



Complaints Procedure for the Supply Chain Due Diligence Act

I. Introduction

AccorInvest Germany GmbH (AIG) is obliged to comply with certain due diligence obligations with regard to human rights and environmental risks in the supply chain under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG). A key component of AIG's strategy for minimizing such risks and avoiding violations of human rights or environmental obligations is the complaints procedure.

This document describes the procedure in detail. It contains information on who can provide information, how this is possible and how the complaints procedure works.

II. Target group

The complaints procedure is open to our employees and all other persons. Employees of direct and indirect suppliers can contact us as well.

It is important to us that persons making a complaint are protected from discrimination or punishment based on their complaints or reports. If a person making a complaint has the impression that they are suffering intimidation or reprisals as a result of their report, they can also use the complaints procedure described here, in which the misconduct will then be investigated and, if necessary, sanctioned.

III. Subject matter of the procedure

Within the scope of this complaints procedure, only information relating to human rights and environmental risks and violations of human rights or environmental obligations can be submitted. If the concern or complaint does not relate to rights protected under the LkSG, it will not be processed. The person making the complaint will be informed of this with a brief explanation. The subject of a complaint could be a situation in which, for example, a violation of one of the following prohibitions is imminent or has already occurred:



- Prohibition of child labor
- Prohibition of slavery and forced labor
- Prohibition of discrimination
- Prohibition of the right to form trade unions
- Prohibition of environmental damage that results in human rights violations (e.g. poisoned water)
- Prohibition of improper handling of certain substances that are hazardous to humans and the environment

We have compiled more detailed information in our Group-wide guidelines. The ESG Policy, the Ethics Charter and the Social Charter are available on our [website](#).

To enable proper processing, complaints should be worded as specifically as possible.

It is helpful if the complaint gives an answer to the following questions:

- **Who** is involved? Persons, suppliers, etc.
- **What** has happened?
- **Where** did the violation occur?
- **When** did the violation occur?
- **How** did the violation occur?

IV. Complaints channels

There are 3 channels through which risks and possible breaches of duty relating to the LkSG can be brought to our attention.

1. External persons and employees

a. External persons can contact us by e-mail at the following address:

menschenrechte@accorinvest.com

In order to protect the identity of the person making the report, the report can be made without providing a name and using an e-mail address that does not allow any conclusions to be drawn about the person.



b. Reporting via postal services is also possible. In this case, information should be sent to:

AccorInvest Germany GmbH
Compliance Department
Streitfeldstr. 25 b
81673 Munich
Germany

2. Employees

AIG employees can communicate via our Integrity Line. This tool can be used to report grievances within the company. If desired, this can be done anonymously. The topics that can be reported in this way include human rights and environmental issues.

Regardless of the communication channel, we treat all information confidentially. However, we are required to comply with legal obligations to provide information to authorities and legal exceptions to the confidentiality requirement. The confidentiality of the identity of the person making a complaint and other persons involved is maintained throughout the entire procedure.

V. Complaints procedure

Regardless of the communication channel chosen, all reports are forwarded to our internal compliance department, which acts as Complaints Office. The responsible employees are impartial, independent in the performance of their duties and sworn to secrecy.

We confirm receipt of a complaint within one week, provided we have the contact details of the person making the complaint.

We then check whether the report affects the rights protected under the LkSG. If this is the case, the Complaints Office will investigate the matter further, review documents and request information from the internal department concerned or the relevant supplier while safeguarding the rights of the person making a complaint.

As a rule and if possible in the case of anonymous complaints, the Complaints Office discusses the facts of the case with the reporting person and requests further information if necessary.

If, after reviewing the matter, we determine that there is a risk of a violation of human rights or environmental prohibitions or that a violation has already occurred or is imminent in the business area of AIG or its suppliers, appropriate preventive and remedial measures are developed to prevent or end the risk or violation or to minimize the



extent of the violation. Where possible and appropriate, the person making a complaint is involved in this process.

If it is possible to make contact, the whistleblower will receive notification of the conclusion of the complaints procedure with or without a risk or violation being identified. The aim is to conclude the complaints procedure within 3 months of receipt of the complaint, but this cannot always be guaranteed in complex cases.

VI. Concluding remarks

We do not charge any costs for conducting the procedure.

Data protection is guaranteed throughout the entire process. Our data protection guidelines apply, which are available on the following website: <https://www.accorinvest.com/data>

We review the effectiveness of our complaints procedure once a year and on an ad hoc basis. We therefore reserve the right to adapt these rules of procedure over time.

AccorInvest Germany GmbH takes its obligations under the LkSG very seriously. We set the highest standards for ourselves and our suppliers and continuously strive to improve. We are therefore grateful for any information about possible shortcomings.