



Sustainability Policy

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Introduction

1.1 Purpose

1.1.1 Bluserena Hotels & Resorts (following Bluserena) has developed an environmental, social and governance (ESG) strategy and vision for its operations in Italy. This is in the context the sustainability policy of the wider Azora Group, evolving market conditions, and regulatory requirements for European Union countries to move towards zero carbon and for businesses to demonstrate to their customers their ESG credentials.

1.1.2 This vision is consistent with long-term sustainable asset investment and management and involves operating under a well-defined and strict governance scheme, incorporating ESG principles that must be integrated into Bluserena decision-making processes.

1.1.3 This Policy aims to formalise the general ESG principles applicable to Bluserena in the context of Azora's wider policy.

1.2 Context and Approach

1.2.1 As one of the most recent and comprehensive pieces of ESG legislation the European Union's Corporate Sustainable Reporting Directive (CSRD) is taken as the most relevant reference framework.

This sets out the following ESG headings:

Cross-cutting themes

Environment:

- ESRS E1 – Climate change
- ESRS E2 – Pollution
- ESRS E3 – Water and marine resources
- ESRS E4 – Biodiversity and ecosystems
- ESRS E5 – Resource use and circular economy

Social:

- ESRS S1 – Own workforce
- ESRS S2 – Workers in the value chain
- ESRS S3 – Affected communities
- ESRS S4 – Consumers and end-users

Governance:

- ESRS G1 – Business conduct.

1.2.2 The Bluserena Sustainability Policy is set out below against these headings¹.



¹Bluserena will use this as a basis for future preparation for and compliance with the CSRD framework to the timescales prescribed by the EU.

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Environment

2.1 Carbon Reduction and our Impact on Climate Change

2.1.1 Bluserena endeavours to improve the technologies and systems of its assets to provide modern and sustainable energy services. It also encourages an increase in the proportion of renewable energy used wherever possible.

2.1.2 Examples of specific initiatives being pursued include:

- Investigate opportunities for further deployment of renewable and low carbon technologies across the portfolio with the aim of moving toward a zero-carbon energy supply by 2030.
- Consideration for full electrification and investigate removal of all gas across the portfolio.
- Investment in cost-effective low carbon energy efficiency and energy supply measures, e.g. procure hotel's energy from renewable sources, either through on-site generation or green power purchasing agreements.
- Rolling programme of cost-effective investment to move toward zero carbon energy supply by 2030.

2.1.3 Bluserena strengthens resilience and the capacity to adapt to climate and natural disaster risks in the places in which it operates. Bluserena also includes climate change measures in its policies and strategies, contributing to their mitigation.

2.2 Reducing Pollution

2.2.1 Bluserena prevents reduces pollution through its activities. It encourages sustainable and efficient use of natural resources.

2.2.2 Examples of specific initiatives being pursued include:

- Set up measuring systems to monitor the emissions of CO₂ and other pollutants in the assets related to the emissions in air, water and soil of each resort.
- Commit to ensuring that pollution prevention and reduction the risk of pollution incidents. Set up a full emergency response plan and seek to reduce usage of hazardous materials throughout operations.
- Disclose information on the production, use, distribution, commercialisation and import/export of substances of concern and substances of very high concern, on their own, in mixtures or in articles.

2.3 Improving Water Management and Marine Resources

2.3.1 Bluserena promotes the efficient use of water resources and sustainable practices in the extraction and supply of the fresh water used.

2.3.2 Examples of specific initiatives being pursued include:

- Understand the water consumption baseline through technical audits, benchmark the resorts to understand existing performance and efficiencies to help prioritise actions and identify opportunities to reduce consumption.
- Set up site-specific policies to every resort in order to reduce the negative impact on marine resources highlighting risks and opportunities. Consider implementation of a biodiversity action plan for appropriate resorts.
- Commit to reducing the material water consumption across our resorts and seek to install interventions to save and reuse water where appropriate.

2.4 Enhancing Biodiversity and Ecosystems

2.4.1 Bluserena carries out studies on biodiversity and ecosystems, minimising the impacts on the environment and respecting the environment.

2.4.2 Examples of specific initiatives being pursued include:

- Monitor the risks and opportunities arising from the operations of the resorts over local ecosystems by reporting on the conditions of nearby plantations, fauna infestation, etc.
- Adopt a transition plan where the strategy and business model are aligned with specific targets.
- Ensure that we are actively designing in features to improve biodiversity and ecology across all new developments and refurbishments.



