

Sustainability policy of Top Kinisis Travel Public Ltd

Purpose

The company is committed to promoting sustainable tourism by integrating environmental, social, and governance (ESG) principles into all aspects of our operations. We aim to lead by example, fostering responsible travel practices that protect the planet, empower local communities, and ensure long-term value for all stakeholders.

The purpose of this policy is to establish a framework for sustainable practices within our organisation by reducing our environmental impact, supporting community development, and ensuring transparency and accountability in our business processes.

Scope

This policy applies to all employees, offices, operations, and business activities of Top Kinisis Travel Public Ltd, including interactions with clients, suppliers, and other stakeholders. It encompasses all aspects of environmental, social, and governance (ESG) practices relevant to our travel and tourism services.

This policy does not apply to independent contractors, third-party vendors, or suppliers not engaged directly with the company unless explicitly stated in contractual agreements.

The Sustainability Coordinator is responsible for implementing the company's sustainability policy. They will oversee the integration of sustainable practices, monitor progress against targets, and ensure compliance with the objectives outlined in this policy.

Sustainability management & legal compliance

Sustainability commitment

Topkinisis Travel Public Ltd leadership is wholly committed to the company's sustainability performance and endorses the company's sustainability mission statement and policy.

We will use the Travelife platform to report on our sustainability progress and to monitor and evaluate progress. We are committed to communicating our sustainability performance every two years.

Sustainability management & legal compliance

Top Kinisis Travel Public Ltd is committed to the continuous improvement of sustainability practices, ensuring the alignment of our operations with global sustainability standards. We dedicate personnel, resources, and innovative technologies to monitor, evaluate, and enhance our sustainability performance, ensuring long-term positive impacts for the environment, society, and our stakeholders.

We strictly adhere to all local, regional, national, and international regulations related to human resources, human rights, children's rights, land rights, environmental management, wildlife conservation, and sustainable land use. Additionally, we commit to staying ahead of evolving sustainability legislation and standards, including Travelife certification and ISO 9001 compliance.

As part of our commitment to ethical business practices, we enforce a strict Code of Ethics that includes:

- Zero tolerance for corruption, bribery, forced labour, human trafficking, and discrimination of any kind.
- Upholding fair labour practices, including safe working conditions, fair wages, and equal opportunities for

all employees and partners.

- Respecting local communities, ensuring their rights are prioritised in our operations and partnerships.
- Supporting the preservation of biodiversity by promoting responsible tourism practices and actively reducing the environmental footprint of our activities.

To reinforce our sustainability efforts, Top Kinisis Travel Public Ltd:

- Conducts regular audits to ensure compliance with all applicable laws and sustainability commitments.
- Provides ongoing training for employees to understand and implement sustainability practices effectively.
- Engages in transparent reporting and communication, ensuring stakeholders are informed about our progress, challenges, and future goals.
- Partners with suppliers and clients to promote responsible tourism practices and raise awareness about sustainability.

By integrating these principles into our operations, Top Kinisis Travel Public Ltd ensures that sustainability and legal compliance remain at the core of our business strategy

Internal management: social policy & human rights

Employees

- We recognize that our employees are our biggest asset for delivering meaningful travel experiences to our customers. Therefore, we maintain a clear human resource policy to ensure:
 - Legal compliance in all regards
 - A safe, healthy, and welcoming workplace
 - Fair contract conditions including fair compensation
 - Training opportunities including trainings on topics of sustainability, sexual harassment and exploitation in the workplace and in the industry
 - Participation in the sustainability planning activities
 - Inclusion and equal opportunity for all employees, particularly with regard to compensation, promotion, distribution of benefits, and professional development opportunities.

