OETKER COLLECTION
Masterpiece Hotels

Corporate Sustainability Report January 2021 – March 2022
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1. Introduction

1.1 About this report

The 2021/22 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.

1.2 Reference Framework

In 2021, the CSR reporting year was changed from the original period of January - December to April - March, which corresponds to the operation and seasons of the hotels. Due to the transition to the new reporting year, this report covers the period 1 January 2021 to 31 March 2022. The report is provided on an annual basis. It includes information from the 10 Oetker Collection masterpiece hotels: 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, Palácio Tangará and The Woodward Geneva.

The Woodward Geneva opened in early autumn of 2021 and actions and progress towards the CSR Strategy will therefore only be fully reported from April 2022. Another new hotel has joined the Oetker Collection (opening data tbc): La Palma – Capri, Italy. As this property has not been opened yet, it has not been included in this report.

1.3 Organisation Overview

GROUP COMPANY COVERED BY THIS CSR REPORT: Oetker Collection

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

MANAGEMENT: Oetker Hotel Management Company GmbH (OHMC), registered in Germany, manages Oetker Collection

HEADQUARTERS: Baden-Baden, Germany

EMPLOYEES: 2447

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) and Geneva (Switzerland, from 2021). Customers are individuals from worldwide markets.

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

REVENUE: Reported annual business revenue in 2021: 211 M€

ASSOCIATIONS: 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 the Oetker Collection. These are detailed in section 1.8.
1. Introduction

1.4 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 focuses 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.

1.5 Company Structure

In November 2021, the Oetker Group as the owner of Oetker Hotel Management Company GmbH as well as four of the hotel properties was split into two entities, the Dr. August Oetker KG and the Geschwister Oetker Beteiligungen KG (GOB).

Oetker Collection (OHMC) became a member of Geschwister Oetker Beteiligungen KG. With a turnover of almost 2 billion euros and more than eight thousand employees, Geschwister Oetker combines the values of a respected family business with dynamic growth ambitions.
1.6 CEO’s Foreword

Indeed, throughout all these challenges, our focus has remained on our people. We know it has also been a difficult time for our global team members, being temporarily disconnected from our hotels and colleagues and being asked to display the highest level of flexibility during restricted open times. As a company, we faced the consequential decline in revenues. Our priority was, however, to navigate all these substantial issues in the best way possible for our teams. All those activities are in strong alignment with our CSR Commitment to Human Rights.

At the time of writing this foreword, the next major humanitarian crisis continues to evolve in the Ukraine, which poses very different challenges for us. We are very grateful that our owners – the Geschwister Oetker Beteiligungen KG – have donated a significant amount for UNICEF and Welthungerhilfe to support those suffering.

Regardless of these crises, climate change and our own CO₂ emissions have become a key priority of our sustainability actions. Our CSR teams spent a lot of time in 2021 establishing a baseline for all our properties, in order to start setting more targeted action plans to achieve our reduction goals over the coming years. We are on track to increase our efforts with individual CO₂ reduction plans for each of our hotels and establish an investment project to fight climate change. All of which continuously plays into our commitment to responsible consumption.

2021 also saw a new addition to the portfolio, namely The Woodward in Geneva, where we were able to implement sustainable initiatives upon opening. The hotel’s special Food & Beverage concept, to focus primarily on regional produce, has proven to be a huge success with the local community and has quickly established itself as a beacon for sustainable dining in Geneva. The Woodward is therefore a prime example of how our second UNGC commitment to “Consume Responsibly” has positioned itself as a core unique selling point at this beautiful property. Equally the hotel is already part of Geneva’s new climate friendly energy scheme, whereby all cooling and heating for buildings are provided through a thermal network linked to the Lake of Geneva. This avoids large amounts of harmful CO₂ emissions generated by conventional air-conditioning or heating systems.

As we look forward to hopefully a normal operating year for all of 2022, to welcoming many of our loyal guests back and greeting new ones at our Masterpiece Hotels, we will strive to continuously involve them and our teams in our sustainability endeavours.

This report is a great tribute to the dedicated talent within our Collection who ensure all sustainability efforts are continuously implemented. I hope it informs and inspires all.

Dr. Timo Gruenert
Chief Executive Officer
1. Introduction

1.7 Oetker Collection Profile

About the Company

Oetker Collection hotels are true masterpieces located in the world’s most desirable destinations. Each property is a landmark and a timeless icon of elegance. With deep devotion to local culture and community, the hotels preserve a tradition of legendary European hospitality and genuine family spirit that began in 1872.

About Oetker Collection’s 10 luxury hotels

**L’APOGÉE COURCHEVEL** – Nestled into Courchevel 1850’s prettiest peak with breathtaking Alpine views, the stylish and contemporary ski chalet boasts cosy warmth and endless adventures at its doorstep.

**BRENNERS PARK-HOTEL & SPA** – A historic icon in the heart of Germany’s beloved Baden-Baden spa city, set within its own private park just a short drive from the Black Forest Mountains.

**LE BRISTOL PARIS** – The Parisian Maison on Rue du Faubourg Saint-Honoré, home to Michelin starred gastronomy and authentic French art de vivre.

**CHÂTEAU SAINT-MARTIN & SPA** – Set in the enchanting hilltops of Vence, with breathtaking views over the French Riviera, where romance comes in the form of Michelin starred dining and authentic Provençal charm.

**EDEN ROCK – ST BARTHS** – Standing upon a rocky promontory overlooking St Jean Bay, the beloved home-from-home is the original icon of St Barths luxury and leisure, completely renovated for modern sensibility.

**HOTEL DU CAP-EDEN-ROC** – Perched on the tip of Cap d’Antibes for over 150 years, the Grande Dame is the birthplace of French Riviera glamour and a magical hideaway for the contemporary traveller.

**JUMBY BAY ISL AND** – Located just 10 minutes off the coast of Antigua and reachable only by boat, carefully preserved nature and a joyful spirit make the private island an unparalleled destination.

**THE LANESBOROUGH** – Presiding over Hyde Park Corner in the very heart of the British capital, the historic hotel’s butler service, modern British dining and afternoon tea unite the best of London life under one roof.

**PALÁCIO TANGARÁ** - Boasting São Paulo’s most coveted address surrounded by the tropical foliage of Burle Marx Park, the contemporary palace is a peaceful retreat within Brazil’s economic and cultural capital.

**THE WOODWARD GENEVA** - The Woodward is an all-suite hotel located on the shore of Lake Geneva with stunning views and opulent interiors exquisitely imagined by architect Pierre-Yves Rochon.

The opening of one more property is planned, see 1.2 Reference Framework.
## 1.8 Awards, Distinctions & Certifications

Many more awards were won by the hotels (see below), and Restaurant Le Saint Martin (Château Saint-Martin & Spa), Epicure and 114 Faubourg (Le Bristol) kept their Michelin Stars.

<table>
<thead>
<tr>
<th>Award / Distinction</th>
<th>Category</th>
<th>Hotel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michelin Star</td>
<td>One Michelin Star</td>
<td>Hotel du Cap-Eden-Roc, Louroc</td>
</tr>
<tr>
<td>Luxe Award by Forbes France</td>
<td>Hotellerie</td>
<td>Le Bristol</td>
</tr>
<tr>
<td>Condé Nast Traveler</td>
<td>Gold list 2021 – European Spa</td>
<td>The Woodward</td>
</tr>
<tr>
<td>Condé Nast Traveler</td>
<td>Gold list 2021 - The Best Hotels and Resorts in the World &amp; Europe and the UK / US, Canada and Caribbean</td>
<td>Hotel du Cap-Eden Roc; Le Bristol; Eden Rock</td>
</tr>
</tbody>
</table>

### Us. News & Report – Gold Badge Awards

<table>
<thead>
<tr>
<th>Award / Distinction</th>
<th>Category</th>
<th>Hotel</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1 Hotel in Paris</td>
<td>Le Bristol</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in France</td>
<td>Eden Rock</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in Europe</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in St Barths, #1 Hotel in the Caribbean</td>
<td>Hotel du Cap-Eden Roc</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in Antibes, #5 Hotel in France</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#2 Hotel in Antigua, #20 Hotel in the Caribbean</td>
<td>The Lanesborough</td>
<td></td>
</tr>
<tr>
<td>#3 Hotel in London, #3 Hotel in England</td>
<td>Brenners Park Hotel &amp; Spa</td>
<td></td>
</tr>
<tr>
<td>Gold badge Award</td>
<td>Château Saint-Martin</td>
<td></td>
</tr>
<tr>
<td>Gold badge Award</td>
<td>L’Apogée</td>
<td></td>
</tr>
</tbody>
</table>

### World Spa Awards

<table>
<thead>
<tr>
<th>Award / Distinction</th>
<th>Category</th>
<th>Hotel</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1 Hotel in Paris</td>
<td>Le Bristol</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in France</td>
<td>Eden Rock</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in Europe</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in St Barths, #1 Hotel in the Caribbean</td>
<td>Hotel du Cap-Eden Roc</td>
<td></td>
</tr>
<tr>
<td>#1 Hotel in Antibes, #5 Hotel in France</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#2 Hotel in Antigua, #20 Hotel in the Caribbean</td>
<td>The Lanesborough</td>
<td></td>
</tr>
<tr>
<td>#3 Hotel in London, #3 Hotel in England</td>
<td>Brenners Park Hotel &amp; Spa</td>
<td></td>
</tr>
<tr>
<td>Gold badge Award</td>
<td>Château Saint-Martin</td>
<td></td>
</tr>
<tr>
<td>Gold badge Award</td>
<td>L’Apogée</td>
<td></td>
</tr>
</tbody>
</table>

### Travel + Leisure World’s Best Awards

<table>
<thead>
<tr>
<th>Award / Distinction</th>
<th>Category</th>
<th>Hotel</th>
</tr>
</thead>
<tbody>
<tr>
<td>#80 The Top 100 Hotels in the World</td>
<td>Le Bristol Paris</td>
<td></td>
</tr>
<tr>
<td>#4 The Top 10 Hotels in Paris</td>
<td>Hotel du Cap-Eden-Roc, Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#12 The Top 15 European City Hotels</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#5 The Top 5 Resort Hotels in France</td>
<td>Le Bristol Paris</td>
<td></td>
</tr>
<tr>
<td>#41 The Top 100 Hotels in the World</td>
<td>Château Saint-Martin &amp; Spa, The Woodward, Hotel du Cap-Eden Roc, Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#6 The Top 15 European City Hotels</td>
<td>Le Bristol Paris</td>
<td></td>
</tr>
<tr>
<td>#2 The Top 10 London Hotels</td>
<td>The Lanesborough</td>
<td></td>
</tr>
<tr>
<td>#18 The Top 25 Resort Hotels in the Caribbean, Bermuda, and the Bahamas</td>
<td>Eden Rock</td>
<td></td>
</tr>
<tr>
<td>#16 The Top 25 Resort Hotels in the Caribbean, Bermuda, and the Bahamas</td>
<td>Jumby Bay</td>
<td></td>
</tr>
<tr>
<td>#13 South America</td>
<td>Palácio Tangará</td>
<td></td>
</tr>
<tr>
<td>#11 Top 25 Hotels Europe</td>
<td>Jumby Bay</td>
<td></td>
</tr>
</tbody>
</table>
1. Introduction

1.9 2021 CSR Highlights & Key Facts

Through hydro-thermal technology, Lake Geneva provides The Woodward with sustainable heating & cooling.

