



Feel Welcome

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Ethics AND CORPORATE SOCIAL RESPONSIBILITY CHARTER



SOFITEL PULLMAN



NOVOTEL

Mercure

ibis

ibis
STYLES

ibis
budget

MESSAGE FROM GILLES CLAVIE

As a leader of the hotel industry in Eastern Europe, Orbis aspires to be the broadcaster of positive hospitality and the trendsetter in sustainability and ethics for the hospitality market in its region.

I strongly believe that positive results are driven not only by the right strategy, it is by focusing on people – building the organization based on our employee's talents and putting a hotel guest in the center of each of Orbis actions, on performance – moving towards operating excellence and best quality of services, and on portfolio – expanding Orbis hotel network in the region but also by a global, sustainable approach.

Empowering the diversity of our employees who are Orbis' Ambassadors on a daily basis, exemplary optimization of energy and water consumption, serving truly healthy & sustainable food, green investments or deploying and running such groundbreaking initiatives in Poland as protection of children against abuse are only few examples showing that sustainability and ethics are not empty words for Orbis.

Sustainability and ethics are real business drivers as non-financial perspective becomes more and more important nowadays. Orbis stakeholders – from employees, through shareholders, business partners, analysts and clients, expect transparency and credibility to which we want to answer Orbis, together with its strategic partner and shareholder – AccorHotels, shares similar values and business standards.

That is why, the Management Board of Orbis S.A. took the decision to fully support, deploy and share within its community the AccorHotels Ethics and Corporate Social Responsibility Charter. We undertake this responsibility and engagement with real proud and confidence to be able to follow its principles. I am convinced that this document is not only a declaration of how a perfect company should look like but it gives very practical guidance on work and service attitudes, management behavior, cooperation principles and commitments in real day to day situations.

I am counting on your full support in bringing to life the AccorHotels Ethics and Corporate Social Responsibility Charter within the entire Group.

Gilles Clavie

President of the Management Board and CEO of Orbis S.A.



CHAIRMAN'S MESSAGE

More than just a global leader in the hotel industry, AccorHotels is a proudly diverse team of 180,000 inquisitive, motivated men and women working in a wide range of professions. Every year, we welcome millions of guests to our 3,800 hotels in more than 90 countries worldwide. This leadership gives us a number of rights, but it also comes with certain responsibilities, towards our employees, guests, partners and, naturally, our host communities around the world.

For more than 45 years, our Group has built a reputation as both a hospitality pioneer and an outstanding corporate citizen that expects employees and partners alike to meet the highest standards, in line with our proud tradition of corporate social responsibility.

Designed to encourage compliance with the most demanding ethical principles and to reaffirm our commitments, the Ethics and Corporate Social Responsibility Charter guides our responsibility process, covering the areas of management ethics, integrity and compliance, as well as corporate social responsibility.

At a time when our industry and our Group are undergoing extensive transformation, more than ever, we will continue to evolve and grow while remaining true to our common heritage. We'll do so by sharing the culture that sets us apart from the competition and makes us attractive, and also by expressing our vision of hospitality through the simplicity, warmth and universality of our "Feel Welcome" tagline.

Guest Passion, Sustainable Performance, Spirit of Conquest, Innovation, Trust and Respect are the values that form the foundation of our ethical commitment and express our unique personality.

We take considerable care to motivate and unite all of our teams around this shared philosophy, with a strong commitment to making them "Feel Valued".

I'm counting on each of you to promote this code of conduct in your decisions and daily practices so that in addition to delivering high performance, AccorHotels can continue to demonstrate the values that set us apart, make us strong and help forge our reputation. In this way, we will be able to drive our Group's sustainable growth and harmonious development forward for the benefit of all our stakeholders.

Sébastien Bazin
Chairman and Chief Executive Officer



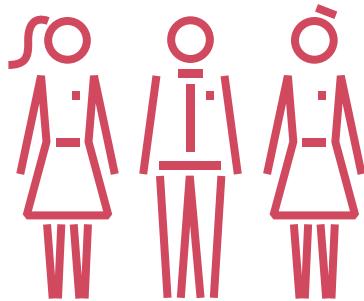
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6 CORE VALUES IN OUR CODE OF CONDUCT

Our values are embodied every day in our behavior, and in our relationships with all of our stakeholders, both inside and outside the organization. They guide our leadership methods and our actions and give meaning to our efforts, providing us with a universal frame of reference in a fast-changing world.

We are expected to understand these values, which are the bedrock of the Group's identity, and to embrace, express and share them to ensure that they are demonstrated by all employees. By setting the example, we each have an essential role to play in making these values a strong, living force in our corporate community.





GUEST PASSION

Hospitality is our trade, pleasing people is what drives us. Our guests are the driver of our decisions, of our actions. We put them first, we care for them. We go the extra mile for them. We enjoy doing it.

SUSTAINABLE PERFORMANCE

We stand for creating value, for as many as possible, over the long term.

SPRIT OF CONQUEST

Our guests are globetrotters, and so are we. We want to be where they want to be. We explore, we initiate, and we develop. We are ambitious for our guests. We make the impossible possible, we have fun doing it.

INNOVATION

We heard it was impossible, but together we did it. We stand for bringing guest's dreams to life. We dreamed it, we did it, they love it. We are curious, we welcome ideas. We are free to try, to test, to learn.

TRUST

We believe in natural kindness. We support and value each individual and acknowledge their value. We deliver on our commitments. We say what we do, we do what we say.

RESPECT

We are connected with the world, and to others. We enjoy the mix of cultures. We are proud of our differences. We put you first and we value you, whoever you are. We care for the planet.

Our values serve as our common “language” and generate a strong feeling of belonging. Across jobs, people, countries and cultures, they perpetuate and instill the sense of hospitality and service that nurtures our reputation around the world.

2

OUR COMMITMENTS AND RESPONSIBILITIES

2.1 FRAME OF REFERENCE

Accor's integrity is built on the diligent application of three closely related, interconnected principles.

UNDERSTAND THE LEGAL FRAMEWORK UNDERPINNING OUR ACTIONS

As globalization gradually gives companies more freedom to conduct their business, legislation and regulations governing their activities are becoming stricter and more far-reaching.