Internal management: Environment

Top Kinisis Travel Public Ltd is fully committed to managing and minimising our environmental impact as an essential component of our operations. We strive to integrate sustainability into every aspect of our processes and services, fostering a culture of environmental responsibility across the organisation. Our approach is guided by the following principles:

- **Enhancing Environmental Performance:**
We actively pursue opportunities to improve our environmental practices by setting measurable objectives and targets, monitoring progress, and transparently sharing our results. This includes optimising the use of resources such as energy, water, and paper.
- **Embracing a Circular Economy Approach:**
Top Kinisis Travel Public Ltd prioritises the reduction, reuse, and recycling of materials and products, striving to minimise waste. By embedding circular economy principles into our value chain, we ensure the efficient and responsible use of resources.

- **Engaging Stakeholders in Environmental Responsibility:**
We encourage active participation in our environmental initiatives, fostering awareness and accountability among employees, suppliers, clients, and other stakeholders. Through training, education, and collaboration, we align collective efforts to achieve our sustainability goals.
- **Mitigating Pollution and Eliminating Harmful Substances:**
We are committed to minimising all forms of pollution, including noise, light, and contaminants. We proactively avoid the use of hazardous or toxic substances, adopting safer alternatives and ensuring compliance with environmental regulations.
- **Conserving Biodiversity and Protecting Ecosystems:**
Top Kinisis Travel Public Ltd is dedicated to safeguarding biodiversity by minimising the ecological footprint of our activities. We actively support the conservation of natural resources and promote sustainable management of land and water systems.

At Top Kinisis Travel Public Ltd, we recognise that environmental stewardship is a dynamic and ongoing responsibility. This policy is reviewed regularly to reflect advancements in environmental standards, emerging technologies, and evolving stakeholder expectations. By adhering to these principles, we aim to create a lasting positive impact on the environment and ensure a sustainable future for generations to come.

- **Enhancing Energy Efficiency:**
Installing energy-efficient equipment and appliances wherever feasible to optimise energy consumption and reduce overall emissions in office operations.
- **Sustainable Office Practices:**
Implementing environmentally conscious operational procedures, such as reducing unnecessary resource consumption, and fostering a culture of sustainability among employees.

Land use

- Top Kinisis Travel Public Ltd's offices are located in the centre of Nicosia, an urban area. We adhere to all local land use regulations and ensure that our business operations respect the cultural and natural resources of the region. Our commitment to sustainability extends to favouring environmentally conscious architecture and design, prioritising efficient use of space, and integrating sustainable practices into our facilities where feasible.

By operating responsibly within the urban environment, we aim to minimise our impact and contribute positively to the surrounding community and ecosystem.

General suppliers policy

Top Kinisis Travel Public Ltd is committed to sourcing products and services responsibly, minimising harmful impacts on society, culture, and nature wherever possible. We expect the same level of commitment from our suppliers, ensuring that sustainability remains at the heart of our operations.

We prioritise collaboration with partners who share our dedication to sustainability. This includes a preference for suppliers with a written sustainability statement or a clear, well-defined sustainability policy integrated into their business operations.

Supplier Expectations and Preferences

- **Local and Community-Oriented Partnerships:**
Whenever possible, we prioritise working with locally owned or managed suppliers that use local, seasonal products and services. Such partnerships should also benefit the local community by hiring locally, providing equitable employment opportunities, and maintaining fair working conditions.
- **Sustainability Certifications:**
We encourage our partners to achieve and maintain tourism-specific certifications, and globally recognised sustainability certifications, like ISO.
- **Code of Conduct Compliance:**
Top Kinisis Travel Public Ltd expects all suppliers to adhere to a Code of Ethics that ensures:
 - Full compliance with all local, regional, national, and international regulations.
 - Respect for human rights, including labour rights, children's rights, and women's rights.
 - Fair employment conditions for all employees.
 - Strict adherence to anti-corruption, anti-bribery, anti-extortion, and anti-discrimination policies.
 - Protection of children from exploitation, including sexual exploitation through tourism.
 - Environmental conservation and the sustainable use of natural resources.
 - Commitment to acting in the best interests of local communities.
 - Alignment with the values and ethical standards of Top Kinisis Travel Public Ltd.

Zero-Tolerance Policy

Top Kinisis Travel Public Ltd enforces a zero-tolerance approach to violations of our policies or the Code of Ethics, including acts of bribery, corruption, discrimination, or human rights violations. Any supplier found in breach of these policies will have their partnership with us immediately terminated.

