



TSOKKOS

HOTELS & RESORTS

tsokkos.com



CORPORATE SOCIAL RESPONSIBILITY REPORT 2018

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1. Introduction

1.1. About this Report



Our Corporate Social Responsibility (“CSR”) Report is intended to provide our stakeholders information on our Group and to present our approach to sustainable and responsible travel and tourism. We aim to communicate our stakeholders engagement and commitment and to meet our customers’ increasing demand for a more sustainable tourism experience.

CSR reporting allows our stakeholders to make informed decisions on our Group’s contribution to the goal of sustainable development and to assess the Group’s performance in the reporting period.

Through this Report our Group highlights the significant impacts on the economy, the environment and society, and discloses them in accordance with the European Directive 2014/95/EU and with the globally accepted standard, the Global Reporting Initiative (“GRI”) Standards, for both General Disclosures and Topic-Specific Disclosures.

This Report has been prepared in accordance with the GRI Standards: Core option. The Core option contains the essential elements for capturing the economic, environmental and social performance of the Group during the reporting period. The reporting period of our report is the fiscal year 2018 (“FY18”). The data presented in the report is complete, accurate and reliable, and reflects an unbiased picture of the Group’s performance over time.

CSR reporting is our Group’s practice of reporting publicly on economic, environmental and social impacts, and a way to measure and manage the social, economic and environmental effects of our activities. This report helped us to identify areas for improvement in order to improve our service quality and mitigate any social and environmental impacts of our activities.

The CSR Report is available on our website (<https://www.tsokkos.com/company/>). Should there be any enquiries, or comments, please feel free to communicate with:

Chryso Tsokkou

Director

Email: ct@tsokkos.com

H.O. Address: Tsokkos Hotels Building, Aiolias 496, 5292 Paralimni, Famagusta

1.2. Message from the Chairman of the Board

Dear Partners and Valued Guests,

It is a great pleasure to welcome you to the island of Cyprus and to the world of Tsokkos Hotels & Resorts, a public Company with more than thirty-six years of experience in hospitality and tourism industry. We offer a wide range of accommodation with 27 hotels properties to choose from in Protaras, Ayia Napa and Paphos. The Company is an industry leader, with a quality portfolio, prime beachfront locations, loyal customers and pioneer projects.

“Caring” is our strategy. We have the responsibility to care of our guests, the communities that we operate and the natural environment, which is vital to our collective well-being.

We pride ourselves on making sure we know what satisfies our guests. This is our business. We accomplish it through the use of continuous professional planning, precision and care. Our aim is to ensure our guests receive a friendly professional service that is second to none. Our mission is to provide a holiday experience that extends beyond check – in to a more personal service that meets their needs and exceeds their expectations.

In order for people to feel good about visiting us, they need to feel good about our hospitality, our Company as a whole and the impact that we have in our society.

We respect all our stakeholders, as the biggest hotel chain in Cyprus we are trying to help small family businesses as well as big. Our culture is based on treating each employee with the same respect.

Our support to the local communities, our philanthropy program focused on charity with a specific emphasis on people that they do not have the ability to have the essentials to live.

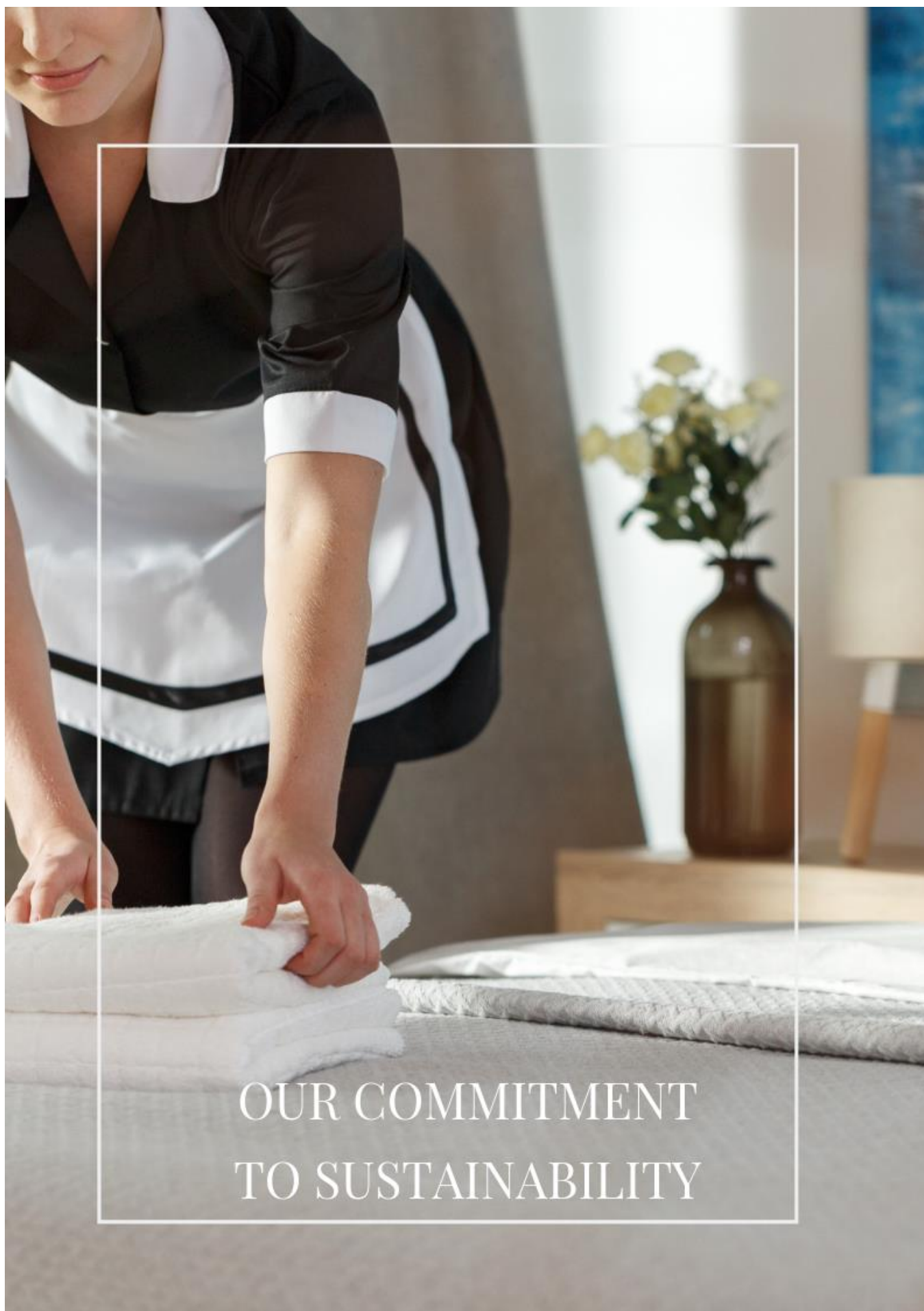
Our planet is changing, the pollution is growing and temperatures are rising. These challenges need collective actions. We are trying to follow our procedures to reduce waste and recycle more.

Our Company is growing and expanding our approach to corporate responsibility is becoming even more significant to our future success.



A handwritten signature in blue ink, which appears to read 'Andreas Tsokkos'.

Andreas Tsokkos
Chairman



OUR COMMITMENT TO SUSTAINABILITY

We truly care for the environment of our community and the support given to the people who live and work in these areas. We are committed to the values of hospitality, social responsibility, ethical behaviour, reliability and we intend to follow fair operating practices. We respect our stakeholder interests and we aim to build long lasting relations with our customers by providing high quality services and making effort for continuous improvement.

With this vision, we apply careful practices to the daily routine of our hotel units:

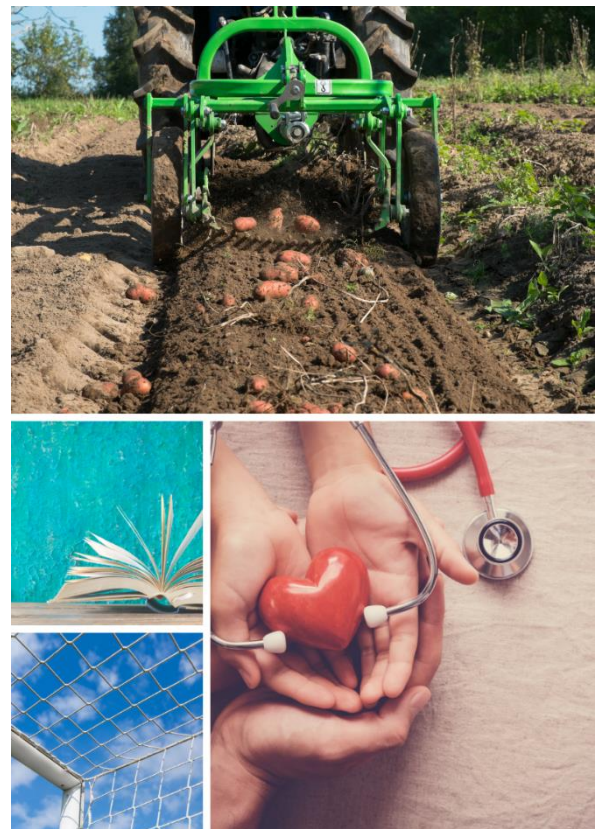
- We strive to be an employer of choice by providing a diverse workplace in which all employees are treated fairly and respectfully.
- We drive respect for human rights across our value chain through training, industry wide commitments, investment in local community and fostering a safe and inclusive working environment.
- We treat guests with respect and offer them high quality products and services which provide the best possible value.
- We aim to protect the natural resources under our influence and ensure that all potential environmental impacts of our operations are mitigated. More specifically, we aim to reduce the usage of resources through a constant monitoring of water and electricity. In addition, we invest in creating our guests' awareness and contribution towards the preservation and waste avoidance of water.
- Our approach to risk management in operational planning, development of new hotel units, renovations or additions, intends to protect the environment and prevent any potential threats.
- We contribute to the social and economic development of the local communities, and we support local community members through the employment and purchase of local services and supplies, while we invest in high quality products produced locally.
- We commit to sustainability through the use of environmentally friendly operating practices and sustainable, recyclable and energy efficient activities.

Corporate Social Responsibility

CSR reporting expresses a commitment of our Group to operate in an economically and environmentally sustainable manner and recognises the interests of our stakeholders. We present important corporate social responsibility and our main concern is to offer to Cyprus society, to Cyprus economy, to tourism industry, to local communities, to the environment, to our visitors and to our employees. Our activities are concentrated in providing support to families and people in need, as well as in the improvement of the quality of life through educational and prosperity-related activities.

Our activities are related to:

- Local Economy
- Society – Volunteering
- Education
- Health
- Sports



Our contributions to the Cyprus Economy

Tourism industry occupies a dominant position in the Cyprus economy and our Group has a significant role in this industry. Our Group has contributed in the enhancement of Cyprus economy by supporting local suppliers and producers.

Our contribution not only has financial benefits for the economy, but also contributes in the development of local entrepreneurship and in the improvement of local production. In addition, our continuous effort for providing high quality services and our future plans for further expansion aim to satisfy visitors and also to attract new markets.

Our Group employs on average more than 1.100 people (on a permanent and temporary basis) and is considered to be one of the biggest employers in the Cyprus labor market. Our vision is to provide a diversified and desirable work environment and competitive employment conditions to our employees. Further, Tsokkos Group investments have strengthened considerably the whole economy of Cyprus.

Every year, Tsokkos Group offers accommodation to more than 200.000 visitors and promotes Cyprus tourist product as one of the best tourism destinations in the Mediterranean.

Our contribution to the Society

Tsokkos Group has an active role in the local communities and aims to improve the quality of life through volunteering. Our Group contributes to the Society, by actively being involved in voluntary organisations and charity institutions, with training, funding, development and support work.

