

ALERT POLICY



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
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Appendix 1: List of phone numbers to contact the alert platform



FOREWORD

At B&B HOTELS, we act with the highest ethical standards as part of our goal to set an example and make lasting commitments.

These commitments are explained in our Code of Ethics.

Indeed, Ethics are the responsibility of each employee of the B&B Hotels Group, i.e. any employee, employee of the subsidiaries/entities of the B&B Hotels Group, whatever their status (employees under permanent or fixed-term contracts, temporary workers, trainees, etc.), which also includes management.

Ethics are reflected in the relationships between employees, but also in their relationships with third parties (such as business partners, mandate managers, franchisees, suppliers, service providers, consultants etc.).

It is important for all our employees and stakeholders to behave in an exemplary manner and in a way that reflects our core values among which Integrity.

We encourage our employees and all our stakeholders to report any concerns they may have about Compliance and Ethics with these commitments in order for us to take any necessary corrective action.

The B&B Group Alert Policy enables employees and stakeholders to make a whistleblowing report, in accordance with applicable legal provisions, and in particular with the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, commonly referred to as “whistleblowers”, transposed in countries.

For this purpose, it is essential that B&B HOTELS employees and stakeholders have access to a secure and efficient internal reporting channel that provides them with all the necessary confidentiality guarantees.

These guarantees allow them to highlight any potential breaches of our ethical rules, as well as any threat or harm to public interest.

The B&B Group Alert Policy is applicable to all subsidiaries, including B&B Hotels Hungary Kft. B&B Hotels Hungary adopted this Hungarian version of the Group Policy taking into account the specific legal requirements of Hungary, especially Act XXV of 2023 on Complaints and Public Interest Disclosures, and on the Rules of Whistleblowing Notifications (the "Complaints Act").

This version of the Group Alert Policy is applicable only to the B&B Hotels Hungary Kft.

B&B HOTELS Group Compliance Department, together with the local Compliance managers and local CEOs of Hungary are the main point of contact with regards to the management of reports and the conduct of Ethical investigations.

- In this document, B&B HOTELS refers to the Hungarian subsidiary, B&B Hotels Hungary Kft, while B&B HOTELS Group refers to all the subsidiaries and legal



entities directly and/or indirectly controlled by Casper TopCo, head of B&B HOTELS Group.

I. PART I: GENERAL PROVISIONS

1.1 Conditions of admissibility of a whistleblowing report

1.1.1 People who can make a report

For the purpose of this policy, a reporter is any individual authorized to submit a whistleblowing report. This may include:

- A B&B HOTELS employee who is currently working for B&B HOTELS, regardless of the nature of their employment contract;
- A B&B HOTELS Group partner: franchisee or mandate manager;
- Any Franchisee or mandate manager supplier and/or any of franchisee/mandate manager's supplier's staff;
- Occasional partners, including temporary staff, interns and volunteers, as well as anyone working under the supervision and management of B&B HOTELS contractors or subcontractors;
- B&B HOTELS external partners (suppliers, subcontractors, service providers, associations, etc.);
- A person who wishes to establish a legal (work-related or contractual) relationship with B&B HOTELS and for whom the procedure for the establishment of such a relationship has been initiated;
- A person who has ceased to have a legal (work-related or contractual) relationship with B&B HOTELS.

1.1.2 Conditions regarding the reporter protection

This policy provides reporters with the means to make a whistleblowing report via the internal channels implemented by this policy, as well as confidentiality guarantees, provided that they meet the following conditions:

- A whistleblowing report must be made without any direct financial counterpart;
- A whistleblowing report shall be made by an individual who has had personal knowledge of the facts or to whom the facts have been reported in the course of their professional activity;

- A whistleblowing report must be made in good faith:
 - A whistleblowing report is considered to be made «in good faith» when its reporter provides information which they believe is comprehensive, fair and accurate, allowing them to reasonably believe in the truthfulness of the information given, even if it later appears that they were mistaken.
- If, after having made a whistleblowing report, a reporter realises that they were mistaken, they must immediately inform the person to whom they made their whistleblowing report.
- Reporter protection is extended to:
 - Facilitators (i.e. defined as being any individual or private, non-profit legal entity that helps the reporter make a whistleblowing report);
 - Individuals associated with the reporter (i.e. anyone who could, in the course of their professional activities, suffer retaliation from the employer) and;
 - Legal entities the reporter works for or with which they have a professional relationship or which they control.

1.1.3 Facts that may be reported

A whistleblowing report is a disclosure of:

- Suspected, actual or proven breaches (or attempts to conceal such breaches) of the B&B HOTELS Group's Code of Ethics, any Group compliance policy or procedure;
- A criminal activity (i.e. a crime or an offence);
-
- A situation that may pose a threat to or harm public interest;
- A violation or risk of violation of human rights and fundamental freedoms;
- A breach or risk of breach to people's health and safety or the environment;
- The deliberate concealment of any of the above matters;
- Retaliation for making a whistleblowing report or being involved in the handling of it.

