

NEWGALE HOLIDAYS

ENVIRONMENT & SUSTAINABILITY POLICY

Introduction

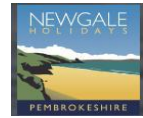
This policy is designed to guide and influence Newgale Holiday's "strategic" Sustainable Development (SD) aims.

This Environmental and Sustainability policy creates a baseline against which future sustainable developments may be assessed, reviewed and measured. It will use the Plan, Do, Check and Act principles as outlined below to continually enhance and improve its environmental performance:

- 1) **Plan** - Recognize an opportunity and plan a change.
- 2) **Do** - Test the change. Implement what has been planned.
- 3) **Check** – Review/Evaluate what has been done, analyse the results and identify what has been learned.
- 4) **Act** - Take action based on what has been learned. If the change did not work, go through the cycle again with an amended plan. If successful, incorporate wider changes within the organisation and wider community. Implement the learning and plan new improvements, then begin the cycle again, so that it becomes an iterative process and is embedded in the organisation's culture.

The document is produced on the basis that it will be used for two purposes:

- 1) To further develop Newgale Holiday's understanding of its already strong environmental performance/obligations and create a baseline.
- 2) To use the developed environmental and sustainability policy to articulate current thinking and help specify future developments in line with the business' carbon net zero ambitions.



Environment and Sustainable Development Policy

This policy aims to include environmental and sustainability issues within our strategic decision making processes to help us achieve our aims and vision.

Newgale Holidays recognises that what we do results in some emissions to air, land and water, and the generation of waste. It is our overall aim to minimise or completely mitigate our environmental impacts and to operate in an environmentally responsible manner. This policy summarises how we will achieve our aim:

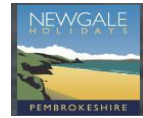
We will:

- Comply with, and exceed where practicable, in the premises we occupy, all applicable environmental legislation, regulations and codes of practice
- Integrate environment and sustainability considerations into our strategic and operational business decisions and ensure that activities are monitored, owned, and acted upon.
- Ensure that all our staff, suppliers, stakeholders and customers are fully aware of our Environmental and Sustainability Policy and are committed to supporting, implementing and improving it.
- Minimise unnecessary office and transportation activities to reduce the impact on the environment leading to a reduction in CO2 emissions
- Encourage and influence our suppliers, stakeholders and customers to develop and adopt appropriate, reciprocal, practices
- Review, report annually and continually strive to improve our environmental performance by setting increasingly demanding sustainability objectives
- Commit to the minimal use of all "resources", the prevention of pollution and the pursuit of best environmental and sustainability practices.

Our strategy to pursue our environment and sustainability policy

Newgale Holidays will deliver our policy by:

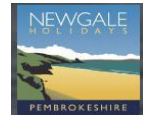
1. Endeavouring to obtain our energy needs from renewable, or at least low impact or sustainable, resources and actively conserving natural resources through increased energy efficiency and better water management.
2. Monitoring energy use frequently, in all areas of our premises, especially those with high usage, and publishing meaningful data which can be acted upon.
3. Purchasing or using equipment or supplies that are renewable, have been, or can be recycled; where practical, are recyclable or refurbished and from sustainable sources.



4. Informing staff, customers, suppliers and stakeholders, regularly and clearly, of our commitment to reducing environmental impact
5. Developing and implementing an environmental management system which may be used to pursue a relevant environmental accreditation (such as the ISO 14001 or BCorp, for example) if felt appropriate to our needs.
6. Designating energy conservation and minimising our CO2 footprint as key organisational objectives and instigating both within our day to day working procedures and staff/management duties. We will do this by:
 - a. Setting appropriate Key Performance Indicators which are monitored
 - b. And reported against and acted upon tactically by a designated Environmental Manager or "Lead" and strategically at Board level.
7. Actively promoting recycling to all involved with us.
8. Controlling and minimising all forms of waste.
9. Promoting efficient use of materials and resources throughout our facilities including gas, oil, water, electricity and other resources, particularly those that are non-renewable.
10. Including energy life-cycle costing within equipment purchasing procedures to ensure prudent procurement which supports our long term environmental aims.
11. Including energy awareness, education, usage management, monitoring and information within future staff induction & subsequent training programmes.
12. Encouraging and implementing staff and customer awareness campaigns to regularly consider our energy and environmental actions so that all adopt sustainable behaviours in how our facilities are used.
13. Monitoring and reducing energy usage by a fixed agreed annual percentage target in line with our business plan and future premises requirements.
14. Working with others to identify best practice and usage efficiencies.
15. Pursuing continuous improvement in how we use and conserve energy.
16. Recycling, where feasible and minimising the amount going to landfill.
17. Avoiding (unnecessary) use of hazardous materials and products, seeking substitutions when feasible, taking all reasonable steps to protect human and wildlife health and the environment when such materials must be used, stored and disposed of.
18. Applying best practice guidelines specific for the different areas of the premises we use to minimise energy usage in relation to comfort levels for customer, stakeholder or suppliers.
19. Continually researching viable options for further energy usage reduction schemes within our premises or activities (e.g. renewable energy sources, ground/air source heating, Tide and Wave power, Solar/Photo Voltaic, Biomass etc.).
20. Monitoring progress and reviewing our environmental performance and actions annually.

WORKING PRACTICES AND ADVICE TO CLIENTS

- Undertake voluntary work with the local community and / or environmental organisations and make appropriate in-kind or monetary donations
- Seek to offset carbon emissions from our activities either with a third party or potentially develop our own inhouse offsetting or carbon sequestration activities, relevant to our sector/products/services.



