

Code of conduct & ethical standards

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1. Introduction



Message from the CEO

It is with great pleasure that I introduce our Code of Conduct and Code of Ethics. As we navigate the complexities of our industry and the global landscape, it becomes increasingly important for us to reinforce the principles that define our identity and guide our actions.

Our Code of Conduct serves as a roadmap, outlining the ethical standards and behavioural expectations we hold ourselves to. It is a testament to our collective commitment to integrity, transparency, and accountability in all aspects of our work.

By adhering to these principles, we not only protect the reputation of Wavemaker Hospitality, but also foster a culture of trust and respect.

As part of the Wavemaker family, each of us plays a crucial role in upholding these principles, contributing to a workplace that reflects our shared commitment to doing what is right.

I encourage every team member to familiarize themselves with these guiding documents. Let them serve as a constant reminder of the standards we set for ourselves and the impact our choices can have on our colleagues, customers, and the community at large.

Thank you for your dedication to the values that define Wavemaker Hospitality.

Together, we are not just building a successful enterprise, but a legacy of ethics that distinguishes us in the business world.

Thank you,
Vasilis Nicolaidis | CEO

Commitment to doing what is right

Our mission & vision

As a leading group of hotels, we recognise that the following are vital for the success of our business.

PEOPLE

QUALITY

INTEGRITY

COMMUNITIES

SAFETY

SUSTAINABLE PERFORMANCE

DIGNITY & RESPECT

ACTIONS & EFFECTS UNDERSTANDING

LEGAL COMPLIANCE

Our mission & vision

Responsible business is one of the company's most important values, therefore, one of our main objectives is to operate in the manners of the codes of ethics.

This highlights our commitments and contribution in the challenging times and society we work and live in.

We collectively represent the vision and mission of our organization. It is imperative that each one of us understands and aligns with the company's expectations, goals, and values.

By embracing these expectations, we contribute to the unity of our team and the realization of our shared objectives. Regular communication and feedback mechanisms will be in place to ensure that everyone is on the same page and can actively participate in our mutual success.



Our people

The success of any business is strongly tied to the positive impact of its people.

From dedicated employees to visionary leaders, individuals play a critical role in shaping the course of an organization.

Their passion, commitment, and creativity breathe life into the company, creating an environment where innovation prospers.

Team members who represent a strong work ethic contribute not only to their personal growth, but also to the overall productivity and efficiency of the business.

Effective communication skills empower employees to convey ideas, resolve conflicts, and build strong relationships with clients and colleagues. This not only enhances the internal dynamics of the company but also strengthens external partnerships, paving the way for sustained growth.

In essence, the positive impact of individuals on a business extends beyond mere job responsibilities. It encompasses the cultivation of a vibrant corporate culture, the establishment of strong interpersonal connections, and the continuous pursuit of excellence.

As businesses grows on the collective efforts of their people, recognizing and celebrating the contributions of individuals is fundamental to achieving long-term success and sustainability.



Our principles

In principle, Wavemaker Hospitality is led by the following principles:

01 Harassment and violence free business

02 Non Discrimination Business

03 Safe and healthy work environment

04 Compliance with laws and regulations

05 Diversity

06 Equal employment and personal development business

07 Environmental protection and local communities support

08 Good cooperation with all colleagues



Our clients

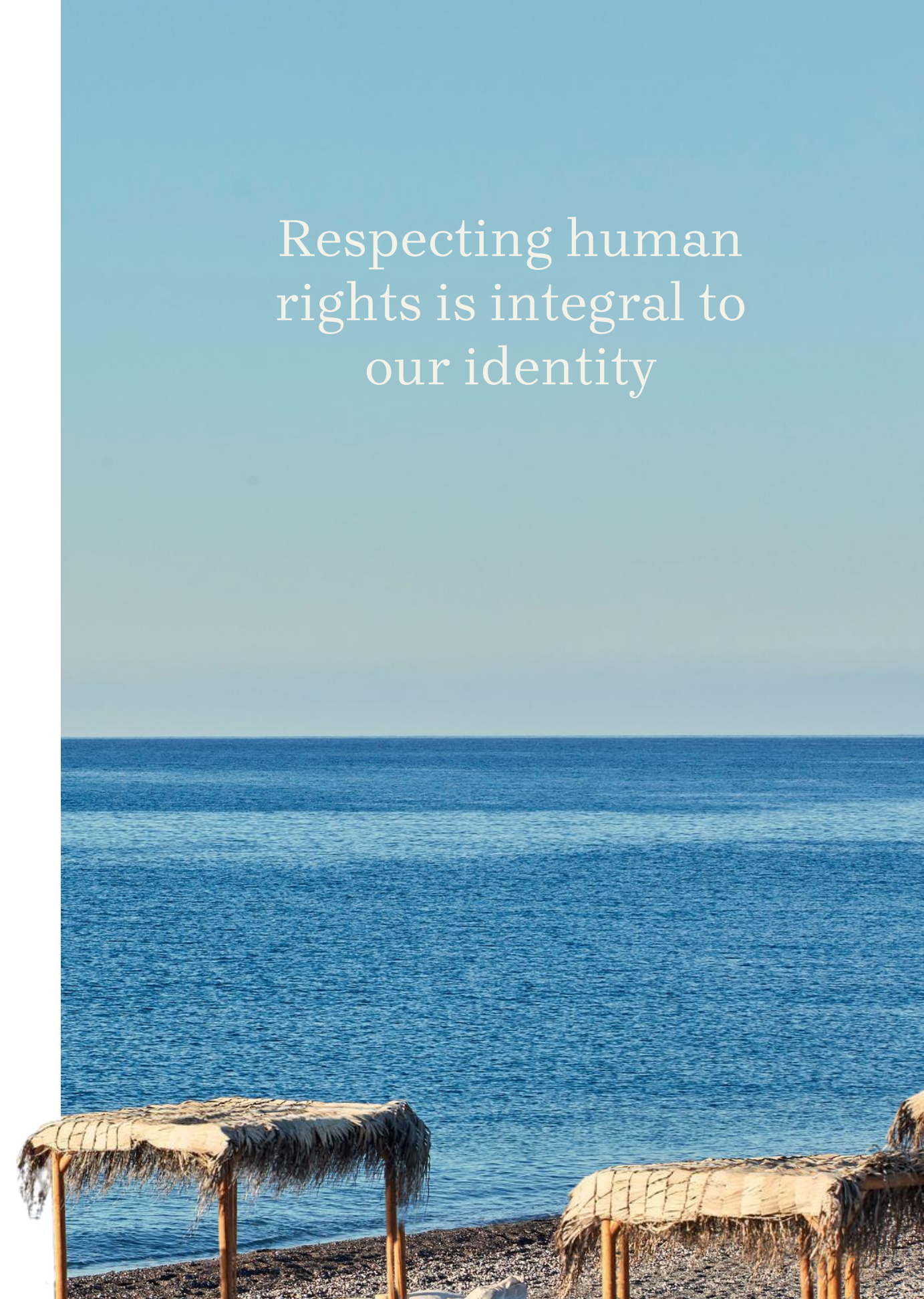
- As an integral part of Wavemaker Hospitality, we extend the principles outlined in our Code of Conduct and Code of Ethics to our esteemed clients.
- These documents serve as a commitment to maintaining the highest standards of integrity, transparency, and ethical business practices in all our interactions.
- Our Code of Conduct emphasizes our dedication to delivering exceptional service, ensuring confidentiality, and fostering a relationship built on trust and respect. It outlines the expectations we have for ourselves as we work to meet and exceed your needs. We will make every effort to protect our client's interest, ensure good channels of communication and protect interest be transparent.
- Simultaneously, our Code of Ethics underscores our commitment to fairness, responsibility, and social consciousness. It guides our decision-making processes, ensuring that the services and products we provide align with ethical standards and contribute positively to the broader community.
- We believe in open communication and collaboration with our clients, and we encourage you to familiarize yourselves with these guiding documents.
- By aligning our values, we aim to create a collaborative and ethical partnership that reflects positively on both Wavemaker Hospitality and our valued clients.

