



OETKER COLLECTION

Masterpiece Hotels

CORPORATE SUSTAINABILITY REPORT 2018

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1.0 About this Report

The 2018 Corporate Sustainability Report provides an account of Oetker Collection efforts to support the implementation of the UN Ten Principles and engage with the UN Global Compact. The report is a transparent overview of the Group's Corporate Social Responsibility (CSR) performance in line with Oetker Collection 2015 CSR Strategy.

The Executive Committee has agreed in January 2018 to produce a formal reporting on corporate sustainability in line with the UN Global Compact Communication on Progress.

2.0 Reference Framework

The report covers the period 1 January 2018 to 31 December 2018 and it will be provided on an annual basis. It includes information from all 9 Oetker Collection masterpiece hotels. These include L'Apogée Courchevel, Brenners Park-Hotel & Spa, Le Bristol Paris, Château Saint-Martin & Spa, Eden Rock - St Barths, Hotel du Cap-Eden-Roc, Jumby Bay Island, The Lanesborough and Palácio Tangará

Eden Rock – St Barths closed at the end of August 2017 due to Hurricane Irma, and remained closed in 2018 with only a small proportion of operations active. This property has consequently been excluded from some quantitative data analysis (namely in section 13.2 Environmental Monitoring), but information has been provided where possible.

Fregate Island Private is no longer part of the Oetker Collection.

3.0 Organisation Overview

GROUP COMPANY COVERED BY THIS CSR REPORT: Oetker Collection

OVERVIEW: Management and operation of high-end luxury hotels worldwide

MANAGEMENT: The German company Oetker Hotel Management Company GmbH (OHMC) manages Oetker Collection

HEADQUARTERS: Baden-Baden, Germany

EMPLOYEES: Approx. 2250

MARKETS: The tourism and hospitality industry in Antibes (France), Antigua (private island), Baden-Baden (Germany), Courchevel (France), London (Great Britain), Paris (France), Sao Paulo (Brazil), St Barthelemy (France), Vence (France).

Customers are individuals from worldwide markets.

WEBSITE: <https://www.oetkercollection.com/>

REVENUE: Report annual business revenue: 286M €

ASSOCIATIONS: The Leading Hotels of the World

AWARDS: 2nd place of the Top 20 Hotel Brands by Travel & Leisure. Several awards were also attained by individual hotels of the Oetker Collection.

4.0 Reporting Structure and Content

Oetker Collection's process for defining the report content and boundaries is based on the organizations' 2015 CSR strategy. The CSR strategy focalizes on the principles and commitments intrinsic to the company's overall strategy, governance and decision-making process. The process by which the CSR Strategy has been developed is illustrated in section 8.1 Baseline.

Furthermore, the report structure and content is in line with the UN Global Compact Communication on Progress. Lastly, it provides an initial alignment to GRI Standards – Core option.

5.0 List of Material Aspects

The following aspects have been identified as material to the current Oetker Collection CSR processes:

- Governance
- Human Rights
- Working Relations and conditions
- Environment
- Guests
- Fair operating practices
- Communities and local development

The report includes the communication of all material aspects managed both centrally by the Group as well as de-centrally managed by the individual Hotels. The methodology by which the material aspects have been determined is illustrated in section 8.1 Baseline.

5.0 List of Material Aspects

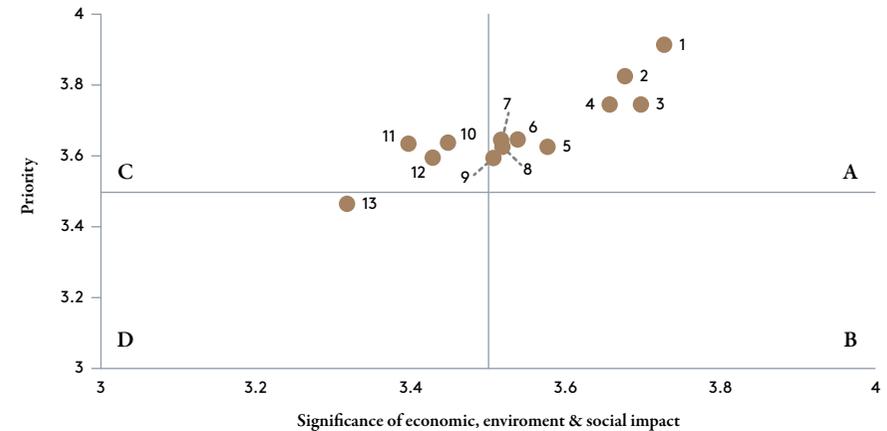
In preparation for the new Oetker Collection Corporate Responsibility Strategy (2019 effective), Group CSR Team undertook a materiality analysis in line with the GRI methodology. Topics included in this analysis were determined by merging topics from a number of sources, including the WTTC 2017 publications on sustainability reporting and GRI's own Sustainability Topics for Sectors Report. The list of topics extends beyond those covered by the current strategy, and include:

- Guest Engagement & Satisfaction 1 and i
- Human rights and labor standards 2 and ii
- Economic growth 3 and iii
- Health & Safety 4 and v
- Innovation 5 and viii
- Local environment 6 and ix
- Risk Management 7 and vi
- Diversity, equality and engagement 8 and iv
- Local Regulations 9 and xii
- Responsible procurement 10 and vii
- Anti-corruption policies 11 and xii
- Governance 12 and xi
- Local community 13 and xiii

The results of the analysis, based on stakeholder feedback (comprising only the Head of Departments from each property), can be seen in the charts to the right. From 2019, we aim to align our CSR report with the topics identified as material (quadrants A, to right).

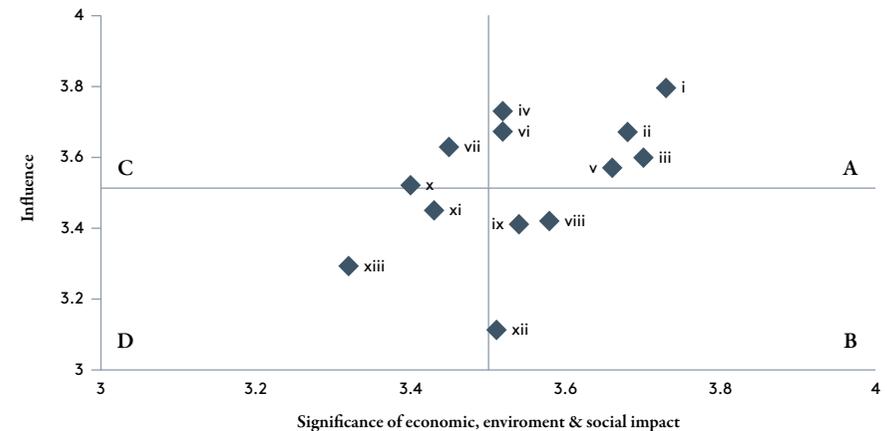
Quadrant A (1 – 9): Material aspects with the greatest stakeholder priority and where the group can have the greatest impact.

VISUAL PRIORITIZATION OF TOPICS FOR REPORTING



Quadrant A (i – vi): Material aspects with the greatest influence on Oetker Collection and where the group can have the greatest impact.

VISUAL PRIORITIZATION OF TOPICS FOR STRATEGY



6.0 CEO's Foreword

Having completed our first UN Global Compact Report last year for 2017, we have over the last 12 months striven to achieve the 'advanced' level for 2018 level by increasing our engagement with our stakeholders, in particular our suppliers, to drive transparency into our supply chain.

We at Oetker Collection are aware of the fact that our guests are not only consumers but also citizens who are concerned about the future of our planet too, some of them being deeply committed to defending environmental and social causes.

In view of the ratification of the Paris Climate Agreement and the UN Agenda 2030 for Sustainable Development, Oetker Collection is committed in all its actions to contributing to the achievement of both these goals.

Oetker Collection is a collection of currently 9 exceptional hotels, located in Europe, the Caribbean and Brazil, as well as 8 Masterpiece Estates mainly located in the United Kingdom, Scotland and Ireland.

At Oetker Collection we believe that a service of excellence is about meaningful connections to make unforgettable experiences. Our outstanding members of staff, into whom we invest a majority of our resources, deliver these precious connections. But these meaningful connections also stem from our beautiful properties and their natural surroundings for which we all see ourselves being responsible patrons.

We therefore strive to share our vision on our social and environmental responsibility with all of our team members, ensuring that each and everyone becomes a responsible patron for his and her surrounding.

Our business model is very simple and yet extremely demanding: to provide our guests with a flawless service in a refined backdrop and ensure that their stay is an experience they will look back on with pleasure.

We believe that being part of Oetker Collection should be synonymous with a respect for human kind as well as nature and all its species. The value we share with our guests on this unites us.



Our commitments in favour of Social and Environmental Responsibility, endeavour to further Sustainable Development on all fronts and incorporates a very comprehensive stance:

- They are directly related to our business model and therefore a strategic lever
- They are an instrument to continuously drive change and integrate innovation
- They are distributed to all the operational and functional departments, which are on the front line (a dedicated CSR structure providing the driving force and playing an expert and coordinating role)
- They are understood and embraced as well as lived by all employees
- They are a journey we take our guests on, creating engagement and unique experiences

Frank Marrenbach
CHIEF EXECUTIVE OFFICER

7.0 Oetker Collection Profile

7.1 2018 Vision

Oetker Collection is one of the most inspiring selections of hotel masterpieces in the world. Each property is one-of-a-kind, reflecting the unique European heritage.

In the next decade we foresee up to 15 individual places with soul, carefully nurtured by fine hoteliers who create a strong sense of belonging for our guests.

7.2 Oetker Collection embraces nine luxury hotels

- **L'APOGÉE COURCHEVEL** – a luxury chalet with a warm and family atmosphere offering the most desirable skiing experience at the top of Courchevel 1850 in the French Alps.
- **BRENNERS PARK-HOTEL & SPA** – an iconic grand hotel, amidst a sprawling private park in Baden-Baden, Germany and historic Villa Stéphanie now offers Europe's most refined and innovative spa experience.
- **LE BRISTOL PARIS** – an authentic vibrant French palace completely refurbished, the ultimate reference for Parisian art-de-vivre, ideally located on the prestigious rue du Faubourg Saint-Honoré.
- **CHÂTEAU SAINT-MARTIN & SPA** – a romantic property of excellence nestled in the heart of the French Riviera, boasting breath taking views over the Mediterranean coastline.
- **EDEN ROCK – ST BARTHS** – a luxurious retreat in St Barths built on a rocky promontory, surrounded by white sandy beaches, and turquoise sea; French art-de-vivre in the heart of the Caribbean.
- **HOTEL DU CAP-EDEN-ROC** – a legendary luxury hotel at the centre of a scenic private park, where old-world glamour meets modern luxury at the tip of the Cap d'Antibes.
- **JUMBY BAY ISLAND** – a private and heavenly island in the Caribbean; its personality knows how to capture the imagination and reveals the island's natural beauty.
- **THE LANESBOROUGH** – classically British service in a remarkably vibrant and elegant London residence.
- **PALÁCIO TANGARÁ** – surrounded by the Burle Marx Park, a veritable oasis in the centre of São Paulo's vibrant urban landscape.

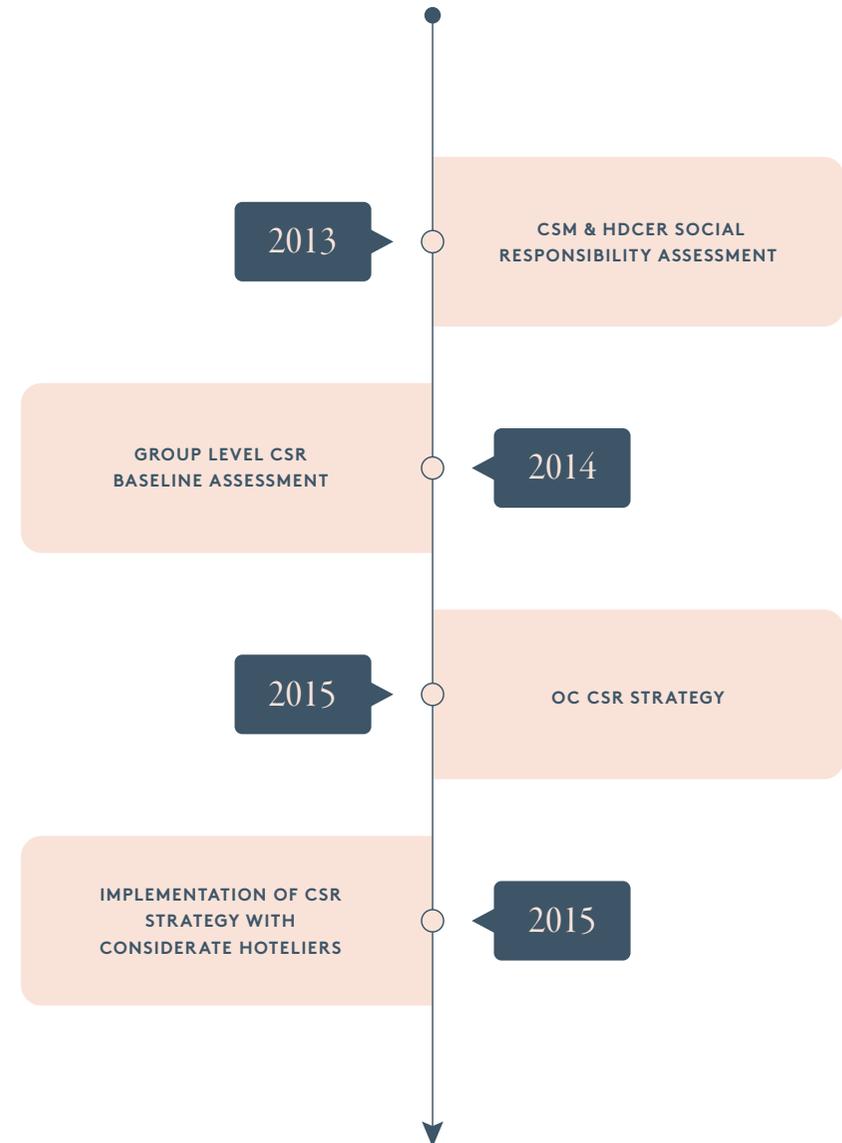
8.0 Corporate Social Responsibility

8.1 Baseline

In 2013 Hotel du Cap-Eden-Roc and Château Saint-Martin & Spa undertook a Social Responsibility assessment, carried out by an external French CSR firm. This assessment covered the 7 core subjects of the ISO26000 international standard, which lays down the scope of Social Responsibility for an organisation. The assessment also included 6 additional subject areas related to governance (Afnor X 30-031 benchmark document).

