



INTERNAL WHISTLEBLOWING CHANNEL

(Lucillumar - Sociedade Hoteleira e Turismo, S.A.)

DOCUMENT CONTROL	
Institution Name:	Lucillumar – Sociedade Hoteleira e Turismo, S.A.
Document Title:	Internal Whistleblowing Channel
Implementation date:	19/06/2024
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Prepared by [Name, Title]:	The company's lawyers, advnc; Administration Secretary, Carolina França
Reviewed by [Name, Title]:	Advnc, Nuno Ferro
Approved by [Name, Title], [Date, Signature]:	Administrator, Frank Siebrecht 05/06/2026

REVISION CONTROL		
Version	Description (Summary of changes made - Indicate page / section)	Date
V1	Implementation of the Internal Whistleblowing Channel, involving the heads of the following departments (Human Resources, Finance, Operations, Sales and Marketing, and Administration) and following consultation with the company's legal advisers	19/06/2024
V2	Document review (no changes)	28/05/2025
V3	Document review: Change to the person responsible for receiving and following up on complaints Update to contact email address – Page 2	05/06/2026



In accordance with and for the purposes of the Law no. 93/2021 of 20 December, we hereby inform you that an internal whistleblowing channel has been set up, through which infringements of national and/or EU legislation, whether committed or in progress, as well as attempts to conceal them, may be reported, particularly regarding the following matters:

- i) Public procurement;
- ii) Financial services, products and markets and the prevention of money laundering and terrorist financing;
- iii) Product safety and compliance;
- iv) Transport safety;
- v) Protection of environment;
- vi) Radiation protection and nuclear safety;
- vii) Food and feed safety, animal health and animal welfare;
- viii) Public health;
- ix) Consumer defence;
- x) Protection of privacy and personal data and security of the network and information systems;
- xi) Corruption and related offences
- xii) Violation of the Code of Conduct.

Lucillumar - Sociedade Hoteleira e Turismo, S.A., aims to be a reliable business partner at all times. Sustainable thinking and action and strong cohesion characterize our corporate culture. It is crucial for the success of our company that all players share the same values and align their actions with these values in the same way. In line with our core values, we would therefore like to encourage you to report any indications of violations of the law, the REWE Group Code of Conduct or other significant breaches of rules.

Concerns may be reported at any time, anonymously or with the whistleblower's identity identified, by e-mail to denuncias.galoresort@sentido.com or by post to the following address "Nuno Correia Ferro. Hotel Sentido Galosol. Rua D. Francisco Santana. 9125 - 031 Caniço. Santa Cruz". Alternatively, a face-to-face meeting may be arranged, subject to prior appointment, for an oral statement, should the complainant so wish. The person responsible for receiving and following up on complaints is Nuno Correia Ferro, the company's lawyer.

Alternatively, please use the REWE Group Hintbox on the following [link](https://rewe-group.hintbox.de/) <https://rewe-group.hintbox.de/>

This internal whistleblowing channel guarantees the completeness, integrity and preservation of the report, the confidentiality of the identity or anonymity of the whistleblower, as the case may be (the identity of the whistleblower only being disclosed as a result of a legal obligation or court decision) and the confidentiality of the identity of third parties mentioned in the report, as well as preventing access by unauthorised persons.

Canico, 5th of July of 2026,

The Legal Representative of Lucillumar - Sociedade Hoteleira e Turismo, S.A.

Frank Siebrecht (Administrator)



WHISTLEBLOWING POLICY AND PROHIBITION OF RETALIATION

(Lucillumar - Sociedade Hoteleira e Turismo, S.A.)

DOCUMENT CONTROL	
Institution Name:	Lucillumar – Sociedade Hoteleira e Turismo, S.A.
Document Title:	Whistleblowing Policy and Prohibition of Retaliation
Implementation date:	13/06/2024
Last Update:	05/06/2026
Prepared by [Name, Title]:	Company's Layer, advnc; Administration Secretary, Carolina França
Reviewed by [Name, Title]:	Company's Layer Advnc, Nuno Ferro
Approved by [Name, Title], [Date, Signature]:	Administrator, Frank Siebrecht 05/06/2026

REVISION CONTROL		
Version	Description (Summary of changes made - Indicate page / section)	Date
V1	Implementation of the Whistleblowing Policy and Prohibition of Retaliation, involving the heads of the following departments (Human Resources, Finance, Operations, Sales and Marketing, and Administration) and following consultation with the company's legal advisers	13/06/2024
V2	Review of the document (no changes)	28/05/2025
V3	Revision of the document: Change the person responsible for receiving and following up on whistleblowing reports Update the contact email address – Page 3 Update on page 8: “ <u>The person responsible for managing the whistleblowing channel</u> shall assess any breaches that may have been committed by members of the Board of Directors”	05/06/2026



Lucullumar - Sociedade Hoteleira e Turismo, S.A., hereinafter referred to as "**Lucullumar**", comprising the Sentido Galo Resort and Alpino Atlantico Ayurveda Hotels, is committed to conducting its business with integrity and in a respectful, honest and ethical manner.

