



LINDNER
HOTEL
GROUP

BE VIP!

our code of conduct the
principles for our actions
and behaviour



“It is not only for what we do that we are held responsible, but also for what we do not do.”

Molière, French playwright and actor

PREFACE

dear colleagues,

It is with pleasure that we present to you the revised Code of Conduct.

The Code of Conduct was updated to reaffirm our commitment to upholding the law and to underline the high standards we set with regard to responsible behaviour towards our guests and business partners and with each other within our company.

Regardless of where we work and what role we perform: The Code of Conduct applies equally to each one of us – to the Management Board and Supervisory Board, to managers and to every single employee.

Because for us as a family-run business, it is essential that we have a common language and guidelines to strengthen and maintain our values. We are convinced that business has to be conducted honestly and fairly while respecting other people, their dignity and their rights. After all, the trust we gain from our business partners is key for our sustained success as a company.

Here, one thing is particularly important to us: We do not intend just to comply with legal requirements

and regulations or avoid potential penalties. It is also important that each one of us can also actually follow the principles. The Code of Conduct helps us to understand these and to act accordingly.

Therefore please take the time to read the Code of Conduct carefully and actively contribute to its implementation. If you have any questions, please contact the Corporate Risk and Compliance Manager or us. We will help you to do the right thing.

Each one of us makes an extraordinary contribution to the success of our company. We thank you for your daily commitment and efforts to meet our standards to the highest quality.

Kind regard

The Management Board and Supervisory Board
of Lindner Hotel Group



“One should not take anybody’s responsibility away, but one should help everyone to bear his responsibility.”

Heinrich Wolfgang Seidel
pastor and writer

BE VIP!

dear colleagues,

The hotelier lexicon states that a VIP is a very important person who also has a positive effect on the hotel’s public image. And that is precisely what you are: an extraordinarily important person for our team and our company!

And just as important as you are to us, it is also important that we always work on a motivating, stimulating and appreciative corporate culture. And it is for this reason that I would like to encourage you to follow the motto of our Compliance Management:

Be
V(erantwortungsvoll)
I(nteger)
P(flichtbewusst)!

Be Responsible, act with Integrity, have a Sense of duty.

Because it is not enough just to print out and hang up the principles for our actions and behaviour. Instead each one of us has to set a good example, take our principles to heart and apply them in our everyday work. Because acting with integrity means that it is not only in our thoughts that we act in accordance with our own standards, values and beliefs, but also in our actions.

Our Compliance Management System shows us the appropriate rules

within which everyone can act independently and responsibly on a secure basis.

After many years of service, our old Code of Conduct is now being replaced by a new one – one which more alive, more detailed and easier to understand.

It should serve as an aid and help us to understand the most important principles for our lawful actions and behaviour in business. In the new Code of Conduct we find many examples and recommendations for action for situations we have perhaps already experienced. We will, however, experience time and again new or different situations for which there is no solution in the Code of Conduct. But even if there is no standard solution, we want to behave the same way we expect and would like others to behave.

Let’s create together a corporate culture which our guests, business partners and we can trust. Let’s make a conscious effort to be VIPs. Always remember: It is only by really acting in accordance with our values and rules and standing together as a team that we will be able to accomplish our mission and be not just better, but different.

I am here for you at all times and will help you to bear your responsibility.

Janina Eigen, Corporate Risk and Compliance Manager



contents

Preamble	08
Treat each other respectfully and fairly	12
Create good working conditions – ensure health and safety	14
Accept social responsibility	16
Corruption and granting benefits	18
Donations and sponsorship	23
Free, fair and undistorted Competition – no cartel agreements	24
Business decisions, gifts And secondary employment – but please no conflicts of interest	26
Sustainability, energy efficiency and protection of the environment – responsible use of resources	28
Controlling and finance – legal control of data and information	29
Trade restrictions and boycotts	30
we protect what needs to be protected – trustworthy handling of personal data, confidential information and company property	32
What we expect of our business customers	34
handling violations	35

IMPRESSUM

Lindner Hotels AG
Emanuel-Leutze-Straße 20
D-40547 Düsseldorf

Tel.: +49 211 5997-310
Fax: +49 211 5997-348
info@lindnerhotels.com
www.lindnerhotels.com

For the sake of simplicity, only the male form is used.
All terms referring to persons apply equally to male,
female and diverse gender identities. Again for the
sake of simplicity, the term "Lindner" is used for all
operations Lindner Hotel Group.

