

# Speak Up Procedure

## introduction

citizenM wants to do right things for its guests, employees, business partners and the community. Behaving appropriately and ethically in all of our dealings and under all circumstances is an essential part of this. The citizenM Rules provide guidance and defines desired attitudes and appropriate behavior within citizenM. The simple message is that we want to ensure that all citizenM employees make their decisions and perform their work carefully and with the highest integrity, in line with the best interests of citizenM.

We can all take great pride in the many wonderful things that citizenM stands for, and as long as everyone remains committed to the values that make us special, and abide to the rules citizenM will never be just another company. That is why we encourage our employees and partners who have concerns about a (suspected) violation of the citizenM Rules to speak up and share their concerns with us.

We want to reassure you that any employee and stakeholder should feel comfortable reporting (suspected) misconduct without fear of punishment or unfair treatment. We assure that all reports are handled confidentially and will be investigated promptly.

## raising concerns

Employees and stakeholders are encouraged to raise a concern if they believe an issue is in violation of the law or not entirely in line with citizenM's values or the citizenM Rules. You are encouraged to raise your concern first with your line manager. This is the fastest way to clear up any misunderstandings and to ensure an open working environment. If you feel uncomfortable doing so, if it is impossible to do so or if you are dissatisfied with the outcome, concerns can be raised with citizenM's local counsellors (in particular in case of personal complaints, complaints about the manager's style of leadership or way of doing business) or citizenM's confidential advisor. The confidential advisor can be contacted at [confidentialadvisor@citizenm.com](mailto:confidentialadvisor@citizenm.com).

You may at all times consult the confidential advisor confidentially to ask for advice about your concerns in respect of (suspected) misconduct. No formal report will be made if only a question is asked.

## follow up

Upon receipt of a (suspected) misconduct report the confidential advisor will immediately confirm receipt of such report to the employee in writing or per email. Any report brought in good faith will receive a fair and comprehensive investigation. The confidential advisor will, where possible, keep the employee informed about the investigation and of the outcome and any recommendations of the investigation on a regular basis. The employee will, where possible, be given the opportunity to respond to the outcome and recommendations. Line managers, HR and local counsellors will inform the confidential advisor on a confidential basis of any reported (suspected) misconduct (other than personal grievances). The confidential advisor will inform citizenM's board of directors on a confidential basis of any reports of (suspected) misconduct.

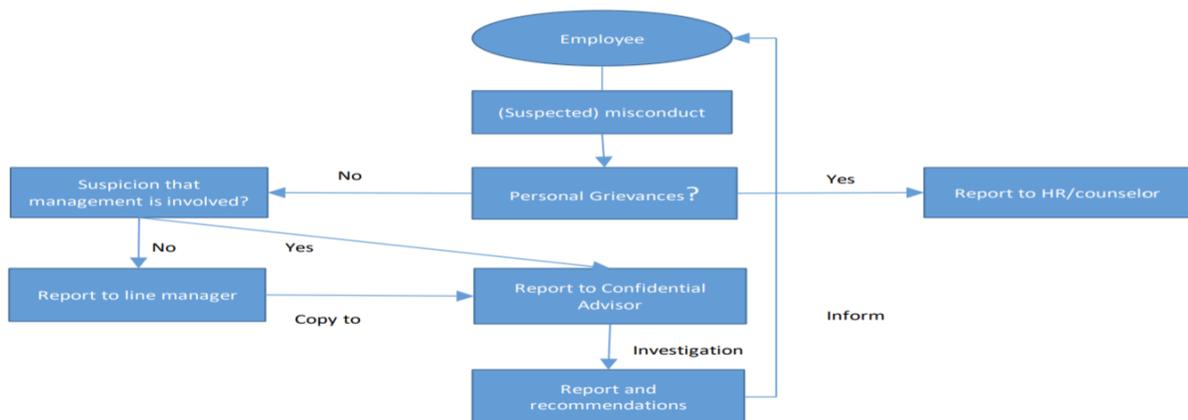
## no retaliation

An employee who reports (suspected) misconduct in good faith will not suffer any detriment as a consequence of his or her report. In case you have misjudged the situation or behavior this will not be held against you. Retaliation against a reporting employee will not be tolerated. However, making a report in bad faith will be subject to disciplinary action, which may include termination of employment.

## privacy

We are committed to protecting the privacy of everyone involved in the investigation of (suspected) misconduct. Any personal data obtained as part of any investigation will only be used for the purposes described in this document and will only be given to those persons who need to know. The only exceptions are if we are under a legal or regulatory obligation to disclose the information or you filed a report in bad faith. In both these cases, disclosure of any personal data will only take place to the extent necessary to comply with applicable law or take the appropriate measures in respect of any bad faith reporting.

## reporting decision flow



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