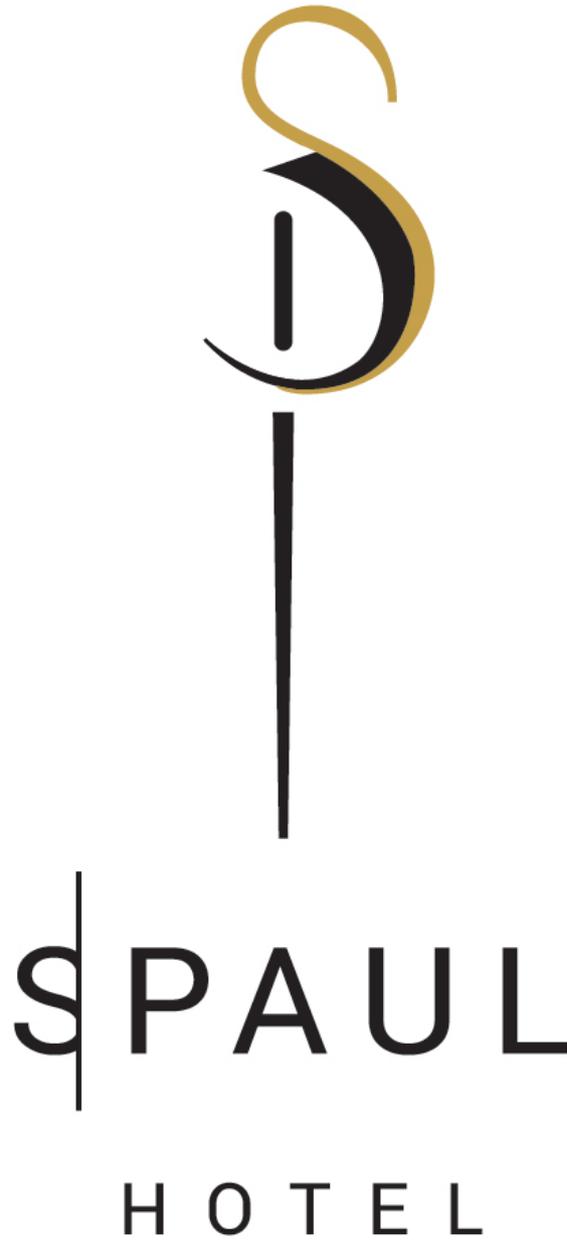


SUSTAINABILITY
MANAGEMENT
PLAN
2019



INTRODUCTION

S Paul Hotel is a listed two store stone building, situated in the historical city center of Limassol. The building dates back to the 18th century and was used as the Town Hall in the beginning of the 19th century.

The Hotel expands into two levels around a courtyard, formed by a series of stone arches. The central courtyard borders the public areas of the hotel, the lobby, the bar and the dining room. An olive tree acts as a centerpiece, gathering guests under its shadow, while the light penetrates the interior, blending materials. Access to the upper level and the 22 unique guest rooms is granted via an imposing solid marble staircase. The guest rooms' high end luxurious design arranged elegantly and with attention to detail, delivers to the visitor a custom-made experience. The rooms were divided according to the initial opening of the building so as not to disturb the original features. The arches and elaborated original patterns were used in the interior design interpreted in a contemporary way.

The solid cypress floors, existing local stone, marble and bronze details are harmonically combined and are presenting to the guests a warm hospitable area in the historical city of Limassol.

S Paul Hotel is located in the heart of the extraordinary center of Limassol in an extremely characteristic and lively area and within short walk distance to many places of interest. The hotel is the right choice for visitors who are searching for a combination of charm, class and a convenient location from which to discover Limassol. The two store stone structure boasts humbly with a beautifully designed atrium of stone built arches.

S Paul Hotel is approximately 80 meters away from Molos area and the seafront and is only in a 5 minutes walk from the old port and the Limassol Marina. The Limassol Castle is approximately 500 meters away, with Saripolou Square being only 2 minutes away on foot.

