

SUSTAINABILITY MANAGEMENT PLAN





Contents

ABOUT VILLA DUBROVNIK	3
VISION	4
SCOPE	4
TARGETS	5
PURPOSE	6
ENVIRONMENTAL POLICY	6
FOUR KEY AREAS	8
SOCIO-CULTURAL	ε
FOR OUR EMPLOYEES:	8
FOR OUR COMMUNITY:	10
COMMUNITY ACTIVITIES FROM 2018 UNTIL 2025	12
ENVIRONMENTAL	
ENERGY:	13
WATER:	14
WASTE:	14
MINIMIZING CO2:	16
QUALITY	
FOR OUR GUESTS:	
FOR OUR EMPLOYEES:	17
OUR SUPPLIERS AND PRODUCTS:	17
HEALTH AND SAFETY	
IMPLEMENTATION	20
COMMUNICATION STRATEGIES	21
IMPROVEMENTS FOR THE FUTURE	22



ABOUT VILLA DUBROVNIK

Set below a road and secluded in maritime pines, the hotel is situated on the eastern edge of Dubrovnik on the Dalmatian Coast.

The property is just over a mile from the UNESCO protected medieval walls that surrounded the city's Old Town and it is a short walk to Sveti Jakov Beach, one of the most picturesque spots in the region.

Close by are the lookout point at Orsula Park, with spectacular views of the tiny bay, Lokrum Island, the city and beyond.

The origins of Villa Dubrovnik date to 1961 and the work of Croatian architect Mladen Frka, who devised a chic modernist residence on a rocky outcrop that was designed to become one with the landscape. In the 1980s, the site hosted its first hotel before undergoing an extensive renovation that was completed in 2010 by work of architect Boris Fiolić.

Efforts were made to preserve the structure's sharp linear style.

The gardens on the property and the stone beach at water's edge were left intact, while the interiors were revamped to evoke a contemporary mood.

The hotel's pristine white architecture provides a stunning contrast to the rocky landscape and emerald green waters of the Adriatic. The property's clean, nautical lines evoke an understated refinement and the modern decor that is matched by the rich traditions of the Mediterranean in a contemporary style.

Guests and visitors arrive from above, greeted by a discreet glass elevator that brings them down to reception. The decor stresses natural and nautical themes and features white wood, light colors and magnificent white stone.

Villa Dubrovnik is a small luxury boutique hotel which Sustainability Management plan is appropriate to the business size and scale:

- √ 700m2 of garden
- √ 6 suites
- √ 17 deluxe grand sea view residences, 15 deluxe sea view residences, 14 superior residences
- ✓ 2 rooms adjusted for people with disabilities
- ✓ 2 Villa residences with three bedrooms
- ✓ 2 restaurants and 2 bars
- ✓ Main indoor/outdoor pool



- ✓ Spa with saunas, steam room and bio sauna
- ✓ Fitness set up with the gym
- ✓ Beach area
- ✓ Meeting & Events room
- √ 3 public bathrooms

VISION

Villa Dubrovnik has a strong interest in protecting the environment and to act as local initiator of a healthy, livable, sustainable and vital environment in beautiful Dubrovnik surroundings.

One of our core values is to protect our environment and increase hotel's value and prosperity while decreasing our environmental footprint and make difference leading by example.

We also stand firm in following set of convictions in increasing economic responsibility, environmental responsibility, decent work responsibility and genuine community engagement.

SCOPE

The scope of the sustainability management plan covers all business, operational and hospitality activities at the Villa Dubrovnik in integration with all colleagues, customers, employees, business partners, owners, other stakeholders and the community.

It is our aim to improve our sustainability efforts, and to achieve one percent (1%) of overall annual improvement in connection with our future yearly review.

Protecting the environment is of our core value and we will extend our continuous efforts to raise awareness and encourage not only our employees, but also our guests, to be more conscious about environmental sustainability. In order to reduce the carbon footprint in hospitality industry, we have collaborated with Green Globe environmental organization to guide us to our goal.