A whistleblowing report must concern facts related to B&B HOTELS Group activities, which have already occurred or are likely to occur.

Concerns not covered by the above definitions shall not be considered as whistleblowing reports under this policy. These concerns can be shared through the reporter's usual contacts (i.e. B&B HOTELS management, Human Resources, etc.).

The main issues that may be reported as per the present policy include notably:

- ***Human rights and fundamental freedoms:***

For example: Child labour, forced labour (including modern slavery), sexual harassment (including sexist comments), bullying and harassment, discrimination (including racist or homophobic comments), human rights breaches within our supply chain, etc.

- **Health, safety/ security of individuals and Environment:**

For example: non-compliance with designated measures for promoting a healthy workplace both in HQ and in hotels (i.e including internal requirements for handling hazardous/sensitive products for the cleaning staff), the management of epidemics situations etc.

- **Economic and financial interests:**

For example: private or public corruption, influence peddling, internal or external fraud, conflicts of interest, procurement fraud, breaches of antitrust rules or international economic sanctions, money laundering, embezzlement, disclosure of sensitive information etc.

- **The Group's policies and Code of Ethics:**

For example: any allegation concerning behavior that does not comply with B&B HOTELS Group ethical commitments, likely to affect its stakeholders or B&B HOTELS Group's reputation.

1.2 Making a whistleblowing report

1.2.1 Channels at disposal

Anyone who decide to use the alert platform to make a report, may:

- **Whether connect to the secure platform**, outsourced and dedicated to the B&B Hotels Group: www.bb-alert.me ("Platform") and then click on the flag/language of their country at the top right;
- Or **submit their report by telephone**, for Hungary: +36 21 211 1482

The alert system, whatever the means use stated above, **is secure and operates in collaboration with two partners:**

- **Signalement.net** is the platform provider;
- And **ADIT** who acts as an external referent and trusted third party, in addition to the Group Compliance referent, embodied by the Group Chief Compliance Officer. The ADIT is thus able to assist the B&B Hotels Group at different stages of the reporting process.

ADIT is subject to confidentiality obligation and guarantees data protection (encrypted and password-protected alert process).

ADIT is in charge of the following tasks during the process:

- Filtering and processing of reports (*to be noted that ADIT team speaks and writes down all languages of the B&B Hotels Group, including Hungarian*);
- Analysis of their admissibility;

- Interacting with the reporter, the Group Chief Compliance Officer and Local Compliance Officers, acting as local referents and other contributors defined page 11 art 2.3;
- Preparing of a pre-qualification report.

In accordance with legal requirements, these internal channels guarantee that **the identity of the reporter, the people referred to in a whistleblowing report and any third party mentioned in a whistleblowing report are kept strictly confidential**, as well as any other information collected by recipients of a whistleblowing report.

The system presented by this policy is complementary to reporting channels that exist outside the company. **Although B&B HOTELS strongly recommends using this system, the reporter will not be subject to any retaliatory action if they choose to make a whistleblowing report through an external channel** (page 8).

If in doubt about the procedure to follow to make their whistleblowing report, the employee can seek advice from their line manager or the Human Resources Department.

The secure website: www.bb-alert.me allows anonymous reports but does not encourage them.

Indeed, **if a report is made anonymously, the possibility of it being handled under this system will particularly depend on whether sufficiently detailed and factual information has been provided by the reporter. Also under Hungarian law, the investigation may be lawfully rejected if the reporter is unidentifiable.**

However, the reporter is generally advised to make their identity known when making a report. The reporter's identity will be kept confidential in accordance with this procedure and will not be disclosed to the reported or accused person, unless otherwise required by law or if the reporter provides its explicit consent.

If a whistleblowing report is deemed not admissible the reporter shall be informed thereof in writing and of the reasons why the entity considers that their report does not comply with these conditions. Wherever possible, they are advised on other means for expressing their concern.

Within the same period, they will also be provided with information on the measures considered or taken to assess the accuracy of the allegations.

1.2.2 Other possible channels: external report

To the relevant Authorities: As a general rule, reporters are encouraged to use internal reporting channels in a first instance in order for situations to be remedied within the

Group as quickly and efficiently as possible, while providing the reporter with enhanced confidentiality guarantees.

However, the reporter may report to a judicial or administrative authority, professional body or any other relevant institution or body.

