

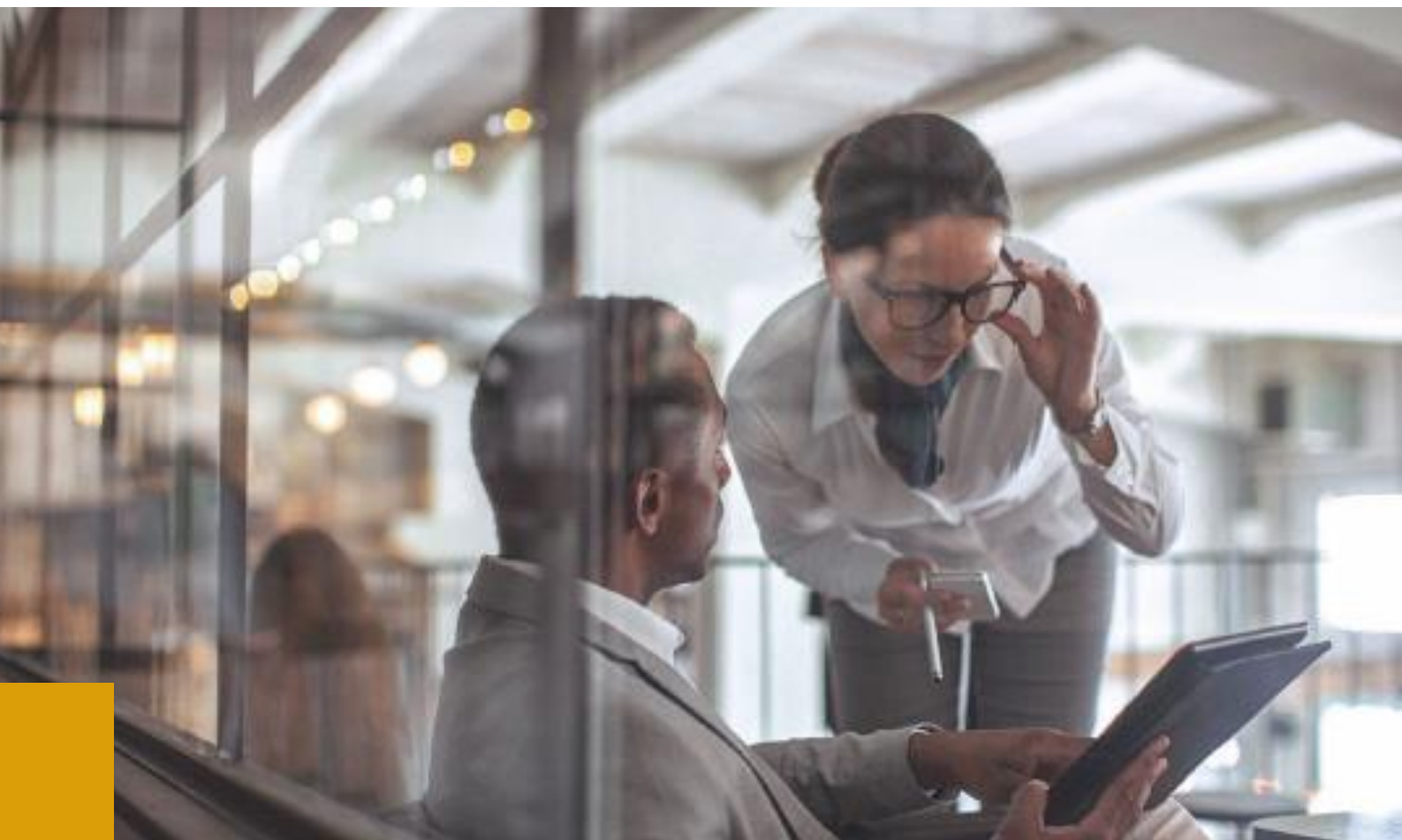


SARDINERO
HOTELES

Santander - Madrid

Supplier code of ethics

EL SARDINERO, S.A.



2023

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1. INTRODUCCIÓN ♦

El Sardinero, S.A. is a hotel group with more than one hundred years of history. It was founded in 1901, and its main corporate purpose is hotel management, with three emblematic establishments in Santander, Cantabria (Gran Hotel Sardinero, Hotel Bahía and Hotel Hoyuela). These establishments were joined by one more in 2017, the Hotel Sardinero in Madrid.

