



Sustainability Report
2019

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LETTER FROM THE FOUNDERS

When we founded Lefay Resorts in 2006, our vision was clear. We wanted to create the places of our dreams. A goal that we achieved in 2008, with the opening of our first property. Lefay Resort & SPA Lago di Garda was recognised over the following years as one of the most successful spa destinations in the world, with over 65 international awards.

2019 marked a milestone for our company as we opened the second jewel of the Collection. Lefay Resort & SPA Dolomiti is located within the Madonna di Campiglio ski area in the mountains declared by UNESCO a "World Heritage Site". The Lefay experience now embraces two wonderful destinations - both in extraordinary natural settings.

Throughout all these years we have continued and further strengthened our commitment towards environmental sustainability and corporate social responsibility; from the design and construction phases of our Resorts, perfectly integrated into the surrounding areas and powered by renewable energy sources, to the efficiency of energy and water saving, as well as in the enhancement of our human resources to support the development of local communities. The resort has also gained the most prestigious environmental certifications in the industry and has offset its emissions achieving 100% CO₂ free for the past six years.

Despite the recent uncertainty in the world,

we want to continue on the same path with the same passion to remain an example of a responsible and innovative business.

Domenico Alcide Leali – Chairman

Liliana Leali – Deputy Chairman
Executive Director of Project Development



LETTER FROM THE CHIEF EXECUTIVE OFFICER

Personal wellness should never overlook environmental wellness. We have worked intensively following this principle over many years to create the Italian reference brand in the luxury wellness hospitality industry. The process of growth is not simply associated with the idea of expansion, but with an intensification of our commitment towards environmental and social responsibility.

2019 was a significant year for the Lefay Group: last August, in fact, the new Lefay Resort & SPA Dolomiti opened its doors to Guests. An innovative property that, in addition to the 88 suites, two restaurants and a series of dedicated services, features a wellness area of over 5,000 square meters, one of the largest in the Alps. Furthermore, the project includes the creation of 21 Lefay Wellness Residences, the first serviced branded residences in a luxury SPA Destination in Italy.

We have also finalised the strategic path that has led to the definition and implementation of the company's business model, focused on three business segments: the first, "Resort Operations", includes the properties whose operations are owned by the Group (Lago di Garda and Dolomiti), the second, "Residential Sales", relates to the sales of our Lefay Wellness Residences (Dolomiti) and the third consists of the "Management Services" for the design and subse-

quent management of properties owned by third parties. We are glad to underline that 2019 saw an unprecedented growth in both turnover (+85%) and net profit (+261%). This result was made possible by three factors: the opening of the new Resort, the consolidation of the Lefay Resort & SPA Lago di Garda performance and the excellent start of "Residential Sales", with nine units sold during the year.

The Green identity of our Brand has also been confirmed by the new Resort in the Dolomites which, in addition to obtaining the ISO 14001, ISO 9001 and ClimaHotel® certifications, will soon be 100% CO₂ free. At the same time, we have strengthened our efforts to make our first property, Lefay Resort & SPA Lago di Garda, even more efficient and sustainable, with further improvement in water consumption and in the reduction of disposable plastic and paper materials.

The achievement of these results has been possible thanks to the dedication and hard work of our Staff Members, who have now grown to more than 300 thanks to the opening of the new Resort. We are really pleased to see how the employee enhancement process, implemented by the company for several years now, continues to receive an excellent response, with the average staff turnover decreasing even further in 2019.

Although the COVID-19 pandemic has had a strong impact on our business in early 2020, we are all strongly motivated to pursue the company development strategy, which foresees both the completion of the "Resort Operations" segment with a third property in Tuscany and the expansion abroad through management contracts with selected partners who share our same values.

I am confident that we will be able not only to overcome the current uncertainties by setting the basis for further growth, but also to continue to be an example of a responsible and innovative business in our industry.



Alcide Leali - Chief Executive Officer



OUR STORY



1980 - 1989

Domenico Alcide Leali, after graduating in Economics and Management, began working in the family group, the “Acciaierie e Ferriere Leali Luigi”. He oversaw management and financial aspects of the group. Acquired experience and continued corporate responsibility resulted in Domenico Alcide Leali being appointed as Chief Executive Officer of the Leali Group in 1987 and as Executive Chairman in 1995.

1989 - 1992

Together with his wife Liliana, a graduate in Architecture, in 1989 Domenico Alcide founded Air Dolomiti with the aim of offering connecting flights from major Italian airports to important European destinations.

1992 - 1999

Air Dolomiti soon attracted the attention of major industry operators: in 1992, a partnership agreement was signed with Crossair, a pioneer in Europe’s regional transport, and in 1994 with Lufthansa, the German flag carrier. Thanks to the agreement with the German company, Air Dolomiti entered the world’s largest alliance, the Star Alliance. The partnership with Lufthansa was strengthened in 1999, when the latter acquired share capital in Air Dolomiti.

1999 - 2003

In 2001, a new growth phase started for Air Dolomiti which went public and its fleet was expanded with new regional jets. The Air Dolomiti experience ended successfully in March 2003, when Domenico Alcide Leali decided to sell the Company to Lufthansa.

2006 -2008

After achieving world-renowned accolades with Air Dolomiti, the entrepreneurial couple decided to launch an innovative brand in the luxury wellness hospitality industry through the creation of high-end properties featuring unique locations, low environmental impact, cutting-edge wellness and integrated service management. In 2006, Lefay Resorts was founded. In 2008, the first property of the Collection was opened, Lefay Resort & SPA Lago di Garda, in Gargnano on the Brescia shore of Lake Garda.

2013

Lefay Resort & SPA Lago di Garda continued to enhance the experiences offered to Guests: in 2013, the Royal Pool & SPA Suite (featuring a total area of 600 square metres) and the new Meeting Area were introduced.

2016

Lefay Resort & SPA Lago di Garda soon obtained major international awards that culminated in 2016 in the award as “Worldwide Health & Wellness Destination” at the prestigious “World SPA & Wellness Awards”. In early 2016, to best meet the group’s expansion strategy, Gargnano’s real estate property and management were transferred to a new company (Lefay Resort Garda SRL), transforming Lefay Resorts SRL into the Management Company.

2017

Thanks to a unique wellness experience, Lefay Resort & SPA Lago di Garda confirms its identity as a global SPA Destination with two additional awards: “Best SPA in the World” at the World Boutique Hotel Awards and “Best SPA in Europe” at the European Health & SPA Award. An original philosophy that is also found in the renewed Lefay SPA Cosmetics Line, created with full respect for the environment and certified Vegan OK and Cruelty Free. During the same year, the construction of the second Resort of the Collection, Lefay Resort & SPA Dolomiti began, located in the Madonna di Campiglio ski area, in Pinzolo.

2018

On the tenth anniversary of the first Resort, the Group takes its first steps into the “Serviced Branded Residences” within the new Lefay Resort & SPA Dolomiti, becoming the first Resort in the Italian market to offer residences of this kind in a SPA Destination (their sales starts in July of this year). On Garda Lake, the first Property is reconfirmed “Best SPA Destination” at the European Health & SPA Award and is recognised as “Europe’s Most Sustainable Hotel” at the World Boutique Hotel Awards, gaining more than 60 international acknowledgements in ten years.

2019

Lefay Resort & SPA Dolomiti welcomes its first guests on August 1st 2019. By the end of the same year, the first accolade came with the award “Best New Openings” at the Prime Traveller Awards and half of the residences are either sold or reserved. In the meantime, Lefay Resort & SPA Lago di Garda confirms its identity as international SPA destination, obtaining further awards, among which “Best SPA Destination” and “Best Signature Treatment” at the European Health & SPA Award 2019.



OUR PATH
TO SUSTAINABILITY



KEY FIGURES
FOR 2019

2

Properties

65.500

overnight Guests

33.502.549

€ total
turnover

9

Wellness Residences sold
(7 of which already delivered)

311

total Staff members

60%

of Staff is local

95%

Guests' level of satisfaction

100%

CO₂ neutralisation

15

Awards, among which "Best Destination SPA" at the European Health & SPA Award given to Lefay Resort & SPA Lago di Garda and "Best New Opening 2019" at the Prime Traveller Awards obtained by Lefay Resort & SPA Dolomiti

1

Nomination to the CR Reporting Awards for the Sustainability Report in the category "Best Carbon Disclosure Report"



SUSTAINABLE DEVELOPMENT GOALS



In 2015, the governments of the 193 UN countries created "The 2030 Agenda for Sustainable Development", a programme of action for people, the planet and prosperity, summarised in 17 objectives (Sustainable Development Goals - SDGs) aimed at ending poverty, fighting inequality, promoting social and economic development, combating climate change and building peaceful societies.

Lefay Resorts & Residences social and environmental responsibilities can be identified in 13 of the 17 objectives of the 2030 Agenda, with the aim of fitting into the global framework of commitment to sustainable development, by explicitly stating how the Company is contributing to this global commitment:



UN Goal 1:
Put an end to all forms of poverty in the World.
Lefay is actively engaged in contributing to the reduction of world poverty through donations to NGOs operating in various fields.
*(Section: "The Territory", Chapter: Donations)



UN Goal 2:
End hunger, achieve food security, improve nutrition and promote sustainable agriculture.
Lefay endorses local products and products coming from eco-sustainable and ethical-sustainable agriculture in all its Resorts, encouraging guests to consume eco-friendly food.
*(Section: "The New Luxury", Chapter: Sustainable Cuisine: Lefay Vital Gourmet; Section: "The Territory", Chapter: Sourcing)



UN Goal 3:
Ensuring health and well-being for all and for all ages.
Lefay has chosen to use natural materials inside its Resorts and to install innovative heating and cooling systems to guarantee maximum comfort for guests and staff.
*(Section: "The Environment", Chapters: Thermal Insulation and Natural Materials)



UN Goal 4:
Provide quality, fair and inclusive education and opportunities for everyone.
Lefay actively promotes the development of the skills of its staff, offering numerous opportunities for training and professional and managerial growth.
*(Section: "The People")



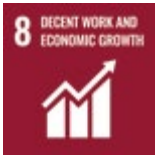
UN Goal 5:
Achieving gender equality and emancipating all women and girls.
Lefay promotes the principle of gender equality in its policies towards its staff, as well as in the way it offers services and products and in the methods of communication used.
*(Section: "The People")



UN Goal 6:
Ensure the availability and sustainable management of water and sanitation for everyone.
Lefay monitors the water consumption of its Resorts and tries to reduce it year after year, promotes sustainable management of the laundry and encourages guests to pay attention and measure their water use.
*(Section: "The Environment", Chapter: Water)



UN Goal 7:
Ensuring that everyone has access to cost-efficient, reliable, sustainable and modern energy systems.
Lefay prefers the use of clean energy sources thanks to the technological features of its Resorts, the bio-architecture principles with which they are built and efficient resource management.
*(Section: "The Environment", Chapters: Heat Insulation, Energy, CO₂ Emissions)



UN Goal 8:
Stimulating lasting, inclusive and sustainable economic growth, full and productive employment and decent work for everybody.
Lefay promotes the sustainable development of local communities by investing in sustainable tourism, involving local communities and creating jobs. In addition, it protects health and safety in the workplace, encourages family work-life balance, and constantly invests in the training and professional growth of employees.
*(Sections: "People", "The Territory", Chapters: Employment of Local Co-operatives, Promotion of the Territory)



UN Goal 10
Reducing inequality within and between nations.
Lefay promotes the inclusion of all employees, regardless of age, gender, disability, race, ethnicity, origin, religion, economic status or other.
*(Section: "The People")



UN Goal 12:
Ensuring sustainable patterns of production and consumption.
Lefay is constantly redirecting waste production and the use of disposable materials, while increasing the purchase of environmentally friendly products.
*(Section: "The Environment", Chapter: Waste)



UN Goal 13:
Promote action, at all levels, to combat climate change.
Lefay is committed to continuously reducing CO₂ emissions from its activities and compensates 100% of the emissions generated.
*(Section: "The Environment", Chapter: CO₂ Emissions)



UN Goal 14:
Conserve and sustainably use the oceans, seas and marine resources for sustainable development.
Lefay reduces the use of disposable plastic and favours the purchase of fish products from sustainable fishing.
*(Section: "The New Luxury", Chapters: Sustainable Cuisine; Lefay Vital Gourmet; Section: "The Environment", Chapter: Waste)



UN Goal 15:
Protect, restore and promote sustainable use of the ecosystem, sustainably manage forests, counteract desertification, halt and reverse land degradation and stop the loss of biological diversity.
Lefay promotes gender equality in all its policies related to Staff management, as well as in the services and products offered and in communication actions.
*(Section: "The Environment", Chapters: Biodiversity, Environmental Impact)

SUSTAINABILITY REPORT

BOUNDARIES

Sustainability means developing a business model designed to achieve economic and financial goals while fully respecting the environment and promoting the development of the local area and the professional growth of the company's Staff. To communicate in a clear and transparent manner the commitment made to its stakeholders, from 2014 Lefay summarises the results achieved by the Group in the economic, social and environmental fields and the objectives for future improvement in the Sustainability Reports published annually. The 2019 Sustainability Report is thus the fifth, and like those of previous editions, it has been created following the internationally recognised Global Reporting Initiative standards (Core option). The GRI application has been verified by the TÜV SÜD certification body. As in the previous year, the 2019 Sustainability Report was also prepared on the basis of the new corporate structure that the Lefay Group implemented at the end of 2015. Starting from 2016, the activities carried out up to the previous year by a single company are carried out by two distinct entities: Lefay Resorts S.r.l., which essentially performs as a holding and management company, and Lefay Resort Garda S.r.l., which owns and manages Lefay Resort & SPA Lago di Garda. The 2019 Sustainability Report, in line with the 2018 document, presents data from Lefay Resorts S.r.l. and Lefay Resort Garda S.r.l., paying particular attention to the data of the latter company, the most interesting and significant from an economic, environmental and social point of view. Where possible, the report also

presents Lefay resort Dolomiti S.r.l data, taking as reference the period 1st august 2019 (opening date) 31st December 2019. The complete Assurance Report is published at the end of this document. By engaging its stakeholders, Lefay Resorts endeavoured to understand their expectations and identified those on which the activities of the company impact in a significant manner:

- Staff and Guests' satisfaction;
- Reduction of the environmental impact;
- Development and promotion of local area;
- Achievement of one of the highest economic performances of the industry.

For each impact, specific indicators in the Global Reporting Index, described in the document, were selected. Compared to 2018, the sources of data and the rate of collection remained unchanged, in particular:

- The Sustainability Report is published annually. The 2019 edition refers to the period 1st January – 31st December 2019
- The results of the global satisfaction of Guests are updated annually on the basis of a monthly analysis of the completed surveys.
- Energy and water consumption figures are updated yearly on the basis of the monthly readings taken by the engineering department and refer to Lefay Resort Garda S.r.l., while the consumption figures of Lefay Resorts S.r.l. are to be found at the end of the document in a specific Addendum.



- The calculation of CO₂ emissions is updated every year and validated by TÜV SÜD. Monitoring activities began in 2011, while the first year when 100% of emissions were offset was 2013. When the emissions are calculated, Lefay purchases CERs, which are required to fully offset of the annual emissions.
- As in the past editions, in the event that the methods of calculation are the same and data are comparable, the 2018 Sustainability Report also shows the data of the previous years, to provide evidence of past trends.
- Also this year's Staff data both for Lefay Resorts S.r.l. and Lefay Resort Garda S.r.l. are displayed together.



