



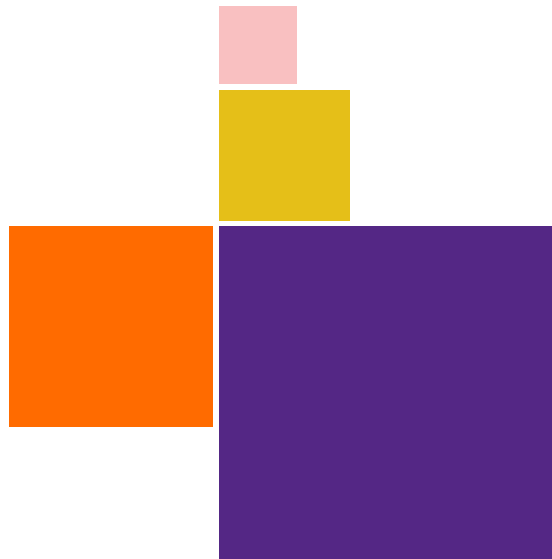
# Dorchester Collection's Code

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## Introduction by the Chief Executive Officer



This code aims to provide you, as an employee of Dorchester Collection, with a clear framework for meeting relevant legal requirements and for acting in accordance with the high ethical standards we set ourselves. It does this by setting out our Vision, Mission and Values, describing the types of behaviour we seek, and providing guidance on what these things mean in your day-to-day work.

The information within it consolidates standards and guidelines in a number of existing documents. These include your contract of employment, and your hotel's written policies and procedures. It is neither a substitute for these, nor does it replace them. It highlights issues that are important to Dorchester Collection as a whole and brings key standards of employee conduct together in one place. Its aim is to help us act consistently wherever we work.

The code will help you respond to challenges that might arise in any working day. It cannot guide you on how to respond to every challenge because these may be many and varied and will differ from one location to the next. It cannot guide you on how to respond to every challenge because these may be many and varied and will differ from one location to the next, but it does provide clear principles and minimum standards that apply, whatever the circumstances and wherever the location.

The code should not prevent you from exercising your own judgement. Dorchester Collection prides itself on the quality and experience of its people. So in addition to using the code, we encourage you to seek advice from colleagues if you are unsure of the right path to take or where another experienced opinion will be valuable.

In setting out fundamental standards, the code is of tremendous importance. It provides a framework for the high standards we give ourselves, and which we seek from third parties such as suppliers, partners and contractors. I encourage you to refer to it and to raise any questions you have about it. Above all, I urge you to uphold the standards it sets and which we aim for as a company.

Yours sincerely

A handwritten signature in black ink that reads "Christopher Cowdray". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Christopher Cowdray

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## Our Vision

Dorchester Collection's Vision is to be:

TREASURED BY GUESTS  
CHERISHED BY EMPLOYEES  
CELEBRATED WORLDWIDE

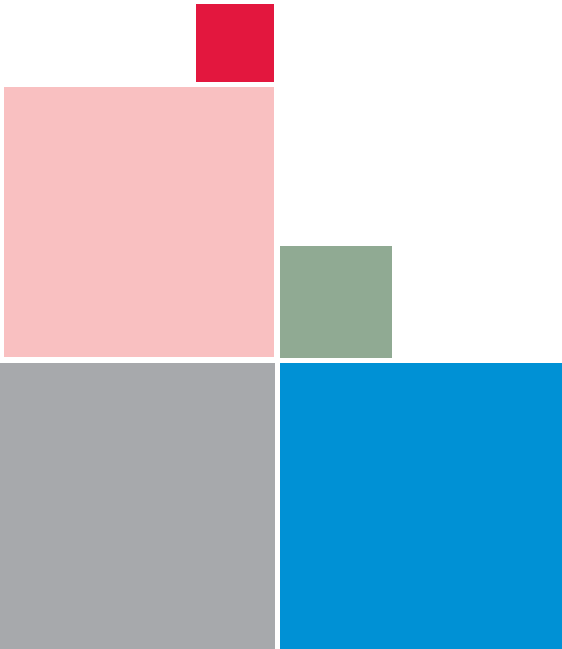
Everything we do, across every department and discipline, is focused on fulfilling our Vision.

