



OETKER COLLECTION

MASTERPIECE HOTELS

COMMUNICATION ON PROGRESS

Global Compact



PATRONS FOR A SAFE AND
GUARANTEED FUTURE

2014

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I. GENERAL INFORMATION

I.1. Oetker Collection strategy



Frank Marrenbach, CEO

The Oetker Collection is a collection of exceptional hotel establishments.

Being part of the Oetker Collection produces a standardised framework which defines a vision, values and responsibility principles that are shared by all establishments.

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

This guest status is a creed that is expressed everywhere, in particular through:

- The Oetker Collection Constitution which embodies the importance attached to guests: Our local or international guests are our top priorities. We strive to satisfy their every desire. We do our utmost to anticipate their expectations and fulfil them to the best of our ability with a meticulous attention to detail. As far as we are concerned, “high touch” outweighs “high tech”.
- The 6 values that are geared towards guest satisfaction and expected of the staff are authenticity, reliability, joy, subtlety, humility and creativity.
- The quality program “ENCORE” TQM is focused on total guest satisfaction.

We are aware of the fact that our guests are not only consumers but also citizens who are concerned about the well-being of the planet. Certain of them are deeply committed to defending environmental and social causes. We believe that being part of the Oetker Collections should be synonymous with a respect for persons and nature. The value we share with our guests brings us closer.

Our commitment in favour of Social Responsibility which contributes to Sustainable Development extends beyond a simple stance:

- It is directly related to our business model
- It is a strategic lever
- It is an instrument to drive change
- It is distributed to all the operational and functional departments which are on the front line (a dedicated CSR structure providing the driving force and playing an expert and coordinating role)
- It is understood and embraced by all employees

Our membership of the **Global Compact** is a major element of our commitment. We have thus joined the community of organisations which support this exemplary initiative and we have committed in particular to bring our strategy, governance and decision-making processes into line with the principles of the Global Compact.

These principles are consistent with our values and the seven social responsibility principles of the ISO 26000 which we also refer to: accountability, transparency, ethical behaviour, respect for stakeholder interests, respect for the rule of law, respect for international norms of behaviour and respect for human rights.

Julie Poirot, under the responsibility of Philippe Perd, is in charge of implementing our CSR strategy within the Oetker Collection. A report will be prepared on this implementation to comply with the requirements of the Global Compact which will also take into account the recommendations of the **Global Reporting Initiative version 4** and the European Directive on Non-financial Reporting.

The Oetker Collection has chosen to honour its social, societal and environmental commitment by adhering to the Global Compact and by reporting on the progress accomplished by the establishments of the Collection each year. It has also chosen to be assisted by the English association, "CONSIDERATE HOTELIERS", which is specialised in helping hoteliers in this sustainable development approach.

I.2. Oetker Collection Profile

The history of the Oetker Collection hotels began in Cap d'Antibes in 1870 when writers made the magnificent Villa Soleil their haven of inspiration. The Hotel du Cap-Eden-Roc was born.

Meanwhile in 1872 in Baden-Baden, a hotel with classic French charm opened, welcoming guests like the Shah of Persia and the young British King, Edward VII, and soon became the internally renowned Brenners Park-Hotel & Spa.

In 1925 Le Bristol was built as one man's personal vision, offering both elegance and discretion at the heart of the Paris business centre. In less than a century, Le Bristol Paris has been owned by only two families: the Jammet family and now the Oetker family.

In 1900 a Polish Count bought the ruins of a chateau in Vence in the backcountry of Nice with the firm intention of restoring it into a religious place of worship: this peaceful retreat with its rich historic past was to become home to the Chateau Saint Martin & Spa.

The Oetker Collection has continued to seek new hotels that share its values and discreet style. More recently, the Palais Namaskar, one of the most alluring hideaways in North Africa, has joined the Collection. This was soon followed by the Fregate Island Private in the Seychelles in July 2013 and L'Apogée Courchevel in December 2013. The Eden Rock - St Barth's is now the latest masterpiece in this unique collection of hotels in the world.

VISION

The Oetker Collection is the most prestigious selection of masterpiece hotels in the world. Each property has a soul which is carefully nurtured by fine hoteliers who create a strong sense of belonging for our guests.

MISSION

We are fine hoteliers who share the same values and goals. We are conscious of the fact that we belong to an exclusive network which aims to contribute to the well-being of its partners. Our guests, whether they are local or international, are at the heart of all our efforts.

We constantly aim to exceed their expectations by delivering the highest level of products and services with a meticulous attention to detail.

Pure sensations outweigh High-Tech.

AWARDS

The Oetker Collection hotels regularly receive acclaim in numerous international media, including the most serious British and American magazines.

Relais & Châteaux Trophy 2014: The Château Saint-Martin & Spa received the award again for the 'Trophies 2014'

Villégiature Awards: The Château Saint-Martin & Spa was rewarded as being the “Best Charming Hotel in Europe”.

Andrew Harper: Le Bristol Paris was classed 10th among the best hotels in the world (capitals category) and the Hotel du Cap-Eden-Roc, 13th in the best seaside resort category.

Conde Nast Traveller: Le Bristol won the trophy as the best hotel in Europe. The Hotel du Cap-Eden-Roc was classed 4th in the same category. Brenners Park-Hotel & Spa was ranked 3rd in the best Spas

category. Fregate Island Private was 17th in the Africa, Middle East and Indian Ocean regions. In the Top 100 hotels category, Le Bristol was ranked 19th, Brenners Park-Hotel & Spa 28th and Hotel du Cap-Eden-Roc 69th.

International Traveler: The Hotel du Cap-Eden-Roc was ranked 1st among the Top 100 Hotels & Resorts in the world in a category which also included Le Bristol Paris.

Robb Report: The Palais Namaskar was named the Best Hotel of the Year in its 2013 report.

Luxury Travel Advisor: The bar of Le Bristol Paris was named the Best Bar Hotel in the world.

I.3. Determining the issues

In order to have a better understanding of Social Responsibility issues as they are applied to establishments such as those of the Oetker Collection, we asked the CSR France firm to carry out an assessment in 2013. This assessment covered the 7 core subjects of the ISO 26000 international standard which lays down the scope of Social Responsibility for an organisation.

The analysis focused on the hotels of the Cap-Eden-Roc and Château Saint-Martin & Spa

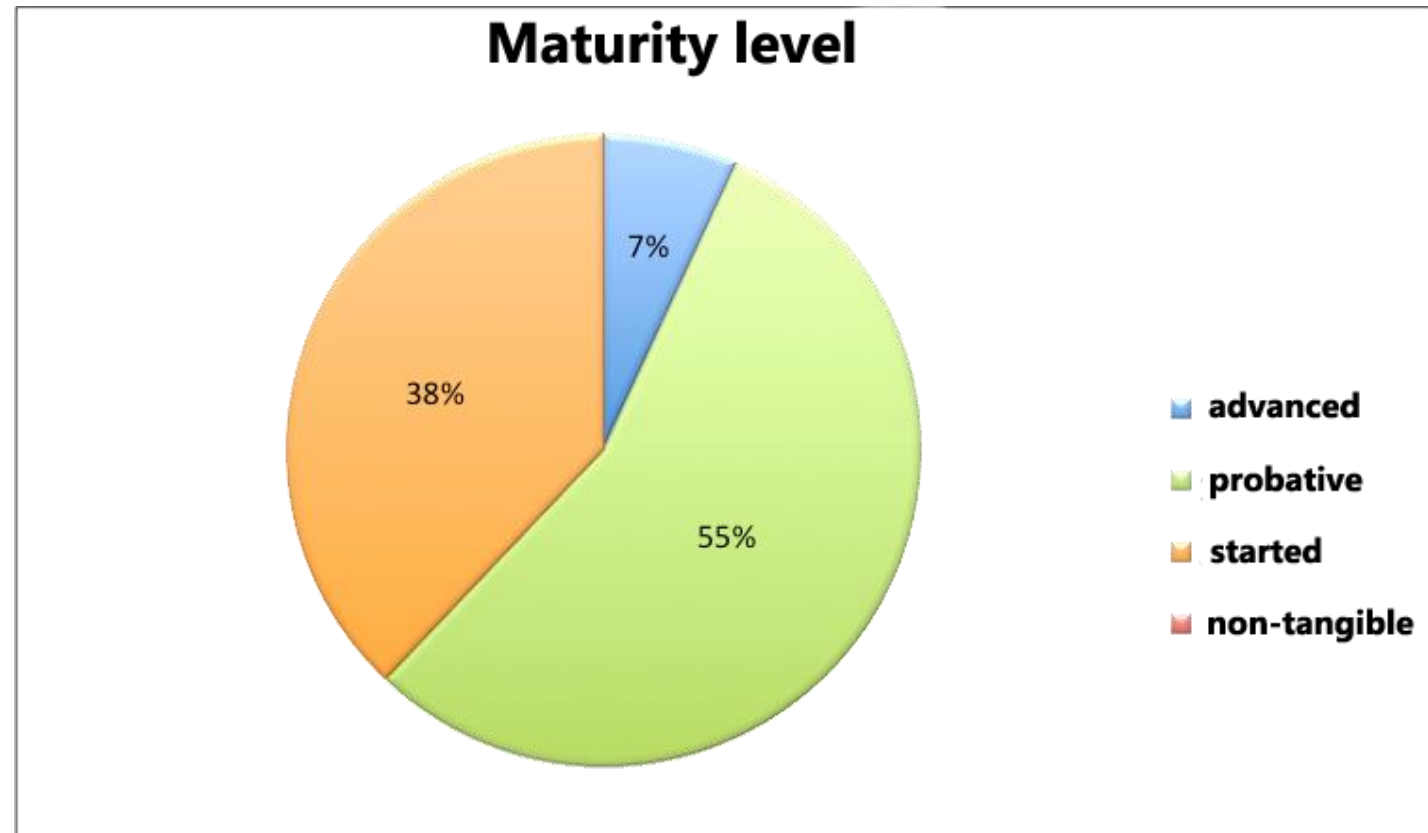
The 36 subject areas listed by the ISO 26000 were reviewed. 6 additional subject areas were reviewed with regard to governance (Afnor X 30-031 benchmark document).

The assessment used by the CSR France firm followed the logic of the PDCA (continuous improvement: Plan-Do-Check-Act) and analysed both the relevance of the policies in place and the extent of the implementation and communication on initiatives and results.



Out of the 35 fields of actions which were deemed to be relevant, the findings of CSR France were the following:

- The assessment focused on median levels
- No field was found to be at level 1, which means that the social responsibility issue has been taken into account
- The commitment was not found to be conclusive on more than a third of the fields of action



The assessment highlighted the following:

- “The establishments are clearly committed to social responsibility objectives that are linked to their core business which prioritised the interests of guests”
- Abundant, internal communication gives a good visibility of the organisation’s strategic directions for employees. On the other hand, external communication (on CSR) lags behind.

- A very good level of implementation of its preferred subjects (training, skills development ...) ensures that the human capital is of a very high standard.
- Business processes are described and assessed regularly using effective tools.
- The architecture and processes attached to monitoring the ethics of operations must be improved to ensure a conclusive surveillance of the main risks generated by the activity.
- The owners, who are the sole stakeholders represented on the Board, are satisfied with governance even though it can be improved from a SR point of view.
- Certain issues (safety, remuneration, environment, suppliers, region ...) are only partially dealt with despite the fact that they are potential risk carriers.
- The challenge for the organisation is to draw up a unique, harmonised SR policy which is sufficiently flexible to take into account different historical, social, geographical and capitalistic contexts.
- One improvement (on a governance level) concerned the involvement of the stakeholders.

The assessment referred to a relation / cooperation with the stakeholders which could be strengthened by measures that:

- identify the priority stakeholders regarding the impacts of the decisions and activities of the organisation, the risks and opportunities linked to these stakeholders and to the form of dialogue to be favoured depending on the stakeholder (transactional array ranging from simple information to the co-construction of solutions, and including consultation, cooperation ...)
- understand their interests depending on the subjects in question (chain of value, region, professional sector, etc.);
- include these interests in decisions with possible arbitration.»

1.4. Involvement of the stakeholders

We thus launched a major project in 2014 with the aim of drawing up a map of our stakeholders:

✚ Our stakeholders can be classed into 9 categories:

SHAREHOLDERS

Oetker Collection

EMPLOYEES

Administrative staff

Accommodation staff

Dining staff

Technical staff

Sensitive members

Future employees

GUESTS & CONSUMERS

Resident guests

External guests

Prospective guests

PARTNERS

Service partners

Representatives

Oetker partner hotels

Relais & Châteaux

COMMUNITIES, CIVIL SOCIETY & NGOs

Red Cross association

The Aquanauts association

Planète Urgence association

Various local associations

Neighbours

NATURA 2000

SUPPLIERS

Partner suppliers

Key account suppliers

Local suppliers

PUBLIC AUTHORITIES & COMPLIANCE

Social bodies

Tax bodies

Regulatory bodies

Safety commission

Certification

Green Globe

MEDIA & COMMUNICATION

VIP Press (Gala, Figaro ...)

Generic press (Innovation SPA, Nice RV)

TV

PR agencies

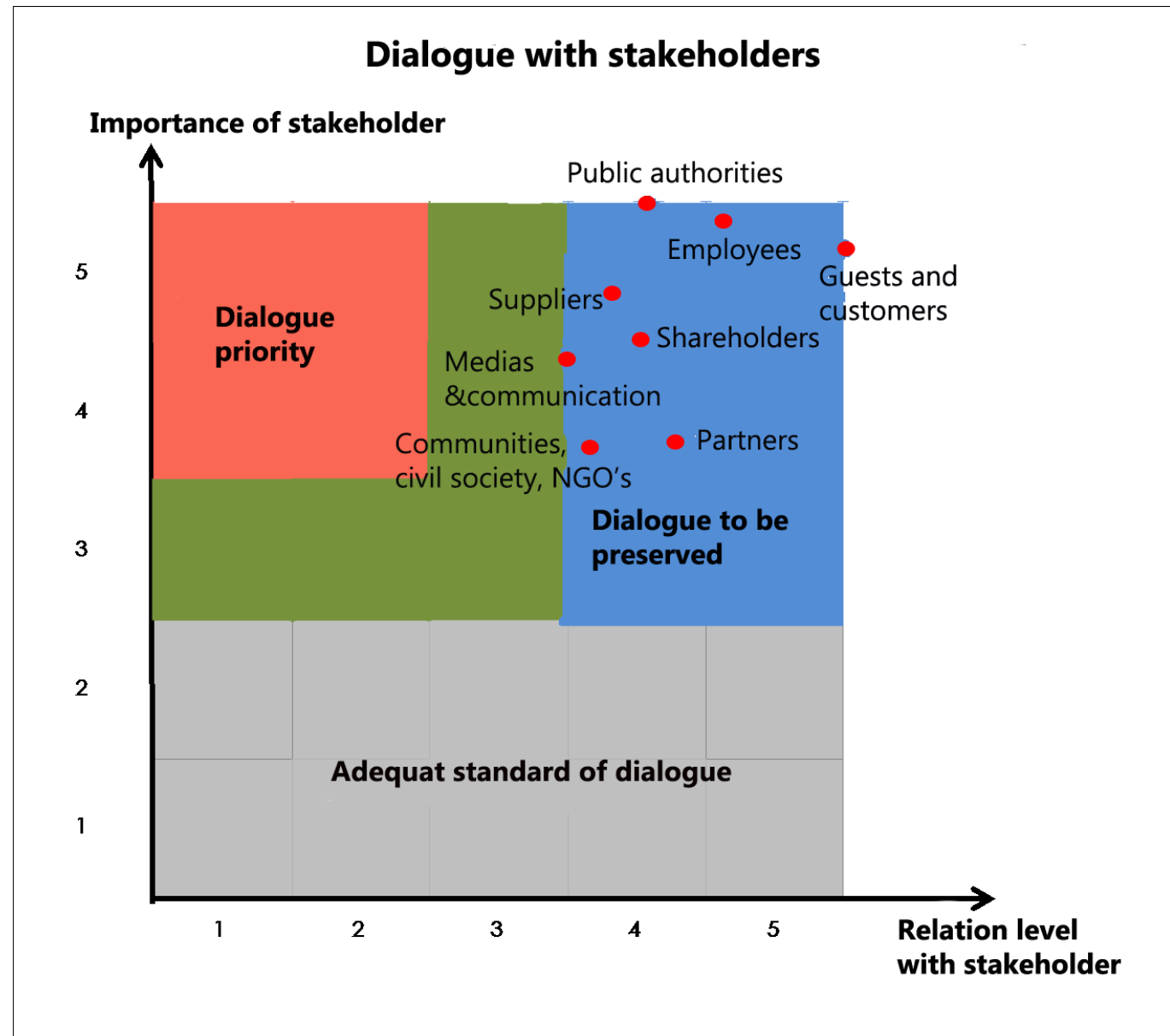
Internet social networks

Shows & exhibitions

Vocational training schools

Trade unions

We have established dialogue priorities with the stakeholders:



I.5. Overview of our report

This report mainly focuses on the policies, managerial practices and performances obtained in two reference hotels: the Hotel du Cap-Eden-Roc and the Château Saint-Martin & Spa which are today the pilot establishments of our sustainable development approach. The approach is in the process of being implemented in other establishments but this report will present significant initiatives which have already been undertaken in these establishments. Based on the GRI4 guidelines, this report indicates:

- 1) the G4 general standard disclosures corresponding to the Core option (the essential criteria)
- 2) the specific standard disclosures and at least one indicator linked to material aspects of each of the four GC key issues
- 3) the specific standard disclosures and at least one indicator linked to any other aspect that we consider to be material



I.6. Governance

The CSR France assessment highlighted several **strong points** concerning our governance methods:

- Being part of the Oetker Collection produces a standardised framework which defines a vision, values and responsibility principles that are shared by all establishments.
- Regular communication involving employees (suggestion box which allows for proposals to be submitted anonymously, meeting forums with Management, results of the Opinion Survey on their satisfaction are sent to all personnel and Direct Line system).
- The establishments have a strong culture of permanent financial reporting to the shareholders.
- The decision-making processes and structures have been significantly professionalised over the past few years.
- Clear delegations of authority and a unified Executive Committee allow for an effective management, implementation and supervision of the decisions taken.
- In addition to an official communication of the financial statements, efforts are made to communicate with other stakeholders, staff, guests, suppliers and authorities.

