

INSULA ALBA Resort & Spa

**SUSTAINABILITY REPORT
2023**

Release Date: May 2024

1. Introduction

1.1 Brief description of the Sustainability Statement

This is the first Sustainability Statement of the INSULA ALBA Resort & Spa and aims to provide the public and other interested parties with environmental information, regarding the environmental impacts and performance, as well as at the continuous improvement of the environmental performance of our hotel. It also, represents a way to response to the requirements of the interested parties that are affected by our activities.

While fully recognizing our responsibilities towards the environment and society, we have decided to manage all our environmental aspects with a rational and systematic way, aiming at the continuous improvement of our environmental performance and at our establishment in the public perception as a socially responsible hotel.

Through the following chapters of the Statement, we are trying to give the reader a full picture regarding the way we integrate our environmental concerns in our daily activities.

For us, at INSULA ALBA Resort & Spa, the concept of sustainable management is intertwined with our vision for continuous development and improvement. For that reason, we regularly check our environmental indicators and train our staff, trying to constantly improve our performance.

Enjoy your reading,

Manioudaki Stella

General Manager

1.2 Hotel Presentation

Surrounded by the crystalline waters of the sea and glistening pools, Insula Alba Sea Side Resort & Spa offers a Greek island experience like no other, seamlessly connecting guests with the soothing element of water. The name, “Insula Alba,” is Latin for “White Island,” inspired by the pristine white colour that defines this luxurious 5-star adults-only hotel in Crete. Nestled in the sprawling resort of Hersonissos, our mission is to provide discerning guests with the epitome of luxury accommodation in Crete, distinctive facilities, and exceptional service all enveloped in a captivatingly serene environment. Spanning 28,000 square meters of breathtaking landscapes, Insula Alba Sea Side Resort & Spa is a luxury resort standing as a radiant beacon of hospitality, dedicated to ensuring that every guest revels in the ultimate comfort and convenience. Our unwavering commitment to warm, attentive service is the hallmark of our identity, affording guests an unrivalled opportunity to unwind and rejuvenate within the carefully curated luxury that defines Insula Alba Sea Side Resort & Spa. Here, in this enchanting 5- star hotel in Crete, considered one of the top hotels in Crete island, we craft an exclusive adult-only environment, a tranquil sanctuary for those seeking indulgent and attentive holidays.

Every facet of this luxury hotel, from our meticulously designed rooms and suites to the common areas and open spaces, exudes the essence of modern minimalism, artfully weaving the calming influence of water into the very fabric of our ambiance. Our 5-star hotel in Crete boasts 182 thoughtfully crafted rooms and suites, each with its unique theme and decor, embodying a contemporary, minimalist island aesthetic. Whether you opt to bask in the Mediterranean sun by the pool, take a refreshing dip in the inviting indoor pool, savour culinary delights at our Main Restaurant, or immerse yourself in the exquisite offerings of our A la carte restaurant, Insula Alba Sea Side Resort & Spa offers an array of experiences tailored to satisfy your every desire. Additionally, our Spa and Fitness Centre are poised to pamper you with relaxation and wellness, while our pool and piano bars beckon guests to lounge the day away in absolute bliss. In this adults-only hotel in Crete, every moment is thoroughly crafted to perfection, beckoning adults to unwind and fully savour the beauty and serenity of this enchanting Greek island.

Idyllically situated within the charming village of Analipsis in Hersonissos, a mere 20 kilometres east of Heraklion’s airport and the vibrant city of Heraklion, our sea view hotel serves as the quintessential gateway to unforgettable island adventures. Our prime location places you at the crossroads of exploration and relaxation, making Insula Alba Sea Side Resort & Spa an impeccable choice for your Cretan holidays. For those with an appetite for discovery, the treasures of Crete are at your doorstep. Just 5

kilometres away, the renowned Aquaworld Aquarium invites you to delve into the mesmerizing underwater world, while the Crete Golf Club challenges golfers to test their skills on its splendid greens. These captivating attractions are but a stone's throw from our resort, ensuring that your days are filled with exhilarating experiences. Welcome to Insula Alba Sea Side Resort & Spa, one of the best hotels in Crete for adults seeking a relaxing escape where top-tier quality and comprehensive service await at every turn.

2. Hotel Policies

2.1 Environmental Policy

Environmental protection and sustainability are some of the main operating pillars of GOLDEN Hotels & Resorts Group of Companies. GOLDEN Hotels & Resorts comply with all regulations, legislation and approved codes of practice relating to the processes and activities which the company undertakes.

Our policy aims not only in the harmonisation with the relative national legislation and the prevention of pollution of environment, but also in the continuous improvement of environmental achievements of hotels in a combination with the surveillance and reduction of all environmental pressures that emanates from the activities of our hotel units.

We particularly aim to:

- ❖ Implementation of actions for energy saving, reduction of water consumption, proper management of wastewater produced and reduction and proper management of solid waste produced.
- ❖ Maintenance of good quality of atmospheric air
- ❖ Protection of beach and quality of waters
- ❖ Collaboration with institutions of region to preserve the natural beauty of the area.
- ❖ Training and awareness of hotel staff in order to actively participate in the environmental management system.
- ❖ Informing guests about the hotels' environmental actions, with the aim of encouraging their active participation
- ❖ Achieving a safe and sustainable environment for our community, future generations, and ourselves.

To achieve our goals, in cooperation with our staff and our customers:

➤ We save water.

We gradually reduce the flows in all taps. We educate customers on ways they can save water. We inform-educate staff on water conservation.

➤ We save electricity.

We are gradually changing all lamps to LEDs. We are installing motion detection sensors in common areas. We educate customers about ways they can save energy. We inform-educate staff about energy saving. We

expand the solar field. We thermally insulate the buildings, in order to reduce the use of air conditioners.

➤ We protect nature.

We keep our chemicals in a safe place. We maintain our facilities to prevent any spills, and in case of a leak, we install detection systems for timely repair.

➤ We use more technology-we reduce printing.

We are placing computers in more parts of the hotel so that communication is done by mail. We are installing fault logging software to reduce printouts and resolve faults immediately. We are replacing printers with printers with double-sided printing capability. We eliminate paper customer satisfaction questionnaires, and use an online application to collect questionnaires.

➤ We recycle.

We place recycling bins in public areas and rooms. We recycle batteries, printer ink, cooking oils, paper, plastic, aluminum and electronic appliances.

We are committed to creating an "environmental culture" in the operation of our business by promoting our policy to all our customers, employees and partners.

2.2 Human Rights Policy

GOLDEN Hotels & Resorts Group of Companies acknowledge and respect the principles contained in the Universal Declaration of Human Rights. GOLDEN Hotels & Resorts' Human Rights Policy reflects the Company's commitment to conduct its business in a manner consistent with these principles and to protect human rights within the company's sphere of influence. As a responsible employer, GOLDEN Hotels & Resorts, follow responsible workplace practices, and endeavors to conduct its business operations in a manner that is free from complicity in human rights abuses. GOLDEN Hotels & Resorts' core values and culture embody a commitment to ethical business practices and good corporate citizenship.

1. Non discrimination and equality

GOLDEN Hotels & Resorts provide equality of opportunity and treatment, and respect each individual's human rights. We do not discriminate on the basis of race, colour, gender, religion, creed, age, social and civil status, family origin, physical or mental disability or sexual orientation in our hiring and employment practice.

All employees have access to the Hotel Manager, in order to resolve any issues that have occurred, which have not be resolved by their supervisors.

2. Protection of the rights of a Child

GOLDEN Hotels & Resorts condemn all forms of exploitation of children. The Group of Companies do not recruit child labor and supports the elimination of exploitative child labor. GOLDEN Hotels & Resorts also support laws duly enacted to prevent and punish the crime of sexual exploitation of children. GOLDEN Hotels & Resorts will work to raise awareness concerning such exploitation, and will cooperate with law enforcement authorities to address any such instances of exploitation of which the Hotels become aware. GOLDEN Hotels & Resorts will continue to focus on programs that help children break out of the cycle of poverty that makes them and their families vulnerable.

3. Forced Labour

GOLDEN Hotels & Resorts support the elimination of all forms of forced, bonded or compulsory labour, and we do not accept the use of prison labour or illegal labour.

4. Health and safety

At GOLDEN Hotels & Resorts, caring for our associates means providing a safe and healthy environment at all times, ensuring that only the highest standards of health and safety are maintained for the benefit of all our employees and stakeholders.

