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1. SCOPE

This document constitutes the basic framework of a Sustainability Management System (SMS) that can be adapted and developed to cover all management processes of our hotel, and also sets out the policies and practices of our organization. This document has been prepared for all stakeholders, guests and staff of the hotel. Our system is continuously developed to suit the size and scope of our hotel.

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1. SUSTAINABLE MANAGEMENT SYSTEM

The basis of our sustainable management system is based on risk analysis. Risk analysis is performed under the headings of environment, natural disasters, society, culture, economy, quality, human rights, health, and security. New headings can be added if necessary.

After the risks are analyzed, we also have a crisis management policy and system that determines what to do in case the risks occur. The annex of this document includes how to conduct risk analysis and crisis management.

SYS includes the implementation of certain policies by all employees on quality, economy, management, environment, culture, human rights, health, and security, setting goals, and monitoring whether the goals are achieved and continuously improving business management processes.

If the determined goals are achieved, new goals are determined. If they are not achieved, our goals, policies, and practices are reviewed. In this way, we strive to ensure continuous improvement.

The goals related to our hotel's management system and the performance indicators that monitor compliance with the goals are included in the annex of this document.

Our hotel, regarding sustainability, undertakes to fulfill the third stage obligations of the Turkey Sustainable Tourism Program and to continuously improve the sustainable management system in order to increase sustainability performance.

Our management system is constantly reviewed due to the status of the sector, environmental, social, technological, economic and cultural risks, changes and updates originating from legislation, and if necessary, the system and policies are updated.

The steps mentioned above can be summarized as the Plan-Do-Check-Take Precautions (PUKÖ) approach.

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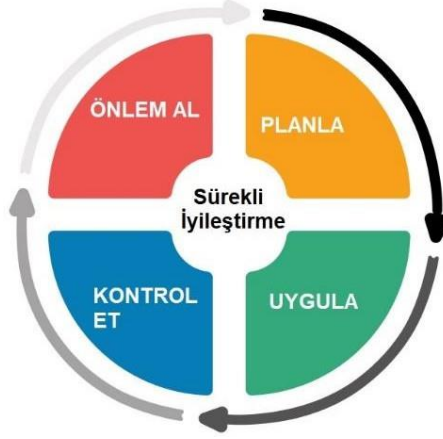


Figure 1. PDCA Cycle

Plan: Our hotel attaches importance to the environment, society, culture, national economy and management system and sets goals. It plans the roadmap and actions to be followed in order to achieve the determined goals.

Apply: Our hotel determines its basic policies and practices regarding environmental, cultural, social, human rights, health and safety. It monitors, measures and records these at intervals defined by the relevant personnel.

Check one: In our hotel, feedback from both staff and customers is monitored and recorded. Corrective measures are taken if necessary.

Take precautions: This is the step where our hotel takes action to correct the problems identified in the check step. Corrective measures and actions are recorded and archived.

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1. LEGAL COMPLIANCE

Our hotel undertakes to comply with the applicable laws, regulations and international agreements, maintains an up-to-date list of these and regularly informs its staff about them, and provides the necessary training to the staff. Our hotel presents all necessary permits, certificates and documents to the relevant persons and institutions upon request or request.

These documents are the Business Opening and Operating License, the last month's personnel insurance declaration, tax certificate, emergency action plan, personnel training and certificates, the contract with the workplace doctor, the sewer connection document received from the municipality, documents indicating that pest control has been carried out and other necessary documents.

1. STAKEHOLDERS AND COMMUNICATION

Our hotel provides accurate information to all segments in promotion. It always uses real visual material in promotion. Our hotel has a transparent and realistic structure in terms of its products and services on its website, social media accounts and other printed and written promotional channels and marketing communications.

Our hotel also shares its actions, operations and processes regarding policy and sustainability with its employees and customers in an open and transparent manner. Our hotel's website is used to do this. Periodic reports on sustainability performance are published on our website. These reports are prepared in periods appropriate to their subject.

There is a system in our hotel that aims to receive feedback from our customers, public institutions, municipalities, employees, the local community and all other relevant individuals and institutions regarding our sustainability performance, policies and practices. We receive feedback from both our staff and our customers through this system.

Our system is designed to enable and encourage our customers and staff to provide feedback quickly, easily and effectively. This system includes survey applications for guests, regular monitoring of social media accounts, e-mail, messaging services and other communication channels for employees, and e-mail communication and regular monitoring for all other stakeholders.

