



BEACHCOMBER
RESORTS & HOTELS

CODE OF ETHICS AND CONDUCT



CODE OF ETHICS AND CONDUCT INDEX



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Dear Artisans,

At Beachcomber Resorts & Hotels, our legacy as the pioneer and leading hotel group in Mauritius is built on our unwavering commitment to ethical business practices.

Our Vision

The beauty of a place inspires the beauty of the heart; the beauty of our resorts is enhanced by the quality of our service and the kindness of our teams.

Our Mission

As a Mauritian company, and pioneer of the hospitality industry in Mauritius, we are aware of the gift nature has given us: to live in one of the most beautiful islands of the Indian Ocean. We have chosen to share this gift with the world by creating a family of resorts, giving our Guests the opportunity to live exceptional moments.

Our Raison d'Être

Creators of happiness, we embody Mauritian hospitality with generosity and simplicity.

We embed our guiding principles into every decision and interaction, bringing them to life through our four core values:

Respect: We believe that mutual respect is the foundation of strong and lasting relationships. By listening attentively, welcoming others with openness, and fostering a pleasant environment, we nurture a culture of trust and kindness.

Lakorite* [Kr]: Togetherness is at the heart of everything we do. By valuing differences, fostering collaboration, and expressing gratitude, we strengthen our bonds and grow as a community.

* [la•ko•ri•té]

Lakorite is a uniquely Mauritian bond—more than harmony, deeper than friendship. It is the unspoken connection that brings us together, a shared sense of unity, care, and belonging—the heart of our island's warmth and hospitality.

Evolution: Continuous learning and innovation shape our future. We embrace curiosity, share knowledge, and turn challenges into opportunities for growth.

Excellence: Exceeding expectations is a promise we uphold every day. Through attention to detail, constructive feedback, and a commitment to quality, we create exceptional experiences.

Our Code of Ethics and Conduct reflects the Group's vision and dedication to responsibility, integrity, and transparency, safeguarding the interests of all our stakeholders: Artisans, Guests, Suppliers, Shareholders, and business partners. More than a guideline, this Code stands as our pledge to the highest standards of ethical conduct.

We appreciate your time in reading and embracing our Code of Ethics and Conduct. Your commitment ensures that together, we continue to cultivate the Art of Beautiful in all that we do.



Stéphane POUPINEL DE VALENCÉ
Chief Executive Officer
New Mauritius Hotels Limited

3 February 2025

1. INTRODUCTION

1.1 WHY THIS CODE?

The present Code of Ethics and Conduct (the “Code”) reflects the values which we, the Board of Directors and Artisans (Employees) of New Mauritius Hotels Limited, and its wholly owned subsidiaries, (the “Company” or “NMH”), believe will guide us in making decisions.

- We believe in an ethical business approach to continually develop and maintain trust:
 - between Artisans and our Guests;
 - between Artisans and our business partners, including suppliers;
 - between NMH and the community;
 - among us, Artisans; and
 - between each Manager and his/her direct reports.
- We undertake to avoid and reject any non-ethical conduct which would prejudice our Company’s reputation.
- We understand that such non-ethical conduct will have serious consequences with regard to NMH’s performance.

No code of ethics and conduct can foresee and define ethical behaviour for every single situation; the basic rule should be to resort to honesty and integrity in any circumstance. Being ethical in one’s action means always making the right choice in all circumstances, even when one is not being watched.

1.2 WHO DOES THIS CODE APPLY TO?

All our Artisans (including Directors) without exception.

The Code may also be applicable to short term, contractual relationships, subject to the terms of the said contract, for any other relevant terms, including the provisions of the “NMH Ethics and Compliance Standards for Suppliers”.

Various other stakeholders of our business (Guests, Suppliers, Shareholders and Investors, and the Community at large) will have access to this Code.

1.3 OBSERVING AND APPLYING THE RULES AND GUIDELINES

This Code does not supersede the laws in force and related rules that the Company and all its Artisans have pledged to observe.

Failure to comply with the rules and principles of this Code will result in consequences that could lead to disciplinary action. Serious breaches could lead to dismissal for serious misconduct and/or legal prosecution.

1.4 OUR CORE VALUES AND THE BEACHCOMBER WAY

This Code is consistent with our Mission Statement, The Art of Beautiful, and with the four Beachcomber Values, which it advocates, extends and reinforces. Each Value is linked to a set of behaviours, the Beachcomber Way. This means that each Artisan, at the heart of the Company, acts upon it. This is what is expected from him/her.

2. MY PERSONAL BEHAVIOUR

- I value the Human being.
- I build positive and lasting relationships, based on Trust.
- I remain just and fair in all circumstances, within the confines of the authority vested in me.
- I do not abuse the power assigned to me.
- I firmly reject all forms of harassment or abusive treatment.
- I reject any suspicious or illegal behaviour be it fraud, subjugation or corruption.
- I maintain a watchful eye for risks, I avoid them and report instances of such behaviour when made aware of them.

