

# Ethical Code

hotel interski  
alpine serenity ★ ★ ★ ★

# Introduction

We are aware of the beauty and uniqueness of the locations and the environment in which we conduct our business. This is why we want to safeguard the area, working according to the Code of Ethics below, in an open and transparent manner. The desire to keep the natural and cultural heritage intact for future generations guides the conduct of our business.

The Code of Ethics contains the set of guidelines that the company, Hotel Interski, is committed to respecting and enforcing, representing a priority instrument of corporate ethics aimed at formalising the principles and standards of conduct in place and creating the conditions for the correct application of policies and procedures.

With this in mind, Hotel Interski has adopted this Code of Ethics, with the intention of combining the principles of sustainable development with the values of good corporate governance.

Since its creation, Hotel Interski has been carrying out its activities based on concepts of global well-being and eco-sustainability in full respect of the environment and the community. Our ambition to become a role model for sustainability in the hotel industry is evidenced by the far-sightedness that has guided us in the management of our company for over 30 years.

Date of approval:

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# 1. General Provisions

## **Art. 1 - Scope of application**

The provisions of this Code of Ethics express the fundamental principles that inspire the Company and also constitute exemplifying specifications of the general obligations of diligence, fairness and loyalty that qualify the performance of work services and conduct in the workplace. With the adoption of the Code of Ethics, an essential nucleus of values and principles is defined, already inherent in the company's actions, as fundamental rules of action for daily activities.

Its purpose is to ethically direct the Company's actions, and the principles and provisions contained therein are binding for the management and all those who work for the Company regardless of the nature of the relationship. The Code of Ethics is also brought to the attention of all third parties who receive assignments from the Company or have even temporary relations with it.

The addressees of this Code are therefore the Company's Directors, Employees and Collaborators of Hotel Interski.

The Company also undertakes to call for compliance with the provisions of this Code in all internal and external relations established.

## **Art. 2- General principles**

The Code of Ethics constitutes a set of principles whose observance is of fundamental importance for the regular operation, the reliability of management and the image of the Company. All operations, behaviour and relations within the Company and between third parties are governed by these principles.

Hotel Interski recognises the centrality of human resources and believes that an essential factor in the company's success is the professional contribution of the people who work for it. Human resources management is based on respect for the personality and professionalism of each individual, within a framework of loyalty and trust, firmly promoting and supporting the process of internal professional growth.

The Company's activities are carried out in full compliance with current environmental regulations and constantly seeking a balance between the performance of economic activities and the unavoidable environmental needs, in consideration of the rights of future generations.



### **Art. 3 – Communication and information**

Hotel Interski informs all Recipients on the provisions and application of the Code of Ethics, recommending its observance at every level. In particular, the Company will:

- Disseminate the Code of Ethics to the Addressees;
- Interpret and clarify the provisions it contains
- Verify its actual observance
- Revise and adapt the document if necessary;

### **Art. 4 - Responsibility**

Each Addressee carries out his or her work and duties with professional commitment and according to the principles of diligence, efficiency and fairness. They make the best possible use of the tools and time at their disposal, assuming the responsibilities associated with their roles. A serious and persistent breach of the rules of this Code damages the relationship of trust established with the company.

The Company has as an unavoidable principle the respect of the laws and regulations in force that the Addressees of the Code are required to comply with. Under no circumstances is it permitted to pursue or realise the Company's interest in violation of the law.

### **Art. 5 - Fairness and impartiality**

For Hotel Interski, fairness is expressed first and foremost through respect for human resources, both in terms of privacy and equal opportunities.

Fairness also means keeping the commitments agreed with one's interlocutors and stakeholders. With regard to relations within the Company, this means paying special attention to the physical and moral integrity of personnel, as well as eliminating any discrimination and any possible conflict between employees and the Company. Externally, on the other hand, it means maintaining relations marked by the utmost professionalism with customers, suppliers and other interlocutors.

All actions and operations carried out and the conduct of each of the Addressees in the performance of their duties or functions are inspired by transparency, fairness and mutual respect as well as legitimacy in both form and substance, in accordance with the laws in force and internal procedures, also in order to protect the company's assets and image.



## **Art. 6 - Efficiency**

The principle of efficiency requires the commitment of each individual to perform his or her work to the best of his or her ability by contributing, through his or her actions, to the good management of the company. In particular, this means

- guaranteeing and demanding high quality standards in terms of processes and results;
- efficiently using the resources necessary for the provision of services;
- enhancing and maintaining structures and infrastructures in good condition over time;
- ensuring compliance with contractual commitments with stakeholders and an adequate level of service.

## **Art. 7- Transparency**

The principle of transparency is based on truthfulness, accuracy, completeness and sharing of information at every organisational and communication level of the Company.

