

SUPPLIER CODE OF CONDUCT



Supplier Code of Conduct

At Papagayo Curacao, we respect fundamental human rights, commit to a Human Rights Policy and Code of Business Conduct and Ethics, we recognize our responsibility to manage the environmental impact of properties, and contribute positively to the well-being of the community of Curacao.

This Supplier Code of Conduct outlines standards and expectations of how our Suppliers should conduct business in a manner that aligns with Papagayo Curacao values and commitment to responsible business practices. We expect our Suppliers to conduct business in accordance with high ethical standards, promote fair trade practices, comply with applicable laws and regulations uphold human and employment rights and demonstrate a commitment to reducing the environmental impact of their operations.

For the purposes of this Code, "Supplier" means any company, including its subcontractors and consultants, that sells, or seeks to sell goods or services directly to Papagayo Curacao. Papagayo also expects its managers/supervisors to uphold the ideals expressed in this Code and urges them to adopt similar policies concerning the provision of goods and services to Papagayo Curacao as a group.

Compliance

Suppliers are expected to follow all relevant international and local laws and regulations, including those related to labor, health and safety, and the environment. Suppliers are expected to inform Papagayo Curacao of any violations, alleged violations or investigations by a governmental authority into potential violations of laws or regulations related to goods or services that the Supplier provides to Papagayo curacao

Human Right & Labor

Papagayo Curacao respects fundamental human rights. Suppliers should recognize and be committed to upholding the human rights of workers, and to treat them with dignity and respect. We expect Suppliers to conform with international standards and guidelines, including the United Nations Universal Declaration of Human Rights.

Our management team will continue to regularly consult with and support our partners to ensure the development and implementation of

- 1. Effective anti-sexual harassment policies,
- 2. Training and education that enables hotel workers to better identify and report sexual harassment, and
- 3. The deployment of employee safety Policies & Procedures.

Freely Chosen Employment

Suppliers shall not use forced or bonded labor. All work will be voluntary, and workers should be free to terminate their employment upon reasonable notice. Workers shall not be required to relinquish control of government-issued identification, passports or work permits as a condition of employment.

Child Labor

Suppliers shall not use child labor for work performed for Papagayo Curacao. If the minimum employment age in a jurisdiction is not defined, the term "child" refers to any person employed under the age of 15 or under the age for completing compulsory education.

Non-Discrimination

Suppliers are expected to follow all applicable international and local laws and accompanying regulations concerning discrimination in hiring and employment practices. Suppliers shall not subject any person to discrimination in employment (including recruiting, hiring, assignment and promotion) on the basis of age, race, color, religion, gender, gender identity, gender expression, marital status, sexual orientation, national origin, disability or any other basis or characteristic protected by law.

No Harassment or Abuse

Suppliers will treat each employee with respect and dignity and will not subject any employee to any physical, sexual, psychological, verbal or other form of harassment or abuse. No activities shall contribute toward human exploitation, including human trafficking and sexual exploitation of children. Given the nature of our business, we are sensitive to the existence of human trafficking. Papagayo curacao has a zero-tolerance policy concerning human trafficking and we are committed to working with our hotel partners to establish steps that help prevent the use of Papagayo Curacao for trafficking and to raise awareness concerning such exploitation.

Minimum Wages

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, rest/break periods and legally mandated benefits, and in respect of workers' rights to earn a living wage.

Working Hours

Work weeks are not to exceed the maximums set by applicable law and should align with internationally recognized standards.

Health & Safety

Suppliers are responsible for ensuring a safe and healthy work environment for their employees. Suppliers are expected to comply with all laws, regulations and rules governing employee occupational health and safety in the jurisdictions where they operate. Suppliers should provide workers with access to clean, safe and reasonable working conditions.

Health and Safety of Hotel, Plaza, Beach club & Resort Guests, Team members and the General Public

Suppliers are expected to take the necessary and appropriate steps to ensure the health and safety of their team members/workers, associates and the general public in the communities where they operate.

Occupational Injury and Illness

Procedures and policies should be in place to manage, track and report occupational injury and illness. Where appropriate, Supplier employees should receive training on safety, proper use of equipment, and use of personal protective equipment.

Ethics

The Papagayo Curacao Code of Business Conduct and Ethics requires that business be conducted with honesty and integrity, and in compliance with all applicable laws. As such, we expect Papagayo Curacao Suppliers and their partners to conduct business in accordance with high ethical standards and fair-trade practice.

Extortion, or Embezzlement

All forms of corruption, extortion and embezzlement are strictly prohibited.

Disclosure and Privacy of Information

Means to effectively safeguard customer information and intellectual property regarding business activities, financial situation, performance and/or any other information deemed confidential are expected to be implemented and such information shall be disclosed only in accordance with the guidelines specified within any agreed upon nondisclosure agreement, privacy policy and as provided for by law.

Anti-Corruption & Bribery

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No Supplier, or its representatives or employees, shall offer, request or receive a kickback or bribe, whether to papagayo curacao employees or to from others relating to work performed for papagayo curacao. Suppliers should observe local customs with respect to gifts, although the value of such offers should never be considered material enough to influence business decisions or contravene applicable regulations.

Community Engagement

Papagayo Curacao is dedicated to the well-being of the community and people of Curacao as evidenced through our various forms of community involvement. Suppliers are encouraged to engage with their communities to help foster social and economic development and sustainability.

Environment

Papagayo Curacao is committed to reducing the impact of its operations and the activities of its Suppliers on the environment. More information on Papagayo Curacao commitment to sustainable business practices can be found in Papagayo curacao Environmental Policy, available on our website at https://www.papagayo.com/sustainability-policy

Product Content Restrictions

Suppliers are expected to adhere to applicable laws and regulations regarding prohibition or restriction of specific substances, including labeling laws and regulations for recycling and disposal.

Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released into the environment should be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

Waste Management

We expect Suppliers to minimize waste and implement policies and procedures to properly dispose of all types of waste, including water, energy, raw materials and processed materials.

Environmental Stewardship

Suppliers should undertake ongoing efforts to reduce the environmental impact of their operations, products and services. Examples of such efforts include reducing energy and water consumption, reducing greenhouse gas emissions, reducing waste and pollution, reducing impact on biodiversity and ecosystems and reducing environmental impact of products during various lifecycle stages as applicable.

Suppliers should develop appropriate environmental management systems, sustainable procurement policies and programs to promote environmental stewardship and improve the lifecycle environmental footprint of products and services.

Record Keeping

Financial records are expected to be kept in accordance with all applicable accounting practices and comply with all relevant legal and regulatory requirements.

Reporting Concern.

Suppliers shall report any violations or suspected violations of applicable laws, regulations and the Code to the papagayo Group. To report a violation confidentially, please kindly send an email to: Ethics@papagayo.com



Papagayo Curacao reserves the right to amend or modify this Supplier Code of Conduct at any time. Papagayo Curacao may end its relationship with any Supplier found to be in violation of these standards, consistent with Papagayo agreement with such Supplier. Papagayo reserves the right to conduct audits of Suppliers to see that practices are in place to conduct business in a manner consistent with this Supplier code of conduct.