Under the terms and for the purposes of **Law no. 93/2021 of 20 December**, Lucullumar has created an internal whistleblowing channel, as well as this Whistleblowing and Prohibition of Retaliation Policy.

The purpose of this policy is to present **Lucullumar's** Whistleblowing Channel, establishing its rules of use and outlining the process for receiving and dealing with whistleblowing received, as well as defining the various parties involved in this process.

SCOPE OF APPLICATION

Lucullumar's Whistleblowing Policy and Prohibition of Retaliation applies generally to anyone connected in any way with the Sentido Galo Resort and Alpino Atlantico Ayurveda Hotels, namely:

- a) The workers;
- b) Service providers, contractors, subcontractors and suppliers, as well as any persons acting under the supervision and direction of such entities;
- c) Shareholders and members of management bodies or management or supervisory bodies, including non-executive members;
- d) Volunteers and trainees, paid or unpaid.

Infringements of national and/or EU legislation, whether committed or in progress, may be reported, as well as attempts to conceal them, particularly in relation to:

- i) Public procurement;
- ii) Financial services, products and markets and the prevention of money laundering and terrorist financing;
- iii) Product safety and compliance;
- iv) Transport safety;



- v) Environmental protection;
- vi) Radiation protection and nuclear safety;
- vii) Food and feed safety, animal health and animal welfare;
- viii) Public health;
- ix) Consumer defence;
- x) Protection of privacy and personal data and security of the network and information systems;
- xi) Corruption and related offences;
- xii) Violation of the Code of Conduct.

HOW THE WHISTLEBLOWING CHANNEL WORKS

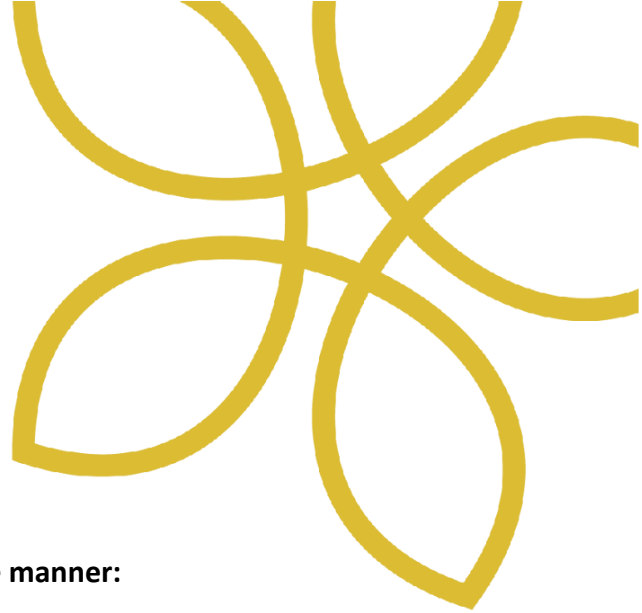
Lucillumar's Whistleblowing Channel is a secure system for reporting offences or harmful situations in the public interest, made available to its employees.

Concerns may be reported at any time, anonymously or with the whistleblower's identity identified, by e-mail to denuncias.galoresort@sentido.com or by post to the following address "Nuno Correia Ferro. Hotel Sentido Galosol. Rua D. Francisco Santana. 9125 - 031 Caniço. Santa Cruz". The whistleblower may also request a personal meeting to present his/her case orally, if he/she so wishes. The person responsible for receiving and following up on complaints is Nuno Correia Ferro, the company's lawyer.

Alternatively, please use the REWE Group Hintbox on the following [link](https://rewe-group.hintbox.de/)
<https://rewe-group.hintbox.de/>

This internal channel ensures the completeness, integrity and preservation of the whistleblowing process, the confidentiality of the identity or anonymity of the whistleblower, as the case may be, (the identity of the whistleblower only being disclosed as a result of a legal obligation or court decision) and the confidentiality of the identity of third parties mentioned in the report, as well as preventing access by unauthorised persons.

The relationship between the company and the whistleblower also guarantees independence, impartiality, confidentiality, data protection, secrecy and the absence of conflicts of interest in the performance of duties.



Whistleblowing must be presented in a concrete and objective manner:

In order to be dealt with effectively, the whistleblowing process must be presented in a concrete and objective manner, taking into account the criteria of relevance of the facts, substantiality, good faith and veracity, be duly substantiated, allowing it to be properly framed and analysed, and if applicable the identification of the suspects or all the data considered relevant to identifying the perpetrators, and possible witnesses.

WHISTLEBLOWING HANDLING PROCEDURE

All whistleblowing reports received will be dealt with in accordance with the following general principles:

- a) The follow-up of whistleblowing reports is conducted objectively and impartially;
- b) All the activities promoted within the framework of the handling of whistleblowing reports comply with **Lucillumar's** values and the applicable legislation;
- c) The principle of the presumption of innocence is guaranteed throughout the process;
- d) The investigative acts and, subsequently, the decisions adopted are proportionate, necessary and appropriate to the specific case;
- e) The identity of the whistleblowing, defendants, witnesses and third parties mentioned and/or involved in the whistleblowing report is not disclosed, except as required by law or court decision.

