



OETKER COLLECTION

Masterpiece Hotels

CORPORATE SUSTAINABILITY REPORT 2019

Corporate Sustainability Report 2019

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I. Introduction

I.1 About this report

The 2019 Corporate Sustainability Report provides an account of Oetker Collection's 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 the Oetker Collection 2019 CSR Strategy.

The Executive Committee agreed to continue producing a formal reporting on corporate sustainability in line with the UN Global Compact Communication on Progress. Oetker Collection has participated in this reporting scheme since 2014 with Communication on Progress at Active Level, and Advanced Level was reached for the first time with the 2018 report.

I.2 Reference Framework

The report covers the period 1 January 2019 to 31 December 2019 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 until 20th November 2019 with only a small proportion of operations active. This property has consequently been excluded from some quantitative data analysis (namely in section 3.0 CSR Standard Results and 5.2 Environmental Monitoring), but information has been provided where possible.

I.3 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. 2122

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 Barthélemy (France), Vence (France).

Customers are individuals from worldwide markets.

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

REVENUE: Reported annual business revenue: 269M€

ASSOCIATIONS: The Leading Hotels of the World, Ltd (LHW) – the prestigious luxury marketing organization representing 400 of the world's finest hotels.

Headquartered in New York City, the company maintains a network of 18 regional offices in key cities around the world. Virtuoso – the leading global network of agencies specializing in luxury and experiential travel, with more than 20,000 advisors.

AWARDS: Several awards were attained by individual hotels of Oetker Collection. These are detailed in section 1.7.

I.4 Reporting Structure and Content

Oetker Collection's process for defining the report content and boundaries is based on the organization's 2019 CSR Strategy, which builds on the 2015 CSR Strategy. The CSR strategy focalizes on the principles and commitments intrinsic to the company's overall strategy, governance and decision-making process. These are detailed in section 2.0.

Furthermore, the report structure and content are in line with the UN Global Compact Communication on Progress., as well as addressing the UN Sustainable Development Goals (SDGs) Lastly, it provides an initial alignment to GRI Standards - Core options.

I. Introduction

I.5 CEO's Foreword

Stewardship - our Vision

“As Patrons for a safe and guaranteed future, we build meaningful connections with our communities and strive to protect the endearing places that have been entrusted to us”.

With this vision now firmly integrated into our company ethos at Oetker Collection we are delighted to present our 3rd UN Global Compact Report, laying out the progress we have achieved in all of our CSR initiatives over the last 12 months.

Hotel Operations with impact

The Travel & Tourism sector supports one in 10 jobs around the world and contributes 10.4% of global GDP; however, it is also responsible for 5% of global greenhouse gas emissions (WTTC, 2019). Furthermore, in 2018, the European Travel Commission estimated that 21% of the sector's emissions are attributed to hotels.

Studies have shown that the hotel industry must reduce its absolute CO₂ emissions by 66% by 2030 and by 90% by 2050 against a 2010 baseline in order to achieve the two-degree target of the Paris Climate Change Agreement of COP21 (ITP, 2017). The WTTC now also calls for commitment to sector-wide climate neutrality by 2050.

Hotels are businesses with various layers of impact as well as influence. Not only with their guests and clients, but also as employers and within the bigger circle of supply chains for products and produce used within operations. The potential to have a significant positive or negative impact is substantial.

For Oetker Collection, it has consequently been a key driver to integrate CSR at every level of each hotel's operations, we therefore commit to:

1. Ensure Human Rights
2. Consume Responsibly
3. Ensure Environmental Awareness
4. Engage with Sustainable Communities



These 4 commitments are the key pillars of our CSR Strategy, and have allowed us and allow us continuously to improve our hotel's environmental and social impact, forge ever-closer relationship with all our stakeholders and surrounding communities. Each commitment is further anchored through a series of principles, which enable us to create action plans and tasks, on which we are then able to report on progress. This report endeavours to deliver an in-depth collection of all initiatives, projects and improvements achieved. We are proud of the engagement of all our staff, in particular the CSR Patrons in charge of the implementation of our strategy at each property.

Some of the 2019 Highlights include:

- Improved supplier's engagement from 218 to 433, and therefore have much more transparency in our supply chain
- All hotels have at least one if not various charitable organisations they work with, and across the group we raised a total of 60,103€
- Infrastructural improvements to help reduce water and electricity consumption
- Awareness with staff around all issues relating to our CSR activities has increased exponentially with regular post on the internal PearlNet platform, an updated website, many more articles on the EdenBeing Blog highlighting all the great initiatives to our guests
- Re-opening of a new and better Eden Rock in St Barth's which has included the restoration of a mangrove area close to the hotel, improving the biodiversity on the island, offering more habitat for bird species and becoming a carbon sink, which also ensures protection for flooding, as well as a new coral reef restoration programme
- Nearly all hotels participated in both Earth Hour in March as well as World Cleanup day, collecting heaps of rubbish and garbage which would have otherwise ended up in nature
- Creation of the first group wide waste report, establishing a waste baseline and first steps towards our waste reduction goals of reducing overall waste by 10% by 2024

Dr. Timo Gruenert
Chief Executive Officer

A handwritten signature in black ink that reads "Timo Gruenert". The signature is fluid and cursive, written in a professional style.

I. Introduction

I.6 Oetker Collection Profile

About the Company

Oetker Collection embodies the finest of traditional European hospitality. These elite luxury hotels are strung together like pearls on a chain. Each is one-of-a-kind, unified by a desire to deliver the very best of life. Throughout Oetker Collection guests discover a "passion for living", an appreciation for culture, gastronomy and the pleasures of nature, which is why generations of guests return year after year to these "Masterpiece Hotels".



Oetker Collection embraces nine luxury hotels

L'APOGÉE COURCHEVEL – a luxury chalet with a warm 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.

I. Introduction

I.7 Sustainability Awards & Certifications

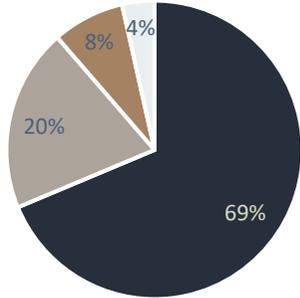
Award / Certification	Category	Hotel
Travel + Leisure World's Best Awards	No. 1 Hotel in London	The Lanesborough
Wine Spectator's 2019 Annual Restaurant Awards	Epicure (4 th year in a row)	Le Bristol Paris
AFAR Travelers' Choice Awards	Best Food & Wine Program (3 rd year in a row)	Le Bristol Paris
Gala Spa Awards 2019	Palace category	Le Bristol Paris : Spa La Prairie, Bonpoint, Tata Harper & Kos
World Spa Awards	England's Best Hotel Spa 2019	The Lanesborough Club & Spa
	France's Best Hotel Spa 2019	Hotel du Cap-Eden-Roc : Spa Eden-Roc by La Prairie
	Antigua & Barbuda's Best Resort Spa 2019	Jumby Bay Island
Forbes Travel Guide	One of the World's Best Hotel Bars 2019	Le Bristol Paris
	Five-Star Award 2019	
Traveller's Choice Awards of TripAdvisor	2 nd restaurant in the World 1 st restaurant in Europe 1 st restaurant in France	Le Bristol Paris: Epicure
	8th restaurant in Europe	Le Bristol Paris : 114 Faubourg

Award / Certification	Category	Hotel
US - Condé Nast Traveler Reader's Choice Awards 2019	#6 Top 20 hotels in Europe, France & Monaco	Le Bristol Paris
	#11 Top 40 hotels in Europe/London	The Lanesborough
	#9 Top 20 hotels Europe/France/Monaco	Hotel du Cap-Eden-Roc
	#28 Top 30 hotels in South America	Palácio Tangará
	#23 Top 25 Resort in the Caribbean & Atlantic	Jumby Bay Island
	#21 Top 30 in Destination Spa Resorts	Brenners Park-Hotel & Spa: Villa Stéphanie
The Leading Hotels of the World	Happy Guest Award	Le Bristol Paris
Tatler & Tatler Travel Guide	Grand Dames (whole category)	Hotel du Cap-Eden-Roc
VINUM 'German Wine List Awards'	Design & scene	Brenners Park-Hotel & Spa: Fritz & Felix
The International Hotel & Property Awards 2019	Restaurant Within a Hotel – Europe 2019	Brenners Park-Hotel & Spa: Fritz & Felix
Condé Nast Traveller - The best hotels in the world	Gold List 2020: Best hotels in Mexico and South America	Palácio Tangará
	Gold List 2020: Best hotels in the UK	The Lanesborough
	Gold List 2020: Best hotels in France	Le Bristol Paris

I. Introduction

I.8 2019 CSR HIGHLIGHTS & KEY FACTS

Employment contracts



■ Permanent ■ Seasonal ■ Temporary ■ Interns

433 companies
filled out the supplier CSR
survey



138 programs
are available on the Oetker
Collection Academy E-Learning
Centre

78+
ethnicities

4% Reduction
in CO₂ emissions
per room night

The 2nd group wide CSR
Strategy was implemented
for 2019-2024 defined by
**4 commitments, 13
principles and 36
objectives**

Gas consumption was
reduced by
5.3%
across the hotel group



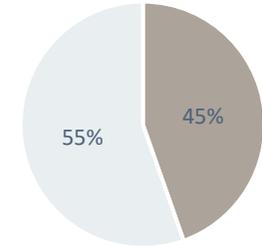
**24 and more CSR
Standards** were addressed
at each Hotel

The Hotels worked with various **local organisations**
and supported **19 different charities**

Oetker Collection reached a
score of **91%** in the LQA
assessment 2019, remaining
the leading brand in its
competitor set

€60,103
raised across the 9 Oetker
Collection properties in 2019

Employees per gender



■ Female ■ Male



Earth Hour 2019 was celebrated in
all Oetker Collection hotels, each with
special events

2. Corporate Social Responsibility

2.1 Corporate Social Responsibility at Oetker Collection

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 definition, 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

As Patrons for a safe and guaranteed future, we build meaningful connections with our communities and strive to protect the endearing places that have been entrusted to us.

OUR VALUES

Protect, respect and develop sustainable solutions.

OUR MOTTO AND LOGO



2.2 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 hospitality businesses, and companies from other industries linked to this sector, to operate more responsibly.

Considerate Group is the Oetker Collection CSR Team and is held accountable for the implementation of the Oetker Collection CSR Strategy. Considerate Group is assisted by CSR Patrons (previously known as CSR Officers) from each property (Table 1).

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 1: List of Oetker Collection 2019 CSR Patrons and Teams

HOTEL	CSR PATRON	CSR TEAM
BRENNERS PARK-HOTEL & SPA	Sascha DOMM	Brenners Greenkeeper
THE LANESBOROUGH	Ana GRILO	Green Pearl
LE BRISTOL PARIS	Matthieu BOURDON Chloe LEIGNADIER	Bee Green
HOTEL DU CAP-EDEN-ROC		Eden Earth
CHÂTEAU SAINT-MARTIN & SPA	Julie POIROT Amélie PIGEON	Team Avence
L'APOGÉE COURCHEVEL		BlablApogee
EDEN ROCK – ST BARTHS	Chloe GANSOINAT	Eden Angels
PAL ÁCIO TANGARÁ	Carlos FABBRIS	BurleBirds
JUMBY BAY ISLAND	(temporary) Aleksandra VUKOJEVIC Gerardo RINCON	TBC

2. Corporate Social Responsibility

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

Table 2: 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	Quarterly 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	Quarterly e-mails & annual meetings	Indirect
	Operations Staff	Monthly e-mails	Indirect
	All Oetker Collection staff	Internal Social Media System 'PearlNet' monthly postings	Direct
GUESTS & CONSUMERS	Guests	Visual communication in hotels & website	Indirect
SUPPLIERS	Group suppliers & individual hotel suppliers	Annual survey	Indirect

The remainder of the report will present 2019 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.

2.3 First CSR Strategy

The work on Corporate Social Responsibility has a long tradition at Oetker Collection.

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 and included 6 additional subject areas related to governance (Afnor X 30-031 benchmark document).

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 Hotel associations
EMPLOYEES Administrative staff Accommodation staff Catering staff Technical staff Future employees	SUPPLIERS Partner suppliers Key account suppliers Local suppliers
GUESTS & CONSUMERS Resident guests External guests Prospective guests	COMMUNITIES, CIVIL SOCIETY & NGOs Charities (Humanitarian and Nature conservation) Local associations Neighbours
PUBLIC AUTHORITIES & COMPLIANCE Social bodies Tax bodies Regulatory bodies Safety commission Certification schemes	MEDIA & COMMUNICATION VIP Press Fairs & Exhibitions Generic press Vocational Training TV Schools PR Agencies Trade Unions Social Media

2. Corporate Social Responsibility

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

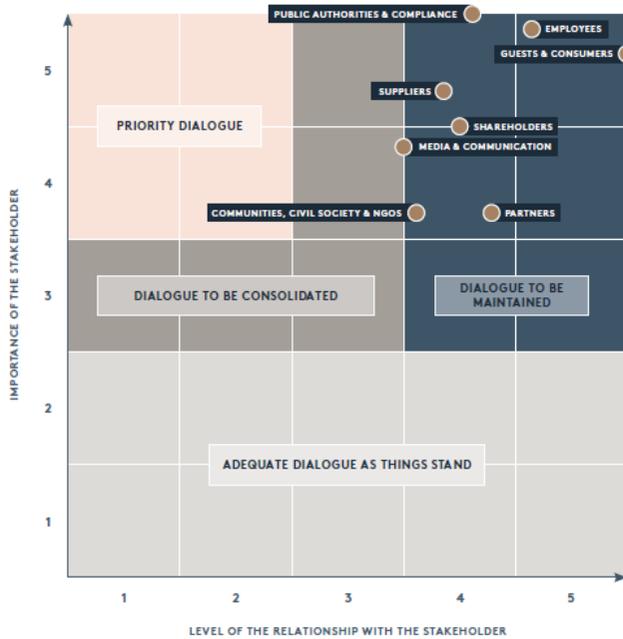


Figure 1: Dialogue priorities established in 2014 by Château Saint-Martin and Hotel du Cap-Eden-Roc

The social responsibility assessment of the two French properties 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.