In Hungary, the reporter may report to the administrative bodies, including:

- the Directorate General for the Auditing of European Funds;
- the Gazdasági Versenyhivatal (Hungarian Competition Authority);
- the Integritás Hatóság (Integrity Authority);
- the Közbeszerzési Hatóság (Procurement Authority);
- the Magyar Energetikai és Közmű-szabályozási Hivatal (Hungarian Energy and Public Utility Regulatory Office);
- the Magyar Nemzeti Bank (National Bank of Hungary);
- the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information);
- the Nemzeti Média- és Hírközlési Hatóság (National Media and Infocommunications Authority);
- the Országos Atomenergia Hivatal (Hungarian Atomic Energy Authority); and
- the Szabályozott Tevékenységek Felügyeleti Hatósága (Supervisory Authority of Controlled Activities).

The detailed rules of the operation of external reporting systems are found in Sections 32-40 of the Compliant Act.

Public disclosure (Press; forum; Blog...)

As a last resort and under certain assumptions, the reporter may make their whistleblowing report publicly. These assumptions are as follows:

- If after making an external whistleblowing report to a relevant authority, whether preceded by an internal whistleblowing report or not, no action specified in the Act XXV of 2023 has been taken **within a 6-month period**;
- If the reporter had reasonable grounds to believe that the circumstance reported constitutes a manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage;
- If the reporter had reasonable grounds to believe that if reporting through an external whistleblowing system under 1.2.2, due to the particular circumstances of the case, there exist an obvious possibility that
 - detrimental measures may be taken against the reporter, or
 - the breach will not be effectively addressed.

Under these assumptions, the reporter does not incur any liability with respect to the whistleblowing report or public disclosure, provided that they can justify that

they had reasonable grounds for believing that there was serious or imminent danger or a risk of irreversible damage.

II. PART II: PROCEDURE FOR HANDLING REPORTS

2.1 Information to be provided in support of a whistleblowing report

The information provided in connection with a whistleblowing report must be factual and directly related to the subject matter of said report.

In their report, the reporter describes, as objectively as possible and in detail, the facts needed to understand the report. It is recommended that reporters specify the following information:

- i. When and where each reported fact took place;
- ii. How they became aware of it (directly or indirectly) and whether this knowledge is personal or not;
- iii. Whether they have already told other people about the content of their report;
- iv. Whether steps have already been taken to remedy the situation;
- v. The identity and positions of the people implicated;
- vi. Whether there were witnesses to the reported facts (identities, positions, facts concerned, roles of the identified persons);
- vii. Wherever possible, they should provide any information or documents which might substantiate their report. If they are not sure that a particular fact is true, they should specify that it is a presumed fact;
- viii. How they can be contacted;
- ix. Whether, to the best of their knowledge, at the time of reporting and while the report is being handled, legal or similar proceedings (i.e., arbitration, mediation, injunction, etc.) are impending or ongoing. In this case, the whistleblowing report is usually not admissible and its handling is normally suspended or stopped. B&B HOTELS does, however, reserve the right to investigate it and take corrective action if necessary.

Important to know:

When the information reported has not been obtained in the course of their professional activity, reporters must have had personal knowledge of it.

However, reporters must not back up their report with information or documents, regardless of their form or means:

- Obtained by committing a criminal offence (for example: theft of documents, illegal recordings, etc.)
- Covered by national defence secrecy, secrecy of investigations, secrecy of pre-trial investigations, secrecy of judicial deliberations, medical confidentiality or legal privilege unless the information belongs to the reporter (for example: their exchanges with their lawyer or their personal medical information).

2.2 Admissibility assessment of a whistleblowing report

- When making a whistleblowing report via the secure website or by phone, an acknowledgement of receipt is sent by the authorised person to the reporter **within 7 days**;
- When a whistleblowing report is made via the secure website or by phone, its admissibility is usually assessed by the ADIT, trusted third party, in addition to the Group Compliance referent, embodied by the Group Chief Compliance Officer and the Local Compliance Officer;
- On a case-by-case basis, they may share the admissibility assessment to another designated representative;
- Assessing the admissibility of a whistleblowing report involves checking whether it meets the definition of a whistleblowing report under this policy and whether sufficiently detailed and factual information has been provided to enable it to be properly handled;
- If necessary, additional information may be requested from the reporter in order to assess its admissibility;
- **If a whistleblowing report is not admissible, the reporter shall be informed thereof within a maximum of 30 days from the receipt of said report.** The reporter shall also be informed of the follow-up to their whistleblowing report.
- A whistleblowing report may be considered not admissible if
 - the report was made by an unidentified reporter,
 - the report was not made by the person entitled to do so,
 - the report is a duplicate submission from the same reporter, containing identical content as that of the previous report, or
 - the harm to the public interest or to an overriding private interest would not

- be proportionate to the restriction of the rights of the person concerned resulting from the investigation of the report.
- the reporter does not provide sufficiently detailed and factual information to enable it to be handled.
- If a whistleblowing report is not admissible, the entity shall close the case. The reporter shall be informed thereof in writing and of the reasons why the entity considers the whistleblowing report not to be admissible.
- Wherever possible, reporters are advised on other means for expressing their concern.

