# code of business ethics



## LETTER FROM THE PRESIDENT

Almost fifteen years have passed since I decided to develop a concept that was difficult for many to understand at the time. A clinic, but not the kind of clinic we are used to. A wellness clinic focused on helping people to achieve an optimal level of health through a balanced fusion of the most tested and effective natural therapies, a healthy, prophylactic and energy-giving diet, as well as the latest advances in scientific medicine. Our services are provided by the most prestigious international experts in an idyllic natural setting, where attention is paid to the smallest detail.

SHA has already received more than 70 international awards for being the Best Wellness Clinic and Medical Spa in the world. We have continued to evolve and grow since our inception, both in terms of the amount of talent, medical areas and units, and facilities dedicated to wellness; but, above all, in terms of our passion and enthusiasm for bringing our concept of integrative health to every corner of the world, in a credible and transparent fashion, while maintaining our integrity and core values, wthich have been with us since day one.

Such progress can only be achieved if there is a clear understanding of the corporate culture, and if corporate values are respected and implemented in a transparent and ethical manner. At SHA, above all, we try to make our talents feel proud of



our values and our mission, because this spirit is the cornerstone of all of our efforts. These are efforts that we undertake every day and that we are often unable to imagine the high level of positive impact they have on society, because improving people's health through a genuinely integrative method, which produces clear and proven results, is improving the health of the planet from the deepest part of the human being, from the individual, from the body, mind and spirit of each of the people we care for and transform to essentially improve their health and quality of life.

D. Alfredo Bataller Parietti President and Founder

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## BASIC PRINCIPLES THAT SHOULD GOVERN THE BEHAVIOUR OF THE SHA WELLNESS CLINIC AND ITS TALENT AND MANAGERS

#### 1. OBJECTIVE AND SCOPE

The purpose of this Code of Business Ethics (the «Code») is to set out the basic principles by which the following individuals and entities should conduct themselves within the scope of their activities related to SHA Wellness Clinic:

**Albir Hills Resort, S.A.U.** (SHA Wellness Clinic).

The members of the **management bodies** of SHA Wellness Clinic.

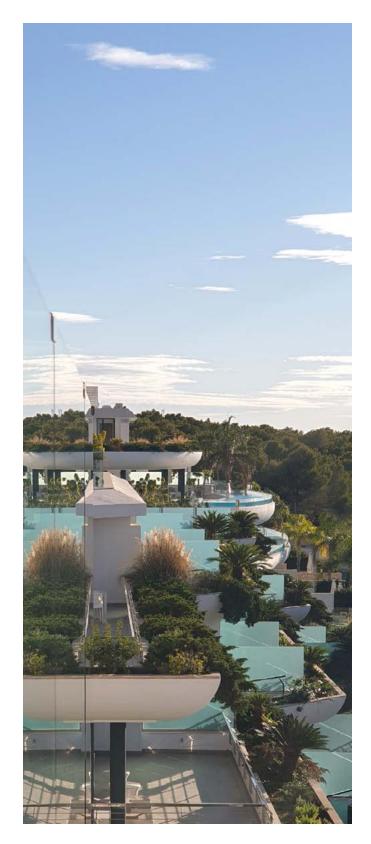
**The talents** that provide services to the company.

## 2. RESPONSIBILITIES OF THE TALENT AND MANAGERS

#### 2.1. SHA SPIRIT

Our thoughts, beliefs and values define our actions.

A brand's values are the cornerstone of its corporate culture, fram-





ing every action and decision that is taken, enabling every member of the organisation to begin and end their day with enthusiasm and with the conviction of having done the right thing, and of having left a positive and meaningful mark on the world.

SHA Wellness Clinic is a company in the wellness and health tourism sector which, since its inception more than a decade ago, has managed to improve the quality of life of hundreds of thousands of people. We have done so through providing a life-transforming experience and our SHA Method, focused on helping

them to achieve and maintain an optimal level of health in order to enjoy their full physical, mental and spiritual potential. This innovative and integrative method combines key disciplines which allow us to improve the health of thousands of guests in a coordinated manner from an integrative point of view, seeking to add years to their life and quality of life to their years.

For this reason, SHA is consistently guided by the mission, vision and values which define its corporate culture. They form the basis of the company's essence and are a true

reflection of the commitment shown to all those people who entrust their health to the SHA Method, as well as to each of the talents, shareholders, suppliers, the local community and society in general.

The high level of excellence in the service provided at SHA Wellness Clinic is due to the personal touch and dedication of its talents. Accordingly, SHA prioritises not only the well-being of each guest, but also the constant effort and dedication of the excellent team that makes up the SHA family, which is fundamental to the company's progress.

#### **Vision**

To be a world leader in integrative health and wellness care.

#### **Mision**

To help people to achieve and maintain an optimal level of health, so that they will live longer with greater vitality and a better quality of life. This is achieved through a unique and integrative method, which combines the latest advances in scientific medicine with the most proven and effective natural therapies, placing particular emphasis on a healthy and balanced diet.