Every employee, supplier and other stakeholders has a clear duty to take every reasonable precaution to maintain a safe and healthy working environment in order to avoid the possibility of injuring himself or putting at risk those with whom you work, and members of the public.

5. Working conditions including working hours

At GOLDEN Hotels & Resorts we will treat all employees fairly and honestly. All employees will be furnished with a written contract of employment with agreed terms and conditions, including notice of resignation from both sides.

All employees are provided with adequate and reasonable rest breaks, access to drinking water and other sanitary facilities, day off and statutory leave will also be granted to all employees. Our associates have access to services and training that support their well-being and encourage personal and professional growth.

6. Fair wages and compensation

Wages will be paid regularly, on time, and will reflect the experience, qualifications and performance of the employee. All employees will be compensated according to the labour laws and statutory regulations of the country and shall be paid at least the statutory minimum wage or the prevailing industry wage. All other types of legally mandated benefits and compensations shall be paid. Employees will also be provided with detailed information pertaining to their wages in writing.

Employees shall be granted and correctly compensated for any types of paid leave to which they are legally entitled. Examples of such leave include annual leave, casual leave, accident leave, and maternity leave.

At the end of the season, the best employee is awarded, based on the opinion of the customers and supervisors.

7. No harsh or degrading treatment/harassment

Every employee shall be treated with respect and dignity. Under no circumstances do we accept the use of humiliation or corporal punishment by our suppliers, their subcontractors or other business partners. No employee shall be subject to physical, sexual, psychological or verbal harassment or abuse during their employment with us.

We respect each associate's right to decide if he or she wishes to join, or not to join, associations or labor unions, and we comply with legal requirements worldwide regarding employee and third-party involvement.

8. Partners

GOLDEN Hotels & Resorts cooperates with suppliers and partners who are committed to respecting human rights. Any human rights issues between partners are resolved through constructive dialogue, in line with our local community policy.

9. Visitors

GOLDEN Hotels & Resorts respect human rights of guests. Our main focus includes: Respecting the privacy of our guests, e.g. by securely storing their personal information, and avoiding discrimination between them. In addition, we do our best to ensure that our business policy is conducted with respect to our guests, without trying to promote any religious or nationalistic ideology.

2.3 Community Policy

GOLDEN Hotels & Resorts Group is committed to helping preserve the traditions and values of the local community in which it operates, as well as to contribute to the development of neighboring businesses. For this reason, we have developed a communication policy with local institutions and businesses, which applies to all our business activities, so that we can cooperate in harmony, with the ultimate goal of a sustainable and profitable relationship.

The role of GOLDEN Hotels & Resorts is not limited to the provision of tourism services but ensures that its activities benefit and support issues that contribute to the development of society.

GOLDEN Hotels & Resorts cooperates with apprenticeship schools and gives students the opportunity to do practical training in hotel departments. At the same time, it ensures that the majority of the staff working in the hotels come from the local community of Heraklion.

Our hotels first consider local businesses to purchase products, and generally prefer products that are produced on our island in all aspects of our operations.

In order to help associations and institutions, GOLDEN Hotels & Resorts offer equipment, furniture and clothing that are not used due to renovations.

We also recommend our customers to choose local mini markets, restaurants, and local car rentals.

2.4 Quality Assurance Policy

If there is a human activity, a social institution that brings together people, this certainly is tourism. This peacemaker institution is for GOLDEN Hotels & Resorts a social and economic factor for development and independence.

GOLDEN Hotels & Resorts' goal is to ensure that our guests will enjoy a high-quality experience. To ensure that we will achieve this, we have implemented precise procedures that our staff strictly adhere to.

For the implementation of the Quality Assurance Policy, GOLDEN Hotels & Resorts ensure that:

- ◆ Each employee is responsible for the quality of his work
- ◆ Each supervisor is responsible for the quality of his department
- ◆ All employees are informed of the Quality Assurance Procedures and of the Food Safety System
- ◆ All the necessary means and resources are provided, in order to achieve the quality objectives
- ◆ All control measures are analyzed and used as part of continuous quality improvement

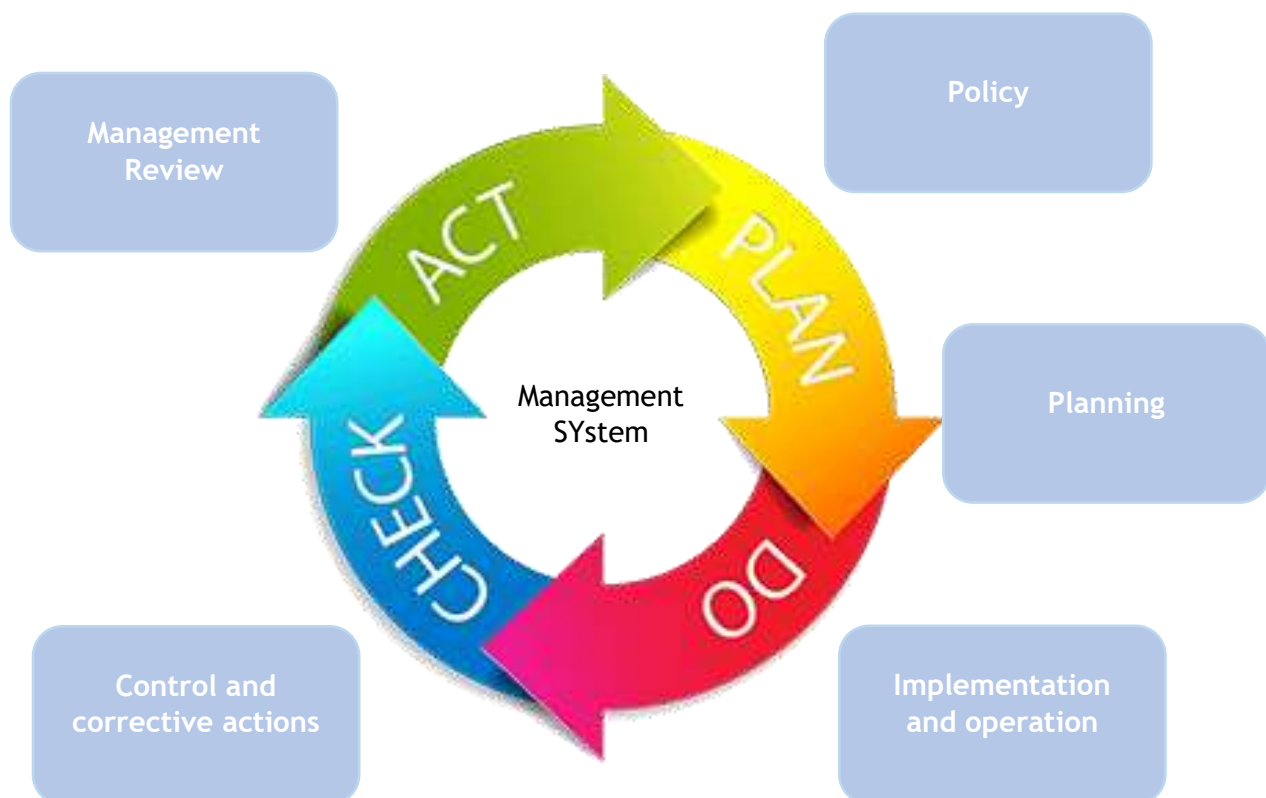
The Quality Assurance Policy is the pinnacle of the Quality Assurance System in order to achieve the hotels' objectives. Within the Quality Assurance Policy, the management of the hotel has set specific quality objectives which are:

- ◆ Endless effort for the complete and continuous satisfaction as a result of the offered services and products
- ◆ Our guests are treated with dignity and full of professionalism
- ◆ Extensive training of our staff members.
- ◆ Continuous improvement of our services and the quality of our products
- ◆ Ensuring a comfortable and peaceful accommodation for our guests
- ◆ Create a warm atmosphere at the arrival of our guests with essentials friendliness and understanding of their needs
- ◆ Direct and willing response to the demands of our customers
- ◆ Maintaining the best performance of our equipment and premises

3. Brief Description of the System

The scope of the environmental management system covers all activities of the hotel.

The whole system follows the steps of the dynamic circular process, which is represented in the following diagram:



The Environmental Management System (EMS) includes the following documents:

- * Operation manual
- * Environmental Review
- * EMS Procedures - Instructions, which describe the sequence of actions, the allocation of responsibilities and the corresponding documents
- * EMS Files - Forms and Documents and all legislative texts or regulations etc.

