

Quality, Environment, Occupational health and safety, Guest satisfaction and Food Safety Policy;

As management and employees of Hilton Dalaman Sarigerme Resort & Spa;

- To analyze the desires of our guests, employees and co-partners and provide the service according to these wishes,
- To be able to respond all the complaints objectively protecting the rights of our guests and employees,
- To improve quality, significance of environment, occupational safety, provide guest satisfaction, hygiene, food safety and development of our employees by continuing education,
 - To carry out food safety and hygiene standards at the stages of raw material procurement, storage and presentation of food by the employees,
- To perform the service showing required sensitivity with Hilton standards, national or international regulations/conditions and the approaches of preventing occupational safety risks and increasing guest satisfaction,
- To lower pollution our activities cause at the lowest level, to follow and perform the
 technological advancements for utilizing natural resources appropriately; to share our
 performances in favor of protecting the environment with our employees, guests,
 suppliers and society; to research, plan and apply the principles of preservation of
 biodiversity and efficient energy use,
- To make activities measurable that affect the quality, to evaluate the results and to enhancing the efficiency of integrated management system.

General Manager 01.08.2013

POL/GM/001 Yayın Tarihi: 28.03.2010 Rev No: 01

ENVIRONMENTAL POLICY STATEMENT



At Hilton, we are committed to fostering responsible travel and tourism through our ESG strategy, Travel with Purpose. We recognize our responsibility to be stewards of the environment and the precious natural and cultural heritage of the communities in which we operate. We are committed to operating in a way that contributes to a sustainable future for our planet, while creating heartfelt experiences for our Guests and meaningful opportunities for our Team Members.*

SCOPE

The Environmental Policy Statement applies to Hilton's corporate offices and Hilton-owned, leased and managed hotels. Hilton expects its suppliers and business partners to comply with all laws and regulations, and is committed to working with owners, franchise partners, and others in its value chain to elevate their ability to bring positive change in their own operations and business relationships.

As environmental stewards, we commit to:

GOOD GOVERNANCE

- Comply with all laws and regulations pertaining to our operations, and meet all
 voluntary requirements to which Hilton subscribes. Where national law and
 international standards differ, we shall respect the law of the land, while seeking
 ways to advance international standards consistent with this Statement.
- Measure, manage and reduce our environmental impact across our global portfolio through our proprietary ESG performance management system LightStay, use of which has been required as a Brand Standard since 2009 for all owned, managed and franchised hotels.
- Annually set and review environmental performance objectives for all hotels through LightStay.
- Conduct regular audits of our environmental and energy management systems, and continue to seek third-party data validation. Our entire portfolio is currently accredited to ISO 9001 (Quality Management), ISO 14001 (Environmental Management) and ISO 50001 (Energy Management).
- Continuously explore innovative solutions to reduce our reliance on natural resources and design our properties for efficiency.

ENVIRONMENTAL STEWARDSHIP

- We will address the following material areas across our value chain:
- **Energy** Ensure the responsible use of energy, by reducing consumption, improving energy efficiency and giving preference to renewable energy sources when feasible.
- Carbon Take action to reduce carbon emissions in line with the 2
 degrees pathway established by the United Nations Framework Convention on
 Climate Change and the Paris Climate Agreement.
- **Water** Demonstrate water stewardship by reducing our water consumption and mapping global water risks, with particular emphasis on identifying and implementing innovative solutions in high water risk locations.

ENVIRONMENTAL POLICY STATEMENT



- **Waste** Reduce our waste production, increase our diversion from landfill, responsibly handle, store and dispose of all hazardous waste, and reduce food, plastics and packaging waste.
- **Sustainable sourcing** Integrate consideration of suppliers' environmental sustainability into our purchasing decisions, including giving priority to resource-efficient products and services, local produce, and following our commitments to sustainable food.
- **Supply chain logistics** Evaluate opportunities to improve supply chain sustainability, such as using EPA's SmartWay program to measure and improve freight transportation efficiency, where possible.
- **Animal welfare** Eliminate the procurement of any endangered species and consider animal welfare in purchasing decisions and operations.