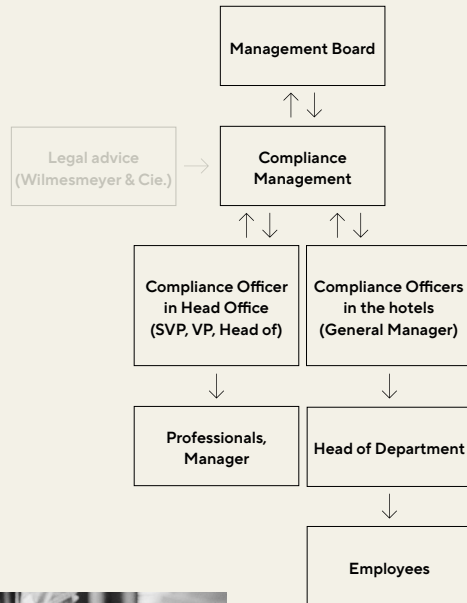
Date: July 2023. The current version available at
lindnerhotels.com/compliance
will always apply.



preamble

● To whom does the Code of Conduct apply?

Every Management Board and Supervisory Board member, every manager and every employee is called upon to comply with the applicable, company-specific and statutory rules and regulations in their professional activities and to actively ensure the implementation of the Code of Conduct. In particular the company management and managers are responsible for setting a good example and ensuring that all employees who report to them are familiar with the content of the Code of Conduct and follow the guidelines that apply to them.



Every employee is part of our Compliance organisation

● Why is the Code of Conduct so important?

We are proud to be a trusted and reliable employer, host and business partner. Our values of responsibility, integrity and sense of duty provide the framework for this and help us to understand what is desired, allowed or not allowed. We are convinced that sustained success can only be achieved if our daily actions follow ethical principles which are met with acceptance and are understood.

Our Code of Conduct gives expression to these principles and defines a framework within which we can act independently and responsibly. It also contains further information and resources to protect Lindner and every single one of us against risks.

? **Has our Compliance Management been designed to comply with a specific standard?**

Yes. The Compliance Management System has been designed to meet the requirements of IDW PS 980 and ISO 37301. The system was designed taking into account the key basic elements of compliance culture, compliance organisation, compliance goals, compliance risks, compliance programme, compliance communication and compliance improvement and monitoring.

? **What do I do if an issue is not addressed in the Code of Conduct?**

Naturally, it is not possible for all conceivable situations which occur in the course of our activities to be addressed in the Code of Conduct. It is therefore the responsibility of each individual to familiarise themselves with the Standards. But even in the case of situations for which no guideline has been formulated or for which there is no direct instruction, it should be possible to act in an ethically correct manner. Using one's common sense will often help. If any doubts remain, your superior or the Compliance Department will be happy to help you.

☰ **The content of the basic elements of our Compliance Management System is explained on YoCu under "HQ Compliance".**

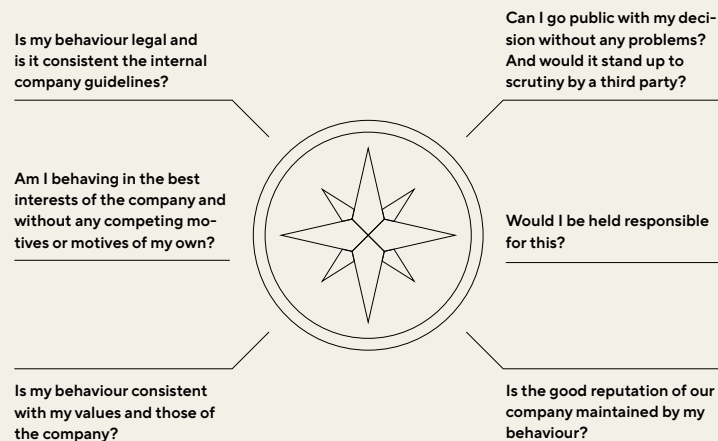


● The inner compass as a guide for decision-making

In psychology the term “self-efficacy” is used: This describes an individual’s belief to cope with difficult situations and challenges in their capacity to act in the ways necessary to reach specific goals by themselves. But it is not always easy to tell whether a decision is consistent with the requirements of our Code of Conduct. Here the “inner compass” can be an effective guide.

If all of the questions can be answered with “Yes”, there is a high probability that the behaviour is acceptable. If any doubts remain concerning any of these questions, you can rely on the qualified advice of a superior or the Compliance Department.

SIMPLY ANSWER THE FOLLOWING QUESTIONS:



● Compliance knowledge

It is our goal to provide each individual with the information they need in order to avoid violating laws, the Code of Conduct and other Lindner Standards.

And how do we get this information?

- By attending a Compliance training course.
- By reading the Compliance Standards.
- By watching our Compliance learning videos.
- By following and regularly reading the YoCu page “HQ Compliance”.
- By asking our superiors or our Compliance Department.

How is the Code of Conduct reviewed or amended?

The Code of Conduct is validated on an ongoing basis by the Compliance Department in order to determine whether adjustments need to be made due to changes in law or developments in our company or business environment.



Our responsibility starts here!

Let us know if you have any suggestions for improving the Code of Conduct or Standards. Because in particular your specialist knowledge and personal expertise are extremely valuable and help to continually improve our system.

Who can help me with Compliance Management issues?

