

CORPORATE SOCIAL RESPONSIBILITY POLICY

Garden Hotels

Garden Hotels, a hotel chain operating in the Balearic Islands and in Andalusia, is aware of the need to develop its ethical and environmental values and to be able to communicate these values to its stakeholders and society in general, with our vision as a company and as a benchmark brand ever present, along with the differentiation of our products and customer loyalty.

By developing our services and activities with respect for these values, we have adopted a Social Responsibility Policy that underpins the sustainable development of the company, combining economic growth with social commitment and respect for the environment.

The policy is based upon the following principles:

- ▶ Promoting the personal, professional and social development of every person working within the company, incentivising training, particularly of those members of staff who are carrying out an activity directly related to the social and environmental aspects of the business. Appreciating the professional ability of each and every person and ensuring decent working conditions.
- ▶ Adopting appropriate measures to understand, promote and comply with all the current regulations and legislation within our area of influence that refers to the environment, occupational health and safety, risk prevention, employment, finance and human rights.
- ▶ To promote communication with clients and stakeholders, seeking their cooperation in the field of environmental protection, circular economy, and in the promotion of the culture and traditions of the local communities in which we conduct our business.
- ▶ Reinvesting economic growth in the community, employing staff locally and purchasing local produce. Involving suppliers and sub-contractors in the circular economy and in providing consistency in the quality of their products.
- ▶ Establishing the measures needed to understand, control, and improve the environmental aspects of our activity. Reducing our consumption of natural resources and our carbon footprint by applying the best possible management techniques and using available technology. Encouraging minimal generation of waste products by extending the useful life of resources and ensuring the best choice of waste management.
- ▶ Working with local authorities and with entities or groups that promote better management of our environment and the consequent benefits to society as a whole.
- ▶ To develop each of these values in line with the desire to achieve maximum customer satisfaction and for continuous improvement of the services we provide.

With the aim of ensuring the correct development of this Policy, Garden Hotels will identify and redirect any deviation from the previously mentioned principles with assistance from the recommendations of the environmental management system according to the ISO 14001 regulations, from the TRAVELIFE sustainable hotel management system, and the company's own circular economy strategy. The development of these values and our performance data will be published annually in our Sustainability Memorandum, following the principles of GRI Standards (Global Reporting Initiative) and the Sustainable Development Goals (SDGs).

The principles contained in this document are supported by the corresponding annexes with regards to Good Employment Practices and Human Rights, Local Community Support, Health & Safety, Environmental Policy and our Quality Policy. These documents will be reviewed periodically to take into account any changes to the external or internal circumstances of the company or the evolution of society.

Inca, on the 1st of July 2021

Executive Vice-President - CEO Grupo Garden

ENVIRONMENTAL POLICY

Garden Hotels operates its tourism activities in a way that aims to achieve economic growth at the same time as protecting the environment and limiting contamination and generation of waste within the framework of *sustainable development*, thereby ensuring future generations inherit a healthy and prosperous planet.

With this in mind, it is willing to continuously and progressively, implement environmental improvements in its activities, avoiding or reducing the impact on the environment, especially when this involves an irrational use of energy and natural resources, a deterioration in water, air or soil quality, and the destruction of nearby natural eco-systems.

The Senior Management at Garden Hotels assume a commitment to:

1. Be directly and fully involved in environmental management at every level.
2. Guarantee compliance with all the requisites laid out in the applicable environmental legislation, as well as others to which it subscribes.
3. Review and periodically update the aforementioned Environmental Policy, in line with the commitment to constant improvement.
4. Review the environmental practices of suppliers and sub-contractors, promoting their progressive adoption of environmental criteria and the principles of the circular economy, with respect to the products they offer as well as to their own resource management.
5. Control and use natural resources in a rational manner, especially water and energy, aiming to optimise all usage.
6. Implement the necessary measures to avoid or reduce emissions into the atmosphere, water or soil, as well as reducing waste.
7. Promote a reduction in waste production, reusing, recycling and/or recovery of the same, whether that be at internal level or via external partners or management.
8. Protect and promote the value of the natural surroundings.
9. Study new technologies in depth so as to be able to incorporate into our system every opportunity that, being economically viable, can contribute to a reduction in our impact on the environment and therefore guarantee continuous improvement in our behaviour towards the environment.
10. Involve every member of staff in environmental management and the circular economy, increasing their environmental awareness with the necessary training and daily use of the tools that form part of our sustainability management system.
11. Inform our clients, and stakeholders, about our environmental principles, consequently involving them in our management.

