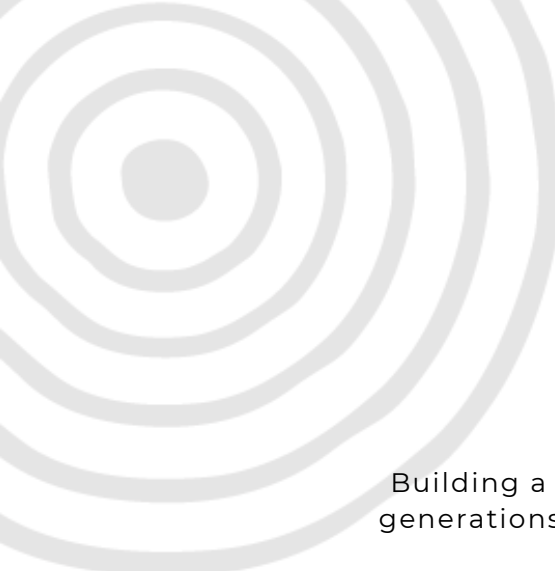


CODE of CONDUCT & ETHICS



Building a more sustainable future and inspiring future generations are integral aspects of our company's vision, embedded in our DNA.

We are deeply committed to operating with integrity and respect towards all our stakeholders and to promoting and showcasing ethical behaviour both internally and externally, complying with all regulatory frameworks.

We turn our Values into Actions on a daily basis.

Our Code of Conduct & Ethics outlines a model of exemplary and ethical behavior which permeates through all our operations and is an important guide for our people and business partners. Everyone in the company, regardless of their position in the hierarchy, is expected to demonstrate admirable behavior and adherence to all applicable laws and regulations.

This Code of Conduct is applicable to all bluegr stakeholders, employees and partners.

OUR VISION, OUR LEGACY

Bluegr stands on solid foundations of ethical conduct and core values such as Ethos, Integrity, Accountability and Justice, which have played a fundamental role in our success and perfectly reflect our commitment to hospitality excellence and sustainable growth, as well as our vision to mentor and inspire future generations through our experience.

We grow and improve by following the guideline set by the Stoics: *If we are what we repeatedly do, excellence then is not an act, but a habit.* With our Code of Conduct at center focus and our core values as constant protagonists we steer towards excellence even beyond habit.

Our Code of Conduct and Ethics outlines a model of exemplary behavior which permeates through all our operations. It is therefore essential that we understand it and let it guide us in our daily conduct. That way, every single member of our team will be an advocate for our values and principles. As advocates of profitable and sustainable growth, we work hard to always meet the needs of today while cultivating long-lasting relations with all our partners.

Being a family business means leading by example and never stop gazing at the future. Passing our legacy and family values from one generation to the next is the most important indicator of our long-lasting success. As an aspiring holistic leader and parent, it is my hope to gently pass the torch to the next generation with modesty and honesty as core values.

Life is what you make of it. Together, we design spaces built on the knowledge of the past and our vision of the future, with appreciation of timeless values. It is with a deeply rich experience in hospitality (*philoxenia*) that we are honored to invite you to experience these values in person.

Gina Mamidakis
CEO, bluegr Hotels and Resorts

A UNIVERSAL SET OF PRINCIPLES

Since 2016, we have been supporting the UN Global Compact (UNGC) network. We embrace the 10 UNGC principles on human rights, labour, the environment and anti-corruption, reporting our activities annually with our Communication on Progress (COP).

We conduct our business according to a universal set of principles, a holistic code of conduct that adheres to the 10 principles of the UN Global Compact. We strongly believe that sustainability can only be achieved when all stakeholders are in agreement, act ethically and adhere to these fundamental principles embedded in our business practices and activities. We foster a collaborative sustainable development model and contribute to SDG 8 (good jobs and economic growth).

In addition, since 2016 we have been applying the EFQM Excellence Model, a universal standard that emphasizes the role of the organization as a responsible member of the community, adopting an ethical approach as the best way to serve the long-term interests of our stakeholders.





OUR MISSION

To delight our guests with personalized experiences in a sustainable, authentic and warm environment.

OUR VISION

To provide hospitality excellence, strive for sustainable growth, care for our people & communities, and inspire generations to come.

OUR VALUES

Prudence, Magnanimity, Ethos, Passion, Bravery, Justice, Integrity, Accountability, Modesty

This Code is consistent with our DNA, and highlights the values of Ethos, Integrity, Accountability and Justice, as vital for the sustainability of our business.