- Seven international conventions to combat cross-border corruption have been signed in recent years;
- The European Union is constantly reinforcing its procedures to prevent anti-competitive behavior;
- In response to the recent wave of massive business failures and fraud, authorities are increasingly diligent in enforcing financial management standards;
- Many countries now prosecute alleged cases of corporate harassment, discrimination and violations of privacy.

HEAVIER PENALTIES

The European Union and national jurisdictions have also introduced more severe financial penalties, with substantially higher fines for anti-competitive practices, bribery, insider trading, fraud and safety violations.

GREATER PUBLIC AWARENESS AND SENSITIVITY

Private citizens, employees and investors all roundly condemn companies that break the law. Citizens see this type of behavior as a serious moral offense that deserves public outcry and sometimes boycotts. For their part, employees of the accused company often refuse to be identified with behavior that they deplore. Lastly, investors punish illegal practices that could imperil the company.

MANAGERIAL RESPONSIBILITY

- Compliance with the law is non-negotiable.
- Everyone is expected to be familiar with the legal environment in which they exercise their responsibilities.
- The legal framework can be complex, and variations from one country to another may raise a wide range of issues that must always be resolved.
- Managers should instinctively share their concerns, discuss matters with their colleagues and seek guidance from the legal affairs department.





MEET OR EXCEED REGULATORY STANDARDS

Legislation governing corporate behavior and activities varies from one country to another. However, they are all intended to protect the stakeholders who put their trust in the company, such as shareholders, partners, suppliers

and subcontractors, employees or civil society as a whole. They also help to ensure access to superior services or products, that offer the best value for money and are as safe as possible for the consumer.

INTEGRATE OUR COMPLIANCE INTO A BROADER ETHICAL AGENDA

Compliance is more than a matter of obeying the law or facing legal punishment, it is also part of a company's ethical practices. Employees, guests, rating agencies, journalists, non-governmental organizations and other stakeholders expect us to express our ethical commitments and explain how we intend to honor them alongside all of our partners.

AccorHotels has pledged to uphold the ten fundamental principles of the United Nations Global Compact, which are universally accepted and, in certain countries, stricter than prevailing legislation. By embracing the United Nations Global Compact, we have reaffirmed our dedication to focusing our concerns clearly on people, employees, the environment and integrity.

In applying its ethical commitments, AccorHotels ensures compliance with the following fundamental documents:

- The principles of the 1948 Universal Declaration of Human Rights;
- The International Labour Organization's fundamental conventions;
- The OECD Guidelines for Multinational Enterprises issued by the Organization for Economic Cooperation and Development;
- The ten principles of the United Nations Global Compact.





2.2 CONDUCTING OUR BUSINESS

The laws governing our business operations enable us to develop them and drive sustainable growth by supporting fair competition that inspires us to do our best, to manage our operations diligently and transparently, and to constantly focus on safety and respect for people in every aspect of our business.

More than just compliance, for AccorHotels respecting the law means respecting our guests, our shareholders, our partners and our employees.

RESPECTING PEOPLE

There are many laws designed to protect a company's direct partners, such as customers, employees and suppliers, and sometimes people in indirect contact.

AccorHotels carefully tracks compliance with these laws, in particular by ensuring that the practices of our suppliers and service providers fulfill our commitments to respecting people. In the event of infringement, AccorHotels would immediately sever all relations with the supplier or service provider in question.

DISCRIMINATION

Discrimination, for the countries that have defined it, is when a person is treated unfairly on the basis of such criteria as ethic or national origin, gender, disability, skin color or religion in employment, career development, access to training and other areas governed by legislation.

Direct discrimination is when a person is treated less favorably than another with the same capabilities on the basis of discriminatory criteria.

Indirect discrimination is when an apparently neutral criteria or practice results in a particular disadvantage for one category of persons compared with another.

All forms of discrimination are banned by:

- The Universal Declaration of Human Rights;
- The 1966 International Convention on the Elimination of All Forms of Racial Discrimination;
- The 1990 Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

AccorHotels rejects all forms of discrimination. On the contrary, it is committed to encouraging cultural diversity by creating an environment where everyone enjoys the opportunity for personal and professional fulfillment.

FORCED LABOR

Forced labor is defined as any involuntary work or service exacted under the threat of a penalty.



The prohibition of forced labor is stipulated in article 4 of the Universal Declaration of Human Rights and is covered by an international convention signed in 1957 by the International Labor Organization (ILO), which is binding on all of the member states.

AccorHotels pledges to exercise extreme caution with regard to suppliers and service providers that might require people to work against their will or under threat of penalty. In the event of any infringement, AccorHotels would immediately sever all ties with the supplier or service provider in question.

CHILD LABOR

Child labor is defined as any form of economic activity performed by children that deprives them of their dignity and that is harmful to their normal physical and mental development.

In some of our host countries, child labor is still a common practice.

Child labor is regulated by several international conventions:

- The 1989 Convention on the Rights of the Child, which is intended to protect children by ensuring their right to education and healthcare;
- The Worst Forms of Child Labour Convention, signed by 173 countries and ratified by the ILO in 1999, which stipulates that the ratifying member states recognize children's right to be protected from economic exploitation and not to be required to do any work that might jeopardize their education;
- The 1966 United Nations International Covenant on Economic, Social and Cultural Rights, which states that children should be protected from economic and social exploitation.

AccorHotels pledges to:

- Comply strictly with the minimum legal working age in each host country and never employ a child under the age of 14 in any country;
- Be extremely vigilant when choosing suppliers or service providers;
- Refuse to work or immediately stop working with any supplier or service provider that violates child labor laws.

UNREPORTED LABOR

Unreported labor consists in employing an individual off the payroll without informing national tax and labor authorities.

While all countries require companies to officially report employee and payroll information to the tax and labor authorities, actual situations vary widely:

- In many countries, failure to report is a criminal offense;
- In the poorest nations, where the informal economy may be highly developed, compliance is rarely enforced, with the result that many employees work off the books without any real risk to their employers.

However, failing to report deprives employees of their social benefits and the government of revenue from payroll taxes.

AccorHotels pledges, never to use clandestine, undocumented or any other form of unreported labor in any host country.

PROSTITUTION, PROCURING AND PEDOPHILIA

Prostitution is the act of engaging in sexual relations in exchange for money.

Procuring (pimping) is the act of aiding a prostitute in arranging a sex act with a customer in exchange for money.

Pedophilia is an act of sexual abuse committed by an adult on a child.