The CSR France assessment nevertheless underpinned areas where there was room for **progress**:

- Within the framework of the integration of social responsibility in the organisation, the values with the seven ISO 26000 social responsibility principles had to be validated and asserted.
- Strengthen the relation / cooperation with the stakeholders and ensure that the decision-making processes specify the involvement of the stakeholders.
- Not to reduce management to a monitoring of results or to underlining discrepancies but provide a recognition of the objectives reached and strategic and/or operational support in the event of a problem.
- Through communication, make known and ensure transparency in particular on the values and vision, the relevance of the choices and objectives made in view of the significant impacts and expectations of the stakeholders, developments in performance, the effectiveness of dialogue with the stakeholders and the decision-making mechanisms/bodies and the progress of the approach over time.

The major project on the stakeholders, the adhesion to the Global Compact and the preparation of our first CSR report have provided the first clear improvements on these issues.

Communication on sustainable development – Governance

Below is an excerpt of the 2015 CSR overall action plan concerning the management policy and Social Responsibility strategy at the Oetker Collection:

OVERALL OBJECTIVES	OVERALL ACTIONS
Creation of a CSR identity	Search for commitments, principles, objectives, logo and slogan in line with the OC basic values
Score of 60 % on CSR audits	1 st audit in July 2014
	2 nd in September 2015
The COP Global Compact is sent annually	COP Global Compact
90 % of employees are sensitive to CSR	Preparation of a CSR booklet
	Preparation of an OC Global Ethical Charter
	Training on eco-gestures / CSR subjects
	Insertion of CSR questions (47 and 49) in the Opinion Survey: "I have been informed and I understand the CSR approach", "I have been asked to take part in CSR actions by my Head of Department", "I comply with the eco-gestures of my department" and a score of 4 in 2015 (See: P.15)
	Inclusion of a CSR section in each induction
	CSR TEAM: Voluntary team from the administrative and operational department with a meeting each month. Company grants ½ day to work on CSR (See: P. 16)
	Each CSR Team is placed in competition with each other with a reward at the end of the year: stay in the Hotels
	Monthly election of the CSR QASE along the same lines as the QASE (See: P. 17)

At the Hotel du Cap-Eden-Roc, awareness on environmental issues is very strong and is based on sustainable development training courses which are attended by all employees.

In 2014, 164 persons received trained on various subjects such as:

- Waste sorting**
- Eco-gestures at work**
- Use of eco-labelled products**
- Eco-conduct**

During the induction meeting, the CSR policy is presented to all seasonal staff. In the afternoon, the seasonal staff is able to visit the stands (CSR, HR and quality) in groups of 20. The environmental policy and the Sustainable Development Management Plan are available on the Intranet.

Below are the results of the CSR questions in the anonymous social climate questionnaire which is filled in each year by employees in order to voice their opinions on life in the company, the Opinion Survey:

Hotel du Cap-Eden-Roc monitoring: GOVERNANCE							
Awareness of our employees: 90 % to be made sensitive in 2015							
Overall objective: score of 4 to CSR questions in 2015							
YEAR	Question	Score	Planned increase	Provisional score	Actual increase	DATE OF THE MONITORING	OBJECTIVE REACHED
2014	47	4.11	0.1	3.93	0.28	Dec-14	Yes
	48	3.89	0.1	3.7	0.29		Yes
	49	4.47	0.1	4.47	0.1		Yes
2015	47		0	4.11		Dec-15	
	48		0.2	4.09			
	49		0	4.47			

We can see that the results of the CSR questions in the Opinion Survey for the Hotel du Cap-Eden-Roc were promising in 2014 and should allow for the objective set of 4 in 2015 to be achieved.

Group objective for 2015:

Raise the awareness of 90 % of our employees on Social responsibility



The CSR Team of L'Apogée in Courchevel

According to the overall objects of CSR (Corporate Social Responsibility), Oetker Collection would like to involve the teams of each Hotel in a Sustainable Development project. The CSR Teams are committees that are comprised of voluntary persons who are sensitive to this issue and which have been created to meet these objectives.

L'Apogée Courchevel is proud to present the “Apo-gestures Team” which is the first CSR Team to have been set up. It is comprised of ten dynamic persons from a variety of departments (pâtisserie/bakery, floors, kitchen, reception, room service, porter and sommelier).

The project, which is at the initiative of the “Apo-gestures Team”, is the organisation of a “Clean Nature” action. Its aim is to increase the awareness of the Apogee staff, Courchevel schools and any voluntary member of the public on the quantity of litter left at the resort during the season.

The event will take on the eve of spring 2015 in the commune of Courchevel.





CHATEAU SAINT-MARTIN & SPA
COTE D'AZUR – VENCE – FRENCH RIVIERA

CSR Quality Award of Service Excellence



We would like to involve the Oetker Collection teams and foster CSR on a daily basis.

To achieve this, CSR QASEs will be elected throughout the year. The goal is to reward the employee who has carried out a remarkable CSR action by following in particular the eco-gestures of their department.

The awarding of the diploma takes place after the draw. The CSR QASE is given a diploma and a Natura Box with a value of €130. A photograph is then taken with all the Heads of Department, the Executive Committee and the CSR QASE nominees.

At the end of the season, an annual CSR QASE election is organised during the staff gala with the 6 nominees elected by the Executive Committee.

The 2014 winner at the Château Saint-Martin was Fabiola ZIEGLER, a multi-task receptionist for her constant savings in paper consumption and her commitment to use a minimum quantity of energy at the hotel during the night.

She received an annual CSR QASE diploma and a night for two people at the Green Ecolodge in La Colmiane <http://www.greenecolodge.com/>.

I.7. Ethics and integrity

Our Social Responsibility commitment is, by definition, placed within the scope of ethics. All our behaviour must reflect this requirement which can be seen in particular by:

- Compliance with the rules and regulations in force in the countries in which our hotels operate.
- Compliance with the international standards of behaviour that are promoted by lawful international institutions (UN, ILO, OECD ...).

Regarding more specifically the business ethics section, the CSR France assessment highlighted several strong points:

- Significant progress in the transparency of transactions.
- Ban on marketing an archaeological relic or object.
- Ban on guests marketing products in the hotels.
- A commitment on compliance with social and environmental norms by the subcontractors.
- Search for a balanced and long-term relation with its suppliers and subcontractors is favoured.
- Respect for property rights.

Nevertheless, our policy was found to be insufficiently formalised as there was no reporting of the actions to demonstrate the level of commitment and the anti-corruption system was partial. Several actions have allowed for these shortcomings to be remedied.

I.8. General standard disclosures on the hotel sector

Below are some of the trends in the tourist market in the world per theme:

Asia

China became the first market in the world in 2012 with expenses of \$102 billion in international tourism.

In 2020, 250 million tourists will leave China with 100 million Chinese being able to offer themselves luxury products.

In 2020, the Asians will be the third most important consumer in world tourism.

Emerging markets

Travellers from emerging markets: the Russian Federation (before the political crisis) with US \$43 billion increased by 32 % and Brazil recorded expenses of US \$22 billion in 2012.

Large-scale investments in emerging countries will increase the choice for travellers. It will be an opportunity to increase the competition and drop prices/margins.

In the emerging markets, the rise of the medium classes will lead to a new demand in leisure activities and business tourism.

New technologies

To succeed in 2015, host companies must invest in technology with the development of applications and Websites for mobile phones to meet consumers' demands.

62 % of French tourists who went on holiday decided to prepare or book their holiday on the Internet.

29 % of web users used their Smartphone to prepare or book their leisure stays.

The use of mobile phones will exceed computers in 2015.

Wealthy guests expect one thing from their on-line experience: the availability and possibility of communicating directly, quickly, easily and immediately.

Luxury

Luxury brands must recognise the critical importance of brand values and service values as the essential basis for creation and always offer an extraordinary customer experience.

Economy and Political outlook

With more budgetary austerity and the tightening of financing conditions, economic growth will remain low in Europe.

Social unrest, terrorist threats and racial tensions continue to be the main factors in choosing a destination.

The OECD forecasts a high rate of unemployment: 11.4% by the end of 2015.

Sustainable development is in the process of becoming a new sustainable policy and numerous companies are developing

Guests look for more activities during their trip, in particular experiences geared towards authenticity and environment protection.



II. SPECIFIC STANDARD DISCLOSURES

II.1. The Oetker Collection Social Responsibility Strategy

II.1.a 2014 Overview

Assessment

The first action that was carried out by the Executive Committee of the Oetker Collection was to appoint a CSR officer in each hotel:

List of OC CSR OFFICERS		
HOTEL	NAME	POSITION
BPH	Christof KELLER	Deputy manager
PNM	Hakim HEDDOUCHI	Technical manager
	Matthieu BOURDON	Technical manager
BRISTOL	Adrian WILLIAMSON	Stewarding manager
	Diego GUERRESCHI	Restaurant manager
FIP	Jean Alexis COSTA	Manager
ERSB	Julie POIROT	CSR Coordinator
HDCER	Julie POIROT	CSR Coordinator
CSM	Julie POIROT	CSR Coordinator
APOGEE	Julie POIROT	CSR Coordinator

In order to assess CSR progress in each establishment, an audit document was prepared based on the various reference materials and models:

- Global Compact
- ISO 26000
- Green Globe via a CSR audit.

6 of the 9 hotels of the Collection were assessed from July to November 2014 internally by each CSR officer concerned:

- Le Bristol Paris
- The Brenner's Park in Baden Baden
- The Hotel du Cap-Eden-Roc in Antibes
- The Château Saint-Martin & Spa in Vence
- Eden Rock Saint Barth's
- The Palais Namaskar in Marrakech.

Regarding the other 3 establishments:

- Fregate Island Private, the results will be taken into account in the analysis of 2015,
- L'Apogée Courchevel, as the establishment only opened in 2013-2014, the CSR measures have not been implemented yet,
- The Lanesborough in London was only recently added to the Collection in November 2014.

The objective for 2015 is to assess the 9 hotels and reach an overall score of 60 %.

Below are the results of the 6 establishments assessed:

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

Analysis

The **Bristol** shows unrivalled results on the social theme with the core subjects “human rights” and “working relations and conditions” obtaining **92.86 % and 91.18 %**.

The **BPH** is also very committed to ensuring good working relations and conditions for its employees with a score of **91.18 %**.

The **PNM** attaches a great deal of importance to local communities and their development with a score of **65.38 %**.

ER stands out with its score of **69.23 %** in fair operating practices.

HDCER and **CSM** obtain high results as the sustainable development approach was implemented and has been monitored since 2010.

Generally speaking, we can see that the **social** theme with the core subjects “human rights” and “working relations and conditions” has the best results in all establishments with averages of respectively **69.64 % and 75 %**.

With a score of **37.50 %**, the **governance** theme has apparently not been embraced by all the establishments. There is also room for improvement for the **environment** with an overall average of **39.58 %**.

Based on these results, the two improvement targets for 2015 are:

- governance
- environment

The overall objective for these two subjects for 2015 is set at 50 %, in other words an increase of more than 10 %

II.1.b. Identity

In the middle of 2014, CSR strategy was extended to the group as a whole with the appointment of an Oetker Collection CSR Coordinator, Miss Julie Poirot, and membership of the Considerate Hoteliers association and Global Compact.

The first action was to create a sustainable development identity through: a vision, a mission, values, a logo, a slogan and a tangible policy which all our employees could rally to.

Our vision

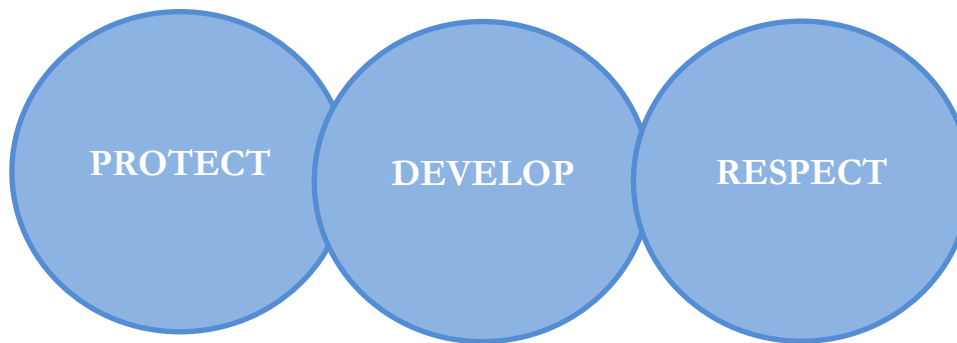
Oetker Collection has chosen to make the most of its know-how, savoir-vivre and social skills to develop and sustain the future of generations to come in the long term.

Our mission

The Oetker Collection family is guided by common values and goals, especially regarding social and environmental development.

It is this new commitment that allows us to be closer to our guests.

Our values



Our slogan

“Patrons for a safe and a guaranteed future”

Our logo



PATRONS FOR A SAFE AND
GUARANTEED FUTURE

II.1.c. CSR policy

Governance objective: Raise the awareness of 90 % of our employees on social responsibility

Commitment 1: Ensure respect for human rights and optimise our working conditions

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

Objective: Reach the score of 4 on the Opinion Survey on the “communication, training and career prospects” questions

Commitment 2: Control our consumption and protect our environment

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

Objective: Measure and compare our water and energy consumption

Commitment 3: Guarantee a service of an exceptional quality and increase the awareness of our guests on social responsibility

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

Objective: Incorporate sustainable purchasing in the purchasing strategy

Commitment 4: Take part in the social, cultural and economic development of the regions in which we operate

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

Objective: Reach the figure of 30 % of local suppliers out of our total number of suppliers

II.1.d. Our hotels' CSR awards

The Palais Namaskar



**La Clef
Verte**

The Palais Namaskar received the Green Key label as a reward for its commitment in favour of maintaining the natural balance of its environment. Since its opening, the Palais Namaskar, which is a genuine destination in itself for its flora and fragrances, has tirelessly promoted and advocated a respect for the environment at all times, in keeping with the precepts of Feng Shui which is at the basis of its architecture. This commitment has been rewarded today with the Green Key label by the Mohammed VI Foundation for the environment.

In this respect, Mr Laurent Branover, the Managing Director of the Palais Namaskar stated:

"We are the first luxury hotel in Morocco to receive this certification as we lay great emphasis on the environment and our objective is to give back to Earth what she has given us. This label is the first key for us and we are going to continue in this way to help make Marrakech an environmentally friendly destination."



The Green Key label is awarded within the framework of the Federation for Environment Education (FEE), which was implemented by the Mohammed VI Foundation for the protection of the environment in 2008. Supported by the United Nations Environment Programme and ILO, 2,100 establishments have received the label today in 41 countries.

Le Bristol and the Brenner's Park Hotel have decided to join the Green Globe programme in 2015.

Hotel du Cap-Eden-Roc and the Château Saint-Martin & Spa



The Oetker Collection environmental approach began in both these hotels in 2010. They have both been certified Green Globe since 2011.

Created in 1992, Green Globe is an international label for sustainable tourism and travel. It rewards and assists hotels

which have opted for an approach to improve the environmental and social management of their activities. The certification audit is annual.



On 17 November 2014, both these hotels obtained the “Innovation Trophy” within the framework of the Alpes-Maritimes Climate Energy Plan. This Plan is a sustainable development approach which is specifically focused on fighting climate change. For its 2nd

edition of the “Climate-Energy Trophies of the 06 department”, the General Council of the Alpes-Maritimes rewarded the most active players in technological and energy innovation.

The Château St-Martin & Spa and the Hotel du Cap-Eden-Roc were awarded the Trip Advisor Eco-Leaders. The Château St-Martin & SPA received the Silver award in the Eco-Leaders category and the Hotel du Cap the Bronze award.