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

- Le Bristol Paris (LBP)
- 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 Oetker Collection)

The other five establishments were not assessed as:

- Frigate Island Private – results were not received (no longer part of 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



Figure 2: Milestones of CSR work over the years

2. Corporate Social Responsibility

The 2014 Group Level CSR Baseline Assessment demonstrated that the social theme, with core subjects of human rights, working relations and conditions, scored best throughout all establishments, while governance and environmental considerations were not integrated in all establishments as well. Following from the audit, Julie Poirot developed a group CSR Strategy in 2015, with a focus on improving governance and environmental performance.

This first group wide CSR Strategy, referred to as the Oetker Collection 2015 CSR Strategy, remained valid from 2015-2018 and comprised 4 commitments and 10 Principles. To pursue commitments and principles, annual group wide CSR reports were implemented and goals were set on a yearly basis. Initially 5 goals were tracked for 2015-2016; an additional 6 goals were established for 2017, and another 5 goals were added in 2018

2.4 2019 Strategy

Scope

The new 2019 CSR Strategy of Oetker Collection was developed in consultation with the ExCo, and builds on the Oetker Collection's 2015 CSR Strategy. This revision also considers the results of a materiality analysis carried out in 2018, as well as voluntary CSR frameworks and new legal requirements.

The materiality assessment was undertaken by Group CSR Team in line with the Global Reporting Initiative (GRI) methodology. The analysis, based on feedback from Heads of Departments from each property, identified the following topics as most material:

- Guest Engagement & Satisfaction;
- Human Rights & Labour Standards;
- Economic Growth;
- Health & Safety;
- Diversity, Equality & Engagement;
- Risk Management.

The 2019 CSR Strategy covers all these six topics under various commitments.

The scope of the 2019 CSR Strategy has also been shaped by global CSR frameworks. Specifically, Oetker Collection submits a yearly Communication on Progress to the UN Global Compact (UNGC), therefore the strategy is set out to cover all 21 criteria of this framework to achieve advanced level communication. The 2019 CSR Strategy also addresses the 17 SDGs, and Appendix 9.1 specifies initial alignment to GRI Standards – Core option.



Structure

The 2015 CSR Strategy provided a sound foundation for the new strategy. In the framework established in 2015, commitments are at the heart of the strategy and are refined into principles, objectives and standards respectively (Figure 3).

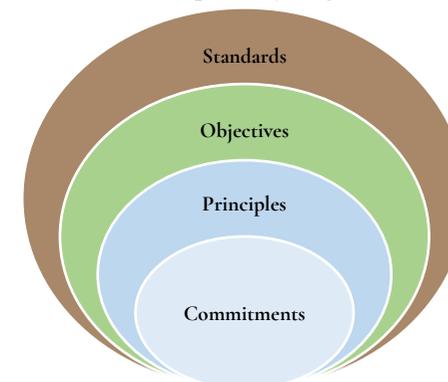


Figure 3: Elements of the CSR Strategy

2. Corporate Social Responsibility

A summary of the 2015, 2017 and 2018 objectives and their status quo are included in Table 3. Those that were not achieved have been carried through to the 2019 strategy.

Table 3: Overview of objectives from 2015 CSR Strategy, with the year in which the objectives were set, progress made and the corresponding objective from the 2019 Strategy

Year	Objective	Progress	Corresponding Objective 2019 Strategy
2015	Measure and compare our water and energy consumption	ACHIEVED	
2015	Incorporate sustainable purchasing in the purchasing strategy	ACHIEVED	
2015	Raise awareness of 90% of our employees on social responsibility	IN PROGRESS	3.1.2. Ensure all new employees are introduced to Group CSR
2015	Reach a figure of 30% of local suppliers out of our total number of suppliers	IN PROGRESS	2.4.2. Increase transparency of our supply chain by 50% and work closely with all our suppliers to drive sustainable businesses
2015	Reach the score of 4 on the Opinion Survey on the “communication, training and career prospects” questions	NOT ACHIEVED	1.2.1. By 2020 ensure all Oetker Collection employees have access to E-learning platform
2017	Measure, compare and reduce our water and energy consumption	ACHIEVED	
2017	Establish a comprehensive and integrated communication strategy for all CSR activities	ACHIEVED	
2017	Create an internal Green Champion Award system at hotel level	ACHIEVED	
2017	Create a relationship with a local charity	ACHIEVED	
2017	Ensure gender equality, optimal health and safety conditions for all employees	IN PROGRESS	1.1.5. By 2021 monitor all interview processes for equal opportunities for new applicants via software Talentsoft, including feedback from applicants 3.2.1. By 2020 integrate 5 CSR questions in the annual employee survey
2017	Establish a new sustainable product for each month of the year, favouring local suppliers where possible	IN PROGRESS	4.1.1. By 2022 foster 3 relationships with local and artisanal enterprises at each hotel (starting 2019)
2018	Create an internal Green Champion Award system at group level	ACHIEVED	
2018	Establish equality label by March 2018	IN PROGRESS	1.1.1. By 2020 develop a Group Equality Label 1.1.2. By 2023 ensure implementation of Group Equality Label
2018	Reduce electricity, water, fuel & heat consumption	IN PROGRESS	2.1.1. By 2024 reduce absolute energy consumption by 10% (at group level) 2.1.2. By 2024 reduce absolute water consumption by 10% (at group level)
2018	Complete all of the 2017 & 2018 CSR Standards by the end of 2018	IN PROGRESS	
2018	Ensure completion of CSR Survey by 100% of Group suppliers	IN PROGRESS	2.4.2. Increase transparency of our supply chain by 50% and work closely with all our suppliers to drive sustainable businesses

4 commitments, 13 principles and 36 objectives were defined in the 2019 strategy itself, and standards remain as an adaptive component which are set on a yearly basis, and used internally to improve performance and track progress.

In fact, the overarching commitments of Oetker Collection remain unchanged since 2015:

1. Respect Human Rights
2. Consume Responsibly
3. Ensure Environmental Awareness
4. Engage with Sustainable Communities

2. Corporate Social Responsibility

Changes between the 2015 and 2019 CSR Strategy can be seen in Figure 4 (below). Finally, Table 4 sets out the new objectives for the 2019 CSR Strategy (following pages).

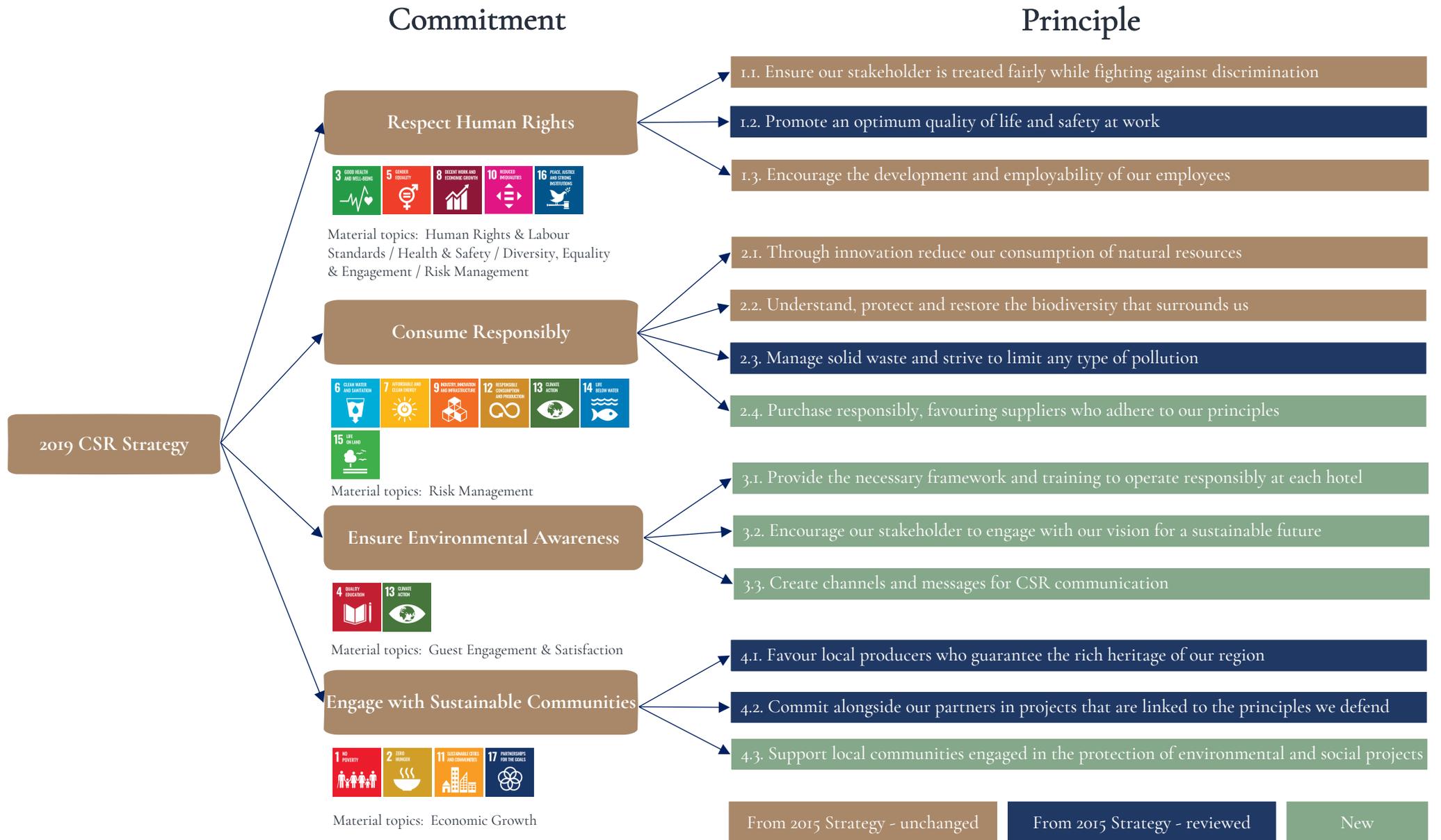


Figure 4: Overview of Oetker Collection 2019 CSR Strategy and inputs

2. Corporate Social Responsibility

Table 4: Objectives of the 2019 CSR Strategy per Commitment and Principle

Commitment 1: Respect Human Rights

Principle	Objective
1.1. Ensure our stakeholder is treated fairly while fighting against discrimination	1.1.1. By 2020 develop a Group Equality Label
	1.1.2. By 2023 ensure implementation of Group Equality Label
	1.1.3. By 2020 ensure SDG Target 5.2. is addressed with Group's outsourced service companies
	1.1.4. By 2025 every hotel should endeavour to employ people with a physical disability into their Back Office
	1.1.5. By 2021 monitor all interview processes for equal opportunities for new applicants via software Talentsoft, including feedback from applicants
1.2. Promote an optimum quality of life and safety at work	1.2.1. / 1.3.1. By 2020 ensure all Oetker Collection employees have access to E-learning platform
	1.3.2. By 2020 ensure there is a system in place to test employees on Oetker Collection Code of Conduct every 3 years
1.3. Encourage the development and employability of our employees	



Commitment 2: Consume Responsibly

Principle	Objective
2.1. Through innovation reduce our consumption of natural resources	2.1.1. By 2024 reduce absolute energy consumption by 10 % (at group level)
	2.1.2. By 2024 reduce absolute water consumption by 10% (at group level)
2.2. Understand, protect and restore the biodiversity that surrounds us	2.2.1. By 2021 each property to commit to the protection of 1 species within their surrounding area
	2.2.2. By 2020 each property to ensure their operation is not negatively impacting surrounding biodiversity
2.3. Manage solid waste and strive to limit any type of pollution	2.3.1. By 2024 reduce absolute solid waste by 10% (at group level)
	2.3.2. By 2023 reuse or upcycle 5 solid waste items (in each property)
	2.3.3. By 2024 increase recycling rate by 10% at group level from 2018 performance
	2.3.4. By 2020 ensure all properties use organic fertilizers and pesticides
	2.3.5. By 2024 Increase use of eco-friendly cleaning products by 10% in each property
	2.3.6. By 2020 ensure all properties are using best available technology to reduce building emissions in line with national legislative requirements
	2.3.7. By 2020 all properties to provide fleet of sustainable vehicles for guest use
2.4. Purchase responsibly, favouring suppliers who adhere to our principles	2.4.1. By 2020 ensure all properties are instructed to buy in bulk to reduce transport and packaging
	2.4.2. Increase transparency of our supply chain by 50% and work closely with all our suppliers to drive sustainable businesses

2. Corporate Social Responsibility

Table 4 (cont): Objectives of the 2019 CSR Strategy per Commitment and Principle

Commitment 3: Ensure Environmental Awareness

Principle	Objective
3.1. Provide the necessary framework and training to operate responsibly at each hotel	3.1.1. Ensure all hotels have an operational CSR Team
	3.1.2. Ensure all new employees are introduced to Group CSR
	3.1.3. Ensure all CSR standards are fully implemented by 2024
	3.1.4. Create online CSR training modules by 2024
3.2. Encourage our stakeholder to engage with our vision for a sustainable future	3.2.1. By 2020 integrate 5 CSR questions in the annual employee survey
	3.2.2. Annually develop at least one guest CSR experience per property
	3.2.3. Annually develop two CSR staff event per property
3.3. Create channels and messages for CSR communication	3.3.1. Annually update CSR content on website
	3.3.2. By 2022 achieve Advanced Level of UN Communication on Progress & align to GRI Core option
	3.3.3. Conduct quarterly update on CSR topics for PR usage
	3.3.4. Create CSR Photo Library for Oetker Collection
	3.3.5. Increase CSR social media posts for all properties on a bi-monthly basis by 2021
	3.3.6. By 2020 develop a Social Media Strategy in line with CH Social Media Planner for PearlNet posts