2. Codes of conducts & business ethics

Introduction to code of ethics

- As a company, we are firm in our commitment to act with the utmost integrity and respect for human rights. Our core values are grounded in the belief that ethical conduct is non-negotiable, and we recognize the importance of upholding the dignity and rights of every individual.
- We are driven by ETHOS, a cornerstone of our company's success and a definition of our company's identity.
- Incorporating these principles into our daily practices, policies, and decision-making processes, we aspire to be an example of integrity and human rights promotion within our industry.
- Integrity is the foundation of our operations. We conduct our business transparently, honestly, and accountably, ensuring that our actions align with the highest moral and ethical standards. We hold ourselves to a standard of excellence in all endeavours, even when faced with challenges, and we are dedicated to rectifying any missteps with humility and responsibility.
- We embrace diversity, acknowledging that every person deserves to be treated with fairness, equality, and justice. Discrimination has no place within our organization, and we are committed to fostering an environment that values and celebrates the unique contributions of each team member.
- Our responsibility extends beyond the confines of our offices and operations. We actively engage in initiatives that promote human rights and work collaboratively with stakeholders to address social challenges. Through continuous education and awareness-building, we strive to make a positive impact on the communities we serve.
- By embracing these values, we aim to not only meet legal and ethical standards, but also to contribute to the betterment of society, creating a workplace and business environment where everyone can grow.

Respecting human rights is integral to our identity



Who is affected & how to apply it

01

This Code of Conducts and Ethical Standards serve as guiding principle for every individual associates
Wavemaker Hospitality: employees, customers, suppliers, associates.

02

This document is not only a reflection of our values but also a commitment to upholding the highest standards of integrity, accountability, and respect in all our interactions.

03

The scope of these codes extends to all employees, regardless of their position or department, as well as to contractors, consultants, and partners who represent Wavemaker Hospitality in any capacity.

04

We believe that every member of our extended family plays a crucial role in maintaining our reputation and contributing to the positive impact we aim to create in our community and industry.

05

Whether you are part of our leadership team shaping strategic decisions or a new team member finding your place within Wavemaker Hospitality, the expectations outlined in this documents apply equally to all.

06

To apply these codes effectively, consider how your actions align with the outlined principles. Regularly revisit the codes, engage in open discussions with colleagues, and seek guidance when faced with ethical dilemmas.

By collectively embracing and applying these principles, we contribute to a workplace culture that prioritizes ethical conduct and sets as an organization of integrity.

Professional ethics

- As professionals dedicated to the success and integrity of Wavemaker Hospitality, we hold ourselves to the highest standards of ethical conduct. Our commitment to professional ethics is a cornerstone of our identity and a driving force behind our individual and collective success.
- We recognize that our actions not only reflect on ourselves but also on our colleagues, our clients, and the broader community. By upholding professional ethics, we contribute to a workplace culture that is built on trust, transparency, and mutual respect.
- All our senior executives lead by example, they have the duty to communicate, inspire and guide all their team members.
- In our roles, we encounter various challenges and opportunities. It is during these moments that our commitment to professional ethics becomes particularly crucial. Whether faced with difficult decisions, ethical dilemmas, or day-to-day responsibilities, we must remain committed in our adherence to ethical principles.
- Let us strive to be exemplary professionals in all that we do. This involves making decisions that prioritize the interests of our clients, colleagues, and the greater community. By upholding professional ethics, we not only strengthen the reputation of [Company Name] but also contribute to the positive impact we aim to achieve.



3. Business transparency

Business transparency

We uphold accurate and comprehensive financial records, implementing internal controls to ensure the accuracy and reliability of our financial reports. We thoroughly generate records that accurately reflect our intentions, actions, and decisions, and we adhere to Company policies and legal requirements in retaining them.

Fraud

Fraud is a serious and illegal act. It is carried out with the intent to gain an unfair or unlawful advantage.

We encourage all employees to never allow anyone to convince them to falsify facts or in general, to do something that does not feel right.

We also encourage and inform employees to be alerted and aware of such actions and avoid any engagement.

Facilitated payments

It is illegal to engage in any type of payment to government authorities to facilitate or accelerate the performance of a routine action and our company will not engage in such action.

The provision of discounts or complementary accommodation/food and beverage will only be provided at the discretion of company directors to any third party.

Employees are encouraged to exercise good judgment and discretion when giving or receiving gifts on behalf of the company. If there is any uncertainty about the appropriateness of a gift, employees should consult with the line manager for guidance.

Remember, the primary objective of these guidelines is to maintain the trust of our clients, partners, and stakeholders, and to uphold our commitment to ethical business practices.

Your Responsibility:

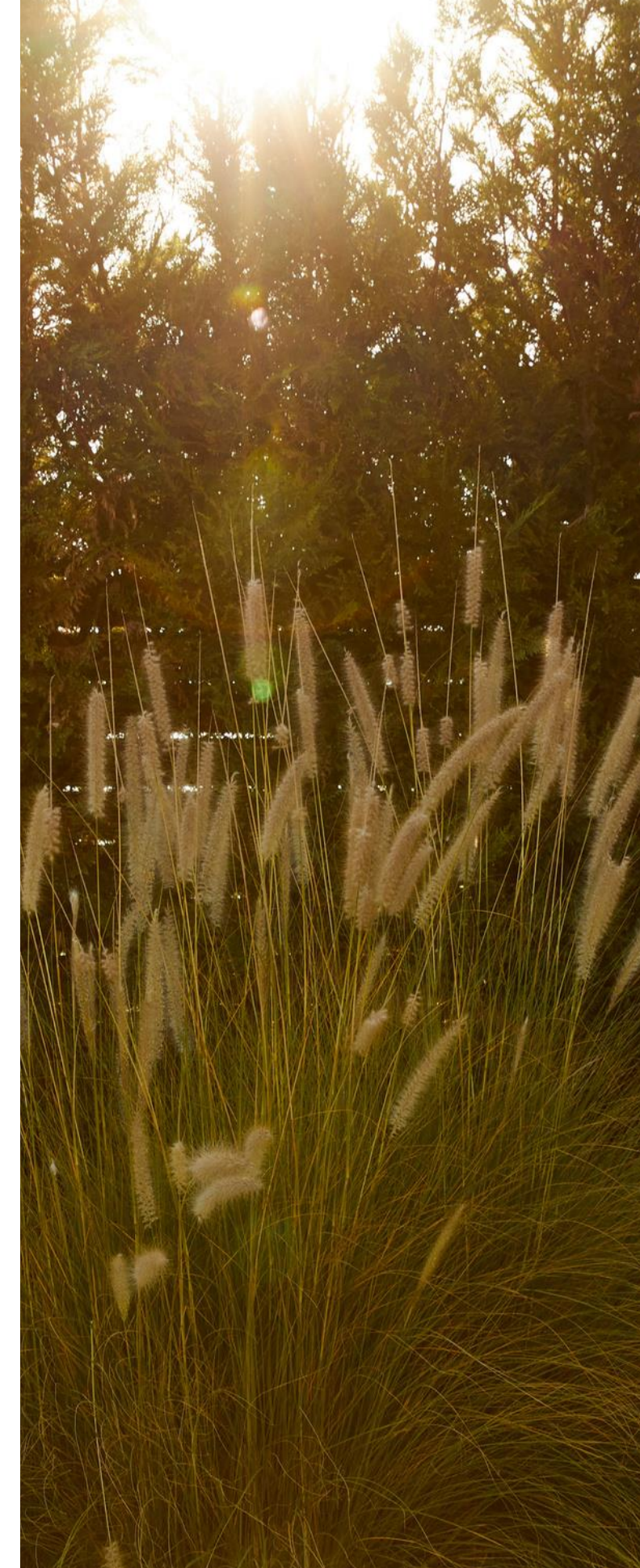
Every employee plays a crucial role in upholding legal compliance within our organization. By familiarizing yourself with and adhering to our policies, you contribute to a positive workplace culture and the overall success of the Atlantica Hotels & Resorts.

Reporting Mechanism:

If you become aware of any potential legal compliance issues or concerns, we encourage you to report them by sending an e-mail to:

