

SUSTAINABILITY REPORT 2024

CONSOLIDATING THE PATH,
MOVING FORWARD WITH IMPACT

Pestana International Holdings S.A.



ABOUT THE REPORT

The 2024 Sustainability Report of Pestana International Holdings S.A. (referred to in this document as Pestana Hotel Group or the Group) presents the activities carried out within the Environmental, Social, and Governance (ESG) dimensions between January 1 and December 31, 2024.

This report reflects the consolidation of a sustainability journey that the Group has been developing over the last years, strengthened in 2023 with the beginning of the implementation of reporting processes aligned with the principles of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

If 2023 represented a year of transition and preparation, 2024 was a year of greater maturity, during which the Group reinforced internal mechanisms for data collection, analysis, and reporting. The result is a more structured and consistent document that transforms data into useful knowledge, fostering transparency, dialogue, and continuous improvement.

In the context of recent European legislative developments, the report already incorporates some of the simplifications foreseen in the Omnibus Directive, which, at the time of drafting this document, was still at the proposal stage. Although the legislative text has not yet been formally approved, the European Union's decision to apply the "stop the clock" mechanism suspended the mandatory reporting requirements under the CSRD, allowing for an additional period of adaptation to the new obligations. Consequently, the Group's 2024 Sustainability Report does not yet constitute its first mandatory report under the new legislation, but it aligns closer with CSRD requirements, integrating several of the simplifications proposed under the Omnibus Directive. This represents an exercise in anticipation and preparation, ensuring a solid and informed transition to the new European reporting framework.

Between 2023 and 2024, the reporting structure was revised to include only companies within the PIH consolidation perimeter, meaning entities in which PIH exercises majority control.

The structure of the report follows the ESG dimensions and includes a section on consolidated indicators and results, as well as future commitments guiding the Group's continuous evolution.

Thus, the 2024 Report reflects not only the performance achieved but also a consistent and transparent path toward future alignment with sector expectations, stakeholder priorities, and European sustainability requirements.

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REPORT MANIFESTO

One of the core values of Pestana Hotel Group is Be Conscious, a principle that shapes how the Group approaches sustainability and social responsibility. This commitment takes shape through Planet Guest the Pestana Hotel Group's sustainability programme, which brings together its environmental, social and governance initiatives under a single framework. It reflects our belief that we are only guests of the planet, and that our responsibility is to contribute actively to its preservation while supporting the wellbeing of the communities where we operate.

This 2024 Sustainability Report reflects the consolidation of a sustainability journey that the Group has been pursuing since 2008, reinforced in 2023 with the start of the implementation of reporting processes aligned with the principles of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

Compared with previous years, the 2024 Report offers greater depth, primarily due to the strengthening of internal data collection and analysis mechanisms. The result is a more structured and consistent document that transforms data into useful knowledge, promoting transparency, dialogue and continuous improvement.

Thus, the 2024 Report better reflects not only the performance achieved but also a more secure path towards upholding the values of the Pestana Hotel Group, greater alignment with future trends and industry expectations, as well as with the priorities of stakeholders and European sustainability requirements.

Moving forward with impact means ensuring that our growth is aligned with a clear purpose: caring for people, protecting the planet, and contributing to the long-term sustainability of the destinations and the communities where we operate. It is about turning commitment into consistent action and ambition into measurable progress. This motto precisely captures this moment: we consolidate what has been prepared – with strategy, indicators, and clarity – moving forward to generate real impact.

MESSAGE OF THE PRESIDENT

In 2024, Pestana Hotel Group achieved strong operational and financial results, despite the uncertainty, unpredictability and increased volatility that characterized the year, driven by the geopolitical challenges the world continues to face.

In this context, Southern Europe destinations continued to strengthen their position as competitive and highly attractive markets, supported by their authenticity, cultural and climatic strengths, and the beauty of their natural landscapes, with Portugal standing out as one of the leading destinations. Grounded in our strategic roadmap, sustainability remains a top priority, and we remain focused on delivering “the time of your life” to our guests, while leading the transition of the tourism sector and minimizing our impact on both the planet and the communities we serve. From an Environmental perspective, and building on the energy efficiency and consumption reduction initiatives implemented in previous years, aligned with our five pillars: energy, water, sourcing, waste and mobility, we have further expanded our scope. Key milestones include the creation of an energy community with photovoltaic panels serving seven hotels in Alvor, in Algarve (Portugal) as well as the use of alternative water sources, including the reactivation of the Algarve desalination plant and the use of Wastewater Treatment Plant (WTP) for golf course irrigation. Despite the growth in hotel operations, the sustained investments in energy efficiency projects in recent years resulted in an almost 39% reduction in emissions per room night between 2019 and 2024. At the Social level, Pestana Hotel Group maintains an active commitment to the sustainable development of the communities where it operates, promoting local engagement, heritage preservation, and the strengthening of regional economies, with a particular focus on the “Obrigado por Ajudar” programme implemented across all hotels. We believe that our true competitive advantage lies in our people. For this reason, employee engagement and development, wellbeing, inclusive opportunities, and attractive working conditions remain a top priority across all geographies and business areas. In 2024 we achieved our highest employee satisfaction result since 2017 of 79,4%.

From a governance perspective, the Group is advancing its sustainability reporting framework, aligned with the requirements defined by the European Union, while continuing to enhance its internal processes and overall level of transparency and accountability.

Sustainability is only possible through collective effort, and we remain committed to ensuring that it fully integrate into how we operate and grow.

2024 IN RETROSPECTIVE



651,5 M€ Revenue 110 units in operation 16 countries	11 653 rooms 69,9% average occupancy rate	4.328 Employees*   2.536 1.792
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* Excluding trainees

HIGHLIGHTS

ACQUISITIONS

- Pestana Orlando Suites – Lake Buena Vista
- Quinta Perestrello in Funchal

RENOVATIONS

- Completion of the renovation of Pestana Blue Alvor Beach (formerly Pestana Delfim).
- Completion of the refurbishment of Pestana Vila Lido Madeira Ocean Hotel (formerly Pestana Palms)
- Ongoing construction of Pestana Dunas, a new unit in Porto Santo, is expected to be completed in 2026.

RIGHTS OF USE

- New right of use for the Pestana Porto – A Brasileira hotel, effective 1 June 2024, for a period of 15 years.
- Renewal of the Pestana Cascais and Pestana Sintra Golf right-of-use contracts for an additional five years.

PESTANA WELLBEING

The Group launched the Pestana Wellbeing program, reinforcing its commitment to employee well-being and health. This program addresses the importance of physical, emotional, social, professional, and financial well-being, which is reflected in improved performance among our people.

A NEW ERA IN DIGITAL TRANSFORMATION WITH OPERA CLOUD

Pestana Hotel Group began implementing OPERA Cloud, a global hospitality management solution that enhances connectivity, automates processes and improves the experience of both employees and guests.

The rollout has already reached several regions, bringing visible operational improvements.

ADVANCING OUR ENVIRONMENTAL COMMITMENT

In 2024, the Group advanced its environmental strategy by increasing on-site renewable generation with photovoltaic systems, expanding best-practice energy procedures and progressing the transition to an electric and hybrid fleet. In water management, it achieved the “Save Water” label in 12 Algarve units, with strategies to reduce water consumption. The Group also strengthened circularity with more focused waste management actions.

TRAVELLER REVIEW AWARDS

PHG was recognised as Portugal's Most Awarded Hotel Chain in the Traveller Review Awards.

RANKING MERCO 2024

Pestana Hotel Group maintained 1st place in the tourism sector and achieved 5th place overall in the Merco ranking, which highlights the companies with the best reputation in Portugal.

TRIPADVISORS TRAVELLER'S CHOICE AWARDS

This year, Tripadvisor presented the Travellers' Choice Awards to more than 50 of our hotels in Portugal. Two units in Guimarães – the Pousada Mosteiro Guimarães and the Pousada da Ria – received the Best of the Best distinction. Tripadvisor also highlighted the Group's excellent and consistent service.

1.
PESTANA:
A LEADING GROUP FOR
OVER 50 YEARS

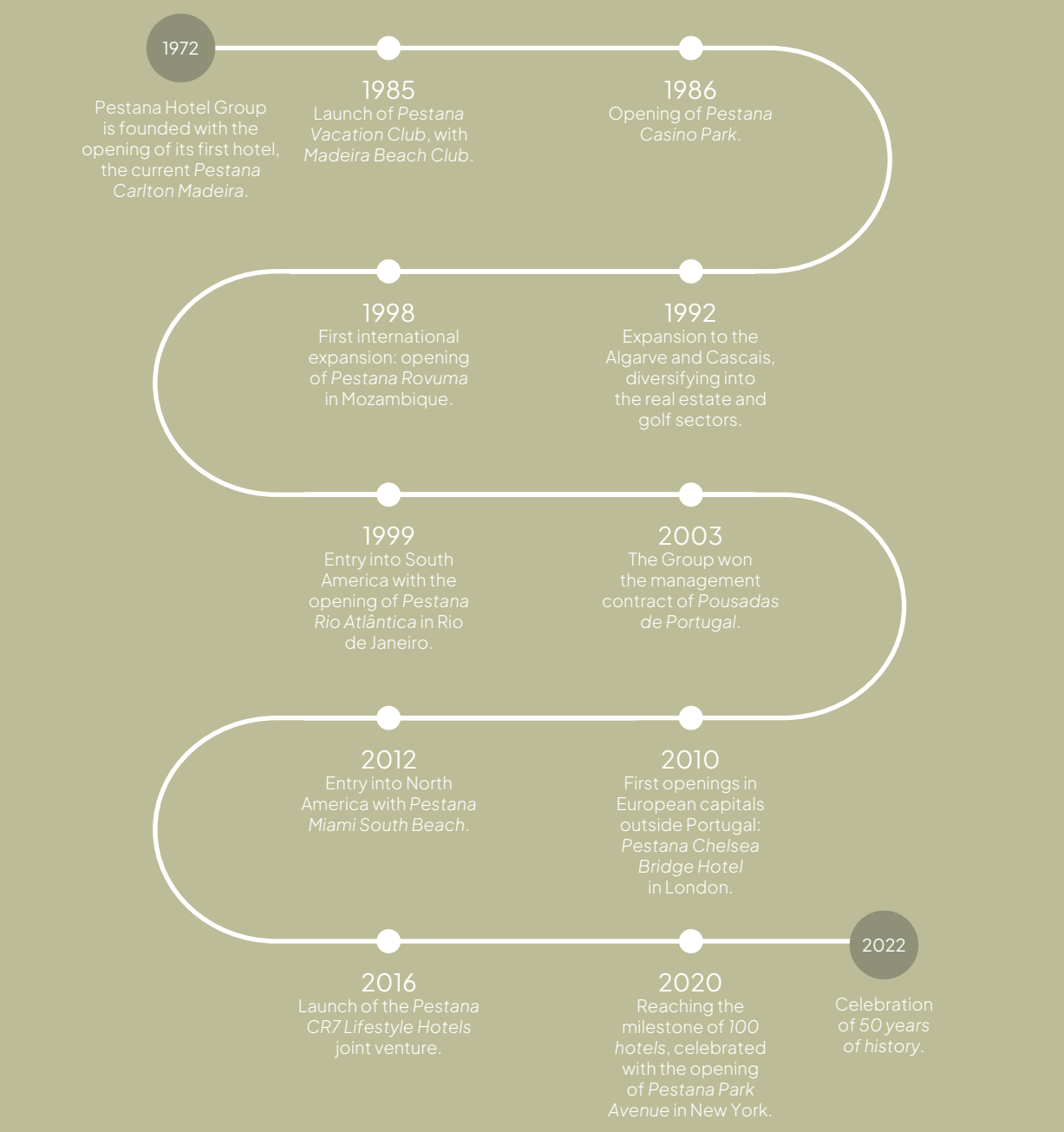


PESTANA: A LEADING GROUP FOR OVER 50 YEARS

“Rooted in tradition and driven by innovation, Pestana Hotel Group embraces sustainability as a guiding principle, shaping a hospitality experience that respects people, communities, and the planet.”

1.1. PESTANA HOTEL GROUP HISTORY

With over 50 years of history, Pestana Hotel Group was born in Madeira and grew from an island resort into the largest multinational hotel Group of Portuguese origin. It consolidated its leadership in Portugal, diversified into areas such as real estate, golf, entertainment and beverages, and expanded beyond borders to Africa, America, and Europe. The strong commitment to sustainability and innovation today reinforce the Group’s position as a benchmark in tourism, hospitality, and leisure.



1.2. PESTANA UNIVERSE

Throughout its history, the Group has diversified beyond the hotel industry, expanding into complementary business areas such as real estate, golf, entertainment and beverages, which strengthen its international presence and ensure a sustainable and integrated growth model.

HOSPITALITY

The Group's core business, including leisure, lifestyle, heritage, and luxury segments, focuses on service quality and authentic experiences.

Within its core hospitality segment, Pestana Hotel Group operates through four distinct brands: Pestana Hotels & Resorts, Pestana Collection Hotels, Pousadas de Portugal, and Pestana CR7 Lifestyle Hotels.



PESTANA HOTELS & RESORTS

Cosmopolitan Hotels & Paradise Resorts

Worldwide gorgeous resort sites, smart urban locations. A portfolio of more than 50 sophisticated four and five-star hotels located across 3 continents: Europe, Africa and America.



POUSADAS DE PORTUGAL

Unique Portuguese Heritage hotels

The Pestana Pousadas de Portugal offers the ultimate immersive Portuguese experience in some of the country's most historical and iconic properties, be those castles, palaces, forts, monasteries and convents. Authentically Portuguese at heart, the management of an initial network of 37 Heritage hotels was sub-conceded by the Portuguese Government to Pestana Hotel Group in 2003, with the portfolio evolving over time, reflecting changes to its composition and the development of additional properties under the brand.



PESTANA CR7 LIFESTYLE HOTELS

Vibrant. Exclusive. Urban. Unique.

The new lifestyle brand, the perfect match between Pestana's hotelier expertise and Cristiano Ronaldo (CR7) lifestyle, targeting the millennial segment. Individual and stylish in exceptional locations, Funchal, Lisbon, Madrid, New York and Marrakech.



PESTANA COLLECTION HOTELS

The Deluxe Selection

An award-winning selection of 7 properties showcasing the very best in Portuguese, Netherlands and Spanish hospitality. Located in Lisbon, Cascais, Porto, Amsterdam and Madrid all properties are luxurious buildings and monuments, located in prime locations. Hidden treasures in plain sight that offer unique and enriching experiences in astonishing historical properties.



VACATION CLUB

Represents the timeshare business, which allows customers to purchase the right to enjoy holidays in the Group's units during specific periods, promoting customer loyalty.



REAL ESTATE

The Pestana Residences brand combines real estate investment with hotel services, offering properties in prime locations such as Algarve and the Alentejo Coast.



GOLF

High-quality golf courses that strengthen tourism appeal, particularly in the Algarve, helping to mitigate seasonality and stimulate the local economy.



ENTERTAINMENT

This area includes the management of casinos and leisure facilities, especially in Madeira, enhancing the Group's overall tourism offering.



BEVERAGE INDUSTRY

An industrial unit in Madeira producing well-known brands, reinforcing the connection between local heritage and the tourism offering.

1.3. IDENTITY AND PURPOSE

“It’s the people who make de experiences memorable.”

Mission/ Purpose

Provide memorable experiences that create value for our clients.

Vision

Be a trusted brand offering unique experiences.

Values



Be Collaborative – People Development

We bet on our talent and embrace each opportunity as a way to develop ourselves personally and professionally.

We value diversity and inclusion by promoting a culture of collaboration and open communication where different viewpoints are key to achieve better results.



Be Passionate – Client Focus

We know that each client is unique and special therefore we strive to know the client so well we are able to anticipate his/her needs by offering memorable experiences in a familiar and trustful environment.

We give our best to the Group and live its mission as our own.



Be Efficient – Performance Driven

We recognize that success comes from meeting our individual and collective goals and efficiently finding solutions, maintaining the excellent and rigorous high standards of our services.

We promote a culture of continuous feedback, valuing everyone’s contributions and praising the achievements of the people around us.



Be Conscious – Sustainability

We embrace the future consciously without ever forgetting that our history has transformed us into the consistent Group that we are today, keeping in mind a solid financial basis that enables the prosperity and the sustained growth of our brand in the long term.

We always remember that we are the guests of the planet and commit ourselves every day to improve our community and contribute to a more sustainable world, acting with integrity, ethics and passion.



Be Agile – Transformation

We look forward to the challenges that the industry brings, without fearing taking risks and breaking paradigms. We are agile in our daily routine, valuing mobility and flexibility.

We continuously seek to innovate, valuing different ways of working and being.

2. SUSTAINABILITY: PESTANA HOTEL GROUP'S APPROACH

[ESRS 2]

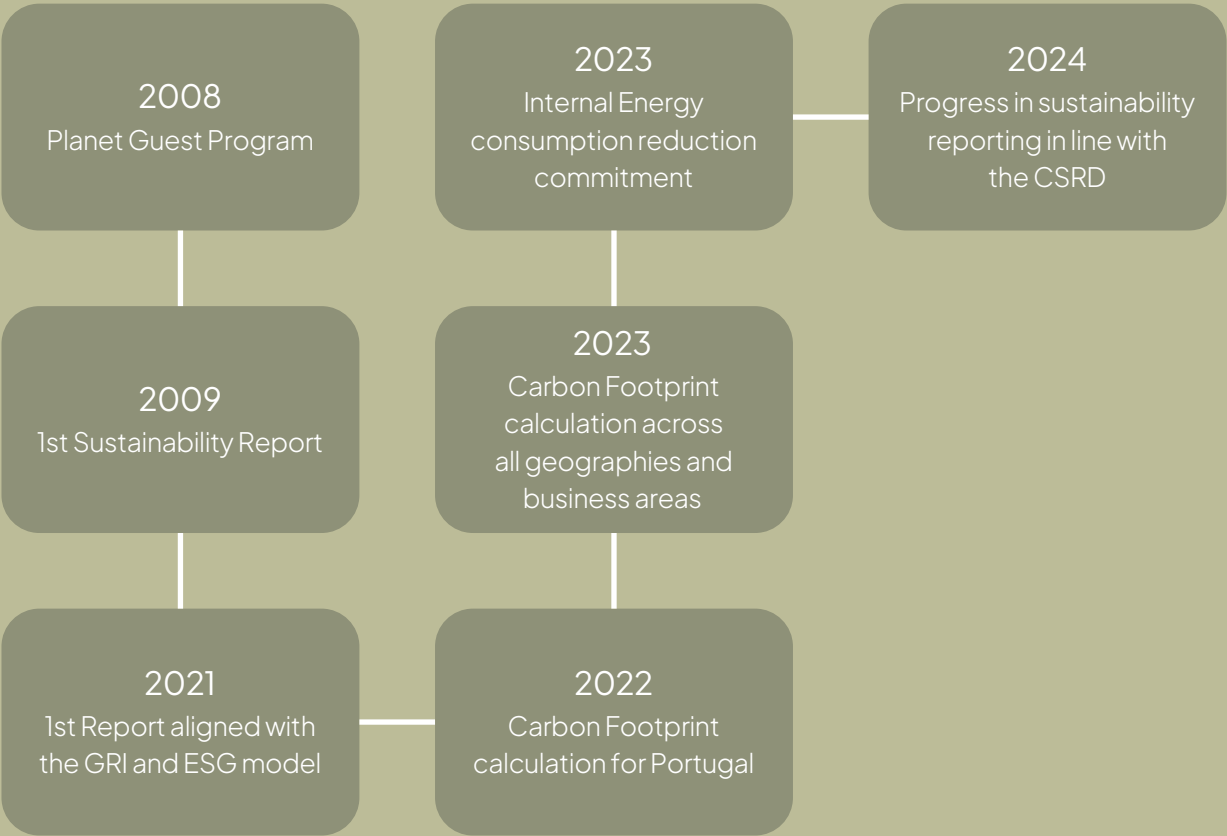


SUSTAINABILITY: PESTANA HOTEL GROUP'S APPROACH

“Sustainability is a cross-cutting commitment within all areas of Pestana Hotel Group.”

2.1. SUSTAINABILITY JOURNEY

Throughout its more than 50-year history, the Group has achieved several milestones that represent its sustainability journey.



2.2. SUSTAINABILITY GOVERNANCE

[SBM-3] [GOV-1] [GOV-2] [GOV-5]

The sustainability governance model of Pestana Hotel Group is based on a stable structure that ensures the integration of sustainability topics into the Group’s strategic and operational decisions.

The cross-functional coordination between the various areas continues to guarantee a cohesive and consistent approach, reflecting the Group’s commitment to responsible and sustainable management, implemented under the Planet Guest program.

Ultimate responsibility for sustainability lies with members of the Board of Directors of Pestana International Holdings S.A., which oversees and evaluates strategic investments in this area.

The Executive Committee plays a central role in this model, being responsible for approving plans and roadmaps for initiatives aimed at preventing and mitigating impacts on people and the environment, monitoring sustainability performance, validating material topics, and approving sustainability reporting.

Our employees are essential to our daily operations and play a key role in ensuring sustainability is integrated into everything we do.

This governance model ensures consistency, transparency, and continuous improvement in sustainability management, reinforcing stakeholder trust and contributing to long-term value creation.

2.3. STAKEHOLDERS

[SBM-2]

Pestana Hotel Group identifies the following as its main stakeholder groups:



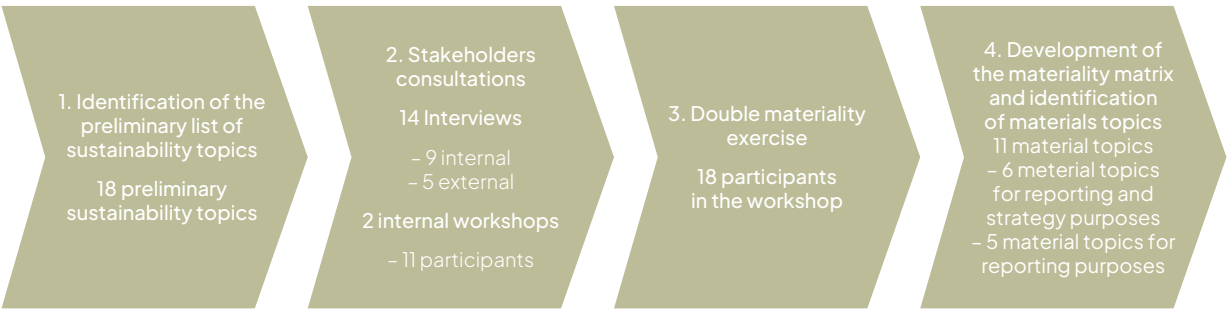
2.4. PRIORITIES

[IRO-I]

In line with the requirements of the CSRD Directive and ESRS, the Group conducted its double materiality assessment. This exercise aimed to identify and prioritize the sustainability topics most relevant to the Group’s activities, considering both the significant impacts of the organization on society and the environment (impact materiality) and the financial effects that ESG factors may have on the business’s performance, position, and outlook (financial materiality).

Methodology

The double materiality assessment followed the process below:



The process began with the identification of potential material topics, based on international frameworks such as the ESRS, the Global Reporting Initiative (GRI), and the United Nations Sustainable Development Goals (UN SDGs), along with sectoral benchmarks and regulatory trends, resulting in a preliminary list of 18 sustainability topics.

Following this initial selection, a stakeholder consultation was carried out, where both internal and external stakeholders shared their perspectives on the Group’s performance across the different sustainability dimensions. The consultation also served to define the final list of sustainability topics and to identify related impacts, risks, and opportunities (IROs), as summarized in the IROs table presented in IROs Tables, of this report. In total, 14 stakeholder interviews were conducted, complemented by two internal focus groups involving 11 employees.

Based on this information, the double materiality exercise was carried out, dividing participants into three groups corresponding to the ESG dimensions (environmental, social, and governance).

Each group evaluated the impacts, risks, and opportunities (IROs) using pre-defined criteria¹, considering both impact and financial perspectives. Through this evaluation, the most significant IROs for Pestana Hotel Group were identified, allowing the definition of priority material topics.

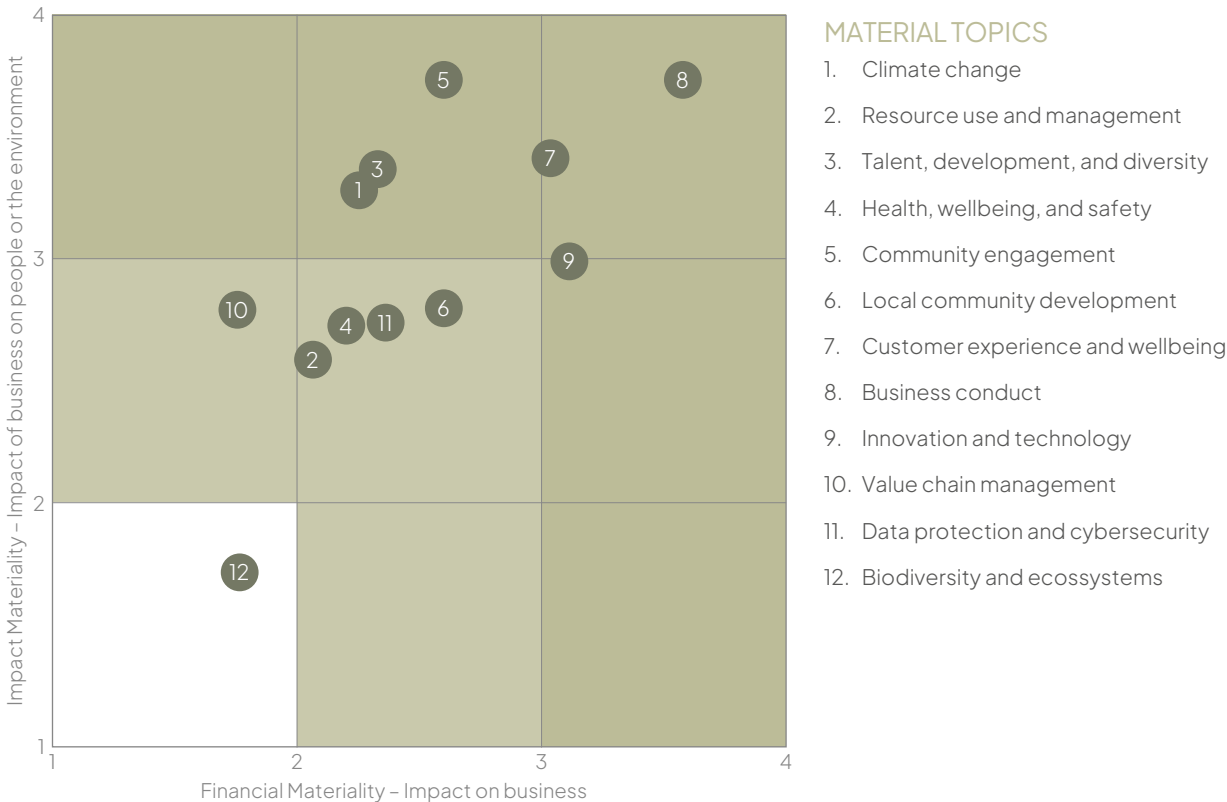
1. The impacts, risks and opportunities were assessed according to the following scale: 1–Negligible; 2–Moderate; 3–Significant; 4–Critical. Regarding the criteria, the assessment of impacts considered: scale (intensity/severity of the impact); scope (coverage/reach throughout the value chain); irremediable nature; and probability (in the case of potential positive and negative impacts). In assessing risks and opportunities (financial effects), the following were considered: magnitude (criticality of the risk or opportunity for the company, influence on cash flows, access to financing or cost of capital, quality, prices and commercial relationships); and probability (frequency of occurrence or probability of occurrence).

For the 16 sustainability topics considered material, a total of 80 impacts, 33 risks, and 45 opportunities were identified.

Results of the exercise

The assessment resulted in a preliminary version of the Materiality Matrix, which was later reviewed and validated together with the extended project team. This validation phase strengthened the organization’s internal perspective on the most relevant topics.

During this final stage, the project team proposed some changes to the naming of material topics and the aggregation of similar themes. As a result, nine topics were grouped into four, reducing the total number of material topics from sixteen to eleven.



All topics with a score above 3 in the Materiality Matrix were included not only in the sustainability report but also in the Group’s strategy, ensuring their integration into management and strategic planning.

The Materiality Matrix was presented to and validated by the Executive Committee, ensuring alignment between the identified priorities and management decisions, thus reinforcing the relevance and credibility of the materiality process within the sustainability governance model.

3. ESG PERFORMANCE



ESG PERFORMANCE

“Sustainability is a cross-cutting commitment within all areas of Pestana Hotel Group”

3.1. ENVIRONMENT: CARING FOR THE PLANET THAT WELCOMES US

“We are only Guests of the Planet.”