Customer experience: Customer satisfaction is important in our hotel. Customer satisfaction includes feedback from the system explained above regarding sustainability. The results obtained are analyzed. Negative feedback and responses to it are recorded and necessary measures are taken.

Staff participation: The most important element of our hotel's management system is our employees.

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Our employees know what they need to do in our management system and sustainability policies and practices. What our employees need to do is defined in writing, communicated to them and the necessary training and guidance are provided regularly. Trainings on this subject are recorded.

Our employees play an active role in the development and continuous improvement of our management system and sustainability performance. We review and improve our system in line with the feedback we receive from our employees.

In line with our sustainability policies and management system; periodic training programs, on-the-job training, trainings required by legal regulations and guidance support are provided to employees regarding sustainability and their work areas, including orientation trainings. We implement annual training plans on Occupational Health and Safety trainings, hygiene trainings for kitchen/service/massage etc. personnel, water and energy saving, chemical substance usage rules, fire protection, first aid, etc.

Our employees have free and open access to all our training materials.

Our hotel is committed to complying with the relevant provisions of the Labor Law No. 4857 and pays at least the minimum wage to its employees. Our hotel also undertakes to comply with the Social Insurance and General Health Insurance Law No. 5510 and the Occupational Health and Safety Law No. 6331. Our hotel has established a “Sustainability Team” to manage sustainability activities.

ACCESSIBILITY

Our hotel is committed to providing accessible tourism services to everyone within its means and informs its customers and stakeholders about the level of accessibility clearly and accurately through its website.

Our hotel is also committed to fully complying with legal regulations regarding accessibility and to continuously improving this issue.

1. PURCHASE

Our purchasing policy includes policies for local, environmentally friendly, fair trade and efficient purchasing. Our hotel monitors our sources of goods and services. We meet with our suppliers at regular intervals. We check their sustainability-related certificates, information and documents.

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Local purchasing: Our hotel prioritizes local suppliers when purchasing goods and services, provided that they are of good quality and reasonably priced. Therefore, it regularly inspects its suppliers, updates its supplier list and informs its suppliers. The proportion of goods and services received from the local community is measured.

Our hotel also prioritizes fair trade suppliers when purchasing goods and services, provided that they are of good quality and reasonably priced for imported products.

Environmentally friendly purchasing: Our hotel follows an environmentally friendly purchasing policy, and prioritizes efficient purchasing, energy saving and water saving in order to reduce food and solid waste.

Our hotel prioritizes environmentally friendly products (environmentally labeled products) in its purchases. If there are no environmentally labeled products in the product group to be purchased, it selects the relevant products from suppliers and manufacturers whose production and all other processes do not harm the environment.

In this context, our hotel prioritizes selecting suppliers with sustainability certificates when making its purchases. Example certificates that can be sought from suppliers are documents such as ISO14001, ISO50001, ISO14064, ISO20400.

For wood, fish, paper and other foods, environmentally certified (FSC, MSC, AB-EcoLabel, etc.) or products whose source can be traced are preferred.

Endangered species and species prohibited for sale (fish, trees, plants, game, etc.) are not purchased or used in our hotel.

The ratio of our purchases from environmentally certified, local producers and suppliers, and fair trade suppliers to our total purchases is measured. Our hotel has goals regarding environmentally certified, local and fair trade purchasing. In this context, we aim to increase the rate and number of local and fair trade suppliers in our purchases and we are careful about this.

Efficient purchasing: Our purchasing policy prefers reusable, returnable and recycled goods.

Our hotel also prioritizes bulk and bulk product purchases. In this way, fewer shipments are made to our hotel and less greenhouse gas emissions are produced.

Our main priority and preference is to avoid unnecessary and excessive plastic, nylon, paper, glass and wooden packaging in the products arriving at our hotel.

Disposable products and unnecessary packaging (especially plastic) are avoided in the purchase of consumables and toiletries. The purchase and use of consumables and disposable products are monitored and managed.

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ENVIRONMENT AND NATURE PROTECTION

Our main goal is to protect our resources in the most efficient way, to prevent environmental pollution and to protect nature, to reduce the amount of our waste, to recycle or to render it harmless. We strive to take the necessary precautions and actions by being aware of our environmental impacts.