Engagement Survey included 87 Questions about Engagement, Work Environment, Diversity & Inclusion, Learning & Development, Leadership, CSR.

A new CSR principle and 5 new objectives were set to tackle the reduction of carbon emissions.

82 ethnicities

Employees per Gender

Male 54%
Female 46%

Hotels supported and worked with 29 charities and NGOs through donations, fundraising events, hotel-specific services and collaborative actions.

All Oetker Collection Hotels use organic fertilizers and pesticides.
2. Corporate Social Responsibility

2.1 Corporate Social Responsibility at Oetker Collection

**OUR PROMISE**

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 MOTTO AND LOGO**

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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 and Paul von Schnurbein (Head of Operations Development) are the Oetker Collection CSR Team and are leading 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 bi-annual questionnaire to every CSR Patron.

**Table 1: List of Oetker Collection 2021/22 CSR Patrons and Teams**

<table>
<thead>
<tr>
<th>HOTEL</th>
<th>CSR PATRON</th>
<th>CSR TEAM</th>
</tr>
</thead>
<tbody>
<tr>
<td>BRENNERS PARK-HOTEL &amp; SPA</td>
<td>Caspar WESNER</td>
<td>Brenners Greenkeeper</td>
</tr>
<tr>
<td></td>
<td>Sonja TSCHAPKA</td>
<td></td>
</tr>
<tr>
<td>THE LANESBOROUGH</td>
<td>(temporary)</td>
<td>Green Pearl</td>
</tr>
<tr>
<td></td>
<td>Stuart GEDDES</td>
<td></td>
</tr>
<tr>
<td>LE BRISTOL PARIS</td>
<td>Matthieu BOURDON</td>
<td>Bee Green</td>
</tr>
<tr>
<td>HOTEL DU CAP-EDEN-ROC</td>
<td>Julie POIROT</td>
<td>Eden Earth</td>
</tr>
<tr>
<td>CHÂTEAU SAINT-MARTIN &amp; SPA</td>
<td>Amélie PIGEON</td>
<td>Team Avence</td>
</tr>
<tr>
<td>L’APOGÈE COURCHEVEL</td>
<td></td>
<td>BlablApogee</td>
</tr>
<tr>
<td>EDEN ROCK – ST BARTHS</td>
<td>Chloe GANSOINAT</td>
<td>Eden Angels</td>
</tr>
<tr>
<td>PAL ÁCIO TANGARÁ</td>
<td>Carlos FABBIRS</td>
<td>BurleBirds</td>
</tr>
<tr>
<td>JUMBY BAY ISLAND</td>
<td>Aleksandra VUKOJEVIC</td>
<td>TBC</td>
</tr>
<tr>
<td></td>
<td>Gerardo RINCON</td>
<td></td>
</tr>
</tbody>
</table>
2. Corporate Social Responsibility

2.3 Stakeholder Engagement in CSR activities

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

<table>
<thead>
<tr>
<th>HOTEL</th>
<th>STAKEHOLDER</th>
<th>FREQUENCY &amp; TYPE</th>
<th>DIRECT/ INDIRECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>OHMC</td>
<td>CEO</td>
<td>Bi-annual calls</td>
<td>Direct</td>
</tr>
<tr>
<td>EMPLOYEES</td>
<td>Head of Operations</td>
<td>Bi-weekly calls</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>Development</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Purchasing Team</td>
<td>Monthly e-mail &amp; call</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>PR &amp; Communications</td>
<td>Quarterly calls and regular email</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>People &amp; Culture</td>
<td>Monthly calls</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>CSR Patrons &amp; Teams</td>
<td>Quarterly e-mails &amp; ad-hoc calls, meetings*</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>Technical Staff</td>
<td>Monthly e-mails &amp; ad-hoc calls, meetings*</td>
<td>Direct</td>
</tr>
<tr>
<td></td>
<td>General Manager</td>
<td>Quarterly e-mails &amp; annual meetings*</td>
<td>Indirect</td>
</tr>
<tr>
<td></td>
<td>Operations Staff</td>
<td>Monthly e-mails*</td>
<td>Indirect</td>
</tr>
<tr>
<td></td>
<td>All Oetker Collection staff</td>
<td>Internal Social Media System ‘PearlNet’ monthly postings</td>
<td>Indirect</td>
</tr>
<tr>
<td></td>
<td>Guests</td>
<td>Visual communication in hotels &amp; website</td>
<td>Indirect</td>
</tr>
<tr>
<td>SUPPLIERS</td>
<td>Group suppliers &amp;</td>
<td>Annual survey*</td>
<td>Indirect</td>
</tr>
<tr>
<td></td>
<td>individual hotel</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>suppliers</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Only during months when staff was working and hotels open; ** only to very limited extent during 2021

The remainder of the report will present 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.

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

Table 3: List of Oetker Collection’s stakeholder categories

<table>
<thead>
<tr>
<th>SHAREHOLDERS</th>
<th>PARTNERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oetker Collection</td>
<td>Service partners</td>
</tr>
<tr>
<td></td>
<td>Representatives</td>
</tr>
<tr>
<td></td>
<td>Oetker partner hotels</td>
</tr>
<tr>
<td></td>
<td>Hotel associations</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EMPLOYEES</th>
<th>SUPPLIERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative staff</td>
<td>Partner suppliers</td>
</tr>
<tr>
<td>Accommodation staff</td>
<td>Key account suppliers</td>
</tr>
<tr>
<td>Catering staff</td>
<td>Local suppliers</td>
</tr>
<tr>
<td>Technical staff</td>
<td></td>
</tr>
<tr>
<td>Future employees</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>GUESTS &amp; CONSUMERS</th>
<th>COMMUNITIES, CIVIL SOCIETY &amp; NGOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resident guests</td>
<td>Charities (Humanitarian and Nature conservation)</td>
</tr>
<tr>
<td>External guests</td>
<td>Local associations</td>
</tr>
<tr>
<td>Prospective guests</td>
<td>Neighbours</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PUBLIC AUTHORITIES &amp; COMPLIANCE</th>
<th>MEDIA &amp; COMMUNICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social bodies</td>
<td>VIP Press</td>
</tr>
<tr>
<td>Tax bodies</td>
<td>Generic press</td>
</tr>
<tr>
<td>Regulatory bodies</td>
<td>Vocational Training</td>
</tr>
<tr>
<td>Safety commission</td>
<td>TV</td>
</tr>
<tr>
<td>Certification schemes</td>
<td>PR Agencies</td>
</tr>
<tr>
<td></td>
<td>Social Media</td>
</tr>
<tr>
<td></td>
<td>Fairs &amp; Exhibitions</td>
</tr>
<tr>
<td></td>
<td>Schools</td>
</tr>
<tr>
<td></td>
<td>Trade Unions</td>
</tr>
</tbody>
</table>
Once the French properties’ stakeholders were identified, the management established dialogue priorities with the stakeholders (see fig. 1)

The social responsibility assessment of the two French properties led Oetker Collection to approach social and environmental responsibility at the 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 20000 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 (BPH)
- Hotel du Cap-Eden-Roc (HDCER)
- Château Saint-Martin & Spa (CSM)
- Eden Rock – St Barths (ERO)

The other five establishments were not assessed due to the following reasons:

- L’Apogée Courchevel (APG) – the establishment only opened in 2013
- The Lanesborough (LAN) – establishment was added to the collection in November 2014
- Palácio Tangará (TAN) – establishment was added to the collection in June 2017
- Jumby Bay Island – establishment was added to the collection in October 2017
- The Woodward Geneva – establishment was added to the collection in 2020 (official opening in September 2021)
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 into all establishments as effectively. Following 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 to 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 (see section 8.2). Figure 2 shows an overview of the milestones of Oetker Collection’s CSR work over the years.

Figure 2: Milestones of CSR work over the years
* CORE = Compendium of Organizational Requirements and Expectations, an internal company wide strategic document on key areas and key principles of management

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2. Corporate Social Responsibility

2.5 2019 CSR Strategy & 2021 adaptations

Scope

The new 2019 CSR Strategy of Oetker Collection was developed by Group CSR Team 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 the 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 the 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 8.1 specifies initial alignment to GRI Standards – Core option.

Figure 3: The Sustainable Development Goals
2. Corporate Social Responsibility

Structure

The framework of the Oetker CSR Strategy was established in 2015 and remained the same: commitments are at the heart of the strategy and are refined into principles, objectives and requirements (previously known as standards) respectively (see Figure 4).

![Figure 4: Elements of the CSR Strategy](image)

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

Oetker Collection decided that principles and objectives shall remain adaptable if external circumstances (e.g. global Covid-19 pandemic) hamper the implementation of the strategy, or new developments demand or allow for more ambitious principles and goals. Such an adaptation was discussed in 2020 and implemented in 2021 (see subheading strategic adaptations 2021).

Positioning of CSR at Oetker Collection

Oetker Collection summarizes a number of internal company-wide strategies and tactics in a book called CORE (‘Compendium of Organizational Requirements and Expectations’). These strategies and tactics are state-of-the-art when it comes to the management of the hotels.

CORE was developed in 2020 and can be considered an organizational backbone for key management areas. CSR was integrated into CORE as one of six management areas, clarifying and strengthening the importance of CSR at the group level. The compendium is a living document and the hotel’s performance on ‘Requirements & Expectations’ is assessed on a yearly basis.

Strategic adaptations 2021

While the overarching commitments of Oetker Collection remain unchanged since 2015, principles and objectives of the 2019 CSR Strategy were adapted due to a) its incorporation in the Oetker Collection Compendium of Organizational Requirements and Expectations (CORE), b) prolonged hotel closures caused by the global pandemic and c) changes under the new CEO Dr. Timo Gruenert.

Through the integration with CORE, the CSR Strategy underwent the following adaptations: the yearly changing operational targets, previously known as “CSR Standards” have been renamed to “Expectations and Requirements” and are now referred to simply as “CSR Requirements” (see fig. 4); “CSR Strategy & Structure” has been added as a separate component next to the commitments, grouping of CSR Requirements which are of organisational nature and the implementation of CSR Requirements will be part of an internal hotel evaluation process.

Adaptations to the 2019 Strategy in 2021 included the addition of two more principles and changes in all but one of the objectives of the CSR Strategy. For many objectives, the timeline was changed to ensure they remain achievable after the setbacks caused by the global pandemic. Other objectives were consolidated, split or now set to be achieved in a specific year. Furthermore, objectives were reworded to be either more measurable or more ambitious and 15 new objectives were added, especially under the new principles. The current Oetker CSR strategy therefore now includes 15 principles and 45 objectives.

