

NH Hotel Group, S.A. Sustainable Procurement Commitment

1. Introduction

The products, services and activities of NH Hotel Group's suppliers can have an impact on the Company's reputation, affecting the level of trust of other stakeholders. Suppliers must comply with the NH Hotel Group Procurement Policy and with the rules set out in this document, applicable laws and regulations, and ask their supply chain, including third-party labor agencies, to do the same.

The Procurement Policy establishes the global framework for the control and management of the risks (market, credit, business, regulatory, operational and reputational, cybersecurity and criminal) resulting from purchases of equipment and material, and the contracting of works and services throughout NH Hotel Group, with special emphasis on compliance with ethical commitments by the Group's professionals and its suppliers.

NH Hotel Group is not a co-owner or co-employer of any of its Suppliers, each of which is the sole employer of its employees and therefore fully responsible for any of its decisions relating to employment, and for complying with all applicable laws, standards and regulations in running its business. Failure to comply with the NH Hotel Group Code of Conduct for Suppliers may give rise to the termination of the contract as a Supplier of the Group.

NH Hotel Group's sustainable procurement commitment has been developed in the frameworks of the Company's Procurement Policy and is an appendix to the Policy.

2. Commitments

Aware of the new challenges it has to face, and keeping its commitment to responsible business management and towards sustainable development, the supply functions and relations with the supply chain is also an area in which the values, principles and guidelines for behavior in carrying on the professional activity should materialize.

NH Hotel Group seeks to guarantee a fair, transparent and ethical value chain and to involve its suppliers right from their first contact with the Group, always with a proactive attitude towards their needs and supporting them in the development of new capabilities.

Through the Coperama Code of Conduct applicable to suppliers, the NH Hotel Group Procurement Policy and this Sustainable Procurement Commitment, NH Hotel Group promotes respect for Human Rights, compliance with the applicable labor legislation, the prohibition of child labor and forced labor, the elimination of discriminatory practice, compliance with occupational risk prevention and the fight against fraud, bribery and corruption, and protection of the environment wherever it operates. All NH Hotel Group suppliers must work with honesty and integrity as valued standards.

Suppliers are also expected to comply with the terms and conditions of their agreements with NH Hotel Group, as well as all the applicable laws and regulations in the countries and jurisdictions in which they carry on their activity or supply goods and/or services.

These commitments are the basis of the Code of Conduct for Suppliers, which establishes the minimum standards that NH Hotel Group suppliers are expected to uphold.

3. Sustainable Supply Chain Principles

1. Human Rights

NH Hotel Group recognizes and respects the principles contained in the United Nations Declaration of Human Rights. NH Hotel Group is committed to combating modern slavery, by educating its employees and encouraging its partners, as part of the business community in general, to adopt a stance against people trafficking. Furthermore, NH Hotel Group's suppliers shall not breach these principles.

2. No to child labor

Suppliers must comply with the applicable provisions on minimum age under local laws and regulations, and must not employ any worker younger than the legal employment age for the type of work carried out in any facility.

3. Fight against people trafficking and slavery

Suppliers must not allow any form of modern slavery, human trafficking, child exploitation or forced labor. All work must be voluntary and workers must never be forced to surrender the identification, passports or work permits issued by the government. Suppliers must guarantee that the principle is applied whereby the employer pays and workers are not required to pay any hiring fees or expenses as a condition to obtain work.

4. No to harassment or cruel or inhumane treatment

NH Hotel Group's suppliers must treat all workers -including temporary workers, immigrants, students, contracted workers, direct employees and any other type of worker- with dignity and respect. They must guarantee that there are no threats of violence, physical punishment, confinement or other forms of physical harassment or abuse, sexual harassment or physical, sexual, psychological or verbal abuse. Suppliers will clearly define disciplinary policies and procedures in support of these requisites and communicate them to workers.

5. No discrimination

There will be no positive or negative discrimination at the workplace or in the supplier's hiring policy for reasons of race, sex, age, disability, marital status, sexual orientation, pregnancy, nationality, caste, national origin, status as a veteran, minority group, affiliation to a political, religious or trade union organizations or any other characteristic protected by law.

6. Labor conditions

Suppliers must guarantee and document that works have reasonable daily and weekly working hours, regulated by local law. Suppliers must comply with local legislation and sector standards with regard to remuneration, working hours (including overtime), rest days and holidays.

Suppliers will compensate workers in accordance with all applicable wage laws, including those concerning the minimum wage, overtime, rest days and holidays.

7. Health and safety at work

Suppliers must provide a safe and healthy workplace, providing an adequate level of protection of worker's health against the hazards and risks deriving from the conditions of their jobs.

8. Freedom of association

Suppliers must allow workers the right of freedom on free association and organization and collective bargaining in accordance with applicable legislation.

9. Support to the community

Suppliers are expected so create shared value in the community. Suppliers must assess the potential impact of their activities on the local community and take measures to mitigate and/or prevent any negative impact.

10. Fair competition

Suppliers must comply with legal requisites regarding fair competition and honest marketing. They will act confidentially, legally and with integrity in handling competitive and private information.