The United Nations Convention of December 1949 for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others states in its preamble that "prostitution and the accompanying evil of the traffic in persons for the purpose of prostitution are incompatible with the dignity and worth of the human person."

While certain countries have banned prostitution, others tolerate it or authorize it under certain regulated conditions. However, most countries that tolerate prostitution outlaw procuring.

In many countries, it is a crime for a hotel operator knowingly to permit the premises to be used for the purposes of prostitution or to accept money in exchange for such permission.



In many countries, pedophilia is a criminal offense, as is the production, distribution or possession of pornographic images involving minors.

In a number of countries, including France, citizens are also liable to prosecution for acts of pedophilia committed in other jurisdictions.

AccorHotels pledges to:

- Ensure that its operations and premises cannot be used for the purposes of organized prostitution;
- Inform the appropriate authorities of any illicit activities involving prostitution;
- Be extremely vigilant that, in its operations, minors are protected from acts of pedophilia and that its premises are not used for procuring children for sexual purposes or for the production, distribution or storage of pornographic material involving minors.

EQUAL ACCESS

AccorHotels is committed to ensuring equal access to all the services provided to the public and actively encourages diversity and outreach in the job opportunities offered to employees.

AccorHotels pledges to:

- Recognize the cultural, religious and individual diversity of its guests and employees. We are committed to eliminating all possible sources of discrimination in our facilities, equipment and buildings, as well as in our practices, procedures and hotel management processes;
- Ensure, in compliance with prevailing legislation and standards, that guests and employees can access and use, to the best of their ability, the equipment and facilities that its hotels provide, use or operate.





BUSINESS ETHICS

Some laws governing business practices are specifically designed to protect consumers, private citizens and other economic stakeholders.

RESPECTING COMPETITION RULES

Competition rules restrict anti-competitive behavior in two ways, by prohibiting:

- Collusion between one or several competitors, suppliers or retailers, in particular to fix prices or divide up the market;
- The abuse of a dominant position to create obstacles to fair competition.

Most countries have passed legislation prohibiting anti-competitive practices.

In the European Union, companies are expected to comply with the competition provisions in the Treaty of Rome, which are designed to ensure that competition in the common market is not distorted.

More generally, measures to combat anti-competitive practices and promote international cooperation are being steadily expanded and strengthened.

Today, in almost any country, a company may be investigated, its executives interrogated or its premises searched at the request of foreign or transnational authorities.

AccorHotels has prepared a [Competition Law Compliance Guide](#) that employees may download from the corporate intranet.

AccorHotels pledges to comply strictly with competition rules in every host country, in full awareness that the fewer the competitors, the greater the risk.

Example: *By chance, the chief executive officer of one of our competitors is an old friend. Rather than start a price war, which neither of us thinks would be very efficient, we decide to agree on prices while keeping them close to the market average to avoid any accusations of collusion. Is this illegal?*

> Anything that is intended to distort competition is illegal, even a simple discussion about prices with competitors.

COMBATTING BRIBERY OF PUBLIC OFFICIALS

Bribing a civil servant, elected official or other government employee consists of promising or giving him or her an inducement to act, or not to act as the case may be, in violation of his or her official duties.

Bribing a public official is illegal in every country.

In the United States, the Foreign Corrupt Practices Act (FCPA) makes it unlawful for a US company or foreign company with operations in the United States to bribe a foreign official.

In the United Kingdom, the Bribery Act 2010 criminalizes any form of bribery of a public official or private individual by a company with business in the country.

In France, it is a criminal offense for a French company, one of its subsidiaries or one of its consultants to bribe a foreign official. Every year, AccorHotels responds to the questionnaire issued by France's Central Service for the Prevention of Corruption (SCPC, attached to the Ministry of Justice) concerning the practices and programs deployed during the year.



AccorHotels pledges that no commission will be paid directly or indirectly to any elected or appointed public official with regard to its contracts or its relations with French or foreign government agencies.

Example: *Following a tax audit, we receive a reassessment notice, which both we and our certified public accountant feel is unjustified. Moreover, the reassessment plus the fine amount to a full two years of revenue. In this very poor country, tax inspectors sometimes do this in hopes of being offered cash compensation in exchange for forgetting about the fine. And in fact, the requested payment is not very much. What should I do?*

> By paying the compensation, both you and AccorHotels could be prosecuted, notably under French law, for the criminal offense of bribing a foreign official. Clearly, this is a case of attempted extortion. The legal department will assist you in exploring every possible way of settling your tax dispute to Accor's advantage.

BRIBERY OF PRIVATE INDIVIDUALS

There are two types of bribery involving private individuals:

- **Active bribery** consists of promising or giving a person other than a public official an inducement to act in violation of his or her professional obligations;
- **Passive bribery** is when a person other than a public official has solicited or accepted an inducement to act, or not act as the case may be, in violation of his or her professional obligations.

Any attempt at bribery by a French company or one of its subsidiaries is liable to prosecution, regardless of where it was committed.

AccorHotels pledges to take every measure to avoid any form of bribery with regard to both its procurement and sales procedures.

Example: *I found out that a large European company is planning to hold its annual convention in one of our host regions, the Horn of Africa. The contract would involve accommodating three hundred people over two days,*

in the middle of the low season. Our hotel, which is ideally situated, would be the perfect venue for this type of event. I contacted the convention organizer, who said that he'd like to come for a week with his assistant, accompanied by their respective spouses. I would like to make their stay as pleasant as possible. What can I do?

> Naturally, they are welcome to stay in the hotel, but you should avoid offering the organizer any extras that may be construed as a bribe to win the contract with his company. For example, you could offer each of them a double room free of charge but only for the two or three days needed to show them the hotel facilities and introduce them to possible event service providers. On the other hand, they should pay for their spouses' expenses (spa, golf course, safari, etc.). Obviously, you cannot agree to pay for their airline tickets. As a precautionary measure, you could send them a form, to be signed and returned, that clearly states the amenities and services included (or not) in your invitation and a tentative schedule of meetings, visits, introductions to service providers, etc.

MONEY LAUNDERING AND COMPLICITY IN MONEY LAUNDERING

Money laundering is a crime that consists of holding or using funds that come from illegal activities, such as drug trafficking or bribery.

