



Hapimag Code of Conduct



Introduction

This document serves as an introduction to who we are as Hapimag and as a guidance tool to help you understand your rights and duties within the ethical, social, legal and compliance context of the company. We expect everyone who works at Hapimag to know and follow the Code of Conduct. Furthermore, we expect that you commit and prioritize the **Hapimag Values** throughout all your professional decisions and actions as they are at the core of our corporate culture and the backbone of our ever growing success.

Who We Are: Living our Vision, Mission & Values

Hapimag is a holiday provider that was founded in 1963 based on a strong sense of community and a deep-rooted belief in the importance of sharing and caring; our sustainable business model allows our shareholders to “Invest together in holiday apartments, but use individually”, giving our community of around 120,000 members the flexibility to enjoy 56 resorts across 15 countries. As we move forward, our collectively aim – with the engagement of our customers – at optimizing our business model based on the triple bottom line (economic, social and environmental) in order to offer our guests the best holiday experience possible. Our efforts to build and grow this sustainable holiday sharing community is based on each and every Hapimag employee. That is why we ensure we maintain a very open and flexible work environment that supports ideas and eliminates communication barriers across all levels and borders. It is for that reason we foster an environment of honesty, openness, guidance and growth. As we are fully aware and committed to acknowledging all the individual efforts that go into our collective success of living by our mission to achieve our vision ...

Our vision

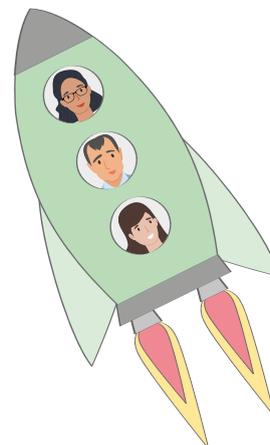
More Happy People for a Better World.

Our Mission

We create an authentic holiday experience that exceeds the expectations of our guests and makes them happy, as happy people make our world a better place.

Our Strategy

We will only achieve our strategic goals if we are all actively involved and we live our vision, mission and strategy together. Therefore it is all the more important that each and every one of us realises his or her personal potential. All our employees together give our company the necessary “push” to achieve our goals with full “power”.



Our Values



Familiar

Our Hapimag Community is formed by shareholders, guests, suppliers and colleagues together. We cultivate a familiar atmosphere that is warm, open and relaxed. Trustful relationships are just as important to us as friendly interaction.



Passionate

Making people happy on their holiday is our greatest passion. For us, this includes joy, commitment, helpfulness and going the extra mile for our guests. We are there for them and take their concerns seriously. We put promises into practice and keep our word.



Responsible

Since 1963, our sustainable business model has been based on the idea of "Sharing is caring". On these pillars we live social, ecological and economic sustainability, every day. We act with respect for each other, our resources and the environment.



Genuine

We are locally anchored and cultivate relationships with the people in our regions. The individual character of a region is reflected in our resorts. We share the enthusiasm for our destinations, with all their beauty and peculiarities. This is how we offer exceptional and authentic holiday experiences.

Hapimag as a Safe Space

We are continuously working towards making Hapimag a safe space for all our current and future employees and guests. We do not tolerate discrimination or harassment in any of its forms, be it based on one's age, beliefs, sexual orientation, gender identity, disability, race, ethnicity or any other factors. We expect nothing less than high mutual respect from everyone including our members, guests, suppliers and any other stakeholders.

All complaints, concerns, appeals or suspected cases of verbal, sexual, physical or digital harassment, of discrimination or of bullying can be reported anonymously via this link:

<https://hapimag.integrityline.com>

All complaints and reports are processed and resolved with the utmost care and responsibility.



Hapimag as a Fair Employer

As Hapimag, we are committed to upholding fair and equal pay for equal work and to eliminating inequalities and biases against women, nonbinary individuals and members of minority groups. Furthermore, we hold a careful hiring process that ensures equal opportunities for all.

