

OETKER COLLECTION

Masterpiece Hotels

CORPORATE SUSTAINABILITY REPORT 2017

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1.0 About this Report

The 2017 Corporate Sustainability Report provides an account of Oetker Collection efforts to support the implementation of the UN ten principles and engage with the UN Global Compact. The report is a transparent overview of the Group's Corporate Social Responsibility (CSR) performance in line with Oetker Collection 2015 CSR Strategy.

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

2.0 Reference Framework

The report covers the period 1 January 2017 to 31 December 2017 and it will be provided on an annual basis. It includes information from 8 of the 10 Oetker Collection masterpiece hotels. These include Brenners Park-Hotel & Spa, Château Saint-Martin, Eden Rock - St. Barths, Fregate Island Private, Hotel du Cap-Eden-Roc, L'Apogée Courchevel, Le Bristol Paris and The Lanesborough. Palácio Tangará and Jumby Bay are not included in the 2017 report as they joined Oetker Collection mid 2017 and their CSR Teams started operating in late December 2017. Also, it is important to take into account Eden Rock – St Barths closed at the end of August 2017 due to Hurricane Irma.

3.0 Organisation Overview

GROUP COMPANY COVERED BY THIS CSR REPORT: Oetker Collection OVERVIEW: Management and operation of high-end luxury hotels worldwide MANAGEMENT: The German company Oetker Hotel Management Company GmbH (OHMC) manages Oetker Collection HEADQUARTERS: Baden Baden, Germany

EMPLOYEES: 2200

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

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

REPORT ANNUAL BUSINESS REVENUE: 253 Mio€

ASSOCIATIONS: Leading Hotel of the World

2017 AWARDS:

- Best of the Best by Travel + Leisure,
- 2nd place of The Top 15 Hotel Brands by Travel + Leisure,
- Caroline Goux Top Luxury Sales Executive Worldwide by Luxury Travel Advisor,
- Best Hotel Group in Europe by Prix Villegiature,
- Frank Marrenbach Hotelier of the year by Virtuoso,
- Frank Marrenbach Leading Legend by Leading Hotels of the World,

Several awards for all hotels of the Collection

4.0 Reporting Structure and Content

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

Furthermore, the report structure and content is in line with the UN Global Compact Communication on Progress. Lastly, it provides an initial alignment to GRI Standards – Core option. The GRI Reporting Principles have yet to be implemented, however for the 2018 annual report the aim is to report in accordance with GRI Standards: Core option.

5.0 List of Material Aspects

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

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

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

The material aspects were not identified using the GRI Methodology, however the methodology will be adopted with development of Oetker Collection 2020 Corporate Responsibility Strategy. For future reporting we aim to cover the requirements in terms of Completeness, Balance, Comparability, Accuracy, Timeless, Clarity, Reliability, Stakeholder Inclusiveness and Materiality.

6.0 Chairman Foreword

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

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

Oetker Collection is a collection of currently 10 exceptional hotels, located in Europe, the Caribbean, Brazil and the Seychelles. Being part of 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: to provide our guests with a flawless service in a refined backdrop and ensure that their stay is an experience they will look back on with pleasure.

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

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 to provide a driving force in playing an expert & coordinating role)
- It is understood and embraced by all employees

Frank Marrenbach CHIEF EXECUTIVE OFFICER



7.0 Oetker Collection Profile

7.1 2017 Vision

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

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

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

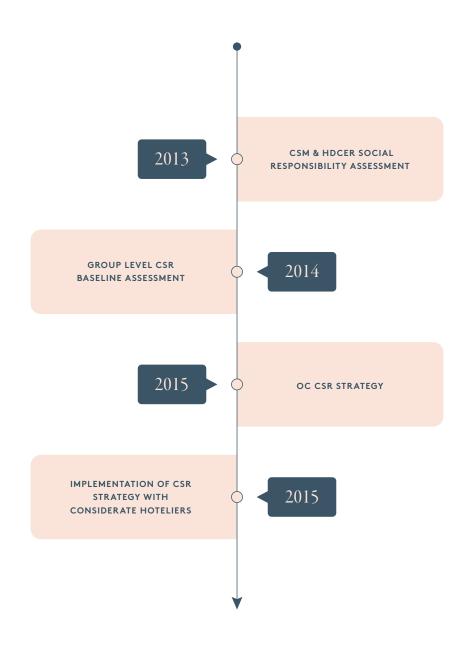
8.0 Corporate Social Responsibility

8.1 Baseline

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

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

- Identified the priority stakeholders regarding the impacts of the decisions and activities of the organisation, the risks and opportunities linked to these stakeholders 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...)
- Understood their interests depending on the subjects in question (chain value, region, professional sector, etc.)
- Included these interests in decisions with possible arbitration.



8.1 Baseline

Following from the assessment, in 2014 the management of the French properties conducted an analysis of their stakeholders, dividing their stakeholders into 9 categories:

SHAREHOLDERS

PARTNERS

Oetker Collection

Service partners Representatives Oetker partner hotels Relais & Chateaux

EMPLOYEES

Administrative staff Accommodation staff Catering staff Technical staff Sensitive persons Future employees

GUESTS & CONSUMERS

Resident guests External guests Prospective guests

PUBLIC AUTHORITIES & COMPLIANCE

Social bodies Tax bodies Regulatory bodies Safety commission Green Globe Certification

COMMUNITIES, CIVIL SOCIETY & NGOs Red Cross Association

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

SUPPLIERS

Partner suppliers Key account suppliers Local suppliers

MEDIA & COMMUNICATION

VIP Press (Gala, Figaro...) Generic press (Innovation SPA, Nice RV) TV PR agencies Internet Social networks Fairs & exhibitions Vocational training schools Trade unions



8.1 Baseline

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

DIALOGUE PRIORITY WITH THE STAKEHOLDERS

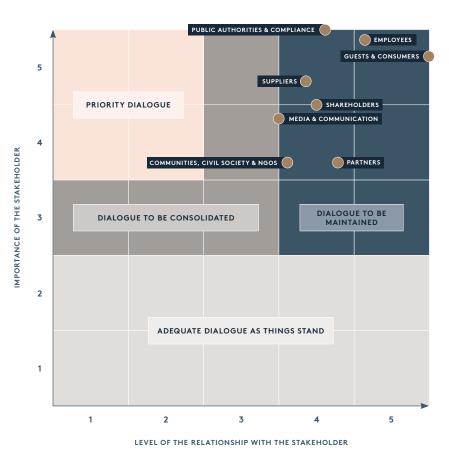


FIGURE 1. Château Saint-Martin & Spa and Hotel du Cap-Eden-Roc Dialogue Priority with the Stakeholders

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

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

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

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

The other five establishments were not assessed as:

- Fregate Private Island results were not received
- L'Apogée Courchevel the establishment only opened in 2013 2014
- The Lanesborough establishment was added to the collection in November 2014
- Palácio Tangará establishment was added to the collection in June 2017
- Jumby Bay Island establishment was added to the collection in October 2017

8.1 Baseline

The internal audit results were the following:

 TABLE 1. Octker Collection 2014 Internal Audit Results

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

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

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

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

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

8.2 Oetker Collection CSR Strategy

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

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

IDENTITY

OUR VISION

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

OUR VALUES

Protect, respect and develop sustainable solutions

OUR MISSION

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

OUR MOTTO & LOGO



PATRONS FOR A SAFE AND GUARANTEED FUTURE

8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals



8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals

This policy was validated by the Executive Committee in December 2015 and will be revised every 5 years. 2019 is the last year by which the 2015 CSR Strategy will be viable. Every year CSR objectives are established to achieve the commitments and principles set in the CSR policy.



