



ETHICAL CODE



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1. Introduction

This Ethical Code regulates the activities of the Hotma Hotels Group (below referred to for simplicity as the Company) in the context of the business activities it carries out and generally in its relations with third parties.

The Company, other than complying, in the conduct of its business with the laws and regulations in force, intends to observe high ethical standards in the daily conduct of its work. These standards and their guiding principles are collected in this Ethical Code (also referred to as the Code).

The Code is a supplementary instrument to legal or regulatory provisions. The Company believes that corporate decisions and the conduct of its personnel are based on ethical rules, even in cases where they are not codified by specific regulations.

The Code expresses the commitments and ethical responsibilities assumed by all those who, in various capacities, collaborate in the achievement of the Company's objectives, concerning capital holders, employees, collaborators, external consultants, suppliers, customers and other subjects, as bearers of interests linked to the Company's activities.

The Code is available to customers, suppliers and other third parties who interact with the Company: in particular, it is brought to the attention (also with computer systems or via website) of third parties who receive assignments from the Company, or who have lasting relationships with it, inviting them to respect the principles and criteria of conduct, within the framework of their relations with the Company itself.

In addition, with the same methods or even with direct delivery, the code is made known to all staff.

2. Principles of conduct for the organisation

Hotma Hotels Group acts with honesty and integrity and respects all laws and any local, national or international regulations applicable in Italy.

Hotma Hotels Group acts with respect for human rights in terms of inclusiveness, equity and sustainability, rejecting all forms of discrimination, whether sexual, religious or political.

The code of ethics, adopted by the staff of the hotels and headquarters, regulates behaviour and obligations towards employees, customers, suppliers and the community.

Rejection of all discrimination and reduction of inequalities

In decisions affecting relationships with its stakeholders (choice of clients, relations with capital owners, personnel management and work organisation, selection and management of suppliers, relations with the surrounding community and the institutions representing it), the Company avoids any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions

and religious beliefs of its interlocutors. The same criterion is adopted in the recruitment and relations with staff.

Development of human resources for professional and economic growth

The management of human resources is based on respect for the personality and professionalism of each person, guaranteeing their physical and moral integrity: the staff must always behave respectfully toward the persons with whom they come into contact on behalf of the Company, treating everyone equally and with dignity. The Society rejects any form of forced or underage work and does not tolerate human rights violations. It also strives to enhance its employees by supporting their continued employability and professional growth - in line with the aspirations and capabilities of each person.

Responsible consumption and production for health, safety and environmental protection

The Company intends to conduct its activities in a socially responsible and environmentally sustainable way, with the implementation of an environmental management system that covers the production of waste, energy consumption, and the use of water and carbon dioxide emissions. It also takes care to disseminate correct and truthful information about its activities.

Legality: Compliance with laws and regulations

The Company operates in strict compliance with the law and strives to ensure that all personnel act in this sense: people must behave according to the law, whatever the context and activities carried out. This commitment must also apply to consultants, suppliers, customers and anyone who has relations with the Company.

3. Principles to be followed by staff

The staff (meaning directors, employees and collaborators in various capacities) in their behaviour towards the Company must observe the following principles.

Professionalism

Each person carries out his work and his performance with diligence, efficiency and fairness, making the best use of the tools and time at his disposal, and assuming the responsibilities related to the development of his tasks and role.

Honesty and loyalty

As part of their work, people must know and diligently comply with the organizational model and laws in force. Under no circumstances may the pursuit of the Company's interest justify conduct that is dishonest or does not comply with regulations. People are bound to be loyal to their colleagues' society.

Correctness

Persons shall not use for personal purposes - except to the extent permitted - information, goods and equipment that they possess in the performance of their assigned function or assignment. Each person shall not accept or make, for himself or others, any pressure, recommendation or report that could be detrimental to the Company or undue advantage to himself, to the Company or third parties; any person shall refuse and does not make promises of undue offers of money or other benefits.

Confidentiality

Persons shall ensure the utmost confidentiality regarding information and information constituting the company's assets or relating to the company's activities, in compliance with the provisions of law, current regulations and internal procedures. In addition, the persons of the Company are obliged not to use confidential information for purposes not related to the exercise of their business.

