Therasia Resort

sea & spa

2025

THE CODE OF ETHICS

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PREMISE

The Therasia Resort Sea & Spa is much more than an accommodation facility; it is a unique experience due to the position in which the hotel stands and the unspoiled nature of the Aeolian Islands.
A natural park to be preserved that requires respect, kindness and love for beauty.
In this context, the property wanted to underline the ethical value that environmental protection and the culture of hospitality have, clearly defining the set of values in which it believes and which it shares with its team, together with the responsibilities it assumes both inward and outward.
This document (the Code of Ethics) is a fundamental tool in the context of dissemination and clarification of corporate principles.
The present Code of Ethics is published on the official website of Therasia Resort Sea & Spa and on the intranet, and is also provided to all employees and external collaborators upon their hiring or at the start of their collaboration.

INTRODUCTION

For the Therasia Resort Sea & Spa, business ethics are configured as the ability to integrate its business activities with respect and protection of the interests of all partners and all individuals with whom it relates, with the protection of environmental resources and their preservation for future generations. The primary objective of the adopted Ethical Code is to make the values in which the ownership and its team recognize themselves at all levels common and widespread, ensuring that anyone called to make a decision clearly remembers that at stake are respect for the environment, for people, protection of energy sources, as well as the reduction of consumption. All of this must be a modus operandi that is part of the corporate culture.

01

PURPOSE AND SCOPE OF APPLICATION

1.1 Purpose

The main purpose of the Code is to make the values in which the Therasia Resort Sea & Spa recognizes itself common and widespread, so that everyone within the company, in making a decision, has a guide to follow and act keeping in mind not only their own rights and duties but also those of others.

1.2 Scope of application

The Code applies to all employees of the Therasia Resort Sea & Spa, as well as to all business of the Therasia Resort Sea & Spa or in which the Hotel has an interest and to Third Party recipients, meaning Third Party recipients, subjects external to the Company who operate, directly or indirectly, for the Therasia Resort Sea & Spa (collaborators, consultants, agents, suppliers or commercial partners).

02

OUR COMMITMENT

Our commitment is to offer a highly professional service in terms of eco-sustainability.
People, whether they are company employees, suppliers or customers, are the main and constant point of reference for everything that is an excellent result we aim for.
The people on our team represent our most important intangible capital. The ownership of the Therasia Resort Sea & Spa recognizes a fundamental value in the diversity of cultures and talents and wants to attract and grow people with leadership skills, passion for their work and intellectual curiosity that drives them to always give their best.
Consistency, transparency and respect must guide every decision/behavior in a context of mutual trust and interdependence.
Specifically, for Management, the primary goal is to measure the performance of Therasia Resort Sea & Spa not only in economic terms but also in terms of eco-sustainability. Therasia Resort Sea & Spa aims to minimize the negative impact of its activities on the environment and the community, in accordance with current legislation. In this regard, the behavior of employees must be guided by respect for and protection of local culture and communities.

To this end, suppliers and business partners are asked to commit to strengthening their ecological commitment through clear rules of conduct (environmental risk assessment in financing and investments, exclusion of polluting activities or products, proper waste management and disposal, use of recyclable and eco-sustainable products, etc.).

Therasia Resort Sea & Spa also promotes this same commitment among its guests, encouraging them to make daily choices in this direction (mindfulness towards plastic, paper, water, and energy consumption, etc.).

Additionally, Therasia Resort Sea & Spa is engaged in various activities supporting and protecting marine environments and beaches.

We recognize the role of the non-profit sector in the fair and cohesive development of society:

We support the non-profit world and social enterprises, developing partnerships to activate projects of common benefit.

We promote the creation of social enterprise networks to implement initiatives in favor of disadvantaged groups.

We establish or participate in non-profit organizations aimed at social utility and community service.

Aware that the global economic, environmental, and social balance depends on the integration of local factors, we seek to influence the global scenario by supporting international solidarity initiatives. We identify the needs and requirements, not only material, of the community and support them through charitable donations and sponsorships.

BASIC VALUES 03

3.1 Centrality of the person - Diversity and Inclusion

In carrying out their work, all those who operate on behalf of the Therasia Resort Sea & Spa act in full respect of the physical, psychological, cultural and moral integrity of people. From this point of view, diversity is a fundamental value and we believe that promoting inclusion can be a source of competitive advantage, creating a more motivated workforce for the adoption of the best decisions, based on a deep understanding of our customers' needs.

The Therasia Resort Sea & Spa doesn't tolerate any form of discrimination or exclusion regarding age, culture, ethnicity, nationality, religious belief, race, public opinion, marital status, pregnancy, gender and sexual orientation, gender identity and/or expression, health or disability.

