



Doing what's right

Code of Ethics and Conduct

Letter from the Chief Executive Officer of Management Hotelero Piñero



At MHP we are proud to be part of two great business families with high ethical standards that prompt us to be committed to the development of a culture based on ethics and responsibility. That is why we care about and take care of all our stakeholders (team members, guests, clients, owners, shareholders and local communities in which we operate) with honesty and integrity.

This commitment, which pervades our individual behaviors, drives everything we do—including the way we work and the way we relate to each other. It guides us in caring for those who work with us, in supporting our communities and preserving the planet. It also guides us in protecting information and assets, demonstrating integrity in our business dealings, communicating with honesty and transparency, and acting with professional responsibility.

In order to guarantee and promote that all of us who are part of Bahia Principe Hotels & Resorts act in an ethical and responsible manner, we have this Code of Ethics and Conduct, which is a key document for us, as it reflects our commitments and serves as a framework for making business decisions in an ethical and responsible manner.

We want to share this Code of Ethics and Conduct with all our stakeholders to continue building together an *Organization* of which we can all be proud and to convey our commitment to always do the right thing.

Thank you for your interest in learning more about how we are and how we conduct ourselves.

Julio Pérez

Chief Executive Officer of MHP

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1

Introduction

- Our goal is to do what's right
- Scope of application: everyone and in any situation

Our goal is to do what's right

MHP's aim is to take care of people so that they can be their best.

This Code of Ethics and Conduct represents our commitment to reach our full potential, both individually and organizationally, by acting with integrity and complying with the laws and regulations in force in each place where we operate. At MHP, we expect everyone to follow these principles, regardless of their role or position within the company.

All of us who are part of MHP and the other companies that operate under the Bahia Principe brand must be aware that, in the performance of our duties, compromising situations may arise that may affect both the company and us as professionals. This is why this document is the guide that will allow us to make the right decisions.

Throughout this Code we will be mentioning other MHP policies that you can refer to for more information. Bear in mind that the links to these policies are only available to members of MHP and the rest of the companies that operate under the Bahia Principe brand.

We encourage you to read the Code to understand what is expected of you and to refer to it whenever you have questions, in addition to other company policies. At the end of the document, you will also find the Ethical Decision-Making Guide, which can help you in complex situations.



Scope of application: everyone and in any situation

All members of MHP and the rest of the companies that operate under the Bahia Principe brand (the *Organization*) must comply with the provisions of our Code, including all team members, leaders, control bodies, managers, senior management and governing bodies.

Its scope also extends to customers, suppliers, consultants and other persons or entities that maintain a professional or commercial relationship with the *Organization* (referred to as “Business Partners”), regardless of the geographical area in which such relationship takes place. We strive to collaborate with external agents, suppliers, vendors and business partners who share our values and ethical principles.



Since we operate on a global scale, we must comply with various local regulations and policies. While this Code should serve as a guide, decision making should also be aligned with the applicable laws in each jurisdiction. If you are in doubt about a specific rule, consult your manager or the MHP Compliance Committee.

Any exemption from a provision of this Code for a member of the MHP Management Committee, an officer or any other employee may only be authorized by the MHP Board of Directors or the Audit Committee.

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How we care for our people, our communities and our planet

- Mutual respect
- Equal opportunity, diversity, equity and inclusion
- Safe workplaces
- Human Rights
- Community participation and volunteering
- Commitment to sustainability

How we care for our people, our communities and our planet

We are part of an environment that must be cared for and respected in all areas:

Mutual respect



In our work, we can all help to foster a culture based on respect and dignity. Respect is one of the values of both Grupo Piñero and Hyatt and is therefore fundamental to our company. It involves welcoming and valuing everyone we interact with, including team members, local communities, business partners and guests. It also means creating an environment in which everyone can express themselves freely, without fear of harassment or intimidation.

For us, **respect** means:

- Treating others as we would like to be treated, being able to put ourselves in their shoes and to empathize with them.
- Actively listening to anyone in any situation.
- Identifying and stopping any disrespectful behavior we encounter.
- Always using good manners and treating others without prejudice or labels.
- Not insulting, intimidating or harassing anyone.
- Avoiding unwanted physical contact and advances of a sexual nature.
- Not engaging in conversations with jokes, insinuations or derogatory comments of sexual content, sexual identity, physical appearance, different abilities, race or religious beliefs.
- Bearing in mind that respect must be present in all our interactions, whether in person, on the phone or in digital communications.

