



# Code of Conduct



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## Dear employees,

As hosts, we enjoy the trust our guests place in us to accommodate them. In return, they expect us to provide our services with integrity. It is the responsibility of all of us to live up to this expectation. Furthermore, NOVUM Hospitality, especially as a family-run company, is committed to making the right decisions and acting honestly. This applies to us not only as hosts but also as colleagues, business partners and members of society.

NOVUM Hospitality's binding Code of Conduct provides us with reliable orientation and a basis for our daily actions and behaviour. It applies as a guideline for all areas throughout our entire organisation.

The principles outlined support us in keeping our behaviour in line with laws, regulations and internal guidelines. Through the defined scope for action, it gives us more security within NOVUM Hospitality for our own behavioural compass. Our focus is always on our obligation to offer our guests a pleasant, positive and familiar hotel experience.

Through integrity and reliability, we earn the trust of our guests, business partners and employees. We equate illegal, unethical or irresponsible actions with violations of the Code of Conduct. Anyone who violates the Code acts disloyally towards the company and damages the company's reputation. Violations can also lead to serious economic damage. We therefore ask you to ensure compliance with the Code of Conduct in your working environment.

By acting with integrity, we all take responsibility for our daily decisions and behaviour. Together, we make a significant contribution to sustainable corporate development, our personal development and, in a broader sense, to a sustainable world.

The Management Board

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# I. Personnel ethics

At NOVUM Hospitality, we offer a working environment that is both professional and safe, while at the same time fostering teamwork and trust in each other. Only through joint efforts and the contribution of the most diverse skills can innovative offers and solutions for our guests be found in the future. We give each other trust, respect, esteem and appreciation.

We promote open and honest communication across hierarchical levels, with different stakeholders and beyond national borders.

### Leadership culture

Our managers bear responsibility for their employees and act as role models. They distinguish themselves through exemplary personal behaviour, performance, openness and social competence. In their area of responsibility, managers ensure optimal working conditions and an appreciative working atmosphere. We cultivate an open error culture in which errors are understood as necessary elements of learning processes.

### Promotion of employees

At NOVUM Hospitality, we owe our success to the knowledge, experience and commitment of each and every employee. Our employees are our greatest asset. For this reason, we invest in the qualification and competence of our employees, among other things in the form of the NOVUM Hospitality School. We particularly encourage commitment, performance and the assumption of responsibility. The aim is to develop and recruit junior managers from within our own company.

### Bullying

We at NOVUM Hospitality strictly condemn any discriminatory and conflictual action and communication in the workplace that lasts over a longer period of time and is carried out with the aim of excluding a certain person through targeted attacks.

### Equal treatment and anti-discrimination

A culture of equal opportunities, tolerance and partnership is of utmost importance to us at NOVUM Hospitality. We treat all people equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or belief.

We at NOVUM Hospitality are responsible for creating an atmosphere that is free from discrimination and harassment. We uphold the rights of our fellow human beings and ensure that we treat each other with courtesy and professionalism.

We are proud of the diversity that our guests and employees bring to NOVUM Hospitality.

We are committed to upholding the principles of tolerance, equal opportunities and partnership. We base our behaviour on these fundamental principles. Anyone who feels discriminated against has the right to complain, which will not be interpreted to their disadvantage.

### Example situation

You receive several applications for your advertised job vacancy. Among the applications is a person who has recently moved to Germany and only speaks English.

### Compliant behaviour

The application must be treated in the same way as all other applications. It is important to check whether the job vacancy can also be filled using the English language and whether the German language is not a basic requirement for doing the job.

Our search for employees is always based on the qualifications, skills and experience of the applicants and on the fulfilment of the basic requirements for the position.





## II. Social responsibility

Respect for human rights and fundamental social standards are a basic principle of all human coexistence. Working conditions that violate such rights and standards contradict this principle. This applies to us at NOVUM Hospitality as well as externally in our cooperation with business partners. Within our sphere of responsibility and influence, we bear responsibility for ensuring that human rights and fundamental social standards are not violated, in particular:

1. The avoidance and safe control of dangers to people and nature is an essential component of responsible action. The safety of guests and employees is our top priority. Compliance with all safety regulations, regardless of whether they are prescribed by law, issued by the responsible authorities or regulated in company guidelines, is indispensable. Each individual is jointly responsible for safety in their working environment.
2. We at NOVUM Hospitality speak out against child labour and any form of forced labour. Human rights violations such as any form of modern slavery or the exploitation of children are not tolerated in our business areas or in our supply chains. We also ensure that our hotels are not used for human rights abuses such as human trafficking or sexual exploitation.
3. In the event of concerns about the condition or safety of guests or employees, we commit to immediately report them and notify supervisors.

