

# Corporate Policies 2023

EQUALITY  
HEALTH AND SAFETY  
CORPORATE SOCIAL RESPONSIBILITY  
GOOD EMPLOYMENT PRACTICES  
ENVIRONMENTAL  
QUALITY  
TIME MANAGEMENT  
MOBILITY  
TRAINING  
LOCAL COMMUNITY SUPPORT  
HUMAN RIGHTS  
TAX EVASION  
ANTI BRIBERY AND CORRUPTION  
WHISTLEBLOWING  
ANTI MONEY LAUNDERING

# Index

ADH Hotels & Resorts aims to reflect in this sustainability report and corporate policies our commitment to integrate responsible business management in the economic, social and environmental spheres, while reinforcing our commitment to offer full corporate transparency to our stakeholders.

1. EQUALITY

2. HEALTH AND SAFETY

3. CORPORATE SOCIAL RESPONSIBILITY

4. GOOD EMPLOYMENT PRACTICES

5. ENVIRONMENTAL

6. QUALITY

7. TIME MANAGEMENT

8. MOBILITY

9. TRAINING

10. LOCAL COMMUNITY SUPPORT

11. HUMAN RIGHTS

12. TAX EVASION

13. ANTI BRIBERY AND CORRUPTION

14. WHISTLEBLOWING

15. ANTI MONEY LAUNDERING

# 1. Equality Policy

We're committed to ensuring **equal opportunities** in all of its areas, **eliminating discrimination and fostering diversity to drive innovation**, making our company a safe place for people.

To attain its objective of equal opportunity, ADH Hotels & Resorts makes available to our employees, notary our customers and partners, this Equality, Diversity and Inclusion Policy, with the aim of disseminating our commitment and positioning the company to attain gender equality and women's empowerment in keeping with United Nations Sustainable Development Goal (SDG) 5.



The following actions will be carried out in furtherance of these objectives:

Encouraging our employees to contribute their experiences, knowledge and skills infavour of inclusion and collaboration

Ensuring an objective selection and hiring process based on criteria that focus oncapacity, supporting collectives that face difficulties in entering the labour market

Making it clear that discrimination, abuse and harassment of any type will not betolerated, and taking disciplinary measures in response to any issues that arise

Making our employees responsible for acting in an inclusive manner, in accordance withour equality policies and objectives

Promoting our employees' participation under equal conditions, based on impartialcriteria, to facilitate their professional success

Employing inclusive language all types of corporate communication, both internal andexternal, and taking measures against the use of discriminatory language

Our senior staff are committed to supporting and promoting an environment ofinclusivity, diversity and equality, taking the measures required to bring this about.

## 2. Health and Safety Policy

Because our people are our principal asset and the most important element for us to attain our objectives, their safety is our priority.

Aware of the safety and health risks faced by our organisation, and mindful of Act 31/1995 of 8 November on preventing occupational risks, at ADH Hotels & Resorts we are committed to providing safe and healthy work conditions, notary to contributing to fulfilling United Nations Sustainable Development Goals (SDGs) 3 and 8.

In furtherance of these goals, we have established the following lines of action:

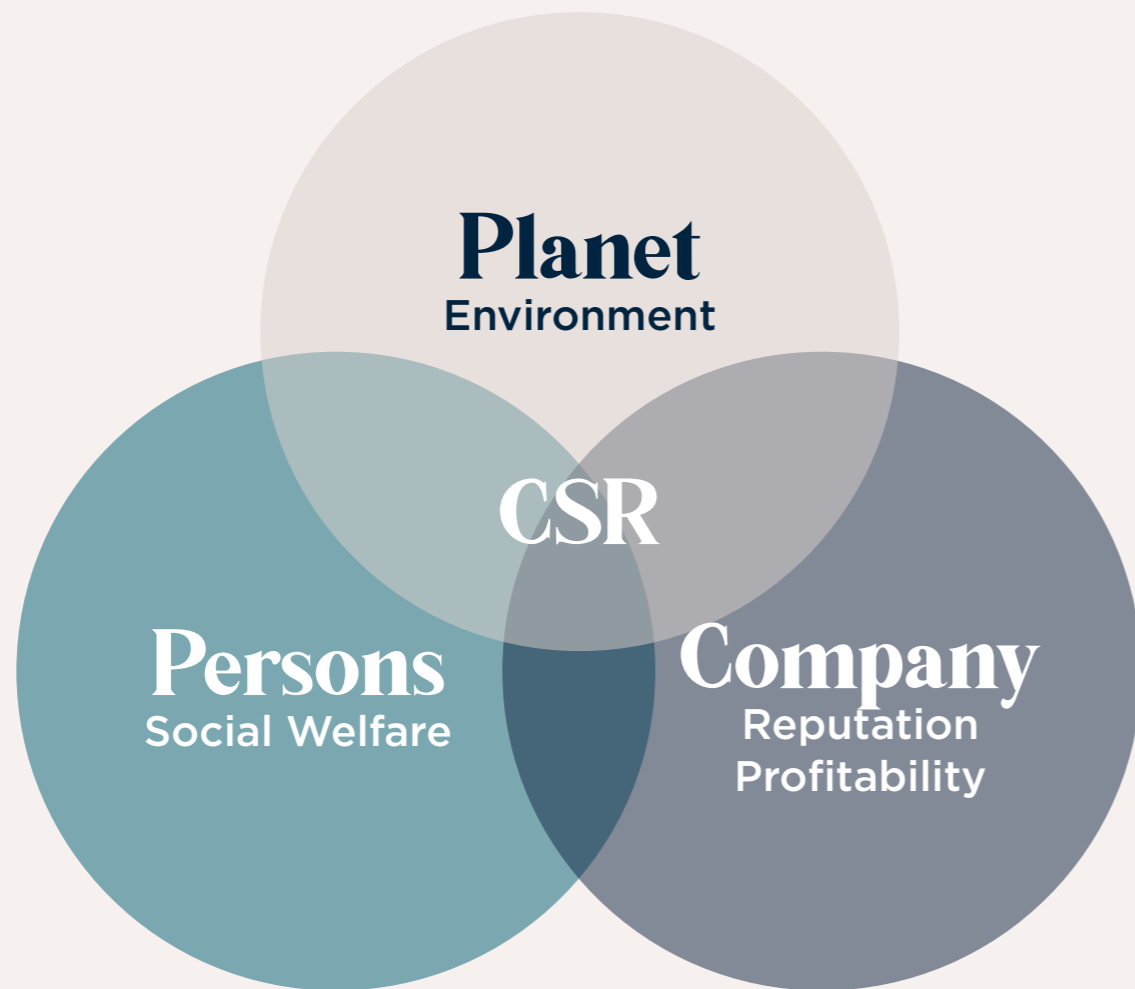


- Identifying the hazards and risks that may compromise our employees' ability to carryout their work, to assess and subsequently mitigate or eliminate such hazards and risks.
- Providing occupational safety and health training, to prevent risks and encourage healthy behaviour, in addition to first-aid training courses.
- Complying with and going beyond legal requirements on occupational risk prevention.
- Ensuring that our employees' safety and health take precedence over their work requirements.
- Providing the resources (economic, material and human) needed to prevent hazards and reduce occupational risks.
- Disseminating and applying our Health and Safety Policy among our staff to ensure that it is fulfilled.
- Offering our employees regular medical check-ups.
- Promoting information compilation and our employees' participation to bring about a safer and healthier work environment.
- Ensuring ongoing improvement of actions in favour of occupational risk prevention by frequently reviewing, analysing and updating information.
- Defining an organisational structure and clarifying each of our employees' responsibilities based on the principle of subsidiarity.

# 3. Corporate Social Responsibility Policy

With a view to **promoting and encouraging Corporate Social Responsibility** in our business activities and creating value in the corporate, social and governance spheres, ADH Hotels & Resorts is formalising its practices through this Corporate Social Responsibility Policy, which establishes our organisation's general framework and basic principles and that we are making available to our employees and to society at large.

At ADH Hotels & Resorts we understand social responsibility as a **requirement for the success of our tourist sector activity**, for which reason we prioritise **personal well-being** and the **sustainable development** of tourist destinations and of the communities where we operate.



To offer **quality service** while respecting the environment and generating wealth in society through our activities, services and products, ADH Hotels & Resorts is adopting the following principles:

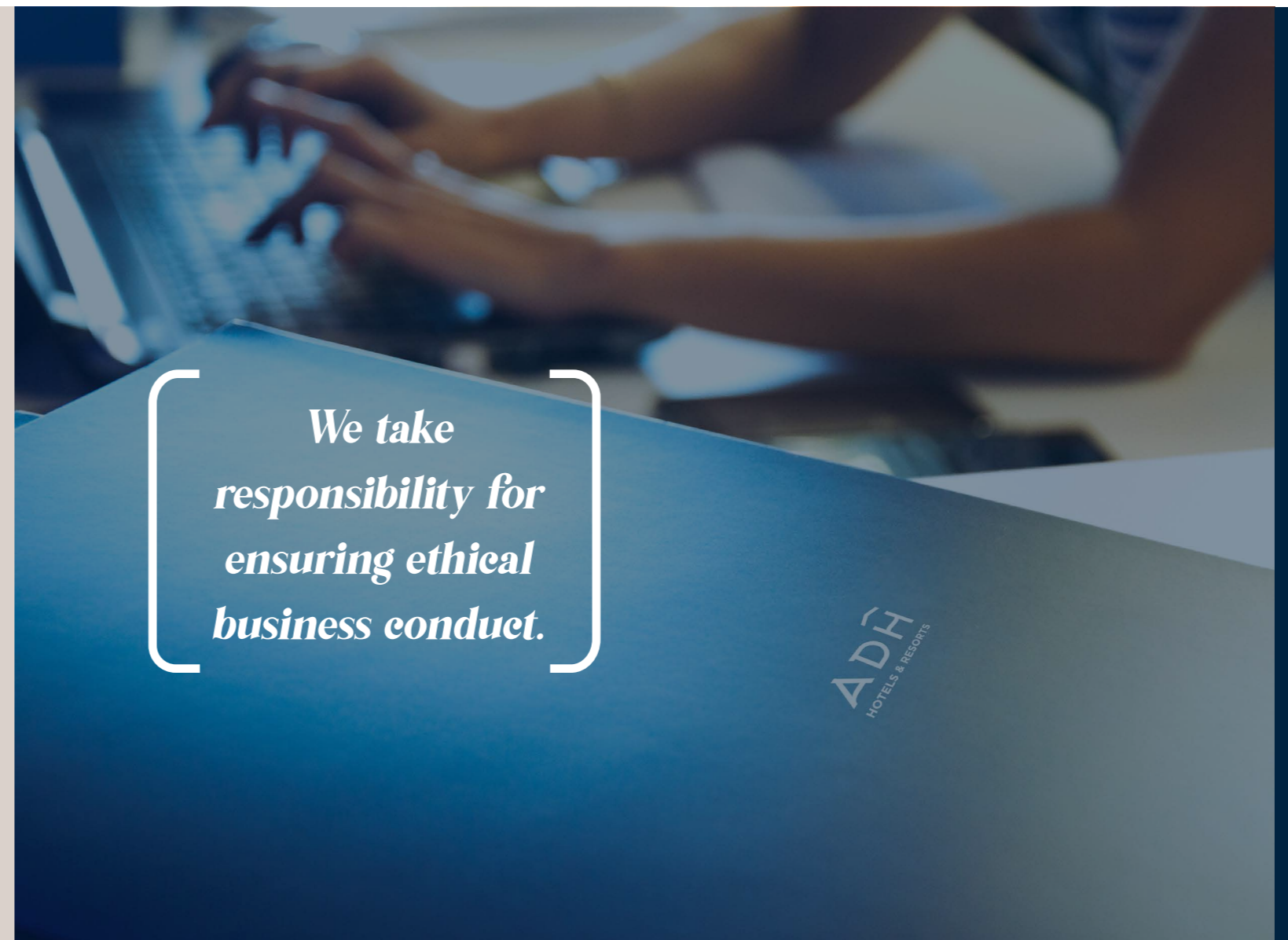
- 1. Favours the organisation's strategic objectives to provide a quality, environmentally friendly service**
- 2. In compliance with the law in the countries and destinations in which the organisation operates**
- 3. Aligning the foundations set out in the organisation's Mission, Vision and Values, notary its other Corporate Policies, with our daily practices.**
- 4. Publicly disseminating relevant, reliable information on the organisation's activities, so as to instil an attitude of transparency, thus generating confidence and credibility.**
- 5. Aligning the organisation's economic growth with sustainable development and efficient resource management.**
- 6. Providing environmental training to our employees, involving them in our environmental practices and objectives.**
- 7. Avoiding and penalising any type of discrimination, ensuring that human rights are respected at the organisation's facilities, notary in our business relationships and our relationships with the local community.**
- 8. Keeping the organisation at the cutting edge of service quality.**
- 9. Creating and fostering a healthy, safe work environment for our employees.**
- 10. Keeping lines of communication with our stakeholders open and operational, valuing their opinions and proposals.**

# 4. Good Employment Practices Policy

In accordance with **legal requirements** and **human rights principles**, notary our internal policies, ADH Hotels & Resorts, is formalising its practices in this Good Employment Practices Policy, which lays out our organisation's general action framework and basic principles, which are intended to guide our team's conduct. In addition, this policy is aligned with United Nations Sustainable Development Goals 5, 8 and 10.