01

NEW LUXURY

“Dedicated to those who are willing to look beyond things,
to those who love to get lost and find themselves again.”



VISION & MISSION



VISION
“To create places of our dreams.”

MISSION
“To become the Italian reference brand in the international market of luxury wellness holidays through the creation of a collection of eco-resorts according to the Italian style and living and the new Lefay concept of luxury.”

OUR VALUES



NEW LUXURY
We believe that the concept of luxury is being redefined and is becoming more and more focused on aspects such as space, nature, silence, time for oneself, discrete service but still with great attention to detail.

GLOBAL WELLBEING
A wellbeing which embraces the entire holiday experience, wide spaces, both indoors and outdoors, the harmony of the architectural integration, the natural materials used, the “Vital” Mediterranean diet and above all the Lefay SPA Method wellness philosophy are all expressions of Lefay Global Wellbeing.

SUSTAINABILITY
Sustainability means developing a profitable business model by creating something worthwhile, and that means we take our social and environmental responsibilities very seriously.

PEOPLE
The real key to our success is the excellence of our Staff, whose satisfaction for us must be as strategic as the satisfaction of our Guests.

ITALIAN CHARACTER
We offer a slice of contemporary Italian style, taste and elegance. Everything from the interior design, the Mediterranean cuisine, the friendly service and the wellness offering to the attention to detail are delivered in an authentic and traditional Italian way.

BUSINESS MODEL

Lefay Resorts & Residences is specialised in the development and management of luxury SPA Resorts. In addition to the hotel operations, our projects may also include a residential development with hotel services ("Serviced Branded Residences"). The company's activity can be divided into three main business segments:

- Resort Operations
- Residential Sales
- Management Services

RESORT OPERATIONS

Lefay owns and manages luxury SPA Resorts located in Italy, on Lake Garda and in the Dolomites. For each of the properties belonging to this segment, a management contract is stipulated between the individual operating companies and Lefay Resorts S.r.l. for the use of the Brand and the management services provided.

RESIDENTIAL SALES

Lefay is involved in the development and marketing of Serviced Branded Residences (luxury residences with hotel services) under the brand name "Lefay Wellness Residences". During their stay, Owners may benefit from the services of the Resort while, when not in house, they can participate in the Rental Programme, to make their own residence available to the Resort and receive a share of the sale proceeds. The first Lefay Wellness Residences have been built within Lefay Resort & SPA Dolomiti.

MANAGEMENT SERVICES

As part of the Group's growth strategy, Lefay is identifying market opportunities for managing properties owned by third-party investors on the basis of management contracts, which provide for remuneration by means of fees during the construction and the management stages.

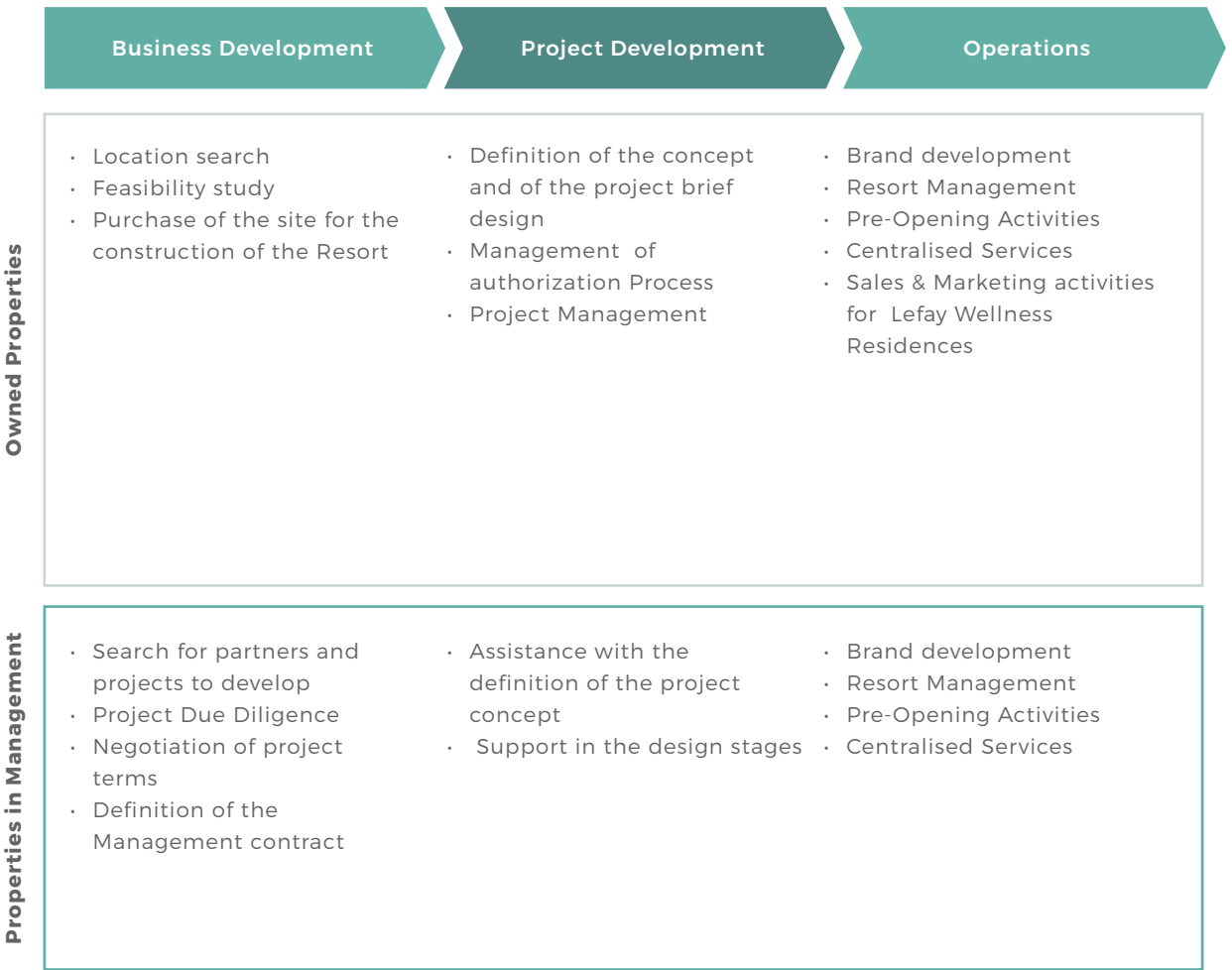
2019 REVENUES



INTEGRATED BUSINESS MODEL

The integrated business model created by Lefay Resorts & Residences guarantees full control by the Management Company over the quality of the ser-

vices provided, from the process of project development to the management of the Resorts.





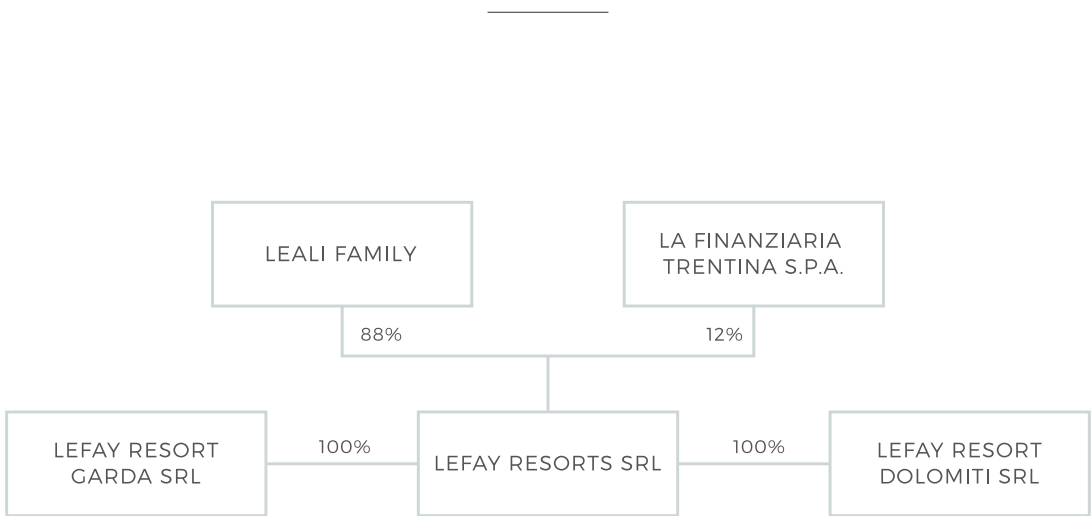
EXPANSION STRATEGY



After the successful results obtained with Lefay Resort & SPA Lago di Garda and the recent opening of Lefay Resort & SPA Dolomiti, the Group aims at completing the Italian portfolio of three owned properties, with a third Resort located in Tuscany. At the same time, the Company is also developing the fee-based business model, in

search of selected favourable opportunities, with a special focus on partnerships abroad, in which Lefay would operate through management contracts. Throughout the very first steps of this segment actions, the partners' research is mainly restricted to the alpine region (Austria, Switzerland and Germany).

CORPORATE STRUCTURE



Lefay Resorts S.r.l., controlled by the Leali family, is the parent company of the “Lefay Group” and holds the ownership of Lefay Resort Garda S.r.l. and Lefay Resort Dolomiti S.r.l. The parent company Lefay Resorts S.r.l. acts both as operating holding company and as management company for the Lefay brand; specifically, the Company deals with the development and promotion of the brand (which it owns) and provides the following services to subsidiaries that hold the ownership of the Resorts:

- hotel management services through management & licensing contracts;
- project development & management services for the conceptualization and implementation of new properties;

- centralised services including sales & marketing, central reservation office, administration, finance and control, IT services and centralised purchases;
- supply of Lefay branded cosmetics and products (e.g. Cosmetics, Home Fragrance, Extra virgin olive oil and wine).

Furthermore, the parent company handles the research and development of new projects to be carried out under the Lefay brand. Lefay Resort Garda S.r.l. owns and manages Lefay Resort & SPA Lago di Garda, the first Group’s property opened in 2008 in Gargnano (BS). Lefay Resort Dolomiti S.r.l. owns and manages the second Resort, Lefay Resort & SPA Dolomiti, located in the Madonna di Campiglio ski area, in Pinzolo (TN),

ORGANISATIONAL STRUCTURE

LEFAY RESORTS



Board of Directors:

Chairman:
DOMENICO ALCIDE LEALI

Deputy Chairman:
LILIANA BRESCIANI LEALI

Chief Executive Officer:
ALCIDE LEALI

Directors:
MASSIMILIANO LEALI
GIOVANNI RIZZINI
MASSIMO FEDRIZZI

Supervisory Board:

President:
NEVIO DALLA VALLE

Auditors:
CLAUDIO ZORZAN
ENRICO POLLINI

Independent Auditing Company:

BDO ITALIA S.P.A

BUSINESS
REVIEW

LEFAY RESORTS GROUP

Starting from 2017, Lefay Resorts S.r.l. has begun to prepare the consolidated financial statements on a voluntary basis, the scope of which includes, in addition to the parent company, the subsidiaries Lefay Resort Garda S.r.l.

and Lefay Resort Dolomiti S.r.l. (as illustrated in the section Corporate structure).

The reclassified consolidated economic data for the 2019 financial year is shown below:

DATA IN EURO THOUSANDS	2019	2018	VARIATION %
REVENUES FROM SALES	33.503	18.062	85%
Change in inventory of work in progress, semi-finished and finished goods	1.174	1.769	-34%
Increases of fixed assets for in-house works	790	295	168%
Other revenues	676	562	20%
VALUE OF PRODUCTION	36.144	20.689	75%
Consumption of raw materials	4.911	2.453	100%
Costs of services	12.055	6.892	75%
Rent and leasing expenses	655	393	67%
Personnel costs	9.850	6.654	48%
Other operational costs	917	547	68%
EBITDA	8.810	3.707	138%
Depreciation and amortisation	4.090	2.169	89%
EBIT	4.719	1.538	207%
Financial income and expenses	1.283	424	203%
EARNINGS BEFORE TAXES	3.437	1.222	181%
Taxes	1.114	578	93%
NET RESULT	2.323	644	261%

Concerning the consolidated financial statement, 2019 has shown a clear improvement compared to the previous year:

- Revenues from sales reached 33.502.000 euros, with an increase of 15.440.000 euros (+85%);
- EBITDA reached 4.719.000 euros, with an increase of 3.073.000 euros (+187%);
- Net Result after taxes was 2.323.000 euros, with an increase of 1.679.000 euros (+261%).



RESORT OPERATIONS



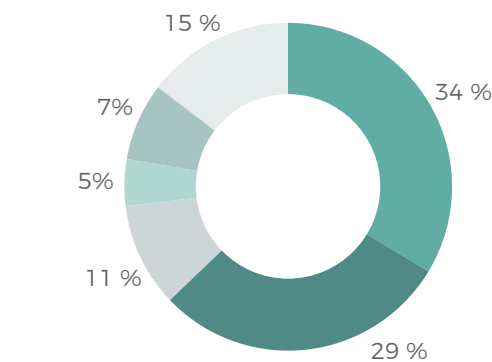
The "Resort Operations" segment saw significant growth in turnover in 2019 (+ 29%) thanks to the opening of the new Resort in the Dolomites and further consolidation of the Resort's performance on Lake Garda.

Lefay Resort & SPA Lago di Garda recorded an average room occupancy rate of 80% during the year, also thanks to the strong demand of guests during the winter months. Concerning origin market mix of overnight guests, 2019 has seen a consolidation of the reference markets, (Italy, Germany, Switzerland, Austria and the United Kingdom). At the same time, a strong growth of new markets must be highlighted, with regards to North America, Russia and the Middle East, to which several commercial and promotional initiatives have been addressed over the last years.

Lefay Resort & SPA Dolomiti, which opened on August 1, 2019, has already registered an excellent commercial and public response in the first few months, achieving an occupancy rate of 62% with a clear predominance of the domestic market.