The TripAdvisor Eco-Leaders programme brings together all sorts of eco-friendly hotels and lodgings to suit every budget. All commit to respect the environment and protect nature in particular by recycling, cooking local and organic products and by proposing charging stations for electrical cars.



II. 2. SOCIAL COMMITMENT

Ensure respect for human rights and optimise our working conditions

The Oetker Collection objectives are:

- ❖ *Increase the attractiveness of the Oetker Collection*
- ❖ *Attract, keep and employ the best employees*
- ❖ *Demonstrate the know-how by developing employees' skills*
- ❖ *Favour the motivation, performance and well-being of our employees within the Oetker Collection*

II.2.a. Ensure that each of our employees is treated fairly while fighting against discrimination

At the Hotel du Cap-Eden-Roc, the Château Saint-Martin & Spa and L'Apogée Courchevel, all employees are conversant with the Ethical Charter which is appended to their employment contract. In the social section of the Charter, it lays the emphasis on the following points: ban on moral and sexual harassment, right to the respect of the human dignity, refusal of any form of discrimination (relating to recruitment, to the manner in which they are treated and included in the team, career prospects, training and communication, and equal opportunities). The internal rules set forth provisions concerning harassment and means of prevention exist (for example, the room maids work in tandem).

Various other methods have been implemented: Traceability of recruitment interviews, panels of recruiters (systematic involvement of a member of HR), partnership with Handi'job in the recognition of workers with a disability, integration of trainees and employees who are made available from ESATs [*Establishments and Services that provide Assistance through Work*], preparation each year of a gender comparative analysis, action plan on gender equality at the workplace which was signed on 30 April 2012, action plan in favour of employing elderly employees which was signed on 30 January 2012, and an action plan on generation contracts which is currently being prepared. All the figures below concern the Hotel du Cap-Eden-Roc:



II.2.b. Favour an optimum quality of life and support social dialogue

Quality of life and remuneration

The company's wish is to comply with, and even exceed, the regulatory provisions of the classification grid of the Hotels, Cafés and Restaurants (HCR) national collective agreement and to comply with the average salaries paid in similar, local establishments.

The remuneration policy is based on the statutes, the type of contract and seniority. It includes a fixed monthly salary or based on the turnover of the hotel, benefits which are related to the hotel industry such as food and accommodation advantages, a 13th month of salary, bonuses at the end of the season, bonuses that are linked to quantitative and qualitative objectives, and profit sharing.

To make the life of our employees at work easier, the Hotel du Cap-Eden-Roc has committed to numerous points such as:

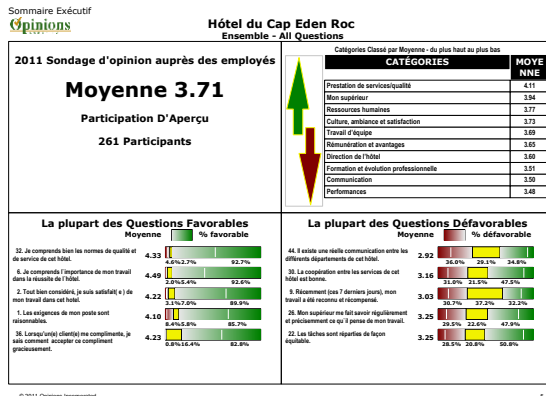
- A major **internal training** plan which is available to all employees who are interested,
- **A company restaurant:** where the cost of a meal is €3.51. This allows employees to have balanced, healthy meals.
- A complementary group plan to cover **medical costs**, $\frac{3}{4}$ of which is paid by the company, a supplementary social protection plan as well as a Company Savings Scheme and a Collective Pension Fund.

Health and safety at work

Particular attention is paid to health and safety.

A unique and very comprehensive risk assessment document has been drawn up and no health or safety problem whatsoever has required a regulatory intervention over the past 12 months. The Communal Safety Commission has always issued favourable opinions.

Social dialogue



An anonymous Opinion Survey on the social climate is filled in each year by the employees so that they can voice their opinions on life in the company. They answer questions on the respect and recognition of their managers and the management of the hotel as far as they are concerned, amongst others. The Opinion Survey is carried out each year.

Results of the 2014 Opinion Survey on questions regarding respect and recognition. (questions 16 and 17): 81 % favourable

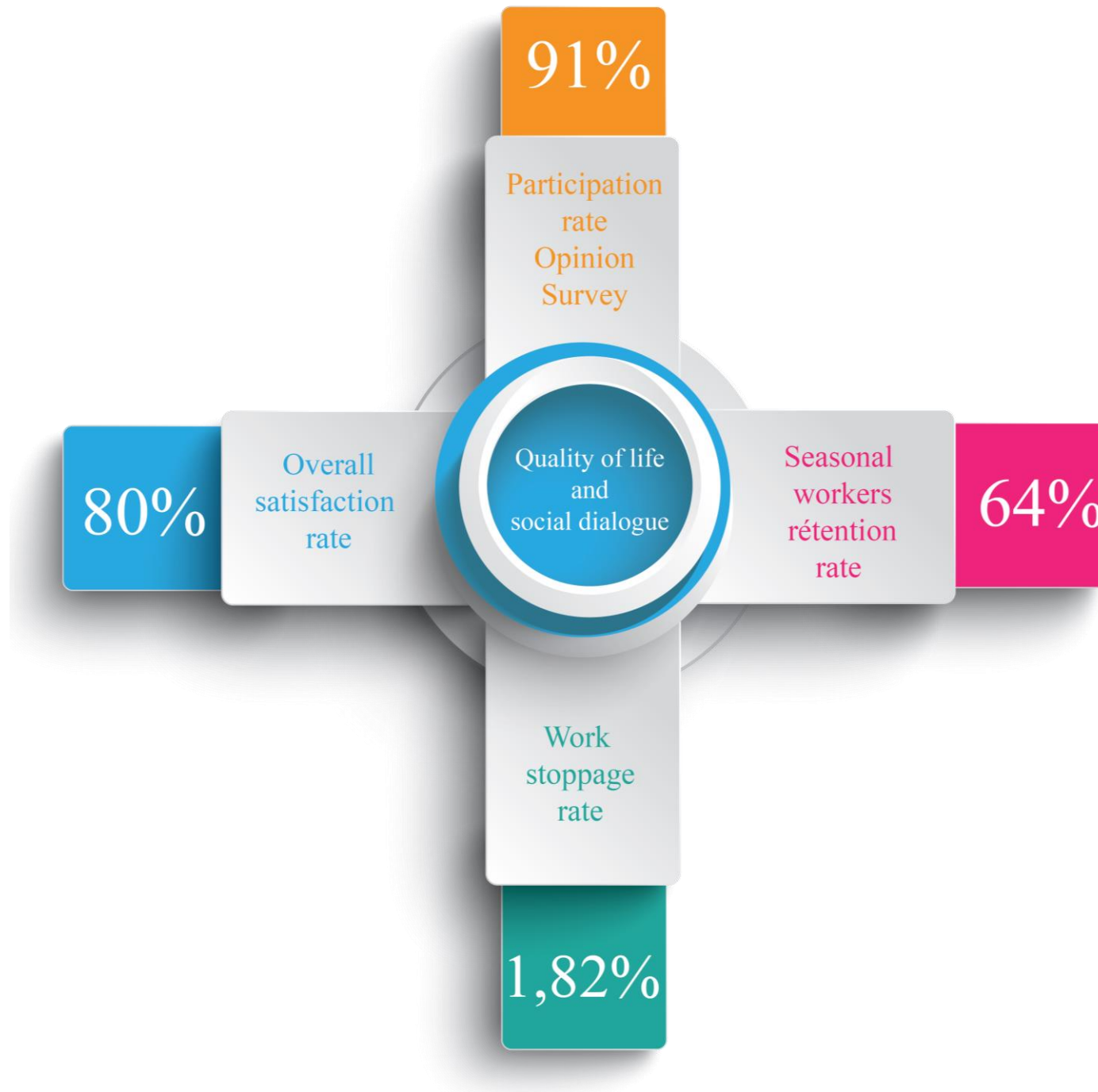
Regular meetings and events with the management and employees are organised each year to optimise social dialogue: forum meetings, expression meetings, induction days, briefings (daily commitments), general meeting (direct line meeting), department meetings, heads of department meetings, staff parties, outings of the Club 100, Christmas lunch, inter-hotel raids and team cohesion. Awards and gifts are given to the staff: employee of the month and year (QASE), long-service award, gifts on the birth of a child, retirement gifts and gifts at Christmas.

Expression meetings are organised to favour social dialogue. These meetings are open to all employees and give them an opportunity to meet the Managing Director and the Human Resources Manager. Lasting for about 2 hours, they allow for upward communication by answering employees' question.

Number of participants at the Hotel du Cap-Eden-Roc in 2014: 10 % of the total workforce



APOGEE Expression meeting



II.2.c. Encourage the development and employability of our employees

In order to comply with the group's objectives, the Human Resources department of the Hotel du Cap-Eden-Roc and of the Château Saint-Martin & Spa launched a Job and Career Provisional Management programme which:

- Allows for individual and group skills to be identified.
- Draws up a map of skills which takes into account the diversity of skills.
- Anticipates the departures of senior employees to favour the transmission of knowledge.
- Develops monitoring and recognition tools of the skills that are required and lacking with the implementation of adapted training plans.
- Carries and shares the vision and values of the company.

- Identifies the human resources required for the needs and projects of the company.

This project is spread over 2 years.

The internal and external training plan is on a par with the needs of the company and those of employees.

Tested assessment processes are implemented: meetings are organised every year and each manager who is required to conduct these meetings must be trained on the assessment tool and how to deal with awkward situations.

Group objective for 2015:

Score of 4 on the Opinion Survey on the "communication, training and career prospects" questions





Hotel Le Bristol's social matters

Following the impetus of its direction and its social partners, the hotel Le Bristol places its colleagues at the core of its strategy. Numerous actions allow our co-workers to benefit from prime social conditions:

Development

- **Team Building:** Several sessions are organized during the year so as to give our teams opportunities to bond in settings differing from the company. These seminars usually revolve around management training and team cohesion.
- **Direct lines:** Four times a year, a meeting takes place, gathering an employee from every department and a member of the C.O. The meeting's goal is to let employees speak freely in order to find collectively achievable guidelines to improvement for each and every department. A solution is proposed during the following meeting.
- **Familiarisation night:** Every employee is invited to spend a night at the hotel Le Bristol once its trial period is validated. This opportunity is given to our colleagues so they can experience what a night at a luxury hotel is all about.
- **Contests & Training:** Deeply fixed in the Le Bristol's culture, know-how's handover is part of the company's DNA. The hotel Le Bristol has among its teams five "meilleurs ouvriers de France"/ France's best workman and many professional contests' laureates (Georges Batiste Cup, Scott Cup...). All the means are applied so as to assist our colleagues in their professional development.
- **Cross training & Management training:** Many training programs are organised to promote professional development. Cross trainings allow employees to get familiar with the services from another department.

Management trainings allow young potentials to develop their knowledge regarding all the services of a specific department during a year.

Rewards

- **Staff party:** Every year, the management committee invites the entire staff as well as their spouse to the staff party. The event takes place outside the hotel and gathers all the teams for dinner and dancing evening.
- **Themed dinner:** the cafeteria's teams organise every month a themed dinner in the lunchroom. Members of the direction serve meals.
- **Profit sharing:** a turnover's section is distributed equally among the hotel Le Bristol's employees.

Communication:

General meetings are organised four times a year. These meetings allow the general management to share the company's economic results and its upcoming strategy. They usually gather around a hundred people and night sessions are organised so employees working at night can attend as well.



COMMITMENT 1

Ensure respect for Human Rights and optimise our working conditions

ACTION CONDUCTED

Implement a Job and Career Provisional Management programme

The Human Resources department has been working on a Job and Career Provisional Management programme in conjunction with an external body since 2013.

ACTION CONDUCTED

Organise expression meetings

The expression meetings allow for a direct exchange between Management and employees.

ACTION CONDUCTED

Proposal for a Solidarity Leave

The Hotel offers its employees the possibility of taking a solidarity leave with the Planète Urgence association.



COMMITMENT 1

Ensure respect for Human Rights and optimise our working conditions

98.41 %

Of salaries paid are above
the contractual minimum levels

80 %

Employees' overall
satisfaction rate

4,546.4

Hours of training in 2013

2015	Our improvement objectives
	<ul style="list-style-type: none">✓ Pursue the implementation of the Job and Career Provisional Management programme✓ Increase the Score to 4 on the Opinion Survey on the “communication, training and career prospects” questions

II. 3. ENVIRONMENTAL COMMITMENT

Control our consumption and protect our environment

Our activity has an impact on the environment through: the consumption of materials, the modification of local ecosystems and the different types of pollution discharged into the biosphere. Our responsibility is first of all to abide by all the progress in regulations and exceed them where possible. Compliance with regulations is monitored with the assistance of external experts:

- an environmental expert company prepared a report on compliance in 2012 and put forward recommendations concerning safety and the ICPE (Installation Classified for the Protection of the Environment) approach,
- a law firm, with expertise in environmental law, draws up a report on the new texts which apply to the establishments each quarter.

II.3.a. Through innovation reduce our consumption of resources

The sustainable use of resources

Energy and water consumption is under control.



The consumption and related costs are available in real time on the account of the Netseenergy remote reading tool. This tool also allows for the load curves to be analysed per day, week, month, year ... and per sector and allows for leaks to be pinpointed.

An energy advisor gives advice on consumption and warns us in particular if there is overconsumption. Below are consumptions for the Hotel du Cap-Eden-Roc:

Consumptions
in **2014**

Compared
to **2010**



2 910 623 kw/h

+ 2%



1 443 203 kw/h

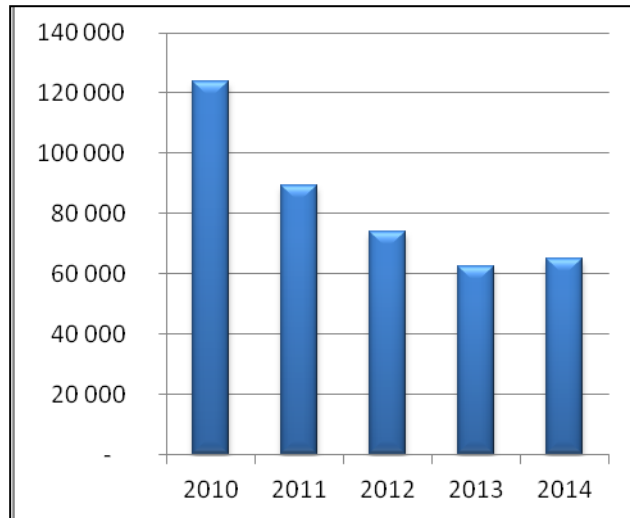
-4,6%



64 979 m³

-27,4%

WATER (m3)



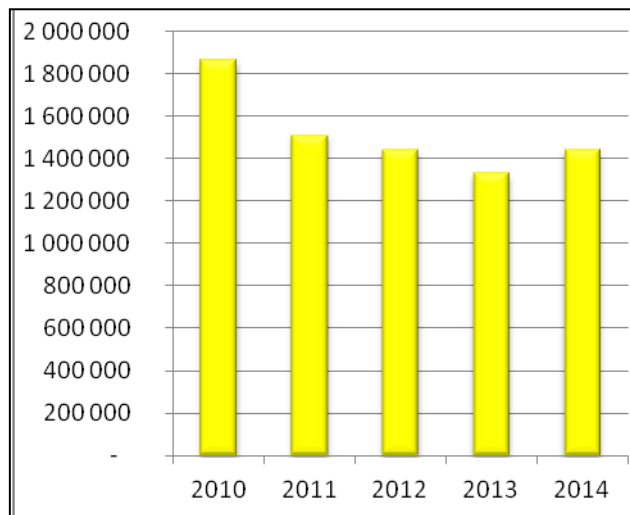
Thanks to this daily monitoring, we can note that we have reduced our water consumption by nearly 30 % between 2011 and 2014. Indeed, we were able to pinpoint various water leaks, repair them and thus save approximately 15,000 m3, in other words €30,000 by repairing them.

We have reduced our water consumption since 2010 by installing:

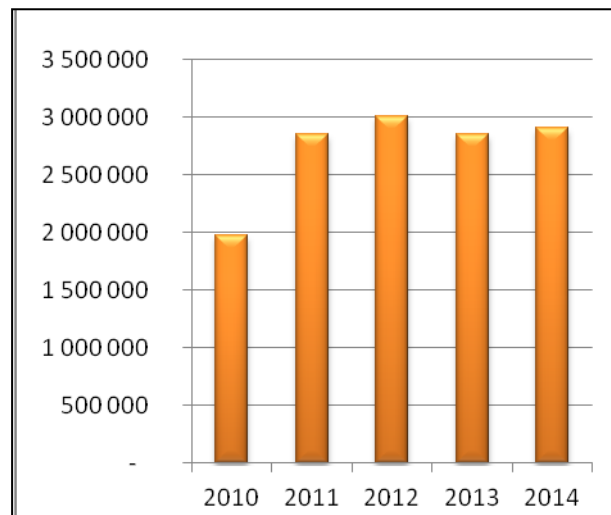
- aerators: 85 taps are equipped with aerators out of 198
- double-flush toilets: 168 double-flush toilets out of 203
- 16 rain gages.

