
QUALITY POLICY

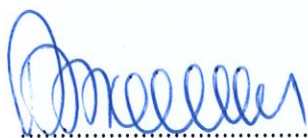
Sunprime Protaras Beach Hotel is committed to a high quality of products and services and therefore operates a quality management system. We aim to deliver quality, comfort and those little extras for the discerning traveler that enjoys the good things in life.

Our quality management system plans, performs, monitors, measures and improves the effectiveness and performance of our operations. It always ensures the following key factors:

- Offering a feeling of "being home"
- Treating each guest as individuals
- Caring for the guest
- Caring for the environment
- Providing professional cleaning routines
- Employing motivated and professional staff
- Ensuring guest satisfaction
- Working according to the operational standards

In addition, Sunprime Protaras Beach Hotel implements its legal obligations including hotel's operations, labour, environment, food and health safety.

We are fully committed to high quality, and both the management and employees will do their best to support this policy.



Hotel Manager

September 2025

ENVIRONMENTAL POLICY

Sunprime Protaras Beach Hotel is committed to reducing the environmental impact of its operations by using the principles of sustainability, implementing relevant legislation and promoting an environmental culture.

We firmly believe that environmental protection concerns everybody and has a benefit to our employees, guests, the local community, our country and the planet. The hotel sets environmental targets and actions for reducing its environmental impact, training its employees, supporting the local community and involving its guests.

We strongly support in reducing our greenhouse gas emissions year on year. We measure and publicly report our Scope 1 and 2 emissions annually, and quantify key Scope 3 impacts. Our reduction program prioritizes energy efficiency, renewable electricity procurement, responsible refrigerant management, water and waste minimisation, lower-carbon purchasing (including food). We engage suppliers and staff to support these actions.

We give emphasis at:

Reducing Reusing Recycling

We reduce our waste by

- ◆ Planning food production purchases;
- ◆ Using bulk quantities and large packaging wherever possible;
- ◆ Implementing a solid waste recycling program.

We reduce our energy consumption and improve our efficiency by

- ◆ Monitoring electricity consumption;
- ◆ Using only energy efficient lamps and equipment;
- ◆ Training our employees to save energy.

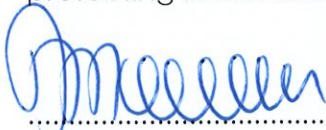
We reduce our water consumption and improve our efficiency by

- ◆ Reducing unnecessary washing of towels and bed linen;
- ◆ Training our employees to save water;
- ◆ Monitoring water consumption and water leakages.

We control hazardous substances by safe handling, storage, waste control, awareness and monitoring of used quantities.

We protect and enhance local biodiversity. We prevent habitat destruction and wildlife disturbance, prohibit any form of wildlife exploitation, and favour native, water-wise landscaping. Our purchases follow strict animal-welfare and no-wildlife-trade standards. We

reduce light, noise, waste, and pollution that threaten species around our hotel and support conservation initiatives. We also provide guests with clear information and guidance on protecting biodiversity and interacting responsibly with local wildlife.


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Hotel Manager

September 2025

EMPLOYEE POLICY

Sunprime Protaras Beach Hotel is committed in respecting, developing and providing opportunities to its employees. In addition, their welfare, health and safety are of great importance.

The hotel treats fairly and with respect everybody irrespective of their sexuality, gender, age, ethnicity, religion or disability.

Sunprime Protaras Beach Hotel provides training development to all employees, a performance evaluation system and equal opportunities for advancement.

We act within the National labour legislation and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and we respect collective agreement, employment contracts, minimum salaries, work shifts and the working environment.



Hotel Manager

September 2025

CORPORATE SOCIAL RESPONSIBILITY POLICY

Sunprime Protaras Beach Hotel is committed to making a meaningful impact through Corporate Social Responsibility (CSR) and contributing to a sustainable future. We are dedicated to upholding the legal, ethical, and social standards outlined in this policy while embracing our global responsibility as a positive force. This commitment is further demonstrated by our alignment with the Social Corporate Responsibility Management System standard of the Republic of Cyprus. Senior management fully supports this policy and provides all necessary resources to fulfill our CSR commitments effectively.

Sunprime is committed to implementing the six principles of corporate social responsibility, which are as follows:

Accountability
Transparency
Ethical Behaviour
Respect for Stakeholder Interests
Respect for the Rule of Law
Respect for Human Rights and International Norms of Behaviour

Our dedication to responsible and sustainable business practices benefits not only our colleagues but also the local community, contributing to our long-term success.

