

POLICY ON CORPORATE SOCIAL RESPONSIBILITY

At **PortBlue Hotel Group**, a Majorca-based hotel company which both owns and operates holiday hotel establishments located in privileged places on the islands of Majorca and Minorca, we are aware of the natural value of our surroundings and of the value of the traditions and culture of the towns where our hotels are located, and we are also aware of the value of the professional standards of the personnel who work at the said establishments, and of their need for decent employment conditions, and at **PortBlue Hotel Group** we channel all of these aspects towards the maximum quality of our services and the care we offer our clients.

By performing our activities and services in accordance with respect for these values and their inter-relation with the interested parties, **PortBlue Hotel Group** has adopted this manifesto as the Policy of a company that is socially responsible and which aims to perform its activities in a sustainable manner, making its economic development and the quality of its services compatible with social responsibility and respect for the environment.

The implementation of this Policy is based on the following premises:

- Supporting the personal, employment, and social development of all company employees, encouraging their training, and particularly those who are performing tasks that are directly linked to the environmental and social aspects of the activity.
- Implementing all pertinent measures to ensure knowledge of, compliance with, and support for all applicable regulations and legislation governing employment, financial matters, the environment, workplace hazards, health & safety, and human rights within its area of influence.
- The Encouraging communication, both internal and external, in order to ensure the satisfaction of our clients and co-operation in the protection of the environment and the development of local culture and traditions.
- Reinvesting the economic development of the company back into the local community, supporting the recruitment of local people and the procurement of local produce.

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- Establishing the measures necessary to be aware of, control, and improve the environmental aspects of our activity, in order to make progress in environmental management and reducing the consumption of natural resources, applying the best available technology at our disposal. Likewise, minimizing the generation of any kind of waste, and ensuring that all waste is properly managed
- ♦ Encouraging suppliers and sub-contractors to implement environmental regulations and those governing the quality of their products, eliminating any risks to the safety of our clients and reducing CO₂ emissions in the provision of their services or the transport of their products.
- Co-operating with the authorities and pertinent bodies, and with any groups, entities, or associations that promote the enhanced management of our surroundings, the environment in general, and the human rights of all people.

This Policy is complemented by way of specific protocols governing matters of 'Health & safety', 'Good employment practice and human rights', Quality and the environment, and Support for the local community. In order to ensure that these protocols are properly implemented, any deviation from the principles established here will be detected, assessed, and rectified with the help of the business-administration system that has been implemented, based on ISO standards 14001:2015 and/or the European EMAS Regulations, the Travelife Sustainability system, and as such we are committed, in accordance with our economic development, to the continuous improvement of our activities in social and environmental matters.

The PortBlue Hotel Group undertakes to carry out periodical reviews of this Policy to ensure that it keeps pace with any changes to the internal or external circumstances of the company.

Alcudia, 1st June 2019

^{*} In case of doubt or error in the translation / interpretation, the Spanish version will prevail.



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QUALITY POLICY

- ❖ At PortBlue Hotel Group, satisfying the needs of our clients by offering and maintaining the highest quality in our services in a manner that is in compliance with our Corporate Social Responsibility Policy and our Environmental Management Policy is part of our philosophy, along with innovation and competitiveness. Our economic success and survival depend on our constant dedication to these principles.
- Quality includes each and every one of the aspects of the business, from planning through to the end service delivered to clients. The General Management is committed to allocating the resources necessary to comply with the procedures established, in order to ensure the implementation of this Policy.
- The primary objective is to satisfy 100% of our clients' expectations with regard to our establishment, and for this purpose measurable specifications are put in place to ensure that our services satisfy their needs.
- All of our facilities and raw materials are measured in accordance with established standards governing quality, health, and safety, and all suppliers are also required to comply with them.
- ❖ Our relations with our clients and suppliers are characterized by co-operation and open communication; we are committed to providing an enthusiastic and professional response to any needs that they may express.
- ❖ We ensure the suitability of all our staff, offering them training, skills, and refresher courses in those areas within their remit, so that they can all be familiar with, understand, and implement the content of the established procedures in the areas that apply to them.
- Through this commitment, **PortBlue Hotel Group** intends to ensure the continuous improvement of its facilities and of the services we offer our clients.

Alcudia, 1st June 2019

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PROTOCOL FOR THE HEALTH AND SAFETY OF EMPLOYEES, SUPPLIERS, AND CLIENTS

Our mission is to protect the health and safety of both our employees and our clients, including all suppliers and sub-contractors that may perform services at our facilities.

