

**COMPLIANCE** 

# Barceló Group Code of Ethics

**MAY 2023** 





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## 1. Introduction

## 1.1 Objective of the Code of Ethics

The "Code of Ethics of the Barceló Group" (hereinafter the "Code") is the updating and rewording, in a single document, of the documents "Mission, Vision and Values" and the "Code of Ethics", approved by the Board of Directors of the Barceló Group in 2002 and 2010, respectively.

This Code of Ethics establishes the lines of conduct that all Barceló Group employees must apply in their professional activities. Thus, the objective of this Code is to **ensure professional**, **ethical and responsible behaviour of all Barceló Group employees** in the development of the company's activities anywhere in the world.

The standards and guidelines described in this Code of Ethics are closely related to the deep-rooted cultural aspects of our Company, those that have made us a leading and recognised company in our business sector, and those that should continue to contribute to our sustainable growth in the future.

This Code of Ethics may be subject to extension and amendment, as proposed to, and approved by, the Board of Directors.

## 1.2 Scope

The Code is applicable to all the companies that make up the Barceló Group and binds all staff, regardless of their position and function, who have an obligation to be familiar with the Code, comply with it and collaborate to facilitate its implementation.

In addition, the application of the Code, in whole or in part, may be extended to any natural and/or legal person related to the Barceló Group, when it is appropriate for the fulfilment of its purpose and is possible due to the nature of the relationship.

Exemption from compliance, for duly justified specific cases, may only be authorised by the Global Compliance Committee, which must immediately report to the Audit Committee and/or the Board of Directors.



# 2. General Principles

## 2.1 Activity, vision and strategic vocation

The activity of the Barceló Group is the development of different tourism businesses, which are vertically integrated into a single corporate structure. Its vision is to be a **profitable**, international and customer satisfaction-oriented hotel and travel group.

Although its main interests are hotel operations and retail and inbound networks, the Barceló Group is open to participation in other companies in order to diversify into other tourism-related areas. The Group also endeavours to leverage its **experience as a hotel and travel agency manager**, as well as the knowledge derived from this activity, to franchise the brand and engage in the developments derived therefrom.

The Barceló Group has an **eminently family character**, which will manifest itself in its governance, as well as, normally, in the majority ownership of the capital of its core business, hotel management. In other non-core activities, such as real estate or any other parallel business, the group is open to holding minority stakes.

The Barceló Group's **vocation is to establish long-lasting businesses**, beyond contingencies, therefore it does not consider speculative activities. Its business approaches will seek the **consolidation of a stable, sustainable company,** capable of outliving its current managers.

## 2.2 Corporate objectives and values

The **priority objectives** of the Barceló Group are to position the Group as a leading name and company benchmark in the national and international tourism sector; to ensure that each and every one of its projects is profitable; to assert its extensive experience in holiday and urban hotel management; to meet the expectations of its main customers (guests, shareholders, employees, partners and collaborators, suppliers and public administrations); to take advantage of business opportunities, open new markets and be pioneers in the launch of new and innovative products and services; to contribute to the welfare and social, political and economic development of the countries in which it is present.

As a basis for achieving these objectives, the Barceló Group and all its members develop the following **corporate values** on a daily basis:

#### Responsibility

- Honesty
- Leadership

#### Spirit of service



- Enthusiasm
- Teamwork.

#### Flexibility

- Efficiency
- Effectiveness

# 3. Commitment to Ethical and Responsible Conduct

Being ethical with each other
Being ethical with our customers and suppliers
Being ethical with our shareholders
Be ethical with our competitors and with the authorities
Being Ethical with the community

## 3.1 Being Ethical with each other

#### Compliance with rules, agreements and commitments

Compliance with the regulations in force is a necessary precondition for this Code. All Barceló Group employees must comply with the legislation in force in each of the countries in which the Group operates. Under no circumstances shall the application of the Code imply any breach of the legal provisions in force in the countries where the Group operates.

