CORPORATE SOCIAL RESPONSIBILITY POLICY

Garden Hotels, a well known hotel chain located in the Balearic Islands and Andalucia, is aware of its needs to develop their ethical and environmental values, and communicate them to stakeholders and society in general, always attentive to our vision as a company and brand reference, differentiation of our products and our customer loyalty.

To develop its activities and services in accordance with respect for these values, is adopted this Social responsibility policy which aims at the sustainable development of the company, combining its economic development with social commitment and respect for the environment.

This policy is based on the following principles:

- Encourage personal, labour and social development of all workers of the company, encouraging training and especially those who are developing a work directly related to the environmental and social aspects of their activity. Rating the professional training of all of them and their dignified working conditions.

- Taking all appropriate measures to meet and promote all legislation and regulations in force in the field of environment, hygiene and labour risks, labor, financial aspects and human rights in our area.

- Encourage the communication with clients and other interested parts, looking for cooperation in the protection of the environment and promotion of the culture and traditions of our municipality.

- Reverse the economic development of the company in the community, valuing the hiring of local staff and the purchase of local products. Also involve suppliers and companies subcontracted in the adoption of environmental standards and quality of its products.

- Establish the measures necessary to understand, control and improve the environmental aspects of our activity. Reduce the consumption of natural resources by applying the best possible management and technology available, and encouraging in the generation of waste minimization and ensure proper management.

- Collaborate with the Administration as well as the entities or groups that promote better management of our environment and the benefits of the society in general.

- Develop each of these principles in a manner that suits the search for the maximum satisfaction of our customers and the continuous improvement of our services.

In order to ensure the proper development of this policy, Garden Hotels will be valued and to drive any deviation from the principles established here with the help of the recommendations of the environmental management system according to the ISO 14001:2015, TRAVELIFE system, as well as the sustainability of the GRI (Global Report Initiative) Guide.

The principles of this document are complemented with the corresponding annexs in regard to good labor practices and human rights concerns, support for the local community, Health and Safety, Environmental Policy and Quality Policy. These documents shall be subject to periodic review to stay current with changes in internal and external circumstances of the company and in line with the evolution of society.

Inca, 12th May, 2017

Gabriel Llobera

Vicepresidente Ejecutivo – Hotels y Aparthotels Garden

ENVIRONMENTAL POLICY

The group CESGARDEN S.L. (GARDEN HOTELS) carries out the management of tourist centres coordinating its economic progress with the protection of the environment and the prevention of pollution. The group conducts its business within the framework of a *sustainable development* that ensures future generations a thriving and healthy planet.

With this aim in mind, we are always eager to implement continuous and progressive environmental improvements in our activities, eradicating and reducing their impact on the environment, especially those which represent an irrational use of natural resources and energy, the deterioration of water, air, and land quality, and the destruction of nearby natural ecosystems.

CESGARDEN S.L. Senior Management makes the following undertakings:

1. To be directly involved in environmental management at all levels and to the maximum extent possible.

2. To ensure all applicable environmental regulations, and any other requirements the group undertakes to abide by, are complied with.

3. To regularly review and update the said Environmental Policy, in accordance with the commitment to continuous improvement.

4. To review the environmental practices of its suppliers and contractors, encouraging them to progressively adopt environmental criteria, especially with regard to the acquisition of materials and products that are environmentally-friendly.

5. To use natural resources in a controlled and rational way, especially energy and water.

6. To implement such measures as may be necessary in order to avoid or reduce pollution of the atmosphere, water, or land, as well the generation of waste.

7. To promote, not just the reduction of waste, but also its the re-use, recycling, and/or assessment, whether internally or through external management.

8. To protect the natural value of the surroundings.

9. To go further in its research into new technologies, so that any new technologies that may contribute to reducing our environmental impact may be introduced into our system, provided that they are economically viable, thereby ensuring continuous improvement in our environmental conduct.

10. To involve all staff in environmental management, enriching their environmental culture by providing the necessary training and through the day-to-day use of the tools of our environmental system.

11. To communicate to our clients and to other groups of interest our environmental action principles, engaging them in our management.

