

PPHE HOTEL GROUP SUPPLIER CODE OF CONDUCT

March 2026

Products, services and activities of our Suppliers may impact the reputation of PPHE Hotel Group. We have devised this document to lay out the minimum criteria for our supply chain. Suppliers shall comply with the standards listed here and with all applicable laws and regulations, requesting the same from their supply chain, including third-party labour agencies. Failure to follow the Supplier Code of Conduct could result in termination as a PPHE Hotel Group supplier.

PPHE Hotel Group is not a joint or co-employer with any of its Suppliers, each of whom is the sole employer of its employees, making it fully and completely responsible for any of its employment-related decisions as well as compliance with all applicable laws, rules and regulations in the operation of its business.

PPHE HOTEL GROUP PRINCIPLES OF SUPPLY CHAIN MANAGEMENT

PPHE Hotel Group believes in and is committed to advancing the [United Nations Global Compact's](#) universally accepted principles in the areas of human rights, labour, environment, and anti-corruption, as well as the [17 Sustainable Development Goals](#).

We support the articles contained in the Universal Declaration of Human Rights and we are committed to combatting modern slavery, educating employees and encouraging our partners as part of the broader business community to take a stand against human trafficking.

In line with its ESG objectives, PPHE Hotel Group promotes water stewardship and the biodiversity protection. All PPHE Hotel Group Suppliers shall work with honesty and integrity according to these standards.

In addition, PPHE Hotel Group Suppliers are expected to comply with the terms and conditions of their supplier agreements, as well as all applicable laws and regulations in the countries and jurisdictions where they conduct business or deliver goods and/or services.

The above principles are the foundation for the Supplier Code of Conduct, which outlines the minimum standards that Suppliers to PPHE Hotel Group are expected to achieve.

PPHE Hotel Group's ESG strategy includes an objective to work with Suppliers that demonstrate social, ethical and environmental responsibility. In order to achieve this objective, all our Suppliers should comply with the criteria listed in the following pages as a condition of doing business with PPHE Hotel Group.

1. HUMAN RIGHTS

PPHE Hotel Group Suppliers shall not violate the principles contained in the [United Nations Declaration of Human Rights](#).

NO CHILD LABOUR

Suppliers shall not use any form of child labour, as defined by [Principle Five](#) of the UN Global Compact, in any of their facilities.

Children should be protected from any type of labour that may be hazardous to their health or that interferes with their education.

Suppliers shall adhere to minimum age provisions as applicable by local laws and regulations, or the [ILO convention No. 138](#) whichever is higher, and should not use workers under the legal age for employment for the type of work being performed in any facility.

COMBATING HUMAN TRAFFICKING AND SLAVERY

Suppliers should not allow any form of modern slavery, human trafficking, exploitation of children, or forced or compulsory labour.

All work must be voluntary, and in no case should workers be mandated to relinquish government issued identification, passports or work permits.

Suppliers should ensure that the [Employer Pays Principle](#) is applied and that workers are not required to pay any recruitment fees or expenses as a condition of receiving work.

In cases where modern slavery, human trafficking, exploitation of children, or forced and compulsory labour is discovered in the supply chain, it must be reported to PPHE Hotel Group without delay.

WORK HOURS AND CONDITIONS

Suppliers should ensure and document that workers have reasonable daily and weekly work schedules, regulated by local laws.

Workers should not be required to work more than the number of hours legally allowed for regular and overtime work periods.

Suppliers shall comply with local laws and industry standards regarding payment, working hours (including overtime), rest days and public holidays.

Suppliers shall compensate workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers

will not permit deductions from wages as a disciplinary measure. Suppliers should be able to provide relevant documentation.

FREEDOM OF ASSOCIATION

Suppliers should allow employees the right to freely associate, organise and to bargain collectively in accordance with applicable law.

NO HARASSMENT, HARSH OR INHUMANE TREATMENT

PPHE Hotel Group Suppliers must treat all workers with dignity and respect. They must ensure that no threats of violence, physical punishment, confinement, or other forms of physical or psychological abuse are used as a method of discipline or control. Suppliers will clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements.

At PPHE Hotel Group we are committed to taking proactive measures to prevent all forms of bullying and harassment including sexual harassment against any of our workers. We expect all Suppliers and partners to uphold this same standard.

We operate a zero-tolerance policy for any harassment carried out by a third party, such as suppliers, guests, customers, contractors, or anyone else using our services or accessing our premises.

NON-DISCRIMINATION

There shall be no positive or negative discrimination in the Supplier's workplace or hiring policy due to race, gender, age, disability, marital status, sexual orientation, pregnancy, nationality, caste, national origin, veteran status, minority group, affiliation with a political, religious or union organisation or any other characteristic protected by law.

2. HEALTH AND SAFETY

Suppliers' production and associated services shall comply with workers' health and safety regulations, human rights guidelines, and environmental protection laws in the country of production in line with the [International Labour Organisation](#).

Facilities where goods are produced for PPHE Hotel Group should provide a safe work environment and healthy working conditions for all workers. This includes access to drinkable water, sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, and safeguarding against occupational injury and illness. Facilities should be subject to regular health and safety reviews, with corrective action being taken where necessary.

Where the Supplier provides housing, it must also adhere to the above requirements.

3. PRIVACY AND INFORMATION SECURITY

PPHE Hotel Group requires its Suppliers to protect the privacy of individuals (employees, guests, visitors, etc.) and the security of their personal information. Suppliers must design and maintain processes to provide appropriate safeguards when processing this information in compliance with all applicable local laws. Personal information provided by or on behalf of PPHE Hotel Group should only be used, accessed, and disclosed as permitted by the Supplier agreement.