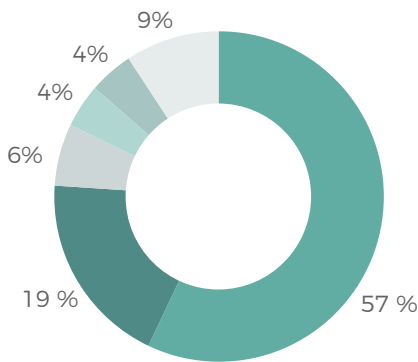
ORIGIN MARKETS

LAGO DI GARDA



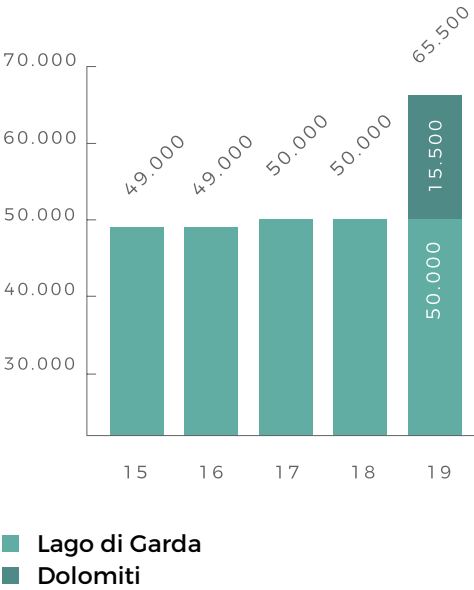
- Italy
- Germany-Austria-Switzerland
- Uk & Ireland
- CIS & Ukraine
- North America
- Rest of the World

DOLOMITI

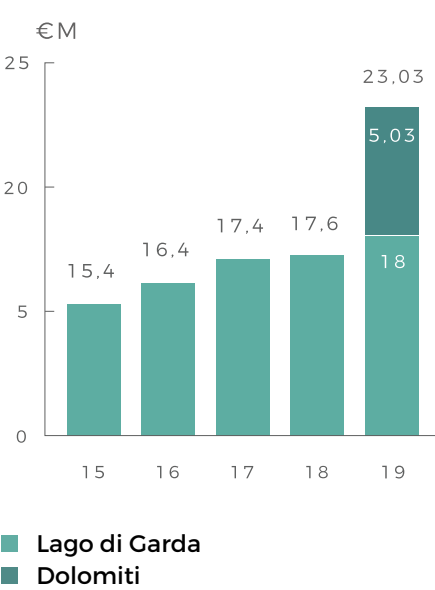


OVERNIGHT GUESTS & TOTAL TURNOVER

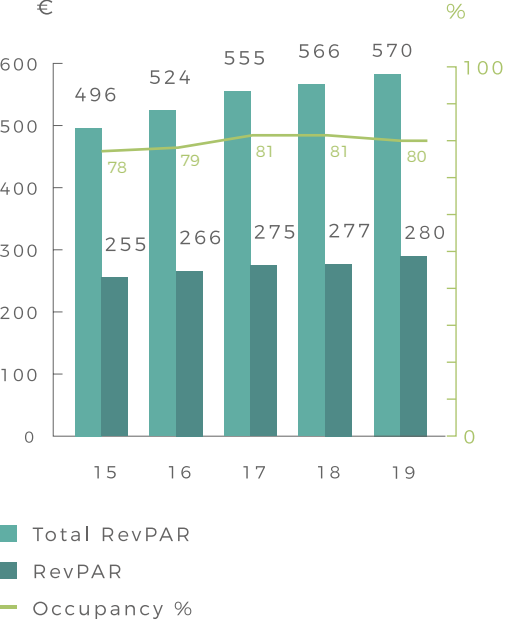
OVERNIGHT GUESTS



TOTAL TURNOVER



OPERATING PERFORMANCE*



* Data refer to Lefay Resort & SPA Lago di Garda

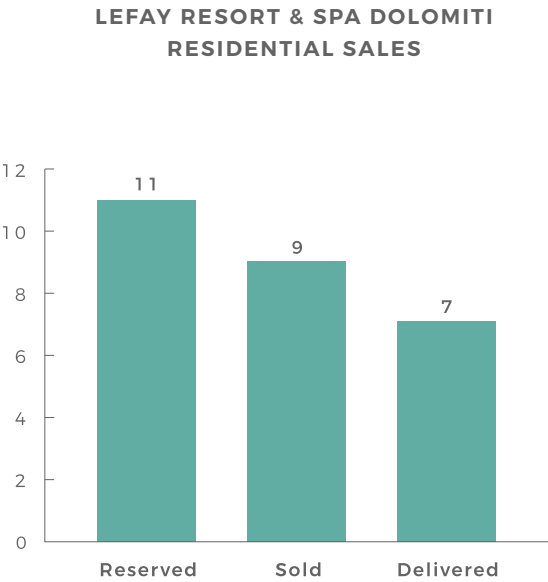


RESIDENTIAL SALES

Lefay Resort & SPA Dolomiti is the first Resort of the Group and the first SPA Destination in Italy offering "Serviced Branded Residences", i.e. luxury residences with integrated hotel services. During 2019, the company began marketing the 21 Residences; 9 Units were sold or subject to preliminary sales agreements, 7 of which were delivered during the year, for a total revenue of € 13,655,000 (of which € 10,419,000 relating to the units delivered).

The average price per square meter realised (€ 10,650 per square meter) is 236% higher than the average price of the location in Pinzolo, TN (€ 4,500 per square meter), demonstrating the premium price brought by the Brand compared to market values.

At the time of writing, 50% of the available units has already been sold.



MANAGEMENT SERVICES



During 2019, revenues from Management Services to third parties amounted to € 381,480 (vs. € 400,000 in 2018); the proceeds are main-

ly related to Project and Technical Services activities for the development of the new Resort in Tuscany and for a project abroad.

STAKEHOLDERS

Lefay oriented its strategies towards a sustainable business model, capable of creating competitive advantages for the company, integrating economic and financial objectives with social and environmental aspects from the beginning. To reach these objectives, it was decided to involve the company's stakeholders, i.e. structuring a Stakeholder Management process consisting of four phases. First, all the company's stakeholders have been carefully identified, in light of their ability to influence and/or be influenced by company activities. Subsequently, a dialogue between the stakeholders and the company was established, through the use of various methods and tools for involvement, such as meetings, questionnaires, events, direct and indirect feedback

analysis, etc. Through the involvement process it was possible to know and analyse the expectations of stakeholders (interests, needs, perceptions, critical issues, etc.). The first three phases of the Stakeholder Management process actively support the creation of social value: Lefay integrated what emerged from the analysis and involvement of stakeholders in the development of its corporate policies and operational actions. These policies and actions aim to strengthen the company's competitiveness by promoting the issues emerged, such as the protection of the environment, the development of local communities, the creation of shared value.

STAKEHOLDER MANAGEMENT PROCESS



IDENTIFICATION

Through a series of focus groups attended by members of the Executive and Management of the Lefay group, company stakeholders were

identified, and subsequently classified according to their ability to influence and/or be influenced by company activities.

INFLUENCE/INTEREST MATRIX FOR THE STAKEHOLDERS' IDENTIFICATION










INVOLVEMENT

Secondly, the company has actively worked to establish relations and a continuous dialogue with its stakeholders thanks to tools

and methods of involvement such as, meetings, surveys, events analysis of direct and direct feedbacks.

METHODS OF INVOLVEMENT OF STAKEHOLDERS AND MAIN TOPICS

STAKEHOLDER	INVOLVEMENT METHOD	MAIN TOPICS
 GUESTS	<ul style="list-style-type: none">• Satisfaction survey	<ul style="list-style-type: none">• Guest Satisfaction• Sustainability policy adopted by Lefay
 AFFILIATES & PARTNERS	<ul style="list-style-type: none">• Fam Trip• Showcase, Workshop e Sales Call• Marketing promotion materials	<ul style="list-style-type: none">• Promotion of local heritage• Guest Satisfaction• Sustainable practices adopted by Lefay
 STAFF	<ul style="list-style-type: none">• Employee satisfaction survey• Annual meeting for the evaluation of results• Development of the career development plan	<ul style="list-style-type: none">• Sustainability policy adopted by Lefay• Compensation & benefits• Professional development• Health and safety in the workplace• Training
 SUPPLIERS	<ul style="list-style-type: none">• Meetings to discuss the principles and criteria of the supply chain• Drawing up of agreements with local producers	<ul style="list-style-type: none">• Sustainability policy adopted by Lefay• Economic performance• Eco-efficiency• Certifications• Organic productions / products• Water savings• Environmental protection• Protection of biodiversity• Quality of products• Safety and Security of supply
 MEDIA	<ul style="list-style-type: none">• Stays at the property• Sending information• Organization of interviews	<ul style="list-style-type: none">• Eco-sustainable tourism• Sustainability policy adopted by Lefay• Promotion of local heritage (cultural, historical, environmental, etc ...)• Sponsorship of local initiatives (cultural, sporting, etc.)
 LOCAL COMMUNITY	<ul style="list-style-type: none">• Membership of Local Associations	<ul style="list-style-type: none">• Impact on the local community (positive and negative)• Acquisition & Retention of local talent• Promotion of local heritage (cultural, historical, environmental, etc.)• Development of local communities• Sponsorship of local initiatives (cultural, sporting, etc.)
 SHAREHOLDERS	<ul style="list-style-type: none">• Shareholders' annual meetings	<ul style="list-style-type: none">• Economic performance• Efficiency and eco-efficiency• Risk assessment and monitoring• Reputation










EXPECTATIONS ANALYSIS

Thanks to the involvement process, Lefay has managed to better understand and analyse the

stakeholders’ expectations (interests, needs, perceptions and difficulties etc...)

STAKEHOLDERS' EXPECTATIONS ANALYSIS

STAKEHOLDER	EXPECTATIONS
 GUESTS	<ul style="list-style-type: none">• Excellence of service offered• Privacy
 AFFILIATES & PARTNERS	<ul style="list-style-type: none">• Commitment to complying with the standards and to fulfil specific requests• Data from clear sources, preferably certified by third parties• Continual improvement of the company's economic performance
 STAFF	<ul style="list-style-type: none">• Improvement of information, communication and consultation between departments to gather new inspiration and ideas• Professional training and growth
 SUPPLIERS	<ul style="list-style-type: none">• Increase in turnover of local suppliers• Development of the partnership to foster the search for new products and therefore new business opportunities.
 MEDIA	<ul style="list-style-type: none">• Constant and transparent communication.• Participating in meetings and educational initiatives to raise awareness of the Lefay Experience and to promote the territory's landscape and cultural heritage known
 LOCAL COMMUNITY	<ul style="list-style-type: none">• Motivated economic development of the area• Respect for the environment
 SHAREHOLDERS	<ul style="list-style-type: none">• Creating profit by increasing the social and environmental value generated by the activities performed• Transparency in external relation

IDENTIFICATION OF COMPANY GOALS

Lefay integrated everything that came out from the process of the stakeholders’ involvement in

its company policies and operations, aiming to strengthen the Group’s competitiveness.

IDENTIFICATION OF COMPANY GOALS, POLICIES AND ACTIONS

STAKEHOLDER	GOALS	POLICIES AND ACTIONS
 GUESTS	To offer them a precious experience, combining the high quality of products and services with the chance of knowing more about wellness and high-end sustainable hospitality.	<ul style="list-style-type: none">• Promoting the excellence of services• Constantly monitoring quality• Adopting innovative solutions integrating excellence and sustainability• Promoting privacy respect
 PARTNERS AND AFFILIATIONS	To give them the chance to increase their skills and professional attitude through the offered services.	<ul style="list-style-type: none">• Increasing the commitment towards the observance of standards and the fulfilment of specific requests• Committing in the supply of data from transparent sources, preferably provided by third certified parties• Aiming at the constant improvement of the company's economic performance
 STAFF MEMBERS	To give the opportunities of personal growth and development of new skills, through numerous training activities, aiming at teamwork and enhancing individual skills and creativity.	<ul style="list-style-type: none">• Aiming at increasing the exchange of information and dialogue among departments to collect new ideas• Promoting training and professional growth through new paths
 SUPPLIERS	To let them benefit from the advantages coming from the reputation and the green identity of the property	<div>Increasing the revenue of suppliers' sales</div> <ul style="list-style-type: none">• Developing partnerships to endorse the research f new green products
 MEDIA	To offer them the tools to understand the value of products and services delivered by the company, expressing a combination between high quality and corporate responsibility	<ul style="list-style-type: none">• Promoting the constant transparent and detailed communication• Inviting selected journalists to experience both the Lefay philosophy and the natural and cultural beauties of the territory
 LOCAL COMMUNITIES	To let it benefit from visibility and concrete support for cultural and sustainable initiatives	<ul style="list-style-type: none">• Promoting the social and economic development of the area• Promoting the respect for the environment and local beauty
 SHAREHOLDERS	To let them benefit from an increase of economic, social and environmental value create by the company's activity	<ul style="list-style-type: none">• Aiming at improving the company's economic performance• Aiming at the creation of profit through the valorisation of the social and environmental patrimony• Adopting transparency as basic principle

MATERIALITY

PROCESS TO DETERMINE MATERIALITY

The materiality of the aspects taken into account in reporting system is the result of the following process: identification, assessment and allocation of the priorities of sustainability issues which significantly influence the company’s ability to create value in the short, medium and long-term. Lefay Resorts structured a process starting with the identification of the main issues for the company business, carried out by the Lefay Management. Then the determination of the material themes is integrated with the analysis of the data concerning:

Guests’ satisfaction and suggestions: Lefay Resorts receives feedback from its Guests by emailing a survey to those who agreed to participate. The objective is to identify relevant themes which are important to the creation of value and to assess the extent to which sustainability is integrated into corporate processes and understood by Guests.

Staff’s satisfaction and suggestions: Given the importance of the Staff in the hospitality industry, Lefay Resorts believes it is important to receive direct feedback from its employees to identify relevant issues and the effectiveness of integrating sustainability into business processes in order to create value. These data are collected annually through an internal survey.

The development of the local community:

Lefay has established a continuous dialogue with the Local Community in order to promote its social and economic development. For this very reason, Lefay constantly monitors how much and in which areas the integration of sustainability in business processes favours or can favour the sustainable development of the Local Community, thereby identifying the relevant issues.

The emergence of particular environmental, economic and social problems:

In the materiality process, all issues related to the emerging at local, national and international level of particular environmental economic and social problems, have been considered.

The adoption of new environmental, economic and social standards:

In the materiality process, all issues related to the adoption at local, national and international level of standards, guidelines and agreements that set new objectives in the environmental, economic and social fields have been considered.

Following the identification of the relevant issues, relative importance has been attributed by assessing the significance of economic, environmental and social impacts and influence on stakeholders assessments and decisions.



HIGH RELEVANCE

BRAND VALUE AND REPUTATION

High relevance from the point of view of economic impacts and strong influence over the assessments and decisions of Shareholders, Guests and Employees.

CORPORATE RESPONSIBILITY

High relevance from the point of view of economic, environmental and social impacts and strong influence over the assessments and decisions of Shareholders and the Local Community, Affiliates and Partners, Media and Guests.

ENHANCEMENT OF HUMAN RESOURCES, STAFF’S TRAINING, INTERNAL COMMUNICATION AND CLIMATE High relevance from the point of view of social impact and strong influence over the assessments and decisions of Employees and Guests.

STAFF’S HEALTH AND SAFETY

High relevance from the point of view of social impacts and strong influence over the assessments and decisions of Employees, Shareholders and the Local Community.

DIALOGUE WITH STAKEHOLDERS

High relevance from the point of view of economic, environmental and social impact and strong influence over the assessments and decisions of all Stakeholders.

LOCAL SUPPLY

High relevance from the point of view of economic, environmental and social impacts and strong influence over the assessments and decisions of Suppliers and the Local Community.

INCOME AND JOB CREATION

High relevance from the point of view of economic impact and strong influence over the assessments and decisions of the Local Community, Shareholders and Employees.

COMPLIANCE WITH REGULATION IN FORCE AND CRIME PREVENTION

High relevance from the point of view of economic, environmental and social impact and strong influence over the assessments and decisions of all Stakeholders.

ENVIRONMENT AND BIODIVERSITY PROTECTION, EMISSIONS TO THE ATMOSPHERE

High relevance from the point of view of environmental impact and strong influence over the assessments and decisions of Guests, Local Community and Employees.

