

CORPORATE POLICY FOR THE PROTECTION OF MINORS



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1. PURPOSE

The purpose of this policy (hereinafter, the "Policy") is to establish a set of rules of conduct aimed at guiding the employees and collaborators of **Globales** (hereinafter, the "Company") in the event of observing any indication of activities or conduct that are or may be harmful, both physically and emotionally, to all those minors who are within the hotel facilities or its surroundings, such as customers or minors residing in the hotel's neighboring areas.

1.1 TYPES OF HARMFUL BEHAVIORS

- ✓ Physical abuse: hitting, shaking, shoving, pushing, poisoning, burning, choking, suffocating or any other action that causes physical harm to a minor.
- ✓ Emotional abuse: continued mistreatment of a child that has developmental effects, including putting them down, causing them to fear, or preventing them from participating in normal social activities.
- ✓ Sexual abuse: forcing a minor to engage in sexual activities such as pornography or prostitution, whether or not they know what is happening.
- ✓ Neglect: Persistent failure to meet a child's basic needs, whether physical or psychological, that is likely to have an impact on the child's development. Neglect ranges from locking a child alone in a room for relatively long periods of time or leaving him or her unsupervised, to restricting access to medical treatment, to failing to respond to emotional or educational needs.

1.1.a exual Abuse: Commercial Sexual Exploitation of Minors in the Tourism Sector

Faced with the widespread and worrying reality of the sexual exploitation of minors in the tourism sector throughout the world, since the beginning of the 1990s, numerous initiatives have been developed to protect children from this type of situation.

In 1990, social workers and other professionals from several countries in Southwest Asia, one of the places most affected by this kind of exploitation, started a non-profit campaign under the name ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes). Today, ECPAT is an international organization with representation in 50 countries whose main objective is to combat commercial sexual exploitation of children.

The first International Congress against Commercial Sexual Exploitation of Children was held under the initiative of ECPAT International in August 1996. Its content and Agenda for Action were based on the United Nations Convention on the Rights of the Child ("UNCRC").

As a result of these actions, an international awareness has been created among companies in the tourism sector, focused on their corporate social responsibility, thanks to which protocols and policies to combat injustices such as the sexual exploitation of minors are being implemented more and more frequently.

2. SCOPE OF APPLICATION

The Policy shall be applicable in the following areas:

- ✓ **Objective scope:** includes all tourism activities carried out by the Company. This scope includes all activities carried out by the different departments that make up any of the hotel establishments owned by the Company, as well as all administrative functions carried out in its offices.
- ✓ **Subjective scope:** the Policy is binding on all employees and collaborators of the Company in all of its establishments and offices, as well as on suppliers and external companies with which the Company is related, and the customers that receive the services offered by the Company in the exercise of its activity.

3. COMMITMENTS

In view of the potentially existing risk of situations or behaviors that are or may be harmful to minors, the Company is committed to carry out the following actions in order to prevent conflicts of this nature:

- ✓ To train the personnel of its establishments in the countries of origin and in the destinations in which it operates;
- ✓ Introduce a clause in contracts with their suppliers stating their common rejection of child abuse of any kind;
- ✓ Inform tourists by means of catalogs, brochures, posters, informative videos, tickets, web pages or in any other way deemed appropriate;
- ✓ Provide information to "key" local agents at each destination;
- ✓ Report regularly on the implementation of these measures.

Likewise, the following ways are recommended to combat exploitation of any kind towards minors:

- ✓ Cooperation between countries and between different sectors of society;
- ✓ Mobilization of the tourism industry and the business world so that their infrastructures are not used for purposes that are or could be harmful to minors;
- ✓ Actions to ensure the implementation and development of laws, plans and programs against this type of conduct or activities;
- ✓ Interaction and collaboration with the police and local authorities;
- ✓ Rehabilitation of minors who have been victims of any type of abuse;
- ✓ Preventive measures in the form of education and information.

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4 RESPONSIBILITY

In line with the commitments outlined above, the level of responsibility of the tourism sector has been defined in the following terms:

(a) Direct responsibility lies with those agents who knowingly disseminate, organize and host sex tourism trips (even if there is little evidence that they are involved), as well as with the operators of businesses or establishments where travelers may contact or exploit minors, namely accommodations, leisure centers and areas, etc. Tolerance of this type of activity implies complicity with operators and travel organizers.

(b) An indirect responsibility corresponds to tour operators, travel agencies, carriers, especially airlines, if they are aware that they are being used as vehicles to drive the perpetrators or potential perpetrators of this type of behavior and abuse of minors.

Therefore, the Company, as a potential vicarious liability operator, adopts this Policy in order to prevent criminal actions of any kind in relation to minors.

5. ACTION PROTOCOL AND COMPLAINTS CHANNEL

The persons and entities to which this Policy applies shall, in the event of any action or conduct that they observe and consider likely to be related to the exploitation or abuse of minors of any kind, immediately inform their responsible superior, who shall supervise and remain alert in order to detect any suspicious conduct.

As soon as the Company becomes aware of any potentially criminal activity contrary to the personal and emotional integrity of minors, it will initiate, in conjunction with the competent authorities, to whom he/she shall inform as soon as possible, the relevant corrective measures to put an end to the conduct and punish it appropriately.

In order to facilitate the reporting of activities contrary to the Company's policies and applicable laws and regulations, an anonymous whistleblower channel will be made available to both the Company's personnel and its external collaborators, which will be accessible through the corporate website. Through this channel, it will be possible to report problematic conduct more quickly and easily and to put an end to it more effectively.

Emergency telephone number – Guardia Civil: 062

Telephone ANAR foundation (Help for Children and Adolescents at Risk): 900 20 20 10

6. STEPS FOR THE PROTECTION OF MINORS

1. Observation
2. Communication
3. Complaint
4. Solution
5. Feedback

*Andrés García,
Chief Operating Officer*

PROTOCOL OF ACTION IN CASE OF A LOST MINOR

At Hoteles Globales we care about the safety of all our customers, and especially that of the little ones. For this reason, this protocol is established, in which the mode of action is developed in 2 different scenarios:

A) SCENARIO 1: Unaccompanied minor lost inside the hotel.

1. First, we will approach the child, trying to calm him down, and we will ask him if he has gotten lost. If yes, we will ask you who you are looking for (parents, grandparents, etc.).
2. We will ask the child for their name, and that of their adult companions, in order to find out their room number and contact details, and let them know that they can go to reception to pick up the missing child.

B) SCENARIO 2: parents or guardians do not know the whereabouts of the minor.

1. Parents or guardians should contact reception as soon as they detect the absence of the minor. This will then be brought to the attention of the staff and their collaboration will be requested for a search within the hotel facilities.
2. If the absent minor is still not found, a search will be organised outside the hotel, sweeping all outdoor areas near the hotel.
3. Finally, if none of the above points are successful, the police or relevant authorities (emergency telephone number: 112) will be notified to obtain their help in the search for the missing person, after which continuous communication will be maintained to inform them about the follow-up of the matter.