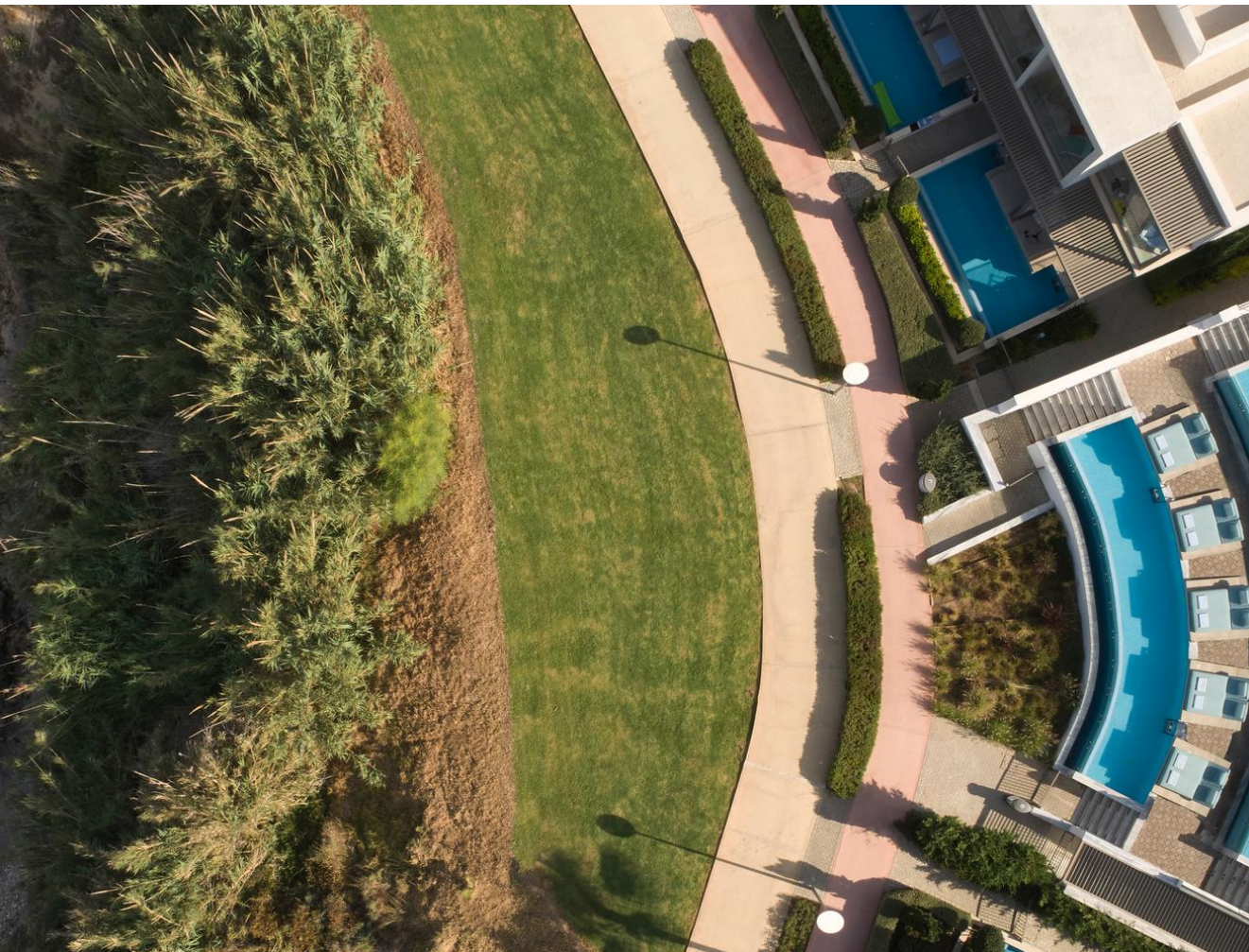
compliance@wavemakerhospitality.com

Your prompt reporting allows us to address and rectify any potential issues efficiently.



Legal compliance

At Wavemaker Hospitality, we take pride in conducting our business affairs ethically and in full compliance with applicable laws and regulations. Legal compliance is not only a legal requirement but also a fundamental aspect of our commitment to integrity and responsibility



Anti-discrimination & harassment policies

We have procedures in place to ensure a workplace free from discrimination and harassment. For more details refer to the detailed Discrimination & Harassment procedure.

Workplace health & safety

Employees and Customer safety and well-being are our top priority. Wavemaker Hospitality is committed to comply with all safety guidelines, report any concerns promptly, and actively participate in maintaining a safe work environment. All employees are trained and encouraged to follow this commitment. Wavemaker Hospitality maintains robust Quality, Environmental, HSE& Food Safety Management systems, for more details refer to the required process, procedure or risk assessments.

Data protection & privacy

Protecting the privacy and confidentiality of both employee and customer data is paramount. Wavemaker Hospitality management and employees adhere to the data protection management systems and policies to maintain the trust of our clients partners and employees.

Conflicts of interest

We intent to be aware of and avoid situations that may pose a conflict of interest. Our policies aim to ensure that employees act in the best interests of the company at all times.

What is compliance?

Compliance is the act of adhering to company processes, procedures, rules, regulations, laws, or standards set by authorities, organisations, or governing bodies. It is expected that every employee conduct their activities in accordance with the prescribed guidelines and follow established norms.

Compliance requirements

Understanding the Basics:
Familiarize yourself with the company's processes, procedures and compliance requirements. Know the key compliance areas relevant to your role and responsibilities.

Ethical Decision Making:
Recognize and prioritize ethical considerations in your daily tasks.
Seek guidance when faced with situations that may have compliance implications.

Compliance reporting

Spot a compliance issue? Report it!
Timely reporting is essential for addressing concerns and maintaining our standards

Discrimination & harassment

Wavemaker Hospitality has developed discrimination & harassment process. Hotels should develop and communicate clear policies against discrimination and harassment.
A detailed protocol for handling complaints related to discrimination or harassment should be established.
Each hotel should ensure that employees are provided with reporting channels related to discrimination concerns.

Sustainability

Our commitment to sustainability goes beyond preference—it's a regulatory necessity. By complying with sustainable practices, we not only meet legal requirements, but also contribute to a healthier planet. Each sustainable choice you make has a positive wave effect. Let's embrace these practices wholeheartedly, ensuring a better, greener future for all.



Management systems & certifications

Majority of hotels hold valid international ISO standards certifications, it is imperative that we adhere to these standards to ensure the best possible outcomes. Please be reminded to strictly follow the established guidelines and procedures outlined in the management systems for your respective roles.

Your commitment to upholding these standards is crucial in maintaining the highest quality and service excellence across our operations. If you have any questions or require clarification on specific ISO requirements, feel free to reach out.

Let's collectively contribute to the continued success of our hotels by maintaining firm adherence to these international standards.

Documents & records keeping

All employees are expected to accurately maintain and update required records in accordance with company processes and procedures.

Understand the importance of thorough documentation for audits and reviews.

Each Hotel should ensure records and documentation is kept to prove compliance at all times.

Records should be made available for review and evaluation internally and externally.

Records and documentation should not show gaps to confirm continuity.

Records of measurements and analysis should be kept and assessed regularly.



Licences

Hotels should maintain all necessary licenses and permits for the operation of the hospitality establishment in easy accessible files and in secured offices/electronic folders.

Hotel teams should maintain a master list (provided by the compliance department) of all licenses and permits required for the operation of the establishment.

A tracking system of date renewals should be established to ensure timely renewals.

Assign responsibility for tracking and renewing licenses to specific individuals or departments.

Implement a reminder system to ensure timely renewal and prevent lapses.

A checklist for the renewal process should be developed, including required documentation and deadlines. Regular internal reviews should be conducted to confirm that all licenses are up-to-date.

Hotel teams should establish a contingency plan in case of unexpected license issues or delays.

Records of legislations & regulations

All relevant local, national and international laws and regulations applicable to the hospitality should be identified and kept updated at all times.

Group Compliance Team maintains list of legal requirements related to the hospitality industry.

Each hotel is required to fully comply with all regulations/legislations listed in the List of Legal requirements.

Food safety

Ensuring food safety compliance in hotels involves a systematic process to maintain high standards and prevent potential health risks. Each hotel must maintain fully developed food safety management systems and ensure compliance.

Audits & spot checks

Hotel QSSLC (Quality, Safety, Sustainability Lead & Compliance) teams should conduct regular inspections and trainings to ensure compliance with hygiene and safety standards (inspections should be both internal and external by respective experts).

QSSLC teams should conduct surprise inspections to ensure that staff adheres to established protocols.

All inspection results should be documented and corrective actions implemented promptly.

Health & safety

Prioritizing safety is a shared responsibility. It's imperative that each team member diligently follows company's safety guidelines and procedures.

Hotel Teams firm commitment to these procedures is vital for adopting a secure and protected workplace for everyone. Regular HSE audits must be carried out by QSSLC to ensure the compliance.

HSE Risk Assessments should be available in each hotel unit and regularly updated.



Anti bribery procedures

Why Anti-Bribery Policies Matter?

At Wavemaker Hospitality, we believe in conducting business with the highest levels of integrity and transparency. Bribery, in any form, is not only illegal but also undermines the trust and credibility that are essential to our success as a company.

Reporting Mechanism

If you become aware of any potential violation of our Anti-Bribery Policies, it is your responsibility to report it promptly. We encourage open communication, and you can report concerns through compliance@wavemakerhospitality.com

Our Anti-Bribery Policies are in place to

Ensure Compliance with Laws

We are dedicated to complying with all applicable laws and regulations related to bribery and corruption.

Protect Our Reputation

By adhering to these policies, we protect the reputation of our company and the trust our clients, partners, and stakeholders place in us.

Zero Tolerance for Bribery

Our company has a zero-tolerance policy for any form of bribery or corrupt practices. This includes but is not limited to offering, giving, receiving, or soliciting anything of value to influence the actions of others.

