



# CODE OF ETHICS AND SUSTAINABILITY COMMITMENTS

RESPONSIBILITY IN MOTION  
FOR A BETTER TOMORROW

BUSINESS

PEOPLE

ENVIRONMENT

HUMAN RIGHTS

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# Message from the President

## Living up to our commitments



**“Together, we have become the fastest-growing value-for-money hotel chain in Europe, driven by our unwavering commitment to making sustainable stay accessible to everyone.”**

I want to take a moment to reflect on our remarkable journey over the past 35 years. Our ability to adapt to a fast-paced and challenging environment sets us apart, and I am immensely proud of what we have achieved.

Today, I want to emphasise what truly matters - our core values. At B&B HOTELS, we stand for entrepreneurship, uniquely rooted in our DNA, showing genuine care, always promoting simplicity, naturally embracing differences, with high ethical standards as a foundation and sustainability as our compass. These principles define who we are and guide us in every decision we make.

Our responsibility extends beyond the boundaries of our organisation.

**We owe it to our clients, co-workers, hoteliers entrepreneurs, shareholders, business partners, and all our stakeholders to act responsibly and ethically. To ensure we live up to these commitments, I am glad to introduce Our Sustainability Commitments - a practical guide that empowers everyone of us to do the right thing, every single day.**

As we embark on this new chapter, I want to express my gratitude for your dedication and passion, which have been essential to our success so far. I encourage you to embrace open dialogue, where everyone's voice is heard and valued. Speak up, share your concerns, seek guidance, and actively contribute to shaping our ethical practices. It is together, as a united team, that we will make a real and lasting difference.

I have full confidence in our ability to walk the talk and live by the standards we have set forth. Your continued commitment will be the driving force behind our sustainable success.

Thank you for being part of our sustainable journey.

Fabrice Collet

*President of B&B HOTELS*



# Message from the CEO

## Living up to our commitments



**“Our commitment goes beyond a moral imperative: it is the foundation upon which the sustainability and lasting success of B&B HOTELS is built. We firmly believe that integrity, transparency, and respect for human rights are not only legal or ethical obligations, but also powerful drivers for building a resilient and exemplary company.”**

As members of the Executive Committee of the B&B HOTELS Group, we are honored and responsible for guiding the strategy and operations of our company around the world. This role demands more than just rigorous management: it calls on us to embody, each and every day, the principles of the Code of Ethics that define our collective identity.

We are fully aware that our personal example is key to inspiring and rallying all employees around these fundamental values. By demonstrating, through our daily actions, the practical application of these ethical principles, we strengthen trust within the Group and with our external partners.

Together, we are committed to:

- Clearly and confidently communicate the principles of the Code of Ethics to all our teams.
- Lead by example by embodying the expected behaviors with consistency at every level of our organization.
- Ensure that these principles are integrated into every strategic and operational decision.

It is by uniting around this shared commitment that we will continue to write the story of B&B HOTELS with pride, ambition, and responsibility.

Céline Vercollier  
*Group Chief Executive Officer of B&B HOTELS*

# What ethics mean for us

Doing the right thing

Being ethical at B&B HOTELS means that as a company and as a community,

**we are sharing a common sense of purpose.**



# What we stand for

## Our core values

**At B&B HOTELS, we are deeply aware of our responsibility towards our employees, our customers, our partners, and our planet.**

That's why what we promise, we deliver:

- Always providing the best value and quality to our customers,
- Fostering a positive work environment in which our people can flourish, and
- Moving our ESG/CSR initiatives forward.

**At B&B HOTELS, we aim to make life as pleasant, easy, and flexible as possible for everyone. Because that's how we think life should be lived.**

That's why we're constantly creating solutions that are simple, smart, and tailored to meet individual needs. This means we're always able to offer our customers a hospitality experience packed with great value at affordable rates while simplifying our co-workers' day-to-day.

**SMART  
SIMPLICITY**  
WE MAKE IT  
SIMPLE

**INTEGRITY**  
WE TAKE  
RESPONSIBILITY

**ENTREPRENEURSHIP**  
WE GROW  
TOGETHER

**At B&B HOTELS, we are entrepreneurs and passionate doers, we constantly work to grow and improve.**

Passion drives our efforts to exceed customer expectations in everything we do, and we are always committed to the highest standards. For us, challenges are opportunities we take on wholeheartedly, blazing trails with innovative solutions to satisfy new market needs. And because we love to co-create, we move forward hand in hand with all our people, co-workers, customers, and partners, to shape the future of hospitality – together.

**EMPATHY**  
WE CARE  
FOR PEOPLE

**INCLUSION**  
WE CELEBRATE  
DIVERSITY

**At B&B HOTELS, we love meeting new people and giving all our warmest welcome, with humanity and kindness, as one humankind.**

We like getting to know all of our people – and by our people, we mean employees, customers, and partners. We invest in lasting relationships and give each our utmost attention. We know we are nothing without all of our people. Being acutely aware of their contributions to our business' success we continuously show our sincere appreciation.

**At B&B HOTELS, we embrace our differences because they're what make us strong, enriching us both individually and as a group.**

That's why we welcome everyone as they are. Because we believe it is the best way to build a highly creative culture needed to answer to the fast-paced changes in our world and markets.

# What we strive to

## Our CSR Strategy

### A hospitable path to a more sustainable future



# Integrity at the core

## Building a better future

This document sets out the principles that guide our journey by proclaiming who we are and defining our standards of business integrity. It contains the necessary information, resources and tools to define what ethical and appropriate conduct is and outlines what we should expect from our stakeholders and what they should expect from us.

### Why do we have a Code of Ethics?

Our Code of Ethics is our daily guide. It helps us understand what is expected of each of us as a member of the B&B HOTELS Group and identifies areas that require special attention so that we can honor our demanding Ethical Principles and commitments.

The Group operates in many countries, representing different cultural and legal environments. Whether as a company or as an individual, compliance with the laws and regulations of the countries in which the Group operates is fundamental. The Code of Ethics helps us ensure that we apply the same ethical standards wherever we operate.



B&B HOTEL, Paris Porte des Lilas, France

B&B HOTEL, Rio de Janeiro Copacabana Forte, Brazil



### Who does the code apply to?

The Code of Ethics applies to all employees of the B&B HOTELS Group and its subsidiaries worldwide. It also applies to all corporate officers and members of the Group's Executive Committee and Management Committees. The Code of Ethics also applies to our hotelier entrepreneurs. We seek out and promote business partners who share our ethical standards, as described in this Code, regarding human rights, working conditions, respect for the environment, and business integrity. We are committed to helping them achieve these standards, while having the courage, if necessary, to end our relationships with those who do not wish to achieve them.

### What are our responsibilities?

#### BE COMMITTED.

Make sure to uphold the highest standard of ethical conduct in every action we take or decision we make.

#### KNOW THE RULES.

Read and understand the Code. It may be updated from time to time to reflect changes in the law. Make sure you check the [online version](#). Learn the details of policies applicable to your job. In addition to the Code, B&B HOTELS has other policies that apply to various aspects of your job.

#### ASK QUESTIONS & SEEK GUIDANCE.

If you have any questions regarding anything in the Code or the policies, you must raise those questions promptly with your manager, your HR business partner or your Legal and Compliance Officer.

#### REPORT ISSUES OR CONCERNS.

Promptly raise any concerns about any actual or potential violations of the Code with the appropriate people within our organisation - your manager, your HR business partner or your Legal and Compliance Officer - or using two secure and confidential channels, the local alert line or the alert platform ([refer to this section](#)).

#### COOPERATE WITH COMPLIANCE INVESTIGATIONS.

Reports of potential violations of the Code will lead to an investigation. It is your duty to cooperate with any compliance investigation to the fullest extent, and to always tell the complete truth to those investigating the problem.



**If you are faced with a concern or issue and are unsure what to do, consider the following questions:**

- 1** Is it lawful?
- 2** Is it compliant with our Code and policies?
- 3** Is it consistent with our values and corporate commitments?
- 4** How would it look if it were reported on the news or in another public forum? Would my reputation or the Company's be negatively affected?
- 5** Could someone perceive this as a conflict of interest?
- 6** Could my action (or inaction) put anyone's health, safety or well-being at risk or have a negative impact on the environment and/or local communities?

If the answer is 'no' (questions 1 to 3) or 'yes' (questions 4 to 6), or you are not sure, you should always talk to someone, your manager, your HR business partner, your Legal and Compliance Officer, who will be able to provide you with support and guidance.



B&B HOTEL, Palermo, Italy

## How to use this code?

To support all employees in the successful completion of their missions in accordance with the Group's ethical and sustainability rules and principles, Managers have the specific responsibility of embodying the Group's values and ethical and sustainability through their personal example and ensuring the proper application and compliance of the Code of Ethics by their teams. They are responsible for disseminating the Group's key messages and best practices.

They are on the front lines, providing a listening ear and supporting their teams in the event of ethical questions or dilemmas, encouraging the free expression of their doubts and concerns.

As the world evolves rapidly, we must update this code regularly; the Code of Ethics may be amended at any time, whenever deemed necessary.



## How do we cultivate a culture of integrity?

At B&B HOTELS, we place a strong emphasis on continually developing our employees through regular training sessions. These sessions cover important topics such as compliance, data protection, cyber security, and Corporate Social Responsibility (CSR).

We use a combination of e-learning modules and face-to-face sessions to ensure effective and comprehensive training, promoting a culture of transparency and ethical conduct. This approach guarantees that our employees receive engaging and in-depth instruction.

By providing these valuable opportunities, we empower our employees to strengthen their skills and knowledge, fostering personal growth and contributing significantly to the overall success of our company while upholding the principles of integrity in every aspect of our operations.

# Speaking up

## Alert mechanisms

Being able to quickly identify ethical breaches is essential to ensuring compliance with our Code of Ethics and values in all the countries in which we operate. We encourage a culture of dialogue among our employees and all our partners can express their concerns.

### Examples of our ethical concerns:

- Violence
- Abuse of power
- Discrimination
- Moral harassment
- Sexual harassment
- Corruption and other breaches of integrity
- Racism
- Attacks on the Group's interests



### How do I file a report?



#### DIGITAL ALERT PLATFORM

Secure website:  
<https://bbhotels.signalement.net/>

13 languages / for everybody,  
even the external members.

