

Code of Conduct

Issued by: The Board of Directors – BWH Hotels Scandinavia

Version: 26th of September 2024

Table of contents

§ 1	About the Code of Conduct	3
§ 2	Compliance	3
§ 3	Human rights	3
§ 4	Accessibility	3
§ 5	Work environment	4
	<i>Freedom of association and union organization</i>	<i>4</i>
	<i>Equality and diversity</i>	<i>4</i>
	<i>Sexual harassment and victimisation</i>	<i>4</i>
	<i>Health, safety and quality</i>	<i>4</i>
	<i>Alcohol and drugs</i>	<i>4</i>
§ 6	Environment	4
§ 7	Business ethics and anti-corruption	5
§ 8	Reporting wrongdoing	5
§ 9	Confidentiality and privacy	5
§ 10	Checking compliance	6

BWH Hotels is a membership-based organization. In operating our hotel business, we work to create a solid foundation and sustainable future for us and our stakeholders. Together with our member hotels, we take responsibility for the economic, environmental and social impact that our business has on our surrounding world.

§ 1 About the Code of Conduct

This Code of Conduct has been approved by the Board of BWH Hotels in Scandinavia with the purpose of ensuring that our business is conducted in an ethical and proper manner. Our Code of Conduct applies to all member hotels in Scandinavia affiliated with BWH Hotels. Each hotel owner is responsible for implementing the Code of Conduct within their business. The CEO of BWH Hotels has the ultimate responsibility for this Code of Conduct, which is revised once a year or more often if required.

§ 2 Compliance

It is of the utmost importance that all our businesses are run in a lawful manner. BWH Hotels therefore always follows national legislation in the countries in which we operate. Our Code of Conduct is based on the UN Global Compact's 10 principles concerning human rights, labour, the environment and anti-corruption, and constitutes a minimum requirement for our business. If local, national or international legislation dictates stronger protection than the requirements in our Code of Conduct, the legislation must be complied with. Similarly, all members within BWH Hotels must be aware of national legislation or whether compliance with such legislation contravenes international standards of human rights.

§ 3 Human rights

We must always support and respect internationally recognised human rights. We never accept forced labour, slave labour, child labour or labour that is carried out against someone's will. At BWH Hotels, the minimum age for full-time work is 16. Employees under the age of 18 must not carry out heavy or dangerous work and must also not work at night. BWH Hotels is strongly opposed to all types of human trafficking and never accepts prostitution at member hotels. All member hotels must actively work to combat incidents of prostitution, for example through employee training and providing clear guidelines on how staff should act in these situations.

§ 4 Accessibility

BWH Hotels naturally recognises the equal value and equal rights of all people. Every member hotel is obliged to follow the laws and statutory requirements concerning accessibility that exist in their country. Under the UN Convention on the Rights of Persons with Disabilities, the way people are treated is also an important part of accessibility work. Hotels that are members of BWH Hotels must work actively to adapt the physical environment. The aim is that everyone with a disability should be able to visit our hotels or seek employment within BWH Hotels.

§ 5 Work environment

Where there are issues relating to the work environment, it is the job of the supervisor, head of department or senior management to ensure that measures are put in place with immediate effect. It is also senior management's responsibility to implement a work environment policy and have a long-term plan to prevent any situations that could cause future shortcomings in the work environment at member hotels.

Freedom of association and union organization

The right to freedom of association and the right to collective bargaining are to be respected in line with the Conventions of the International Labour Organization (ILO) and applicable national laws and regulations in the country in question.

Equality and diversity

BWH Hotels is to be a workplace where everyone is treated equally and offered the same opportunities. There is therefore zero tolerance of discrimination in any form on the grounds of gender, transgender identity or expression, ethnic background, religion or other belief, disability, sexual orientation or age. All BWH Hotels' members must actively work to prevent and deal with discrimination and to promote equal rights and opportunities.

Sexual harassment and victimisation

BWH Hotels will never tolerate sexual harassment or victimisation. Sexual harassment is any kind of unwelcome sexual behaviour – in the form of words and/or actions – that causes someone to feel degraded, stressed or uncomfortable. Victimisation is any action targeted at one or more colleagues in a way that could lead to ill-health or to those people being excluded from the workplace community.

