,697).
- Lusovincci Unipessoal LDA (total invoices year 3,133).

Sheets	2022 Perimeter Group
Consumption Sheets	4.100.500
Rooms	927.743
Ratio	4,42

Laundry	2022 Perimeter Group
Kilos laundry	4.790.349
Rooms	927.743
Ratio kilos/inhabitant	5,51

VEGETABLE OIL.

When it comes to recycling food oil, we have an authorised manager to transform it into biodiesel, thus providing an alternative to fossil fuels.

Sanitary regulations are in charge of setting the protocols for changing oil, which means a reduction in polluting discharges, less clogging of pipes and the spread of pests, and greater control of odours associated with its decomposition. In addition, this action facilitates the work of wastewater treatment plants.

These procedures in the kitchen are possible thanks to the involvement of our employees and their alignment with the Company's environmental commitments. The employees working in this scenario have received appropriate training and have participated in the environmental awareness campaigns organised by the chain.

3.3.2 Explain how the organisation manages recycling.

Waste	LER Code	Dangerous	Destination
Paper and Cardboard	20 01 01	No	Recycling
Organic	20 01 08	No	Compost
Undifferentiated	20 03 01	No	Recovery of % for recycling or composting. The remainder goes to landfill, in others to Valorisation or Biomethanisation
Glass	20 01 02	No	Recycling/ Re-use
Packaging	20 01 39 / 20 01 40	No	Recycling
Vegetable Oil	20 01 25	No	Recycling
WEEE	20 01 36	No	Recycling/ Re-use
Toners	08 03 18	No	Re-use
Batteries	16 06 04	No	Recycling
Pruning	20 02 01	No	Compost
Contaminated packaging	15 01 10	Yes	Recycling
Aerosols	16 05 04	Yes	Recycling
Rags and absorbents	15 02 02	Yes	Elimination
Fluorescent, energy-saving and LED	20 01 21	Yes	Recycling
Extra material	20 03 07	No	Recycling
WEEE	20 01 35	Yes	Recycling/ Re-use/ Disposal
Mineral Oil	13 02 05	Yes	Recycling
Batteries	16 06 01	Yes	Recycling
Paints and varnishes	08 01 11	Yes	Recycling

3.4

SUSTAINABLE USE OF RESOURCES

3.3.3 Explain how the organisation manages food waste.

The reduction of food waste means an improvement in waste management, an optimisation of production costs and an action against hunger as stated in SDG 1. The current levels of food waste in the world, as well as the rates of famine in many countries make this situation unsustainable and this must be one of our priority actions. That is why from 2023 we will start working on this issue, we will try to quantify by type of waste and its origin.

3.4.1 Explain how the organisation manages water consumption and supply.

RESOURCE CONSUMPTION.

Another of Vincci Hotels' priorities is the optimised consumption of resources. We keep our staff informed about this through manuals, good practice posters and internal communication campaigns. At the same time, we periodically review procedures in accordance with the calendar set out in our Maintenance Plan, which includes the daily, weekly and monthly work that takes place in our facilities.

Responsible and optimised consumption of resources is not only necessary in terms of savings, but also when it comes to reducing the environmental impact associated with our activity. The mission of the Works and Maintenance Department is to analyse the needs of each establishment in order to offer customised solutions, pointing out the measures that need to be adopted and the investment involved.

At Vincci Hotels we have established a cyclical monitoring, control and adjustment protocol that achieves optimum, efficient and sustainable control of the resources used and the facilities.

The Group companies within consumption are:

- Vincci Hoteles S.A.
- Nexotel Adeje S.A.
- Lusovincci Unipessoal LDA.
- Vincci Mediterraneé.

WATER

	2019	2020	2021	2022	2022 Perimeter Group
Water (m ³ /inhab.)	0,40	0,71	0,49	0,42	0,43
Water (m ³ /inhab.) Spain	0,55	0,54	0,44	0,39	0,41
Water (m ³ /inhab.) Portugal	0,29	0,30	0,26	0,29	0,29
Water (m ³ /inhab.) Tunisia	0,50	1,07	0,82	0,53	0,53

	2022 Perimeter Group
Water (m ³)	523.599,58
Water (m ³) Spain	339.675,33
Water (m ³) Portugal	29.144,25
Water (m ³) Tunisia	154.780,00

Water Footprint for the hotels: 0.268 m³ /pax for the Group's Perimeter hotels, the footprint for the hotels in Spain and Portugal 0.264m³ /pax (certified hotels and Vincci Selection Aleysa, Vincci Larios Diez, Vincci Valdecañas Golf, Vincci Zaragoza Zentro and Ramblas Hotel).

3.4.2 Explain how the organisation manages energy.

ELECTRICITY.

Most of the Group's establishments have a green energy supply contract with Endesa. The National Market and Competition Commission publishes the data on green energy supplied in April. In 2021 and 2022, the hotels with this supply obtained 100% green energy. The only hotel with photovoltaic panels is Vincci Porto, although some establishments have installed motion sensors in staff areas to achieve reductions in consumption.

ELECTRICITY

	2019	2020	2021	2022	2022 Perimeter Group
Electricity (kWh/inhab.)	20,95	35,08	28,96	22,99	22,67
Electricity (kWh/inhab.) Spain	25,54	38,48	29,18	24,69	24,44
Electricity (KWh/inhab.) Portugal	22,17	36,07	23,86	19,01	19,01
Electricity (KWh/inhab.) Tunisia	15,14	28,81	30,12	18,91	18,91

	2022 Perimeter Group
Electricity (kWh)	27.633.321,68
Electricity (kWh) Spain	20.206.487,13
Electricity (KWh) Portugal	1.921.608,55
Electricity (KWh) Tunisia	5.505.226,00

NATURAL GAS

	2019	2020	2021	2022	2022 Perimeter Group
Natural Gas (kWh/inhab.)	10,67	25,43	17,17	14,49	12,20
Natural Gas (kWh/inhab.) Spain	20,82	24,15	16,15	13,93	10,61
Natural Gas (KWh/inhab.) Portugal	16,11	33,58	15,93	11,04	11,04
Natural Gas (KWh/inhab.) Tunisia	1,42	25,35	21,58	16,13	16,13

	2022 Perimeter Group
Natural Gas (kWh)	14.587.922,04
Natural Gas (kWh) Spain	8.777.957,86
Natural Gas (KWh) Portugal	1.116.333,45
Natural Gas (KWh) Tunisia	4.693.630,73

PROPANE

	2019	2020	2021	2022	2022 Perimeter Group
Propane (kg/inhab.)	1,21	1,53	1,19	1,21	1,21
Propane (kg/inhab.) Spain	1,21	1,53	1,19	1,21	1,21
Propane (kg/inhab.) Portugal	There is none	There is none	There is none	There is none	There is none
Propane (kg/inhab.) Tunisia	There is none	There is none	There is none	There is none	There is none

	2022 Perimeter Group
Propane (kg)	220.688,15
Propane (kg) Spain	220.688,15
Propane (kg) Portugal	There is none
Propane (kg) Tunisia	There is none

A total of 11 hotels have solar thermal panels for DHW, there are also 17 hotels that have heat pumps and/or energy recuperators, 1 hotel with aerothermal energy and 1 hotel has micro cogeneration equipment. This equipment helps us to reduce the consumption of gas or propane, which means lower CO₂ emissions.

3.4.3 Energy consumption within the organisation.

In order to know the energy consumption data, the hotels take daily data from the meters, write them down and these are checked by the central offices.

Propane and Gas Conversion Factors:

- FC 1 kg Propane = 13,385 kWh
- FC Natural Gas = 11,70 kWh/m³

3.5 CLIMATE CHANGE

3.5.1 Explain how the organisation manages emissions.

EMISSIONS.

Good maintenance of the air conditioning installations in each of our establishments is one of Vincci Hotels' priorities. This preventive policy is in addition to the official analyses that are carried out periodically on pollutant sources.

We are aware that a badly adjusted boiler, for example, can increase consumption by up to 15%. That is why we make every effort to carry out correct maintenance work, as a key measure in the pollutant emissions management policy that is so important for our chain.

In addition, as an exercise in social responsibility, we regularly check our air-conditioning and refrigeration equipment as well as refrigerators and cold stores to prevent CFC or refrigerant gases from being released into the atmosphere, which would damage the ozone layer.

In 2022, the Greenhouse Gas Report was registered with MITECO (Ministry for the Ecological Transition and the demographic challenge) and an offset

was made on this registered Carbon Footprint.

The Carbon Footprint for hotels is 13.48 kg/inhabitant occupied (for all hotels in Spain and Portugal). For the Group's hotels 11.73 kg/inhabitant. It should be noted that the figure is not real because we have to wait until the National Market and Competition Commission (CNMC) publishes the data on green energy supplied to hotels. In previous years it was 100% for most hotels.

The environmental footprint is shown below for all hotels in Spain and Portugal (including those under management, outside the scope of consolidation).

Emissions included in each scope		Emissions
Scope 1	Combustion from stationary sources gas	2.419,85 tn CO ₂
	Combustion of stationary propane sources	2.064,70 tn CO ₂
	Refrigerant gases	384,12 tn CO ₂
	Transfer	15,89 tn CO ₂
Scope 2	Electricity consumption	5.138,26 tn CO ₂
Scope 3	Laundry	2.058,96 tn CO ₂
	Travel to headquarters	67,76 tn CO ₂
	Travel from head office for business purposes or to hotels	48,81 tn CO ₂
	Water consumption	59, 53 tn CO ₂
	Waste management	30,34 tn CO ₂

The environmental footprint for hotels exclusively within the Group's perimeter is shown below:

Emissions included in each scope		Emissions
Scope 1	Combustion from stationary sources gas ^{2.121} ,	2.975,96 tn CO ₂
	Combustion of stationary propane sources	1.941,42 tn CO ₂
	Refrigerant gases	345,43 tn CO ₂
	Transfer	15,89 tn CO ₂
Sc. 2	Electricity consumption	6.106,85 tn CO ₂
Scope 3	Laundry	1.876,34 tn CO ₂
	Travel to headquarters	67,76 tn CO ₂
	Travel from head office for business purposes or to hotels	48,81 tn CO ₂
	Water consumption	78,01 tn CO ₂
	Waste management	29,40 tn CO ₂

The carbon footprint is an environmental indicator that reflects the sum of all Greenhouse Gas (GHG) emissions that have been caused, directly or indirectly, by a person, company, product or event. It is expressed in units of carbon dioxide equivalent (CO₂ eq) and is the mark that each GHG-emitting activity leaves in the environment. Its calculation refers not only to the CO₂ emitted, but to all greenhouse gases that are responsible for global warming.

The reporting of carbon emissions by companies in the tourism sector has traditionally lacked consistency. Therefore, a proprietary calculator was created and is used for the verification of the carbon footprint. The 2021 footprint was verified by an external company, and the same will happen for the 2022 footprint in July 2023.

In 2022, a compensation of 0.66% of the verified footprint of 2021 was made.

Both carbon footprint and water footprint measurements are a further step in the environmental management policy which includes the following processes:

- Quantify, Reduce, Compensate, Raise Awareness

The Group companies within the Environmental Management System are:

- Vincci Hotels S.A.
- Nexotel Adeje S.A.
- Lusovincci Unipessoal LDA.

SDGs we contribute to:



SUSTAINABLE MOBILITY.

Although sustainable mobility criteria call for less use of private vehicles and less use of oil as a source of energy, the number of vehicles in the fleet continues to grow. This makes it more difficult to achieve a lower impact on the environment in order to achieve the goal of a more sustainable planet.

Our chain supports the use of bicycles as a means of transport, as it is considered a simple, healthy, silent and ecological vehicle, which promotes an original and fun way of getting to know the environment where our hotel establishments are located. For this reason, some hotels have bicycles available for hire and others recommend shops specialising in this type of rental near the hotels.

Our agreement with Tesla and Porsche has allowed us to install electric charging points in our facilities. If our guests do not have a charger, our professionals will guide you to the electric charging points closest to the hotel (this information is also available to guests on our Sustainability site). Likewise, our staff also provides information on the different public transport options so that our visitors can easily reach the main tourist attractions.

In 2021, the installation of chargers in several hotels was signed with Endesa.

3.6 PROTECTION OF *BIODIVERSITY*

3.5.2 Specific actions on emissions.

The CO₂ Reduction Plan includes objectives and actions to be implemented in order to achieve the objectives, such as: switching to green energy for the entire chain, promoting sustainable mobility, changing minibars, etc.

3.6.1 Explain how the organisation manages biodiversity.

BIODIVERSITY.

Two of the chain's hotels are located within ZEPA (Special Protection Area for Birds) zones: Vincci Selection Rumaykiyya (Sierra Nevada) and Vincci Costa Golf (Cádiz Bay). Both are certified by Environment and, aware of the area where they are located, they do not stay open all year round, which helps to reduce tourist pressure on this special bird area.

