

OCCUPATIONAL HEALTH AND SAFETY POLICY

1. Introduction

This Occupational Health and Safety Policy (the “Policy”) was approved by the Executive Sustainability Committee of Minor Hotels Europe & Americas, S.A. (the “Company” or “MHEA”) on July 12, 2023 and includes the general principles that will assure an occupational health and safety management model and occupational wellbeing in the everyday tasks of all the Company’s workers.

The contents of this Policy are established notwithstanding any specific additional regulation that may be approved in relation to occupational health and safety and wellbeing and notwithstanding any local labor regulations that may be applicable in the countries where the MHEA carries on its activity.

It has been drawn up with the aim of establishing a common framework for the control and management of occupational health and safety.

2. Scope

As the leading chain in the urban hotel sector, Minor Europe & Americas carries on its activity by offering a broad and diverse range of hotel propositions connected to the needs and wishes of modern global travelers with the aim of integrating responsible management in its operations. In this regard, it seeks to provide and offer sustainable, consistent and efficient services for its stakeholders.

With this objective in mind, this Policy develops the Company’s principles and commitments in relation to occupational health and safety in line with the values and guidelines defined in the Company’s Code of Conduct which sets out the “*Commitment to the safety and health of people*”.

This Policy is applicable to the following individuals and companies:

- **Employees** of all the companies that make up the Company, independently of the type of contract regulating their employment relationship, the post they hold or their geographical location.
- **Executives** of all the Company companies, independently of the type of contract regulating their relationship, the post they hold or their geographical location. The following will in any case be considered to be Executives:
 - Directors/Board members of the Company and its subsidiaries,
 - Members of Senior Management or of the various Committees of the Company.
- **Suppliers**, partners and collaborators to the extent that this document may be applicable to them and the Company has the capability to enforce it against third parties.

Furthermore, the application of this Policy, in full or in part, will extend to any other natural and/or legal person linked to Minor Hotels Europe & Americas for the purpose of complying with the provisions of this Policy, provided that it is possible to apply it to third parties, depending on the nature of the relationship.

MINOR HOTELS EUROPE & AMERICAS

3. Governance

The Compliance Committee is responsible for overseeing compliance with the Code of Conduct.

The Executive Sustainability Committee, which is the body charged with overseeing performance and monitoring compliance with the sustainability objectives adopted by MHEA which include matters falling under the area of occupational health and safety, has reviewed and reported favorably on the approval of this Policy.

In this regard, Senior Management undertakes to carry out the necessary actions to provide safe and healthy conditions to prevent job-related injuries and health impairment.

4. Principles

For the purposes of this Policy, the following principles are defined:

- Analyzing and identifying real and potential risks and dangers for each job (risk assessment) taking into account factors such as technical evolution, labor conditions, social relations or the influence of environmental aspects on the job.
- Developing and implementing a culture of prevention at source (preventive planning), eliminating hazards and reducing risks to workers' health.
- Providing a safe and healthy workplace, by achieving an adequate level of protection of workers' health against the hazards and risks deriving from their job conditions.
- Considering occupational health and safety and occupational wellbeing to be requisites in achieving optimal job quality.
- Regarding Occupational Risk Prevention as an integral part of the business activities and decisions, boosting any action aimed at improving working conditions.
- Integrating occupational health and safety in MHEA's entire cycle of activities, taking on board that responsibility for managing this facet lies with the entire Company and, consequently, with all the workers independently of department or hierarchical level.
- Assessing the management system and updating it regularly to assure continuous improvement, promoting the highest standards of occupational health and safety.
- Promoting the training and enabling provision all personnel in order to create a health and safety culture at work.
- Promoting consultation and participation of the MHEA's *team members* by encouraging them to contribute to compliance with the principles and commitments established in this Policy.
- Providing communication channels to encourage the involvement of all members of the Company in occupational health and safety, including subcontractors, suppliers and other stakeholders.

MINOR HOTELS EUROPE & AMERICAS

5. Commitments

In developing these Principles, the Company undertakes the following Commitments:

- To reinforce the integration of occupational risk prevention in the general business management system through continuous monitoring and assessment of occupational health and safety risks and hazards in all the MHEA's activities.
- To update and continuously improve the health and safety and occupational wellbeing management model, aiming to eliminate hazards and reducing occupational risks.
- To develop and implement a corporate Occupational Risk Prevention Plan taking into consideration the diverse factors that affect each job and paying special attention to workers in situations requiring greater care (disabled workers, pregnant workers and minors).
- To maintain safe and healthy working conditions that prevent damage to and impairment of workers' physical, mental and cognitive health in order to assure healthy aging in the context of the Company's risks and opportunities.
- To adapt the choice of equipment and production methods in line with the job.
- To consider workers' knowledge of and capabilities in health and safety in assigning jobs and selecting substances, equipment and working methods.
- To integrate the health and safety of workers in the strategic management of the business, making it an element that creates value in the Company's decisions.
- To develop the necessary awareness-raising and training to develop a culture of prevention.
- To provide appropriate resources and tools to improve workers' skills so that they are aware of the risks related to their job and duties.
- To assess and measure performance in health and safety on a regular basis, analyzing its evolution.
- To study in more depth the cause-source of instances of damage to occupational health that occur in order to develop the pertinent preventive and corrective measures.
- To promote social participation and the effective involvement of all workers and their representatives in the entire occupational health and safety management system and in occupational wellbeing.
- To guarantee the implementation of plans for adequate management in emergency situations, both in hotels and offices.
- To establish and maintain relationships of close collaboration with the different Public and Private bodies with responsibility for occupational health and safety, with the aim of developing best practice wherever the Company carries on its activity.
- To assure compliance with the applicable legal requisites, and with other standards and recommendations on the matter, such as the regulations of the World Labor Organization (WLO) and the internal regulations on occupational health and safety of each workplace in the Company.

MINOR HOTELS EUROPE & AMERICAS

- To participate in national and international initiatives, ratings and indices related to occupational health and safety.

6. Monitoring and information channel

The results of this Policy will be set out each year in the Sustainability Report or equivalent, which will take into consideration the Company’s risk maps, the evolution of stakeholders’ expectations, the Company’s strategy and ruling legislation, and will include the specific actions and initiatives to be carried out in line with each principle of action.

Any sign of actions or omissions that might entail a breach of the rules included in this Policy should be reported immediately through the Minor Hotels Europe & Americas whistleblowing channel, which is accessible to all team members and to third parties, through <https://report.whistleb.com/en/portal/nh-hotels>

Notwithstanding the above, this Policy will be elaborated on and supplemented by the different policies approved in the MHEA that are directly related to the general principles set out.

The Occupational Health and Safety Policy will be disclosed within the organization and to stakeholders, ensuring that it is available, updated and known to all stakeholders.

7. Related documents

- Minor Hotels Europe & Americas, S.A. Code of Conduct
- Minor Hotels Europe & Americas, S.A. Human Rights Policy
- Minor Hotels Europe & Americas, S.A. Sustainability Policy
- Minor Hotels Europe & Americas, S.A. Environment and Climate Change Policy
- Minor Hotels Europe & Americas, S.A. Information Security Policy

8. Change history

Version	Reviewed by	Approved by	Date
1.1	HR Department and Sustainability Department	Executive Sustainability Committee	07/12/2023