# CODE





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# OUR VALUES OUR PHILOSOPHY

### Dear Employees,

We are proud that in recent years, together with you, we have established Motel One as one of the leading hotel groups in Europe. We have created a strong brand with our excellent locations, high standards of design and quality, and convincing pricing. Our second lifestyle brand — The Cloud One Hotels — has been building on the success of Motel One since 2022.

Our successful work together is based on respect, appreciation, openness and trust — values we practice, which over the years have shaped us as a matter of course. Furthermore, the Motel One Group also has a responsibility towards its guests, business partners, the public and the environment, and we must all live up to this responsibility.

Our CODE OF CONDUCT is intended to help us make the right decisions and carry out our daily work in accordance with our fundamental values and in compliance with applicable laws and internal regulations. This is an important prerequisite for our continued long-term success.

We, therefore, commit ourselves together to stand up for our values and implement them in our daily work. Please familiarise yourself with the content and contact us at any time with any questions or concerns.

We are passionate 'hosts' and want to change the hotel world for the better with our actions. That is our mission and our conviction.

Thank you sincerely for your commitment.

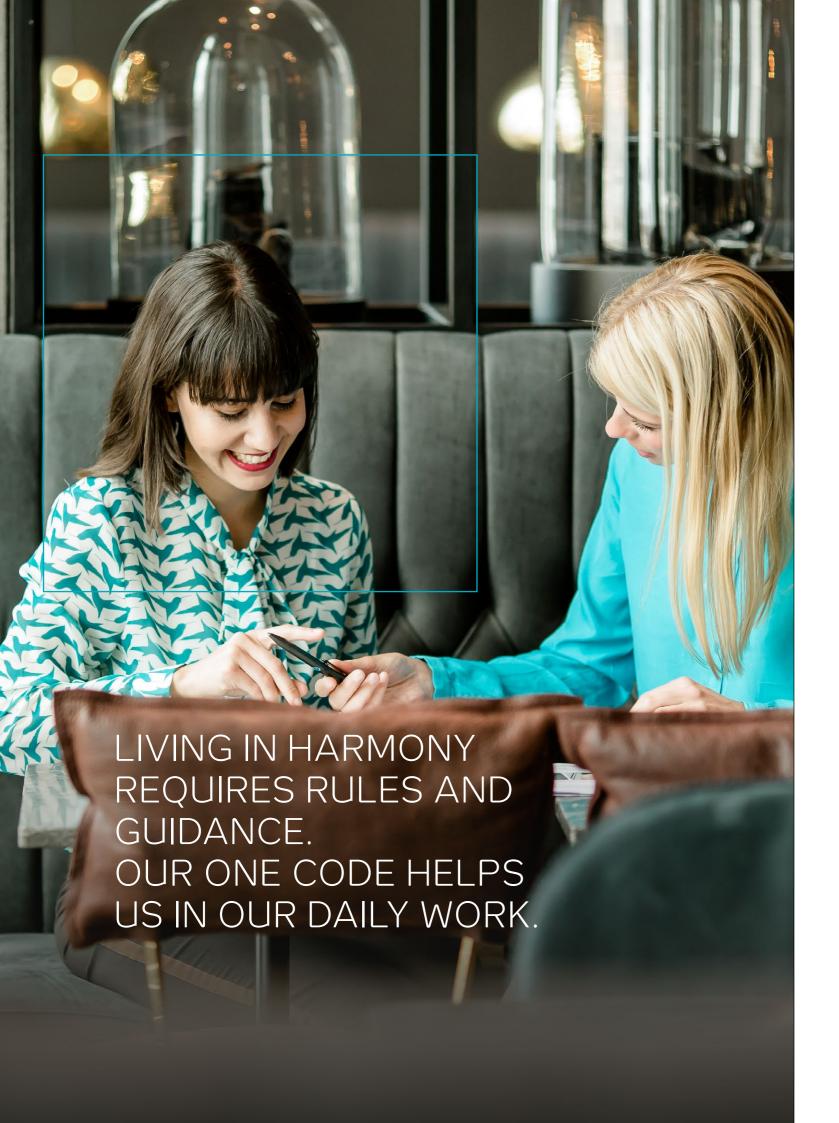
Kind regards,

Stefan Lenze & Daniel Müller Co-CEOs, Motel One Group











# THE ONE CODE

Our Motel One Code of Conduct defines our values, principles and guidelines that serve as the basis for every decision we make in our day-to-day work.