It is planned to change all the watering taps that leak due to wear and tear in 2015.

ELECTRICITY (Kw/h)



GAS (Kw/h)



As far as electricity is concerned, we can see that our consumption increased by 2 % between 2011 and 2014.

This is due to the fact that we completely renovated the hotel over a period of three years and certain installations that used gas were replaced by ones using electricity.

This can clearly be seen in the reduction of gas by nearly 5 %.

The following actions have allowed for our electricity consumption to be reduced since 2010:

- The installation of low energy lamps and LED: 703 LED out of 5,692 lighting points
- The Hotel closure plan during 6 months in the winter (October to April),
- Staff training on summer/winter eco-gestures,
- Our computer equipment is mainly comprised of equipment with the **Energy Star** environmental certification. Energy-intensive equipment is systematically replaced at the end of its life with Energy Star labelled equipment.



We have taken part in the Energy Performance Network programme since 2014. This is a working group comprised of representatives from major companies (the Côte d'Azur Racetrack, Amadeus, Crédit Agricole Paca, Grand Hôtel du Cap Ferrat, Club Med Opio, Institut Arnault Tzanck and Nice matin) on energy savings over 3 years.

This involves attending quarterly meetings which are held on the premises of one of the members on an alternate basis. The first was held on the premises of EDF. In October 2014, it will take place at the Hotel du Cap.



Thanks to this network, an Effective Energy Agreement was validated in order to invest in:

- LED tubes for the car parks to replace the current tubes,
- LED flame bulbs that are tailor made to ensure the aesthetic quality of the shape and colour of the desired bulbs.

We plan to install 52 presence detectors in 2015 in two car parks in order to avoid unnecessary lighting in the day. In addition, 120 50-watt bulbs will be replaced by 6-Watt LED bulbs in the seaside changing rooms. As far as this project is concerned, we expect to see a drop in consumption of **22,800kw, in other words a saving of €3,200 over the 6 months of the season.**

Over the past three years, the 117 rooms in the Hotel have been renovated with strategic choices being made for certain materials so that we are able to better manage our energy. The details are given below:

External structure:

Insulation of the attic space or roofing
Windows and patio-doors with insulating glass
Insulation of the roof terraces and sloped coverings < 5 %

Heating:

Insulation of a hydronic heating network
Insulation of an existing domestic hot water network
Self-setting single-flow controlled mechanical ventilation

Equipment:

Lighting for ceramic metal halide lamp with electronic ballast

TV with LED

LED lighting in the bathrooms

Master on/off switch for lights

Reversible air-conditioning

Water-saving washbasin and toilet aerators which ensure that consumption is halved

Ecological paint with 70 % water acrylic without solvents or petrol

Department:

Training for company managers, employees and building tradesmen on energy savings.

Group Objective for 2015:

Measure and compare our water and energy consumptions



To achieve this, we work with the “Considerate Hoteliers” association and have developed an online tool called Con-Serve which will provide us with a Benchmarking study of our consumptions.

II.3.b. Understand, protect and restore the biodiversity that surrounds us

Protection of the environment and rehabilitation of natural habitats



The Hotel du Cap Eden-Roc property, which is situated on the Cap d'Antibes, covers approximately 8 hectares of land and includes Mediterranean species of trees including one hundred Aleppo pines, forty umbrella pines and thirty-three olive trees. The main alley of the Hotel du Cap leads to the coast, providing a breathtaking view of the Mediterranean Sea and the Lérins Islands. This area is known for its rich biodiversity and is classed as a Natura 2000 zone (site FR9301573 "Bay and Cap d'Antibes, Lérins Islands").

The Hotel du Cap is also located between several marine ZNIEFF (Natural Zone of Ecological Interest for marine Fauna and Flora) sites: Type I ZNIEFF "Golfe Juan and anse du crouton" and "Pointe du crouton", Type II ZNIEFF "from the Cap d'Antibes to the pointe Bacon" and "Golfe Juan and anse du Crouton".

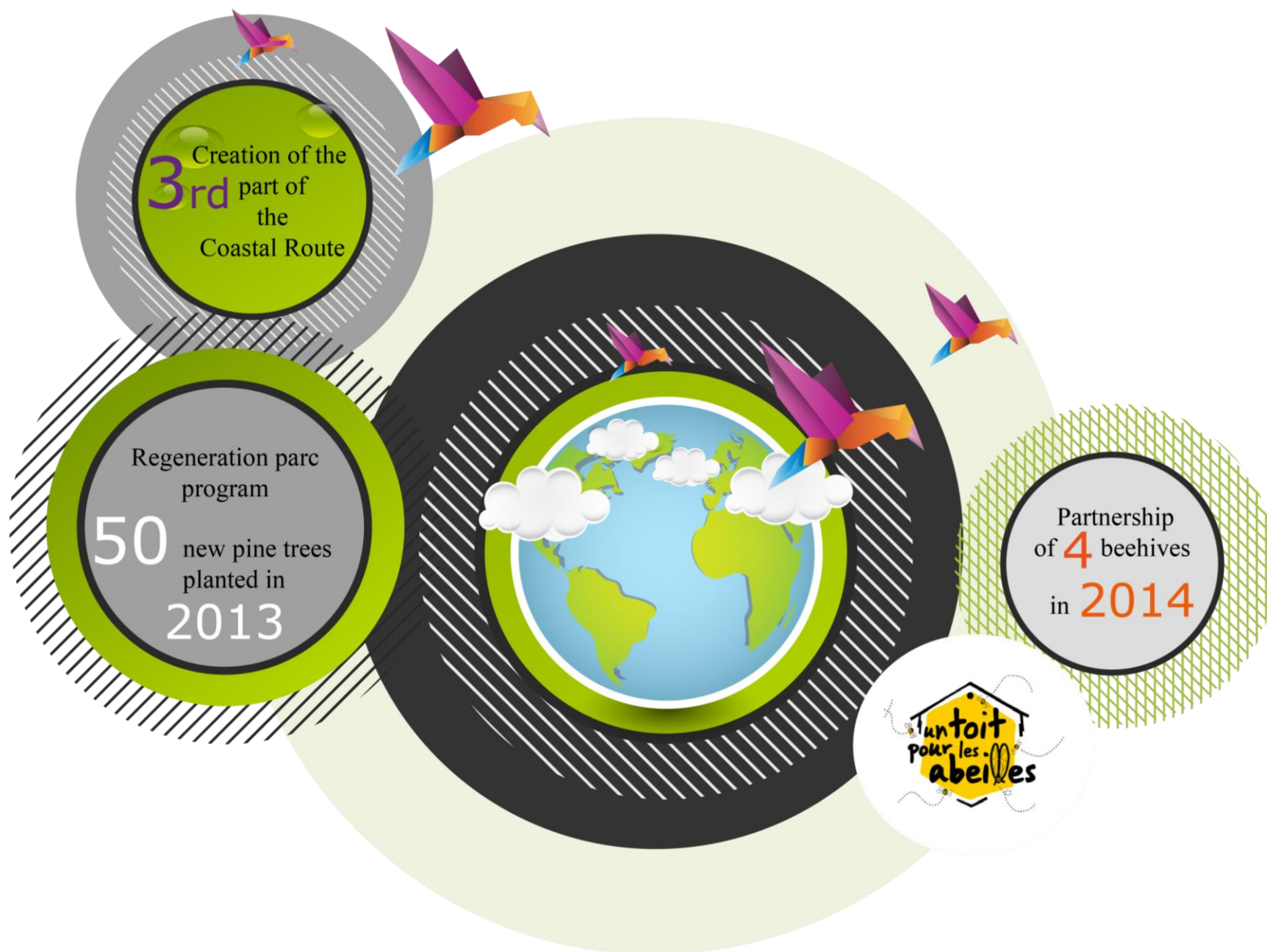
Feedback on the Bird Protection League inventory campaign

The Hotel du Cap-Eden-Roc, situated on a unique site between a natural zone and an urbanised zone, can act as a feeding or reproduction haven for various taxons. This area is also located on a bird migration route and can be used by them as a stop-over site. Species listed on the Natura 2000 site may be found here. However, the well-maintained surrounding gardens limit the long-term installation of biodiversity.

In view of its geographical location in peri-urban settings bordering a Natura 2000 zone, the Hotel du Cap-Eden-Roc presents major challenges. Some appropriate adjustments together with the implementation of management measures would favour nature in this peri-urban backdrop while at the same respecting the Hotel's role to welcome guests and meet their expectations:

- Maintaining islets of wild grass
- Maintaining hedges, trees and shrubs which are favourable to the fauna
- Install nesting boxes and homes
- Fight against invasive vegetation
- Limit plant treatments to a minimum, even biological ones
- Favour the installation of insects (constructed habitats for insects (insect hotels), deadwood and ponds)
- Favour ecological corridors for the passage of mammals (passage through fencing for small fauna, etc.)
- Train the technical agents







This feedback enables us to implement a specific action plan for 2015, such as:

- The purchase and planting of **flower seeds** to create flower islets in our gardens and thus encourage the return of butterflies and birds.
- The installation of an **insect hotel** near the Kid's club to increase the awareness of our guests' children on biodiversity. This installation will be followed by training sessions with naturalists from the Bird Protection League.
- We plan to carry out mulcher mowing tests as a natural fertilizer of our soils and plant shredder tests for the **mulching**
- The installation of **wooden signs** explaining our biodiversity protection actions to our guests and the sustainable management of our gardens.
- The installation of wooden signs explaining our biodiversity protection actions to our guests and the sustainable management of our gardens.

The Hotel du Cap Eden-Roc is situated on a listed site, the natural site of the Cap d'Antibes. The establishment has also been classed as being remarkable in a Natura 2000 zone. The Hotel takes the conservation of the natural heritage very seriously so that your stay is an enchanting sight of protected biodiversity.

Group Objective for 2015:

Develop a support project which is dedicated to biodiversity

The Fregate Island Private Biodiversity protection programme

Fregate Island Private is a natural Eden which is unique in the world: just under the equator, at 35 km from Mahé, the capital of the Seychelles, it is a harmonious combination of nature and shrewd luxury.

Fashioned with fine intelligence, the hotel sits in perfect harmony with its inhabitants: the fauna and flora.

The biodiversity protection programme is an inspiration for all:

- 2,200 giant Aldabra tortoises live in complete freedom on the island.
- The nests of hundreds of endangered tortoises are protected.
- The Seychelles Magpie-Robin was saved from extinction on the island.
- The rehabilitation of indigenous forest with tens of thousands of plants being planted.
- The wealth of more than 100 species of tropical birds.



Giant Aldabra tortoises

The young and old alike are greeted by the giant Aldabra tortoises which roam freely through the deserts of the island.

Although there were only 150 tortoises 25 years ago, the island now boasts more than 2,000 inhabitants. These ancient creatures bear witness to a remarkable conservation effort. The island was gradually restored to its natural state which has enabled these tortoises to develop fully and multiply

to reach their current number. By creating a nursery for the youngest tortoises, we can continue to monitor their development and ensure that they are properly protected.

Sea turtles

The Fregate Island sandy beaches provide a vital nesting habitat for two species of marine turtles: the green turtle and the hawksbill turtle. The Seychelles is one of the rare places on earth where marine turtles come ashore to nest during the day.

During each nesting season from October to January, our conservation staff protects several hundred nests. They ensure that the young turtles hatch successfully and in complete safety.



More than 100 species of tropical birds

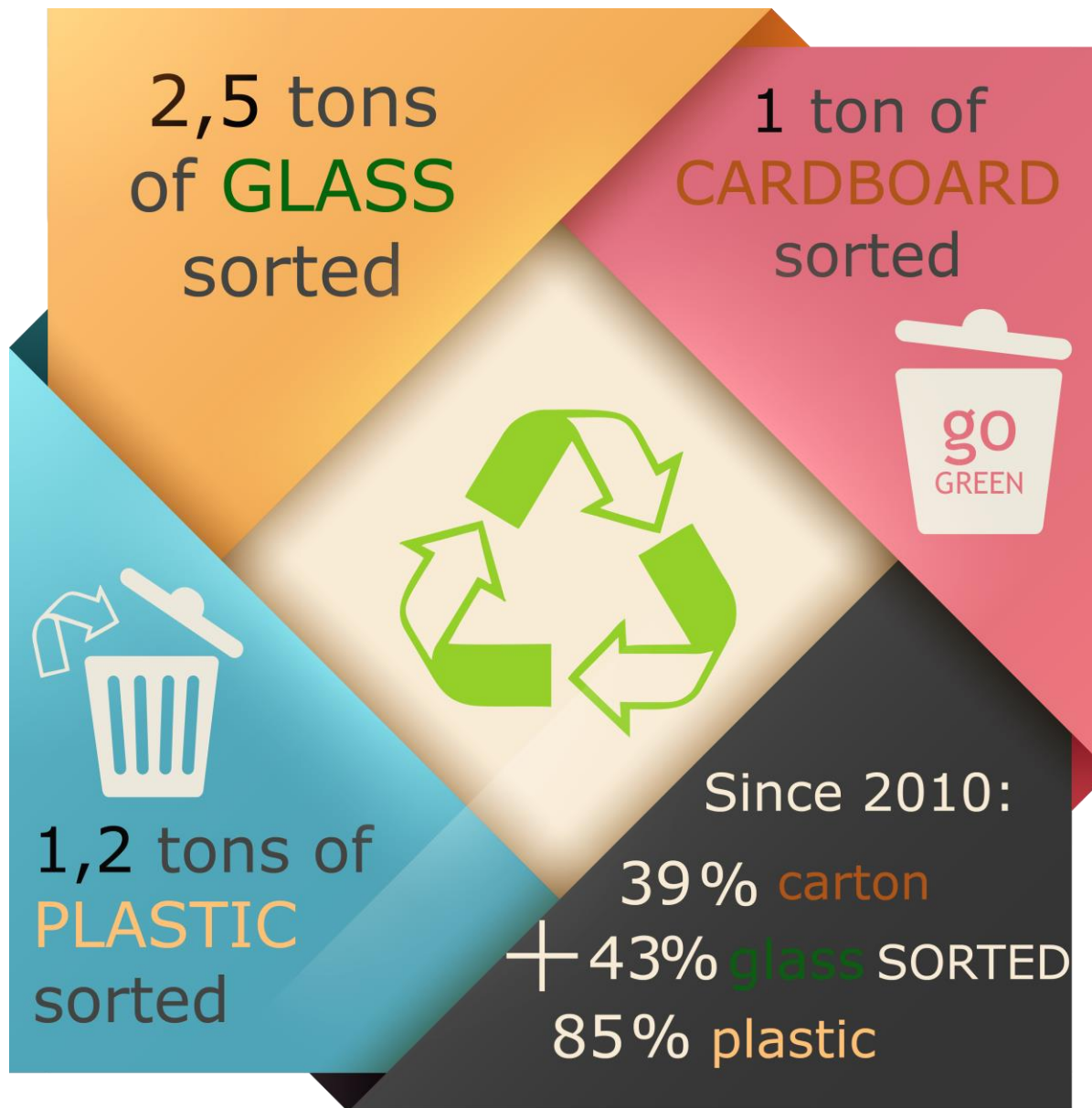
Hundreds of thousands of birds find refuge on the Fregate Island representing a total of more than 100 species, 13 of which live on the Island permanently. Each day, at dawn, it is a real delight to discover these fairy terns and noddies gliding over the Island when they come back from their shipping expeditions. With many possibilities to observe the rare and exotic migrating birds, like the frigate bird, our exquisite avifauna will surprise nature lovers.

The Magpie Robin – A conservation Success Story



Fregate Island was the sole, remaining habitat of the Seychelles Magpie Robin. It was near extinct with only 14 birds left and was the second rarest bird in the world 30 years ago. These charming, charismatic birds have since been rescued and the current population is kept in good health by the work of our permanent conservation staff on the Island. Thanks to a programme which was started in collaboration with Birdlife International, there are now more than 100 of them. Part of this success is due to the enormous effort we put in to protect the Island and the plants from all forms of pesticides, rats and rodents, and ensure that the birds can reproduce in complete safety in the wild. In addition, we are restoring the continuous habitat to its original state – before it was used as a coconut plantation for hundreds of years – by planting countless native trees and shrubs. We have also helped to establish healthy and stable populations on the four Seychelles Islands.

With all these efforts in place, we can proudly say that we have all saved this beautiful species from extinction – it is a genuine success story.