Environmental sustainability is part of the identity and organizational culture of Pestana Hotel Group, reflecting the awareness that preserving natural resources is essential for the future of communities and for the long-term success of the business itself. Guided by values of responsibility, efficiency, and commitment to future generations, the Group has consolidated a structured and integrated environmental management approach that covers energy, water, and materials, promoting emission reduction, rational resource use, and the transition toward a more circular economy, with direct impact on operations, guest experience, and employee engagement.

In 2024, the Group strengthened its actions across these three areas, achieving concrete and measurable results:

–In energy management, it presented the Greenhouse Gas (GHG) Emissions Reduction Action Plan and consolidated the implementation of the Best Practice Procedures for Energy Consumption, in place since 2023.

–In water management, the Group signed the Water Efficiency Commitment and implemented the “Save Water” label across 12 units in the Algarve, aligning with the 15% reduction target for the region.

–In circular economy, the Group consolidated integrated waste management, achieving a 15% reduction in total waste generation compared to 2023, while improving recycling and recovery rates.

These three dimensions, energy, water, and circularity, represent a shared vision of sustainability, oriented toward efficiency, innovation, and resilience. In parallel, the Group promoted awareness and training initiatives for both employees and guests, particularly in water management, strengthening collective awareness around water and marine resource conservation.

This commitment reflects the Group’s long-term vision: to act today with consciousness and responsibility to ensure that future generations can continue to enjoy a balanced and welcoming planet.

2024 IN NUMBERS

+ 17 self-consumption photovoltaic systems in hotels in 2024.	12 hotel units in the Algarve awarded the “Save Water” label	15% reduction in total waste
	2 composting pilots	4 desalination plants (São Tomé, Cape Verde, Porto Santo, Alvor)

HIGHLIGHTS

ENERGY EFFICIENCY AND ENERGY TRANSITION

Implementation of the Group’s Greenhouse Gas Emissions Reduction Action Plan and rollout of energy-efficiency best practices across operational and administrative areas. In 2024, on-site renewable generation was reinforced with photovoltaic systems, alongside the gradual replacement of fossil-fuel vehicles with electric and hybrid models, supported by employee training and communication campaigns to strengthen responsible energy use throughout hotel operations.

WATER EFFICIENCY AND EXTERNAL RECOGNITION

“Save Water” label awarded to 12 group units in the Algarve, following the Water Efficiency Commitment and the implementation of a 30-measure action plan. Water consumption reduction measures included flow reducers, automatic sensors and flow control systems, lawn area reduction, and irrigation optimization, supported by the adoption of efficient fittings (e.g., “A”-label/flow-reduced taps, showers and flush systems).

DESALINATION CAPACITY REINFORCEMENT

In 2024, the Group reactivated its fourth desalination unit in Alvor, increasing capacity to secure an alternative and sustainable water supply in water-stressed regions. The Group now operates four desalination plants across São Tomé, Cape Verde and Portugal (Algarve and Porto Santo), supporting irrigation of green areas and reducing pressure on local freshwater resources.

WASTE TRACKING AND PERFORMANCE MONITORING

In 2024, all Group units implemented a systematic waste registration system, enabling monthly monitoring of generated quantities and the assessment of recycling and recovery rates.

ORGANIC WASTE VALORISATION AND ON-SITE CIRCULARITY

Pilot projects for organic waste recovery were launched, including composting accelerators at Pestana Palace Lisboa and domestic composting at Pousada da Ria (Aveiro), strengthening circularity through on-site composting and reuse of compost in gardens and green areas.

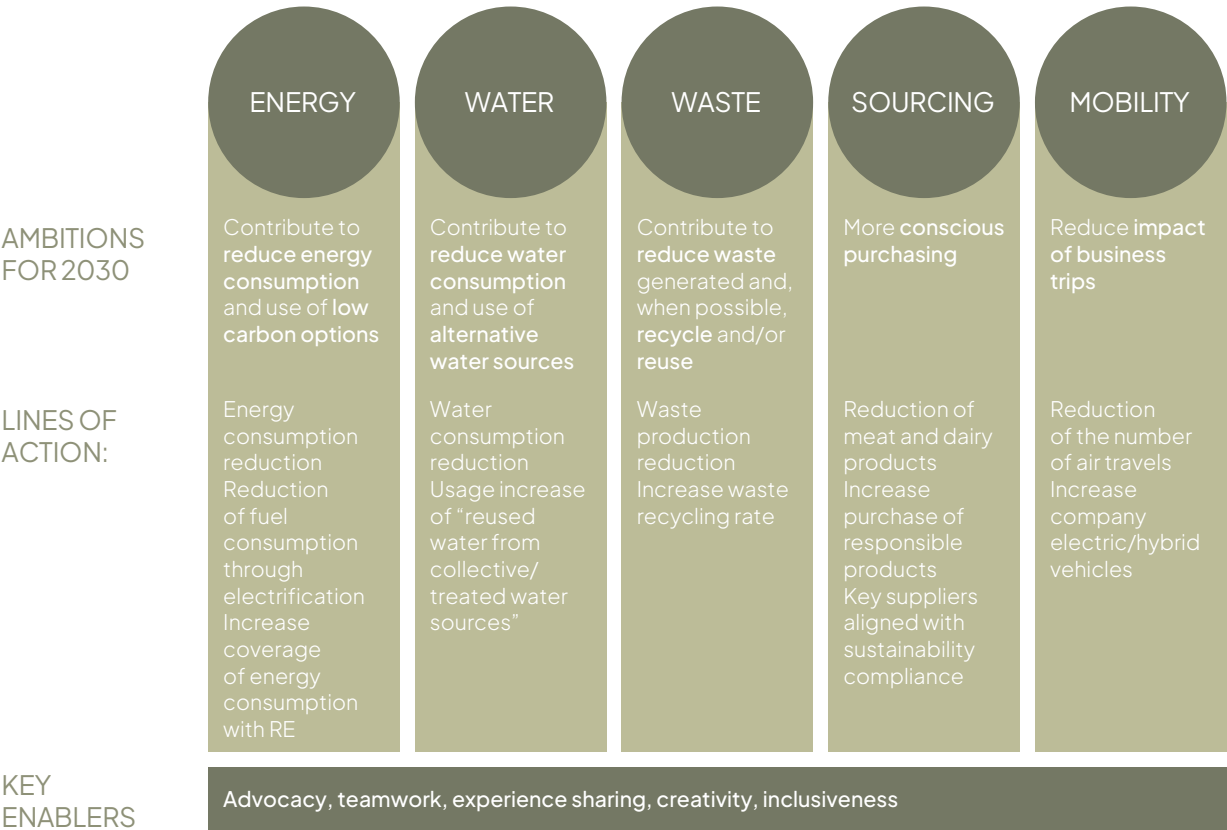
Climate Change

[ESRS E1]

Pestana Hotel Group has been strengthening its commitment to Climate Change Mitigation and Adaptation by implementing strategic and operational measures aimed at reducing its carbon footprint and promoting resource efficiency.

The Group’s aims to continue operating with the purpose of generating positive impacts related to climate change. The Group monitors and manages its internal energy consumption and seeks to increase energy consumption from renewable sources while reducing its energy consumption through energy efficiency gains overall. This approach also aims to manage and mitigate risks related to costs and investments arising from physical risks, investments arising from transition risks required by new legislation, to build business and value chain resilience through investment in infrastructure and the establishment of redundancies. At the same time, the Group identifies opportunities to enhance renewable energy production for self-consumption and to position itself differently in the market by adopting GHG mitigation practices. This approach is guided by the analysis of IROs, conducted in line with the CSRD’s double materiality principles, allowing the organisation to anticipate challenges and reinforce its resilience.

In 2024, the design of the *Action Plan for the Reduction of Greenhouse Gas (GHG) Emissions* was initiated, defining the lines of action to achieve targets to 2030. The plan is structured around five strategic pillars, each encompassing specific actions and objectives established using 2019 as the baseline year.



ENERGY AND EMISSIONS MANAGEMENT

Building on the progress achieved in the previous year, Pestana Hotel Group consolidated its efforts in energy efficiency and responsible resource management, reinforcing its climate mitigation and greenhouse gas (GHG) emissions reduction strategy. During 2024, the Group consolidated the implementation of Best Practice Procedures for Energy Consumption, implemented in 2023. The measures cover all the Group’s operational areas, such as Front Office, F&B, Housekeeping, Maintenance, Spas and Administration, and define specific behaviours and actions that each employee must adopt within their scope of activity, contributing to an internal culture of shared responsibility and continuous improvement:

FRONT OFFICE

- Supervise lighting and air conditioning in meeting rooms and unoccupied areas.
- Adjust lighting and air conditioning schedules according to occupancy.
- Group guests by floor/area to optimize consumption.

F&B

- Use appliances (washing machines, ovens, stoves) only when fully loaded.
- Manage refrigeration according to occupancy levels.
- Switch off appliances when not in use.

HOUSEKEEPING

- Set thermostats to predefined temperatures (summer/winter).
- Use natural lighting and ventilation during cleaning and tidying.

MAINTENANCE

- Sectorize equipment operation whenever possible.
- Check thermal power stations and hydropressors daily to detect leaks.
- Check pipe insulation and boiler and chiller efficiency monthly.
- Control thermostats, valves and air handling units (AHUs).
- Analyse consumption records and propose improvements.

SPAS AND GYMS

- Control water temperature (<26 °C) and ambient air temperature.
- Turn on saunas and Turkish baths only when necessary.
- Turn off sound systems and TVs in unoccupied areas.

ADMINISTRATIVE AREAS

- Switch off lighting when absent for more than 10 minutes.
- Switch off air conditioning during long periods of absence.
- Switch off monitors and computers during breaks and intervals.

The results demonstrate the effectiveness of the actions taken and the involvement of employees in adopting sustainable behaviours, resulting in a 4.5% reduction in total energy consumption and a 10.5% decrease in energy intensity per occupied room compared to 2023.

TOTAL ENERGY CONSUMPTION PESTANA HOTEL GROUP

2024

402.052 GJ

(-4.5% compared to 2023)

Hospitality

0,17 GJ/occupied room

(-10.5% compared to 2023)

The Group's activities recorded total energy consumption of 402.052 GJ, representing a reduction of around 3% compared to 2023. Electricity remains the main source of energy, accounting for the largest share of consumption. Around 3% of the electricity used was generated internally through photovoltaic systems installed at ECM and in several hotel units. The Group also has biomass systems, mainly at ECM and in 3 hotel units in the Azores and Madeira, which account for 9% of total energy consumption.

Regarding the various sources of energy used at Pestana Hotel Group, it is the hotel units that consume the most energy. Currently, the fleet accounts for only 3% of total energy consumption, with a gradual change in the fleet's emissions profile, with petrol consumption gaining ground over diesel. This change is justified by the Group's commitment to decarbonizing the fleet through the gradual replacement of diesel (-23% compared to 2023) and petrol (-1%) vehicles with lower emission vehicles, such as hybrid (+8%) and electric (+16%) vehicles, compared to the previous year.

DISTRIBUTION OF TOTAL ENERGY CONSUMPTION	2024	2023
Electricity	62%	59%
From the electrical grid	59%	57%
Solar photovoltaic production (self-consumption)	3%	2%
Fossil fuels	29%	32%
Natural Gas	13%	14%
GPL	11%	12%
Diesel	4%	6%
Petrol	1%	1%
Renewable sources	12%	11%
Biomass	9%	9%
Solar photovoltaic	3%	2%
BY BUSINESS		
Hospitality	82%	78%
Other businesses	18%	19%
RENEWABLE ENERGY		
Total	45.119 GJ	47.674 GJ

REDUCING THE CARBON FOOTPRINT

Pestana Hotel Group completed this year the third phase of its roadmap for measuring and managing its carbon footprint, covering for the first time all hotel units in the Americas and Africa, as well as in the beverages industry, thus completing the accounting of emissions from all geographical areas and business areas under the control of Pestana Internacional Holdings S.A.. This milestone represents the consolidation of the process begun in 2022 and reflects the commitment to systematic management of GHG emissions and the transition to a progressively decarbonized operation.

The calculation maintained the application of GHG Protocol methodologies, covering Scopes 1, 2 and 3:

- Scope 1 – direct emissions from sources controlled by the Group;
- Scope 2 – emissions associated with electricity purchased and consumed, and
- Scope 3 – indirect emissions throughout the value chain.

Based on the relevance assessment carried out, the categories of indirect emissions considered most significant were retained:

- Category 1 – Procurement of Goods and Services;
- Category 2 – Capital Goods;

- Category 3 – Energy-related Activities;
- Category 5 – Waste Generation in Operations;
- Category 6 – Business Travel;
- Category 7 – Employee Commuting;
- Category 9 – Downstream Transport and Distribution;
- Category 11 – Use of Sold Products;
- Category 12 – End-of-Life Treatment of Sold Products; and
- Category 13 – Downstream Disposed Assets.

Category 4 – Upstream Transport of Materials remained excluded due to the unavailability of consistent data, in line with the procedure adopted in the previous year.

TOTAL OPERATIONAL EMISSIONS

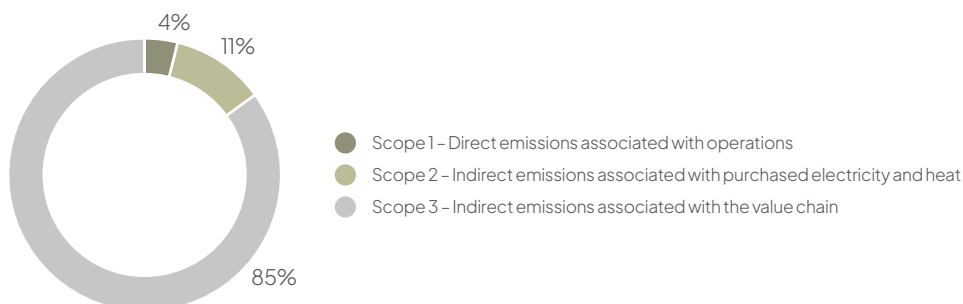
195.234 tCO₂e

(vs 172.162 tCO₂e in 2023)

S1 + S2 EMISSIONS

29.030 tCO₂e

(vs 28.351 tCO₂e in 2023)



Emissions tCO ₂ e	2024	2023	2022	2019
Scope 1 and 2	29.030	28.351	31.213	39.806
Reduction in emissions compared to 2019	27%	29%	22%	-

This year, Pestana Hotel Group total emissions were 195.234 tCO₂e, reflecting the growth of the Group's real estate area and the construction of new tourist developments. Despite the increase in activity, from 99 units in 2019 to 110 units in 2024, and, consequently, in total emissions, if we look only at Scope 1 and 2 emissions efforts to reduce the environmental impact have yielded significant results, with reductions of around 27%.

In hospitality, we can confirm the consistent trend of reducing emissions per occupied room in the period 2019–2024, highlighting the continuous improvements in the energy efficiency of hotel units and the impact of management measures implemented in recent years.

HOSPITALITY CARBON FOOTPRINT

PIH	2024	2023	2022	2019
Scope 1 and 2 (tCO ₂ e)	24.437	23.790	26.180	33.022
kgCO ₂ e/occupied room	10,49	10,85	12,43	17,09

Based on the consolidated results from 2019 to 2024, the Group now has a comprehensive and robust overview of its emissions, enabling it to target mitigation and energy efficiency actions more accurately.

INITIATIVES AND PROGRAMMES

SMARTROOMS

In 2024, the pilot project for automatic climate control in rooms continued, with the Pestana Casino Park, Pestana Carlton Madeira, Pestana Promenade, Pestana Douro and Pestana Palácio do Freixo units being included this year.

ALARMISTIC SIMAC

Consumption Monitoring and Alert System – The SIMAC project consists of installing sensors in equipment to identify deviations and potential problems, thereby ensuring that there is no loss of energy or water. Until the end of 2024 has been installed in 23 units.

EQUIPMENT FOR IMPROVED ENERGY EFFICIENCY

In 2015, the Group began a consistent investment in energy efficiency projects, totalling investments of €16 million by 2025. In 2024, the Group continued to invest in energy efficiency, such as replacing chillers, heat pumps and condensing boilers and electric charging stations. The commitment to installing photovoltaic panel systems on roofs and car parks continued, with the first energy community in Alvor, Algarve, being implemented serving 7 units.

INTEGRATED CONSUMPTION MONITORING

Since 2023, energy consumption has been monitored in an integrated system, with the aim of setting more effective reduction targets. That year, a target of a 15% reduction compared to 2022 consumption was set, with a special focus on the hotel and golf areas. This initiative encouraged positive behavioural changes within the Group, and in 2024 the Group remains committed to consumptions efficiency and expects that units that achieved the target set for 2023 maintain the consumption and expects the others to continue working toward the 15% reduction.

Resource use and management

[ESRS E3] [ESRS E5]

The Group seeks to ensure water reuse, reduce overall water consumption across all operations, as well as to foster circular economy and sustainable design projects to guarantee the purpose of generating positive impacts related to resource use and management. This approach also aims to manage and mitigate risks related to regulatory constraints on water supply or higher water tariffs in vulnerable areas, to water shortages during heat waves, affecting productivity and product and service quality, to rising cost associated with fees, fines and penalties related to water and waste treatment, as well as increasing expenditure related to price fluctuations in conventional materials and pressure to integrate the use of sustainable materials. At the same time, the Group identifies opportunities to reduce costs through the installation of water-efficient equipment and the adoption of consumption reduction practices. This approach is guided by the analysis of impacts, risks and opportunities (IROs), conducted in line with the CSRD’s double materiality principles, allowing the organisation to anticipate challenges and reinforce its resilience.

WATER MANAGEMENT

The year 2024 was marked by a strong focus on water efficiency and the responsible management of natural resources. The publication of Resolution of the Council of Ministers No. 26–A/2024 in Portugal, which set a 15% water consumption reduction target for the tourism sector in the Algarve compared to the previous year, represented a decisive moment for the entire industry. The Group responded in a structured and proactive way, signing the Water Efficiency Commitment and implementing the “Save Water” label across 12 units in the Algarve.

This commitment required the development of a 30 measures action plan, which was implemented and monitored throughout the year, promoting efficient water use and ensuring compliance with the legal and environmental requirements that defined 2024. The Group achieved a 16,3% reduction in total water consumption, exceeding the 15% target set for the Algarve region.

These practices were quickly replicated across all Group units, consolidating an integrated approach to water management throughout operations.

In 2024, the Group also published and made available internally the “Good Practices Manual for Sustainable Water Use,” which compiles guidelines and practical examples to reinforce a culture of efficient and responsible water use in all areas of the Group’s operations.

WATER CONSUMPTION



2.756 ML

of total water consumption

–6%

reduction compared to 2023



70%

of consumption in areas of water stress

HOSPITALITY 2024

545 I

occupied room

7.8%

increase compared to 2023

Pestana International Holdings S.A.
Sustainability Report 2024

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During 2024, the Alvor desalination plant began operation, contributing to the water supply in regions with limited availability. In parallel, the Boavista Wastewater Treatment Plant (BWTP) underwent a process renewal, enabling up to 50% of treated water to be reused for irrigating the Pestana Gramacho and Pestana Vale da Pinta golf courses, thereby reducing pressure on local water resources.

CIRCULAR ECONOMY AND WASTE MANAGEMENT

[E5-5]

The management of waste and the adoption of circular economy practices remain key priorities for Pestana Hotel Group, reflecting its commitment to reducing the environmental impact of operations and promoting the efficient use of resources.

Although there is still no formal Circular Economy Policy, the Group’s sustainability approach integrates principles that guide this approach, including respect for ecosystems and local communities, preference for recycled or low-impact materials, waste reduction, and partnerships with like-minded entities.

In 2024, the Group achieved a major milestone in waste management, with all units began recording their waste production in specific tracking sheets, enabling year-round monitoring of quantities generated and recycling rates.

In parallel, pilot projects were developed to strengthen circularity, including the use of composting accelerators, domestic composting, and food waste monitoring through KITRO technology.

These initiatives aimed not only to reduce landfill waste but also to generate actionable knowledge for the entire Group.

The Group remains committed to integrating circular economy practices into its operations, promoting the use of recycled or low-impact materials and the responsible selection of consumables and equipment. During 2024, this commitment was reinforced through internal awareness campaigns focused on reducing single-use items, digitalizing processes, and donating materials such as mattresses, chairs, and linens, extending product life cycles. A total of 9.241 tonnes of waste were generated in 2024, representing a 15% reduction compared to 2023.

	2024	2023
Waste generated (t)	9.241	10.843
Waste generated per occupied room (kg)**	2,4 kg	3,4kg

The largest waste stream was municipal solid waste (MSW), totalling 3.549 tonnes (38%), consisting mainly of mixed materials. Construction and demolition waste (C&DW) represented the second largest stream with 3.241 tonnes, followed by organic waste with 896 tonnes (10%), primarily from food service and hospitality operations.

Types of Waste (t)	2024		2023	
Municipal Solid Waste (MSW)	3.549	38%	6.246	58%
Construction and Demolition Waste (C&DW)	3.247	35%	2.265	21%
Organic Waste	896	10%	1.059	10%
Glass	553	6%	734	7%
Metal/Plastic	195	2%	608	6%
Paper/Cardboard	335	4%	604	6%
Cooking Oils and Fats	87	1%	57	0,5%
Other Non-Hazardous Waste	157	2%	79	3%

The waste composition reflects the diversity of the Group's operations, which also encompass beverage production and other business areas.

Final Destination	2024		2023	
Waste diverted from disposal / sent for recovery	4.350 t	47%	4.482 t	41%
Waste sent for disposal	4.892 t	53%	6.360 t	59%

In terms of recycling, the main recovered materials were glass (553 t), paper/cardboard (335 t), and metal/plastic (195 t), representing a significant share of all waste sent for recovery. Additionally, 87 tonnes of cooking oils and fats were collected and recycled, reducing the environmental impact associated with their disposal.

Waste Recovery	2024		2023	
Waste sent for recycling	2.004 t	18%	1.366 t	15%
Waste sent for recovery (other forms)	2.265 t	21%	2.983 t	32%

Within the Group, organic waste and construction and demolition waste (C&DW) stand out due to their volume and environmental impact. Below is an outline of each flow from start to finish:

ORGANIC WASTE (896 TONNES)

Origin: This stream results mainly from food service activities – meal preparation and consumption in hotel dining areas (restaurants, buffets, cafeterias) as well as from food leftovers generated in accommodation units. It is produced daily and in large quantities, given the continuous nature of hospitality operations.

Final's Destination: Most organic waste is currently sent for disposal, primarily to landfill, despite its high potential for organic recovery (e.g., composting). Although not yet valorised in all units, most hotels already separate and measure this waste stream. In some properties, such as Hotel Pestana Curitiba (Brazil), partnerships have been developed with specialized operators to ensure certified composting, evidenced by certification from Composta+. There were also pilot composting projects, including a composting accelerator at Pestana Palace Lisbon and domestic composting at Pousada da Ria.

CONSTRUCTION AND DEMOLITION WASTE (C&DW) (3.241 TONNES)

Origin: C&DW results from construction, renovation, expansion, and maintenance works, common interventions in the hospitality sector to ensure modernization of facilities and compliance with new comfort, accessibility, and sustainability standards.

Final's Destination: Most of this waste is sent to recovery operations, including sorting and reuse of inert materials (such as concrete, ceramics, and masonry) at licensed recycling facilities.

C&DW represents the largest individual volume of recovered waste and is a priority stream in the sustainable management of construction projects at Pestana Hotel Group.

The Group has also begun internally measuring its organic waste on an estimated basis. This new process aims to raise staff awareness about the importance of proper separation and monitoring of this waste stream, even in locations where it is not yet individually treated. For estimated values, a manual weighing (in kg) or volume estimation method (based on container size) was applied, collecting representative data each month.

Regarding municipal solid waste (MSW), the Group has implemented several measures to reduce mixed waste generation, including enhancing source separation practices and promoting appropriate recovery solutions. These initiatives demonstrate the Group's commitment to efficient and sustainable waste management, in line with circular economy principles.

PROGRAMS AND INITIATIVES LAUNCHED IN 2024

REDUCTION OF FOOD WASTE THROUGH KITRO TECHNOLOGY

The Group implemented the KITRO program, an innovative technology that combines sensors, artificial intelligence, and data analytics to monitor food waste in real time across hotel operations. The system identifies quantity, type, and timing of food waste, providing detailed reports that support decision-making. Based on this data, teams can adjust production, portioning, and menu planning, significantly reducing food waste, associated costs, and the environmental footprint.

ORGANIC WASTE RECOVERY INITIATIVES

The Group launched pilot projects dedicated to organic waste recovery, including the installation of a composting accelerator at Pestana Palace Lisbon and the implementation of domestic composting at Pousada da Ria. These initiatives aim to reduce the amount of waste sent to landfill and to enhance circularity through the production of usable compost, contributing to more sustainable hotel operations.

ONGOING PROGRAMS AND INITIATIVES

Throughout 2024, the Group continued several sustainability actions initiated in previous years, notably:

- **Smart Waste Portugal:** Since 2022, Pestana Hotel Group has been part of the Smart Waste Portugal collaborative network, which promotes the transition to a circular economy in Portugal.
- **Pestana Curitiba & Composta+ Partnership:** Since 2022, Pestana Curitiba has maintained an organic waste sorting and composting campaign in partnership with Composta+.
- **“Say No to Plastic” Program:** Launched in 2019, this program promotes the replacement of single-use plastics with reusable or recyclable alternatives, focusing primarily on amenities, breakfast service and beverage cups.
- **Donation of Goods:** In 2024, the Group donated toys, IT equipment, over 200 chairs, more than 3.000 towels, 300 mattresses, and 54 bed bases under the Planet Guest program, contributing to the circular economy and community wellbeing.

3.2. PEOPLE: VALUING THOSE WHO SHAPE OUR STORY

“Caring for people is the foundation upon which we build memorable experiences and a sustainable future.”

Pestana Hotel Group places people at the heart of its operations, recognizing that the quality of the guest experience begins with the wellbeing, empowerment, and inclusion of its teams.

Grounded in principles of responsibility, equity, and continuous development, the Group promotes attractive working conditions, career growth opportunities, and a safe and healthy environment, reinforced by training, health, and wellbeing programs.

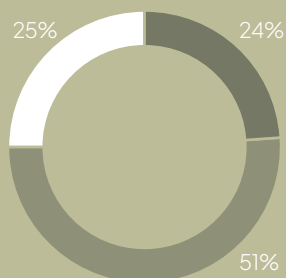
This approach is structured around four complementary pillars: attraction and retention of talent, through clear recognition policies and competitive benefits; learning and development, with the Pestana Academy offering structured training paths aligned with business needs; diversity, equity, and inclusion, ensuring equal opportunities and plural, balanced teams; and health and safety at work, through preventive practices and continuous investment in training and work conditions. Through these actions, the Group strengthens its culture, creates value for communities, and upholds the excellence that defines the Pestana hospitality experience.

2024 IN NUMBERS

4.328
employees



2.536 1.792



- >30 years old: 1.021
- 30-50 years old: 2.218
- <50 years old: 1.089

36%
women in senior positions¹

20%
women in the governance bodies

1,1%
of employees with disabilities

11h
average number of training hours

+36.000
hours of training

24%
turnover rate

278
work accidents

35%
occupational accident frequency rate

7.337
lost workdays due to injuries

+90
projects supported

+900.000€
in support granted

1. Senior management is defined as the categories of Management, Senior Management and Board

HIGHLIGHTS

BRP & PROMOV PARTNERSHIP FOR TALENT RETENTION

Active participation in the working groups of “More and Better Opportunities” and preparation of the first Tourism Lab, in partnership with the IEPF, with classes planned for 2025.

SEMÁFORO QUESTIONNAIRE

Implementation of the ACEGE Semáforo, enabling employees to conduct a 360° self-assessment across professional, personal and family dimensions, resulting in individual improvement plans.

ROAD TO EFR CERTIFICATION

Start of the evaluation process for efr – Family Responsible Company certification, reinforcing the commitment to work-life balance and personal wellbeing.

LAUNCH OF PESTANA WELLBEING

After carrying out several wellness initiatives over the past years, such as workshops, training sessions, leisure moments, or celebrations of important dates – which generated a wave of positive feedback – was decided to consolidate it into a single, permanent program to ensure their continuity, Pestana Wellbeing. This program addresses the importance of physical, emotional, social, professional, and financial well-being, which is reflected in improved performance among our people.

PESTANA FOODIES WITH PESTANA ACADEMY

Development program for Food & Beverage teams focused on culinary trends, experience sharing and team-building activities.

Talent, development, and diversity

[ESRS S1]

At Pestana Hotel Group, we believe that our true competitive advantage lies in our people. It is our employees who make it possible to deliver memorable guest experiences, ensuring the excellence and authenticity that define our brand. For this reason, employee valorisation, wellbeing, inclusive development opportunities, and attractive working conditions remain a strategic priority across all geographies and business areas.