2.3 People likely to be involved in support of a whistleblowing report

The reporter

The reporter is the individual who reports information about breaches they have personally observed or that relates to information obtained in the course of their professional activities.

As a reminder, **reporters must act in good faith and without any direct financial counterpart.**

Facilitators

- A «facilitator» is any individual or private, non-profit legal entity that helps a reporter make a Speak Up report in accordance to the law.

Witnesses and experts

- B&B HOTELS Group Employees or other B&B HOTELS Group stakeholders may be asked to contribute as:

A witness:

- Identified as part of the investigation, they are assumed to have at least partial knowledge of the reported situations and are likely to be able to provide information on the circumstances surrounding the facts;

An expert:

- Internal or external technicians and/or specialists chosen for their specific knowledge in a certain area and who are responsible for making analyses, observations or assessments of facts or providing any useful information for handling whistleblowing reports.

Their task is to provide the most objective and detailed explanation of the reported facts as well as of the circumstances likely to surround these facts.

The accused person:

- The accused person is the individual named by the reporter as having committed an ethical breach or violation. A person may also be accused during the course of the investigation when information collected and not identified in the initial whistleblowing report suggests that it has committed, concealed or participated in a breach or violation.

By actively participating in interviews, the accused person can explain their version of the facts regarding the information in a whistleblowing report and, where applicable, information subsequently identified when the whistleblowing report is being handled.

Accused persons shall be informed within a reasonable period of time of the nature of the whistleblowing report concerning them, the collection of their personal data. They are usually informed after the admissibility of the whistleblowing report has been assessed.

Other stakeholders involved in an investigation

The investigation team: in light of the information provided and the circumstances surrounding the facts, B&B HOTELS shall decide how to conduct the investigation.

- It may be conducted internally by the team in charge of or its designated representatives.
- It may also be externalized to a third party appointed for this purpose (i.e. external service provider, such as law firm or Forensic practice) or to a joint team.
- In the latter cases, the Group Compliance Officer will be appointed to supervise the investigation and handle its follow-up.

The members of the investigation team shall, by virtue of their position or status, have sufficient expertise, authority and means to carry out their tasks.

They shall carry out their tasks in an independent and impartial manner and shall be bound by the utmost confidentiality regarding the details of the investigation and the identity of the people involved in the investigation.

2.4 Steps following the admissibility assessment of a whistleblowing report: the investigation process

Aim of the investigation: analyse and verify the truthfulness of the allegations made in a whistleblowing report.

- The investigation may include a documentation, accounting or electronic review, or formal interviews with employees and/or stakeholders whose testimony is relevant



for the purpose of the investigation.

- These interviews are normally documented in minutes. A copy of the minutes is sent following the interview to the person interviewed in order to confirm the accuracy of the transcription of the exchanges or produce corrections or additional information, if necessary.
- As part of the investigation, B&B HOTELS may, in compliance with the applicable legal requirements, have access to employees' electronic data, such as emails, data stored on the Group's IT infrastructure, in a telephone or a work computer, etc. This analysis is carried out in accordance with B&B HOTELS Group policies.
- These analyses are carried out in an impartial and neutral manner, taking into consideration the details allowing to assess the truthfulness of the facts, for the benefit of both the accused person and the reporter, whoever is involved and whatever the hierarchical level of the persons involved.
- Investigation methods must never allow for information to be collected by using methods which are unlawful, unfair or disproportionately violate the rights of the people involved, as well as individual and collective freedoms.
- When the investigation is conducted by a law firm, local legal privilege applies only in the relationship between the law firm and the parties involved. It is possible that the persons interviewed may not take advantage of this privilege. When allowed by local law, B&B HOTELS may use any information or statement collected as part of the investigation, and in particular the information collected during the interviews conducted.
- As a general rule, an investigation report is written at the end of the verifications made by the investigation team and uploaded into the alert platform.
- The purpose of the investigation report is to substantiate the facts in a factual report that objectively confirms or denies the allegations made in a whistleblowing report.
- Once finalized, the investigation report is forwarded to the relevant internal contacts in order to decide on a potential remediation plan to be monitored.
- The investigation is closed following submission of the investigation report. The group Compliance Officer together with ADIT may also close the investigation when the allegations are unsubstantiated or when a whistleblowing report has become irrelevant.
- A whistleblowing report will be investigated within a maximum of thirty days of

receipt. The thirty-day deadline may be extended if justified. In this case, the reporter will be informed of the expected date of the investigation and the reasons for the extension. The time limit for investigating the report and informing the reporter of the outcome of the investigation may not exceed three months in the case of an extension.