The following person will help you with advice and support:

Corporate Risk and
Compliance Manager
Janina Eigen
Emanuel-Leutze-Straße 20
40547 Düsseldorf
Mobile +49 162 2444720
compliance@lindnerhotels.com



treat each other respectfully and fairly



Further information is provided in our company guideline "Partnership-like behaviour at the workplace" on YoCu.

Where if not in tourism?! Sustainable tourism is characterised by a colourful mix of languages and ways of life. We are convinced that the exchange of cultures enriches our company and our world and that "tourism" and "xenophobia" are mutually exclusive.

We treat each other fairly and respectfully and for us tolerance and honesty are indispensable values of our corporate culture. By treating each other with respect, we can realise what we have in common, understand work performed by colleagues from cultures that are unfamiliar to us and work together constructively.

Everyone should be able to expect to be treated in a friendly, trusting and business-like manner. We promote equal employee development opportunities and personnel decisions are made exclusively on the basis of talent and ability. No one is treated improperly, harassed, disadvantaged, favoured or excluded due in particular to their race, ethnic origin, skin colour nationality, faith or ideology, gender, physical constitution, disability, age, appearance or sexual identity.



I notice a colleague making fun of another colleague who needs to use a walking stick following an accident. Even though the derogatory comment was not aimed at me, I felt it was cruel and condescending. What should I do in such a situation?

Do not close your eyes and ears! Perhaps the colleague just wanted to make a joke and did not have any mean intentions; but even comments which are not meant seriously can be insulting or discriminating. If you witness such behaviour, you should talk to the person who told the "joke" and tell them that such behaviour is out of order. Depending on the situation or the reaction of the person you have confronted, a discussion with your superior or a central contact may be advisable.



Under no circumstance do we tolerate any form of discrimination, harassment, bullying or any other inhuman behaviour. Everyone can rely on support from Lindner when it comes to creating a working environment which is characterised by mutual respect and tolerance and in which conflicts can be resolved in a proper manner.

What Lindner expects from all employees:

Every individual is an important part of our team. And it is only as a team that we can maintain peaceful labour relations and a good working environment. We should never forget that successful teamwork is based on respect and mutual appreciation. For this reason, we have to allow different opinions, address concerns openly and seek solutions together.

What is expected from board members, department heads and all managers:

Managers are responsible for the employees who report to them and play an important role in meeting the duty of care. All managers have a role model function. In particular, their behaviour should contribute particularly to a good working environment – for this purpose they respect the personal integrity and self-esteem of all employees. They always do their best to make it possible for their employees to meet their work targets and to motivate them to give their best performance. They make sure their employees are fully

informed and encourage them to communicate openly and act honestly with each other. They also offer their employees the opportunity to exchange ideas with them openly and actively participate in conflict resolution processes.



Aren't discrimination, harassment and bullying the same thing?

No, the terms may be closely related, but they do not mean the same thing. Discrimination is the belittlement of employees through verbal or written comments and actions of a derogatory nature due to their age, descent, disability, personal characteristics or beliefs, gender, origin, nationality, religion, physical and/or mental illness or sexual identity. Harassment is understood to be verbal, physical or visual harassment, the purpose or effects of which are offensive, hostile or threatening situations. Bullying is according to the definition of the Federal Labour Court the systematic hostility, victimisation or discrimination by employees among each other or by superiors. This includes in particular behaviour which aims to violate the dignity of the persons affected or will create an environment characterised by intimidation, hostility, humiliation, degradation or insults.



create good working conditions – ensure health and safety

We attach great importance to providing our employees with a good, safe and healthy working environment. We accept responsibility for the health and safety of our employees, try to reduce risks and ensure the best possible measures are in place to prevent accidents, injuries and illnesses. Because we are sure that only optimal working conditions lead to optimal results.



I notice that the high-level shelving with our cleaning products on it has not been put up safely and think that it will fall over the next time it is bumped into. Do I have any duties?

Yes, if it is possible, take the corrective action yourself and report the issue to your superior. Every individual shares responsibility for protecting man and the environment in their workplace. In addition, every manager is required by law to instruct and support employees in meeting this responsibility.



The taking of drugs and consumption of alcohol during working hours are strictly prohibited for employees.

OUR ELEMENTARY COMPONENTS TO MEET THE DUE DILIGENCE REQUIREMENTS

Protection against discrimination	Protection against slavery and forced labour	Protection against torture
Protection against unlawful seizure of land	Recognition of the freedom of association	Ban on child labour
Adequate wage and compliance with the Working Time Act (Arbeitszeitgesetz)	Safe and healthy work environment	
Ban on causing harmful soil changes and water pollution		
Ban on trading of illicit drugs, arms, organs, antiquities, protected species, products or substances		

health and safety



Further details are explained in our Standards. For example, our Standards include information on health and safety at work in the BAAKS documents or a breakdown of the Working Hours Act (Arbeitszeitgesetz) in the Compliance Standard CM_LH_011.



accept social responsibility

Corporate Governance no longer means just maximising profit. Ethics and business are closely intertwined and are rightly demanded more and more by society.