#### **Corporate values**

The values that define the corporate culture of SHA Wellness Clinic are inviolable and unalterable. Although the organisation has been in existence for many years, these values have remained consistent and are becoming more and more relevant, as they are central to SHA Wellness Clinic's ethos.



Care

We genuinely care for our guests, our team, our planet and our resources.



#### **Excellence**

We act with excellence in everything we do, making a habit of it



#### **Integrity**

Honesty and loyalty come first in all our actions



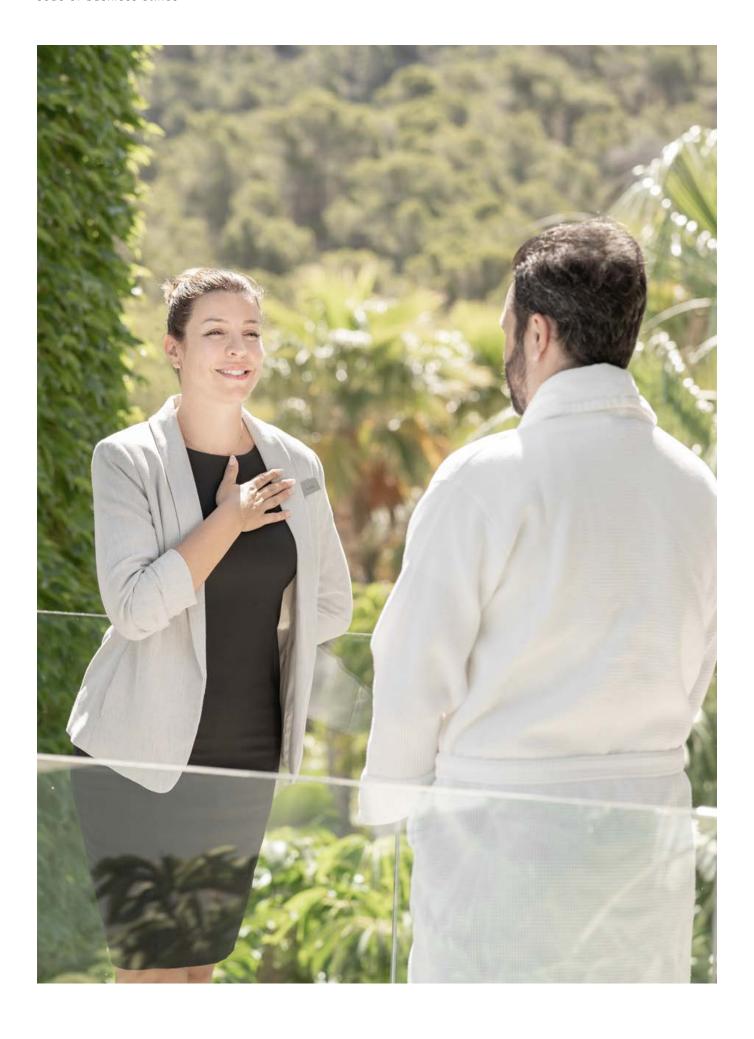
#### **Progress**

We are committed to continual improvement and innovation



#### **Happiness**

We enjoy the journey, tackling challenges with passion and enthusiasm



#### Value commitment

Transforming lives through a unique integrative approach, delivering the best results in the shortest possible time while providing the knowledge to enable people to maintain the optimal level of health they have achieved, all with the highest standards of excellence in every aspect.

#### What sets SHA apart?

#### **INTEGRATIVE METHOD**

We utilise the most integrative method available to achieve an optimal level of health and well-being, combining - in a coordinated manner and with a global vision of health - the latest advances in scientific medicine with the most proven and effective natural therapies, placing particular emphasis on a healthy and balanced diet.

#### LIFELONG HEALTH AND WELLBEING

The best results are sought in the shortest possible time and, at the same time, knowledge is provided so that people can maintain the optimal level of health achieved at SHA, thus taking responsibility for their own health.



#### **EXCELLENCE IN EVERY ASPECT**

The efficiency and effectiveness of the SHA Method is combined with the highest standards in terms of hospitality, comfort and facilities, so that the experience is highly enjoyable as well as transformative.

## SHA's biggest asset: its staff

At SHA Wellness Clinic, the personal warmth, solidarity and spirit of the staff define the company's identity, where respect and care for others and for oneself are a central part of the company's essence. We are a team of passionate people committed to giving the best of themselves every day.

#### 2.2 Responsibilities of the talents

"Few things can help an individual more than giving them responsibility, and letting them know that you trust them"

- Booker T. Washington

All SHA Wellness Clinic, all talents must adhere to the principles and requirements contained in this Code, and ensure that other individuals or groups conducting business on behalf of SHA Wellness Clinic, including contractors, employees, agents, consultants and other business partners, do so too.

Talents must be familiar with and understand SHA Wellness Clinic's policies, procedures and other requirements applicable to the performance of their duties, and they should seek assistance from their superior or legal counsel if necessary.