3. ACTING WITH INTEGRITY

3.1 CORRUPTION

Corruption occurs when a person offers, accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification or doing or abstain from doing an act in the exercise of his/her duties.

- (a) It is forbidden to offer, give, solicit or receive any form of bribe, discount or whatever reward whether it be for the purpose of expecting a favour or as a favour given to a third party.
- (b) An Artisan can neither accept a gift nor a perk from present or future suppliers, except possibly low value promotional goods¹.

Gifts/perks here include anything that has not been formally disclosed as part of the relationship. For example:

- providing hotel facilities (including room nights, meals, drinks, etc) where the receiver does not pay full market value. It is understood that this does not include facilities offered as part of a normal commercial relationship (trade exchange), which has been properly documented, and for which due consideration has been / will be received by NMH. For example, hotel nights offered to a Guest Chef during a promotional activity.
- receiving cash, free services, discounts, etc from suppliers.

This may be construed as non-ethical behaviour, as it could prejudice or seem to prejudice our ability to make fair and objective decisions.

You are therefore expected to abide to the following:

- The Artisan must disclose to his/her line manager of any:
 - (a) attempt by a stakeholder to provide a gift and/or entertainment, including any sort of tangible or intangible benefit (e.g., free construction works, free bottle of wine, discounts which are not offered to other clients of the supplier, etc); and
 - (b) gift received,
except for possibly low value promotional goods¹.

The line manager will inform the People & Culture Manager for cases other than low value promotional items, who will update the 'Gifts Register'. Complex cases must be referred to the General Manager, and as applicable, to the Chief People Officer and Group Legal Counsel. As a general principle, when the Artisan is in doubt, he/she should refrain from accepting any gift.

It is the Artisan's duty to inform Management of any offer or solicitation which could tarnish his/her or the Company's integrity.

Any business transaction negotiated or devised with a member of various authorities or public service, must be in a way that will not put at risk the latter's integrity or reputation or that of the Artisan's colleagues or the Company. Any transactions not properly conducted could lead to criminal or civil sanctions.

3.2 RESPECTING COLLEAGUES AND GUESTS

- We commit to a workplace that is safe and secure in conformity with the laws, rules and regulations.
- We understand that it is strictly forbidden to come to work under the influence of alcohol or any harmful drug or substance.
- In compliance with laws and in respect to our colleagues and Guests, we will not use, own, distribute, buy or sell illegal substances when we are at the workplace.
- No Artisan may take part in or carry out acts of violence, threat, harassment, or abuse in whatever form, whether verbal, physical, psychological or emotional.

NMH has a zero tolerance to the above and any breach will be subject to disciplinary procedures.

¹ "Low value promotional goods" here refers to branded, low-value products such as pens, diaries, mugs, calendars offered by suppliers to NMH staff on special occasions.

3.3 CONFLICTS OF INTEREST

There is a “conflict of interest” when one’s activities outside the workplace or one’s personal interests are not in line or do not seem to be in line, in whatever form, with that of the Company’s, or even, if those activities or interests may impair one’s judgement or can affect one’s decisions when performing one’s duties within the Company. For example, accepting or undertaking work outside the Company and with a supplier can lead to a conflict of interest.

Artisans should not take a secondary employment, (including part-time and occasional contracts), or directorship, unless this has been declared in writing to the People & Culture department (P&C). For clarification, subject to prior written permission from the P&C, an Artisan may have a secondary employment provided that:

- That secondary employment does not/will not take place during his/her working hours at NMH,
- The nature of the work does not/will not affect his/her physical or mental ability to perform his/her duties,
- His/her clients or colleagues at his/her other employment or company do not communicate with the Artisans involved at NMH,
- The Artisan must not use, at any time, equipment or other supplies belonging to NMH, nor the time of other Artisans in the performance of that secondary employment,
- The Artisan must not promote goods or services of the other company to other Artisans during working hours, and
- The secondary employment must not result in a conflict of interest/cause prejudice to the interests of the Company, and should not take place at a competing establishment, in a similar position. A Disclosure of Interest Form is available from the P&C department and shall be submitted to the P&C Manager.

Furthermore, a potential conflict of interest will automatically arise when an Artisan starts a private company involved in commercial activities and/or becomes director and/or shareholder of such a private company. Prior to pursuing a directorship and/or acquiring shares in a company engaged in commercial activities, a disclosure to the P&C should be made. In cases of any such existing directorship or shareholding, please promptly notify the P&C.

For the purpose of this section, companies created as a holding company, for property-related activities, holding shares in listed companies, and other non-commercial activities are excluded.

