

## **The Organisations' Code of Ethics and Conduct**

### **a. Purpose**

Constance Hotels Services Ltd ('Company') values the reputation it has earned over the years through the proper conduct of its business. It makes every effort to maintain these high standards of business ethics. The Company strives to provide a place where:

- Its people feel proud to work;
- Its guests want to come back;
- Its business partners find trust; and
- Value is created for its Shareholders.

The Company's Code of Ethics and Conduct is a compilation and reaffirmation of the values, principles and ethical standards that have guided the Company over the years and which are expected to guide each and every Team Member throughout his/her journey with the Company.

The message relayed by the Company's Code of Ethics and Conduct is clear: All Team Members must strictly comply/adhere with applicable laws, regulations, good governance practices, policies, codes and the prescribed ethical conduct.

Although the Code of Ethics and Conduct is regularly reviewed and updated, it does not describe all the laws the Company is subject to and does not cover all ethical issues. Team Members are consequently requested to refer to and comply with the laws and regulations, as well as the policies and procedures applicable at their respective place of business. If in doubt, they may seek guidance from their Supervisor/Department Head/HR Manager or from the Risk and Compliance Manager.

### **b. Scope of Application**

The Code of Ethics and Conduct applies to all Team Members working at the Company and its subsidiaries, including its corporate office, training centre, sales offices and local and overseas properties managed by Constance Hospitality Management Ltd.

### c. Structure and Content

The Code of Ethics and Conduct is structured in 9 distinct sections as follows:

Section	Sub-Section	Description
1. Culture of Integrity	Role of Leadership	<ul style="list-style-type: none"> <li>Leaders to lead by example and promote ethical conduct.</li> </ul>
2. Personal Conduct	N.A	<ul style="list-style-type: none"> <li>The general personal conduct to be adopted by each Team Member.</li> </ul>
3. Workplace Environment	Health & Safety	<ul style="list-style-type: none"> <li>Compliance with Health &amp; Safety laws, policy and procedures, and acting responsibly.</li> </ul>
	Harassment Free Workplace	<ul style="list-style-type: none"> <li>Prohibition of any form of harassment or discrimination.</li> </ul>
	Security	<ul style="list-style-type: none"> <li>Escalation of information about security risks.</li> </ul>
	Diversity	<ul style="list-style-type: none"> <li>Promotion of a diverse and inclusive working environment.</li> </ul>
	Smoke Free	<ul style="list-style-type: none"> <li>Smoking permitted only in designated areas.</li> </ul>
	Substance Abuse	<ul style="list-style-type: none"> <li>Prohibition of drugs and alcohol on Company premises or while on Company business for Team Members.</li> </ul>
	Teamwork	<ul style="list-style-type: none"> <li>Promotion of a teamwork culture.</li> </ul>
	Grievance Reporting	<ul style="list-style-type: none"> <li>Procedure for reporting of grievances, inconsistencies with or breaches of this Code and Laws.</li> </ul>
4. Conflicts of Interest	N.A	<ul style="list-style-type: none"> <li>The different ways in which a conflict of interest can arise and how these can be avoided or managed.</li> </ul>
5. Proper Use of Company Assets	Proper Use of all Assets	<ul style="list-style-type: none"> <li>Proper and efficient use of all assets defined as Company assets</li> </ul>
	Computer Access, Internet Usage and Electronic Mailing	<ul style="list-style-type: none"> <li>Company's IT equipment, software and other IT facilities should be used in accordance with the IT Code of Practice.</li> </ul>
6. Confidentiality & Data Privacy	N.A	<ul style="list-style-type: none"> <li>Protection of Company information and handling of personal data of employees and non-employees in line with data protection laws.</li> </ul>
7. Responsible Citizenship	Environment	<ul style="list-style-type: none"> <li>Team members should adopt an environment-friendly behaviour.</li> </ul>
	Green Procurement	<ul style="list-style-type: none"> <li>Greening of the Company's supply chain and Compliance with the Code of Ethics and Conduct for Business Partners.</li> </ul>
	Human Rights	<ul style="list-style-type: none"> <li>Promotion of human rights.</li> </ul>
8. Business Practices	Contractual Commitments	<ul style="list-style-type: none"> <li>Respect of contractual commitments by the Company.</li> </ul>
	Equal Opportunity	<ul style="list-style-type: none"> <li>Equal opportunity policy across the organisation.</li> </ul>
	Retirement and Redundancy	<ul style="list-style-type: none"> <li>Retirement and redundancy handled in accordance with local labour laws and regulations.</li> </ul>
	Communication	<ul style="list-style-type: none"> <li>Open and honest communication approach.</li> </ul>
	Risk Management	<ul style="list-style-type: none"> <li>A proactive approach to risk management.</li> </ul>
	Intellectual Property	<ul style="list-style-type: none"> <li>Creations and inventions developed in the course of employment are treated as absolute property of the Company.</li> </ul>
	Competition/Antitrust	<ul style="list-style-type: none"> <li>Compliance with competition and antitrust laws.</li> </ul>
	Anti-Money Laundering	<ul style="list-style-type: none"> <li>Compliance with all laws, rules and regulations to combat money laundering and terrorism financing.</li> </ul>
	Integrity of Records and Reports	<ul style="list-style-type: none"> <li>Maintenance of complete and accurate records and accounts and reporting in accordance with professional accounting standards and local regulatory requirements.</li> </ul>
	Shareholders and the Investment Community	<ul style="list-style-type: none"> <li>Communication of true and accurate information on the Company's achievements and prospects to Shareholders and the investment community.</li> </ul>
9. Compliance	Political Involvement and Contributions	<ul style="list-style-type: none"> <li>Any political contribution by the Company to be approved by the Board.</li> </ul>