All Barceló Group employees must comply with the company's rules and procedures, as well as the instructions that may be approved in the exercise thereof. The Barceló Group undertakes to provide the necessary resources for its employees and managers to know and understand the internal and external regulations necessary for the exercise of their functions.

Any other local Codes of Conduct that may exist shall be aligned and adapted to the criteria set out in this Code, which shall prevail over any other internal rules, unless the latter are more demanding. Such local Codes and the instruments for their implementation shall be approved in advance by the Board of Directors of the Group.

The Barceló Group carries out its activities within a framework of **commitment to society and the environment** and therefore assumes, as part of its internal regulations, the content of the agreements and conventions, national or international, to which it has adhered, committing itself to their promotion and compliance.



A list of the main agreements and conventions is attached to this Code as Annex I, which will be continuously updated over time.

Therefore, the **Barceló Group** assumes and makes its own **the principles of the Global Compact** coordinated by the United Nations Culture Association with all its consequences, which are developed in different ways through this Code of Ethics (See Annex II for details of the Principles).

#### Relationships between employees

In our day-to-day dealings with other colleagues, regardless of their level in the organisation, **respect and consideration** should prevail at all times. We will treat others as we would like to be treated, being considerate of the differences that may exist between people and not allowing any form of violence, harassment or abuse at work.

#### Superior-subordinate relations

- Lead by example.
- Highlight the successes.
- Comment on errors.
- Be courteous.
- Teaching by transmitting knowledge and experience.
- Collaborate in problem solving.

#### Subordinate-superior relations

- Be respectful and disciplined.
- Show a willingness to learn.
- Convey concerns about the work.

Staff integration with the management team should be encouraged and **opportunities for internal promotion should be provided**. Such internal promotion is preferred to the recruitment of external staff but does not affect the future of the Group. **Ongoing training programmes** will be established to maximise the professionalism of staff.

The cost of such training may be borne by the employee, shared between the company and the employee, or borne entirely by the Group.

The Group's employees will be remunerated according to the results and efficiency demonstrated throughout their time in the company, and must have a proactive attitude, looking for new sources of income, proposing improvements, collaborating with other areas, etc.



We will carry out the tasks and responsibilities assigned to us at all times, giving them our utmost attention during our working day. We will not waste time unjustifiably or spend it on unproductive tasks that do not bring clear positive results to the management of the Group.

We will behave in a manner that is in keeping with our position at all times, accepting responsibility for our actions, carrying out our work with the utmost dedication, and collaborating in strict compliance with applicable labour regulations and in the prevention, detection and eradication of irregularities in this area. All employees are responsible for strict compliance with occupational health and safety standards and for ensuring the safety of themselves and others affected by our activities and must at all times comply with applicable occupational health and safety precautions.

In short, those of us who form part of the Barceló Group must have a good professional aptitude and be responsible, honest, loyal to the company and with a great capacity for work.

#### Collaboration

The Barceló Group's global achievements are the sum of all our individual achievements.

We will try to help others achieve their objectives whenever we can, providing solutions and avoiding confrontations or power struggles between people or departments at all times. Sharing information and knowledge is recommended and necessary for the Barceló Group to achieve its objectives.

The Group's organisation will be based on a structure with clear roles, with clear job definitions, with the assumption of tasks and responsibilities by the different levels, respect for the chain of command, with the promotion of teamwork and, in particular, creative contributions from all levels of the company.

Each manager must participate in the formulation of the objectives of his or her department, company or division, must be aware of the objectives of the other companies involved, and must involve his or her team in this process. The managers of the group companies will have an exclusive dedication to the Group. Their responsibilities include upholding the **confidentiality** of the group's information, documentation and know-how.

#### A discrimination and harassment-free space

Both the recruitment of new employees and the promotion of current employees shall be governed exclusively by **criteria of professional ability**, **availability**, **effort**, **knowledge**, **experience and capacity** to perform a job. There shall be no discrimination on the grounds of sex, beliefs, religion or any other personal or social condition unrelated to their merit and ability, with special consideration for the care and integration of people with disabilities in the workplace.