**Anonymous reporting is  
absolutely possible.**



#### A LOCAL ALERT LINE

Company code: 1990

Austria, +43 720 022446 - Belgium, +32 78 48 27 57 - Brazil, +5511 4210-5189 - Czechia, +420 296 182 801 - Denmark, +45 80 25 42 52 - France, +33 1 76 75 31 33 - Germany, 0800 1814419 - Hungary, +36 21 211 1482 - Italy, 800 828 454 - Netherlands, +31 20 262 1742 - Poland, +48 22 292 29 07 - Portugal, +351 304 500 228 - Slovenia, +386 1 777 45 47 - Spain, +34 518 88 05 71 - Switzerland, +41 22 501 7054 - United Kingdom, +44 808 273 5257 - United States of America, +1 (800) 867-9145



Our system allows internal and external stakeholders of the B&B HOTELS Group to express their concerns so that the Group can treat them.

**TALK ABOUT IT  
TO MAKE PROGRESS**



**RESPECT OUR  
RESPONSIBILITIES**

## Speaking up principles

- Confidentiality
- Equal treatment
- Protection of whistleblowers against any form of retribution
- Responsibility
- Respect for privacy
- Compliance with the European Data Protection Regulation
- Responsiveness in emergencies

The B&B HOTELS Group prohibits all forms of retaliation against any employee who uses the internal whistleblowing system to express their concerns in good faith.



B&B HOTEL, Palermo, Italy



B&B HOTEL, Antwerp, Belgium

## Key steps in managing a report

STEP

01

### RECEPTION

Acknowledgment of receipt and request for additional documents if necessary. Any reports that are not submitted through the official page will not be considered as official reports.

STEP

02

### PLAUSIBILITY CHECK

The Group Compliance Director assesses if the allegations fall within the scope of the reporting management policy.

STEP

03

### INVESTIGATION / SURVEY

An investigation is being conducted to highlight on the materiality and legal justification of the alleged facts.

Depending on the complexity of the facts, this can take several months.

STEP

04

### INVESTIGATION REPORT AND CORRECTIVE ACTIONS

An investigation report closes the filed report. Appropriate corrective measures may be taken.

STEP

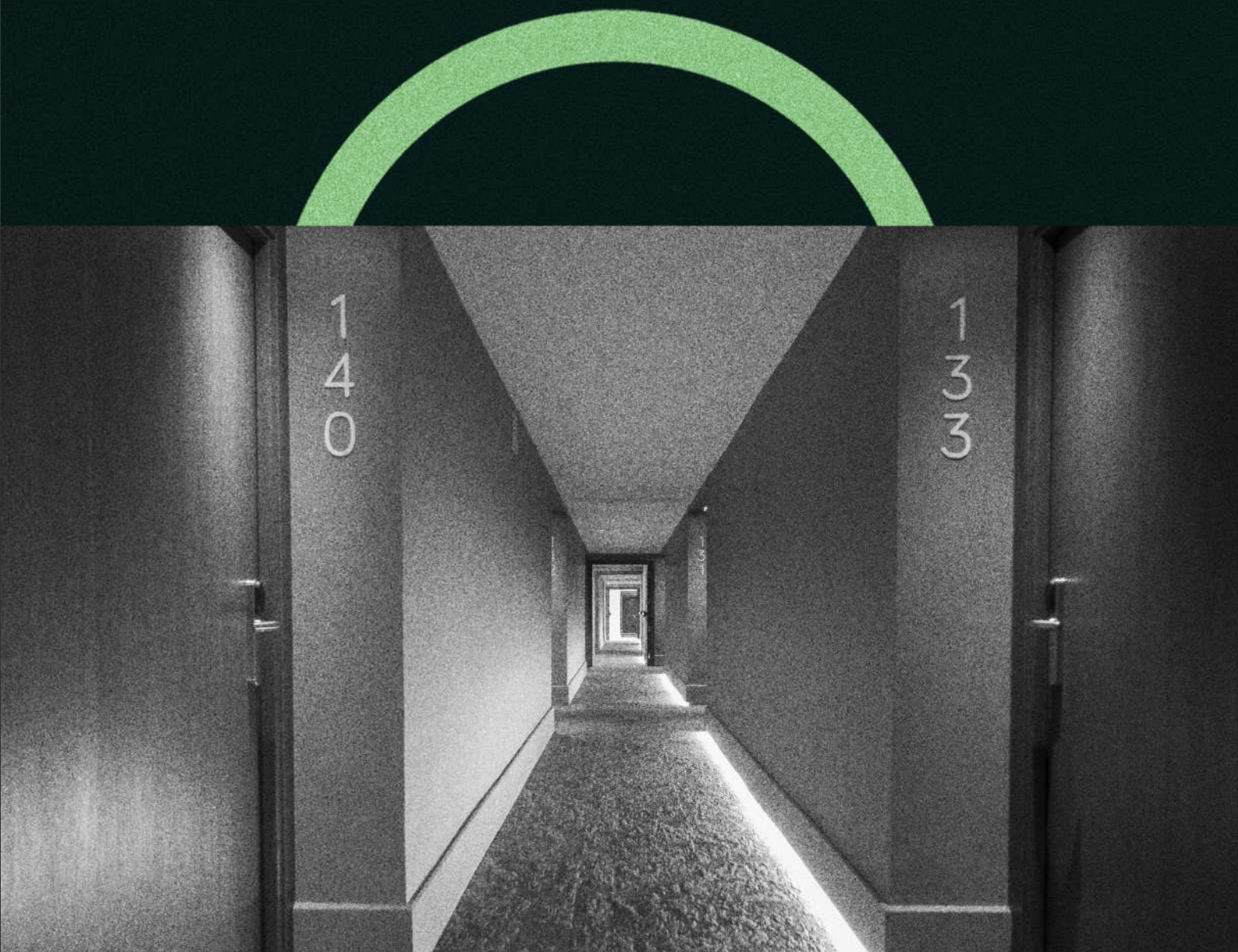
05

### FOLLOW-UP

The whistleblower is contacted and corrective measures will be followed.



# #1 BUSINESS RESPECTING BUSINESS RULES & ETHICS



**1.1** Compliance with  
all applicable laws

**1.2** Competition law  
and antitrust compliance

**1.3** Conflicts of interest

**1.4** Corruption, bribery  
& influence peddling

**1.5** Money laundering

**1.6** Tax evasion

**1.7** Fraud and theft

**1.8** Lobbying & political neutrality

**1.9** Responsible sponsorship &  
political involvement

**1.10** Transparency, communication,  
integrity

**1.11** Data protection, privacy &  
cybersecurity

**1.12** Protection of image & reputation

**1.13** Gifts and hospitality

**1.14** Ensure the proper use of  
company resources



### 1.1 Compliance with all applicable laws

B&B HOTELS has committed to full compliance with the applicable business laws, rules, and regulations, as listed below. It should be noted that the following list is not exhaustive.

In conducting our business, we will observe and act in compliance with relevant laws, practices and international guidelines.

#### 1 Bribery

All national & international OECD Conventions combating bribery  
All applicable anti-corruption laws having an extra territorial effect:  
> FCPA; UK bribery act; Sapin II law

#### 2 Money laundering

> All Anti-Money Laundering (AML) applicable regulations

#### 3 Modern slavery

All applicable anti-slavery or human trafficking laws, codes & regulations

#### 4 Data protection

GDPR, LGPD and all data protection laws & privacy laws

#### 5 Human rights

- The OECD due diligence guidance for responsible business conduct
- The United Nations Universal Declaration of Human Rights and the European Convention on Human Rights
- The International Labor Organization conventions related to Human Rights
- The UNGP (United Nations Guiding Principles on Business and Human Rights)

#### 6 Antitrust

All antitrust regulations including the Treaty on the Functioning of the European Union (TFEU) that can be found in Articles 101 through to 106. These laws promote vigorous competition and protect the group and its stakeholders from anticompetitive mergers and business practices

#### 7 Sustainable Development Goals

B&B HOTELS' commitments and actions are also guided by the 10 Principles of the United Nations Global Compact and associated Sustainable Development Goals (SDGs)

### 1.2 Competition law and antitrust compliance

Competing fairly is an essential part of doing business responsibly as it benefits our guests, shareholders, employees and it helps to protect the trusted reputation of B&B HOTELS. We are committed to complying strictly with competition rules in every country where we operate.

#### DEFINITION

**Competition laws are designed to promote competition and protect consumers. They prohibit any agreement, arrangement or concerted practice that materially prevents, restricts or distorts competition (or intends to do so) and thereby affects business.**

#### WE SHOULD ALWAYS

- Compete vigorously but fairly with our competitors.
- Seek guidance from Legal and Compliance departments before any discussions - even informal - with competitors.
- Avoid making negative or untrue comments about competitors, especially when it comes to their products or services.
- If we receive sensitive or secret information from a competitor, contact B&B HOTELS Legal right away.

#### WE SHOULD NEVER

- Have discussions with competitors that could be seen as an agreement on competitive matters.
- Share nonpublic information about prices, costs or occupancy with competitors, such as discount, margin, minimum price.
- Disclose information about customers, partners or projects with competitors.
- Enter into agreements with suppliers or customers that improperly restrict competition.

We have a responsibility to comply with any applicable law wherever we do business and avoid conduct that might suggest a violation. Failure to do so can result in imprisonment, substantial criminal fines and civil financial liability.

### 1.3 Conflicts of interest

We must always act in the best interest of B&B HOTELS and avoid any conflicts of interest.

#### DEFINITION

**Conflicts of interest can arise when personal, family or financial interests may influence, or be perceived to influence, your business decisions or your actions.**

**Determining whether a conflict of interest may arise can sometimes be difficult. We encourage you to ask yourself those questions:**

- Would you be comfortable explaining the conflict to your friends, family or co-workers? **Yes / No**
- Would you be comfortable if it was made public in the newspapers or online? **Yes / No**
- Will it influence, or appear to influence, your decision-making? **Yes / No**

#### WE SHOULD ALWAYS

- Avoid situations that could raise doubts about your judgment or impartiality.
- Promptly disclose any potential conflicts of interest that may arise, especially any relationship between a B&B HOTELS employee and a Government official who is in a position to influence the B&B HOTELS' business.