- Ensure that any associates or contractors that we employ take account of sustainability issues in their advice to clients.
- Include a copy of our Sustainability Policy in all our proposals to clients and stakeholders.
- Minimise Printing.

Mental Health and Wellbeing

1. Policy Statement

In accordance with our responsibilities under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999, Newgale Holidays will take all reasonable steps to minimise the danger of workplace factors creating or exacerbating mental health difficulties. This will be done through increasing understanding and awareness; assessing work related risks; and addressing promptly any issues which are identified as potential hazards to health and wellbeing. Although clearly not within our control, we will also deal sensitively with any personal pressures which may impact on an employee's work.

We recognise that some employees may experience or have a history of a longer-term or recurring mental health condition which could be considered a disability in accordance with the Equalities Act 2010. To support employees in this position, Newgale Holidays will provide reasonable and practicable workplace adjustments which help to remove or reduce any substantial disadvantage. Professional advice and guidance may be sought as to how best to accommodate individual circumstances.

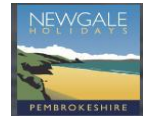
We will not tolerate victimisation, harassment or unlawful discrimination against any employee or applicant for employment in relation to mental health. A disciplinary sanction, up to and including dismissal, may result.

2. Implementation, monitoring and review of the policy

Overall responsibility for policy implementation, monitoring and review lies with us. Everyone covered by the scope of the policy will be obliged to adhere to and facilitate implementation of this policy. Appropriate action will be taken to inform all new and existing employees and others covered by the scope of the existence of the policy and their role in adhering to it. The policy will be reviewed at such times as legislation or a change to our policy position requires it. Our abbreviated policy may be made available to the general public via our digital marketing channels.

3. Work-Related Mental Health Difficulties

The mental health difficulty most commonly regarded as potentially work-related is stress. The Health and Safety Executive defines stress as:



“the adverse reaction people have to excessive pressures or other types of demand placed on them”.

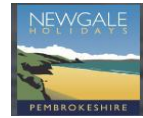
There is an important distinction between the beneficial effects of reasonable pressure and challenge which can be motivating and stimulating and stress which can be detrimental to health.

Many factors both inside and outside the workplace can lead to stress. Stress can affect people mentally (anxiety and depression) and physically (heart disease, back pain, alcohol and drug dependency). We will take all reasonable steps to ensure that the health of our employees is not placed at risk through the way in which work is organised; the way in which people deal with each other; and the daily demands placed upon them. We will promote awareness of the symptoms of stress and encourage employees to report concerns promptly and will provide all personnel with training on how to recognise and manage stress.

4. Management team commitment

Our management team commits to implement this policy by:

- Regularly reviewing and updating HR policies to ensure aspects of mental health awareness and wellness are covered.
- Utilising a wellness action plan when concerns are raised by an employee about their mental health
- Including sections in future documentation to be circulated externally (alongside details of the activity undertaken to promote equality) which outlines any activity taken in the year to support / promote mental wellbeing.
- Communicating to all personnel what steps are being taken in support of good mental health and why this is important.
- Including an agenda item in management meetings for discussing (and minimising) any risks which could result from a deterioration of mental health among our staff. Including a high level assessment (not of individuals) about the state of the mental health in the workplace incorporating any appropriate actions.
- Fostering an organisational culture of respect, open communication, involvement and participation;
- Providing a healthy and safe working environment, being particularly mindful of any employees who are working remotely and by complying with the Working Time Regulations provisions as outlined in the Working Hours and our Annual Leave policy;
- Setting a clear organisational purpose and direction supported by appropriate structures, systems, policies and processes;
- Ensuring there is sufficient organisational resource (human, financial and technological) to support achievement of our business objectives;



- Ensuring that employees are supported to complete their allocated tasks within reasonable time and their contracted hours;

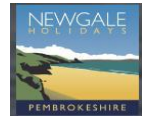
5. Employees are expected to:

- Take personal responsibility for their own health and wellbeing;
- Report promptly to their line manager any risks in the workplace which could potentially compromise their mental health and wellbeing;
- Seek support if they are experiencing mental health difficulties and alert their line manager, particularly if they believe the difficulties relate to the workplace (including when working remotely); and
- Adhere to our policies which are in place to support them.

UK Environmental/Sustainability legislation relevant to Newgale Holidays

This indicative list of legislation is to help you understand your potential environmental and sustainable development obligations to ensure legal compliance. It is important to note that environmental breaches are increasingly subject to litigation. It is considered critically important for Newgale Holidays that you avoid any non-conformance issues that could create any “reputational damage” which may compromise existing and future relationships with employees, customers, suppliers and stakeholders.

- Clean Air Act 1968
- Clean Air Act 1993
- Clean Neighbourhoods and Environment Act 2005
- Climate Change Act 2008
- Climate Change and Sustainable Energy Act 2006
- Energy Act 2010
- Environment Act 1995
- Environmental Protection Act 1990
- Flood and Water Management Act 2010
- Natural Environment and Rural Communities Act 2006
- Planning Act 2008
- Pollution Prevention and Control Act 1999
- Waste Minimisation Act 1998
- Water Act 2003
- BREEAM (Building Research Establishment Environmental Assessment Method) 1990



- Modern Slavery Act (2015)
- The Wellbeing of Future Generations Act (2016)
- The Welsh Language Act (2015).

This Policy will become available, electronically, on request. If you wish to obtain a copy or would like to discuss our thinking or progress against our environmental objectives, please contact Newgale Holidays Management.

This policy will be reviewed and updated annually in line with our current business plan and premises requirements.

Last updated – August 2023

Review date: August 2024