For further information, please refer to the [Dignity, Respect and Workplace Harassment Prevention Policy](#)

Equal opportunity, diversity, equity and inclusion

We are a global organization that is present in different parts of the world, with a strong commitment to fostering an inclusive and equitable diverse work environment and society everywhere we operate. We aim to create spaces where each person feels that they are valued and part of the community. For this reason, we work actively to ensure that diversity, equity and inclusion are reflected in our daily actions, in the way we act, in our policies, in our organizational culture processes and in the context in which we carry out our activities.

Therefore:

- We treat all people with kindness and professionalism, regardless of their appearance, gender, origin, sexual identity, religion, or any other characteristic that may make them different from us.
- We ensure equal opportunities in all Human Resources processes by treating people who work or want to work with us in an equitable manner.
- We recognize that the different perspectives, experiences and background of our employees are positive and benefit all of us. Diversity is a source of permanent and decisive enrichment for us. It is something valuable that allows us to confront different points of view and fosters greater creativity and innovation.

For further information, please refer to the [Equal Opportunity, Diversity, Equity and Inclusion Policy](#)



Safe workplaces



Fostering a safe and healthy work environment is an essential pillar of our commitment to the care and well-being of all. We strive to maintain a space free of risks, violent behavior or situations that may endanger people.

We must all work to ensure a safe and healthy work environment.

To do so:

- Abide by the rules: safety starts with you.
- Keep in mind that if you commit an unsafe act, you may endanger yourself and everyone around you.
- Causing an accident, even unintentionally, can have serious legal implications, both for you and for the company.
- Report any violent acts or threats you witness or experience. Failure to report can lead to a serious situation, and it is up to you to avoid it.

For further information, please refer to the [Occupational Health, Safety and Welfare Policy](#)

Human Rights



We are deeply committed to protecting and respecting the fundamental human rights of all people. We value and defend the rights of our team members, guests and local communities, and we extend the same respect and protection to our business partners, who are also expected to share and promote these principles.

- Use your knowledge and common sense to identify possible signs of human trafficking or exploitation of labor. If you notice anything suspicious, report it immediately to your superior.
- If you are in a position of responsibility, make sure that your team members are treated fairly and that their rights in terms of salary and time off are respected.
- Respect the right of each person to decide whether to be represented by a trade union organization, always in compliance with local legislation.

For further information, please refer to the [Human Rights Policy](#), the [Freedom of Association and Social Dialogue Policy](#), and [Policy Against Labor Exploitation, Abuse and Human Trafficking](#)

Community participation and volunteering

We aspire to make the communities where we operate dynamic spaces full of opportunities, where people can grow and thrive. We maintain a close relationship with our surroundings and seek to use the potential of our activity to contribute to the well-being and development of these places, making them better spaces to live, work and visit.

We want you all to be part of our initiatives and encourage you to share your ideas to generate a positive impact on our community.

Commitment to sustainability

Sustainability is part of our culture. We want to be a benchmark in sustainable development in order to create economic, social and environmental value for all stakeholders and generate the biggest positive impact on people and the planet.

Our commitment to sustainability is global and rests on three main pillars based on environmental, social and governance criteria.

To this end, our standards:

- Take into account energy efficiency, decarbonization, water conservation and the environment.
- Apply waste management strategies that prioritize waste reduction and incorporate circular economy principles wherever possible.
- Encourage responsible purchasing of products and services, taking into account key impacts such as climate change, deforestation, human rights, public health, biodiversity, animal welfare and resource scarcity, always promoting the development of local communities.
- Integrate sustainable practices, respect the legislations of the different countries with which we collaborate, and promote a responsible and conscious tourism model.

For further information, please refer to the [Sustainability Policy](#)



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How we protect information and assets

- Data privacy and security
- Confidential information
- Protection and proper use of assets

How we protect information and assets

We are committed to protecting the information and assets of the company and of our guests, employees and business partners.

Each of us plays a key role in the security and responsible management of the company's information and resources.

Data privacy and security

We are firmly committed to protecting the data of our guests and people who work with us. Therefore, we implement best practices in information security and train our team to ensure the responsible and secure use of data.

We invest in technology and in strengthening our data protection processes, which allows us to manage and minimize the risks associated with cybersecurity and privacy, ensuring the confidentiality and integrity of information.



Confidential information

Our work may give us access to confidential information about employees, customers, business partners or the company itself.

