



TROU AUX BICHES  
BEACHCOMBER  
GOLF RESORT & SPA

# *Sustainability & ESG Policy*

## Be Responsible

At Beachcomber Resorts & Hotels, Sustainability is an integral part of how we operate, create value and contribute positively to the destinations in which we are present. Guided by our purpose and values, this policy defines the principles that shape our Environmental, Social and Governance (ESG) commitments across the Group and our value chain.

Our Sustainability approach is built on a risk-based and materiality-driven assessment of Environmental, Social and Governance topics relevant to our activities. It aligns with applicable regulatory requirements and recognised international and industry standards and is implemented through dedicated strategies, targets, action plans and management systems.

This policy is embedded across the Group through the 52 Commitments of our ESG Charter, which provide a common reference framework across the Group.

## Sustainability Governance and Reporting

Sustainability at Beachcomber is overseen by the ESG Committee, chaired by the Chief Executive Officer and composed of members of the Executive Team and the Head of Sustainability. The Committee is responsible for steering the Sustainability agenda, monitoring performance and ensuring alignment with the Group's strategic priorities. It reports regularly to the Board.

Our Sustainability performance is monitored through appropriate internal controls, management systems and reporting frameworks and is disclosed through our corporate and Sustainability reporting as well as other communication channels to our stakeholders.

The Head Office and our resorts are independently assessed against recognised industry standards. All applicable sites are EarthCheck Gold Certified, with regular third-party audits supporting continuous improvement.

## Be Conscious for the Planet

We are committed to operating climate-resilient resorts with care and responsibility for the natural resources that sustain us.

We bring this vision to life through:

- reducing carbon emissions and adopting energy efficiency management systems;
- optimising our water footprint;
- reducing waste and enhancing circularity across our value chain;
- protecting biodiversity and ecosystems;
- limiting the impact of our operations to air, water, soil and marine environment by embracing an environmental management system.

## Be Caring for People

We put our Artisans, Guests and Communities at the heart of everything we do.

We are committed to:

- fostering an inclusive, safe and respectful working environment, with fair employment practices and continuous development of our Artisans, while maximising local employment;
- delivering meaningful and high-quality Guest Experiences, while encouraging respect for local culture and heritage; and
- supporting local communities through long-term partnerships and social investment initiatives, notably through our Fondation Espoir Développement Beachcomber.

Our social progress is monitored through key indicators, including Artisan engagement, Guest satisfaction and the reach of our community programmes.

## Be Engaged for transparent Governance

We pursue a better tomorrow through close collaboration and meaningful partnerships with our stakeholders.

We are guided by:

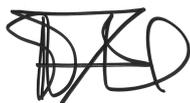
- responsible sourcing practices including local, eco and fairtrade product sourcing and service excellence across our value chain;
- transparency and accountability at every level of the organisation;
- the highest ethical standards and regulatory compliance in all our interactions, as set out in our Code of Ethics & Conduct, which guides our business behaviour and decision-making; and
- the commitment to protect the data privacy of our stakeholders and implement data security measures in line with risk level.

## Review

This policy applies at Group and site level and is reviewed periodically to ensure its continued relevance and alignment with evolving regulatory requirements, stakeholder expectations and industry best practices.

## Scope of site for EarthCheck Certification

Trou Aux Biches Beachcomber Golf Resort & Spa is located in the northwest of the island, sitting on 28 hectares. The hotel has 432 rooms including 66 Beachfront Suites, 32 Villas and 240 Suites arranged in six crescents, swimming pools, six restaurants, a Spa and Fitness center, a Kids Club, a Teens Club, conference room, a wide array of land and water sports, a diving center, and three wetlands connected by a green belt of 1km long and 20 meters wide along the road.



**Stéphane POUPINEL DE VALENCÉ**  
CHIEF EXECUTIVE OFFICER



**Théodose FLEURIÉ**  
GENERAL MANAGER

13 February 2026