- * Work instructions for pollution prevention

For the efficient operation of the EMS, continuous attention is given so that the equipment used and the control means are appropriate, while human resources is trained on the responsibilities, duties and tasks required to implement, with particular emphasis on environmental protection, prevention of pollution and generally the sustainable operation of the hotel.

4. Description of Environmental Aspects

4.1 General

The INSULA ALBA Resort & Spa hotel has proceeded with the preparation of a project for the identification of all the environmental aspects and impacts of its activities have been identified. In particular, all activities within the scope of the environmental management system have been taken into consideration, such as customer stays, the operation of the hotel departments (offices, warehouses, kitchen, maintenance, bar, restaurant etc.).

For all these activities, the environmental aspects have been identified, namely the element that can interact with the environment, and their environmental impacts, which is the change in the environment (positive or negative) caused by the environmental aspects.

Subsequently, through a defined methodology, all identified environmental aspects have been evaluated in order to define the important ones, for which environmental improvement targets will be determined.

4.2 Determination of Environmental Aspects

For each activity of the hotel, the interactions with the environment are identified.

The environmental aspects are examined for all activities of the hotel and are grouped by environmental issue in the form Recording and Evaluation of Environmental Aspects (e.g., consumption of natural resources, liquid waste, solid waste etc.).

4.2.1 Water consumption

The water sourcing and disposal is handled exclusively by the local authority.

4.2.2 Energy consumption

4.2.2.1 Electricity consumption

The electricity comes from the grid of a Private Electricity Company and it is used for the operation of the entire hotel, such as rooms, pumping stations, kitchens, public areas, etc.

4.2.2.2 Diesel consumption

Diesel consumption has to do with the generator operation (which is set into operation in case of power failure).

4.2.2.3 Gas consumption

The hotel uses gas for cooking and portable heating.

4.2.3 Consumption of chemicals

The chemicals used in the hotel have to do with the:

- * Maintenance of swimming pools
- * Cleaning the rooms and the public areas
- * Cleaning the kitchen and restaurants

The quantities are recorded per type on a monthly basis, while dosing pumps are also used in the food departments. All cleaning chemicals used in the food departments and the housekeeping department are environmentally friendly.

4.2.4 Solid Waste

The solid waste of the company is classified into the following categories:

SOLID WASTE	CHARACTERIZATION	ORIGIN	MANAGEMENT
Paper, Cardboard, Newspapers, Magazines, Brochures etc.	Non-hazardous	<ul style="list-style-type: none"> • Offices • Warehouses • Kitchen • Public spaces 	Collection in the recycling bins
Cardboard boxes / carton packaging	Non-hazardous	<ul style="list-style-type: none"> • Warehouses • Kitchen 	
Plastic packaging	Non-hazardous	<ul style="list-style-type: none"> • Warehouses • Kitchen 	
Nylon packaging	Non-hazardous	<ul style="list-style-type: none"> • Warehouses • Kitchen 	
Electronic equipment	Depends on the type and the substances they contain	<ul style="list-style-type: none"> • Offices • Warehouses • Maintenance • Rooms • Kitchen • Public spaces 	Storage and use for spare parts. Collection and disposal for recycling (Creta Eco Phoenix, Fotokyklosi SA)
Portable batteries	Hazardous	<ul style="list-style-type: none"> • Offices • Maintenance • Rooms 	Collection in special containers and collected by the company AFIS SA
Lamps	Hazardous	<ul style="list-style-type: none"> • Offices • Warehouses • Maintenance • Rooms • Kitchen 	Collection in special bins and collected by

		<ul style="list-style-type: none"> • Public spaces 	the company Fotokyklosi SA
Garden waste	Non-hazardous	<ul style="list-style-type: none"> • Gardens, Green spaces 	Composting
Organic waste of food departments	Non-hazardous	<ul style="list-style-type: none"> • F&B Department 	Disposal in the waste bins of the Municipality of Hersonisos
Metals	Non-hazardous	<ul style="list-style-type: none"> • Offices • Warehouses • Maintenance • Rooms • Kitchen • Public spaces 	Collection by partner Kokkalis Scrap.
Glass	Non-hazardous	<ul style="list-style-type: none"> • Offices • Warehouses • Maintenance • Rooms • Kitchen • Public spaces 	Collected in special bins and disposed by the Municipality.

Table 4.2.1: Classification of Solid Waste

4.2.5 Liquid waste

Cooking oils resulting from the food departments are collected by the company Michalelis.

4.2.6 Waste gases / Pollutants

Waste gases that result or can result from hotel activities have to do with the various types of air conditioning systems, the use of detergents, the use of the generator in emergency situation and the maintenance of the building.

4.2.7 Nuisance (Noise, Vibrations)

The hotel has machinery/equipment and hosts events, which cause nuisance, which, though, is restricted within the boundaries of its facilities. Until today, the hotel has not received any complaints regarding increased noise levels or vibrations, while according to the environmental noise measurements, the

values never exceed the legal requirements of the GG 61/D'/1988 and the hotel ETS.

4.3 Evaluation of Environmental Aspects

The environmental aspects of the company are classified according to their importance in three categories:

Negligible - Medium - High Significance. The ranking is based on the following four criteria:

- * **Legal requirement:** This criterion relates to the existence or not of specific Greek or EU legislation, regulation or directive in combination with the compliance or non-compliance by the company. The evaluation of the company activities based on legal provisions and regulations is processed upon, the legislative basis that has been prepared in accordance with the Procedure of Determination and Monitoring of Legislative and other Requirements PD 04.1.
- * **Significance of Impact:** This criterion relates to the significance and the magnitude of the environmental load.
- * **Occurrence Probability/Frequency of the Impact:** refers to the probability that the environmental impact results from activities or conditions of high, medium, low or negligible occurrence.
- * **Interest of Bodies:** This criterion relates to the impact that the activities of the company have to the employees, the local community and the management of the company.

The rating of the criteria is presented with full details in Table 4.3.1:

Impact Description	Rating	Comments
SIGNIFICANCE		
Environmental Impact of High Significance	5	Severe Environmental Impact
Environmental Impact of Medium Significance	4	Medium Size Environmental Impact
Environmental Impact of Low Significance	3	Small Environmental Impact
Unobservable Environmental Impact	2	Negligible Environmental Impact
Unobservable Environmental Impact	1	Zero Environmental Impact
PROBABILITY OF OCCURRENCE		
Continuous or very frequent Occurrence of the Impact	5	Environmental Impact resulting from Activities or Routine Conditions
Frequent Occurrence of the Impact	4	Environmental Impact resulting from Activities of High Occurrence Probability

No frequent Occurrence of the Impact	3	Environmental Impact resulting from Activities of Medium Occurrence Probability
Rare Occurrence of the Impact	2	Environmental Impact resulting from Activities of Small Occurrence Probability
Almost Zero Occurrence of the Impact	1	Environmental Impact resulting from Activities occurring very rarely
INTEREST OF BODIES		
Existence of particular interest from a Body	3	-
Existence of interest from a Body	2	-
No existence of interest from a Body	1	-
ENVIRONMENTAL LEGISLATION		
There is a connection of the Environmental Impact with a Legal Regulation	5	Relates to the Environmental Aspects /Impacts that are directly connected with Legislation
There is no connection of the Environmental Impact with a Legal Regulation	0	

Table 4.3.1: Detailed Rating of Criteria

Then, after the individual scores of all criteria are summed up, the Significance of the Environmental Aspects is determined based on their sum. The Significance Degree is determined based on Table 4.3.2.

Significance Ranking of Environmental Impact		
Significance	Ranking	Addressing the Impact
3 to 7	Negligible - Low Significance	No Action
8 to 14	Medium Significance	Long-term addressing of the Impact
15 to 18	High Significance	Medium-term addressing of the Impact

Table 4.3.2: Ranking of Environmental Aspects based on the sum of the Scores of individual criteria

Based on the above, the Head of Environmental Management classifies the Environmental Aspects in the way they arise from the activities of the company, depending on their significance, records the results in the form EMF01.1-1 and in collaboration with the Administration proceeds to the determination of the Environmental Objectives and Targets and the design and implementation of the Environmental Programs.

When an environmental aspect is evaluated as of «High Significance» and «Medium Significance», then an improvement target of the environmental aspect should be defined, as well as the control measures (environmental management plan) to achieve the target. For each measure, the timetable (depending on the impact significance), the person responsible and the implementation means should be defined.