All talents who are aware or have reasonable suspicion of a breach of this Code should notify their superiors or report it through the mechanisms put in place for suggestions and complaints

#### 2.2.1. Complaints procedure

In the event of becoming aware of any conduct (active or passive) which is in breach of this Code of Ethics, or non-compliance with any other internal regulations, the corresponding complaint or report must be submitted through the following channels:

#### **Email**

codigodeconducta@shawellnessclinic.com

#### Postal address

Albir Hills Resort, SAU

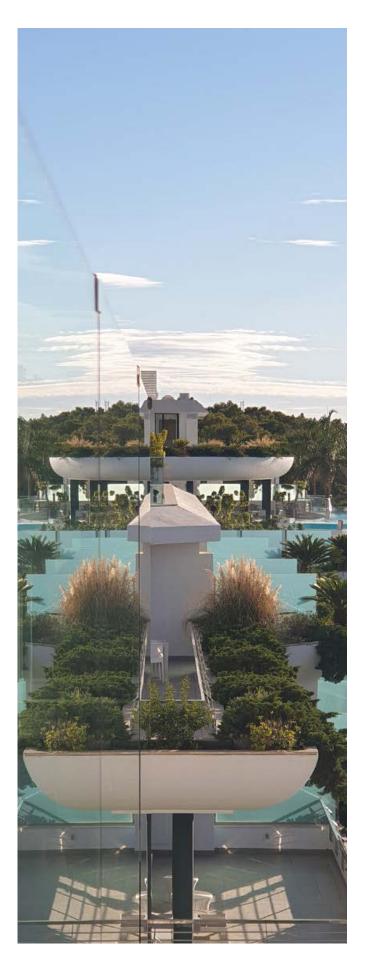
A/A Secretario del Comité de Conducta

C/ Verderol nº5, Playa del Albir

03581 Alicante (España)

SHA Wellness Clinic shall take the necessary measures to prevent negative repercussions due to information provided by talents in good faith and under this Code.

For further clarification of the events that could be the subject of a complaint, reports of breaches of the Code of Ethics should contain the name and surname of the person making the enquiry or reporting the breach, as well as their position and place of employment. They should also include specific details of the circumstances and events relating to the breach, accompanied by supporting evidence or proof. Notwith-



standing the foregoing, conduct that is reported anonymously will be reviewed, investigated and assessed as a potential breach which is subject to verification.

Identification details of the person(s) responsible for the alleged breach.

All SHA Wellness Clinic talents have a duty to cooperate in any investigation into potential breaches of this Code.

#### 2.3. Conduct committee

The conduct committee shall hear, investigate and resolve reported breaches, and shall deal with them in the manner it deems most appropriate, as the case may be. It shall act with full respect for the persons affected, guaranteeing the confidentiality of each of the cases it receives and processes at all times.

SHA Wellness Clinic undertakes to ensure that there will be no retaliation for bringing a breach of the Code of Conduct to the attention of the responsible committee in good faith, nor for having participated in any investigation procedure. The de-

cisions of the conduct committee are binding on the company and on the staff concerned.

## 2.4. Who are the members of the conduct committee?

In order to guarantee the application of this Code, supervise and monitor its compliance, as well as resolve incidents or queries regarding its interpretation and propose measures for improvement, a **conduct committee** has been established which is made up of a member of the Board, the HR manager and the General Manager of the company.

Members of the conduct committee shall abstain from participating in committee meetings, and shall be replaced by another member if they are directly or indirectly involved in the matter under discussion.

The committee shall meet at least once a quarter or whenever necessary to resolve potential breaches related to this Code.

Ordinary notice of such meetings shall be given by the member of the

Board who is a member of the committee, by written notice to the other members thereof, sent at least fifteen (15) days in advance and outlining the agenda of the meeting.

Extraordinary notice may be given by any of the committee's members, after written notice has been given to the other members at least five (5) days in advance, expressly outlining the potential breach or issue giving rise to the need for an extraordinary meeting.

## 2.5. Duties and responsibilities of the conduct committee

The duties of the conduct committee shall be as follows:

**Consultations:** to answer and resolve queries on the interpretation of the principles and standards of conduct contained in this Code, advising on the appropriate way to act in certain events or situations.

**Resolutions:** review and resolve all notifications of breaches related to this Code.

Monitoring: ensure compliance with this Code of Conduct, proposing for its content to be updated in order to reflect the natural changes that occur in the company, the community, the markets, society and/or the legislation in force.

**Circulation:** to disseminate and share the values and standards of action set out in this Code among SHA Wellness Clinic's staff.

The conduct committee shall submit an annual report to the Board of Directors, containing a detailed summary of all activity during the financial year. This report shall reflect not only the promotional actions carried out by the committee, but also the

Guest Relations
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interventions, consultations or resolutions in which it was involved.

IMPORTANT: the conduct committee has no competence in the prevention or resolution of conflicts or ethical dilemmas that may arise in clinical practice, which will be the responsibility of the healthcare ethics committees.

