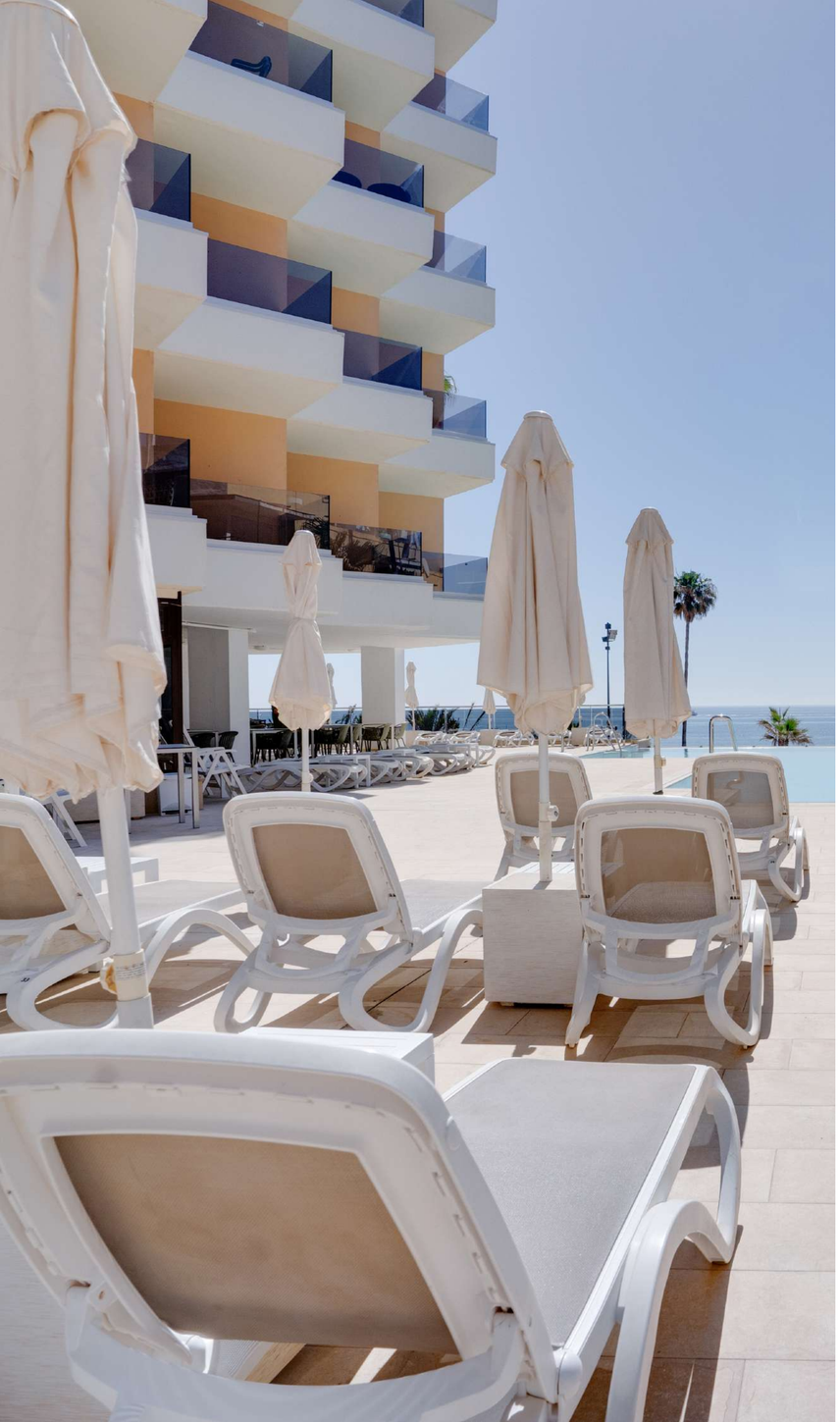
ML HOTELES

ETHICAL CODE

We pride ourselves on being an organisation committed to ethics and accountability in every action we take.



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1. LETTER FROM THE MANAGEMENT OF **ML HOTELES**

Dear collaborators, customers, suppliers, and other interested parties of **ML HOTELES**,

We are pleased to present our **Ethical Code**, a document that reflects our commitment to integrity, honesty, and ethics in the company. With this, we seek to establish clear lines of conduct and define standards, principles and values that reflect the essence of our organisation, promoting business ethics and mutual respect from managers to suppliers and neighbours.

Guided by a set of core values such as empathy, creativity, sustainability and, of course, ethics, we understand that our actions not only impact our immediate environment, but also society. That is why we are proud to promote fair, equitable and respectful practices in all our operations.

