



Rules of Procedure LkSG Complaints Procedure (§ 8 para. 2 LkSG)

For Maritim Hotelgesellschaft mbH, respect for human rights and the sustainable protection of the environment are central cornerstones of our own actions and those of our suppliers and all other participants in the supply chain.

Maritim Hotelgesellschaft mbH has therefore introduced procedures to deal with complaints and indications of possible risks or violations relating to human rights and environmental protection and to take effective follow-up measures.

What is the subject of the procedure:

The subject of the procedure can be all complaints and information that indicate possible human rights or environmental risks and violations.

Possible human rights risks and violations that may be the subject of the complaint may relate in particular to the following aspects of the LkSG (The Act on Corporate Due Diligence Obligations in Supply Chains):

- Child labour
- Forced labour and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association, freedom of association and the right to collective bargaining
- Unequal treatment in the workplace
- Withholding of appropriate remuneration
- Destruction of natural resources through environmental pollution
- Illegal violation of land rights
- Commissioning or use of private/public security forces, which can lead to damage due to lack of training or control
- Acts or omissions in breach of duty that are directly capable of seriously impairing a protected legal position (= other human rights) and whose unlawfulness is obvious when all the circumstances in question are reasonably assessed.

Potential, reportable environmental risks and violations can take the following forms in particular:

- Violation of a ban under the Minamata Convention for the Protection of Human Health and the Environment from Anthropogenic Emissions and Immissions of Mercury and Mercury Compounds into Air, Water and Soil
- Violation of the ban on the production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs
- Violation of the ban on the import and export of hazardous waste within the meaning of the Basel Convention



Who can submit a report:

Anyone is entitled to report information or complaints regarding potential human rights or environmental risks and violations.

Complaints office and options for submitting information:

Information or complaints relating to human rights and environmental risks or breaches of duty can be submitted via the web-based complaints channel provided for this purpose. The link to the web-based reporting centre can be used for this purpose.

Complaints office under the LkSG (<https://lksg.pkf-wms.de/HinweisGeben/5905>)

Procedure of the process

As soon as you submit a report to the LkSG via our online complaints office, this report will be forwarded immediately to the ombudsmen we have appointed at PKF WMS Dr. Buschkühle PartG mbB, Martinsburg 15, 49078 Osnabrück. Several independent ombudsmen are appointed there who will receive your report, confirm receipt and inform you of the follow-up measures taken. As part of their work, the ombudsmen will also contact the Human Rights Officer, Mr Henning Jünke, who is impartial, independent and sworn to secrecy. They will then check whether the complaint or tip-off relates to possible human rights violations or environmental risks. In the event of complaints involving human rights and environmental risks or breaches of duty, remedial measures are developed and existing preventive measures are adapted. The facts of the case are discussed with the whistleblower (where possible and necessary) in order to gain a better understanding of the facts of the case and the measures to be taken.

In particular, the expectations of the whistleblower with regard to possible corrective and preventive measures. Once the matter has been conclusively processed, the result must be communicated to the whistleblower (provided the whistleblower has disclosed his or her identity).

The receipt is also documented. The whistleblower receives a corresponding confirmation of receipt after seven calendar days at the latest. The whistleblower must be given feedback after three months at the latest. If the processing takes longer than three months, the whistleblower must be informed accordingly.

Duration of proceedings

The duration of a procedure (submission of a report) varies depending on the complexity of the respective report. As a rule, follow-up measures are taken within three months.

Procedural principles

Impartiality, independence from instructions and confidentiality are ensured through the processing of complaints and information by the appointed human rights officer and our ombudsmen in terms of personnel and procedures.

**Anonymity and protection against discrimination**

In the case of complaints or reports, anonymity is guaranteed in all cases if the whistleblower so wishes. As a lawyer, the ombudsman is obliged to maintain confidentiality. Upon request, the ombudsman will keep the identity of the whistleblower secret. It is also possible to make a report without giving a name. Please note that in these cases we will not send you an incoming e-mail and will not be able to contact you. The whistleblower is also assured that they will not suffer any disadvantages in any form.

Costs of the procedure

The reporting of information is free of charge for the person providing the information.

Review of the effectiveness of the procedure

The appropriateness and effectiveness of the complaints procedure is reviewed annually as well as on an ad hoc basis.