Key Components of our Anti-Bribery Policies

Prohibition of Bribery:

The company policy explicitly prohibit the offering, giving, receiving, or soliciting of any form of bribe or corrupt incentive.

Gifts and Entertainment Guidelines:

Clear guidelines are provided regarding acceptable and unacceptable gifts, hospitality, and entertainment to ensure they do not compromise integrity.

Third-Party Due Diligence

We conduct due diligence on third parties, such as suppliers and business partners, to ensure they share our commitment to ethical business practices.

Conflict of interests

A conflict of interest occurs when an individual or entity is in a position to exploit their professional or official capacity in some way for personal gain. In other words, it arises when someone's personal interests or relationships could influence, or be perceived to influence, their ability to make objective and impartial decisions in the best interest of an organization or another party.

Conflicts of interest can manifest in various forms and across different contexts, such as business, government, or non-profit organizations.

We believe that proper management of conflicts helps maintain transparency, protects the integrity of decision-making processes, and ensures that individuals act in the best interests of the organization they represent.

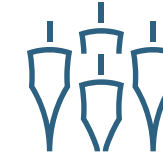
Disclosure and transparency are key components of addressing conflicts of interest, and individuals should be encouraged to report potential conflicts to the relevant authorities within the company.

Proper
management
of conflicts protects
integrity



Financial Interest

A person might have a financial interest in a company, supplier, or client that could affect their decisions or actions.



Personal Relationships

Relationships with family members or friends can sometimes create conflicts of interest, especially if those individuals are involved in business transactions or decisions. A clear segregation of duties and controls should be implemented in such cases.



Gifts and Favours

Accepting gifts, favours, or other benefits from individuals or entities with whom one has a business relationship can create conflicts of interest.



Outside Employment

Balancing multiple roles can sometimes lead to conflicts. Carefully evaluate outside employment prior to engaging.

Conflict of interests

Identification & disclosure

All employees, contractors, and representatives of Wavemaker Hospitality have a responsibility to promptly identify and disclose any actual or potential conflicts of interest.

A conflict of interest may arise when an individual's personal interests or relationships could compromise, or have the appearance of compromising, their ability to act in the best interest of Wavemaker Hospitality.

If an employee becomes aware of a conflict of interest, they must disclose it in writing to their immediate supervisor or the send an email to: compliance@wavemakerhospitality.com as soon as possible.

Evaluation & assessment

Upon receiving a disclosure of a potential conflict of interest, the Directors and Compliance Officer will evaluate the situation to determine the significance of the conflict.

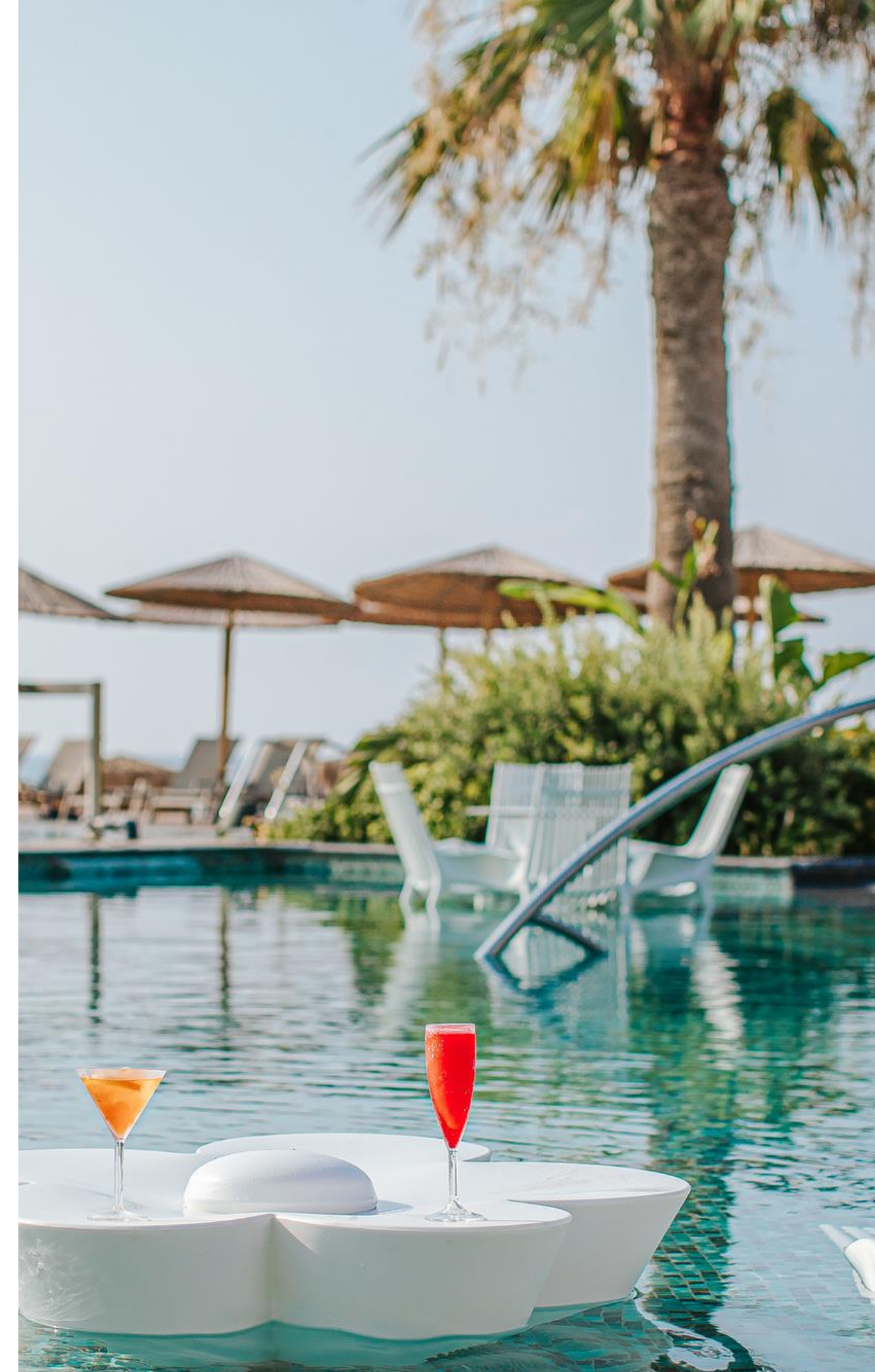
Factors to be considered in the assessment include the nature and extent of the conflict, the potential impact on the individual's objectivity, and the potential impact on the interests of Wavemaker Hospitality.

The Directors and Compliance Officer may seek additional information from the involved parties to make an informed decision

Mitigation & resolution

If a conflict of interest is deemed significant, steps will be taken to mitigate or eliminate the conflict. Mitigation measures may include modifying job responsibilities, recusal from certain decision-making processes, or divestment of conflicting interests.

The Directors and compliance officer will work with the affected individual to develop an appropriate resolution plan.



Whistleblowing policy

Ensuring accountability and transparency is essential to us. We want our employees and stakeholders to feel comfortable voicing concerns responsibly. Every employee is expected to serve the company faithfully and keep company matters confidential.

This policy empowers company employees to raise concerns internally and at a high level, disclosing information they believe indicates malpractice or misconduct.

Concerns may include

- Financial malpractice, fraud, or impropriety
- Non-compliance with legal obligations or statutes
- Risks to health, safety, or the environment
- Criminal activities
- Improper conduct or unethical behaviour
- Efforts to conceal any of the above.



Whistleblowing policy

Wavemaker group whistleblowing policy

Confidentiality:

We promise confidentiality to whistleblowers and safeguard their identity during investigations.

Non-Retaliation:

We strictly forbid retaliation against whistleblowers and will take disciplinary action against any such behaviour.

Impartial Investigation:

We commit to fair and unbiased investigations conducted by impartial parties.

False Allegations:

We take false accusations seriously and will address them appropriately.

Education:

We provide training to raise awareness about the whistleblowing process and its importance.

Continuous Improvement:

We regularly review and enhance our whistleblowing process based on feedback and best practices.

Legal Compliance:

Our process complies with all relevant laws and regulations.

This policy supports individuals who uncover wrongdoing. It doesn't question the Company's financial decisions, nor should it reopen matters already addressed through harassment, complaint, disciplinary, or other procedures.

Accessible Reporting Channels:

We offer various reporting channels, ensuring individuals can report concerns comfortably. All concerns can be reported by sending an e-mail to:
compliance@wavemakerhospitality.com

Documentation:

We document and report all concerns and investigations to relevant stakeholders.

