



RAAYA
BY ATMOSPHERE

MALDIVES

Sustainability Management Plan





RECORD OF REVISIONS

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Policy Title	Sustainability Management Plan	To	RAAYA by Atmosphere
Issued by	Executive Office	Approved by	Mario Stanic General Manager
Issued date	11 July 2024	Revised Date	December 2025

PURPOSE

The Sustainability Management Plan ensures that decision making within our group contributes to achieve its objectives, to improve its sustainability, reduce its long-term environmental impact and increase the welfare of employees, guests and the environment surrounding us. The Sustainability Management Plan is to guide the daily operations of the business in a sustainable manner in considering the environmental, socio-cultural, quality, and health & safety issues.

Energy Conservation objectives

- Green energy utilization.
- Reduction in amount of CO2 emissions.
- Optimize energy efficiency of plants.
- Reduce energy expenditure.

• Waste management objectives:

- Reduce water expenditure.
- Reduce the amount of non-recyclable waste.
- Increase the amount of waste that we recycle.
- Improve the results obtained in previous years.

• General objectives:

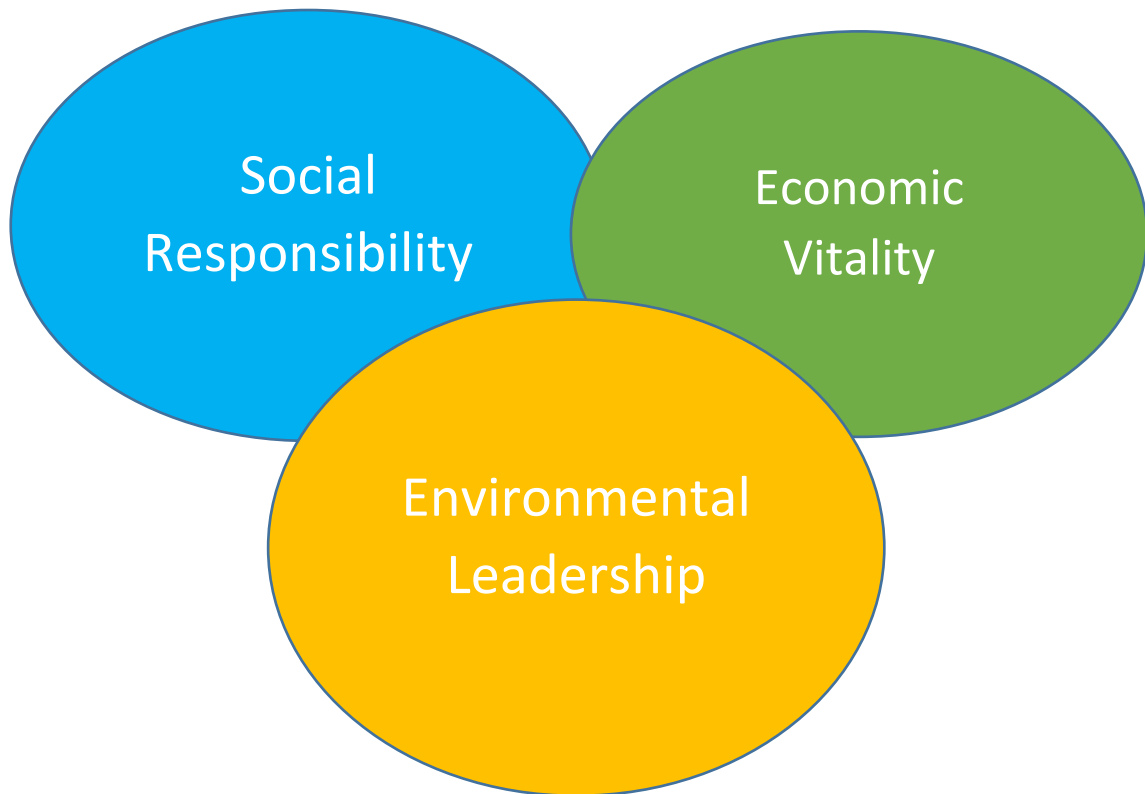
- Achieve Green Globe certification for all our properties.
- Lead the decision-making process to be more sustainable.
- Develop a business strategy based on sustainability, quality, safety & health.

• Satisfaction goals:

- Increase commitment with our customers.
- Increase customer satisfaction measured by surveys.
- Provide clients with information on good waste management practices.
- Provide clients with information on the company's CSR projects.

• Training objectives:

- Raise awareness of the company's CRS workers.
- All workers are aware of environmental policies.
- Conduct Recycling training for colleagues.
- Train a minimum of 1 department per year in sustainability.



