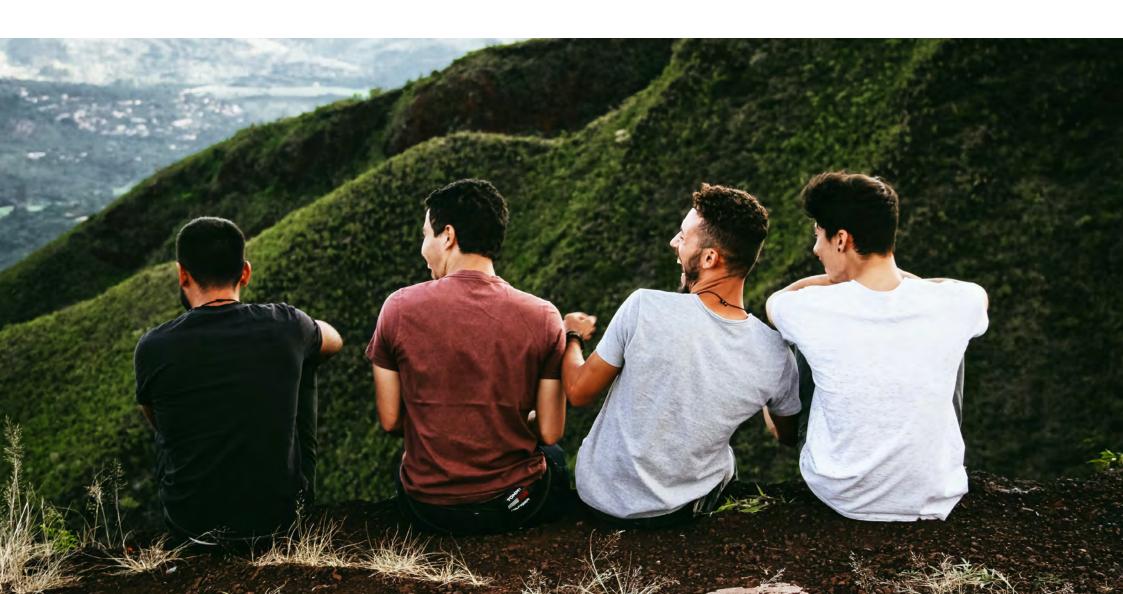




Our ESG policy outlines the impact we aim to achieve environmentally, and socially and how we conduct ourselves as a business. People are at the heart of all we do, so we're committed to ensuring we have the best environment and facilitate a positive lifestyle inside and outside of work.



ESG POLICY

Environmental Policy

Our environmental policy outlines our commitment to reduce our impact on the environment, including minimising waste and improving efficiencies on finite natural resources in the operations of departments.

This provides a framework for setting objectives and targets to improve environmental performance.

Social Responsibility Commitments

This commitment is in respect of our guests, team members and the local and wider communities in the Hotel. We hold the people we work with dear to us and want to ensure we champion initiatives that better their work/life balance. Our Social Responsibility action plan is based on the following principles:

- The Hotel's General Manager is responsible for the implementation of the policy standards.
- The Senior Management team analyse, consider and develop opportunities which may arise on a regular basis.
- There is full compliance with relevant environmental, health and safety and employment legislation. We have areas of focus that form the basis of our Social Responsibility Policy and it is vital to maintain an excellent working environment to retain loyal and productive Team Members. Our commitment is to create an experience where our team members feel valued, engaged, and stimulated.

Corporate Governance

Establishing sound and reliable governance practices is integral for our Hotel. It is imperative to always focus on efficiency in risk management, the development of an effective control environment and delivery of strategic goals to meet the expectations of both internal and external stakeholders.

