

CONSTANCE HOTELS SERVICES LIMITED

Code of Ethics and Conduct for Employees

a. Purpose

As stated by its Chief Executive Officer, Constance Hotels Services Ltd (*the '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 and 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 meant 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 Compliance Officer.

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 10 distinct sections, which are summarised in the table below:

Section	Sub-Section	Description
1. Culture of Integrity	Role of Leadership	Leaders to lead by example and promote ethical conduct.
2. Personal Conduct	Employees Conduct	The general personal conduct to be adopted by each Team Member.
3. Workplace Environment	Health & Safety	Compliance with Health & Safety laws, policy and procedures, and acting responsibly.
	Harassment Free Workplace	Prohibition of any form of harassment or discrimination.
	Security	Escalation of information about security risks.
	Diversity	Promotion of a diverse and inclusive working environment.
	Smoke Free	Smoking permitted only in designated areas.
	Substance Abuse	Prohibition of drugs and alcohol on Company premises or while on Company business for Team Members.
	Teamwork	Promotion of a teamwork culture.
	Grievance Reporting / Whistleblowing	Procedure for reporting grievances, inconsistencies with or breaches of this Code and Laws.
4. Conflicts of Interest	Gifts, Outside Activities, Personal Relationships, Insider dealing, etc.	The different ways in which conflict of interest can arise and how these can be avoided or managed.
5. Proper Use of Company Assets	Proper Use of all Assets	Proper and efficient use of all assets defined as Company assets
	Computer Access, Internet Usage and Electronic Mailing	Company's IT equipment, software and other IT facilities should be used in accordance with the IT Code of Practice.
6. Confidentiality & Data Privacy	Company information / Personal data	Employees' responsibility to safeguard Company information and the handling of personal data of employees and non-employees in line with data protection laws.
7. Responsible Citizenship	Environment	Team members should adopt environmentally responsible behaviours.
	Green Procurement	Greening of the Company's supply chain and compliance with the Code of Ethics and Conduct for Business Partners.
	Human Rights	Promotion of human rights.
8. Business Practices	Contractual Commitments	Respect of contractual commitments by the Company.
	Equal Opportunity	Equal opportunity policy across the organisation.
	Retirement and Redundancy	Retirement and redundancy are handled in accordance with local labour laws and regulations.
	Communication	Open and honest communication approach.
	Risk Management	A proactive approach to risk management.
	Intellectual Property	Creations and inventions developed in the course of employment are treated as absolute property of the Company.
	Competition/Antitrust	Compliance with competition and antitrust laws.
	Anti-Money Laundering /CFT	Compliance with all laws, rules and regulations to combat money laundering and terrorism/proliferation financing.
	Integrity of Records and Reports	Maintenance of complete and accurate records and accounts and reporting in accordance with professional accounting standards and local regulatory requirements.
	Shareholders and Investment Community / Political Involvement	Communication of true and accurate information on the Company's achievements and prospects to Shareholders and the investment community. Any political contribution by the Company to be approved by the Board.
9/10 Compliance / Ethical Dilemma	Compliance / Ethical Dilemma	The responsibilities of the different parties in the proper administration of the Code of Ethics and Conduct and reporting of any unethical conduct (whistleblowing). How the employee can resolve an Ethical dilemma.