In the formulation of contracts with its customers, suppliers and other partners, the Company draws up clauses in a clear and comprehensible manner and is obliged to respect them.

## **Art. 8 - Human Resources Enhancement**

Respect for the person implies the observance and promotion of human rights, protecting the dignity and physical integrity of individuals, through impartiality in choices, guaranteeing safety in the workplace, adequate training and information, adopting ethical behaviour based on the principles of fairness and seriousness.

Human resources represent a fundamental factor for the Company's activity and development. We therefore promote the professional growth of our employees, with the aim of respecting their physical and moral integrity as a primary value.

All employees have the same opportunities to manifest their qualities and potential and to access professional growth and career paths, in a work environment in which personal characteristics are valued and political, religious, racial, linguistic or sexual diversity is not a prerequisite for discrimination or harassment of any kind.



## **Art. 9 - Relationship with stakeholders**

This Code is also intended to direct the Company's conduct towards cooperation and trust in its stakeholders, i.e. those categories of individuals, groups and institutions whose contribution is necessary for the realisation of the Company's mission and/or whose interests are directly or indirectly influenced by the activities carried out by Hotel Interski.

## **Art. 10 - Reputation**

Reputation and credibility are fundamental intangible assets. Good corporate reputation and credibility foster relations with local institutions, supplier reliability, customer loyalty and human resource development. In the performance of any business activity, unethical behaviour compromises the relationship of trust between the company and its stakeholders. By unethical behaviour is meant both behaviour that violates legal regulations and behaviour that conflicts with the following Code of Ethics and related internal regulations and procedures.

## **Art. 11 - Respect and protection of the environment**

Protecting the environment is one of Hotel Interski's priority responsibility objectives. We sensitise our stakeholders to respect the environment in which we operate, preserving the integrity of environmental matrices and encouraging the implementation of virtuous behaviour.

Hotel Interski can make a significant positive impact in terms of environmental sustainability in the short and long term, both directly and through establishing itself as a role model for the sector in which it operates. This impact can be attributed both to the consumption of resources and the generation of emissions and waste directly linked to its activities, and to activities and behaviour that it does not control directly, as they are carried out by third parties with whom it has relations, such as customers and suppliers.



To maximise the positive impacts, Hotel Interski is committed to:

- ensure full and substantial compliance with environmental legislative requirements;
- continually seek innovative and effective solutions in the environmental field, including by offering specific products and services to customers and solutions for our suppliers
- disseminate good practices of environmental responsibility among customers and actors in the tourist destination;
- pursue a conscious consumption of the resources needed to carry out activities, through the progressive improvement of efficiency;
- consciously monitor the consumption data of the resources used and make staff aware of this;
- make environmental data and commitments accessible to the public through the various communication channels available.

With regard to the supply chain of goods and services, Hotel Interski welcomes suppliers who conduct their business in an environmentally and socially sustainable manner by adopting the measures and tools necessary to minimise the negative impacts generated.

Hotel Interski raises the awareness of suppliers towards an environmentally responsible attitude and agrees, where necessary, on solutions to minimise their impacts.

Dialogue is maintained with local associations to develop activities under the banner of sustainability.



## 2. Relationship with staff

### **Art. 12 - Value of human resources**

Hotel Interski recognises the value of human resources, respect for the individuality of workers and the importance of their contribution to the company's activities and development.

Hotel Interski ensures compliance with employment contracts, social security, insurance and welfare regulations of the sector. The management of the employment relationship is oriented towards fostering the professional growth and skills of each employee.

Any form of discrimination based on race, sex, nationality, religion, language, in terms of hiring, remuneration, dismissal, as well as any form of favouritism, is categorically opposed. Access to roles and positions is directly linked to the skills and abilities of individuals, taking into account the specific needs of the Company, without resorting to discriminatory practices against employees and collaborators.

### **Art. 13 - Health and Safety**

Hotel Interski complies with current legislation on the protection of health and safety in the workplace, and is committed to protecting the moral and physical integrity of employees, collaborators and other stakeholders. To this end, it promotes responsible and safe behaviour and adopts all the safety measures required by technological evolution to guarantee a safe and healthy working environment, in full compliance with current prevention and protection regulations. In compliance with the provisions of Legislative Decree 81/2008 T.U. on safety at work, the Management has organised a risk prevention and protection service. The risk assessment document is regularly drawn up and reviewed. All the professional figures envisaged by the T.U. are also present in the organisation in charge of company safety.

Group employees are invited to report any anomalies and/or irregularities concerning the application of Legislative Decree 81/2008 T.U. on safety at work to the RLS or to the prevention and protection officer.

Employees are also required to prevent and combat elements detrimental to an optimal environmental situation in the workplace, such as

- working under the influence of alcohol or drugs;
- respecting the ban on smoking inside the offices.