## 2.6. Additional manager responsibilities

All managers shall ensure that their employees are aware of and respect the behaviour principles set out in this Code and support the decisions of the conduct committee.

They shall also ensure that the monitoring procedures put in place to ensure compliance with this Code, and that SHA Wellness Clinic's policies and/or procedures work as desired, notifying their superiors if this is not the case.

#### 2.7. Code violations

Breaches of this Code may constitute an employment offence and may be subject to appropriate sanctions, irrespective of any other liabilities that the employee may have incurred.



#### 3. BASIC BEHAVIOUR PRINCIPLES

In creating this Code of Conduct, SHA Wellness Clinic has incorporated reputable global standards and models of business and industry behaviour from both the hospitality and healthcare industries

The business and professional conduct of the entities and persons subject to this Code shall conform to the following **basic principles**:

#### 3.1. Respect for the law

The activities of SHA Wellness Clinic are carried out in strict compliance with the applicable legislation, as well as the principles and standards set out in the following public commitments:

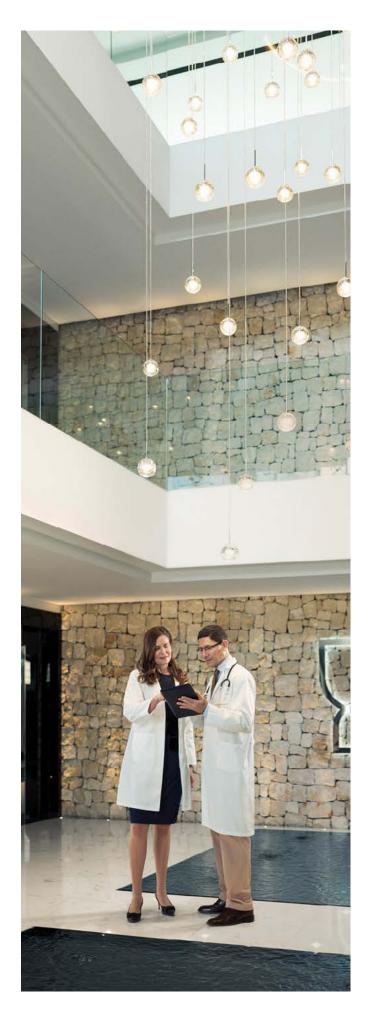
• The Global Compact Principles: a United Nations initiative created

in 2001 for responsible corporate behaviour. It consists of ten principles grouped into four blocks: employee relations, human rights, the environment and anti-corruption policies.

• The World Tourism Organization's Code of Ethics for Tourism:

this code, adopted in 1999 by the UNWTO General Assembly and endorsed by the United Nations General Assembly in 2001, consists of a set of principles aimed at governing the development of tourism, so that the sector can deliver maximal socio-economic benefits, while minimising any negative impacts it may have.

- The ECPAT (Eradicating Child Prostitution Abuse and Trafficking) Code: ECPAT International is a global network of organisations and individuals working together to end the sexual exploitation and prostitution of children, child pornography and the trafficking of children for sexual purposes.
- Council: supported by the United Nations, this is a global initiative dedicated to promoting outreach, awareness and recognition of the best practices in sustainable tourism worldwide. Within a year of its creation in 2010, it had 110 members and representation from all UNWTO regions.
- Convention on the Rights of the Child: this convention was adopted as an international human rights treaty on the 20th of November 1989, and came into effect on the 2nd of September 1990. Throughout its 54 articles, it recognises that children (persons under the age of 18) are individuals entitled to full physical, mental and social development and the right to freely express their views.



- United Nations Climate Change Conference 2015: held in Paris (France), organised by the United Nations Framework Convention on Climate Change (UNFCCC). The outcome was what is known as the Paris Agreement.
- International Labour Organization (ILO) Standards: adopted in 1998, these promote respect for and the advancement of the principles and rights to freedom of association, and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation.

#### 3.2. Ethical integrity

The business and professional activities of SHA Wellness Clinic and its talents shall be based on the values of integrity and honesty, preventing all forms of corruption, as well as respect for the particular circumstances and needs of all the people involved in them. SHA Wellness Clinic will promote the recognition and appreciation of the behaviours that are in line with the principles set out in this Code amongst its talents.

#### 3.3. Respect for human rights

"The secret of peace lies in respect for human rights."

-John Paul II

All actions of SHA Wellness Clinic and its talents shall strictly and faithfully respect **Human Rights and Public Freedoms** as set out in **the Universal Declaration of Human Rights**.

These basic principles will translate into the following commitments.

## 4. RELATIONSHIP WITH AND BETWEEN TALENTS

"The essence of living together is really quite simple: live and respect how others live."