Our core action is related to the 'Center of Offering and Love Saint Christoforos' ("KEPA"). Our actions include the provision of food on a monthly basis, and the provision of additional donations when necessary related to financial support, clothing, kitchen stuff and other raw material.

KEPA supports vulnerable groups of the population through the provision of catering, accommodation and caring, as well as through the operation of an elderly house and the support of third countries in need. We support KEPA since 2000 and our contribution has a valuable meaning for the operations of the organisation.

In conjunction with KEPA, Tsokkos Group employs people from vulnerable groups. This action enables us to integrate them into society as well as to improve their lives and communication with other people.

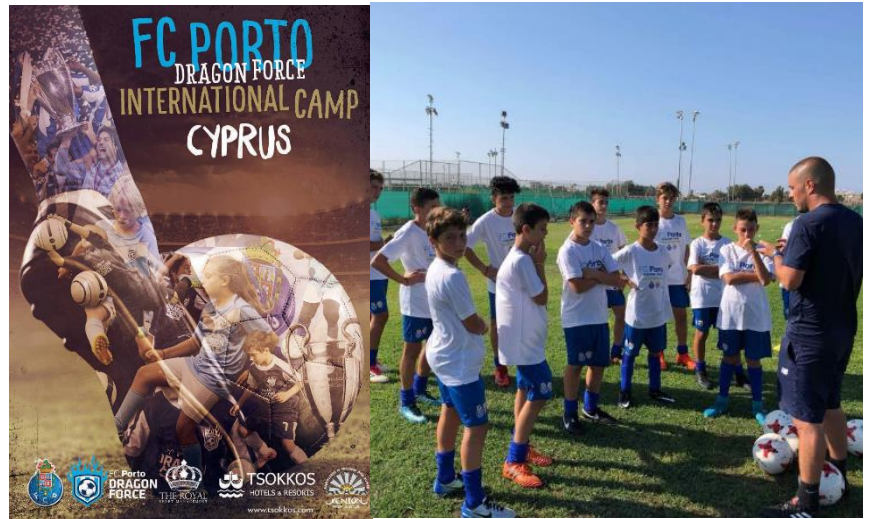
Our social activity, includes the offering of an annual financial reward to excellent students of the area and the establishment of the annual award 'Tsokkos Business Award' which is offered to the best student of Economics in Xenion High School.

Further, our Group willingly accepts students, once a year during the training week of High school, to visit our premises in order to gain experience on the hotel operations.

In addition, we aim to contribute to public health through the organisation of a voluntary blood donation event with the slogan "Donate blood, help save lives". Our Group's staff members and many other volunteers attended the event. Our aim is to continue our efforts to support the blood bank needs, to attract new volunteer blood donors and create cultural solidarity in our Group and in the society.



The Group embraces sports and aims to promote group spirit. An innovative junior event was organized by Tsokkos Group during June to September 2018, the “FC Porto Dragon Force International Camp”, including several sports and educational activities such as football training, waterpark entrance, adventure and beach activities, English lessons, photography academy, dance lessons and art classes. The camp was organized at selected hotels’ premises in Protaras and Ayia Napa, in cooperation with The Royal Sport Management and Xenion High School.



The camp was available for girls and boys between 6 to 18 years old and provided a fascinating opportunity to both locals and tourists to get in touch and make friends from all over the world. Our aim is to continue our efforts to promote sports and group spirit activities and to reorganize similar events in the future.

Tsokkos Group has a wide social contribution, including the provision of support to families and people in need, the provision of free accommodation to charity organisations, contributions to the ‘Animal Assisted Activity’, presentations to schools regarding the protection of the environment and organising volunteering activities.

Materiality Assessment

Materiality is determined through the evaluation of the importance of economic, environmental and social aspects, in order to prioritise the various aspects and identify the material ones we should focus and report on. Topics that are assessed as material, determine the Group's economic, environmental and social impacts and influence the stakeholders' decision making.

Based on the materiality assessment conducted, we concluded in the material aspects related to our activities in respect to economic, environmental and social perspectives. The chart below defines each priority issue addressing our CSR strategy.



Our aims and objectives

Our ambition is to deliver a positive economic, social and environmental impact and our objective is to develop a long-term vision and strategy for sustainable activities. First, we should identify potential CSR activities and create an overview of activities to be undertaken in order to mitigate the social, economic and environmental impact of our Group's activities.

In the following, we should establish mechanism for the implementation and monitoring of the status of our Group's CSR activities. Care for sustainability means constant monitoring and improvements.

New developments on how environmental sustainability is perceived are gradually emerging (e.g. climate change) and will be incorporated into the sustainability strategy of the Group. Our stakeholders' contribution with new ideas is valuable and is always considered.



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GENERAL DISCLOSURE



2.1. Our Business

A. Tsokkos Hotels Public Limited (the “Group”, the “Company”, “Tsokkos Group”) was founded in 1981 by Mr. Andreas Tsokkos.

Initially, the Group’s activities were limited to the construction of hotel units in Famagusta and their leasing to third parties. In 1983, the Company undertook the management of its hotel units and focused on further development through the acquisition of 4* and 3* hotel units in Protaras, Ayia Napa and Paphos.

Today, the Group has a leading position in the tourism and hotel industry, and it is Cyprus' largest hotel chain with the ownership and administration of 28 hotel units and hotel apartments in Protaras, Ayia Napa, Paphos and Sharm el Sheikh (the hotel unit in Sharm el Sheikh is closed since 2014). Also, the Group operates in the land development industry.

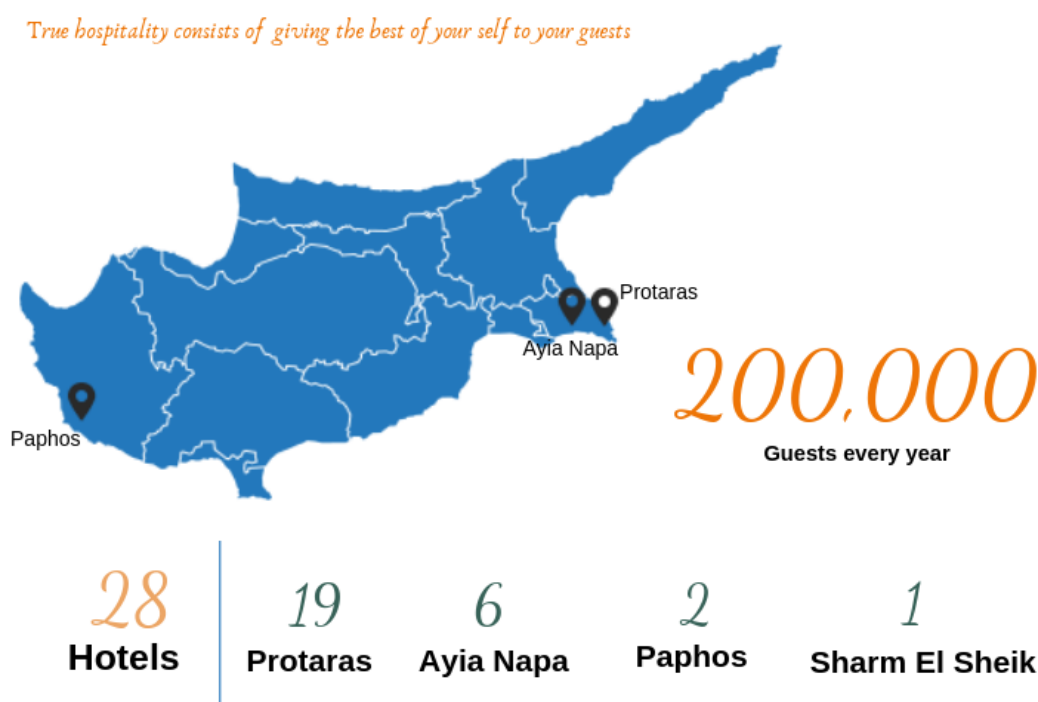
Further expansion is planned through the construction of a 5* hotel, Chrysomare Beach Hotel & Resort, in the heart of Nissi Avenue in the cosmopolitan area of Ayia Napa. The construction of the hotel commenced during last year, 2018, and it is planned that the hotel operations will commence in summer 2020. The future plans of the Group includes the renovation and expansion of the existing hotel units.

The Group counts more than 35 years of presence in the Cyprus tourism market, while it has a significant contribution in the development and upgrade of the Cyprus tourism industry, as well as in the promotion of Cyprus as an attractive tourist destination.

During the latest years, the Group has focused on bigger hotel units with high standards. The Group is driven by the vision for continuous development, improvement and upgrade of the services provided to customers. Each hotel unit has a unique atmosphere promising to provide quality holidays, relaxing time, characterised by hospitality and professionalism.

Tsokkos Group’s main activities rely on Tour Operators who are responsible for the biggest volume of accommodations of customers from abroad. Tsokkos hotels also accept a high volume of individual bookings either from the local areas or from other countries.

The key of success is the adoption of the Group culture with common values and behavior rules, highlighted by integrity, ethos and personal commitment.



Protaras

19

Hotels

Prime Beach
Front Locations

2,312

Rooms



Ayia Napa

6

Hotels

Prime Beach
Front Locations

1,070

Rooms



Daphos

2

Hotels

Prime Beach
Front Locations

578

Rooms



Sharm El Sheikh

1

Hotel

Prime Beach
Front Locations

132

Rooms



2.2. Organisational Profile

Hotel units

Tsokkos hotels operate in high standards and wish to provide high quality holidays in Cyprus. Tsokkos Group has 27 hotels in Protaras, Ayia Napa and Paphos.



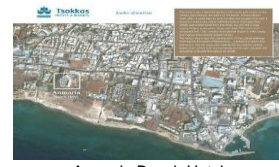
King Evelthon Beach Resort, Paphos



Ascos Coral Beach Hotel, Paphos



Dome Beach Hotel & Resort, Ayia Napa



Anmaria Beach Hotel, Ayia Napa



Tsokkos Paradise Village, Ayia Napa



Napa Tsokkos Hotel, Ayia Napa



Tsokkos Holiday Hotel Apartments, Ayia Napa



Maria Hotel Apartments, Ayia Napa



Constantinos The Great Beach Hotel, Protaras



Vrissiana Beach Hotel, Protaras



Odessa Beach Hotel, Protaras



Tsokkos Protaras Hotel, Protaras



Anastasia Beach Hotel, Protaras



Tsokkos Gardens Hotel, Protaras



Iliada Beach Hotel, Protaras



Silver Sands Beach Hotel, Protaras



Antigoni Hotel, Protaras



Polycarpia Hotel, Protaras



Constantinos The Great Hotel Apartments, Protaras



Tsokkos Garden Hotel Apartments, Protaras



Tsokkos Sun Gardens Hotel Apartments, Protaras



Antigoni Hotel Apartments, Protaras



Marlita Hotel Apartments, Protaras



Papantonia Hotel Apartments, Protaras



Athena Beach Villas, Protaras



Anastasia Hotel Apartments, Protaras



Polycarpia Hotel Apartments, Protaras

2.2.1. Ownership and Legal Form

The Group was founded in 1981 and since incorporation was guided by Tsokkos family. In 2000, Tsokkos Group was listed on the Cyprus Stock Exchange ("CSE") and has an issued share capital of 251.200.000 shares. In 2004, Tsokkos Group was listed in the Main Market of the CSE and in the FTSE/CySE 20 index.