#### WE SHOULD NEVER

- Use your position to seek personal gain or provide advantages to third parties at the expense of B&B HOTELS.
- Ignore or conceal any information related to a conflict of interest.
- Own or participate in a business entity that operates in a competing or complementary business area with B&B HOTELS.
- Take part in a B&B HOTELS decision that involves hiring or supervising a family member.

### 1.4 Corruption, bribery & influence peddling

B&B HOTELS applies a zero-tolerance policy against corruption and bribery, whatever its form, active, passive, direct, indirect and against influence peddling.

#### DEFINITIONS

There are two types of bribery:

- **Active bribery** is when someone tries to influence another person, who may be in a public or private position, by offering gifts or advantages.
- **Passive bribery** is when someone accepts gifts or advantages in exchange for taking or avoiding certain actions related to their job and their responsibilities. These two types of bribery are separate offences.
- **Trading in influence** is when someone uses their influence to gain favours or benefits, such as jobs or contracts, in exchange for offers, promises, or gifts.

The exchange of gifts is a common business practice and one that can build goodwill among companies with which we do business, provided that they are reasonable in value, are not intended to unduly influence a business action and do not compromise our professional judgement or suggest preferential treatment. Determining what is acceptable is a matter of judgement.

#### WE SHOULD ALWAYS

- Recognize and identify any inappropriate requests or proposals we receive.
- Immediately report any behaviour that potentially violates our anti-corruption and influence-peddling policy to our manager, our local Compliance Officer, Legal Department, or Talent & Culture representative. You can also use the B&B HOTELS alert platform.
- Ensure that our business partners are fully aware of our requirements. This is especially important for partners representing B&B HOTELS in high-risk corruption countries.
- Firmly reject any bribes or inducements and clearly communicate to the person making the request that such actions are illegal, against our policies, and that we have a zero-tolerance approach to such issues.

#### WE SHOULD NEVER

- Accept, offer, promise, grant or authorize the giving of any bribe, payment or anything that can be construed as such (gifts, entertainment, employment, contracts or benefits of any kind) to any third party.
- Use personal funds to provide anything of value to government officials or other persons with the intention of obtaining or retaining a business.
- Directly or indirectly, offer, authorise or promise any personal or improper financial or other advantage to a Government Official for the purpose of obtaining information or influencing their decision-making processes.
- Stay quiet about corruption attempts we know about or be afraid to report them to our manager, Legal Department, or Compliance Officer.

As part of our efforts to combat corruption, we systematically include an anti-corruption clause in all our contracts and thoroughly assess our third parties before entering into any new relationships.

### 1.5 Money laundering

We strongly oppose money laundering. B&B HOTELS is dedicated to full compliance with all relevant laws and regulations pertaining to anti-money laundering (AML) initiatives.

#### DEFINITION

**Money laundering is the process by which funds generated through criminal activity (such as terrorism, corruption, drug dealing or trafficking, fraud, etc.) are processed through commercial transactions in order to conceal the source of the proceeds, avoid reporting requirements or evade taxes.**

- We conduct a thorough risk assessment of our third parties (such as landlords, sellers, suppliers, and hoteliers entrepreneurs) before entering into any business relationship.
- We ensure the identification and verification of the identity of our third parties based on the initial risk assessment.
- We maintain ongoing monitoring of our business relationships to keep Know Your Customer (KYC) information up to date.
- We conduct sanctions screening before opening accounts and perform regular screenings of our third parties.
- We consistently include an AML clause in our contracts to reinforce our commitment to anti-money laundering measures.

#### WE SHOULD ALWAYS

- Scrutinise all payments and transactions with customers, vendors, business partners, agents and affiliates.
- Apply the appropriate level of due diligence prior to entering into a relationship with a client or other third parties.
- Notify our manager, our HR business partner or our Legal and Compliance Officer if we suspect any fraudulent payments or if we are uncertain of the origin of the funds.

#### WE SHOULD NEVER

- Accept any funds or make any payments that appear to be derived from illegal activities or of any suspicious origin.

### 1.6 Tax evasion

We are committed to fulfilling our tax obligations responsibly and we strictly prohibit any form of tax evasion. We recognize the importance of how tax contributes to local society and the development of countries in which we do business.

#### DEFINITION

**Tax evasion refers to the illegal act of intentionally evading or avoiding the payment of taxes that an individual or entity is obligated to pay under applicable tax laws.**

- We are committed to paying all applicable taxes in the countries in which we do business.
- We aim to have a compliant and sustainable tax position and to contribute to the societies in which we do business.

#### WE SHOULD ALWAYS

- Avoid any actions or practices intended to unlawfully evade taxes.
- Strive to be transparent and honest.
- Accurately report and disclose all relevant information.

#### WE SHOULD NEVER

- Distort tax-related information.
- Engage in or set up tax schemes that unlawfully aim to avoid paying taxes due in any of our geographies.



### 1.7 Fraud and theft

We fight fraud and theft through different means, especially by maintaining accurate and complete recordkeeping.

#### DEFINITION

**Fraud can be described as a deliberate act of deceiving others through actions or intentional omissions. In a business context, fraud may involve submitting fabricated, false, misleading, or incomplete statements, returns, or documents with the aim of wrongfully collecting or evading payment of funds or obtaining information for illicit purposes.**

- We have established a system of internal controls.
- We have designed and implemented a comprehensive framework to prevent fraud and theft at every level of the company.

#### WE SHOULD ALWAYS

- Be honest.
- Ensure that our actions, as part of our roles, fully comply with all relevant laws and regulations.
- Be reasonable and prudent regarding any judgements and accounting estimates.

#### WE SHOULD NEVER

- Falsify or include misleading information in any documents, reports or other records, either on behalf of B&B HOTELS or at the request of any third party.
- Discard, destroy, or improperly alter records that are required to be preserved by law, by policy, or by specific "hold directives".

### 1.8 Lobbying & political neutrality

B&B HOTELS does not endorse any political party in any host country. Employees engaging in political activities do so in their personal capacity, outside of work hours, and not as representatives of B&B HOTELS. We formally prohibit political contributions or donations. Lobbying is a prevalent business practice, and given its potential impact on our activities, B&B HOTELS allows its presence. Nevertheless, we emphasise the importance of subjecting lobbying to stringent and appropriate regulation.

#### DEFINITION

**Lobbying is the practice of individuals and organisations trying to influence the opinions and decisions of officials in positions of power.**

**It is generally an acceptable and normal part of the legislative process. Lobbying activities shall be only carried out if conducted in compliance with all applicable legal requirements.**

#### WE SHOULD ALWAYS

- Avoid even the appearance of improper influence.
- Show integrity and intellectual honesty in our relationships with B&B HOTELS' stakeholders.
- Act with a particular caution, to ensure that no matters with business terms or customers are discussed, if we are a member of trade or industry or if we are in contact with competitors at industry events or meetings.

#### WE SHOULD NEVER

- Promote personal political opinions at work.
- Engage in discussions about politics on behalf of B&B HOTELS.

### 1.9 Responsible sponsorship & political involvement

In our business, we sometimes provide support to social, cultural, sporting or charitable initiatives. As part of its sustainability programme, B&B HOTELS is even actively supporting partnerships in the fields of education, inclusion or disability.

#### DEFINITION

It can be made through donations (voluntary contributions without receiving anything in return) or sponsorships (voluntary contributions to support a person, organisation, or event). It can be financial (monetary) or non-financial (hotel rooms for free or at a discounted rate).

#### WE SHOULD ALWAYS

- Handle requests for donations and sponsorships considering B&B HOTELS' partnership strategy and following classical company due diligence rules (KYC...).
- Make sure the sponsorship fits well with our core values and CSR pillars.

#### WE SHOULD NEVER

- Allow a partner who is failing to fulfil their obligations under our Sustainability Commitments, especially regarding B&B HOTELS' Anti-Bribery, Corruption & Trading in Influence Policies, to continue without addressing the issue.

### 1.10 Transparency, communication, integrity

Ensure regular, fast and clear communication providing all our partners and customers with the right level of information.

#### DEFINITION

Ethical marketing and advertising means promoting products or services in an honest, fair, and transparent way, while respecting consumer rights and societal values.

- To ensure responsible communication campaigns, we implement a validation procedure for commercials and communications before their distribution.
- We maintain transparency in all our actions and communications, guaranteeing price transparency for our guests.

#### WE SHOULD ALWAYS

- Ensure that we comply with laws regarding advertising and the use of third party.
- Ensure that copyrights, authors' rights, personality rights and usage rights are respected.
- Demonstrate transparency in all actions and communications, ensuring that guests have access to clear and honest information about prices.
- Resist and discourage any form of stereotyping or sexism in our communication campaigns.
- Refrain from taking advantage of our guests' lack of knowledge or experience.

#### WE SHOULD NEVER

- Discuss or work in a public place with confidential information.
- Communicate sustainability initiatives that have not yet been actioned or rolled out.
- Create a false perception of being more environmentally or socially responsible than we genuinely are.

### 1.11 Data protection, privacy & cybersecurity

We are all responsible for safeguarding information under our care. Information held within B&B HOTELS is an asset with a business value and must be protected accordingly. Protecting the personal information of our clients, our employees and any other stakeholders is a strong commitment.

#### DEFINITION

**“Personal information” includes any information that directly or indirectly identifies an individual, such as their name, address, and other contact information, medical information and online identifiers.**

- We diligently adhere to national laws and regulations governing the collection and usage of personal data, prioritising respect for privacy.
- When collecting personal data, we inform individuals about the purpose of the collection and provide them with the option to access and modify the information.
- If we come across sensitive information during our responsibilities, we take measures to prevent its disclosure.
- We handle information with great care, including when sharing it with consultants or other partners.
- We respect individuals' rights to withdraw consent, request modifications or erasure of their data, and limit or object to data processing.