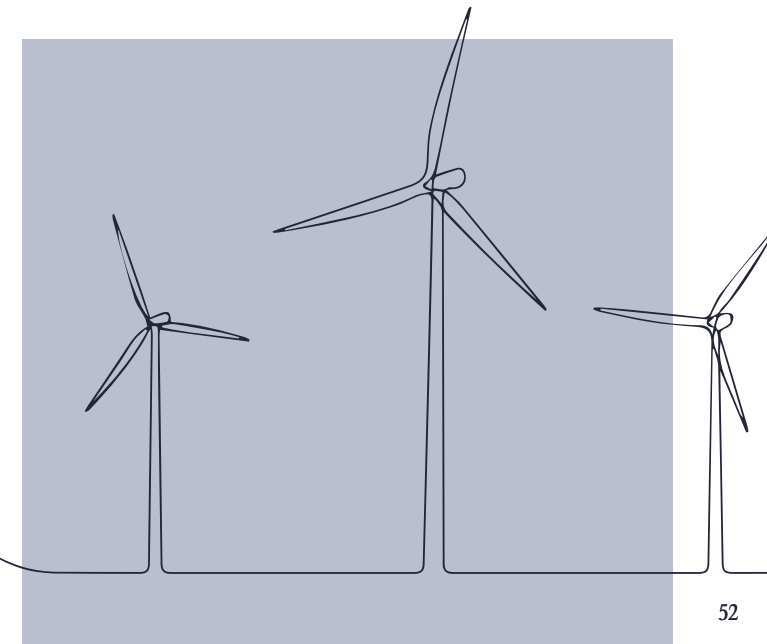
Vincci Selection Rumaykiyya is located in a Spanish National and Natural Park, in an area with threatened flora and a SCI zone. Vincci Costa Golf, for its part, is located within the Sancti Petri Natural Area and Marsh.

In the hotels of Tenerife the action on the Cory's Shearwater has been carried out during October 2022, the action consisted in dimming the lights of the hotels, thus avoiding the birds to be dazzled and giving training in case any bird fell inside the hotels.

There are no environmental provisions and guarantees in 2022.

Specific actions such as processes, projects, programmes and initiatives of the organisation for the protection of biodiversity.

In 2022, part of the 2021 footprint has been compensated with Bosques Sostenibles (Sustainable Forests) in the project to restore a burnt forest in Iruela Valley.





04.

HUMAN CAPITAL

4.1 Staff profile

4.2 Work organisation

4.3 Health and Safety

4.4 Training

4.5 Equality

4.1 *STAFF* PROFILE

4.1.1 Proportion of senior executives recruited from the local community.

As at 31 December 2022, the 13 members of the Group's senior management are located at the head office, at the street Anabel Segura 11 build. A, ground floor 28108 Alcobendas (Madrid).

4.2 *WORK* ORGANISATION

4.2.1 Explain how the organisation manages employment.

HOW WE WORK AT VINCCI.

The aim of Vincci Hotels is to ensure that our clients are completely satisfied, meeting and exceeding their expectations and making their stay a unique experience through a meticulous and impeccable service.

Our team is perfectly aligned with the Group's philosophy and faces the daily work with dedication, talent and enthusiasm. It is the effort of our more than 2,089 professionals (1,571 in Spain; 182 in Portugal and 336 in Tunisia as of 31 December 2022) that makes us a hotel benchmark and an added value for all the customers who choose us.

Only a few jobs were kept in ERTE by COVID-19 in the first quarter, with the Company's normal activity recovering during the rest of 2022.

On the other hand, the Company has maintained the teleworking options that began to be applied in the wake of the pandemic and for those positions where the activity allows.

Professionalism and experience

The real driving force behind Vincci Hotels is its employees, who are our most steadfast commitment. In recognition of their daily efforts, we seek to promote their professional careers throughout their working lives, through a highly effective opportunity management model. In this way we project the careers of our employees and attract the best talent in the sector to work at the hotels of our chain.

To this end, we maintain collaboration agreements with universities, training centres, professional forums and business schools, who make joint efforts to enable our employees to develop their skills and abilities, and thus maintain their motivation to offer the best service to customers.

Our employees work in a safe working environment, protected by an effective occupational risk prevention policy and a commitment to continuous training throughout their working lives. In this way, we not only manage to strengthen their leadership, empathy and active listening skills, but we also consolidate our brand and the sustainability of our team.

We also maintain a responsible business model with an effective human resources policy, which throughout our history has become an element that defines us and shows the way forward so that our human resources team adopts the values that we have maintained throughout our history.

Aware that all our actions have a real impact on the lives of our employees, we want to continue maintaining a two-way dialogue with our workers, characterised by fluidity, honesty and transparency. We listen to their needs and offer them the best solution in a policy where trust is the aspect that allows us to retain talent in order to achieve job stability and offer real possibilities for career advancement and a real work-life balance.

At the Spanish work centres, both full-time employees (88.03% of the workforce) and part-time employees (11.97%) enjoy the same social benefits and rights. Salaries are established by agreement, regardless of gender, while working conditions are protected by the current regulatory framework and framed in a collective bargaining agreement, which covers 100% of our employees.

Attention to diversity

At the Vincci Group we offer our employees the chance to settle in a leading and rapidly expanding group in the hotel and catering sector.

We are convinced that only through rigorous attention to diversity and optimal talent management will we achieve the goals we have set ourselves. 0.76% of our employees have some kind of disability, a decision that, beyond compliance

with current regulations, has become a policy of support for diversity. This philosophy includes collaboration with social organisations and contracting the services of Special Employment Centres, which have a minimum percentage of 70% of disabled workers on their staff.

Thus, we are committed to compliance with the General Law on Disability and we support organisations that work with this group, such as the Illunion Laundry and Alquitex Renting Textil S.L.

The objective of Vincci Hotels is to offer a motivating work environment and stable employment which, together with the development of new technologies, will enable us to achieve our growth objectives. Our Group does not currently have a Diversity Management policy.

TABLE OF EMPLOYEES.

Vincci Hotels faces the challenge of offering its employees stable, quality employment in the best possible working conditions, whether the functions are carried out in our hotel establishments or at our head offices.

In 2022, 531 recruitment processes were carried out in Spain. 95, in Portugal, managed both in the hotels themselves and through the Human Resources department at our head offices.

The total number of employees in the Group as at 31 December 2022 is as follows:

2.089 professionals

1.571 in Spain

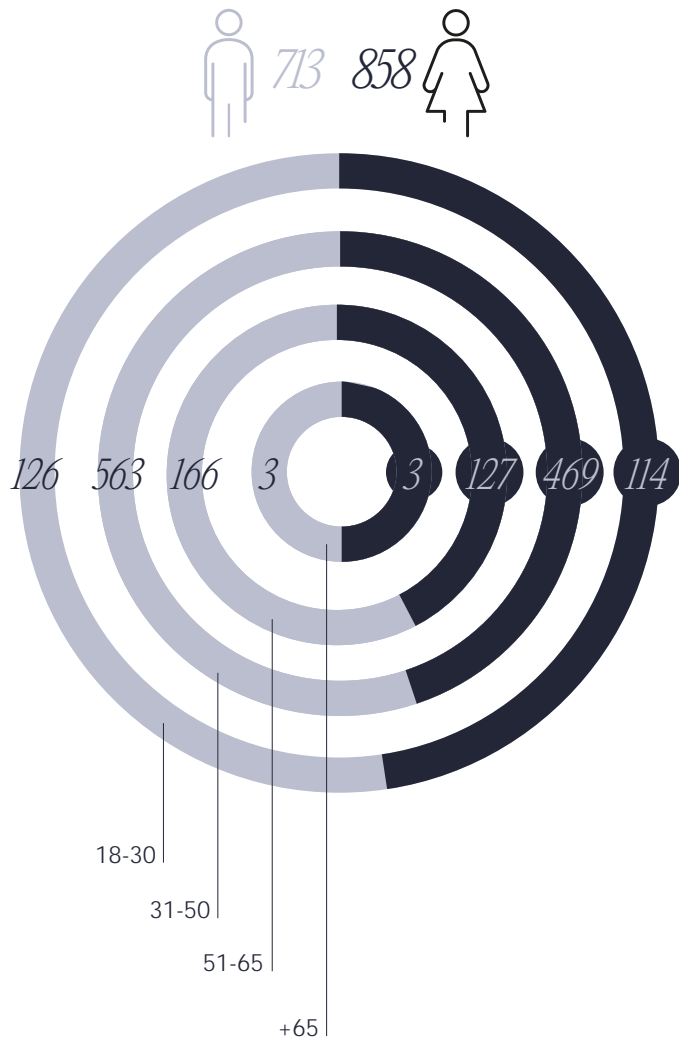
182 in Portugal

336 in Tunisia

(as of 31 December 2022)

TOTAL NUMBER AND DISTRIBUTION OF EMPLOYEES BY GENDER, AGE, COUNTRY AND OCCUPATIONAL CLASSIFICATION 2022

SPAIN



Employees per Category			
	Men	Women	Total
Top Management	9	4	13
Hotel Management	31	24	55
Technical, Administrative and Sales Staff	23	88	111
Middle Management	138	141	279
Other staff	512	601	1.113

1.571 employees
in Spain

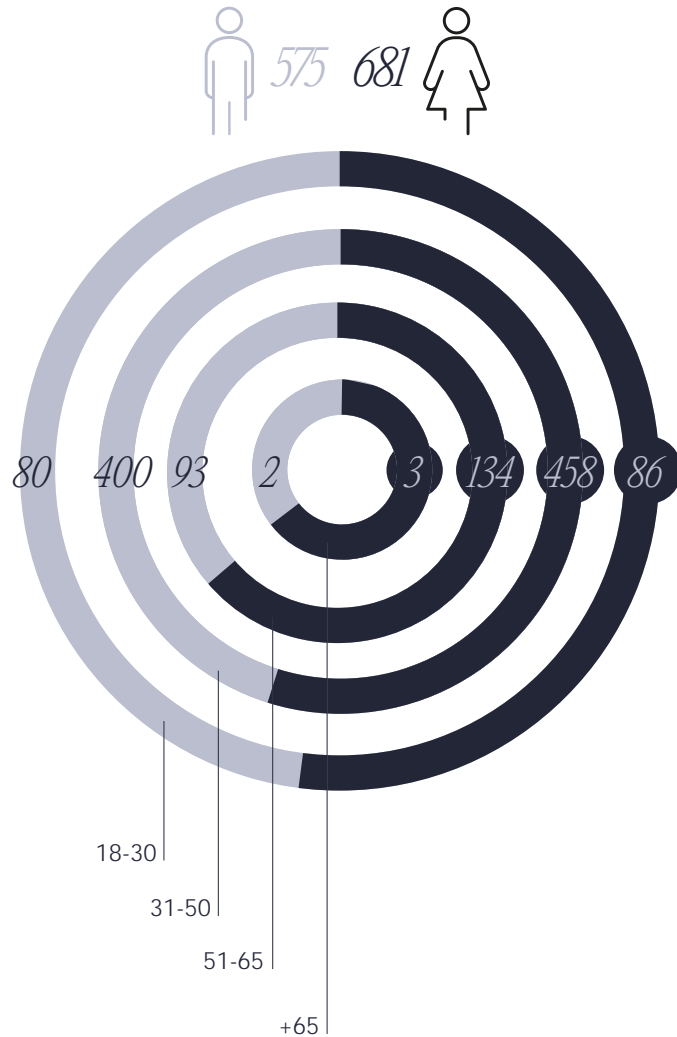
(as of 31 December 2022)

Remuneration per gender, wage gap, age and occupational category 2022

Remuneration per Age				Gap
	Men	Women	Total	
18-30	12.686	13.529	13.120	-7%
31-50	20.612	19.588	20.048	5%
51-65	25.160	20.602	22.555	18%
66-100	51.902	20.174	36.038	61%
Remuneration per Category				
Top Management	102.238	85.320	97.032	17%
Directors	45.618	38.679	42.607	15%
Middle Management	24.846	23.444	24.134	6%
Other staff	15.803	15.753	15.776	0%
Technical, Administrative and Sales Staff	24.667	24.906	24.857	-1%

