

## 1. PROCEDURAL RULES FOR COMPLAINTS

### 1.1 Introduction

As a matter of course, the Motel One Group always observes all the laws and guidelines that apply to it. The Motel One Group expects its business partners to do the same.

Protecting human rights and the environment along the supply chain is a particularly high priority. The Motel One Group has therefore implemented appropriate due diligence processes. The [human rights strategy policy statement](#) provides details of how the Motel One Group meets its due diligence obligations in accordance with the German Supply Chain Act ('LkSG').

An essential part of this strategy is a complaints procedure that is intended to facilitate open communication with any parties potentially affected by the economic activity of the Motel One Group and its supply chain. We welcome questions, concerns and information that enable us to avert violations of human rights and environmental obligations in a timely manner and avoid risks.

The procedure acts as an early warning system. It is intended to prevent actual violations by providing early warnings. The procedure as a whole also enables remedial action to be taken as effectively as possible. Finally, it provides the Motel One Group with valuable information for the development of risk management and risk analysis, as well as for monitoring the effectiveness of preventive and remedial actions.

The following explanatory notes aim to provide clear, concise information about the Motel One Group complaints procedure.

### 1.2 Who can submit a complaint?

Anyone can submit a complaint. In particular, you don't have to be affected yourself to report an incident. Complaints can also be submitted anonymously.

For example, employees of the Motel One Group, employees of direct and indirect suppliers, people affected by our economic activity and works councils or NGOs can report an incident on behalf of others.

The person or organisation submitting a complaint is hereinafter referred to as the '**Whistleblower**'.

### 1.3 No negative consequences as a result of a complaint

Whistleblowers who submit or are involved in complaints in good faith and in the belief that the facts disclosed are true should not suffer any disadvantage as a result of the complaint. This protection does not apply if the Whistleblower uses the complaints procedure for improper, reckless or unlawful purposes (i.e. maliciously submitting a tip-off).

Retaliation by employees of the Motel One Group, by direct or indirect suppliers or by other third parties will therefore not be tolerated. The Motel One Group takes appropriate measures to avoid this and to influence the supply chain. If the Motel One Group becomes aware of retaliation, this may result in disciplinary action, up to and including dismissal and evaluation and, in extreme cases, the termination of business relationships.

#### 1.4 What can I report?

You can use the complaints procedure to notify us of and/or report (possible) risks and (possible) breaches of duty with regard to human rights or the environment under the LkSG. This includes concerns, doubts and suspicions. Complaints may affect both our own business area and the economic activity of direct or indirect suppliers of the Motel One Group.

The Motel One Group encourages you to raise any comments, concerns and complaints as early as possible. If a breach of duty has not yet occurred, this may be avoided thanks to your complaint.

Human rights and environmental risks and breaches under the LkSG can particularly affect the following obligations:

- Prohibition of child labour and the impairment of children's health, safety and morality
- Prohibition of forced labour and all forms of slavery
- Occupational safety: health and safety at work
- Freedom of association, the right to form and join trade unions without any negative consequences, the right to strike and collective bargaining
- Prohibition of discrimination and unequal treatment in employment
- Appropriate wages
- Prohibition of water and air pollution, harmful soil changes or causing harmful noise, as well as excessive water consumption, if this impairs a person's food supply, health or access to sanitation
- Prohibition of the unlawful withdrawal of land, forests and lakes as a person's livelihood
- Prohibition of a lack of training or control when deploying security forces, thereby adversely affecting certain human rights
- Prohibition of the use of mercury and mercury compounds in production and the orderly and correct disposal of waste in accordance with the Minamata Convention
- Prohibition of the production and use of persistent organic pollutants, as well as the environmentally compatible handling of waste, in accordance with the Stockholm Convention
- Prohibition of the import and export of hazardous waste in accordance with the Basel Convention

The following (possible) violations may also be reported:

- Conflicts of interest
- Harassment

- Discrimination
- Violations that are subject to punishment
- Violations that are subject to fines to protect life, limb and health or to protect the rights of employees or their representative bodies
- Certain violations against national and regional legislation and directly applicable acts adopted by the European Union (see § 2 para. 1 no. 3 of the German Whistleblower Protection Act, HinSchG)
- Retaliation

The Motel One Group is also happy to receive suggestions for improving access to this complaints procedure.

### 1.5 **How do I submit a complaint?**

Motel One provides a digital reporting channel (reporting platform). This reporting channel can be accessed in various languages at any time [here](#).

Complaints can also be submitted anonymously. It is possible to communicate with the Whistleblower via the online tool provided even if the tip-off is anonymous.