DEVELOPMENT OF LOCAL COMMUNITY, PROMOTION OF ARTS, CULTURE AND SPORT

High relevance from the point of view of the economic and social impact and strong influence over the assessments and decisions of the Local Community, Guests, Employees and Media.

MEDIUM RELEVANCE

ENERGY EFFICIENCY

High relevance from the point of view of economic and environmental impact and low influence over the assessments and decisions of Shareholders and Local Community, Employees, Memberships and Partners, Media and Guests.

WATER ABSTRACTION, SEPARATE COLLECTION AND REDUCTION OF WASTE PRODUCTION

High relevance from the point of view of economic and environmental impact and low influence over the assessments and decisions of Shareholders and Local Community, Employees, Affiliates and Partners, Media and Guests.

DIVERSITY AND EQUAL OPPORTUNITIES

High relevance from the point of view of social impacts and low influence over the assessments and decisions of Shareholders and Employees.

PRIVACY PROTECTION

Low relevance from the point of view of economic and social impact and strong influence over the assessments and decisions of Guests.

RESPONSIBLE COMMUNICATION AND MARKETING

Low relevance from the point of view of economic, environmental and social impact and strong influence over the assessments and decisions of Guests.

LOW RELEVANCE

VEHICLE TRAFFIC

Low relevance from the point of view of environmental impact and low influence over the assessments and decisions of Local Community, Guests and Suppliers.

HUMAN RIGHTS

Low relevance from the point of view of social impact and low influence over the assessments and decisions of Local Community, Employees and Guests.

During the Management Review, the results achieved in the various topics are analysed. The achievement of targets is constantly monitored by means of audits and data analysis; this allows to intervene with corrective actions during the process if a deviation from the expected results occurs. During the Management

INTELLECTUAL CAPITAL PROTECTION

Low relevance from the point of view of economic impacts and low influence over the assessments and decisions of Shareholders and Employees.

CONTAMINATION OF SOIL AND SUBSOIL

Low relevance from the point of view of environmental impact and low influence over the assessments and decisions of Local Community, Guests, Media, Affiliates and Partners.

Review, also objectives for improvement for the following year are established, which will be put into practice by the Company Managers, through the coordination and supervision of the Quality & Sustainability Manager.

MATERIAL ASPECTS





LEFAY RESORT & SPA LAGO DI GARDA



Lefay Resort & SPA Lago di Garda is located in Gargnano, in the heart of the enchanting and renowned Riviera dei Limoni. It is the first Luxury 5-Star Resort on Lake Garda covering 11 hectares of natural park, surrounded by gentle hills and natural terraces rich in olive trees and woods overlooking the lake

THE RESORT FEATURES:

- 93 Suites divided into five categories:
 - 41 Prestige Junior Suites (50 sqm)
 - 43 Deluxe Junior Suites (50 sqm)
 - 4 Family Suites (73 sqm)
 - 4 Exclusive Suites (83 sqm)
 - 1 Royal Pool & SPA Suite (max 600 sqm)

- 3.800 sqm SPA with:
 - 21 treatment rooms
 - 2 private SPAs
 - 3 heated swimming pools
 - 1 heated salt-water lake pool
 - 3 relaxation areas
 - 6 different kinds of sauna and Turkish baths
 - 1 Fitness Centre with equipped gym and 1 fitness studio
 - Energy-Therapeutic Garden

- 2 Restaurants:
 - La Grande Limonaia
 - Trattoria La Vigna

- 2 Bars:
 - Lounge Bar
 - Pool Bar

- 11 hectar garden for outdoor activities with running and walking trails

- 3 meeting areas with a capacity of 10 to 60 people

LEFAY RESORT & SPA DOLOMITI



Lefay Resort & SPA Dolomiti is situated in the ski area of Madonna di Campiglio, in Pinzolo, the largest town in the Rendena Valley. It is the second jewel of the Collection, set in the splendid scenery of the Dolomites, declared by UNESCO a "World Heritage Site".

THE RESORT FEATURES

88 Suites divided into five categories:

- 51 Prestige Junior Suites (57 sqm)
- 26 Deluxe Junior Suites (57 sqm)
- 5 Family Suites (92 sqm)
- 5 Exclusive SPA Suites (100 sqm)
- 1 Royal Pool & SPA Suite (max 430 sqm)

21 Residences divided into four categories:

- 9 One Bedroom (from 97 sqm)
- 9 Two Bedroom (from 141 sqm)
- 2 Three Bedroom (from 201 sqm)
- 1 Penthouse (278 sqm)

5.000 sqm SPA on 4 levels with:

- 20 treatment rooms
- 2 private SPAs
- 3 heated swimming pools
- 1 heated salt-water lake pool
- 1 Family Sauna
- Fitness Centre with equipped gym and 2 fitness studios

Energy-therapeutic Path with:

- 5 energetic stations crated according to Classical Chinese Medicine
- 5 dedicated relaxation areas
- 9 different kinds of sauna and steam baths

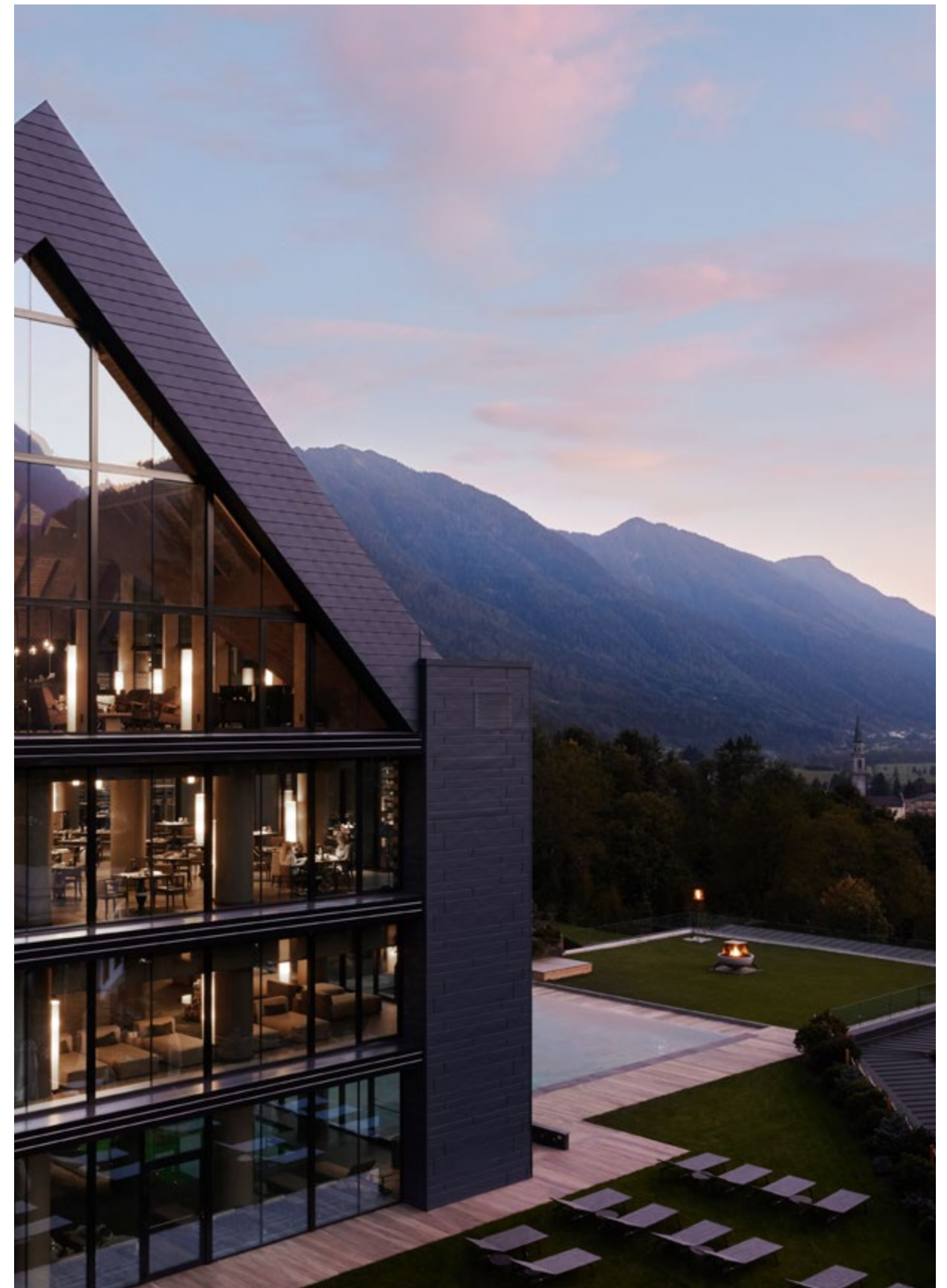
2 Restaurants:

- Dolomia
- Grual

2 Bars:

- Lounge Bar
- Sky Lounge

2 meeting areas with a capacity of 10 to 64 people



LEFAY WELLNESS RESIDENCES



In 2018 the Group officially entered the “Serviced Branded Residences” segment (luxury residences with integrated hotel services), thus becoming the first SPA Destination in Italy to offer this kind of solution. Lefay Wellness Residences are the perfect union of the Brand’s values: new luxury, holistic wellness, sustainability and the exclusivity of 5-star services.

Owners may match the privacy of being at home with all the Resort’s services, including the multi award-winning Lefay SPA, the Lefay Vital Gourmet restaurants, the lounges and the concierge service. The interior design features local materials combined with the uniqueness of the

Made in Italy design and is equipped with low environmental impact technology. In addition to this, Lefay Wellness Residences also represent an investment opportunity that guarantees value over time and offers a range of valuable benefits. Owners can sign up to the Rental Programme, a solution that allows them to make their residence available to the Resort when not in use, thereby receiving the return generated by the sale revenue. This allows Owners to flexibly organise their holidays and, at the same time, maximise the income of their unit, knowing that it is fully taken care of by the Resort Staff and in perfect condition upon arrival.

LEFAY WELLNESS RESIDENCES DOLOMITI



The first Wellness Residences, located within Lefay Resort & SPA Dolomiti, are on sale since July 2018. They are distinguished by precious materials such as oak, local tonalite stone, burnished glass, travertine and fine Italian fabrics. Furniture is tailor-made and mixes artisan expertise with Italian design, creating an environment in harmony with the surrounding mountains. Each single unit has been studied to offer an excellent home experience in full respect of the environment, thanks to building energy class A certification and the use of renewable energy sources

as well as state of the art entertainment technologies. Owners have direct access to the Resort’s facilities from their Residence, among which a 5,000 sqm wellness area (one of the largest Spas in the Alps), two restaurants and other services such as bars, ski & bike room, lounge and Concierge. Residences are available in four categories starting from 97 sqm up to the exclusive 278 sqm Penthouse.

All the details and insights are available on the new website: le fayresidences.com

LEFAY SPA: THE EXCLUSIVE TEMPLE TO HOLISTIC WELLNESS

Innovation, natural spirit and a unique method are the principles of Lefay SPA, a holistic well-being philosophy that focuses on the wellness area, beating heart of every Lefay Property, and extends into every aspect of the holiday: nutrition, harmony with the surrounding environment, certified cosmetic products. A concept that stands out thanks to innovative guidelines that head the Brand towards the creation of a place where East and West blend in perfect harmony with the surrounding environment: the wide surface of the spaces, the sustainable management of the structure, the exceptional comfort of the treatments cabins, the use of the exclusive Lefay SPA Cosmetics Line and the creation of Lefay SPA Method, an innovative wellness method.

LEFAY SPA METHOD

It is the result of studies and research of the Lefay SPA Scientific Committee, composed by medical experts in the various holistic disciplines, and combines Classical Chinese Medicine with Western scientific research. This union is the basis of the Lefay SPA Method Health Programmes offered at Lefay Resort & SPA Lago di Garda, customised according to individual needs, to achieve a complete mental and physical wellness with specific objectives: managing weight, relieving stress, getting into physical shape, treating insomnia, combating the signs of ageing and detoxifying the body.

LEFAY SPA TREATMENTS

Lefay SPA treatments stand out through the Signature treatments that have been created combining traditional massage techniques to stimulate energy points and meridians and are tailor-made for the individual's physical and mental state, for a deep and long-lasting result. Each treatment is listed and described in detail in the Lefay SPA technical protocols, used for the entire staff training process. These include energy massages, energy aesthetic rituals for face and body, and the non-invasive aesthetic medicine treatments.

"TRA SUONI E COLORI" DERMATOLOGICAL COSMETICS LINE

The Lefay SPA cosmetic line was created according to the Lefay SPA philosophy in accordance with the principles of nutricosmetics. Products are without colourings, preservatives and parabens and Vegan OK and Cruelty Free certified. Formulations with a high concentration of antioxidants, vitamins, phyto complexes and organic olive oil allow it to deeply treat the skin's imbalance and guarantee results over time. The 50 individual products, classified into five specific lines (Face and Body, Anti-Age, Cosmos Organic Certified Oils, Men's and Bath) were created with a strong orientation to ethics formalized by the most important international environmental certifications

LEFAY SPA DOLOMITI: THE CONCEPT

At Lefay Resort & SPA Dolomiti the Lefay SPA Method principles may be found within the Energy Therapeutic Path, where the wet area has been created according to the Classical Chinese Medicine Philosophy: the circuits, featuring different levels of temperature and humidity, are personalised on the basis of Guests' individual energy status. From the Centre, the place of connection, Guests may switch to Green Dragon, Red Phoenix, White Tiger and Black Tortoise, the stations where to stop and play in a world of symbolisms where to find the original inner balance.



GREEN CUISINE: LEFAY VITAL GOURMET

“Even food may become food for the soul.”

Food is integral part of a wellness experience, this is why Lefay Vital Gourmet privileges its health aspects combining fresh ingredients with the Chef's creativity. This culinary concept focuses on the Mediterranean Diet in which extra virgin olive oil reigns supreme.

In addition to this, Lefay SPA Menu is the nutritional approach inspired by Lefay SPA Method wellness principles: a tasty, light, detoxifying and healthy way of eating that uses simple ingredients and short cooking times so that the organoleptic qualities of the foods remain unchanged.

THE FIVE PRINCIPLES OF LEFAY VITAL GOURMET CULINARY PHILOSOPHY

MEDITERRANEAN DIET - cereals, fruit and vegetables, fish, meat and low-fat dairy products are the key elements of this diet, enhanced by the use of Lefay extra-virgin olive oil.

SEASONAL NATURE - the ingredients used to prepare the dishes are in harmony with the changing seasons.

ITALIAN SPIRIT - all of our dishes are inspired by local gastronomic excellences and enhance Italian products in a different way.

ETHICS - Lefay Vital Gourmet undertakes not to use endangered animal and fish species in its preparations or products obtained using violent methods.

SUPPLIERS - we privilege local suppliers, preferably suppliers which adopt an organic agricultural production system, consistent with Lefay's philosophy.



GRUAL RESTAURANT

Inspired by an enchanted forest, the brand new gourmet restaurant at Lefay Resort & SPA Dolomiti takes its name from the backdrop mountain of the Resort.

It offers an altimetric menu enhancing ingredients of organic suppliers from Trentino-Alto Adige, available in two different tasting menus, “The Path” and “The Peak”. Here ethic and selected products blend for a culinary emotional experience.