This code applies without exception to the entire One Family; that is, all the employees and, of course, also the management, board members and supervisory board members of the Motel One Group in all countries.

We must all know the rules that apply to us and abide by them. All employees are therefore obligated to familiarise themselves with the content of the One Code and to act according to these principles.

Our common goal is to do the right thing, to be honest and to act with integrity – towards our colleagues, guests and business partners.

The One Code is supplemented by further guidelines on individual topics. You can find all the compliance guidelines on myOne:

www.myone.motel-one.com





# COMPLIANCE WITH LAWS AND REGULATIONS

The Motel One Group and all its employees comply with the applicable laws, official requirements and internal regulations. We all are therefore obliged to know the applicable laws and regulations relevant to our duties



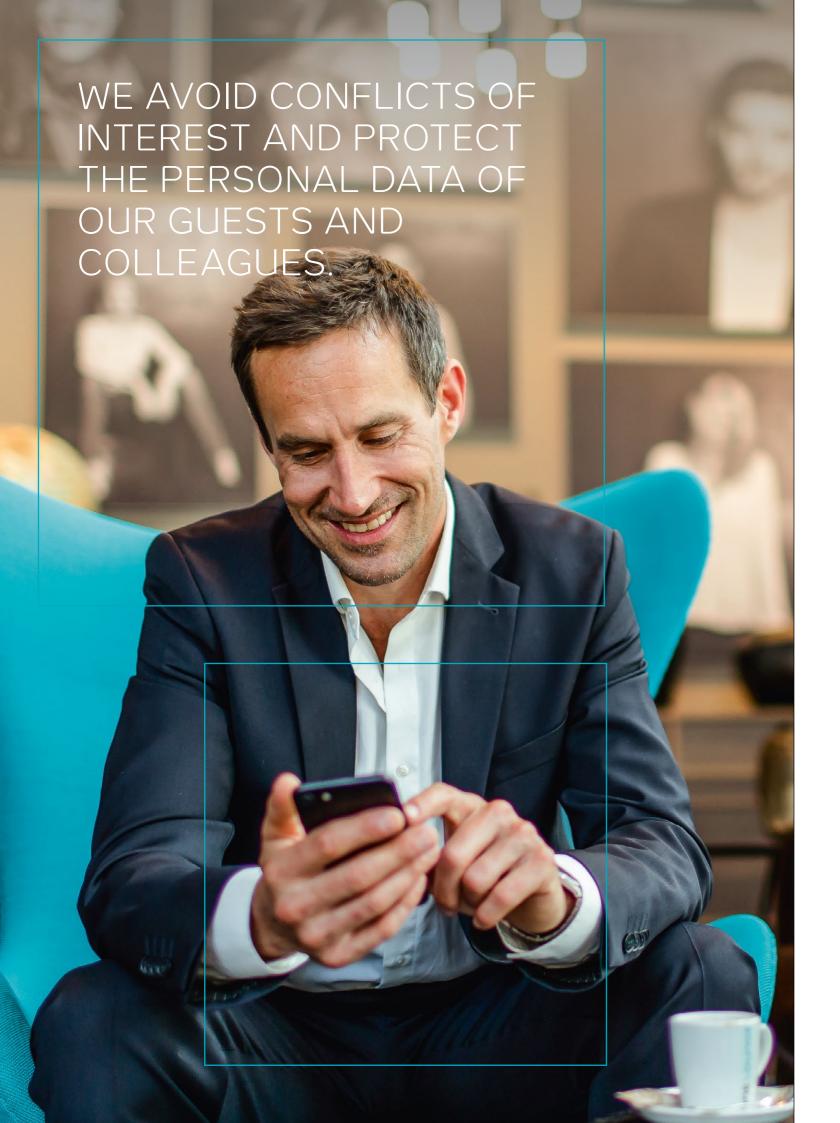
### PROTECTION OF HUMAN RIGHTS

The Motel One Group supports and respects internationally recognised human rights, in particular those defined in the Universal Declaration of Human Rights and in the European Convention for the Protection of Human Rights and Fundamental Freedoms. The Motel One Group is guided by the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and other internationally recognised frameworks such as the ILO core labour standards. We will not tolerate any violations of these rights and will intervene in the event of possible incidents in accordance with applicable laws. For this purpose, the Motel One Group has implemented appropriate, effective and robust processes.

