

ANTI-CORRUPTION POLICY

vincchoteles



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1. OBJECTIVE

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

Vincci Hoteles is committed to maintaining a position of zero tolerance towards corruption in all its forms, whether between private individuals or in its relations with Public Administrations.

2. TARGET

This Policy applies to all members of **Vincci Hoteles** and includes members of the Administrative Body, General Management, Directors, Hotel Managers and other employees (own staff, external staff or trainees).

3. RISK SCENARIOS.

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

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 can take on the appearance of corruption.

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

3.1.1 Gifts, entertainment and hospitality

a) Controlling the extent 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.
- Only gifts or other types of hospitality may be offered or accepted if they do not violate applicable law or are not expressly prohibited under an existing contract.
- This Policy is to be respected at all times by third parties with whom we have dealings. **Vincci Hoteles** relates, following these indications scrupulously.
- Gifts in the form of services or benefits (e.g. promise of employment) shall not be accepted or offered.
- Gifts and invitations may be given or accepted provided that they do not exceed EUR 200 (or the equivalent in local currency).
- 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 EUR 500 (or the equivalent in local currency) within a period of one year.
- Gifts shall not be given during or immediately after the negotiation of a contract or the award of a tender.

b) Acceptance of gifts or hospitality in excess of the limits and frequency referred to herein is not admissible and must be immediately returned or refused. If return is not reasonably possible, acceptance must be authorised in writing by:

-In Central Offices: by the Director General.

-In Hotels: by the Regional Directors within each of them, in their area of influence.

Once acceptance has been authorised, it shall be recorded in writing and 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 expenditure is permissible, provided that:

- Are related to a legitimate business purpose of **Vincci Hoteles**;
- Not in a way that could be perceived or interpreted as a bribe;
- Be infrequent;
- Be held in a place suitable for 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 involving obscene or inappropriate behaviour;
- 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 total or partial expenses are assumed by **Vincci Hoteles**, the following are permitted:

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

3.1.4 Political contributions or donations

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

3.1.5 Philanthropic activities

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

Thus, events are organised on a regular basis, all of the proceeds of which go to NGOs, which must be carried out with total transparency, and efforts will be made to ensure this:

- publicise the charity event in the beneficiary's own media and in the beneficiary's media.
- avoid holding such an event in case it coincides in time with 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 can be given to public officials to obtain licences, 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 case 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 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 the relevant transaction, project, activity or relationship.

No employee of Vincci 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 this person is expected to have when representing the company, i.e. when the interests of the person are in conflict with those of **Vincci Hoteles**.

Conflicts of interest occur in all organisations, but they are not negative per se, which is why they are also regulated in this Policy in order to prevent legal actions that are beneficial to **Vincci Hoteles** from being misinterpreted.

When a situation of conflict of interest is detected that may be detrimental to **Vincci Hoteles**, it shall be evaluated by the Compliance Committee, which shall seek the simplest solution in order to avoid the materialisation 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 set out above must be justified and documented as evidence of **Vincci Hoteles'** commitment to the fight against corruption.

3.5 Personnel Due Diligence

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

Thus, in the selection and hiring processes, guidelines are established for action and controls to be applied to candidate personnel and new hires, with the aim of preventing the incorporation into the company of a risk element.

4. NON-COMPLIANCE. SUSPICIOUS ACTIVITY REPORTING.

If you become aware of any conduct (active or passive) contrary to the content 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:

<https://www.vinccihoteles.com/landing-pro/canal-denuncias/>

Vincci Hoteles guarantees the confidentiality of all information communicated. All persons who, in good faith, transmit their notifications will be protected against any type of discrimination and penalisation on the grounds of the reports made. False or defamatory reports may be subject to sanction or give rise to the exercise of the actions that may be applicable in law.

This same channel can be used by stakeholders to report other issues of concern or questions about the application of this Policy.

5. POLICY PUBLICITY.

This Policy will be made available to all members of **Vincci Hoteles** and may 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 Internal Policy is approved by the Administrative Body of the parent company of **Vincci Hoteles** and comes into force on the day of its approval, remaining in force until its annulment is approved.

7. WRITING AND EDITING.

DRAFTED	REVISED	APPROVED
Name: AUREN CONSULTORES, SP, S.L.P. Date:19/04/2024	Name: VINCCI JUDICIAL DEPARTMENT Date:19/04/2024	Name: MANAGING BODY OF VINCCI HOTELS Date:19/04/2024

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