



Declaration of principles of Maritim Hotelgesellschaft mbH

Commitment to respect human rights and environmental risks

We, Maritim Hotelgesellschaft mbH, are committed to respecting human rights and the environment. We are therefore committed to respecting human rights and environmental concerns in our own business activities and in our supply chains and to ensuring that human rights and environmental violations are prevented, that those affected have access to remedy and that effective remedial action is taken in the event of violations.

Our standards

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), we are committed to complying with the standards of the following internationally recognised human and environmental rights reference instruments:

- United Nations Universal Declaration of Human Rights
- Principles of the United Nations Global Compact (UNGC)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- International Covenant on Political and Civil Rights of the United Nations
- International Covenant on Economic, Social and Cultural Rights of the United Nations
- Core labour standards of the International Labour Organisation (ILO) on labour and social standards
- Charter of Fundamental Rights of the European Union
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Waste
- Law on corporate due diligence to prevent human rights violations in supply chains

In addition to these standards, our Code of Conduct at

<https://www.maritim.com/en/code-of-conduct>

forms the basis for our actions and the actions of all our direct suppliers.



This declaration of principles applies to our employees in all divisions and subsidiaries. With these standards, we oblige all employees to behave appropriately and lawfully towards colleagues, business partners and suppliers. We expect our business partners and suppliers to also commit to respecting human rights, to establishing appropriate due diligence processes and to passing on these expectations to their own suppliers.

Groups of people particularly worthy of protection

In our endeavours to respect human rights, we focus in particular on the following groups of people along our supply and value chain:

- Our employees at national and international locations, including freelancers and temporary workers
- Employees of our direct suppliers
- Employees of personnel service providers who support us or are hired out to us as part of our service activities

Human rights

We oppose any violation of recognised human and environmental rights. In particular, we stand up for the following human rights:

- Prohibition of child labour
- Prohibition of slavery and all forms of forced labour
- Prohibition of discrimination
- Respect for labour rights and occupational safety
- Adequate remuneration for labour
- Protection of the right to form a coalition, association and collective action
- Lawful use of private and public security forces
- Protection of land rights

Based on the risks considered in the previous sections, we have prioritised the topics of "Compliance with labour rights and occupational safety" and "Appropriate remuneration for work performed" by companies commissioned in the area of personnel services. This prioritisation was based in particular on the type and scope of business activities, the probability of occurrence, the severity of possible violations and the causal contribution to the individual risks.



Furthermore, we condemn any kind of unlawful and negative impact on and destruction of the environment. We also consider sustainability to be an essential principle and of the utmost importance not only for us, but also for future generations. We therefore take our responsibility towards people and the environment extremely seriously. We therefore endeavour to contribute to a sustainable future that meets the needs of society, the economy and the environment.

Implementation of human rights and environmental due diligence obligations

Compliance with human and environmental rights is an ongoing process. The implementation of measures is subject to continuous review and monitoring. If new fields of action arise, we will develop new or adapted measures.

The following measures are already being effectively and bindingly implemented in our group of companies in order to fulfil the requirements of the LkSG (The Act on Corporate Due Diligence Obligations in Supply Chains) and our own standards:

Responsibilities

We have defined responsibilities for the fulfilment of and compliance with all human rights and environmental due diligence obligations. At the highest management level, our Executive Board is responsible for respecting human rights and the environment in all our business divisions and in the respective supply chains.

We have also appointed Mr Henning Jünke, Director of Sustainability, (hjuenke.hv@maritim.de) as Human Rights Officer, who monitors risk management in accordance with the LkSG and ensures implementation by coordinating monitoring activities. The Human Rights Officer reports to the Management Board at least once a year and also on an ad hoc basis.

Other specialist departments are also involved in the operational implementation of human rights and environmental due diligence obligations, which provide personnel resources to ensure compliance with the LkSG and report on their findings regularly and as required. We have also appointed independent ombudsmen who operate the complaints office for us and receive reports.

Compliance with the human rights strategy in all business processes is ensured by our risk management.

Risk analysis

A key component of our due diligence is our knowledge of potential and actual human rights risks and the impact of our business activities on people along the value chain. We have already established processes to identify and prioritise relevant human rights and environmental risk areas and those potentially affected.

In particular, this includes analysing the human rights and environmental risks and impacts of all purchased products and services. Our company-wide risk management system has been expanded for this purpose. If necessary (e.g. in the case of direct suppliers with increased risk), further effective measures are taken.

