

Anti-Corruption and Related Infractions Policy

1. Commitment to Integrity and Transparency

Grupo Cardoso takes on the commitment to conducting all its activities with the highest standards of ethics, integrity, and transparency.

We do not tolerate any form of bribery or corruption, whether direct or indirect, active or passive, by our employees, service providers, suppliers, partners, or any third parties acting on our behalf.

2. Purpose of the Policy

*This Policy aims to establish the guidelines and principles that guide the prevention, detection, and combat of bribery and corruption within the scope of our hotel activity, in alignment with the requirements of ISO 37001:2016 – **Anti-bribery Management Systems**.*

3. Scope of Application

This Policy applies to all employees of the hotel unit, including the management and executive board, as well as to service providers, suppliers, business partners, and any other parties acting on behalf of or in the interest of Grupo Cardoso.

4. Important Definitions

- **Bribery:** *Offering, promising, grant, requesting, or accepting of an undue advantage (whether financial or otherwise) with the intent to influence the actions or decisions of a person in the performance of their duties.*
- **Corruption:** *The abuse of entrusted power for personal gain or to obtain an undue advantage.*

5. Principles and Expected Conduct

- *It is strictly prohibited to offer, promise, authorize, accept, or request any form of bribery, whether directly or indirectly, in dealings with clients, service providers, suppliers, or public or private entities.*
- *Business and operational decisions must be based solely on technical, legal, and ethical criteria.*
- *The offering of gifts, hospitality, meals, travel, or any other advantages is only permitted when reasonable, proportionate, made in good faith, and in compliance with the organization's internal policies.*
- *Facilitation payments (payments made to expedite administrative procedures) are not allowed.*
- *Political contributions, sponsorships, or donations must be previously approved by Management and properly recorded.*

6. Duty to Communicate and Whistleblowing Channel

All employees and stakeholders have a duty to communicate, in good faith, any suspicions of bribery, corruption, or other irregular conduct using the channels provided for this purpose. Reports may be made anonymously, and the organization ensures full confidentiality and protection against any form of retaliation.

7. Training and Awareness

Grupo Cardoso is committed to promoting periodic training and awareness initiatives to ensure that everyone understands their duties under this Policy and the risks associated with corruption in the hospitality sector.

8. Consequences of Policy Violations

Failure to comply with this Policy may result in disciplinary measures, including dismissal for just cause, termination of contracts with third parties, and, where applicable, reporting to the competent authorities.

9. Management Commitment and Continuous Improvement

The Management of Grupo Cardoso is committed to the effective implementation of the Anti-Corruption and Related Offenses Management System, promoting the continuous improvement of its processes, compliance with applicable legislation, and the adoption of best practices in combating corruption.

Grupo Cardoso may amend this document at any time to reflect current privacy practices.