We oppose any form of child or forced labour in any company or subsidiary of the Motel One Group.

If employees observe or have reason to suspect a violation of human rights, they are obliged to report the situation to the Group Compliance Officer immediately.

The same applies to any form of sexual harassment or sexual exploitation. These will not be tolerated in any way. The Motel One Group encourages all its employees to report any attempt at sexual harassment or exploitation to the Group Compliance Officer immediately.





# HANDLING CONFLICTS OF INTEREST

Business decisions must always be made on the basis of objective criteria in the best interests of the Motel One Group. Personal interests and relationships must not play a role in this process.

A conflict of interest arises when the personal interests of employees clash with their duties, such as due to personal relationships with business partners.

All our employees should avoid conflicts of interest and act with honesty, integrity and transparency. We all make our decisions on the basis of objective criteria and do not take advantage of our positions or contacts at the Motel One Group.

If employees find themselves in a potential conflict of interest, transparency is crucial and the situation should be discussed immediately with the relevant manager and/or the Group Compliance Officer.



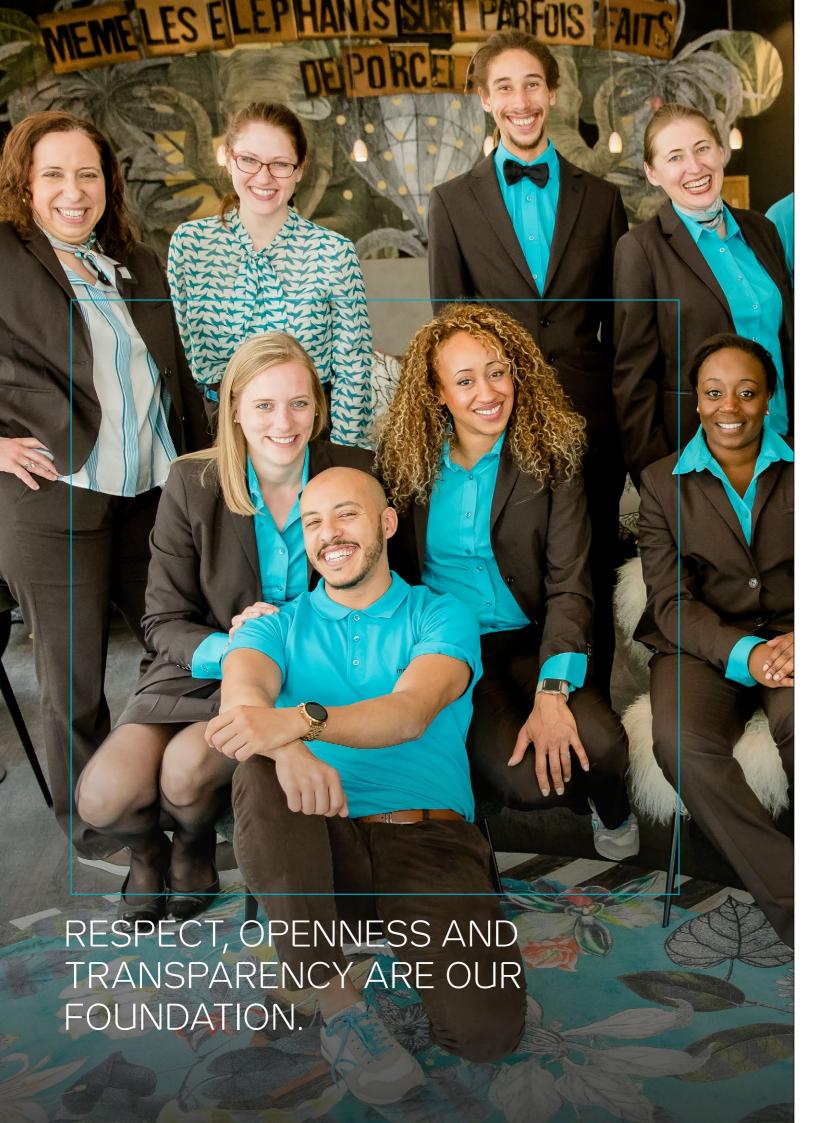
### PROTECTION OF PERSONAL DATA

Our guests provide us with personal data and information that we need for their smooth check-in and stay in our hotels. They rightfully expect us to handle this data responsibly.

