

CONSUMER PROTECTION POLICY

I. INTRODUCTORY PROVISIONS

Maistra Hospitality Group (MHG) is one of the leading tourist groups in Croatia, and includes two companies: Maistra d.d., Rovinj, Obala Vladimira Nazor 6, OIB: 25190869349 and HUP-ZAGREB d.d., Zagreb, Trg Krešimira Ćosića 9, OIB: 66859264899. Maistra Hospitality Group operates as part of Adris Group. This Policy applies to both listed companies (hereinafter: Company or Companies).

POLICY SUBJECT

The Consumer Protection Policy (hereinafter referred to as the Policy) sets out basic principles of the Company social responsible conduct in the area of consumer protection.

Certain questions or areas related to the principles and rules of conduct set forth in this Policy are regulated in more detail by other acts of the Company (policies, regulations, procedures and other acts).

POLICY SCOPE

This Policy applies to all employees working for Maistra d.d. and HUP-ZAGREB d.d. We expect our suppliers to adhere to our Supplier Code of Conduct and to implement appropriate measures as part of their operations.

II. GENERAL PROVISIONS

We are aware that guests are our key stakeholder and we have an obligation to our quests to offer them the best service.

Guests are at the heart of our business, and without these partnerships our business wouldn't exist. Part of our commitment to guests is responding to their needs, hearing their concerns and committing ourselves to guest satisfaction.

Guest satisfaction monitoring

Regular interaction with guests as a key stakeholder helps us to understand their views and interests. Service quality is regularly reviewed and adjusted according to the latest guest feedback. Results of guest satisfaction monitoring activities are considered when making business decisions and defining further strategies.

Socially responsible marketing

Our brands are advertised and marketed in a socially responsible manner. The Company provides a clear and direct message with relevant information about our destinations and services offering reliable information to our guests.

Digital transformation

Investments in the development and implementation of advanced technologies are our strategic priorities in order to improve the user experience and to reduce our ecological footprint and pressure on resources in the environment.

Data protection and information security

We have implemented a personal data management policy and adopted a process which ensures that personal data is collected and processed in a legal manner aligned with the European General Data Protection Regulation and relevant national laws.

We apply technical and organisational measures to protect personal data and only process it on the basis of legal grounds.

A Data Protection Officer has been appointed who assures the implementation of data protection requirements and trains employees to handle personal data carefully and to report any suspicion of misuse.

We are aware that by developing new technologies we may experience security threats that can jeopardize the continuity of our business and may impact the security of our information systems.

Our goal is to enable a safe and reliable business by applying the best practices through introducing IT solutions and working with business partners that conduct appropriate safety measures.

We continuously upgrade our information security procedures and train our employees.

Consumer complaints

We have implemented a complaint management system which is available to our consumers on our premises or web page. The current set-up of the complaint management system enables us to react promptly in a focused and professional manner to ensure excellent service for our guests. All complaints received are documented and resolved in a timely manner.

III. FINAL PROVISIONS

Responsibility for implementation of the Consumer Protection Policy lies with the Management Board which ensures the implementation of the defined processes, measures and goals. The Management Board, by means of a special decision, prescribes the obligations and responsibilities of certain organisational parts of the Company for the implementation of the Policy.

The policy enters into force with the approval of the Management Board and is published on the Company's website.

All interested stakeholders can send their proposals and complaints to the Company electronically at the e-mail address <u>Sustainability@maistra.hr</u>.