At NOVUM Hospitality, we are involved in many social causes and support charitable organisations, foundations and projects. With the establishment of the Nader Etmenan Foundation, a charitable foundation was created whose assistance includes integration and diversity, protection and support as well as social commitment, with a special focus on supporting disadvantaged children.

### **Example situation**

You hear rumours that a supplier sourced by NOVUM Hospitality uses child labour.

### **Compliant behaviour**

While there is a presumption of innocence, the matter must be investigated.

We do not tolerate child labour, neither within our own business nor with our suppliers. If the suspicion is confirmed, the cooperation must be terminated. In the event of a possible suspicion, please contact: [compliance@novum-hospitality.com](mailto:compliance@novum-hospitality.com)





# III.

## Data privacy and discretion

It goes without saying that we protect the personal data of our guests and employees and respect national and international data protection regulations. Our security standards and our actions are aimed towards protecting personal data from access and unlawful use by unauthorised persons. Our business partners are also obliged to handle such data with care.

1. We undertake to treat all personal data with the utmost sensitivity and to protect it from misuse so that no one's right to privacy is impaired by the usage of this data.
2. We only use data for certain legitimate purposes specified at the time of collection.
3. We protect the right of everyone involved to information, blocking and deletion of their data.

### The handling of information and working documents

Our knowledge is our asset and the basis for our success. For this reason, confidential information is not to be disseminated within the company or to the public. We are extremely sensitive when exchanging confidential information with third parties. This applies to the handling of passwords, sensitive data and the protection of the same.

### Discretion with guests

Due to the special industry-specific proximity to our guests, discretion is an indispensable requirement when dealing with their personal information. We uphold the right to informational self-determination and respect the privacy of our guests

### Example situation 1

A spouse of a guest contacts the reservations department by telephone with a request for information about the stay of the other spouse, from whom we have not received express permission.

### Compliant behaviour

Guest data is particularly personal and sensitive, therefore the protection of guest data according to the Data Protection Act is indispensable. We are obliged not to provide any information unless we have the guest's express written permission. Not even if a family relationship is stated.

### Example situation 2

A hotel employee knows the name of a regular guest and calls them loudly through the lobby to greet them, which displeases the guest.

### Compliant behaviour

Greeting the guest loudly is a nice gesture. However, it is also indiscreet behaviour towards our guests. We are obliged to respect the privacy of our guests and to protect their right to informational self-determination. Accordingly, we always act discreetly when dealing with our guests. The loud calling of the name is to be refrained from.



# IV.

## Environmental protection and sustainability

We make our economic decisions with prudent sustainability and carry out business processes with the utmost care. At the same time, we are committed to complying with applicable environmental regulations, to preserving and protecting the environment and to reducing the environmental impact of our actions:

1. We reduce our energy and water consumption and promote this awareness also among our guests.
2. We are committed to reusing and recycling resources consumed through our business activities wherever practicable. NOVUM Hospitality will therefore focus on measures that save energy, avoid unnecessary waste and protect the environment.
3. We expect our suppliers and business partners to respect the environment in accordance with the relevant international legal standards

With regard to the environment, NOVUM Hospitality acts in such a way that the use of resources and any negative impact on the environment are kept as low as possible. In order to ensure this, we continuously evaluate all processes with regard to their factors influencing the environment and implement identified potential for improvement in practice.

### Example situation

In a hotel, motion detectors have been installed in the corridors that only switch on the light when someone enters the corridor. A hotel employee deactivates them so that the corridors are brightly lit at all times.

### Compliant behaviour

We do not put our personal feelings above the idea of environmental protection. We respect the given attitudes towards saving resources

# V.

## Compliance

All business activities by NOVUM Hospitality comply with applicable laws and regulations. This applies at local, national and international level. In some cases, stricter rules may be established internally, in which case they are considered additional rules. Internally established guidelines, principles and business rules are regarded as internal company standards according to which we undertake to act.

Therefore:

1. Violations of applicable laws may cause harm to our guests, business partners, competitors or others and are therefore in no way tolerable.
2. Activities which are obviously aimed at undermining laws or other regulations must not be considered or supported. Unlawful actions can lead to criminal prosecution and loss of reputation for NOVUM Hospitality as well as personal sanctions for the person carrying them out.

3. We are all obliged to comply with the established internal standards. These exist for topics related to hotel operations (e.g. SOPs Front Office) as well as for procedures in most headquarters functions (e.g. SOPs HR).

### Example situation

A hotel management decides to look for a new beverage supplier on its own and signs the contract without consultation. The company's internal standard for this process is disregarded.

### Compliant behaviour

In order not to violate existing framework agreements with their suppliers, the defined procurement procedures must be adhered to. This ensures that procurements can be made at special, negotiated conditions. Possible contractual penalties due to disregard of existing contracts can thus be avoided.



