

## NH CORPORATE GIFT POLICY TEMPLATE – Reporting of gifts returned or received

Any time an employee working at any of the centers operated by NH Hotel Group's brands, **receives or returns a gift** (goods/services/invitations) as a result of the performance of the functions assigned within NH, the employee is responsible for observing the requirements set by NH and published in the Intranet, **to inform or request approval. NH Hotel Group's Corporate Gift Policy for details is available in the Intranet.**

In case you have a question or concern about the procedure to be followed, the employee can raise the issue through the channel [giftcompliance@nh-hotels.com](mailto:giftcompliance@nh-hotels.com).

### CONTACT DETAILS OF THE EMPLOYEE WORKING AT A CENTRE OPERATED UNDER NH HOTEL GROUP'S BRANDS

Employee's first and last names: \_\_\_\_\_

Work center and Department: \_\_\_\_\_

Position: \_\_\_\_\_

Country: \_\_\_\_\_

Contact e-mail address (if applicable): \_\_\_\_\_

Contact telephone number: \_\_\_\_\_

### REASON FOR CONTACTING (indicate with an x)

☐ Informing of action taken

☐ Request for analysis and action proposal

### GIFT DETAILS

#### Action taken (indicate with an x)

☐ Gift rejected

☐ Gift received and raffled

☐ Gift received but not raffled, authorization to keep has been requested to MD and/or Chief Officer

☐ Invitations to meals that exceed the limit set (>25€)

#### Gift description (indicate with an x)

<input type="checkbox"/> Cash or cash equivalent (i.e. gift cards)	<input type="checkbox"/> Entertainment tickets	<input type="checkbox"/> Trips
<input type="checkbox"/> Items of value (specify) _____	<input type="checkbox"/> Tickets for sport events	<input type="checkbox"/> Accommodation
	<input type="checkbox"/> Meals	<input type="checkbox"/> Visit to external's facilities
	<input type="checkbox"/> Drinks	<input type="checkbox"/> Others (specify) _____

Gift value per person (please, specify currency): \_\_\_\_\_ €

Reason/purpose of the gift: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### CONTACT DETAILS OF THE COMPANY GIVING THE GIFT

Name of the Company giving the gift: \_\_\_\_\_

Position of the person giving the gift: \_\_\_\_\_

Company name and position of the people being invited to meals that exceed the limits:

\_\_\_\_\_

\_\_\_\_\_

### QUESTIONS

1. At the time you have received the invitation is a tender process taken place with the supplier and/or inviter?

☐ YES

☐ NO

2. At the time you have received the invitation is an offer and/or contract being negotiated with the supplier and/or inviter?

☐ YES

☐ NO

3. Is a negotiation/tender process going to take place within the next 6 months after the invitation?

☐ YES

☐ NO

### GIFTS APPROVALS PROCESS

#### GOODS AND/OR SERVICES > 200€

##### MD/CHIEF

\_\_\_\_\_  
Name  
Signature

#### INVITATIONS TO MEALS > 25 € < 100€

##### DIRECTOR

\_\_\_\_\_  
Name  
Position  
Signature

#### INVITATIONS TO MEALS >100€

##### DIRECTOR

\_\_\_\_\_  
Name  
Position  
Signature

In accordance with current regulations, the data subject is informed that his or her personal data will be processed by NH HOTEL GROUP, S.A. (hereinafter, "NH HOTEL GROUP"), with NIF A-28027944 and registered office at Santa Engracia Street 120, 7º, C.P. 28003, Madrid, with email [dataprotection@nh-hotels.com](mailto:dataprotection@nh-hotels.com) and Data Protection Officer can be contacted by the following email: [dpo@nh-hotels.com](mailto:dpo@nh-hotels.com)

The data will be processed with the following purposes:

Keeping a record for gifts received by employees of any of the entities belonging to NH HOTEL GROUP in the performance of his/her tasks.

Managing requests for acceptance of gifts and requests for information before the Compliance Committee by employees of any of the entities belonging to NH HOTEL GROUP in the performance of his/her tasks.

The data will be kept for as long as required by the legislation that is applicable in matters of regulatory compliance of the company and, in any case, as long as the possible responsibilities that could be incurred in this matter last. Therefore, the basis of legitimacy for the processing of your data is the fulfillment of a legal obligation.

Accordingly, NH HOTEL GROUP will treat the identifying data and contact data, details of employment data and any other data that are strictly necessary to carry out investigations.

The data of the interested party may be communicated to Public Administrations and Courts in the cases foreseen by the Law. In the same way, his/her data may be shared, only in cases in which it is strictly necessary to the entity (s) involved in the procedure and that is part of the NH chain. All these entities can be found via this link <https://www.nh-hotels.es/nh-hotel-group-companies>.

Likewise, the interested party is informed that he/she can exercise his/her rights of access, rectification, erasure, opposition, limitation, as well as the right of portability of his/her data, through the mail account [dpo@nh-hotels.com](mailto:dpo@nh-hotels.com), in the terms established in the current regulations, or by sending a letter to the aforementioned address.

Similarly, when the interested party considers that NH HOTEL GROUP has violated the rights recognized by the applicable regulations on data protection, he/she can file a complaint with the Spanish Agency for Data Protection.