Green Globe is the premier global certification for sustainable travel and tourism. The Green Globe Certification offers the world's most recognized and longest running program allowing us to be one of the green leaders in the travel and tourism industry to confidently promote our environmental credentials along with our commitment to the people and prosperity of Dubrovnik surroundings

TARGETS

1) General targets:

- Become a Green Globe Hotel.
- Incorporate new practices as a Green Globe Hotel to meet more Green Globe criteria.
- Become one of the most desirable companies to work for.
- To keep leading position in luxury hospitality business in Croatia.
- To keep and maintain our profit.

2) Satisfaction targets:

- Increase overall guest satisfaction in GRI review pro to 96%
- Increase employee satisfaction to over 90%
- Leading Quality Assurance and Fine Hotels and Resorts Score 1%above last score

3) Training targets:

- Train all departments twice a year in sustainability issues.
- Train all departments on Code of Ethics and Conduct.
- Train all departments according to all Health & Safety regulations.

4) Environmental targets:

- Reduce energy consumption by 1% in 2026.
- Reduce water consumption by 1% in 2026.
- Reduce waste levels by 2% in 2026.
- Reduce the overall carbon footprint by 1%.



PURPOSE

- ✓ The primary purpose of the Sustainability Management Plan is to guide decision making, management, and the daily operations of the business in a sustainable manner.
- ✓ To develop the business in a sustainable manner considering the environmental, socio-cultural, quality, and health & safety issues
- ✓ To demonstrate management commitment to comply with the environmental laws and regulations of the Croatia
- ✓ To develop a monitoring and audit program to ensure compliance to the Sustainability Management Plan and relevant environmental legislation and the early detection of any significant environmental impacts from the activities of the business
- ✓ To present mitigation strategies and actions for the control of pollution, waste minimization and resource conservation by effectively practicing Reduce, Reuse and Recycle wherever possible
- ✓ To establish a framework for environmental management
- ✓ Ensure the implementation of the identified mitigation measures and protect our environment and lower our carbon footprint.

ENVIRONMENTAL POLICY

Date: June 15, 2025

Villa Dubrovnik is a part of the community located on the Adriatic Sea that has a century-long history in environmental ideas. "Unity of men and nature" is one of the core concepts of Renaissance thought that is the main feature of our region, Dubrovnik city as UNESCO World Heritage Site, and its attractive force for our visitors and inhabitants.

As a prominent participant of such beautiful cultural and ecological landscape in which we live and work, we at Villa Dubrovnik are obliged in contributing to the well-being of our present and future generations by all our means and efforts. Hereby, we pledge to safeguard the environment in our everyday work, by establishing our business on following key principles of environmental sustainability:



- ➤ Compliance with all national and international environmental legislation
- Minimize consumption of water, energy, paper and other resources with constant evaluation.
- Minimize the amount of total generated waste and increase waste diversion ratio by controlling the waste management process and consumer returns.
- Maximize the use of recyclable and reusable materials, adopt and promote usage of renewable substances.
- Prioritize usage of eco-friendly chemical products that are not harmful to our environment.
- ➤ Offer guidance to our guests of products, services, and behaviors that are environmentally friendly and desirable in the local community.
- ➤ Initiate exemplary environmental activities within local community.
- Promote environmental awareness among our business associates, stakeholders, and suppliers by proactive communication and insisting on our ethical and sustainable operating policies.
- Create a culture of advanced environmental awareness within hotel by inhouse training programs and education.
- Monitor the progress of all our environmental performances in comparison to our set goals.

Villa Dubrovnik agrees to commit to the above-mentioned environmental principles and continual improvement.

Mirna Lončar Stražičić, CEO

Ivan Potkrajčić, CFO



FOUR KEY AREAS

SOCIO-CULTURAL

FOR OUR EMPLOYEES:

In the respect for all women and men, humans in all diversity, Villa Dubrovnik brings people, companies and products together and is committed to bind her guests, staff and suppliers in sustainable way.

This means that Villa Dubrovnik complies with laws and regulations, equality and human rights, including health, safety, labor, environmental aspects, and insurance policies.

Salaries and benefits meet national regulations, and all payments required by law such as pension & health insurance, holiday pay and overtime hours. Overtime is paid by hours worked beyond the established work in accordance with Croatian labor law. Week hours and working hours do not exceed the legal maximum established by the labor law, but being a hospitality industry at times a need might arise to work additional hours, colleagues are accordingly remunerated as per the policies outlined. The employees are given career development plans and cross training exposure to preferred areas to motivate the morale of the employees.