Shareholder structure:

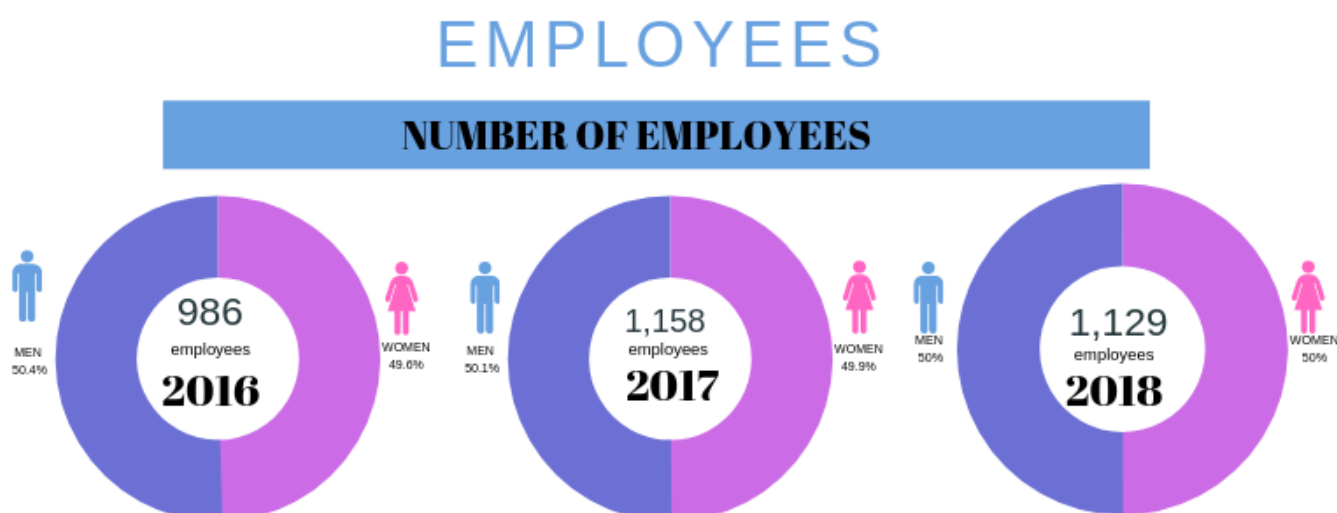
Tsokkos Family	73,47%
Free float	26,53%

2.2.2. Scale of the Organisation

Currently, Tsokkos Group operates 27 properties in Cyprus and their availability exceeds 9.500 hotel beds. Further to 2018 renovations, we have added 51 new rooms at Silver Sands Beach Hotel (a total of 183 rooms), 39 new rooms at Constantinos the Great (a total of 192 rooms) and 53 new rooms at Tsokkos Protaras Beach Hotel (a total of 247 rooms).

2.2.3. Information on employees

In 2018, the Group employed on average 1.129 employees out of whom 291 are permanent and 838 are temporary mostly for the summer season from April to October. The below table provides information on employees for the last four years, distinguished by gender and by region. Tsokkos Group contributes to the Cyprus economy as one of the biggest employers and is sensitive to issues of equal opportunities and respect of human rights.



Year	Category	2015	2016	2017	2018
Average number of employees					
Permanent		420	349	310	291
Temporary		515	637	848	838
Total Number of employees		935	986	1.158	1.129
Gender (%)		%	%	%	%
Male		50,33	50,43	49,88	50,05
Female		49,67	49,57	50,12	49,95
Region					100
Paphos	Permanent	126	123	94	92
	Temporary	78	134	189	178
		204	257	283	270
Ayia Napa	Permanent	110	90	84	70
	Temporary	99	137	173	157
		209	227	257	227
Protaras	Permanent	184	136	132	129
	Temporary	338	366	486	503
		522	502	618	632

Taking into consideration the seasonality of the tourism industry, the average number of employees per year was calculated based on the total days worked as per the payroll reports.

The total days were divided by 365 by the opening days of each hotel, in order to calculate the average number of employees.

Tsokkos Group also maintains collective agreements with Pancyprrian Federation of Labour (PEO) and Confederation of Cyprus Employees (SEK).

2.2.4. Supply Chain

Supply chain mapping is important for us in order to realise our main corporate social responsibility stakeholders. Tsokkos hotels mainly procure from local suppliers, who have a central position in the supply chain of the Group. Key procurement categories include food and beverage, furniture, equipment, maintenance and construction services, corporate, consulting services, etc.

Our Group aim to build long-lasting cooperation with our suppliers and service providers. We prioritise and we invest in high quality products and services and we significantly support our local suppliers and our local community. The 87% of our suppliers and service providers is located in Cyprus and specifically in our local communities.

Tour Operators also contribute significantly in the supply chain of the Company. Our Group collaborates with more than 30 Tour Operators, both locally and internationally. Throughout the years, we have created important relationships with our Tour Operators who have a central role in our Group's operations.

Tour operators have an effective contribution:

- Our promotion abroad.
- In meeting the goals of sustainable tourism development.
- Protecting the environmental and cultural resources on which we rely on for meeting our high quality standards.
- For future growth.

Services are delivered to customers, who consist the last and the most important part of the supply chain. We deliver customer-oriented services and we aim not only to meet but also to exceed the expectations and the needs of our customers. In this way, we aim to create loyalty for our Group and to build and maintain long term relationships with our customers.

No significant changes took place in the supply chain and in the operations of the Group during the latest years.



2.2.5. Awards

Tsokkos Group provides high quality services and is distinguished by high standards. Our Group intends to surpass customers' expectations and our hotels are designed to serve various different customer categories who either look for luxury relaxing holidays, entertainment or family oriented atmosphere. We make effort to fulfil each different requirement and provide best quality service to our customers. Our hotels have been awarded for their excellence and the provision of high quality services and our customer satisfaction keeps rising.



Trip Advisor Award - Top 25 Luxury Hotels - Cyprus
King Evelthon Beach Hotel & Resort 5*, Paphos - 25th place



Top 25 Luxury Hotels — Cyprus

UNITED STATES WORLD REGIONS

25 King Evelthon Beach Hotel & Resort

Paphos, Cyprus



"Just return from King Evelthon Hotel after 2 weeks holiday and getting married there"

"Amazing week!"

[View deals](#)



InBusiness - The 8th Biggest Employer in Cyprus

8 TSOKKOS HOTELS PUBLIC

ΗΛΙΚΙΕΣ
18-25: 27%
26-35: 24%
36-45: 22%
46-63: 27%

ΠΡΟΣΩΠΙΚΟ 2.000
Ποσοστιαία αύξηση στον αριθμό του προσωπικού σε σχέση με πέρσι: Στα ίδια ποσοστά, ο αριθμός προσωπικού παρέμεινε ο ίδιος.

ΦΥΛΟ ΠΟΣΟΣΤΟ
ΑΝΤΡΩΝ 49,45%
ΚΑΙ ΓΥΝΑΙΚΩΝ 50,55%

ΠΑΡΟΥΣΙΑ
Sharm El Sheikh στην Αίγυπτο



Trip Advisor Award - Top 25 Hotels for Families - Cyprus
Dome Beach Hotel & Resort 4*, Ayia Napa - 7th place



Top 25 Hotels for Families — Cyprus

UNITED STATES WORLD REGIONS

7 Dome Beach Hotel & Resort

Ayia Napa, Cyprus



"The Gillens' for the 'Rowe Wedding'"

"A holiday we'll remember!"

[View deals](#)



Biblio-Globus Award
Best Cyprus Partner Award 2017



Expedia Group – Outstanding Quality Score & Outstanding Loyalty Program Performance 2018





Trust You (TY) –
Overall
Performance
2015-2018



» Overall Score » Constantinos the Great Beach Hotel
Time filter: From 2015-01-01 To 2015-12-31



» Overall Score » The Dome Beach Hotel & Resort
Time filter: From 2015-01-01 To 2015-12-31



» Overall Score » King Evelthon Beach Hotel & Resort
Time filter: From 2015-01-01 To 2015-12-31



» Overall Score » Vrissiana Beach Hotel
Time filter: From 2015-01-01 To 2015-12-31



» Overall Score » Constantinos the Great Beach Hotel
Time filter: From 2016-01-01 To 2016-12-31



» Overall Score » The Dome Beach Hotel & Resort
Time filter: From 2016-01-01 To 2016-12-31



» Overall Score » King Evelthon Beach Hotel & Resort
Time filter: From 2016-01-01 To 2016-12-31



» Overall Score » Tsokkos Paradise Village
Time filter: From 2016-01-01 To 2016-12-31



» Overall Score » Constantinos the Great Beach Hotel
Time filter: From 2017-01-01 To 2017-12-31



» Overall Score » The Dome Beach Hotel & Resort
Time filter: From 2017-01-01 To 2017-12-31



» Overall Score » King Evelthon Beach Hotel & Resort
Time filter: From 2017-01-01 To 2017-12-31



» Overall Score » Odessa Beach Hotel
Time filter: From 2017-01-01 To 2017-12-31



» Overall Score » Constantinos the Great Beach Hotel
Time filter: From 2018-01-01 To 2018-12-31



» Overall Score » The Dome Beach Hotel & Resort
Time filter: From 2018-01-01 To 2018-12-31





Tsokkos Group seeks to meaningfully support inclusive economic growth through sustainability and social impact initiatives. We are focused on creating programs and opportunities that not only benefit our communities, but also strengthen our business and demonstrate how responsible hotel management creates economic opportunities and contributes to the development of local communities. Our operations are based on the respect of the environment and the society, and we draw high attention on health, security, quality and energy management.

Tour operators	Develop further the excellent business relationship maintained with the biggest Russian and European Tour Operators.
Cost of operations	Control the cost of our operations without reducing the level and the quality of services provided. Energy and water consumption are emerging topics which seize our attention and we investigate methods to measure and mitigate our consumption.
Inland tourism	Further establishment of the Group as the first choice of Cypriots for inland tourism.
Tourist product	Continuous upgrade of the quality of tourist products offered by the Group. This is achieved through continuous renovation of our hotel units and further improvement of the quality of our services.
Expansion of operations	Our future plans include the construction pipeline of a 5* hotel unit in a strategic position in Ayia Napa and the expansion of tourism operations in the management of restaurants and bars taking advantage of the premium location of our hotel units.

During 2018, our Group commenced the construction of a 5* hotel, Chrysomare Beach Hotel & Resort, in the heart of Nissi Avenue in the cosmopolitan area of Ayia Napa. The hotel is located on a seaside area on Sandy Bay, which is one of the best blue flagged and golden sand beach of the island. The construction of the hotel is currently in process and it is planned that the hotel will be available to welcome its first visitors in summer 2020.

Renovations and upgrades of existing hotel units and room additions took place during November 2017 to March 2018, in Constantinos the Great, Tsokkos Protaras Hotel and Silver Sands Beach Hotel, taking into advantage the incentives provided by the Cyprus government on urban planning permissions with the target of further business development.

Constantinos the Great

- Expansion
- 39 New rooms
- New floor
- 192 total number of rooms
- Renovated Areas:
Rooms, balconies, restaurants, lobby, hotel entrance, swimming pool area.

Tsokkos Protaras Hotel

- Expansion
- 53 New rooms
- New floor
- 247 total number of rooms
- Renovated Areas:
Rooms, Lobby Area, Bar, Restaurant, connecting building between the main hotel and annex.

Silver Sands Beach Hotel

- Expansion
- 51 New Rooms (including Suites)
- 183 total number of rooms
- 2 New floors
- Plans in place for Roof Bar

Our future plans include further expansions and upgrade of the existing hotel units. We aim to provide high quality services and to promote sustainable tourism. Therefore, we continuously seek for new and innovative development opportunities with sustainable solutions.

2.3.1. Membership of Associations

Tsokkos Group is an active member in important Associations in Cyprus which deal with the promotion and the development of the hotel industry.

- **Cypriot Chamber of Commerce and Industry (CCCI):** The CCCI is the union of Cypriot businessmen, the interests of whom it promotes by submitting to the government and the Parliament the members' positions on matters in which they are involved (<http://www.ccci.org.cy/>).
- **Cyprus Hotels Association (CHA):** The CHA intends on the protection and promotion of the interests of the hoteliers as employers and as professionals, as well as on the upgrading and development of the hotel establishments in Cyprus and the improvement of the professional level of the hoteliers (<http://www.cyprushotelassociation.org/>).
- **Famagusta Tourist Development and Promotion Company:** Intends to promote local tourism both locally and internationally, and also intends to resolve any issues concerning tourist problems in the district.

