



SMART HOTEL HOLIDAY

Our Mission

“Making hospitality an engaging, participatory and passionate project that knows how to express and give value to those who experience it and which aims at the constant growth of the company and its collaborators”.

ETHICAL CODE

To ensure high standards of business practice

Premise

The following Ethical code regulates the practice of companies Smart Hotel Holiday – Hotel Holiday srl (simply considered as Companies), regarding the business activity run by them.

The Company, not only respects, during the development of its proper activity, laws and current norms, but also high ethical standards, in its daily work. These standards and their inspirational values are collected in the following Ethical code (also called Code).

The Code is a supplementary tool for norms or regulatory norms and guidelines. The company believes that business decisions and behaviors of its employees are based on ethical rules, even if they are not codified by specific norms.

The term “staff” refers to the group of people working within the Company, or for it: employees, managers, partners with different job titles (as for example ongoing or occasional collaborators, experts and others).

The term “stakeholders” refers to the group of people having a direct or widespread interest in the Company, that could be relevant to the code.

The Code conveys commitments and ethical responsibilities accepted by those who , with different rules, cooperate to the realization of the goals of the Company towards: capital holders, employees, coworkers, external advisors, suppliers, clients and others like stakeholders connected to the activity of the Company.

The Code can be examined by clients, suppliers and other third parties that interact with the Company: in particular, it can be known (by the use of information technology or through web site) by third parties that get assignments from the Company, or that have long lasting relationships, asking them to respect the principles and conduct criteria, regarding the relationships with the Company itself. Also, with a declaration of responsibility from themselves.

Moreover, using the same modalities or using direct delivery, the code has been shown by all the staff,

Principles of conduct regarding the organization

The listed principles are considered essential. So, the Company is committed to respect those principles in relation to everyone.

Respect of laws and norms

The Company operates respecting the law and works to make sure that all the staff behave in the same way: people must respect the law, no matter the context and the activities. This commitment is also applied to consultants, suppliers, clients, and others having any kind of relation to the Company.

Behavior integrity

The Company is committed to supply quality services and compete within the market respecting the principles of equal and free competition and transparency, keeping correct behaviors with public, governative and administrative institutions relationship, and also with citizenship and their companies.

Rejection of any form of discrimination

Regarding the decisions that influence the relationships with its stakeholders (clients choice, relationships with capital holders, manager administration and work organization, selection and management of the suppliers, relationships with the community and with the institutions that represent it), the Company avoids any form of discrimination regarding age, sex, health, sexual orientation, nationality, ethnicity religious and political beliefs of its interlocutors. The same criterion is adopted during the choice of the staff and in relation to it. Some more objective criteria could be considered and will not be an obstacle for the rules of the present code.

Enhancement of human resources

The management of human resources is based on the respect of the personality and professionalism of everyone, in order to guarantee physical integrity and morality: the staff must keep a respectful conduct to the people with whom they get in touch, for the Company, treating everyone equally and with dignity. The Company does not tolerate any form of forced labor or done by minors and doesn't tolerate violation of human rights.

Equity of the authority

During the administration of the contractual relations that implicate the creation of hierarchical bonds, the Company is committed to make sure that the authority is exercised correctly and with equity, trying to avoid any form of abuse. Those values must be in any case safeguarded also in the choices of the work organization.

Legal protection of health, safety and environment

The Company intends to conduct its activity in a socially responsible manner and sustainable from the point of view of the environment, with the implementation of a system of environmental management that covers the production of waste, the energy consumption, use of water and CO2 emissions. It also pays attention to the correct and true spread of information regarding its proper activity.

Unethical behaviors

Behaviors of those who, individuals or groups, try to take control of others' collaboration, exploiting positions of strength, are considered unethical and favor hostile attitudes for the Company.

Accuracy in the contractual area

Contracts and work assignments must be executed in relation to what has been deliberately decided by the parties: the Company is committed to not exploit conditions of ignorance or incapability of its proper other counterparts.

Legal protection of the competition

The Company intends to protect the value of loyal competition, not being part of collusive behaviors, predators or position abuse. So, all the subjects who, with different rules cooperate with the Company, must not take part in deals contrasting the rules that regulate free competition between companies, in relation to what has been decided in agreements, norms or others based on objective criteria.

Enhancement of local communities

The Company is committed to the enhancement of local communities in which it operates, having the obligation to make at least 50% of its proper purchases from local suppliers. Also, sustain the same communities giving priority of assumption to people belonging to it.

Transparency and correctness of the information

In the creation of other contracts or rules that regulate behaviors with third parties, the Company pays attention to specify clauses in a clear and comprehensible way.