Villa Dubrovnik strictly complies with the Croatian law and EU Regulation of Child labor. Villa Dubrovnik has prevention of Child exploitation or child protection or sexual trafficking policy, the hotel does not encourage any type of exploitation in regard to the labor, sexual abuse or harassment and child trafficking within the hotel premises as a part of the Sustainability Management Plan. Appropriate policies are in place against the employment of children, sexual harassment, and exploitation. Villa Dubrovnik has included child exploitation awareness as part of the internal training conveyed to all employees through customized training material.

Villa Dubrovnik is willing to liaise with all relevant organizations to support and protect children from sexual abuse and trafficking

Following the external rules, Villa Dubrovnik assures that its Code of Conduct, as the result of mutual employee's consensus, is followed.



Diversity for Villa Dubrovnik's people means excellence in wide variety of forms such as profession and profiles, cultures and origins, and in terms of experience and career path.

- The percentage of women and men employees of Villa Dubrovnik is in proportion (40%-60%).
- Ratio of women to men that hold executive positions is 50% to 50%, which is higher for women positions than average in EU, as per statistical reports of Eurostat 2019.
- As part of our policy of internal promotion and mobility, our employees benefit from training opportunities throughout their careers. Different tools are provided, enabling everyone to develop at their own pace following our inside trainings and coaching by the outside companies. Employee hiring, training, annual appraisal and performance review, at Villa Dubrovnik are in line with the HR competencies and competency models. Competencies and competency models are designed to define the skills, knowledge and attributes that make organization and individual successful. Once competencies are identified, people with these competencies can be recruited and show potential, being promoted. This builds an organization of successful colleagues who can deliver excellent business results and innovations.
- Above mentioned training program resulted in 16 promotions of our employees since 2023 to 2025.
- We provide equal opportunities for foreigners and locals. At the moment 27% of employees are foreigners of different nationalities (Philippines, Bosnia and Herzegovina and Serbia).
- We provide food, housing and commute tickets for all non-local and foreign employees to assure a smooth integration into society and basic needs.
- In order to constantly improve our responsibility policy, employees are encouraged to provide input over their improvement ideas.
- The use of public transport is encouraged.
- For year 2026 we have in plan developing our Award Program for Employees that will include prizes and points collecting for all individual and privately undertaken green, humanitarian and local volunteering actions and participation by our employees.



FOR OUR COMMUNITY:

We actively work together with the communities around Villa Dubrovnik in order to contribute to their sustainable development. We educate and encourage our employees to actively engage in the local society. In addition, we encourage our guests to support local products and services. Furthermore, we recognize that our natural heritage is also an important part of our community heritage, and the preservation of our natural environment is part of our sustainable policy.

- Our mission, as proprietors of tourism, is to firstly promulgate Croatia and its cultural and national heritage, Dubrovnik City as our precious habitat and lastly Hotel Villa Dubrovnik and its unique features.
- In accordance with this our guests are provided with information on the surroundings' history, culture and natural environment.
- Our guests are offered green solution options and information while exploring
 the area. Various expedition packages are available with local tour organizers
 to visit places of historical interest, museums, heritage villages, etc. or to
 embrace a more closely local green market and as such it is beneficial to the
 company and the local community.
- We maintain and preserve the area we are occupying by monetarily supporting conservation of our cultural heritage through Ministry of Culture of Republic of Croatia and Directorate for the Protection of Cultural Heritage.
- We support diverse humanitarian actions (Humanitarian Action for buying a wheelchair for a local person 2015, Donation for a Red Cross Organization 2014, Humanitarian Action for Parents Club of Prematurely Born Children "Palčić gore" 2014, Matrasses, pillows, blankets and clothes donation for Caritas 2018-2023.)
- We are a sponsor of unique Dubrovnik's Children Tennis Club Ragusa and assisted in organizing a participation at tennis tournament for underprivileged children" Dubrovnik Dub Bowl" 2018
- We organized and hosted several community events, such as the Clean-up Beach Day on March 30th 2023 where employees and locals came together to clean our beaches and underwater areas. This was in co-operation with Dubrovnik Ragusa Diving Club. This is community event which was held in 2024 and 2025 and it is something we do each year.
- We participated in "EKO DUBROVNIK 2023" event, held on Saturday, May 20, 2023, starting at 10 AM, with participants from domestic and international volunteer divers (over 100 divers). The chosen location was Uvala Lapad -