The Motel One Group places great value on data protection and security and handles personal data with the greatest care and confidentiality.

The collection, storage, use and any other processing of personal data may only be carried out in accordance with the applicable data protection law, in particular the EU General Data Protection Regulation. We inform guests, employees, business partners and any others affected of the processing of their personal data so that they can exercise their rights in this context.

In addition, all the personal data we collect is protected from unauthorised access.





# WORKING TOGETHER RESPECTFULLY

We all want to work and live with others in an open and respectful way.

The Motel One Group does not tolerate any form of direct or indirect discrimination or harassment such as that based on national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology. This includes, in particular, the payment of equal compensation for work of equal value. We create an environment of diversity and inclusion.

We apply the principles of equal treatment and opportunity when hiring and dealing with employees as well as in our dealings with guests and business partners.

The Motel One Group is committed to the health and safety of its employees, guests and business partners. In doing so, we comply in particular with the applicable health and safety laws and regulations. All employees are required to familiarise themselves with the applicable health and safety laws and guidelines.

Any signs of a risk to health and safety must be reported immediately to the relevant manager and/or Human Relations.



# NO BRIBERY OR CORRUPTION

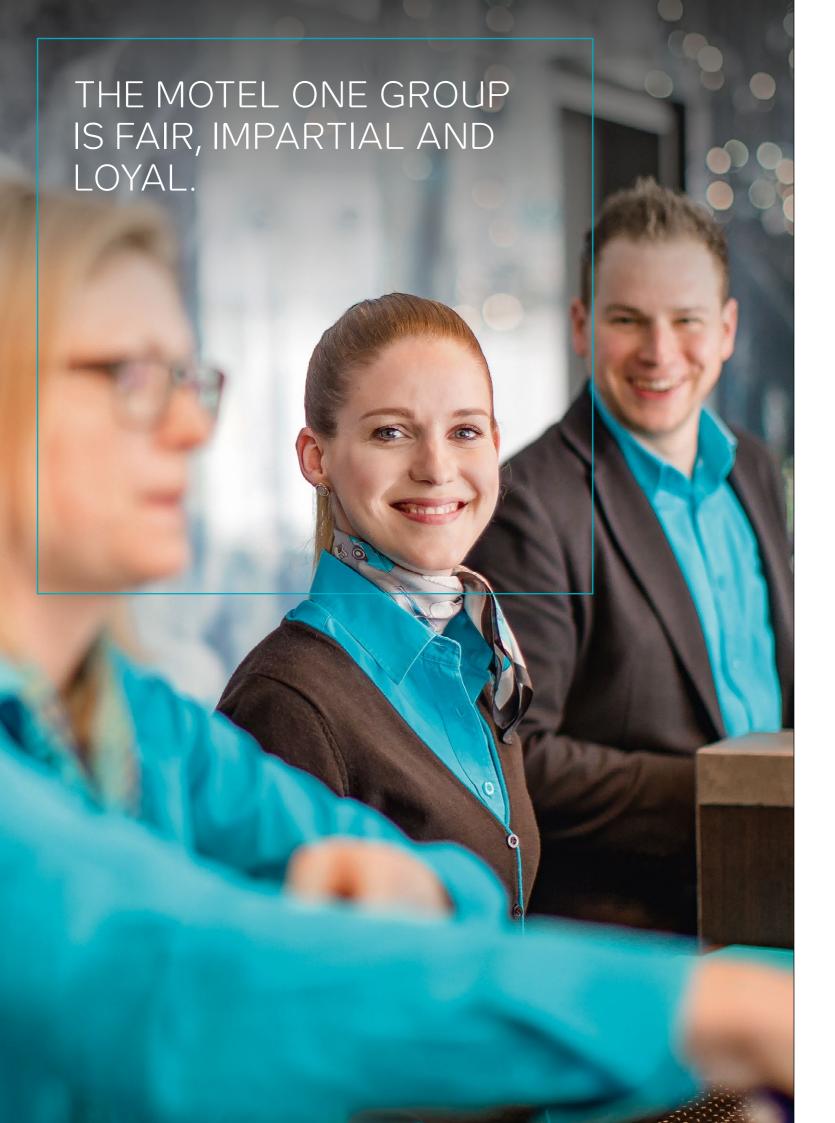
All employees are prohibited from directly or indirectly offering, promising, giving or requesting payments or favours in order to conclude a business transaction or gain an advantage.