Commitment 4: Engage with Sustainable Communities

Principle	Objective
4.1. Favour local producers who guarantee the rich heritage of our region	4.1.1. By 2022 foster 3 relationships with local and artisanal enterprises at each hotel (starting 2019)
4.2. Commit alongside our partners in projects that are linked to the principles we defend	4.2.1. By 2021 establish a system to ensure partner collaborations at property level are guided by at least one of our principles
4.3. Support local communities engaged in the protection of environmental and social projects	4.3.1. By 2021 every property to engage in at least two projects where every staff member can participate in

2. Corporate Social Responsibility

2.5 2019 CSR Standards

In 2018 the Oetker Collection CSR Team developed 24 CSR Standards to establish tangible actions for the Oetker Collection CSR Strategy and easy to implement at each property in their own context. These CSR Standards are aligned to the Principles & Objectives and were applied in 2019:

1. Respect Human Rights:

- 1.1 Communicate and implement Group Equality Label

2. Consume Responsibly:

- 2.1 Only provide sustainably sourced fish for all staff canteens and guest restaurants
- 2.2 a: Recycle Nespresso capsules with B2B service or replace with biodegradable capsules
 - b: Communicate coffee capsule recycling or composting program
- 2.3 Source sustainable coffee and tea only
- 2.4 Use only free range and organic eggs and avoid purchasing meat from intensive mass animal farms
- 2.5 a: Avoid plastic cups in staff canteens
 - b: Replace all plastic materials in-room (e.g. plastic bottles, laundry delivery bags, slippers sleeves, newspapers bags)
- 2.6 a: Use ecological cleaning products *
 - b: Use ecological laundry products
- 2.7 Ensure property has a recycling system in place for both back and front of house trash
- 2.8 Complete already started LED retrofit installations and share best practice with other engineers within Oetker Collection
- 2.9 Use FSC or sustainably certified paper and aim for paperless communication
- 2.10 Do not plant non-native invasive or endangered species
- 2.11 Seek renewable energy utility contracts
- 2.12 Provide fleet of sustainable vehicles for guest use *
- 2.13 Identify, plan and conduct for infrastructural improvements to reduce property's water consumption *

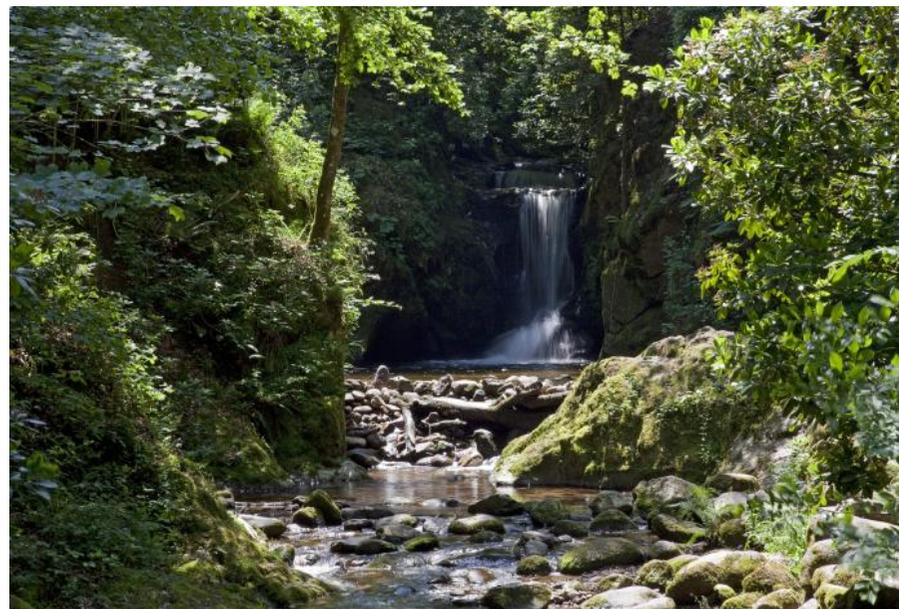
* new standards for 2019

3. Ensure Environmental Awareness:

- 3.1 Give guests the choice to change their towels and sheets at two days interval
- 3.2 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 programs for these
- 3.3 Create two CSR events to engage staff and guests per year *
- 3.4 a: OC Social Media Channels – 2 Instagram stories per month #GreenPearl*
 - b: For every quarter post one CSR achievement on PearlNet and for OC Social Media Channels *
- 3.5 Recruit one new CSR team member per year *
- 3.6 Implement an employee car sharing scheme *

4. Engage with Sustainable Communities

- 4.1 Indicate local (sourced within 200km from hotel) products and dishes in all room service and restaurant menus
- 4.2 Provide Responsible Purchasing Supplier Questionnaire to suppliers with greatest impact on hotel's costs
- 4.3 Foster relationships with local and artisanal enterprises *
- 4.4 a: Support one local and one international charity
 - b: Support a charity which focuses on preserving on local species *



3. 2019 CSR Standard Results

All Oetker Collection properties addressed the CSR Standards in 2019; results can be seen below. Palácio Tangará, Le Bristol and Hotel du Cap-Eden-Roc led Oetker Collection having achieved more than 85% of the 24 standards.

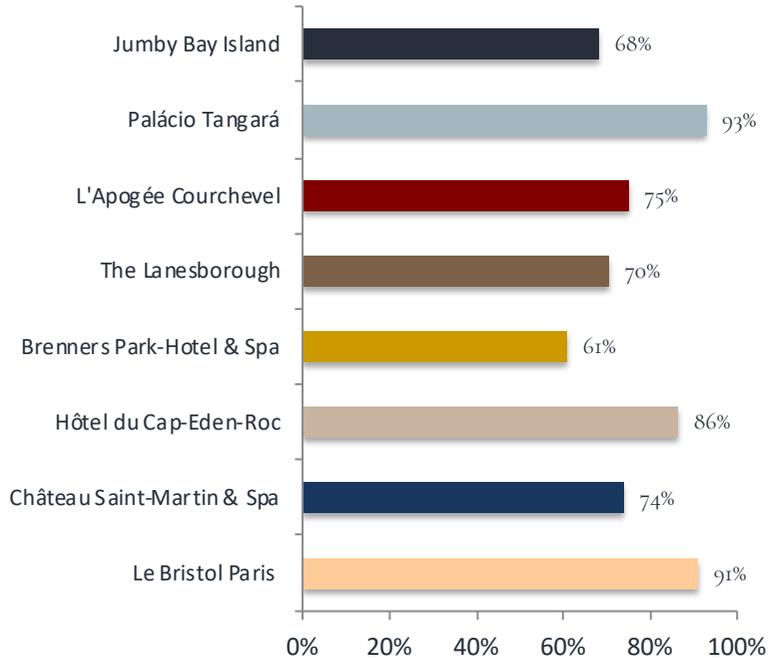


Figure 5: Oetker Collection property CSR Standard performance in 2019

Oetker Collection managed to achieve a high implementation rate across the standards. Throughout 2019, each of the hotels reported progress on at least 20 of the 24 Standards. In this way, 16 of these standards were implemented to at least 75% across the group. Standard 2.10 was fully implemented at group level; and standards 2.4, 2.9 and 4.1 were implemented to over 90%. Standard 2.13 scores lowest with 38%, with only two of the hotels having fully implemented this standard. No hotel has implemented Standard 1 as this is being developed at Group Level.

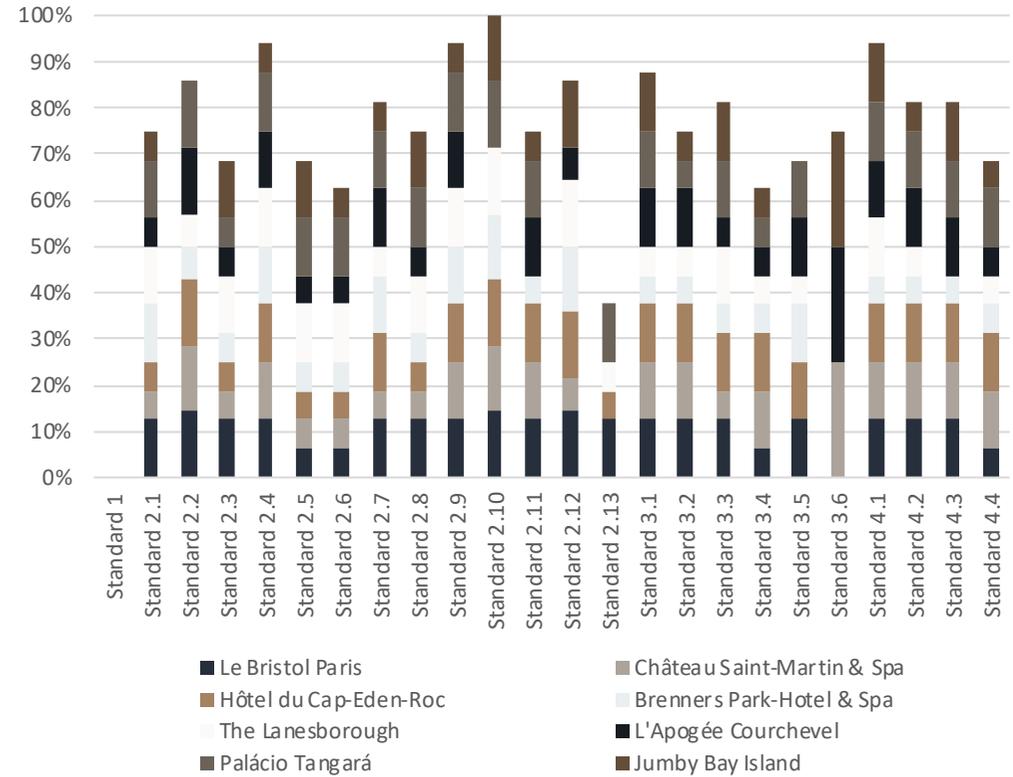


Figure 6: Oetker Collection CSR Standard performance

3.1 CSR Standards Outlook 2020

For 2020 some of the current standards will be amended and 5 new standards will be added in order to drive the Group's CSR Strategy objectives forward. Standard 2.10 has, by the end of 2019, been fully implemented, and will therefore be removed. In 2020 Group CSR Team will continue working with all CSR Patrons and properties to achieve all CSR Standards.

4. Commitment I - Respect Human Rights

Principles:

- I.1 Ensure our stakeholders are treated fairly while fighting against discrimination
- I.2 Promote an optimum quality of life and safety at work
- I.3 Encourage the development and employability of our employees

Alignment to SDGs:



Material topics addressed:

- Human Rights & Labour Standards
- Health & Safety
- Diversity, Equality & Engagement
- Risk Management

4.1 HR Key Figures

The total number of Oetker Collection employees in 2019 was 2,122. In 2018, the Group implemented a common HR software called Talentsoft to collect more employee data. Prior to implementing Talentsoft, as well as during 2019, each individual property collected employee information and hotels regularly ran workforce reports to match with budget. The introduction of the software Talentsoft likely improved the data quality, and further data improvements are anticipated for 2020.

The diversity of the employees in 2019 was as follows:

- Gender: 45% Female and 55% Male
- 78+ different ethnicities are represented (see Figure 7 for more details)
- Age demographics (see Figure 8):
 - 35% under 30 years old
 - 46% between 30 and 50 years
 - 19% above 50 years old
 - 1% of unknown age

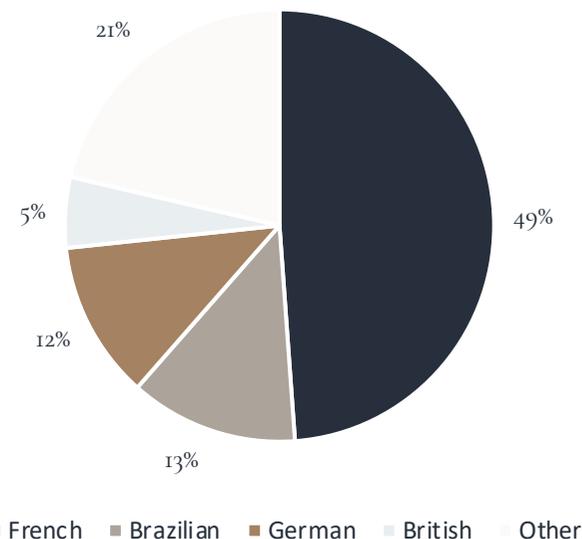


Figure 7: Employees per ethnic background

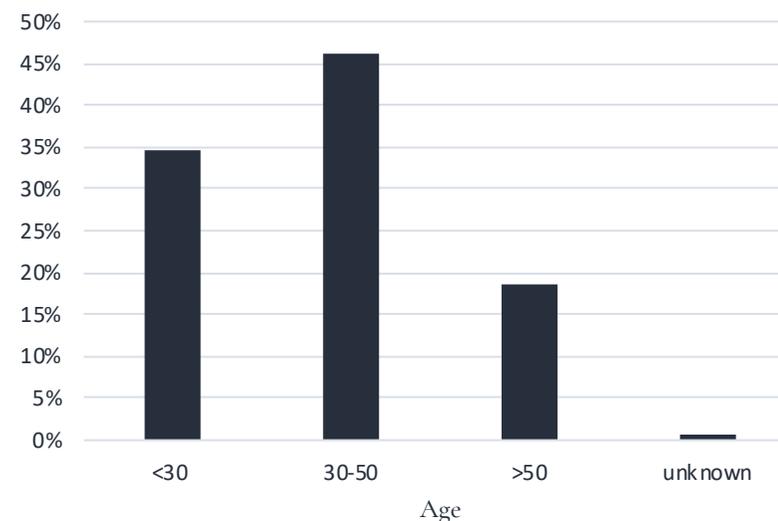


Figure 8: Employees per age category

4. Commitment I - Respect Human Rights

Employees perform 99% of the organization's activities with 1% of work being performed by external consultants with a commercial signed agreement.

