



CODE OF CONDUCT

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.

We interpret compliance as the correct conduct of our company and our employees - in a legal, business and ethical sense. The Code of Conduct underpins our corporate philosophy, specifying the standards of conduct with which we engage in the business.

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 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

Eytan Goldman
Managing Director

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Hotel Růže

www.hotelruze.cz



OLDINN

www.hoteloldinn.cz

Hotel Leonardo
P R A H A

www.hotelleonardo.cz

Hotel Carol

www.hotelcarol.cz



Hotel Duo

www.hotelduo.cz

* 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.

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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.

INOVAČE | INNOVATION

VÝZVY ŘEŠÍME
KREATIVNĚ

We are creative
in solutions

AMBICE | AMBITION

CHCEME BÝT
STÁLE LEPŠÍ

We are motivated
to improve

RESPEKT | RESPECT

NAVZÁJEM SE
RESPEKTUJEME

We respect each other

SPOLUPRÁCE | COOPERATION

ÚKOLY PLNÍME
TÝMOVOU PRACÍ

We get things done
by teamwork

EMPATIE | EMPATHY

NASLOUCHÁME
VAŠIM POTŘEBÁM

We are listening
to your needs

I ♥ CARE
JAN HOTELS

MONDAY FOR
♥
INNOVATION

We are creative
in solutions

TUESDAY FOR
♥
COOPERATION

We get things done
by teamwork

WEDNESDAY FOR
♥
AMBITION

We are motivated
to improve

THURSDAY FOR
♥
RESPECT

We respect each other

FRIDAY FOR
♥
EMPATHY

We are listening
to your needs

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 to 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.

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 has set up various safeguards to prevent the unauthorized collection, processing, and use of data. This means, among other things, that access to personal data is restricted to company employees with the appropriate authorization, and with a clear business need to gain access. Employees with the relevant authorization must handle data in an appropriate and confidential manner.

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. Taking a variety of approaches we offer training courses which ensure that all employees are educated in occupational safety. These standards and safety regulations must be observed.

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.

SUPPORTING HUMAN RIGHTS – NO CHILD OR FORCED LABOUR

Jan Hotels does not tolerate child or forced labor.

No-one under 18 years old will be given night employment, be expected to carry out dangerous work, or work in dangerous conditions. In this context, “child” refers to anyone under 15 years. Employees will not be required to relinquish any collateral to their employer - either in the form of identity papers, money or other sureties.

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. Companies are no longer merely assessed according to their financial results, but also in terms of their level of environmental and social engagement. Jan Hotels undertake to minimize environmental impact and optimize environmental protection:

- We make every effort to keep our health/environment-related emissions to a minimum.
- 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.
- We define environmental protection as acting responsibly towards other people, animals, society and the natural world, regarding this as crucial to securing the future of our business.

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.

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.

POSSIBLE CONFLICTS OF INTEREST:

- Contracts awarded to related individuals (family, friends, and private business partners)
- Contracts awarded to companies, in which related individuals work or in which they own an interest over 5%
- Contracts with third parties signed, extended or terminated owing to personal interests or material/immaterial advantages
- Secondary employment with a competing company or business partner
- Employment offered to related individuals (family, friends, and private business partners)

Every employee is obliged to inform the line manager and HR department of any possible conflict of interest. Following such disclosure, Chairman of the Board is empowered to decide whether to approve the business process in question.

DONATIONS, SPONSORSHIP AND POLITICAL CONTRIBUTIONS

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. When it comes to political parties and individual politicians, Jan

Hotels shall make neither financial donations nor donations in kind that exceed either legally permissible or socially accepted norms.

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.

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.

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.

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.

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 irreproachable 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.