



Legacy Hotels & Resorts is dedicated to placing environmental, social and governance (ESG) considerations at the forefront of the organisation's operations and decision making. In order to satisfy the long term objectives and expectations of our investors, employees and partners, we recognise the significance of ESG throughout our operations. We have undertaken a material evaluation to determine the most pertinent areas for us to focus on as we begin the process of integrating ESG into our business.

The purpose of this ESG Policy (The 'Policy') is to harmonise the aforementioned objectives with our operational and business strategies.

# CORPORATE RESPONSIBILITY

Legacy Hotels & Resorts views being a good corporate citizen as an integral part of our core business.

The key planks of this in relation to our portfolio of hotels are as follows:

- Supporting the local communities in which we operate
- Environmental activities that make a positive impact for all stakeholders
- Group wide programs to make improvements a way of life

# WORKING WITH THE LOCAL COMMUNITY

Across our portfolio of managed hotels, we have a variety of individual local community initiatives that are tailored to the requirements of each hotel location/region. Whilst we co-ordinate activity at group level we empower our managers to connect locally within the community ensuring that our spirit of flexibility, entrepreneurship and collaboration is at the forefront of our approach.

All our hotels have a recruitment bias towards attracting local talent to seek to ensure that strong proportions of the economic value add from the hotel trading is put back into the local community.





Our hotels actively support local charities via direct donations or the provision of resources. Organisations supported by Legacy Managed hotels include local youth theatre groups and sports teams.

# ROOM TO REWARD

All Legacy Hotels & Resorts participate in the Room to Reward Program - www.roomtoreward.org

This program allows charities and voluntary groups to say "thank you" to their Hidden Heroes in a meaningful and tangible way without impacting their own budget.

Andy Townsend (CEO) is proud to serve as one of the Room to Reward Ambassadors.



# LEGACY HOTELS & RESORTS ESG STRATEGY

In late 2021 and as part of Legacy's drive to learn, independently validate and improve how we operate as a business with integrity and purpose, Legacy Hotels & Resorts, working with stakeholders across the portfolio of managed hotels and head office engaged Savills Earth to assist in developing a credible strategy and roadmap for improvement.

The scope of the work focused throughout 2022 on three main stages:

- 1. Stage 1: Identification of relevant ESG topics This stage comprised of a high-level peer and competitor assessment of ESG benchmarks, frameworks, and strategies, and understanding of broader legal landscape that may impact Legacy Hotels operation. The purpose was to determine ESG topics that are relevant to Legacy Hotels operation, and to understand where Legacy Hotels performs in the market, and whether the Group needs to take action to determine its place in the market. This base line informs where focus will be required and provides evidence of progress.
- 2. Stage 2: Prioritisation of key ESG topics This stage covers two main components, including a materiality assessment and an environmental data availability review. The materiality assessment is an objective approach to prioritise key ESG topics by assessing stakeholders' perception on the level of importance of different material issues and their potential impact on business continuity to Legacy Hotels. Material issues can include topics such as energy, carbon, placemaking, health & safety, transparency, and governance and/or sustainable design. The environment data availability review, on the other hand, provides information on current data gap, which is essential to determine potential next steps.
- 3. Stage 3: Formulation of ESG This stage develops a suitable ESG policy, strategic objectives and roadmap for Legacy Hotels consideration utilising the results of Stage 1 and 2. These will help kick of the process of embedding the appropriate levels of ESG into Legacy Hotels.

This three-stage approach provides the structure and focus points for setting the initial ESG framework for Legacy Hotels. It provides a suitable evidence base for how decisions have been taken and provide an opportunity to reach out to key partners and stakeholders to build engagement and ownership over the proposed policy and deliverables.

# ESG MAKING OUR ENVIRONMENT A BETTER PLACE TO LIVE AND WORK FOR ALL

# STRATEGIC FRAMEWORK

This strategic framework has been designed by taking full consideration of the expectations of different stakeholder groups, including investors/lenders, senior management, employees and sustainability professional, as well as the current status or positioning of ESG of Legacy Hotels & Resorts.

In the meantime, this strategic framework shall be regularly reviewed and updated as Legacy Hotels & Resorts is going through changes due to any internal or external factors.



### **Energy and Carbon**

Actively seek to reduce green house gas emissions, improve data management, enhance operational efficiency, and implement sustainable building operations.



### **Environment and Waste**

Preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy.



### Safe and Inclusive Environments

Cultivate a culture of inclusion with a zero-tolerance policy to discrimination. Contribute positively to the health, safety and wellbeing of our employees, customers and communities that we operate in.



# Governance and Compliance

applicable ESG laws and regulations. Robust ESG governance structure and procedures to enable effective management of ESG risks and opportunities.





# What is Sustainability and ESG?

- Energy & Carbon
- Water Use
- · Waste Management
- · Biodiversity Net Gain
- · Climate Risk & Resilience
- Renewables
- · Pollution & Air Quality
- Board Structure
- Risk Management
- Disclosure & Transparency
- Business Ethics
- Reporting Frameworks
- Green Finance



- Social Value
- · Health & Safety
- Wellbeing
- Jobs & Skills
- Human Rights
- Stakeholder Engagement
- Customer Satisfaction

Reduce the impact we have on the planet and each other, and do so in a way that is just, equitable, robust, transparent and accountable.