The promotion and respect of human rights is for us just as essential and irreversible as the strict rejection of child and forced labour or work based on slavery or human trafficking.

Because social responsibility, trust, commitment, transparency and honourable management are not just empty promises for us, but important elements of our corporate strategy.

We are aware that integrity and honesty are based on voluntary and self-controlled behaviour.

We know that we can only accept this social responsibility if we all pull in the same direction. The Management Board and Supervisory Board, managers and every single employee are called on equally to accept responsibility. Everyone can play a part by acting as a good role model, including ethical criteria in a decision-making process and being alert to risks, conflicts and dangers.



I would like to work on a voluntary basis for a charitable organisation. Am I allowed to do this?

Civic engagement is more important than ever. We think it is great when our employees take social responsibility so seriously. Regardless of whether you would like to coach children and young people in a sports club, help in the school parents' association, look after refugees, work in the voluntary fire service, look after old people or take on other similar roles. Talk with your superior so that you can balance your work at Lindner and the voluntary work, and obtain permission for the work in your spare time from your personnel officer – then nothing will stand in the way.



corruption and granting benefits

We know our industry and are proud of the variety and action it offers. However, we are also aware of the dynamic of constant change in the hotel industry and recognise the increasingly intense and international competition.

All the same, no one should think that they are called on to do business at any price. Quite the opposite! We want to have only business partnerships which are based on fair and lawful decision-making. In connection with our work, no personal benefits are allowed to be asked for, accepted, offered or given which induce a third party to behave corruptly or create an unfair commercial advantage. Even the mere hint of influencing is to be avoided. Everyone has to adhere to this principle – regardless of the location and culture, even if such gifts are expected or “customary”.



Examples of possible unlawful gifts and benefits:

- Cash, cheques, transfers, gift vouchers
- Free or discounted goods or services
- Dinners, travel or invitations to events
- Offers of employment
- Intangibles, such as valuable information or personal favours
- Donations to certain non-profit organisations



What is corruption?

Corruption is generally defined as improper action or omission in a decision-making process due to unlawful influencing with a personal advantage given or accepted. Typically, corrupt practices involve the misuse of a function or position and the associated obtaining or seeking of personal benefits, with at the same time the concealment of these actions.



Am I allowed to keep my tip?

The accepting of cash is generally prohibited. An exception can be made for tips which you routinely receive in the course of your work.



● Transparency and disclosure

Gifts do not need to be categorically banned. Good work and loyalty are allowed to be rewarded or events which are consistent with our guidelines are allowed to be attended. However, it is essential that gifts are consistent with our Standards, legal, customary for the type of business and ethical.

This means among other things that

- the accepting and giving of gifts can be clearly traced at any time.
- only gifts of moderate value can be accepted or given.
- gifts are accepted and given only if they have not been asked for and no counterperformance is necessary
- the accepting and giving of gifts is free of conflicts of interest.

Everyone should ask themselves beforehand whether a gift or invitation is overly generous and whether they enter into any obligations with the gift. If you are unsure whether a gift is acceptable or not, seek advice from your superior or the Compliance Department before you accept or give the gift.



Specific examples of how to behave, value limits and approval levels to ensure employees act correctly when giving and accepting gifts, invitations to dinners and invitations to events are explained in our Standard "CM_LH_001 Accepting and giving gifts"

See our Anti-corruption Policy for further issues and information.

● Journalists, bloggers, influencers & co. – Can we convince them without giving bribes?

First-class service, comfortable beds in a beautiful hotel room, a spa area for relaxation or a delicious dinner in a great atmosphere. For many companies, "gifting" a hotel stay can leave a bitter aftertaste and give rise to suspicions of corrupt activity.

But does this also apply to us? How can we convince journalists, bloggers or influencers of our services if they do not test the new mattresses or experience the extraordinary atmosphere of the stylish roof-top bar with a delicious cocktail themselves?

In order to arouse interest in the special and unique features of the services we offer, press trips and influencer marketing are useful and necessary.

However, this does not mean that anyone who asks for a "test stay" will get one. Press trips, blogger relations and influencer marketing are subject to clear guidelines which need to be considered by everyone.

What needs to be taken into account in dealings with journalists, bloggers, influencers & co.?

- 1 Invitation sent and offer approved only after consulting the SKM Consultants.
- 2 Journalists, bloggers and influencers have to work transparently and make the financing of invitations and products known.
- 3 No one is allowed to be influenced or hindered by accepting gifts, invitations or discounts.
- 4 Journalists, bloggers and influencers decide alone whether, when and how topics are reported.
- 5 No one is allowed to be forced or bribed with gifts to write a (positive) report or make a (positive) publication.



donations and sponsorship

As a family business, accepting social responsibility is dear to our heart. By making donations, we would like to champion good causes effectively and sustainably and make a social contribution for the good of all. We expect nothing in return for a donation.