STAKEHOLDER ENGAGEMENT

- Raise awareness, train and empower employees to take action on preserving the environment. Provide our employees with the frameworks and tools to achieve efficient performance and reduce our reliance on natural resources.
- Engage Guests in supporting destination stewardship, including raising awareness and promoting respect for our natural and cultural heritage.
- Raise awareness with, build capacity for and expect similar environmental standards from all business partners in our value chain, including our franchisees and suppliers.
- Take steps to engage key partners during the property due diligence process to address climate change risks, and develop ESG risk mitigation plans for new hotel developments and properties entering our portfolio, where applicable.
- Be an environmentally responsible neighbor in our local communities.
- Participate in local, national and international discussions around environmental issues, including climate change.
- Regularly report our environmental performance to our Hilton leadership, including reporting to our CEO and Board of Directors at a minimum of once per year.
- Transparently communicate our environmental objectives and progress to our external stakeholders on a regular basis, through our annual ESG reporting and other external communications.

COMMUNITY ENGAGEMENT POLICY



Hilton Dalaman Sarigerme Resort & Spa team members share responsibility with Hilton Dalaman Resort & Spa to ensure positive relationships with the local community and activities in the Dalaman-Ortaca region.

Where possible, Hilton Dalaman Sarigerme Resort & Spa has positive social and economic impacts and minimizes and eliminates negative situations.

Our Local Community Policy and our primary objectives are as follows:

1. Promotion of Responsible Tourism in the Area

Hilton Dalaman Resort & Spa is a member of the GETOB (South Egean Tourism and Hoteliers Council) Through this forum we are able to promote and improve greater economic and social benefits for the residential and business community.

The Hotel also works with local schools and colleges upon request to provide accommodation and where possible, work experience opportunities especially on biodiversity researches.

2. Purchasing

Hilton Dalaman Resort & Spa purchases and promotes produce from the local area, whilst ensuring that quality of food does not compromise the comfort of our guests. This will help reduce CO2 emissions from transportation of products from international destinations. Wherever possible, we pay our suppliers within the credit terms they request.

3. Employment

The hotel recognizes the importance of recruiting local people as preferred employees. This increases the likelihood of monies being spent in the local community. Additionally, it encourages local residents to stay within the community, rather than seeking employment outside of the community. The policy preserves our destination which is the bases for prospective and repeat guests.

4. Donations and Charity

Hilton Dalaman Resort & Spa donates items such as furniture, linen or uniforms that are no longer suitable for use within the hotel, to local organisations that may benefit from them (e.g. schools, local hospitals, community groups, etc). The hotel also carefully considers how it may help the local community by the provision of in-kind support, meal donations, sponsoring and providing hotel facilities and services for local events and organisations.

Our vision:

Hilton Dalaman Resort & Spa aims to improve its local community relationships in 2012 by introducing sponsorship of local sports teams. It is also providing use and access to the private beach, hotel recreation facilities and onsite SPA to local people.

Once a week we will provide free shuttle for our guests to the local bazaar and let the local craftsman to showcase their products to our guests and give them the opportunity to sell their products regularly.



Travel with Purpose is Hilton's Environmental, Social and Governance (ESG) commitment to advance responsible travel and tourism globally and to drive positive social and environmental change across our operations, our supply chain and our communities.

Hilton Team Members* are expected to act with the highest standard of integrity when conducting Hilton business. Integrity means doing what's right, all the time, and encouraging those around us to do the same. This culture of integrity that governs our Team Members, and the way we interact with our guests, our business partners, and the communities where we operate is the key to our Mission to be the preeminent hospitality company. As part of our commitment to Travel with Purpose we seek to do business with partners that share our high standards when it comes to integrity.

The Hilton Code of Conduct holds the company to the highest ethical standards, particularly during challenging situations. The Code of Conduct provides guidance about how we all must work together to maintain the highest ethical standards in the hospitality business. We expect our suppliers to adhere to the fundamental principles outlined in our Code of Conduct, which are reflected in this Responsible Sourcing Policy.

The Responsible Sourcing Policy outlines the standards expected of Hilton suppliers. Suppliers are encouraged to have appropriate management systems in place and take steps to comply with this Policy, including transparency concerning policies and practices and related employee education. We encourage our suppliers to hold their suppliers and subcontractors accountable to these standards.

