
Pandox Fair Play Code of Conduct

Pandox – Excellence in hotel ownership & operations



Pandox™

This Code of Conduct was adopted by the Board of Directors of
Pandox Aktiebolag (publ) (Reg. No. 556030-7885) on March 29, 2017.

Pandox Fair Play

Pandox's vision is to be a world-leading hotel property company offering specialist expertise in active ownership, management and development of hotel properties, and in hotel operations.

Being a leader means constantly creating sustainable value for a broad set of stakeholders while earning their respect and trust. This can only be achieved by doing the right things, and doing them right. Our values combined with our Code of Conduct enables us to achieve that.

Pandox wants to contribute to a sustainable society by taking financial, social and environmental responsibility. This Code of Conduct was created to facilitate us to work sustainable throughout our organisation.

At Pandox we care about each other, our guests and business partners as well as about the environment and the community. Sustainability is a natural and integrated part of Pandox's operations and is based on Pandox's corporate culture and values based on fair play. That is why we call our sustainability work Pandox Fair Play.

Because we care.

Anders Nissen
CEO, Pandox AB



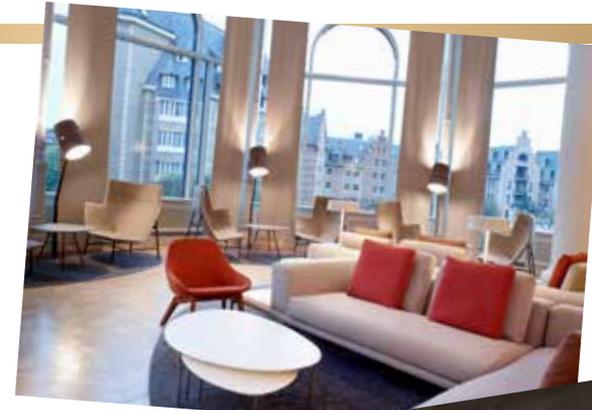
Pandox Fair Play Code of Conduct

Pandox Fair Play Code of Conduct (hereafter called “the Code”) lays the foundation for a common approach among Pandox coworkers regarding our values and our ambition to work sustainable. The Code describes the guiding principles and expectations we have on each other, and summarises our approach as employees, employer, business partner and member of the community. All Pandox coworkers are expected to comply with the guidelines in this Code.

The Code is based on our values – Fair Play – and on our five sustainability focus areas: Ourselves, Our Guests, The Environment, Our Business Partners and The Community. The Code is also built on the ten principles in the UN Global Compact.

www.unglobalcompact.org

We take a long-term approach and strive for long lasting relationships with employees, guests, business partners and other stakeholders. Through the Code, and by respecting good business ethics and sound business practises, we want to contribute to a sustainable society.



1. Human rights and work principles

Padox supports and respects international declarations and conventions regarding human rights.

1.1 OURSELVES

We care about each other, our guests and the people around us. We strive to create a positive and open atmosphere and a corporate culture based on trust, teamwork, pride and appreciation of our work.

- **Inclusion and diversity:** We strive for diversity and to provide equal employment terms for all coworkers. We shall treat everyone equally and with respect, regardless of ethnicity, national origin, skin colour, education, age, disability, sexual orientation, gender or religion.
- **Dignity and respect:** All coworkers shall be offered and have the right to a work environment free from discrimination, harassment, degrading treatment, punishment or threats.

Health, safety and security

We want to offer a healthy, safe and secure work environment in compliance with health and safety laws. We shall follow the safety procedures attributable to the respective roles and work responsibilities and remain alert to any risks in our daily work.

- **Work environment and safety:** We shall work proactively to improve our work environment and employee health. We shall offer regular safety training, that includes the correct use of safety equipment, and have the necessary routines in place to avoid accidents and work-related injuries.
- **Employee health:** The health and wellbeing of Padox coworkers is a priority. We are dedicated to ensuring that our coworkers have a good work environment and a healthy work-life balance. We encourage an active lifestyle and physical exercise. Through our own sports club, Padox Movement, our coworkers are encouraged to engage in physical activities.
- **Drugs and alcohol:** We perform our job safely and effectively and shall not use or privately distribute alcohol or any illegal drugs at work or while performing a work related activity. Alcohol consumption can occur at social events or at authorised representation events.
- **Integrity and data protection:** We shall respect the right of our coworkers to personal integrity and data protection. Personal data is to be handled according to relevant legislation, is only to be used in necessary, work-

related contexts and is to be protected from misuse to avoid individuals being harmed or being mistreated.