Collaborating for Sustainability

- **Awareness and Capacity Building:**
We actively raise awareness among our suppliers about adopting responsible social and environmental practices, encouraging them to minimise their carbon footprint and operate sustainably.
- **Partnership Development:**
We work closely with suppliers to enhance their sustainability performance, offering guidance, resources, and support for continuous improvement.
- **Learning and Development:**
Top Kinisis Travel Public Ltd supports our suppliers' efforts to learn about sustainability and provides opportunities to facilitate this learning whenever feasible.

Open Communication

Top Kinisis Travel Public Ltd values transparency and maintains open lines of communication with our suppliers and stakeholders. We welcome feedback on any topic, especially sustainability, as part of our commitment to continuous improvement and collaboration.

Through this policy, we aim to create a network of responsible partners and contribute to a more sustainable and equitable future for the travel and tourism industry.

Inbound partner agencies

- In the entire process of developing and operating our travel packages, the company expects partner agencies to act in the best interests of the surrounding communities and environment as well as our guests.
- The company provides partner agencies opportunities for sustainability learning and management, including free access to the Travelife online learning and reporting platform.

Transport Policy

We prioritise partners who share our commitment to sustainability, ensuring responsible practices throughout all aspects of travel-related transportation.

When selecting transport for guests and business-related travel, Top Kinisis Travel Public Ltd is committed to choosing the most environmentally friendly options available, while considering factors such as distance, price, route, and comfort.

Reducing GHG Emissions from Transport

To minimise greenhouse gas (GHG) emissions and the environmental impact of transportation, we have established clear guidelines and implement the following measures:

- Prioritising ground transport over air travel for short-haul destinations whenever feasible.
- Matching vehicle sizes to group sizes to avoid unnecessary emissions and energy use.
- Selecting the most fuel-efficient and low-emission vehicles available when providing group or individual transport.

Measuring and Offsetting Transportation Emissions

Top Kinisis Travel Public Ltd is committed to addressing unavoidable transportation emissions by:

- Implementing systems to measure GHG emissions produced from all transportation-related activities.

Commitment to Continuous Improvement

We continuously evaluate our transport policies and partnerships to ensure alignment with the latest sustainability standards and advancements in environmentally friendly transport solutions. Through these efforts, Top Kinisis

Travel Public Ltd reinforces its dedication to reducing transportation-related emissions and contributing to a sustainable future for the travel industry.

Accommodations

Accommodation Policy

Top Kinisis Travel Public Ltd only collaborates with accommodations that adhere to the company's Code of Ethics, ensuring alignment with our commitment to sustainability and responsible tourism.

In the accommodation selection process, we prioritise properties that demonstrate strong sustainability practices, taking into account their sustainability management systems, as well as their social and environmental footprint.

Key Criteria for Accommodation Selection

- **Respect for Local Culture and Environment:**

We favour accommodations that protect and respect land use while showcasing elements of local architecture, customs, and traditions in a responsible and authentic manner.

- **Energy and Water Efficiency:**

We prioritise properties that implement measures to reduce energy and water consumption, such as using energy-efficient appliances, renewable energy sources, and water-saving technologies.

- **Waste Management Practices:**

Preference is given to accommodations that have effective waste management systems in place, such as recycling programs, composting, and minimising single-use plastics.

- **Support for Local Communities:**

We value accommodations that contribute to the local economy by employing local staff, sourcing local goods and services, and supporting community-based projects.

- **Biodiversity Protection:**

Accommodations that actively work to preserve local ecosystems, protect biodiversity, and minimise their ecological footprint are prioritised.

- **Sustainability Certifications:**

Whenever possible, we select accommodations with recognised sustainability certifications, such as GSTC-accredited certifications, B Corp, or ISO, as proof of their commitment to responsible tourism.