AccorHotels is preventing and combating money laundering by complying with legislation and international conventions:

- The United Nations Convention against Transnational Organized Crime, which defines the international framework for combating money laundering;
- The Financial Action Task Force, an inter-governmental body that promotes international cooperation, whose member states (including France) are required to set up a financial reporting system to support the fight against money laundering.



Financial organizations are subject to strict requirements with regard to the identification and reporting of funds from suspected money-laundering transactions.

Non-financial companies may also be guilty of abetting money laundering if they sell goods or services in exchange for tainted funds.

AccorHotels pledges to be extremely attentive to funds suspected of coming from or being intended for a criminal activity. Compliance audits are conducted as necessary.

GIFTS

AccorHotels prevents accusations of bribery and conflicts of interest by refusing any gifts or personal benefits.

The only exceptions are the inexpensive gifts or invitations that may be exchanged as part of a high-quality business relationship when no negotiations or tender offers are in progress. For example, as part of their professional responsibilities, employees may offer or accept non-cash or reasonably priced gifts or personal advantages, in particular for promotional purposes.

In the same way, AccorHotels employees may occasionally offer or accept invitations to trade events in strict relation to their activities in the Group.

In case of doubt, employees should discuss the matter with their manager.

AccorHotels has issued a [gifts policy](#) for all employees to ensure that guidelines are clearly understood.

POLITICAL ACTIVITIES

AccorHotels does not support any political party in any host country.

Employees who participate in a political activity do so solely as individuals, on their own time, and in no way as representatives of Accor.

They should take the appropriate steps to avoid any conflict of interest between such activities and their responsibilities at Accor. Under no circumstances does AccorHotels offer any form of permanent or temporary compensation to public policy makers.

LOBBYING

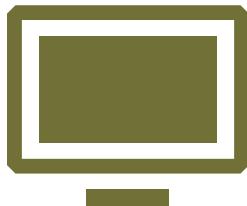
Lobbying constructively and transparently assists public policy makers in discussing, shaping and promulgating public policy on issues that have an impact on our business activities.

AccorHotels pledges to:

- Express its position on issues of public interest having an impact on its business activities to public authorities, either in its own name or as part of trade associations;
- Defend its legitimate interests, taking care to ascertain the validity of its arguments;
- Avoid seeking an undue political or regulatory advantage;
- Demonstrate integrity and intellectual honesty in all of its relations with public officials and organizations, regardless of the circumstances or interests being defended.

More generally, our lobbying activities are conducted in line with our strategic action principles and corporate social responsibility policies





PROTECTING PROPERTY AND DATA

A number of laws governing company procedures are specifically intended to protect the interests of stakeholders, particularly shareholders and employees.

INSIDER TRADING

Insider trading consists of disclosing or using for personal gain (in particular through the purchase or sale of company stock or the exercise of company stock options) sensitive, confidential information known only to people inside the company that, if disclosed, could have a material impact on the company's share price. The disclosure and use of such information that Group employees may obtain through the exercise of their professional activities or otherwise is a criminal offense liable to prosecution. Insider trading is also regulated and punishable by market authorities where the company's stock is listed.

AccorHotels pledges to ensure strict compliance with market regulations applicable to employees who may have access to insider information.

MISUSE OF COMPANY ASSETS

Misuse of company assets involves deliberately using the company's property or credit or the powers of its officers for private gain.

The concept of misuse of company funds may be found in a variety of legislation, although its definition and description may vary from one country to another. In France, such misuse is a criminal offense liable to prosecution.

AccorHotels pledges to apply the strictest definition of misuse in every subsidiary and take all means necessary to prevent and detect any infringements.

CONFLICT OF INTEREST

Any personal interest held by employees, their family members or their friends in Accor's partners or competitors may give rise to conflicts of interest detrimental to the company's proper operation.

AccorHotels has introduced guidelines and procedures for disclosure of any form of potentially conflicting interests.

In particular, since 2010 senior executives have been prohibited from acquiring any form of equity interest in a company that owns any hotels franchised or managed under an AccorHotels brand.

AccorHotels requires all employees to disclose any situation in which a supplier is dependent on the Group. Employees may never use, either directly or indirectly, their professional position to derive personal gain or offer an advantage to a third party in any way that would be detrimental to the Group's interests.

FRAUD

Fraud is act of deliberate deception, generally involving, in the case of companies, the filing of forged, false and/or incomplete reports or documents with the intention of unfairly collecting or avoiding the payment of funds.

Accounting, tax and customs laws and standards may vary from one country to another.

In addition, foreign subsidiaries of listed companies must comply with the accounting and tax legislation and standards in the country of listing.

Following a number of large fraud-related corporate failures, legislation has been tightened and controls have become more thorough.

AccorHotels pledges to:

- Fully comply with prevailing legislation and standards in each host country, especially in the areas of accounting, taxation and customs;
- Meet all of the obligations of a company headquartered and listed in France;
- Take all necessary measures to ensure that business and financial transactions are properly recorded in its financial statements and kept in such a way that they may be audited in accordance with legislation.

PERSONAL DATA PROTECTIONS

The protection of personal data i) involves restricting access to any information (such as a name, telephone number, email-address or credit card number) that would enable a person to be directly or indirectly identified and ii) defining the conditions in which such data may be collected and processed.

This information is protected by a variety of legal measures governing the right to privacy, such as France's Freedom of Information Act of 1978, the European Union's Data Protection Directive (95/46/EC) and the Council of Europe's Convention 108 on the protection of personal data, as well as by legislation passed in many countries around the world, such as Australia and Brazil.

AccorHotels has introduced a personal data protection charter that may be downloaded from its websites.

Example: *In our host country, an exceptionally powerful monsoon caused serious flooding and left hundreds of thousands of people homeless. My wife is the head of the local office of an accredited French humanitarian NGO. I know that the hotel's usual customers, who are very upset by the catastrophe, would be willing to help the community. Can we use the customer database to contact them for donations?*

> That's very generous of you, but the laws governing the use of computer data are very strict. In particular, customer information may never be used for any purpose other than business. However, you can contact headquarters to explore the most effective way to assist the victims.

INFORMATION SYSTEM SECURITY

Keeping information systems secure requires managing informational risks at every level of the enterprise, in such aspects as secure data access and dedicated facilities, administrator access permissions, training in informational risk awareness and security audits and tests at our partners.