All the hotels are four-star category and have modern facilities to guarantee the comfort of your stay. They are located in areas of great tourist interest from which you can access all the cultural and gastronomic offer of the cities.

The Group drives and promotes its commitment to quality and values its suppliers as a fundamental element for the achievement of its principles and values, and therefore seeks to establish relationships with them based on trust, respect for free competition and mutual benefit.

This code will define the minimum standards of behaviour that our suppliers are expected to follow when providing services or products. We have grouped these behaviours, following the ten principles of the United Nations Global Compact, into four groups: human rights, labour practices, environmental responsibility and sustainability and compliance.

The Suppliers' Code of Ethics is addressed to all suppliers of El Sardinero, S.A., any natural or legal person or other entity that provides services or sells products to El Sardinero, S.A.

Acceptance of this code is a prerequisite in all contracts that El Sardinero, S.A. enters into with its suppliers.

This code will be updated periodically and suppliers must be aware of its contents. Suppliers are responsible for ensuring that their employees or those with whom they contract to carry out the established legal relationship are aware of and comply with this code.

2. PRINCIPLES OF THE CODE OF ETHICS FOR SUPPLIERS

I. HUMAN RIGHTS

El Sardinero, S.A. is firmly committed to respecting human rights. It therefore promotes and expects its suppliers to commit to and comply with human rights in all its operations and in its supply chain..

II. ENVIRONMENTAL RESPONSIBILITY AND SUSTAINABILITY

Suppliers shall conduct their activities in an environmentally sound manner. The supplier is committed to operating in an environmentally responsible manner, minimising negative impacts on the environment and constantly seeking to improve its environmental practices.

III. ETHICS AND REGULATORY COMPLIANCE

Suppliers shall comply with the laws in force, respecting the legal and regulatory provisions applicable at all times.

IV. LABOUR PRACTISES

Suppliers ensure fair working conditions. Child, forced or compulsory labour shall not be used. Collective bargaining and free association of workers shall be respected. Discriminatory practices on the basis of race, sex, religion, sexual orientation or political affiliation shall be avoided. The applicable occupational health and safety regulations shall be complied with.

V. CONFIDENTIALITY

The information to which suppliers have access based on the legal relationship they maintain with El Sardinero, S.A. will be confidential. With regard to the storage and access of information, the provisions of current legislation and those established in the agreement between the supplier and El Sardinero, S.A. must be followed.

VI. FAIR COMPETITION

The activities carried out by suppliers must at all times respect free competition and avoid any practice that may constitute unfair competition, and in particular any collusive behaviour or strategy.

VII. ANTI-CORRUPTION

El Sardinero, S.A. is committed to the fight against corruption and will not tolerate any form of corruption or bribery. Our suppliers must adopt a zero tolerance stance towards corruption and comply with all applicable laws and regulations regarding the prevention of corruption. Suppliers shall ensure that they are committed to avoiding any activity that could be considered as corruption, bribery, influence peddling or facilitation payments..

VIII. CONFLICTS OF INTERESTS

Suppliers must act independently and transparently in their relations with El Sardinero, S.A., and to this end they must have internal procedures and procedures for verifying situations of real or potential conflicts of interest.

IX. PREVENTION OF MONEY LAUNDERING AND TERRORISM FUNDING

Suppliers shall cooperate and commit themselves to the prevention of money laundering and terrorist financing and shall take the necessary measures to avoid this risk.

3. ETHICS CHANNEL

Si como Proveedor observa cualquier conducta por parte de El Sardinero, S.A. que atenta contra los principios de este código o contra las disposiciones legales vigentes, puede, comunicarlo en el canal ético disponible en su página web.

4. COMPLIANCE MONITORING

Suppliers shall ensure internal monitoring of compliance with this code and shall inform El Sardinero, S.A. of any non-compliance with it, and shall likewise respond to any request for information on compliance with this code.

6. CONSULTATIONS

Questions that may arise in relation to the application or interpretation of this code can be addressed to compliance@armandoalvarez.com.

14. ACCEPTANCE

The Suppliers' Code of Ethics has been approved by the Board of Directors and any modification of the same will require the approval of said body.

This code will be reviewed and updated when necessary to adapt it to the new legal, social or economic reality at any given time.

EL SARDINERO, S.A.

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Santander

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HOYUELA

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GRAN HOTEL
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HOTEL
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Madrid

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