# VI.

## Fair and equitable competition

Fair competition is an essential part of responsible business. It benefits our guests and helps protect the reputation of NOVUM Hospitality and our brands. NOVUM Hospitality is fully committed to fair competition and complies with the laws against restraints of competition of all countries in which it operates.

Threats to fair competition arise, for example, from agreements between competitors on prices, territorial divisions or customer groups, as well as from the abuse of a dominant position.

Collusive behaviour, informal discussions or agreements that have as their object or effect the restriction of competition are also prohibited, in particular:

### Sharing inside information

In discussions with direct competitors, we do not share confidential information, e.g. about prices, capacity utilisation, construction projects, investment plans or relationships with guests and business partners, which has not already been publicly communicated.

### Agreements with competitors

We do not enter into any agreements with competitors, e.g. on non-competition, on pricing strategy or on the allocation of customers, territories or customer segments. Similarly, we refrain from informal discussions that have as their object or affect any of the above-mentioned restrictions of competition.

### Granting of advantages

In no case do we offer or grant unjustified advantages to third parties in connection with business activities. See also the chapter “Anti-corruption”.

### Example situation

There is only one other hotel in the immediate vicinity. Agreements are made under the table with the direct hotel competitor as to who is “allowed” to accept certain guest requests and who is not.

### Compliant behaviour

We ensure fair competition by not colluding with competitors. Healthy open competition is our goal.





## VII. Anti-Corruption

Our business relationships are based on integrity. We strictly comply with all applicable anti-corruption laws and regulations. Any violations may result in the invalidation of contracts, criminal sanctions and fines.

1. We do not abuse the trust and power entrusted to us to gain unfair advantage.
2. We reject and do not tolerate any form of corruption, bribery, theft, embezzlement, extortion or illegal payments.
3. We do not make illegal payments or grant other illegal advantages in order to influence decision-making processes.
4. We do not offer, give, solicit or accept bribes, illegal payments or kickbacks in connection with our business activities.

Gifts and gratuities could be misunderstood and lead to undue influence. To avoid this, we do not accept gifts or entertainment that could raise doubts about NOVUM Hospitality's personal integrity or independence. Specifically, this applies to the following:

### Monetary gifts and discounts

We may not solicit or accept monetary gifts or entertainment offers from business partners or competitors that are available only to NOVUM Hospitality. In addition to monetary gifts, non-standard discounts also count as inadmissible conditions.

### Gifts in kind

We may only accept gifts in kind up to the limit of what is customary in business. The limit is determined by whether the gift in kind clearly excludes the possibility of influencing a decision-making process. The mere impression that a decision could have been influenced by the gift must be strictly avoided. In cases of doubt and in the case of high-value gifts (from EUR 35), prior notification must be made via the intranet site of the compliance department and approval must be awaited.

### Invitations

We may only accept invitations, e.g. for hospitality, to events and trips, up to the limit of what is customary in business, if these serve legitimate business purposes and take place within the scope of ordinary cooperation. A representative of the host company must also be present at the event. Invitations also require prior notification via the compliance intranet site and approval.

### Services

We may neither request nor accept services from (prospective) business partners or competitors that are free of charge or not remunerated at market rates. This applies to both our business and our private environment.

### Donations

Donations should never be made if they could be seen as unduly influencing business activities. The management of NOVUM Hospitality decides on charitable donations. However, the company does not make party donations, whether in the form of cash or other contributions. This applies in all countries of the world.

### Example situation

You work in the sales department and prepare an offer for a customer. You notice that competitors are also making offers, probably at better conditions. It occurs to you to invite the contact person of the customer's purchasing department and their families to a sports event (incl. covering the costs for travel and accommodation) in order to give them a personal reason to prefer our offer. In doing so, you act with the best intentions for the company.

### Compliant behaviour

Our business relationships are governed solely by integrity. We refrain from influencing decision-making processes in any way. They submit the best calculated offer possible in their area of responsibility.





## VIII.

### Transparent reporting

We at NOVUM Hospitality are committed to honest and transparent reporting. In doing so, we ensure that all published data, information and documents prepared or signed off by us are accurate. To ensure this, we are committed to accurate, complete, loyal and timely reporting.

This affects a wide variety of internal and external documents, such as the annual report, expense claims or reports.

The exact specifications for this are:

1. We are committed to complying with applicable laws and external reporting requirements and to presenting a true and fair view of our financial condition.
2. At no time do we make false or misleading statements or representations in reports or publications. Falsifying reports and records or distorting facts may constitute fraud.
3. We explicitly promote the communication of opportunities and risks within the company in accordance with the company's internal guidelines. All employees are encouraged to report opportunities and risks identified in their work environment to their supervisor or to compliance.

#### **Example situation**

In order to stand out even better in a competitive comparison (whether internally or externally oriented), you are asked to present special company key figures differently.

