

# ANTI-CORRUPTION POLICY

vîncihoteles



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## 1. OBJECTIVE

The rejection of corruption in all its forms is a basic principle of the Code of Ethics of **Vincici Hoteles**, which is why it approves this Internal Anti-Corruption Policy.

**Vincici Hoteles** is committed to maintaining a position of zero tolerance towards corruption in all its forms, both among individuals and in its relations with Public Administrations.

## 2. TARGET

This Policy applies to all members of **Vincici Hoteles** and includes members of the Board of Directors, General Management and employees (own staff, external staff or trainees).

## 3. RISK SCENARIOS.

This Policy applies to the risk scenarios in which employees and other persons acting on behalf of **Vincici Hoteles** may find themselves, establishing minimum standards.

### 3.1 Gifts, hospitality, donations and similar benefits

Gifts, entertainment or donations, within reasonable limits, are used to strengthen professional and business relationships and are perfectly legitimate; however, if they are frequent or of considerable value, they may take on the appearance of corruption.

Keeping a control will be essential in any type of professional or commercial relationship between **Vincici Hoteles** and third parties, especially with public bodies or administrations.

### 3.1.1 Gifts, entertainment and hospitality

a) Controlling the degree and frequency of gifts and hospitality: Gifts and hospitality are permitted in the following circumstances:

- Gifts of modest or token value may be made.
- Under no circumstances may cash or cash equivalents (vouchers or gift cards) be offered or accepted.
- Gifts or other types of hospitality may only be offered or accepted if they do not violate the law or if they are prohibited under a valid contract.
- This Policy shall be respected at all times by third parties with whom the Company has business relations.

**Vincci Hoteles** relates, following these indications scrupulously.

- Gifts made in the form of services or benefits (e.g., promise of employment) will not be accepted or offered.
- Gifts and invitations may be given or accepted as long as they do not exceed the amount of 200 euros.
- Gifts or invitations may not be given to the same person more than 3 times a year.
- The cumulative value of gifts received by the same third party may not exceed 500 euros within a period of one year.
- Gifts shall not be made during or immediately following the negotiation of a contract or the award of a bid.

b) When gifts and acts of hospitality exceed the established value or frequency, they shall require the prior approval of the General Management, as well as being documented or registered.

### 3.1.2 Invitations and other promotional expenses

Invitations can play an important role in strengthening professional and commercial relationships and implementing an effective commercial policy, so this type of expenditure is allowed, provided that: They are related to a legitimate business purpose of **Vincci Hoteles**:

- Are not made in a manner that could be perceived or interpreted as a bribe;
- Be infrequent;
- Be held in an appropriate place of business;
- Are appropriate in the context of a business relationship.

On the other hand, they are prohibited:

- Excessive invitations in the context of the commercial occasion;
- Invitations that include obscene or inappropriate behavior;
- Invitations explicitly prohibited by law;
- Invitations explicitly prohibited by the customer/supplier;
- Invitations explicitly prohibited under the contract.

### 3.1.3 Travel

In relation to trips whose expenses, total or partial, are assumed by **Vincchi Hoteles**, the following are allowed:

- In the framework of events organized by **Vincchi Hoteles**, private experts or officials may be invited to attend.
- These payments are restricted to necessary travel, lodging and meals directly associated with a reasonable travel itinerary;
- The payment of expenses not restricted to those mentioned above is prohibited, therefore, payments related to activities that may be considered as leisure activities are expressly excluded.
- Payment of expenses of family members or friends is prohibited;
- Payment of vacation or recreational expenses is prohibited.

### 3.1.4 Political contributions or donations

**Vincchi Hoteles** does not make contributions or donations to political parties of any kind. For this reason, it is strictly forbidden to make any type of donation, whether financial or in kind, on behalf of **Vincchi Hoteles** to political parties, party officials, candidates, persons involved in politics or organizations that have close relations with a political party.