Having good practices in this area is an obligation for the company, and constitutes an opportunity for it to demonstrate its transparency towards employees and customers; for this reason, ADH Hotels & Resorts guarantees that:

- 1** It complies, enforces and actively consults employment regulations, making needed changes when so required by law.
- 2** It promotes a workplace environment free of violence, harassment and abuse of any type.
- 3** It will oppose any type of discrimination, whether internal or external, that may arise in our business, informing or penalising the parties involved, as appropriate.
- 4** It will promote a dignified, respectful, equality-based and fair treatment in and outside of the company.
- 5** It establishes safe, healthy, decent and transparent work conditions, disseminating them among our employees.
- 6** Corporate activities are conducted on the basis of honesty, integrity, professionalism and transparency.
- 7** It will penalise any dishonest behaviour or activity within the organisation.
- 8** Encourages our team's personal development, providing ongoing training and promoting career development, and helping our employees to move up within the company.
- 9** It respects, protects and helps protect the organisation's interests and image, exercising its functions professionally, ethically and responsibly.
- 10** Carries out its activity minimising its environmental footprint.



*We take  
responsibility for  
ensuring ethical  
business conduct.*

ADH  
HOTELS & RESORTS

# 5. Environmental Policy

ADH Hotels & Resorts operates in the tourist sector according to criteria centred on customer satisfaction, sustainability and our commitment to the environment.

Our contribution to sustainability is formalised in this Environmental Policy, signed by our employees, in which we set forth that all of our activities, products and services are to be developed so as ensure our continual improvement, through our commitment to pollution prevention, biodiversity preservation and environmental conservation.

In accordance with our principles, our organisation is committed to:



- Complying with applicable legislation, notary with the commitments that the organisation has voluntarily agreed to.
- Reducing our environmental footprint by diminishing waste generation and promoting waste separation, cutting greenhouse gas emissions and minimising water and power consumption, notary promoting renewable energy use.
- Including environmental criteria in the analysis and assessment of processes that may have direct or indirect environmental impacts, notary in the development of our products and services.
- Developing our services, and ensuring proper environmental risk management, to minimise or eliminate that risk.
- Involving our vendors and subcontractors in our principles and management.
- Contributing to society, and fostering local culture and traditions, by contracting and working with local entities.
- Raise environmental awareness.
- Providing our staff with the resources they need to participate and make it possible for ADH Hotels & Resorts sustainability goals to be attained.

## 6. Quality Policy

ADH Hotels & Resorts, along with all of its employees, is committed to providing quality service for our customers to meet their expectations. These ideas are set forth in our Quality Policy, which covers lodging and dining services

ADH Hotels & Resorts has promoted this policy as regards all of its employees, to **encourage their participation in and contribution to our commitment to quality of service and the well-being of our partners**. Management reviews this policy annually to ensure that its content is in keeping with the strategy developed by our staff and with our partners' needs.

In furtherance of these goals, we have established the following lines of action:

- In compliance with the law, notary other requirements to which we have voluntarily agreed, in the countries and destinations in which the organisation operates.
- Integrating the quality management system into the organisation's strategy.
- Keeping lines of communication with our stakeholders open and operational, and valuing their opinions and proposals.
- Always seeking ongoing improvement in our services, regularly assessing and optimising our procedures.
- Being attentive to the service and relationship with partners and vendor control, to ensure the level of quality of the products we offer.
- Promoting a work environment that promotes personal development, encouraging our employees to take initiatives and participate, and providing them with the training and resources they need.
- Performing regular maintenance on, and reviews of our facilities to ensure partner security and comfort

*‘ We have a commitment to continually improve relative to our service quality and process efficiency goals ‘*





# 7. Time Management Policy

## *Collective bargaining agreement applicable to the organisation*

At Adh Hotels & Resorts we are governed by the collective bargaining agreement for offices of the Province of Madrid, Spain.

In addition, we signed a company agreement with employee representatives on 1 October 2019, improving some of the conditions set forth in the collective bargaining agreement, as detailed below:

- Flexible arrivals (between 8:00 am and 9:30 am) and departures (between 5:30 pm and 7:00 pm).
- Intensive ordinary working day in the summer months according to the agreement.
- Reconciliation of work and family life, allowing the possibility of teleworking.



## *Ordinary workday*

At Adh Hotels & Resorts, the ordinary working day is split and compressed in the summer months, according to the work calendar for the corresponding year established in the Collective Bargaining Agreement. It should be added that this working day respects the legal maximum of 1,826 hours and 27 minutes, discounting holidays, weekly breaks and public holidays.

As regards the type of workday, the company has a split working day, as established in the Collective Agreement. The maximum working week is 40 hours a week.