Ongoing Collaboration and Monitoring

Top Kinisis Travel Public Ltd works closely with its accommodation partners to:

- Promote continuous improvement in their sustainability practices.
- Raise awareness of social and environmental issues, encouraging responsible operations.
- Monitor compliance with our Code of Ethics through regular evaluations and feedback.

Zero-Tolerance Policy

We enforce a zero-tolerance approach for violations of our Code of Ethics, including but not limited to unethical practices, environmental harm, or lack of respect for local communities and customs. Relationships with accommodations failing to meet our standards will be reviewed and, if necessary, terminated.

By adhering to these principles, Top Kinisis Travel Public Ltd ensures that its accommodation partnerships contribute to a sustainable, ethical, and culturally respectful tourism experience.

Activities & Excursions

Activities & Excursions Policy

Top Kinisis Travel Public Ltd collaborates with excursion providers that adhere to the company's Code of Ethics, ensuring that all activities and excursions align with our commitment to sustainability, ethical practices, and responsible tourism.

Commitment to Responsible Excursions

- All excursions and activities offered by or on behalf of Top Kinisis Travel Public Ltd respect local customs, traditions, cultural integrity, and natural resources.
- We strictly prohibit excursions that harm humans, wildlife, the environment, or natural resources, such as water and energy.
- Excursions and attractions in which captive wildlife is held are not offered, except for activities that are properly regulated and are in compliance with local, national, and international laws. Excursions that include interactions with wildlife, comply with relevant codes of conduct. Any disturbance of natural ecosystems is minimized.

Preference for Sustainable Activities

We prioritise excursions and activities that:

- Directly benefit local communities through employment, education, and income generation.
- Respect and uphold animal welfare by avoiding activities that exploit or harm animals.
- Actively support environmental conservation and minimise their ecological footprint.

Training and Capacity Building for Providers

- We offer excursion and attraction providers opportunities for sustainability training and management. This includes free access to the Travelife online learning and reporting platform to enhance their practices and promote continuous improvement.
- Providers are encouraged to adopt responsible tourism practices and align with recognised sustainability standards.

Additional Policies

- **Community Engagement:** We favour excursions that involve authentic and respectful engagement with local communities, ensuring their cultural and social heritage is preserved.
- **Biodiversity Protection:** Excursions must not disrupt ecosystems or negatively impact biodiversity, and providers are encouraged to integrate conservation efforts into their activities.
- **Carbon Footprint Reduction:** Activities with a lower carbon footprint, such as walking, cycling, or eco-tours, are prioritised wherever feasible.
- **Accessibility and Inclusion:** We encourage providers to offer activities that are inclusive and accessible to all, ensuring equity and participation for diverse groups of travellers.

Zero-Tolerance Policy

Top Kinisis Travel Public Ltd has a zero-tolerance approach toward any violations of this policy, including unethical behaviour, environmental harm, or disrespect for local communities and wildlife. Relationships with providers failing to meet our standards will be reviewed and, if necessary, terminated.

By following these principles, Top Kinisis Travel Public Ltd ensures that all activities and excursions contribute to sustainable tourism, support local communities, and protect the environment while offering meaningful and enriching experiences for guests.

Tour leaders, local representatives, and guides

- The Company understands that guides are the intermediaries between the guests and the socio-cultural and environmental context of the destination, conveying the appropriate behaviour to them. Therefore, we make sure that all guides hired by or leading tours on behalf of are trained regularly and knowledgeable in the sustainability topics of the destination.
- Our guides are specifically trained on the critical issue of sexual exploitation of children in tourism.
- The Company provides guides with learning opportunities on sustainability topics including providing free access to the Travelife online learning platform.

Destinations: Sustainable Destinations Policy

Top Kinisis Travel Public Ltd is dedicated to promoting responsible tourism by carefully selecting destinations that prioritise sustainability and contribute positively to their communities and environments. We strive to create meaningful travel experiences while safeguarding the cultural, social, and environmental integrity of the destinations we work with.