REMUNERATION BY GENDER, AGE AND OCCUPATIONAL CATEGORY 2021

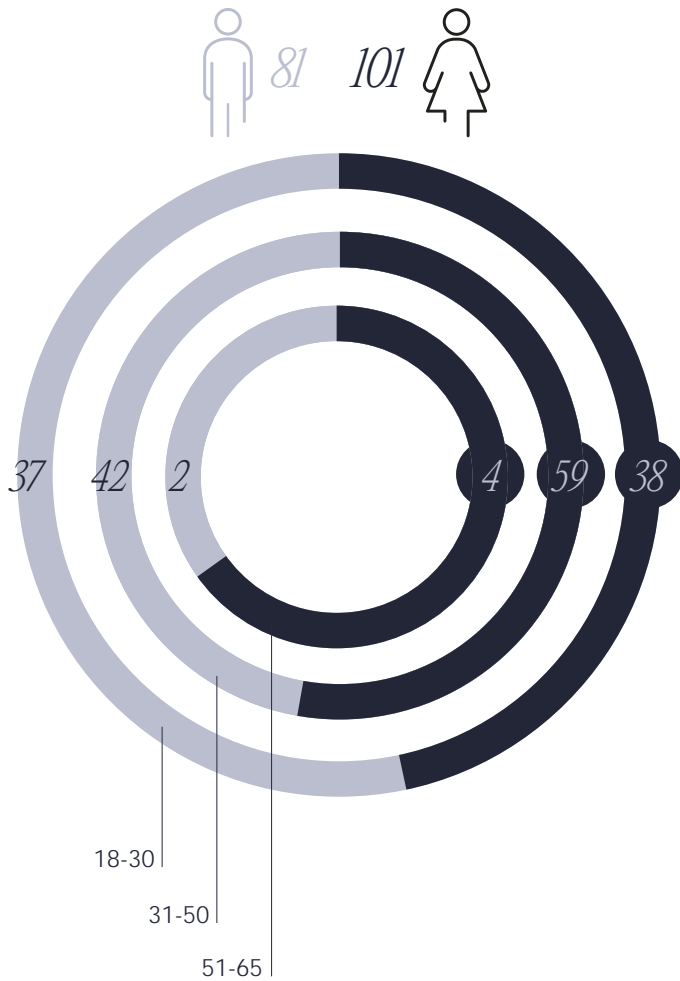
SPAIN



Average SALARY		Gender		
RANGE	DIVISION CAT.	Men	Women	Grand total
18-30	Management and Director	32.888	32.442	32.442
	Middle Management	27.207	26.719	26.719
	Other Staff	17.432	16.965	16.965
	Technical, Administrative and Sales Staff	-	24.786	24.786
Total 18-30		17.870	17.660	17.761
31-50	Management and Director	57.403	57.009	57.275
	Middle Management	26.266	24.226	25.504
	Other Staff	19.049	19.246	19.160
	Technical, Administrative and Sales Staff	31.215	25.546	26.916
Total 31-50		24.364	22.006	23.105
51-65	Management and Director	94.267	74.184	88.529
	Middle Management	31.999	28.509	30.533
	Other Staff	20.385	19.583	19.847
	Technical, Administrative and Sales Staff	31.745	29.559	30.340
Total 51-65		32.561	23.282	27.084
66-100	Management and Director	119.377		119.377
	Other Staff	25.906	19.020	21.315
	Technical, Administrative and Sales Staff		61.790	61.790
Total 66-100		72.642	33.276	49.022
Grand total		24.954	21.758	23.221

TOTAL NUMBER AND DISTRIBUTION OF EMPLOYEES BY GENDER, AGE, COUNTRY AND OCCUPATIONAL CLASSIFICATION 2022

PORTUGAL



Employees per Category			
	Men	Women	Total
Top Management	-	-	-
Hotel Management	4	7	11
Technical, Administrative and Sales Staff	3	6	9
Middle Management	5	5	10
Other staff	69	83	152

Remuneration per gender, wage gap, age and occupational category 2022

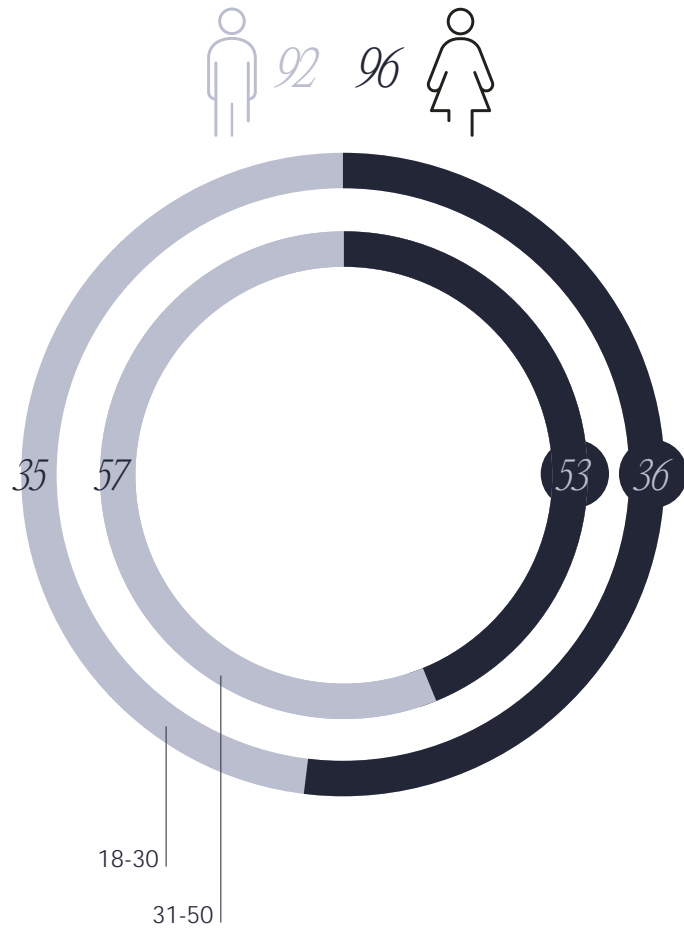
Remuneration per Age				Gap
	Men	Women	Total	
18-30	13.212	12.799	13.003	3%
31-50	20.334	17.192	18.498	15%
51-65	12.810	11.729	12.089	8%
Remuneration per Category				
Director	47.194	33.725	38.623	29%
Middle Management	31.024	21.111	26.067	32%
Other Staff	14.093	12.738	13.353	10%
Technical, Administrative and Sales Staff	17.407	24.781	22.323	-42%

182 employees
in Portugal

(as of 31 December 2022)

REMUNERATION BY GENDER, AGE AND OCCUPATIONAL CATEGORY 2021

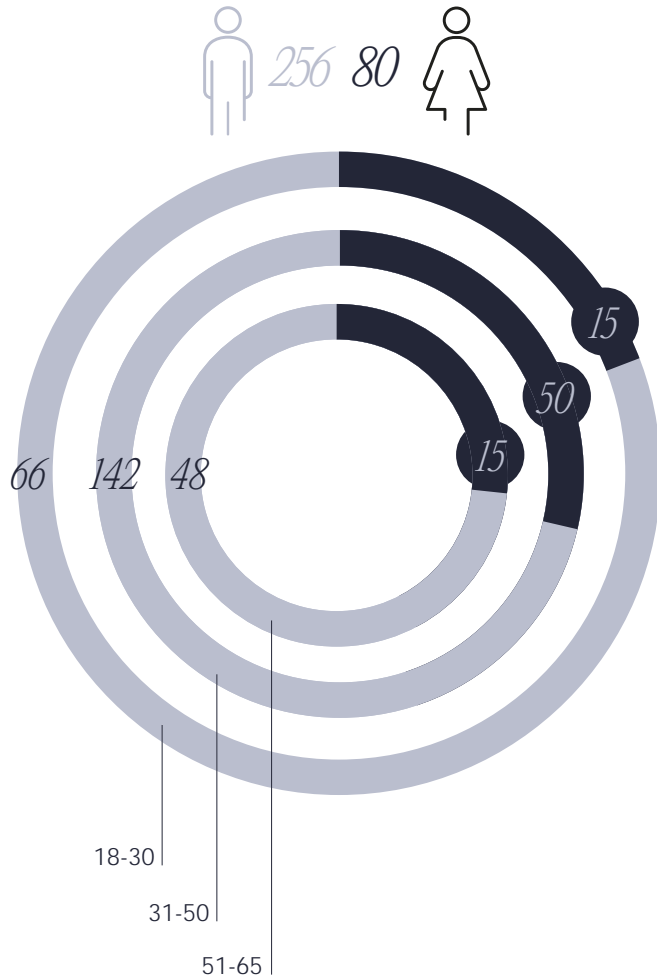
PORTUGAL



Average SALARY		Gender		
RANGE	DIVISION CAT.	Men	Women	Grand total
18-30	Management and Director	32.888	32.442	32.442
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	Other Staff	17.432	16.965	16.965
	Technical, Administrative and Sales Staff	-	24.786	24.786
Total 18-30		17.870	17.660	17.761
31-50	Management and Director	57.403	57.009	57.275
	Middle Management	26.266	24.226	25.504
	Other Staff	19.049	19.246	19.160
	Technical, Administrative and Sales Staff	31.215	25.546	26.916
Total 31-50		24.364	22.006	23.105
51-65	Management and Director	94.267	74.184	88.529
	Middle Management	31.999	28.509	30.533
	Other Staff	20.385	19.583	19.847
	Technical, Administrative and Sales Staff	31.745	29.559	30.340
Total 51-65		32.561	23.282	27.084
66-100	Management and Director	119.377		119.377
	Other Staff	25.906	19.020	21.315
	Technical, Administrative and Sales Staff		61.790	61.790
Total 66-100		72.642	33.276	49.022
Grand total		24.954	21.758	23.221

TOTAL NUMBER AND DISTRIBUTION OF EMPLOYEES BY GENDER, AGE, COUNTRY AND OCCUPATIONAL CLASSIFICATION 2022

TUNISIA



Employees per Category			
	Men	Women	Total
Management and Directors	17	2	19
Middle Management	25	5	30
Other staff	178	63	241
Technical, Administrative and Sales Staff	36	10	46

Remuneration per gender, wage gap, age and occupational category 2022

Remuneration per Age				Gap
	Men	Women	Total	
18-30	7.994	9.762	8.321	-22%
31-50	11.917	8.794	11.104	26%
51-65	13.907	7.227	12.317	48%
Remuneration per Category				
Director	29.839	17.340	28.523	42%
Middle Management	12.470	10.561	12.152	15%
Other Staff	8.506	8.009	8.376	6%
Technical, Administrative and Sales Staff	15.397	10.248	14.278	33%

336 employees in Tunisia

(as of 31 December 2022)

TOTAL NUMBER AND DISTRIBUTION OF TYPES OF CONTRACT:

SPAIN

Average Employees per Type of Contract per Age Group and Gender:

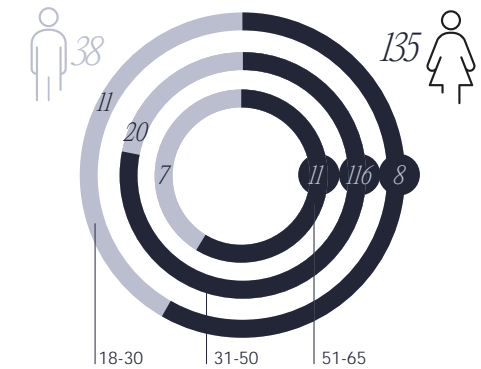
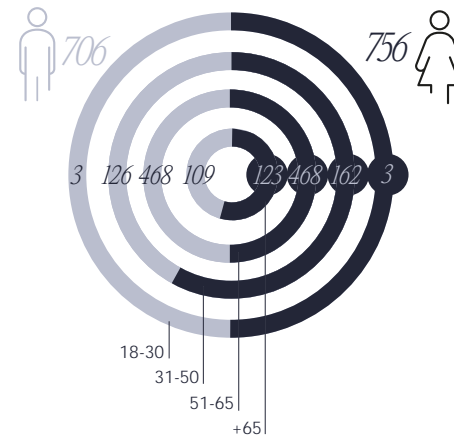
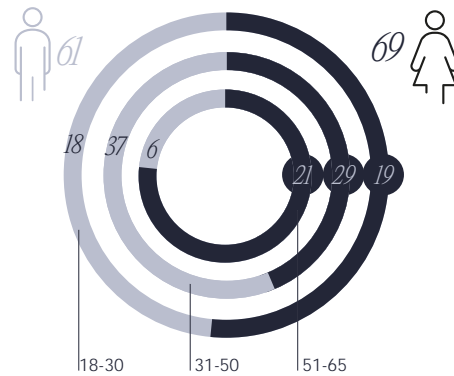
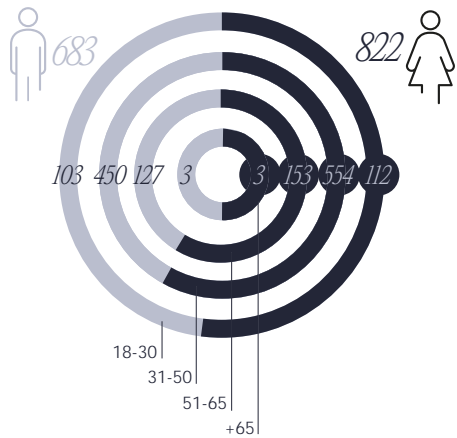
Average Employees per Type of Workday per Age Group and Gender:

PERMANENT

TEMPORARY

FULL TIME

PART TIME



Average employees per Type of Contract per Professional Category:

Average employees per Type of Workday per Professional Category:

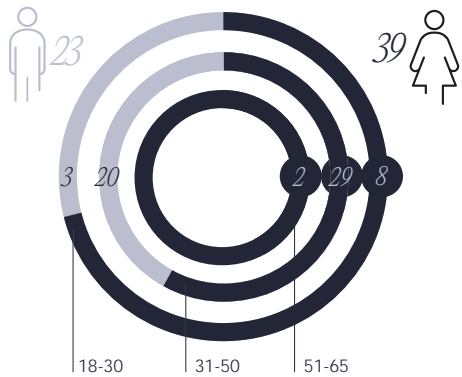
	Permanent		Temporary		Total	Full Time		Part Time		Total
	Men	Women	Men	Women		Men	Women	Men	Women	
Top Management	9	5	-	-	14	8	4	1	1	14
Directors	31	24	1	-	56	32	24	-	-	56
Middle Management	136	139	3	2	281	140	130	-	11	281
Other staff	483	566	57	65	1.170	502	526	37	105	1.170
Technical, Administrative and Sales Staff	24	88	-	2	114	24	72	-	18	114