Additionally, Tsokkos Group implements cooperation agreements with important associations regarding the employment of local or international students for training and the employment of unemployed people through government subsidised programmes.

- **Higher Hotel Institute of Cyprus (HHIC):** (www.mlsi.gov.cy/mlsi/hhic/hhic.nsf/)
- **International Universities through 'Erasmus' programmes**
- **Cyprus University of Technology** (<https://www.cut.ac.cy/faculties/fme/html/>)
- **Human Resources Development Authority of Cyprus (HRDA):** (<http://www.hrdauth.org.cy/>)
- **Department of Labour: Programme for Employment Incentives**
(<http://www.mlsi.gov.cy/mlsi/dl/dl.nsf/>)

2.3.2. Key impacts, risks, and opportunities

Our Group actively measures and manages key risk impacts from activities. Main risk areas identified during the previous years are mentioned below:

Risks

Tsokkos Group operates in a high competitive market and faces high market risk. Our hotels operate in high standards and we continuously seek for further development and improvement of our services in order to meet our customers' needs and keep our leading position in Cyprus tourism and hotel industry.

Climate change and the continuous drought periods in Cyprus consist significant concerns to the local community and of course, our Group. Tsokkos hotels' operations depend to a high extend on energy and water consumption, which consist emerging topics for our Group. We make intensive efforts to mitigate our consumption and adopt an environmental protective culture without reducing the quality of our services.

Credit risk consists another important risk for Tsokkos Group caused by stakeholders' weaknesses to settle their obligations, which directly affects our liquidity. Tsokkos Group intends to mitigate credit risk, by reassessing the reliability of its stakeholders upon their history and applying monitoring procedures for receivables.

International tourism trends also affect our operations, which are highly depended on tourism fluctuations in Cyprus. Geopolitical tensions in the Eastern Mediterranean may negatively affect the tourism industry in Cyprus and hence the operations of our Group. In addition, high competition in both global and local markets may also affect tourism. All of the above, highlight the need for sustainable tourism.

Brexit may also negatively affect tourist arrivals in Cyprus, since a significant percentage of repetitive tourist arrivals originates from the United Kingdom. Brexit may create various challenges for UK tourists, such as exchange rate fluctuations and increased travelling fees. These problems may discourage UK tourists to visit Cyprus and they may seek for alternative, cost efficient destinations. Our Group has close communication with Tour Operators regarding this issue and we are going to apply the necessary actions in order to mitigate the risk. Regardless, no tourism reduction is expected for 2019 due to Brexit.

Opportunities

Tourist arrivals reached to a high peak during the last three years and our hotels were fully booked during summer period. More specifically, during 2018 four million tourists visited Cyprus, which is a record year for the Cyprus tourism industry. Estimations for tourist visitors reveal an increasing trend for 2019, which promises another successful year for our Group.

Increasing tourist arrivals provide an opportunity for further development for our Group. Our plans include further expansions and the construction of a new high standard hotel in Ayia Napa which promises to be a strategic position in the following years after the construction of Ayia Napa Marina. Ayia Napa is a promising area which will bust tourism and develop opportunities for further development in the area.

Tourist influx also tends to increase for the low season periods, i.e. during the months between November to March, which provides a growth opportunity for our Group. Year after year, more tourists visit Cyprus in low season periods. Our Group takes advantage of these opportunities and plans to provide all year long accommodation in specific hotel units, including the new luxury 5* hotel which is currently under construction.

Tourism preferences tend to change throughout the years. Relaxing and sunny holidays by the sea were traditionally the main reasons for visiting Cyprus. Nowadays, apart from the traditional tourism products, visitors seek for alternative types of tourism, including wellness, sports, business and cultural tourism. Our Group proceeds to the relevant actions in order to meet the visitors' needs. In this respect, most of our hotel units provide spa services, gym and conference rooms, amongst other facilities. Tsokkos Group contributes to the development and promotion of Cyprus as an attractive tourist destination and aims to remain preferable for both local and international customers.

A photograph of a person's hand placing a vibrant pink flower on a white bedsheet. The background is softly blurred, showing a hotel room interior with a lamp and furniture. The entire image is framed by a thin white border.

ETHICS & INTEGRITY

2.3.3. Values, principles, standards, and norms of behaviour

Values

Our core values are incorporated in the culture of our Group, and provide the fundamentals for our success. Our general approach is concentrated in the compliance with legislation, respect for human rights and commitment to environmental protection.

Reliability: Nothing is more important than maintaining the confidence and trust of the Group's customers.

Hospitality: Offer unique services to customers through the provision of quality holidays tailored to their needs.

Continuous improvement: Achieve higher results. As a leader in the industry, try to learn and improve continuously.

Teamwork: Employees work towards a common target through partnership and teamwork. We support, believe and invest in Company's workforce.

Reliability: Building long-term relationships with customers, employees and partners, which are based in trust, integrity and respect.

Social Responsibility: Caring not only for Group's customers and hotels but also for the society and environment in which the Company operates.



2.4.2. Mechanisms for advice and concerns about ethics

We respect for the privacy and confidentiality of the personal identities of the employees. Preservation and processing only of the personal data that is necessary for the effective functioning of the Group and compliance with the applicable law.

Compliance with the applicable law and making constant efforts for the improvement of policies related to workforce's safety and health by offering appropriate education to our employees.

Respect and commit to protect secrecy, protect the confidentiality of information and secure data or trade secrets that customers, suppliers or other partners entrust to the Company.

Commitment to secure that the Company's activities are conducted within the framework of fair competition and in accordance with the relevant legislation.

All transactions conducted by the Company, should take place in a legal and ethical manner, according to the applicable law and internal rules of the Company.

Responsibility that all documents are clear, accurate, correct and that do not include false information, as they form the basis for the management of Company's operating activities and the fulfillment of the obligations towards the Company.

Compliance with legal and statutory requirements is a prerequisite for maintaining the authorisation of the hotels.



GOVERNANCE

2.4.1. Governance structure

Tsokkos Board of Directors (“BoD”) is the highest governance body and is responsible for controlling and overseeing the entire Group. They are responsible for goal development, strategic planning, policies, and make decisions on the future direction of the Company.

Board of Directors

- **Chairman: Andreas Tsokkos**
- **Managing Director: Anastasia Tsokkou**
- **Executive Director: George Tsokkos**
- **Executive Director: Chryso Tsokkou**
- **Independent Non-Executive Director: Nestoras Kyriakides**
- **Independent Non-Executive Director: Constantinos Schizas**
- **Independent Non-Executive Director: George Hadjiyiannis (appointed on 30/8/2018)**

Mr. Andreas Tsokkos is an Executive Director and the Chairman of the BoD. Mr. Andreas Tsokkos was the founder of Tsokkos Group and has a leading position in the Company.

Board Committees

Board committees meet according to their task, and as specified in their terms of reference and they are made up of a sub-selection of board members. The BoD has established the following Committees:

- **Nomination committee**
- **Remuneration committee**
- **Audit Committee**
- **Risk Management Committee**

Selection of the BoD

The selection of the highest governance body, the BoD, is based on criteria of personal qualifications such as background experience, technical skills and personal characteristics, including personal integrity and judgement.

Our principles highlight the importance of independence, equality and diversity. The BoD consisted of professionals and included three non-executive directors and two executive directors (excluding the Managing Director and the Chairman).

Roles and Responsibilities of the BoD

The BoD is responsible for decision and policy making. By reviewing and evaluating present and future opportunities, threats and risks in the external environment, the BoD establish the strategic direction, the vision and the values of the Company.

Evaluation of the BoD

The BoD and the Committees perform an informal evaluation of their performance on an annual basis. The Directors are asked to assess the effectiveness of the BoD and the establishment of the objectives settled, and recommend changes where necessary.

2.4.2. Delegating authority

Tsokkos Group deals with economic, environmental, and social issues with high concern. The BoD is responsible to handle any emerging issues and take decisions on their resolving.

We follow an upside – down approach for resolving any critical issues. The BoD inform the Hotel Operation Managers and the Head of the departments on the decisions taken, who in turn inform lower level employees regarding economic, environmental, and social issues.

Hence, the lower level employees are responsible to acknowledge the senior executives on any issues arise, so that the BoD is able to handle accordingly.

The BoD is responsible to deal with economic, environmental and social issues in consultation with stakeholders. Measures are taken to continuously develop and enhance the BoD's collective knowledge on economic, environmental, and social topics, through face to face discussions, conference calls, meetings and emails as feasible and in accordance to the importance of each case.

2.4.3. Conflicts of interest

Conflicts of interest arising from any personal, economic or political activities, are not accepted in our Group and each one of our managers or employees is expected to act in the best interest for Tsokkos Group. Our Code of Conduct defines the main areas that may lead to conflict of interest and suggests how to deal with such cases that may create conflicts of interest:

- Family Members
- Secondary Employment
- Investments
- Use of the Group's premises for personal benefit

2.4.4. Communicating critical concerns

Critical concerns are communicated to the CEO by the Operational Managers and the Head of Departments. In case of a top critical issue, the CEO informs the BoD in order to settle accordingly.

2.5.5. Remuneration policy

Tsokkos Group offers a remuneration package in line with the local standards and with the labour market conditions in order to be a competitive employer. Market research is conducted in order to gather information on the market remuneration level and develop a competitive remuneration policy.

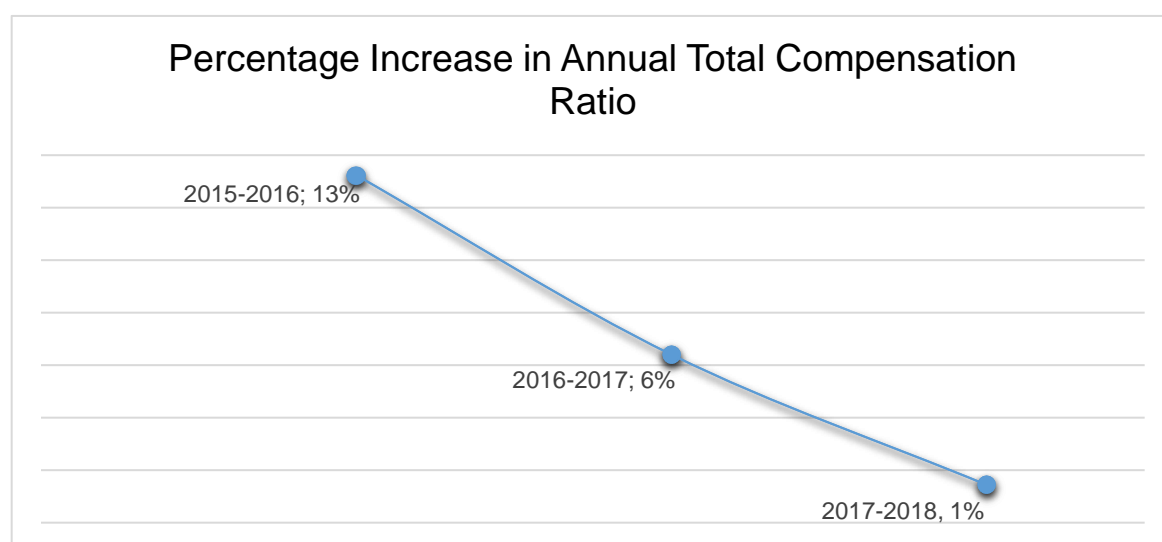
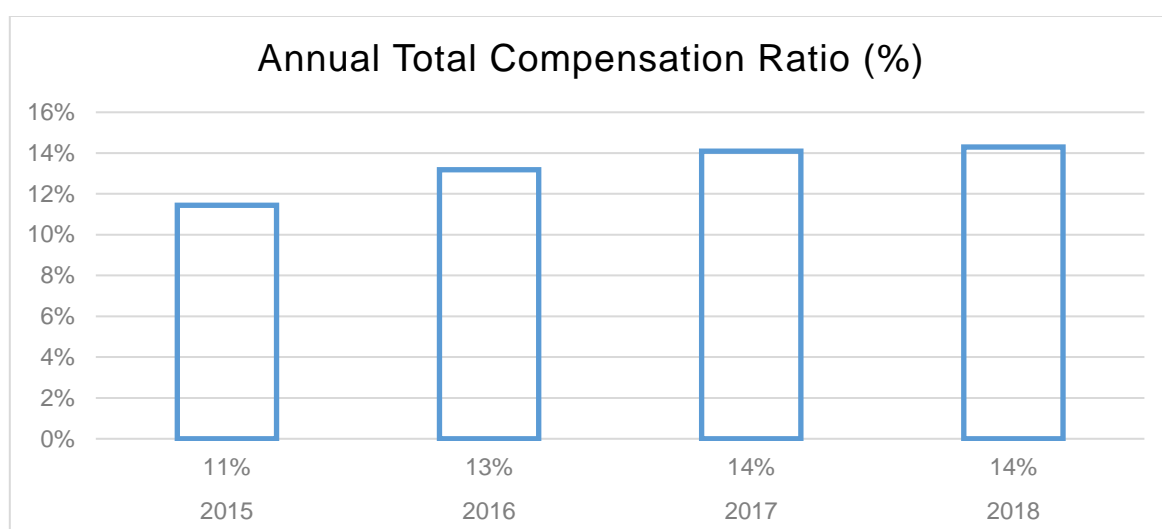
The first figure below presents the ratio of the annual total compensation for the Company's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual).