#### **Compliant behaviour**

You do not make misleading or false statements and invoke the presentation of a true reflection of the financial situation.





## IX. Conflicts of interest

NOVUM Hospitality stands for compliance with the highest ethical standards. It is therefore our duty to avoid conflicts of interest between private interests (directly as well as indirectly or through related persons and/or companies) and the interests of NOVUM Hospitality.

In our dealings with existing or potential customers, business partners, contractors and competitors, we act in the best interests of NOVUM Hospitality and exclude any personal advantage.

The following are various manifestations of conflicts of interest.

1. Situations must not knowingly arise in which personal or family interests could conflict with the interests of NOVUM Hospitality. Employment with NOVUM Hospitality must not be misused to obtain unjustified personal benefits or advantages for related persons.
2. Further professional activities outside NOVUM Hospitality may also lead to conflicts of interest, which is why further activities must always be coordinated with supervisors.
3. Other examples of potential conflicts of interest include, but are not limited to, private exploitation of Company business relationships, opportunities, property or labour. If a potential conflict of interest is identified, details of it must be disclosed to supervisors and the individual concerned must withdraw from any related decision-making process.

### **Example situation**

A hotel management has various offers for a maintenance contract for a technical system of the hotel to be forwarded to the supervisor. One of them was submitted by a relative of the management. In order to make this appear to be the best, the management only submits the offer of the relative and an inferior company.

### **Compliant behaviour**

We treat all offers equally and consider the economic aspects of the company. In doing so, we never put our personal interest above the advantage of the company. This is how we ensure that the offer that is most advantageous for NOVUM Hospitality can be accepted.



# X.

## Corporate resources

All employees of NOVUM Hospitality are jointly responsible for the protection of the tangible and intangible assets of the company within their field of activity.

Tangible assets include all items such as buildings, computers and any form of documentation. Intangible assets include, for example, guest data, internal company standards or design drafts.

The following specific regulations apply to these areas:

1. We are obliged to maintain confidentiality about all internal company matters that have not been expressly released to the public by the responsible bodies.
2. It is not permitted to pass on confidential internal information - such as business strategies, business secrets or the contents of internal reporting - to unauthorised persons within or outside the company.
3. If, for operational reasons, confidential information is to be disclosed to third parties, permission must be obtained from immediate supervisors.
4. We may only use office facilities, hotels or other company property for non-operational purposes with express permission.

### Example situation 1

An employee uses internal event facilities for a private party without officially requesting and booking them for financial compensation.

### Compliant behaviour

We use material resources of the company for non-operational purposes only after an official release. To this end, we speak with the responsible decision-maker.

### Example situation 2

An employee from the headquarters privately shares stories from everyday working life with their friends. In addition to amusing office anecdotes, internal company strategies for the expansion of NOVUM Hospitality are also shared.

### Compliant behaviour

We are careful not to share internal corporate information outside the company. In this way, we protect intangible resources from misuse. This refers to particularly sensitive and confidential information that could, for example, give the competition an advantage.

## Practical implementation

Anyone who violates the Code of Conduct acts disloyally towards the company and damages the company's reputation. Each and every one of us personally ensures compliance with the Code of Conduct in the working environment. In practical terms, this means:

1. The Code of Conduct of NOVUM Hospitality is publicly accessible to every employee on the intranet.
2. In addition to their role model function, all managers have the task of carrying the Code of Conduct into our company and monitoring compliance. As part of their management activities, all managers are obliged to ensure that all employees in their respective areas of responsibility understand, internalise and apply the rules of the Code. The Code of Conduct is binding throughout the organisation, for all areas and employees.
3. In order to comply with the anti-corruption principle, all employees of NOVUM Hospitality are obliged to submit gifts in kind, invitations or other benefits which fall under the obligation to register and which they wish to accept, via a form for verification. Details can be found in the SOP "Authorization for acceptance of Benefits".
4. We encourage all employees to report concerns in good faith, in confidence and without fear of retaliation. We will not tolerate retaliation, discrimination or disciplinary action against anyone who, in good faith, raises reasonable concerns about attempted, actual or suspected misconduct or violation of any provision of the Code of Conduct.
5. Violations of the NOVUM Hospitality Code of Conduct must be reported to the Compliance Department. This can be done anonymously or directly (see reporting options). We treat all submissions as strictly confidential and take every report seriously. We will protect the identity of those who wish to remain anonymous at all times.
6. An unjustified violation of the principles laid down in the Code of Conduct of NOVUM Hospitality may lead to consequences under labour law, up to and including dismissal.





# Compliance reporting options

Anonymous: <https://novum-hospitality.trusty.report>


Other contact options:

Telephone: +49 40/ 600 808 - 383

Email: [compliance@novum-hospitality.com](mailto:compliance@novum-hospitality.com)

Postal address:

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