

BEST HOTELS CODE OF ETHICS

The company BEST HOTELS S.L., holds the operational management of establishments of tourist accommodation in any of its modalities. The merchant has worked and works on a growth and expansion model based on the QUALITY OF THE SERVICES and in the SOCIAL COMMITMENT with the PEOPLE who deal with the company either as employees, customers or suppliers.

The company is the owner of the BEST HOTELS brand, under which the companies that own tourist establishments to which it provides the aforementioned management services.

For BEST HOTELS S.L. the basis of our daily work is the commitment to values of Quality, Integrity, Transparency, Social Responsibility and Environmental and Customer Orientation.

The present ethical code, has the purpose of determining the COMPANY POLICY and BUSINESS VALUES by which the conduct and decision-making should be governed decisions. These will be general principles that should inform the actions of all members of the organization and who define a model of conduct business that will operate based on recommendations, guidelines, guidelines and a catalog of desired behaviors, both in its scope and in the required to mercantile companies that own establishments that operate under the BEST HOTELS brand.

All providers must be aware of said CODE OF ETHICS, clients, tenants of services and employees who work for the owner of the BEST HOTELS brand and also, all those natural or legal persons that for one reason or another they maintain contractual relationships, either in the field of labor, commercial or consumer with the mercantile companies that operate under said brand.

Therefore, the purpose of the code is to express the will of the company that the behavior of all those involved with the company are ethical, in addition to requiring strict regulatory compliance in all areas and a culture of prevention and surveillance of behaviors that may involve criminal responsibility.

This Code of Ethics lacks the claim of "organization and management model" defined in article 31 bis.5 of the current Penal Code. Therefore, It will only have the effects of declaration of will and a first approach to the culture of "criminal compliance" for its future implementation planned to which we will refer.

I. SCOPE OF APPLICATION AND PUBLICATION.

This Code of Ethics is binding, of mandatory knowledge and, applicable to the all the employees, managers and collaborators of Best Hotels S.L., including the members of the administrative bodies and, likewise, those of all the mercantile owners of hotel establishments.

It is also mandatory knowledge and compliance for customers, partners suppliers and any natural or legal persons, to the extent that maintain some type of link or legal relationship with Best Hotels S.L. or with any of the mercantile owners of the establishments that operate under the BEST HOTELS brand.

The Administrative Body will determine by regulation the elaboration, design and communication of a Management Protocol for the cases in which it is reported a communication of an alleged irregular conduct, contrary to the Code of Ethics.

The aforementioned protocol will establish the procedure for reporting irregularities and, in turn, the way in which the reported should be managed.

This Code of Ethics is published and disseminated through the website www.besthotels.es

II. SERVICE PROVIDERS AND SUPPLIERS

All the tenants of goods or services and suppliers that maintain a commercial relationship with Best Hotels S.L. or with the companies holding. The hotels will be obliged to strictly comply with labor matters, health and safety, tax and Social Security obligations.

Said providers of goods or services and suppliers will be aware of this code of ethics and, in its relations with employees, managers, other collaborators and clients, will respect what is established in it.

Food suppliers will strictly comply with the regulations of elaboration, manufacturing and current health and must undergo the controls mandatory. The suppliers of materials will comply with the regulations applicable to the corresponding material and distribution. All of them will be required to expressly accept this Code of Ethics that will integrate any other existing agreements and that will be considered mandatory compliance and enforceable for all purposes provided for in Law.

COMMITMENTS

1.- COMMITMENT TO SAFETY AT WORK, EQUALITY OF OPPORTUNITIES, COMPLIANCE WITH LABOR RIGHTS AND WITH HONESTY IN BUSINESS

The mercantile Best Hotels S.L. expresses the commitment to strict compliance with labor, safety and hygiene at work and social security regulations. With this code of ethics, as well as in the corresponding contracts, it requires that the owners of establishments to which it provides its services, comply strictly with said regulations. Best Hotels S.L. and all the companies operating under the BEST HOTELS brand, have their corresponding Plan of Prevention of occupational hazards.

Best Hotels S.L., attaches fundamental importance to the work environment and expresses its total rejection of any behavior that violates the dignity and the honor of employees and rejects all discriminatory conduct, harassment labor or sexual, insults and / or slander.

1.1 BEST HOTELS S.L. has a code of ethics and a protocol against SEXUAL harassment and BY REASON OF SEX, MORALITY AND VIOLENCE AT WORK that must be respected by all employees and service providers.

