Update 06/2025

Sustainability Policy Hotma srl

Properties:

Best Western Porto Antico

Sublimis Boutique Hotel







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OUR SUSTAINABLE ACTIONS

We are pleased to present our Sustainability Report, a key element of our commitment to sustainable development and corporate transparency. This report, resulting from extensive work and a thorough analysis process, provides a comprehensive overview of our initiatives, performance, and future goals aimed at contributing to a more sustainable world.

Our Commitment to Sustainability

Sustainability is an essential part of our business strategy. We believe that economic growth and social development must align with environmental protection. Therefore, we have adopted a holistic approach that embraces all aspects of our operations, including reducing emissions, promoting the well-being of our employees, and creating a positive social impact in the communities where we operate.

Results and Environmental Performance

One of the main objectives of our report is to evaluate our environmental performance. We have invested in more efficient purchasing processes to reduce our ecological impact. This report documents our progress in reducing greenhouse gas emissions, improving energy efficiency, and responsibly managing water resources. Additionally, we present our strategies for using efficient materials and our commitment to adopting circular economy models, which form the foundation of our long-term development vision.

Social Responsibility and Impact on Communities

Sustainability extends beyond the environmental aspect; we are keenly aware of our social responsibilities. Through this report, we aim to emphasize our commitment to improving working conditions, promoting diversity and inclusion, and actively supporting local communities, including education and training initiatives in the areas where we operate.

Governance and Transparency

A crucial aspect of our sustainability strategy is governance. We believe that transparency and integrity are essential for building trusting relationships with all our stakeholders. This report includes a detailed analysis of our decision-making processes, the governance policies we have adopted, and the control measures implemented to ensure compliance with the highest ethical and regulatory standards.

Future Goals and Long-Term Vision

As we look ahead, we recognize that the journey towards sustainability is continuously evolving, requiring ongoing adaptation and innovation. This report not only highlights the progress we have made but also outlines our future commitments. We have set ambitious goals for the coming years, which include improving emissions, expanding our social initiatives, and enhancing our circular economy practices.

While we are proud of the achievements so far, we understand that there is still much work to be done. We encourage all our stakeholders to read this report carefully and to continue supporting us on our sustainability journey. It is only through collaboration and shared commitment that we can achieve our improvement goals and create a lasting positive impact for future generations.

Thank	you for placing v	our trust in us a	and for vour	continued	support of	our sustainabilit	v initiatives.

Best regards,

Hotma srl Ownership

Gianfranco Castagnetti

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GSTC Committee

Angela Bova - HR Manager

Christian Casella - Resident Manager Sublimis Boutique Hotel

Carlo Torrigino - Resident Manager BW Hotel Porto Antico



OUR CHOICE

We have decided to pursue greater sustainability by adhering to the international standards set by the Global Sustainable Tourism Council (GSTC). This initiative encourages us to assess the sustainability of our operations not only from an environmental perspective but also in terms of management, social impact, economic viability, and cultural significance.

Our choice to align with GSTC is driven by its recognition as a global standard. The benchmarks we are committed to meeting through our actions are consistent worldwide. Additionally, this certification comes from "third-party" organizations.

Third-party certification involves assessment and verification of an organization or product by an independent entity that is external to the company or individual seeking certification. This third party ensures that specific requirements are met, providing impartial assurance regarding the quality, compliance, and safety of the product, service, or system being evaluated.

In summary, third-party certification serves as a globally recognized seal of quality and compliance, offering both consumers and businesses a reliable guarantee of the credibility and seriousness of what is being certified.

It is precisely these principles that led us to choose GSTC, as we aim to ensure transparency and integrity in our work for our collaborators, guests, customers, suppliers, stakeholders, and the broader community and institutions.

OUR PROPERTIES

Best Western Hotel Porto Antico

Nestled in the heart of the historic centre of Genoa, the Best Western Hotel Porto Antico is a charming three-star hotel inside an ancient medieval building. Inspired by the city's rich maritime heritage, the hotel features fifty comfortable and welcoming rooms that immerse themselves in the shades of red and white of its design.

