

*Ethics and Corporate
Social Responsibility
Charter*



ACCOR

CHAIRMAN'S MESSAGE	2
ETHICS AND CORPORATE SOCIAL RESPONSIBILITY COMMITTEE MESSAGE	3
TO WHOM DOES THIS CHARTER APPLY?	4
HOW SHOULD THE CHARTER BE USED?	4
WHO SHOULD I CONTACT IF I HAVE A QUESTION ABOUT THE CHARTER?	5
WHAT SANCTIONS OR PENALTIES COULD I INCUR FOR NOT COMPLYING WITH THE CHARTER?	5

1

Our values

p 6

2

Our commitments as a principled business

p 8

2.1 RESPECTING PEOPLE	9
2.2 RESPECTING BUSINESS RULES AND ETHICS	17
2.3 RESPECTING PROPERTY AND DATA	26
2.4 RESPECTING OUR PARTNERS	34



3

Our commitments as a responsible employer

p 36

3.1 RESPECTING WORKING CONDITIONS	37
3.2 RESPECTING CAREERS	43

4

Our commitments as a company invested in the community and the planet

p 46

4.1 RESPECTING THE ENVIRONMENT	47
4.2 RESPECTING LOCAL COMMUNITIES AND SOCIETY	51

5

Keyword glossary

p 57



Chairman's message

For more than 50 years, Accor has been building a reputation as a pioneer in the hospitality business. Opening up new avenues, reshaping our business and anticipating changes in the world around us have always been at the core of our values and commitments. Accor has regularly reinvented itself over the course of its history and is now at an important stage in this transformation process.

The sale of AccorInvest has brought a change to our economic model, thus shifting the boundaries of our responsibilities. We have sold off our real estate portfolio, focusing more closely on our hospitality business and devoting our energies to the management of thousands of hotels worldwide under our own brands and primarily under management or franchise agreements. At the same time, we have broadened and enriched our services offer creating a global ecosystem extending way beyond the hotel business. We are therefore able to offer our guests limitless trendsetting experiences and ever more innovative services.

This new vision is sustained by impassioned teams worldwide who exemplify it and give it life. We share it with hotel owners who have put their trust in us, our partners who associate their brand with ours and our suppliers.

I would like to highlight here just how ambitious and challenging this vision is. Every gesture and every aspect of how we behave impacts, more than ever, on the host communities in which we work. We are responsible for every deal and transaction. The care we take wherever we are in the world to respect the highest ethical principles, the way we assume our social, societal and environmental responsibilities and the force of our commitment in matters of ethics, integrity and legal compliance, and above all, our zero-tolerance of any form of corrupt practice, are core facets to the sustainability of our project. It is crucial that we conduct our expansion in an ethical, balanced and respectful way.

Leaving aside all issues of performance, the universal values of integrity and respect so actively promoted by Accor have always set us apart from others in the industry. Our culture and expectations are strong. This is the bedrock of our heritage and is still the cornerstone of our combined commitment. Let the Ethics and CSR Charter you have in your hand guide us and assist us all in our daily decisions. I know I can count on you to embrace it and give it life day after day to deliver on our vision of a growth that is sustainable and rewarding to us all. My thanks to each and every one of you for this commitment.

Sébastien Bazin
Chairman and CEO



A message from the Ethics and CSR Committee

The purpose of this Ethics and CSR Charter is to help you to understand our expectations for all Accor staff members at every echelon of the business, worldwide and without exception, by defining fundamental principles illustrated by various examples of situations encountered in our daily work.

These principles are not designed as a mere reminder of our need to comply with the law. Their objective is also to promote fair, honest and exemplary professional conduct in every case and circumstance.

Ethical conduct is a duty for each and every one of us.

The aims of this Ethics and CSR Charter can only be achieved through the commitment, focus and sense of responsibility of each individual. It is a foundation of Accor's values, reputation, corporate image and the trust invested in the Group by stakeholders: employees, guests and customers, suppliers, local communities, public authorities and society in general.

The directives, instructions and guidelines contained in this Ethics and CSR Charter are not optional or discretionary:

- / you should comply with them in their spirit and to the letter; and
- / you should set an example in how you behave and in what you do.

You will be proud to belong to an ethical and values-based company.

The Ethics and CSR Committee



TO WHOM DOES THE CHARTER APPLY?

This Charter applies to all Accor Group personnel worldwide, i.e. all permanent and temporary employees, agents and representatives of Accor, its subsidiaries, companies under its control.

The Charter also applies to the permanent and temporary employees of hotels and properties managed under Accor brands.

Finally, the rules set forth in this Charter are also intended to apply to all Group partners, including customers and suppliers, in the framework of their contractual relations with the Group.

Group managers and hotel general managers have a particular responsibility for promoting the values and commitments defined in this Charter to those working with them, and for overseeing their application and implementation.

The Charter, which is communicated to new employees when they start work, is also available on various intranet sites, allowing every staff member to consult its terms, as needed.

It has also been released to the public on the www.accor.com website.

This Charter is regularly updated to take into account changes in the Group's activity or the legal and regulatory landscape.

HOW TO USE THE CHARTER?

It is vital for the Accor group to respect and comply with a multitude of laws and regulations resulting from the geographical diversity of the locations worldwide in which it does business.

It is not the purpose of this Charter to provide a list or explanation of all the laws, regulations, agreements, internal directives and guidelines governing the work and business activities of the various Group companies and their staff. Nor is it intended to include all the situations encountered by managers and employees in the course of their duties. There are many instances not covered by laws, regulations, internal or external rules and standards. In these situations, respect, integrity and fairness are the tenets that should govern individual conduct, without prejudice to local laws and regulations.

Every employee should be careful, cautious, attentive and use common sense and good judgment.

It is therefore not the aim of this Charter to provide a comprehensive list of expected behaviours for each situation but to offer cues and indicators, pinpointing the spirit and mindset that should govern every decision.

Situations may not always be simple but be guided by this Charter in every decision and consider the following pivotal questions:

- / 1. Is it **lawful**?
- / 2. Is it **compliant** with the Ethics and CSR Charter?
- / 3. What will the **consequences** of my action or inaction be?
- / 4. Would I be **comfortable explaining and justifying** my decision were it known to the Group or outside world?



WHO TO CONTACT OR A QUESTION OR PROBLEM RELATING THIS CHARTER?

Employees may, in any circumstances, where they have a concern, are uncertain or have a question, discuss it with their managers or supervisors, Ethics and CSR Officers, Compliance Officer¹, Legal Department or Talent & Culture Department².

They may also use the Accor Whistleblowing Hotline («Accor Integrity Line») in complete confidentiality to report any conduct or situation that may be contrary to this Charter or any laws, regulations, rule or standards defined by treaty or agreement, according to the Group's internal reporting procedure. This alert mechanism is offered on an Internet platform accessible 24 hours a day, 7 days a week and is available in 29 languages.

www.accor-integrity.com

Accor prohibits any retaliation or reprisal against any employee using the Whistleblowing Hotline, in good faith, to express concerns.

WHAT SANCTIONS OR PENALTIES FOR NON-COMPLIANCE WITH THIS CHARTER?

Failing to comply with the Ethics and CSR Charter may incur severe penalties for the Group but also individually, for any executive or employee implicated in a breach of its principles.

Any action in breach of the Ethics and CSR Charter rules may also cause financial losses to the Group, may damage its image or impugn its reputation.

A breach may also result in:

- / disciplinary action (e.g. dismissal on grounds of serious misconduct), penalties under the civil law (e.g. damages) and criminal law (e.g. fines and/or imprisonment) against any Group employee involved in this conduct;
- / termination of a business relationship with a partner failing to embrace or satisfy Ethics and CSR Charter values and principles.

¹/ Compliance Officer: employee whose job it is to oversee implementation of the Group's compliance programme, covering the prevention of bribery, corruption and trading in influence, competition law compliance and the avoidance of conflicts of interest. A list of compliance officers, country by country, is available on the Ethics, CSR and Compliance intranet.

²/ T&C: Talent & Culture is the department overseeing all aspects of human resource management: Compensation & Benefit & Recognition; Talent Acquisition; Talent Management; Business Partner HR; Personnel Management; Learning & Development; HRIS and Labour Relations, including Diversity and Ethics



1

6 Values at the heart of our code of conduct

*Our values are our common «language»,
they drive us every day.*

*Embodied in and flowing through our «Heartist»
programme, a symbol of our identity and culture,
these values are the bedrock that binds us to the Group.*

*They perpetuate and spread -beyond professions,
persons, countries and cultures- the sense of hospitality
and service, our strength and nourishment of the
Group's success worldwide.*



GUEST PASSION

We obsess over our customers. Our guests are the driver of our decisions and our actions. We put them first, we care for them. We go the extra mile for them. We enjoy doing it.

SUSTAINABLE PERFORMANCE

We believe that hospitality has the power to unlock a better tomorrow. We act for good to support & empower the communities in which we live and protect the planet that you visit.

RESPECT

We are connected with the world, and to others. We enjoy the mix of cultures. We are proud of our differences. We put you first and we value you, whoever you are. We care for the planet.

SPIRIT OF CONQUEST

Our guests are globetrotters, and so are we. We want to be where they want to be. We explore, we initiate, and we develop. We are ambitious for our guests. We make the impossible possible, we have fun doing it.

INNOVATION

We dare to challenge the status quo. We embrace innovation and challenge ourselves to do things better and faster. We take risks, dream the impossible and make it possible...

TRUST

Hospitality is a team sport, and we're stronger when we trust and support each other. We believe in natural kindness, respect our differences and value all voices. We work as one team, to say what we do, and do what we say.



2

Our commitments as a principled business

2.1 RESPECTING PEOPLE

2.2 RESPECTING BUSINESS RULES AND ETHICS

2.3 RESPECTING PROPERTY AND DATA

2.4 RESPECTING OUR PARTNERS



2.1 RESPECTING PEOPLE

There are many laws designed to protect a company's direct partners (guests, customers, employees and suppliers) and sometimes people in indirect contact.

Accor tracks compliance with these laws with care and attention, in particular, by ensuring that the practices of our suppliers and service providers satisfy the Group's commitment to respecting people. In the event of a breach, Accor will implement a corrective action plan with the partner and, if the results are not satisfactory, will sever all relations with that supplier or service provider.

2.1.1 PROMOTING FUNDAMENTAL WORKERS' RIGHTS WITHIN THE ACCOR ECOSYSTEM

FORCED LABOUR

Forced labour is defined as work coerced by threat or intimidation.

Accor exercises meticulous scrutiny of any suppliers and service providers that may be using the labour of people coerced into working by threat or intimidation. Should this prove to be the case, Accor will implement a corrective action plan with the partner and, if the results are not satisfactory, will sever all relations with that supplier or service provider.

UNDECLARED LABOUR

Undeclared labour consists of employing individuals off the payroll without registering them with national tax, social security and employment authorities, thus depriving employees of their social benefits and the government of payroll taxes and social contributions levied on their labour.

Accor pledges never to use clandestine, undocumented or any other form of undeclared labour in any host country and will ensure that directives are issued to this effect.

CHILD LABOUR

Child labour is defined as any economic activity performed by children that deprives them of their dignity and is harmful to their normal physical and mental development.

