

Code of Ethics and Conduct for Business Partners and Suppliers

At Management Hotelero Piñero (“MHP”) and all companies operating under the Bahia Principe Hotels & Resorts brand, we are committed to developing a culture based on ethics, responsibility, and respect for people and the environment.

This Code of Ethics and Conduct for Business Partners and Suppliers (this “Code”) aims to ensure that all individuals, companies, corporations, and entities collaborating with MHP and Bahia Principe are committed and uphold our values and ethical principles. This Code establishes the expected standards of behavior, regardless of any other internal rules that may apply. Therefore, it serves as the reference framework for responsible business decision-making.

If Business Partners (as this term is defined below) subcontract part of the activities they carry out for MHP or Bahia Principe, they must also ensure that such subcontractors comply with the provisions of this Code and any other applicable rules.

MHP and Bahia Principe reserve the right to modify this Code as new needs or regulatory changes arise. Business Partners are expected to review their practices at least once a year, and both MHP and Bahia Principe reserve the right to audit their compliance with this Code.

1. Scope

This Code applies to all business partners, suppliers, clients, advisors, and any person or entity maintaining a professional or commercial relationship with MHP and/or Bahia Principe (“Business Partners”), regardless of the geographical scope of the commercial relationship. Express acceptance of the content of this Code is mandatory, unless the existence of an equivalent code of ethics is proven.

There are internal supervision and control mechanisms to ensure compliance, and detailed information on the measures implemented may be requested.

2. Commitments and Ethical Principles

2.1. Compliance with the Law

- All Business Partners must comply with all applicable national and international laws and regulations, including those related to labor, health and safety, environment, ethics, and animal welfare. In case of conflict between rules, the most restrictive will apply. For example, if a local law allows a practice that international regulations prohibit, the stricter regulation will apply.
- Business Partners are also expected to immediately notify MHP of any significant non-compliance, allegations of non-compliance, or investigations by authorities related to any product or service that may substantially affect their ability to provide products or services in accordance with this Code by contacting MHP’s Compliance Office through any of the communication channels set forth in Section 4 hereto.

2.2. Human and labor rights

Business Partners must recognize and commit to defending the human rights of workers and treating them with dignity and respect. We recommend incorporating the standards established in the Universal Declaration of Human Rights, the United Nations Global Compact, Social Accountability International, and the Base Code of the Ethical Trading Initiative.

A series of measures must be met by Business Partners to ensure compliance with these regulations:

Code of Ethics and Conduct for Business Partners and Suppliers

- Freedom of employment: This must always be respected.
 - Forced labor, servitude, and human trafficking are strictly prohibited. No one working with or for us (whether directly or indirectly) should be forced to work against their will.
 - The retention of personal documents as a condition of employment is prohibited. Everyone must have the right to a private life free from coercion.
 - Workers must have the freedom to terminate their employment contract with reasonable notice.
- Prohibition of child labor: Employment of minors is not allowed.
- Non-discrimination:
 - Business Partners must ensure full compliance with national and local laws and regulations for all personnel actions, including selection, hiring, assignment, and promotion.
 - All processes involving workers will be carried out regardless of creed, race, color, age, sex, sexual orientation, ethnic origin, mental or physical disability, religion, political affiliation, medical condition, pregnancy, union affiliation, marital status, etc.
- Dignified treatment and respect:
 - Any form of harassment, abuse, exploitation, or intimidation, whether physical or mental, is prohibited. There must also be no threat related to any of these behaviors.
 - Maintaining a safe and healthy work environment is mandatory.
- Freedom of association: Business Partners will respect workers' rights to freely associate, including the right to join a union or similar organization and to communicate openly with management regarding working conditions without fear of retaliation, intimidation, or harassment.
- Wages and working hours:
 - Wages and benefits received by workers must comply with all applicable local wage laws, including those related to minimum wages, overtime, and legally required benefits.
 - Workweeks must not exceed the maximum established by applicable law or a relevant collective agreement. Enjoyment of vacations, days off, and holidays will be respected.
 - Overtime will not be mandatory and must be accompanied by additional compensation as required by local law.
- Compliance with labor and employment obligations:
 - Business Partners must comply with all obligations indicated in the labor and employment regulations of each country, such as tax withholdings, social security registration, and payment of contributions, etc.
 - If these obligations are not met and this causes harm to MHP or Bahia Principe, appropriate legal action will be taken.
- Workers' housing:
 - Where housing is provided for workers, it must comply with all local health and safety standards.
 - Housing must be clean, safe, and meet the basic needs of workers, including access to clean sanitary facilities and drinking water.

If a situation of abuse or exploitation is detected, MHP and Bahia Principe will cooperate with authorities and specialized organizations to eradicate it.