Board of Directors Committees

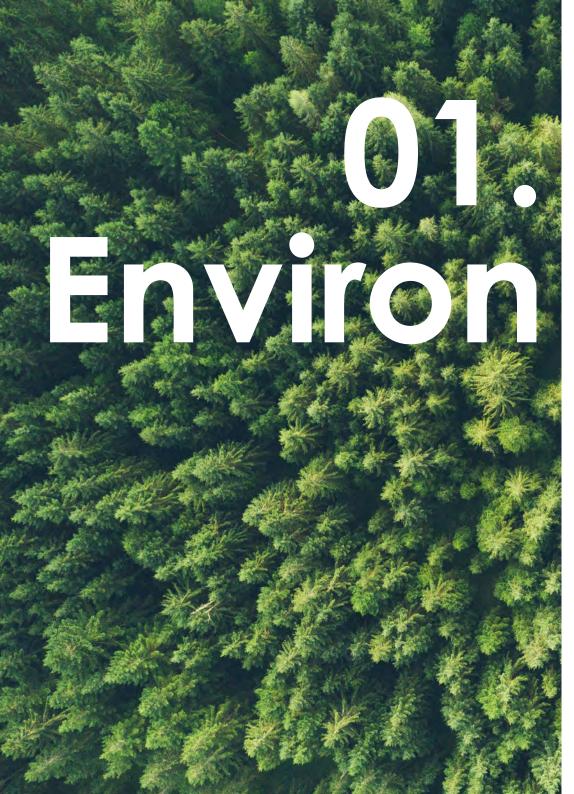
Legal and Regulatory Framework

Organisational Hierarchy

Transparency and Accountability

Monitoring and Internal Control

Financial Integrity



Policy

We recognise that our work may have a direct or indirect effect on the local, regional and global environment. We are committed to reducing any harmful effects on the environment and in working with reputable associations, we aim to understand, follow and implement best environmental practices wherever possible. We encourage our team, suppliers and guests to be environmentally aware through initiatives such as recycling and trying to be energy efficient.



Introduction

Our policy is led by the General Manager and an appointed NRG Champion.

To help us deliver our commitment, we launched NRG: an initiative focused on delivering energy-saving efforts daily through our Hotel NRG Champions.

The Hotel team are responsible for day to day and month on month management of the environmental standards for our Hotel.

Environmental protection

Our goal is to prevent landfill waste and improve recycling by reviewing how supplies and equipment are purchased, packaged, delivered, used and disposed of while complying with environmental legislations.

The operation of our Hotel is our primary source of emissions. In 2020, we experienced a huge decrease in utility consumption, largely as a consequence of reduced occupancy and complete or partial temporary closure of our Hotel.

To minimise energy and carbon emissions in periods of reduced occupancy, our Hotel was advised to follow operational best practises, including such as partial building shutdowns and enhanced building controls to save energy and minimise carbon emissions when occupancy was low.

Engagement

This strategy, as well as our environmental performance and other relevant details, will be communicated to our team. Team recommendations for improving environmental efficiency will be considered and implemented where appropriate.

Objectives

We have areas of focus that form the basis of our Environmental Policy:

- · Efficient use of water and energy
- Recycling
- Minimising waste
- Sustainable transport
- Responsible purchasing
- Minimising noise disturbance
- Use of non-toxic products
- Working with clients and suppliers to encourage high environmental standards
- Raising awareness and training team members on environmental issues



Kitchen

LED lighting in kitchen increasing the efficiency of the lights.

Team trained to ensure that dishwashers are filled to the recommended capacity and the coolest effective water temperature is used (within Health and Safety requirements).

Team trained to review and adjust usage of kitchen appliances and operating hours of ventilation hoods based on daily business needs.

Guest rooms

Creating a turn off culture for both team and guests.

Installing intelligent heating and cooling management systems.

Look into switching to more sustainable energy providers.

Promoting drinking tap water applicable for both the team and guests.

Housekeeping

Ensuring lights and plug sockets are turned off after leaving a guest room.

Politely reminding guests to reuse towels and not opt for linen changes as regularly.

