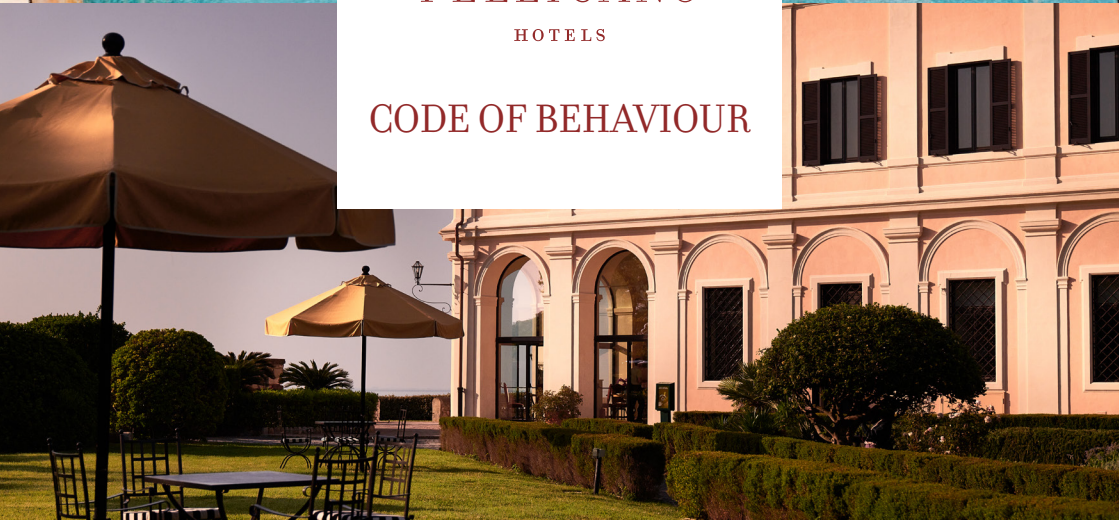




PELLICANO

HOTELS

CODE OF BEHAVIOUR





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1.INTRODUCTION

For over sixty years, the Pellicano Hotels Group has been a prominent player in the luxury hotel sector. In every detail, it embodies the passion for Italian tradition and highlights the wonder of the ecosystem in which its hotels are located. Since 2020, with the “Il Dolce Far Bene” project, the Group has embarked on a journey to rejuvenate and modernise the concept of “La Dolce Vita,” which has always accompanied it, for the modern traveller, its collaborators, and stakeholders. As stated by Marie-Louise Scio, CEO & Creative Director of the Pellicano Hotels Group:

“Our philosophy has always been to offer diverse experiences to our guests. In this journey towards sustainability, through the ‘Il Dolce Far Bene’ project, we wanted to ensure that we are responsible for every aspect of the business, not only, for example, in favouring local producers or reducing plastic usage but also in prioritising the growth of our employees and ensuring that the impact on local communities is as positive as possible.

The company’s philosophy is inspired by honest luxury and a more conscious, environmentally and people-friendly approach to travel. A strategic element is constant engagement with both internal and external stakeholders to meet their expectations and gain their trust. The success of the Group depends not only on the quality of products and services but also on how they have been executed.”

1.1. What is the Code of Behaviour

The Code of Ethics aims to collect and identify the guiding principles that should steer the behaviours of the “Recipients of the Code” (subpar. n. 2) in continuity and coherence with the Group’s mission.

The Code of Ethics, a governance tool, explicitly articulates the values that Pellicano Hotels Group believes in and wants to commit to; it places the relationship with stakeholders at the centre and inevitably raises the level of consistency that everyone within the Group must maintain to earn the trust of all stakeholders.

Pellicano Hotels Group draws inspiration from the principles of the Global Compact¹, which promotes a sustainable global economy: one that respects human rights and labour, environmental conservation, and the fight against corruption. Furthermore, in line with the action framework outlined by the European Union, it is invested in the development and implementation of all measures aimed at promoting corporate social responsibility.

In this regard, it has chosen to commit to adopting responsible behaviours on a social level, including with this Code.