**Cybersecurity is the practice of protecting computer systems, networks, and data from digital threats and unauthorised access to ensure their confidentiality, integrity, and availability.**

**In that regard, we have enhanced our security measures by appointing a Group Chief Information Security Officer (CISO) and regional resources.**

- We have established a comprehensive framework of policies and procedures
- We have implemented a multi-factor authentication system
- We conduct regular pentest sessions and phishing campaigns as part of our proactive security measures.
- Employees are required to participate in mandatory cybersecurity e-learning training, especially if they fail the phishing campaign exercise.

#### WE SHOULD ALWAYS

- If handling personal information, make sure the data is collected and used with the appropriate consent, for legitimate business purposes, and always in compliance with our Data Protection Guidelines.
- Before sharing personal information, either inside or outside the company, ensure we are authorized to share such information under the given circumstances.
- Allow people to exercise their rights: access to their data, the right to rectify their data, have it erased or object to its use.
- Report any data breach where the data are compromised (lost, stolen, damaged, not in serviceable condition,...) to the authorities and people concerned.

#### WE SHOULD NEVER

- Access, share or store personal data without the necessary authorities and consent or allow an unauthorised third party to access personal data.
- Use the data for end purposes other than those for which they were initially collected.

## 1.12 Protection of image and reputation

The protection of our reputation is essential.

### WE SHOULD ALWAYS

- Act with the interests, image, and reputation of B&B HOTELS in mind.
- Ensure that your personal opinions and interests cannot be confused with those of the B&B HOTELS Group.

### WE SHOULD NEVER

- Speak or make commitments in the name of or with the Group's name without authorization.
- Use the B&B HOTELS email address or letterhead for your personal business.

## 1.13 Gifts and hospitality

The Group is committed to combating breaches of integrity.

### DEFINITION

**A gift is a material benefit of a certain value, offered or received.**  
**An invitation is any type of expense for the benefit of another person without compensation.**

### WE SHOULD ALWAYS

- Ensure that gifts and invitations received comply with the Group policy.
- Ensure that gifts and hospitality are declared in accordance with the Group policy.

### WE SHOULD NEVER

- Offering hospitality to a public official or civil servant.
- Accepting gifts related to your duties that would be delivered to your home.

## 1.14 Ensure the proper use of company resources

Resources are available to all employees to enable them to carry out their duties in the best possible conditions. Each of us is responsible for taking care of these resources to ensure the performance of the B&B HOTELS Group.

Misuse of corporate assets consists of the deliberate and personal use of company properties or credit, or of powers obtained by local managers, in a manner contrary to the corporate interest.

### WE SHOULD ALWAYS

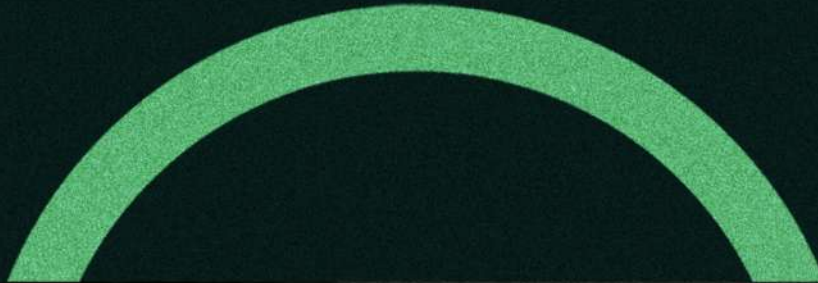
- Protect resources against loss, damage, theft, waste, and inappropriate use.
- Ensure that the Group's assets are not lost, damaged, misused, loaned, transferred, or disposed of without authorization.

### WE SHOULD NEVER

- Use the Group's assets for a purpose contrary to our ethical principles.
- Use resources for personal gain in an unreasonable manner.
- Making purchases on behalf of the company without following purchasing processes.



## #2 PEOPLE & SOCIETY EMPOWER EVERYONE



**2.1 Harassment-free work environment**

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**2.2 Equal opportunities & decent wage**

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**2.3 Training & career development**

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**2.4 Health, safety & security**

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**2.5 Genuine social dialogue**

**2.6 Freedom of association  
& right to collective bargaining**

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**2.7 Guest experience**

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**2.8 External relationships  
& community engagement**

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**2.9 Supplier diversity**

## #2 PEOPLE & SOCIETY - EMPOWER EVERYONE

At B&B HOTELS, our commitment to diversity, equity & inclusion is at the core of everything we do. We pride ourselves on our meritocratic business model, providing opportunities for individuals of all backgrounds to excel and contribute. Our goal is to create an inclusive environment where every employee feels respected and valued. So that they can contribute their uniqueness to our company's global expansion. Our guiding values - Empathy, Smart Simplicity, Integrity, Inclusion, and Entrepreneurship - drive us to connect with others, build a friendly community, and make a positive impact on the world. Diversity plays a vital role in shaping our organisation's procedures and processes to ensure equal opportunities and prevent discrimination. We are also dedicated to respecting the diversity of our clients & suppliers wherever we operate.

### 2.1 Harassment-free work environment

We do not allow any form of harassment or discrimination on the basis of race, religion, ethnicity, sex, sexual orientation, gender identification, national origin, age, marital status, disability, pregnancy or any other basis in accordance with applicable law. Any behavior that compromises this commitment will not be tolerated and will be dealt with promptly and appropriately.

#### DEFINITION

**Unacceptable behaviour in the workplace encompasses any actions that either physically or morally threaten, menace, abuse, or offend others based on any protected characteristic. This includes, but is not limited to, engaging in derogatory remarks, making inappropriate jokes, sexual comments, or innuendoes, using abusive or insulting language or gestures, and issuing threats of violence.**

**An employee witnessing discrimination or harassment has an affirmative obligation to report such conduct to his/her manager, his/her HR business partner, his/her Legal and Compliance Officer.**

**If you see or suspect any violation, or feel you are a victim of harassment or discrimination, promptly report it. To facilitate reporting, B&B HOTELS provides a local alert line and a digital alert platform that you can utilise if needed (please refer to the "Speaking Up" section for more details).**

- B&B HOTELS has implemented comprehensive training programmes on this topic to ensure that individuals develop a heightened awareness and sensitivity and are equipped to take the necessary actions when required.

#### WE SHOULD ALWAYS

- Be respectful with our colleagues and co-workers.
- Avoid any conduct that might create a hostile working environment.
- Immediately report any instance or suspicion of harassment or discrimination.

#### WE SHOULD NEVER

- Speak or behave in a way that is hurtful, upsetting or offensive.
- Disregard or keep quiet about any instance of harassment.

### 2.2 Equal opportunities & decent wage

At B&B HOTELS, we are committed to providing equal employment opportunities, decent wage that meets or exceeds local living wage standards and promoting fair and unbiased processes in all aspects of the employment experience. Our decisions will be solely based on skills, qualifications, performance, and merit. We aim to create a fair and equitable workplace across all levels of the organisation.

#### DEFINITION

We refer to the principle of equal opportunities by ensuring that everyone is treated fairly and without discrimination. This encompasses recruitment, advancement, training, wages and benefits, regardless of race, gender, age, disability, sexual orientation, religion, or any other characteristic unrelated to job performance. Our remuneration packages are designed to ensure that every employee can afford a decent standard of living, covering essential needs such as food, shelter, clothing, healthcare, and education. Our compensation structure is based on factors such as skills, experience, performance, and market conditions. We strive to provide fair and equitable compensation across all levels of the organisation, promoting internal growth and development.

#### WE SHOULD ALWAYS

- Foster fair, open and equitable treatment of all in our processes and practices.
- Promote inclusive workplace culture that encourages respect, collaboration, and dialogue.

#### WE SHOULD NEVER

- Tolerate discrimination or harassment of any kind within our workplace.
- Allow biases, stereotypes, or preconceived notions to influence decisions.

### 2.3 Training & career development

At B&B HOTELS, everyone is encouraged to grow in their careers and gain valuable experiences. We value each individual's goals and promise to offer learning opportunities that are accessible to all, anytime and anywhere. B&B HOTELS is committed to enhancing its employees' career development, benefiting both the company's future and empowering our employees to thrive in an ever-changing world.

#### DEFINITION

Career development refers to the ongoing process of acquiring new skills, knowledge, and experiences to enhance one's career prospects and advance professionally within the organisation.

- We can learn from anywhere and at any time through the **B&B HOTELS FOR U** e-learning platform on top of face-to-face training programmes.
- We promote internal mobility, valuing and rewarding our employees. We use dedicated talent assessment and mapping across the Group to foster a sense of belonging and growth. Annual career development meetings serve as an excellent starting point for identifying future growth and development opportunities.

#### WE SHOULD ALWAYS

- Recognise and celebrate professional success whether it is a small step or a big achievement.
- Prioritise internal talent and explore opportunities within the organisation before considering external recruitment.

#### WE SHOULD NEVER

- Forget that every employee at B&B HOTELS should be given the opportunity to grow.

## 2.4 Health, safety & security

All our employees and hoteliers entrepreneurs have the right to a safe working environment.

### DEFINITION

The Health & Safety Department takes the lead in maintaining a healthy workplace by managing risks, recording and responding to incidents, and implementing action plans as necessary.

#### To enhance workplace safety and well-being, we undertake the following actions:

- Identifying and assessing short and long-term risks associated with each position, activity and, department.
- Offering training and resources to reduce accidents and occupational illness. This includes all wellbeing local initiatives.
- Managing the human impact of any changes in working conditions.

#### WE SHOULD ALWAYS

- Comply with safety regulations and directives, taking all reasonable precautions to maintain safety.
- Be mindful of our actions and ensure they do not pose risks to others.
- Report any situation that could compromise the safety and security of our workplace.

#### WE SHOULD NEVER

- Neglect the rules and regulations on health, safety & security.

## 2.5 Genuine social dialogue

Social dialogue plays a central role in maintaining harmony within our community.

### DEFINITION

Open dialogue between management and all employees provides a platform for everyone to freely express their opinions and concerns. This open exchange of ideas fosters a highly inclusive and engaged work environment, where each individual's voice is not only acknowledged but also respected and valued.