Out of the 35 fields of actions, which were deemed to be relevant, the one area for improvement (on a governance level) concerned stakeholder engagement. The assessment referred to “a relation/ cooperation with the stakeholders” which could be strengthened by measures that:

- Identified priority stakeholders including the impacts of their decisions and activities, corresponding risks and opportunities, as well as establishing appropriate communication channels.
- Understood their interests depending on the subjects in question (chain value, region, professional sector, etc.)
- Included these interests in decisions with possible arbitration.



8.1 Baseline

Following from the assessment, in 2014 the management of the French properties conducted an analysis of their stakeholders, dividing their stakeholders into 8 categories:

SHAREHOLDERS

Oetker Collection

PARTNERS

Service partners
Representatives
Oetker partner hotels
Relais & Chateaux

EMPLOYEES

Administrative staff
Accommodation staff
Catering staff
Technical staff
Future employees

COMMUNITIES, CIVIL SOCIETY & NGOs

Red Cross Association
Les Aquanautes Association
Planete Urgence Association
Various local associations
Neighbours
NATURA 2000

GUESTS & CONSUMERS

Resident guests
External guests
Prospective guests

SUPPLIERS

Partner suppliers
Key account suppliers
Local suppliers

PUBLIC AUTHORITIES & COMPLIANCE

Social bodies
Tax bodies
Regulatory bodies
Safety commission
Green Globe Certification

MEDIA & COMMUNICATION

VIP Press (Gala, Figaro...)
Generic press (Innovation SPA, Nice RV)
TV
PR Agencies
Social Media
Fairs & Exhibitions
Vocational Training Schools
Trade Unions



8.1 Baseline

Management established dialogue priorities with the stakeholders, once the French properties' stakeholders were identified:

DIALOGUE PRIORITY WITH THE STAKEHOLDERS

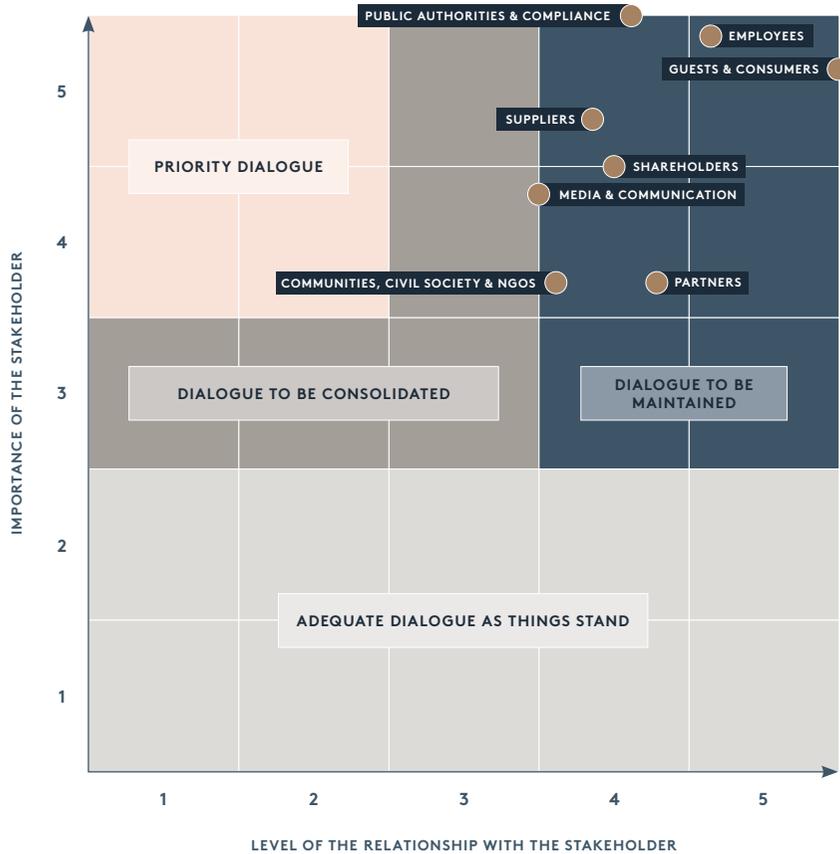


FIGURE 1. Château Saint-Martin & Spa and Hotel du Cap-Eden-Roc Dialogue Priority with the Stakeholders

The assessment conducted by Château Saint-Martin & Spa and Hotel du Cap-Eden-Roc led Oetker Collection to approach social and environmental responsibility at group level.

In order to assess CSR progress in each establishment, Julie Poirot, Regional Corporate Social Responsibility Manager, developed an audit document based on various reference materials and models: UN Global Compact, ISO 2000 and Green Globe. Ultimately, the audit document represented material aspects of Oetker Collection Corporate Social Responsibility. For the audit and future CSR endeavours Oetker Collection Executive Committee appointed a CSR officer in each hotel.

CSR officers from July to November 2014 internally assessed their property. Assessed properties included:

- Le Bristol Paris (BRI)
- Brenners Park-Hotel & Spa (BREN)
- Hotel du Cap-Eden-Roc (HDCER)
- Château Saint-Martin & Spa (CSM)
- Eden Rock – St Barths (ER)
- Palais Namaskar (PNM) (no longer part of the Oetker Collection).

The other five establishments were not assessed as:

- Fregate Island Private – results were not received (no longer part of the Oetker Collection)
- L'Apogée Courchevel – the establishment only opened in 2013
- The Lanesborough – establishment was added to the collection in November 2014
- Palácio Tangará – establishment was added to the collection in June 2017
- Jumby Bay Island – establishment was added to the collection in October 2017

A new baseline will be set next year for the 2019 Oetker Collection Corporate Responsibility Strategy.

8.1 Baseline

The internal audit results were the following:

TABLE 1. Oetker Collection 2014 Internal Audit Results

CORE SUBJECT	FIELD OF ACTION	BRI	BREN	PNM	ER	HDCER	CSM	AVERAGE
GOVERNANCE	Strategic approach and objectives							
	Steering, implementation and control							
	Performance control							
	Relations with stakeholders							
		3,57%	3,57%	39,29%	0,00%	89,29%	89,29%	37,50%
HUMAN RIGHTS, WORKING RELATIONS & CONDITIONS	Discrimination and vulnerable groups							
	Fundamental rights and employment law							
	Working conditions and social protection							
	Social dialogue							
	Health and safety at work							
	Development of human capital							
		92,02%	88,45%	80,15%	45,48%	86,66%	86,66%	73,32%
ENVIRONMENT	Regulations							
	Communication and raising awareness							
	Pollution prevention							
	Recycling and reuse							
	Sustainable use of resources							
	Climate Change mitigation and adaptation							
	Protection of the environment, biodiversity, and rehabilitation of natural habitats							
		46,67%	38,33%	35,83%	28,33%	56,67%	60,00%	39,58%
GUESTS, FAIR OPERATING PRACTICES	Promoting a local sustainable consumption							
	Education and awareness raising							
	Fight against corruption							
	Promotion of social responsibility in the value chain							
	Respect for property rights							
		57,81%	57,69%	31,01%	42,43%	72,84%	75,96%	49,22%
COMMUNITIES AND LOCAL DEVELOPMENT	Education and culture							
	Job creation skills development							
	Creation of wealth and income							
		53,85%	50,00%	65,38%	73,08%	57,69%	73,08%	50,00%
		56,25%	51,56%	45,94%	41,56%	70,00%	71,13%	49,48%

The audit demonstrated the social theme, with core subjects 'human rights' and 'working relations and conditions,' scoring best throughout all establishments with averages of 69.64% and 75% respectively.

Governance, with a score of 37.50%, and environment with an overall average of 39.58%, were not integrated in all establishments.

Based on the audit results, the two targets for Oetker Collection CSR were governance and environment.

Following from the audit results and targets Julie Poirot developed a group CSR Strategy in 2015.

8.2 Oetker Collection CSR Strategy

GOVERNANCE: Governance encompasses all the measures, rules, decision-making, information and monitoring bodies, which ensure the smooth running and control of an organisation.

Based on this diagnostics, it became clear that a CSR strategy had to be drawn up to define and identify joint objectives, commitments and principles through the governance subject.

OUR VISION

Oetker Collection has chosen to make the most of its know-how, savoir vivre and social skills to develop and sustain the future of generations to come in the long term.

OUR VALUES

Protect, respect and develop sustainable solutions.

OUR MISSION

Oetker Collection family is guided by common values and goals, especially regarding social and environmental development. It is this new commitment that allows us to be closer to our guests.

OUR MOTTO & LOGO



**PATRONS FOR A SAFE AND
GUARANTEED FUTURE**

8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals

<p>COMMITMENT 1</p> <p>Ensure respect for human rights and optimise our working conditions</p>	<p>5 GENDER EQUALITY</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>10 REDUCED INEQUALITIES</p> 	<p>1.1. Ensure that each of our employees and stakeholder is treated fairly while fighting against discrimination.</p> <p>1.2. Promote an optimum quality of life at work and support social dialogue.</p> <p>1.3. Encourage the development and employability of our employees.</p>
<p>COMMITMENT 2</p> <p>Control our consumption and protect our environment</p>	<p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> 	<p>13 CLIMATE ACTION</p> 	<p>14 LIFE BELOW WATER</p> 	<p>2.1. Through innovation reduce our resource consumption.</p> <p>2.2. Understand, protect and restore the biodiversity that surrounds us.</p> <p>2.3. Apply waste regulations and strive to limit any type of pollution.</p>
<p>COMMITMENT 3</p> <p>Guarantee a service of an exceptional and sustainable quality increasing the awareness of our guests and our staff on social responsibility</p>	<p>4 QUALITY EDUCATION</p> 		<p>3.1. Guarantee an impeccable and responsible service through fair operating practices.</p> <p>3.2. Encourage our guests and staff to contribute to our vision of a sustainable future.</p>	
<p>COMMITMENT 4</p> <p>Take part in the social, cultural and economic development of the regions in which we operate</p>	<p>17 PARTNERSHIPS FOR THE GOALS</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>4.1. Favour local producers who are a guarantee of the rich heritage of our region.</p> <p>4.2. Commit alongside our partners in sustainable projects that are linked to the values we defend.</p>	

8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals

This policy was validated by the Executive Committee in December 2015 and will be revised every 5 years. 2019 is the last year by which the 2015 CSR Strategy will be viable.

Every year CSR objectives are established to achieve the commitments and principles set in the CSR policy.

5 objectives were established for 2015:

- A** Raise the awareness of 90 % of our employees on social responsibility.
- B** Reach the score of 4 on the Opinion Survey on the “communication, training and career prospects” questions.
- C** Measure and compare our water and energy consumption.
- D** Incorporate sustainable purchasing in the purchasing strategy.
- E** Reach the figure of 30 % of local suppliers out of our total number of suppliers.

6 objectives were established for 2017:

- A** Ensure gender equality, optimal health and safety conditions for all employees.
- B** Measure, compare and reduce our water and energy consumption.
- C** Establish a comprehensive and integrated communication strategy for all CSR activities.
- D** Create an internal Green Champion Award system.
- E** Establish a new sustainable product for each month of the year, favouring local suppliers where possible.
- F** Create relationship with local charity.

5 objectives were added for 2018:

- A** Establish equality label by March 2018.
- B** Reduce electricity, water, fuel & heat consumption.
- C** Complete all of the 2017 & 2018 CSR Standards by the end of 2018.
- D** Create an internal Green Champion Award system.
- E** Ensure completion of CSR Survey by 100% of Group suppliers.

Due to the change in CSR management structure in 2015- 2016, the 2015 objectives a, b and e were not monitored. Also, objectives set for 2017 (b and c) are flawed as they do not have specific absolute or intensity based target, timescale and key performance indicators. Below is a summary of the 2015, 2017 and 2018 objectives and their status quo.

8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals

TABLE 2. 2015, 2017 and 2108 Oetker Collection CSR Objectives

2015 OBJECTIVES	A	Raise awareness of 90% of our employees on social responsibility	IN PROGRESS
	B	Reach the score of 4 on the Opinion Survey on the “communication, training and career prospects” questions	NOT ACHIEVED
	C	Measure and compare our water and energy consumption	ACHIEVED
	D	Incorporate sustainable purchasing in the purchasing strategy	ACHIEVED
	E	Reach a figure of 30% of local suppliers out of our total number of suppliers	IN PROGRESS
2017 OBJECTIVES	A	Ensure gender equality, optimal health and safety conditions for all employees	IN PROGRESS
	B	Measure, compare and reduce our water and energy consumption	ACHIEVED
	C	Establish a comprehensive and integrated communication strategy for all CSR activities	ACHIEVED
	D	Create an internal Green Champion Award system	ACHIEVED
	E	Establish a new sustainable product for each month of the year, favouring local suppliers where possible	IN PROGRESS
	F	Create a relationship with a local charity	ACHIEVED
2018 OBJECTIVES	A	Establish equality label by March 2018	IN PROGRESS
	B	Reduce electricity, water, fuel & heat consumption.	IN PROGRESS
	C	Complete all of the 2017 & 2018 CSR Standards by the end of 2018	IN PROGRESS
	D	Create an internal Green Champion Award system.	ACHIEVED
	E	Ensure completion of CSR Survey by 100% of Group suppliers.	IN PROGRESS

The 2019 objectives will be more specific to better monitor CSR performance.