The Group attaches fundamental importance to ensuring that all individuals have their freedom respected and does not tolerate any conduct that could constitute harassment. This way, we undertake to maintain prevention and reaction mechanisms to protect



professionals from any form of psychological, moral, sexual or gender-based harassment, or for any other reason contrary to recognised public rights and freedoms.

#### **Conflict of interest**

We must not allow our personal or family relationships to influence a Group business decision. We will not influence the company to hire or do business with third parties related to us, unless it is objectively considered to be the best option for the company, following the policies established for access to the company by family members of directors and shareholders at all times. The Human Resources Division will monitor and approve, as appropriate, all such recruitments at managerial level.

In any case, it is not permitted to have a family member under direct supervision.

No Barceló employee may use his or her position in the company to obtain property or personal advantages or business opportunities of his or her own, nor may he or she provide services as a consultant, advisor, manager, employee or advisor to another competing company, with the exception of services that may be provided at the request of Barceló or with the authorisation of the Human Resources Division. There will be no special treatment or working conditions based on personal or family relationships.

The Barceló Group respects the private life of staff and consequently the private sphere of their decisions. Within the framework of this policy of respect, employees and managers are urged to inform the Human Resources in the event of any personal or family conflicts of interest that may compromise the necessary objectivity or professionalism of their role in Barceló, so that, with respect for the confidentiality and privacy of individuals, the appropriate measures can be taken for the benefit of both the company and the individuals concerned.

Specifically, the following are potential situations of conflict and must be reported immediately to Human Resources:

- The performance by the employee or by persons related to him/her, directly or indirectly, by him/herself or through any company or institution, of activities that constitute the same, similar or complementary type of activity as that carried out by Barceló.
- The performance by the employee or by persons related to him/her, directly or indirectly, by him/her or through a company or institution, of activities that generate the exchange of goods and/or services with Barceló, whatever the agreed remuneration system.

Therefore, all our professional efforts must be dedicated to the Barceló Group, except for others we may engage in outside our working day and that do not affect our performance. Specifically, and even outside our working day at Barceló Group, we cannot work in any way for companies that are our competitors.

## 3.2 Being ethical with our clients



All the activity of the Barceló Group companies is based on **knowing the customer and their needs**, and on the satisfaction of these needs through appropriate products and services. An optimal product should be achieved in relation to the price paid for it.

#### Service and quality

The essence of our business is to provide our customers with the **right quality of service for the price they pay**. We work for them, and they must set the order of priority for our actions. Any work or task is secondary to the need to provide a service or serve a customer, and this should be borne in mind by both customer-facing employees and their managers when assigning tasks or demanding accountability.

In the conduct of their activity, Barceló employees shall promote the Company's services on the basis of objective standards, without misrepresenting their conditions or characteristics. The Company's promotional activities shall be conducted in a clear manner so as not to provide false, misleading or deceptive information to customers or third parties.

In all cases, the Barceló Group will develop mechanisms to detect possible customer dissatisfaction and will always offer the **best quality and price**, ultimately seeking to ensure customer **loyalty to the chain**, in one of the many possible ways.

#### **Customer relationships**

Guests arriving at our hotels expect to be treated in accordance with their expectations, so we must be attentive to their needs, anticipating them where possible. None of our tasks is more important than this one. Complaints should be dealt with diligently and politely, apologising and trying to solve the problem as soon as possible.

When engaging with customers, all employees must act in accordance with criteria of consideration, respect and dignity, taking into account the different cultural sensitivity of each person with no discrimination in treatment on the grounds of race, religion, age, nationality, sex or any other personal or social condition prohibited by law, with special consideration for the care of persons with disabilities.

#### Confidentiality of information and personal data protection

A customer is not a friend or a colleague: he or she is someone who pays for a service and who wants to see his or her privacy and peace of mind preserved. We must not be overconfident in our dealings, nor invade their privacy unnecessarily. In particular, we will treat any information relating to customers with the utmost confidentiality.