An Artisan may start a private company involved in commercial activities and/or may become director or shareholder of such a private company, provided that:

- Disclosure in writing to P&C has been made and Artisans undertake to work with P&C, Internal Audit or any other department in detecting and reporting potential conflict of interest situations and related party transactions.
- Artisans have informed the procurement department at the Company’s Head Office, (the “Procurement Department”) in writing should they become aware that relatives² are involved³ in supplying goods and services to the Company. The only objective here is to ensure, should there be any such situation, that the said Artisan is not involved in the specific procurement process. A Disclosure of Interest Form is available from the P&C department and shall be submitted to either directly the Procurement Department or to the P&C Manager, who shall remit the said form to the Procurement Department.
- Any Artisan wishing to start a commercial activity, and/or who becomes director/ shareholder/part-time employee in a company engaged in a commercial activity will be asked to sign a Disclosure of Interest Form.

3.4 INSIDER TRADING

“Insider Trading” is an offence made by an individual who uses privileged and confidential information gained during the performance of his/her duties, about the Company, its Guests or its suppliers, with the aim of getting an unfair edge for the purposes of acquiring or disposing of shares or other assets.

The term “privileged information” generally means any information which, if known in the public domain, would influence a rational investor’s decision to buy, keep or sell his/her shares in the Company.

Artisans are reminded that it is illegal to give to anyone privileged information not known to the public, except to those who should have the information at hand in order to carry out their work. Insider trading is subject to prosecution.

² “Relatives” here refer to spouse/partner, children, brothers, sisters, and parents, including in-laws.

³ “Involved” here refers to being a director, shareholder or senior employee of the supply company, having influence in decision making.

3.5 POLITICAL CONTRIBUTIONS AND ACTIVITIES

The Company's funds, assets or services used by one of its Artisans as political contribution to political parties, candidates, campaigns or any political activity is strictly forbidden except where permitted by legislation and by the Company's Board of Directors.

An Artisan may be involved in political activities only in his/her own name and not as a representative of the Company.

4. PROTECTING AND MAKING GOOD USE OF DATA AND I.T. RESOURCES IN OUR CUSTODY

- We recognise the value of data and information held by the Company and we use it responsibly.
- We safeguard that information from non-authorised propagation, modification or destruction as well as from theft and loss.
- We comply with the laws and regulations in relation to Data Protection. We understand and will abide to the strict laws and regulations applicable in relation to the protection of personal data for Artisans, Guests, Suppliers and other stakeholders.
- Any Artisan with access to that information should, in no circumstances divulge it to unauthorised parties. He/she must take all necessary steps to protect its confidentiality. This includes refraining from talking about the Company's affairs in public, or in public places or on the telephone.
- We use I.T. resources at our disposal in a responsible manner.
- Great care is exercised when sending any confidential document electronically.
- Information distribution and communication through social networks, whether written or in graphic form (e.g., photos), regarding the Company, its Guests, its affairs or the Artisan's professional activities or his/her team should be in line with our Artisans' Guidelines for Social Media.
- Artisans should strive to use social media responsibly and in a positive way. We, therefore, keep careful watch on the effect that our involvement with those media could have on our Company's image and its relationship with its partners, competitors, Artisans, present, potential or past and with the public at large.
- We take good care to protect the image of our Company, its reputation and its brand when we publish on social networks, and we endeavour to adopt a duty of discretion and restraint. We do not express opinions which could damage our Company, its image, its reputation and its brand.
- This commitment to protect the Company information stays in force even after leaving the Company for whatever reason.

5. SAFEGUARDING THE ASSETS OF THE COMPANY

- We protect the assets of the Company and ensure that they are used efficiently and responsibly. Such assets include land, buildings, plant, equipment, machines, tools and financial assets as well as intellectual property and confidential information.
- Theft, negligence and waste are factors that impact directly on the Company's profitability, its reputation and, ultimately on our jobs.
- Materials and supplies belonging to the Company are to be used solely for the purposes of its activities. Any other use must be authorised in writing and by an immediate superior, provided that all Company procedures are duly respected such as that of the Gate Pass Procedure which governs the movement of Company assets.
- Equipment, computer programs and any other I.T. resources are essentially for professional use. Their use for personal purposes is allowed provided that such use does not hinder our professional obligations and the Company's performance.
- We neither look for nor transmit or keep offensive and illegal data.

No Artisan may, without authorisation, sell, rent, give away or otherwise dispose of Company's materials. Any infringement will constitute a serious breach that could be followed by disciplinary action and prosecution.

6. CARING FOR OUR ARTISANS

6.1 EMPLOYMENT

Our criteria for employment, remuneration and promotion are driven by competencies, performance and behaviour that are in conformance with our Values.

We shall treat all our Artisans with dignity, respect and compassion to foster a trusting work environment free of harassment, intimidation and unlawful discrimination.

Artisans should refer to the Artisan Handbook, ('Livret D'Accueil'), for full details of the Company's Policy in relation to employment, as well as our Equal Opportunity Policy which is annexed to the Code.