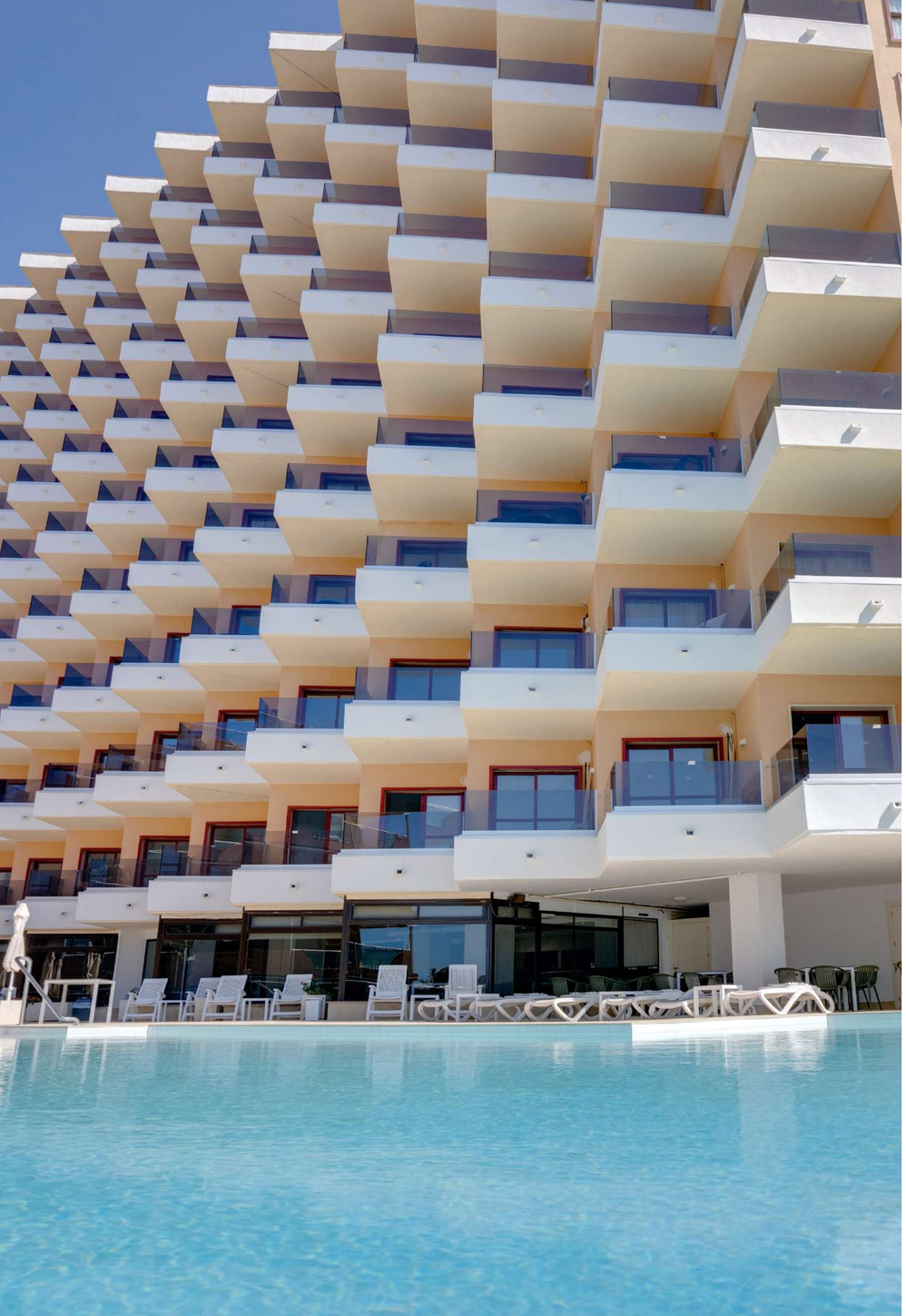
We firmly believe that honesty, transparency, and mutual respect are essential to build strong and lasting relationships, both inside and outside the organisation.

With this **Ethical Code** we renew our commitment to the company's core values.

We sincerely value your contribution to our business community and are confident that, united under the principles of this **Ethical Code**, we will continue to strengthen a culture of integrity and responsibility.

Yours sincerely,

Don José Carlos Escribano
Doña Mónica Martín



2. AIM OF THE **ETHICAL CODE**

The aim of this **Ethical Code** is to establish lines of conduct and define standards, principles and values in accordance with those that represent the **ML HOTELES** group, by means of which the actions and behaviour must be governed, encouraging the good actions of Managers, Employees and Customers.

Likewise, this **Ethical Code** will be applicable to all those Interest Groups, such as suppliers, tenants, businesses and neighbours in the area, among others, who may have a significant influence on the **ML HOTELES** group or who may be influenced by it, to the extent that this Code can be applied and made effective.

At **ML HOTELES** we are aware of the scope and impact that we can have on the population, as a company dedicated to tourism, hundreds of people use our facilities throughout the year. Therefore, we are responsible for contributing to the improvement of society, assuming commitments in favour of quality and customer satisfaction.

3. SCOPE

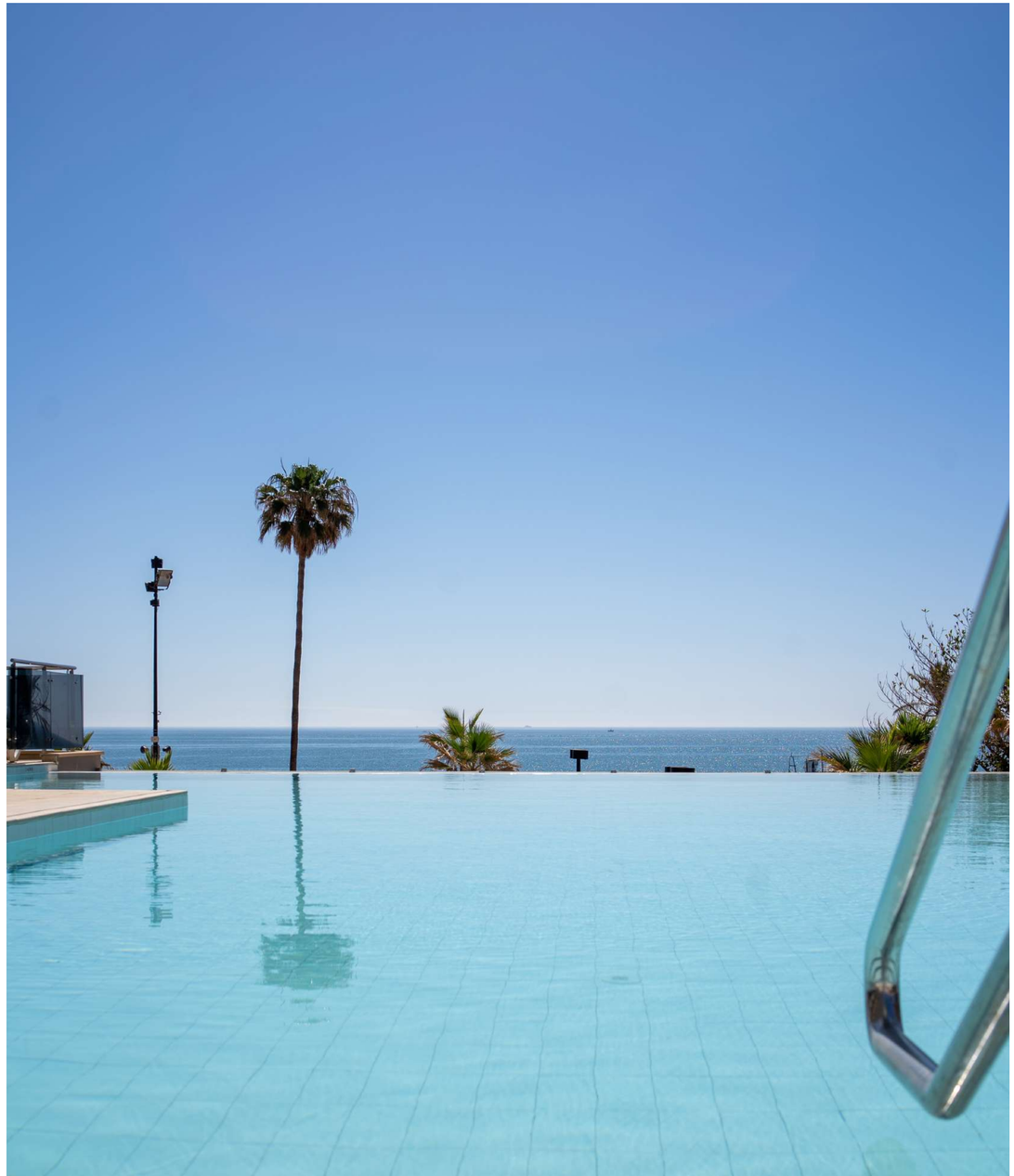
The **Ethical Code** is a guide of values and general principles that we must follow regardless of our position or function in the organisation. This code affects and applies to the entire **ML HOTELES** group and binds the following individuals or legal entities:

- Managers of **ML HOTELES** and Heads of the different Departments of the company, regardless of the type of contract that determines the employment or commercial relationship.
- Other employees of **ML HOTELES**, including internship students.
- Customers
- Suppliers
- Tenants of commercial premises
- Neighbours

It should be noted that this **Ethical Code** does not replace or override other regulations, provisions or laws in force, or other internal company regulations in relation to the activities carried out in the **ML HOTELES** group.

4. FRAMEWORK FOR THE DEVELOPMENT OF THE **ETHICAL CODE**

The **ML HOTELES** group currently consists of two hotels: Hotel Angela and Hotel Yaramar, located in the Paseo Marítimo (promenade) in Fuengirola. In addition, Hotel Yaramar has a Beach Club on the beachfront. In all our establishments the same corporate and ethical policies are developed based on the values that guide our activities.



4. MARCO DE DESARROLLO DEL **CÓDIGO ÉTICO**

Principio 1: "Businesses should support and respect the protection of internationally proclaimed human rights".

Principio 2: "Businesses should make sure that they are not complicit in human rights abuses".

Principio 3: "Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining".

Principio 4: "Businesses should uphold the elimination of all forms of forced and compulsory labour".

Principio 5: "Businesses should uphold the effective abolition of child labour".

Principio 6: "Busisesses should uphold the elimination of discrimination in respect of employment and occupation".

Principio 7: "Businesses should support a precautionary approach to environmental challenges".

Principio 8: "Businesses should undertake initiatives to promote greater environmetal responsability".

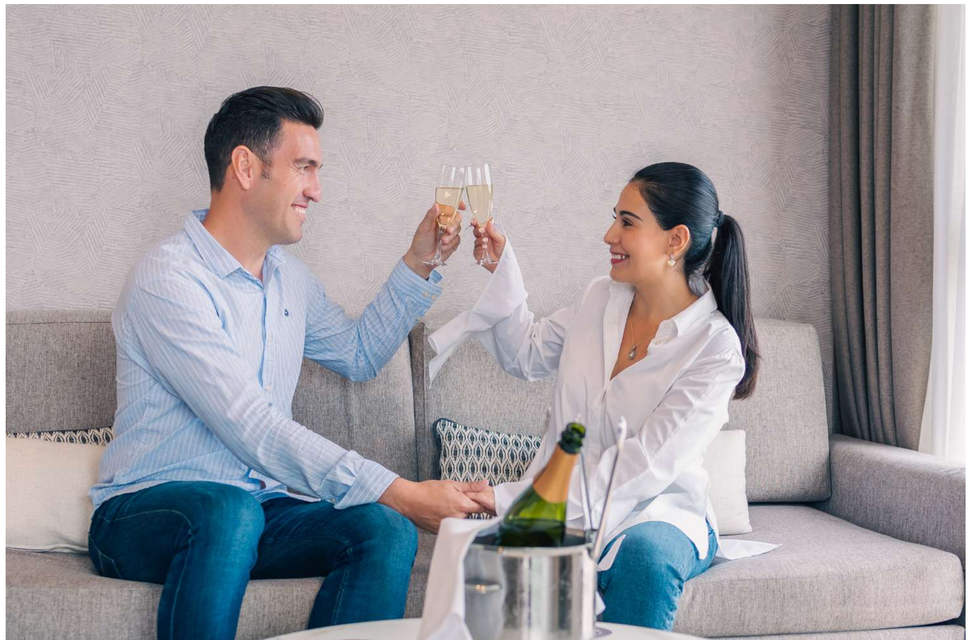
Principio 9: "Businesses should encourege the development and diffusion of environmentally friendly technologies".

Principio 10: "Businesses should work against corruption in all its forms, including extortion and bribery".

4.1 **MISSION AND VISION** OF THE COMPANY

MISSION

Our raison d'être is to provide all our customers with a unique and unforgettable experience, thanks to our wide range of quality services and our excellent staff. **All of this with sustainability as a transversal axis of the activity.**



VISION

The company's aim is to maintain continuous improvement in terms of service provision, to continue to position itself as a benchmark for tourism on the Costa del Sol. **Work-life balance, sustainability and digitalisation will be the three main pillars on this path.**

4.2 COMPANY **VALUES**

Mutual commitment

Always putting ourselves in the place of customers and employees, thus achieving a pleasant working environment that helps us to meet all efficiency objectives.

Sustainability

Carrying out our activity following standards of good governance, respect for the environment and social sensitivity.

Ethics

Always seeking to act responsibly and without any form of discrimination, both internally and externally, with a high commitment from the Management.

Continuous Improvement

Committed to the constant search for excellence and improvement in all our operations and services, fostering a culture of continuous learning and development to achieve maximum satisfaction of both our customers and our employees.

Hospitality

Offering a warm, friendly, and welcoming treatment to our customers, so that they feel at home during their stay.

Creativity

Trying to innovate and keep the company well positioned in the sector, to offer a service in line with market demands.

5. BEHAVIOUR AND COMMITMENTS IN RELATION TO **STAKEHOLDERS**

This **Ethical Code** must be applied to all natural or legal persons involved in **ML HOTELS** and to all activities and places of operation. It should serve as a frame of reference for the principles and values on which the activity of the hotels is carried out.

Managers and Heads of the different departments have the obligation to communicate the Code to their work teams and, by setting a good example, to lead compliance with it. They must serve as support in any moment of doubt and, if necessary, correct and report any non-compliance.

