Qubus Hotel[®]



CODE OF CONDUCT

QUBUS HOTEL HOLDING SP. Z O.O.

Qubus Hotel[®]







These guidelines (code of conduct) are applicable also for any fully owned subsidiary of Caiano AS with address Strandgata 92, Haugesund.

also apply to any wholly owned subsidiary.

- 1. The Code of Conduct reflects our values, that are long-term, openness, hard work and trust
- 2.Caiano`s vision is to create lasting values in a respectable, responsible and good manner
- 3. We will adhere to applicable laws and regulations behaving in an ethical, sustainable and responsible manner.
- 4. The Code of Conduct does not take away from the fact that you need to make good assessments when dealing with ethical dilemmas.
- 5.Our guidelines (Code of Conduct) are approved by the board of Caiano AS.

YOUR RESPONSIBILITY

We expect anyone acting on behalf of Caiano to have high ethical standards.

- 1. Familiarise yourself with the Code of Conduct, and laws and regulations applicable for your work and act within and according to these.
- 2. If in doubt, then ask your leader and be open about any ethical question.
- 3. All employees shall loyally act in accordance with our Code of Conduct

EQUALITY, DIVERSITY AND INCLUSION

• Caiano`s working environment shall be based on diversity and inclusion.

• Discrimination based on race, gender, age, sexual orientation, religion or political opinion, ethnisity or other compromising the principle of equality is unacceptable.

• Treat each other with fairness, dignity and respect.

HARASSMENT AND

• Treat everyone you are in contact with regarding your work or workrelated activities with courtesy and respect.

• Any form of harassment or actions that can reasonably be viewed as offensive or intimidating, including any form of unwanted sexual attention is unacceptable.

SAFETY AND SECURITY

• Caiano`s safety and security vision is zero harm/accidents

• Safety and security is everyone`s responsibility

• Familiarise yourself with your responsibility and contribute to a safe and secure working environment. Familiarise yourself with procedures relevant for your work.

• Stop work immediately if you consider it unsafe.

• Report any incident or unsafe condition to your leader and follow the requirements

applicable for the business/work.

PRIVACY AND DATA PROTECTION

• Privacy and data protection laws (GDPR) protects the integrity and confidentiality of a person`s private information.

• Privacy is a human right and it is important to protect this value.

• Respect everyone `s privacy

• We have a quality system for privacy and date protection. Familiarise yourself with this and make sure that you have sufficient knowledge of this and follow the guidelines for processing of personal data.

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DRUGS AND ALCOHOL

Caiano is a drug and alcohol-free workplace. We will not tolerate anyone being under the influence of drugs or alcohol at work for Caiano. Limited amount of alcohol may, however, be consumed when local custom and occasion make it appropriate, and provided consumption is not combined with operating machinery, driving or any other incompatible activity.

Tests for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable laws.

In practice this can be summarized as follows:

 Do not work when under the influence of drugs or alcohol
Be conscious about work-related events where alcohol is served and show moderation.

ANTI-CORRUPTION

Caiano has zero tolerance for corruption in any form, like bribery or offering or accepting any other form of improper advantage.

CONFLICT OF

• Emloyees shall not have business activity or other paid work without informing Caiano in

writing in advance, as Caiano might in certain cases be able to require the employee to not do this whilst working for Caiano.

• Ensure that you have necessary approval before accepting directorship for another company.

• Always look after Caiano`s interests when representing Caiano.

• You should avoid situations of actual or potential conflict of interest, and situations that the outside world might perceive as a conflict of interest.

• Be open with your leader regarding this.

INTERNATIONAL TRADE RESTRICTIONS (SANCTIONS)

Check if there are applicable sanctions that the company therefore must comply with.

ANTI-MONEY LAUNDERING

• Know your business partners and comply with applicable laws and regulations regarding Anti-Money Laundering

• Be attentive of any unusual payments, invoices and bank arrangements.

CONFIDENTIALITY

Familiarise yourself with the extent and content of your duty not to disclose confidential information. Remember that this applies also after the end of employment/work.

EXTERNAL COMMUNICATION AND MEDIA RELATIONS

• Questions from the media shall be directed to the general manager, unless the general manager has given others authority.

• Make sure you have the proper authority to communicate externally or to the media before you do so.

• If you use social media, use good judgement and show respect for colleagues, business partners and the community we are part of.



Date of approval of these guidelines/Code of Conduct: 31 March 2022.