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
SOLID WASTE	<p>RECEPTION - BOOKINGS: Office consumables - paper consumption for the intercommunication between the departments, supplies, bookings printing and hotel advertising leaflets.</p> <p>HOUSEKEEPING: Sanitary waste of the customers, personal care products waste (shampoo, shower gel, etc.), room flyers</p> <p>FOOD DEPARTMENTS - BARS: Organic food waste during the production and after the consumption. Packaging material waste of food and beverages (glass, plastic, aluminum, paper). Disposable drinks and refreshments are used in a small percentage mainly including tonic, spirits and wine.</p> <p>MAINTENANCE: Waste production from the equipment to be replaced (lamps,</p>	3	5	3	5	16	High Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	refrigerators, fire extinguishers, generator batteries). WAREHOUSE: Materials, food and drinks, cleaning materials packaging waste. GARDENS: Production of green waste. Waste production from packaging materials. BUILDINGS MAINTENANCE - NEW CONSTRUCTIONS: The produced waste during the annual maintenance of the buildings e.g. debris, old equipment						
	<p style="text-align: center;"><u>ELECTRICITY:</u></p> RECEPTION - BOOKINGS: Consumption of electricity for office uses (computers, photocopier), cooling system and lighting.		5	2	0	11	Medium Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
ENERGY	<p>HOUSEKEEPING - LAUNDRY: Consumption of electricity for room air conditioning. Water heating is mainly done with heat pumps. Electricity consumption for lighting the rooms. Electricity consumption for washing the sheets and towels by the partner company.</p> <p>FOOD DEPARTMENTS - BARS: Consumption of electricity for air conditioning in restaurants, for lighting, cooking (ovens) & refrigerators.</p> <p>MAINTENANCE: Consumption of electricity for the operation of the mechanical equipment</p> <p>WAREHOUSE: Consumption of electricity for lighting & operation of the refrigerators.</p>	4					
			3	1	5	12	Medium Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	<p>GARDENS: Consumption of electricity for outdoor lighting of gardens</p> <p>DESALINATION PLANT: Electricity for the operation of the plant</p>	3					
	<p style="text-align: center;"><u>DIESEL:</u></p> <p>MEANS OF TRANSPORTATION: Vehicle use: - for transportation of the staff within the hotel. - for activities within the hotel (for operational needs of kitchens, housekeeping, gardens)</p> <p>GENERATOR: Use in case of power failure</p>	3	5	1	5	14	Medium Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	<u>GAS:</u> FOOD DEPARTMENTS - BARS: Use in the kitchens of the departments for the preparation of meals						
WASTE GASES	<p>HOUSEKEEPING - LAUNDRY: Emission of air pollutants due to the use of detergents.</p> <p>FOOD DEPARTMENTS - BARS: Emission of air pollutants from cleaning fluids. Air pollution from the use of furnaces in cooking. The kitchens use gas fuel.</p> <p>MAINTENANCE: Emissions of suspended particles and pollutants every time the generator is set in the operation mode to check its operation.</p>	4	4	1	5	14	Medium Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	<p>Emissions of suspended particles every time the generator is set in the operation mode (emergency situation). Repair or air conditioning units, freon leak to the atmosphere.</p> <p>MEANS OF TRANSPORTATION: Air pollution by automobile exhaust gases: - for transportation of the staff within the hotel. - for the activities within the hotel (for operational needs of kitchens, housekeeping, gardens) - for transportation of customers from the lobby to the rooms upon arrival.</p> <p>BUILDINGS MAINTENANCE - NEW CONSTRUCTIONS: Air pollution by fumes from dyes or other substances used for the buildings maintenance by the</p>						

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	maintenance department or by external partners.						
WASTE WATER	<p>HOUSEKEEPING - LAUNDRY: Wastewater from the cleaning activities of the housekeeping department. Sewage from customers hygiene</p> <p>FOOD DEPARTMENTS - BARS: Production of fats and oils.</p> <p>SPORTS: Wastewater leakage (benzene or petrol) by the high speed crafts of the diving school</p> <p>MEANS OF TRANSPORTATION: Mineral oils, oils, batteries, equipment residuals from maintenance</p>	5	3	3	5	16	High Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
WATERS	<p>HOUSEKEEPING - LAUNDRY: Water consumption for: room cleaning, washing of streets and public spaces</p> <p>FOOD DEPARTMENTS - BARS: Consumption of potable water and water for washing.</p> <p>MAINTENANCE: Water consumption for daily and annual winter maintenance. Water consumption for the operation of pools. Water usage from licensed wells</p> <p>GARDENS: Water consumption for irrigation of gardens and courts.</p>	3	5	1	0	9	Medium Significance
CHEMICAL SUBSTANCES	<p>HOUSEKEEPING - LAUNDRY: Consumption of chemical substances for cleaning the public spaces and the rooms</p> <p>FOOD DEPARTMENTS - BARS: Use of chemical substances for cleaning the departments</p>	3	5	1	5	14	Medium Significance

RECORDING AND EVALUATION OF ENVIRONMENTAL ASPECTS

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF THE ENVIRONMENTAL ASPECT</i>	<i>EVALUATION CRITERIA</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
	<p>MAINTENANCE: Consumption of chemical substances during the maintenance procedure of machinery and equipment, and for the maintenance of the swimming pools</p> <p>GARDENS: Consumption of chemicals for the care of gardens</p> <p>DESALINATION PLANT: Use of chemical substances for the operation of the unit</p>						

IN CASE OF EMERGENCY SITUATIONS:

- Fire, Earthquake

<i>ENVIRONMENTAL ASPECT</i>	<i>DESCRIPTION OF ENVIRONMENTAL ASPECT</i>	<i>IMPACT ASSESSMENT</i>				<i>TOTAL</i>	<i>SIGNIFICANCE RANKING</i>
		<i>SIGNIFICANCE</i>	<i>POSSIBILITY OF OCCURRENCE</i>	<i>INTEREST OF BODIES</i>	<i>LEGISLATION</i>		
WASTE GASES	Air pollution by fumes from burnt materials or gas leakage.	5	2	3	0	10	Medium Significance
LIQUID WASTE	Leakage of oils, petrol or liquid fuel.	4	1	3	0	8	Medium Significance
FLORA	Destruction of natural environment.	4	2	3	0	9	Medium Significance

5. Environmental Objectives and Targets

5.1 Determination of Environmental Objectives and Targets

The Administration, in collaboration with the Head of Environmental Management during the scheduled annual review, examines the Environmental Performance of the previous season and the Evaluation of the Environmental Aspects. Afterwards, in consideration of the environmental policy of the company, the significance of the environmental aspects and the objections of the interested parties, the Head of Environmental Management sets out the Environmental Objectives and Targets, which are submitted for approval by the Administration of the company.

In order to achieve the environmental objectives and targets, plans of Environmental Programs are drafted by the Head of Environmental Management, in collaboration with the Administration, and where necessary with the Implementation Officers of Environmental Programs. In each Environmental Program, the target, the objective, the implementation time, the undertaken tasks, the monitoring indicators and the person responsible for development and implementation are defined.

The development of the particular actions, with the target to implement the monitoring system of the environmental aspects affected by the activities of the company and the objective to implement the environmental programs, are determined through procedures, which include instructions for the environmental management of the following environmental aspects:

- * Solid waste management
- * Energy management
- * Waste gases management
- * Liquid waste management
- * Water management
- * Chemical substances management
- * Nuisance

Within the scope of Environmental Management Programs, the hotel has concluded contracts and is collaborating with the following licensed waste management and materials recycling companies:

- * AFIS S.A.

- * FOTOKYKLOSI S.A.
- * MUNICIPALITY OF HERSONISOS
- * MICHAELIS
- * KOKKALIS SCRAP
- * KATHERIS SCRAP

The environmental objectives and the suggested targets are recorded by the Head of Environment in the form “Environmental Management Program”

5.2 Implementation Planning

The Head of Environment, in collaboration with the Administration and the Heads of the hotel departments, drafts the Environmental Management Program (AET D02.1-1). In this, the environmental aspects, the environmental objectives, the environmental targets, the actions for achieving the targets, the indicators for each target, the persons responsible for monitoring and the timetable, are listed.

The Head of Environment informs the persons responsible for the implementation for their responsibilities.

The Head for Environment is informed for the implementation progress of the objectives and targets (compliance with timetable and physical scope) by the respective person responsible for the implementation. The monitoring frequency of the progress is defined according to the significance of the related impact.

When emergency measures to accelerate the achievement of some targets are considered necessary, these measures are taken after the approval of the General Manager. At the same time, the Environmental Management Program is revised by the Head of Environment.

Review and revision of the Environmental Management Program by the Head of Environment also takes place during the inspections of the Management System.