Likewise, the owners of establishments that operate under the BEST HOTELS Brand, will have the aforementioned protocols and ethical codes of analogous nature and, they must ensure its compliance, being the commitment of Best Hotels will not allow any Tourist Establishment that obviates or is devoid of said protocols, it operates under the BEST HOTELS brand.

1.2 Regarding Equality BEST HOTELS is committed to complying with of the commitment to EQUAL PAYMENT between men and women and, In accordance with this, it has not only implemented the past April 14, 2021 the procedures provided for in the Royal Decree 902/2020 of October 13, but will follow an active policy of control and fulfillment of the purpose of the aforementioned decree.

1.3 In terms of EQUALITY and how could it be otherwise, the mercantile BEST HOTELS, S.L. has agreed through its Administrative Body and, Steering Committee, the application and implementation of the EQUALITY PLAN created by Royal Decree 6/2019 of March 22, establishing a commissioning "early" march in anticipation of the entry into force of the standard.

In general, companies that operate under the BEST HOTELS brand or related to them commercially and, that they are obliged to have an Equality Plan in accordance with the provisions of Organic Law 3/2007, of March 22, for equality effective number of women and men will have it, having agreed a simultaneous start-up before the entry into force of the Royal Decree that order its implementation.

Best Hotels states that in its company employees must work as a team in order to achieve the required objectives and maintain a cordial and respectful relationship.

In no case, employees, regardless of the position they hold, take advantage of their position in order to achieve personal benefits or in favor of a third party, having to work in the interest of the company and in order to fulfill the functions assigned.

Similarly, they will not offer benefits to external companies in your benefit or that of a third party, in breach of your obligations. This obligation extends to all collaborators, regardless of the nature of the relationship contract and to employees and collaborators of tourist establishments that operate under the BEST HOTELS brand.

Best Hotels S.L. performs the selection of personnel, assignment and promotion of positions objectively and respecting equal opportunities and requires that in the same way, the owners of tourist establishments operate under the brand.

Employees must strictly comply with the recommendations of health and safety carried out by Best Hotels S.L. Likewise, Best Hotels S.L., requires to the owners of the chain's tourist establishments that carry out the same requirement to its employees in compliance with their respective plans and protocols.

All mercantile companies will provide the required means so that the employees comply with health and safety recommendations.

Best Hotels S.L. and the companies that own the establishments that operate under this brand, must respect the labor or Social Security conditions and, therefore, the rights recognized by legal provisions, collective agreements or individual contracts.

Likewise, employees will have this Code of Ethics and must be aware of it and respect what is established in it. Best Hotels S.L. absolutely rejects Behaviors contrary to what is described in this Code of Ethics.

2.- COMMITMENT TO QUALITY AND ATTENTION TO THE CONSUMER

The clients of the establishments that operate under the BEST HOTELS brand are and should be the highest priority of your merchant store owners tourist. To this end, they must conduct surveillance and provide guidelines convenient for your employees to properly serve customers, must comply at all times, with the applicable consumer regulations.

In order to guarantee the adequate provision of services, the establishments that operate under the BEST HOTELS brand, they must have the services and required facilities according to their category. Likewise, the owners of the establishments must guarantee the security and accessibility of their establishments.

These guidelines should be interpreted as a starting point and not as an end, having to exceed them by far, trying and achieving excellence.

Best Hotels S.L., carries out a truthful advertising of the services provided by the establishments that operate under the BEST HOTELS brand.

Best Hotels S.L. manifests absolute rejection of conduct and / or promotion or incitement of violent, hostile or discriminatory, humiliating behavior, of discrediting or disparaging for racist, anti-Semitic or other reasons regarding the ideology, religion or belief, family situation, ethnicity, race or nation or your national origin, your sex, orientation or sexual identity, for reasons of gender, illness or disability, by employees,

managers or administrators, towards clients or other employees. Said prohibitions of Unwanted behaviors by Best Hotels S.L., are required of companies owners of the hotels.

Similarly, Best Hotels S.L. expresses its rejection of said behaviors when they come from the clients of this company or those who operate under the BEST HOTELS brand, carried out against other clients or employees.

3. COMMITMENT TO THE SAFETY AND HEALTH OF CUSTOMERS

The establishments that operate under the BEST HOTELS brand must comply strictly with all current health regulations and require and must require compliance with established protocols for its employees. The establishments must carry out controls and verifications of the preparation of food, swimming pool water and control of critical points.