With the changes in the reporting year (ending with the first quarter each year, see 1.2 Reference Framework), the implementation of the objectives will also be assessed at the end of the first quarter. If the timeline was set “by 2022”, completion will actually be measured at the end of the first quarter of 2023.
2. Corporate Social Responsibility

The following overview shows the Oetker Collection 2019 Strategy, including the 2021 updates, with its 4 commitments, their alignment to the SDGs and material topics covered, as well as the 15 principles attached to them. In the 2021 Revision, two Principles were reworded and two new Principles were added.

### 2019 CSR Strategy

#### Commitments

- **Respect Human Rights**

- **Consume Responsibly**
  - Material topics: Risk Management

- **Ensure Environmental Awareness**
  - Material topics: Guest Engagement & Satisfaction

- **Engage with Sustainable Communities**
  - Material topics: Economic Growth

#### Principles

- Ensure our stakeholder is treated fairly while fighting against discrimination
- Promote an optimum quality of life and safety at work
- Encourage the development and employability of our employees
- Ensure constant compliance with local labour and environmental regulations
- Through innovation reduce our consumption of natural resources
- Actively contribute to the global Carbon Reduction goals
- Understand, protect and restore the biodiversity that surrounds us
- Manage solid waste and strive to limit any type of pollution
- Purchase responsibly, favouring suppliers who adhere to our principles
- Provide the necessary framework and training to operate responsibly at each hotel
- Encourage our stakeholder to engage with our CSR commitment
- Communicate transparently about our sustainability goals, initiatives and achievements
- Favour local producers who guarantee the rich heritage of our region
- Commit alongside our partners in projects that are linked to the principles we defend
- Support local communities engaged in the protection of environmental and social projects

---

**Figure 5: Overview of Oetker Collection 2019 CSR Strategy and inputs – Revision 2021**

2019 Strategy - unchanged  
2021 Revision - adapted  
2021 Revision - new
2. Corporate Social Responsibility

Overview of Principles & Objectives

Objectives to be achieved by Oetker Collection’s CSR Team, HR Team, Purchasing Team and CSR Patrons were set within the 2019 Strategy and were reviewed in 2021.

The following overview shows the 15 Principles and 45 Objectives set in the Oetker Collection 2019 Strategy and its 2021 review.

Table 4: Objectives of the 2019 CSR Strategy per Commitment and Principle incl. 2021 adaptations

Commitment 1: Respect Human Rights

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
</table>
| Ensure our stakeholder is treated fairly while fighting against discrimination | By 2022 develop a global Equality Strategy  
By 2023 review all hiring and promotion processes for equal opportunities  
By 2023 discrimination and violence against women and girls is addressed with outsourced service companies  
By 2023 full implementation of global Equality Strategy  
By 2024 every hotel endeavour to employ people with a physical disability |
| Promote an optimum quality of life and safety at work | By 2022 develop and implement a training framework on safety at work for all hotels  
By 2022 develop a framework that supports quality of life for all team members at all hotels |
| Encourage the development and employability of our employees | By 2022 all employees participate in at least one program of the Masterpiece Academy |
| Ensure constant compliance with local labour and environmental regulations. | By 2023 adoption of Modern Slavery Act in all hotels  
By 2023 address Modern Slavery Act with outsourced service companies and suppliers  
By 2022 develop a system ensure awareness and test knowledge on the Oetker Collection Code of Conduct |
### 2. Corporate Social Responsibility

#### Commitment 2: Consume Responsibly

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
</table>
| Through innovation reduce our consumption of natural resources           | By 2022 establish Oetker Collection’s global Scope 1 and Scope 2 carbon emissions baseline  
By 2022 develop specific carbon KPIs and targets for all hotels          | By 2023 implement bulk purchases procedures to reduce transport and packaging in all hotels                         |
| Actively contribute to the global Carbon Reduction goals                  | By 2022 develop a global Climate Investment Program                                                                                         | By 2024 increase transparency of our supply chain by increasing the number of replies to the responsible purchasing survey to 50% of global suppliers. |
| Understand, protect and restore the biodiversity that surrounds us        | By 2022 offer guests to option to donate to the Global Climate Investment Program.                                                             | By 2023 increase transparency of our supply chain by increasing the number of replies to the responsible purchasing survey to 100% of Oetker Collection preferred partners. |
| Manage solid waste and strive to limit any type of pollution             | By 2023 establish a Carbon In-Setting Strategy                                                                                                  | By 2022 foster dialogue with existing suppliers on Oetker Collection’s broader CSR principles. |
|                                                                           | By 2022 implement a process to measure and monitor solid waste in all hotels                                                                  |  
By 2024 ensure 70% of cleaning products purchased are eco-friendly in each hotel |
## 2. Corporate Social Responsibility

### Table 4 (cont): Objectives of the 2019 CSR Strategy per Commitment and Principle incl. 2021 adaptations

<table>
<thead>
<tr>
<th>Commitment 3: Ensure Environmental Awareness</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Principle</strong></td>
<td><strong>Objective</strong></td>
</tr>
<tr>
<td>Provide the necessary framework and training to operate responsibly at each hotel</td>
<td>By 2022 develop a global CSR training framework for team members, including onboarding, continuous and online modules. CSR requirements are updated yearly and progress is monitored on an ongoing basis and for each hotel individually. In 2023 conduct a thorough materiality analysis with all relevant stakeholders.</td>
</tr>
<tr>
<td>Encourage our stakeholder to engage with our CSR commitments</td>
<td>By 2022 implement an annual measurement program of the team members’ awareness and engagement on the hotels’ CSR initiatives. By 2021 develop at least one CSR guest experience per year per hotel. By 2022 develop at least three CSR events for team members per year per hotel. By 2021 offer guests various options to participate in our sustainable service offering (Linen program, Giving Bags, Off-setting program, sustainable menu options).</td>
</tr>
<tr>
<td>Communicate transparently about our sustainability goals, initiatives and achievements</td>
<td>By 2021 develop and implement a CSR communication strategy, including a new website section, social media plans, PR initiatives and internal communication. By 2022 develop and constantly update a CSR section in Oetker Collection’s Photo Library.</td>
</tr>
</tbody>
</table>

### Commitment 4: Engage with Sustainable Communities

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Favour local producers who guarantee the rich heritage of our region</td>
<td>By 2022 foster relationships with local and artisanal enterprises at each hotel. By 2022 work with and actively support local sustainable companies and enterprises.</td>
</tr>
<tr>
<td>Commit alongside our partners in projects that are linked to the principles we defend</td>
<td>By 2022 establish a system to ensure partner collaborations at hotel level are guided by at least one of our CSR principles in order to promote those jointly.</td>
</tr>
<tr>
<td>Support local communities engaged in the protection of environmental and social projects</td>
<td>By 2021 every hotel to engage in at least two long-lasting charitable projects where team members and guests can participate in.</td>
</tr>
</tbody>
</table>

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2. Corporate Social Responsibility

2.6 2021 CSR Requirements & Progress

The CSR Requirements are reviewed on a yearly basis to establish tangible actions for the Oetker Collection CSR Strategy, which are easy to implement at each property in their own context.

Due to the special circumstances of the global Covid-19 pandemic in 2020 and associated irregular or limited operation of the hotels, CSR Requirements that year were not assessed. As a result, the 2020 CSR Requirements were largely kept unchanged for 2021 and only minimal changes were adopted. Nonetheless, several CSR Requirements were split into two or three separate requirements and new ones were added as the CSR Strategy was integrated into the new internal CORE framework.

Oetker Collection’s progress towards full implementation of each Requirement is presented in following graphs. Compared to other years, Oetker Collection performed below its usual levels, as the impact of the global pandemic hampered hotel operations and most CSR teams were working with limited resources and fewer team members. Complete implementation was therefore more difficult to achieve.

CSR Requirements set to support the general achievement of the CSR Strategy and Structure for 2021 are:

1. A dedicated CSR Team is established which meets at least once a month
2. The Head of People & Culture is an integral member of the CSR Team
3. Employ one CSR intern as soon as situation allows it
4. The CSR Team is empowered by the management to take respective actions
5. The Data Monitoring System is installed and updated at least on a monthly basis

Requirements 1 and 3 were particularly challenging for Oetker Collection hotels in 2021-Q1 2022 as the global pandemic still impacted the availability of hospitality workforce and operational capacity. The implementation of the data monitoring system at all hotels (Requirement 5) remained just above 80% as all hotels have a platform in place, but updates were sometimes irregular.

The average score for CSR Strategy and Structure was 63.9% the last time the full assessment was carried out. Requirement 2 and 4 were not assessed separately at group level, as reporting responsibilities and mechanisms were allocated differently.
### 3. Commitment I. Respect Human Rights

The Principles and Objectives set under Commitment 1 – Respect Human rights are the following:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure our stakeholder is treated fairly while fighting against discrimination</td>
<td>By 2023 review all hiring and promotion processes for equal opportunities</td>
</tr>
<tr>
<td></td>
<td>By 2023 review all hiring and promotion processes for equal opportunities</td>
</tr>
<tr>
<td></td>
<td>By 2023 discrimination and violence against women and girls is addressed with outsourced service companies</td>
</tr>
<tr>
<td></td>
<td>By 2023 full implementation of global Equality Strategy</td>
</tr>
<tr>
<td></td>
<td>By 2024 every hotel endeavour to employ people with a physical disability</td>
</tr>
<tr>
<td>Promote an optimum quality of life and safety at work</td>
<td>By 2022 develop and implement a training framework on safety at work for all hotels</td>
</tr>
<tr>
<td></td>
<td>By 2022 develop a framework that supports quality of life for all team members at all hotels</td>
</tr>
<tr>
<td>Encourage the development and employability of our employees</td>
<td>By 2022 all employees participate in at least one program of the Masterpiece Academy</td>
</tr>
<tr>
<td>Ensure constant compliance with local labour and environmental regulations.</td>
<td>By 2023 adoption of Modern Slavery Act in all hotels</td>
</tr>
<tr>
<td></td>
<td>By 2023 address Modern Slavery Act with outsourced service companies and suppliers</td>
</tr>
<tr>
<td></td>
<td>By 2022 develop a system ensure awareness and test knowledge on the Oetker Collection Code of Conduct</td>
</tr>
</tbody>
</table>

**Alignment to SDGs:**

**Material topics addressed:**

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

**CSR Requirements set to support the general achievement of Commitment I. for 2021 are:**

1. Management actively works against harassment and has a system in place to anonymously report incidents.
2. Management endeavours to employ team members with a physical disability.
3. All team members have access to the Oetker Collection E-learning platform.
4. There is a system in place to test team members on Oetker Collection Code of Conduct at least every 3 years.

The average score achieved so far by the group for Commitment I was 60%, as noted in the most recent assessments. These Requirements were not assessed separately at group level during the reporting period, as reporting responsibilities and mechanisms were allocated differently.
3. Commitment I. Respect Human Rights

3.1 HR Key Figures

The total number of Oetker Collection employees in spring 2022 was 2,447. The Group implemented a common HR software called Talentsoft to collect more employee data. As the alignment of certain employee data is still in progress, certain data may not be finite.

