

ROOMOO

NEXT GEN HOSPITALITY

room
URBAN HOSTELS

TOC
CLASSY HOSTELS

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NATURAL HOTELS

LETOH
LIFESTYLE HOTELS

ETHICS AND COMPLIANCE

1. CODE OF ETHICS

2. ANTI-CORRUPTION POLICY

3. WHISTLEBLOWING CHANNEL

1. CODE OF ETHICS OF ROOM00 HOSTELS & HOTELS, S.L.

The Code of Ethics of ROOM00 HOSTELS & HOTELS, S.L., approved by the Company's Board of Directors, constitutes the highest-level standard within the company's compliance system. It reflects ROOM00's commitment to a culture of integrity, transparency, and respect for the law, serving as a guide for all individuals within the organization and for its relationships with customers, suppliers, partners, and third parties.

PURPOSE AND SCOPE

The Code of Ethics establishes the principles and standards of conduct governing the behavior of all employees, executives, and members of the Board of Directors, as well as any individual or entity acting on behalf of ROOM00. Its purpose is to ensure that all actions are carried out ethically, responsibly, and in compliance with the law, preventing conduct that could compromise the company's reputation or create criminal, labor, or administrative risks.

GUIDING PRINCIPLES

The Code of Ethics is based on the values of regulatory compliance, integrity, respect for the law, transparency, objectivity, respect for human rights, social responsibility, and environmental sustainability. These principles guide all decisions and actions of the company, promoting a culture founded on professional ethics, equal opportunities, non-discrimination, and the prevention of any form of harassment or degrading treatment.

COMMITMENTS OF ROOM00 AND ITS EMPLOYEES

ROOM00 maintains a firm commitment to combating corruption, extortion, and bribery, in accordance with its Anti-Corruption Policy. Any practice involving influence peddling or undue advantage is strictly prohibited. Mechanisms are also established to prevent and manage conflicts of interest, the manipulation of confidential information, and the improper use of corporate resources.

The company promotes equality, respect, and workplace safety through active policies on risk prevention, the fight against sexual harassment or harassment based on gender, and the protection of a healthy and diverse working environment. All employees are required to report, in good faith, any breach or suspicion through the Whistleblowing Channel, with confidentiality and protection against retaliation guaranteed.

RELATIONSHIP WITH THIRD PARTIES AND SOCIAL COMMITMENT

ROOM00 requires its suppliers, partners, and collaborators to comply with the same ethical and legal standards applied internally. Relationships with customers are based on trust, transparency, and service quality. Purchasing and contracting decisions must be based on objective criteria, with documented and auditable processes, and always approved in accordance with internal procedures and by the company's competent governing bodies following the appropriate reputational review.

The company maintains a zero-tolerance policy toward any form of corruption or preferential treatment involving public officials or political parties, expressly prohibiting donations or sponsorships intended to exert influence. Only transparent, documented contributions and sponsorships aligned with the company's corporate values and social or cultural objectives shall be permitted.

SUSTAINABILITY AND FAIR COMPETITION

ROOM00 integrates sustainability and environmental responsibility into its business strategy. It promotes the responsible use of natural resources, proper waste management, and the engagement of suppliers committed to sustainable practices. In terms of competition, the company promotes fair conduct, rejecting agreements, practices, or exchanges of information that restrict free competition or create unfair advantages.

INTERNAL CONTROL AND GOVERNANCE

The Compliance Committee is the body responsible for implementing, updating, and supervising the Code of Ethics. It has sufficient autonomy and resources to ensure compliance, conduct investigations in cases of infringement, and protect whistleblowers. ROOM00 also has an Internal Information System, managed securely and confidentially, accessible through the following link: <https://room00.integrityline.com/>

CORPORATE GOVERNANCE AND RESPONSIBILITY

Compliance with the Code of Ethics is mandatory for all individuals forming part of ROOM00. Failure to comply may result in disciplinary sanctions, including suspension or termination of employment, as well as possible civil or criminal liability. The Code of Ethics reinforces ROOM00's commitment to a corporate culture based on ethics, transparency, responsibility, and respect – essential elements for maintaining the trust of its stakeholders and the sustainability of its business model.

2. ANTI-CORRUPTION POLICY

The Anti-Corruption Policy of ROOM00 HOSTELS & HOTELS, S.L., approved by its Board of Directors on January 31, 2025, reflects the company's firm commitment to integrity, transparency, and regulatory compliance in all its operations. This policy constitutes a key pillar of ROOM00's corporate compliance system and applies to all employees, executives, members of the Board of Directors, and third parties acting on its behalf.

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PURPOSE AND SCOPE

ROOM00 adopts a zero-tolerance approach toward any form of corruption, bribery, influence peddling, or unlawful conduct, in line with the Spanish Criminal Code and international treaties on the matter. This policy aims to prevent, detect, and sanction any practice that could compromise the company's integrity or reputation, ensuring that all business decisions are made based on objectivity, ethics, and responsibility.

GENERAL PRINCIPLES

The policy establishes the following core principles:

ABSOLUTE REJECTION

Absolute rejection of any form of corruption or attempted bribery.

PROHIBITION OF PAYMENTS

Prohibition of facilitation payments and any undue advantage.

BUSINESS RELATIONSHIPS

Prohibition of facilitation payments and any undue advantage in business relationships.

COMMITMENT TO TRANSPARENCY

FULL TRANSPARENCY

Commitment to transparency regarding gifts, travel, hospitality, and donations.

OBLIGATION TO REPORT

Obligation to report any potential breach through the Whistleblowing Channel.

CONTINUOUS TRAINING

Ongoing training on corruption prevention and anti-corruption measures.

3. WHISTLEBLOWING CHANNEL

Room00 Group has a digital whistleblowing channel accessible through the following link:

<https://room00.integrityline.com/>

This system allows written or verbal reports to be submitted, including anonymously, while guaranteeing confidentiality and the protection of whistleblowers in accordance with Law 2/2023 of February 20, regulating the protection of individuals who report regulatory breaches and combat corruption.



DIGITAL ACCESS

Online channel available 24/7.



CONFIDENTIALITY

Full protection of the report and guaranteed anonymity.



LEGAL PROTECTION

Compliance with Law 2/2023 on whistleblower protection.