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## Our Mission

We seek to support our Dorchester Collection vision through our Mission. Our Mission provides us with the guidance we need to bring our Vision to life:

We care genuinely.  
We encourage diversity.  
We work together.  
Our guests forge our legacy.  
We value kindness over process.  
We remain consistent and relevant.  
We protect our heritage whilst evolving into the future.  
We live vibrantly, now.



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# Our Values

Our Dorchester Collection Values are part of the very fabric of who we are and through living these Values we are able to bring our Vision and Mission to life:



**Passion:** we love what we do. We are determined to deliver our best, every day.



**Personality:** we are unique and extraordinary. We encourage personalities to shine.



**Respect:** we respect and celebrate our differences. They add new brilliance to our culture.



**Working together:** with a shared vision, trust and network of support, we become unstoppable.



**Creativity:** we approach each day with a creative curiosity to add new delight to our guests' experience on every level.



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# Complying with the law

*Wherever located, our properties and our people have an obligation to respect and uphold the law.*

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## **As Dorchester Collection employees, we:**

### **Legal compliance**

Act in accordance with the law, wherever we are working.

Report to a line manager, human resources department representative or in-house legal adviser any instance where statutory obligations are not met or do not seem to be being met.

### **Raising concerns**

Inform a supervisor or line manager immediately if we witness an incident or accident relating to a guest or fellow employee that may have adverse consequences.

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# Our people

*Our people are our most important asset. We are committed to treating every employee with dignity and respect, with processes that are fair and open.*

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## **As a manager or supervisor within a Dorchester Collection hotel, our approach is to:**

Treat all employees at all times with respect, integrity and fairness.

Never participate in or tolerate discrimination or harassment of any kind, be it social, racial, ethnic, sexual or religious or affecting any other protected status.

Nurture, at all times, an environment in which our people can be innovative and take personal and collective responsibility for their actions.

Promote development and training, to include leadership skills, technical skills, personal development and statutory training.

Encourage the exchange of ideas and skills between our hotels as far as possible and look to promote from within the organisation.

Enable employees to perform to the best of their ability; providing feedback and formal appraisals in a fair manner, with assessment based on merit.

Set an example, by ensuring that conduct and decisions demonstrate integrity and high standards.

Inform the director of human resources if complaints or allegations of harassment or discrimination are made.

Maintain the confidentiality of complaints appropriately to allow a full and fair investigation to take place, if required.

## **Diversity and Inclusion**

Diversity and Inclusion at Dorchester Collection are core beliefs of our We Care philosophy. The basis of We Care is to create an environment within our company where all of our employees feel valued and respected, allowing positive engagement to prosper. We continually strive to build and nurture a culture where inclusiveness is part of our DNA reflected by our core values of Passion, Personality, Respect, Working Together and Creativity. We are proud of each and every one of our employees and promote a sense of belonging that transcends all else. We share a commitment to excellence, innovation and social responsibility and are committed to equality for all at Dorchester Collection.

## **Security, health and safety**

Ensure that the safety and security of staff and guests is given foremost importance.

Never encourage or instruct a member of staff to carry out a task which is unsafe or involves actions which compromise their safety or that of others.



**As Dorchester Collection employees, our approach is to:**

Act in accordance with the standards in this code and other requirements and guidance within our contract of employment, policies and procedures, and the employee handbook.

Raise any concerns that arise about our own treatment or that of others with a line manager, departmental manager, or the human resources department.

Follow appropriate procedures, as specified by the human resources department, for the formal raising of grievances and concerns.

Never engage in any conduct which is prohibited by this code, such as any discriminatory behaviour or harassment of any nature.

**Security, health and safety**

Remain aware of hotel safety and security policies and procedures.

Carry out all tasks safely, so they do not put anyone at risk of harm.

Report any unsafe working condition or practice immediately to a supervisor or the hotel health and safety officer, or a member of the management team.

Report any incident that happens in the work place that results in injury, even if it is minor, to a supervisor or the designated health and safety officer.

Report any suspicious behaviour to the in-house security department immediately.



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# Our guests

*We care for our guests and work to provide them with precious and exceptional experiences that anticipate their needs and make them long to return.*

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## As Dorchester Collection employees, we:

### Guest confidentiality

Maintain the confidentiality and privacy of all guests and safeguard the privacy of their information. Details about guests staying at the hotel or about their activities when staying at the hotel should not be divulged to a third party or discussed openly.