We avoid any actions that might create the impression that we are inappropriately influencing anyone, or are being influenced by anyone else, and, of course, others may not be instructed to do this on behalf of the Motel One Group.

These rules apply in particular when dealing with public officials. 'Bribes' and other forms of corruption are strictly prohibited, and 'facilitation' or 'expediting' payments are not tolerated.

Moreover, all purchasing decisions must be made on the basis of clear and objective criteria, such as quality and price.

Even gifts or invitations from or to business partners may be viewed as bribery. Please familiarise yourself with the policy on gifts and gratuities, and always check whether gifts or invitations are appropriate. If you have any questions, please talk to your manager or the Group Compliance Officer.





### **LOBBYING**

As a company, we are above party politics. We are committed to our values, the applicable laws and democratic principles.

Work with industry associations and lobby groups is legitimate within the framework of the law, but must be coordinated in advance with the Group Compliance Officer.



## FAIR COMPETITION

The Motel One Group supports and respects the principle of free, fair and open competition, and conducts its activities in accordance with all applicable competition laws and regulations.

Anti-competitive contacts are strictly prohibited. Our employees may not enter into negotiations, conclude contracts or make agreements with competitors, for instance on:

- Prices, including the strategy and composition of prices or other business or contractual conditions
- Restrictions in trade or the exclusion of other market participants
- Sales volumes, market shares, sales or supply territories, sales conditions and coordinated refusals to purchase from specific suppliers or accept specific customers
- Employee salaries, components of remuneration or contract conditions

Informal agreements are also prohibited. No business-sensitive or strategic information may be exchanged with competitors.

Anti-competitive conduct can not only result in damage to the Motel One Group's reputation, it can also lead to high fines and penalties for the Motel One Group and/or the employee.

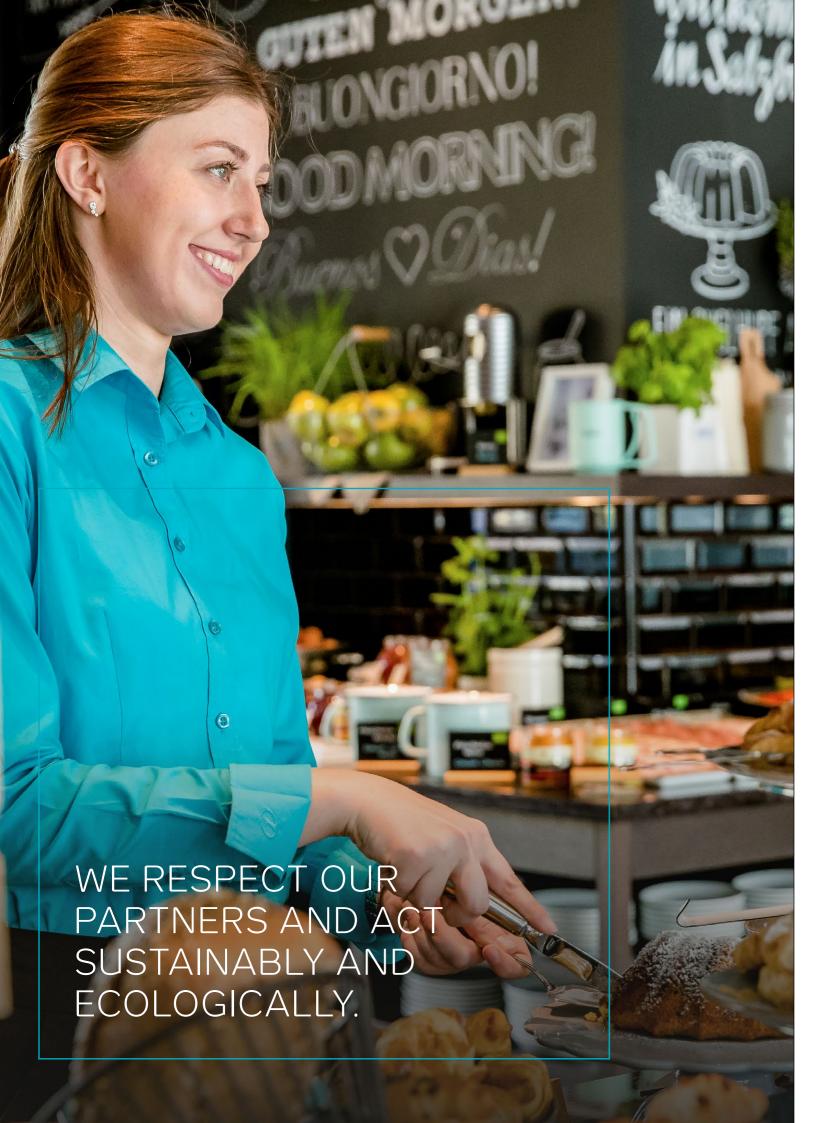
If you observe signs of anti-competitive conduct, report it without delay to the Group Compliance Officer.