The second figure presents the ratio of the percentage increase in annual total compensation for the Company's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual).

An important increase in the annual total compensation for all employees took place in 2016, while a lower percentage increase took place in 2017 and 2018 respectively. The ratio may serve as an indicator for monitoring how the Company treats its employees. The chart reveals a reducing trend of the variance among the highest to the average employees' salaries.

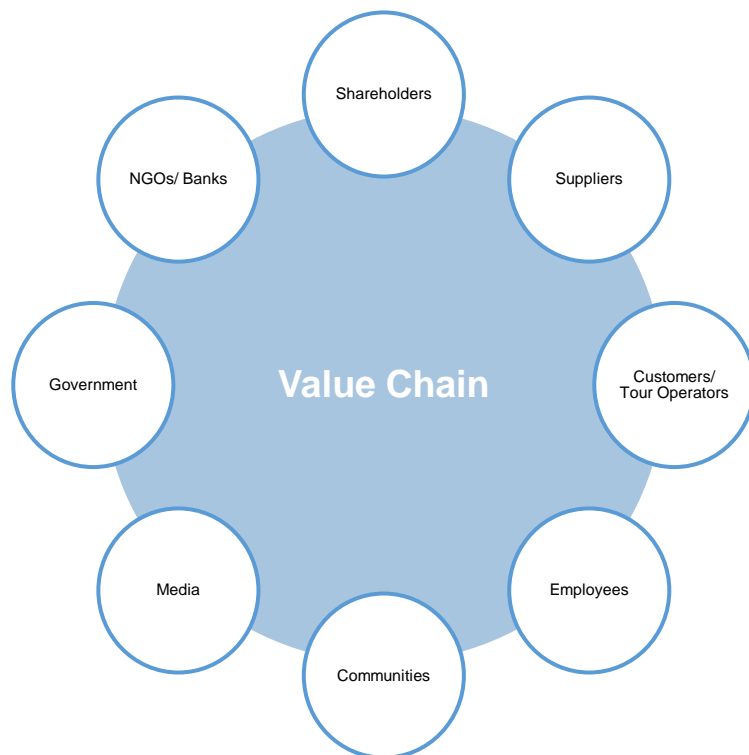
The remuneration policy of our Group reflects transparency and integrity values, while the Company's employees are valuable and are equally treated. Fair and responsible remuneration policy contributes to the positive spirit and team working of our Group.

The Remuneration Committee is responsible for determining, assessing and monitoring the remuneration policy on behalf of the BoD. Further, the Committee is responsible for determining the criteria to be used in remuneration policy in connection with the evaluation of the Company's and members' performance.



2.5.6. List of stakeholder groups

Our value chain includes the main stakeholders of Tsokkos Group as depicted below:



Approach to stakeholder engagement

We intend to build long term relations with our stakeholders and we respect their interests. Stakeholders have a significant contribution to the value chain of Tsokkos Group and we intend to gain their trust and increase their engagement.

We pay high attention to the adequacy of customer satisfaction, which can provide information on the degree to which the organisation considers the needs of stakeholders. Tour operators provide questionnaires to customers and the final scoring is provided to Tsokkos hotels as a feedback for the assessment of their accommodation.

In addition, suppliers are communicating on a daily basis with the purchasing department and provide their feedback in respect to satisfaction for the business communication.

Selecting stakeholders

Stakeholders have an important contribution to the operations of our Companies and for this reason we pay high attention to the selection of our stakeholders.

Our criteria for selecting our stakeholders include the assessment of their experience in the market and their reliability as well as their going concern. Based on the needs of our Group, we prioritise our stakeholders also based on any previous collaboration. Further, we prioritise local suppliers, intending to support the local communities and the local economy.

2.5.7. Key topics and concerns raised

Understanding the needs of our stakeholders is important for the development of our strategy, sustainability, social impact and reporting.

To develop the CSR Report we interviewed executives and hosted workshops in order to gather the required information. We also conducted a materiality assessment in order to address the GRI Disclosures in respect of the economic, environmental and social pillars.

2.5.8. Entities included in the consolidated financial statements

Tsokkos Group Consolidated financial statements include the subsidiaries of the Group as depicted below.

A. Tsokkos Hotels Public Ltd	Zebalos Enterprises Ltd	King Evelthon Hotel Ltd
Andreas Tsokkos & Co (Cleopatra)	Rock Amour Estate Company Ltd	Annmaria Hotel Ltd
A. Tsokkos Properties and Leisure Ltd	Odessa Hotels Ltd	Tsokkos Dreams Hotels Ltd
Tsovaco Hotels Ltd	Medis Developments Ltd	Tsokkos Gardens Hotel Ltd
Savoy Properties Limited	Betraco Ltd	Tsokkos Mare Hotel Ltd
C.A. Holdings Limited	Islandwide Hotel Enterprises Ltd	Tsokkos Protaras Hotel Ltd
Meandros Hotel Apt Ltd	A Tsokkos Paradise Ltd	Tsokkos Holdings Ltd
Dome Investments Public Company Ltd	Diomedes Hotels Ltd	Vikarta Ltd
Graicias Holdings Ltd	A.Tsokkos Developers Ltd	Anastasia Tsokkou Estates Ltd
M.C. (Greece Accommodation Direct) Ltd	Abella Cambus Ltd	A.C.C. Hadjichristou Bros Ltd

2.5.9. Defining report content and topic Boundaries

Our CSR Report has been prepared in accordance with the new GRI Standards and follows the Reporting Guidelines as defined by the GRI.

The preparation of the CSR Report includes the development of our materiality assessment, which included interviews and workshops with representatives of Tsokkos Group Departments who provided qualitative and quantitative information on the operations of the Group.

The goal of the assessment was to address the most important topic specific disclosures reflecting Tsokkos Group operations in respect to economic, environmental and social aspects. In addition, the materiality assessment intends to ensure that Tsokkos Group addresses the right sustainability and social impact topics, as well as to identify how we can continue improving our sustainability and social impact strategies.

The topic-specific disclosures reflect the outcome of our materiality assessment. The first parts (Sections 1 & 2) of the report presents the general information of our Company, whilst the following part (Section 3) concentrates on the topic-specific disclosures as applicable for Tsokkos Group.

2.5.10. List of material topics

Based on the materiality assessment conducted, we concluded to the material aspects related to our activities in respect to economic, environmental and social perspectives, as follows:

Economic: Economic Performance; Market Presence; Indirect Economic Impacts; Procurement Practices.

Environmental: Water; Energy.

Social: Employment; Occupational Health and Safety; Training and Education; Diversity and Equal Opportunity; Local Communities; Customer Health & Safety; Customer Privacy.

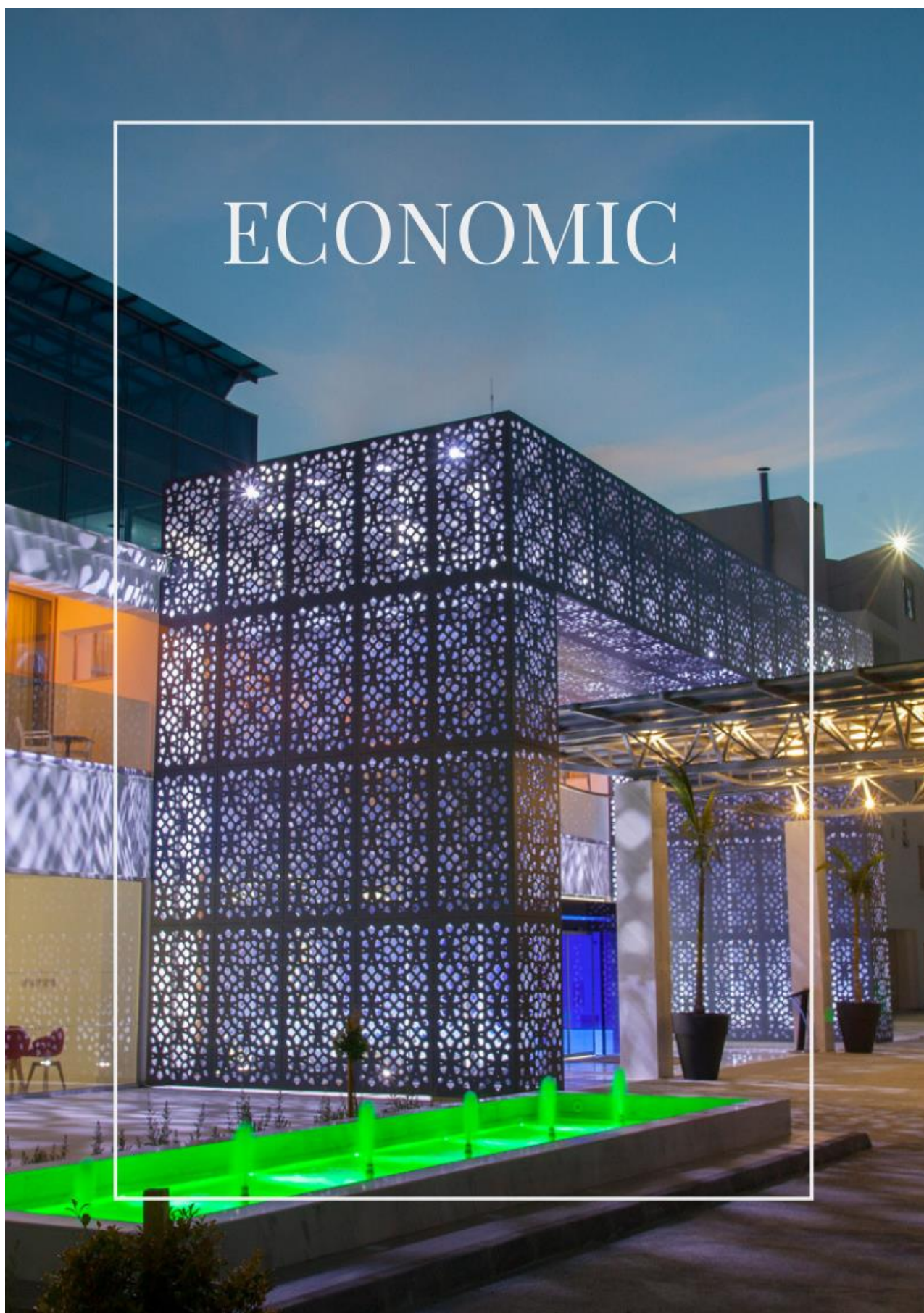
2.5.11. Reporting period

This report presents the Corporate Social Responsibility aspects followed by Tsokkos Group during the year 2018. This is the second CSR Report for Tsokkos Group.