Accor pledges:

- / to comply strictly with the minimum legal working age in each host country and never to employ a child under the age of 14 in any country;
- / to be extremely vigilant when choosing its suppliers and service providers;
- / to refuse to work or immediately stop working with any supplier or service provider operating in breach of child labour laws, employing children aged under the legal limit or less than 14 years old.





YOU SHOULD ALWAYS

- / exercise careful scrutiny over suppliers and service providers that may be using the labour of people coerced into working by threat or intimidation;
- / comply strictly with the minimum legal working age in each host country;
- / exercise the utmost care and attention in choosing suppliers and service providers.



YOU SHOULD NEVER

- / engage in or continue business relations with a supplier or service provider that is not, or is no longer, in compliance with these mandatory rules;
- / employ a child under the minimum legal working age in force in any host country; or ever employ a child under the age of 14 in any country;
- / put any employee to work without complying with the applicable staff recruitment rules and declaring their labour.



IS THIS ETHICAL?

Situation: a number of my kitchen employees have fallen ill. I need to replace them as a matter of urgency. To help in this process, an employee has brought a young nephew of his into work, offering him the opportunity to discover the world of work. Because there is urgent work to be done, the nephew, voluntarily and without prompting, begins helping employees by unloading supplies. What should I do?

Solution: irrespective of the urgency or seriousness of the situation, you should never hire any employee without complying with the employee recruitment and declaration procedures beforehand nor should you ever allow a person to start work without checking that they are permitted to work at their age and according to their status, failing which you may be criminally liable and subject to disciplinary sanctions. You should report this immediately to your manager, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative.



2.1.2 PROSTITUTION, PANDERING

Prostitution is the act of engaging in sexual relations in exchange for money.

Pandering is the act of aiding a prostitute or contributing to the prostitution of another by arranging a sex act with a customer in exchange for money or other reward. Procuring is a criminal offence in many countries. It is therefore an offence for the operator of a hotel or other accommodation knowingly to allow premises to be used for the purposes of prostitution and to accept money or reward in exchange for permission.

Accor pledges:

- / not to encourage, organise or, above all, profit from the trafficking of human beings, including for sexual exploitation – i.e. prostitution;
- / to bring information about any reprehensible conduct in this regard to the attention of the authorities.



YOU SHOULD ALWAYS

- / ensure that the company's businesses and all Accor premises are never used for organised prostitution purposes;
- / bring information about any discreditable or reprehensible conduct in this regard to the attention of the appropriate authorities.



YOU SHOULD NEVER

- / disregard or keep from management any incidence of prostitution or procuring that you may suspect in the hotel or accommodation where you work.



IS THIS ETHICAL?

Situation: a guest arrives at the hotel with a person she introduces as his or her spouse. However, a hotel housekeeping employee tells you that this person has been receiving multiple visitors, suggesting that the/she may be using the hotel room for prostitution. What do you do?

Solution: you should immediately report any behaviour supporting a legitimate belief that a person may use our premises for organised prostitution purposes to management for appropriate action to be taken, including, where necessary, reporting the matter to the authorities for investigation.



2.1.3 CHILD PROTECTION

Sex tourism and violence against children crosses geographical, social and cultural borders. Fighting the sexual exploitation of children means assuming responsibilities as a tourism business. It is Accor's moral duty to pledge itself to protecting children from abuse. Accor is doing so through its «WATCH» programme and partnership with ECPAT International (*End Child Prostitution, Pornography and Trafficking of Children for Sexual Purposes*).

Accor pledges:

- / to be extremely vigilant that minors are not in any way associated with Group businesses being subjected to paedophile acts and that Group premises are not being used for procuring children for sexual purposes
- or for producing, distributing or holding pornographic images of minors or other media embodying such images;
- / to ensure that this policy is implemented by:
 - signing and pledging to enforce the principles of Code of Conduct published by ECPAT and the World Tourism Organisation in a maximum number of countries;
 - rolling out the WATCH programme worldwide, training and raising employee and guest awareness to detecting and reporting risk situations;
 - associating suppliers and partners with this child protection initiative;
 - reporting cases of sex tourism involving children to the authorities.



YOU SHOULD ALWAYS

- / be extremely vigilant that, in connection with Group businesses, minors are protected from paedophile acts and that Group premises are not being used for procuring children for sexual purposes or for producing, distributing or holding pornographic images of minors or other media embodying such images;
- / bring information about any discreditable or reprehensible conduct in this regard to the attention of the authorities;
- / ensure that employees are trained and told how to detect and report sexual abuse or exploitation of minors.



YOU SHOULD NEVER

- / disregard the WATCH programme child protection rules;
- / neglect to report suspected cases of child sexual exploitation to management.



IS THIS ETHICAL?

Situation: an adult arrives at reception accompanied by a young child that he introduces as his son. The child refuses to make eye contact, appears very ill at ease and is reluctant to speak. What should you do?

Solution: ask to see the child's identity papers. If the adult refuses, ask him to wait and refer the matter to your service manager. As a last resort, the manager may decide to contact the local police while making sure that the adult and child do not leave the hotel.



2.1.4 EQUAL ACCESS

Accor applies an equal access policy to facilities and services provided to guests and employees.

to time that, to the best of their ability, guests and employees can, as far as possible, access and use the IT infrastructure, equipment and facilities it provides, uses or operates.

Accor pledges:

- / to recognise the individual diversity of its guests and employees. We are committed to eliminating all sources of discrimination in our business offers, IT infrastructure, facilities, equipment and buildings, and in our practices, procedures and management processes;
- / to ensure, in compliance with the applicable legislation and standards in force from time



YOU SHOULD ALWAYS

- / be careful that there is no source of potential discrimination in Group facilities, equipment and buildings or in its practices, procedures and management processes;
- / take care, in compliance with the applicable legislation and standards in force from time to time, that the infrastructure, equipment and facilities provided, used or operated are, to the extent possible, put to their best use.



YOU SHOULD NEVER

- / allow a situation, source of proven or potential discrimination, to persist without reporting it to management, preventing or delaying it and implementing corrective solutions;
- / allow any form of discrimination to arise as a result of what you say or do.



IS THIS ETHICAL?

Situation: a visually impaired person could join my team. However, I'm afraid that this person's disability may not allow him or her to be as effective as the other team members. What should I do?

Solution: this is a misconception. The recruitment of any individual, whether or not disabled, is based on skill and will not lead to working relationship disparities. The only difference is that you should check workstation compatibility. Adjustments may need to be made.



2.1.5 SAFETY AND FOOD HYGIENE

Regardless of the hotel, brand, location or country, safety is one of the fundamental principles of the hospitality business. Safety is also a matter of complying with local legislation and standards, supplemented by Accor's own rules and guidelines. It also involves maintaining open and transparent relations with the public authorities in charge of enforcing food safety and hygiene rule compliance.

Accor strives to welcome its guests in the most efficient and pleasant way possible. To minimise risk to guest safety, we have introduced:

- modern fire prevention engineering methods based on four performance criteria: limiting the risk of a fire starting,

limiting the risk of fire and smoke spreading, facilitating the evacuation of all persons at risk and enabling emergency services to respond quickly and efficiently;

- standards to prevent the development and spread of legionella bacteria in our hotels, with samples analysed by certified laboratories;
- an internal food safety and hygiene tracking policy in all of our restaurants, with inspections by certified companies.



YOU SHOULD ALWAYS

- / understand and comply with Accor safety and food hygiene requirements to protect against any risks and dangers associated with the job you do;
- / assist in improving your working environment by remedying dangerous situations and behaviours.



YOU SHOULD NEVER

- / disregard a food safety and hygiene instruction or any safety or hygiene problem in general;
- / neglect to report incidents, even if your own safety is not in danger;
- / hesitate to ask questions if you have doubts about any safety or hygiene directive or instruction.



IS THIS ETHICAL?

Situation: you notice that the use-by date of foodstuffs about to be served to customers has expired. Despite you bringing this matter to your manager's attention, he tells you that the same thing happened a few days ago with the same foodstuffs, that no-one has been taken ill because the use-by date only expired a few days ago on products not considered at risk and that, besides, as a result of tight budgets, these products cannot be thrown away.

Solution: in addition to the rule breach, quality and image issues, this situation presents a potentially serious health risk. You should report it immediately to your Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative or notify it in accordance with the applicable «**Whistleblowing Procedure**».



2.1.6 SECURITY

Security involves preventing and responding to malicious or malevolent attacks on people and property and combating crime posing a potential threat to our guests, employees and infrastructure. This is the shared responsibility of the Group and the authorities in countries with which Accor is keen to maintain open and transparent relations. Security is a defining component of the products and services that we offer, and one of our guests' primary expectations.

Accor will oversee guest and employee security in its hotels, offices and other facilities by:

- / constantly monitoring and analysing the security situation in both existing and potential host countries and cities;
- / outlining security recommendations based on

the installations, equipment, technologies and security procedures to be implemented;

- / providing security resources and recommendations in line with the specific features of each Group business activity, each region and each hotel segment (economy, mid-range, luxury);
- / making sure that security incidents are reported to the country headquarters and, where the Group may incur liability, to corporate headquarters;
- / auditing security procedures and providing advice and training to employees for the continuous improvement of our protection systems.



YOU SHOULD ALWAYS

- / scrupulously apply existing security directives;
- / roll out suitable management procedures in regions exposed to high level insecurity or specific criminal threats;
- / develop purpose-designed responses built around targeted awareness training, security resources in line with detected threats, and dedicated assistance during guest stays, in the course of employees' everyday work or in response to a country manager's request for operational support in the event of the most serious incidents or violations;
- / immediately report any failing or shortcoming in the implementation of security procedures to your security officer, manager; Legal Department or Talent & Culture representative or via the Whistleblowing Hotline (*Accor Integrity Line*).



YOU SHOULD NEVER

- / underestimate the security situation in Accor host countries;
- / consider that a procedure need not or need only be partially applied;
- / neglect to report any security procedure implementation failure or sensitive situation immediately to management;
- / neglect to apply recommendations.





IS THIS ETHICAL?

Situation: one of your colleagues has allowed a person introduced as a friend to enter parts of the hotel you work in that you know are off-limits to guests. You are aware of the situation. In embarrassment, your colleague asks you to keep this information to yourself.

Solution: this may be a potential security issue and you should report it, without hesitation, to management. The reason for doing so is not to get a colleague into trouble but to protect all Accor employees and guests by preventing unauthorised persons from wrongly entering these premises. What should you do?



2.2 RESPECTING BUSINESS RULES AND ETHICS

2.2.1 PREVENTING BRIBERY, CORRUPTION AND TRADING IN INFLUENCE

Corruption and influence peddling in all their forms are punished as criminal offences, resulting in significant fines and sentences for both companies and individuals involved in corrupt practice, even indirectly.

In accordance with the various applicable laws regarding the prevention of corruption and influence peddling, including the French “Sapin 2” law³, the UK Bribery Act and the US FCPA⁴, Accor has implemented measures to detect and prevent bribery and trading in influence offences in France and abroad.

The Group applies a **zero-tolerance policy** for any offence of this type. Anyone committing such an offence will be liable to disciplinary sanctions that may result in dismissal for misconduct of the employee or employees concerned, civil court proceedings or criminal prosecution.