- Eraldo Banovac

SHA Wellness Clinic's relationship with its talents and their relationship with each other will be based on the fulfilment of the following commitments:

## 4.1. Treating people with respect and ensuring non-discrimination

SHA Wellness Clinic assumes responsibility for maintaining a working environment which is free from discrimination (whether based on gender, background, religion, colour, etc.) and from any conduct that in-



volves harassment of a personal nature. All employees must be treated fairly and with respect by their superiors, subordinates and colleagues. Any abusive, hostile or offensive conduct, whether verbal or physical, will not be tolerated.

For this purpose, SHA Wellness Clinic has drawn up a Harassment Action Protocol, a public document available to all talents.

#### 4.2. Abolition of child labour

SHA Wellness Clinic forbids child labour. SHA Wellness Clinic will not use child labour or incorporate any product or service resulting from child labour into its business activity and will ensure compliance with the provisions of the International Labour Organization (ILO) in relation to child labour.

SHA Wellness Clinic requires all its staff and suppliers to strictly adhere to this principle.

#### 4.3. Equal opportunities

"Equality is the soul of liberty; there is, in fact, no liberty without it."

- Frances Wright

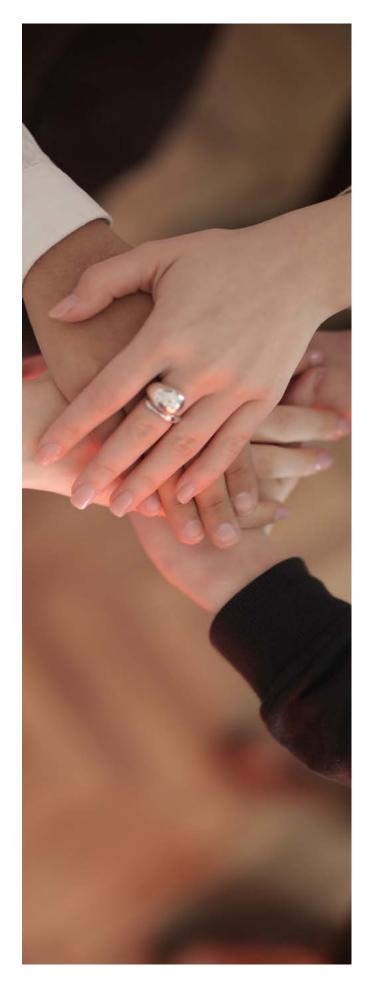
All SHA Wellness Clinic talents shall enjoy equal opportunities for career development regardless of age, gender, marital status, race, nationality and/or beliefs.

SHA Wellness Clinic is committed to establishing an effective policy of equal opportunities for its talents to pursue their professional careers based on the principle of merit. Decisions to promote talent will always be based on objective circumstances and assessments.

Accordingly, SHA Wellness Clinic has an Equality Plan in place which is public and accessible to all talents. It also has an Equality Committee, whose members are the watchdogs and guarantors of compliance with all the principles set out in the plan.

SHA Wellness Clinic is also committed to maintaining a policy of continuous investment to promote the learning, progression and development of its talents, through personal and professional training.

SHA Wellness Clinic talents shall respect the equal opportunities policy in their professional environment, supporting the personal and professional learning of their colleagues.



#### 4.4. Health and safety at work

SHA Wellness Clinic undertakes to provide its talents with a safe and stable environment, to keep its occupational risk prevention measures up to date and to strictly comply with the applicable regulations in this regard wherever it does business.

All talents are responsible for observing strict compliance with health and safety standards in order to protect themselves and other talents or third parties. Likewise, they shall make responsible use of their assigned equipment when engaging in high-risk activities and shall spread awareness among colleagues and subordinates, promoting compliance with risk protection practices.

## 4.5. Respecting the privacy and confidentiality of information concerning talents

SHA Wellness Clinic undertakes to only request and use such data concerning talents as are necessary for the efficient management of its business, or which are required to be documented in accordance with the applicable regulations. Likewise,



SHA Wellness Clinic shall take all necessary measures to preserve the confidentiality of the personal data in its possession and to ensure that the confidentiality of same is maintained when such data is passed on for business reasons, in compliance with the legislation in force.

Talents who, in the course of their professional activity, have access to information concerning other talents or guests, shall respect and safeguard the confidentiality of this information, using it in a responsible and professional manner.

## 5. COMPLIANCE WITH APPLICABLE LAWS

### 5.1. Dealings with government administrations

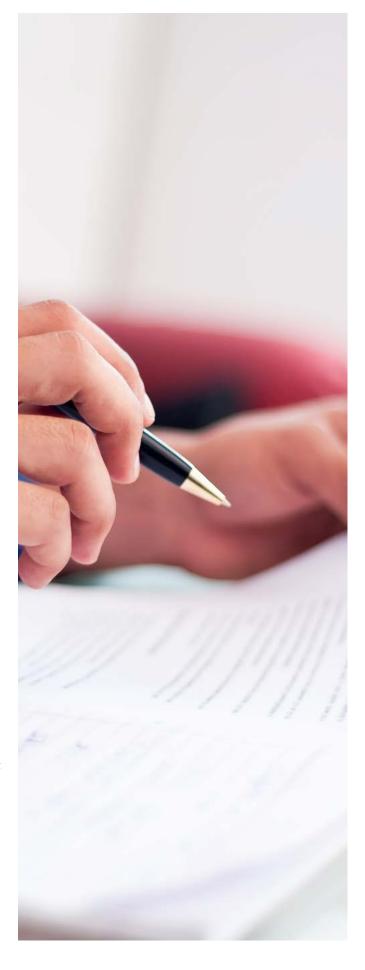
SHA Wellness Clinic's business depends to a large extent on relations with the government administrations of the countries in which it operates. Accordingly, SHA Wellness Clinic is committed to open and honest communication with these bodies.