Guests can easily explore the major attractions within walking distance, immersing themselves in the Renaissance atmosphere and discovering quaint artisan shops. At the end of the day, enjoy a leisurely stroll along the waterfront of Porto Antico, where the silhouettes of lights reflect in the sea, with the iconic "Lanterna della Superba" serving as a beautiful backdrop.

Whether traveling solo, as a couple, or with family, all guests will find a warm welcome and tailored services that cater to their preferences and needs.

The services offered: overnight stay, breakfast and fitness area.

The first major renovation dates to 2008 which returns the image visible even today. With the succession of years, the care and constant attention to detail and continuous small updates have allowed Best Western Hotel Porto Antico to become a point of reference for hospitality in the heart of Historic Genoa.

Sublimis Boutique Hotel

Sublimis Boutique Hotel is located in the heart of Camogli, one of the most beautiful villages on the Ligurian Riviera. Renowned for its pastel-coloured buildings, charming staircases, and narrow alleys, Camogli provides a picturesque backdrop for this typical 19th-century Ligurian villa that overlooks the stunning sea of Golfo Paradiso.

The hotel underwent an elegant renovation in 2020, highlighting the villa's original identity through meticulous attention to detail in its furnishings and materials.

At Sublimis, guests can truly experience the soul and magic of the village while being lulled by the gentle sound of waves from the enchanting Ligurian Sea, visible from the 21 airy and elegant rooms. Each room is adorned with high-quality furnishings and carefully selected details, ensuring that every stay is memorable.

Sublimis Boutique Hotel is designed for guests seeking tranquillity and relaxation. To provide a truly sublime experience, the hotel welcomes visitors aged 16 and older.

The services offered include bed and breakfast, a cafeteria and lounge bar, and gourmet dining (Ladidà Sur La Mer Restaurant).

OUR TERRITORY

Genoa La Superba

Genoa, an ancient Roman and Carolingian city, was the Maritime Republic and Queen of the Tyrrhenian Sea until, with the fall of Constantinople under the Turks (1453), a flourishing colonial period ended. It regained its autonomy under the aristocratic government of Andrea Doria, who occupied it on behalf of Spain, guaranteeing the city a regime of total independence which it maintained, albeit with ups and downs, until its annexation to the Savoy dominion in the 19th century.

Genoa has the largest historic centre in Europe, with its narrow but charming "caruggi", a labyrinth of typical narrow streets that restore the soul of the ancient city.





Camogli on the Ligurian Riviera

Typical seaside village, a few kilometres from the city of Genoa, a tourist centre known for its marina and colourful buildings on the seafront. It is also historically called the "city of a thousand white sailing ships".

Camogli contains a wonderful variety of atmospheres that blend the blue of the sea, the warm shades of the sunsets and the pastel colours of the houses.

A seaside village of a thousand riches, where landscape, nature, taste and tradition intertwine. Every time it is a discovery, a different experience, a symphony to listen to at the rhythm you love.

OUR COMMITMENT

People at the centre

Our commitment to the local community includes hiring local staff, which helps keep the community thriving. Our collaborators are our most valuable resource for ensuring a high-quality experience, and thus, we invest in their training.

We provide resources and training programs tailored to meet development needs at all levels and across all organizational functions. Additionally, we engage a safety consultant who plans training sessions focused on health, safety, and hygiene.

Our training offerings include:

- Management training for office, accommodation, and restaurant managers
- Monthly individual coaching with an ICF-certified coach for all office, accommodation, and restaurant managers
- Courses on product, service, and compliance in the hotel sector, available in synchronous and asynchronous modes, both online and in-person (via the BW e-learning platform and BW training events)
- Mandatory occupational health and safety training, including HACCP
- An Excel community of practice with monthly meetings open to all employees

We aim to promote work as a source of social recognition, dignity, and individual fulfilment, encouraging passionate participation in our business project. This serves as a key factor for development and enrichment for Hotma in the following ways:

1. Growth Opportunities: We provide a stimulating work environment where employees feel free to express their abilities and invest in themselves, fostering a passion for hospitality.