Pestana Hotel Group's continuous work to the purpose of generating positive impacts related to talent attraction and retention, employee development, and the promotion of diversity, equity and inclusion. The Group seeks to ensure the stability and professional security of its teams, foster the development of skills and provide training opportunities suited to each employee's role and interests, while promoting a positive and inclusive organisational culture that values equal opportunities. This approach also aims to manage and mitigate risks such as labour shortages, reduced productivity, and potential reputational risks. At the same time, the Group identifies opportunities to enhance productivity and innovation through stable and qualified teams, strengthen its competitive positioning in the labour market by improving compensation and benefits, and foster a diverse and creative business culture that contributes to sustainable growth. This approach is guided by the analysis of impacts, risks and opportunities, conducted in line with the CSRD's double materiality principles, allowing the organisation to anticipate challenges and reinforce its resilience.

TALENT AND DEVELOPMENT STRATEGY 2022–2024

The Talent and Development Strategy of Pestana Hotel Group was designed for the 2022–2024 triennium, with the aim of strengthening the organization’s culture, employee engagement, and professional growth. The main strategic pillars defined were:

CONSOLIDATE THE PESTANA ACADEMY

Strengthening the quality and diversity of training programs, including e-learning, digitalizing processes, consolidating development programs such as Growing Together, Cross Training, Trainees, and Mobility, and promoting internal and external knowledge sharing sessions.

DISSEMINATE THE PESTANA CULTURE

Integrating the values of the Pestana Culture into internal initiatives, conducting interactive workshops, creating support materials such as booklets, welcome kits, newsletters, and posters, and ensuring continuous communication of the organizational culture.

CONTINUE INVESTING IN TALENT MANAGEMENT

Strengthening partnerships with external entities and schools, improving the integration of seasonal employees and interns, consolidating mobility programs, creating new internal career opportunities, and evolving the compensation and benefits model.

ENHANCE THE EMPLOYEE EXPERIENCE

Improving the onboarding process through dedicated integration programs such as Pestana World and Pestana Welcome, celebrating key milestones, renovating workspaces and staff accommodations, and strengthening partnerships and discount programs with external entities.

ATTRACTION AND RETENTION OF TALENT

Pestana Hotel Group’s approach to talent management is guided by principles of responsibility, equity, and people development, placing employees at the heart of its organizational strategy. The Group ensures full compliance with labour legislation in all geographies where it operates and reinforces this commitment through a set of practices that support positive and sustainable impacts throughout employees’ professional life cycle.

To strengthen talent attraction, the Group maintains an active presence at job fairs, conducts presentations in schools, and organizes open days at its units, fostering close relationships with students, young professionals, and future employees. This proactive engagement is complemented by internship and trainee programs, which serve as entry points for careers in the hospitality sector and help attract and develop high potential talent.

The benefits package offered by the Group is a distinguishing factor in retaining talent, as it includes solutions that directly impact the quality of life of employees.

BENEFITS INCLUDE:

- Health and wellbeing support, such as health insurance and psychological assistance;
- Benefits that offer unique experiences, including an annual stay voucher at a Pestana unit;
- Exclusive discounts on accommodation and dining across the Group's properties;
- The employee card, which is continuously improved with external partnerships that expand access to additional advantages and services.

Talent retention is supported by consistent policies for continuous professional development, implemented through the Pestana Academy, the Group's internal training program that provides capacity-building programs across multiple areas, ensuring employees have access to career growth and advancement opportunities.

TURNOVER RATE

2024

24%

(Permanent employees and those with non-seasonal contracts who left the company)

Additionally, as part of its commitment to retaining employees, reducing inequalities, and strengthening internal equity, the Group carries out an annual pay review, ensuring its adjustment to the economic context while rewarding individual performance. In Portugal since 2022, the Group has recorded a cumulative 20% increase in minimum remuneration, accompanied by an average salary adjustment of 18,5% across the entire workforce.

With this integrated approach, Pestana Hotel Group positions itself as a relevant employer in the hospitality sector in Portugal, capable of attracting, motivating, and retaining talent while fostering an inclusive, fair, and sustainable work environment.

EMPLOYEE DEVELOPMENT THROUGH THE PESTANA ACADEMY

Pestana Hotel Group views the continuous development of its employees as a key factor in ensuring both service quality and the long-term sustainability of the business. Through the Pestana Academy, the Group delivers structured training and development programs tailored to different career stages and the specific needs of each team.

In 2024, the Group delivered over 36.000 hours of training, reaching more than 3.300 employees across various critical areas, reinforcing its commitment to nurturing internal talent and preparing teams to meet future challenges.

+36.000
total training hours

11,0
average training hours
per employee

+3.300
nº employees trained

Leadership
3.306
hours

F&B
2.231
horas

Languages
1.660
hours
English, Portuguese,
French and Spanish

Inclusion
477
hours

Cybersecurity
350
hours

PILLARS OF PESTANA ACADEMY

- 1
GROWING EXPERIENCES
- 2
LEARNING EXPERIENCES
- 3
SHARING EXPERIENCES

1 GROWING EXPERIENCES – EMPLOYEE DEVELOPMENT THROUGHOUT THEIR CAREER

Growing experiences for individual and career development, through relevant programs depending on job function, job level, following the different stages of the employee journey.

GROWING TOGETHER (13TH EDITION)

An international rotation and intensive training program across different group units and departments. Participants complete two weeks of training in Lisbon, followed by six weeks in each region – Madeira, Lisbon, Porto, Algarve, one Pousada, Africa, and either Europe or the United States – culminating in a specialization within a specific unit and role.

2024: 5 new participants

“This program provided a deeper understanding of the operational side of the hotel business, as well as contact and communication with operations managers and regional directors (...). It created a sense of belonging and identification with the Group’s brand, understanding the service provided to customers, and interacting with colleagues who work at the unit.”

Accounting & Tax employee, on her cross-training experience

PESTANA MOBILITY

International mobility experiences that promote cross geographical exchange, address temporary or specific operational needs within the Group, and strengthen the sense of belonging among employees.

2024: 44 participants

CROSS-TRAINING

Short-term operational experiences (5 to 15 days) in various group units, allowing employees to gain exposure to different operational contexts and functions.

2024: 28 participants

SHARED SERVICES TRAINEE PROGRAM

Integration of trainees into strategic teams such as Revenue Management Europe, Transformation Office, CRM & Loyalty, Marketing, E-commerce, and BI & Innovation, fostering the development of future professionals in key business areas.

2024: 7 trainees

2 LEARNING EXPERIENCES – MOMENTS OF LEARNING AND TRAINING IN VARIOUS SKILLS

Learning experiences conducted in different formats, namely, classroom, remote, on-the-job or blended, through certified internal or external trainers.

RECONNECT DAYS

– “WHY SHOULD I BE THE ONE TO LEAD?”

An initiative designed to bring together and develop the leaders of Pestana Hotel Group, strengthening relationships and preparing for the future, with 2024 placing a special focus on individual leadership.

2024: 60 senior managers and directors

EMPOWERED HOSPITALITY

A training program delivered in partnership with Católica Lisbon School of Business & Economics, featuring a week dedicated to sharing strategies and best practices for addressing emerging challenges, including the integration of new technological tools, giving effective feedback, improving customer experience, and enhancing leadership skills.

2024: 30 managers

OPERA CLOUD

Front-office teams across all regions received training from a multidisciplinary team prepared to share knowledge on the Group’s major 2024 transformation project – the upgrade of its global architecture and interface to integrate all moments of the customer experience, increasing agility in identifying guest needs and behavioural patterns while improving performance and service quality.

2024: 2.823 training hours

3 SHARING EXPERIENCES – SHARING KNOWLEDGE AND BEST PRACTICES

Sharing experiences of internal knowledge and best practices, with the goal of building bridges between departments, promote interpersonal and interdepartmental relationships, which help strengthen organizational culture.

PESTANA SHARING

Created to promote internal knowledge-sharing sessions, the initiative serves as a platform for communicating new projects and best practices across the Group.

2024: 7 sessions were held on topics such as Waste Management in Portuguese Hotels, the Opera Cloud Project, Planet Guest initiatives, Cybersecurity and Artificial Intelligence, and New Gastronomic Trends.

PESTANA INVITES

An initiative that brings inspiring external speakers to share meaningful and motivational life experiences, delivering impactful messages to the organization.

2024: Featured the Founder and CEO of **Girl Move Academy**, who shared the impact of the project alongside the **Girl Mover**, who completed a one-month internship with Pestana Hotel Group in September.

PESTANA CEO TALKS & CEO & PRESIDENT LIVES

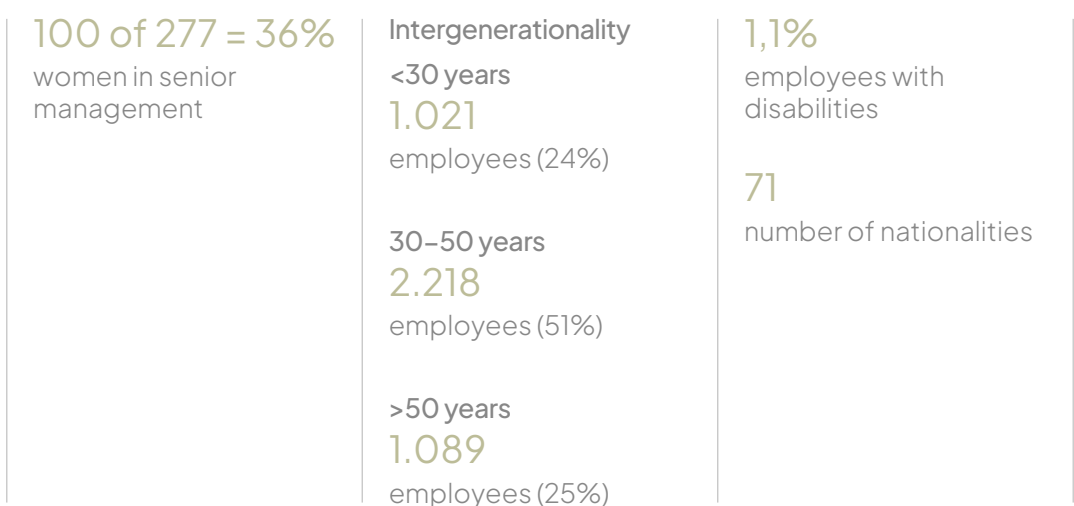
Initiatives designed to promote closer relationships with employees and ensure greater transparency and engagement across the Group regarding its main developments.

CEO **José Theotónio** led sessions in the Algarve, Madeira, Lisbon, and Porto, presenting the main results of 2023 and the challenges and new projects for 2024. In November, a **CEO Live** webinar was held.

The **President, Dionísio Pestana**, also hosted a Group-wide webinar to present the year’s results and awards, and to discuss the main strategies, objectives, and upcoming projects.

DIVERSITY, EQUITY, AND INCLUSION

At Pestana Hotel Group, equality and inclusion are fundamental pillars of our human resources policy and organizational culture, integrated in our Code of Conduct. Operating in a sector that, by its nature, reflects diverse cultures and contexts, we believe that inclusive and diverse teams enrich the work environment, promote collaboration, and have a direct and positive impact on the experience of our guests, even those from a wide range of backgrounds.



In 2024, women represented 36% of senior management, a metric that reinforces the Group’s ongoing progress in promoting gender equality in leadership roles.

At the same time, the age distribution of our workforce reflects an intergenerational and complementary team, which contributes to a culture of experience sharing and continuous learning.

Inclusion also encompasses the integration of people with disabilities, ensuring equitable employment opportunities aligned with local legislation.

These practices translate into positive social impact and strengthen a more humane, diverse, and representative corporate culture, fostering creativity, innovation, and resilience essential for the future of the hospitality industry.

Health, wellbeing, and safety

[ESRS S1]

Employee health, safety, and wellbeing are essential elements for ensuring safe, balanced, and motivating work environments. The Group recognizes that caring for people is fundamental to business sustainability, ensuring more resilient, productive teams capable of providing excellent service to guests.

Pestana Hotel Group's strategy aims to promote a safe, healthy and balanced work environment, contributing to the physical and emotional wellbeing of its employees. This commitment is reflected in the continuous improvement of workplace facilities and conditions, the promotion of work-life balance, and the strengthening of health and safety protocols and occupational health programmes. While the Group maintains robust practices in this area, it recognises that, hypothetically, risks could arise such as potential non-compliance with health and safety regulations, increased absenteeism due to illness, or possible penalties associated with regulatory breaches. At the same time, fostering healthy workplaces represents an opportunity to enhance motivation, reduce turnover and increase team productivity. This approach is guided by the analysis of impacts, risks and opportunities (IROs), conducted in line with the CSRD's double materiality principles, reinforcing organisational resilience and sustainability.

EMPLOYEE SATISFACTION WITH "PESTANA WELLBEING"

The Group is committed to strengthening its conditions and benefits, which have a direct impact on employee quality of life. These include wellbeing benefits such as health insurance and psychological support, as well as benefits that provide employees with experiences, such as an annual stay voucher at a Pestana property of their choice and discounts on accommodation and dining at the Group's properties. The Group continues to work on improving its employee card by creating and improving partnerships for its employees.

Improvements were made to common areas and renovations were carried out at the Lisbon and Algarve offices, as well as at the accommodations in Madeira, Algarve, and Porto Santo. Furthermore, all ongoing employee wellbeing and health initiatives are now integrated into the new Pestana Wellbeing program.

Pestana Wellbeing goal is to provide each employee with a happy and balanced work environment, promoting actions and activities that encourage healthy habits, emotional support, social integration, professional development, and financial stability.

PESTANA WELLBEING IN 2024

- Thematic webinars on stress management, mental health, healthy eating, and financial literacy;
- Promotion of physical activity, such as the Group's soccer championship, which featured more than 85 players from different regions;
- Celebrations and events that fostered moments of togetherness and team spirit, such as inaugurations, Christmas parties, and end-of-day get-togethers;

–Awareness campaigns, marking important dates such as International Women’s Day, Children’s Day, or Non-Discrimination Day.

In parallel, the Group implemented the **Semáforo Questionnaire**, in partnership with **ACEGE**, to analyse the professional, personal, and family realities of its employees across six key dimensions:

Income and Employment	Housing and Infrastructure	Organization and Participation
Health and Wellbeing	Education and Culture	Interiority and Motivation

This initiative led the Group to start the preparation for **efr (Family-Responsible Company) certification**, promoting measures that support greater balance between personal, family, and professional life, grounded in flexibility, respect, and mutual commitment.

EMPLOYEE ENGAGEMENT

SATISFACTION LEVEL

2024

79.4%

(highest value since 2017)

The Group monitors the engagement of its employees through a survey that measures satisfaction in key areas:

Leadership	Integration and collaboration	Learning and development
Culture	Sustainability, diversity and inclusion	Compensation, benefits, attraction and retention
Internal communication	Working conditions and wellbeing	

The Organizational Survey analyses employee satisfaction, identifying improvement areas to take actions that positively impact teams and to be able to analyse employee perceptions of these initiatives. Satisfaction analysis is conducted by each area/business together with Human Resources to appropriately address the specific priorities and challenges of each location.

The Group continued its commitment to internal communication, relaunching the quarterly One Pestana magazine and the biweekly Pestana Connect newsletter to streamline internal initiatives and raise awareness of key developments. Regular activities such as CEO Talks and President Live ensured the dissemination of strategy and institutional feedback.

OPERATIONAL SECURITY

Operational safety is a strategic priority at Pestana Hotel Group, reflecting our commitment to ensure safe working environments in compliance with legislation and best international practices. We believe that risk prevention and promoting a culture of safety are essential to protecting employees, ensuring the continuity of operations, and strengthening the trust of our guests.

TRAININGS IN SECURITY

2024

6.490 hours

In 2024, the Group strengthened its policies and procedures in this area, investing in ongoing training and accident and incident prevention mechanisms. More than 6.400 hours of safety training were provided, covering topics such as first aid, use of defibrillators (AEDs), evacuation drills, and occupational safety and hygiene. These actions aimed not only to meet legal requirements but also to empower teams to respond effectively in risky situations, promoting a culture of prevention across all units.

TRAININGS IN HACCP

2024

1.336 hours

Implementing rigorous food hygiene and safety (HACCP) systems in food and beverage services is another pillar of operational safety, ensuring high quality standards and customer trust. The HACCP training program involved more than 1.300 hours in 2024, reinforcing the technical qualifications of teams and raising awareness of compliance with good food handling practices.

In addition to training, the Group has invested in the continuous improvement of the physical conditions of its workspaces, including renovations and adaptations that increase the safety of employees and guests.

One of 2024’s highlight was the renovation of the shared services offices in Lisbon and the Algarve, as well as the improvement of staff accommodation management in the Algarve, Madeira, and Porto Santo operations. These interventions contributed to greater employee satisfaction, motivation, and a stronger sense of belonging within the organization.

With these measures, Pestana Hotel Group promotes a safe, healthy, and resilient work environment, where the protection of people is always the top priority.

N. Accidents at work	N. Fatal Accidents	Occupational accident frequency rate
278	0	35%

Involvement and development of local communities

[ESRS S3]

Pestana Hotel Group is actively committed to the development of the communities in which it operates, through the revitalization of the local economy and the appreciation of cultural and historical heritage. We believe that sustainable tourism is not limited to offering quality accommodation, but also the ability to generate a positive impact on the region, creating economic opportunities, preserving collective memory, and strengthening the attractiveness of destinations.

For Pestana Hotel Group, it is important to have an active commitment to the sustainable development of the communities in which it operates, promoting local engagement, heritage preservation, and the strengthening of regional economies. The Group contributes to preserving the culture and identity of local populations, creating employment opportunities, and supporting the development of other businesses within the local economic fabric, thereby fostering shared value creation. Its operations also include the rehabilitation and enhancement of historical and real estate heritage, reinforcing recognition for differentiated projects that contribute to the conservation of cultural legacy. The Group also recognises opportunities to create value and enhance its reputation through responsible and balanced action within the tourism sector. This approach also seeks to mitigate potential reputational risks associated with the stigma surrounding tourism, ensuring that the Group's activities generate a positive and sustainable impact for host communities. This positioning is supported by the analysis of IROs, conducted in line with the CSRD's double materiality principles, enabling greater resilience and long-term value creation.

ENHANCEMENT OF HERITAGE, CULTURE AND LOCAL ECONOMY

The preservation of historical heritage is a commitment of Pestana Hotel Group, which sees building renovation as an opportunity to combine hospitality, culture, and sustainability. Each year, the Group invests millions of euros in the restoration of listed properties of great architectural value, ensuring their conservation and adaptation to client needs.

Iconic buildings have already been restored and preserved both in Portugal and abroad. Some examples include the Pestana Douro (formerly the Floral Factory), the Pousada das Flores in Porto, the renovation of the historic Pombaline center of Vila Real de Santo António, and properties in international cities such as New York, Madrid, and Amsterdam.

In 2024, Pestana Hotel Group invested €2.3 million in the rehabilitation and renovation of its properties, reinforcing its commitment to urban regeneration and the preservation of cultural heritage.

Among the most important projects are the Pousadas de Portugal, part of Pestana Hotel Group since 2003, which represent a landmark in Portuguese tourism and an internationally recognized brand. These properties, often located in castles, convents, and other historic buildings, offer guests a unique experience, preserving the cultural identity of the locations and reinforcing their tourist and economic value.

In 2024, Pestana Hotel Group invested €2.3 million in the rehabilitation and renovation of its properties, reinforcing its commitment to urban regeneration and the preservation of cultural heritage.

COMMUNITY INVOLVEMENT

Pestana Hotel Group recognizes that tourism is only truly sustainable when it generates shared value with communities. Therefore, each of the Group’s properties is more than a hotel, it is a driving force in the community where it operates. By creating direct and indirect jobs, hiring local suppliers, and encouraging the consumption of regional products and services, Pestana Hotel Group contributes to the economic vitality of its localities. This impact is multiplied by its presence in different geographies, enhancing synergies between local identity and the Group’s global offering.

Beyond the economic aspect, Pestana Hotel Group ensures a structured process of engagement with communities, fostering relationships of trust and cooperation.

THE ENGAGEMENT PROCESS INTEGRATES DIFFERENT MECHANISMS:

- Involvement and direct contact with local communities in the destinations where the Group operates, through regular meetings with NGOs, community, and cultural associations;
- Social and cultural cooperation projects, within the scope of the Planet Guest program, which incorporate community contributions in defining support priorities, particularly in the areas of education, inclusion, culture, and entrepreneurship;
- Consultations and institutional partnerships for the preservation of listed heritage sites, ensuring that the rehabilitation of historic buildings is conducted in collaboration with community representative entities and with respect for local traditions.

Through this participatory approach, the Group ensures that the perspectives and needs of communities are incorporated into its strategic and operational decision-making processes. This transparent dialogue allows it to anticipate risks, identify opportunities, and ensure that the Group’s presence in the territories contributes positively and lastingly to their sustainable development.

COMMUNITY DEVELOPMENT WITH PLANET GUEST

Planet guest +90 projects supported	+900.000€ in support granted
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Pestana Hotel Group’s commitment to the communities where it operates is embodied through the PLANET GUEST – Pestana’s Sustainability Program, a unifying concept that conveys the Group’s vision as an organization that respects and values the environment, society, and corporate ethics. With the slogan “We are just guests of the Planet,” the program embodies the awareness that business prosperity depends on respect for natural resources and the social and cultural vitality of the regions.

In the social pillar, PLANET GUEST promotes projects that directly support local communities, promoting inclusion, education, culture, volunteerism, and the restoration of listed heritage sites.

PROJECTS AND PARTNERSHIPS

“OBRIGADO POR AJUDAR” PROGRAM

Launched in 2009 across the Group’s units in Portugal, this fundraising initiative invites guests to make voluntary donations, which are then doubled by the Group, amplifying the positive impact on beneficiary organizations. In 2024, a total of €334.897 was raised.

ASSOCIAÇÃO JOÃO 13

In partnership with Colégio Pedro Arrupe (Portugal), this initiative ensures 70 dinners and 70 breakfasts every week for people experiencing homelessness in Lisbon, with the active participation of Group employees. In 2024, over 4.000 meals were provided.

EPIS – EMPRESÁRIOS PELA INCLUSÃO SOCIAL

Support through the donation of **study grants**, fostering social inclusion and youth empowerment by helping to prevent school dropout and promote professional integration. In 2024, the Group contributed with **27 nights** to EPIS.

ART INSTITUTE (NEW YORK)

An international partnership that promotes Portuguese culture within the New York art community, serving as a platform for visibility and intercultural dialogue for national artists. The Group contributed with **52 nights** to the Art Institute in 2024.

DÉJÀ LU SOLIDARITY BOOKSTORE

Located at Pestana Cidadela Cascais, this initiative supports APPT21 – the Portuguese Association for People with Trisomy 21. It combines culture and social inclusion by donating all proceeds from book sales to training and empowerment projects for people with Down syndrome.

GIRL MOVE ACADEMY (MOZAMBIQUE)

Collaboration that promotes the empowerment and leadership of young Mozambican women. In 2024, the Group strengthened this partnership by hosting another **Girl Mover**, continuing to support transformative female leadership.

INITIATIVES IN 2024

In 2024, Pestana Hotel Group reinforced its commitment to solidarity and proximity to communities, through the donation of essential goods and services, supporting dozens of associations and directly benefiting thousands of people in vulnerable situations. More than 3.600 goods were donated including toys, mattresses, chairs, towels, informatic material as well as milk and food baskets.

In addition to partnerships and co-financing of external projects, Pestana Hotel Group also develops its own initiatives to support communities, seeking to meet social needs and promote local development.

Among the initiatives carried out, highlights include the renovation of a classroom and volunteering at Casa do Gaiato, as well as support for the acquisition of housing for vulnerable families. The Group also contributed to the rehabilitation of the kindergarten in São Tomé and the construction of classrooms in Ribeira de Afonso, strengthening access to education in more vulnerable contexts.

The Group supported painting and renovation work at Casa da Alegria and Lar Bom Samaritano, improving the reception and wellbeing of their residents.

Environmentally, highlights included the cleanup initiatives at Praia Formosa and Praia de Alvor, mobilizing local employees and partners to preserve coastal ecosystems and promote environmental awareness.

These initiatives highlight the Group's integrated approach, which goes beyond philanthropy and seeks to create shared and lasting value. By investing in education, promoting community infrastructure, and promoting environmental projects, Pestana Hotel Group reinforces its role as an active agent of local development in all the regions where it operates.

Customer experience and wellbeing

[ESRS S4]

Guest experience and wellbeing are at the heart of Pestana Hotel Group's operations, which prioritizes providing quality, safe, and memorable stays, supported by principles of trust, transparency, and continuous improvement. Through clear policies, active listening mechanisms, and dedicated support channels, the Group strives not only to respond quickly and effectively to guest needs but also to anticipate challenges, strengthening daily its close relationship with all who trust the brand.

Pestana Hotel Group places customer health, safety and wellbeing at the core of its value proposition, ensuring excellence across all units and services. The Group upholds high standards of safety and hygiene through rigorous cleaning of its facilities and products, compliance with food safety regulations, and the continuous improvement of nutritional quality and production processes. At the same time, it promotes guest comfort and wellbeing, ensuring that every experience meets their expectations and needs. This approach strengthens customer satisfaction and loyalty while reinforcing trust and brand reputation. The Group acknowledges that potential risks may arise from non-compliance with regulatory requirements or from security challenges in certain geographies and therefore invests in continuous monitoring and ever-higher quality standards. By fostering a culture of continuous improvement, the Group identifies opportunities to enhance customer satisfaction and loyalty, strengthen competitive differentiation and generate added value for the business. This approach is guided by the analysis of impacts, risks and opportunities (IROs), conducted in line with the CSRD's double materiality principles, reinforcing the Group's resilience and long-term sustainability.

CUSTOMER PROTECTION POLICIES AND MECHANISMS

Pestana Hotel Group guarantees consumer protection through policies and instruments that ensure transparency and accountability in all interactions. These mechanisms include the Personal Data Protection Policy, which ensures confidentiality and responsible use of information; the Employee Code of Conduct and Ethics, which sets out clear standards of ethical behaviour; and the Customer Ombudsman, created as part of the Planet Guest Program.

CUSTOMER OMBUDSMAN

The Ombudsman’s Office is an independent channel, present in all the Group’s hotels worldwide, whose mission is to safeguard the rights, guarantees, and legitimate interests of guests. It acts impartially, carefully analysing each situation and proposing fair and appropriate solutions, reinforcing customer trust in the brand. Through the Ombudsman’s Office, the Group promotes the continuous improvement of its service standards, creating a direct link between guests and management, and positioning itself as a benchmark in social responsibility and ethical hospitality.

ACTIVE LISTENING AND CONTINUOUS IMPROVEMENT

The Group consistently values and integrates customer perspectives into its decision-making processes, considering their input essential to the evolution of its services. Post-stay satisfaction surveys are conducted, as well as regular monitoring of reviews and comments on digital platforms. The results are analysed by the responsible teams and reported monthly to the Executive Committee, providing a clear overview of overall performance and areas requiring priority attention.



These active listening practices are not limited to identifying areas for improvement, but also recognize best practices and experiences valued by customers. Based on this information, strategic and operational actions are defined, from improving internal processes to introducing new services. This approach ensures that continuous improvement is not just a goal, but a practice ingrained in Pestana Hotel Group’s organizational culture, sustaining excellent customer service.

PERSONALIZED AND TRANSPARENT RESPONSE

Pestana Hotel Group ensures that every customer request or complaint is handled individually, quickly, and transparently, strengthening trust and loyalty. Whenever a situation with a significant impact on the customer experience is identified, internal processes are activated to thoroughly analyse the causes and implement corrective measures.

CORRECTIVE MEASURES

- **Cancellation policy for reservations**, which allows for rescheduling or refunds in the event of unforeseen circumstances, minimizing the financial and operational impact on guests;
- **Proactive communication**, which ensures that guests are informed in advance of significant service changes (such as construction or temporary unavailability of facilities);
- **Personalized support**, in which customer service teams and the Ombudsman evaluate each case and propose appropriate solutions, which may include upgrades, compensation, or alternative offers.

All reported situations are recorded and monitored until their final resolution, ensuring transparency and accuracy throughout the process. This approach allows the Group to not only resolve problems but also transform adverse situations into opportunities to strengthen the relationship of trust with its customers.

3.3. GOVERNANCE: LEADING RESPONSIBLY AND INNOVATIVELY

“Leading responsibly means ensuring that every decision is aligned with the future we want to build.”

The governance model of Pestana Hotel Group is grounded in the organization’s values, identity, and history, ensuring an effective structure for supervision and agile decision-making.