DEFINITIONS

There are two types of **bribery**:

- / **active bribery** is where a natural person or corporate entity, at any time, induces or seeks to induce another person holding public office or working in the public sector or a person working in a private position or capacity, by means of gifts, promises or advantages, to do, delay or abstain from doing any action relating to or facilitated by their office, duties or work. Such natural persons and corporate entities are described as **bribing parties**.
- / **passive bribery** is where persons holding public office or working in the public sector or persons working in a private position or capacity, take advantage of their job or position, by soliciting or accepting, at any time, gifts, promises or advantages in return for carrying out or abstaining from carrying out any action relating to their office, duties or work. Such persons are described as the parties **being bribed**.

These two offences, although complementary, are separate and self-contained.

Bribery is said to be «public» where the party being bribed is a public official or holds a public mandate and «private» where the party being bribed does not hold public office or work in the public sector.

Trading in influence (or influence peddling) is an offence whereby a person holding public office or working in the public sector or a person working in a private position or capacity, solicits or accepts, at any time, directly or indirectly, offers, promises, donations, gifts or advantages, for themselves or for a third party, to use their real or supposed influence with a view to procuring distinctions, jobs, contracts or any other favourable decision from a public authority, government service or administration.

In the same way as bribery, trading in influence may be:

- / active or passive;
- / private (if the go-between is a private person) or public (if the go-between holds public office or works as a public servant).

Both bribery and trading in influence are totally contrary to Accor’s values:

- / they are unacceptable, irrespective of the reasons for engaging in them; Accor enforces a zero-tolerance policy against bribery and influence peddling;
- / they are damaging to the communities in which we operate;
- / they are seriously damaging to the company.

3/ Law No. 2016-1691 of 9 December 2016 (Transparency, Anti-Corruption and Modernisation of Economic Life Act)

4/ US Foreign Corrupt Practices Act



The Group has published a specific «**Anti-Bribery & Corruption Policy**», setting out a variety of duties with which every Accor employee or partner must comply.

Accor pledges to take all necessary steps to avoid all forms of bribery, corruption or trading in influence in relation to its businesses and to ensure that no direct or indirect remuneration, facilitation payment («facilitation payment» means making an undue payment to a public

official, directly or indirectly, to carry out functions or perform administrative procedures which fall within the scope of his or her duties), advantage or reward is paid or granted under any of its contracts or in its relationship with public authorities, both in France and abroad, or to any public or elected official.



YOU SHOULD ALWAYS

- / check, by means of the «**Know Your Counterparty**» procedure, that your partner presents no particular bribery or trading in influence risk;
- / identify the various forms of inappropriate request or proposal that you might receive;
- / immediately inform your manager, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative or signal an alert on the Whistleblowing Hotline, if you are aware of any behaviour potentially in breach of our anti-corruption and influence peddling policy;
- / satisfy yourself that our commercial partners and agents have been fully informed of our requirements, have received this charter and the anti-bribery, corruption and trading in influence policy effective inside the Group and have pledged to comply with them, in particular where they are representing Accor in countries in which the risk of corruption is perceived to be high;
- / openly and categorically refuse any bribe or other inducement that may be requested or offered and inform your contact that bribes and other attempts at corruption are illegal, are in breach of our policies and that we apply a zero-tolerance approach to such issues.



YOU SHOULD NEVER

- / accept or solicit money or any other reward that may cause or induce you to breach your duty of loyalty to Accor or that may be perceived as likely to influence a business relationship;
- / offer, promise or give money or any other reward to a representative of a public authority, a political party or a person active in political life, a trade union or a person active in trade union activities;
- / offer, promise or give money or any other reward to an employee or representative of a third-party company that may cause or induce them to breach their duty of loyalty to their employer;
- / use agents to have them do what would not be authorised by Accor;
- / keep quiet about corruption attempts you know about or be afraid to report them to your manager, Legal Department, Compliance Officer, Ethics and CSR Officer, or Talent & Culture representative;
- / make cash payments, even of low value, or provide other advantages, benefits or rewards to public officials or civil servants to induce them to agree to carry out some action or function.





IS THIS ETHICAL?

Bribery of public officials: bribing a civil servant, elected official or other public official consists of promising or giving an inducement to act or not to act with the intent to influence a matter connected with his or her work

Example of active public bribery:

Situation: it has come to your attention that the general manager of one of Accor's owned hotels is considering offering a financial reward to a public servant to ensure the prompt renewal of an operating licence. What should you do?

Solution: this is active corruption of a public servant. You should act immediately and explain to the general manager that such practices are not tolerated in the Group. By paying even a tiny amount, the general manager may well be liable to criminal prosecution and disciplinary sanctions resulting in his dismissal. There could also be serious consequences to the Group. You should immediately report this situation to your manager, Legal Department or Compliance Officer.

Example of passive public bribery:

Situation: following a tax audit in a country, you receive a reassessment notice for our company. The basis for this reassessment appears to be unjustified. This is what local tax inspectors sometimes do in the hope of being offered cash compensation in exchange for withdrawing the reassessment. The compensation is very small in value compared to the reassessment. What should you do?

Solution: by paying even a tiny amount, you expose yourself and the Group to criminal prosecution. You also could be subject to disciplinary action resulting in dismissal from the Group. In such a situation, you should immediately notify your manager, Legal Department, Compliance Officer or Ethics and CSR Officer who will assist you to handle the situation appropriately.





IS THIS ETHICAL?

Private bribery: bribery of a person other than a public official by a French company or any of its subsidiaries may result in prosecution regardless of the country in which the bribery was committed.

Example No. 1 of active private bribery:

Situation: a large European company is planning to hold its annual convention in a hotel that needs to see an improvement in its occupancy rate. The contract would involve accommodating three hundred people over two days in the middle of the low season. To obtain this contract, you are considering inviting the convention organiser and his assistant for a week's stay at the hotel to familiarise themselves with its advantages. To weight your chances of winning the contract even more, you are thinking of inviting their wives and children. Is-it appropriate?

Solution: both the convention organizer and his assistant are naturally welcome to stay at the hotel but you should avoid offering them any undue benefits or extras in your drive to win his company's contract. Although you could offer each of them a double room free of charge, this should only be for the two or three days needed to show them the hotel facilities and introduce them to possible event service providers for the convention. However, an invitation to wives and children to stay free of charge at the hotel would clearly be inappropriate or even be considered as an act of private corruption. Issuing the convention organiser with full documentation beforehand, clearly defining the amenities and services included in your invitation and a suggested schedule of meetings, visits and introductions to service providers, etc. is very much recommended. If you have any doubts, you should immediately contact your manager, Legal Department, Compliance Officer or Ethics and CSR Officer.

Example No. 2 of active private bribery:

Situation: during a hotel management contract negotiations with an owners' representatives, you learn of a possible plan to pay to one of the representatives a gratuity or bonus should the contract with Accor conclude successfully. What should you do?

Solution: such a payment could well be considered an instance of active private bribery. You should inform immediately the negotiation team to avoid any such «incentive» payment. You should also immediately report the matter to your manager, Legal Department, Compliance Officer or Ethics and CSR Officer.

Example of passive private bribery:

Situation: you are a Procurement Department employee. You are offered commissions or «kick-backs» by a supplier to increase the volume of goods that you purchase from this supplier. What should you do?

Solution: this situation is one of active corruption by the supplier and passive private corruption if you accept the commissions. By agreeing to take commission, legal proceedings may be brought against you and you may be disciplined by Accor resulting in your dismissal. In such a situation, you should decline the offer and report it immediately to your manager, Legal Department, Compliance Officer or Ethics and CSR Officer.



**IS THIS ETHICAL?**

Trading in influence (or influence peddling) is an offence whereby a person holding public authority, discharging a public service mission or holding a public electoral mandate abuses their real or supposed influence with a view to procuring contracts or another favourable decision from a public authority, government service or administration.

Example of trading in influence:

Situation: a city mayor contacts you to offer him free stays at Group hotels in return for his assistance to you in procuring exclusivity in bidding for a public contract in a tender managed by the Ministry for Tourism. What should you do?

Solution: this is a clear case of influence peddling (the mayor is offering to use his influence with a public authority in order for you to be granted a favour). You should never accede to such a suggestion which would expose you personally to criminal prosecution that would result in heavy fines and imprisonment as well as disciplinary measures resulting in your dismissal. The Group could also be exposed to serious damage, particularly to its reputation and image.

All Group employees should keep firmly in mind that Accor operates a zero-tolerance policy concerning any action or instance of bribery, corrupt practice or influence peddling. If you have any doubts or suspicions that such acts are occurring, you should immediately notify your manager, Legal Department, Compliance Officer or Ethics and CSR Officer.



2.2.2 GIFTS AND INVITATIONS

Accor is firmly committed to combating corruption, trading in influence and conflicts of interest by refusing gifts and personal benefits.

The general rule is that no employee should ever receive or offer a gift or personal benefit as part of a business relationship.

The only exception, unless local legislation is more restrictive, is that non-pecuniary gifts and invitations in the normal course of business relations may be offered or accepted provided their value is reasonable and they are offered outside of any tender offer or negotiation period.

Accor has published a **«Gifts Policy»**. Every employee is expected to comply scrupulously with this policy. It is available for consultation on the Group's Ethics, CSR and Compliance intranet.



YOU SHOULD ALWAYS

- / ensure that gifts and invitations offered or received are appropriate and compliant with Accor's **«Gifts Policy»** and, where applicable, with the other party's gifts policy;
- / satisfy yourself, from the outset of any new business relationship with a partner or supplier, that they are notified of Accor's gift and invitation policy;
- / inform management as soon as possible if you receive a gift or an invitation of a value exceeding the Group limit set forth in the Gift Policy unless the gift or invitation is offered to a group (e.g. a box of chocolates to be shared by a team);
- / fully comply with the "gift policy" of a partner or supplier if it is more restrictive than Accor's policy;
- / comply with all local legal rules regarding gifts and hospitality.



YOU SHOULD NEVER

- / accept or offer individual gifts or invitations with a value exceeding that defined in the **«Gifts Policy»**;
- / accept gifts or invitations connected with your work that are intended for your friends or family or which are sent to you at your home;
- / offer gifts or invitations to a civil servant or public official;
- / offer gifts to family members of any public agent, an employee or representative of a public or private corporate entity.





IS THIS ETHICAL?

Situation: a representative of a very good Accor corporate customer tells you that he would like to celebrate his birthday with a girl friend at a Group hotel and would be most appreciative, given the numerous room bookings already made by his company at the hotel in question, if he could be offered a free two-night stay. Can you accept?

Solution: no, because this solicited gift (of not inconsiderable value) is connected to the work of this representative of the company in question and even if the company is a valuable Accor customer, its representative is trying to elicit a person benefit contrary to the values and principles advocated by Accor.

Situation: A hotel manager invites a journalist and his family to spend a week on an all-expenses-paid basis in the hotel with VIP treatment in exchange for obtaining a laudatory article on the hotel in the press.

Solution: This practice amounts to an act of active private bribery. You must, without delay, inform your manager, your Legal Department, your Compliance Officer or your Ethics and CSR Correspondent of this situation.

2.2.3 PREVENTING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

Money laundering is a criminal offence that consists of being in possession or using funds earned from fraudulent activities: corrupt practices, tax fraud, various forms of trafficking, etc.