Oetker Collection focusses mainly on permanent employment contracts. In 2019, 69% of staff were employed permanently. Due to the nature of the hospitality industry and location of specific hotels, 20% of employees had seasonal contracts, 8% had temporary contracts and another 4% of staff are interns.

Seasonal contracts were only used at the seasonal hotels Château Saint Martin, Hotel du Cap-Eden-Roc and Eden Rock – St Barths in St. Barthélemy. Other seasonal hotels are L'Apogée Courchevel in France and Jumby Bay Island in Antigua. Jumby Bay Island employs a regular workforce and an additional temporary workforce during their high season (December to April).



4.2 Human Rights and Labour Laws

Policies

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. At the same time, all team members are responsible to uphold Oetker Collection's core values: Family, Authenticity, Trustworthy, Joy, Subtlety, Humility, Creativity.

Oetker Collection respects internationally recognised human rights frameworks, including the Universal Declaration of Human Rights and the European Convention of Human Rights.

Furthermore, Oetker Collection's compliance with local and international labour laws is non-negotiable and all Oetker Collection employees are covered by a collective bargaining agreement.

The Dr. August Oetker KG Code of Conduct is the policy which applies to all suppliers of the Oetker group including those of Oetker Collection, publicly expressing their commitment to respect and support human rights and to ensure sustainable use of environmental resources. The policy refers to the protection of employees and requirements such as defined by the Convention of the ILO and other applicable national laws. Environmental resources should be handled sparingly and continuous improvements implemented to reduce environmental pollution.

Further to this, Oetker Collection developed its own Responsible Purchasing Charter which lays down the organisation's ethical values and its social responsibility and environmental commitments in the Purchasing process. The policy draws upon the recommendations included in the Afnor documentation booklet, FD X 50-135, on "the integration of Sustainable Development challenges in the purchasing function", and on the charter of inter-company relations of the CDAF (Association of Purchasing Managers in France) and the Credit Mediation Department. Additionally, the Purchasing Policy has been aligned to reflect Oetker Collection's CSR Strategy. (More details about the distribution and use of this policy under Section 7.1 Sustainable Purchasing.)

4. Commitment I - Respect Human Rights

The Oetker Code of Conduct applies to all domestic and foreign companies which as part of the The Dr. August Oetker KG and is implemented by the individual Group companies such as Oetker Collection. The principles of conduct specified in the Code of Conduct are binding for all members of the supervisory boards, managing directors, executives and staff members of the Oetker Group. The content of the Oetker Collection “constitution” is aligned with labour laws that are under the umbrella of the Universal Declaration of Human Rights.

The Oetker Code of Conduct 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).

The Oetker Group developed a Compliance Management System in line with the group’s fair operating practices and increasing legal requirements (see Section 6.1)

Communication

To ensure its distribution, the 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. Employees can view their rights and responsibilities and their compensation and benefits through their employment contract, collective bargaining agreement, property handbook and welcome book. Furthermore, staff attend induction programs whereby senior managers present and reflect on the company’s values, philosophy and principles.

Monitoring and evaluation

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 reporting of the hotels on 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.

Human rights

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, ExCo Members OHMC, 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.

Once investigated and verified a disciplinary process is applied up to and including the termination of the employment depending on the level and severity of the offence.

The SVP HR continually reviews the Human Rights status with the most senior level of management to ensure remedial action on any cases that arise. Remediation processes can include training, communication and discipline as appropriate.

In the area of human rights, the following goals have been set for 2020:

- Promote diversity and inclusion and provide leadership training in this regard
- Focus on hiring a minimum 1% of our workforce on people with disabilities by creating partnerships in our communities
- Focus on analysing reasons for employment risks
- Implementation of HR Core Guidelines for each hotel to align to
- Create exit interviews and reasons for turnover
- Introduce a new Employee Engagement survey that allows for confidential feedback and confidential reach out for harassment of any kind
- Create whistle-blower policy and confidential hotline to the HR Corporate office



4. Commitment I - Respect Human Rights

Labour rights

Oetker Collection is transparent to labour law authorities and always seeks their advice.

Since 2016, Oetker Collection collaborates with their local trade unions, endeavouring a respectful and open dialogue and exchange with the union partners. 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.

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

- conducted employment legal risk assessments in the 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 meetings with General Manager and/or Executive Committee Members
- led the review of labour principles results and shared key issues and actions to take up with senior management
- put in place the following communication programs:
 - Work Council Committees
 - Direct Line Meeting
 - General Assembly/Town Hall
 - Department Meetings
 - GM and/or ExCo Members inviting various team members for casual dialogue over a meal
 - Engagement Survey: once a year with action plan follow up

Health and safety are ensured through local laws and Health & Safety Committee meetings. Health & Safety Committees are currently in place in France, Germany and Brazil and Oetker Collection intends to mandate these at all hotels. Additionally, the Oetker Collection opinion survey includes pertinent questions to cover health and safety and the collection of statistical data is investigated during the implementation of the new HR software, Talentsoft.

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.

There were no Human Rights incident reports in 2019.

Outlook to 2020:

- Over and above the ongoing dialogue with senior members at hotel level, the focus in 2020/2021 is to implement further programs i.e. a % of workforce to be comprised of people with disabilities. Also, in the recruitment process, equal pay will be ensured through clear pay grades identified according to the specific competency.
- Training on labour rights and policies is planned at management level throughout 2019 and 2020
- The Corporate Office is presently rolling out the HR Core Guidelines to all hotels. These guidelines will ensure that leaders in each hotel (including CSR, HR, Sales & Marketing, Finance, Purchasing, Operations) understand expectations and guidelines. These guidelines also cover risk assessments, and programs to remedy any ineffective grievance mechanisms
- HR Initiatives will also include Exit and Stay Interviews, GM Dialogues, EAP program (employee assistance program, that allows for confidential whistleblowing), and a confidential hotline at the Corporate level.
- E-learning platform Openelms has been introduced across the group and is now accessible to all employees

4. Commitment I - Respect Human Rights

4.3 Staff development

Engagement is a feeling produced by the addition of satisfaction and involvement at work.

- 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.

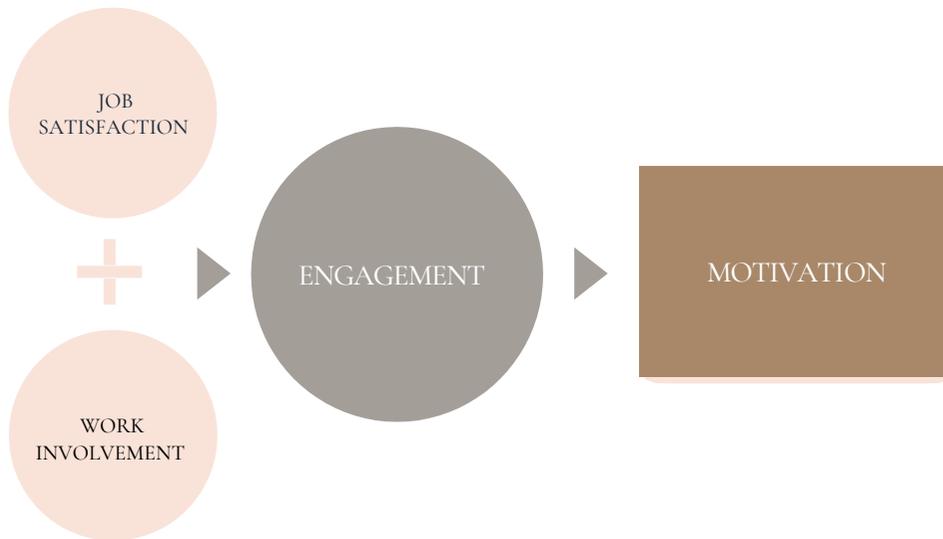


Figure 9: Oetker Collection Engagement Measurement

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

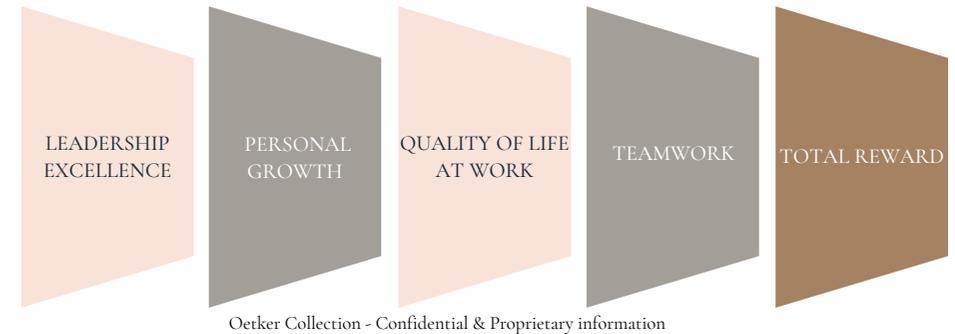


Figure 10: Oetker Collection Engagement Drivers Measured

The engagement survey for 2019 was underway in March 2020 but was then put on hold due to COVID-19. The survey is now planned for fall 2020, and will be completed through a new survey provider with improved confidentiality, questions, analytics and action planning.

The group believes that education is key to develop and sustain the long-term future of generations to come. Specifically, 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.

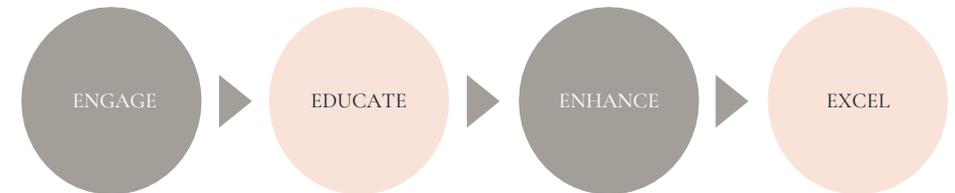


Figure 11: Oetker Collection learning Phases

4. Commitment I - Respect Human Rights

Oetker Collection is progressively deploying the Oetker Collection Academy E-Learning Centre to encourage the development and employability of staff. The Academy is a comprehensive ongoing 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".

Results for Oetker Collection Academy

	Total programs	Total sessions	Total hours of training	Total participants
2018	8	18	152	134
2019	138	401	487	117

Table 5. Total number Academy activities provided through OHMC

The OHMC provides training through the Oetker Collection Academy while the hotels provide their own training to team members and managers. In June 2019, Oetker Collection launched one new face to face training for managers and the E-Learning Course Library. In comparison to the previous year, the number of sessions therefore increased significantly. The E-Learning Course Library offers a large variety of programs accessible to all Oetker Collection Staff, covering topics such as information about Oetker Collection itself, specific service, communication or technical skillsets and health and safety. 5.5% of the staff participated in training sessions, spending an average of 4 hours learning.



4.4 Property Actions & Processes

BRENNERS PARK-HOTEL & SPA

- Two Health Weeks dedicated to the topic of health management were organised. During these weeks Brenners Park-Hotel & Spa offers varied sports activities for the staff
- A Children Staff Party was organised for the employees' children to celebrate the traditional children's party at a scenic location in the Black Forest with various activities and a close-up magician

EDEN ROCK – ST BARTHS

- Refurbished the staff canteen

HOTEL DU CAP-EDEN-ROC

- An expression meeting was organised where the General Manager and the Human Resources Manager answered the questions of the employees
- Several days per month, an osteopath comes to the hotel for the employees
- A week dedicated to the quality of life of the employees in their workplace was set up: The Prevention Department, the Human Resources Department and the CSR Department coordinated several workshops throughout the week with a different theme every day
- Several topical days were organised:
 - Wellness day with massage sessions
 - Health day with a menu based on organic produce
 - Environment day with a visit to the park

CHÂTEAU SAINT MARTIN & SPA

- A program dedicated to the quality of life of the employees in their workplace was set up, including massage sessions during a wellness day
- An expression meeting was organised where the General Manager and the Human Resources Manager answered the questions of the employees

L'APOGÉE COURCHEVEL

- Themed menus were organised in the staff canteen
- An expression meeting was organised where the General Manager and the Human Resources Manager answered the questions of the employees

4. Commitment I - Respect Human Rights

THE LANESBOROUGH

- The diversity of food in the staff canteen increased, with vegan options offered at times
- Weekly bootcamps were offered during summer
- The training room was renovated
- Stress Awareness month was acknowledged in April with reflexology sessions, meditation sessions, wearing blue – an anti-stress colour, and the provision of relaxing teas/infusions
- National Chocolate Day and the Fish and Chips Day were celebrated in the staff canteen

PALÁCIO TANGARÁ

- Meatfree Mondays were continued in the staff cafeteria
- An Employees Cafeteria Committee was organized to improve the quality of meals
- Election of the 2019/2020 Labour Internal Commission for Preventing Accidents (named CIPA, including four Team Members and four members of the Executive Committee) with the participation of 208 team members. Main objectives of this commission are to:
 - Study the labour environment, the conditions of work, and the risks posed by operations
 - Analyse and suggest actions to prevent accidents and diseases
 - Develop campaigns regarding labour conditions and health at work
- Pink October - Breast Cancer Prevention, and Blue November – Prostate Cancer Prevention : prevention material was shared through speeches, meetings, events, e-mails and videos

