

THE KINGSBURY PLC

ENERGY & EMISSION MANAGEMENT POLICY

The Kingsbury PLC is deeply committed towards conducting business in an environmentally responsible manner.

The Energy and Emission Management Policy has been formulated to ensure all our business operations align to a consistent set of guidelines on environmental stewardship (responsible use and protection of natural resources through conservation and sustainable practices).

We operate within the framework of an Energy and Emission Management that is aimed towards minimizing adverse environmental impacts caused by natural resource depletion and greenhouse gas emissions. This framework encourages the optimization of energy usage by driving increased energy efficiency and increasing reliance on clean energy sources.

The Kingsbury PLC is setting up the ESG strategy focusing on energy & emission management which will be driven based on specific targets & KPIs as integral part of this framework.

1. SCOPE

This policy is applicable for all business locations and relevant service providers of The Kingsbury PLC.

2. OUR COMMITMENT

As an environmentally responsible organization, The Kingsbury PLC is committed to the following energy and emission management programs.

Compliance with all relevant laws and guidelines, national and international standards and all other requirements on energy & emission management practices (Sustainable energy Authority / Sustainable Development Goals / UNGC / Responsible Care Council etc.)	Compliance
Identifying and appointing competent teams to effectively implement energy and emission management programs aligned with the operating model and business requirements of each operating location.	Assign competent teams
Ensuring 100% complete and accurate reporting of relevant energy and emission data to The Kingsbury and Hayleys Group Sustainability on a timely basis following the set reporting frameworks based on GHG protocol and national guidelines and Hayleys' Cube reporting formats.	Accurate and timely reporting
Implementation of customised energy and emission management programs focusing on the materiality of relevant energy / emission aspects. In driving these programs, identify all energy and emission related processes and applications, evaluate the significance, set targets and objectives, continuously monitor performance and drive the program based on defined KPIs.	Implement holistic energy and emission management programmes at all entities

Ensure the availability of relevant information, documents, training tools and guidance to drive the defined energy and emission management programs	Availability of resources
Checking feasibility, gradually shift from non-renewable energy sources and increase reliance on renewable energy such as solar, wind, biogas etc. Ensure that purchased biofuels are sustainably sourced and does not result in deforestation.	Shift to renewable energy
Minimizing energy related environmental impact and enhance the business sector competitiveness through energy costs savings by embracing application of Life Cycle Assessment (LCA) concept, carbon neutral operations and many other recognized green concepts.	Minimise energy related impact on environment
Adopting energy and emission conscious procurement procedure on all relevant operations and propagate our energy and emission management practices across supply chain. Effective operation and maintenance programs to ensure energy efficient operations while minimizing emissions for significant energy consuming applications (machines / processes)	Energy and emission management
Nurturing culture of energy and emission consciousness across all the relevant stakeholder groups (e.g. employees, customers, communities, non-profit organizations, government etc.) and the organization should observe the energy management practices of its supply chain partners and encourage the use of clean energy across its supply chain	Energy and emission conscious cultures
Aligning with the Hayleys Group Sustainability strategy	Align to Group

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

3. RESPONSIBILITY

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to.



THE KINGSBURY PLC

WATER MANAGEMENT POLICY

The Kingsbury PLC Water Management Policy seeks to conserve and optimize water obtained from various sources, seek avenues of recycling and reusing wastewater and responsible disposal of wastewater generations in its operations.

Environmental and social aspects of water management have been adequately addressed through this policy.