The diversity of the employees in spring 2022 was as follows:

- Gender: 46% Female and 54% Male
- 82 different ethnicities are represented (see Figure 7 for more details)
- Age demographics (see Figure 8):
  - 38% under 30 years old
  - 45% between 30 and 50 years
  - 16% above 50 years old

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

Oetker Collection focusses mainly on permanent employment contracts. By the end of Q1 2022, 85% of staff were employed permanently. 9% of staff had a seasonal agreement, 3% of the staff had temporary contracts and 3% of staff were interns.

Seasonal contracts are mainly used at the seasonal hotels Château Saint Martin & Spa, Hotel du Cap-Eden-Roc, L’Apogée as well as Eden Rock – St Barths in St. Barthélemy. Furthermore, Jumby Bay Island employs a regular workforce and an additional temporary workforce during their high season (December to April).
3. Commitment I. Respect Human Rights

3.2 Human Rights and Labour Laws

Policies

The OHMC Executive Committee, OHMC People & Culture Team, Hotel Managing Director, Hotel 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 Spirit, Elegance and Genuine Kindness.


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

Oetker Collection developed its own Responsible Purchasing Policy which lays down the organisation’s ethical values and its social responsibility and environmental commitments in the purchasing process. 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 4.3 Sustainable Purchasing.)

Furthermore, Oetker Collection has a Code of Conduct, of which a new version is being developed at the point of publication of this report, due to the separation of the Oetker Group into separate companies (see section 1.5 Company Structure).

The Oetker Collection complies with labour laws that are under the umbrella of the Universal Declaration of Human Rights and acts in alignment with its company values, philosophy and principles.

The previous Compliance Management System is being adopted by the Geschwister Oetker Beteiligungen KG (see Section 3.3)

Requirements and expectations related to human rights, as well as guidelines and structures which Oetker Collection hotels need to adhere to, are stipulated in CORE (Compendium of Organizational Requirements and Expectations, an internal company wide strategic document).

Communication

Until November 2021, the Oetker Code of Conduct was attached as an addendum to all employment contracts. The new Code of Conduct, once approved, will be communicated to all team members and will be included in a mandatory e-learning module on the Masterpiece Academy online learning platform.

All team members attend the Oetker Collection induction programs whereby senior managers present and reflect the company values, philosophy, principles.

In the two new hotels all team members (340) attended a human right and discrimination & harassment training of 1.5-2 hours. The same training is planned to be launched to existing hotels via the online learning Masterpiece Academy.

Monitoring and evaluation

The Code of Conduct is monitored in each hotel through:
• CORE Guidelines Hotel reports and audits
• The completion of the mandatory e-learning module
• The reporting of the hotels on employment/legal risks, situations and legal cases

As part of the new CORE People & Culture guidelines, all hotels are implementing formal mandatory monthly meetings with a representative from each department to discuss working conditions, safety and wellness which reflect human rights and wellbeing.

In addition, the new Peakon Engagement Survey gives the People & Culture department instant alerts on any issues with sensitive topics such as harassment, discrimination, and violence in the workplace. Action planning is tracked and anonymous conversation with team members is facilitated.
3. Commitment I. Respect Human Rights

**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: People & Culture Hotel Team, People & Culture Corporate, ExCom Members OC, Work Council, Representative, Union representative, Local Labour law authorities, Industrial or Labour Court. With the same aim, a whistle-blower policy and confidential hotline is in place.

Internal investigations of alleged incidents are conducted by the Heads of Departments and People & Culture Leader under the supervision of OHMC People & Culture. Once investigated and verified the disciplinary process applied up to and including termination depending on the level and severity of the offence.

The SVP People & Culture 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.

There were no human rights incidents in the time span covered by this report.

In the area of human rights, the implementation of the following goals set for 2022:

- Create and launch a diversity & inclusion formal program based on progressive practices and feedback from the annual engagement survey (Peakon) including employment risks.
- Roll out a diversity & inclusion Leadership Training Program
- Focus on hiring people with disabilities by creating partnerships in the communities
- Create exit interviews and reasons for turnover
- Incorporate information on the whistle-blower policy and confidential hotline into the Masterpiece Academy online learning
3. 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.

The responsibility and accountability for the protection of labour rights within the organisation lies with Managing Directors / General Managers and People & Culture Leaders in the hotels, as well as the Oetker Collection ExCo Members and OHMC People & Culture. To address and review labour policies, reduce labour risks and respond to labour violations (including discrimination) People & Culture Corporate has:

- conducted employment legal risk assessments in the UK, France, Brazil, Antigua, Switzerland and Italy
- received support from professional experts and labour law lawyers to understand local practices and ensure compliance, anticipate, assess risk & current litigation, and deploy labour law strategy in alignment with the OC Business strategy (this also applies to local People & Culture Teams)
- Ensured continued alignment with company values & principles
- Executed leadership training on labour laws in the hotels La Palma and The Woodward and is rolling it out to existing hotel
- led the review of labour principles results and shared key issues and actions to take up with senior management
- been rolling out new People & Culture CORE Guidelines that include risk assessments and introducing new programs to remedy any ineffective mechanisms
- been rolling out a new Employee Engagement Survey via the Peakon software, which includes specific questions on diversity and inclusion, harassment, labour practices, fair treatment, and allows real time comments with immediate flagging of sensitive comments and anonymous conversation and coaching.
- Participated in local and global compensation surveys
- implemented a new Whistleblowing policy

Oetker Collection also has regular communication programs in place regarding labour laws. These include: 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 and clear measurement of a follow-up action plan for all business units to implement.

Health and safety are ensured through compliance with local laws and Health & Safety Committee meetings. Team members of the new hotel in La Palma, Italy are undergoing specific safety training according to level and position. Health & Safety Committees are being rolled out to all hotels through CORE.

Additionally, specific Health & Safety Drivers are incorporated into the new Employee Engagement Survey on the Peakon software and into the planned actions.

If a property incurs an incident of violation of labour principles it will inform the Work Council and/or Union to conduct an internal inquiry. If needed, an employee representative will attend the inquiry interviews. The 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 the employee contract. OHMC People & Culture will analyse and assess the incident with the support and consultation of experts, labour law lawyers, resulting in the implementation of immediate actions. The incident will be provided as an anonymous case study to other hotels for guidance and prevention. People & Culture Leaders will be trained and coached to share best practices throughout the organisation.

The Corporate Office has rolled out CORE Guidelines to all hotels. These guidelines will ensure that leaders in each hotel (including CSR, People & Culture, Sales & Marketing, Finance, Purchasing, Operations) understand expectations and guidelines. All hotel areas are audited for their implementation. These guidelines also cover risk assessments, and programs to remedy any ineffective grievance mechanisms.
3. Commitment I. Respect Human Rights

No legal cases were reported in the reporting period 2021 – Q1 2022.

People & Culture initiatives for 2022 will include Exit and Stay Interviews via the new engagement survey through the Peakon software. Furthermore, as part of the diversity & inclusion program, employment equity will be a focus with the planned implementation of a recruitment target regarding the employment of people with disabilities and from vulnerable groups.

For 2023 the introduction of a CORE People & Culture compensation module is planned with salary bands and percentiles which will allow analyses and alignment of salaries.

Additionally, the implementation of occupational injuries and disease reports through CORE People & Culture is planned.

3.3 Fair Operating Practices

The Compliance Management System is in line with the group’s fair operating practices and increasing legal requirements. Within this system’s framework, a Compliance Organization has been 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 Compliance Officer (normally the CFO holds this position) who oversees all activities and potential issues in reference to compliance or 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.

GOB’s Audit Team conducts internal audits of every company within the Group to assess potential areas of corruption. Following internal audits, the company evaluates its anti-corruption performance through action plans and regular meetings at the Group Coordinator level. The sensitisation of the management team leads to proactive prevention of anti-corruption.
3. Commitment I. Respect Human Rights

3.4 Team Member Engagement

Employee Engagement an important business strategy for Oetker Collection because of its values of family spirit, genuine kindness and elegance. It also has a correlation to its business outcomes namely:

- Performance & Profitability
- Employee Attraction
- Customer Service
- Productivity
- Retention

All hotels as well as the Oetker Hotel Management Company took part in the engagement survey over a staggered period due to seasonal operations. The participation rate was 66% by the time this report was published.

Results can be analysed by various criteria and compared to global benchmarks. The findings are used in each hotel to identify priorities and regularly share and measure progress and allow transparent action planning in real-time.

At the time of publication of this report, the complete results were not yet known. A further description of the results and progress published within the next CSR report.

The group believes that learning & development both professionally and personally is key to develop and sustain the long-term future of generations to come. Specifically, the learning concept is composed of 3 different phases: Engage, Educate and Excel (see Figure 11). 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.

The new employee engagement survey powered by Peakon was officially launched in September 2021 throughout the organisation and included 87 questions with customised questions on company strategy, values, CSR and learning & development. The Peakon platform has been selected in line with the CSR initiative to go paperless while ensuring the highest level of anonymity and confidentiality online and can be tracked historically year over year and attached to business impacts.

Figure 9: Oetker Collection Engagement Measurement

Figure 10: Oetker Collection Engagement Drivers Measured

Figure 11: Oetker Collection learning Phases
3. Commitment I. Respect Human Rights

Oetker Collection is progressively deploying the Oetker Collection E-Learning Centre, Masterpiece Academy, 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”.

The Masterpiece Academy is accessible to all Oetker Collection employees for their development. Modules include face to face learning, e-learning, blended learning or external educational institutions. All learning is tracked and measured by the OHMC People & Culture office.

Three types of contents are available in the Academy:

1. OC Masterclasses which are presented in the form of inspiring video modules by talented team members
2. The OC hospitality customized library which provides highly interactive learning with enhanced learning options on various divisions and departments of the hotels
3. The Campus, an off the shelf selection of e-learning on a variety of personal and professional development outside of the hospitality industry.

The Masterclasses more specifically envision various employees from all different departments and from senior to junior level to showcase their talents, skills and unique experiences as fine hoteliers to reflect the OC values and inspire colleagues across the globe.