9.0 CSR Governance

Following the development of the CSR Strategy the Oetker Collection's CSR work is supported and developed by an external company, Considerate Group. Considerate Group is a specialist company that helps businesses from the hospitality sector, and other industries linked to it, to operate more responsibly.

Considerate Group is Oetker Collection CSR Team and is held accountable for the implementation of Oetker Collection CSR Strategy. Considerate Group is assisted by CSR Patrons (previously known as CSR Officers) from each property (table 3). CSR Patrons work in collaboration with their property CSR team to implement responsible actions. In order to assess CSR progress in each establishment, Considerate Group distributes a quarterly questionnaire to every CSR Patron.

TABLE 3. List of Oetker Collection 2018 CSR Patrons and Teams

HOTEL	CSR PATRON	CSR TEAM
BRENNERS PARK-HOTEL & SPA	Pierre Laurent SCHAEFER	Brenners Green Keeper
THE LANESBOROUGH	Ana GRILLO	Green Pearl
LE BRISTOL PARIS	Matthieu BOURDON Chloe LEIGNADIER	Bec Green
HOTEL DU CAP-EDEN-ROC	Julie POIROT	Eden Earth
CHÂTEAU SAINT-MARTIN & SPA		Team Avence
L'APOGÉE COURCHEVEL		BlablApogee
EDEN ROCK – ST BARTHS	Chloe GANSOINAT	Eden Angels
PALÁCIO TANGARÁ	Carlos Fabbris	Burle Birds
JUMBY BAY ISLAND	Marie-Claire Gandin	TBC

The table below depicts Considerate Group's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group.

TABLE 4. Considerate Group stakeholder engagement

HOTEL	STAKEHOLDER	FREQUENCY & TYPE	DIRECT/INDIRECT
EMPLOYEES	CEO	Monthly call	Direct
	Purchasing Team	Quarterly e-mail & call	Direct
	PR & Communications	Quarterly e-mail & call	Direct
	Human Resources	Monthly e-mail & call	Direct
	CSR Patrons & Teams	Monthly e-mails & ad-hoc calls, meetings	Direct
	Technical Staff	Monthly e-mails & ad-hoc calls, meetings	Direct
	General Manager	Monthly e-mails & bi-monthly meetings	Indirect
	Operations Staff	Monthly e-mails	Indirect
GUESTS & CONSUMERS	All Oetker Collection staff	Internal Social Media System 'Pearlnet' monthly postings	Direct
	Guests	Visual communication in hotels & website	Indirect
SUPPLIERS	Group suppliers & individual hotel suppliers	Annual survey	Indirect

The remainder of the report will present 2018 Oetker Collection CSR actions in line with the Group's CSR Strategy. Considerate Group will be referred to as Oetker Collection CSR Team or Group CSR Team.

10.0 CSR Standards

In 2017 Oetker Collection CSR Team developed 12 CSR Standards to establish tangible actions for Oetker Collection CSR Strategy. These CSR Standards were applied in 2018, and seven new standards were added as follows:

1	MSC certified fish for all staff canteens and at least 30% in the restaurants				
2	Recycle Nespresso capsules with B2B service or replace with biodegradable capsules				
3	Use Fairtrade certified products. IF you can't source Fairtrade certified products then know coffee, tea supplier's fair terms of trade with farmers				
4	Use only free range and organic eggs as well as poultry & avoid purchasing meat from intensive mass animal farming				
5	Reduce plastic cups in staff canteens & all plastic material in-room e.g. plastic bottles, laundry delivery bags, slippers sleeves, newspapers bags				
6	Give guests the choice to change their towels and sheets at two days interval				
7	Use biodegradable cleaning and laundry products				
8	Place guest room recycler baskets & recycling bins both in public areas (i.e. poolside), kitchen and back of house				
9	A Giving Bags provide the guest with the possibility to donate their clothes to charity B Bathroom amenities and soaps: giving to charities that have recycling programmes for these				

10.0 CSR Standards

10 Complete LED retrofits already started and share best practice with other engineers within Oetker Collection					
11 Use FSC certified paper and tissues or aim for paperless communication					
12 Do not plant non-native invasive or endangered species					
13 Indicate local products and dishes in all room service and restaurant menus.					
14 Place note describing recycling program with every Nespresso machine					
15 Create an 'Energy Savings' event to engage staff and guest					
16 Commence discussions to use renewable energy utility contracts					
17 Provide Responsible Purchasing Supplier Questionnaire to suppliers with greatest impact on hotel's costs					
18 Communicate and implement Group Equality Label					
19 Replace chlorine in pools with alternative options					

10.1 2018 CSR Standards Results

All Oetker Collection properties addressed the CSR Standards in 2018; results are the following:

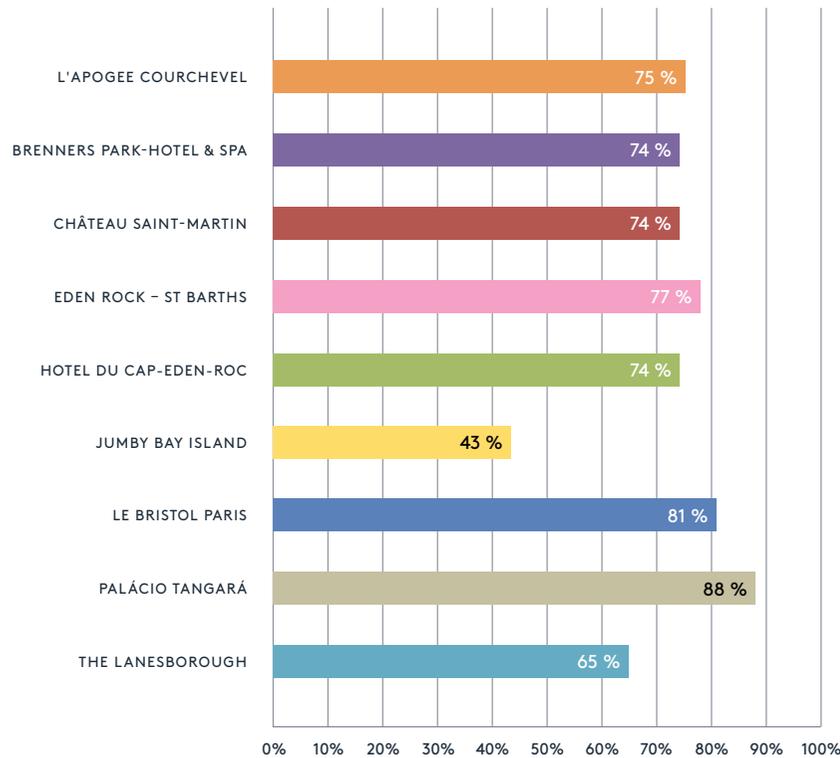


FIGURE 2. Oetker Collection property CSR Standard performance in 2018

Eden Rock - St Barths, Le Bristol Paris and Palácio Tangará led the Oetker Collection Group having achieved more than 75% of the 19 standards.

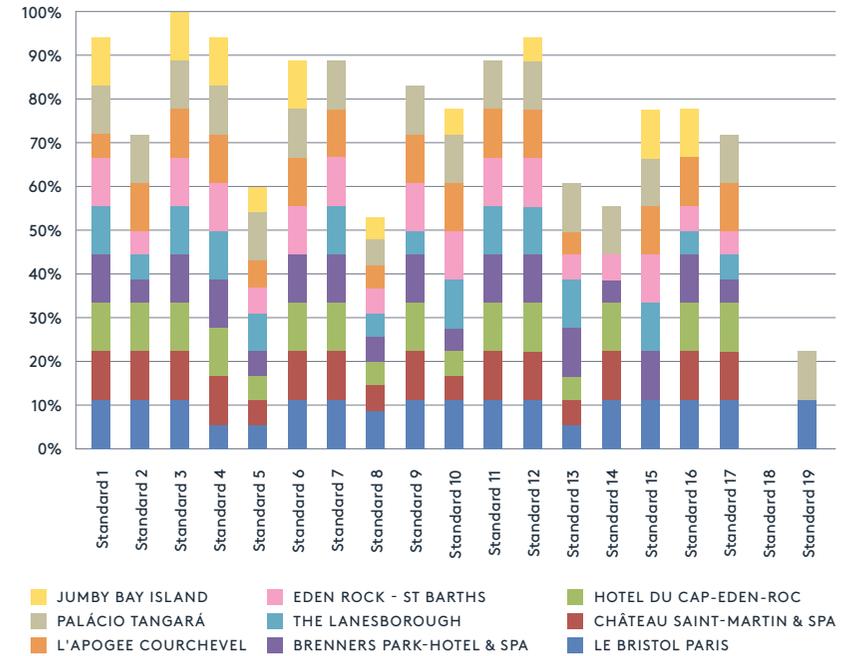


FIGURE 3. Oetker Collection CSR Standard performance

Standard 3 has been implemented by all Oetker Collection properties in full, and Standards 1, 4, 5, 8, 10 and 12 have been addressed by all properties either partially or in full. Standard 18 has not been implemented by any property, and Standard 19 has only been implemented by Eden Rock - St Barths and Palácio Tangará; nonetheless, it is important to note that these two standards were new in 2018. Jumby Bay Island has implemented fewest standards among the Oetker Collection properties, however consideration should be given to the fact this property joined the Group in 2018 and that the resort was with interim management all year, with no CSR team.

10.2 CSR Standards Objectives

For 2019 some of the current standards will be amended and 8 new standards will be added in order to drive forward the Group's CSR Strategy objectives. Standard 19 will be removed owing to legislative and infrastructural impediments. The 2019 CSR Standards will also be re-ordered to align with the Oetker Collection CSR Commitments, in order to streamline the Group's CSR Strategy. In 2019 Group CSR Team will continue working with all CSR Patrons and properties to achieve all CSR Standards.



11.0 Sustainability Awards & Certifications

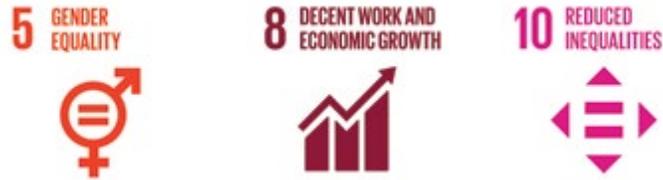
UN GLOBAL COMPACT ADVANCED LEVEL

- Hotel du Cap-Eden-Roc
- Château Saint-Martin & Spa
- L'Apogée Courchevel



12.0 Commitment 1

Ensure respect for human rights and optimise our working conditions



- 1.1. Ensure that each of our employees and stakeholder is treated fairly while fighting against discrimination.
- 1.2. Promote an optimum quality of life at work and support social dialogue.
- 1.3. Encourage the development and employability of our employees.

12.1 Organization Overview

The total number of Oetker Collection employees in 2018 was 2250. In 2018, the Group implemented a common HR software called Talent Soft to collect more employee data – this will be available from 2019. Prior to implementing Talent Soft, each individual property collected employee information and hotels regularly ran workforce reports to match with budget.

Employees perform 99% of the organization's activities with 1% of work being performed by external consultants with a commercial signed agreement. Due to the nature of the hospitality industry and location of specific hotels, there are seasonal variations in employee contracts. Seasonal hotels include Hotel du Cap-Eden-Roc, Château Saint-Martin & Spa and L'Apogée Courchevel in France, Eden Rock – St Barths in St. Barthelemy and Jumby Bay Island in Antigua.

The OHMC Executive Committee, HR Corporate team, Hotel Managing Director – General Manager and Hotels HR Leader are responsible for the implementation of Human and Labour Rights policies at group and property level.

12.2 Human Rights, Working Relations & Conditions

Oetker Collection respects internationally recognised human rights frameworks, including the Universal Declaration of Human Rights and European Convention of Human Rights and Labour Laws. Oetker Collection Code of Conduct is the company's stand-alone statement of policy expressing their commitment to respect and support human rights. The document lays emphasis on the following points: ban on moral and sexual harassment, right to respect human dignity, refusal of any form of discrimination (relating to recruitment, to the manner in which they are treated and included in the team, career prospects, training and communication, and equal opportunities). To ensure its distribution, Oetker Code of Conduct is attached as an addendum to employment contracts for management team members and integrated in handbooks for non-management team members. The Code of Conduct is monitored in each hotel through:

- HR Corporate Audit
- Strategic Priorities Matrix report completed at least once a month by HR teams at each hotel. The report includes employment/legal risks situations and legal cases.

The Executive Team periodically reviews legal compliance and alignment of Oetker Collection Values, Philosophy and Principles and respect of Oetker Code of Conduct.

All Oetker Collection employees are covered by a collective bargain agreement. Employees can view their rights and responsibilities and their compensation and benefits through their employment contract, collective bargain agreement, property handbook and welcome book. Also, hotels in France, Germany, Brazil and Antigua have Work Councils and Unions, open to dialogue and exchange; the properties undergo mandatory formal meetings on human rights and consultations on working conditions.



12.2 Human Rights, Working Relations & Conditions

If team members or if a group of team members have a grievance, they can reach the following groups to expose their situation: HR Hotel Team, HR Corporate, OHMC Executive Team, Work Council Representative, Union Representative, Local Labour Law Authorities, Industry or Labour Court. If an incident of Human Rights abuse occurs, an internal inquiry is conducted by HR Hotel Team under the supervision of HR Corporate. If the inquiry proves the allegation is right, a disciplinary process is applied, with termination of the employee who causes the abuse.