We are setting up the ESG strategies focusing on water & wastewater management which will be driven based on specific targets and KPIs as integral part of this framework

1. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

2. COMMITMENT

As the issue of water scarcity gains global attention, water conservation has been identified as a key priority in the organization’s environmental agenda. Following are the key aspects relating to the ESG framework over water applications:

Compliance with all relevant laws and guidelines, national and international standards and all other requirements on water management	Compliance
Implementation of a water management strategy aligning with the CEO’s water mandate by UNGC (six elements of the mandate – Direct Operations, Supply Chain and Watershed Management, Collective Action, Public Policy, Community Engagement, Transparency – through individual and collective efforts) and all other relevant requirements	Implement water management strategy
Identify, clearly map and measure all water inputs (classified by source), water applications, water distribution plans and wastewater generation within the defined boundaries	Mapping of water sources, applications, distribution and wastewater generation
Identifying and appointing competent teams to effectively implement water management program aligned with the operating model and business requirements	Identify and assign individual and functional roles and responsibilities
Ensuring the 100% complete and accurate reporting of all relevant data on timely basis to The Kingsbury and Hayleys Group Sustainability (Metering should be available for main water inputs and wastewater outputs. Furthermore, it is recommended that sub metering processes be established based on the level of water consumption and wastewater generation)	Accurate and timely reporting with reliable metering at source

Water management targets and objectives should be set and continuous improvement program should be driven (focusing on monitoring, corrective and preventing actions, auditing and reviews on water management)	Set water management targets and objectives
Ensure the availability of relevant information, documents, training tools and guidance to drive the defined water management programs	Availability of resources
Introducing sustainable sourcing of water (including rainwater harvesting), water reusing opportunities, recycling practices and any other innovative solutions aimed at minimising the water footprint of the organization	Sustainable sourcing, reuse, recycling of water and innovation to minimize consumption
Ensure the appropriate and adequate treatment of raw water inputs and wastewater discharge to ensure it meets the quality parameters for its designated usages and discharge standards (prior to discharge into the environment or further treatments)	Water quality controls
Properly track and manage all the waste water discharges and locations with quantity and quality while ensuring the environmental compliance.	Manage discharge of wastewater
Effective operation and maintenance programs to ensure water efficiency of all the relevant operations	Water efficiency
Foster a water-conscious culture focusing on conserving and reducing water utilisation through various technologies, process improvements and through stimulating behavioral changes in staff through awareness campaigns	Water conscious culture
Driving corporate responsibility programs focusing on water management applications	Water management related CSR activities
Aligning with the Hayleys Group Sustainability strategy	Align to Group

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

3. RESPONSIBILITY

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THE KINGSBURY PLC

MATERIAL AND WASTE MANAGEMENT POLICY

1. STANDARD

As an environmentally responsible corporate, The Kingsbury PLC places priority on optimizing and managing material consumptions through best business applications while minimizing waste generation and effectively managing the waste generated through sustainable disposal methods. This guideline will ensure the implementation of effective material and waste management practices across all departments irrespective of their operations.

We are setting up the ESG strategy focusing on management of materials and waste generation which will be driven based on specific targets & KPIs as integral part of this framework.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

This policy relates to all types of materials (that are used to produce and package the primary products and services) and relevant solid waste generated through our operations. The following guidelines are aimed towards the implementation of sustainable material and waste management practices across The Kingsbury PLC.

Overall: Materials & Waste	
Compliance with all relevant laws and guidelines, national and international standards and all other requirements on material and waste management	Compliance
Ensuring 100% complete and accurate reporting of all relevant material and waste generation data on a timely basis to The Kingsbury and Hayleys Group Sustainability	Accurate and timely reporting
Identifying and appointing competent teams to effectively implement material and waste management programs aligned with the operating model and business requirements	Identify and assign individual and functional roles and responsibilities
Promoting waste management through identified corporate responsibility programs	Waste management-related CSR activities
Establishing proper environmental grievance handling mechanism to handle all possible environmental and social issues from stakeholders	Environmental grievance handling mechanism
Aligning with the Hayleys Group Sustainability strategy	Align with Group Sustainability strategy