We undertake to be an environmentally friendly institution with a sense of social responsibility by ensuring the prevention of pollution and sustainability in the implementation and presentation of our products and services in accordance with international and national legal conditions and regulations as well as internal and external customer conditions in our business.

- While fulfilling this commitment,
- We determine our impacts on the environment and take them under control.
- We are prepared for emergency situations (fire, explosion, flood, earthquake, leakage, etc.) related to pollution risks and comply with legal regulations.
- We strive to minimize our waste, prevent pollution at its source, use energy efficiently and reduce the impacts of our activities on the environment.
- We continuously improve our environmental performance in waste separation and waste reduction, and efficient use of natural resources.
- We monitor the recycling and disposal of waste.
- We train our employees on chemical use, environmental impacts and waste.
- We encourage our employees and guests to be sensitive to the environment, and we develop our employees by providing them with training on environmental awareness and efficient use of energy.
- We use energy and water saving systems in our hotel
- We raise awareness and encourage our suppliers and stakeholders on energy efficiency studies.
- We donate trees to environmental organizations and the theme in order to minimize the damage to nature in carbon emissions.

ENERGY MANAGEMENT

Energy saving: Our hotel has an energy saving policy. The policy includes regular measurement, monitoring and reduction of energy consumption. Our hotel groups energy consumption according to energy type, and energy consumption of different units is monitored.

The total energy used in our hotel is measured according to type.

Our hotel determines the activities where energy consumption is high, plans and implements corrective measures to reduce energy consumption in these areas and activities (heat insulation systems, preference of low-consumption devices among energy consumption classes, use of LED bulbs instead of high-energy-consuming lighting such as incandescent, etc.). In addition, our hotel uses energy-saving equipment.

Our hotel informs and trains its employees and stakeholders about energy saving. Environmental elements within the scope of Sustainability in our hotel

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- A digital recording system has been launched in supplier, purchasing and office works to minimize paper consumption.
- E-invoice has been implemented in invoicing transactions in Accounting.
- Packaging Waste is collected and delivered to the local administration in a controlled manner.
- Glass bottle application has been implemented in the room minibar in our facility.
- Awareness-raising activities have been carried out to minimize the use of electricity, water and energy resources used in common areas.
- Aerator application has been made in the taps used in all rooms and areas and water flow adjustments have been adjusted to fill a 1-liter container in 12 seconds.
- All air conditioning system temperatures have been set at 18-23 degrees.
- Ecolabel product use has been prioritized in suppliers.
- Priority is given to local and closest suppliers to reduce carbon emissions.

WATER MANAGEMENT AND WASTEWATER

Our hotel has a water saving policy. Our policy includes regular measurement, monitoring and reduction of water consumption.

The water risk situation in the region where our hotel is located has been determined. For this purpose, the Water Risk Atlas prepared by the World Resources Institute is used. The link to the relevant website is [here](#).

Water risk has also been evaluated in the risk analysis, and a water management plan has been prepared. This plan includes targets and reporting for measuring and monitoring water use and reducing water consumption.

Due to our hotel's water use activities, living creatures in waters such as seas and lakes are not harmed. Nevertheless, the possibility of harm to these creatures has been evaluated in the risk analysis and the necessary precautions have been taken.

Our hotel complies with all legal requirements and regulations in the use of water.

Water comes from a legal and sustainable source.

We measure our water consumption. The total water used per guest or per night is calculated and reported. The file attached to this document is used for measurement.

We have targets for reducing water consumption. Our hotel plans and implements corrective measures for this purpose. Water-saving equipment is used in our hotel. Our hotel uses good practices such as changing sheets and towels upon guest request.

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Our hotel informs and guides its employees and stakeholders about water conservation. Our hotel mobilizes all its resources to prevent wastewater from harming the environment.

The regulations determined by the local government are followed for the disposal of wastewater. Legal requirements are followed in this regard.

1. FOOD WASTE AND SOLID WASTE

Our hotel has a Solid Waste Management Plan. The plan includes regular measurement and monitoring of waste production, waste reduction, reuse, recycling and waste disposal.

Solid waste is separated according to its types such as food, recyclable, toxic/hazardous and organic, and recycling and reuse statuses are taken into consideration during separation.

Our hotel regularly informs and guides its employees and stakeholders about waste management with various visual and communication materials.