Sponsorship differs from donations. When we make sponsorship payments, we require something in return – for example the prominent placement of our logo. The sponsorship therefore acts as a marketing instrument to raise awareness of ourselves and to promote a positive public image of our company. While adhering to applicable laws and local regulations, we support education, science, culture, social causes and sport and environmental projects.

Donations and sponsorship payments are made exclusively on a voluntary basis.

Transparency is of paramount importance. Lotteries and the like which are organised or sponsored by us are always subject to ethical and legal requirements. The operation of unfair games of chance and competitions is expressly prohibited.



In my city, the “City Art Prize” is awarded every year to a regional artist and presented at a public event. The event organiser, a non-profit association, is seeking donations for the raffle which will be held at the event. My hotel would like to donate a voucher. What do I need to consider?

We consider the funding of non-profit organisations to be an important part of our corporate culture. If the value of the voucher exceeds the value that does not require approval, the donation has to be first approved by Head Office or the Management Board. When awarding a “Compli voucher”, in particular the guidelines for issuing a Compli voucher need to be considered.

If it concerns sponsorship, because it has been agreed that we will get something in return, different procedures apply. These are explained in the Standard and are to be adhered to. A sponsorship agreement may need to be concluded.



Further information is provided in our Standards “CM_LH_026 Issue of Compli vouchers”, “CM_LH_032 Donations and sponsorship” and “ADM 01D031 Donations”



free, fair and undistorted competition – no cartel agreements

We can hold our own in the market and survive the competition due to the outstanding quality of our services and our unique and individual hotels and locations. Lindner is committed fully to the market economy and free and open competition. Even if the competition and cartel laws are not always easy to understand, we must comply with them at all times and ensure that our conduct in dealings with our competitors remains within the law.

Therefore no one is allowed to collude with competitors to agree prices or offer conditions, to limit supply or divide up the market. Furthermore, contract tendering or award procedures have to be transparent and without any influence. Even the mere hint of a violation is to be avoided. We must abide by this not only in dealings with competitors, but also in interactions with suppliers and customers.



If I bump into a former colleague at a training event. He tells me that he now works in sales for another hotel company. He is excited by his new job and would like to tell me about the upcoming sales campaign which is currently being planned for the hotel. I am pretty sure he shouldn't do this. I tell him so and also politely change the subject. Is this the right thing to do?

Yes, it is! There are subjects which you are allowed to discuss with persons from other companies. They include for example scientific developments and changes in law. However, as a general rule they do not include competition and strategy. The decision to change the subject early on was therefore commendable and right. If your former colleague does not understand the reaction, it can do no harm to explain to him why you had to change the subject.



In my region, regular industry meetings are held which are also attended by our competitors. The director of a competitor would like to use the gathering to talk about future pricing at the time of trade fairs. She says that we rarely get the opportunity to discuss with so many "like-minded people" and that we could discuss pricing for information purposes only. Is this allowed, and what should I do?

No. The sharing of price information could be considered to be an attempt to agree prices. In discussions concerning prices or price-setting, you must always be very careful. For this reason, you could try to politely end the awkward discussion with the director. If this is not possible, as a precaution you should no longer participate in the industry meeting and ask for your early exit to be recorded in the minutes.



Further information is provided in our Standards "CM_LH_005 Cartel law – correspondence with competitors" and "CM_LH_006 Compliance in association cartel law".



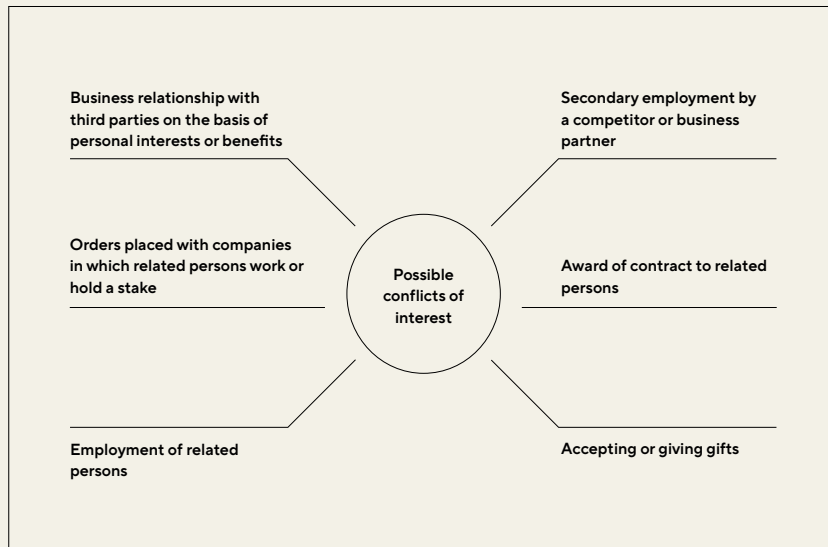
business decisions, gifts and secondary employment – but please no conflicts of interest

Cooperation with our business partners is based on honesty, clarity and fairness in what we say and how we behave. All decisions made by our employees in the name of Lindner are without bias and fair, based on factual and neutral reasons and are consistent with Lindner's best interests.



