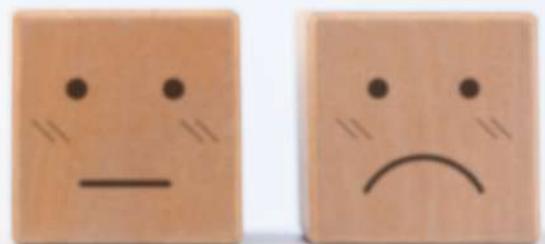


# RESPONSIBLE PURCHASING POLICY



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## 1. INTRODUCTION

The responsible and efficient management of purchases of materials and resources of any kind is one of the main objectives of **Globales** (hereinafter, the "Company"). For this reason, and in order to become a greener company, this responsible purchasing policy (hereinafter, the "Policy") has been prepared.

This objective implies an efficient and competitive management of the supply chain and goes beyond purely economic, logistical or administrative aspects.

The Company is aware of the new challenges it has to face, and maintaining its commitment to responsible business management and the contribution to sustainable development, the procurement function and the relationship with the supply chain is an area in which the values, principles and guidelines of conduct for the development of the professional activity must also materialize.

## 2. OBJECTIVE

This Policy is conceived with the aim of knowing, controlling and establishing collaborative relationships in terms of sustainability with the supply chain, as well as to generate and disseminate a purchasing policy with sustainability criteria that applies to the entire group and to establish spaces for dialogue with the different groups of suppliers that allow the transmission of the company's commitments to sustainability, always with the collaboration of its supply chain in these purposes.

Some general principles that should guide the Company's relations with its suppliers and contractors and that show the Company's interest in being inspired by the principles of Corporate Social Responsibility are materialized in the following objectives:

- ✓ Establish and publicize the commitment of **Globales** throughout the procurement management process and the social work that the Company performs.
- ✓ Promote among suppliers and contractors compliance with basic standards or criteria related to human and labor rights, occupational health and safety of their workers, respect for the environment and ethical behavior.
- ✓ Disseminate and ensure awareness and implementation of the United Nations Global Compact Principles among the Company's suppliers and contractors.
- ✓ In view of these objectives, this Policy establishes two levels of compliance with the guidelines contained herein:
- ✓ Internal: consists of the commitment of those who make up **Globales** to responsible purchasing; and
- ✓ External: based on the criteria for suppliers and contractors.

## 3. SCOPE

The Policy is applicable to all purchases of products and services made by any of the companies or entities that are part of **Globales**, thus covering all suppliers and contractors of the chain.

These suppliers and contractors are also expected to transmit the contents of this Policy to their own subcontractors.

Consequently, the contents of the Policy are addressed to both direct suppliers and indirect suppliers of the **Globales** chain.

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## 4. COMMITMENT TO RESPONSIBLE PURCHASING

The principles and guidelines of conduct that every employee of the Company shall contemplate, and the unique relationship that the Purchasing Department maintains with suppliers and contractors, shall be based on the following terms:

- ✓ The processes for the selection of suppliers and contractors of the Company are developed in light of the principles of impartiality and objectivity;
- ✓ All members of Hoteles Globales shall apply the necessary criteria of quality, opportunity and cost in the processes related to the Company's purchases, always acting in good faith and in defense of the Company's interests;
- ✓ When establishing business relationships with other companies or professionals, the following of behavioral and management principles similar to those of the Company shall be taken into account as a selection criterion.
- ✓ Wherever possible, the Company will purchase sustainable products, with certifications such as FSC or Fairtrade, that are easily recyclable or reusable, and whose packaging is as small as possible.

## 5. THE COMPANY'S COMMITMENT TO ITS SUPPLIERS AND CONTRACTORS

The relationships developed by **Globales** with its suppliers and contractors are based on respect for the business and professional project that these organizations represent legitimately and independently of the Company.

At the same time, they seek to build positive relationships that enable both the Group's business success and that of its employees.