2.4.1 The internal procedure for managing a whistleblowing report

- After the alert platform has received the whistleblowing report and the whistleblowing report was found admissible the whistleblowing report will be sent to the “Whistleblowing Committee” composed by: the Legal & General Affairs Director, the CEO and the HR & Quality Director.
- If the whistleblowing report concerns any member of the Whistleblowing Committee, or if any member of the Whistleblowing Committee sees a conflict of interest therein, he/she should refrain from participating in the evaluation process of the whistleblowing report in question.
- In the case from the preceding paragraph, it will then be the duty of the Legal & General Affairs Director, as corporate compliance officer, to circulate the whistleblowing report to the Chief Compliance Officer, Internal Audit Officer, and Risk Officer.
- The next step will be aimed to verifying the truth of the facts stated in the whistleblowing report, whereby this step will be coordinated by the Legal & General Affairs Director, who will arrange meetings for the necessary preliminary activity in this respect.
- Depending on the findings of the investigation, as described in more detail in point 2.5 below, a decision will be taken, e.g., to dismiss the whistleblowing report as not relevant or to take the most appropriate action.
- Whatever decision is reached after the investigation process, it will be communicated to the Chief Compliance Officer, Internal Audit Officer and Risk Officer together with the proposed action, if any, and its expected timing).
- In the case of an action plan, it will be confirmed that each step has been reached according to the expected progress.
- A record of the whistleblowing reports received, and the actions taken, if any, will be kept in a special register (excel file or dedicated platform).

2.5 Follow up of an admissible report

Information on the follow up

- As a general rule, the reporter shall receive information in writing on the investigation's findings and measures considered or taken to assess the accuracy of an allegation, within the time limit for the investigation.
- The reporter shall receive information in writing on the investigation or non-investigation of the report, along with an explanation for the decision of non-investigation, within the time limit for the investigation.
- Some information relating to a whistleblowing report must also be shared with the accused person in order to give them the means to explain the facts in question.
- The reporter and the accused person shall be informed of the end of the investigation and the conclusions on the main allegations addressed in a whistleblowing report.
- As a general rule, key witnesses are informed of the end of the investigation.

Remedial measures

- After a whistleblowing report has been handled, discussions are held between the group Compliance Officer, ADIT, the contributors in countries, and the line manager(s) of the accused person to share the conclusions of the investigation.
- In case the allegations are (partly) substantiated; the competent stakeholders may define a remediation plan to be implemented.
- Human Resources and/or the line manager(s) of the accused person in each country are responsible for the implementation of the remediation plan.
- Such remediation plan can be individual or collective. It may involve mediation, training programmes, coaching or the implementation of disciplinary sanctions, which may go as far as dismissal when needed.

Prevention of retaliation

- B&B HOTELS does not tolerate any retaliation measure against a person who has made a whistleblowing report or who has been involved in the handling of a whistleblowing report made in the requested and legal conditions (art 1.1 page 5).
- «**Retaliation**» refers to all unjustified and/or harmful actions (such as intimidation, suspension, dismissal, damage to reputation, reduction in pay, or disciplinary action, action on social networks...) taken against a reporter, facilitator, witness or any person connected to a reporter, as a result of a whistleblowing report made in the requested and legal conditions.
- Any reporter or anyone who has provided information in connection with the handling

of a whistleblowing report who considers to be subject to an act of retaliation, including threats of retaliation and retaliation attempts, may report it to the group Compliance Officer or to local compliance managers.

- In order to verify the absence of retaliation, monitoring can be carried out at the benefit of the reporter, its facilitators, witnesses or other people involved in the handling of a whistleblowing report, up to one year following the closure of the investigation.

Sanctions for whistleblowing reports made in bad faith or for impeding the handling of a whistleblowing report made in good faith

- In order to ensure that the whistleblowing policy is effective and that the people involved in the context of this policy are protected under this policy, sanctions up to and including the termination of the contractual relationship, and even legal proceedings, may be initiated in the event of:
 - A whistleblowing report made maliciously or in bad faith or with the intention of obtaining direct financial compensation;
 - Obstruction or attempted obstruction, through action or inaction, of a whistleblowing or the handling of a whistleblowing report;
 - A breach of the strict confidentiality obligation related to receiving or handling a whistleblowing report;
 - Retaliatory acts or threats, or any form of abusive action against the reporter, facilitators and/or third parties associated with the reporter.

2.6 Rights and obligations

2.6.1 Respect for data integrity and confidentiality

Respect for data integrity and confidentiality:

This policy guarantees the integrity of the information collected in a whistleblowing report. Anyone implicated with the handling of an ethics investigation is bound by a strict confidentiality obligation designed to protect the identity of those involved in the investigation, whether as a witness, the reporter or the accused person.