GUEST'S SATISFACTION

As a way to exceed Guests' expectations, Lefay has created a method of service based on combining internationally renowned standards of excellence with an innovative offer that is unique in the industry. It is precisely for this reason that Lefay has chosen to implement a Quality & Environment Management System. This system utilises various tools that each day help to maintain continuous control over the level of quality of the services offered and full compliance with legislation regarding Health and Safety, HACCP and Privacy.

First of all, to verify the level of satisfaction perceived by Guests, a system of measuring customer satisfaction was defined, which was fully computerised to avoid wasting paper. This system enables Guests to assess and give their opinion on various aspects of their stay.

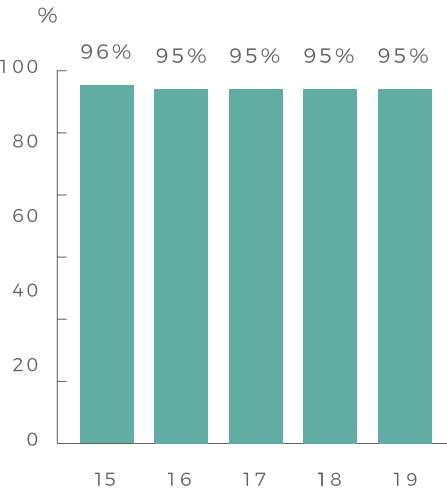
The company undertakes to provide a prompt and timely response to all Guests who ask for a reply. Feedback also comes from Guests by continuously monitoring of comments published on some of the main travel websites, such as Tripadvisor and Booking.com.

Another useful tool for identifying any problems and putting in place improvement actions involves inspections and audits. At the beginning of the year, a monthly schedule is defined. It includes inspections conducted by the Product Manager on the standards of service; inspections conducted by the Quality & Sustainability

Manager, alone or supported by external consultants, to test compliance with service standards, current legislation on Occupational Health & Safety, HACCP, Privacy and simultaneously verify the Quality and Environment System; audits conducted by certification bodies to assess compliance with the requirements of the various schemes; Mystery audits of standards relating to Small Luxury Hotels of the World and Fine Hotels & Resorts affiliations or on Lefay Brand Standards (in the latter case organized by specialised companies appointed by the company itself).

Periodically, all comments submitted by Guests through the different channels available and the results of the inspections are analysed by Senior Management and monitored together with the various departments in order to identify the causes of dissatisfaction and specific criticisms. Through this information management system and thanks to the focus of the company on continual improvement, Lefay Resorts takes specific actions to resolve any problems and continue to maintain high levels of satisfaction of its Guests, creating not just a positive word of-mouth, but also excellent results in terms of loyalty: in fact, for the year 2019 the percentage of repeating Guests was 27%, an increase of 1 percentage point compared to 2018. Lastly, it should be noted that the number of documented complaints during 2019, as well as 2018, regarding breaches of privacy and the loss of consumers' data corresponded to 0.

OVERALL GUESTS' SATISFACTION



Source: Guest' Survey.
Lefay Resort & SPA Lago di Garda

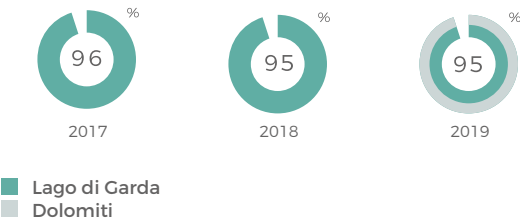
QUALITY CONTROL TOOLS



In 2019, 70 audits were carried out at Lefay Resort & SPA Lago di Garda. In particular:

- 61** Internal Audits: inspections of the Quality and Environmental System; Health and Safety, Privacy and HACCP inspections, product audits
- 5** External Audits conducted by certification bodies
- 2** Mystery Audits on the standards foreseen by FH&R and SLH affiliations
- 2** Mystery Audits on Lefay's standards

WEB REPUTATION



Source: Revinate. The graph shows the average level of satisfaction expressed by the users of the main travel review websites (Tripadvisor, Booking.com, Expedia, etc.).

BRAND COMMUNICATION

Since it was founded, the company has always invested considerable resources in communication, aware of the importance of transmitting its identity to all stakeholders. The strength of the Brand, the properties, the residences, the commitment to sustainability, the concept of holistic well-being and the Italian spirit: all these aspects of Lefay Resorts & Residences are periodically widespread through online and off-line actions, planned each year thanks to a dedicated communication strategy, outlined by the Communication department and the General Management. This process is carried out in the key reference markets, thanks to the collaboration with prestigious PR and press agencies in Italy, United Kingdom, Germany-Austria-Switzerland and Russia.

OFFLINE COMMUNICATION AND PUBLIC RELATIONS

A great attention is devoted to press relations, a precious channel to promote the Brand's services and products and convey the main values of the Company, such as in particular the identity of the territory and the wonderful locations in which the Properties are set. Journalists from all origin markets are involved in each project through the organisation of events, press calls, meeting with the main editorial personalities of publishing groups and, above all, invitations of selected writers specialised in the branches of luxury, wellness and sustainability. The aim is making them live the Lefay experience and let them tell about it in first person. In 2019 alone,

a total of 857 articles were published (30% more than in 2018). The figure is broken down by main market as follows: 446 articles for the Italian media; 144 for the German, Austrian and Swiss media; 107 for the UK and 160 for Russia and CIS countries.

In addition to this, every year Lefay works for the creation of new promotional materials, with a great attention to green papers and inks and with an increasing trend in becoming paperless. Lastly, a huge effort is made to select and participate in international awards, taking care of the various stages of the application process (application, promotion of votes, nominations, and potential communication of the victory).

LEFAY WEB MAGAZINE

Since 2019 the brand new Lefay Web Magazine is online. The Team periodically publishes informative and promotional contents associated to four categories: wellness & beauty, vital cuisine, sustainability and lifestyle, the main themes of the Lefay philosophy. All articles are written involving the main figures of each department, as well as medical experts and external contributors. A tool which is then promoted on all our social channels and matches with the stories of the Lefay Magazine paper edition, available in all our Suites.

WEB & DIGITAL COMMUNICATION

Lefay Resorts & Residences operates in the main social channels used by the public: here, through an editorial plan that includes content of different nature, the Brand values are strengthened and Guests/ Fans are informed about all product and informative updates. In 2019, the Lefay profile on Facebook achieved more than 57,000 likes (5,000 more than the previous year), while the Instagram account overcame 58,000 followers (approximately the double of the previous year). On the social network Twitter, the profile is followed by more than 1,900 people and on the LinkedIn platform there are more than 4,500 links. These channels and other selected digital platforms are also the focus of promotional campaigns that support the positioning of the website, which is part of the "CO₂ Emission Zero" programme promoted by Rete Clima and aimed at neutralising the emissions generated by the site in relation to the pageview.

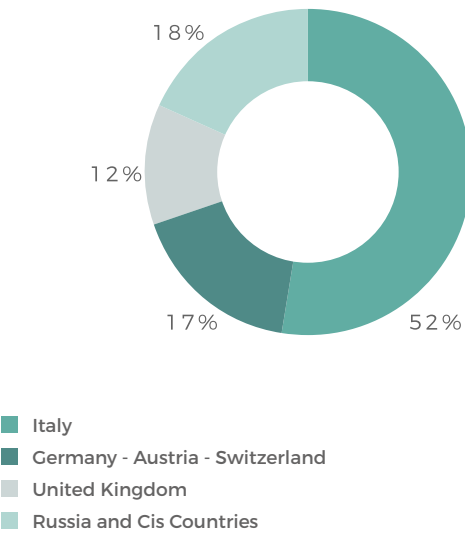
The contents published on the web are also enriched with unedited images taken within the Resort by leading international photographers. To communicate with interested Guests and Users, Lefay sends out newsletters with commercial and informative contents, offering insights published in the Lefay Web Magazine. Over the years, the collaboration with selected web influencers and bloggers, aimed at increasing visibility, has become increasingly important.

ENVIRONMENTAL COMMUNICATION

Consistently with the "Lefay Total Green" project, a series of communication tools have been developed to raise Guest and public awareness of the activities carried out by the company to reduce its environmental

impact and to neutralise its carbon footprint. Among these, the introduction of the "Lefay Total Green" brand on various communication materials (e.g. Brochures, Lefay Club Magazine, etc.) and on the materials used in the Resort. Also, the Green Book has been introduced, an environmental communication tool that each Guest finds in his/her bedroom illustrating the measures being implemented by the Resorts to reduce their environmental impact and invite Guests to contribute personally.

PRESS COVERAGE PER MARKET 2019



In 2019 more than 850 articles were published (+30% vs. 2018) thanks to the intense communication campaign carried out both nationally and abroad.



NEW PROJECTS

LEFAY RESORT & SPA TOSCANA

The third Lefay Resort Property will be set in Tuscany, one of the most picturesque regions in Italy. Consistently with the principles of bio-architecture, the Resort will be perfectly integrated with the surrounding environment, enhancing the beauty of local scenarios, such as the gentle hills and the immaculate green spots. The architecture concept will reinterpret traditional typical elements like terracotta floorings, bricks, plasterworks with earthy nuances and stones.

LEFAY RESORT & SPA LAGO DI GARDA RESTYLING

In the very next future an important refurbishment project will also take place in the first jewel of the Lefay Collection: In addition to the complete renovation of all public areas, three brand new Suites will be created, as well as a new adults wellness area only and a gourmet restaurant.



02

EXCELLENCE IN SUSTAINABILITY

“There are places where the atmosphere is perfect
because the environment is uncontaminated.”

INTRODUCTION



Sustainability means developing a business model that is aimed at achieving financial-economic results, creating “value” and therefore paying greater attention to environmental and social responsibility. A thought that makes explicit the commitment of Lefay towards sustainability and comes to life in the practices with actions aimed at full respect for the environment: bio-architecture and exploitation of renewable energy sources, neutralization of emissions of CO₂, the promotion of the territory and professional development of Staff Members. Principles that guide the Management Company and can be found in the Group’s Resort and Residences, where the new luxury goes beyond ostentation, opulence and aesthetic taste as an end in itself, and instead

is allied to ethical values and a philosophy of holistic wellbeing, according to which the wellbeing of the person cannot overlook the environmental one. At Lefay Resort & SPA Lago di Garda, the first jewel of the collection, luxury and environmental sustainability coexist giving life to a stay characterized by holistic wellbeing. The Resort’s activity has an ecological impact reduced to a minimum. The interventions implemented to achieve this goal are found in a design integrated in the landscape, in a management of the Resort that adopts measures and technologies dedicated to the optimal exploitation of natural resources, in the promotion of Lake Garda and the development of the Staff.

QUALITY & ENVIRONMENTAL MANAGEMENT SYSTEM



The jewel in the crown of the Lefay organisation is the management of the Quality & Environmental System, which delivers an exclusive service that is perfectly aligned with the environmental and quality standards needed to guarantee Guests a unique holiday experience in harmony with nature and the local environment. Right from the design stage Lefay established an integrated Quality & Environmental Management System shared with everyone through clear and precise work tools. Standards and procedures are clearly documented and shared at all levels of the organisation. All employees are given an operational manual illustrating both customer service and environmental procedures and standards. The observance of these standards is verified every day by department heads and periodically during inspections conducted by specially-trained employees or external consultants. Any non-compliance is brought to the attention of the Senior Management and the corrective action needed to definitively solve the issue is decided on together with

the managers in charge. The Quality & Environmental System means Lefay is run in full compliance with the concept of “Continual Improvement”, a concept that lies at the heart of the success of our company. Every year, the Management Review takes place to assess the efficacy of the Quality & Environmental Management System by verifying together with the department Managers, that the objectives defined have been reached, making comments on the results of inspections and defining any corrective actions, preventive actions or opportunities for improvement. Furthermore, a specific position, namely the Quality and Sustainability Manager, was introduced to control the Management Systems, the quality of the processes and the existing environmental projects. This position belongs to the Lefay Resorts Staff and has the task of supporting the Management Company, the Resort General Managers and department Heads in performing their duties in line with the requirements set out in the documents and in the System Procedures.

CERTIFICATIONS

Lefay intended to implement a Quality and Environmental Management System certified according to ISO 14001 and 9001 standards since 2008, for the “design and development of architectural solutions for innovative and environmentally friendly accommodation facilities” and for the management and development processes of hospitality and wellness companies. In the construction of the first Resort, great attention was paid to respect for the surrounding environment through an architectural project fully integrated in the existing landscape, the implementation of cutting-edge technologies that reduce the consumption of energy and water, and the use of clean and renewable energy. These principles have also been the basics of the second Resort project (Lefay Resort & SPA Dolomiti), which obtained the ISO 9001 e 14001 certifications in December 2019 and the prestigious ClimaHotel® certification, attesting green hospitality and tourism.

ClimaHotel® certification has been developed by Agenzia CasaClima, based in the independent province of Bolzano. It issues the guidelines for the sustainability of the project, management and refurbishment stages addressed to hospitality operators. The protocol verifies aspects such as energy efficiency, environmental and water consumption, impact of buildings, conditions of light and sound ambience, air quality, integration and monitoring process of the systems, services aimed at enhancing green mobility and marketing and communication activities highlighting eco themes.

Lefay* Group develops every year an inventory of CO₂ emissions according to ISO 14064 standard and offsets 100% of emissions produced through the purchase of certified emissions credits. Lefay Resort & SPA Lago di Garda has also obtained two other important certifications: Green Globe and Being Organic and Ecological SPA. Globe is issued by the Green Globe certification body, active in 83 countries worldwide. It requires compliance with more than 250 standards relating to sustainability, and it is applicable to companies operating in the tourism branch. Lefay Resort & SPA Lago di Garda was the first Property in South Europe to be certified in 2011 and in 2018 it also acquired the “Gold Status”, for excellent Resorts with at least 5 years of membership.

Being Organic & Ecological SPA is a certification issued by Ecocert, a French certification body. Lefay SPA is the first property in Italy and the fourth in the world to be awarded this new certificate with the Level “Excellence” obtained thanks to three distinctive aspects: the uniqueness of the Lefay SPA Method treatments and health programmes together with the commitment dedicated to training and to the professional development of the Staff; the exceptional comfort of the cabins, which offer Guests an incomparable relaxing experience; the measures put into practice for a sustainable management of the wellness area. To obtain this certification at least 50% of the treatments offered on site must use certified organic cosmetics. These last certifications are planned to be obtained by Lefay Resort & SPA Dolomiti by 2020.