Creating a safe, respectful, and peaceful working environment is essential to guarantee the satisfaction of both employees and our guests. Since 2022, the company has implemented an additional welfare program for employees, which includes an annual benefit determined by the department, position, and weekly hours worked.

Employees can use their welfare credits to access shopping vouchers, fuel vouchers, e-commerce gift cards, mortgage and loan reimbursements, childcare and caregiving services, travel and leisure opportunities, supplementary healthcare services, education, training, and contributions to supplementary pension plans.

- 2. Equality and Equity: We ensure equal treatment and equity at all organizational levels through inclusive practices and policies that value human resources. We strictly comply with national labour laws, guaranteeing training and advancement opportunities.
- 3. Living Wage: We have documented the definition of a living wage appropriate to our territory and ensure all employees earn above this standard.

In 2023, Hotma committed to renewing, updating, and creating standardized business procedures that promote fair, transparent, and functional resource management to address the needs of both the company and its employees.

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Specifically, the following procedures have been implemented:

- F&B Hotel.0001 Schedule and Shift Planning
- Offices.0001 Holiday and Leave Planning
- HR Recruitment.0001
- HR Onboarding.0002

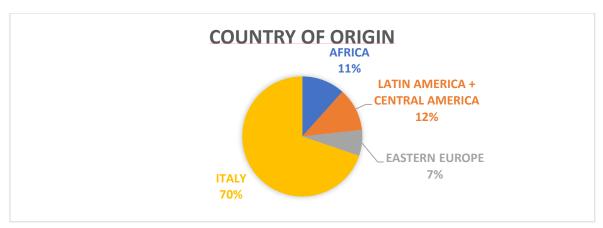
Moreover, the company supports internal career development by providing guidance and training for employees to help them build their career paths, ensuring their employability and job security.

Our group condemns all forms of exploitation, harassment, and discrimination based on gender, ethnicity, religion, or disability. We maintain a code of ethics, which is accessible at various locations within our hotels:

https://www.hotelportoantico.it/ospitalita-responsabile https://www.hotelsublimiscamogli.it/ospitalita-responsabile

The company in numbers

Average company headcount: 43 pp

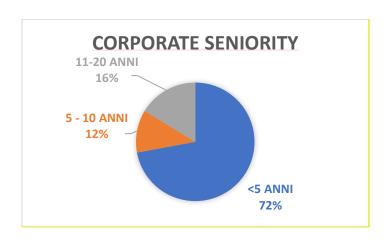




GENERAZIONE	N.ro	%
BABY BOOMERS	3	7%
GENERAZIONE X	16	37%
GENERAZIONE Y	16	37%
GENERAZIONE Z	8	19%

Average age: approximately 40

GENDER	POPULATION	%
F	24	56%
М	19	44%



Our actions for sustainability



Cultural and Social Support for the Community

The historical and cultural heritage of Genoa and Camogli enhances the value of the territory, and it is essential to protect and promote it. Our commitment to local culture manifests through our support for various bodies and associations. For instance, we collaborate with A Compagna, the oldest historical-cultural association in the Ligurian capital, and the Franzoni Foundation, which was established in Genoa in 2001. The Foundation aims to promote and enhance the region's historical and artistic heritage, as well as its bibliographic and archival resources, while fostering culture and the arts.

We also contribute to significant cultural events, such as the literary event "Parole e Voci," held annually in Camogli. In 2024, Camogli will serve as the location for the initial press conference associated with this event. Additionally, we are involved in the GEF Competition – World Festival of Creativity in Schools, edition 2024.

Our facilities display photographic and tangible evidence of the history and culture of both Genoa and Camogli. We strive to generate a positive impact on the local community by supporting culture and preserving the beauty of artistic sites. We promote "benevolent tourism," which creates opportunities for cultural enrichment for visitors while utilizing resources provided by local institutions, including the official Visit Genoa website of the Municipality of Genoa. This website offers guests insights into the territory's history and traditions in cultural, artistic, artisanal, culinary, and entrepreneurial contexts.

