

# 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 define desired attitudes and appropriate behavior within citizenM. The simple message is that we want to ensure 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. As long as everyone remains committed to the values that make us special, and abide by the Rules, citizenM will never be just another company.

That is why we encourage our employees and stakeholders <sup>1</sup> who have concerns about a (suspected) violation of the citizenM Rules to speak up and share their concerns with us.

We want to emphasize that any employee and stakeholder should feel confident reporting (suspected) misconduct without fear of punishment, negative consequence or unfair treatment. Retaliation against employees or other stakeholders reporting (suspected) misconduct in good faith will not be tolerated. We assure that all reports are handled confidentially and will be investigated promptly.

## Raising concerns

Employees and stakeholders are encouraged to raise concerns about suspected violations, that is: any suspected violation of the law, citizenM's values or the citizenM Rules. Employees are encouraged to raise their concerns with their line manager, either orally or in writing. 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, you can raise your concerns (even orally) with citizenM's trusted persons. Our trusted persons are there to discuss your concerns in confidence and advise on any next steps. They do not participate in any investigation as to protect the confidentiality of their conversations with you, as well as your identity. Please click [here](#) for the contact details of our trusted persons.

Employees and other stakeholders can also report their concerns to citizenM's confidential advisor. The confidential advisor can be contacted at [confidentialadvisor@citizenM.com](mailto:confidentialadvisor@citizenM.com).

You can also report (suspected) violations using our external, independent Speak Up Platform Speeki. Speeki is available 24/7 365 days a year to raise concerns confidentially and anonymously and in your own language. Concerns can be reported via the [Speeki Webportal](#), by downloading the Speeki app in the app store or via the QR code at the end of this policy.

All reports received via Speeki are routed back to citizenM for further handling to the confidential advisor, who is independent and neutral in such cases and appointed to receive and coordinate speak up reports. He will register all speak up reports and ensure that no person has access unless in accordance with this policy. All reports of (suspected) violations must be submitted within one year from the start of the suspicion. Certain issues present risks to employees and to the future of citizenM which are so high that you cannot allow these to be ignored. Every employee must report any situation or behavior which:

- can endanger the health or safety of any person or product; or
- seems to be a violation of a law for which a person could end up in prison or for which citizenM could end up paying a substantial fine (such as fraud, theft, corruption, anti-competitive behavior and similar issues) or suffer major reputation damage.

Where you suspect circumstances as mentioned above, you must submit a report immediately.

At all times, the trusted persons and the confidential advisor may be consulted confidentially to ask for advice about your concerns in respect of (suspected) violations. No formal report will be made if only a question is asked.

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<sup>1</sup> Stakeholders include any person with a business relationship with citizenM, such as seconded and temporary personnel, interns, job applicants, former employees, business partners, customers and (potential) suppliers.

## Follow up and protection of your identity

All reporting will be registered and treated confidentially and, if permitted by the laws of your country, can be done anonymously. You are encouraged to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously. Therefore, we will always ask you if investigators may communicate with you, either directly or via a trusted person. A trusted person can anonymize your report and act as an intermediary between you and the company; in such cases your report is being 'anonymized'. You may also use a temporary email account to communicate with us or the investigators. Reported (suspected) violations will be investigated in accordance with our [Investigation Protocol](#).

Your report (without indicating your identity) will only be shared with others on a need-to-know basis, and only outside this group if we are required to do so by law. We are obliged to inform, at the appropriate time, the person that is the subject of your concern during the investigation, but your identity will not be disclosed.

Any report brought in good faith will receive a fair and impartial investigation. Where your identity is known, you will receive a confirmation of your report within 7 days. Where possible, you will be kept informed about the investigation and of the outcome and any recommendations of the investigation on a regular basis but in any case within three months of the date of filing the report.

Never investigate (suspected) violations yourself. We guarantee that no disciplinary measures or other steps will be taken against you if your genuine concern later turns out to be mistaken or misguided.

All involved in reporting and investigations are under obligation to keep such information strictly confidential.

## No retaliation

An employee who reports a (suspected) violation in good faith will not suffer any detriment as a consequence of his or her report or from cooperating in any investigation. In case you have misjudged the situation or behavior this will not be held against you. Retaliation against a reporting employee and threats or attempts to retaliate will not be tolerated. Please report any negative consequences to the confidential advisor or via Speeki. We impose sanctions for any form of retaliatory behavior. However, making a report in bad faith will be subject to disciplinary action, which may include termination of employment.

## Privacy

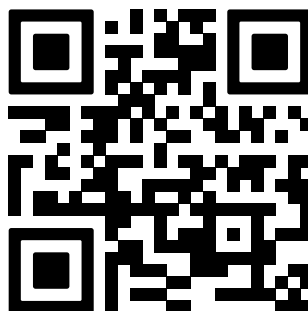
We are committed to protecting the privacy of everyone involved in the investigation of (suspected) violations and in line with our privacy policy. Any personal data obtained as part of any investigation will only be used for the purposes described in this document and will only be given to those persons 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.

## External reporting

In some cases and provided that a number of conditions are met you can report (suspected) violations of major integrity incidents externally and will be equally protected. These conditions may vary from country to country. Your nationally appointed whistleblowing authority can provide you with more information about this as well as about your option to seek external publicity directly.

## April 2023

Scan QR CODE to report a (suspected) violation of our citizenM Rules



## Speak up policy: how to file a report

Do you want to raise a concern or do you need confidential advice? Speak to your direct manager, HR, our trusted persons, the confidential advisor, or use Speeki (citizenm.portal.speeki.com)