Human resources are the most important asset of Therasia Resort Sea & Spa. They represent its strength, effectiveness, intelligence, reputation, and future. Only through full engagement at every level in teamwork, the sharing of goals, and their protection and promotion, can Therasia Resort Sea & Spa fulfill its mission as an eco-sustainable establishment.

All employees are entitled to a safe and comfortable work environment, one that is peaceful and conducive to interpersonal relationships, based on equality, mutual fairness, and respect for individual freedoms and dignity. They have the right to perform their duties in an environment that ensures respect for each person’s human dignity, avoiding any form of discrimination or inappropriate and unwanted behavior.

Management guarantees each employee the right to protection from any act or behavior that results in a prejudicial effect or gender discrimination, even indirectly. Initiatives are undertaken to promote greater mutual respect for personal inviolability through training, information, and prevention. Each employee, in interpersonal relationships, is expected to contribute to promoting and maintaining a work environment and organization founded on the principles of fairness, freedom, dignity, and equality.

Mobbing, harassment, and any other form of discrimination that marginalizes a person for cultural, political, union-related, religious, ethnic, territorial, sexual orientation, or other reasons are unacceptable and harm the dignity of those affected, compromising their health, confidence, morale, and work motivation. Additionally, they negatively impact job performance and the organizational climate.

Management recognizes that psychological and physical well-being, emotional stability in the workplace, and the emotional and motivational aspects of work activities are strategic factors for both the organization and the management of human resources, especially due to the direct impact these aspects have on the quality of performance and relationships with clients.

Management ensures the adoption of diverse, timely, and impartial measures aimed at guaranteeing that employees subjected to mobbing or harassment are able to put an end to the harassing behavior. The prevention of all forms of mobbing, harassment, and discrimination is a fundamental goal of Therasia Resort Sea & Spa's Management, to be pursued also by promoting work models based on the principles outlined in this code of conduct.

Those who report cases of mobbing or harassment have the right to confidentiality and to be protected from direct or indirect retaliation.
Any act or behavior that constitutes sexual, moral, or psychological harassment is unacceptable. The right of all employees to be treated with dignity and to have their personal freedom protected is affirmed.

Employees also have the right to report any intimidation or retaliation experienced in the workplace as a result of harassing acts or behavior.

3.2 Honesty and Transparency

Honesty represents the fundamental principle for all the activities of the Therasia Resort Sea & Spa. Relations with stakeholders at all levels are based on criteria and behaviors of correctness, consistency, loyalty and mutual respect.

The principle of correctness implies respect for rights, also in terms of privacy and equal opportunities, as well as the laws in force aimed at protecting the individual personality of all subjects who are professionally involved with the company.

The principle of transparency is based on the truthfulness, accuracy and completeness of information both inside and outside the hotel. In compliance with the principle of transparency, every corporate operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous. Inside the Therasia Resort Sea & Spa there is and should not be any secret but only Passion.

3.3 Efficiency

In every work activity, the economy of the management and use of company resources must be pursued, in compliance with the most advanced quality standards and environmental protection; paying particular attention to reducing the consumption of energy and water sources without lowering the standard of service.

3.4 Fair competition

The Therasia Resort Sea & Spa recognizes the value of competition when inspired by the principles of correctness, fair competition and transparency towards the operators present on the market, undertaking not to unduly damage the image of the Competitors and their products.

3.5 Sustainability

The Therasia Resort Sea & Spa recognizes the fundamental importance of safeguarding the environment in ensuring a better future for next generations. Consequently, the Hotel undertakes to safeguard the environment and to contribute to the sustainable development of the area, also through the use of the best technologies available and the constant monitoring of company processes, as well as the use of KM 0 products and procurement from local producers, saving water and energy resources.

The Therasia Resort Sea & Spa is sustainable because it offers its guests an unconventional and authentic experience. The property's commitment is to safeguard the abundance and beauty of what nature offers, with the aim of passing on to present and future generations its values and traditions that support the long-term development of human and environmental communities.

The Therasia Resort Sea & Spa undertakes at every stage of its action to apply criteria of caution and a preventive approach towards the environment and its biodiversity. It also undertakes to promote initiatives for greater corporate environmental responsibility and to develop the use of technology so as not to damage the environment.

3.6 Well-Being

The Therasia Resort Sea&Spa is committed to creating well-being for anyone who works there directly or indirectly, with a view to well-being, well-doing and well-staying.
The success of our structure is not only linked to profit but also to the diffusion of well-being for guests and the community.
Well-being is an experience that you live together.

