

LOUIS

Sustainability Report

2025



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Introduction

At Louis Public Company Ltd (“the Group”), sustainability is an integral part of our business development, driving responsible growth and long-term resilience.

The Group has been complying with the NFRD, while also incorporating certain reporting principles which arose from the Corporate Sustainability Reporting Directive (CSRD) on a voluntary basis for the first time in 2024. This has strengthened our reporting practices to ensure greater transparency, accountability and alignment with evolving regulatory expectations. With the transposition of CSRD into Cypriot law, as of 2025, the group is reporting in accordance with the European Sustainability Reporting Standards (ESRS) which provide a standardized framework for companies to disclose their environmental, social and governance (ESG) performance, fostering comparability across industries.

Over the years, we have taken significant steps to enhance our sustainability governance, risk management, and stakeholder engagement. Through structured data collection and improved reporting methodologies, we are embedding sustainability deeper into our business strategy.

A core component of our reporting is the Double Materiality Assessment (DMA), which enables us to evaluate sustainability impacts, risks and opportunities (IROs) across our operations and value chain. By identifying material ESG topics, we can focus our resources towards those areas, mitigate risks, enhance resilience, and capitalize on opportunities that drive sustainable business growth.

**[For more information on Double Materiality refer to sections IRO-1, IRO-2 and SBM-3 of this statement]*

[The English version of the Sustainability Statement is a true translation of the Greek version; however, it has not been separately certified by an independent assurance provider]



Address by the Chairman, *Costakis Loizou*

Dear Valued Stakeholders,

In 2025, Louis PLC continued to advance its commitment to sustainable tourism, responsible business conduct and operational resilience. Building on the progress achieved in previous years, the Group remained focused on strengthening governance, enhancing transparency and integrating sustainability considerations across its strategic and operational decision-making.

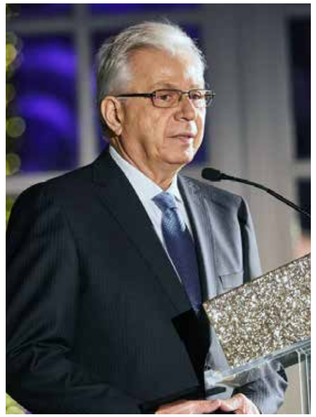
Amid ongoing geopolitical, economic and regulatory developments, the Group demonstrated adaptability and continuity in its operations. Targeted investments were undertaken to maintain and enhance the quality and resilience of the Group's hospitality portfolio, including renovations and capacity enhancements at selected properties in Cyprus and the expansion of operations in Greece. These investments were guided by long-term considerations relating to asset performance, operational efficiency and alignment with evolving sustainability and regulatory requirements.

In 2024, we made substantial progress in aligning our operations with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), laying the groundwork for 2025 as our first reporting year under the new regulation transposed into Cypriot law. This framework supports enhanced transparency, consistency and accountability in sustainability reporting and underpins the Group approach to managing environmental, social and governance (ESG) matters.

Recognising the growing expectations of investors, guests, employees and regulatory authorities for enhanced environmental and social accountability, sustainability is integrated as a key driver of the Group's corporate strategy. The Group's approach to responsible business conduct is grounded in measurable outcomes and robust governance, supporting compliance with evolving regulatory and industry requirements.

In 2025, emphasis was placed on responsible resource management, environmental impact reduction and social initiatives across operations. Actions implemented during the year included continued efforts to reduce energy consumption and waste, increased use of local sourcing, the expansion of infrastructure supporting lower-emission mobility and employee-led community initiatives in the destinations where the Group operates..

Looking ahead, Louis PLC remains focused on further integrating sustainability into its corporate strategy, strengthening stakeholder engagement, and enhancing its capacity to identify, assess, and manage material environmental and social risks and opportunities. Through continued investment, governance refinement, and collaboration across the value chain, the Group aims to support the long-term resilience of its business within the



destinations in which it operates as well as the affected communities.

On behalf of Louis PLC, I extend my sincere gratitude to our employees, partners and stakeholders for their unwavering trust and support.
Together, we will continue shaping a more sustainable, resilient and responsible future for the tourism industry.

Costakis Loizou
Chairman
Louis PLC

GROUP'S KEY HIGHLIGHTS

- Almost 90 years of experience in the tourism sector
- 30 awards received in 2025
- 26 Hotels and Villas in Cyprus and Greece
- >1,700 personnel
- 0 incidents of corruption
- 100% of product procurement budget spent on local suppliers

Our History

Louis PLC has been a key player in the Mediterranean tourism industry since its establishment in Nicosia in 1998. On April 2, 1999, the Company's Board of Directors took the strategic decision to transform Louis PLC into a listed entity. By August 1999, Louis PLC was successfully listed on the Cyprus Stock Exchange, setting the foundation for its future growth and success.

Louis Hotels

Louis Hotels, a pioneer in the hotel industry in Cyprus and Greece, traces its roots back to the early 1940s as part of the Louis Group. Founded by the late Louis Loizou—widely regarded as the "father of tourism" in Cyprus—Louis Hotels laid the groundwork for modern tourism in the region. The journey began with the acquisition of the "Semmering" Hotel in the Troodos mountains, followed by the "Grand Hotel" in Platres and the iconic Louis Hotel on Ledra Street in Nicosia. By 1969, Louis Hotels had acquired the Ledra Palace Hotel, a landmark in the capital.

In the following decades, the Group expanded its portfolio to include numerous properties across Cyprus and Greece, developing a strong reputation for high-quality hospitality and exceptional guest experiences. Major acquisitions included hotels in Chania, Corfu, Zakynthos, Mykonos, and Rhodes.



In 2025, Louis Hotels operated a portfolio of 26 four- and five-star hotel and villa units in Cyprus and the Greek islands, combining a rich heritage with modern innovation.

With a legacy of nearly 90 years and an eye on the future, Louis Hotels remains committed to sustainable growth, continuous improvement, and creating memorable guest experiences. By combining tradition with innovation, Louis Hotels continues to shape the tourism landscape in Cyprus and Greece, enhancing the region's appeal as a top-tier holiday destination.

01

Our VISION

Our vision is to further establish the Louis Group as a leading tourism organization in the Southeast Mediterranean, providing the highest possible service quality to our clients and partners and improve our tourism products and services in the countries where we operate. We aim to strengthen and enrich our strategic alliances with international markets by strengthening our ties with international tour operators in the hotel sector as well as in other areas of the Group's activity.

02

Our PURPOSE

We constantly aim to create happy and memorable holiday memories our guests will cherish for a lifetime.

03

Our VALUES

In order to have happy clients, we must first have happy employees that share our work ethic and values such as being honest, respectful, reliable, humble, kind, authentic, innovative and passionate.

AWARDS AND INITIATIVES

Hotel	Award	By
Hilton	Great Place to Work Green Key	Hilton CYMEPA
Louis Althea Beach	Blue Star Award Food & Drinks Gold	Tui Blue Star
Louis St. Elias Resort	Tripadvisor Travellers' Choice Awards	Tripadvisor
Royal Apollonia	JET2 Quality Awards	Jet2
Louis Paphos Breeze	Tripadvisor Travellers' Choice Awards	Tripadvisor (Top 10 %)
Imperial Island Resort	Tripadvisor Travellers' Choice Awards Booking.com	Tripadvisor Booking.com
Ivi Mare	TUI Global Hotel Awards JET2 Quality Awards JET2 Quality Award Luxe Collection Traveller Review Awards	TUI JET2 JET2 Booking.com
Louis Ledra Beach	Honoured in the Travellers' Choice Awards TUI Global Hotel Awards	Tripadvisor TUI
Louis Nausicaa Beach	List of Top All-Inclusive Hotels in Europe TUI Global Hotel Awards	Tripadvisor TUI
Louis Phaethon Beach	List of Top All-Inclusive Hotels in Europe (BEST OF THE BEST)	Tripadvisor
Cali Resort & Spa	Tripadvisor Travellers' Choice Awards Cyprus tourism awards - Bronze	Tripadvisor Boussias

AWARDS AND INITIATIVES

Hotel	Award	By
Asterion Suites & Spa	Tripadvisor Travellers' Choice Awards TOP 10%	Tripadvisor
Once in Mykonos	List of Best Family-Friendly Hotels in the World Traveller Review Awards	Tripadvisor Booking.com
Kerkyra Blue Hotel N' Spa	TUI Global Hotel Awards Tripadvisor Travellers' Choice Awards Recommended in HolidayCheck.de	TUI Tripadvisor HolidayCheck.de
Infinity Blu	TUI Global Hotel Awards	TUI
King Jason Paphos	TUI Top 100 Hotels	TUI
King Jason Protaras	TUI Top 100 Hotels	TUI
Sofianna Resort & Spa	Traveller Review Awards	Booking.com
King Jason Zante	Traveller Review Awards	Booking.com

CERTIFICATES

Hotel	Certification Name	By
Hilton	ISO9001 ISO45001 ISO22000	
Louis Althea Beach	ISO14001 ISO9001 ISO45001 ISO22000 Travel Life Certification Emas	 Travel Life Κ.Π.Ε
Althea Kalamies Luxury Villas	ISO14001 ISO9001 ISO45001 ISO22000	
Louis St. Elias Resort	CSTI	Cyprus Sustainable Tourism Initiative
Royal Apollonia	ISO9001 ISO22000 Travel life Certification	 Travel Gold Life
Louis Paphos Breeze	Travelife Certification	Travelife
Imperial Island Resort	ISO9001 ISO22000 Travelife Certification Green Key Cyprus Marine Environment Association	 Travelife Cymepa CYMEPA
Ivi Mare	Green Key	Cymepa

CERTIFICATES

Hotel	Certification Name	By
Louis Ledra Beach	ISO9001 ISO22000 Travel life Certification Cyprus Marine Environment Association	 Travelife Gold CYMEPA
Louis Nausicaa Beach	ISO14001 ISO9001 ISO45001 ISO22000 Travel life Certification Green Key	 Travelife Gold CYMEPA
Louis Phaethon Beach	ISO14001 ISO9001 ISO45001 ISO22000 Travel life Certification CSTI	 Travelife Gold Cyprus Sustainable Tourism Initiative
Asterion Suites & Spa	ISO22000	
Once in Mykonos	ISO22000	
Mykonos Theoxenia	ISO22000	
Valmar (Ionian Sun)	ISO22000	
Kerkyra Blue Hotel N' Spa	Travel life Certification	Travel Gold Life

ESRS2 - General Disclosures

The General Disclosures section presents the foundation of Louis PLC's ESG reporting framework, aligned with the principles of the ESRS. This section provides insights into the basis of preparation, governance, strategy and IRO management.

BP-1
Basis for preparation

This Sustainability Statement has been prepared in accordance with the ESRS. It provides a consolidated view of Louis PLC's Environmental, Social and Governance (ESG) impacts, risks and opportunities, covering own operations, upstream and downstream activities within the Group's value chain.

The statement is prepared following the financial consolidation of Louis PLC and includes disclosures for all active subsidiaries, with exceptions outlined below (please refer to Table 1 Note 1). The information presented in this statement is based on all the operations of Louis PLC for 2025.

This statement applies the double materiality principle, evaluating sutainability matters from the impact perspective, the financial perspective or both.

Louis PLC has previously reported sustainability data with reference to the GRI Standards and in alignment with the UN Sustainable Development Goals (SDGs). The transition to ESRS ensures a more comprehensive and structured approach to sustainability disclosures.

The hotels, villas, restaurants and head offices as per Table 1 below are listed under the Group, however, please note the following:

Table 1 – Scope of Statement

CYPRUS

1	Louis Paphos Breeze, Paphos	8	St. Elias Resort, Protaras
2	Louis Phaethon Beach, Paphos	9	Althea Kalamies Luxury Villas, Protaras
3.	Louis Imperial Beach, Paphos	10.	Louis Althea Beach, Protaras
4	Louis Ledra Beach, Paphos	11	Nausicaa Beach, Protaras
5	Ivi Mare, Paphos	12	Cali Resort and Spa, Paphos
6.	Polis 1907, Polis Chrysochous & Akakiko Polis	13.	Hilton Nicosia
7	Royal Apollonia, Limassol		

GREECE

1	Asterion Suites & Spa, Chania	4	Valmar (Louis Ionian Sun), Corfu
2	Mykonos Theoxenia	5	Kerkyra Blue Hotel N' Spa, Corfu
3.	Once in Mykonos		

Restaurants and Head Offices

1	Akakiko and Elliniko, Nicosia (Hilton)	4	Louis PLC Head Office, Nicosia
2	Akakiko2Go Mall of Nicosia	5	Head Office Greece, Athens
3	Louis Hotels Head Office, Nicosia		

Note 1:
Sofianna Resort, Nausicaa Beach Luxury Villas, Chris Le Mare Luxury Villa and Chris Le Mare Gold Luxury Villa, Lora Pearl Villa, King Jason Protaras, King Jason Paphos, Amada Colossos Resort, King Jason Zante, Louis Infinity Blu are not included in the data collection, as the terms of their management contracts differ.

Note2: *Sustainability disclosures include information from active subsidiaries of Louis PLC's group of companies. Calypso Navigation Ltd, Core Marine Ltd, Elona Maritime Co Ltd, Iona Maritime Co Ltd, Ionian Cruise Lines S.A., Lauper Shipping Co Ltd, Louis Cruise Holding Ltd, Louis Hellenic Cruises Ltd, New Wave Navigation S.A., Perla Navigation Ltd, Teal Shipping S.A., Bryden Trading Ltd, Rosebay Shipholding SA, Rachelle Investments Corp , Nictus Holdings Ltd, Leisureland Hotel Enterprises Ltd, Trevora Holdings Ltd, Harmakia Development Ltd and Clairnet Enterprises Ltd have been dormant during the reporting period covered under the disclosure of sustainability information and as such, sustainability-related information is not reflected in this statement for the aforementioned companies. The lack of sustainability data for these dormant subsidiaries is not indicative of a disregard for environmental, social or governance considerations rather, it is a result of their inactivity during the reporting period. We remain committed to transparency and will provide updates if there are any changes in the status of these subsidiaries in future reporting periods.*

The Sustainability Statement encompasses Louis PLC's own operations, upstream and downstream value chain. Value chain actors have been considered in the identification and assessment of the impacts, risks and opportunities [Refer to SBM-3]. Within our disclosures we address the relationship with the general environment, End-users, affected community as well as suppliers. For more details, refer to the individual sections of this statement.

We have not excluded any disclosures due to ongoing negotiations or withheld any information for intellectual property reasons.

BP-2 - Disclosures in relation to specific circumstances

Time Horizons

The following time horizons are applied in Louis PLC's sustainability statement as per the definitions of ESRS:

- **Short-term: the reporting period**
- **Medium-term: from the end of the short-term reporting period and up to 5 years**
- **Long-term: more than 5 years**

Value chain estimation

No value chain data was estimated using indirect sources.

Sources of estimation and outcome uncertainty

Louis PLC strives to ensure the accuracy and reliability of its data by utilizing primary measurement sources where possible.

Any sources of measurement uncertainty, assumptions, or estimates are outlined in the accounting principles for the relevant metric or information. These include waste measurements which also influence Scope 3 GHG emission calculations. Additionally, due to the seasonality of the industry within which the Group operates, a specific approach has been used for the calculation of employees in total workforce, described in the relevant section.

[For more information on workforce demographics, refer to section S1-6 of this statement]

Waste metrics carry a high degree of measurement uncertainty due to lack of measurements provided through invoices or due to data collection limitations. Currently, waste recording at all sites is not practicable due to the cost and effort required. As such, certain sustainability metrics such as waste, rely on well-founded estimates where direct data is unavailable. Where application of the methodology was inappropriate due to the type of establishment (i.e. Head offices and specific restaurants) and gathering of such information was impracticable, this was omitted.

[For more information on waste data measurement uncertainty, refer to section E5-5 of this statement]

Indirect data has been used for the calculation of GHG Scope 1, 2 and 3 emissions, such as emission factors. Various emission and electricity calculations are based on available data sources or methodological standards, such as the GHG Protocol, DEFRA, available industry sources such as the Electricity Authority of Cyprus, the Public Power Corporation of Greece, etc.
[For more information on energy and emission data, refer to section E1-5 and E1-6 of this statement]

Changes in preparation or presentation of sustainability information

There were no changes to the presentation of sustainability data.

There was a change in the preparation of waste metrics, where the methodology was adjusted to provide more consistent approach to the estimation of data, where primary data was unavailable. Disclosure of comparative figures on waste is not practicable.

Additionally, the Group's Scope 3 emission inventory has been significantly enhanced to include material Scope 3 categories, as such comparative figures are not available.

EU Taxonomy disclosures are presented in the environmental section of this statement.

Incorporation by reference

No incorporations by reference are made throughout this statement.

GOV-1 - The role of the administrative, management and supervisory bodies

Sustainability Governance

Governance Structure

Louis PLC operates under a centralized governance framework, ensuring transparency, accountability and effective decision-making across its operations.

The Group follows corporate governance best practices, integrating Environmental, Social and Governance (ESG) considerations into its business strategy and operations.

The responsibilities of individuals from the administrative, management and supervisory bodies, with regards to the material impacts, risks and opportunities are reflected in each separate policy or procedures and actions in place addressing these issues, and as described in the relevant topic sections. Through extensive training the above individuals have acquired the appropriate skill to oversee sustainability matters especially in relation to the material topics. Where necessary, the expertise ofexternal bodies is sought, either for training or guidance.

