



HOTELES
BOGOTÁ PLAZA

CODE OF ETHICS

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1. INTRODUCTION

HOTELES BOGOTÁ PLAZA S.A.S. is a Colombian brand with a history spanning more than four decades of experience in the tourism industry. It has been a pioneer in the sector, having established the Bogotá Plaza Hotel in the northern part of the capital. As part of its expansion as an operator, the company now manages four additional hotels in Bogotá, Cali, and Pereira: Plaza Suites, Hotel Cinco Elementos, Torre de Cali Plaza Hotel, and Casa San Carlos Lodge By HBP.

Over the years, the company has built a strong name and reputation in the tourism and hospitality market, fostering trust through quality, ethics, and innovation.

Committed to a philosophy of service and efficiency, HOTELES BOGOTÁ PLAZA S.A.S. strives to create an environment of ethics and transparency that extends across the entire organization, from shareholders to employees, clients, and suppliers.

In compliance with its regulatory and legal obligations, HOTELES BOGOTÁ PLAZA S.A.S. issues this Code of Ethics, which complements the Internal Work Regulations, contractual obligations, and other policies outlined in the Ethics and Transparency Program (PTEE).

2. OBJECTIVE

The Code of Ethics is developed in accordance with the guidelines set forth in Law 1778 of 2016, Law 2195 of 2022, Chapter XIII of the Superintendence of Companies' Basic Legal Circular, and all applicable regulations regarding data processing. It serves as a roadmap, guide, and reference document for everyone associated with the company. Managers, directors, department heads, and coordinators seek to set an example for all other employees and third parties in the implementation of these organizational guidelines. Their mission is to ensure compliance throughout the organization and among third parties, fostering a culture of transparency and providing clear guidelines on what is considered ethical or unethical within the company. This prevents any actions that could compromise the integrity, reputation, or public image of HOTELES BOGOTÁ PLAZA S.A.

3. SCOPE

This document is intended for all members of the organization, including shareholders, employees, business associates, board members, guests, suppliers, clients, and third parties with whom HOTELES BOGOTÁ PLAZA S.A. has a relationship.

4. DEFINITIONS

- **Business Ethics:** the standards and values that guide behavior and decision-making in the workplace.
- **Transparency:** honest and truthful communication among all parties associated with the company, as well as integrity, accuracy, and openness of information.

- **Integrity:** adherence to moral and ethical principles, acting with honesty, transparency, and responsibility in daily company activities.

5. STRATEGIC VISION AND GENERAL PRINCIPLES

Mission

Hoteles Bogotá Plaza S.A.S. (HBP) is a growing brand that operates hotels and similar establishments nationwide. It provides management support to organizations entrusted by property owners and investors, leveraging its experience and tradition. HBP has a trained and dedicated team committed to customer satisfaction through quality, innovation, and operational efficiency.

The following fundamental principles guide the fulfillment of the organization's mission:

- **Ethics and Trust:** we are transparent and loyal in all our relationships. Our experience and tradition set the foundation for the expansion of our brand.
- **Effectiveness:** we make decisions focused on achieving objectives and efficiently utilize resources to ensure the best returns for our stakeholders.
- **Quality and Innovation:** we meet requirements and exceed our customers' expectations, continuously improving our processes.

6. INTERRELATION BETWEEN PRINCIPLES AND VALUES

Trust and Honesty: we share knowledge in an honest and reliable manner, believing that honesty is essential for teamwork. It strengthens authentic leaders and motivates everyone to work towards a common, transparent goal while fostering respectful and open communication.

Honesty with Clients and Organizational Ethics: we prioritize honest and respectful communication with our clients as a core part of our organizational culture. Our experience and tradition support the quality of our work.

Integrity and Regulatory Compliance: we place the utmost importance on respecting laws, regulations, and applicable policies in every aspect of the company's operations.

Effectiveness and Discipline: we dedicate our efforts to the right causes and activities, prioritizing what brings the most value to the organization. Every task we undertake is aligned with the global objectives of HOTELES BOGOTÁ PLAZA S.A.

Quality and Service: we are committed to delivering exceptional service, supported by quality standards, ensuring a memorable experience for every guest. Through dedication and attention to detail, we strive to earn the trust of both our employees and customers, ensuring that every aspect of their stay reflects our passion for hospitality, comfort, and exclusivity.

Trust and Responsibility in Information Assets: we manage, protect, and safeguard the organization's information responsibly, preventing its loss, misuse, or unauthorized disclosure while ensuring its proper development and preservation.

Effectiveness and Responsibility in Resource Management: we efficiently manage resources, fulfill financial commitments, and always prioritize the organization's best interests to ensure long-term profitability and sustainability.

Trust and Confidentiality: we safeguard all information accessed in the course of our duties, ensuring that it is not used for commercial purposes or personal gain. We maintain discretion and care at all times.