II.3.c. Apply the regulations and strive to limit any type of pollution

Waste

We started sorting at the Hotel du Cap-Eden-Roc in 2010 and our objective was to increase the waste sorted between 2010 and 2015 by 5%. This figure will be significantly higher as between 2010 and 2014 we increased the percentage of the waste sorted by

We collect plastic caps for the association *Les Bouchons d'Amour* and corks for the *France Cancer* association.

We also collect the unused flip-flops and slippers of our guests for the Red Cross.

We also keep sheets of paper that have only been printed on one side so that our printer can make writing pads that are then redistributed in the various departments.

The majority of our bottles are returnable and our local farmers use crates for their deliveries which

they take back on the next delivery.

Mitigation of climate change

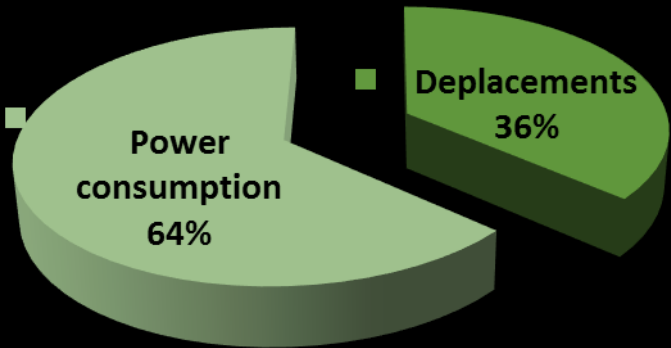
We carry out an Assessment of our Emissions of Greenhouse Gases internally.

Thus, the emissions of GHG for guest transport represent 96 % of the 35,458.39 tonnes of CO2 equivalent of the Hotel du Cap. In order to be as representative as possible of the hotel's activities, we have chosen to record them without guest transport.

Comparison of external an internal GHG emissions



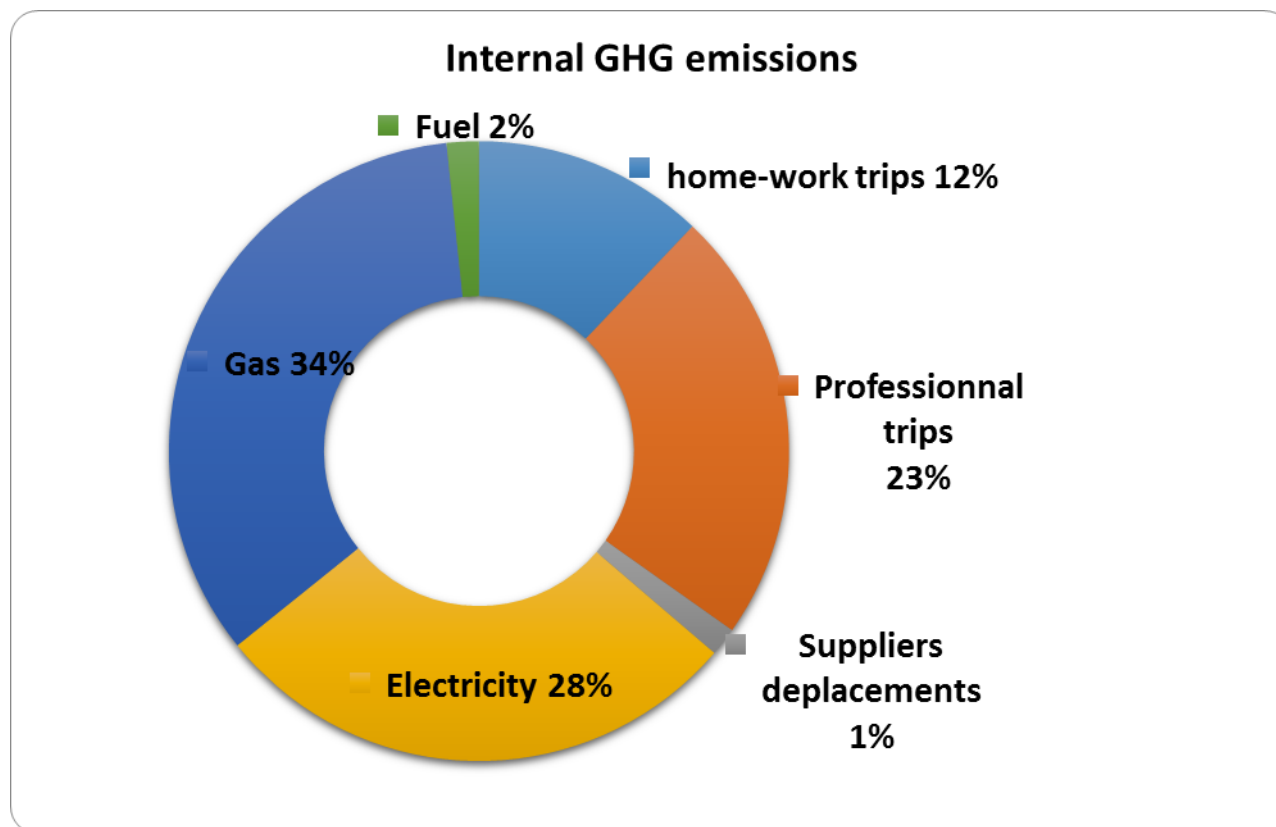
GHG internals emissions



We can see that the highest contributor to greenhouse gas emissions, excluding guest transport, is energy consumption and in particular gas.

We have reduced our CO2 emissions by 31.15 tonnes thanks to electricity and gas savings. In addition, we have not needed to fill up with refrigerants this year as our equipment is more efficient.

Work-related travel increased significantly – more than 134 tonnes in 2013.



Sources of emissions		tCO2 in 2012	tCO2 in 2013	difference	tCO2 in 2014	Difference
Energy consumptions	Electricity	234.18	222.30	-11.89	225.67	3.37
	Gas	294.31	271.51	-22.79	286.44	14.93
	Propane	X	X		X	x
	Butane	X	X		X	x
	Fuel	14.64	13.31	-1.33	13.31	0.00
Sub-total		543.13	507.12	-36.01	525.42	18.30

As our gas and electricity consumptions increased in 2014, our assessment of emissions of greenhouse gases did too: +18.30 tonnes in 2014.



COMMITMENT 2

Control our consumption and protect our environment

ACTION CONDUCTED

Innovate in the energy research

Thanks to our partnership with EDF and the RPE network, we develop ecoefficient equipments adapted to our establishment.

ACTION CONDUCTED

Prepare a management plan of our park

Manage the green areas and the biodiversity to be found in general in our park more sustainably thanks to the Bird Protection League report.

ACTION CONDUCTED

Calculate and compare our GHG emissions

We assess our greenhouse gas emissions internally each year and compare our results.



COMMITMENT 2

Control our consumption and protect our environment

30

Species of birds registered
on the site in 2014.

45,000 m³

Of water saved since 2010

31.5 tonnes

Of CO₂ saved in 2013

2015	Improvement objectives
	<ul style="list-style-type: none">✓ Apply the regulations on bio waste in 2015-2016✓ Manage rainwater by separating out the hydrocarbons✓ Carry out an energy audit in line with the ISO 50001 standard

II. 4. SOCIETAL COMMITMENT

Guarantee a service of an exceptional quality and increase the awareness of our guests on social responsibility

II. 4. a. Guarantee an impeccable service and purchasing policy through fair operating practices

Fight against corruption

We have prepared a **Code of Ethical Business Conduct** for the Hotel du Cap-Eden-Roc, the Château Saint-Martin & Spa and L'Apogée Courchevel which lays down the Oetker Collection's commitments in the field of duty-based ethics. It reflects our historical values as they are expressed in the 7 values of the Oetker Collection and the Ethical Charter of the Hotel du Cap-Eden-Roc, the Château Saint-Martin & Spa and L'Apogée Courchevel.

All our actions must be guided by reliability, confidence and fairness requirements. We should endeavour to meet or exceed the regulatory requirements in force, fulfil our commitments and avoid conflicts of interest. We commit to produce accurate internal information and to

protect the confidentiality and security of this information. We undertake to communicate openly both internally and externally.

The aim of these commitments is not only to ensure that our practices comply with the law and the regulations in force but also to earn and maintain the trust of our guests, our shareholders, our employees, our suppliers and other partners in the long term.

The purchasing department and all buyers are aware of the problem of corruption with regard to suppliers.

The Executive Committee of the three hotels regularly reviews the anti-corruption policies in order to monitor and improve the results.

We prepared a **Responsible Purchasing Policy** in 2011 focusing on the good practices to be implemented. It was updated in 2014:

- A joint commitment with our suppliers
- Ensure that the programming of orders is relevant
- Implement reasonable payment deadlines that comply with the LME (French Act on the Modernisation of the Economy)
- Avoid unfair practices and clauses
- Promote local sourcing (And limit pollution)
- Integrate environmental and social criteria
- Fight against discrimination and respect employees

The goal of this policy is to guide our employees in their purchasing procedures. It is comprised of clearly defined objectives. This policy will be reviewed in the near future and, where applicable, will be adjusted to take into account the recommendations of the NF X50-135 standard on responsible purchasing that has been published by the Afnor and the work in progress of the ISO to prepare an international standard on responsible purchasing.

We have consequently modified certain purchases since this Charter was drawn up in 2011, such as:

- the printer paper comes from recycled materials,
- the fitted carpet is ecological,
- the maintenance products bear an ecolabel,
- the shower gels in the rooms are organic and respect the health and the environment ...

Promotion of social responsibility in the value chain

Our sustainable development approach is part of a partnership with our suppliers which respects people and the environment. As a consequence, we have asked them to sign a sustainable and responsible purchasing charter which focuses on the following major issues:

- A joint commitment,
- Eco-friendly purchases,
- Limiting pollution,
- Favouring the social aspect.

We have sent a letter to all our suppliers on a different issue each year since 2010, asking them to indicate their actions internally and their email address:

- 2010: Announcement of the environmental programme and proposal to reduce waste by reducing packaging ...
- 2011: The charter was sent and suppliers were asked to return it signed.
- 2012: Announcement of the Green Globe certification and suppliers were asked to indicate their Sustainable Development actions.
- 2013: The results of our Greenhouse Gas Emissions Assessment were sent to the suppliers and they were asked to indicate their actions in this area and whether they were interested in recovering organic waste.

In 2013 and 2014, we targeted our major suppliers in terms of turnover and asked them to validate the charter. We classed purchases according to their type in order to determine the percentage of actual sustainable purchases compared with all purchases. The results are given below:

Responsible purchasing



Quality

The Oetker Collection has a total quality management system (TQM) which is implemented in all hotels.

The TQM/Encore takes into consideration all the hotel's activities in terms of guests and employee orientation and is not only present in our minds but reflected in our everyday work. The TQM/Encore is not a model but an ongoing desire to improve ourselves.

The key principles of the TQM/Encore philosophy are:

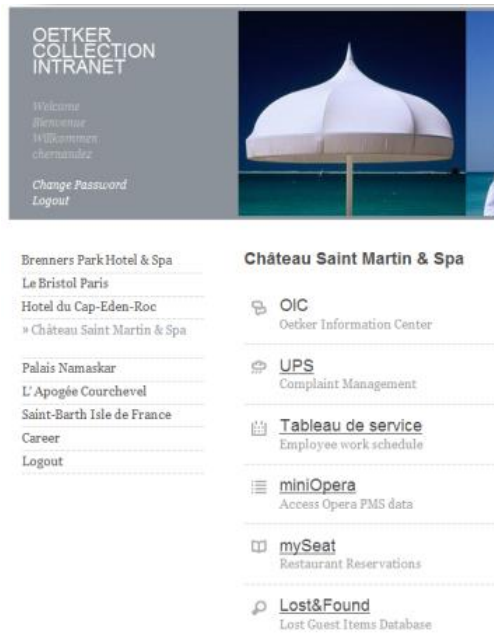
Quality is based on the guests

Quality is obtained by the employees of all departments at all levels

Quality is not a goal but an endless process

Quality does not only refer to products but to services too

Quality requires dynamic behaviour and must be worked on constantly



UPS (Unsolved Problems & Solutions) is an Intranet tool which deals with our guests' complaints. The goal of this application is to produce and maintain a simple and effective system which traces complaints and solves them in the best way and as quickly as possible.

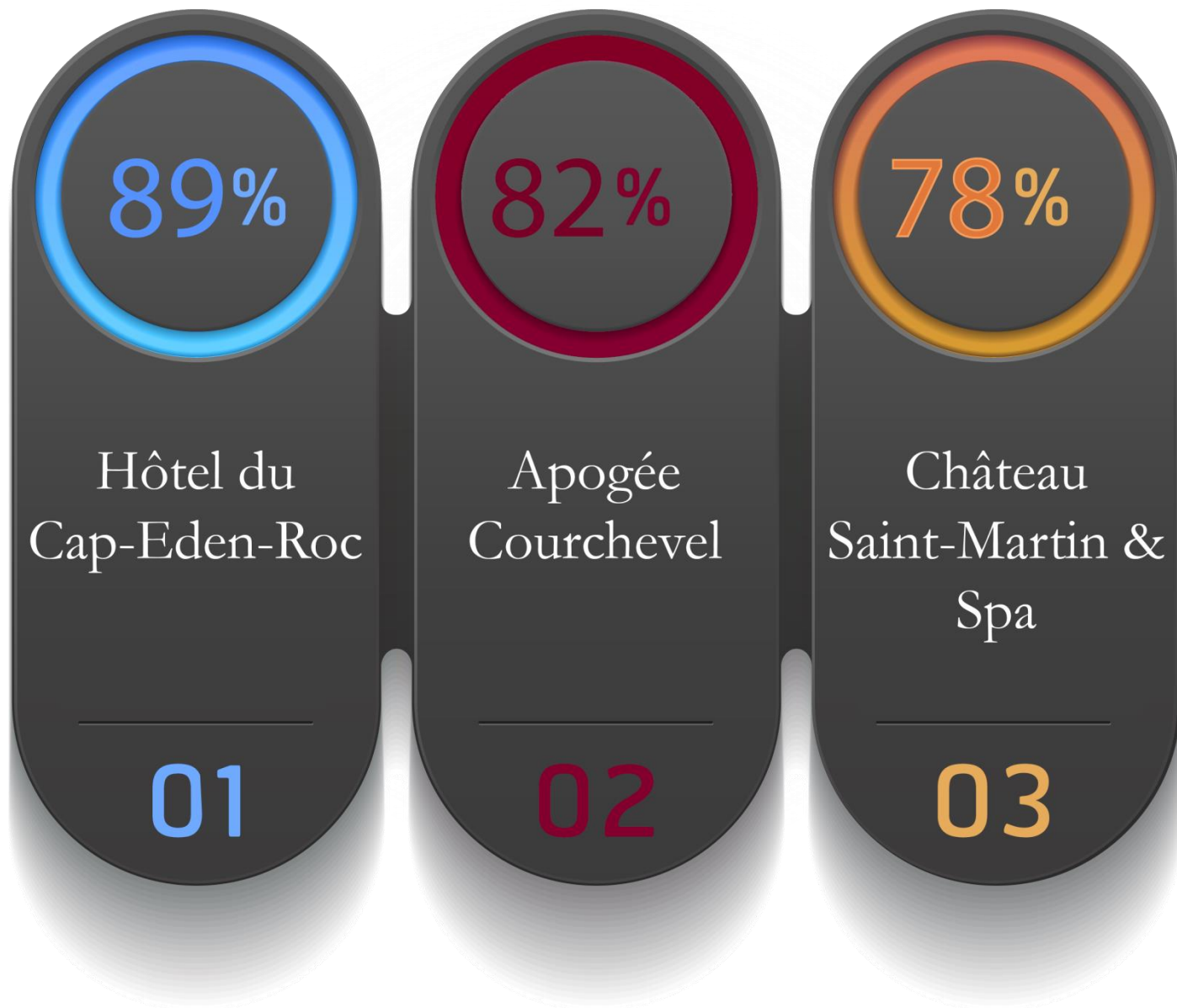
Quality is a top priority in our hotels. As a consequence, a quality system exists called Leading Quality Assurance (LQA). LQA is specialised in carrying out quality assurance checks, comparative analyses and training departments in the luxury hotel sector, thereby allowing guests to monitor and improve their operational performance.

This has resulted in three audits by a mysterious guest, internal tests and action plans with each head of department are monitored throughout the season to ensure compliance.

2014 Results 2014 - Château Saint-Martin & Spa: 91.4 %

2014 Results – Hotel du Cap-Eden-Roc: 91.4 %

2014 Objective of 92 % for each Hotel



In addition, each guest is given a **satisfaction questionnaire** the day before they leave including three questions which allow the hotel to prepare internal satisfaction statistics each month.

Results of the guest satisfaction surveys on 3 points: HOSPITALITY - CARE - REQUESTS.

We are looking to ascertain the percentage of guests who think that we go beyond their expectations and to achieve this, a questionnaire is given to each guest the day before they leave.

2015 Objective of 90 %

Consumers' health and safety

We have taken out insurance policies and have instruments to protect our guests while they stay in our hotels.

As far as food hygiene is concerned, our kitchen department has adopted the HACCP system which is a food safety control programme.