Never infringe upon the confidentiality of guests during or after their stay at the hotel.

### Guest concerns

Respond to all guest concerns and complaints promptly and politely.

Follow any procedures set by the hotel or Dorchester Collection for responding to guest complaints.

Notify our supervisors of complaints raised by guests.

Seek guidance from a supervisor if there is any uncertainty about how to respond to a guest concern or complaint.

### Gifts

Consider, when giving or receiving any gift, its motivation and implications and whether accepting or giving it risks tarnishing the reputation of Dorchester Collection or its hotels.

Discuss the acceptance or donation of a gift with a supervisor if there is any uncertainty about the integrity or wisdom of giving or receiving it.

### Entertainment

Where possible, conduct appropriate entertainment in the outlets of hotels under our management.

Consider at all times whether any behaviour could be misinterpreted as seeking to influence another's decision or contravenes our standards of professional and ethical conduct.

## As a manager or supervisor within a Dorchester Collection hotel, we:

### Guest concerns

Encourage employees to keep us informed of guest complaints and concerns.

Seek guidance from leaders/human resources, where necessary, in cases where a guest complaint will result in compensation which is of significant value to the company.

Document or log all serious complaints and the action taken so that a record is maintained and lessons can be learned. This may be recorded in hotel guest databases, for example.

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# Our operations

*We seek to conduct our business with integrity, fairness, and to high ethical, environmental and social standards.*

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## **As Dorchester Collection employees, we:**

### **Financial controls**

Ensure that transactions are carried out in accordance with Dorchester Collection systems of financial control.

Follow all statutory and regulatory requirements in relation to financial processes.

Maintain correct and accurate records of financial data, as required by Dorchester Collection policies and standards, generally accepted accounting practices, and by the law.

Seek guidance from a manager or the in-house finance department if the appropriateness of any financial transaction, record-keeping or process is not clear.

Never falsify financial information or records, or do anything that compromises the integrity of financial information held by Dorchester Collection.

### **Business-sensitive information**

Maintain the confidentiality of all business-sensitive information, and use it only for appropriate and normal business purposes.

Ensure that requests for financial or performance-related information from third parties, such as statutory authorities, the media, researchers, benchmarking groups, trade associations, investors, or the public are handled by the finance and/or sales & marketing departments.

Maintain the confidentiality of data and other information held on Dorchester Collection information technology systems, and ensure it is used for appropriate purposes only and in accordance with data protection and information technology policies.

Check with a supervisor if on any occasion it is not clear whether information is business sensitive or confidential.

Gain authorisation, if required, for the disclosure of confidential information within or outside the hotel.

Ensure that any information provided to an external third party, particularly to other organisations within or connected to the hospitality industry, does not contravene antitrust/competition or data protection law and regulation. If there is any doubt, approval should be sought from a manager, an executive committee member, the Dorchester Collection finance department, or human resources before releasing or sharing any such information.

Ensure that any information obtained about competitors is gathered in legal and legitimate ways.

### **Anti-bribery and corruption**

Comply with all laws and regulations that prohibit bribery and corruption, wherever we are.

Never engage in bribery or corruption in any form – by offering, promising, receiving or seeking anything of value which might influence how a public, commercial, or legal duty is carried out.

Ensure that any business partners, suppliers, contractors and individuals who represent Dorchester Collection or act on Dorchester Collection's behalf follow the anti-bribery and corruption provisions of this code.

## **Conflicts of interest**

Seek to avoid any conflicts of interest or appearance of conflicts of interest when working with suppliers or partners, which would compromise or could appear to compromise decision making.

Raise any concerns with a manager or the human resources department if circumstances arise that may give rise to or constitute a conflict of interest.

Seek the advice and approval of a hotel general manager if a transaction or arrangement is perceived as presenting a conflict of interest.

## **Suppliers**

Ensure that all purchasing from suppliers is carried out in accordance with written hotel purchasing policies (including modern slavery policy), showing proper regard for transparency and fairness in all aspects of the procurement process, from supplier shortlisting, to tendering processes, to evaluation and selection, and supplier performance monitoring.