Corporate Social Responsibility Objectives

In pursuit of these goals, we have aligned our corporate social responsibility objectives with the United Nations Sustainable Development Goals (SDGs). By integrating these global goals into our operations, we aim to contribute to the broader efforts for peace, prosperity, and environmental sustainability:

- ❖ SDG 1: No Poverty
- ❖ SDG 3: Good Health and Wellbeing
- ❖ SDG 5: Gender Equality
- ❖ SDG 8: Decent Work and Economic Growth
- ❖ SDG 10: Reduced Inequalities
- ❖ SDG 11: Sustainable Cities and Communities
- ❖ SDG 12: Responsible Consumption and Production
- ❖ SDG 16: Peace, Justice, and Strong Institutions
- ❖ SDG 17: Partnerships for the Goals

a) Acting with Honesty and Integrity

We conduct all our operations with honesty, fairness, and ethics, ensuring full compliance with applicable laws. We take a zero-tolerance stance on bribery and corruption and employ clear accountability mechanisms to monitor and report compliance.

We expect managerial officers to set the right example and lead by the principles outlined in our organizational policies and procedures. Furthermore, we require all associates to uphold legal obligations, ethical standards, and business conduct principles.

b) Supporting Human Rights and Human Dignity

We are committed to protecting and promoting human rights in accordance with the United Nations Universal Declaration of Human Rights, regardless of gender, age, disability, ethnicity, religion, beliefs, marital status, or sexual orientation. We oppose all forms of commercial, sexual, or other exploitation and harassment.

We prioritize the welfare of vulnerable individuals in our community, particularly those affected by poverty, exploitation, and abuse. Our commitment extends to protecting children from abuse, neglect, and exploitation and ensuring our business practices are free from child labour.

c) Providing a Fair and Safe Workplace

We emphasize diversity, inclusion, and mutual respect, fostering equal employment opportunities and a constructive work environment for all associates. We adhere to all applicable laws that protect employees from discrimination based on race, colour, religion, gender, sexual orientation, gender identity, national origin, age, disability, or other protected categories.

We strive to create a safe and harassment-free workplace for our associates and provide a secure, welcoming environment for our guests. Our commitment includes ongoing risk assessments and the development of crisis management plans.

d) Creating opportunities

We are committed to providing development and career growth opportunities to our associates and encouraging their active participation in the hotel's success. This includes offering training and coaching on various topics, including employment rights, equal opportunities, quality, health and safety, environmental sustainability, and more.

e) Working for the Good of the Community

We support the local community through financial or in-kind donations that enhance the lives of those in need, assist local non-governmental organizations, protect the environment, and preserve local culture and traditions. We encourage both our colleagues and guests to participate in volunteer efforts to make a positive impact.

We actively promote and respect the culture, traditions, and intellectual property of the local community and ensure their views are considered in our decision-making. We also strive to

promote the Protaras area and Cyprus to guests, inviting them to explore the region's rich history, culture, food, and wine.

We engage in sustainable tourism planning and management and collaborate with local and ethical vendors and suppliers. We also uphold animal welfare standards endorsed by the World Organization for Animal Health.

As part of the policy, we are committed to continuous improvement by setting and evaluating CSR objectives and the implementation programs that support them in a regular manner (at least annually). With our concrete, measurable, and transparent goals, we can actively contribute to our society, embed sustainability across the organization, hold ourselves accountable, continually improve our performance and increase the resiliency of the communities where we do business.



2025

Hotel Manager

September

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

The Sunprime Protaras Beach Hotel is committed to maintaining the highest level of integrity and ethical standards in all business dealings. This policy outlines the hotel's zero-tolerance approach to bribery and corruption and establishes guidelines for ensuring compliance with legal obligations and ethical practices.

This policy applies to all employees of Sunprime, including full-time, part-time, temporary, and contracted employees, without exception. It also applies to third parties representing or acting on behalf of the hotel.

a) Definitions

Bribery: The offering, giving, receiving, or soliciting of anything of value to influence business outcomes or decisions unfairly.

Corruption: Abuse of power or position for private gain, typically involving bribery.

Gift: Any item of value, including money, goods, services, or favors, given or received without an obligation or expectation of return.

Hospitality: Meals, entertainment, travel, or accommodations provided or received as part of business interactions.

Facilitation Payments: Small payments made to expedite routine administrative tasks performed by public officials (e.g., issuing permits).

b) Statement

Sunprime strictly prohibits offering, giving, receiving, or soliciting bribes in any form. The hotel acknowledges that bribery goes against the core values of integrity, equal opportunity, and fair treatment, which form the foundation of our workplace culture.

Employees are expected to comply with Cypriot laws, as well as international regulations, concerning bribery and corruption. Any employee found to be involved in bribery or corruption will face disciplinary action, including termination of employment. The hotel will also cooperate fully with law enforcement in investigating and prosecuting such offenses.

Employees must never accept or offer a gift or hospitality that could compromise, or appear to compromise, their ethical values of integrity and fair treatment in their business choices and decisions.