6.2 PROFESSIONAL ENVIRONMENT

- We believe that difference amongst people is a source of inspiration and enrichment.
- We accept individual differences and understand that therein lies a source of inspiration and growth.
- NMH strives to communicate honestly with its Artisans and share any information transparently. The Company endeavours to listen carefully to any suggestions, ideas, requests and grievances and follow them up whenever necessary. It seeks to provide maximum feedback to its Artisans, helping them to perform to the best of their abilities.
- NMH enters into negotiations in good faith whenever they are necessary and maintain good relations with unions, their members, delegates and negotiators whilst respecting collective agreements.
- We take all necessary precautions to protect our colleagues and Guests against accidents or diseases which could occur in the workplace.
- We encourage members of our teams to find a good work-life balance and continuously strive to adapt work schedules and environment to their needs and expectations.

6.3 LEARNING AND DEVELOPMENT

We believe that it is our duty and in our interest that we continually develop the competencies and the know-how of all our Artisans to keep pace with the development of their trade and that of the local and international hotel industry. We encourage each Artisan to extend and enhance his/her competencies and know-how and offer advice, support and training.

It is expected that every Artisan fully seizes those opportunities and encourages his/her colleagues to do so as well.

It is also a key role of every Artisan at NMH, whatever his/her level, to motivate the members of his/her team(s), individually or collectively, to thrive in their job. He/she should also engage with his/her team members with regular feedback sessions to discuss performance as well as career development.

7. SERVING OUR GUESTS WITH PERSONAL ELEGANCE & GRACEFUL LIVING

- We consider service to our Guests to be an Art, the Art of Personal Elegance & the Art of Graceful Living in all its forms. This is part of our Core Values and is in our best interests.
- Our care and service are of the very best quality and in every way efficient, courteous, focused and in line with our standards of Personal Elegance & Graceful Living.
- We constantly innovate to be able to provide service aimed at securing Guest loyalty.
- We treat our Guests dutifully and honestly, providing them with a service commensurate with the promises that we have made, fulfilling their expectations and even surpassing them whenever we can.
- We give our Guests accurate, exact and reliable information.
- We are sensitive to the needs of our Guests and listen to their feedback and we remedy their dissatisfactions and grievances with efficiency, transparency and fairness.
- We ensure the safety and comfort of our Guests at all times.
- We respect and safeguard confidential information regarding our Guests and ensure that such information is handled with accuracy and responsibility.
- We treat all our Guests with dignity, fairness and impartiality whilst respecting their integrity and culture.

8. BUILDING LASTING SUPPLIER RELATIONSHIPS

- We develop and foster healthy and long-standing relationships with our suppliers, based on trust and respect.
- We choose products and services that will contribute to the long-term prosperity of our Company.
- We are equitable when choosing our suppliers and are honest in our relations with them, whilst ensuring that decisions made are anchored on objective standards with regards to competitiveness in price, quality, responsiveness, reliability, payment terms, service, business practice, social and environmental, and reputation amongst other things.
- We adhere to the agreed terms, including payment terms; we honour our commitments.
- We attempt to avoid unwanted constraints or disputes affecting those relationships.
- We look for, favour and choose suppliers and sub-contractors whose values and business practice are similar to ours. We expect our suppliers to understand and adopt the latter.

9. CARING ABOUT THE ENVIRONMENT AND THE COMMUNITY

- We care about the future of the planet and the communities within which we operate. We respect our environment, ecologically and socially, and strive to lead by example towards finding solutions that will promote its preservation and sustainable growth.
- We strive to commit to programs which aim at constantly improving the environment and preserving its natural resources.
- We are committed to different social projects, and it is our wish to sensitise our Artisans and invite them to measure the effect of their actions and to keep them involved within the Company's social and environmental projects.

In that respect, NMH has adopted those principles as expressed by Earthcheck, an international organisation which acts as auditor and certifies the achievement of progressive and voluntary objectives.

10. OBSERVING THE CODE OF ETHICS AND CONDUCT

Observance of the Code is mandatory for all our Artisans.

- The General Managers and Heads of Department must ensure that all their Artisans read, understand, sign and apply it.
- It is the duty of each Artisan having staff reporting to him/her to ensure that there is no breach of the Code committed by their direct reports.
- It is the duty of each Artisan and NMH partner to report any possible breach of the law, of a rule or of any provision of this Code.
- Each Artisan (Management included) will have to reiterate having read and understood the Code – when it has been updated – and will commit to observing it.

10.1 REPORTING BREACHES TO THE CODE OF ETHICS AND CONDUCT

It is the duty of each Artisan and NMH stakeholder to report any evidence that he/she is being asked or influenced to act against the provisions of this Code, or he/she knows, or has a doubt or suspects a possible breach of the law, of a rule or of any provision of this Code.

NMH commits never to sanction or discriminate against an Artisan or NMH partner who reports a possible breach in good faith.