Management responsibilities

Board of Directors

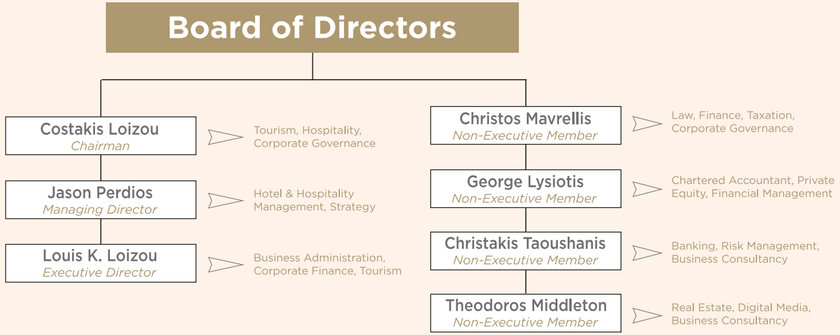
The Board of Directors of Louis PLC is responsible for the strategic oversight, governance, and long-term value creation for the Group's stakeholders. It consists of 7 members, including: **• 2 executive members • 3 independent non-executive members • 2 non-independent non-executive members**

Currently, 43% of Board members are independent, ensuring strong governance oversight and the board's gender diversity ratio for 2024 was 100% male.

The Board supervises and supports the Executive Management to ensure alignment with the Group's business objectives and sustainability strategy. Employees and other workers are not represented in the Board of Directors.

Board Composition & Expertise

The Board members bring extensive experience in the tourism, hospitality, finance, legal, and investment sectors, covering Cyprus, Greece, and international markets. Their expertise includes corporate governance, financial management, ustainability, and regulatory compliance.



Board Committees

The board oversees the management of the Group's material sustainability-related impacts, risks and opportunities (IROs) through the specialized committees. All final ESG related decisions on actions and investments for the mitigation of impacts, reduction of risks and exploration of opportunities, are approved by the Board Sustainability committee so that they may be integrated with other internal functions. All committees have at least 3 Board members. **The Audit Committee**, oversees financial reporting, non-financial reporting and internal controls, ensuring compliance with governance standards. The **Nomination Committee** evaluates the composition of the Board and Executive Management and focus on matters including sustainability competencies.

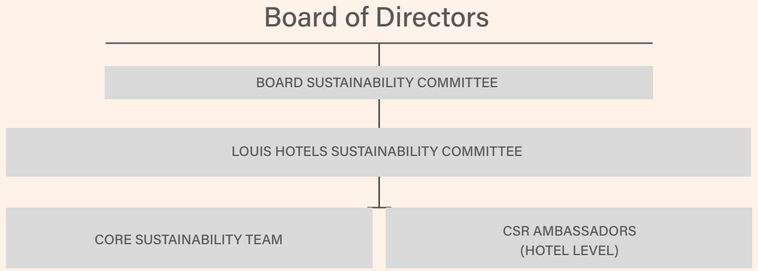
Executive Management

Executive Management, consisting of the 2 executive members of the Board, is responsible for executing the Group's strategic direction and ensuring compliance with corporate policies, legal requirements, and sustainability commitments. It oversees financial and non-financial reporting, manages ESG initiatives across subsidiaries, and regularly updates the Board on sustainability performance. Meetings with the Board and its committees ensure alignment between corporate governance and operational strategy.

Sustainability Governance

Louis PLC has set up a multi-tiered sustainability governance structure:

- **Board Sustainability Committee:** Oversees and advises on ESG policies, risk management, and sustainability strategy.
- **Louis Hotels Sustainability Committee:** Composed of the Group's C-suite executives, responsible for overseeing the implementation of sustainability initiatives across the hotel portfolio.
- **Core Sustainability Team:** Based at Louis Hotels Headquarters, this team includes representatives from various departments to ensure sustainability is embedded in all operational areas.
- **Sustainability Representatives at Hotel Units:** Each hotel appoints dedicated sustainability representatives who implement tailored action plans based on local market needs and report on ESG performance to headquarters.



GOV-2

Sustainability Matters Addressed by the undertaking's administrative, management and supervisory bodies

The Board of Directors and executive leadership (C-suite) at Louis PLC are committed to integrating sustainability into governance, strategy and risk management. The Group ensures that material impacts, risks and opportunities (IROs) related to sustainability are effectively overseen by the administrative, management and supervisory bodies through structured governance mechanisms.

Board Oversight and Reporting

The Board is informed annually about material impacts, risks and opportunities (IROs), due diligence implementation and the effectiveness of sustainability policies through the Group's Sustainability Statement. This includes key performance indicators (KPI's) aligned with regulatory requirements and international reporting standards.

Sustainability in Strategy and Decision-Making

Sustainability is integrated into our business strategy, guiding major transactions and risk management processes. The Board of Directors conducts annual reviews of key ESG risks and opportunities, assessing their impact on financial performance and long-term resilience. This ensures that sustainability remains a priority in our long-term planning.

The Sustainability Committee is involved in all sustainability related issues throughout the year and sets and recommends targets focused on material topics including carbon reduction, resource efficiency, and social responsibility. When evaluating major transactions, the Board uses sustainability due diligence to understand the material impacts, risks and opportunities associated with the decision. This process assesses environmental and social impacts, regulatory compliance, and whether the transaction aligns with the Group's ESG strategy, thereby ensuring that IROs directly inform strategic decision-making.

Board Expertise and Performance Monitoring

The Board receives regular updates on ESG regulations, investor expectations and sustainability trends through briefings and internal memos. The Sustainability Committee monitors performance against sustainability targets, ensuring compliance and continuous improvement. Where the appropriate expertise and skills to tackle specific sustainability issues, is not available internally, we seek external expertise on ESG issues, specifically in understanding and addressing our material impacts, risks and opportunities. Following the double materiality assessment process for the purposes of voluntary ESRS reporting in 2024, external expertise was sought to provide suggestions and guidance in order to improve the Group's performance in relation to material issues.

GOV-3
Incentive Schemes

Louis PLC does not currently have incentive schemes or remuneration policies linked to sustainability matters for members of its administrative, management or supervisory bodies.

Members of the Board and Executive Management are not assessed based on performance against sustainability-related targets or impacts, nor are sustainability performance metrics included in remuneration policies as performance benchmarks.

As a result, there are no incentive schemes or variable remuneration dependent on sustainability-related performance or on climate-related considerations such as GHG emission reduction targets. Louis PLC continuously evaluates its governance structures and may consider integrating sustainability-related incentives into future remuneration frameworks.

GOV-4
Due Diligence

Core Elements of Due Diligence	Sections in the Sustainability Statement
Embedding due diligence in governance, strategy, and business model	GOV-1 GOV-2 G1-1 SBM-1 SBM-2
Engaging with affected stakeholders in all key steps of the due diligence process	SBM-2 S3-2 S4-2
Identifying and assessing adverse impacts	SBM-3 IRO-1 IRO-2
Taking actions to address those adverse impacts	GOV-2 GOV-5 E1-1 & E1-3 E3-2 E4-3 E5-2 S1-4 S3-4 S4-4 G1-3 G1-4
Tracking the effectiveness of these efforts and communicating progress	GOV-5 E1-4 E3-3 E4-4 S1-5 S3-5 S4-5 G1-4

GOV-5

Risk Management

The Board of Directors has the overall responsibility for the adoption and oversight of the Group's risk management framework. The Group's Risk Management Policies are designed to identify and analyse the risks faced by the Group, to set appropriate risk limits and control mechanisms, and to monitor risks and adherence to these limits, with revisions to reflect changes in market conditions and the Group's activities. The outcomes of the risk assessment and related internal control activities are integrated into the Group's established internal processes. While the overall processes and controls put in place are not specifically designed for sustainability reporting, our risk management and internal control systems ensure the same approach to sustainability reporting Findings from these activities, including those relevant to sustainability reporting, are communicated to the Board through the existing risk management oversight structure.

Risks are mainly focused on accuracy and completeness of data, especially in sustainability reporting due to the immaturity of the process. We mitigate these risks through trainings, improvements to our data recording through digital systems, allocation of responsibilities including multiple levels of data review and incorporation of external expertise.

SBM-1

Strategy, Business Model, and Value Chain

Business Overview

Louis PLC is a publicly listed company since 1999. The Group operates as a leading hospitality Group in the Southeastern Mediterranean, focusing on hotel ownership, operation, and management through its subsidiary, Louis Hotels Public Company Ltd. With a diverse portfolio of 4- and 5-star hotels and resorts in Cyprus and Greece, the Group delivers high-quality tourism experiences while continuously enhancing its service offerings, catering to both leisure and business travellers.

Due to the seasonality of the industry within which the Group operates, a headcount throughout the reporting year (2800 employees in total, 700 employees in Greece and 2100 in Cyprus) does not represent the actual number of employees, as this results in variations of headcount throughout the year.



The core business of our Group is Hotel Operations & Management – Owning and managing a growing portfolio of properties, catering to various market segments, including luxury, family-friendly and adults-only resorts.

Through our core business, we incorporate the following as part of our business strategy:

- *Strategic Partnerships – Collaborating with leading international tour operators and franchise agreements with brands such as TUI and Design Hotels to enhance global reach.*
- *Sustainable Development & Investments – Prioritizing renovations, technology upgrades and eco-friendly initiatives to improve guest experience and operational efficiency.*

Breakdown of Total Revenue as per Financial Statements:

Total Revenue: €138.641 million

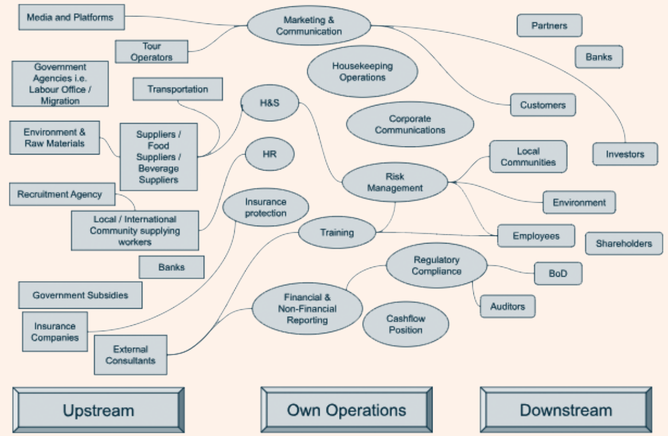
Significant Markets and Customer Groups

Louis PLC mainly serves European tourists, corporate clients and travel operators. The Group's market presence spans coastal resort destinations and urban business hubs in Cyprus and Greece, ensuring a diverse and resilient customer base. In Cyprus, the majority of tourists originate from the UK, Scandinavian countries, Germany, Greece, France, Poland and Israel, while in Greece, a significant portion of visitors comes from Asia and the US. Strategic partnerships with major tour operators and travel agencies drive consistent demand and high occupancy levels.

Business Model and Value Chain

Louis PLC follows a vertically integrated business model, managing owned, leased and franchised hotel properties. The Group's value chain encompasses all activities, resources, hotel operations and relationships involved in the Group's business model along with interactions with the broader external environment. This includes both internal operations and external engagements with suppliers, partners and customers.

Upstream represents entities from where the Group receives goods or services as inputs, while downstream represents entities or individuals receiving goods and services from the Group. Internal operations include its properties, operations and functional departments.



Sustainability-Related Goals and Strategy

Environmental Goals

Louis PLC aims to play an active role in the transition to a sustainable and climate-neutral society by focusing on climate change mitigation and responsible resource management, including water usage and waste reduction.

Social Goals

Louis PLC strives to be an engaging and appealing workplace for all employees, regardless of seasonality. As the Group's most valued stakeholders, employees and customers are a top priority. Therefore, ensuring their health, safety, and information security remains a key focus area. This is achieved through training, education and established procedures.

Governance Goals

Louis PLC regards good business conduct as the cornerstone of a credible, trustworthy, and well-managed Group. By acting responsibly and with integrity, in accordance with our Code of Business Conduct and Ethics, we foster long-term relationships with business partners and affected communities, while reinforcing the foundation for a sustainable and successful business.

Our customers are central to our efforts to improve our performance, especially in relation to the consumption of raw materials, whether that entails food waste, electricity consumption or water consumption. Similarly, our business partners' trust and cooperation allow us to maintain our strong corporate culture.

[Please refer to Policies, Actions and Targets under each material topic for more information on sustainability related goals.]

SBM-2

Interests and Views of Stakeholders

Stakeholder engagement is an essential and continuous process that directly shapes Louis PLC's ESG priorities and strategic decisions. By fostering open dialogue with both internal and external stakeholders, the Group's business model and strategy, are constantly evolving to increase transparency, accountability and alignment with stakeholder expectations.

Stakeholders include individuals or entities significantly affected by Louis PLC's operations and those with the capacity to influence the Group's strategic direction. Engagement is conducted through structured and ad hoc interactions, enabling the identification of material sustainability topics and their integration into corporate strategy.

Regular dialogue provides the Group with the tools to understand and respond to stakeholders' needs and expectations, to improve the products and services offered, while responding to the needs and expectations of the society in which the Group operates.

Administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders through a variety of mechanisms, such as through the whistle-blower channels, other forms of complaints, reviews, etc. The form of communication with the different stakeholders is described below:

Key Stakeholders

Stakeholder Group	Main areas of interest and expectations	Form of Communication
Employees	• Health and Safety • Employee motivation and engagement • Employee Performance • Talent attraction and retention • Training/ Education • Human Rights/Diversity • Equal Opportunities • Operational effectiveness • Equal opportunity • Personal Data Protection	• Internal employee meetings • Workshops/Seminars/ Trainings • Employee surveys • Private meetings • Announcements • Intranet
Shareholders and investors	• Health & Safety • Strategy and investments • Financial performance • Corporate governance • Compliance • Operational effectiveness • Employee Performance • Personal Data Protection • Social contribution • Transparency/Anti-Corruption/Money laundering	• Annual & Interim Reports • Annual General Meetings • Extraordinary General Meetings • Announcements • IR Website
Customers	• Health and safety • Quality and satisfaction • Personal Data Protection • Responsible marketing • Passenger rights	• Customer relationship management (CRM) systems • Customer satisfaction surveys • Audits from Travel Auditors • Social Media Network • Newsletters • Mobile app
Tour Operators & Travel Agents	• Health and safety • Customer service, quality and satisfaction • Personal Data Protection • Responsible Marketing • Environmental Management • Financial performance • Social contribution • Passenger rights	• Customer satisfaction surveys • Complaints management • Terms of Agreements • Media and social media • Advertisements •Audits • Newsletters
Affected Communities	• Health and Safety • Responsible Marketing • Personal data protection • Environmental performance • Social contribution	• Meetings with local bodies • Media • Social Media Network
Suppliers	• Transparency • Social contribution • Responsible procurement / Supply Chain Management	• Meetings • Terms of Agreements
Government	• Health and Safety • Compliance • Passenger rights • Transparency • Anti-corruptions / Money Laundering • Personal Data Protection	• Legislation • Public Consultations
Collaboration with market services	• Health and Safety • Customer service, quality and satisfaction • Local products	• Meetings • Terms of Agreements

Through this regular and open dialogue with different stakeholder groups, internal stakeholders and proxies who are members of the core sustainability team, are more equipped to identify and assess impacts, risks and opportunities that are associated with the Group.

To strengthen this process, Louis PLC conducted a Stakeholder Engagement Survey aligned with the ESRS sustainable matters. The survey results informed the DMA, providing valuable insights into stakeholder priorities related to the Group's environmental and social impacts, as well as associated financial risks and opportunities.

With the completion of the DMA, a sustainability strategy was introduced. Following any future revisions to our DMA the necessary amendments will be made to our strategy however there is no current plan for any such amendments. Open communication with our stakeholders is however encouraged, therefore, should any concerns be raised or feedback provided that requires amendments to our sustainability strategy, this will be incorporated accordingly to refine our sustainability strategy, enhance risk management practices and improve our overall ESG performance.

SBM-3, IRO-1 & IRO-2

A materiality assessment as per ESRS Implementation Guidance was conducted in 2024. Following the voluntary adoption of ESRS for reporting year 2024, Louis PLC carried out a refresh to the DMA for 2025 reporting, incorporating additional benchmarking with the use of published 2024 ESRS reports within the hospitality industry. Additionally, the Group reviewed the Impacts, Risks and Opportunities previously identified, taking the most recent risk assessment into consideration. The material topics remain unchanged from the previous materiality assessment. The assessment will be repeated if or when a significant change occurs or following a significant event that might affect the Group's operations or its external environment.

Currently, the IRO identification and assessment process is not integrated into the overall risk management, nor the overall management process. No resilience assessment of the strategy or business model has been conducted.

Understanding the value chain

The initial step in identifying and evaluating impacts, risks and opportunities relevant to Louis PLC, involved mapping and understanding the business model and value chain. This included a comprehensive analysis of its operations in hotel management, supply chain, and customer interactions, establishing a clear assessment scope.

According to ESRS terms, Value Chain ("VC") is defined as the full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. It is also recognised that although used in the singular, an undertaking can have multiple value chains, as is the case for Louis PLC.

Value chain mapping was conducted by the Group's cross-functional core Sustainability team, which includes professionals within the Group from a number of departments with extensive experience, with the results being verified by top management.

Identifying Impacts, Risks and Opportunities

With the whole value chain in mind, Impacts, Risks and Opportunities (IROs) were identified across the list of sustainability matters covered in the topical ESRS, including topics, sub-topics and sub-sub-topics. In addition to the existing internal information and insight, a number of sources were used in the identification process, to understand related industry issues based on research, peer benchmarking, national, EU and international regulation, as well as other standards (SASB and GRI). Consideration was also given to the geographical locations of all own operations, the Group risk registry, current issues such as conflicts and wars, as well as the Group business relationships, especially with suppliers, the affected community and the general environment. Internal proxies relevant to groups of external stakeholders, i.e. HR, insurance, H&S, marketing, communications, procurement, quality and finance, as they were assumed to be the best representatives for these stakeholders were involved in the identification of the impacts, risks and opportunities. Once the final list of IROs was created a validation exercise was carried out by the internal proxies, to verify or amend the list.

Assessing Impacts, Risks and Opportunities

Considering the EU regulatory developments and requirements, by the CSRD, the ESRS and the current implementation guidelines provided by EFRAG, applied on a voluntary basis, the introduction of the double materiality perspective gives rise to two separate components:

-Impact Materiality:

A sustainability matter is material from an impact perspective when it pertains to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short-, medium- or long-term. Impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. Business relationships include those in the Group's upstream and downstream value chain and are not limited to direct contractual relationships.