Protection of personal data

The Company collects and treats personal data clients, collaborators, workers and other subjects, physical and legal subjects. These data consist of every information needed to identify, directly or indirectly, a person and can include sensitive information such as those that reveal ethnic or racial origin, and/or health condition. The Company is committed to treat these data in the limit and regarding what decided in the actual norm related to the privacy, referring to the Leg. Law 196/2003 ("Privacy code") and attachments as well as prescriptions of the guarantor for the protection of personal data and to the regulations decided by the European Parliaments U.E. Council 27 Avril 2016 n. 2016/679. The staff of the Company who has, in the area of work, to treat data, sensitive or not, must always proceed in the respect of the norm and instructions given. The Company promotes the knowledge of the matter, regarding its proper staff.

Principles of behaviors followed by the staff

Il personale (per tale intendendosi gli amministratori, i lavoratori e i collaboratori a diverso titolo), nel comportamento da tenere nei confronti della Società devono osservare i principi seguenti.

Professionalism

Every person operates in a diligent, efficient and correct way, using instruments and time at the best, while assuming responsibilities related to fulfillment.

Loyalty

People must be loyal to the Company.

Fairness

Regarding their working activity, people must know and respect, in a diligent way, the organizational form and the current laws. Every unfair or disrespectful conduct of the norms will not be justified.

Correctness

People do not use, for their own purposes, - rather than in the authorized limits information, goods and equipment they can use during their work. Every person does not accept or make recommendations or reports that can create prejudices for the Company or disadvantages, undeserved profits. Every person refuses and does not undeservedly promise money or other benefits.

Discretion

People ensure maximum discretion, regarding news and information that characterize the business heritage or inherent activities of the Company, in respecting the laws, norms and internal procedures. Also, people within the corporation must not use private information for purposes that are not related to their work.

Conduct criteria

Relations with employees and collaborators

Staff selection

Regarding the choice of people to hire, it will be taken in consideration to the profits of the candidates, in relation to what is expected and meaningful for the Company, guaranteeing the same opportunities for all the interested subjects. The requested information is related to the verification of the aspects of the professional and psychometric profile, respecting the private sphere and the opinions of the candidate. The Company adopts, during the selection, relevant measures to avoid favoritism and special terms.

Constitution of working relation

The staff is hired with regular working or legally acceptable contracts; any form of irregular work is not tolerated. During the creation of their working relations, the person receives detailed information regarding:

- characteristics of the work and how to operate
- normative information
- norms and procedures to adopt, in order to avoid possible risks for the health due to the working activity

Staff handling

The Company is committed to protect people's moral integrity and dignity, guaranteeing the right of respectable working conditions. Everyone must be treated with the same respect and dignity and every person has the right to the same possibilities of professional and working development. The Company not only avoids any form of discrimination regarding its proper team, but also during the

choice of the staff. The access to roles happens on the base of knowledge and abilities. The evaluation of people is done in a large manner, letting managers to take part, the working staff and subjects in relation to the examined person.

Person's integrity and legal protection

The Company protects workers from acts of violence, also psychological, and refuses any discriminatory act or behaviour. The achievement of individual purposes must be equally evaluated. In particular, abuses and violence in the working place and is committed to adopt right measures regarding people that proposed them.

Abuses and violence are considered in relation to what is decided:

- Abuses happen when one or more people are subjected to deliberately and repeated abuses, threats and/or humiliation in the place of work.
- Violence happens when one or more people are attacked in the place of work.

Abuses and violence can be exercised by one or more superiors, or by one or more workers, women or men, with the purpose to violate another person's dignity, to harm or create a hostile place of work.

Everyone, in the Company, has the duty to collaborate to the maintenance of a place in which people's dignity is respected and relationships among people are favored, based on equal principles and correctness. Discrimination acts must be immediately reported to managers and representatives, without fear of recrimination. Inequalities are not considered forms of discrimination if justified or justifiable, based on objective criteria. It will not be considered discrimination the different retribution or level related to similar mansions.

Valorization and job training

Managers use and fully give value to all the working positions in the place, trying to favor the development and growth of the people through expert staff support, experiences to cover major responsible mansions, and learning courses. The formation is given to groups or individuals, based on specific necessities of professional development; also, the distance formation (through Internet), if active, not directly assigned, every person can benefit from it, based on interests outside working time.

Handling of people's working time

Every manager has to evaluate the people's working time, asking for inherent mansions to the exercise of their mansions and with their working organizational plans. It is considered abuse of authority, as an act due to the hierarchical superiority, mansions, personal favors or any behavior that could be a violation of the present ethical code.

People's involvement

The Company, as far as possible, tends to involve the staff in the working activity, trying to prevent moments of discussions for functional decisions to the creation of business purposes.

