

# CRIMINAL COMPLIANCE POLICY



**CHANGE CONTROL**

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## **Criminal Compliance Policy**

### **1. Target**

The Sole Administrator of VINCCI HOTELES, S.A., (hereinafter, VINCCI HOTELES), complying with the provisions of the Criminal Code and the UNE 19601:2017 standard ("Criminal Compliance Management System"), approves the following Criminal Compliance Policy.

### **2. Responsible Department**

The establishment and implementation of the Criminal Compliance Policy is the responsibility of the management body, in this case the Sole Administrator.

### **3. Participating Departments**

The Compliance Committee of VINCCI HOTELES will ensure that this policy is kept up to date and that the corresponding changes are made to it.

The Management of VINCCI HOTELS, as well as the Compliance Committee, together with Human Resources, shall facilitate compliance with these policies, providing the means that are reasonably necessary for their compliance and achievement.

All areas and departments of VINCCI HOTELS are affected by this policy, so they must collaborate in complying with it and adjust their conduct to the highest ethical standards and internal values of VINCCI HOTELS.

Such compliance is not limited to the mere fulfillment of what is required by the rules but also to denounce any conduct or activity not in accordance with the same that is carried out within VINCCI HOTELES, demanding that each and every one of us at VINCCI HOTELES is aware of the importance of compliance with legislation and regulations, as well as internal rules.

### **5. Scope**

This policy is general in scope and therefore applies to all VINCCI HOTELS.

Its application, knowledge and compliance shall be required to all VINCCI HOTELS personnel (management and employees), to any present or future company involved in VINCCI HOTELS processes and services and, in general, to all those interested parties and business partner personnel with a regular relationship with the organization.

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# 1. Target

VINCCI HOTELES develops its activity in the hotel sector. In VINCCI HOTELES we aim to develop our activities in compliance with all regulatory, legal and regulatory requirements that apply to us by the characteristics of our services, as well as to ensure both internally and to our customers, society and other stakeholders.

For this reason, the Sole Administrator and the General Management will promote the existence in VINCCI HOTELS of a culture of regulatory compliance, based on the highest ethical standards, practicing a zero tolerance policy with respect to criminal risks, as well as establishing measures aimed at their prevention, early detection and management, prohibiting the commission of any criminal act.

With the present Policy we want to achieve, mainly:

- To inform management, department heads, employees, as well as the organizations with which we participate in our operations, that the performance of our duties must be based at all times on compliance with applicable laws and regulations, our Code and, therefore, our ethical principles and values.
- Define the framework for the development of our Criminal Compliance Management System and for the definition of our objectives, aimed at improving its efficiency.

This Policy shall apply to the Governing Body, Senior Management, Area Directors, department heads, employees and business partners, and shall apply to all processes and activities carried out in VINCCI HOTELS, in accordance with the provisions of the document on scope, context and stakeholders of the Criminal Compliance management systems.

## 2. Purposes of the Organization

- PRINCIPLES AND VALUES

The principles of action on which this Criminal Compliance Policy is based are as follows:

- Familiarity

- Respect for people
- Honesty and integrity in business
- Transparency
- Enhancing the value of our human resources
- Environmental responsibility
- Social responsibility
- Respect for human and labor rights.
- Equal opportunity.
- Health and safety.
- Professional development and training.
- Confidentiality.
- Knowledge of customers.
- Information: honest and responsible communication.
- Quality.

### **3. Commitments**

For the correct fulfillment of this Policy, VINCCI HOTELS acquires the following commitments:

- Act in accordance with current regulations, the VINCCI HOTELS Code of Ethics and internal policies and procedures.
- To be congruent with the principles and values of VINCCI HOTELS.
- Promote a culture of compliance and zero tolerance to the commission of illicit and fraudulent acts.
- To develop, support and constantly improve the Criminal Compliance Management System that allows us to identify, evaluate and manage the risks of non-compliance that may occur in our processes, in order to minimize the exposure of VINCCI HOTELES to them. To this end, VINCCI HOTELES has developed a Risk Map that provides an overview of the potential risks that could materialize within the organization in order to identify them and prevent their commission.
- Require and constantly supervise compliance with all criminal legislation applicable to our operations.
- Ensure continuous improvement of the Criminal Compliance Management System. All the information obtained and managed in the monitoring and evaluation process will be used to detect opportunities for improvement and to adopt

actions aimed at optimizing the Criminal Compliance Management System of VINCCI HOTELS on an ongoing basis.

- Define and review the achievement of criminal compliance objectives.
- To grant the necessary authority and independence to the Compliance Committee as an autonomous body to supervise the degree of effectiveness and compliance of the Criminal Compliance Management System.
- It will be guaranteed at all times that the whistleblower will not be subject to retaliation and that his or her confidentiality will be protected, for which our anonymous Whistleblower Channel is available to ensure independence, confidentiality and absence of retaliation.

<http://faro.auren.es/FormularioPublico/LadingPage?Token=14ddb429-fd50-40fd-94b9-22dab6f08cdc>

- Support the application of the applicable disciplinary regime in accordance with the provisions of the Workers' Statute, the Sector Collective Bargaining Agreement and the Penal Code, as well as any other applicable regulations that sanction conduct contrary to the applicable laws and regulations, and to the requirements of this Policy and our Criminal Compliance Management System.

The Sole Administrator undertakes to comply with this Criminal Compliance Policy, as well as with the requirements contained in the Management System that develops them, and as evidence of this, proceeds to the approval of this document.

#### **4. Consequences of Noncompliance**

Non-compliance with this Policy, the Code of Ethics or any other policy or procedure that forms part of the VINCCI HOTELES Criminal Compliance Management System, which are detected during the monitoring and evaluation process, or by complaint filed through the Complaints Channel or by any other means, will be reported to the System Manager as the person responsible for the management of those non-compliances of which he/she is aware.

Failure to comply with this Policy and related internal regulations may result in labor sanctions, without prejudice to any administrative or criminal sanctions that, if applicable, may also result.



You can be sanctioned according to the regulations labor law the following behaviors:

- Failure to report a breach of the Code of Ethics upon becoming aware of it.
- Making false allegations, with the purpose of harming a third party.
- Engaging in any discriminatory or harassing behavior against a person who has made a complaint.
- Failure to comply with the provisions of this policy.

The Disciplinary Regime is governed by the applicable labor legislation in force and, in particular, by the applicable sector collective bargaining agreement and the Workers' Statute.

On the other hand, the consequences applicable to business partners subject to this policy (customers and suppliers), could be:

- Termination of the contractual relationship;
- Liabilities regulated in the applicable regulations (civil, criminal, commercial, etc.).

Finally, depending on the seriousness of the facts, they may be brought to the attention of the authorities.