Preventive measures

In order to fulfil our responsibility to respect human rights and environmental concerns, we rely on several different preventive measures in our own business area and at direct suppliers. Our primary goal is to protect those potentially affected and to identify, prevent or at least minimise adverse human rights and environmental impacts. We have already implemented various types of preventive measures and expanded them based on the risk analysis.

These include, for example:

- Organisational measures (including filling the position of "Sustainability Director");
- Written regulations (e.g. Code of Conduct: <https://www.maritim.com/en/code-of-conduct>);
- System-based and manual controls;
- Processes and guidelines for risk suppliers;
- Direct discussions with key decision-makers in the company and further awareness-raising measures through training on the "Maritim Academy" digital learning platform
- Internal reporting centre in accordance with the HinSchG (The German Whistleblower Protection Act), which is operated by independent ombudsmen from an external law firm.

These measures are particularly relevant for a comprehensive information base as part of effective risk management, for example by optimising reporting and the exchange of information as well as awareness-raising measures.

We will regularly communicate this policy statement and its underlying human rights strategy both internally and externally and expect this policy statement to be adhered to. The values of this policy statement are also taken into account in our Code of Conduct.



Complaints management

An appropriate and effective grievance management system is a necessary component of our due diligence process in order to effectively prevent violations in our company or at our suppliers and to take remedial action if necessary. To this end, we provide publicly accessible and confidential reporting channels through which anyone can report actual or suspected violations by us, our business partners or suppliers at any time.

Our web-based whistleblowing system at <https://www.maritim.com/en/code-of-conduct> is accessible to everyone. Affected parties can use the system to submit reports of all kinds and complaints about us or our direct and indirect suppliers, either anonymously or by name. These reports are then received by independent ombudsmen from the law firm PKF WMS Dr Buschkühle PartG mbB, Martinsburg 15, 49078 Osnabrück, Germany. The information or complaints are then processed after consultation with the respective ombudsman by our Human Rights Officer, who is impartial, independent and sworn to secrecy. The company management is also informed about the complaint. Confidentiality and whistleblower protection are guaranteed at all times. As far as possible and within our sphere of influence, we also ensure that whistleblowers are protected from discrimination and sanctions in connection with their reports and complaints. We have defined, documented and internally communicated processes for the whistleblower system, which are set out in the "Rules of Procedure". These rules of procedure are available on our homepage and on the whistleblower page. The effectiveness of our whistleblower system is reviewed regularly, at least once a year, as well as on an ad hoc basis.

Remedy

The prevention of human rights violations and environmental offences is our top priority. Those affected can point out suspected human rights violations and demand remedial action. If we obtain substantiated knowledge of human rights violations in our supply chain, we work with the responsible parties in cooperation with our business partners to develop a corrective action plan to remedy the human rights violation. Depending on the severity of the violation, we reserve the right to take appropriate action.

Effectiveness review and further development

The effectiveness of all due diligence processes is reviewed at least once a year and on an ad hoc basis.

As we regard the protection of human rights and environmental concerns as an overriding objective, we are committed to the continuous development and improvement of our human rights due diligence processes.

Documentation and reporting

We continuously document our measures to implement the due diligence obligations in accordance with the LkSG. Every measure, including the reasons for the decisions taken, is documented immediately and properly. The documentation must be kept for at least seven years. Our financial year begins on 1 January of each calendar year and ends on 31 December of the same calendar year. We prepare the annual report with all legally required information in accordance with Section 10 (2) LkSG, publish it no later than four months after the end of the financial year and keep it available on our website for at least seven years. We will use the technical tools provided by BAFA (Federal Office for Economic Affairs and Export Control), including the interface for creating the report, to prepare the annual report in accordance with Section 10 (2) LkSG.

Questions and complaints

If you have any questions about this policy statement or other human rights or environmental law related issues, please email our Human Rights Officer at hjuenke.hv@maritim.de. To report questionable behaviour or a possible violation, you can also submit a report at any time via our confidential whistleblower system at <https://www.maritim.com/en/code-of-conduct>.

Entry into force

The policy statement on human rights and environmental risks comes into force on the day it is signed. It was adopted by the Management Board in December 2023 and supplements the existing Code of Conduct.

Maritim Hotelgesellschaft mbH



Erik van Kessel

Chief Operating Officer



Martin Friedrich

Chief Financial Officer