The rest of the stakeholders involved are obliged to be aware of the **Ethical Code** and make their own decisions in accordance with it. They must also report any incidents that go against the **code.**

5. BEHAVIORS AND COMMITMENTS IN RELATION TO **STAKEHOLDERS**

GENERAL PRINCIPLES

The two principles set out below apply to all parties involved with **ML HOTELES.**

RESPECT FOR THE LAW

All parties related to **ML HOTELES** must know and comply with the laws in force, nacional, regional, local or international, related to the development of the activity they perform, as well as comply with the internal rules and procedures established by the company and, finally, freely assume and accept the values and principles contained in the **Ethical Code** of the company, refraining from practices that are or are suspected to be illegal, unethical or that may damage the reputation of **ML HOTELES.**

CONFIDENCIALITY AND DATA PROTECTION

Due care must be taken to ensure the confidentiality and protection of data and any other information of all entities and persons who are parties to or exchange information with **ML HOTELES**, during and after the relationship.

5.1 OWNERS AND MANAGEMENT

Honesty, Transparency And Trust

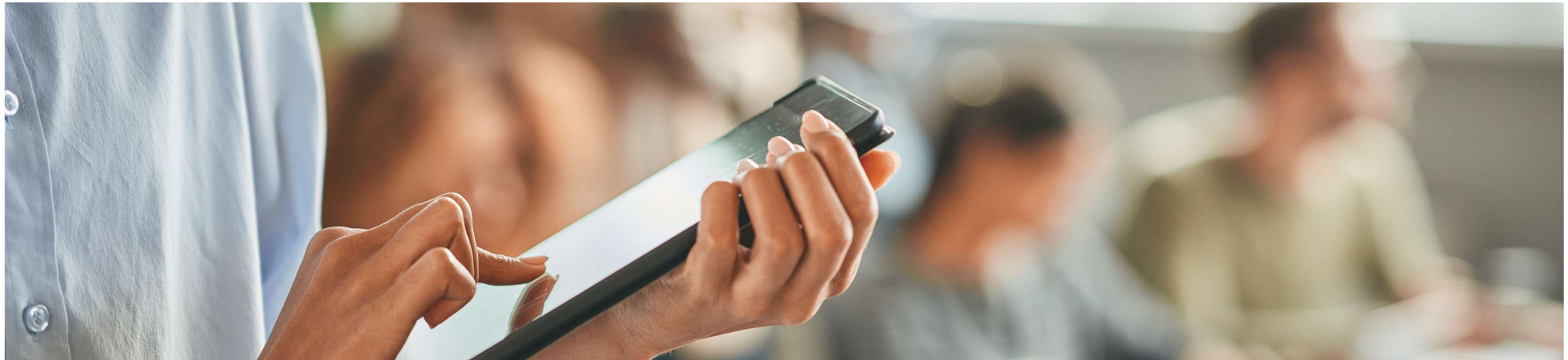
Owners and managers must establish good management practices, being transparent and honest with all parties related to the company. They must also take care to protect confidential company information that has been entrusted to them, as well as uphold data protection related to customers, employees, suppliers, and others, duringand after the relationship with them.

Integrity

The owners and managers of **ML HOTELES** must act with integrity, in other words, they will adopt the present **Ethical Code** and reject any conduct that implies corruption, dishonesty or disrespect. They must not accept incentives that may influence decision-making that affects the company, nor must they seek to benefit themselves or third parties through the improper use of their position.

Efficiency in management

It is the responsibility of the owners and managers of **ML HOTELES** to act efficiently in the management and handling of resources, implementing actions that lead to an optimal development of these without diminishing the quality of the services provided in the company. They must also take care of the maintenance of the infrastructure and equipment belonging to **ML HOTELES.**