SCOPE

The scope of the Sustainability Management Plan covers all activities at properties coming under Atmosphere Hotels and Resorts, and its integration with all colleagues, customers and guests, business partners, owners, other stakeholders, and the environment at large.

REFERENCE:

Green Globe Certification Standard and Guide to Certification.

THE ATMOSPHERE HOTELS AND RESORTS VISION:

We consider Green Globe as the premier global certification for sustainable travel and tourism. Green Globe Certification offers the world's most recognized and longest running program allowing us, as one of the green leaders in the travel and tourism industry, to confidently promote our environmental credentials along with our commitment to the people and prosperity of our location.

That is the reason why we took up the challenge and wish to obtain Green Globe certification for all our properties in 2019. It is our aim to continually improve our sustainability efforts, and to achieve in a consistent way improvement in connection with our yearly review.

Sustainability within Atmosphere Hotels and Resorts is defined as "carrying out its business in line with our company's guiding principles of being conscious of global environment issues and acknowledge our responsibility towards the environment. While the well-being of our guests remains the fore-front, we commit ourselves to carrying out operations in a sustainable manner, taking every step to minimize operational impact on, and preserve the environment wherever we operate."

We believe, our guests, staff and environment are equally important. Our Sustainable Management Plan ensures colleagues, customers, business partners, owners, other stakeholders, the environment and the property are taken care.

Our Sustainability Management Plan encompasses four key areas:

- I. **Environmental** – to be actively involved in conserving resources, utilizing renewable energy to extent possible, reducing pollution, conserving biodiversity, ecosystems, and landscapes.
- II. **Socio-cultural** – to be involved in corporate social responsibility actions, community development, local employment, fair trade, respect local communities, colleague protection. Being involve with activities to support the local community
- III. **Quality** – any activity that can sustain itself economically through creating competitive advantages within the industry with inspired service that not only meets, but exceeds guest expectations; it continues to contribute to the economic well-being of the surrounding community through local ownership, employment, buying local products, etc. A sustainable business should benefit its colleagues, customers, business partners, owners, other stakeholders.
- IV. **Health & Safety** – Atmosphere Hotels and Resorts complies with all established health and safety regulations and ensures that both guest and colleagues protection instruments are in place.

A. SUSTAINABLE MANAGEMENT

A1. Implement a Sustainable Management Plan:

Our properties shall establish and maintain the SMP complying with requirements included in this section.

Our properties will provide and write Policies and Procedures that:

- a) are appropriate to the nature and scale of the organization's activities;
- b) are aligned with the four key SMP areas i.e. Environmental, socio-cultural, quality and health & safety issues.
- c) include a commitment to continual improvement of the SMP
- d) include a commitment to comply as a minimum with the current applicable legislations, regulations and other requirement to which the organization subscribes;
- e) provide a framework for setting and reviewing SMP objectives and targets;
- f) are documented, implemented, maintained and communicated to all colleagues;
- g) are available to all interested and affected parties; and
- h) are reviewed periodically to remain relevant and appropriate to the organization's SMP.

A2. Renewable Energy Initiatives – Initiated projects to install Solar PV panels on all available roof tops in all Atmosphere managed properties. Solar power plants have already been commissioned in 5 properties. In addition, we have utilized the Lagoon in one of the islands for floating platform with PV panels. Currently commissioned and in use capacity is 2.3 MW. Another 1.2 MW of Solar power is currently being installed and is expected to be commissioned by April 2023.

A3. Legal Compliance:

The Resort is licensed according to the law of the Republic of Maldives and in compliance with all relevant international or local legislations and regulations, including health, safety, labour, and environmental aspects, and insurance policies and other guest and colleague's protection instruments are up to date and in order.

A 4. Colleague Training:

Colleague hiring, training, annual appraisal and performance review, at our properties are in line with the corporate competencies and competency models, based on the company believe and expectations.

We strongly believe that as a growing company it is important to follow all the process, to achieve a healthy and balance team, by encouraging internal development and growth.

A.5 Customer Satisfaction

Our properties monitor customer satisfaction by receiving feedback in different ways and platform. We strongly believe, accept and work in any kind of positive or constructive feedback provided by our guest.

Besides customer satisfaction, we also review and monitor internal quality performance and satisfaction. Some of the tools used for monitoring and reviewing the same are:

- a. Customer Comment Cards
- b. Instant guest feedback log
- c. 24 – 48 hours' feedback
- d. Guest emails
- e. all 3rd party online platforms such as TripAdvisor, Booking.com and all social media channels.