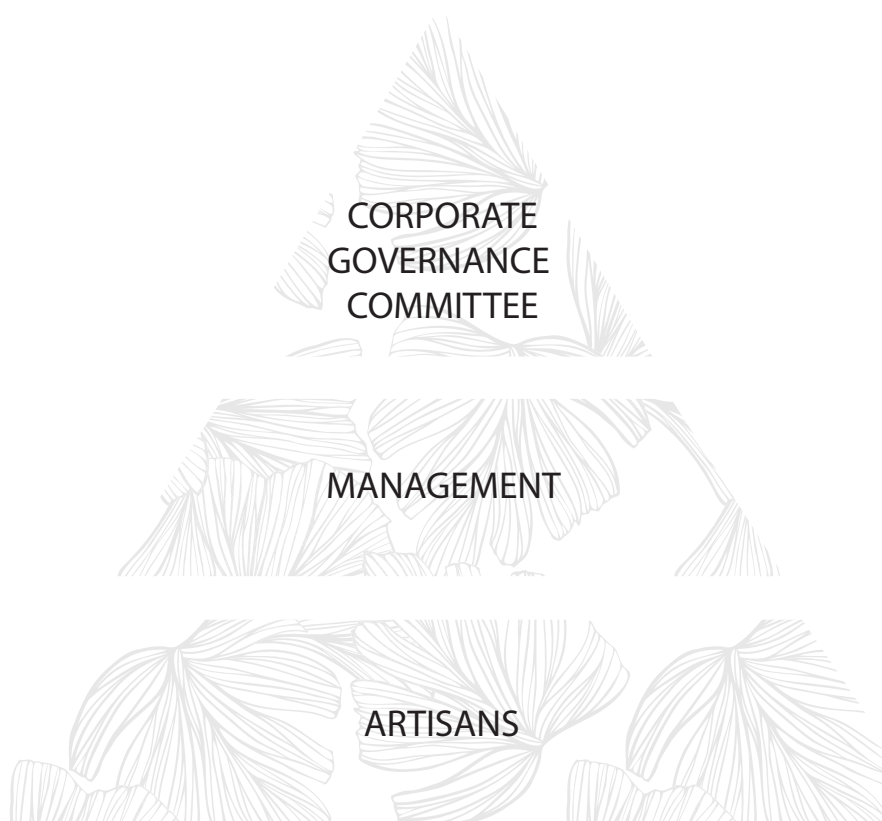
It is not acceptable that an Artisan or NMH partner be sanctioned or discriminated against or be subject to any form of retaliation because he/she has made such report.

Artisans can report any potential breach to his/her immediate supervisor.

If this is not possible/appropriate, the Artisan should contact the P&C, the Head of P&C of its business unit or the Chief People Officer & Group Legal Counsel – see Section 11 below.

10.2 GOOD GOVERNANCE AT NMH

STRUCTURE



- The Corporate Governance Committee ('CGC'), delegated by the Board of Directors, has ownership of the Code of Ethics and Conduct (the 'Code'). It monitors the application of the Code and ensures that it stays aligned with NMH's needs and Values.
- The CGC receives reports of breaches, arranges for investigations and monitors progress.
- The CGC's remit includes supporting investigations following the receipt of anonymous letters.
- However, the implementation of the Code is also the responsibility of Members of Management. The latter will promote widespread adherence to the Code, through their supervisory role. In addition, they will lead by example, offer advice to Artisans, as required and ensure Artisans of all levels understand and apply the Code.
- Members of Management receive and deal with grievances or problems that are brought to them.

11 WHISTLEBLOWING

The procedure and the guarantees explained above (Section 10.1 above) should suffice so that any Artisan who has the feeling that he/she is led to act against the provisions of the Code, or who is made aware, or has a doubt or suspicion that there has been a breach of a law, a rule or of the provisions of this Code, should be comfortable to report same without fear as per the procedure below.

Over and above these procedures, the Company also wishes to provide Artisans with a Whistleblowing process - another avenue to disclose in good faith any activity within NMH which the said Artisan feels is illegal, immoral, illicit, unsafe or fraudulent.

11.1 THE GENERAL PRINCIPLES OF WHISTLEBLOWING

- The Company will protect the identity of the whistleblower or reporter.
- The Company is committed to treat information given by whistleblowers in a confidential manner.
- The Company will not permit any retaliation against any Artisan or other person who, in good faith, has filed a complaint.
- The Company will not tolerate any attempt on the part of anyone to apply any sanction or disadvantage or to discriminate against a whistleblower who acted in good faith.

