

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

LAST UPDATED: JUNE 2022



INTRODUCTION

Deutsche Hospitality comprises a series of global luxury, upscale, midscale and economy brands. The group brings together a multitude of employees working in a wide variety of professions and occupations all over the world and unites them under a single umbrella. We are immensely proud of this diversity because it is able to transport our passion, tradition and vision to a wide range of different sectors and to many corners of the planet.

Such diversity also means we bear a responsibility to our employees, partners and guests and to the countries in which we operate. Our daily actions define how DH is perceived. Corporate responsibility includes compliance with applicable laws everywhere and at all times, respect for fundamental ethical values, and the pursuit of sustainable practices. For this reason, our conduct is aligned to international norms. We pay particular attention to human rights, to work and social standards and to environmental protection.

We expect our suppliers and business partners, including sub-contractors and all companies that maintain a relationship with a DH company or division, to base their own actions and activities on the same ethical principles. This Code of Conduct for Suppliers and Business Partners sets out binding minimum standards and rules for business relations between the companies.

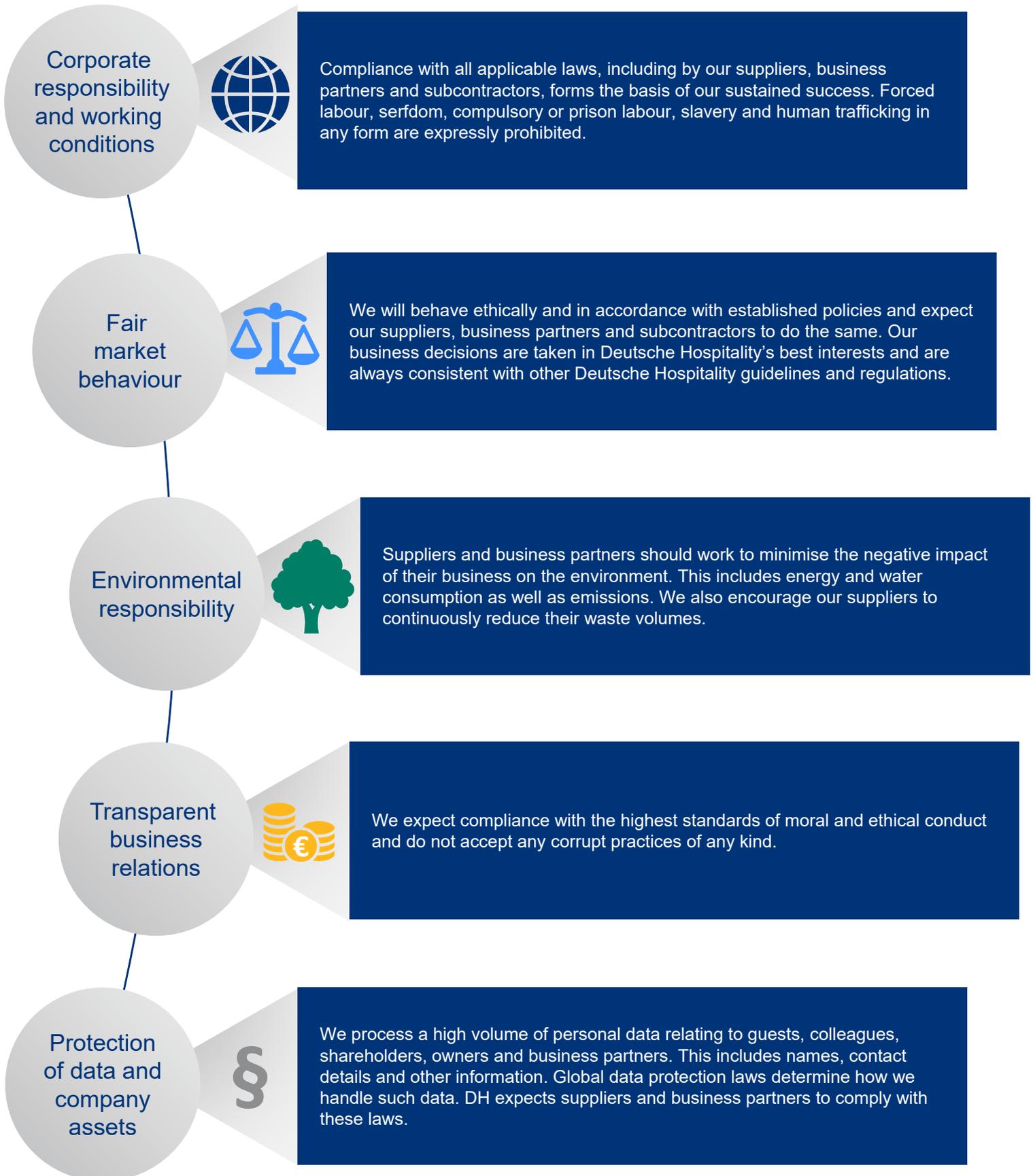


Oliver Bonke, CEO



Ulrich Johannwille, CFO

OVERVIEW





CORPORATE RESPONSIBILITY AND WORKING CONDITIONS

Compliance with all applicable laws, including by our suppliers, business partners and subcontractors, forms the basis of our sustained success. Forced labour, serfdom, compulsory or prison labour, slavery and human trafficking in any form are expressly prohibited.