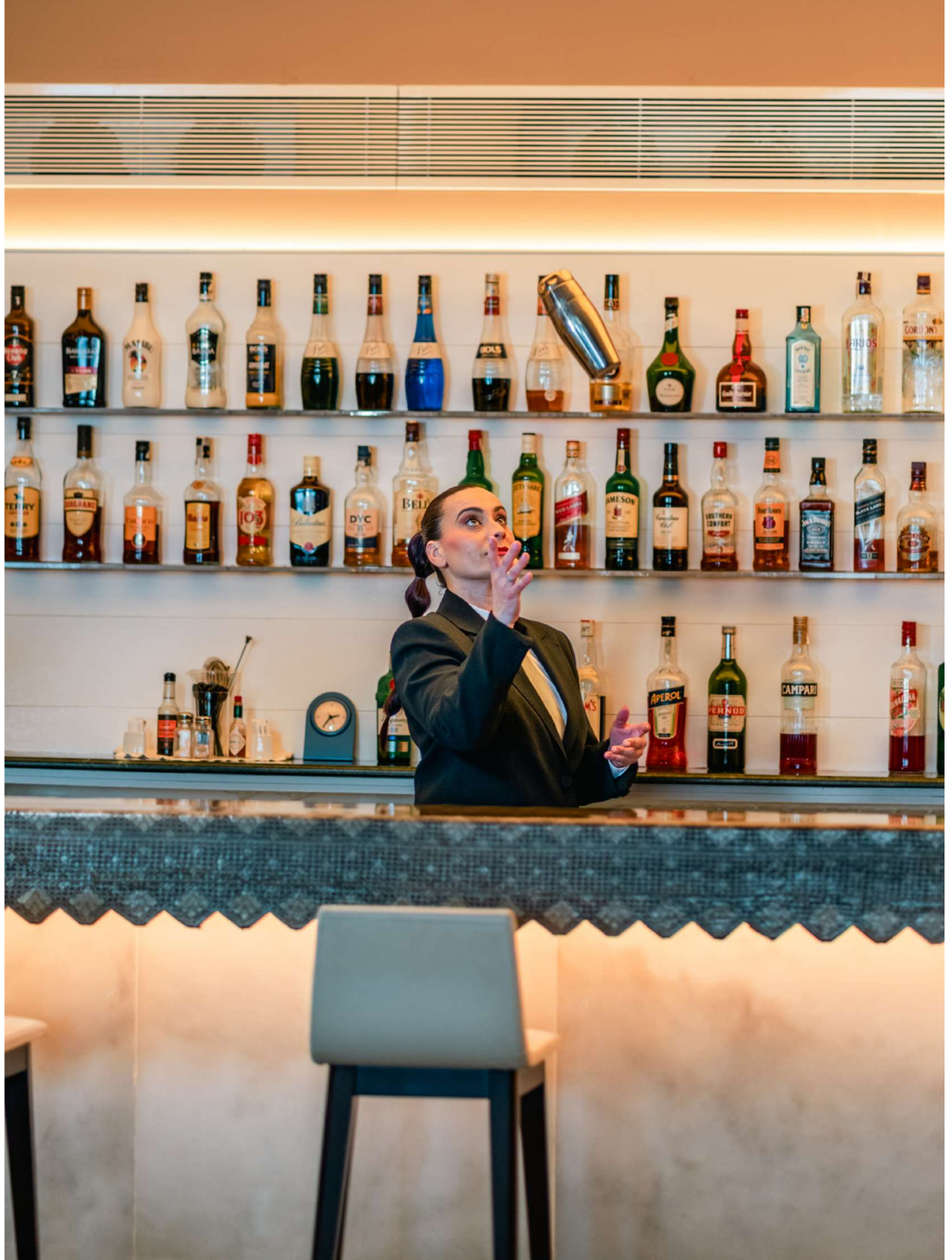


5.2 TENANTS

ML HOTELES has 5 properties rented to third parties, which are: a restaurant, a hairdressing salon, a car rental office, a cafe and an ice cream parlour. The ethical principles to be followed with these parties are:

DIALOGUE, TRUST Y COOPERATION

A healthy relationship should be built between all parties, promoting good dialogue, trust, and cooperation in order to develop an optimal environment that allows freedom of expression and the proper development of the work of each one, sharing the capabilities of all in order to create a better position in the market.



5.3 STAFF

At **ML HOTELES** we seek to promote an optimal working environment that encourages professional and personal development, taking into account the different skills and experiences of its employees, as well as the integration of different cultures.

RESPONSIBILITY

All decisions taken must be honest and responsible, following and respecting the applicable rules and procedures, as well as the values of the company. Employees undertake not to copy, reproduce, counterfeit, use or share credit or debit cards to which they have access in the course of their work.

DIALOGUE AND TRUST

At **ML HOTELES** we want to build good relationships through dialogue and trust among all staff, always starting from respect for everyone, encouraging the creation of an environment that allows everyone to feel comfortable and to express themselves freely while carrying out their work. Any behaviour that creates an intimidating or offensive working environment should be avoided.

5.3 STAFF

RESPECT

At **ML HOTELS** we ask our employees not to carry out practices of discrimination, harassment or intimidation and we encourage them not to tolerate these acts, respecting and demanding respect in labour relations. They should not discriminate or allow others to be discriminated against based on gender, race, nationality, religion, sexual orientation, language, political ideology, or any other characteristic. Harassment, whether sexual, workplace or personal, should always be avoided

EQUALITY AND WORK-L IFE BALANCE

In this company we work to ensure that there is no possible discrimination gap by creating an environment of equal opportunities for all our employees. We currently have an **Equality Plan** in place in the company. We also seek to promote the reconciliation of work, personal and family life for each of our employees, through the work-life balance management system.

PROFESSIONAL DEVELOPMENT

The selection and promotion process at **ML HOTELES** is based on the qualification and professional capacity of the candidates for the job in question and must be carried out in an objective manner. We are also committed to the personal and professional development of our employees by encouraging their involvement in the improvement of their own skills and experiences. **ML HOTELES** offers fair and competitive salaries.

HEALTH AND SAFETYD

ML HOTELES guarantees a safe and healthy workplace by adopting measures to maximise the prevention of occupational risks, complying with the regulations, and providing the necessary means for employees to carry out their activities with the appropriate health and safety measures. Employees shall be responsible for maintaining their workplace in accordance with the health and safety practices established by current legislation and by the company. The consumption of alcoholic beverages or any other illegal substance during working hours is prohibited, as is going to work under the influence of such substances.

5.4 CUSTOMERS

CUSTOMER ORIENTATION

For **ML HOTELES** the customers who visit us are our raison d'être. Therefore, we consider their satisfaction as a priority through the application of processes that implement transparency and integrity and guarantee the quality of service, offering quality products, services and offers with clear and truthful information. Finally, it is worth mentioning that the company offers advice to customers in case they require it, guaranteeing data protection.

COMMUNICATIONS, ADVERTISING AND MARKETING

The activity of **ML HOTELES** is based on the understanding of our clients and their needs, which is why it is guaranteed that all marketing and publicity actions to commercialise the products and services offered contain reliable, truthful, clear and useful information. In addition to this, it is verified that these services and products comply with each of the advertised specifications.

OPTIMAL ENVIRONMENT

ML HOTELES provides a quality environment for all customers, creating an attractive, clean, and safe place for them to enjoy our facilities and services. An atmosphere of respect and harmony must also be created among the customers themselves and between customers and employees.

5.5 BUSINESSES AND NEIGHBOURS IN THE AREA

SAFE ENV IRONMENT

ML HOTELES is committed to ensuring that the development of its activities guarantees a safe environment, minimising any negative impact that may affect businesses and neighbours in the area.

COMMUNITY INTEGRATION

The company wishes to collaborate with the businesses and neighbours in the area by listening to their suggestions and comments through a continuous and respectful dialogue. It is intended that the development of the hotel activity will lead to a better relationship and mutual benefit

5.6 SUPPLIERS

PURCHASING POLICY

ML HOTELES selects its suppliers incorporating ethical, social, economic, andenvironmental criteria, choosing those who, apart from offering the best negotiation conditions, share the company's ethical principles and commitments, avoiding negotiations with suppliers who may be involved in unethical or illegal conduct or behaviour. All suppliers chosen by **ML HOTELES** must comply with current regulations.

FAIR RELATIONSH IPS, COMMITMENT AND RESPECT

Suppliers are important to us, as they contribute to the development of the activities carried out at **ML HOTELS**. For this reason, we are committed to behaving ethically, promoting, and sharing with these suppliers the principles contained in this code. Mutual respect will be promoted and the commitment to payments will be fulfilled by making them in a timely and agreed manner.

