



Millenium

Hospitality Real Estate

**POLICY WITH REGARD TO THE USE OF COMPUTING
RESOURCES, TELECOMMUNICATIONS' MEDIA AND
THE INTERNET (ICT)**

Table of Contents

1. Purpose	2
2. Field of application	2
3. Use of the ICT Resources of MHRE.....	2
3.1 General principles	2
3.2 Computing resources: devices and programmes.....	2
3.2.1 Computers, tablets and other devices	2
3.2.2 Computer programmes	3
3.3 Telecommunications' media Use of land line and mobile phones of MHRE and the use of private mobile phones during the working day	3
3.3.1 Land line	3
3.3.2 Mobile phones of MHRE	3
3.3.3 Use of User's mobile phone during the working day	3
4. Use of the Internet	4
4.1 General principles regarding the use of and browsing on the Internet at the offices or through ICT Resources of MHRE	4
4.2 e-mail.....	4
5. Revision and monitoring by MHRE.....	4
6. Termination of the contractual relationship.....	5
7. Application	5

1. Purpose

This Policy sets out to regulate the use that employees, professionals and contributors make of computing resources, telecommunications' media and the Internet which **MILLENIUM HOSPITALITY REAL ESTATE SOCIMI, S.A.** (henceforth, "**MHRE**" or "**the organisation**") makes available to them. Said resources may include, inter alia, desktop computers and/or laptops, Internet access, business e-mail accounts, land lines, mobile phones, tablets and other devices, as well as software or programmes (henceforth, all said computing resources, telecommunications' media and the Internet shall be generally and interchangeably known as "**ICT Resources of MHRE**").

The present Policy also applies to the use of the private devices of employees in the working area for MHRE.

2. Field of application

The regulations determined in this document apply to the employees, professionals and contributors of MHRE (all of them referred to henceforth interchangeably as the "**Users**").

3. Use of the ICT Resources of MHRE

3.1 General principles

The use of the ICT Resources of MHRE must always be made with regard to the working or professional activities that the Users carry out for MHRE and so no personal nor professional use is permitted thereof which is unrelated with that of MHRE, except in those exceptional circumstances specifically determined in this Policy.

A fundamental objective of MHRE is the protection of people's dignity and so it is strictly forbidden to install, reproduce or send, on or via the ICT Resources of MHRE, any images, drawings, videos, sounds or expressions of a defamatory, offensive, obscene, pornographic, threatening or xenophobic nature which incite to violence or which are discriminatory on the grounds of race, sex, ideology, religion or which in any way violate the law, morality, public order, fundamental rights and, in particular, any information or expressions which offend the honour, reputation, privacy or image of MHRE, its suppliers, employees, professionals and contributors.

This is why it is not permitted to install or view on the ICT Resources of MHRE any type of photos, screensavers or video or sound material which may be deemed to offend people's dignity, in accordance with that specified in the previous paragraph above, specifying including any material of a sexual content.

3.2 Computing resources: devices and programmes

3.2.1 Computers, tablets and other devices

Users may not alter the computers, tablets and other devices (henceforth, the "**Computer equipment**") which MHRE makes available to them, nor connect to the Computer Equipment any other devices (PDAs, smartphones, printers, tablets, voice recognition devices, modems etc.) at the initiative of the User, without having the specific authorisation of the computer department of MHRE.

Access to computer equipment by entering the personal access code of each of the Users which shall be regarded as confidential, reserved information. This is why access to said equipment using the personal access code of another User is strictly forbidden.

3.2.2 Computer programmes

All the computer tools and programmes that MHRE makes available to Users must be used in accordance with the conditions determined in each case by the management bodies of MHRE and the instructions of the computer department of MHRE.

The use or copying of the computer programmes provided by MHRE is forbidden except in those cases in which the User has been specifically authorised to this end.

It is also forbidden to download, copy or install any type of computer programme on the ICT Resources of MHRE which the organisation makes available to the User without the specific authorisation of the computing department.

3.3 Telecommunications' media Use of land line and mobile phones of MHRE and the use of private mobile phones during the working day

3.3.1 Land line

MHRE makes available to Users land line terminals for the sole purpose of facilitating the carrying out of the professional activity thereof with regard to MHRE and their use by Users must be strictly professional.

Said land lines may only be used for private purposes occasionally and on a one-off basis, under those circumstances when it is strictly necessary (such as personal or family emergencies), provided that said use does not affect the normal carrying out of the working activity of Users.

The abusive, unjustified use of the organisation's phones by Users shall give rise to the application of the relevant legal measures. In particular, MHRE reserves the right to claim the proportional part of the phone bill pertaining to the use of said phone for unauthorised, private purposes.

3.3.2 Mobile phones of MHRE

In line with the characteristics of the professional activity to be carried out by each of the Users, and in particular in those eventualities in which the User's activity requires them to travel outside the work centre, or they need to be immediately locatable during their working day, MHRE may make available its mobile phones to them.