Confidential information is any non-public data or document or knowledge whose disclosure, misuse or unauthorized access could cause economic, commercial, competitive or reputational damage to the company or to the persons involved.

This type of information may only be accessible to authorized persons and only for the purpose of performing their job functions. Complying with this rule ensures that we protect our company and those around us.

Recommendations for protecting confidential information:

- Protect confidential information related to the company, employees, guests and business partners.
- Avoid talking about sensitive or strategic business issues in public places, especially if it involves confidential information or trade secrets of the *Organization*.
- Identify what type of information can be considered intellectual property and know the necessary measures to protect it.
- Do not take or share photographs of team members or guests without proper authorization.
- Never leave confidential documents or information in plain view or unattended, whether on your desk, on a printer or on an unlocked screen.
- Comply with all computer security standards. Use strong passwords on all company systems and devices, be alert to suspicious emails or emails from unknown senders, and do not open attachments or click on links if you are unsure of their origin.
- Abide by all confidentiality policies, whether you work from an office or remotely.
- Before participating in external interviews or conferences, review the public communication guidelines.

Confidential information

Personal information

In our day-to-day activities, we also collect and store personal data. Respecting and caring for our guests and teams members means always treating this personal information with responsibility, confidentiality and sensitivity.

We must comply with personal data protection regulations and ensure that we only have access to personal data if we are authorized to do so and if it is justified for our work.

Good practices in the processing of personal information:

- Access only the data you need for your work.
- Only use personal information for the specific purpose for which it was collected.
- Keep the information only as long as necessary and make sure it is securely deleted when it is no longer needed.

Protecting personal data reinforces the trust of our team members, business partners and guests.



Protection and proper use of assets

As part of the MHP team and the rest of the companies that operate under the Bahia Principe brand, we have the responsibility to care for and make proper use of the company's assets. These assets include physical resources (such as telephones or office supplies) as well as corporate funds and our working time. Being responsible implies using these resources judiciously and ethically.

Keep in mind that taking care of our company and its assets also means preventing fraud and avoiding any misuse. Fraudulent actions can damage our brand, harm our reputation and even affect our morale.

- Use company assets and resources only for professional purposes and in a responsible manner.
- Extend courtesies, amenities or discounts according to our policies and procedures, never for personal benefit.
- Be cautious when using computer equipment and networks, whether you work in an office, a hotel or from home. Do not access them with credentials other than your own or use them for personal purposes.
- Submit your expense reports clearly, accurately and on time.

Any conduct that also involves personal gain may be considered fraud. Here are some examples of fraudulent conduct:

- Using corporate credit cards or company accounts for personal expenses.
- Claiming reimbursement for non-job-related expenses.
- Applying unauthorized discounts for personal purposes.

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How we demonstrate integrity in our business dealings

- Gifts and invitations
- Bribes and kickbacks
- Competition and fair dealing

Gifts and invitations

We believe that gifts and invitations, when offered appropriately, can be a positive tool in strengthening business ties. However, we must always act judiciously and make sure these gestures do not affect our objectivity or generate the appearance of preferential treatment.

- Give and receive gifts only if their value is reasonable and they are offered on a one-off or occasional basis.
- Never give or accept gifts or invitations that may influence business decisions.
- Record all gifts and invitations you make in your expense report, in accordance with company policy.

For further information, please refer to the [Gifts, Invitations and Hospitality Policy](#)



Bribes and kickbacks

We strictly comply with laws that forbid bribery. We do not give or accept favors, money or any type of advantage in order to obtain commercial benefits. Given that *the Organization* may be deemed liable for any illegal acts committed by third parties on our behalf, we act diligently when it comes to outsourcing to such third parties and overseeing them.

- Never use or offer the *Organization's* funds, assets, services or facilities to unduly influence a business decision.
- Do not offer to work beyond the current scope of your duties in the hope of garnering additional business.
- If you work with third parties, make sure they are familiar with the *Organization's* rules against bribery and monitor their actions closely.
- Record all payments and transactions truthfully and accurately, and do not try to conceal the real purpose of an expense item.
- You are not allowed to accept any type of compensation for referring third parties to have business dealings with us.

Competition and fair dealing

We compete ethically, providing the best experience for our guests. We comply with antitrust laws that protect consumers and guarantee a free and fair market.