Following the whistleblowing report, the appropriate internal action must be taken to verify the allegations contained therein and, where appropriate, to put an end to the alleged wrongdoing, including by opening an internal investigation or informing the authority competent to investigate the wrongdoing, including the institutions, bodies, offices or agencies of the European Union.

The procedure is characterised by several stages, which take place over a period of three months from the date of receipt of the whistleblowing report, as explained below:



RECEIVING WHISTLEBLOWING

1. The procedure starts with receipt of the whistleblowing report, which can be submitted anonymously or with identification of the whistleblower, via Lucullumar's "Internal Whistleblowing Channel"
2. If the whistleblowing report is made in a face-to-face meeting, the Company will ensure that, with the consent of the whistleblower, a reliable record of the meeting is made (the whistleblower must be allowed to see, correct, approve and sign the record of the meeting).
3. The identity of the whistleblower, as well as any information that directly or indirectly makes it possible to deduce their identity, is confidential and restricted to the person responsible for receiving or following up on complaints.
4. **Lucullumar** will ensure that the whistleblower is informed of the receipt, requirements, authorities, form and admissibility of the external whistleblowing within 7 days of receipt.

CLASSIFICATION AND VALIDATION OF THE WHISTLEBLOWING

1. Assess whether the whistleblowing report concerns one or more of the areas listed in the objective scope of the Lucullumar Whistleblowing Channel.
2. If the whistleblowing report concerns the person responsible for receiving and following up on the report, he/she will be asked to be replaced by an alternate member.
3. If the whistleblowing report does not fall within the scope of the procedure, a closure report will be drawn up, stating the reasons for the closure of the procedure and informing the complainant of the closure of the report and the reasons for it.

INSTRUCTION FASE

1. The investigating officer shall take the necessary steps to establish the facts described in the whistleblowing report by:
 - a) Gathering additional information from the whistleblower, the accused, witnesses, third parties mentioned and/or involved, departments or companies involved;



- b) Conducting interviews;
- c) Carrying out other appropriate research activities.

DECISION PROJECT

1. At the end of the investigation, the designated person shall draw up the final report, which shall include at least the following elements:
 - a) Investigations carried out;
 - b) Proven and unproven facts and their evidence;
 - c) Draft decision, with proposed corrective measures, sanctions / disciplinary actions and timetable.
2. The person in charge of the investigation will send the draft decision for validation to the Chairman of Lucullumar's Board, unless he is the subject of the whistleblowing report, in which case the intervention of the other members of the Board of Directors will be required at the next stage.

DECISION

1. Once the decision has been approved by the Chairman of the Board of Directors or, if the whistleblowing report concerns him, by the other members of the Board of Directors of Lucullumar, the whistleblower will be informed of the decision, the corrective and disciplinary measures to be taken and the reasons for them.
2. The communication will be made within a maximum of 3 months from the date of receipt of the whistleblowing report.

APPLICATION OF CORRECTIVE MEASURES

1. Lucullumar's Compliance Officer will ensure the implementation of corrective measures, including disciplinary actions, in accordance with the timetable set out in the decision, with the direct support of the department(s) involved.



2. The whistleblower will be informed of the status of the implementation of corrective measures whenever required.

CONFIDENTIALITY AND ANONYMITY

All whistleblowers are given the opportunity to report anonymously. However, regardless of whether the whistleblowing report is made anonymously or not, Lucillumar guarantees at all times, throughout the process of investigating the whistleblowing report and even after its conclusion, the confidentiality of the identity of the whistleblower, the accused, witnesses and third parties mentioned and/or involved in the whistleblowing report.

PROTECTION OF WHISTLEBLOWERS AND PROHIBITION OF RETALIATION

Lucillumar undertakes not to take any retaliatory action against the whistleblower. To this end, Lucillumar undertakes not to cause the whistleblower any direct or indirect, pecuniary or non-pecuniary damage, namely through termination, suspension or alteration of the employment contract or otherwise, harassment, threats, intimidation, loss of benefits or any other form of retaliation.

In order for the whistleblower to benefit from the protection afforded by the law, it is necessary that the complaint is made in good faith, i.e. there are serious grounds for believing that the information is true at the time of the complaint or public disclosure.

LIABILITY FOR IMPROPER USE OF THE WHISTLEBLOWING CHANNEL

Lucillumar will not tolerate misuse of the Whistleblowing Channel. A whistleblower who is found to have deliberately acted in bad faith, by making a defamatory or false whistleblowing report, will be subject to disciplinary action under the applicable employment laws.



However, this disciplinary action does not exclude any civil or criminal liability that may arise under applicable law.

The person responsible for managing the whistleblowing channel shall assess any breaches that may have been committed by members of the Board of Directors and will propose to the Executive Board the adoption of the measures it deems appropriate to the situation that has arisen.

