

HUMAN RIGHTS POLICY

1. Introduction

This Policy on Human Rights (hereinafter, the “Policy” or the “Policy on Human Rights”) has been approved by the Board of Directors of NH Hotel Group, S.A. (hereinafter, the “Company” or “NH”) on 29 July, 2020, and sets forth its commitment to respecting the internationally recognized Human Rights, and it lays down such values and principles that will serve as a guideline to its business activities in all its scopes of action (with its employees, partners, customers, suppliers and the communities).

The principle of respect for and protection of Human Rights is integrated into the culture of NH and is applied to the activities carried out by the professionals, independently of the country or region where the activity is carried out.

The Company is committed to complying with Human Rights in accordance with the highest international standards and works to protect, respect and remedy (prevent and manage) the risks associated to the breach of such rights.

2. Scope of application

This Policy shall apply to the following persons, whether natural or legal:

- (i) All employees of companies consolidated within the company, regardless of the type of contract governing their employment¹, position, or geographical location. This also includes persons working in any of the company's hotels.
- (ii) Executives of all companies conforming MHEA, regardless of the type of contract that determine their business relationship, the position held or the geographical area performing their work. The following persons are in any case to be considered executives:
 - a. Directors of MHEA and of its subsidiaries,
 - b. Members of Senior Management and Executive Committees.

(i) and (ii) will be referred hereinafter as “team members”.

- (iii) Clients, suppliers, or partners, insofar this document may be applicable to them, and as long as MHEA has the capacity to make it effective.

Furthermore, the enforcement of this Policy, in full or in part, may extend to any natural and/or legal person associated with MHEA, where this may be appropriate to meet its purpose, and practicable on account of the nature of the relationship².

¹ Professionals in own, leased hotels and central services.

² In hotels under management and franchise agreements, the contractual relationship is directly with the hotel owner, who assumes labour obligations such as the payment of salaries, benefits and compliance with legal regulations, but is also included within the scope of this policy.

3. FRAMEWORK

Through this Policy, MHEA implements its commitment towards respecting and promoting Human Rights, as set forth in the United Nations Guiding Principles on Business and Human Rights and fostering them in the communities where it operates. This Policy is inspired by the following international declarations:

- UN Universal Declaration of Human Rights (1948)
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises (2011)
- Children's Rights and Business Principles.
- ILO Declaration on Fundamental Principles and Rights at Work and its Follow-Up
- International Covenant on Civil and Political Rights (1966).
 - Optional Protocol to the International Covenant on Economic, Social and Cultural Rights.
- Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty.
- International Covenant on Economic, Social and Cultural Rights (1966)
 - Optional Protocol to the International Covenant on Civil and Political Rights.
- International Convention on the Elimination of All Forms of Racial Discrimination (1965).
- Convention on the Elimination of All Forms of Discrimination against Women (1979).
 - Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984).
 - Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
- Convention on the Rights of the Child (1989).
 - Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict.
 - Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography.
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990).
- International Convention on the Rights of Persons with Disabilities (2006).
 - Optional Protocol to the Convention on the Rights of Persons with Disabilities
- International Convention for the Protection of All Persons from Enforced Disappearance (2006).
- United Nations World Tourism Organization (UNWTO) Framework Convention on Tourism Ethics.
- United Nations World Tourism Organization (UNWTO) Global Code of Ethics for Tourism.
- United Nations Global Compact

4. Guiding principles

Notwithstanding the framework as set forth under paragraph 3 above and the Code of Conduct of MHEA and its companies, that includes the inspiring rules included under the international declarations, the guiding principles for this Policy are the following:

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- Health and safety for anyone who has access to our facilities:

MHEA undertakes to take the required courses of action to ensure that its facilities (hotels and offices) do not represent a hazard to the health and safety of the clients and team members. MHEA prioritizes health and safety, even and especially under extreme, severe and unpredictable circumstances, having implemented different measures and plans so that the hotel activity has been carried out efficiently and under the premise of maximum guarantees in terms of health and safety for clients and team members, fulfilling all the requirements on this topic laid down in the domestic laws and regulations of the countries where it operates.

MHEA guarantees food hygiene and quality within the highest standards as set forth under the local regulations, always complying with strict controls and surveillance.

- Protection of team members' rights:

MHEA ensures decent employment conditions, in full compliance with applicable wages, working hours, guaranteeing fair remuneration, training and promotion.

Suppliers or contractors shall refrain from breaching the aforementioned principles.

- Freedom of association and collective bargaining:

MHEA respects the freedom of assembly, peaceful association and the right to strike of team members.