Team trained to ensure the washers and dryers are filled to the recommended capacity and that the coolest effective water temperature is used. Automatic dosage system for chemical cleaning products (laundry teams trained to use the prescribed amounts of chemicals).

Team trained to check for and report visible leaks from guest bathroom fixtures (toilets, taps, valves, shower heads), trained to conserve water while cleaning (e.g. one-flush toilet cleaning, not leaving water running, etc).

Offices

Setting computers to auto-sleep after not being used.

Back of house

Creating a turn off culture for both team and guests.

Front of house

Motion sensor lights for during night shift.

Signage around the Hotel in both guest bathrooms and team member areas of properties reminding to keep water usage to a minimum.

Energy is the second highest controllable cost factor in the hospitality industry after labour.



Kitchen

Ensure different bins are available so that waste can be separated into glass, paper and card, food waste and general waste.

Recycle cooking waste oil (through delivery or pickup from recycling vendor).

Guest rooms

Digital check-ins.

Paperless offices.

Paper recycling bins.

Housekeeping

Using recyclable cleaning products.

Moving away from single use plastics and reusing/refilling products.

Offices

Think before you print campaign - swapping folders to online drives.

Only printing where absolutely necessary.

Paper printed on one side re-used for internal copies, printouts, notepads, etc. (applies to non-confidential documents only).

Recycled paper should be procured.

Back of house

Signs and notices in team view reminding of environmental awareness and the necessity of recycling.



Kitchen

Food, glass, paper / other reusables – minimising unnecessary waste can lower operating costs and overheads.

Housekeeping

Using refillable dispensers for soaps, shampoos and conditioners.

Offices

Paper recycling bins in all offices.

Back of house

Before disposing of waste think whether another department may still be able to make use of said item.



Guest rooms

Encouraging guests to use public transport and carbon neutral means of travel like walking and using bikes where possible.

Team

Encouraging the team on site to use public transport and carbon neutral means of travel like walking and using bikes where possible.

Offer team members incentives that encourage alternative transportation use - e.g., bicycle racks, discount transit passes, preferred parking for carpool or hybrid / electric vehicles, rideshare / carpool matching.

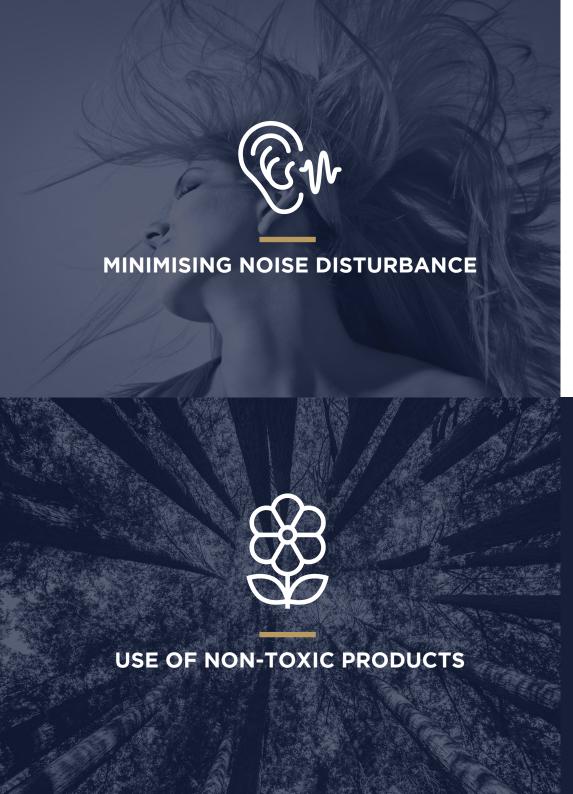


Kitchen

Look to use ethical local providers helping to support local businesses, purchase goods from diverse suppliers (i.e. women-owned, veteran-owned, small- or medium-sized, or minority-owned businesses) – although if using smaller local suppliers will result in more vehicles traveling to the Hotel – a single larger supplier may be a more viable option.