To address labour policies, reduce labour risks and respond to labour violations HR Corporate has:

- conducted employment legal risks assessments in, UK, France, Brazil and Antigua
- received support from professional experts and labour law lawyers, to understand local practices, anticipate and assess risk, assess current litigation and deploy labour law strategy as aligned with business strategy
- trained and coached local HR Leaders
- organised internal meeting with General Manager and/or Executive Committee Members
- distributed an opinion survey (annually distributed with action plan follow up)
- held Health & Safety Committee meetings in operations based in France, Germany and Brazil
- held internal meetings with the participation of all team members: Direct Line Meeting or General Assembly or Town Hall meetings and Department Meetings.

If a property incurs an incident of violation of labour principles it will inform Work Council and/or Union to conduct an internal inquiry. If needed an employee representative will attend the inquiry interviews. Work Council and/or Union will be presented with a written report of incident findings. A disciplinary process will apply following the evaluation of the incident, with possible termination of employee contract. HR Corporate will analyse and assess the incident with support and consultation of experts, labour law lawyers, resulting with the implementation of immediate actions. The incident will be provided as an anonymous case study to other hotels for guidance and prevention. HR Leaders will be trained and coached to share best practice throughout the organisation.



12.2 Human Rights, Working Relations & Conditions

There were no Human Rights incident reports in 2018. Two seasonal properties faced legal cases regarding permanency of employment contracts. OHMC HR Corporate took the following actions as a result:

- Trained of Executive Committee Members and Head of Departments in April 2018 – this was delivered by a labour lawyer and HR Corporate.
- Established a process to comply with Supreme Court rulings – this was created by a labour lawyer and OHMC HR Corporate, and was diffused to seasonal hotels in France in August 2018.

Engagement is a feeling produced by the addition of the satisfaction and involvement at work. It is composed by the addition of satisfaction at work and job involvement:

- Satisfaction at work is the correlation between the expectations and what is obtained in the work.
- Job involvement is the work attachment and employee identification with his/her job or professional role.

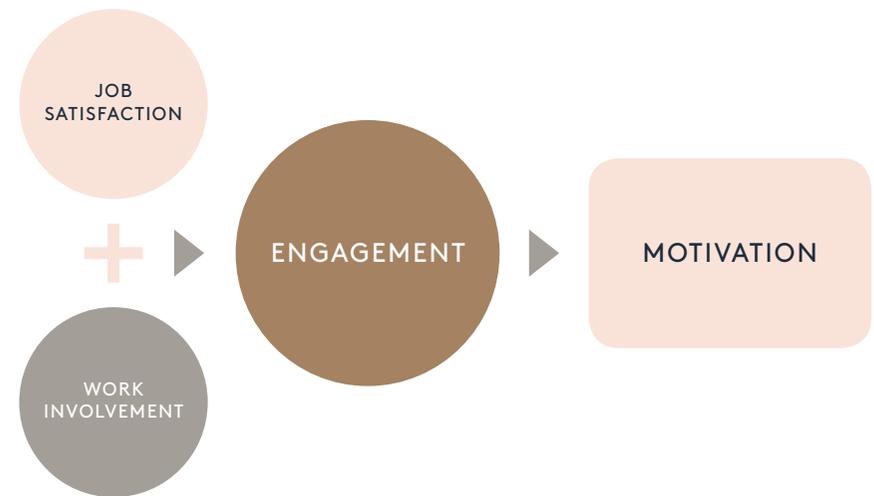


FIGURE 4. Oetker Collection Engagement Measurement

12.2 Human Rights, Working Relations & Conditions

ENGAGEMENT DRIVERS MEASURED



Oetker Collection – Confidential & Proprietary information

FIGURE 5. Oetker Collection Engagement Drivers Measured

The Engagement Survey is composed of five questions related to satisfaction and to involvement:

1. All things considered, I am satisfied with my job at this hotel
2. I am proud to work for Oetker Collection
3. I am proud to work for this hotel
4. I would recommend my hotel to family and friends as place to work
5. I would recommend Oetker Collection to others seeking a job

Survey results are used to create an Index on a scale maximum of 5 points:

The Engagement is measured through an Index on a scale maximum of 5 points:

TABLE 5. Oetker Collection Engagement Results

2018	LBP	BP	HDCER	CSM	AC	ER	LAN	PT	JBI
DATE	November 2017	March 2018	August 2018	September 2018	March 2018	Closed	February 2018	March 2018	From 2019
PARTICIPATION	80,00%	79,30%	94,33%	92,36%	93,00%		96,00%	91,00%	
RESULTS / ENGAGEMENT INDEX*	4,50	4,00	4,66	4,38	4,56		3,94	4,25	

KEY TO HOTEL NAME ABBREVIATION:

BPH	Brenners Park-Hotel & Spa	HDCER	Hotel du Cap-Eden-Roc	LAN	The Lanesborough
CSM	Château Saint-Martin & Spa	AC	L'Apogée Courchevel	PT	Palácio Tangará
ER	Eden Rock – St Barths	BP	Le Bristol Paris	JBI	Jumby Bay Island

12.2 Human Rights, Working Relations & Conditions

The group believes that education is key to develop and sustain the long-term future of generations to come. Oetker Collection is progressively deploying Oetker Collection Academy to encourage the development and employability of staff. The Academy is a comprehensive and continuing project that considers the entire learning development strategy of Oetker Collection. Oetker Collection Academy is inspired by Dr. Oetker's motto "Once you stop striving to be better, you stop being good".

The learning concept is composed of 4 different phases: Engage, Educate, Enhance, and Excel. Each of the phases have specific learning programs with defined contents. When delivering the programs in the Collection, their format is adapted to respond to each hotel context and circumstances.



2018 RESULTS FOR OETKER COLLECTION ACADEMY:

TABLE 6. Total number of Oetker Collection Academy activities

TOTAL PROGRAMS	TOTAL SESSIONS	TOTAL HOURS OF TRAINING	TOTAL PARTICIPANTS
17	71	462	1002

12.3 Property Actions & Processes

The information listed below provides highlights on actions performed by each Oetker Collection property to act on Commitment 1 of the Group CSR Strategy.

TABLE 7. Oetker Collection Commitment 1 property actions and processes

ACTIONS/ PRO-JECTS /INITIATIVES	BPH	CSM	ER	HDCER	AC	BP	LAN	PT	JBI
Work Councils & Unions	✓	✓	✓	✓	✓	✓		✓	✓
Apprenticeships, work experience and internships/ placements	✓	✓	✓	✓	✓	✓	✓	✓	✓
Themed lunches for staff	✓	✓	✓	✓	✓	✓	✓	✓	✓
Gender Equality Review	✓	✓	✓	✓	✓	✓		✓	✓
Employment Risk Assessment	✓	✓	✓	✓	✓	✓	✓	✓	✓
Staff Wellness Benefits	✓	✓	✓	✓	✓	✓	✓	✓	✓
Health & Safety Committee Meetings & Trainings	✓	✓	✓	✓	✓	✓	✓	✓	✓

KEY TO HOTEL NAME ABBREVIATION:

BPH	Brenners Park-Hotel & Spa	HDCER	Hotel du Cap-Eden-Roc	LAN	The Lanesborough
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ER	Eden Rock - St Barths	BP	Le Bristol Paris	JBI	Jumby Bay Island

12.3 Property Actions & Processes

BRENNERS PARK-HOTEL & SPA

- Collaborated on ASA for work security to improve working conditions – ASA is part of 'Engagement Global', a non-profit organisation delivering service for staff development initiatives

EDEN ROCK – ST BARTHS

- Celebrated International Women's Day

HOTEL DU CAP-EDEN-ROC

- Conducted staff expression meetings with Human Resources Manager and General Manager
- In October the hotel was audited by l'Afnor on the equality label.



EDEN ROCK – ST BARTHS. International Women's Day

L'APOGÉE COURCHEVEL

- An expression meeting with employees and General Manager was held

LE BRISTOL PARIS

- Host monthly staff lunches, usually themed by country or specific world events
- Provided motorised trolley for banquet, porter, housekeeping and event teams
- Held a celebratory event for their apprentices who completed their work. During the event, the apprenticeship managers presented their respective apprentices, their career paths and the progress achieved, through emotionally-filled speeches
- 27 staff trainings were conducted throughout Q3, with topics ranging from recycling to fire evacuation
- Held a dinner for employees who have been working at the hotel for 20+ years, held a children of staff party, and gave Christmas gifts to all employees

THE LANESBOROUGH

- The Lanesborough are in the process of replacing chairs in back office to provide for a safer and more comfortable work environment

PALÁCIO TANGARÁ

- Elected the 2018/19 Labor Internal Commission for Preventing Accidents with the participation of 208 team members. The Commission's main objectives are:
 - a. To study the labour environment, the conditions of work, and the risks originated from the operation process
 - b. To analyse and suggest actions to prevent accidents and work diseases
 - c. To develop campaigns regarding labour conditions and health at work

The Internal Commission of Preventing Accidents promoted a series of lectures and activities aimed at raising the awareness of the need to prevent accidents at work, as well as improving the quality of life of employees. The following activities were offered to 80 employees:

- Eye exam
- Food Balance and Lifestyle Equilibrium
- Oral Hygiene
- Safety in the Work Environment
- Theatrical Activity: Healthy Habits
- Body Relaxation: Express Massages
- Twelve students from Paraisópolis, a disadvantaged neighbouring community, studied a professional course at CAMP NGO, and were selected by the Palácio Tangará to complete their 1 and 12 year training in the following departments: Kitchen, Pastry, Housekeeping, Finance, Receiving and Spa.
- On December 20th, Palácio Tangará held their Christmas Celebrations which a majority of team members participated. The event included: Over 50 gifts; special DJ; samba school band; and buffet

12.4 2019 Objectives

2018 Commitment 1 objectives, as set by HR Corporate, were the following:

- Implement a common HR software called Talent Soft to monitor employee data
- Continued compliance with local laws and regulations
- Decrease in employment risks
- No litigation unless we have a very strong court case
- Reinforce team member welfare understanding and assessing the local living conditions
- Lead by our company values. Managers must be exemplary on leading by values.

From 2019, the following objectives have been set to continue striving towards Commitment 1 of Oetker Collection CSR Strategy:

- By 2020 develop a Group Equality Label
- By 2023 ensure implementation of Group Equality Label
- By 2020 ensure SDG Target 5.2. is addressed with Group's outsourced service companies
- By 2025 every hotel should endeavour to employ people with a physical disability into their Back Office
- By 2021 monitor all interview processes for equal opportunities for new applicants via Software Talent, including feedback from applicants
- By 2020 ensure all Oetker Collection employees have access to E-learning platform
- By 2020 ensure there is a system in place to test employees on Oetker Collection Code of Conduct every 3 years

These objectives will be monitored and evaluated annually.



13.0 Commitment 2

Control our consumption and protect our environment



- 2.1. Through innovation reduce our resource consumption.
- 2.2. Understand, protect and restore the biodiversity that surrounds us.
- 2.3. Apply waste regulations and strive to limit any type of pollution.

13.1 Organization Overview

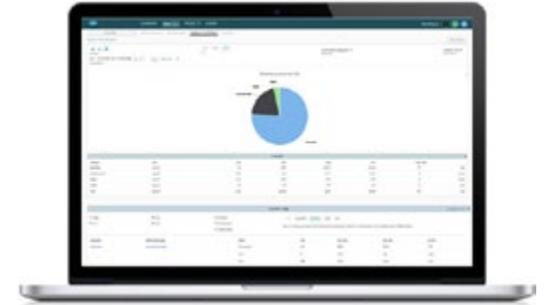
Environmental goals are integrated in the overall Oetker Collection CSR Strategy; therefore the group has not developed a separate environmental policy. Environmental commitments are addressed through Oetker Collection CSR Standards, as all standards directly or indirectly relate to the environment.

Group CSR Team is responsible for the development and implementation of environmental actions at group level with the CEO overseeing its implementation. At property level CSR Patrons, Property CSR Teams, General Managers and Facility Managers are responsible to incentivize and implement environmental initiatives. Also the latter are the first point of contact when employees, guests and suppliers at property level have concerns with regards to hotel or company environmental performance. Group suppliers and partners can contact Group Purchasing Team, Management Team and CSR Team for company environmental enquiries.

OHMC Executive Committee and executive staff are adjourned on all CSR and environmental related activities during the annual Oetker Collection summit. During the summit the group exchanges Oetker Collection overall goals and incentives, which are ultimately aligned to the CSR Strategy.

13.2 Environmental Monitoring

In 2015 Oetker Collection commenced monitoring and evaluating its environmental resource consumption through Con-Serve™ data management system.



To establish Group baseline Group CSR Team worked with Facility Managers to:



FIGURE 6. Establishing Environmental monitoring baseline for Oetker Collection properties

13.2 Environmental Monitoring

Currently, each Oetker Collection property provides consumption data, including electricity, gas, fuel & water into Con-Serve. CSR Patrons, Facility Managers and General Managers are provided with a monthly consumption report to review and improve resource consumption performance. The data is annually analysed to include: identification of year-on-year trends in resource and cost consumption, performance ranking of individual hotels, key electricity, fuel, heat and water statistics, identification of hotspots and best practice, carbon footprint summary and actions points.

Please note that the following calculations exclude Eden Rock – St Barths, which closed at the end of August 2017 due to Hurricane Irma, and remained closed in 2018 with only a small proportion of operations active. Palácio Tangará joined the Collection in June 2017, therefore the % change calculations for this property are based on estimated consumption values for Jan-May 2017.