Hilton reserves the right to conduct unannounced assessments, audits and inspections of supplier facilities to ensure that reasonable efforts are being taken by our suppliers to operate in a manner consistent with the fundamental principles of this Responsible Sourcing Policy. Violations may lead to disciplinary action, including termination of the supplier relationship for repeated violations or noncompliance.

For the purposes of this document "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services to Hilton.































FUNDAMENTAL PRINCIPLES

Legal compliance. Hilton abides by our high standards of business ethics everywhere we operate. Our Code of Conduct is clear - we comply with all applicable laws. Sometimes our standards exceed those requirements, but they never fall below them. We expect our business partners in their interactions with Hilton and their activities on Hilton's behalf to work together with us to support this commitment to integrity. If suppliers witness or suspect conduct that is inconsistent with this Policy or the law, we want to know about it. Suppliers can raise concerns about business ethics to their Hilton Supply Management main point of contact. The Hilton Hotline website is also available as a confidential mechanism to report concerns.

Purchasing Practices. We strive to be fair and impartial in our dealings with suppliers and outside contractors. Purchasing decisions must be based on legitimate, defined criteria, including quality, service levels and price. We honor the terms and conditions of contracts, pay in a timely manner, and protect the confidentiality of the proprietary information of suppliers and outside contractors.

Fair Dealing. Hilton strictly prohibits Team Members from giving, paying, offering or promising anything of value to any person for the purpose of influencing official action or gaining an improper advantage. This prohibition applies both to activities undertaken directly by Team Members and to activities that may be undertaken by third parties on behalf of Hilton.

Protecting & Using Information Hilton is committed to safeguarding and handling third party information in accordance with applicable laws, our policies, contractual obligations, and in a manner that protects privacy, preserves customer and Team Member trust, and meets our shareholders' expectations. Hilton does not tolerate the inappropriate acquisition, possession or use of proprietary, confidential or trade secret information of Hilton's competitors or other third parties, such as vendors, suppliers, owners and former employers.

Bribery & Other Corrupt Practices Hilton is committed to conducting its business in compliance with all laws prohibiting bribery and other corrupt practices. As a U.S. based company, Hilton's business operations around the world must comply not only with local anti-corruption laws, but also with laws that globally apply to Hilton's business activities, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These anti-corruption laws prohibit Hilton from offering or giving "anything of value" to a government official or their family members to influence that person in his or her official duties or to encourage improper or unlawful conduct.































Human Rights. Hilton complies with the employment and labor laws in every country and region in which we operate. We support fundamental human rights for all people and expect our suppliers to uphold the same standards. This means, among other things, that:

We will not employ individuals who are under 15 years of age or the lawful age of employment (whichever is higher) in any country in which we operate.

- We comply with all wage and compensation requirements as defined under applicable local laws and regulations, including those relating to minimum wages and at a minimum provide legally mandated benefits.
- We will not exceed maximum hours of work defined by applicable law and will appropriately compensate overtime.
- We will not use forced labor, including prison, bonded or debt labor.
- We will not allow physical punishment or abuse of any Team Member.
- We respect the ability of Team Members to exercise their lawful right of free association.
- We respect the lawful rights of our Team Members to choose (or not choose) bargaining representation.

Harassment & Non-Discrimination. Hilton does not tolerate any form of harassment or discrimination based on any characteristic protected by applicable law. Any behavior, communication, or other conduct that creates an intimidating, offensive, abusive or hostile work environment, or that otherwise interferes with any Team Member's ability to perform his or her job is unacceptable.

It is the policy of Hilton to employ qualified persons without regard to the individual's sex, color, race, religion, national origin, age, disability, sexual orientation, gender identity or any other protected group status as defined by and subject to applicable local laws. This policy describes the Company's commitment to equal employment opportunity, which supports the attraction and retention of a diverse workforce that will enhance the Company's competitiveness in attracting customers, corporate partners, and owners.

Diversity. We seek to understand our unique global communities, while developing culture, talent and marketplace strategies that cultivate a work environment of inclusiveness. We will maintain our competitive position by valuing and leveraging the diversity of our Team Members, guests, suppliers, partners and owners. It is the policy of Hilton to actively encourage diverse suppliers who provide quality products at competitive pricing to participate in our contracting and subcontracting activities.