- Financial Materiality:

A sustainability matter is material from a financial perspective if it generates risks or opportunities that affect (or could reasonably be expected to affect) the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term.

Impact materiality

Impact materiality analysis consists of assessing the potential and actual positive or negative impacts generated by Louis PLC on the environment and the people, over the short, medium and long term. In particular, impacts were assessed on the basis of the following criteria:

-For actual or potential positive or negative impacts:

• Severity:

-Scale: how grave the negative impact is or could be or how beneficial the positive impact is on people or the environment.

-Scope: how widespread the negative or positive impacts are. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected.

-Irremediable character: whether and to what extent the negative impacts could be remediated, i.e., restoring the environment or affected people to their prior state.

•Likelihood: how likely is the impact in the case of potential impacts

While severity and likelihood have equal weighting, in the case of **potential negative human rights impacts**, severity take precedence over likelihood, as specified in ESRS 1, paragraph 45. The impact statements were assessed, based on the above criteria and the following scoring framework:

Scoring Framework for Impact Materiality			
Severity (a total of scale and scope for positive impacts out of 12. A total of scale, scope and irremediability for negative impacts – out of 18)			
Scale (1-6)	Score (1-6)	Irremediability (1-6)	Likelihood (1-6) only for potential impacts
1 - not at all	1 - not at all	1 - very easy to remediate	1 - none
2 - a little	2 - limited	2 - relatively easy to remediate	2 - very low/minimal
3 - low	3 - concentraded	3 - remediable with effort	3 - low
4 - medium	4 - medium	4 - difficult to remediate	4 - medium
5 - high	5 - widespread	5 - very difficult to remediate	5 - highly likely
6 - great	6 - total / global	6 - irremediable	6 - absolute likelihood/actual

Materiality was calculated based on the scoring system translated into percentages for severity and likelihood and a threshold of 65% was applied for Impact Materiality.

- Financial Materiality:

Financial materiality analysis consists of assessing the risks and opportunities that arise for Louis PLC from the environment, the people and the economy, as well as the risks and opportunities that arise from impacts and dependencies. An outside-in approach to assess how the external environment affects or could affect the financial situation of the Group in the short, medium and long term, without consideration of any existing measures to mitigate risks. Financial impacts (risks and opportunities) were assessed based on the following criteria:

- For risks and opportunities:

• Likelihood: how likely is it that a risk or opportunity can occur
• Magnitude: what is the size of impact this risk or opportunity can have on the Group.

The risks and opportunities assessed, based on the above criteria and the following scoring framework:

Scoring Framework for Impact Materiality

Magnitude (1-6)	Likelihood (1-6)
1 - none	1 - none
2 - very small/minimal	2 - very low/minimal
3 - small	3 - low
4 - medium	4 - medium
5 - large	5 - highly likely
6 - great	6 - absolute likelihood/actual

Magnitude ranges were assigned to the scoring system for a consistent approach to all risks and opportunities.

Materiality was calculated based on the scoring system translated into percentages for magnitude and likelihood and a threshold of 65% was applied for Financial Materiality.

Stakeholder Engagement

To aid the process of the materiality assessment, the Group conducted further engagement with internal and external stakeholders, to gather insights from key stakeholders, to understand their priorities regarding sustainability issues.

Stakeholder groups (Office Staff, Hotel Staff, Senior Management, Board Members, Shareholders, Guests, Tour operators/Travel Agents, Suppliers, Partners, NGO's(Non-Governmental Organisations), Affected Community) were asked to rank the topics provided, which were based on the ESRS sustainability topics, in order of priority, in terms of the impact Louis PLC has on them through its activities and operations, as well as the priority in terms of the perceived financial impact the provided topics can have on Louis PLC's activities and operations.

The stakeholder groups received an equal weighting, and their final ranking provided weighting for each topic, that was added to the percentage of the initial assessment on the list of IROs, from both an impact and financial materiality perspective.

Assumptions

In light of the requirements of the ESRS, some assessments necessary for the identification and evaluation of certain impacts, risks and opportunities were unavailable. As such, reliance on internal expert knowledge was necessary. In reference to environmental impacts on topics such as biodiversity where environmental impact assessments were unavailable to inform the assessment of severity, the assessment was based on the opinions of internal stakeholders most related to the particular topic.

Additionally, value chain related impacts, risks and opportunities were considered through the use of internal proxies.

Validation and Approval

Cross-functional workshops with sustainability, finance, operations and governance teams validated the results. The Board of Directors and Executive Management reviewed and approved the final list of material Impacts, Risks and Opportunities, as well as the previous Sustainability Statement (2024).

The Double Materiality Assessment resulted in the identification of key sustainability topics across environmental, social and governance (ESG) areas:



Type	Sustainability Matter	IRO	Description	Position in the Value Chain	Time Horizon
Actual Negative Impacts	E1 Climate Change	GHG Emissions	Direct and indirect emissions from energy use and business operations, have a negative impact by contributing to climate change.	UO*	L**
		Electricity Consumption	Energy consumption by staff and guests within hotel operations negatively impacts the environment by driving higher energy usage and associated greenhouse gas emissions.	O*	SML**
	E3 Water and Marine Resources	Water Consumption	Given that our establishments are located in the Mediterranean region, a high water-risk area, our operations contribute significantly to water consumption, leading to a negative environmental impact, emphasizing the need for efficient resource management.	O*	SML**
	E5 Circular Economy	Solid Waste	Actual generation of general waste, plastic, paper and glass waste, from all Group operations.	O*	ML**
		Food Waste	Food waste generated from hotel restaurants and breakfast buffets.	O*	SM**
Potential Negative Impacts	E4 Biodiversity & Ecosystems	Habitat destruction & fragmentation	Beach facilities like sunbeds, umbrellas and beach sports, resulting in habitat destruction, disturbance of migration patterns, and the loss of native flora and fauna.	OD*	ML**
	S4 Consumers and End-users	Guest Safety in case of accidents	Physical harm or medical emergencies due to accidents including slip and fall, poor equipment and facility maintenance	O*	S**

Type	Sustainability Matter	IRO	Description	Position in the Value Chain	Time Horizon
Actual Positive Impacts	S3 Affected Communities	Supporting Local Communitives	Through job creation within hotel operations as well as within the local communities benefiting through tourism, sponsorships i.e. Polis Hospital, in-kind and monetary donations, and by supporting local suppliers with the majority of procurement coming from Greece and Cyprus	O*	SM**
Risks	S1 Own Workforce	Occupational H&S	Without appropriate training and precautions or adequate insurance coverage, occupational H&S incidents can pose a financial risk to the Group due to insurance and legal repercussions	O*	S**
		Seasonality of staff	New recruits every year can lead to loss of expertise, while there is a constant need for new staff training	O*	SM**
		Collective bargaining agreements and freedom of association	Allows staff to have a major impact on Group operations through protests	O*	SM**
		Staff shortage and recruitment issues due to geopolitical risk	Geopolitical risks have Limited the availability of staff from nearby countries, leading to staff shortages and recruitment issues	U*	M**
		Cyber security / Cyber-attacks	Loss of information risking the cyber-safety of employees, can lead to potential legal action with financial and reputational consequences	O*	SM**
		CDRR	Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences	O*	SM**
	S4 Consumers and End-users	Cyber security / Cyber-attacks	Loss of information risking the cyber-safety of customers, can lead to potential legal action with financial and reputational consequences	UDO*	SM**

Type	Sustainability Matter	IRO	Description	Position in the Value Chain	Time Horizon
		GDPR	Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences	UDO*	SM**
	G1 Business Conduct	Lack of strong corporate governance	Governance can allow a Group to be vulnerable and exposed to a variety of issues, leading to legal repercussions and reputational risk	O*	M**
		Corruption	Lack of procedures and policies in place could lead to corruption and bribery challenges	O*	M**
Opportunities	E1 Climate Change	Reducing Fossil Fuel Consumption	Implementation of renewable energy sources and energy-saving practices, such as automatically turning off power in unoccupied hotel rooms, can reduce costs and enhance the group's reputation for environmental responsibility	O*	S**
	E5 Circular Economy	Food Waste Analysis	Conducting food waste analysis will help identify inefficiencies, improve purchasing decisions and promote environmental responsibility within our operations	O*	ML**

*O= Own Operations, U = Upstream, D = Downstream **S = Short-term, M = Medium-term, L = Long-term

The current effects of each material impact, risk and opportunity on Louis PLC's business model, the value chain position where the IROs originate from, the time-horizons, strategy and decision-making, including the Group's actions or planned response actions, are presented within the respective topical standards disclosures throughout the Sustainability Statement.

The anticipated financial effects on the Group's financial position, performance and cash flows over the short-, medium and long-term have not yet been quantified at this stage. Current financial effects on expenditure are discussed under each material topic section. Training expenditure is recognised under the operational costs within the financial statements, while all other expenditure amounts relate to Fixed Assets as part of Property, plan and equipment additions within the financial statements.

A description of the individual material IROs is provided under each relevant material topic section.

No additional entity-specific disclosures were considered, beyond the realm of ESRS topic maters.

Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The Double Materiality Assessment resulted in the identification of the ESRS Disclosure requirements that are covered by this statement:

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	E4-3	Actions and resources related to biodiversity and ecosystems	65
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ESRS Topic Mater	DR	Description	Page Number
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	S1-1	Policies related to own workforce	74
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ESRS Topic Mater	DR	Description	Page Number
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	S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunitie	90
S4 – Consumers and End-Users	S4- SBM-2	Interests and views of stakeholders	91
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ENVIRONMENTAL REPORT



Climate Change

E1.IRO-1, GOV-3 & SBM-3

Impacts, Risks, and Opportunities (IROs)

Louis PLC has conducted an assessment of its climate-related environmental impacts, risks and opportunities across its operations and value chain, with material impacts resulting from the generation of greenhouse gas (GHG) emissions and energy consumption across its establishments, based on the internal expertise of the Group's sustainability team, especially through the operations department. These emissions arise from the Group operations, energy use by guests and staff, business travel and other Scope 3 categories across the value chain. The Group has assessed its scope 3 emissions and reports on its material emission based on data availability and relevance.

In response to this process, Louis PLC has identified an opportunity to mitigate its environmental footprint and eventually act as a cost-saving mechanism. The Group is investing in energy-efficient technologies and renewable energy installations, both in new units and existing property renovations. These initiatives are designed to reduce reliance on fossil fuels, lower energy consumption and costs, and enhance the group's reputation for environmental responsibility among customers and stakeholders.

No resilience analysis has been conducted just yet as part of the business model and strategy, in relation to climate change, while the Group plans to incorporate climate scenarios in its development of a new climate related strategy in the future.

While Louis PLC has not yet applied climate-related scenario analysis to assess transition events and exposures, it plans to evaluate its operations to align with the transition to a climate-neutral economy.

Climate-related transition events, such as technological improvements through the investment in new technologies as well as market changes, for example the changing customer behaviour and increased cost of raw materials (based on TCFD classification), have been considered in the identification of climate related opportunities in the short term for the reduction of costs. Additionally, the Group considered climate-related physical risks and hazards, acute and chronic in the long-term (based on Commission delegated regulation (EU) 2021/2139) like extreme weather events and the impact on assets an business activities.

TYPE	IRO	Description	Position in the Value Chain	Time Horizon
Actual Negative Impacts	GHG Emissions	Direct and indirect emissions from energy use and business operations, have a negative impact by contributing to climate change.	UO*	L**
	Electricity Consumption	Energy consumption by staff and guests within hotel operations negatively impacts the environment by driving higher energy usage and associated greenhouse gas emissions.	O*	SML**
Opportunities	Reducing Fossil Fuel Consumption	Implementation of renewable energy sources and energy-saving practices, such as automatically turning off power in unoccupied hotel rooms, can reduce costs and enhance the group's reputation for environmental responsibility.	O*	S**

*O= Own Operations, U = Upstream, D = Downstream. **S = Short-term, M = Medium-term, L = Long-term.

Climate-related considerations are not factored into the renumeration of members of the administrative, management and supervisory bodies.

E1-1 & E1-3

Actions and Transition plan

While Louis PLC's does not currently have a transition plan compatible with limiting global warming to 1.5oC, nor does it currently have plans to develop one yet, the Group has planned actions including a number of modifications and installations to existing establishments in order to reduce energy consumption, GHG emissions as well as reliance on fossil fuels.

The plan is focused on the short term. During 2024, the core sustainability team and the CSR ambassadors (at hotel level) received extensive awareness training on a number of environmental issues, including climate change and energy efficiency. The Group also invested in a decarbonisation project (CapEx - €30k), partly subsidised by a government scheme, guided by frameworks such as the GHG Protocol and ISO 14064, for the identification of decarbonisation levers and the expected emission reductions from the application of the different actions. Negotiations for the implementation of specific actions took place, involving the technical team, purchasing department and potential suppliers, which led to the implementation of the decarbonisation project and the relevant actions detailed below.

Following the results of the first part of the decarbonisation project completed in 2023, the Group allocated around €600k for GHG emission reduction improvements and electricity consumption reduction at a number of our units including the installation of Photovoltaic panels, replacement of inefficient machinery and other energy saving technologies addressing voltage optimisation.

A further investment of about €670k is planned for 2026 for the same purposes, including insulation upgrades to buildings. This amount relates to Fixed Assets as part of Property, plan and equipment additions within the financial statements.

The expected reduction in emissions in the first year of operation of the PV systems is 516t CO2eq. For the period the PVs were in operation in 2025 the reduction was 168t CO2eq.

Additional future initiatives involving pipe insulation, pool covers, solar water heaters, adiabatic cooling panels, variable frequency drive (VFD) installations and energy saving technologies will be discussed further, for potential implementation in the next 10 years.

All plans detailed above are approved by the sustainability committee, top management and Board of Directors.

The expectation is that our locked-in emissions are likely to increase as the Group expands its operations with the addition of new hotel units.

Louis PLC does not fall under the exclusion criteria for the EU Paris-aligned Benchmarks, as outlined in Article 12.1 (d-g) and 12.2 of (EU) 2020/1818.

Further to the above, it is important to note that the Group aims to prioritise investment in actions that will address material issues, such as GHG emissions from own operations and value chain, and will aim to utilise any investment opportunities and subsidy schemes to further enhance our efforts for lowering said emissions.

In addition to the above, Louis PLC invested around €18k for training purposes, in addition to internal environmental training, with the aid of external training consultants, including environmental management and application of Travelife Systems, covering a range of environmental issues, including climate change, water management, circular economy and biodiversity.







E1-2

Policies

Louis PLC is aiming to develop a comprehensive Environmental Policy aimed at addressing its material IROs related to climate change mitigation and energy. Once finalised, the policy will serve as the framework guiding the Group's approach to environmental responsibility and climate-related actions across its operations and value chain. Louis PLC expects to publish the Environmental Policy in due course, ensuring alignment with its broader sustainability objectives and regulatory requirements.

Currently there is no policy and although the Group has carried out materiality assessments in the past, a thorough IRO assessment as prescribed by the ESRS had not been implemented before. As such, the Group takes this opportunity to identify gaps and key focus areas based on material topics to create a comprehensive policy on a variety of topics.

E1-4

Targets

At present, Louis PLC has not established any measurable, outcome-oriented greenhouse gas (GHG) emissions reduction targets and no science-based targets have been adopted to ensure compatibility with the objective of limiting global warming to 1.5°C under the Paris Agreement. Lack of comprehensive research and accurate historic data did not allow for the creation and implementation of targets, however the Group aims to utilise the information provided within this statement and as per ESRS, to make better informed decisions as to the setting of GHG related targets.

The effectiveness of the above-mentioned actions is measured through year-on-year comparisons of energy consumption and GHG.

E1-5

Energy consumption and mix

Energy consumption sources were identified and monitored for all our establishments, including purchased electricity that was used to run our operations. Sources other than purchased electricity include Liquified Petroleum Gas (LPG), biomass pellets, diesel for heating, diesel for Group cars and other equipment, and petrol for Group cars and other equipment. DEFRA conversion factors were used for the calculation of energy consumption. The total energy consumption and breakdown is displayed in Table 1. Figure 2 represents the share of energy consumption by source. Energy intensity is calculated using the Group's net revenue for 2025.

Table 1: Energy Consumption and mix	**2025**
Total fossil energy consumption (MWh)	29.716
Share of fossil sources in total energy consumption (%)	82.6
Consumption from nuclear sources (MWh)	0
Share of consumption from nuclear sources in total energy consumption (%)	0
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	1.053
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	4.932
Consumption of self-generated non-fuel renewable energy	268
Total renewable energy consumption (MWh)	6.253
Share of renewable sources in total energy consumption (%)	17.6
Total energy consumption (MWh)	35.969.3
Energy Intensity	251.04 MWh per million EUR net revenue

Share of energy consumption (%) by source

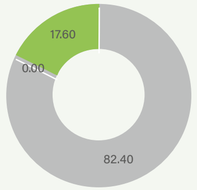


Figure 2: Share of energy consumption from fossil fuels, renewable energy and nuclear

- Share of fossil sources in total energy consumption (%)
- Share of consumption from nuclear sources in total energy consumption (%)
- Share of renewable sources in total energy consumption (%)

E1-6
GHG emissions

GHG emissions calculated and displayed in Table 2, include Scope 1,2 and 3 emissions from all operations that are under the management of Louis PLC as per section BP-1 of this statement.

For future statements, if the definition of what constitutes our Group and its value chain, changes, the baseline will be adjusted.

For the calculations of Scope 1,2 and 3 emissions, the GHG Protocol Corporate standard was used as a general framework which is based on 2006 IPCC Guidelines for National Inventories. Specific emission and conversion factors were used as per national guidelines given by the Environment Department of both Cyprus and Greece, GHG protocol emission factors and DEFRA.