AccorHotels pledges to:

- Introduce a dedicated information systems security organization;
- Define guidelines for using information systems across the enterprise and maximize uptime for the most critical systems;
- Provide regular training for key persons;
- Integrate security into the life cycle management of IT applications;
- Implement technological solutions designed to protect the personal data of guests and employees.

INTELLECTUAL PROPERTY

Intellectual property comprises the rights to such intangible assets as brands, domain names, designs and models, patents, expertise and copyrights.

Infringing these rights is an offense liable to prosecution, in particular for counterfeiting or unfair competition.



AccorHotels pledges to:

- Protect and defend its own intellectual property rights;
- Consistently respect the intellectual property rights of its employees, partners and, more generally, any third parties.

PROTECTING OUR CORPORATE IMAGE AND REPUTATION

Personality rights refer to the rights of individuals to control the use of their name, image, likeness, or other aspects of their private lives, honor and reputation. Like individuals, companies have the right to protect their reputation and are authorized, when necessary, to bring suit for defamation or disparagement.

AccorHotels pays careful attention to:

- Obtain personal authorization before using any photograph, video or other media representing an employee or person from outside the Group or containing their name or any other attribute of their personality;
- What employees post on social networks concerning issues directly or indirectly related to the Group, its brands, its hotels or its businesses, so as to ensure that they do not disclose any information that is confidential and/or potentially detrimental to our reputation. In this regard, the Social Media Charter defines guidelines that employees are expected to follow in posting on social networks.



2.3 STAKEHOLDER RELATIONS

Economic globalization represents a fantastic growth opportunity that is also broadening our responsibilities in ways that we fully embrace. As a global enterprise and standard-setting employer, AccorHotels has the duty to demonstrate outstanding performance in the areas of employee relations, social responsibility and the environment.

Our challenge is to reconcile business development with an abiding respect for the Earth and its inhabitants. In response, in April 2012, we launched the innovative PLANET 21 sustainable development program that is broadening and deepening the actions that have been underway for more than ten years. It is structured around seven pillars and 21 objectives that embody our commitment to sharing our values.

STAKEHOLDER DIALOGUE

Deployment of Accor's corporate social responsibility process is being supported by ongoing dialogue with all stakeholders, including guests, employees, business partners, franchisees, hotel owner/investors and agents of local development. Discussions with stakeholders play a critical role in identifying priority areas for action, thereby helping to create shared value.

The PLANET 21 program attests to our determination to align our practices with the priority expectations of our stakeholders.

AccorHotels believes that it is essential to regularly consult with stakeholders, both inside and outside the organization, individually or collectively, in order to understand their primary expectations and concerns regarding the Group and to respond with appropriate actions when our interests converge.

AccorHotels pledges to:

- Nurture regular dialogue with its various stakeholders as part of a continuous improvement process, by combining transparency and performance, in every host country and at every level of the organization (hotel, country, brand, headquarters);
- Build awareness of its CSR process among franchisees and owner/investors;
- Enable every stakeholder to access the public complaints resolution systems;
- Recognize the position of certain stakeholders, such as trade organizations and federations, NGOs and international organizations, in issues that concern them.

Particular attention is paid to stakeholder concerns during hotel openings (which occur once every two days on average around the world), during changes in hotel operating structure, and in countries and regions where AccorHotels plays an important role in the development of the local economy and tourist industry.





OUR EMPLOYEES

DIALOGUE

The dialogue process comprises a set of procedures designed to structure the exchange of information, discussion, consultation, mediation and negotiation, during which the interests of each party are protected.

Social dialogue is a core factor in preserving harmony among members of the corporate community. It helps to constantly build consensus, thereby playing an essential role in defusing labor unrest.

Encouraging dialogue provides a clearer understanding of front-line issues and gives everyone an opportunity to express his or her opinion.

Our dialogue policies are implemented by managers, who foster the exchange of ideas with employees, in particular by organizing round-tables and other dedicated dialogue events.

To support local, hands-on management, AccorHotels has deployed objective, high value-added measurement tools, such as opinion surveys and the Local Climate and Personal Initiative (CLIP) questionnaire, to assess the workplace environment and take corrective action in the event of dissatisfaction.

AccorHotels pledges to ensure the transparency of its employee communication by:

- Systematically conducting an annual performance review with every employee;
- Keeping each employee clearly informed of his or her rights, duties and benefits;
- Publishing information media adapted to the local environment, in particular by translating internal documents;
- Understanding the impact of change on people when undertaking reorganization or restructuring projects.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Freedom of association and the right to collective bargaining enable employees to establish and join organizations of their own choosing, with the goal of collectively expressing their point of view and defending their interests in the company.

The right to collective bargaining and the role of employee representative organizations have been recognized by:

- The International Labor Organization;
- The 1966 International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The framework agreement signed in 1995 between AccorHotels and the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF).

While protected in most countries, freedom of association and the right to collective bargaining is still sometimes legally restricted in certain regions.

AccorHotels pledges to:

- Ensure compliance with locally applicable legislation governing the freedom of association of its employees;
- Avoid hindering or obstructing the process of creating an employee representative organization;
- Respect the timetable for consulting stakeholders and employee representatives, particularly in the event of reorganizations or disciplinary procedures;



- Ensure that employees can express themselves freely within the company on issues related to the conditions in which they carry out their duties.

VALUING AND RESPECTING DIVERSITY

For a company, diversity designates the variety of individual backgrounds found among its employees, based on such factors as country, region or neighborhood of origin, family name, culture, age, gender, physical appearance, disability, sexual orientation, education and more. When applied to management, this translates into the recognition and celebration of individual differences as a valuable source of higher performance for the company.

In terms of organization, diversity influences all of the procedures and processes implemented by the company to ensure equal opportunity and prevent discrimination. Resources have been deployed to support our Diversity Commitment (downloadable from the corporate human resources intranet).

More than commitments and resources, however, respect for diversity is primarily a personal issue. It is therefore up to each of us to improve our practices to drive superior performance for the entire organization.

NON-DISCRIMINATORY, TRANSPARENT HIRING POLICIES

Because of the structure of our businesses, the AccorHotels hiring process is completely decentralized, which means that the managers in charge of hiring must consistently embrace our professional standards and methodological guidelines. These are applied prior to recruitment and hiring, thereby enhancing efficiency while guaranteeing fairness in compliance with prevailing legislation.