Code of Ethics and Conduct for Business Partners and Suppliers

2.3. Health and safety

- Business Partners are expected to maintain a high level of safety and well-being for their employees, clients, and the public.
- They are responsible for maintaining a safe and healthy work environment and ensuring the health and safety of people and communities that may be affected by their products or services.
- They must comply with all laws, regulations, and standards governing occupational health and safety in the jurisdiction where they operate.
- They must assign responsibility for health and safety to a management representative.
- They must implement procedures and systems to manage, investigate, and report occupational injuries and illnesses, including provisions to encourage reporting by workers; classify and record cases of injuries and illnesses; provide necessary medical treatment; investigate cases and implement corrective measures to eliminate their causes; and facilitate the reintegration of workers into work.
- Employees must receive safety training, including, where appropriate, the proper use of work equipment, chemicals, and personal protective equipment.

2.5. Business ethics, zero tolerance for corrupt practices

- Prohibition of corruption, extortion, or embezzlement
 - The highest standards of integrity are expected in all business interactions.
 - All forms of corruption, extortion, and embezzlement are strictly prohibited and may result in the immediate termination of the business relationship and any corresponding legal action.
- Disclosure and privacy of information
 - Means will be implemented to effectively safeguard customer information and intellectual property regarding business activities, financial situation, performance, and/or any other information considered confidential.
 - Such information will only be disclosed in accordance with the guidelines specified in any agreed non-disclosure agreement, privacy policy, and as provided by law.
- No undue advantage
 - Bribes or other means to obtain an undue or inappropriate advantage must not be offered to or accepted from anyone.
 - No partner, supplier, representative, or employee of the foregoing will offer any MHP or Bahia Principe employee a gift or bribe.
 - Business Partners must observe local customs regarding gifts; in any case, the value of such offers should never be significant enough to influence business decisions or contravene applicable regulations.
- Record keeping
 - Financial records will be maintained in accordance with all applicable accounting practices and will comply with all relevant legal and regulatory requirements.

2.6. Environment

- Business Partners must comply with all applicable environmental regulations and permits, including those addressing pollution controls, greenhouse gas emissions, product content restrictions, and responsible handling of hazardous materials and waste.

Code of Ethics and Conduct for Business Partners and Suppliers

- They must strive to minimize the environmental impact of their operations, products, and services.
- A Business Partner making sustainability claims regarding its products, services, or packaging, such as “environmentally friendly,” “sustainable,” “natural,” “green,” “compostable,” “biodegradable,” “recyclable,” etc., must provide adequate justification for such claims.
- Wildlife
 - We support the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and strictly prohibits any form of trade or promotion of illegal wildlife products that is contrary to CITES or any other local, regional, national, or international law and regulation.
 - The purchase or use of seafood from known illegal, unreported, and unregulated (IUU) sources is also prohibited.

2.7. Animal welfare

- Compliance with all applicable laws and regulations regarding animal welfare is required. Any form of mistreatment, exploitation, or use of animals in conditions contrary to current regulations is prohibited.

2.8. Fair competition

- We respect and promote free, fair, and honest competition.
- Business Partners are expected to refrain from any act that may be considered anti-competitive and that may cause undue harm to any market operator.
- Anti-competitive acts include price or condition agreements with other operators in the tourism sector, abuse of dominant market position, or appropriation of competitors’ trade secrets, among others.

2.9. Supply chain due diligence

- Business Partners are expected to monitor and resolve environmental and human rights issues throughout the supply chain, complying with applicable due diligence laws.
- Recommended procedures:
 - Periodic audits of subcontractors and suppliers.
 - Implementation of management systems and transparency in the supply chain.

2.10. Community engagement

- We encourage our Business Partners to actively participate in social and environmental initiatives that benefit the local community, such as donations, volunteering, and hiring young people in vulnerable situations.

4. Ethics channel

We have an Ethics Channel to report possible violations, queries, or complaints, guaranteeing confidentiality, impartiality, and absence of retaliation.

Communication channels include:

- Written communications:
 - a) Email: canaldenuncias@bahia-principe.com
 - b) Ethics Channel accessible through the Bahia Principe website www.bahia-principe.com
 - c) Postal address:

Code of Ethics and Conduct for Business Partners and Suppliers

Compliance Office, Avda. Gabriel Roca 33, 5th Floor, 07014, Palma de Mallorca, Balearic Islands, Spain.

- Verbal communications:
 - a) In-person meeting with the Compliance Office, or one of its members, within seven (7) days from the request for the meeting by the informant.
 - b) Verbal communication from a member of the organization to their hierarchical superior, the Human Resources department, or the head of another department, who must in turn transmit the information to the Compliance Office.

5. Consequences of non-compliance

- Failure to comply with the provisions of this Code may result in the application of appropriate measures, considering factors such as the type of relationship with MHP and/or Bahia Principe or the seriousness of the matter. These measures may include termination of the business relationship and the application of legal actions.
- Measures adopted from a legal perspective will always comply with applicable regulations, without losing forcefulness or proportionality with the seriousness of the facts.

6. Dissemination and updates

- We are committed to disseminating this Code so that it is known by all. This document is available on corporate website and is updated periodically to adapt to new legal and social requirements.

Approved by the Board of Directors on March 12, 2026