

BOTANIA
RELAIS & SPA

THE CODE OF ETHICS

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PREMISE

The Botania Relais & Spa is a tourist complex aimed at high-end hospitality, born from the love of the property for the island of Ischia and which has strongly believed in its potential by masterfully combining traditions, values, respect for the environment and innovation. The idea was to create a large garden where guests can find peace and relax surrounded by unspoiled nature, which is preserved with a view to eco-sustainable activities. Staying at the Botania Relais & Spa is an experience of perfumes, flavors and colours. In this context, the property intends to underline the ethical value that environmental protection and the culture of hospitality have, not only for the island but also for the future of the new generations, clearly defining the set of values in which it believes and which it shares with its team, together with the responsibilities it assumes both internally and externally. This document (The Code of Ethics) is a fundamental tool in the field of dissemination and clarification of corporate principles.

INTRODUCTION

For the Botania Relais & SPA, business ethics are configured as the ability to integrate its business activities with respect and protection of the interests of all partners and all individuals with whom it relates, with the protection of environmental resources and their preservation for future generations. The primary objective of the adopted Ethical Code is to make the values in which the ownership and its team recognize themselves at all levels common and widespread, ensuring that anyone called to make a decision clearly remembers that at stake are respect for the environment, for people, protection of energy sources, as well as the reduction of consumption. All of this must be a *modus operandi* that is part of the corporate culture.

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PURPOSE AND SCOPE OF APPLICATION

1.1 Purpose

The main purpose of the Code is to make the values in which the Botania Relais & Spa recognizes itself common and widespread, so that everyone within the company, in making a decision, has a guide to follow and act keeping in mind not only their own rights and duties but also those of others.

1.2 Scope of application

The Code applies to all employees of the Botania Relais & Spa, as well as to all business of the Botania Relais & Spa or in which the Hotel has an interest and to Third Party recipients, meaning Third Party recipients, subjects external to the Company who operate, directly or indirectly, for the Botania Relais & Spa (collaborators, consultants, agents, suppliers or commercial partners).

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OUR COMMITMENT

Our commitment is to offer a highly professional service in terms of eco-sustainability.

People, whether they are company employees, suppliers or customers, are the main and constant point of reference for everything that is an excellent result we aim for.

The people on our team represent our most important intangible capital. The ownership of the Botania Relais & SPA recognizes a fundamental value in the diversity of cultures and talents and wants to attract and grow people with leadership skills, passion for their work and intellectual curiosity that drives them to always give their best.

Consistency, transparency and respect must guide every decision/behavior in a context of mutual trust and interdependence.

03

BASIC VALUES

3.1 Centrality of the person - Diversity and Inclusion

In carrying out their work, all those who operate on behalf of the Botania Relais & Spa act in full respect of the physical, psychological, cultural and moral integrity of people. From this point of view, diversity is a fundamental value and we believe that promoting inclusion can be a source of competitive advantage, creating a more motivated workforce for the adoption of the best decisions, based on a deep understanding of our customers' needs.

The Botania Relais & SPA doesn't tolerate any form of discrimination or exclusion regarding age, culture, ethnicity, nationality, religious belief, race, public opinion, marital status, pregnancy, gender and sexual orientation, gender identity and/or expression, health or disability.

3.2 Honesty and Transparency

Honesty represents the fundamental principle for all the activities of the Botania Relais & SPA. Relations with stakeholders at all levels are based on criteria and behaviors of correctness, consistency, loyalty and mutual respect.

The principle of correctness implies respect for rights, also in terms of privacy and equal opportunities, as well as the laws in force aimed at protecting the individual personality of all subjects who are professionally involved with the company.

The principle of transparency is based on the truthfulness, accuracy and completeness of information both inside and outside the hotel. In compliance with the principle of transparency, every corporate operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous. Inside the Botania Relais & Spa there is and should not be any secret but only Passion.

3.3 Efficiency

In every work activity, the economy of the management and use of company resources must be pursued, in compliance with the most advanced quality standards and environmental protection; paying particular attention to reducing the consumption of energy and water sources without lowering the standard of service.