In order to ensure these aims and targets are met, CESGARDEN S.L. will provide all necessary human and material resources through the implementation and maintenance of the Environmental Management System in accordance with ISO standard 14001:2015 and the EMAS III Regulations at its establishments. In order to facilitate communication with social stakeholders, CESGARDEN S.L. will publish the environmental declaration for those establishments that have been verified under the EMAS III Regulations on its website.

Inca, 12 may 2017

Gabriel Llobera

Executive Vice Chairman of GARDEN HOTELS

EQUALITY POLICY

The Garden Hotels 'Management has defined the qualified policy oriented to get the customer and employee satisfaction. Learn about our goals will lead to the successful achievement.

This qualified policy is based on the following principles;

1. Improve the structure of the company by spreading the culture of quality based on establishing a system that allows monitoring, study, correction and improvement of all procedures carried out in the establishment.

2. Raising the awareness of staff to meet and even exceed these expectations of our customers, so as to achieve customer loyalty.

3. Obtain new opportunities by listening to the needs of the customer and the employee and thus increase the number of improvements thanks to information transmitted through complaints or suggestions.

4. The profitability of the business is our guarantee for the future. The strength of the Company is achieved generating an adequate level of benefits and giving the service required by the client.

5. Quality is the result of the participation of all and each of the employees.

To ensure the success of these principles, Garden Hotels has developed a Management Manual that includes instructions for each of the strategic processes of its activity, from operational reports in the proper hotel centres, being management, strategic, planning and support. These instructions are reviewed on a regular basis, and are communicated to executives, middle management and staff according to their responsibilities. GardenHotels has a quality Department which shall disseminate such instructions and promote their correct implementation.

Inca, 20th July, 2015

General Management
Garden Hotels and Aparthotels

GOOD LABOUR PRACTICES POLICY
AND
DEVELOPMENT OF HUMAN RIGHTS

Garden Hotels is aware of our influence in the compliance of Human Rights, therefore, and within the framework of our Corporate Social responsibility policy, we establish the following principles:

1. Comply with all laws and regulations in labour management.

2. Our employees will receive a decent wage, in accordance with the Collective Agreement and hospitality of the community and will work the number of correct hours, complying with the law of national employment.

3. Candidates for a job will not suffer any discrimination in the selection process during the development of their work once the contract has formalised.

4. The staff of Garden Hotels is free to join a Trade Union or similar organization established to protect and represent the rights of the employee.

5. The management will promote the contribution of extraordinary benefits to staff such as meals, lodging, or uniform washing according to their needs.

6. Encourages the development of staff in their jobs, improving their ability with opportunities for profesional training.

7. The management will seek to know the issues of the local community that may affect their lives and will ensure that their views are considered by decision of the company.

8. The protection of children and adolescent of abuse or sexual exploitation in tourism will be managed actively. Garden Hotels is committed to empowering the company staff to learn and behave accordingly to practices and policies for the protection of girls, boys and adolescents from commercial sexual exploitation. For the proper management and situations of this nature, presented to them in the exercise of activities, encouraging.

9. To act as preventive agents for this problem.

10. We appreciate our staff and we treat them fairly and respectfully by ensuring that we do not permit discrimination against anyone, regardless of age, sexuality, gender, ethnicity, religion, culture or disability.

11. We involve our staff on our sustainability commitments, so they understand their part in carrying out our objectives.

12. Monitoring sustainability indicates and relates to labour practices.

13. Hotels and lodgings are frequented by many types of different people, including customers, suppliers and staff. It is almost impossible to predict when a person commits human rights to another individual, it is important to understand how to manage this risk to ensure the protection of the well-being of vulnerable groups, including children, and ensure that they are treated fairly and respectfully without distinction of sexuality gender, age, ethnicity, religion or disability.

The global code of ethics for tourism of the UNWTO (World Tourism Organization) establishes that the exploitation of human beings, of any form, especially the sexual, and particularly when it affects children and adolescents, violates the fundamental aims of tourism and constitutes a denial of its essence.