Health, safety and quality

BWH Hotels is concerned about the health and safety of everyone at the hotels, both staff and guests. It is essential that the member hotels work on an ongoing basis to reduce and prevent the risk of accidents. Any accidents that do happen must be attended to quickly and professionally. The member hotels must make themselves fully prepared for accidents by ensuring that employees are familiar with L-ABC (Life-threatening situation, Airways, Breathing, Circulation) and can give first aid and CPR (Cardiopulmonary resuscitation). All employees must be trained about what to do and how to act in various situations that are a threat to safety and security, such as robbery, terrorist threats, fire, bomb threats, identity theft and assault. BWH Hotels has a comprehensive crisis management plan in the event, for example, of threats, damage and fire to minimise injuries and risks to employees and guests.

Alcohol and drugs

Our workplace must always be an alcohol and drug-free environment. Employees on duty who are under the influence of alcohol or drugs must be immediately removed from the workplace. The person responsible for their removal and follow-up is always their line manager and/or head of department, who is also responsible for drawing up a solution for the employee.

§ 6 Environment

All hotels that are a member of BWH Hotels must be eco-labelled in accordance with an approved Scandinavian standard, such as the Nordic Swan Ecolabel, Green Key or Eco-

Lighthouse. The environmental certification must be achieved within six months of the member hotel joining BWH Hotels. All environmental work is to be based on the precautionary principle. Each member hotel is expected to implement an individual action plan that includes measures for a reduction in energy consumption, water consumption, use of chemical products and waste. The aim of the action plan is to increase the hotel's contribution to a sustainable society through active measures, measurements and documentation, plus staff training and information. BWH Hotels' members should also use and contribute to the development of eco-friendly technology, as much as they can. Where possible, members should offer local products and locally produced goods.

§ 7 Business ethics and anti-corruption

BWH Hotels follows all national and international laws and regulations to prevent, uncover and deal with corruption. Corruption means exploiting your position to achieve an improper benefit for your own or another party's gain.

Bribes are always prohibited within BWH Hotels. A bribe is an improper benefit that someone receives, accepts the promise of or requests for the completion of a job or assignment, or that someone gives, promises or offers within the framework of a job or assignment.

§ 8 Reporting wrongdoing

The Whistleblowing Act (Swedish Act (2021:890) on the protection of persons reporting wrongdoing) was introduced in order to protect individuals raising concerns about wrongdoing in the workplace. The law aims to facilitate the reporting of 'wrongdoing where there is a public interest in such wrongdoing being exposed'.

The BWH Hotel Group Whistleblowing Policy forms part of the Group's Code of Conduct and any suspicion of failure to comply with the undertakings set out in the Code of Conduct may constitute the type of circumstance which must be reported in accordance with the Whistleblowing Policy.

This protection applies not only to employees of the BWH Hotel Group, but also to job applicants, former employees, shareholders with an active role in the company, business partners, consultants and interns, etc. Any individual who reports wrongdoing must not face any risk of reprisals or other negative consequences.

In the first instance, wrongdoing may be reported verbally or in writing to CFO Thomas Söderstedt, thomas.soderstedt@bwhhotelgroup.se. For further details of how to report any wrongdoing or concerns, as well as how wrongdoing is investigated, please refer to the BWH Hotel Group Whistleblowing Policy.

§ 9 Confidentiality and privacy

BWH Hotels must always protect the individual's right to confidentiality and privacy. We gather and process personal data about guests, employees and customers in line with the EU's General Data Protection Regulation (GDPR). Confidential information is stored securely and may only be shared with authorised individuals, unless the law requires otherwise.

Each member hotel's own personal data policy must clearly state how the hotel processes personal data.

§ 10 Checking compliance

Through their membership of BWH Hotels, members agree to work actively to meet the requirements in the Code of Conduct. To ensure compliance with the Code of Conduct, BWH Hotels provides online courses and ongoing information as part of the joining process for members and the training we offer new employees. The members are responsible for ensuring that any providers and partners follow the Code of Conduct or comparable requirements. The member hotels must be able to present documentation confirming compliance with the Code of Conduct and with other local requirements. Violations of the Code of Conduct must be reported to the CEO of BWH Hotels. Compliance will be checked at least once a year via our Quality Department. Any nonconformities revealed in an audit must be rectified as quickly as possible. BWH Hotels always aims, in the first instance, to conduct a dialogue with members and help them to achieve the standards in the Code of Conduct. As a final sanction, breaches may lead to exclusion. BWH Hotels also has the right to follow up on providers and partners.

For more information on how we handle a range of related topics see BWH Hotels' policy documents.