

CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY OF HOTEL INVESTMENT PARTNERS, S.A.U.

Version 1.0.

HOTEL INVESTMENT PARTNERS, S.A.U., founded in 2015, expresses its commitment to comply with applicable criminal law.

HOTEL INVESTMENT PARTNERS, S.A.U., develops its activity concerned about regulatory compliance in the business services sector and based on this, makes the decision to implement a Criminal Compliance Management System and an Anti-Bribery Management System in accordance with the requirements established in the UNE 19601 and UNE-ISO 37001 standards, respectively.

The activity of **HOTEL INVESTMENT PARTNERS, S.A.U.** consists of the acquisition, promotion, development and exploitation of real estate assets for hotel and similar uses and, where appropriate, the hotel activity itself.

For all these reasons, **HOTEL INVESTMENT PARTNERS, S.A.U.** requires all its Collaborators to comply with the legal system and the prohibition of committing criminal acts, with special reference to the prohibition of bribery.

The materialization of this commitment must be based on:

- A strong culture of regulatory compliance.
- Mitigation of criminal risks through controls.
- Involvement of the culture of compliance by all the parties that participate in the development of the activity of **HOTEL INVESTMENT PARTNERS, S.A.U.**, (Company, Clients and Suppliers).

HOTEL INVESTMENT PARTNERS, S.A.U., always carries out its activities in such a way as to minimize criminal risk.

For all these reasons, the Management of **HOTEL INVESTMENT PARTNERS, S.A.U.**, undertakes to comply with all the requirements determined in the Criminal Compliance Management System and in the Anti-Bribery Management System, including this policy, as well as to carry out continuous improvement actions on the same.

All the personnel of **HOTEL INVESTMENT PARTNERS, S.A.U.**, have the obligation to communicate through the channels determined for this purpose, the potential criminal risks or non-compliance with regulations, without any retaliation being taken against the notifier. In case of non-compliance by the members of the organization with this compliance policy or with the Criminal Compliance Management System or the Anti-Bribery Management System, there will be disciplinary consequences. Likewise, the immediate report of significant issues in matters of criminal compliance is encouraged.

The implementation and maintenance of the Criminal Compliance Management System and the Anti-Bribery Management System corresponds to the Chief Compliance Officer, who has full authority, independence, and autonomy to make decisions regarding each of the systems.

In Barcelona, 14 November 2022.

Mr. Alejandro Hernández-Puértolas Pavia

President of the Board of Directors