LOBBYING POLICY

1. Purpose and scope

This policy is part of Brøchner Hotels, B Corp commitment. It explains how we engage in public policy, advocacy and lobbying, both directly and indirectly, in Denmark and internationally. This includes contact with public authorities and regulators, membership of industry associations and collective initiatives, and any work carried out on our behalf by external advisors or partners.

We engage only in ways that support positive social and environmental progress, rather than positions that would lower social, environmental or governance standards. This is in line with the B Corp standards, B Lab's Theory of Change and the UN Sustainable Development Goals.

2. Our principles

When we take part in dialogue, collaborations or industry communities relevant to legislation or political decisions, we commit to:

• Act with integrity, transparency and accountability, and be clear about our positions and intentions.

• Take positions consistent with our commitments to human rights, environmental protection, climate action and responsible business conduct.

• Base our positions on credible, relevant and, where possible, scientific data.

3. Political contributions and anti-corruption

Brøchner Hotels does not make financial or in-kind contributions to political parties, candidates or campaigns.

We do not give or accept gifts, hospitality or other benefits that could create, or appear to create, undue influence, and we have zero tolerance for bribery, corruption and facilitation payments. We comply with applicable law on political engagement and anti-corruption.

4. Industry associations and collective initiatives

Brøchner Hotels is a member of Dansk Erhverv, a Danish business confederation that engages in policy advocacy and lobbying on behalf of its members across a range of areas including labour market conditions, trade, and business regulation.

We do not direct or control Dansk Erhverv's lobbying positions. However, in line with Section 4 of this policy, we monitor their public positions and assess alignment with our commitments to human rights, environmental protection, climate action, and responsible business conduct.

Where Dansk Erhverv advocates on matters that conflict with our commitments, we will make our own position clear, engage constructively within the organization and be transparent about any significant divergence. Our red lines include advocacy that undermines climate action aligned with the Paris Agreement, internationally recognized human rights, or fundamental labour rights. If such a conflict cannot be resolved within 12 months, we will reconsider and, if necessary, end our membership.

Brøchner Hotels does not use our Dansk Erhverv membership to conduct lobbying that would contradict the principles set out in this policy.

We review the public positions of Dansk Erhverv and any other association we belong to at least once a year, with a focus on climate, environment, labour market conditions and human rights. The review is carried out by our Chief Sustainability Officer and reported to Executive Management.

5. Governance and review

• This policy is approved by the Board of Directors and reviewed by the Board at least once a year. The CEO is accountable for enforcing the policy.

• Management makes sure relevant employees know the policy – it is shared at onboarding and referenced when we brief external advisors or partners on these matters – and assesses the risk of breaches.

• Each year, Executive Management maps all contact with public authorities and all memberships with a public affairs function, assesses the risk of non-compliance, and reports the results, including any breaches and actions taken, to the Board.

• If a breach is suspected or confirmed, we assess the specific situation, discuss it with those involved, and adjust our collaborations and internal procedures as needed. The outcome feeds into the annual review.

6. Raising concerns

• This policy is publicly available on our website.

• Stakeholders can raise concerns about our lobbying conduct through our grievance mechanism (see our grievance procedure at our website). Concerns are treated confidentially and without risk of retaliation.

7. Current activities

Brøchner Hotels does not currently carry out direct lobbying as a standalone activity and makes no political contributions. If this changes, we will update this policy and disclose our approach, positions and any contributions before we begin.

POLICY OWNER: Chief Executive Officer

NEXT REVIEW: 2027

APPROVED BY: CEO Brøchner Hotels A/S

Nickolas Bjerg

APPROVAL DATE: 28. oktober 2026