

Whistleblowing Policy

Preamble

Various scandals in companies worldwide have shown in the past that no company is immune to individual employees or entire departments violating applicable laws and regulations, and thus causing short-, medium- or long-term damage to the company.

An essential element to prevent such legal violations or to clarify these afterwards is an internal whistleblowing system. Aroundtown SA (hereinafter referred to as “**Aroundtown**”) has implemented such a whistleblowing system.

To keep internal whistleblowing as simple as possible, Aroundtown provides employees with several options for reporting. As a technical professionalized provider, Aroundtown is in cooperation with Business Keeper GmbH to introduce a digital reporting system as one of the reporting channels accessible to whistleblowers (the “**BKMS System**”). The purpose of this policy is primarily to define the procedure and authority in connection with the BKMS System.

Aroundtown takes legal requirements for the protection of whistleblowers and its duty of care and responsibility as an employer very seriously. Aroundtown’s management considers every whistleblower to be a valuable source of information about possible internal legal violations. An employee who exposes a whistleblower, or otherwise retaliates against the whistleblower for their reports, or for any other reason, in violation of this Policy and/or any other policy introduced by Aroundtown from time to time and incorporated into the terms of employment, may face sanctions under employment law. Therefore, no whistleblower should fear retaliation or similar for the conduct they report. Aroundtown encourages every employee to make use of the possibility of the internal whistleblowing system if necessary, and to report experienced or observed misconduct.

1. Purpose of the whistleblowing system

Aroundtown strives to make it particularly easy for potential whistleblowers to make reports and to ensure that they are fully protected. Of course, the possibility for each employee to contact their superior and/or another person of trust remains available.

As part of this, specifically the BKMS System enables employees - without fear of retaliation - to report company-related illegal and/or unethical behaviour and thus prevent compliance risks from materialising.

2. Scope of application

This policy applies worldwide to Aroundtown SA, its subsidiaries and its affiliates (Section 15 of the German Stock Corporation Act) ("**Aroundtown Group**") and to all companies in which the Aroundtown Group has an interest to the extent that they agree to be bound by the policy (all companies covered by the scope are referred to as "**Aroundtown**"). This policy applies to all employees, including supervisors and trainees, as well as Aroundtown's management, without exception. This policy also applies to all workers, temporary agency workers and including self-employed persons working for Aroundtown, volunteers, people working for contractors, subcontractors and suppliers, etc.

3. Issuance of advisory notices

3.1. The subject of a report should be any experienced or observed misconduct by employees or others working with Aroundtown.

3.2. Without prejudice to the reporting of (sexual or other) harassment as explained in clause 3.3 below, the whistleblower should not report any misconduct unrelated to Aroundtown and its business activities. This includes, in particular, incidents that solely concern the private or intimate sphere of an employee as well as obviously minor inconveniences (e.g. deviation from the menu of the canteen, short-term defect of the coffee machine, accidental non-greeting of colleagues, etc.).

3.3. Misconduct is any behaviour that is contrary to legal provisions, internal guidelines or company agreements. In particular, misconduct shall be deemed to be:

- Criminal offences, in particular but not exclusively, in the areas of corruption, criminal competition law, fraud and breach of trust, violation of legally protected business secrets, the criminal manipulation or misuse of data;
- Criminal offences and administrative offences in the areas of environmental protection and occupational safety;
- Attempted and preparatory acts leading to criminal offences;
- Serious administrative offences;
- Deliberate concealment of the wrongdoing;
- Violations of labour law provisions that may be grounds for termination of employment without notice for cause, including in particular violations of the legal provisions on equal treatment / non-discrimination, (sexual) harassment and mobbing.

3.4. Only those reports should be made where the whistleblower has a good faith belief that the facts they are reporting are accurate. Whistleblowers are not considered to be acting in good faith if they are aware that a reported fact is untrue. If there is any doubt, the relevant facts must be presented not as a fact but as an assumption, assessment or statement by other persons.

3.5. If the whistleblower reports facts that they know to be untrue, Aroundtown reserves the right to penalize such conduct.

3.6. Similarly, Aroundtown reserves the right to sanction any conduct that is likely to impede whistleblowers in their reporting.

4. Possibility of anonymity

Every whistleblower is free to submit a report anonymously. Please note that any reporting channel other than BKMS System may potentially have limitations with respect to anonymous reporting (e.g. if you meet in person, anonymity cannot be ensured).