Due to the change in CSR management structure in 2015-2016, the 2015 objectives a, b and e were not monitored. Also, objectives set for 2017 and 2018 (b and e) are flawed as they do not have specific absolute or intensity based target, timescale and key performance indicators. The 2019 objectives will be more specific to better monitor CSR performance. Below is a summary of the 2015 and 2017 objectives and their status quo.

8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals

TABLE 2. 2015 and 2017 Oetker Collection CSR Objectives

| | A Raise awareness of 90% of our employees on social responsibility | IN PROGRESS | | | | |
|-----------------|--|-------------|--|--|--|--|
| | B Reach the score of 4 on the Opinion Survey on the "communication, training and career prospects" questions | | | | | |
| 2015 OBJECTIVES | C Measure and compare our water and energy consumption | ACHIEVED | | | | |
| | D Incorporate sustainable purchasing in the purchasing strategy | | | | | |
| | E Reach a figure of 30% of local suppliers out of our total number of suppliers | IN PROGRESS | | | | |
| | | | | | | |
| | A Ensure gender equality, optimal health and safety conditions for all employees | IN PROGRESS | | | | |
| | B Measure, compare and reduce our water and energy consumption | ACHIEVED | | | | |
| | C Establish a comprehensive and integrated communication strategy for all CSR activities | ACHIEVED | | | | |
| 2017 OBJECTIVES | D Create an internal Green Champion Award system | ACHIEVED | | | | |
| | E Establish a new sustainable product for each month of the year, favouring local suppliers where possible | IN PROGRESS | | | | |
| | F Create relationship with local charity | ACHIEVED | | | | |
| | | | | | | |

9.0 CSR Governance

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

Considerate Hoteliers acts as Oetker Collection's CSR Department and is held accountable for the implementation of Oetker Collection CSR Strategy. Considerate Hoteliers is assisted by CSR Patrons from each property (table 3). CSR Patrons work in collaboration with their property CSR team to implement responsible actions. In order to assess CSR progress in each establishment, Considerate Hoteliers distributes a quarterly questionnaire to every CSR Patron. For the purpose of the annual Communication on Progress report, Considerate Hoteliers also distributed a UN Global Compact Questionnaire to all CSR Officers, Group Departments including Human Resources Team, Purchasing Team and Senior Analyst.

TABLE 3. List of Oetker Collection 2017 CSR Patrons and Teams

| HOTEL | CSR PATRON | CSR TEAM |
|---------------------------|--------------------------------------|-----------------------|
| BRENNERS PARK HOTEL & SPA | Pierre Laurent SCHAEFER | Brenners Green Keeper |
| THE LANESBOROUGH | Caitlin NEARY | Green Pearl |
| LE BRISTOL PARIS | Matthieu BOURDON Chloe LEIGNADIER | Bee Green |
| FREGATE ISLAND PRIVATE | Janske van de CROMMENACKER | Ecology Team |
| EDEN ROCK – ST BARTHS | Chloe GANSOINAT | Eden Angels |
| HOTEL DU CAP-EDEN-ROC | | Eden Earth |
| CHATEAU SAINT-MARTIN | Julie POIROT | Team Avence |
| L'APOGÉE COURCHEVEL | | BlablApogee |

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

 TABLE 4. Considerate Hoteliers stakeholder engagement

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

The remainder of the report will present 2017 Oetker Collection CSR actions in line with the Group's CSR Policy. Considerate Hoteliers will be referred to as Oetker Collection CSR Team or Group CSR Team.

10.0 CSR Standards

In 2017 Oetker Collection CSR Team developed 12 CSR Standards to establish tangible actions for Oetker Collection CSR Strategy. The CSR Standards are as follows:

| 1 MSC certified fish for all staff canteens and at least 30% in the restaurants | 12 RESPONSELE Inde Production Inde Production | 14 LEFE SECON WARTER | 17 PARTNERSHIPS FOR THE GAALS | |
|---|---|---|----------------------------------|------------------|
| 2 Recycle Nespresso capsules with B2B service or replace with biodegradable capsules | 12 ESPONSIBLE ORISINGTION AND PRODUCTION | 17 PARTINEPSHIPS | | |
| 3 Use Fairtrade certified products. IF you can't source Fairtrade certified products then know coffee, tea supplier's fair terms of trade with farmers | 8 BECENT WORK AND ECONOMIC GROWTH | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | | 17 FOR THE GALLS |
| 4 Use only free range and organic eggs as well as poultry & avoid purchasing meat from intensive mass animal farming | 12 ESPINSIBLE ONISINATION AND PRODUCTION | 15 ^{UKE} | | |
| 5 Reduce plastic cups in staff canteens & all plastic material in-room e.g. plastic bottles, laundry delivery bags, slippers sleeves, newspapers bags | 13 Gunare | 14 below water | | |
| 6 Give guests the choice to change their towels and sheets at two days interval | 6 CLEAN INFER | 7 OFFORMARIE AND CLEAN THERRY | | |
| 7 Use biodegradable cleaning and laundry products | 6 CLEAN INFER | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | | |
| 8 Place guest room recycler baskets & recycling bins both in public areas (i.e. poolside), kitchen and back of house | 13 Remare | 14 LEFE BELOW WATER | | |
| 9 A Giving Bags provide the guest with the possibility to donate their clothes to charity B Bathroom amenities and soaps: giving to charities that have recycling programmes for these | 1 [№] Ř¥ŘŘŤ | | 17 PATTARENIPS FOR THE GOALS | |
| 10 Complete LED retrofits already started and share best practice with other engineers within Oetker Collection | 7 AFERMARIE AND DIEAN ENERGY | | | |
| 11 Use FSC certified paper and tissues or aim for paperless communication | 12 ESPONSIBLE OKNOMPTION AND PRODUCTION | 15 UTE 01 LAND | | |
| 12 Do not plant non-native invasive or endangered species | 14 Life BELOW WATER | 15 UTE ON LAND | | |

10.1 2017 CSR Standards Results

All Oetker Collection properties addressed the CSR Standards in 2017, except for L'Apogée Courchevel as the property had already closed when the standards were released. 2017 results are the following:

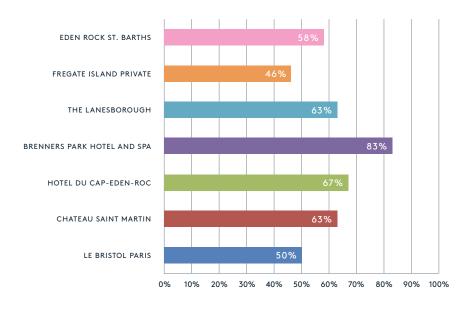


FIGURE 2. Oetker Collection property CSR Standard performance in 2017

Brenners Park-Hotel & Spa, Hotel du Cap-Eden-Roc, Château Saint-Martin & Spa and the Lanesborough led Oetker Collection Group having achieved more than half of the 12 standards. It is important to note up until Hurricane Irma in September 2017, Eden Rock – St Barths was performing very well with the implementation of the standards.

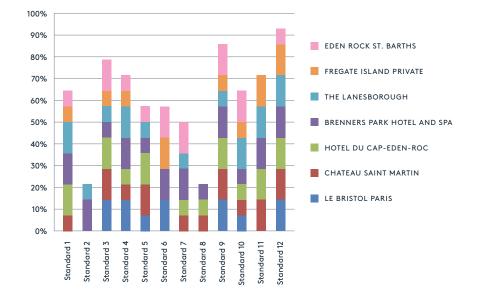


FIGURE 3. Oetker Collection CSR Standard performance

Standard 1, 3, 4, 9, 10, 11, 12 have been implemented by most of Oetker Collection properties. Standard 2, 7 and 8 are being addressed at Group level with the Group Purchasing Team.