### PREVENTING MONEY LAUNDERING

The Motel One Group does not accept payments from illegal sources or business activities.

All employees must report payments and cash receipts that appear unusual or are made with bearer cheques or in currencies other than those agreed. If there are signs of irregular payments, please inform the Group Compliance Officer.





# DEALING FAIRLY WITH BUSINESS PARTNERS

The Motel One Group may be held liable for the actions of its business partners under applicable laws and regulations. All employees must therefore exercise particular care when selecting business partners.

The Motel One Group also expects its business partners to comply with the applicable laws and regulations and the spirit of the One Code.



# RESPECT FOR THE ENVIRONMENT & SUSTAINABILITY

The Motel One Group is committed to respecting and protecting the environment and is aware of its social and societal responsibility. Our sustainability programme — 'One Planet. One Future' — is based on the United Nations' 17 Sustainable Development Goals, which incorporate economic, ecological and social aspects for a better future.

We are committed to reducing our environmental footprint and to developing and implementing strategies and solutions to consistently improve our sustainability goals. For the Motel One Group, this also includes efforts to not cause harmful soil changes, water pollution, air pollution, harmful noise emissions and excessive water consumption.

All employees are committed to using resources carefully and responsibly, i.e. to minimise water and energy consumption, to reduce waste and emissions and to support recycling. This includes the proper management of mercury (Minamata Convention), persistent organic pollutants (Stockholm Convention) and hazardous waste (Basel Convention). These substances are all used, stored and disposed of correctly.



# COMMUNICATION & SOCIAL MEDIA

We have established a clear brand image for the Motel One and The Cloud One Hotel brands, presenting ourselves to the public in traditional and social media with coordinated, appropriate and respectful language. Official statements and communication about the Motel One Group are issued exclusively by the Marketing Department or the Management Board.

If employees actively use social networks, in particular when their comments or posts are connected to the Motel One Group in any way, they must comply with applicable laws, the rules of the social media platform used and with internal guidelines and policies.





# INFRINGEMENTS AND THEIR CONSEQUENCES

Mistakes can happen in our daily work. However, it is important that we all uphold the One Code and, if in doubt, ask questions and obtain information promptly,

as non-compliance with the One Code can have serious consequences for both the Motel One Group and those concerned. The Motel One Group's reputation could be damaged or it could be held legally liable.

Violations of the One Code may, in particular, result in fines or penalties for the company and those responsible, as well as disciplinary procedures that may include dismissal or termination of employment.



## **QUESTIONS AND CONCERNS**

If you have any questions regarding the One Code or the internal policies and guidelines, please contact the Motel One Group Compliance Officer.

This also applies if you suspect possible violations against the One Code, the internal guidelines or applicable laws and regulations.

Your questions and reports will be treated confidentially. We do not tolerate any kind of discrimination against those who have made reports in good faith. Deliberate false reports, on the other hand, are not permitted.

In myOne you will find a link through which you can anonymously contact the Group Compliance Officer.



### YOUR CONTACT

Group Compliance Officer Motel One GmbH Tegernseer Landstrasse 165 81539 Munich, Germany compliance@motel-one.com