As a consequence, laboratory tests on preparations are carried out once a month to avoid any risk. Kitchen inspection visits by external bodies are also carried out each month. The temperatures of the freezers and refrigerators are monitored several times a day and recorded.

As required in the regulations, we carry out tests on the water of our network for legionellosis so that there is no contamination whatsoever.

All our equipment has maintenance contracts and is managed by external companies.

We provide our guests with exemplary confidentiality to protect their privacy and any information that might concern them. To achieve this, we have implemented an anti-spam policy, each employment contract contains a confidentiality clause and each computer is protected by its user's own code.

Group Objective for 2015:

Preparation of 3 joint documents: a responsible purchasing policy, a responsible purchasing charter and a code of ethical business conduct

II. 4. b. Encourage our guests to contribute to our vision of a sustainable future

Education and awareness raising

Guests are informed about our responsibility policy through various media:



- *Written*

When guests arrive in their room, they are given a card called the “Jewels of our Heritage” which informs them of the visits available in the region and, overleaf, a map of our hotel with the possibility of enjoying a guided tour on the botanical, cultural and historical aspects of the hotel and anecdotes.

A double page on our environmental policy is available in the Room Directory of each room.

Press releases giving information on new CSR developments are drawn up and distributed to our press agencies and journalists to be widely disseminated in the press.

Every year, our marketing team informs the sale representative offices in the world of our KSP: Key Selling Points. This is a list of strengths that the Hotel has to underline in order to market itself better. The list includes the words 'Certified Green Globe since 2013'. We are proud of this certification and ask our sales representatives to draw attention to this in their respective markets.

- *Web*

In the booking confirmation emails there is a reference to the fact that the transport used by our guests has an impact on greenhouse gases and we provide a link to a website to offset these emissions.

Our certifications appear after our email signatures: Green Globe and Tripadvisor Eco-Leader.

The Green Globe certification and the Eco-leaders logo can be seen in the welcoming text on the home page of our hotels' websites.

The Facebook accounts of our hotels publish news on sustainable development once a month and a Facebook account on the CSR department of the 3 hotels has just been created.

Hotel du Cap-Eden-Roc: CSR Statistical Survey - Facebook 2014						
Date	Title	Likes	Comments	Sharings	Persons Reached	Comments
03.06.14	Thursday 5 June: World Environment Day	93	2	2	3,340	Acceptable number of likes. See how to present the information differently in 2015 to increase these results.
05.06.14	World Environment Day	227	5	14	4,946	Popular publication, possibly due to the photographs of dishes which are often popular
02.07.14	Humanitarian action in Togo	69	4	1	5,206	Not a lot of likes, the followers are not interested in this type of subject which has no direct link with the hotel: present the commitment in direct link with the Hotel (HIV)
03.07.14	Hotel du Cap-Eden-Roc certified Green Globe 2014!	71	1	2	2,60	Acceptable commitment compared with the results that we usually have with this type of publication.

- *Television*

A film on sustainable development including interviews of our staff is available on guests' television sets. It presents our specific actions in favour of CSR.



- *Oral*

When preparing the invoice, we inform our guests that the Hotel du Cap-Eden-Roc donates €1 per room in favour of a marine environment association: the Aquanautes. Our guests are then given the possibility of making a donation to protect biodiversity.

Building on this partnership with the association les Aquanautes, we have organised guided tours of the *Espace du Littoral et de la Mer* (Coastal and Sea Centre) which is just next to the Kid's Club at the Hotel. This has raised the awareness of our guests' children on the importance of protecting the Mediterranean.

- *Events and experiences*



In 2014, we organised an Environment Day with an organic menu for our guests. As it was not an all-round success, we shall not be repeating it in 2015.

Guests are transported in electric vehicles around the establishment.

Honey from our sponsorship of an association *Un toit pour les abeilles* (A roof for bees) is available during the breakfast buffet.

Projects for 2015

Meet all the players of “The Jewels of our Heritage” card to create a new film for the TV which builds on its heritage value: including the cultural know-how of the region, the local farmers, the Aquanautes ...

Install wooden signs explaining our actions to protect biodiversity and the sustainable management of our gardens to our guests.

Install an insect hotel in our Kid’s club to raise the awareness of our guests’ children on biodiversity. This installation will be followed by training sessions conducted by naturalists from the Bird Protection League.

Adopt a communication along the lines "Adopt a sustainable lifestyle" which emphasises virtuous behaviour with regard to our policy and offers a 'green' group package with transport in electrical vehicles, organic wine, organic menus, etc.

Suggest including an information section on the website on how 'to spend 3 perfect days on the Côte d'Azur' with suggested routes and activities in the region.

Put this reviewed COP in rooms.

The cultural programme of Eden Rock St Barth's

Raising the awareness of guests

The motto of the Eden Rock-St Barth's is to believe that being a beautiful hotel is not enough to meet the expectations of current high-end guests. As a consequence, three creative areas are addressed in our establishment to make our guests' experience unforgettable: art, music and gastronomy.



Recording studio

Eden Rock - St Barth's is the ideal setting to escape, relax and compose. The establishment offers guests the possibility of recording a soundtrack as a souvenir of their stay at St Barth's.

Thanks to the partnership between Eden Rock – St Barth's and OceanWayRecording Studios of Hollywood, CA, guests can record their own music in a professional studio which is fully equipped with a large selection of musical instruments, sound equipment and microphones. The legendary Neve sound mixer to be found in the recording studio

is the one that was used by John Lennon to record the famous Imagine song.

Art Gallery

The Eden Rock Gallery is situated on the summit of the iconic Rock of the hotel. Each year, the Eden Rock – St Barth's offers a complete programme of exhibitions from mid-October to the end of August. The Eden Rock Gallery organises international partnerships with Art Saint Barth or even prestigious galleries such as Gagozian or Perrotin and offers exclusive exhibitions featuring a blend of artistic styles and forms. Previous collaborations include renowned artists such as Piotr Urklanski, Jean-Charles de Castelbajac, Richard Prince and Will Cotton. This season the works of the young American Kaws or even the director Hamony Korine are presented. Exhibitions of local artists' works are presented throughout the hotel.



Painting lessons

Eden Rock offers painting lessons for the young and old alike. It is the resident artists on the island who give the lessons on: oil painting, watercolours, drawing or sculptures ...



ENGAGEMENT 3

Guarantee a service of an exceptional quality and increase the awareness of our guests on social responsibility

ACTION CONDUCTED

Provide information on our CSR policy

Make the CSR report available in the rooms

ACTION CONDUCTED

Adopt a comprehensive reference guide on business ethics

We have reviewed and completed our reference guide to ensure that it complies with current best standards and with the rules laid down by the Oetker Group.



ENGAGEMENT 3

Guarantee a service of an exceptional quality and raise the awareness of our guests on social responsibility

More than **92%**

LQA

Less than **5**

Complaints that were not dealt with

18

Suppliers which have signed the sustainable charter representing

30 % of our
expenditure

2015

Improvement
objectives

- ✓ Increase the percentage of sustainable purchasing
- ✓ Know the CSR expectations of our guests
- ✓ Prepare a sustainable experience proposal

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

II.4.c. Favour local producers who are guarantee of the rich heritage of our region

Favouring local producers highlights the cultural identity of our hotels through two aspects:

- Quality
- Regional presence
- Reduction of GHGs

Indeed, the quality offered to our guests also depends on the products chosen. By respecting the seasonal timeliness and locality of the products, we ensure a guarantee of quality.

Working in close collaboration with local players enables us to boost the local economy by enhancing the identity of the region in which the hotel operates. By emphasising this identity aspect, the experience we

offer to our guests is unique – a culinary experience that is far removed from globalisation.

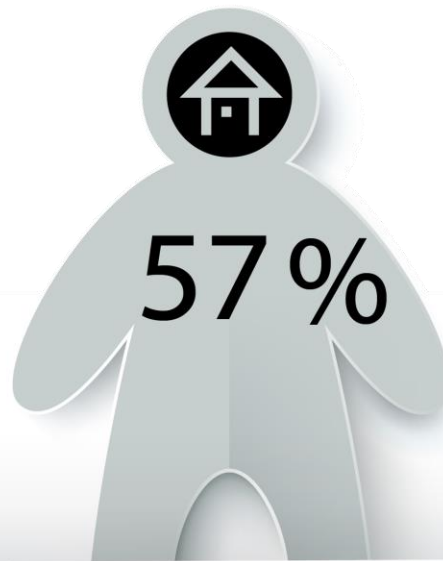
To conclude, by choosing close partners, goods are not transported over long distances thereby reducing the ecological footprint with fewer emissions of greenhouse gases.

As a consequence, we monitor the location of the suppliers with which we work.

2013 - Suppliers distribution



FRANCE



with LOCAL



WORLD

The Hotel du Cap-Eden-Roc has prepared a book entitled “The Craftsmen of Paradise” with interviews of its faithful employees and exceptional partners.

Here are some excerpts about local suppliers:



Vineyards of the Abbey of Lérins

If there is one remarkable wine on the wine list of the Hotel du Cap-Eden-Roc it is the wine produced by the monks of the Abbey of Lérins. This small island situated at less than one kilometre from the tip of the Croisette in Cannes offers a breathtaking view from Monaco to Saint Tropez. We can understand why a fortified monastery was built there to protect the monks from the Saracens in 1050.

An anecdote: in the guestbook of the Abbey, there is an evocation written by Paul Claudel dated 10 April 1936. He wrote, “Lérins is like a short prayer, in the middle of the eternity that surrounds it on every side”.

What you like the most about your work: our ethical concept of the work and product to be prepared has guided and boosted our commitment to quality and fair trade. The satisfaction of a job well

done in all its aspects ensures that we obtain a top-quality product with the consumer in mind.

The most difficult: the question we ask ourselves is this one: how do we introduce our monastic production in the market economy? The latter is at first sight not at all compatible with the values that underpin the lives we devote to God. How should we react to the competition which is very often aggressive from consumer society and the exploitation of a monk's image in a shocking manner by advertising? At the Abbey of Lérins, we have chosen to answer these questions by respect and openness to what we are, and to the value of our products.

Work clothes: alb and blue apron

The most magical moment or feeling that a customer has enabled you to experience: undoubtedly the simple pleasure of an anonymous buyer. [...]

Your motto: Peace and joy¹

¹ "The Craftsmen of Paradise", Preface by Philippe Perle, Texts by François Simon, Photographs by Jean-Michel Sordello, March 2009, Assouline Publishers, P. 112



Aimé Pellegrin's vegetables



For the past fifteen years, this market gardener from Grasse has got up at dawn to deliver the vegetables covered in morning dew to the Hotel du Cap-Eden-Roc. He lovingly watches over them from the corner of his eye, takes care of their appearance, helps them to develop and picks them at the right time.

An anecdote: (it is also my pride...) I was discovered in another restaurant. When the Chef of the Hotel du Cap-Eden-Roc tasted my asparagus by chance, he immediately contacted us to deliver some to him ...

What you like the most about your work: watching the vegetables grow.

The most difficult: undoubtedly knowing how to handle the produce and manage parasitic insects without disturbing the healthy life of the vegetables.

The indispensable tool: there isn't only one! You need a great deal of equipment and a lot of hard work to grow our vegetables.

Working clothes: shorts, t-shirt and bare feet in the summer!

The most magical moment or feeling that a customer has enabled you to experience: without a doubt knowing that American cinema stars eat my asparagus!

A gift you would like to offer: a basket of vegetables that have just been picked for my friends.

Your motto: Work as hard as possible to have good produce²»



² “The Craftsmen of Paradise”, Preface by Philippe Perle, Texts by François Simon, Photographs by Jean-Michel Sordello, March 2009, Assouline Publishers, P. 130

II.4.d. Commit alongside our partners in sustainable projects that are linked to the values we defend

When the furniture was changed between 2010 and 2013, we give our old pieces and bedding to **humanitarian associations** such as **“L’Association La Serre”**.

At the end of each year, the Management of the Hotel du Cap makes a financial donation to several local associations such as: the Red Cross, the League against Cancer, the Williams Music association, the Retirement Home of Antibes, the Corporation of Sailors of Antibes, the Union of Fishermen of Antibes ...

Each year, our teams organise a **collection** of toys and clothes for a Red Cross home.

We collect plastic caps for the association *Les Bouchons d’Amour* and corks for the **France Cancer** association.

We also collect the **unused flip-flops and slippers** of our guests for the **Red Cross and Secours Populaire**.



We welcomed the **Red Cross charity gala in June 2014** and we donated a gift for their tombola.



In December 2014, our Pastry Chef prepared **Yule logs** and chocolate bards for the **Red Cross Christmas Day** at the Retirement Home of the Coteaux d'Antibes. The goal of this event was the mixture of generations with children from the Red Cross and elderly people who lived in the retirement home. The Head Chef and the sustainable development coordinator contributed to the event by providing the logs and chocolate bars and by serving them.

In September 2014, we organised a **blood collection** for the second year running in favour of the French Blood Service (EFS). 42 blood bags were collected and more importantly 40 of the 56 people were new donors!

We have entered into a partnership with the association **Planète Urgence**, which is a Recognised Public Interest association. Its goal is to support and foster self-sufficiency among the populations, and protect the environment by sharing knowledge, training or technical support in favour of project leaders around the world. Our **Human Resources Manager** volunteered to take a **solidarity leave in Madagascar** in **February 2013**. She returned in 2014 for a mission in Togo.



On 29 September 2014, the Hotel du Cap-Eden-Roc took part in the **Cote d'Azur Inter-Hotel Raid** with the association Team Nature.

Attached to the human nature of this initiative, the organisers also give priority to ecological aspects. **Car pooling, recycled products and raising the awareness of the participants on environmental protection** marked the mindset of this day. In addition, to an annual contribution made by Team Nature to the GoodPlanet Foundation which was founded and chaired by Yann Arthus-Bertrand, a reforestation action with the National Forestry Office, which was also a partner of this Raid, is planned as follows: one team registered = one tree planted.



The Hotel du Cap-Eden-Roc contributed financially to the construction of a portion of the **Coastal Route** with the local authorities.

The coastal pathway, known by the name of Tire-Poil, allows walkers to stroll along the cape in good weather from the car park of the Garoupe beach to the Villa Eilenroc. As it runs right up close to the waves, this 2.7 km-long itinerary passes through steep rocks and along the imposing boundary walls of the Garoupe and Croë Chateaux.

It offers an exceptional panorama: to the west over the Lérins Islands and to the east on the first peaks of the Mercantour.



PALAIS NAMASKAR MARRAKECH

The Palais Namaskar and its CSR team work in close collaboration with the BIN AL OUIDANE commune and its schools.

Indeed, following a meeting with the Headmaster of the 3 schools in the community next to the Palais Namaskar, the decision was made to provide all schools with the necessary football kit. This meant



The solidarity programme of the Palais Namaskar

that each school was able to form its own football team and organise football tournaments. The CSR Team of the Palais Namaskar bought 3 sets of football kit for a team of 15 pupils. The kit was distributed during a visit to the three schools.

In addition, open day visits of the hotel were organised with a meal at the Namaskar Restaurant for the pupils of the 3 BIN ALOUIDANE schools.

The Palais Namaskar and its team also renovated one of these three schools: the SAADNA School.

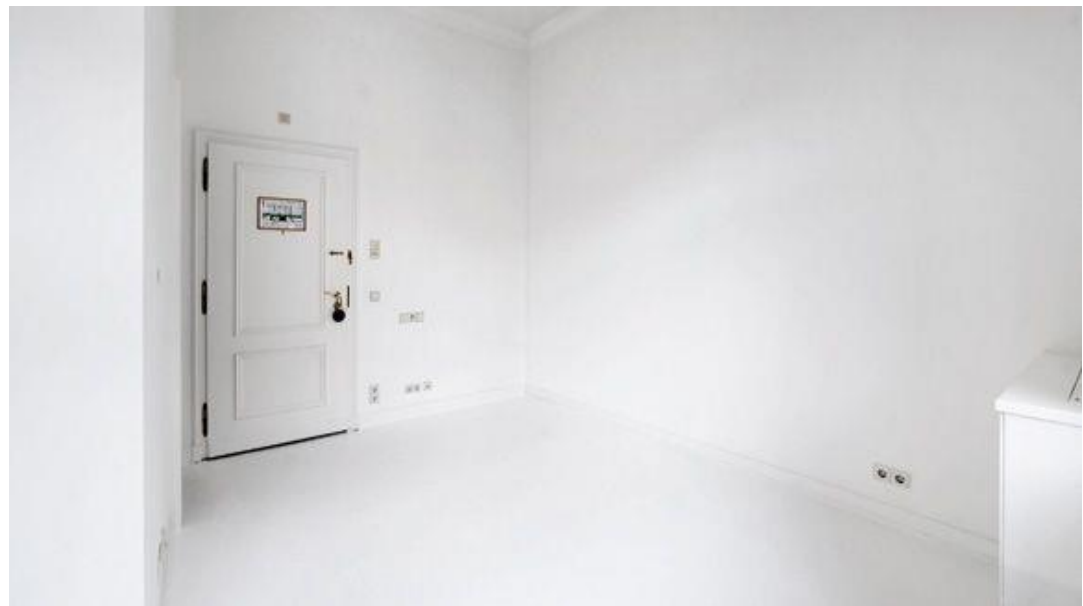
- Plumbing work
- Renovation work on the girls and boys toilets teacher's accommodation, installation of urinals and 3 washbasins
- Electricity work
- Renovation of the general electric board and the electric boards in the classrooms
- Lighting, bell on the main door and sockets added in the classrooms
- Joinery work
- Barrels, handles, and locks on the classroom doors, cylinders and windows changed
- Construction work
- Wire fencing, railings and wall
- The paintwork was redone throughout the school and in the teachers' accommodation
- Rework the land around the school with pedestrian paths and granite
- Masonry and finishing work
- Gardening work
- Gardening work throughout the school

The education and culture program at Brenners Park Hotel & Spa

Artist in residence

Behind its dignified façades, Baden-Baden is constantly developing and reinventing itself. In 2004, an innovative project, namely the Brenners Artist in Residence, saw the coming together of the Staatliche Kunsthalle art gallery and Brenners Park-Hotel & Spa. Every year, the two institutions award a highly prestigious working scholarship to a member of the younger generation of international artists.

