



# LOUIS PLC

## Sustainability Statement

2024

Following implementation of the CSRD (Corporate Sustainability Reporting Directive) under ESRS (European Sustainability Reporting Standards), Louis PLC is committed to its reporting responsibilities and has prepared its 2024 Sustainability Report.

## Table of Contents

|                                                                                                                  |    |
|------------------------------------------------------------------------------------------------------------------|----|
| Introduction .....                                                                                               | 5  |
| Letter from the Chairman .....                                                                                   | 6  |
| Group's Key Highlights.....                                                                                      | 7  |
| Our Group .....                                                                                                  | 7  |
| Our History .....                                                                                                | 7  |
| Our Vision, Purpose and Value.....                                                                               | 8  |
| Our Vision .....                                                                                                 | 8  |
| Our Purpose.....                                                                                                 | 8  |
| Our Values.....                                                                                                  | 9  |
| General Disclosures .....                                                                                        | 10 |
| BP-1.....                                                                                                        | 10 |
| Basis for preparation .....                                                                                      | 10 |
| BP-2 .....                                                                                                       | 12 |
| Disclosures in relation to specific circumstances .....                                                          | 12 |
| GOV-1 .....                                                                                                      | 13 |
| Sustainability Governance .....                                                                                  | 13 |
| GOV-2.....                                                                                                       | 16 |
| Sustainability Matters Addressed by the undertaking's administrative,<br>management and supervisory bodies ..... | 16 |
| GOV-3.....                                                                                                       | 16 |
| Incentive Schemes.....                                                                                           | 16 |
| GOV-4.....                                                                                                       | 17 |
| Due Diligence .....                                                                                              | 17 |
| GOV-5.....                                                                                                       | 18 |
| Risk Management .....                                                                                            | 18 |
| SBM-1 .....                                                                                                      | 18 |
| Strategy, Business Model, and Value Chain .....                                                                  | 18 |
| SBM-2.....                                                                                                       | 20 |
| Interests and Views of Stakeholders .....                                                                        | 20 |
| SBM-3, IRO-1 & IRO-2.....                                                                                        | 23 |
| Understanding the value chain.....                                                                               | 23 |
| Identifying Impacts, Risks and Opportunities .....                                                               | 23 |
| Assessing Impacts, Risks and Opportunities .....                                                                 | 24 |

|                                                                                            |    |
|--------------------------------------------------------------------------------------------|----|
| External Stakeholder Engagement .....                                                      | 26 |
| Assumptions .....                                                                          | 26 |
| Validation and Approval .....                                                              | 26 |
| Disclosure requirements in ESRS covered by the undertaking's sustainability statement..... | 28 |
| Environment .....                                                                          | 34 |
| Climate Change .....                                                                       | 34 |
| E1.IRO-1 .....                                                                             | 34 |
| E1-1 & E1-3 .....                                                                          | 35 |
| E1-2 .....                                                                                 | 36 |
| E1-4 .....                                                                                 | 37 |
| E1-5 .....                                                                                 | 37 |
| E1-6 .....                                                                                 | 38 |
| EU Taxonomy of Sustainable Activities Report .....                                         | 40 |
| Introduction.....                                                                          | 40 |
| Main Results.....                                                                          | 41 |
| Water and Marine Resources .....                                                           | 51 |
| E3.IRO-1 .....                                                                             | 51 |
| E3-1 .....                                                                                 | 52 |
| E3-2 .....                                                                                 | 52 |
| E3-3 .....                                                                                 | 53 |
| E3-4 .....                                                                                 | 53 |
| Biodiversity and Ecosystems .....                                                          | 54 |
| E4.SBM-3 .....                                                                             | 54 |
| E4.IRO-1 .....                                                                             | 54 |
| E4-2 .....                                                                                 | 55 |
| E4-3 .....                                                                                 | 55 |
| E4-4 .....                                                                                 | 56 |
| E4-5 .....                                                                                 | 56 |
| Circular Economy .....                                                                     | 57 |
| E5.IRO-1 .....                                                                             | 57 |
| E5-1 .....                                                                                 | 58 |
| E5-2 .....                                                                                 | 58 |
| E5-3 .....                                                                                 | 59 |

|                                                                    |    |
|--------------------------------------------------------------------|----|
| E5-5 .....                                                         | 60 |
| Social.....                                                        | 62 |
| Own Workforce .....                                                | 62 |
| S1.SBM-3 .....                                                     | 62 |
| S1-1 .....                                                         | 63 |
| S1-4 .....                                                         | 68 |
| S1-5 .....                                                         | 71 |
| S1-6 .....                                                         | 72 |
| S1-7 .....                                                         | 73 |
| S1-8 .....                                                         | 73 |
| S1-13.....                                                         | 74 |
| S1-14.....                                                         | 74 |
| S1-17.....                                                         | 75 |
| <i>Incidents, complaints and severe human rights impacts</i> ..... | 75 |
| Affected Communities .....                                         | 76 |
| S3.SBM-3 .....                                                     | 76 |
| S3-1 .....                                                         | 77 |
| S3-2 .....                                                         | 77 |
| S3-4 .....                                                         | 78 |
| S3-5 .....                                                         | 79 |
| Consumers and End-Users .....                                      | 80 |
| S4.SBM-3 .....                                                     | 80 |
| S4-1 .....                                                         | 81 |
| S4-2 .....                                                         | 81 |
| S4-3 .....                                                         | 82 |
| S4-4 .....                                                         | 82 |
| S4-5 .....                                                         | 83 |
| Governance .....                                                   | 84 |
| Business Conduct .....                                             | 84 |
| G1.GOV-1 .....                                                     | 84 |
| G1-IRO-1 .....                                                     | 84 |
| G1-1 .....                                                         | 85 |
| G1-4.....                                                          | 87 |
| General Disclosures Index .....                                    | 89 |

|                                  |    |
|----------------------------------|----|
| IRO 2 .....                      | 89 |
| EU Legislation Data Points ..... | 89 |

## Introduction

At Louis PLC, sustainability is an integral part of our corporate vision, driving responsible growth and long-term resilience. While complying with the NFRD, we have incorporated certain reporting principles which arose from the Corporate Sustainability Reporting Directive (CSRD), on a voluntary basis for the first time in 2024, which has strengthened our reporting practices to ensure greater transparency, accountability and alignment with evolving regulatory expectations. The European Sustainability Reporting Standards (ESRS) provide a standardized framework for companies to disclose their environmental, social and governance (ESG) performance, fostering comparability across industries.

Over the years, we have taken significant steps to enhance our sustainability governance, risk management, and stakeholder engagement. Through structured data collection and improved reporting methodologies, we are embedding sustainability deeper into our business strategy.

A core component of our reporting is the Double Materiality Analysis (DMA), which enables us to evaluate sustainability impacts, risks and opportunities (IROs) across our operations and value chain. By identifying material ESG topics, we can focus our resources towards those areas, mitigate risks, enhance resilience, and capitalize on opportunities that drive sustainable business growth.

*\*Read more about the Double Materiality in IRO-1, IRO-2 and SBM-3 sections of this report*

## Letter from the Chairman

Dear Valued Stakeholders,

In 2024, Louis PLC reaffirmed its dedication to sustainable tourism, operational excellence, and responsible business practices. Amid an evolving global landscape, we navigated challenges with resilience and adaptability, reinforcing our role as a leading force in the Mediterranean tourism industry. Throughout the year, we remained steadfast in delivering exceptional experiences while embedding sustainability at the heart of our strategy.

Despite geopolitical and economic uncertainties, our commitment to sustainability has only strengthened. In 2024, we made significant strides in aligning our operations with the requirements set out by the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) on a voluntary basis, while complying with the NFRD. This framework marks a new era of transparency, accountability and responsible business conduct, solidifying our commitment to improving our environmental, social, and governance (ESG) performance. Sustainability is not merely a responsibility—it is a catalyst for innovation, long-term value creation and a competitive advantage in an increasingly conscientious global market.

Recognizing the growing expectations from investors, guests and regulatory bodies for greater environmental and social accountability, we have positioned sustainability as a key driver of our corporate strategy. Our commitment to responsible business conduct underscores our pledge to measurable impact and ethical governance, ensuring we not only meet but exceed evolving industry standards.

This commitment to higher reporting standards and ESG transparency reflects our dedication to responsible leadership. Embracing this regulatory shift allows us to enhance our risk management practices, drive sustainable decision-making, and align with global expectations for corporate responsibility.

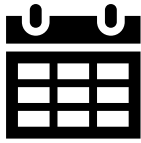
As we look ahead, our focus remains on scaling our sustainability efforts, deepening stakeholder engagement, and harnessing innovation to generate long-term value. Through collaboration, forward-thinking leadership and a shared commitment to sustainability, we aim to set new benchmarks for sustainable tourism in the Mediterranean and beyond.

On behalf of Louis PLC, I extend my sincere gratitude to our employees, partners and stakeholders for their unwavering trust and support. Together, we will continue shaping a more sustainable, resilient and responsible future for the tourism industry.

.....

Costakis Loizou  
Chairman  
Louis PLC

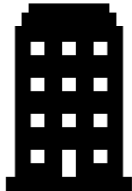
## Group's Key Highlights



***89 years of  
experience in  
the tourism  
sector***



***30 awards  
received in  
2024***



***26 Hotels and  
Villas in  
Cyprus and  
Greece***



***>2000  
personnel***



***0 incidents  
of  
corruption***



***100% of  
procurement  
budget  
spent on  
local  
suppliers***

## Our Company

### Our History

Louis PLC has been a key player in the Mediterranean tourism industry since its establishment in Nicosia in 1998. On April 2, 1999, the Group's Board of Directors took the strategic decision to transform Louis PLC into a listed entity. By August 1999, Louis PLC was successfully listed on the Cyprus Stock Exchange, setting the foundation for its future growth and success.

#### *Louis Hotels*

Louis Hotels, a pioneer in the hotel industry in Cyprus and Greece, traces its roots back to the early 1940s as part of the Louis Group. Founded by the late Louis Loizou—widely regarded as the “father of tourism” in Cyprus—Louis Hotels laid the groundwork for modern tourism in the region. The journey began with the acquisition of the “Semmering” Hotel in the Troodos mountains, followed by the “Grand Hotel” in Platres and the iconic Louis Hotel on Ledra Street in Nicosia. By 1969, Louis Hotels had acquired the Ledra Palace Hotel, a landmark in the capital.



In the following decades, the Group expanded its portfolio to include numerous properties across Cyprus and Greece, developing a strong reputation for high-quality hospitality and exceptional guest experiences. Major acquisitions included hotels in Chania, Corfu, Zakynthos, Mykonos, and Rhodes.

In 2024, Louis Hotels operated a portfolio of 26 four- and five-star hotel and villa units in Cyprus and the Greek islands, combining a rich heritage with modern innovation.

With a legacy of nearly 90 years and an eye on the future, Louis Hotels remains committed to sustainable growth, continuous improvement, and creating memorable guest experiences. By combining tradition with innovation, Louis Hotels continues to shape the tourism landscape in Cyprus and Greece, enhancing the region's appeal as a top-tier holiday destination.



## Our Vision, Purpose and Value

### Our Vision

Our vision is to further establish the Louis Group as a leading tourism organization in the Southeast Mediterranean, providing the highest possible service quality to our clients and partners and improve our tourism products and services in the countries where we operate. We aim to strengthen and enrich our strategic alliances with international markets by strengthening our ties with international tour operators in the hotel sector as well as in other areas of the Group's activity.

### Our Purpose

We constantly aim to create happy and memorable holiday memories our guests will cherish for a lifetime.

## Our Values

In order to have happy clients, we must first have happy employees that share our work ethic and values such as being honest, respectful, reliable, humble, kind, authentic, innovative and passionate.

## Awards and Initiatives

| Hotel               | Award Received                                                                   | Awarded By             |
|---------------------|----------------------------------------------------------------------------------|------------------------|
| Asterion            | Digital Award TRA                                                                | Booking.com            |
| Infinity Blu        | TUI Global Hotel Award                                                           | TUI Global Hotel Award |
| King Jason Protaras | TUI Global Hotel Award                                                           | TUI Global Hotel Award |
| Chris Le Mare Gold  | Traveller Review Award                                                           | Booking.com            |
| Infinity Blu        | TUI Blue                                                                         | TUI                    |
| Royal Apollonia     | Green Key Award                                                                  |                        |
| The Ivi Mare        | Green Key Award                                                                  |                        |
| Louis Althea        | Green Key Award                                                                  |                        |
| Royal Apollonia     | TUI Global Quality Hotel Award                                                   | TUI                    |
| Kerkyra Blue        | TUI Global Quality Hotel Award                                                   | TUI                    |
| King Jason Paphos   | TUI Global Quality Hotel Award                                                   | TUI                    |
| Nausicaa Beach      | TUI Blue                                                                         | TUI                    |
| Breeze              | Travel Life Certification                                                        | Travel Gold Life       |
| St. Elias           | BA Excellence award                                                              | BA                     |
| Royal Apollonia     | BA Excellence award                                                              | BA                     |
| Ivi Mare            | BA Excellence award                                                              | BA                     |
| Ivi Mare            | JET2 Quality Awards 2023*                                                        | JET2                   |
| Royal Apollonia     | JET2 Quality Awards 2023*                                                        | JET2                   |
| ST. Elias           | JET2 Quality Awards 2023*                                                        | JET2                   |
| Royal Apollonia     | Traveler's Choice Award : Among the top 10% of hotels worldwide                  | Trip Advisor           |
| Ivi Mare            | Traveler's Choice Award: Best luxury hotels in Europe (only 1 hotel from Cyprus) | Trip Advisor           |
| Louis Phaethon      | Traveler's Choice Award: Best All-Inclusive Resorts in Europe                    | Trip Advisor           |
| Kerkyra Blue        | Traveler's Choice Award: Best All-inclusive Resorts In Greece (no 7 out of 10)   | Trip Advisor           |
| Asterion            | Traveler's Choice Award: Best Luxury hotels in Greece (no. 11 out of 25)         | Trip Advisor           |

|                       |                                                                                                                                       |                                                                                                                                        |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Asterion              | Traveler's Choice Award: Amongst the top 1% of hotels worldwide                                                                       | Trip Advisor                                                                                                                           |
| Once in Mykonos       | Traveler's Choice Award: Among the top 10% of hotels worldwide                                                                        | Trip Advisor                                                                                                                           |
| Althea beach          | Cleaning                                                                                                                              | TUI BLU STAR BRONZE                                                                                                                    |
| Althea beach          | Hotel Staff Service                                                                                                                   | TUI BLU STAR SILVER                                                                                                                    |
| Althea beach          | Food & Drink                                                                                                                          | TUI BLU STAR GOLD                                                                                                                      |
| Asterion Spa & Suites | Lifestyle Magazine Readers Travel Awards 2024 (Asterion: Best Beach/Coastal Hotel & Best Spa/Wellness Hotel & Best Hotel for Romance) | Lifestyle Magazine Readers Travel Awards 2024 (Asterion : Best Beach/Coastal Hotel & Best Spa/Wellness Hotel & Best Hotel for Romance) |

*\*Awards concerning 2023 were received in 2024 and were not included in the previous sustainability report*

As part of our sustainability strategy, we participate in collaborative initiatives and have received external recognition relevant to our sustainability performance.

In 2024, Asterion Suites & Spa, a property under our management, was shortlisted for the “Best Hotel for Sustainability” award, by the readers of Luxury Lifestyle Magazine. This recognition reflects the implementation of measures aimed at improving resource efficiency, reducing waste generation, and minimizing the environmental impact of our operations, particularly in relation to energy use, water management, and guest services.

As part of our commitment to sustainable tourism, we have also participated in the TUI Foundation’s "Make Our Sand and Seas Plastic-Free" campaign, an initiative focused on reducing plastic waste in coastal areas. Our involvement includes actions to phase out single-use plastics across relevant operations and engagement with local stakeholders to support awareness campaigns and promote behavioural change aimed at reducing plastic pollution.

## General Disclosures

The General Disclosures section presents the foundation of Louis PLC’s ESG reporting framework, aligned with the principles of the ESRS. This section provides insights into the basis of preparation, governance, strategy and IRO management.

### BP-1

#### Basis for preparation

This Sustainability Statement has been prepared in accordance with the CSRD and the ESRS. It provides a consolidated view of Louis PLC’s Environmental, Social and Governance (ESG) impacts, risks and opportunities, covering upstream and downstream activities within the Group’s value chain.

The report is prepared following the financial consolidation of Louis PLC and includes disclosures for all active subsidiaries, with exceptions outlined below (please refer to Table 1 Note 1). The information presented in this report is based on all the operations of Louis Public Company Ltd (“the Company”) for 2024.

This report applies the double materiality principle, evaluating sustainability matters from the impact perspective, the financial perspective or both.

Louis PLC has previously reported sustainability data with reference to the GRI Standards and in alignment with the UN Sustainable Development Goals (SDGs). The transition to ESRS ensures a more comprehensive and structured approach to sustainability disclosures.

The hotels, villas, restaurants and head offices as per Table 1 below are listed under the company, however, please note the following:

*Sofianna Resort, Nausicaa Beach Luxury Villas, Chris Le Mare Luxury Villa and Chris Le Mare Gold Luxury Villa, Lora Pearl Villa, King Jason Protaras, King Jason Paphos, Amada Colossos Resort, King Jason Zante, Louis Infinity Blu and Louis Apostolata Island Resort are not included in the data collection, as the terms of their management contracts differ.*

Table 1

| <b>Cyprus</b>                                      | <b>Greece</b>                                |
|----------------------------------------------------|----------------------------------------------|
| 1. Louis Paphos Breeze, Paphos                     | 1. Asterion Suites & Spa, Chania             |
| 2. Louis Phaethon Beach, Paphos                    | 2. Mykonos Theoxenia                         |
| 3. Louis Imperial Beach, Paphos                    | 3. Once in Mykonos                           |
| 4. Louis Ledra Beach, Paphos                       | 4. Louis Ionian Sun, Corfu                   |
| 5. The King Jason Paphos, Paphos                   | 5. Kerkyra Blue Hotel N’ Spa, Corfu          |
| 6. The Ivi Mare, Paphos                            | 6. Amada Colossos Resort, Rhodes             |
| 7. Polis 1907, Polis Chrysochous and Akakiko Polis | 7. Louis Apostolata Island Resort, Kefalonia |
| 8. Sofianna Resort, Paphos                         | 8. King Jason Zante                          |
| 9. Royal Apollonia, Limassol                       | <b>Restaurants and Head Offices</b>          |
| 10. St. Elias Resort, Protaras                     | 1. Akakiko and Elliniko, Nicosia (Hilton)    |
| 11. Althea Kalamies Luxury Villas, Protaras        | 2. Akakiko2Go Mall of Nicosia                |
| 12. Louis Althea Beach, Protaras                   | 3. Louis Hotels Head Office, Nicosia         |

|                                                                                                                           |                                   |
|---------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| 13. Nausicaa Beach, Protaras                                                                                              | 4. Louis PLC Head Office, Nicosia |
| 14. The King Jason Protaras                                                                                               | 5. Head Office Greece, Athens     |
| 15. Louis Infinity Blu, Protaras                                                                                          |                                   |
| 16. Chris Le Mare Luxury Villa, Chris Le Mare Gold Luxury Villa, Lora Pearl Villa, Nausicaa Beach Luxury Villas, Protaras |                                   |
| 17. Cali Resort and Spa, Paphos                                                                                           |                                   |
| 18. Hilton Nicosia                                                                                                        |                                   |

**Note 1:** Sustainability disclosures include information from active subsidiaries of Louis PLC's group of companies. **Calypso Navigation Ltd, Core Marine Ltd, Elona Maritime Co Ltd, Iona Maritime Co Ltd, Ionian Cruise Lines S.A., Lauper Shipping Co Ltd, Louis Cruise Holding Ltd, Louis Hellenic Cruises Ltd, New Wave Navigation S.A., Perla Navigation Ltd, Teal Shipping S.A., Bryden Trading Ltd, Rosebay Shipholding SA, Rachelle Investments Corp, Nictus Holdings Ltd, Leisureland Hotel Enterprises Ltd, Trevora Holdings Ltd, Harmakia Development Ltd and Clairnet Enterprises Ltd** have been dormant during the reporting period covered under the disclosure of sustainability information and as such, sustainability-related information may not be reflected in this report for the aforementioned companies. The lack of sustainability data for these dormant subsidiaries is not indicative of a disregard for environmental, social or governance considerations rather, it is a result of their inactivity during the reporting period. We remain committed to transparency and will provide updates if there are any changes in the status of these subsidiaries in future reporting periods.