LEFAY RESORTS



ISO 9001 ISO 14001 ISO 14064

LEFAY RESORT & SPA LAGO DI GARDA



ISO 9001 ISO 14001 ISO 14064



LEFAY RESORT & SPA DOLOMITI



ISO 9001 ISO 14001

LEFAY SPA COSMETIC LINE



LEFAY VITAL GOURMET EXTRA VIRGIN OLIVE OIL

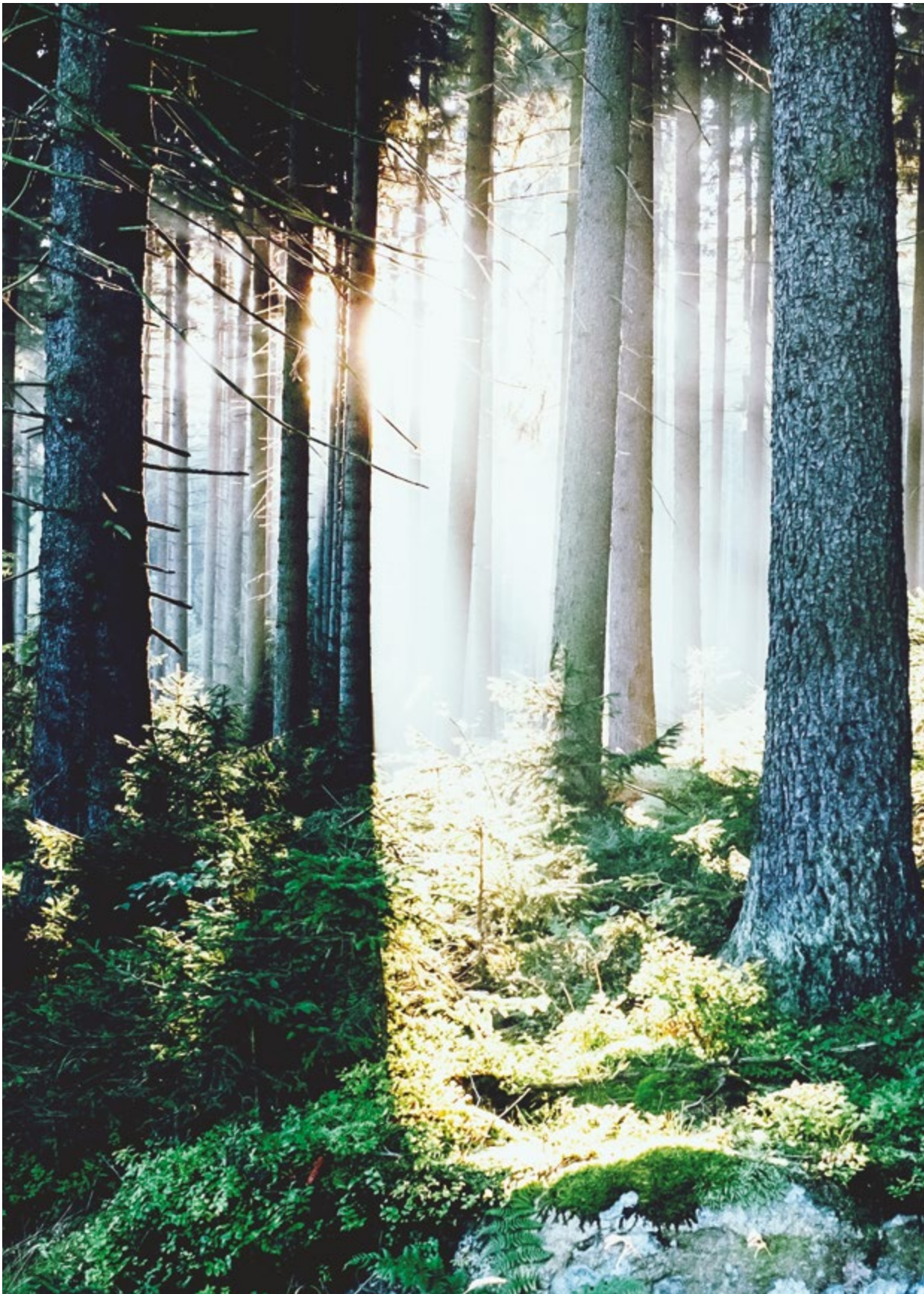


Consistent with the philosophy that distinguishes Lefay, the Lefay SPA Dermatological Cosmetics Line was also designed with a strong focus on ethics and sustainability, as evidenced by the most important international environmental certifications: Vegan Ok certifying the non-use of materials of animal origin or obtained through the exploitation of animals; Cosmos Organic, released for the Lefay SPA line of cosmetic oils, which certifies the observance of the principles of green chemistry and sets the requirements for organic cosmetic products concerning the entire production cycle; Cruelty Free, the international standard “stop testing on animals” guaranteed by the anti-vivisection league and certified by ICEA (Environmental and Ethical Certification Institute); Nickel Tested (less than 0.00001%),

which confirms that all the products are dermatologically tested by Ferrara University and are free from parabens, SLES, colourings, preservatives and added parabens.

Last, Lefay has also certified the production of its own extra virgin olive oil, produced on the morainic hills of the Western Shore of Lake Garda and in the heart of the Tuscan Maremma: the Cuvée and Monocultivar Gargnà oils are certified organic by the CCPB, certification and control body for agricultural and “nofood” products in the field of organic, eco-compatible and eco-sustainable production. The Tuscan oil is recognised by the PGI brand, namely “Protected Geographical Indication”, conferred by the European Union.

*Currently concerns Lefay Resorts S.r.l and Lefay Resort Garda S.r.l (Lefay Resort Dolomiti S.r.l will be included starting from 2021)



ENVIRONMENT



Personal wellbeing should never overlook environmental wellbeing. For this reason, during the design and construction stages of our Resorts, we take into account environmental sustainability, impact on the landscape and clean, renewable energy sources. To achieve this goal, huge efforts are carried out starting from the design stage: focusing on the landscape protection, as well as on the need to create environmentally and energy efficient Resorts, are the first challenge for the Project Team. The properties of the Collection stand in unspoiled settings, characterised by a rich biodiversity and different habitats that host endemic species of international natural importance. Lefay Resort & SPA Lago di Garda is situated in the

“Parco dell’Alto Garda Bresciano”, considered a “protected area” by the Natura 2000 Network, a network distributed throughout the area of the European Union, which was set up according to “Habitat” Directive 92/43/EEC to guarantee the long-term preservation of natural habitats and species of flora and fauna. The second Property is set in the beautiful scenery of the Dolomites, declared by UNESCO a “World Heritage Site”, within the Adamello Brenta Park, the largest protected area in Trentino. It was established in 1967 to ensure the long-term protection of natural habitats and threatened or rare species of flora and fauna.

BIODIVERSITY



Both Properties are located in places with a great biodiversity. Established in 1989, the Alto Garda Bresciano Park occupies an area of approximately 38,000 hectares and includes the territories of the municipalities of Salò, Gardone Riviera, Toscolano Maderno, Valvestino, Magasa, Gargnano, Limone sul Garda, Tignale and Tremosine. Unlike other landscaped parks in perfectly homogeneous areas with a high naturalistic interest, the Garda Park is characterised by strong contrasts in terms of the environment, altitude - from the 65 metres of the lake to nearly 2,000 in the highest mountains (Mount Caplone, 1976 m) - climate and vegetation - from the Mediterranean maquis shrubland to the typical short vegetation of the alpine foothills. Created to ensure the longterm maintenance of endangered natural habitats and threatened or rare species of flora and fauna, the Park is rich in exceptional biodiversity, both plant and animal. As we have already said, it is full of Mediterranean type environmental contexts along the lakeshore with alpine scenarios in the immediate hinterland. Within just a few kilometres we pass from lemon and olive groves, typical Mediterranean

plants, to hornbeam and oak forests, and even higher up to beautiful beech and pine woods. Wildlife too is extremely diversified due to the different environments present in the Park. These include waterfowl such as loons or coots, "woodland" birds such as tits, wood grouse and jays. Mammals are represented by several ungulates: chamois, deer, roe deer and carnivores such as foxes, weasels, martens and wild boars. The most characteristic animals of the Park are insects, the Lepidoptera (butterflies), the 959 species of which account for about half of all those present in Italy. The "UNESCO Global Geoparks" in the Dolomites is covered by hardwood and coniferous forests, such as chestnut, pine, maple and hazelnut trees. There is a huge variety of fauna in the Dolomites, including well-known species and others that are still not so spread. The avifauna comprises over one hundred and thirty types of birds, including golden eagles, capercaillies and white partridges, as well as woodpeckers and owls. Mammals are represented by brown bears, foxes, jackals, hares and various hoofed animals: chamois, roe deers, deers, ibexes and mouflons.

ENVIRONMENTAL IMPACT



ARCHITECTURE AND MORPHOLOGICAL INTEGRATION
Lefay eco-Resorts are not designed as massive buildings, but harmoniously integrated with the territory and adapted to the morphological characteristics of the surrounding landscape. The projects are inspired by traditional constructions, covered with natural materials and marked by the mitigation of the volume impact. Lefay Resort & SPA Lago di Garda re-

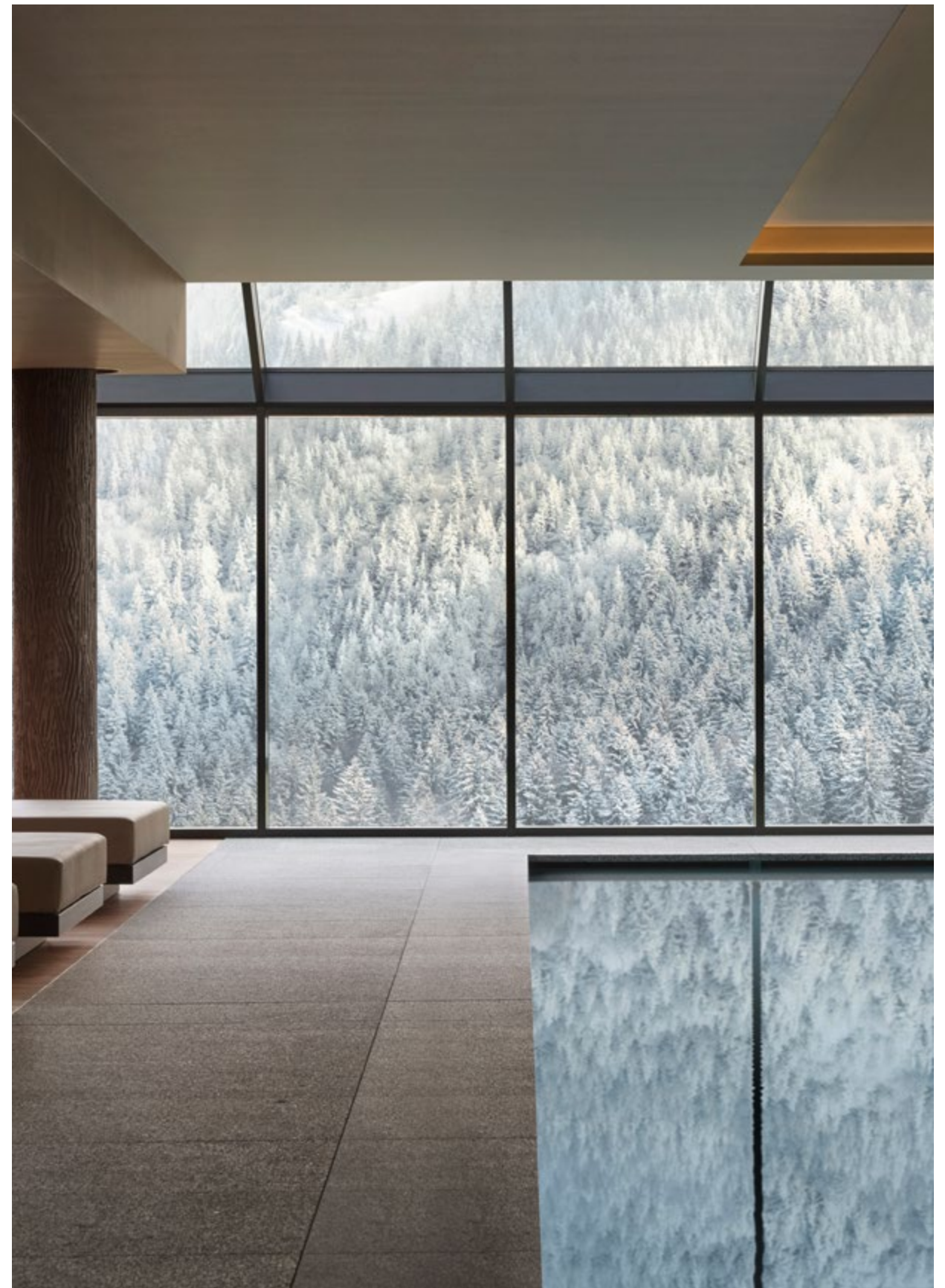
calls the "limonaie" (lemon-houses), typical buildings of the Upper Garda region, which are made of stone pillars and wood and used to cultivate lemons. The property located at the foot of the Dolomites is composed of a central body that represents the iconographic "diamond" element of the Dolomites. The side wings, which hosts the Suites, are completely covered with fir and larch wood.

THERMAL INSULATION

The properties are designed to allow less dispersion of heat and energy towards the outside. Both Resorts, on Lake Garda and in the Dolomites, are facing south and are able to achieve a high level of thermal insulation. At Lefay Resort & SPA Dolomiti, the majority of volumes is placed on staggered planes. All Suites and service-dedicated areas are oriented downstream with large openings that make the most of the natural light. Thanks to their southerly orientation and their windows made of athermic glass, the blocks of rooms and spa area of Lefay Resort & SPA Lago di Garda manage to achieve a high level of thermal insulation: from the cold in winter, through the passive production of solar energy, and from the heat in summer, thanks to mobile system of shading installed on the front part of the balconies. The heating and cooling of the rooms and common areas is achieved through low temperature radiant systems installed within the ceilings and the floors. This system prevents air draughts and noise, thereby ensuring the maximum comfort of Guests.

NATURAL MATERIALS

The respect for the beauty of the surrounding environments is also reflected in the interior design of all destinations, which features natural materials mostly coming from the local area. This is seen in particular in the care given to the selection of materials and furnishings. The materials used in the guestrooms on Garda Lake are olive wood for the parquet floor, Italian walnut for the furniture, red Travertine for entrance floor and bathroom and red Verona marble for sink and tub. Lefay Resort & SPA Dolomiti stands out for its Italian woods, such as oak, and local stone, in particular for the use of tonalite, a typical granitic light-coloured rock of Adamello. All the textiles, including bed linen, are made from natural cotton fibre without any chemical treatments. In addition, the bedlinen has been selected with the GOTS (Global Organic Textile Standard) certificate that attests the composition of the organic fibres and production in compliance with demanding environmental criteria. Chemical-free water paints have also been and are continuously used for the painting operations.





ENERGY

The use of advanced technological solutions that reduce energy consumption gave us the opportunity to combine luxury and all the amenities and services with the utmost respect for the environment. This was made possible by an efficient use of energy and the intelligent utilisation of clean, renewable energy sources. Our commitment to achieving a maximum reduction in environmental impact led our designers to construct the most modern systems for producing electrical energy, heat and air conditioning. The project of Lefay Resort & SPA Dolomiti follows two fundamental design criteria: the containment of the Resort's energy requirements, achieved through the high insulation of all the surfaces of the building cladding and the adoption of ventilation systems with very high energy recovery and the use of renewable energy sources with high performance production systems. The production of thermal energy is mostly delegated to a biomass boiler fed by wood chips, completed by a specific electro-filter for the treatment of fumes that will ensure extremely low emissions that are substantially below regulatory limits. Additionally, a high-efficiency cogeneration plant has been installed to cover the heat and power requirements. At Lefay Resort & SPA Lago di Garda, the technological centre is made up of three fundamental systems:

Biomass System

This system is fed by wood chips and generates thermal energy. This type of plant considerably reduces carbon dioxide emissions and enables the use of local logging waste to be optimised, thereby reducing the environmental impact to a minimum. In 2019, it covered about 38% of the thermal energy consumed.