OUR CORE BELIEFS

STRONG FAMILY VALUES

We are a *family business*, passing our legacy and family values from generation to generation

EXCELLENCE

We are self-motivated, driven and responsible

BEAUTY AND SIMPLICITY

We love *beauty, elegance* and *simplicity* as taught by nature

WILL POWER, PASSION & COMMITMENT

We are fueled by our *strong will power* and base our actions on *passion* and *commitment*

BE A CEO

We all think and act as leaders with *determination*, direct & effective *communication*

TECHNOLOGY, INNOVATION & CREATIVITY

We welcome *surprises*, foster *creativity* and embrace *technological developments*

BE AMBITIOUS - NEVER GREEDY

AUTHENTICITY

It's not just about travelling; it's about *travelling well*

INSPIRE OTHERS TO LEARN, TO DREAM, TO DO, TO BECOME

EFFICIENCY AND EFFECTIVENESS

To *focus and prioritize* is the ability to win

DELEGATION, EMPOWERMENT & RECOGNITION

We encourage *initiative* and always give *credit*

COMMON SENSE, CRITICAL THINKING & EMOTIONAL INTELLIGENCE

are our *superpowers*

TOGETHERNESS AND ENTHUSIASM

Teamwork makes the *dreamwork*

NEVER SAY NEVER

Nothing is impossible

RESILIENCE AND ADAPTIVNESS

Success is a *marathon*, not a short sprint

LIFELONG EDUCATION & PERSONAL DEVELOPMENT

for continual *improvement*

FINANCIAL POWER & SOLID RESULTS

for *sustainable growth*

POSITIVE THINKING

We see problems as *challenges*

This Code is consistent with our DNA, and highlights the values of Ethos, Integrity, Accountability and Justice, as vital for the sustainability of our business.

OUR STAKEHOLDERS



OUR COMMITMENTS

towards

OUR GUESTS

We are committed to providing hospitality excellence and exemplary and authentic experiences to our guests. We demonstrate our respect by offering the best services and care, by prioritizing

Health & Safety and always striving to better ourselves. We conduct regular guest surveys to monitor our performance, and our passion for what we do is discernible in our long-lasting value. Our B2B portfolio follows this momentum and delivers long-lasting value and tangible results.

OUR SHAREHOLDERS & OWNERS

We are committed to our shareholders and owners, ensuring the good reputation of the company and always acting in its best interest with transparency, integrity, reliability and respect for its assets, including intellectual property. As brand ambassadors, we operate responsibly through a set of core values, standards and mechanisms that ensure the safest possible transactions of all activities.

OUR BOARD OF DIRECTORS/EXCO

We are committed to the implementation of corporate governance and group strategy, and we recognize that our board and executive committee are vital contributors to the sustainable development of our business. We trust that the board members and executive committee lead the company effectively, administering the necessary dynamic for its continuous growth.

OUR PEOPLE

We wish to be an employer of choice; therefore, the happiness of our employees is a top priority. We strive to establish a positive and stimulating working environment where everyone is inspired and encouraged to take initiative, participate and grow, as well as act as a CEO and/or Brand Ambassador. Such opportunities create a stimulating culture in the working space.

We take pride in our strong family legacy and as a result we are committed to treating all our employees equally. We provide safe space for expression, where every opinion is heard and considered with respect. We ardently support and promote respect and equal treatment.

We have developed and implemented special policies and protocols with regards to the Health & Safety of all employees, ensuring everyone's well-being in a secure and safe working environment and encouraging everyone towards a healthy work-life balance.

We address GDPR regulations through trainings and relevant policies.

We strive to cultivate a culture of Togetherness and Openness through the distribution of employee opinion surveys. Our "no door policy" provides all employees with a safe space to discuss -in full confidentiality- any problems associated with their professions/careers. Our people can be sure that any issues they discuss with their respective supervisor will be treated with the outmost respect.

OUR COMMITMENTS

towards

OUR PARTNERS & SUPPLIERS

Our relationship with our partners and suppliers is characterized by honesty, consistency, transparency, trust and fair treatment on both sides. Our suppliers are happy to comply with all of Greece's relevant and appropriate laws and regulations. As a company with a strong ethical commitment, we require that all our suppliers ensure the health, safety, and well-being of their employees, adhere to laws regarding child or forced labor, adopt non-discriminatory employment practices and respect labor provisions.

SOCIETY AND LOCAL COMMUNITIES

We recognize our responsibility to conduct business in a way that protects and enhances the communities in which we live and work.

Community involvement is an essential part of our mission, we therefore encourage our employees to be active citizens and participate in actions and events of solidarity and voluntarism.

We are initiators of the "We do Local" certification scheme that supports Crete's production, economy and human resources.