In general, we have an obligation to **respect the personal and family privacy of all persons**, both employees and customers and any other persons to whose data they have access as a result of the Group's own activity, which must include personal, medical, financial or any other type of data that may in any way affect the intimate and personal sphere of the data subject.



All personal data shall be treated in a particularly restrictive manner, so that:

- 1. Only those that are necessary will be collected.
- The collection, computer processing and use are carried out in such a way as to guarantee their security, truthfulness and accuracy, the right to privacy of individuals and compliance with the Group's obligations resulting from the applicable regulations.
- 3. Only employees authorised to do so by virtue of their duties shall have access to such data to the extent necessary.

The obligation of confidentiality will remain after the end of the activity at Barceló.

#### **Security**

All products and services that our customers receive must be absolutely safe for their health, and at all times we will ensure that our actions do not put their well-being and safety at the slightest risk, and that we **comply** with the applicable **standards and procedures**.

All Barceló staff are obliged to ensure the security of the means of payment used in hotels, agencies and other establishments of the company, physical and online, to ensure the correct functioning and traceability of billing and collection procedures, the protection of customer data and the prevention of fraud.

#### **Supplier relations**

Employees shall also deal with suppliers of goods and services in a **lawful**, **ethical and respectful manner**. The selection of suppliers shall be governed by criteria of objectivity and transparency, reconciling the Company's interest in obtaining the best conditions with the convenience of maintaining stable relations with ethical and responsible suppliers. Barceló employees and, especially, those involved in decisions regarding the contracting of supplies or services or establishing their economic conditions, will avoid any form of interference that could affect their impartiality or objectivity in this regard. Exclusive relationships should be avoided wherever possible.

Provided their value is not clearly excessive, it is generally accepted practice to receive promotional gifts from customers or suppliers that are proportionate and reasonable according to local practice, transparent, given for legitimate interests, socially acceptable, and sporadic, so that their content or regularity would not lead an independent third party to doubt the good faith of the employee or the company. We will never accept gifts of a high value, or those in which we see an intention to impose on us an immediate or future commitment, or which may influence business decisions to be made by the recipient. We will never accept cash payments or gifts of any kind, except for the usual gratuities in the case of employees in direct contact with the customer.



## 3.3 Being ethical with our shareholders

#### **Register of operations**

All material transactions carried out by the company shall be clearly and accurately recorded in the correct accounting records which give a **true and fair view of the transactions** and shall be available to internal and external auditors.

In any event, we will enter **financial information** into the company's systems in a **complete**, **clear and accurate** manner so that it reflects, as of the relevant date, our rights and obligations in accordance with applicable regulations.

#### **Duty of secrecy**

In general, employees must maintain professional secrecy with regard to any non-public data or information that comes to our knowledge as a result of our professional activity, whether it originates from or relates to customers, the Group, other employees or executives or any other third party. Such data or information shall be used exclusively for the performance of their professional activity within the Group, shall be provided only to other professionals who need it for the same purpose, and shall not be used for their own benefit.

We shall at all times safeguard **internal Company information**, keep it secure and prevent access to it by outsiders. Inside company information shall be understood as information that has not been disclosed to the general public. We will not use for our own benefit, or that of family members or acquaintances, any inside company information that may affect investment decisions.

This obligation of secrecy remains even if we cease to form part of the Barceló Group and will include the obligation to return any material related to the company that the employee has in his or her possession at the time of termination of the employment relationship with the company.

The above paragraphs are without prejudice to the fulfilment of requirements formulated by the competent authorities in accordance with the applicable regulations.

#### **External relations**

Employees shall refrain from transmitting, on their own initiative or at the request of third parties, any information or news about the Group or third parties to the media, referring in any case to the Communications Division. They **will** also **avoid spreading comments or rumours about the company**.