The facilities of such establishments must strictly comply with the applicable regulations on safety and fire protection and with any other applicable regulations that guarantee security in said facilities.

The swimming pools of the establishments must have a lifeguard service mandatory and comply with the legally required security measures. In the assumptions in which the law provides for it, the establishments must have security and surveillance personnel and, if not mandatory, personnel who carry out control functions in order to request assistance from the Security Forces and Bodies in cases where the situation requires it.

3.1 CUSTOMER CONDUCT

The establishments that operate under the BEST HOTELS brand will not allow conduct that violates the rights of other clients or the establishment, its employees and collaborators. In such cases, the

The establishment will exercise its right to request help from the Security Forces and Bodies in order to proceed with the eviction and, in the event that said clients were engaging in conduct that could constitute a crime, to report such events.

4. COMMITMENT TO THE FIGHT AGAINST MONEY LAUNDERING AND COUNTERFEITING OF CURRENCY

Best Hotels S.L., and the companies that operate under the BEST HOTELS Brand strictly comply with Law 10/2010, of April 28, on the prevention of money laundering and terrorist financing.

All the employees of Best Hotels S.L. and the companies holding hotels that operate under the BEST HOTELS brand, when they receive currency in metal or paper in good faith, false and proven to be false, they must refrain from its use, having to report the facts to the competent authority. Throughout In this case, employees must check the authenticity of the coin at the assumption of payment in cash.

The mercantile Best Hotels S.L. and the owners of hotels that operate under the Brand BEST HOTELS must make sufficient means available to their employees for such identification.

The employees of Best Hotels S.L. and the companies that own hotels under the BEST HOTELS brand should refrain from charging amounts on credit cards or debit or cash traveller's checks, when they have knowledge of their falsity, having to inform the competent authorities of said facts.

5. COMMITMENT TO RESPECT THE ENVIRONMENT

Best Hotels S.L. and the companies that own establishments that operate under the BEST HOTELS brand, they must comply with the regulations applicable to the production of waste and any other related to the environment applicable to the activity.

6. COMMITMENT TO COMPLY WITH LEGAL AND TAX OBLIGATIONS AND SOCIAL SECURITY

Another of the commitments of Best Hotels S.L. is the fulfillment of the whole of applicable regulations on tax and Social Security matters.

For this reason, it requires the companies that own the establishments that operate under the brand such compliance and, where appropriate, to which they may conform Group of Companies to which the company Best Hotels S.L., of in accordance with the definition made by Royal Legislative Decree 1/2010, of July 2, which approves the revised text of the Companies Law of Capital and the Royal Decree of August 22, 1885, by which the Commercial Code, to the rest of the companies that make up the group.

Best Hotels S.L., the companies that belong to the Group as defined above and, the holding companies under the BEST HOTELS brand, must have specialized advice in these matters and comply with the recommendations made to ensure compliance with regulations.

In no case the administrators, directors or employees of Best Hotels S.L., nor the holding companies that operate under the BEST HOTELS brand, will obtain for himself or for another the enjoyment of benefits from the Social Security System, his undue prolongation or facilitate others to obtain it, through a caused error through simulation or misrepresentation of facts, or the conscious concealment of facts of which they have the duty to report.

Subsidies or grants from Public Administrations obtained by the mercantile Best Hotels S.L. and those that operate under the BEST HOTELS brand are and must be obtained with the utmost respect for the conditions required for their concession and acting with maximum transparency.

7. COMMITMENT TO RESPECT DATA PROTECTION PERSONAL

BEST HOTELS S.L., as administrative manager of the companies that own the establishments that operate under the BEST HOTELS Brand has always had outsourced advisory services contracted for compliance with current regulations on data protection, which have provided the necessary training to the staff of Best Hotels S.L. and to the companies that own the hotels, have carried out the required audits or have provided status reports when the audit has not been legally required.

Likewise, these services have proposed the implementation of all procedures and documents necessary to comply with the regulations of mandatory data protection.

The company has followed the instructions and advice given by said consultancies and has demanded that its staff comply with what is informed in the training received.

At present, Best Hotels S.L., has signed a contract with "Crowe Accelera Management S.L. ", a company designated as Delegate for Data Protection and that provides the services corresponding to said figure, also, of support, supervision, advice and guarantee of compliance with the REGULATION (EU)

2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016 regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and

by which the Directive 95/46 / CE (General Data Protection Regulation) and Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights.