Table 2: GHG Scope 1,2, and 3 Emissions by country and Emission intensity

2025

	Cyprus	Greece	Total
Scoope 1 GHG emissions			
Gross Scope 1 GHG emissions (tCO2eq)	2,917.1	512.2	3,429.7
Scope 1 GHG emissions from regulated emission trading schemes (%)	-	-	-
Scope 2 GHG emissions			
Gross Location based Scope 2 GHG emissions (tCO2eq)	12,574.0	1,011.2	13,585.1
Gross Market based Scope 2 GHG emissions (tCO2eq)	12,922.4	894.6	13,887.0
Significant Scope 3 GHG emissions			
Total Gross indirect (Scope 3) emissions (tCO2eq)	25,260.6	9,461.7	34,722.3
1. Purchased goods and services	19,986.7	3,336.1	23,322.8
2. Capital goods	2,286.2	5,445.4	7,731.6
3. Fuel and Energy related activities not included in Scope 1 or 2	1,813.0	309.9	2,123.0
4. Waste generated in operations	1,024.5	141.7	1,166.2
5. Business travel	150.2	43.4	193.5
Total GHG emissions			
Total GHG emissions (tCO2eq) (location based)			51,736.8
Total GHG emissions (tCO2eq) (market based)			52,038.7
Intensity			
Net Revenue used to calculate GHG intensity (in million EUR)			138,641
Total location-based GHG emissions intensity (tCO2eq per million EUR net revenue)			373.2
Total market-based GHG emissions intensity (tCO2eq per million EUR net revenue			375.3
		tCO2e	
Biogenic emissions from the combustion or biodegradation of biomass			11.1

Scope 1 emissions include emissions resulting from fuel used in our operations and from fluorinated gases from the operation of refrigerators. No Scope 1 GHG emissions fall under regulated trading schemes.

As for Scope 2 emissions, our establishments are located both in Cyprus and Greece, hence emission factors varied per location and electricity provider.

Following an assessment of applicable Scope 3 emission categories, including a hospitality benchmarking exercise utilising 2024 published hospitality industry ESRS reporting as well as the World Sustainable Hospitality Alliance (WSHA)'s Net Zero Methodology for Hotels, five categories were identified, namely Category 1 – Purchased Goods and Services, Category 2 – Capital Goods, Category 3 – Fuel and Energy related activities not included in scope 1 or 2, Category 5 – Waste generated in operations and Category 6 – Business Travel.

Category 1 - Purchased Goods and Services	Calculated using the World Resources Institute Cool Food Pledge Calculator for food and beverage based on weight and location taking into account emissions from the full product cycle (farm to fork). All other Category 1 emissions are calculated using CEDA by Watershed 2025 emission factors for Cyprus and Greece.
Category 2 - Capital Goods	Calculated using DEFRA 2025 conversions based on expenditure.
Category 3 - Fuel and Energy related activities not included in scope 1 or2	Calculated using DEFRA 2025 conversions for well-to-tank and transmission and distribution emissions of the Group's electricity and energy consumption.
Category 5 - Waste generated in operations	Calculated using DEFRA 2025 conversion factors according to waste type, whether it was recycled or not, or whether it has been used for other purposes i.e. cooking oil collected and transformed into biodiesel. Waste estimations are subject to a high level of measurement uncertainty.
Category 6 - Business Travel	Calculated according to km travelled per passenger.

No biogenic emissions of CO2 from the combustion or biodegradation of biomass were included in Scope 1 and 3 of the GHG emissions inventory, as these are reported separately, if applicable. The emission factors applied for Scope 2 calculations do not separate the percentage of biomass or biogenic CO2.

EU Taxonomy of Sustainable Activities Report

Introduction

Background Information

The EU Action Plan on Sustainable Finance aims to redirect capital flows towards sustainable economic activities and support the transition to a climate-neutral economy. As part of this initiative, Regulation (EU) 2020/852 ("EU Taxonomy Regulation"), adopted on 18 June 2020, establishes a common classification system for environmentally sustainable economic activities across the European Union.

The EU Taxonomy defines environmentally sustainable activities based on their contribution to six environmental objectives:
- Climate Change Mitigation
- Climate Change Adaptation
- Sustainable Use and Protection of Water and Marine Resources
- Transition to a Circular Economy
- Pollution Prevention and Control
- Protection and Restoration of Ecosystems and Biodiversity

Under the Corporate Sustainability Reporting Directive (CSRD), companies must disclose the proportion of Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx) that is Taxonomy-Eligible and Taxonomy-Aligned. An activity is considered Taxonomy-Aligned where it substantially contributes to one or more environmental objectives, does not significantly harm the remaining objectives (Do No Significant Harm – DNSH), and complies with Minimum Safeguards requirements.

In 2025, the European Commission introduced amendments through Commission Delegated Regulation (EU) 2026/73 effective from 1 January 2026, establishing a proportionate reporting approach under Article 8. Undertakings assess Taxonomy eligibility and alignment only for activities that are financially material to each KPI (Turnover, CapEx and OpEx) individually.

Activities representing less than 10% of the respective KPI are considered non-material and disclosed in aggregated form without detailed technical screening. Louis Plc has applied the amended disclosure regime for the 2025 financial year, ensuring compliance with the updated regulation and closely following regulatory developments to prepare for future changes.

Step 1: Eligibility Assessment

Economic activities falling within the scope of the EU Taxonomy are identified by assessing their correspondence with the activity descriptions included in the delegated acts, supported by NACE code mapping.

In line with the proportionality provisions described above, only material activities are subject to detailed eligibility assessment, while non-material activities are disclosed in aggregated form.

Step 2: Alignment Assessment

Taxonomy-eligible activities identified in Step 1 are assessed to determine whether they qualify as Taxonomy-Aligned. An activity is considered aligned where it:

1. Substantially contributes to at least one environmental objective by meeting the applicable technical screening criteria;
2. Does not significantly harm (DNSH) the remaining environmental objectives; and
3. Complies with the Minimum Safeguards, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Objective and Scope

Under the Corporate Sustainability Reporting Directive (CSRD) and the EU Taxonomy Regulation (EU) 2020/852, Louis Plc ("Louis") is required to disclose the extent to which its economic activities are environmentally sustainable. Accordingly, the Company reports the proportion of Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx) that is Taxonomy-Eligible and Taxonomy-Aligned.

The 2025 assessment has been prepared in accordance with the amendments introduced by Commission Delegated Regulation (EU) 2026/73, which establishes a proportionate approach to assessment and disclosure. Economic activities representing less than 10% of total Turnover, CapEx or OpEx are considered non-material for the respective KPI and are disclosed in aggregated form without detailed eligibility or alignment assessment. Where an activity is material for a KPI, the respective KPI amount is assessed in full.

Based on an analysis of Louis Plc's operations, this report presents the Taxonomy KPIs for the 2025 financial year and evaluates the contribution of relevant activities to the environmental objectives defined by the EU Taxonomy.

Main Results

Summary KPIs

The eligibility analysis for this year identified that Louis has 100% eligible turnover under the activities currently included in the EU Taxonomy.

Louis has also assessed its CAPEX and OPEX in relation to Taxonomy-eligible activities. Eligible CAPEX represents 74.918% of the total CAPEX denominator and has therefore been assessed for Taxonomy eligibility.

However, no Turnover or CAPEX activities have been identified as taxonomy-aligned with the EU Taxonomy's environmental objectives at this point.

In accordance with Commission Delegated Regulation (EU) 2026/73, OPEX is considered not material to the Group's business model and has therefore not been assessed for Taxonomy eligibility or alignment for the reporting period.



Financial Year (N)	2025														
KPI	TOTAL	Proportion of Taxonomy eligible activities	Taxonomy aligned activities	Proportion of Taxonomy aligned activities	Breakdown by environmental objectives of Taxonomy aligned activities						Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous financial year (N-1)	Proportion of Taxonomy aligned activities in previous financial year (N-1)
					Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity					
	€ '000	%	€ '000	%	%	%	%	%	%	%	%	%	%	€ '000	%
Turnover	138,641	100%	0	0.0%	-	-	-	-	-	-	-	-	0.0%	-	-
CapEx	20,488	74.91%	0	0.0%	-	-	-	-	-	-	-	-	25.1%	-	-
OpEx	0														

Turnover (Revenue)

Reported KPI		Turnover												
Financial Year (N)		2025												
Economic Activities	Code	Taxonomy eligible Turnover	Proportion of Taxonomy eligible Turnover	Taxonomy aligned Turnover	Proportion of Taxonomy aligned Turnover	Environmental objectives of Taxonomy aligned activities						Enabling activities	Transitional activities	Proportion of Taxonomy aligned in Taxonomy eligible
						Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
		€ '000	%	€ '000	%	%	%	%	%	%	%	E (where applicable)	T (where applicable)	%
Hotel, Holiday Camping Grounds and Similar Accomodation	BIO2.1	138,641	100%	0	0%	-	-	-	-	-	-	-	-	0%
Sum of aligment per objective						-	-	-	-	-	-			
Total KPI (Turnover)		138,641	100%	0	0%	-	-	-	-	-	-			0%

CAPEX

Reported KPI		CapEX												
Financial Year (N)		2025												
Economic Activities	Code	Taxonomy eligible CapEX	Proportion of Taxonomy eligible CapEX	Taxonomy aligned CapEX	Proportion of Taxonomy aligned CapEX	Environmental objectives of Taxonomy aligned activities						Enabling activities	Transitional activities	Proportion of Taxonomy aligned in Taxonomy eligible
						Climate Change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity			
		€ '000	%	€ '000	%	%	%	%	%	%	%	E (where applicable)	T (where applicable)	%
Installation, Maintenance and Repair of Energy Efficiency Equipment	CCM 7.3 CCA 7.3	1236	6%	0	0%	-	-	-	-	-	-	-	-	0%
Renovation of Existing Buildings	CCM 7.2 CCA 7.2 CE 3.2	12956	63%	0	0%	-	-	-	-	-	-	-	-	0%
Emergency Services	CCA 14.1	639	3%	0	0%	-	-	-	-	-	-	-	-	0%
Energy Generation Using Solar Photovoltaic Technology	CCM 4.1 CCA 4.1	441	2%	0	0%	-	-	-	-	-	-	-	-	0%
Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles	CCM 6.5 CCA 6.5	54	0%	0	0%	-	-	-	-	-	-	-	-	0%
Desalination	CCA 5.13	21	0%	0	0%	-	-	-	-	-	-	-	-	0%
Sum of alignment per objective						-	-	-	-	-	-			
Total KPI (Turnover)		15,348	74,91%											

Accounting Policies

In accordance with Annex I of the Commission Delegated Regulation supplementing Regulation (EU) 2020/852, the methodology for determining and allocating Turnover, Capital Expenditure (CapEx) and Operating Expenditure (OpEx) to the numerator and denominator of each KPI is outlined below.

Turnover (Revenue)

The Turnover KPI represents the proportion of revenue associated with Taxonomyeligible and Taxonomy-aligned economic activities derived from the consolidated financial statements for fiscal year 2025.

Income accounts have been selected in accordance with IAS 1 and include:

- Ordinary income from contracts with customers recorded in accordance with IFRS 15;
- Other sources of income, where applicable.

The denominator was calculated based on the income statement for fiscal year 2025, and includes accommodation services, food sales, beverage sales, management services, rental income and other operating income.

The numerator is derived from the same revenue base and includes the portion mapped to the relevant EU Taxonomy activity category, specifically activity 2.1 Hotels, holiday resorts, camping grounds and similar accommodation, based on the nature of the services provided.

During fiscal year 2025, Louis recorded a total turnover of €138.6 million (+8.3% YoY, with 100% generated from taxonomy-eligible activities).

CAPEX

The CapEx KPI represents the proportion of additions to tangible and intangible assets associated with Taxonomy-eligible and Taxonomy -aligned economic activities derived from the annual financial statements for fiscal year 2025.

In accordance with the Disclosure Delegated Act, the denominator is calculated under the International Financial Reporting Standards adopted by Regulation (EC) No. 1126/2008 and includes additions recognised under:

- IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- IAS 40 Investment Property, paragraph 76, letters a) and b), (for the fair value model);
- IAS 40 Investment Property, paragraph 79, letter d), points i) and ii), (for the cost model);
- IAS 41 Agriculture, paragraph 50, points b) and e);
- IFRS 16 Leases, paragraph 53, point h)

Following the assessment of the Group's CAPEX accounts that are in accordance with the above, the denominator was calculated as follows:

Additions (€ '000)	*2025*
Property, Plant and Equipment (IAS 16)	18,503
Intangible Assets (IAS 38)	107
Investment Property (IAS 40)	0
Agriculture Assets (IAS 41)	0
Right-of-Use Assets (IFRS 16)	1,878
Total	*20,488*

For the numerator, we have identified capital expenditures related to EU Taxonomy-eligible activities, as detailed in the table below:

Taxonomy Defined Capital Expenditures (€ '000)	*2025*
7.3. Installation, Maintenance and Repair of Energy Efficiency Equipment	1,236
7.2. / 3.2 Renovation of Existing Buildings	12,956
14.1. Emergency Services	639
4.1. Electricity Generation Using Solar Photovoltaic Technology	441
6.5. Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles	54
5.13. Desalination	21
Total	*15,348*

During fiscal year 2025, Louis recorded €15.3 million of CAPEX as Taxonomy-eligible, representing 74,91% of total CAPEX.

1.1.1 OPEX

The OpEx KPI represents the proportion of non-capitalised costs associated with Taxonomy-eligible and Taxonomy-aligned economic activities derived from the annual financial statements for fiscal year 2025.

In accordance with the EU Taxonomy Disclosure Delegated Act, operating expenses are limited to:

- Research and Development (R&D) costs;
- Short-term lease payments;
- Building renovations, maintenance, repairs, and other direct costs relating to the regular servicing of property, plant and equipment.

Taxonomy-Defined Operating Expenses (€ '000)	*2025*
R&D	0
Building Renovations, Repairs, and other Maintenance	2,7302~~9~~
Short-term Leases	1,155
Total	*3,885~~4~~*

In light of the Group's business operations, the Total Operating Expenses are mainly comprised of Personnel Expenses (49%) and Other Operating Expenses (49%), as outlined below:

Group Consolidated Operating Expenses (€ '000)	*2025*
Personel Expenses	45,941~~6,803~~
Other Operating Expenses	46,402~~083~~
Administration Expenses	2,801~~252~~
Total	*95,144*

Based on the Group's review of the above expenses, it has been concluded that the operating expenses covered by the EU Taxonomy are not significant in relation to the Group's total consolidated operating expenses, representing only 4,08 % of the total.

In accordance with the amended Disclosure Delegated Act, no Taxonomy eligibility or alignment assessment was performed for the OpEx KPI for the reporting period.

Double Counting

Louis has established internal control procedures to ensure that each KPI is calculated on a consistent and non-duplicative basis. Control checks are applied during data collection, activity mapping and financial aggregation to prevent overlapping allocations.

These procedures ensure that amounts are accurately attributed to the relevant Taxonomy activities and that reported KPIs reflect the underlying economic activities without double counting, in accordance with EU Taxonomy requirements.

Diagnosis of Compliance with Technical Criteria

Analysis of Activities

Economic Activity	Enviromental Objective	Descriprtion of Activity	KPI Impacted
2.1. Hotels, Holiday Resorts, Camping Grounds, and Similar Accommodation	Protection and Restoration of Ecosystems and Biodiversity	Operation of short-stay accommodation establishments, including hotels and short-term apartment rentals.	Turnover
7.3. Installation, Maintenance and Repair of Energy Efficiency Equipment	Climate Change Mitigation Climate Change Adaptation	Implementation of energy- efficient electromechanical systems, pool machinery, lighting, and audiovisual equipment.	Capex
7.2. / 3.2. Renovation of Existing Buildings	Climate ChangeMitigation Climate Change Adaptation Transition to a Circular Economy	Construction and civil engineering works or preparation thereof.	Capex
14.1. Emergency Services	Climate Change Adaptation	Disaster response and preparedness activities addressing climate-related hazards, including emergency medical services, search and rescue, firefighting, hazardous material response, and relief operations.	Capex
4.1 Electricity Generation Using Solar Photovoltaic Technology	Climate Change Mitigation Climate Change Adaptation	Installation and generation of electricity from solar photovoltaic systems	Capex
6.5. Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles	Climate Change Mitigation Climate Change Adaptation	Purchase of three passenger vehicles, including two hybrid vehicles, to improve fleet sustainability	Capex
5.13. Desalination	Climate Change Adaptation	Construction, operation, upgrade, extension and renewal of desalination plants to produce water to be distributed in drinking water supply systems.	Capex

Substantial Contribution Criteria

Following the identification of Taxonomy-eligible activities, the Group assessed compliance with the applicable technical screening criteria for materially relevant Turnover and CAPEX activities.

Based on this assessment, none of the assessed activities met the technical screening criteria required for Taxonomy alignment during the reporting period.

The Group will continue to monitor its investments and operations to identify potential future alignment opportunities.

Do No Significant Harm (DNSH) Criteria

The EU Taxonomy Do No Significant Harm (DNSH) principle, as defined in Article 17 of Regulation (EU) 2020/852, requires that an activity substantially contributing to one environmental objective does not significantly harm the others.

As no activities that meet the technical screening criteria were identified as Taxonomyaligned during the reporting period, a detailed DNSH assessment was not required. However, the Group performed a high-level review of the relevant DNSH requirements to understand conditions necessary for potential future alignment and will continue integrating these considerations into operational and investment planning.

Minimum Safeguards
Overview

The EU Taxonomy requires undertakings to demonstrate adherence to basic social and governance standards in addition to meeting technical screening and DNSH criteria. These Minimum Safeguards, established under Article 18 of Regulation (EU) 2020/852, ensure that activities are not considered sustainable where they create adverse social impacts.

These safeguards cover four areas:

- Human Rights
- Corruption and Bribery
- Taxation
- Fair Competition

Human Rights

The Group promotes a working environment based on respect, equal treatment and inclusion. Employee matters are managed through internal Human Resources procedures with escalation to management where required.