Moreover, we recognize our place within the community and are committed to supporting its members. This support includes small contributions such as donations for the Christmas lighting in the "Piazza Caricamento/Fossatello" area, contributions to the Music for Peace Solidarity Project, and assistance to the San Fortunato Association for the bonfires preceding the important Camogli Fish Festival. We also offer work grants in collaboration with the Municipality and establish agreements with private training organizations.



Local and Solidarity Supply Chain

We are committed to promoting a virtuous mechanism that enables us to offer the best products while supporting local producers and fostering short supply chains. We work in synergy with other stakeholders to achieve this goal.

To prioritize local suppliers and products, we have established procedures that emphasize specific criteria for our supplies. Our aim is to avoid waste through effective warehouse management policies, support the local economy, and preserve culinary traditions. Our cooking techniques and menu selections are designed to minimize waste.

Examples of local products used in our facilities include cheeses, cured meats, focaccia, baked goods, and fish from the Gulf of Genoa. We also incorporate various organic products, such as jams, butter, rusks, and fair-trade items, including teas and other Rainforest and BRC-certified products. Among our traditional dishes are the renowned "Trenette al Pesto," and our talented chefs can prepare a variety of vegetarian and vegan dishes upon request.

We collaborate with local companies, such as Caseificio Val D'Aveto, Salumificio Sant'Olcese, Cose Buone, Camogli Pesca, and Orticello di Sori. Our future commitment is to further enhance the local supply chain, celebrating regional flavours and supporting local entrepreneurship.

Eco-Friendly and Efficient Purchasing

Our objectives are to:

- Reduce environmental impacts by utilizing resources efficiently and consciously, with a goal of progressively lowering consumption.
- Work in collaboration with other stakeholders to promote sustainable policies and practices that create virtuous cycles within the supply chain.

Our group has adopted guidelines and procedures to ensure continuous improvement in selecting our suppliers and products whenever applicable.

Some examples of our practices:

Preference for Recycled and Recyclable Materials

We utilize recycled FSC-certified paper and choose products that come in easily recyclable or compostable packaging.

Environmental Certifications

The majority of our room-cleaning products are Ecolabel certified, and we seek out natural-based products for room amenities. Many of our food products also carry BIO-Rainforest and BRC certifications.

Suppliers

Our primary suppliers hold certifications that demonstrate their compliance with environmental and social regulations, including those related to worker safety and corporate social responsibility. We have implemented a rating system to monitor the performance of our suppliers.

Reduction of Packaging

We prioritize products that use minimal packaging or that utilize reusable, recycled, or compostable materials, such as toilet paper and hygiene products. Additionally, we opt for items that offer refill or reuse options, which helps reduce our reliance on disposable packaging. Examples include hand soap and shower gel dispensers as well as breakfast products.

Purchasing in Volume

Whenever possible, we purchase in bulk to decrease the number of deliveries and minimize the environmental impact associated with transportation.

We also participate in cooperatives or purchasing groups, such as the Besteam purchasing centre, which enables us to obtain ecological products at a lower cost through collective buying.

Ecological and efficient purchasing, along with short supply chains, are essential components of our overall sustainability strategy.



Energy Saving and Clean Energy Initiatives

- We purchase 100% of our energy from renewable sources.
- When purchasing equipment such as minibars and hairdryers, we consider their energy consumption.
- All lighting is provided by low-consumption LED lamps.
- We utilize a home automation system to manage entrances, lighting, and the climate in rooms and common areas.
- We have implemented awareness-raising communications for both employees and guests, such as signs reminding everyone to turn off the lights, and we have replaced lighting in warehouses with timed systems wherever possible.

Emissions Reduction Efforts

We monitor our greenhouse gas emissions using the HCMI tool. In 2024, our emissions were 2.73 kg per guest and 1.85 kg at Sublimis Boutique Hotel. We are committed to implementing actions aimed at reducing these emissions, which include:

- Reducing waste
- Increasing the use of green energy

Looking forward, we plan to explore compensation activities to better understand how to diminish our environmental impact, while also promoting behaviours that encourage energy conservation.

Sustainable Mobility

Our area promotes the use of public transport due to its layout. We encourage our guests to consider taking the train instead of driving and provide this information in our pre-stay correspondence and on our website.