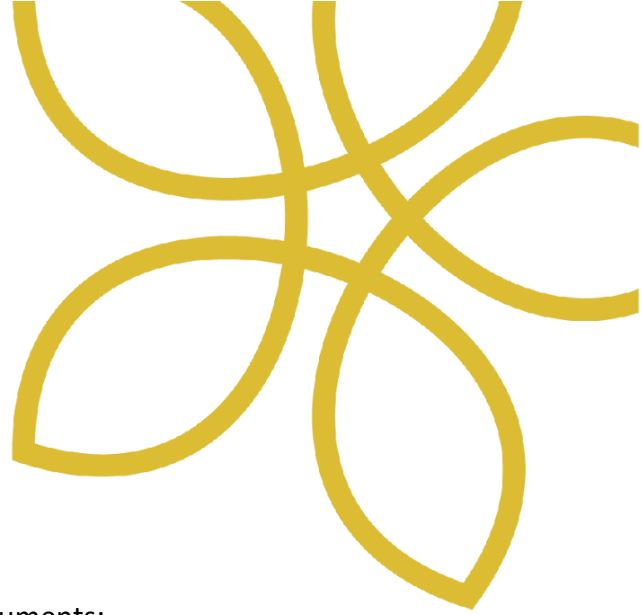
To this end, all employees are encouraged to report any violations of this Policy that they know or suspect to have occurred to Lucullumar's Compliance Officer (they may do so directly through Lucullumar's internal reporting channel) and are assured that they will not be retaliated against for doing so.

DATA PROTECTION

The operation of the Lucullumar Whistleblowing Channel may involve the processing of personal data of the whistleblower, the accused, witnesses and third parties mentioned and/or involved in the whistleblowing report. In this regard, Lucullumar undertakes to process personal data lawfully, to collect only the relevant information, to keep such data for the time strictly necessary for the specific purpose for which it is intended, and not to share the data with other entities, unless expressly authorised by the data subject or required by law. In this sense, Lucullumar guarantees that the processing of personal data strictly in accordance with the Lucullumar Privacy and Personal Data Policy.

RECORDING AND RETENTION OF WHISTLEBLOWING INFORMATION

Lucullumar will maintain an up-to-date record of the whistleblowing reports received for a period of five years and, irrespective of this period, during the pendency of any legal and/or administrative proceedings arising from such whistleblowing reports. It is the responsibility of Lucullumar's Compliance Officer, who has restricted access, to properly record and store the whistleblowing reports received.



REFERENCE GUIDELINES

This policy should be read in conjunction with the following documents:

- a) Internal Whistleblowing Channel - Lucullumar
- b) REWE Group Code of Conduct;
- c) Plan for the Prevention of Risks and Related Offences - Lucullumar
- d) Lucullumar's Privacy and Personal Data Policy

ENTRY INTO FORCE

This Policy will take effect on the date of publication.

Canico, 5th June 2026

The legal representative of the Lucullumar – Sociedade Hoteleira e Turismo, S.A.,

Frank Siebrecht
Administrator



REWE GROUP CODE OF CONDUCT



CONTENT

PREFACE

Page 3

#1 APPRECIATIVE: Interacting with each other

Page 4

#2 LOYAL: Our public appearance

Page 5

#3 FAIR: How we behave in the face of competition

Page 6

#4 RELIABLE: Protecting both property and data

Page 7

#5 STRAIGHT AHEAD: Taking action when conflicts of interest arise

Page 8

#6 HONEST: Our commitment against corruption

Page 10

#7 SUSTAINABLE: Shouldering responsibility for the future

Page 12

INFRINGEMENTS AND THEIR CONSEQUENCES

Page 14



"Together, let us act as role models
in the actions we take."

Lionel Souque

Dear Colleagues,

"TOGETHER FOR A BETTER LIFE." That's our mission. And we can only do it justice if we really pull together. Our Code of Conduct is aimed at each and every employee – including managers – as well as the executive management of the REWE Group.

As a source of advice and guidance, it will help us to do our work every day in a way that allows us to achieve our goals: be it at every step, with every contact, every decision and every single action.

Our Code of Conduct describes seven core values for our professional conduct: it calls on us to create a culture characterised by mutual **appreciation** and **loyalty**. It defines **fairness** and **reliability** as the guiding principles of our everyday work. It requires us to act in a **straightforward** manner, to always be **honest** and to ensure that the approach we adopt is **sustainable**, in order to deliver a better quality of life.

Please internalise and embrace our Code of Conduct! Not only does it represent our clear commitment to compliance, but also a binding regulation that governs all our actions: internally – when dealing with employees and colleagues; and externally – regarding our contact with customers and business partners. We expect of the latter to also embrace the principles set out in this Code of Conduct, and to work towards their implementation throughout their own supply chain.

Together, let us act as role models in the actions we take.
Our managers have an especially important role model function to play here.
Should you have questions or doubts, please feel free to contact the relevant individual named in this Code of Conduct.

Yours, **Lionel Souque**
Chief Executive Officer of REWE Group

WE TREAT EACH OTHER WITH RESPECT.



