

ANTI-BRIBERY & CORRUPTION POLICY

Introduction

Dalata Hotel Group plc is committed to conducting business with all our suppliers, customers and partners in a way that is fair, transparent and benefits all parties involved. We operate in Ireland and the UK, both of which have passed legislation in relation to bribery and corruption, namely:

- Republic of Ireland: Criminal Justice (Corruption Offences) Act 2018
- United Kingdom: Bribery Act 2010

The purpose of this document is to set out the Group's policy in relation to bribery and corruption and to provide summary guidance to employees and management on related areas.

This policy applies to all officers and employees of Dalata Hotel Group plc and its subsidiaries and is also applicable to any agents/advisors the Group may use in its business activities

Group Policy

The Group does not condone any activity that could constitute bribery or corruption. Accordingly, any payment and/or offer of goods or services that could be construed as a bribe or corrupt payment is strictly prohibited.

This policy prohibits:

- offering, promising, or giving a bribe;
- requesting, agreeing to receive, or accepting a bribe;
- whether in cash, or by way of other inducement;
- to or from any person or company, wherever they are situated and whether they are a public official/ public foreign official or body, or private person or company;
- by any individual employee, agent or other person or body acting on Dalata Hotel Group behalf;
- in order to gain any commercial, contractual or regulatory advantage for Dalata Hotel Group in a way which is unethical;
- or in order to gain any personal advantage.

The key matter to be considered by all employees/agents is whether any payment, or request for payment/ services/products, could be construed or perceived as being a bribe or a corrupt payment. It is the responsibility of all employees and management to be aware of the specific circumstances of all such requests and to make a considered judgement in this regard. Employees should seek the guidance of Central Office executive management should any queries arise.

Any employee should raise a concern through the appropriate channels if they believe that this policy is not being followed.

Failure to comply with this policy may, depending on the circumstances, result in disciplinary action, up to and including dismissal, and/or prosecution.

The CEO has overall responsibility at a Group level for this policy. Executive management and hotel General Managers are responsible for implementing this policy in their specific business areas.

What is Bribery and Corruption?

Bribery

The offering, promising, giving, accepting or soliciting of an advantage or inducement in order to gain a commercial, contractual, regulatory or personal advantage.

A bribe does not need to be a monetary sum; it can take the form of a gift, consideration or advantage offered or requested. Examples include an award of a contract, a discount in a commercial transaction or an offer of employment.

Corruption

Corruption is the abuse of power for private gain. For the purposes of the Criminal Justice (Corruption Offences) Act 2010, acting "*corruptly*" includes acting with an improper purpose personally or by influencing another person, whether - (a) by means of making a false or misleading statement, (b) by means of withholding, concealing, altering or destroying a document or other information, or (c) by other means;

Other Related Policy Areas

a. Facilitation Payments

A facilitation payment is a financial payment that is made with the intention of expediting an administrative process. It is usually a payment made to a public or government official that acts as an incentive for the official to complete some action or process expeditiously, to the benefit of the party making the payment.

Facilitation payments do not cover "fast track" or other payments that are publicly available with pre-defined and published rates.

The Group does not permit facilitation payments.

b. Political Donations

It is Group policy to not make political donations. However, this does not preclude the Group or individual hotels from conducting business with political parties/affiliates for events/stays in the normal course of business.

c. Charitable Donations & Sponsorships

The Group will make charitable donations and enter into sponsorship agreements as part of its normal business activities. However, it is important to ensure that any charitable donations or sponsorships are not used as a pretence for bribery.

All material or Group-wide charitable donations and sponsorships must have the approval of Central Office executive management.

Local hotels are permitted to enter into local sponsorships (e.g. for local sports organisations) and to make local charitable donations to local organisations. All such transactions must be reasonable and of a modest value. The hotel General Manager and Hotel Accountant must approve all such payments.

d. Gifts & Hospitality

The Group operates in the hospitality business and offering hospitality to our guests and patrons is part of our day-to-day customer service. Furthermore, Dalata places a high value on the development of strong relationships with suppliers and customers alike, both at corporate and personal levels. However, it is important to distinguish between gifts/hospitality offered in the normal course of business and those that could be perceived as gaining an influence.

Gifts and hospitality must only be offered or accepted where they are infrequent, reasonable and modest and where there is no risk that they will improperly influence, or be seen to improperly influence, a business decision.

In particular, there must be no express, implied or perceived link between any gift or hospitality and the terms on which we do business.

Hospitality includes invitations to social functions, sporting events, meals and entertainment. Providing or accepting hospitality is only allowed where its purpose is to develop legitimate business relationships. It must be proportionate having regard to the recipient and the organisation concerned.

Gifts/hospitality must be modest in value. No gift should be given if it could be misconstrued as a reward, an inducement or other corrupt act. Cash or cash equivalents must never be given or accepted.

It is the responsibility of each employee to ensure that any gifts and/or hospitality, both offered or accepted, complies with this policy.

Where there is any potential doubt as to compliance, the employee must seek the input and approval of the hotel General Manager and/or Central Office executive management, as appropriate.

This policy will be reviewed on, at least, an annual basis.