Microturbine Cogeneration

Gas micro-turbines (entirely replaced in 2016 and 2017) are innovative systems for generating electrical and thermal energy. They are known for their great compactness and high electrical and thermal efficiency; they also have the advantage of having low polluting emissions. They emit few vibrations and operate quietly, also reducing noise pollution. Also in 2019 almost a third (32%) of the total energy consumption has been autonomously produced thanks to cogeneration.

Absorption Cooling

This machine, one of the few examples present in Italy, generates cooling by using the exchange heat of the microturbines and biomass boiler. Tri-generation is achieved with this type of energy generation that is based on co-generation, namely, a single energy source is exploited to generate electricity, heating and cooling. This enables the potential of the plants installed to be fully exploited.



In 2019 the consumption of electric energy was at the same levels of 2017 and 2018, while the consumption of thermal energy (for heating, cooling, hot water production and pools) has increased by 7% compared to 2018. Photovoltaic panels of 11 kw peak output and extremely advanced software help to reduce the amount of artificial lighting when sufficient natural light is available, as well as during night.

In 2019 the total amount of thermal energy used by the Resort has been self-produced; while the self-produced electrical energy – using the cogeneration system and the photovoltaic plant – reached 46% of the needed electrical energy, with an increase of 4 percentage points compared to 2018. The remaining 54% has been purchased from Dolomiti Energia with certificates attesting its 100% origin from renewable energy sources. According to Dolomiti Energia’s data of 2019, Lefay Resort & SPA Lago di Garda was able to avoid the emission of 397,52 of CO₂ in the at-

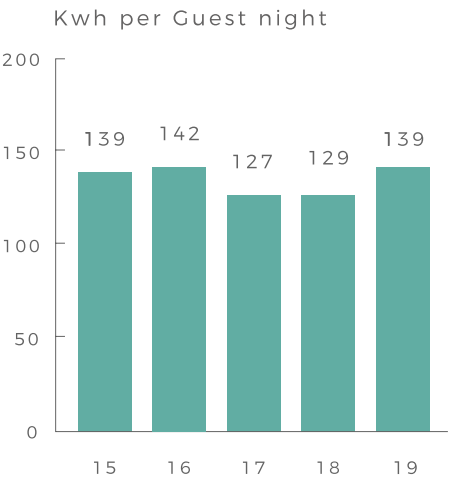
mosphere thanks to its green energy choices. As usual, energy consumption was recorded monthly and shared with the Senior Management through periodical meetings to make comparisons and determine the possibility of direct interventions.

GREEN MOBILITY

In 2019 the collaboration with TESLA and BMW for the promotion of green viability continued (“Tesla Destination Charging” and “BMW I Charge + i Pure Impulse Experience Programme”). Inside the garage two Tesla connectors are available, capable of providing a range of up to 100 km / 60 miles per hour together with a BMW Wallbox for electric cars.

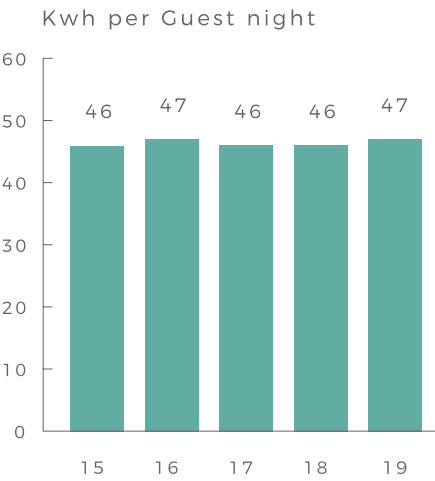
Lefay Resort & SPA Dolomiti has also immediately enhanced sustainable mobility, installing two Tesla connectors and eight universal ones for the electric charge of cars.

LEFAY LAGO DI GARDA
THERMAL ENERGY CONSUMPTION



The analysis of energy and thermal consumption is carried out by taking into consideration, primarily, the indicator of consumption per Guest night. This allows us to understand the effectiveness of the management of energy requirements compared to the level of occupancy of the Resort. In 2019 the consumption figure of thermal energy has slightly increased reaching 139 kwh per Guest night.

LEFAY LAGO DI GARDA
ELECTRIC ENERGY CONSUMPTION



Electricity consumption per Guest is stable; in 2019 it has settled at 47 Mwh per Guest night. Thanks to an analysis of consumption per area, the critical areas where intervention is needed were identified. For the SPA, restaurants and bedrooms areas, a plan was defined to replace the light bulbs with a low-consumption type.

WATER



The concept based on pursuing comprehensive environmental protection is not just limited to the production and use of energy, but also includes water consumption, which is one of the major concerns of the local authority. As a matter of fact, Riviera dei Limoni suffers from water shortages throughout the summer months. The main activities carried out by Lefay Resorts to optimise water consumption are as follows:

RAINWATER COLLECTION

All rainwater falling on the Resort's surfaces is channelled by a dedicated collection system, conveyed to a tank with a capacity of 300 m3 and used to irrigate the gardens.

MANAGEMENT SOFTWARES

To dramatically reduce water consumption from the mains water supply, the water supply system has been calibrated and designed in minute detail. All toilet flushing systems and bath taps regulate the water quantity in output through devices that help save water consumption by 50% compared with standard facilities.

LAUNDRY MANAGEMENT

The laundry is one of the areas where considerable use of both water and energy for drying and ironing of all the Resort's linen is made. The actions taken to reduce this consumption concern raising awareness among Guests and Staff (for example, changing Guests' linen only when they make a specific request).

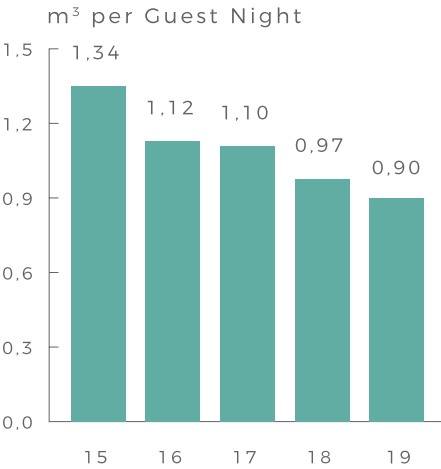
CUNSUMPTION ANALYSIS

Analysis of water consumption is carried out by taking into consideration, primarily, the indicator of consumption per Guest night; this allows us to understand the efficiency in managing energy needs based on the level of occupancy in the Resort. The most critical areas were analysed carefully in 2015 and 2016 to reduce the water consumption and a number of improvement actions were implemented, thanks to the monitoring of flow reducers installed in the points of highest withdrawal. This action produced positive results as water consumption are constantly decreasing and in 2019 at Lefay Resort & SPA Lago di Garda a reduction of 8 percentage points compared to 2018 was registered.

MONITORING WATER DISCHARGES

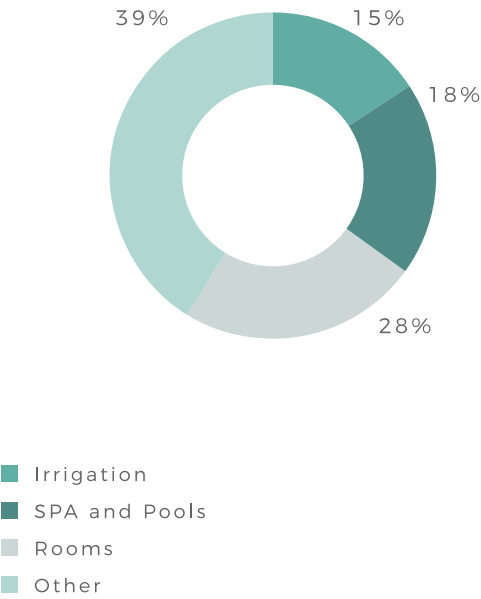
Every year Lefay Resort & SPA Lago di Garda commissions an accredited laboratory to perform analyses every year in order to monitor the values of the discharge water. This enables the environmental aspect to be monitored and to intervene if one or more values exceed the limits.

LEFAY LAGO DI GARDA WATER CONSUMPTION



It must be highlighted how all the swimming pools feature water reintegration regulation directly proportionate to the number of bathers present. This helps the Resort cut water consumption. In 2019 the water consumption per Guest night has significantly decreased, going down m3.

LAGO DI GARDA WATER CONSUMPTION PER SOURCE



WASTE

The management of waste is another key element for reducing the environmental impact of a property which, due to its size and the nature of its activities, produces large quantities of organic and inorganic waste. Lefay reduces the environmental impact of the waste produced by the Resorts thank to the following important actions:

- Separate waste collection;
- Use of recycled materials and re-use of materials;
- Special waste managed correctly.

SEPARATE WASTE COLLECTION

Separate waste collection involves the following types of waste:



In compliance with the collection methods defined by the Municipality of Gargnano (Brescia Province) and Pinzolo (Trento Province), it is applied by the Resort’s Staff according to the standards established by the Quality & Environment Management System. This separation is carried out at source in all areas of the Resort, except in the guestrooms where the waste is separated

in a subsequent stage by the Housekeeping department. The data relating to the production of household wastes have been estimated according to the waste collected by the appointed company and to the number and volume of available containers. For 2019 the max estimated figures for Lefay Resort & SPA Lago di Garda are: Paper and Cardboard 55 tonnes; Plastic 7 tonnes; Glass and metals 24 tonnes; non-recyclable 75 tonnes.

USE OF RECYCLABLE MATERIALS

Consistent efforts have been made to use recyclable and/or biocompatible materials such as:

- FSC certified paper for all materials and paper objects used in the Resorts: writing paper and envelopes for Guests, breakfast forms, badge holders, room directories, menus, spa glasses, shoppers, etc. (FCS is an international certification system that guarantees that the raw material used to make a product in wood or paper comes from forests where strict environmental, social and economic standards are respected).
- glass bottles to limit the use of plastic and an agreement with the supplier to return the empty bottles; total elimination of aluminium cans by all Resort departments with the only exception of the summer pool bar (for safety reasons);
- Biodegradable straws to limit the use of plastic. Lefay Resorts has also been trying to optimise all office processes in order to reduce the unnecessary use of paper as much as possible. Our hotel management software (Property Management System) has enabled

us to reduce paper archives, the paper exchange between the departments, 69 and all paper exchange to Guests all offers and/or order confirmations are made by phone or by email.

SPECIAL WASTE

As regards the management of waste classified as “special”, Lefay works with companies specialised in the transport and disposal of

the same and verifies that they are duly registered in the National Register of Environmental Operators. The main types of special waste are ash, toners and spent vegetable oil. In addition, there is sanitary waste produced by the SPA that is managed as special hazardous waste. At Lefay Resort & SPA Lago di Garda from 2018 to 2019 a strong increase of special waste was recorded (+108%).

TYPE OF SPECIAL WASTER LAGO DI GARDA (T)	2018	2019	VARIATION (%)
Metals	-	-	-
Wood	-	0,950	NOT PRESENT IN 2018
Sanitary Waste	0,019	0,038	100
Ash	2,060	4,400	113
Exhaust toners with hazardous substances	0,021	-	-100
Exhaust toners	0,044	0,009	-80
Neon tubes with hazardous substances	0,020	-	-100
Neon tubes	-	-	-
Frying oil	1,530	2,280	49
Hazardous WEEE equipment out of order	-	-	-
WEEE equipment out of order	-	-	-
TOTAL	3,694	7,677	108

CO₂ EMISSIONS

Since 2011 Lefay Resorts has dedicated great efforts to the issue of CO₂ emissions. In the same year, on 20th December in Rome, the Company signed a voluntary agreement with the Ministry of the Environment and Protection of Land and Sea for the promotion of common projects aimed at assessing the environmental footprint and, in particular, at calculating the carbon footprint and reducing the greenhouses gas emissions. This agreement is divided into two stages:

- STAGE 1:** Definition of the monitoring system of the CO₂ emitted and the respective calculation.
- STAGE 2:** Definition of the actions to reduce and/ or neutralise the CO₂ emitted.

The system of monitoring of emissions and the subsequent definition of the actions needed to neutralise them by 100% led to the launch of the Lefay Total Green project. Since 2015 Lefay has developed an internal calculation system in accordance with ISO 14064.

STAGE 1: DEFINITION OF THE MONITORING SYSTEM OF THE CO₂ EMITTED

The main principles followed for defining the carbon footprint monitoring system are: credibility, transparency and uniformity, in compliance with that envisaged by the ISO 14064 standard. Lefay Resorts does not only analyse direct emissions, but has also quantified indirect emissions, focusing its attention, in particular, on emissions from the transport of Guests, which are particularly significant. The sources of emissions of Lefay Resort & SPA Lago di Garda

have been classified according to the following fields:

- Scope 1:** Direct sources
- Scope 2:** Consumption of electricity and heat purchased (indirect source)
- Scope 3:** Indirect sources

It is common practice for the majority of companies to select a single year in order to report the greenhouse gas emissions. For Lefay 2015 is the base year.

The efficiency of the method used for monitoring CO₂ and the results obtained are validated by the certifying body TÜV SÜD, in full compliance with the provisions of the ISO 14064 standard. This year an update was made of the calculation of the CO₂ emitted, taking into consideration the data of the year 2019: the calculation highlighted an increase of 6% compared to 2018 with a CO₂ emission of 10.287,96 t eq.

The increase was mainly due to the increasing trend of international Guests and, as a consequence, to the increase in the distance covered to reach the Resort on Lake Garda. Even though transport (air transport in particular) produces a lot of CO₂ emissions and represents a significant portion of the total emissions produced, Lefay has no means of influencing it in order to reduce it. Without counting the CO₂ emissions of Guests transportation, the Resort emissions would record a decrease by 0,42% compared to the previous year.



STAGE 2: DEFINITION OF REDUCTION AND/OR NEUTRALISATION ACTIONS OF THE CO₂ EMITTED

After calculating the emissions of CO₂, Lefay Resort & SPA Lago di Garda, by means of the Lefay Total Green project, undertook to offset them by purchasing an equal number of credits on the international market. The first year of compensation was 2013. Compensation is made by discounting the outstanding share of carbon emissions against the purchase of CERs credits recognised by the UN, in compliance with the provisions of the Kyoto protocol to foster the implementation of project aimed cutting CO₂ emissions and other greenhouse gases in both developing and

other countries. To compensate the emissions relating to 2019, Lefay Resorts chose to support four international projects related to CO₂ emissions and to the promotion of social & economic development in local communities.

The first project is "Baspa Hydroelectric" and includes the construction of a hydroelectric power plant to provide renewable energy to local communities in Kuppa, India. The project will produce environmental benefits by reducing emissions and contributing to the conservation of nature reserves and climate change mitigation, reducing dependence on fossil fuels. The main economic-social benefit will be the generation of employment

during both the construction and operational phases. This will help to alleviate poverty and reduce emigration. In addition, the project will improve and increase the number of local infrastructures such as roads, hospitals, schools, etc.