#### Use of Company goods and services



We are responsible for protecting and maintaining company assets and resources entrusted to us or falling under our responsibility. Such assets or working tools shall be used only for the lawful purposes of our business, as they are assets for the exclusive use of our business, and as efficiently as possible. We will impose no disposition or encumbrance on the Group's assets without the appropriate authorisation, nor any act of disposal, transfer or concealment of any property owned by Barceló for the purpose of avoiding compliance with the Group's liabilities to its creditors.

We will provide special protection for computer systems, taking the utmost care to ensure their security. Under no circumstances shall we make use of the equipment made available by the Company to install or download programmes, applications or contents whose use is illegal, which contravene the Company's rules, or which may damage its reputation. Nor shall we use Company funds or cards to pay for activities that do not form part of their professional activity. We will be prudent in our spending, and neat and tidy in our working environment. The Group, in its duty to supervise compliance with regulations, has the power to monitor internal processes, appropriate use of corporate devices or other intangible assets owned by the Group, while preserving the principle of proportionality.

The Barceló Group has two central bases in its management policy: minimisation of expenses and maximisation of income. Group companies will develop cost structures that are lower than those of competitors, both in good economic times and in times of crisis. High standards are set throughout the organisation, with rigorous monitoring and an emphasis on cost reduction, strict control and timely purchasing. Employees will therefore ensure that expenditure is incurred in strict accordance with requirements.

The Barceló Group will develop a policy of maximum exploitation of the commercial possibilities of its available resources, which is equivalent to a reasonably aggressive commercial strategy that allows us to obtain maximum income at all times, both in the core business and in all parallel activities derived from the main business. The Barceló Group's management, focused on cost reduction and revenue optimisation, will be **defined by a medium-term strategic approach**, so that cyclical events do not alter these approaches.

## 3.4 Being ethical with our competitors

#### Honesty and collaboration

We will not seek to obtain information from our competitors using unlawful or unethical methods and will reject information that has been obtained improperly or in breach of the confidentiality under which it is held by its rightful owners. In particular, special care shall be taken not to violate company secrets in cases where professionals from other companies in the sector join Barceló. We will not disclose malicious or false information for the purpose of damaging the image or reputation of a competitor.

Maintaining good collaborative with our competitors can be very advantageous for our company's performance. The aim will be to foster such relations, including the exchange of information that is not considered internal and that contributes to better management of our



area of responsibility. We will inform our line manager of possible developments in competitor companies, which may bring benefits to our organisation.

#### **Relationships with authorities**

Barceló employees shall deal with public authorities and institutions where they carry out their activities in a lawful, ethical, respectful and committed manner in accordance with the guidelines for the prevention of corruption and bribery. Employees dealing with representatives of public administrations must be specifically authorised by the company and document the decisions taken.

It is expressly forbidden to offer, grant, request or accept, directly or indirectly, gifts or handouts, favours or compensation, whatever their nature, to or from any authorities, public officials or employees or managers of public companies or bodies, whether in Spain or in any other country. Exceptions to the above rule are only gifts and hospitality of low value that are proportionate and reasonable according to local practice, transparent, provided for legitimate, socially acceptable reasons, are sporadic, so that their content or regularity would not lead an independent third party to doubt the good faith of the employee or the company. Cash gifts are expressly prohibited.

It is the responsibility of each employee to **know and properly assess local practices**, considering the interest and good reputation of the company. If in doubt, the Global Compliance Committee should be consulted.

## 3.5 Being ethical with the community

#### **Environmental protection**

We assume our responsibility for the protection of the environment and are aware of the need to preserve the natural environment wherever we do business. In accordance with this, the Barceló Group develops its tourism activity under the principle of environmental sustainability, which requires that the viability of the projects be compared from the point of view of preserving the environment. Therefore, our constructions will try to integrate as well as possible into the surroundings, with the least possible visual and environmental impact. Hotels already in operation will promote all initiatives that contribute to the preservation of the environment, and we will set an example in caring for the environment of these hotels.