Thus, **Globales** (through the company's purchasing department) establishes the following commitments in its relationship with suppliers and contractors:

### ***a) Conduct with integrity and conflict of interest***

**Globales**, and all persons acting on its behalf, shall observe in dealing with suppliers and contractors strict compliance with the legal regulations in force in all territories where the Company is present.

Likewise, those who hold the relationship with suppliers and contractors will bring to this function the integrity and professional ethics that characterize the professional behavior of Global Hotels employees, avoiding conflicts of interest, illicit payments, extortion, bribery or any other form of corruption.

### ***b) Promotion of sustainable business practices***

The Company will promote stable business relationships that enable its suppliers and contractors to meet their needs and commitments to economic, social and environmental sustainability. In this way, it will ensure that the defined delivery terms and payment conditions do not prevent them from complying with basic labor standards, environmental legality or compromise their economic sustainability. For the same reason, efforts will also be made to avoid drastic changes to the agreed conditions during the course of the business relationship.

### *c) Equality of opportunity and transparency and accuracy of information*

**Globales** shall promote free competition in its contracting processes, providing clear information on the conditions of participation and the evaluation criteria and creating the conditions that allow the selection of suppliers by means of objective, transparent and balanced criteria.

### *d) Confidentiality and protection of personal information*

Non-public information is considered reserved and confidential within **Globales**, applying the necessary mechanisms to preserve its integrity, availability and confidentiality.

Members of the Company who have access to this type of information in the relationship with suppliers and contractors shall ensure its confidentiality and shall refrain from disclosing or misusing it.

### *e) Contracting suppliers*

**Globales** will, to the extent possible, encourage and promote purchases from local suppliers and contractors in order to foster the development of the business fabric and job creation within the communities with which it has relationships.

### *f) Dialogue and communication*

**Globales** shall maintain fluid communication with its suppliers and contractors, ensuring that they receive timely, clear and truthful information on those matters that are of their most direct interest. It shall also collect those complaints and suggestions that The Company is committed to the continuous improvement that characterizes the Company in this and the rest of its management areas.

Finally, **Globales** will facilitate the responsible performance of its suppliers and the building of a mutually beneficial relationship with them.

## 6. CRITERIA FOR SUPPLIERS AND CONTRACTORS

**Globales** recognizes and values those business organizations that, like the Company itself, are committed to the creation of economic and social value. In this sense, the objective of the Company's supply chain management is to establish spaces for collaboration and cooperation in which, on the basis of a respectful attitude and dialogue, it is possible to move forward together through gradual and continuous improvement.

As a consequence, the relationships that Globales maintains with its suppliers and contractors will be characterized by the following features:

- ✓ Mutual respect and trust;
- ✓ Dialogue and exchange of clear information, so that both parties are aware of the commitments they are making;
- ✓ Common interest in promoting and developing innovation applied to improving quality of life, quality of work, and sustainability.

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**Globales** recognizes those suppliers and contractors that apply similar principles to those of the company and that can demonstrate it. Therefore, and based on the aforementioned attitude of respect and cooperation, the Company expects its suppliers and contractors to comply with the following basic standards related to ethical behavior, human and labor rights, occupational health and safety, and respect for the environment.

In addition to the application of these basic standards, suppliers and contractors with whom the Company has relationships are expected to comply with the applicable legislation in each case (local, regional, national, international, etc.).

In the event that provisions of the law and these basic standards address the same subject matter, the provision that affords greater protection shall apply.

### **a) Respect for basic human and labor rights**

**Globales** considers the respect, protection and promotion of human rights one of the fundamental pillars of its work and is formally committed to international initiatives and organizations working in this field.