Purpose

S Paul Hotel is family owned and run with sole purpose to give their guests the best experience and making them feel like home. Personally curated from top to toe by owner Natali Martini, S Paul Hotel is like no other. The building was part of Natali's inheritance and her love of family and history led her to renovate it and create a home away from home for all her guests. Natali named the Hotel as a tribute to her great-grandfather, Sir Paul George Pavlides. Paul Pavlides was knighted by Queen Elizabeth II as Sir in 1955. Special mention is made in The London Gazette in 1955, which states that "*Whitehall, March 18, 1955: The QUEEN was pleased on Tuesday, the 15th instant, at Buckingham Palace, to confer the honor of Knighthood on Paul George Pavlides, Esq., C.B.E.. Her Majesty's approval of this Knighthood was signified on 1st January 1955*" (*The London Gazette, 18 March, 1955, pp. 1630*). The knighthood was conferred as a New Year Honours 1955 appointment and was one of Queen Elizabeth's II appointments to reward and highlight good works by citizens of those countries. They were announced on 1 January 1955 to celebrate the year passed and mark the beginning of 1955. Sir Paul Pavlides, a prominent member of the local society and a successful entrepreneur was given the honor of Knight Bachelor. Following such important history, it would be only natural to name the hotel to S Paul, preserving the spirit of a great man whose work and social contribution was very important for Cyprus.

Whether you are on a visit for business or pleasure you will find all the amenities you may require. We renovated the building with the most care and love, and we truly hope your experience will be unforgettable in the best of ways.

1. As we are a family business we treat all our guests as part of our family. We provide them a home away from home and the best relaxing and high quality experience they can have.
2. Except from our guests, we also treat our colleagues as family members, making their time at work enjoyable as well as educational.
3. Combining family, heritage and history we provide a unique and authentic experience to all our guests.

Our core values:

1. Family
2. Teamwork
3. Ethics
4. Innovation
5. Respect
6. Sustainability
7. Heritage and History

SUSTAINABLE DESIGN AND CONSTRUCTION MANAGEMENT

The building where a hotel is situated was built approximately in the 1820s. It used to be a ground floor structure only and was used as the stables and employee department of Lady Kryristalia's home, which is situated at the top of the street near the hotel. After some years the first floor was build and used as the first townhall of Limassol until 1918. Then it was used as a part of the bank, a gentlemen club, where the high society of Limassol would meet and discuss political issues, and a part of the Metropole Hotel which was opposite the street and operated by Sir Paul Pavlides. In 1960 Sir Paul Pavlides left Cyprus and in the following years the building suffered damage due to a catastrophic rain which ruined its roof, therefore closing down the building. The building was left empty for 35 years until 2015, when the family decided to renovate and build the S Paul Hotel.

All original structures of the edifice were preserved and new structures were built where needed with the utmost respect to the history of the building. Materials like stone and wood were used as main elements in the renovation. The renovation of the building was done with respect to the history such as the restoration of the main staircase that leads to the first floor. A large atrium can be found in the center of the building surrounded by stone arches which were restored and stand at the full glory.

Apart from the renovation concerned with the history of the building, the family took into account sustainability and environmental issues. The automation system KNX, designed by Zenion, was put in place in the hotel to monitor lighting, HVAC systems, metering, security system, energy management, monitoring systems and remote control. With the help of KNX it is possible to face sustainability matters, such as energy consumption and machine faults.

SUSTAINABILITY MANAGEMENT PLAN

Our Sustainability Management Plan aims to establish a framework for managing the hotel in a sustainable manner, with a special attention to the socio-economical, cultural and environmental matters. The scope covers all the departments and activities of S Paul Hotel, as well as its interactions with guests, suppliers, employees and the local community.

Sustainability Management Plan Implementation

Designing systems for reducing energy and water consumption in the hotel formed part of the reduced energy consumption vision, which was reflected in the actual building design documents. Energy and water consumption is tracked every fourth month. Lights are on timers and automatically turn on in the evening and turn off in the morning. All light bulbs within the building are LED, minimizing consumption of energy. As part of automation system, all rooms are equipped with sensors so that when the guest is not in the room lights automatically turn off. Air-conditioning in the room will automatically turn off after the client has left and is set up to keep room natural temperature at 24 degrees, therefore minimizing energy consumption. To minimize water consumption a special toilet flush is used consuming only between 4 and 6 liters by flush while ordinary flushing systems use around 13 to 15 liters. The hotel bar and kitchen use a sterilizing and glass shining washing machine which reduces water consumption by using a combination of less water and more steam.