The structure is led by the Board of Directors of Pestana International Holdings S.A., composed of five members, three of whom are independent, and is responsible for overseeing the Group’s activities, ensuring its sustainable development, and creating long-term value for the Group and its stakeholders.

The appointment of board members is made by the shareholder of PIH and President of the Group, Dionísio Pestana, while the Board of Directors designates those responsible for managing the subsidiaries. Its main areas of responsibility include defining the Group’s strategic vision, supervising the management of subsidiaries and business areas, and making key strategic decisions.

Although the President continues to play an active supervisory role, particularly in investment processes, the Group’s day-to-day management is delegated to the Executive Committee. This committee is chaired by the Chief Executive Officer (CEO) and composed of the directors responsible for the main areas of the Group, operations, commercial, technology, human resources, finance, maintenance and legal.

The Board of Directors meets monthly with all directors to ensure transparency and alignment in strategic and tactical decisions, while the Executive Committee meets weekly to manage operational matters, ensuring efficient coordination across all areas and effective implementation of strategic decisions.

2024 IN NUMBERS

0	0	0
Non-compliances	Confirmed cases of corruption and actions taken	Legal proceedings for legal violations
0		
Fines paid for non-compliance		

HIGHLIGHTS

REDUCING THE ENVIRONMENTAL IMPACT OF THE SUPPLY CHAIN AND FOOD

Since 2023, the Group has been implementing measures to minimize GHG emissions and reduce waste, by optimizing the supply chain and food processes. Key initiatives include:

- Bulk purchasing in Portugal, reducing product references, deliveries, and associated emissions (work started in 2023 and continued in 2024).
- Reduction of plastics and disposables, with adjustments in ordering and packaging processes, promoting larger-volume formats and preparing the progressive elimination of single-use packaging.

E-LEARNING – CYBERSECURITY AND PRIVACY

This training was mandatory for certain levels of the organization, as well as for the reorganization of the company’s cybersecurity department.

DIGITAL TRANSITION

Around 10 million euros investment in digital transformation, which included the renovation of the entire hotel front-office system and the pestana.com website.

Business Conduct

[ESRS G1] [SBM-1] [SBM-3]

MANAGEMENT PRINCIPLES FOR A CULTURE OF COMPLIANCE AND INTEGRITY

Compliance is a priority for the Group, ensuring the proper functioning of the organization in alignment with applicable legislation across the various businesses and markets in which it operates. Given the size of the organization, comprised of more than four thousand employees and external stakeholders, as well as its geographic, cultural, and social diversity, the existence of common guiding principles and standards of conduct is essential, as they prevent the commission of illegal acts and help mitigate legal, financial, and reputational risks.

Pestana Hotel Group's strategy was designed with the purpose to generate and enhance positive impacts associated with business conduct, such as good practices in transparency and responsible conduct and the promotion of good governance practices in various sectoral ecosystems. The Group also aims to manage and minimize any potential financial effects. These include the risk of losing customers, partners, and employees due to perceptions of bad practices or lack of integrity in the business, as well as possible sanctions for non-compliance with ethical or compliance regulations. The Group also considers opportunities to attract new customers, partners, and employees who value ethical and transparent business practices, and to prevent costs or operational inefficiencies associated with corruption. This approach is guided by the analysis of IROs, conducted in line with the CSRD's dual materiality principles, which allows us to anticipate challenges and strengthen the organization's resilience.

The Group ensures compliance with applicable regulations in all business areas and geographies where it operates. Compliance management is based on strict compliance with the law, transparency, proportionality, and the ethical conduct of its companies and employees, rejecting any illegal or subterfuge practices. Furthermore, the Group adopts a preventative approach to its business conduct, applying the mechanisms described throughout this chapter not only to flag and resolve anomalies, but also, fundamentally, to prevent any risks associated with poor management practices.

THE ROLE OF ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES

In 2019, the Group began laying the groundwork for the Compliance Committee and approved its corresponding manual. In 2021, the formal establishment of the Committee was approved, with responsibility for appointing the directors in charge of the compliance function within the Group's companies, as well as the Compliance Officers. These officers are appointed for a five-year term and are tasked with ensuring adherence to the Compliance Manual and the Code of Conduct and Ethics, recording and reporting violations, and implementing necessary corrective measures.

The system currently in place, introduced in 2022, is based on a vertical segregation of duties: members of the Committee cannot simultaneously serve as directors responsible for the compliance function, and those directors, in turn, cannot serve as Compliance Officers.

The Committee members are responsible for implementing the Compliance Manual, coordinating the work of the Compliance Officers, and presenting an annual report to the respective Board of Directors, assessing non-compliance risks and outlining prevention and mitigation procedures. All members involved in this system are bound by a strict duty of confidentiality regarding matters related to their role, particularly in relation to whistleblowing cases, except where disclosure is required by law or necessary for proper action.

The Compliance Committee, appointed for a five-year term, meets regularly every two months and has the following main responsibilities:

- Monitor the Group's activities in the field of compliance;
- Ensure the effective operation of the compliance system and propose potential improvements;
- Review complaints and semi-annual reports submitted by Compliance Officers;
- Promote training and communication initiatives in this area.

COMPLIANCE SYSTEM OBJECTIVES

- Ensure the proper functioning of the organization, preventing the commission of illegal acts of any nature and reducing the risk of non-compliance, which can have potential legal, financial, and reputational impacts.
- Regarding corruption, it is important to note that most countries have specific legislation to prevent it, for example, anti-money laundering laws. In many cases, responsibility falls not only on individuals, but also on the companies themselves.
- Complement the principles and rules set forth in the Code of Conduct and Ethics.
- Implement a set of functions and procedures to prevent and respond to situations of non-compliance with the law.

BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

[G1-1]

CODE OF CONDUCT AND ETHICS

In place since 2017, Pestana Hotel Group's Code of Conduct and Ethics (CCE) establishes the ethical principles and standards of behaviour to be adopted by employees and accepted in the performance of their professional activities, in their relationships with one another, and with external stakeholders. This code is consistent with the United Nations Convention against corruption. Any employee or manager may report improper or non-compliant behaviour under the Code to their hierarchical superior. The CCE defines a set of conflict-of-interest situations that employees must recognize and observe, in line with compliance legislation, especially regarding politically exposed persons. New employees are introduced to the Code during their onboarding process.

The fundamental ethical principles that guide the Group’s activities are:

- Integrity and compliance with the law**, ensuring that all activities are conducted ethically and legally, reflecting the Group’s commitment to integrity and fairness;
- Accuracy and truthfulness** in the preparation and reporting of data, ensuring complete, precise, and reliable business records;
- Protection of assets**, requiring that Pestana Hotel Group’s material and intellectual property be treated with honesty and not used inappropriately, nor obtained through theft, fraud, or falsification;
- Confidentiality**, through the obligation to maintain the confidentiality of information relating to Pestana Hotel Group or third parties;
- Avoidance of conflicts of interest**, ensuring decisions are made in the interest of Pestana Hotel Group, not for personal or external gain;
- Integrity in negotiations**, ensuring dealings with third parties are conducted with honesty and good faith, without taking unfair advantage;
- Loyalty**, meaning that no one may personally profit from any business opportunity belonging to Pestana Hotel Group;
- Respect and dignity**, in interactions with colleagues and third parties connected to Pestana Hotel Group;
- Workplace safety**, through behaviours that promote a secure environment free from risk, violence, or threats, and ensuring no one works under the influence of alcohol or illegal drugs;
- Individual responsibility**, acknowledging that everyone is accountable for the legality and ethics of their actions and their consequences.

STANDARDS OF CONDUCT

The standards of conduct set out in the Code of Conduct and Ethics guide the behaviour of both permanent and seasonal employees working in the 16 countries where the Group operates. These standards apply across the following areas:

Business record keeping	Assets	Technological resources	Confidential and privacy information
Workplace relationships	Discrimination, moral and sexual harassment, and retaliation	Environment, health, and safety at work	Prevention of workplace violence
Illegal drugs, alcohol misuse, and fitness for work	Response to authorities, the press, and other entities	Contract execution	Acceptance or solicitation of gifts
Conflicts of interest	Protection of employees reporting misconduct	Clarity on values and policies	

WHISTLEBLOWER PROTECTION POLICY

A Whistleblower Protection Policy for good-faith reporting has been in place since 2022 and guarantees anonymity.

A whistleblowing channel has been established, managed by an external entity, which receives, and forwards reports to Pestana Hotel Group, ensuring the anonymity of the whistleblower.

The company follows established procedures for investigating incidents of business misconduct, including corruption and bribery, through disciplinary processes provided under the Labor Code and, when applicable, the Commercial Companies Code. Decisions are communicated to the Compliance Officer, who subsequently informs the reporting party of the outcome. Procedures to prevent, detect, and respond to conflicts of interest are defined in the CCE, ensured through compliance with legal requirements on Board members' interest declarations, ultimate beneficial ownership information, and politically exposed persons, as well as the operation of the whistleblowing channel.

EMPLOYEE HANDBOOK AS A TOOL FOR CORPORATE CULTURE AND CONDUCT

Pestana Hotel Group Employee Handbook is an internal guide that informs employees about the culture, principles, operations, and standards of the organization. Its main objective is to support the integration of new employees and to reinforce corporate culture. It is an essential tool for ensuring behaviour aligned with the Group's values, and for maintaining an ethical, inclusive, and efficient work environment.

Within the governance framework, the handbook includes key content such as the identity and guiding principles of the organization (manifesto, purpose, vision, and values); and a description of the governance model, emphasizing transparency, accountability, and ethical management. Additionally, the handbook compiles a set of policies and procedures that structure business conduct and ensure respect for fundamental labour rights, including:

- Disciplinary Policy and Procedure;
- Grievance Policy and Procedure;
- Equal Opportunities Policy;
- Anti-Bullying Policy;
- Whistleblower Protection Policy;
- Health and Safety Policy.

ANTI-CORRUPTION AND ANTI-BRIBERY PREVENTION AND MONITORING

The procedures currently in place to prevent, detect, and respond to conflicts of interest are outlined in the CCE and are ensured through compliance with applicable legislation. This includes the declaration of interests by Board members, disclosure of the ultimate beneficial owner, declarations concerning politically exposed persons, and the operation of the whistleblowing channel. At present, the inquiry committee for reports and incidents of this nature is not yet independent from the management chain involved in the reported matter. The results of these procedures are communicated through annual reports on the implementation and effectiveness of the Compliance Manual, which are submitted to the various Boards of Directors and the Executive Committee.

WHISTLEBLOWING CHANNEL

To implement the Whistleblower Protection Policy, the Group has established a secure and accessible internal whistleblowing channel, available to any employee, regardless of the type of employment relationship, as well as to external third parties, including suppliers, customers, or other business partners. The channel may be used whenever there is knowledge or suspicion of violations of legal, regulatory, or internal standards by employees or third parties connected to the Group.

Complaints are received by an independent external entity, acting as the Compliance Officer, who ensures the anonymity of the whistleblower. Once registered, the report is forwarded anonymously to Pestana Hotel Group, which then conducts the necessary investigations, inquiries, or proceedings to determine the appropriate response. The decision is subsequently communicated to the Compliance Officer, who in turn informs the whistleblower of the outcome of the process.

FUTURE OUTLOOK

The implementation of these instruments will be fundamental to ensuring compliance with the national legislation transposing Directive (EU) 2019/1937, fostering a fair, safe, and ethical work environment, and preventing practices harmful to the business. These measures aim to protect functions most exposed to corruption and bribery risk, particularly the Executive Committee and the Legal, IT, Operations, Communications, Marketing and Sales, Human Resources, and Finance departments. The Group will continue to review and enhance these tools as needed, in line with governance best practices. Although a specific training program on anti-corruption and related topics is not yet in place, the Group plans to include these subjects in the training programs for higher-risk functions in 2025, in alignment with the entry into force in of Decree-Law No. 109-E/2021 of December 9 (Portugal).

Value chain management

[ESRS G1]

Pestana Hotel Group operates across diverse geographical, economic, and social contexts, which adds a level of complexity to value chain management. Operating in multiple countries requires greater attention to risks associated with supply disruptions, variations in product quality, or unsustainable practices that could compromise operations and impact the brand's reputation. Aware of these challenges, Pestana Hotel Group recognizes that effective value chain management is essential to mitigate such risks, ensure operational stability and safety, and maintain product quality.

Pestana Hotel Group’s strategy was designed with the purpose of generating and enhancing positive impacts associated with business conduct, such as good practices for supplier payments and economic development with preference for local suppliers. The Group also aims to manage any potential financial effects, such as reputational risks or higher purchasing costs related with the integration of ESG aspects. This approach is guided by the analysis of IROs, conducted in line with the CSRD’s dual materiality principles, which allows us to anticipate challenges and strengthen the organization’s resilience.

SUPPLIER RELATIONSHIP MANAGEMENT

Although the Group does not yet have a formal policy dedicated to this topic, these key considerations are already reflected in the most critical clauses of the General Supply Agreements established with each supplier.

PREFERENCE FOR LOCAL SUPPLIERS AND SUPPLY CHAIN MONITORING

Within this framework, the Group is committed to prioritizing the selection of local suppliers whenever possible. This practice not only strengthens the Group’s integration within the communities where it operates, but also contributes actively to local economic development, fostering the creation of shared value. The focus on local sourcing also helps reduce GHG emissions associated with the transportation of goods and services, while enhancing the resilience of the supply chain.

To maintain cohesion and transparency across its supply network, the Group conducts visits to the facilities of its most relevant suppliers whenever necessary. These visits allow for direct monitoring of operations, facilitating the assessment of compliance with contractual, legal, and ethical requirements, as well as the identification of opportunities for improvement and collaboration toward the adoption of more sustainable practices.

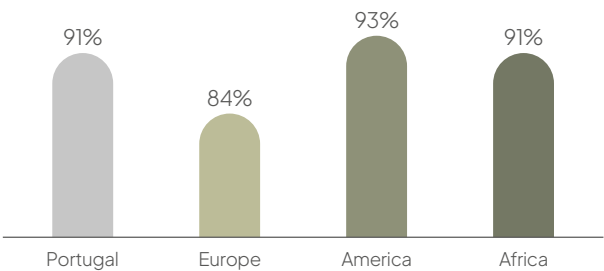
LOCAL SOURCING AND SUPPLY CHAIN MANAGEMENT



90%

of Pestana Hotel Group purchases are from local suppliers

DISTRIBUTION OF LOCAL SOURCING BY AREA



PAYMENT PRACTICES WITH SUPPLIERS

The Group is committed to maintaining close and trusting relationships with its suppliers. To this end, it establishes standard payment conditions in agreement with them and follows a set of internal guidelines designed to minimize potential delays.

It is important to note that payment terms vary not only according to the category of services or products purchased, but also depending on the region of operation. For example, all payments in Africa, United States of America, and Europe are made within 15 to 30 days, while in Portugal, the payment period ranges between 30 and 75 days.

The calculation of the average payment period and percentage of alignment was based on a comprehensive analysis of all supplier invoices recorded in 2023 and 2024 across all Pestana Hotel Group companies, except for operations in Brazil. Invoices related to intercompany transactions and employee expenses were also excluded from this analysis.

Data Protection and Cybersecurity

[Entity Specific Topic - MDR]

PRIVACY AND DATA PROTECTION POLICY

Pestana Hotel Group holds personal data protection and cybersecurity as priorities, and is committed to safeguarding the information of guests, employees and partners. Therefore, the Group maintains an active and up-to-date Privacy and Data Protection Policy, available at www.pestana.com/en/privacy-policy, which defines the principles and rules applicable to the processing of personal data in accordance with the General Data Protection Regulation. This policy establishes the purposes of processing, the rights of data subjects, the technical and organisational measures applied to ensure the confidentiality and integrity of information, as well as the procedures for reporting and managing incidents.

MANAGEMENT AND APPROACH TO DATA PROTECTION AND CYBERSECURITY

Pestana Hotel Group's strategy was designed with the purpose to generate and enhance positive impacts associated with the maintenance of privacy of customer data as well as strengthening of technological resilience. The Group also aims to manage and enhance any potential financial effects, such as operational disruptions due to cyber-attacks, loss of customer trust due to sensitive data loss or security breaches and greater investment in cybersecurity systems to prevent financial and operational losses. This approach is guided by the analysis of IROs, conducted in line with the CSRD's dual materiality principles, which allows us to anticipate challenges and strengthen the organization's resilience.

DATA PROTECTION AND CYBERSECURITY TRAINING PROGRAMME

In 2024, the Group developed and delivered a five-episode training programme on data protection and information security, led by the IT teams under the CIO's supervision in collaboration with Human Resources. Mandatory for Shared Services, Front Office and unit management and recommended for all employees, it covered the internal code of conduct, key cyber threats and the procedures to follow in case of suspected cyberattacks or data breaches, strengthening digital literacy and reinforcing prevention practices aligned with the Group's security standards.

Innovation and Technology

[Entity Specific Topic – MDR]

INNOVATION AND TECHNOLOGY FOCUS AND INVESTMENT

The hospitality business continuously seeks to improve the experience of both employees and guests, and technology plays a fundamental role in achieving this goal. In the current context, characterized by an abundance of choices and information across multiple channels, it has become essential to simplify customer engagement and automate internal processes. In 2024, the Group invested around €10 million in digital transformation. With the launch of the OPERA Cloud project, the migration of hotel front-office systems to a more advanced version began. At the same time, the Group initiated the revamp Pestana website, with the newest version being officially launched on 16th December, 2024.

MANAGEMENT AND APPROACH TO INNOVATION AND TECHNOLOGY

Pestana Hotel Group's strategy was designed with the purpose of generating and enhancing positive impacts associated with business conduct, such as the integration of new technological solutions into the service, contributing to consumer comfort and greater environmental performance. The Group also aims to manage and enhance any potential financial effects, such as increased competitiveness through investment and integration of technology into products and services in the medium and long term, greatly improving productivity. This approach is guided by the analysis of IROs, conducted in line with the CSRD's dual materiality principles, which allows us to anticipate challenges and strengthen the organization's resilience.

INVESTMENT IN DIGITAL TRANSFORMATION

OPERA CLOUD

The introduction of OPERA Cloud marks an important step toward the integration of a single, unified system that will bring significant improvements to the Group's operations, enhancing connectivity and integration, process management, and the efficiency and agility of daily activities.

By the end of 2024, the system was connected to more than 30 units across the regions of Lisbon, Porto, Madeira, and Azores, with rollout to the remaining units already under preparation, following context-specific implementation approaches.

Although the full effects of this investment will only become visible once the system is fully operational, immediate benefits have already been observed in several areas, such as reducing the effort required for website booking audits, simplifying room assignment and check-in/check-out processes, and increasing sales autonomy.

In a changing world, Pestana Hotel Group is ready to leverage the digital transformation required to stay competitive, through the integration of new technologies and adaptation of people. Technology will transform the way everyone works, enhancing the customer's experience and improving internal productivity.

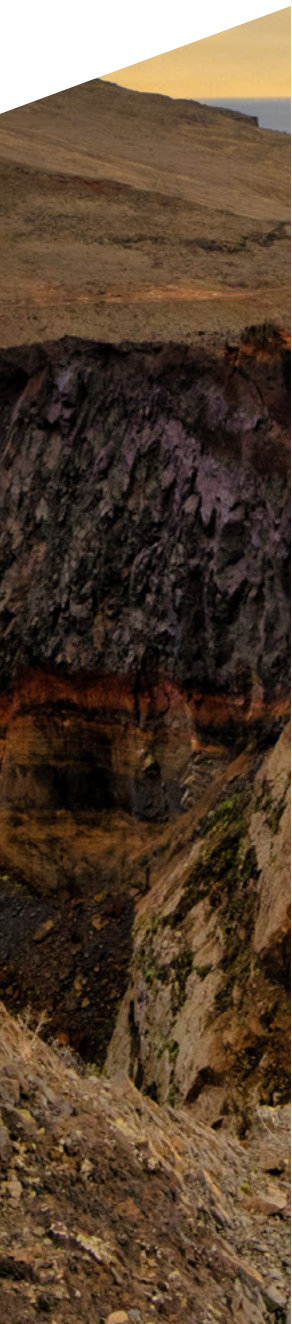
REDESIGN OF THE WEBSITE PESTANA.COM

With the goal of providing a more interactive, aspirational, and customer-aligned browsing experience, the www.pestana.com website was completely redesigned. The platform now features fewer menus, a simpler design, and intuitive navigation, with greater emphasis on destinations and experiences available to guests.

Given Pestana Hotel Group's global presence, adapting the website to different markets was also crucial. To ensure a personalized and relevant experience, the website is available in six languages, presented in a contextualized manner that respects the cultural and linguistic characteristics of each market.

The new platform positions itself as an essential touchpoint with the Group's customers, offering a user-friendly experience that elevates the trip planning and booking process to a new level. Whether discovering top destinations, planning the perfect holiday, or exploring culinary experiences, the new website reflects the Group's innovative vision and its commitment to providing unique stays.

4. THE ROLE OF PESTANA IN BUILDING A SUSTAINABLE FUTURE



Pestana Hotel Group reaffirms its commitment to integrating sustainability as an essential part of the way it operates and grows. The Group's long-term vision is grounded in the creation of responsible value, a value reflected in how it manages its resources, cares for people, and protects the destinations where it operates.

In 2024, the foundations supporting this commitment were strengthened, with more robust processes, more consistent information, and greater coordination across different business areas.

The double materiality analysis carried out in 2025, and used to guide the 2024 reporting, was particularly significant in this context, as its introspective nature allowed the Group to reflect on the most relevant topics for the continuity and resilience of the business.

This consolidation provides a foundation for the next step: progressing towards the definition of an integrated sustainability strategy, intended to reflect the material topics identified and the Group's strategic priorities for the coming years.

The strategy is expected to set out goals and action lines to support and guide the Group's ESG performance. In parallel, the Group's governance instruments such as codes, policies and procedures, may be reviewed and updated over time, to strengthen alignment with the principles of ethics, integrity and responsibility that underpin Pestana Hotel Group.

Through this evolution, the Group reinforces its active role in building a more sustainable future for tourism, seeking to balance growth and responsibility, experience and positive impact.

ANNEX

Correspondence Table ESRS

ID	Topic	Information 2024	Location
SBM-1	Strategy, business model and value chain		
SBM-1_02	Relevant markets and customer groups	Pestana International Holdings S.A.'s origin dates back to 1972 with the establishment of what is today known as Pestana Carlton Madeira hotel in Madeira. Pestana Carlton Madeira hotel was the first of the current 110 units of touristic lodging now being operated by the Group in 16 countries. Its core business is the hotel business, where it operates through 4 brands (Pestana Hotel & Resorts, Pestana Collection, Pousadas de Portugal and Pestana CR7 Lifestyle), but is complemented by other activities such as real estate, beverages, vacation club, golf and entertainment, based on its strategy of diversifying risk not only in geographical terms, but also in different business segments. Therefore, Pestana Hotel Group has a very diverse customers, with guests coming from different parts of the world. The main source markets, apart from Portugal, are United Kingdom, United States and Germany. In Portugal, the Group is specialized in resort hotels, historical landmarks known as Pousadas de Portugal and urban hotels in Lisbon and Oporto. Internationally, the Group has focused over the last decade on expanding its presence in major cities across Europe and North America. Key locations include London, Berlin, Miami, Amsterdam, Barcelona, Madrid, New York and Orlando, with forthcoming developments in Manchester and Paris.	1.1. Pestana Hotel Group History 1.2. Pestana Universe
SBM-1_09	Participation in the fossil fuels sector	The Group is not active in the fossil fuel sector.	-
SBM-1_10	Total revenues derived from coal, oil and gas	The Group has no revenues from coal, oil and gas.	-
SBM-1_11	Revenues derived from coal	n.a.	-
SBM-1_12	Revenues derived from oil	n.a.	-
SBM-1_13	Revenues derived from gas	n.a.	-
SBM-1_14	Revenue derived from gas-related activities aligned with the EU Taxonomy	n.a.	-
SBM-1_15	Activity in the chemicals sector	n.a.	-
SBM-1_16	Revenue from the production of chemicals	n.a.	-
SBM-1_17	Activity in the defence sector	n.a.	-
SBM-1_18	Revenue related to the defence sector	n.a.	-
SBM-1_19	Activity in the tobacco sector	n.a.	-
SBM-1_20	Revenue from the extraction and production of tobacco	n.a.	-

ID	Topic	Information 2024	Location
SBM-1_25	Business model and value chain	Pestana Hotel Group which origin dates to 1972, develops its activity in the Hospitality business and is led by its shareholder, Dionísio Fernandes Pestana, son of the founder of the Group. The Group is present in 16 countries spread out across various regions, namely Europe, United States, Africa and South America. The Group operates under various brands, such as Pestana Hotels & Resorts, Pestana CR7 Lifestyle Hotels, Pestana Collection Hotels and Pestana Pousadas de Portugal, serving different market segments, with a diversified offer that includes city hotels, holiday resorts and boutique accommodation in premium destinations in Portugal and abroad. The internationalization was initiated in the 1990's through investments in Portuguese speaking countries, first in Africa and then in Brazil. In the last 10 years the development strategy has focused on enlarging the Group's footprint throughout major European and North American cities such as London, Berlin, Miami, Amsterdam, Barcelona, Madrid and New York. Pestana Hotel Group adopts an asset-based model, following a growth strategy that involves significant investment volumes with long payback periods and, therefore, associated with medium and long-term financing sources, preferably with fixed interest rate. Additionally, considering the widespread geography of these investments, there are some restrictions on free movement of capital which originates treasury excesses and needs with disparate behaviours at the same time. On the other hand, the hotel business presents a significant exposure to the variability of economic cycles and significant seasonality. However, this risk is minimized by the fact that Pestana Hotel Group has a significant variable cost structure, which allows for more flexibility. These factors are determinant in defining Pestana Hotel Group's financial risk management policy. This policy aims, above all else, to ensure the significant reductions of these risks in a prudent way, searching to focus on efficient hotel business management itself and ensuring to each new significant investment its medium and/or long-term financial structure and whenever possible with fixed rate interest. Pestana Hotel Group is a Group focused on hotel business, but complemented by other activities such as timeshare, real estate, residence, golf, entertainment and also includes an investment in industry. During the last years, the Group continued to follow its risk diversification strategy, not only in referred activities, but also in geographic terms, such as the residential and real estate business. The results obtained contributed to spread the risk and reduce the Group's dependence on the hospitality business. The Group continues to focus on the development of its employees by providing them with improved working and remuneration conditions, including profit-sharing, and developing initiatives to attract, retain and develop talent along with various programmes that encourage mobility and the spirit of cooperation between people. Our commitment to human capital combined with a strong, permanent investment in state-of-the-art technology and process rationalisation seeks to create conditions to ensure the permanent creation of value, appeal and sustainability of our operations. The Group's value chain is based on solid relationships with local and global suppliers and strategic partnerships. The company seeks to create shared value through environmental, social and economic practices, investing in energy efficiency, emissions reduction and community initiatives.	1.2. Pestana Universe 3.3. Governance: leading responsibly and innovatively > Value chain management
SBM-1_28	Characteristics of the value chain	The Group's value chain is built upon strong relationships with both local and global suppliers, as well as strategic partnerships. The company is committed to generating shared value by integrating sustainable environmental, social, and economic practices. This includes investments in energy efficiency, efforts to reduce emissions, and support for community-based initiatives.	3.3. Governance: leading responsibly and innovatively > Value chain management
SBM-2	Interests and views of stakeholders		
SBM-2_01	Company engagement with stakeholders	Customers: satisfaction surveys and online feedback analysed. Employees: annual satisfaction survey. Suppliers: open communication channel with suppliers managed by the Procurement department, which coordinates and communicates opportunities and constraints from both sides. Community: the Group has members participating in organisations such as GRACE, BRP and Smart Waste. Financial institutions: frequent communication through the Treasury department Shareholder: part of the daily operations.	2.3. Stakeholders