8. COMMITMENT TO RESPECT URBAN REGULATIONS

Best Hotels S.L. and the mercantile owners of the establishments that operate under the BEST HOTELS brand that, likewise, are promoters of the construction of buildings and works must strictly comply with urban regulations and applicable administrative and, especially, they must refrain from the construction or Unauthorized buildings on land intended for roads, green areas, property of public domain or places that are legally or administratively recognized landscape, ecological, artistic, historical or cultural value or undeveloped land.

9. COMMITMENT TO COMPLIANCE WITH OBLIGATIONS IN CORPORATE MATTER

The annual accounts and all the documents that reflect the legal situation or economic of Best Hotels S.L. and hotel operating companies, they reflect the reality of these. The resolutions adopted at the Shareholders' Meeting or in the administrative body of said companies are for the exclusive benefit of society and all partners.

The partners can exercise their right to information, participation in the management or control of social activity within the limits established in the Law of Capital companies. The agreements are adopted by royal majorities and it is attributed to whoever legally has it.

10. COMMITMENT IN RELATIONS WITH THE PUBLIC SERVICE

The employees, directors and administrators of the company Best Hotels S.L. and the of the companies owning establishments that operate under the BEST HOTELS Brand, in its relations with the authority, public officials or people who participate in the exercise of public function, will not offer or deliver in any supposed gift or remuneration of any kind so that he does not make or delay the Duties inherent to the position of said officials. Nor will they deliver a gift or remuneration at the request of said authority, public official or person who participates in the exercise of public function.

The employees, directors and administrators of the company Best Hotels S.L. and of The owners of establishments that operate under the BEST HOTELS brand will refrain from influencing public officials or authorities, taking advantage of any situation derived from his personal relationship with him or with another public official or authority to achieve a resolution that can generate direct or indirectly an economic benefit for himself or for a third party.

Likewise, the employees, directors and administrators of the company Best Hotels S.L. and those of the companies that own establishments under the BEST HOTELS brand, will refrain from requesting remuneration, gifts or presents as compensation to influence public officials or authorities to achieve a resolution that directly or indirectly generates an economic benefit, for themselves or for a third party. Best Hotels, and the companies that operate under the BEST HOTELS brand reject such acts.

11. COMMITMENT TO RESPECT INDUSTRIAL PROPERTY RIGHTS

Best Hotels S.L., as administrative manager of the operators of hotels that operate under the BEST HOTELS brand, manages the registration of signs badges. The companies that operate under the BEST HOTELS brand are authorized to use the legally registered distinctive signs whose ownership or those whose use has been assigned by the owner.

12 COMMITMENT TO REGULATORY COMPLIANCE POLICIES.

Best Hotels has a firm commitment to regulatory compliance in all its present and future aspects as it is considered as BUSINESS VALUE of first level the subjection to any norms that add value to the protection of the company, its managers and workers.

For this reason, the GENERAL MEETING OF MEMBERS JULY 2020, under the order of On that day, it agreed to approve the PROPOSED AGREEMENT OF PUBLIC STATEMENT AND COMMITMENT OF THE CORPORATE WILL OF "Establish the protocols or procedures that specify the training process of the will of the legal person, decision-making and execution of the same in relation to those." All in accordance with the determinations of Article 31.bis of the Current Penal Code and Article 226.1 of the Capital Companies Law.

The purpose is that both Best Hotels as a manager of tourist farms as well as, the holding companies or owners thereof, are in a position to prove the highest level of regulatory compliance and prevention of any conduct contrary to it.

That is why it undertakes to start up within a year of a effective "Criminal Risk Prevention Plan" to implement any latent risk mitigation measures. However, Best Hotels already has a "complaints channel", to facilitate that any natural or legal person can formulate recommendations, complaints or reports related to this code of ethics and, when the aforementioned "Risk Prevention Plan Penalties", in compliance with the same. Likewise, said "complaints channel" has as a purpose to comply with other sectoral regulations, among others and, without limiting nature, to Directive 2019/1937 of the European Parliament. Said complaints channel consists of the email address "Canal.confidencial@besthotels.es" received by the general director of compliance normative Mr. Guillermo Herrero Álvarez. This channel guarantees the confidentiality of complaints.

Drafting on May 10, 2021

Signed by the Sole administrator

Mr. Guillermo Herrero Álvarez