TOTAL NUMBER AND DISTRIBUTION OF TYPES OF CONTRACT:

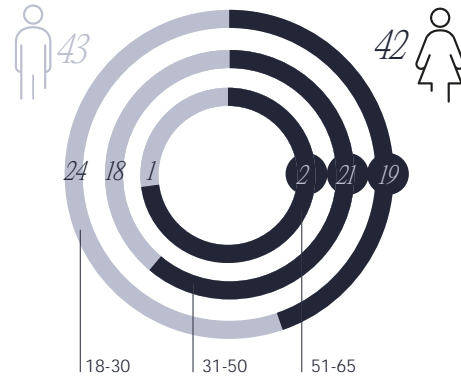
PORTUGAL

Average Employees per Type of Contract per Age Group and Gender:

PERMANENT

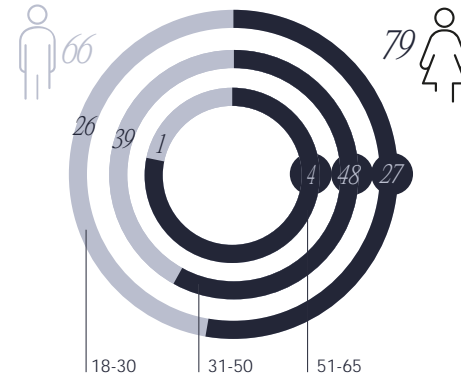


TEMPORARY

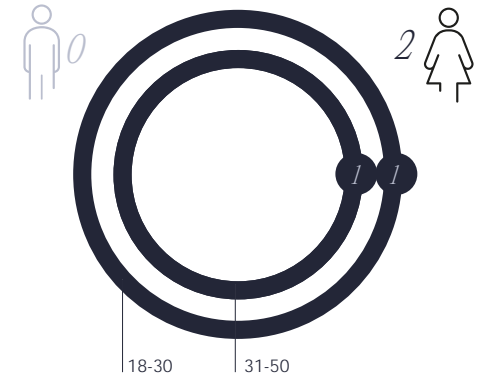


Average Employees per Type of Workday per Age Group and Gender:

FULL TIME



PART TIME



Average employees per Type of Contract per Professional Category:

Average employees per Type of Workday per Professional Category:

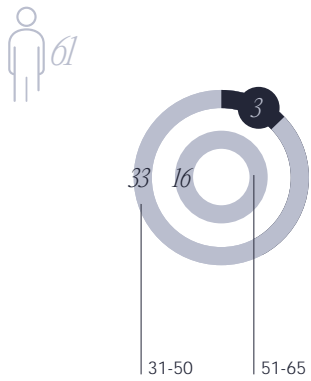
	Permanent		Temporary		Total	Full Time		Part Time		Total
	Men	Women	Men	Women		Men	Women	Men	Women	
Directors	3	6	1	1	11	4	7	-	-	11
Middle Management	2	3	3	2	10	5	5	-	-	10
Other staff	17	25	38	38	118	55	61	-	2	118
Technical, Administrative and Sales Staff	1	5	1	1	8	2	6	-	-	8

TOTAL NUMBER AND DISTRIBUTION OF TYPES OF CONTRACT:

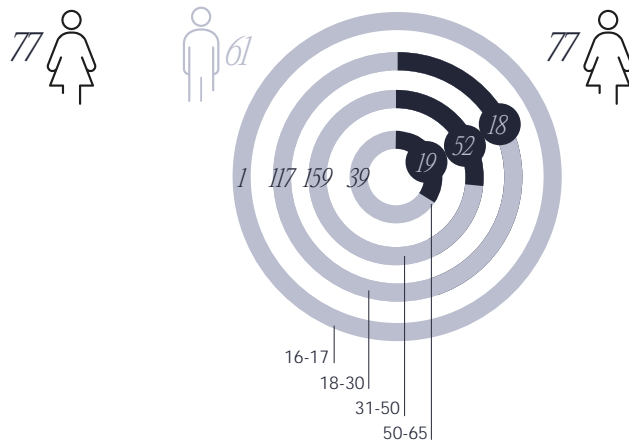
TUNISIA

Average Employees per Type of Contract per Age Group and Gender:

PERMANENT

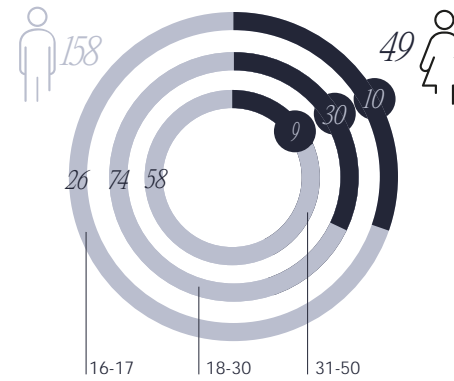


TEMPORARY

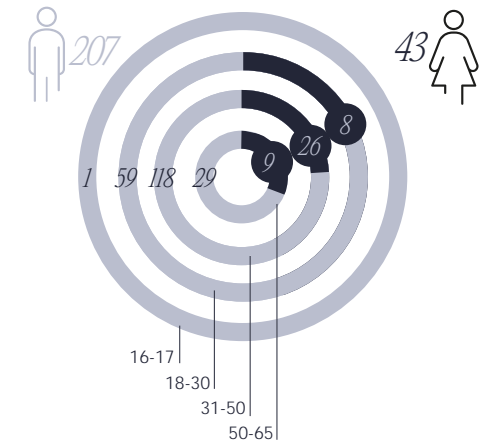


Average Employees per Type of Workday per Age Group and Gender:

FULL TIME



PART TIME



Average employees per Type of Contract per Professional Category:

Average employees per Type of Workday per Professional Category:

	Permanent		Temporary		Total	Full Time		Part Time		Total
	Men	Women	Men	Women		Men	Women	Men	Women	
Directors	13	2	4	-	19	7	1	9	1	18
Middle Management	9	-	17	4	30	14	2	12	2	30
Other staff	8	-	265	77	350	127	41	146	36	350
Technical, Administrative and Sales Staff	19	1	30	8	58	10	5	40	4	59

DISMISSALS

Spain

Indicator	Men	Women	Total
Age groups			
Between 18-30	6	2	8
Between 31-50	8	7	15
Between 51-65	2	1	3
Categories			
Director	-	-	-
Technical, Administrative and Sales Staff	-	1	1
Middle Management	-	-	-
Other staff	16	9	25
Total	16	10	26

Portugal

No redundancies have taken place in Portugal during the financial year 2022.

Tunisia

Indicator	Men	Women	Total
Age groups			
18-30	1	1	2
31-50	1	1	2
Categories			
Middle Management	1	1	2
Other staff	1	1	2

BENEFITS FOR OUR EMPLOYEES.

Our professionals, as well as their families and friends, benefit from certain conditions that the chain puts at their service, including interesting discounts and an exclusive reservation policy in the establishments.

Vincci Family Classic

Its use is open to the family of our employees, regardless of the degree of consanguinity maintained with the employee.

Vincci Family Premium

It represents a special discount of 20% on any rate published on the website. Our employees can benefit from a reservation at advantageous prices, provided that there are rooms available in their establishments. To make them effective, the booking will be made through the booking link created for this purpose and accessible through the operational Intranet.

Vincci Family Friends

Special rate for friends and acquaintances of the employee. By booking through the appropriate link, interested parties can obtain a 15% discount on any rate available on the website.

In addition to these advantages, our employees can also benefit from advantageous conditions related to leisure, free time, finance and insur-

ance, thanks to the agreements between Vincci Hotels and certain providers such as Seguros Asisa and Europcar. In this sense, Nationale Nederlander offers a free personalised advice service and Gestival grants the best prices to our employees.

All discounts are listed in the “premium benefits” section of the employee portal (Nivimu).

WELCOME PACK.

When professionals joins Vincci Hotels, they receive a Welcome Pack on their first day at work, with the aim of giving them easy access to the Group’s strategic information and any other information that may be of interest to them in relation to their job and the department where they will carry out their duties. The documentation provided to the new employee includes the Occupational Risk Prevention, the Quality and Environment Policy and the Company’s Code of Ethics.

In order to reduce the amount of paper consumption as much as possible, and in line with our environmental commitment, this information is provided on a corporate flash drive.

SDGs we contribute to:



INTRANET.

We want to provide a concrete response to the

needs of our employees. For this reason, the Group has created new sections, which are responsible for showing what’s new at Vincci Hotels and act as a complement to the usual information channels, in addition to the personal consultation sections that exist on the Employee Portal.

In order to achieve coherence with our environmental commitment and the challenge of controlling waste generation, Vincci Hotels encourages the chain’s different establishments to make public the materials they do not use, with the aim of being able to reuse them in other hotels in the group. This measure of reusing usable materials is part of the waste control policy, as well as representing a saving for the chain and, more importantly, a clear environmental benefit.

The information on the Intranet is organised by department and geographical area, in order to achieve greater employee involvement in the Company’s global objectives. The different departments update their content on a regular basis, which means that interested employees can access up-to-date information, in an efficient and intuitive search experience typical of a flexible platform.

EMPLOYEE PORTAL.

The Intranet and the Employee Portal aim to provide regular updates in order to make human resources management and the flow of information more effective and dynamic, while improving and maintaining internal communication and

reducing the bureaucratic and administrative burden of this department.

We seek to implement procedures that achieve greater efficiency in work processes and that the employee is even more involved in the development of their functions. The system of one file per employee improves daily communication and achieves more efficient procedures.

As part of our commitment to sustainability, the Employee Portal allows our professionals to request their holidays, access their pay slip and have it sent to them by e-mail, or view their training, among other things. With the implementation of these services, paper consumption is reduced, a responsible measure that is part of the objectives of Vincci Hotels’ resource saving policy.

SDGs we contribute to:



PERFORMANCE ASSESSMENT.

Evaluating the performance of our employees is of the utmost interest for the development of effective Human Resources management. Actions aimed at new employees acquire added value, as knowing their level of adaptation to their colleagues, to their superiors and to the position in which they carry out their work are key for the professional to feel comfortable and offer the best of themselves day after day.

When the employee is going to sign the permanent contract, the degree of compliance with certain aspects of their position, including knowledge, quality, autonomy, quantity and teamwork, is indicated through the document "Employee assessment form". Based on this assessment, the appropriate decisions are made.

Human Resources is the department responsible for analysing those aspects of interest that may affect the work of new employees, such as the identification of the competencies developed from the moment of their incorporation to the position, as well as any aspect related to the treatment received by the organisation, the working environment or the working conditions, and always with strict respect for the privacy of the employee, who is guaranteed anonymity in the assessments carried out.

In addition, the Human Resources department carries out the calculation of the turnover rate, another of the measurement variables with respect to its employees. This measure of human capital management makes it possible to identify job dissatisfaction among professionals and deficiencies in the selection and recruitment processes. At Vincci Hotels we have an optimal staff turnover rate, below the average for the CNAE 55 of the sector (National Classification of Economic Activities) (26.3%), which makes us proud, as it shows that our professionals are comfortable in their jobs, which translates into greater productivity and a better working environment. In 2022, in Spain, the turnover rate was 12.52%.

Staff turnover rate = (Number of departures - Number of hires / Total number of employees) x 100

IRP: $((680-1.022)/2.089)*100 = 16.37\%$.

When making decisions, Vincci Hotels takes into account the results of these analyses. In order to establish the appropriate measures to promote daily work in each of our hotels, it is necessary to have a complete knowledge of the teams and their activities, in addition to the importance of ensuring that the workers who join our Group are properly welcomed and adapted.

SDGs we contribute to:



VINCCI GO!

Vincci Go! is an internal mobility programme aimed at managing human capital that was created as a voluntary initiative by employees with a clear interest in personal development. It helps employees to avoid possible typecasting and offers a response to those who are motivated to fill possible internal vacancies.

Through a wide range of constantly evolving opportunities, the programme aims to enable our employees to achieve the full development of their personal skills and abilities, growing in a company with a promising future and continuous growth since its beginning.

Vincci Go! not only makes it possible to fill vacancies as they arise, but is also an opportunity for workers who want to improve their job prospects, thus avoiding the need to recruit professionals externally. In this way there is a cross-flow of knowledge between the chain's different departments and establishments, while at the same time offering the worker a personalised response to their interest in personal and professional improvement.

With this internal mobility option, employees enrich their professional profile without the need for the change to be subject to a promotion or an increase in responsibilities. However, for the programme to develop as planned, it needs to be supported by continuous training, which is key to the success of the employee's professional life.

The Vincci Go! programme provides professionals interested in changing their professional life with a proactive way out of a process that begins with an initial contact with the Human Resources department, through the application set up for this purpose on the Intranet.

Two types of mobility are possible. Horizontal mobility, which occurs when the worker applies for a vacancy with functions that correspond to the same professional group as the job held until then, and vertical mobility, which can be upward if a higher category position is desired, or downward if a lower category is chosen. An example of vertical mobility can be found in the case of assistant managers and managers who once started an internship programme at Vincci Hotels and who

now take on positions of responsibility. In 2022, Vincci Hotels has offered 12 cases of internal promotion in relation to these positions and has made public 13 mobility offers for its employees.

SDGs we contribute to:



EMPLOYMENT NEWS IN THE ORGANISATION.