The Sustainability Statement encompasses Louis PLC's upstream and downstream value chain. Value chain actors have been considered in the identification and assessment of the impacts, risks and opportunities [Refer to SBM-3]. Within our disclosures we address the relationship with the general environment, End-users, local community as well as suppliers. For more details, refer to the individual sections of this report.

We have not excluded any disclosures due to ongoing negotiations or withheld any information for intellectual property reasons.

## BP-2

### Disclosures in relation to specific circumstances

#### *Time Horizons*

The following time horizons are applied in Louis PLC's sustainability reporting to ensure that strategic planning and target-setting align with long-term business objectives and ESG commitments:

- Short-term: Up to 1 year after the end of the reporting period
- Medium-term: up to 5 years from the end of year after the reporting period
- Long-term: more than 5 years from the end of year after the reporting period

### *Sources of estimation and outcome uncertainty*

Louis PLC strives to ensure the accuracy and reliability of its data by utilizing primary measurement sources. Indirect data has been used for the calculation of GHG Scope 1 and 2 emissions, such as emission factors as well as indirect data for the calculation of certain GHG Scope 3 emissions.

Certain sustainability metrics rely on well-founded estimates where direct data is unavailable, driven by evolving calculation methodologies, data collection limitations, and potential regulatory changes. These estimates are based on available sources, such as the GHG Protocol, DEFRA, available industry sources such as the Electricity Authority of Cyprus, the Public Power Corporation of Greece, etc.

Where data or assessment is not available, a high degree of uncertainty is involved, while the information provided is based on internal knowledge based on extensive experience and publicly available information, as mentioned above.

Sustainability targets are based on current plans and assumptions about the regulatory environment and stakeholder expectations.

Value chain metrics have not been collected during the reporting period, partly due to the high level of measurement uncertainty. Following the first year of reporting under this framework, we aim to start collecting value chain information that will provide further understanding as to the impact of the company through the value chain.

Any possible sources of measurement uncertainty, assumptions, or estimates are outlined in the accounting principles for the relevant metric or information. These include waste measurements and GHG emissions, while due to the seasonality of the industry within which the company operates, a specific approach has been used for the calculation of employees in total workforce, described in the relevant section.

### *Changes in reporting*

Louis PLC has been preparing and presenting sustainability information with reference to the GRI Standards since 2017 in compliance with the NFRD. The sustainability disclosures in this report have been significantly expanded to meet the CSRD and ESRS requirements for the first time in 2024 on a voluntary basis, to present a more comprehensive approach to sustainability reporting and materiality, and to comply with the NFRD.

EU Taxonomy disclosures are provided in the environmental section of this report for the first time in 2024.

## **GOV-1**

### **Sustainability Governance**

#### *Governance Structure*

Louis PLC operates under a centralized governance framework, ensuring transparency, accountability and effective decision-making across its operations. The company

follows corporate governance best practices, integrating Environmental, Social and Governance (ESG) considerations into its business strategy and operations.

The responsibilities of individuals from the administrative, management and supervisory bodies, with regards to the material impacts, risks and opportunities are reflected in each separate policy addressing these issues, and as described in the relevant topic sections.

### Management responsibilities

#### *Board of Directors*

The Board of Directors of Louis PLC is responsible for the strategic oversight, governance, and long-term value creation for the company's stakeholders. It consists of 7 members, including:

- 2 executive members
- 3 non-executive members
- 2 non-independent non-executive members

Currently, 43% of Board members are independent, ensuring strong governance oversight and the board's gender diversity ratio for 2024 was 100% male.

The Board supervises and supports the Executive Management to ensure alignment with the Group's business objectives and sustainability strategy. Employees and other workers are not represented in the Board of Directors.

#### *Board Composition & Expertise*

The Board members bring extensive experience in the tourism, hospitality, finance, legal, and investment sectors, covering Cyprus, Greece, and international markets. Their expertise includes corporate governance, financial management, sustainability, and regulatory compliance.

| <b>Board of Directors</b>   | <b>Role</b>          | <b>Experience</b>                                          |
|-----------------------------|----------------------|------------------------------------------------------------|
| <b>Costakis Loizou</b>      | Chairman             | Tourism, Hospitality, Corporate Governance                 |
| <b>Jason Perdios</b>        | Managing Director    | Hotel & Hospitality Management, Strategy                   |
| <b>Louis K. Loizou</b>      | Executive Director   | Business Administration, Corporate Finance, Tourism        |
| <b>Christos Mavrellis</b>   | Non-Executive Member | Law, Finance, Taxation, Corporate Governance               |
| <b>George Lysiotis</b>      | Non-Executive Member | Chartered Accountant, Private Equity, Financial Management |
| <b>Christakis Tausianis</b> | Non-Executive Member | Banking, Risk Management, Business Consultancy             |
| <b>Theodoros Middleton</b>  | Non-Executive Member | Real Estate, Digital Media, Business Consultancy           |



### *Board Committees*

The Board operates through specialized committees. All committees have at least 3 Board members. **The Audit Committee**, oversees financial reporting, non-financial reporting and internal controls, ensuring compliance with governance standards. **The Remuneration Committee** advises on executive compensation. **The Nomination Committee** evaluates the composition of the Board and Executive Management and focus on matters including sustainability competencies.

### *Executive Management*

Executive Management, consisting of 2 members, is responsible for executing the Group's strategic direction and ensuring compliance with corporate policies, legal requirements, and sustainability commitments. It oversees financial and non-financial reporting, manages ESG initiatives across subsidiaries, and regularly updates the Board on sustainability performance. Meetings with the Board and its committees ensure alignment between corporate governance and operational strategy.

### *Sustainability Governance*

Louis PLC has set up a multi-tiered sustainability governance structure:

- **Board Sustainability Committee:** Oversees and advises on ESG policies, risk management, and sustainability strategy.
- **Louis Hotels Sustainability Committee:** Composed of the Group's C-suite executives, responsible for overseeing the implementation of sustainability initiatives across the hotel portfolio.
- **Core Sustainability Team:** Based at Louis Hotels Headquarters, this team includes representatives from various departments to ensure sustainability is embedded in all operational areas.
- **Sustainability Representatives at Hotel Units:** Each hotel appoints dedicated sustainability representatives who implement tailored action plans based on local market needs and report on ESG performance to headquarters.





## GOV-2

### Sustainability Matters Addressed by the undertaking's administrative, management and supervisory bodies

The Board of Directors and executive leadership at Louis PLC are committed to integrating sustainability into governance, strategy and risk management. The company ensures that material impacts, risks and opportunities (IROs) related to sustainability are effectively overseen by the administrative, management and supervisory bodies through structured governance mechanisms.

#### *Board Oversight and Reporting*

The Board is informed annually about material impacts, risks and opportunities (IROs), due diligence implementation and the effectiveness of sustainability policies through the company's Sustainability Report. This includes key performance indicators (KPI's) aligned with regulatory requirements and international reporting standards.

#### *Sustainability in Strategy and Decision-Making*

Sustainability is integrated into our business strategy, guiding major transactions and risk management processes. The Board of Directors conducts annual reviews of key ESG risks and opportunities, assessing their impact on financial performance and long-term resilience. This ensures that sustainability remains a priority in our long-term planning.

The Sustainability Committee sets and recommends targets focused on material topics including carbon reduction, resource efficiency, and social responsibility. For major transactions, sustainability due diligence evaluates environmental and social impacts, regulatory compliance and alignment with corporate ESG commitments.

#### *Board Expertise and Performance Monitoring*

The Board receives regular ESG training and updates on regulations, investor expectations, and sustainability trends. The Sustainability Committee monitors performance against sustainability targets, ensuring compliance and continuous improvement. Where the appropriate expertise and skills to tackle specific sustainability issues, is not available internally, we seek external expertise.

## GOV-3

### Incentive Schemes

Louis PLC does not currently have incentive schemes or remuneration policies linked to sustainability matters for members of its administrative, management or supervisory bodies.

Members of the Board and Executive Management are not assessed based on performance against sustainability-related targets or impacts, nor are sustainability performance metrics included in remuneration policies as performance benchmarks.

As a result, there is no variable remuneration dependent on sustainability-related performance, and no approval or update process exists for such schemes within the organization. Louis PLC continuously evaluates its governance structures and may consider integrating sustainability-related incentives into future remuneration frameworks.

## GOV-4

### Due Diligence

| Core Elements of Due Diligence                                                    | Sections in the Sustainability Statement                                                      |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| Embedding due diligence in governance, strategy, and business model               | GOV-1<br>GOV-2<br>G1-1<br>SBM-1<br>SBM-2                                                      |
| Engaging with affected stakeholders in all key steps of the due diligence process | SBM-2<br>S3-2<br>S4-2                                                                         |
| Identifying and assessing adverse impacts                                         | SBM-3<br>IRO-1<br>IRO-2                                                                       |
| Taking actions to address those adverse impacts                                   | GOV-2<br>GOV-5<br>E1-1 & E1-3<br>E3-2<br>E4-3<br>E5-2<br>S1-4<br>S3-4<br>S4-4<br>G1-3<br>G1-4 |
| Tracking the effectiveness of these efforts and communicating progress            | GOV-5<br>E1-4<br>E3-3<br>E4-4<br>S1-5<br>S3-5<br>S4-5<br>G1-4                                 |

## GOV-5

### Risk Management

The Board of Directors has the overall responsibility for the adoption and oversight of the Company's risk management framework. The Company's Risk Management Policies are established to identify and analyse the risks faced by the Group and the Company, to set appropriate risk limits and control mechanisms, and to monitor risks and adherence to these limits. Risk Management Policies and systems are regularly revised to reflect changes in market conditions and in the activities of the Group and the Company. Our internal control and risk management systems ensure the orderly operation of the company and adherence to internal procedures.

The internal risk assessment and the identified embedded risks were used to inform the identification of impacts risks and opportunities (IROs). The identified risks and relevant mitigation strategies are described under each materiality topic section.

## SBM-1

### Strategy, Business Model, and Value Chain

#### *Business Overview*

Louis PLC is a publicly listed company since 1999. Due to the seasonality of the industry within which the company operates, a headcount at the end of the reporting year does not represent the actual number of employees, as this results in variations of headcount throughout the year. As such, a full-time equivalent calculation, presents the following: 2078 employees (FTE) in total, 450 employees in Greece and 1628 in Cyprus. The average number of employees presents the following: 1.689 employees in total, 267 employees in Greece and 1422 in Cyprus. The company operates as a leading hospitality company in the Southeastern Mediterranean, focusing on hotel ownership, operation, and management through its subsidiary, Louis Hotels Public Company Ltd. With a diverse portfolio of 4- and 5-star hotels and resorts in Cyprus and Greece, the company delivers high-quality tourism experiences while continuously enhancing its service offerings, catering to both leisure and business travellers.



The core business of our company is Hotel Operations & Management – Owning and managing a growing portfolio of properties, catering to various market segments, including luxury, family-friendly and adults-only resorts.

Through our core business, we incorporate the following as part of our business strategy:

- Strategic Partnerships – Collaborating with leading international tour operators and franchise agreements with brands such as TUI and Design Hotels to enhance global reach.
- Sustainable Development & Investments – Prioritizing renovations, technology upgrades and eco-friendly initiatives to improve guest experience and operational efficiency.

### *Significant Markets and Customer Groups*

Louis PLC primarily serves mainly European tourists, corporate clients and travel operators. The company's market presence spans coastal resort destinations and urban business hubs in Cyprus and Greece, ensuring a diverse and resilient customer base. In Cyprus, the majority of tourists originate from the UK, Scandinavian countries, Germany, Greece, France, Poland and Israel, while in Greece, a significant portion of visitors comes from Asia and the US. Strategic partnerships with major tour operators and travel agencies drive consistent demand and high occupancy levels.

### *Business Model and Value Chain*

Louis PLC follows a vertically integrated business model, managing owned, leased and franchised hotel properties. The company's value chain encompasses all activities, resources, hotel operations and relationships involved in the Company's business model along with interactions with the broader external environment. This includes both internal operations and external engagements with suppliers, partners and customers. Upstream represents entities from where the company receives goods or services as inputs, while downstream represents entities or individuals receiving goods and services from the Company. Internal operations include its properties, operations and functional departments.

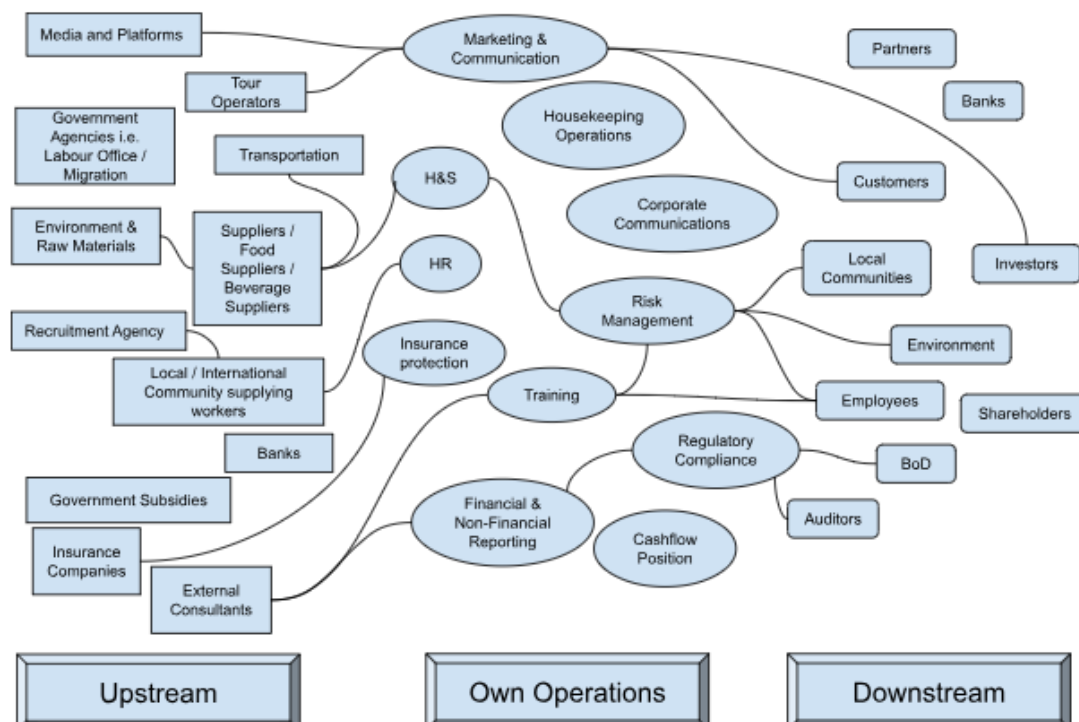


Figure 1: Value Chain

Please Note: The illustration is not exhaustive

## *Sustainability-Related Goals and Strategy*

### Environmental Goals

Louis PLC aims to play an active role in the transition to a sustainable and climate-neutral society by focusing on climate change mitigation and responsible resource management, including water usage and waste reduction.

### Social Goals

Louis PLC strives to be an engaging and appealing workplace for all employees, regardless of seasonality. As the company's most valued stakeholders, employees and customers are a top priority. Therefore, ensuring their health, safety, and information security remains a key focus area. This is achieved through training, education and established procedures.

### Governance Goals

Louis PLC regards good business conduct as the cornerstone of a credible, trustworthy, and well-managed company. By acting responsibly and with integrity, in accordance with our Code of Business Conduct and Ethics, we foster long-term relationships with business partners and local communities, while reinforcing the foundation for a sustainable and successful business.

*Please refer to Policies, Actions and Targets under each material topic for more information on sustainability related goals.*

## SBM-2

### Interests and Views of Stakeholders

Stakeholder engagement is an essential and continuous process that directly shapes Louis PLC's ESG priorities and strategic decisions. By fostering open dialogue with both internal and external stakeholders, the company's business model and strategy, are constantly evolving to increase transparency, accountability and alignment with stakeholder expectations.

Stakeholders include individuals or entities significantly affected by Louis PLC's operations and those with the capacity to influence the company's strategic direction. Engagement is conducted through structured and ad hoc interactions, enabling the identification of material sustainability topics and their integration into corporate strategy.

Regular dialogue provides the Group with the tools to understand and respond to stakeholders' needs and expectations, to improve the products and services offered, while responding to the needs and expectations of the society in which the company operates.

Administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders through a variety of mechanisms, such as through the

whistle-blower channels, other forms of complaints, reviews, etc. The form of communication with the different stakeholders is described below:

### **Key Stakeholders**

| <b>Stakeholder Group</b>          | <b>Main areas of interest and expectations</b>                                                                                                                                                                                                                                                                                                                                                      | <b>Form of Communication</b>                                                                                                                                                                                                 |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Employees</i>                  | <ul style="list-style-type: none"> <li>• Health and Safety</li> <li>• Employee motivation and engagement</li> <li>• Employee Performance</li> <li>• Talent attraction and retention</li> <li>• Training/ Education</li> <li>• Human Rights/Diversity</li> <li>• Equal Opportunities</li> <li>• Operational effectiveness</li> <li>• Personal Data Protection</li> </ul>                             | <ul style="list-style-type: none"> <li>• Internal employee meetings</li> <li>• Workshops/Seminars/ Trainings</li> <li>• Employee surveys</li> <li>• Private meetings</li> <li>• Announcements</li> <li>• Intranet</li> </ul> |
| <i>Shareholders and Investors</i> | <ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Strategy and investments</li> <li>• Financial performance</li> <li>• Corporate governance</li> <li>• Compliance</li> <li>• Operational effectiveness</li> <li>• Employee Performance</li> <li>• Personal Data Protection</li> <li>• Social contribution</li> <li>• Transparency/Anti-Corruption/Money laundering</li> </ul> | <ul style="list-style-type: none"> <li>• Annual &amp; Interim Reports</li> <li>• Annual General Meetings</li> <li>• Extraordinary General Meetings</li> <li>• Announcements</li> <li>• IR Website</li> </ul>                 |
| <i>Customers</i>                  | <ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Quality and satisfaction</li> <li>• Personal Data Protection</li> <li>• Responsible marketing</li> <li>• Passenger rights</li> </ul>                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>• Customer relationship management (CRM) systems</li> <li>• Customer satisfaction surveys</li> <li>• Audits from Travel Auditors</li> </ul>                                           |

|                                           |                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                        |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Social Media Network</li> <li>• Newsletters</li> <li>• Mobile app</li> </ul>                                                                                                                                  |
| <i>Tour Operators &amp; Travel Agents</i> | <ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Customer service, quality and satisfaction</li> <li>• Personal Data Protection</li> <li>• Responsible Marketing</li> <li>• Environmental Management</li> <li>• Financial performance</li> <li>• Social contribution</li> <li>• Passenger rights</li> </ul> | <ul style="list-style-type: none"> <li>• Customer satisfaction surveys</li> <li>• Complaints management</li> <li>• Terms of Agreements</li> <li>• Media and social media</li> <li>• Advertisements</li> <li>• Audits</li> <li>• Newsletters</li> </ul> |
| <i>Society and Local bodies</i>           | <ul style="list-style-type: none"> <li>• Health and Safety</li> <li>• Responsible Marketing</li> <li>• Personal data protection</li> <li>• Environmental performance</li> <li>• Social contribution</li> </ul>                                                                                                                   | <ul style="list-style-type: none"> <li>• Meetings with local bodies</li> <li>• Media</li> <li>• Social Media Network</li> </ul>                                                                                                                        |
| <i>Suppliers</i>                          | <ul style="list-style-type: none"> <li>• Transparency</li> <li>• Social contribution</li> <li>• Responsible procurement/ supply chain management</li> </ul>                                                                                                                                                                      | <ul style="list-style-type: none"> <li>• Meetings</li> <li>• Terms of Agreements</li> </ul>                                                                                                                                                            |
| <i>Government</i>                         | <ul style="list-style-type: none"> <li>• Health and Safety</li> <li>• Compliance</li> <li>• Passenger rights</li> <li>• Transparency</li> <li>• Anti-corruptions/ money laundering</li> <li>• Personal Data Protection</li> </ul>                                                                                                | <ul style="list-style-type: none"> <li>• Legislation</li> <li>• Public Consultations</li> </ul>                                                                                                                                                        |
| <i>Collaboration with market services</i> | <ul style="list-style-type: none"> <li>• Health and Safety</li> <li>• Customer service, quality and satisfaction</li> </ul>                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>• Meetings</li> <li>• Terms of Agreements</li> </ul>                                                                                                                                                            |

- |                                                                    |  |
|--------------------------------------------------------------------|--|
| <ul style="list-style-type: none"> <li>• Local products</li> </ul> |  |
|--------------------------------------------------------------------|--|

Through this regular and open dialogue with different stakeholder groups, internal stakeholders and proxies who are members of the core sustainability team, are more equipped to identify and assess impacts, risks and opportunities that are associated with the company.