All suppliers must abide by environmental laws and regulations and not have a negative impact on the surrounding community and environment.

Suppliers are urged to create and implement sustainable practices, such as reducing energy and water usage, reducing packaging, and reusing and recycling waste and resources utilised by their firm whenever possible.



Kitchen

Keep doors closed.

Guest rooms

Apply a volume limit on in room televisions.

Housekeeping

Keep doors closed when operating appliances and machines.

Back of house

Keep doors closed when operating appliances and machines.

Front of house

Outside dining areas and bars enforcing strict shut off times in conjunction with volume limits.

Kitchen

Ensure products being used pose no harm to the environment - check they do not have the symbol 1.

Housekeeping

Ensure products being used pose no harm to the environment - check they do not have the symbol 1.

If there is a need to use harmful chemicals, they should be disposed of responsibly.





WORKING WITH CLIENTS
AND SUPPLIERS TO ENCOURAGE
HIGH ENVIRONMENTAL STANDARDS



RAISING AWARENESS AND TRAINING TEAM MEMBERS ON ENVIRONMENTAL ISSUES

All Departments

All departments on property should be invested in using sustainable suppliers and making conscious decisions on which suppliers they will use.

Connect suppliers to share best practices.

Participate in suppliers' sustainability efforts.

Team

Face to face team training conducted during every team member's induction using PowerPoint presentation. There are also Flow training modules available for this.

- It is made clear why team members should care and we will provide them with goals.
- NRG champions are appointed at the Hotel.
- Progress will be monitored and success will be rewarded (incentives).
- Compulsory Flow training on environmental sustainability and impacts.
- Mandatory signage displaying green policy and marketing.
- Sustainability goals and performance information posted on back of house (with actions from each department).



Responsibility Volumitment

Our Hotel is committed to acting in a socially responsible manner in respect of our guests, team members and the local and wider communities. Creating a positive environmental and social impact across our Hotel, supply chains and communities to make a meaningful difference.



Introduction

Our Social Responsibility action plan is based on the following principles:

- This policy is led by the General Manager and Senior Management team at the Hotel who are responsible for implementation of policy standards.
- The Senior Management team analyse, consider and develop opportunities which may arise on a regular basis.
- There is a full compliance with relevant environmental, health and safety and employment legislation.

We have areas of focus that form the basis of our Social Responsibility Policy:

- Looking after team members
- Looking after customers
- Suppliers' standards
- Protecting the environment
- Community engagement
- Continual improvement & team ideas



It is vital to maintain an excellent working environment to retain loyal and productive team members. Our commitment is to create an experience where our team members feel valued, engaged, and stimulated.

- Training and development: All team members have the opportunity to learn and develop a range of skills as well as attend training courses to support their ongoing development.
- Equality and Diversity:
 - Information and training are provided at all levels in our equal opportunities policy and effective communication techniques that promote respect and positive behaviour.
 - The Hotel works to develop relationships locally to promote employment or work experience for disadvantaged groups.
- Communication and involvement in the environment:
- The Hotel has an Environmental Champion who is responsible for setting local targets and delivering training and communication activities.
- All team members are provided with health and safety training during their induction and on a regular basis throughout the year.
- Our team members are provided with meals on duty. Our Management Teams are responsible for ensuring that a variety of food, that is balanced and healthy is provided at each mealtime. The Hotel works to promote a healthy lifestyle for the team, by providing information on local well being activities and support groups.
- The Hotel has a list of benefits available to team members, displayed in the back of house area.
 These include (where applicable): discounted stays, discounts in Food and Beverage, free onsite parking, free use of gym and leisure clubs, and more.
- It is of the utmost importance to us, that team members feel fully engaged in what we do.
 To demonstrate our ongoing commitment toward true engagement in what we do, we carry
 out a bi-annual online Team Member Engagement Survey to gauge how team members
 are feeling. The survey results and Hotel Action Plans are shared with all team members.
- Mental Health First Aiders are available in our Hotel as a point of contact for a team member who is experiencing a mental health issue or emotional distress.