Sunset Beach. The organizers of this beach and underwater cleaning were diving centers from Dubrovnik with support of Dubrovnik-Neretva County, City of Dubrovnik, Dubrovnik Port Authority, Dubrovnik Tourist Board and County Tourist Board. After the dive, there was a presentation and tasting of authentic local products (food and drinks) from the participants' regions. Accommodation for divers coming from outside the Dubrovnik-Neretva County was provided in Dubrovnik hotels from Friday, May 19, to Sunday, May 21, 2023.

- We are delighted to share that in hotel refurbishment started in October 2023, we have contributed 90 white chairs from our conference room to Elementary School Lapad as part of our ongoing community support initiatives.
- For our VVIP guests' gifts, we have collaborated with local artist Romana
 Milutin Fabris to provide organic cotton handmade T-shirts, and we also
 sponsored her exhibition in Dubrovnik. Since reopening, Juraj Zigman famous
 Croatian designer made new bespoke T-shirts for VIP gifts and luxury
 amenities. Moreover, local artist Josip Ivanovic crafted St. Blasius statues as a
 gift for them.
- All hotel restaurant Gardino dishware is unique, handcrafted, and a small family business is supported to produce all for our bespoke restaurant needs
- A small Croatian family business is supported by creating natural, bespoke cosmetics for our hotel brand. These measures will continue to form an integral part of our sustainability strategy moving forward to promote Croatia
- All artwork in our entire hotel is from local Dubrovnik and Croatian artists to support our vision of promoting and supporting our famous tradition and community
- We participated for another year in a row in the Caritas project "In the Arms of Libertas," supporting children from Ukraine during the summer. Additionally, we prepared Christmas gifts for the children at "Dom Maslina," a local orphanage, ensuring they felt the joy of the holiday season. This is a long tradition that we will continue to do traditionally every year.
- As we went in complete refurbishments of the interior of the hotel, we are pleased to announce that during our hotel renovation, we extended our support to the Dubrovnik Nursing Home by donating essential items. These contributions included 10 tables, 40 chairs, 50 blankets, 100 medium-sized and 100 large towels, along with tablecloths and 20 fixed telephone devices. This initiative reflects our commitment to community welfare and underscores our dedication to making a positive impact beyond our business operations.

Revised: June 15, 2025



COMMUNITY ACTIVITIES FROM 2018 UNTIL 2025



Filed Visit, Kindergarten "Palčić, Villa Dubrovnik's Open Doors 11.05.2018.



Marking Forrest Day, giving-away air- purifying plants, 70 plants housed, 21.03.2019



Beach Clean-Up Day at Gjivovica Beach, Every year



Sponsorship of Children's Tennis Tournament, Du Bowl



Evacuation & Fire Drill, 27.03.2019.



Donation of 10 matrasses to Caritas Organization, 17.04.2019.



Environmental underwater cleanup action in the coastal area with the help of the diving club and our employees in 2022 and 2023



Participation with Dubrovnik Caritas in the "In the Arms of Libertas" project to support children from Ukraine in 2022.



Visit and giving Christmas gifts to the children of the orphanage "Dom Maslina" in the Dubrovnik-Neretva County in 2022 and 2023.





Underwater cleanup in front of the hotel in 2023.



Beach Clean up day on June 27th



Lapad Run 2025, support for breast cancer awereness

ENVIRONMENTAL

Villa Dubrovnik takes its responsibilities regarding the environment seriously. In recent years, the hotel has already taken small and larger steps to reduce its environmental impact.

