



# Sustainability Policy



## Introduction & Purpose:

Since our establishment in 1837, Imperial London Hotels has been at the forefront of providing authentic London experiences across our seven central London locations. Our mission is to make memorable stays accessible to everyone, a commitment we've upheld since our inception.

We acknowledge the environmental and social impacts of our operations and understand the importance of responsible business conduct. As a family-owned business, our approach is rooted in long-term sustainability, embodying a commitment to conducting business in a manner that benefits both people and the planet.

Through structured sustainability management, we aim to identify, assess, and address potential risks and opportunities for our organisation, the environment, and society at large. This ensures that we operate not just for the present, but with an eye towards future generations' wellbeing.

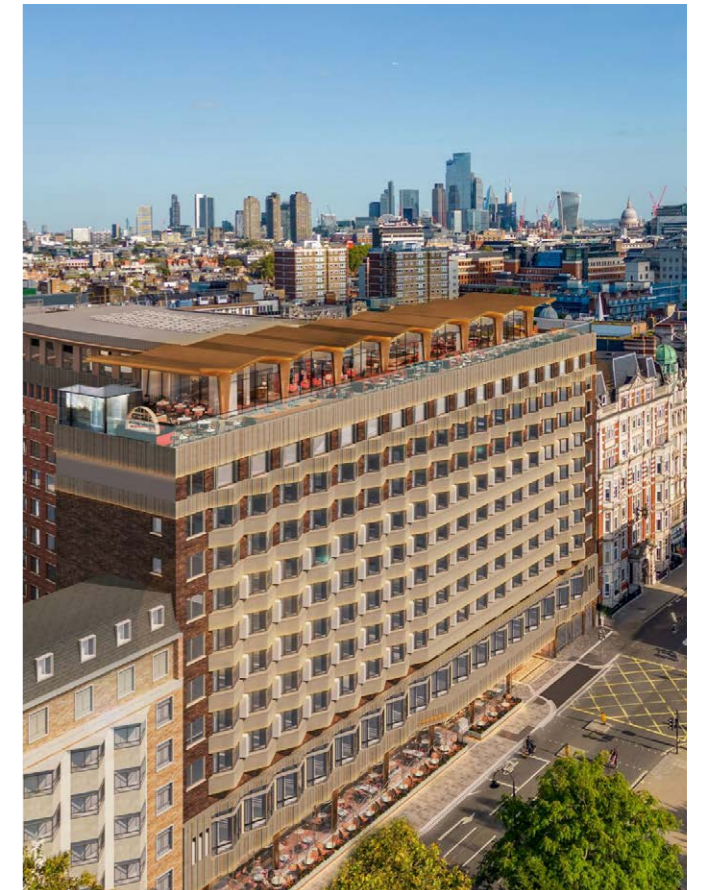
This Policy serves to formalise our approach to integrating environmental, social, and governance (ESG) considerations into our daily operations. It details our commitment to sustainable practices and outlines our strategy for achieving responsible business conduct.

## Scope & Applicability

This Policy covers the operations of our seven London hotels, with additional consideration of purchasing practices which extend our influence beyond our direct operations. This policy also considers hotel development and refurbishment projects outside the day-to-day operations of our hotels.

Every employee at Imperial London Hotels contributes to ensuring that the company's sustainability standards are met and suppliers and contractors are asked to uphold the standards and values outlined in this policy, where applicable.

Violations of this policy must be reported to management, the supervisor or anonymously via the whistleblowing system. Confidentiality and protection of the reporting party from negative consequences shall be maintained to the extent permitted by law.







# Our Commitment

## Environment



We recognise that our activities have an environmental impact and are committed to reducing these, starting with aspects most material to our business and the environment. This is demonstrated by our activities to reduce energy consumption, responsible waste management, and water reduction measures.

We have ambitious plans to set a Net Zero target to reduce our greenhouse gas (GHG) emissions. We are also aware that our purchasing creates an environmental impact beyond the boundaries of our organisation and therefore consider this in our procurement practices.

## Social



At the heart of our mission is making memorable stays accessible to all, grounded in the safety and wellbeing of both our guests and staff. Our approach includes comprehensive health and safety management alongside measures for mental and physical wellbeing of our team members. We prioritize wellbeing through professional development opportunities for staff, fostering open feedback channels with the business, and championing an inclusive workplace culture.

Recognising our role within local communities, we strive to make a positive impact that extends beyond creating employment opportunities. We are also committed to responsible procurement practices due to the impact of our purchasing on direct and indirect suppliers, considering the wellbeing of people employed by these businesses and the communities in which they operate.

## Governance



Effective governance in our business ensures that the Board of Directors can consistently make decisions in the best interests of employees, guests and the long-term success of the business, with these duties outlined in our annual financial statement. Effective governance also ensures that policies and practices filter down through the business to ensure we live the values we set ourselves. We have a comprehensive set of policies in place across the subjects most relevant to our business to ensure these topics are effectively managed, including health and safety, modern slavery, and diversity, equity and inclusion, as well as anti-bribery.

We provide training on core policies to ensure they are understood by employees and implemented in our hotels. Our expectations of employees are outlined in the Employee Code of Conduct which they are required to sign adherence to as part of induction. We provide a whistleblowing mechanism as part of the Employee Assistance Programme to enable employees to report concerns.





## Third-party certification, audit & alignment to frameworks:

We work with external partners to ensure that we follow best-practice and align to global frameworks, with auditing of our practices to provide additional assurance. We do this to ensure transparency and credibility:

- We work with Saeker on our Health and Safety framework and receive periodic audits from them to ensure continued compliance.
- We are dedicated to maintaining the highest standards of sustainability in the hospitality industry through our ongoing commitment to the Green Key certification. Currently, six of our hotels have achieved Green Key accreditation, demonstrating our unwavering dedication to environmental responsibility. The Green Key

certificate is the leading standard for excellence in the field of environmental responsibility and sustainable operation within the tourism industry.

- Our carbon footprint for 2023 has been calculated in line with the GHG Protocol framework by Sustainable Advantage who are a specialist sustainability consultancy. Sustainable Advantage have also helped us to define an ESG action plan based on an assessment of our current ESG activities and will support us in defining a Net Zero glidepath.
- We work with Entegra to audit our suppliers in support of our commitment to sustainable procurement practices.

## Responsibilities

Our Board of Directors hold ultimate responsibility for this Sustainability Policy, providing oversight, and strategic direction, and ensuring alignment with overall business objectives and risk management framework. ESG topics are a standing agenda item at board meetings.



## Monitoring Reporting

As our ESG programme evolves, we will continue to define clear objectives, supported by time-bound goals, enabling success to be measured against clear key performance indicators.

We plan to report externally on relevant ESG information through an annual ESG Report which outlines to both internal and external stakeholders our activities, targets and metrics, regarding our most material ESG topics. Progress against targets and commitments will be tracked and reported over time.

## Review Revision

This Policy and our developing ESG Strategy will receive ongoing review and revision:

- Quarterly review and revision initially whilst our ESG Strategy is in a rapid growth phase.
- Annual review and revision once our ESG Strategy is embedded.
- Intermittent review and revision when there is a material change.

### Document Control

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