

Process: Master Data Management

Subprocess: Creation of employee as vendor process

Process Owner: Legal & Compliance Área / Accounting & Financial Reporting Área **Process Leader:** Accounting & Financial Reporting Área / Compliance Área

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NH Approvals			
Name	Function	Date	Comments
Accounting & Financial Reporting Área /Compliance Área	Process Owner	04/05/2022	
Accounting & Financial Reporting Área /Compliance Área	Process Leader	04/05/2022	

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Order	Task	Task Description	When	Responsible	Frequency	Tools																				
0	Key Point: Process Compliance Obligation	<i>Non-compliance or non-observance of the provisions contained in this process will imply a violation of the Code of Conduct and the application of the corresponding disciplinary measures.</i>	N/A	All employees in NH hotel Group	N/A	N/A																				
Creation of employee as vendor: General Rule																										
1	General Rule	As general rule, employees, meanwhile their employment contract is in force and former employees (less than 2 years after leaving the company) cannot enter commercial relationship with NH either personally or through a company.	N/A	N/A	N/A	N/A																				
Exception to the general rule																										
2	Exception to the general rule	Exception to the general rule are allowed only in very extraordinary cases and it must be approved according to the below table. The user must request approval via email.	Before the creation of the employee / supplier in SAP	NH users	N/A	email																				
<table><tr><th>TITLE / EMPLOYEE</th><th>ESTIMATED AMOUNT PER TRANSACTION</th><th>APPROVAL BY</th><th>INFORM TO</th></tr><tr><td>Hotel staff / GM</td><td>< 2500 €</td><td>BU Operations Director</td><td>Compliance Committee BU</td></tr><tr><td>Hotel Staff / GM</td><td>> 2500 € or LT Contract</td><td>BU MD</td><td>Compliance Office HQ</td></tr><tr><td>BU / HQ (Below SVP and BU Mgt Committee)</td><td>Any Amount</td><td>Chief of the Area / BU MD</td><td>Compliance Office HQ</td></tr><tr><td>HQ (For SVP, Chiefs and BU Mgt Committee only)</td><td>Any Amount</td><td>HQ Compliance Committee</td><td></td></tr></table>							TITLE / EMPLOYEE	ESTIMATED AMOUNT PER TRANSACTION	APPROVAL BY	INFORM TO	Hotel staff / GM	< 2500 €	BU Operations Director	Compliance Committee BU	Hotel Staff / GM	> 2500 € or LT Contract	BU MD	Compliance Office HQ	BU / HQ (Below SVP and BU Mgt Committee)	Any Amount	Chief of the Area / BU MD	Compliance Office HQ	HQ (For SVP, Chiefs and BU Mgt Committee only)	Any Amount	HQ Compliance Committee	
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Employee / Vendor Creation request																										
3	Employee / Vendor Creation Request	The user must attach the approval email (in PDF format) to the request to create the employee as a vendor: 1.- If the employee / vendor is a physical person, the creation must be requested via JIRA ("MDM Exceptions" Category). The approval email must be attached to the JIRA ticket. 2.- If the employee / vendor is a company, the creation request will be made through SAP following the usual procedures. The approval email must be attached to the request. Any request (through JIRA or SAP) that does not attach the approval email will be automatically rejected.	Creation of the employee / Supplier in SAP	NH User / NH Approver / MDM Team	N/A	N/A																				
Annual Report																										
4	Annual Report	Compliance Office HQ reports on a yearly basis to the Group Compliance Committee all requests submitted for approval with resolution to monitor possible conflict of interest between employees and NHHG.	Once a year	Compliance Office HQ Report	In a Yearly Basis	N/A																				