All Group employees, within the scope of their responsibilities, must actively and responsibly commit themselves to environmental conservation, respecting legal requirements and following the recommendations and procedures established by the Group to reduce the environmental impact of its activities.

#### Social commitment



We will be conscious at all times that we are one in the countries where we do business. We will promote service actions towards these communities, to the extent that we can contribute to improving the quality of life of their inhabitants, and provided that such contribution is related to the purpose of our business. The viability of the projects must also be checked from the point of view of the link between the business and the local population in which the activity is carried out, and in accordance with international regulations.

We will promote the growth and development of the communities where we are located, in whatever way we can. In particular, we will promote local employment, vocational training, education, hygiene and opportunities for personal and professional development of the community's citizens. We will also purchase local products and services provided they are competitive in terms of cost and quality.

Our business activity will seek maximum harmony with the attributes and traditions of the regions and countries where it is carried out, respecting their laws, customs and traditions.

#### **Protection of Intellectual and Industrial Property**

We are committed to the protection of our own and others' intellectual and industrial property. This includes, inter alia, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights and know-how rights.

Barceló employees shall respect the intellectual property and the right of use that corresponds to the Group in relation to the works developed or created in the Group, as a result of their professional activity or that of third parties. Therefore, they shall be used in the exercise of professional activity in the same and all the material on which they are supported shall be returned when they are required.

They shall not use the Group's image, name or trademarks except for the correct performance of their professional activity within the Group. In this regard, the creation, membership, participation or collaboration by Barceló employees on social media, forums or blogs on the Internet and the opinions or statements made therein shall be made in such a way that their personal nature is clear. In any case, Barceló employees must refrain from using the image, name or brands of the Group to open accounts or register on these forums and networks.

Barceló personnel shall also respect the intellectual and industrial property rights held by third parties outside the Group and therefore are expressly prohibited from using works, creations or distinctive signs of intellectual or industrial property of third parties without proof that the company has the corresponding rights and/or licences. The use of brand names, images and texts in advertising and marketing must be approved by the department responsible for corporate communication.

The intellectual and industrial property resulting from the work of employees during their tenure with the Company, and which is related to the current and future business of Barceló, shall be the property of the company.



## Tax obligations

Barceló employees will avoid all practices that involve the illegal evasion of taxes to the detriment of the Public Treasury. Similarly, we will avoid the use of opaque structures for tax purposes at all times, understood as those in which, by imposing special purpose vehicles through tax havens or territories that do not cooperate with the tax authorities, they are designed to prevent the tax authorities from finding out who is ultimately responsible for the activities or the ultimate owner of the assets or rights involved.

We will also avoid obtaining undue advantages in tax matters and ensure that the tax information declared to the authorities is accurate and reflects the company's reality. We will also ensure that any aid that may be requested from or received from public administrations is used appropriately, and that the application is transparent, avoiding misrepresenting the conditions for obtaining it or using it for purposes other than those for which it was granted.

# 4. Complying with the Code of Ethics

We must ensure compliance with this Code of Ethics at all times, which implies a rejection of any tourist or related activity that could be an aggression against human rights or the dignity of people, with special focus to minors.

To this end, there is a Global Compliance Committee responsible for supervising compliance with the principles of action and rules of conduct set out in the Code of Ethics.

In the exercise of its functions, the Global Compliance Committee shall ensure:

- a) The confidentiality of all data and background information handled and of the proceedings carried out unless the law or a court order requires the transmission of information.
- b) The exhaustive analysis of any data, information or documents on the basis of which its action is promoted.
- c) The investigation of a procedure appropriate to the circumstances of the case, which shall always act independently and with full respect for the rights and guarantees set out in the Internal Information System Policy of any affected person.
- d) The indemnity of any whistleblower as a consequence of submitting a complaint to the Global Compliance Committee.