The underlying aim of the project is to promote open-mindedness and the exchange of knowledge and ideas. This corresponds to both the world-class hotel as well as the art gallery with its internationalities. New and challenging ways of encountering the town, its culture, history and, most importantly, its people are being opened to internationally significant artists by the two neighbours in the Lichtentaler Allee.



This is room # 127, which the guests upon arrival were able to decorate with furniture and art, which they could choose from a 'furniture menu'



In 2014, the artist in residence was Christian Jankowski, who was inviting guests to room #127 in Brenners, which he did transform during this time into a small decision-making space. His aim was to trigger his guests into making two kinds of decisions: the first focuses on the material decisions concerning the interior design with the guest's involvement being that of selecting furniture and items for the room. The second is all about taking the chance to make a personal decision—and that decision is whether or not to spend the night in the small room. The greater, more genuine and more urgent this decision is, the greater the enjoyment of the art.

These are 2 examples of the results of 2 different guests. All guests could leave a comment what the decision was, they came up to during the night they spent in their individual room. Also they were asked to mention how much the stay was worth for them. This amount was donated to the artist.

Cooking Kids

Healthiness is the result of the right nourishment in an intact environment – this principle is well-known to most parents, though they do experience how difficult it is to guide children and teenagers to a healthy and even-handedly delicious nourishment in the daily routine.

Resulting, Jürgen Mägder, a passionate chef launched the 'European cooking kids'. Frank Marrenbach liked the concept and Brenners Park-Hotel & Spa founded the chapter in Baden-Baden. The concept currently is designed for 24 kids, aging between 10 and 12 years, who will get a playful insight into the world of culinary arts, table manners, protection of the environment and health protection.

The kids will meet 20 times in 11 different gastronomic venues over the two years. There the kids will learn theory and practical tasks in kitchen and service and learn about preparation of produce in the butchery and bakery.

After a successful working day the children will sit and eat the food they cooked at the tables they set up and will take care of the service as well. Besides the culinary lessons, they will visit wineries, farmers, participate in the plum harvest in Bühl, etc.

At the end of the two year project, there will be a test at the Chamber of commerce, which is a certificate for an operational training seminar.



Some of the cooking kids during preparation of the final ceremony.



Frank Marrenbach (on the right)
with the winner in 2011.

The Alfred Brenner Foundation (Since 2011)

The Alfred Brenner Foundation (Alfred-Brenner-Stiftung) honours the memory of the great hotelier Alfred Brenner, who gave his name to the renowned grand hotel in the Lichtentaler Allee in Baden-Baden. Created in the belief that a hotel of international standing bears a responsibility to its industry and to society in general, the foundation aims to support young talent in Germany's high-end restaurant and hotel business.

The candidates, who are eligible to apply for the Alfred Brenner Scholarship are young catering staff, e.g. chefs, restaurant and hotel managers, under 29 years of age who have achieved one of the top two marks in their vocational qualification or have been commended by the Chamber of Commerce. Its top award of € 3,000 is tied to some form of further vocational studies and will be granted, once evidence has been provided, within 24 months.

Year of apprenticeship / Stories of a Grand Hotel

A quadrinomial TV series about apprentices in the first year of work. This piece was very successful in German TV and resulted in numerous applications for employment for Brenners Park-Hotel & Spa.

In conjunction with the stately TV station SWR a series was created where the audience could steal a glance behind the scenery of Brenners Park-Hotel & Spa in Baden-Baden.

The focus is on three apprentices during their first year of apprenticeship. It is a painful and troublesome but at the same time an exciting path of growing up in one of the most exclusive Spa hotels in the world.

The three apprentices will learn to serve guests in the restaurants, setup beds and clean in housekeeping and work in the laundry and the wine cellar deep down in the bowels of the 142- year old hotel. And they will meet impressive people, as such as international stars of show business, politics, economy and sports.

But most important for them are the people who are training them and who are part of the hotel for years, some already over decades. The main focus of the series was how the three could handle the long and irregular working hours, the lack of leisure time and the separation from family and friends. All aspects were shown, from long days, short nights to euphoria and joy to moments of great exhaustion and sadness to draw a realistic picture of the hospitality industry.

Participation on job fares

The HR department is frequently joining nation-wide job fares, where companies are able to present themselves and candidates have a direct line to apprentices and HR staff likewise.

Selection of German Luxury Hotels

The selection of German Luxury Hotels, founded in 1987, is a marketing cooperation of the nine traditional luxury hotels in Germany. Since the beginning it was the goal to work close to generate mutual business and create synergies between the hotels. This does include the promotion of staff as well. Each hotel will send several selected apprentices, who have proven to be part of the elite at their respective hotels to other properties of the Selection to train them and deepen their knowledge in a special department, e.g. fine dining restaurant or housekeeping and to give them the opportunity to open their horizon. This project has been very successful as many of these candidates have gone on a prospering journey within the Selection and often built a great career.

Cooperation with schools and universities

Since many years Brenners Park-Hotel & Spa is working closely with several national and international schools and universities. Hans Peter Veit, our Spa Manager is a permanent guest lecturer at the Eurocampus, a university with the focus on sport, event and tourism management, where students can graduate in bachelor and master degrees. Mr. Veit is focusing on imparting profound knowledge about the wellness market and wellness concepts. Furthermore he is an expert on nutrition science and nutrition prevention. Students will learn to integrate healthy nutritional and lifestyle habits in the customers' daily schedule.

Besides this dedication we cooperate with the Hotelschool in The Hague and the IUBH university in Bad Honnef, where we recruit new employees and sponsor students, who have previously worked already at Brenners Park-Hotel & Spa. Another cooperation we do have since many years is with “the Lycée des Métiers de L'Hôtellerie” and “Tourisme Alexandre Dumas” in Illkirch, Alsace. Students will work in all of our outlets for several weeks gaining knowledge and getting an insight in the culinary division, housekeeping and service.

The Oetker Collection solidarity commitment

Pursuant to commitment 4 of our Social Responsibility approach, we have undertaken to take part in a humanitarian project in Togo, alongside the JMAH (Young Humanitarian Aid Missionaries) association, which is related to the value we defend.



Within the framework of a solidarity leave, the Human Resources Manager of the Hotel du Cap-Eden-Roc, Château Saint-Martin & Spa and L'Apogée Courchevel made a most amazing encounter.

Valérie Monnier went on solidarity leave in partnership with the French association, Planète Urgences, to Togo in 2014 where she met Eli Apodo, Director of the Young Humanitarian Aid Missionaries association.



The goal of this association is to help persons suffering from HIV to have access to complete health check-ups.

During her mission, Valérie witnessed the importance of the health role played by the JMAH within her community. She was also able to see that due to a lack of means, the beneficial action of the association was limited.

As a consequence, when she returned to France and as a representative of the JMAH association in France, she suggested that Oetker Collection should create a partnership in collaboration with Eli Apodo, the Director of the association. A donation of €5,000 was thus granted to the JMAH association to set up a community-based pharmacy for AIDS victims.

The link with the Oetker Collection was established by the investment of one of its establishments, the Hotel du Cap-Eden-Roc which hosts the prestigious AmFar (American Foundation for AIDS Research) event each year. This is one of the most important American foundations in the world in financing prevention and medical research against AIDS. Founded in 1985 by the actress Elizabeth Taylor and having the researchers Mathilde Krim and Michael Gottlieb as its founding presidents, it supports and finances more than 2,000 research teams worldwide with more than 360 million dollars of aid over the past 25 years.

Consequently, working for such a project is linked to the values we defend.

BACKGROUND



Several factors were at the origin of the need to set up a community-based pharmacy:

- The extent of the lack of health infrastructure resources,
- The poverty of the population,
- The lack of health insurance cover for all in the country,
- The cost of pharmaceutical products.

VISION

Allow persons suffering from HIV to have access to care and medication.

THE PROJECT

On 5 November 2014, the association started the preparatory work by an information meeting with all the members of the association's professional team. After this meeting, the decision was made to set the pharmacy up on secure premises in order to prohibit access to all unauthorised persons. In addition, a list

of pharmaceutical products was validated by the medical team as well as a list of various suppliers, with a quality/price ratio study. The decision was also made to create a booth to control the flow of patients and issue the medication in complete confidentiality. To achieve this, masonry and joinery work was carried out.

On 26 November 2014, the first order of medication was delivered and installed in the pharmacy. The medication was classed in alphabetical order.

An inauguration and official opening ceremony was organised on 9 December by the persons suffering from HIV with the Director of the association, Mr Eli APEDO. He began by explaining the vision pursued by JMAH and the OETKER COLLECTION group with the community-based pharmacy to the patients. This was repeated on 11 December with another group to ensure a wide dissemination of this event. It is interesting to note that the pharmacy is open to all in order to allow the impoverished population to benefit from this project as well.

The pharmacy thus opened its doors on 10 December 2014. Training on stock management will be organised but we are still discussing about the person (the pharmacy manager) to be recruited and the recruitment method. In the meanwhile, the association has provided the pharmacy with a new computer and all the medication is computerized in an ACCESS database under the supervision of the Director of the association.



4

COMMITMENT4

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

ACTION CONDUCTED

Favour local suppliers and products

Favouring local producers and their products means favouring the local economy and creating a social network, as well as enhancing our region.

ACTION CONDUCTED

Renew our partnerships

The hotel continues to get involved in various projects which are linked to its region and concern the protection of the biodiversity, and social and cultural aspects.

4

COMMITMENT4

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

96%

Of French suppliers

57% of which are

local suppliers

€5,000

Paid each year to the JMAH
association in Togo

1100 kilos

Of fabric recovered and
donated to humanitarian
associations

2015

Improvement objectives

- ✓ Reduce the percentage of our international partners
- ✓ Undertake a genuine sports, cultural and humanitarian sponsorship
- ✓ Highlight our local partners on our guests' television channel

CORRELATION TABLE: GLOBAL COMPACT, ISO 26000 and OC commitments 2015-2016 OC ACTION PLAN													
Global Compact	ISO 26000 core subject	Oetker Collection CSR commitment	Oetker Collection CSR principles	ISO 26000 ISSUES	GLOBAL OBJECTIVES	GLOBAL ACTIONS	REFERENCE DOCUMENT	PERSON IN CHARGE	STATUS	DEADLINE	DEPARTMENT (S) CONCERNED	PARTNERS	MONITORING
Main elements section of the COP	GOVERNANCE	GOVERNANCE	GOVERNANCE	Strategic approach and objectives	Creation of CSR identity	Search for commitments, principles, objectives, logo and slogan in line with OC basic values		J. Poirot	In progress	March-15	CSR	Considerate Hoteliers, Zoo	
				Steering, implementation and control	Score of 60 % on CSR audits	1 st audit in July 2014	2014 CSR Audit	J. Poirot	Finalised	Dec-14	CSR		2014 audit results
						2 nd in September 2015		J. Poirot	Not started	Dec-15	CSR		2015 audit results
				Performance control	Sending of the COP Global Compact annually	COP Global Compact	2015 COP Global Compact	J. Poirot	In progress	March-15	CSR	CSR France	Validation of Global Compact April 2015
				Relations with stakeholders	90 % of employees are made aware of CSR	Preparation of a CSR booklet		J. Poirot	In progress	April-2015	CSR/MARKETING	ZOO	
						Preparation of an OC Global Ethical Charter	OC Ethical Charter	J. Poirot	Not started	April-15	CSR/HR		
						Training on eco-gestures/CSR issues	Eco-gestures	Officer		2015	CSR/HR		Number of employees trained (quarterly)
						Insertion of CSR questions in Opinion Survey: "I have been informed and I understand the CSR approach", "I have been asked to take part in CSR actions by my Head of Department", "I comply with the eco-gestures of my department"		J. Poirot	In progress	Feb-15	CSR/HR	Opinions	Annual results of the 2015 Opinion Survey
						Inclusion of the CSR section in each induction seminar	PPT Presentation	Officer		2015	CSR/HR		Number of employees trained
						CSR TEAM: Voluntary team from the administrative and operational department with a meeting each month. Company grants ½ day to work on CSR.	CSR Team Procedure	Officer		Feb-15	CSR		Follow up of the minutes of the meeting and preparation of a CSR joint project
						Each CSR Team is placed in competition with each other with a reward at the end of the year: stay in the Hotels		J. Poirot	Not started	Jan-16	CSR		
						Monthly election of the CSR QASE along the same lines as the QASE	CSR QASE Procedure, list of nominees, diplomas	CSR Officer		Feb-15	CSR		Green QASE elected

<p>1. Companies are invited to promote and respect the protection of international law on Human Rights in their sphere of influence; and</p> <p>2. Ensure that their own companies are not complicit of human rights abuses.</p> <p>3. Companies are invited to respect the freedom of association and recognise the right to collective bargaining;</p> <p>4. The elimination of all forms of forced or compulsory labour;</p> <p>5. The effective abolition of child labour; and</p> <p>6. The elimination of discrimination in respect of employment and occupation.</p>	HUMAN RIGHTS – WORKING CONDITIONS AND RELATIONS	1. 1. Ensure respect for human rights and optimise our working conditions	Intro/base	Fundamental rights and employment law										
				Working conditions and social protection										
			1.1. We ensure that each of our employees is treated fairly while fighting against discrimination.	Discrimination and vulnerable groups										
				Fair operating practices										
			1.2. We favour an optimum quality of life at work and support social dialogue.	Social dialogue	Score of 4 on the "communication" opinion survey	Score of 4 on the question: "Our Hotel encourages open communication at all levels"		CSR Officer		Dec-15	CSR/HR	Opinions	2015 Opinion survey annual results	
				Health and safety at work										
			1.3. We encourage the development and employability of our employees.	Development of human capital	Score of 4 on the "training and career prospects" opinion survey	Score of 4 on the 4 questions: "I am satisfied with the training received for my current position", "I was able to acquire new skills last year"; "new employees receive the training they require to do their job properly"; "the hotel offers career prospects to employees" .		CSR Officer		Dec-15	HR	Opinions	2015 Opinion survey annual results	
<p>7. Companies are invited to apply a precautionary approach when faced with problems concerning the environment;</p> <p>8. Undertake initiatives which aim to promote a greater environmental responsibility; and</p> <p>9. Favour updating and distributing eco-friendly technologies.</p>	ENVIRONMENT	2. 2. Control our consumption and protect our environment	Regulations	Regulations										
			2.1. Through innovation we reduce our consumption of resources.	Sustainable use of resources	Measure and compare our consumption	Implementation of the Con-serve tool for water and energy (carbon)	J. Poirot	In progress	April-15	CSR/TECHNICAL	Considerate Hoteliers	Monthly follow-up on the Con-Serve platform + annual report		
						Reduction by 5 % in water and energy consumption	CSR Officer		Dec-16	CSR/TECHNICAL	Considerate Hoteliers	Implementation of actions to reduce as early as January 2016 Monthly follow-up on the Con-Serve platform + annual report		
			2.2. We understand, protect and restore the biodiversity that surrounds us.	Protection of the environment and biodiversity and rehabilitation of natural habitats	Become involved in protecting biodiversity	1 biodiversity project per hotel. Have a biodiversity survey carried out by an external company where relevant	CSR Officer		July-15	CSR		Follow-up of the project implemented (quarterly basis)		
						An overall project for all hotels		J. Poirot	Not started	Dec-15	CSR			