JUMBY BAY ISLAND

- Bought specialist clothing for maintenance staff (boots, gloves etc.)
- Implemented its Engagement Survey
- An Island clean-up was organised, and there are plans to do this monthly on the mainland too
- The quality of food at the staff canteen is continuously monitored and the offerings now include more healthy options – fruits, vegan alternatives and more
- A closing party was held to thank the staff before the hurricane season
- Team building with staff and managers was organised at the hotel reopening

- Staff were offered reusable Jumby Bay bottles, helping to avoid the use of plastic cups and other single use containers
- New training options were offered to the butler of the private villa
- The staff was served a special Thanksgiving Lunch and a Christmas Menu by ExCo
- Monthly Birthday celebrations took place
- Staff participated in online training modules by HSKP team

LE BRISTOL PARIS

- The working conditions of employees was improved through: New equipment such as an electrical trolley for housekeeping staff, new motorised equipment for lifting, and telescopic scaffolding for painters; Improved office spaces for cleaners and work council
- The staff were thanked for their efforts on LQA with a large cake
- Organised cocktail events for parents as well as for apprentices
- Established an anti-heatwave plan
- A monthly vegetarian menu was introduced, and an infographic was created on the environmental impact of foods and the vegetarian diet
- Reusable bottles were distributed to all staff to avoid the use of single-use plastic bottles, supported with an infographic on the topic
- A photo campaign was run, in which staff teams took pictures of themselves with moustaches to raise awareness about prostate cancer



5. Commitment 2 - Consume Responsibly

Principles:

- 2.1 Through innovation reduce our consumption of natural resources
- 2.2 Understand, protect and restore the biodiversity that surrounds us
- 2.3 Manage solid waste and strive to limit any type of pollution
- 2.4 Purchase responsibly, favouring suppliers who adhere to our principles
- 2.5 Ensure environmental awareness

Alignment to SDGs:



Material topics addressed:

Risk Management

5.1 Organisation Overview

Environmental goals are integrated in the overall Oetker Collection CSR Strategy and environmental stewardship is described in the Oetker Collection Code of Conduct; therefore, the group has not developed a separate environmental policy. Environmental commitments are addressed through the 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. The latter are also 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 Leadership summit. During the summit, the group exchanges Oetker Collection overall goals and incentives, which are ultimately aligned to the CSR Strategy.

5.2 Environmental Monitoring

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



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

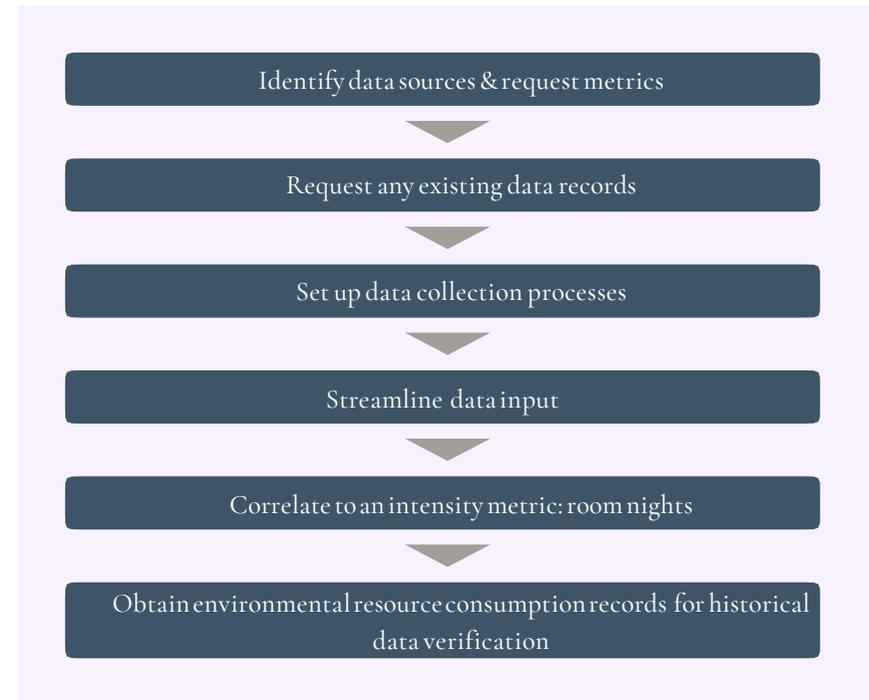


Figure 12: Establishing environmental monitoring baseline for Oetker Collection properties

5. Commitment 2 - Consume Responsibly

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 quarterly 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, comparison against target values, key electricity, fuel, heat and water statistics, identification of hotspots and best practice, carbon footprint summary and action points.

Please note that the following calculations exclude Eden Rock – St Barths, which closed at the end of August 2017 due to Hurricane Irma, with only a small proportion of operations active until re-opened in November 2019. Estimates were used for a few data points for Hotel du Cap-Eden-Roc, Château Saint-Martin, L'Apogée and Palácio Tangará (see individual hotel reviews).

Table 6: 2019 Group Year-on-Year Summary

Metric	Electricity	Gas	Water	Cost	CO ₂
Year on Year change	-1.7%	-5.3%	-1.0%	3.3%	-2.2%
Per room night change	-3.7%	-8.1%	-2.9%	1.3%	-4.1%
Change equivalent to:	 5,330 full charges of a Tesla Model S car	 Average annual gas consumption of 67 German homes	 67,398 showers of average length	 53,346 Dr. Oetker Ristorante Pizzas	 3,674 tree seedlings grown for 10 years

Overall, 2019 Group environmental consumption has decreased from the previous year as shown in Table 5.

In 2019, Oetker Collection's electricity use has reduced by 2%, and per room night consumption has reduced by 4% compared to 2018. Simultaneously, fuel/heat use has reduced by 5%, and per room night consumption has reduced by 8%. Finally, water use decreased by 1.5%, a reduction of 3% per room night.

The annual analysis includes identification of best practice for each property. Highlights in 2019 are demonstrated in Figure 13.

BRENNERS PARK-HOTEL & SPA

Brenners Park-Hotel & Spa reduced their electricity consumption by 3.6%

This saving would fully charge **1,168** Tesla Model S cars



HOTEL DU CAP-EDEN-ROC



Hotel du Cap-Eden-Roc reduced their gas consumption by 12.8%

Similarly to Brenners Park, they achieved this despite an increase in occupancy (1.25%)

This saving would heat **12** average French homes for a year

LE BRISTOL PARIS

Despite a 9% increase in occupancy, Le Bristol reduced their carbon footprint by 6.2%

They achieved this by reducing both their gas and electricity consumption by over 6%

This saved as much carbon dioxide as planting and growing **1,492** tree seedlings for 10 years



Figure 13: 2019 best practice highlights

Hotspot analysis was completed to highlight areas for improvement in each property.

For example, as shown in Figure 14 (overleaf), electricity consumption at one of the properties remained constant throughout Q4, despite changing occupancy levels. Specifically, in November there was a significant drop in occupancy, but consumption remained the same. Adjusting electricity use to variables such as occupancy could lead to considerable savings, both in terms of consumption and in costs.

5. Commitment 2 - Consume Responsibly

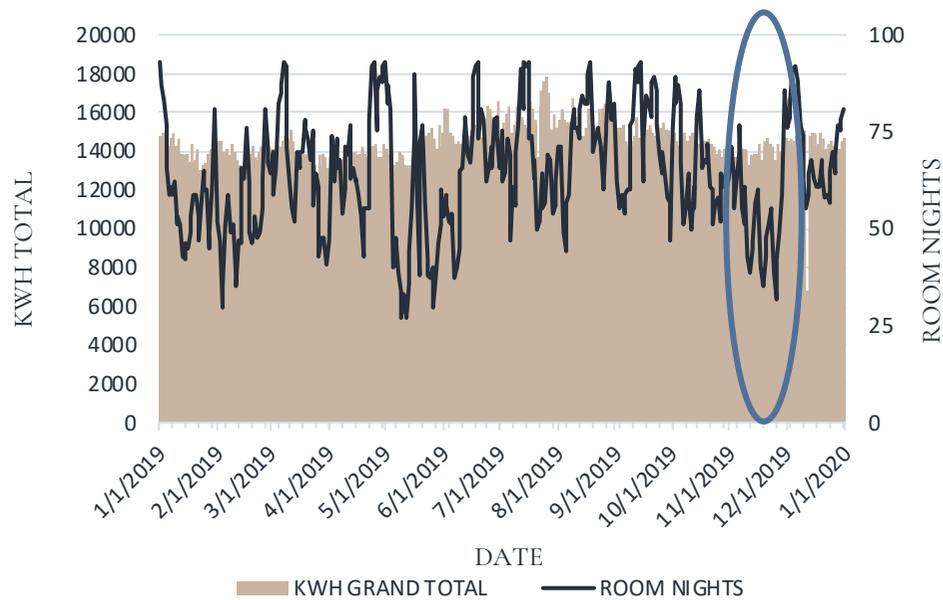


Figure 14: Property electricity consumption

At another property, water use barely dropped during the month that the hotel was closed in September/October (weeks 35 to 40 - Figure 15). This shown data allows Oetker CSR Team to highlight to remind hotels to consider whether their minimum consumption can be reduced further during closures.

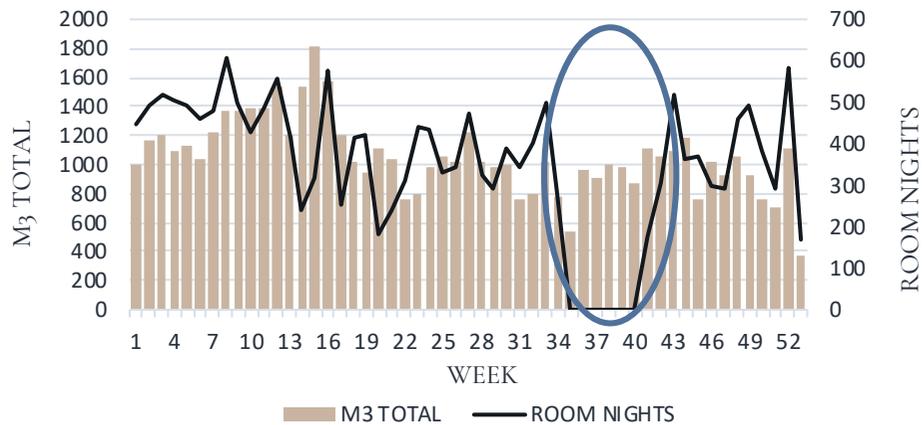


Figure 15: Property water consumption

Oetker Collection has committed to reducing their electricity, gas and water consumption by 10% by the end of 2024 (compared to 2018 levels). 2019 represented their first step towards reaching this target. Figure 16 shows the intermediate target of 1.7% to reaching the final target by the end of 2024. This comparison allows Oetker Collection to evaluate on a yearly basis whether they are on track to meeting the target reduction by 2024.

In 2019, Oetker Collection successfully reduced their energy by more than 1.7% compared to 2018, which is the minimum reduction needed to meet the 2024 target. Water consumption also decreased, but only by 1.0%.

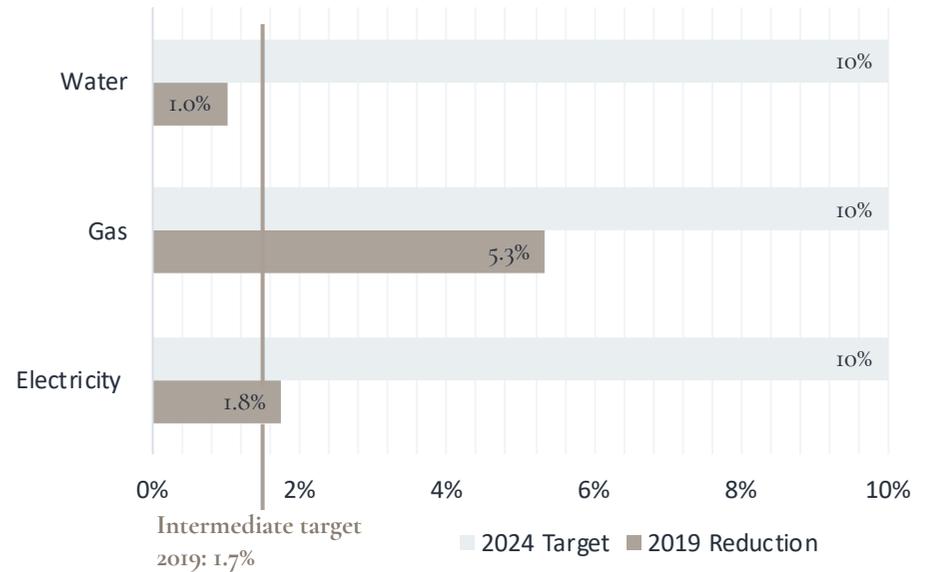


Figure 16: Reductions in 2019 compared to 2024 energy and water targets

Taking into account electricity consumption and fuel/heat use, Oetker Collection's carbon footprint in 2019 was 9,750 tons CO₂e. 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 and district heating, account for 84% of Oetker Collection's emissions. Scope 1 emissions account for 16% and are direct emissions from burning fuel/heat on site. Due to reductions in energy consumption, Oetker Collection's total CO₂ emissions in 2019 have reduced by 3% compared to 2018; equivalent to a per room night emissions reduction of just over 4%.

5. Commitment 2 - Consume Responsibly

Group's CO₂e emissions, grouped by scope can be seen below in Figure 17.



Figure 16: Oetker Collection CO₂ emissions by Scope 2019

To improve resource consumption, Facility Managers, CSR Patrons and Group CSR Team committed to further engage with monthly Con-Serve™ reports. Target meters were set up for each property on Con-Serve™ to help each hotel track their progress against the reduction targets on a monthly basis.



