

Sustainability Policy

1. Sustainability statement

At Atlas Hotels, we are committed to operating responsibly and sustainably, protecting our planet, supporting our employees and strengthening the communities in which we operate. Our sustainability approach is brought together through Atlas Cares, our internal sustainability programme, which focuses on four key pillars: Wellbeing, Community, Environment, and Diversity, Equality & Inclusion (DE&I).

We recognise that sustainability is not a separate activity, but part of how we run our hotels, support our people, work with suppliers, make decisions, manage risk and communicate with our stakeholders. Our ambition is to keep learning, improving and embedding responsible business practices across our business, while being transparent about our progress and the areas where we still have more to do.

Through Atlas Cares, we aim to make a positive difference for our guests, employees, local communities, suppliers and investors. Our approach is aligned to the themes of climate, environment, social impact, governance and diversity and inclusion, and is supported by the FuturePlus sustainability platform, which helps us measure, manage and communicate our sustainability performance.

2. Purpose of this policy

The purpose of this policy is to set out the overarching framework for how Atlas Hotels embeds sustainability across its business. It supports our wider suite of sustainability-related policies, procedures and practices and provides a clear statement of our commitments across climate, environment and social impact.

This policy is intended to:

- Define our responsibilities as an environmentally and socially responsible business.
- Explain how sustainability is embedded into our operations, governance, decision-making and stakeholder engagement.
- Provide a framework for monitoring progress, reporting performance and driving continuous improvement.
- Support our Atlas Cares strategy and the delivery of our annual sustainability goals.
- Help employees, managers, suppliers and partners understand the role they play in supporting our sustainability ambitions.

Sustainability is an evolving area, and we recognise that our approach must continue to adapt in response to legislation, regulation, industry expectations, stakeholder feedback and operational learning.

3. Scope

This policy applies to:

- All Atlas Hotels employees, including those working in hotels or our Leicester office.
- All hotels and offices operated or managed by Atlas Hotels.
- Contractors, consultants and agency workers acting on behalf of Atlas Hotels.

- Suppliers and business partners, where their activities may have an environmental, social or governance impact connected to our operations.

The policy covers our approach to climate and carbon emissions; energy, water, paper and resource use; waste management and recycling; responsible procurement and supplier standards; biodiversity and avoidance of negative environmental impacts; employee wellbeing, engagement, inclusion and development; community contribution and charitable partnerships; and governance, measurement, reporting and continuous improvement.

4. Governance and leadership

Sustainability at Atlas Hotels is led through our Atlas Cares framework, with activity organised around the core pillars of Wellbeing, Community, Environment and DE&I. Each pillar is supported by an Atlas Hotels Director (Pillar Lead) and employee teams (Pillar teams/contributors) who help drive plans, actions and progress across the business. Our ESG lead (People Director) is responsible for ensuring appropriate governance and focus exists across the Atlas Hotels business in relation to our Atlas Cares strategy.

Our governance approach is designed to ensure that sustainability is considered at both strategic and operational level. We have strong ESG oversight and publish annual impact reporting and updated supplier standards to support ethical and transparent decision making across the business.

The Atlas Cares governance and communication structure includes the following:

- Monthly contact between the Atlas Hotels ESG Lead and a representative of Future Plus
- Quarterly Pillar Lead progress review meeting, chaired by our ESG lead and attended by a representative from Future Plus alongside all Pillar Leads.
- Half yearly review meetings (All Hands), chaired by our ESG lead and attended by all Pillar Leads, all Pillar contributors and a representative of Future Plus
- Production of an annual Impact Report, providing an overview of plans and achievements year to year relating to the Atlas Cares' strategy
- A quarterly Atlas Cares newsletter that is sent out to all employees internally

This governance and communication strategy supports collaboration between pillar leads and teams, with objectives to create cohesion across ESG workstreams, review progress, plan goals and operate in a joined up way.

The Board and senior leadership are responsible for ensuring that sustainability is taken into account in relevant business decisions, risk management, investment planning and governance discussions. Sustainability priorities and progress will be reviewed regularly, and this policy will be reviewed at least annually.

5. Climate commitments

We recognise that climate change is a significant global issue and that businesses have a role to play in reducing greenhouse gas emissions and improving climate resilience.

We are committed to measuring, managing and reducing the climate impact of our operations. This includes monitoring energy consumption, reviewing emissions, identifying opportunities to reduce energy demand and considering investment in lower-carbon technologies where practical and commercially appropriate.

Our environmental approach includes reducing energy, water and waste across our properties, and identifying new ways to make guest stays more eco-friendly.