10.2 CSR Standards Objectives

Taking into account the positive uptake of the 12 CSR Standards, for 2018 a list of 7 new standards will be added to the original set of standards. The standards will comprise additional Sustainable Development Goals and be further monitored to provide informative data at Group Level. In 2018 Group CSR Team will continue working with all CSR Patrons and properties to achieve all 19 CSR Standards.



11.0 Sustainability Awards & Certifications

GREEN GLOBE

- Le Bristol Paris
- Brenners Park-Hotel & Spa
- L'Apogée Courchevel

GREEN GLOBE GOLD STATUS

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

TRIPADVISOR GREENLEADERS

- Hotel du Cap-Eden-Roc (Bronze)
- Château Saint-Martin & Spa (Silver)

UN GLOBAL COMPACT ADVANCED LEVEL

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

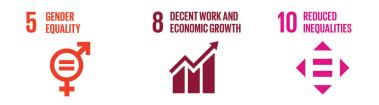






12.0 Commitment 1.

Ensure respect for human rights and optimise our working conditions



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

12.1 Organization Overview

The total number of Octker Collection employees in 2017 was 2200. The group does not yet have a group level system in place to track the number of employees subdivided by contract type (permanent and temporary) or gender; However by the end of 2018 they will be implementing a common HR software called Talent Soft to collect more employee data. Even though data is not available at group level, each individual property collects employee information and hotels regularly run workforce reports to match with budget.

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

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

Oetker Collection respects internationally recognised human rights frameworks, including the Universal Declaration of Human Rights and European Convention of Human Rights and Labour Laws. Oetker Collection Code of Conduct is the company's standalone statement of policy expressing their commitment to respect and support human rights. The document lays emphasis on the following points: ban on moral and sexual harassment, right to respect 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). To ensure its distribution, Oetker Code of Conduct is attached as an addendum to employment contract for management team member and integrated in handbooks for non-management team members. The Code of Conduct is monitored in each hotel through:

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

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

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

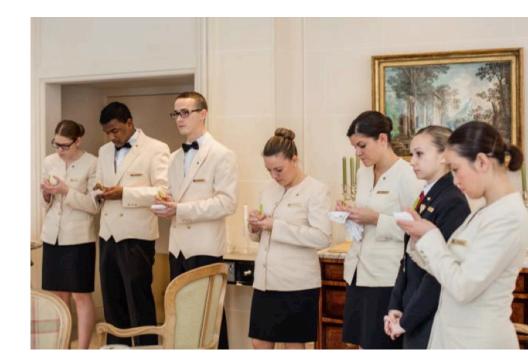


If team members or if a group of team members have a grievance, they can reach the following groups to expose their situation: HR Hotel Team, HR Corporate, OHMC Executive Team, Work Council Representative, Union Representative, Local Labour Law Authorities, Industry or Labour Court. If an incident of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

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

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

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



As a result of the Oetker Collection's Human and Labour Rights management approach in 2017 there were no Human or Labour Rights incident reports. Management is evaluated through an Engagement Survey. The survey is conducted yearly in each property and it is anonymous.

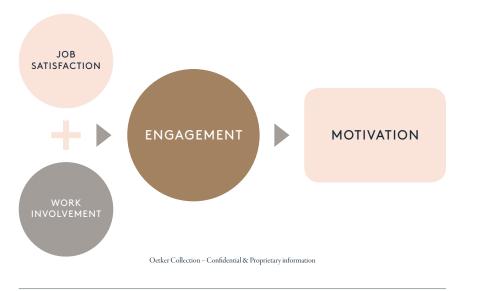


FIGURE 5. Oetker Collection Engagement Measurement

Engagement is composed by the addition of 'Satisfaction at Work' and 'Job Involvement':

- 'Satisfaction at work' is the correlation between the expectations and what is obtained in the work
- 'Job Involvement' is the work attachment, employee identification to his job, to his professional role.

The survey is composed by questions related to satisfaction and to involvement. Questions are split among 5 areas of organizational expertise that drive engagement. The results are obtained by 'Drivers of Engagement'.

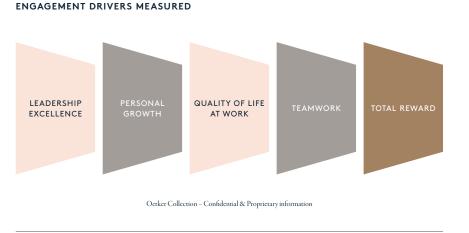


FIGURE 6. Oetker Collection Engagement Drivers Measured

The drivers reflect realistic actions to implement in work places. By acting on those 5 drivers, management is able to increase satisfaction and involvement.

Management accountability is to define and implement realistic and achievable action plans.

Engagement is a feeling produced by the addition of the satisfaction and involvement at work. There are 5 questions measuring engagement:

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

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

| 2017 – 2018* | LBP | врн | HDCER | сѕм | APG (saison) | FIP | ERO | LAN | TAN | JBI |
|--------------------------------|---------------|------------|----------------|----------------|--------------|-------------|--------------------|---------------|------------|-------------|
| DATE | November 2017 | March 2018 | September 2017 | September 2017 | March 2018 | TBC Q2 2018 | December 2016 (17) | February 2018 | March 2018 | TBC Q4 2018 |
| PARTICIPATION | 80,00% | 79,30% | 100,00% | 99,00% | 93,00% | N\A | 97,00% | 96,00% | 91,00% | N/A |
| RESULTS / ENGAGEMENT INDEX* | 4,50 | 4,00 | 4,65 | 4,64 | 4,56 | N\A | 4,32 | 3.94 | 4,25 | N/A |

 TABLE 5. Oetker Collection Engagement Results

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

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



2017 RESULTS FOR OETKER COLLECTION ACADEMY:

TABLE 6. Total number of Oetker Collection Academy activities

| TOTAL | TOTAL | TOTAL HOURS | TOTAL |
|----------|----------|-------------|--------------|
| PROGRAMS | SESSIONS | OF TRAINING | PARTICIPANTS |
| 21 | 160 | 883 | 909 |

12.3 Property Actions & Processes

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

TABLE 7. Oetker Collection Commitment 1 property actions and processes

| ACTIONS/PROJECTS /INITIATIVES | врн | сѕм | ER | FIP | HDCER | AC | ВР | LAN |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Work Councils & Unions | \checkmark | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | |
| Apprenticeships, work experience and internships/placements | | \checkmark |
| Themed lunches for staff | \checkmark | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | \checkmark |
| Gender Equality Review | | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | |
| Employment Risk Assessment | \checkmark |
| Staff Wellness Benefits | | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | \checkmark |
| Health & Safety Committee Meetings & Trainings | | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | \checkmark |

KEY TO HOTEL NAME ABBREVIATION:

| BPH | Brenners Park-Hotel & Spa | HDCER | Hotel du Cap-Eden-Roc |
|-----|----------------------------|-------|-----------------------|
| CSM | Château Saint-Martin & Spa | AC | L'Apogée Courchevel |
| ER | Eden Rock – St Barths | BP | Le Bristol Paris |
| FIP | Fregate Island Private | LAN | The Lanesborough |

12.3 Property Actions & Processes

BRENNERS PARK-HOTEL & SPA

- Head of Unions takes part in several meetings from IHK, Gewerkschaften etc.
- Provides employee responsibilities, compensations and benefits on information board with collective agreements for salary, working hours and vacation.

CHATEAU SAINT-MARTIN & SPA

- Working on obtaining a Gender Equality Label.
- Organise annual expression meeting to favour dialogue. These meetings are open to all employees and give them an opportunity to meet the Managing Director and the Human Resources Director.