Support:

We offer support and assistance to whistleblowers throughout the process, including counselling and legal advice



Acceptable gifts, hospitality & entertainment

To maintain the highest standards of ethical conduct, the following guidelines outline what constitutes acceptable gifts within the framework of our anti-bribery policy:

Nominal value

Acceptable gifts should have a nominal monetary value and should not be perceived as extravagant or inappropriate. Gifts of significant value may create the appearance of impropriety and should be declined.

For more info on complimentary procedures, please refer to the internal audit control manual.

Frequency

The frequency of gift-giving, as well as the timing, should be reasonable. Regular or frequent gift exchanges may raise concerns about undue influence or favouritism. It is acceptable to offer and receive gifts from any third party (non-company related) on important holidays or celebration not exceeding the value of EUR500.

Publicly disclosed

All gifts, regardless of value, should be appropriately documented and, if required, publicly disclosed. This includes internal records and, where necessary, disclosure to relevant authorities.

Compliance with local laws

Gifts should comply with applicable local laws and regulations. Our company will not engage in providing any gifts to any government authorities as this is legally prohibited.

Transparency

All arrangements for complimentary accommodation, food, and beverage should be transparent and well-documented. This includes clearly stating the purpose, duration, and nature of the hospitality.

Reasonable & proportional

The provision of complimentary services should be reasonable, proportional to the business relationship, and serve a legitimate business purpose. Excessive or lavish hospitality may create the appearance of impropriety and is not in line with our commitment to ethical conduct.

Acceptable gifts, hospitality & entertainment

Prior approval

Acceptable gifts should have a nominal monetary value and should not be perceived as extravagant or inappropriate. Gifts of significant value may create the appearance of impropriety and should be declined.

For more info on complimentary procedures, please refer to the internal audit control manual.

Disclosure & reporting

All instances of providing complimentary services should be appropriately documented and disclosed in relevant records. This includes internal documentation and, if necessary, disclosure to relevant authorities.

Compliance with local laws

Wavemaker Hospitality will ensure that all provisions of complimentary services comply with local laws and regulations.

Confidentiality

Confidential information

Includes, but is not limited to, the following:

- Business plans and strategies
- Financial information
- Intellectual property (patents, trademarks, copyrights)
- Customer and clients personal information
- Employee personal information
- Any proprietary or non-public information related to the business

Responsibilities

Employees:

All employees are responsible for safeguarding confidential information to which they have access. This responsibility extends to information about the company, its clients, and other employees.

Contractors and Representatives:

Contractors, consultants, and other representatives of [Company] must adhere to the same confidentiality standards as employees. They are required to sign confidentiality agreements as appropriate.

Use and disclosure

Limited Access:

Access to confidential information is granted on a need-to-know basis. Employees should only access and use confidential information necessary for the performance of their job duties.

Non-Disclosure Agreements:

When appropriate, employees, contractors, and representatives may be required to sign non-disclosure agreements to reinforce their commitment to confidentiality.

External Communication:

Employees must refrain from discussing confidential information in public spaces, on social media, or in any external communication without proper authorization.

Physical Security:

Physical documents containing confidential information should be stored securely, and access should be restricted and in accordance to the DPAM (Data protection management systems).

Digital Security:

Electronic files must be protected through secure passwords, encryption, and other appropriate security measures.



Confidentiality

Reporting & breach

Reporting:

Any suspected breach of confidentiality must be reported immediately to the [appropriate department or supervisor.

Consequences of Breach:

Breach of confidentiality may result in disciplinary action, including termination of employment or legal consequences.

Confidentiality beyond employment

The duty to maintain confidentiality extends beyond the termination of employment or contractual relationships. Former employees and representatives must continue to respect the confidentiality of information acquired during their association with Wavemaker Hospitality.

Training & awareness

Training:

Regular training sessions on confidentiality policies and procedures will be conducted to ensure that all individuals associated with [Company] remain informed and vigilant regarding their responsibilities.

Acknowledgment:

All employees and representatives are required to sign an acknowledgment form indicating their understanding of and commitment to this Confidentiality Policy. By adhering to these guidelines, we collectively contribute to maintaining the trust and integrity of Wavemaker Hospitality.

Company assets

Policy on Proper Use of Company Assets Purpose

The purpose of this policy is to define guidelines for the proper use of Wavemaker Hospitality assets to ensure their responsible and efficient utilization. Company assets include but are not limited to equipment, vehicles, technology, facilities, and any other resources provided for business purposes.

Responsibility

All employees, contractors, and representatives of Wavemaker Hospitality are responsible for the appropriate use and care of company assets. This responsibility extends to ensuring that assets are used for legitimate business purposes only.

Authorized Use

Company Business:
Company assets should be used exclusively for official business purposes to fulfil the objectives and goals of Wavemaker Hospitality.

Personal Use:
Limited and occasional personal use of company assets may be permitted, but it should not interfere with work responsibilities or violate any laws or policies. Personal use should not incur additional costs for the company

Information Technology Resources

Authorized Access:
Access to company computer systems, networks, and software should be limited to authorized individuals for legitimate business purposes.

Security Measures:
Employees must follow established security protocols, including password protection, to safeguard company information and prevent unauthorized access.

Company Vehicles:
Safe Operation: Company vehicles should be operated safely and in accordance with all applicable laws. Drivers must hold a valid and appropriate license.

Maintenance: Regular maintenance schedules for company vehicles must be adhered to, and any issues or concerns should be reported promptly.

Third-Party Usage:
Vendor or Contractor Usage:
Any third-party use of company assets by vendors or contractors must be authorized and closely monitored to ensure compliance with this policy and appropriate agreements must be signed.

Consequences of Violation:
Violations of this policy may result in disciplinary action, including but not limited to warnings, suspension, termination, and legal action, depending on the severity of the breach.

Company assets

Care & Maintenance

Responsibility:

Employees are expected to use company assets with care and diligence, taking measures to prevent damage, loss, or theft.

Training and Awareness:

Regular training sessions will be conducted to educate employees on the proper use of company assets and to ensure continued awareness of their responsibilities.

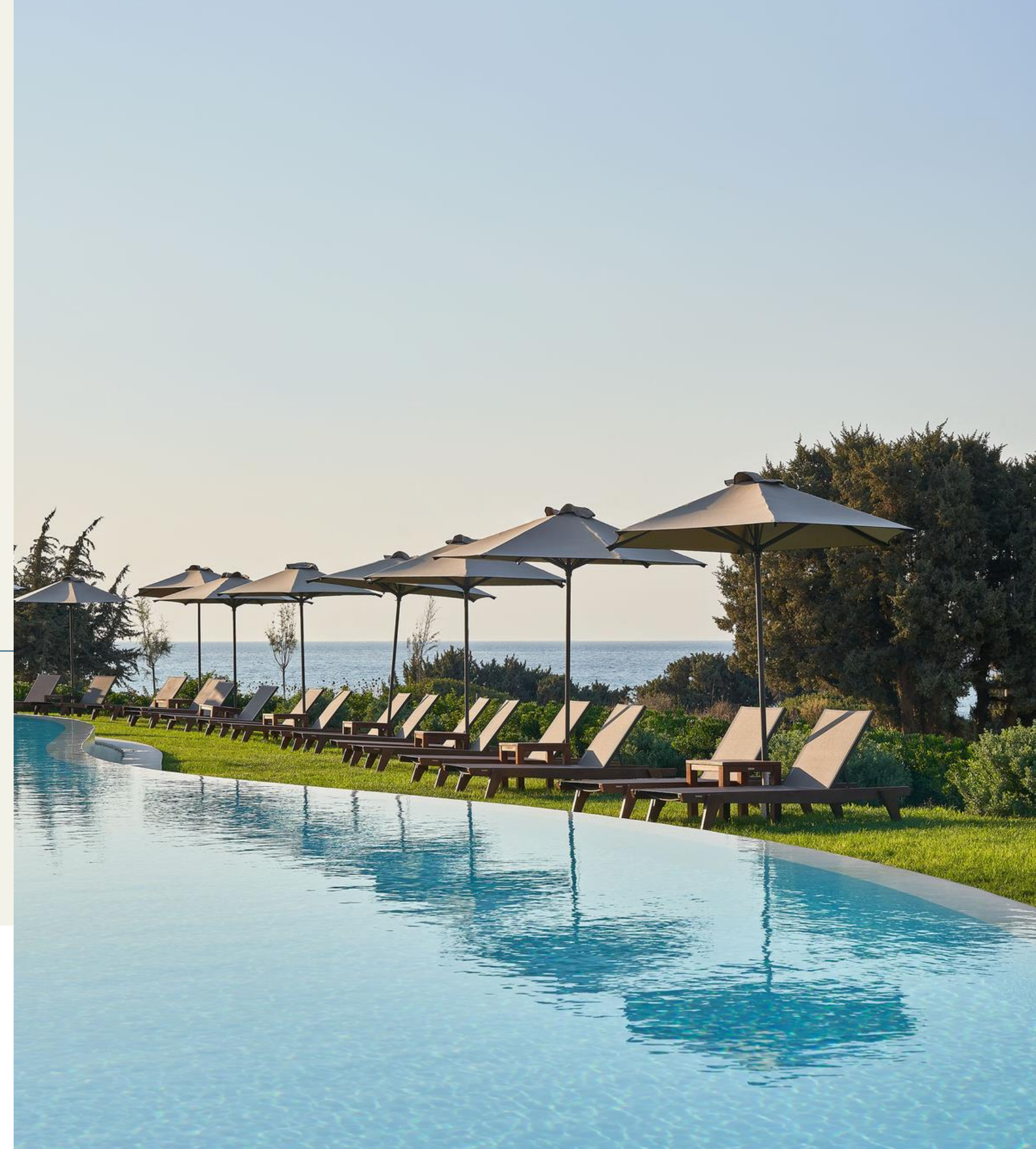
Reporting Damage or Loss:

Any damage, loss, or theft of company assets must be reported immediately to the relevant supervisor.

