



## CODE OF CONDUCT FOR SUPPLIERS OF THE Lindner Hotel Group

**Creating value for a world worth living for next generations, animals and nature.**

This is a key objective of our mission and is our shared responsibility.

The Lindner Hotel Group (“we”) is among the innovation and concept market leaders in the European hotel industry and stands for sustainability and social commitment. We see it as only natural that we respect human rights and protect the environment. We believe that business should be conducted honestly, fairly and with respect for other people, their dignity and their rights.

What we understand by compliance is the company, our employees<sup>1</sup> and our business partners behaving correctly – in legal, economic and ethical terms. We adhere strictly to high standards when it comes to compliance with laws and business ethics. Our [Code of Conduct](#) supports our shared corporate philosophy and defines the standards of conduct that guide the management of our company.

In order to support and uphold our values, it is important to ensure that the principles of sustainable development are adhered to throughout the supply chain. It is for this reason that we make this Code of Conduct available to our suppliers with the purpose of strengthening our shared understanding of how sustainability should be implemented in everyday business.

### **We expect from our suppliers that they**

- comply with all applicable laws and adhere to internationally recognised human rights, environmental, social and corporate governance standards.
- also implement these standards in the downstream supply chain.
- recognise, support and observe the following ESG standards<sup>2</sup> and principles.

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<sup>1</sup> For the sake of simplicity, only the male form is used. All terms used apply equally to all gender identities.

<sup>2</sup> These are based on the Ten Principles of the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.



**The supplier and/or business partner hereby agrees that it will:**

## **ENVIRONMENT**

- Use resources efficiently, employ energy-efficient and environmentally-friendly technologies and reduce its waste and emissions into the air, water and soil.
- Minimize its negative impact on biodiversity, climate change and water scarcity in order to protect the livelihood of people.
- Adhere to all applicable environmental and work safety regulations, as well as all international agreements concerning environmental standards.
- Promote the safe and environmentally-friendly development, manufacture, transportation, use and disposal of its products. This includes in particular, but not exclusively the banning of the manufacture, use or handling of mercury or products moved with mercury, the banning of the production, use, environmentally-unfriendly handling, collection, storage and disposal of persistent organic pollutants and the banning of the export and import of hazardous waste pursuant to the Basel Convention and Regulation (EC) No. 1013/2006.
- Protect the life and health of its employees, neighbours and the general public against the risks that can arise from its manufacturing processes and products.
- Ban unlawful evictions and unlawful seizure of land, forests or waterbodies.
- Ensure with suitable management systems that product quality and safety meet the applicable requirements.

## **SOCIAL**

- Ensure that its activities and the way it treats employees are in line with internationally proclaimed human rights and not employ either directly or indirectly forced labour (including but not limited to modern-day slavery and human trafficking) and child labour of any kind or use preliminary products that have been manufactured using labour of this kind.
- Support the right of freedom of association and the right of collective bargaining in accordance with the applicable regulations.
- Adhere to local laws concerning minimum wage, working hours and break times and provide compensation in the form of a living wage that is appropriate for local living conditions.
- Respect the personal dignity, privacy and personal rights of every individual.
- Treat its employees with respect, promote an integrative work environment, and prohibit the following: discrimination, unequal treatment, harassment, abuse or inhumane treatment of persons, for example due to ethnic or national origin, race, skin color, religion, ideology, gender, sexual orientation, gender identity and/or gender expression, age, physical or mental disability, political or union affiliation, nationality, motherhood, marital status or any other characteristic that is protected by law.



- Adhere to the applicable work safety regulations and ensure a safe and healthy work environment in order to maintain the health of employees, protect third parties and prevent accidents, injuries and work-related illnesses.
- Ensure that all company security personnel adhere to the applicable laws.
- Do not supply products containing conflict minerals that directly or indirectly finance or support armed groups and cause human rights violations.

## GOVERNANCE

- Adhere to the applicable national and international legislation (in particular but not exclusively trade control and sanctions legislation).
- Act in accordance with the national and international competition laws and not be party to price agreements, the dividing up of markets or customers, market-sharing agreements or bid-rigging.
- Not tolerate bribery, corruption and money laundering of any kind.
- Ban the giving of gifts to private persons or public officials that are intended to influence their business decisions or encourage them in any other way to violate their duties and obligations.
- Prevent all conflicts of interest that may have a negative impact on business relations.
- Adhere to the applicable data protection and security laws and regulations.
- Respect the privacy and confidential information of all employees and business partners and to use this information exclusively in an appropriate manner.
- Protect data and intellectual property against misuse.