They must not reveal the information to which they have had access (i.e., questions, answers, issues covered, people involved, etc.). This requirement makes it possible to safeguard the reputation of all those involved and contributes to the proper conduct of the investigation by avoiding any influence.

Moreover, staff members who are not authorised to have knowledge of any such information

are strictly prohibited from accessing it.

Information allowing the reporter to be identified can only be disclosed with the reporter's consent. However, such restriction does not apply to those in charge of handling whistleblowing reports or remediation plans at the end of the investigation.

Furthermore, information allowing the reporter to be identified may be disclosed to the relevant authorities, should B&B HOTELS be required to report or have a legitimate interest in reporting such facts. The reporter shall then be informed thereof, unless such notification would compromise the ongoing proceedings.

2.6.2 Cooperation

Cooperation:

The reporter, person(s) implicated, witness(es), expert(s) and other stakeholders must fully and completely cooperate and provide, upon first request, without delay and without restriction, all facts, information and documents required, whatever their form or medium, to those in charge of handling a whistleblowing report.

Such cooperation also involves the above-mentioned people's effective attendance to interviews.

2.6.3 Respect of data privacy obligations

Respect of data privacy obligations:

The information collected and processed in connection with the investigations may include personal data (see part 2.7).

2.6.4 The right to be informed

The right to be informed:

As a general rule, any person accused in a whistleblowing report is informed that an investigation or analysis is conducted.

Such information is only provided after the admissibility assessment of a whistleblowing report or may be delayed if individuals or information relevant to the conduct of the ongoing investigation or analysis need to be protected.

2.6.5 Respect of neutrality

Respect of neutrality:

Any accused person must be heard in a fair manner as part of the handling of a whistleblowing report. Accused persons may ask for witnesses to be interviewed and may

produce any documentation they consider to be relevant to the handling of the ethics investigation.

The Group Compliance Officer or its designated representatives shall independently determine the relevance of the information provided and the follow-up actions that should be given to it.

2.7 Data protection guarantees

2.7.1 Data Controller

CASPER BIDCO, as the holding company of the B&B Hotels Group, is a Data Controller, responsible for collecting and processing the personal data of the B&B HOTELS professional alert system.

In this respect, CASPER BIDCO is required to ensure compliance with the principles of transparency and fairness with regard to persons whose data may be processed.

To do so, CASPER BIDCO complies with regard to the EU and national law relating to the processing of personal data intended for the implementation of the B&B HOTELS professional alert system. This implies informing the persons concerned individually and collectively, according to the methods described below.

CASPER BIDCO reminds that only the data necessary for the pursuit of the purposes of the processing relating to the B&B HOTELS professional alert system are actually collected and processed.

CASPER BIDCO ensures that only relevant and necessary information with regard to the purposes of the processing is collected and/or kept in the B&B HOTELS professional alert system. In particular, this concerns the following categories:

- Alert (facts reported) ;
- Identity, functions and coordinates of :
 - The sender of the alert ;
 - Persons subject to the alert ;
 - Persons involved, consulted or heard in the collection or handling of the alert ;
 - Facilitators and people in contact with the sender of the alert ;
- Information gathered to verify the facts reported ;
- Audit reports ;
- Follow-up to the alert.

CASPER BIDCO ensures the necessity and relevance of the personal data it uses and also, throughout the life of the processing, the quality of the data it processes. It is required to check that the data is accurate and updated if necessary.

Data may be collected, processed by or transferred to other subsidiaries/entities of the B&B Hotels group, for example the subsidiary/entity where the internal employee is located, the external stakeholder or any other stakeholder.

In this case, these subsidiaries/entities also act as joint Data Controllers. All subsidiaries/entities of the B&B Hotels group will process personal data for the purposes described in this policy.

For further information on the use of personal data by other subsidiaries/entities for the purposes of this policy, please refer to the personal data policy or declaration of the subsidiary/entity concerned.

Persons whose personal data is collected and processed in this way by CASPER BIDCO may contact the following department for further information:

- by e-mail to the following address: support@signalement.net

Signalement.net will process your requests for correction or deletion and any request for personal data.

Where appropriate, Signalement.net will forward your requests to the relevant B&B entities.

2.7.2 Objectives of the processing (purposes)

Data is processed in order to:

- Collect and process alerts or warn of a breach of a specific rule;
- Carry out the necessary checks, investigations and analyses;
- Define the action to be taken on the alert;
- Ensure the protection of data subjects;
- Exercise or defend legal rights.

The legal basis for data processing is the fulfilment of a legal obligation according to Article 6(1)(c) of the GDPR. The basis for this legal obligation is Directive 2019/1937 and Chapter V, Section II of the Complaints Act.