- Never establish agreements with competitors (whether in person, in writing, formally or informally) that may restrict competition.
- Treat all suppliers who work or want to work with us fairly.
- Do not misrepresent the facts when negotiating on behalf of *the Organization*.



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How we communicate transparently and responsibly

- Responsible communication
- Accurate and transparent financial records and reporting

Responsible communication

Honest and direct communication allows our employees, guests, owners and shareholders to trust us. To ensure that this happens, only certain people are authorized to speak on behalf of the *Organization*.

- Do not speak on behalf of the company unless you have express authorization. This includes sharing information online or on social media.
- Comply with MHP communication guidelines before accepting an external interview or speaking engagement.
- Consult with your Manager or the Communications Manager if you receive an inquiry from the media or any external person about the company.
- Use social media responsibly. Be professional, avoid offensive language, think before you post something negative and never indicate that you are speaking on behalf of the company unless it is part of your job responsibilities.
- Never share confidential information about the *Organization*, our guests or business partners on social media.



Accurate and transparent financial records and reporting

We keep our financial statements accurate and free of omissions and have internal controls in place that are designed to ensure accurate and reliable financial reporting.

Our records accurately represent our intentions, actions and decisions, and we keep them in accordance with company policies and applicable laws. They are the basis for our income statements, financial reports, public filings and other disclosures to third parties. They also guide our decision making and strategic planning.

To fulfill this commitment:

- Record assets, liabilities, income and expenses accurately and honestly, complying with all corporate policies and internal control procedures.
- Be responsible when creating or approving expense reports. Do not include personal expenses as business expenses or approve reports without checking them carefully.
- Keep records in accordance with the company's document retention policy.
- Follow the instructions of the Legal Department if you are required to keep certain records in connection with an investigation or legal proceeding.

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How we act as responsible professionals

- Conflicts of interest and business opportunities
- Insider trading
- Political participation
- Prevention of money laundering

Conflicts of interest and business opportunities

We are committed to preventing conflicts of interest and any situation that could give the appearance of a conflict of interest. This implies that we do not seek personal benefits that may conflict with the interests of the company or that may influence our objectivity in performing our duties. If at any time you have doubts about a possible conflict of interest, the most important thing is to report it immediately to the Compliance Committee.

- Identify and avoid situations and relationships that may generate conflicts of interest.
- Do not solicit or accept personal benefits (or allow family members or close friends to receive them) as a result of your position in the company, unless expressly permitted by Human Resources policies.
- Do not take advantage, for your own benefit, of any business opportunity that arises as a result of your role in the company.
- If you detect any actual or potential situation that may represent a conflict of interest, report it immediately.

We never take advantage, for personal benefit, of the opportunities that may arise from our work in the company, because we are all part of the same team. This means that we do not use company resources or information for personal gain or to compete with the company.



Insider trading

Insider trading occurs when someone who has material non-public information about a company buys or sells securities of that company and benefits from the information, he or she has that the market does not know. This practice is unfair and illegal.

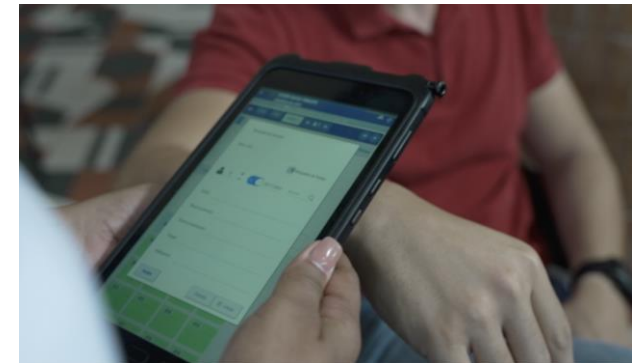
At MHP and Bahia Principe we comply with all laws related to insider trading.

We do not trade in the shares or securities of affiliated companies or provide trading advice based on material non-public information. Violation of the law can result in severe penalties for both the individuals involved and the company.

Key rules:

- Do not use material non-public information for personal gain and protect it at all times.
- Never “tip” someone to make transactions based on material non-public information.
- If you have any doubts about the legality of a transaction, contact the Legal Department.

Our *Organization* has established specific policies and procedures for employees who deal in securities of the Company or of entities with which we do or may do business. If you participate in these types of transactions, you must comply with these policies.



Political participation

We respect the right of our team members to participate in political activities, but this participation must be kept separate from the company's business and image.