A.6 Accuracy of Promotional Materials

All communication regarding promotional material at our properties goes through the Sales and Marketing team and is in line with the company standards, local regulations and cultural norms.

We do not overpromise or mislead our guests; promotional materials are truthful and do not promise more than can be reasonably expected by customers.

A.7 Local Zoning, Design and Construction

Our properties are always located in an uninhabited island which may have been operating as another resort previously. No local significant sites, water courses, wildlife of any sort, vegetation or residents would have been disturbed in an adverse manner.

Ongoing maintenance and repairs are performed regularly. The refurbishments, if any, include re-using as much of the original structure as possible, incorporate local design and architecture (i.e. kadjan roofing, dhoni shaped masts, coir, wood and bamboo) and renovation/interior design is always performed with the purpose of being as sustainable, energy-saving and long-lasting as possible, and includes use of environmentally sound materials.

A.8 Interpretative Tourism

We inform our guests about the local environment, local culture and cultural heritage through various means; may it be electronic or something as simple as friendly dialogue with guests. As the Maldives is predominantly a Muslim country, guests are made aware of the local culture during the holy month of Ramadan as special emphasis is made on period of fasting of colleagues.

Special Maldivian themed nights are held in the main restaurant every week, Friday being the national day, in which local people wear traditional cloths and perform for the guests, and try and involve them as much as possible.

On arrival to the resort, each guest is greeted with the sound of bodu-beru (traditional Maldivian drums).

Various expedition packages are available with the Resorts to visit nearby local islands, so that guests are able to experience the real Maldives, interact with the local community and support local businesses like handicrafts, and other souvenir shops.

A.9 Communications Strategy

We communicate with our guests and visitors to the hotel and the website in a comprehensive manner. Our implementations, plans and strategy for a sustainable operation are clearly defined, as well as our involvement with the local community and other charity work.

Our sustainable operations involve our guests, example: we have placed a Green cards in all the rooms in order to give our guests an option whether or not they want the bed linen and/or towels to be replaced for the day, hence, providing them with an opportunity to play a direct role in water and energy conservation.

Through our “Green book”, guests are informed about energy and water conservation practices, waste management initiatives and also reminded of the damage inflicted on fragile coral if one stands on them, and the need to protect the ecosystem around the island.

In the same way, guests are also politely requested to not collect or remove shells from the beach, even empty ones, as they could be the homes of hermit crabs.

A.10 Health and Safety

We follow strict environment, health and safety laws, regulations and procedures to conserve and protect the environment and create a workplace where we bring the best out of our colleagues whilst avoiding the risk of injury.

Colleagues are appropriately trained so as to make them aware of the health and safety issues while working and guests are made aware of hazards by using appropriate signage and other forms of communication.

Purchasing and operating policy for all mechanisms, equipment and facilities is that they be as environmentally friendly as possible: low emission and consuming minimum energy. Another requirement we try and meet is to procure goods and equipment which are durable and long lasting.

We have an experienced team of engineers and technicians who maintain the facilities and equipment, so that we have constant checks on them being in good working condition. All necessary and mandatory safety requirements for the same are in order, such as Risk Assessments and use of Personal Protective Equipment.

We have engaged the services of a Food Safety Company – FSA - who visit the premises quarterly to ensure the food safety compliance systems are in order. New kitchen colleagues are trained on safety and procedures, and must undergo a mandatory basic food hygiene course in food handling.

Highlights:

- Guests are made cautious by posting safety instructions in the villas and other public areas.
- Swimming pool depth is clearly marked including pictorial NO Diving Signs, life-rings and notice boards
- Basic Health and Safety training, fire training, evacuation drills are conducted regularly for colleagues.
- Safety stickers are placed on all full-length glass.
- All paint is environmentally friendly and lead free, with low VOC content.
- An active inhouse system is in place whereby colleagues are trained to report any malfunctions and leaks immediately, and there is a good follow up system to ensure the works are carried out satisfactorily.

A.11 Disaster Management

In the Maldives, Tsunami is a real threat, our properties take very seriously their Disaster Management plans, taking into account the three R's – Readiness; Response; Recovery.

Fire Safety: the resort uses the services of a third-party Fire company to inspect, analyses, advice, train and certify all colleagues.

Yearly drills are held involving all staff, where a real disaster is simulated and practice responses are undertaken. All drills are observed by independent parties and observations and reports written.

B. SOCIAL/ ECONOMIC

B.1 Community Development

This section is supported by the Atmosphere CSR policy; the policy states that the Company recognizes its role and responsibilities in contributing to the sustainable development of the communities in which it operates. This policy aims at maximizing the return on Community Investments and their impact on the local community.