Said mobile phones are owned by MHRE and as a necessary work tool, their use by the User must be solely professional.

The use of said mobile phones for private purposes may give rise to the adoption by the organisation of the attendant disciplinary measures owing to disobedience, without prejudice to MHRE's right to claim the proportional part of the invoice issued by the mobile phone operator which pertains to the use of said phone for unauthorised, private purposes.

3.3.3 Use of User's mobile phone during the working day

The use of Users' private mobile phones during their working days must be limited to those circumstances in which it is strictly necessary and provided that it does not affect the normal carrying out of the professional activity of the User.

The abusive use of the User's private mobile phone at the work centre and/or during his/her working day may be subject to disciplinary measures.

4. Use of the Internet

4.1 General principles regarding the use of and browsing on the Internet at the offices or through ICT Resources of MHRE

MHRE provides Users with an Internet connection at its offices and also, where applicable, via the ICT Resources of MHRE. Connection to and browsing on the Internet must comply with strictly professional purposes, though Users are authorised to make use of said work tools for personal purposes provided that this is done in a reasonable, proportionate manner and in accordance with the principle of contractual good faith, all of which whilst fully respecting the security measures pertaining to the information and the computing systems.

It is strictly forbidden to use the Internet for the purposes of accessing websites or pages with content of a defamatory, offensive, obscene, pornographic, threatening or xenophobic nature, or which incite to violence or which are discriminatory on the grounds of race, sex, ideology, religion or which in any way violate the law, morality, public order and fundamental rights.

4.2 e-mail

MHRE shall make available to those Users who so request to carry out their working or professional activity an individual e-mail address on the Web domain of MHRE.

All the content sent and received in said e-mail accounts, or any other e-mail account provided by MHRE, is of a professional nature and shall be owned by MHRE and the sender is wholly responsible for the information, content and statements communicated via this media.

Said individual e-mail address shall be regarded as a basic work tool owned by the organisation and it must be used solely for professional purposes, without there being any expectation of privacy in its use.

The professional nature of said e-mail address, as well as the nature of the content thereof (basically communications with customers; other employees, professionals or contributors; and suppliers) necessarily implies that the content of the communications may be audited by the computing department of MHRE, at the request of the management bodies of MHRE and the Users are specifically warned thereof.

Under no circumstances may the e-mail made available to the User be used to send contents of a defamatory, offensive, obscene, pornographic, threatening or xenophobic nature, or which incite to violence or which are discriminatory on the grounds of race, sex, ideology, religion or which in any way violate the law, morality, public order, fundamental rights and, in particular, any information or expressions which offend the honour, reputation, privacy or image of MHRE, its customers, partners, employees, professionals, contributors, shareholders or third parties.

At the same time, it is forbidden to use private e-mail accounts to carry out professional communications and to send information from MHRE, its customers, partners, employees, professionals, contributors or shareholders.

5. Revision and monitoring by MHRE

With a view to monitoring the observation of this Policy by the Users, MHRE may periodically revise:

1. The content of the hard drive of any computer equipment made available to the Users.
2. Information pertaining to the connection and use of the Internet by Users.
3. The content of the business e-mail account assigned to each User for carrying out their professional activity.

Said revisions shall be carried out by the computing department at the request of the MHRE Management bodies or by any other person specifically designated by the latter, having to respect at all times the necessary legal guarantees of the Users.

If, during said revisions, any improper use thereof by any of the Users is detected, MHRE shall adopt the appropriate legal measures.

The abusive, disproportionate use of the ICT Resources of MHRE for purposes unrelated with work or infringing the security measures of the information and computing system of the organisation, shall be regarded as an infringement of the duty of contractual good faith, irrespectively of whether it entails any personal profit or not for the User or any quantifiable harm to MHRE. Said infringement may constitute grounds for a disciplinary sanction, including, where applicable, dismissal for disciplinary reasons.

6. Termination of the contractual relationship

The User shall have access to his/her professional e-mail account and to the rest of the ICT Resources of MHRE during the term of his/her contractual relationship with MHRE. Upon termination of said contractual relationship, access to the professional e-mail mailbox shall be automatically interrupted, as well as to any electronic media used.

In the event of the termination of the contractual relationship, the User shall be required to return all the ICT Resources of MHRE made available to him/her, within no more than 48 hours and in the same condition as they were in when they were handed over to him/her. If any damage is detected to said resources for reasons attributable to the User, MHRE may claim compensation from the User for the damage caused.

7. Application

This Policy has been approved by the Board of Directors of Millenium Hospitality Real Estate SOCIMI, S.A. at its meeting held in Madrid on 17th of March, 2022

The follow-up and monitoring of the application of this Policy shall be carried out by the Board of Directors, by the Compliance Officer and by the computing department of MHRE.