

# CHEZ BELMOND

WHERE INTEGRITY IS ALWAYS ON THE MENU

## TO START

### Key Ingredients

Message from the Head Chef  
Our Behaviours

### Who does this Code of Conduct apply to?

Everyone who works at or for Belmond - we are all expected to comply with this Code and the policies it is built upon.

### Where can I get help & advice, or raise concerns?

Your Line Manager, DMD, HR or Global Legal  
Compliance@belmond.com  
Belmond Speak Up! Line ([bit.ly/3XqJ3Qj](https://bit.ly/3XqJ3Qj))  
LVMH Alert Line ([bit.ly/3XrLm5Y](https://bit.ly/3XrLm5Y))

### What happens if I Speak Up?

Belmond has zero tolerance to retaliations against anyone raising a concern in good faith.

**Side Dishes:**  
Speak Up Policy

### Bribery, Gifts, Entertainment, Donations & Sponsorships

Our position is clear. We have zero tolerance to all forms of corruption and influence peddling. The payment or acceptance of bribes, hidden commissions or facilitation payments are strictly prohibited.

Giving or accepting gifts and entertainment (including complimentary or discounted travel or stays at our own properties), and the making of any donations or sponsorship deals must be in accordance with our policies.

#### Side Dishes:

Anti-Bribery & Corruption Policy  
Gifts, Entertainment, Donations & Sponsorships Policy  
Compliance Hub  
Third Party Due Diligence Policy  
Gifts and Entertainment Toolbox Talk

### Privacy & Confidentiality

Our guests and colleagues entrust us with their personal information. Belmond and the wider LVMH Group entrusts us with sensitive business information. We respect and protect the privacy, security and confidentiality of that information.

#### Side Dishes:

IT Policies  
Privacy Policy  
Data Retention Policy

## THE MAIN COURSES

### Personal Integrity

We are committed to providing a respectful, caring, collaborative, safe and inclusive place to work.

**Side Dishes:**  
Respectful Working Policy

### Business Integrity

We take our responsibilities as a corporate citizen seriously, and always comply with the law.

We only work with third parties who share our values (set out in our Supplier Code of Conduct).

**Side Dishes:**  
Third Party Due Diligence Policy  
Global AML Policy  
Modern Slavery Statement  
Supplier Code of Conduct

### Preventing & Managing Conflicts of Interest

Personal relationships at work or interests in businesses which supply or compete with Belmond can damage trust.

Actual or potential conflicts of interest must be disclosed in accordance with our policies.

**Side Dishes:**  
Conflicts of Interest Policy  
Compliance Hub

### Protecting our Business & Reputation

Everyone at Belmond has a role in making sure that Belmond's money is appropriately spent, our business records are complete and internal controls are honoured. We only speak on behalf of Belmond when we have been specifically authorised to do so.

#### Side Dishes:

Contracts Policy  
Delegation of Authority  
Third Party Due Diligence Policy  
Social Media Policy  
Anti-Money Laundering Toolbox Talk

## TAKE AWAY MENU

### We do the right thing

Not what is easy

### We understand our obligations

Everyone at Belmond must familiarise themselves with and comply with this Code of Conduct, the policies it is built on, the LVMH Code of Conduct and LVMH Internal Guidelines.

We seek help or advice when we are unsure of the right course of action.

### We Speak Up!

When we have a concern that there has been a breach of our Code, policies or the law.