

Policy Against Discrimination, Harassment, Bullying, Stalking, and Violence in the Workplace

Preamble

Aroundtown SA promotes equal cooperation among all employees at all functional levels. Particular emphasis is placed on fostering a culture of trustworthy collaboration and a respectful, appreciative interaction.

Aroundtown SA is fully committed to creating a work culture free from discrimination and harassment. Maintaining a safe and healthy work environment, where people are treated with dignity, decency, and respect according to the principles of equality, is an individual right that must be preserved.

Aroundtown SA recognizes its obligation to comply with the relevant legal provisions as well as internationally recognised human rights principles and standards, as set forth in the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights, and the UN Global Compact.

In particular, Aroundtown is committed to compliance with the standards of the International Labour Organization (ILO) regarding:

- Equal pay (No. 100),
- Discrimination in Employment and Occupation (No. 111),
- Convention on Violence and Harassment (No. 190), and
- UN Conventions on the Elimination of All Forms of Discrimination against Women (CEDAW).

The obligations to ensure equal treatment of all employees as stipulated in the respective local anti-discrimination laws are not exhaustive and do not replace further provisions aimed at protection against disadvantages and the promotion of equality.

Protection against discrimination and harassment is also enshrined in the Code of Conduct for Employees as well as the Code of Conduct for Business Partners, thereby underscoring the importance of this issue for Aroundtown SA.

1. Objectives

This policy ("Policy") is intended to minimise and prevent discrimination, harassment, (cyber) bullying, (cyber) stalking and violence at the workplace. It is intended to inform affected individuals about handling and defence options and to underscore Aroundtown SA's clear commitment to maintaining a work culture free of discrimination and harassment. The objective of this Policy is to prevent or eliminate disadvantages to employees on the following reasons:

- race or ethnic origin,¹
- gender,
- religion or ideology,
- disability,
- age or
- sexual identity.

¹ The wording 'on the grounds of race or ethnic origin' follows the European Racial Equality Directive (Directive 2000/43). However, it is explicitly stated that human 'races' do not exist and theories based on the existence of different 'races' are rejected. In this Directive, the term is used to ensure that the scope of protection of the Directive, as set out in the European Directive, is at least maintained.

2. Scope

This Policy applies worldwide to Aroundtown SA, its subsidiaries and its affiliated companies (as defined in Section 15 of the German Stock Corporation Act, AktG) as well as to all companies in which the group of companies holds an interest, insofar as they declare the Policy to be binding (hereinafter, all companies covered by the scope of application are referred to as 'Aroundtown' or 'Group'). This Policy applies to all personnel, including executives and apprentices, as well as Group's governing bodies, without exception, regardless of length of service or hierarchical level.

It also covers persons who are treated in the same way as employees, such as temporary workers.

The term "Employee" includes all genders. Wherever the masculine form is used in this document, this is only for the purpose of simplicity and better readability. All personal designations apply equally to all genders.

This Policy also applies to interactions between business partners and Aroundtown employees (e.g., contractors, vendors, suppliers, customers, and guests).

The scope of this Policy covers all aspects and the entire duration of the employment relationship, from the application and hiring process through to employment and working conditions, as well as career development (i.e. training or promotion) up to the end of the employment relationship.

When implementing this Policy – also in Aroundtown's international companies – the respective overriding national and supranational law and the respective cultural practices within this framework must always be observed. If there are more comprehensive or stricter legal requirements on the same matter in the country of the respective international company, the respective company will make arrangements to fulfil the legal requirements. Any necessary adjustments must be made in coordination with the Policy owner.