ENERGY:

- Villa Dubrovnik has integrated Smart Rooms System- Intelligent Room Management that comprises Energy Savings, Safety and Electronic (paperless) Communication. It provides energy saving as the system automatically turns off lights and AC system if room is not used.
- All back-office computers and electronic equipment are shut down when workday is over.
- Meeting room's lights and equipment are shut down when not in use.
- Window drapes are closed to prevent room heating during summer season.
- Light saving standard operating procedure is set in place
- Villa Dubrovnik is using Electricity Supplier that has a focus on renewable resources of energy and in 2023 we received certificate that 742MWh of electricity has been provided from those resources.
- Automatic and efficient temperature settings for various areas of the hotel.
- Implementation of changing linen and towels only on guest's request.



WATER:

- In all rooms we have implemented Linen and Towel Re-use program.
 Informative cards are placed in guest rooms with specific suggestions for individual linen and towels reuse. Calculation is that more than one ton (1 T) of linen are washed less on monthly basis than in previous years.
- Only full loads are washed, and cold water is used where possible
- To achieve substantial water savings, we carry out monthly monitoring of our consumption
- Our sustainable garden is watered by eco-saving drip irrigation system, and we have replaced grass in Giardino area that demanded huge daily watering.
- Since 2010 restoration, Villa Dubrovnik has a Green Roof Top that is planted with Mediterranean native and local plants. We continued with this practice after the renovation in 2024 as well.
- We have switched to decorating public areas of the hotel with native flowers Bougainvillea, all flower arrangements are prepared by a small local company.
- All our cleaning products are green and eco-friendly from recognized supplier that holds European Eco-Label standard for biodegradable cleaning and dishwashing products.
- Every year outsourcing company is hired to cleanup entire sea bottom area of Villa Dubrovnik.
- Active system in place to detect and repair leaking toilets, faucets and showerheads in guest rooms and back-of-the house and is run in coordination with housekeeping department and engineering department through recording and reporting by Flex-keeping System.

WASTE:

- Waste management and waste minimization is practiced through the following waste hierarchy approach: REDUCE-REUSE-RECYCLE
- REDUCE by using and purchasing less product that are not biodegradable and through segregation system, we do not use plastic water bottles in hotel.
- REUSE before item is wasted away always is considered If it can serve for other purposes.
- RECYCLE collecting and processing materials that would otherwise be thrown away as trash and turning them into new products.
- Special Deputy for Waste is appointed that on regular basis controls and records waste sorting and outgoing amounts.
- We collect the following waste: cardboard, paper, glass, batteries, ink cartridges, bulbs, cooking oil, aluminum, plastics and bulky materials. Partnerships have been formalized with approved organizations for the collection and recovery of this waste.
- Villa Dubrovnik has established and maintains recycling program for the



common areas, working areas and administrative areas.

- Black and gray wastewater is managed by the City in a non-polluting way and does not affect public health. This is mandatory and unavoidable by Croatian law followed by outside inspection every 6 months.
- All kitchens, restaurant and café areas are provided with marked bins for proper segregation of waste in the specified areas.
- Housekeeping staff: segregation of the waste is done for general waste and paper, glass, can, plastic bottles and cosmetic toiletries and hazard waste
- We reduce packaging and containers for products (e.g. elimination of cardboard for products that are now placed in long-lasting containers, reduction of plastic packaging for welcome slippers and facecloths)
- F&B staff: segregation of waste is done for bio-waste, hazard waste and collection of recycling of all glass, plastic, and cans.
- We are also reducing the packaging of our fresh products by promoting reusable or returnable packaging.
- Engineering segregation of all electrical and electronic waste and printer toner
- Guest room's waste collection: Three separate bags are used to collect general waste and the cans and plastic bottles from all the guest rooms to increase the recycle waste and measure for proper segregation. Special bag for cosmetic bottles collection and disposal in separate bin for collecting.
- All recycled and non-recycled waste must be sorted, collected and stored at separate segregated areas in the garbage area.
- Villa Dubrovnik has in place the procedure for separate discharging of biologic degradable waste (swill) and fats and oils.
- All employees are fully briefed about the benefits of segregation, procedures for collection waste and aware of the Hotel's environmental policies.
- In 2022 we have re-made 150 new decorative pillows for guest rooms from our used covers that no longer served its purpose.
- New standard operating procedure is in place since this year for usage of plastic straws only on guests' request to mitigate its impact on the environment and we replace them with inox or bamboo straws.
- Dental kit for guests is completely recyclable, with packages made from recyclable paper and bamboo toothbrushes.
- Lost and found items after period of 1 year are given to the charity.