3.5 Property Actions & Processes

CHÂTEAU SAINT-MARTIN & SPA
• A town hall meeting was organized, for a direct exchange between staff and hotel management
• The hotel continued offering osteopath sessions to its staff – four employees participated in seven sessions since July

HOTEL DU CAP-EDEN-ROC
• Three town hall meetings were organized, for a direct exchange between staff and hotel management
• Continued visits of the osteopath
• The People & Culture department organized massage sessions
• The hotels equality label was renewed

PALÁCIO TANGARÁ
• During the hotel’s awareness week lectures and discussion forums with over 250 participants were held on the topics of diversity at their workplace and mental health during pandemic periods

EDEN ROCK - ST BARTH
• The HR manager participated at the thesis presentation of a previous intern about Sustainability within the Luxury Hotel Industry
### 4. Commitment II. Consume Responsibly

The Principles and Objectives set under Commitment II. - Consume Responsibly are the following:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Through innovation reduce our consumption of natural resources</td>
<td>By 2024 reduce average energy consumption per room night by 10% vs. 2018&lt;br&gt;By 2024 reduce average water consumption per room night by 10% vs. 2018&lt;br&gt;All new hotels will be given specific reduction targets to align with the above</td>
</tr>
<tr>
<td>Actively contribute to the global Carbon Reduction goals</td>
<td>By 2022 establish Oetker Collection’s global Scope 1 and Scope 2 carbon emissions baseline&lt;br&gt;By 2022 develop specific carbon KPIs and targets for all hotels&lt;br&gt;By 2022 develop a global Climate Investment Program&lt;br&gt;By 2022 offer guests to option to donate to the Global Climate Investment Program.&lt;br&gt;By 2023 establish a Carbon In-Setting Strategy</td>
</tr>
<tr>
<td>Understand, protect and restore the biodiversity that surrounds us</td>
<td>By 2022 each hotel to commit to the protection of 1 species within their surrounding area&lt;br&gt;By 2023 define a global company approach to reduce impact on biodiversity.</td>
</tr>
<tr>
<td>Manage solid waste and strive to limit any type of pollution</td>
<td>By 2022 implement a process to measure and monitor solid waste in all hotels&lt;br&gt;By 2023 establish a sustainable solid waste management plan in all hotels&lt;br&gt;By 2022 all hotels use organic fertilizers and pesticides only&lt;br&gt;By 2024 ensure 70% of cleaning products purchased are eco-friendly in each hotel&lt;br&gt;By 2022 all hotels provide a fleet of sustainable vehicles for guest use&lt;br&gt;By 2022 all applicable hotels provide a car sharing schemes for team members</td>
</tr>
<tr>
<td>Purchase responsibly, favouring suppliers who adhere to our principles</td>
<td>By 2021 Oetker Collection Responsible Purchasing Policy is developed, updated on an annual basis, aligned to our commitments and available in all our operating languages to all stakeholders&lt;br&gt;By 2022 implement bulk purchases procedures to reduce transport and packaging in all hotels&lt;br&gt;By 2023 increase transparency of our supply chain by increasing the number of replies to the responsible purchasing survey to 50% of global suppliers.&lt;br&gt;By 2023 increase transparency of our supply chain by increasing the number of replies to the responsible purchasing survey to 100% of Oetker Collection preferred partners&lt;br&gt;By 2022 foster dialogue with existing suppliers on Oetker Collection’s broader CSR principles.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Alignment to SDGs:</th>
<th>Material topics addressed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk Management</td>
<td></td>
</tr>
</tbody>
</table>

![Alignment to SDGs](image-url)
4. Commitment II. Consume Responsibly

CSR Requirements set to support the general achievement of Commitment II. for 2021 are:

1. & 2. Complete already started LED retrofit installations and share best practice with other engineers within Oetker Collection
2. & 5. Make active use and disseminate resource reduction tools to reduce water and energy consumption
3. Identify, plan and conduct for infrastructural improvements to reduce property's water consumption
4. Only provide sustainably sourced fish for all staff canteens and guest restaurants
5. Avoid plastic cups in staff canteens
6. Replace all plastic materials in-room (e.g. plastic bottles, laundry delivery bags, slippers sleeves, newspapers bags)
7. Recycle Nespresso capsules with B2B service or replace with biodegradable capsules, or other sustainable options
8. Communicate coffee capsule recycling or composting program
9. Ensure property has a recycling system in place for both back and front of house trash
10. Use organic fertilizers and pesticides
11. Use ecological cleaning products
12. Use ecological laundry products
13. Provide fleet of sustainable vehicles for guest use
14. Implement an employee car sharing scheme
15. Source sustainable coffee and tea only
16. Use only free range and organic eggs and avoid purchasing meat from intensive mass animal farms
17. Use FSC or sustainably certified paper and aim for paperless communication
18. Seek renewable energy utility contracts
19. Communicate coffee capsule recycling or composting program
20. Use FSC or sustainably certified paper and aim for paperless communication
21. Source sustainable coffee and tea only
22. Use organic fertilizers and pesticides
23. Use ecological cleaning products
24. Use ecological laundry products
25. Ensure property has a recycling system in place for both back and front of house trash
26. Implement an employee car sharing scheme
27. Source sustainable coffee and tea only
28. Use only free range and organic eggs and avoid purchasing meat from intensive mass animal farms
29. Use FSC or sustainably certified paper and aim for paperless communication
30. Seek renewable energy utility contracts

With three exceptions, all CSR requirements on responsible consumption have been implemented by over 60% with two requirements having been fully implemented across the group. The overall score for Commitment II. was 76%.

Implemented by the fewest hotels was Requirement 3 & 5 on the active use and dissemination of a resource reduction tool, which was due to inconvenient timing and vague communication between the CSR team and the hotels. Furthermore, the communication of the coffee capsule recycling or composting program was implemented to only 56%. This was due to the local waste management systems not offering recycling options for the capsule types. Recognised by the CSR team, discussions and steps to address recycling of coffee capsules more specifically have been planned for the following reporting year.

Fully implemented were Requirement 7, where plastic cups were avoided in all canteens, and Requirement 12 with a complete switch to organic fertilisers and pesticides across all hotels.
4. Commitment II. Consume Responsibly

4.1 Organisation Overview

Environmental goals are integrated into the overall Oetker Collection CSR Strategy and environmental stewardship is equally 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 Requirements, as all requirements directly or indirectly relate to the environment.

The Group CSR Team is responsible for the development of environmental action plans at the group level with the Head of Operations Development and CEO overseeing their ultimate adoption. At the property level, the CSR Patron and/or a designated Hotel ExCo member are responsible to incentivize and implement environmental initiatives, with the support of the Property CSR Teams, General Managers and Facility Managers. The CSR Patron and/or designated ExCo member are also the first point of contact when employees, guests and suppliers at the property level have concerns with regard to the hotel or company’s environmental performance. Group suppliers and partners can contact the Group Purchasing Team, Management Team and CSR Team for company environmental enquiries.

4.2 Environmental Monitoring

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

In the reporting period, each Oetker Collection property provides consumption data, including electricity, gas, fuel and water into Con-Serve™ as well as room nights as a correlation metric. CSR Patrons, Facility Managers and General Managers are provided with bespoke quarterly consumption reports 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 consumption hotspots and best practice, carbon footprint summary and action points.

In addition to the above-mentioned resource consumptions, Oetker Collection internally reviewed further CO₂-relevant data. The focus lied on Scope 1 and Scope 2 GHG emissions for which each hotel provided further information. Internally the emission data as well as the data quality were analysed and internally discussed.
To evaluate resource efficiency in 2021, 2019 was chosen as a comparison period as a year that wasn’t impacted by the pandemic. In absolute terms, all Oetker Collection properties significantly reduced their consumption of electricity (-20%), fuel & heat (-17) and water (-20%). However, the occupancy in various hotels was significantly lower in 2021 compared to 2019 (still impacted by the pandemic) which resulted in an increase in resource consumption per room night by approx. 33%. The hotels were therefore prompted on different occasions to review their efficiency during low-occupancy periods.

![Graph showing property half-hourly electricity consumption](image)

Figure 13 Property half-hourly electricity consumption

Adapted to data resolution, various hotspot analyses were completed to highlight areas for improvement in each property. For example, half-hourly data was analysed in so-called daily profiles where consumption was compared between different weekdays or to the previous quarter as shown in Figure 13. Such graphics help the hotels to review shifting consumption peaks and make specific adaptations in, for example, technical settings of certain equipment. Furthermore, a comparison of day and night-time consumption provides hotels with information to evaluate general operations.

The annual analysis includes the identification of best practices for each property. Highlights in 2019 are demonstrated below.

**THE WOODWARD GENEVA**

The newest addition to the collection boasts a promising low carbon cooling system.

The cooling system, soon to be mandatory in Geneva, takes water from a 50 meters depth in Lake Geneva to provide cold air to the building. This technology has the potential to reduce a building’s carbon emissions by 80%.

**LE BRISTOL PARIS**

In Q4 2021, Le Bristol reduced its electricity consumption by 21.4% compared to Q4 2019, with similar occupancy levels between the two quarters.

Much of these savings can be attributed to a focus on lowering baseline consumption with additional monitoring efforts and improvements in energy efficiency.

Oetker Collection has committed to reducing its 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. In 2019, Oetker Collection successfully reduced its energy consumption 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%.

In addition, the objective was reviewed in 2020/21 to accommodate the addition of new hotels to the collection. Instead of an absolute target, the consumption targets were set to be relative to occupancy (see Table 4). Therefore, in 2021, the internal performance analysis of the Oetker Collection hotels referred to their upcoming targets. For 2021, no evaluation of the progress towards the original 10% reduction goal is included in this report: Results were deemed distorted due to incomparable operational patterns and exceptionally low consumption of electricity, gas and water during closures. Furthermore, the analyses would confuse regarding new targets set. Due to the same reasons, the carbon footprint of Oetker Collection has not been established for 2021.

Waste management remains a planned focus area after an initial baseline assessment in 2019. Initial plans had to be put on hold due to the global pandemic, the continuation of waste monitoring should resume as operations allow further efforts in that area.
4.3 Sustainable Purchasing

Oetker Collection’s commitment to responsible consumption includes a principle to purchase responsibly, favouring suppliers who adhere to Oetker Collection’s broader CSR principles. This means particular attention is being paid to the social, environmental, ethical and governance principles and activities of suppliers with which Oetker Collection seeks partnership.

Oetker Collection’s supply chain depends on the requirements of the hotels and customers as shown in Figure 14. Oetker Collection’s main groups of purchases include food and beverage, cleaning supplies, guest supplies, operating equipment and others (e.g. IT, printing...). Within each group of purchases, specific agreements are negotiated by Oetker Collection’s Procurement Team to allow hotels to benefit from specific pricing conditions.

Since 2016, about 50 Oetker Collection vendors have been selected with whom an agreement is signed for preferential group purchasing conditions. Each supplier is selected considering the following main criteria:

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

CSR compliance of Oetker Collection’s vendors is screened before the arrangement of an agreement. This process was further refined in 2021 to the following steps:

1. Supplier is informed about Oetker Collection’s CSR commitments during initial discussions with Group Purchasing Team;
2. Group Purchasing Team requests additional CSR information and documentation from supplier through a CSR questionnaire;
3. Supplier CSR information and documentation are reviewed by Group Purchasing Team (in specific cases, the Group CSR Team will investigate a specific supplier as well);
4. Purchasing Team and CSR Team make an informed decision on whether to work with the supplier.

Following the initial screening, Oetker Collection vendors are invited to a yearly CSR questionnaire for continued monitoring of suppliers’ sustainability performance. This questionnaire was first developed in 2017 and was then further adapted in 2020 to extend the range of partners which are assessed to include service companies and other partners as well.

Since 2020, the screening of vendors is combined with a ranking which helps measure the suppliers’ CSR compliance and which further improves the CSR compliance within Oetker Collection’s supply chain.

The assessment distinguishes between environmental and social commitments as well as reporting efforts, certificates and other aspects. The ranking classifies partners as Gold, Silver or Bronze Partners, where Gold Partners have implemented CSR as an integral part of the company’s value, Silver Partners are committed to various CSR actions but still show further room for improvement and Bronze Partners concentrate on only few CSR commitments or aspects.
Between January 2021 and March 2022, the Group Procurement Team and the Hotel Procurement or CSR Teams sent out the CSR survey to their suppliers.