In the case of occurrence of new data (change of the production equipment, services, etc.), there is the need to establish new objectives and targets. In this case, the activation of the steps of the present Procedure is required.

5.3 Environmental Performance Indicators

After the collection of the required data, the INSULA ALBA RESORT & SPA monitors the following Environmental Performance Indicators.

Type	Consumption pg/pn	
	2023	2022
Electricity	15,86 kwh	16,8 kwh
Diesel	0,017 kwh	0,019 kwh
Gas	0,19 kwh	0,1 kwh
Environmentally Hazardous Substances - Maintenance Use	0,3 kg	0,3 kg
Environmentally Hazardous Substances - Housekeeping Use	0,1 kg	0,1 kg
Environmentally Hazardous Substances - F&B Use	0,1 kg	0,1 kg
Water	0,31 m ³	0,3 m ³
High Emission Food - Meat	0,29 kg	0,3 kg
High Emission Food - Fish	0,10 kg	0,10 kg
High Emission Food - Dairy	0,43 kg	0,45 kg
Single-use plastics	4,2 pieces	4,5 pieces

Table 5.3.1: Environmental Performance 2023-2022

ENVIRONMENTAL MANAGEMENT PROGRAM

ENVIRONMENTAL ASPECTS	OBJECTIVE	TARGET (2024)	ACTIONS	INDICATORS	PERSON RESPONSIBLE FOR MONITORING	MONITORING / MEASUREMENT
ENERGY	Control of electricity consumption	15,8 kwh pg/pn	1) Staff training 2) Use of energy saving lamps	Kwh pg/pn electricity	Head of Environment Head of Technical Department Head of Housekeeping Department	April - October
	Control of gas consumption	0,19 kwh pg/pn	1) Staff training 2) Maintenance of the gas detection system	Kwh pg/pn gas	Head of Environment Head of Technical Department	April - October
	Control of diesel consumption	0,017 kwh pg/pn	1) Staff training 2) Maintenance of hot water boilers	Kwh pg/pn petrol	Head of Environment Head of Technical Department	April - October
WATER	Control of water consumption	0,31 m ³ pg/pn	1) Recording the consumption on a daily basis 2) Staff training	m ³ pg/pn water	Head of Maintenance Head of Housekeeping Department	April - October
	Control of consumption of pool chemical substances	0,3 kg pg/pn	1) Staff training 2) Suppliers included in a list of approved suppliers	Kg pg/pn chemical substances	Head of Environment Head of Technical Department	April - October

CHEMICAL SUBSTANCES			3) Environmentally friendly cleansers, where possible			
	Control of consumption of chemical substances for the food departments	0,1 kg pg/pn	1) Staff training 2) Suppliers included in a list of approved suppliers 3) Environmentally friendly cleansers, where possible	Kg pg/pn chemical substances	Head of Environment Head of Technical Department	April - October
	Control of consumption of housekeeping chemical substances	0,1 kg pg/pn	1) Staff training 2) Suppliers included in a list of approved suppliers 3) Environmentally friendly cleansers, where possible	Kg pg/pn chemical substances	Head of Environment Head of Technical Department	April - October
HIGH EMISSION FOOD	Control of meat consumption	0,24 kg	Selection of more vegetarian dishes	Kg pg/pn	Head of Supplies Department	April - October
	Control of fish consumption	0,08 kg	Selection of more vegetarian dishes	Kg pg/pn	Head of Supplies Department	April - October
	Control of dairy consumption	0,4 kg	Quantity preservation	Kg pg/pn	Head of Supplies Department	April - October
SINGLE USE PLASTICS	Control of supplies	4,2 pieces	Quantity preservation	Pieces pg/pn	Head of Supplies Department	April - October

6. Compliance with legislation

The company uses various sources of information to identify the relevant laws and regulations. These sources can be:

- * databases
- * communication with public bodies
- * consultants

The Head of Environment monitors these sources of information in a regular basis and properly fills the form «Sources of information» (AET 04.1-1).

If it is necessary, external sources of information (consultants) can be used to help the Head of Environment to identify the relevant laws and regulations or to develop programs to meet their requirements.

From all the information (legislation, requirements, municipal decisions, etc.), an evaluation takes place regarding the points that directly concern the hotel complex INSULA ALBA RESORT & SPA and must be implemented.

The Head of Environment informs the supervisors, who are involved with the relevant legislation and regulations, concerning the impacts of the activities of the enterprise on the environment.

To manage the documents collected during the present procedure, the legislative requirements are recorded in the form «List of Legislative Requirements », AMP 04.1-2).

7. Incidents

There were no incidents of environmental nature during the reporting period.

8. Corporate Social Responsibility

Society

The INSULA ALBA RESORT & SPA concern for the society in which it operates is a commitment that is demonstrated by its actions.

The company's policy is to invest mainly in long-term projects rather than individual, short-term actions. The benefits of this policy are numerous and substantial: it establishes stable partnerships with non-profit organisations and bodies, enabling them to plan their work over time. In this way, the company can also plan and invest in projects and infrastructure that leave long-term results and utility behind.

The company's investment in Corporate Responsibility activities for the year 2023 amounted to 2.500 €. The goal for next season is to increase donations by 20%.

Social Solidarity

Concern and care for people and the development of social solidarity actions and the mitigation of social exclusion phenomena are at the heart of the company's interest.

INSULA ALBA RESORT & SPA has expressed its commitment to supporting vulnerable groups and fighting social exclusion. In this context, it consistently supports the work of recognised charitable institutions and social solidarity associations every year. Among the associations supported by the company in 2023 is The smile of the child.

Culture - Support for local cultural operators

INSULA ALBA RESORT & SPA believes that Culture is a strategic, comparative advantage of Greek Tourism, but also a measure of quality for the development of each place. For this reason, one of the main axes of action of the company, within the framework of Corporate Social Responsibility, is its contribution to the protection and promotion of the Greek cultural

heritage, the support of contemporary artistic creation and cultural decentralization.

The INSULA ALBA RESORT & SPA invests in long-term programs of support, promotion and promotion of cultural heritage, locally and nationwide, which leave tangible work behind.

Human Resources

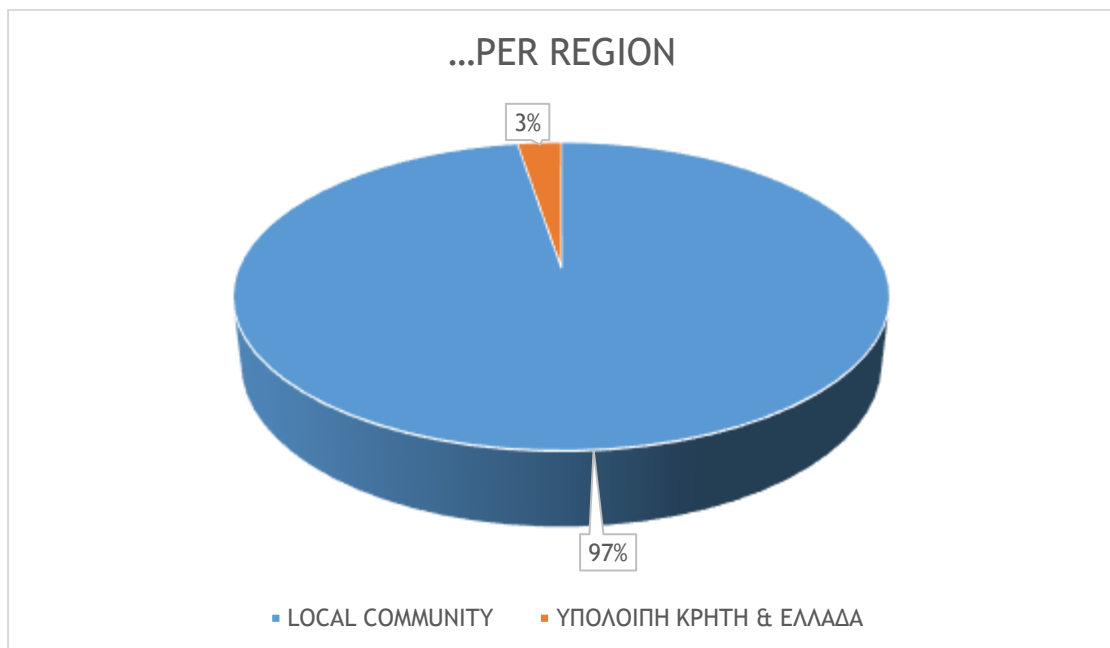
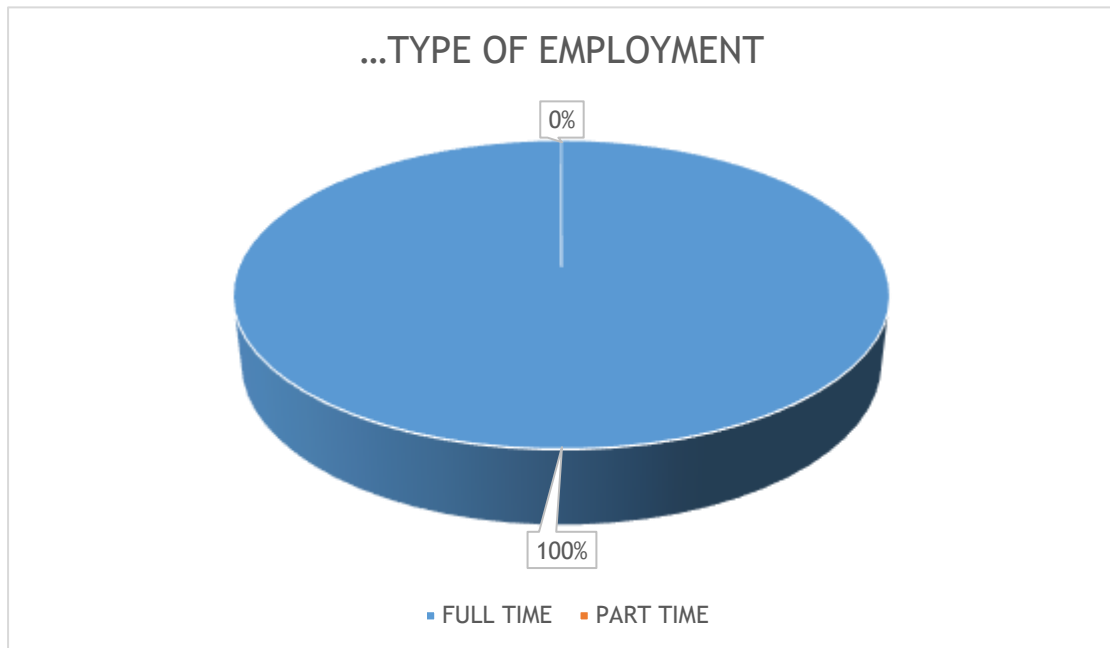
The skills, dedication and daily efforts of employees are a key factor in the efficiency, growth and sustainability of the company.

