

Introduction

Our citizenM values and unique culture are worth protecting. It's the bright, buzzing spark that makes us unique. A shield against all that is beige and boring,

Add to that our honest and genuine human values, The will to do right for the people who matter to us: Our guests, employees, partners and local communities.

But we know that unless we offer definition and clarification, All these grand statements are just squiggles of ink. So here is a document to guide, instruct and make clear. We're sure you'll agree to agree on our citizenM rules, We look forward to continuing doing great things together.

citizenM rules

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. This citizenM rule document provides 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.

The citizenM rules apply to all (temporary) employees and consultants working for citizenM ("hereinafter" employee"). We expect them to abide by the rules and to hold each other accountable for compliance with this citizenM rule book. Non compliance may lead to disciplinary measures including, but not limited to, dismissal and administrative sanctions.

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 by the rules, citizenM will never be just another company.

citizenM says:

be a nice person, that's why we hired you your responsibility: do right, it would break our heart if you do not treat people well

Behavior employees

citizenM expects its employees to work with care and respect for others. Satisfied guests are the people who can affirm citizenM's success. Therefore, it is the responsibility of every employee to have a passionate attitude and to provide unexpected and surpassing services to our guests at all times. Fundamental for our employees and their relationship with colleagues, suppliers, lenders, and other third business partners, is that we treat each other

with respect and inform each other in a clear, honest, and straightforward way. citizenM empowers its employees and trusts that they will act responsibly and avoid any behavior that may harm the reputation of citizenM.

Harassment at work

Harassment is not the same as a joke or teasing. Harassment is any verbal or physical conduct that denigrates, shows hostility, really damages, or takes advantage of an individual because of their race, color, age, sex, sexual orientation, disability, or any other characteristic protected by law. citizenM does not allow harassment at work. Anyone who experiences harassment at work can contact Human Resources or contact the trusted advisors at our various locations for counseling. Support of the victim helps as well, namely non-verbally showing disapproval of the behavior and not laughing when others make fun of the victim. In this manner, everyone can contribute, where necessary, to an inspiring and pleasant environment, and ban harassment.

Sexual intimidation

citizenM does not accept sexual intimidation. A respectful working environment is essential for the wellbeing of our employees. Sexual harassment is unwelcome sexual attention that makes an individual feel offended, humiliated ,and/or intimidated. This can be both verbal (gestures) and physical (touching). The person to whom it happens determines what is unwanted or not. It is difficult to define this exactly. The limits between 'just friendly' and 'going too far' are different for each individual. Anyone who is bothered by or concerned about either unwanted behavior or sexual intimidation can contact Human Resources for counseling or contact the trusted advisors at our various locations.

Fair dealing

citizenM takes great pride in providing an inspiring and fun work environment. Therefore, employees must at all times try their best to treat fellow employees, guests, and business partners fairly and with respect. Actions that may lead taking unfair advantage of someone may include manipulation, concealment, abuse of privileged information, or any other unfair dealing practice violating our culture.

Drugs and alcohol

The use of any illegal drugs on citizenM locations is strictly forbidden. Illegal drugs include all drugs except prescribed and over-the-counter drugs that have been legally obtained and used for the purpose for which they were intended. citizenM expects you to report to work in a condition to perform your duties, free from intoxication due to drugs or alcohol. citizenM may check employees on the use of drugs and alcohol at work and will promptly investigate any alleged drug and alcohol abuse, such behavior will be deemed as gross misconduct and dealt with accordingly in line with local legislation and disciplinary practices.

citizenM says:

think what you say before you say what you think your responsibility: communicate in a clear and honest way

Social media and e-mail

Social media and e-mail are a convenient, fast, and effective way to communicate with other employees, our guests, and business partners. However, they must be used appropriately. Irresponsible, careless, or insensitive statements may be taken out of context and used against employees and citizenM. citizenM has adopted PR & external communications. All employees of citizenM are expected to review and follow the guidelines when communicating via social media channels and email. Keep in mind that citizenM's reputation can be harmed when using social media or email for personal purposes. We therefore expect you to respect and apply our PR and Communication guidelines both during and after business.