Sustainable Consumption and Purchasing

The hotel bar and kitchen prefer to use all the locally available food items and consumables within the island or nearby Mediterranean region. During purchasing S Paul Hotel ensures that no products listed in the CITES, national and local legislation or any other international legislation of priority as threatened, extinct or endangered is consumed or purchased in the hotel. Whenever possible S Paul Hotel will use biodegradable and environmentally friendly products to support sustainable consumption pattern and environmental stability.

Legal Compliance

S Paul Hotel is in compliance with all relevant international or local legislation and regulations. It can provide for evidence the documented land, water and property rights.

Employee Training

All the employees receive an appropriate and standardized training to fulfill the hotel's quality and requirements. Employees are required to share with the guests the effort of the Hotel to be sustainable end environmentally friendly. All guests are informed of the actions implemented by the hotel to save energy, power and water.

Target: Environmental and sustainability workshops to be conducted for all associates on a regular basis.

Customer Satisfaction

Customer satisfaction is very important to S Paul Hotel. The Manager of S Paul Hotel as well as all personnel are happy to speak with the guests at any time and ask about their experience and get their feedback to be able to improve on any department. A guest book, which can be found on the reception desk, is available to the guests for them to write feedback on their stay at the Hotel.

A feedback form is given to all the guests during their stay and it is returned to reception with the guests' information or anonymously if the guest wishes to refrain from giving personal information.

Target: Creating a monthly list of improvements based on the feedback forms.

Communication Strategy

Information about the Hotel is not printed but uploaded on the rooms TV where the guests can access it anytime. General information is printed on paper, however to avoid waste and damage of the paper it is framed in a nice photo frame and placed on the room's desk. That way it doesn't need to be replaced due to wear and tear but also give a homey feeling to the room. Guests can find extra information if needed either through the Hotel website or by simply asking the hotel employees, that way retaining communication between guests and employees. In addition, customers are provided orally with information related to the interpretation of the natural and cultural surroundings in order to promote an appropriate behavior.

Target 1: to make our guests more active and following our sustainability vision, through discussions and information packs.

Health and Safety

At S Paul Hotel we care for people so they can be their best and we want to ensure a safe working environment. Therefore, health and safety trainings are provided to raise awareness on the importance of health and safety in each department.

To ensure compliance of the Food Safety Management System, new kitchen associates are trained on safety and procedures. All kitchen associates undergo a mandatory basic food hygiene course in food handling.

Respect to the cultural and natural surroundings and engagement

Being part of the Limassol city history S Paul Hotel is closely integrated to the local infrastructure with respect to the natural surroundings and heritage. It cares to provide accessibility to anyone with special needs. For this purpose, the hotel takes measures to provide access to persons with disabilities, such as installation of a special lift.

SOCIO AND ECONOMIC IMPACT

Local Employment and Local Entrepreneurs

30% of our associates are locals from nearby communities. S Paul Hotel supports local tours such as ASCOT tours, guides its customers to the local craftsmen and food producers.

Community Development and supporting local businesses

S Paul Hotel in an effort to reduce water consumption as well as supporting local community outsources its laundry. Since the S Paul Hotel's chef is inspired by fresh and local products, the Hotel only uses local suppliers supporting therefore the Community.

S Paul Hotel serves breakfast and brunch to residents and non-residents, meals prepared with care and use of fresh local products. By 2020 S Paul Hotel will be serving lunch and dinner, all prepared with fresh and local products and with respect to the Cypriot Cuisine.

Respect Local Population

Even though local musicians, artists and singers would be a good way to support local community due to the fact that the hotel has large open spaces the above are not used as entertainment in order to respect residents and neighbors by reducing noise pollution.

Human Resources Policy

The hiring procedures are clearly formulated and employment opportunities are offered regardless any discrimination. S Paul Hotel is concerned with the well-being of its employees and ensures protection of labor rights, appropriate working conditions, decent wages, as well as opportunities for development and professional growth. A policy against commercial, sexual and any other form of exploitation or harassment has been implemented.