ID	Topic	Information 2024	Location
SBM-2_03	Categories of stakeholders involved	Pestana Hotel Group recognizes the following groups as its main stakeholders: -Customers: at the heart of the Group's value proposition, they are fundamental to the sustainability of the business and to the continuous innovation of the products and services offered. -Employees: represent the human capital that underpins daily operations, strategic development and commitment to excellence and hospitality. -Suppliers: local and global, with whom the Group maintains relationships based on trust, quality, responsibility and sustainability principles. -Society: the local communities where the Group operates, with whom it is committed through social, environmental and cultural initiatives. -Financial institutions: provide the financial support necessary for the sustainable growth of the business.	2.3. Stakeholders
SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model		
SBM-3_01	Location of material impacts in the value chain	Pestana Hotel Group's main material impacts are located both upstream and downstream in the value chain. Upstream, the most relevant impacts are associated with the procurement of goods and services, with potential environmental and social effects across global supply chains. Downstream, the impacts are concentrated in hotel and tourism operations, through energy and water consumption, waste management, guest mobility, and the Group's influence on the economic and social development of local communities.	3.3. Governance: leading responsibly and innovatively > Value chain management
SBM-3_04	Impacts on people and the environment	The most relevant negative impacts include the intensive consumption of natural resources (energy and water), waste generation and management, and greenhouse gas emissions, as well as the risk of increased pressure on local ecosystems in tourism destinations. Conversely, Pestana Hotel Group generates significant positive impacts by promoting local employment, regional economic development, and the enhancement of the cultural and natural heritage of the destinations in which it operates.	3. ESG Performance
SBM-3_05	Relation to strategy and business model	The impacts are linked to the business model and consider the Group's activity businesses (Hospitality and Vacation Club, Real Estate, entertainment, beverages and golf). The management of these impacts has been ensured and incorporated into the Group's strategy, which increasingly integrates sustainable practices from both an environmental and social perspective. These decisions influence hotel operations, both in terms of logistics and in the development of policies applied across all units.	1.2. Pestana Universe 2.2. Sustainability governance
SBM-3_07	Activities affected by the impacts	The most affected activities include energy and waste management, the maintenance and operation of tourism facilities, and the food supply chain. Regulatory and climate-related changes may affect operational costs and resource availability, encouraging the adoption of more sustainable solutions such as energy-efficiency systems, renewable energy sources, and circular-economy practices.	-
SBM-3_08	Current financial effects	The material risks and opportunities identified for Pestana Hotel Group are already reflected in concrete financial effects on its operations. The increase in energy costs and the volatility of electricity and fuel prices have a direct impact on operating margins and operating results, particularly in units with higher energy intensity. Exposure to physical risks arising from climate change – such as extreme weather events – implies potential maintenance costs and additional investment in resilient infrastructure. On the other hand, opportunities linked to energy efficiency and the transition to renewable sources result in reductions in operating costs, the appreciation of hotel assets, as well as eligibility for green funding and financing. Investment in technological innovation and process digitalisation has contributed to optimising management and reducing operating expenses, strengthening competitiveness. The growing demand for sustainable destinations and accommodation represents an opportunity for additional revenue generation, with a positive impact on occupancy and average daily rates. Overall, these factors influence the Group's current financial performance, reflected in operating costs, investments and cash flows, as well as in the long-term valuation of the Group's portfolio.	-

ID	Topic	Information 2024	Location
SBM-3_10	Resilience of the business model	Pestana Hotel Group's business model demonstrates strong resilience, supported by geographic and segment diversification (Hospitality and Vacation Club, Real Estate, entertainment, beverages and golf) and by the progressive integration of energy-efficiency measures, renewable energy solutions and climate-risk management practices. The solid financial structure and access to financing instruments strengthen the Group's capacity to invest and to adapt to cost fluctuations and regulatory requirements. The Group maintains asset-modernisation plans and continuous monitoring of environmental and social risks, ensuring operational stability and long-term competitiveness.	1.2. Pestana Universe 2.2. Sustainability governance
GOV-1	Role of the administrative, management and supervisory bodies		
GOV-1_01	Number of executive members in governance bodies	3	-
GOV-1_02	Number of non-executive members in governance bodies	2	-
GOV-1_03	Worker representation in governance bodies	There is no representation at the management or executive levels, but it does exist at the oversight level. This is specifically the case of the Workers' Committee representative who participates in the supervision of the Grupo Pestana Pousadas employees' Pension Fund.	-
GOV-1_04	Relevant experience of the members of the governance bodies	The Board's diversity of skills, experience and background strengthens Pestana Hotel Group's competitive advantage. Our Board of Directors brings together a wide range of skills relevant to our business, long-term strategy, risks and global activities. These skills include CEO leadership, hospitality and real estate operations, international experience, government relations, risk management, finance and technological innovation. In addition, all Board members are highly sensitive to sustainability and related issues and are committed to achieving the objectives set. Their knowledge of environmental management, climate change initiatives, human resources development and social responsibility enable them to address the key sustainability concerns of our stakeholders.	-
GOV-1_05	Gender diversity and other aspects in governance bodies	Male - 80% Female - 20%	3.2. People: valuing those who shape our story
GOV-1_07	% of independent members on the Board of Directors	Dependent - 40% Independent - 60%	-
GOV-1_08	Identification of those responsible for overseeing impacts, risks and opportunities	The Board of Directors of Pestana International Holdings S.A. (PIH) controls and supervision, delegating the daily management of the Group to the Executive Committee, which is chaired by the CEO. The Executive Committee is composed of directors responsible for various functional areas, including Operations, Marketing, Sales, IT, Human Resources, Finance, Maintenance and Legal, who are highly specialized professionals with extensive experience and in-depth knowledge of the industry, and who play a critical role in the formulation and implementation of sustainability policies. With its high level of expertise, the Committee is able to analyse risks, impacts, and opportunities, adopting a proactive and effective approach to sustainability management, while ensuring that environmental, social, and governance impacts are strategically and responsibly managed in line with industry best practices. In addition, the Executive Committee closely supervises the execution of sustainability strategies, with transparent communication and constant updating of best practices in the industry. This process involves fully integrating sustainability issues into all areas of the company, from top management to operations.	2.2. Sustainability governance

ID	Topic	Information 2024	Location
GOV-1_09	Formal responsibilities for impacts, risks and opportunities	The Board continuously analyses the Group's governance practices, assesses the regulatory and legislative environment and adopts governance practices that best serve the interests of the shareholder. The Board of Directors is elected by the Group's shareholder, Dionísio Pestana, who chairs the Board. The Group's business is managed by the managers and directors, under the direction of the Chief Executive Officer (CEO) and the supervision of the Executive Committee, to increase the long-term value of the company for its shareholder. In Pestana Hotel Group, the Chairman of the Board of Directors is the Group's shareholder, Dionísio Pestana, whose main role is to lead the Group in the following areas: strategic issues, particularly in terms of the Group's expansion, and to monitor the performance of the business in relation to the objectives set. The Group's CEO is José Theotónio, whose main role is to lead the Group towards excellence and focus on sustainable growth. The Board monitors the performance of the CEO and other members of management to ensure that the long-term interests of the shareholder are served.	2.2. Sustainability governance
GOV-1_13	Integration of internal controls into impact management	Risk management is an integral part of the activities of Pestana Hotel Group's Executive Committee. The Board defines expectations and oversees this risk management, which serves as a fundamental basis for defining strategy and planning. The Group's CEO takes responsibility for closely monitoring the management of impacts, risks, and opportunities. This is carried out through Executive committee meetings, and based on the identified risks, responsibilities are delegated to other experienced and highly skilled Directors to ensure proper follow-up.	2.2. Sustainability governance
GOV-1_14	Oversight of targets and progress related to impacts, risks and opportunities	The Executive Committee meets weekly to ensure efficient management. The Executive Committee meets regularly to set targets for the strategic sustainability objectives and to assess the material risks and opportunities relevant to the business. Once the targets have been set, the Executive Committee monitors progress in their implementation, ensuring that the objectives are met and adjusted if necessary to ensure continued commitment to sustainability and the creation of long-term value. The regular frequency of these meetings allows the Executive Committee to act as the Group's core decision-making body, ensuring that strategic and decision-making processes are carried out with a higher level of consensus and transparency. This structure promotes a clear and effective decision-making process, contributing to the long-term sustainability and success of Pestana Hotel Group.	2.2. Sustainability governance
GOV-1_15	Assessment of the availability or need for developing sustainability competencies	The executive committee is fully committed to developing the necessary skills to oversee and drive forward the sustainability agenda, recognizing its strategic importance for the Group's future. For several years now, Pestana Hotel Group has been developing continuous and consistent work in sustainability topics, which has always been a fundamental pillar of its business strategy. The CEO leads this effort, promoting internal training and constantly seeking to integrate the best practices in the sector. In addition, the company relies on the support of external consultants when necessary, ensuring that internal skills are continually improved in order to maintain its commitment to environmental, social and governance issues.	2.2. Sustainability governance
GOV-1_16	Sustainability expertise available within the governance bodies		
GOV-2	Information provided to, and sustainability matters addressed by, the company's administrative, management and supervisory bodies		

ID	Topic	Information 2024	Location
GOV-2_01	Information provided to the governance bodies on material impacts, risks and opportunities	The Executive Committee meets weekly to ensure efficient management, and all topics are addressed whenever relevant. Specifically, impacts, risks, and material opportunities are assessed at least once a year, particularly considering the following outputs.	2.2. Sustainability governance
GOV-2_02	Consideration of impacts, risks and opportunities in strategic decisions and risk management	1. Strategic and business level objectives are clearly communicated to and well understood by managers at all levels; 2. Identify risks – Upside and downside risks within each business or functional area, as well as interconnected risks are identified and assigned to risk owners;	
GOV-2_03	List of impacts, risks and opportunities addressed by the governance bodies	3. Analyse risks – Significant risks are further analysed using a variety of risk assessment techniques to articulate key attributes and establish their materiality; 4. Evaluate mitigation plans – Mitigating strategies are selected and evaluated based on their cost benefit; 5. Record and report – Risk outcomes are recorded and reported within business areas and corporate functions, as well as further aggregated at Group level; 6. Review and monitor – Risk information is reviewed and monitored on an ongoing basis, considering the pace of internal and external change	
GOV-5	Risk management and internal controls over sustainability reporting		
GOV-5_01	Review and approval of the sustainability report	The Group has formal processes and policies that guide practices in compliance, ethics, data protection, environment, health and safety, procurement, and labour relations. The reporting of the information provided relies on structured data-collection processes with responsibilities assigned to each functional area, supported by internal controls and monitoring tools.	2.2. Sustainability governance
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities		
IRO-1_01	Methodologies and assumptions used	Pestana Hotel Group's double materiality assessment was conducted in line with the CSRD and the ESRS guidelines, using a structured and participatory methodology. The process began with a sector benchmark to identify relevant sustainability topics in hospitality, food & beverages and golf, with a primary focus on hotel operations. Internal and external interviews were then carried out to collect insights from strategic stakeholders. Subsequently, an internal focus Group and a workshop on impacts, risks and opportunities (IROs) were conducted, applying the double materiality principle to determine the Group's material topics.	2.4. Priorities
IRO-1_02	Process for identifying and prioritising impacts	The impact identification process covered the areas of Hospitality, Food & Beverages and Golf, considering the entire value chain and the main associated ESG topics. Prioritisation was based on criteria of severity and likelihood of occurrence of impacts, complemented by a qualitative assessment of strategic relevance and stakeholder perceptions.	2.4. Priorities
IRO-1_03	Risks or dependencies in the company's activities	The analysis focused on the hospitality operations, recognising this as the core of Pestana Hotel Group's business model, and assessed risks and dependencies related to energy, water and raw-material consumption, waste management and climate change. The Food & Beverages and Golf areas were also considered, identifying critical dependencies on natural resources and external factors such as water availability and fluctuations in tourism demand.	2.4. Priorities
IRO-1_04	Risks or dependencies in the value chain	Risks and dependencies associated with the supply chain were analysed, particularly in the areas of food and beverages, textiles, amenities and maintenance services. The assessment considered environmental aspects (resource use, emissions, transport) and social aspects (labour conditions, ethical practices and compliance).	2.4. Priorities
IRO-1_05	Stakeholder engagement	The process included internal and external interviews with representatives from the Group's key areas and relevant stakeholders, complemented by an internal focus Group and an IROs analysis workshop. This engagement made it possible to gather perspectives on risks, impacts and opportunities, ensuring that the definition of material topics reflected both internal views and external expectations.	2.4. Priorities
IRO-1_06	Process for prioritising negative and positive impacts	The prioritisation of negative and positive impacts was carried out during the internal workshop through the application of criteria such as severity, scope, reversibility and value-creation potential. This collective exercise made it possible to rank the most relevant topics for sustainability and business performance, consolidating the material topics.	2.4. Priorities

ID	Topic	Information 2024	Location
IRO-1_07	Process for assessing risks and opportunities that may have financial effects	Risks and opportunities with potential financial effects were analysed within the context of financial materiality, considering short-, medium – and long-term time horizons.	2.4. Priorities
IRO-1_08	Links between impacts and dependencies	Throughout the process, links between impacts and dependencies across the different areas of activity were identified, highlighting the interrelationship between energy consumption and emissions, resource management and operational costs, and labour practices and service quality. This integrated analysis strengthened the understanding of the cross-cutting effects among environmental, social and economic topics.	2.4. Priorities
IRO-1_09	Process for assessing risks and opportunities	Sustainability risks were prioritised based on their impact and financial materiality, considering their influence on the hotel business and the likelihood of occurrence in other areas of activity. This prioritisation made it possible to position these risks within the existing management mechanisms and the Group's mitigation policies.	2.4. Priorities
IRO-1_10	Prioritisation of sustainability-related risks	Sustainability risks were prioritised based on their impact and financial materiality, considering their influence on the hotel business and the likelihood of occurrence in other areas of activity. This prioritisation enabled these risks to be positioned within existing management mechanisms and the Group's mitigation policies.	2.4. Priorities
IRO-1_11	Decision-making process and internal controls	The results of the analysis were validated by the sustainability and management teams, ensuring their integration into strategic planning and decision-making processes. The materiality assessment now supports the definition of ESG objectives and the continuous monitoring of performance in the areas of hospitality, food & beverages and golf.	2.4. Priorities
IRO-1_14	Parameters used in the materiality assessment	The assessment was based on parameters of severity and likelihood of impacts (for impact materiality) and on potential financial effects (for financial materiality), applied in accordance with the ESRS 1 guidelines. The analyses considered different time horizons and reflected the centrality of hospitality within the Group's business model.	2.4. Priorities
ESRS (BP) – BASIS FOR PREPARATION			
BP-1	General basis for preparation of sustainability statements		
BP-1_01	Basis of consolidation of the sustainability reporting	Pestana Hotel Group's Sustainability Statement is prepared on a consolidated basis, including all entities under the Group's control.	–
BP-1_02	Scope of consolidation	The scope of consolidation is the same as that of the financial statements.	–
BP-1_03	Subsidiaries exempt from sustainability reporting	Sustainability information is reported on a consolidated basis and includes all of the Group's subsidiaries.	–
BP-1_04	Value chain coverage in the sustainability reporting	Pestana Hotel Group's value chain has been gradually incorporated into the Sustainability Statement. The carbon footprint measurement already includes Scope 3, covering all upstream and downstream categories considered relevant for the activities, reflecting efforts to integrate the full value chain into the environmental impact assessment. However, the emissions reduction action plan is still under development and is being adjusted to systematically encompass Scopes 1, 2 and 3, ensuring mitigation of impacts across the entire value chain. Regarding upstream activities, the Group acknowledges that a systematic assessment of suppliers' compliance with sustainability criteria is not yet in place. There are currently no formal policies or established criteria for supplier selection based on ESG topics, though their definition is under consideration for the future.	–
BP-1_05	Sensitive or classified information	No information has been omitted from the Report on the grounds of being considered sensitive or classified.	–
BP-1_06	Future developments or matters under negotiation	Pestana Hotel Group has not exercised the right to refrain from reporting future developments or matters under negotiation.	–

ID	Topic	Information 2024	Location
EI – CLIMATE CHANGE			
EI-1	Transition plan for climate change mitigation		
EI.MDR-P_01	Policies to manage material impacts, risks and opportunities	Pestana Hotel Group has, since 2023, implemented Best Practice Procedures for Energy Consumption, available for consultation by all employees. With the objective of saving energy and water while maintaining the necessary levels of comfort and service for our guests, procedures have been defined for each Operational area (Front Office, F&B, Housekeeping, Maintenance, Spas) and administrative areas, outlining the behaviours and actions that each employee must follow within their respective function. Some of these actions include: 1) Front Office: supervising the lighting and air-conditioning systems in meeting rooms and unoccupied areas; adjusting lighting and HVAC schedules; grouping guest accommodation by floor/area to optimise consumption. 2) F&B: operating kitchen equipment only when at full capacity (dishwashers and glasswashers); managing the use of refrigeration equipment according to occupancy; optimising the use of high-consumption equipment such as ovens and stoves; switching off equipment when not in use. 3) Housekeeping: adjusting thermostats to predefined temperatures during summer and winter; using natural ventilation and daylight whenever possible during room cleaning and preparation. 4) Maintenance: toning equipment operation whenever possible; performing daily inspections of Thermal Centres and Hydropressors to identify water leaks or faulty equipment; conducting monthly checks of pipe insulation for hot and chilled water distribution, heat exchangers, manifolds and others; monitoring boiler and chiller efficiency monthly; controlling and ensuring the proper functioning of thermostats and valves of fan-coils and AHUs; analysing consumption records and proposing optimisation measures. 5) Spas: controlling indoor pool water temperature to <26°C and maintaining similar ambient air temperature; turning on saunas and steam baths only when needed and switching them off after use; turning off entertainment equipment (TVs and sound systems) in gyms and SPA areas when unoccupied. 6) Administrative areas: turning off lighting whenever away from the workplace for more than 10 minutes; switching off HVAC systems during longer absences; turning off computer monitors during long absences and lunch breaks. In 2024, the first version of the Group's Greenhouse Gas Emissions Reduction Action Plan was also presented. This action plan sets a target year of 2030 and includes measures for reducing Scope 1 and 2 emissions, as well as reduction actions for Scope 3. The action plan focuses on measures and objectives across five pillars: Energy, Water, Waste, Procurement and Mobility. 1) Energy: Reduce energy and fuel consumption (including electrification of equipment) and prioritise renewable energy sources. 2) Water: Reduce water consumption and increase the use of alternative water sources. 3) Waste: Reduce waste generated and, when not possible, recycle and/or reuse. 4) Procurement: Reduce the use of high-carbon-footprint foods and select responsible suppliers. 5) Mobility: Reduce the impact of business travel and the Group's vehicle fleet.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-2	Policies related to climate change mitigation and adaptation		
EI-2_01	Policy content	The Group demonstrates its commitment to climate change mitigation and adaptation, as well as to energy efficiency and the use of renewable energy, through the implementation of internal policies and a strategic action plan for the reduction of GHG emissions. These are complemented by employee training initiatives focused on the adoption of environmental best practices.	3.1 Environment: Caring for the planet that welcomes us > Climate Change

ID	Topic	Information 2024	Location
EI-5	Energy consumption and mix		
EI-5_01	Total energy consumption in operations, in MWh	111.690 MWh	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_02	Total energy consumption from fossil sources	32.908 MWh (LPG+Natural Gas+Fuel+Gasoline)	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_03	Total energy consumption from nuclear sources	Not applicable.	-
EI-5_04	Percentage of nuclear energy consumption out of total energy consumption	0%	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_05	Total energy consumption from renewable sources	12.534 MWh	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_06	Consumption of renewable fuels (biomass, biogas, hydrogen, etc.)	9.717 MWh	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_07	Consumption of purchased electricity, heat, steam or cooling from renewable sources	Not applicable.	-
EI-5_08	Consumption of renewable energy from internally generated renewable fuels	Not applicable.	-
EI-5_09	Percentage of renewable energy in total energy consumption	11%	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_10	Consumption of coal-based fuels	Not applicable.	-
EI-5_11	Consumption of oil-based fuels	5.488 MWh (Fuel+Gasoline)	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_12	Consumption of natural gas	14.970 MWh	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_13	Consumption of other fossil fuel sources	12.450 MWh (LPG)	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-5_14	Consumption of electricity, heat, steam or cooling acquired from fossil sources	Not applicable.	-
EI-5_15	Percentage of energy from non-renewable sources in total energy consumption	29%	3.1 Environment: Caring for the planet that welcomes us > Climate Change

ID	Topic	Information 2024				Location	
EI-5_16	Production of non-renewable energy, in MWh	0 MWh				3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-5_17	Production of renewable energy in MWh, including self-consumption.	12 534 MWh				3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-5_18	Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)		M€	MWh	MWh/M€	3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-5_19	Total energy consumption from activities in high climate impact sectors	Hospitality + Vacation Club	453	90,837	200	3.1 Environment: Caring for the planet that welcomes us > Climate Change	
		Beverages	39	12,913	330		
EI-5_20	High climate impact sectors used to determine energy intensity	Considered the Hospitality and Beverages businesses.				3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-5_21	Disclosure of reconciliation to relevant line item or notes in financial statements of net revenue from activities in high climate impact sectors	Reconciled with the revenue line items of the Hospitality business and Beverages segments as disclosed in the financial statements				3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-6_01	Gross Scopes 1, 2, 3 and Total GHG emissions – GHG emissions per scope [table]					3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-6_02	Gross Scopes 1, 2, 3 and Total GHG emissions – financial and operational control	tCO ₂ e	'19	'22	'23	'24	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_03	Disaggregation of GHG emissions – by country, operating segments, economic activity, subsidiary, GHG category or source type	Scope 1	12 410	10 692	8 856	8 507	3.1 Environment: Caring for the planet that welcomes us > Climate Change
		Scope 2	27 396	20 521	19 495	20 523	
		Scope 3	97 983	103 977	143 811	166 204	
		Total emissions	137 789	135 189	172 162	195 234	
EI-6_04	Gross Scopes 1, 2, 3 and Total GHG emissions – Scope 3 GHG emissions (GHG Protocol)					3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-6_06	Gross Scopes 1, 2, 3 and Total GHG emissions – total GHG emissions – value chain	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.				3.1 Environment: Caring for the planet that welcomes us > Climate Change	
EI-6_07	Gross Scope 1 greenhouse gas emissions	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.				3.1 Environment: Caring for the planet that welcomes us > Climate Change	

ID	Topic	Information 2024	Location
EI-6_08	Percentage of Scope 1 GHG emissions from regulated emission trading schemes	0% – The Group's activities are not subject to regulated emission trading schemes.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_09	Gross location-based Scope 2 greenhouse gas emissions	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_10	Gross market-based Scope 2 greenhouse gas emissions	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_11	Gross Scope 3 greenhouse gas emissions	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_12	Total GHG emissions location based	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_13	Total GHG emissions market based	Answered in the indicators EI-6_01; EI-6_02; EI-6_03; and EI-6_04.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_14	Disclosure of significant changes in definition of what constitutes reporting undertaking and its value chain and explanation of their effect on year-to-year comparability of reported GHG emissions	Between 2023 and 2024, the reporting structure for emissions was revised to include only companies under the effective control of Pestana International Holdings S.A.. This change may affect the year-to-year comparability of reported GHG emissions.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_15	Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions	In calculating the Pestana Group's greenhouse gas (GHG) emissions, the GHG Protocol methodology was used as the primary reference, specifically the "GHG Protocol Corporate Accounting and Reporting Standard". This standard was applied to account for all emissions under Scope 1 (direct emissions from sources controlled by the Pestana Group) and Scope 2 (indirect emissions from the generation of purchased energy consumed by the Group). Additionally, the "GHG Protocol Corporate Value Chain (Scope 3) Standard" (2011) was used to account for all Scope 3 emissions (indirect emissions occurring across the Pestana Group's value chain). The emission factors (EFs) applied are aligned with methodologies proposed by the Intergovernmental Panel on Climate Change (IPCC). Whenever possible, they were adapted to the national context by the Portuguese Environment Agency (APA) and published in the National Inventory Report (NIR). A geographic hierarchy was used when selecting EFs: national factors were prioritised; where these were unavailable, European factors – namely those published by the Department for Environment, Food and Rural Affairs (DEFRA) – were used; and only in the absence of suitable alternatives were internationally recognised sources considered.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_16	Disclosure of the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements	Between the reporting dates of the entities in our value chain and the date of the Group's financial statements, no significant events or changes were identified that could materially impact the reported greenhouse gas (GHG) emissions. Therefore, the emissions data presented reflect the most updated and robust information available as of the reporting date.	3.1 Environment: Caring for the planet that welcomes us > Climate Change

ID	Topic	Information 2024	Location
EI-6_17	Biogenic emissions of CO ₂ from the combustion or biodegradation of biomass not included in Scope 1 GHG emissions	Not applicable.	-
EI-6_18	Percentage of contractual instruments, Scope 2 GHG emissions	Not applicable.	-
EI-6_19	Disclosure of types of contractual instruments, Scope 2 GHG emissions	Not applicable.	-
EI-6_20	Percentage of market-based Scope 2 GHG emissions linked to purchased electricity bundled with instruments	Not applicable.	-
EI-6_21	Percentage of contractual instruments used for sale and purchase of energy bundled with attributes about energy generation in relation to Scope 2 GHG emissions	Not applicable.	-
EI-6_22	Percentage of contractual instruments used for sale and purchase of unbundled energy attribute claims in relation to Scope 2 GHG emissions	Not applicable.	-
EI-6_23	Disclosure of types of contractual instruments used for sale and purchase of energy bundled with attributes about energy generation or for unbundled energy attribute claims	Not applicable.	-
EI-6_24	Biogenic emissions of CO ₂ from combustion or bio-degradation of biomass not included in Scope 2 GHG emissions	Not applicable.	-
EI-6_25	Percentage of GHG Scope 3 calculated using primary data	Close to 100% of the Pestana Group's Scope 3 emissions were calculated using primary data. Primary data included both financial activity data (e.g., expenditure, procurement records) and physical activity data (e.g., quantities of goods and services, employee activity data). The only use of secondary data occurred in Category 11 (Use of Sold Products). Given the very low materiality of this category relative to total Scope 3 emissions, the effect of using secondary data is considered negligible. Although primary data cover almost the entire Scope 3 inventory, part of this information is estimated through extrapolation (e.g., Categories 6 and 7), following GHG Protocol-aligned estimation methods. These estimates do not change the classification of the underlying datasets as primary data, as they originate from internal sources and activity records.	3.1 Environment: Caring for the planet that welcomes us > Climate Change

ID	Topic	Information 2024	Location
EI-6_26	Disclosure of why Scope 3 GHG emissions category has been excluded	Category 4: Upstream Transportation and Distribution – This category was not calculated due to a lack of available data for the reporting year. Data collection processes are being strengthened, and this category is planned for inclusion in the 2025 GHG inventory. Category 8: Upstream Leased Assets – This category is not applicable, as the Pestana Group does not operate upstream leased assets. Category 10: Processing of Sold Products – This category was excluded due to its immaterial impact. Estimated emissions totalled approximately 2 tCO₂e, representing a negligible share of the overall Scope 3 inventory. Category 14: Franchises – This category is not excluded. The Pestana Group includes franchise units within its organisational boundary and reports their emissions as part of the overall corporate footprint. Category 15: Investments – This category does not apply, as the Group does not hold investments that fall under the Scope 3 category definition.	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_27	List of Scope 3 GHG emissions categories included in inventory	Category 1: Purchase of goods and services Category 2: Capital goods Category 3: Activities related to fuels and energy (not included in Scope 1 or 2) Category 5: Waste generated in operations Category 6: Business travel Category 7: Employee commuting Category 9: Downstream transportation and distribution Category 11: Use of sold products Category 12: End-of-life treatment of sold products Category 13: Downstream leased assets	3.1 Environment: Caring for the planet that welcomes us > Climate Change
EI-6_28	Biogenic emissions of CO ₂ from combustion or bio-degradation of biomass that occur in value chain not included in Scope 3 GHG emissions	Not applicable.	–
EI-6_29	Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions	For the 2024 GHG inventory, a mixed boundary approach was applied. An operational control method was used for the majority of Pestana Group entities, while a financial control method was applied to ECM. Although the Pestana Group does not exercise operational control over ECM, it holds financial control; therefore, ECM's emissions were included in the inventory. All geographies and all business sectors within the Group were considered in the calculation of Scope 3 emissions. Across most Scope 3 categories, primary data were used whenever available and multiplied by the corresponding emission factors. Emission factors based on life-cycle assessment (LCA) methodologies were prioritised, as they provide higher accuracy and reflect full life-cycle impacts. In cases where no physical-quantity LCA factors existed, an environmentally extended input-output (EEIO) approach was applied. The EEIO method was used exclusively for Categories 1 and 2. Estimation methods were applied where direct data were not available, following assumptions aligned with the GHG Protocol. The main methodological limitations relate to the availability of primary data across parts of the value chain and the need for modelled data in specific categories.	3.1 Environment: Caring for the planet that welcomes us > Climate Change