Human rights

We believe that ethical behaviour and business success go hand in hand. For DH, respect for human dignity is more than a factor that needs to be considered. For us, human dignity means that no employee must ever be subjected to physical, sexual, psychological or verbal harassment or abuse. We are committed to ensuring the fulfillment of basic human rights and reject all forms of forced labour, debt bondage, modern day slavery and child labour.

DH suppliers and business partners shall respect and adhere to globally applicable regulations for the protection of human rights as fundamental and universally applicable requirements.

Equal opportunities and non-discrimination

Suppliers and business partners shall provide a work environment that enables inclusion and respects the diversity of all employees. There shall be no discrimination in hiring, compensation, training, promotions, terminations, retirement or any other employment practices. Suppliers and business partners must commit to equal opportunity and not discriminate against anyone due to gender, ethnic or national origin, colour, religion, age, disability, sexual orientation or identity, or any other basis protected by law. Such discrimination, as well as any form of unsolicited verbal or physical advances, will not be tolerated by suppliers and business partners.

Freedom of association

Supplier and business partner employees must be free to choose to join or not join a trade union/employee representative body of their choice without the threat or intimidation. Employees shall not be discriminated against on account of union membership or involvement in works councils.

Where the right to join trade unions and workplace employee representation is restricted by local law, suppliers and business partners should encourage legal alternatives of employee representation.

Employment relationships

Employment relationships with supplier and business partner employees are entered into on a voluntary basis and may be terminated by the employees at their own will within a reasonable period of time. Supplier and business partner employees are entitled to have a written employment contract containing the terms and conditions of their employment. Only employees who have a legal work permit are to be hired. Foreign contract employees and immigrants shall be granted the same rights as local employees. All supplier and business partner employees shall have the right of unrestricted freedom and the personal freedom of movement. In particular, no identification documents or personal belongings of an employee may be retained.



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Health and safety at work, working hours and remuneration

We expect our suppliers and business partners to strive to implement high levels of health and safety at work by applying appropriate health and safety management measures in their business.

Our suppliers and business partners must ensure that employees receive the agreed remuneration, which must be at least equal to the prevailing minimum wage. Wages and salaries may not be withheld for any reason, and no deductions are permitted for disciplinary reasons. If there are no statutory or collectively agreed regulations in place, the remuneration shall be based on the industry-specific and locally agreed remuneration and benefits in order to ensure at the least an adequate standard of living for the employees and their families. Our suppliers and business partners must therefore especially commit to compliance with applicable international labour organisation standards.



FAIR MARKET BEHAVIOUR

We will behave ethically and in accordance with established policies and expect our suppliers, business partners and subcontractors to do the same. Our business decisions are taken in Deutsche Hospitality's best interests and are always consistent with other Deutsche Hospitality guidelines and regulations.

Free competition

We expect suppliers and business partners to commit to fair play and honesty without any conspiracy or abuse of economic power.

For this reason, DH's suppliers and business partners must comply with applicable antitrust laws. In particular, they will not engage in any anti-competitive practices with other market participants, suppliers or customers and will not abuse any dominant market position that they may have.

Money laundering

DH's suppliers and business partners will only conduct business with entities they deem to be trustworthy. They will ensure there is no violation of any applicable statutory anti-money laundering regulations.

Trade regulations

DH's suppliers and business partners will comply with all applicable laws governing the import and export of goods, services and information.

Suppliers and business partners will comply with all applicable export controls, sanctions and customs regulations, including prohibitions and restrictions ("Trade Laws"). In particular, they shall ensure that the supplier and business partner itself, its beneficial owners, any of its agents and any other subcontractor it uses are not listed on any applicable sanctions lists as a "Denied Party".

Business information

For us, sustainable and trusting business relationships are based on transparency. For this reason, DH's suppliers and business partners are to publish business data and reports on their business activities truthfully and in accordance with the applicable laws.



ENVIRONMENTAL RESPONSIBILITY

Suppliers and business partners should work to minimise the negative impact of their business on the environment. This includes energy and water consumption as well as emissions. We also encourage our suppliers to continuously reduce their waste volumes.