Financing terrorism is a criminal offence that consists of providing or collecting sums of money to finance the perpetration of terrorist acts.

Accor pledges to be extremely attentive as regards funds it suspects of originating from, or being intended for, criminal activity. The Group may conduct compliance investigations into the source of the funds where necessary.



YOU SHOULD ALWAYS

- / ensure that you are working with customers, partners and suppliers engaged in lawful and legitimate businesses whose money does not come from criminal activity;
- / exercise caution before engaging in a business relationship with new «counterparties» (hotel owners, joint venture partners, consultants or suppliers) by complying with the «**Know Your Counterparty (KYC)**» procedure, widely circulated to employees who may need to apply it.
- / Check that all payments made by a hotel owner or corporate customer are in conformity with applicable contractual terms and conditions.



YOU SHOULD NEVER

- / agree to cash transactions with a value in excess of the legal limit which varies from country to country;
- / neglect to apply the «**Know Your Counterparty (KYC)**» procedure.
- / Accept payment from a bank account other than the account of the counterparty.



**IS THIS ETHICAL?**

Situation: a hotel owner tells me that he is temporarily unable to pay for certain services provided by the Group from the bank account set forth in the hotel management contract and proposes to make the payment from a bank account in the name of other company and from another country.

Solution: This situation does not comply with Group rules and presents a risk of money laundering. Our contracts with our partners clearly identify all payment details in compliance with Group rules including the account holder and the location of the bank account which must be in the name of the partner and located in its place of domicile. You must immediately inform your manager and the legal department of this situation.

2.2.4 COMPETITION RULE COMPLIANCE

Competition rules restrict anti-competitive behaviour in two ways, by prohibiting:

- / any unlawful agreement or an exchange of sensitive information between competitors, particularly if they involve setting prices or dividing up the market;
- / abuse of a dominant position creating obstacles to fair and healthy competition.

Accor pledges to comply strictly with competition rules in every host country. The Group takes the view that the fewer the competitors, the greater the risk, and that it is in its best interests to operate in markets driven by true, healthy competition. Sharing information not in the public domain with competitors, such as pricing policy and market share, is prohibited because it distorts competition.

Accor has published an «**Anti-Competitive Practice Prevention Policy**» directed at employees (available on the intranet).

**YOU SHOULD ALWAYS**

- / seek advice from your Legal Department or Compliance Officer before any discussions with competitors;
- / refrain from denigrating or disparaging competitors, especially by making inaccurate statements about their products or services;
- / refrain from any actions that might distort competition.

**YOU SHOULD NEVER**

- / be in contact with competitors on matters that are confidential or just not in the public domain;
- / urge or encourage our customers or suppliers to break off their contractual relationships with the Group's competitors;
- / hold, use or pass on confidential information on competitors or take advantage of such information, including where an employee who previously worked for a competitor is the source.





IS THIS ETHICAL?

Situation: a manager from a competitor hotel tells me about an increase in the price of his rooms during the upcoming summer period. This is obviously valuable information. Who can I talk to about it and what can I do with it?

Solution: any exchange of sensitive information with competitors, especially about pricing or discounting policy, is unlawful and may distort competition. In these circumstances, you should put an immediate end to the conversation, you should not disclose the information you have learned to anyone and, given the seriousness of such a situation, you should immediately report the matter to your manager, Legal Department or Compliance Officer.

2.2.5 TRANSPARENCY, COMMUNICATION AND FAIRNESS

Accor pledges:

- / to ensure that tenders, certifications and contracts are awarded following a transparent, equitable process based on objective criteria and that suppliers and service providers are treated with fairness and honesty;
- / to provide regular, responsive and clear communication that offers every supplier and service provider the same level of information;
- / to inform suppliers and service providers individually within a reasonable time of those who have been selected and those not.



YOU SHOULD ALWAYS

- / Treat all suppliers and service providers fairly and honestly;
- / ensure that the same information is provided to all suppliers and service providers submitting bids in answer to calls for tenders and certifications or official listings;
- / set out the Group's Procurement Policy on the corporate procurement intranet.



YOU SHOULD NEVER

- / prefer or advantage one supplier over another in any selection process.



IS THIS ETHICAL?

Situation: two suppliers contact you proposing to combine forces and respond jointly to a tendering procedure without making this clear to other potential bidders. The services provided by both candidates are excellent. What should you do?

Solution: this situation would be unlawful. You should immediately contact your manager, Legal Department, or Compliance Officer.



2.3 RESPECTING PROPERTY AND DATA

2.3.1 INSIDER TRADING

Insider information is explicit, confidential information which, if made public, might impact on the company's share price.

Accor pledges to ensure strict compliance with the market rules applicable to employees who may have access to insider information.



YOU SHOULD ALWAYS

- / protect the secrecy of insider or privileged information to which you may have access.



YOU SHOULD NEVER

- / use insider information for your own advantage (or that of family and friends) or for your (or their) investments. If you do, you may be liable to criminal prosecution, administrative penalties or disciplinary sanctions;
- / disclose insider information to any individual working for the Group or outside it.



IS THIS ETHICAL?

Situation: I have discovered that the Group is about to invest in a number of countries and acquire a competitor. This information has not yet been made public but I thought I might suggest to my parents that they take advantage of the opportunity by purchasing Accor shares. Can you do this?

Solution: absolutely not. You are in possession of explicit, confidential, non-public information which, if it were known to the public, might impact on Accor's share price. You should not buy or sell Group shares until this information has been made public nor should you pass this information on to anyone inside or outside the company. If you do, you will be liable to disciplinary sanctions and severe criminal law punishments.

2.3.2 CONFLICTS OF INTEREST

A conflict of interest occurs when the employee's personal or private interests (financial, business, family or other relationships) may influence or simply appear to influence a decision made by the employee in the course of his/her duty.

While respecting the personal life of its employees, the Group expects them to proactively avoid conflicts of interest. In the context of their professional activities, all Accor employees must act at all times in the interest of the Group.

Accor has introduced rules, procedures and guidelines for disclosing conflicts of interest.

In particular, since 2010, senior executives have been prohibited from acquiring any equity interest in a company owning one or more hotels franchised or managed under an Accor brand.

Accor also requires all employees to disclose any situation where there may be a conflict of interest as soon as they become aware of it, and as far as possible, before taking action.



**YOU SHOULD ALWAYS**

- / notify your manager or your T&C representative if you know of any apparent or real conflict of interest.

**YOU SHOULD NEVER**

- / use your position to make a direct or indirect personal gain or to offer any advantage to a third party to the detriment of Group interests;
- / disregard or keep quiet about any information concerning a conflict of interest.

**IS THIS ETHICAL?****Example No. 1:**

Situation: my life partner works for an Accor competitor. Should I report it?

Solution: this situation may possibly create an impression of a conflict of interest. Management should therefore be informed for steps to be taken, where required, to ensure that both companies' confidential information is protected. You should immediately disclose this conflict of interest to your Talent & Culture representative and inform your manager.

Example No. 2:

Situation: a Procurement Department colleague has an urgent need to find a supplier for one of the Group's brands. He tells me he has no time to follow standard procurement procedure and that a very good friend of his runs a reputable company that can satisfy all of Accor's needs and could deliver the required goods immediately. What should you do?

Solution: allowing for too little time to comply with standard procurement procedure and failing to carry out the requisite internal checks before contracting with a new supplier is not the right way to proceed. The employee is clearly in a conflict of interest situation based on his personal ties with the supplier's general manager, which might act contrary to Accor's interests. If you are in any doubt, speak to your manager or supervisor, Legal Department, Compliance Officer or Talent & Culture representative.



2.3.3 FRAUD

Fraud is generally defined as a deliberate deception by act or omission. As far as companies are concerned, it may involve filing forged, false, misleading or incomplete statements, returns or documents with the intention of unduly or improperly collecting or avoiding payment of monies or procuring information.

Accor pledges:

- / to comply fully with the legislation and standards in force in each host country from time to time, especially the accounting, taxation and customs regulations;
- / to meet all the obligations of a company headquartered and stock market listed in France;
- / to take all necessary steps to ensure that business and financial transactions are properly and truthfully recorded in its financial statements, which are kept in such a way that they may be audited as required by law.



YOU SHOULD ALWAYS

- / ensure that when performing your duties, your actions are never in breach of any obligations applicable to the company and you.



YOU SHOULD NEVER

- / take part in a transaction based on knowingly inaccurate, misleading or incomplete information.



IS THIS ETHICAL?

Situation: you are responsible for a hotel's financial reporting. An expense about which you were not told was incurred during the current period and has not been include in your previous expenditure forecasts. Given that the expense is relatively small and a one-off, you have been asked to carry it forward to the next period. What should you do?

Solution: carrying forward expenses in this way is unethical. Accounting standards require your reporting to present a true and fair view of the period in question. The fact that this deferral is a «one-off» makes no difference. All expenses must be booked in the period in which they were incurred.



2.3.4 COMPANY ASSETS – MISUSE OF CORPORATE ASSETS

Accor’s assets are only to be applied to achieve the Group’s objectives. When placed at an employee’s disposal, they must only ever serve Accor’s interests, never the personal interests of an employee. Any employee misusing Accor’s assets will be subject to disciplinary sanctions and liable to criminal prosecution. The penalties vary from country to country.

Misuse of corporate assets involves deliberate use of the company’s assets, credit or the powers vested in its officers for private gain and not in the corporate interest of the company.

The concept of misusing corporate assets exists in numerous legal systems. Its definition and what constitutes misuse may vary from one country to another. In France, misuse of corporate assets is an offence exposing the offender to criminal prosecution.

Accor pledges to apply the strictest definition of misuse of corporate assets in every subsidiary and apply all necessary means to prevent and detect offences.



YOU SHOULD ALWAYS

- / keep in mind that all Group assets (even those of little value) and documents are the exclusive property of Accor.



YOU SHOULD NEVER

- / use Accor assets privately or in your personal capacity.



IS THIS ETHICAL?

Situation: you are a hotel manager and you regularly invite family members to dinner in the hotel restaurant. These expenses appear justified to you because of your position in the hotel. Is this acceptable?

Solution: absolutely not. Goods and services belonging to the company must never be put to your personal use, regardless of your justifications or position within the hotel. Such conduct is a criminal offence, is incompatible with our ethics and the example you are supposed to set for the employees under your management.



2.3.5 PERSONAL DATA PROTECTION

The protection of personal data (such as name, telephone number, email address, payment card number or customers preferences) requires information to be protected where a natural person may be directly or indirectly identified from such information and requires the conditions for the collection and processing of such data to be defined. Personal information is protected by a variety of laws and regulations governing the right to privacy in France, the

European Union (General Data Protection Regulation - GDPR) and in other regions of the world.

Accor has published a «**Personal Data Protection Charter**» available for consultation on its websites and intranet.