Louis is formalizing these practices through a dedicated human rights policy addressing employee protection and equal opportunity principles.

[For further information, refer to the section S1-1 on Policies on "Human Rights" of this Statement.]

Corruption and Bribery

Louis maintains a zero-tolerance approach to corruption and unethical conduct. Bribery, improper advantages and inappropriate business practices are prohibited and applicable anti-corruption regulations are followed.

Preventive measures include partner due diligence, employee awareness initiatives and confidential reporting channels such as the Whistleblower Policy. Reported cases are reviewed and addressed through internal procedures.

For further information, refer to the section "Anti-Corruption" of this Statement.

Taxation

The Group applies a responsible approach to taxation and complies with the tax requirements of the jurisdictions in which it operates. Practices aim to ensure accurate reporting and timely settlement of obligations rather than aggressive tax structuring.

Tax matters are overseen by internal accounting personnel supported by external advisors, with periodic checks supporting transparency and compliance.

Fair Competition

Louis supports open and fair competition and prohibits anti-competitive practices such as price-fixing, bid-rigging, market allocation and abuse of market power, in compliance with applicable competition laws.

Competitive advantages are pursued solely through lawful and ethical business conduct.

Water and Marine Resources

E3.IRO-1

Impacts, Risks, and Opportunities (IROs)

Our reporting on water and marine resources highlights the impact of water consumption across all operations, particularly in hotel units. This involves evaluating our assets and activities to assess their effect on water usage, especially considering the location of our operations in the Mediterranean region, a high and extremely high water-risk area, as per water risk maps ***(WWF Water Risk Filter, Aqueduct Water Risk Atlas)***.

Municipalities were engaged during the IRO assessment as a proxy for Affected communities.

**More detailed information regarding this assessment process can be found in sections SBM-2, SBM-3 and IRO-1 of this statement*

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Actual Negative Impact	Water Consumption	Given that our establishments are located in the Mediterranean region, a high water-risk area, our operations contribute significantly to water consumption, leading to a negative environmental impact, emphasizing the need for efficient resource management.	O*	SML**

**O= Own Operations, U = Upstream, D = Downstream., **S = Short-term, M = Medium-term,, L = Long-term.*

E3-1

Policies

Louis PLC aims to develop an environmental policy that will address key sustainability matters, including water management in our operations and by extension high water-stress areas. The policy will be published in due course and will align with the Group's broader sustainability strategy. The policy will seek to minimize material impacts and risks, implement mitigation measures to enhance resource efficiency and integrate sustainable water management practices across operational sites.

[For more information on the reasons of not having adopted a policy please refer to the section E1-2 on Policies, within this Statement.]

E3-2

Actions

Louis PLC recognizes the importance of sustainable water management, particularly given the high water-risk associated with our locations in the Mediterranean region. To mitigate our impact on water and marine resources, we have outlined certain actions spanning the medium and long term for all operations.

Current year (actions adopted within the reporting year 2025):
- Install reverse osmosis system at a hotel unit

Medium-term:
- Install pressure control systems for showers and kitchens in all units.
- Assess and replace, if necessary, any water reduction filters which are available at all our hotels.
- Implement wastewater treatment systems in all units.
- Enhance laundry management by educating customers on responsible towel washing practices (e.g., towels will only be replaced if left on the floor).

Long-term:
- Introduce sensor-based mixers and toilets to improve water efficiency.

We aim to address all above actions within the next 10 years.

Given the high water-risk nature of our operations, all actions detailed above are specifically designed to address water conservation challenges in our establishments.

Engaging guests and hotel staff is an integral element in our efforts to reduce the negative environmental impact through water consumption. We invest in training of staff for efficient water use and encourage guests to reduce water consumption through initiatives such as the replacement of towels only if left on the floor.

As mentioned in section E1-3, Louis PLC invested in environmental management training in 2025 for its workforce, at a number of units, on environmental issues, including water consumption. The Group also invested about €29k in a reverse osmosis system installation at one of our hotel units, to address the issue of water consumption in areas of high water-stress and reduce reliance on the local network, alleviating pressure on the freshwater resources and the affected community. This amount relates to operational costs within the financial statements. No other significant expenditure has been allocated within the current reporting year with reference to water consumption, nor has the Group assigned any future financial resources at the moment, however, we continue our research into water saving techniques to assess efficiency for potential implementation/installation at our hotel units in the future.

[For more information on training expenditure please refer to section E1-3 within this Statement.]

E3-3

Targets

Following implementation of ESRS reporting, we will be tracking the effectiveness of actions through defined targets, using 2025 figures as a baseline. These targets are directly linked to our negative impact on the environment through our water consumption, ensuring that we manage material impact, related to areas at water risk. The targets are not aimed at improving water quality but rather the consumption as per the material negative impact.

These targets were created by internal stakeholders (Sustainability Team) and approved by Top Management on a voluntary basis (not required by regulation), based on internal understanding on realistic expectations, specifically focused on reducing water consumption, aligning with our commitment to responsible resource use, but not based on a specific methodology or conclusive scientific evidence. While limited by data accuracy due to inconsistencies, these targets were created based on historic data of the Group's water consumption and based on the assumption that the Group will continue to expand at the same rate.

- Short-Term: Maintain water consumption at the baseline year level (2025)
- Medium-Term: Achieve a 3% reduction in water usage compared to the baseline year
- Long-Term: Achieve a 5% reduction in water usage compared to the baseline year

E3-4

Water Consumption

All water consumption information was calculated based on invoicing from the providers or direct measurements from the unit water meters. For reverse osmosis direct measurements were taken as provided by the reverse osmosis system. Extrapolation of data and estimations were not used in the calculation of total water consumption. The data has been verified by the individual Chief Engineers without validation from any external bodies other than the assurance provider. No information is currently available on water basin's water quality and quantity. Reused water and recycled water are sometimes used for garden purposes; however, this is limited and not currently recorded.



Total Water Consumption & Intensity

	2025		
	Cyprus	Greece	Total
Water Consumption			
Local Network m³	378,226	36,713	414,939
Local Network (Irrigation)m³	17,764	3,940	21,704
Ground-water m³	0	13,089	13,089
Reverse osmosis m³	0	20,718	20,718
Tanker Bought m³	2,409	8,570	10,979
Total m³	398,398	83,030	481,429
Intensity			
Net Revenue used to calculate Water intensity (in million EUR)	139		
Water Intensity (m3 per million EUR net revenue)	3,7472		

	2025		
Water Storage			
	Cyprus	Greece	Total
Total Water Storage (in m³)	2,495	957	3,452

No changes to water storage have been noted between 2024 and 2025.

Biodiversity and Ecosystems

E4.SBM-3

At Louis PLC, we recognize the importance of protecting biodiversity and minimizing environmental impact, particularly in or near protected ecosystem areas. Our material sites, as identified in ESRS 2, include establishments located within or near Natura 2000 designated areas, a European ecological network dedicated to preserving threatened species and habitats. No material negative impacts have been identified with regards to deforestation or soil sealing, however a potential negative impact has been identified in relation to land degradation.

Sites Near or Within Protected Areas

Cyprus

- **Polis 1907** – Approx. 300m from Skoulli area (CY4000009)
- **Nausicaa Beach** – Approx. 230m from Nisia sea area (CY3000006)
- **Louis Phaethon Beach, Ivy Mare, Louis Ledra Beach, and Louis Imperial Beach Hotel** – Located 1-2 km from the marine protected sea area "Moulia"

Greece

- Valmar (Louis Ionian Sun) – Approx. 45m from from Kanoni to Mesogi coastal sea zone (GR2230005) in Corfu
- Asterion Suites & Spa – Located within Rodopou peninsula – Maleme beach (GR4340003)

E4.IRO-1

Impacts, Risks, and Opportunities (IROs)

We rely on internal expertise and external biodiversity sources such as Natura 2000 Viewer (Natura 2000 map of protected areas) to gather information on the proximity of our units in relation to biodiversity sensitive areas. Based on current information a potential negative impact has been identified.

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Potential Negative Impact	Habitat destruction & fragmentation	Beach facilities like sunbeds, umbrellas and beach sports, resulting in habitat destruction, disturbance of migration patterns, and the loss of native flora and fauna	OD*	ML**

**O= Own Operations, U = Upstream, D = Downstream, **S = Short-term, M = Medium-term, L = Long-term*

Environmental Impact Assessments (EIA), concerning the impact of hotel units on the local biodiversity and ecosystems have not been conducted, therefore the assessment process of impacts risks and opportunities was conducted based on internal knowledge, and publicly available information. Although there is currently no quantifiable proof that our activities actually negatively affect biodiversity sensitive areas, we pay particular attention to potential disturbances to turtle hatching sites. Asterion Suites & Spa in Chania, Crete, shares its beachfront with the protected loggerhead sea turtles and efforts have been made to minimize any interference. Additionally, Louis Ionian Sun is located 45m from a Natura 2000 area where rich meadows of Posidonia Oceanica attracts among others, Green turtles who use the area for feeding purposes, therefore negative interference with hotel guests can have an impact on the species.

NGOs and local communities, representing affected communities, were involved in the assessment process of sustainability matters, however, were not involved in consultation discussions specifically for shared biological resources and ecosystems.

Certain actions are already in place, in an effort to mitigate the potential negative impact on biodiversity, however with limited information and lack of quantifiable data, it has not yet been concluded if further measures are necessary. The Group has not yet created a transition plan regarding biodiversity and ecosystems. Although it has been identified that the Group has a potential impact on biodiversity, this has not triggered an adaptation of the strategy and business model.

E4-2

Policies

While there is no policy currently addressing biodiversity related matters, we aim to develop and publish an environmental policy addressing a number of key sustainability issues, including biodiversity and ecosystems. The policy will be published in due course, to align with the established initiatives to protect and preserve biodiversity.*[For more information, please see section E1-2 on Policies, within this report.]*

[For more information on the reasons of not having adopted a policy please refer to the section E1-2 on Policies, within this Statement.]

E4-3

Actions

Although we have not yet developed a formal action plan or dedicated resources for biodiversity management, we are actively working to minimize our impact and raise awareness among employees and guests.

Current Efforts to Mitigate Impact through avoidance, minimisation and awareness on an annual basis (for all our establishments unless otherwise specified)

- Turtle Protection Measures: At seaside hotels where turtle nesting occurs, we ensure that sunbeds, umbrellas and beach sports activities are removed or restricted during the hatching season to prevent interference and discourage guests from using the beach during these times.
- Beach Cleaning Initiatives at all coastal retreats: Regular cleanups help reduce waste to protect coastal ecosystems and in the case of Asterion, reduce impact on turtles.
- Wildlife Conservation in Hotel Gardens: We plant and grow native flora in all our gardens.
- Education and Awareness at all hotel units: We provide notices and leaflets in public areas to raise awareness and educate guests on local biodiversity to reduce the risk of negative interactions.

As mentioned in section E1-3, Louis PLC invested in environmental management training in 2025 for its workforce, at a number of units, on environmental issues, including biodiversity. No other specific monetary amount has been dedicated for the above actions, for the reporting year or the future. Biodiversity offsets where not used in the actions detailed above. In the case of Asterion, we work with the local conservation organisation and follow their guidance for the protection of the turtle nests.

[For more information on training expenditure please refer to section E1-3 within this Statement.]

E4-4

Tracking effectiveness of policies and actions through targets

Limited national biodiversity data, time constraints and the absence of environmental impact assessments have delayed the development of a comprehensive strategy with set targets. While formal targets for tracking biodiversity and ecosystem-related impacts have not yet been established, we remain dedicated to our consistent and continuous efforts to minimize disturbance. We recognize the importance of measuring our impact and plan to integrate biodiversity goals into our long-term sustainability strategy.

No scientific methods have been used to monitor the area or the species at the moment. Monitoring is currently based on on-site observations.

Circular Economy

E5.IRO-1

Impacts, Risks, and Opportunities (IROs)

At Louis PLC, we have conducted an initial assessment of our own operations and value chain, to identify and assess impacts, risks and opportunities related to the resource use and circular economy. Through the assessment it was evident that waste generation should be our main area of focus. Assets have not been screened separately as all units are expected to have the same types of waste streams.

Although, consultations with affected communities have not been conducted to assess our resource use and impact on circular economy, stakeholders such as NGOs and local communities representing affected communities, were involved in the assessment process of sustainability matters, as explained through our DMA process.

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Actual Negative Impacts	Solid Waste	Actual generation of general waste, plastic, paper and glass waste, from all Group operations	O*	ML**
	Food Waste	Food waste generated from hotel restaurants and breakfast buffets	O*	SM**
Opportunities	Food Waste Analysis	Conducting food waste analysis will help identify inefficiencies, improve purchasing decisions and promote environmental responsibility within our operations.	O*	ML**

**O= Own Operations, U = Upstream, D = Downstream*
***S = Short-term, M = Medium-term, L = Long-term.*



E5-1

Policies

As previously mentioned, we aim to develop and publish our environmental policy in due course, which will address key sustainability priorities, including waste management. This policy will provide a structured framework to enhance resource efficiency and strengthen environmental stewardship across our operations.

Since the policy is still in development, specific commitments have not yet been finalized. However, our long-term objective remains to integrate circular economy principles into our operations.

[For more information on the reasons of not having adopted a policy please refer to the section E1-2 on Policies, within this Statement.]

E5-2

Actions

Louis PLC recognises the importance of responsible resource use and the transition towards a circular economy as key element of its sustainability strategy. In alignment with these priorities, we have developed a plan of actions to be implemented over the short, medium and long-term.

The scope of our actions includes all our units and operations unless otherwise specified.

Current year actions (actions adopted within the reporting year 2025)

- Implement the reuse of HACCP-appropriate food through donation programs, i.e. foodstuffs inventory donated following hotel season-end.
- Reduce food waste and promote sustainability awareness among guests, supported by an investment of approximately €55,000 in organic waste separation and measurement technology in the 2025 financial year for a number of our units.
- Align practices with national and EU legislation on single-use products.
- Replace plastic straws in bars and restaurants with biodegradable alternatives.
- Introduce paperless welcome letters for guests, accessible via in-room TVs and the mobile application for the majority of our units.
- Provide battery disposal bins in each hotel, conveniently located for housekeepers and maintenance teams.
- Identify and assess chemicals that are wasted during operations.
- Collect, store and analyse data on linen replacement frequencies and quantities to optimise resource use.
- Develop metrics, units and methods for waste collection to improve the accuracy of data gathered. (not achieved due to time and effort required)
- Identify the number and locations of recycling facilities available within the hotels to enhance waste management monitoring. (not achieved due to time and effort required)
- Conduct market research to identify suppliers offering more sustainable products, focusing on items that are resilient, have a longer lifespan, are reusable, or are made from upcycled materials. (not achieved due to time and effort required).

Medium-Term

• Transition to suppliers that provide biodegradable chemical products

• Launch an internal awareness campaign for employees on recycling and develop a formal recycling policy.

• Install three-section bins in rooms to facilitate the separation of PMD (Plastic/Metal/Drink cartons), paper, and general waste.

• Integrate sustainability standards and certifications when consulting on and purchasing materials for furniture.

• Launch an awareness campaign for guests focused on recycling, aimed at increasing the percentage of waste recycled and promoting the Group's environmentally friendly culture.

Long-term

• Install on-site composting facilities in at least one of our units to process organic waste generated by hotel operations, reducing the amount of waste sent to landfills.

We aim to address all above actions within the next 10 years.

As mentioned in section E1-3, Louis PLC invested in environmental management training in 2025 for its workforce, at a number of units, on environmental issues, including, waste management. In 2025 the Group also invested about €55k to improve on the network of organic waste data collection. This amount relates to Fixed Assets as part of Property, plant and equipment additions within the financial statements. No further investments/ financial resources have been discussed yet for the implementation of future actions mentioned above.

In addition to the actions outlined above, the Group participated in the Zero Waste HoReCa initiative and sectoral recognition schemes such as the Zero Waste HoReCa Awards 2025, which aim to promote good practices in waste reduction, recycling and sustainable resource management across the tourism and hospitality sector.

Following restorations and replacement of furniture, the Group worked with the Alkionides charity to donate used furniture, in an effort to reduce waste production and provide support to the affected communities.

[For more information on training expenditure please refer to section E1-3 within this Statement.]

E5-3

Targets

With the implementation of organic waste measurement technology, at a number of our establishments, we aim to set measurable targets on food waste generation, allowing for more informed purchases and resource use reduction.

Due to the lack of consistent measurable metrics and variety of different waste contracts, development of outcome-oriented targets has not been possible thus far. We aim to utilise the information provided within this Statement and as per ESRS, to set targets focused on waste generation. Targets related to food waste will only be developed once the food waste technology is implemented and is able to produce data, allowing us to produce more reliable metrics. Currently the effectiveness of our actions cannot be tracked.

E5-5

Resource Outflows

Type	Materials present in waste	2025***	Uniit
Total waste generated	General waste (20 03 02), cooking oil (20 01 25), Food waste (20 01 08), PMD, Glass, Paper, WEEE. Hazardous batteries and accumulators, printer inks, fluorescent tubes	3,052.8	tn
Total NH* waste generated	General waste (20 03 02), cooking oil (20 01 25), Food waste (20 01 08), PMD, Glass, Paper, WEEE	3,052.2	tn
Total H** waste generated	Hazardous batteries and accumulators, printer inks, fluorescent tubes	0.62	tn
NH Waste diverted from disposal (recycling and other recovery operations)	Cooking oil (20 01 25), PMD, Glass, Paper, WEEE	832.5	tn
H Waste diverted from disposal (recycling and other recovery operations)	Hazardous batteries and accumulators, printer inks, fluorescent tubes	0.62	tn
NH waste generated for disposal	General waste (20 03 02), Cooking oil (20 01 25), Food waste (20 01 08), Non recycled PMD, non-recycled paper	2,219.7	tn
H waste generated for disposal	Hazardous batteries and accumulators only (other Hazardous waste recorded was send for processing/recycling)	0	tn
Non recycled waste percentage	H & NH waste sent for disposal (Hazardous batteries and accumulators, General waste (20 03 02), Cooking oil (20 01 25), Food Waste (20 01 08), Non recycled PMD, non-recycled paper	2,219.7	tn
Non-recycled waste percentage		72.7	%

**NH – Non Hazardous **H – Hazardous ***Results are presented to the nearest decimal*

Certain waste streams relevant to the hospitality sector and the relevant activities of the Group such as cooking oil and food waste have been listed within the categories in the table above. Currently, waste reported is based on estimations. Where possible, waste data was provided by municipalities or through the relevant waste collectors (i.e. invoices). Based on hotel units with data that could be substantiated, a per bednight calculation was applied to all units and all relevant waste streams. This methodology carries a high degree of measurement uncertainty as it assumes that all hotel units produce the same amount of waste on average and as per bednight. Additionally, no waste information is available for Head offices and restaurants with the exception of certain cooking oil data and general waste.