To strengthen this process, Louis PLC conducted a Stakeholder Engagement Survey aligned with the ESRS sustainable matters. The survey results informed the DMA, providing valuable insights into stakeholder priorities related to the company's environmental and social impacts, as well as associated financial risks and opportunities.

By incorporating stakeholder feedback, Louis PLC continues to refine its sustainability strategy, enhance risk management practices, and improve its overall ESG performance.

### SBM-3, IRO-1 & IRO-2

A materiality assessment was previously carried out based on the GRI 2021 Universal Standards. Following the voluntary adoption of ESRS, Louis PLC revised the approach to comply with these new requirements. The assessment will be repeated if or when a significant change occurs or following a significant event that might affect the company's operations.

### Understanding the value chain

The initial step in identifying and evaluating impacts, risks and opportunities relevant to Louis PLC, involved mapping and understanding the business model and value chain. This included a comprehensive analysis of its operations in hotel management, supply chain, and customer interactions, establishing a clear assessment scope.

According to ESRS terms, Value Chain (VC) is defined as the full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. It is also recognised that although used in the singular, an undertaking can have multiple value chains, as is the case for Louis PLC.

Value chain mapping was conducted by the company's cross-functional core Sustainability team, which includes professionals within the company with extensive experience from a number of departments, with the results being verified by top management.

### Identifying Impacts, Risks and Opportunities

With the whole value chain in mind, Impacts, Risks and Opportunities (IROs) were identified across the list of sustainability matters covered in the topical ESRS, including topics, sub-topics and sub-sub-topics. In addition to the existing internal information and insight, a number of sources were used in the identification process, to understand



related industry issues based on research, peer benchmarking, national, EU and international regulation, as well as other standards (SASB and GRI). Consideration was also given to the geographical locations of all own operations, the company risk registry, current issues such as conflicts and wars, as well as the company business relationships, especially with suppliers, the local community and the general environment. Internal proxies were involved in the identification of the impacts, risks and opportunities. Once the final list of IROs was created a validation exercise was carried out by the internal proxies, to verify or amend the list.

## Assessing Impacts, Risks and Opportunities

Considering the EU regulatory developments and requirements, by the CSRD, the ESRS and the current implementation guidelines provided by EFRAG, applied on a voluntary basis, the introduction of the double materiality perspective gives rise to two separate components:

### - **Impact Materiality:**

A sustainability matter is material from an impact perspective when it pertains to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short-, medium- or long-term. Impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. Business relationships include those in the company's upstream and downstream value chain and are not limited to direct contractual relationships.

### - **Financial Materiality:**

A sustainability matter is material from a financial perspective if it generates risks or opportunities that affect (or could reasonably be expected to affect) the company's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term.

## *Impact materiality*

**Impact materiality** analysis consists of assessing the potential and actual positive or negative impacts generated by Louis PLC on the environment and the, over the short, medium and long term. In particular, impacts were assessed on the basis of the following criteria:

- For actual or potential positive or negative impacts:
  - **Severity:**
    - **Scale:** how grave the negative impact is or could be or how beneficial the positive impact is on people or the environment.
    - **Scope:** how widespread the negative or positive impacts are. In the case of environmental impacts, the scope may

be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected.

- Irremediability: whether and to what extent the negative impacts could be remediated, i.e., restoring the environment or affected people to their prior state.

- Likelihood: how likely is the impact in the case of potential impacts

While severity and likelihood have equal weighting, in the case of **potential negative human rights impacts**, severity takes precedence over likelihood, as specified in ESRS 1, paragraph 45. The impact statements were assessed, based on the above criteria and the following scoring framework:

| Scoring Framework for Impact Materiality                                                                                                               |                  |                                  |                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------------|---------------------------------------------|
| Severity (a total of scale and scope for positive impacts – out of 12<br>A total of scale, scope and irremediability for negative impacts – out of 18) |                  |                                  | Likelihood (1-6) only for potential impacts |
| Scale (1-6)                                                                                                                                            | Scope (1-6)      | Irremediability (1-6)            |                                             |
| 1 - not at all                                                                                                                                         | 1 - not at all   | 1 - very easy to remediate       | 1 - none                                    |
| 2 - a little                                                                                                                                           | 2 - limited      | 2 - relatively easy to remediate | 2 - very low/minimal                        |
| 3 - low                                                                                                                                                | 3 - concentrated | 3 - remediable with effort       | 3 - low                                     |
| 4 - medium                                                                                                                                             | 4 - medium       | 4 - difficult to remediate       | 4 - medium                                  |
| 5 - high                                                                                                                                               | 5 - widespread   | 5 - very difficult to remediate  | 5 - highly likely                           |
| 6 - great                                                                                                                                              | 6 - total/global | 6 - irremediable                 | 6 - absolute likelihood                     |

Materiality was calculated based on the scoring system translated into percentages for severity and likelihood.

#### *Financial materiality*

**Financial materiality** analysis consists of assessing the risks and opportunities that arise for Louis PLC from the environment, the people and the economy, as well as the risks and opportunities that arise from impacts and dependencies. An outside-in approach to assess how the external environment affects or could affect the financial situation of the company in the short, medium and long term, without consideration of any existing measures to mitigate risks. Financial impacts (risks and opportunities) were assessed based on the following criteria:

- For risks and opportunities:
  - Likelihood: how likely is it that a risk or opportunity can occur
  - Magnitude: what is the size of impact this risk or opportunity can have on the company. The risks and opportunities assessed, based on the above criteria and the following scoring framework:

| Soring Framework for Financial Materiality |                         |
|--------------------------------------------|-------------------------|
| Magnitude (1-6)                            | Likelihood (1-6)        |
| 1 - none                                   | 1 - none                |
| 2 - very small/minimal                     | 2 - very low/minimal    |
| 3 – small                                  | 3 - low                 |
| 4 – medium                                 | 4 - medium              |
| 5 – large                                  | 5 - highly likely       |
| 6 – great                                  | 6 - absolute likelihood |

Internal magnitude ranges were assigned to the scoring system for a consistent approach to all risks and opportunities.

Materiality was calculated based on the scoring system translated into percentages for magnitude and likelihood.

## External Stakeholder Engagement

To aid the process of the materiality assessment, the company conducted further engagement with internal and external stakeholders, to gather insights from key stakeholders, to understand their priorities regarding sustainability issues.

Stakeholder groups (*Office Staff, Hotel Staff, Senior Management, Board Members, Shareholders, Guests, Tour operators/Travel Agents, Suppliers, Partners, NGO's, Affected Community*) were asked to rank the topics provided, which were based on the ESRS sustainability topics, in order of priority, in terms of the impact Louis PLC has on them through its activities and operations, as well as the priority in terms of the perceived financial impact the provided topics can have on Louis PLC's activities and operations.

The final ranking provided weighting for each topic, that was added to the percentage of the internal assessment on the list of IROs, from both an impact and financial materiality perspective.

## Assumptions

In light of the requirements of the ESRS, some assessments necessary for the identification and evaluation of certain impacts where unavailable therefore reliance on internal expert knowledge was necessary.

Additionally, value chain related impacts, risks and opportunities were considered through the use of internal proxies, relevant to groups of external stakeholders, i.e. HR, insurance, H&S, marketing, communications, procurement, quality and finance, as they were assumed to be the best representatives for these stakeholders.

## Validation and Approval

Cross-functional workshops with sustainability, finance, operations, and governance teams validated the results. The Board of Directors and Executive Management reviewed and approved the final list of material topics. Material Impacts, Risks and Opportunities.

The Double Materiality Assessment resulted in the identification of key sustainability topics across environmental, social and governance (ESG) areas:

| <b><i>Sustainability Matter</i></b>     | <b><i>Negative Impacts</i></b>                | <b><i>Positive Impacts</i></b>                    | <b><i>Risks</i></b>                                        | <b><i>Opportunities</i></b>         | <b><i>Page Reference</i></b> |
|-----------------------------------------|-----------------------------------------------|---------------------------------------------------|------------------------------------------------------------|-------------------------------------|------------------------------|
| <i>E1 Climate Change</i>                | Climate Change Mitigation                     | <input checked="" type="checkbox"/>               | <input checked="" type="checkbox"/>                        | Energy                              | <a href="#">38</a>           |
|                                         | Energy                                        |                                                   |                                                            |                                     |                              |
| <i>E3 Water &amp; Marine Resources</i>  | Water Consumption                             | <input checked="" type="checkbox"/>               | <input checked="" type="checkbox"/>                        | <input checked="" type="checkbox"/> | <a href="#">58</a>           |
| <i>E4 Biodiversity &amp; Ecosystems</i> | Direct impact drivers of biodiversity loss    | <input checked="" type="checkbox"/>               | <input checked="" type="checkbox"/>                        | <input checked="" type="checkbox"/> | <a href="#">61</a>           |
| <i>E5 Circular economy</i>              | Waste                                         | <input checked="" type="checkbox"/>               | <input checked="" type="checkbox"/>                        | Waste                               | <a href="#">64</a>           |
| <i>S1 Own Workforce</i>                 | <input checked="" type="checkbox"/>           | <input checked="" type="checkbox"/>               | Working Conditions                                         | <input checked="" type="checkbox"/> | <a href="#">70</a>           |
|                                         |                                               |                                                   | Other work-related rights                                  |                                     |                              |
| <i>S3 Affected Communities</i>          | <input checked="" type="checkbox"/>           | Communities' economic, social and cultural rights | <input checked="" type="checkbox"/>                        | <input checked="" type="checkbox"/> | <a href="#">84</a>           |
| <i>S4 Consumers &amp; End-Users</i>     | Personal safety of consumers and/or end-users | <input checked="" type="checkbox"/>               | Information-related impacts for consumers and/or end-users | <input checked="" type="checkbox"/> | <a href="#">88</a>           |
| <i>G1 Business Conduct</i>              | <input checked="" type="checkbox"/>           | <input checked="" type="checkbox"/>               | Corporate Culture                                          | <input checked="" type="checkbox"/> | <a href="#">93</a>           |
|                                         |                                               |                                                   | Corruption and bribery                                     |                                     |                              |

The current effects of each material impact, risk and opportunity on Louis PLC's business model, the value chain position where the IROs originate from, the time-horizons, strategy and decision-making, including the company's actions or planned

response actions, are presented within the respective topical standards disclosures throughout the Sustainability Statement.

The anticipated financial effects on the company's financial position, performance and cash flows over the short-, medium and long-term have not yet been quantified at this stage.

## Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The Double Materiality Assessment resulted in the identification of the ESRS Disclosure requirements that are covered by this statement:

### *Index of material disclosures*

| ESRS Topic Mater | DR    | Description                                                                                                                         | Page Number |
|------------------|-------|-------------------------------------------------------------------------------------------------------------------------------------|-------------|
| ESRS2            | BP-1  | General basis for preparation of sustainability statements                                                                          | 12          |
|                  | BP-2  | Disclosures in relation to specific circumstances                                                                                   | 14          |
|                  | GOV-1 | The role of the administrative, management and supervisory bodies                                                                   | 15          |
|                  | GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | 18          |
|                  | GOV-3 | Integration of sustainability-related performance in incentive schemes                                                              | 18          |
|                  | GOV-4 | Statement on due diligence                                                                                                          | 19          |
|                  | GOV-5 | Risk management and internal controls over sustainability reporting                                                                 | 20          |
|                  | SBM-1 | Strategy, business model and value chain                                                                                            | 20          |

|                                 |          |                                                                                                  |    |
|---------------------------------|----------|--------------------------------------------------------------------------------------------------|----|
|                                 | SBM-2    | Interests and views of stakeholders                                                              | 23 |
|                                 | SBM-3    | Material impacts, risks and opportunities and their interaction with strategy and business model | 26 |
|                                 | IRO-1    | Description of the process to identify and assess material impacts, risks and opportunities      | 26 |
|                                 | IRO-2    | Disclosure requirements in ESRS covered by the undertaking's sustainability statement            | 26 |
| E1 – Climate Change             | E1-IRO-1 | Impacts, Risks, and Opportunities (IROs)                                                         | 39 |
|                                 | E1-1     | Transition plan for climate change mitigation                                                    | 40 |
|                                 | E1-2     | Policies related to climate change mitigation and adaptation                                     | 41 |
|                                 | E1-3     | Actions and resources in relation to climate change policies                                     | 40 |
|                                 | E1-4     | Targets related to climate change mitigation and adaptation                                      | 42 |
|                                 | E1-5     | Energy consumption and mix                                                                       | 42 |
|                                 | E1-6     | Gross Scopes 1, 2, 3 and Total GHG emissions                                                     | 43 |
| E3 – Water and Marine Resources | E3-IRO-1 | Description of the processes to identify and assess material water and marine                    | 62 |

|                                  |          |                                                                                                                                         |    |
|----------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------|----|
|                                  |          | resources-related impacts, risks and opportunities                                                                                      |    |
|                                  | E3-1     | Policies related to water and marine resources                                                                                          | 63 |
|                                  | E3-2     | Actions and resources related to water and marine resources                                                                             | 63 |
|                                  | E3-3     | Targets related to water and marine resources                                                                                           | 64 |
|                                  | E3-4     | Water consumption                                                                                                                       | 64 |
| E4 – Biodiversity and Ecosystems | E4-SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model                                        | 65 |
|                                  | E4-IRO-1 | Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities            | 65 |
|                                  | E4-2     | Policies related to biodiversity and ecosystems                                                                                         | 45 |
|                                  | E4-3     | Actions and resources related to biodiversity and ecosystems                                                                            | 66 |
|                                  | E4-4     | Targets related to biodiversity and ecosystems                                                                                          | 67 |
|                                  | E4-5     | Impact metrics related to biodiversity and ecosystems change                                                                            | 67 |
| E5 – Circular Economy            | E5-IRO-1 | Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities | 68 |

|                    |           |                                                                                                                                                                                                |    |
|--------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
|                    | E5-1      | Policies related to resource use and circular economy                                                                                                                                          | 69 |
|                    | E5-2      | Actions and resources related to resource use and circular economy                                                                                                                             | 70 |
|                    | E5-3      | Targets related to resource use and circular economy                                                                                                                                           | 70 |
|                    | E5-5      | Resource outflows                                                                                                                                                                              | 71 |
| S1 – Own Workforce | S1- SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model                                                                                               | 74 |
|                    | S1- 1     | Policies related to own workforce                                                                                                                                                              | 75 |
|                    | S1- 4     | Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | 79 |
|                    | S1- 5     | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                               | 83 |
|                    | S1- 6     | Characteristics of the undertaking's employees                                                                                                                                                 | 84 |
|                    | S1-7      | Characteristics of non-employees in the undertaking's own workforce                                                                                                                            | 85 |
|                    | S1-8      | Collective bargaining coverage and social dialogue                                                                                                                                             | 85 |
|                    |           |                                                                                                                                                                                                |    |



|                              |           |                                                                                                                                                                                                              |    |
|------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
|                              | S1-13     | Training and skills development metrics                                                                                                                                                                      | 86 |
|                              | S1-14     | Health and safety metrics                                                                                                                                                                                    | 86 |
|                              | S1-17     | Incidents, complaints and severe human rights impacts                                                                                                                                                        | 87 |
| S3 – Affected Communities    | S3- SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model                                                                                                             | 88 |
|                              | S3-1      | Policies related to affected communities                                                                                                                                                                     | 89 |
|                              | S3-2      | Processes for engaging with affected communities about impacts                                                                                                                                               | 89 |
|                              | S3-4      | Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | 90 |
|                              | S3-5      | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                             | 91 |
|                              |           |                                                                                                                                                                                                              |    |
| S4 – Consumers and End-Users | S4- SBM-3 | Material impacts, risks and opportunities and their interaction with                                                                                                                                         | 92 |

|                       |           |                                                                                                                                                                                                                    |     |
|-----------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                       |           | strategy and business model                                                                                                                                                                                        |     |
|                       | S4-1      | Policies related to consumers and end-users                                                                                                                                                                        | 94  |
|                       | S4-2      | Processes for engaging with consumers and end-users about impacts                                                                                                                                                  | 94  |
|                       | S4-3      | Processes to remediate negative impacts and channels for consumers and end-users to raise concerns                                                                                                                 | 95  |
|                       | S4-4      | Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | 95  |
|                       | S4-5      | Targets                                                                                                                                                                                                            | 96  |
| G1 – Business Conduct | G1- GOV 1 | The role of the administrative, supervisory and management bodies                                                                                                                                                  | 97  |
|                       | G1- IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities                                                                                                                      | 97  |
|                       | G1- 1     | Business conduct policies and corporate culture                                                                                                                                                                    | 97  |
|                       | G1- 3     | Prevention and detection of corruption and bribery                                                                                                                                                                 | 100 |
|                       | G1- 4     | Incidents of corruption or bribery                                                                                                                                                                                 | 100 |

# Environment

## Climate Change

### E1.IRO-1

#### *Impacts, Risks, and Opportunities (IROs)*

Louis PLC has conducted an assessment of its climate-related environmental impacts, risks and opportunities across its operations and value chain, with material impacts resulting from the generation of greenhouse gas (GHG) emissions and energy consumption across its establishments. These emissions arise from direct operations and energy use by guests and staff.

In response to these challenges, Louis PLC has identified an opportunity to mitigate its environmental footprint and eventually act as a cost-saving mechanism. The company is investing in energy-efficient technologies and renewable energy installations, both in new units and existing property renovations. These initiatives are designed to reduce reliance on fossil fuels, lower energy consumption and costs, and enhance the group's reputation for environmental responsibility among customers and stakeholders.

While Louis PLC has not yet applied climate-related scenario analysis to assess transition events and exposures, it continues to evaluate its operations to align with the transition to a climate-neutral economy.

| Type                    | IRO                     | Description                                                                                                                      | Position in the Value Chain | Time Horizon |
|-------------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Actual Negative Impacts | GHG Emissions           | Direct and indirect emissions resulting from hotel operations have a negative impact by contributing to climate change.          | UO*                         | L**          |
|                         | Electricity Consumption | Energy consumption by staff and guests within hotel operations negatively impacts the environment by driving higher energy usage | O*                          | SML**        |

|               |                                  |                                                                                                                                                                                                                                  |    |     |
|---------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
|               |                                  | and associated greenhouse gas emissions.                                                                                                                                                                                         |    |     |
| Opportunities | Reducing Fossil Fuel Consumption | Implementation of renewable energy sources and energy-saving practices, such as automatically turning off power in unoccupied hotel rooms, can reduce costs and enhance the group's reputation for environmental responsibility. | O* | S** |

\*O= Own Operations, U = Upstream, D = Downstream.

\*\*S = Short-term, M = Medium-term, L = Long-term.

## E1-1 & E1-3

### *Actions and Transition plan*

Louis PLC's transition plan includes a number of modifications and installations to existing establishments in order to reduce energy consumption, GHG emissions as well as reliance on fossil fuels.

The plan is focused on the short term. During 2024, the core sustainability team and the CSR ambassadors (at hotel level) received extensive awareness training on a number of environmental issues, including climate change and energy efficiency. The company also invested in a decarbonisation project (CapEx - €30k), partly subsidised by a government scheme, guided by frameworks such as the GHG Protocol and ISO 14064, for the identification of decarbonisation levers and the expected emission reductions from the application of the different actions. Negotiations for the implementation of specific actions took place, involving the technical team, purchasing department and potential suppliers.

During the reporting year, we proceeded with the purchase of two hybrid vehicles (CapEx - €42k) and installed EV charging stations at all hotels encouraging guests to use electric/hybrid vehicles during their stay.

We have allocated €423k CapEx for 2025 for GHG emission reduction improvements for Royal Apollonia, Louis Imperial Beach and Louis Phaethon Beach for the installation of Photovoltaic panels, and €1,409k CapEx allocated for climate change mitigation through sustainable building expenditure and technologies, for the renovation of Ionian Sun, Valmar.

The expected reduction in emissions in the first year of operation of the PV systems is as follows: Royal Apollonia 128tCO<sub>2</sub>e reduction, Phaethon Beach 211tCO<sub>2</sub>e reduction and Louis Ledra Beach 118tCO<sub>2</sub>e reduction.

Additional initiatives involving pipe insulation, pool covers, solar water heaters, adiabatic cooling panels, variable frequency drive (VFD) installations and multiple energy management system technologies, will be discussed further, for potential implementation in future years. All relevant plans are approved by the sustainability committee, top management and Board of Directors.