The environment and climate

We are committed to steadily reducing our environmental footprint. To this end, we have defined targets and measures to reduce our use of resources and energy. We expect a similar commitment from our suppliers and business partners to reduce their respective environmental footprints. As we create transparency by sharing our targets, policies and available reports, we will give preference to suppliers and business partners who commit to the following principles and/or initiatives.

- Strategy for reducing ecological footprint
- Environmental and/or energy programme with comprehensible targets and monitoring of the relevant environmental and energy aspects and of risks
- Compliance with environmental and energy regulations and with international, national, and local legislation
- Environmental and energy performance improvement of the company's products, services and operations
- Programmes and measures to achieve a closed-loop principle and responsible waste management
- Assist DH in collecting data to determine our environmental footprint

Animal welfare

Our products should be responsible and ethically sound. We therefore give preference to suppliers and business partners which can demonstrate transparent supply chains for animals (breeding, feeding, transport and processing) and which advocate better animal welfare and quality of life.



TRANSPARENT BUSINESS RELATIONS

We expect compliance with the highest standards of moral and ethical conduct and do not accept any corrupt practices of any kind.

Avoiding conflicts of interest

DH's suppliers and business partners are to base their decisions exclusively on factual criteria and are not to be influenced by personal interests and relationships.

Prohibition of corruption

Corruption (i.e., the acts of an authority or powerful party that are unlawful, immoral, or contrary to ethical standards) is illegal and harmful to society. DH's suppliers and business partners will not tolerate corruption. They will ensure that their employees, subcontractors or agents do not give, offer or accept bribes, improper donations or other improper payments or benefits when dealing with customers, public officials, intermediaries or other third parties. The parties involved shall ensure that consultants or intermediaries are only remunerated for the consulting and intermediary services actually provided and that the remuneration is commensurate with performance rendered.

Gifts, entertainment and invitations

The offering and acceptance of gifts or entertainment is generally not permitted. DH's suppliers and business partners are not to offer DH employees or third parties, either directly or indirectly, inappropriate benefits in the form of gifts, entertainment or invitations that exert undue influence. Neither are they to solicit or accept such improper benefits. Any exceptions are to be presented transparently by both sides and approved on a case-by-case basis. Gifts are permitted where customary and generally accepted, provided acceptance complies with local laws and regulations.

Risk-based control

Suppliers and business partners are expected to implement necessary rules and regulations, documentation and other suitable processes to ensure compliance with the principles set out in this Code of Conduct and applicable legislation (including tax legislation). This includes a functioning control system with clearly defined responsibilities and processes as well as the respective documentation. Corrective action is expected to be taken, where appropriate, within specified and reasonable timelines. We reserve the right, on an individual basis, to conduct on-site inspections at supplier and business partner premises in order to check compliance with the stipulated requirements. This follow-up control will be conducted by experts, with prior notice and in the presence of the supplier and business partner representatives, during regular business hours and in accordance with respective applicable law, particularly, in compliance with data protection laws.



PROTECTION OF DATA AND COMPANY ASSETS

We process a high volume of personal data relating to guests, colleagues, shareholders, owners and business partners. This includes names, contact details and other information. Global data protection laws determine how we handle such data. DH expects suppliers and business partners to comply with these laws.

Data protection and data security

Suppliers and business partners undertake to handle personal data provided to them by DH sensitively and to comply with all applicable laws on the personal data protection of employees, customers, suppliers and others. Business premises and locations where DH's personal data or confidential information is stored or processed shall be protected against unauthorised access by third parties. Appropriate evidence and certificates will be made available on request.

Protection of know-how, patents, trade and business secrets

DH's suppliers and business partners shall respect DH's know-how, patents, trade and business secrets and those of their third parties. They shall not disclose such information to third parties without the prior, express and written consent of DH or in any other unauthorised manner.

Handling company assets

DH's suppliers and business partners shall respect DH's tangible and intangible assets and shall not use them for unfair or external purposes. They will ensure that their employees, as well as any third parties used by them for business purposes (such as subcontractors or agents), will neither damage DH's assets nor use them improperly - i.e. against DH's interests.

APPLICATION OF THE CODE OF CONDUCT

All of us, including our suppliers and business partners, must fulfill our responsibility to act ethically and to protect DH's reputation. In the event that a small minority of our employees or suppliers and business partners infringes any of these principles, we provide reporting channels for compliance violations for our employees as well as for our suppliers and business partners.

Violation reporting

Significant compliance violations can be reported via the DH Speak-Up Line, an Internet-based and anonymous reporting platform available in multiple languages. This ensures a specially encrypted and confidential dialogue with DH's Governance, Risk & Compliance Department.

<https://www.bkms-system.com/grc-speakup>

Contact

DH's Governance, Risk & Compliance Department is always available should you have any questions or suggestions regarding the Business Partner Code of Conduct:

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Governance, Risk & Compliance
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60528 Frankfurt am Main

codeofconduct@deutschehospitality.com