



## **Fundamental Statement on the Human Rights Strategy of Maritim Hotelgesellschaft mbH**

### **Commitment to respect human rights and environmental risks**

We, Maritim Hotelgesellschaft mbH, are committed to respecting human rights and protecting the environment. We pledge to respect human rights and environmental concerns in our business operations and supply chains, ensuring the prevention of human rights and environmental violations, providing access to remedies for affected parties, and taking effective remedial action in the event of violations.

### **Our standards**

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we commit to adhering to 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)
- OECD Guidelines for Multinational Enterprises
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Core Labour Standards of the International Labour Organization (ILO) on Labour and Social Standards
- Charter of Fundamental Rights of the European Union
- European Convention on Human Rights
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes
- Act on Corporate Due Diligence Obligations in Supply Chains

Additionally, our Code of Conduct, available at <https://www.maritim.com/en/code-of-conduct>, forms the basis of our actions as well as the actions of all our immediate suppliers.



This declaration of principles applies to our employees across all corporate sectors and subsidiaries. These standards commit all employees to behave appropriately and legally towards colleagues, business partners, and suppliers. We expect our business partners and suppliers to also commit to respecting human rights, implementing appropriate due diligence processes, and passing on this expectation to their own suppliers.

### **Groups of people particularly worthy of protection**

Our efforts to respect human rights focus particularly on the following groups along our supply and value chains:

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

### **Human rights**

We oppose any violation of recognised human and environmental rights. We particularly stand for the following human rights:

Verbot von Kinderarbeit

- Prohibition of child labour
- Prohibition of slavery and all forms of forced labour
- Prohibition of discrimination
- Preservation of labour rights and occupational safety
- Adequate remuneration for work performed
- Respect for the right to form, join, and act in unions
- Lawful use of private and public security forces
- Respect for land rights

As a result of our comprehensive risk analysis, we prioritise addressing "non-compliance with occupational safety and work-related health hazards," "preservation of labour rights," and "adequate remuneration for work performed" within our supply chains.



We condemn any form of illegal and negative impact on or destruction of the environment. We also consider sustainability a fundamental principle, crucial not only for us but for future generations. Therefore, we take our responsibility towards people and the environment very seriously. We strive to contribute to a sustainable future that meets the needs of society, the economy, and the environment.

### **Implementation of human and environmental due diligence obligations**

Adherence to human and environmental rights is an ongoing process. The implementation of measures is subject to continuous review and monitoring. If new areas of action emerge, we will develop new or adjusted measures.

Currently, the following measures are effectively and bindingly implemented within our corporate group to meet the requirements of the LkSG (The Act on Corporate Due Diligence Obligations in Supply Chains) and our own standards:

### **Responsibilities**

We have defined responsibilities at different hierarchical levels for compliance with all human and environmental due diligence obligations. At the top management level, our management is responsible for respecting human rights and the environment in all our business areas and respective supply chains.

Furthermore, we have appointed Mr Henning Jünke, Director of Sustainability ([hjuenke.hv@maritim.de](mailto:hjuenke.hv@maritim.de)), as our Human Rights Officer, who oversees risk management in accordance with the LkSG and reviews its effectiveness. The Human Rights Officer reports to management at least once a year and on an ad hoc basis, with the exchange being continuously documented.

The operational implementation of due diligence obligations and the organisational embedding of the LkSG is achieved through a core team from various departments (e.g., procurement, HR, legal). This ensures adequate human resources to meet the LkSG requirements. The core team's overarching task is the continuous development and implementation of human and environmental due diligence obligations through cross-functional exchange. The core team specifically manages risk-based prevention and remediation measures in relevant processes within our own business area and concerning suppliers. The core team regularly documents and reports on the operational implementation of due diligence obligations.

We have also appointed independent ombudspersons to operate the complaints office and receive reports.



## **Risk analysis**

A crucial part of our due diligence is our knowledge of potential and actual human rights and environmental risks in our own business area and the impact of our corporate actions on people and the environment along the value chain.

Therefore, we have established processes for annual and ad hoc risk analysis in our business area and with direct suppliers. These processes enable us to systematically identify potential risks and appropriately prioritise them in accordance with LkSG requirements. The risk assessment and analysis are carried out with the support of internal departments and external experts, ensuring we have solid expertise. The primary focus is a comprehensive review of central value chains or departments based on various sources recommended by BAFA (Federal Office for Economic Affairs and Export Control). A rating scheme was developed based on relevant indices and internal criteria for assessing human and environmental risks, allowing for categorisation into low, medium, and high risk. The further evaluation and classification of direct suppliers are carried out via a verified software solution, ensuring compliance with LkSG requirements. Our approach also considers the perspectives of potentially affected stakeholders.

Based on the analysed risks in our supply chains, we have prioritised the topics "non-compliance with occupational safety and work-related health hazards," "preservation of labour rights," and "adequate remuneration for work performed." This prioritisation was made considering the nature and scope of business activities, the probability of occurrence, the severity of potential violations, and the causative contribution to individual risks.

The results of the risk analysis are communicated to both the management and relevant departments within the company. To enable continuous optimisation of the risk analysis, the processes are regularly monitored and reviewed by our Human Rights Officer.