5.3 2019 Waste Assessment

In line with Oetker Collection's commitment to consume responsibly the first waste assessment was carried out in September/October 2019. This assessment acted as the foundation to map out detailed goals and activities on the topic of waste in the upcoming years.

Seven out of the nine properties participated in the survey. The outcomes were presented in a report which was shared with the CSR patrons, as well at management level.

The data obtained shows that waste is managed very differently across the hotels, thus data availability is also variable.

- The waste categories with the highest separation rate (separated at each hotel) are cardboard, glass, fat/oil/grease, batteries and bulbs
- The data availability is the highest for cardboard, glass, plastic and fat/oil/grease

A short analysis for each waste category was presented, highlighting special practices at individual hotels, such as on-site composting at Hotel du Cap-Eden-Roc and Château Saint-Martin. Further insights included:

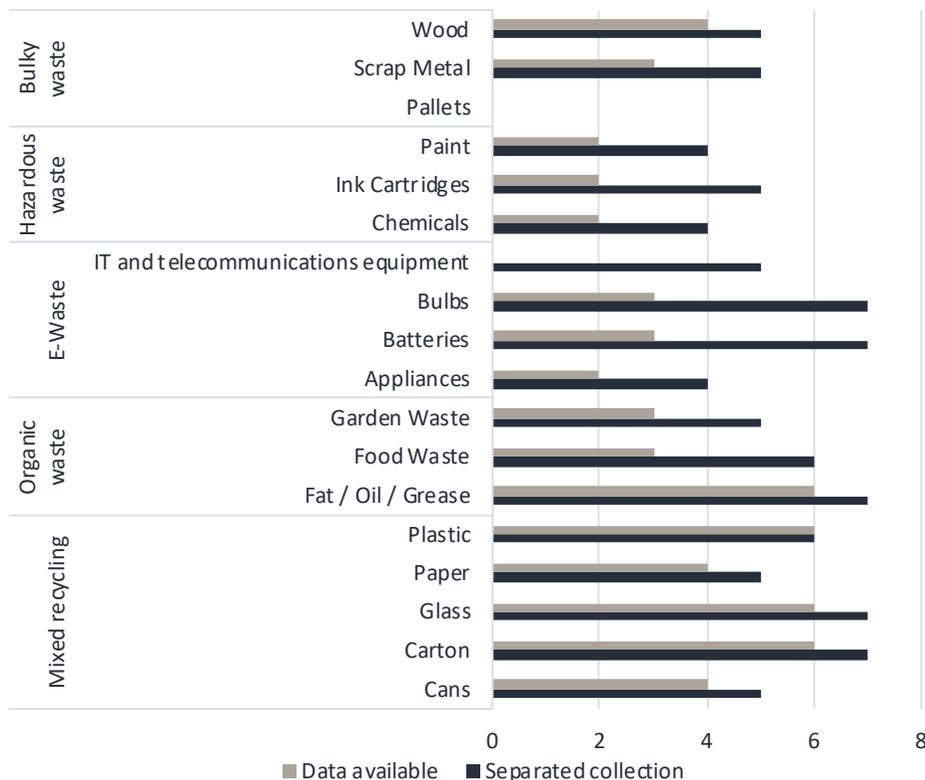
- Waste is usually only separated in the back of house - only two hotels (Hotel du Cap-Eden-Roc, Château Saint-Martin) separate waste in front of house as well
- Measurement of waste is predominantly done by waste contractors (at six out of the seven hotels)
- Most hotels report unusually high waste generation on some occasions, sometimes requiring additional collection. These include: events (reported by three of the hotels; e.g. food waste, glass bottles), refurbishments (e.g. specific waste separation, responsibility for waste management shifted to suppliers), large deliveries (e.g. cardboard)
- With regards to initiatives to reduce/reuse/upcycle waste, the hotels mainly refer to plastic reductions driven through the current CSR Strategy. By the time the waste survey was carried out, all hotels had eliminated plastic cups in staff canteens, and items which have been replaced in most of the hotels were cocktail stirrers and straws.

5. Commitment 2 - Consume Responsibly

The conclusions from this first assessment were as follows:

- Management of waste varies considerably between hotels, also depending on local collection schemes - this gives the opportunity to share best practices
- Waste streams which are currently most widely segregated are mixed recycling & organic waste
- To achieve and measure reduction goals, more consistent waste data will be needed. For this purpose, the CSR Team will collect more consistent data from hotels on a quarterly basis
- For 2020 it was decided to hire a CSR intern at all properties with a key focus to help establish better waste collection systems at the hotels, improve recycling processes and ultimately reduce waste overall

Waste separation and measurement



5.4 Property Actions

BRENNERS PARK-HOTEL & SPA

- Switched to sustainable cleaning products, as well as pure vinegar
- An initiative to reduce paper in individual department(s) was implemented, as well as their first plastic reduction initiatives

CHÂTEAU SAINT-MARTIN & SPA

- Replaced single-use plastic items in hotel rooms with items made out of more sustainable materials (e.g. corn starch, bioplastics or paper)

EDEN ROCK – ST BARTHS

- Opening of the staff the canteen eliminated the need for lunch deliveries in plastic containers
- Installed a regular coffee machine to reduce waste created by Nespresso capsules, as these cannot be recycled on the island
- Are planting local plants during the renovations of the hotel and signed a contract with Biotec – using organic products
- Improvement of infrastructure and equipment during the hotel renovation included water flow restrictors, low flow toilets, aerated shower heads, ceiling fans, LED lights and external wall insulation
- Introduction of biodegradable and compostable capsules for the Nespresso machines in the guest rooms. The coffee is organic and roasted by a family business from Alsace.
- Plastic from the hotel is now burned at the waste processing plant which produces energy to fuel the desalination plant, that provides 1/3 of the fresh water consumed on the island

HOTEL DU CAP-EDEN-ROC

- Replaced single-use plastic items in hotel rooms with items made out of more sustainable materials (e.g. corn starch, bioplastics or paper)
- New tissues used in restaurant and room service “My Drap” are made out of recycled cotton

5. Commitment 2 - Consume Responsibly

L'APOGÉE COURCHEVEL

- Replaced single-use plastic items in hotel rooms with items made out of more sustainable materials (e.g. corn starch, bioplastics or wood)
- Put in place a compost process (further details under Commitment 4)

LE BRISTOL PARIS

- Provides charging stations for electric vehicles
- Installed taps with automatic detection
- Training was provided about waste sorting
- Presence detectors were installed in the offices, locker rooms and showers of staff
- To avoid water losses the water unit for iced water (air conditioning) was replaced by chilled water system
- Foam hulls were added as insulation in the foundry, reducing heat loss
- The CSR team works together with the HR department to include information on CSR during the integration day, e.g. definition of CSR and eco gestures covering sorting, electricity, heating, water, etc.

THE LANESBOROUGH

- Engaged with supplier to order the most eco-friendly cleaning products
- Reusing business cards for regular/repeat guests when they leave these behind, rather than having them going to waste and needing to reprint them for their next stay
- Recycling bin has been put in place for newspapers

PALÁCIO TANGARÁ

- The monthly Con-Serve report was distributed to all ExCo members, and a summary is provided in Direct Line Meetings
- Engaged with their main fish supplier to discuss fish certifications. Ensured that none of the purchased fish is on the red lists, that they are all from line fishing and of a size recommended by IBAMA

- All team members, including newly hired people, received a reusable water bottle to eliminate the use of plastic cups by staff
- Water flow regulators were installed back of house, in locker rooms and public areas
- Implementation of RestoClean, a modern solution for the efficient cleaning of fats and carbonized fats, saving labour, time, water and increasing the lifespan of the equipment
- Daily shutdown of fountains during night hours
- Daily shutdown of AHU in vacant rooms and until two hours prior to check in
- Reduction of condensation water consumption due to a 1 °C increase in chillers' set point

JUMBY BAY ISLAND

- Saved US\$30,000 by reducing plastic
- As well as plastic and aluminium, grey water is also recycled
- The setup of solar panels reached phase 2 out of 3, with the solar panels installed but not functioning to full capacity yet
- 80 new guest bicycles have been ordered (2 per guest room)
- Monitors are used for morning and other meetings



6. Commitment 3 - Ensure Environmental Awareness

Principles:

- 3.1 Provide the necessary framework and training to operate responsibly at each hotel
- 3.2 Encourage our stakeholder to engage with our vision for a sustainable future
- 3.3 Create channels and messages for CSR communication

Alignment to SDGs :

Material topics addressed:



Guest Engagement & Satisfaction



6.1 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. Heads of department are then provided with internal tests and action plans tracked throughout the year to ensure compliance.

LQA global branding ranking for 2019 (Figure 18) demonstrates Oetker Collection's continuous commitment to guaranteeing an impeccable and responsible service. Reaching a score of 91% in 2019, Oetker Collection remained the leading brand in its competitor set, 7% above the competitor set average. In fact, 24 out of the 25 departments scored above average.

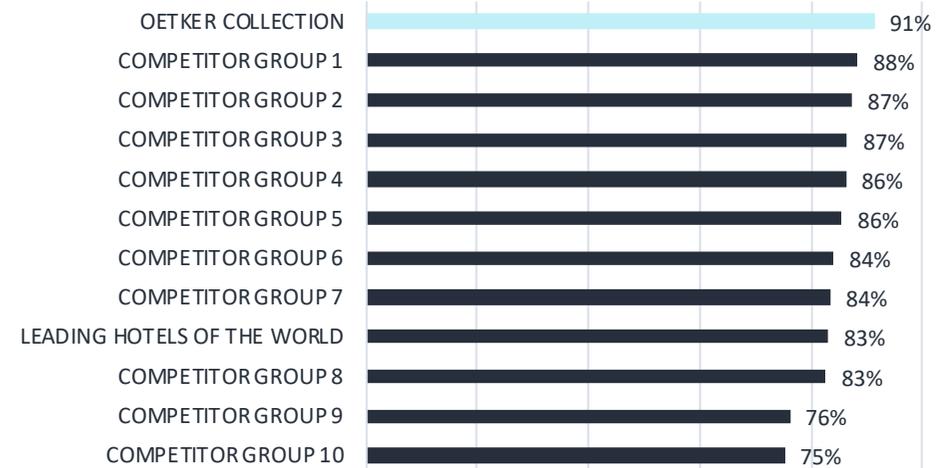


Figure 18: LQA 2019 global brand ranking

Brands Included:

BELMOND	MANDARIN ORIENTAL
FAIRMONT HOTELS	OETKER COLLECTION
FOUR SEASONS	RAFFLES
JUMEIRAH	ROCCO FORTE HOTELS
KEMPINSKI HOTELS	ROSEWOOD HOTELS
LEADING HOTELS OF THE WORLD	SHANGRI-LA

Competitor groups are listed in alphabetical order here, and do not correlate to the ranking order in the displayed competitor set.

6. Commitment 3 - Ensure Environmental Awareness

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 Oetker Collection, the participant has the possibility to send an anonymous message via the Compliance Hotline System to the Compliance Representatives (<https://www.oetkercollection.com/compliance/>).

Each hotel has a Compliance Coordinator who reports to the Group Coordinator (during 2019: Dr Timo Gruenert, CFO of Oetker Collection). Incidences are then reported further to the Corporate Compliance Committee of the Dr. August Oetker KG and the Advisory Board of the Dr. August Oetker KG. 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.

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. The sensitisation of the management team leads to proactive prevention of anti-corruption

6.2 Guest & Staff Communication

As stated in Principle 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 Principle 3.2. through CSR communication and activities.

Over the year of 2019 regular communication around all CSR related initiatives at each of the properties has been integrated into the various channels of communications, both internally and externally. These are:

- Social media channels (Instagram, Facebook, LinkedIn)
- Website
- Online Blog (Eden Being) with its own section on CSR, called '50 Shades of Green'
- PR – dissemination of relevant press releases to all media contacts of the hotel group (eg. Le Bristol – A green scene, June 2019)
- Travel Trade- information newsletter, called La Gazette, with updates on all hotels (including CSR information) is sent to all travel agents and wholesalers every 3 months
- Eden Being printed magazine published quarterly,
- PearlNet by Workplace- the group internal communication platform used by all staff and management. Each hotel as a dedicated CSR channel with their profile and there is a group wide CSR channel, called GreenPearls



6. Commitment 3 - Ensure Environmental Awareness

A video message from the group CEO was produced to introduce the CSR commitments and is live to see on the website.

Group CSR Team represented Oetker Collection at following events:

- 1 - Austrian World Summit 2019 with relevant Tourism Breakout Session- May 2019
- 2 - Mediterranean Resort & Hotel Conference (MRH) Athens October 2019

Group CSR Team's work for Oetker Collection was also featured in following publications:

- Financial Times- Special Edition, February 2019
- IM Magazine- Spring 2019
- Bunte Magazine- August 2019
- Gala Magazine- August 2019



6.3 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 the 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.

Listed for the 2019 Green Pearl Award is Palácio Tangará.