The CSR Reporting of the Group is going to be conducted on an annual basis, and any changes or restatements are going to be included in the following year's reports.

The report includes information for the FY18, which is compared to information for the FY17, FY16 and FY15. Predictions for the short-term periods are included, as available.

3. Topic Specific Aspects



3.1.1. Economic Performance

- Disclosure 201-1: Direct economic value generated and distributed. An organisation calculates revenues as net sales plus revenues from financial investments and sales of assets.

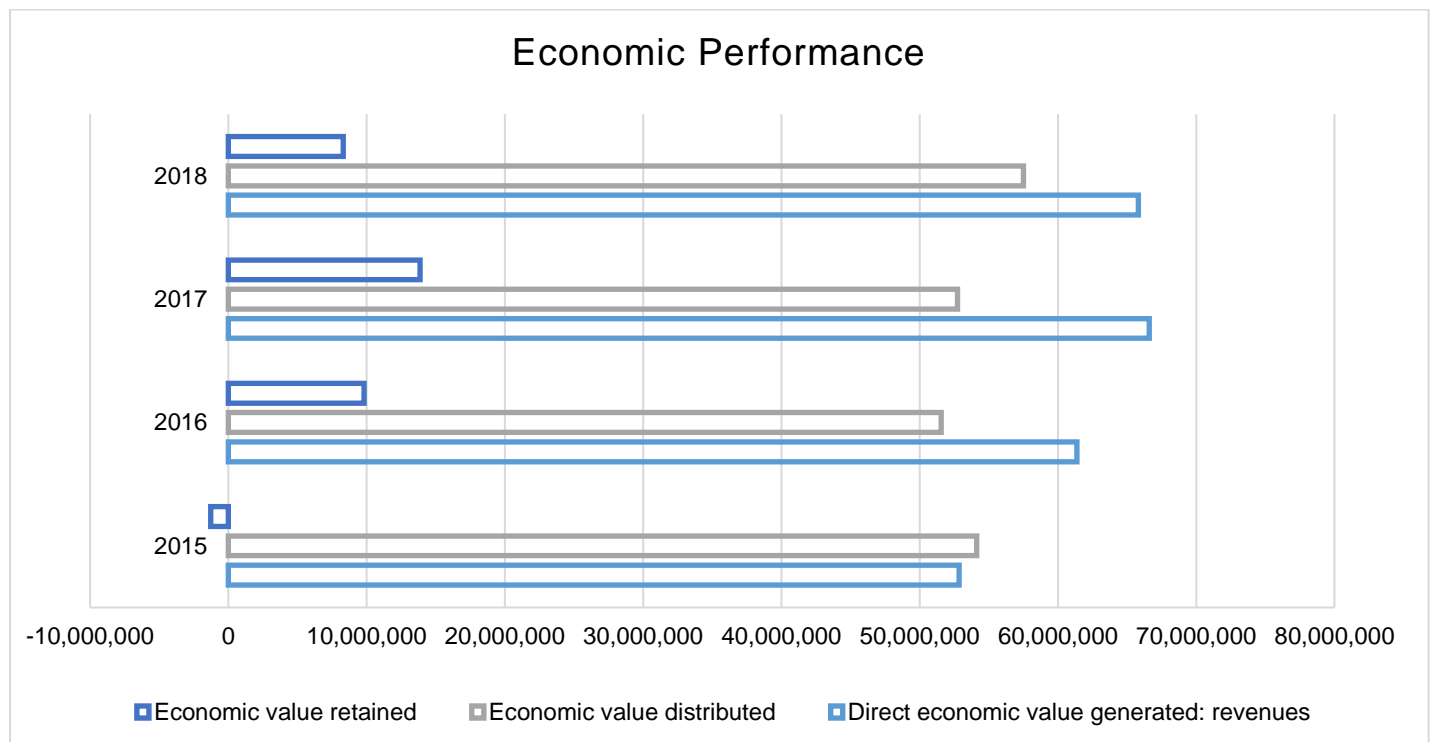
The degree of economic performance is valued to a considerable extent in our Group, as it is a significant point of interest for our stakeholders. It is important to maintain a strong positive economic performance, managing successfully the units under operation, generating growth and ensuring that stakeholders are satisfied related to their investments associated with Tsokkos Group.

Our Group remains strong as a result of skilled management teams, dedicated associates and quality customer service. We continue to invest in our hotel units by means of new renovated properties aiming to exceed our customers' expectations.

Tsokkos Group's economic performance is measured by the direct economic value generated including:

- (i) Direct economic value generated (revenues).
- (ii) Economic value distributed, including operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments.
- (iii) Economic value retained calculated by direct economic value generated less economic value distributed.

Tsokkos Group has a positive economic performance and during the reporting period the Group stimulates a rising profitability and increasing economic value distributed to stakeholders.



3.1.2. Market Presence

- Disclosure 202-2: Proportion of senior management hired from the local community.

Having a strong market presence is important for our Group since it is linked to growing reputation and stability. Market Presence is measured by the proportion of senior management hired from the local community, including employees either born or who have the legal right to reside in the same geographic market as the operation.

The geographical definition of local includes the community surrounding operations. Including members from the local community in an organisation's senior management demonstrates the organisation's positive market presence. Including local community members in the management team enhances human capital and increases the economic benefit to the local community by improving the Company's ability to understand local needs.

Tsokkos Group has an important Market Presence in the local area based on the proportion of senior management hired from the local community. Additionally, a high proportion of our employees are hired from the local community.

Directors	Number	%
Local Community (Executive)	4	57%
Local Community (Non-Executive)	1	14%
Non Local Community (Non-Executive)	2	29%
Total	7	100%

Senior Management	Number	%
Local Community	32	100%
Non Local Community	-	-
Total	32	100%

3.1.3. Indirect Economic Impacts

- Disclosure 203-2: Significant indirect economic impacts.

Tsokkos Group aims to support local communities and follows a sensitive approach to topics of youth unemployment and education.

Our Group attracts young people of the local communities by offering career opportunities, training and development. Tsokkos Group implements cooperation agreements with important associations regarding the employment of local or international students for practical training.

Tsokkos Group collaborates with both local and international educational institutions for the employment of young people and offers the opportunity to gain experience in the tourism and hotel industry. Further, Tsokkos Group hires unemployed people through government subsidised programmes in its support to the Cyprus economy.

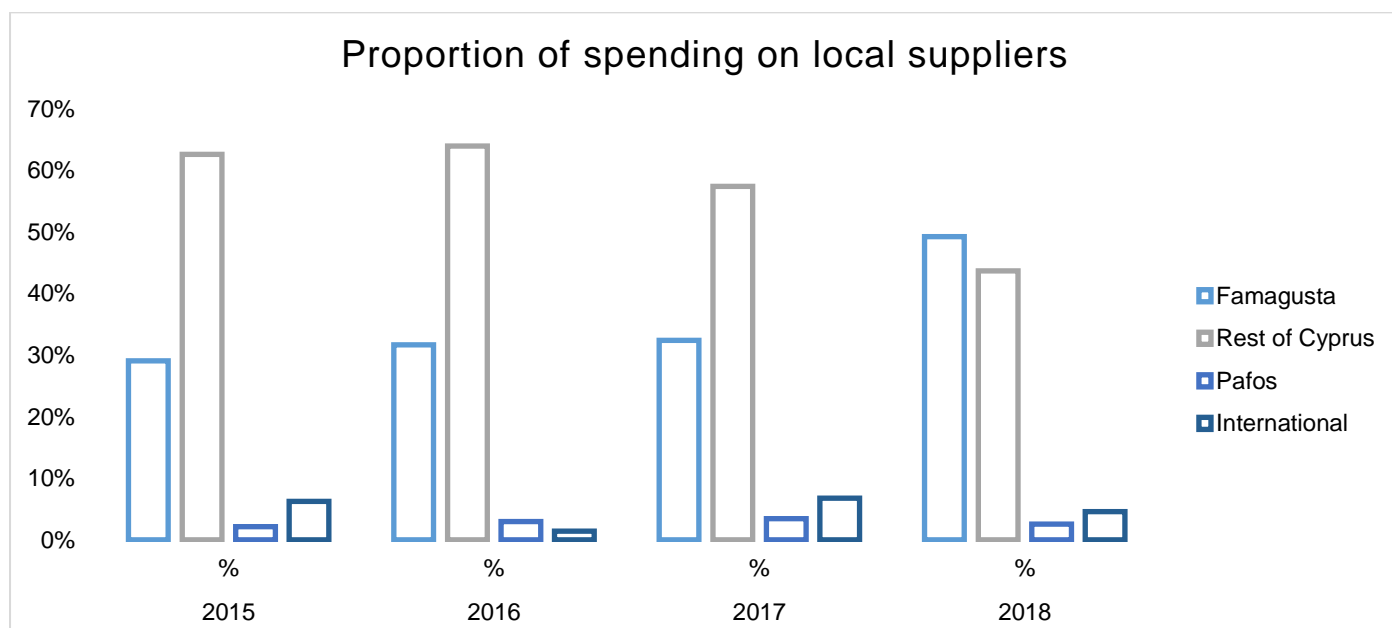
Tsokkos Group contributes in the development of the local communities both in economic and social perspective, especially in Famagusta district, where most of the Tsokkos hotels are located, as well as Tsokkos Group Headquarters. A significant proportion of our employees, subcontractors and suppliers come from the local areas.

3.1.4. Procurement Practices

- Disclosure 204-1: Proportion of spending on local suppliers.

Suppliers are part of the value chain of our Group, providing products and services required for our hotel units operations, including food and beverage, furniture, equipment and corporate services.

Tsokkos Group supports local suppliers who reinforce the quality of our services and contributes to the development and the promotion of the local area. An important proportion of our suppliers is located in Famagusta area, while most of our suppliers are located in Cyprus.



ENVIROMENTAL

A close-up photograph of a hand cupping water, with water droplets falling and splashing. The background is a lush green, out-of-focus foliage. The word "ENVIROMENTAL" is overlaid in white, serif, all-caps font.