EDEN ROCK - ST BARTHS

- Organised a variety of staff activities:
 - Staff photo contest: "Portray Eden Rock"
 - Monthly themed menus at the staff canteen
 - Staff undertook the mannequin challenge
 - Staff sailing trip
 - Celebrated Women's Day
 - Overnight stay for teams to experience the hotel and provide feedback
 - Free-diving experience
 - Monthly free wellness activity including hikes and yoga classes for all staff by their wellness coach Aminata
 - First-aid training for 25 employees
- Helped Housekeeping team with their daily task by providing them with a 'Paradise Keeper on Duty' cart that will facilitate the transportation of items from the storage rooms to hotel rooms and villas.



HOTEL DU CAP-EDEN-ROC

- Created a partnership with the car sharing smartphone application WEVER, with the aim to bring colleagues to share trips together, in order to free parking spaces and reduce carbon emissions. Three special parking spaces are available for car sharers. Employees can also benefit from gift cards in gas station, advantages at the road tollgate or even cinema tickets.
- Delivers fresh and local products to employees. The partnership with the cooperative of local producers "Vers le Bio" allows employees to order online fresh and high quality products from the producers of the region employees are really happy about the initiative!

L'APOGEE COURCHEVEL

- Directorate invested in the FIXACOUETTE system, which considerably reduces Housekeeping's musculoskeletal disorders. Indeed, this system allows to work the right back and arms down to reduce the risk of MSD and thus reduce the hardness of staff.
- Organized a photographic report on all departments to illustrate the solidarity between employees and the passion for their various professions to celebrate Happiness Day in March. The photographs were posted for the occasion in the staff restaurant.



LE BRISTOL PARIS

- Created an extensive communication training and coaching session for the entire Housekeeping team from manager to line team members. Also, added an elevator for bed base in each room to assist Housekeeping team with daily tasks.
- Created a library for employees.
- Created a relaxing and spa room for staff.

THE LANESBOROUGH

- Obeys to the national Modern Slavery Act Policy.
- Organised a Halloween pumpkin-carving contest for staff. 'It was nice to see different departments putting their own spin on the pumpkins; Engineering team made their pumpkin more 'technical' whilst the Garden room made their with a cigar.'

12.4 Objectives 2018

2017 Commitment 1 objective was the following: ensure gender equality, optimal health and safety conditions for all employees. Oetker Collection has partly achieved the objective having systems in place to optimise working conditions. However, in 2018 more specific objectives and monitoring systems will be put in place to track 2017 objective.

HR Corporate has set the following 2018 objectives to continue striving towards Commitment 1 of Oetker Collection CSR Strategy:

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

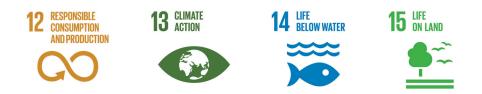
The gender equality work conducted at Château Saint-Martin & Spa and Hotel du Cap-Eden-Roc inspired Group CSR Team to:

• Establish equality label by 2019



13.0 Commitment 2.

Control our consumption and protect our environment



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

13.1 Organization Overview

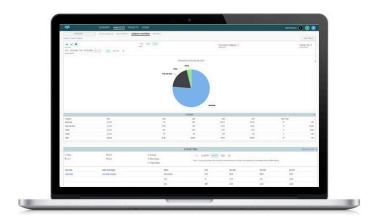
Environmental goals are integrated in the overall Oetker Collection CSR Strategy; therefore the group has not developed a separate environmental policy. Environmental commitments are addressed through Oetker Collection CSR Standards, as all standards directly or indirectly relate to the environment.

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

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

13.2 Environmental Monitoring

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



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

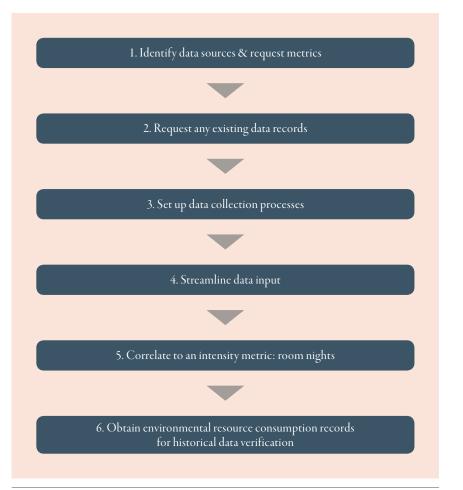


FIGURE 7. Establishing Environmental monitoring baseline for Oetker Collection properties

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

2017 Group environmental consumption has increased from previous year as shown in the table 8.

 TABLE 8. 2017 Group Year-on-Year Summary

| METRIC | ELECTRICITY | GAS | WATER | co₂ | соѕт |
|----------------------------|--|---|--------------------------------------|---|--|
| Year on Year % change | 0.5% | +4% | +7% | +4% | +1% |
| Per room night change % | 0.3% | +3% | +8% | +3% | +1% |
| Increase equivalent to | 110,244 light bulbs switched on for 24 hours | Heating 49 German homes for a year | 371,000 Average Showers | Driving 75 passenger cars for a year | 4 Group Con-Serve™ Subscriptions |

In line with overall increase in electricity, gas and fuel, also the group's total energy has increased in 2017 by 3.66 Terajoules from the previous year, which is a 3% increase. It is useful to calculate the total energy change (combined electricity, district heating and cooling, natural gas and fuel use) considering that some of the hotels generate electricity from diesel.

The annual analysis includes identification of hotspots and best practice for each property. One of the properties had their heating running to full power during the night, as shown in the heat map below. Following from the analysis the property reduced heating during the night by switching off the heater for short intervals between 00.00 to 05.00.

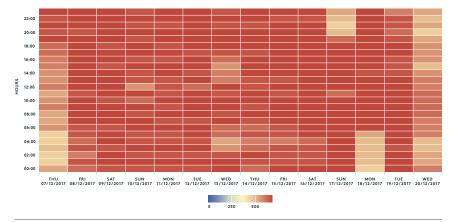


FIGURE 8. Heat map displaying gas consumed to heat the property from 07.12.17 to 20.12.17

Instead another property demonstrated best practice with a 3% and per room night 4% reduction in water consumption from the previous year. The reduction could have been led by the installation of new water meters and new aqua cleaning washing machine.

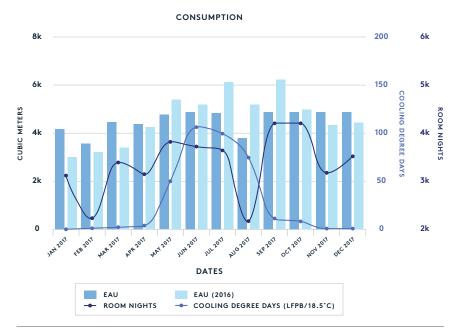
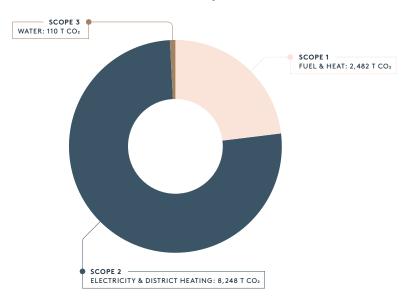


FIGURE 9. Year-on-year water consumption correlated to room nights & cooling degree-days

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

Due to the overall increase in consumption of all metrics the total emissions have increased by 352 T CO2 (4%) from the previous year. Calculation includes Scope 1, 2 and 3 emissions, but the increase has mainly occurred in Scope 1 emissions. Per room night emissions have increased by 3% from previous year.