With our culture of openness and continuous improvement, we create opportunities for growth, improved relationships, and a more cohesive work community. Maintaining ongoing consensus helps to resolve labour-related issues.

#### WE SHOULD ALWAYS

- Encourage and develop every form of social dialogue.
- Ensure a safe environment to foster open dialogue - no judgement.

#### WE SHOULD NEVER

- View social dialogue as counter-productive.



## 2.6 Freedom of association & right to collective bargaining

Freedom of association and the right to collective bargaining are fundamental rights that empower our employees to join and form organisations of their choice. These collective efforts aim to advocate for and protect their shared interests within the company.

Emphasising these rights is crucial in promoting a fair and democratic workplace where our employees can voice their concerns and work collaboratively towards mutual goals and improvements.

### DEFINITION

Freedom of association refers to the rights of workers and employers to create and join organisations that represent them, such as trade unions and employers associations. Workers must be free to choose how they are represented, and B&B HOTELS must not interfere in this process.

### WE SHOULD ALWAYS

- Ensure compliance with the timescale for consulting stakeholders and employee representatives.
- Make sure that employees can freely express themselves within the company regarding their working conditions.

### WE SHOULD NEVER

- Prohibit or obstruct the establishment of an internal employee representative body.

## 2.7 Guest experience

B&B HOTELS is dedicated to providing a welcoming and inclusive experience for all guests. We will actively promote tolerance, respect, and understanding among our staff to ensure that all guests are treated fairly, feel valued and comfortable during their stay.

### DEFINITION

The guest experience encompasses every interaction a guest has with our brand, from the moment they make a reservation to the time they check out. It includes the ambiance of our facilities, the helpfulness and professionalism of our staff, the cleanliness and comfort of our accommodations, and the overall satisfaction. A positive guest experience is rooted in empathy, attentiveness, and a commitment to exceeding expectations.

### WE SHOULD ALWAYS

- Ensure that every guest feels at home by providing exceptional service and responding promptly to their needs and feedback.
- Foster open communication and encourage guests to express their thoughts and experiences, and actively listen to their concerns to improve their stay.
- Treat all guests with dignity and respect, regardless of their background, beliefs, or preferences.

### WE SHOULD NEVER

- Compromise our guest privacy by not ensuring their personal information is kept confidential and their space is protected.
- Tolerate any form of discrimination against our guests.
- Ignore guest feedback by dismissing or overlooking guest complaints or suggestions.

## 2.8 External relationships & community engagement

We believe in making a positive impact on the communities in which we operate. B&B HOTELS will actively engage with local organizations and initiatives that promote diversity, equity & inclusion, reflecting our commitment to social responsibility. Wherever we operate, we are committed to developing productive, mutually beneficial and long-term relationships with diverse groups of stakeholders. We work to accommodate the different cultures, lifestyles, heritage and preferences of local communities.

### DEFINITION

External relationships and community engagement refer to the proactive relationships we cultivate with individuals, organizations, and stakeholders outside our company. This includes partnerships with local businesses, collaboration with community organizations, and participation in initiatives that promote social, economic, and environmental well-being. We strive to understand and respect the unique values and traditions of each community, ensuring our engagement reflects our commitment to positive impact.

### WE SHOULD ALWAYS

- Respect local cultures, recognizing the importance of local customs, traditions, and values in our operations.
- Support local economies, prioritize collaboration with local vendors, businesses, and service providers, ensuring our economic impact benefits the community.
- Encourage sustainable practices, advocate for and implement initiatives that promote environmental sustainability and responsible tourism in collaboration with community partners.

### WE SHOULD NEVER

- Overlook the concerns and aspirations of local communities, especially when they impact our business operations.
- Neglect to consider the long-term effects of our operations on local resources and environments.
- Tolerate any form of discrimination or bias in our community interactions or partnerships, maintaining a standard of respect and fairness for all.

## 2.9 Supplier diversity

We recognize the importance of supporting diverse businesses. We will strive to increase the diversity of our suppliers and contractors and actively seek partnerships with various businesses that align with our values and quality standards.

### DEFINITION

Supplier Diversity involves actively incorporating a wide range of suppliers into our procurement processes. We believe that diverse suppliers not only enrich our supply chain but also foster innovation, community engagement, and economic growth.

### WE SHOULD ALWAYS

- Actively identify and prioritize partnerships with diverse suppliers across our procurement processes to ensure equitable opportunities.
- Offer support to diverse suppliers to help them grow and succeed in a competitive marketplace.

### WE SHOULD NEVER

- Sacrifice quality standards in our selection of diverse suppliers — our commitment to supplier diversity should never come at the expense of excellence.
- Overlook the importance of the assessments and improvements of our supplier diversity initiatives.

## #3 ENVIRONMENT PROTECTING THE ENVIRONMENT



**3.1 Fighting climate change**

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**3.2 Promoting circular economy**

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**3.3 Conserving natural resources**

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**3.4 Protecting biodiversity**

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**3.5 Sustainable procurement**

**3.6 Pollution prevention**

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**3.7 Animal welfare**

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**3.8 Promoting a healthy and sustainable diet**

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**3.9 Raising stakeholders' awareness**

### 3.1 Fighting climate change

At B&B HOTELS, we recognize our significant role in addressing climate change and its impacts on the environment and communities we serve. By incorporating environmentally more responsible practices into our business model, we aim to contribute positively to the planet and promote a culture of sustainability.

#### DEFINITION

**Climate change refers to the warming of the Earth due to human actions, causing shifts in weather and natural patterns.**

**B&B HOTELS wholeheartedly embraces its responsibility to comply with environmental regulations, safeguard and preserve the environment, and actively reduce its ecological footprint.**

- We have set a clear target to power our hotels with electricity 90% sourced from renewable resources.
- We are firmly committed to respecting a climate trajectory based on scientific findings, fully aligned with a 1.5°C pathway (scopes 1 and 2) and a below 2°C pathway (scope 3). Our goal is to create a robust decarbonisation plan that guides our actions in effectively addressing climate change (such as renewable energy sources).
- Regarding greenhouse gas emissions, we are fully committed to regularly and comprehensively measuring our carbon footprint, adhering to the GHG Protocol methodology (scope 1, 2 and 3 emissions).
- We are dedicated to publicly reporting our progress towards these targets. By regularly sharing updates, we ensure transparency.

#### WE SHOULD ALWAYS

- Be proactive in finding ways to limit our impact on climate.
- Take into account the impact on climate of every decision we make.

#### WE SHOULD NEVER

- Ignore the immediate and future environmental impacts of our business operations and construction projects.
- Seek exemptions from or lobby against climate regulations.



### 3.2 Promoting circular economy

In our commitment to sustainability, we recognize the importance of the circular economy as a transformative approach to managing resources and waste. By promoting a circular economy within B&B HOTELS, we not only enhance our operational efficiency but also contribute to a healthier planet. This philosophy encourages us to rethink traditional methods of consumption and disposal, focusing instead on innovative practices that minimize waste and resource utilization throughout our operations.

#### DEFINITION

Circular economy prioritises efficient resource usage, resilient product design, and waste reduction through recycling and reuse.

**As part of our ongoing journey towards sustainability, we are resolutely applying the principles of circular economy within our hotels and extending this ethos beyond our premises. Our approach encompasses a three-fold focus:**

- We are actively working towards eliminating plastic usage, with particular attention to single-use plastics.
- We are partnering with local solution providers, ensuring that surplus food finds its way to those in need.
- We enthusiastically encourage the reuse and recycling of products, fostering a more environmentally conscious and responsible way of operating.

#### WE SHOULD ALWAYS

- Raise employee awareness about eco-friendly practices in their roles.
- Prioritise sustainable solutions in hotel construction and operations, such as, waste sorting and recycling, and the use of environmentally friendly products.
- Regularly monitor and track waste production.

#### WE SHOULD NEVER

- Cause or allow a situation of non-compliance with B&B HOTELS' environmental objectives and practices.

### 3.3 Conserving natural resources

Supporting natural resource conservation efforts is crucial to minimize our environmental impact.

#### DEFINITION

It refers to the responsible management and protection of Earth's elements, such as water, air, soil, minerals, and forests, to ensure their sustainable availability for present and future generations.

**At B&B HOTELS, we are very well aware of the urgent need to help preserve our shared natural resources while contributing to stay within planetary boundaries. This is why we are dedicated to limit the impact of our hotels, through various initiatives:**

- Strive to regulate the use of natural resources during hotel construction and operations, emphasising sustainable alternatives.
- We actively invest in water limitation equipment to effectively reduce water consumption across our properties.
- We prioritise the use of furniture and equipment made from recycled materials or sourced from sustainable managed origins.
- We are defining quantifiable objectives to limit the impact of all our activities on natural resources.

#### WE SHOULD ALWAYS

- Conduct regular monitoring of water and energy consumption.
- Define target considering the local context (water availability).
- Strive to regulate the use of natural resources during hotel construction and operations, emphasising sustainable alternatives.

#### WE SHOULD NEVER

- Leave harmful or wasteful practices unaddressed or unresolved.

### 3.4 Protecting biodiversity

Protecting biodiversity and supporting collaborative efforts on local, national, and global scales is essential to address the biodiversity loss and ensure a sustainable future for all living organisms.

#### DEFINITION

Biodiversity embodies the abundance of life forms within a specific ecosystem, encompassing various species of plants, animals, microorganisms, and their interactions.

**The tourism industry can significantly impact biodiversity. At B&B HOTELS, we are acutely aware of our ecological footprint and strive to implement actions of protection and restoration. Our areas of improvement:**

- Measuring the impact of our activities on biodiversity.
- Promoting biodiversity protection programs in each hotel, as well as throughout its ecosystem and supply chain.

#### WE SHOULD ALWAYS

- Be proactive in finding ways to limit our impact on and restore biodiversity.
- Support local policies and regulations that protect nature and contribute to global biodiversity goals.

#### WE SHOULD NEVER

- Promote activities that could negatively impact endangered species.
- Partner with suppliers whose operations harm biodiversity.

### 3.5 Sustainable procurement

Sustainable procurement is crucial to our commitment to environmental stewardship and social responsibility. We prioritize ethically produced, eco-friendly, and socially responsible products and services, partnering with like-minded suppliers to minimize our ecological footprint and support local economies.