#1

APPRECIATIVE

Adopting an appreciative approach to colleagues, customers and business partners is an essential prerequisite when creating a sense of true togetherness. Especially within the context of professional life, disagreements and challenging situations may arise that can only be overcome by way of mutual respect. Such a mindset not only helps us to advance, but also the company itself.

Different opinions are not only inevitable – they are indeed needed when it comes to developing our products, services and processes. In this regard, we have to maintain a strong focus on what we do: a lack of personal appreciation will not be tolerated. If we treat people in different ways, there must always be a factual and objective reason for doing so. The **unequal treatment** of others based on their skin colour or ethnic origin, gender, age or sexual orientation, religion or world views, as well as any illness or disability, is discrimination – an absolute taboo within the REWE Group / Sentido Galo Resort.

Any form of conduct that leads to colleagues, customers or business partners being insulted, humiliated or apportioned any sense of shame is undesirable for the REWE Group. This includes any form of **bullying**. Indications that bullying is taking place can include slander against a colleague and his or her family, the spreading of rumours, threats, insults or forms of harassment. Deliberately defamatory or otherwise undignified forms of treatment

and the deliberate withholding of essential information are also key examples here. **Sexual harassment** in the workplace shall also not be tolerated at the REWE Group / Sentido Galo Resort in any form. This includes any form of sexually explicit or implicit behaviour that someone may find undesirable.

Do you feel that you have not been treated fairly by the REWE Group, or have you observed any such behaviour in others? You have the right to report such behaviour, to be taken seriously in your concerns and to be heard. Every complaint will be carefully investigated. The affected person will be informed of the result. Please do not be afraid to approach your supervisor or to contact the appropriate department directly within your organisation (such as Human Resources or the Works Council).

#2 LOYAL

It is up to each and every one of us to protect and promote the reputation of the REWE Group. Loyalty is the most important requirement in this regard. Inappropriate or otherwise careless behaviour by any employee could cause significant harm to the company. This also applies to public statements.

Company-related statements by employees of the REWE Group Sentido Galo Resort, which are made vis-a-vis the public during **interviews, lectures or in other publications** must not harm the interests and goals of the company. The timing and framework conditions of a publication also play a key role, in addition to the content itself. Please be sure to coordinate all efforts with your supervisor and, in the case of media contacts, with the responsible Corporate Communications department.

Many employees of the REWE Group make frequent use of **social media platforms** such as Twitter, Facebook and Instagram on a private and professional basis alike, while also blogging or participating in forum discussions. A careless statement that would otherwise be quickly forgotten in real life can spread rapidly

online and be read by a huge audience. Therefore, when using social media outlets, a selection of rules must be observed, in order to safeguard the interests of the REWE Group, its customers, business partners and its employees. Thus, whether online or offline, no internal information or other types of confidential company data may be disclosed. In addition, the tone should always remain polite. The rights of others, e.g. personality rights or copyrights, must be observed at all times.

Do you have further questions about this topic? Your supervisor and the responsible Corporate Communications department will be happy to provide you detailed information.

WE PROTECT COMPANY INTERESTS IN PUBLIC.



WE PLAY FAIR IN THE FACE OF COMPETITION.



©DOUGAL WATERS

#3 FAIR

It goes without saying that the REWE Group / Sentido Galo Resort always behaves in an appropriate way towards its competitors. Fair competition is the driving force of our market economy: it creates efficiency, fosters innovation and ultimately generates greater choice for customers and consumers alike.

We do not participate in **anti-trust arrangements** with other market participants. This also applies to any form of action that aims to unlawfully influence the competition.

We act responsibly from our competitive position and ensure that we do not hinder other market participants by deploying anti-competitive measures or violate the requirements of anti-trust law.

A business partner has proposed a strategy and you are uncertain as to whether it complies with the rules of fair competition? Are you unsure of whether your conduct (present or future) meets the terms of competition or antitrust law? Please feel free to contact your responsible Legal department.