The G. & A. Mamidakis Foundation (est. 1993) supports and promotes contemporary art and culture, lifelong learning and the transmission of knowledge to future generations. We envision to be a source of inspiration and a point of reference for artists and art lovers. Based primarily in Crete, and guided by our love for art and culture, we conceptualize, coordinate, and realize an ambitious annual program of initiatives and events. We envision to create and maintain a network of people from various fields, which will continue to grow, offering mutual support and opportunities for future collaborations.

We identify and prevent the potentially harmful impact of our activities on local communities. We establish mechanisms to monitor our environmental footprint and we maintain an ongoing dialogue with local stakeholders.

LOCAL AUTHORITIES

We comply with local authority directives, and we are constantly open to constructive dialogue so as to enhance local mechanisms and further actions for the good of the local community. We reduce direct impact of our operations to the environment and we maximize the positive impact and stimulate economic and social development. Through the Travel Life Certification we are able to evaluate our sustainability achievements and benchmark ourselves with other hospitality industries, to pursue best practice and improvement. We have developed policies that ensure this commitment is set in place, such as our Risk Assessment and relevant course of action. We pave the way in socio-economic initiatives acting as accelerators of progress and change.

We condemn all forms of violence, harassment and discrimination and do not tolerate any such behaviours, of any kind by anyone. It is our priority to create and maintain a work environment that respects, promotes, and ensures human dignity and every person's right in a work environment that is characterised by respect and solidarity.

We properly and correctly inform our employees about their rights, the concepts regarding harassment and violence, the obligations of the company in case of a prohibited event and the procedures that will follow. The investigation and examination of all complaints will be carried out with the outmost respect and confidentiality for all parties concerned.

We promote standards of excellent conduct based on the principles and values that characterize our company and corporate culture, and we encourage the reporting of unwanted behaviors, in order to assist in their timely eradication.

More information regarding Violence/Harassment/Discrimination issues can be found in the relevant company Policy against violence and harassment.

SUPPLIER CODE OF CONDUCT

1. The bluegr Supplier Code of Conduct (“the Code”) outlines the minimum requirements and standards requested by bluegr of its suppliers (supply chain) regarding foods, beverages, materials and other products and services.
2. The Code applies to all bluegr suppliers (with few exceptions where appropriate, such as occasional purchases), and employees who have a direct and/or indirect relationship with its suppliers.
3. Bluegr’s relationship with its suppliers is characterized by honesty, consistency, transparency, trust and fair treatment for all.
4. Bluegr suppliers must comply with all relevant laws and regulations of Greece and of all other countries in which they operate.
5. At the same time, bluegr requires its suppliers to ensure the rights of their employees, not to employ child and/or forced labor, to adopt non-discriminatory employment practices, to respect labor provisions and to ensure a decent, safe and healthy working environment.
6. Finally, bluegr requires suppliers to demonstrate high standards of business ethics, reliability, integrity, modesty and assumes absolute transparency in all dealings with them, based on its zero tolerance for corruption.
7. No bluegr employee shall accept direct and/or indirect gifts or benefits (either financial and/or in kind), from suppliers, which attempt to influence business decisions, based on bluegr’s zero tolerance for bribery.
8. Supplier selection may include criteria such as support of local suppliers, innovation, aesthetics, outstanding quality of products and services, and the long-term added value to bluegr and its stakeholders.
9. Bluegr invites its suppliers to demonstrate social and environmental responsibility and get involved, when possible, in actions and social and environmental awareness initiatives, especially in communities where bluegr operates.
10. Bluegr encourages synergies between its suppliers, as part of its B2B initiative, in order to examine proposals and cooperation possibilities based on mutual benefit, both for bluegr and for its suppliers and stakeholders.
11. Relevant documents to this Code, which outline the principles, standards, procedures and guidelines used by bluegr and are directly or/and indirectly related to its procurement policy, are included in the following certifications: HACCP/ISO- 22000, ISO-14001 and TRAVELIFE (TUI).
12. Violation of the Code’s principles by any bluegr employee may result to the dismissal of the employee, while a breach of the Code principles by a supplier may result to the termination of cooperation with the supplier.
13. Bluegr encourages its suppliers to control their own supply chain and adopt relevant codes of conduct for their suppliers.



If you are part of the bluegr family and you are aware of a violation of law or regulation, please report it to your Supervisor, Line Managers and/or HR Department and give us all relevant information.

If you are a supplier, you may contact our Supplies Manager, Ms. Tanya Hanikian at tanya@bluegr.com or +30 2155007706.

For all other stakeholders you may contact our central offices at +30 2155007700 at 107, Pefkon str., GR-14122, Heraklion, Greece.



*The greatest Virtues are
those which are most
useful to other persons.*

-Aristotle-



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