Recognizing the value of its human capital, the company invests in its proper management and development through merit-based systems, such as equal opportunity policy and merit-based advancement, performance evaluation system, training, procedures for the safety and health of employees, as well as practical moral and material rewards for their efforts.

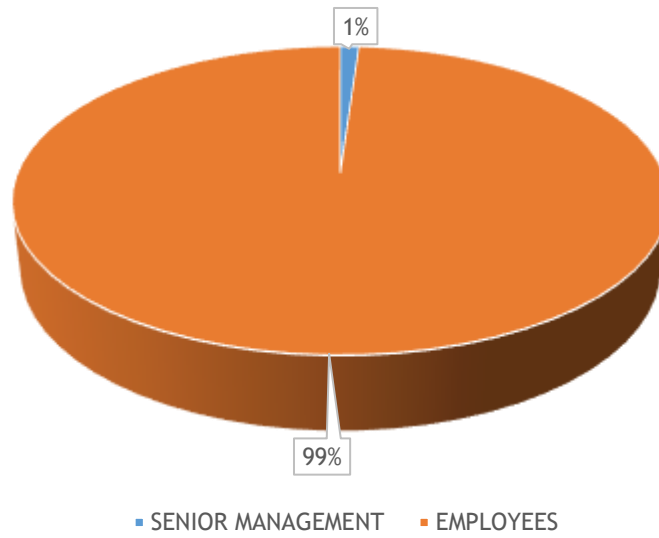
The main priority for the company, especially in a period of severe crisis, is to ensure the viability of the company and, by extension, of its employees.

Employees Details

Analysis of Employees 2023

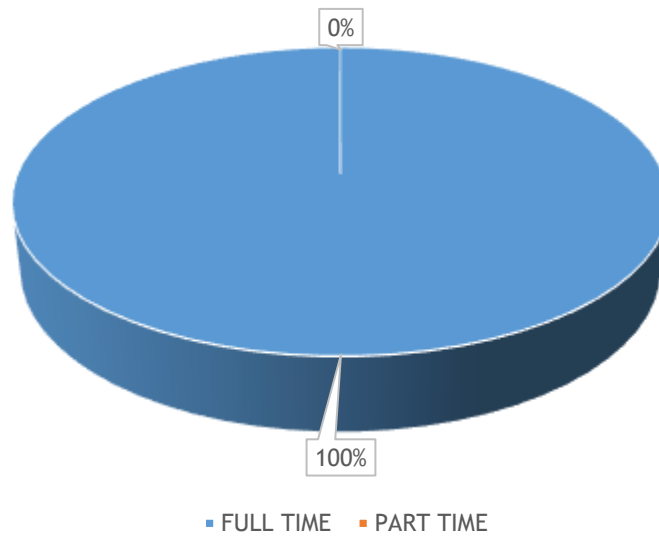


...EMPLOYMENT CATEGORY

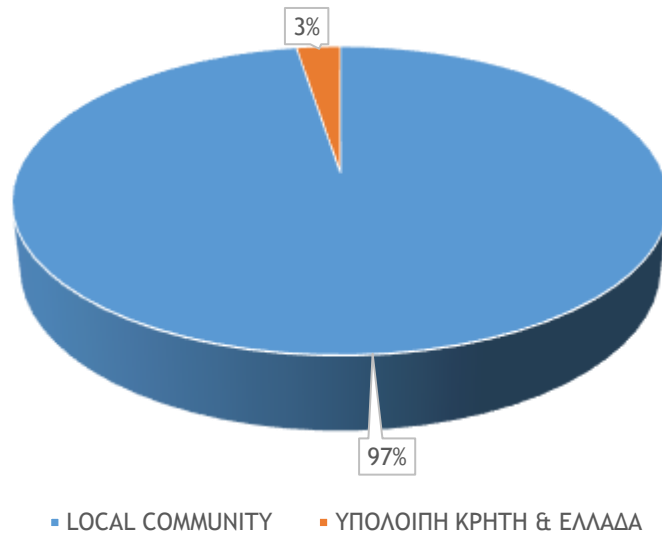


Employee Analysis 2022

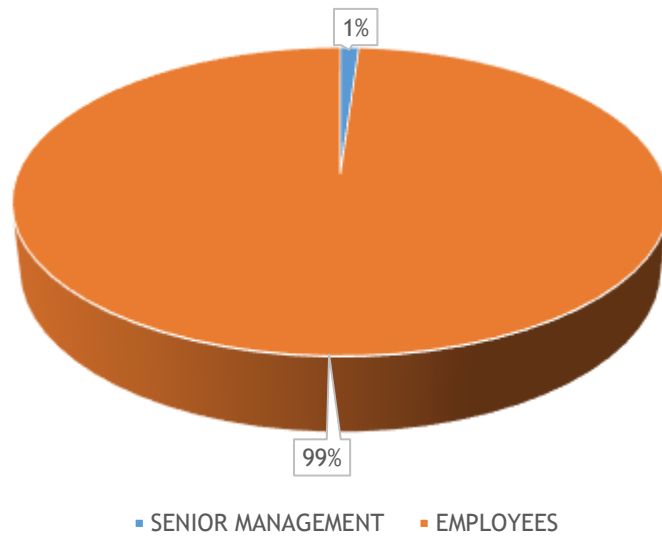
...TYPE OF EMPLOYMENT



...PER REGION



...EMPLOYMENT CATEGORY



Safety and Health at Work

The first priority for INSULA ALBA RESORT & SPA is to ensure a working environment with the highest standards of Health and Safety. The hotel has a Safety Technician and an Occupational Physician. The company has made significant investments to improve the health and safety in every workplace, and all employees have participated in health and safety training programs.

Equal Opportunities

The company does not allow any kind of discrimination related to nationality, race, gender, religion, age, sexual preference, marital status, disability, political or philosophical beliefs and membership of trade unions.

INSULA ALBA RESORT & SPA uses meritocratic criteria for the selection and promotion of its staff on the basis of equal opportunities and irrespective of gender, age category or other categories of diversity. The company applies a merit-based system of staff evaluation and promotion, which allows for the recognition, selection and best possible use of each employee's potential.