In 2022 the new Vincci Hotels employee portal started to be developed. This tool had 3 fundamental objectives:

- Modernisation and digitisation of HR processes (paper 0, digital signature of HR documentation and digital document repository).
- Direct communication with the employee through the tool (communications, employee requests, follow-up).

- Shift and clocking control from the application and incident reporting to HR for payroll.

By 2022, the 3 initial and fundamental objectives have been achieved.

To these we add the implementation of a company incentive policy and system managed through this employee portal tool.

4.3 HEALTH AND SAFETY

4.3.1 Explain how the organisation manages health and safety.

PREVENTION OF OCCUPATIONAL HAZARDS.

One of Vincci Hotels' commitments is to reduce occupational risks as far as possible and to create a safe working environment. We are in permanent contact with workers who are on sick leave due to illness or common accidents, and we offer them advance medical tests in order to achieve an early and accurate diagnosis of their illness or injury, and thus shorten their convalescence time.

Corporate Health and Safety Policy

Our action protocols are focused on the continuous improvement of health and safety-oriented areas, both in the chain's establishments and at the head office.

Our corporate policy includes defining the roles of each department and worker in matters of prevention, and the dissemination of the measures in all centres so that all workers have

access to them, are aware of them, understand them and internalise them, actively participating in their application and improvement.

Our ultimate aim is to minimise any risk that may affect both workers and facilities or any element associated with the Company. To this end, we establish the necessary measures not only to comply with legislation, but also, one step further up the chain, to guarantee a management system that effectively protects the health and safety of our professionals and collaborators.

These are the objectives of our integrated prevention model, as part of our occupational health and safety policy:

- Avoid risks and thoroughly analyse those that could not be avoided.
- Continuous training in prevention, with a personalised Training Plan for each worker.
- Combat risks according to their origin.
- Priority attention to the psycho-physical conditions of each employee in order to assign him/her to the optimal position.
- Update on the latest security developments on the market.
- Replacement of all elements considered to be hazardous with a substitute that poses less or no risk.
- Putting collective protection before individual protection

Occupational Risk Prevention Plan

The Vincci Hotels Occupational Risk Prevention Plan is the basis of the Company's prevention policy. This document, whose ultimate aim is to safeguard the safety of the organisation, promotes a preventive policy with a list of objective and priority principles.

SDGs we contribute to:



Joint Prevention Service

The Joint Prevention Service is the optimal preventive modality for Vincci Hotels and Nexotel, according to the criteria of the Company's Health and Safety Committees. For Lusovincci there is a contract with an external company and in Tunisia it is not compulsory.

4.3.2 Number of accidents at work.

In relation to accidents at work, there were 178 in Spain in 2022, 103 women and 75 men.

INCIDENCE RATE (I.I.)	ALL AC WITH MINOR SICK LEAVE VINCCI + NEXOTEL
<p>It represents the number of accidents with sick leave that occur per thousand workers employed in the company. It therefore informs us of the number per thousand of workers who are injured in a given period.</p>	
	62,38064927
<p>Its calculation is:</p>	
I.I.=	$\frac{\text{No. of accidents} \times 1000}{\text{No. of workers}}$

Accidents in **Portugal**: 13 (6 Women and 7 Men). All accidents in Portugal are considered minor.

No information has been received about occupational accidents in **Tunisia** during 2022.

4.3.3 Absenteeism.

ABSENTEEISM AND CAUSES.

We seek to provide our employees with a safe working environment, addressing their specific needs, while promoting gender equality policies, catering to diversity and striving for a real work-life balance. The causes of absenteeism among our employees in 2022 include the following:

Absenteeism data for **Spain** are shown below:

	Days
Accident at work sick leave	3.626
Accident at work without sick leave	81
Non-occupational accident	1.326
Common illness	35.644
Unjustified	102
Maternity	2.361
Paternity	2.561
Pregnancy risk	920
Suspension of employment salary	95
Total	46.716

Absenteeism in **Portugal**:

	Absenteeism
Total absence days	2.218
Total absence hours	17.740

The incidence rate in Portugal is 71.43

Absenteeism in **Tunisia**:

	Days
Unjustified absence days	421
Accident days	106
Days accident relapse	-
Sick days	274
Days of relapse due to illness	-
Days of Birth leave (birth mother)	120
Days of Birth leave (other parent)	-
Pregnancy risk days	-
Days of suspension	-
Strike days	-
Total absenteeism	921

No occupational illnesses occurred in the financial year 2022.

4.4 TRAINING

4.4.1 Explain how the organisation manages training and education.

TRAINING MANAGEMENT.

The management model of Vincci Hotels aims to develop each professional career, promoting training throughout the working life of its employees. Receiving the right training allows each employee to give the best of themselves. In this sense, training per areas means reaching a greater number of employees, as there are techniques necessary for the development of certain positions and it favours the general growth of the department. Depending on the needs detected by the heads of the departments or the managers of the establishments, an email is sent to the personnel in charge of training in Human Resources, who is responsible for its management.

The three fundamental pillars to ensure the best possible customer service are refreshing knowledge, professional recycling and learning new skills. Internal and external training is key in any job, both specific training, which is key for a specific position, and transversal training, which is useful for

the entire workforce of the chain.

At Vincci Hotels we are convinced that training is the most direct and effective way to maintain the standards of quality and high levels of competitiveness that characterise our Group. It is a key tool for our employees to acquire competencies and skills, and to train professionally with a view to the correct performance of their duties and the adjustment of their profile to their job position.

Likewise, our professionals can request the training they need or that they consider appropriate for a better performance of their activity. The Human Resources department studies all the requests received in order to offer the best possibility among all the existing ones.

During 2022, we have returned to normality in terms of subject matter and delivery of training courses.

Our online training portal

We have our own online training platform, which is very useful for employees who have a working day divided into shifts. This e-learning tool's great added value lies in its flexibility. It allows autonomous learning whenever the employee requires it,

as well as it offers unbeatable results, that is why it is highly valued by workers, who find the following advantages in this solution:

- Flexibility 24x7x365 when accessing content.
- Connection anywhere, anytime.
- Improving work-life balance.
- Immediate and permanent updating of content.
- Personalised training and individual monitoring of each process.
- Possibility of virtual meetings and virtual meetings.
- Permanent access to discussion forums for the exchange of ideas, practices and knowledge, which is a mutual enrichment between the centres of the chain.

Training hours Spain 2022:

Professional categories	Training hours
Managers and Directors	2.545
Middle Management	8.604
Other staff	3.571
Technical, administrative and sales staff	2.482
Gender division	
Men	7.344
Women	9.858
TOTAL	17.202

Training hours Portugal 2022:

Professional categories	Training hours
Sales	2
Directors and heads of department	27
Other staff	115
Gender division	
Men	75
Women	69
TOTAL	144

Training Hours	Hours
Invoicing training	16
Bar Training	10
HR Training	2
Customer training - HACCP	18
Internal Security Plan - Self-Protection Measures	87
Caixa Procedures	11

No training has been provided in Tunisia during 2022.

INTERNSHIP PROGRAMME.

The Vincci Hotels internship programme is an opportunity for the chain to attract qualified talent right from the start of their working lives, for those people interested in working in the Group. For this reason we maintain different collaboration agreements with universities and schools, which facilitate professional access to young recent graduates to an interesting internship training programme.

This internship programme is one of the initiatives that Vincci Hotels is proud to undertake and one of the main formulas for recruiting staff. Year after year, numerous students place their trust and their expectations for the future in the chain as a stepping stone to international success and with the commitment to grow professionally within our organisation.

In 2022, a total of 92 people, from 40 centres, participated in different internship training programmes in 12 different departments of the Company in Spain.

The future of Vincci Hotels depends on the talent and preparation of these young people who are beginning a working life marked by their commitment to the quality standards of our organisation. Those who join our chain through an internship programme have the opportunity to participate, once they have completed their training period, in the organisation's processes of evaluation and selection of staff.

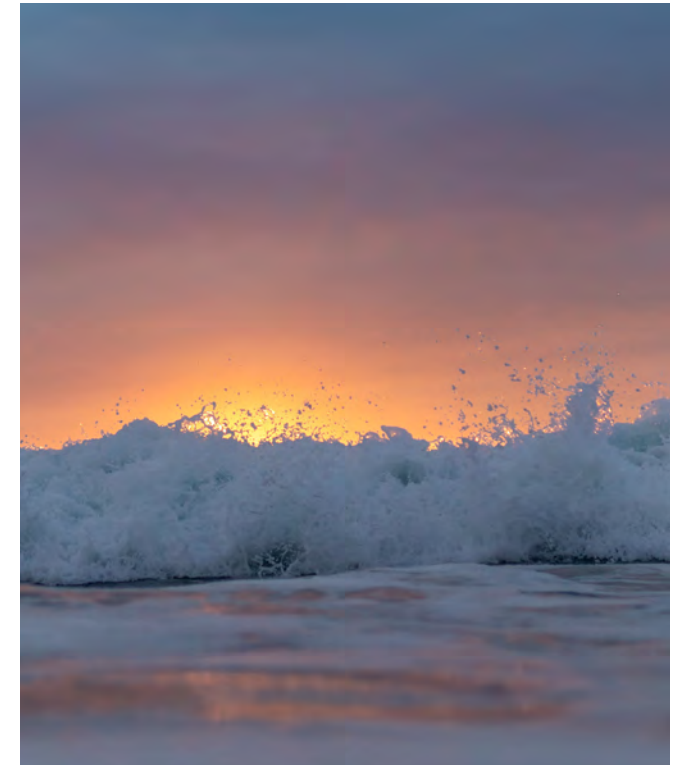
At Vincci Hotels we are committed to the internal values of those workers who have started their

professional careers in our chain and have grown alongside the company. These professionals have adopted the group's values and have the training, knowledge, optimism and enthusiasm that we seek in our teams.

Partnership agreements

Vincci Hotels' agreements with schools and universities include those with the Centro Superior de Hostelería de Galicia (Galicia Hostelry College), the Escuela Superior de Hostelería de Sevilla (Seville Hostelry College), Rey Juan Carlos University and Seville University, among others.

SDGs we contribute to:



4.5 EQUALITY

4.5.1 Explain how the organisation manages diversity and equal opportunities and non-discrimination.

EQUALITY PLAN.

The main objective of the Vincci Hotels Equality Plan (2022) is to respect the real and effective equality of all our workers. These measures have been agreed between the Group and the different trade union representatives, and organised into different thematic areas of action, including the following:

- Effective defense of equality between men and women, guaranteeing the same job opportunities for entry and professional development for all workers, regardless of their sex and status.
- Balanced representation of women in the workplace.
- Promotion of women who, on the basis of their personal value, gain access to positions of responsibility, reducing potential imbalances of cultural, social or family origin.

- Human resources management in accordance with current legislation on equal opportunities.
- Prevention of discrimination based on sex in the workplace and establishment of an action protocol for those cases there is evidence of.
- Firm commitment to Corporate Social Responsibility with the ultimate aim of improving the quality of life of all employees and their families.

In order to achieve these objectives, the following processes take place:

- Selection, promotion and professional development.
- Training.
- Reconciliation.
- Organisation of working time.
- Specific measures to prevent sexual harassment. In this regard, there is an action protocol for the prevention of sexual, moral and gender-based harassment. This protocol defines how to act in order to report, both directly and through another person or entity (trade unions). Workers

are made aware of it through the information in the Welcome Pack and it is also available in the workplaces for anyone interested. Going a step further, training courses have been started and the measures have been included in the code of ethics.

- Evaluation and monitoring of actions

There is no follow-up of the Plan, so in 2023 the diagnosis of Vincci Hotels and Nexotel is being carried out together with Randstad, and an attempt will be made to include Lusovincci and Mediterraneé.

SDGs we contribute to:



UNIVERSAL ACCESSIBILITY.

Universal Accessibility and Design is synonymous with equal opportunities, as reflected in the United Nations Convention on the Rights of Persons with Disabilities (New York, December 2006). Article

04 HUMAN CAPITAL

9 addresses, as a fundamental issue, the identification and elimination of obstacles and access barriers that persons with disabilities may have in accessing their physical environment, facilities, transportation, public services and information and communication technologies on an equal basis.

In order to achieve this equality, Vincci Hotels has rooms adapted for people with disabilities, in accordance with the regulations. This legal requirement is strictly complied with in our establishments, through measures such as accessible bathrooms, room size or elements arranged at different heights, among others. Our establishments are accessible for all those people who want to stay, eat, attend a meeting or event, or simply for those who come to the hotel to visit our facilities, whatever the reason for doing so.





05.

SOCIAL CAPITAL

5.1 Human Rights

5.2 Company Commitments to Sustainable Development

5.3 Subcontracting and Suppliers

5.4 Consumers

5.1 *HUMAN RIGHTS*

5.1.1 Explain how the organisation manages human rights assessment.

Protocol adopted by the organisation on human rights assessment.

No human rights assessment was made in 2022, the chain adheres to the Code of Ethics of the World Tourism Organisation.

5.1.2 Explain how the organisation manages forced or compulsory labour.

There is no forced or compulsory labour in the chain, all labour rights regulations are respected and complied with in all countries where we are located.