The Group is aware that ethical behaviour represents a value for the company and a prerequisite for success, and that principles such as honesty, moral integrity, transparency, reliability, and responsibility are the foundation of all activities in line with its mission.

The ethical principles contained in this document are of great importance, contributing to strengthening the company’s credibility in the civil and economic context in which it operates and making the values that characterise its way of operating competitive.

¹ Launched operationally on July 26, 2000, at the United Nations Headquarters in New York, the Global Compact is a non-binding United Nations initiative that encourages businesses worldwide to establish an economic, social, and environmental framework aimed at promoting a healthy and sustainable global economy. Companies that join the Global Compact must share, support, and implement a set of fundamental principles related to human rights, labor standards, environmental protection, and anti-corruption within their sphere of influence. These principles are universally shared and are derived from the Universal Declaration of Human Rights, the ILO Declaration, the Rio Declaration, and the United Nations Convention against Corruption.

1.2. Consequences of Violation

For the personnel of the Group, compliance with the values contained in the Code of Ethics is complementary to compliance with legal obligations under Article 2104 of the Civil Code².

Therefore, conduct that contradicts and/or violates the principles established in this Code may be subject to sanctions under the employer's disciplinary authority³. Similarly, the violation of these principles by third parties constitutes a breach of contractual obligations with all legal consequences.

² "The employer must exercise the diligence required by the nature of the service owed, the interest of the company, and the higher interest of national production. Furthermore, they must observe the provisions for the execution and discipline of work issued by the entrepreneur and by those collaborators of the entrepreneur to whom they are hierarchically subordinate."

³ In accordance with the procedure under Article 7 of the Labor Statute.



2. RECIPIENTS OF THE CODE

2.1 Governance

The Administrators of the companies within the Group, in the execution of their functions and in relation to their respective responsibilities, must apply the Code and contribute to its dissemination, drawing inspiration from and conforming to the values expressed within it in all their activities.

2.2. Management

The Group's Managers must adhere to the values contained in the Code when setting business objectives, proposing and executing projects and investments, and in all decisions or actions related to management, financial and technological aspects of the company, service quality, and guest well-being.

2.3. Human Resources

All individuals within the Group are required to consistently respect the Code and actively participate in its implementation, suggesting improvements and reporting any violations.

In particular, it is required that all personnel be fully aware of the principles and rules contained in the Code and, as such, align all actions and behaviours with the values and content expressed within it.

Compliance with the guidelines outlined in the Code, harmonised and consistent with the Personnel Disciplinary Code to which it explicitly refers, is an essential part of professional activities and the way in which we carry out our work.

2.4. Third Parties

These are individuals or entities that interact with Pellicano Hotels and have relationships with it.

All corporate stakeholders must be recognised as interlocutors of the Group, both because they contribute, albeit in different and specific ways, to the

company's mission and because they significantly experience the positive or negative effects of the company's activities in terms of their well-being. Among these stakeholders are the facility's guests, business partners, suppliers, competing enterprises, and the entire community.



3.ETHICAL PRINCIPLES

3.1. Service Quality and Guest Feedback

Pellicano Hotels has always placed utmost care on both the quality of the service offered and the real guest experience, constantly focusing on meeting their expectations. To achieve this, the Group encourages the systematic use of tools for customer satisfaction research and analysis to better organise its offerings and direct customers towards innovative intermodal and multiservice solutions. For these reasons, the behaviour of all Code recipients, especially the Group's personnel, must always be characterized by the highest integrity, availability, courtesy, efficiency, and completeness in providing information and supporting received requests. It is essential to convey a message of high seriousness, professionalism, and serenity in every situation. Every behaviour must be attentive and respectful of all diversity, and any behaviour even partially interpreted as discriminatory is prohibited. Complaints are handled with sensitivity and offer opportunities for improvement, conflict resolution, and the restoration of customer trust and satisfaction.

3.2. Transparency and Fairness

The Group implements corporate governance inspired by the highest standards of transparency and fairness in corporate administration.

The Group adopts appropriate measures to prevent nepotism, favouritism, or forms of clientelism.