Media

citizenM public communications should contain full, fair, accurate, timely, and understandable disclosure. All employees of citizenM are expected to review and follow the guidelines as described in the PR & external communications. Information concerning citizenM towards the public is through limited channels to avoid inappropriate publicity. We have designated our CMO as our official spokespeople for all inquiries or calls from the press. All external communications, such as interviews, presentations at seminars, or other venues must be approved by our CEO.

Financial reporting

citizenM must comply with generally accepted accounting rules. All business transactions shall be accurately and completely recorded in accordance with citizenM's accounting principles and applicable laws and regulations. citizenM expects its employees to adhere to these accounting rules. All records and supporting documents will accurately describe and reflect the nature of the underlying transactions. No false or misleading entries may be made in its books or records.

Freedom to speak up

citizenM fosters an accessible management style based on real caring, careful listening, and open, two-way communication. All employees are encouraged to approach and communicate with managers or Human Resources to discuss concerns, the working environment, and business related matters so they can be addressed. citizenM is committed to inform and involve all its employees in planning and running its business.

citizenM says:

don't be a trust-breaker or a stuff-taker your responsibility: be careful with citizenM assets

Confidentiality

All business related information relating to citizenM businesses, properties, shareholders, financial affairs and all other affairs that belong to citizenM must be kept confidential, both while employed, as well as after termination of employment. Every employee is required

to sign a confidentiality agreement as a condition of employment. This agreement spells out all pertinent information regarding citizenM ownership of materials and other intellectual property and ongoing confidentiality obligations to citizenM. Please do the right thing by not violating the trust citizenM placed in you.

Information security

Technology provides a crucial foundation for citizenM's guest journey. Our guests and our employees are dependent on our technology and the data managed by it. Also for our support office, technology has increasingly become an essential component of the service provided to our hotel teams.

It is critically important that all citizenM employees and all third parties, understand the importance of safeguarding citizenM's business information. Under our corporate governance practice, citizenM is required to protect from accidental or deliberate disclosure or loss: information about our guests, employees, strategy and finance. This information may be stored and processed by citizenM internally or by partners managed by us under contract. At all times, however, citizenM remains responsible for this data, wherever it is stored, and is committed to protect the privacy and cyber security of guests and employees, as well as the corresponding data assets entrusted to us. citizenM will not tolerate any misuse of data entrusted to us and all employees are required to comply with the citizenM book of cyber safety.

Company equipment

citizenM equipment (e.g. a mobile phone, company car, and computer) is for doing citizenM business, but may be used for incidental and limited personal purposes. Each employee has the obligation to care for this equipment and use it responsibly. If citizenM equipment is used at home or off site, precautions should be taken to protect it from theft or damage.

Entertainment & credit cards

citizenM reimburses employees for necessary business travel and reasonable entertainment expenses. Expenses must qualify as 'reasonable use' but if there is any uncertainty whether a certain expense is reasonable, employees are welcome to ask their manager or finance department for advice and a pre-approval of the expense(s). Expense reports should be processed in a timely manner. Employees that are authorized to use a business credit card must use that card solely for business purposes. citizenM expects its employees to act in a responsible manner with citizenM funds. All entertainment transactions requiring reimbursement or payment by citizenM must contain documentation that fully and accurately describes the nature of the transaction.

Political contributions

citizenM funds or resources may not be used to support any political candidate or political party anywhere in the world. citizenM neither supports political parties nor contributes to the funds of groups whose activities are focused on promoting party interests. Employees are therefore not allowed to use any citizenM funds for sponsorships or political contributions of any kind. Personal contributions are allowed, but any representation of such contribution on

citizenM's behalf is not permitted.

Theft

It is the employee's responsibility to protect citizenM assets to their best ability, and ensure their efficient use. Theft, carelessness, and waste have a direct effect on our profitability. If citizenM merchandise and property is used, please make an effort to ensure that citizenM has received proper value in return. Remember that employees are trusted members of the citizenM family – please do not violate that trust. Any suspected fraud or theft should be immediately reported to a manager. Concern can be raised through one of the options set out in the citizenM speak up policy.

citizenM says:

let's do things right

(y)our integrity: act responsibly and in compliance with applicable laws and regulations

Compliance with laws

citizenM and its employees perform their work with integrity and comply with all laws and regulations that apply to its business. This citizenM rule book does not cover all of citizenM's internal policies that apply to its employees. When conducting citizenM business, employees are expected to abide by governing laws and regulations. While this rule book addresses a wide variety of topics, good judgment and common sense should always be used, as it cannot, and does not, address every possible situation. If there are questions on specific situations, laws, or regulations, employees must seek guidance and contact citizenM's General Counsel for advice.