2018 Group environmental consumption has increased from the previous year as shown in table 7.

TABLE 7. 2018 Group Year-on-Year Summary

METRIC	ELECTRICITY	GAS	WATER	CO ₂	COST
Year on Year % change	-4%	-5%	+5%	-2%	+3%
Per room night change %	-5%	-3%	+5%	-3%	+3%
Change equivalent to	 Over 1.4 million laundry loads	 Heating 62 German homes for a year	 251,755 Average Showers	 Growing 3,013 tree seedlings for 10 years	 56,516 Dr. Oetker Ristorante Pizzas

HOTEL DU CAP-EDEN-ROC



- Hotel has reduced consumption by 38%
- Lowest consumption per room night
- Saved enough electricity to complete almost 2 million laundry loads

LE BRISTOL PARIS



- Hotel has reduced consumption per room night by 13% from previous year
- CPCU (steam) use had been on a gradual decrease since 2014 - a 36% decrease to date
- Saved enough fuel to heat 54 German homes for a year

HOTEL DU CAP-EDEN-ROC



- Hotel has reduced consumption per room night by 10%
- Further opportunity to save as it has 2nd highest consumption per room night
- Saved enough water for 111,931 showers

FIGURE 7. 2018 best practice highlights

13.2 Environmental Monitoring

In 2018, the Oetker Collection's electricity use has reduced by 4%, and per room night consumption has reduced by 5% compared to 2017. Simultaneously, fuel/heat use has reduced by 5%, and per room night consumption has reduced by 6%. Conversely, however, the Collection's total and per room night water consumption has increased by 5%.

The annual analysis includes identification of best practice for each property. Highlights in 2018 are demonstrated in Figure 7.

Hotspot analysis was completed to highlight areas for improvement in each property. For example, as shown in Figure 8, electricity consumption at one of the properties remained constant across the whole year with no adjustment to seasons or occupancy levels. Specifically, in September there was a significant drop in occupancy, however, consumption remained the same. Ensuring adjustment of electricity use to such variables could result in savings in both consumption and costs.

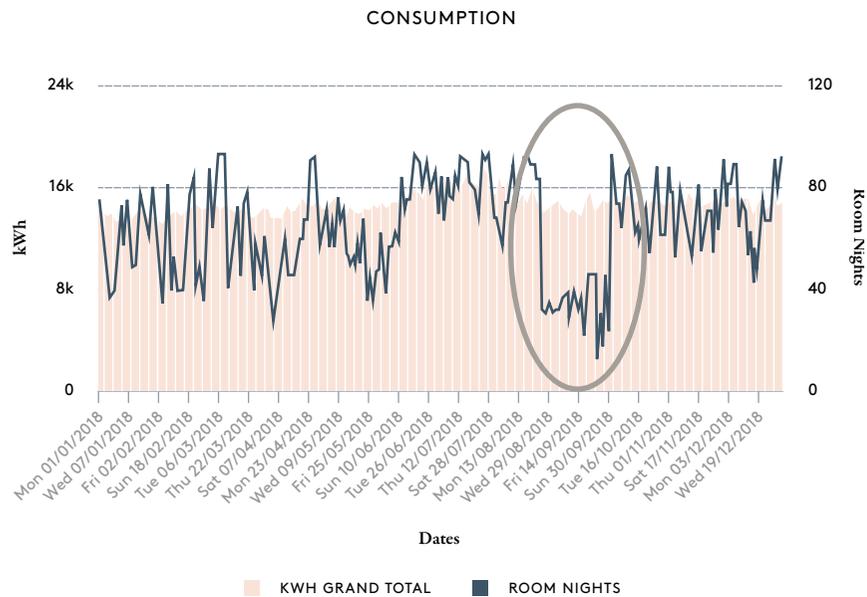


FIGURE 8. Property electricity consumption with room nights overlay.

At another property, a broken water pipe led to a peak in water consumption. While consumption on that day was 7 times higher than usual, a repair on the same day prevented any further waste of water.

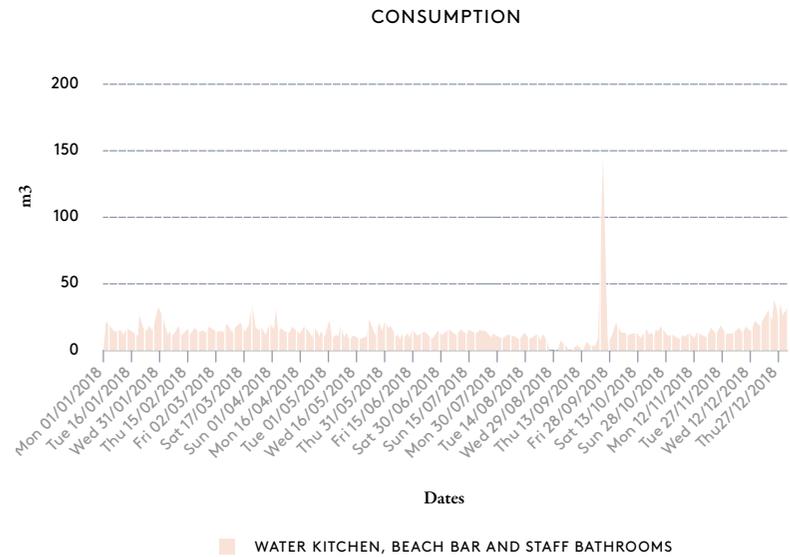


FIGURE 9. Property water consumption

13.2 Environmental Monitoring

Taking into account electricity consumption and fuel/heat use, the Oetker Collection's carbon footprint in 2018 was 9,209 tCO₂e. The GHG Protocol Corporate Standard requires the separation of emissions into Scopes. Scope 2 emissions, which pertain to indirect emissions from the generation of purchased electricity, account for 70% of the Oetker Collection's emissions. Scope 1 emissions account for 30% and are direct emissions from burning fuel/heat on site. Due to reductions in energy consumption, the Oetker Collection's total CO₂ emissions in 2018 have reduced by 2%; equivalent to a per room night emissions reduction of 2.5%.

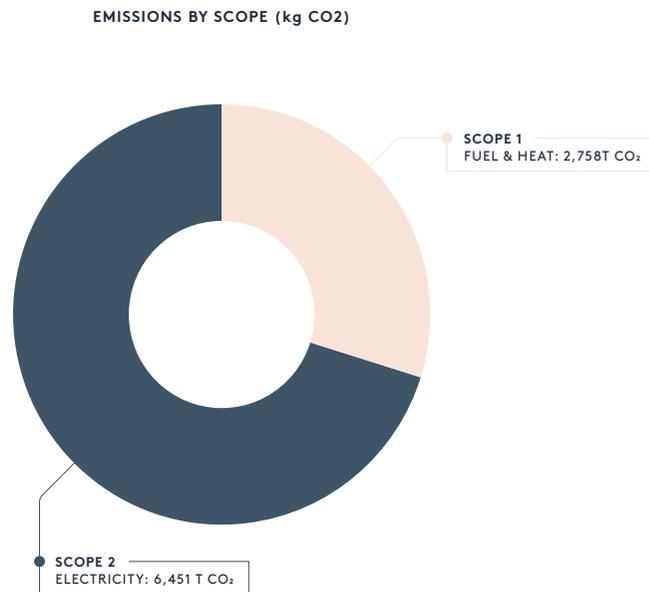


FIGURE 10. Oetker Collection 2018 carbon emissions according to Scope 1 and 2

Following from the results all CSR Patrons were provided with an Operational Checklist on resource use best practice. Also, to improve resource consumption, Facility Managers, CSR Patrons and Group CSR Team committed to further engage with monthly Con-Serve™ reports.

Although overall performance has declined, each individual hotel has completed positive environmental actions.

TABLE 8. Environmental initiatives in each property

ACTIONS/PROJECTS /INITIATIVES	BPH	CSM	ER	HDCER	AC	BP	LAN	PT	JBI
Investment in resource efficient technology		✓	✓	✓	✓	✓	✓	✓	✓
Smart metering system		✓		✓	✓	✓	✓	✓	
Conservation & Biodiversity	✓	✓	✓	✓	✓	✓	✓	✓	✓
External Auditing	✓	✓		✓	✓	✓		✓	
Food Waste		✓	✓	✓	✓	✓	✓	✓	
Sourced new sustainable products	✓	✓	✓	✓	✓	✓	✓	✓	✓

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ER	Eden Rock - St Barths	BP	Le Bristol Paris	JBI	Jumby Bay Island

13.2 Environmental Monitoring

BRENNERS PARK-HOTEL & SPA

- All employees have been informed on the different ways of recycling waste via Daily Commitment.
- Have started a 'saving light' program in all back-of-house areas.

CHÂTEAU SAINT-MARTIN & SPA

- 70% of cleaning products in the hotel are eco-labelled.
- The hotel achieved 65% plastic waste reduction per room night from July to August 2018.

EDEN ROCK – ST BARTHS

- Joined for the first time INE Association (Island Nature St Barth Experience) in order to plant local mangrove trees near the hotel.
- Straws have been eliminated.

HOTEL DU CAP-EDEN-ROC

- Created a database to collect employee's mobility information. This will assist with developing methods e.g. car-share to improve staff's trip to work and reducing carbon emissions.
- Hosted an event for employees themed around carpooling.
- Developed an action plan with F&B departments and cleaning product suppliers to increase eco-labelled cleaning products.

L'APOGEE COURCHEVEL

- Installed LED lighting in parking area, staff stairs and housekeeping back office.
- Use glass cups staff canteen, and plastic glass covers in rooms were replaced with paper covers.



13.2 Environmental Monitoring

LE BRISTOL PARIS

- Installed an insect hotel.
- Large decreases in electricity and gas consumption:
 - Installed aqua cleaning machine for laundry
 - Installed new gas pumps and more efficient regulators
- Established new recycling contract with 'Green Wishes'.
- The hotel is trialing bins with dividers to separate recyclables in both guest rooms and back office.



THE LANESBOROUGH

- Turning torches in the façade off from 5am.
- Set-up an Energy Committee to address consumption.
- With the help of Con-Serve™ identified & repaired two water leaks and reduced any further wastage.
- Started treating used ground coffee waste as organic waste. The used coffee will be sent to a farm in Surrey to help grow vegetables instead of being burned in energy recovery plants.
- The hotel is investigating options for making use of rain water.



PALÁCIO TANGARÁ

- Changed the temperature from 22° C to 24° C in the vacant rooms during fall and winter seasons.
- Meeting rooms and events spaces' air-conditioning system was adjusted such that air flow is now variable; with no airflow to empty rooms and only keeping the necessary flow for the rooms that are being used, thus saving energy.
- All used oil in the kitchen is sold to an oil recycling company, and the values obtained from this sale are destined to the team member end of the year party.
- In "Pitanga", the staff cafeteria, the Chef started a new initiative of Meat Free Mondays. The initiative has been greatly appreciated by staff
- Elimination of the following plastic items:
 - 100% of straws in the F&B outlets
 - 100% of Plastic Cups in the Pitanga (Staff Cafeteria)
 - 100% Cocktail stirrers
 - 100% Plastic Q-tips/ Cotton swabs
 - 75% of plastic water bottle was eliminated, with only pool areas now using plastic.

JUMBY BAY ISLAND

- The Hawksbill Turtle Project is now in place

13.3 2019 Objectives

2018 environmental objectives included the following:

- A** Reduce electricity, water, fuel and heat consumption.
- B** Complete all of the 2017 & 2018 CSR Standards by the end of 2018.
- C** Create an internal Green Champion Award system.

From 2019 The following objectives have been set to continue striving towards Commitment 2 of Oetker Collection CSR Strategy:

- A** By 2024 reduce absolute energy consumption by 10% (at group level)
- B** By 2024 reduce absolute water consumption by 10% (at group level)
- C** By 2021 each property to commit to the protection of 1 species within their surrounding area
- D** By 2020 each property to ensure their operation is not negatively impacting surrounding biodiversity
- E** By 2024 reduce absolute solid waste by 10% (at group level)
- F** By 2023 reuse or upcycle 5 solid waste items (in each property)
- G** By 2024 increase recycling rate by 10% at group level from 2018 performance
- H** By 2020 ensure all properties use organic fertilizers and pesticides
- I** By 2024 Increase use of eco-friendly cleaning products by 10% in each property
- J** By 2020 ensure all properties are using best available technology to reduce building emissions in line with national legislative requirements
- K** By 2020 all properties to provide fleet of sustainable vehicles for guest use
- L** By 2020 ensure all properties are instructed to buy in bulk to reduce transport and packaging
- M** Increase transparency of our supply chain by 50% and work closely with all our suppliers to drive sustainable businesses

14.0 Commitment 3

Guarantee a service of an exceptional and sustainable quality increasing the awareness of our guests and our staff on social responsibility



- 3.1. Guarantee an impeccable and responsible service through fair operating practices.
- 3.2. Encourage our guests and staff to contribute to our vision of a sustainable future.

14.1 Quality & Fair Operating Practices

Quality is a top priority in Oetker Collection Masterpiece hotels, the group adheres to the 'Leading Quality Assurance' (LQA) system. Each hotel undergoes two annual audits by a mysterious guest. Head of departments are then provided with internal tests and action plans tracked throughout the year to ensure compliance. LQA global branding ranking for 2018 (Figure 11) demonstrates Oetker Collection continuous commitment to guaranteeing an impeccable and responsible service.



FIGURE 11. Oetker Collection 2018 LQA Global Brand Ranking

The Oetker Group developed a Compliance Management System in line with the group's fair operating practices and increasing legal requirements. Within this system's framework, a Compliance Organization was established whose Compliance Representatives are available as neutral and independent contact persons for any questions in relation to the topic of compliance. If there is any indication of a (potential) violation of the law in relation to the Oetker Collection, the participant has the possibility to send the Compliance Representatives – completely anonymously – a message via the Compliance Hotline System (<https://www.oetkercollection.com/compliance/>).