It is so important to look after our customers, to make sure that they have a positive and lasting impression of our business.

- We focus a significant amount of our activities on addressing guest service improvements and recognizing our most loyal guests.
- We develop initiatives or projects that will enhance the guest experience and environment of the Hotel.
- We support team members in actively resolving guest problems and to exceed guest expectations.
- We are pleased to discuss any specific food or dietary requirements. We stock items to assist
 with specific dietary requirements such as gluten free items, vegetarian, vegan menus and nondairy milk alternatives. Calorie information by dish is provided on our menus, as well as allergen
 information.
- Our Health club and Spa team members are available and happy to offer advice and answer general or specific questions on exercise, well-being and skin care.



Our goal is to prevent landfill waste and improve recycling, by reviewing how supplies and equipment are purchased, packaged, delivered, used and disposed of while complying with environmental legislations.

We are working with suppliers to encourage high environmental standards.

- All departments at the Hotel are invested in using sustainable suppliers and making conscious decisions on which suppliers they will use.
- We connect suppliers to share best practices.
- We participate in suppliers' sustainability efforts.
- We do look to use ethical local providers helping to support local businesses, purchase goods from diverse suppliers, where possible.
- All suppliers must abide by environmental laws and regulations and not have a negative impact on the surrounding community and environment.
- Suppliers are urged to create and implement sustainable practices, such as reducing energy and water usage, reducing packaging and reusing and recycling waste and resources utilised by their Company whenever possible.



We are committed to continuing work in this area by following a philosophy of "Reduce, Reuse and Recycle" which is introduced to all team members during their induction.

Objectives:

- Efficient use of water and energy.
- Reduce business carbon footprint.
- Recycling.
- Minimising waste.
- Sustainable transport.
- Minimising noise disturbance.
- Use of non-toxic products (e.g. biodegradable cleaning products).
- Raising awareness and training team members on environmental issue.

We are committed to achieving the highest standards in energy efficiency and our targets are set in the following areas:

- Minimising of energy consumption and cost.
- Minimising water consumption and cost.
- Reducing our CO2 emissions.
- Giving high priority to energy efficient investments.
- Reducing significantly the environmental impact arising from energy and water use.



We are committed to improving the lives of those in our shared communities. It is important to understand key social issues in our community that are linked to the travel and hospitality industry and where we can have a meaningful impact by leveraging our wealth of capabilities and skills.

- Sponsorship of or monetary donations to: local charities, sports clubs, societies, youth groups, community centres or anything else appropriate.
- Support local charities etc. by donating time i.e. team participation in volunteering days.
- Supporting the surrounding community by employing local people.
- Work experience working with local schools and colleges to enable Students to experience our wonderful industry.

As part of Team consultation activities we ask the Team for their ideas and use their expertise to find solutions to continually improve.



It is imperative to always focus on efficiency in risk management, the development of an effective control environment and delivery of strategic goals to meet the expectations of both internal and external Customers.



Introduction

Our hand-picked team combines all their expertise and experience in hospitality so that they can best serve client's needs. We work to ensure to get the right results for all stakeholders. Establishing sound and reliable governance practices is integral for our Hotel. It is imperative to always focus on efficiency in risk management, the development of an effective control environment

and delivery of strategic goals to meet the expectations of both internal and external Customers.