ID	Topic	Information 2024	Location																												
EI-6_30	GHG emissions intensity, location-based (total GHG emissions per net revenue)	<table><tr><th></th><th colspan="3">Hospitality + Vacation Club</th><th colspan="3">Beverages</th></tr><tr><th>Scope 2</th><th>tCO₂e</th><th>€</th><th>tCO₂e/M€</th><th>tCO₂e</th><th>€</th><th>tCO₂e/M€</th></tr><tr><td>Location-based</td><td>17 436</td><td>453 366 014</td><td>38,5</td><td>1814</td><td>39 138 859</td><td>46,3</td></tr><tr><td>Market-based</td><td>16 174</td><td>453 366 014</td><td>35,7</td><td>1814</td><td>39 138 859</td><td>46,3</td></tr></table>		Hospitality + Vacation Club			Beverages			Scope 2	tCO ₂ e	€	tCO ₂ e/M€	tCO ₂ e	€	tCO ₂ e/M€	Location-based	17 436	453 366 014	38,5	1814	39 138 859	46,3	Market-based	16 174	453 366 014	35,7	1814	39 138 859	46,3	3.1 Environment: Caring for the planet that welcomes us > Climate Change
	Hospitality + Vacation Club			Beverages																											
Scope 2	tCO ₂ e	€	tCO ₂ e/M€	tCO ₂ e	€	tCO ₂ e/M€																									
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Market-based	16 174	453 366 014	35,7	1814	39 138 859	46,3																									
EI-6_31	GHG emissions intensity, market-based (total GHG emissions per net revenue)		3.1 Environment: Caring for the planet that welcomes us > Climate Change																												
EI-6_32	Disclosure of reconciliation to financial statements of net revenue used for calculation of GHG emissions intensity	Consolidated financial statements of Pestana International Holdings, Chapter 29, page 105	3.1 Environment: Caring for the planet that welcomes us > Climate Change																												
EI-6_33	Net revenue		3.1 Environment: Caring for the planet that welcomes us > Climate Change																												
EI-6_34	Net revenue used to calculate GHG intensity																														
EI-6_35	Net revenue other than used to calculate GHG intensity																														
E3 – WATER AND MARINE RESOURCES																															
E3-1	Policies related to water and marine resources																														
E3.MDR-P_01-06	Description of Policies related to Water Management	2024 was a year marked by a strong focus on Water Efficiency Management. Resolution of the Council of Ministers no. 26–A/2024, of February 20 in Portugal, defined for the tourism sector in the Algarve the goal of reducing by 15% the volume of water consumed by the urban sector, covering both domestic and non-domestic uses, compared to the previous year. In response to the requirements of the Portuguese Government for the sector, Pestana Hotel Group implemented the “Save Water” water efficiency label in its 12 units in the Algarve, a measure coordinated by the Algarve Tourism Region, in cooperation with Turismo de Portugal and ADENE – Agência para a Energia. This label was awarded to the units in Algarve after subscribing to the Water Efficiency Commitment. This commitment required outlining a 30–measure action plan that was implemented and monitored throughout the year, promoting efficiency in water use and ensuring compliance with the legal and environmental requirements that marked the year 2024. The Group achieved a combined reduction of 16.3% in these units. The measures implemented in the Algarve were applied across the Group.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management																												
E3-1_01	Disclosure on whether and how the policy addresses water management	In 2024, Pestana Hotel Group strengthened its sustainable water management strategy, in line with Resolution of the Council of Ministers No. 26–A/2024 in Portugal, which sets a target for the tourism sector in the Algarve to reduce by 15% the volume of water consumed by the urban sector compared with the previous year. To achieve this objective, Pestana Hotel Group implemented a set of structural and operational measures, which became transversal across the Group, namely: –Replacement of equipment with low-consumption solutions; –Monitoring and control of water consumption, broken down by operational areas (e.g., rooms, common areas, pool, gardens), enabling rapid detection of deviations or leaks; –Optimization of irrigation systems; –Awareness campaigns for employees and guests to encourage responsible behaviour.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management																												

ID	Topic	Information 2024	Location
E3-1_02	Disclosure on whether and how the policy addresses water use and water sourcing	The Group's policies and measures address water use, water sourcing and marine resources within its operations as follows: -Efficient water use: taps, showers, toilets and flushometers with an "A" label or with flow reducers; -Sourcing: water abstraction is carried out in accordance with local legislation, prioritising the public water supply and, when applicable, alternative sources that do not compromise ecosystems or the needs of local communities, such as rainwater, water from desalination plants in the Algarve, Porto Santo, São Tomé and Cape Verde, and in the future, wastewater from the Boavista WWTP which, after pre-treatment, may contribute to 50% of the irrigation needs of the Pestana Gramacho and Pestana Vale da Pinta golf courses; -Protection of marine resources: responsible management of wastewater; -Awareness and stakeholder engagement: the policy promotes awareness and engagement of employees and guests on the importance of water conservation and the protection of marine resources through communication and training activities.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-1_03	Disclosure on whether and how the policy addresses water treatment	The Group addresses water management in an integrated manner, including water treatment, monitoring and reuse as key measures to ensure a more sustainable supply throughout operations: -Preventive maintenance of equipment to avoid leaks and losses; -Disaggregated monitoring by areas and daily consumption records for rapid detection of deviations; -Adoption of equipment with water recirculation in washing processes (laundry, dishes, vehicles); -Use of automatic irrigation systems and monitoring with alarms for efficient irrigation.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-1_04	Disclosure on whether and how the policy addresses the prevention and reduction of water pollution	The Group's policies address the prevention and reduction of water pollution resulting from its activities as follows: -Avoiding the discharge of waste into toilets and drains; -Replacing detergents with "environmentally friendly" products and using them in appropriate doses; -Eliminating the use of running water to defrost food and implementing measures to reduce pre-washing in the kitchen; -Cleaning swimming pool filters with water reuse whenever possible. -Treatment of industrial effluent: At ECM, the effluent is treated at the ETAR before being discharged into the collector of the business park where the company is located, complying with the ELVs established in the Regulation of Madeira Parques Empresariais, S.A. and the respective licence.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-1_06	Commitment to reducing water consumption	See E3.MDR-P_01-06	-
E3-2	Actions and resources related to water and marine resources		
E3-2_03	Actions and resources related to water-risk areas	See E3.MDR-P_01-06	-

ID	Topic	Information 2024	Location
E3-4	Water consumption		
E3.MDR-A_01-12	Actions and resources related to water and marine resources	Pestana Hotel Group has strengthened its commitment to sustainable water management and the protection of marine resources through an integrated approach that involves the implementation of concrete measures and continuous investment in innovation and training. Actions implemented: -“Save Water” Programme: All Algarve units have adhered to the “Save Water” seal, with the definition of specific action plans and regular monitoring of results. -Reduction of water consumption: Installation of flow reducers, installation of automatic sensors and flow control systems, reduction of lawn areas and optimisation of irrigation times. -Reuse and recycling: Implementation of systems for the reuse of greywater and desalinated water lines, namely for garden irrigation and cleaning of common areas, contributing to the reduction of potable water consumption. -Wastewater treatment: Ensuring the routing of wastewater to treatment plants. -Capacity building: Carrying out training actions for employees focused on best practices in water management.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3.MDR-T_01-13	Monitoring the effectiveness of policies and actions through targets	The action plan outlined in Algarve in accordance with the Water Efficiency Commitment made it possible to achieve an aggregated reduction of 16.3% in this region. The 2030 action plan, for the reduction of GHG emissions, aims, compared to 2019, to reduce water consumption by 10% and increase water from alternative sources by 5%.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-4_01	Total water consumption		3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-4_01	Total water consumption	2 756 187 m ³	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-4_02	Total water consumption in water-stress areas	1 936 558 m ³	-
E3-4_03	Water reuse and recycling	Desalination plant: 701 86 m ³	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-4_06	Contextual information regarding water consumption	In 2024, the Group continued the process of systematically measuring water consumption. In the hospitality sector, data are recorded online and integrated into Power BI, allowing real-time monitoring. In the remaining businesses, consumption continues to be aggregated annually. To identify consumption in areas under water stress, the Group used the <i>World Resources Institute – Aqueduct Water Risk Atlas</i>, considering consumption in areas with water stress above 40%.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E3-4_07	Share of measured data obtained	100% of the data are obtained through direct measurement using meters installed in the units.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management

ID	Topic	Information 2024					Location	
E3-4_08	Water consumption intensity	Business	Consumption m³	No. of occupied rooms	€	L/€	m³/RN	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
		Hospitality (with Vacation Club)	1262 017	2 315 214	453 366 014	2,8	0,55	
		Beverages	185 227	–	39 138 859	4,7		
		Golf	1263 540	–	14 741 163	85,7		
		Total	2 710 784	2 315 214	507 246 036	5,3		
E3-4_09	Water consumption by sector	See E3-4_08					–	
E3-4_10	Additional water intensity ratio	See E3-4_08					–	
E5 – RESOUC E USE AND CIRCULAR ECONOMY								
E5-1	Policies related to resource use and circular economy							
E5.MDR -P_01-06	Description of policies related to the circular economy	Although there is no specific policy dedicated to the Circular Economy Strategy, the Group's Sustainability Procedures incorporates principles such as respect for ecosystems and local communities, a preference for the use of environmentally responsible or recycled materials, the reduction of waste generation, and the prioritization of partnerships with environmentally friendly entities. In 2024, the Group strengthened its commitment to reducing waste generation, recycling and reducing food waste. All units began recording their waste generation in spreadsheets that allowed the analysis throughout the year of its quantity and respective recycling rate. It implemented pilot projects such as composting accelerators, domestic composting and food waste measurement through Kitro technology. The Group maintained its commitment to reducing the use of disposable products, donating goods (mattresses, chairs, towels) and partnering with entities such as <i>Smart Waste Portugal</i>.					3.1 Environment: Caring for the planet that welcomes us > Resource use and management	
E5-1_01	Intention to adopt a transition plan, in case of inexistence	See E5.MDR-P_01-06					–	
E5-1_02	Intention to adopt a transition plan, in case of inexistence	See E5.MDR-P_01-06					–	
E5-5	Resource outflows (waste)							
E5-5_07	Total waste generated	9 242 t					3.1 Environment: Caring for the planet that welcomes us > Resource use and management	
E5-5_08	Waste diverted from disposal, breakdown by hazardous and non-hazardous waste	Type of recovery	Quantity (t)	Type of waste	Hazardousness		3.1 Environment: Caring for the planet that welcomes us > Resource use and management	
		Recovered	2 983	CDW	Non-hazardous			
		Recycled	1 366	Glass, Paper/Cardboard, Metal/Plastic, Used cooking oils, WEEE, others	Non-hazardous and hazardous (13 t)			
		Total	4 350					
E5-5_09	Waste sent for disposal, breakdown by hazardous and non-hazardous waste and treatment type	Type of disposal	Quantity (t)	Type of waste	Hazardousness		3.1 Environment: Caring for the planet that welcomes us > Resource use and management	
		Landfill	3 549	MSW	Non-hazardous			
		Landfill	843	Organic	Non-hazardous			
		Landfill	264	CDW	Non-hazardous			
		Landfill	237	Others	Non-hazardous			
		Total	4 892					

ID	Topic	Information 2024	Location
E5-5_10	Non-recycled waste	4 892 t	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E5-5_11	Percentage of non-recycled waste	53%	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E5-5_12	Disclosure of waste composition	In 2024, the Group generated a total of 9,242 tonnes of waste from its own operations. The composition of this waste reflects the diversity of the activities carried out. The largest volume of waste corresponds to mixed municipal solid waste (MSW), with approximately 3,549 tonnes, representing around 38% of the total. This waste is mainly composed of mixed materials. Construction and demolition waste (CDW) was the second largest identified stream, with 3,241 tonnes. Organic waste, mainly resulting from catering and hospitality operations, totalled 896 tonnes. Regarding recycling, the main streams were glass (553 t), paper/cardboard (335 t) and metal and plastic (195 t). Additionally, 86 tonnes of used cooking oils and fats were collected.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E5-5_13	Disclosure of relevant waste streams	Within the Group, the most relevant waste streams in terms of volume and environmental impact are organic waste and construction and demolition waste (CDW). Below is a detailed description of each stream, from its origin to its final's destination: Organic waste (896 tonnes) Activity of origin: This stream mainly results from catering activities, meal preparation and consumption in hotel food and beverage areas (restaurants, buffets, cafeterias), as well as food leftovers from accommodation units. It is generated daily and in large volumes, given the continuous nature of hotel operations. Final's Destination: Most organic waste is sent for disposal, presumably to landfill, despite its high potential for organic recovery (e.g. composting). In some units, such as Hotel Pestana Curitiba, partnerships were developed with specialised operators that ensure diversion to certified composting, as evidenced by the certificate issued by CompostaMais. There were also composting pilot projects, such as a composting accelerator at Pestana Palace Lisboa and domestic composting at Pousada da Ria in Aveiro. Construction and Demolition Waste (CDW) (3,241 tonnes) Activity of origin: This waste arises from construction, renovation, expansion and building maintenance works, activities that are frequent in the hospitality sector to ensure the renewal of the offer and adaptation to new requirements of comfort, accessibility and sustainability. Final's Destination: CDW is mostly sent to recovery operations, namely sorting and recovery of inert materials (such as concrete, ceramics or masonry) in facilities licensed for rubble recycling. This waste represents the largest individual volume recovered and is treated as a priority stream in the sustainable management of the Group's construction works.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E5-5_15	Total amount of hazardous waste	13 t	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
E5-5_16	Total amount of radioactive waste	0 t	-

ID	Topic	Information 2024	Location
E5-5_17	Description of the methodologies used	Portugal: In 2024, the Group began an internal process of measurement of organic waste using an estimation format, with the aim of raising awareness among teams about the importance of this waste, even in units where it is not yet treated individually. In this context, approximately 74% of the data were obtained through direct measurements, based on information from the Portuguese Environment Agency (APA) related to records with the issuance of e-GAR (electronic waste tracking guide). The remaining 26% correspond to estimates, mainly from units such as Pousadas and organic waste from various units. Other countries (South America and Europe): approximately 69% of the data come from direct measurements at operational units, through on-site weighing or records from collection operators. The remaining 31% correspond to estimates, mainly associated with recyclable waste in South America (e.g. paper/cardboard, glass, plastic). Africa: due to operational limitations, waste generation has not yet been estimated. Estimation criteria: in cases where estimates were required, a methodology based on manual weighing (kg) or volumetric estimation based on container size was adopted, collecting representative data for each month of the year.	3.1 Environment: Caring for the planet that welcomes us > Resource use and management
S1 – OWN WORKFORCE			
S1-1	Policies related to own workforce		
S1.MDR-P_01-06	General policy for the management of IROs regarding the own workforce	The management of impacts, risks and opportunities related to the Group's own workforce is ensured through the Code of Conduct and Ethics, which covers all employees of Pestana Hotel Group as defined in S1.SBM-3_01. The policies ensure: -Prohibition of discrimination, moral harassment, sexual harassment and retaliation: Employees must be treated and treat others with dignity, respect and courtesy, and situations of discrimination, moral or sexual harassment, or retaliation in the workplace are not tolerated. In addition to other illegal acts, improper conduct and discriminatory or censoring comments are prohibited, namely those based on age, sex and sexual orientation, place of origin, pregnancy status, nationality, ancestry, marital status, disability, religion or others of a similar nature. -Environment, health and safety in the workplace: Pestana Hotel Group is committed to providing a healthy and safe working environment and, in addition to applicable law, has established good practices and procedures on this matter that employees must comply with. -Prevention of violence in the workplace: Violence in the workplace is not tolerated; the workplace must be safe and free, and any acts or threats of violence (verbal or physical) by an employee against another person are expressly prohibited.	3.2. People: Valuing those who shape our story
S1-1_03	Alignment of the Policy commitments with workers' rights	See S1.MDR-P_01-06	-
S1-1_08	Specific policies on labour irregularities	The Group does not have policies that explicitly address human trafficking, forced labour or child labour.	-
S1-1_09	Occupational health and safety management system	The Group does not have a formal policy or management system for the prevention of occupational accidents / operational health and safety.	-
S1-1_10	Policies to combat discrimination and promote inclusion and diversity	In the Code of Conduct and Ethics, which covers all employees of Pestana Hotel Group, there is a provision regarding the prohibition of discrimination: -Prohibition of discrimination, moral harassment, sexual harassment and retaliation: Employees must be treated and treat others with dignity, respect and courtesy, and situations of discrimination, moral or sexual harassment, or retaliation in the workplace are not tolerated. In addition to other illegal acts, improper conduct and discriminatory or censoring comments are prohibited, namely those based on age, sex and sexual orientation, place of origin, pregnancy status, nationality, ancestry, marital status, disability, religion or others of a similar nature.	3.2. People: Valuing those who shape our story > Talent, development and diversity 3.3. Governance: leading responsibly and innovatively > Business conduct

ID	Topic	Information 2024	Location
S1-1_11	Grounds of discrimination covered by the policies	See S1-1_10	3.2. People: Valuing those who shape our story > Talent, development and diversity
S1-1_13	Implementation and monitoring of non-discrimination policies	See S1-1_10	3.2. People: Valuing those who shape our story > Talent, development and diversity
S1-2	Processes for engaging with own workforce and workers' representatives about impacts		
S1-2_01	Contribution of the workforce to decision-making and engagement mechanisms	The annual moment for employee auscultation is the Organizational survey, allowing the assessment of employee satisfaction across eight key areas: 1) Leadership, 2) Culture, 3) Internal communication, 4) Integration and collaboration, 5) Sustainability, diversity and inclusion, 6) Working conditions and wellbeing, 7) Learning and development and 8) Compensation, benefits, attraction and retention. The feedback obtained is crucial for aligning and prioritising actions that improve the employee experience.	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety
S1-2_06	Effectiveness of dialogue	The Group discloses the results of the annual Organizational study across the organization and in detail to the various business areas, units, and representative departments.	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns		
S1-3_02	Specific channels for the workforce to raise concerns	Within the Group, there are several ways and mechanisms to identify concerns regarding unlawful behaviour or conduct that is not in compliance with its Code of Conduct or similar internal rules. First, any employee, as well as any manager, may report to the hierarchy or directly to the Human Resources department any procedures or practices that are incorrect or non-compliant with the Code of Conduct and Ethics (CCE). The CCE defines a set of conflict-of-interest situations that employees are required to observe, and the applicable legislation on Compliance also applies, particularly in cases involving politically exposed persons. There are video surveillance systems, with images routinely stored for one month, through which the Security department may verify certain improper procedures. Finally, there is a whistleblowing channel that guarantees anonymity and full protection for whistleblowers acting in good faith. A Policy for the Protection of Whistleblowers Acting in Good Faith is in force, ensuring anonymity. This Policy not only exists and is published but has also been applied since 2022. For this purpose, a whistleblowing channel was created, the recipient of which is an entity external to the organization, Cuatrecasas (acting as Compliance Officer). The Compliance Officer forwards the report to Pestana Hotel Group while anonymizing the identity of the reporter. Subsequently, the Group's structure carries out the investigations, inquiries, or procedures it deems appropriate and decides on the matter. The decision taken is then communicated to the Compliance Officer, who subsequently transmits it to the person (whether an employee or not) who submitted the report.	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety 3.3. Governance: leading responsibly and innovatively > Business conduct
S1-3_05	Mechanism for handling labour complaints and grievances	See S1-3_02	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety 3.3. Governance: leading responsibly and innovatively > Business conduct

ID	Topic	Information 2024	Location
S1-3_07	Registration and follow-up of issues raised through the available channels	See S1-3_02	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety 3.3. Governance: leading responsibly and innovatively > Business conduct
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions		
S1.MDR-A_01-12	Action plan and resources to manage IROs related to the Group's own workforce	The Group's Talent and Development strategy was developed for the 2022-2024 three-year period. The main strategic pillars defined were: -Consolidate the Pestana Academy: Improving the quality and range of training programmes, including e-learning content; digitalising training administrative processes; consolidating the Group's development programmes - Growing Together, Cross Training, Trainee Programme and Mobility; and promoting initiatives such as Pestana Sharing (internal knowledge-sharing sessions, communication of new projects and/or best practices) and Pestana Invites (sessions with inspiring external speakers who share meaningful and motivating life experiences, conveying a strong message to the organisation). -Disseminate the Pestana Culture: Integrating Pestana culture and values into various implemented initiatives; developing interactive workshops with employees to promote the culture in day-to-day activities; creating a cultural booklet and various communication tools for the Pestana Culture (posters, handbook, welcome kits, newsletters). -Continue to invest in talent management: Implementing initiatives and developing partnerships (employees institutes, national and international schools, etc.) to increase proximity to talent; improving the onboarding process for seasonal employees and interns; consolidating mobility programmes, creating more opportunities for employees within PHG; and consolidating the Group's compensation and benefits model. -Improve the employee experience: Consolidating the employee onboarding process and assigning the staff card; creating specific integration programmes (Pestana World, Pestana Welcome); celebrating key employee moments (key dates and employee of the month/year); improving common areas and offices (Lisbon, Algarve) as well as accommodation (Madeira, Algarve and Porto Santo); and strengthening partnerships/discounts with external entities.	3.2. People: Valuing those who shape our story > Talent, development, and diversity

ID	Topic	Information 2024	Location
SI-4_01	Actions to prevent or mitigate significant negative impacts on the Group's own workforce	The Group maintains its commitment to valuing and ensuring the wellbeing of its workforce. The Group's strategy defines initiatives that mitigate negative impacts related to its own workforce while simultaneously generating positive impacts in areas such as retention, skills development, wellbeing, working conditions, and organisational culture. It is important to highlight that this commitment is transversal across the Group, covering all geographies and business areas. The Group monitors annually the engagement of employees through a survey that measures satisfaction across key areas: (1) Leadership, (2) Culture, (3) Internal communication, (4) Integration and collaboration, (5) Sustainability, diversity and inclusion, (6) Working conditions and wellbeing, (7) Learning and development, and (8) Compensation, benefits, attraction and retention. The feedback obtained is crucial to align and prioritise actions aimed at improving the employee experience. In 2024, the employee satisfaction level reached 79.4%, the highest value since 2017. Pestana Hotel Group continues to work on the annual review of minimum remuneration and on the recognition of employees based on their performance, in order to ensure greater internal equity. The Group is also committed to strengthening the benefits offered, with a direct impact on employees' quality of life. These include wellbeing support such as health insurance and psychological support, as well as benefits that provide experiential value to employees, such as an annual stay voucher at a Pestana unit and discounts on accommodation and food and beverage services across the Group's units. The Group continues to improve the employee card and to establish partnerships that provide additional benefits for employees. The Group continues to invest in the development of internal talent through the Pestana Academy, which managed more than 36,000 training hours for over 3,300 employees. The Group offers Cross-Training programmes, which may vary in duration and where the sharing of experiences fosters the continuous development of employees. The Pestana Mobility Programme was created to promote exchange between different geographies and functions, while also addressing temporary and specific needs within the Group. Cross-training may also take place in shorter formats, for example one-week programmes, where employees from shared services can experience more operational roles. In 2024, the first edition of Pestana Foodies was also organised, bringing together Kitchen and F&B managers from different regions, with the aim of motivating, raising awareness and inspiring teams towards continuous improvement of customer service and best practices. In 2024, the Group maintained its Growing Together programme, which aims to prepare high-potential talent for a career in hospitality, focusing on leadership skills development and deepening knowledge of hotel operations. The Group continued to invest in internal communication through the relaunch of the quarterly magazine <i>One Pestana</i> and the bi-weekly newsletter <i>Pestana Connect</i>, aimed at promoting internal initiatives and sharing key highlights. Regular initiatives such as <i>CEO Talks</i> and <i>President Live</i> were also maintained, ensuring the dissemination of the strategy and institutional feedback. The Group invested in improving working conditions by refurbishing shared services offices in Lisbon and the Algarve and by improving the management of staff accommodation in operations in the Algarve, Madeira and Porto Santo.	3.2. People: Valuing those who shape our story > Talent, development, and diversity
SI-4_02	Measures to provide solutions with real material impact	Pestana Hotel Group ensures, through its Code of Conduct and Ethics, the processes for managing positive and negative impacts, safeguarding the protection and wellbeing of employees in the workplace. Any situation that does not comply with the Code of Conduct and Ethics is managed by the responsible area and referred to the Legal Department, which conducts the analysis, investigation and initiates any disciplinary proceedings deemed necessary. The Group is also committed to supporting work-life balance. In 2024, it took the first steps in the certification process for <i>efr - Family Responsible Companies</i>. This important step aims to confirm the Group's commitment to implementing measures that promote a better balance between employees' personal, family and professional lives, based on flexibility, respect and mutual commitment.	3.2. People: Valuing those who shape our story > Talent, development, and diversity / Health, wellbeing, and safety
SI-4_03	Additional actions to promote positive impacts on the Group's own workforce	See SI-4_01	3.2. People: Valuing those who shape our story > Talent, development, and diversity

ID	Topic	Information 2024				Location																														
SI-4_04	Assessment of the effectiveness of the actions and initiatives adopted	The Organizational study enables an annual assessment of employee satisfaction across multiple dimensions. It supports the definition of actions designed to create a positive impact on teams, while also allowing the organization to evaluate employees' perceptions of these initiatives. The satisfaction analysis is conducted by each business area in collaboration with Human Resources, ensuring that responses are tailored to the specific priorities and challenges of each location.				3.2. People: Valuing those who shape our story > Health, wellbeing, and safety																														
SI-4_05	Processes to identify necessary measures to respond to negative impacts	See SI-4_04				3.2. People: Valuing those who shape our story > Health, wellbeing, and safety																														
SI-6	Characteristics of the undertaking's employees																																			
SI-6_01	Total number of workers by headcount and gender	<table><tr><td>Number of employees</td><td colspan="2">Average number of employees</td></tr><tr><td>All employees (excluding trainees)</td><td colspan="2">4 328</td></tr><tr><td>Male</td><td colspan="2">2 536</td></tr><tr><td>Female</td><td colspan="2">1 792</td></tr><tr><td>All employees</td><td colspan="2">4 476</td></tr><tr><td>Male</td><td colspan="2">2 597</td></tr><tr><td>Female</td><td colspan="2">1 879</td></tr></table>				Number of employees	Average number of employees		All employees (excluding trainees)	4 328		Male	2 536		Female	1 792		All employees	4 476		Male	2 597		Female	1 879		3.2. People: Valuing those who shape our story									
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SI-6_02	Total number of workers by headcount, at the end of the reporting period	<table><tr><td>Number of employees</td><td colspan="2">Number of employees at 31/12/2024</td></tr><tr><td>All employees (excluding trainees)</td><td colspan="2">4 244</td></tr><tr><td>Male</td><td colspan="2">2 493</td></tr><tr><td>Female</td><td colspan="2">1 751</td></tr><tr><td>All employees</td><td colspan="2">4 288</td></tr><tr><td>Male</td><td colspan="2">2 507</td></tr><tr><td>Female</td><td colspan="2">1 781</td></tr></table>				Number of employees	Number of employees at 31/12/2024		All employees (excluding trainees)	4 244		Male	2 493		Female	1 751		All employees	4 288		Male	2 507		Female	1 781		3.2. People: Valuing those who shape our story									
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SI-6_03	Average number of employees (head count)	Ver SI-6_01				3.2. People: Valuing those who shape our story																														
SI-6_04	Total number of workers by headcount and by country (countries where the company has 50 or more employees)	<table><tr><td></td><td colspan="2">Average number of employees</td><td colspan="2">Number of employees as at 31/12/2024</td></tr><tr><td></td><td>#</td><td>%</td><td>#</td><td>%</td></tr><tr><td>Total employees excluding trainees</td><td>4 328</td><td>100%</td><td>4 244</td><td>100%</td></tr><tr><td>Portugal</td><td>3 352</td><td>77%</td><td>3 263</td><td>77%</td></tr><tr><td>Total employees</td><td>4 476</td><td>100%</td><td>4 288</td><td>100%</td></tr><tr><td>Portugal</td><td>3 517</td><td>79%</td><td>3 298</td><td>77%</td></tr></table>					Average number of employees		Number of employees as at 31/12/2024			#	%	#	%	Total employees excluding trainees	4 328	100%	4 244	100%	Portugal	3 352	77%	3 263	77%	Total employees	4 476	100%	4 288	100%	Portugal	3 517	79%	3 298	77%	3.2. People: Valuing those who shape our story
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SI-6_05	Total number of workers by headcount and by country	See SI-6_04				3.2. People: Valuing those who shape our story																														
SI-6_06	Total number of workers by headcount and by country	See SI-6_04				3.2. People: Valuing those who shape our story																														
SI-6_07	Number of workers by type of contract and gender	<table><tr><td></td><td colspan="2">Average number of employees</td></tr><tr><td></td><td>Male</td><td>Female</td></tr><tr><td>Total</td><td>2 597</td><td>1 879</td></tr><tr><td>Permanent</td><td>2 064</td><td>1 487</td></tr><tr><td>Fixed-term contract</td><td>472</td><td>305</td></tr><tr><td>Trainees</td><td>61</td><td>87</td></tr></table>					Average number of employees			Male	Female	Total	2 597	1 879	Permanent	2 064	1 487	Fixed-term contract	472	305	Trainees	61	87	3.2. People: Valuing those who shape our story												
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Fixed-term contract	472	305																																		
Trainees	61	87																																		

