

Rules for our supply chain complaints procedure pursuant to section 8 of the LkSG

of DSR Hotel Holding GmbH

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1. Rules for our supply chain complaints procedure pursuant to section 8 of the LkSG

1.1 WHO IS RESPONSIBLE FOR COMPLAINTS RELATING TO HUMAN RIGHTS AND ENVIRONMENTAL ISSUES?

The central Sustainability and Compliance department at DSR Hotel Holding GmbH is responsible for setting up this complaint procedure. If you have any further questions about the complaints procedure and the corresponding processes, a coordination team consisting of representatives from different departments at DSR Hotel Holding GmbH (referred to as the **'Internal Coordination Body'** in this document) is available at [t supplychain@dsr-hotelholding.de](mailto:supplychain@dsr-hotelholding.de).

1.2 WHO CAN LODGE COMPLAINTS? WHAT COMPLAINTS ARE WORKED ON?

These procedure rules apply in particular to our employees, employees of direct or indirect suppliers and other parties directly or indirectly affected as well as their representatives (referred to as **'whistle-blowers'** in this document). Potential risks with regard to human rights and environmental issues or breaches of obligations (referred to as **'incidents'** in this document) can be reported accordingly using the German Supply Chain Due Diligence Act (LkSG) complaint procedure

1.3 SHOULD CONSEQUENCES BE FEARED IF A COMPLAINT IS MADE?

Whistle-blowers are given special protection. Whistle-blower protection applies to all internal and external employees as well as to business partners, job applicants and other external third parties. This also applies regardless of whether the whistle-blower is themselves affected by the reported incident. As a rule, DSR Hotel Holding GmbH and the corresponding departments will not tolerate any negative consequences due to reports or complaints and will, in individual cases, indicate specific measures that employees or suppliers can expect if whistle-blowers are exposed to negative consequences. Every report is investigated.

Reports are processed and corresponding investigations carried out fairly, objectively and confidentially. The response is carried out the same way regardless of origin, nature and severity. The applicable data protection regulations are observed.

ATTACHMENT 2

Link to whistle-blower system for DSR Hotel Holding GmbH [Supply Chain Due Diligence Act – DSR Hotel Holding \(dsr-hotelholding.de\) Hintbox](#)

1.4 HOW ARE EMPLOYEES PROTECTED?

In order to protect employees, reports and their descriptions are anonymised by the Internal Coordination Body in certain cases when reports or incidents are particularly sensitive. It should not be possible to draw conclusions about specific employees or groups of employees when these incidents are processed further. Anonymisation does not apply if the Internal

Coordination Body concludes during the initial assessment that a serious violation of human rights or environmental concerns is to be feared and unforeseeable damage to third parties has to be averted.

1.5 IS THE RESPONSIBLE COORDINATION BODY INDEPENDENT?

The Internal Coordination Body is a committee tasked with independently and objectively examining and following up on reports received.

1.6 HOW ARE BARRIERS AVOIDED IN THE ACCESS TO THE COMPLAINTS PROCEDURE?

As part of its membership of DER Touristik and therefore the REWE Group, DSR Hotel Holding GmbH will take the following measures in particular to avoid barriers to accessing the complaints procedure:

Together with Hintbox as a website-based complaint channel, an online data entry screen is provided which is easy to find and with which reports (hints) can be submitted, including via voice recording.

Information on and access to the complaint channels is ensured in several languages, and at least in German and English. This procedure does not entail any costs for the whistle-blower and no additional special technical aspects (apps, downloads) are necessary.

The Internal Coordination Body deals with incidents reported by whistle-blowers. Negative consequences for whistle-blowers are not tolerated. In the case of sensitive reports, the information is anonymised. Barriers to accessing the complaints procedure are avoided with various measures.

Reports can also be made via the existing email address: supplychain@dsr-hotelholding.de

2. Details of the complaint procedure

2.1 SUBMITTING A COMPLAINT:

Whistle-blowers have the option of sending reports anonymously or with their contact details via the following channels:

Email address: supplychain@dsr-hotelholding.de

Website: [Hintbox](#)

Reports are not evaluated or processed based on priority. Rather, this occurs immediately in accordance with predefined processes and requirements.

2.2 DOCUMENTING RECEIPT

Every report made via the aforementioned channels is recorded and documented using software-based Hintbox as a central documentation tool. This applies not only to the receipt of the report, but also the entire duration of the processing and the statutory retention period.

2.3 CONFIRMING RECEIPT TO WHISTLE-BLOWER

After receiving the report, the responsible Internal Coordination Body sends confirmation of receipt to the whistle-blower(s). The confirmation of receipt is sent immediately based on the complaint channel used by the whistle-blower. If a confirmation of receipt cannot be sent, for example because the whistle-blower has not provided any contact details, no confirmation of receipt will be sent. This does not apply to Hintbox, where a confirmation of receipt is possible due to the provision of an anonymous messaging function.

