

# Strawberry



# Code of Conduct

Strawberry

| <b>Responsible:</b>                | <b>Last updated:</b> | <b>Applies to employees:</b> | <b>Country:</b>                        |
|------------------------------------|----------------------|------------------------------|--|
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## Introduction

A visit to us at Strawberry should be a positive and smart choice for our guests, but also for society. It should be easy to live and sleep well with us. We're saving money and the environment by reducing energy consumption, and we strive to ensure that everything we need to deliver the ultimate hotel experience has been produced and supplied with concern for both mankind and the environment. This means that we care!

It isn't always easy to do the right thing in our busy everyday lives – so we have created some simple guidelines about how we can achieve this in practice. Guests, employees, suppliers and the community should be safe in the knowledge that our company is something to be proud of. Here is our code of conduct.

## Our Values

Our values describe who we are and what we represent. They should steer all our decision making, whether we are building a new hotel, buying bread for breakfast or cleaning a room. We are creating value for both the company and the community. The way in which our hotels earn money is important. At Strawberry we create value for both the company and the community – because it is right and because it is profitable.

## We Care

We care about our guests, our employees and the people outside the hotel doors. Our employees are the most important contributors to the experience we offer our guests. Together, we will show the world that we care.

## We are open and honest

At Strawberry we should have an open culture. We shall be a benefit to the community, but we are not perfect. We are willing to meet and discuss what we do well and what we can do better, and we never promise more than we can deliver.

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## Who

Our code of conduct explains what we expect of our employees and suppliers. It also demonstrates to both our guests and the community what they can expect from us as a company.

## Employees

By employees, we mean everyone who has a contract to carry out work in and for Strawberry. That means: employees in company hotels, employees in franchise hotels, permanent and temporary employees, agency workers, managers and board members. This code of conduct describes both our expectations of our employees, but also what employees can expect of Strawberry. Managers have a particular responsibility to ensure that their own and their employees' behavior is consistent with the guidelines.

## Suppliers

By suppliers, we mean everyone who provides products and services to us, including those working for the suppliers. If our suppliers do something wrong, this can impact negatively upon us. And, it is positive for us if we find new and more sustainable solutions. For this reason, we have to be clear about what we expect from our suppliers.

## Guests

When we follow the code of conduct, our guests can be safe in the knowledge that we operate our hotels properly. They can be sure that the person who cleans their room or works on reception is earning a fair wage, that we are working constantly to reduce the environmental impact of our business and that their bed linen and food has been produced sustainably. Our code of conduct demonstrates to our guests what we stand for.

## Community

Our code of conduct explains what ethics actually means to us in our role within the community. As a large company with over 12,000 engaged employees, we can influence the hotel business as a whole, the countries we operate in and the local community around our hotels. Our code of conduct demonstrates to the outside world just what they

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can expect from us.

## Important Issues

For a company as large as Strawberry, there are many important issues. We cannot do everything, however, and for this reason we place greater emphasis on the following issues:

### Environment

By running hotels, we affect the environment and the climate. Therefore Strawberry wants to take a particular responsibility for the environment. We take this responsibility very seriously. This means that we do not simply fulfill our legal obligations, but we also lead the way in developing a greener society. For us, this means working towards becoming:

- A climate-neutral company
- A company which does not emit pollutants
- A developer and hotel operator which does not endanger biodiversity. Everything we do shall be done with a minimal use of nature's resources.

### Diversity

Diversity makes us better. It means that we recruit skilled personnel regardless of their background; we generate more and better ideas than we would if we all thought alike; and we reflect the society of which we are part. Respect and an interest in what makes us different is part of what makes us a better company, where we not only look after our guests, but also each other. We will strive to meet the requirements of our guests' diverse needs. We achieve this by creating a hotel experience and an offer which neither discriminates nor excludes.

### HSE

Everyone working for and in Strawberry shall have a safe and healthy working environment.

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## Workers' Rights

Everyone working for Strawberry and our suppliers shall have the right to freedom of association and the right to collective bargaining. Everyone who works for Strawberry has the right to standard wages in accordance with national laws and agreements. We shall create a safe and positive working environment through good cooperation with workers' representatives and safety representatives.

