



# Code of Ethics and Conduct

Make it part of your daily actions.

## Message from our President:

With more than 30 years of experience, we are the leading company in the hotel industry. We have achieved growth and evolution through innovation and the incorporation of international brands in key destinations, with a multicultural and diverse environment where communication and ethics are the combination for the proper functioning of our operation.

We know that successful companies are those that integrate ethics into their culture, strategy, and daily practices. For this reason, it is essential to have our commitments as a business and as associates perfectly defined. We must all follow the PAM Hotels' Code of Ethics regardless of the position or job we hold.

I am very pleased to be able to present our PAM Hotels' Code of Ethics, which will serve as a compass for the performance of our daily activities in the company.

As we develop around the world, we want to continue to promote the highest standards of corporate ethics and integrity, sharing our values and organizational culture with our people and associates, with the future interests of PAM Hotels at heart.

The PAM Hotels' Code of Ethics is our main reference document, which must be applied in our daily professional life and responds to the situations and questions we may face. I invite you to get to know our Code of Ethics and make it part of your daily actions.

Sincerely yours,

**Roberto Chapur Zahoul**

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## Table of Contents

Message from our President..... 2

Introduction to our Code of Ethics and Conduct..... 6

Who must comply with our Code of Ethics and Conduct?..... 8

Mission..... 9

Vision..... 9

The values that guide us..... 9

A culture of compliance..... 10

### Integrity in our way of doing business

Our commitment to quality and hospitality..... 12

Corruption and bribery..... 15

Gifts and hospitality..... 16

Accurate accounting records ..... 17

Responsible purchasing..... 18

Free economic competition ..... 20

Prevention of money laundering, financing of terrorism ..... 21

Copyright and intellectual property ..... 23

## **Commitment to our associates and environment**

Promoting diversity and inclusion in the workplace.....	25
We prevent workplace violence, bullying, and sexual harassment.....	27
We respect human rights.....	30
Preventing human trafficking and sexual exploitation of children and adolescents in the context of travel and tourism.....	32
Occupational health and safety.....	34
Commitment to environment and sustainability.....	35
Conflicts of interest.....	36

## **Protection of assets and resources**

Protection of assets and work tools.....	38
Data protection and information security.....	40
Use of Social Networks, Internet, and Artificial Intelligence .....	42
Report any situation to our Ethics Hotline.....	44

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## Introduction to our Code of Ethics and Conduct

The Code of Ethics and Conduct aims to disseminate our values, our organizational culture based on compliance and integrity, as well as the behaviors we must follow in our daily lives when being part of PAM Hotels or when creating a business relationship with PAM Hotels.

All associates and managers of PAM Hotels must respect the laws and regulations of the countries in which we operate. We must seek the growth of PAM Hotels as a business and always adhere to principles of integrity, respecting our values.

Our Code of Ethics and Conduct is a guide to our standards of behavior and also provides examples of situations that are contrary to our organizational culture of compliance and integrity, which should be reported accordingly, even if it is only a concern, provided the report is filed in good faith.

It is clear that no document can anticipate and address each and every situation that may arise, so if you are ever faced with this type of circumstance and have any doubts, you can contact the Compliance Department, which is responsible for resolving any doubts and interpreting our Code of Ethics and Conduct.



It is our responsibility as employees and managers to be familiar with the Code of Ethics and Conduct, our internal policies, and the external regulations applicable to each of the activities for which we are responsible. Any non-compliance or breach of our Code of Ethics and Conduct will be assessed by the Ethics Committee if necessary for the application of the corresponding disciplinary actions or sanctions.

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## Who must comply with our Code of Ethics and Conduct?

The PAM Hotels Code of Ethics and Conduct is applicable to all associates, managers, and stakeholders with whom we do business, such as our suppliers, business partners, agents, auditors, and consultants, regardless of the jurisdiction or country in which they are located.

Each and every one of us must comply with, enforce, and respect our Code of Ethics and Conduct through the expected behaviors and abstentions described in the following sections.

Each of us is responsible for ensuring that this Code of Ethics and Conduct is known and complied with by everyone. For this reason, we conduct periodic training and awareness sessions on its content and scope; and we ask you to participate in all the sessions to which you are invited and to set the best example in every action you carry out on behalf of PAM Hotels.



## **Mission**

We lead innovative brands with personality, offering experiences that make you keep coming back.