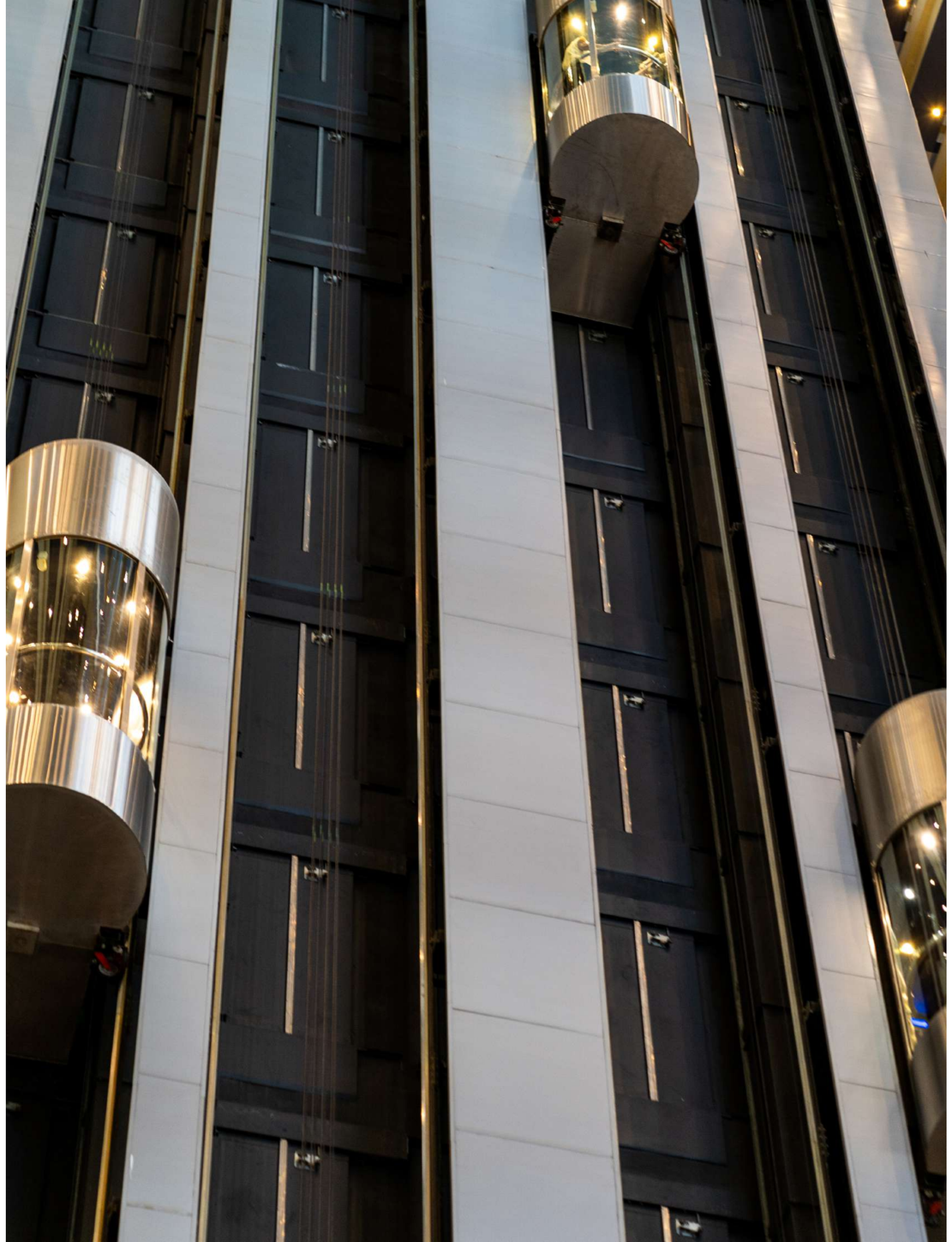
CONFIDENCIALITY

ML HOTELES takes care of the information shared by our suppliers and external contractors in a confidential manner, based on a relationship of trust and security between both parties.

5.7 MEDIA

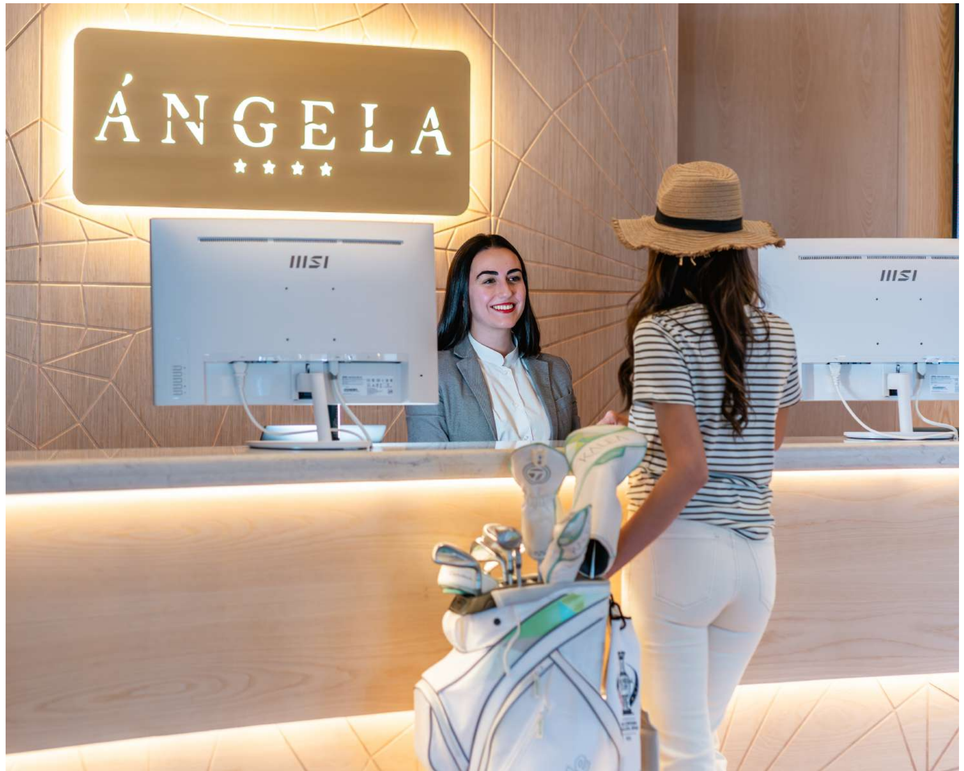
If it is considered that any of the professional actions may have repercussions in the media or if any of the employees are attacked by the media regarding their professional actions, the superior must be informed immediately.

Before publishing or sharing any information or opinion or participating in a public event as a representative of **ML HOTELES**, the superior must be informed. And when these statements are made, they must be made in a responsible and respectful manner, following the company's guidelines, and always respecting the confidentiality of the company's information, customers, employees, suppliers, and other parties involved with the company.