To ensure the highest level of ethical behaviour, the following actions are strictly prohibited:

- Offering, giving, or receiving any form of bribe, whether monetary or non-monetary.

- Promising, soliciting, or accepting gifts or hospitality in exchange for preferential treatment.
- Using Company assets or resources to influence a public official or a business decision unlawfully.
- Participating in or condoning corrupt activities, such as facilitation payments.

Please keep in mind that employees should exercise sound judgement and must avoid situations where their actions could be perceived as corrupt, even if no improper intent exists.

c) Gifts and hospitality

Employees must remain mindful of ethical implications. To avoid placing themselves or the hotel in a vulnerable position, employees must consider the following:

Is the gift appropriate or inappropriate?

Could the gift be considered a bribe?

The timing of gifts is particularly important. If a gift is offered or accepted before, during, or immediately after business negotiations, it may be viewed as an attempt to influence business decisions and could be classified as bribery.

As representatives of Sunprime, employees must never, directly or indirectly, accept, offer, or solicit gifts from current, past, or prospective business partners, clients, suppliers, competitors, or colleagues in situations where it might place them under obligation or could reasonably be seen as influencing business decisions.

If you are uncertain about whether a gift or contribution is appropriate, please seek guidance from your H.O.D. or a member of the management team.

d) Third-party collaborations

Third-party contractors, agents, and representatives must comply with this Anti-Bribery and Anti-Corruption Policy and adhere to the same ethical standards as hotel employees. Sunprime prohibits third parties from engaging in bribery or corrupt activities on its behalf. Employees must ensure that all third-party relationships are transparent, compliant with applicable laws, and documented appropriately.

e) Reporting and investigation

Employees are encouraged to report any suspected bribery or corruption, whether involving internal employees or third parties.

Reports should be directed to the employee's H.O.D or a member to of the management team without unreasonable delay. All reports will be treated confidentially, and no retaliation will be permitted against any employee who raises a concern in good faith.

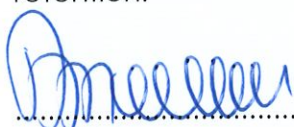
The hotel will promptly investigate all reported incidents and take disciplinary action where necessary, including termination of employment. The hotel will also cooperate fully with law enforcement agencies in prosecuting any violations of this policy.

f) Training and awareness

Sunprime is committed to preventing bribery and corruption by providing regular training sessions to all employees. These sessions will cover the principles of the Anti-Bribery and Anti-Corruption Policy, highlight the legal and ethical implications of bribery and corruption, and explain how to identify and avoid potential risks. Employees will also be informed about how to report misconduct and what protections are available to them.

g) Confidentiality

All information related to incidents of bribery or corruption and related disclosures will be treated as confidential. Information will be securely retained and deleted within three (3) months after the resolution of any case unless legal or disciplinary action requires its continued retention.


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Hotel Manager

September 2025

HUMAN RIGHTS AND CHILD PROTECTION POLICY

Sunprime Protaras Beach Hotel respects international human rights principles aimed at promoting and protecting human rights as defined by the United Nations Declaration of Human Rights and the United Nations Convention on the Rights of the Child.

This acknowledgment remains aligned with our employee, community, environmental and health & safety policies. In all cases we will engage and communicate with involved stakeholders to promote and improve human rights principles.

We treat everybody without discrimination, with dignity, fairness and respect. We ensure that data protection and privacy for all individuals is in effect.

Management protects children from all forms of abuse including illegal employment, child labor, forced or compulsory labor and sexual exploitation. It has set procedures when a child's welfare may be at risk, and such actions will be reported to the police authorities. Furthermore, the welfare authorities will be informed for all suspicious activities regarding children whether by employees, guests or other people.

The hotel works to reduce the possibility of child exploitation and abuse and trains its employees on their obligations. It will not knowingly employ or engage directly or indirectly with anyone who poses an unacceptable risk to children.


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Hotel Manager

September 2025

HARASSMENT AND SEXUAL HARASSMENT POLICY

Sunprime Protaras Beach Hotel is committed to providing a work environment that is free from all forms of harassment and sexual harassment. This policy aims to prevent harassment of any form in the workplace, provide a clear process for reporting and addressing complaints, and outline the consequences of engaging in such behaviour.

This policy applies to all employees, contractors, interns, volunteers, clients, vendors, and any other individuals interacting with Sunprime. This policy covers harassment and sexual Harassment occurring in the workplace, during work time, any hotel activities, or occurring outside hotel premises, but materially or negatively affects the hotel's work environment or operations.