It is prohibited to hire or reject anyone on the basis of non-professional criteria, such as religion, age, gender, political opinions, ethnic origin or union membership*.

AccorHotels pledges to:

- Comply with a selection process that applies the same criteria to every applicant for a given position;
- Base all hiring decisions exclusively on professional skills and personal qualities, in line with our needs and the applicant's own attributes.

Sensitivity training is essential if we want to reduce the stereotyping that fuels discrimination. The working environment, past experience and subconscious expectations can influence the way we feel about a candidate and the questions we ask him or her.

However, many questions should not be asked because they carry a direct risk of being accused of discrimination in countries that consider these questions to be discriminatory.

Example: We know that age and experience are not systematically correlated. A candidate can be over 45 and still be a beginner in a position, with corresponding compensation. In the same way, there is not necessarily a link between age and a person's dedication or motivation.

- > Questions that should not be asked during a hiring interview:
 - How old are you?
 - When were you born?
 - We have a very young team. Do you think you can fit in?

Questions that may be asked:

- How long have you been in this job?
- How many years of experience do you have in a similar job?
- Which skills and capabilities did you acquire during your previous job experience that could be useful in this new position?

* Except in some countries like Saudi Arabia, where local legislation requires us to apply certain criteria in hiring.



COMBATING MORAL AND SEXUAL HARASSMENT

Moral or sexual harassment is characterized by repeated, hostile conduct, verbal comments and actions that impugn the employee's dignity and integrity.

Moral or sexual harassment is an infringement of:

- Article 5 of the Universal Declaration of Human Rights, which states that "No one shall be subjected to cruel, inhuman or degrading treatment or punishment";
- Specific legislation adopted in many countries, which may require the employer to take steps to prevent or stop any actions that may be construed as moral and sexual harassment.

AccorHotels tolerates no form of moral or sexual harassment. Every manager is expected to alert the Human Resources Department, which is ready to deploy the resources needed to stop any reported cases of moral or sexual harassment.

Example: : *One of my female colleagues confided to me that she feels harassed by her manager. However, she has a strong personality and it seems to me that she has enough authority and the capability to defend herself. Should I get involved anyway?*

> Yes. Harassment can cause distress and make even someone in authority feel vulnerable. You should alert your HR Department, which will take the necessary measures.

HEALTH, SAFETY AND WORKING CONDITIONS

Maintaining a healthy workplace is primarily the responsibility of local managers, because they are ones who have to manage risks, respond to incidents and implement action plans as needed.

Analyses must be performed upstream so as to foresee and attenuate the short and long-term risks associated with each job or activity. Whenever possible, physical stress and strains should be avoided and appropriate training offered.

AccorHotels pledges to:

- Identify and assess the short and long-term risks associated with each activity, department or workstation;
- Offer appropriate training and resources to reduce the number of workplace accidents and cases of occupational and other illnesses. These include training in healthfulness and well-being, in such areas as preventing HIV-AIDS and chronic diseases, nutrition, psychosocial risks and first aid;
- Foresee and manage the impact on people of changes in the workplace environment;
- Pay attention to psychosocial risks and apply appropriate methods to manage them.

WORK-LIFE BALANCE

Enabling employees to enjoy a harmonious balance between work and their personal lives is a highly effective way to attenuate psychosocial stress by improving their well-being, the quality of their worklife and, with it, the quality of their work.

AccorHotels pledges to:

- Respect important life events, such as births, weddings, vacations or the death of loved ones;
- Minimize unforeseen situations in short-term work schedules, to ease the constraints of a hotel's atypical working hours. This involves distributing schedules ahead of time, planning set and rotating schedules to allocate time-off equitably, etc;
- Offer a workable solution, whenever the job permits, to employees who encounter commuting difficulties.



REWARDING PERFORMANCE

Performance is driven by a sense of engagement, for employees, and by alignment around a shared objective, for teams.

In both cases, it is monetized according to the criteria for determining variable pay.

AccorHotels pledges to:

- Offer compensation that is competitive in each market and country;
- Compensate employees fairly and incentively to reward their personal and team performance.

TRAINING AND CAREER SUPPORT

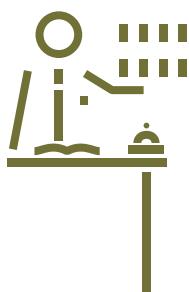
Employee training is a key factor in ensuring the delivery of superior service.

More than just addressing these core business challenges, AccorHotels is committed to offering employees opportunities for career development and continuous skills enhancement in order to improve everyone's employability.

A variety of inter-brand and inter-country mobility gateways are helping to anchor our management innovation and globalization policy, while supporting employees in their career development with our resources, with a focus on promoting from within and encouraging cross-border or local job transfers.

AccorHotels pledges to:

- Onboard new employees and train them to be ambassadors of the Group and its values;
- Offer training programs aligned with the needs of the company, with an emphasis on the hospitality skills and jobs of tomorrow;
- Give everyone a chance to take on new responsibilities and move up the social ladder thanks to his or her new capabilities;
- Nurture and develop everyone's employability.



OUR GUESTS

SAFETY AND FOOD HYGIENE

Regardless of the hotel, brand, location or country, safety is one of the fundamental principles of the hospitality business. Safety is also a matter of complying with local legislation and standards, as well as Accor's rules and guidelines.

AccorHotels pledges to welcome its guests in the most efficient and pleasant way possible. To minimize any risks to guest safety, we have introduced:

- Modern fire prevention engineering methods based on four performance criteria:

- limit the risk of a fire starting, limit the risk of fire and smoke spreading, enable the evacuation of all persons at risk and enable emergency services to respond quickly and efficiently;
- Standards to prevent the development and spread of legionella bacteria in our hotels, with samples analyzed by certified laboratories;
- Policies to internally track food safety and hygiene in all of our restaurants, with inspections by certified companies.

SECURITY

Security consists in preventing and responding to malicious attacks on people and property and fighting against hotel crime, which could potentially threaten our guests, employees and infrastructure. It is the shared responsibility of the Group, the country organization and the hotels. Hotel security is a defining component in our product and service solutions, as well as one of the most important expectations of our guests.