MINIMIZING CO2:

- The trees in our garden are preserved and older than hotel's building.
- Maintenance of garden is mostly manually, with organic fertilizers and no pesticides are used whatsoever.
- To reduce use of paper in everyday business, Villa Dubrovnik has introduced in 2018 software System that in integration with our main PMS program becomes the main tool of communication in-between departments. Housekeeping Department calculated that cca 6000 pieces of working sheets are printed less than a season before.
- In 2018 we switched to paperless post- stay surveys for our guests.
- In 2021, we transitioned to digital communication with guests via QR codes, and in 2022, we moved to using a hotel mobile app for guest communication, food ordering, and promotional materials, which are also in digital form.
- Since 2021, guests have been able to read digital newspapers, with access to over 500 publications.
- In 2019 we switched to paperless reservation operation
- Our internal communication, whenever possible, is electronic.
- In 2022, we introduced a digital guest check-in project at the reception using iPads and eliminated the use of paper documents for guest signatures for GDPR compliance and guest registration.
- With the support of EU funds, we have secured a food digester. This
 innovative technology is installed during the hotel renovation in 2024. We are
 extremely proud and excited about it, which highlights our commitment to
 sustainability and responsible environmental practices. The digester is in
 operation to reduce food waste while maintaining the à la carte dining option.
- We started to offset our carbon footprint in 2019 on business related travels and continue to do so every year. Guests are encouraged to do the same via hotel app or on web page https://co2.myclimate.org/en/car_calculators/new.

QUALITY

We are promoting and standing for any business process, activity and standard that can sustain itself economically, ethically and environmentally through creating competitive advantages within the industry by carefully choosing inspired service that not only exceed guest expectations but meet our core values set in environmental policy and our values. Our satisfaction targets are to Increase overall guest satisfaction above 96%, employee satisfaction over 90% and luxury standard quality assurance above 90%.



FOR OUR GUESTS:

- Villa Dubrovnik customer satisfaction is supported through software solution "Review Pro" that is combining all social media and internal guest surveys in one place and in electronically. It is reducing the usage of paper, and it is a great tool for precise calculation of our performance in general and in regards our efforts of environmental preservation.
- Villa Dubrovnik also engages in internal and external evaluations by engagement of mystery shopper's guests by diverse associations specialized in luxury tourism. We are proud to highlight our achievements in service excellence and industry recognition in 2025. In the Leading Hotels of the World Mystery Shopper program, Villa Dubrovnik achieved an outstanding score of 95.4%, ranking 18th out of 674 participating hotels. It is a result that reflects our dedication to delivering exceptional guest experiences and positions us among the very best.
- In addition, we have joined the Forbes Hotels Association and earned recognition with a first a Michelin Key for Hotels, further validating our commitment to the highest standards of quality, hospitality, and luxury. These accolades underscore our ongoing pursuit of excellence and our pride in consistently exceeding expectations across all aspects of our operations.

FOR OUR EMPLOYEES:

- Villa Dubrovnik's Human Resources Department annually conducts, monitors and evaluates satisfaction of our employees and, according to the results, proposes action plans for improvements of working conditions and employees' satisfaction.
- Villa Dubrovnik strictly prohibits all forms of bribery taken directly or indirectly. It
 prohibits its employees from soliciting, arranging or accepting bribes intended
 for the employees' benefit or that of the employee's family, friend associates or
 acquaintances

OUR SUPPLIERS AND PRODUCTS:

- Code of Conduct and Purchasing Policy is set in place to ensure the use of right methods to select suppliers and provide goods and services of the right quality, price, time, source and delivery while protecting the companies' values.
- The main focus is on the suppliers with eco-friendly products and promote on the green purchase. Purchasing is done only through local suppliers and preference given based on the needs and requirements of the hotel:

17 | Page



- Local glass bottled water is only used for guest's needs
- -Our principal welcome amenity for the guests is traditional local dried fruits that have a century long story and are all hand-made with eco certificate.
 -Most of the wines in our restaurant are from local region of Pelješac where traditional, eco-, organic and biodynamic grow of vineyards is flourishing.
- The same focus is on the provision of all food that is served in our hotel
- Villa Dubrovnik encourages small businesses and some of the examples are:
 - We use eco-friendly cosmetics in our spa centre, locally produced with natural Ston salt and rosemary from the hotel garden for guest gifts.
 - The treatment oils are sourced from local producers, including olive and organic domestic oils.
 - In our spa treatments, we use rose oil and creams based on the recipes from one of the oldest pharmacies in Europe, located in Dubrovnik Franciscan Monastery.
 - Gifts for very important guests are handmade exclusively for Villa Dubrovnik by Dubrovnik-based artist Romana Fabris and sculptor Josip Ivanović.
 - Uniforms for all employees are tailored in Croatia and designed by renowned Croatian designer Zigman.
 - All teas for guests in the rooms are from a local producer and have an organic composition, supporting eco-friendly production. Villa Dubrovnik does not engage with local entrepreneurs dealing with historical artifacts.
- The management reviews fair practices based on the election of vendors and materials that are eco-friendly and support the vendors with best environmental practices. Villa Dubrovnik adheres strictly to anti-bribery and corruption, and no forms of bribes or gifts are encouraged. As per Villa Dubrovnik policy, charitable contributions and sponsorships are not used as a subterfuge for bribery.
- Agreements are made with most of the food suppliers on returnable packaging.
- In accordance with Tourist Board of Croatia we recommend as a souvenirs authentically authorized Croatian products, that are from local artisans and hand-made with an emphasis on traditional and cultural aspect.



HEALTH AND SAFETY

Villa Dubrovnik complies with all established health and safety regulations, and prevents accidents for guests, staff and all the stakeholders.

Villa Dubrovnik made all initiatives to make the work environment safe and secure for all the members. All necessary and mandatory safety requirements for the same are in order, such as method statement, risk assessment, and personal protective equipment

- A team of internal auditors for Environment and Health and Safety is established which aim is to conduct and control regular audits for environment and Health and Safety and have a continual assessment of the set standards.
- External local law enforcement Auditors and Agencies regularly visit the premises to ensure all Health & Safety and Fire protection and Environmental protection of Villa Dubrovnik. Villa Dubrovnik undergoes monthly and annual certification and assessment
- The safety of our team members and our guest is one of Villa Dubrovnik main concerns and regular Training program is given to all employees on regular basis and to guest through various signage
- Regular Evacuation and Fire Drills are conducted with our guests followed by audit on all emergency signage and equipment. Last one was in June 2025.
- Fire protection trainings and drills are all in accordance with Croatian Law and done with all employees.
- First aid Team is existing in the hotel to provide first aid and supervise all possible accident situation
- Training in chemicals- The product manufacturer Ecolab conducted training and training materials in the proper use of the product. These include step-bystep instructions for the proper dilution, use, disposal, and the use of the equipment. Cleaning concentrates and dilution control systems to minimize chemical use are in place.
- Kitchen staff are trained in safety and procedures and must undergo a mandatory basic food hygiene certification in food handling.
- Villa Dubrovnik has implemented the Hazard Analysis and Critical Control Point System (HACCP) for food safety.
- Outside audit internal and external on pool water quality, drinkable water and waste water is done on monthly basis and internally is done regularly.
- Regular cleaning and maintaining of HVAC system is done internally and externally and assessed by an outside certified company.



IMPLEMENTATION

Villa Dubrovnik established and maintained the Sustainability Management Plan complying with requirements included in this section.

VILLA DUBROVNIK shall formulate policies, procedures and operations that:

- are appropriate to the nature and scale of the organization's activities.
- are in line with the Four Key SMP areas i.e.
 - o SOCIAL
 - ENVIRONMENTAL
 - QUALITY
 - HEALTH &SAFETY
- includes a commitment to continual improvement of the SMP.
- includes a commitment to comply as minimum with the current applicable legislation's regulations and other requirements to which the organization subscribes.
- provide a framework for setting and reviewing SMP objectives and targets
- are documented, implemented, maintained and communicated to all employees.
- are available to all interested and associates' parties.
- SMP is reviewed periodically to remain relevant and appropriate to the organizations.