Community friendliness

The Hotel aims to establish a friendly and mutually profitable partnership with the local community and does not adversely affect their benefits.

CULTURAL RESPECT

S Paul Hotel perceives itself as an integral part of Limassol city history and thus feels sensible to the protection of the local historical heritage. It uses the traditional culture elements in its design, decoration and cuisine.

ENVIRONMENTAL CONCERN

Water saving

S Paul Hotel takes steps to minimize the overall water consumption. The toilets are equipped with water saving flushes –approximately double less water is consumed than with ordinary flushes. Its policy established the rule of every second day changing of sheets compared to similar business level hotel changing sheets every day.

S Paul Hotel guests are requested to think about the environment when asking for change of linen and towels. The following message are presented within the rooms so that the guest can inform the Front Desk Team how they would like to proceed:

Linen: Sheets are customarily changed between guest stays. If you feel that your sheet need to be changed daily, please inform our Front Desk Team. Our Housekeeping team will be pleased to accommodate your request.

Towels: Every day millions of gallons of water are used to wash towels that have only been used once. You Make the Difference:

- * A towel handing up means "I will use again."
- * A towel on the floor means "Please exchange"

Additionally, there is an automatic watering of the plants.

Waste and pollution policy

Waste is separated into three bins according to kind: plastic, paper and other waste. The Hotel takes measures to limit any kind of pollution.

Energy saving

S Paul Hotel is very proud to inform you that we have taken great care in saving energy and being ecofriendly and sustainable. All our lights are fitted with LED light bulbs and are set to switch off automatically when you exit the room. Our air-condition system works in a similar way, switching off when you exit the room and preserving the room in a neutral and comfortable temperature, therefore saving energy.

Biodiversity conservation

The Hotel respects wildlife and animal welfare and does not provide any danger for them on its territory.

Risk Management

S Paul Hotel recognizes the importance of risk management system for ensuring the hotel's sustainability practices and achieving its business goals.

The present document sets out the risk management strategy of the Hotel. The risk factors include:

- *Safety and security*
- *Food safety*
- *Discrimination*
- *Climate change*
- *Disaster management*
- *Economical risks*

The risk management strategy of S Paul Hotel is based on four steps:

1. Risk identification
2. Risk assessment
3. Action plan
4. Continuous monitoring & review

The procedures established for this purpose are to be constantly benchmarked with the best international practices.

The Hotel's Board is responsible for assessment of the businesses internal control systems and of compliance of its financial affairs with applicable laws and regulations. The Board assigns and is further assisted by the Risk Committee for the formulation of risk strategy. The actions are implemented by the Hotel's Management and Staff. The Board reviews the effectiveness of the implementation of the risk management system at least annually.