YOU SHOULD ALWAYS

- / use personal data only where:
 - you have the consent of the person (or data subject); or
 - such use is necessary to perform a contract to which the person (or data subject) is a party; or
 - this is a legal obligation; or
 - it is necessary to protect the life of this person; or
 - you have a legitimate interest in using the data and are not violating the individual's legal rights;
- / be able to explain why you need these person data;
- / use only the data that you really need; if you can achieve the same result with less data, you should do so;
- / tell people how you are using their data;
- / allow people to exercise their rights: access to their data, the right to rectify their data, have it erased or object to its use;
- / keep the data for a limited period only, in compliance with the applicable laws;
- / keep personal data secure (i.e. their integrity and confidentiality);
- / enter into a written agreement with any third parties needing to use or process the personal data, after satisfying yourself that they are capable of protecting that data;
- / for any transfer of data outside Europe, contact one of the Group's Data Privacy Officers who will help you circumscribe the transfer using the most suitable legal tools and resources;
- / report any data breach where the data are compromised (lost, stolen, damaged, not in serviceable condition,...) to the authorities and people concerned where the data breach presents a high level of risk for those individuals;
- / ensure compliance with the «**Personal Data Protection Charter**».



YOU SHOULD NEVER

- / collect so-called «sensitive» data (e.g. concerning state of health, ethnic origin, sexual orientation, political opinions, religious convictions ...) without the express consent of the person concerned or only if the law so requires;
- / access personal data or store them without the necessary authorities and consents or allow an unauthorised third party to access personal data;
- / use the data for end purposes other than those for which they were initially collected.





IS THIS ETHICAL?

Situation: in one of our host countries, an exceptionally powerful monsoon has caused serious flooding and left hundreds of thousands of people homeless. My wife is the head of the local office of an accredited French humanitarian NGO. I know that some of the hotel's regular guests are very upset about the catastrophe and would be willing to help the community. Can we use the customer database to contact them for donations?

Solution: this is a very generous idea but the laws governing the computer file use are very strict. A business computer file may only ever be used for a business purpose. You may, however, contact Group head office to explore the most effective way of assisting the victims.

2.3.6 INFORMATION SYSTEM SECURITY

Information system security involves managing informational risks at every level of the business: secure data access and dedicated sites, administrator access rights, training in informational risk awareness, partner system checking through specific security tests and audit procedures, etc.

Accor pledges:

- / to set up a dedicated information systems security body;
- / to define guidelines for the use of information systems across the company and maximising uptime for the most critical systems;
- / to provide regular training to those particularly involved with security issues;
- / to include security in IT application life cycle management;
- / to implement technological solutions designed to protect the personal data of guests and employees.



YOU SHOULD ALWAYS

- / ensure that you comply with information system user rules to protect system security.



YOU SHOULD NEVER

- / use information systems, email and the Internet inappropriately.



IS THIS ETHICAL?

Situation: I lost a flash drive containing data about the company that was neither password protected or encrypted when I was travelling. What should I do?

Solution: the loss of these data and their potential fraudulent use may well have serious legal consequences and cause damage to Accor. It is vital to comply scrupulously with the internal rules and procedures for the protection of the Group's information systems and the data they contain. You should inform your manager, Compliance Officer, Legal Department or Talent & Culture representative about the situation as soon as possible.



2.3.7 INTELLECTUAL PROPERTY

Intellectual property consists of rights in intangible assets such as trademarks, domains, designs, patents, know-how and copyright. Failure to observe and respect these rights will incur legal liability in cases of infringement or unfair competition.

Accor pledges:

- / to protect and defend its own intellectual property rights;
- / to ensure that the intellectual property rights of its employees and partners, and more widely third parties, are also respected.



YOU SHOULD ALWAYS

- / carry out proper checks and procure the necessary consents and clearances granting Accor the right to use resources belonging to third parties (photographs, films, articles, logos, trademarks etc.).



YOU SHOULD NEVER

- / use resources belonging to third parties (photographs, films, articles, logos, trademarks etc.) without valid, prior, written consent.



IS THIS ETHICAL?

Situation: I am organising a cocktail party for guests at the hotel. On the Internet, I found an amazing photograph to use as artwork for the cocktail menu. I printed the cocktail menus featuring this photograph and showing the Accor logo. What should I do?

Solution: despite it being freely available on the Internet, this does not mean that the photograph is not copyright protected. Using it on an Accor document may incur liability for the Group. Before using any photograph, you should therefore check with the Legal Department whether it can be lawfully copied for the intended use. If in doubt, do not use it without the express clearance of the rights holder.



2.3.8 PROTECTING OUR CORPORATE IMAGE AND REPUTATION

Rights of personality are the rights of individuals to control the use of their name, image, likeness, or other aspects of their private lives, and to protect their honour and reputation. Like individuals, companies have the right to protect their reputation and are entitled, where required to bring legal actions for defamation, denigration or disparagement.

Accor is very careful:

- / to apply for the express consent of any individual before using any photograph, video or other medium in which an employee or person from outside the Group can be identified, or featuring their name or any other attribute of their personality;
- / about what employees post on social networks on issues directly or indirectly concerning the Group, its brands, hotels or businesses to ensure that they do not disclose information that is confidential and/or potentially damaging to our reputation. The Group's **Social Media Charter** defines guidelines that employees are expected to follow in posting on social networks.



YOU SHOULD ALWAYS

- / think about the interests, image and reputation of Accor before acting;
- / ensure that your personal opinions or interests cannot be confused or mistaken for those of Accor;
- / be aware that nothing on the Internet is «secret», «temporary» or «private»;
- / comply with the directives and guidelines in the «**Social Media Charter**».



YOU SHOULD NEVER

- / express yourself or make commitments in the name, or with the name, of Accor without specific authorisation to do so;
- / use the Accor email address, headed paper or named documents in connection with your personal affairs or opinions.



IS THIS ETHICAL?

Situation: I am a regular follower of a tourism blog and I have seen negative feedback about Group hotels on this blog. As an Accor employee, can you give your opinion on this blog?

Solution: you cannot post anything on the blog referring directly or indirectly to the fact that you work for Accor. In such a situation, you should inform the Group's Press Relations Department, they will know how to handle the matter. Under no circumstances, should you express yourself on behalf of the Group unless specifically authorised to do so.



2.4 RESPECTING OUR PARTNERS

2.4.1 SHAREHOLDERS AND INVESTORS

In addition to the meetings organised when our annual results are published and the annual general meeting of the shareholders, Accor's aim is to communicate with our shareholders and members of the business and financial community as responsively and as transparently as possible. This regular communication process tends to focus on institutional equity investors, financial analysts and financial market regulators.

Accor pledges:

- / to create a relationship of trust with the market by acting as a source of reliable, meaningful investor information;
- / to nurture dialogue with individual shareholders through an Individual Shareholders Consultative Committee and a Shareholders Club;
- / to organise events and hotel visits to enable institutional investors to meet with line managers and achieve a better understanding of Group management practices and processes.

2.4.2 SUPPLIERS AND SERVICE PROVIDERS

Accor pays careful attention to instilling its sustainable development commitments across the entire supply chain, in particular through its «**Procurement Charter**» that shares our employee relations, social responsibility and environmental commitments with suppliers. A supplier's failure to comply with any of the principles it contains may result in the termination of business dealings with that supplier..



YOU SHOULD ALWAYS

- / verify that suppliers have signed **Procurement Charter** and that their subcontractors comply with the same standards. Suppliers also have to agree to participate in the sustainable development performance review and authorise Accor to carry out audits;
- / ensure that where a supplier is unable to comply with some of the requirements of **Procurement Charter**, it has notified Accor so that an agreement can be reached on the corrective and preventive measures to be taken and the time scale for implementing them.
- / apply the **Know Your Counterparty (KYC)** procedure during a call for tenders, in accordance with the rules defined by the Compliance Department. For any specificities, please contact your Compliance Officer.



YOU SHOULD NEVER

- / allow a situation where a supplier is in breach of its obligations under **Procurement Charter** to persist.





IS THIS RESPONSIBLE?

Situation: your supplier of cleaning products, which has performed well and satisfied all of its obligations in the places in Europe where it does business, has a manufacturing plant in China. You learn that there are no fire extinguishers at this facility. What should you do?

Solution: you should liaise with your contact at this supplier, explain the situation and draw up a corrective action plan in consultation with him. Under this plan, the supplier will undertake to equip its factory with fire extinguishers within three months. You should organise an on-site audit at an interim date to verify that the supplier has started the compliance process then, at the end of the given compliance period, prepare to think up alternative solutions should the supplier fail to fulfil its obligations.

2.4.3 SUSTAINABLE BUSINESS RELATIONSHIPS

Accor is committed to prioritising responsible, sustainable relationships with its suppliers and to dedicating part of its sourcing and procurement to small and medium-sized companies.

In France, around 60 % of certified or listed suppliers have been under contract for at least five years. Similarly, nearly three quarters (72 %) of suppliers are very small, small or medium-sized companies.



YOU SHOULD ALWAYS

- / be careful to maintain the quality of our relationships with our suppliers and take the particularities specific to small and medium-sized businesses into consideration;
- / be aware that commitment to small and medium-sized suppliers contributes to increasing and protecting local jobs.



YOU SHOULD NEVER

- / neglect to verify that suppliers are being careful to preserve their responsible and sustainable dealings with Accor;
- / neglect to set aside a significant part of sourcing and procurement for small and medium-sized companies.



3

Our commitments as a responsible employer

3.1 RESPECTING WORKING CONDITIONS

3.2 RESPECTING CAREERS



3.1 RESPECTING WORKING CONDITIONS

3.1.1 SOCIAL DIALOGUE

Social dialogue is at the heart of preserving harmony among members of the corporate community. It helps to build ongoing consensus, playing an essential role in defusing labour unrest.

Encouraging dialogue brings management closer to all the Group's employees and thus gives everyone an opportunity to express their opinion.

Our dialogue policies are implemented by managers, who foster an exchange of ideas with employees, in particular by organising round-tables and other dedicated dialogue events.

To support hands-on management, Accor has deployed objective, high value-added measurement tools, such as opinion surveys and video clips, to evaluate the workplace environment and take corrective action where there is dissatisfaction.

Accor pledges to ensure the transparency of employee communication by:

- / conducting an annual performance review systematically with every employee;
- / keeping each employee clearly informed of their rights, duties and benefits;
- / publishing information media adapted to the local environment, for instance, by translating internal documents;
- / understanding the impact of change on people when undertaking reorganisation or restructuring projects.



YOU SHOULD ALWAYS

- / encourage and develop every form of social dialogue, an essential tool for the smooth running of the company.



YOU SHOULD NEVER

- / consider that social dialogue is unhelpful or futile, adopting an inward-looking attitude or closing yourself off from others.



IS THIS ETHICAL?

Situation: I decide to change employee working hours, requiring them to work 48 hours straight.

Solution: although you are entitled to alter working hours, this requires consultation, and even negotiation, with employees or their representative trade union bodies, and compliance with the mandatory rest period applicable in the country in question.



3.1.2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Freedom of association and the right to collective bargaining enable employees to find and join organisations of their own choosing with the aim of collectively defending their interests in the company.

Accor pledges:

- / to ensure compliance with locally applicable legislation governing the freedom of association of its employees;
- / to encourage all forms of collective employee expression in our company;
- / not to prohibit or obstruct any process of founding an internal employee representative body;
- / to respect the timetable for consulting stakeholders and employee representatives, particularly in the case of reorganisations or disciplinary procedures;
- / to ensure that employees can express themselves freely within the company on issues to do with their working conditions.