6. BEHAVIOURS AND COMMITMENTS IN RELATION TO **RELEVANT ISSUES**

At **ML HOTELES** we are committed to ensuring that our actions contribute to the progress and sustainable development of society. For this reason, please find here a list of the commitments made by the company in relation toissues relevant to our community.



6.1 HUMAN RIGHTS

At **ML HOTELES** we recognise Human Rights as fundamental and universal rights and we are committed to respecting, promoting, and defending international agreements, current regulations, and other related principles.

We have developed a **Human Resources Policy** as a sign of sensitivity to the needs, human rights and welfare of our employees to ensure that everyone has good working conditions and that each of their rights are respected.

Furthermore, we reject any conduct that implies the violation of these rights, as relations between all natural or legal persons who are part of and related to the company must be based on respect for the dignity and equality of each person.

Finally, at **ML HOTELES** we are committed to collaborating with the **United Nations Global Compact** by complying with the principles that regulate it and inviting other companies that collaborate with us to adhere to it.

6.2 ENVIRONMENT

At ML HOTELES we are committed to developing our activities as a hotel establishment always respecting the environment and minimising the impact that our actions may have on the ecosystems that surround us.

To this end, we have developed our own Environmental Policy, which serves as a reference framework for establishing environmental objectives and is applied to all areas and activities related to the company.

ENVIRONMENTAL IMPACT

In this company we ensure that we comply with all applicable environmental laws and regulations. We want to contribute to environmental sustainability by identifying negative impacts and developing actions and measures to reduce them, especially greenhouse gas emissions.

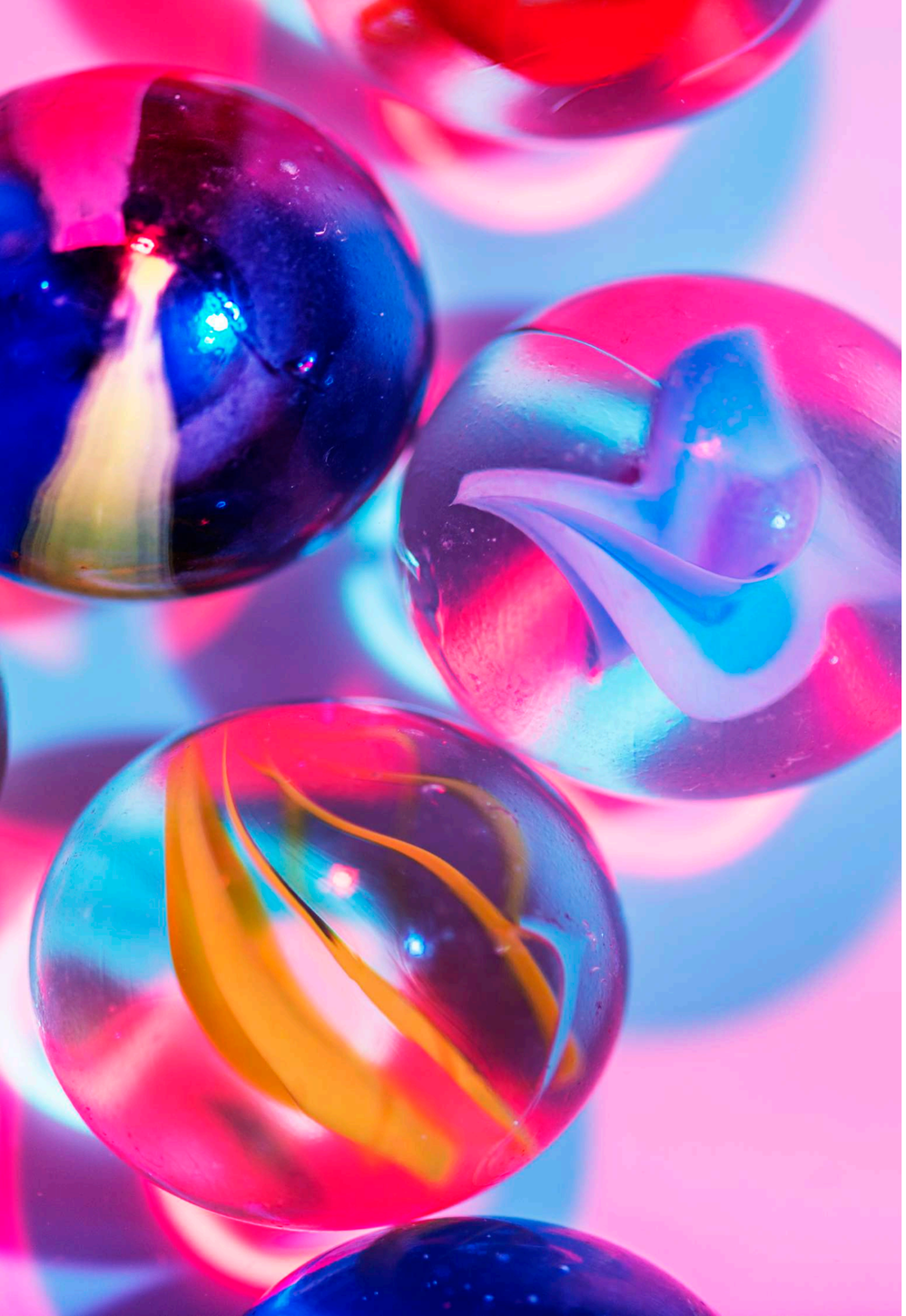
ML HOTELS is committed to educating all staff on environmental issues so that they understand their role in achieving our objectives and we invite our customers to support our efforts to reduce environmental impacts.

RESOURCE CONSUMPTION

We work to reduce resource consumption by developing good management practices. For example, we reduce water and energy consumption by installing more efficient systems or introducing energy-efficient alternatives in our purchasing procedures. We also reduce the use of potentially harmful chemicals in our operations by seeking biodegradable or natural alternatives and installing dispensers.

RECYCLING

At **ML HOTELS** we apply the 3R rule: reduce, reuse and recycle, in order to reduce the volume of waste we send to landfill.



6.3 EQUALITY AND DIVERSITY

We are a company that is aware of the diversity that exists in our society. Therefore, we wish to cater on equal terms for the different profiles of both the people who work and collaborate with our company and our customers, promoting an environment based on the principle of equality.

6.4 LOCAL COMMUNITY

ML HOTELES is an entity integrated in the local community and we feel obliged to contribute to the improvement and well-being of the social environment where we are located, generating opportunities for economic and social development. Through our Local Community Policy, we assume the responsibility we have for our impact on the community.