Through our community investment initiative, we have identified unique areas of involvement where we can actively support our local communities and engage in a mutually rewarding way with our stakeholders.

Education: Supporting initiatives focused on vocational training and skills development that improve employability in the tourism and hospitality sector. This is done by taking on interns from local educational establishments and supporting their growth and development. Further job opportunities are offered within the company.

Healthcare: Supporting initiatives aimed at enhancing the health and well-being of local communities. We look into schemes of donating and sponsoring to the health facilities at local islands.

Cultural Preservation: Supporting initiatives aimed at enhancing the ability of small businesses that are strategically linked to business needs to perform more effectively in order to create economic growth. We regularly buy from local producers and support local fishermen.

Environmental Protection: Supporting initiatives that help protect the integrity of the environment.

In collaboration with TGI Maldives or a similar third party, we are committed to protecting and maintaining our marine environment, chiefly our house reef, which is constantly rated as one of the best snorkeling/diving spots in the Maldives. We engage a third party to conduct yearly checks of the health of the reef, and are proud to say that until now, we have consistently maintained the biodiversity. Additionally, we have initiated a program to catalogue all the marine species that are found in our waters, which will aid in our conservation and education efforts.

We also want to support initiatives that use innovative products and services to help solve environmental problems.

B.2 Local Employment

Atmosphere Hotels and Resorts proactively supports the recruitment and development of Maldivian nationals at various managerial level positions across its operational and support functions, with a view that such Maldivian nationals will be supported, mentored and guided to grow and move into leadership positions across the company.

The element of local employment is supported by:

- Equal Employment Opportunity policy (part of the Business Ethics and Conduct Policy)
- Code of Conduct policy (part of the Business Ethics and Conduct policy)
- Corporate Social Responsibility Policy
- Workplace Health and Safety policy

B.3 Fair Trade

Fair trade within our properties is driven by the “Procedure Goods & Services” process in the Maldives wherein resorts ensures the use of right methods to select suppliers and procure goods and services at the right quality, price, time, source and delivery while protecting the company.

Our Policy:

“We at Atmosphere Hotels and Resorts ensure that all processes are done in compliance with relevant laws and consistent with ethical, social and environmental standards.”

B.4 Local Entrepreneurs

Atmosphere Hotels and Resorts does not engage with local entrepreneurs dealing with historical artifacts. Moreover, it is not permitted by law.

It is worthwhile to state that we do engage in organizing events and activities that portray the local culture, especially during Ramadan, Eid, and Maldives National Day. Local craftsmen and businessmen are brought are encouraged to visit our properties to enable them to enhance their living, giving guests a chance to interact with them, and learn about local cultures.

B.5 Respect Local Population & Culture

As stated earlier the Maldives is predominantly a Muslim country and as such guests and colleagues are made aware of the local culture. All efforts are made, where applicable, that due respect is given to the local values and beliefs, and we commit to safeguarding the Maldivian culture and ensuring that the local community shares in the benefits of tourism.

B.6 Exploitation

Our properties are in strict compliance with the Maldives Labour Law. Hence, appropriate policies are in place against the employment of children, sexual harassment and exploitation.

The element of avoidance of exploitation is supported by:

- Equal Employment Opportunity policy (part of the Business Ethics and Conducts Policy)
- Code of Conduct policy (part of the Business Ethics and Conduct policy)
- Harassment Policy
- Maldives Labour Act

B.7 Equitable Hiring

Atmosphere Hotels and Resorts promotes diversity and equality on all levels of the business, and no colleagues or applications are discriminated against in any way.

All positions are filled on the basis of competence. Our hotels adhere to all local laws and regulations concerning labour laws, and offers conditions and wages superior to the minimum requirements.

Atmosphere Hotels and Resorts employ people of many nationalities – currently we have no less than 20 different nationalities on our properties. Women candidates are encouraged to apply across all levels of the business.

The Maldives has strict labour law-related issues, which we adhere to in full.

B.8 Colleague Protection

Salaries and benefits meet national regulations, and all payments required by law into insurance and pension funds are made on behalf of all colleagues. Overtime is paid for hours worked beyond the established work in accordance with the Maldives labour law. Week hours and working hours do not exceed the legal maximum established by the labour law, but being a hospitality industry at times a need might arise to work additional hours, colleagues are accordingly remunerated as per the policies outlined.