Working conditions

All Padox coworkers are expected to contribute to a fair and positive work environment. We shall always respect international conventions and declarations regarding human rights and treat each other fairly, equally and with respect for every individual's worth. We shall also offer a workplace free from discrimination and all forms of forced labour and encourage diversity within our teams and appreciate creativity, innovation and enterprise.

- **Employment:** All Padox coworkers shall have a written employee contract, receive fair wage in line with the highest level of the statutory minimum wage or applicable industry standards, receive statutory employment benefits, have the right to statutory leave including sick leave and parental leave, and are not forced to work longer hours than stipulated in local laws.
- **Forced labour:** All work is to be carried out voluntarily. No form of forced labour or work linked to any form of duress or threat of punishment is permitted, and coworkers have the right to terminate their employment with reasonable notice. No Padox coworkers are to be forced



to deposit valuables or identity documents with their employer.

- **Discrimination:** There is to be no discrimination, whether in connection with recruitment, pay levels, training, promotion, termination or retirement. We shall treat our coworkers and business partners with dignity and respect, and provide a work environment free from harassment, bullying, assault or any form of degrading treatment.
- **Freedom of association:** We shall respect our employees' rights under local laws, including their right to join trade unions and to engage in collective negotiations without fear of punishment, threats or abuse.
- **Child labour:** Child labour is not permitted. We are responsible for documenting the age of our coworkers and are not to employ anyone who is under the minimum age as established in local laws, is under the age of 15 or is subject to compulsory school attendance.

High quality and expertise

We always strive to offer excellent guest experiences. We do this by ensuring that our coworkers are well skilled and are offered training on regular basis.

Business ethics and anti-corruption

We shall operate our business in compliance with applicable laws and support freedom of competition and good business ethics. No form of corruption, bribery, money laundering or improper restriction on competition is permitted.

- **Entertainment and gifts:** We shall not accept payment, gifts or other types of benefit from third parties that

could influence or call into question our impartiality in business decisions. It is not permitted to give, promise or offer a benefit to those who exercise authority or decide on public procurement.

- **Anti-corruption:** All laws and regulations are to be complied with to prevent bribery and corruption. We shall not (directly or indirectly) offer, provide, request or accept any form of inappropriate benefit or bribe to/from guests, suppliers, public officials or others.
- **Fair competition:** We shall not accept or provide any benefits or rewards that are contrary to applicable laws or established business practices for the purpose of winning contracts or securing business deals, or that in any other way provide an improper advantage. We support free and open markets with fair competition and shall operate our business in accordance with the competition laws in effect.
- **Conflict of interest:** We shall avoid situations where our credibility can be damaged or questioned. Situations where an individual's personal interests may be seen as being in conflict with Pandox's interests should be avoided and guidance should be sought in situations of uncertainty.
- **Protecting assets:** We shall not misuse any Pandox assets, such as stock, equipment, cash, intellectual property, computer systems or confidential information.
- **Prevention of money laundering:** We shall comply with national and international laws and regulations aimed at identifying, addressing and preventing money laundering, extortion, fraud and other related crimes.

- **Proactive and impartial communication:** Pandox's communication with the financial markets and media shall be timely, transparent, clear, accurate and of a high quality. The information we provide must always be in compliance with laws and rules that apply to external financial communication. Detailed instructions can be found in Pandox's Communication Policy.
- **Insider trading:** Coworkers who have insider information about Pandox must comply with our insider rules. Insider information is information that is not publicly known and that may impact Pandox's share price either positively or negatively. Detailed instructions can be found in Pandox's Insider Policy.
- **Accounting and reporting:** All financial transactions are to be reported in accordance with generally accepted accounting principles, and accounting records must present the nature of the transactions that have taken place in a correct and precise manner. Pandox is to issue financial reports in a timely manner to provide an accurate presentation of the company's accounts and financial performance. Detailed instructions can be found in Pandox's Finance Policy.
- **Social media:** All use of social media is to be handled responsibly without posing any risk to the Pandox brand and the company's reputation. No confidential information about Pandox as a company, our employees, guests, business partners or other stakeholders is to be published in social media channels. Detailed instructions can be found in Pandox's Guidelines for Social Media.

1.2 OUR GUESTS

At Padox we care about our guests, our coworkers and the people around us. We are passionate about delivering excellent guest experiences, and we treat our guests in a friendly, positive, professional and respectful manner.