5.2 *COMPANY COMMITMENTS TO SUSTAINABLE DEVELOPMENT*

5.2.1 Explain how the organisation manages local communities and indirect economic impacts.

CSR MASTER PLAN 2021-2030.

The new CSR Master Plan 2021-2030 has new goals and interventions, always in line with the global objectives approved in 2015 by the UN in the 2030 Agenda for Sustainable Development.

The CSR Master Plan 2021-2030 has nine-year objectives, so the actions will be evaluated once we have completed their monitoring. This Plan contains objectives related to employees, environmental and social aspects.

COMMITMENT TO THE COMMUNITY .

Vincci Hotels is a Group integrated into a local community, which translates into the need to improve the places where our hotels are located. This challenge implies a policy of joint efforts aimed at improving the social environment, capable of generating economic development opportunities

for the local community. In this sense, the chain employs local people in its establishments, which contributes to enriching the place where the hotel is located. At the same time, the opening of the establishment brings with it a flow of customers, who consume in the businesses close to the establishment, which contributes to the development or improvement of the area. At the same time, the client is offered the possibility of interacting with and learning from the population and enjoying its culture, gastronomy and places of interest.

Vincci Hotels collaborates with local associations, supporting the actions proposed by these organisations, and there are several agreements made directly with the hotels. Other actions, however, are aimed at donating material or food, or providing space. The goal is to be part of the environment where we are located, integrating, helping, collaborating and favouring its community.

Vincci Hotels' objectives in this respect include the following:

Respect: integration into social life, through actions that promote support for the culture, rules and

conservation of the environment where our establishments are located.

Dialogue: collaboration with the local community and the social agents involved in it, with the aim of knowing their real needs and contributing to their progress through ethical and responsible behaviour. This dialogue is based on direct communication between the community and the hotel, with no established protocol or frequency, but according to the needs of both parties.

Consumption of local products: in order to strengthen the economic and social development of a community, we are committed to local products, provided that quality, price, health and safety standards are guaranteed.

Recruitment of local staff: this employment policy enriches work teams, which are strengthened through the cultural diversity of their employees, and promotes wealth in the area.

Social investment: collaboration with social entities after the corresponding analysis and assessment of applications, in a process that invites participation.

5.2.2 List of stakeholders.

OUR PARTNERSHIPS.

Since its beginnings in 2001, Vincci Hotels has been aware of the social, economic and cultural reality of its surroundings, which has allowed close and permanent collaboration with institutions, organisations and entities focused on satisfying the needs of the groups located in the places where its hotels are located.

This commitment, in line with our Corporate Social Policy, is linked to each of our establishments and the Group itself, and makes us consider every year the collaboration with local initiatives that involve an improvement in the quality of life of the people who most need our support.

“TAPONES PARA UNA NUEVA VIDA”® (“PLASTIC CAPS FOR A NEW LIFE”)- SEUR FOUNDATION

The “Caps for a new life” initiative encompasses a voluntary, supportive, active and transparent movement that was launched in 2001, with goals that are perfectly in line with our Group’s strategic and social approach. Its mission is to enable underprivileged children to have access to the orthopaedic devices and medical treatment they need. In this sense, the initiative aims to raise awareness among companies, institutions and the general public to participate in actions with immediate environmental and social benefits.

This solidarity action has the collaboration of Seur, the company in charge of transporting the caps to the logistics centres, where they are delivered to the recycler in a process of absolute transparency.

All our hotels in Spain collaborate with Seur Foundation as part of our objective to help groups at risk of social exclusion. In Tenerife, the caps are recycled on the island itself for logistical reasons and to avoid harmful emissions into the environment. Seur, in line with the actions included in the concept of ecological awareness, transports the bottle caps in vehicles that are obliged to make the journeys for professional reasons.

With this collaboration, Vincci Hotels demonstrates the possibility of carrying out a humanitarian action with a minimum of effort. The funds received are destined to different social actions, highlighting that, with a simple gesture, such as keeping a plastic bottle cap instead of throwing it away, great things can be achieved.

This simple recycling action also prevents the caps from reaching nature, which is particularly interesting considering that they would take more than half a century to degrade. In this way, we are also helping to curb plastic manufacturing and fuel extraction, while at the same time contributing to the production of materials made from recycled plastic. This means less waste of energy and raw materials, and a reduction in waste and pollutant emissions.

In 2022, the collection of bottle caps, both in our central offices and in all our Spanish hotels, reached 225,000 caps, which is a source of pride for all the professionals who form part of the chain, given the common commitment we undertake in unison.

SDGs we contribute to:



SOCIAL INTEGRATION AND ENVIRONMENT - ATARETACO FOUNDATION

The main goal of the Ataretaco Foundation over the last 30 years has been to support groups at risk

of exclusion through actions focused on training and social and occupational integration of the groups that need it most. The initiative proposes, based on activities related to the recovery and recycling of waste, an economy of solidarity and environmental protection, which leads the fight for equal opportunities.

As part of its commitment to quality, the Foundation has implemented an Integrated Management System focused on the continuous improvement and efficiency of those who work for and with the environment. Our hotels in Tenerife collaborate with the Ataretaco initiative and jointly manage waste. In addition, training and awareness-raising sessions on sustainable and waste management are held at our hotels' facilities.

Throughout 2022, Vincci Selection La Plantación del Sur and Vincci Tenerife Golf have collected, among others, the following waste: urban waste, paints, weee, batteries, oil, toners, contaminated packaging.

SDGs we contribute to:



CHILDREN'S VILLAGES

The SOS Children's Villages organisation aims to help one of the most vulnerable groups, such as children, which is perfectly in line with the social policy followed by our chain. Our hotels offer guests who are checking out the possibility of making a

donation of one euro. The money raised will be donated to the villages that the institution has in Spain, and the funds will be used so that children and young people can enjoy a family environment where they can receive training, affection and the necessary care.

In addition, collaboration with Children's Villages also includes training processes for young people under the organisation's supervision, which take place at our hotel facilities. This training includes the possibility for the young people to become part of the Vincci Hotels staff and join our team of professionals in the future.

Money raised for Children's Villages in 2022 in hotels: €4,775.26.

Money raised for Children's Villages in 2022 through employee payrolls: €5,756.59.

SDGs we contribute to:



OTHER DONATIONS

- **Vincci Selection Aleysa, donation of € 2,310.93 to Unicef**
- **Vincci Selection Aleysa has donated money to the El Pimpi Foundation of 750€.**

- **Vincci Via66 has donated kitchen equipment to the Manos de Ayuda Association**

5.2.3 Membership of associations.

CODE OF ETHICS OF THE WORLD TOURISM ORGANISATION.

In 2018 we signed the Global Code of Ethics for Tourism, which is the framework for sustainable and responsible tourism. Its main purpose is to help maximise the benefits of the sector, while minimising potential negative impacts on the environment, cultural heritage and society at large.

These principles, which were adopted in 1999 by the General Assembly of the World Tourism Organisation, were recognised two years later by the United Nations, which encouraged the promotion of actual compliance with the provisions. The code, designed to provide guidance to governments, tourism businesses, communities and tourists themselves, is not legally binding, but incorporates a voluntary enforcement mechanism through its recognition of the role of the World Committee on Tourism Ethics, to which parties can refer any questions concerning the application and interpretation of the document.

The ten articles of the code deal with the economic, social, cultural and environmental components of travel and tourism in general. They are as follows:

- Article 1: Contribution of tourism to understanding and mutual respect between men and societies.
- Article 2: Tourism as an instrument of personal and collective development.
- Article 3: Tourism as a factor of sustainable development.
- Article 4: Tourism as a factor of exploitation and enrichment of the cultural heritage of humanity.
- Article 5: Tourism as a beneficial activity for destination countries and communities.
- Article 6: Obligations of tourism development stakeholders.
- Article 7: Right to tourism.
- Article 8: Freedom of tourist travel.
- Article 9: Rights of workers and employers in the tourism sector.
- Article 10: Application of the principles of the Global Code of Ethics for Tourism.

Vincci Hotels has not received any complaint for the violation of human rights. Consequently, no complaint has been received from any official body.

Affiliations with tourism organisations

VINCCI MARITIME	Gremi d'Hotels de Barcelona
VINCCI MAE	
VINCCI GALA	
VINCCI BAIXA	Hotelaria de Portugal (Portugal Hostelry)
VINCCI LIBERDADE	
VINCCI PALACE	Valencia Tourism
VINCCI MERCAT	
VINCCI SELECTION LA PLANTACIÓN SUR	Hotel and Extra-Hotel Association of Tenerife, La Palma, La Gomera and El Hierro (Ashotel)
VINCCI TENERIFE GOLF	
VINCCI COSTA GOLF	Federation of the Hotel and Catering Industry of the Province of Cádiz (Horeca)
VINCCI LA RÁBIDA	Seville Hotel Association (AHS)
VINCCI FRONTAURA	Valladolid Hotel Association (AHV)
VINCCI SELECTION ESTRELLA DEL MAR	Association of Hotel Businessmen of the Costa del Sol (Aehcos)
VINCCI MÁLAGA	
VINCCI SELECTION POSADA DEL PATIO	
VINCCI ALEYSÁ	Salamanca Hotel and Catering Association
VINCCI SALAMANCA	
VINCCI ALBAYZÍN	Federation of Hotel, Catering and Tourism Businesses of Granada
VINCCI PORTO	Associação Portuguesa de Hotelaria Restauração e Turismo (APHORT)
VINCCI ZENTRO ZARAGOZA	Federation of Hotel and Catering Businesses of Zaragoza (Horeca)
VINCCI CONSULADO DE BILBAO	Destino Bilbao Hotel Association

5.3 SUBCONTRACTING AND SUPPLIERS

5.3.1 Supply chain.

Description of the organisation's supply chain, including the main elements related to the organisation's activities, main brands, products and services.

Vincci Hotels has centralised the authorization or no authorization of a supplier, this is due to the fact that there are many suppliers with national coverage. For local suppliers, this process is carried out by the hotel, but with the confirmation of the Purchasing department.

This department contracts the laundries that provide services to the hotels, including Illunion and Carsan, for example.

Vincci Hotels currently works together with the cleaning subcontractors to review the chemical products that are going to be used in the hotel and thus approve them or not, as well as some of the utensils that are recommended for use during cleaning.

5.4 CONSUMERS

5.4.1 Explain how the organisation manages customer health and safety, marketing and labelling, and customer privacy.

QUALITY, EXPERIENCE AND CULTURE OF DETAIL.

The aim of Vincci Hotels is to offer our customers the best experience and a personalised, close service. Only by getting closer to their needs can we offer an unbeatable service, with the quality that characterises us, and thus exceed all the expectations they have placed in us.

Our service must be geared towards excellence and a zero-error policy. This is the challenge we face every day and the one that deserves all our efforts, regardless of the position we hold. Our common vocation is customer satisfaction and this commitment also includes the permanent review of our procedures. Service is an added value that defines and differentiates our Company from other hotel groups, positioning us as a tourist reference.

The Marketing and Commercialisation area sees

its efforts recognised with the loyalty of those customers who find a service that exceeds their expectations, within a policy that works in detail and an experiential quality that is based on the following concepts:

- As opposed to price, added value.
- In the face of product standardisation, differentiating elements.
- As opposed to volume, business profitability.

In a business reality as complex as the one currently experienced by the tourism sector, consolidating and becoming a benchmark inevitably involves providing added value. Hotel prices tend to equalise over the years, which is why quality is what makes a hotel establishment stand out, making the client choose a particular hotel or hotel group. What makes the difference nowadays and makes a product appealing is the increase in the satisfaction indexes of each client.

The daily work and effort of our employees is the key that allows us to meet the challenges we face and improve the levels of excellence we

have already achieved. Their enthusiasm is the driving force that allows us to move forward and set increasingly ambitious goals, with the confidence to offer a service adapted to each of the needs of the people who visit us. We do not seek to solve problems during the course of a stay, but to detect and solve possible problems even before they appear, which translates into an optimal and efficient performance of our tasks.

In order to maintain its quality levels, Vincci Hotels establishes exhaustive risk assessment and management systems that are reflected in internal and external audits, periodic health and hygiene controls, and the management of all procedures related to the food chain. And all of this under a rigorous risk prevention policy that guarantees the most suitable for each client.

Audits

At least once a year, we performed an internal audit of procedures, carried out by our staff or persons reporting to our organisation. The objective is to obtain certification of the management system and, at the same time, to identify possible discrepancies with the terms of the 14001 standard. This internal audit complements the external audits carried out by specialised companies.

The Group companies within the Environmental Management System are:

- Vincci Hoteles, S.A. (Vincci Bit, Gala, Mae, Capitol, Centrum, Soho, Soma, The Mint, Via66, Lys, Mercat, Palace, Málaga, Selection Posada del Patio, Selection Estrella del Mar, La Rábida, Costa Golf, Albayzin, Selection Rumaykiyya, Frontaura, Puertochico, Tenerife Golf, Consu-

lado de Bilbao and Vincci Marítimo).

- Nexotel Adeje S.A. (Vincci Selection La Plantación del Sur).
- Lusovincci Unipessoal LDA (Vincci Baixa, Vincci Liberdade, Vincci Porto, Vincci Ponte de Ferro).

Other hotels outside the Groups perimeter, but within the environmental certification: Gehosal La Salle (Vincci Ciudad de Salamanca) and Sahara Pacífico SLU (Vincci Málaga).