#4

RELIABLE

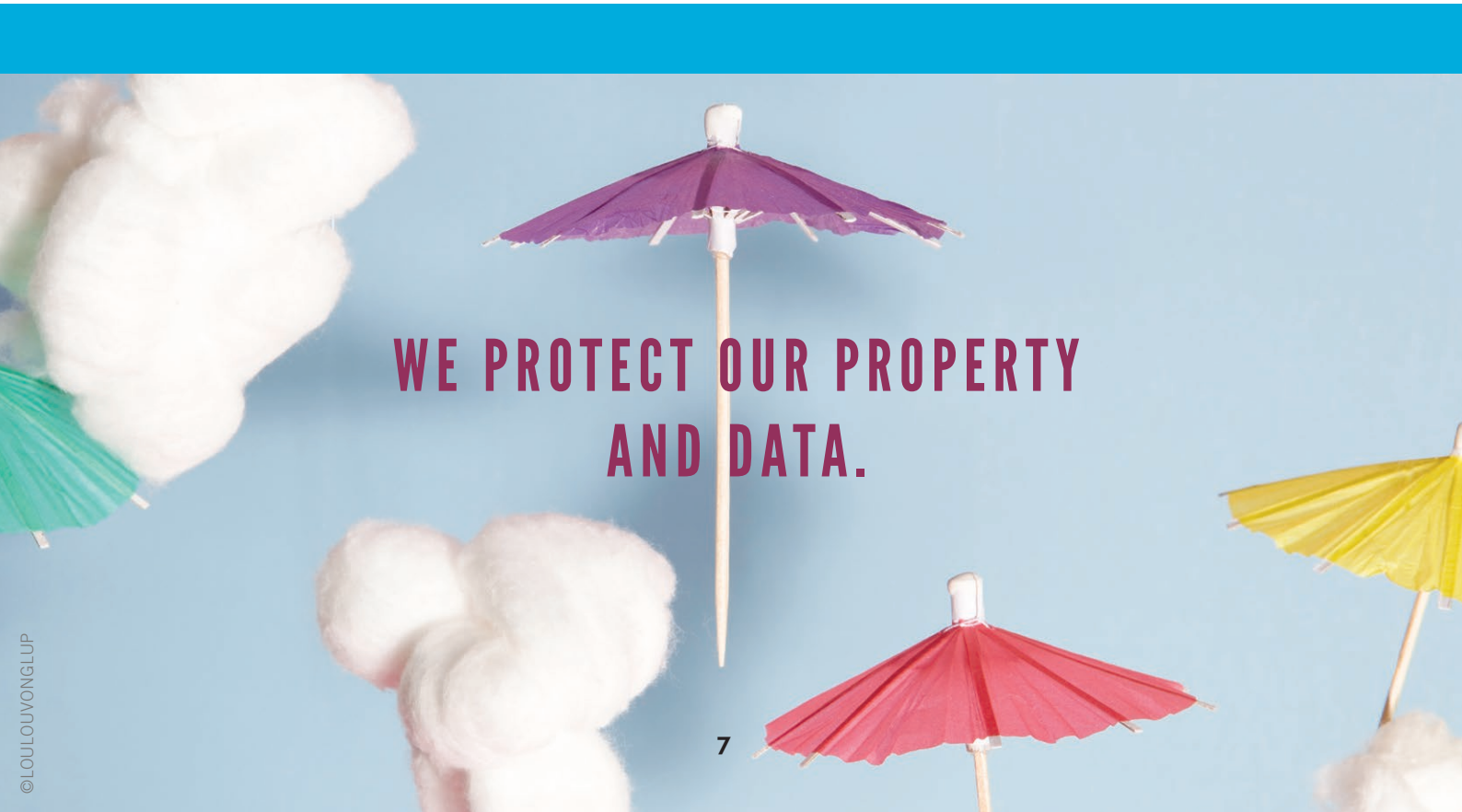
**Thanks to our commitment and performance,
we create new tangible and intangible assets on a daily basis.
We expect reliability from every REWE Group / Sentido Galo Resort
employee when dealing with this capital on a daily basis. This includes
protecting any company property from the threat of abuse, damage or
loss.**

The assets held by the REWE Group not only include products and services, but also workflows, databases, the company's brand image and our relationships with customers and other businesses. These all require a conscientious approach.

Business and trade secrets are also a key part of this – not disclosing any such information is of critical importance – both during the term of your employment and after it has come to an end. This also applies to information entrusted to you by third parties throughout the course of your work. When handling personal data (e.g. customer data, or data pertaining to employees or business partners), it is of the utmost importance for the REWE Group to comply with the legal requirements governing the processing of such **data**, as well as the company's internal guidelines on this topic.

Electronic devices, equipment, work materials or other **company property** may only be used for private purposes or removed from the company premises with the express prior consent of your supervisor – unless this has otherwise been provided for by the company or its policies. This shall also apply to goods that are not (or no longer) eligible for sale.

Should you require further information about protecting data and safeguarding company ownership, please contact your supervisor as a first step. In order to protect business and trade secrets, the Corporate Security department can provide you with competent advice, and with regard to the issue of data protection, your responsible data protection coordinator or data protection officer is on hand as your expert source.



**WE PROTECT OUR PROPERTY
AND DATA.**



WE DRAW A CLEAR LINE BETWEEN PROFESSIONAL AND PRIVATE INTERESTS.

©RICHARD DRURY

#5 STRAIGHT AHEAD

Many individuals engage in cultural, political, sporting or other social activities outside of working hours. Some also have a secondary job or are involved in other companies. Across all our activities, we pursue very different goals. When private endeavours conflict with company interests, this represents a conflict of interest that must be resolved without deviation.

Conflicts of interest often arise through a so-called secondary activity. You may pursue such an activity if you adhere to certain rules. The REWE Group expressly welcomes your **voluntary commitment** to (or the assumption of a role within) an association or other public or not-for-profit organisation, if you can continue to fulfil your employment obligations, if your secondary employment is compatible with your position within our company, and if the good reputation of the REWE Group is not impeded. Naturally, these conditions shall also apply if you wish to pursue paid secondary employment. You must always report this in advance to your responsible Human Resources department and your supervisor. Your employer may prohibit you from taking up (or continuing with) work in the form of paid secondary employment, if there are reasonable grounds for suspicion that your secondary employment will affect the fulfilment of your employment obligations.