SUPPORT TO LOCAL SERVICES

At **ML HOTELS** we want to ensure our respect for the culture, traditions, and intellectual property rights of the local population. We encourage our guests to explore our local food, history, culture, and traditions. We are also committed to purchasing goods and services from local suppliers.

TAX COMPLIANCE

The **ML HOTELES** group assumes and expresses its commitment to accounting, tax, and social security obligations, and rejects any form of fraud towards the different Public Treasuries and Social Security bodies.

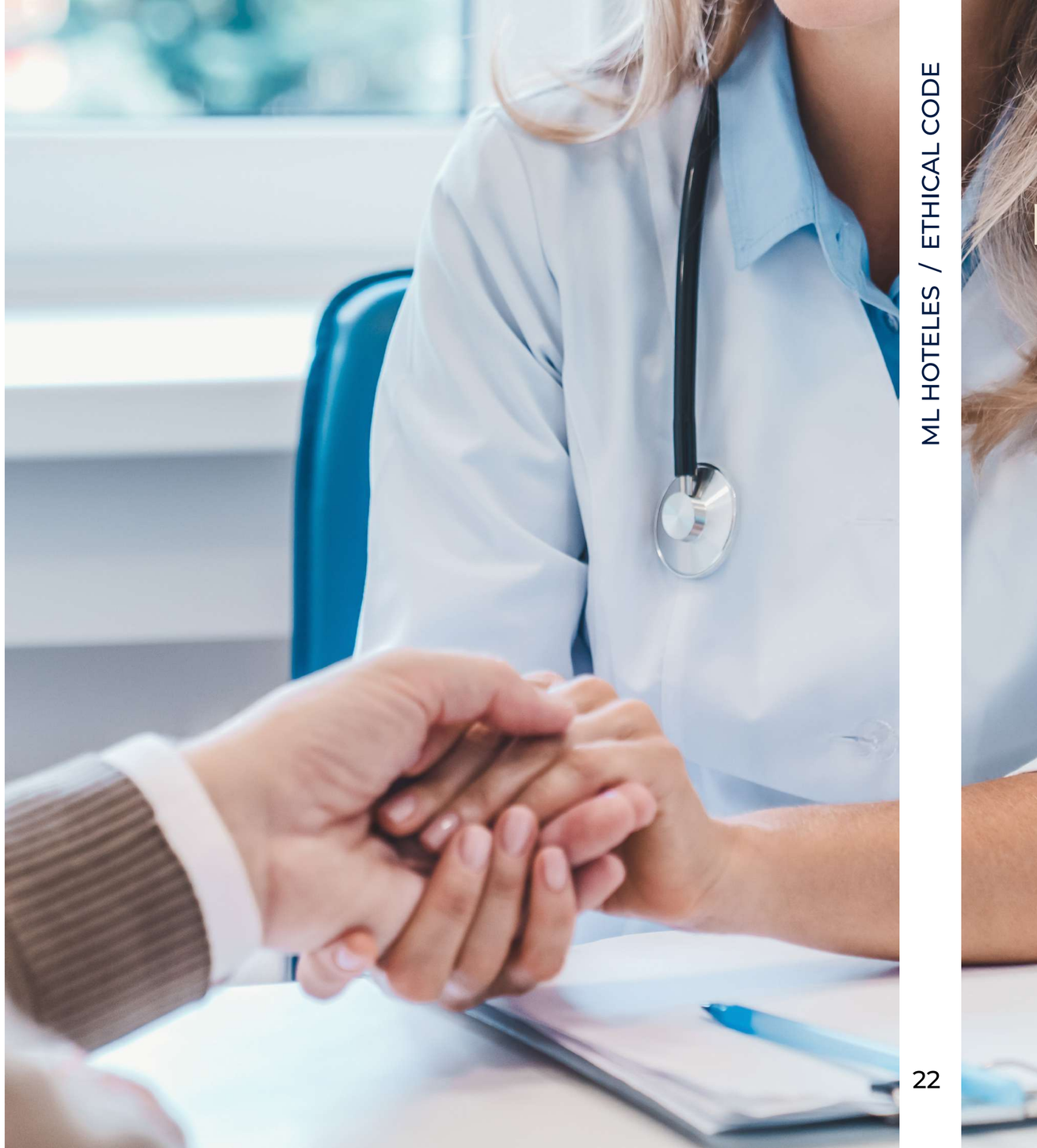
6.5 QUALITY AND PROCESS MANAGEMENT

At **ML HOTELES** we consider Quality to be of paramount importance to our company because we value our clients and strive to provide them with services that meet and even exceed their expectations. We know that a quality offer means constant training and innovation, in accordance with our commitment to continuous improvement.

We maintain procedures for the management of our customers' compliments, complaints, and suggestions, as their opinion is essential to us.

6.6 HEALTH AND SAFETY

At **ML HOTELES** we are aware of the importance of the **Health and Safety** of our employees, so we want to offer them a healthy and safe working environment. We are committed to complying with current and applicable legislation on the prevention of occupational hazards and to protect and maintain the physical and mental health of all employees.



7. DISSEMINATION OF THE **ETHICAL CODE** ÉTICO

DISSEMINATION

At **ML HOTELES** we guarantee that the appropriate measures will be taken for the full dissemination of the **Ethical Code** to all interested parties, so that they are aware of it, understand it and become familiar with the values, principles and commitments set out in it. All **ML HOTELES** employees, Managers and other interested parties must accept and accept this Code.

The Quality, Environmental, Health and Safety department will be responsible for the dissemination of this **Code** to all interested parties. It will be published on our website in the Sustainability and Corporate Social Responsibility section.

8. VALIDITY AND UPDATING OF THE ETHICAL CODE

This **Ethical Code** is valid from the date of its approval by the **Management, which took place on the 7th May 2024.**

Any possible updates that may be made to it shall be approved by the Management

9. BREACHES OF THE ETHICAL CODE

In the event of incidents and breaches of the **Ethical Code**, they must be reported and notified through the Complaints Channel available on the website of each hotel.

To accept and consider the report as valid, it is required to provide the identification data of the claimant, arguments, or evidence to support the complaint and the person or group reported. The company ensures the total confidentiality of the complaints.

It should be noted that these reports must be truthful and made in good faith and not based on mere supposition or speculation. The use of this channel to make false allegations may lead to disciplinary action being taken and, if necessary, legal action being taken by **ML HOTELES**.

ML HOTELES

HOTEL
YARAMAR
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HOTEL
ÁNGELA
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