Resolution of conflicts of interest

Persons shall inform their superiors or contact persons without delay of situations or activities in which there may be a conflict of interest with that of the Company, by the persons themselves or their next relatives, and in any other case where there are relevant reasons of convenience. People respect the decisions made by the Company in this regard.

4. Relations with employees and collaborators

Staff selection

The evaluation of the recruitment of the staff is carried out based on the correspondence of the candidates' profiles, concerning those expected and the company's needs, in compliance with equal opportunities for all stakeholders, as well as in compliance with current regulations. The information requested is closely linked to the verification of the aspects required by the professional and psycho-aptitude profile, respecting the private sphere and the views of the candidate. The Company adopts, in the selection activity, appropriate measures to avoid favouritism and facilitation.

Establishment of the employment relationship

Staff shall be engaged under a regular employment contract or legally permissible contracts; no form of irregular work shall be tolerated. When the employment relationship is established, the person receives detailed information on:

- Characteristics of the function and tasks to carry out
- Regulatory and remuneration elements
- Rules and procedures to be adopted to avoid possible occupational health risks

People management

The Company is attentive and sensitive to people, aware that respect encourages listening and teamwork. It is attentive to the needs of all stakeholders and recognizes the dialogue as a tool for the exchange of information and the construction of the relationship. He is aware that differences are wealth and is committed to having an always inclusive and helpful attitude, exploiting diversity for personal and professional growth and condemning any attitude of intolerance.

Integrity and protection of the person

The Company protects workers from acts of violence including psychological and counteracts any discriminatory attitude or behaviour. The achievement of individual objectives must be assessed fairly. In particular, the Company considers unacceptable any act or behaviour that constitutes harassment or violence in the workplace and undertakes to take appropriate measures against the person or persons who have put them in place.

Harassment or violence means the following definitions:

- Harassment occurs when one or more individuals are repeatedly and deliberately abused, threatened and/or humiliated in the context of work.
- Violence occurs when one or more individuals are attacked in the context of work.

Harassment and violence may be perpetrated by one or more superiors, or by one or more workers, with the aim or effect of violating the dignity of the person, harming health and/or creating a hostile working environment.

In the company, everyone must collaborate maintaining a working environment in which the dignity of each person is respected, and interpersonal relationships are encouraged, based on principles of equality and mutual fairness. Any discriminatory acts must be immediately reported to the responsible persons or the referents, without fear of any kind of retaliation.

Disparities shall not be regarded as discrimination if they are justified or justifiable based on objective criteria. The difference in pay or level about similar tasks shall not be regarded as discrimination.

Safety and health

The Company is committed to providing a working environment that protects the health and safety of its staff, is committed to spreading and consolidating a safety culture, developing risk awareness and promoting responsible behaviour on the part of all persons; the Company also works to preserve, especially with preventive actions, the health and safety of workers, collaborators and third parties.

All persons must comply with internal rules and procedures on risk prevention and health and safety protection, and promptly report any deficiencies or non-compliance with the applicable rules.

Particular attention is paid to training and information on risks and implementing measures relating to occupational health and safety.

Protection of privacy

In the processing of the personal data of its staff, the Company complies with the provisions contained in Legislative Decree 196/2003 and Regulation U.E. cited n. 2016/679, if applicable. Individuals are provided with information on the protection of personal data that identifies purposes and methods of processing, any subjects to whom the data are communicated, and information necessary for the exercise of the right of access referred to in Article 13 of Legislative Decree 196/2003. In cases where required by law, people are asked for their consent and the processing of their data. Any investigation into the ideas, preferences, personal tastes and, generally, the privacy of employees and collaborators is excluded. Instruments may be adopted to control the use of company vehicles and tools, in compliance with current legislation.

5. Relations with the guests

Customer Satisfaction

The company is committed to managing the relationship with customers to meet the expectations related to the stay experience. Constantly listen to the comments of guests to improve the services offered and respond quickly to individual comments and comments.

Behaviour

The company acts towards clients openly and inclusively and repudiates any behaviour that may lead to discrimination related to gender, sexual orientation, nationality or religion. It strives to make its hospitality inclusive and accessible to all. The behaviour towards our guests is based on availability, respect and courtesy in a perspective of superior customer care.

Confidentiality and Security

Confidentiality, discretion and compliance with the procedures related to the services offered are essential for proper behaviour towards our customers. Information and data are processed according to the current privacy regulations.