5. Reporting channels

There are several ways for potential whistleblowers to report experienced or observed misconduct. Reports can be submitted via:

a. Post

Group Compliance
ATCP Management GmbH
Wittestraße 30 Haus F
13509 Berlin

b. E-mail

compliance@aroundtown.de

c. Telephone

Please refer to the Aroundtown Intranet for current telephone details.

d. Personal meeting

Group Compliance Officer, Room 4.20
Wittestraße 30, Haus F
13509 Berlin

e. BKMS System (please refer to section f)

f. External Reporting Channel

Additionally, the whistleblower has the opportunity to contact the external reporting office of the relevant country.

6. BKMS process

6.1. All potential whistleblowers can access the BKMS System either via a hyperlink on the company intranet or on the Aroundtown website. Under the link "Submit Report", they can submit so-called whistleblower reports. As soon as a report has been submitted, the BKMS System offers whistleblowers the possibility to set up a mailbox in order to enable an exchange with the user processing the report, if necessary, as part of the investigation of the whistleblowing. However, setting up a mailbox is voluntary.

6.2. All persons within the company who are responsible for processing reports receive special training on how to deal with reports or whistleblowers. Within the BKMS System, the administrators and users initially deal with the incoming reports.

The administrators and users are authorised to access reports within the BKMS System. Those individuals are part of the compliance, legal and HR departments and they are obliged to process and document incoming reports within the BKMS System and to communicate with whistleblowers, provided the whistleblower has set up a mailbox for this purpose.

6.3. All reports are handled and passed on exclusively in accordance with the "least privilege" and "need to know" approach. This means that only those persons come into contact with the report who need to do so for the further clarification of the report and that these persons only have access to such information of the report that is relevant for their task within the reporting process.

7. Launch of an investigation

7.1. The submitted report is first provided to a responsible user of the BKMS System or to a member of Group Compliance that will be responsible for handling the report ("**responsible person**"). If necessary, this person clarifies the facts in an initial dialogue with the whistleblower.

7.2. After evaluating all the factual information provided by the whistleblower, the responsible person assesses whether the report involves misconduct that is legally relevant to Aroundtown. Even if the report is assessed as misconduct that is not legally relevant, this does not mean that the report and the behaviour experienced are not significant. In this case, the responsible person will first discuss the outcome ("**repair and recovery**") in dialogue with the whistleblower.

7.3. If the responsible person comes to the conclusion that the report may involve misconduct that is legally relevant for Aroundtown, they will pass this on - anonymously if necessary - to the Chief Compliance Officer ("**CCO**"). The CCO then decides, in consultation with Legal and - if personnel matters are involved - also in consultation with HR, whether a further investigation of the facts ("**investigation**") is to be launched.

7.4. Legal's review competence within the initiation process is limited to making an initial - non-binding - assessment of the report. This is not a binding assessment of the legal situation; in particular, Legal will not examine the whistleblower's rights that may arise.

8. Information for whistleblowers

As far as the whistleblower can be contacted by Aroundtown, the whistleblower will receive an acknowledgement of receipt of the report within a maximum of 7 days. If requested by the whistleblower, Aroundtown will inform the whistleblower to the extent permitted by law and as far as possible about the ongoing process, the actions taken, the progress of the investigation and the outcome of the investigation. As far as possible, the whistleblower will be provided with feedback on the status of the investigation and / or any remedial action taken no later than three months from the date of acknowledgement of receipt of the report through the mailbox.

9. Confidentiality

Every person who, has in his/her possession the details of any whistleblower and the reported event, must maintain strict confidentiality at all times and, in particular, not disclose the identity of the whistleblower and all persons named in the report to anyone inside or outside the company, unless there is a legal obligation for disclosure. The users and administrators of the BKMS System and all persons responsible for the reporting channels will be obligated to confidentiality in a separate declaration.

10. Protection of whistleblowers against retaliation and/or discrimination

To conclude this policy once again and in all clarity:

10.1. No whistleblower who makes a report in good faith should be discriminated against and/or disadvantaged, ostracised, receive a negative performance review or similar, be warned, dismissed, suspended, transferred, demoted or similar because of their report.

10.2. Supervisors or employees who discriminate against a whistleblower in contravention of clause 10.1 of this policy must expect consequences under employment law for their part.

10.3. The protection of whistleblowers also applies if the content of a report should turn out to be unfounded or inaccurate, unless the whistleblower has deliberately made untruthful statements.

11. Final provisions

This policy is final for the whistleblower system and replaces all previous guidelines and/or policies issued in this regard.

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