Health and safety

The Company is committed to offer an environment in which it is possible to protect the health and security of its staff. It is also committed to diffuse a security culture developing the consciousness of risks and promoting behaviors responsible by all the people. Moreover, the Company operates in

the preservation, mostly with actions securing health and safety of staff, collaborators and third parties. All the people must respect norms and internal procedures, regarding the prevention of risks and legal protection of health and security and to report malfunctions of the norms. Particular attention is given to the formation and information related to risks and measures related to hygiene and security

Legal protection of privacy

In relation to the team's personal data, the Company attends to dispositions of the Legislative decree 196/2003 and european norm 2016/679, if applicable. People get information on legal protection of personal data: treatment, subjects to whom the data are communicated, information regarding the right exercise in the article 13 Legislative decree 196/2003. In case the law requires it, people are asked for consent to the treatment of their personal data. Every survey on ideas, preferences, personal appreciation and, in general, the private life of employees and collaborators is excluded. Control or business instruments, in respect to the norm, can be adopted.

Staff obligations

General principles

People must act legally, to ensure mansions, in order to respect the obligations presented in the work contract and in the ethical code, assuring the required services.

Information handling

People must know and act on what has been decided in business politics, in relation to security information, to ensure integrity, reservation and availability. They must elaborate documents using a clear, objective and complete language, letting colleagues, managers or external subjects to make modifications when necessary.

Privacy of business information

Business information and know-how must be legally protected with confidentiality. People who are not authorized to answer questions or give personal information will talk to referents and inform them of instructions. If it is necessary to treat relevant topics, private or economics, it will be a duty to adopt necessary measures in order to safeguard the privacy, in relation to what elements have to be treated. During or after the end of the relation of work with the Company, people can use reserved data for the interest of the Company only.

Information related to third parties

The staff will not take part in the use of illicit means to acquire private information regarding companies and third parties. Those who, in a contractual relation, will know private information on other subjects will have the duty to use them exclusively in the relation itself.

Conflict of interests

Every person being part of the Company must avoid situations in which conflicts of interests can happen and avoid taking personal advantage of the opportunities obtained during their work. In case a conflict of interest happens, the person has the duty to communicate it to the manager or to the Supervisory Committee.

Use of business goods

Every person must operate in a diligent manner in order to protect business goods, using responsible behaviors and related to the procedures, documenting their mansion. In particular, every person must:

- use goods that receive in a good manner
- avoid wrong use of business goods that can harm or reduce efficiency, or in contrast with the interest of the Company.
- keep in a good manner given resources and inform units of eventual threats or dangerous events for the Company.
- follow the instructions regarding the Company.

With regards to IT applications, each person is required to:

- adopt the provisions of the company security policies, in order not to compromise the functionality and protection of the IT systems
- refrain from sending threatening or abusive emails, or from using low-level language, or from expressing inappropriate comments that may cause offense to people and/or damage the company image
- refrain from browsing Internet sites with indecorous and offensive content, and in any case not related to professional activities
- use company tools according to the instructions provided by the Company and generally for non-personal purposes.

The Company reserves the right to prevent distorted uses of its assets and infrastructures, through the use of control and risk analysis and prevention systems, without prejudice to compliance with the provisions of current laws.

Participation to antisocial and criminal activities The Company refuses antisocial and criminal processes and activities and declares to not take part in any of these. The staff of the Company must not have relations to this kind of things that could threaten the company or people's life. In relation to distorted questions, by antisocial or criminal subjects, people will refuse every compromise, outlay of money or performances. In the same way the Company refuses any kind of activity regarding pornography or pedopornography. In case cited above situations will happen, the staff will have the duty to inform referents or managers.

Relationship with the clients

Neutrality

The Company is committed to not discriminate against the clients. The evaluation related to previously identified criteria is not considered a form of discrimination. In particular, related to the association of the co-industry system or similar, that will be a manner of choosing or verifying offers.

Contracts and communications to clients

Contracts and communications to the clients of the Company must be:

- related to existing norms, in order not to create elusive or incorrect behavior
- complete, in order to not miss any important element for the client's decision

Behavior of staff in relation to the clients

Behavior of people working within the Company, regarding the clients, must be grounded on the concepts of availability, courtesy, in the view of a collaborative relation and professionalism to all levels.

Legal protection of personal data

The Company supports the respect of privacy related to personal data of all the clients regarding the existing norms. In the same manner, it is committed to the communication of all the clients, using, if necessary, their proper data.

Relationships with suppliers

Choice of the suppliers

Buying processes are important to the valorisation of the local community, united to the research for the best advantage for the Company. Also, to the concession of the same opportunities for the suppliers, to loyalty and impartiality. The selection of the suppliers and determination of buying conditions are based on an objective evaluation of quality and price of goods and services, also assistance and timeliness, taking in consideration eventual criteria of privileged evaluation previously identified.