- Do not participate in political forums or demonstrations representing the company. This also applies to social networks related to the work environment in which our position in the company appears.
- Do not use company funds, facilities or other company assets to support political candidates, parties, organizations or causes without express authorization.
- Do not solicit political support or contributions while on the job.
- If you engage in political activities on your personal time, make it clear that your opinions are your own and do not represent the company.

Prevention of money laundering

We are committed to compliance with anti-money laundering, anti-corruption and anti-terrorist financing laws and regulations. We do not accept payments that may be related to illegal activities.

Money laundering is the criminal practice of concealing the origin of illegal funds, and some criminals attempt to use legitimate businesses to facilitate this type of activity.

Carefully review all payments and transactions with customers, suppliers, business partners, agents and affiliates and pay attention to red flags such as:

- Transactions involving large amounts of cash or foreign bank accounts.
- Suppliers who try to avoid written contracts.
- Requests for payment to names or entities other than those agreed upon.

If anything seems suspicious, report it immediately to the Compliance Committee.

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Commitment to the Organization

Commitment to the Organization

Caring for others and for our *Organization* means having the courage to voice any concerns related to unethical behavior. It also means fostering an environment where our colleagues can speak freely and without fear when something makes them uncomfortable.

All members of our *Organization* must comply with the provisions of this Code, and if you also hold a position of responsibility, you must:

- Lead the team by example, always acting with integrity and in accordance with the values and commitments established in this Code.
- Ensure that your team knows and understands the contents of the Code of Ethics and Conduct and has the necessary resources to act in accordance with the established commitments.
- Develop your team, establishing clear, measurable and achievable objectives oriented to promote ethical behavior and maximum quality in providing customer service.
- Ensure compliance with the standards established in this Code within the *Organization*, in a fair and consistent manner.



Commitment to the Organization

So that we can all voice our concerns or ask questions when we believe that someone is not complying with the provisions of this Code, the company makes available to us:

Compliance Committee

At MHP we have an internal body with independent powers of initiative and control, which is entrusted, among other duties, with the responsibility of supervising the operation and observance of the MHP Compliance Model.

In this respect, the Compliance Committee is responsible for overseeing the application of the values and commitments that govern the activities of MHP and Bahia Principe, mainly those contained in this Code of Ethics.

Ethics Channel

MHP has an Ethics Channel through which members of the *Organization*, business partners and/or third parties can report possible breaches of current legislation or internal regulations of the *Organization*, as well as make inquiries regarding their scope.

In this regard, the Ethics Channel is governed by the principles of trust, confidentiality, impartiality, prohibition of retaliation, objectivity, subsidiarity and proportionality.

MHP offers the following means of communication:

- Written communications:
 - a) Email: canaldenuncias@bahia-principe.com
 - b) Ethics Channel available on the Bahia Principe website www.bahia-principe.com
 - c) Postal address: Órgano de Cumplimiento. Avda. Gabriel Roca 33 Planta 5, 07014, Palma de Mallorca, Balearic Islands, Spain.
- Verbal communications:
 - a) Face-to-face meeting with the Compliance Committee, or any of its members, within seven (7) days of the request.
 - b) Verbal communication from a member of the *Organization* to their hierarchical superior, to the Human Resources department or to the person in charge of another department

You can raise your concerns with these bodies.



What can you expect when filing a report?

- You can expect to be treated fairly

In accordance with our General Ethics Channel Policy, any retaliation against those who raise concerns in good faith is prohibited. We take this very seriously.

- You can expect MHP to take action

The Compliance Committee will review the situation and determine whether it is necessary to open an investigation. If so, it will be conducted in a fair and objective manner, based on the information provided.

- You can expect us to count on your cooperation

If the *Organization* needs to investigate possible misconduct, your cooperation is essential to ensure a thorough and efficient investigation. We count on you to be patient, considerate and honest.

- You can expect to be treated with respect

We appreciate any report made in good faith, as it helps us to improve. MHP will keep your report as confidential as possible and will follow up with you to the extent possible.

For further information, please refer to the [Ethics Channel General Policy](#) and the [Ethics Channel Regulations](#)

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Disciplinary procedures

Disciplinary procedures

All members of the *Organization*, regardless of their hierarchical level, geographical location or function, are obliged to comply with the contents of this Code of Ethics, as well as to report any breach thereof.

Failure to comply with the provisions of this Code and other internal MHP policies may result in actions that may be applicable to both labor and business, as appropriate based on criteria such as the type of relationship between the *Organization* and the person who commits the violation or the seriousness of the event.