Acknowledgment:

All employees and representatives are required to sign an acknowledgment form indicating their understanding of and commitment to this Policy on Proper Use of Company Assets.

By adhering to these guidelines, we contribute to the responsible stewardship of company resources and the overall success of Wavemaker Hospitality.



4. Data protection

Data protection

At Wavemaker, we understand the significance of safeguarding personal information, and we take our responsibility seriously. In this context, we have implemented comprehensive data protection management system and measures to protect the confidentiality, integrity, and availability of the data we process.

For more detail, please refer to the company privacy policy and data protection management system.
<https://www.wavemaker.com/information/privacy-statement>

Privacy complains may be sent to:
privacy@wavemakerhospitality.com

KEY HIGHLIGHTS OF OUR DATA PROTECTION MEASURES →

Encryption protocols

Our systems have in place encryption protocols to secure data both in transit and at rest. This adds an extra layer of protection to mitigate the risk of data interception or unauthorized access.

Access controls

We have established strict access controls to ensure that only authorized individuals have access to the data. This helps prevent unauthorized disclosure or use of sensitive information.

Regular security audits

We aim to conduct periodical security audits to identify and address potential vulnerabilities in our systems. This proactive approach allows us to continuously improve our security posture and respond swiftly to emerging threats.

Data minimization

We adhere to the principle of data minimization, ensuring that we only collect and process the information necessary for the intended purpose. This helps reduce the risk associated with unnecessary data exposure.

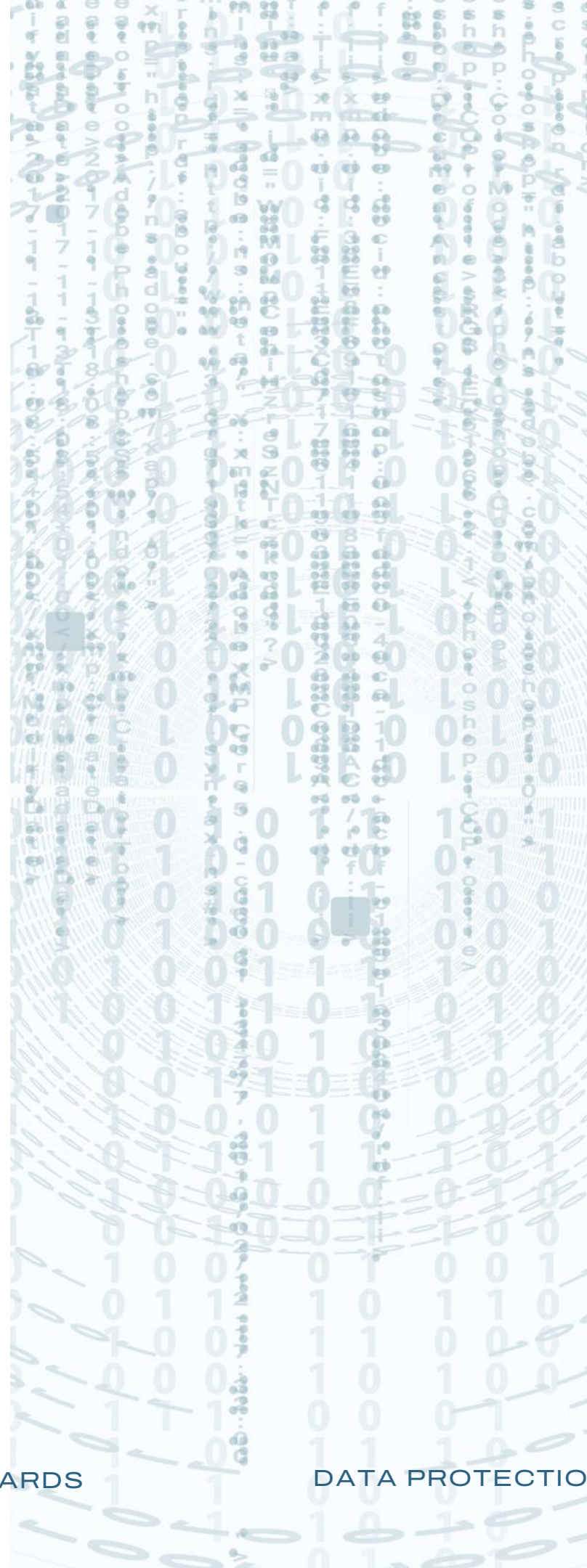
Incident response plan

In the unlikely event of a data breach, we have a well-defined incident response plan in place. This includes immediate notification to relevant parties, a thorough investigation, and the implementation of corrective measures to prevent future incidents.

Data protection

As part of our commitment to safeguarding sensitive information and maintaining a secure work environment, we would like to remind all employees of the importance of using electronic systems in accordance with our privacy and cybersecurity policies.

Protecting privacy



1 Respect for Privacy

We inform and encourage all our employees that all electronic systems, including computers, email, and other communication platforms, should be used with respect for the privacy of individuals and the confidentiality of company information.

2 Personal Information

Personal information of colleagues, clients, or any other individuals unless it is required for job-related tasks should not be stored on any personal devices. Such information should be handled in accordance with our privacy policies.

Data protection

Cybersecurity best practices

1 Password Security

The IT department will be sending automatic requested for use of strong passwords and regular change. Do not share passwords, and report any suspicion of unauthorised access immediately.

2 Email Security

Exercise caution with email attachments and links. Be aware of phishing attempts, and report suspicious emails to the IT department.

3 Software Updates

It is a standard for Wavemaker Hospitality to keep software, including antivirus programs, up to date. Regularly update your operating system and other applications to patch potential security vulnerabilities.