Introducing possible waste minimization practices while improving resource efficiencies through application of LCA concepts, innovation & technology applications and applications of any other material and waste management related concepts	Innovation to drive resource efficiency
Overall: Materials & Waste	
Compliance with all relevant laws and guidelines, national and international standards and all other requirements on material and waste management	Compliance
Ensuring 100% complete and accurate reporting of all relevant material and waste generation data on a timely basis to The Kingsbury and Hayleys Group Sustainability	Accurate and timely reporting
Identifying and appointing competent teams to effectively implement material and waste management programs aligned with the operating model and business requirements	Identify and assign individual and functional roles and responsibilities
Promoting waste management through identified corporate responsibility programs	Waste management-related CSR activities
Establishing proper environmental grievance handling mechanism to handle all possible environmental and social issues from stakeholders	Environmental grievance handling mechanism
Aligning with the Hayleys Group Sustainability strategy	Align with Group Sustainability strategy
Introducing possible waste minimization practices while improving resource efficiencies through application of LCA concepts, innovation & technology applications and applications of any other material and waste management related concepts	Innovation to drive resource efficiency

Materials	
Establish a comprehensive system to capture all quantitative information pertaining to renewable and non-renewable material consumptions relevant to the organisation's operations (raw material/ associate process materials / packaging materials etc.)	Capture quantitative information in sufficient detail
Establish a material management program to prioritise sustainable material sourcing while increasing the use of recycled and reclaimed material inputs where ever possible	Prioritise sustainable sourcing
Sustainable material sourcing, green procurement practices, sustainable supplier evaluations and safe material handling should be practiced across the business sector.	Comprehensive sustainable sourcing practices to be adopted by Group

Waste	
Defining the solid / semi solid waste categories within operating boundaries, map them accordingly and implementing mechanisms to quantify waste generation	Quantifying waste generation by appropriate categories
Establishing waste management programs focusing on minimising, reducing and controlling waste generation. (Program should be developed based on 7R [Reject, Reduce, Reuse, Reclaim, Replace, Repair, Recycle] concept applications over significant operations identified)	Waste management programmes based on the 7R concept for significant applications
Proper segregation practices should be implemented across all the categories of waste generation (process and non-process)	Segregation of waste
Ensure the sustainable disposal of all types of waste by following “zero landfilling” (getting into agreements with legally accepted waste collectors and disposers, ensure the proper disposal through waste collector evaluations, maintain records of all the waste disposals)	Sustainable disposal of waste
Establishing material and waste management targets, objectives and drive continuous improvement programs (focusing on monitoring, corrective and preventing actions, evaluations and reviews on waste management)	Establishing targets and objectives to drive continuous improvement
Ensure the availability of relevant information, documents, training tools and guidance to drive the defined waste management programs	Training and tools to enable performance

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

4. RESPONSIBILITY

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to.



THE KINGSBURY PLC

CHEMICAL MANAGEMENT POLICY

1. STANDARD

As an environmentally responsible corporate, The Kingsbury PLC places priority on sustainable chemical management practices ensuring the safety of our employees, customers and all other relevant stakeholders while minimizing and eliminating the environmental negative impacts. This guideline will ensure the implementation of effective chemical management practices across all the operating locations irrespective of their operations.

The Kingsbury PLC is setting up the ESG strategy focusing on sustainable chemical management practices which will be driven based on specific targets & KPIs on integral part of this framework.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC. This will ensure the best chemical management practices from chemical purchasing, chemical handling and storing to chemical disposals.

3. COMMITMENT

This policy relates to all types of chemical applications (e.g. cleaning chemicals / engineering chemicals / laundry chemicals) within our operations as Leisure sector. The following guidelines are aimed towards the implementation of sustainable chemical management practices across The Kingsbury PLC.