Measures adopted from a legal perspective will always abide by the applicable regulations and will be applied with the appropriate forcefulness and proportionality, informing the workers' legal representatives as appropriate



Guide to ethical decision making

- Use common sense
- Do the right thing

Here we show you how you can comply with and enforce our Code of Ethics and Conduct:

Use common sense

On many occasions we know what is right and what is wrong, without needing anyone to tell us. Use common sense to know if a behavior or situation does not comply with the provisions of this Code.



In caring for our people, our communities and our planet

Mutual respect, equal opportunity, diversity and inclusion: **Practice empathy**

Show empathy with those around you. Keep in mind that something you find funny may be hurtful or offensive to someone else. Take a moment to reflect on how others might interpret what you are about to say.

- Caring for others means speaking up if someone is being disrespectful.
- Address the person directly if you feel comfortable doing so or talk to your manager or supervisor.
- Remember that the law punishes harassment and discrimination, and that certain behaviors can be considered a hate crime that can have criminal consequences.

Use common sense

In caring for our people, our communities and our planet

Commitment to sustainability: **Take care of your planet, your home**

Apply your commitment to sustainability as part of your daily routines.

- Turn off lights and work equipment when not in use. Energy is not infinite.
- Reduce the use of paper: print only when necessary.
- Sort and recycle waste correctly.
- Reuse materials whenever possible.
- Save water—every drop counts!
- Do not waste company resources.



Safe workplaces: **Take care of those around you as well as yourself**

- Pay attention to unsafe conditions that could harm you, a co-worker, guest or supplier.
- If you see something wrong, try to correct it. If you are unable or if it is unsafe to do so, report it immediately.
- Comply with all environmental management procedures. Take care of your planet, think about the future

Use common sense

Protecting information and assets

Confidential information: **If you are unsure whether certain information is confidential, proceed with caution**

If you have any doubts about whether you can share certain information, the most cautious thing to do is to consult with your direct superior or the Data Protection Officer before making any decision. Confidential data include:

- Personal data of employees, customers, officers and any natural person for whom the company holds data. They are also protected by the Data Protection Act and the right to confidentiality (or right to privacy).
- Employment contracts and salary conditions. Employee performance data.
- Agreements and negotiations between the company and its customers or partners, as well as with its suppliers or government agencies. This confidentiality is usually protected through a confidentiality agreement or contract.
- Know-how, patents and projects under development.
- Standards, guidelines and data from any area of the company, including commercial, financial, branding-related, etc.
- Operating manuals and procedures. Management systems, processes and databases.

Protection and proper use of assets: **Use of time and resources**

When we talk about using company assets for work purposes only, we mean it. However, we understand that there can be limited personal use, as long as it is reasonable. This use of resources does not only affect the company's tools; it also affects the effective working time.

Use common sense; for example, making a brief call for an urgent matter or a specific query from your PC may be allowed. But this use should be occasional and never interfere with your professional responsibilities, no matter where you work from. Above all, keep in mind that the company reserves the right to access the IT tools it provides and control their use, always guaranteeing your right to privacy.

Use common sense

Protecting information and assets

Technology and IT resources: **Use computer tools responsibly, every click counts**

Our technological resources and communication systems are fundamental to the operation of our business. It is important that we do everything we can to protect them.

- Be alert to phishing attempts or other forms of unauthorized access to our systems and data.
- Never send inappropriate information through our systems or use them for illegal purposes.
- Use our systems properly and for professional purposes.
- Follow the computer security guidelines established by the company.
- Never transfer personal information or confidential *Organization* data outside the company's systems.

Company information: **Protect our information.**

Protecting the company's information also means preserving the intellectual property that makes our *Organization* the company we are today.

Each of us has a responsibility to protect both intellectual property and the systems we use every day.

This means, for example, that we must:

- Use our trademarks, logos and trade names correctly, always following corporate guidelines.
- Manage technology and information systems in a secure manner and in accordance with established policies to prevent unauthorized access or improper use.

Use common sense

Showing integrity in all your actions/business dealings

Gifts and hospitality: **Look out for red flags**

There are certain types of gifts and hospitality that are usually not appropriate and always require prior approval:

- Expensive gifts, like a bottle of high-value wine.
- Lavish hospitality, such as tickets to exclusive events (World Cup, Olympic Games, etc.).
- Inappropriate activities or entertainment that may damage the image of MHP and Bahia Principe.