- AccorHotels pledges** to make the security of guests and employees in its hotels, offices and other facilities a top priority by:
- Constantly tracking and analyzing the security situation in existing or potential host countries and cities;
 - Defining security recommendations based on the installations, equipment, technologies and security procedures to be implemented;
 - Providing security resources and recommendations aligned with the specific features of each hotel segment (economy, midscale, luxury);
 - Ensuring that hotel security incidents are reported to the country headquarters and, when the Group may be exposed to liability, to corporate headquarters;
 - Auditing hotel security measures and providing advice and training to employees to continuously improve our protection systems.

Suitable management programs may be deployed in regions exposed to high security risks or specific criminal threats.

These purpose-designed responses are built around targeted sensitivity training, security resources aligned with detected threats, and dedicated assistance during guest or employee stays or when country managers request operational support in the event of the most serious breaches.

HEALTH AND NUTRITION

Food and nutrition are major challenges for Accor. Today, nutrition is the focus of public health campaigns to reduce the risks of cancer, cardiovascular diseases, diabetes, obesity and other health problems.

AccorHotels pledges to promote a balanced diet by:

- Developing resources and solutions to create responsible menus, based on balanced nutrition, organic products, etc;
- Providing customers with clear information and enabling them to eat balanced dishes in our hotel restaurants.

RESPONSIBLE MARKETING AND ADVERTISING

Responsible communication practices have to be built into advertising initiatives to ensure that the services, relationship and solutions are transparently presented and that guests are protected from misleading information. These practices cover all forms of communication to avoid any accusation of greenwashing*.

* Communication that gives the perception that an organization is more environmentally responsible than it really is.



AccorHotels pledges to:

- Ensure that all advertising is responsible by deploying a pre-release validation process and taking environmental impacts into account when selecting media and collateral;
- Act and communicate transparently, in particular in guaranteeing price transparency for guests.

In 2009, AccorHotels signed the UDA [Charter on Responsible Communication](#), prepared by the French advertisers' association's sustainable development steering committee.

OUR SHAREHOLDERS, INVESTORS AND PARTNERS

In addition to the meetings organized for the release of our annual results and the Annual Shareholders' Meeting, AccorHotels is committed to communicating with members of the business and financial community as responsibly and as transparently as possible. This process tends to focus on institutional equity investors, financial analysts, shareholders and financial market regulators.

AccorHotels pledges to:

- Create a relationship of trust with the market by acting as a source of reliable, meaningful investor information;
- Nurture dialogue with individual shareholders through an investor relations working group and a Shareholders Club;
- Organize events and hotel visits to enable institutional investors to meet with line managers and gain a better understanding of our management practices and processes.

OUR SUPPLIERS AND SERVICE PROVIDERS

AccorHotels pays careful attention to instilling its sustainable development commitments across the entire supply chain, in particular through the [Procurement Charter](#) 21 that shares our employee relations, social responsibility and environmental commitments with suppliers.

Employees are expected to verify that suppliers have signed the Charter and that their subcontractors comply with the same standards. Suppliers also have to agree to participate in the sustainable development performance review and authorize AccorHotels to conduct audits.

Any supplier that is unable to meet certain of these requirements must inform AccorHotels so that an agreement can be reached on the corrective and preventive measures to be taken and the timetable for implementing them. Failure to comply with any of the criteria may result in the termination of business dealings with the supplier in question.

AccorHotels buyers are expected to perform their duties in accordance with AccorHotels commitments to its stakeholders and in compliance with prevailing legislation and standards in each host country, particularly as concerns competition rules.



TRANSPARENCY, COMMUNICATION AND FAIRNESS

AccorHotels pledges to:

- Ensure that tenders, certifications and contracts are awarded following a transparent, equitable process based on objective criteria and that suppliers are treated with fairness and honesty;
- Provide regular, responsive, clear communication that offers everyone the same degree of information;
- Individually inform the selected and rejected suppliers.

WORKING CONDITIONS AND RESPECT FOR PEOPLE

Accor's commitments under the United Nations Global Compact also concern its broader employment footprint and consequently the indirect jobs created by its business. This commitment, which stems from our ethical integrity, may have a major impact on the image of the Group and its brands.

AccorHotels pledges to:

- Pay careful attention to any employment practices in conflict with its values and human rights commitments, such as forced labor, child labor, discrimination and hazardous and/or degrading working conditions;
- Immediately sever all ties with any supplier relying on such practices.

LABOR-ONLY SUBCONTRACTING

AccorHotels pledges to:

- Respect, in general, the rights of workers and ensure that they are not infringed by its service providers and suppliers;
- Avoid, in particular, the use of labor supplied by contractors unless specifically authorized by law.

RESPONSIBLE SUPPLY CHAIN

For its priority inputs, AccorHotels is committed, whenever possible, to deploying solutions that offer better environmental or social responsibility performance while complying with budgetary and technological specifications.

ECONOMIC DEPENDENCY

AccorHotels and its suppliers consistently strive to avoid any excessive dependency. When, despite all our efforts, such dependency develops, AccorHotels and the supplier attempt to diversify, to the extent possible, their supplier/customer base. AccorHotels encourages free markets.

SUSTAINABLE RELATIONS

AccorHotels is committed to supporting responsible, sustainable relations with its suppliers and to dedicating part of its sourcing to small and mid-sized companies.

In France, for example, around 45% of certified suppliers have been under contract for at least five years. In the same way, nearly three quarters of suppliers are very small, small or mid-sized companies.



COMMUNITY RELATIONS

As a responsible enterprise, AccorHotels is committed to launching, encouraging and federating initiatives designed to support the economic and social development of its host communities.

LOCAL DEVELOPMENT

Firmly rooted in its local communities, AccorHotels contributes to their economic development through its direct and indirect jobs and protects their most precious, most vulnerable assets, including their children, cultural heritage and natural ecosystems.

AccorHotels pledges to:

- Promote the hiring of local hotel staff;
- Offer training programs to develop the skills and employability of local employees who have not initially been prepared for our jobs;
- Promote the culture, architectural heritage and cuisine of our host communities;
- Help fight against poverty through our business agreements, for example by offering fair trade products whenever possible;
- Encourage hotels to purchase and promote local products;
- Support partnerships and ties with the local communities.

COMMUNITY OUTREACH

AccorHotels demonstrates its hospitality of the heart by supporting public interest projects led by its employees in every host country.

AccorHotels pledges, in particular through its Solidarity AccorHotels endowment fund, to support the development of individuals and their integration into the community by:

- Encouraging employees to get involved in community outreach initiatives;

- Supporting NGOs or local associations that help people out of social ties, people living in precarious conditions or victims of natural disasters;
- Encouraging the empowerment of these people by deploying project models that are economically viable over the medium term.