The expectation is that our locked-in emissions are likely to increase as the company expands its operations with the addition of new hotel units. These additions however are unlikely to jeopardise emission reductions as the company aims at making the necessary adjustments & investments, through renovations and future construction works.

Louis PLC does not fall under the exclusion criteria for the EU Paris-aligned Benchmarks, as outlined in Article 12.1 (d-g) and 12.2 of (EU) 2020/1818. While formal targets fully compatible with the Paris Agreement goal of 1.5°C are still under development, the company remains committed to reducing emissions year by year and aligning more closely with international climate objectives.

Further to the above, it is important to note that the company aims to prioritise investment in actions that will address material issues, such as GHG emissions from own operations, and will aim to utilise any investment opportunities and subsidy schemes to further enhance the transition plan.

Additional to the above, Louis PLC invested €20k for training purposes, including ISO14001 as well as other training covering a range of environmental issues, including climate change.

## E1-2

*Policies Louis PLC aims to develop a comprehensive Environmental Policy aimed at addressing its material IROs related to climate change mitigation and adaptation. Once finalised, the policy will serve as the framework guiding the company's approach to environmental responsibility and climate-related actions across its operations and value chain. Louis PLC expects to publish the Environmental Policy in due course, ensuring alignment with its broader sustainability objectives and regulatory requirements.*

Although the company has carried out materiality assessments in the past, a thorough IRO assessment as prescribed by the ESRS had not been implemented before. As such,

the company takes this opportunity to identify gaps and key focus areas based on material topics to create a comprehensive policy on a variety of topics.

## E1-4

### *Targets*

At present, Louis PLC has not established any measurable, outcome-oriented greenhouse gas (GHG) emissions reduction targets and no science-based targets have been adopted to ensure compatibility with the objective of limiting global warming to 1.5°C under the Paris Agreement. Lack of comprehensive research and accurate historic data did not allow for the creation and implementation of targets, however the company aims to utilise the information provided within this report and as per ESRS, to make better informed decisions as to the setting of GHG related targets.

The effectiveness of the above-mentioned actions will be measured through the reporting of energy consumption and GHG emission metrics, using 2024 figures as baseline.

## E1-5

### *Energy consumption and mix*

Energy consumption sources were identified and monitored for all our establishments, including purchased electricity that was used to run our operations. Sources other than purchased electricity include Liquified Petroleum Gas (LPG), biomass pellets, diesel for heating, diesel for company cars and other equipment, and petrol for company cars and other equipment. DEFRA conversion factors were used for the calculation of energy consumption. The total energy consumption and breakdown is displayed in Table 1. Figure 1 represents the share of energy consumption by source. Energy intensity is calculated using the company's net revenue for 2024.

*Table 1: Energy Consumption and mix*

|                                                                                                                                                                       |               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Total fossil energy consumption (MWh)</b>                                                                                                                          | <b>30,232</b> |
| Share of fossil sources in total energy consumption (%)                                                                                                               | 83.46         |
| <b>Consumption from nuclear sources (MWh)</b>                                                                                                                         | <b>35</b>     |
| Share of consumption from nuclear sources in total energy consumption (%)                                                                                             | 0.10          |
| Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh) | 3,808         |
| Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources                                                                      | 2,150         |
| Consumption of self-generated non-fuel renewable energy                                                                                                               | 0             |
| <b>Total renewable energy consumption (MWh)</b>                                                                                                                       | <b>5,958</b>  |
| Share of renewable sources in total energy consumption (%)                                                                                                            | 16.45         |
| <b>Total energy consumption (MWh)</b>                                                                                                                                 | <b>36,225</b> |

**Energy Intensity for 2024:** 275.795 MWh per million EUR net revenue

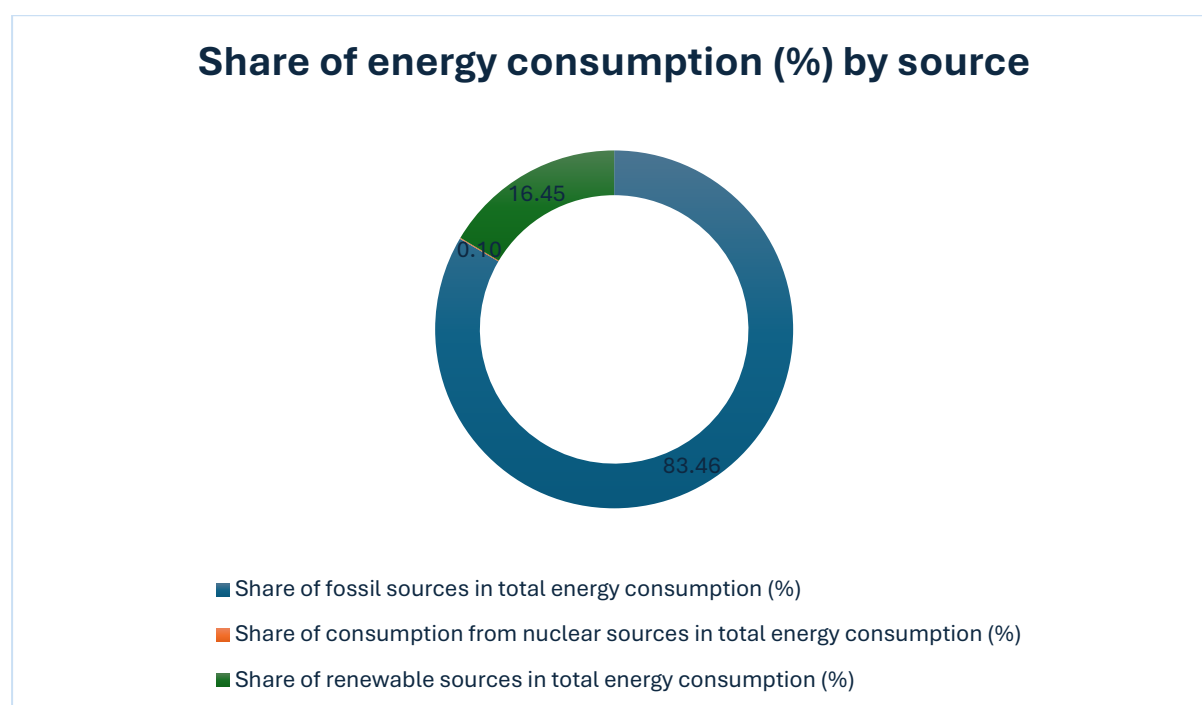


Figure 1: Share of energy consumption from fossil fuels, renewable energy and nuclear

## E1-6

### GHG emissions

GHG emissions calculated and displayed in Table 2, include Scope 1,2 and 3 emissions from all operations that are under the management of Louis PLC as per BP-1 of this report and are considered as the baseline figures for future reporting of year-to-year compatibility.

For future reports, if the definition of what constitutes our company and its value chain, changes, a new definition will be provided.

For the calculations of Scope 1,2 and 3 emissions, the GHG Protocol Corporate standard was used as a general framework which is based on 2006 IPCC Guidelines for National Inventories. Specific emission and conversion factors were used as per national guidelines given by the Environment Department of both Cyprus and Greece, GHG protocol emission factors and the UK Department for Environment, Food & Rural Affairs (DEFRA).

Table 2: GHG Scope 1,2, and 3 Emissions by country and Emission intensity

|                                                        | Cyprus | Greece | Total |
|--------------------------------------------------------|--------|--------|-------|
| <b>Gross Scope 1 GHG emissions (tCO<sub>2</sub>eq)</b> | 2,688  | 335    | 3023  |

|                                                                                |               |              |               |
|--------------------------------------------------------------------------------|---------------|--------------|---------------|
| Scope 1 GHG emissions from regulated emission trading schemes (%)              | -             | -            | -             |
| <b>Gross Scope 2 GHG emissions (tCO<sub>2</sub>eq)</b>                         |               |              | <b>13,794</b> |
| Location based                                                                 | 12,533        | -            | 12,533        |
| Market based                                                                   | -             | 1,261        | 1,261         |
| <b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>        | <b>609</b>    | <b>102</b>   | <b>711</b>    |
| Waste generated in operations                                                  | 399           | 68           | 467           |
| Business travel                                                                | 210           | 34           | 244           |
| <b>Total GHG emissions (tCO<sub>2</sub>eq)</b>                                 | <b>15,830</b> | <b>1,698</b> | <b>17,528</b> |
| Total GHG emissions intensity (tCO <sub>2</sub> e per million EUR net revenue) |               | 136.9        |               |

Scope 1 emissions include emissions resulting from fuel used in our operation and from fluorinated gases from the operation of refrigerators. No Scope 1 GHG emissions fall under regulated trading schemes.

As for Scope 2 emissions, our establishments are located both in Cyprus and Greece, hence emission factors varied per location and electricity provider. In Cyprus, location-based figures were used, while in Greece market-based figures were taken by the country's Renewable Energy Sources & Guarantees of Origin Operator.

For Scope 3 emissions, two categories were identified, namely Category 5 – Waste generated in operations and Category 6 – Business Travel. Appropriate conversion factors were used according to waste type, whether it was recycled or not, or whether it has been used for other purposes i.e. cooking oil collected and transformed into biodiesel. Finally, business air travel was calculated according to km travelled per passenger. Time constraints and unavailable data did not allow us to collect data on other Scope 3 categories, for example employee commuting and guest travelling, but we aim to include such data in future reporting.



# EU Taxonomy of Sustainable Activities Report

## Introduction

### *Background Information*

The primary objective of the EU Action Plan on Sustainable Finance is to direct financial flows towards sustainable investments.

Regulation (EU) 2020/852, enacted by the European Parliament and Council on 18 June 2020, introduces a standardized framework designed to promote sustainable investment practices across the EU. Also known as the “EU Taxonomy”, this regulation establishes clear criteria for classifying economic activities as “environmentally sustainable,” ensuring consistency in sustainability benchmarks and guiding investment decisions toward activities that meet the EU's environmental goals.

This framework identifies six key environmental objectives:

- Climate Change Mitigation
- Climate Change Adaptation
- Sustainable Use and Protection of Water and Marine Resources
- Transition to a Circular Economy
- Pollution Prevention and Control
- Protection and Restoration of Ecosystems and Biodiversity

In respect of that, companies subject to the Corporate Sustainability Reporting Directive (CSRD) are obligated to report on the classification of their activities as environmentally sustainable under the EU Taxonomy. This entails an initial assessment to differentiate between Taxonomy-Eligible and Taxonomy-Aligned activities, ensuring transparency and alignment with EU environmental goals.

### Step 1: Eligibility Assessment

The first step involves determining an activity’s eligibility by evaluating its correspondence with the descriptions set forth in the EU Taxonomy’s delegated acts, in which each eligible activity is linked to specific NACE codes, that serve as a reference to guide the eligibility assessment.

### Step 2: Alignment Assessment

The next step involves assessing whether the taxonomy-eligible activities identified in Step 1 can be classified as taxonomy-aligned, confirming their environmental sustainability. To achieve alignment, each eligible activity must satisfy all the following criteria:

1. Make a substantial contribution to at least one environmental objective by complying with the technical screening criteria outlined in the delegated acts to the EU Taxonomy; and
2. Do no significant harm (DNSH) to the other environmental objectives; and
3. Comply with the minimum safeguards as defined by the OECD Guidelines for

Multinational Enterprises on Responsible Business Conduct and the UN  
Guiding Principles on Business and Human Rights.

### Objective and Scope

Under Article 1(1) of Regulation (EU) 2020/852, the EU Taxonomy applies to companies required to publish non-financial or consolidated non-financial statements, as outlined in Articles 19a and 29a of Directive 2013/34/EU.

In line with these requirements, Louis PLC ("Louis") is obligated to adhere to the Regulation by reporting on specific key performance indicators (KPIs), demonstrating both the eligibility and alignment of its business activities with the EU Taxonomy criteria.

In compliance with the aforementioned requirements, and based on an analysis of Louis' economic activities, this document discloses the ratio of **Turnover**, **Capital Expenditures (CAPEX)**, and **Operating Expenditures (OPEX)** that are **eligible** and **aligned** with the EU Taxonomy for the 2024 fiscal year.

This year's assessment incorporates relevant regulatory updates and evaluates the eligibility and alignment of activities that significantly contribute to the Environmental Objectives specified under **Article 1(1)** of Regulation (EU) 2020/852.

### Main Results

#### KPI's

The eligibility analysis has concluded that 100% of the turnover is considered eligible, 1.9% of the CAPEX is eligible, while OPEX eligibility was set to zero due to immateriality as explained in paragraph 2.2.3.

| SUMMARY           |                  |         |         |
|-------------------|------------------|---------|---------|
| KPI               | Breakdown        | 2024    | 2023    |
|                   |                  | € '000  | € '000  |
| <b>A. Revenue</b> | Revenue          | 128,067 | 114,221 |
|                   | Eligible Revenue | 128,067 | 114,221 |
|                   | % Eligible       | 100%    | 100%    |
|                   | % Non-Eligible   | 0%      | 0%      |
| <b>B. Capex</b>   | CAPEX            | 23,715  | 11,501  |
|                   | Eligible CAPEX   | 474     | 840     |
|                   | % Eligible       | 1.9%    | 7.3%    |
|                   | % Non-Eligible   | 98.1%   | 92.7%   |
| <b>B. Opex</b>    | OPEX             | 2,527   | 2,374   |
|                   | Eligible OPEX    | 0       | 0       |
|                   | % Eligible       | 0%      | 0%      |
|                   | % Non-Eligible   | 0%      | 0%      |

## Turnover (Revenue)

|                                                                         |                |                |                        | SUBSTANTIAL CONTRIBUTION  |                           |                            |                  |           | ABSENCE OF SIGNIFICANT HARM (DNSH) |                           |                            |                  |           |                    | MS                                                     |                              |                                |   |  |
|-------------------------------------------------------------------------|----------------|----------------|------------------------|---------------------------|---------------------------|----------------------------|------------------|-----------|------------------------------------|---------------------------|----------------------------|------------------|-----------|--------------------|--------------------------------------------------------|------------------------------|--------------------------------|---|--|
| Economic Activities                                                     | Activity Codes | Total Turnover | Proportion of Turnover | Climate Change Mitigation | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Climate Change Mitigation          | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Minimum Safeguards | Prior Year Proportion of Taxonomyalignment/eligibility | Category (Enabling Activity) | Category (Transition Activity) |   |  |
|                                                                         |                | €'000          | %                      | %                         | %                         | %                          | %                | %         | Y/N                                | Y/N                       | Y/N                        | Y/N              | Y/N       | Y/N                | Y/N                                                    | %                            | E                              | T |  |
| A. TAXONOMY - ELIGIBLE ACTIVITIES                                       |                |                |                        |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| A.1. Taxonomy Aligned Activities                                        |                |                |                        |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| Portion of Turnover from Aligned Activities                             |                | 0              | 0%                     |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        | 0%                           |                                |   |  |
| A.2. Taxonomy Eligible Activities, but not Aligned                      |                |                |                        |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| Hotel, Holiday, Camping Grounds and Similar Accommodation               | BIO 2.1        | 128,067        | 100%                   | -                         | -                         | -                          | -                | -         | 100%                               |                           |                            |                  |           |                    |                                                        |                              | 100%                           |   |  |
| Portion of Turnover from Eligible but not Aligned Activities            |                | 128,067        | 100%                   | 100%                      |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        | 100%                         |                                |   |  |
| Total CAPEX from Taxonomy-Eligible and Aligned Activities (A.1. + A.2.) |                | 128,067        | 100%                   |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| B. TAXONOMY NON - ELIGIBLE ACTIVITIES                                   |                |                |                        |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| Turnover from Non-Eligible Activities                                   |                | 0              | 0%                     |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |
| C. TOTAL (A + B)                                                        |                | 128,067        | 100%                   |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                        |                              |                                |   |  |

## CAPEX

|                                                                         |                    |             |                     | SUBSTANTIONAL CONTRIBUTION |                           |                            |                  |           |                             | ABSENCE OF SIGNIFICANT HARM (DNSH) |                           |                            |                  |           |                             | MS                 |                                                         |                              |                                |
|-------------------------------------------------------------------------|--------------------|-------------|---------------------|----------------------------|---------------------------|----------------------------|------------------|-----------|-----------------------------|------------------------------------|---------------------------|----------------------------|------------------|-----------|-----------------------------|--------------------|---------------------------------------------------------|------------------------------|--------------------------------|
| Economic Activities                                                     | Activity Codes     | Total CAPEX | Proportion of CAPEX | Climate Change Mitigation  | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Biodiversity and Ecosystems | Climate Change Mitigation          | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Biodiversity and Ecosystems | Minimum Safeguards | Prior Year Proportion of Taxonomy alignment/eligibility | Category (Enabling Activity) | Category (Transition Activity) |
|                                                                         |                    | € '000      | %                   | %                          | %                         | %                          | %                | %         | %                           | Y/N                                | Y/N                       | Y/N                        | Y/N              | Y/N       | Y/N                         | Y/N                | %                                                       | E                            | T                              |
| A. TAXONOMY - ELIGIBLE ACTIVITIES                                       |                    |             |                     |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| A.1. Taxonomy Aligned Activities                                        |                    |             |                     |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| Portion of CAPEX from Aligned Activities                                |                    | 0           | 0%                  |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    | 0%                                                      |                              |                                |
| A.2. Taxonomy Eligible Activities, but not Aligned                      |                    |             |                     |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| Installation, Maintenance and Repair of Energy Efficiency Equipment     | CCM 7.3<br>CCA 7.3 | 214         | 0.9%                | 0.9%                       | 0.9%                      | -                          | -                | -         | -                           |                                    |                           |                            |                  |           |                             |                    | 6.7%                                                    |                              |                                |
| Energy Generation Using Solar Photovoltaic Technology                   | CCM 4.1<br>CCA 4.1 | 98          | 0.4%                | 0.4%                       | 0.4%                      | -                          | -                | -         | -                           |                                    |                           |                            |                  |           |                             |                    | 0.0%                                                    |                              |                                |
| Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles   | CCM 6.5<br>CCA 6.5 | 162         | 0.7%                | 0.7%                       | 0.7%                      | -                          | -                | -         | -                           |                                    |                           |                            |                  |           |                             |                    | 0.6%                                                    |                              |                                |
| Portion of CAPEX from Eligible but not Aligned Activities               |                    | 474         | 1.6%                |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    | 7.3%                                                    |                              |                                |
| Total CAPEX from Taxonomy-Eligible and Aligned Activities (A.1. + A.2.) |                    | 474         | 1.6%                |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| B. TAXONOMY NON - ELIGIBLE ACTIVITIES                                   |                    |             |                     |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| CAPEX from Non-Eligible Activities                                      |                    | 23,241      | 68.1%               |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |
| C. TOTAL (A + B)                                                        |                    | 23,715      | 100%                |                            |                           |                            |                  |           |                             |                                    |                           |                            |                  |           |                             |                    |                                                         |                              |                                |

OPEX\*

|                                                                         |                |            |                    | SUBSTANTIAL CONTRIBUTION  |                           |                            |                  |           | ABSENCE OF SIGNIFICANT HARM (DNSH) |                           |                            |                  |           |                    | MS                                                   |                             |                               |   |
|-------------------------------------------------------------------------|----------------|------------|--------------------|---------------------------|---------------------------|----------------------------|------------------|-----------|------------------------------------|---------------------------|----------------------------|------------------|-----------|--------------------|------------------------------------------------------|-----------------------------|-------------------------------|---|
| Economic Activities                                                     | Activity Codes | Total OPEX | Proportion of OPEX | Climate Change Mitigation | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Climate Change Mitigation          | Climate Change Adaptation | Water and Marine Resources | Circular Economy | Pollution | Minimum Safeguards | Prior Year Proportion of Taxonomyalignment/eligility | Category(Enabling Activity) | Category(Transition Activity) |   |
|                                                                         |                | €'000      | %                  | %                         | %                         | %                          | %                | %         | Y/N                                | Y/N                       | Y/N                        | Y/N              | Y/N       | Y/N                | Y/N                                                  | %                           | E                             | T |
| A. TAXONOMY - ELIGIBLE ACTIVITIES                                       |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| A.1. Taxonomy Aligned Activities                                        |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| Portion of OPEX from Aligned Activities                                 |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| A.2. Taxonomy Eligible Activities, but not Aligned                      |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
|                                                                         |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| Portion of OPEX from Eligible but not Aligned Activities                |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| Total CAPEX from Taxonomy-Eligible and Aligned Activities (A.1. + A.2.) |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| B. TAXONOMY NON - ELIGIBLE ACTIVITIES                                   |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| OPEX from Non-Eligible Activities                                       |                |            |                    |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |
| C. TOTAL (A + B)                                                        |                | 2,527      | 100%               |                           |                           |                            |                  |           |                                    |                           |                            |                  |           |                    |                                                      |                             |                               |   |

\* Materiality exemption was used for the OPEX KPI as explained in section 2.2.3

## Accounting Policies

In accordance with Annex I of the Commission Delegated Regulation supplementing Regulation (EU) 2020/852, the methodology for determining and allocating turnover, investment in fixed assets, and operating expenses to both the numerator and denominator of each reported indicator is outlined below.