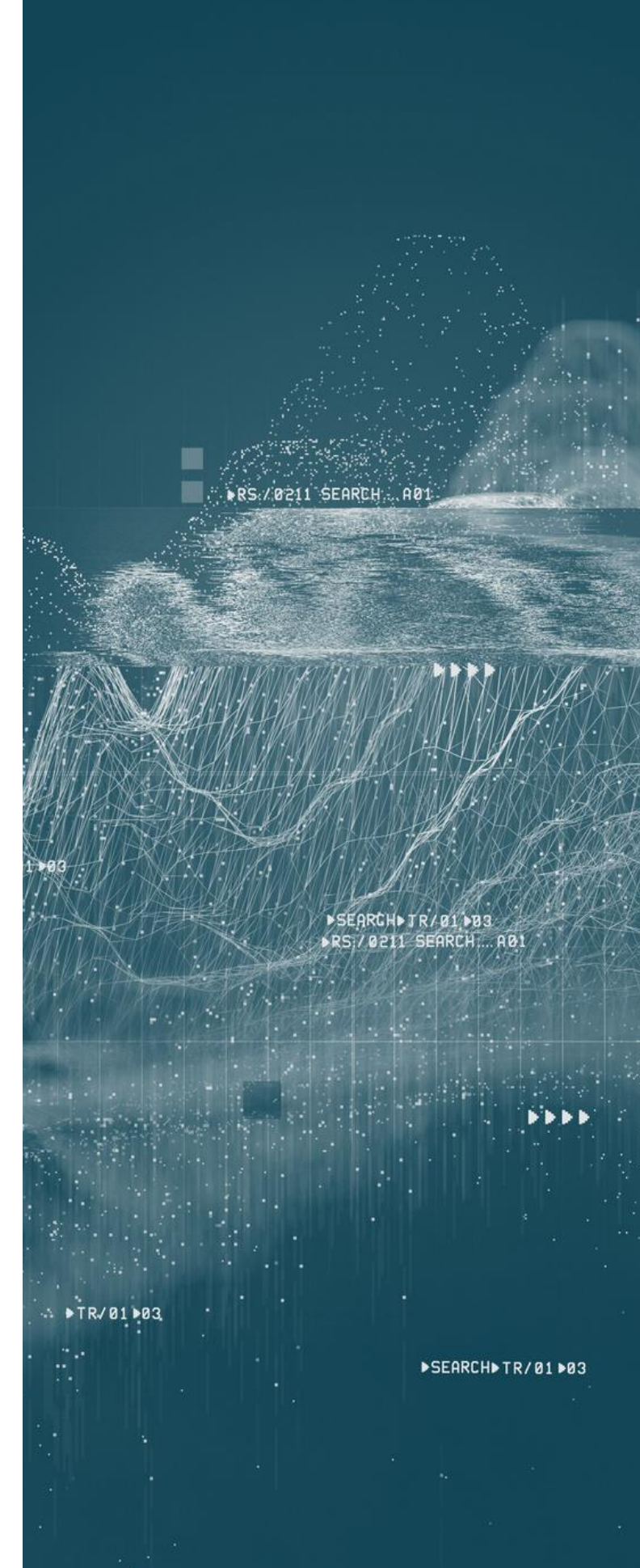
Data protection

4 Unauthorized Software

All employees are regularly reminded not to install unauthorized software on company devices. All software installations must be approved by the IT department.

5 Data Encryption

When handling sensitive information, ensure that it is transmitted and stored securely using encryption methods in line with privacy and cybersecurity policies.



Data protection

6 Remote Access

Employees are instructed and reminded to follow established protocols for secure remote access. Use virtual private networks (VPNs) and other secure connections when accessing company systems remotely.

7 Reporting Security Concerns

If you observe any suspicious activities or have concerns regarding cybersecurity, promptly report them to the IT department or your supervisor.

8 Periodic Audits

The company may conduct periodic audits to ensure compliance with privacy and cybersecurity policies. Your cooperation is essential in maintaining a secure work environment.

10 Acknowledgment

All employees are required to acknowledge their understanding and commitment to adhere to the company guidelines by signing the attached acknowledgment form.

By collectively adhering to these policies and best practices, we contribute to the overall cybersecurity and privacy of our organization.

9 Training Opportunities

We encourage all employees to take advantage of cybersecurity guidelines offered by the company to stay informed about the latest threats and best practices.

5. Making the right decisions

Decision making

? Does my decision align with legal requirements?

? Does it align with my personal values and instincts?

? Have I thoroughly assessed and considered potential risks associated with this decision?

? Am I confident that my decision won't lead to trust or reputational issues for the company?

? Have I evaluated the potential negative impact on both myself and Wavemaker Hospitality?

? Can I go to sleep at night without any concerns about the consequences of my choice?

? What are the potential risks to the company and colleagues based on my decision?

? How would I feel if the decision were publicly disclosed through the media?

? Would I be comfortable with others knowing about my actions or decision?

? What would a responsible individual think about my decision?

Is it consistent with the established company policies and procedures?

These questions serve as guiding indicators. A comprehensive response to each ensures a reliable path to a sound decision. Any negative response, uncertainty, or lack of clarity in a single question necessitates an immediate halt to the decision-making process.

In such instances, the matter should be promptly forwarded to the compliance officer within the Atlantica Hotels, for further assessment and guidance

6. Sustainability



Sustainable operations

OUR PROMISE

At the heart of our commitment to responsible business practices is our dedication to sustainable operations.

We recognize the significant impact our operations can have on the world around us. Therefore, our Code of Conduct and Code of Ethics emphasize our responsibility to conduct business in a manner that promotes environmental sustainability.

Sustainable operations, as outlined in our processes and procedures, encompass a range of practices aimed at minimizing our ecological footprint.

REDUCING WASTE

PROMOTING ENERGY EFFICIENCY

CONSERVING RESOURCES

PRIORITIZING ENVIRONMENTALLY FRIENDLY PRACTICES



Sustainable operations

Our commitment to sustainable operations is not just a moral obligation but a strategic imperative.

By integrating sustainability into our daily operations, we not only contribute to the well-being of our planet but also position the Atlantica Hotels & Resorts as a leader in socially responsible business.

We urge each team member to familiarize themselves with the specific guidelines outlined in our the company's procedures regarding sustainable operations.

Let us collectively work towards a future where our business practices not only meet the needs of the present but also ensure a sustainable legacy for generations to come.

7. Donations & employees benefits

Donations

We aim to support organizations and initiatives that align with our company values and contribute to the well-being of society.

Donations may be directed towards charitable, educational, environmental, or community-based causes.

Eligibility criteria

Organizations seeking donations must be registered as non-profits or have a verified charitable status.

Priority will be given to initiatives that have a direct and measurable impact on the community.



Types of donations

Wavemaker Hospitality:
May provide financial contributions, in-kind donations, or volunteer support, depending on the nature of the initiative.

Employee Involvement:
We encourage employees to suggest and participate in charitable activities.

Application Process:
Organizations seeking donations should submit a formal request through designated channels and sustainability department, by sending an e-mail to: s.saler@wavemakerhospitality.com

The request should include details about the initiative, its impact, and how the funds will be utilized.

Donations

Evaluation & approval

Donation requests will be reviewed by our Chief Sustainability Officers.

Approved donations will be communicated to the requesting organization in a timely manner.

Contact information

By adhering to this donation policy, Wavemaker Hospitality aims to contribute meaningfully to the well-being of society and create a positive impact on the communities we serve.

Financial transparency

Wavemaker Hospitality:
Is committed to transparency in our charitable activities. Financial information related to donations will be made available upon request

Reporting & Impact Assessment:
Organizations that receive donations will be required to provide periodic updates on the progress and impact of the funded initiatives.

Review & Revision:
This policy will be periodically reviewed to ensure alignment with company values and evolving community needs.

OLUNTEER



Benefit programmes

Where applicable and required, we comply with local regulations on employees benefits, a fund is available and where required financed, which is furthermore used for employees chosen activities.

01 **Financial wellbeing**

Competitive salary packages to recognize and reward your contributions. As part of our commitment to providing a conducive working environment, we may be offering certain company assets as a valuable benefit for employees use.

02 **Career development**

Professional development opportunities, including workshops, training programs, and tuition reimbursement. Clear paths for career advancement and mentorship programs to support your growth.

03 **Recongition & awards**

Employee recognition programs to acknowledge your achievements and dedication. Performance-based bonuses and incentives to celebrate your contributions to our success.

04 **Family-friendly policies**

Parental leave and flexible scheduling options, strictly following local legislations, to support employees in their various life stages.

Benefit programmes

05

Community involvement

Paid time off for volunteering and opportunities to engage in corporate social responsibility initiatives.
Company-sponsored community events and partnerships with charitable organizations.

06

Communication & transparency

Regular communication about benefit updates and changes to keep you informed. Transparent information on the value and utilization of each benefit offered.

07

Employee feedback

We value our employees feedback.
Open communication channels are in place to gather your insights and suggestions for continuous improvement.

8. Rights & freedom

Fostering a workplace culture that values diversity, inclusion, and mutual respect

Discrimination & harassment

Wavemaker Hospitality is committed to maintaining a workplace free from discrimination and harassment. The company maintains the procedures to be followed in addressing any concerns related to discrimination or harassment.

Definition

Discrimination involves treating an individual unfavourably due to their race, colour, religion, sex, national origin, age, disability, or any other protected status under applicable laws.

Harassment includes any unwelcome conduct, comments, or behaviour based on race, colour, religion, sex, national origin, age, disability, or other protected status that creates a hostile or intimidating work environment.

Reporting procedures

Reporting Discrimination or Harassment:
We encourage any employee who believes they have experienced or witnessed discrimination or harassment should report the incident promptly to their supervisor, manager, or send an e-mail to compliance@wavemakerhospitality.com



Discrimination & harassment

Alternative reporting channels

Employees who are uncomfortable reporting to their immediate supervisor or manager may use alternative channels, such as contacting a higher-level manager.

Training & prevention

The discrimination guidelines are provided to all employees via employees handbook.

Periodic review

All Discrimination and Harassment policies and procedure will be periodically reviewed and updated to ensure its effectiveness in maintaining a workplace free from discrimination and harassment.

Confidentiality & non-retaliation

All reports of discrimination or harassment will be independently investigated and treated with the utmost confidentiality to the extent permitted by law. Information will only be disclosed to those involved in the investigation and as necessary for resolution.

Retaliation against any individual who reports discrimination or harassment, or who participates in an investigation, is strictly prohibited. Atlantica Hotels & Resorts is committed to protecting individuals from retaliation.