04

HEALTH AND SAFETY IN THE WORKPLACE AND THE ENVIRONMENT

4.1 Health Protection

The Therasia Resort Sea & Spa is committed to ensuring a safe, healthy and productive work environment and pays particular attention to environmental issues; therefore doesn't accept any compromise in the field of health and safety protection of its employees and collaborators in the workplace and undertakes to adopt corporate strategies and techniques that reduce the typical risks of the activity carried out, and improve the environmental impact of its activity, in compliance with current legislation.

04

4.2 Safety and Environment

For this purpose, the Therasia Resort Sea & Spa undertakes to comply with the following principles:

- implementation of all the actions necessary to ensure compliance with and adaptation to the regulatory provisions in force on occupational safety and respect for the environment;
- communication and dissemination of information regarding the protection of workers' health, occupational safety and environmental protection to internal and external stakeholders;
- promotion of the use of the most advanced technologies to achieve high levels in the protection of workers' health, occupational safety and environmental protection;
- compliance with the laws on working hours;
- coinvolgere tutti i livelli dell'organizzazione aziendale e tutti i dipendenti assicuranado che responsabilità e procedure operative siano definite con precisione, appropriatamente comunicate e chiaramente comprese.

05

RELATIONS WITH STAKEHOLDERS

At Therasia Resort Sea & Spa, we consider ourselves an integral part of a broader society and recognize our responsibility toward it. We are committed to playing an active role in shaping a sustainable future, grounded in social justice and responsible business practices.

Our social responsibility is expressed through concrete actions. We continuously strive to make a positive contribution to the communities in which we operate, going beyond mere business transactions. We actively support social initiatives that foster inclusion, education, and sustainable economic growth.

Sustainability is a fundamental pillar of our social commitment. We work to reduce the environmental impact of our operations by promoting sustainable practices and adopting innovative solutions to preserve natural resources.

Moreover, we actively participate in the overall well-being of society, collaborating with local and global organizations to address social challenges and promote equality. Our vision of social responsibility extends beyond corporate boundaries, permeating every aspect of our operations and helping to build a more equitable and sustainable future for all.

Our ethical philosophy extends beyond the company, embracing our suppliers, customers, and the local community. We expect them to adopt the same high ethical standards and conduct that guide our daily operations.

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Shared Ethical Standards:

We firmly believe that ethical collaboration with suppliers and customers is essential for our shared success. Therefore, we are committed to selecting and maintaining relationships with business partners who share our values of integrity, transparency, and social responsibility. This collaboration, based on high ethical standards, creates a synergy that goes beyond simple business transactions, contributing to the creation of lasting and meaningful relationships.

Expectations for Suppliers:

We expect our suppliers to adopt ethical policies in their operational processes. This includes respecting labor laws, protecting the environment, and promoting safe and dignified working conditions. We collaborate with suppliers who demonstrate a tangible commitment to sustainability and social responsibility.

Expectations for Customers:

Similarly, we expect our customers to adopt ethical practices in their business dealings. We value relationships that respect the principles of fair competition, honest transactions, and mutual respect. In doing so, we build strong business partnerships based on trust and integrity.

Through shared ethics with suppliers and customers, we aim to promote a responsible supply chain and ethical business relationships, contributing to a more sustainable and morally engaged business landscape.

05

Supporting local associations and communities

We believe that dialogue with the community and local associations is of strategic importance for developing our business in a sustainable manner:

- We keep a communication channel open with associations that represent the interests of our stakeholders, with the goal of cooperating in a way that respects mutual interests.
- We actively inform and involve the associations we deem most representative of our stakeholders on specific topics of interest to them.

Therasia Resort Sea & Spa is committed to promoting the eco-sustainable development of its activities, while encouraging the promotion of the local area and supporting cultural initiatives sponsored by the community and local institutions through:

- Sponsorship of cultural and sporting events typical of the area surrounding the property and the entire island of Vulcano;
- Employment of residents from the Island ;
- The use of on-call staff, suppliers, and consultants located on the island.

06

RELATIONS WITH PUBLIC INSTITUTIONS

The Therasia Resort Sea & Spa pursues the objective of maximum integrity and correctness in relations with public institutions and, in general, with the Public Administration, including as regards the request and/or management of permits, authorisations, licenses and public disbursements, in order to ensure maximum clarity in institutional relations in harmony with the need for organizational and managerial autonomy typical of any economic operator.

The Therasia Resort Sea & Spa forbids its personnel from accepting, offering or promising, even indirectly, money, gifts, goods, services, benefits or favors in relation to relationships maintained with Public Officials or Public Service Officers, to influence their decisions, in view of more favorable treatment or undue performance or for any other purpose, including the performance of acts of their office.