## **Vision**

Creating the best experiences in key destinations.

## **The values that guide us**

Agility in decision making

Quality and continuous improvement

Flexibility and innovation

Integrity

Passion for service

Safeguarding human talent

Collaborative work and synergy

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## A culture of compliance

At PAM Hotels, we are committed to complying with all applicable laws and regulations in the countries where we operate and thereby creating the best experiences in key destinations for our guests and customers.

This fundamental principle is a strictly followed guideline for all the decisions we make.

If in any circumstance you need to clear up any doubt about the best way to make a decision in accordance with our values and the Code of Ethics and Conduct, you can do the following:

Seek advice from your line manager. They will be able to guide you on the best ethical decision.

- Always make decisions that favor full compliance with the applicable laws and regulations.
- Consult with the Compliance Department, where you will receive additional guidance on whether or not there is a compliance risk in the decision or action.
- Call our Ethics Line without fear of retaliation or reprisals, so that you can safely and confidentially raise concerns or complaints about alleged breaches of applicable laws, this Code, and/or our internal policies.

PAM Hotels has a Compliance Management System structured on the basis of the best local and international practices and therefore, we actively promote that all of us are responsible for compliance within the scope of our functions, assuming that to comply well is to comply ethically.

At PAM Hotels, respect for and adherence to our Code of Ethics and Conduct, as well as our internal policies and procedures, are the foundation of our organizational integrity and our reputation in the marketplace. We are committed not only to respecting these principles and guidelines in all our actions and decisions, but also to encouraging adherence and commitment to these principles by our suppliers and the communities in which we operate.

- We ensure that our Code of Ethics and Conduct, along with all relevant policies and procedures, are clearly communicated to all associates, suppliers, and stakeholders from the beginning of the relationship with PAM Hotels.
- We are aware of and disseminate the channels of our Ethics Hotline where any situation or violation of our Code of Ethics and Conduct, policies or internal procedures can be reported. We guarantee that all reports are treated seriously and impartially and that the persons filing them are protected against retaliation.

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- **Internal investigations:** We take any allegation or suspicion of non-compliance very seriously. All associates of PAM Hotels provide support for internal investigations and it is our responsibility to provide information to clarify the facts under investigation. Failure to respond to or obstruct an investigation shall be subject to sanction.
- **Due diligence:** We make sure we know with whom we do business or whom we hire, through a complete evaluation of public sources of information in accordance with the procedure we have established, making decisions appropriate to the level of risk that each supplier may represent to us in terms of compliance.

**For more information, see:**  
[Compliance Policy.](#)

## Integrity in our ways of doing business

### Our commitment to quality and hospitality

For us, quality and a culture of hospitality are the fundamental pillars of our identity and strategy. Our commitment to service excellence and mindfulness is reflected in every aspect of our interaction with guests, clients, and associates. Hospitality should not only be seen as a service we offer, but as a way of living and the manner in which we relate to the world around us.





### To achieve this, we:

- Strive to create memorable experiences for our guests, anticipating their needs and exceeding their expectations at every opportunity.
- Training and continuous development of our team are essential to foster this culture of hospitality and quality. We invest in training programs that not only improve the technical skills of our associates, but also reinforce the importance of empathy, respect, and warmth in dealing with others.
- Innovation in service delivery is another cornerstone of our quality and hospitality strategy, as we innovate and improve by adopting new technologies and sustainable practices that not only enhance the guest and customer experience but also contribute positively to the community and the environment.
- We listen and take action. Feedback from our guests, clients, and associates is invaluable to us and our continuous process of improvement. We are committed to maintaining open and transparent communication channels, ensuring that all voices are heard and valued.

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### What we should not do:

- Invading the personal space and privacy of a customer, guest, or associate.
- Taking or requesting photographs, autographs, or making any other requests to a guest or customer.
- It is forbidden to disseminate information or provide data or details of a guest or customer.



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DOMA



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## Corruption and bribery

We do business in an ethical and legal manner; therefore, there is no margin of tolerance for corruption and bribery. No associate, manager or interested party acting on behalf of PAM Hotels may offer, facilitate, deliver or participate directly or indirectly in the delivery of money or anything of value (meals, jobs, gifts, services, travel, donations, etc.) to a public or private official with the intention of obtaining special treatment for PAM Hotels, for themselves, or for third parties.