EMISSIONS BY SCOPE (kg CO2)

FIGURE 10. Oetker Collection 2017 carbon emissions according to Scope 1,2,3

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

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

TABLE 9. Environmental initiatives in each property

| ACTIONS/PROJECTS /INITIATIVES | врн | сѕм | ER | FIP | HDCER | AC | BP | LAN |
|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Investment in resource efficient technology | \checkmark | \checkmark | \checkmark | | \checkmark | | \checkmark | \checkmark |
| Smart metering system | \checkmark | \checkmark | | | \checkmark | \checkmark | \checkmark | \checkmark |
| Conservation & Biodiversity | \checkmark | \checkmark | | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| External Auditing | \checkmark | \checkmark | | | \checkmark | \checkmark | \checkmark | |
| Food Waste | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark | | \checkmark |
| Sourced new sustainable products | \checkmark | \checkmark | \checkmark | | \checkmark | | \checkmark | \checkmark |

KEY TO HOTEL NAME ABBREVIATION:

| BPH | Brenners Park-Hotel & Spa | HDCER | Hotel du Cap-Eden-Roc |
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| FIP | Fregate Island Private | LAN | The Lanesborough |

BRENNERS PARK-HOTEL & SPA

- Employees are more aware of energy consumption as there is a Brenner's Green Keeper in almost all departments who provides continuous feedback to fellow colleagues.
- Achieved Green Globe certification for the first time.

CHATEAU SAINT-MARTIN & SPA

- Placed a new insect hotel. The wooden structure contains different compartments, each one adapted to the life and growth of one kind of insect. Now ladybirds, earwigs, bees and butterflies can benefit from it. The rich biodiversity of the garden already allowed the castle to be elected twice "Refuge for biodiversity" by the French NGO Ligue for Bird Protection, in 2013 and 2017.
- Equipped LED lights for the whole back office and guest car park.

EDEN ROCK - ST BARTHS

- Has electric utility vehicles including nine cars and a brand new electric bike which are ideal for various usage needs: people and luggage transport, maintenance, cleaning but also room service delivery or shopping needed for guests.
- Working closely with St Barths' Hotel Association to create a foundation in favour of wildlife's restoration.



FREGATE ISLAND PRIVATE

- The only resort in Oetker Collection with its own on-site conservation team. In 2017 the Island conservation team completed a long-awaited giant tortoise census. The last census dates from 2010. The aim of the census was to get a reliable population estimate of this ancient reptile on the island.
- Completed March June 2017 Conservation Report, to manage and track the Island's rich biodiversity.
- Reduced employee handbook by 20 sheets (25 to 5p). Considering the high staff turnover, the reduction of paper used for the employee handbook reduces paper consumption immensely.



HOTEL DU CAP-EDEN-ROC

- Has put in place eight electric buggies to move around between the different hotel buildings.
- Developed their own bio-waste recycling system in order to produce compost for their park.



L'APOGEE COURCHEVEL

- Changed food products order references to reduce packaging.
- Achieved Green Globe Certification.

LE BRISTOL PARIS

- Installed IQS to monitor and receive live consumption of electricity, gas and water.
- Sorting food and recycling other waste products in staff cafeteria. Each employee has to separate the paper and is responsible for waste segregation.

THE LANESBOROUGH

- Began tracking chefs and canteen food waste with the addition of new food waste bins in the kitchen and staff. Ultimately, the hotel aims to reduce their food waste.
- Turning off the A/C unit between 11pm to 6am to save on electricity when A/C is not needed.

13.3 2018 Objectives

2017 environmental objectives included the following:

- A Measure, compare and reduce our water and energy consumption.
- B Establish a comprehensive and integrated communication strategy for all CSR activities.
- C Create an internal Green Champion Award system.

Objective a and b have been achieved, through Con-Serve™ and the CSR Governance structure illustrated in section 13.1, respectively.

2017 CSR results led to the development of 3 environmental focused objectives for **2018** including:

- A Reduce electricity, water, fuel and heat consumption.
- ^B Complete all of the 2017 & 2018 CSR Standards by the end of 2018.

14.0 Commitment 3.

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



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

14.1 Quality & Fair Operating Practices

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



OETKER COLLECTION

FIGURE 11. Oetker Collection 2018 LQA Global Brand Ranking

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

14.1 Quality & Fair Operating Practices

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

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

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

14.2 Guest & Staff Communication

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

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

- Website: in 2017 Oetker Collection website was revamped with the addition of a CSR page. Staff and guests can visit and learn about existing programs on the website.
- Social Media:
 - Fregate Island Private has a dedicated Instagram page for their Conservation work:
 @fregateislandconservation.
 - At Brenners Park-Hotel & Spa the blogger Yasemin Loher promoted the Giving Bags initiative on her Instagram page during her visit in October 2017.
 - Chateau St. Martin, Hotel du Cap-Eden-Roc and L'Apogée Courchevel Facebook accounts publish sustainability news once a month.
- Workshops: since 2015, 5 properties conducted workshops to develop an on-site CSR Team and learn about Oetker Collection CSR Strategy.



- Presentations: Group CSR Team provides an overview of Oetker Collection CSR strategy and progress during the annual group summit. Operations and management staff attend the event. The CSR Team's attendance and presentation is to ensure sustainability remains a top priority.
- Daily Commitments & Bulletin Boards: at site level, CSR material is included in the Daily Commitments and can be viewed on staff bulletin boards.

14.3 Staff Activities

GREEN PEARL AWARD

In 2017, Group CSR Team established an award system for individual property CSR Teams. The award was provided to the CSR team who best performed in fulfilling Oetker Collection CSR Commitments and 12 CSR Standards. The winner was announced during the 2018 Leadership Summit, and the winner for 2017 was team Eden Earth from Hotel du Cap-Eden-Roc.

BRENNERS PARK-HOTEL & SPA

• Staff collected Streuobstwiesen harvest at the property. The produce was very limited in 2017 and therefore they could not produce apple juice.



CHATEAU SAINT-MARTIN & SPA

- Organised a photography competition themed 'The values of the Oetker Collection': Family, Enjoyment, Authenticity, Creativity, Liability, Humility and Subtlety. All employee pictures were displayed in the staff restaurant.
- Hotel Beekeepers taught employees the running of a beehive, through hands-on workshops.

EDEN ROCK - ST BARTHS

- Staff organised clean-up sessions around the hotel following Hurricane Irma.
- Participated in the St Barths CSR forum on July 19th.



14.3 Staff Activities

FREGATE ISLAND PRIVATE

- Organised an event called clean up the world action on Saturday 23rd of September 2017 following from Clean Up the World day. The event was organised to raise awareness amongst staff to keep the environment clean.
- The Seychelles Sea Turtle Festival was held on Saturday 5th of August 2017 in Victoria, the capital of Seychelles. With a small delegation, the Fregate Island Conservation team represented the island, by joining the walking march and hosting a stand at the exhibition with information on the island's monitoring programme, face painting and quiz activities. It was a success! Many school kids and conservation organisations joined forces to create awareness for the protections of sea turtles.



HOTEL DU CAP-EDEN-ROC

• Organised staff CSR quiz. The quiz included 10 CSR questions illustrating different departmental activities. The event resulted with 6 winners.

L'APOGÉE COURCHEVEL

- Organises regular meetings and events with management and employees to optimize social dialogue.
- Distributed pocket ashtrays to staff following the partnership with the Mountain Riders association to educate employees not to throw their cigarette buds on the tracks.

LE BRISTOL PARIS

- Developed a CSR Team named 'Bee Green'. The team meets on a quarterly basis.
- Staff participated in 'Imagine for Margo' run in September 2017, an association combatting child cancer.

THE LANESBOROUGH

• Implemented the Green Pearl Award. An award system for the best green initiative completed by hotel departments. The 2017 annual green pearl award was announced during hotel staff party – the winner was the Kitchen Team for their implementation of food waste bins. The runners up were: Laundry Team for reducing plastic packaging for guest dry-cleaning; Security Team for recycling batteries; Back of House for introducing the cardboard compactor.