For waste streams like disposed cooking oil, while some evidence was available for one unit, it cannot be assumed that all units have this waste stream, therefore only the substantiated information was included in the calculations for these waste streams.

Currently there is no information as to the processes followed by each transfer station unit and whether material sent to them is intended for recycling, reuse or recovery. This varies depending on the transfer station permit.

No waste was sent directly for incineration or other disposal operations and there was no radioactive waste produced.

The measurements of the above metrics have not been validated by an external body other than the assurance provider.



SOCIAL

Own Workforce

S1.SBM-2 & SBM-3

The workforce comprises both seasonal and permanent hotel employees/staff (accountants, administration staff, receptionists, housekeeping, kitchen staff, maintenance, waiters) and permanent office employees/staff in Finance, Operations, Administration and Commercial departments.

During the process of identification of impacts, risks and opportunities, the following were identified as material:

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Risks	Occupational H&S	Without appropriate training and precautions or adequate insurance coverage, occupational H&S incidents can pose a financial risk to the Group due to insurance and legal repercussions	O*	S**
	Seasonality of staff	New recruits every year can lead to loss of expertise, while there is a constant need for new staff training	O*	SM**
	Collective bargaining agreements and freedom of association	Allows staff to have a major impact on Group operations through protests	O*	SM**
	Staff shortage and recruitment issues due to geopolitical risk	Geopolitical risks have limited the availability of staff from nearby countries, leading to staff shortages and recruitment issues	U*	M**
	Cyber security / Cyber-attacks	Loss of information risking the cyber-safety of employees, can lead to potential legal action with financial and reputational consequences	O*	SM**
	CDPR	Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences.	O*	SM**

*O= Own Operations, U = Upstream, D = Downstream, **S = Short-term, M = Medium-term, L = Long-term.*

Our employees, whether permanent members or temporary, are all recognized as a core stakeholder group in our business model and as such were considered throughout the identification and assessment process of our material impacts, risks and opportunities. Additionally, open channels of communication allow for frequent feedback and respect for our employees human rights, including their privacy and safety informs our strategy. Hotel staff is more prone to occupational H&S incidents although the risk of such incidents includes all employees. The risk related to Collective Bargaining agreements refers to all employees covered by such agreements. Cybersecurity and GDPR risks arise from all employees and all employee data. Seasonality of staff risk refers to seasonal staff and staff shortages due to geopolitical risk refers to recruits from abroad.

S1-1

Policies

At Louis PLC, our policies, which are aligned with international standards, as described below, apply to all staff members and all operations and functions of the Group.

The thorough preparation for ESRS reporting provides an opportunity to identify gaps and key focus areas based on material topics to create comprehensive policies on topics that have not yet been addressed by our current official policies and procedures. In the case of Staff seasonality, Employee shortage and H&S, the Group has applied specific actions to tackle these issues with extensive procedures and a policy is not considered necessary. Collective bargaining agreements, while not addressed through a company policy, it is covered by the Industrial Relations Code as determined by the government of Cyprus.

Business Conduct and Ethics

Whilst there is no policy, we uphold human rights and inclusivity through our Code of Business Conduct & Ethics. Through strict adherence to our Code, we are committed to equality, diversity and to a culture that is free from discrimination including all unequal treatment, exclusion or preference based on race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or any other characteristic that results in compromising the principle of equality. Compliance with union regulations and labour laws is a core part of this commitment, to advance diversity and inclusion.

Louis PLC actively promotes diversity and supports underrepresented groups by offering equal professional development opportunities and fostering inclusive work environment through the Code. The Group also enforces a whistleblower protection policy (also included in the Code) allowing employees to report issues anonymously without fear of retaliation. Employees can confidentially report concerns through our whistleblower system, which ensures that every report is thoroughly investigated and leads to continuous improvement in our practices.

Zero-tolerance against discrimination and harassment is stated within our Code of Conduct and is supported by structured grievance channels Employees report concerns through designated mechanisms, ensuring confidentiality and timely resolution.

Employees may escalate concerns from their Head of Department to senior management. Minor infractions result in verbal warnings, while repeated or serious offenses such as theft or bullying lead to dismissal.

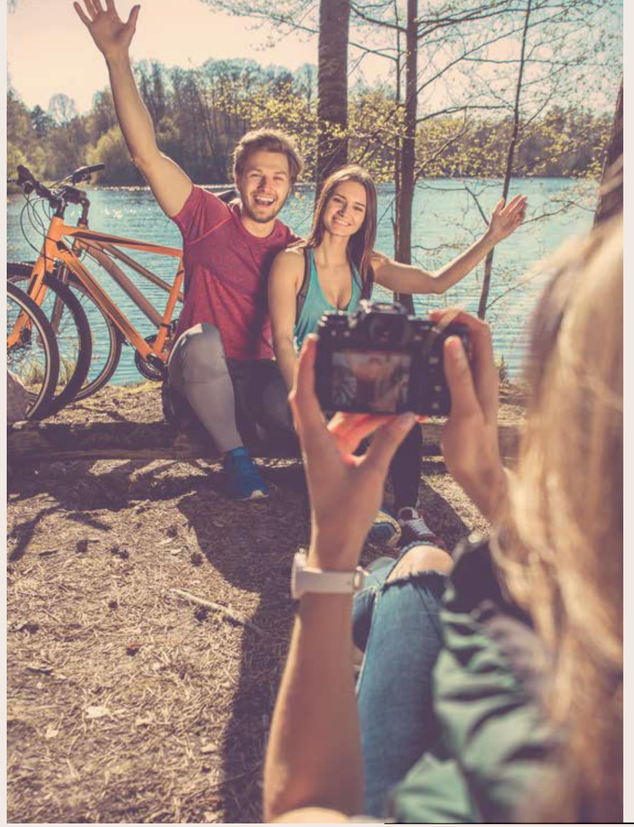
The most senior level in the Group responsible for the implementation of the Code is the Chairman, Executive Director and CEO of the Group.

[The Code covers additional matters such as anti-bribery and anticorruption. For More information on the Code of Business Conduct & Ethics, refer to section G1-1 within this statement]

Human Rights

Louis PLC respects human rights and addresses potential adverse impacts through due diligence and grievance mechanisms aligned with internationally recognized instruments, such as the United Nations Guiding Principles on Business and Human Rights. The Group takes appropriate actions, identifies risks and provides remedies where human rights violations occur or negative impacts are identified, including providing remedies such as compensation, healthcare services and other forms of support to the affected parties. Louis PLC also engages with relevant stakeholders and external parties, where appropriate, to improve these mechanisms and monitors their effectiveness through internal reviews.

To further strengthen its commitment to ethical business practices, Louis PLC aims to develop a human rights policy that will extend protections to guests and affected communities. This policy will be aligned with UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises and will explicitly address trafficking in human beings, forced and child labour as our policies are not currently aligned with the above. This policy will be publicly available in due course.



Collective bargaining agreement

The majority of employees at Louis PLC are subjected to Collective Agreements, which addresses the general provisions of the employment terms and conditions, such as working hours, wages, salary increases, annual leaves, holidays, employment conditions, termination of employment, funds, benefits and collaboration between trade unions and the employers. All employees who work outside the collective agreement, sign contracts or agree to work under the standards that follow the national labour laws. By adhering to the terms of the agreements, the Group aims to reduce the risk of protests due to non-compliance. The Group engages with employee representatives, fostering constructive dialogue and negotiations to reduce the risk of protests.

Health & Safety

Although Louis PLC does not currently have an official H&S policy in place, the Group adheres to the relevant H&S legislation through extensive procedures in place for a wide variety of incidents. A number of our establishments have been certified with ISO22000 and ISO 45001, while the standards are also implemented at the rest of our units without certification.

Information Security

The Information Security Policy defines a structured framework for the processing of information, including the purpose of processing, the parties with whom the information is shared and a description of the individuals rights regarding their personal data. The framework has been developed to include a number of policies, such as the Data Retention Policy and the Data Protection and Privacy Policy.

The scope of the policy covers all employees of the group, as well as the contractors, suppliers and third parties with access to Louis PLC's information systems, infrastructure and data. The policy also applies across all business operations and geographical locations where Louis PLC exercises management of responsibility over facilities, systems and information assets.

Accountability for the Information Security Policy lies with the Chief Executive Officer (CEO), with operational oversight delegated to the Chief Information Officer (CIO). The Information Security Department (ISD) and the Risk Management Committee provide guidance to Information Security Officer (ISO) and Data Protection Officer (DPO) to support policy implementation and monitoring of the policy.

Relevant internal stakeholders, including representatives from IT, Operations and Data Protection, are actively involved in the development and review of the policy through the Risk Management Committee. The policy is also updated whenever there is a substantiated business need or corrective measures required ensure its continued relevance and compliance.

The Information Security Policy is made available to all employees through the Group's internal Policy Portal and is reinforced through mandatory training provided via the Security Awareness Platform.

Data Protection and Privacy Policy

Through the Data Retention Policy, the Group ensures that personal records are retained in accordance with Regulation (EU) 2016/679 on GDPR, determining appropriate retention periods to ensure that the data is not kept longer than necessary for its intended purpose. It includes detailed procedures for secure destruction, suspension of deletion in the case of legal proceedings and documentation of destruction processes.

The retention periods are defined through Record of Processing Activities (RPAs), which specifies the data categories, purpose of processing, legal basis and storage durations.

The policy applies across all departments and legal entities under Louis PLC and covers all documents or other information obtained or generated, owned by or in the possession of the group or entities over which the Group has control.

Louis PLC management monitors compliance with this policy through various methods, including periodic walkthroughs, random system monitoring, business tool reports, internal and external audits, and feedback to the policy owner. Accountability for the effective implementation and oversight of the policy is the responsibility of the IT Manager and DPO. They are responsible for ensuring that the policy is applied consistently across the Group, that the records are retained and destroyed in line with the applicable retention schedules and that policy violations are addressed through internal measures.retained and destroyed in line with the applicable retention schedules and that policy violations are addressed through internal measures.

Stakeholders involved in maintaining and reviewing the policy include IT, legal and compliance teams, who contribute through the Group's Data Protection governance framework. The policy is made available to internal stakeholders via the Group's document management system, reinforced through training and onboarding, and referenced in employee privacy notices.

Data Protection and Privacy Policy

Louis PLC's Data Protection and Privacy Policy applies to all entities, business units, employees, contractors, consultants and third-party data users operating under the Group's control across all jurisdictions. It applies to all personal data processed in the context of employment, service provision, client relationships and corporate operations, covering data in physical, electronic and cloud-based formats. The policy is aligned with Regulation (EU) 2016/679 on GDPR and National law 125(I)/2018 on Protection of the Individuals with regards to the Processing of Personal Data and the Free Movement of such Data.

It incorporates the use of Records of Processing Activities (RPAs), the performance of Data Protection Impact Assessments (DPIAs) and the facilitation of Subject Rights Requests (SRRs) such as access, rectification, erasure and data portability.

To this end, the Group's responsibilities include:

- Processing personal data lawfully, fairly and transparently
- Collecting data for explicit and legitimate purposes
- Ensuring data minimisation and accuracy
- Retaining data only as long as necessary
- Implementing strong security measures to maintain integrity and confidentiality

The accountable parties for the implementation and enforcement of the policy are the DPO and the Group's Executive Management. The DPO is an appointed independent role tasked with ensuring compliance, advising on data protection obligations, overseeing DPIAs and acting as the contact point for supervisory authorities. The DPO reports regularly to executive management and coordinates the organisation's privacy governance framework.

Louis PLC management monitors compliance with this policy as security policy through periodic walkthroughs, random system monitoring, business tool reports, internal and external audits and feedback to the policy owner.

The policy's development and review involve collaboration between legal, IT, compliance, HR, and business unit leaders, with further coordination taking place through the Data Protection Forum (DP Forum) chaired by the DPO. The policy is accessible to all staff through the internal documentation system and is introduced during onboarding and reinforced through mandatory data protection training.

S1.4

Managing Risks

Key focus areas include fostering a safe workplace culture under ISO 45001:2018, maintaining ISO 22000:2018 food safety standards through regular audits, implementing continuous training and upholding equal opportunity employment, diversity and transparent recruitment policies as detailed below..

Attracting and retaining staff (addressing seasonality, shortages and collective bargaining agreement risks)

The Group implements fair employment actions providing social insurance, GESY healthcare, provident fund contributions, a 13th salary, annual leave, free meals, uniforms and career growth opportunities, based on contractual agreements.

Louis PLC follows an equitable, merit-based recruitment process in compliance with labour laws. New employees undergo a structured onboarding process, including induction seminars to familiarize themselves with our policies, procedures and corporate culture, orientation programs, training in workplace safety and hygiene and access to an anonymous suggestion box for feedback.

Established in 2007, the employee wellbeing fund supports employee well-being through financial assistance and incentives, including travel opportunities to boost workplace motivation and productivity.

The Group complies with the terms set out by the collective bargaining agreements for work-life balance and wages and constantly invests in employee training in an effort to enhance relationships with seasonal staff, encouraging them to return during the following season.

Additionally, the Group collaborates with global partners to mitigate the risk of employee shortages due to geopolitical risk, by engaging in university and recruitment agency collaborations.



Health and Safety

Extensive staff training on H&S procedures, evacuation procedures, fire procedures and use of extinguishers, are vital for the protection of all our staff and guests and we have expanded the compulsory employer's liability coverage to mitigate the magnitude of potential H&S risks and insurance coverage for guest incidents.

We monitor employment conditions through structured policies and initiatives. A number of our establishments are certified with ISO45001 Occupational Health and Safety, ISO22000 - Food Safety Management and ISO9001- Quality Management Systems. While not all units have been certified, Louis PLC's integrated occupational Health and Safety system adheres to ISO45001 for all hotel units as per the relevant national law covering 100% for all hotel employees. Each hotel unit is overseen by a dedicated full-time Health and Safety officer who monitors and enhances our performance in this area. Extensive risk management assessments for potential health and safety incidents provide clear understanding into the potential dangers and people that could be affected, allowing for the creation of prevention measures, which are again assessed for effectiveness. Should any incidents occur despite the measures, these are investigated and adjustments are made to the relevant procedures.

All safety and security measures fall under the responsibilities of the Health and Safety Officer, who coordinates and monitors the Health and Safety Committee, along with the Executive of the Health and Safety Committee, who is responsible for notifying the Group's top management of such matters. Internal H&S audits occur on a regular basis to assess procedures and spot potential issues at all units, and our risk assessment procedures are subject to review by the governmental Department of Labour, through annual inspections. Should any issues arise, these are investigated further and adjustments are made.

To emphasize the importance of Health & Safety, we have established dedicated committees across our operations and have an Emergency Action Plan for handling a number of emergencies, including but not limited to: earthquakes, fires, accidents, evacuation, food poisoning. We conduct regular readiness exercises to prepare for a range of Health & Safety emergencies and have adequate insurance coverage in case of disasters, continuously enhancing our preparedness for emerging risks and reinforcing our dedication to safe environments.

Our ultimate goal is zero accidents and zero fatalities. To this end, we track effectiveness of actions through records of all incidents, regardless of severity and conduct annual analyses to gain insights into their causes and impacts.

In 2025 we dedicated almost €800k in improvements of fire systems at our units with a further expenditure of about €1mil planned for 2026. Additionally, we invested about € 32k on external H&S training at our hotel units including food safety and lifeguarding.

These amounts relate to operational costs within the financial statements. No other recorded CapEx/OpEx has been dedicated or planned for any other actions.

Information Security

Louis PLC implements actions to ensure the effective application of its Information Security Policy, to mitigate data breach and cybersecurity risks. Regular risk assessments are carried out, with information security risks being reviewed quarterly by the Risk Management Committee. Preventive and corrective actions are taken where necessary, including technical controls, system monitoring, and breach response procedures.

The Group ensures that relevant staff is adequately trained in data handling, participate in digital training programs, through our Security Awareness Platform. The platform also offers protection against phishing and additional security controls. Employee data is kept on our SAP payroll system, with appropriate security measures.

The Data Protection Forum (DP Forum), chaired by the DPO, meets quarterly and bincludes representation from Legal, IT, and Divisional Data Protection Champions. The forum serves as the Group's main mechanism for cross-functional governance, oversight of privacy risks and implementation of action plans.

Cyberattacks

In the event of a cyberattack, Louis PLC has developed a comprehensive "Action Plan of Hotels in case of Possible Operation of Hotels Without Computerized Systems, due to Cyber Attack by Hackers". This plan outlines a series of steps to be taken immediately after an attack, including the temporary shutdown of all computer systems and emails, and with the hotels operating without these systems for up to 48 hours. The action plan aims to minimize any negative effect concerning any data, while ensuring that day-today guest services continue seamlessly and remain unaffected, with specific responsibilities for specific departments such as the Front Office & Back Office / Reservation, Accounting, Housekeeping, etc.

Data Retention

In accordance with the relevant regulation, our internal digital system for Records of Processing Activities, which provides the location of data and the relevant time periods these data should be kept, are reviewed on an annual basis by each Process Owner and further reviewed by the DPO. An annual review ensures that all data retention periods remain appropriate and aligned with applicable legal and operational requirements.