## MANAGEMENT

- Implement training measures in order to provide its managers and employees with a reasonable level of knowledge and understanding of the content of this Code of Conduct for Suppliers, the applicable laws and regulations as well as recognised standards.
- Set up communication channels for its employees which they can use to express concerns, make complaints or report potentially unlawful activities.
- Implement processes to identify, determine and monitor risks in all areas which are addressed in this Code of Conduct of Suppliers and all applicable legal provisions.
- Prepare adequate documentation to prove that the principles and values of this Code of Conduct for Suppliers are shared.
- Improve continually by setting performance targets, by executing implementation plans and by taking necessary corrective and preventive measures.



## Compliance with and acknowledgement of the Code of Conduct for Suppliers

The Lindner Hotel Group reserves the right to examine after reasonable advance notice whether the requirements of the Code of Conduct for Suppliers are being complied with by for example audits or assessments. The supplier has to obtain and supply upon request information and documents that are required for the Lindner Hotel Group to meet all of the regulatory requirements arising from the contractual relationship. Regulatory requirements in this sense arise in particular, but not exclusively from the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

Any breach of the obligations stated in the Code of Conduct for Suppliers will be considered to be a breach of a material contractual obligation by the supplier. In such a case we will inform the supplier what problems need to be remedied and or what improvements need to be made. The supplier will then have to take corrective action without delay and provide appropriate evidence that the respective problems have been remedied and/or improvements have been made. If there is still cause for concern, we will take suitable measures with regard to the business relationship. If the breach is a serious, ongoing or repeated breach (and if no measures have been taken by the supplier to remedy such shortcomings), we also reserve the right to sever all relations.

The supplier has to indemnify us against all claims by third parties arising from a breach of such regulations. Furthermore, the supplier has to pay compensation for breaches of the Code of Conduct for Suppliers, unless it proves that it was not responsible for the breach. The compensation will also include a reasonable amount for damage to reputation.

Other contractual obligations remain unaffected by this Code of Conduct for Suppliers and have priority over the provisions described in this document.

Suppliers must acknowledge the principles in this Code of Conduct for Suppliers or provide evidence through its own code of conduct that the legal positions stated therein and to be complied with are equivalent to the legal positions of this Code of Conduct for Suppliers. The supplier will also place its own suppliers under obligation to comply with the Code of Conduct for Suppliers.

If this Code of Conduct for Suppliers is revised, the revised version will apply automatically. The most current version and further information can be viewed at <https://lindnerhotels.com/en/compliance>.

## Whistleblower system

Information about unlawful behaviour or misconduct resulting from business activities in their own work environment or in the work environment of another supplier can be reported via the Lindner whistleblower system (link: <https://lindner.whistleblowernetwork.net/frontpage>), without fear of repression, intimidation or bullying. All reports will be treated confidentially and can be made anonymously, to the extent permitted by law.

The supplier will provide its employees with unhindered access to the complaints procedure set up by the Lindner Hotel Group.



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In particular, it will not take any actions that hinder or block access to the complaints procedure. The supplier agrees that it will place its own suppliers under contractual obligation to meet the obligations stated in sentences 1 and 2 and ensure that the obligations are passed on in the supply chain.



## Acknowledgement of the Code of Conduct for Suppliers of the Lindner Hotel Group

Name of supplier: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Contact: \_\_\_\_\_

The supplier has its own compliance management system that at least ensures compliance with the principles of this Code of Conduct. The supplier and the Lindner Hotel Group recognise that their codes are of equal value and neither party will be placed under contractual obligation to comply with the code of conduct of the other party.

yes       no

*If yes:*

*Please return the relevant documents together with this signed acknowledgement.*

*If no:*

The supplier acknowledges the Code of Conduct for Suppliers of the Lindner Hotel Group:

yes

Place, date

Name, signature

*Please sign this acknowledgement and return it to your contact within 10 days of receipt.*