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1. FOREWORD

For Jan Hotels, a family-operated business, it is vital that we all speak the same language and apply the same principles, thus reinforcing and upholding our values. We are convinced that all our dealings should be conducted honestly, transparently, fairly, and with respect for others, their dignity and their rights. These principles are binding for all employees!

In all business dealings, every employee* is obliged to comply with the applicable company-specific and legal regulations and to actively promote the implementation of the Code of Conduct. The Board of Directors and the Management are particularly responsible for setting a good example and for addressing any problems encountered by employees and external contacts relating to proper conduct with due care and respect. Line managers are to ensure that the employees answerable to them are acquainted with the content of the Code of Conduct and that they observe the rules and behavioral principles applicable.

Behavior that contravenes the principles of the Code of Conduct will not be accepted - such behavior can have serious implications for employees and company alike.

No employee shall be disadvantaged, neither for adhering to the conditions of the Code of Conduct, nor for informing the board of directors, human resources department, or a line manager about potential abuses or conflicts.

We all play a major role in the success of our company. Our grateful thanks to each and every one of you for your ongoing commitment, efforts and endeavors to comply with our standards at the highest level.

On behalf of Jan Hotels

Mikael Horal
Chairman of the Board

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* The shorter male form is used throughout this document for ease of readability. At this juncture we would like to emphasize that this is merely a simplification measure and that the content is addressed equally to male and female employees alike.
2. OUR VALUES

We are a family-operated business; we vouch with our own name for the service our hotels provide.

Our aims are committed and qualified employees, providing a service that meets the individual needs of our guests, and securing our commercial success for years to come.

We aim to create a working environment for our employees that is characterized by honesty, reliability and fairness. Founded on these values, we are confident of achieving the long-term success of Jan Hotels.

BUSINESS SUCCESS
We aim to strength our commercial success for years to come and achieving the budget.

TEAM WORK
Together everyone achieve more. We are not the team because we work together, we are a team because we respect, trust and care for each other.

CUSTOMER CARE
We exceed the expectations of our guests, we provide excellent services with an emphasis on personal approach.

RESPONSIBILITY
We are responsible in our approach to work, colleagues and clients.

OPEN DIALOGUE
We support open dialogue.

COURAGE
We support the initiative of our employees, we are open to new ideas.

MOTIVATION
We motivate our employees to achieve better working results and offer the possibility of professional growth within the company.

DEVELOPMENT
We support the personal and professional development and education of our employees.
3. PROMOTING EQUAL OPPORTUNITIES
   – NO DISCRIMINATION OR HARASSMENT

Jan Hotels expects every employee to treat colleagues and third parties in a friendly, objective and fair manner. No-one may be unfairly treated, harassed, disadvantaged, shown favor, or ostracized on the grounds of race, ethnic background, skin color, nationality, religion, philosophy, gender, physical constitution, disability, age, appearance or sexual orientation.

The same applies to our principles on equal opportunities. Should conflicts arise, the relevant line manager or human resources is to be informed. The personal dignity, private life, and rights to personal privacy of each individual employee are to be respected. Discrimination - in whatever form - will not be accepted.

Harassment in all its forms is not be accepted at Jan Hotels. Harassment is understood to mean verbal, physical or visual acts, the purpose or intended impact of which is to create offensive, hostile or threatening situations.
4. CREATING GOOD WORKING CONDITIONS
– GUARANTEEING HEALTH AND SAFETY

Jan Hotels is committed to providing its employees with a good, safe and healthy working environment. We ensure our employees receive commensurate remuneration. Jan Hotels undertakes within a framework of equal opportunity to encourage the development and best possible deployment of employee talents, and to select, train and promote employees fairly according to their performance and dedication. As far as is legally permissible, we recognize the right of employees to freedom of association; employees who belong to workers‘ organizations or unions will neither receive preferential treatment, nor will they be discriminated against.

The protection of employee and business partner personal data is of paramount importance.

Jan Hotels assumes responsibility for the health and safety of its employees. We attempt to avert every risk, ensuring the best possible steps are taken to prevent accidents and occupational diseases. Every employee is mutually responsible for protecting other people and the environment in his sphere of influence. All the appropriate laws and regulations must be observed. Managers undertake to assist and support their teams in perceiving this responsibility. Accidents occur as a result of negligence. All employees should be acquainted with the health and safety regulations relating to their place of work. Unsafe working practices must be reported to the line manager.

Safety also means that the working environment is free of violence. All employees have the right to fair, courteous, and respectful treatment by their line manager and colleagues. Bullying will not be accepted. This also specifically includes behavior intended to undermine the dignity of the person targeted, or an environment designed to intimidate, breed hostility, humiliate, debase or insult. Threats and violence will not be accepted and will have direct consequences for the perpetrators. The consumption of drugs and alcohol by employees is also strictly prohibited during working hours. The influence of alcohol, illegal drugs, or the improper consumption of medication in the workplace poses a danger to the employee in question and those around him, and is grounds for immediate dismissal.
5. SUPPORTING HUMAN RIGHTS

Employees will not be required to relinquish any collateral to their employer - either in the form of identity papers, money or other sureties.