YOU SHOULD ALWAYS

- / ensure strict compliance with the timescale for consulting stakeholders and employee representatives;
- / satisfy yourself that your employees are able to express themselves freely within the company on issues to do with their working conditions.



YOU SHOULD NEVER

- / prohibit or obstruct any process for founding an internal employee representative body.



IS THIS ETHICAL?

Situation: an employee informs me that she has been elected to office in a trade union. Outraged that she did not speak to me about it beforehand, I am considering taking retaliatory action against her.

Solution: reprisals against any employee by reason of his or her involvement in trade union business are strictly prohibited and constitute serious discrimination punishable under the criminal law for which you, and potentially Accor, may be liable. If you would like information about such issues, you should speak to your manager or supervisor, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative.



3.1.3 COMBATING ALL FORMS OF HARASSMENT AND BULLYING

Bullying (or «moral harassment») is characterised by repeated, hostile conduct, spoken remarks or comments and actions that impugn an employee's dignity and integrity. Any behaviour or action in breach of every individual's right to respect and human dignity is unacceptable.

Sexual harassment is defined as repeatedly subjecting a person, regardless of their gender, to remarks or behaviour of with a sexual connotation that impugn their dignity because they are degrading or humiliating, or which create a situation that is intimidating, hostile or offensive to them. Any form of pressure, even without repetition, where the actual or apparent aim of such pressure is to procure performance of an act of a sexual nature on the harasser or a third party also constitutes sexual harassment.

This behaviour may consist of unwelcome or inappropriate physical contact, emails, looks

or gestures, remarks, comments, invitations or solicitations of a sexual nature, however they are expressed, or sending or showing items of a sexual nature (documents, images, objects, etc.). The aim of such behaviour may also be to make a promotion or another advantage conditional, as a quid pro quo, upon performing a sexual act.

An employee may be sexually harassed inside or outside Accor premises by another Group employee, guest, supplier or partner.

Accor will not tolerate any form sexual harassment or bullying. Each employee is expected to alert the Talent & Culture Department which will be ready to deploy the resources needed to stop any reported cases of sexual harassment or bullying.



YOU SHOULD ALWAYS

- / be respectful of your colleagues;
- / refrain from any form of harassment whether in-house or towards guests, suppliers or partners of the Group;
- / immediately report any instance of sexual harassment or bullying that may come to your attention to your manager or supervisor, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative.



YOU SHOULD NEVER

- / speak or behave in a way that is hurtful, upsetting, offensive or likely to constitute bullying (moral harassment) towards any of your colleagues, a suppliers or partners;
- / continue to speak or behave in a way that you have been told is unwanted or inappropriate;
- / disregard or keep quiet about any instance of harassment or bullying that you know about, irrespective of who is doing the harassment.



IS THIS ETHICAL?

Situation: one of my female colleagues confided to me that she feels harassed by her manager. However, she has a strong personality and I believe that she has the authority and wherewithal to defend herself. Should I get involved anyway?

Solution: yes, unquestionably. Harassment can cause distress and make even someone in authority or with an authoritative presence feel vulnerable. You should, immediately, alert your manager, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative, who will do what is required. You can also report the matter using the Accor Whistleblowing Hotline.



3.1.4 WORK / LIFE BALANCE

Enabling employees to achieve a harmonious balance between their work and their personal lives is a highly effective way of reducing psychosocial stress by improving employee well-being, their quality of life at work and, with it, the quality of their work.

Accor pledges:

- / to respect important life events, such as births, weddings, holidays or the death of loved ones, etc.);
- / to reduce the impact of unforeseen circumstances on short-term work schedules, to ease the pressures and stresses of a hotel's atypical working hours (by distributing schedules ahead of time and by planning set and rotating schedules to allocate time-off equitably, etc.);
- / where the job permits, to offer a workable solution to employees suffering commuting difficulties.



YOU SHOULD ALWAYS

- / endeavour to protect the well-being and quality of life of your employees at work because doing so is conducive to high quality performance at work.



YOU SHOULD NEVER

- / underestimate or consider difficulties at work to be unimportant: they are a source of potential psychosocial stress or a decline in well-being in the workplace.



IS THIS ETHICAL?

Situation: you learn that a member of your management team is working at home after hours on a regular basis despite having done a full day at work. Although you are satisfied with his work, he has recently been showing signs of stress and has been distant, dissociating himself from his teams. What should you do?

Solution: this may be a case where allowing work to spill over into his private life may disrupt this employee's equilibrium, exposing him to psychosocial stress and a decline in well-being at work that may also adversely affect his teams. You should never hold back in dealing with this type of situation. You should report it your manager or supervisor, Legal Department or Talent & Culture representative.



3.1.5 RELATIONSHIPS WITH SERVICE PROVIDERS AND SUBCONTRACTORS

Accor pledges:

- / to respect the rights of workers in general and ensure that there is no breach of such rights by its service providers and suppliers; and
- / in particular, not to resort to using manpower supplied by third parties other than in circumstances allowed by law.



YOU SHOULD ALWAYS

- / ensure that your employees rights are respected and satisfy yourself that Accor service providers and suppliers are mirroring this attitude and approach in their contractual relationships with the Group.
- / seek an undertaking from service providers and subcontractors, when establishing a special relationship with them, that they will apply all health and safety rules and human rights as regards our own employees and their own employees. No health and safety at work or human rights differences can be permitted between employees working for the Accor brands.



YOU SHOULD NEVER

- / disregard or keep quiet about any situation where Accor service providers or suppliers are in breach of these rules.



IS THIS ETHICAL?

Situation: a guest work seminar is starting tomorrow at your hotel. A number of your employees are absent, meaning that you do not have enough staff to clean the rooms. You decide, in this emergency, to employ the services of a company providing its own workers to help out in this difficult period. Your payment to this company includes a mark-up on normal prices for this service provider reflecting the urgency of the services required. What do you do?

Solution: in France, «hiring out» labour is a criminal offence because this company is assisting you with a view to making a profit despite not being a temporary employment agency. It is not therefore entitled, under any circumstances, to hire out temporary workers.



3.1.6 HEALTH, SAFETY AND WORKING CONDITIONS

All Accor employees have the right to a safe working environment. Maintaining a healthy workplace is primarily the responsibility of local managers who manage risks, record and respond to incidents and implement suitable action plans, as needed.

Analyses must be carried out upstream to anticipate and reduce the short and long-term risks associated with each job or activity. Physical stresses and strains should be avoided and suitable training offered whenever possible.

Accor pledges:

- / to identify and assess the short and long-term risks associated with each job, activity, department or workstation;
- / to offer suitable training and provide resources to reduce the number of workplace accidents and cases of occupational and other illnesses (including training in healthfulness and well-being, covering areas such as HIV-AIDS prevention, chronic diseases, nutrition, psychosocial risks and first aid);
- / to anticipate and manage the human impact of changes in working conditions;
- / to consider psychosocial risks and apply suitable methods to manage them.



YOU SHOULD ALWAYS

- / comply with safety regulations and directives and take all reasonable and necessary precautions to maintain a safe and healthy working environment;
- / satisfy yourself that your actions do not create risks for others;
- / report any situation likely to compromise the safety of your working environment, your health, safety or working conditions at your work location to your manager, Legal Department or Talent & Culture representative.



YOU SHOULD NEVER

- / disregard Accor regulations on health, safety and working conditions.



IS THIS ETHICAL?

Situation: my manager asked me, exceptionally, to deactivate a safety system. What should I do?

Solution: you should never bypass, disconnect or deactivate any safety system, mechanism, feature or surveillance equipment without the appropriate, prior authority of a safety and security representative. If your manager insists, you should refuse and immediately inform your Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative.



3.2 RESPECTING CAREERS

3.2.1 NON-DISCRIMINATORY, TRANSPARENT RECRUITMENT POLICIES

The very structure of Accor's businesses means that the hiring process is completely decentralised. It is therefore essential for the employees in charge of this managerial process to embrace the Group's professional standards and method guidelines. These rules are applied prior to recruitment and hiring, enhancing efficiency while guaranteeing fairness in compliance with current legislation.

Any candidate selection based on non-professional criteria (such as religion, age, gender, sexual orientation, disability, political opinions, ethnic origin, union membership,...) is prohibited, subject only to local regulations in a limited number of countries which require us to apply other specific criteria when recruiting.

Sensitivity training is essential if we want to

reduce the stereotyping that fuels discrimination. The working environment, our past experience and our subconscious expectations can influence the way we feel about candidates and the questions we ask them.

Accor pledges:

- / to comply with a selection process, applying the same criteria to every applicant for a given position;
- / to base all recruitment decisions exclusively on professional skills and personal qualities, in line with our needs and the applicant's own attributes.



YOU SHOULD ALWAYS

- / ask questions that cannot be perceived as involving a direct risk of discrimination, for example:
 - how many years of experience do you have in this position?
 - how many years of experience do you have in a similar job?
 - what skills and expertise did you acquire through your previous job experience that could be useful in this new position?



YOU SHOULD NEVER

- / ask questions that might be perceived as involving a direct risk of discrimination, for example:
 - how old are you?
 - when were you born?
 - we have a very young team. Do you think that you could fit in?



IS THIS ETHICAL?

Situation: after meeting several prospective candidates, I overhear the colleague responsible for candidates selection making negative remarks discretely to another colleague about a prospective supplier based on his supposed religion. It is reasonable for me to believe that this assessment has resulted in this candidate being ruled out. What should I do?

Solution: selecting or not selecting a candidate based on religion or another such criteria is strictly prohibited. The employee making such a decision, and Accor may be liable to severe penalties and sanctions. You should immediately inform your manager, Legal Department or Talent & Culture representative. You can also report the matter using the Group's Whistleblowing Hotline.



3.2.2 VALUING AND RESPECTING DIVERSITY AND INCLUSION

For a company, diversity means the variety of individual backgrounds found among its employees (including but not limited to factors such as country, region or neighbourhood of origin, family name, culture, age, gender, physical appearance, disability, sexual orientation, education and others).

When applied to management, this translates into an inclusive approach to recognition and the celebration of individual differences as a real and valuable source of higher performance for the company.

In terms of organisation, diversity influences all of the procedures and processes implemented by the company to ensure equal opportunity and prevent discrimination. Resources have been deployed to support our **Diversity & Inclusion Commitment** (downloadable from the Group intranet).

More than commitments and resources, however, respect for diversity is primarily a personal issue. It is up to each of us to improve our practices, driving superior performance for the entire organisation.



YOU SHOULD ALWAYS

- / implement Accor's diversity pledges and commitments, especially in terms of its Human Resources, Marketing and Procurement policies;
- / satisfy yourself that our guests, customers, suppliers and partners are familiar with Accor diversity and inclusion policy.



YOU SHOULD NEVER

- / discriminate when recruiting, making decisions about working conditions, in relationships with suppliers, partners and other third parties, by reason of gender, disability, family circumstances, sexual orientation, age, political or philosophical opinions, religious convictions, trade union activities, ethnic, social, cultural or national origins.



IS THIS ETHICAL?

Situation: one of my colleagues has been jokingly commenting on the nationality and ethnic origin of a member of his team. What should you do?