PROTECTING CHILDREN

Sexual tourism and violence against children crosses geographic, social and cultural borders. As the world's leading hotel operator, AccorHotels has a moral obligation to protect children from abuse, in particular through the partnership with ECPAT*.

AccorHotels pledges to:

- Train and inform employees and guests in protecting children from abuse by:
 - Training a large number of employees, in particular in detecting and reporting suspected cases;
 - Raising guest awareness in the hotels.
- Ensure that these policies are applied by:
 - Signing and pledging to enforce in a maximum number of countries the principles of the Code of Conduct published by ECPAT and the World Tourism Organization;
 - Integrating suppliers and partners into the process;
 - Reporting to the appropriate authorities any suspected cases of sexual tourism involving children.

* Since 2001, AccorHotels has fought against the commercial sexual exploitation of children with ECPAT International, an NGO whose mission is to end child prostitution, child pornography and trafficking of children for sexual purposes.





THE ENVIRONMENT

As a responsible enterprise, we demonstrate our commitment to growing our businesses while respecting the planet by reducing our environmental footprint. Our global presence offers the opportunity to impel our business lines towards more environmentally sensitive solutions.

ENVIRONMENTAL MANAGEMENT

Our environmental strategy is based on a Group-wide environmental footprint study and supported by a management system designed to effectively address our main environmental challenges both in building and in operating our hotels.

AccorHotels pledges to:

- Define Group-wide environmental performance improvement objectives, deploy them and track progress towards meeting them with appropriate indicators and environmental management and control systems;
- Introduce disciplined environmental management processes by deploying sustainable construction and refurbishment guidelines for new hotel projects.

Certain Group brands have made the additional commitment to encourage their member hotels to seek ISO 14001 environmental certification.

RAISING GUEST AWARENESS AND TRAINING EMPLOYEES

Raising awareness and sensitivity on a daily basis is a core component of environmental stewardship. We need to educate our guests in ways that encourage them to support hotel programs. As the keystone of our sustainable development policies, employees are

expected to act as ambassadors by setting the example in respecting the environment every day and by promoting our stewardship process.

AccorHotels pledges to continuously train employees and enhance the environmental sensitivity of both employees and guests by:

- Developing and deploying employee training and awareness building resources;
- Installing in-hotel signage to educate guests and raise their sensitivity.

CONSERVING NATURAL RESOURCES

Energy and carbon footprint

In addition to representing a major expense, hotel energy use ranks among our leading environmental impacts. More generally, the tourist industry is particularly exposed to the risks of climate change.

AccorHotels pledges to:

- Manage hotel energy use and reduce the related carbon emissions by regularly tracking energy performance and implementing energy saving action plans;
- Promote renewable energies by installing such facilities whenever feasible in new or refurbished hotels, depending on regional suitability, and by helping to identify technologies capable of reducing our energy and climate footprint.

Water

AccorHotels directly uses a great deal of water and sometimes operates in water-stressed regions. As a result, conserving water is a major concern for the Group, especially when indirect use, particularly in upstream farming operations, is taken into account.



AccorHotels pledges to:

- Conserve water resources by regularly tracking use, deploying water-saving programs and equipment and implementing agroforestry projects to improve the performance of local upstream farming operations;
- Pay careful attention to managing water use at hotels located in water-stressed regions.

Pollution and discharges

Accor's operations may result in direct or indirect pollution. The quality of groundwater may be impacted by the organic matter or chemicals discharged in hotel wastewater. Managing our operations may also occasionally give rise to noise, unsightliness, odors and other disamenities.

AccorHotels pledges to:

- Manage the impact of its waste water effluent by:
 - Guaranteeing that wastewater is systematically treated for every hotel;
 - Focusing on the use of eco-labeled cleaning, upkeep, groundskeeping and other products, which limit the chemical content of effluent and other discharges;
 - Focusing on environmentally-aware suppliers, particularly of laundry services;
- Implement environmentally sensitive practices, in particular by limiting odors, unsightliness, noise and other disamenities.

Waste and recycling

Waste produced by our hotel operations comes from foodstuffs, complimentary products and other operating inputs, as well as from guest activities. A significant volume of waste is also generated by hotel construction or refurbishment projects.

AccorHotels pledges to:

- Reduce the quantity of raw materials used by limiting packaging and focusing on recycled and/or recyclable materials;
- Increasing the proportion of sorted and recycled hotel waste by:
 - Introducing sorting processes for the main categories of waste produced by our operations;
 - Offering solutions that allow hotels to enable guests to sort their waste;
 - Systematically eliminating hazardous hotel waste using appropriate processes.

Biodiversity

Biodiversity may be harmed at every stage in a hotel's lifecycle, during greenfield construction, during such operating activities as groundskeeping and inputs procurement, or more generally when travelling guests visit a nature preserve. AccorHotels is committed to limiting these impacts and is helping to enhance ecosystems through its Plant for the Planet reforestation program.



AccorHotels pledges to:

- Integrate hotels into their eco-system by designing the preservation of biodiversity into every new project;
- Promote programs to protect biodiversity in each hotel, its ecosystem and its supply chain by:
 - Raising employee and guest awareness of biodiversity issues;
 - Changing our procurement practices, notably as concerns foodstuffs (refusing to put endangered species on menus, choosing organic products, etc.) or the choice of sustainable materials and products (e.g. wood from sustainably managed forests);
 - Promoting garden, lawn and farmland management practices that limit the use of chemicals.



3

APPLICATION PROCEDURES

3.1 DISTRIBUTING THE CHARTER

This Charter has been distributed to General Managers of owned or managed hotels and to senior Group executives, who promote its values and commitments to their teams and carefully track its application.

The Charter is also available on the various Group intranets, so that every employee may consult it as needed.

Moreover it is sent to our franchisee and owner partners, so that they can embrace the values that we demonstrate every day.

Lastly, it is released to the public on the accor.com website.

3.2 REPORTING PROCESS

Employees may contact their manager for additional information or guidance about the values and principles presented in this Ethics and Corporate Social Responsibility Charter.

If they have a question about a specific situation, they may speak to their direct manager or contact the human resources or legal affairs department in their country.



4

GLOSSARY

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