We will continue to:

- Monitor energy usage across our estate.

- Seek opportunities to reduce greenhouse gas emissions.
- Review the feasibility of renewable energy and energy efficiency projects.
- Consider climate-related risks and opportunities as part of operational and investment decisions.
- Use available data and reporting platforms to track progress over time.

6. Environmental commitments

We are committed to reducing the environmental impact of our operations by using resources responsibly, reducing waste, improving recycling and seeking opportunities to create positive environmental outcomes.

Our environmental focus includes the responsible management of water, waste and energy, which are key areas for reduction across our estate.

6.1 Energy and utilities

We will monitor and review utility consumption, including electricity, gas and water, and use this data to identify opportunities for improvement. Our approach includes monitoring how we assess and reduce resource usage, improve resource efficiency and improve the sustainability of supply.

Our 2026 targets include reducing electricity consumption per guest year-on-year and continuing to explore renewable energy opportunities, including Solar PV at trial sites.

6.2 Waste and recycling

We will manage waste in a way that supports regulatory compliance, reduces environmental harm and promotes efficient use of resources. Our approach includes waste management principles, procedures, waste streams, reporting arrangements, single-use plastic commitments and waste targets.

Our goals include increasing the percentage of waste recycled year-on-year, supported by waste audits through our waste contractor. Our ongoing environmental priorities include measuring and managing waste and recycling in hotels and the Leicester office, as well as focusing on reducing the use of single-use plastics within our hotels.

6.3 Water and paper

We will continue to monitor and manage water and paper consumption, using available data to identify opportunities to reduce unnecessary use. Our goals include reducing year-over-year paper consumption and continuing to manage water use across the estate.

6.4 Guest and hotel sustainability initiatives

We will continue to support hotel-level sustainability initiatives that encourage responsible guest behaviour and operational efficiency. Our Holiday Inn and Holiday Inn Express hotels participate in the IHG Green Engage system. Our Hampton by Hilton hotels are part of Hilton LightStay, aligned with Hilton Travel with Purpose 2030 goals.

7. Biodiversity and environmental impact

We will seek to understand and manage the direct and indirect environmental impacts of our activities, including resource consumption, pollution, waste generation and impacts on local habitats and biodiversity.

Where we identify potential negative environmental impacts, we will consider appropriate mitigation actions. We will also consider opportunities for positive environmental impact, including conservation, resource efficiency, renewable energy adoption, responsible sourcing, employee education and partnerships that support environmental causes.

8. Social commitments

We recognise that our people are central to the success and sustainability of our business. As a hospitality business built on human connection, employee wellbeing, inclusion, engagement and development are essential to building a resilient and responsible organisation.

Our social commitments are delivered through the Atlas Cares pillars of Wellbeing, Community and Diversity, Equality & Inclusion, and are supported by our wider people policies, employee engagement mechanisms, training activity and community partnerships.

8.1 Workforce, wellbeing and engagement

We are committed to creating a rewarding place to work, where employees feel recognised, supported and able to develop. Reward at Atlas is about more than pay; it is about being recognised, valued and developed in role.

We will continue to support employee wellbeing through awareness, training, signposting and access to support. This includes Mental Health First Aiders, counselling and legal support through HSF, and resources to help employees navigate life's challenges.

Our wellbeing goals include analysing and understanding wellbeing needs, building capability, strengthening support and communication, embedding wellbeing into culture, and tracking activity and outcomes to demonstrate improvement and guide future focus.

8.2 Diversity, Equality and Inclusion

We are committed to creating a diverse, equal and inclusive workplace. We want to represent the communities we operate in and attract and retain people from all walks of life.

We are a Disability Confident Committed Employer and will continue to review and improve our recruitment and employment practices to support accessibility, inclusion and equity.

Our DE&I goals include strengthening Disability Confident activity, reviewing employee experience and inclusion data, delivering inclusive leadership and inclusive recruitment training, developing social mobility activity, and reviewing pay gap data across the wider estate.

8.3 Community impact

We are committed to contributing positively to the communities around our hotels and central office. Our community activity includes charity partnerships, local initiatives, employability partnerships and donated hotel stays.

Our community activity includes continuing charity partnerships with Mind and SAMH while expanding support for local initiatives, including work experience and placement programmes with partners such as Springboard and Shaw Trust.

Our community goals include fundraising for charity partners, providing donated room nights for full-time carers, supporting community activity hours, seeking additional community funding, offering employment-related opportunities to partner candidates and increasing work experience at Atlas.

9. Ethical and sustainable procurement

We expect our suppliers and business partners to share our commitment to ethical, responsible and sustainable business practices.