### Turnover (Revenue)

The Turnover (Revenue) KPI is defined as the proportion of revenue from eligible or aligned economic activities derived from the annual financial statement for fiscal year 2024.

The income accounts recognized for accounting purposes have been selected in accordance with the International Accounting Standards (IAS1), which outlines the below income line items:

- The ordinary income from contracts with customers recorded in accordance with IFRS 15;
- Other sources of income, when applicable.

The denominator was calculated based on the income statement for fiscal year 2024, summing the total of the pre-defined income items. These income accounts include the following: accommodation, food sales, beverage sales, and other income which reflects management services and rents.

The numerator was also derived from the income statement for fiscal year 2024 but includes only the eligible accounts identified through the EU Taxonomy analysis. Accordingly, the selected accounts used in the calculation of the numerator are those linked to activity “2.1. Hotels, holiday resorts, camping grounds and similar accommodation.”

During fiscal year 2024, Louis recorded a total turnover of €128 million (+ 12% YoY), with 100% generated from taxonomy-eligible activities.

### CAPEX

The CAPEX KPI is defined as the proportion of additions in tangible and intangible assets corresponding to eligible or aligned economic activities and derived from the annual financial statements for fiscal year 2024.

According to the Disclosure Delegated Act, the denominator must be in accordance with the International Financial Reporting Standards (IFRS) adopted by Regulation (EC) No. 1126/2008, as outlined below:

- IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- IAS 40 Investment Property, paragraph 76, letters a) and b), (for the fair value

model);

- IAS 40 Investment Property, paragraph 79, letter d), points i) and ii), (for the cost model);
- IAS 41 Agriculture, paragraph 50, points b) and e);
- IFRS 16 Leases, paragraph 53, point h)

Following the assessment of the Group's CAPEX accounts that are in accordance with the above, the denominator was calculated as follows:

| Additions (€ '000)                     | 2024          | 2023          |
|----------------------------------------|---------------|---------------|
| Property, Plant and Equipment (IAS 16) | 6,232         | 11,403        |
| Intangible Assets (IAS 38)             | 42            | 98            |
| Investment Property (IAS 40)           | 0             | 0             |
| Agriculture Assets (IAS 41)            | 0             | 0             |
| Right-of-Use Assets (IFRS 16)          | 17,441        | 0             |
| <b>Total</b>                           | <b>23,715</b> | <b>11,501</b> |

For the numerator, we have identified capital expenditures related to EU Taxonomy-eligible activities, as detailed in the table below:

| Eligible Activities (€ '000)                                               | 2024       | 2023       |
|----------------------------------------------------------------------------|------------|------------|
| 7.3. Installation, Maintenance and Repair of Energy Efficiency Equipment   | 214        | 773        |
| 4.1. Energy Generation Using Solar Photovoltaic Technology                 | 98         | 0          |
| 6.5. Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles | 162        | 67         |
| <b>Total</b>                                                               | <b>474</b> | <b>840</b> |

During fiscal year 2024, Louis recorded a total CAPEX of €24 million (+ 115% YoY), 1.9% of which was allocated to eligible activities.

## OPEX

The OPEX KPI is defined as the proportion of non-capitalized costs corresponding to eligible or aligned economic activities and derived from the annual financial statement for fiscal year 2024.

As per the EU Taxonomy's Disclosures Delegated Act, the definition of operating expenses is restricted to:

- Research & Development costs
- Short-term lease payments
- Building renovations, maintenance, repairs, and any other direct expenses linked to regular servicing of property, plant, and equipment.

| <b>Taxonomy-Defined Operating Expenses (€ '000)</b>  | <b>2024</b>  | <b>2023</b>  |
|------------------------------------------------------|--------------|--------------|
| R&D                                                  | 0            | 0            |
| Building Renovations, Repairs, and other Maintenance | 2,527        | 2,374        |
| Short-term Leases                                    | 0            | 0            |
| <b>Total</b>                                         | <b>2,527</b> | <b>2,374</b> |

In light of the Group's business operations, the Total Operating Expenses are mainly comprised of Personnel Expenses (49%) and Other Operating Expenses (49%), as outlined below:

| <b>Group Consolidated Operating Expenses (€ '000)</b> | <b>2024</b>   | <b>2023</b>   |
|-------------------------------------------------------|---------------|---------------|
| Personnel Expenses                                    | 43,539        | 40,032        |
| Other Operating Expenses                              | 42,650        | 38,751        |
| Administration Expenses                               | 2,140         | 1,896         |
| <b>Total</b>                                          | <b>88,880</b> | <b>80,679</b> |

Based on the Group's review of the above expenses, the conclusion is that the operating expenses covered by the EU Taxonomy are not significant in relation to the Group's total consolidated operating expenses, i.e., 2.7% of the Group's consolidated operating expenses.

Consequently, and in accordance with Annex I paragraph. 1.1.3.2. of the Disclosures Delegated Act, Louis has applied the materiality exemption option whereby non-financial undertakings are exempted from the calculation of the OPEX KPI numerator if the operating expenses are not material to the business model of the undertaking.

### Double Counting

Louis employs a robust framework to accurately reflect each KPI, ensuring that data is distinguished and non- duplicative. We have implemented control measures at each stage of data gathering and reporting to reinforce the reliability and traceability of our metrics.

This approach not only mitigates the risk of double counting, but also supports precise aggregation of financial information and activity-related KPI's. By adhering to this framework, we ensure that our financial and activity data are in accordance with the Taxonomy Regulation, providing stakeholders with transparent and reliable insights



## Diagnosis of Compliance with Technical Criteria

### Analysis of Activities

| Economic Activity                                                          | Environmental Objective                                   | Description of Activity                                                                                             | KPI Impacted |
|----------------------------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------|
| 2.1. Hotels, Holiday Resorts, Camping Grounds, and Similar Accommodation   | Protection and Restoration of Ecosystems and Biodiversity | Operation of short-stay accommodation establishments, including hotels and short-term apartment rentals.            | Turnover     |
| 7.3. Installation, Maintenance and Repair of Energy Efficiency Equipment   | Climate Change Mitigation Climate Change Adaptation       | Implementation of energy- efficient electromechanical systems, pool machinery, lighting, and audiovisual equipment. | Capex        |
| 4.1 Energy Generation Using Solar Photovoltaic Technology                  | Climate Change Mitigation Climate Change Adaptation       | Installation and generation of electricity from solar photovoltaic systems                                          | Capex        |
| 6.5. Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles | Climate Change Mitigation Climate Change Adaptation       | Purchase of three passenger vehicles, including two hybrid vehicles, to improve fleet sustainability                | Capex        |

Our EU Taxonomy analysis for fiscal year 2024 identified that 100% of Revenue and 1.9% of CAPEX at Louis are eligible. Opex eligibility was set to zero due to the materiality exemption.

### Substantial Contribution Criteria

After identifying the eligible activities above, the Group conducted an alignment analysis to assess compliance with the technical screening criteria for each economic activity in relation to its respective environmental objective(s).

As such, our findings indicated that none of the eligible activities are aligned with the technical screening criteria set out by the EU Taxonomy.

However, Louis is committed to monitoring its turnover and capital expenditure activities to identify future opportunities for alignment with the Taxonomy framework, thereby contributing to broader sustainability objectives in upcoming reporting periods.

### [Do No Significant Harm \(DNSH\) Criteria](#)

The EU Taxonomy's DNSH principle, as outlined in Article 17 of Regulation (EU) 2020/852, ensures that an economic activity qualifying as taxonomy-aligned does not adversely impact any of the six environmental objectives.

Following our conclusion that all activities are eligible but not yet aligned based on the assessment of the substantial contribution criteria, we conducted a preliminary analysis of the DNSH requirements. Despite our extensive initiatives related to the key environmental objectives set out by the EU Taxonomy, this pre-analysis allowed us to identify areas where our compliance with all the DNSH criteria could be further strengthened.

In this regard, Louis will continue to assess the DNSH criteria to better integrate its operations with the environmental objectives specified by the EU Taxonomy. This approach ensures that as we expand our eligible activities and enhance existing ones for alignment, we mitigate any adverse impact on key environmental objectives.

### [Minimum Safeguards](#)

#### [Overview](#)

At the corporate level, the assessment of Minimum Safeguards ensures that Revenue, CAPEX, and OPEX are not deemed sustainable if they result in any adverse social impacts. In other words, while alignment with the EU Taxonomy requires an activity to meet the specific technical screening criteria and the DNSH criteria, it also mandates adherence to minimum social safeguards across the company.

These safeguards, defined in Article 18 of Delegated Regulation 2020/852, focus on four main thematic areas:

- Human Rights
- Corruption and Bribery
- Taxation
- Fair Competition

### [Human Rights](#)

Louis is dedicated to upholding human rights, fostering a workplace based on equality, respect, and cooperation. By encouraging collaboration, it supports employees in reaching their potential and building self-confidence. The Human Resources Department manages related issues and escalates concerns to management as needed.

To further demonstrate our commitment, Louis aims to develop a comprehensive human rights policy covering all principles of employee rights protection and equal opportunities.

*For more details, please refer to section “Protection of Human Rights” of this Report.*

### Corruption and Bribery

Louis is committed to the highest ethical standards and actively combats corruption in all forms, recognizing its harmful impact on society and trust in institutions. We prohibit bribery, extortion, and unethical practices, and strictly adhere to anti-corruption laws globally.

Our comprehensive framework includes due diligence on partners and suppliers, employee training, and strong reporting mechanisms (i.e. Whistleblower Policy). We encourage a culture of openness, enabling employees and stakeholders to report concerns without fear, with thorough investigations ensuring accountability and corrective action.

Further, we do not permit gifts, bribes, kickbacks, or favors intended to influence business transactions or decisions.

*For more details, please refer to section “Anti-Corruption” of this Report.*

### Taxation

As part of our commitment to tax compliance, we are dedicated to responsible and transparent tax practices, fully complying with national and international regulations. We avoid aggressive tax planning, ensuring fair contributions in both jurisdictions in which we operate. Moreover, our tax team, consisting of two external advisors and in-house qualified accountants, ensures daily compliance, timely payments, and clearances.

Regular audits reinforce our commitment to transparency and sustainable practices, supporting our dedication to social responsibility.

### Fair Competition

Louis is committed to supporting a competitive marketplace, upholding free and fair competition principles across all our operations. We strictly prohibit anti-competitive practices, including price-fixing, bid rigging, market sharing, or any abuse of market power, and we require full compliance with applicable antitrust and competition laws.

We ensure that our competitive advantages are achieved solely through fair and lawful means, avoiding any actions that could restrict competition, distort the market, or misuse market position. This commitment reflects our dedication to integrity and ethical business practices in a fair marketplace.

## Water and Marine Resources

---

### E3.IRO-1

#### *Impacts, Risks, and Opportunities (IROs)*

Our reporting on water and marine resources highlights the impact of water consumption across all operations, particularly in hotel units. This involves evaluating our assets and activities to assess their effect on water usage, especially considering the location of our operations in the Mediterranean region, a high and extremely high water-risk area, as per water risk maps ([WWF Water Risk Filter](#), [Aqueduct Water Risk Atlas](#)).

Municipalities were engaged during the IRO assessment as a proxy for Affected communities.

*\*More detailed information regarding this assessment process can be found in sections SBM-2, SBM-3 and IRO-1 of this report.*

| Type                   | IRO               | Description                                                                                                                                                                                                                                                      | Position in the Value Chain | Time Horizon |
|------------------------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Actual Negative Impact | Water Consumption | Given that our establishments are located in the Mediterranean region, a high water-risk area, our operations contribute significantly to water consumption, leading to a negative environmental impact, emphasizing the need for efficient resource management. | O*                          | SML**        |

*\*O= Own Operations, U = Upstream, D = Downstream.*

*\*\*S = Short-term, M = Medium-term, L = Long-term.*

## E3-1

### *Policies*

Louis PLC aims to develop an environmental policy that will address key sustainability matters, including water management in our operations and by extension high water-stress areas. The policy will be published in due course and will align with the company's broader sustainability strategy. The policy will seek to minimize material impacts and risks, implement mitigation measures to enhance resource efficiency and integrate sustainable water management practices across operational sites.

*[For more information, please see section E1-2 on Policies, within this report.]*

## E3-2

### *Actions*

Louis PLC recognizes the importance of sustainable water management, particularly given the high water-risk associated with our locations in the Mediterranean region. To mitigate our impact on water and marine resources, we have outlined a structured action plan spanning the medium and long term for all operations.

#### *Medium-term (up to 5 years)*

- Install pressure control systems for showers and kitchens in all units.
- Assess and replace, if necessary, any water reduction filters which are available at all our hotels.
- Implement wastewater treatment systems in all units.
- Enhance laundry management by educating customers on responsible towel washing practices (e.g., towels will only be replaced if left on the floor).

#### *Long-term (up to 10 years)*

- Introduce sensor-based mixers and toilets to improve water efficiency.

Given the high water-risk nature of our operations, all initiatives detailed above are specifically designed to address water conservation challenges in our establishments.

Engaging guests and hotel staff is an integral element in our efforts to reduce the negative environmental impact through water consumption. We invest in training of staff for efficient water use and encourage guests to reduce water consumption through initiatives such as the replacement of towels only if left on the floor etc.

As mentioned in section E1-3, Louis PLC invested €20k for training purposes, including ISO14001 as well as other training covering a range of environmental issues. Although, no other significant expenditure has been allocated within the current reporting year, we

are continuing our research into water saving techniques to assess efficiency for potential implementation/installation at our hotel units in the future.

### E3-3

#### *Targets*

Following implementation of ESRS reporting, we will be tracking the effectiveness of actions through defined targets, using 2024 figures as a baseline. These targets are directly linked to our negative impact on the environment through our water consumption, ensuring that we manage material impact, related to areas at water risk.

These targets were created by internal stakeholders (Sustainability Team) and approved by Top Management on a voluntary basis (not required by regulation), based on internal understanding on realistic expectations, specifically focused on reducing water consumption, aligning with our commitment to responsible resource use.

- Short-Term (1 year): Maintain water consumption at the baseline year level (2024)
- Medium-Term (5 years): Achieve a 3% reduction in water usage compared to the baseline year.
- Long-Term (10 years): Achieve a 5% reduction in water usage compared to the baseline year.

### E3-4

#### *Water Consumption*

Our total water consumption has been compiled mainly using water bills during the financial year 2024. This approach ensures that our data is as accurate as possible.

Where billing was unavailable, recordings of water meters and - in the case of reverse osmosis- system readings were taken. Extrapolation of data and estimated were not used in the calculation of total water consumption. The data has been verified by the individual Chief Engineers. No information is currently available on water basin's water quality and quantity.

#### *Total Water Consumption & Intensity*

|        | Local Network m <sup>3</sup> | Local Network (Irrigation) m <sup>3</sup> | Groundwater m <sup>3</sup> | Reverse osmosis m <sup>3</sup> | Total m <sup>3</sup> |
|--------|------------------------------|-------------------------------------------|----------------------------|--------------------------------|----------------------|
| Greece | 32,353                       | 3,933                                     | 16,668                     | 22,745                         | 75,699               |
| Cyprus | 388,518                      | 18,144                                    | 0                          | 0                              | 406,662              |
|        |                              |                                           |                            |                                |                      |
| Total  | 420,871                      | 22,077                                    | 16,668                     | 22,745                         | 482,361              |

Water Intensity = 3,768 m3 per million EUR net revenue

## Biodiversity and Ecosystems

---

### E4.SBM-3

At Louis PLC, we recognize the importance of protecting biodiversity and minimizing environmental impact, particularly in areas near protected ecosystems. Our material sites, as identified in ESRS 2, include establishments located within or near Natura 2000 designated areas, a European ecological network dedicated to preserving threatened species and habitats.

#### *Sites Near or Within Protected Areas*

##### **Cyprus**

- **Polis 1907** – Approx. 300m from Skoulli area(CY4000009)
- **Nausicaa Beach** – Approx. 230m from Nisia sea area (CY3000006)
- **Louis Phaethon Beach, Ivy Mare, Louis Ledra Beach, and Louis Imperial Beach Hotel** – Located 1-2 km from the marine protected sea area “Moulia”

##### **Greece**

- **Louis Ionian Sun** – Approx. 45m from from Kanoni to Mesogi coastal sea zone (GR2230005) in Corfu
- **Asterion Suites & Spa** – Located within Rodopou peninsula – Maleme beach (GR4340003)

### E4.IRO-1

#### *Impacts, Risks, and Opportunities (IROs)*

We rely on internal expertise and external biodiversity sources such as Natura 2000 Viewer (Natura 2000 map of protected areas). Based on current information a potential negative impact has been identified.

| Type                      | IRO                                 | Description                                                                                                           | Position in the Value Chain | Time Horizon |
|---------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Potential Negative Impact | Habitat destruction & fragmentation | Beach facilities like sunbeds, umbrellas and beach sports, resulting in habitat destruction, disturbance of migration | OD*                         | ML**         |

|  |  |                                                   |  |  |
|--|--|---------------------------------------------------|--|--|
|  |  | patterns, and the loss of native flora and fauna. |  |  |
|--|--|---------------------------------------------------|--|--|

*\*O= Own Operations, U = Upstream, D = Downstream.*

*\*\*S = Short-term, M = Medium-term, L = Long-term.*

Environmental Impact Assessments (EIA), concerning the impact of hotel units on the local biodiversity and ecosystems have not been conducted, therefore the assessment process of impacts risks and opportunities was conducted based on internal knowledge, and publicly available information. Although there is currently no quantifiable proof that our activities actually negatively affect biodiversity sensitive areas, we pay particular attention to potential disturbances to turtle hatching sites. Asterion Suites & Spa in Chania, Crete, shares its beachfront with the protected loggerhead sea turtles and efforts have been made to minimize any interference. Additionally, Louis Ionian Sun is located 45m from a Natura 2000 area where rich meadows of Posidonia Oceanica attracts among others, Green turtles who use the area for feeding purposes, therefore negative interference with hotel guests can have an impact on the species.

NGOs and local communities were involved in the assessment process of sustainability matters, but not directly involved in the identification of impacts, risks and opportunities related to biodiversity and ecosystems.

Certain actions are already in place, in an effort to mitigate the potential negative impact on biodiversity, however with limited information and lack of quantifiable data, it has not yet been concluded if further measures are necessary.

## E4-2

### *Policies*

We aim to develop and publish an environmental policy addressing a number of key sustainability issues, including biodiversity and ecosystems. The policy will be published in due course, to align with the established initiatives to protect and preserve biodiversity.

*[For more information, please see section E1-2 on Policies, within this report.]*

## E4-3

### *Actions*

Although we have not yet developed a formal action plan or dedicated resources for biodiversity management, we are actively working to minimize our impact and raise awareness among employees and guests.

*Current Efforts to Mitigate Impact through avoidance, minimisation and awareness (for all our establishments unless otherwise specified)*



- **Turtle Protection Measures:** At seaside hotels where turtle nesting occurs, we ensure that sunbeds, umbrellas and beach sports activities are removed or restricted during the hatching season to prevent interference and discourage guests from using the beach during these times.
- **Beach Cleaning Initiatives:** Regular cleanups help reduce waste to protect coastal ecosystems and in the case of Asterion, reduce impact on turtles.
- **Wildlife Conservation in Hotel Gardens:** We plant and grow native flora in our gardens, and provide food for stray animals within the premises.
- **Education and Awareness:** We provide notices and leaflets in public areas to raise awareness and educate guests on local biodiversity to reduce the risk of negative interactions.

As mentioned in section E1-3, Louis PLC invested €20k for training purposes, including ISO14001 as well as other training covering a range of environmental issues. No other specific monetary amount has been dedicated for the above actions and biodiversity offsets.

#### E4-4

##### *Tracking effectiveness of policies and actions through targets*

Formal targets for tracking biodiversity and ecosystem-related impacts have not yet been established. We remain dedicated to our consistent and continuous efforts, to minimize disturbance.

Limited national biodiversity data and time constraints have delayed the development of a comprehensive strategy with set targets. However, we recognize the importance of measuring our impact and plan to integrate biodiversity goals into our long-term sustainability strategy. Our consistent conservation initiatives have successfully minimized disturbances, as evidenced by the species' continued return to the same beach for nesting.