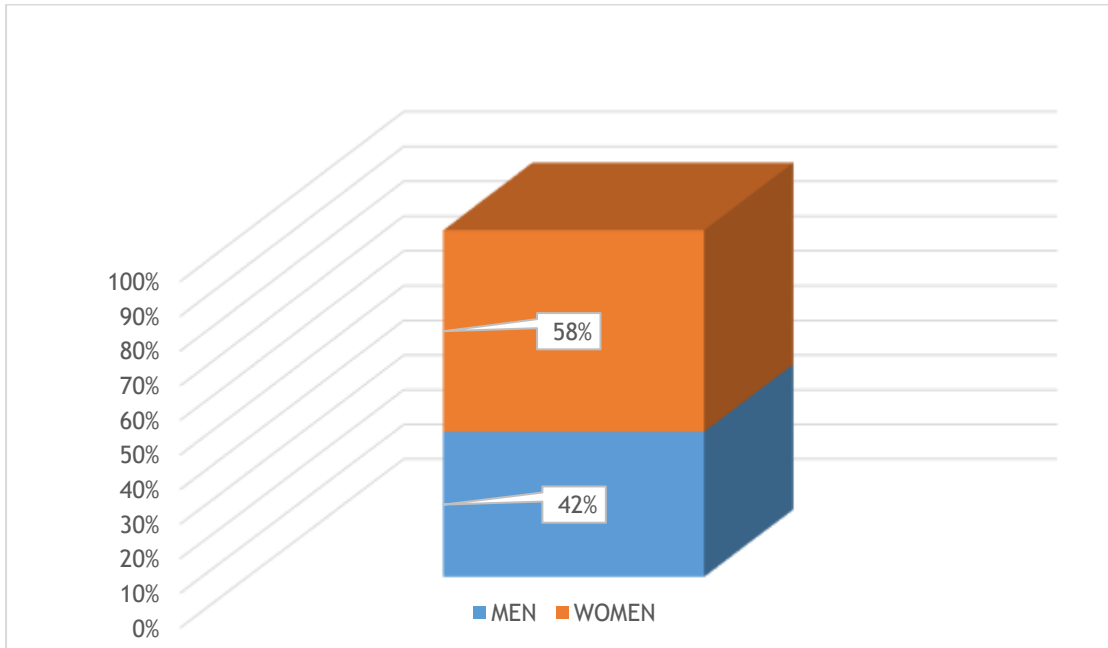
Positions of responsibility are filled on a priority basis through promotions and transfers of existing staff. The company will search the external labour market if the positions are not filled internally due to a lack of qualified knowledge or experience.

The percentage of women in the company's total workforce is significant, as is the percentage of women in positions of extended responsibility (senior and middle management) in the company.

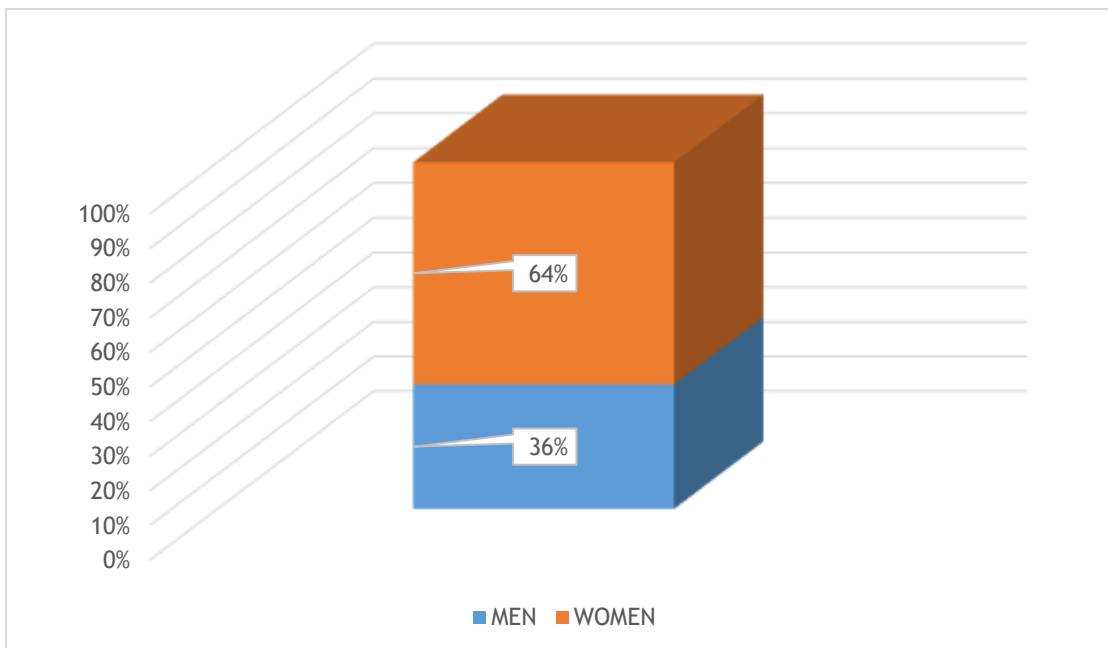
INSULA ALBA RESORT & SPA respects the diversity of each employee and no incidents of discrimination have been reported in the company's workplace.

In addition, all of the company's security personnel have received formal training on company policies and procedures, including Human Rights and Life Safety and First Aid issues. The company condemns all forms of forced or child labour and requires its suppliers and subcontractors to conduct themselves in the same manner.

