



## La Posada Providencia's CONFLICT OF INTEREST POLICY

All La Posada Providencia employees are expected to exhibit and promote the highest standards of honest and ethical conduct in all dealings relating to the business of the Company. That means that, in working for La Posada Providencia (“the Company”), employees are expected to act solely in the interest of La Posada Providencia and not in their personal interests or in the interests of others. In other words, La Posada Providencia employees are expected to use good judgment, adhere to high ethical standards, and avoid situations that create an actual or perceived conflict between their personal interests and those of the Company. La Posada Providencia expects that the transactions employees participate in are ethical and within the law, both in letter and in spirit.

La Posada Providencia recognizes and respects individual employees’ right to engage in activities outside of his or her employment that are private in nature and do not in any way conflict with or reflect poorly on the Company. Management reserves the right, however, to determine when an employee’s activities represent a conflict with the company’s interests and to take whatever action is necessary to resolve the situation, including terminating the employee.

Exactly what constitutes a conflict of interest or unethical business practice is both a moral and a legal question. La Posada Providencia recognizes and respects the individual employee’s right to engage in activities outside of employment which are private in nature and do not in any way conflict with or reflect poorly on the company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. Therefore, the list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics; it is inclusive, but not exhaustive:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, or any other company that may stand to gain from influencing information in our core business regardless of the nature of the employment
- Hiring or supervising family members or closely related persons
- Serving as a board member for a competitor or potential competitor, supplier, or contractor
- Owning or having a substantial interest in a competitor, supplier, or contractor
- Having a financial interest or potential gain in any La Posada Providencia transaction
- Placing company business with a firm owned or controlled by a La Posada Providencia employee or his or her family
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless: 1). It can be and is shared by all La Posada Providencia employees; or 2). The gift, discount, favor or service has a nominal retail value (less than \$25)



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- Using La Posada Providencia's resources to provide gifts, favors or services to a customer/potential customer, competitor or supplier, unless: 1). The gift, discount, favor or service has a nominal value, or 2). You have management approval
- Using proprietary and/or confidential information for personal gain or to the Company's detriment
- Unauthorized use of La Posada Providencia resources for your personal benefit or for the benefit of any other person or the Company
- Borrowing money from customers or firms, other than recognized loan institutions, from which our Company buys services, materials, equipment, or supplies
- Participating in civic or professional company activities in a manner that divulges confidential company information
- Misusing privileged information or revealing confidential data to outsiders
- Employees using connections obtained through the company for their own private purposes
- Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.

La Posada Providencia hired you based in great part on the strength of your prior experience, which may include education, credentials, and your representations about your ability, credentials or prior experience. It is a violation of this policy if you made misrepresentations regarding your experience.

At any time during your employment if you believe that your (or any other employee's) conduct or activities conflict with these guidelines, appear to conflict with these guidelines, or otherwise create a conflict of interest, you should discuss the details of the situation with your manager. Most concerns about conflicts of interest can be resolved and appropriately addressed through prompt and complete disclosure.