In principle, you are not allowed to work for competitors of the REWE Group.

You may only acquire shareholdings in companies operating within the direct business environment of the REWE Group upon the prior written consent of the responsible Human Resources department. This shall also apply in cases involving executive bodies; for example, if you wish to take up a position in such a company as an executive director. Existing shareholdings or executive bodies that are subject to such an approval requirement must also be reported to the Human Resources department. Of course, this shall not apply if you have only invested your money in investment funds with a broad spectrum of investment diversification, or as a small shareholder with holdings in public limited companies: this is of no concern to the REWE Group.



If you or one of your relatives wishes to enter into a **business relationship with a REWE Group company**, caution must also be exercised. There shall be no issue if you or one of your family members—as end customers—purchase services and products offered by REWE Group companies as per a normal business transaction, including placing bookings via the travel agency or making goods purchases in the supermarket. However, assuming that you work on a self-employed basis as a secondary occupation, or someone from your family has a company: if you then wish to conclude, amend or cancel contracts or other types of transaction with yourself or relatives on behalf of the REWE Group, it is essential that you first obtain the written consent of your supervisor. The term family includes not only your partner and your children, but all relatives up to and including the third degree; for example, your nieces and nephews, and any relatives by marriage.

This requirement to obtain consent also applies to contracts and other forms of business with companies and associations in which you or your family members hold a participatory interest, or for which another form of responsibility exists. Please also note: a conflict of interest involving transactions with the companies of the REWE Group

cannot be prevented by way of a colleague either concluding, cancelling or amending the business activity in question, upon your instruction.

As a general rule, one's own position within the REWE Group – or any business contacts resulting from it – may not be misused, either for one's own benefit, or the benefit of another.

Do you have any doubts as to whether you are allowed to take up a certain form of secondary employment? Please contact your supervisor or the Human Resources department responsible for you. You will receive competent advice from here.

Are you wondering whether you might be involved in a conflict of interest? Your supervisor, your responsible local Compliance department or the Central Unit Compliance will advise you quickly and competently on the matter.

#6

HONEST

It is not only companies that fail because of bribery and corruption, our society also suffers considerable damage. That is why we stand up for honest business relationships, and actively oppose corruption and any other form of white-collar crime.

Corruption is the abuse of entrusted power for private gain or advantage. Corruption as an offence is the most prominent form of white-collar crime. In the world of business transactions, bribing business partners and their employees, as well as one's own capacity to be bribed, are considered criminal offences.

In addition, the **handling of public officials** is a particularly sensitive matter: in particular, this category comprises civil servants, representatives or employees of public authorities, other public institutions, state-owned enterprises or public international organisations. Granting advantages and bribing public officials are offences that occur faster than you might think.

This also applies to dealing with elected representatives in the political sphere, i.e. elected representatives of parliaments and governments.

Our conduct should never give rise to the impression that we wish to influence certain decisions by way of **granting benefits**, or that even our own business decisions are available "to the highest bidder". It therefore follows that we must exercise great care, even when we find ourselves in seemingly harmless situations: a small gift around year-end is sometimes not "small" enough, and a business lunch in a posh restaurant comes very close to being construed as an attempt at bribery. That does not mean that business gifts and

WE FIGHT CORRUPTION.

invitations are forbidden, per se.

But these must never be used to influence business or governmental decisions – whether it be our own, or those of business partners or public officials. The acceptance and awarding of such gratuities must comply with all applicable laws and be governed by company policies. And, without doubt, we never ask for benefits from our business partners or other external third parties.

Every one of these rules also applies in conjunction with **donations and sponsorship**. We will ensure that our donations and sponsoring activities remain transparent at all times. In cases involving sponsorship measures, our services must be commensurate

with the agreed consideration.

Are you wondering if you can accept your supplier's invitation to an evening event? You would love to show your appreciation for a successful cooperation, but do not know what is permitted, and what not? Please be sure to familiarise yourself first with the applicable regulations governing the handling of benefits at the REWE Group. Furthermore, your responsible Compliance department and the Central Unit Compliance are available to answer any questions.



WE ACT IN AN ENVIRONMENTALLY
CONSCIOUS AND SOCIALLY
BENEFICIAL WAY.



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#1 SUSTAINABLE

Sustainability is not seen as a trend for the REWE Group, but rather as an essential component of our corporate strategy. This mandate has subsequently been anchored in our guideline for sustainable business. As a leading international company within retail and tourism, we have a special role to play: as an interface between manufacturers, service providers and consumers, we see it as our task to “work together for a better life”.

We promote ever more sustainable product ranges, we act in an environmentally aware and climate-conscious way, we take responsibility for our employees and are committed to nurturing a sustainable society. We are constantly expanding our **offering of more sustainable products** and services. We take a detailed look at our entire supply chain and are committed to meeting the social and environmental challenges we face. Through an effective dialogue with non-governmental organisations and other key partners, we develop guidelines for risk-laden **raw materials**, in order to sensitise and change markets with a view to sustainability, and to establish standards for the future.