Normal workday	
M-T	Arrival: Between 8:00 - 9:30 am Departure: Between 5:30 - 7:00 pm 1 Hour meal break
F	Arrival: Between 8:00 - 9:30 am Departure: Between 2:30 - 4:00 pm
Compressed workday (summer)	
M-F	Arrival: Between 8:00-9:30 am Departure: Between 3:00 - 4:30 pm

## 8. Mobility Policy

Mobility is currently one of the main challenges to be overcome. Climate change is closely linked to transport, as are accessibility and non-discrimination. To achieve efficient, environmentally respectful and at the same time inclusive mobility, taking into account an organisation's capacity of action, a series of barriers must be overcome, requiring cooperation between the public and private sectors.

Within the framework of the Sustainable Development Goals (SDGs), Adh Hotels & Resorts prioritises environmental social responsibility as regards transport and accessibility. Our organisation is committed to promoting and facilitating sustainable, equitable and efficient mobility, thus contributing to fighting discrimination and meeting the climate challenge. Adh Hotels & Resorts reaffirms its commitment to the environment and assumes responsibility for any environmental impact caused by it.

In furtherance of these goals, and in accordance with our principles, we have established the following lines of action:

- Complying with applicable legislation, notary with the goals that the organisation has voluntarily agreed to
- Reducing our carbon footprint by minimising our use of fossil fuels for transport.
- Promoting a fair, efficient and environmentally respectful mobility model.
- Involving our vendors and subcontractors in our principles.
- Raising environmental awareness and ensuring our team's ongoing sustainability training.
- Providing our staff with the resources they need to become involved and contribute to achieving the proposed sustainable mobility and accessibility objectives.
- Performing regular maintenance on and assessment of our facilities to ensure user accessibility and comfort.
- Giving our customers, employees and the overall community preferential access to our facilities.
- Minimising our transport-related impact on the environment, prioritising the reduction of its greenhouse gas and noise emissions.

Consequently, Adh Hotels & Resorts has devised the following series of actions to be carried out:

- Encouraging employee car sharing.
- Periodically reviewing this policy, its objectives and the proposed actions and, where necessary, adapting them.
- Acquiring goods and services from local vendors.
- Promoting bicycle and electric scooter use.
- Partially covering the cost of public transport use by its employees.
- Promoting the use of electric vehicles by installing charging points and adapted parking areas.
- Striving, to the extent possible, to maintain facilities based on equality and that do not impede access by persons with different abilities.
- Setting realistic sustainable mobility goals.
- Informing both employees and customers of the measures, and encouraging their participation.
- Avoid as far as possible the use of air transport for journeys within the peninsula.

## 9. Training Policy

In keeping with our values, we view our employees as a strategic asset for the proper performance of our activity. Consequently, at Adh Hotels & Resorts we consider training one of the cornerstones for developing our business strategy.

Moreover, all of our personnel, from directors to core-operations employees, are involved in our training policy, in keeping with our desire to continue improving day in and day out and become a better company.

*“Training is a fundamental investment for developing our workforce, both to improve our market position and to allow our employees to acquire the knowledge they need to adapt to new technologies and trends in the sector”*

In accordance with these aspects, we commit ourselves to:

Maximising all of its employees' human capital.

Conducting individualised training programmes, bearing in mind each employee's specific needs, and always in keeping with our business strategy.

Playing a proactive role in training, for all of our members to acquire the skills they need to properly perform their work.

Regularly reviewing our employees' knowledge of the company's current needs.

# 10. Local Community Support Policy

ADH Hotels & Resorts, assumes responsibility for its business's possible impact on local communities and to the extent possible, will channel all of its efforts to reduce its environmental impact.



***We believe in our commitment to society.***

***That is why we contribute to the challenges and achievements of the places where we operate, ensuring sustainable consumption and production.***

In accordance with our principles, our organisation is committed to:

1. Acquiring goods and services from local vendors.
2. Integrating its work into the community and collaborating with its cultural institutions.
3. Reducing the negative impact of our activity on localities beyond what is required in regulations (noise, odours, etc.).
4. Participating in or creating activities to support social and/or community organisations and reporting them internally and externally, either to our staff or to our partners, to raise their profile.

# 11. Human Rights Policy

ADH Hotels & Resorts supports and protects human rights wherever it can. As a responsible company, we believe strong ethics and good business go hand in hand.

To demonstrate our commitment, we:

- Support the protection of human rights, particularly those of our colleagues, the parties we do business with and the communities where we operate
- Respect our colleagues' rights to voluntary freedom of association under the law
- Provide a safe and healthy working environment
- Do not support forced and compulsory labour or the exploitation of children
- Do not support human trafficking and prostitution.
- Support the elimination of employment discrimination and promote diversity in the workplace
- Promote fair competition and do not support corruption
- Conduct our business with honesty and integrity in compliance with applicable laws
- Develop and implement company procedures and processes to ensure we comply with this policy.



