CORPORATE COMMUNICATION, MARKETING AND ADVERTISING POLICY

Approved by the Board of Directors on 27 February 2017
I. OBJECT AND SCOPE

For Meliá Hotels International (hereinafter MHI or the Company) permanent communication with all internal and external stakeholders is a strategic objective governed by the corresponding legislation, the applicable principles of the Code of Ethics and the principles contained in this Policy.

This Policy is applicable globally and is mandatory for both Company employees and any third parties with whom the Company has any type of relationship that involves any type of communication, particularly the agencies and professionals hired by MHI or any Group company.

This Policy defines minimum requirements without prejudice to any additional or specific regulations that may be approved on the subject nor any specific legal regulations that may be applicable in any country in which the Company or any Group company operates.

The Board approved the Corporate Communication, Marketing and Advertising Policy in September 2011 and revised it in February 2017.

II. APPLICATION FRAMEWORK AND COMMUNICATION OBJECTIVES

This policy applies to all internal and external corporate and commercial communications issued by the Company and/or any entity within its Group through any channel or system.

The objectives of communication are:

1.- To create and nurture relationships with all our stakeholders, providing them with open, accurate, clear and transparent information about our mission, strategy, objectives and achievements.

2.- To enhance the corporate reputation of MHI through an accurate and appropriate representation of the image of the Company.

3.- To create and maintain the communication channels required to guarantee all stakeholders have the opportunity to participate in our leadership and reputation.
III. GUIDING PRINCIPLES

Within the framework described above, Company communication will be governed by the following principles:

- **Principle of Ethics**: Communication will try to help stakeholders make responsible decisions in their best interests rather than just comply with codes and recommendations. Communication will respect the truth and contribute to the transforming role of the tourism industry in society. Communication must respect human dignity, especially in regard to children, and must not reflect any behaviour which is harmful to the environment except for educational purposes. Any communication that includes another company’s brand or product will require approval.

- **Principle of legality and regulatory compliance**: Communication will aim to achieve our objectives in strict compliance with applicable law at all times and in each country or territory.

- **Principle of transparency**: Information must be sufficient, understandable, truthful, accessible through any channel or system, and not confuse or deceive the recipient. The language used must always be appropriate for the target audience.

- **Principle of objectivity**: Communication will be objective and not include subjective opinions. Data and statements must be checked and verifiable.

- **Principle of equality**: Communications will always comply with the principles of equality and non-discrimination, especially in relation to sexual discrimination.

- **Principle of coherence and "glocality"**: Based on shared content and values, communication will segment and process information so that it can be understood within the different cultural frameworks of the different countries in which we operate. Wherever possible, MHI communications must be made in at least Spanish and English.

- **Principle of innovation and responsiveness**: To reach the widest audience as early as possible and thus contribute to our positioning as an innovative and cutting-edge company, corporate and commercial communications may be made using the most varied online and offline technologies to ensure accessibility from diverse devices in any country or territory.
IV. TYPES OF COMMUNICATION

IV.1. Corporate communication:

IV.1.1 External corporate communication:
Aimed at external stakeholders. The main channels are:

a) Corporate website (www.meliahotelsinternational.com) containing all information of interest, published as soon as it becomes available and ensuring its conservation and subsequent accessibility.

b) Newsletter to stakeholders containing information and an analysis of the current situation of the Group, to support disclosure of that information and the positioning of MHI.

c) Other channels and formats: i) press releases (prepared and published internally or with partners); ii) press conferences and iii) corporate profiles in the most important social networks.

The Company will prepare an External Corporate Communication Model as a basis for the approval of the annual Corporate Communication Plan for all markets in which the Company operates.

IV.1.2. Internal corporate communication:
For internal customers or employees using the Employee Portal and internal newsletters and communications.

The Company will develop an Internal Communication Style and Management Manual defining applicable guidelines and procedures.

IV. 2. Advertising and Marketing:

Advertising activity includes any form of commercial communication offering products or services through the press, radio, TV, posters, brochures, Internet or other electronic channels, letters, telephone calls, etc.

All the general principles defined above will be applicable to this type of communication, without prejudice to any specific applicable regulations.