#### DEFINITION

Sustainable procurement refers to the process of integrating Environmental, Social and Governance criteria together with fundamental Economic criteria when selecting key suppliers and partners.

**B&B HOTELS therefore requires its suppliers to commit and comply with the principles defined in this Code, both related to compliance with applicable laws, fostering differences, environmental protection and the promotion of human dignity. Our approach includes:**

- A thorough risk assessment of our suppliers.
- The inclusion of sustainability clauses in our contracts.
- The activation of environmental and social criteria when selecting our key suppliers and procurement categories.
- Regular assessment of suppliers over the course of the contract checking that suppliers are complying with the undertakings contained in this Code of Ethics.



### 3.5 Sustainable procurement (continued)

#### WE SHOULD ALWAYS

- Consider environmental and social criteria when selecting suppliers or referencing products.
- Make our suppliers aware of the principles defined in this Code of Ethics by attaching it to our contracts for example.
- Regularly monitor our suppliers and check their adherence with the principles defined in our Code of Ethics.

#### WE SHOULD NEVER

- Select a product or a service without considering its environmental and social impacts or the practices of the supplier.

### 3.6 Pollution prevention

Emphasizing proactive measures and preventing pollution is key to successful pollution management. By focusing on eliminating pollutants at the source, we can contribute to a healthier planet, benefiting both current and future generations.

#### DEFINITION

The release of organic matter, particles, or chemicals in hotel discharges can affect the quality of air and groundwater. Additionally, managing hotel operations may occasionally result in noise, unsightliness, odours, and other nuisances.

**B&B HOTELS' operations may lead to both direct and indirect pollution. To manage our impact, we focus on the following actions:**

- Ensuring systematic treatment of wastewater from all our hotels.
- Prioritising the use of eco-labeled products for cleaning, maintenance, gardening, etc., which minimise chemical content in effluent and other discharges.
- Preferring environmentally friendly suppliers, especially for laundry services.

Furthermore, B&B HOTELS implements environmentally sensitive practices to limit all forms of nuisance, such as noise, light, unsightliness, odours, or air pollution.

#### WE SHOULD ALWAYS

- Consider health and safety standards when using chemicals.
- Try to avoid or limit every form of pollution (noise, odours, water discharge...) that could be resulting from our operations.

#### WE SHOULD NEVER

- Leave harmful practices unaddressed or unresolved, such as accidental pollution.

### 3.7 Animal welfare

We believe respectful treatment of all living beings is essential for any activity, especially for sustainable tourism and guest experiences. By adhering to humane practices, we aim to positively influence communities and our guests.

#### DEFINITION

Animal welfare refers to the ethical and responsible treatment of animals to ensure their physical and psychological well-being. It involves practices that prevent cruelty, provide proper care, and promote a humane environment for animals.

#### At B&B HOTELS, we take animal welfare seriously.

- We are committed to sourcing meat only from suppliers who adhere to high animal welfare standards.
- Our suppliers must comply with local animal welfare legislation, and illegal practices are strictly prohibited throughout our supply chain.
- We collaborate with farmers and suppliers to ensure legal compliance with animal welfare standards at all times.
- We welcome pets in our hotels.

#### WE SHOULD ALWAYS

- Consider animal welfare standards when selecting animal based products (meat, eggs, milk...).
- Inform our customers that our hotels are pet friendly.

#### WE SHOULD NEVER

- Ignore animal welfare considerations when selecting our products and suppliers.

### 3.8 Promoting a healthy and sustainable diet

In the present landscape, public health campaigns are focusing on nutrition as a preventive measure against diseases such as cancer, cardiovascular disorders, diabetes and obesity. Beyond health implications, it is essential to consider sustainable food not only as a nutritional choice but also as an environmental imperative.

#### DEFINITION

Sustainable food aims to minimize the ecological impact of our dietary choices while meeting the nutritional needs. In particular, certain eating habits, such as meat consumption, can lead to serious consequences for the environment, including pollution, deforestation, and loss of biodiversity.

#### In this context, B&B HOTELS is committed to championing a dual cause – a diet that is both wholesome and sustainable. This commitment takes shape through:

- Curating conscientious menus that rest upon balanced nutrition and organic and locally-sourced ingredients, reducing our carbon footprint.
- Equipping our guests and employees with lucid information, thereby empowering them to choose environmentally-friendly meals at our hotel restaurants.

#### WE SHOULD ALWAYS

- Strive to provide a food selection that is well-rounded, diverse, organic and predominantly sourced locally whenever feasible.
- Offer a vegetarian option in the dishes served at our hotels to minimize environmental impact.

#### WE SHOULD NEVER

- Disregard the environmental impacts of food production while sourcing our food ingredients.
- Ignore the importance of suggestions for a health-conscious and environmentally friendly diet.

### 3.9 Raising stakeholders' awareness

Incorporating everyday awareness and sensitivity towards environmental issues is a fundamental aspect of our commitment to environmental stewardship.

#### DEFINITION

It is essential to educate our guests in ways that inspire them to support our hotel programs. As the foundation of our sustainable development policies, our employees and hoteliers entrepreneurs are expected to act as ambassadors, leading by example in their daily conduct by upholding environmental principles and actively promoting our initiatives.

#### WE SHOULD ALWAYS

- Encourage our guests to adopt more sustainable practices such as helping to reduce laundry, water and energy use and using alternative modes of transport.
- Communicate clearly with our guests about the reasons for these initiatives.
- Report any malfunctions and failures that contribute to a negative environmental or social footprint.

#### WE SHOULD NEVER

- Discourage guests or co-workers to adopt environmentally friendly practices.

## #4 HUMAN RIGHTS PROMOTING HUMAN DIGNITY



**4.1 Combating modern slavery**

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**4.2 Tackling prostitution  
and pandering**

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**4.3 Advocating for essential  
workers rights**

**4.4 Protecting children from abuse**

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**4.5 Respecting local  
communities**

## #4 HUMAN RIGHTS - PROMOTING HUMAN DIGNITY

Respect for human rights is at the core of B&B HOTELS' ethical principles. We are committed to upholding the fundamental rights and dignity of every individual we work with.

It is vital that everyone is aware of the potential risks faced by B&B HOTELS, including image and reputational damage, loss of customer trust, shareholder and investor confidence, and the overall sustainability of the Group.

### 4.1 Combating modern slavery

#### DEFINITION

**○ Labour exploitation:**

means all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

**○ Child Exploitation:**

means a child is exploited for someone else's gain. This can include being trafficked, being kept in domestic servitude or being forced to become a soldier or marry.

**○ Domestic servitude:**

means someone who works unusually long hours; may be deprived of their own living space, food, water or medical care or who does not have access to their own belongings, including things like ID or mobile phone, which can isolate them.

**○ Criminal exploitation:**

means someone who is forced into crime such as carrying drugs, forced begging, theft or fraud.

**○ Sexual exploitation:**

means victims are forced to perform sexual acts.

#### We mitigate those risks by:

- Maintaining a strong policy commitment.
- Conducting a rigorous due diligence process prior to any new relationship.
- Enforcing modern slavery contractual clauses with suppliers and business partners.
- Providing our suppliers and business partners with a dedicated Code of Conduct.
- Offering continual staff awareness and training.

Aligned with our Modern Slavery Policy, we are dedicated to adhering to the guiding principles of the Organization for Economic Co-operation and Development (OECD), the Universal Declaration of Human Rights of the International Labour Organization (ILO), and the 10 principles of the United Nations Global Compact.

These commitments reinforce our strong stand against modern slavery and emphasise our dedication to upholding human rights in all our operations and partnerships.

To ensure all B&B HOTELS' employees, staff, and partners, including franchisees and hoteliers entrepreneurs, are well-informed about modern slavery, human trafficking, forced labour, criminal and sexual exploitation, our focus is twofold: firstly, we actively raise awareness of these global issues, particularly within the hotel industry, and secondly, we position ourselves as a leading advocate for human rights.

By adopting ethical recruitment practices and conducting specific supply chain due diligence (such as cleaning & security suppliers), we protect our corporate identity, we provide ethical guidance to our staff and we ensure operational efficiency across all B&B HOTELS.



### 4.2 Tackling prostitution and pandering

#### DEFINITION

Prostitution involves engaging in sexual relations in exchange for money. Pandering, on the other hand, refers to aiding a prostitute or contributing to another person's involvement in prostitution by arranging a sexual act with a customer in exchange for money or other rewards.

- We firmly reject any connection to human trafficking including instances of sexual exploitation such as minor prostitution and large scale-prostitution, especially where it is strictly prohibited.
- We are committed to promptly report any involvement or wrongdoing related to trafficking, both internally to the top management and externally to the authorities, strictly adhering to enforced local regulations.

#### WE SHOULD ALWAYS

- Ensure that the company's businesses and all B&B HOTELS premises are never utilised for the purposes of sexual exploitation.
- Report any discreditable or reprehensible conduct in this regard to the attention of the appropriate authorities.
- Ensure that the Group's activities are not used for organized prostitution.

#### WE SHOULD NEVER

- Disregard or withhold from management any incidence of prostitution or procuring that we may suspect.

### 4.3 Advocating for essential workers rights

#### DEFINITION

Forced labour refers to a situation in which individuals are coerced or compelled to work against their will, often through threats, violence, or deception.

We stand for non-illicit employment practices and thus support the adherence to lawful labour standards wherever we operate. In particular, we strongly condemn and actively combat all forms of child labour.

**Child labour is the employment or exploitation of children, usually in hazardous or exploitative conditions, depriving them of their right to education, health, and a safe childhood.**

#### What do we do?

- We place special emphasis on the responsibility of hoteliers entrepreneurs from the commencement of our partnership and throughout our collaboration. It is imperative that they diligently gather and provide us with all requisite labour documents in accordance with the regulations of the countries where B&B HOTELS operates, verifying the legitimate employment status of their staff (labour document, certificate of compliance or equivalent document).
- Moreover, we closely monitor the proper collection and verification of these documents from our partners at regular intervals throughout the contract duration.