Following the conclusion of the investigative phase, the legal basis for data processing is legitimate interests according to Article 6(1)(f) of the GDPR. After the maximum duration of 3 months for the investigative phase has ended, we will continue to store the data in a restricted manner within the 5-year civil statute of limitations period. We will only use the data in case of a potential complaint (e.g., to the relevant authority), official proceedings, or judicial remedies, for purposes such as substantiating compliance, enabling the evidence process, establishing the facts accurately, and making lawful decisions – all in the interest of legitimate interests.

2.7.3 Identification of the people concerned, recipients of the processing

Are considered as "**persons potentially concerned**" by the B&B HOTELS professional alert system, all persons who are likely to make a report or be the subject of an alert, and in particular:

- the reporting person,
- the person whose conduct or omission gave rise to the report,
- the person who may have material information on the subject matter of the report.

Their personal data will be processed to the extent absolutely necessary for the investigation of the report solely for the purpose of investigating the report and for remedying or eliminating the conduct that is the subject of the report, and may be transmitted to the external organization involved in the investigation of the report.

The provision of personal data is not mandatory, but if such data is essential for the investigation, the investigation of the report may fail.

The internal whistleblowing system is operated in such a way that the personal data of the reporting person who discloses their identity and of the person concerned cannot be disclosed to anyone other than the authorised persons. The persons investigating the report will, pending the conclusion of the investigation or the initiation of formal prosecution as a result of the investigation, share information about the content of the report and the person concerned, in addition to informing the person concerned, with other departments or employees of the controller to the extent strictly necessary for the conduct of the investigation.

Where the effective conduct of the investigation requires the involvement of a group department or employee, personal data processed under the internal whistleblowing system may only be transferred to such person or department if the person concerned has given their prior consent.

As a general rule, the controller does not transfer data to a third country or international organisation outside the European Union or the contracting states of the European Union and the European Economic Area. Such transfers may take place in respect of data processed under the internal whistleblowing system only in exceptional cases, subject to a legal undertaking by the recipient of the transfer to comply with the rules on whistleblowing set out in the Complaints Act and subject to the provisions on the protection of personal data.

If it becomes apparent that the reporting person has communicated false data or information in bad faith and

- there are indications that a criminal or administrative offence has been committed, personal data must be handed over to the authority or person responsible for the procedure,
- there are reasonable grounds for believing that he or she has caused unlawful damage or other legal harm to another person, his or her personal data must be disclosed at the request of the body or person entitled to initiate or conduct the proceedings.

The data processor of the controller is the hosting service provider who contributes to the storage of the electronic data. The controller uses the services of Signalement.net (published by the company VALEUR & CONFORMITE, registered office: 10 RUE DE PENTHIEVRE 75008 PARIS 8; website: <https://besignal.com/>) and ADIT (registered office: [*]; website: [*]) as data processor for electronic filing; [*] (registered office: [*]; company registration number: [*]; website: [*]) as data processor for telephone communication. The hosting service provider of the controller is [*] (registered office: [*]; company registration number: [*]; electronic delivery address: [*]).

2.7.4 Rights (access; object; rectification and deletion)

CASPER BIDCO reminds that data subjects have the following rights, which they can exercise under the conditions set out in the GDPR:

- The right to **object to the** processing of their data, subject to the conditions for exercising this right in application of the provisions of Article 21 of the GDPR;
- Rights of **access, rectification and deletion of** data concerning them;

- Right to **limit** processing. For example, if the person disputes the accuracy of his/her data, he/she may request that B&B HOTELS temporarily freeze the processing of his/her data, while it carries out the necessary verifications.

Right of access

Any person whose personal data is or has been processed in the context of a whistleblowing procedure (whistleblower, presumed victims of the facts, persons targeted by the whistleblowing procedure, witnesses and persons heard during the investigation, facilitators, persons protected by ricochet, etc.), has the right to access it in accordance with the provisions of art. 15 of the GDPR.

The exercise of this right must not infringe the rights and freedoms of others, including business secrecy or intellectual property, in particular copyright protecting the software. However, this limitation may not result in depriving the data subject of access to all the information referred to in article 15.1 of the GDPR;

This limitation is specific to the rules relating to the protection of personal data and does not prevent the application, where applicable, of the rules of procedural law and fundamental freedoms (and in particular the adversarial principle).

Under the Complaints Act, in exercising the right to information and access, the personal data of the reporting person as data subject may not be disclosed to the person requesting the information.

Right to object

In accordance with Article 21 of the GDPR, the right to object may not be exercised in respect of processing necessary for compliance with a legal obligation to which the controller is subject.

In the case of persons whose data is mentioned in the alert or appears during its investigation, the right to object may be exercised, but CASPER BIDCO, the data controller, points out that it may refuse to do so if:

- There are compelling legitimate grounds which override the interests and rights of the data subject, or;
- Processing is necessary for the establishment, exercise or defence of legal claims.