6. SUSTAINABILITY, ENERGY EFFICIENCY AND ENVIRONMENTAL PROTECTION
- RESPONSIBLE USE OF RESOURCES

The responsible use of energy and natural resources is assuming increasing importance in the commercial world. Jan Hotels undertake to minimize environmental impact and optimize environmental protection:
- The prevention, reduction, or recycling of waste takes priority over its correct disposal or incineration.
- We regard it as our duty to promote environmental awareness among our employees and to motivate them to act in an environmentally aware manner.

7. CORRUPTION AND UNFAIR ADVANTAGE

Donations are permitted if they comply with our standards, are common business practice, and ethically beyond reproach. Corruption and the affording of unfair advantage - whatever form this may take - is prohibited. Within the context of our business activities, no personal advantage may be demanded, accepted, offered, or conferred. Corruption is at odds with fair competition and puts Jan Hotels at economic risk, while also compromising its reputation.

8. NURTURE OF RELATIONSHIPS WITH CLIENTS, SUPPLIERS AND PARTNERS
- NO CONFLICTS OF INTEREST

We pride ourselves on cooperating with our customers, suppliers and partners in a respectful, friendly and reliable manner. Our dealings with our business partners are based on honesty, transparency and fairness - both in what we say and what we do. Every employee is expected to keep his own personal interests and those of Jan Hotels strictly separate from each other. Decisions are made using objective and neutral terms of reference, such as quality, reliability and competitive pricing. A conflict of interests is said to exist if the personal interests of an employee may impact on or damage those of the company.
9. DONATIONS AND SPONSORSHIP

We only make donations on a voluntary basis and not with the aim of obtaining commercial benefits. Donations are granted within a legal and economic context to promote education, science, culture, social causes, sports and the environment. Transparency is crucial when making donations; the purpose of the donation, recipient details, the recipient’s receipt of donation must be documented for traceability at all times. Donations which might affect the interests or damage the reputation of Jan Hotels may not be granted. Jan Hotels uses sponsorship payments as a marketing tool. Through sponsorship we support sport, culture, education and science. Every sponsorship requires the sponsorship partner to undertake appropriate and verifiable advertising and marketing activities; this process is to be handled transparently.

10. SAFEGUARDING BASSETS

Employees are not allowed to use corporate resources for their own purposes, unless this is expressly permitted in the terms of their employment contract, in a separate agreement, or by their line manager. Jan Hotels expects its employees to handle the company’s assets responsibly.

11. PROTECTING OUR TRADE SECRETS AND THE CONFIDENTIALITY CONCERNS OF OUR BUSINESS PARTNERS AND GUESTS

Every employee undertakes to handle company property in a responsible manner. The long-term success of our business depends on our expertise and innovations. Trade secrets may neither be passed to third parties nor even published without the appropriate legal safeguards. Furthermore we also need to protect the confidentiality concerns of our business partners against unauthorized third-party access, as well as ensuring customer confidentiality is maintained. Jan Hotels constantly strive to guarantee the ongoing confidentiality all guest data. We aim to prevent any negligent handling of data and thus the unintentional transfer of information. All employees are expected to protect the data resources associated with their workplace against unauthorized third-party access.
12. CONTROLLING

Jan Hotels fully concur with and applies the principles of legal, comprehensive and honest accountancy. We ensure that all business data - in whatever form - is recorded precisely, clearly, promptly and comprehensively, all the commonly recognized principles referring to proper accounting, as well as with the regulations governing book-keeping and financial reporting. All employees responsible for the provision of information must ensure they submit comprehensive reports characterized by accurate content. All the relevant rules, guidelines, and regulations must be adhered to as a matter of course. All records and files must be managed in such a way that deputizing is possible at any time. Legal retention periods must be complied with.

13. THE „INNER COMPASS” AS AN AID TO DECISION-MAKING

Should you be uncertain whether a decision complies with the requirements as set out in our Code of Conduct, it can be helpful to answer the „inner compass” questions - these provide guidance to permissible behavior:
• Is my conduct legal and in compliance with internal guidelines?
• Is my behavior in the best interests of the company and free of conflicting personal interests?
• Am I being true to my own personal values and those of the company?
• Could I defend my decision in the public domain? And would it stand up to third-party scrutiny?
• Would I be prepared to take responsibility for it?
• Does my conduct reaffirm the good reputation of Jan Hotels?

If you have answered “Yes” to all these questions, then your behavior is very likely to be correct. Should you have any doubts concerning any of these questions, please seek qualified advice in HR department.
12. CONCLUSION

Companies are facing new challenges as they seek to comply with legal and ethical principles in particular. What companies say and do is playing an increasing role in how they are assessed. With the principles laid down in this Code of Conduct, Jan Hotels have set out the ground rules for ethical and legally irrefutable behavior. It is not enough, however, for this document to exist: we can only achieve positive change if we „live” and adhere to this Code of Conduct in our daily business dealings. If you suspect or know that an action, or the lack thereof, constitutes a breach of the Jan Hotels Code of Conduct, you are obliged to communicate this to the HR department without delay.

The first point of contact for every employee in the case of questions and/or uncertainties relating to the Code of Conduct is the HR Department. HR Department is on hand to give preventative advice in the case of questions and whistle blower. Each case reported will be handled discreetly and - upon request - anonymously.