Key Principles

- **Commitment to Sustainability:**
We prioritise working with destinations that have integrated sustainability into their community and destination development strategies. This includes efforts to promote responsible tourism, preserve natural and cultural resources, and foster inclusive economic growth.
- **Avoiding Overtourism:**

Top Kinisis Travel Public Ltd actively aims to send visitors to secondary or lesser-known tourist areas to help alleviate pressure on overburdened destinations. By promoting off-the-beaten-path locations, we enhance the visitor experience while supporting a more equitable distribution of tourism benefits.

- **Respecting Human Rights:**

We do not support or promote destinations with questionable human rights records. Our commitment to ethical tourism ensures that all destinations we work with uphold respect for human dignity, equity, and the rule of law.

- **Community-Centric Tourism:**

We favour destinations that engage local communities in tourism planning and development, ensuring that tourism provides direct benefits such as employment opportunities, support for local businesses, and preservation of cultural heritage.

- **Environmental Stewardship:**

Top Kinisis Travel Public Ltd collaborates with destinations that prioritise environmental protection, including efforts to combat climate change, reduce pollution, and protect biodiversity.

- **Cultural Integrity:**

We promote destinations that celebrate and preserve local traditions, customs, and heritage, ensuring they are shared with travellers in a respectful and authentic manner.

- **Reachability:**

In selecting new destinations the reachability through more sustainable means of transport is considered.

- **Ethical Shopping**

We do not allow the purchase of souvenirs containing threatened flora and fauna species, any illegally obtained historic/archaeological artefacts, drugs or illegal substances, and abide by local and international laws in place to prevent this.

Continuous Evaluation

Top Kinisis Travel Public Ltd regularly evaluates the sustainability efforts of the destinations we work with, ensuring they align with our values and sustainability goals. We actively encourage destinations to adopt sustainable tourism practices and provide support where feasible.

Through this approach, Top Kinisis Travel Public Ltd reinforces its dedication to responsible tourism, supporting sustainable destinations that protect their environment, respect their communities, and offer meaningful experiences for travellers.

Contribution to local communities / local economic network

- Top Kinisis Travel Public Ltd commits to positive contribution to the destinations in which we operate, by:
 - Sourcing locally and responsibly, and supporting local and traditional arts and culture
 - Respecting and advocating for all human rights (i.e. children's rights, women's rights, labour rights, etc.) as well as land rights

Environmental stewardship in destinations

- Top Kinisis Travel Public Ltd commits to environmental stewardship in the destinations in which we operate by:
 - Ensuring natural resources remain intact
 - Educating guests about the principles of responsible travel and responsible visitor behaviour

Customer communication and protection

Privacy

- Our customer protection is our priority. Therefore, we maintain a clear privacy policy to ensure
 - Legal compliance in all regards
 - Customers and their data are protected
 - Customers know how their information is being used

Marketing and communication

- Top Kinisis Travel Public Ltd strives to be truthful in all situations and at all times. We offer products and services that do what we claim in our communications.
- We honour our explicit and implicit commitments and promises.
- We are anti-greenwashing and stand behind our sustainability claims 100%.
- We endeavour to be inclusive and representative in our marketing, and to always take into account cultural, religious, and ethnic sensitivities.

Sustainability communication

- Customers are informed about the social and environmental impact of their journey, and are educated about the sustainable choices they can make, including transparent communication on:
 - Certified accommodations
 - Activities and excursions that benefit the local communities and environmental protection
 - Responsible shopping

Customer experience

- The company aims for all customer experiences to be positive, and follows strict health and safety, marketing, and excursion policies to ensure customer satisfaction. These policies cover specific topics of (but not limited to):
 - Health and safety
 - Emergency procedures
 - Privacy
 - Group numbers
 - Transport
 - Shopping
 - Sexual exploitation
 - Children in tourism
 - Satisfaction and complaints
- Topkinisis Travel Public Ltd maintains open lines of communication with our customers and encourages feedback at any time and on any topic, particularly sustainability.

Contact / Responsible person

All staff are responsible for the ownership and undertaking of this policy.

All staff are responsible for the promotion and implementation of this sustainability policy within their departments.

Definitions

“The company” is defined as “Top Kinisis Travel Public Ltd.”