To further enforce colleague protection at our properties, the welfare Committee, comprising of employees of all levels and the management, holds regular meetings and ensures that any concerns or ideas from any colleague is given due consideration and actioned on if possible.

B.9 Basic Services

The activities of the business have not impacted or jeopardized resources or services in the local area or neighboring communities in any negative manner. The activities of the business generate a number of secure jobs and reflect a positive influence in the community.

B.10 Local Livelihood

Since our resorts are located on independent islands, and the business encompasses the entire island, its activities do not affect any of the other islands around. Access to land, water, housing, right-of-way and transport for any neighboring communities has not been impacted at all. On the contrary, the activities of the business contribute to the economy of neighboring islands by creating jobs and buying from them.

B.11 Bribery and Corruption

Atmosphere Hotels and Resorts prohibits all forms of bribery, directly or through third parties, including employees from soliciting, arranging or accepting bribes.

No direct or indirect contributions to political parties, etc, is made, as a way of obtaining advantage in business transactions.

The Resort will not deal with contractors and suppliers known or reasonably suspected to be paying bribes. Due diligence is undertaken in evaluating prospective contractors and suppliers to ensure that they have effective anti-bribery Program.

The element of avoidance of bribery and corruption is supported by:

- Code of Conduct policy (part of the Business Ethics and Conduct policy)
- Gift policy
- Anti-bribery and corruption policy

C: CULTURAL HERITAGE

Our colleagues are trained to guide guests towards the cultural sights and events and/or entertainment/restaurants that the guests are most interested in.

Local Maldivian culture and idiosyncrasies can be explained and discussed with guests, but mainly in a nice-to-know form, as the culture is significantly different from anywhere else in the western/developed part of the world, from where we have a substantial number of guests coming from.

Guests can read through the basic dos and don'ts in our inhouse Green Book through direct stream which contains the resort's environmentally conscious literature containing information on the resorts' sustainability initiatives, what they are doing for the environment and how guests can help.

Historical and archeological artifacts are not sold, traded, or displayed. Business complies with laws, standards and regulations concerning the protection of historical sites and cultural heritage.

Goods which are protected and may not be bought or taken are communicated to guests through in-house literature.

The Maldives is a treasure of marine diversity and fragile coral and their protection and natural growth is publicized as much as possible.

The villas and all public areas are of rustic ethnic charm and blend in naturally with the surroundings and landscape. The scenic beauty of the Maldives is enhanced through our thoughtful architecture and design of structures.

D: ENVIRONMENTAL

Our Resorts source and obtains many locally produced goods including watermelons, papayas, Kurumba, bananas, and many others which have been grown organically. Freshly caught fish using pole and line method is brought directly to us just off the sea by local fishermen every day.

As much as possible, we favor suppliers who conduct their business in a responsible and ethical manner. We buy in bulk to reduce packaging wastes. We prefer products which are eco-friendly, biodegradable, made from re-cycled material and have minimum impact on the environment.

We do not use any invasive alien species in our gardens and landscapes, we also minimize the trimming and trying to keep the native vegetation as undisturbed as possible. Measures are taken to prevent the introduction of pest and exotic species.

No captive wildlife, endangered species, products thereof or any form of unethical items are used, sold or allowed on our Resorts.

Our business activities do not impact on the habitat of local wildlife or plants, appropriate measures are taken to minimize noise, chemical pollution; artificial lighting from having impact on wildlife.

Endangered species, products thereof, or items stemming from unsustainable practices are not sold, traded, or displayed on the property's grounds.

Guests are provided with information about protected areas within the properties influence zone and encouraged to visit protected areas.

Guests are provided with information on native wildlife and plant species found in the area through our Green Book.

The element of environmental protection is supported by:

- Environmental Policy
- Pollution Management Plan
- Landscaping Policy
- Biodiversity Policy
- Green Book

This concludes the Sustainability Management Plan for Raaya by Atmosphere in 2025.

We are fully aware that sustainability is an ongoing journey; therefore, the Sustainability Management Plan will be reviewed annually.

The resorts will continuously measure and monitor the following at planned intervals to verify that we are achieving continuous improvement in the field of sustainability:

1. Electricity consumption
2. Water consumption
3. GHG emission
4. Amount of waste generated by the resort

Our Sustainability Management Plan is supported by the following Policies and procedures along with other supporting documents:

5. Environmental Policy
6. Health and Safety Policy
7. Business Ethics and Conduct Policy
8. Waste Management Plan
9. Environmentally Preferable Purchasing Policy
10. Environmental Impact Assessment Report
11. Landscaping Policy
12. Pollution Management Plan
13. Disaster Management Plan
14. Green Book