Any actual or suspected conduct will be investigated internally and the highest legal consequences provided, including those set forth in our Progressive Discipline Policy, shall be applicable for both public and private corruption cases.

### **The following behaviors are prohibited:**

- Giving gifts, hospitality, requests, or equivalents to public servants.
- We do not accept facilitation payments.
- We do not make donations for political purposes.
- Manipulating or falsifying accounting records.
- Bribing or allowing oneself to be bribed.

**More information on permitted and non-permitted activities can be found at:**

[Anti-Corruption and Bribery Prevention Policy.](#)  
[Prevention of Conflict of Interest Policy.](#)

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## Gifts and hospitality

During the establishment of business relationships, it is common, in some situations, to receive or offer hospitality or gifts. At PAM Hotels, this activity is not prohibited as long as we ensure that the behavior of PAM Hotels and its associates in receiving or offering hospitality or gifts is impartial, objective, and ethical.

In this sense, any hospitality or gifts offered or received by our associates, managers, or stakeholders must reflect the values of our organization and must not, under any circumstances, influence business decisions or create an actual or apparent conflict of interest.

### For us as associates or managers, it is prohibited to:

- Ask for gifts or hospitality from customers, suppliers, or interested parties.
- Offer or receive any type of hospitality to any public servant, avoiding any perception of any attempt of undue influence.
- Gifts offered or received must be of a symbolic nature and may not exceed the nominal value established in our Hospitality and Gifts Policy.
- It is not permitted to receive or give gifts of cash, exchangeable for securities or cash equivalents.
- Receive or offer tickets to any type of event, such as concerts, technology or professional conventions, sporting events, or personal favors.

For more information go to: [Hospitality and Gift Policy](#).



## Accurate accounting records

At PAM Hotels, we emphasize the importance of keeping accurate, true, exact, and transparent accounting records that accurately reflect our financial transactions and operations. Integrity in accounting is essential to ensure the trust of our stakeholders and to comply with the legal and regulatory obligations.

- All employees within the scope of their duties must ensure that records are complete, accurate, and up to date, in accordance with international accounting standards and the industry's best practices.
- Manipulation, omission, or alteration of the information in the accounting records for the purpose of concealing or disguising the true nature of transactions will not be tolerated.

Any irregularity detected in the accounting records should be reported immediately through **the Ethics Line** or by e-mail to **[linea\\_etica@pamhotels.com](mailto:linea_etica@pamhotels.com)**

## Responsible purchasing

We are committed to responsible purchasing practices throughout our supply chain, ensuring that our associates and suppliers operate in accordance with the highest ethical and compliance standards.

All associates involved in the purchasing process must evaluate and select suppliers not only based on economic criteria, but also considering compliance with labor, sustainability, and social responsibility regulations in accordance with the contents of this Code of Ethics and Conduct and our internal policies.



**That is why we must always:**

- Assess compliance with labor, tax, quality, and hygiene regulations in order to internally qualify our suppliers for inclusion in our catalog of verified suppliers.
- Avoid accessing suppliers that have not been verified or do not have an agreement or documentary support.
- To adhere our suppliers to our culture of compliance and business ethics, including respect for human rights, the prohibition of child or forced labor, the implementation of sustainable environmental practices and the prevention of public and private corruption.

- Promote inclusion and diversity within our supply chain, including local suppliers or suppliers from our communities, minority groups and sustainable options.
- We do not do business with suppliers from countries in conflict situations or countries that do not ensure respect for human rights.

**For more content and information, go to:**

[Purchasing Policy.](#)

[Due Diligence Policy.](#)

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## Free economic competition

We recognize the fundamental importance of fostering and maintaining a fair and healthy competitive environment. Therefore, at PAM Hotels:

- We fully comply with all applicable antitrust laws and regulations in the territories where we operate. This commitment includes compliance with antitrust and unfair trading regulations, ensuring that our operations contribute to a competitive and fair marketplace.
- We foster respectful and ethical relationships with our competitors:
- We do not agree prices or conditions with competitors. We refrain from engaging in anti-competitive agreements, such as price fixing, market sharing, or boycotts, and we reject any attempt to limit free competition through coercive or abusive practices.
- We strongly oppose any kind of unfair competition, such as the improper use of confidential information, defamation of competitors, or market manipulation.