2.5 Improving Resource Use and Circular Economy

2.5.1 Bluserena promotes sustainable waste management through prevention, reduction, recycling and reuse activities.

2.5.2 Examples of specific initiatives being pursued include:

- Benchmark our resorts for waste generation and recycling rates whilst working with operational teams to understand quick wins that will deliver waste consumption reduction and recycling rate increases.
- Report portfolio waste production and recycling rates.
- Implement a behaviour change campaign to reduce waste with a particular focus on food and plastic waste. Promote reduce and reuse principles among employees and guests.
- Reduce the use of single use products across our resorts and ensure that resources are 100% reusable, recyclable or compostable.
- Commitment to zero single use plastics.
- Develop a sustainable procurement policy that outlines sourcing criteria.

2.6 Green Certification

2.6.1 Bluserena is already working towards obtaining the BREEAM certification label with expected level "Very Good" on all the Resorts, within 2025.



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Social

3.1 Caring for Our Workforce

3.1.1 Commitments by Bluserena include:

- Creating a culture focused on attracting and retaining suitable employees for Bluserena.
- Promoting equal opportunities, professional development, diversity, integration and fair treatment for all Bluserena employees.
- Ensuring health and safety conditions for employees with the definition of suitable objectives and measures.

3.2 Working with Our Suppliers and Partners

3.2.1 Bluserena allies and cooperates with suppliers to develop initiatives that promote sustainability.

3.3 Caring for Our Communities

3.3.1 Bluserena participates, collaborates, and is involved in social projects, associations and NGOs that promote actions aimed at achieving sustainable development objectives. Examples of specific initiatives being pursued include:

- Advertise employment opportunities locally; engage with local work centres; collaborate with local schools.
- Continue with current suppliers with preference of businesses which are based locally.
- Establish a steering group and make future commitments including engaging with local community groups.



3.4 Looking After and Listening to Consumers and End-Users

3.4.1 Bluserena allies and cooperates with its customers to develop initiatives that promote sustainability. Examples of specific initiatives being pursued include:

- A possibility of a client survey focused on sustainability will be investigated. Bluserena will also communicate our environmental commitments and encourage customers to behave sustainably.
- Provide information to clients on sustainable practices (local food, energy consumption etc). Encourage sustainable behaviour (resource saving).
- Ensure that our resorts are safe places for staff, customers and visitors by ensuring we are actively managing health and safety risks across our business.
- Explore opportunities to implement sustainable transport features and review accessibility throughout all of our resorts.

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Governance

4.1 Solid Governance and Ethics

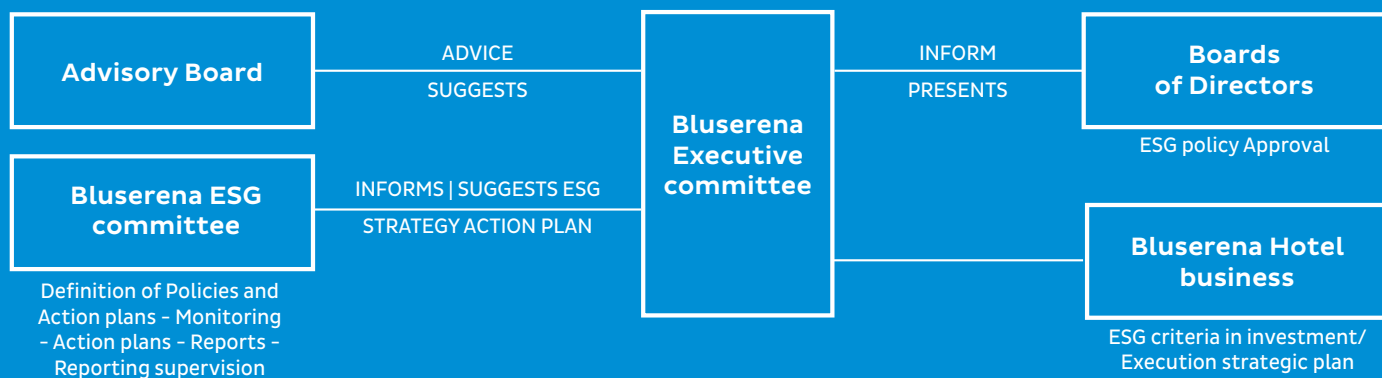
4.1.1 Actions Bluserena takes include:

- Conducting the investment, divestment and asset management process responsibly and ethically, in line with the Code of Conduct.
- Collaborating with the sector and its employees, partners, operators and investors to enhance the application of ESG criteria and be jointly more effective in their implementation.
- Ensuring that the protection of human rights is always respected and supported in the investment and asset management process.
- Basing relations with investors on regularity, transparency, equal treatment and legal compliance.