11. Business ethics and the fight against corruption

Suppliers will conduct all their commercial relations with integrity and transparency, and these relations will be reflected accurately in Supplier's annual reports and records. NH Hotel Group prohibits offering or handing over money or any other item of value, directly or indirectly, to any person for the purpose of influencing the exercise of their official functions in a way that benefits NH Hotel Group. Suppliers will not make illegal payments either themselves or through third parties (or agents).

12. Environmental sustainability

Suppliers will be encouraged to have a program to minimize any negative environmental impact of the life cycle of their product/service and, consequently, to minimize the carbon footprint of their product/service. Suppliers are expected to comply with ruling legislation on protection of the environment and to be proactive from the environmental standpoint.

13. Carbon and emissions management

Suppliers should control the carbon footprint of their products and services and strive to reduce it. Suppliers should monitor and control emissions of volatile organic chemicals, aerosols, corrosives, particles, chemicals that deplete the ozone layer and combustion byproducts generated by their operations into the atmosphere.

14. Water management

Suppliers must control the water footprint of their products and services and strive to reduce it. Suppliers must monitor and control dumping of pollutants generated by their operations into water courses.

15. Waste reduction

All types of waste should be reduced or eliminated at source through modifications in production, operating processes, replacement of materials, conservation, recycling and reuse of material. Before disposing of waste, Suppliers should supervise, control and treat as necessary any solid waste generated by the operations, industrial processes and sanitation facilities.

16. Hazardous materials and restricted substances

Suppliers must comply with all applicable laws, regulations and the requisites of NH Hotel Group in relation to the prohibition or restriction of specific substances, including labelling for the recycling and disposal of such substances. They must also identify and manage hazardous material to ensure it is handled, stored, recycled, reused or disposed of safely, in a manner that does not harm the environment. Suppliers must avoid the use of any material included in the list of hazardous substances of the European taxonomy or in any pertinent local legislation (i.e., prohibition of asbestos, arsenic, cadmium, chromium compounds, CFC, cyanides, halons, PCB, lead, azo dyes, DMF, HAP, phthalates, PFOS or nickel release). They must strive to use chemicals included in the EPA's list of safest chemical ingredients, as well as alternative chemical products with low toxicity and high biodegradability. Suppliers must not use materials obtained from endangered types of wood, animals or plants.

17. Deforestation

Priority will be given to the acquisition of products that are certified by recognized organizations such as the Forest Stewardship Council (FSC), with the commitment to not acquire products that come from areas that have suffered deforestation or from suppliers involved in deforestation activities.

18. Privacy

NH Hotel Group respects the rights to privacy and intimacy of all the people it interacts with, and makes appropriate use of the personal data and information to which it has access in the countries where it operates, paying particular attention to the data of its customers and suppliers, complying at all times with ruling legislation. NH Hotel Group has made a whistleblowing channel available to third parties so that they can report, among others, alleged damage to the honor and reputation of any person with whom NH Hotel Group interacts.

4. Privacy and Data Confidentiality

For suppliers who provide a service that involves processing personal data or in which the provision of the service envisages potential access to such data, the contract includes the

commitment to comply with the terms of all applicable personal data protection laws and regulations.

5. Monitoring and Information Channel

Suppliers undertake to notify workers and any subcontractor that they may report serious or delicate concerns or a possible breach of the NH Code of Conduct applicable to the Group's suppliers as follows:

<https://www.nh-hotels.com/es/corporate/sostenibilidad/codigo-de-conducta-y-ddhh>.

Any sign of actions or omissions that might entail a breach of the rules included in this Policy should be reported immediately through the NH Hotel Group whistleblowing channel, which is accessible to all employees and to third parties, through codeofconduct@nh-hotels.com.

If NH Hotel Group receives such a complaint, it will ask the Supplier to comment and, if necessary, NH may request an improvement plan to correct the problem. If the Supplier does not act or does not respond to the complaint – and is not willing to work to correct the problem – the Supplier may be subject to disciplinary actions, including termination as a Supplier of NH Hotel Group and/or review by the local authorities.

NH Hotel Group will maintain confidentiality to the extent possible and will not tolerate any kind of retribution or reprisals against any person who, in good faith, has requested advise or has reported questionable behavior or a possible breach of the Coperama Code of Conduct for Suppliers or the NH Hotel Group Procurement Policy.

Anyone who has questions about the NH Hotel Group Code of Conduct and its application is encouraged to work directly with their principal contact in NH Hotel Group to clear up such doubts.

6. Related Documents

- NH Hotel Group, S.A. Code of Conduct
- Coperama Code of Conduct
- NH Hotel Group, S.A. Procurement Policy
- NH Hotel Group, S.A. Sustainability Policy
- NH Hotel Group, S.A. Environment and Climate Change Policy
- NH Hotel Group, S.A. Anti-Fraud and Corruption Policy
- NH Hotel Group, S.A. Money Laundering and Terrorist Financing Prevention Policy

7. Change History

Version	Reviewed by	Approved by	Date
1.1	Coperama and Sustainability Department	Executive Sustainability Committee	07/12/2023