14.1 Quality & Fair Operating Practices

Also, each hotel has a Compliance Coordinator who reports to the Group Coordinator (Dr Timo Grünert, CFO of Oetker Collection). Managing Directors and Compliance Coordinator are responsible and accountable for the implementation of anti-corruption.

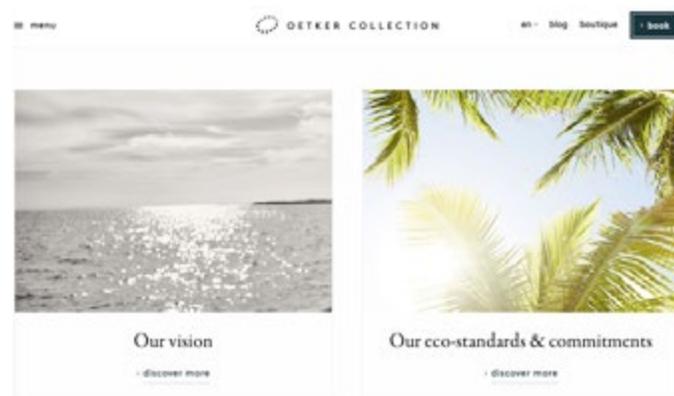
The Group's Code of Conduct includes commitments to comply with relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes. The Code of Conduct also, provides a formal policy of zero-tolerance of corruption.

The Oetker Collection's Audit Team conducts internal audits of every company within the Group to assess potential areas of corruption. Following from internal audits the company evaluates its anti-corruption performance through actions plans and regular meetings at Group Coordinator level.

14.2 Guest & Staff Communication

As stated in Commitment 3.2 Oetker Collection aims to transmit its CSR vision and values to all of its stakeholders, to ultimately have a greater impact. It achieves Commitment 3.2. through CSR communication and activities.

All CSR processes and initiatives are communicated to staff and guest through a variety of methods, including:



WEBSITE:

In 2017 Oetker Collection website was revamped with the addition of a CSR page. Staff and guests can visit and learn about existing programs on the website.

SOCIAL MEDIA:

Individual property CSR teams use a range of social media tools to promote their CSR activities, including Instagram Facebook, and LinkedIn. 2018 highlights include:

- 608 views of The World Charity Day Group Instagram post.
- 8 press releases mentioning The Oetker Plastic Ban.
- New internal social media platform called PearlNet (Workplace by Facebook) established for all Oetker Collection staff. Within the platform there are various CSR groups which enable all the CSR Teams to communicate with each other, showcase their projects, and submit group-wide CSR postings to all employees in the group: – 134 posts with 3721 likes on PearlNet in 6 months.



Robb Report USA: Another great article highlighting how Oetker Collection is leading on en... See more



14.2 Guest & Staff Communication

WORKSHOPS:

Since 2015, 6 properties conducted workshops to develop an on-site CSR Team and learn about Oetker Collection CSR Strategy.

PRESENTATIONS:

Group CSR Team provides an overview of Oetker Collection CSR strategy and progress during the annual group summit. Operations and management staff attend the event. The CSR Team's attendance and presentation is to ensure sustainability remains a top priority within the company overall.

- Property level CSR meetings: In 2018, CSR meetings took place monthly in 8 out of 9 of the Oetker Collection properties
- Daily Commitments & Bulletin Boards: at site level, CSR material is included in the Daily Commitments and can be viewed on staff bulletin boards.

While guest and staff communication remain a priority, the Oetker Collection has also taken the opportunity to publicly advocate the importance of action in relation to CSR. For example, in 2018, the Group issued press releases on their Plastic Ban and Earth Hour initiatives which promote progress towards SDG 12 and 13 respectively. Going forward, from 2019, we will endeavour to publish two press releases per year on CSR topics, two blogs per month on the new Eden Being Blog, as well as one topic per quarter in the newsletter which goes out to trade. The Group's CEO also plans to include more CSR messages in his personal social media profile. Furthermore, Director of Group CSR Team has represented OC CSR commitments/ activities at events including The Austrian World Summit in 2018 - www.austrianworldsummit.com, a key climate conference held annually in Vienna in collaboration with R20 regions for climate change and with the support of the UN. Going forward we plan for other company leaders, including the CEO, to promote CSR and associated UN Goals by participating in key events.

14.3 Staff Activities

GREEN PEARL AWARD

In 2017, Group CSR Team established an award system for individual property CSR Teams. The award is provided to the CSR team who best performs in fulfilling Oetker Collection CSR Commitments and 19 CSR Standards. The 2018 winner was announced during the 2019 Leadership Summit, and was team Bee Green at Le Bristol, Paris.



THE LANESBOROUGH

- The 2017 winner for the internal Green Pearl Award was the Kitchen Team for their implementation of the Food Waste bins. Will be planting a fruit tree in their honour through "Trees for Cities" which supports programs for schools for children to learn about where their food comes from.
- Organised staff menu themed around Sustainable Gastronomy Day.

14.3 Staff Activities

BRENNERS PARK-HOTEL & SPA

- Staff harvested 200kg apples from the property orchard to make organic juice for the breakfast buffet.



L'APOGÉE COURCHEVEL

Organised 2 CSR Staff Quizzes.

PALÁCIO TANGARÁ

- Recruited a new team member in to the Bluebirds CSR team.

LE BRISTOL PARIS

- Developed two posters for staff concerning: blood donations and coral reef effects by sunscreen.

EDEN ROCK – ST BARTHS

- 'Run for a Cleaner World' – staff participated in the first Run Eco Team in St Barthelemy. The aim of the Run Eco Team Association is to preserve local environment simply by running and picking up trash at the same time.
- Organised cleaning around the rock on Environment Day – the Maintenance team found beds and fences in the water.
- Eden Angels took part in the cleaning of the Coral facing the Rock.
- Eden Angels participated in 2018 World Clean Up Day collecting more than 3 tons of trash from cans, cigarette stubs, white goods. Around 60 locals participated in the event.



14.4 Guest Activities

BRENNERS PARK-HOTEL & SPA

- New experiences for guests: Tweezy experience with electric cars and e-bikes for bike tours.
- Guests were able to purchase the honey derived from bee hives in Brenner's garden.



CHÂTEAU SAINT-MARTIN & SPA

- Created a new infusion with local products and aromatic herbs. The infusion is showcased in restaurant, bar and Spa for guests.
- Guest participated with staff to discover hotel CSR efforts to protect bees with beekeeper.

LE BRISTOL PARIS

- Offer green transport options for guests including 4 electric bicycles, BMWi Loads, limousine services available by hybrid car.

THE LANESBOROUGH

- Giving bag: The contents are place straight away in a charity bag and when it is full the bag is taken straight away to a local charity shop.



JUMBY BAY ISLAND

- Organised home owners private Farmtable dinner to promote Island's vegetable garden.

14.4 Guest Activities

HOTEL DU CAP-EDEN-ROC

- The CSR team is working with the Kids Club to create sustainable activities for guest children. In partnership with “L’Espace Mer & Littoral” and the association “Pour une planète bleue”, they will design activities focusing on the protection marine biodiversity and Mediterranean turtle.
- A Kids Club workshop inviting kids to recognise plants in their cocktails: children went into the gardens to identify aromatic plants, which they used to create cocktails at the juice bar.
- Provided turtle bracelets for guest who adopted Eden cuddly toy last year. The bracelet is supplied by ‘Gift for Change’, which offers sustainable eco-conceived promotional items that support an environmental cause. 1 item bought = 1 tree planted/ 1 coral restored/ 100 bees supported. Each item is associated to a unique “solidarity code” that allows the receiver to geo-locate the project supported and discover all details about the campaign.



14.5 2019 Objectives

Group quality and fair operating practices are continuously evaluated and improved through property internal objectives determined by the LQA process. Also, as depicted, each property offers many staff and guest CSR activities. For 2018, Group CSR Team developed its first group level guest & staff CSR activity for Earth Hour. The aim was to create greater CSR synergies between all Oetker Collection Masterpiece Hotels and to establish these kind of events as fixed part of operations and integral to the group’s communication activities.

Earth Hour 2018 was celebrated in all Oetker Collection hotels, each with special candle light events to mark the hour. Images were shared on all Social Media Channels and got a total of 23.198 views.



14.5 2019 Objectives

From 2019, the following objectives have been set to continue striving towards Commitment 3 of Oetker Collection CSR Strategy

- Ensure all hotels have an operational CSR Team
- Ensure all new employees are introduced to Group CSR
- Ensure all CSR standards are fully implemented by 2024
- Create online CSR training modules by 2024
- By 2020 integrate 5 CSR questions in the annual employee survey
- Annually develop at least one guest CSR experience per property
- Annually develop two CSR staff event per property
- Annually update CSR content on website
- By 2022 achieve Advanced Level of UN Communication on Progress & align to GRI Core option
- Conduct quarterly update on CSR topics for PR usage
- Create CSR Photo Library for Oetker Collection
- Increase CSR social media posts for all properties on a bi-monthly basis by 2021
- By 2020 develop a Social Media Strategy in line with CH Social Media Planner for PearlNet posts



15.0 Commitment 4

Take part in the social, cultural and economic development of the regions in which we operate



- 4.1. Favour local producers who are a guarantee of the rich heritage of our region.
- 4.2. Commit alongside our partners in sustainable projects that are linked to the values we defend.

15.1 Sustainable Purchasing

Oetker Collection supply chain is dependent on hotel and customers requirements as shown in figure 12. Oetker Collection main groups of purchase include: beverage, food, cleaning supplies, guest supplies, operating equipment and others (IT, printing...). Within each group of purchases, specific agreements are negotiated to allow hotels to benefit from specific pricing conditions.

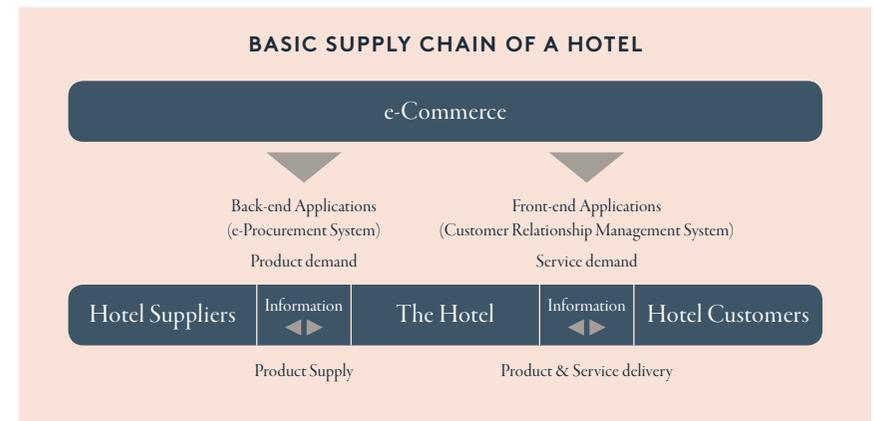


FIGURE 12. Oetker Collection supply chain

From 2016, 50 Oetker Collection vendors have been selected. The selection process remains the same. Each supplier is selected regarding the following main criteria:

- Price/quality offer
- CSR compliance (location, products traceability, involvement in environmental issues...)
- Ability to react as soon as possible to group's requests.

CSR compliance is screened following the process below:

1. Group Purchasing Team or any stakeholder raises to the attention of the Group CSR Team to investigate on a specific supplier;
2. Group CSR Team researches and requests for documentation including certifications, reports on topic of scrutiny;
3. Supplier provides requested evidence;
4. Purchasing Team and CSR Team make an informed decision on whether to work with supplier.

15.1 Sustainable Purchasing

Further to CSR screening, OC CSR Team has prepared a Responsible Purchasing Charter to support Oetker Collection hotels with sustainable purchasing choices. It is important for Oetker Collection suppliers to be aware of Oetker Collection CSR Strategy, as suppliers are an extension of the group.

The Responsible Purchasing Charter is available for all suppliers in English, French, German and Portuguese. Further distribution and awareness is provided by Oetker Collection Purchasing team who:

- Shares with suppliers' relevant documents such as Responsible Purchasing Charter
- Organises trainings in Oetker Collection Hotels with preferred vendors. For example Diversey hosted training about cleaning products' consumption and organic components.

A questionnaire was developed in 2017 to ensure suppliers were aware of Oetker Collection CSR Strategy and to monitor supplier's sustainability performance. In 2017, the response rate to the questionnaire was very limited as the questionnaire was only sent to 30 Oetker Collection vendors; thus, in 2018, it was also sent to individual hotel suppliers. In 2018, a total of 218 suppliers completed the questionnaire, demonstrating a response rate of 37%. 16.1% of the respondents supply the entire Oetker Group, with the remainder supplying individual Oetker Collection properties. The geographic distribution of respondents in 2018 was as follows:

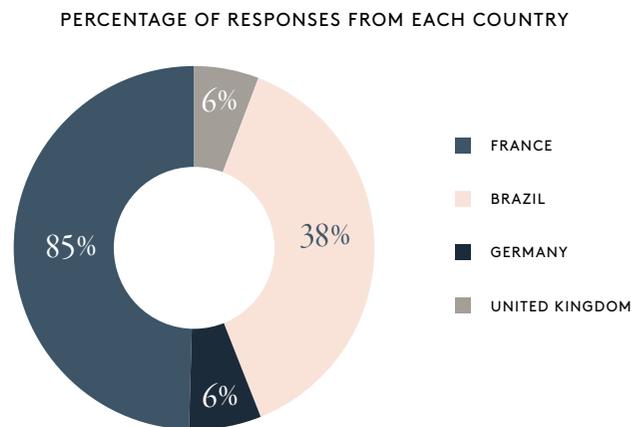


FIGURE 13. Geographic distribution of Supplier Questionnaire responses

By 2020, there needs to be a more even distribution of supplier responses per country. OC CSR Team will be supplied with the number of suppliers in each country so that this can be compared to the number of responses received.