11.2 THE WHISTLEBLOWING PROCEDURE

Reporting as a whistleblower should be done as follows:

- (i) Information must be communicated in confidentiality to the Chief People Officer & Group Legal Counsel and/or the Chief Internal Audit Officer. Although, the whistleblower may choose to disclose the information anonymously and retain anonymity during the whole process, Artisans are strongly encouraged to disclose their identity and provide factual and verifiable information to ensure a thorough enquiry into the allegation.
- (ii) If the information has been obtained from another party, the details passed on must contain the name of the person who has received the correspondence/mail/information, the day, date and time of reception.
- (iii) The Chief People Officer & Group Legal Counsel and/or the Chief Internal Audit Officer will be responsible for keeping the information received and taking necessary steps in line with the internal investigation procedures.
- (iv) The whistleblower, if known, may be contacted for additional information.
- (v) Provided sufficient information has been received, the Company is committed to complete investigations relating to whistleblowing cases within a reasonable period of time from the date of receipt of the complaint.
- (vi) The whistleblower, if known, will be informed of the outcome of the investigation subject to confidentiality and legal constraints.
- (vii) Anyone who has submitted false, misleading or malicious information anonymously and who would have been formally identified will be subject to disciplinary measures, as well as any other legal action the Company may be advised.

12. APPENDICES

APPENDIX I

NEW MAURITIUS HOTELS LIMITED (NMH) ETHICS AND COMPLIANCE STANDARDS FOR SUPPLIERS

These standards apply to individuals/organisations that provide services, raw material, active ingredients, components, finished goods, or other products (“Suppliers”). Where they exist, the Supplier’s own written ethics and compliance standards may replace these Standards to the extent that they are not inconsistent with these standards and are incorporated into a written agreement between NMH and Supplier.

ADHERANCE TO APPLICABLE LAWS & REGULATIONS

- Suppliers must comply with the applicable laws, rules, regulations, and ethical standards of the country in which they operate, as well as these Standards.

PROHIBITION OF BRIBES, KICKBACKS, UNLAWFUL PAYMENTS, AND OTHER CORRUPT PRACTICES

- Suppliers are prohibited from directly or indirectly paying anything of value to a government official in order to:
 - Win or retain business or to improperly influence the act or decision of any government official, political party, candidate for political office, or official of a public international organisation;
 - Gain an improper advantage; or
 - Illegally influence the action of any individual, customer, company, or company representative.
- Suppliers are required to keep accurate and transparent records that reflect actual transactions and payments.
- While NMH observes local business customs and market practices, neither NMH nor any Supplier shall participate in any corrupt, unethical or illegal practices.

ACCURACY OF BUSINESS RECORDS

- All financial books and records must conform to generally accepted accounting principles.
- Supplier records must be accurate in all material respects.
 - Records must be legible, transparent, and reflect actual transactions and payments.
 - Do not hide, fail to record, or make false entries.

FAIR COMPETITION AND ANTITRUST

Suppliers must comply with all applicable laws and regulations regarding fair competition and antitrust.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- All Suppliers requiring the exchange of confidential information with NMH are required to execute a confidentiality agreement with NMH in advance.
- Exchange of confidential information is limited to that required to fulfill contracted performance requirements.
- Suppliers shall not share NMH’s intellectual property or confidential information or any other information that they acquire with respect to NMH’s business (including information developed by Suppliers and information relating to products, customers, suppliers, pricing, costs, know-how, strategies, programs, processes, and practices).
- Suppliers must immediately report unauthorised disclosure of NMH’s confidential information, whether inadvertent or not.

DATA PRIVACY

- Supplier must abide by applicable data privacy laws and regulations when handling personal information.
- Suppliers must immediately report unauthorised use, disclosure, or loss of NMH related personal information.

EMPLOYMENT PRACTICES GUIDELINES

- Suppliers must treat NMH and its own employees with dignity and respect.
- Suppliers must comply with all applicable employment laws and regulation including statutes prohibiting discrimination in the workplace.

- Suppliers shall not possess, use or sell illegal drugs on NMH property or perform their work under the influence of alcohol or illegal drugs.
- Suppliers will not produce or manufacture goods or services using forced or indentured child labour. Regular full-time employees are to be at least 18 years of age.
- Suppliers must disclose the existence of part-time work, summer jobs, or apprenticeship programs for individuals under the age of 18 to NMH's management.
- NMH does not permit intimidation or hostility and will not tolerate any behaviour from a supplier that might harass, disrupt or interfere with another person's ability to work.

CONFLICTS OF INTEREST

- A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interests of NMH. Some situations that could cause a conflict of interest include:
 - having a significant financial investment in any company that competes, does business, or seeks to do business with NMH. A significant financial interest includes voting control, or an ownership of more than 5% of the outstanding capital of a business, or an investment that represents more than 10% of the investor's total assets.
 - providing similar services for direct competitors of NMH, with access to confidential or competitive information.
 - when family members (or domestic partners, or those personally close to you) work for NMH, another NMH supplier, NMH customer or NMH competitor.
- Suppliers must disclose any apparent or actual conflicts of interest to NMH management. If NMH management approves an apparent or actual conflict, the approval decision must be documented.