At PAM Hotels, we invest in continuous research and development to improve the quality and experience of our guests and customers, driving free competition in the market through this innovation.

**Learn more through: [Policy on Free Economic Competition.](#)**

## Anti money laundering, financing of terrorism

At PAM Hotels, we recognize the critical importance of combating money laundering, terrorist financing, fraud, as well as crime in general, not only as a legal and regulatory obligation but also as an essential element of our corporate and ethical responsibility.

### For this reason:

- We implement rigorously designed policies, procedures, and internal controls to detect, prevent, and report to the authorities any suspicious activity that may be related to these crimes.
- We conduct risk assessments for the prevention of compliance risks, including the prevention of money laundering and terrorist financing.
- We promote due diligence as the core of our business relationships.
- We report any alert or suspicious activity that may indicate money laundering, terrorist financing, or fraud.
- Cooperating with regulatory and investigative authorities, as well as following up and complying with all identification and reporting obligations.

The integrity and reputation of PAM Hotels depends on our unwavering commitment to meeting money laundering and terrorist financing prevention guidelines.

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If you know of any case or suspect a situation, even if you are not sure, please contact the Ethics Line to report it.

**More information:**

Money Laundering Prevention Policy.  
Criminal Compliance Policy.



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## Copyright and intellectual property

At PAM Hotels, we manage and generate international brands. We value and actively protect our intellectual property and that of the brands we represent, taking appropriate legal steps to register and defend our copyrights, patents, licenses, trademarks, and designs. We consider our intellectual property as a vital asset for the development and competitiveness of our company.

We are committed to respecting the copyrights and industrial property rights of third parties, recognizing that creative works, inventions, brands, and designs are the result of the intellectual effort and investment of their creators and owners.

At PAM Hotels we observe the following when making decisions related to copyright and intellectual property.

- In the event that we need to use works protected by copyright or industrial property rights belonging to third parties, we undertake to obtain the necessary authorizations and licenses, respecting the terms and conditions stipulated by the holders of the rights.
- Associates must ensure that the use of the PAM Hotels brand and those of its companies and hotels, including logos, distinctive phrases, slogans, or other identifying elements, is always done in a professional and accurate manner, in accordance with the guidelines expressly provided for the use of the brand. Misuse, alteration, or misrepresentation of the brand is strictly prohibited and may result in penalties.

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**We must remember:**

- It is absolutely prohibited and we will refrain from engaging in, promoting, or endorsing any practice that infringes copyright or violates industrial property.
- Associates, suppliers, and other interested parties of PAM Hotels are prohibited from associating our brands with activities, content, or speech that may be considered offensive, discriminatory, defamatory or in any way negative. This includes, but is not limited to, posting inappropriate content on social networks, forums, or any other media.
- Prohibition of political use: Associates, suppliers, and other interested parties must refrain from using the PAM Hotels brand, under their ownership or license, in a context of political proselytism or to support any political cause, campaign, or activity with the aim of favoring political parties, candidates, or public servants.
- The brand must not be used in such a manner that it suggests endorsement of political parties, candidates, or political agendas of any kind by PAM Hotels, its brands, or licensed brands.

**More information:**  
[PAM Hotels Brand Manuals.](#)



## Commitment to our associates and environment

### Promoting diversity and inclusion in the workplace

At PAM Hotels, we firmly believe that diversity enriches our work environment and contributes directly to our success.

We are committed to promoting an inclusive environment that respects and celebrates individual differences and provides equal opportunities for all employees.

### To carry out this commitment, we adhere to the following principles and actions:

- **Building Diverse Teams:** We strive to build and maintain teams that reflect the diversity of the communities in which we operate. This includes hiring and promoting employees from diverse backgrounds, nations, cultures, perspectives, and experiences, ensuring that our selection process is fair, transparent, and free of bias.
- **Promotion of Equal Opportunity:** We guarantee equal opportunities in all aspects of the employment relationship, including recruitment, selection, promotions, professional development and working conditions.
- **We Celebrate Cultural Diversity:** We value and celebrate the cultural and personal diversity of our employees through initiatives that promote understanding and appreciation of different perspectives and traditions.

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- **Fostering an Inclusive Environment:** We are committed to creating a workplace where all employees feel valued, respected, and able to contribute fully to our objectives.