### 3.1.5 Philanthropic activities

**Vincchi Hoteles** maintains a permanent line of collaboration with charitable causes and projects.

Thus, events are organized on a regular basis, all of the proceeds of which are donated to NGOs, which must be carried out with total transparency:

- Publicize the charity event in the beneficiary's own media and in the beneficiary's media.
- avoid holding such an event in the event that it coincides in time with the negotiation of a contract between the parties.

## 3.2 Facilitation payments.

Facilitation payments are small, unofficial and improper payments made to a low-level official to obtain or expedite a routine or necessary business transaction.

Facilitation payments may be given to public officials to obtain licenses, permits, certificates and other types of public services.

**Such facilitation payments are bribes and are prohibited by the United Nations Convention against Corruption and, therefore, prohibited by this Policy.**

**Exception to the prohibition:** in the event that the request for a facilitation payment is accompanied by a certain and concrete threat to the safety and/or well-being of the employee or his or her family and relatives.

## 3.3 Business Partners

**Vincci Hoteles** may choose to require its business partners, agents or intermediaries to comply with any of the following requirements:

- a) That the business partners undertake to prevent corruption in all its forms by, on behalf of, or for the benefit of the business partner in connection with the relevant transaction, project, activity or relationship.
- b) That **Vincci Hoteles** terminates the relationship with the business partner in the event of corruption by or on behalf of or for the benefit of the business partner in connection with the relevant transaction, project, activity or relationship.

No employee of Vincici Hoteles may hire any person or company suspected of being or having been involved in corrupt activities.

## 3.4 Conflict of interest

A conflict of interest shall exist when a member of **Vincci Hoteles** has professional, personal or private interests that deviate from the interests that such person is expected to have when representing the company, i.e. when the person's interests are in conflict with those of **Vincci Hoteles**.

Conflicts of interest occur in all organizations, but they are not negative per se, so they are also regulated in this Policy to prevent legal and beneficial actions for **Vincci Hoteles** from being misinterpreted.

When a conflict of interest situation is detected that may be detrimental to **Vincci Hoteles**, it will be evaluated by the Compliance Committee, which will seek the simplest solution in order to avoid the materialization of the Conflict of Interest when:

- A member of the Board of Directors or General Management has been offered an additional external appointment in a company that puts his or her personal and institutional interests in conflict.
- A person who causes the conflict of interest of the particular situation.
- If a person in a negotiation causes the conflict, have an internal or external third party validate the negotiated contractual terms and record that they are not detrimental to **Vincci Hoteles**.

All decisions that may involve a conflict of interest in the terms described above must be justified and documented as evidence of the commitment of **Vincci Hoteles** in the fight against corruption.

### 3.5 Personnel Due Diligence

**Vincci Hoteles** applies diligent measures in its selection and hiring procedures to prevent the hiring of persons that may involve a conflict of interest.

Thus, in the selection and hiring processes, guidelines and controls to be applied to candidate personnel and new hires are established in order to prevent the incorporation of a risk element into the company.

## 4. NON-COMPLIANCE. SUSPICIOUS ACTIVITY REPORTING.

If you are aware of any conduct (active or passive) contrary to the contents of this Policy, or any other internal regulation, we remind you that you can file the corresponding complaint through the Communication Channel, which can be accessed through:

- **email address: [canaldedenuncias@vincchihoteles.com](mailto:canaldedenuncias@vincchihoteles.com)**

**Vincci Hoteles** guarantees the confidentiality of all information communicated. All those persons who in good faith transmit their notifications will be protected against any type of discrimination and penalization on the grounds of the reports made. False or defamatory reports may be subject to penalties or give rise to the exercise of the actions to which they may give rise in law.



This same channel may be used by interested parties to report other issues of interest or doubts about the application of this Policy.

## 5. POLICY PUBLICITY.

This Policy will be made available to all members of **Vincci Hoteles** and may be published on the web page as a sign of transparency before third parties, both private partners and public administrations.

The Policy will be the subject of appropriate communication, training and awareness-raising activities to ensure that it is properly understood and put into practice within the Group.

## 6. APPROVAL AND ENTRY INTO FORCE.

This Policy is approved by the Board of Directors of the parent company of **Vincci Hoteles** and comes into force on the day of its approval and will remain in force until its cancellation is approved.