## Human Rights

We, as a company and through our suppliers, shall support and respect international human rights and avoid infringing upon these.

## Food and Health

Food influences people, animals and the environment, both in production and use. Therefore, wherever possible, we will select food which is sustainably produced and protects the welfare of animals. And, we shall make it an attractive option for our guests to select healthy and sustainable food.

## Criminality and prostitution

We do not accept criminality or prostitution, either in our hotels or from our suppliers.

## Corruption and bribery

Corruption is both illegal and detrimental to society. All forms of corruption and bribery are unacceptable to us, our suppliers and those we cooperate with.

## Competition

Strawberry values equal competition. Price fixing and other activities which distort competition are illegal and should not occur. All procurement, cooperation and agreements should be characterized by open and transparent processes.

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## Financial / economic services

The financial accounts of Strawberry are part of Anker Holdings' consolidated accounts, and we shall publish figures which provide a correct and clear picture of our operations. We will undertake and publish accounts in accordance with all relevant laws, regulations and good practice.

## How we work

We achieve the goals we have set through everyone who works for Strawberry and their suppliers. For this reason, we have our code of conduct for both employees and suppliers.

## Whistle blowing

Whistle blowing or alerts means raising issues concerning unacceptable situations with the people who can do something about them. Unacceptable situations are breaches of laws, contracts or promises and breaches of internal regulations or our code of conduct. Alerts should be made to those people in Strawberry who can most effectively handle the situation, or to those who are in a position to notify the relevant authorities.

## Alerts are good

Alerts are positive both for the company and for society, because unacceptable situations can be corrected. People who are willing to alert us are an important resource.

## Right and duty to inform

Employees, business partners, guests and society in general are encouraged to alert us about any unacceptable situations, because this can lead to the improvement of our company. Everyone who works for Strawberry has a duty to inform us of any criminal activity and any activity which endangers life and health.

## Following up on alerts

Management must assess how they deal with alerts. Unacceptable situations must be rectified. The person who raised the alert shall receive a response within one week. This response may

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take more time for complicated situations involving parties other than Strawberry. If it transpires that the alert was unnecessary or based upon a misunderstanding, then the person who raised the alert shall receive a full explanation.

## For employees

Both the specific case and the situation will determine how best to raise an alert in Strawberry. Below, you will find a starting point for what we believe is the best approach for our company.

### To the responsible body or person

Initially, everyone should raise the alert with their direct manager or the body responsible for the situation to which the alert relates:

- All alerts can be raised with a direct manager.
- Personnel cases should be raised with a workers' representative or with the company health service.
- Environmental issues or a poor working environment should be raised with the working environment committee manager or with the safety representative.
- Breaches of tax laws or rules governing bribery/corruption can be raised with the director of finances. If the issue cannot be raised with any of the above, the hotel manager, HR manager or hotel director should be alerted.

### To chain management

If the person who raises the alert receives no reaction or feedback, that person is encouraged to inform chain-management, HR central or group management within Strawberry.

### External alerts

Our company has established good internal alert systems. Having said this, individuals maintain the right to take their concerns to official bodies handling relevant cases.

### Anonymity and confidentiality

Raising alerts can be done confidentially, but in most cases openness will ensure better



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progress and a better result for all concerned parties. The name of the person raising the alert is, however, confidential.

## Consequences

Anyone found to have broken the code of conduct at Strawberry will face the consequences. Where there are repeated or serious breaches, this can result in the termination of employment. If a supplier breaches the code of conduct, then that supplier shall inform us as soon as possible so that, together, we can formulate a plan to rectify the situation. The situation should be rectified without undue delay. If, after repeated instances, the supplier does not appear willing to improve the situation, then the contract can be terminated.

## Monitoring and reporting

We can already measure the most important signs that our ethical work is succeeding, through the company's profitability, our satisfied customers and employees. To follow up on work with our code of conduct, we will also monitor the number of discussions about ethics in the management groups. We also plan to log any breaches of the code of conduct, and how these breaches have been followed up. The results will be reported to group management on an annual basis. Every year we report on our goals and results within social responsibility to the wider world. Our work on ethics will form a part of this reporting.