4.2 Clear and Transparent Reporting

4.2.1 Commitments by Bluserena include:

- Defining a standardised, comparable and reliable reporting system on ESG aspects by Bluserena.
- Communicating the data, objectives and progress in implementing the ESG principles transparently and periodically.
- Expand resourcing to include additional staff and budget.



5

Approval and Next Steps

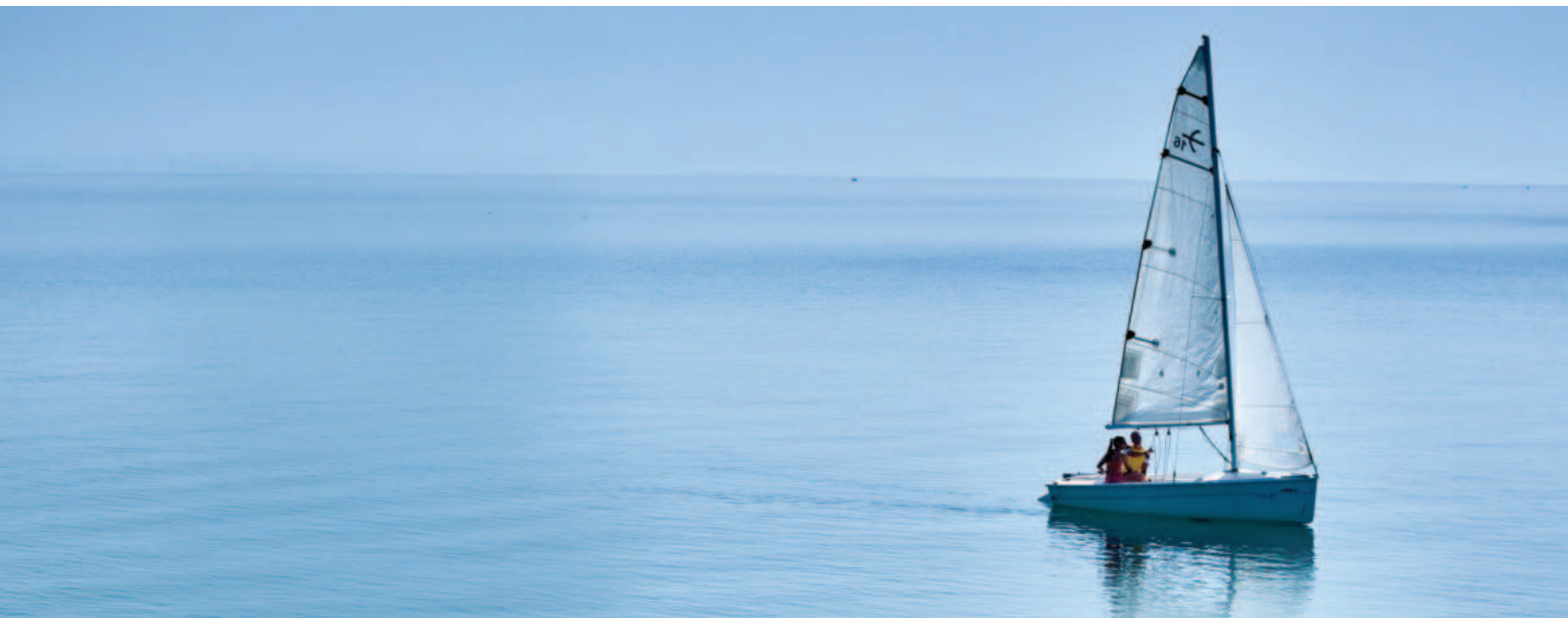
5.1 Approval of the Policy

5.1.1 As part of its supervision duties, the Bluserena's Board of Directors approves this Policy and therefore assumes responsibility for it, along with the commitment to integrate it at all necessary levels of Bluserena and in the context of Azora Group's overall ESG commitments and Sustainability Policy.

5.2 Policy Review

5.2.1 This Sustainability Policy, and any subsequent variations, will be published on the Group's website: www.bluserena.it/esg-sostenibilita.

The Policy may be reviewed at any time and will be reviewed annually at minimum. The main objective of reviewing the Policy will be to keep it up to date in accordance with best market practices, assessing the associated procedures and including new relevant ESG commitments for Bluserena.



5.3 Change Log

5.3.1 Below is a change log of updates to this policy.

Date of preparation	Date of approval	Version	Description of changes
05.03.2024	22.04.2024	#1	Initial version



BLUSERENA
HOTELS & RESORTS

Sustainability Policy

bluserena.it

The present document has been drafted on 05/03/2024 by Savills Italy S.r.l.
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