Solid waste separated according to its types in our hotel is collected by authorized and licensed companies.

Solid waste, including food waste, is measured according to its type. The amount of solid waste per guest or overnight stay in our hotel is calculated and reported.

Our hotel has also identified activities and risk areas where solid waste generation is high. It plans and implements corrective measures to reduce food waste and waste.

It is aimed that solid waste disposal does not have a negative impact on the local population or the environment. Compliance with the "Zero Waste Regulation" legislation regarding solid waste management is ensured.

1. WORKS PLANNED TO BE CARRIED OUT WITHIN THE SCOPE OF SUSTAINABILITY

- Continuously developing annual training plans to reduce energy and water consumption rates is our top priority.
- Ensuring sustainability with environmentally friendly and energy efficient machinery, equipment and consumables
- Developing projects to spread zero waste awareness to the general public in order to reduce waste and prevent recyclable waste from mixing with household waste with an effective waste management program
- We plan to increase the amount of donations to theme and environmental protection organizations by 2% each year in order to reduce carbon emissions and the damage done to nature to some extent.
- When determining our approved suppliers to reduce carbon emissions, our priority is to spread information activities on providing services with electric and new green vehicles with the lowest carbon emissions
- We will choose energies that produce less carbon
- With the awareness that the climate change problem is a global issue, we will work together with the private sector, government, local administrations and civil society organizations and be a part of the common solution. We will develop projects for street animals to protect natural life and support wildlife
- Provide stationery assistance to our staff with school-age children
- Create internship opportunities for tourism students to gain work experience
- Contact tourism schools in the region and open areas in our hotel for use as workshops
 - Plan career days with tourism high schools and universities and financially support social

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responsibility projects

- We plan projects to reduce the amount of waste by 1% each year.
- We will produce projects to reduce the consumption of disposable toiletries with a gradual transition program in at least 50% of guest rooms

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SUSTAINABLE MANAGEMENT SYSTEM POLICIES

QUALITY POLICY

On the way to achieving our vision;

- To meet the guests at the highest level and to be a pioneer organization in the sector,
- To create our founding philosophy with all our personnel, to provide continuous development, trust in the workplace and service that exceeds the expectations of our guests,
- To provide service by showing the necessary sensitivity with a preventive approach to food safety risks in accordance with national and international legislation and conditions, • To be an exemplary business for all other organizations in our country and to create value,
- To prevent these accidents by minimizing all risks that may endanger the health, life safety and work safety of our guests and personnel,
- To make quality measurable, to ensure continuous improvement of the system and to ensure the unity of our employees and management by setting targets,
- To create environmental awareness together with the hotel management and our personnel, to leave a cleaner, healthier and safer environment for future generations are among our primary quality goals.

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CULTURAL SUSTAINABILITY POLICY

Presentation of cultural heritage: Our hotel respects the intellectual property rights of the local people. Authentic elements of traditional and contemporary local culture are evaluated in our cuisine, design and decoration.

Works: Our hotel does not buy or sell historical and archaeological artifacts, does not mediate their trade, and does not exhibit them.

Promoting sustainable local gastronomy:

Our hotel prioritizes the promotion and consumption of local products. It puts forward innovative and creative practices to ensure sustainability in gastronomy in all its activities.

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ENVIRONMENTAL PROTECTION AND WASTE MANAGEMENT POLICY

We protect the environment in our business, prevent its pollution, and attach importance to its protection by reducing our negative impacts on the environment.

For this;

- We comply with legal regulations and try to reduce our environmental impact.
- We take care to effectively separate our waste according to its source, groups and hazard classes.
- We know that using hazardous substances and chemicals only when needed and as much as necessary will reduce both their negative impacts on the environment and the amount of waste,
- We contribute to protecting nature by preferring the materials we receive from our business that have “recycling” and “environmentally friendly” labels. We try to create reuse opportunities,
- We take care to use disposable materials such as paper, napkins, toilet paper and packaging as much as necessary and leave less waste in nature,
- We store waste in separate areas according to their characteristics correctly, deliver them to licensed/authorized companies without exceeding the legal storage period limits and keep their records,
- We try to use water, energy and all natural resources economically. We share this sensitivity with our employees, guests and suppliers.
- We measure our performance in environmental management, monitor this data with targets and try to improve our performance.
- We aim to educate our employees about the environment and increase their sensitivity.
- We take the necessary measures to protect the biodiversity in the environment and comply with all legal-requirements.