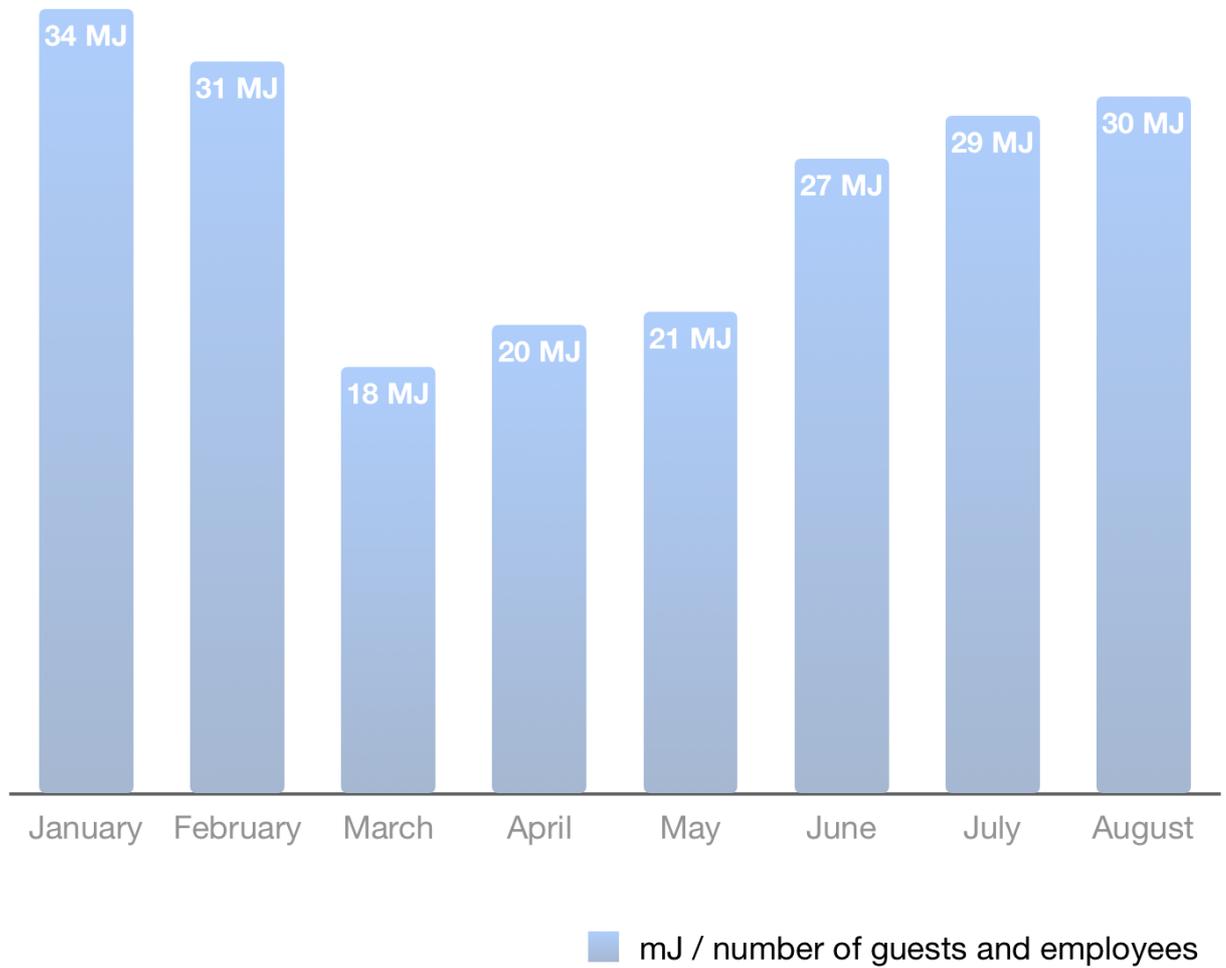
The list of risks and their grades are continuously monitored and updated annually by the Hotel Manager.

Identified risk	Risk analysis	Risk factor*	Actions to mitigate the risk	Risk status
Safety and security	The Hotel has a modern automated system and cameras in place; it provides staff with trainings on safety and security.	2	Establish effective insurance plan, conduct continuous monitoring and review activities.	Action taken
Food safety	The Hotel follows food safety rules and continuously monitors its suppliers while trying to prioritize local purchasing.	2	Establish effective supplier screening plan, follow sanitary requirements and review of stored products.	Action taken
Discrimination risk	The Hotel is open to employ staff of any nationality and gender including persons with disabilities based solely on their professional competencies.	1	To establish clear hiring and HR procedures ensuring fairness and transparency.	Action taken
Climate change	The region is incidentally affected by wildfires.	3	Engage with the local community and municipal authorities on wildfire prevention measures.	Action taken
Disaster management	Seashore prone to flood, seasonal heavy rains.	3	Develop guest alert plan, accept guests at any time of the day; provide weather guidance.	Action taken
Economic risks	Low tourist season in winter.	3	Develop economic activities with the local community, such as providing restaurant service, room renting for photography and filming purposes, etc.	Action taken