We focus on areas of human rights most relevant to our business ensuring the rights of the local people where we operate are protected.

Where there is a reason to believe any of the above is in existence in a particular Hotel, the employee must report this to the General Manager of the Hotel. The General Manager should then report this to ADH CEO who should take the appropriate action and deal with the local police on this.

# 12. Preventing Tax Evasion Policy

De acuerdo con las Leyes de Sociedades Irlandesas, en ADH Hotels & Resorts, estamos **comprometidos con la lucha contra la evasión fiscal y su prevención**. Para ello, establecemos una serie de hechos que no aceptamos:

- **Engage** in any form of facilitating tax evasion or foreign tax evasion.
- **Aid, abet, counsel or procure the commission** of a tax evasion offence or foreign tax evasion offence by another person.
- **Fail to report promptly any request or demand** from any third party to facilitate the fraudulent evasion of tax or any suspected fraudulent evasion of tax by another person, in accordance with this policy.
- **Engage** in any other activity that might lead to a breach of this policy.
- **Threaten or retaliate** against another individual who has refused to commit a tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy.

is for illustrative purposes only:

1. You become aware, in the course of your work, that a third party has made or intends to make a false statement relating to tax, has failed to disclose income or gains to, or to register with, the required tax authority has delivered or intends to deliver a false document relating to tax, or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority.
2. You become aware, in the course of your work, that a third party has deliberately failed to register for VAT or failed to account for VAT.
3. A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
4. You become aware, in the course of your work, that a third party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions.
5. A supplier or other subcontractor is paid gross when they should have been paid net or requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
6. A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly.
7. A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided.
8. You receive an invoice from a third party that appears to be non-standard or customised..
9. A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated.
10. You notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided.
11. A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

ADH Hotels & Resorts obligations includes taking steps to **detect and report tax evasion by the firm, its employees and its servicers**.

Due to this heightened obligation and the connection with money laundering legislation, all Company employees are required to be vigilant to the **risk of tax evasion in their dealings** on behalf of the firm and in conducting **transactions for the firm** and in **overseeing the conduct of services by delegates and services appointed by the firm and its partners/investors**.

Tax evasion, facilitating tax evasion and turning a blind eye to tax evasion are crimes and therefore will result in **disciplinary action**, as well as **potential criminal enforcement**. You are **encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion** at the earliest possible stage. You must notify your line manager or Director of Finance **immediately**. Alternatively please refer to whistleblowing procedure.

# 13. Anti-Bribery & Corruption Policy

This policy prohibits any member of ADH Hotels & Resorts **from promising, authorising, giving, or offering payment of money or anything of value** (including, but not limited to, non-cash gifts, meals, entertainment, benefits, charitable donations, memberships, etc.), **or providing any other benefit directly or indirectly** (i.e. through third parties such as agents) **to a Covered Official** (as defined below) to induce the recipient to misuse his or her official position or to obtain an improper advantage in connection with the Company's business. Given the Company's U.S.-managed shareholders, U.S. criminal statutes apply to the Company and all Covered Persons with regards to anti-bribery and corruption matters.

## 1.

### Anti-Bribery Provision

It is prohibited for an employee, in the performance of his or her duties, to give a benefit to any person for the purpose of securing or expediting a service, in particular, no such benefit or payment should be given to an Official.

Covered Persons making business payments on behalf of the Company must always ensure that any such payments:

- Reflect the actual value of the services provided
- Are made for a proper business reason
- Are made to legitimate service providers/counterparties are accurately and completely recorded, and meet the requirements of the laws of the jurisdictions in which we operate.

Under the anti-bribery and corruption regulations referred to above, the Company and Covered Persons may be held liable for consciously disregarding indications that a third party may be making improper payments. If any Covered Person were to have suspicions regarding any improper use of Company funds in relation to bribery and corruption, they should immediately report this under the Company's Whistleblower Policy (14).



## 2.

### **Maintaining Accurate Records**

The anti-bribery legislation also prohibits internal fraud; the submission of false or misleading records (e.g., mis-stating the number of guests at a business dinner in an employee expense report or attaching a fictitious receipt to support an expense report). These are criminal offences under anti-bribery and corruption laws and also contravene the general principles of this Code.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must accurately reflect the Company's transactions, and must be maintained in accordance with The Company's system of internal controls.

