

SUPPLIER CODE
OF CONDUCT

ELITE HOTELS
OF SWEDEN



INTRODUCTION

Elite Hotels of Sweden (“Elite”) consists of over 40 premium hotels. Each hotel has a unique history, and the majority is housed in carefully restored buildings where our ambition has been to unite classical style with modern trends in order to achieve harmony. An important part of Elite Hotels of Sweden is the gastropub chain The Bishops Arms which offers the widest range of whisky and beers, on the market, as well as serving high quality food.

We are committed to conducting our business activities in full compliance with applicable laws, rules and regulations and strive at continuously improving our social and environmental performance throughout our entire value chain.

We take responsibility for our actions and we expect our suppliers to do the same.

This Code of Conduct for Suppliers defines our basic requirements in the area of human rights and working conditions, the environment and business integrity. Elite expects its suppliers to implement the principles described in this Code of Conduct for Suppliers in their own businesses or have at least equivalent standards adopted and conduct their business in accordance therewith.

Elite will continuously monitor suppliers’ compliance with the standards set out in this Code of Conduct for Suppliers by asking suppliers to provide relevant information and also by conducting supplier audits and reviews.



HUMAN RIGHTS AND WORKING CONDITIONS

Elite expects its suppliers to support and protect human rights both in the workplace and more broadly in all their business activities. All employees and workers are to be treated fairly, with dignity and respect.

Freedom of Association and Collective Bargaining
Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively. In situations where the right to freedom of association and collective bargaining are restricted under law, suppliers shall allow workers to freely elect their own representatives.

FORCED LABOR

Suppliers shall prohibit any use of forced, bonded, indentured labor or involuntary prison labor. All work, including overtime work, shall be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Suppliers shall not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

CHILD LABOR AND YOUNG WORKERS

Suppliers shall work against all forms of child labor. Suppliers must not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Suppliers must not employ any young workers under the age of 18 to perform any work that is likely to be hazardous or harmful to their health and safety.

NON-DISCRIMINATION

Suppliers shall not practice any form of discrimination in hiring and employment practices including access to training, promotions and rewards on the grounds of of gender, gender identity or expression, sexual orientation, age, ethnic origin, religion, political opinion, physical ability, state of health, union membership or marital status.

HEALTH AND SAFETY

Suppliers shall ensure a safe and healthy workplace or any other location where production or work is undertaken. Appropriate health and safety information, training and equipment shall be provided to all workers.

WAGES AND BENEFITS

Suppliers must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. All employment conditions, including compensations, working hours, vacation time, leave periods and holidays must be consistent with applicable laws and regulations, especially mandatory industry standards.

ENVIRONMENT

Elite expects its suppliers to manage their operations responsibly in relation to environmental risks and impacts and to adopt a precautionary approach in their business operations. Resources such as water and energy shall be used efficiently.

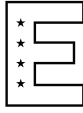
All our hotels are committed and awarded with the leading international Environment standard "Green Key". This places great demands on our work for a sustainable future. We recommend all our suppliers to take part in Green Key's content.

ENVIRONMENTAL LEGISLATION

Suppliers must obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

WASTE MANAGEMENT AND POLLUTION PREVENTION

Suppliers shall endeavor to avoid or reduce any waste or emissions as a result of their business activities. Suppliers shall use efficient technologies which aim to reduce the environmental impact as much as possible.



ENVIRONMENTAL MANAGEMENT SYSTEMS

Elite's suppliers whose activities have an environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems for environmental protection, setting targets and performing follow-ups.

BUSINESS INTEGRITY

Elite expects its suppliers to conduct business in compliance with legal requirements and to adhere to internationally agreed standards of business ethics. Zero tolerance towards corruption, bribery, money laundering or unauthorized restriction of competition.

LEGAL COMPLIANCE

Suppliers must comply with all applicable laws, rules and regulations in the countries where they carry out their business activities.

ANTI-CORRUPTION

Elite's suppliers must not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers must not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

CONFLICT OF INTERESTS

Suppliers shall avoid conflicts of interest that may compromise the supplier's credibility in the Elite group or other exterior parties' confidence in the Elite group.

Protection of Third Party Rights and Information
Suppliers must respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud or improper disclosure.

COMMITMENT

Elite expects its suppliers to show their commitment to the principles defined herein by establishing suitable monitoring systems and by following-up in case they receive knowledge about any violations.

MONITORING SYSTEM

Suppliers shall have adequate systems and controls in place to ensure compliance with these standards or equivalent standards. Suppliers' systems and controls shall also apply to the sub-contractors and suppliers they work with which are directly or indirectly connected with providing goods and services to Elite.

CONSEQUENCES IN CASE OF VIOLATIONS

Suppliers shall address any violations of these standards or equivalent standards that come to their knowledge and take appropriate actions. Depending on the severity of the violation appropriate actions could be a request for corrective measures but also the termination of the cooperation with any employee, sub-supplier or contractor who mandated, facilitated or applied unacceptable methods.

WHISTLEBLOWER

Elite Hotels has a solid whistleblower system, handling notifications from employees, guests, suppliers and the public – notifications that are not captured in the normal routines. The notifications may consist of internal suspected violations of the framework, suspicions of irregularities, corruption, harassment and suspected crimes. The whistleblower system then channels the notifications to the right decision-makers in the organization for further investigation.