#### WE SHOULD ALWAYS

- Carefully examine suppliers and service providers to ensure they do not employ people coerced into working through threats or intimidation.
- Strictly comply with the ILO standard for the minimum legal age (15 y/o).
- Exercise the highest level of care and attention by performing thorough due diligence before initiating a partnership. Ensure that, prior to signing any contracts, suppliers and service providers are carefully selected, and a dedicated clause is incorporated into the contract.

#### WE SHOULD NEVER

- Engage in or sustain business relations with suppliers or hoteliers entrepreneurs that do not adhere to these obligatory rules.
- Employ any child below the minimum legal working age stipulated in every host country, and we never employ a child under the age of 15 in any country.



### 4.4 Protecting children from abuse

B&B HOTELS is resolutely committed to safeguarding children from abuse, in its all forms: sex tourism, violence, criminal exploitation against children transcend geographical, social, and cultural boundaries. Taking a stand against the sexual and criminal exploitation of children entails assuming our responsibilities as a member of the tourism business.

#### DEFINITION

Child abuse encompasses the mistreatment and neglect of individuals who are under the age of 18. This includes various types of physical and emotional harm, sexual exploitation, neglectful care, or financial and other forms of exploitation that can cause actual or potential damage to a child's health, well-being, growth, or dignity.

#### WE SHOULD ALWAYS

- Be vigilant & report any suspicions or evidence of child abuse to the relevant authorities and cooperate fully with investigations.
- Encourage open communication and provide clear channels for reporting concerns.
- Respect privacy and treat all children and families with dignity and respect, ensuring that their information is shared only with authorized personnel.

#### WE SHOULD NEVER

- Ignore warning signs or disregard any indications of possible abuse.
- Establish any relationship that could be perceived as exploitative or harmful; maintain professional boundaries with minors at all times.

### 4.5 Respecting local communities

#### DEFINITION

Deeply rooted in its local communities, B&B HOTELS actively contributes to their economic growth by generating both direct and indirect employment opportunities. B&B HOTELS is also dedicated to preserving cultural heritage and natural ecosystems.

#### We are steadfast in our commitments:

- To endorse the hiring of local personnel with our hotels.
- Implement training programmes aimed at strengthening the skills and employability of our employees.
- To include fair trade products whenever plausible.
- Encourage local sourcing in our hotels.
- To actively develop connections with the communities we serve.

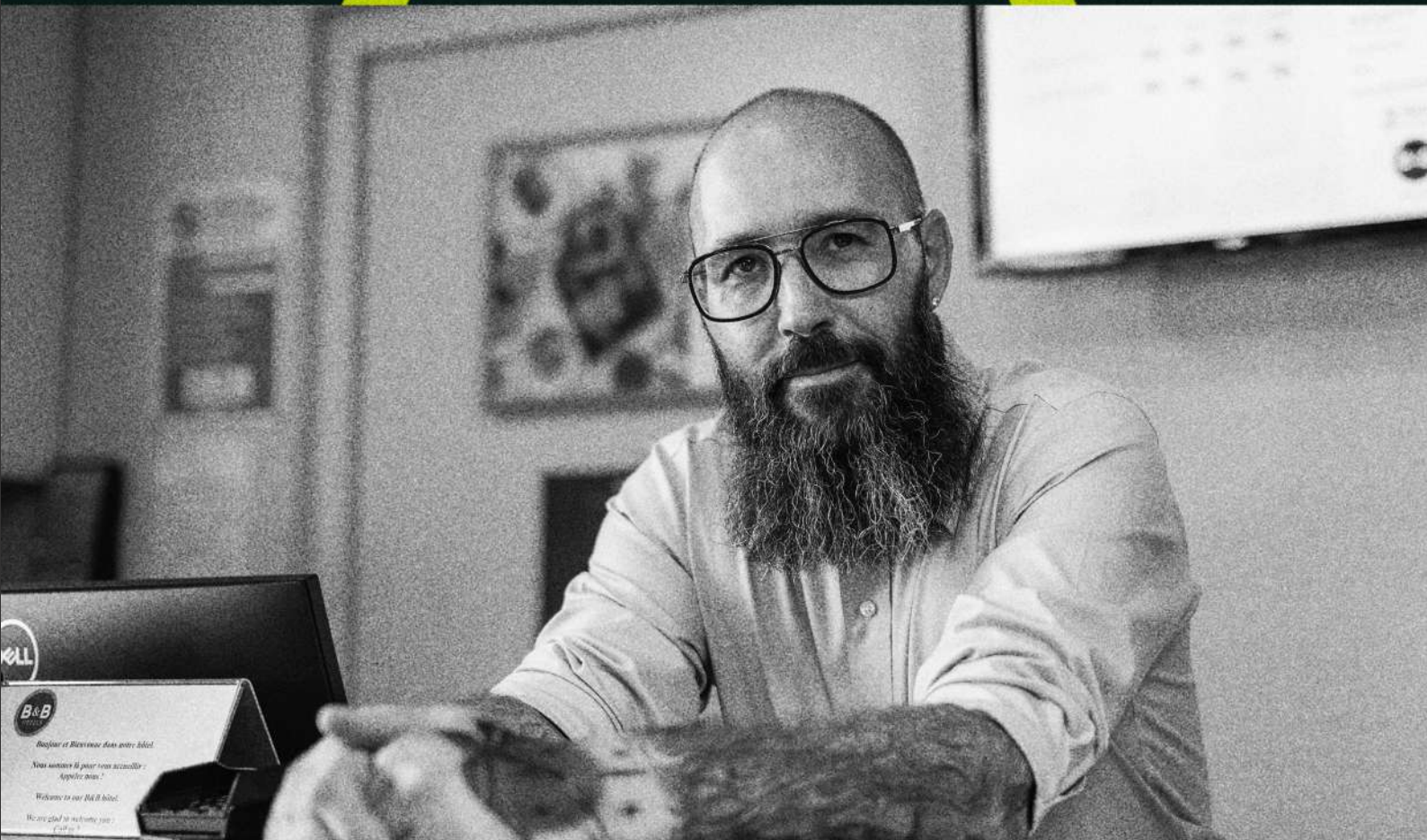
#### WE SHOULD ALWAYS

- Remember that the unique qualities of the local environment contribute to the richness and diversity that underpin B&B HOTELS' responsible pledges in host countries.

#### WE SHOULD NEVER

- Assume that local nuances or traditions justify a lack of adherence to our values and commitments.

## #5 CONCLUSION



### 5.1 Our governance system

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### 5.2 What sanctions or penalties for non-compliance with our Code of Ethics?

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### 5.3 In case of any doubt

# Our governance system

At B&B HOTELS Group, ethics and sustainability form the bedrock of our corporate governance framework. We wholeheartedly embrace the promotion of **ethical behaviors at every level of our organisation**, adhering to high standards of responsible and sustainable business conduct.

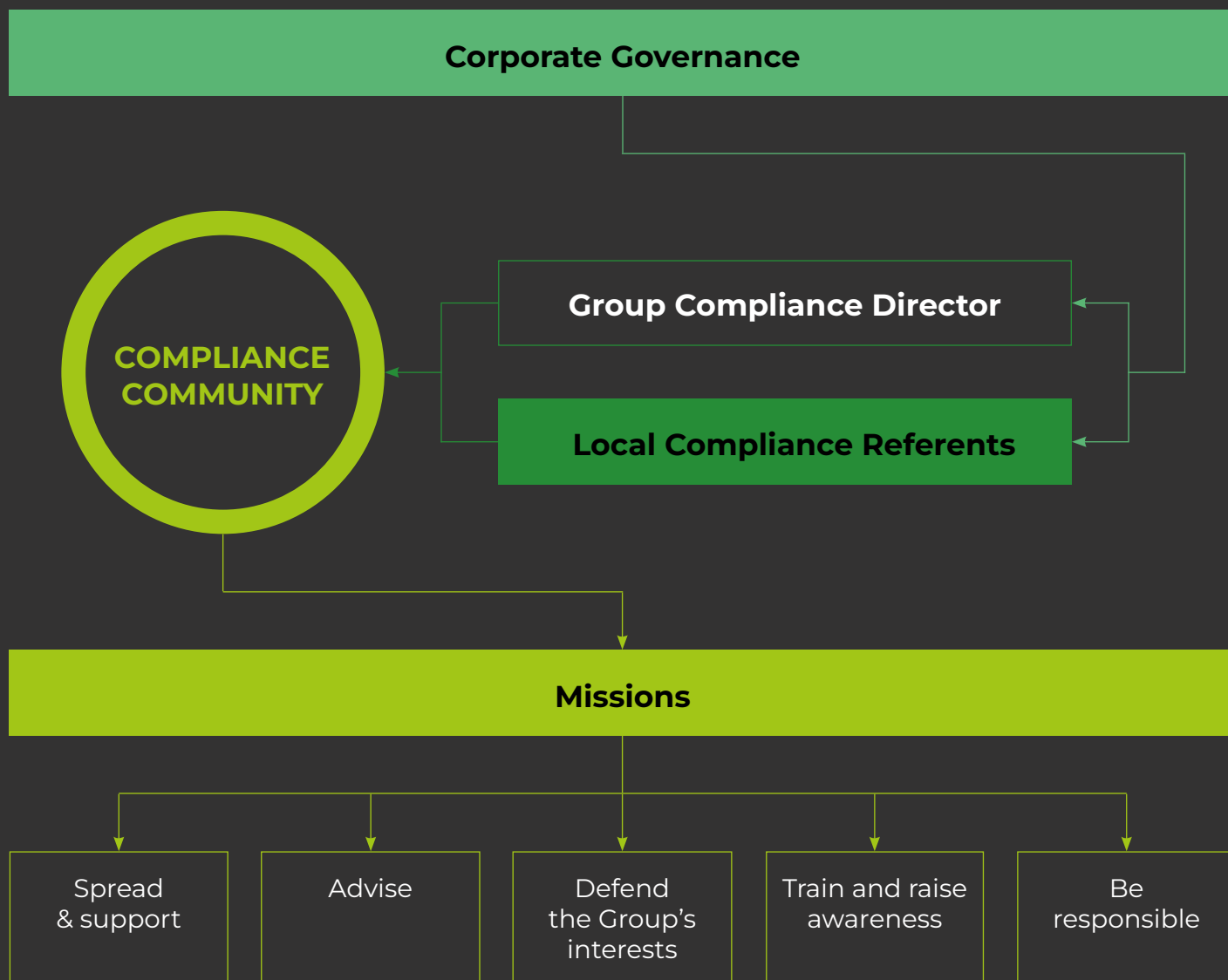
Our commitment to **compliance with laws and regulations** is unwavering. By upholding

robust corporate governance practices that prioritise **transparency, accountability, and ethical conduct**, we establish and nurture **trust with our valued stakeholders**.