## **Preventive measures**

To meet our responsibility for respecting human rights and environmental concerns, we implement various preventive measures in our business area and with direct suppliers. Our primary goal is to protect potentially affected parties and identify, prevent, or at least minimise adverse human and environmental impacts. Therefore, we have established risk-based processes for implementing preventive measures in our business area and supply chain. We have already implemented various types of preventive measures and expanded them based on the risk analysis.

## **Organisational Measures**

- Appointing a "Director of Sustainability"
- Cross-functional team for integrating due diligence obligations into operational business processes
- Awareness-raising measures through training in key areas and on the digital learning platform "Maritim Academy"
- Optimisation of reporting and information exchange



- Various reporting channels for tips, such as the internal reporting office according to the HinSchG (German Whistleblower Protection Act) and complaint procedures according to the LkSG, operated by independent ombudspersons from an external law firm

### **Guidelines and Declarations**

- Written regulations (e.g., Code of Conduct: <https://www.maritim.com/en/code-of-conduct>)
- Communication of expectations to suppliers and service providers
- Internal and external communication of the fundamental statement

### **Processes**

- Systematic and manual controls for implementing due diligence obligations
- Process for implementing and reviewing preventive measures in our business area
- Process for selecting suppliers and service providers
- Process for risk-based implementation of preventive measures and collaboration with suppliers and service providers

The processes and implemented preventive measures are continuously monitored, adjusted to the risk situation, and reviewed for their effectiveness and appropriateness by the Human Rights Officer.

### **Complaint management**

An appropriate and effective complaint management system is a necessary part of our due diligence process to prevent violations within our company or our suppliers and to take remedial action if necessary. We provide publicly accessible and confidential reporting channels that anyone can use at any time to report actual or suspected violations by us, our business partners, or suppliers.

Our web-based whistleblower system <https://www.maritim.com/en/code-of-conduct> is accessible to everyone. Affected parties can use the system to submit tips and complaints about us or our direct and indirect suppliers either by name or anonymously. These tips are then received by independent ombudspersons from the law firm PKF WMS Dr. Buschkühle PartG mbB, Martinsburg 15, 49078 Osnabrück. The processing of tips or complaints is then carried out in consultation with the respective ombudsperson by our Human Rights Officer, who is impartial, independent, and obligated to confidentiality. Additionally, the company management is informed about the complaint. Confidentiality and whistleblower protection are always guaranteed. As far as possible and within our sphere of influence, we also ensure that whistleblowers are protected from disadvantages and sanctions in connection with their tips and complaints. We have defined, documented, and internally communicated processes for the whistleblower system, which are presented in the "Procedural Rules." These procedural rules are available on our website and on the whistleblower page. The effectiveness of our whistleblower system is regularly reviewed at least once a year and on an ad hoc basis.



### **Remediation**

Our responsibility includes preventing negative impacts on human rights and the environment. If we gain substantiated knowledge of imminent or actual violations of human or environmental obligations in our supply chain or our business area, we will take remedial action in accordance with applicable laws to prevent, end, or mitigate violations.

Both our process for remedial measures in our business area and the process for remedial measures with (in-)direct suppliers involve continuous collaboration with affected parties and perpetrators. We first investigate the causes of imminent or actual violations to develop suitable concepts and implement appropriate measures.

In our business area, the measures taken always aim to end the violation immediately. If these are not sufficient, we reserve the right to take labour law measures against the perpetrator in accordance with applicable laws.

If the violation in the supply chain cannot be ended within a foreseeable time, Maritim Hotelgesellschaft mbH will develop and implement a suitable concept in cooperation with the (in-)direct suppliers to end or reduce it.

Depending on the severity of the violation, we reserve appropriate reaction options, such as suspension or, as a last resort, termination of a contractual relationship.

### **Monitoring and further development of effectiveness**

The effectiveness of all due diligence processes is reviewed at least once a year and on an ad hoc basis. Since we consider the protection of human rights and environmental concerns to be an overarching goal, we commit to continuously developing and improving 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. Each measure, including the reasons for the decisions made, is promptly and properly documented. The documentation is kept for at least seven years. Our financial year starts on January 1st of each calendar year and ends on December 31st of the same calendar year. We prepare the annual report with all legally required information in accordance with § 10 para. 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. For the preparation of the annual report in accordance with § 10 para. 2 LkSG, we will use the technical tools provided by BAFA, including the interface for report creation.



### Questions and complaints

For questions regarding this fundamental statement or other human rights or environmental rights-related issues, please contact our Human Rights Officer by email at [hjuenke.hv@maritim.de](mailto:hjuenke.hv@maritim.de).

To report questionable behaviour or a possible violation, you can also submit a report at any time through our confidential whistleblower system at <https://www.maritim.com/en/code-of-conduct>.

### Entry into force

The fundamental statement on human rights and environmental risks comes into force on the day of its signing. It was adopted by the management on 1st August 2024 and supplements the existing Code of Conduct.

Maritim Hotelgesellschaft mbH

A handwritten signature in blue ink, appearing to read "Erik van Kessel".

Erik van Kessel

Chief Operating Officer

A handwritten signature in blue ink, appearing to read "Roland Elter".

Roland Elter

Chief Commercial Officer

A handwritten signature in blue ink, appearing to read "Martin Friedrich".

Martin Friedrich

Chief Financial Officer