Any Covered Person who creates or causes the creation of a false or misleading record or accounting entry, or fails to disclose payments, assets or liabilities will be subject to disciplinary action. If you learn of any false or misleading entries, or unrecorded payments, you should report them immediately to Senior Managers or a Compliance Officer.

## 3.

### **Restrictions on reimbursements and use of cash**

The Company will only pay reimbursements for goods, services, or other expenditures that are fully and properly supported by third-party invoices or receipts.

With the exception of normal and customary petty cash requirements, cash transactions in connection with the company business are to be avoided.

Cash or cash equivalents may never be provided to a Covered Official unless approved by Senior Management in advance.



# 14. Whistleblowing Policy

## What is Whistleblowing?

Whistleblowing occurs when a worker raises a concern or discloses information which relates to wrongdoing, illegal practices or unethical conduct which has come to his/her attention through work.

## Our Commitment

This organisation is committed to maintaining an open culture with the highest standards of honesty and accountability where our workers can report any concerns in confidence. It is intended to encourage and enable employees to raise concerns within our work environment without fear of being penalised or threatened with less favourable treatment, discrimination or disadvantage.

Our objectives are to encourage you to feel confident and safe in raising concerns and disclosing information, to provide avenues for you to raise concerns in confidence and receive feedback on any action taken and to ensure that you receive a response where possible to your concerns and information disclosed and protection from sanctions or threats.

## Who does the policy apply to?

This policy applies to all of our workers including our employees at all levels.

## What types of concerns can be raised?

A concern or disclosure should relate to a relevant wrongdoing such as possible fraud, crime, danger or failure to comply with any legal obligation which has come to your attention in connection with your employment and about which you have a reasonable belief of wrongdoing.

Employees should report any information which shows that any of the following has occurred or is likely to occur:

- The commission of a criminal offence.
- Any act that is in conflict with the ethical and professional standards expected under the company Code of Ethics.
- Facilitating or turning a blind eye to unlawful or unethical behaviour by employees or servicers.
- Committing or facilitating money laundering or terrorist financing.
- Non-compliance with legal or supervisory obligations.
- Committing, facilitating or turning a blind eye to tax evasion by employees, servicers or business partners.
- Possible fraud, bribery or corruption.
- False or misleading accounting practices.
- Using ADH Hotels & Resorts for personal gain or gain for a friend or family member.
- Neglect or abuse of position, including acting under conflicts of interest.
- Retaliation on a whistle-blower.
- Practices that put employees at risk, unsafe practices.
- Actions that might put employees at risk of collusion.
- The deliberate concealment of any of the above.
- Other unethical conduct.

## What types of concerns should NOT be raised under this Procedure?

A personal concern, for example a grievance around your own contract of employment would not be regarded as a whistleblowing concern and would be more appropriately processed through our Grievance Procedure.

## Safeguards and Penalisation

A worker who makes a disclosure and has a reasonable belief of wrongdoing will not be penalised by this organisation, even if the concerns or disclosure turn out to be unfounded.

Penalisation includes suspension/dismissal, disciplinary action, demotion, discrimination, threats or other unfavourable treatment arising from raising a concern or making a disclosure on the basis of reasonable belief for doing so. If you believe that you are being subjected to penalisation as a result of making a disclosure under this procedure, you should inform to the CEO ADH Hotels & Resorts immediately.

Workers who penalise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

Workers are not expected to prove the truth of an allegation. However they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action may be taken against any worker who is found to have raised a concern or raised a disclosure with malicious intent.

## Confidentiality

This organisation is committed to protecting the identity of the worker raising a concern and ensures that relevant disclosures are treated in confidence.

The focus will be on the wrongdoing rather than the person making the disclosure.

## Raising a Concern

Concerns can be raised through ADH's senior management, or in writing to [conecta@adhoteles.com](mailto:conecta@adhoteles.com).

We will ask you to give us the background and history of the problem, and to provide us with relevant details. The sooner you express your concern, the easier it will be for us to deal with the matter quickly.

Once you have raised your concern with us, we will arrange a meeting to discuss the matter with you in strict confidence. You can choose whether or not you wish to be accompanied by a colleague or trade union representative.

In regard to confidentiality, it is important that there should be an awareness of respecting sensitive company information, which, while unrelated to the disclosure, may be disclosed in the course of a consultation or investigation process.





## How we will deal with your disclosure

Having met with you in regard to your concern and clarified that the matter is in fact appropriate to this procedure, we will carry out an initial assessment to examine what actions we need to take to deal with the matter.