ID	Topic	Information 2024			Location
SI-6_08	Number of workers by region		Male	Female	3.2. People: Valuing those who shape our story
		Total	2 597	1 879	
		Portugal	2 048	1 469	
		Africa	246	144	
		South America	173	140	
		Europe (excl. Portugal)	117	112	
		North America	13	14	
SI-6_11	Number of workers who left during the reporting period		PIH		3.2. People: Valuing those who shape our story > Talent, development, and diversity
		Employees who left the company	1978		
		Permanent employees and employees with non-seasonal contracts who left the company	957		
		Note: Seasonal employees are employees whose employment contract is intended to meet peak-season needs, starting and ending within the same year.			
SI-6_12	Employee turnover rate		PIH		3.2. People: Valuing those who shape our story > Talent, development, and diversity
		Turnover rate – permanent employees and employees with non-seasonal contract	24%		
		Note: Seasonal employees are employees whose employment contract is intended to meet peak-season needs, starting and ending within the same year.			
SI-6_13	Description of methodologies and assumptions	The data were compiled based on the following methodologies and assumptions: 1) A distinction was made between trainees and non-trainees, allowing for a detailed analysis by type of contractual relationship. 2) The average headcount was calculated based on the number of employees recorded on the last day of each month throughout the reporting period. 3) Data were extracted from the human resources management platform – My Pestana (SAP SuccessFactors), ensuring consistency and traceability of the information. 4) The total number of employees considers the consolidated companies of PIH.			
SI-6_14	Indication of headcount or full-time equivalents (FTE)	The number of employees is reported in headcount.			–
SI-6_15	Numbers reported at the end of the period or as an average	The number of employees is reported as average headcount. This approach reflects variations in the number of employees throughout the year, due to the seasonality inherent to the business.			–
SI-6_16	Additional contextual information on variations in the numbers	The average number of employees of Pestana Hotel Group increased compared to 2023, reflecting the increase in the Group's activity.			–
SI-9	Diversity metrics				
SI-9_01	Gender distribution in senior management (number)		Average number of senior management employees	Percentage distribution of senior management employees	3.2. People: Valuing those who shape our story > Talent, development, and diversity
		Female	100	36%	
		Male	177	64%	
		Total	277	100%	

ID	Topic	Information 2024			Location
S1-9_02	Gender distribution in senior management (percentage)	See S1-9_02			3.2. People: Valuing those who shape our story > Talent, development, and diversity
S1-9_03	Distribution by age Group: <30 years (number and percentage)		Number	Percentage	3.2. People: Valuing those who shape our story > Talent, development, and diversity
		<30	1 021	24%	
		[30–50]	2 218	51%	
		>50	1 089	25%	
		Total	4 328	100%	
S1-9_04	Distribution by age Group: 30–50 years (number and percentage)	See S1-9_03			3.2. People: Valuing those who shape our story > Talent, development, and diversity
S1-9_05	Distribution by age Group: >50 years (number and percentage)	See S1-9_03			3.2. People: Valuing those who shape our story > Talent, development, and diversity
S1-9_06	Definition of “senior management level”	“Senior management” refers to employees belonging to the following internal functional groups: Board, Senior Management (levels 13–15), and Management (levels 10–12).			3.2. People: Valuing those who shape our story > Talent, development, and diversity
S1-10	Adequate wages				
S1-10_01	Adequacy of workers’ income	At Pestana Hotel Group, all employees are subject to appropriate remuneration and benefits policies.			3.2. People: Valuing those who shape our story > Talent, development, and diversity
S1-10_01	Countries of operation in which workers do not earn an adequate income	Not applicable, since all workers in all countries earn an adequate income.			–
S1-12	Persons with disabilities				
S1-12_01	Percentage of employees with disabilities		% Employees		3.2. People: Valuing those who shape our story > Talent, development, and diversity
		Male	1,1%		
		Female	1,0%		
		Total	1,1%		

ID	Topic	Information 2024	Location								
S1-12_03	Contextual information on employees with disabilities	Pestana Hotel Group adapts its methodology in accordance with the legislation in force in each country where it operates, to comply with local regulations. Data on employees with disabilities are recorded in the human resources management platforms. In Portugal, the process for recognising disability status is carried out through the submission of a <i>Multi-purpose Medical Disability Certificate (Atestado Médico de Incapacidade Multiusos)</i>. This document certifies the degree of physical or mental disability, expressed as a percentage, as well as whether it is temporary or permanent. In Portugal, the degree of disability must be equal to or greater than 60% for the employee to be considered for calculation purposes. In Spain, the degree of disability must be equal to or greater than 33%, recognised by the INSS (<i>Instituto Nacional de la Seguridad Social</i>) or equivalent bodies such as IMSERSO (<i>Instituto de Mayores y Servicios Sociales</i>). In Germany, the degree of disability must be equal to or greater than 50%, issued by the Social Welfare Department of each federal state. In the remaining countries where Pestana Hotel Group operates, there is no defined disability percentage; however, quotas may be required, such as in Brazil, where 3% of the total workforce must be allocated to persons with disabilities. Accordingly, a person with a disability is considered to be an employee who presents medical documentation attesting to the impact of their physical or psychological condition on daily activities, in accordance with local legislation and recognised by the competent authority (United Kingdom, Netherlands, Brazil, Argentina, United States, Morocco, Mozambique, Cape Verde, São Tomé and Príncipe, South Africa). To calculate the percentage of employees with disabilities, the number of persons with disabilities is divided by the total number of employees (permanent and fixed-term).	-								
S1-13	Training and skills development metrics										
S1-13_02	Percentage of employees with regular performance reviews	<table><tr><th colspan="2">% Employees</th></tr><tr><td>Male</td><td>98%</td></tr><tr><td>Female</td><td>99%</td></tr><tr><td>Total</td><td>99%</td></tr></table>	% Employees		Male	98%	Female	99%	Total	99%	3.2. People: Valuing those who shape our story > Talent, development, and diversity
% Employees											
Male	98%										
Female	99%										
Total	99%										
S1-13_04	Average number of training hours	<table><tr><th colspan="2">Average training hours by gender</th></tr><tr><td>Male</td><td>10,1</td></tr><tr><td>Female</td><td>12,1</td></tr><tr><td>Total</td><td>11,0</td></tr></table>	Average training hours by gender		Male	10,1	Female	12,1	Total	11,0	3.2. People: Valuing those who shape our story > Talent, development, and diversity
Average training hours by gender											
Male	10,1										
Female	12,1										
Total	11,0										
S1-14	Health and safety metrics										
S1-14_01	Percentage of employees covered by the occupational health and safety management system	87% (all employees except trainees) –Employees with permanent contracts are covered by insurance from the first day of employment. –Fixed-term employees are covered by insurance after six months of contract. Employees also have the option to include their family members, with the cost borne by the employees themselves, at very advantageous rates compared to the market.	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety								
S1-14_02	Number of work-related fatalities due to injury or illness	0	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety								

ID	Topic	Information 2024	Location						
S1-14_03	Number of fatalities due to work-related injuries or health issues – other workers	0	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety						
S1-14_04	Number of recordable work-related injuries	278	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety						
S1-14_05	Rate of recordable work-related injuries	35%	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety						
S1-14_07	Number of workdays lost due to work-related injuries or fatalities	7337	3.2. People: Valuing those who shape our story > Health, wellbeing, and safety						
S1-17	Incidents, complaints and severe human rights impacts								
S1-17_02	Total number of reported discrimination incidents	<table><tr><td colspan="2">PIH</td></tr><tr><td>Total number of discrimination incidents, including harassment</td><td>4</td></tr><tr><td>Number of complaints submitted through channels that allow the company's own workforce to raise concerns (including grievance mechanisms)</td><td>3</td></tr></table>	PIH		Total number of discrimination incidents, including harassment	4	Number of complaints submitted through channels that allow the company's own workforce to raise concerns (including grievance mechanisms)	3	3.2. People: Valuing those who shape our story > Talent, development, and diversity 3.3. Governance: leading responsibly and innovatively > Business conduct
PIH									
Total number of discrimination incidents, including harassment	4								
Number of complaints submitted through channels that allow the company's own workforce to raise concerns (including grievance mechanisms)	3								
S1-17_03	Number of complaints submitted through internal whistleblowing channels	See S1-17_02	3.3. Governance: leading responsibly and innovatively > Business conduct						
S1-17_04	Number of complaints submitted through national channels or OECD National Contact Points	We are not aware of any complaints submitted to the OECD National Contact Points for Multinational Enterprises.	–						
S1-17_05	Total amount of fines, sanctions and compensation related to the disclosed incidents	The complaints submitted were not subject to fines.	3.3. Governance: leading responsibly and innovatively > Business conduct						
S1-17_07	Contextual information	The information is managed by the responsible area and referred to the Legal Department, which carries out the analysis, investigation and initiation of any disciplinary proceedings deemed necessary.	–						
S1-17_08	Number of severe human rights incidents	There were no incidents related to human rights (e.g. forced labour, human trafficking or child labour) within the Group's own workforce. There were no fines, sanctions or compensation resulting from human rights-related incidents.	3.3. Governance: leading responsibly and innovatively > Business conduct						
S1-17_09	Number of severe human rights incidents related to the workforce	See S1-17-08	3.3. Governance: leading responsibly and innovatively > Business conduct						
S1-17_10	Indication where no such incidents have occurred	See S1-17-08	3.3. Governance: leading responsibly and innovatively > Business conduct						

ID	Topic	Information 2024	Location
S1-17_11	Disclosure of the total amount of fines, sanctions and compensation	See S1-17-08	3.3. Governance: leading responsibly and innovatively > Business conduct
S1-17_12	Disclosure of information on the reconciliation of monetary amounts	See S1-17-08	3.3. Governance: leading responsibly and innovatively > Business conduct
S3 – AFFECTED COMMUNITIES			
S3-1	Policies related to affected communities		
S3.MDR-P_01-06	Policies dedicated to the management of IROs related to affected communities	The management of impacts, risks and opportunities related to communities is framed within Pestana Hotel Group's Sustainability Policy, operationalised through the PLANET GUEST programme. This programme is positioned as an overarching concept that reflects Pestana Hotel Group's stance as an organisation that respects and values the environment, society and corporate ethics, under the signature "We are only guests of the Planet." Within its scope of action, the programme encompasses two main dimensions: -Social dimension: activities providing direct support to local communities, promotion of education and culture, internal social responsibility, entrepreneurship projects, and initiatives aimed at the recovery and preservation of classified heritage. -Environmental dimension: guiding principles including respect for ecosystems and local communities, preferential use of efficient equipment and sustainable materials, use of renewable energy, reduction of CO₂ emissions, responsible water resource management, waste minimisation, and encouragement of the preservation of green areas. Accordingly, PLANET GUEST constitutes the overarching policy through which Pestana Hotel Group manages its IROs related to communities, ensuring that its presence in tourist destinations contributes to sustainable development, social inclusion and environmental preservation.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-1_03	General approach to the human rights of Indigenous Peoples	Pestana Hotel Group recognises and respects the human rights of Indigenous Peoples, in accordance with the United Nations Guiding Principles on Business and Human Rights. Although the Group's operations are mainly concentrated in urban and tourist contexts where there is no significant presence of Indigenous Peoples, the Sustainability Procedures – implemented through the PLANET GUEST programme – establishes general principles of respect for local communities and cultural diversity. This approach is based on three pillars: -Do no harm principle: a commitment to preventing any form of adverse impact on Indigenous communities, whether direct or indirect, across the value chain. -Cultural respect: recognition and appreciation of identities, traditions and cultural heritage in all tourist destinations where the Group operates. -Due process and dialogue: in the event of operations in regions with Indigenous Peoples, the Group is committed to ensuring prior consultation, aligned with international best practices. In this way, Pestana Hotel Group's approach integrates the human rights of Indigenous Peoples within the broader framework of social and cultural impact management, reinforcing its commitment to sustainable development and corporate ethics.	3.2. People: Valuing those who shape our story > Involvement and development of local communities

ID	Topic	Information 2024	Location
S3-1_04	General approach to engagement with affected communities	Pestana Hotel Group adopts a structured approach to engagement with communities within the scope of the PLANET GUEST programme, which defines principles of mutual respect, shared value creation and transparent dialogue with stakeholders. This engagement is based on three main dimensions: 1. Continuous and transparent dialogue: -Maintaining communication channels with local communities, NGOs and other organisations; -Identifying expectations, needs and potential risks through consultations and participatory processes. 2. Social integration and development: -Supporting initiatives related to education, culture, social inclusion and volunteering; -Promoting local employment, valuing regional suppliers and encouraging entrepreneurship; -Recovering and preserving classified heritage and cultural traditions in tourist destinations. 3. Impact mitigation and opportunity creation: -Managing the socio-environmental impacts resulting from tourism activity, particularly in sensitive areas; -Implementing responsible environmental practices to reduce pressure on natural resources, ensuring long-term benefits for communities. Through this approach, Pestana Hotel Group seeks to ensure that its presence contributes positively to the sustainable development of destinations, strengthening the trust of local communities and ensuring social acceptance.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-1_06	Alignment with international instruments	Pestana Hotel Group's policies relating to communities, framed within the PLANET GUEST programme, are aligned with internationally recognised standards, including the United Nations Sustainable Development Goals (SDGs) and the Universal Declaration of Human Rights. This alignment translates into a commitment to respecting local communities and Indigenous Peoples, promoting social inclusion, education and culture, and preserving heritage, as well as implementing environmental practices that reduce pressure on ecosystems and natural resources. In contexts where Indigenous Peoples are present, the Group ensures respect for the principle of free, prior and informed consent, reinforcing its social licence to operate and contributing to the sustainable development of tourist destinations.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-2	S3-2 – Processes for engaging with affected communities about impacts		
S3-2_02	Dialogue with communities or legitimate representatives	During the reference year, Pestana Hotel Group ensured direct and ongoing engagement with local communities, community associations, non-governmental organisations and cultural entities, in order to understand their expectations and incorporate their perspectives into the management of actual and potential impacts. The engagement process includes: -Direct engagement and contact with communities residing in the destinations where the Group operates, through meetings with NGOs and other associations; -Social and cultural cooperation projects developed under the PLANET GUEST programme, which integrate community input into the definition of support priorities (education, inclusion, culture and entrepreneurship); -Consultations and institutional partnerships for the preservation of classified heritage, valuing the participation of community representative entities. The perspectives gathered influence operational and strategic decisions, namely: -Selection of corporate social responsibility projects; -Prioritisation of investments in community and cultural initiatives; -Definition of environmental mitigation measures with a direct impact on local ecosystems.	3.2. People: Valuing those who shape our story > Involvement and development of local communities

ID	Topic	Information 2024	Location
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns		
S3-3_11	Channels available for communities to express concerns or needs	Pestana Hotel Group has specific channels in place that allow communities to express concerns or needs directly to the company, ensuring a structured and transparent response. Internal channels established by the company include: -Integration of community suggestions and concerns through initiatives under the PLANET GUEST program; -The possibility of contacting the Group's sustainability and social responsibility coordination team for the referral of requests and partnerships; -Participation in third-party mechanisms, such as partnerships with NGOs and other social solidarity institutions, which act as channels for receiving concerns from vulnerable groups. These mechanisms allow community perspectives to be incorporated into decision-making and ensure the effective management of actual and potential impacts in the destinations where Pestana Hotel Group operates.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-3_13	Monitoring and effectiveness of channels used by affected communities	Pestana Hotel Group does not limit itself to making channels available but actively monitors their use. It ensures the effectiveness of these mechanisms by assessing whether they genuinely respond to the needs of communities. This process is carried out through active listening, issue resolution and the strengthening of trust-based relationships with communities.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-3_15	Policies protecting against retaliation for those using grievance channels	Pestana Hotel Group ensures that all individuals who use communication channels to raise concerns or needs are protected against any form of retaliation. This commitment goes beyond the Sustainability Policy and is also implemented through the Group's Code of Ethics and Conduct.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-3_19	Accessibility of third-party mechanisms	In addition to internal channels, communities may resort to third-party mechanisms, including those managed by partner NGOs, associations and similar entities. These mechanisms are accessible both to directly affected communities and to individuals or organisations acting on their behalf or who may be aware of potential negative impacts.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions		
S3-4_03	Initiatives and processes to promote positive impacts on communities	The PLANET GUEST strategy in local communities is based on creating shared value through: -Partnerships with NGOs, social solidarity institutions or cultural associations, enhancing positive social and environmental impact; -Improvement of community infrastructures and support for projects in education, social inclusion, culture, volunteering, and the preservation of classified heritage; -Regional economic stimulation, promoting local employment, valuing regional suppliers and producers, and encouraging entrepreneurship; -Protection of the regions where it operates through environmental mitigation practices, efficient resource use, and the preservation of ecosystems and green spaces. This strategy strengthens Pestana Hotel Group's connection to the communities where it operates, ensuring that its presence contributes to the sustainable development of the regions where it is present.	3.2. People: Valuing those who shape our story > Involvement and development of local communities

ID	Topic	Information 2024	Location
S3-4_04	Mechanisms to monitor the effectiveness of mitigation actions	Pestana Hotel Group monitors the impact of its actions under the PLANET GUEST programme through: -Quantitative indicators: number of direct beneficiaries, volunteer hours, investment in social and cultural projects, percentage of local suppliers involved, reduction in energy/water consumption and CO2 emissions; -Qualitative indicators: community perception of projects, evaluation of institutional partners, and feedback from NGOs and other associations; -Project monitoring: visits, follow-up meetings with communities and partners, and verification of the continuity of benefits after implementation; -Alignment with international standards (GRI and ESRS): ensuring comparability and transparency in the communication of results. This monitoring system allows for the evaluation of the effectiveness of initiatives, identification of improvement opportunities, and ensures that positive impacts on communities and the environment are effective and sustainable.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-4_05	Identification of measures in response to negative impacts	The Group, identifies and responds to actual or potential negative impacts through a structured process that includes risk identification, materiality assessment (severity, scale, etc.), the definition of preventive, mitigating, or remediation measures in collaboration with community representatives, and monitoring the effectiveness of these actions, always striving for continuous improvement and transparency in disclosing results.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S3-4_11	Communication of serious human rights issues	We are not aware of any serious human rights issues or incidents related to affected communities that have been disclosed.	3.2. People: Valuing those who shape our story > Involvement and development of local communities
S4 – CONSUMERS AND END-USERS			
S4-1	Policies related to consumers and end-users		
S4.MDR-P_01-06	Company policies to manage material impacts, risks and opportunities related to consumers and end users	All consumers are covered by the following policies and mechanisms: Personal Data Protection Policy: https://www.pestana.com/pt/politica-privacidade Customer Ombudsman: https://www.pestanagroup.com/pt-pt/pestana-group/ombudsman/ Code of Conduct and Ethics for Employees: sets clear guidelines for responsible and ethical behavior in interactions with customers	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-1_01	Scope of the policies: all consumers/users or specific groups	See S4-1_01	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-1_02	Human Rights Commitments	Under the PLANET GUEST programme and within the scope of its social responsibility policy, Pestana Hotel Group created a Customer Ombudsman for its hotel establishments worldwide, with the aim of improving customer satisfaction levels. The Pestana Customer Ombudsman's main objective is to promote and safeguard the rights, guarantees and legitimate interests of its customers about the services provided by its hotel establishments. The Pestana Customer Ombudsman is committed to carefully analysing customer needs and concerns, seeking fair and appropriate solutions for each customer, and responding to all cases with the utmost speed and effectiveness, thereby increasing customer trust in Pestana Hotel Group.	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-1_03	General approach to respecting consumers' human right	See S4-1_02	3.2. People: Valuing those who shape our story > Customer experience and wellbeing

ID	Topic	Information 2024	Location
S4-2	Processes for engaging with consumers and end-users about impacts		
S4-2_01	How the perspectives of consumers/end-users inform company decisions or activities	Pestana Hotel Group consistently values and integrates the perspectives of its consumers and end-users into its decision-making processes and into the management of actual and potential impacts arising from its activities. To this end, the Group implements several information-gathering mechanisms, namely customer satisfaction surveys conducted after each stay and the continuous monitoring of ratings and comments shared on digital platforms. The information obtained through these channels is periodically analysed by the responsible teams and serves as a basis for strategic and operational decision-making aimed at the continuous improvement of the services provided. Additionally, the Group provides customer support channels through its digital platforms, ensuring that any queries are addressed in a timely, effective and personalised manner, tailored to customers' needs. Under the PLANET GUEST programme and within the scope of its social responsibility policy, Pestana Hotel Group established a Customer Ombudsman for its hotel establishments worldwide.	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-2_02	Existence of dialogue with consumers/end-users or their representatives	Customer support channels are available on a daily basis, ensuring a timely and effective response to any support needs that may arise. Customer satisfaction surveys are regularly monitored by the hotel units and the respective departments. In addition, key customer satisfaction indicators are presented monthly to the Executive Committee, enabling a comprehensive and informed assessment of performance and service quality.	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	-	-
S4-3_01	Approach to remediating negative impacts	The Group provides multiple customer support contact channels, including the Customer Ombudsman, to promptly address customer concerns and ensure that any issue is forwarded to the appropriate specialised teams, as previously described. Customer satisfaction surveys are also conducted after each stay, and ratings and comments shared on digital platforms are continuously monitored. Whenever a significant negative impact on consumers and end-users is identified, internal processes are triggered to ensure a detailed analysis of the situation, identification of root causes, and implementation of corrective measures. These processes include: -Flexible booking policy: In unforeseen situations, such as travel changes or cancellations, the Group offers flexible rescheduling or refund conditions, minimising financial and operational impacts on customers; -Proactive communication: Whenever relevant changes to services occur, such as renovation works, temporary unavailability of facilities, or changes to contractual conditions, customers are informed in advance, allowing them to make informed decisions regarding their stay; -Personalised support: Customer support teams and the Pestana Customer Ombudsman analyse each reported situation on an individual basis, proposing fair and appropriate solutions, which may include service upgrades, compensation, or alternative offers, depending on the nature of the identified impact; -Monitoring and follow-up: All complaints and reported situations are recorded and monitored until resolution, ensuring transparency, rigour and timely responses. In addition to the mechanisms described above, and in accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council, on the protection of persons who report breaches of Union law, and Law No. 93/2021, which establishes the General Regime for the Protection of Whistleblowers and transposes the Directive into national law, the Group implemented, in 2022, a Whistleblower Protection Policy. This policy regulates the use of the whistleblowing channel and the procedures for investigating and resolving received reports. A secure internal reporting channel has been established for the submission of reports by employees, supported by a set of internal rules that ensure the proper handling of potential reports. Any employee of the company, regardless of the type of employment relationship, as well as third parties external to the organisation – namely suppliers, customers or other business partners – may use this channel if they become aware of, or suspect, the existence of a regulatory breach or non-compliance with internal corporate standards. Reports may concern an employee or a third party with a relationship with the Group.	3.2. People: Valuing those who shape our story > Customer experience and wellbeing

ID	Topic	Information 2024	Location
S4-3_02	Channels for expressing concerns or needs	See S4-3_01	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-3_04	Monitoring and participation in dialogue channels	See S4-3_01	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-3_06	Protection against retaliation	See S4-3_01	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions		
S4-4_11	Communication of serious human rights issues	No serious human rights issues or incidents related to the Group's consumers and/or end-users were reported.	3.2. People: Valuing those who shape our story > Customer experience and wellbeing
G1 – GOVERNANCE			
G1-1	The role of the administrative, supervisory and management bodies		
G1.GOV-1_01	Disclosure of role of administrative, management and supervisory bodies related to business conduct	In 2019, PIH began laying the foundations for the Compliance Committee and approved the Compliance Manual. In 2021, it decided to formally establish the Compliance Committee, which designates the directors responsible for compliance matters within the Group companies and appoints the Compliance Officers. The operation of the compliance system is based on a vertical segregation of duties: members of the Compliance Committee may not be directors responsible for the compliance function, and the latter may not act as Compliance Officers. All members of the system are subject to a special duty of confidentiality regarding matters inherent to this function, particularly with respect to reports and complaints, except where disclosure is required to act in compliance with applicable obligations. The Compliance Committee is appointed for a five-year term, meets ordinarily every two months, and has the following responsibilities: -Monitoring the Group's activities in this area; -Ensuring the proper functioning of the compliance system and proposing relevant amendments to the Group; -Reviewing complaints and the semi-annual reports submitted by the Compliance Officers; -Promoting training and communication initiatives in this area.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1.GOV-1_02	Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters	The Group appointed one director to each Board of Directors of the Group companies, who in turn appoints a director responsible for the Compliance function. This director is responsible for implementing the Compliance Manual, coordinating the work of the Compliance Officers, and submitting the annual report on the analysis of non-compliance risks and on prevention and mitigation procedures to the respective Board of Directors.	3.3 Governance: leading responsibly and innovatively > Business Conduct

ID	Topic	Information 2024	Location
GI-1_01	Corporate culture	Based on a "people-to-people" approach, Pestana's culture is lived out every day by more than four thousand employees and is a direct reflection of our five guiding values: be Collaborative, be Passionate, be Efficient, be Conscious and be Agile. These values guide the behaviour, decisions and relationships of our teams, promoting a working environment that values personal and professional development, ethics and innovation. The culture is included in all initiatives and communications to make it present for everyone and is measured in our internal organizational survey.	-
GI-1_02	Mechanisms for identifying, reporting and investigating concerns regarding unlawful conduct	The Group has several mechanisms in place to identify concerns related to unlawful conduct or behaviour that does not comply with its Code of Conduct or similar internal rules. Firstly, any employee, as well as any manager, may report improper or non-compliant procedures to the hierarchy or directly to the Human Resources department. The Code of Conduct and Ethics (CCE) defines a set of conflict-of-interest situations that employees are required to observe. It also incorporates applicable compliance legislation, in particular regarding politically exposed persons. In addition, video surveillance systems are in place, with images routinely stored for one month, through which the Security team may verify certain improper procedures. Internal audits are also carried out, particularly in the form of mystery guest audits, to verify compliance with procedures. There is also a Customer Ombudsman, which customers of the Group may use. Finally, the Group has a whistleblowing channel, which guarantees anonymity and full protection for whistleblowers acting in good faith.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_03	Validation of alignment with the United Nations Convention against Corruption	The Code of Conduct and Ethics (CCE) is aligned with the United Nations Convention against Corruption.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_05	Whistleblower protection mechanism	A Whistleblower Protection Policy is in place and in force, guaranteeing anonymity. This Policy not only exists and is publicly available but has also been actively applied since 2022. For this purpose, a whistleblowing channel was created, the recipient of which is an entity external to the organisation. The Compliance Officer forwards the report to Pestana Hotel Group, anonymising the identity of the reporting person. Subsequently, the Group's structure carries out the investigations, inquiries and procedures deemed appropriate and reaches a decision on the matter. The decision taken is then communicated to the Compliance Officer, who subsequently transmits it to the person (employee or non-employee) who submitted the report.	Governance: Leading in a Responsible and Innovative Way
GI-1_06/07	Whistleblower protection policy	The adopted policy and implemented procedures guarantee the anonymity of the whistleblower.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_08	Procedures to investigate incidents of business conduct	The company has procedures in place to investigate incidents of business conduct, including corruption and bribery, through disciplinary procedures provided for in the Labour Code, as well as the procedures set out in the Commercial Companies Code, where applicable.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_09	Animal welfare policy	The company has animal welfare policies in place, implemented through a network of pet-friendly establishments.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_10	Training on business conduct	All employees, upon signing an employment contract with Pestana Hotel Group, must read, initial all pages, and sign the CEC.	3.3 Governance: leading responsibly and innovatively > Business Conduct
GI-1_11	Functions most exposed to the risk of corruption and bribery	The functions identified as most exposed to the risk of corruption and bribery are the Executive Committee, Legal Department, Information Systems, Operations, Communication, Promotion and Sales, Human Resources, and the Finance Department.	3.3 Governance: leading responsibly and innovatively > Business Conduct