At the Group level, the assessment showed that vendors slightly improved in their CSR performance. 15% of vendors reached the highest score range and were classified as Gold Partners, 44% were classified as Silver Partners and 41% as Bronze Partners (see fig. 15) In 2020, the distribution was 13% Gold, 38% Silver and 49% Bronze.

At hotel level, suppliers showed a similar distribution between the three classifications. Yet, the responses collected from hotel suppliers were not representative to form a group average.

Oetker Collection believes in a collaborative approach to sustainability. Assessment and scoring of suppliers are kept tough to ensure gaps in sustainability performance are visible in the ranking. The ranking and collected information are used for further conversations around CSR with these suppliers and what further improvements should be considered by them.

Further to CSR screening, a Responsible Purchasing Policy is in place to support the Oetker Collection hotels with sustainable purchasing choices. It is important for Oetker Collection’s suppliers to be aware of the Oetker Collection CSR Strategy, as suppliers are an extension of the group.

The Responsible Purchasing Policy is available for all suppliers in English, French, German and Portuguese.
4. Commitment II. Consume Responsibly

4.4 Property Actions

CHÂTEAU SAINT-MARTIN & SPA
- The Malongo coffee capsules are biodegradable
- 2.16 tons of vegetable waste from the kitchen and Juice Bar were composted at the hotel itself
- All fertilisers are organic and no pesticides are used
- The hotel was in direct communication with their suppliers of cleaning products to ensure the use of a maximum of ecological products
- Hotel used 9% more paper than in 2019 but 7% fewer tissues

JUMBY BAY ISLAND
- Compostable packaging has been implemented for tea and coffee
- Food and organic waste are composted on the island
- There are six electric vehicle charging points on site
- All stationery was removed from rooms, which helped reduce paper consumption

PALÁCIO TANGARÁ
- To reduce paper use, digital signatures are used on contracts and documents and several departments switched to digital documents
- Waste is separated into organic waste, metal, glass, wood, paper and cardboard, oil and chemicals and sold to recycling companies. Revenue from selling oil is used for the end-of-year staff party.
- The switch to digital documents and digital contracts resulted in significant monetary savings

EDEN ROCK - ST BARTHS
- Food waste is given to a farm
- 100% of fertilizers and pesticides are organic
- Printed paper is reused internally
- Coral Safe sunscreen by Esthederm was introduced at the Sun Spa and Eden Being

HOTEL DU CAP-EDEN-ROC
- Further lighting was changed to LED in the park
- All straws are made from sugar cane and the team also looks for alternatives that are home-compostable
- Any remaining plastic bottles (in rooms, cars, fitness and swimming pool) are made from recycled PET (Evian nude bottle), rooms have also glass bottles
- Organic coffee is offered in rooms: Nespresso capsules “Peru organic”
- The Malongo coffee capsules are biodegradable
- 4.36 tons of vegetable waste from the kitchen and Juice Bar were composted at the hotel itself
- 100% of fertilizers are organic and no pesticides are used
- The hotel was in direct communication with their suppliers of cleaning products to ensure the use of a maximum of ecological products
- New restaurant table napkins were ordered from a different supplier (Natural cotton), which are compostable
- The limousine provider used a new electric Mercedes for airport transfers in June-August
- Tablets are used for the room directory (in rooms) and wine list (restaurant)
- Hand dryers replace paper tissues in staff locker rooms

L’APOGÉE
- The engineering team is installing new sub-meters and automated data collection for water.
- 47% of fish offered to staff in the canteen is MSC certified
- Origin of tuna used for sushi in the guest restaurant is checked to ensure that it is not purchased from intensive fisheries
- Eggs and poultry are certified organic and free-range
- Coffee capsules are recycled through Nespresso partner in France, La Poste.

LE BRISTOL PARIS
- Due to Covid, many staff are cycling to work which is further encouraged by free bike parking in the hotel
- The hotel staff were trained regarding resource consumption
4. Commitment II. Consume Responsibly

**BRENNERS PARK-HOTEL & SPA**

- Resource consumption is a regular discussion point, but current energy contracts and outdated fittings are an obstacle, all contracted resources are currently under review.
- Resource consumption (water) was evaluated, and plans have been elaborated which are currently under review at owner level.
- Further plastics are eliminated such as plastic coffee cups and do-not-disturb door hangers, and sustainable alternatives for guest amenities and their packaging are being looked into.
- Discussions with the supplier of Nespresso capsules for B2B takeback.
- Waste segregation is being implemented in offices but on hold in rooms.
- A new electric vehicle is being sourced, all team members have access to subsidized tickets for public transport and a sustainable bike leasing initiative has been launched.
- A renovation is planned which will include updating the hotel’s outdated fittings.
- The hotel is looking to replace plastic bathroom amenities with recycled options – possibly made from ocean plastic.
- Housekeeping is currently trialling new samples of ecological cleaning products.

**THE LANESBOROUGH**

- Improvements for various large equipment are being reviewed, such as the air conditioning and steam boilers.
- Research was carried out about more sustainable alternatives for the plastic bottles in the gym.
- Investments for improved paper recycling in offices are planned.
- Tea is sourced from Hoogly (ethically sourced, fairly traded and in biodegradable tea bags).
5. Commitment III. Ensure Environmental Awareness

The Principles and Objectives set under Commitment III. - Ensure Environmental Awareness are the following:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide the necessary framework and training to operate responsibly at each hotel</td>
<td>By 2022 develop a global CSR training framework for team members, including onboarding, continuous and online modules. CSR requirements are updated yearly and progress is monitored on an ongoing basis and for each hotel individually. In 2023 conduct a thorough materiality analysis with all relevant stakeholders.</td>
</tr>
<tr>
<td>Encourage our stakeholder to engage with our CSR commitments</td>
<td>By 2022 implement an annual measurement program of the team members’ awareness and engagement on the hotels’ CSR initiatives. By 2021 develop at least one CSR guest experience per year per hotel. By 2022 develop at least three CSR events for team members per year per hotel. By 2021 offer guests various options to participate in our sustainable service offering (Linen program, Giving Bags, Off-setting program, sustainable menu options).</td>
</tr>
<tr>
<td>Communicate transparently about our sustainability goals, initiatives and achievements</td>
<td>By 2021 develop and implement a CSR communication strategy, including a new website section, social media plans, PR initiatives and internal communication. By 2022 develop and constantly update a CSR section in Oetker Collection’s Photo Library.</td>
</tr>
</tbody>
</table>

Alignment to SDGs:

Material topics addressed:

- Guest Engagement & Satisfaction

CSR Requirements set to support the general achievement of Commitment III. for 2021 are:

1. & 2. Create two CSR events to engage staff and guests per year
2. Hold an annual CSR info day (virtually also possible)
3. Give guests the choice to change their towels and sheets at two days interval
4. Giving Bags: provide the guest with the possibility to donate their clothes to charity
5. Bathroom amenities and soaps: giving to charities that have recycling programs for these (until single use-plastic bottles are removed from hotels)
6. The overall CSR engagement is accordingly communicated on the hotel’s website and up to date
7. An overview of the hotel’s CSR engagement is provided to the Corporate Communications and CSR department on a quarterly basis
8. Social Media Channels – 2 x Instagram stories per month #GreenPearl
9. For every quarter post one CSR achievement on PearlNet and for OC Social Media Channels

Due to the impact of the pandemic and smaller teams, CSR info days were only held on rare occasions during the reporting period and there were fewer efforts on the upkeep of social media posts on CSR topics. The non-daily change of towels and sheets, as well as the donation initiative through giving bags (or similar), were implemented by 90% or more across the hotel group. The overall score for Commitment III. was 65%
5. Commitment III. Ensure Environmental Awareness

5.1 Quality & 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 mystery guest. Heads of department are then provided with internal tests and action plans tracked throughout the year to ensure compliance.

LQA global branding ranking (Figure 17), demonstrates Oetker Collection’s continuous commitment to guaranteeing an impeccable and responsible service. Reaching a score of 89% by March 2022, Oetker Collection remained amongst the leading brands in its competitor set, 6% above the competitor set average.

LQA introduced sustainability as a new assessment category, based on specific LQA standards, which is continuously reviewed by the CSR Team.

**Brands Included in LQA Group:**

<table>
<thead>
<tr>
<th>Belmond</th>
<th>Mandarin Oriental</th>
<th>Oetker Collection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fairmont Hotels</td>
<td>Oetker Collection</td>
<td>Raffles</td>
</tr>
<tr>
<td>Four Seasons</td>
<td>Rocco Forte Hotels</td>
<td>Rosewood Hotels</td>
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<td>Jumeirah</td>
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<tr>
<td>Leading Hotels of the World</td>
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Figure 17: LQA global brand ranking during reporting period

5.2 Guest & Staff Communication

Oetker Collection aims to transmit its CSR vision and values to all of its stakeholders, to ultimately have a greater impact. It achieves this Principle through CSR communication and activities.

Communication around all CSR-related initiatives at each of the properties has been integrated into the various channels of communication, both internally and externally. These are:

- Social media channels (Instagram, Facebook, LinkedIn)
- Website
- Online Blog (Journal) with its own section on CSR, called “Be Green”
- PR – dissemination of relevant press releases to all media contacts of the hotel group
- Travel Trade- information newsletter with updates on all hotels (including CSR information) is sent to all travel agents and wholesalers every 3 months
- PearlNet - the group internal communication platform to which all staff and management are invited

Further CSR communication included:

- The participation of CEO Dr. Timo Gruenert in a panel discussion about CSR at the “101 Executive Summit” in June 2021
- An interview published in the the Lianhe Zaobao, Singapore (Daily Chinese newspaper) : "At Oetker Collection, we are also very committed to building robust connections with the communities where our hotels are located and in protecting and preserving local ecosystems and cultures. It is important for us to be responsible corporate citizens, and that includes consuming responsibly, ensuring environmental awareness and engaging meaningfully with sustainable communities. With that, we are also proud signatories to the UN Global Compact Report and have a comprehensive CSR strategy. It’s an area of increased importance for us.’
- An interview with the CEO published in Harper’s Bazaar Brazil: "Each of our hotels supports a local and an international charity and works with a charity focused on the preservation of a local endangered species [...]"
5. Commitment III. Ensure Environmental Awareness

5.3 Green Pearl Award

In 2017, the Group CSR Team established an award system for individual property CSR Teams, which is part of a range of internal group-wide awards called “Albert Awards”. The Green Pearl Award is provided to the CSR team who best performs in fulfilling the Oetker Collection CSR Commitments and CSR Requirements. In 2021, no Albert Awards were presented as 2020 affected hotel operations in various ways, making a comparison between the hotels’ performance unsuitable.