			2.3. We apply the regulations on waste and we strive to limit any type of pollution.	Prevention of pollution	Use of eco-labelled products	Carry out tests on eco-labelled maintenance products to replace the most dangerous products	Eco-labels list	CSR Officer		Jan-16	CSR/PURCHASING		
				Waste	50 % of waste sorted (by Dec 2016)	Implementation of sorting and follow-up by each CSR Officer		CSR Officer		Dec-15	CSR/TECHNICAL		Monitoring of monthly tonnage
						Implementation of the Con-serve tool for waste		J. Poirot	Not started	Jan-16	CSR/TECHNICAL	Considerate Hoteliers	Monthly follow-up on the Con-Serve platform + annual report
						50 % of waste sorted		CSR Officer		Dec-16	CSR/TECHNICAL	Considerate Hoteliers	Implementation of actions to reduce as early as January 2016 + Monthly follow-up on the Con-Serve platform + annual report
				Mitigating climate change and adaptation									
10. Companies are invited to take action against all forms of corruption, including extortion and bribes.	FAIR OPERATING PRACTICES	3. Guarantee a service of an exceptional quality and increase the awareness of our guests on social responsibility	3.1. We guarantee an impeccable service and purchasing policy through fair operating practices.	Fight against corruption	Incorporate sustainable purchasing in the purchasing strategy	Preparation of 3 joint documents: Responsible Purchasing Charter and Policy, and Code of Ethical Business Conduct		J. Poirot	In progress	April-15	PURCHASING		Product monitoring per supplier type
				Promotion of social responsibility in the value chain									
				Respect for ownership rights									
				Promote sustainable consumption	10 % of sustainable purchases	Reach 10 % of sustainable purchases out of all purchases		CSR Officer		Dec-16	PURCHASING		Product monitoring per supplier typology
	GUESTS		3.2. We encourage our guests to contribute to our vision of a sustainable future.	Education and awareness raising	Collect guests' comments on CSR	Guest Comments Questionnaire: add CSR question		J. Poirot	In progress	March-15	CSR/QUALITY	ZOO	NB guest comments and processing of replies
/	COMMUNITIES AND LOCAL DEVELOPMENT	4. Take part in the social, cultural and economic development of the regions in which we are operate	4.1. We favour local producers who are a guarantee of the rich heritage of our region.	Creation of wealth and income	30 % of local suppliers	Responsible Purchasing Charter and Policy adopted by each established and monitored by each CSR Officer	Responsible Purchasing Policy and Responsible Purchasing Charter	CSR Officer		April-15	PURCHASING		
				Creation of wealth and income	An overall project for all hotels	Community-based pharmacy in the TOGO with the JMAH association	Presentation of the JMAH project	J. Poirot	Finalised	Dec-14	CSR	JMAH	JMAH quarterly report
			4.2. We commit alongside our partners in sustainable projects that are related to the values we defend.	Education and culture	Become involved in a humanitarian or cultural project	Join forces with a local body in a humanitarian or cultural project which is on a par with the hotel's activities and its location		CSR Officer		Aug-15	CSR Officers		Monitoring of the partnerships undertaken (quarterly)
				Employment creation and skills									

OETKER COLLECTION 2014 CORPORATE SOCIAL RESPONSIBILITY REPORT: COMPLIANCE WITH THE GLOBAL COMPACT FRAMEWORK NOTICE OF CREDIBILITY AND TRUTHFULNESS

For the attention of Executive Management

Further to the request we received and in our capacity as the Independent Third-Party Body (ITPB) of OETKER COLLECTION, you will find below our findings on the credibility and truthfulness of the 2014 Corporate Social Responsibility (CSR) Report of OETKER COLLECTION as well as the implementation of the Global Compact guidelines in the preparation of this Report which is a Communication on Progress (COP) as defined by the Global Compact.

OETKER COLLECTION Responsibility

It is the responsibility of the Executive Management of OETKER COLLECTION to report on its CSR commitment by presenting all the relevant information concerning the profile of its organisation, its CSR policy, its managerial approach and its performance indicators.

Independence and quality management system

Our independence as a third-party auditing body of CRS reports is laid down by French regulatory texts, by our ethical charter and by the provisions stipulated in the ISO 17020 international standard. RSE France is accredited by the Cofrac under the n°3-1051 (the scope is available at www.cofrac.fr) to conduct audits on CSR information which has been prepared pursuant to the provisions of article L. 225-102-1 of the French Commercial Code. As a consequence, we have implemented a quality management system which includes documented policies and procedures that aim to ensure compliance with our ethical rules, French legal and regulatory texts that apply to audits of CSR reports and the ISO 17020 standard.

Responsibility of the Independent Third-Party Body

Based on our work, we are required:

- to certify that the information required by the Global Compact is present in the 2014 CSR Report or is explained in the case of a partial presentation or if information has been omitted and, where applicable, that a commitment is given to present the said information within a reasonable deadline;
- to express an opinion on the fact that the information presented and the overall selection of the content of the 2014 CSR Report give an accurate and balanced account of the performance of OETKER COLLECTION with regard to social responsibility.
- to verify the processes for collecting and compiling the qualitative and quantitative information and to carry out, where applicable, detailed tests to verify the accuracy of the statements made and the quantified indicators.

Procedures implemented

We assessed the appropriateness of the 2014 CSR Report with regard to its relevance, completeness, neutrality, clarity and reliability. We took account of the opinions expressed in the diagnostics that we prepared in 2013 in reference to the ISO 26000 standard. This diagnostics enabled us, on the one hand, to pinpoint the relevant action areas for OETKER COLLECTION when exercising its social responsibility and, on the other, with regard to each of these areas, to highlight the strengths of the CSR commitment of OETKER COLLECTION as well as the risk areas in which the commitment needed to be strengthened. The scope of the diagnostics concerned two of the five hotels which were at that time members of OETKER COLLECTION (there are nine hotels today): the Hotel du Cap Eden Roc and the Château Saint-Martin. We carried out 20 individual meetings with the key managers in both establishments and 2 collective meetings with the staff members of the Hotel du Cap Eden Roc and the staff representatives of the Château Saint Martin.

We verified that OETKER COLLECTION has set up a process for collecting, compiling, processing and controlling the information to ensure the completeness and consistency of the information with regard to the GRI framework. As far as the consolidating entity is concerned, we held meetings with the persons in charge of CSR reporting in order to ensure, based on random sampling and document analysis, that the methodological rules were applied specifying the expected content of the report, the scopes, the periods and methodologies of the quantitative indicators and the reporting media used.

We selected the information that we felt was the most significant in terms of impact in view of the activities and establishments of OETKER COLLECTION. This information is linked to the problems concerning the workforce, remuneration, recruitments/dismissals, health/safety, training, disabilities, energy consumption, waste, GHG emissions, sustainable purchasing, biodiversity and customer satisfaction. For the indicators we deemed to be the most important⁽¹⁾, we carried out sample detailed tests. As the scope included three establishments - the Hotel du Cap Eden Roc, the Château Saint-Martin and l'Apogée - the coverage rate of the consolidated value of the quantified indicators, based on workforce, represented approximately 27%. As a consequence, our opinion is accompanied by a limited assurance. A greater assurance would have required additional procedures. We did not find any material anomaly which might call into question the accuracy and truthfulness of the information contained in the 2014 CSR Report of OETKER COLLECTION.

Without challenging our findings given above, we draw your attention to the need to implement the following measures before the next financial year:

- measures to formalise, harmonise and use the information collection and consolidation procedures at all OETKER COLLECTION establishments,
- measures to make use of the internal monitoring systems to verify that these procedures have been properly understood and are applied.

We would like to emphasise that, due to the restrictions that are inherent to auditing, as well as those that are inherent to the implementation of any associated internal monitoring and reporting system, the risk that a material misstatement has not been detected cannot be avoided. For the same reasons, we cannot give assurance that all the major deficiencies in the reporting system have been identified.

Analysis of the COP (Communication on Progress) of OETKER COLLECTION with regard to the Global Compact guidelines

OETKER COLLECTION joined the Global Compact in 2014. We compared the information presented in the 2014 CSR Report with those required for conformity with the Global Compact Advanced framework. The findings of our work are presented below.

Preliminary questions

Does the COP contain, if relevant, a description of policies and practices related to your company's operations in high-risk and/or conflict-affected areas?

No

How is the accuracy and completeness of information in the COP assessed by a credible third-party?

The 2014 Report was verified by RSE France which has extensive experience in the field of CSR Report assessment with regard to the major international reference materials. RSE France is accredited in France by the Cofrac under the n°3-1051 (the scope is available at www.cofrac.fr) to carry out regulatory audits of non-financial reports pursuant to the provisions of article L. 225-102-1 of the French Commercial Code.

Does the COP incorporate high standards of transparency and disclosure?

The COP (see the profile of the report section I 5) was prepared in line with version 4 of the GRI recommendations (option "essential criteria") without necessarily seeking to obtain total conformity. It provides information on the profile and operational context of the company.

Implement the 10 principles in the strategies and operations

The COP describes mainstreaming in the strategic functions and business units

The COP indicates that the CSR/SD was further developed in 2014 based, in particular, on a diagnostics which was carried out at the end of 2013 in 2 establishments measuring the company's commitment with regard to the core issues and relevant actions of ISO 26000. This diagnostics highlighted the cross-functional nature of the CSR policy and the need to involve the managers and all the persons in charge of operations. The COP states that each Hotel has appointed a CSR officer who liaises with the CSR manager of OETKER COLLECTION. The COP also refers to the involvement of the teams of each Hotel in a Sustainable Development project. The "CSR Teams", which are committees comprised of voluntary members who are sensitive to this issue, have been created for this purpose.

The COP describes the implementation in the value chain

The COP clearly shows the importance of the value chain in the strategy and managerial practices of OETKER COLLECTION. Two of the four objectives of the 2015 CSR policy are devoted to this. The policies and expectations of suppliers and the other professional partners are defined in a reference document which describes the procedures to be followed regarding sustainable purchasing that have been sent to the suppliers and professional partners. A significant percentage of expenses are allocated to suppliers which have signed the sustainable and responsible purchasing charter. The desire to favour local producers is particularly prevalent and its performance is monitored.

The COP describes precise commitments, strategies or policies concerning Human Rights

The COP includes compliance with international standards of behaviour that are promoted by legitimate international institutions (UN, ILO, OECD ...) in a universal call for ethics and integrity. Respect for human rights, in conjunction with the optimisation of working conditions, is one of the four core issues of the CSR commitment of OETKER COLLECTION. An ethical charter, which is given to all employees (it is appended to the employment contract) emphasises, in particular, the right to respect and human dignity and the refusal of any form of discrimination.

The COP describes the management systems in place to incorporate Human Rights principles

The COP describes the systems in place to implement the Human Rights policy, and in particular a grievance mechanism. The ethical charter increases the awareness of all employees on this issue.

The COP describes the monitoring and assessment mechanisms in place to incorporate human rights principles

The COP provides indicators which monitor and assess the effectiveness of Human Rights policies.

The COP lays down precise commitments, strategies or policies in the area of employment standards

The COP includes compliance with international standards of behaviour that are promoted by legitimate international institutions (UN, ILO, OECD ...) in a universal call for ethics and integrity. The optimisation of working conditions, in conjunction with respect for human rights, is one of the four core issues of the CSR commitment of OETKER COLLECTION.

The COP describes the management systems in place to incorporate labour principles

The COP refers to several mechanisms in place concerning the remuneration policy, corporate catering, social protection, health and safety at work, the annual assessment interview, the provisional management of skills, training and social dialogue. These mechanisms are the vital tools used to implement international standards of behaviour at the workplace.

The COP describes the monitoring and assessment mechanisms in place to incorporate labour standard principles

The COP provides indicators which monitor and assess performance in the area of quality of life at work for each of the mechanisms in place and more generally speaking in terms of the assessment by the staff via the results of the annual social climate barometer, the "Opinion survey".

The COP describes precise commitments, strategies or policies in the area of environmental protection

The COP stipulates the commitment of OETKER COLLECTION with regard to the environment in terms of two core issues which are deemed to be the most relevant in view of the identified impacts: reduction in consumption and protection of the environment. The willingness is to comply with all new regulations and exceed them whenever possible. The contracts with the suppliers include environmental clauses. Improvement objectives have been set.

The COP describes the management systems in place to incorporate environmental management principles

The COP describes the innovative systems in place to reduce energy and water consumption. The question of biodiversity is particularly prevalent at the Hotel du Cap Eden-Roc at the Cap d'Antibes which covers approximately 8 hectares of land near to Natura 2000 zone and at Fregate Island Private. The environmental management system of the Hotel du Cap Eden-Roc and the Château Saint-Martin are certified by GreenGlobe, and that of Namaskar by Clef Verte [Green Key] (1st luxury hotel to obtain this certification in Morocco). The certification guarantees in particular that the systems were implemented after a prior analysis of the impacts, that managers have been designated and that measures to increase the awareness of the staff have been carried out.

The COP describes monitoring and assessment mechanisms in place to incorporate sustainable environmental management principles

The certification in particular guarantees that regular, internal and external audits are carried out on the environmental management systems in question and that the management reviews assess the effectiveness of these systems. Improvement objectives have been set.

The COP describes precise commitments, strategies or policies in the area of anti-corruption

The COP describes a strong commitment in terms of ethics and integrity which aims to achieve a zero tolerance with regard to corruption. An Ethical Business Code is in force at the Hotel du Cap-Eden-Roc, the Château Saint-Martin & Spa and l'Apogée Courchevel. It will be applied to all the OETKER COLLECTION in 2015.

The COP describes the management systems in place to incorporate anti-corruption principles

The COP shows management's desire to fight corruption. Responsibilities have been allocated and employees' awareness has been increased.

The COP describes the monitoring and assessment mechanisms in place to incorporate anti-corruption principles

The purchasing department and all purchasers have been made aware of the problem of corruption with regard to suppliers. In each of the hotels, the executive committee regularly reviews the anti-corruption policies to ensure they are applied properly and thereby improve results.

Taking action in support of broader United Nations objectives

The COP describes core business contributions to broader UN objectives and issues

The COP emphasises the fact that the commitment of OETKER COLLECTION in favour of a Social Responsibility contributing to Sustainable Development is not merely a stance but is directly linked to its economic model and strategy. All the elements described in the COP make it easier to understand how it is a strategic lever and a lever of change and how it is understood and used by all employees.

The COP describes social strategic and philanthropic investments

The COP gives numerous examples of social investments and philanthropic contributions linked to the core business or to the operational context of the company.

The COP describes advocacy and public policy commitment

The decision to join the Global Compact in 2014 shows the desire of OETKER COLLECTION to formalise its commitment in favour of the sustainable development objectives that are promoted by the UN.

The COP describes partnerships and a collective action

The COP highlights two essential levers of partnerships and collective action. The first concerns actions conducted in collaboration with public or private local stakeholders. The second refers to the action undertaken by OETKER COLLECTION in its sphere of influence by use of its sustainable and responsible purchasing policy.

Governance and leadership of the CSR

The COP describes the commitment of the CEO and management

The COP begins with an explicit public commitment from the CEO which reveals personal leadership concerning sustainable development and the commitment to the Global Compact. The CEO is at the head of the executive management team in designing the sustainable development strategy, defining the goals and supervising their implementation, in particular by means of an internal audit which is carried out by the CSR manager on all the hotels of the Collection.

The COP describes the adoption by the Board of Directors and oversight

As the OETKER COLLECTION is not a legal entity, it does not strictly speaking have a Board of Directors. Nevertheless, there is a governing body, which is chaired by Franck Marrenbach, which plays this role and assumes the responsibility and oversight of the long-term strategy and performance of the CSR. This supervisory body, which has entrusted Philippe Perd with implementing and monitoring the CSR policy, also approves the formal CSR report (Communication on Progress).

The COP describes stakeholder involvement

The COP refers to the diagnostics which was carried out at the end of 2013 and which allowed for the potential impacts of OETKER COLLECTION on its internal and external stakeholders to be identified. Following this diagnostics, it became apparent that although social dialogue involved internal stakeholders, consultations with external stakeholders needed to be better structured. The COP presents a stakeholders map establishing the priorities in terms of dialogue and consultation.

Assessment of the taking into account of the Global Compact criteria in the drafting of the COP

Based on our work, we did not find any significant failure to comply with the criteria laid down by the Global Compact in the drafting of the COP.

General findings

Generally speaking and in view of our due diligences, the Social Responsibility approach of OETKER COLLECTION appeared to us to be relevant with regard to the involvement of its managers, the taking into account of the stakeholders, the relevance of the commitments formalised and the consistency of the initiatives undertaken. Its efficiency appears to be satisfactory at this stage. Nevertheless, this finding should be confirmed next year when the approach will have been fully implemented in all OETKER COLLECTION hotels.

Paris, 13 March 2015

G rard SCHOUN

- (1) Signed responsible purchasing charters, monitored supplier rates, recycling Pac me mechanism, HDCER GHG emissions, HDCER balanced scorecard, LQA HDCER/CSM, complaints, JMAH payments, HDCER Netseenergy consumption statement, HDCER water consumption, PACA LPO report, remunerations, percentage of women in supervisor category (and executive category), recruitments, dismissals-terminations-automatically inactive, fatal accidents, frequency rate, severity rate, number of hours of training, number of collective agreements signed in the year, number of disabled employees hired, number of disabled employees and employees' satisfaction rate.