6. Commitment 3 - Ensure Environmental Awareness

HOTEL DU CAP-EDEN-ROC

- CSR training is provided at the beginning of the season, including a presentation of the CSR team
- Employees could donate blood during working hours
- CSR Strategy was communicated to all managers, main objectives are highlighted during employees CSR training and are included in the “staff guide”
- Objective and key results (OKR) strategy included three CSR OKRs: Creating one new sustainable offer by each service to our customers; 0% plastic: removing or replacing plastic throughout the hotel; 100% of hoteliers getting involved in the protection of the environment

CHÂTEAU SAINT-MARTIN & SPA

- The hotel's CSR Strategy was communicated to the staff through a staff guide which was sent by email at the beginning of the season
- Car sharing was organised via a Facebook page

L'APOGÉE COURCHEVEL

- The hotel's CSR Strategy was communicated to the staff at the beginning of the season through various channels (e-mail, pearl net and the staff guide)

THE LANESBOROUGH

- Offered a Raw Menu at the staff's Celeste Restaurant for Earth Hour
- Employees were encouraged to participate at the Bike Week in Hyde Park
- Green Pearls are presented within the induction programme
- Rewards were given to employees who drove together or cycled to work over Christmas/Boxing day (London transport does not run over these days)

BRENNERS PARK-HOTEL & SPA

- Trained kitchen staff to use local food sources, and to increase awareness and responsibility around nourishment

PALÁCIO TANGARÁ

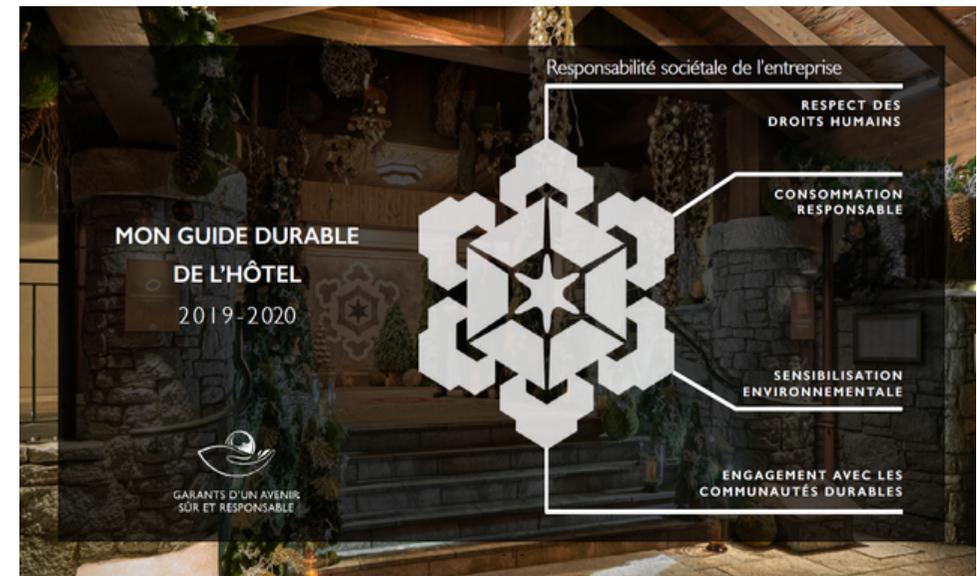
- Introduced a question on Performance Evaluation to guarantee that all team members have CSR awareness

LE BRISTOL PARIS

- A challenge was organised during the sustainable development week, calling for innovative, creative and feasible actions to be taken around CSR (90 ideas have been received)

EDEN ROCK – ST BARTHS

- Eden Rock – St Barths started farming - an on-site indoor hydroponic growing system was constructed to produce a large portion of the greens that the hotel serves at its restaurant – thyme, rosemary, coriander, basil, chilis, mint and cherry tomatoes.
- Had staff participating in the traditional ‘Gustavia Loppet’ – Race of Gustavia – a race which serves as a reminder that St Barths was under Swedish rule for over 100 years (1784-1878) before being returned to France. On Sunday 3rd November, the bravest participants took part in a 5 or 10km race, while motivated walkers embarked on a 8km itinerary.



6. Commitment 3 - Ensure Environmental Awareness

6.4 Guest Activities

Each property offers many staff and guest CSR activities. In 2019, the Group CSR Team developed its second 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 kinds of events as fixed part of operations and integral to the group's communication activities.

Earth Hour 2019 was celebrated in all Oetker Collection hotels, each with special events.

LE BRISTOL PARIS

- Several actions were taken during the sustainable development week
 - Opened a PopUp Store in collaboration with gOOOders, an environmentally and socially responsible lifestyle brand
 - Offered electric bikes for use by guests
 - Offered a 100% eco-friendly face treatment at their Spa
- Guests asked less and less frequently to have their towels and sheets changed daily

THE LANESBOROUGH

- Established a Raw Menu on Earth Hour for guests

EDEN ROCK - ST BARTHS

- Villa rental guests were offered hand-made marmalade for breakfast, made by the pastry chef

PALÁCIO TANGARÁ

- 100% of guests participated in the choice to change sheets at a two-day interval in the second quarter
- Burle Talks were organised on the topic "Bee or not to be"

HOTEL DU CAP-EDEN-ROC

- New changing linen cards are now used at the Hotel du Cap-Eden-Roc so that guests have to 'opt in' in order to receive a change of bed linen every day.
- The Eden Being Boutique and Spa sell various sustainable products such as shorts from recycled plastic, clothes made with natural dyes by women from Brazil's favelas, and 300 pairs of limited edition glasses 100% made in La Chaux-du-Dombief (France) – each pair sold allows to collect and distribute 10 pairs in Nepal
- Similar to Château Saint-Martin, a beekeeper came to their hotel, to raise their employees' awareness and lead a number of honey-based activities.
- The loyalty of their oldest customers is rewarded with the opportunity to plant pine trees in their honour. If desired, an engraved plaque with their initials and the year of their first stay at the hotel is affixed. This approach is part of the hotel's pine replanting management plan.
- A regular guest joined the team for an eco-citizen morning

CHÂTEAU SAINT-MARTIN & SPA

- Biodiversity map is available in each room
- Olive oil was made from their own trees in with the association "Renouer" - 1,161kg were harvested and the oil is offered to loyal guests
- A beekeeper came to their hotel to raise employee awareness. A honey-based menu was developed by the chef of the staff restaurant, and employees could participate in a hive workshop, a quiz on bees and honey tasting. In addition, guests were offered different honeys at the gastronomic restaurant during breakfast and the honey from the hotel's beehives was used in a dessert on the spring menu
- In September, a beehive workshop was organised for guests



7. Commitment 4 - Engage with Sustainable Communities

Principles:

- 4.1 Favour local producers who guarantee the rich heritage of our region
- 4.2 Commit alongside our partners in projects that are linked to the principles we defend
- 4.3 Support local communities engaged in the protection of environmental and social project

Alignment to SDGs:



Material topics addressed:

Economic Growth

7.1 Sustainable Purchasing

Oetker Collection supply chain is dependent on hotel and customers' requirements as shown in Figure 19. Oetker Collection main groups of purchase include: food and beverage, 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.

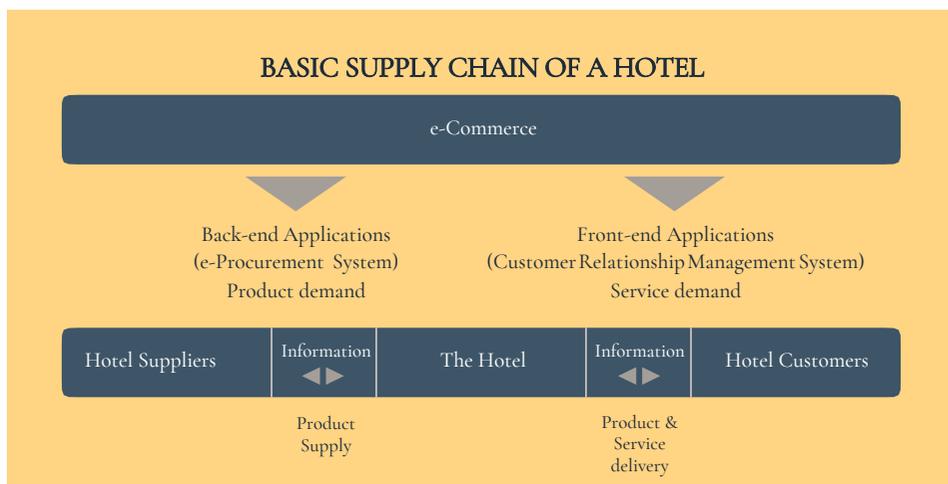


Figure 19: Oetker Collection supply chain

From 2016, about 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.



7. Commitment 4 - Engage with Sustainable Communities

Further to CSR screening, the Oetker Collection CSR Team has prepared a Responsible Purchasing Charter to support the Oetker Collection hotels with sustainable purchasing choices. It is important for Oetker Collection suppliers to be aware of the 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 the Oetker Collection hotels with preferred vendors.

A questionnaire was developed in 2017 to ensure suppliers were aware of the Oetker Collection CSR Strategy and to monitor supplier's sustainability performance. The survey is conducted on a yearly basis. In 2017, the questionnaire was only sent to 30 Oetker Collection vendors; in 2018 and 2019, it was also sent to individual hotel suppliers. Compared to 2018, the response rate nearly doubled in 2019, with a total of 433 suppliers completing the questionnaire. 14% of the respondents supply the entire Oetker Group, with the remainder supplying individual Oetker Collection properties. The distribution of respondents per survey was as follows:

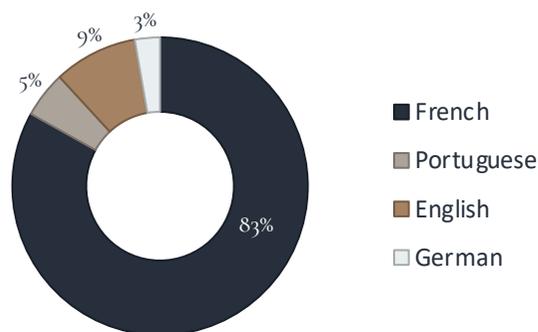


Figure 20: Distribution of Supplier Questionnaire responses

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. 72% of suppliers source their materials and/or employees locally and, therefore, support the development of the local region (defined as a 200km radius) (compared to 60% in 2018).

When asked how they do this, common responses were;

- We purchase from local suppliers
- We partner with local companies
- We are in proximity of the hotel

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:

- Sustainability related reporting, partnerships and certifications among suppliers increased significantly compared to 2018. Especially reports became more common (change of 10 percentage points), such as e.g. reports on social responsibility, sustainable development, certification criteria, internal monitoring, and environmental assessment reports (e.g. for waste).
- Positive results from new projects have only been experienced by 13% of the suppliers which marks a slight decline since 2018.
- About a quarter of the suppliers made other progress in terms of sustainable development, predominantly in the areas of waste reduction, material use and recycling.

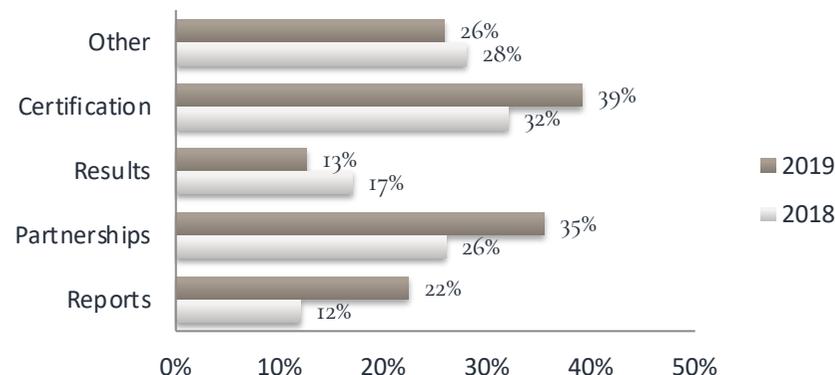


Figure 21: Supplier's progress in terms of sustainable development

7. Commitment 4 - Engage with Sustainable Communities

In line with objective 2.4.2 the Purchasing Team will continue to collect and update supplier information to increase the transparency of the supply chain. Suppliers should make their sustainability reports and/or supporting information available to the Purchasing Team.

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 suppliers' sustainability performance.

Group CSR Team also reviewed suppliers' awareness of the Oetker Collection Responsible Purchasing Charter and Oetker Code of Conduct, with the following outcomes in 2019:

- 62% of suppliers have a non-discrimination policy in place
- Approximately a third of the responding suppliers are aware of the Oetker Collections Anti-Bribery Policy or have their own Anti-Bribery Program, including control of business relationships, ethical codes of conduct, internal control programs, training and orientation, and zero tolerance policies.

The goal for 2020 is to have 100% of suppliers being aware of the Oetker Collection Responsible Purchasing Charter. Whilst the situation has improved since 2018, distribution of Responsible Purchasing Charter by Oetker Collection Purchasing Team and hotels themselves needs to be assured for the awareness to reach 100%.