5.4 Guest & Staff Activities

HOTEL DU CAP-EDEN-ROC
• 57 potential time slots were suggested to staff for four different CSR activities: Beehive, DIY and florist workshops and park visits
• Various stands were organized at the staff canteen for smoothie making, about the Mediterranean biodiversity and themed “city guide”
• The canteen offered food from Provence and a vegetarian menu
• Work with charities continued: 26 Giving bags were collected, Secours Populaire collects amenities etc. Sapocycle collects the solid soaps
• 20 CSR-specific Instagram posts/stories were published with a total of 201,979 views and 730 congratulatory reactions; 48 Pearl Net posts were published with a total of 1,165 likes
• Chefs work with several local ingredients and bakers with local flour “Lou Pan d’ici”
• A large variety of local products are offered such as Gin, beer, and honey from their own beehives (4 more were installed for 2022) and orange-chocolates with oranges from CSM
• Continued work with local and artisanal enterprises, two of which collaborated to create a table for Ville Saint Anne

BRENNERS PARK-HOTEL & SPA
• A visit to an organic vineyard was offered and conducted by the BPH wine club and a traditional apple harvest was conducted incl. juice production (160 litres)
• The “Weihnachtspäckchenkonvoi” is being organized again and the hotel started working with the Wishing Tree concept at the restaurant Rive Gauche
• Continued engagement with the Baden-Baden Bürgerstiftung and Rotary which hold meetings at the hotel
• A CSR calendar was established for 2022
• Information about soap recycling gathered from the hotels in the South of France and applicability in Germany is reviewed
• Participated in a music event, together with other local hotels and restaurants, to support local charities
• Several events are planned, including fruit and herb picking in summer
• Honeybees’ hives will be re-introduced to the hotel in 2022
• A CSR event is planned in conjunction with the annual Health week, which takes place in autumn.
5. Commitment III. Ensure Environmental Awareness

CHÂTEAU SAINT-MARTIN & SPA
- 21 time slots were suggested to staff for different CSR activities, which included: Beehive workshops, DIY workshops, visits to the park
- Honey from the beehives was included in the restaurant and canteen menus
- All guests participated in the scheme of having towels and sheets changed every two days
- 17 giving bags were used and donated to the Red Cross
- Secours Populaire and the Red Cross collect several bags of amenities, clothing etc. each month, solid soaps are collected by Sapocycle
- 21 CSR specific Instagram posts/stories were posted with 33,540 views in total
- 17 posts were published on PearlNet with 479 likes

THE LANESBOROUGH
- Maintained the activity that books which are left behind by guests and not picked up after 3 months are added to the community library in the staff canteen

L’APOGÉE
- A mountain cleanup operation was organized with the local NGO Montagne Propre. 20 employees participated and collected 30kg of waste, including around 600 cigarette butts. The NGO gifted pocket ashtrays to employees.
- Continued partnership with Vanoise National Park to protect the Ibex – an endangered species of wild goat.

PALÁCIO TANGARÁ
- Earth hour was celebrated in March
- 90% of guests participate in having their towels and sheets changed at a two-day interval
- All soaps are recycled by Granado Company, while plastics from other amenities are recycled with the general plastic waste
- The hotel ground is home to beehives and new ones are being installed, providing some of the honey purchased by the hotel

JUMBY BAY ISLAND
- Jumby Bay Shark Bait Swim to raise funds for the Jumby Bay Fund took place in Q3
- An island-wide cleanup was organized
- The collected items from rooms were gathered and donated to a local prison, shelters and hospices
- Big refillable bottles are now used for bathroom amenities

EDEN ROCK
- The Territorial Environment Agency was invited to raise awareness and inform the Hotel team about sea turtles as well as baby lemon sharks (see picture)
6. Commitment IV. Engage with Sustainable Communities

The Principles and Objectives set under Commitment IV. – Engage with Sustainable Communities are the following:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Favour local producers who guarantee the rich heritage of our region</td>
<td>By 2022 foster relationships with local and artisanal enterprises at each hotel</td>
</tr>
<tr>
<td>By 2022 work with and actively support local sustainable companies and enterprises</td>
<td></td>
</tr>
<tr>
<td>Commit alongside our partners in projects that are linked to the principles we defend</td>
<td>By 2022 establish a system to ensure partner collaborations at hotel level are guided by at least one of our CSR principles in order to promote those jointly</td>
</tr>
<tr>
<td>Support local communities engaged in the protection of environmental and social projects</td>
<td>By 2021 every hotel to engage in at least two long-lasting charitable projects where team members and guests can participate in</td>
</tr>
</tbody>
</table>

Alignment to SDGs:

| Material topics addressed: | Economic Growth |

CSR Requirements set to support the general achievement of Commitment IV. for 2021 are:

1. Indicate local (sourced within 200km from hotel) products and dishes in all room service and restaurant menus
2. Foster relationships with local and artisanal enterprises
3.-5. Provide CSR Questionnaire and information flyer to: 3. suppliers with greatest impact on hotel's costs; 4. main service companies and; 5. all partners
6. Support one local and one international charity
7. Support a charity which focuses on preserving one local species
8. Hold an annual staff environmental action day

Figure 18: Implementation of CSR Requirements – Sustainable Communities

The least performing requirements were the ones where hotels needed to reach out to their suppliers. This was most likely due to lacking capacity or missing communication in the departments and was noted by the CSR Team as an area for improvement. Furthermore, staff action days were rarely carried out by the hotels. However, food menus in almost all hotels met CSR Requirement 1 and the hotels cultivated existing and new relationships charities (Requirement 6) as well as with local, artisanal enterprises (Requirement 2). The overall score for Commitment IV. was 68%.
6. Commitment IV. Engage with Sustainable Communities

6.1 Property Actions, Charities & Donations

Oetker Collection coordinates its efforts with other organizations and initiatives to amplify and not negate or unnecessarily duplicate the efforts of other contributors. During 2021 – Q1 2022, many of the existing partnerships were upheld and new ones established. Overall, Oetker Collection hotels supported over 29 charities and NGOs through donations, fundraising events, free guest nights and meeting rooms as well as collaborative actions.

PALÁCIO TANGARÁ
- Maintained the relationships with the local and artisanal enterprises Helo Galvão and Hideko Honma for handmade ceramics and now also works with Atelier da Vila
- The work with local charities and NGOs CAMP, Salvation Army and Association Cruz Verde and Amigos do Bem continued as well as their work with the local bee company Mbee
- Many staff participated in the Earth Hour with their families at home

THE LANESBOROUGH
- To mark the occasion of #ThankYouDay, The Lanesborough went blue in honour of the NHS (National Health Service) and its friends at St. George's Hospital Charity and all the amazing work frontline workers have performed over the past 16 months - in celebration of the NHS's 73rd anniversary
- The restaurant’s menu is including more British dishes which also opens up opportunities for more local produce
- New collaboration with the charity Heartburn Cancer: donations are made per room night, F&B or Spa service
- The last Saturday in March was “energy-free” in celebration of Earth Hour
6. Commitment IV. Engage with Sustainable Communities

CHÂTEAU SAINT-MARTIN & SPA
• The hotel’s pastry chef created a special cheesecake with the honey from the hotel’s beehives (see also Commitment 3)
• Further to its other charity work, the hotel continued to collect corks for the Cancer Research Association and its partnership with the Birds Protection League to protect the owl

HOTEL DU CAP-EDEN-ROC
• Continued work with charities in addition to France Cancer, Secours Populaire and Sapocycle, also Les Restaurants du Coeur (food collection), Adrien (lunchtime for a sick child and its family), Thalas Expedition (partnership for an Ocean Protection expedition starting in 2023), National Forestry Office & Provence Alpes Côte d’Azur Region (tree planting to fight global warming)
• Old fabrics are given to a dressmaker (upcycled to clothes) and the Regional Chamber of Commerce (upcycled to tote bags)
• A beach clean up at Cap d’Antibes was planned together with a school

EDEN ROCK - ST BARTH
• Donations of clothes and a cleanup were organized
• The St Barth Triathlon association was sponsored (of which the Bar Manager at Rémy Bar is part of, see picture)
• To celebrate World Ocean Day on 8th June, 5% of every special of the day at the Sand Bar restaurant was donated to INE – the association which restores the coral reefs in the bay of St Jean
• Several events were organized, including a fundraiser for UNICEF
• Giving bags are donated to the Red Cross

LE BRISTOL
• The hotel provided vouchers for two fundraising events – one for a complimentary stay at the hotel was auctioned to raise funds for Cornell Hotel Society to provide scholarships; another for a dinner at the 114 Faubourg restaurant was a raffle prize, to support “Croq l’Espoir”, a charity that supports children with cancer

BRENNERS PARK-HOTEL & SPA
• Continue support of a variety of local charities
• The homemade apple juice was served to guests (see also Commitment 3)
• Many products are sourced from local companies, from coffee roasters and winemakers to bakers and butchers
• The hotel supports several NGOs, including youth shelters, community organizations and animal shelters
• Financial donations are made to these organisations, but the hotel also sometimes provides event space and equipment

JUMBY BAY ISLAND
• All restaurant menus include a section with plant-based options since the start of the new season. The Kids Menu now also includes healthy choices
• The hotel works with local artists Naydene Gonnella and Jo de Pear
• Paintings from the local artist Ronald Silencieux have been used for the design of the macaroon boxes, which are part of the welcoming amenity
• Continued its work with the Jumby Bay Fund
• Food Parcel Program was undertaken in relation to Covid-19
• Several fundraising events were organized, including a “Shark Bait Swim”, raising funds for the Hawksbill Turtle Program and a concert by the Kanneh-Mansons to support Antigua Youth Symphony Orchestra
• Bathroom amenities, discard linens and lost and found clothing items are donated to A&B Prison and Women’s Shelter
7. Moving Forward

7.1 CSR Requirements Outlook 2022

The CSR Requirements are reviewed on a yearly basis to establish tangible actions for the Oetker Collection CSR Strategy, which are to be implemented at each property in their own context. For 2022, requirements were communicated to hotels with additional measurement requirements.