Solution: any discrimination, including where the tone is supposed to be humorous, has no place at Accor. Everyone is entitled to respect. Such behaviour may have consequences for the person suffering it without the maker of the remarks ever knowing. In such a situation, you should immediately inform your manager, Ethics and CSR Officer, Compliance Officer, Legal Department or Talent & Culture representative. You can also report any discrimination using the Group's Whistleblowing Hotline.



3.2.3 REWARDING PERFORMANCE

Performance is driven, for individual employees, by a sense of involvement and commitment and, for teams, by solidarity around a shared objective. In both cases, it is monetised according to the criteria for determining variable pay.

Accor pledges:

- / to offer remuneration that is competitive in each market and country;
- / to compensate employees fairly and motivationally in reward for their personal and team performance.

3.2.4 TRAINING AND CAREER SUPPORT

Everyone at Accor is pursuing a life-long quest for career development and meaningful experience. Everyone feels valued and free to pursue their own objectives. Accor pledges to ensure that career development experience focuses on learning, available to all, anywhere and at any time.

Accor provides added value to its employees' career development, not only for the future of the company but equally so that its employees are equipped to adapt to a constantly changing world.

Accor pledges:

- / to maximise individualised experiences: we adapt and customise our learning opportunities to our employees. We develop and enhance programmes, tailoring them to suit our employees, their needs and how they may change;
- / to globalise the transformation in education and training: at Accor, you can learn wherever you want, whenever you want. The digitalisation of learning provides every employee with the opportunity of receiving education and training at a distance;
- / to energise group learning: every individual is a source of learning and each individual experience provides learning content. We believe that a dual or shared creative approach drives learning forward. Every employee can contribute to the learning community by sharing experiences, expertise and know-how.



YOU SHOULD ALWAYS

- / encourage and motivate your teams, helping each employee to give of their best by instilling pride in a job well done, offering opportunities for promotion in-house and providing all the educational and training tools necessary for their career development.



YOU SHOULD NEVER

- / lose sight of the fact that every employee should be given the chance to grow at Accor.



4

Our commitments as a company invested in the community and the planet

4.1 RESPECTING THE ENVIRONMENT

4.2 RESPECTING LOCAL COMMUNITIES AND SOCIETY



4.1 RESPECTING THE ENVIRONMENT

As a responsible company, we are expanding our businesses with due respect for the planet by reducing our environmental footprint. Our global presence provides us with the opportunity to guide our various businesses towards more environmentally sensitive and sustainable solutions.

4.1.1 ENVIRONMENTAL MANAGEMENT

Our environmental strategy is based on a Group-wide environmental footprint study and supported by a management system designed to address the main environmental challenges facing Accor, in terms of both constructing hotels and operating them.

Accor pledges:

- / to define Group-wide environmental performance improvement objectives, roll them out and track progress towards achieving them using appropriate indicators and environmental management and control systems;
- / to introduce disciplined environmental management processes by deploying sustainable construction and refurbishment guidelines for new hotel projects.



YOU SHOULD ALWAYS

- / comply with Group and brand standards, in particular the mandatory «Bronze» actions provided for in our environment policy.



YOU SHOULD NEVER

- / conceal the current and future effects of the environmental footprint of your business activities and construction projects.



IS THIS RESPONSIBLE?

Situation: an owner approaches Accor to franchise its hotel despite the fact that there are numerous environmental failings and shortcomings in its running and management (no waste management, routine usage of single use plastic products, etc.). Is such a proposal acceptable?

Solution: no, the sustainability of the model and its compliance with Accor standards first need to be assessed.



4.1.2 RAISING GUEST AWARENESS AND EMPLOYEE TRAINING

Raising everyday awareness and sensitivity to environmental issues is a core component of environmental stewardship. We need to educate our guests in ways that encourage them to support hotel programs. As the cornerstone of our sustainable development policies, employees are expected to act as ambassadors by setting an example by respecting the environment every day and promoting our actions.

Accor pledges to engage in ongoing training and in raising the awareness and sensitivity of its employees and guests:

- / by developing and rolling out training and awareness building resources for employees;
- / by installing signage in hotels and on its Internet applications to educate guests and raise their sensitivity.



YOU SHOULD ALWAYS

- / behave like Accor ambassadors by proving yourselves daily to be model protectors of the environment and by promoting the Group's environmental endeavours in-house and to our guests;
- / report malfunctions and failings that create a negative environment footprint.



YOU SHOULD NEVER

- / disregard Group environmental protection rules.



IS THIS RESPONSIBLE?

Situation: you are in charge of the activities and experiences offered to guests in a hotel located near a nature reserve. The hotel sales manager puts forward a plan to offer some guests excursions into reserve to go hunting. What should you do?

Solution: you should never suggest illegal activities to guests and should always check that the experiences you offer comply with Group rules. If your manager insists, you should decline and immediately inform your Ethics and CSR Officer, Compliance Officer, Legal Department, the host country's Sustainable Development Officer or you can alert Accor via the Group's Whistleblowing Hotline at www.accor-integrity.com.



4.1.3 CONSERVING NATURAL RESOURCES

ENERGY AND CARBON FOOTPRINT

The tourism industry is particularly exposed to the effects of climate change. In addition to representing a major cost, hotel energy consumption ranks high among the Group's leading environmental impacts. Accor has expressed its willingness to redefine its carbon trajectory to bring it into line with the global warming limitation objectives set out in the Paris Agreement.

Accor pledges:

- / to control and contain hotel energy use and reduce the related carbon emissions by routinely tracking energy performance and implementing energy saving action plans;
- / to promote renewable energies by installing such facilities wherever feasible in new or refurbished hotels, depending on regional suitability, and by helping to identify technologies capable of reducing our energy and climate footprint;
- / to reduce the value chain carbon footprint, particularly as regards food.

WATER

The Group's direct water use is very significant and may sometimes represent a burden in water-stressed regions. As a result, conserving water is of major concern to Accor, especially when indirect use, caused further up the chain by the water needs of agricultural production, is taken into account.

Accor pledges:

- / to conserve water resources by regularly tracking use, rolling out water-saving programs and equipment, particularly in water-stressed regions;
- / to promote agro-ecology and offer direct assistance to farmers in adopting more environmentally friendly growing and production techniques.

POLLUTION AND DISCHARGES

Accor's operations may result in direct and indirect pollution. The quality of air or groundwater may be impacted by the organic matter, particles or chemicals released in hotel discharges. Managing our operations may also occasionally give rise to noise, unsightliness, odours and other disamenities.

Accor pledges:

- / to manage the impact of its waste water effluent:
 - by guaranteeing that wastewater from all its hotels is systematically treated;
 - by prioritising the use of eco-label products (for cleaning, maintenance, gardening...) which limit the chemical content in effluent and other discharges;
 - by preferring environmentally friendly suppliers, in particular of laundry services.
- / to implement environmentally sensitive practices to limit all forms of nuisance (noise, unsightliness, odours) or air pollution.

BIODIVERSITY

The tourism industry is a particular source of biodiversity damage, whether as a result of contributory upstream agriculture (food farming, fishing), guest activities (visits to sensitive natural ecosystems) or due to where its hotels are located.

Accor pledges:

- / to integrate hotels and other forms of accommodation into their ecosystem by designing the preservation of biodiversity into every new project, and in terms of building location;
- / to promote programs to protect biodiversity in each hotel or other forms of accommodation, its ecosystem and its supply chain.



WASTE, FOOD WASTE AND RECYCLING

The waste produced by our hotels comes from foodstuffs, complimentary products and other operating inputs, and from guest activities. A significant volume of waste is also generated by hotel construction or refurbishment projects.

Accor pledges:

- / to ensure the correct treatment of waste produced by the hotel in the appropriate channels, duly approved by the local authorities, especially when dealing with hazardous waste;
- / to reduce the quantity of raw materials used by limiting packaging and other disposable items, and prioritising recycled and/or recyclable materials, in particular when it comes to plastics;
- / fight against food waste in our hotels by deploying solutions adapted to the typology of each restaurant
- / to increase the proportion of sorted and recycled hotel waste by setting up or operating treatment and processing procedures for the main categories of waste produced by our operations, particularly, by opting for selective collection, reuse, recycling, or composting for bio-waste.



YOU SHOULD ALWAYS

- / report malfunctions and failings creating a negative environmental footprint on natural resources;
- / respect the commitments made in the **Sustainable and Healthy Food Charter**;
- / raise employee awareness to green gestures in their trades and professions;
- / endeavour to control the use of natural resources in the building and running of hotels by prioritising more sustainable solutions (renewable forms of energy, waste sorting processes and networks, the use of green products, etc.);
- / carry out regular monitoring of water and energy use.



YOU SHOULD NEVER

- / cause or allow a situation of non-compliance with the Group's environmental objectives to persist;
- / include endangered species in menus



IS THIS RESPONSIBLE?

Situation: a guest asks me to serve shark fin at a banquet that he is organising at a Group hotel. Should I agree to his request?

Solution: no, you cannot accede to your guest's request. Sharks are on the list of fish species banned from sale by Accor. You can explain the Group's position to your guest and encourage him to choose another dish.



4.2 RESPECTING LOCAL COMMUNITIES AND SOCIETY

4.2.1 HEALTH AND NUTRITION

Food and nutrition are major challenges for Accor because nutrition is currently the focus of public health campaigns to reduce the risk of illnesses such as cancer, cardiovascular disease, diabetes and obesity and other health problems. Also, some diets can have very significant environmental impacts (such as high meat consumption).

Accor pledges to promote a healthy and sustainable diet:

- / by developing resources and solutions to create responsible menus based on balanced nutrition, organic products, etc.;
- / by providing our guests and employees with clear information and enabling them to eat balanced dishes at our hotel restaurants.



YOU SHOULD ALWAYS

- / ensure that the food we offer is balanced and varied;
- / ensure there is a vegetarian option in the dishes that we offer in hotels and restaurants.



YOU SHOULD NEVER

- / disregard Charter recommendations for a healthy and sustainable diet



IS THIS RESPONSIBLE?

Situation: you are a restaurant chef; you decide on a change of menu aiming to promote local, meat-based specialities. This will offer you a way of using up your meat stocks. Is it responsible to have only these dishes on your menu?

Solution: no, regardless of your available supplies inventory and/or changes you would like to make to the menu, it is essential to provide for a vegetarian option in the menu.



4.2.2 RESPONSIBLE MARKETING AND COMMUNICATION

Responsible communication practices should be built into advertising initiatives to ensure that the services, relationships and solutions are transparently presented and that guests are protected from misleading information.

These practices cover all forms of communication to avoid any accusation of «greenwashing»⁵.

Back in 2009, Accor signed the **Responsible Communications Charter**. This charter was revised and consolidated to become the FAIRe programme in 2018. Accor is a signatory to this programme, launched by the *Union des Marques* (Brand Union) and devised in consultation with stakeholders from a broad range of fields.

Accor pledges:

- / to make sure that all communication campaigns are responsible by defining a validation procedure for commercials or communications before they are issued or distributed, including environment footprint among the selection criteria for choosing media and organising events;
- / to be transparent in its actions and communication, guaranteeing guests price transparency.



YOU SHOULD ALWAYS

- / demonstrate transparency in actions and communications, guaranteeing guests price transparency;
- / resist and discourage any form of stereotyping or sexism in our communication campaigns.



YOU SHOULD NEVER

- / exploit any lack of knowledge or experience on the part of our guests;
- / communicate on corporate social responsibility initiatives that have not yet been actioned or rolled out.