Safe & Healthy Work Environment. Hilton is committed to the health and safety of our quests, Team Members and business colleagues. Each Team Member and supplier is responsible for understanding and complying with all applicable safety and health laws and guidelines. In addition, we are each responsible for identifying and responding to health and safety hazards and security concerns.

Prohibition Against Human Trafficking. Hilton condemns all forms of human trafficking and commercial exploitation, including the sexual exploitation of men, women or children. As signatories of the ECPAT Tourism Child-Protection Code of Conduct, we are fully committed, in each and every one of the markets in which we operate, to protecting individuals from all forms of abuse and exploitation. We expect our Team Members as well as our business partners to help us meet this commitment. Sex trafficking and sexual tourism is a large and growing problem worldwide, and Hilton must never allow any Hilton properties, products, or services to be used in any manner that supports or enables any form of abuse and exploitation.

Commitment to our Communities. As a world leader in travel and tourism, Hilton recognizes our responsibility to create shared value wherever we do business. We actively support a wide variety of issues and organizations material to our business and encourage all of our Team Members and business partners to volunteer or participate in the economic and social development of their local communities as they deem appropriate.

Anti-Money Laundering. Team Members are prohibited from engaging in or facilitating transactions anywhere in the world that involve funds that were derived from illegal activities and expect the same from our suppliers. Hilton must comply with all applicable anti-money laundering laws, rules and regulations of the U.S. and all other countries where we do business. Therefore, we must carefully scrutinize all payments and transactions with customers, vendors, business partners, agents and affiliates. We will not accept any funds or make any payments that appear to be derived from illegal activities.

Animal Welfare. Hilton is committed to the humane treatment of animals. Hilton encourages its suppliers to implement humane procedures to prevent the mistreatment of animals at all times, including when they are raised, cared for, transported, and processed.





























Commitment to the Environment. Hilton continually strives to minimize the amount of waste we generate and energy we consume. Our goal is to continually move towards the use of renewable materials and biodegradable substances wherever practicable and financially feasible. As Hilton provides information to its stakeholders on how we effectively manage our environmental performance, we further rely upon our suppliers to provide similar information and work collectively toward this goal.

Throughout the term of the relationship, and otherwise at Hilton's request, Supplier shall provide information on its efforts to identify, monitor and minimize the environmental impacts of its operations. Objectives should include:

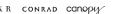
- At a minimum, ensure compliance with local, state and national environmental legislation.
- Strategically look to minimize its environmental footprint, and identify program successes in this area.
- Minimize the use of endangered and non-renewable raw materials wherever practicable and feasible.
- Incorporate the use of recycled materials where practicable and feasible in the manufacturing process.
- Implement programs to recycle waste resulting from the manufacturing process
- Seek operational processes that result in energy savings.
- Implement the use of sustainable alternatives to fossil and unnatural materials and processes where applicable.
- Continue to educate themselves and Hilton on the concept of sustainability as it relates to their business.
- Participate in industry standardization programs as they are developed related to sustainability.

Sustainable Forestry. Hilton expects its vendors and their suppliers of wood and paper products to maintain compliance with laws and regulations pertaining to their operations and the products they manufacture. Hilton will not purchase wood or paper products made with illegally harvested or traded wood.

Transparency and responsible sourcing in our supply base is important and therefore Hilton gives preference to recycled and certified products and those protecting High Conservation Value Forests, avoiding natural forest conversion and ensuring protection of human, civil and labor rights wherever feasible. We understand there are many forest certification options and will give preference to Forest Stewardship Council (FSC) certified products based on regional risk and if all other product attributes are equal.































We consider certifications legitimate if they have independent governance, multistakeholder inputs (including board representation), independent certification with independent auditors, complaints and appeal process, transparency, and open participation.

*Team Members include employees at Hilton corporate offices and its owned and managed properties, and employees of franchisees who work on-property at independently owned and operated franchise properties in the Hilton portfolio.

Hilton reserves the right to amend or modify this Responsible Sourcing Policy. Last updated April 2021.