Talents interacting with government administrations on behalf of SHA Wellness Clinic must ensure that all communications, both direct and through intermediaries, are accurate and comply with all applicable laws and regulations, including those relating to lobbying and anti-corruption.

#### 5.2. Anti-corruption laws

SHA Wellness Clinic requires compliance with all applicable laws prohibiting bribery, especially the bribery of officials, including the Criminal Code of the country in which it operates.

It is forbidden to obtain personal benefits for oneself or for third parties, in



exchange for contracts in which the person may have the power to influence decision-making in the choice or acquisition of products or services.

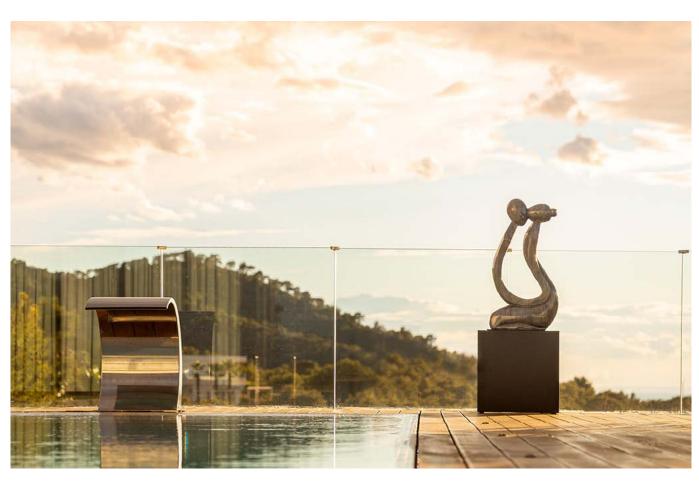
Accordingly, SHA Wellness Clinic implements a Purchasing Policy and Code of Sustainable Conduct, a public document that is available to all talents.

#### 5.3. Anti-money laundering laws

Talents must comply with all anti-money laundering laws, do business only with reputable partners and receive funds only from legitimate sources. Talents should take reasonable steps to detect and prevent unacceptable or suspicious forms of payment, and report any suspicions or concerns to their superiors or through the established channels.

#### 5.4. Fair competition

SHA Wellness Clinic prohibits any activity that involves engaging in illegal practices of unfair competition and undertakes to ensure compliance with the antitrust laws applicable in the countries in which it operates.



## 6. COMMITMENTS TO THIRD PARTIES AND TO THE MARKET

#### 6.1. Excellence

"We are what we repeatedly do. Excellence, then, is not an act but a habit."

-Aristotle

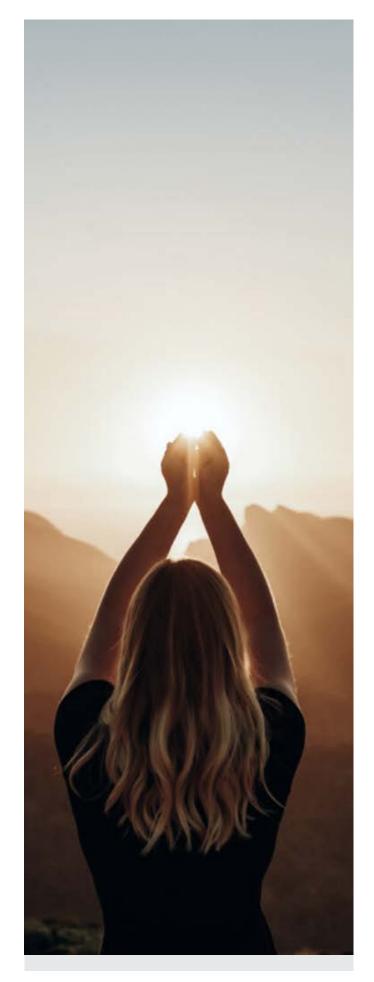
At SHA Wellness Clinic, we are committed to the pursuit of quality in our products and services and we shall provide our talents with the necessary means to implement the most appropriate quality management systems at all times.

SHA Wellness Clinic shall endeavour to meet the expectations of its guests and will make every effort to anticipate their needs.