3. Definitions

- a) Direct discrimination occurs when an individual receives less favourable treatment than another individual in a comparable situation due to a reason mentioned in section 1. Direct discrimination based on gender also includes unfavorable treatment of a woman due to pregnancy and/or motherhood.
- b) Indirect discrimination occurs when seemingly neutral rules, criteria, or procedures disadvantage or could disadvantage individuals compared to others due to a reason mentioned in section 1, unless these rules, criteria, or procedures are objectively justified by a legitimate aim, and the means of achieving that aim are appropriate and necessary.
- c) Harassment is deemed to be discrimination when unwanted conduct in connection with any of the grounds referred to in section 1 takes place with the purpose or effect of violating the dignity of the person concerned and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Furthermore, this Policy defines harassment as including cases of (cyber) bullying and (cyber) stalking.
 - i. According to this Policy, (cyber) bullying is defined as continuous, consecutive, or overlapping hostile, harassing, or discriminatory behaviour at the (digital) workplace or study place between employees, that serves the purpose of hostility, harassment or discrimination, which, by its nature and course of events, is generally conducive to an overriding objective not covered by the legal system and, in any

case, in its entirety violates the general personal rights, honour, and/or health of the affected person and/or excludes them from the work environment.

- ii. (Cyber) stalking is defined as the willful, intentional, and repeated following, pursuing, and/or harassing of a specific person against their will.

d) Sexualised harassment is a form of discrimination if the purpose or effect of an unwanted sexualised act, including solicitation, unwanted sexually determined physical contact, suggestive remarks, as well as the unwanted display and/or visible placement of sexualised and pornographic representations, is intended to violate the dignity of the person concerned, in particular by creating an environment characterised by intimidation, hostility, degradation, humiliation, or insult.

e) Instructing someone to discriminate against a person for a reason mentioned in section 1 is considered as discrimination. Such instructions are particularly given when someone directs another person to behave in a way that discriminates or may discriminate against another individual for a reason mentioned in section 1.

4. Characteristics of Discrimination and Forms of Disadvantage

Disadvantages, insults, or harmful actions can manifest in various forms. Each of these forms can be unpleasant for the affected individual. However, not every conflict constitutes discrimination in the legal sense.

- a. Ban on (also indirect forms of) Disadvantaging and Harassment

Both direct and indirect discrimination on at least one of the grounds listed in section 1 are prohibited.

In addition to discrimination against employees, harassment - in particular sexual harassment - is also prohibited. Prohibited harassment can take many forms, including but not limited to:

- Making fun of someone or denigrating someone's reputation, in private and/or in public,
- Unwelcome innuendo, ridicule, teasing, gossip and/or pranks,
- Verbal abuse such as shouting, threatening, swearing or insults,
- (Cyber) bullying / (cyber) stalking,
- Refusal to communicate, exclusion of individuals or groups or their social isolation,
- Deliberately setting unrealistic goals and/or deadlines,
- Offensive gestures,
- Displaying and/or distributing racist material,
- Invading a person's privacy through harassment and/or spying,
- Tampering with a person's personal belongings and/or work equipment.

Sexual harassment has no gender or sexual orientation bias. Such incidents can be perpetrated by any gender against any gender. The key factor is not whether the perpetrator has sexual feelings for the recipient, but that the behaviour is sexual in nature and unwanted and/or offensive. While it is not feasible to provide an exhaustive list of all circumstances that could constitute sexual harassment, the following are examples of behaviors that, if unwelcome, may constitute sexual harassment depending on the circumstances.

- Sexual advances, whether or not they involve physical touching,
- Requests for sexual favors in exchange for actual or promised professional benefits, such as continued employment, positive evaluations, salary increases, promotions, or higher performance,
- Exercising or threatening reprisals after a negative response to sexual advances,
- Sexual jokes,

- Use of sexual terms, written or verbal references to sexual conduct, gossip about one's sex life, comments on an individual's body, and/or comments about an individual's sexual activities, deficiencies, and/or prowess,
- Use of sexually suggestive and/or obscene letters, notes, voice messages, emails, and/or invitations,
- Display of sexually suggestive objects, pictures, and/or cartoons,
- Staring, whistling, and/or touching the body, sexual gestures, and/or suggestive and/or offensive comments,
- Inquiries into one's sexual experiences,
- Discussion of one's sexual activities,
- Verbal abuse of a sexual nature, including the use of sexually degrading words to describe an individual.