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BUSINESS MANAGEMENT

7.1 Local Compliance

The administrators, employees, collaborators and those who in any capacity operate on behalf of the Therasia Resort Sea & Spa are required to comply with the laws and regulations in force in Italy and those of the country where they carry out their activity on behalf of the Hotels.

07

7.2 Use of information and financial resources

Below are the behaviors that administrators, employees, collaborators and those who in any capacity operate on behalf of the Therasia Resort Sea & Spa are required to observe:

- it is not permitted to use confidential information relating to the company and its customers/suppliers for personal benefit;
- the knowledge and technical skills developed by the Therasia Resort Sea & Spa constitute an important resource that everyone must protect and not spread. The obligation of confidentiality indicated here remains even after the termination of the employment relationship or collaboration with the Hotel;
- the anti-money laundering legislation must always and in any case be observed;
- They must not finance and participate in any way in subversive and/or terrorist activities;
- They must manage personal and sensitive data in compliance with current regulations to ensure a high level of security in the selection and use of their information systems intended for the processing of personal data and confidential information.

08

DILIGENCE AND FAIRNESS IN THE MANAGEMENT OF CONTRACTS

Contracts and work assignments must be performed in accordance with what has been consciously established by the parties. For correct management of contractual relationships, the Therasia Resort Sea & Spa undertakes not to exploit positions of dominance with respect to its counterparties and to guarantee broad and exhaustive information to all internal and external collaborators involved in the activities envisaged by the stipulated contracts.

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CONFLICT OF INTEREST AND COMPANY LOYALTY

The administrators, employees, collaborators and those who in any capacity operate on behalf of the Therasia Resort Sea & Spa, must carry out their work activities pursuing the objectives and interests of the company, avoiding being in conditions or activities that could be contrast with the latter.

In the event that Company personnel find themselves (or think they are) in a situation that represents or generates a possible conflict of interest, they must immediately report it to their direct supervisor.

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POLITICAL ACTIVITY

All hotel employees are free to have their own political ideas and to carry out political activities, having the duty to clarify that their opinions are exclusively individual and not expressed as a collaborator of the Hotel. All forms of political propaganda within the workplace are prohibited.

It is forbidden to use databases, corporate information, archives or anything else owned by the hotel to carry out political propaganda activities.

It is not permitted to donate company funds to parties or individual politicians and to comply with recommendations or requests for favors from politicians.

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USE OF COMPANY ASSETS

The staff of the Therasia Resort Sea & Spa is required to use the assets and resources of the Hotel to which they access or have access to exclusively pursue the purposes and interests of the Hotel and not those of their own or of any third party. Any use of company assets and resources which is in conflict with the company's interests or which is dictated by personal and/or professional reasons unrelated to the employment relationship with the Botania Relais & Spa is prohibited.

The company provides its employees and collaborators with all the goods that are necessary to carry out their work and strictly prohibits the downloading or transmission of materials/messages with threatening, obscene, violent, illegal, immoral or inappropriate content.

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PROTECTION OF INFORMATION

The Therasia Resort Sea & Spa recognizes that digital intangible assets have acquired ever-increasing importance over time and considers information security and observance of the related principles of confidentiality, integrity and availability of data, as an integral part of its activities.

Therefore, the Hotel undertakes to protect its information systems from illegitimate access and unauthorized disclosure of the information processed, while ensuring full compliance with the applicable regulations on the protection of personal data and information security standards.

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MANAGEMENT OF INTERNATIONAL RELATIONS

The Therasia Resort Sea & Spa undertakes to ensure that all its relationships, including those of a commercial nature, with subjects operating at an international level, take place in full compliance with the laws and regulations in force. The goal is to avoid the dangers of committing or, in this case, a crime of a transnational nature.

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MANAGEMENT OF INTERNATIONAL RELATIONS

The Therasia Resort Sea & Spa undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disseminating it to the parties involved through specific and adequate communication activities.

In order for anyone to conform their behavior to those described in this document, the Hotel will ensure an adequate information/training program and continuous awareness of the values and ethical standards contained in the Code of Ethics.

The training of the recipients of the Code of Ethics is an essential component of the program, as it is a fundamental prerequisite to ensure the effective implementation of the model and the preventive measures it provides. Management is responsible for updating the Code of Ethics over time, ensuring its adequacy and suitability.

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DISCIPLINARY MEASURES

The rules contained in this Code integrate the behavior that administrators, managers, employees, collaborators and those who in any capacity operate on behalf of the Therasia Resort Sea & Spa must observe as indicated in this Code.

The Therasia Resort Sea & Spa will sanction behaviors that are not compliant and consistent with the values and principles of this Code, reserving the widest possible protection of its interests according to the seriousness of the infringements committed in application of the company disciplinary system.

THE CODE OF ETHICS
THERASIA RESORT SEA & SPA