## **6.2. Confidentiality of third-party information**

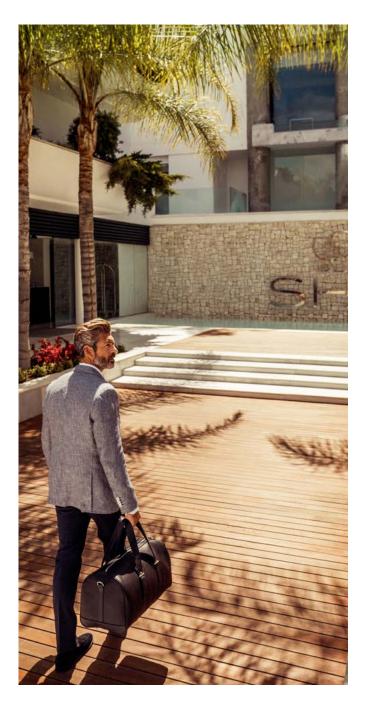
SHA Wellness Clinic guarantees to respect the confidentiality and privacy of third-party data in its possession.

SHA Wellness Clinic undertakes to preserve the confidentiality of the data it holds concerning third parties, without prejudice to the legal, administrative or judicial provisions that require it to be handed over to entities or persons or to be made public.



Likewise, SHA Wellness Clinic guarantees the right of third parties concerned to consult and seek the amendment or rectification of data where necessary.

SHA Wellness Clinic talents, in the performance of their duties, shall pre-



serve the confidentiality of the data in the terms set out above and will refrain from any inappropriate use of this information.

## 6.3. Transparency, value creation and corporate governance

SHA Wellness Clinic and its talents shall base their relationships with guests, suppliers and other talents on the principles of integrity, professionalism and transparency.

SHA Wellness Clinic's business actions and strategic decisions shall focus on the creation of value for its shareholders, transparency in its management, the adoption of the best corporate governance practices in its companies, and the strict observance of the regulations in this regard that are in force at any given time.

#### **6.4. Protection of corporate assets**

SHA Wellness Clinic and its talents shall always seek, within their scope of action and their obligations, the utmost protection of all property and rights that constitute the assets of SHA, preserving the confidentiality of

the information relating to it, which may only be used in relation to the company's activities.

Talents are responsible for safeguarding the SHA Wellness Clinic assets entrusted to them and protecting them from loss, damage, theft, and illegal or improper use.

#### 6.5. Conflicts of interest

"Peace is not the elimination of differences, but simply the constructive handling of them." - William Ury

All SHA Wellness Clinic talents must avoid situations that may involve a conflict between their personal interests and those of SHA Wellness Clinic. They must refrain from representing SHA or intervening in or influencing decision-making when they or a third party linked to them by any significant economic, personal or professional relationship, has a direct or indirect personal interest.

Accordingly, SHA Wellness Clinic implements a Purchasing Policy and Code of Sustainable Conduct, a public document that is available to all talents.



Talents who find themselves in a conflict situation are obliged to report it to their superior.

Conflicts between personal interests and the interests of SHA Wellness Clinic will always be resolved in the interests of the latter.

#### 7. COMMUNITY ENGAGEMENT

#### 7.1. The environment

When it comes to our planet and our health, there's no Plan B. We are what we breathe; we are our choices and our actions.

Let's make an extra effort and take an extra step towards a positive transformation. More than simply caring for and protecting our environment, let's change it for the better.

The concept behind SHA Wellness Clinic has always been based on understanding the importance of living in harmony with people and the environment. At SHA, a great effort is made to ensure that this principle is reflected in all the actions undertaken

While the organisation's mission focuses entirely on transformative healthcare, it is equally important that we look after the health of our



planet. The success of this venture has been defined by a path of environmental and social commitment.

SHA Wellness Clinic will strive to ensure the greatest possible respect for the environment in which it carries out its activities and to minimise any potential harmful impact. It shall provide its talents with the most appropriate means for this purpose.

Furthermore, SHA Wellness Clinic will contribute to the conservation of natural resources and areas of ecological, scenic, scientific or cultural interest. To this end, it will es-

tablish best practices and promote the knowledge and use of these practices among its talents.

SHA Wellness Clinic is committed to strict compliance with applicable environmental legislation, and this commitment is reflected in a Manifesto that includes 8 key points that represent the principles, beliefs and objectives of a social strategy that promotes change.

#### Mindful nutrition

Through the diet that we promote, we raise awareness about meat consumption due to it being a major contributor to global warming. Furthermore, by using seasonal and mainly organic products, we guarantee freshness, taste and nutritional value, promoting environmentally friendly consumption.

### Sharing knowledge to create awareness

We seek to inspire others on a daily basis, creating a positive flow of awareness, care, health and well-being, by giving lectures and talks, through our SHA Magazine, and through newspaper articles and social media posts.



#### Equality, diversity and inclusion

We firmly believe that our employees and talents are the heart of our business and by prioritising diversity, equality and inclusion, we engender respect, valuing differences and minimising prejudice.

#### Zero waste

"Zero waste" means consuming only what we need, being responsible and using the necessary means to prevent waste. It also involves taking an interest in a product's origin and being aware that food waste not only has an economic cost, but a social impact too.