We develop measures to reduce the impact of our business processes on the climate and the environment. In doing so, we work above all towards the more efficient **use of energy**, the reduction of key climate **emissions** and a lowering of **resource consumption** rates. Please make every effort to ensure that you behave in an environmentally friendly and resource-conscious way. For example, by using as little paper for printing as possible, by avoiding plastic waste, and by making your way to work on public or zero-emission forms of transport.

In cooperation with national and international **not-for-profit organisations**, we have committed



ourselves worldwide to making an effective contribution to society. For example, we support local food bank organisations, programmes for children and adolescents, or local projects in tourist destinations.

In a policy statement, the REWE Group has committed itself to strengthening **human rights** and preventing their violation. This includes expressing a clear “no” to child and forced labour. Please bear in mind when making decisions in your day-to-day lives that it is your responsibility to live up to these principles.

Dedicated and qualified **employees** make a decisive contribution to the success of our company – and we place great importance on promoting their satisfaction and performance.

To this end, we offer our employees fair pay, a host of additional company benefits, flexible working time models and individual offers that help to strike the right balance between work and private life.

If you have any concerns regarding the working conditions at the REWE Group, your supervisor or your responsible Human Resources department should be your first port of call.

Our Sustainability department will be happy to explain how the REWE Group / Sentido Galo Resort can help you protect our environment or get involved in social programmes.

INFRINGEMENTS AND THEIR CONSEQUENCES

Every single employee must, without exception, comply with all statutory requirements, this Code of Conduct and other relevant regulations of the REWE Group and Sentido Galo Resort. Managers have a special role model function here.

Anyone deemed to be in violation of the rules while working for the REWE Group must, depending on the nature of the infringement, be subject to employment law sanctions, claims for damages by the employer or even criminal proceedings.

SIMPLY SUBMIT COMPLIANCE TIPS DIGITALLY

To ensure a professional and convenient procedure for handling compliance tips, we have set up a digital reporting system for you: the Sentido Galo Resort Internal Whistleblowing Channel. It is available to both Sentido Galo Resort employees and external parties - such as business partners or suppliers - via

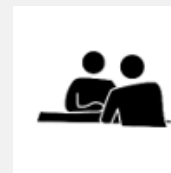


**SUBMISSION OF
COMPLIANCE TIPS**
anonymous if desired

SIMPLY DIGITAL



OR



IN PERSON, BY PRIOR APPOINTMENT

OR



BY POST

Send a letter to the following address:
Att. Nuno Correia Ferro
Hotel Sentido Galosol
Rua D. Francisco Santana.
9125 – 031 Caniço. Santa Cruz

Sentido Galo Resort Internal Whistleblowing Channel
denuncias.galoresort@sentido.com

Tips that you submit via the Sentido Galo Resort Internal Whistleblowing Channel are automatically assigned to the responsible Compliance department and handled with complete confidentiality. You can be assured that your data will be protected and that your information will only be forwarded to the departments responsible for processing your tip. Of course, you can also use the Sentido Galo Resort Internal Whistleblowing Channel anonymously so that your identity remains confidential.

In any case, you must not suffer any disadvantages in a professional context as a result of submitting your tip - irrespective of whether the tip is confirmed as a compliance case or not.

Please ensure that this Code of Conduct is implemented and fulfilled throughout every single day of business life.

WHAT INFORMATION IS REQUIRED

In order to process your compliance tip, the contact partner within the Compliance department needs to understand exactly what has happened. Therefore, it is important for you to describe the facts as precisely and comprehensibly as possible, including for third parties. These questions can help:

- What has happened?
- Who is involved (names of individuals should ideally be mentioned with a function or position)?
- Where has this happened (e.g. which store, which department, which company)?
- When did this happen (e.g. data, time frames)?

Of course, this does not mean that you have to answer all the questions. However, the more information you provide, the sooner a complete clarification of your tip is possible.

Sentido Galo Resort (Lucullumar, S.A.) ensures that the complainant is notified of the receipt of the complaint, as well as the requirements, the relevant authorities, the procedure and the admissibility of the external complaint, within a maximum of 7 days from receipt.

If the complaint falls outside the scope of application, a report on the closure of the case will be drawn up, setting out the reasons justifying the closure of the proceedings, and the complainant will be notified of the closure of the complaint and the grounds for it.

WHY EVERY TIP MATTERS

We would like to expressly encourage you to report any violations of the relevant statutory regulations, the requirements of this Code of Conduct or other REWE Group guidelines – in the interest of our honest employees and for the sake of protecting all REWE Group companies. This applies in particular with regard to suspected corruption, and to any anti-trust violations. This is because, in a worst case scenario, the company's very existence could be threatened. We also appeal to our business partners and customers alike to report any violations that affect the REWE Group companies or its employees, or which are related to our business activities.

Please report any known violations and be a role model of integrity and loyalty with your own actions!



REWE-ZENTRALFINANZ eG
Central Unit Compliance

Domstraße 20
D-50668 Cologne

compliance@rewe-group.com