In addition, complaints can also be submitted at any time in person, by e-mail or by post to the following offices

Motel One Group  
Group Compliance Officer  
Tegernseer Landstr. 165  
81539 München

[compliance@motel-one.com](mailto:compliance@motel-one.com)

Complaints will be treated confidentially in accordance with the applicable legislation and regulations.

The complaints procedure is free of charge for Whistleblowers.

### 1.6 **Who handles complaints?**

Complaints are handled by the Compliance Department. The Compliance Department is:

- Impartial
- Independent and/or not bound by any instructions
- Obligated to maintain confidentiality, especially with regard to your identity as the Whistleblower
- Specially trained
- Equipped with the necessary resources, in particular the time to handle complaints appropriately

If necessary, the relevant departments are involved in handling the complaint. Other people may also be involved if this is required to fulfil our due diligence obligations.

## 1.7 **Confidentiality, data protection, documentation and reporting requirements**

All those involved in handling complaints are bound by strict confidentiality rules. Only the information from the complaints procedure that is required to handle the complaint effectively or comply with the statutory obligations of the Motel One Group will be shared with individuals. In particular, we ensure that the confidentiality of your identity as the Whistleblower is protected and that protection from being disadvantaged is maintained.

The Motel One Group complies with the applicable legislation and regulations regarding the collection, processing and storage of personal data. In accordance with the relevant legislation and regulations, the Motel One Group undertakes to document its complaints procedure and every complaint. According to § 10 para. 1 of the LkSG, for example, documentation must be retained for at least seven years. According to § 10 para. 2 of the LkSG, a public report is produced, which also includes the complaints procedure.

## 1.8 **How does the complaints procedure work?**

### (a) **Complaints and acknowledgement of receipt**

After a complaint has been submitted, it is immediately forwarded to the Compliance Department. You will receive acknowledgement of receipt. In addition, we will notify you of the next steps, the timing of the procedure and your rights regarding protection from being disadvantaged or punished.

### (b) **Plausibility check**

After the complaint has been received, the Compliance Department will carefully check whether it is plausible. As the Whistleblower, you will be contacted to enable us to better understand the situation.

If your complaint is not plausible, you will be promptly notified and given a brief explanation. The complaints procedure is then deemed to have been completed.

Where required, we will take immediate action to minimise or stop (imminent) breaches and violations.

### (c) **Clarifying the situation**

Plausible complaints are thoroughly investigated by the Compliance Department, taking account of the applicable statutory regulations. Where required for appropriate handling, relevant departments or external experts may be involved while respecting the principle of confidentiality. The Compliance Department will appropriately involve the Whistleblower in clarifying the situation. If no preventive or remedial actions are required after the situation has been clarified, the complaints procedure will be closed.

### (d) **Preventive and remedial actions**

If the complaints procedure results in appropriate preventive or remedial actions, the Motel One Group will plan and implement these or address their implementation with the person responsible for the violation and support them with this. As the Whistleblower, you will be appropriately involved in developing a solution throughout the complaints procedure.

**(e) Completion of the complaints procedure and evaluation**

The Compliance Department will notify you of the outcome of the complaints procedure. The Whistleblower can evaluate the complaints procedure.

The complaints procedure is closed, provided the reported risk has been adequately minimised or the reported breach has been adequately prevented or stopped or its magnitude has been minimised. It can also be classified as completed provided a specific cessation and minimisation schedule has been agreed with the person responsible for the violation and its implementation has begun. Finally, it is deemed to have been completed when the business relationship has been terminated by the Motel One Group, thereby leaving no more scope for intervention.

**(f) Option of additional contact, particularly with regard to retaliation**

Please contact us at any time, even after the complaints procedure has been completed, if you fear retaliation.

**1.9 How long does the complaints process take?**

The Motel One Group aims to handle complaints as quickly as possible. Reported risks should quickly be minimised and violations and/or breaches quickly prevented, stopped or minimised. However, the duration of the procedure depends on the circumstances of the individual case. The more complex the risk or violation is, the more time and effort it takes to check the complaint, clarify the situation and develop a solution.

**1.10 How do I find out the current status?**

The Compliance Department ensures that you as the Whistleblower are adequately informed of the current status of the procedure. You will first be notified no later than three months after you submitted the complaint.

**1.11 Reviewing efficiency/effectiveness**

The Motel One Group reviews the efficiency and/or effectiveness of its complaints procedure annually and on an ad-hoc basis. Such ad-hoc reviews are undertaken if significantly altered or significantly increased risk exposure is identified in the supply chain.

If necessary, appropriate measures will be taken to extend and improve the complaints procedure.

**1.12 Effective date of these procedural rules**

These procedural rules were adopted by the Motel One Group Compliance Officer on 20/12/2023 and come into force on 1 January 2024.