3.4 Fair competition

The Botania Relais & Spa recognizes the value of competition when inspired by the principles of correctness, fair competition and transparency towards the operators present on the market, undertaking not to unduly damage the image of the Competitors and their products.

3.5 Sustainability

The Botania Relais & Spa recognizes the fundamental importance of safeguarding the environment in ensuring a better future for next generations. Consequently, the Hotel undertakes to safeguard the environment and to contribute to the sustainable development of the area, also through the use of the best technologies available and the constant monitoring of company processes, as well as the use of KM 0 products and procurement from local producers, saving water and energy resources.

The Botania Relais & Spa is sustainable because it offers its guests an unconventional and authentic experience. The property's commitment is to safeguard the abundance and beauty of what nature offers, with the aim of passing on to present and future generations its values and traditions that support the long-term development of human and environmental communities.

The Botania Relais & Spa undertakes at every stage of its action to apply criteria of caution and a preventive approach towards the environment and its biodiversity. It also undertakes to promote initiatives for greater corporate environmental responsibility and to develop the use of technology so as not to damage the environment.

3.6 Well-Being

The Botania Relais & Spa is committed to producing Well-Being. Anyone who works directly or indirectly with the Botania Relais & Spa must be happy, their Being must be satisfied. The success of the Botania Relais & Spa is not only linked to profit but also to the diffusion of well-being among guests and the community. Well-Being is having a positive experience both as an employee and as a guest.

HEALTH AND SAFETY IN THE WORKPLACE AND THE ENVIRONMENT

4.1 Health Protection

The Botania Relais & Spa is committed to ensuring a safe, healthy and productive work environment and pays particular attention to environmental issues; therefore doesn't accept any compromise in the field of health and safety protection of its employees and collaborators in the workplace and undertakes to adopt corporate strategies and techniques that reduce the typical risks of the activity carried out, and improve the environmental impact of its activity, in compliance with current legislation.

4.2 Safety and Environment

For this purpose, the Botania Relais & Spa undertakes to comply with the following principles:

- implementation of all the actions necessary to ensure compliance with and adaptation to the regulatory provisions in force on occupational safety and respect for the environment;
- communication and dissemination of information regarding the protection of workers' health, occupational safety and environmental protection to internal and external stakeholders;
- promotion of the use of the most advanced technologies to achieve high levels in the protection of workers' health, occupational safety and environmental protection;
- compliance with the laws on working hours;
- coinvolgere tutti i livelli dell'organizzazione aziendale e tutti i dipendenti assicurando che responsabilità e procedure operative siano definite con precisione, appropriatamente comunicate e chiaramente comprese.

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RELATIONS WITH STAKEHOLDERS

Relations with stakeholders, at all levels, must be based on criteria and conduct of absolute correctness, collaboration, loyalty and mutual respect.

The Botania Relais & SPA considers as its stakeholders: the property, collaborators, suppliers, customers, competitors, the public administration, the community, the local community and the mass media.

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RELATIONS WITH PUBLIC INSTITUTIONS

The Botania Relais & Spa pursues the objective of maximum integrity and correctness in relations with public institutions and, in general, with the Public Administration, including as regards the request and/or management of permits, authorisations, licenses and public disbursements, in order to ensure maximum clarity in institutional relations in harmony with the need for organizational and managerial autonomy typical of any economic operator.

The Botania Relais & Spa forbids its personnel from accepting, offering or promising, even indirectly, money, gifts, goods, services, benefits or favors in relation to relationships maintained with Public Officials or Public Service Officers, to influence their decisions, in view of more favorable treatment or undue performance or for any other purpose, including the performance of acts of their office.

BUSINESS MANAGEMENT

7.1 Local Compliance

The administrators, employees, collaborators and those who in any capacity operate on behalf of The Botania Relais & Spa are required to comply with the laws and regulations in force in Italy and those of the country where they carry out their activity on behalf of the Hotels.