#### E4-5

##### *Sites in or Near Protected Areas or Key Biodiversity Areas*

As mentioned, some of our hotels are located near biodiversity-sensitive areas, including Natura 2000 sites (*disclosed in E4.SBM-3*). However, there is no evidence that any of our hotel units negatively impact biodiversity. Our operations are carefully managed to minimize environmental impact, and we remain committed to protecting local ecosystems.

## Circular Economy

### E5.IRO-1

#### *Impacts, Risks, and Opportunities (IROs)*

At Louis PLC, we have conducted an initial assessment of our own operations to identify and assess impacts, risks and opportunities related to the resource use and circular economy. Through the assessment it was evident that waste generation should be our main area of focus.

Although, consultations with affected communities have not been conducted to assess our resource use and impact on circular economy, stakeholders such as NGOs and local communities were involved in the assessment process of sustainability matters, as explained through our DMA process.

| Type                    | IRO                 | Description                                                                                                                                                    | Position in the Value Chain | Time Horizon |
|-------------------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Actual Negative Impacts | Solid Waste         | Actual generation of general waste, plastic, paper and glass waste, from all company operations.                                                               | O*                          | ML**         |
|                         | Food Waste          | Food waste generated from hotel restaurants and breakfast buffets.                                                                                             | O*                          | SM**         |
| Opportunities           | Food Waste Analysis | Conducting food waste analysis will help identify inefficiencies, improve purchasing decisions and promote environmental responsibility within our operations. | O*                          | ML**         |

\*O= Own Operations, U = Upstream, D = Downstream.

*\*\*S = Short-term, M = Medium-term, L = Long-term.*

## E5-1

### *Policies*

As previously mentioned, we aim to develop and publish our environmental policy in due course, which will address key sustainability priorities, including waste management. This policy will provide a structured framework to enhance resource efficiency and strengthen environmental stewardship across our operations.

Since the policy is still in development, specific commitments have not yet been finalized. However, our long-term objective remains to integrate circular economy principles into our operations.

*[For more information, please see section E1-2 on Policies, within this report.]*

## E5-2

### *Actions*

Louis PLC recognises the importance of responsible resource use and the transition towards a circular economy as key element of its sustainability strategy. In alignment with these priorities, we have developed a plan of actions to be implemented over the short, medium and long-term.

The scope of our actions include all our units and operations unless otherwise specified.

#### *Short-Term (up to 1 year)*

- Develop metrics, units and methods for waste collection to improve the accuracy of data gathered.
- Identify the number and locations of recycling facilities available within the hotels to enhance waste management monitoring.
- Implement the reuse of HACCP-appropriate food through donation programs.
- Reduce food waste and promote sustainability awareness among guests, supported by an investment of approximately €50,000 in organic waste separation and measurement technology in the 2025 financial year for a number of our units.
- Align practices with national and EU legislation on single-use products.
- Replace plastic straws in bars and restaurants with biodegradable vegetable fibre alternatives.
- Conduct market research to identify suppliers offering more sustainable products, focusing on items that are resilient, have a longer lifespan, are reusable, or are made from upcycled materials.

- Introduce paperless welcome letters for guests, accessible via in-room TVs and the mobile application for the majority of our units.
- Develop an e-waste management policy tailored to specific types of electronic waste (e.g. bulbs, batteries, TVs), along with the provision of designated disposal bins.
- Provide battery disposal bins in each hotel, conveniently located for housekeepers and maintenance teams.
- Identify and assess chemicals that are wasted during operations.
- Collect, store and analyse data on linen replacement frequencies and quantities to optimise resource use.

#### *Medium-Term (up to 5 years)*

- Transition to suppliers that provide biodegradable chemical products
- Launch an internal awareness campaign for employees on recycling and develop a formal recycling policy.
- Install three-section bins in rooms to facilitate the separation of PMD (Plastic/Metal/Drink cartons), paper, and general waste.
- Integrate sustainability standards and certifications when consulting on and purchasing materials for furniture.
- Launch an awareness campaign for guests focused on recycling, aimed at increasing the percentage of waste recycled and promoting the company's environmentally friendly culture.

#### *Long-term (up to 10 years)*

- Install on-site composting facilities in at least one of our units to process organic waste generated by hotel operations, reducing the amount of waste sent to landfills.

Additionally, as mentioned in section E1-3, Louis PLC invested €20k for training purposes, including ISO14001 as well as other training covering a range of environmental issues.

## **E5-3**

### *Targets*

With the implementation of organic waste measurement technology, at a number of our establishments, we aim to set measurable targets on food waste generation, allowing for more informed purchases and resource use reduction.

Due to the lack of consistent measurable metrics and variety of different waste contracts, development of outcome-oriented targets has not been possible thus far. We aim to utilise the information provided within this report and as per ESRS, to set targets

focused on waste generation using 2024 levels as a baseline year, apart from food waste. Targets related to food waste will only be developed once the food waste technology is implemented, allowing us to produce more reliable metrics. Currently the effectiveness of our actions cannot be tracked.

## E5-5

### *Resource Outflows*

Louis PLC recognizes the importance of waste tracking and management for sustainability but has not yet established a structured reporting framework.

| Type                                                                      | Materials present in waste                                                                                                                                                                             | Waste generated*** | unit |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|------|
| Total waste generated                                                     | General waste (20 03 02), cooking oil (20 01 25), Food waste (20 01 08), PMD, Glass, Paper, Garden waste, Wood, WEEE. Hazardous batteries and accumulators, printer inks, fluorescent tubes            | 2,774.5            | tn   |
| Total NH* waste generated                                                 | General waste (20 03 02), cooking oil (20 01 25), Food waste (20 01 08), PMD, Glass, Paper, Garden waste, Wood, WEEE                                                                                   | 2,774.4            | tn   |
| Total H** waste generated                                                 | Hazardous batteries and accumulators, printer inks, fluorescent tubes                                                                                                                                  | 0.13               | tn   |
| NH Waste diverted from disposal (recycling and other recovery operations) | Cooking oil (20 01 25), PMD, Glass, Paper, Garden waste, WEEE                                                                                                                                          | 768.1              | tn   |
| Recycled Cooking oil                                                      | (EWC 20 01 25)                                                                                                                                                                                         | 32.5               | tn   |
| H Waste diverted from disposal (recycling and other recovery operations)  | Hazardous batteries and accumulators, printer inks, fluorescent tubes                                                                                                                                  | 0.124              | tn   |
| NH waste generated for disposal                                           | General waste (20 03 02), Cooking oil (20 01 25), Food waste (20 01 08), Non recycled PMD, non-recycled wood, non-recycled paper                                                                       | 2,006.3            | tn   |
| Food Waste for disposal                                                   | (EWC 20 01 08)                                                                                                                                                                                         | 641.3              | tn   |
| Cooking oil for disposal                                                  | (EWC 20 01 25)                                                                                                                                                                                         | 7.5                | tn   |
| H waste generated for disposal                                            | Hazardous batteries and accumulators only (other Hazardous waste recorded was send for processing/recycling)                                                                                           | 0.005              | tn   |
| Non recycled waste                                                        | H & NH waste sent for disposal (Hazardous batteries and accumulators, General waste (20 03 02), Cooking oil (20 01 25), Food Waste (20 01 08), Non recycled PMD, non-recycled wood, non-recycled paper | 2,006.3            | tn   |

|                               |  |      |   |
|-------------------------------|--|------|---|
| Non-recycled waste percentage |  | 72.3 | % |
|-------------------------------|--|------|---|

*\*NH – Non Hazardous*

*\*\*H – Hazardous*

*\*\*\*Results are presented to the nearest decimal*

Please Note: Currently, waste reported is based on estimations. Where possible, waste data was provided by municipalities and through waste compactor records and number of collections. Due to the lack of reliable data, the general waste stream was calculated using the above-mentioned sources, from the relevant units and applied to all hotel establishments based on bed nights, which carries a high degree of measurement uncertainty as it is assumed that all hotel units produce the same amount of waste on average and as per bed night. Similarly, other waste stream data also carries a high degree of measurement uncertainty due to inconsistent tracking methods and the absence of standardized data collection processes.

Where general waste data or estimations were unavailable, a calculation based on bed nights was applied to the units, based on an average per bed night calculated from the units which were able to provide adequate evidence.

In some cases general waste data was calculated based on the size of the compactor/bin on site and the number of collections. In a number of cases data was unavailable and no estimation was possible. No waste information available for Head offices and restaurants with the exception of some cooking oil data and general waste

Currently there is no information as to the processes followed by each transfer station unit and whether material sent to them is intended for recycling, reuse or recovery. This varies depending on the transfer station permit.

No waste was sent directly for incineration or other disposal operations.

## Social

### Own Workforce

#### S1.SBM-3

The workforce comprises both seasonal and permanent hotel employees/staff

(accountants, administration staff, receptionists, housekeeping, kitchen staff, maintenance, waiters) and permanent office employees/staff in Finance, Operations, Administration and Commercial departments.

During the process of identification of impacts, risks and opportunities, the following were identified as material:

| Type  | IRO                                                         | Description                                                                                                                                                                               | Position in the Value Chain | Time Horizon |
|-------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Risks | Occupational H&S                                            | Without appropriate training and precautions or adequate insurance coverage, occupational H&S incidents can pose a financial risk to the company due to insurance and legal repercussions | O*                          | S**          |
|       | Seasonality of staff                                        | New recruits every year can lead to loss of expertise, while there is a constant need for new staff training                                                                              | O*                          | SM**         |
|       | Collective bargaining agreements and freedom of association | Allows staff to have a major impact on company operations                                                                                                                                 | OU*                         | SM**         |

|  |                                                                |                                                                                                                                              |    |      |
|--|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|----|------|
|  |                                                                | through protests                                                                                                                             |    |      |
|  | Staff shortage and recruitment issues due to geopolitical risk | Limiting the availability of staff from nearby countries                                                                                     | U* | M**  |
|  | Cyber security / Cyber-attacks                                 | Loss of information risking the cyber-safety of employees, can lead to potential legal action with financial and reputational consequences   | O* | SM** |
|  | GDPR                                                           | Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences. | O* | SM** |

\*O= Own Operations, U = Upstream, D = Downstream.

\*\*S = Short-term, M = Medium-term, L = Long-term.

Hotel staff is more prone to occupational H&S incidents although the risk of such incidents includes all employees. The risk related to Collective Bargaining agreements refers to all employees covered by such agreements. Cybersecurity and GDPR risks arise from all employees and all employee data.

## S1-1

### *Policies*

At Louis PLC, our policies, which are aligned with international standards, as described below, apply to all staff members and all operations and functions of the company.

The thorough preparation for ESRS reporting provides an opportunity to identify gaps and key focus areas based on material topics to create comprehensive policies on



topics that have not yet been addressed by our current official policies and procedures. In the case of Staff seasonality and Employee shortage, the company has applied specific actions to tackle these issues, and a policy is not considered necessary.

### Code of Business Conduct and Ethics

We uphold human rights and inclusivity through our Code of Business Conduct & Ethics. Through strict adherence to our Code, we strictly prohibit discrimination on the basis of race, gender, disability, age, religion or political beliefs. Compliance with union regulations and labour laws is a core part of this commitment, to advance diversity and inclusion.

Louis PLC actively promotes diversity and supports underrepresented groups by offering equal professional development opportunities and fostering inclusive workplace policies. The company also enforces a whistleblower protection policy and a Business Code of Conduct and Ethics, allowing employees to report issues anonymously without fear of retaliation. Employees can confidentially report concerns through our whistleblower system, which ensures that every report is thoroughly investigated and leads to continuous improvement in our practices.

Zero-tolerance against discrimination and harassment is stated within our Code of Conduct and is supported by structured grievance channels. Employees report concerns through designated mechanisms, ensuring confidentiality and timely resolution.

Employees may escalate concerns from their Head of Department to senior management. Minor infractions result in verbal warnings, while repeated or serious offenses such as theft or bullying lead to dismissal. Each employee receives a '*Code of Conduct*' handbook outlining workplace expectations and disciplinary regulations.

The most senior level in the company responsible for the implementation of the Code is the Chairman.

### Collective bargaining agreement

The majority of employees at Louis PLC are subjected to Collective Agreements, which addresses the general provisions of the employment terms and conditions, such as working hours, wages, salary increases, annual leaves, holidays, employment conditions, termination of employment, funds, benefits and collaboration between trade unions and the employers. All employees who work outside the collective agreement, sign contracts or agree to work under the standards that follow the national labour laws.

## Health & Safety Policy

Although Louis PLC does not currently have an official H&S policy, the company adheres to the relevant H&S legislation through extensive procedures in place for a wide variety of incidents. A number of our establishments have been certified with ISO22000 and ISO 45001, while the standards are also implemented at the rest of our units without certification.

A H&S policy is to be developed in due course to include all current relevant procedures and standards followed.

## Information Security

The Information Security Policy defines a structured framework for the processing of information, including the purpose of processing, the parties with whom the information is shared and a description of the individuals rights regarding their personal data. The framework has been developed to include a number of policies, such as the Data Retention Policy and the Data Protection and Privacy Policy.

The scope of the policy covers all employees of the group, as well as the contractors, suppliers and third parties with access to Louis PLC's information systems, infrastructure and data. The policy also applies across all business operations and geographical locations where Louis PLC exercises management of responsibility over facilities, systems and information assets.

Accountability for the Information Security Policy lies with the Chief Executive Officer (CEO), with operational oversight delegated to the Chief Information Officer (CIO). The Information Security Department (ISD) and the Risk Management Committee provide guidance to Information Security Officer (ISO) and Data Protection Officer (DPO) to support policy implementation and monitoring of the policy. The policy is reviewed quarterly by the committee to address any preventive and corrective measures as required.

Relevant internal stakeholders, including representatives from IT, Operations, and Data Protection, are actively involved in the development and review of the policy through the Risk Management Committee. The policy is also updated whenever there is a substantiated business need, or at a minimum, reviewed annually to ensure its continued relevance and compliance.

The Information Security Policy is made available to all employees through the company's internal Policy Portal and is reinforced through mandatory training provided via the Security Awareness Platform.

### *Data Retention Policy*

Through the Data Retention Policy, the company ensures that personal records are retained in accordance with Regulation (EU) 2016/679 on GDPR, determining appropriate retention periods to ensure that the data is not kept longer than necessary for its intended purpose. It includes detailed procedures for secure destruction, suspension of deletion in the case of legal proceedings and documentation of destruction processes.

The retention periods are defined through Record of Processing Activities (RPAs), which specifies the data categories, purpose of processing, legal basis and storage durations.

The policy applies across all departments and legal entities under Louis PLC and covers all documents or other information obtained or generated, owned by or in the possession of the group or entities over which the company has control.

Louis PLC management monitors compliance with this policy through various methods, including periodic walkthroughs, random system monitoring, business tool reports, internal and external audits, and feedback to the policy owner. Accountability for the effective implementation and oversight of the policy is the responsibility of the IT Manager and Data Protection Officer (DPO). They are responsible for ensuring that the policy is applied consistently across the Group, that the records are retained and destroyed in line with the applicable retention schedules and that policy violations are addressed through internal measures.

Stakeholders involved in maintaining and reviewing the policy include IT, legal and compliance teams, who contribute through the company's Data Protection governance framework. The policy is made available to internal stakeholders via the company's document management system, reinforced through training and onboarding, and referenced in employee privacy notices.

### *Data Protection and Privacy Policy*

Louis PLC's Data Protection and Privacy Policy applies to all entities, business units, employees, contractors, consultants and third-party data users operating under the Group's control across all jurisdictions. It applies to all personal data processed in the context of employment, service provision, client relationships and corporate operations, covering data in physical, electronic and cloud-based formats. The policy is aligned with Regulation (EU) 2016/679 on GDPR and National law 125(I)/2018 on Protection of the Individuals with regard to the Processing of Personal Data and the Free Movement of such Data.

It incorporates the use of Records of Processing Activities (RPAs), the performance of Data Protection Impact Assessments (DPIAs) and the facilitation of Subject Rights Requests (SRRs) such as access, rectification, erasure and data portability.

To this end, the Group's responsibilities include:

- Processing personal data lawfully, fairly and transparently
- Collecting data for explicit and legitimate purposes
- Ensuring data minimisation and accuracy
- Retaining data only as long as necessary
- Implementing strong security measures to maintain integrity and confidentiality

The accountable parties for the implementation and enforcement of the policy are Data Protection Officer (DPO) and the Group's Executive Management. The DPO is an appointed independent role tasked with ensuring compliance, advising on data protection obligations, overseeing DPIAs and acting as the contact point for supervisory authorities. The DPO reports regularly to executive management and coordinates the organisation's privacy governance framework.

Louis PLC management monitors compliance with this policy as security policy through periodic walkthroughs, random system monitoring, business tool reports, internal and external audits and feedback to the policy owner.

The policy's development and review involve collaboration between legal, IT, compliance, HR, and business unit leaders, with further coordination taking place through the Data Protection Forum (DP Forum) chaired by the DPO. The policy is accessible to all staff through the internal documentation system and is introduced during onboarding and reinforced through mandatory data protection training.

### Human Rights

Louis PLC respects human rights and addresses potential adverse impacts through due diligence and grievance mechanisms aligned with internationally recognized instruments, such as the United Nations Guiding Principles on Business and Human Rights. The company takes appropriate actions, identifies risks and provides remedies where human rights violations occur or negative impacts are identified, including providing remedies such as compensation, healthcare services and other forms of support to the affected parties. Louis PLC also engages with relevant stakeholders and external parties, where appropriate, to improve these mechanisms and monitors their effectiveness through internal reviews.

To further strengthen its commitment to ethical business practices, Louis PLC aims to develop a human rights policy that will extend protections to guests. This policy will be aligned with UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises will be publicly available in due course.

In 2024, no cases of non-compliance with UN, ILO, or OECD guidelines were recorded, reaffirming the company's dedication to ethical and sustainable business practices.

## S1-4

### *Managing Risks*

In our efforts to mitigate the material risks identified and in addition to the mentioned policies, we invest in training and development, offering onboarding, mentorship and continuous skill-building. Leadership programs complement job-specific training.

We aim to expand training for evolving industry demands, strengthen digital initiatives for efficiency and improve feedback mechanisms for workforce development. Integrating sustainability into workforce policies ensures a thriving and ethical workplace.

### *Attracting and retaining staff (addressing seasonality and shortages)*

The company implements fair employment policies, providing social insurance, GESY healthcare, provident fund contributions, a 13th salary, annual leave, free meals, uniforms and career growth opportunities, based on contractual agreements.

Louis PLC follows an equitable, merit-based recruitment process in compliance with labour laws. New employees undergo a structured onboarding process, including induction seminars to familiarize themselves with our policies, procedures and corporate culture, orientation programs, training in workplace safety and hygiene and access to an anonymous suggestion box for feedback.

Established in 2007, the employee wellbeing fund supports employee well-being through financial assistance and incentives, including travel opportunities to boost workplace motivation and productivity.

The company complies with the terms set out by the collective bargaining agreements for work-life balance and wages and constantly invests in employee training in an effort to enhance relationships with seasonal staff, encouraging them to return during the following season.

Additionally, the company collaborates with global partners to mitigate the risk of employee shortages due to geopolitical risk, by engaging in university and recruitment agency collaborations.

### *Health and Safety*

Extensive staff training on H&S procedures, evacuation procedures, fire procedures and use of extinguishers, are vital for the protection of all our staff and guests and we have expanded the compulsory employer's liability coverage to mitigate the magnitude of potential H&S risks.

We monitor employment conditions through structured policies and initiatives. A number of our establishments are certified with ISO45001 Occupational Health and Safety, ISO22000 - Food Safety Management and ISO9001- Quality Management Systems. While not all units have been certified, Louis PLC's integrated occupational Health and Safety system adheres to ISO45001 for all hotel units as per the relevant national law, covering 100% for all hotel employees. Each hotel unit is overseen by a dedicated full-time Health and Safety officer who monitors and enhances our performance in this area. Extensive risk management assessments for potential health and safety incidents provide clear understanding into the potential dangers and people that could be affected, allowing for the creation of prevention measures, which are again assessed for effectiveness.

All safety and security measures fall under the responsibilities of the Health and Safety Officer, who coordinates and monitors the Health and Safety Committee, along with the Executive of the Health and Safety Committee, who is responsible for notifying the Company's top management of such matters. Our risk assessment procedures are assured by the governmental Department of Labour Inspection.