What is a conflict of interest?

A conflict of interest exists when personal or one's own financial interests influence business decisions. Although a conflict of interest in itself is not an offence, how it is handled might be. Situations where personal interests conflict with the interests of Lindner or our business partners must therefore be avoided.



What needs to be considered if you find yourself in a conflict of interest?

- 1 Tell your superior immediately about the potential conflict of interest.
- 2 After the disclosure, the superior has the right to decide whether to approve this business process. For this purpose, it is examined whether there is a solution in which Lindner's interests are not harmed.
- 3 It must be ensured that third parties are not disadvantaged and all business relationships and processes are based on objective criteria.

Your personnel officer is to be informed of any paid secondary employment before you take up such a position. The personnel officer will then check for any conflicts of interest. As a Lindner employee, you are not allowed to commence any secondary employment without prior approval. This also applies to freelance or voluntary work.



At our breakfast buffet we would like to offer regional delicacies in the near future. My superior has asked me to test the products in a number of pastry shops. Some of the products are made by a good friend, who recently opened a pastry shop. I personally am impressed by her ability and baking. The products are also among the cheapest. What should I do?

In such a situation, transparency and disclosure are especially important. In order to act properly, inform your superior of the personal relationship with the pastry shop. Let him know your objective and unbiased opinion following the product testing and stay out of the remainder of the decision-making process.



Further information is provided in our Standard "CM_LH_013_Conflicts of interest".



sustainability, energy efficiency and protection of the environment – responsible use of resources

We as a company, and every single one of us, are responsible for the protection of the environment and the careful use of energy and natural resources.

We are fully committed to meeting the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichten-gesetz). For us, it is only natural that we systematically identify and eliminate risks that result in human rights violations or are a threat to the wellbeing of man and the environment. Not only we, but also our suppliers are committed to this!

Generally, we have practised and attached great importance to sustainability for many years. However, we do not want to just meet our statutory operator responsibility with regard to protection of the environment, we are going a step further: No audit is too severe for us, no requirements are too much for us – we have been undergoing scrutiny for many years and allowing the outstanding sustainability of our hotels to be audited and certified by an independent company.

In addition to the measures introduced for intelligent air-conditioning, energy saving and protection of the environment, we would like

to step up our sustainable and resource-friendly management and make it even more professional.

In order to protect the environment and save it for future generations, it is necessary that we all – the Management Board and Supervisory Board, managers and every single employee – pursue the same goals and do our best

- to limit emissions that are harmful to health and the environment to a minimum
- to prevent, eliminate or at least reduce to a minimum negative impacts on the environment
- to encourage the environmental awareness of employees and colleagues and to motivate them to act in an environmentally-conscious manner



controlling and finance – legal control of data and information

We follow unquestioningly the principles of lawful, complete and truthful accounting. All of us who are responsible for providing information ensure at all times that all business data is recorded in an accurate, traceable, timely and complete manner and that all relevant laws, guidelines and regulations are complied with. This applies without exception to all business processes – from the retention period for registration forms to the preparation of the consolidated financial statements.



Our chef has asked me to recognise the costs for the duplicate meat order in the next quarter. He says the duplicate order had only been placed by mistake and by doing this we would meet the budget targets precisely. Is this alright?

No. Even if it is a mistake and the budget would be met by doing this. These expenses must be recognised in the period in which they were incurred. Otherwise our records would not be truthful, accurate and complete.

Regardless of how unimportant a role may appear, if we engage in only minor criminal behaviour such as misappropriation, theft, extortion or fraud, there will be serious consequences.

In this connection, there is no “I didn’t know”. If you suspect dubious activities, disclose this immediately.



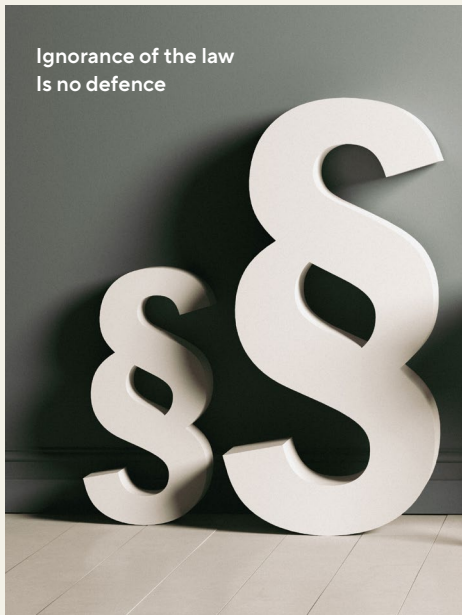
Detailed information is provided in our Finance & Accounting-Standards.