The objective towards customers is always to serve their needs with correct and transparent behaviours. All recipients are required to respect consumers' rights and, in particular, provide clear, accurate, and comprehensive information about the terms and services offered by Pellicano Hotels Group through communication channels and to remain honest in promotional activities so that customers can make informed decisions.

Relationships with Suppliers (including external partners, consultants, brokers, subcontractors, and, more generally, all parties involved in the supply chain) and business partners must be oriented towards adhering to the

principles of honesty and integrity, without favouritism, and only with reliable, reputable⁴ individuals and companies.

Operations, agreements, and commercial transactions with Suppliers are established through specific company processes - the so-called purchasing policy, referred to herein - aimed at the correct identification of product, price, quality, and reliability. This is done to ensure the integrity of the supply chain regarding key principles, including human rights and labour, the fight against corruption, and the environment, which we strive to uphold in all our activities and are contained in the Code of Ethics.

The Group recognizes healthy and fair competition among competitors.

Fair and honest competition⁵ is a necessary condition for business development and market persistence, formally and substantively following the relevant regulations. Relationships with public institutions and entities are also guided by principles of impartiality and fairness in line with the Group's guiding values.

3.3. Protection of Individuals

The Group opposes all forms of labour exploitation, especially child labour⁶, and rejects irregular work.

Social bodies and Management commit to:

- Ensure equal regulation;
- Establish compensation based on merit and competence;
- Provide Group employees with annual feedback for performance assessments, career plans, goals, and training activities.

⁴ The general clauses of good faith and fairness are contained in Article 1175 of the Civil Code, which states: "The debtor and the creditor must act in accordance with the rules of fairness," and in Article 1375 of the Civil Code, which states: "The contract must be performed in good faith."

⁵ According to Article 2598 of the Civil Code: "Anyone engages in unfair competition who: 1) uses names or distinctive signs capable of causing confusion with names or distinctive signs legitimately used by others, or servilely imitates a competitor's products, or engages in any other acts capable of creating confusion with the products and the activity of a competitor; 2) disseminates information and assessments about the products and the activity of a competitor that are capable of discrediting them, or appropriates the merits of a competitor's products or business; 3) directly or indirectly uses any other means that do not conform to the principles of professional fairness and are capable of damaging another's business."

3.4. Gender Equality

Pellicano Hotels Group is committed to ensuring gender equality within its corporate reality⁷.

Social bodies, Management, and HR managers commit to:

- Promoting career opportunities that consider the needs of working mothers;
- Supporting female leadership;
- Ensuring equal pay for equal work between men and women;
- Implementing meritocratic personnel selection without prejudice;
- Actively participating in gender-neutral projects;
- Taking concrete measures to ensure women's work-life balance;
- Promoting and fostering a culture of gender equality at all levels of the company;

The Group opposes behaviours that often lead to sexism, discrimination, and harassment due to stereotypes and cultural legacies;

Harassment can take various forms, sometimes obvious, other times more subtle. Here are some examples of inappropriate and harassing behaviours:

- Unwanted advances;
- Dissemination of offensive material or other personal information (such as photos and videos) (also through social networks);
- Insults, threats through aggressive actions or words, derogatory remarks, or inappropriate gestures;

⁶ In accordance with Article 32 - Prohibition of child labour and protection of young people in the workplace of the Charter of Fundamental Rights of the European Union, it is stated that "child labour shall be prohibited. The minimum age for admission to employment shall not be lower than the age at which compulsory schooling ends, without prejudice to such rules as may be more favourable to young people and except for limited derogations." This is in line with Directive 94/33/EC concerning the protection of young people at work, as well as Article 7 of the European Social Charter and points 20 to 23 of the Community Charter of Fundamental Social Rights of Workers.

⁷ In accordance with Legislative Decree No. 198/2006 (Equal Opportunities Code) and Law No. 162/2021 enacted in implementation of the National Recovery and Resilience Plan (Mission 5 NRRP).



- Physically or verbally offensive behaviour (including references to nationality, ethnicity, origin, religion, age, gender, sexual orientation, marital status, or disability);
- Abuse of power or authority;
- Any form of workplace violence.

