



Business Code of Conduct

Minor Hotels and its affiliates conduct business with uncompromising ethical standards, expecting every employee to follow and promote high ethical standards and behaviour, respect local laws, and not engage in any form of corrupt practice, including but not limited to extortion, fraud or bribery. Employees must avoid seeking loopholes, shortcuts or technicalities, and reject the notion that unethical behaviour is acceptable because “everyone does it”. Failure to live up to the Company’s ethical standards will be subject to disciplinary action including, where appropriate, termination. In order for the Company to conduct business with high ethical standards, every employee will:

1. **Obey all relevant laws and regulations**, including those that apply to alcohol, antitrust, campaign finance, civil rights, copyright protection (includes printed matters and software), environmental protection, foreign corrupt practice, securities, taxes and computer crime.
2. **Treat all employees fairly, with dignity and with respect.** All employees are entitled to a work environment free from verbal, physical and sexual harassment.
3. **Report financial conditions and results of operations fairly and honestly.** The Company will keep its books and records according to generally accepted accounting principles, and with established finance and accounting policies. Employees will cooperate fully with internal and outside auditors during examinations of the Company’s books, records and operations.
4. **Deal honestly and fairly with clients, customers, suppliers and other stakeholders.** While the law requires that we obey the letter of all written contracts and agreements, we will also try to uphold the spirit of all business arrangements.
5. **Avoid conflicts of interest.** Any employee having any interest, direct or indirect, in any supplier, customer, competitor or franchise of the Company should make prompt disclosure to the Company, and obtain approval from the appropriate authority to continue the relationship. Management and employees shall not offer their skills or services to competitors, or engage in outside business that competes with or sells goods or services to the Company. Employing immediate family members in direct supervisor / subordinate relationships is to be avoided.
6. **Avoid receiving gifts, money and/or additional bonus payments from Business Owners / Owing Companies of Minor Hotels properties.** No employee should request or accept gifts, money and/or additional bonus payments for personal benefit in connection with their work for Minor Hotels and the Owing Companies of managed properties. This must be strictly adhered to. If in doubt, please put your query in writing to your direct manager. Whilst we encourage good owner relationships, no further salary payment, annual bonus payment or ex-gratia payment, other than those contracted and endorsed by Minor Hotels executives, or luxury gifts from owners must be accepted.

7. **Avoid improper giving and receiving of gifts from suppliers.** No employee will accept gifts, money or kickbacks which have been offered to induce the Company to purchase goods or services of soliciting companies. No employee shall contact any supplier of the company to request supply of products or services for free or at a special rate, without prior written authorisation by the appropriate authority.
8. **Not engage in any employment, contract or work with any company** while still being employees of the Company.
9. **Safeguard the Company's assets.** Personal use of supplies, equipment or premises belonging to the Company or its clients is prohibited, unless the appropriate authority gives prior permission and arranges adequate compensation. Every employee is responsible for safeguarding Company assets under the associate's control.
10. **Honour property rights, including copyrights and patents.** Unauthorised use of copyrighted materials and software is prohibited. Use of computer software for daily work must be in accordance with the Company's policies and procedures. Copies of software can be made only with proper authorisation.
11. **Honour confidentiality.** Disclosure of confidential matters of the Company, customers, contractors, suppliers or our business partners to other parties is prohibited, unless employees are discharged from such obligation by requirement of the law.
12. **Prohibit insider information in securities trading.** Trading of securities and/or property based on knowledge that comes from an employee's job within the Company, if that information has not yet been publicly released, is against the law and is prohibited.
13. **Separate personal political activities from the Company's business.** Employees shall not make political contributions using Company funds or take public positions on behalf of the Company without obtaining approval from the appropriate authority.
14. **Report violations.** Employees are encouraged to report known violations or unethical activities to their supervisors, the Law Department, or senior management of the company at any time. The Company will honour all requests confidentially.
15. **Engage in computer crime.** The Company reserves the right to provide and install computer programmes deemed to fit each employee's nature of work. Employees shall not modify or change any configuration of a computer's system without prior approval from authorised persons, and shall not directly or indirectly cause damage to the Company or other persons, or offend social ethics through the computer system through, for example, storing, forwarding, accessing personal data / information, or immoral media.
16. **Use social media responsibly.** The company understands that many employees make use of social media in a personal capacity. While they are not officially acting on behalf of the brand / property, employees must be aware that they are ambassadors of the brand / property at all times, and that they can damage their reputation if they are recognised as being one of their employees. Employees are allowed to say that they work for the brand / property, however, the employee's online profile may not include the brand / property name as an identifier (i.e. use of a brand / property as part of the name of a blog or a Facebook unique identifier).

When employees are posting, they should not:

- Bring the brand / property into dispute, for example by:
 - Criticising or arguing with guests of a property, colleagues, competitors, or a general audience with regards to the brand / property;
 - Make defamatory comments about individuals, companies, or groups related to the brand / property;
 - Post images related to the brand / property that are inappropriate, or links to inappropriate content.

- Breach confidentiality, for example by:
 - Revealing private / confidential information owned by the brand / property.

- If the employee uses the brand / property name while using social media, the employee may not breach copyright, for example by:
 - Using someone else's images or written content as described herein;
 - Using content that belongs to the property, either provided by MarCom or taken directly at the property by team members without prior permission;
 - When external content is used, explicit authorisation should be granted and/or credits should be properly included, acknowledging the content is not original from the property;

- If the employee uses the brand / property name while using social media, the employee may not do something that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:
 - Making offensive or derogatory comments relating to sex, gender, race, religion, disability, sexual orientation or belief;
 - Using social media channels to post content that is discriminatory or offensive.

The following terms of use should be respected at all times by employees with regards to social media:

- Post only approved content regarding the brand / property name. Have a method in place to ensure only approved content is posted;
 - Follow corporate social media usage guidelines regarding the brand / property name;
 - Do not use personal social media sites or related messaging services during business hours;
 - For any incorrect usage of social media sites, the user will be notified and face disciplinary action.
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