We ensure that all employment decisions are based solely on merit, competence, and performance, without any reliance or distinction on race, color, religion, gender, gender identity, sexual orientation, age, origin, special abilities, or any other characteristic protected by law.

- **Prohibition of Discrimination and Harassment:** Any form of discrimination or harassment in our workplace, whether based on race, color, religion, gender, gender identity, sexual orientation, age, national origin, ethnicity, disability, marital status, state of origin, or any other characteristic protected by law, is strictly prohibited. This prohibition covers all employment activities, from hiring and promotion to daily interaction and termination of employment.

- We respect the dress code assigned to each PAM Hotels business unit and brand, maintaining a good image.

**For more information, see:**

[Hiring Policies](#)

[Internal Labor Regulations.](#)



## **We prevent workplace violence, bullying, and sexual harassment**

At PAM Hotels, we promote a safe, respectful, and inclusive work environment, free from any form of workplace violence, bullying, and sexual harassment.

Our commitment is to ensure that all customers, guests, visitors, and collaborators, regardless of their position, gender, sexual orientation, race, or any other characteristic, feel valued and protected.

### **At PAM Hotels:**

- We have adopted a zero tolerance policy toward workplace violence, bullying, and sexual harassment. Any act that violates the dignity or integrity of our associates will be sanctioned in accordance with applicable legislation and our internal policies.
- We implement training and awareness programs for all our associates to promote understanding of what constitutes workplace violence, bullying, and sexual harassment, and how to prevent them.
- We have an Ethics Hotline you can call if necessary, respecting anonymity and prohibiting retaliation against anyone who reports any irregularity or undesirable situation in good faith.
- We will investigate any suspicions and impose disciplinary sanctions as appropriate.

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**What to do?** \_\_\_\_\_

- Immediately report any behavior or situation that may constitute workplace violence, bullying, or sexual harassment.
- Participate in training and awareness sessions on the matter.
- Promote and communicate our culture of zero tolerance to workplace violence, bullying, and sexual harassment.



**What not to do?** \_\_\_\_\_

- We do not treat any person inside or outside the facilities with rudeness, disrespect, or physically or verbally assault.
- It is forbidden to take photographs or record associates without their consent.
- Making fun of the physical, cultural, or religious appearance of a collaborator, client, guest, or interested party.

- We do not ignore or minimize complaints or signs of workplace violence, bullying, or sexual harassment that we suffer or that are reported to us by our coworkers. We try to guide or channel any situation to Human Resources, the Compliance Department or anonymously to our Ethics Line.
- We never use the Ethics Line for the purpose of discrediting, denigrating, or damaging a person's reputation by reporting false accusations; doing so may be severely punished in accordance with our internal policies.
- We must not disclose information about a case of workplace violence, bullying, or sexual harassment that is under internal investigation if for any reason you are part of the investigation.

**For more information, see:**

Policy for the prevention of workplace violence, bullying, and sexual harassment.

Internal Investigation Policy.

Internal Labor Regulations.

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## We respect human rights

We are committed to respecting and promoting human rights in all the countries where we operate, respecting our guests, customers, associates, and our stakeholders in general.

**This commitment is manifested when we adhere to the following behaviors and make them our own:**

- We categorically reject the use of child labor in our operations, hotels, business units, and offices.
- We do not deal with suppliers or stakeholders that have been sanctioned for or are linked to the use of child labor.
- We ensure compliance with all local and international laws regarding minimum age for employment and support initiatives that promote the education and well-being of children and adolescents through the PAM Hotels Foundation.
- When hiring, we ensure that all employment agreements reflect clear and fair employment conditions. We adhere to current labor standards, ensuring reasonable working hours, adequate rest periods, and fair and equitable remuneration.
- We respect the right of our employees to join the union of their choice freely and voluntarily.



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- We reject any form of human trafficking and we are committed to raising awareness in our organization on the matter, organizing training and awareness days so that our associates have the tools to face these risks.
- Through the Ethics Line we warn against any signs of trafficking within our operations and supply chains, collaborating with the corresponding authorities and organizations to combat this serious human rights violation.

**For more information, see:**

[Human Rights Policy.](#)

[Protocol for the Protection of Children and Adolescents.](#)

## Preventing human trafficking and sexual exploitation of children and adolescents in the context of travel and tourism

At PAM Hotels, we reject any form of human trafficking, especially sexual and/or labor exploitation of children and adolescents. For this reason, PAM Hotels is a member of ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes), a global organization that promotes putting an end to this illicit activity, especially in the context of business travel or tourism.