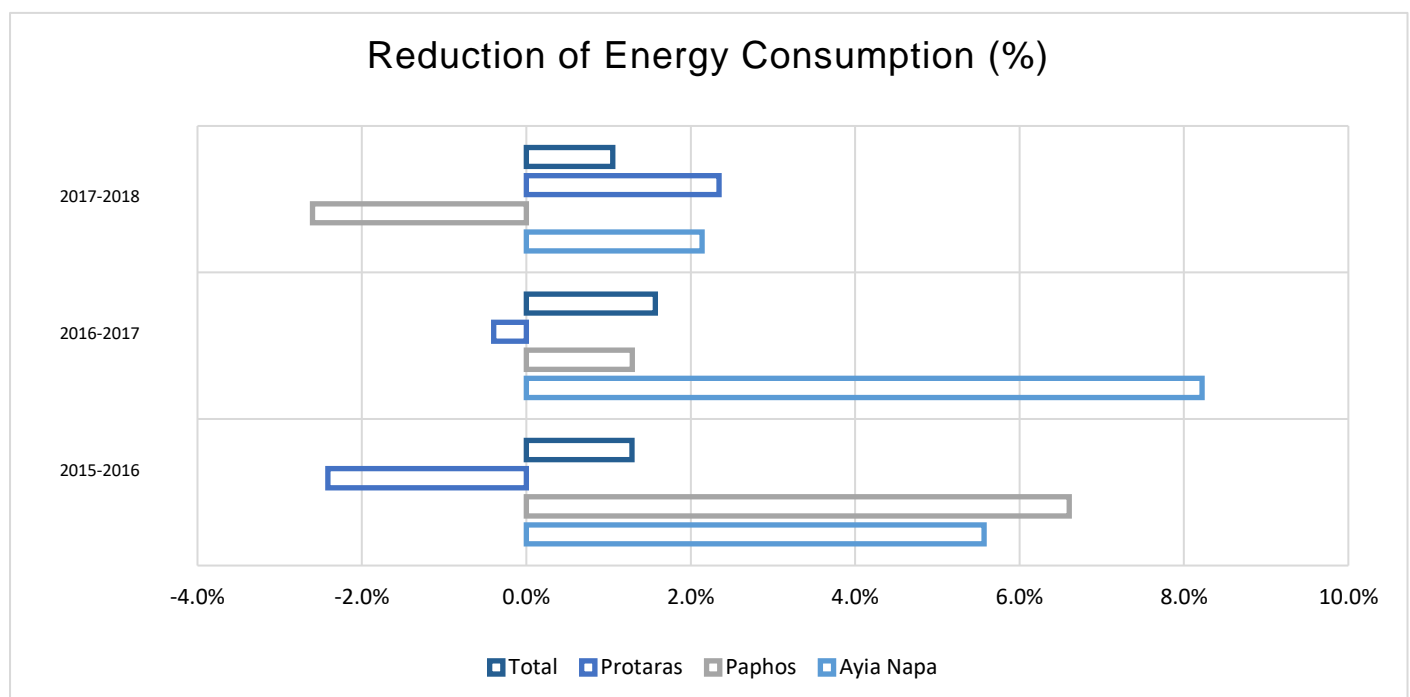
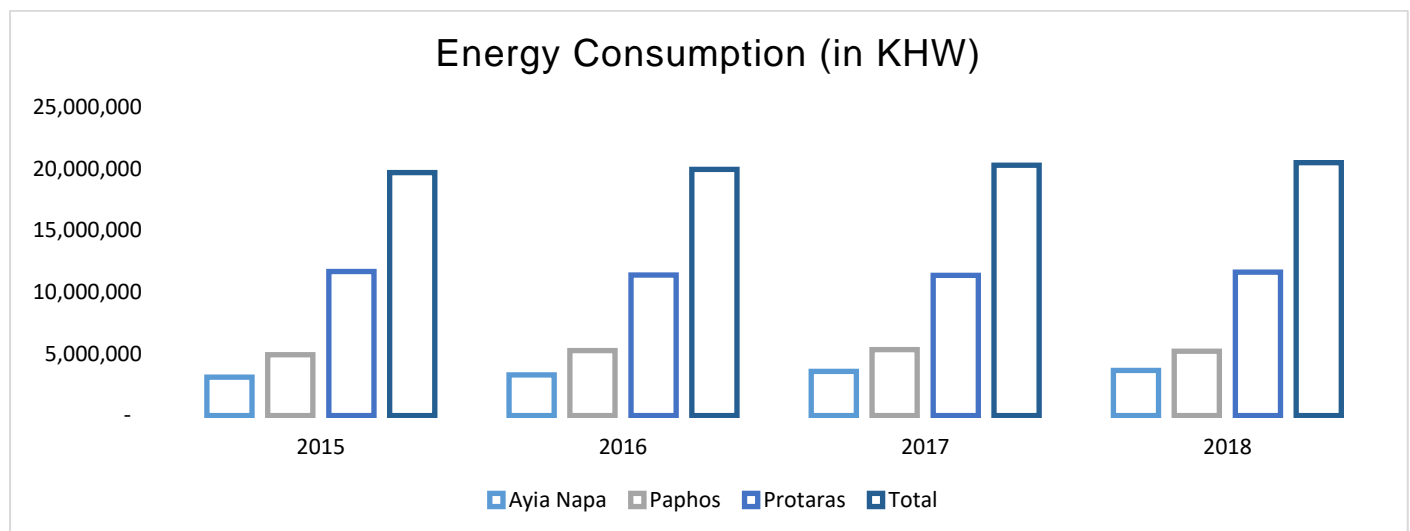
3.1.5. Energy

- Disclosure 302-1: Energy consumption within the organisation.
- Disclosure 302-4: Reduction of energy consumption.

We are committed in reducing our energy consumption and greenhouse gas emissions, increase operational efficiency and do our part to mitigate climate change risks.

Tsokkos Group is in the assessment process for installations of energy saving systems in order to save electricity costs, protect corporate social responsibility and reputation and cut carbon footprint.

Energy consumption is an emerging issue to our Group and we make intensive efforts to measure and mitigate our energy consumption. However, our operations depend on energy consumption at a high extent and an increase in our activities also increases energy consumption.

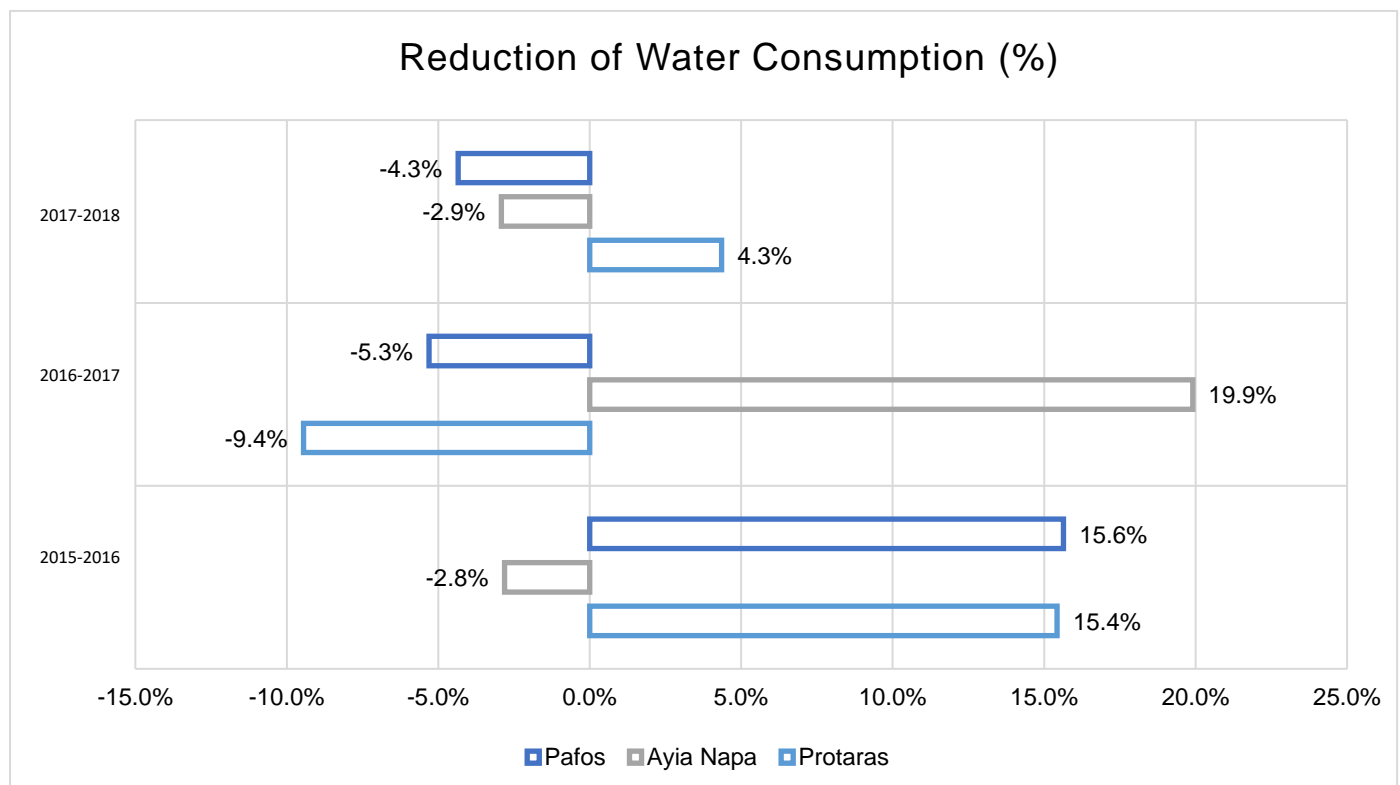
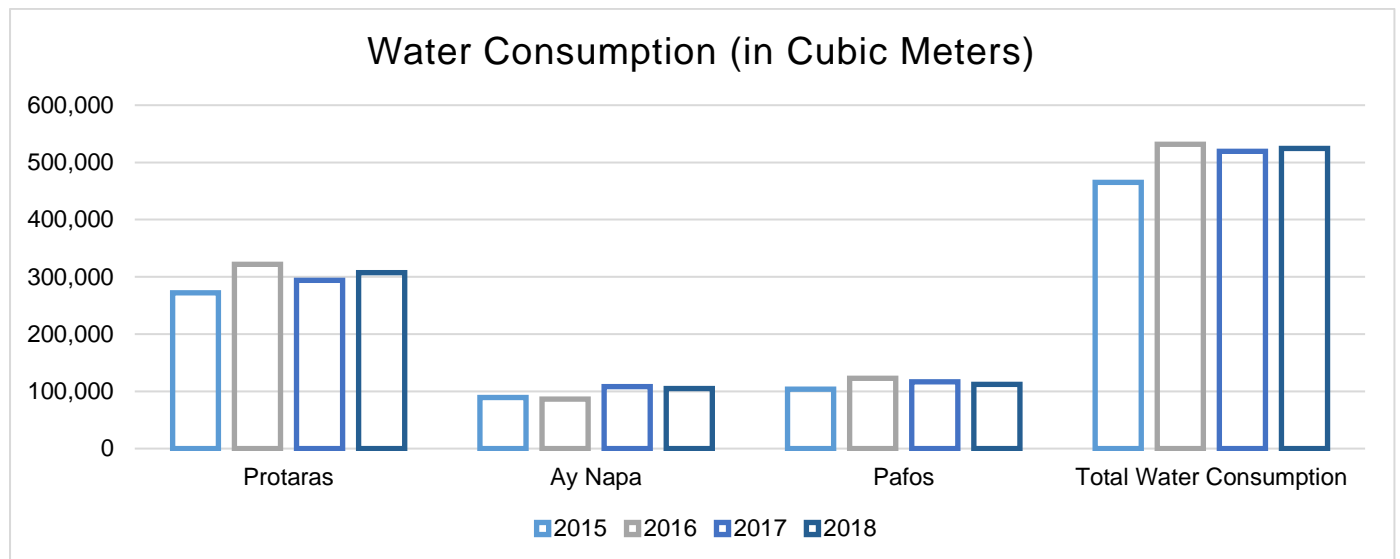


3.1.6. Water

- Disclosure 303-5: Water consumption.

Water is essential to our operations and to the health and prosperity of the communities where we operate. Tsokkos hotels' water consumption is related to swimming pools, laundry programs, dish washing, central plant operations and customers' personal needs.

We are in the assessment process for adopting measures for reducing water consumption, such as water recycling and the establishment of water saving infrastructure and facilities.



SOCIAL

3.1.7. Employment

- Disclosure 401-1: New employee hires and employee turnover.
- Disclosure 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees.

As a service oriented business and employer of more than 2.000 people (permanent and temporary), our employment practices, engagement level and cultural strength are critical to enhancing productivity, enabling guest satisfaction and reducing employee turnover.

At Tsokkos Group, we are focused on being an employer of choice and on providing a world of opportunity to our employees. Due to high seasonality of tourism industry, we have a lot of hires and turnovers each year, especially during our high season from April to October.