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CHILDREN'S RIGHTS EXPLOITATION AND HARASSMENT POLICY

Children are the future's trust. It is our primary responsibility to recognize them as individuals, respect their rights, and protect and monitor them against all kinds of psychological, physical, commercial, etc. exploitation.

To ensure this;

- We do not allow child labor in our own institutions and expect the same sensitivity from all our business partners.
- We provide environments/opportunities that contribute to the development of children within the business, where they can express their thoughts, wishes, and feelings freely and feel free and comfortable.
- We provide training to our employees on preventing and recognizing child abuse.
- We ensure that children are under adult supervision in the activities they participate in.
- We organize training to raise awareness on the protection of children's rights and support relevant projects.
- When we witness suspicious actions regarding children, we first inform the hotel management and request assistance from official institutions when deemed necessary.

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ENERGY EFFICIENCY POLICY

We use our energy efficiently to protect our world from potential dangers and set goals to reduce our energy consumption.

For this,

- We follow national and international standards, laws and regulations in order to fulfill both our responsibilities towards nature and our legal obligations, we voluntarily carry out studies that will reduce energy use and/or continuously improve our energy consumption performance, and we follow the results of our studies.
- We set goals and include energy efficiency in our training programs in order to ensure the participation of our employees.
- We value collaborating with all our stakeholders to create common goals and results in energy management. We try to continue our interaction in order to reach a total awareness and consciousness level with our guests, employees, visitors and all our business partners on these issues.
- We try to research, find, purchase and use energy efficient suitable products, equipment, fittings and technology alternatives.
- We aim to document our Energy Management System, spread it to all our departments, update it when necessary, review it and continuously improve it.
- We evaluate energy risks or emergencies that may arise such as energy restrictions, and plan the precautions to be taken.
- We take care to effectively separate our waste according to its source, groups and hazard classes.
- We know that using hazardous substances and chemicals only when needed and as much as necessary will reduce both the negative effects on the environment and the amount of waste,
- We contribute to protecting nature by preferring the materials we receive in our business that have “recycling” and “environmentally friendly” labels. We try to create reuse opportunities,
- We take care to use disposable materials such as paper, napkins, toilet paper and packaging as much as necessary and leave less waste in nature,
- We store waste in separate areas according to their characteristics correctly, deliver them to licensed/authorized companies without exceeding the legal storage period limits and keep their records,

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- We try to use water, energy and all natural resources economically. We share this sensitivity with our employees, guests and suppliers.
- We measure our performance in environmental management, monitor this data with targets and try to improve our performance.
- We aim to educate our employees about the environment and increase their awareness.

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HUMAN RESOURCES POLICY

In our spirit, our employees are the most important resource that makes us who we are. With this awareness, issues such as our employees' social and fringe benefits, performance management, rewards, training and career management, and employee safety are always our priorities.

Our Human Resources Vision;

To create qualified human resources that are highly motivated, protect and enhance the corporate image, highlight innovative work, give importance to service and see their work as part of a whole, to prioritize local employment and to be a pioneer in the sector and in Turkey in integrated human resources practices with a promotion program.

Our Human Resources Mission;

- To plan and train human resources that will realize the organization's goals and strategies, to perform personnel work and procedures at an optimum level, to have highly self-confident personnel who are specialized in their fields, have the ability to represent the organization and can create new initiatives in their fields.
- To provide strategic support to all companies and departments to improve business results through human resources management, to create and encourage a high performance culture, and to contribute to creating value for all stakeholders.
- Our employees know what they need to do in our management system and sustainability-related policies and practices. What our employees need to do is defined in writing, communicated to them, and the necessary training and guidance is provided regularly. Trainings on this subject are recorded.
- Our employees play an active role in the development and continuous improvement of our management system and sustainability performance.
- We review and improve our system in line with the feedback from our employees.

Fair pricing

- Our employees are informed about their wages, working conditions, working hours, and when they will receive their wages before they start working in our facilities.