7. CODE OF ETHICS GUIDELINES

HOTELES BOGOTÁ PLAZA S.A.S. does not tolerate the following conduct:

- Any form of discrimination or harassment in the workplace, including sexual harassment by any means.
- Jokes, slander, or other comments related to race, religion, ethnicity, or of a sexual nature.
- Verbal remarks or physical behavior that interfere with work performance and/or the integrity of others.
- The misuse of one's position by any staff member for personal or third-party gain and/or to the detriment of the company.
- The promotion of an intimidating, hostile, or offensive work environment, including the use of inappropriate language.
- Sharing confidential company information with unauthorized third parties, including service pricing, credit conditions, special terms, benefits, and any other private business-related matters.
- Engaging in or accepting any form of extortion or bribery.
- Zero-Tolerance Policy – Prevention of the Commercial Sexual Exploitation of Children and Adolescents (ESCNNA):

Hoteles Bogotá Plaza is committed to the fight against exploitation, pornography, and sex tourism involving children and adolescents. We strictly adhere to the provisions of Law 679 of 2001 and Law 1336 of 2009.

Guests, visitors, and any other individuals are hereby warned that the commercial sexual exploitation of children and adolescents in the context of travel and tourism (ESCNNA) in Colombia is a criminal offense under the Penal Code. The Colombian government condemns sexual activities, erotic acts, or pornography involving minors under the age of 18, offenses that are punishable by up to thirty-three (33) years in prison.

Colombian Penal Code, Law 599 of 2000, Article 219, states that "anyone who directs, organizes, or promotes tourism activities that involve the sexual exploitation of minors shall be subject to imprisonment for four (4) to eight (8) years." In compliance with Colombian law and to ensure the proper registration of minors, children must be accompanied by their parents and/or legal guardians at check-in, presenting their civil registry or identification document, depending on their place of birth. If they are accompanied by an adult other than their parents and/or legal guardian, a notarized or consular-certified authorization must be provided according to their country of origin, along with a copy of the parents' and/or legal guardian's identification documents.

- The installation of unauthorized, malicious, or illegal software on company devices is strictly prohibited. Accessing inappropriate digital content that contradicts company policies is also forbidden. Corrupt or fraudulent practices are strictly prohibited, including document falsification, embezzlement, false statements, or any act intended to deceive or defraud the organization, clients, suppliers, or the government.
- The use of company resources, infrastructure, technological equipment, or information for personal, political, or commercial purposes, or for any activity unrelated to organizational objectives, is not allowed.
- Any involvement in money laundering, terrorism financing, or the reception of funds from illicit sources is strictly prohibited, in full compliance with SAGRILAFI regulations.
- The misuse or unauthorized disclosure of personal or sensitive information about clients, employees, or third parties is strictly forbidden, in accordance with Law 1581 of 2012 and other applicable data protection regulations.
- The alteration, falsification, or manipulation of accounting, financial, or corporate reports is absolutely prohibited.

8. CONSIDERATIONS

- All personnel are required to be familiar with and comply with this Code, as well as the legal provisions applicable to their duties, in accordance with the Internal Work Regulations. This information is provided from the moment they join the organization.
- This code will be communicated to all employees and members of management through onboarding, training sessions, internal communications, and other communication channels.
- Management reviews this Code periodically and approves any amendments deemed necessary in response to the organization's needs.
- This Code is supplemented by the organization's other established policies.
- Management of Nonconformities and Operational Responsibility: the Hotel promotes a culture of quality, accountability, and continuous improvement. Accordingly, all employees are expected to diligently comply with internal procedures, promptly report any identified deviations or errors, and cooperate with the corrective and preventive actions established. Operational deviations and/or nonconformities are subject to internal review and may result in training, process improvements, operational monitoring, or disciplinary measures where warranted, in accordance with applicable regulations and the Hotel's internal policies. Under no circumstances does the occurrence of a deviation or nonconformity, in and of itself, automatically create any financial liability for the employee.

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graph LR; A[Department staff report and/or the Department Head identifies an incident or nonconformity in the delivery of a product or service (during or upon completion of a process).] --> B[The Department Head reviews the case with the personnel involved and determines whether to consult Security (CCTV) and/or Human Resources, as appropriate.]; B --> C[The relevant Department Head, with the support of Human Resources and any other appropriate support departments, conducts an analysis of the case, traces the sequence of events, and verifies the specific circumstances that gave rise to the incident.]; C --> D[When the analysis reveals a potential breach of employment, contractual, regulatory, or ethical obligations, the Hotel may initiate the appropriate internal proceedings while ensuring due process.];
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- Failure to comply with these rules may result in disciplinary action, including sanctions, termination for cause, or legal proceedings, as applicable.



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