14.4 Guest Activities

BRENNER PARK HOTEL & SPA

• Created signage of the hotel's surrounding flora. Guests can visit the park and learn about the surrounding environment.



CHATEAU SAINT-MARTIN & SPA

- The Saint-Martin is the signature cocktail of the Rossini bar in the hotel. It is partly created using a precise mix of rum, liqueur of peach from Vence and syrup made in the castle. This syrup combines honey coming from the bechives of the hotel's park, but also rosemary, harvested every week in the hotel's garden. A sophisticated beverage, highlighting the local patrimony and loved by clients.
- In partnership with the French Riviera Bird Protection League, and for the occasion of the Festival of Gardens, the hotel hosted a guided tour of the 14 acres park for visitors of all ages' greater enjoyment.



14.4 Guest Activities

FREGATE ISLAND PRIVATE

- Guest dishes are made with fresh produce from their own plantation and hydroponics system that includes 50 varieties of fruit and vegetables.
- Offer guest nature walks to learn about complexity and fragility of local ecosystems. One guest was so amazed that he adopted 5 tortoises to support the island's conservation program.



HOTEL DU CAP-EDEN-ROC

- Offers guests the opportunity to contribute to the protection of the Mediterranean fauna and flora by making a donation that will be given in full to their partners: the association 'Pour une planete bleue' and TEspace Mer et Littoral'. In return, guests can take a peluche turtle home with them.
- At the Kids Club the manager organised an activity to raise environmental awareness.
 With the help of her dynamic team and of a plastic artist of Antibes, she initiated the creation with the children of a whale sculpture, made of plastic wastes from the seacoast. A playful and original way to involve future generations with the protection of the environment!



L'APOGÉE COURCHEVEL

- Offer an Ibex toy for sale whose contributions will be donated directly to the Vanoise National Park to contribute to the protection and development of the species in the Alps.
- Developed tools to educate Kids Club kids about sustainable development and protection of the mountain environment.

LE BRISTOL PARIS

- Offer guests KOS SPA products that are organic and created specifically for the Hotel.
- Provide guests with honey produced from their beehives, installed on their rooftop.

THE LANESBOROUGH

- Provide organic and local SPA product, Ila products, for guest use.
- Changed laundry procedure where guest laundry is no longer wrapped in plastic, but instead sent straight to the guest room.



14.5 2018 Objectives

For 2017 no specific Group level objectives were set to achieve Commitment 3. Group quality and fair operating practices are continuously evaluated and improved through property internal objectives determined by the LQA process.

Also, as depicted, each property offers many staff and guest CSR activities. For 2018, Group CSR Team will develop a group level guest & staff activity. The aim is to create greater synergies between Oetker Collection Masterpiece Hotels.

15.0 Commitment 4.

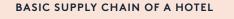
Take part in the social, cultural and economic development of the regions in which we operate



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

15.1 Sustainable Purchasing

Oetker Collection supply chain is dependent on hotel and customers requirements as shown in figure 10. Oetker Collection main groups of purchase include: beverage, food, cleaning supplies, guest supplies, operating equipment and others (IT, printing...). Within each group of purchases, specific agreements are negotiated to allow hotels to benefit from specific pricing conditions.



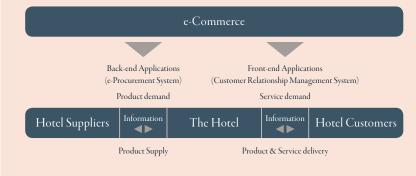


FIGURE 12. Oetker Collection supply chain

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

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

CSR compliance is screened following the process below:

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

15.1 Sustainable Purchasing

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

The Responsible Purchasing Charter is readily available on Oetker Collection CSR page. Further distribution and awareness is provided by Oetker Collection Purchasing team who:

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

A questionnaire was developed in 2017 to ensure suppliers were aware of Oetker Collection CSR Strategy and to monitor supplier's sustainability performance.

The Responsible Purchasing Charter Supplier Questionnaire was provided to 30 Oetker Collection vendors with a 30% response rate. 22% of the suppliers worked with the whole group and the remainder supplied individual Oetker Collection properties. The number of suppliers who completed the questionnaire was very low. Conclusively:

- 1. By 2019 all 50 Oetker Collection vendors need to be provided with the Responsible Purchasing Supplier Questionnaire.
- 2. By 2019 individual hotel suppliers who present the greatest expenditure on hotel's costs will be provided with the Responsible Purchasing Supplier Questionnaire.
- 3. By 2019 the response rate needs to increase to 50%.

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

Oetker Collection believes in favouring local producers to highlight the cultural identity of the Masterpiece of Hotels and further work towards: quality, regional presence and reduction in GHGs. Local is defined as products sourced within 200km from hotel. Only 15% of hotels worked with local suppliers (Figure 13). The local suppliers constituted food and beverage. However it is positive that 56% of the suppliers operate within their local region. Also, it is important to note the vendors surveyed in 2017 was not a representative sample of Oetker Collection, it being limited to 9 vendors.

As stated above to improve the data sample in 2018 individual hotel suppliers who present the greatest expenditure on hotel's costs will be provided with the Responsible Purchasing Supplier Questionnaire. This should lead to an increase in number of local suppliers to 30% by 2019.

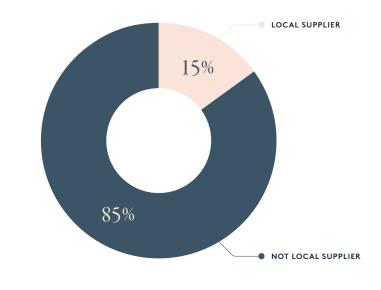


FIGURE 13. Oetker Collection local supplier's

15.1 Sustainable Purchasing

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

- 56% of the suppliers undertook a sustainability activity in terms of partnership, certification and/or reports and charter.
- 33% of the suppliers had a sustainability certification. The most common certification was Ecolabel, ISO 14001 and OHSAS 18001.

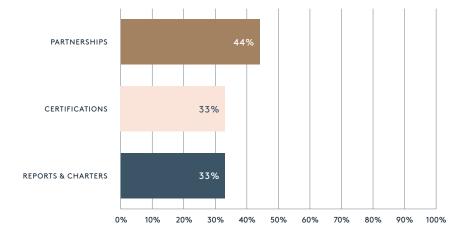


FIGURE 14. Oetker Collection supplier's sustainability performance

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

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

- 78% of suppliers have a discrimination policy.
- 67% of the suppliers are aware of Oetker Collection Anti-bribery Policy.
- 44% of the suppliers have an effective anti-bribery program for their operations.

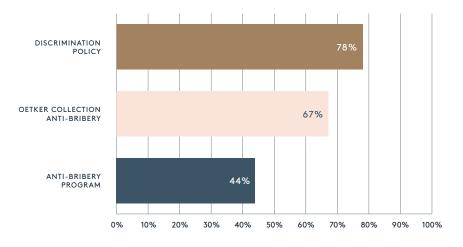


FIGURE 15. Oetker Collection supplier's awareness

15.1 Sustainable Purchasing

Following from the results Oetker Collection needs to ensure 100% of suppliers are aware of Oetker Collection Responsible Purchasing Charter and Oetker Code of Conduct by 2019.

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

- Amongst the suppliers the most common environmental initiatives are energy savings and the recycling/reuse of waste.
- The environmental initiative with least uptake is soft mobility vehicles deliveries.
- Anti-biotic free food products and eco-labelled cosmetic & maintenance products have low uptake, as they are not applicable to all suppliers.
- New categories shared by suppliers include carpooling and environmentally friendly cleaning products.

Following from environmental initiatives results, new categories will be included in the 2019 questionnaire. Also, in 2018 results will be shared with the suppliers and Oetker Collection Hotels to share best practice and create awareness.