Our Corporate Governance Commitment is based on the below principles:

- Integrity: We always conduct our business with integrity. Every board and team member behave
 ethically and does the right thing, even behind closed doors.
- Skill, care and diligence: We always conduct our business with due skill, care and diligence.
- Management and control: We always take care to organise and control our affairs responsibly and
 effectively, with adequate risk management systems.
- Financial prudence: We always maintain adequate financial resources.
- Market conduct: We always observe proper standards of market conduct, within UK competition law.
- Customers' interests: We pay due regard to the interests of our clients and treat them fairly.
 Senior Management ensure that a culture of treating customers fairly is embedded throughout our Hotel.
- Communications with clients: We pay due regard to the information needs of our clients and communicate information to them in a way which is clear, fair and not misleading.
- Conflicts of interest: We manage conflicts of interest fairly both between ourselves and our customers and between a customer and another client.
- Customers relationships of trust: We take reasonable care to ensure the suitability of our advice and discretionary decisions for any customer who is entitled to rely upon our judgement.
- Relations with regulator: We deal with our regulators in an open and co-operative way.
 We take reasonable steps to ensure that the business complies with the relevant requirements and standards of external Auditors.

Key elements of our Corporate Governance Policy:

- · Board of directors and committees
- Legal and regulatory framework
- Organisational structure
- Monitoring and internal control (Financial)
- Transparency and accountability
- Policies and procedures



The responsibilities of the board include setting the company's strategic aims.

Appointing Michels and Taylor (Hotel management company) to provide the leadership to put them into effect, supervising the management of the business and reporting to stakeholders.

Corporate governance is therefore about what the board of the company does and how the board sets the values of the company, and it is to be distinguished from the day-to-day operational management of the company by full-time executives.

The Board hold regular meetings where areas of responsibility are established, and the appropriate individuals are obliged to provide updates to the Board at these meetings.

The meetings will be appropriately minuted and records kept.

We provide written standards that are reasonably designed to deter wrongdoing and to promote compliance with applicable laws, governmental rules and regulations.



MONITORING AND INTERNAL CONTROL

(FINANCIAL)

We establish, implement and maintain:

- Senior Management Hotel team
- Decision-making procedures and an organisational structure which specifies reporting lines and allocates functions and responsibilities clearly and in a documented manner.
- Adequate internal control mechanisms designed to secure compliance with decisions and procedures at all levels.
- Effective internal reporting and communication of information at all relevant levels and to any third party involved.
- Orderly records of our business and internal organisation; considering the nature, scale and complexity of our business and the nature and range of services and activities undertaken in the course of that business.

We ensure that our relevant team members are aware of the procedures to be followed for the proper discharge of their responsibilities.

We have systems and procedures in place to safeguard the security, integrity and confidentiality of financial and accounting information, taking into account the nature of the information in question.

We have regular meetings where senior managers report on the effectivness of its systems and controls and what measures have been taken to address any deficiencies.

Our policies and procedures help with monitoring internal financial and accounting controls:

- GDPR Policies (including Data Security Policy, Information Security Policy, and Privacy Policy)
- Exceptional Expenditure Policy
- Financial Parameters and Authority Policy
- Internal Audit



Transparency is a critical component of our Hotel corporate governance because it ensures that all of our Company's actions can be checked at any given time by an outside observer. This makes its processes and transactions verifiable, so if a question does come up about a step, the Company can provide a clear answer.

Corporate accountability refers to the obligation and responsibility to give an explanation or reason for the Company's actions and conduct.

We have a set of internal guidelines that establish the rules and expectations of the Company.

These policies are designed to clarify and provide guidance on our expectations with regards to:

- Team member conduct (Code of Conduct Policy)
- Equal opportunities (Recruitment Policy, Equal Opportunities and Diversity Policy)
- Health and safety at work (Health and Safety Policy, Food Safety Policy, Grooming Presentation Policy)
- Use of social media and the internet (Mobile Phone and Social Network Policy)
- GDPR policies
- Working times, absences and holidays (Property Sickness Absence Procedure, Team Meals and Breaks Policy)
- Finance (Exceptional Expenditure Policy, Financial Parameters and Authority Policy)
- Environmental Policy
- Corporate Social Responsibility Policy
- Modern Slavery Policy