#### Circularity

Caring for our planet requires us to rethink our behaviour as consumers and the way we do business. We must now choose the path of sustainability and circularity, focusing on reducing, reusing, recycling and rethinking our resources, materials and products.

### Carbon footprint and natural resources

We are determined to reduce our carbon footprint and our consumption of water and energy resources. In addition to implementing a range of corrective and preventative measures in our daily operations, we are constantly encouraging our guests and staff to make small changes to their routines that will help us consume sustainably.

## Organic cosmetics and sustainable fashion

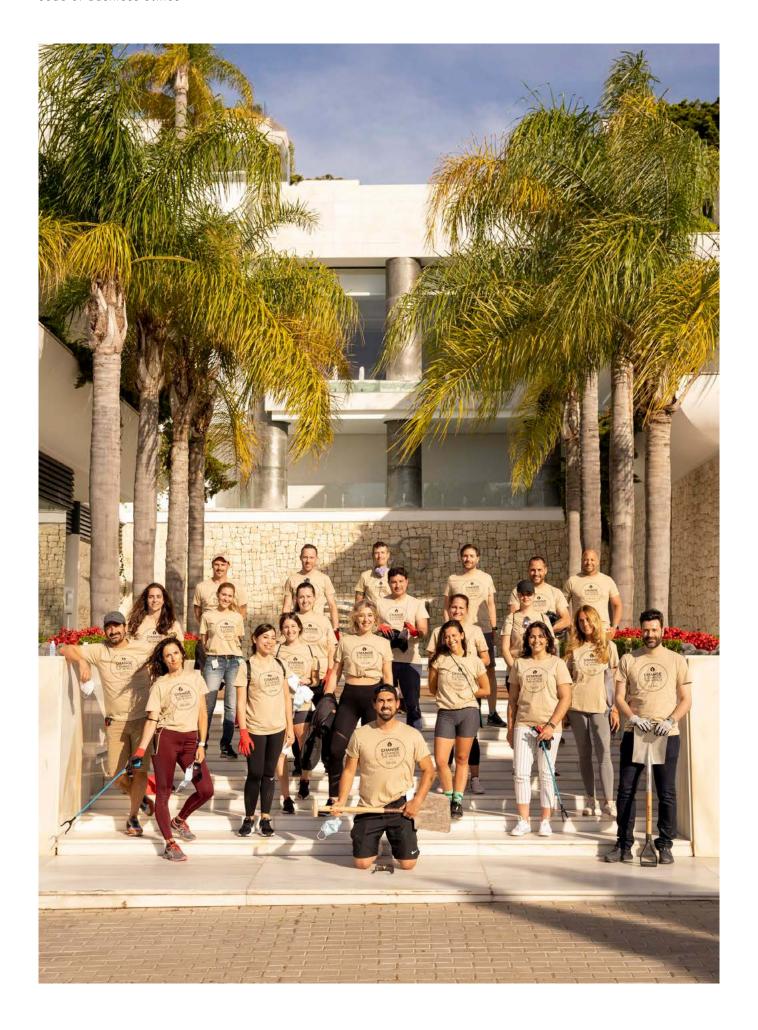
SHA already offers a wide range of organic, natural and cruelty-free products. However, we are committed to going further and to doubling the amount of sustainable products we offer.

#### Going plastic- and paper-free

We all consume large amounts of plastic and paper in our daily lives. By investing in technological innovations that replace the need for paper and by choosing recycled paper for our daily requirements, we can reduce their negative impact.

#### 7.2. Social engagement

SHA Wellness Clinic is committed to acting in a socially responsible manner, in compliance with the laws of the countries in which it operates. More specifically, it assumes respon-



sibility for respecting the cultural diversity, customs and principles of the people and communities affected by its activities, and shall implement concrete measures for the benefit of the local community in which it operates.

SHA Wellness Clinic plays a leading role in the community by sharing knowledge and contributing to the awareness of social and sustainable development.

Some of the social initiatives that SHA Wellness Clinic promotes within its community and geographical area of operation are as follows:

- Promoting healthy lifestyles by raising awareness through education
- · Promoting care for the planet
- Stimulating local trade and entrepreneurship
- Promoting local artists and culture

Accordingly, the social initiatives carried out and/or promoted by SHA Wellness Clinic represent an opportunity to:

- Build trust through honesty
- Make long-term commitments
- Innovate without damaging the environment

 Put our corporate values into practice: integrity, happiness, progress, care and excellence.

SHA Wellness Clinic's Corporate Social Responsibility strategy is aligned with the United Nations Sustainable Development Goals. These were established in 2015 with the aim of achieving a better and more sustainable future for the whole world by addressing the global challenges facing the planet, such as those related to poverty, inequality, climate change, environmental degradation, prosperity, peace and justice.



For any questions or queries related to this Code of Business Ethics, please contact the Human Resources Department at

codigodeconducta@shawellnessclinic.com