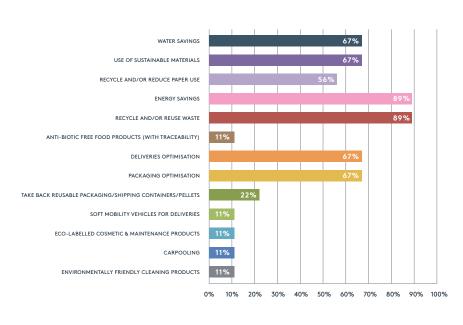


FIGURE 16. Oetker Collection supplier's environmental initiatives

15.2 Charities & Donations

Oetker Collection coordinates its efforts with other organizations and initiatives to amplify and not negate or unnecessarily duplicate – efforts of other contributors. In 2017, 8 Oetker Collection properties have raised a total of €33,909.74 and have worked with 33 different charities.

BRENNERS PARK HOTEL & SPA

- Organised a truck of presents to go to children in need in Romania, Moldavia and Ukraine. In 2017 they managed to pack 158 parcels that is a new record. The initiative is organised by members of the Round Table, Lady Circle and Old Tablers Germany.
- Work with The Freundeskreis Lichtentaler Allee, the local Lions Club and local Rotary Club.

CHATEAU ST.MARTIN

• Works with the Red Cross for material donations. In 2017 donated 690 shampoos & shower gel units and 143 slippers.

EDEN ROCK - ST BARTHS

- Each year in St Barth the traditional Gustavialoppet race highlights the links between St Barth and the city of Pitëa in Sweden. In view of the events of September, the race was replaced by a solidarity march "Loppet / Solidarité 2017". The donations collected were donated to the Saint Barth Foundation. Eden Rock-St Barth has participated on all levels and a highly motivated team has covered the 9km walk.
- Hosted charity dinner at Le Bristol for Saint Barthelemy. Almost 1000 euros were raised during a Quiz organised by the Lions Club. The aim of the event was to raise funds in order to help the local community in Saint Barths who lost their home during Irma Hurricane. Eden Rock-St Barths had three teams: "ER Strong", "My ER Story" and "Solid as a Rock".

FREGATE ISLAND PRIVATE

- Participated in regional working fair to provide working opportunities to locals.
- Working closely with local NGO called Green Island Foundation.
- Many local students from Seychelles Academy and University visited the island and completed internships on the island. The aim was to make them enthusiastic about conservation and hopefully choose a conservation career.

HOTEL DU CAP-EDEN-ROC

- Worked with Sante/Social, Ligue contre le Cancer, Croix Rouge Francaise, Un Toit Pour les Vieux, Freres Pauvres, Association Williams music (M.Elio Altomari), Association Alison (Ph Gauteul), Amicale de anciens marins, Corporation des Marins D'antibes, J.M.A.H Aide Humanitarie Togo, Espace Mer et Littoral – Projet Tortues
- Donated 24,400€ to charities.

L'APOGÉE COURCHEVEL

- Launched the operation "More trees, more life" in partnership with 2 local schools, the department of green spaces of the town and the National Office of Forests. More than 50 trees were planted in Courchevel Moriond.
- Collect plastic caps for the benefit of the association "Bouchons d'amour", and corks for the benefit of the association "France Cancer". In addition, collect unused pairs of slippers and flip flops by our customers to give to the Red Cross, as well as amenities such as shower gels and shampoo.
- Met the Mountain Riders association with whom they created a partnership in 2017. Mountain Riders is a group of enthusiasts, committed to educating about sustainable development since 2001.

LE BRISTOL PARIS

- Donated to Association Ninoo, French Heritage society, Debours pompiers de Paris, Associaition enfants de bam, BRI nationale, Police – Eboueurs a total of 8459.74€.
- Participated in 'La table des chefs' to help children by hosting a charity dinner at their property.
- Installed a box for tights recycling system for 'La Croix Rouge' to create bandage.

THE LANESBOROUGH

- Working in collaboration with Red Cross in 2017 donated 37 black bags of clothes to the charity.
- Planted two fruit trees with 'Trees for Cities' in honour of the Green Pearl Award winner.

15.3 2018 Objectives

2017 Objectives in relation to Commitment 4 were partly completed. All properties have acquired local and sustainable products throughout 2017, however this process did not occur every month of the year.

The last objective of Commitment 4, 'Create relationship with local charity' was accomplished by all Oetker Collection properties.

Looking forward, Sustainable Purchasing 2018 actions include the following:

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

16.0 Moving Forward

The report provides an overview of Octker Collection CSR status. Having an understanding of the Group CSR position assists with determining the direction for 2018 and future developments.

Overview of 2018 Objectives to be achieved by Oetker Collection CSR Team, HR Team, Purchasing Team and CSR Patrons, include:

| | 1 List of 7 new standards to be added to the 12 CSR Standards | |
|---------|---|--|
| | 2 Implement a common HR software called Talent Soft to monitor employee data | |
| | 3 Continued compliance with local laws and regulations | |
| СОММ. 1 | 4 Decrease in employment risks | |
| COMM. I | 5 No litigation unless we have a very strong court case | |
| | 6 Reinforce Team Member welfare understanding and assessing the local living conditions | |
| | 7 Lead by our Company Values. Managers must be exemplary on leading by values | |
| | ⁸ Establish equality label by March 2018 | |
| | 9 Reduce electricity, water, fuel and heat consumption | |
| СОММ. 2 | 10 Complete all of the 2017 & 2018 CSR Standards by the end of 2018 | |
| СОММ. 3 | 11 Create Group level guest and staff activity | |
| | By 2019 all 50 Oetker Collection vendors need to be provided with the Responsible Purchasing Supplier Questionnaire. | |
| | 13 Questionnaire | |
| | 14 By 2019 the response rate needs to increase to 50% | |
| СОММ. 4 | ¹⁵ Oetker Collection Properties need to increase number of local suppliers to 30% by 2019 | |
| | Group needs to ensure 100% of suppliers are aware of Oetker Collection Responsible Purchasing Charter and Ethical Charter by 2019 | |
| | 17 In 2018 share results with suppliers and all OC Hotels for best practice and awareness | |
| | 18 Include new environmental initiative in 2019 Responsible Supplier Questionnaire | |

| GRI DISCLOSURE NUMBER | DISCLOSURE TITLE | DISCLOSURE/REPORT LOCATION | PAGE |
|-----------------------|--|--|--------------------|
| 102 -1 | Name of the organization | Oetker Collection | 3 |
| 102 - 2 | Activities, brands, products, and services | Oetker Collection is a hotel collection of 10 masterpiece hotels worldwide. The organization manages and operates the high-end luxury hotels. Each hotel is unique one-of-a-kind, a brand by itself. | 3 |
| 102 - 3 | Location of headquarters | Schillerstrasse 7, Baden Baden, 76530 | 3 |
| 102 -4 | Location of operations | Germany, France, Great Britain, Seychelles, St Barthelemy, Antigua, Brazil | 3 |
| 102 - 5 | Ownership and legal form | Oetker Collection is managed by the German company Oetker Hotel Management Company GmbH (OHMC). | 3 |
| 102 - 6 | Markets served | a. Markets served, including: i. Baden-Baden (Germany), Paris (France), Antibes (France), Vence (France), Courchevel (France), London (Great Britain), Sao Paulo (Brazil), St Barthelemy (France), Seychelles (private island), Antigua (private island) ii. Tourism industry - hospitality iii. Individuals from worldwide markets | 3 |
| 102 -7 | Scale of the organization | a. Scale of the organization, including: i. 2200 employees across the Collection ii. Management Company + 10 hotels iii. Total business volume of the Collection: 253 Mio € v. Hotels: around 125.000 room nights per year | 3 |
| 102 -8 | Information on employees and other workers | Refer to Section 12.1 Organization Overview | 20 |
| 102 -9 | Supply chain | Refer to Section 15.1 Sustainable Purchasing | 41 |
| 102 -10 | Significant changes to the organization and its supply chain | a. Significant changes to the organization's size, structure, ownership, or supply chain, including: i. Refer to section 2.0 Reference Framework ii. Not Applicable iii. Changes in the location of suppliers in line with point a.i., no changes in the structure of the supply chain, or relationships with suppliers, including selection and termination. | 3 |
| 102 - 11 | Precautionary Principle or approach | Group CSR Strategy is incorporated in all operations. Operational decisions and actions take into account Group CSR commitments and therefore by keeping a precautionary approach. | - |
| 102 - 12 | External initiatives | Refer to Section 1.0 About this report, Section 4.0 Reporting structure and content, Section 8.1 Baseline, Section 8.3 Oetker Collection CSR Policy aligned to UN Sustainable Development Goals, Section 12.2 Human Rights, Working Relations & Conditions | 3, 4, 7, 11, 21 |
| 102 - 13 | Membership of associations | a. Leading Hotel of the World | - |
| 102 - 14 | Statement from senior decision-maker | Refer to Section 6.0 Chairman foreword | 5 |