This trust serves as a solid foundation for cultivating enduring relationships, building a sterling reputation, and fostering long-term value creation.

## Leading with ethics

All compliance program processes are updated regularly to meet new applicable legislation.



## Leading in line with our sustainability commitments

Our **sustainability commitments** and practices are at the heart of our business model and are overseen at least biannually by the Board of Directors.



B&B HOTEL, Lleida, Spain





# What sanctions or penalties for non-compliance with our Code of Ethics?

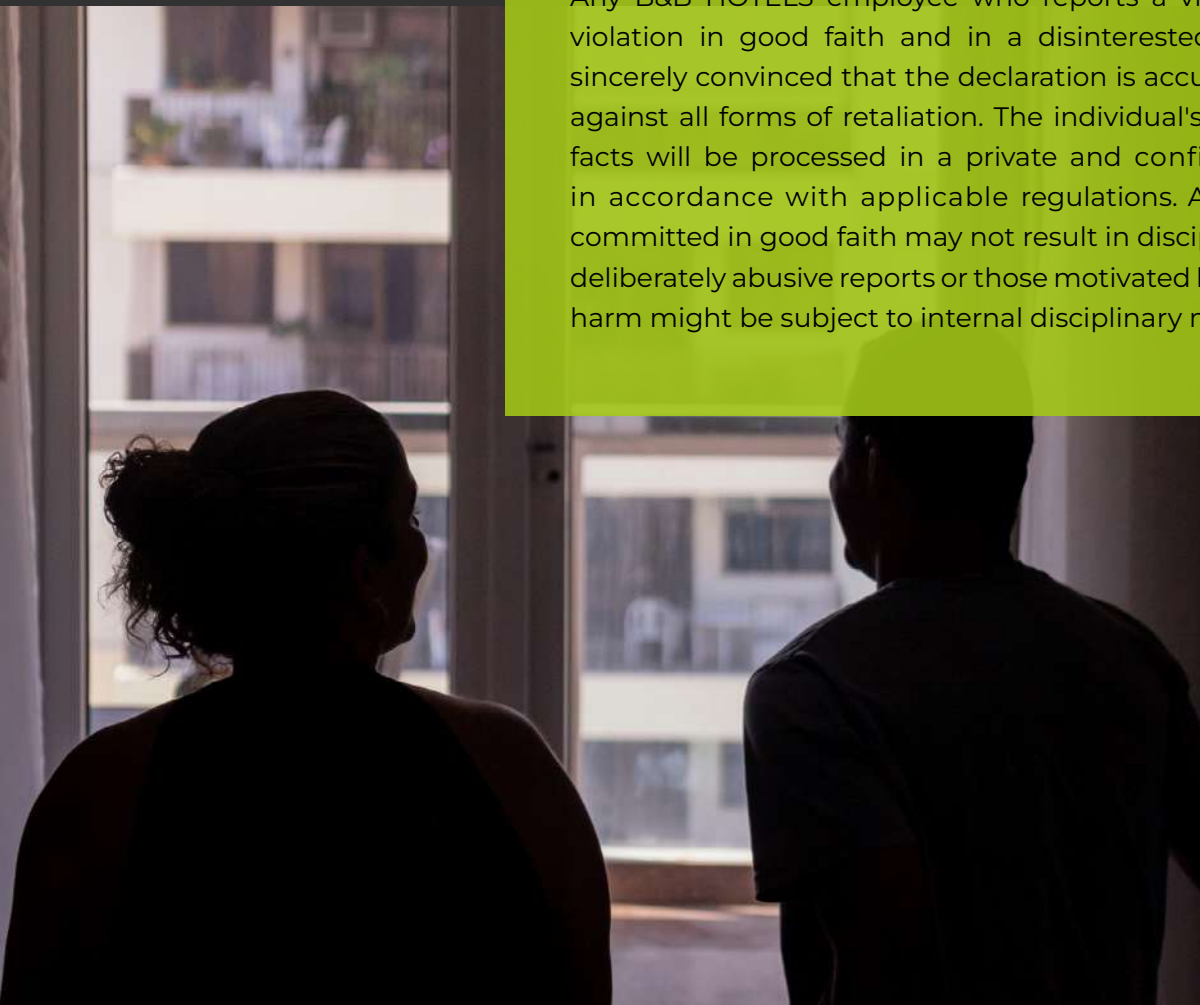
## Disciplinary measures

Proven violations of the Code of Ethics may result in severe disciplinary actions taken against offending B&B HOTELS employees or Third Parties. Such action could involve:

- o **A formal reprimand;**
- o **Suspension;**
- o **Termination of employment or Third Party contract.**

For Group companies registered in countries like France, which have their own internal rules, this Code is integrated within those internal rules, and the disciplinary measures provided for in the internal rules will apply in case of any violation. As for Affiliates, they will establish measures to ensure disciplinary actions are in place and will be applied in case of a breach of any provision of the Code.

Any B&B HOTELS employee who reports a violation or risk of violation in good faith and in a disinterested manner, being sincerely convinced that the declaration is accurate, is protected against all forms of retaliation. The individual's identity and the facts will be processed in a private and confidential manner in accordance with applicable regulations. Although an error committed in good faith may not result in disciplinary measures, deliberately abusive reports or those motivated by a wish to cause harm might be subject to internal disciplinary measures.





# In case of any doubt

## Support and guidance

The B&B HOTELS Code of Ethics and Sustainability Commitments offer clear guiding principles, though it may not cover all possible scenarios. Employees who seek advice, raise questions, or report potential breaches of the Code in good faith are aligned with its spirit. Such actions can be done confidentially.

### 01

When confronted with an ethical issue, we should consider the following questions:

- **Is it lawful and compliant** with our Code and policies?
- **Is it consistent** with our values and corporate commitments?
- **Do I feel comfortable talking** to my friends and family about it?

### 02

If the answer is no to any of these questions or if we have any doubt about the right attitude to adopt, we should discuss the issue with one of three Ethics Reference Contacts:

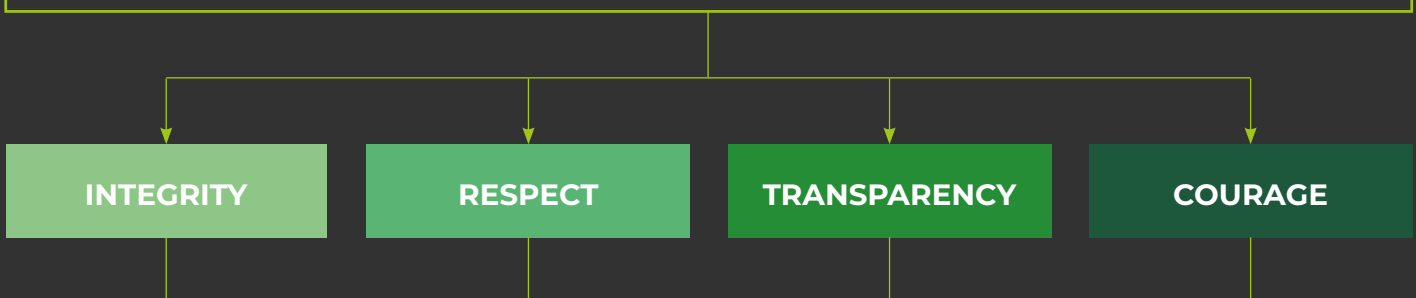
- **Our line superior** (refer to this contact whenever possible)
- **Our Legal or Compliance Officer**
- **Our Human Resources Representative or Sustainability Manager**

### 03

Under exceptional circumstances that cannot be resolved by other contacts or if the matter requires special attention or if the referents in point 2 are in conflict:

- **The Group Compliance Director can be contacted**

## Our ethical principles can help you address these situations



The ethical questions are not simple but must be considered



## MOVING FORWARD WITH INTEGRITY

### FOR ADDITIONAL INFORMATION

contact us here

Sustainability - [\*\*sustainability@hotelbb.com\*\*](mailto:sustainability@hotelbb.com)

Ethics - [\*\*ethics@hotelbb.com\*\*](mailto:ethics@hotelbb.com)



[bbhotels-group.com](http://bbhotels-group.com)

# The signatures

Executive Chairman	Fabrice COLLET	<i>Fabrice Collet</i>
Group Chief Executive Officer	Céline VERCOLLIER	<i>Céline Vercollier</i>
Group Chief Financial Officer	Damien MARTIN	<i>Damien Martin</i>
Chief Commercial Officer	Niklas ANDREEN	<i>Niklas Andreen</i>
Chief Executive Officer Western Europe	Valerio DUCHINI	<i>Valerio Duchini</i>
Chief Executive Officer Central & Northern Europe	Arno SCHWALIE	<i>Arno Schwalie</i>
Chief Executive Officer Italia, Hungary, Slovenia	Liliana COMITINI	<i>Liliana Cominiti</i>
Chief Executive Officer Iberia	David GARCIA	<i>David Garcia</i>
Chief Executive Officer Brazil	Flávia LORENZETTI	<i>Flávia Lorenzetti</i>
Chief Executive Officer UK	Patrick O'CONNELL	<i>Patrick O'connell</i>
Chief Executive Officer USA	Amir MUSTAFA	<i>Amir Mustafa</i>
Chief Sustainability Officer	Sophie DONABEDIAN	<i>Sophie Donabedian</i>
Group Chief People and Talent Officer	Consuelo CORRIDORI	<i>Consuelo Corridori</i>
Chief Executive Officer B&B HOME	Vincent QUANDALLE	<i>Vincent Quandalle</i>