#### **Art. 14 - Protection of the individual**

Hotel interski undertakes to ensure compliance with the conditions necessary for the existence of a collaborative, non-hostile working environment and to prevent discriminatory behaviour of any kind.

The cooperation of all is required in order to maintain a climate of respect for the dignity, honour and reputation of each individual. No intimidating or discriminating attitude shall be tolerated, and appropriate disciplinary measures shall be taken against those who assume such attitudes or abuse their position of authority within the company.

The Company, referring to the current legislation on the protection of the dignity of women and men at work, requires the addressees of this Code to encourage the prevention and fight against sexual and moral harassment, including in this the obligation to support the person who wants to react to a sexual or moral harassment, and providing them with indications and clarifications on the procedures to follow.

The Company is also committed to preventing any mobbing activity, understood as the set of violent behaviours (psychological abuse, harassment, demotion, marginalisation, humiliation, backbiting, etc.) perpetrated by superiors and/or colleagues against a worker, prolonged over time and damaging to the worker's personal and professional dignity as well as his/her psychophysical health.

Employees who believe they have been discriminated against must report the incident to their manager, who will proceed to ascertain the actual violation of the Code of Ethics.

Discrimination does not constitute discrimination if it can be justified on the basis of objective assessment criteria.

The selection of personnel is subject to the verification of the candidates' full compliance with the professional profiles required by the company, in compliance with equal opportunities for all persons concerned.

Staff are hired on the basis of regular employment contracts, since no form of employment relationship that does not comply with or in any case circumvents the provisions in force is allowed.



### **Art. 15 - Protection of privacy**

The Company protects the privacy of employees and stakeholders in accordance with the relevant regulations, undertaking not to communicate or disseminate, without prejudice to legal obligations, the relevant personal data without the prior consent of the person concerned.

The acquisition, processing and storage of this information takes place within specific procedures aimed at preventing unauthorised persons from gaining knowledge of it and at ensuring that all privacy protection regulations are fully respected, as indicated by the GDPR General Data Protection Regulation.

It is forbidden for employees to divulge any kind of information that they may become aware of in the course of their work, unless authorised by the relevant manager.

The employee must observe this duty of confidentiality even after termination of employment by ensuring that the requirements of current privacy regulations are met.

### **Art. 16 - Staff selection and recruitment**

Without prejudice to the obligations deriving from the provisions in force, the selection of personnel is subject to the verification of the candidates' full compliance with the professional profiles required by the Group, in compliance with equal opportunities for all those concerned.

In no case do staff recruitment advertisements specify or require requirements such as race, gender or other discriminatory personal characteristics.

At the time of hiring, each employee receives information on remuneration, on the rules and procedures to be adopted to prevent and avoid health risks associated with work, on the internal regulations for the management of personal data and use of IT systems.

The treatment of workers is consistent with seniority, the type of tasks performed and professional skills. For the same tasks and function, workers are offered the same training opportunities.

### **Art. 17 - Employee Duties**

Employees undertake to comply with the obligations set out in this Code of Ethics and, in the performance of their duties, to abide by the law and to base their conduct on the principles of integrity, fairness, loyalty and good faith.

They are required to dress decently, use language that is appropriate to the working environment and, more generally, behave in a manner based on mutual respect and willingness to engage in dialogue and confrontation.



### 3. Relationship with customers

The full satisfaction of its Guests represents for Hotel Interski the main objective to be pursued through the design and provision of a service centred on respect for the fundamental values of fairness, honesty, efficiency and professionalism. The deep synergy with local associations aims to complete a tourist offer that enhances and conveys to Guests the peculiarities of our unique territory.

#### **Art. 18 - Contracts and communication**

Hotel Interski undertakes to communicate in a transparent and correct manner

- the nature, price and quality of the service offered, by scrupulously observing internal procedures relating to the management of customer relations
- the clauses contained in contracts concluded with third parties.

Hotel Interski ensures that the advertising campaigns and information material distributed is truthful and fully reflects what is actually offered at the establishment.

#### **Art. 19 - Interaction with customers**

The company protects the privacy of its customers, in accordance with the relevant regulations, undertaking not to communicate or disseminate their personal or sensitive data.

Hotel Interski undertakes to satisfy its Guests by establishing a relationship characterised by high professionalism, availability, respect, courtesy and maximum cooperation. Any form of discrimination against Guests is condemned.

The company is committed to fostering interaction with customers through the management and rapid resolution of any complaints and/or disputes, using appropriate communication systems. The quality of the service offered is also monitored through the possibility for Guests to express their opinions using appropriate communication channels.