Human rights are those basic freedoms inherent to all human beings. They are based on the principles that all humans, without distinction, have the universal right to be treated with dignity, equality and respect. The Universal Declaration of human rights identifies them as the 30 fundamental principles that were adopted by the General Assembly of the United Nations in 1948:

1. We are all born free and equal.	11. We are always innocent until proven guilty.	21. The Right to democracy
2. Do not discriminate	12. The Right to privacy	22. Social security
3. The Right to life	13. Freedom of movement	23. The Workers' Rights
4. No slavery	14. The Right to asylum	24. The Right to play
5. No torture	15. The Right to a nacionality	25. Food and accomodation for all
6. You have rights wherever you go	16. Marriage and family	
7. We are all equal in the eyes of the law	17. The Right to property	26. Right to education
8. The law protects your rights	18. Freedom of thought	27. Copyright
9. No unfair detainment	19. Freedom of speech	28. A fair and free world
10. The Right to a trial	20. The Right to public assembly	29. No one can take away your Human Rights

Inca, 20th July, 2015

Gabriel Llobera

Vicepresidente ejecutivo GARDEN HOTELS

C/ Menestrals, 5 · 07300 Inca. Mallorca. Illes Balears. España · T. (+34) 971 888 400 · F. (+34) 971 888 401

SAFETY AND HEALTH POLICY IN GARDEN HOTELS

Garden Hotels promises to protect the safety and health of our employees, customers, suppliers and subcontractors that develop services in our facilities, with the conviction that accidents and professional diseases can and should be avoided. Ensure the health and safety of these is a main aspect in the company.

1. Adopt the principle of continuous improvement of preventive action, which includes, among others, the activities for prevention and health protection, performance emergencies, adapting the working person, selection of teams and products, coordination between companies and other obligations under the regulatory framework of prevention. We consider the prevention of accidents as important as quality or productivity.

2. The company promotes and establishes the necessary means for communication of deficiencies and/or suggestions for improvement are analyzed and, if possible, applied. The spirit of participation, innovation and continuous improvement in the preventive field is critical to the future of our company.

3. Personell are the most important value to the company. For this reason they must be qualified and identified with the goals of our Organization and their opinions have to be considered. Training and information about risks, as well as the means and measures for its prevention are of Paramount importance and must reach all employees of the company.

4. The Prevention Plan is known by all staff, and the performance guidelines are specified. For the implementation and development of this Prevention Plan, the company has the employees participation representing them.

5. Our swimming pools facilities have staff monitoring and qualified first aid during the hours of more abundance, and these facilities are equipped with all the material and information resources required by the applicable regulations to ensure the safety of swimmers.

6. The Company is provided with a food security system to analyze and to evaluate the aspects for food hygiene refers, and carries out a series of procedures to avoid any incident that are to with food contamination. Kitchen and Restaurant Staff are regularly training for the handling of food by ensuring that the food processes are controlled.

7. The Companys' facilities meet the legal requirements that apply in industrial safety, since the achievement of preventive internal maintenance plan revisions and periodic inspections by competent bodies.

Inca, 20th July, 2015

Gabriel Llobera

Vicepresidente ejecutivo GARDEN HOTELS

POLICY SUPPORT TO THE LOCAL COMMUNITY

The Management of Garden Hotels according to the principles of its values, assumes responsibility for the impact that their company causes in the Local community and seek to influence positively in the communities in which we develop our activity, thus contributing to the sustainable development of the tourism destination.

The commitment of support to the local community is based on the following guidelines:

1. To choose actively the purchase of goods and services from local suppliers, as well as the acquisition of of local products as much as possible.

2. To encorauge the guests to visit places of interest, local restaurants, markets or handicraft centres, to enspire them to explore food, history, culture and traditions of the Country.

3. Advise guests how to dress or behave in the environment or locality, particularly when visiting places of cultural importance, or of special natural value.

4. Provide support to local educational institutions, promoting and supporting processes of technology transfer to primary and secondary schools, and collaborate with our equipment

5. Improve the impact of our activities in the next community further than the existing regulations (noise, smells, etc.).

6. Have indicators to monitor the impacts of their activities in its community.

7. Participate in activities that support social and community organizations, and communicate these internally to staff as well as customers making them participate to the extent possible if it is in their interest.

8. Generate and/or participate in partnerships with other companies or organizations to develop these actions in support of the community.

Inca, 20th July, 2015

General Management
Garden Hotels and Aparthotels