- **Non-discrimination:** All our guests are to feel welcome at Padox hotels. No form of discrimination of our guests based on ethnicity and national origin, skin colour, education, disability, age, gender, sexual orientation or religion is allowed. Our hotels shall be equipped to enable access to public areas, guest rooms and sanitary areas to people with functional impairment.
- **Criminality, prostitution and trafficking:** We do not accept criminality or prostitution at our hotels and we ban any form of sexual exploitation of children. Suspicious activities are to be reported to hotel management. We cooperate with the police and local authorities to combat crime.

Integrity and information security

Confidential information regarding our guests or our business shall only be used for its intended purpose.

- **Integrity and information security:** We shall ensure confidentiality with respect to all information observed or received regarding our customers and hotel guests. Coworkers who have contact with our customers or hotel guests, directly or indirectly, must respect their integrity and ensure the confidentiality of their personal information. Under no circumstances are we to discuss or disclose information on our guests other than for the purpose of fulfilling our work duties. External dissemination of cus-

tomers information is strictly forbidden, with the exception of special circumstances, such as violations of the law or other similar situations.

- **Intellectual property and information security:** We shall protect confidential information and take steps to prevent loss, misuse, unauthorised access, alteration or disclosure, including inappropriate communication or publication of information to third parties. We shall only use our intellectual property, such as trade secrets, copyrights, patents and trademarks, as permitted by agreement, and may not misappropriate or infringe upon the intellectual property of others.
- **Data security:** We shall have technical and organisational safeguards in place, such as firewalls and password-protected systems, in accordance with applicable laws in the countries where we operate to protect our guests' personal data against illegal or unintentional destruction, accidental alteration or loss, and unauthorised access.

Health, safety and security

The health, safety and security of our guests are a priority for Padox. We shall operate our hotels in accordance with applicable workplace health and safety laws. Padox coworkers are expected to follow rules, policies and guidelines regarding health, safety and security in the areas where they work.

- Our coworkers are to be trained and provided with updated information and instructions on health, safety and security. The hotel managers are responsible for health and safety issues.

- Our coworkers shall have access to and be familiar with how to use fire extinguishers, first aid kits and other relevant medical equipment.
- Our hotels shall have crisis management plans in place to be activated in case of emergencies such as injuries, illness, fire, terror threats, theft or other acute situations.
- Our hotels shall provide clear information to guests on evacuation routes, emergency exits and what to do in case of an emergency.
- Our hotels shall carry out regular maintenance of safety equipment and cooperate with external partners, such as the police force, fire brigade, security companies and safety consultants in matters concerning safety and security.
- Coworkers handling food and beverages shall follow the Hazard Analysis and Critical Control Point (HACCP) guidelines established by the Food and Agriculture Organization of the United Nations (FAO).



2. The Environment

We shall comply with environmental laws in effect. We are expected to follow the precautionary principle and strive to reduce our environmental impact. Our coworkers are to comply with Pandox's Environmental Policy, which is available on the Pandox website, www.pandox.se.



3. Our Business Partners

The Padox Fair Play Business Partner Code of Conduct sets out our guiding principles and the expectations we have on our partners. The Business Partner Code of Conduct establishes a common approach among our business partners and other stakeholders regarding Padox's values and ambition to do business sustainably. For more information about Padox Fair Play Business Partner Code of Conduct, see Padox's website www.padox.se.



4. The Community

Pandox wants to support community development in areas where we have specialist expertise. By working with others, we want to help create the necessary conditions for long-term sustainable development – in line with both our environmental and social responsibility. For more information about Pandox’s community initiatives, see our website www.pandox.se.



Follow-up and compliance

All coworkers are obliged to complete Pandox's online training regarding the Code, confirm that they have read and understood the Code and pledge to comply with the Code. It is also the responsibility of all coworkers to follow the guiding principles in the Code in their day-to-day work. Any violations are to be reported without delay.

All hotels and coworkers must comply with the laws and regulations that apply in the local markets where they operate and work. In the event of a conflict between the Code and local laws, the requirements and conditions that are at the highest level are to take precedence.

WHISTLEBLOWING SERVICE

The whistleblowing service is available for our coworkers and external stakeholders to report serious suspected deviations from our ethical guidelines as described in this Code.

We recommend our coworkers to first contact their team leader and/or manager. If that is not possible you can contact Pandox compliance manager by sending an email to fairplay@pandox.se. Furthermore, Pandox also offers a channel for anonymous reporting through an external partner, WhistleB, which can be accessed at the website below. For more information and guidelines about the whistleblowing service, please visit www.pandox.se/governance/code-of-conduct

<https://report.whistleb.com/Pandox>