To ensure we achieve our objectives, Garden Hotels will assign the necessary human and material resources, using the implementation and maintenance of the Environmental Management Systems in accordance with the **ISO 14001** standards and/or the **EMAS Regulations** in its establishments, and follow the principles of the **Circular Economy Strategy** adopted by the company and certified by an accredited external agency. To facilitate communication with stakeholders, Garden Hotels will make the Environmental Declaration of the establishments available to the public, verified according to the EMAS Regulations, on its website.

Inca, 10th of November 2021

Gabriel Llobera 
Executive Vice-President – CEO Garden Group

QUALITY POLICY

The Garden Hotels management has defined its quality policy intending to achieve both client and employee satisfaction. Understanding our goals means we can achieve them satisfactorily. Our quality policy is based on the following principles.

- **Improving our business structure:** promoting a culture of quality by implementing a system that allows us to monitor, study, correct, and improve all the processes we use at our establishment.
- **Promoting a positive working environment:** we promote participative management and teamwork by offering continuous training programmes and learning opportunities for our staff. Generating a healthy working environment is everyone's responsibility within the grand Garden Hotels family.
- **Satisfaction awareness:** everyone generates quality, and we must maintain a spirit of continuous improvement. To ensure loyalty from our clients, we must provide a standard of excellence in our services, taking special care of the little details, ensuring friendly service, empathy, and above all, service with a SMILE.
- **New opportunities and continuous improvement:** we like to hear our clients' and employees' opinions and we can increase the number of improvements implemented thanks to the information received first-hand through suggestions and complaints, allowing us to measure the quality we provide in a realistic and committed manner.
- **Guaranteeing service and product quality:** we are committed to improvement and providing quality products and services at every one of our establishments. Quality is the result of the participation of every member of our staff.
- **Management system:** we continuously update our audits and adhere to the manuals and recommended procedures to carry them out correctly.

To guarantee the success of these principles, Garden Hotels has developed a Management Manual that contains the instructions for every process involved in its business activities, from operational processes in the hotels themselves to management processes, strategies and planning, and support procedures. These instructions are reviewed periodically, and communicated to managers, supervisors, and staff, in line with their responsibilities.

Garden Hotels has a Quality Department that ensures the communication of these instructions and promotes their correct implementation.

In Inca, on the 31st of March 2022

General Manager
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:

- Comply with all laws and regulations in labour management.
- 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.
- Candidates for a job will not suffer any discrimination in the selection process during the development of their work once the contract has formalised.
- 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.
- The management will promote the contribution of extraordinary benefits to staff such as meals, lodging, or uniform washing according to their needs.
- Encourages the development of staff in their jobs, improving their ability with opportunities for professional training.
- 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.
- 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 to act as preventive agents for this problem.
- 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
- We involve our staff on our sustainability commitments, so they understand their part in carrying out our objectives.
- Monitoring sustainability indicates and relates to labour practices

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 nationality	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

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.

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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

General Management
Garden Hotels and Aparthotels

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:

- To choose actively the purchase of goods and services from local suppliers, as well as the acquisition of local products as much as possible.
- To encourage the guests to visit places of interest, local restaurants, markets or handicraft centres, to inspire them to explore food, history, culture and traditions of the Country.
- Advise guests how to dress or behave in the environment or locality, particularly when visiting places of cultural importance, or of special natural value.
- Provide support to local educational institutions, promoting and supporting processes of technology transfer to primary and secondary schools, and collaborate with our equipment
- Improve the impact of our activities in the next community further than the existing regulations (noise, smells, etc.).
- Have indicators to monitor the impacts of their activities in its community.
- 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.
- 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