The Responsible Purchasing Supplier Questionnaire includes an analysis of suppliers' locality, sustainability documentation/certification, anti-bribery & discrimination stance and environmental performance.

The Group believes in favouring producers that operate locally. 60% of suppliers source their materials and/or employees locally and, therefore, support the development of the local region (defined as a 200km radius).

When asked how they do this, common responses were;

- We purchase from local suppliers
- We sponsor local sports clubs and/or schools
- We donate to local projects/charities
- We recruit local labour
- We donate food
- We collaborate with local electricity producers
- We partner with local companies
- We support local artisans

15.1 Sustainable Purchasing

Group CSR Team also screened suppliers' sustainability performance in terms of documentation and certifications. The aim was to understand how many suppliers have sustainability partnerships and/or certifications, demonstrate significant sustainability results, and/or produce reports and charters. The results were as follows:

- 12% of suppliers have sustainability related reports/charters, including Corporate Social Responsibility, Sustainable Development, Purchasing, Ethical Company, Internal, and Environmental Assessment reports.
- 26% of suppliers form partnerships to foster sustainability. These include; Clean the World, Paper for Food, Fair Wair Foundation, and partnerships with recycling/waste management organisations.
- 32% of suppliers have sustainability certifications. The most common being Ecocert, BRC, ISO 14001, ISO 9001, Ecolabel, HVE, and Rainforest Alliance.
- 17% of suppliers experienced significant results, such as securing funding for disabled workers, reduction in water consumption and CO2 emissions, improved productivity, reduced plastic waste, increase in solar energy, and participation in reforestation projects
- 28% of suppliers place other sustainability issues at the forefront of their operations. These include; adhering to palm oil policies, donations to food banks, paperless invoicing, electric vehicles, recycling awareness training, and implementing a returnable green crate system.
- 28% of suppliers place other sustainability issues at the forefront of their operations. These include; adhering to palm oil policies, donations to food banks, paperless invoicing, electric vehicles, recycling awareness training, and implementing a returnable green crate system.

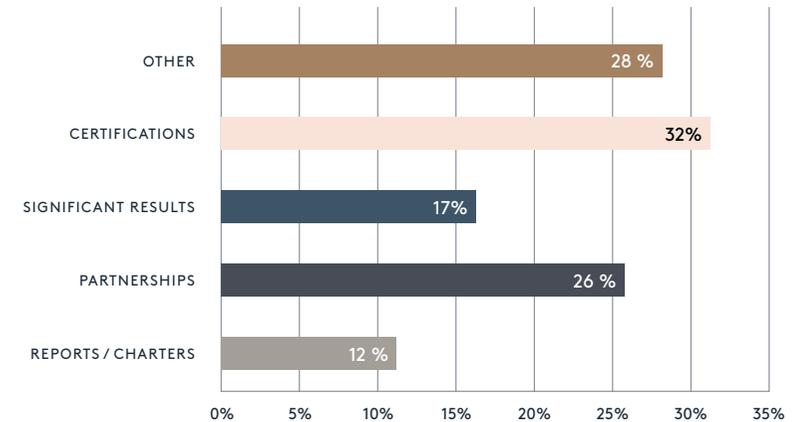


FIGURE 14. Oetker Collection Supplier's sustainability performance

Going forward, the Purchasing Team will continue to collect and update supplier information to increase the transparency of the supply chain. Suppliers will be asked to make their sustainability reports and/or supporting information available to the Purchasing Team.

15.1 Sustainable Purchasing

Suppliers are not obliged to undertake a sustainability activity in terms of partnerships, certification and/or reports & charters, as each supplier has different resources. However, the stated items can assist Oetker Collection to monitor supplier's sustainability performance.

Group CSR Team reviewed supplier's awareness of Oetker Collection Responsible Purchasing Charter and Oetker Code of Conduct, with the following outcomes in 2018:

- 56% of suppliers have a non-discrimination policy in place.
- 47% of suppliers are aware of the Oetker Collections Anti-Bribery Policy.
- 42% of suppliers have an Anti-Bribery Program including company handbooks, employee monitoring, control of business relationships, ethical codes of conduct, training and orientation, and zero tolerance policies.

Following from the results Oetker Collection needs to ensure 100% of suppliers are aware of Oetker Collection Responsible Purchasing Charter and Oetker Code of Conduct by 2020.

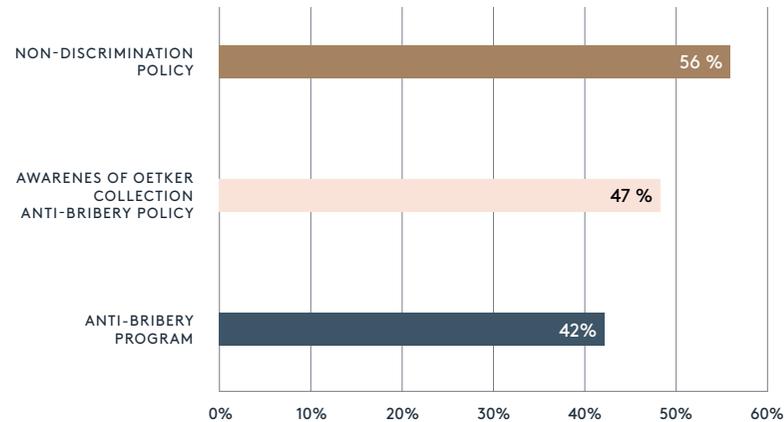


FIGURE 15. Oetker Collection supplier's awareness

Lastly the Group CSR Team screened suppliers' environmental initiatives with the following outputs in 2018:

- Suppliers were most concerned with recycling and/or reducing paper use, recycling and/or reusing waste, water savings, and energy savings.
- Suppliers were least concerned with producing environmentally friendly eco-labelled cosmetic and maintenance products and using soft mobility vehicles for deliveries.
- 6% of suppliers were concerned with other environmental initiatives including food composting and donation, using organic cleaning products, organic/sustainable farming, animal welfare, using rain water for irrigation, and supporting reforestation projects.

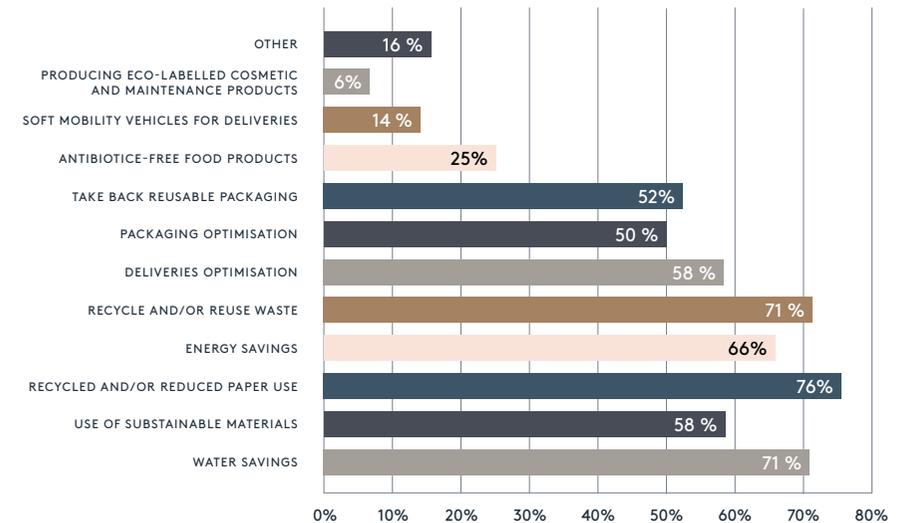


FIGURE 16. Oetker Collection Suppliers' Environmental Initiatives

Following from environmental initiatives results, new categories will be included in the 2019 questionnaire to emphasise the socio-economic aspect of sustainability. Moving forward, properties are also encouraged to buy in bulk to reduce transport and packaging.

15.2 Charities & Donations

Oetker Collection coordinates its efforts with other organizations and initiatives to amplify and not negate or unnecessarily duplicate – efforts of other contributors. In 2018, 9 Oetker Collection properties have raised a total of €60,103 and have worked with 19 different charities.

BRENNERS PARK-HOTEL & SPA

- Donated blankets, sheets, and towels to the local animal shelter.
- Donated lost & found, giving bags and old staff clothes to the German Red Cross.

CHÂTEAU SAINT-MARTIN & SPA

- Since 2017, Château Saint-Martin & Spa has protected an emblematic bird of its park and regional biodiversity - the owl “Chevêche” in partnership with the local association “Bird Protection League” in Vence. The hotel provides a stuffed toy owl available for adoption in clients’ rooms. All the profits of the action are given to the association. In 2018, 163 owls were adopted, and the hotel donated 5167€ to the association.



LE BRISTOL PARIS

- Organised a free of charge cocktail presentation for the ‘Petit Prince’ association
- Offered 5 galettes for ‘La galette du Coeur’ an annual human action
- Hosted The “Gala de l’Espoir” to raise funds for “La Ligue contre le cancer”, cancer research foundation, which is celebrating its 100th anniversary
- Charity dinner at Le Bristol for Saint Barthelemy. Almost 1000 Euros were raised during a Quiz organised by the Lions Club. The aim of the event was to raise funds in order to help the local community in Saint Barths who lost their home during Irma Hurricane.

L’APOGÉE COURCHEVEL

- Collected 8,879€ for the Vanoise National Park
- Works with the Red Cross, Clean the World and Vanoise National Park

EDEN ROCK – ST BARTHS

- Organised quiz for Handicap Awareness Week and raised €400 for the cause
- Les ‘Eden Angels’ participated on a cleaning day organised by Lions Club and Rotary Club. Cans, caps, cigarette stubs, white goods, gutters, motors in other words, more than 10.5 tons of trash were collected.
- Planted trees with the Island Nature St Barth Experience Association.
- Staff participated in the GustaviaLoppet to celebrate friendship between Sweden and St Barths and to celebrate St Barths Heritage.
- Sponsors of the St Barths Cata Cup.
- The Eden Angels participated in a local action with Island Nature St. Barth Experience to create a boardwalk with mangrove, benefitting both the inhabitants and the marine wildlife.
- Raised funds for The Téléthon, a French fund-raising event taking place every year with the help of thousands of volunteers, millions of participants and many artists
- The Eden Rock team gathered to organise a special festive workshop to hand write more than 400 greeting cards for guest friends.
- Organised local street artist Alfredus to paint the 90 m2 beach wall in front of Eden Rock.

HOTEL DU CAP-EDEN-ROC

- Red Cross Charity Gala in June at Hotel du Cap-Eden-Roc with a financial donation record this year.
- Organised a raffle donation for “Lenval Hospital”, a hospital for children in Nice by offering a lunch for 2 people at the hotel.



15.2 Charities & Donations

THE LANESBOROUGH

- Supported the British Red Cross with donations of clothes.

JUMBY BAY ISLAND

- Raised funds for Barbuda with concert of White Cliff Jean.
- Organised Kanneh Mason concert to raise funds for the setting up of the Antigua & Barbuda Youth Symphony Orchestra.
- The main road in Antigua which leads to Jumby Bay private security, parking and boat was in a terrible state from the winds and filled with trash. A group of Jumby associates went to the main land for an organized clean up. The team covered 150 yards and collected 20 bags with 20 lbs in each so approximately 400 lbs of garbage. It was a wonderful initiative for Jumby associates and for the island of Antigua.



PALÁCIO TANGARÁ

- Palácio Tangará hosted a charitable event in June in order to generate funds for the local Community Paraisópolis, a favela located close to the hotel. The hotel involved several Brazilian holdings from the financial sector such as Bradesco, Itaú, Banco do Brasil and many others from other industries such as Coca Cola, Sodexo, Eletropaulo, Carrefour, Pão de Açucar, Miolo, Salton, Objetivo School amongst others to participate in this effort.
- Palácio Tangará contributed generously with the Events space (Cristal Ballroom) waiving the daily fee of USD25k; as well as with the culinary manpower to produce the delicacies served and the full service staff.
- Burlebirds team helped the Children's Cancer Support House by collecting more than 82 kilos of powdered milk. They had the opportunity to deliver the donation, which allowed them to get to learn more about the work done by the NGO. In addition the team was able to interact with the children who stay there. These children come from all over Brazil for their cancer treatments.
- Involved with CAMP, a Non-Governmental Organization that acts as a vocational school for training in various areas in the hotel industry, Associação Paraisópolis, and Associação Maria Helen Drexel.
- Hosted a Charitable event to generate funds for the local community Paraisópolis, the nearest in distance to the hotel. The objective was to raise those funds in view of the foundation of a Community bank and involved several Brazilian holdings from the financial sector and other industries.
- The team members of the Palácio Tangará have chosen the Associação Maria Helen Drexel, a NGO that takes care of 38 children and teenagers who have suffered some kind of abuse, psychological or physical. Palácio Tangará ensured that each of them received a Christmas package containing clothes, shoes, toys and/or a special gift (books, school materials etc.).



15.3 2019 Objectives

The 2018 Sustainable Purchasing 2018 actions included the following:

- A** By 2019 all 50 Oetker Collection vendors need to be provided with the Responsible Purchasing Supplier Questionnaire.
- B** By 2019 individual hotel suppliers who present the greatest expenditure on hotel's costs will be provided with the Responsible Purchasing Supplier Questionnaire.
- C** By 2019 the response rate needs to increase to 50%.
- D** Oetker Collection Properties need to increase number of local suppliers to 30% by 2019.
- E** Group needs to ensure 100% of suppliers are aware of Oetker Collection Responsible Purchasing Charter by 2019.
- F** In 2018 share results with suppliers and all OC Hotels for best practice and awareness.
- G** Include new environmental initiative in 2019 Questionnaire.