MOBILE DEVICES, ELECTRONIC MEDIA, INTERNET AND E-MAIL USE

In those circumstances where Suppliers have access to NMH's electronic environment (Intranet, e-mail, voicemail or other), Suppliers shall:

- Protect NMH's confidential information and electronic media;
- Encrypt or password protect data;
- Keep mobile devices with them or locked while traveling;
- Comply with local data protection laws;
- Use these tools for NMH business purposes only; and
- Use these tools consistent with NMH Acceptable Use of Information and Technology Policy including:
 - do not knowingly download, view or forward materials of a discriminatory, harassing, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive nature. Electronic media must be primarily used for business purposes.
 - do communicate protected information (personal or trade secret) in a way that recognizes the sensitivity of the information, possibility of unauthorized access, and compliance to local data protection laws. Suppliers will be responsible for keeping NMH-given password(s) secret.
 - realize that documents, software, e-mails and other web pages could bring damaging computer viruses into NMH's network. Do not knowingly detach, decompress, run/launch or install any files or programs on NMH's systems or open attachments that have damaging computer viruses. Do not download or disseminate any material from the Internet unless the copyright owner has provided consent.
 - adhere to the timing and methods for retention and elimination of NMH Company data stored on electronic media.

TRADE COMPLIANCE

Suppliers must comply with the letter and spirit of all applicable import and export controls, sanctions, and other trade compliance laws of the applicable country(ies) where the transaction(s) occur(s).

ENVIRONMENT, HEALTH & SAFETY

- Suppliers are expected to comply with all applicable laws and regulations regarding environment, health and safety.
- Suppliers working with NMH or onsite at a NMH location must work in a way that assures their own safety and the safety of others and in compliance with applicable NMH and governmental environmental, health and safety requirements. Any emergencies that may impact NMH must be reported promptly.

GIFTS & ENTERTAINMENT

- Gifts and entertainment are not needed in order to conduct business with NMH and are highly discouraged.
- The following situations are always inappropriate and are expressly prohibited:
 - giving a gift, entertainment, or preferred treatment with the intention of trying to influence the decision making objectivity of a NMH employee.
 - offering any gift, entertainment, or preferred treatment while involved in a current purchasing or contracting decision process. (RFI, RFQ, RFP).
 - any gift of currency including “gift cards”.
 - offering entertainment where the Supplier will not be present/represented (e.g., sports/event tickets).
 - offering extravagant recreational outings, travel, or lodgings at Supplier sponsored events.
- NMH employees are not permitted to solicit suppliers for gifts including gifts to support charitable causes.
- Suppliers shall not offer an opportunity to purchase products, services, or a financial interest to any NMH employees under terms not available to all NMH employees.
- An Artisan can neither accept a gift nor a perk from present or future suppliers, except possibly low value promotional goods¹.

RESOURCES

- If you need additional information or guidance on these standards, or wish to report a potential violation, contact :
Jamil TAUJOO
Chief Internal Audit Officer
jtaujoo@beachcomber.com

¹ “Low value promotional goods” here refers to branded, low-value products such as pens, diaries, mugs, calendars offered by suppliers to NMH staff on special occasions.

APPENDIX II

BEACHCOMBER ENVIRONMENTAL AND SOCIAL POLICY STATEMENT



ENVIRONMENTAL AND SOCIAL POLICY

For over 40 years, Beachcomber Resorts & Hotels has prioritised responsible operations. This policy, outlined in our 52 Commitments Environmental & Social Charter and structured around eight pillars, drives our efforts and aligns with our 2025 plan to reduce our carbon emissions by at least 15%, using the financial year 2021-2022 as the baseline. As an EarthCheck Gold certified HO, we remain committed to enhance our Sustainability blueprint.

Our headquarters, located in Curepipe, encompass a total built surface area of some 4,900 square meters. This space includes 186 parking spaces, conference and meeting facilities, workspaces, stores, and a restaurant for our Artisans.

Our Sustainability Commitments can be proudly summarised as follows:

- We use water efficiently with the use of aerators optimising flow at 6 litres per minute and embrace rainwater harvesting.
- We choose less but greener energy with the promotion of natural lighting and efficient energy management such as motion detections.
- We manage waste responsibly by recycling plastic, cardboard, paper, cans, cooking oil, electronic waste and batteries, and segregating green waste with the objective of contributing to the group recycling rate of 60%.
- We focus on planting of endemic plants aligning with our target to achieving a pesticide-free environment.
- We foster community development by assisting and funding various NGOs with our Fondation Espoir Developpement (FED), empower Mauritian craftsmanship through sales of locally crafted products in our Boutique and maximise local employment with more than 90% of our Artisans living within a 20 Km radius of our office.
- We actively promote Fair Trade principles and prioritise environmentally friendly products through our Sustainable Purchasing Policy, fostering close collaboration with our suppliers.
- We foster eco-responsible behaviour among our Artisans through training, awareness programmes, and the active involvement of the HO's Green Team Committee.
- We value our Guests' contributions to our "Top FED Programme" in our hotels and their participation in various activities, including our local and cultural ritual "Beautiful Story".