1) Definitions

Harassment: Any behavior, whether direct or indirect, verbal or non-verbal, that is perceived by the receiver to be threatening, patronizing, demeaning thus creating an intimidating, humiliating and hostile working environment. Harassment is any unwelcome conduct based on race, color, religion, sex (including pregnancy), national origin, age, disability, sexual orientation, gender identity, or any other characteristic protected by law. Such harassment may be an isolated incident or a series of repeated actions.

Sexual Harassment: Sexual harassment includes unwelcome sexual advances, requests for sexual favors or physical contact of a sexual nature when:

- Submission to the conduct is made either implicitly or explicitly a condition of the individual's employment.
- Submission to or rejection of conduct is used as the basis for an employment decision affecting the harassed colleague.
- Harassment has the purpose or effect of unreasonably interfering with the colleague's work performance or creating an intimidating, hostile or offensive working environment for the colleague.

Harassment and Sexual Harassment can take many forms, including but not limited to:

- Verbal
- Non-Verbal
- Physical
- Online/Electronic

b) Statement

Sunprime holds zero tolerance against all forms of harassment and sexual harassment. Employees and other individuals interacting with Sunprime are expected to strictly adhere to

this policy and the Cypriot legislation provisions to ensure a safe and professional working environment.

Employees who are found to have harassed and/or sexually harassed another individual, who interfere with the resolution of any harassment and/or sexual harassment complaint, retaliate against an individual for filing a harassment and/or sexual harassment complaint, or file an unfounded harassment and/or sexual harassment complaint intended to cause harm, may face disciplinary action, up to and including termination of employment. The severity of the disciplinary action will depend on the circumstances and the nature of the violation.

Non-employees (e.g., clients, vendors) who violate this policy may be subject to consequences, including termination of contracts or business relationships.

All reports and cases will be kept confidential, except as required by law.

c) Reporting procedure

The workforce should be vigilant to report any suspected violations of this policy, as well as promoting a responsible and positive organizational culture.

Colleagues can report concerns to the:

- Direct H.O.D.
- Health & Safety appointed Officer
- Members of top management (General Manager, managers)

Reports should include a clear explanation of the issue and any relevant details that may be of help. When making a report, the employee should provide as much detail as possible, including the names of the individuals involved, the nature of the conduct, dates, times, and any witnesses.

Victimization of a reporter is not acceptable and any form of retaliation against the reporter or colleagues of the reporter will not be tolerated.

d) Investigation

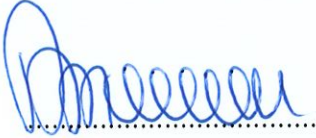
All reports of harassment and/or sexual harassment will be taken seriously and investigated promptly, thoroughly, and impartially. Reports will be acknowledged within seven (7) days.

The complaint does not need to provide evidence for the employer to investigate the concerns raised. A thorough and impartial investigation will be conducted to assess the validity of the claim. All information related to the report and investigation will be kept confidential to the fullest extent possible.

If the report is substantiated, appropriate corrective actions will be taken. The investigation will conclude with a determination of whether the policy was violated. Both the complainant and the alleged harasser will be informed of the outcome without unreasonable delay.

e) Confidentiality

All information related to harassment and sexual harassment, as well as any related disclosures, will be treated as confidential and retained securely except as required by law. Personal data will be deleted within three (3) months of the closure of any active case unless involved in ongoing legal or disciplinary proceedings.


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Hotel Manager

September 2025

HEALTH AND SAFETY POLICY

The minimization of health and safety hazards is of prime concern to the management of Sunprime Protaras Beach Hotel.

To achieve the above, we have set the following priorities:

- To protect the life and health of employees, clients, suppliers, contractors and other third parties who are affected by our operations;
- To protect the environment;
- To avoid damages at facilities and equipment;
- To minimize incidents which affect health and the environment;
- To develop a health and safety sensitive culture.

We are using the following tools:

1. A written risk assessment study for all hotel's operations;
2. A health and safety management system;
3. An authorized and competent management employee for supervising health and safety;
4. Health and safety committee;
5. An updated health and safety file;
6. Experienced personnel;
7. Health and safety training;
8. Efficient communication;
9. Safe hotel premises;
10. Reliable equipment, tools and personal protective equipment;
11. Qualified First Aiders and equipped first aid kits;
12. Fire safety equipment;
13. Collaboration with competent suppliers and contractors.

In addition, we maintain a crisis management system to protect guests, employees, and assets. We identify and assess risks, keep up-to-date emergency responses and train employees with regular drills. Clear roles, communication protocols, and stakeholder coordination guide our response. We comply with legal requirements, record and review all incidents, and continually improve our readiness based on lessons learned.

We commit to implementing all health and safety legislation and strive to improve our health and safety performance. Occupational health and safety concern all employees and therefore this policy should be followed by everybody.


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Hotel Manager

September 2025