4. FAIR COMPETITION AND ANTI-CORRUPTION

Suppliers shall comply with legal requirements regarding fair competition and accurate marketing. They shall act confidentially, lawfully, and with integrity when handling competitive and proprietary information.

Suppliers will perform all business dealings with integrity and transparency, and these dealings will be reflected accurately in the Suppliers' annual reports and record keeping.

PPHE Hotel Group is committed to ethical business practices and compliance with all applicable Anti-Bribery and Anti-Corruption (ABAC) laws worldwide. PPHE Hotel Group prohibits the offering or provision of money or anything else of value, directly or indirectly, to any person for the purpose of influencing the exercise of his or her official duties in a manner that would benefit PPHE Hotel Group. PPHE Hotel Group maintains Responsible Business Policies to ensure we act ethically and to prevent financial crimes such as fraud, the facilitation of tax evasion, bribery and corruption. These Responsible Business Policies set out rules and procedures to ensure we do not engage in bribery or other corrupt practices. In addition to ensuring controls to prevent bribery and corruption, our Policies exist to prevent the facilitation of tax evasion by any third party and to prevent fraud.

PPHE Hotel Group also expects its Suppliers to adhere to the same commitment to ethical practices and compliance with ABAC Laws in the conduct of their respective businesses, particularly, but not limited to, when providing goods and/or services to PPHE Hotel Group. In particular, transactions between Suppliers and PPHE Hotel Group must be documented in such a way as to adhere to recognised accounting practices and act to ensure compliance with relevant taxation regimes. Suppliers must have controls in place to prevent fraud, particularly when providing goods or services to PPHE Hotel Group.

PPHE Hotel Group Suppliers must also adhere to the highest standard of moral and ethical conduct, respect all local laws, and not engage in any other form of illegal or improper practices (such as extortion, fraud, or any other act which could enable corruption in any manner).

Suppliers will not make illegal payments themselves or through a third party. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

Suppliers should ensure that acceptance of any business courtesies, gifts, entertainment, merchandise, services, travel, donations or anything of value to or from PPHE Hotel Group employees is proper and could not reasonably be construed as an attempt by the offering party to secure favourable treatment, or as a means of obtaining, an improper business advantage.

Suppliers are advised that employees of PPHE Hotel Group cannot engage in any behaviour that could impact their judgement regarding the best interest of the company or their ability to give full attention to PPHE Hotel Group business. This includes, but is not limited to, accepting personal gifts or entertainment that have a substantial monetary value or include any personal kickback arrangement. Employees may not accept gifts of money under any circumstances, nor may they solicit non-monetary gifts or any other personal benefit or favour of any kind from Suppliers.

5. ENVIRONMENTAL SUSTAINABILITY

GENERAL

Mandatory criteria

- Comply with existing legislation and regulations regarding the protection of the environment;
- Provide PPHE Hotel Group with information about their environmental initiatives upon request.

Desirable criteria

- Have a program in place to continuously minimise any negative environmental impacts of the full product/service life cycle.

CARBON MANAGEMENT AND EMISSIONS

Desirable criteria

- Provide PPHE Hotel Group with details on the carbon footprint per unit of product/service supplied on a yearly basis;
- Have a plan to reduce the carbon footprint of the product/service supplied and share details of this plan with PPHE Hotel Group (e.g., commitment to the Science-Based Target initiative).

WATER AND BIODIVERSITY STEWARDSHIP

Mandatory criteria

- Monitor water consumption across the Supplier's operations.

Desirable criteria

- Have technologies and initiatives in place to minimise water consumption (e.g., low flow taps);
- Provide PPHE Hotel Group with information regarding water consumption and any biodiversity support upon request.

WASTE MANAGEMENT

Mandatory criteria

- Allowing for appropriate waste segregation and disposal on the Supplier's premises (e.g., dry mixed recycling, food waste, etc);
- Provide PPHE Hotel Group with information regarding the Supplier's waste management practices upon request.

Desirable criteria

- Measure the amount of waste generated throughout the Supplier's operations and have a programme to reduce it (e.g. by limiting the packaging used);
- Where packaging is required, it is desirable for this to be reusable or recyclable and, wherever possible, Suppliers should avoid single use plastics;
- Provide PPHE Hotel Group with information regarding the waste generated by the Supplier upon request.

HAZARDOUS MATERIALS AND RESTRICTED SUBSTANCES

Mandatory criteria

- Comply with existing legislation and regulations regarding the hazardous materials and restricted substances.
- Identify and manage hazardous materials to ensure their safe handling, storage, recycling, reuse or disposal in such a way as not to harm the environment.

Desirable criteria

- Minimise the use of hazardous materials and restricted substances, for example by prioritising eco-labelled products;
- Provide PPHE Hotel Group with information regarding the hazardous materials and restricted substances used by the Supplier upon request;
- Do not use inputs derived from endangered animal or plant species as listed by CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora).

6. REPORTING VIOLATIONS

Suppliers agree to notify their employees and any sub-contractors that they should report concerns about possible breaches of this Supplier Code of Conduct.

Any stakeholder with concerns about the Supplier Code of Conduct and its implementation is encouraged to work directly with the Supplier or their primary PPHE Hotel Group contact to resolve those concerns.

Should that not be possible or appropriate, please contact Francois Chapoulet at fchapoulet@pphe.com (PPHE Hotel Group Senior Vice President of Procurement).

Should PPHE Hotel Group receive any report of possible breaches, the Supplier will be asked to comment and, if necessary, PPHE Hotel Group may request an improvement plan to correct the issue.

Should the Supplier not respond to these concerns and/or not be willing to correct the issue, they can be subjected to disciplinary actions, including termination as a PPHE Hotel Group Supplier and/or review by local authorities.

PPHE Hotel Group will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behaviour or a possible violation of this Supplier Code of Conduct.