Secure destruction procedures are applied systematically for records that have reached the end of their retention period. Compliance with the policy is monitored through internal controls (periodic system checks, audits). Corrective actions are undertaken in cases of non-compliance, under the supervision of the IT Manager and the DPO.

Regular trainings are carried out to ensure that employees handling personal data comply with the data retention requirements. These activities form part of onboarding processes and are reinforced through ongoing training modules.

Data Protection

Louis PLC operates under a structured Data Protection Operating Model (DPOM), encompassing twelve core processes designed to implement the Group's data protection obligations under the General Data Protection Regulation (GDPR) and Cyprus Law 125(I)/2018. These processes include breach management, Subject Rights Requests (SRRs), Data Protection Impact Assessments (DPIAs), data retention monitoring, and compliance oversight. All business units are required to maintain a Record of Processing Activities (RPA), reviewed and signed off annually and centrally monitored by the DPO. This ensures transparency of purpose, lawful processing, and data minimisation. The above procedures are audited by an external assurance provider.

DPIAs are conducted across all business units to identify and mitigate risks prior to initiating high-risk processing activities. These assessments are logged in a central register maintained by the DPO. Additionally, Privacy by Design and Default is integrated into all new or modified systems and processes that involve personal data, embedding technical and organisational safeguards from the outset.

The Subject Rights Request procedure includes defined responsibilities for request validation, interdepartmental coordination and direct communication with the data subject. All requests submitted by employees are formally logged and tracked in a central register maintained by the DPO. Requests are processed within the GDPRmandated one-month timeframe. The DPO periodically reviews SRR processing t improve efficiency and ensure full compliance. A formally adopted SRR Procedure guides internal workflows and escalation steps, involving cooperation between HR, IT, and Legal functions.

Employee data protection is governed by the Employee Privacy Notice, which outlines the purposes of processing, data sharing practices and employee rights under GDPR. The notice specifies how personal data may be shared with third parties—such as government departments, financial institutions, auditors, or IT providers—for employment, administrative, or legal purposes. The Group ensures that all such data sharing is compliant with applicable laws and supported by appropriate safeguards.

Other than the expenditure mentioned above, no other CapEx/OpEx has been dedicated or planned for any current or future actions.

S1.5

Targets

The Group's core focus remains on adhering to policies, preventing H&S incidents and avoiding data breaches through existing and enhanced procedures. We are dedicated to continuously improving our business relationships with our employees, ensuring their needs are met through collective bargaining agreements and staff receive frequent and adequate training for all employees whether permanent or seasonal.

Louis PLC continuously assesses impacts, risks and opportunities to align with business priorities and policies. The Louis Hotels Sustainability Team, comprising employees from various departments, leads these efforts with oversight from the Sustainability Committee. Workforce representatives actively contribute to sustainability goals, ensuring key initiatives reflect employee input. Such collective efforts have facilitated the development of specific targets related to social initiatives, particularly in the domain of occupational health & safety

Outcome oriented Targets:

Short Term: Occupational H&S incidents - same level as the baseline year (2024).
Medium Term: 3% reduction in Occupational H&S Related instances compared to the baseline year.
Long Term: 5% reduction in Occupational H&S Related instances compared to the baseline year.

The targets have been set based on historical incidents data and the expertise of the relevant individuals, as to what can be reasonably achieved, specifically within the Health and Safety department of the company as well as the Department of Operations which oversees all incidents, and are in direct contact with the affected workforce.

No other targets have been set in reference to other risks, with currently no plans to develop such targets, as the aim of the Group is to minimise the number of leavers and avoid all incidents of cyber-attacks and GDPR. Returning seasonal staff is a method of tracking the effectiveness of our actions to address risks. The effectiveness of policies and actions is further measured through the year-on-year progress of recorded cases of H&S incidents, data breaches and employee complaints.

S1-6

Workforce Demographics

Employee data is collected through payroll records, with numbers representing headcount at the end of the reporting period. Due to the nature of the business, a large number of our establishments only operates on a seasonal basis, as such a large proportion of our employees are employed on a seasonal basis.

Employee Full-Time Equivalent by Gender and Region

Gender	*Greece*	*Cyprus*
Male	165	817
Female	150	663
Other	0	0
Not Reported	0	0
Total	*315*	*1,480*

Employment Contract Type by Gender and Region

Employees by contract type and gender										
Cyprus					*Greece*					*Total*
Female	Male	Other	Not Disclosed	Total	Female	Male	Other	Not Disclosed	Total	
Number of employees (FTE)										
701	849	0	0	1,550	165	194	0	0	359	1,909
Number of permanent employees (FTE)										
611	740	0	0	1,351	9	10	0	0	19	1,370
Number of temporary employees (FTE)										
90	109	0	0	199	157	184	0	0	340	539
Number of non-guaranteed hours employees (FTE)										
0	0	0	0	0	0	0	0	0	0	0
Number of full-time employees (FTE)										
701	849	0	0	1,550	165	194	0	0	359	1,909
Number of part-time employees (FTE)										
32	38	0	0	70	0	0	0	0	0	70

Notes: Employees who were seasonal were grossed up to 12-month equivalents (i.e. permanent staff)

Employee Turnover	
Total number of departures and termination	517
Employee Turnover = Total number of voluntary departures (non-seasonal) + out of the ordinary terminations / Average number of staff during the year	28.80%

Notes: Seasonal employees who were terminated at the end of the season were NOT considered as terminated (hence the grossing up to permanent staff). Terminations for the purpose of staff turnover were therefore only considered to be voluntary departures and out of the ordinary terminations.

The above data represents full-time equivalent estimations based on a monthly median number, not average as it is a more appropriate application, adjusting for the variability due to seasonality. Due to the nature of the industry within which we operate, there is some degree of measurement uncertainty. The disaggregation between male/female employees was initially calculated for full time equivalence for all employees and the ratio is then applied to the rest of the categories

The data has not been validated by an external body other than the assurance provider.

S1-8

Collective Bargaining & Worker's Representation

Collective Bargaining Agreements by Region

Collective bargaining coverage and social dialogue			
	Collective bargaining coverage and social dialogue		*Social dialogue*
Coverage Rate	Employees – EEA	Employees – Non-EEA	Workplace representation (EEA only)
0 -19 %		N/A	
20 -39 %		N/A	
40 -59 %		N/A	
60 -79 %		N/A	
80 -100 %	Cyprus, Greece	N/A	Cyprus, Greece

Collective bargaining agreements of employees in both regions of operations, ensure that employment terms, conditions and rights are negotiated and upheld through formal agreements. Employees who are not covered by these agreements adhere to voluntarily established terms aligned with industry standards to ensure fair working conditions. Louis PLC does not have agreements with a European Works Council or Societas Europaea Works Council.

The coverage rate numbers are based on actual agreement numbers in comparison to our total workforce.

The data has not been validated by an external body other than the assurance provider.

S1-13

Training & Skills Development

	Cyprus			Greece			
	Male	Female	Total		Male	Female	Total
Training hours	27,334	10,949	38,283	Training hours	3,649	2,670	6,319
Number of employees in workforce (FTE)	817	663	1480	Number of employees in workforce (FTE)	165	150	31.4
Average training hours based on total FTE employee head count	33.4	16.5	25.9	Average training hours based on total employee head count	22.1	17.8	20.1

Note: The above relate to the total training hours irrespective of topic

All units carried out extensive training both internal and external with industry professionals. Average training hours were calculated as per records held at HR and Operations departments.

Currently no performance and career development reviews are being carried out, while on-the-job feedback and communication between employees and superiors is on-going to ensure the quality of the service provided, but also to allow employees to raise concerns.

External training hours are validated by the external training providers as well as the Human Resources Development Authority of Cyprus (HRDA).

The data has not been validated by an external body other than the assurance provider.



S1-14

Health and Safety

	2025	2024
Percentage of employees covered by Health and Safety Management System (ISO 45001:2018 or other)	100%	100%
No. of Work-Related Fatalities (Employees)*	0	0
No. of Work-Related Fatalities (Other workers)*	0	0
No. of Work-Related Accidents (Cyprus & Greece)**	15	18
Recordable Accident Rate (Cyprus & Greece)	4.21	4.08
No. of recordable Work-Related Ill Health	0	0
No. of Lost Workdays Due to Work-Related Incidents***	169	375

**Number of Fatalities - The number of fatalities registered across Louis PLC and other workers resulting from work-related injuries or work-related ill health.*

***Number of work-related accidents - The number of work-related accidents represents the total consolidated incidents recorded within the reporting period for employees, as documented in local health and safety management systems. These incidents are tracked to assess occupational risks and improve preventive measures.*

Recordable accident rate for Cyprus and Greece (offices, restaurants, hotels) 2024 = (18 cases /4,411,387 hours) x 1,000,000 = 4.08

Recordable accident rate for Cyprus and Greece (offices, restaurants, hotels) 2025 = (15 cases /3,562,047 hours) x 1,000,000 = 4.21

****Number of days lost - It includes all calendar days from the first full day of absence due to work-related injuries or illnesses.*

No fatalities registered as a result of work-related injuries and work-related ill health across Louis PLC, as well other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites. All incidents cover all sites under management of the Group.

The data has not been validated by an external body other than the assurance provider.

S1-17

Incidents, complaints and severe human rights impacts

All discrimination complaints recorded through the available channels in place for employees to raise specific concerns are handled by the relevant supervisor and then Hotel General Managers. If a complained is not resolved at hotel level, it is escalated to the HR Department. In 2025 there were no escalated incidents of severe human rights or discrimination issues, therefore there were no fines, penalties and compensation for damages.

Affected Communities

S3.SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

Louis PLC recognizes that its operations directly impact the local communities surrounding its hotels and business activities as well as the wider regions/countries within which the Group operates, both in Cyprus and Greece. The affected communities are an integral part of the Group's upstream and downstream value chain.

Louis PLC is committed to fostering economic development and cultural preservation in the communities where it operates. With all its product procurement (food and beverage, general supplies, short term disposables, capital expenditure) sourced locally, the Group actively supports regional economies while reducing the environmental impact of transportation. By prioritizing local employment, Louis PLC enhances economic stability and creates opportunities for local residents..

Beyond economic contributions, the Group integrates cultural heritage into its services, offering initiatives such as the Cypriot and Greek Breakfast, a recognized label by the Deputy Ministry of Tourism in Cyprus and organizing traditional cooking and dance performances for guests. These efforts promote local traditions and enrich visitor experiences while strengthening community ties.

Louis PLC also provides direct support to local institutions through sponsorships, donations, and partnerships. Additionally, the Group drives local business growth by encouraging visitor engagement with nearby restaurants, shops, and cultural sites.

No material negative impacts, risks and opportunities were identified with regards to affected communities. Louis PLC, however, is an integral part of the communities within which it operates and the relationship with the local communities is part of our business model, a such the following positive impact was identified as material:

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Actual Positive Impact	Supporting local communities	Through job creation within hotel operations as well as within the local communities benefiting through tourism, sponsorships i.e. Polis Hospital, in-kind and monetary do-nations, and by supporting local suppliers with the majority of procurement coming from Greece and Cyprus	O*	SM**

**O= Own Operations, U = Upstream, D = Downstream.*
***S = Short-term, M = Medium-term, L = Long-term.*

If issues arise, between the Group and the local communities, the Group will respond and adjust its strategy, with the aim of fostering a positive relationship with these communities.

S3-1

Policies

Louis PLC is committed to fostering positive relationships with the communities surrounding its operations by implementing practices that support economic development, cultural preservation and environmental responsibility. The Group does not currently have a policy for managing its material impact on the affected communities. As mentioned previously, Louis PLC aims to develop a human rights policy, which we are planning to finalize and implement in due course, while we continue to support local communities through prioritisation of business relationships with local suppliers and employees and monetary and in-kind donations reinforcing economic resilience while promoting local culture. While the Group has in previous years conducted materiality assessments, the application of the ESRS helps identify gaps and priorities to develop a well-rounded policy across key topics.

[For more information on Human Rights, refer to section S1-1 on Policies within this Statement.]

S3-2

Engagement with Affected Communities

Louis PLC actively engages with affected communities to ensure their perspectives shape business decisions and that operations contribute positively to their well-being. The Group fosters direct communication through structured engagement processes, allowing local stakeholders to voice concerns and collaborate on solutions.

Engagement occurs at multiple stages:

• Ongoing monitoring – Gathering community feedback through consultations and grievance mechanisms. Louis PLC ensures affected communities are involved in decision-making through community meetings, surveys, and structured consultations, particularly for initiatives related to employment, sustainability, and local business development. The Group also maintains grievance mechanisms to allow communities to raise concerns confidentially and ensure timely resolutions.

• Remedy development – Working with affected stakeholders to resolve concerns and implement solutions.

• Post-impact evaluation – Reviewing the effectiveness of engagement and ensuring positive long-term outcomes.The Chief Operations Officer (COO) is responsible for overseeing these engagement efforts, ensuring that community input is integrated into corporate decision-making. To assess the effectiveness of these engagements, Louis PLC conducts regular evaluations, feedback loops and audits, ensuring that community concerns are addressed effectively and transparently.

The Chief Operations Officer (COO) is responsible for overseeing these engagement efforts, ensuring that community input is integrated into corporate decision-making. To assess the effectiveness of these engagements, Louis PLC conducts regular evaluations, feedback loops and audits, ensuring that community concerns are addressed effectively and transparently.

S3-4

Managing impacts on affected communities

To achieve positive impact on affected communities, Louis PLC leverages its business relationships to address potential concerns and maximize positive outcomes. This includes collaborating with industry partners, NGOs and affected communities to enhance community resilience and economic stability. The Group also engages in policy advocacy and government collaboration to support responsible business practices, environmental protections and fair labour policies.

Notably, 100% of the Group's product procurement budget is channelled to local suppliers.

Other examples of Louis PLC's community involvement include Imperial Island Resort's donations of furniture following restoration works to the Alkionides Charitable organisation contributing to improved living conditions for individuals and families facing financial hardship, as well as Kerkyra Blue Hotels's donations of foodstuffs inventory to charitable organisations following season end, reducing food waste and supporting families in need. Hilton supported charitable initiatives for children fighting cancer and the Cyprus Association for Cancer Patients and Friends (PASYKAF) by providing space and refreshments for charity events.

Initiatives like the above reflect Louis PLC's collaborative approach to strengthening community ties. By promoting sustainable tourism, the Group reinforces its commitment to making a lasting positive impact on the communities within which it operates.

While no severe human rights issues have been identified, Louis PLC remains vigilant in preventing potential adverse effects. The Operations, Health & Safety, Procurement, Internal Audit, and Finance departments play a key role in managing community impacts and driving positive social contributions.

While we have been successful in supporting affected communities and have organised in-kind and monetary donations to the communities within which we operate, at the moment, tracking effectiveness of these actions is not possible. With regards to local procurement budget, the percentage spend on local suppliers allows us to track effectiveness.

S3-5

Targets

Louis PLC has not established formal targets related to advancing positive impacts on affected communities. The Group does not consider targets on the specific impact necessary. The Group aims to maintain the positive interaction with its local communities and local suppliers, wither through in-kind donations, assisting the work of various charities as well as through donations of necessary items and monetary donations. The Group remains focused on continuously enhancing positive contributions through employment and community engagement initiatives.

Moving forward, the Group will continue to assess potential impacts, risks and opportunities, through assessing relations with suppliers and communities, so that its approach remains aligned with sustainable development and the needs of affected communities. Any future targets will be guided by stakeholder feedback, impact assessments and industry best practices.actions is not possible. With regards to local procurement budget, the percentage spend on local suppliers allows us to track effectiveness.

Consumers and End-Users

S4.SBM-2 & SBM-3 Interests and views of stakeholders & Material impacts, risks and opportunities and their interaction with strategy and business model

Louis PLC is committed to understanding and managing the material impacts of its operations on consumers and end-users. The Group primarily serves individual hotel and restaurant guests, as well as corporate clients visiting for leisure or business purposes, with a diverse customer base and the majority of clientele coming from the UK, the EU and Israel for both Greek and Cypriot establishments. With consumers and end-users linked to the core of our business, their feedback directly influences our business strategy.

The hospitality services provided by Louis PLC contribute to guests' overall well-being, offering high-quality accommodation, dining and recreational experiences that promote relaxation, cultural engagement and social interaction. The Group acknowledges material potential impacts and risks that could arise through this stakeholder group:

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Risks	Cyber security / Cyber-attacks	Loss of information risking the cyber-safety of customers, can lead to potential legal action with financial and reputational consequences.	UDO*	SM**
	GDPR	Leakage of personal data due to human error / theft or fraud could lead to legal action and penalties, as well as reputational consequences.	UDO*	SM**
Potential Negative Impacts	Guest Safety in case of accidents	Physical harm or medical emergencies due to accidents including slip and fall, poor equipment and facility maintenance.	O*	S**

**O= Own Operations, U = Upstream, D = Downstream.*

***S = Short-term, M = Medium-term, L = Long-term.*

As a central stakeholder group, in all regions of operations, all guests are considered primary end-users of the services provided by the Group and were considered during the identification and assessment of the material impacts, risks and opportunities. Given this, safeguarding guest safety, privacy, and satisfaction remains a strategic priority. While all guests are exposed to an individual incident related to the potential negative impact and the risks can arise from any guest data breach no specific consumer groups have been identified as facing heightened vulnerability.

S4-1

Policies

Louis PLC is committed to providing a safe, inclusive and high-quality experience for all consumers and end-users. To achieve this, the Group has implemented policies and/or procedures focusing on data privacy and extensive procedures focusing on guest safety, ensuring responsible business practices and full regulatory compliance.

In 2025, no cases of non-compliance with UN, ILO, or OECD guidelines were recorded, reaffirming the Group's dedication to ethical and sustainable business practices.