New employee hires (Permanent and Temporary)				
	2015	2016	2017	2018
Under 30 years old	990	1.230	1.388	258
Age 31-50 years old	638	817	1.031	1583
Over 50 years old	206	261	353	327
Total number of new employees	1.834	2.308	2.772	2168

Tsokkos Group provides an attractive remuneration package to all employees. Permanent employees are also entitled to provident fund benefits and to provision of health insurance.

3.1.8. Occupational Health and Safety

- Disclosure 403-5: Worker training on occupational health and safety.
- Disclosure 403-9: Work related injuries.

Our aim is to provide a safe and secure environment in order to minimise harms to our employees. We believe that health and productivity are interconnected, and a healthy workforce leads to a healthy lifestyle and wellbeing.

Tsokkos Group adopted a health and safety policy in order to be in compliance with safety regulations. Further, Tsokkos Group provides health insurance coverage to permanent employees as part of their remuneration policy.

Rates of injury and absenteeism comprise indicators for the occupational health and safety. Our Group has a quite low recordable incidence rate and no cases of work related injuries took place during the reported period. The rates of injury are presented in the table below.

	2015	2016	2017	2018
Recordable cases (injury)	18	14	11	12
Recordable incidence rate	1,93%	1,42%		0,95%
Number of fatalities	-	-	-	-
Absenteeism	93	110	55	51
Maternity leave	126	252	252	378

Our Group provides training to employees on occupational health and safety issues on an ongoing basis, with a focus on protection and prevention, emergency response, first aid to workplaces and the use of appropriate equipment. The main training modules provided include training to the lifeguards responsible for the protection of customers using the swimming pools located at the hotel units of our Group.

In accordance to the legislation for swimming pools, annual training sessions are organized since 2016. More specifically, a total of 32 lifeguards employed by Tsokkos Group were trained in 2016, 54 lifeguards in 2017 and 48 in 2018.

Moreover, our Group organises occupational first aid training programs on an annual basis since 2016. More specifically, 82 employees were trained in 2016, 104 employees in 2017 and 78 employees in 2018.

Emergency training programs are also provided to our Group's employees, such as fire, earthquake, etc. More specifically, 120 employees were trained in 2016, 104 employees in 2017 and 154 employees in 2018. In addition, fire safety exercises were conducted for each hotel unit in 2018.

Our Group performs an ongoing review of the relevant legislation and stays informed on any updates or additional requirements. We also have close communication with the Department of Labour Inspection of the Republic of Cyprus and the European Agency for Safety and Health at Work and we apply any required actions in order to comply with the relevant legislation. In this respect, we safeguard the safety and security of our employees and our visitors.

3.1.9. Training and Education

- Disclosure 404-1: Average hours of training per year per employee.
- Disclosure 404-2: Programs for upgrading employee skills and transition assistance programs.

For Tsokkos Group to grow, our employees shall be committed to training for professional development. Training is an essential way to maintain our culture that focuses on associate engagement, participative management and outstanding customer service.

Apart from occupational health and safety training programmes mentioned earlier, training programs provided are mainly related to the topics of leadership, service quality, hospitality and handling of complaints.

To meet the demands of our customers, we need to ensure that employees are educated and qualified. Through skills training programs, we provide employees with opportunities for career and personal development, which contributes to the improvement of the quality of our services and the growth of our Group.

Year	Number of Seminars	Total Seminar Hours	Average Number of Employees	Average Hour per Employee
2015	33	3.696	935	3,95
2016	37	4.144	986	4,20
2017	49	5.488	1.158	4,74
2018	36	5384	1129	4,77

3.1.10. Diversity and Equal Opportunity

- Disclosure 405-2: Ratio of basic salary and remuneration of women to men.

Tsokkos Group's culture includes values of fairness, equality and protection of human rights. Our success begins with our commitment to provide equal opportunities to everyone.

Tsokkos Group's employees consist the most important competitive advantage in providing high quality services. Our target is to attract the best employees regardless of gender, age, religion or nationality.

Ratio of basic salary and remuneration by gender

	Male	Female
2018	59,60%	40,40%
2017	60.2%	39.8%
2016	60.2%	39.8%
2015	61.3%	38.7%

3.1.11. Local Communities

- Disclosure 413-1: Operations with local community engagement, impact assessments, and development programs.

Tsokkos Group has a significant contribution to local communities, by providing job opportunities, reinforcing local suppliers and contributing to the development of local areas both in economic and in social perspective.

We have an active involvement in local communities' development by promoting local areas, organising events and providing support. Our social activity in the local communities includes donations, sponsorships, employment of people from vulnerable groups, providing support to people in need, and organising events volunteering activities.

3.1.12. Customer Health and Safety

- Disclosure 416-1: Assessment of the health and safety impacts of product and service categories.

Tsokkos Group is committed to provide a health and safe environment to customers. Customers' safety is a priority concern to our Group and we aim to provide health and safety to customers during their accommodation in our hotel units.

Tsokkos Group adopted a health and safety policy in order to be in compliance with safety regulations and avoid any harmful situation.

Although no previous incidents of non-compliance exist, our Group remains alarmed in health and safety issues and wishes to provide customers clean and secure atmosphere.

Our hotels are regularly audited by Cyprus Sanitary Services for being in compliance with safety regulations in relation to food and hygiene. Additionally, Tour Operators who contract with our hotels, evaluate the performance of our hotel units in respect of health and safety issues. Our hotels are distinguished by high standards and our priority is to provide high quality services to our customers.

3.1.13. Customer Privacy

- Disclosure 418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data

Customer privacy is a topic of growing importance across our local operations. Tsokkos Group maintains a comprehensive privacy and security program in order to protect the personal information of customers and associates.

Tsokkos Group follows operating guidelines for Group activities that involve the collection, use, disclosure, sharing, retention and security of personal information, including monitoring, alerting and incident response.

Tsokkos Group has not identified any substantiated complaints. Hence, customer privacy is a great concern for our Group and we intend to follow all necessary measures for customer data protection.

At Tsokkos Group we are dedicated to ensuring that our guests, arriving from all parts of the globe, have the most enjoyable and memorable holidays with us. An important part of our commitment is the protection of the personal data you share with us. We take all reasonable steps to ensure that your data is always safe and secure, in accordance with the relevant legislation.

We are committed to your privacy. As part of the values we stand for, we will always consider your fundamental rights as a data subject. We process your personal data for the purposes mentioned above on the lawful basis that:

- The processing is necessary for compliance with a legal obligation to which we are subject.
- The processing is necessary for the performance of an agreement which you have entered into with us and in order to take steps at your request prior to entering into the said agreement(s).
- You have given consent (if and where applicable).
- The processing is necessary for the purposes of the legitimate interests pursued by us.

We apply strict security rules regarding the processing of Personal Data and third parties' access to our records and files. We only share your Personal Data when this is necessary to conduct our business or to fulfill an obligation imposed by law.

4. Appendices

Appendix I: General Disclosures

Organisational Profile

Number	Description	Response	Reference
102-1	Name of the organisation	Section 2.1	
102-2	Activities, brands, products, and services	Section 2.1	
102-3	Location of Headquarters	Section 1.1	
102-4	Location of Operations	Section 2.1	
102-5	Ownership and legal form	Section 2.2.1	
102-6	Markets served	Section 2.1	
102-7	Scale of the organisation	Section 2.2.2	
102-8	Information of employees and other workers	Section 2.2.3	
102-9	Supply chain	Section 2.2.4	
102-10	Significant changes to the organisation and its supply chain	Section 2.2.4	
102-11	Precautionary Principle or approach	Section 2.3	
102-12	External Initiatives	Section 2.3.1	
102-13	Membership of Associations	Section 2.3.1	

Strategy

Number	Description	Response	Reference
102-14	Statement from senior decision-maker	Section 1.2	
102-15	Key impacts, risks, and opportunities	Section 2.3.2	

Ethics and Integrity

Number	Description	Response	Reference
102-16	Values, principles, standards, and norms of behavior	Section 2.4.1	Code of Conduct, 2016
102-17	Mechanisms for advice and concerns about ethics	Section 2.4.2	Code of Conduct, 2016

Governance

Number	Description	Response	Reference
102-18	Governance structure	Section 2.5.1	Annual Report, 2015-2018
102-19	Delegating authority	Section 2.5.2	
102-20	Executive-level responsibility for economic, environmental and social topics	Section 2.5.2	
102-21	Consulting stakeholders on economic, environmental, and social topics	Section 2.5.2	
102-22	Composition of the highest governance body and its committees	Section 2.5.1	
102-23	Chair of the highest governance body	Section 2.5.1	
102-24	Nominating and selecting the highest governance body	Section 2.5.1	
102-25	Conflicts of interest	Section 2.5.3	Code of Conduct, 2016
102-26	Role of highest governance body in setting purpose, values, and strategy	Section 2.5.1	
102-27	Collective knowledge of highest governance body	Section 2.5.1	
102-28	Evaluating the highest governance body's performance	Section 2.5.1	
102-29	Identifying and managing economic, environmental, and social impacts	Section 2.5.2	
102-30	Effectiveness of risk management processes	Section 2.5.1	
102-31	Review of economic, environmental, and social topics	Section 2.5.2	
102-32	Highest governance body's role in sustainability reporting	Section 2.5.1	
102-33	Communicating critical concerns	Section 2.5.4	
102-34	Nature and total number of critical concerns	Section 2.5.7	
102-35	Remuneration policies	Section 2.5.5	
102-36	Process for determining remuneration	Section 2.5.5	
102-37	Stakeholders' involvement in remuneration	Section 2.5.5	
102-38	Annual total compensation ratio	Section 2.5.5	
102-39	Percentage increase in annual total compensation ratio	Section 2.5.5	
102-40	List of stakeholder groups	Section 2.5.6	
102-41	Collective bargaining agreements	Section 2.2.3	
102-42	Identifying and selecting stakeholders	Section 2.5.6	
102-43	Approach to stakeholder engagement	Section 2.5.6	
102-44	Key topics and concerns raised	Section 2.5.7	

Number	Description	Response	Reference
102-45	Entities included in the consolidated financial statements	Section 2.5.8	Annual Report, 2015-2018
102-46	Defining report content and topic Boundaries	Section 2.5.9	
102-47	List of material topics	Section 2.5.10	
102-48	Restatements of information	Section 2.5.11	
102-49	Changes in reporting	Section 2.5.11	
102-50	Reporting period	Section 2.5.11	
102-51	Date of most recent report	Section 2.5.11	
102-52	Reporting cycle	Section 2.5.11	
102-53	Contact point for questions regarding the report	Section 1.1	
102-54	Claims of reporting in accordance with the GRI Standards	Section 1.1	
102-55	GRI content index	Section 4	GRI Standards, 2016

Appendix II: Topic-Specific Disclosures

Number	Disclosure	Description	Response	Reference
201	201-1	Economic Performance	Section 3.1.1	Annual Report, 2015-2018
202	202-2/ 202-3	Market Presence	Section 3.1.2	
203	203-1/ 203-2	Indirect Economic Impacts	Section 3.1.3	
204	204-1	Procurement Practices	Section 3.1.4	
302	302-1/ 302-4	Energy	Section 3.2.1	
303	303-5	Water	Section 3.2.2	
401	401-1/ 401-2	Employment	Section 3.3.1	
403	403-5/ 403-9	Occupational Health and Safety	Section 3.3.2	
404	404-1/ 404-2	Training and Education	Section 3.3.3	
405	405-2	Diversity and Equal opportunity	Section 3.3.4	
413	413-1	Local Communities	Section 3.3.5	
416	416-1	Customer Health and Safety	Section 3.3.6	Code of Conduct, 2016
418	418-1	Customer Privacy	Section 3.3.7	Code of Conduct, 2016