Education and Career Management

- All of our employees can benefit from the right to education equally. In addition to the legal and professional training required by the hotel industry, employees are provided with periodic training programs, on-the-job training, trainings required by legal regulations and guidance support regarding sustainability and their fields of work, including orientation trainings in line with our sustainability policies and management system. We implement annual training plans on Occupational Health and Safety trainings, hygiene trainings for kitchen/service/massage etc. personnel, water and energy saving, chemical substance usage rules, fire protection, first aid, etc.

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- Our employees have free and open access to all of our training materials.
- In career management, personnel tracking system and personnel promotion management are carried out according to the determined criteria.
- Our hotel undertakes to comply with the relevant provisions of the Labor Law No. 4857 and pays at least the minimum wage to its employees. Our hotel also undertakes to comply with the Social Insurance and General Health Insurance Law No. 5510 and the Occupational Health and Safety Law No. 6331.

Labor and Human Rights

- Ensuring absolute employee satisfaction is a priority issue. From this perspective, it is the management's responsibility to ensure the employee's legal rights, as well as some benefits provided by our business as fringe benefits; the working environment, psychology, self-motivation, performance, in short, all comfort at the workplace.
- Although we have foreign employees in our hotels, as a business that appeals to guests from different nations and provides services at an international level, discriminating against our guests or guests based on nationality, race, language, etc. is against both our hotel and business principles. Therefore, all personnel procedures of our employees from different countries or nationalities are followed in accordance with legal procedures, and equal opportunities are offered to all employees in the hotel regardless of their characteristics.

Local employment

- Our organization has a performance system based on local employment as a priority for employment. Priority is given to local people in recruitment

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OCCUPATIONAL HEALTH AND SAFETY POLICY

In order to protect our workplace, employees, guests and suppliers, to create a safe work environment and to ensure continuity;

- We comply with all legal and other obligations regarding Occupational Health and Safety.
- We adopt the principle that Occupational Health and Safety and improvement activities are the common responsibility of all employees.
- We set targets for participation at all levels in Risk Assessment and Risk Level Reduction activities.
- We aim to achieve the sustainable "Zero Work Accident" target by continuously improving our Occupational Health and Safety culture.
- We share the work we do within the scope of occupational health and safety with all our employees and our environment in order to be a pioneer and an example.

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WOMEN'S RIGHTS AND GENDER EQUALITY POLICY

We value gender equality in our business.

- We ensure the health, safety and well-being of all our employees regardless of gender.
- We support women's participation in the workforce in all our departments and offer equal opportunities.
- We act with the policy of "equal pay for equal work" without gender discrimination.
- We distribute tasks in accordance with the principle of equality.
- We provide the necessary environment for equal benefit from career opportunities.
- We create training policies and support women's participation and awareness.
- We create work environments and practices that protect work-family life balance.
- We support women to be in company management and offer equal opportunities.
- We never allow women to be subjected to abuse, harassment, discrimination, suppression, coercion, slander, etc. We are always aware of and support the value they add to the world and our organization.

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SOCIAL RESPONSIBILITY POLICY

We believe that all our employees have the right to work in a healthy and safe environment in working conditions that are in line with human dignity. Our primary business goal is to ensure and protect the safety of our employees, with the awareness that they are our most valuable asset.

Our hotel is always ready to implement the best environmental solutions beyond legal obligations, to develop and spread environmentally friendly technologies, and to support initiatives that will increase environmental awareness.

In Istanbul, where we operate, we take care to fulfill our social and environmental responsibilities towards society in a harmonious cooperation with our shareholders, employees, the public, non-governmental organizations and other stakeholders.

We believe that our human resources are the most important element of sustainable growth. We ensure that our employees' personal rights are used fully and correctly.

We approach our employees honestly and fairly, and we promise a non-discriminatory, safe and healthy working environment.

We make the necessary effort for the individual development of our employees and observe the balance between work life and private life.

We manage the environmental impacts that may arise from all our activities with a sense of responsibility. Within the framework of the principle of corporate social responsibility, we strive for the development of our society.

We support our employees to volunteer for appropriate social and community activities in which they will take part with a sense of social responsibility.

We take care to develop approaches to ensure that all our business partners, especially our suppliers, act in the field of social responsibility and to implement these approaches.

Within the framework of occupational health and safety, we have taken all precautions for our employees and we are also sensitive to the provision of necessary on-the-job training by experts in the field within the framework of the annual training program.

We act sensitively to the traditions and cultures of Turkey and the countries in which we operate and act in accordance with all legal regulations.