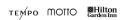


























1. Sustainable Purchasing Policy

Hilton Dalaman Sarigerme recognizes the positive impact that it can make on a more sustainable future through environmentally conscious purchasing decisions. It is the intent of to integrate sustainability

into every aspect of its business including the acquisition of goods and services which will result in social, cultural, economic and environmental gains that will further our company-wide goals and commitments.

2. Scope

The hotel's Sustainable Purchasing Policy should address the vast range of products and materials that are purchased throughout the hotel. This includes purchase of ongoing supplies and hotel equipment as well as purchases of furniture, fixtures and equipment and other materials used or purchased as part of hotel renovation activities. This sample policy document addresses the following purchasing categories:

- General office and paper supplies
- Electric equipment and appliances
- Furniture purchases
- Food and beverage products
- Recommended best practices for source reduction and waste minimization

3. Sustainability Goals

Through the development of its Sustainable Purchasing Policy, Hilton Dalaman Sarigerme has established the following purchasing goals:

· Specify the use of sustainable office supplies and paper used throughout the hotel. The hotel

commits to future purchases of office supplies and paper:

- · Specify the purchase of energy-efficient equipment and appliances throughout the hotel where feasible. The hotel commits to future purchases of qualified energy-efficient equipment.
- \cdot Specify the purchase of sustainable furniture throughout the hotel where feasible. The hotel commits to future purchases of sustainable
- · Specify the purchase of sustainable food and beverage throughout the hotel where feasible. The hotel commits to future purchases of sustainable food.
- · Implement best management practices and technologies that minimize the purchasing requirements and use of non-renewable resources throughout the hotel. These efforts will also help the hotel achieve its waste reduction and recycling goals.

4. Implementation Summary

Following is a recommended action plan for developing and implementing the



sustainable purchasing

policy. The sustainable purchasing criteria and recommended strategies are discussed in more detail

below.

· Review your current purchasing practices, including product purchases and source reduction efforts

that are within the hotel's control.

- · Compare current practices with the goals and recommendations provided in this plan as well as other available resources. Note that this document does not encompass the full range of hotel purchases.
- · Identify gaps in current purchasing and management practices and outline areas where improvements could reasonably be implemented. This will likely involve research and coordination with vendors and others to assess environmentally-preferred alternatives.
- Develop and implement the hotel's Sustainable Purchasing Policy with specific purchasing practices and operating requirements that will enable the hotel to achieve its sustainability goals.
- · Establish procedures for monitoring compliance and sustainable purchasing performance on an ongoing basis.

5. Sustainable Purchasing Criteria

The following sections provide a range of sustainability criteria that may apply in each of the respective product categories. Please note that the sustainability criteria and product availability will vary by country or region, and product quality as well as cost should be considered in your selection process.

A product may also be specified as "ecolabelled", certifying that it meets certain environmental criteria. A listing of many international ecolabels is included in the attached Exhibit A.

5.1 General Office and Paper Supplies

Sustainable office supplies have greatly increased in availability and cost effectiveness, and options for many products should be readily available through your supplier. In most cases, the vendor or supplier will specify the product as a "green" or "environmentally preferable" option, listing the key environmental attributes or designated "ecolabel". Sustainability standards and recycled content will vary by country or region, and product quality as well as cost should be considered in your selection process.

Following are the recommended attributes to consider when purchasing sustainable office supplies and paper products.



5.2 Energy Efficient Equipment and Appliances

The sustainability criteria for electrical equipment and appliances will vary according to region and

country. Equipment deemed energy-efficiency may be "ecolabelled" or display an energy efficiency rating

or label (such as the U.S. EPA Energy Star® or EU Energy Label®). Following is a listing of typical hotel

electrical equipment and appliances that should be considered for future energy efficient purchases where available and cost effective given potential energy savings. Appliances that are deemed water efficient should also be considered (i.e., clothes and dish washers).