From 2019, the following objectives have been set to continue striving towards Commitment 4 of Oetker Collection CSR Strategy:

- A** By 2022 foster 3 relationships with local and artisanal enterprises at each hotel.
- B** By 2021 establish a system to ensure partner collaborations at property level are guided by at least one of our principles.
- C** By 2021 every property to engage in at least two projects where every staff member can participate in.



Grâce à
GROUPE OETKER
rien ne se perd, tout se transforme !



Du 1^{er} janvier au 31 décembre 2018,
165 kg de capsules ont été collectées
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Que deviennent vos capsules ?

<p>MARC DE CAFÉ valorisé (kg) 151</p>  Serre à fleurs  Biogaz  Compost	<p>ALUMINIUM recyclé (kg) 6,9</p>  3 vélos <p>Ce qui correspond à</p>  461 canettes de 33cl
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Le recyclage de vos capsules **Nespresso**
a permis d'économiser **16,5 kg** de CO₂.
Ce qui correspond à 1,2 trajets en voiture Paris – Orléans.

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16.0 Moving Forward

The report provides an overview of Oetker Collection CSR status. Having an understanding of the Group CSR position assists with determining the direction for 2019 and future developments.

2019 Objectives to be achieved by Oetker Collection CSR Team, HR Team, Purchasing Team and CSR Patrons are more specific, and include:

COMMITMENT 1: RESPECT HUMAN RIGHTS

- 1 By 2020 develop a Group Equality Label
- 2 By 2023 ensure implementation of Group Equality Label
- 3 By 2020 ensure SDG Target 5.2. is addressed with Group's outsourced service companies
- 4 By 2025 every hotel should endeavour to employ people with a physical disability into their Back Office
- 5 By 2021 monitor all interview processes for equal opportunities for new applicants via Software Talent, including feedback from applicants
- 6 By 2020 ensure all Oetker Collection employees have access to E-learning platform
- 7 By 2020 ensure there is a system in place to test employees on Oetker Collection Code of Conduct every 3 years



COMMITMENT 2: CONSUME RESPONSIBLY

- 8 By 2024 reduce absolute energy consumption by 10% (at group level)
- 9 By 2024 reduce absolute water consumption by 10% (at group level)
- 10 By 2021 each property to commit to the protection of 1 specie within their surrounding area
- 11 By 2020 each property to ensure their operation is not negatively impacting surrounding biodiversity
- 12 By 2024 reduce absolute solid waste by 10% (at group level)
- 13 By 2023 reuse or upcycle 5 solid waste items (in each property)
- 14 By 2024 increase recycling rate by 10% at group level from 2018 performance
- 15 By 2020 ensure all properties use organic fertilizers and pesticides
- 16 By 2024 increase use of eco-friendly cleaning products by 10% in each property
- 17 By 2020 ensure all properties are using best available technology to reduce building emissions in line with national legislative requirements
- 18 By 2020 all properties to provide fleet of sustainable vehicles for guest use
- 19 By 2020 ensure all properties are instructed to buy in bulk to reduce transport and packaging
- 20 Increase transparency of our supply chain by 50% and work closely with all our suppliers to drive sustainable businesses



16.0 Moving Forward

COMMITMENT 3: ENSURE ENVIRONMENTAL AWARENESS

- 21 Ensure all hotels have an operational CSR Team
- 22 Ensure all new employees are introduced to Group CSR
- 23 Ensure all CSR standards are fully implemented by 2024
- 24 Create online CSR training modules by 2024
- 25 By 2020 integrate 5 CSR questions in the annual employee survey
- 26 Annually develop at least one guest CSR experience per property
- 27 Annually develop two CSR staff event per property
- 28 Annually update CSR content on website
- 29 By 2022 achieve Advanced Level of UN Communication on Progress & align to GRI Core option
- 30 Conduct quarterly update on CSR topics for PR usage
- 31 Create CSR Photo Library for Oetker Collection
- 32 Increase CSR social media posts for all properties on a bi-monthly basis by 2021
- 33 By 2020 develop a Social Media Strategy in line with group Social Media Planner for PearlNet posts



COMMITMENT 4: ENGAGE WITH SUSTAINABLE COMMUNITIES

- 34 By 2022 foster 3 relationships with local and artisanal enterprises at each hotel (starting 2019)
- 35 By 2021 establish a system to ensure partner collaborations at property level are guided by at least one of our principles
- 36 By 2021 every property to engage in at least two projects where every staff member can participate in



17.0 GRI Index

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE/REPORT LOCATION	PAGE
102 - 1	Name of the organization	Oetker Collection	3
102 - 2	Activities, brands, products, and services	Oetker Collection is a hotel collection of 9 masterpiece hotels worldwide. The organization manages and operates the high-end luxury hotels. Each hotel is unique one-of-a-kind, a brand by itself.	3, 7
102 - 3	Location of headquarters	Lichtentaler Strasse 92, Baden-Baden, 76530	3
102 - 4	Location of operations	Germany, France, Great Britain, St Barthelemy, Antigua, Brazil	3
102 - 5	Ownership and legal form	Oetker Collection is managed by the German company Oetker Hotel Management Company GmbH (OHMC).	3
102 - 6	Markets served	<ul style="list-style-type: none"> a. Markets served, including: <ul style="list-style-type: none"> i. Baden-Baden (Germany), Paris (France), Antibes (France), Vence (France), Courchevel (France), London (Great Britain), Sao Paulo (Brazil), St Barthelemy (France), Antigua (private island) ii. Tourism industry - hospitality iii. Individuals from worldwide markets 	3
102 - 7	Scale of the organization	<ul style="list-style-type: none"> a. Scale of the organization, including: <ul style="list-style-type: none"> i. 2250 employees across the Collection ii. Management Company + 9 hotels iii. Total business volume of the Collection: 286M€ v. Hotels: around 155.000 room nights per year 	3
102 - 8	Information on employees and other workers	Refer to Section 12.1 Organization Overview	22
102 - 9	Supply chain	Refer to Section 15.1 Sustainable Purchasing	44
102 - 10	Significant changes to the organization and its supply chain	<ul style="list-style-type: none"> a. Significant changes to the organization's size, structure, ownership, or supply chain, including: <ul style="list-style-type: none"> i. Refer to section 2.0 Reference Framework ii. Not Applicable iii. Changes in the location of suppliers in line with point a.i., no changes in the structure of the supply chain, or relationships with suppliers, including selection and termination. 	3
102 - 11	Precautionary Principle or approach	Group CSR Strategy is incorporated in all operations. Operational decisions and actions take into account Group CSR commitments and therefore by keeping a precautionary approach.	-
102 - 12	External initiatives	Refer to Section 1.0 About this report, Section 4.0 Reporting structure and content, Section 8.1 Baseline, Section 8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals, Section 12.2 Human Rights, Working Relations & Conditions	3 / 4 / 8 - 11 / 13 - 15 / 23 - 27
102 - 13	Membership of associations	<ul style="list-style-type: none"> a. The Leading Hotels of the World 	3

17.0 GRI Index

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE/REPORT LOCATION	PAGE
102 - 14	Statement from senior decision-maker	Refer to Section 6.0 Chairman foreword	6
102 - 16	Values, principles, standards, and norms of behaviour	a. A description of the organization's values, principles, standards, and norms of behaviour. Oetker Code of Conduct – provided to all new employees	12, 23
102 - 18	Governance structure	a & b. Executive Committee Of Oetker Collection	-
102 - 40	List of stakeholder groups	Refer to section 8.1 Baseline	8 - 11
102 - 41	Collective bargaining agreements	100% of Oetker Collection employees are covered by collective bargaining agreements.	23
102 - 42	Identifying and selecting stakeholders	Refer to section 8.1 Baseline	8 - 11
102 - 43	Approach to stakeholder engagement	Refer to section 9.0 CSR Governance	16
102 - 44	Key topics and concerns raised	Refer to Section 12.2 Human Rights, Working Relations & Conditions, Section 13.1 Organization Overview, Section 14.1 Quality & Fair Operating Practices	23 - 27 / 30 / 37 - 38
102 - 45	Entities included in the consolidated financial statements	a. OHMC b. Not Applicable	-
102 - 46	Defining report content and topic Boundaries	Refer to Section 2.0 Reference framework and Section 4.0 Reporting structure and content	3, 4
102 - 47	List of material topics	Refer to Section 8.1 Baseline	8
102 - 48	Restatements of information	Palácio Tangará joined the Collection in June 2017. Therefore the % change calculations in Chapter 13.2 Environmental Monitoring, for this property, are based on estimated consumption values for Jan-May 2017.	31
102 - 49	Changes in reporting	Chapter 13.2 Environmental Monitoring is based on 8 Oetker hotels that were open during both 2017 and 2018, which include Brenners Park- Hotel & Spa, Château Saint-Martin & Spa, L'Apogée Courchevel, Hotel du Cap-Eden-Roc, Jumby Bay Island, Palácio Tangará, Le Bristol Paris and The Lanesborough. We excluded Eden Rock - St Barths as the hotel was closed between August 2017-December 2018 due to damage from Hurricane Irma; and we excluded Fregate Island, as this property left the Oetker Collection	31
102 - 50	Reporting period	Refer to Section 2.0 Reference framework	3
102 - 51	Date of most recent report	Corporate Sustainability Report 2017 (published July 2018)	6
102 - 52	Reporting cycle	Refer to Section 2.0 Reference framework	3
102 - 53	Contact point for questions regarding the report	Xenia zu Hohenlohe, considerategroup.com	57

17.0 GRI Index

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE/REPORT LOCATION	PAGE
102 - 54	Claims of reporting in accordance with the GRI Standards	Refer to Section 4.0 Reporting structure and content	4
102 - 55	GRI content index	Refer to Section 17.0 GRI Index	53 - 56
102 - 56	External assurance	For the 2018 Oetker Collection Group report external assurance was not requested, however for future reports Oetker Collection will evaluate practice.	-
302 - 4	Reduction of energy consumption	<p>a. Oetker Collection Group's total energy has decreased in 2018 by 7.39 Terajoules from the previous year, which is a 4% reduction.</p> <p>b. This calculation takes into account various energy sources such as:</p> <ul style="list-style-type: none"> • electricity • natural gas • district heating or cooling • steam <p>c. This calculation compares total energy use of the Oetker Group in 2018 compared to the previous year (2017). This comparison was chosen to align the calculation to the reporting period of this annual report, and to report on the most recent trends.</p> <p>d. The calculation is based on 8 Oetker hotels that were open during both 2017 and 2018, which include Brenners Park- Hotel & Spa, Château Saint-Martin & Spa, L'Apogée Courchevel, Hotel du Cap-Eden-Roc, Jumby Bay, Palácio Tangará, Le Bristol Paris and The Lanesborough. We used data tracked on Con-Serve[®] data management system to calculate the Year on Year change considering that consumption of the individual properties is tracked on this system, and Con-Serve[®] automatically translates the tracked data of various energy sources into a kWh. The converted values were exported into a CSV file to calculate the year on year difference in kWh value. The kWh value was converted into Joules to comply with the 302-4 GRI guideline. To allow for like for like Year on Year comparison calculations we:</p> <ul style="list-style-type: none"> • excluded Eden Rock St Barths as the hotel was closed between August 2017-December 2018 due to damage from Hurricane Irma • estimated missing 2017 data for Palácio Tangará based on 2018 data • excluded Fregate Island as this property left the Oetker Collection 	30 - 35

17.0 GRI Index

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE/REPORT LOCATION	PAGE
305 - 5	Reduction of GHG emissions	<p>a. The Oetker Collection's total emissions have decreased by 2% - 181 tonnes CO2 from the previous year.</p> <p>b. The calculation foremost includes CO2 emissions, although whenever CO2 equivalent factors where available these were applied.</p> <p>c. In line with the rest of the report, the calculation compares 2018 performance with the previous year (2017).</p> <p>d. Calculation includes Scope 1 and Scope 2 emissions - see below for the emission boundary.</p> <p>e. The calculation is based on 8 Oetker hotels that were open during both 2018 and 2017, which include Brenners Park- Hotel & Spa, Château Saint-Martin & Spa, L'Apogée Courchevel, Hotel du Cap-Eden-Roc, Jumby Bay Island, Palácio Tangará, Le Bristol Paris and The Lanesborough. Considering that the Oetker Group tracks the consumption of the individual properties in a Con-Serve[®] data management system, and considering that Con-Serve[®] is able to automatically calculate emissions based on local emission factors, this tool was used for the calculation. The GHG inventory includes Scope 1 and Scope 2 emissions, however, some emission sources are not yet tracked in Con-Serve[®] and therefore not included in the calculation, these exclusions are:</p> <p>Scope 1:</p> <ul style="list-style-type: none"> • Not all transport on Oetker owned vehicles is measured • We do not track fugitive emissions • Other <p>Scope 2:</p> <ul style="list-style-type: none"> • Electricity consumption at Lanesborough Spa not tracked yet • Other <p>To allow for like for like Year on Year comparison calculations we:</p> <ul style="list-style-type: none"> • excluded Eden Rock - St Barths as the hotel was closed between August 2017-December 2018 due to damage from Hurricane Irma • estimated missing 2017 data for Palácio Tangará based on 2018 data • excluded Fregate Island as this property left the Oetker Collection 	30 - 35
308 - 1	New suppliers that were screened using environmental criteria	Refer to Section 15.1 – Sustainable Purchasing	44

18.0 Appendix

Documents mentioned through out the report can be available upon request.

These documents include:

- Oetker Collection Ethical Charter
- Oetker Collection Sustainable Purchasing Policy
- Oetker Collection Code of Conduct

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