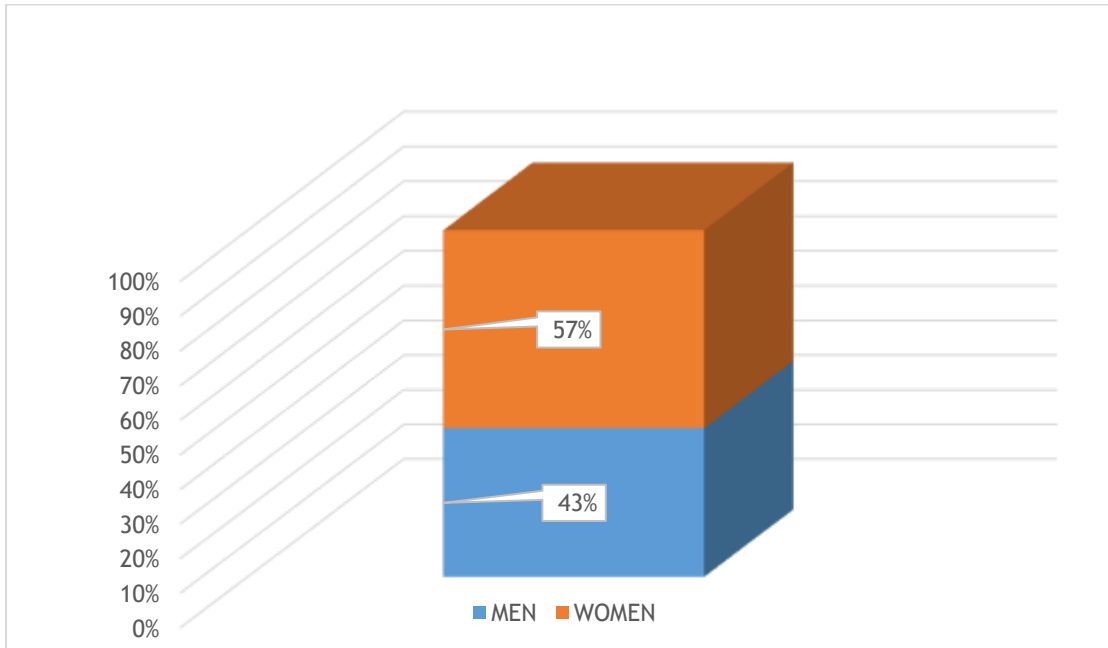
Analysis of Employees by Gender 2023



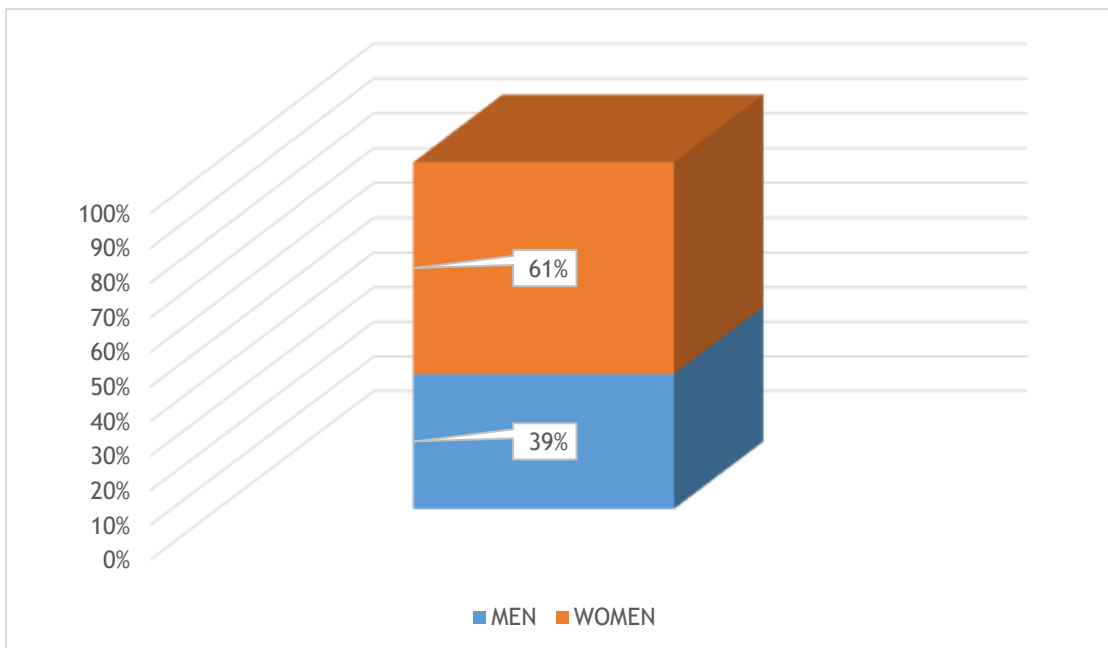
Analysis of Employees by Gender in Positions of Extended Responsibility 2023



Analysis of Employees by Gender 2022



Analysis of Employees by Gender in Positions of Extended Responsibility 2022



Additional Benefits

Since the beginning of its operation, the INSULA ALBA RESORT & SPA offers all its employees a series of benefits, aiming to improve the quality of their working life, as well as their professional and personal development.

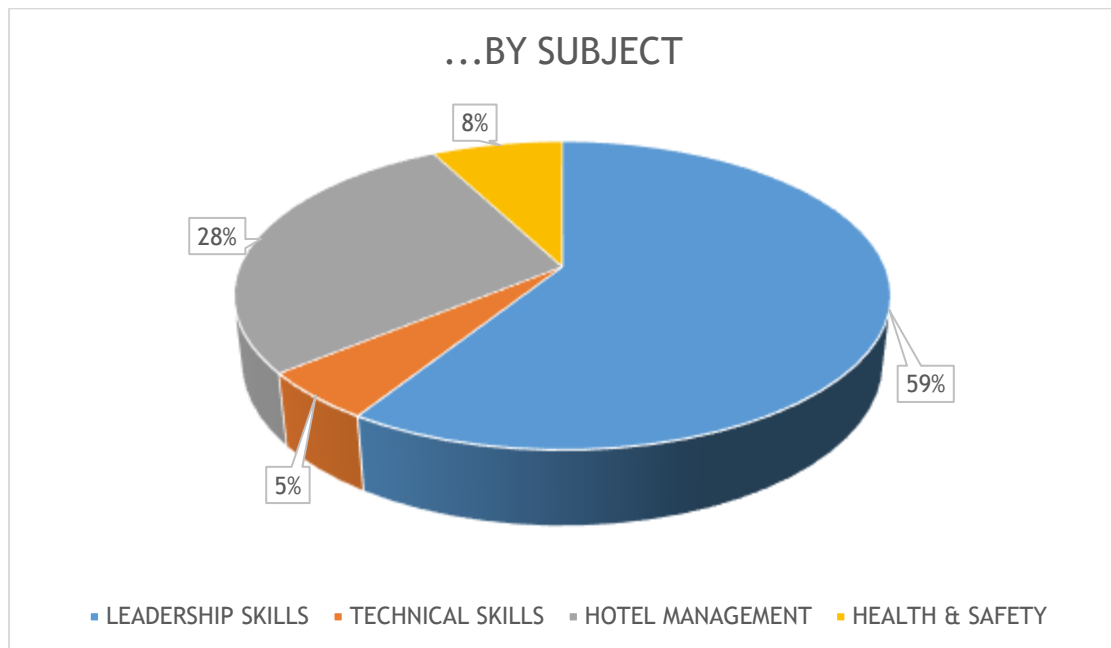
- Free meals in the staff restaurant, free drinks in the break area
- Annual employee reward trip
- Reward all department heads through participation in the annual Hotel Chamber Managers' Ball
- Flexible leave and shift scheduling schemes to support employees' family and personal needs
- Continuous development of employee knowledge and skills through in-house training and development programmes
- Providing facilities for staff where required

Education

The education and training of its employees is a constant objective of the INSULA ALBA Resort & Spa. In addition to the acquisition of knowledge in the field of work, the company's programs also aim to develop skills such as interpersonal communication, positive attitude, customer service orientation, flexibility and adaptability, teamwork and cooperation. The company's training and education program in 2023 was mainly focused on technical knowledge in the workplace, leadership skill development, health and safety, etc. The goal for the next season is to maintain the number of training hours and the variety of topics.

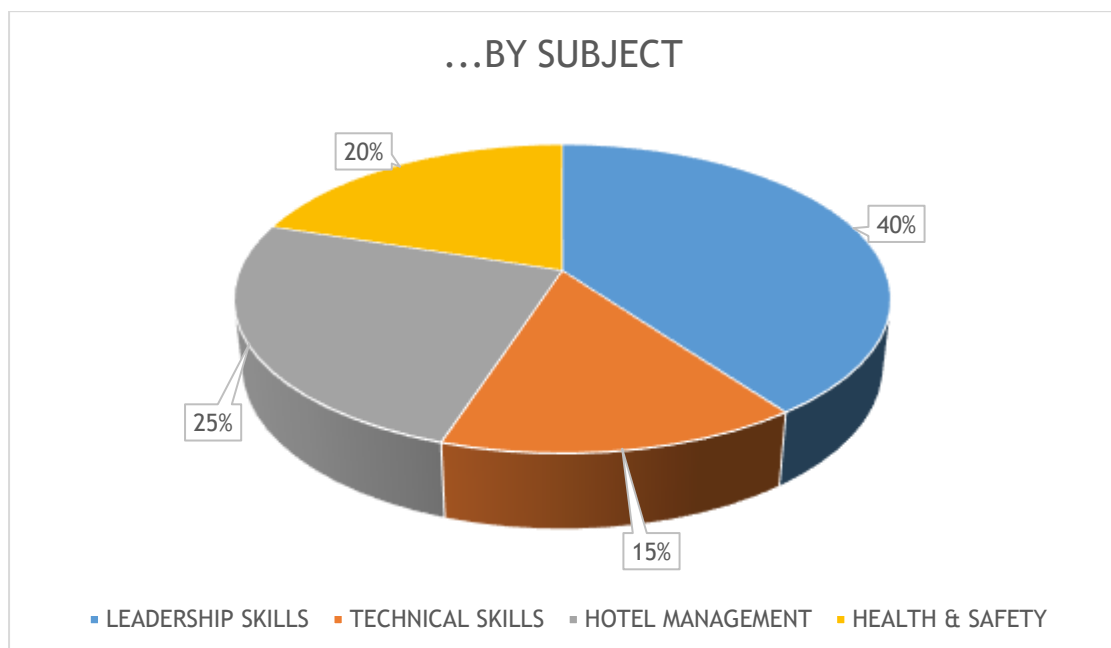
Training Hours Analysis 2023

(Total training hours: 35)



Training Hours Analysis 2022

(Total training hours: 25)



Two-way communication

INSULA ALBA RESORT & SPA adopts initiatives and practices aimed at open and two-way communication, enhancing dialogue and mutual understanding with its employees.

- Interdepartmental and interdepartmental meetings are held on a regular basis, through which employees are informed about issues concerning both their work and the company and the industry in general.
- The company's firm "open door" policy makes it easier for employees to discuss issues of concern to them at any time, addressing any level of the corporate hierarchy.
- Open meetings were held between management and all staff to provide information on important issues, strategy, objectives, challenges and the company's progress

8. Contact details

In the context of open dialogue and communication with the interested parties and in general with the public, we provide below our contact details.

INSULA ALBA RESORT & SPA

Analipsi Hersonissou

70014, Heraklion, Crete, Greece

info@insulaalba.com

+30 2897 501 501