To emphasize the importance of Health & Safety, we have established dedicated committees across our operations and have an Emergency Action Plan for handling a number of emergencies, including but not limited to: earthquakes, fires, accidents, evacuation, food poisoning and many more. We conduct regular readiness exercises to prepare for a range of Health & Safety emergencies and have adequate insurance coverage in case of disasters, continuously enhancing our preparedness for emerging risks and reinforcing our dedication to safe environments.

Our ultimate goal is zero accidents and zero fatalities. To this end, we track effectiveness of actions through records of all incidents, regardless of severity and conduct annual analyses to gain insights into their causes and impacts.

We have dedicated €1,460,000 2025 CapEx for the improvement of fire systems at eight hotel units, following Fire Brigade inspections. In 2024, €60k was dedicated for H&S training at our hotel units including food safety. No other recorded CapEx/OpEx has been dedicated or planned for any other actions.

### Information Security

Louis PLC implements a range of actions to ensure the effective application of its Information Security Policy, to mitigate data breach and cybersecurity risks. Regular risk assessments are carried out, with information security risks being reviewed quarterly by the Risk Management Committee. Preventive and corrective actions are taken where necessary, including technical controls, system monitoring, and breach response procedures.

The company ensures that relevant staff is adequately trained in data handling, participate in digital training programs, through our Security Awareness Platform. The platform also offers protection against phishing and additional security controls. Employee data is kept on our SAP payroll system, with appropriate security measures.

The Data Protection Forum (DP Forum), chaired by the DPO, meets quarterly and includes representation from Legal, IT, and Divisional Data Protection Champions. The forum serves as the Group's main mechanism for cross-functional governance, oversight of privacy risks and implementation of action plans.

### *Cyberattacks*

In the event of a cyberattack, Louis PLC has developed a comprehensive "Action Plan of Hotels in case of Possible Operation of Hotels Without Computerized Systems, due to Cyber Attack by Hackers". This plan outlines a series of steps to be taken immediately after an attack, including the temporary shutdown of all computer systems and emails, and with the hotels operating without these systems for up to 48 hours. The action plan aims to minimize any negative effect concerning any data, while ensuring that day-to-day guest services continue seamlessly and remain unaffected, with specific responsibilities for specific departments such as the Front Office & Back Office / Reservation, Accounting, Housekeeping, etc.

### *Data Retention*

In accordance with the relevant regulation, our internal digital system for Records of Processing Activities, which provides the location of data and the relevant time periods these data should be kept, are reviewed on an annual basis by each Process Owner and further reviewed by the Data Protection Officer. An annual review ensures that all data retention periods remain appropriate and aligned with applicable legal and operational requirements.

Secure destruction procedures are applied systematically for records that have reached the end of their retention. Compliance with the policy is monitored through internal controls (periodic system checks, audits). Corrective actions are undertaken in cases of non-compliance, under the supervision of the IT Manager and the DPO.

Regular trainings are carried out to ensure that employees handling personal data comply with the data retention requirements. These activities form part of onboarding processes and are reinforced through ongoing training modules.

### *Data Protection*

Louis PLC operates under a structured Data Protection Operating Model (DPOM), encompassing twelve core processes designed to implement the Group's data protection obligations under the General Data Protection Regulation (GDPR) and Cyprus Law 125(I)/2018. These processes include breach management, Subject Rights

Requests (SRRs), Data Protection Impact Assessments (DPIAs), data retention monitoring, and compliance oversight. All business units are required to maintain a Record of Processing Activities (RPA), reviewed and signed off annually and centrally monitored by the Data Protection Officer (DPO). This ensures transparency of purpose, lawful processing, and data minimisation. The above procedures are audited by an external assurance provider.

DPIAs are conducted across all business units to identify and mitigate risks prior to initiating high-risk processing activities. These assessments are logged in a central register maintained by the DPO. Additionally, Privacy by Design and Default is integrated into all new or modified systems and processes that involve personal data, embedding technical and organisational safeguards from the outset.

The Subject Rights Request procedure includes defined responsibilities for request validation, interdepartmental coordination and direct communication with the data subject. All requests submitted by employees are formally logged and tracked in a central register maintained by the DPO. Requests are processed within the GDPR-mandated one-month timeframe. The DPO periodically reviews SRR processing to improve efficiency and ensure full compliance. A formally adopted SRR Procedure guides internal workflows and escalation steps, involving cooperation between HR, IT, and Legal functions.

Employee data protection is governed by the Employee Privacy Notice, which outlines the purposes of processing, data sharing practices and employee rights under GDPR. The notice specifies how personal data may be shared with third parties—such as government departments, financial institutions, auditors, or IT providers—for employment, administrative, or legal purposes. The company ensures that all such data sharing is compliant with applicable laws and supported by appropriate safeguards.

## S1-5

### *Targets*

The company's core focus remains on adhering to policies, preventing H&S incidents and avoiding data breaches through existing and enhanced procedures. We are dedicated to continuously improving our business relationships with our employees, ensuring their needs are met through collective bargaining agreements and staff receive frequent and adequate training for all employees whether permanent or seasonal.

The effectiveness of policies and actions is measured through the recorded cases of H&S incidents, data breaches and employee complaints.

Louis PLC continuously assesses impacts, risks, and opportunities to align with business priorities and policies. The Louis Hotels Sustainability Team, comprising



employees from various departments, leads these efforts with oversight from the Sustainability Committee. Workforce representatives actively contribute to sustainability goals, ensuring key initiatives reflect employee input. Such collective efforts have facilitated the development of specific targets related to social initiatives, particularly in the domains of occupational health & guest safety, employment practices, employee turnover, training & education. Key focus areas include fostering a safe workplace culture under ISO 45001:2018, maintaining ISO 22000:2018 food safety standards through regular audits, implementing continuous training, and upholding equal opportunity employment, diversity, and transparent recruitment policies.

#### Outcome oriented Targets:

Short Term (1-year): Occupational H&S incidents - same level as the baseline year (2024).

Medium Term (5-year): 3% reduction in Occupational H&S Related instances compared to the baseline year.

Long Term (10-year): 5% reduction in Occupational H&S Related instances compared to the baseline year.

## S1-6

### *Workforce Demographics*

Employee data is collected through payroll records, with numbers representing headcount at the end of the reporting period. Due to the nature of the business, a large number of our establishments only operates on a seasonal basis, as such a large proportion of our employees are employed on a seasonal basis. The data represents headcount as of 31 December 2024, while during the peak season the headcount is substantially higher.

#### *Employee Headcount by Gender and Region*

| Gender       | Greece | Cyprus |
|--------------|--------|--------|
| Male         | 246    | 763    |
| Female       | 204    | 865    |
| Other        | 0      | 0      |
| Not reported | 0      | 0      |
| Total        | 450    | 1,628  |

#### *Employment Contract Type by Gender and Region*

| Employees by contract type and gender |      |       |               |       |        |      |       |               |       |       |
|---------------------------------------|------|-------|---------------|-------|--------|------|-------|---------------|-------|-------|
| Cyprus                                |      |       |               |       | Greece |      |       |               |       | Total |
| FEMALE                                | MALE | OTHER | NOT DISCLOSED | TOTAL | FEMALE | MALE | OTHER | NOT DISCLOSED | TOTAL |       |

|                                                              |     |   |   |       |     |     |   |   |     |       |
|--------------------------------------------------------------|-----|---|---|-------|-----|-----|---|---|-----|-------|
| <b>Number of employees (head count)</b>                      |     |   |   |       |     |     |   |   |     |       |
| 763                                                          | 865 | 0 | 0 | 1,628 | 204 | 246 | 0 | 0 | 450 | 2,078 |
| <b>Number of permanent employees (head count)</b>            |     |   |   |       |     |     |   |   |     |       |
| 589                                                          | 667 | 0 | 0 | 1,256 | 6   | 19  | 0 | 0 | 25  | 1,281 |
| <b>Number of temporary employees (head count)</b>            |     |   |   |       |     |     |   |   |     |       |
| 174                                                          | 198 | 0 | 0 | 372   | 198 | 227 | 0 | 0 | 425 | 797   |
| <b>Number of non-guaranteed hours employees (head count)</b> |     |   |   |       |     |     |   |   |     |       |
| 0                                                            | 0   | 0 | 0 | 0     | 0   | 0   | 0 | 0 | 0   | 0     |
| <b>Number of full-time employees (head count)</b>            |     |   |   |       |     |     |   |   |     |       |
| 763                                                          | 865 | 0 | 0 | 1,628 | 204 | 246 | 0 | 0 | 450 | 2,078 |
| <b>Number of part-time employees (head count)</b>            |     |   |   |       |     |     |   |   |     |       |
| 15                                                           | 16  | 0 | 0 | 31    | 0   | 0   | 0 | 0 | 0   | 31    |

*The data represents headcount during the year 2024 and the figures relate to absolute numbers of staff.*

**Employee Turnover** = Total number of voluntary departures (non-seasonal) + out of the ordinary terminations / Total number of adjusted permanent staff (normal permanent + 12 month adjusted seasonal staff) = 29.4%

*Employees who were seasonal were grossed up to 12-month equivalents (i.e. permanent staff)*

*Seasonal employees who were terminated at the end of the season were NOT considered as terminated (hence the grossing up to permanent staff)*

*Terminations for the purpose of staff turnover therefore were only considered to be voluntary departures and out of the ordinary terminations.*

## S1-7

### *Non-employees in own workforce*

There are no non-employees in the Company's workforce.

## S1-8

### *Collective Bargaining & Worker's Representation*

#### *Collective Bargaining Agreements by Region*

| <b>Collective bargaining coverage and social dialogue</b> |                                       |                            |                                            |
|-----------------------------------------------------------|---------------------------------------|----------------------------|--------------------------------------------|
|                                                           | <b>Collective Bargaining Coverage</b> |                            | <b>Social dialogue</b>                     |
| <b>Coverage Rate</b>                                      | <b>Employees – EEA</b>                | <b>Employees – Non-EEA</b> | <b>Workplace representation (EEA only)</b> |

|           |                |     |                |
|-----------|----------------|-----|----------------|
| 0 -19 %   |                | N/A |                |
| 20 -39 %  |                | N/A |                |
| 40 -59 %  |                | N/A |                |
| 60 -79 %  |                | N/A |                |
| 80 -100 % | Cyprus, Greece | N/A | Cyprus, Greece |

Collective bargaining agreements of employees in both regions of operations, ensure that employment terms, conditions and rights are negotiated and upheld through formal agreements. Employees who are not covered by these agreements adhere to voluntarily established terms aligned with industry standards to ensure fair working conditions. Louis PLC does not have agreements with a European Works Council or Societas Europaea Works Council.

## S1-13

### *Training & Skills Development*

|                                                           | <b>Cyprus</b> |               |              | <b>Greece</b> |               |              |
|-----------------------------------------------------------|---------------|---------------|--------------|---------------|---------------|--------------|
|                                                           | <b>Male</b>   | <b>Female</b> | <b>Total</b> | <b>Male</b>   | <b>Female</b> | <b>Total</b> |
| Training hours                                            | 11,515        | 5,691         | 17,206       | 278           | 250           | 528          |
| Number of employees in workforce                          | 865           | 763           | 1,628        | 246           | 204           | 450          |
| Average training hours based on total employee head count | 13.31         | 7.46          | 10.57        | 1.13          | 1.23          | 1.17         |

*Please Note: the above relate to the total training hours irrespective of topic*

*Measurement Uncertainty: Information from Greece trainings is limited with training records from four out of five units.*

Currently no performance and career development reviews are being carried out.

## S1-14

### *Health and Safety*

|                                                                                                  |      |
|--------------------------------------------------------------------------------------------------|------|
| Percentage of employees covered by Health and Safety Management System (ISO 45001:2018 or other) | 100% |
| No. of Work-Related Fatalities (Employees)*                                                      | 0    |
| No. of Work-Related Fatalities (Other workers)*                                                  | 0    |
| No. of Work-Related Accidents (Cyprus & Greece)**                                                | 18   |

|                                                       |      |
|-------------------------------------------------------|------|
| Recordable Accident Rate (Cyprus & Greece)            | 4.08 |
| No. of recordable Work-Related Ill Health             | 0    |
| No. of Lost Workdays Due to Work-Related Incidents*** | 375  |

*No fatalities registered as a result of work-related injuries and work-related ill health across Louis PLC, as well other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites.*

*\*Number of Fatalities - The number of fatalities registered across Louis PLC and other workers resulting from work-related injuries or work-related ill health.*

*\*\*Number of work-related accidents - The number of work-related accidents represents the total consolidated incidents recorded within the reporting period for employees, as documented in local health and safety management systems. These incidents are tracked to assess occupational risks and improve preventive measures.*

*Recordable accident rate for Cyprus and Greece (offices, restaurants, hotels) = (18 cases /4,411,387 hours) x 1,000,000 = 4.08*

*\*\*\*Number of days lost - It includes all calendar days from the first full day of absence due to work-related injuries or illnesses.*

## S1-17

### *Incidents, complaints and severe human rights impacts*

A few discrimination complaints have been filed through the available channels for employees to raise specific concerns, with all complaints being handled by the Hotel General Managers or HR Department. No fines, penalties and compensation for damages has been required as no incidents of severe human rights issues and incidents have been reported.

## Affected Communities

---

### S3.SBM-3

Louis PLC recognizes that its operations directly impact the local communities surrounding its hotels and business activities as well as the wider regions/countries within which it operates in both Cyprus and Greece, as an integral part of its upstream and downstream value chain.

Louis PLC is committed to fostering economic development and cultural preservation in the communities where it operates. With 100% of its supplies sourced locally, the company actively supports regional economies while reducing the environmental impact of transportation. By prioritizing local employment, Louis PLC enhances economic stability and creates opportunities for local residents.

Beyond economic contributions, the company integrates cultural heritage into its services, offering initiatives such as the Cypriot and Greek Breakfast, a recognized label by the Deputy Ministry of Tourism in Cyprus and organizing traditional cooking and dance performances for guests. These efforts promote local traditions and enrich visitor experiences while strengthening community ties.

Louis PLC also provides direct support to local institutions through sponsorships, donations, and partnerships. A key example was its contribution to *Polis Hospital* during the COVID-19 pandemic, helping secure essential medical equipment. Additionally, the company drives local business growth by encouraging visitor engagement with nearby restaurants, shops, and cultural sites.

No material negative impacts, risks and opportunities were identified with regards to affected communities, however, Louis PLC is an integral part of the communities within which it operates, therefore the relationship with the local communities is part of our business model, therefore the following positive impact was identified as material:

| Type                   | IRO                          | Description                                                                                                      | Position in the Value Chain | Time Horizon |
|------------------------|------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Actual Positive Impact | Supporting local communities | Through job creation within hotel operations as well as within the local communities benefiting through tourism, | O*                          | SM**         |

|  |  |                                                                                                                                                                                                            |  |  |
|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  |  | sponsorships<br>i.e. Polis<br>Hospital, in-<br>kind and<br>monetary<br>donations, and<br>by supporting<br>local suppliers<br>with the<br>majority of<br>procurement<br>coming from<br>Greece and<br>Cyprus |  |  |
|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

*\*O= Own Operations, U = Upstream, D = Downstream.*

*\*\*S = Short-term, M = Medium-term, L = Long-term.*

If issues arise, between the company and the local communities, the company will respond and adjust its strategy, with the aim of fostering a positive relationship with these communities.

### S3-1

#### *Policies*

Louis PLC is committed to fostering positive relationships with the communities surrounding its operations by implementing practices that support economic development, cultural preservation and environmental responsibility. The company does not currently have a policy for managing its material impact on the affected communities. Louis PLC aims to develop a human rights policy, which we are planning to finalize and implement in due course, while we continue to support local communities through prioritisation of business relationships with local suppliers and employees and monetary and in-kind donations reinforcing economic resilience while promoting local culture.

### S3-2

#### *Engagement with Affected Communities*

Louis PLC actively engages with affected communities to ensure their perspectives shape business decisions and that operations contribute positively to their well-being. The company fosters direct communication through structured engagement processes, allowing local stakeholders to voice concerns and collaborate on solutions.

Engagement occurs at multiple stages:

- Ongoing monitoring – Gathering community feedback through consultations and grievance mechanisms. Louis PLC ensures affected communities are involved in decision-making through community meetings, surveys, and structured consultations, particularly for initiatives related to employment, sustainability, and local business development. The company also maintains grievance mechanisms to allow communities to raise concerns confidentially and ensure timely resolutions.
- Remedy development – Working with affected stakeholders to resolve concerns and implement solutions.
- Post-impact evaluation – Reviewing the effectiveness of engagement and ensuring positive long-term outcomes.

The Chief Operations Officer (COO) is responsible for overseeing these engagement efforts, ensuring that community input is integrated into corporate decision-making. To assess the effectiveness of these engagements, Louis PLC conducts regular evaluations, feedback loops and audits, ensuring that community concerns are addressed effectively and transparently.

### S3-4

#### *Managing impacts on affected communities*

To achieve positive impact on affected communities, Louis PLC leverages its business relationships to address potential concerns and maximize positive outcomes. This includes collaborating with industry partners, NGOs and local stakeholders to enhance community resilience and economic stability. The company also engages in policy advocacy and government collaboration to support responsible business practices, environmental protections, and fair labour policies.

A notable example of Louis PLC's community involvement is the Royal Apollonia Limassol which partnered with the Cyprus Anti-Cancer Association in December 2024 to host a Christmas fundraising Bazaar. This two-day event brought the community together to celebrate the festive season while raising funds to provide free palliative care services for cancer patients.

Initiatives like the above reflect Louis PLC's collaborative approach to strengthening community ties. By promoting sustainable tourism, the company reinforces its commitment to making a lasting positive impact on the communities where it operates.

In addition to this, the company actively participates in industry initiatives focused on reducing environmental impact and supporting local supply chains with 100% procurement from Greece and Cyprus.

While no severe human rights issues have been identified, Louis PLC remains vigilant in preventing potential adverse effects. The Operations, Health & Safety, Procurement, Internal Audit, and Finance departments play a key role in managing community impacts and driving positive social contributions.

While we have been successful in supporting local suppliers (100% of our procurement budget is channelled to local suppliers), and we have organised in-kind and monetary donations to the communities in which we operate, at the moment, tracking effectiveness of these actions is not possible.

### S3-5

#### *Targets*

Louis PLC has not established formal targets related to affected communities, as no material negative impacts, risks or opportunities have been identified. Additionally, no significant complaints have been reported by the local communities and the company remains focused on continuously enhancing positive contributions through employment, local procurement and community engagement initiatives.

Moving forward, the company will continue to assess potential impacts, risks and opportunities, through assessing relations with suppliers and communities, so that its approach remains aligned with sustainable development and the needs of affected communities. Any future targets will be guided by stakeholder feedback, impact assessments and industry best practices.



## Consumers and End-Users

### S4.SBM-3

Louis PLC is committed to understanding and managing the material impacts of its operations on consumers and end-users. The company primarily serves individual hotel and restaurant guests, as well as corporate clients visiting for leisure or business purposes, with a diverse customer base and the majority of clientele coming from the UK, the EU and Israel for both Greek and Cypriot establishments. With consumers and end-users linked to the core of our business, their feedback directly influences our business strategy.

The hospitality services provided by Louis PLC contribute to guests' overall well-being, offering high-quality accommodation, dining and recreational experiences that promote relaxation, cultural engagement and social interaction. The company acknowledges material potential impacts and risks that could arise through this stakeholder group:

| Type                       | IRO                               | Description                                                                                                                                  | Position in the Value Chain | Time Horizon |
|----------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|
| Potential Negative Impacts | Cyber security / Cyber-attacks    | Loss of information risking the cyber-safety of customers, can lead to potential legal action with financial and reputational consequences   | UDO*                        | SM**         |
|                            | GDPR                              | Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences. | UDO*                        | SM**         |
| Risks                      | Guest Safety in case of accidents | Physical harm or medical emergencies                                                                                                         | O*                          | S**          |

|  |  |                                                                                   |  |  |
|--|--|-----------------------------------------------------------------------------------|--|--|
|  |  | due to accidents including slip and fall, poor equipment and facility maintenance |  |  |
|--|--|-----------------------------------------------------------------------------------|--|--|

*\*O= Own Operations, U = Upstream, D = Downstream.*

*\*\*S = Short-term, M = Medium-term, L = Long-term.*

As a central stakeholder group, in all regions of operations, all guests are considered primary end-users of the services provided by the company and were considered during the identification and assessment of the material impacts, risks and opportunities. Given this, safeguarding guest safety, privacy, and satisfaction remains a strategic priority. While all guests are exposed to the potential negative impact and the risks can arise from any guest data breach no specific consumer groups have been identified as facing heightened vulnerability. The company remains committed to proactively managing negative impacts through responsible business practices.