Dealing with third parties

citizenM only does business with business partners who support our values, our social, and environmental standards. We expect our business partners to abide by the principles laid down in this citizenM rule book. citizenM will not enter a relationship with persons or business partners that engage in illegal or unethical activities. Key to our integrity is performing a risk-based, third party due diligence check on our (potential) business partners and professional advisors. Employees shall report any reasonable doubt about the integrity of a (potential) business partner or legitimacy of the (contemplated) transaction to the responsible senior management, while also informing citizenM's General Counsel.

Anti-bribery

citizenM will not tolerate any act of bribery or corruption from any of its employees or business partners. A bribe is defined as giving anything of value, directly or indirectly, to influence an act or someone's decision, or persuading a person to use their influence. There shall be no distinction between a person who works for a (foreign) government or one who is active in the private sector. citizenM will not tolerate bribery. All employees are required to comply with the 'citizenM Anti-bribery & corruption policy'.

Competition and antitrust

citizenM will compete for business and expects its employees to compete lawfully and ethically. Employees may not exchange information with competitors regarding costs, pricing, construction and design, terms of conditions of service offerings, choice of suppliers, future locations, and market share.

Human rights

citizenM supports and respects human rights and strives to ensure that its activities do not cause a violation of human rights. citizenM will promote economic and social justice for its employees.

Equal opportunities

citizenM is committed to an empowering and attractive working environment for its employees. In this respect, it is our responsibility to recruit, hire, and promote employees on the basis of suitability for the job. Our employees are recruited, selected, and promoted on the basis of objective and non-discriminatory criteria. No discrimination of any kind will be tolerated (for example, discrimination based on race, ethnicity, sex, sexual orientation, age, religion or beliefs, disability or marriage and civil partnership). citizenM managers possess the flexibility to deal with existing differences in individual quality, personal ambition, national culture, and organizational interest. It's inspiring and challenging to manage such differences.

Conflicts of interest

It is critically important in maintaining our integrity that nobody at citizenM, whether an employee or consultant, be subject to influences, interests, or relationships that conflict with citizenM's best interests. A conflict of interest exists when private interests interfere in any way or compete with citizenM's interests. Each employee shall report potential conflicts of interest to the responsible senior management while also informing citizenM's General Counsel.

Child labour

citizenM will not recruit or employ child labour in any form. The minimum age for employment is determined by the national legislation and the legal age for compulsory education in any given country where citizenM operates. Employees younger than 18 years of age will not be employed at night and will not be required to carry out heavy or risky tasks nor work in areas of risk, without full supervision, in line with relevant risk assessments. Young workers will not carry out any task that's prohibited by national legislation due to their age.

Health and safety

citizenM takes full responsibility and does what is in its power to ensure safe and healthy working conditions, in order to prevent harm to, and promote the health of employees.

Health and safety rules and regulations apply at all our locations. citizenM obliges their employees to comply with the company health and safety norms as communicated to them from time to time. Employees shall bring to the management's attention any concerns so that measures can be taken to prevent accidents and injuries to employees. citizenM will ensure availability of skilled first aiders in each location. Proper fire fighting equipment and fully equipped first aid kits are provided at strategic posts.

Environment

citizenM created a unique cultural and brand footprint. However citizenM is committed to limit our footprint on the environment. We care about today's and future generations and we will all take great pride in taking all possible measures to ensure our activities are conducted in a way that minimizes the impact on the local environment.

Reporting Violations of the citizenM rules

All violations or suspected violations of the citizenM rules should be promptly reported to a manager, department manager, human resources or the legal director. Concerns can be raised through one of the options set out in the citizenM speak up policy.



Disciplinary Action

citizenM will take appropriate action against any employee whose actions are found to violate the citizenM rules. Disciplinary actions may include the termination of employment. Where citizenM has suffered a loss, it may pursue its remedies against the individuals or entities responsible.