On the other hand, there are other audits that guarantee compliance with the internal requirements set by Vincci Hotels and by current regulations in terms of quality, economic-financial procedures, and those referring to food safety, occupational risk prevention, LOPD (Law on the protection of personal data) and the environment.

The audits performed cover all the areas, protocols and procedures carried out, in addition to hygiene and good practices in the workplace, and the different environmental aspects regulated by legislation. In this way, we are able to detect potential deficiencies in a simple, fast and effective way. This is the most efficient way of being able to establish the corrective and preventive measures necessary to achieve the levels of excellence that have characterised our Group since its foundation.

On the other hand, and with the aim of certifying that our Environmental Management System complies with internal and legal requirements, some of our hotels located in Tenerife and Andalusia are certified by Travelife, thus ensuring that the

procedures used are focused on sustainability. The hotels that hold the Gold Seal are Vincci Selection La Plantación del Sur, Vincci Tenerife Golf, Vincci Selection Posada del Patio, Vincci Selection Estrella del Mar and Vincci Costa Golf. In 2022, the results of the Travelife audits were positive as all hotels achieved Travelife Gold certification, the highest award.

For their part, the Vincci Selection Posada del Patio and Vincci Málaga hotels have the SICTED (Integral System of Spanish Tourist Quality in Destinations) label, promoted by the Secretary of State for Tourism with the aim of improving the quality standards of tourist destinations. All the hotels continue with the certification.

Our customers are the true protagonists and the focus of Vincci Hotels' efforts. Day after day we make every effort to maintain direct contact and fluid communication in order to be aware of their expectations and thus be able to offer a personalised and efficient service that is the best option for their needs.

SDGs we contribute to:



Health and hygiene controls

Thanks to health and hygiene controls, which include analyses in swimming pools, water for human consumption and the disinfection of cisterns, we can eliminate any procedure or potential risk factor for the health of our clients

and workers. When any deficiency is detected, a file is opened and the most appropriate corrective measures are first applied, followed by preventive measures, which means that the incident disappears and, at the same time, does not recur.

HACCP

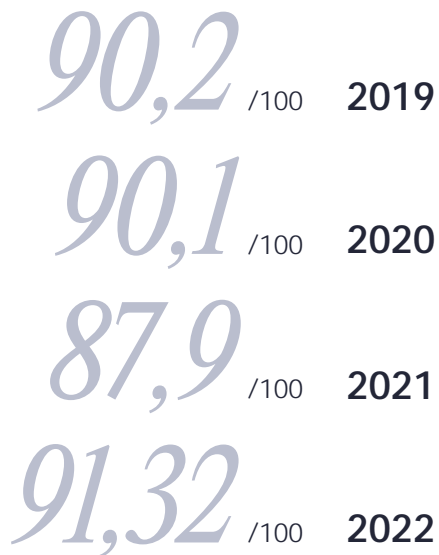
The commitment to quality established by Vincci Hotels implies the complete safety of the food and catering services in each of our hotels, which is achieved through exhaustive control of the entire food chain and a rigorous analysis of critical points.

Control begins with the process of implementing a system focused on good hygiene practices, which is completed with a specific cleaning and disinfection programme and pest controls, as well as food traceability and reception, temperature control and the approval of the suppliers we collaborate with.

The machinery, work tools, surfaces and chambers are constantly checked to confirm that they comply with the established protocol. We are also concerned to ensure that the entire food chain complies with current legislation in terms of the organoleptic properties of the food, the state and condition of the packaging, and the most appropriate temperature and transport conditions.

With all this we ensure that the food reaches our customers in the best possible condition.

According to the results of the audits conducted on Hazard Analysis and Critical Control Points (HACCP), our establishments have an average score of 91/100, an increase of 1.6 points over the previous year (89.7/100).



OUR CLIENTS

During 2022, our chain has accommodated guests of more than 170 different nationalities.

We listen and respond

Only through active listening do we know what our customers require and what they think. This allows us to meet their demands and improve day by day, which is why we establish open channels so that two-way communication is permanent.

We need to know what their experience has been like, and what their tastes and preferences are as a first step towards achieving their complete satisfaction. This personalised attention is a differentiating element that has made Vincci Hotels a benchmark in the tourism sector and the added

value that will allow it to continue growing.

The communication channels are permanently open to facilitate contact with our customers. This simple act of transparency allows us to manage in a simple, fast and efficient way any query, suggestion, doubt, complaint or claim. We are committed to ensuring that no comment that reaches us goes unanswered.

Corporate online customer satisfaction survey

The analysis of our customers' satisfaction levels begins by studying the results of online surveys. These data, included in a policy of active listening, allow us to make the necessary changes and adjustments, aimed at continuous improvement and achieving the desired quality standards.

Nowadays, the quickest and most effective way for customers to give us their opinion is through the online satisfaction surveys they receive by e-mail after their stay in our establishments. In this way, the customer can answer our questions in their native language, giving us their impressions quickly and efficiently, and from the comfort of their own home.

In any case, Vincci Hotels also provides MICE surveys in paper or electronic format, once the group has finished the session. Another channel of direct communication with the clients is an app as an alternative method for carrying out surveys.

SDGs we contribute to:



REVIEWPRO: ONLINE REPUTATION TOOL

Number of questionnaires	2019	2020	2021	2022	2022 Perimeter Group
Post Stay Survey	25.274	9.922	12.318	26.647	23.928
nAmmu survey	6	-	-	-	-
MICE survey	106	21	46	101	93
Pre Stay Survey	-	-	-	6.728	6.187
In Stay Survey	-	-	-	11.323	10.807

Group	2019	2020	2021	2022*	2022 Perimeter Group
Number of opinions	69.532	32.385	57.241	69.377	58.958
Number of mentions	256.794	97.272	158.090	223.871	194.059
Would you recommend the hotel?	88	96	92	87	87

*All hotels including managed hotels except for Vincci Marillia

05 SOCIAL CAPITAL

The incorporation of interactivity in the consultations with our customers makes it possible for their opinions to be easily disseminated, reaching high levels of impact under the criteria of transparency offered by social networks. These procedures are in line with the criteria of honesty that characterise the chain.

At Vincci Hotels we have an unbeatable online analysis tool that allows us to instantly find out what comments are posted on the Internet about our establishments. In this way we can immediately implement the necessary improvement processes, which has a direct impact on increasing customer satisfaction. On the other hand, this direct contact with the opinion of our customers allows us to know the positioning of our competition and thus establish the appropriate adjustments to continue as a benchmark in the sector.

The figures analysed show that we maintain high levels of customer satisfaction in the aspects identified. Our overall chain rating continues to increase year on year, reaching 87.6% in 2022.

SDGs we contribute to:



Indicator	2019	2020*	2021*	2022*	2022 Group Perimeter
Global Chain Index	88,10%	87,10%	87,50%	87,60%	87,30%
Cleaning	89,40%	89,70%	91,10%	90,40%	90,70%
Location	88,60%	89,80%	91,20%	91,10%	91,60%
Reception	-	-	-	-	-
Service	88,70%	90,30%	91,50%	91,20%	91,90%
Room	86,80%	89,8%	91%	89,90%	90,40%
Value for money	82,50%	85,10%	85,90%	83,80%	83%
Gastronomy	77,70%	82%	89,10%	82,70%	82,10%
Entertainment	71,60%	76,80%	88,90%	75,10%	75,10%

*All hotels including managed hotels except Vincci Marillia

COMMUNICATION WITH OUR STAKEHOLDERS.

The Marketing and Communications department attends to the media that contact Vincci Hotels, trying to provide them at all times with the best service and attention tailored to their interests and needs.

Our aim is to maintain a transparent, fluid and continuous dialogue with both national and international media, and especially with the local media in the different locations where our hotels are located. All of them receive information from Vincci Hotels through press releases and invitations to the events we hold periodically at our establishments.

Microsite: Vincci Sustainable & Responsible

As part of our commitment to establish transparent, honest and regular communication with all our stakeholders, the new Vincci Sustainable & Responsible microsite has been created, which can be accessed via www.vinccihoteles.com. It is a renewed space, with its own logo, which contains information of interest.

Transmitting to all interested people everything related to our sustainable actions is not only useful, but also necessary. Vincci Sustainable & Responsible responds to the interest of offering information in the quickest, most convenient and accessible way. It is a public space that details the Group's environmental philosophy and the working procedures used for this purpose, as part of the chain's commitment to global development and a sustainable planet.

Year after year, our Sustainability Report is published in this space, complemented by the chain's environmental objectives, indicators and awards obtained, which are made public for anyone interested.

With a pleasant and intuitive design that invites reading and dialogue, Vincci Sustainable & Responsible presents a layout in line with the Sustainability Report. Its access menus include detailed information about the work carried out by the chain in terms of sustainability, in all areas of action.

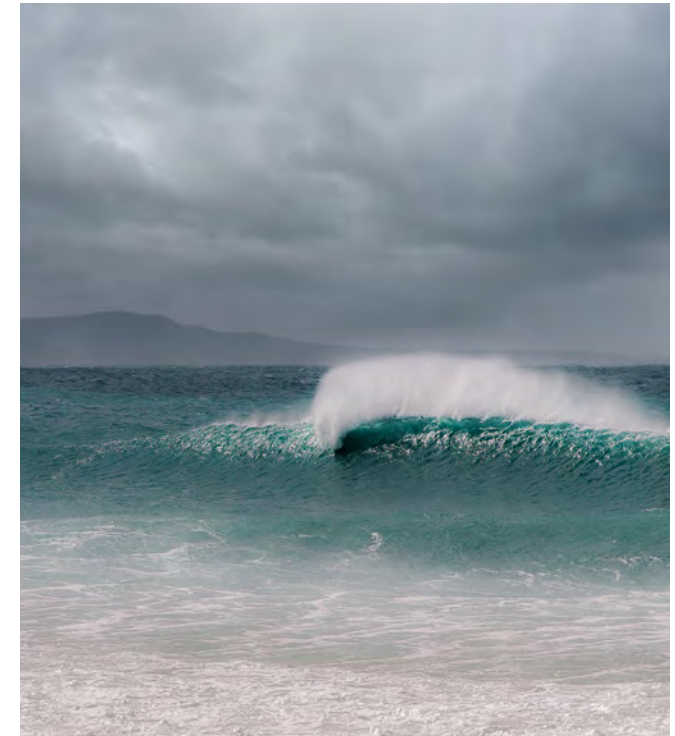
SDGs we contribute to:



Hotel Channel

During 2022 we have maintained the channel that is displayed on the screens located in the rooms and common areas of our establishments, where customers can find out about different aspects of interest to them, such as prices, car parks, restaurants, the environment and quality, among other issues, in a quick and easy way.

It is an eminently informative and dynamic channel, which eliminates paper in line with the chain's policy of sustainability.



Social media

The presence of Vincci Hotels on the social networks is not only constant, but also necessary. Through the different channels of communication we provide information about our establishments and news that may be of interest to our customers, as well as offering a personalised, quick and precise response to those who request information from us.

This immediacy provided by social networks is precisely what allows us to communicate more fluidly with our customers and potential customers. Through their suggestions and proposals we correct mistakes, strengthen our successes and continue to improve.

Law on the Protection of Personal Data (LOPD)

The files containing personal data are registered in the General Register of the Spanish Data Protection Agency. Our chain guarantees the correct treatment of personal data and optimum management of the rights of access, rectification, cancellation and opposition. Our forms include clauses that inform interested parties of those aspects that the Organic Law on Data Protection (LOPD) considers necessary for the rights of individuals to be effectively complied with.

We have updated all our systems, operations and procedures in order to comply with the new Data Protection Law. Likewise, all the professionals who make up Vincci Hotels are aware of the offence against privacy and intimacy involved in the fraudulent use of personal data. For this reason, we make a great effort to ensure that all data is treated in an optimum manner and in accordance with current legislation.

Throughout 2022, the Spanish Data Protection Agency has not passed on any judicial or administrative sanction to us for this reason.

Indicator	2019	2020	2021	2022
Visits to the corporate website and microsites	2.864.705	3.457.871	1.720.150	-
Unique visitors to the corporate website	2.366.269	1.846.758	869.487	723.157
Visits to the Vincci Hotels BLOG	72.009	127.225	632.761	100.280
Fans on Facebook	78.283	84.780	84.916	90.427
Twitter followers	22.242	22.303	22.100	21869
Followers on Instagram	18.853	20.820	28.200	40.407
LinkedIn	29.630	40.407	47.303	52.873

5.4.2 Complaints and claims management approach.

So far, the complaints received are from different areas:

- Complaints about the service received.
- Complaints about room and restaurant prices.
- Complaints about forgotten items that have not been found.

We cannot specify the exact number of complaints, as some are sent directly to the hotel, while others are sent to the central offices and from there they are forwarded to the corresponding hotel. When the client complains about the price, logically nothing can be done from the hotels, as this complaint is made after the stay, so we cannot try to satisfy the client.

Most of the time complaints are due to forgetfulness and also take place after the customer has already left the hotel. The solution usually comes in the form of sending the forgotten item. In some cases, if the item is not found, an apology will be made, as these items are usually of little value.