● Trade restrictions and boycotts

Usually, trade restrictions and boycotts prohibit certain business activities with and in certain countries or with natural persons or legal entities which are a risk to security, human dignity and human rights. We comply strictly with national and European economic sanctions. We rule out categorically persons, companies or organisations which are

linked to atomic, chemical or biological weapons (of mass destruction), money laundering, terrorism, drug trafficking or other illegal activities as business partners.



 If you suspect that someone is trying to use us for illegal activities such as money laundering or financing of terrorism, inform the Compliance Department immediately.

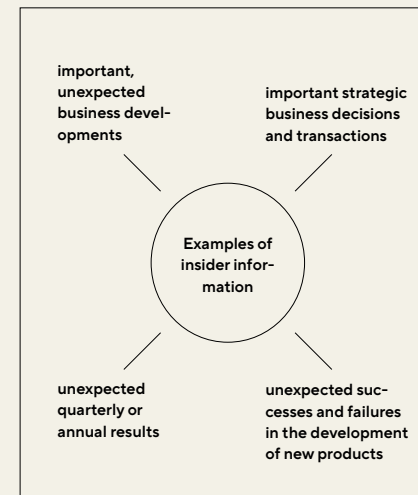
● Insider dealing


Even though we are not a listed company, we advocate fair and transparent securities trading. Because we too can receive, voluntarily or involuntarily, non-public information which, if it became known, could be used to significantly influence a share price.

Do you know, for example, about a confidential meeting between the owners of (listed) companies in our hotel? When you tidy up the event room, are flip charts with information about new products still next to the lectern? Have participants left

behind documents with information about the expected annual financial statements.

Regardless of how we obtain any information, the confidentiality interests of our business partners are always top priority and have to be protected. Even if we have “explosive” information, we must never use this insider information for the targeted purchase or sale of shares or financial instruments.



 **What is meant by insider dealing?**
Insider dealing is defined as the buying or selling of securities using a company’s internal which is not yet public. The insider is not allowed to exploit this information personally or to disclose it to third parties. In the case of an infringement the insider will face a prison sentence of up to five years or a fine.



we protect what needs to be protected – trustworthy handling of personal data, confidential information and company property

● Data protection

In the digitalised world, data can be collected, transferred, analysed, used and exploited quickly and easily. For this reason, it is highly important that we carefully protect the confidentiality of the personal data of colleagues, business partners, job applicants and guests. Trust means accepting responsibility for our actions and work, for the systems and data of our customers and colleagues. Personal and business data is placed in our hands, including information which is critical and worthy of protection.

It is therefore extremely important that we handle this data responsibly. We are careful to ensure that personal data is not disclosed internally or externally. Likewise, we do not retain personal data for potential future purposes. The only exception is if the retention of personal data is required or permitted by national law.

OUR DATA PROTECTION OFFICER

Peter Kattner
TÜV Informationstechnik GmbH

Tel.: (0201) 8999-643
Mobile: 0171-22 60 900
Email: p.kattner@tuvit.de



Detailed information is provided in our Data Protection Standards. The YoCu page "Data protection & security" keeps you informed at all times.



My superior has asked me to compile a list of the birthdays of our employees so that this can be hung up in the canteen. Are we actually allowed to do this and what do we need to be mindful of?

The publication of dates of birth for birthday lists is not allowed by law due to the significant and legitimate interests of colleagues. If you would still like to know when to congratulate your colleagues, the following practice is recommended: It is explained in the list that they can have their name removed from the list at any time. Although an option to opt out is no substitute for consent, if they do not exercise this option at least it can be assumed that the colleagues do not have any conflicting interests. You will achieve a higher level of acceptance here if you do not record the years of birth, which is also consistent with the principle of data economy.

An alternative would be a birthday list to which every employee can add their birthday themselves. By adding their birthday to the list, every employee automatically gives their consent that their name may be published in the hotel in connection with their birthday.

● Protection of company property, our business secrets and the confidentiality interests of our business partners and customers

It should be obvious to everyone that they need to handle company property responsibly. We treat business assets with care and do not use them for our own purposes or appropriate them unlawfully. Company property includes not only material objects, but also intellectual property. Our know-how and our innovations are key for the long-term success of our company. For this reason, it is also important that everyone treats our business secrets with care and consideration.

Likewise, we respect existing non-disclosure agreements and the confidentiality interests of our business partners, because they trust in our reliability and discretion. We make sure that the unauthorised publication, taking or use of confidential information does not take place.



The obligation not to disclose confidential information and business secrets will continue when you leave Lindner.



what we expect of our business customers

It is our goal to fashion our services now and in future responsibly and successfully together with our business partners. In our opinion, the basis for this is a common understanding of ethical and sustainable behaviour. For this reason, what we expect and demand from all business partners is that they are also committed to the principles of our Code of Conduct and act with a sense of duty and integrity.

All of our suppliers and service providers receive at the time of signing contracts the “Code of Conduct for Suppliers”, which is also an integral part of the contract. If both business partners (i.e. we and the supplier or we and the customer) have their own adequate Compliance Management System, alternatively the so-called “Recognition Agreement” can be signed. In the case of mutual recognition, neither party is subordinate to a third-party Code of Conduct.



handling violations

● What happens in the case of a violation of the Code of Conduct?