The CSR Requirements aligned to the Principles & Objectives for 2021 are:

**CSR Strategy & Structure**

1. A designated Team Member of the hotel's ExCo is assigned and communicated as responsible for CSR Management
2. The hotel has established a structure of responsibilities to manage and action strategic and operational CSR initiatives (e.g. CSR Team, CSR Intern, etc.).
3. The Head of People & Culture is an integral part of the responsibility structure
4. The Data Monitoring System is installed and updated at least on a monthly basis

**I. Human Rights**

1. Management actively works against harassment with specific actions and initiatives
2. All leadership of the hotel are trained in preventive harassment management
3. Oetker Collection's system to anonymously report incidents is properly communicated to all team members
4. Management endeavours to employ team members with a physical disability
5. All team members have access to the Oetker Collection E-learning platform

II. Consume Responsibly:

1. Infrastructural improvements are identified, planned and conducted to reduce the property’s energy consumption
2. Infrastructural improvements are identified, planned and conducted to reduce the property’s water consumption
3. Team members are continuously encouraged and educated to use water & energy responsibly
4. Awareness campaigns are executed to increase team member awareness regarding the hotel’s carbon footprint and actions, how to minimize it
5. Carbon KPIs are continuously reviewed
6. The hotel is committed to the protection of at least 1 species within the surrounding area
7. Waste generation of the most relevant waste types is measured and updated on the data platform Con-Serve™ monthly
8. Waste reduction actions are defined based on the corporate Toolkit on Waste management
9. All cups and cutlery used in the canteen and any other area of the hotel, is made of reusable and sustainable material
10. All in-room items (e.g. bottles, laundry bags, slippers sleeves, newspapers bags) are made of sustainable and non-single-use material
11. Coffee capsules are made with a B2B service or replaced with biodegradable capsules, or other sustainable options
12. The coffee capsule recycling or composting program is communicated to guests
13. Only organic fertilizers and pesticides are used
14. At least 70% of all cleaning products purchased are eco-friendly (based on cost)
15. A fleet of sustainable vehicles is provided to guests
16. An employee car-sharing scheme is implemented, where public transport is not available
II. Consume Responsibly (continued):
17. The OC Responsible Purchasing Policy is communicated to all new and existing suppliers
18. Bulk purchasing procedures are followed to reduce transport and packaging in all hotels
19. The CSR Supplier Survey is sent to all main suppliers, main service companies and all partners
20. Survey replies are collected from at least 50% of a hotel's suppliers
21. The hotel engages in a dialogue about OC's CSR principles during supplier selection
22. Supplier survey replies are used to engage suppliers on CSR and explore where there is room for improvement

III. Ensure Environmental Awareness
1. Progress on CSR requirements is reported on a quarterly basis to the corporate office
2. At least one CSR guest experience is offered
3. At least three CSR events to engage team members are organized per year
4. At least one CSR education day is organized, which informs the entire hotel about a respective topic
5. Guests are offered various options to participate in our sustainable service offering
6. The overall CSR engagement is accordingly communicated on the hotel's website and up to date
7. At least one story per month with CSR-related content is posted on the hotel's Instagram channel (saved as a highlight) with the respective hashtag and on PearlNet
8. For every quarter, one CSR achievement is posted on PearlNet and on the hotel's public Social Media Channels
9. Imagery for sustainable communication purposes is collected and stored in the Oetker Collection Press Office (OPO) for global use

IV. Engage with Sustainable Communities
1. Relationships with local and artisanal enterprises are actively fostered and maintained
2. The hotel works with and actively supports local sustainable producers
3. Local (sourced within 200km from hotel) products and dishes are indicated in all room service and restaurant menus
4. A system is in place to ensure all partner collaborations at hotel level are in line with the CSR principles
5. The hotel engages dialogue about the CSR principles with its partners to promote those jointly
6. At least two long-lasting charitable projects are maintained where team members and/or guests can participate in
## 8.1 GRI Index

<table>
<thead>
<tr>
<th>GRI DISCLOSURE NUMBER</th>
<th>DISCLOSURE TITLE</th>
<th>DISCLOSURE / REPORT LOCATION</th>
<th>PAGE</th>
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<tbody>
<tr>
<td>102 – 1</td>
<td>Name of the organization</td>
<td>Oetker Collection</td>
<td>3</td>
</tr>
<tr>
<td>102 – 2</td>
<td>Activities, brands, products, and services</td>
<td>Oetker Collection is a hotel collection of 10 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.</td>
<td>3</td>
</tr>
<tr>
<td>102 – 3</td>
<td>Location of headquarters</td>
<td>Lichtentaler Strasse 92, Baden-Baden, 76530</td>
<td>3</td>
</tr>
<tr>
<td>102 – 4</td>
<td>Location of operations</td>
<td>Germany, France, Great Britain, St Barthelemy, Antigua, Brazil, Switzerland</td>
<td>3</td>
</tr>
<tr>
<td>102 – 5</td>
<td>Ownership and legal form</td>
<td>Oetker Collection is managed by the German company Oetker Hotel Management Company GmbH (OHMC).</td>
<td>3</td>
</tr>
<tr>
<td>102 – 6</td>
<td>Markets served</td>
<td>a. Markets served, including: i. Antibes (France), Antigua (private island), Baden-Baden (Germany), Courchevel (France), London (Great Britain), Paris (France), Sao Paulo (Brazil), St Barthélemy (France), Vence (France), as well as Geneva (Switzerland, from 2021) ii. Tourism industry - hospitality iii. Individuals from worldwide markets</td>
<td>3</td>
</tr>
<tr>
<td>102 – 7</td>
<td>Scale of the organization</td>
<td>a. Scale of the organization, including: i. 1883 employees across the Collection ii. Management Company + 10 hotels iii. Total business volume of the Collection: 211M€ v. Hotels: around 155,000 room nights per year (pre-pandemic times)</td>
<td>3</td>
</tr>
<tr>
<td>102 – 8</td>
<td>Information on employees and other workers</td>
<td>Refer to Section 3.1 HR Key Figures</td>
<td>22</td>
</tr>
<tr>
<td>102 – 9</td>
<td>Supply chain</td>
<td>Refer to Section 4.3 Sustainable Purchasing</td>
<td>33 ff.</td>
</tr>
<tr>
<td>102 – 10</td>
<td>Significant changes to the organization and its supply chain</td>
<td>a. Significant changes to the organization's size, structure, ownership, or supply chain, including: i. Refer to section 1.2 Reference Framework ii. Refer to section 1.5 Company Structure 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.</td>
<td>3-4</td>
</tr>
<tr>
<td>102 – 11</td>
<td>Precautionary Principle or approach</td>
<td>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.</td>
<td>–</td>
</tr>
<tr>
<td>102 – 12</td>
<td>External initiatives</td>
<td>Refer to Section 1.0 Introduction, Section 1.4 Reporting Structure and Content, Section 2.1 Corporate Social Responsibility at Oetker Collection, Section 3.2 Human Rights and Labour Laws</td>
<td>3-4/9 ff./23 ff.</td>
</tr>
<tr>
<td>102 – 13</td>
<td>Membership of associations</td>
<td>a. Virtuoso</td>
<td>3</td>
</tr>
<tr>
<td>GRI DISCLOSURE NUMBER</td>
<td>DISCLOSURE TITLE</td>
<td>DISCLOSURE / REPORT LOCATION</td>
<td>PAGE</td>
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<tr>
<td>102 – 14</td>
<td>Statement from senior decision-maker</td>
<td>Refer to Section 1.5 CEO's Foreword</td>
<td>5</td>
</tr>
<tr>
<td>102 – 16</td>
<td>Values, principles, standards, and norms of behaviour</td>
<td>a. Refer to 2.1 Corporate Responsibility at Oetker Collection, as well as Code of Conduct described under Section 3.2 Human Rights and Labour Laws, 4.1 organisation Overview</td>
<td>9 / 23 ff. / 31</td>
</tr>
<tr>
<td>102 – 18</td>
<td>Governance structure</td>
<td>a &amp; b. Executive Committee Of Oetker Collection, Refer to Section 3.2 Human Rights and Labour Laws, Section 4.1 Organisation Overview</td>
<td>23 ff. / 31</td>
</tr>
<tr>
<td>102 – 40</td>
<td>List of stakeholder groups</td>
<td>Refer to section 2.4 First CSR Strategy</td>
<td>11</td>
</tr>
<tr>
<td>102 – 41</td>
<td>Collective bargaining agreements</td>
<td>100% of Oetker Collection employees are covered by collective bargaining agreements.</td>
<td>23</td>
</tr>
<tr>
<td>102 – 42</td>
<td>Identifying and selecting stakeholders</td>
<td>Refer to section 2.4 First CSR Strategy</td>
<td>11 ff.</td>
</tr>
<tr>
<td>102 – 43</td>
<td>Approach to stakeholder engagement</td>
<td>Refer to section 2.3 Stakeholder Engagement in CSR Activities</td>
<td>11</td>
</tr>
<tr>
<td>102 – 44</td>
<td>Key topics and concerns raised</td>
<td>Refer to Section 3.2 Human Rights and Labour Laws, Section 3.3 Fair Operating Practices, Section 4.1 Organization Overview</td>
<td>23 ff./ 26 ff./ 31</td>
</tr>
<tr>
<td>102 – 45</td>
<td>Entities included in the consolidated financial statements</td>
<td>a. OHMC b. Not Applicable</td>
<td>–</td>
</tr>
<tr>
<td>102 – 46</td>
<td>Defining report content and topic Boundaries</td>
<td>Refer to Section 1.2 Reference Framework and Section 1.4 Reporting Structure and Content</td>
<td>3-4</td>
</tr>
<tr>
<td>102 – 47</td>
<td>List of material topics</td>
<td>Refer to Section 2.4 First CSR Strategy</td>
<td>11 ff.</td>
</tr>
<tr>
<td>102 – 48</td>
<td>Restatements of information</td>
<td>Refer to Section 4.2 Environmental Monitoring</td>
<td>31 ff.</td>
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</tbody>
</table>
### 8. Appendix

<table>
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<th>GRI DISCLOSURE NUMBER</th>
<th>DISCLOSURE TITLE</th>
<th>DISCLOSURE / REPORT LOCATION</th>
<th>PAGE</th>
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</thead>
<tbody>
<tr>
<td>102 – 50</td>
<td>Reporting period</td>
<td>Refer to Section 1.2 Reference Framework</td>
<td>3</td>
</tr>
<tr>
<td>102 – 51</td>
<td>Date of most recent report</td>
<td>Corporate Sustainability Report 2020 (published July 2021)</td>
<td>–</td>
</tr>
<tr>
<td>102 – 52</td>
<td>Reporting cycle</td>
<td>Refer to Section 1.2 Reference Framework</td>
<td>3</td>
</tr>
<tr>
<td>102 – 53</td>
<td>Contact point for questions regarding the report</td>
<td>Xenia zu Hohenlohe, considerategroup.com</td>
<td>50</td>
</tr>
<tr>
<td>102 – 54</td>
<td>Claims of reporting in accordance with the GRI Standards</td>
<td>Refer to Section 1.4 Reporting structure and content</td>
<td>4</td>
</tr>
<tr>
<td>102 – 55</td>
<td>GRI content index</td>
<td>Refer to Section 8.1 GRI Index</td>
<td>46-48</td>
</tr>
<tr>
<td>102 – 56</td>
<td>External assurance</td>
<td>For the 2021/22 Oetker Collection Group report external assurance was not requested, however for future reports Oetker Collection will evaluate practice.</td>
<td>–</td>
</tr>
<tr>
<td>302 – 4</td>
<td>External assurance</td>
<td>Refer to Section 4.2 Environmental Monitoring</td>
<td>31 ff.</td>
</tr>
<tr>
<td>305 – 5</td>
<td>Reduction of energy consumption</td>
<td>Refer to Section 4.2 Environmental Monitoring</td>
<td>31 ff.</td>
</tr>
<tr>
<td>308 – 1</td>
<td>Reduction of GHG emissions</td>
<td>Refer to Section 4.2 Environmental Monitoring and 4.3 Sustainable Purchasing</td>
<td>31 ff. / 33 ff.</td>
</tr>
</tbody>
</table>
### 8.2 2015, 2017 and 2018 Objectives

A summary of the 2015, 2017 and 2018 objectives and their status quo are included in Table 5. Those that were not achieved have been carried through to the 2019 strategy.

**Table 5: 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**

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

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.

8.3 Further Information

Documents mentioned throughout the report can be available upon request.

For further information please contact, Xenia zu Hohenlohe
xzh@considerategroup.com