GREEN TEAM:

In Villa Dubrovnik there are six passionate heads of department that are selected and appointed for our Green Team Committee to monitor and maintained our Sustainable Management Plan and secure that all procedures and documents are reviewed periodically.

Andrijan Blažević- Front Office Manager Sunčica Štetner Račić- Director of Rooms Division Ivan Gajić- Director of Sales & Marketing Enes Hasanspahić- Restaurant Manager Lana Šegotić- Director of Human Resource Martina Biočić- Assistant Front Office Manager

Revised: June 15, 2025

Green Team meetings are held twice a year, and all-important issues are raised, discussed, planned and recorded in Green Team's Meeting Minutes.



COMMUNICATION STRATEGIES

- We communicate with our guests and visitors to the hotels and through our website and TV in a comprehensive manner.
- Our SMP and Environmental Policy are published on official web site and Info Channel, Hoteza app for the guests as well as Jenz app for the employees
- We involve our guests, example; we have placed water saver cards in all
 the rooms to give our guests an option to participate, hence providing
 them with an opportunity to play a direct role in water and energy
 conservation and decreasing their carbon footprint.
- In post-stay guest's online survey, we have a segment where guests can rate our environmental awareness and a suggestion box for improvements.
- For Villa Dubrovnik employee's informative posters are placed and "Think Green" Suggestion box is available in personals corridor.
- On average 2 hours per month are dedicated to staff training on environmental awareness, sustainability and ideas to participate in local community.
- Sales & Marketing and Guest Relations department elaborate on our guests about the local environment, local culture and cultural heritage through various means such as web page, information booklets and correspondence for guests to embrace a more closely local community and participate in tourism that is environmentally safe and beneficial to the area.
- Through additional contract clauses and annexes we are informing our suppliers about our commitment to saving environment.

21 | Page



IMPROVEMENTS FOR THE FUTURE

It is the intention of the hotel to continue to reduce its environmental footprint by allowing the formulation of improvement / reduction targets while our guests, employees and the community can benefit from our initiatives.

Villa Dubrovnik recognizes its roles and responsibilities in contributing to the sustainable development of the communities in which it operates. This aims at maximizing its active involvement in waste and CO2 reduction, energy savings, water preservation and support to our local community are in reciprocity of minimizing Villa Dubrovnik's carbon footprint and its impact on the environment. Therefore, we commit to following:

- Investment in future in installing Solar Collectors by 2029, with a goal of yearly reduction of CO2 emission in future
- Purchase of hybrid and electric vehicles, as well as an electric scooter, for the hotel fleet by 2026.
- Transition to hotel operations without the use of single-use plastics and paper by 2025.
- Investment in future in purchasing all needed new kitchen refrigerators and chiller systems that are Chlorofluorocarbon free, environmentally friendly with no possibility of emissions.
- Carefully thought community investment program on yearly basis, where we
 identify unique areas of involvement and actively support our local
 communities and engage in a mutually rewarding way with our stakeholders.
- Designing and introducing in hotel Social Engagement Award Program that includes all Villa Dubrovnik's employees that are privately participating in green, humanitarian, educational and volunteering actions by 2026.
- Replacing all plastic amenities in the rooms with recyclable and eco-friendly alternatives and introducing large refillable cosmetic dispensers.
- Natural filtered water is promoted in refillable branded bottles in hotel operations
- Development of exclusively natural hotel cosmetics from a local supplier by 2024, which has been done and in operation since 2025.
- In 2025, we successfully eliminated tablecloths and runners from all food and beverage operations, a step that significantly reduced water and detergent consumption and enhanced the sustainability of our practices
- Focus on more joint clean-sea-actions and humanitarian actions and increase the number of educations and all matters of sustainability.



Villa Dubrovnik believes that striving for our environment and our communities is a responsibility that we all share. This belief is central in our commitment to making a difference in the lives of those people, procedures and actions that we meet every day.

As children and citizens of planet Earth we heartily stand for this responsibility.

Villa Dubrovnik Team

23 | Page

Revised: June 15, 2025