7.2 Use of information and financial resources

Below are the behaviors that administrators, employees, collaborators and those who in any capacity operate on behalf of the Botania Relais & Spa are required to observe:

- it is not permitted to use confidential information relating to the company and its customers/suppliers for personal benefit;
- the knowledge and technical skills developed by the Botania Relais & Spa constitute an important resource that everyone must protect and not spread. The obligation of confidentiality indicated here remains even after the termination of the employment relationship or collaboration with the Hotel;
- the anti-money laundering legislation must always and in any case be observed;
- They must not finance and participate in any way in subversive and/or terrorist activities;
- They must manage personal and sensitive data in compliance with current regulations to ensure a high level of security in the selection and use of their information systems intended for the processing of personal data and confidential information.

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DILIGENCE AND FAIRNESS IN THE MANAGEMENT OF CONTRACTS

Contracts and work assignments must be performed in accordance with what has been consciously established by the parties. For correct management of contractual relationships, the Botania Relais & SPA undertakes not to exploit positions of dominance with respect to its counterparties and to guarantee broad and exhaustive information to all internal and external collaborators involved in the activities envisaged by the stipulated contracts.

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CONFLICT OF INTEREST AND COMPANY LOYALTY

The administrators, employees, collaborators and those who in any capacity operate on behalf of the Botania Relais & Spa, must carry out their work activities pursuing the objectives and interests of the company, avoiding being in conditions or activities that could be contrast with the latter.

In the event that Company personnel find themselves (or think they are) in a situation that represents or generates a possible conflict of interest, they must immediately report it to their direct supervisor.

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POLITICAL ACTIVITY

All hotel employees are free to have their own political ideas and to carry out political activities, having the duty to clarify that their opinions are exclusively individual and not expressed as a collaborator of the Hotel. All forms of political propaganda within the workplace are prohibited.

It is forbidden to use databases, corporate information, archives or anything else owned by the hotel to carry out political propaganda activities.

It is not permitted to donate company funds to parties or individual politicians and to comply with recommendations or requests for favors from politicians.



USE OF COMPANY ASSETS

The staff of the Botania Relais & Spa is required to use the assets and resources of the Hotel to which they access or have access to exclusively pursue the purposes and interests of the Hotel and not those of their own or of any third party. Any use of company assets and resources which is in conflict with the company's interests or which is dictated by personal and/or professional reasons unrelated to the employment relationship with the Botania Relais & Spa is prohibited.

The company provides its employees and collaborators with all the goods that are necessary to carry out their work and strictly prohibits the downloading or transmission of materials/messages with threatening, obscene, violent, illegal, immoral or inappropriate content.

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PROTECTION OF INFORMATION

The Botania Relais & SPA recognizes that digital intangible assets have acquired ever-increasing importance over time and considers information security and observance of the related principles of confidentiality, integrity and availability of data, as an integral part of its activities.

Therefore, the Hotel undertakes to protect its information systems from illegitimate access and unauthorized disclosure of the information processed, while ensuring full compliance with the applicable regulations on the protection of personal data and information security standards.

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MANAGEMENT OF INTERNATIONAL RELATIONS

The Botania Relais & Spa undertakes to ensure that all its relationships, including those of a commercial nature, with subjects operating at an international level, take place in full compliance with the laws and regulations in force. The goal is to avoid the dangers of committing or, in this case, a crime of a transnational nature.

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MANAGEMENT OF INTERNATIONAL RELATIONS

The Botania Relais & Spa undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disseminating it to the parties involved through specific and adequate communication activities.

In order for anyone to conform their behavior to those described in this document, the Hotel will ensure an adequate information/training program and continuous awareness of the values and ethical standards contained in the Code of Ethics.

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DISCIPLINARY MEASURES

The rules contained in this Code integrate the behavior that administrators, managers, employees, collaborators and those who in any capacity operate on behalf of the Botania Relais & Spa must observe as indicated in this Code.

The Botania Relais & Spa will sanction behaviors that are not compliant and consistent with the values and principles of this Code, reserving the widest possible protection of its interests according to the seriousness of the infringements committed in application of the company disciplinary system.



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