ID	Topic	Information 2024	Location
G1-1_12	Coverage of legal requirements on whistleblower protection	Yes, Pestana Hotel Group is subject to compliance with this legislation (national legislation transposing Directive (EU) 2019/1937).	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-2	Management of relationships with suppliers		
G1-2_01	Policy to prevent delays in payments to suppliers	The Accounts Payable department is guided by the principle of complying with agreed payment terms and applies several practices aimed at minimizing delays in payments to suppliers: -Identification and categorization in the system of critical suppliers that require monitoring of their processes; -Monitoring of the internal approval process of documents in the system; -Support of many purchasing processes through a system-based logistics process (creation and prior approval of purchase orders) to streamline and accelerate invoice payment after registration, thereby shortening the agreed payment terms; -Monthly analysis of the ageing of outstanding invoices payable (supplier ageing), which allows the identification of potential delays and the implementation of corrective measures; -Monthly analysis of open items in the account "invoices under receipt and verification," enabling the identification of missing invoices (to request a duplicate due to possible loss) in processes where goods and/or services have been delivered/provided; -Monitoring of local suppliers with low invoicing volumes; -Monitoring of invoices requiring urgent payment that could jeopardize the provision of contracted services; -Contact, via email and/or phone call, with suppliers whenever additional information or documentation is required that prevents the registration and, consequently, the payment of the invoice; -Monthly sending to suppliers, by email, of a report of pending invoices awaiting a credit note, so that the supplier may act as soon as possible in providing justification and/or issuing the respective credit note.	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-2_02	Approach to supplier management and sustainability risks in the value chain	Although the Group does not yet have a defined policy, it is aware of the risks associated with its value chain, such as supply disruptions, variations in product quality, and unsustainable practices that may affect its operations and image. We recognize that effective value chain management is essential to mitigate these risks and ensure the continuity and quality of its products. These concerns are currently formalized with our suppliers, through a general supply agreement.	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-2_03	Supplier selection criteria	At present, no formal assessment is carried out considering social and environmental criteria for supplier selection, although there is a concern to select, for example, local suppliers and those for which no known negative issues exist. Visits are often made to the facilities of the most relevant suppliers in order to become familiar with their operating conditions.	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-3	Prevention and detection of corruption and bribery		
G1-3_01	Procedures to prevent, detect and respond to corruption and bribery	The procedures in force to prevent, detect and respond to conflicts of interest are set out in the Code of Ethics and Conduct (CEC) and are ensured through compliance with the law by the banking sector regarding declarations of interests of Directors, information on the ultimate beneficial owner, and declarations relating to politically exposed persons, as well as the operation of the whistleblowing channel.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-3_02	Impartiality of those responsible for investigating cases of corruption and bribery	To date, the inquiry committee is not separate from the management chain involved in the matter.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-3_03	Communication of investigation results to management, executive and supervisory bodies	Presentation of annual reports regarding the validity and application of the Compliance Manual to the various Boards of Directors and to the Executive Committee.	3.3 Governance: leading responsibly and innovatively > Business Conduct

ID	Topic	Information 2024	Location
G1-3_04	Plans to adopt anti-corruption and anti-bribery procedures	The Group plans to include these subjects in alignment with the entry into force of Decree-Law No. 109-E/2021 of December 9.	-
G1-3_05	Communication of anti-corruption policies to relevant stakeholders	The Group plans to include these subjects in alignment with the entry into force of Decree-Law No. 109-E/2021 of December 9.	-
G1-3_06	Training on anti-corruption and bribery: nature, scope and depth	The Group plans to include these subjects in the training programs in 2025, in alignment with the entry into force of Decree-Law No. 109-E/2021 of December 9.	-
G1-3_08	Training of management, executive and supervisory bodies on anti-corruption and anti-bribery topics	The Group plans to include these subjects in the training programs for higher-risk functions in 2025, in alignment with the entry into force of Decree-Law No. 109-E/2021 of December 9.	-
G1-4	Incidents of corruption or bribery		
G1-4_01/02/04	Number of convictions and fines for violations of anti-corruption and anti-bribery laws	Zero.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-4_03	Corrective measures and training actions in response to corruption and bribery infringements	The Group plans to include these subjects in alignment with the entry into force of Decree-Law No. 109-E/2021 of December 9.	-
G1-5	Political influence and lobbying activities		-
G1-5_01	Information on those responsible for overseeing political influence and lobbying	There are no representatives within the management bodies responsible for overseeing political influence (lobbying) activities.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_02	Approach to financial or in-kind political contributions	The companies of Pestana Hotel Group do not make contributions of this nature.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_03	Total value of financial political contributions made		3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_06	Total value of in-kind political donations made		3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_07	Method for estimating the value of in-kind contributions		3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_08	Information on political contributions (financial and in-kind)		3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_10	EU Transparency Register	Pestana Hotel Group is not registered in the EU Transparency Register.	3.3 Governance: leading responsibly and innovatively > Business Conduct

ID	Topic	Information 2024	Location
G1-5_11	Appointment of members of senior governing bodies coming from equivalent public functions	No members of the management, executive or supervisory bodies have been appointed who held a comparable position in public administration in the two years prior to the current reporting period.	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-5_12	Participation in sectoral organizations	One of the companies of Pestana Hotel Group is an associate member of the Ponta Delgada Chamber of Commerce and Industry, and most companies are members of sectoral and regional employers' associations (AHP/national scope, AHETA/Algarve, ACIF/Madeira, APCasinos/national scope).	3.3 Governance: leading responsibly and innovatively > Business Conduct
G1-6	Payment practices		
G1-6_01	Average number of days to pay invoices	The Group pays in accordance with the established deadlines and in line with the normal payment terms contractually agreed with suppliers. See point G1-6_02.	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-6_02	Normal (standard) payment terms	The payment terms applied depend largely on the category of goods/ services, as well as on the geographical region. Some examples include: USA, Africa and Europe – normal payment terms – between 15 and 30 days; Portugal – normal payment terms – between 30 and 75 days	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-6_03	Payments aligned with the standard	100%	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-6_04	Number of ongoing legal proceedings due to late payment	Zero.	3.3 Governance: leading responsibly and innovatively > Value chain management
G1-6_05	Contextual information related to payment practices	No sampling was used to calculate the information required under point (a). The calculation of the average payment period and the percentage of alignment was based on a full analysis of all supplier invoices recorded in 2023 and 2024 across all companies of Pestana Hotel Group (except for Brazil) Invoicing related to intercompany transactions and employee expenses was also excluded from this analysis.	3.3 Governance: leading responsibly and innovatively > Value chain management
ENTITY-SPECIFIC TOPICS			
Innovation and Technology – ESRS 2 MDR – Minimum disclosure requirement			
MDR-P – Policies adopted to manage material sustainability matters			
MDR-P_01	Description of the main contents and scope of the policy	Pestana Hotel Group is committed to manage all matters within its activities related to Innovation and Technology but does not yet have a Policy regarding this topic.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-P_02	Description of the scope of the policy or its exclusions	See above.	–
MDR-P_03	Description of the most senior level in the organization responsible for implementing the policy	See above.	–
MDR-P_04	Disclosure of standards or third-party initiatives respected through the implementation of the policy	See above.	–

ID	Topic	Information 2024	Location
MDR-P_05	Description of how the interests of stakeholders are considered in defining the policy	See above.	-
MDR-P_06	Availability of the policy to stakeholders	See above.	-
MDR-A – Actions and resources in relation to material sustainability matters			
MDR-A_01	Disclosure of the main action	Investment in Digital Transformation specifically in Opera Cloud and the redesign of the pestana.com website.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-A_02	Scope of the main action	Portugal hospitality units.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-A_03	Time horizon of the main action	Ongoing.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-A_04	Remediation actions and respective outcomes	Not applicable.	-
MDR-A_05	Progress of actions and previous plans	By the end of 2024, the system was connected to more than 30 units across the regions of Lisbon, Porto, Madeira, and the Azores and expanding.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-A_06	Financial and non-financial resources allocated to the action plan	10M€.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-M – Metrics in relation to material sustainability matters			
MDR-M_01	Metric used to assess performance and effectiveness	Metrics related to the actions described above are yet to be defined.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-M_02	Methodologies and assumptions of the metric	See above.	-
MDR-M_03	External validation of the metric	See above.	-
MDR-T – Tracking effectiveness of policies and actions through targets			
MDR-T_01	Link to policy objectives	Pestana Hotel Group hasn't yet defined Targets related to Innovation and Technology.	3.3 Governance: leading responsibly and innovatively > Innovation and Technology
MDR-T_02	Measurable target	See above.	-
MDR-T_03	Nature of the target	See above.	-
MDR-T_04	Scope of the target	See above.	-
MDR-T_05	Baseline value	See above.	-

ID	Topic	Information 2024	Location
MDR-T_06	Baseline year	See above.	-
MDR-T_07	Target period	See above.	-
MDR-T_08	Indication of milestones or interim targets	See above.	-
MDR-T_09	Significant methodologies and assumptions used to define the target	See above.	-
MDR-T_10	Scientific basis of environmental targets	See above.	-
MDR-T_11	Stakeholder involvement in defining the target	See above.	-
MDR-T_12	Changes to targets, metrics or measurement methodologies	See above.	-
MDR-T_13	Performance against the disclosed target	See above.	-
Data Protection and Cybersecurity – ESRS 2 MDR – Minimum Disclosure Requirements			
MDR-P – Policies adopted to manage material sustainability matters			
MDR-P_01	Description of the main contents and scope of the policy	Pestana Hotel Group's Privacy and Data Protection Policy define the principles and rules applicable to the processing of personal data in accordance with the General Data Protection Regulation. This Policy establishes the purposes of processing, the rights of data subjects, the technical and organisational measures applied to ensure the confidentiality and integrity of information, as well as the procedures for reporting and managing incidents.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-P_02	Description of the scope of the policy or its exclusions	All Pestana Hotel Group operations.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-P_03	Description of the most senior level in the organization responsible for implementing the policy	This Policy is supervised by the CIO (Chief Information Officer).	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-P_04	Disclosure of standards or third-party initiatives respected through the implementation of the policy	This Policy is aligned with the General Data Protection Regulation (GDPR).	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-P_05	Description of how the interests of stakeholders are considered in defining the policy	All Pestana Hotel Group's employees, customers and suppliers.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-P_06	Availability of the policy to stakeholders	The Policy is available at www.pestana.com/en/privacy-policy .	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity

ID	Topic	Information 2024	Location
MDR-A – Actions and resources in relation to material sustainability matters			
MDR-A_01	Disclosure of the main action	A specific training programme was developed and implemented. It was structured in five episodes that addressed the essential concepts of data protection and information security, the internal code of conduct, main threats and how to recognise them, with a special focus on phishing and procedures to adopt when a cyberattack or data breach is suspected.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-A_02	Scope of the main action	Mandatory for Shared Services, Front Office and unit management teams, and recommended for all employees.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-A_03	Time horizon of the main action	Yearly.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity
MDR-A_04	Remediation actions and respective outcomes	–	–
MDR-A_05	Progress of actions and previous plans	This initiative has strengthened digital literacy and consolidated prevention practices in line with the Group's security standards.	3.3 Governance: leading responsibly and innovatively > Data Protection and Cybersecurity

IRO TABLES

The following tables present the impacts, risks and opportunities (IROs) assessed as 'material' by the Group for each material sustainability issue, in accordance with the methodology described in Priorities [SBM-1] [SBM-2] [SBM-3] [IRO-1].

Climate Change [EI]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.			
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Climate Change	Hospitality, Real Estate, Beverages, Golf, Entertainment	Increase in direct GHG emissions from own operations (e.g. fuel and electricity consumption, industrial production, transport)	Negative	Real	Short term
	Real Estate	Increase in indirect GHG emissions across the value chain (e.g. supplier purchases, customer travel, among others)	Negative	Real	Short term
	Hospitality, Beverages, Golf, Entertainment	Increase in indirect GHG emissions across the value chain (e.g. supplier purchases, customer travel, among others)	Negative	Real	Short term
	Beverages, Golf, Hospitality, Real estate, Entertainment	Increase in energy consumption from non-renewable sources	Negative	Real	Short term
	Beverages, Golf, Hospitality, Real estate, Entertainment	Increase in energy consumption from renewable sources	Positive	Real	Short term
	Hospitality, Real estate, Beverages, Golf, Entertainment	Energy management systems	Positive	Real	Short term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Centralized Technical Management Systems (CTMS)	Positive	Potential	Medium term
	Hospitality, Real estate, Beverages, Golf, Entertainment	Reduction in energy consumption through energy efficiency gains	Positive	Real	Short term
Financial materiality		Main risks and opportunities that may influence the Group's business, classified according to the origin and time horizon of the occurrence, associated with the Group's various activities			
Sustainability topic	Economic activity	Potential financial effects	Type	Time horizon	Origin
Climate Change	Hospitality, Real estate, Beverages, Golf, Entertainment	Costs and investments arising from physical risks (e.g. resource scarcity, damage to equipment and infrastructure, floods, fires, among others)	Risk	Medium term	Dependency
	Hospitality, Real estate, Beverages, Golf	Investments arising from transition risks required by new legislation (e.g. investment in new technologies, renewable energy, energy-efficient equipment)	Risk	Long term	Dependency

Climate Change [E1]

Climate Change	Hospitality, Real estate, Beverages	Business and value chain resilience through investment in infrastructure and the establishment of redundancies	Opportunity	Short term	Dependency
	Hospitality, Real estate, Beverages, Golf Entertainment	Renewable energy production for self-consumption	Opportunity	Short term	Impact
	Hospitality, Real estate	Differentiation in the market by adopting GHG mitigation practices, attracting new customer segments concerned with environmental issues	Opportunity	Medium term	Impact

Resource use and management [E3] [E5]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities			
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Resource use and management	Hospitality, Beverages, Golf, Real Estate	Increase in water consumption in hospitality, production, and maintenance activities (e.g., golf) (contributing to the worsening of water-stressed areas)	Negative	Real	Short term
	Golf, Real Estate	Water reuse (rainwater, greywater, water storage)	Positive	Real	Short term
	Hospitality, Beverages, Golf, Real Estate	Reduction in water consumption through water efficiency gains (e.g., installation of efficient equipment)	Positive	Real	Short term
	Golf	Effluent management or control (domestic wastewater)	Positive	Real	Short term
	Real Estate	Intensive use of natural resources (use of virgin materials and packaging)	Negative	Real	Short term
	Hospitality, Beverages, Golf	Integration of circular economy or sustainable design projects (reuse, sharing, among others)	Positive	Potential	Short term
	Hospitality, Beverages, Golf, Real Estate	Generation of poorly segregated and treated waste (hazardous, non-hazardous, etc.)	Negative	Real	Short term
	Real estate, Beverages	Generation of industrial or construction waste (hazardous, non-hazardous, etc.)	Negative	Real	Short term
Financial Materiality		Main risks and opportunities that may influence the Group's business, classified according to their source and expected time horizon.			
Sustainability Topic	Economic Activity	Potential Financial Effects	Type	Time Horizon	Origin
Resource Use and Management	Hospitality, Beverages, Golf, Real Estate	Cost reduction through the installation of efficient water-use equipment and adoption of water-saving practices	Opportunity	Short term	Impact
	Hospitality, Golf	Regulatory restrictions on water supply or higher water tariffs in vulnerable areas	Risk	Short term	Dependency
	Hospitality, Beverages, Golf	Water scarcity during heatwaves affecting productivity and service quality	Risk	Short term	Dependency

Resource use and management [E3] [E5]

Resource Use and Management	Hospitality, Real Estate, Beverages, Golf	Increased costs related to raw material acquisition and waste management	Risk	Medium term	Impact
	Hospitality, Real Estate, Beverages	Fines and penalties for non-compliance with waste management regulations	Risk	Medium term	Dependency
	Hospitality, Real Estate, Beverages, Golf	Increased costs related to waste treatment fees	Risk	Short term	Dependency

NOTE: Although **Biodiversity and ecosystems** was not identified as a material topic for the Group, the identification of relevant IROs related to this theme has nonetheless been undertaken to ensure a comprehensive and balanced assessment.

Biodiversity and Ecosystems [E4]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.			
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Biodiversity and ecosystems	Hospitality, Real estate, Golf	Deforestation for the development of resorts and golf courses	Negative	Real	Short term
	Hospitality, Real estate, Golf	Destruction/fragmentation of habitats for the development of resorts and golf courses	Negative	Real	Short term
	Hospitality, Real estate, Golf	Habitat regeneration/restoration through reforestation projects and other initiatives	Negative	Real	Short term
Financial Materiality		Main risks and opportunities that may influence the Group's business, classified according to their source and expected time horizon.			
Sustainability Topic	Economic Activity	Potential Financial Effects	Type	Time Horizon	Origin
Biodiversity and ecosystems	Hospitality, Golf, Real Estate	Prohibition or adaptation of construction or operation in environmentally sensitive areas	Risk	Long term	Dependency
	Hospitality, Real Estate, Beverages, Golf	Financial penalties for non-compliance with new environmental regulations (e.g., Nature Restoration Directives, Environmental Impact Assessment rules)	Risk	Medium term	Impact
	Hospitality, Beverages, Golf	Prohibition on the use of certain pesticides, fertilizers, or invasive species	Risk	Medium term	Impact
	Hospitality, Real Estate	Integration of biodiversity criteria into construction or rehabilitation projects	Opportunity	Short term	Impact
	Hospitality, Beverages, Golf	Creation of hotels or developments with green spaces, gardens, wildlife observation areas, or ecotourism facilities	Opportunity	Medium term	Impact

Talent, development and diversity [S1]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.			
Sustainability Topic	Economic Activity	Impact on People and/or Planet	Positive or Negative	Real or Potential	Time Horizon
Talent, Development & Diversity	Hospitality, Real Estate, Beverages, Golf, Entertainment	Development of employees' skills	Positive	Real	Short-term

Talent, development and diversity [S1]

Talent, Development & Diversity	Hospitality, Real Estate, Beverages, Golf, Entertainment	Availability of training opportunities suited to roles and employee interests	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Creation of training programs to enhance technical and behavioural skills	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Social cohesion and equal opportunities	Positive	Real	Short-term
Financial Materiality		Key risks and opportunities that may influence the Group's business, classified according to origin and time horizon.			
Sustainability Topic	Economic Activity	Potential Financial Effects	Risk or Opportunity	Time Horizon	Origin
Talent, Development & Diversity	Hospitality, Real Estate, Beverages, Golf, Entertainment	Creation of career and development conditions that foster innovation and productivity	Opportunity	Medium-term	Dependency

Health, wellbeing and safety [S1]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.			
Sustainability Topic	Economic Activity	Impact on People and/or Planet	Positive or Negative	Real or Potential	Time Horizon
Health, Wellbeing & Safety	Hospitality, Real Estate, Beverages, Golf	Occurrence of accidents, injuries, and work-related illnesses	Negative	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf	Prevention of injuries and increased employee comfort in the workplace	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Improvement of workplace conditions and facilities	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Improvement of employee quality of life (e.g., benefits and wellbeing initiatives)	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Promotion of work-life balance	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Enhancement of workplace safety protocols and employee health programs	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Occupational stress and mental health issues associated with workload	Negative	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Limited employee quality of life due to absence of health promotion initiatives (e.g., screenings, psychological support, physical activity incentives)	Negative	Real	Short-term
Financial Materiality		Key risks and opportunities that may influence the Group's business, classified according to origin and time horizon.			
Sustainability Topic	Economic Activity	Potential Financial Effects	Risk or Opportunity	Time Horizon	Origin
Health, Wellbeing & Safety	Hospitality, Real Estate, Beverages, Golf, Entertainment	Non-compliance with health and safety regulations	Risk	Medium-term	Impact
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Absenteeism and loss of working days due to illness	Risk	Short-term	Dependency

Health, wellbeing and safety [S1]

Health, Wellbeing & Safety	Hospitality, Real Estate, Beverages, Golf, Entertainment	Legal penalties and compensation resulting from regulatory non-compliance	Risk	Medium-term	Impact
	Hospitality, Golf	Risks associated with contagious disease outbreaks, with significant impact on hospitality operations	Risk	Medium-term	Dependency

Involvement and development of local communities [S3]

Impact Materiality Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.

Sustainability Topic	Economic Activity	Impact on People and/or Planet	Positive or Negative	Real or Potential	Time Horizon
Community Engagement	Hospitality	Creation of value for local communities through support for social inclusion projects	Positive	Real	Short-term
	Hospitality	Preservation of local culture and identity	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Job creation and development of local enterprises (local economic clusters)	Positive	Real	Short-term
Local Community Development	Hospitality, Real Estate, Golf	Disruptions to landscape harmony and cultural heritage	Negative	Real	Short-term
	Hospitality, Real Estate	Improvement of local real estate heritage	Positive	Real	Short-term
	Hospitality, Real Estate	Rehabilitation of local/historical heritage	Positive	Real	Short-term
	Hospitality, Golf, Entertainment	Tourism pressure contributing to higher local cost of living	Negative	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf	Contribution to strengthening the local economy and community development	Positive	Real	Short-term
	Hospitality, Real Estate, Beverages, Golf	Creation of local employment opportunities	Positive	Real	Short-term

Financial Materiality Key risks and opportunities that may influence the Group's business, classified according to origin and time horizon.

Sustainability Topic	Economic Activity	Potential Financial Effects	Risk or Opportunity	Time Horizon	Origin
Community Engagement	Hospitality	Attraction of new clients who value companies committed to social impact	Opportunity	Long-term	Impact
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Reputational loss due to perceived lack of local involvement or interest	Risk	Medium-term	Impact
Local Community Development	Hospitality, Real Estate, Golf	Reputational gains from recognition of projects contributing to cultural or historical heritage conservation	Opportunity	Medium-term	Impact
	Hospitality, Real Estate, Golf	Reputational risk due to irreversible disruption of landscape harmony caused by new developments	Risk	Medium-term	Impact
	Hospitality, Golf, Entertainment	Investment in the local economy enhances destination attractiveness and hotel competitiveness	Opportunity	Short-term	Impact
	Hospitality, Golf, Entertainment	Increased local taxes or fees in response to pressure on the regional economy	Risk	Short-term	Impact

Customer experience and development of local communities [S4]

Impact Materiality		Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.			
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Guest Experience and Wellbeing	Hospitality, Golf, Entertainment	Guest safety ensured through hygiene practices in units and products	Positive	Real	Short-term
	Hospitality, Golf, Entertainment	Guest wellbeing and comfort ensured by compliance with safety and hygiene standards	Positive	Real	Short-term
	Hospitality, Beverages	Exposure of guests to health and safety risks due to hygiene, food safety, fire safety, or structural issues	Negative	Real	Short-term
	Hospitality	Food safety	Positive	Real	Short-term
	Hospitality, Real Estate, Golf, Beverages, Entertainment	Continuous improvement in food nutrition and production processes (hospitality meals)	Positive	Potential	Medium-term
	Hospitality, Golf, Beverages, Entertainment	Customer satisfaction through quality services and products that meet expectations and needs	Positive	Real	Short-term
	Hospitality, Golf, Beverages, Entertainment	Promotion of sustainable behaviors among guests	Positive	Real	Short-term
	Hospitality, Golf, Beverages, Entertainment	Contribution to the appreciation and promotion of local culture	Positive	Real	Short-term
	Hospitality, Golf, Beverages, Entertainment	Lack of accessibility, inclusion, or personalization in hospitality services	Negative	Real	Short-term
	Hospitality, Golf, Beverages, Entertainment	Transparency and communication with guests	Positive	Real	Short-term
Financial Materiality		Key risks and opportunities that may influence the Group's business, classified according to origin and time horizon.			
Sustainability Topic	Economic Activity	Potential Financial Effects	Risk or Opportunity	Time Horizon	Origin
Guest Experience and Wellbeing	Hospitality, Golf, Entertainment	Non-compliance with regulatory requirements	Risk	Medium-term	Impact
	Hospitality	Reputational risk associated with security issues in specific geographies	Risk	Medium-term	Dependency
	Hospitality, Beverages	Non-compliance with safety, nutrition, and product quality regulations	Risk	Medium-term	Impact
	Hospitality, Real Estate, Golf, Beverages, Entertainment	Risk associated with inconsistency in product and service quality	Risk	Medium-term	Impact
	Hospitality	Attraction of sustainability-conscious customers	Opportunity	Medium-term	Impact
	Hospitality, Real Estate, Golf, Beverages, Entertainment	Establishing high quality standards to build trust, loyalty, and attract new customers	Opportunity	Medium-term	Impact
	Hospitality, Real Estate, Golf, Beverages, Entertainment	Reputational loss and reduced customer loyalty	Risk	Short-term	Impact

Customer experience and development of local communities [S4]

Guest Experience and Wellbeing	Hospitality, Real Estate, Golf, Beverages, Entertainment	Risk of litigation or complaints due to non-compliance with safety or hygiene standards	Risk	Short-term	Dependency
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Business Conduct [G1]

Impact Materiality Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.

Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Business Conduct	Hospitality, Real Estate, Beverages, Golf, Entertainment	Promotion of good governance practices across the Group's sectoral and geographical ecosystems, generating trust (particularly among employees)	Positive	Real	Short term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Adoption of transparent and responsible business conduct practices	Positive	Real	Short term

Financial Materiality Key risks and opportunities that may influence the Group's business, classified according to origin and time horizon.

Sustainability Topic	Economic Activity	Potential Financial Effects	Risk or Opportunity	Time Horizon	Origin
Business Conduct	Hospitality, Real Estate, Beverages, Golf, Entertainment	Loss of customers, partners, or employees due to perceptions of unethical behaviour or lack of business integrity	Risk	Medium term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Fines or sanctions resulting from non-compliance with ethical and regulatory standards	Risk	Short term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Attraction of new customers, partners, and employees who value companies with ethical and transparent business practices	Opportunity	Long term	Impact
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Prevention of operational costs or inefficiencies associated with corruption through the implementation of ethics and anti-corruption training programs	Opportunity	Short term	Impact

Value Chain Management [G1]

Impact Materiality Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.

Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Value Chain Management	Hospitality, Real Estate, Beverages, Golf	Promotion of social and environmental best practices in the supply chain (products, services, logistics) through the integration of ESG criteria in supplier assessment and selection	Positive	Potential	Long term
	Hospitality, Real Estate, Beverages, Golf	Economic development through the preference for local suppliers	Positive	Potential	Long term
	Hospitality, Real Estate, Beverages, Golf	Forced labour or child labour practices upstream in the value chain	Negative	Potential	Long term
	Hospitality, Real Estate, Beverages, Golf	Lack of workplace safety within the value chain	Negative	Potential	Long term

Value Chain Management [G1]

Value Chain Management	Hospitality, Real Estate, Beverages, Golf	Uncontrolled subcontracting leading to loss of visibility, supervision, or hiring criteria	Negative	Real	Long term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Good supplier payment practices (avoiding overly restrictive payment terms and delays)	Positive	Real	Short term
Financial Materiality	Main risks and opportunities that may influence the Group's business, classified according to their source and time horizon, and associated with the Group's various activities.				
Sustainability Topic	Economic Activity	Potential Financial Effects	Type	Time Horizon	Origin
Value Chain Management	Hospitality, Real Estate, Beverages, Golf, Entertainment	Higher procurement costs associated with the integration of ESG criteria	Risk	Medium term	Impact

Data Protection and Cybersecurity

Impact Materiality	Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.				
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Data Protection and Cybersecurity	Hospitality, Real Estate, Beverages, Golf, Entertainment	Customer and consumer data privacy	Positive	Real	Short term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Technological resilience	Positive	Real	Short term
Financial Materiality	Main risks and opportunities that may influence the Group's business, classified according to their source and time horizon, and associated with the Group's various activities.				
Sustainability Topic	Economic Activity	Potential Financial Effects	Type	Time Horizon	Origin
Data Protection and Cybersecurity	Hospitality, Real Estate, Beverages, Golf, Entertainment	Operational disruptions due to cyberattacks	Risk	Short term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Legal penalties for non-compliance with data protection regulations such as GDPR	Risk	Medium term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Investment in cybersecurity systems can prevent financial and operational losses	Opportunity	Short term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	High costs associated with data and system recovery following cyberattacks	Risk	Medium term	Dependency

Innovation and Technology

Impact Materiality	Critical impacts affecting people and/or the environment, classified as positive/negative, real/potential, and associated with the Group's various activities.				
Sustainability Topic	Economic Activity	Impact on People and/or the Planet	Positive or Negative	Real or Potential	Time Horizon
Innovation and Technologies	Hospitality, Real Estate, Beverages, Golf, Entertainment	Integration of new technological solutions (robotization) in services, improving consumer comfort and/or environmental performance	Positive	Real	Short term
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Reduction of material waste (paper, food waste, etc.) through operational digitalization	Positive	Real	Short term

Innovation and Technology

Innovation and Technologies	Hospitality, Real Estate, Beverages	Decrease in employee workload through process automation	Positive	Real	Medium term
	Hospitality, Golf, Entertainment	Digital accessibility (simplified and convenient access to services)	Positive	Real	Short term

Financial Materiality Main risks and opportunities that may influence the Group's business, classified according to their source and expected time horizon, associated with the Group's various activities.

Sustainability Topic	Economic Activity	Potential Financial Effects	Type	Time Horizon	Origin
Innovation and Technologies	Hospitality, Real Estate, Beverages, Golf, Entertainment	Increased competitiveness through integration of technology into products and services	Opportunity	Medium term	Impact
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Investment in innovation over a 3–5-year period	Opportunity	Medium term	Impact
	Hospitality, Real Estate, Beverages	Investment in upskilling and reskilling	Opportunity	Medium term	Impact
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Access to capital	Opportunity	Medium term	Dependency
	Hospitality, Real Estate, Beverages, Golf, Entertainment	Reduction of operating costs and potential productivity increase through digitalization and dematerialization	Opportunity	Medium term	Impact



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