3.5. Diversity Promotion and Protection Against Discrimination

Inclusion, the protection of diversity, and non-discrimination are priorities for Pellicano Hotels Group. Diversity can refer to visible (e.g., gender, age, etc.) and invisible (e.g., education, marital status, etc.) factors. All Code recipients are required to conduct their daily behaviours with full respect for everyone, based on the principle of non-discrimination.

Pellicano Hotels guarantees equal opportunities in selection and recruitment, access to training, career development, and advancement, assessing individuals' specific skills without bias.

The Group believes that a team formed with respect for all diversities creates a more dynamic work environment, full of stimuli, and leads to better results. Cultural and ethnic diversity is considered a valuable asset.

The Group opposes and combats discriminatory actions or behaviours by all stakeholders.

3.6. Health and Safety

Pellicano Hotels Group promotes a policy focused on the psychophysical well-being of its personnel, aiming to integrate work and personal and family needs. This includes strict compliance with health and safety regulations⁸ and continuous updates to protection measures through effective benchmarking.

The health and safety of individuals have always been distinctive elements of the Group's historical and professional heritage and values, intrinsically linked

⁸ Legislative Decree No. 81/2008, also known as the Consolidated Law on Workplace Health and Safety.

to the challenge of innovation. The Group's Management is committed to guiding decisions and management processes in line with this value, involving all individuals in prevention activities.

The Group explicitly prohibits performing work activities under the influence of alcoholic or psychotropic substances and their consumption during work and in workplaces.

Additionally, the Group commits to monitor the implementation of laws related to smoking bans⁹.

3.7. Corporate Welfare

Pellicano Hotels' primary aim is to meet the needs of its employees, also through the adoption of welfare tools and benefits aimed at enabling a better balance between private and work life. For this purpose, the Group constantly monitors work-life balance tools provided by legislation, which can potentially be integrated into the corporate context in addition to those already in use (such as smart working, meal vouchers, uniforms, canteen, laundry, accommodations for seasonal workers, etc.).

3.8. Environmental Preservation and Protection

All recipients of this Code commit to strengthening Pellicano Hotels Group' role within the community, starting from the awareness that long-term economic development must simultaneously increase social well-being and natural heritage. The Group intends to respect and support local communities through social and environmental initiatives, believing that their development, not only economically, contributes added value to the Group.

Therefore, it is essential to plan activities responsibly and with attention to the rights of future generations, evaluating the impact on both the social fabric and the environment.

⁹ Legge n. 3/2003 art. 51 ai sensi del quale "è vietato fumare nei locali chiusi, ad eccezione di: a) quelli privati non aperti ad utenti o al pubblico; b) quelli riservati ai fumatori e come tali contrassegnati".

In particular, for Management, the primary objective is to measure the Group's performance not only in economic terms but also in terms of eco-sustainability. The Group intends to minimize the negative effects of its activities on the environment and the local community in compliance with current legislation¹⁰. In this regard, the behaviour of Group employees must be oriented towards respecting and safeguarding local culture and communities.

To this end, suppliers and business partners are asked to commit to strengthening their ecological commitment through clear conduct rules (assessment of environmental risk in financing and investments, exclusion of polluting activities or products, proper waste management and disposal, use of recyclable and eco-friendly products, etc.).

The Group promotes this commitment with guests of its facilities and aims to raise awareness among them to make daily choices that align with these principles (reducing plastic, paper, water, and energy consumption, etc.).

Pellicano Hotels is also involved in various activities to support and safeguard the marine environment and beaches.

3.9. Protection of Corporate Assets

All recipients of this Code are required to protect and safeguard the values and assets of the Group, including intangible assets, in accordance with applicable procedures.

3.10. Conflict of Interest Management

The Group implements and maintains an effective conflict of interest management policy to prevent conflicts of interest in relationships with

¹⁰ Law 152/06, enacted through Legislative Decree No. 152 of April 3, 2006, constitutes the consolidated text of the environmental regulations and waste management in Italy. The Italian environmental consolidated text gathers the main regulations governing environmental and territorial matters in our country in accordance with Council Directive 91/156/EEC of March 18, 1991, amending Directive 75/442/EEC on waste, Directive 2000/60/EC of the European Parliament and of the Council of October 23, 2000, establishing a framework for Community action in the field of water policy, and Directive 2004/35/EC of the European Parliament and of the Council of April 21, 2004, on environmental liability with regard to the prevention and remedying of environmental damage.



customers, ensuring transparency and integrity of information about their nature, origin, and scope.