Corporate Social Responsibility

As stated before, we believe the only valid success for Hapimag is a sustainable one; it is for this reason we have a dedicated companywide Corporate Social Responsibility (CSR) strategy that tackles economic, social and environmental sustainability. As a Hapimag employee, you are expected to share our values of responsibility and sustainability at work. We expect everyone at Hapimag to be always aiming towards more sustainable workplace habits and to be "sustainability advocates" among your colleagues through your day-to-day actions and within the scope of your job's decisions and responsibilities.

Communication

All communication conducted through Hapimag (work email, shared google drive, Hapimag's social media accounts, etc.) must maintain a high level of professionalism and accuracy as it is representative of the company and because, all communications are potentially subject to disclosure in certain cases such as litigation, or governmental investigation. Official statements and declarations on behalf of Hapimag are to be made **exclusively** by official Hapimag spokespeople including the Members of the Board of Directors, the Executive Committee and the Communications Department.

Should you be approached for an official statement, please refer to the communications department via this email:

communication@hapimag.com

Confidentiality

Hapimag employees are required to use confidential information of Hapimag for business purposes only and must always keep such information in strict confidence, even after the end of the employment contract with Hapimag. This responsibility extends to confidential information of third parties acquired under non-disclosure agreements.

If you have questions about the provisions of a non-disclosure agreement already in place, or if you have questions about whether certain information can be disclosed, please contact the Legal Office: legalservices@hapimag.com

Hapimag employees handling confidential information hold the responsibility of who they share it with, with the clear understanding and upheld standard that sharing confidential information is to be kept to an absolute minimum.

Conflict of Interest:

Expectations & Suggested Action

A conflict of interest happens when your personal interests interfere with the best interests of Hapimag. It is each employee's duty to identify and avoid such conflict whenever possible. Conflicts of interest need to be disclosed to your superior before a decision is taken and the employee concerned needs to be excluded from the decision making process where they or a family member of theirs or a friend of theirs has a personal stake in. If you have doubts whether a certain situation or issue creates a conflict of interest, refer to your direct manager or HR for guidance.

Whistleblowing & Reporting Violations

If employees, suppliers, members and third parties learn about or suspect a violation of this Code, another Hapimag policy, or any law, they shall promptly report it via this link <https://hapimag.integrityline.com>

In cases in which an individual reports a suspected violation of policy or law in good faith, Hapimag will attempt to keep the individual's anonymity and its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws.

Hapimag will not retaliate against anyone making a good faith report of a potential violation, and it will investigate any report of a violation.

The disciplinary measures for a violation of Hapimag policies or applicable law may range from a verbal feedback or warning up to and including termination of employment. And, in accordance with applicable law, to legal prosecution.



IT & Data Protection

Data privacy is of the utmost importance to Hapimag and we handle it with the strictest responsibility in order to protect people's rights to their privacy – be it our employees, our members, suppliers or any other stakeholder.

If you have any questions or concerns regarding the topic please contact the Data Protection Officer: dpo-ch@hapimag.com

Legal Compliance

Hapimag's employees are expected to act within the bounds of applicable laws, rules and regulations of the countries where we do business. The application of these and other laws can be complex and fact-dependent. If you have any questions about the applicability of interpretation of any law, rule or regulation, please contact the Legal Office or the respective Area Controller in your country.

Integrity

We have a zero tolerance approach regarding corrupt acts including but not limited to accepting bribes in the form of Gifts, Hospitality or Entertainment (GHE); no Hapimag employee is permitted to accept or engage in the exchange of gifts (e.g. Money, vouchers, gifts, etc.) at a value higher than 50 EUR. As for Hospitality (Lunches, private transportation, etc.) and Entertainment (e.g. concerts, sporting tickets, exclusive events, etc.), it is strictly prohibited to accept it or offer it in exchange for improper favors, benefits or influence. When in doubt, please refer to your direct manager.