Office and Guest Room Electrical Equipment:

- Computers and Monitors
- Printers, Copiers, Scanners and Fax Machines
- External Power Adapters and Battery Chargers
- Postage Machines and other office equipment
- Televisions and Video Equipment
- Telephones and Clock Radios
- Coffee Makers
- Microwave ovens and stoves
- Refrigerators/mini-bars
- Dishwashers
- Kitchen and Housekeeping Appliances:
- Washers and Dryers
- Ironing and Folding Equipments
- Refrigerators and Freezers
- Dishwashers
- Ovens and Ranges
- Fryers and Steam Cookers
- Hot Food Holding Cabinets
- Ice Machines
- Miscellaneous cooking appliances where applicable
- Other
- Audio-Visual Displays and Equipment
- Vending Machines
- Ice Makers and Water Coolers
- AC units and Ceiling Fans
- Dehumidifiers and Air Cleaners

5.3 Sustainable Furniture

Where practical and consistent with the Brand Standards, the hotel should consider



purchasing furniture that meets one or more of the following criteria:

Contains minimum 10% post-consumer or 20% post-industrial recycled content recommended.

- Made from rapidly renewable materials (all or partially)
- Made from FSC (Forest Stewardship Council) certified wood (all or partially)
- Manufactured locally or uses materials locally harvested or extracted (within 500 miles)
- Furniture of sufficient quality that it can be refinished or reupholstered
- Furniture that is re-used or salvaged from on-site or off-site sources

5.4 Sustainable Food and Beverage

Sustainable Food and Beverage is a broad area that encompasses addresses a vast range of products used and served in a hotel's food and beverage operations. In general, sustainable food products are defined as those that minimize the use of pesticides and other chemicals, promote health and biodiversity, and reduce the environmental and social equity impacts of food production and distribution.

Standards and product availability will vary by country and region. For your information, we have included a sample list of sustainability criteria below. Additional information is included in a separate document (see Sample Sustainable Food and Beverage Criteria) in the Food and Beverage section.

For food and beverages, sustainable purchases are generally defined as those that meet one or more of the following criteria:

- · Locally-sourced foods
- · Certified Organic
- · Fair Trade certified
- · Vegetarian/Vegan options
- · Free-range foods
- · Ecolabelled: examples include Rainforest Alliance, Fair Trade and Protected Harvest

5.5 Source Reduction

The hotel shall implement purchasing and operating requirements which strives to reduce unnecessary purchases and wastes generated through its ongoing operations. Source reduction considers the lifecycle assessment of the product from the impacts of how it was manufactured and transported to the impacts caused by the product's disposal. Of course, avoiding the purchase of the product in the first place is the ultimate source reduction goal.

Sustainable Office Practices: Following are examples of technologies and best practices that reduce the use of paper and other disposable general office supplies:

Electronic guest communications using email and website including room reservations and confirmations, floor plans, menus, rooming lists, BEO's, etc.



- · Use of electronic signage for announcements and events
- · Minimize internal paper use and filing requirements through email communications and electronic document storage.
- · Reduce paper used for printing ongoing forms and daily reports through redesign or distribution via electronic format where possible.
- · Printing and photocopying using double-sided print settings where possible
- · Design mailers that avoid the use of envelopes (by folding and stapling the paper)
- · Print directly on envelopes rather than using labels.
- · Collect paper that has been used on one side and re-use as draft and scratch paper
- · Reuse file folders, storage boxes and other office supplies where possible
- · Purchase remanufactured products such as laser toner cartridges and office equipment where practical.
- · Purchase and use of rechargeable batteries
- · Purchase products that are durable, reusable or refillable where feasible
- · Purchase products with minimal packaging or recycled-content packaging Food and Beverage Service: Following are examples of best practices that reduce the environmental impacts from food and beverage service items:
- · Minimize use of disposables by using china, glass and flatware for restaurant, meetings and events,

and room service

- \cdot Serve condiments in washable containers wherever feasible for restaurant, room service and meeting/event food service
- · Use table linens where possible instead of disposable tablecloths and napkins
- · Use durable, reusable table decorations for meetings and events
- \cdot Use recyclable, compostable and/or biodegradable food service items and containers where they must be used (such as to-go meals and poolside food service)
- · Purchase F&B items used for meal preparation in bulk where possible
- · Purchase F&B items that minimize over-packaging; or those use recyclable or recycled-content materials
- · Require vendors to take back pallets or other reusable containers Sample Sustainable Purchasing Policy Page 5 of 8 Prepared by KEMA Services, Inc.