- For this purpose, we follow the principle of permanent improvement to our preventive actions, which includes, inter alia, prevention and health-protection activities, emergency procedures, ensuring people are suitable for the tasks they are to perform, how we select equipment and products, co-ordination between businesses, and other duties contained within the health & safety regulatory framework.
- ❖ The Company promotes and establishes the means necessary so that any deficiencies and/or suggestions for improvement can be reported and then examined, and where possible, implemented. The spirit of participation, innovation, and continuous improvement within the area of prevention is fundamental for the future of our Company.
- People are the Company's most valuable asset. As such they must be qualified and must identify themselves with the aims of our organization, and their opinions must be taken into account. Training and information on risks, as well as the resources and the measures to be implemented for their prevention, are of capital importance and must reach all employees of the Company.
- ❖ The Prevention Plan lays down the guidelines to be followed. Everyone must be familiar with it. The Company can rely on the participation of its employees and of the bodies that represent them for the purpose of implementing and performing this Prevention Protocol.
- Ensuring the health and safety of our customers is a principal aspect of the Company. Medical services are available to our customers at the hotel which they can access on request, and there are also materials and staff trained in first aid.
- Our swimming pool installations have staff to monitor them and fully-qualified lifeguards at the busiest times.
- The Company has a food-safety system which identifies critical points and performs a series of procedures aimed at avoiding incidents that may lead to food poisoning of any kind.
- Kitchen and restaurant staff have all been trained to the required standard for handling foodstuffs and ensuring that food processes are properly controlled.
- The Company's facilities meet the required legal standards with regard to industrial safety (inspections, electrical installations, preventive maintenance of thermal installations, water purification, etc.) and atmospheric emissions (noise, CO2...). For this purpose there is a procedure for the Identification and Evaluation of Legal Requirements, as well as a procedure for Operational Control within the Environmental Administration System certified in accordance with ISO 14001:2015 and/or the EMAS Regulations.

Alcudia, 1st June 2019

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ENVIRONMENTAL POLICY

PortBlue Hotel Group is a hotel company with significant growth expectations which aims to offer the highest quality standards in the hotel industry at a global level, while always maintaining our commitment to the environment and to the performance of activities in a way that cares for our surroundings.

Our hotels are in areas of high environmental interest. Therefore, our activities and services are carried out with respect for these special surroundings, and considering these circumstances the company sets out the following manifesto as its policy to be pursued, on the basis of the following premises:

- Get directly involved, leading the environmental management of our activities.
- To adopt all necessary measures in order to be aware of, comply with, and enforce, within its scope of influence, all legislation and regulations in force concerning the environment, workplace hazards, and health & hygiene, and to exceed their requirements, and also to ensure compliance with any other commitments undertaken by the organization.
- To establish the measures necessary in order to be aware of, monitor, and improve environmental aspects for the purpose of making progress in how they are managed, setting objectives and targets for them on an annual basis.
- To know, study and transmit the needs and expectations to our stakeholders in relation to environmental management. Involve suppliers and subcontracted companies in the adoption of environmental standards, such as the supply of environmentally friendly products.
- To study the risks and opportunities thanks to the environmental management system, and plan progressively actions to address them, approving annually a program of objectives according to them.
- ❖ To reduce the consumption of natural resources, applying the best available technology at our disposal, thereby contributing to the sustainable development of our area of influence.
- To ensure that waste generation is kept to a minimum, and to manage any waste that may be generated properly, using always the resources provided by the government for this purpose and the existing opportunities to reuse, recycle and/or value.
- To promote both internal and external communication with clients, seeking co-operation in the protection of the environment.
- To encourage the training and awareness of all staff, and in specially those whose job is directly linked to environmental aspects at the installations.
- To co-operate with the authorities and relevant institutions, as well as with any bodies, groups, or associations working for improved environmental management.

In order to ensure that this Policy Is implemented at its installations, PortBlue Hotels Group establishments operate an environmental management system based on ISO standards 14001:2015 and/or European Regulations 1221/2009 EMAS III. Through this environmental management system, any deviation from the principles set forth here will be detected, assessed, and remedied, and as such it undertakes to continually improve its conduct in environmental matters, as well as in those relating to health & hygiene and workplace safety.

The PortBlue Hotels management team undertakes to review this policy on a regular basis for the purpose of updating it in accordance with changing circumstances, whether internal or external.