IS THIS RESPONSIBLE?

Situation: you are the general manager of a hotel planning to set up a plastic use reduction initiative. Ahead of the launch of this initiative, your teams have prepared a communication campaign on the benefits of eliminating plastics. What should you do?

Solution: you may only communicate on plans, schemes and initiatives that have already been rolled out.

^{5/} Practice giving the perception that a company is more environmentally responsible than it actually is.



4.2.3 SPONSORSHIP

Accor has been expanding its sponsorship initiatives in areas such as sport, entertainment, music, fine cuisine and literature. Accor does not sponsor or put its name to activities that are inconsistent with our fundamental values, particularly those involving violence or any failure to respect fundamental non-discrimination and diversity principles.

These initiatives need:

- / to satisfy the same requirements as all our communication initiatives: product, service and relationship transparency, and customer protection;
- / to fit well with a strategy of responsible communication aimed at avoiding excesses and departures from honest advertising practice, such as greenwashing.

Accor pledges:

- / to ensure that all sponsorship initiatives are responsible by defining a validation procedure for such initiatives before they are rolled out, and including anti-bribery, corruption, trading in influence and environment footprint among the criteria for selecting such initiatives;
- / to be transparent in its actions and communications;
- / to involve its employees and guests, as much as possible, in its sponsorship initiatives, for instance by allocating tickets from its various partnerships;
- / to endeavour to provide all types of audience with a maximum number of experiences, while working to defend diversity, representativeness and non-discrimination;
- / to ensure that its sponsorship initiatives, especially those involving ticket allocation systems that require guest or prospective guest personal data processing, comply with our Personal Data Protection Charter.



YOU SHOULD ALWAYS

- / apply the **Know Your Counterparty (KYC)** procedure to ascertain who the ultimate beneficiaries of the sponsoring initiatives may be;
- / share the principles, standards and commitments of our Ethics and CSR Charter with Accor partners;
- / ensure that our partners use their best endeavours to respect the principles, standards and commitments of our Ethics and CSR Charter;
- / pay particular attention to issues or problem situations involving bribery, corruption and influence peddling, doping or other forms of conduct that are contrary to our fundamental values.



YOU SHOULD NEVER

- / allow a situation in which a partner is failing to honour or perform its duties under our Ethics and CSR Charter to persist, with particular regard for Accor's Anti-Bribery, Corruption & Trading in Influence Policy;
- / process the personal data of our guests or prospective guests without complying with our Personal Data Protection Charter;
- / use the tickets allocated to Accor from its various partnerships outside its partnerships.





IS THIS RESPONSIBLE?

Situation: one of our music business partners is failing to comply with the essential tenets of our Ethics and CSR Charter and is doing nothing to combat harassment and bullying.

Solution: you should warn the partner in question and encourage it to change its behaviour according to a mutually-defined timetable, making sure that it really does so.

Situation: A public official, owner of a sport club, asks an Accor employee to sponsor his club in exchange for a facilitated access to the local market.

Solution: You must refuse this offer as it constitutes an act of corruption.

4.2.4 LOCAL DEVELOPMENT

Firmly rooted in its local communities, Accor contributes to their economic development through direct and indirect jobs and protects their most precious, most vulnerable assets, including their children, cultural heritage and natural ecosystems.

Accor pledges:

- / to encourage the recruitment of local hotel staff;
- / to offer training programmes to develop the skills and employability of local employees who have not initially been prepared for our jobs;

- / to promote the culture, architectural heritage and cuisine of our host communities;
- / to help in the fight against poverty through our business agreements, for example by offering fair trade products whenever possible;
- / to encourage hotels to purchase and promote local products;
- / to support partnerships and ties with the local communities.



YOU SHOULD ALWAYS

- / keep in mind that that the particularities of the local environment are a source of richness and diversity that help to promote Accor's responsible commitments in host countries.



YOU SHOULD NEVER

- / believe that local particularities or customs are an excuse for not respecting Accor values and commitments, as expressed in the Ethics and CSR Charter.



4.2.5 SOLIDARITY AND LOCAL OUTREACH

Accor breathes life into «hospitality of the heart» by supporting public interest projects led by its employees in every host country where the Group does business.

Accor pledges, particularly through its Accor Solidarity Endowment Fund, to combat the social exclusion of those most in need through training and job placement, providing support for the development of individuals and their integration into their community by:

- / encouraging employees to get involved in community outreach initiatives;
- / supporting NGOs or local charities helping victims of a breakdown in the social bond, individuals living in precarious conditions or victims of natural disasters;
- / encouraging the empowerment of such people by rolling out project models that are economically viable over the medium term.



YOU SHOULD ALWAYS

- / apply the Know Your Counterparty (KYC) procedure to ascertain who the ultimate beneficiaries of projects supported by Solidarity Accor may be;
- / be conscious that, in addition to its economic presence, Accor contributes towards making better lives for local populations through its responsible commitment;
- / ensure that donations made by Solidarity Accor are used in accordance with the stated purpose of the solidarity or local outreach initiative.



YOU SHOULD NEVER

- / forget that, as an Accor ambassador, you embody Group image to the people and communities concerned by these projects and initiatives;
- / forget that the work of the public interest organisations you are supporting should, under no circumstances, serve your personal interests or those of your hotel, or Accor's interests in general.



IS THIS RESPONSIBLE?

Situation: I have been asked to support a charity helping young people in a deprived neighbourhood in consideration of the grant of an alcoholic drinks licence (a public official is a member of licensing committee at City Hall).

Solution: I should refuse categorically to submit the project to Accor Solidarity. The public interest and the interest of charity beneficiaries must not be associated with a benefit to the company or its employees. Such a situation could well be considered corrupt.



4.2.6 POLITICAL ACTIVITIES AND RESPONSIBLE LOBBYING

Accor does not support any political party in any host country.

Employees who take part in political activities do so solely in their private capacity, on their own time, and never as representatives of Accor. They must take appropriate steps to avoid any conflict of interest between their political involvement and their duties at Accor.

Lobbying is a constructive and transparent contribution to the political process designed to assist policy makers in shaping public policy on issues impacting Group business activities. This contribution is intended to enrich the thought processes of policy makers. The Group's involvement in this aspect of the political process complies with the current laws and regulations governing lobbying in each host country and with the bribery, corruption and trading in influence prevention rules.

Generally, the Group's lobbying activities are conducted in line with our strategic action principles, sustainable development and corporate social responsibility policies.

Accor pledges:

- / to express its position on issues of public interest impacting its business activities to public authorities in its own name or as a member of trade associations;
- / to act in the defence of its legitimate interests, taking care to ascertain the validity of its arguments;
- / not to seek undue political, administrative or regulatory advantage;
- / to show integrity and intellectual honesty in all relationships with public officials and organisations, regardless of the circumstances or interests it is defending.



YOU SHOULD ALWAYS

- / keep in mind that you are an Accor ambassador; you should therefore give due consideration to the Group you represent in your actions regarding stakeholders, showing absolute integrity and intellectual honesty.



YOU SHOULD NEVER

- / reveal your political opinions or involvement at work. They are personal to you and do not concern your colleagues, our guests, or our partners and suppliers. The workplace is not a suitable environment for discussing politics.



IS THIS RESPONSIBLE?

Situation: I am standing at a local election and think that it may be useful to say that I work for Accor for voters to get to know me.

Solution: this is inappropriate. Connecting Accor's name with your personal undertakings could be perceived as implied Group support for your political activism, which is clearly unacceptable.



5

Keyword glossary



KEYWORD GLOSSARY

Access	13, 26, 30, 31, 54
Association(s)	8, 56
Behaviour	3, 4, 5, 11, 13, 14, 39, 53
Biodiversity	49
Bribery, Corruption	2, 5, 17, 18, 19, 20, 22, 23, 53, 54, 55, 56
Careers	36, 43, 45
Charity(ies)	55
Childhood	12
Child labour	9
Child(ren)	9, 10, 12, 20, 29, 54
Communication	25, 37, 52, 53
Competition	24, 25, 32
Conduct	4, 6, 12, 33, 42, 49
Conflict(s) of interest	26, 27, 56
Crime	11, 17, 23, 26, 29
Collective bargaining	38
Community(ies)	2, 3, 7, 17, 51, 54
Development	2, 9, 34, 35, 45, 48, 54, 55, 56
Dialogue	34, 37
Disability	13, 43, 44
Discrimination	13, 38, 43, 44, 53
Diversity	4, 5, 7, 13, 44, 53, 54
Environment	14, 34, 42, 43, 47, 48, 49, 50, 51, 52, 53
Food	49, 50, 51
Forced labour	9
Fraud	23, 28
Freedom of association	38
General Data Protection Regulation (GDPR)	26, 30, 31, 53
Gifts	22
Harassment, Bullying	39, 54
Health	30, 41, 42, 51,
Hospitality	2, 6, 7, 55
Hygiene	14
Image	3, 5, 12, 14, 21, 33, 39, 52, 55
Information systems	31
Inclusion	44
Innovation	7
Integrity	2, 4, 30, 39, 56
Intellectual property	32
Investors	34
Invitation(s)	20, 22, 39
KYC (Know Your Counterparty)	23, 34, 53, 55
Lobbying	56
Local outreach	55



Misuse of corporate assets	29
Mobility	3, 26, 30, 31, 45, 54
Money laundering	23
Natural resources	49, 50
Nutrition	42, 51
Paedophilia	12
Partners	2, 4, 5, 9, 12, 18, 22, 23, 31, 32, 39, 44, 53, 54, 56
Penalties, Sanctions	5, 10, 17, 26, 29, 43
Performance	2, 7, 14, 44, 45, 47, 49
Policy(ies)	12, 13, 14, 18, 22, 24, 25, 30, 37, 43, 44, 47, 48, 51, 53, 56
Pollution	49
Private life	26, 30, 33, 40
Procurement	20, 25, 27, 29, 34, 44
Procuring (pimping)	11
Prostitution	11, 12
Recruitment	13, 43
Recycling	50
Reputation	3, 5, 21, 24, 33
Responsibility(ies)	2, 3, 4, 12, 15, 38, 52, 53
Safety	15, 16, 31
Security	14, 15, 30, 31, 41, 42
Service provider(s)	9, 10, 20, 25, 34, 41
Shareholders	34
Skills	13, 43, 54
Solidarity	55
Sponsorship	53
Stakeholders	3, 38, 52, 56
Subcontractors	34, 41, 53
Supplier(s)	2, 3, 4, 9, 10, 12, 20, 22, 23, 24, 25, 27, 34, 35, 39, 41, 44, 49, 56
Sustainable	2, 7, 34, 35, 47, 48, 50, 51, 56
Terrorism	23
Trading in influence	5, 17, 18, 21, 22, 53, 56
Training	2, 12, 15, 42, 45, 48, 54
Transparency	17, 25, 34, 37, 52, 53
Trust	2, 3, 7, 34
Undeclared labour	9
Value(s)	2, 4, 5, 6, 17, 22, 23, 45, 49, 53, 54
Waste	47, 50
Water	49
Whistleblowing	5, 14, 15, 18, 20, 25, 39, 43, 44, 48, 54
Working conditions	37, 42, 44







MARCH 2020