Never use third parties such as suppliers, partners or contractors in order to avoid the requirements of this code. In our dealings with third parties, we should endeavour to hold them to the same standards of conduct that we apply to our own operations.

## **Corporate Criminal Offence**

Tax evasion is a serious crime. It reduces the amount of money available for public services and increases the tax burden on honest taxpayers. Any organisation that fails to prevent the facilitation of tax evasion commits an offence, whether or not the tax is evaded here or overseas.

We have a zero tolerance to tax evasion and its facilitation. We will not work with any third party (including those who contract with us or otherwise provide services to us) who do not share our values here and who do not have a similar policy.

Further information can be found in our Corporate Criminal Offences ('CCO') Internal Policy and our Employee Code of Behaviour relating to tax evasion. If in any doubt please consult your local director of finance, or anonymously raise these concerns via our 'It's Your Call' whistle-blowing hot-line.

## **Company assets**

Take care when working with the materials, equipment and products of the hotel.

Adhere to hotel policies and standards in the use of hotel property, equipment damage, theft, breakage or misuse.

## **General Data Protection Regulation (GDPR)**

Data Protection General Data Protection Regulation (GDPR) has been designed to harmonise the data protection laws of EU member states, to protect and empower all citizens' data privacy and how organisations approach data privacy.

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations.

Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times across Dorchester Collection.

## **Information systems and computers**

Use Dorchester Collection information systems in an appropriate manner, as set out within the information technology policy. This covers issues such as gaining appropriate access to the internet during working hours and using company equipment, services or technology.

Never use company information systems for the transmission of images, messages, cartoons, text or other forms of information which may be construed as harassment or showing disrespect for others.

Never illegally duplicate software and related information provided by the hotel.

## **The natural environment**

Seek guidance, whenever necessary, on the environmental and health impact of products, goods and services relevant to our work, and seek to minimise any adverse impacts.

Report immediately any incident of environmental damage or harm to a supervisor or the relevant department within the hotel, such as the engineering services department.

Show prudence in the use of natural resources, such as water and energy, and in the use of other resources such as paper and products, seeking to minimise resource use, consistent with carrying out our responsibilities effectively.

## **Distribution, acceptance and reporting**

### **Distribution and acceptance**

All employees will be provided with a copy of Dorchester Collection's code and are required to acknowledge acceptance and understanding, in writing, of its provisions.

When an individual is first employed by Dorchester Collection and thereafter in accordance with company policy, they must acknowledge that they have read or re-read, as the case may be, this code. All employees in positions of authority must acknowledge that they have read or re-read this code annually.

In addition, where an individual is engaged under contract to provide services to the company, they will be provided with a copy of the code and must sign the prescribed form acknowledging that it will apply to them as if they were an employee.

### **The duty to report**

To maintain a work environment that is respectful, productive and protects the safety of employees and guests, it is important that all suspected or actual violations of this code are reported immediately so that they may be investigated and resolved. The code may not cover every circumstance. As a result, employees should report all activities which they believe may violate its clauses or spirit.

Employees must report suspected unethical activities to their manager, the human resources department, the executive committee, the general manager or Dorchester Collection. If you feel you have been unable to resolve your issues or concerns regarding possible violations of this code through the normal processes in place in your property, you are free to use the dedicated and confidential telephone line, 'It's Your Call', which is available at all times, every day, to raise your concerns about possible instances of violations of this code.

All reports of activities that may be in violation of the code will be treated seriously and will be handled promptly, discreetly and professionally. Employees are encouraged to identify themselves, but may choose to remain anonymous when making these reports.

Discussions and enquiries will be kept strictly confidential to the extent appropriate or permitted by company policies and procedures and applicable laws, rules and regulations in the various locations in which the company conducts business.

It is a serious violation of the code for a manager or employee to discriminate or retaliate against any employee for making a report.

If you have any questions about the requirements or other information within this document, you should contact your manager, your human resources department or the general manager within your hotel.



# Acknowledgment form

I have received a copy of Dorchester Collection's code. I certify that I have carefully read the code and have had the opportunity to ask questions of clarification to my manager or supervisor or a representative of the human resources department. I agree to abide by the guidelines set out within the code.

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Print name

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Date

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Signature

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Department