In our internal communications, we recommend using public transport and alternative modes of travel to navigate the city. The train stations are located 1 km from Piazza Principe and Porto Antico, which can be easily explored on foot. Guests can reach the Porto Antico hotel in just a few minutes from Principe station by metro, with only 2 stops, and the hotel is 150 meters from the metro exit.

We have partnered with SEI FUORI for electric bike rentals available in both Best Western Hotel Porto Antico and Sublimis Boutique Hotel. The AMT City Pass offers discounted rates for travel within Genoa. Additionally, there are charging stations for electric cars at Sublimis Boutique Hotel, and further charging options can be found at the Marina Parking, located 100 meters from the Best Western Hotel Porto Antico.

Waste Reduction

We actively monitor the waste generated by our facility and implement measures to reduce it, including:

- Efficient purchasing practices
- Minimizing waste by donating leftover baked goods and pastries to our staff and participating in the Too Good To Go platform at both Best Western Hotel Porto Antico and Sublimis Boutique Hotel
- Promoting recycling through a series of internal communication tools aimed at raising guest awareness; we provide special bins in corridors and common areas for separate waste collection

Light and Noise Pollution

We comply fully with all legal regulations regarding light and noise pollution.

Water Saving

We have assessed the hydrogeological risk in our area, which is considered medium. The climate crisis is increasingly affecting water availability, so we are committed to reducing consumption through awareness-raising activities for both our staff and guests. Additionally, we have implemented the following measures:

- Our taps use less than 6 litres per minute, while our showerheads use less than 10 litres per minute.
- We have installed dual flush toilets and water flow reducers.
- We utilize drip irrigation and automatic systems in our green areas.
- Towels and sheets are changed only upon request.
- We purchase eco-friendly detergents from We-Italia's Green Line, all of which have Ecolabel certification to minimize the use of environmentally harmful substances.

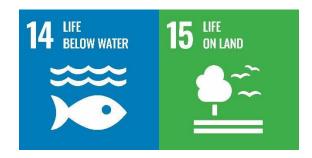
These actions reflect our commitment to sustainability and responsible water usage.



Conservation of Biodiversity, Ecosystems, and Landscapes

We are committed to caring for our territory and respecting the flora and fauna that call it home. Here are some of our initiatives:

- We promote guidelines for visiting natural sites in our destination, collaborating with the guides of the Municipality of Genoa, the Liguria Via Mare Consortium, and Sublimis. We utilize local guides who are regularly qualified for their profession, as well as local services such as boat rentals.
- At the Sublimis Boutique Hotel, we have established a small area dedicated to endemic herbs.
- We manage and care for a centuries-old Maritime Pine in Camogli, which has become a symbol of the town.
- We offer support through overnight stays at the Genoa Aquarium during specific events aimed at protecting biodiversity.
- We pay special attention to our guests' pets with our Pet Package.



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CONCLUSIONS

Our commitment to sustainability is not just a responsible choice; it is an essential necessity for building a better future for both current and future generations. Through our initiatives, sustainability has become a fundamental pillar of our identity, integrating into every aspect of our operations.

However, our journey doesn't stop here. Every step forward, every innovation, and every improvement brings us closer to a greater goal: a world where economic growth, social well-being, and environmental protection work in harmony.

We look to the future with determination, aware that many challenges remain. Nevertheless, we are convinced that our passion, creativity, and sense of responsibility will guide us toward increasingly effective solutions. Every action counts.

At Hotma Hotels, we recognize that if these actions are implemented on a large scale, they can significantly reduce our ecological footprint and promote more sustainable development.

We aim to involve as many stakeholders as possible, creating a collective effort that focuses on issues vital to our well-being and that of future generations. We understand that these may be small steps, but just as seas are made up of countless small drops, it is the strength of our collective action that makes a difference. We believe in this.

Our journey toward continuous improvement has just begun. We will persist in our efforts, knowing that each step we take translates into a concrete positive impact.

The future is in our hands, and together, we can make it sustainable, fair, and prosperous for all.