Integrity and independence of relations

Relations with suppliers, also those related to financial and consultant contracts, are objects of constant control by the Company. Exchanged documents among the suppliers must be archived: in particular, accounting and/or fiscal, must be preserved for periods decided by the existing norm.

Legal protection of ethical aspects regarding the supplies

In the perspective of conforming the activity of supplying adopted by ethical principles, the Company can introduce, for particular supplies, and if considered as necessary, social requirements.

Dominant position

The Company is committed not to abuse, except for normal business relations, of eventual dominant position.

Legal protection of personal data

Also regarding the suppliers, the Company is committed to legally protect personal data, using them in the limits of the current norms.

Business relations in general

The choice of the partner

The choice of the business partners happens in relation to economics and organizational criteria, with no discrimination due to sex, race, political, statutory and religious opinions.

Contracts

The Company is committed to, during the first and contractual phase, to keep correct relations and correct information respecting the current norms. It is allowed to ask for information and

warranties. In the same manner, the Company equally asks partners to show information related to its proper personal and financial situation. The Company is committed to give information and details regarding contractual clauses.

Behavior of the parties

Parties, during the development of the relation, must behave correctly, trying to avoid prejudice and communicating eventual circumstances that can threaten the relation.

Legal protection of privacy

Parties have to preserve the privacy of the information they obtain during the relation. Data treatment must be in respect of the existing norms.

General business relations

The Company will preserve adopted principles during business and partnership relations, and also during international relations. The Ethical code has to be observed anytime, even if particular behaviors are not asked by laws or local norms. It is important to know and respect the laws and local norms.

Diffusion of information

External communication

Communication of the Company to subjects having interests, as quoted above, is oriented to the respect of the right of information; in any case it is not allowed to share news or false comments. Every communicative activity follows the law rules, professional conduct practises and it is created in a clear, transparent and fast manner. Not only is any form of oppression forbidden but also taking advantage of the mass- media is forbidden. In order to ensure complete and inherent information, relations with social media are reserved to declared functions.

Control on private information

Particular attention is reserved to communication of external documents, data or information regarding business facts that, if public, can influence the activity of the Company. In this case, communication must be previously authorized by administrators or subjects. In no way, behaviors can cause debits or personal or to third parties unfair advantage.

Mechanism of application of the Ethical code

Diffusion and communication

The Company is committed to diffuse the ethical code, using all the means of available communication and the opportunities such as, for example, the business website, specific and related to technology communication, reunions and learning process of the staff. All interested people must be able to access the ethical code, learn the contents and observe what is written.

Vigilanza in materia di attuazione del codice etico

The task to control the actuation and application of the ethical code regards:

- Managers and/or managing functions of the Company
- Administrative Council

Reporting problems and violations

If a person knows or discovers, or strongly believes in the existence of a violation of the existing code, law or business procedures, has the duty to inform the manager and/or the Surveillance Body immediately. The report has to be written not anonymously. The Company will conduct in the necessary manner, in order to protect the whistleblowers. The identity of the informer is ensured, without the prejudice to the law obligation.

Responsibility for investigations regarding possible violations of the Ethical code has to be done by the administrative body. The whistleblower and the reported person can be heard and the staff has the duty to cooperate. Behaviors related to penalty or contractual mechanism will be reported.

Disciplinary actions following the violations

Dispositions of the existing Code are part of the contractual obligations assumed by the staff and also by subjects having business relations with the Company. The violation of principles and behaviors indicated in the ethical code can threaten the relation between the Company and the people who committed the violation: administrators, employees, advisors, collaborators, clients or suppliers and can cause fines.

Towards employees

Failure to comply with and/or violate the rules of conduct indicated in this Code by employees of the Company constitutes failure to fulfill the obligations deriving from the employment relationship and gives rise to the application of disciplinary sanctions.

The sanctions that can be imposed will be applied in compliance with the provisions of the Law and the applied National Collective Labor Agreement, and will be paid based on the importance of the individual cases considered and will be proportionate to their severity. The investigation of the aforementioned infractions, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions responsible and delegated for this purpose.

Towards consultant collaborators and third parties

Any behavior carried out in violation of this Code by collaborators, consultants or other third parties connected to the Company by a non-employee contractual relationship may also determine, in the most serious cases, the termination of the contractual relationship, without prejudice to any request for compensation if such behavior causes damage to the Company and this also regardless of the termination of the contractual relationship.

Final disposition

The present Ethical code has to be approved by the Administrative Council of the Company and equally updated.

Venezia, 30 aprile 2024