All employees are informed on this process via employees handbook provided during orientation and hiring.

Acknowledgment

For more details on harassment and discrimination, please refer to the Internal company procedure Disciplinary & Harassment procedure which is also part of the employees handbook.

All employees are required to sign an acknowledgment form indicating their understanding of and commitment to this Discrimination and Harassment Procedures, via employees hand books.

By adhering to these procedures, we reinforce our commitment to fostering a workplace culture that values diversity, inclusion, and mutual respect.

8. Employment

Labour & human rights

Labour

We are unwavering in our commitment to strict compliance with employment and labour laws and regulations.

Human rights

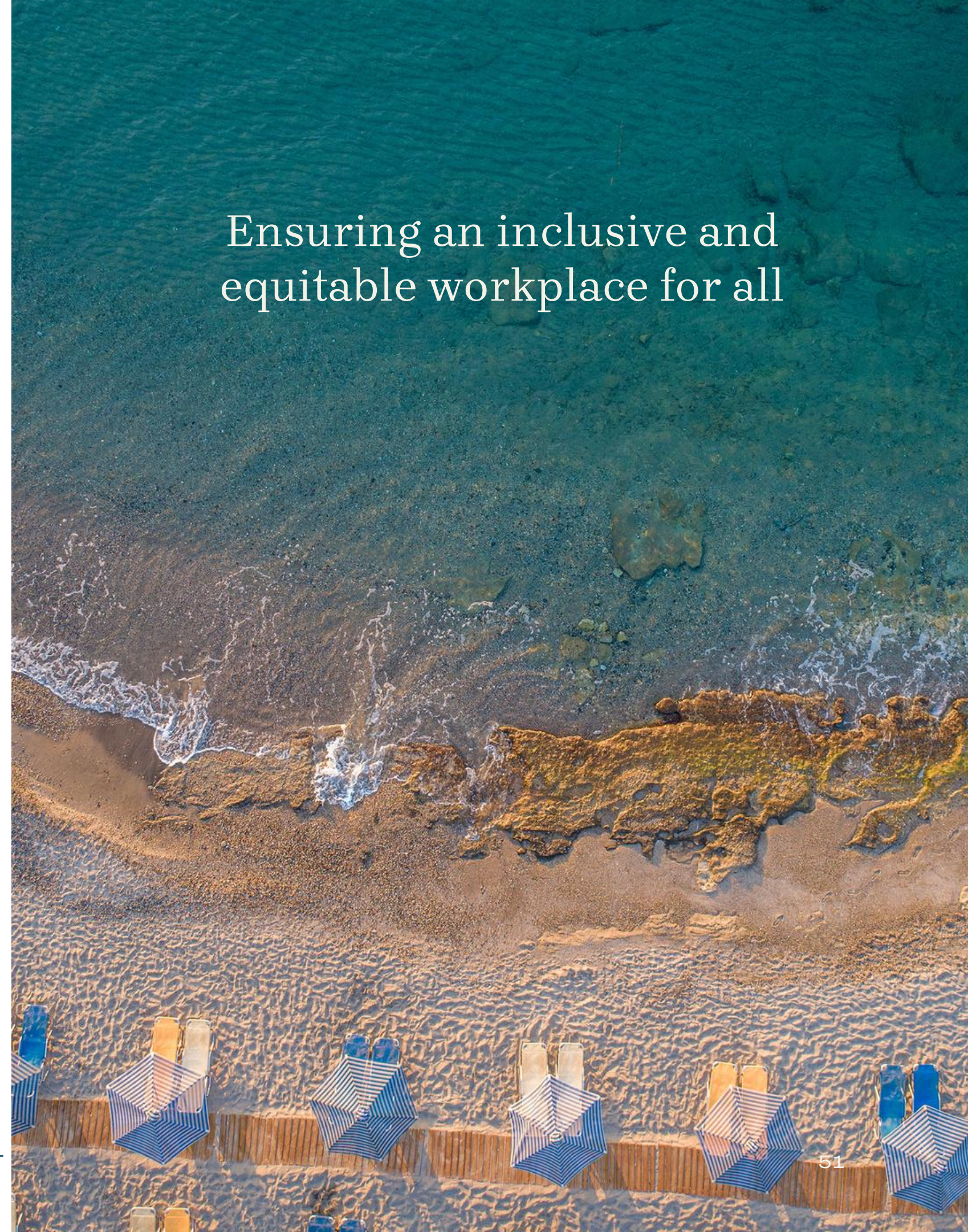
Wavemaker Hospitality is deeply committed to upholding and respecting internationally recognized human rights, always opposing any involvement in human rights abuses.

Our establishments are devoted to promoting the freedom of association and the effective recognition of the right to collective bargaining.

We persistently strive to eliminate all instances of forced and compulsory labour. It is our unwavering corporate policy to refrain from employing children, and we eagerly endorse the elimination of any form of child labour.

We adamantly reject discrimination in employment and occupation, racial and religious discrimination, ensuring an inclusive and equitable workplace for all.

Ensuring an inclusive and equitable workplace for all



10. Safe leisure & workplace

Health, safety & wellness

Wavemaker Hospitality is committed to providing a safe and healthy work environment for all employees.

Responsibilities

1 Management

Management is responsible for implementing and maintaining health and safety policies, conducting risk assessments, and ensuring compliance with relevant regulations.

2 Employees

All employees are responsible for following health and safety procedures, reporting hazards, and taking reasonable care to protect their own and others' health and safety.

3 General

HSE implementation is a legal obligation and it is mandatory that all Atlantica Hotels & Resorts and its associates adhere to the HSE processes and procedures and legal requirements and as per active HSE Management systems.

Health, safety & wellness

Reporting and overall management of safety & health

1 Immediate reporting

Employees must report any hazards, unsafe conditions, or incidents immediately to their supervisor or [Health and Safety Officer(where available as per local laws)].

2 HSE teams

Each Wavemaker entity maintains HSE& Emergency Teams, where all health, safety, wellness and emergency subjects /matter/ issues are discussed and resolved. An appropriate meeting minutes are kept and all action items recorded and duties are clearly defined.

Wavemaker Hospitality maintains occupational health and safety management system, according to the ISO 45001 and it is mandatory that all Atlantica entities adhere to these policies, processes and procedures.

Health, safety & wellness

Training

1 Initial training

All new employees will receive training on health and safety procedures during their orientation.

2 Ongoing training

Regular training sessions will be conducted to update employees on new safety procedures, equipment, and best practices

3 General

All regulatory trainings will be carried out and audited by the relevant teams (First Aid/AED, life guard, HSE teams and HSE Team leaders/officers trainings)

Legal compliance- useful links

[Cyprus Law](#)

[Cyprus Hotel Association](#)

[E-nomothesia](#)

[Elinyae](#)

[The ministry of environment and energy](#)

11. Compliance with code of conducts and ethics



Compliance with this document

The Chief Sustainability & Compliance Officer plays a pivotal role in overseeing the adherence to our Code of Conduct and Code of Ethics. While their leadership ensures the alignment of our practices with these standards, the ultimate responsibility for compliance lies with each and every one of us.

In addition to the broader compliance perspective, our Chief Compliance Officer is specifically tasked with ensuring that all our hotels comply with relevant industry legislations.

Their commitment extends to assisting every employee, addressing queries related to this document, and providing guidance on any legal requirements pertinent to the hospitality industry.

In essence, while our officers provide strategic guidance, it is the personal commitment of each team member that collectively reinforces the ethical and compliant foundation of our operations.

Let us all actively engage with these guidelines, ensuring we not only meet industry standards but exceed them, embodying the principles of integrity and responsibility in all that we do.

Thank you for your commitment to upholding our standards and contributing to a culture of excellence and compliance at Atlantica Hotels & Resorts.

12. Updates

Acknowledgement & acceptance

This document undergoes an annual review to ensure its relevance and effectiveness. Updates are made as necessary to reflect any changes in industry standards, regulations, or our organizational practices.

I confirm receipt and acknowledge awareness of Wavemaker Hospitality
Code Conducts & Business Ethical Standards

Date: _____

By: _____

Employee's Signature

Printed Name & Surname

COMMUNICATION

FOR MORE INFO, PLEASE CONTACT:

SANJA SALER
CHIEF SUSTINABILITY & COMPLIANCE OFFICER | DPO
S.SALER@WAVEMAKERHOSPITALITY.COM

OUR COMPANY POLICIES

[HTTPS://WWW.WAVEMAKERHOSPITALITY.COM/
INFORMATION/SUSTAINABILITY/POLICIES](https://www.wavemakerhospitality.com/information/sustainability/policies)

WWW.WAVEMAKERHOSPITALITY.COM