| GRI DISCLOSURE NUMBER | DISCLOSURE TITLE | DISCLOSURE/REPORT LOCATION | PAGE |
|-----------------------|--|--|------------|
| 102 - 16 | Values, principles, standards, and norms of behaviour | a. A description of the organization's values, principles, standards, and norms of behaviour. Oetker Code of Conduct – where can it be found? | 11, 20 |
| 102 - 18 | Governance structure | a & b. Executive Committee Of Oetker Collection | - |
| 102 - 40 | List of stakeholder groups | Refer to section 8.1 Baseline | 7 |
| 102 - 41 | Collective bargaining agreements | 100% of Oetker Collection employees are covered by collective bargaining agreements. | 21 |
| 102 - 42 | Identifying and selecting stakeholders | Refer to section 8.1 Baseline | 7 |
| 102 - 43 | Approach to stakeholder engagement | Refer to section 9.0 CSR Governance | 11 |
| 102 - 44 | Key topics and concerns raised | Refer to Section 12.2 Human Rights, Working Relations & Conditions, Section 13.1 Organization Overview, Section 14.1 Quality & Fair Operating Practices | 21, 20, 35 |
| 102 - 45 | Entities included in the consolidated financial statements | a. OHMC b. Not Applicable | - |
| 102 - 46 | Defining report content and topic Boundaries | Refer to Section 2.0 Reference framework and Section 4.0 Reporting structure and content | 3, 4 |
| 102 - 47 | List of material topics | Refer to Section 8.1 Baseline | 7 |
| 102 - 48 | Restatements of information | Not applicable as the document first group report. | - |
| 102 - 49 | Changes in reporting | Not applicable as the document first group report. | - |
| 102 - 50 | Reporting period | Refer to Section 2.0 Reference framework | 3 |
| 102 - 51 | Date of most recent report | Not applicable as the document first group report. | - |
| 102 - 52 | Reporting cycle | Refer to Section 2.0 Reference framework | 3 |
| 102 - 53 | Contact point for questions regarding the report | Xenia zu Hohenlohe, <u>http://consideratehoteliers.com/</u> | - |
| 102 - 54 | Claims of reporting in accordance with the GRI Standards | Refer to Section 4.0 Reporting structure and content | 4 |
| 102 - 55 | GRI content index | Refer to Section 17.0 GRI Index | 48 |
| 102 - 56 | External assurance | For the first Oetker Collection Group report external assurance was not requested, however for future reports Oetker Collection will evaluate practice. | - |

| GRI DISCLOSURE NUMBER | DISCLOSURE TITLE | DISCLOSURE/REPORT LOCATION | PAG |
|-----------------------|---------------------------------|---|-----|
| 302 - 4 | Reduction of energy consumption | a. Oetker Collection Group's total energy has increased in 2017 by 3.66 Terajoules from the previous year, which is a 3% increase. | 30 |
| | | b. This calculation takes into account various energy sources such as: electricity fuels: diesel, petrol natural gas district heating or cooling steam | |
| | | c. This calculation compares total energy use of the Oetker Group in 2017 compared to previous year (2016). This comparison was chosen to align the calculation to the reporting period of this full report and to report on the most recent trends. | |
| | | d. The calculation is based on 8 Oetker hotels that were open during both 2017 and 2016, which include Brenners Park- Hotel & Spa, Château Saint-Martin & Spa, L'Apogée Courchevel, Eden Rock – St.Barths, Hotel du Cap-Eden-Roc, Fregate Island Private, Le Bristol Paris and The Lanesborough. Considering that the Oetker group tracks the consumption of the individual properties per various energy sources in a Con-Serve⁻ data management system and considering that Con-Serve⁻ is able to automatically translate the tracked data of various energy sources into a kwh, energy equivalent, this tool was used for the calculation. The converted values were exported into a CSV file to calculate the year on year difference in kWh value. The kWh value was converted into Joules to comply with the 302-4 GRI guideline. To allow for like for like Year on Year comparison calculations: are based on Jan-July period only for Eden Rock as the hotel was closed between August 2017-December 2017 | |

| GRI DISCLOSURE NUMBER | DISCLOSURE TITLE | DISCLOSURE/REPORT LOCATION | PAGE |
|-----------------------|---|---|------|
| 305 -5 | Reduction of GHG emissions | a. The Oetker Collection's total emissions have increased by 4% - 352 tonnes CO2 from the previous year. b. The calculation foremost includes CO2 emissions, although whenever CO2 equivalent factors where available these were applied. c. In line with the rest of the report, the calculation compares 2017 performance with the previous year (2016). d. Calculation includes Scope 1, 2 and 3 emissions, but the increase has mainly occurred in Scope 1 emissions. See below for the emission boundary. | 31 |
| | | e. The calculation is based on 8 Oetker hotels that were open during both 2017 and 2016, which include Brenners Park-Hotel & Spa, Château Saint-Martin & Spa, L'Apogée Courchevel, Eden Rock – St.Barths, Hotel du Cap-Eden-Roc, Fregate Island Private, Le Bristol Paris and The Lanesborough. Considering that the Oetker Group tracks the consumption of the individual properties per various energy sources in a Con-Serve [–] data management system and considering that Con-Serve [–] is able to automatically calculate emissions based on local emission factors, this tool was used for the calculation. The GHG inventory included Scope 1, 2 and 3 emissions, however, some emission sources are not yet tracked in Con-Serve [–] and therefore not included in the calculation, these exclusions are: | |
| | | Scope 1: • Not all transport on Oetker owned vehicles is measured • We do not track fugitive emissions • Other | |
| | | Scope 2: We only currently track water consumption Waste is not tracked yet Guest travel is being recorded for some of the properties, however, is not yet tracked as a group Other To allow for like for like Year on Year comparison calculations: are based on Jan-July period only for Eden Rock as the hotel was closed between August 2017-December 2017 | |
| 308 - 1 | New suppliers that were screened using environmental criteria | exclude Jumby Bay Island and Palacio Tangara hotels that were not yet opened/did not belong to the group in 2016 Refer to Section 15.1 – Sustainable Purchasing | 44 |

18.0 Appendix

Documents mentioned through out the report can be available upon request. These documents include:

- Oetker Collection Ethical Charter
- Oetker Collection Sustainable Purchasing Policy
- Oetker Collection Code of Conduct
- Fregate Private Island Conservation Report

For further information please contact, Xenia zu Hohenlohe <u>hohenlohe.xenia@consideratehoteliers.com</u>