The Global Compliance Committee may act on its own initiative or at the request of any employee or third party with sufficient interest by means of a complaint made in good faith and shall have the necessary means to guarantee the application of this Code, all in accordance with section six below and with internal regulations. Its decisions will be binding on Barceló companies and employees.

Failure to comply with the Code of Ethics may give rise to labour sanctions or any other applicable regulations, without prejudice to any administrative or criminal sanctions that may also result.



## 5. Distributing the Code of Ethics

The Code will be made available to all employees in their own language, will remain published on the Barceló Intranet and will be the object of appropriate communication, training and awareness-raising actions for timely understanding and implementation throughout the organisation.

In particular, the Code will be notified personally to all Barceló Group directors and executives and to any person representing them, when required by the nature of their relationship, who must make a commitment in writing to comply with it. Furthermore, the obligation to comply with the Code shall be expressly stated in the employment contracts of the employees.

Human Resources shall ensure that all employees and persons who for any reason must be subject to the rules of this Code are properly informed of their adherence to it.

# 6. Internal Information System: Whistleblowing and/or Queries

The Code establishes the principle of due diligence for the prevention, detection and eradication of irregular conduct, whatever the nature thereof. Therefore, if in doubt when interpreting any of the rules described in this Code of Ethics, or regarding any other aspect or behaviour that is not included and that may fall within its scope of action, queries may be raised or irregularities reported through the Whistleblower and Query Channel, which is regulated in the Internal Whistleblower Information and Protection System Policy, as well as in the internal development regulations.

On the other hand, any employee who is accused, charged or accused in criminal proceedings must inform Human Resources or the Global Compliance Committee as soon as possible. Similarly, employees must inform Human Resources or the Global Compliance Committee of any administrative proceedings affecting them, whether as alleged perpetrators, witnesses or otherwise, which are processed by the authorities or bodies supervising the activities of the Group companies, even if the participation in such proceedings does not arise from their professional performance.



## **ANNEXES**

# **ANNEX I: Global codes and commitments voluntarily assumed by Barceló**

- Code of Conduct for the Protection of Children and Adolescents against Sexual Exploitation in the Travel and Tourism Industry, signed with the Catalan Association for Abused Children (ACIM).
- United Nations Global Compact (UN Global Compact) managed by the Spanish Global Compact Association (ASEPAM).



## **ANNEX II: The Principles of the Global Compact**

The Global Compact calls on companies to adopt, support and promote, within their sphere of influence, a set of core values in the areas of human rights, labour standards and the environment. The principles are as follows:

#### Human Rights:

- 1. Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2. Make sure that they are not complicit in human rights abuses.

#### Labour Standards:

- 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4. The elimination of all forms of forced and compulsory labour;
- 5. The effective abolition of child labour; and
- 6. The elimination of discrimination in respect of employment and occupation.

#### **Environment**

- 7. Businesses should support a precautionary approach to environmental challenges;
- 8. Undertake initiatives to promote greater environmental responsibility; and
- 9. Encourage the development and diffusion of environmentally friendly technologies.

#### Anti-Corruption:

10. Businesses should work against corruption in all its forms, including extortion and bribery.



## **ANNEX III: Terminology**

For the purposes of this agreement, the following terms are defined as stated below:

**Barceló Group**: All the companies comprising the Barceló Group of companies worldwide. Unless otherwise stated, the expression "company" is understood to refer to each and every one of the companies included in the Barceló Group.

**Personnel or employees:** All directors, executives and other employees of Barceló, regardless of their form of contract, when they act in their capacity as such, that is to say, in the name and on behalf of or for Barceló, and whether they do so directly or indirectly, by themselves or through an intermediary or through any company or other type of controlled entity.

Related person: Any person who is in any of the following situations with Barceló staff:

- Spouse or person with an analogous relationship.
- Ascendant, descendant or sibling.
- Ascendant, descendant or sibling of the spouse or person with an analogous relationship.

**Suppliers**: Suppliers of goods and services of the Barceló Group that maintain commercial relations with Barceló.