Our Supplier Code of Conduct supports ethical and transparent decision-making across the business. We continue to review and strengthen supplier standards, include them in new supplier onboarding and seek confirmation of acceptance from existing suppliers where required.

We will:

- Communicate our environmental, social and ethical expectations to suppliers.
- Include sustainability considerations in relevant procurement and tender activity.
- Review supplier compliance with our Supplier Code of Conduct.
- Prioritise stronger sustainability credentials where this is the only differentiator between suppliers.
- Continue to develop our approach to supply chain risk, human rights and environmental standards.

10. Monitoring, measurement and reporting

We will monitor and measure sustainability indicators to understand performance, identify risks, track progress and support improvement. This includes, where relevant, energy and water consumption, waste generation, carbon emissions, employee wellbeing activity, engagement, inclusion metrics and community impact.

We use Future Plus to help measure, manage and communicate sustainability performance and growth, and to help validate our ESG efforts. We also use impact reporting and internal updates to communicate progress, achievements and priorities.

We will continue to:

- Maintain relevant sustainability data and evidence.
- Review progress against Atlas Cares goals and FuturePlus ambitions.
- Report progress through Impact Reports, internal updates and relevant stakeholder communications.
- Use data to identify areas for improvement and inform future objectives.
- Review and update evidence to support certification, reporting and stakeholder requests.

11. Continuous improvement

We recognise that sustainability challenges, legislation, stakeholder expectations and best practice are constantly changing. Continuous improvement is therefore central to this policy.

Our approach will be to:

- Set realistic annual goals through our Atlas Cares strategy and work with FuturePlus.
- Review progress regularly through pillar meetings and governance discussions.
- Learn from data, audits, stakeholder feedback and operational insight.
- Encourage employee participation and ideas through Atlas Cares, the Employee Forum and internal communications.
- Adapt our approach as legislation, regulation and best practice evolve.

- Be transparent about both progress and areas where further work is needed.

12. Employee involvement and communication

Sustainability belongs to everyone at Atlas Hotels. We encourage employees to take part in sustainability initiatives, share ideas, support local activity and raise suggestions through appropriate channels.

We will continue to communicate sustainability priorities and progress through channels such as Atlas Cares updates, our quarterly ESG newsletter, our monthly employee newsletter- The Check In, The Globe, Employee Forum updates, manager communications, conferences and business updates, impact reports and external stakeholder materials.

13. Roles and responsibilities

Board and Senior Leadership: responsible for ensuring that sustainability is considered in strategic decision-making, governance, risk management and business planning. They are also responsible for supporting the resources, oversight and accountability required to deliver our sustainability commitments.

Sustainability / Atlas Cares Lead (People Director): responsible for coordinating the overall sustainability strategy, supporting pillar leads, maintaining oversight of progress, ensuring evidence is updated and supporting sustainability reporting.

Pillar Leads: responsible for developing and progressing activity within their areas of focus, reviewing progress against agreed goals, engaging their teams and reporting updates through the agreed governance structure.

Pillar Teams/Contributors: working to support the objectives of their Pillar Team and Lead. Identifying opportunities for improvement and suggesting additional objectives to be considered under the Atlas Cares workstream.

Managers: responsible for helping embed sustainability into day-to-day operations, supporting employee involvement, encouraging responsible use of resources and ensuring relevant policies and procedures are followed.

Employees: encouraged to support Atlas Cares, use resources responsibly, contribute ideas, take part in relevant initiatives and raise concerns or suggestions through the appropriate channels.

Suppliers and Business Partners: expected to act in line with the standards set out in our Supplier Code of Conduct and to support our environmental, social and ethical expectations where relevant to the goods or services they provide.

14. Related policies and documents

This Sustainability Policy should be read alongside relevant Atlas Hotels policies, procedures and documents, including but not limited to:

- Supplier Code of Conduct.
- Equal Opportunities and Harassment Policy.
- Whistleblowing Policy.
- Anti-Bribery and Corruption Policy.
- Gender Pay Gap Report.
- Annual Impact Report.
- Health, safety and wellbeing policies.
- Relevant procurement, waste, utilities and operational procedures.

15. Review

This policy will be reviewed annually, or sooner where required by changes in legislation, regulation, business priorities, stakeholder expectations or the Atlas Cares strategy.

The review will consider:

- Progress against Atlas Cares goals.
- Updates to FuturePlus ambitions and evidence requirements.
- Changes in environmental, social or governance legislation.
- Data from sustainability monitoring and reporting.
- Feedback from employees, guests, suppliers and stakeholders.
- Lessons learned from audits, assessments and operational experience.