Correctness

Commercial communications relating to the services and products offered are always verifiable and verified. The company acts so that the customer is always protected during the service purchase.

6. Relations with the suppliers

Choice of supplier

The purchasing processes are based primarily on the enhancement of the local community, combined with the search for the best advantage for the Company, the granting of equal opportunities to suppliers, loyalty and impartiality: the selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality and price of the good or service, as well as guarantees of assistance and timeliness and the possibility of establishing lasting trade relations.

Integrity and sharing of values

Suppliers and partners must take all measures consistent with the nature and size of their organization to ensure compliance, the defence and communication of the principles contained in this Code within the Company and its supply chains.

Protection of ethical aspects in supplies

With a view to aligning procurement activities with the ethical principles adopted, the Company may introduce, for particular supplies and if deemed necessary, social requirements.

7. Relations with the community

Environmental protection

Environmental protection is a priority. The staff of the hotels and headquarters adopt virtuous behaviours to reduce their environmental impact.

Local impact

The company supports local communities by collaborating with associations, participating in initiatives in favour of people and the environment, preferring local suppliers and promoting the development of tourism in the area.

Development of local communities

The company supports and values the heritage and local communities in a perspective of respect, conservation and culture for future generations. It supports initiatives that have a positive impact on the territory and its population.

8. Application of the Ethical Code

Dissemination and communication

The Company undertakes to disseminate the Ethical Code, using all available means of communication and opportunities, for example, the company website, specific communications, including information technology, information meetings and staff training.

All interested persons must be able to access the Code of Ethics; moreover, all employees are responsible for knowing and respecting its contents.

Monitoring of the implementation of the Ethical Code

The task of verifying the implementation and application of the Ethical Code falls on the Company's management functions. However, each employee is responsible for verifying their application within the scope of their controls, as well as for reporting breaches, thus helping to protect the group, employees, customers and suppliers.

Reporting problems or suspected violations

Anyone who becomes aware of, or is reasonably convinced of, the existence of a breach of this Code, a particular law or business procedures, must immediately inform their manager or contact your HR department.

The Company implements the necessary measures to protect the confidentiality of whistleblowers and other persons involved, without prejudice to legal obligations.

Reports are treated confidentially to protect the confidentiality of the information and data contained therein. Whistle-blowers and any person who cooperated in the investigation activities shall be protected against any way of retaliation, threat or discrimination.

The responsibility for investigating possible violations of the Code of Ethics lies with the appropriate administrative body, which may listen to the author of the report and the person responsible for the alleged violation: staff are required to cooperate fully in any internal investigations.

As a result of this activity, those behaviours that motivate the application of any disciplinary sanctions or the activation of contractual mechanisms will be reported to the function in charge.

In the case of reports relating to unlawful conduct (with criminal relevance), for employees, suppliers and customers the appropriate Whistleblowing channel is available on company websites.

9. Disciplinary measures due to infringements

The provisions of this Code are an integral part of the contractual obligations assumed by the staff, as well as by subjects having business relations with the Company.

Compliance with the principles and behaviours indicated in the Code of Ethics is decisive in maintaining the trust relationship between the Company and those who interact with it, whether directors, employees, consultants, collaborators, customers or suppliers.

Towards employees

The failure and/or violation of the rules of conduct indicated in this Code by employees of the Company constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions - according to a principle of graduality concerning the gravity of the breach.

The sanctions imposed will be applied in compliance with the provisions of the Law and the National Collective Labour Agreement applied and will be paid according to the importance that assume the individual cases considered and will be proportionate to their severity. The detection of such infringements, the management of disciplinary procedures and the imposition of sanctions remain the responsibility of the corporate functions in charge and delegated.

To collaborators, consultants and third parties

Any conduct carried out in violation of this Code by collaborators, consultants or other third parties linked to the Company by a contractual relationship that is not an employee may, in the most serious cases, also the ending of the contractual relationship, without prejudice to any claim for compensation if such behaviour results in damages to the Company and this also regardless of the termination of the contractual relationship.

10. Final provisions

This Ethical Code is approved by the Company's Board of Directors and will be updated accordingly. Any changes and/or additions to this Code will be approved by the Board of Directors and will be promptly distributed to the recipients concerned.