*score 1 – low, score 5 – high

Monitoring

Average daily energy consumption per guest

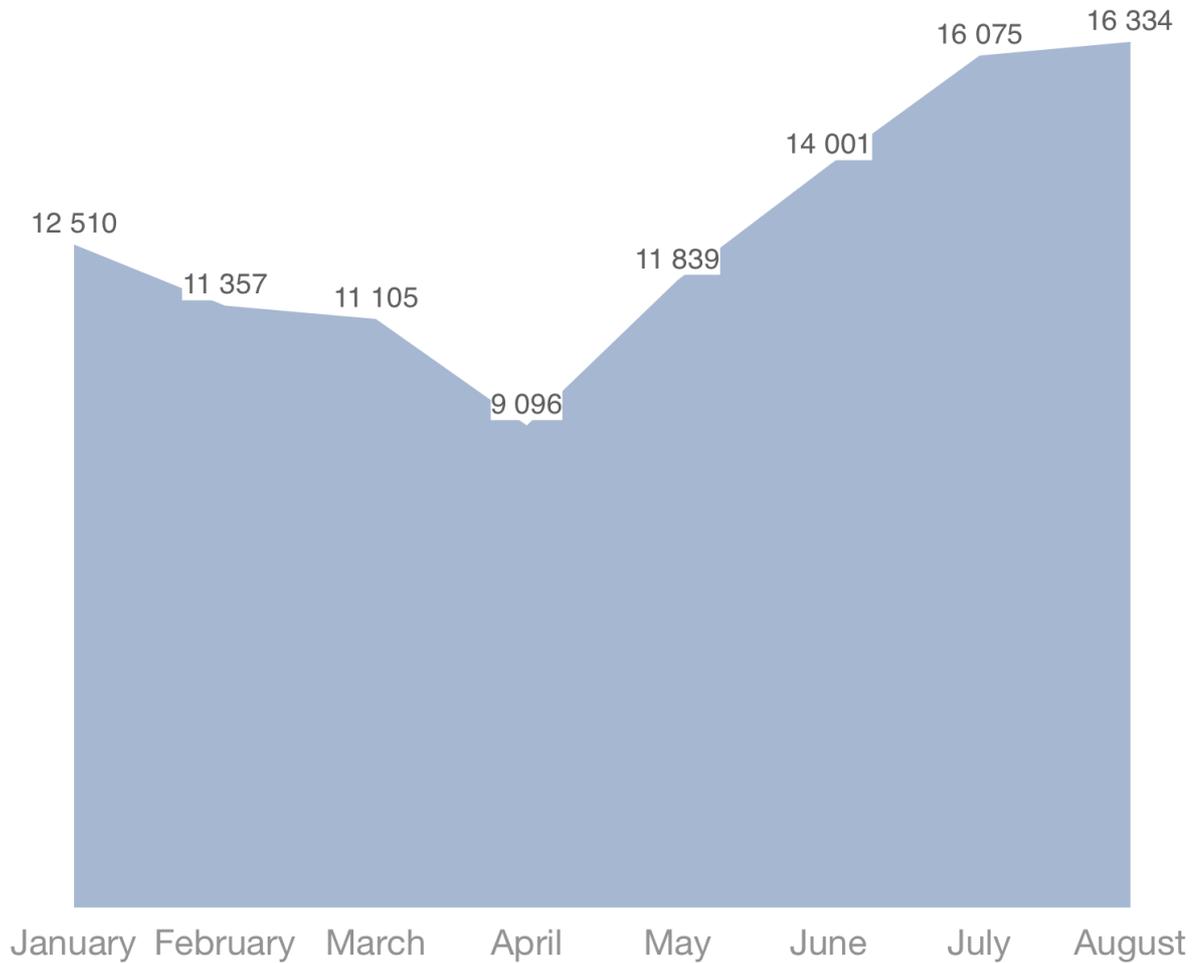


Average daily water consumption per guest January-May, 2019



■ Water in L /number of guests and employees

Total energy consumption in kWh per month, 2019



Criteria	January	February	March	April	May	June	July	August
Total Water (L)	1190							
Guests	2374							
Total Water per guest night average (L/guest night+staff)	0.50126369							
Total Energy (kWh)	12510	11357	11105	9096	11839	14001	16075	16334
Guests	373	363	609	454	575	516	555	548
Energy per guest night average (MJ/guest night+staff)	33.539	31.287	18.235	20.035	20.5896	27.134	28.964	29.807

Since S Paul Hotel started its operation since September 2018, the annual data on performance indicators has not yet been identified. The reporting is to be done on a quarterly basis. Monitoring is to be set one year after the operation when annual data will be received.