Differential treatment is permissible if the differential treatment is objectively justified by a legitimate aim and the means to achieve that aim are proportionate. This is particularly applicable when existing disadvantages due to the aforementioned reasons are to be prevented or offset by suitable and appropriate measures.

(Cyber) bullying and (cyber) stalking are prohibited.

b. Personal Relationships in the Workplace

This Policy does not apply to private, consensual relationships between employees. However, such relationships may give rise to conflicts of interest. Further information on personal relationships can be found in the Conflict-of-Interest Policy.

5. Preventive Measures

Aroundtown is committed to implementing measures to prevent and eliminate discrimination and harassment based on the grounds outlined in Section 1. This protection encompasses both preventive and structural measures that are continuously adapted to prevent discrimination in relation to specific problem areas. In particular, the board/management and supervisors are committed to creating a harassment-free work environment through the implementation of preventive measures. These measures are designed to prevent harassment, discrimination, and violence, as well as (cyber) stalking or (cyber) mobbing in the workplace or in work-related spaces.

- Specific preventive measures include:
- Announcing this Policy to all employees and ensuring its permanent, easily accessible publication, especially on the intranet,
- Regularly informing employees about counseling and support services in cases of discrimination, harassment, (cyber) mobbing, and (cyber) stalking,
- Regular information sessions and appropriate sensitization and qualification measures for all employees,
- Regular mandatory online-based training for employees and supervisors,

Providing information resources for individuals with leadership, management, and training responsibilities, particularly in the form of training and further education opportunities, encouraging affected individuals not to tolerate discrimination, harassment, (cyber) mobbing, and (cyber) stalking, and to report incidents accordingly.

It is the responsibility of each manager to ensure that employees operate in a safe work environment. This primarily encompasses behavior that fosters respectful and non-discriminatory interactions and upholds the integrity of all employees. Managers are expected to take an active role in this regard, addressing any negative behaviour observed or perceived in a timely manner and ensuring that their teams are appropriately trained.

6. Measures to protect the persons concerned and sanctions

All employees have a right to respect and protection of their dignity. It is essential that we behave respectfully towards others. It is everyone's responsibility to treat others with respect.

If Aroundtown becomes aware of discriminatory behaviour by employees towards other employees and/or third parties in the course of their work for Aroundtown, Aroundtown is required to adopt suitable, necessary and appropriate measures to protect those affected from such discriminatory actions. Each Employee should be aware that such discriminatory behaviour against another employees and/or third parties can lead to measures under employment law, in particular a warning, reprimand, relocation or also termination of the employment contract.

Any employee who suspects a violation of this Policy and/or applicable laws should report the suspected violation as soon as possible. Complainants must not be discriminated against or harassed for utilizing the reporting option. The same protection applies to supporters and witnesses of the reporting person. Any related disadvantage constitutes a violation of this Policy. All reports will be handled confidentially and sensitively.

Additionally, depending on the circumstances of the case and considering the wishes, abilities, and qualifications of the alleged victim, it may be possible to offer a transfer to another position within the group, if organizationally feasible, and/or provide psychological counseling.

Employees are responsible, within their areas of responsibility and within the scope of their duty of care, for ensuring that discrimination, harassment, (cyber) bullying, and (cyber) stalking are prevented or eliminated and legally investigated. They can actively contribute to preventing discrimination and harassment by:

- Leading by example and respecting one another,
- Not participating in harassing and/or discriminatory behavior and actively opposing it,
- Making it clear when such behavior is unwelcome,
- Participating in company training sessions to promote a discrimination- and harassment-free work environment,
- Reporting any form of harassment or discrimination, whether observed or experienced firsthand, to Group Compliance, supervisors, the HR department, or through another channel provided in this Policy, or
- Contacting another internal trusted person.