## S4-1

### *Policies*

Louis PLC is committed to providing a safe, inclusive and high-quality experience for all consumers and end-users. To achieve this, the company has implemented policies focusing on data privacy and guest safety, ensuring responsible business practices and full regulatory compliance.

*[For further details on Policies please refer to S1-1 of this document]*

## S4-2

### *Engaging with our consumers and end-users*

At Louis PLC, actively seeks guests' input at multiple touchpoints, including pre-arrival, during their stay and post-departure, using structured engagement methods such as guest satisfaction surveys, direct feedback to hotel management, sustainability-focused questionnaires and online complaint forms. Recognizing the importance of accessibility and inclusivity, anonymous reporting options are also available, allowing vulnerable or marginalized guests to express concerns without fear of retaliation. These interactions help shape business decisions, align offerings with guest expectations and enhance overall consumer experience.

The Chief Operating Officer (COO) holds overall responsibility for guest engagement, with the Quality Manager ensuring that service quality standards are maintained and improved based on consumer insights. Engagement effectiveness is measured through

responsiveness levels through the above channels as well as through guest satisfaction scores. This ensures that concerns are addressed efficiently, while service improvements are data-driven.

### S4-3

#### *Processes to remediate impacts and channels to raise concerns*

Further to S4-2 Disclosures, the company prioritizes open and transparent communication through the previously mentioned channels, that allow guests to raise concerns and receive timely resolutions where possible.

All grievances are treated with strict confidentiality, in alignment with privacy regulations, including GDPR compliance. The company also enforces a whistleblower protection policy and a Business Code of Conduct and Ethics, allowing guests to report issues anonymously without fear of retaliation.

The Quality Manager oversees grievance-handling processes, ensuring a structured approach to issue resolution. The effectiveness of grievance channels is monitored through guest engagement metrics, including guest feedback scores, resolution rates, and complaint turnaround times. By continuously refining these mechanisms, Louis PLC strengthens consumer trust, demonstrating a commitment to transparency, accountability, and service excellence.

### S4-4

#### *Actions on impacts on consumers and end-users and managing risks*

Louis PLC recognizes the importance of proactively managing negative impacts and risks. Further to the aforementioned policies, the company manages the impact on guests, through extensive training of staff on H&S procedures. Equipment and facilities undergo regular maintenance in accordance with regulation and manufacturer instructions to avoid any guest accidents and injuries. Additionally, H&S procedures in place to prevent accidents include evacuation procedures, adherence to fire safety regulations, signage, clear hazard indications i.e., for slip and fall, fire extinguishers, while a number of our establishments are certified with ISO22000 - Food Safety Management and ISO9001- Quality Management Systems. Under ISO22000, guests are informed of all relevant food allergens and as a minimum requirement under national and EU law, all food & beverage facilities have HACCP certifications. A Legionella management plan is also in place for all water sources, including pools, taps, SPA services, air-conditioning units, decorative water features etc.

*[For further H&S actions please refer to S1-4 of this document]*

To mitigate risks related to GDPR and cyber-security the company ensures that staff is adequately trained in data handling and adhere to the Data Retention Policy. Insurance coverage for data breaches and information security systems are in place to ensure both the likelihood as well as the magnitude of risk are minimized. We also continue to

use the specialised software [ENACTIA](#), an AI driven comprehensive cloud suite for privacy management, assisting Louis Hotels to fully comply with GDPR.

*[For further Cybersecurity and GDPR actions please refer to S1-4 of this document]*

Louis PLC is constantly seeking to improve on existing measures and put in place further measures that will ensure the physical as well as data safety of guests, taking advantage of emerging technologies to address client expectations to the extent possible.

Louis PLC conducts guest satisfaction surveys across all its properties. These surveys help measure and enhance quality performance in alignment with guest expectations.

Louis PLC actively monitors key performance indicators, including:

- Guest satisfaction ratings
- Incident reports related to cybersecurity and data breaches, emergency responses, human rights issues and health and safety
- Effectiveness of grievance mechanisms and resolution timelines

## S4-5

### *Targets*

Although outcome-oriented targets have not been put in place related to the management of material impacts and risks, the aim is strict adherence to the company policies and the avoidance of any incidents related to guest accidents or data breaches, through existing and improved procedures, following real-time guest feedback and internal performance tracking.

Guest feedback is continuously integrated into service enhancements, ensuring that consumer perspectives shape key decision-making and play a vital role in tracking performance and identifying improvement areas.

# Governance

## Business Conduct

### G1.GOV-1

The Board of Directors plays a key role in setting the strategic direction of Louis PLC, ensuring that our business practices reflect the company’s values and sustainability goals. The Board approves and regularly reviews the Code of Conduct, manages risks related to unethical practices such as corruption and human rights violations and integrates ethical principles into every aspect of our operations—from responsible sourcing to employee well-being.

Executive Management, led by the CEO, bring these principles to life in our daily operations. They ensure employees receive anti-corruption training, regulations are followed and any violations are promptly addressed. Their focus goes beyond internal operations to maintaining high ethical standards across our value chain, reinforcing our commitment to responsible business practices at all levels.

The Audit and Risk Committees provide independent oversight of internal controls, business risk assessments, and external audits. By ensuring transparency in financial and sustainability reporting, they help safeguard the integrity of the company’s governance structure.

The Sustainability Committee ensures that our business conduct aligns with environmental and social commitments. It oversees key sustainability initiatives, and promotes transparency in non-financial disclosures, holding the company accountable to the broader responsibilities it has to society and the environment.

To stay aligned with evolving standards, Louis PLC ensures that its administrative, management, and supervisory bodies receive regular training on business conduct matters. In 2024, the Sustainability teams participated in CSRD and ESRS training, building on their capacities and staying current with new requirements.

### G1-IRO-1

#### *Impacts, Risks and Opportunities*

During the process of identifying and assessing impacts, risks and opportunities, in relation to business conduct matters, we considered all operations, in all regions, the company’s responsibilities to society, especially as a listed company. As such, the following inherent risks were identified as material:

| Type | IRO | Description | Position in the Value Chain | Time Horizon |
|------|-----|-------------|-----------------------------|--------------|
|      |     |             |                             |              |

|      |                                     |                                                                                                                                          |    |     |
|------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| Risk | Lack of strong corporate governance | Governance can allow a company to be vulnerable and exposed to a variety of issues, leading to legal repercussions and reputational risk | O* | M** |
|      | Corruption                          | Lack of procedures and policies in place could lead to corruption and bribery challenges                                                 | O* | M** |

\*O= Own Operations, U = Upstream, D = Downstream.

\*\*S = Short-term, M = Medium-term, L = Long-term.

## G1-1

### *Business conduct policies and corporate culture*

#### **Our Code of Conduct**

At Louis PLC, maintaining high standards of business conduct is central to our sustainability. Our policies are designed to ensure transparency, integrity, and ethical practices across all levels of the organization while adhering to legal and regulatory standards. On 6 March 2003, the Board of Directors of Louis PLC decided to implement all provisions of the Corporate Governance Code issued by the Cyprus Stock Exchange (CSE). This Code serves as the foundation for our governance framework, guiding our business operations and reinforcing our commitment to ethical business practices and sustainability. Our own Code of Business Conduct & Ethics has no material deviations from the CSE Code.

Complementing this, is our own Code of Business Conduct & Ethics, which outlines clear commitments in key areas such as workplace equality, diversity, data protection and zero tolerance for harassment. It also covers matters such as anti-bribery and anticorruption. Incidents of anti-corruption and anti-bribery are investigated once reported through whistle-blower channels.

## Our Corporate Culture

Our corporate culture is grounded in integrity, responsibility and a commitment to continuous improvement. Senior leadership sets the tone by modelling ethical behaviour and driving sustainability initiatives, ensuring these values are reflected in every aspect of our operations.

Regular employee engagement and training programs help raise awareness of ethical practices, promote diversity and encourage environmental stewardship. Transparent communication and open feedback channels create a collaborative environment where employees feel empowered to contribute to the company's evolving culture and shared success.

We continuously assess and promote our culture to ensure alignment with business goals and stakeholder expectations, through trainings and workshops, during onboarding of new employees and by sharing internal policies like the Code of Business Conduct and Ethics. Inclusive hiring practices, sustainability initiatives, and external partnerships strengthen our internal identity while reinforcing Louis PLC's broader social and environmental commitments.

## Reporting Concerns and Whistleblowing

Further to our own code of Business Conduct & Ethics, we have established a whistleblower policy and procedures to be followed. Whistleblower channels allow employees and stakeholders to report issues confidentially and without fear of retaliation. Investigations are handled promptly, ensuring fairness and transparency. If violations are identified, appropriate corrective actions are taken, including disciplinary measures and process improvements. Our whistleblower protections comply with all applicable legal requirements as per Directive (EU) 2019/1937 of the European Parliament and of the Council (121) and national legislation on GDPR, ensuring the safety and confidentiality of those who come forward.

We identify, report and investigate concerns that are raised through internal reporting channels through managers or the Human Resources department to the Chairperson of the Audit Committee, from both internal and external stakeholders.

The policy commitments of the Code of Business Conduct and Ethics and Whistleblower policy, apply uniformly to all of the company's activities and business relationships. Although there is no specific policy for training on business conduct, to ensure awareness and compliance, the Group provides relevant training for employees and communicates these commitments through internal channels, meetings, dedicated websites and contractual agreements.

## G1-3

### *Anti-bribery and anti-corruption*

At Louis PLC, addressing corruption and bribery is essential for maintaining our integrity and reputation. Our Code of Business Conduct and Ethics ensures transparency and accountability, outlining the responsibilities of employees, management, and board members in promoting ethical business practices.

### *Complaint Handling and Investigation Process*

All complaints are received by the Chairperson of the Audit Committee, who initiates a preliminary investigation. When necessary, the Head of Internal Audit conducts further investigations independently and confidentially, in line with General Data Protection Regulation (GDPR) requirements. If a report has merit, corrective actions—including disciplinary measures—are taken to address the issue and strengthen internal controls. Reports without substance are dismissed and the complainant is informed accordingly.

### *Data Management and Retention*

Data related to investigations is retained only as long as necessary and deleted within three months unless judicial or disciplinary proceedings are ongoing. This approach ensures compliance with GDPR while protecting the rights and confidentiality of all involved.

While Louis PLC does not have immediate plans for additional anti-corruption procedures, the company remains committed to its Code of Business Conduct and Ethics to prevent and address potential risks. Corrective actions are implemented as needed to enhance internal controls and maintain the highest standards of ethical conduct.

### *Anti-Corruption and Anti-Bribery Training*

Currently, a formal anti-corruption training program is not in place. However, Louis PLC plans to prioritize training for high-risk functions such as senior management and procurement to ensure awareness and preparedness across the organization. Regular communication and performance reviews help reinforce ethical behaviour and promote a culture of integrity, with management leading by example and setting the tone for the organization.

## G1-4

### *Corruption Incidents*

| Indicator                                       | 2024 |
|-------------------------------------------------|------|
| Confirmed incidents of corruption or bribery    | 0    |
| Convictions for anti-corruption or anti-bribery | 0    |



|                                                      |   |
|------------------------------------------------------|---|
| Fines for anti-corruption or anti-bribery violations | 0 |
|------------------------------------------------------|---|

Louis PLC's governance framework ensures continuous monitoring and reporting of incidents related to corruption and bribery. The company regularly reviews and strengthens its procedures to ensure they remain effective and aligned with industry best practices.

Currently, there are no additional plans for new procedures regarding corruption and bribery beyond the robust systems already in place. However, we remain attentive and committed to continuously improving our governance framework. By adhering to our Code of Business Conduct and maintaining strict oversight, Louis PLC aims to uphold its reputation for integrity and ensure that corruption and bribery risks are proactively managed.

## General Disclosures Index

### IRO 2

#### EU Legislation Data Points

The table below presents the data points derived from other EU legislation, as specified in ESRS 2 Appendix B. It provides references to where these data points are addressed within this report and indicates those data points that have been assessed as “*Not Material*” based on our materiality assessment, as well as those considered “*Not Applicable (N/A)*” to Louis PLC due to the nature of our activities and operations.

| Disclosure Requirement | Data Point |                                     | SFDR reference                      | Pillar 3 reference       | Benchmark Regulation reference      | EU Climate Law reference | Page/Materiality |
|------------------------|------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|------------------|
| ESRS 2 GOV-1           | 21 (d)     | Board's gender diversity paragraph  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 15               |
| ESRS 2 GOV-1           | 21 (e)     | Percentage of board members who are | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 15               |

|              |           |                                                                       |                                     |                                     |                                     |                          |     |
|--------------|-----------|-----------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|-----|
|              |           | independent paragraph                                                 |                                     |                                     |                                     |                          |     |
| ESRS 2 GOV-4 | 30        | Statement on due diligence paragraph                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | 19  |
| ESRS 2 SBM-1 | 40 (d) i  | Involvement in activities related to fossil fuel activities paragraph | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A |
| ESRS 2 SBM-1 | 40 (d) ii | Involvement in activities related to chemical production paragraph    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A |

|              |            |                                                                            |                                     |                                     |                                     |                                     |     |
|--------------|------------|----------------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-----|
| ESRS 2 SBM-1 | 40 (d) iii | Involvement in activities related to controversial weapons paragraph       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A |
| ESRS 2 SBM-1 | 40 (d) iv  | Involvement in activities related to cultivation and production of tobacco | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            | N/A |
| ESRS E1-1    | 14         | Transition plan to reach climate neutrality by 2050                        | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 39  |
| ESRS E1-1    | 16 (g)     | Undertakings excluded from Paris-aligned Benchmarks                        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 40  |

|           |          |                                                                                                    |                                     |                                     |                                     |                          |     |
|-----------|----------|----------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|-----|
| ESRS E1-4 | 34       | GHG emission reduction targets                                                                     | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 41  |
| ESRS E1-5 | 38       | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | 41  |
| ESRS E1-5 | 37       | Energy consumption and mix paragraph                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | 41  |
| ESRS E1-5 | 40 to 43 | Energy intensity associated with activities in high climate impact                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> | N/A |

|           |          |                                                                                 |                                     |                                     |                                     |                                     |     |
|-----------|----------|---------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-----|
|           |          | sectors paragraphs                                                              |                                     |                                     |                                     |                                     |     |
| ESRS E1-6 | 44       | Gross Scope 1, 2, 3 and Total GHG emissions                                     | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 43  |
| ESRS E1-6 | 53 to 55 | Gross GHG emissions intensity                                                   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 43  |
| ESRS E1-7 | 56       | GHG removals and carbon credits                                                 | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | N/A |
| ESRS E1-9 | 66       | Exposure of the benchmark portfolio to climate-related physical risks paragraph | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | N/A |
| ESRS E1-9 | 66 (a)   | Disaggregation of monetary                                                      | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | N/A |

|           |        |                                                                                        |                          |                                     |                                     |                          |     |
|-----------|--------|----------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|-----|
|           |        | amounts by acute and chronic physical risk paragraph)                                  |                          |                                     |                                     |                          |     |
| ESRS E1-9 | 66 (c) | Location of significant assets at material physical risk paragraph                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | N/A |
| ESRS E1-9 | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | N/A |
| ESRS E1-9 | 69     | Degree of exposure of the portfolio to                                                 | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A |

|           |    |                                                                                                                                                        |                                     |                          |                          |                          |              |
|-----------|----|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------|
|           |    | climate-related opportunities                                                                                                                          |                                     |                          |                          |                          |              |
| ESRS E2-4 | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS E3-1 | 9  | Water and marine resources                                                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 59           |
| ESRS E3-1 | 13 | Dedicated policy                                                                                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 59           |



|                    |          |                                                                             |                                     |                          |                          |                          |              |
|--------------------|----------|-----------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------|
| ESRS E3-1          | 14       | Sustainable oceans and seas                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A          |
| ESRS E3-4          | 28 (c)   | Total water recycled and reused                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS E3-4          | 29       | Total water consumption in m <sup>3</sup> per net revenue on own operations | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 60           |
| ESRS 2- SBM 3 - E4 | 16 (a) i | Biodiversity sensitive areas                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 61           |
| ESRS 2- SBM 3 - E4 | 16 (b)   | Land impacts                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS 2- SBM 3 - E4 | 16 (c)   | Threatened species                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 61           |
| ESRS E4-2          | 24 (b)   | Sustainable land / agriculture                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |

|                   |        |                                                 |                                     |                          |                          |                          |              |
|-------------------|--------|-------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------|
|                   |        | practices or policies                           |                                     |                          |                          |                          |              |
| ESRS E4-2         | 24 (c) | Sustainable oceans / seas practices or policies | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS E4-2         | 24 (d) | Policies to address deforestation               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS E5-5         | 37 (d) | Non-recycled waste                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 67           |
| ESRS E5-5         | 39     | Hazardous waste and radioactive waste           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 67           |
| ESRS 2- SBM3 - S1 | 14 (f) | Risk of incidents of forced labour              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |
| ESRS 2- SBM3 - S1 | 14 (g) | Risk of incidents of                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not Material |

|           |    |                                                                                                                   |                                     |                          |                                     |                          |              |
|-----------|----|-------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------|
|           |    | child labour paragraph                                                                                            |                                     |                          |                                     |                          |              |
| ESRS S1-1 | 20 | Human rights policy commitments                                                                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 75           |
| ESRS S1-1 | 21 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 75           |
| ESRS S1-1 | 22 | processes and measures for preventing trafficking in human beings                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not Material |
| ESRS S1-1 | 23 | workplace accident                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 72           |

|            |                |                                                                                    |                                     |                          |                                     |                          |              |
|------------|----------------|------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------|
|            |                | prevention<br>policy or<br>management<br>system                                    |                                     |                          |                                     |                          |              |
| ESRS S1-3  | 32 (c)         | Grievance/co<br>mplaints<br>handling<br>mechanisms                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not Material |
| ESRS S1-14 | 88 (b) and (c) | Number of<br>fatalities and<br>number and<br>rate of work-<br>related<br>accidents | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 82           |
| ESRS S1-14 | 88 (e)         | Number of<br>days lost to<br>injuries,<br>accidents,<br>fatalities or<br>illness   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 82           |

|                   |         |                                                                       |                                     |                          |                                     |                          |              |
|-------------------|---------|-----------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------|
| ESRS S1-16        | 97 (a)  | Unadjusted gender pay gap                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not material |
| ESRS S1-16        | 97 (b)  | Excessive CEO pay ratio                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not material |
| ESRS S1-17        | 103 (a) | Incidents of discrimination                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 83           |
| ESRS S1-17        | 104 (a) | non-respect of UNGPs on Business and Human Rights and OECD Guidelines | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 83           |
| ESRS 2- SBM3 – S2 | 11 (b)  | Significant risk of child labour or forced labour in the value chain  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not material |
| ESRS S2-1         | 17      | Human rights policy commitments                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not material |

|           |    |                                                                                                                   |                                     |                          |                                     |                          |              |
|-----------|----|-------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------|
| ESRS S2-1 | 18 | Policies related to value chain workers                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not material |
| ESRS S2-1 | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not material |
| ESRS S2-1 | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not material |

|           |    |                                                                                        |                                     |                          |                                     |                          |              |
|-----------|----|----------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|--------------|
| ESRS S2-4 | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Not material |
| ESRS S3-1 | 16 | Human rights policy commitments                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 85           |
| ESRS S3-1 | 17 | non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 85           |
| ESRS S3-4 | 36 | Human rights issues and incidents                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 86           |
| ESRS S4-1 | 16 | Policies related to                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 89           |

|           |        |                                                                                      |                                     |                          |                                     |                                     |    |
|-----------|--------|--------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|----|
|           |        | consumers<br>and end-users                                                           |                                     |                          |                                     |                                     |    |
| ESRS S4-1 | 17     | Non-respect<br>of UNGPs on<br>Business and<br>Human Rights<br>and OECD<br>guidelines | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 89 |
| ESRS S4-4 | 35     | Human rights<br>issues and<br>incidents                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | 90 |
| ESRS G1-1 | 10 (b) | United<br>Nations<br>Convention<br>against<br>Corruption                             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | 94 |
| ESRS G1-1 | 10 (d) | Protection of<br>whistle-<br>blowers                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | 94 |
| ESRS G1-4 | 24 (a) | Fines for<br>violation of<br>anti-                                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 96 |



|           |        |                                                             |                          |                          |                          |                          |    |
|-----------|--------|-------------------------------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|----|
|           |        | corruption<br>and anti-<br>bribery laws                     |                          |                          |                          |                          |    |
| ESRS G1-4 | 24 (b) | Standards of<br>anti-<br>corruption<br>and anti-<br>bribery | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 96 |