- Promotion of equality and inclusion

MHEA promotes equality and inclusion, committing to ensure no discriminatory practices based on race, sex, culture, religion or belief, political opinion, economic status, pregnancy or any other personal distinction, preventing cases of ill-treatment, degrading treatment, intimidation and/or harassment of any team members

Furthermore, people involved in MHEA's entire value chain will be allowed to express themselves freely, respecting freedom of thought, conscience, and religion.

- Child rights and child labour

MHEA respects children's rights and rejects child labour. The Company complies with minimum age standards for the employment of minors and respects and promotes children's rights, contributing to the eradication of child exploitation (labour and sexual) in all its activities, providing decent work for young team members.

MHEA ensures the protection and safety of children in its facilities, products and services.

MHEA has put in place special procedures in its hotel operations for minors, that prevents child exploitation and sex tourism.

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- Slavery, servitude or forced labour

MHEA firmly rejects any form of forced or compulsory labour, including slavery practices in its operations and to third parties in the scope of its activities (forced labour in conditions of servitude or slavery, human trafficking, sexual exploitation, sex tourism, child abuse, forced criminality, drug trafficking).

MHEA complies with minimum age standards for the employment of minors, as well as for hotel accommodation.

- Respect local communities and their environment

MHEA undertakes to respect the rights of local communities in such areas where it conducts its business activity, and to respect the local laws, culture and uses, undertaking to mitigate any negative impact on basic resources and people's livelihoods, in the development and operation of its facilities and activities.

- Right to freedom of opinion, information and expression

MHEA undertakes to respect and promote, within its scope of application, the right to freedom of opinion, information and expression, respecting diversity of opinion, providing to team members, clients and other stakeholders the information necessary for the correct performance of their activity and for the enjoyment of the products and services offered.

- Corruption

MHEA undertakes to work against corruption in all its forms, including extortion and bribery. The Company has approved a Corporate Anti-Fraud and Corruption Policy, as well as an Anti Money Laundering Policy, applicable to all team members of the Company. Following these policies, MHEA undertakes to carry out its business activity with complete transparency, honesty, integrity and responsibility, in a reliable manner and always respecting and complying with the applicable laws in every country where the Company has a presence. MHEA has put in place important trainings to all its team members regarding, among others, prevention of fraud, corruption and money laundering, as well as prevention models that include certain controls to avoid or mitigate these kinds of criminal behaviours.

- Privacy

MHEA respects the rights of all the persons with whom it interacts, regarding their privacy and intimacy, and it shall make an appropriate use of the personal data and information gathered in all the countries where it operates, paying special attention to the data of its team members, clients, and suppliers, in compliance always with the applicable legislation

MHEA has made available to all team members and third parties, a whistleblower channel to report, among others, any damage to the honour or reputation of any person with whom MHEA interacts.

- Intellectual property

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MHEA proactively ensures the proper use and protection of its copyrights and intellectual property rights.

5. Guiding principles for suppliers and partners

5.1 Suppliers

MHEA, through the specific Code of Conduct applicable to MHEA's suppliers, promotes compliance with principles related to respecting human rights, team members' rights, ruling labour law, the prohibition of child labour and forced or coerced labour; the elimination of discriminatory practices, compliance with working, health, safety and risk prevention conditions and the fight against fraud, bribery and corruption, and care of the environment where they operate.

Furthermore, apart from the general whistleblowing channel, available to all MHEA's team members and third parties, as referred to below, the Company has established an additional whistleblowing channel for suppliers (codeofconduct@coperama.com).

5.2 Partners

MHEA promotes that their partners share their values in line with MHEA's inspiring principles. MHEA requires them to operate in compliance with applicable laws and regulations and expects them to operate their businesses in an ethical manner. To help them meet its expectations, MHEA is committed to working with and encouraging its partners to prevent, mitigate and face any adversity against human rights.

6. Monitoring and information channel

Any indication of the existence of actions or omissions of processes in breach of the guidelines established in this Policy should be reported immediately through the confidential whistleblowing channel of NH Hotel Group, accessible to all Team Members and third parties via <https://report.whistleb.com/en/portal/MHEA-hotels>

7. Related documents

- Minor Hotels Europe & Americas' Code of Conduct
- Minor Hotels Europe & Americas' Corporate Responsibility Policy
- Minor Hotels Europe & Americas' Environmental and Energy Policy
- Coperama Code of Conduct
- Minor Hotels Europe & Americas' Anti-Fraud & Corruption Policy
- Minor Hotels Europe & Americas' Policy on prevention of money laundering and terrorist financing

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8. Version control

Versión	Revisado por	Aprobado por	Fecha
1	Sustainable Business Department and Compliance Departement	Board of Dierctors	07/20/2020

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