### We encourage the following actions:

- We train our collaborators and especially all those who have contact with our guests or clients so that they can attend or address any alert situation that may arise. The reception areas are especially responsible for verifying the identity of our guests.
- We establish strategic alliances with local, national, and international authorities, as well as with civil organizations dedicated to the fight against human trafficking and sexual exploitation of children and adolescents.
- We develop and implement strict policies and procedures to prevent human trafficking and the sexual exploitation of children and adolescents in all our operations.

- It is our responsibility to verify the identity of our guests and visitors.

**For more information, see:**

[Human Rights Policy.](#)

[Protocol for Protection against Commercial Sexual Exploitation of Children and Adolescents.](#)

## Occupational health and safety

We are committed to complying with all applicable occupational health and safety laws, regulations, and standards. We seek to exceed the minimum required standards, adopting the best industry practices to ensure an optimal work environment where safety comes first.

### Therefore, we focus our activities on the following:

- We strive to pro-actively identify, assess, and manage occupational hazards to prevent accidents, injuries, and occupational diseases.
- We ensure to provide personal protective equipment and clothing, and adequate training to make sure that high-risk activities are safe.
- We work on emergency response protocols and conduct periodic drills to ensure the preparedness of our teams for any eventuality.

### It is important we adhere to the following actions:

- To use appropriate personal protective equipment for our activities if necessary.
- If you find yourself in a situation that could generate risks to your health or safety, you have to report it immediately to the line manager and to the Integral Safety Area.
- Report any known non-compliance to the Ethics Line.

**For more information, see:**  
[Occupational Health and Safety Policy.](#)

## Commitment to environment and sustainability

We recognize the importance of protecting our environment and promoting sustainable practices in all our operations, and for this reason we follow the following principles in the way we operate:

- In our businesses, we always seek to reduce waste, increase energy efficiency and sustainable management of natural resources.
- We foster a culture of sustainability with our guests, customers, employees, suppliers, and stakeholders by promoting practices that contribute to the conservation of the environment and the well-being of the local communities where we operate.
- We actively participate in local and international initiatives for environmental conservation and sustainable development, collaborating with organizations, communities, and authorities to achieve a broader positive impact.

PAM Hotels organizes activities and campaigns to raise awareness of the importance of sustainability and how each individual can contribute to its improvement.

Your contribution is essential to communicate and bring to life our environmental and sustainability policies.

Attend our awareness-raising activities, recycling days, and other activities we organize.

**For more information, see:**  
[Environmental Policy.](#)

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## Conflicts of interest

Business decisions made by PAM Hotels, associates, managers, and representatives must always be made prioritizing the best option for the company, avoiding decisions that are influenced by personal, family, partner, or business benefits.

We understand that conflicts of interest may arise in the normal course of our operations and that is why we are committed to the responsible management of conflicts of interest. The following is a guideline of behaviors you must adhere to:

- All associates and managers are required to declare at least once a year any type of conflict of interest, regardless of whether it is perceived as apparent or real.
- At PAM Hotels, family members of our associates and suppliers are allowed to work for us, as long as there is no direct subordination of the employee to his or her family member or to the family member of the supplier with whom he or she is in contact.
- Partner relationships between PAM Hotels employees must be reported as a conflict of interest in order to be reviewed in accordance with our internal policy.



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- At PAM Hotels, we respect the rights of our associates to hold secondary jobs. However, they must respect the working hours established by PAM Hotels and must not use company resources and information for their secondary jobs.
- Employment with companies that are considered competitors of PAM Hotels is not permitted.

In case you have any doubt, you can contact the Compliance Department, which is responsible for analyzing each situation and interpreting the internal policy.

**More information:**  
[Prevention of Conflict of Interest Policy.](#)

## Protection of assets and resources

### Protection of assets and work tools

At PAM Hotels, we value and protect our assets and the work tools provided to our associates as essential resources for the effective and efficient performance of our operations.