7. Complaint office / Procedure

Employees who feel that they have been victims of violence, harassment and/or discrimination against on any of the grounds set out in this Policy are encouraged to report any incident immediately to the relevant complaints office.

The Group Compliance is the respective internal point of contact at Aroundtown for all fundamental questions on the topics of compliance and the reporting of violations.

Furthermore, it is important to keep any information or documentation that could prove the occurrence of the prohibited behaviour (e.g., emails, text messages, etc.).

More detailed information is also provided in the Diversity, Equality and Inclusion Policy (DEI) and applies in conjunction with this Policy.

The respective complaint will be reviewed by Aroundtown. In cases of discrimination, harassment, (cyber) bullying, and/or (cyber) stalking, the appropriate, necessary, and reasonable measures and/or sanctions must be taken by the competent bodies in each individual case. The circumstances of each case, including the protection needs of the affected individuals, will be taken into account.

Investigation Procedures: Aroundtown conducts objective and timely investigations and/or reviews when a case of discrimination, violence, or harassment is reported. Investigations must generally be conducted and/or monitored in accordance with the principles of this Policy and the Investigation Policy.

Collaboration: Whenever necessary, the affected employees are required to cooperate with the responsible authority in investigating complaints and/or incidents.

Confidentiality: All documents are to be treated as confidential as possible. However, there is no entitlement to anonymous treatment. The affected person will be informed about support options available through the Group Compliance departments.

The outcome of the process, as well as the measures and/or sanctions, will be communicated to the affected individuals.

Further information can be found in the Whistleblower Policy and the Code of Conduct.

8. Consequences of violating this Policy

If, based on a thorough investigation, it is determined that employees have engaged in behavior that constitutes harassment, violence, (cyber) bullying, (cyber) stalking, and/or discrimination, it is considered a violation of this Policy and can, subject to legal requirements, result in mandatory training up to employment-related consequences. The following measures and/or sanctions, in particular, may be considered:

- Mediation
- Training/Counseling or Coaching
- Official call
- Warning/reprimand
- Transfer/assignment of other tasks
- Termination of employment
- Criminal charges by Aroundtown

Any person who tolerates, participates in, approves, and/or conceals actions that violate the provisions of this Policy may also be subject to disciplinary action.

9. Contact Point

If employees believe that they have been or are being disadvantaged or (sexually) harassed, they are encouraged to file a complaint through the general reporting channels outlined in the Code of Conduct (see above). Alternatively, they may also lodge a complaint with the HR department.

The contact details are:

HR Department Wittestraße 30, Building H D-13509 Berlin hr@aroundtown.de	Group Compliance Wittestraße 30, Building F D-13509 Berlin Compliance@aroundtown.de	Whistleblower System BKMS (ENG) Home - BKMS System
---	--	--

Remedial measures must be proportionate to the damage incurred.

In some cases, Aroundtown is legally obligated to report violations to the relevant law enforcement authorities. Aroundtown will inform the relevant authorities in accordance with local laws and fully cooperate with them.

All employees are required to acknowledge receipt and understanding of this policy.

10. Validity and coming into force

This Policy has been approved by the Board of Directors and comes into force on 01.03.2025. It replaces all previous guidelines and/or directives issued in this context.

This Policy will be reviewed regularly, at least every two years, for its validity and amended if necessary.

Document details *	
Document Title	Policy Against Discrimination, Harassment, Bullying, Stalking, and Violence in the Workplace
Document Version	2.0
Responsibility for the document	Group Compliance; Human Resources
Approval date	26.02.2025
Approved by	Board of Directors

** All documents are subjected to the appropriate frequency of version control and reviews. Updates and changes are documented on this page transparently and comprehensibly at all times. Required definitions and responsibilities are indicated where appropriate.*