The following are the basic criteria that **Globales** expects its suppliers and contractors to take into account in the area of business ethics and with respect to human and labor rights:

- ✓ Against forced labor;
- ✓ Free choice of employment. Workers shall not be hired against their will. No coercive means shall be used against workers with the aim of forcing them to continue working;
- ✓ Prohibition of harsh or inhumane treatment. Intimidation of workers through verbal abuse, physical abuse or discipline, threats or sexual or other harassment shall not be permitted;
- ✓ Elimination of child labor. Illegal child labor and any form of exploitation of children shall not be permitted. If children are found to be working, measures shall be taken that take into account, first and foremost, the interests of the child. If young workers are employed, they shall not be employed in conditions that are hazardous or that compromise their health, safety or moral integrity;
- ✓ Regularized employment. The work performed must be based on a recognized employment relationship, established through national law and practice, or international labor standards (whichever provides the higher level of protection);
- ✓ Respect for freedom of association and the right to collective bargaining. Workers without distinction shall have the right to join or form trade unions;
- ✓ Practice of non-discrimination. Discrimination in hiring, remuneration, access to promotion, dismissal or retirement on the basis of race, caste will not be allowed, birth, sex, age, family responsibilities, religion, disability, marital status, ethnic origin, nationality, sexual orientation, union membership or political affiliation;
- ✓ Payment of living wages. Wages and benefits paid shall at least comply with national legal regulations or the local regulations of the industry concerned, or whichever is higher. In any case, wages, minus those paid in kind, shall be sufficient to meet the basic needs of the workers. All workers shall receive written and understandable information about their working conditions in relation to wages before the start of the employment relationship and about the details of their wages during the pay period in question each time they receive wages. Deductions from wages as a disciplinary measure shall not be permitted;

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- ✓ Working hours are not excessive. Standard working hours shall comply with national legislation and industry benchmarks, with the one that offers the greatest protection to the employee prevailing.

### 7. BASIC OCCUPATIONAL HEALTH AND SAFETY CONDITIONS

**Globales** has a specific Occupational Risk Prevention Policy as a sign of the priority that this area of work represents for the Company. This policy includes the basic principles that the company is committed to assume in the development of its activity, and urges that these principles are also taken into account by its collaborators.

In any case, the minimum criteria that **Globales** defends and expects its suppliers and contractors to take into account in the area of occupational health and safety are the following:

- ✓ The company shall provide a safe and healthy working environment and take effective measures to prevent accidents or potential harm to the health of its workers that are associated with or occur during the course of work;
- ✓ The company shall minimize, as far as possible, the causes of risk inherent to the specific work environment. Workers shall receive regular information and training on safety, health and hygiene. This information and training on health, safety and hygiene. This information and training will be repeated for new workers;
- ✓ The company will provide the necessary and appropriate protective equipment;
- ✓ The company will provide access to potable water and clean services;
- ✓ The company will provide standards and procedures for waste management, treatment of emissions and discharges, and handling and disposal of chemicals and other hazardous materials;
- ✓ The company shall assign management responsibilities for safety and health to a management officer with sufficient status in the hierarchical organization chart. Combating forced labor.

### 8. RESPECT FOR THE ENVIRONMENT

The Company is firmly committed to the preservation of the environment in all its activities, establishing sustainable environmental management, the promotion of a low-carbon economy and the conservation of ecosystems as fundamental objectives of sustainable environmental management, the promotion of a low-carbon economy and the conservation of ecosystems as fundamental objectives of its Corporate Social Responsibility policy.

In this regard, in addition to the necessary internal strategic and management tools, the Company has various statements and policies that enable it to meet this commitment.

Therefore, **Globales** expects from its suppliers, in addition to scrupulous compliance with the environmental legislation applicable in each case, a behavior similar to that of the Company in terms of environmental respect.

### 9. ETHICAL BEHAVIOR

In addition to the aforementioned compliance with the applicable legislation in each case, **Globales** expects its suppliers and contractors to carry out their activities under a commitment to ethical behavior based on integrity and professional ethics, avoiding conflicts of interest, extortion, bribery or any other form of corruption, as well as avoiding any practice of unfair competition.