When can a tip be accepted?

There are functions where cash tips are appropriate. For example, it is acceptable for a bellhop to receive a tip for good service, but it is not acceptable for someone on the events team to receive a tip from a vendor who expects to influence our business decisions.

Bribes and illegal kickbacks: **Do not bribe**

Bribery is unethical, no matter to whom it is directed: suppliers, employees, customers, public officials or anyone else. This includes any compensation for providing referrals or recommendations from third parties.

Competition and fair dealing: **Be careful with certain deals**

Making arrangements with competitors that may restrict competition is a serious violation of the law. Among other things, it is illegal to split up markets, fix prices, limit production, or boycott individuals or entities.

Use common sense

Communicating transparently and responsibly

Responsible communication: **Use common sense on social media**

Use common sense when posting on social media. It is best if your messages are positive and productive. Remember that your comments should never make anyone feel uncomfortable, intimidated or threatened.

When using professional social networks, be true to the real position you occupy in the *Organization*. Using a position that is not yours can lead to confusion and generate conflicts.

Accurate and transparent financial records and reporting: **Be rigorous**

Transparency and accuracy in record keeping help maintain trust in our company and protect our reputation. For this reason, it is essential to be careful and accurate when recording information that contributes to the company's records. For instance:

- Booking information
- Customer personal data
- Payroll information
- Employment records
- Travel and expense reports
- Email addresses
- Accounting and financial information
- Performance assessment and evaluation records
- Electronic files

Never allow someone to convince you to misrepresent facts or record something that does not seem right to you. Be alert if this happens around you. We must protect our company against fraud.

Use common sense

Acting as responsible professionals

Conflicts of interest and business opportunities: **Never take advantage, for your personal benefit, of opportunities that may arise from your work in the company**

There are certain situations that normally give rise to a conflict of interest. For example, you should never:

- Work for a competitor company while working for MHP or any of the companies operating under the Bahia Principe brand. Remember that this is also grounds for dismissal.
- Have significant financial interests in a competitor's company or in a supplier of the company.
- Hire relatives just because they are family or give them job opportunities that are not available to others.

There are other types of interests that may or may not give rise to a conflict but should still be disclosed. For example, it is necessary to disclose whether you are on the board of directors of a for-profit or not-for-profit company. At certain levels of responsibility, even the mere appearance of a conflict of interest can be a serious problem and affect trust within the company.



Use common sense

Acting as responsible professionals

How to identify a conflict of interest:

Situations involving a conflict of interest are not always obvious or easy to resolve. That is why we have the Compliance Committee, which will help you determine whether a situation generates a conflict or a potential conflict and mitigate the risk. This will allow you, in many cases, to continue with your personal interest without putting the company at risk.

Insider trading: **What is material non-public information?**

Material non-public information is any information that could influence the price of a company's securities and has not yet been disclosed to the public.

This type of information may relate to almost all aspects of the company's business and operations, including but not limited to:

- Strategic planning information.
- Undisclosed financial results or corporate earnings.
- Planned mergers or acquisitions.
- Changes in senior management.
- Development of new products or services.
- Negotiations or developments with outside owners, franchisees or partners in hospitality projects.

Do the right thing

Doing the right thing requires us to think carefully about our actions and decisions every day. If you are faced with a difficult decision, evaluate your options and seek guidance. Refer to Item 7 of this Code, “Commitment to the *Organization*”, for information on how to ask for help. You can also refer to the General Ethics Channel Policy and the Ethics Channel Rules and Regulations.

- It may be useful to ask yourself some questions to guide you in the decision-making process. For example:
- Is it consistent with the Code and our policies?
- Do I have all the material facts?
- Do I feel it is the right thing to do?
- Does it reflect the *Organization's* commitment to doing the right thing?
- Is it legal?
- Would I feel comfortable if it were made public in the media or reported to management?

If the answer to any of these questions is “no”, you should consult with the Compliance Committee or, if you prefer, your superior or the Human Resources department

We know that achieving excellence requires effort and dedication, and for this reason we are grateful:

- For your constant commitment to always do your job in compliance with the rules.
- For the care and responsibility, you show to others and to the *Organization* when you question what does not seem right and raise your voice when necessary.
- For your integrity.

Thank you for taking the time to connect and care for those around you, and for doing the right thing no matter how difficult it may be.