Alcudia, 1rst June 2018

Fernando Porto Chief Executive PortBlue Hotel Group

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Our employees:

- o Shall receive a decent wage, in accordance with the Hotel Industry Collective Bargaining Agreement in the region.
- o Shall work the correct and pre-established number of hours in accordance with the national employment laws and in accordance with the hotel industry standards.
- o Shall be local people, wherever possible.
- o Shall be free to join a trade union or similar organization established to protect and represent the rights of employees.

The Management:

- o Promotes the provision of extraordinary benefits to its staff such as the washing of uniforms, meals, crèche, accommodation, according to individual cases and needs.
- o Encourages the development of its staff within their employment positions, improving their skills with training and professional development opportunities.
- Seeks to be aware of matters arising in the local community that may affect their lives, and ensures that their points of view are taken into account in the company's decision-making processes.
- O Undertakes to train employees to be aware of and abide by the practices and policies adopted by this Company for the protection of children and adolescents against commercial sexual exploitation, and to deal with situations of this kind that may arise in the performance of their tasks, promoting their role as preventive agents for this problem.
- Values its staff and treats them fairly and with respect, ensuring that no discrimination against anyone is allowed, irrespective of age, sexual orientation, sex, ethnicity, religion, culture, or disability.
- O Complies with all laws and regulations governing labour administration, and monitors all indicators associated with this task.
- o Trains its staff with regard to sustainability commitments, so that they understand their role in the performance of our aims and objectives.

Alcudia, 1st June 2019

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PROTOCOL ON HUMAN RIGHTS AND GOOD EMPLOYMENT PRACTICES

Human rights are those basic freedoms that are inherent to all human beings. They are based on the principles that all human beings — without distinction on the basis of religion, sex, nationality, skin colour, sexual orientation, age, culture, or disability — have a universal right to be treated with dignity, equality, and respect.

The Universal Declaration of Human rights identifies 30 fundamental principles or 'articles' which were adopted by the General Assembly of the United Nations in 1948:

1. All human beings are born free and equal	11. Innocent till proven guilty	21. Right to democracy
2. Do not discriminate	12. Right to privacy	22. Social security
3. Right to life	13. Freedom to move	23. Workers' rights
4. No slavery	14. Right to asylum	24. Right to play
5. No torture	15. Right to a nationality	25. Food and shelter for all
6. You have rights no matter where you go	16. Marriage and family	26. Right to education
7. Equal before the law	17. Right to ownership	27. Copyright
8. Your human rights are protected by law	18. Freedom of thought	28. Fair and free world
9. No unfair detainment	19. Freedom of expression	29. Responsibility
10. Right to trial	20. Right to public assembly	30. No one can take your rights

Many different kinds of people, including tourists, business guests, suppliers, and staff, visit hotels and guest houses, and although it is almost impossible to predict when a person is going to Infringe the human rights of another, it is important to understand how to deal with this risk in order to ensure the protection of the welfare of all vulnerable groups, including children, and that they are treated fairly and with respect without any distinction whatsoever.

At **PortBlue Hotels & Resorts** we are very aware of our influence when it comes to respect for Human Rights, and as such, and within the framework of our Policy on Corporate Social Responsibility, we establish the following principles:

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SUPPORT FOR THE LOCAL COMMUNITY PROTOCOL

PortBlue Hotel Group is committed to the continuous improvement of its services, compliance with legal requirements, attaining the maximum quality levels demanded by our clients, and adding value to our brand, while always seeking to contribute to the communities in which we live and working towards the development of sustainable tourism.

The Management takes responsibility for the impact that the company has on the local community by complying with the following guidelines:

- Supporting the local community with charitable donations or donations in kind to schools, natural spaces, or groups or initiatives aimed at improving the lives of local people, protecting the environment, or preserving the culture and traditions of the destination.
- ♦ Actively choosing to procure goods and services from local suppliers, as well as purchasing local produce wherever possible. A Actively Control of the co
- Promoting the destination amongst our guests, such as places of interest, local restaurants, markets, or handicraft establishments, so as to encourage them to explore the food, history, culture, and traditions of the country.
 - Advising guests on how to dress or behave in the surrounding areas and/or town, especially when visiting places of cultural significance or of special natural value.

The Management expresses its commitment to maintaining a close relationship with our local community, ensuring that their concerns about our operations are tackled jointly.

Alcudia, 1st June 2019

Fernando Porto Chief Executive PortBlue Hotel Group

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