Complaints about the service received vary in nature and are very subjective, bearing in mind that what is good service for one customer is bad for another. Vincci Hotels offers the same quality of service to all customers.

There is no record of these complaints and there are no indicators. Customers can communicate their message to us once they have returned home or by contacting the staff at the establish-

ment itself, during their stay. In the first case, the procedure is to contact the Quality Department at our central offices, who will then forward the comment to the hotel or department concerned so that the customer can obtain a response as quickly as possible. This commitment to proximity and speed affects all the departments of the chain, so this direct communication is the key to optimising our internal processes and is a clear opportunity for improvement. We can say that in the Group we have had a total of 3,142 negative opinions in online comments.

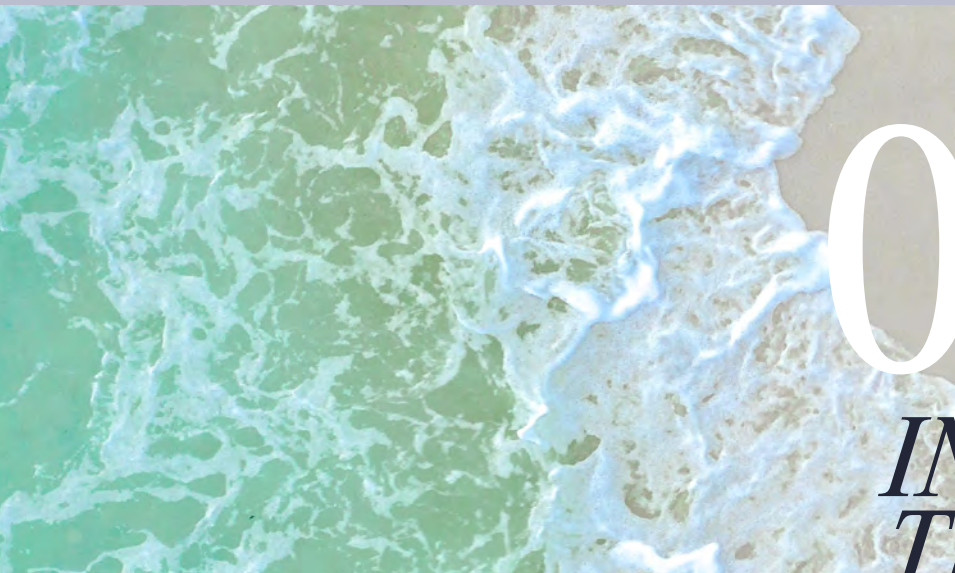
Constructive criticism from our customers helps us to learn from our mistakes and continue improving our professional work, in order to continue growing in our new vocation to offer an unbeatable service, giving the best of ourselves as professionals in the tourism sector at all times.

Knowing how our clients rate our functions enables us to meet the following goals:

- **Identification of customer service issues where there is room for improvement.**
- **To develop direct, clear and effective communication in order to offer the best product and the best service.**
- **To strengthen the relationship of transparency, honesty and trust with each of our clients.**

In this sense, we turn technology into an ally and we also offer a real-time connection with the client, which allows open communication from anywhere and at any time. This effective and transparent communication, based on active listening and focused on the ability to improve, has the ultimate

goal that the customer can describe their stay as an unforgettable experience. In 2022, the percentage of responses to online reviews is 22.9% and for the Group's hotels 21.9%, while the percentage of responses to internal Post Stay questionnaires is 66.28% and for the Group 66.34%. To answer part of the online comments and internal questionnaires, the company has signed up with Hotel Speaker, which uses Artificial Intelligence to create personalised responses with the prior authorisation of the hotel.



06.

INFORMATION ON THE IMPACTS OF THE CURRENT MACROECONOMIC ENVIRONMENT

06

INFORMATION ON THE IMPACTS OF THE CURRENT MACROECONOMIC ENVIRONMENT

Covid-19.

During the financial year 2022, the Group's business activity has gradually recovered after the health crisis caused by Covid-19 described in the consolidated financial statements for the financial years 2021 and 2020.

In financial year 2022, the number of infections caused by COVID-19 was considerably lower than in the previous two years, reaching its lowest levels since the start of the health crisis. During 2022, the Group has continued to make great efforts to minimise infections, adapting protocols, establishing new measures, redesigning processes and making investments with the aim of guaranteeing and preserving the safety and health of all people. These measures have not had a significant impact on the Group's consolidated financial statements in financial year 2022. In addition, the Group's management constantly monitors the evolution of the situation.

Russia - Ukraine conflict.

On 24th February 2022, the armed conflict between Russia and Ukraine began and it continues at the date of preparation of these consolidated financial statements. Faced with this scenario, the European Union, together with the United States and most NATO countries, have condemned the attack and have approved a series of economic measures in the form of sanctions on the Russian economy, with the aim of dissuading them from continuing along the path of military strategy and advocating the diplomatic route. These measures are affecting the economies of all countries.

The macroeconomic scenario resulting from this situation translates into generalised price rises, mainly related to raw materials, energy and transport. In response, interest rates are rising, affecting the banking and financing market.

In this context, even taking into account the complexity and geopolitical risk of this situation, the Group's management has made an assessment of the current situation according to the best information available, evaluating the consequences

of this event on the Group's future operations. To date, these results have not been significant insofar as the Group's activity is not directly exposed to them, and additionally, these impacts have been offset by the flow of trade, transferring the increase in costs due to inflation to the prices of the services provided by the Group, although a worsening of the main macroeconomic variables could affect both customers and the value of the Group's assets, for which reason the Group is constantly monitoring the evolution of the situation.



07.

ANNEX I - IMPLEMENTED CONTENTS OF LAW 11/2018 EINF (NON-FINANCIAL INFORMATION STATEMENT)

ANNEX I - IMPLEMENTED CONTENTS OF LAW 11/2018 EINF (NON-FINANCIAL INFORMATION STATEMENT)

Heading	Sub-Heading	Section of the Act	GRI	Reference to the Report
Business Model	Description of the group's business model	A brief description of the group's business model, including its business environment, organisation and structure, the markets where it operates, its objectives and strategies, and the main factors and trends likely to affect its future development.	GRI 2-6 GRI 2-1	MODULE 1
Information on environmental issues	General	Current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety.	GRI 3-3	MODULE 3
		Environmental assessment or certification procedures	GRI 2-23 GRI 2-12	MODULE 3
		Resources dedicated to environmental risk prevention	GRI 2-12	MODULE 3
		Application of the precautionary principle	GRI 2-23	MODULE 3
		Provisions and guarantees for environmental risks	GRI 3-3	MODULE 3
	Pollution	Measures to prevent, reduce or remediate carbon emissions that seriously affect the environment, taking into account any form of activity-specific air pollution, including noise and light pollution.	GRI 3-3 GRI 302-4 GRI 302-5	MODULE 3
	Circular Economy and waste prevention and management	Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste. Actions to combat food waste	GRI 2-25 GRI 301-1 GRI 301-2 GRI 301-3 GRI 306-2	MODULE 3
	Sustainable use of resources	Water consumption and water supply in accordance with local constraints	GRI 303-1 GRI 303-2 GRI 303-5	MODULE 3
		Consumption of raw materials and measures taken to improve the efficiency of raw material use	GRI 3-3 GRI 302-1	MODULE 3
		Energy: Consumption, direct and indirect; Measures taken to improve energy efficiency, Use of renewable energies	GRI 3-3 GRI 302-1 GRI 302-4	MODULE 3
	Climate Change	Greenhouse Gas Emissions	GRI 305-1 GRI 305-2 GRI 305-3	MODULE 3
		Measures taken to adapt to the consequences of Climate Change	GRI 3-3 GRI 305-5	MODULE 3
		Voluntary medium- and long-term reduction targets set to reduce GHG emissions and means implemented to this end.	GRI 3-3	MODULE 3
Biodiversity protection	Measures taken to preserve or restore biodiversity	GRI 3-3 GRI 304-3 GRI 304-1	MODULE 3	
	Impacts caused by activities or operations in protected areas	GRI 304-1 GRI 304-2	MODULE 3	

ANNEX I - IMPLEMENTED CONTENTS OF LAW 11/2018 EINF (NON-FINANCIAL INFORMATION STATEMENT)

Heading	Sub-Heading	Section of the Act	GRI	Reference to the Report
Social and Staff Issues	Employment	Total number and distribution of employees by gender, age, country and occupational classification	GRI 405-1 b) i,ii	MODULE 4
		Total number and distribution of types of employment contracts	GRI 2-7	MODULE 4
		Average annual number of permanent, temporary and part-time contracts by sex, age and occupational classification	GRI 2-7	MODULE 4
		Number of redundancies by gender, age and occupational classification	GRI 401-1 b)	MODULE 4
		Average earnings and their evolution disaggregated by gender, age and occupational classification or equal value	GRI 405-2	MODULE 4
		Wage Gap	GRI 405-2	MODULE 4
		Remuneration of equal or average jobs in the company	GRI 405-2	MODULE 4
		The average remuneration of directors and the Management Committee, including variable remuneration, allowances, indemnities, payments to long-term savings schemes and any other payments broken down by gender.	GRI 405-2	Group Memory Note 19.3.
		Implementation of work disengagement measures	GRI 3-3	MODULE 4
	Employees with disabilities	GRI 405-1 b) iii	MODULE 4	
	Work organisation	Organisation of working time	GRI 3-3	MODULE 4
		Number of absence hours	GRI 403-9	MODULE 4
		Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents.	GRI 401-3	MODULE 4
	Health and Safety	Health and safety conditions at work	GRI 403-1	MODULE 4
		Accidents at work (frequency and severity) disaggregated by sex	GRI 403-3 GRI 403-9	MODULE 4 (Scope limitation: Tunisia information not reported)
		Occupational diseases (frequency and severity) disaggregated by sex	No material	MODULE 4
	Social Relations	Organisation of social dialogue, including procedures for informing and consulting with staff and negotiating with them	GRI 2-29	MODULE 4
		Percentage of employees covered by collective bargaining agreements by country	GRI 2-30	MODULE 4
Review of collective agreements, particularly in the field of occupational health and safety at work		GRI 403-1 GRI 403-4	MODULE 4	

ANNEX I - IMPLEMENTED CONTENTS OF LAW 11/2018 EINF (NON-FINANCIAL INFORMATION STATEMENT)

Heading	Sub-Heading	Section of the Act	GRI	Reference to the Report
Social and Staff Issues	Training	Policies implemented in the field of training	GRI 3-3 GRI 404-2	MODULE 4
		Total number of training hours per professional category	GRI 404-1	MODULE 4 (Scope limitation: Tunisia information not reported)
	Accessibility	Universal accessibility for people with disabilities	GRI 3-3	MODULE 4
	Equality	Measures taken to promote equal treatment and opportunities for men and women	GRI 3-3	MODULE 4
		Equality plans	GRI 3-3	MODULE 4
		Measures taken to promote employment	GRI 3-3	MODULE 4
		Protocols against sexual and gender-based harassment	GRI 3-3	MODULE 4
		The integration and universal accessibility of persons with disabilities	GRI 3-3	MODULE 4
		Anti-discrimination and, where appropriate, diversity management policy	GRI 3-3	MODULE 4
	Information on respect for human rights	Human Rights	Implementation of human rights due diligence procedures	GRI 3-3
Prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and redress possible abuses committed			GRI 3-3	MODULE 2
Complaints about cases of human rights violations			GRI 2-26	MODULE 5
Promotion and enforcement of the provisions of the ILO core conventions relating to respect for freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the elimination of forced or compulsory labour and the effective abolition of child labour.			GRI 3-3	MODULE 2 MODULE 4 MODULE 5

ANNEX I - IMPLEMENTED CONTENTS OF LAW 11/2018 EINF (NON-FINANCIAL INFORMATION STATEMENT)

Heading	Sub-Heading	Section of the Act	GRI	Reference to the Report
Information relating to the fight against corruption and bribery	Corruption and bribery	Measures taken to prevent corruption and bribery	GRI 3-3	MODULE 2
		Measures to combat money laundering	GRI 3-3	MODULE 2
		Contributions to foundations and non-profit organisations	GRI 3-3	MODULE 2
Company information	Company commitments to sustainable development	Impact of the company's activity on employment and local development	GRI 203-1 GRI 204-1	MODULE 5
		Impact of society's activity on local populations and the territory	GRI 413-1 GRI 203-1	MODULE 5
		Relationships with local community actors and the modalities of dialogue with them	GRI 413-1 GRI 2-29	MODULE 2
		Partnership or sponsorship actions	GRI 2-28	MODULE 5
	Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy	GRI 3-3	MODULE 2
		Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	GRI 2-6 GRI 3-3 GRI 308-1 GRI 414-1	MODULE 1
		Monitoring and audit systems and audit results	GRI 308-1 GRI 414-1	MODULE 1
	Consumers	Consumer health and safety measures	GRI 3-3 GRI 416-1	MODULE 5
		Complaint systems, complaints received and their resolution	GRI 2-26 GRI 3-3	MODULE 5
	Tax information	Benefits obtained per country	GRI 201-1	MODULE 1
		Taxes on profits paid	GRI 201-1	MODULE 1
		Public subsidies received	GRI 201-4	MODULE 1



SUSTAINABILITY REPORT
AND NON-FINANCIAL
INFORMATION STATEMENT
2022