

CHEZ BELMOND

WHERE INTEGRITY IS ALWAYS ON THE MENU

CONFLICTS OF INTEREST POLICY

Policy - at a glance

- ✔ We actively avoid conflicts of interest (or the appearance of them).
- ✔ We promptly disclose all conflicts of interest to our Line Manager using the [Conflicts of Interest Register Form](#).
- ✔ We submit all completed Conflicts of Interest Register Forms to the local HR Director or Financial Controller, for inclusion in the Compliance Hub.

Purpose

You may find yourself confronted with a situation in which your own personal interests are (or may be) different from the interests of the Belmond Group or the wider LVMH Group. This is known as a conflict of interest. Having an undeclared conflict of interest could negatively impact the effective operation and reputation of our business, and expose us to legal risks. This means it is crucial that you disclose all conflicts of interest, so that they can be properly managed.

The purpose of this policy is to outline our mandatory requirements when an actual, potential or perceived conflict of interest arises, to ensure that it is managed properly.

Commitments

We each commit to the following:

- ✔ we actively avoid conflicts of interest (or the appearance of them);
- ✔ we identify when we have an actual, potential or perceived conflict of interest;
- ✔ we complete a statement on a yearly basis to confirm the absence of any conflicts of interest or report any situations that are or could potentially create a conflict of interest;
- ✔ we promptly disclose all actual, potential or perceived conflicts of interest as soon as they arise to our Line Manager using the [Conflicts of Interest Register Form](#). We seek acknowledgment and approval of all disclosures made;
- ✔ we submit our completed [Conflicts of Interest Register Form](#) to our local HR Director or Financial Controller, for inclusion in the relevant property/global/divisional office Compliance Hub.

Additional responsibilities - Line Managers & Conflict Managers

Upon notification of a conflict of interest, Line Managers are required to consult with the following individuals, to obtain support in developing a plan to manage, reduce or remove the conflict.

	Conflict Manager
On property (excluding GMs) / Corporate Office (excluding VPs/ECM)	HRD
GMs	DHRD
VPs / ECM (excluding CEO)	SVP HR
CEO	Chairman and CEO LVMH Hospitality Excellence

How to identify a conflict of interest

Click on Bianca to explore how to identify a conflict of interest:



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What happens when we disclose an interest?

- ✔ Your Line Manager will review the disclosure and related details, supported by the Conflict Manager and HR (and the Compliance Team, where necessary).
- ✔ Your Line Manager will work with you to develop a management plan to manage, reduce or remove the conflict.
- ✔ Your Line Manager will complete the [Conflict of Interest Register Form](#), and return it to you for submission to the Compliance Hub.
- ✔ Your Line Manager will monitor and revise the management plan as needed.

Further guidance

Should you have any questions or require further guidance regarding this policy, please contact the Compliance Team at compliance@belmond.com.

Application

Click on Marie to explore who this policy applies to and the consequences of any failure to comply with it.



Governance

Approval Date: 27.04.2023	Effective Date: 27.04.2023	Next Review Date: 2024
Version: 1.0	Division: Global	Authority: Ethics & Compliance Committee
Policy Owner: General Counsel	Contact: compliance@belmond.com	Associated Policies & Guidance: Code of Conduct LVMH Guiding Principles on Managing Conflicts of Interest Conflicts of Interest Register Form How to Identify a Conflict of Interest Our Responsibilities Speak Up Policy Gifts, Entertainment, Donations & Sponsorships Policy