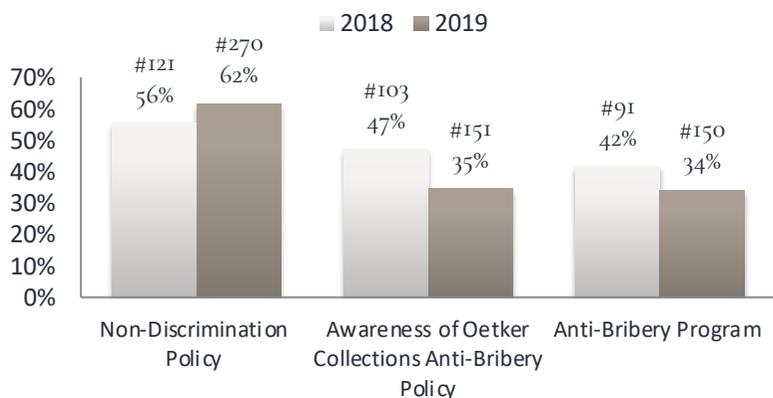


Figure 22: Suppliers' awareness

In 2019, suppliers were also asked whether they have policies in place on gender equality, and following responses were gathered:

- 33% of suppliers have a policy to eliminate all forms of violence against all women & girls in public and private spheres, including trafficking and sexual and other types of exploitation
- 13% of suppliers have other initiatives to further gender equality

Additionally, the Group CSR Team screened suppliers' environmental initiatives. Compared to the survey results in 2018, almost all types of environmental initiatives have become more prevalent amongst all suppliers. In summary:

- Suppliers were most concerned with recycling and/or reducing paper use, recycling and/or reusing waste, water savings, and energy savings – this trend has continued since last year
- Packaging optimisation gained most momentum amongst all the supplier since 2018
- Suppliers were least concerned with producing environmentally friendly eco-labelled cosmetic and maintenance products and antibiotic free food products

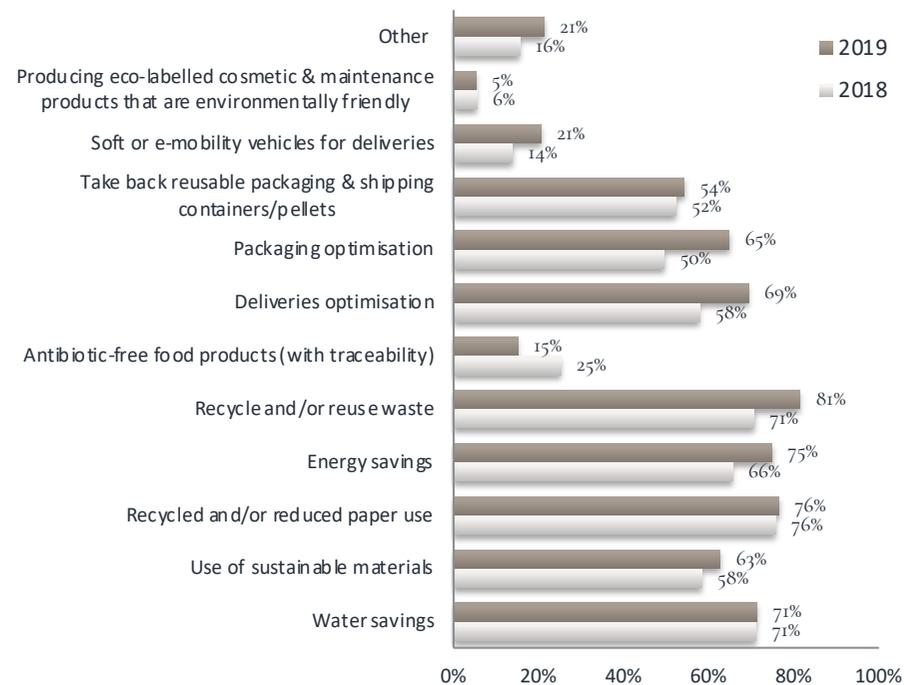


Figure 23: Environmental Initiatives favoured by suppliers

7. Commitment 4 - Engage with Sustainable Communities

In 2020, the CSR team plans to make use of suppliers' interest to improve waste management. Therefore, the survey results will be shared with CSR interns to tap into potential synergies.

In 2019, the suppliers were also asked to give insight on their plans to reduce single-use plastics, in particular when it comes to the packaging of their products. Approximately a third have a plan to reduce the use of plastic or are working on solutions. In total 77% of suppliers are taking or working on actions against single-use plastics.

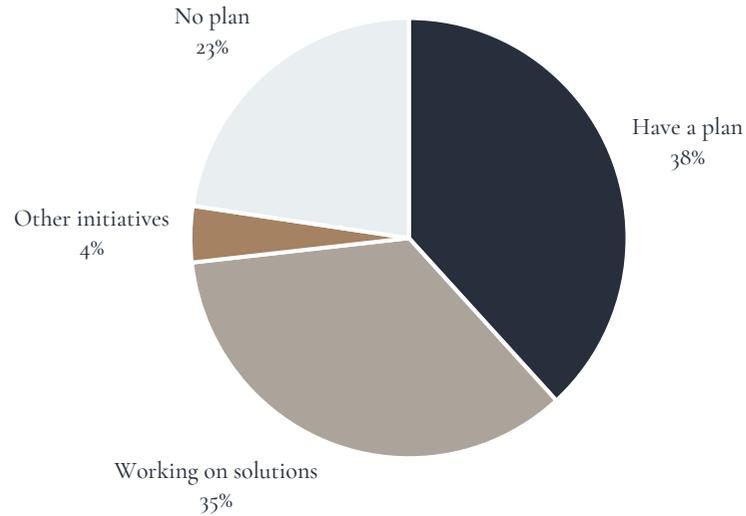


Figure 24: Suppliers' plans to reduce single-use plastics

These figures show the growing importance of the topic amongst Oetker Collection's suppliers. The purchasing teams are therefore advised to make use of this momentum and find further replacements for single-use plastic items in line with the objective 2.3.1. on reduction of solid waste.



7. Commitment 4 - Engage with Sustainable Communities

7.2 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 2019, 9 Oetker Collection properties raised a total of €60,103 and worked with various local organisations and 19 different charities.

BRENNERS PARK-HOTEL & SPA

- Local art is displayed at the Fritz and Felix showing traditional costumes of the region
- 20,000€ worth of donations were collected for the “Weihnachtspäckchenkonvoi” (Convoy of Christmas gifts), which was also advertised through social media



PALÁCIO TANGARÁ

- Work with CAMP (Non-Governmental Organization that acts as a vocational school for training in various areas in special hotel industry); Associação Paraisópolis (Neighbourhood Community Association); and Paraisópolis Philharmonic Orchestra
- Donated 1,072 uniform parts to Associação Resplendor/Casa de Apoio aos Portadores de HIV (Support Centre for HIV positive people)
- Purchases ceramics made by local artists
- In partnership with Mbee, a hive box was installed at Palácio Tangará. The local bee “Jataí” produces exquisite honey- considered one the best honeys in the world
- Donations through the Winter Cloth Campaign to Salvation Army and Associação Paraisópolis (Neighbourhood Community)
- Other donations such as trousseaus, uniforms (which are reformed by them) and leftovers amenities are donated to the Cruz Verde Association (taking care of people with cerebral palsy)
- As their Christmas action, the staff chose to support the day care centre of the association Madre Teresa de Calcutá CEI. Gifts were given to each of the children and a video created from the action (see Standard Highlights)

EDEN ROCK – ST BARTHS

- Worked with Island Nature St Barth Experience; Eden Reef project; St Barth half marathon; the renovation of the St Jean pond; and the St Barth bucket regatta A local painter was invited to paint on the beach front during construction
- Eden Rock - St Barths came to London with an exclusive pop-up at The Lanesborough; for each iconic Frozé cocktail, £1 was donated to the charity Island Nature St Barth Experience which played a vital role in the emergency relief effort in St Barths following Hurricane Irma
- New: support the local Sargasse Project which aims to turn sargassum seaweed into biodegradable paper and cardboard
- Five divers of Eden Rock-St-Barths accepted the challenge of their diving partner to produce a 12 hour diving relay for a TV téléthon / French fund-raising event
- As a loyal sponsor of the St Barth Cata-Cup regatta, the race was named the “Eden Rock Villa Rental prize”
- For the reopening of Eden Rock-St Barths skilled local artists and shoe beautifier designed custom hand-painted sneakers with specific illustration for each department

7. Commitment 4 - Engage with Sustainable Communities

HOTEL DU CAP-EDEN-ROC

- A wide range of charities were supported including the Red Cross and Secours Populaire (amenities, slippers, clothing), Unisoap, France Cancer (collection of corks for research) , Abio6 (collection of old clothes for recycling)
- For the organisation Espace Mer et Littoral, the protection of the Mediterranean Sea turtle “Caretta Caretta”, 29,376 € were collected during Q2 and Q3 and 491 turtles adopted
- The Scientific Council of “Iles de Lérins” was supported with a donation of 2,500€ to research against pollution in the Mediterranean Sea
- A partnership was signed with the Antibes Footvolley Team

CHÂTEAU SAINT-MARTIN & SPA

- Worked with various charities such as The Red Cross and Unisoap
- For the Bird Protection League a total of 5,570€ were raised during Q1 and Q2, to protect the “Chevêche Athena” owl; 106 owls were adopted.

THE LANESBOROUGH

- In Q3, 19 full bags and a few larger single items (approx. total of 100kg) were donated to The Dogs Trust (dog welfare charity) and Crisis UK (charity for homeless people)

LE BRISTOL PARIS

- Supported various charities such as the Red Cross, Emmaüs, Les Chapeaux de Martine, Save the Children and Coeur2Bouchons. Donations included materials, objects, gifts or free nights and dinners at the hotel
- Donated dinner for two guests as a prize at the annual Gala event held to raise money for the Alzheimer Research Foundation
- Staff at Le Bristol took part in the 2019 Odyssea Run in Paris. They joined 36,000 other participants in the run, which aimed to raise funds for fighting breast cancer.
- New in Q3: Support of the association Pascal Mathieu Mont Blanc through the collection of sunglasses for people living in the Himalayas
- Toys were collected for a Christmas action, five dinners and five free nights at the hotel were donated for charity galas and tombola events
- A fifth charity is supported: Stylothon which collects used pens for a telethon.

JUMBY BAY ISLAND

- Provided various examples of artists they work with such as for candle holders, welcome and post cards, palm tree weaver baskets or sea view farm pottery
- During the Festive season, the Food and Beverage team donated food to those in need on mainland Antigua
- Sip and Paint event was held with local artists over Festive period

L'APOGÉE COURCHEVEL

- Worked with the Red Cross, Clean the World and France Cancer charity
- Raised donations of 4,024€ for the Vanoise National Park
- L'Apogée Courchevel is the first hotel at the ski resort to put in place a compost process in partnership with Courchevel city hall. The kitchen and pastry department add fruits and vegetables peels to the process daily. The compost will be used by Courchevel during springtime for their green spaces (see Standard Highlights)
- L'Apogée Courchevel work with “Les caves d'affinages de Savoie”, who are master cheesemakers. At the bar local whiskey and beer are offered



8. 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 2020 and future developments.

Objectives to be achieved by Oetker Collection CSR Team, HR Team, Purchasing Team and CSR Patrons were set within the 2019 Strategy. 11 objectives were set for 2020 and will be assessed in the next CSR report.

COMMITMENT 1: RESPECT HUMAN RIGHTS

- 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 Talentsoft, 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



COMMITMENT 2: CONSUME RESPONSIBLY

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

8. Moving Forward

COMMITMENT 3: ENSURE ENVIRONMENTAL AWARENESS

- 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 group Social Media Planner for PearlNet posts



COMMITMENT 4: ENGAGE WITH SUSTAINABLE COMMUNITIES

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

9. Appendix

9.1 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
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	a. Markets served, including: 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	a. Scale of the organization, including: 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 4.1 HR Key Figures	18-19
102 – 9	Supply chain	Refer to Section 7.1 Sustainable Purchasing	41-42
102 – 10	Significant changes to the organization and its supply chain	a. Significant changes to the organization's size, structure, ownership, or supply chain, including: i. Refer to section 1.2 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 Introduction, Section 1.4 Reporting Structure and Content, Section 2.0 Corporate Social Responsibility, Section 4.2 Human Rights and Labour Laws	3/ 8 ff./ 22 ff.
102 – 13	Membership of associations	a. The Leading Hotels of the World	3

9. Appendix

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE / REPORT LOCATION	PAGE
102 – 14	Statement from senior decision-maker	Refer to Section 1.5 CEO's Foreword	4
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	8
102 – 18	Governance structure	a & b. Executive Committee Of Oetker Collection	20-22
102 – 40	List of stakeholder groups	Refer to section 2.3 First CSR Strategy	9
102 – 41	Collective bargaining agreements	100% of Oetker Collection employees are covered by collective bargaining agreements.	19
102 – 42	Identifying and selecting stakeholders	Refer to section 2.3 First CSR Strategy	9 ff.
102 – 43	Approach to stakeholder engagement	Refer to section 2.2 CSR Governance	8 ff.
102 – 44	Key topics and concerns raised	Refer to Section 4.2 Human Rights and Labour Laws, Section 5.1 Organization Overview, Section 6.1 Quality & Fair Operating Practices	19ff./ 25 ff./ 31 ff.
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 1.2 Reference Framework and Section 1.4 Reporting Structure and Content	3
102 – 47	List of material topics	Refer to Section 2.3 First CSR Strategy	9 ff.
102 – 48	Restatements of information	Refer to Section 5.2 Environmental Monitoring	25 ff.

9. Appendix

GRI DISCLOSURE NUMBER	DISCLOSURE TITLE	DISCLOSURE / REPORT LOCATION	PAGE
102 – 49	Changes in reporting	Chapter 5.2 Environmental Monitoring is based on 8 Oetker hotels that were open during both 2018 and 2019, 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-November 2019 due to damage from Hurricane Irma.	26 ff.
102 – 50	Reporting period	Refer to Section 1.2 Reference Framework	3
102 – 51	Date of most recent report	Corporate Sustainability Report 2018 (published July 2019)	–
102 – 52	Reporting cycle	Refer to Section 1.2 Reference Framework	3
102 – 53	Contact point for questions regarding the report	Xenia zu Hohenlohe, considerategroup.com	–
102 – 54	Claims of reporting in accordance with the GRI Standards	Refer to Section 1.4 Reporting structure and content	3
102 – 55	GRI content index	Refer to Section 9.1 GRI Index	45-47
102 – 56	External assurance	For the 2019 Oetker Collection Group report external assurance was not requested, however for future reports Oetker Collection will evaluate practice.	–
302 – 4	External assurance	Refer to Section 5.2 Environmental Monitoring	25 ff.
305 – 5	Reduction of energy consumption	Refer to Section 5.2 Environmental Monitoring	25 ff.
308 – 1	Reduction of GHG emissions	Refer to Section 7.1 Sustainable Purchasing	41-42

9. Appendix

9.2 Further Information

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

For further information please contact, Xenia zu Hohenlohe
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