At Beachcomber, we endeavour in continuously improving and achieving excellent results for our environmental and social sustainability performance. Our vision is underpinned by our full compliance with concerned legal requirements, including responsible land use, in addition to our rigorous annual benchmarking assessments in collaboration with EarthCheck.

Stéphane POUPINEL DE VALENCÉ
CHIEF EXECUTIVE OFFICER

December 2024



www.beachcomber.com

Note: This policy is a public document, that will be reviewed annually and openly shared to foster transparency and encourage collective action.

APPENDIX III

BEACHCOMBER EQUAL OPPORTUNITY POLICY

One of the common legal issues, which employers may increasingly be faced with, relates to the necessity of preventing discrimination at work.

The Equal Opportunities Act 2008, (The “Act”), requires organisations of the private and public sectors to publish an Equal Opportunity Policy and to ensure compliance therewith.

As it all boils down to a question of avoiding discrimination, let us first understand what is meant by the term. It may be defined as being bias or prejudice resulting in denial of opportunity or unfair treatment during recruitment or employment. It extends to unequal treatment provided to employees or prospective employees based on reprehensible illogical reasons. The Act terms those reasons status, and lists them as follows: age, caste, colour, creed, ethnic origin, impairment, marital status, place of origin, political opinion, race, sex or sexual orientation, and for the purpose of employment, includes the criminal record. These considerations are irrelevant to a person’s merit and only genuine criteria, such as qualifications. Skills, experience, competence, talent, performance, desire and willingness to work should therefore be considered.

Our Company has committed itself to building an organisation where people feel respected, valued and able to achieve their potential. It has always recognised the necessity of adopting fair practices in managing its human resources and in the discharge of its other corporate responsibilities. To that effect, it has introduced, since the early nineties, procedures for Selection and Appointment, Performance Appraisal, Discipline, Grievances and Complaints, as well as a Salary Structure and a Profit Sharing Scheme, all of which was done in consultation with the recognised Trade Union and included in Collective Agreements.

These procedures have generally well served their purpose and are known to employees, management and the Trade Union, and are available for consultation at any of the People & Culture Offices. Their guidelines and prescriptions are meant to avoid discrimination and are an integral part of the present Equal Opportunity Policy.

Those responsible to administer them have been duly trained. This Policy confirms levels of responsibility, further clarifies expectations and sets the scene for on-going training.

Principles of Application

- a) The General Manager and Hotel Manager of each Unit are responsible for ensuring the correct application of the Equal Opportunity Policy within the hotel.
- b) The People & Culture Manager of each Unit supports the General Manager and Hotel Manager in exercising this responsibility and dispenses professional advice accordingly.

It is the duty of the People & Culture Manager of the Unit to ensure that all People & Culture procedures and practices are in line with this Policy, to report non-conformances to his/her General Manager and Hotel Manager, as well as to the Chief People Officer & Group Legal Counsel, and to recommend corrective action.

The Chief People Officer & Group Legal Counsel has the overall responsibility to monitor the Policy and related People & Culture procedures to advise or report accordingly. He/she may be assisted in this task by the Internal Audit Department, who will do periodical checks and report any anomaly.

Department Heads, Managers and Supervisors are responsible for day-to-day operation of this Policy and need to ensure consistent interpretation and application thereof. They must make sure their staff know about, and follow, the Policy.

All Artisans are responsible for familiarising themselves with this Policy.

Artisans, particularly those in key decision-making positions should understand their responsibilities in the whole process of People & Culture Management and the importance of being able to justify their actions and decisions. Discrimination in the course of employment will be regarded with utmost concern and investigated fully. Appropriate measures will be taken wherever applicable. It is to be clearly understood that discrimination is a penal offence that the Company will not condone.

The effectiveness of the present Policy, as well as all People & Culture Management procedures and practices will be monitored and reviewed, amended or improved upon, as and when necessary.

Approved by



Stéphane POUPINEL DE VALENCÉ

Chief Executive Officer
New Mauritius Hotels Limited

3 February 2025

For further information, please contact the People & Culture Manager of your Unit.

APPENDIX IV

NEW MAURITIUS HOTELS LIMITED

ACKNOWLEDGEMENT OF RECEIPT, COMMITMENT TO AND OBSERVANCE OF THE CODE

I hereby accept having received and read a copy of the Code of Ethics and Conduct of the Company, New Mauritius Hotels Limited.

I have understood its meaning and I commit to act upon it.

As far as I know, I am compliant with the provisions of the Code.

Should I need clarifications regarding the Code or come across a matter which is contrary to the precepts of the Code, I will immediately get in touch with my immediate superior or the People & Culture Manager.

SURNAME

FIRST NAME(S)

MY BUSINESS UNIT

DATE

SIGNATURE



CODE OF ETHICS AND CONDUCT

