

POLICY OF CRIMINAL COMPLIANCE

vincchoteles



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1. OBJECTIVE

VINCCI HOTELES operates in the hotel sector. At VINCCI HOTELES we aim to carry out our activities in compliance with all the legal and regulatory requirements that apply to us due to the characteristics of our services, as well as being able to ensure this both internally and to our clients, society and other interested parties.

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

The Sole Director and the General Management shall promote the existence in VINCCI HOTELES of a culture of regulatory compliance, based on the highest ethical standards, practising 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 offence.

With the present Policy we want to achieve, mainly:

- Inform management, department heads, hotel managers and other employees, as well as the organisations with which we participate in our operations, that the performance of our duties must at all times be based on compliance with applicable laws and regulations, our Code of Ethics and, therefore, our 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.

2. SCOPE

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

Its application, knowledge and compliance will be required of the Governing Body, Senior Management, Area Managers, Department Managers, Hotel Managers, other employees and business partners, and will apply to all processes and activities carried out in VINCCI HOTELS, in accordance with that established in the documents, context and interested parties of the Criminal Compliance management systems.

3. AIMS OF THE ORGANISATION

- 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 labour rights.
- Equal opportunities.
- Health and safety.
- Professional development and training.
- Confidentiality.
- Knowledge of clients.
- Information: honest and responsible communication.
- Quality.

4. COMMITMENTS

For the correct fulfilment of this Policy, VINCCI HOTELS undertakes the following commitments:

- Act in accordance with current regulations, the VINCCI HOTELS Code 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 of wrongdoing and fraud.
- 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 minimise VINCCI HOTELES exposure to them. To this end, VINCCI HOTELES has drawn up a Risk Map that provides an overview of the potential risks that could materialise within the organisation in order to identify them and prevent their commission.
- Enforce and constantly monitor compliance with all criminal legislation that applies to our operations.
- Ensure the 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 optimising the VINCCI HOTELES Criminal Compliance Management System on an ongoing basis.
- Define and review the achievement of criminal compliance objectives.
- 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.

- Whistleblowers will be guaranteed at all times not to be subject to retaliation and their confidentiality will be protected. To this end, our anonymous Whistleblower Channel is at their disposal to ensure their independence, confidentiality and freedom from retaliation.

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

- Support the application of the applicable disciplinary regime in accordance with the provisions of the Workers' Statute, the applicable Collective Bargaining Agreements and Criminal Codes, as well as any other applicable regulations that sanction conduct contrary to the applicable laws and regulations, and to 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 set out in the Management System that develops them, and as evidence of this, proceeds to the approval of this document.

5. RESPONSIBLE DEPARTMENT

The establishment and implementation of the Criminal Compliance is the responsibility of the Management Body, in this case the Sole Administrator.

6. PARTICIPATING DEPARTMENTS

The Compliance Committee of VINCCI HOTELES shall 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 fulfilment and achievement.

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

This compliance is not limited to the mere fulfilment of what is required by the rules, but also to denouncing any conduct or activity that does not comply with them that is carried out within VINCCI HOTELES, demanding that each and every one of us at VINCCI HOTELES is aware of the importance of complying with the legislation and regulations, as well as with the internal rules.

7. CONSEQUENCES OF NON-COMPLIANCE

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 a complaint filed through the Complaints Channel or by any other means, shall 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 employment sanctions, without prejudice to any administrative or criminal sanctions that may also result.

You can be sanctioned according to a the regulations labour law the following behaviours:

- a. Failure to report a breach of the Code of Ethics when you become aware of it.
- b. Making false allegations, with the aim of harming a third party.
- c. Engage in any discriminatory or harassing behaviour against a person who has made a complaint.
- d. Failure to comply with the provisions of this policy.

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

- e. Termination of the contractual relationship;
- f. 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.

8. 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.

9. WRITING AND EDITING

DRAFTED		REVISED	APPROVED
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