2.4 COMMUNICATING TO WHISTLE-BLOWERS

The Internal Coordination Body will endeavour as soon as possible to give the whistle-blower an initial reply, and within three months of the confirmation of receipt at the latest. The Internal Coordination Body will inform whistle-blowers of the measures taken. The Internal Coordination Body will endeavour to provide whistle-blowers with a final response regarding the incident within six months of the confirmation of receipt. Where a more complete or in-depth investigation is required, the feedback may in some cases be provided at a later date. A corresponding status update regarding the further clarification of the potential incident is provided to the whistle-blower if possible. Complaints can be submitted via several channels. Every report is recorded, documented and stored using software.

2.5 CHECKING PERMISSIBILITY

The Internal Coordination Body checks the permissibility of the report and the relevance to the LkSG. A report is permissible if it contains sufficient and plausible information about a potential incident such that further processing is possible. A report is relevant if a review of it reveals that there are indications of human rights or environmental risks in the supply chain or in the company's own field of business. In other respects, a report is also relevant if it incorporates potential breaches of the provisions of the LkSG that are caused by the company itself or its direct or indirect suppliers.

There are three possible courses of action from this review.

Action 1: The report is permissible and relevant to the LkS

→ continue to point 2.6

Action 2: The report is not permissible

→ continue to point 2.10

Action 3: The report is not relevant to the LkSG, but is still relevant

→ The report may have to be investigated by other departments due to other relevance to their own business area.

Once a report has been received, the next steps are determined by the Internal Coordination Body according to the extent to which the coordination body considers the report to be permissible and relevant to the LkSG.

2.6 CONDUCTING INITIAL EVALUATION

The report will be investigated further if it is plausible and conclusive. The potential hint or report will be followed up on if, based on the information provided – in particular the whistle-blower's description of the facts, the evaluation of the documents submitted by the whistle-blower in the individual case and other readily accessible information – a human rights or environmental risk or a violation of the provisions of the LkSG is probable.

There are no excessive demands placed on the conclusiveness of a report, but the suspicion must be based on specific, possible or probable facts and indications. As soon as this is the case, the procedure progresses to either step 2.7 or step 2.8 and the complaint is clarified further internally. An admissible report with relevance to the LkSG is investigated further if the examination of all available documents shows that a human rights or environmental risk or a violation of the provisions of the LkSG is probable.

2.7 CONDUCTING DISPUTE RESOLUTION PROCEEDINGS

DSR Hotel Holding GmbH always aims to clarify possible reports, find solutions or offer support for an amicable resolution. The prerequisite for this is that the whistle-blower is also the person affected by the potential violation. In such a dispute resolution, a common solution is found to settle the complaint. If the whistle-blower accepts the offer of dispute resolution, the Internal Coordination Body will work together with the relevant departments to find a solution with the whistle-blower and, if necessary, with the help of a neutral and intermediary third party and initiate corresponding measures. However, the LkSG does not provide any obligation to conduct dispute resolution proceedings. DSR Hotel Holding GmbH is under no obligation to provide compensation to whistle-blowers. If an amicable solution is not possible or, in the event of dispute resolution, an amicable solution is not implemented or no solution is reached, the provisions in point 2.8 apply and the complaint will be clarified further internally.

2.8 CLARIFYING THE COMPLAINT INTERNALLY

Generally, the Internal Coordination Body involves other stakeholder groups in the internal investigation process.

a) The Internal Coordination Body sends an investigation request to the responsible departments, which are requested to carry out the following additional process steps to clarify the report:

Defining investigation steps: The departments define the necessary investigation steps in order to investigate the report and ultimately determine the facts of the case.

Defining measures for investigation: The departments themselves define the appropriate measures required in the individual situation to establish the facts of the case. Depending on the investigation and the probability of occurrence, other departments, including the management, are consulted and further investigation steps are defined.

Documenting feedback: The result of the assessment of the facts is reported to the Internal Coordination Body and documented.

Identifying measures in coordination with the relevant departments: The decisions and measures are implemented and communicated. The responsible department is then requested to carry out further investigation steps to clarify the report.

b) As part of the affiliation with the Rewe Group, the central REWE Risk Management department can be involved in order to further assess the report.

2.9 TAKING MEASURES

If the investigation of the report reveals the existence of a risk or injury, appropriate preventative or corrective measures are taken (points 2.7 and onwards). These measures can be taken from a predefined catalogue of measures, or designed and implemented individually on a case-by-case basis. The specific design, implementation and review of the implementation of the measures is the responsibility of the respective department.

2.10 PROVIDING FINAL INFORMATION TO THE WHISTLE-BLOWER

The whistle-blower is transparently informed of how their complaint has been dealt with and what measures have been taken.

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