Compliance with all relevant laws and guidelines, national and international standards and all other requirements on chemical management	Compliance
Identifying and appointing competent teams to effectively implement sustainable chemical management programs aligned with the operating model and business requirements of the Leisure sector	Identify and assign individual and functional roles and responsibilities
Maintaining up to date complete and accurate chemical inventory for all relevant chemicals. At a minimum, the basic information of each chemical should be included in the inventory.	Maintaining an inventory of information
Aligning with the chemical inventory, maintain up to date (maximum 3 years old) MSDS (Material Safety Data Sheet) / SDS (Safety Data Sheet) for all the list of chemicals. MSDS should be available with the organization safety officers and / or appointed representative for chemical management	Maintaining material safety data sheets
Chemicals should be stored separately complying with all the relevant legal and other requirements (following the chemical storing compatibility guidelines to ensure the environmental and occupational safety)	Storage of chemicals

Adequate spill control mechanism and safety precautions should be available for any emergencies relating to chemical related operations	Safety precautions
Availability of a training and awareness plan to ensure the safe and environmentally sustainable chemical management for all the relevant employees and any other stakeholder groups	Training and awareness
Continually conducting projects for improving the efficiencies of related operations with the intention of minimizing the overall chemical consumptions	Efficiency improvements
Extending the best chemical management practices to the relevant supply chains partners	Supply chain practices
Establishing a proper environmental grievance handling mechanism to handle all possible environmental and social issues relating to chemical management	Grievance mechanisms
Aligning with the Hayleys Group Sustainability strategy	Alignment with Group Strategy

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4. RESPONSIBILITY

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THE KINGSBURY PLC

BIODIVERSITY CONSERVATION POLICY

1. STANDARD

As a hospitality service provider operating in various ecosystems, The Kingsbury PLC is deeply committed to preserving biodiversity and natural habitats. We are mainstreaming the concept of biodiversity across value chains and adopting the regenerative & precautionary approach for sustainable management of biodiversity in all decision-making processes. Diversity of ecosystems, species and genes and the ecological processes that support them are prevalent in and around The Kingsbury business operations.

The Kingsbury PLC is setting up the ESG strategy focusing on biodiversity conservation which will be driven based on specific targets & KPIs on integral part of this framework.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

We seek to avoid and minimize any significant impacts our operations may have on sensitive species, habitats and ecosystems. This means that we;

Ensure legal compliance with respect to biodiversity by complying with rules and regulations related to all environmental aspects (e.g. forest, wildlife, coastal zone, green cover, water bodies etc.) during our operations	Compliance
Map existing biodiversity aspects, identifying significant impacts and develop sector level customized biodiversity conservation strategies aligning to the Group Sustainable Business Framework	Align to ESG Framework and develop sector level strategies
Identifying and appointing competent teams to drive effective implementation and ensure the availability of relevant information, documents, training tools and guidance to effectively drive the biodiversity conservation strategy aligned with the operating model and business requirements of the sector	Identify and assign individual and functional roles and responsibilities
Accountability for all operations and creating systems to respond to any aberration with the aim of preserving biodiversity resources	Accountability

Define best quantification mechanism for biodiversity impacts and ensure the 100% complete and accurate reporting, tracking and record keeping of all relevant progress / impacts on timely basis	Complete and accurate reporting on time
Align our biodiversity journey with national and global level biodiversity road maps and drive initiatives for restoration of degraded habitats and enhancement of biodiversity in areas (near or far to establishments) which may have been lost due to human intervention	Align with national and global roadmaps
Minimization of adverse impacts on biodiversity through the right combination of sustainable operation practices and technologies	Sustainable practices and technology
Capacity building and regular knowledge sharing on biodiversity with relevant stakeholders	Capacity building of stakeholders
Raise employee awareness with the aim of extending the program impact into employees' work places as well as their communities	Employee awareness
Promoting biodiversity conservations through identified corporate responsibility programs	Biodiversity conservation related CSR activities
Establishing suitable communication programs through; Participating in industry associations and other forums to share and promote best practices for biodiversity conservation Communicating biodiversity-related activities to customers, employees and any other interested outside audiences. Engaging with government, local communities and others to understand and work to address significant biodiversity issues in areas where we operate	Promoting best practices Community engagement for biodiversity conservation

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating work with them to establish and aware sustainable practices.

4. RESPONSIBILITY

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to.