If, on foot of the initial assessment, we conclude that there are grounds for concern that cannot be dealt with at this point, we will conduct an investigation which will be carried out fairly and objectively. The form and scope of the investigation will depend on the subject matter of the disclosure.

In this regard we undertake to communicate with you as follows:

- We will acknowledge receipt of your disclosure and arrange to meet with you as outlined above.
- We will inform you of how we propose to investigate the matter and keep you informed of actions, where possible, in that regard including the outcome of any investigation, and, should it be the case, why no further investigation will take place. However it is important to note that sometimes the need for confidentiality and legal considerations may prevent us from giving you specific details of an investigation.
- We will inform you of the likely time scales in regard to each of the steps being taken but in any event we commit to dealing with the matter as quickly as practicable.

Where a concern is raised or a disclosure is made in accordance with this policy, but the allegation is subsequently not upheld by an investigation, no action will be taken against the worker making the disclosure and the worker will be protected against any penalisation. It is important to note that if an unfounded allegation is found to have been with malicious intent, then disciplinary action may be taken.

## How the matter can be taken further

We acknowledge that there may be circumstances where an employee wants to make a disclosure externally, and the legislation governing disclosures — The Protected Disclosures Act 2014 — provides for a number of avenues in this regard. It is important to note however that while you need only have a reasonable belief as to wrongdoing to make a disclosure internally, if you are considering an external disclosure, different and potentially more onerous obligations apply depending on to whom the disclosure is made.

This policy will be communicated as appropriate and will be subject to regular monitoring and review in consultation with our workforce and their representatives.

# 15. Anti-Money Laundering Policy

The objective in anti-money laundering regulation is to put the obligation on companies in sectors that are frequently used for the purpose of money-laundering, to take **steps to detect and prevent the use of their company for the purposes of money laundering**. This can involve spotting signs that a customer may be involved in crime or seeing signs that they are reluctant to give the appropriate information, therefore providing cause for suspicion. The nature of the original crime 'predicate crimes' is not important, however particular focus should be paid to suggestion or links to organized crimes, drugs or terrorism.

Money Laundering is an offence in all European Member States, as is facilitating money laundering or handling the proceeds of crime. Some types of companies, such as banks, casinos and real estate agents are subject to enhanced obligation, these do not apply to hotels or hotel managers at present.

Any employee of the ADH Hotel Group risk being an accessory to, or complicit in, money laundering by failing to detect it or take reasonable precautions to prevent it.



The following constitute the **primary money laundering offences**:

- **Concealing, disguising, converting, transferring criminal property, or removing it.**
- **Entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person.**
- **Acquiring, using or possessing criminal property.**
- **Becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorist property.**

There are also two **secondary offences**:

- **Failure to disclose any of the primary offences.**
- **Tipping-off. Tipping-off is where someone informs a person or people who are, or are suspected of, being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.**

Potentially any member of staff could be caught by the money laundering provisions if they suspect money laundering and do nothing about it or become involved with it in some way.

**Some examples of money laundering are noted below.**

- An individual or company makes a large or unexpected cash payment to the hotel but fails to provide evidence confirming their identity and reason for payment
- An individual or company attempts to engage in “circular transactions” where a payment is made to the hotel followed by an attempt to obtain a refund. For example, a potential guest pays a significant sum, then withdraws and seeks a refund.
- A person or company undertaking business with the hotel fails to provide proper paperwork (examples include charging VAT but failing to quote a VAT number or invoices purporting to come from a limited company, but lacking company registered office and number)
- A potential supplier submits a very (unusually) low quotation or tender. In such cases, the business may be subsidized by the proceeds of crime with the aim of seeking payment from the Hotel in “clean money”.
- Involvement of an unconnected third party in a contractual relationship without any logical explanation.

This list is not meant to be exhaustive and if any member of staff has any suspicions or concerns, they should raise this with their line manager and/or their finance director. Law enforcement agencies will prosecute firms and individuals for assisting a money launderer, whether or not that entity is subject to the obligations to have policies and procedures. Companies and individuals are responsible for complying with their obligation not to facilitate or assist with money laundering.

**As part of our company policy the Hotels;**

- Do not accept more than €1k in cash for the payment of invoices. Bank checks are also considered as cash.
- Undertakes appropriate checks before processing any refunds and funds can only be refunded back to the original payer and cannot be refunded to a third party.
- For guest staying at the hotel, the company obtains a minimum level of personal information from a customer when they complete the guest registration card, this includes the guests name and signature, it may also include the guests home address, email address and phone number if provided by the guest.



C/ Albasanz, 15B 3º A  
28037, Madrid · Spain



T +34 91 005 26 72  
[www.adhhotels.com](http://www.adhhotels.com)