Every early detection of a vulnerability or a violation of the Code of Conduct and other guidelines can protect Lindner or individual employees against fines, contract penalties or even criminal prosecution.

If a violation of the Code of Conduct is proven, the principle of proportionality is always followed. The Compliance Department will therefore consider in each individual case what consequences are appropriate, necessary and reasonable.

Depending on the circumstances of a violation, Lindner can decide (to the extent permitted by law) by way of example the following measures: re-training, a downgrading in the performance appraisal or other action allowed under employment law, including disciplinary action right up to termination of the employment relationship.



I have witnessed behaviour which I consider to be a violation of the Code of Conduct. I am of the opinion that I should report this, but wonder what will happen to me in this case. Is it true that I might be punished for reporting such an incident?

No. Anyone who reports a compliance violation does not need to fear any negative consequences, even if the report is proven to be unfounded. No one who complies with the provisions of the Code of Conduct or reports potential violations or conflicts to management, the Compliance Department or a superior will be punished. Whistleblowers make an important contribution to the upholding of values in our company.



There is no wildcard!

If someone reports their own misconduct, this does not mean that the violation will be excused or that there will be no disciplinary action. But the fact that someone has the courage to report their own misconduct will be taken into account when the decision on appropriate action is made.



● How are violations investigated?

The Compliance Department takes all tip-offs and reports of violations seriously and immediately launches an investigation. Every case is resolved fully in a transparent and understandable manner. The Compliance Department has to ensure that the possible violation is handled confidentially and has a duty of secrecy here.

In certain cases the Compliance Department is required by law to inform the accused person(s) that they have received a tip-off as soon as this no longer poses a risk to the following-up of the tip-off. In this case, the identity of the whistleblower will not be revealed – if this is permitted by law – and it will be ensured that no

other information which allows conclusions to be drawn on the identity of the whistleblower is disclosed.

The Management Board and Supervisory Board have for their part a duty to support the Compliance Department fully in its investigations, in order to contribute to the compliance case being resolved as quickly as possible. The Compliance Department also has the duty to report on the compliance cases once a year to the Management Board and Supervisory Board, without disclosing confidential information.

● How can I report a violation?

If you suspect or know that any action or inaction is a violation of our Code of Conduct, we would like you to contact us.

We understand that the first step is always the most difficult. You need courage and strength to stand up for what is right. In particular if a colleague is suspected of misconduct, you perhaps face an internal conflict. Perhaps you think that you will damage the trust of your colleagues. However, if we ignore the situation, this will only get worse. Because someone who gets away with misconduct once, will probably do it again.

Please report if you are unsure, if you need a second opinion, if you feel you have been treated unfairly or if you have seen something which you think is in violation of the principles for our actions and behaviour.

A number of reporting channels are available to you – you can decide yourself which channel is the right one for you.

Reports can be made – if you wish anonymously –

- to your superior,
- to your personnel officer,
- to the Compliance Department
- or using our web-based whistleblower system “EQS”.

The whistleblower system is operated by an external service provider and meets the highest standards with regard to protecting the identity of the reporter and the security of the information provided. Provide us with a tip-off of a potential violation using the method which is the easiest for you: Our whistleblower system can be used on all devices (PC, mobile, tablet).

Simply scan the QR code or use the following link: <https://lindner.whistleblownetwork.net/frontpage>

Do not see a report as a threat, but rather as an opportunity for our company to identify wrongdoing at an early stage and to take the necessary corrective actions.



Further information is provided in our company guideline “Handling compliance incidents” on YoCu.



“Our, Lindner Values’ and our Code of Conduct provide a firm foundation for our actions. We seek to do what is right at all times.”

“Actually it is very simple: We treat others the same way we would like to be treated ourselves!”

“The good reputation and corporate culture of Lindner Hotels & Resorts were and are the key to our company’s success. Yesterday, today and tomorrow. We therefore want to behave in an ethically correct manner at all times and urge our fellow human beings to do the same. The Code of Conduct is our guide for this.”

“Our business decisions are guided by our values and our Code of Conduct. Always!”

Compliance Management is for me a guardrail in my daily work. Above all the thought “Will what I am doing today be in tomorrow’s newspaper?” helps me in many of my decisions.

The quotes were collected in the “Relaunch Code of Conduct – be a part of it” initiative in the employee portal YoCu and via e-mail. Because the feedback could be provided anonymously, it is neither possible nor our desire to attribute the quotes to individual persons.



lindnerhotels.com/compliance

LINDNER HOTEL GROUP

Emanuel-Leutze-Straße 20
D-40547 Düsseldorf

Tel +49 211 5997-310
Fax +49 211 5997-348
info@lindnerhotels.com
www.lindnerhotels.com

 [#lindnerhotels](https://www.instagram.com/lindnerhotels)

 BY HYATT™