**Associates, managers, and representatives must observe the following principles:**

- We must take care of and make proper and efficient use of company-owned assets. We promote sustainability through our actions. For example, we turn off unused lights, print only when necessary, etc.
- It is prohibited to use company property for personal purposes or to remove it from the premises without the required permission in each business unit.
- Employees using Family and Friends benefits or discounts provided by PAM Hotels must follow the rules and policies of use, as damage to the facilities may result in penalties in accordance with our internal policies.
- It is forbidden to use information, images, or PAM Hotels trademarks without authorization to do so.

- It is forbidden to sabotage or allow the sabotage of communications in internal communication networks.
- It is forbidden to lend, disseminate, or authorize the improper use of technological assets, including e-mail accounts, usernames, or passwords.
- It is the collaborator's responsibility to report any situation in which they become aware of any improper use of PAM Hotels' facilities or property.

**For more information, see:**  
[Internal Labor Regulations.](#)

## Data protection and information security

At PAM Hotels, we maintain high standards of Information Security and Personal Data Protection. For this reason, we ensure that our information systems comply with the regulations of the countries in which we operate and maintain confidentiality at all times.

We also train our associates in the proper use and handling of personal data of our guests, customers, suppliers, and stakeholders.

Associates, managers, representatives, and suppliers of PAM Hotels in their normal activities must ensure that they comply with the following conduct:

- Ensure that internal information is used exclusively by authorized persons at PAM Hotels, maintaining their confidentiality at all times.
- Classify the information used and generated in accordance with the Information Classification Policy in order to identify whether the information is: public, internal, or confidential.
- Immediately report any attempt to misuse the information.
- Disclosure of PAM Hotels' internal or confidential information is prohibited and may result in severe consequences.

- To request consent for the use of the holder's personal data whenever appropriate and to respect at all times the purposes of use established in the Privacy Notice.
- Sign the corresponding confidentiality agreement in accordance with the guidelines of the legal area, whether for a collaborator, supplier, or interested party.
- Not to use confidential information to which they have had access, for example: trademarks, industrial property rights, trade secrets, financial information, processes, manuals, work documents, information and/or personal or sensitive data of guests, clients, associates, or suppliers, if it is not for any purposes related to PAM Hotels and its contracted activities.
- Use software and systems specifically authorized by PAM Hotels and under legal licensing.

**More information:**

[Information Security Policy.](#)

[Information Classification Policy.](#)

[Data Protection Policy.](#)

This document is confidential and the exclusive property of PAM Hotels.

To protect our information, please be reminded that it must not be photographed or disclosed outside the company, whether in whole or in part. The proper use of this material is the responsibility of each and every one of us as employees. Please always ensure that this is the most current version for your daily operations.

## Use of Social Networks, Internet, and Artificial Intelligence

At PAM Hotels, we use tools to improve our operations, including social media and the internet. We are committed to using them responsibly, ethically, and in full compliance with applicable regulations.

### **Associates, managers, and suppliers must respect the following:**

- The management of PAM Hotels’ own social media accounts and those of its brands is carried out exclusively by authorized personnel. Posts and interactions with our followers must reflect our values, respect, and integrity; therefore, we avoid any content that could be perceived or considered offensive, discriminatory, or illegal.
- Employees, managers, and suppliers are not permitted to publish information, photographs, videos, or any other material owned by PAM Hotels without the prior consent of the marketing or public relations department.
- Employees and managers are not permitted to publish information about internal events on their personal social media accounts.
- Employees must use the internet for work purposes only.



- If you have a company phone and computer, the use of social media is not permitted, except in those areas that require its use for their functions, such as marketing, communication, talent attraction, and public relations.
- The use of personal social media accounts during working hours is not permitted. Failure to comply with this rule may be subject to sanctions in accordance with the Progressive Discipline Policy.

**For more information, see:**  
[Social Media Use Policy.](#)  
[Internal Labor Regulations.](#)

## Report any situation to our Ethics Hotline

Remember that you can report any irregular or suspicious activity or any activity that violates our internal policies. Your report will be investigated anonymously, confidentially, and without retaliation.



At your place of work:  
notify Human Resources



Write us an e-mail:  
**linea\_etica@pamhotels.com**



You can call us:  
**+52 800 211 6500**



Enter our report web page  
**www.eticapamhotels.com**



You can also send us a WhatsApp  
**WhatsApp 99 8275 3030**

All our channels are managed by an independent company that collects the information and guarantees the anonymity and confidential management of each report.