## 4. Relationship with the environment

Hotel Interski is committed to scrupulously complying with the laws and regulations in force within the overall framework of continuous improvement in the environmental management of its facilities and its commitment to the protection of the environmental matrices with which it interacts as part of its operational processes.

A great deal of attention is also paid to raising guests' awareness by communicating environmental sustainability through its website and dedicated app.

### **Art. 20 - Design and realisation of structures**

When designing and building its facilities, Hotel Interski strives to respect the local architectural tradition with a view to regionality. Structures and installations are built to ensure high levels of comfort for users and energy efficiency at the same time.

### **Art. 21 - Reducing energy and water consumption**

Hotel Interski constantly and consciously monitors its energy and water consumption, making reasonable efforts to use natural resources rationally, involving its staff and raising awareness among its guests through appropriate communication channels.

### **Art. 22 - Self-sufficiency**

Hotel Interski makes reasonable efforts to reduce the need for food products from external suppliers. The hotel's own green area is partially used as a vegetable garden for the cultivation of 0-km products to be served to guests. The management of this area is inspired by ecological principles through the use of recovered rainwater and reducing the use of chemicals.



### **Art. 23 - Developing sustainable mobility**

The company is sensitive to its fragile natural surroundings and considers it of paramount importance to contribute to the development of sustainable mobility infrastructure. The electrification of mobility is a priority for Hotel Interski, which strives to provide suitable services to its guests in this respect.

### **Art. 24 - Waste management**

Recipients are made aware of the implementation of waste management methods aimed at favouring its reduction and valorisation through the development of reuse, separate collection and recycling systems, as well as the correct management of substances that may be considered harmful to man and the environment, reducing them or replacing them, where feasible, with others with a lower impact.

### **Art. 25 - Supporting the local community**

Hotel Interski is committed to promoting the eco-sustainable development of its business, while promoting the area and supporting cultural initiatives promoted by the local community and institutions, through

- sponsoring cultural and sporting events typical of the Tourist Destination
- employment of personnel resident in the municipalities of the Tourist Destination.



## 5. Relationship with suppliers

### **Art. 26 - Choice of supplier**

The manner in which suppliers are chosen and the purchase of goods and services of any kind must be carried out in compliance with the principles of competition and equality of conditions for those submitting bids, and on the basis of objective evaluations concerning

- price of the supply,
- any environmental certifications obtained by the supplier,
- location of the supplier's headquarters,
- presence of sustainability labels or certifications for the products requested

### **Art. 27 - Regionality and Awareness**

Hotel Interski considers Regionality as the enjoyment of goods and services produced or provided by companies located in the territory of the Tourist Destination. Such supplies convey the artistic, cultural, environmental, culinary and social values and peculiarities of the territory. Regionality is considered a factor of considerable importance in the choice of suppliers in order to guarantee a tourist offer that enhances the peculiarities of Val Gardena.

Like Regionality, Awareness is also an important principle to be observed. It is defined as the priority propensity, on the part of Hotel Interski, to purchase products certified according to environmental or fair trade standards.

### **Art. 28 - Transparency**

Relations with the Company's suppliers, including suppliers of financial and consulting services, are governed by the rules of this Code and are subject to constant and careful monitoring by the Company, also from the point of view of the congruity of the services or goods supplied with respect to the agreed consideration.

Hotel Interski prepares appropriate procedures to guarantee the utmost transparency in supplier selection operations and the purchase of goods and services.

Consistency with its social and ethical identity means that Hotel Interski requires all suppliers of goods and services to read this Code, and to ensure compliance with the principles and conduct set out herein.



### **Art. 29 - Honesty**

Hotel Interski establishes relations with its suppliers in compliance with the regulations in force and the principles of this Code. The Company expects its suppliers to behave correctly, diligently and in accordance with the provisions of the law, paying particular attention to compliance with procedures and good practices in the field of ethics, health and safety protection in the workplace and respect for the environment.

The Company, with the aim of promoting respect for ethical principles and the protection of health and safety in the workplace and the environment throughout the supply chain, encourages its suppliers to apply the same selection criteria as its subcontractors.

### **Art. 30 - Fairness and diligence in the performance of contracts**

The Company and the supplier must work to build a collaborative relationship and one of mutual trust. The Company undertakes to inform the supplier in a correct and timely manner regarding the characteristics of the activity, the forms and times of payment in compliance with the regulations in force.

The supplier's performance of the contractual services shall comply with the principles of fairness, correctness, diligence and good faith and shall take place in compliance with the contractual commitments.

### **Art. 31 - Confidentiality of information**

Hotel Interski undertakes to maintain total confidentiality on information concerning its suppliers, including contractors and subcontractors, and to use such information only in the cases provided for by law or following the consent of those concerned.

Suppliers are also required to ensure confidentiality with regard to information, documents and personal data relating to the company and its employees.



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