




CHEZ BELMOND

WHERE INTEGRITY IS ALWAYS ON THE MENU

SPEAK UP POLICY

Policy - at a glance

-  We speak up without fear of retaliation when we know or suspect that our Code of Conduct, policies, or the law may have been broken.
-  We know what our reporting channels are and we raise our concerns through them.
-  We never retaliate against anyone for having raised a concern in good faith or participated in its handling.




Purpose

The Belmond Group and the wider LVMH Group is committed to complying with all applicable laws and regulations and to conducting its business on the basis of the principles set out in the Code of Conduct and associated policies. Belmond encourages open communication and dialogue and you are invited to seek guidance or report, in good faith, existing or reasonably suspected ethical breaches of which you have become aware.



The purpose of this policy is to describe how and when your concerns should be reported to us.

Commitments

We each commit to the following:




-  we speak up without fear of retaliation via one of our reporting channels when we know or suspect that our Code of Conduct, policies or the law may have been broken;
-  we provide complete and precise information and documentation to facilitate the processing of the report, noting that such information / documentation may be used for the purposes of the investigation. We do not provide details about anybody's private life, unless strictly necessary and relevant to the concerns raised;
-  we understand that it is important to use the proper channels to raise and investigate concerns on Belmond's behalf. We do not investigate matters ourselves.

Belmond's Commitments

-  All investigations are undertaken by a team, who are subject to confidentiality obligations in respect of any information Belmond holds relating to the author of the report, the person(s) targeted or otherwise mentioned in the report, and/or the information or documentation that has been gathered in connection with the investigation of the report. Any breach of this obligation may lead to disciplinary or legal sanctions in accordance with applicable laws.*
-  Belmond is committed to ensuring that no disciplinary action or retaliation is taken against the author of the report, or any persons assisting the investigation, where the concern has been raised in good faith, even if the reported facts subsequently prove to be inaccurate or unfounded or do not give rise to any proceedings or penalties.

Reporting channels

Belmond has a network of contacts available to you, who you can approach if you have concerns. Your Line Manager is usually the most appropriate person to speak to, but if you are concerned about speaking with your Line Manager directly, you may also raise your concerns to:

-  HR, or your DMD (divisions) or ECM member (corporate office);
-  Global Legal or Compliance (compliance@belmond.com);
-  the [Belmond Speak Up Line](#) or [LVMH Alertline](#). These channels enable you to raise your concerns confidentially in your preferred language, 24 hours per day. The lines are hosted by an independent third party and concerns received are sent to the Compliance Team, who work with the relevant subject matter experts to review and investigate your report.

*Such information may be disclosed where required by law or for safeguarding purposes.



CHEZ BELMOND

WHERE INTEGRITY IS ALWAYS ON THE MENU



Can I make an anonymous report?

Subject to any restrictions under local law, you may make a report anonymously via the Belmond Speak Up Line or LVMH Alertline. However, you are encouraged to identify yourself and/or provide contact details to assist us to investigate your concerns.

When should I speak up?

Click on Bianca to explore some examples of circumstances when you should speak up:



What does retaliation mean?

Retaliation means any direct or indirect negative consequence as a result of having made a report to us. If you believe you have suffered any of the following (or any other negative consequence) as a result of making your report, please immediately notify the Compliance Team by email to compliance@belmond.com:

- threats, coercion, intimidation;
- isolation, harassment, or discrimination;
- reputational damage (including through social networks);
- negative performance feedback unrelated to actual performance deficiencies;
- demotion or the withholding of a promotion;
- reassignment, transfer of duties, or a change in working conditions or hours;
- disciplinary measures, suspension or dismissal;
- termination of your contract.

What happens when I make a report?

Details of how your report will be addressed within Belmond and the wider LVMH Group may be found in the [LVMH Alert Policy](#).

Additional responsibilities - Line Managers, HR & Leaders

- ✔ Help to protect our business if someone raises a concern with you which relates to a known or suspected breach of our Code of Conduct, policies or the law by immediately informing the Compliance Team by email to compliance@belmond.com.

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 and associated policies LVMH Alert Policy When should I speak up? Our Responsibilities