Conflict of interest can arise when personal or family interests or other types of relationships conflict with the interests of the Group.

The Group is committed to avoiding conflicts of interest, being aware of the risks, and taking necessary precautions.

In general, all individuals are required to avoid situations in which personal interests, external activities, financial interests, or familiarity conflict with the Group's interests. In particular, social bodies and Management must adopt appropriate organizational models to prevent and counteract the emergence of such conflicts¹¹.

3.11. Anti-Corruption Policies

Pellicano Hotels Group rejects all forms of corruption and is committed to preventing it in any way. The Group promotes and adopts initiatives to counter all forms of corruption, including extortion and bribery, and must refrain from dealing with suppliers known or reasonably suspected not to adhere to this principle.

For this purpose, the Group must conduct Due Diligence in the prior assessment of potential suppliers.

Providing loans and/or gifts on behalf of the companies or the Group to political parties, committees, organizations or political and trade union movements, or their representatives and candidates, directly or indirectly and in any form, including associated organizations, is expressly prohibited.

All individuals in the Group are required to ensure transparency and traceability of relationships with institutions, organizations, public or private entities. In particular, contributions and sponsorships for charitable entities must not be used as a means of corruption.

¹¹ In accordance with Article 2475-ter of the Civil Code, "Contracts entered into by directors who have the representation of the company in a conflict of interest, on their behalf or on behalf of third parties, with the same company, may be annulled at the request of the company, if the conflict was known or recognizable by the third party."

Gifts and forms of hospitality are allowed only if they comply with company provisions, attributable to normal professional/commercial courtesy relationships, and are not such as to compromise or influence integrity, independence, reputation, impartiality, or intended to obtain undue advantages.

3.12. Privacy and Information Confidentiality

Pellicano Hotels commits to protecting information and data related to all stakeholders and complying with privacy regulations¹².

To this end, it acquires only the data necessary for business purposes and retains them only for the time required to achieve those purposes.

In particular, the Group undertakes to implement specific data protection policies and procedures and to prevent unauthorized use of data. Personal data of guests are treated with extreme confidentiality and discretion.

Marketing measures and promotional information are directed only to those customers who have given their consent.

Social bodies, Management, and staff guarantee the confidentiality of information and documents that they become aware of in their roles within the Group.

Therefore, the use, transfer, or publication of such data is strictly prohibited. It is expressly forbidden to disclose confidential information in public places where third parties may hear it, as well as to handle confidential documents in public places where third parties may see them.

The dissemination of information and data about the Group to the public through the press and other information channels is determined and organized by the officially delegated Group Management.

Relationships with the media must be transparent and in line with internal policies to ensure the protection of the group's image and brand.

The Group recognizes the role of social media as communication technologies designed to share, promote, and socialize ideas and content.

¹² Regulation (EU) 2016/679, implemented through Legislative Decree of August 10, 2018, No. 101.

All recipients of this Code commit to using these tools in accordance with the principles of fairness and correctness and to preserve the Group's image in the eyes of the public. Everyone is required to refrain from sharing confidential information online or making comments and opinions that could negatively impact the company's reputation, security, and potential economic losses or damage to the group's image.

INDEX OF LEGAL REFERENCES

Civil Code:

Article 2104;

Article 1175;

Article 1375;

Article 2579;

Article 2475-ter.

Special Laws:

Article 7 of Law No. 300/70;

Legislative Decree No. 198/2006;

Law No. 162/2021;

Legislative Decree No. 81/2008;

Law No. 3/2003;

Law No. 152/2006.

European Union:

Article 32 of the European Convention on Human Rights (CEDU);

Regulation (EU) 2016/679.

United Nations

United Nations Global Compact.



IL PELLICANO S.p.A.
Località Sbarcatello - 58019 Porto Ercole (GR)
Tel: (+39) 0564 858 111 - Fax: (+39) 0564 833 418