[For further details on Policies please refer to S1-1 of this document]

S4-2

Engaging with our consumers and end-users

Louis PLC, actively seeks guests' input at multiple touchpoints, including pre-arrival, during their stay and post-departure, using structured engagement methods such as guest satisfaction surveys, direct feedback to hotel management, sustainability-focused questionnaires, online complaint forms and hotel mobile application. Recognizing the importance of accessibility and inclusivity, anonymous reporting options are also available, allowing guests to express concerns without fear of retaliation. These interactions help shape business decisions, align offerings with guest expectations and enhance overall consumer experience.

The Chief Operating Officer (COO) holds overall responsibility for guest engagement, with the Quality Manager ensuring that service quality standards are maintained and improved based on consumer insights including on potential H&S issues. Engagement effectiveness is measured through responsiveness levels through the above channels as well as through guest satisfaction scores. This ensures that concerns are addressed efficiently, while service improvements are data-driven.

In the event of accidents, the Group investigates the specific circumstances and conditions and takes the necessary corrective measures.

S4-3

Processes to remediate impacts and channels to raise concerns

Further to S4-2 Disclosures, the Group prioritizes open and transparent communication through the previously mentioned channels, that allow guests to raise concerns and receive timely resolutions where possible. In the case of accidents, the Group remediates the impact through insurance coverage, which varies according to accident severity.

All grievances are treated with strict confidentiality, in alignment with privacy regulations, including GDPR compliance.

The Quality Manager oversees grievance-handling processes, ensuring a structured approach to issue resolution. The effectiveness of grievance channels is monitored through guest engagement metrics, including guest feedback scores, resolution rates, and complaint turnaround times. By continuously refining these mechanisms, Louis PLC strengthens consumer trust, demonstrating a commitment to transparency, accountability, and service excellence.

S4-4

Actions on impacts on consumers and end-users and managing risks

Louis PLC recognizes the importance of proactively managing negative impacts and risks. Further to the aforementioned policies, the Group manages the impact on all guests, through extensive training of staff on H&S procedures. Equipment and facilities undergo regular maintenance in accordance with regulation and manufacturer instructions to avoid any guest accidents and injuries. Additionally, H&S procedures in place to prevent accidents include evacuation procedures, adherence to fire safety regulations, signage, clear hazard indications i.e., for slip and fall, fire extinguishers, while a number of our establishments are certified with ISO22000 - Food Safety Management and ISO9001- Quality Management Systems. Under ISO22000, guests are informed of all relevant food allergens and as a minimum requirement under national and EU law, all food & beverage facilities have HACCP certifications. A Legionella management plan is also in place for all water sources, including pools, taps, SPA services, air-conditioning units, decorative water features etc.

Following any significant incidents, where appropriate action was not sufficient, the Group reconsiders its approach and sets necessary measures in place to prevent or reduce the extend of any negative impact on guests.
[For further H&S actions, please refer to S1-4 of this document]

To mitigate risks related to GDPR and cyber-security the Group ensures that staff is adequately trained in data handling and adhere to the Data Retention Policy. Insurance coverage for data breaches and information security systems are in place to ensure both the likelihood as well as the magnitude of risk are minimized. We also continue to use the specialised software ENACTIA, an AI driven comprehensive cloud suite for privacy management, assisting Louis Hotels to fully comply with GDPR.
[For further Cybersecurity and GDPR actions, please refer to S1-4 of this document]

Louis PLC conducts guest satisfaction surveys across all its properties. These surveys help measure and enhance quality performance in alignment with guest expectations.

Louis PLC actively monitors key performance indicators, including:
- Guest satisfaction ratings
- Incident reports related to cybersecurity and data breaches, emergency responses, human rights issues and health and safety
- Effectiveness of grievance mechanisms and resolution timelines

S4-5

Targets

Although outcome-oriented targets have not been put in place related to the management of material impacts and risks, the aim is strict adherence to the Group policies and the avoidance of any incidents related to guest accidents or data breaches, through existing and improved procedures, following real-time guest feedback and internal performance tracking.

With regards to the health and safety of guests, while we continue to monitor and address specific causes of accidents where measures can be taken to reduce the occurrence of accidents, setting targets for the reduction of H&S incidents is not possible.

The effectiveness of policies and actions is further measured through the year-on-year progress of recorded cases of H&S incidents, data breaches and guest complaints. Guest feedback is continuously integrated into service enhancements, ensuring that consumer perspectives shape key decision-making and play a vital role in tracking performance and identifying improvement areas.

GOVERNANCE

Business Conduct

G1.GOV-1

The Board of Directors plays a key role in setting the strategic direction of Louis PLC, ensuring that business practices reflect the Group's values and sustainability goals. The Board approves and regularly reviews the Code of Conduct, manages risks related to unethical practices such as corruption and human rights violations and integrates ethical principles into every aspect of the Group's operations—from responsible sourcing to employee well-being.

Executive Management, led by the CEO, bring these principles to life in the company's daily operations. They ensure employees receive anti-corruption training, regulations are followed and any violations are promptly addressed. Their focus goes beyond internal operations to maintaining high ethical standards across the value chain, reinforcing the Group's commitment to responsible business practices at all levels.

The Audit and Risk Committees provide independent oversight of internal controls, business risk assessments, and external audits. By ensuring transparency in financial and sustainability reporting, they help safeguard the integrity of the Group's governance structure.

The Sustainability Committee ensures that the Group's business conduct aligns with its environmental and social commitments. It oversees key sustainability initiatives, and promotes transparency in non-financial disclosures, holding the Group accountable to the broader responsibilities it has to society and the environment.

To stay aligned with evolving standards, Louis PLC ensures that its administrative, management, and supervisory bodies receive regular training on business conduct matters. In 2024, the Sustainability teams participated in CSRD and ESRS training, building on their capacities and staying current with new requirements.

[For more information on administrative, management and supervisory body expertise please refer to section GOV-1 of this document]

G1-IRO-1

Impacts, Risks and Opportunities

During the process of identifying and assessing impacts, risks and opportunities, in relation to business conduct matters, we considered all operations, in all regions, the Group's responsibilities to society, especially as a listed Group. As such, the following inherent risks were identified as material:

Type	IRO	Descriprtion	Position in the Value Chain	Time Horizon
Risks	Lack of strong corporate governance	Governance can allow a Group to be vulnerable and exposed to a variety of issues, leading to legal repercussions and reputational risk	O*	M**
	Corruption	Lack of procedures and policies in place could lead to corruption and bribery challenges	O*	M**

**O= Own Operations, U = Upstream, D = Downstream. **S = Short-term, M = Medium-term, L = Long-term.*

G1-1

Business conduct policies and corporate culture

At Louis PLC, maintaining high standards of business conduct is central to the Group's sustainability. While the company does not have an individual policy on certain matters, other than the separate whistle-blower policy as detailed below, the Code of business Conduct & Ethics is designed to ensure transparency, integrity and ethical practices across all levels of the organization including business relationships, while adhering to legal and regulatory standards. The Code as well as all other policies, are shared internally with all members of staff through the internal digital information system (Intranet).

Our Code of Conduct

On 6 March 2003, the Board of Directors of Louis PLC decided to implement all provisions of the Corporate Governance Code issued by the Cyprus Stock Exchange (CSE). This Code serves as the foundation for our governance framework and our own Code of Business Conduct & Ethics, guiding business operations. This Code has no material deviations from the CSE Code and therefore aligns with the principles of the United Nations Convention against Corruption.

The Code outlines clear commitments in key areas such as workplace equality, diversity, data protection and zero tolerance for harassment. It also covers matters such as anti-bribery and anticorruption. Incidents of anti-corruption and anti-bribery are investigated once reported through whistle-blower channels. The Code covers all parts of business operations, as well as customers and business partners and related to both material risks identified and listed above. The most senior level accountable for the implementation of the Code are the Chairman, Executive Director and CEO of the Group.
[For more information on the Code of Business Conduct & Ethics and the Whistleblower policy, refer to section S1-1 on Policies within this Statement]

Corporate Culture

The Group's corporate culture is grounded in integrity, responsibility and a commitment to continuous improvement. Senior leadership sets the tone by modelling ethical behaviour and driving sustainability initiatives, ensuring these values are reflected in every aspect of our operations.

Regular employee engagement and internal training programs help raise awareness of Corporate culture. Transparent communication and open feedback channels create a collaborative environment where employees feel empowered to contribute to the Group's evolving culture and shared success.

The Group continuously assesses and promotes its culture to ensure alignment with business goals and stakeholder expectations, through workshops, during onboarding of new employees and by sharing internal policies like the Code of Business Conduct and Ethics. Inclusive hiring practices, sustainability initiatives, and external partnerships strengthen its internal corporate identity while reinforcing Louis PLC's broader social and environmental commitments..

Reporting Concerns and Whistleblowing

Further to the Code of Business Conduct & Ethics, the Group has established a whistleblower policy and procedures to be followed. Whistleblower channels allow all employees at all levels of the Group to report issues confidentially and without fear of retaliation. Investigations are handled promptly, ensuring fairness and transparency. If violations are identified, appropriate corrective actions are taken, including disciplinary measures and process improvements. Our whistleblower protections comply with all applicable legal requirements as per Directive (EU) 2019/1937 of the European Parliament and of the Council and national legislation on GDPR, ensuring the safety and confidentiality of those who come forward.

We identify, report and investigate concerns that are raised through internal reporting channels through managers or the Human Resources department to the Chairperson of the Audit Committee, from both internal and external stakeholders.

The policy commitments of the Code of Business Conduct and Ethics and Whistleblower policy, apply uniformly to all of the Group's activities and business relationships. Although there is no specific policy for training on business conduct, to ensure awareness and compliance, the Group provides relevant training for employees and communicates these commitments through internal channels, meetings, dedicated websites and contractual agreements.

G1-3

Anti-bribery and anti-corruption

At Louis PLC, combating corruption is key to upholding our integrity. The Code of Conduct promotes transparency and accountability across all levels of the organization.

Complaint Handling and Investigation Process

All complaints or allegations related to incidents of corruption and bribery, are received by the Chairperson of the Audit Committee, who initiates a preliminary investigation. When necessary, the Head of Internal Audit conducts further investigations independently and confidentially, in line with General Data Protection Regulation (GDPR) requirements. When necessary, corrective actions—including disciplinary measures—are taken to address the issue and strengthen internal controls. Investigations leading to unsubstantiated reports lead to dismissal of reports and the complainant is informed accordingly. The outcomes of these cases are reported in writing by the Committee to the relevant administrative, management and supervisory bodies.*Data Management and Retention*

Data Management and Retention

Data related to investigations is retained only as long as necessary and deleted within three months unless judicial or disciplinary proceedings are ongoing. This approach ensures compliance with GDPR while protecting the rights and confidentiality of all involved.

While Louis PLC does not have immediate plans for additional anti-corruption procedures, the Group remains committed to its Code of Business Conduct and Ethics to prevent and address potential risks. Corrective actions are implemented as needed to enhance internal controls and maintain the highest standards of ethical conduct.

Anti-Corruption and Anti-Bribery Training

Currently, a formal anti-corruption training program is not in place. However, Louis PLC plans to prioritize training for high-risk functions such as senior management and procurement to ensure awareness and preparedness across the organization. Regular communication helps reinforce ethical behaviour and promote a culture of integrity, with management leading by example and setting the tone for the organization.

G1-4

Corruption Incidents

Indicator	2025
Confirmed incidents of corruption or bribery	0
Convictions for anti-corruption or antibribery	0
Fines for anti-corruption or anti-bribery violations	0

Convictions or fines are determined by a court of law. There were no incidents, convictions, or fines related to violations of anti-corruption or anti-bribery laws in 2025. Additionally, Louis PLC has not been involved in any legal proceedings concerning corruption or bribery and no breaches of related policies or procedures were identified. The Group also did not detect any cases of corruption or bribery directly connected to it through business relationships within our value chain. The metrics are based on internal reporting and through annual legal letters from the group's external lawyers acting as verification of internal reports, with the limitation of completeness of internal reports.

General Disclosures Index

IRO 2

EU Legislation Data Points

The table below presents the data points derived from other EU legislation, as specified in ESRS 2 Appendix B. It provides references to where these data points are addressed within this ~~report~~ ~~Statement~~ and indicates those data points that have been assessed as "Not Material" based on our materiality assessment, as well as those considered "Not Applicable (N/A)" to Louis PLC due to the nature of our activities and operations.

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS 2 GOV-1	21 (d)	Board's gender diversity	☒	☐	☒	☐	13
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent	☐	☐	☒	☐	13
ESRS 2 GOV-4	30	Statement on due diligence	☒	☐	☐	☐	17
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	☒	☒	☒	☐	N/A
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	☒	☐	☒	☐	N/A
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons paragraph	☒	☐	☒	☐	N/A

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco	☒	☐	☐	☐	N/A
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050	☐	☐	☐	☒	41
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks	☐	☒	☒	☐	41
ESRS E1-4	34	GHG emission reduction targets	☒	☒	☒	☐	42
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	☒	☐	☐	☐	43
ESRS E1-5	37	Energy consumption and mix	☒	☐	☐	☐	43
ESRS E1-5	40 to 43	Energy intensity associated with activities in high climate impact sectors	☒	☐	☐	☐	N/A

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	☒	☒	☒	☐	44
ESRS E1-6	53 to 55	Gross GHG emissions intensity	☒	☒	☒	☐	44
ESRS E1-7	56	GHG removals and carbon credits	☐	☐	☐	☒	N/A
ESRS E1-9	66	Exposure of the benchmark portfolio to climaterelated physical risks	☐	☐	☒	☐	N/A
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	☐	☒	☐	☐	N/A
ESRS E1-9	66 (c)	Location of significant assets at material physical risk	☐	☒	☐	☐	N/A
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	☐	☒	☐	☐	N/A
ESRS E1-9	69	Degree of exposure of the portfolio to climate- related opportunities	☐	☐	☒	☐	N/A

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	☒	☐	☐	☐	Not Material
ESRS E3-1	9	Water and marine resources	☒	☐	☐	☐	60
ESRS E3-1	13	Dedicated policy	☒	☐	☐	☐	60
ESRS E3-1	14	Sustainable oceans and seas	☒	☐	☐	☐	N/A
ESRS E3-4	28(c)	Total water recycled and reused	☒	☐	☐	☐	Not Material
ESRS E3-4	29	Total water consumption in m 3 per net revenue on own operations	☒	☐	☐	☐	62
ESRS 2- SBM 3 - E4	16 (a) i	Biodiversity sensitive areas	☒	☐	☐	☐	63
ESRS 2- SBM 3 - E4	16 (b)	Land impacts	☒	☐	☐	☐	Not Material

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS 2- SBM 3 - E4	16 (c)	Threatened species	☒	☐	☐	☐	63
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	☒	☐	☐	☐	Not Material
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	☒	☐	☐	☐	Not Material
ESRS E4-2	24 (d)	Policies to address deforestation	☒	☐	☐	☐	Not Material
ESRS E5-5	37 (d)	Non-recycled waste	☒	☐	☐	☐	69
ESRS E5-5	39	Hazardous waste and radioactive waste	☒	☐	☐	☐	69
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labour	☒	☐	☐	☐	Not Material
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labour	☒	☐	☐	☐	Not Material
ESRS S1-1	20	Human rights policy commitments	☒	☐	☐	☐	74
ESRS S1-1	21	Due diligence policies o issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	☐	☐	☒	☐	74

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	☒	☐	☐	☐	Not Material
ESRS S1-1	23	workplace accident prevention policy or management system	☒	☐	☐	☐	Not Material
ESRS S1-3	32 (c)	Grievance/ complaints handling mechanisms	☒	☐	☐	☐	Not Material
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents	☒	☐	☒	☐	85
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	☒	☐	☐	☐	85
ESRS S1-16	97 (a)	Unadjusted gender pay gap	☒	☐	☒	☐	Not Material
ESRS S1-16	97 (b)	Excessive CEO pay ratio	☒	☐	☐	☐	Not Material
ESRS S1-17	103 (a)	Incidents of discrimination	☒	☐	☐	☐	86
ESRS S1-17	104 (a)	non-respect of UNGPs on Business and Human Rights and OECD Guidelines	☒	☐	☒	☐	86
ESRS 2- SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	☒	☐	☐	☐	Not Material

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS S2-1	17	Human rights policy commitments	☒	☐	☐	☐	Not Material
ESRS S2-1	18	Policies related to value chain workers	☒	☐	☐	☐	Not Material
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	☒	☐	☒	☐	Not Material
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	☐	☐	☒	☐	Not Material
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	☒	☐	☐	☐	Not Material
ESRS S3-1	16	Human rights policy commitments	☒	☐	☐	☐	88
ESRS S3-1	17	non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	☒	☐	☒	☐	88
ESRS S3-4	36	Human rights issues and incidents	☒	☐	☐	☐	89
ESRS S4-1	16	Policies related to consumers and end-users	☒	☐	☐	☐	92
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	☒	☐	☒	☒	92

Disclosure Requirement	Data Point		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page/Materiality
ESRS S4-4	35	Human rights issues and incidents	☒	☐	☐	☐	93
ESRS G1-1	10 (b)	United Nations Convention against Corruption	☒	☐	☐	☐	97
ESRS G1-1	10 (d)	Protection of whistleblowers	☒	☐	☐	☐	97
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and antibribery laws	☒	☐	☒	☒	100
ESRS G1-4	24 (b)	Standards of anticorruption and antibribery	☐	☐	☐	☐	100

Closing, we hope that this report will become a strategic tool for self-improvement by promoting closer cooperation and knowledge sharing with all affected stakeholders both inside and outside the organization.

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Dear readers,
Thank you for taking the time to review this report and learn more about us. Your opinion is very important to us and we appreciate your feedback, recommendations and ideas for our continuous improvement. Please submit your views, comments and recommendations to:
maria.stylianou@louisgroup.com

Following implementation of the CSRD (Corporate Sustainability Reporting Directive) under ESRS (European Sustainability Reporting Standards), Louis PLC is committed to its reporting responsibilities and has prepared its 2025 Sustainability Report.