By their very nature, the facts likely to be the subject of an alert are linked to the establishment, exercise and defence of rights (in particular those of the victims or those presumed to be responsible for the facts reported, or even those of the organisation, if its civil or criminal liability may be engaged, or if the alert was not made in good faith but was intended to harm the smooth running of the organisation).

Under these conditions, it is CASPER BIDCO's responsibility to examine each request for opposition, whatever the capacity of the person who intends to avail himself of it (the author of the alert, the person targeted, the persons having been contacted within the framework of the checks, the protected persons by ricochet, etc.) by taking account of these criteria.

Right of rectification and deletion

The right of rectification provided for in Article 16 of the GDPR must be assessed in the light of the purpose of the processing.

In the case of the B&B HOTELS professional whistleblowing system, it must not allow the retroactive modification of the elements contained in the alert or collected during its investigation. Its exercise, when permitted, must not result in the impossibility of reconstructing the chronology of any modifications to important elements of the investigation.

Data subjects are therefore informed that this right may only be exercised to rectify factual data, the accuracy of which can be verified by the data controller on the basis of documentary evidence, without deleting or replacing the data initially collected, even if incorrect.

The right to erasure is exercised under the conditions set out in Article 17 of the GDPR.

The right to submit a complaint with a supervisory authority

If the data subject considers that the processing of personal data concerning him or her infringes the provisions of the GDPR or the data protection legislation in force, he or she may submit a complaint with the supervisory authority competent in the Member State of his or her habitual residence, place of work or place of the alleged infringement, in Hungary with the National Authority for Data Protection and Freedom of Information.

Contact details of the National Authority for Data Protection and Freedom of Information:

- postal address: 1363 Budapest, Pf. 9.
- address: 1055 Budapest, Falk Miksa utca 9-11.
- phone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail: ugyfelszolgalat@naih.hu
- web: www.naih.hu

Irrespective of the right to submit a complaint, the data subject may also take legal action against the unlawful processing of their personal data or the infringement of their rights relating to the right to information self-determination. In Hungary, legal proceedings may be brought before the competent court of the place of residence or domicile of the data subject, or, on the basis of the seat of the controller, before the Capital Regional Court (seat: 1055 Budapest, Markó utca 27; postal address: 1363 Budapest, Pf. 16.)

2.7.5 Data retention period

With regard to the purposes:

Data relating to an alert may be kept in the active database until a **final decision has been made on the action** to be taken, i.e. for a maximum of three months.

Once the final decision has been made on the action to be taken in response to the alert, the data may be kept in the form of **an interim archive for** *"the time strictly proportionate to the processing and protection of its authors, the persons it concerns and the third parties it mentions, taking into account the time required for any further investigations"*.

When **disciplinary or contentious proceedings are initiated against a person implicated or the author of an abusive alert**, the data relating to the alert may be kept by B&B HOTELS in charge of alert management until the end of the proceedings or the limitation period for appeals against the decision taken.



The data may be kept for a longer period of time, in intermediate archiving, if CASPER BIDCO is legally obliged to do so (for example, to meet accounting, social or tax obligations), or for evidential purposes with a view to a possible control or dispute, or for the purposes of carrying out internal or external quality audits of the processes for handling alerts.



Appendix 1: List of phone numbers to contact the alert platform

#	Launch date	Country	Number	Type	Language 1	Language 2
1	07.08.2021	France	+33 1 76 75 31 33	Local	French	English
2	07.08.2021	Germany	0800 1814419	Toll free	German	English
3	07.08.2021	Czecky	+420 296 182 801	Local	Czeck	English
4	07.08.2021	Slovania	+386 1 777 45 47	Local	Slovania	English
5	07.08.2021	Austria	+43 720 022446	National	German	English
6	07.08.2021	Poland	+48 22 292 29 07	Local	Polish	English
7	07.08.2021	Belgium	+32 78 48 27 57	National	French	English
8	07.08.2021	Spain	+34 518 88 05 71	National	Spanish	English
9	07.08.2021	Portugal	+351 304 500 228	National	Portuguese (PO)	English
10	07.08.2021	Italia	800 828 454	Toll free	Italian	English
11	07.08.2021	Switzerland	+41225017054	Local	French	German
12	07.08.2021	Brazil	+55 11 4210-5189	Local	Portuguese (BR)	English
13	20.01.2022	Hungary	+36 21 211 1482	National	Hungarian	English
14	09.03.2022	Netherlands	+31202621742	Local	Dutch	English
15	23.03.2023	United Kingdom	+44 808 273 5257	Toll free	English	-
16	23.03.2023	Denmark	+ 45 80 25 42 52	Toll free	Danemark	English
		B&B Hotels Company's ID code		1990		