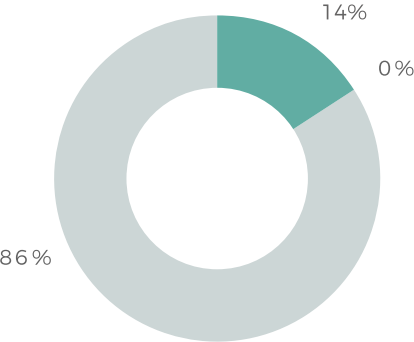
The second ("Süleoğlu Wind Power Plant") and the third ("Balabanlı Wind Power Plant") project involves the construction of a wind farm, the first in Asian Turkey and the second in European Turkey. The projects aim to reduce emissions of greenhouse gases and other pollutants from the extraction, processing, transport and combustion of fossil fuels for the generation of electricity. The projects will help to accelerate the growth of the energy sector and stimulate the production of renewable energy technologies throughout the country. The projects aim to counter Turkey's growing energy deficit and to diversify the electricity generation mix by reducing the gradient from imports, in particular of natural gas. The projects will also provide many social and economic benefits: in the areas around the project sites, in fact, structural work will be carried out to ensure and improve rural development and new job opportunities will be created during the con-

struction and operation of the wind farms. Both projects are Gold Standard certified. The fourth project is "Water is Life" and proposes the construction of a network of 50 wells in Tulear, Madagascar. In this area, 80% of the population has no direct access to drinking water and is forced to make long daily trips to reach water sources. In addition, it is necessary to boil the water using wood or coal to make it drinkable. This generates substantial greenhouse gas emissions and the deforestation of ever larger areas. The project aims to provide drinking water for domestic use, reducing CO₂ emissions, improving hygiene and health conditions and, generally, the quality of life of local people. The project is Gold Standard certified.

In 2019, Lefay confirmed its participation in the DHL GoGreen project, which allowed the Group to neutralise (through certified compensation) the CO₂ emissions into the atmosphere generated by the logistics services required, and in the "CO₂ Emission Zero" program, which is promoted by Rete Clima and allowed the company to neutralise the emissions generated by the site according to the page view.



LEFAY LAGO DI GARDA
CO₂ EMISSIONS PER SCOPE



- Scope 1: Emissions arising from the generation of heat, steam or electric energy by burning fuels.
- Scope 2: Consumption of electricity and heat purchased (indirect source).
- Scope 3: Activities associated to the transportation of Guests, transportation of Staff members and transportation of goods purchased etc... The production of Food & Beverage goods purchased for the Resorts' activities and services; the management of water consumption; the management and disposal of waste.

LEFAY LAGO DI GARDA
EMISSIONS PER SOURCE 2019 VS. 2018

	YEAR 2018	YEAR 2019	DELTA % 2017 - 2018
SOURCE	EMISSIONS [T CO ₂ EQ]	EMISSIONS [T CO ₂ EQ]	[%]
Energy	1,445,18	1,464,25	1,32
Refrigerant gas	-	-	-
Company cars	1,09	1,16	6,88
Staff commute	49,06	52,20	6,39
Raw materials	552,10	535,53	-3,00
Waste	37,60	23,23	-38,22
RESORT TOTAL CO ₂ EMISSIONS	2,085,03	2,076,38	-0,42
Guests' Transport	7,604,48	8,211,58	7,98
TOTAL CO ₂ EMISSIONS	9,689,51	10,287,96	6,18

In 2019 the emissions of CO₂ increased by 600 t. This has been mainly due to the increasing trend of Guests with international origin and, therefore, to the consequential increment in the distance to reach the Resort.





PEOPLE



The key success factor in luxury hospitality is unquestionably the quality of human resources, which allows Lefay to go beyond Guests' expectations every day and to create a unique and valuable offering.

This is the reason why the growth of the Staff constitutes the core of Lefay's values and strategy: it's instrumental in turning our brand into the Italian reference brand in the international market of luxury wellness holiday.

STAFF'S SATISFACTION

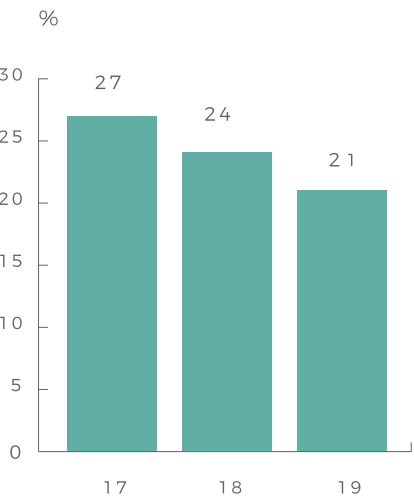
SHARING GOALS

The company's goals, in terms of financial aspects, quality and efficiency, are defined each year, for each department. Meetings of Senior Management, departmental Heads and other Staff are held periodically to monitor the progress of the objectives set out at the beginning of the year, propose new standards of service and solve any problems encountered during daily activities. These meetings help to align the efforts of everyone in achieving the company's strategic goals, strengthening the sense of belonging and fostering Staff management skills.

EMPLOYEES' SATISFACTION

In addition to achieving financial and quality targets, Lefay believes that the level of satisfaction of its Staff is an equally important variable, which should be continuously monitored. For this reason, in 2012 we introduced the "Employee Satisfaction Survey". Once a year all Staff complete the survey, which measures the level of satisfaction in terms of motivation, shared Corporate Values, quality of the Staff canteen and Staff accommodation, opportunities for professional growth and level of transparency in the management of Human Resources. This tool helps the company to achieve three specific benefits: improve communication between manager and Staff, support organisational development and link individual contributions to the realisation of the company's strategic plan. In 2019, the questionnaire has been made online in order to reduce paper waste. Some data arising from an analysis of the results are detailed below: 76% of the Staff has filled and returned the survey in anonymous form, on average 68% were satisfied or very satisfied with their job.

STAFF TURNOVER CORPORATE OFFICE AND
LEFAY LAGO DI GARDA



In 2019 the turnover rate decreased compared to 2018 and remains as usual under the average data of the industry

The areas for which employees have expressed most satisfaction are: their department manager, the training received, their work in general, the benefit of accommodation.

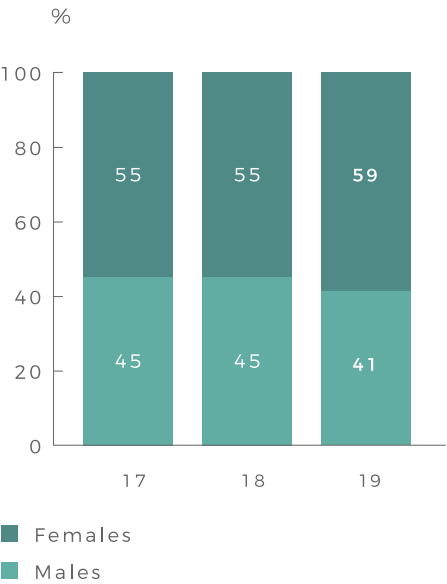
EMPLOYMENT AND REMUNERATION POLICY

All Staff of Lefay Resorts is employed according to the conditions envisaged by the National Labour Contract, Tourism industry. All professional positions in the Resort are grouped into macro-categories, which are based on the employment levels of the National Labour Contract, without discrimination of any kind with regard to gender. Our Staff is paid more than the levels stipulated by the National Labour Contract for the Tourism industry, on average by 10%. In addition to the basic salary, an allowance is given to all those who live a certain distance from the Resort, allowances are provided for particular roles and an incentive system has been set up, which is linked to the objectives shared at the beginning of the year. The 2019 trend in Staff turnover has decreased of 3 percentage points, reaching 21%. Lefay's continuous commitment in reducing turnover rate translates into promotion of numerous activities concerning the professional development of the Staff, the strengthening of the sense of belonging, the sharing of corporate values and the improvement of working environment.

GENDER EQUALITY

The implementation of equality systems is a decisive factor for achieving success and competitiveness within a company. The Lefay Group promotes an organisation based on inclusion and dynamism and ensures that all employees can grow with equal opportunities. In the lesson phase, individual attitudes and experiences are evaluated

MALE VS FEMALE CORPORATE OFFICE AND
LEFAY LAGO DI GARDA



In 2019 the percentage of female Staff has increased up to 59% of the total workforce. Concerning Lefay Dolomiti, the percentage of female Staff in 2019 has been 47%.

independently of the genre, ensuring a fair and meritocratic process, while great attention is paid to creating a balanced working environment in gender representation.

As far as growth is concerned, males and females are equally taken into account for decision-making or high-level roles; in the year 2019, in fact, female employees held more than 70% of managerial positions at Lefay Resort & SPA Lago di Garda and in the Corporate Headquarters, with an increase of 33% in Managers and 1st Level CNL Tourism positions compared to the previous year. In addition, the company has shown great openness towards women who have to combine career progress with events in their private life, such as motherhood or family time in general.

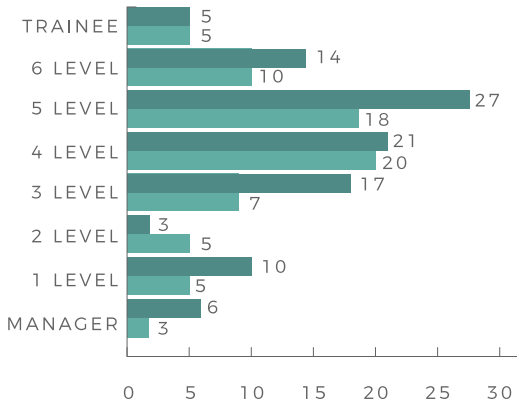
BENEFITS

Based on the assumption that to request superior service from our Staff towards Guests the company must be equally good to its Staff, we have implemented a series of unique benefits in the sector in Italy:

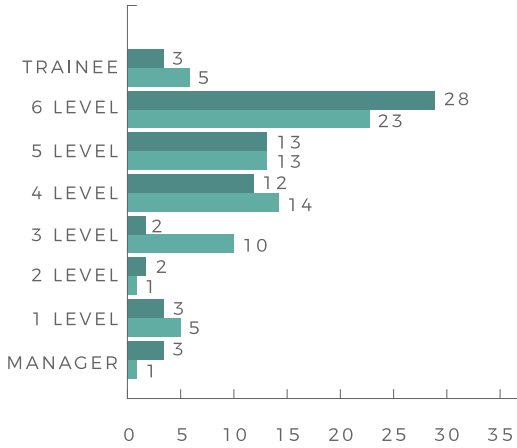
Work hours: the company has drawn up guidelines for work hours so that they are standardised in all departments, sustainable and above all compliant with legislation in the matter.

Holidays: each member of Staff has the right to benefit from the holidays envisaged by the National Labour Contract for the Tourism industry while the Resort is closed and may request another two holiday periods of his/her choice throughout the year.

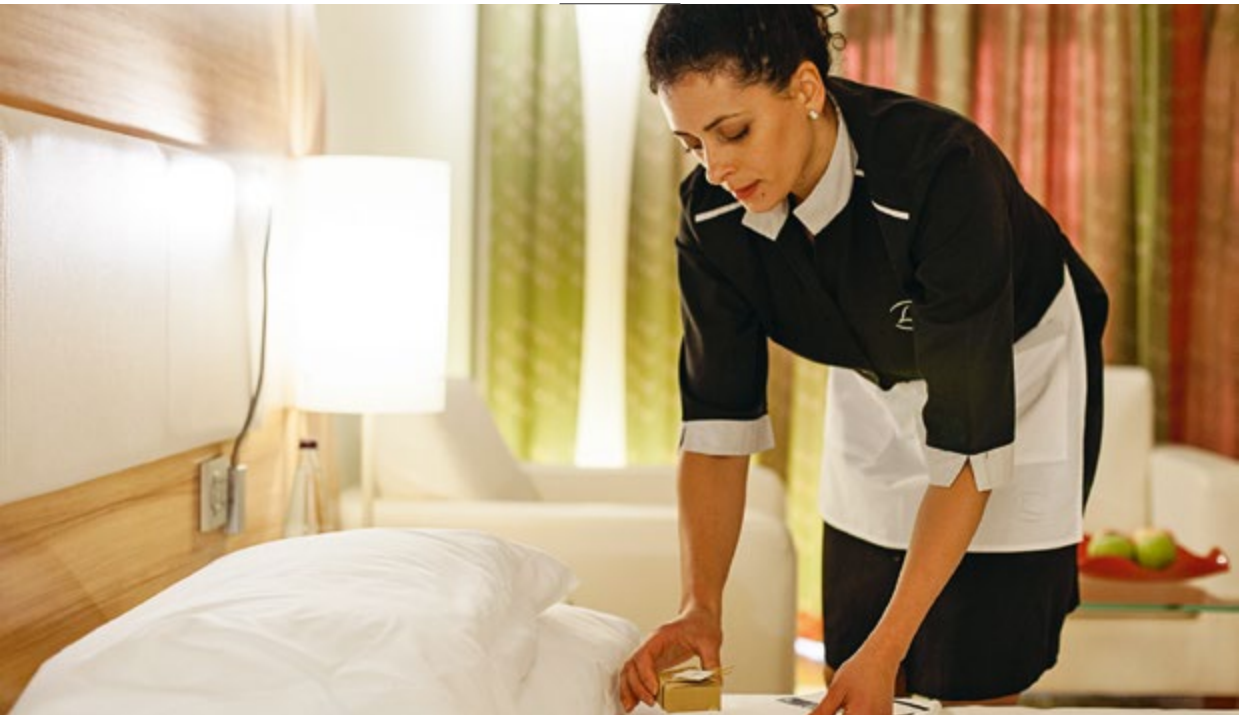
MALE VS FEMALE CORPORATE OFFICE AND LEFAY LAGO DI GARDA



FEMALE/ MALE EMPLOYEES' LEVEL CORPORATE OFFICE AND LEFAY LAGO DI GARDA



■ Females ■ Males



Remuneration: Lefay applies the National Labour Contract, Tourism industry, to all employees, with contractual status linked to their role in the company, on a permanent or temporary basis according to the specific characteristics and requirements of the position available. All aspects of their position (e.g. holidays, days off, shifts) are managed in a clear and transparent manner by the Human Resources Office of the workplace and can be continuously monitored by each member of Staff.

“Noi” Restaurant: all Resorts Staff members can eat free of charge and without limitations at their own restaurant. The “Noi” Restaurant, managed and looked after directly by Lefay Vital Gourmet Staff, offers breakfast, lunch, dinner and afternoon

snacks for the different shifts, allowing all Staff to make use of the service according to the activities and needs of their department with specific attention paid to preparing the menu and its variation following the seasonal changes of the food. For the Staff at the Corporate Offices, since January 2019, the electronic Restaurant Tickets have been introduced to enable and improve lunch break.

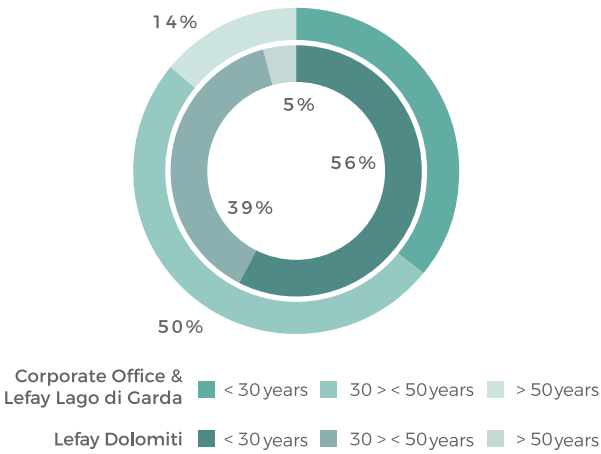
Housing: all Resorts Staff Members are offered housing free of charge within the property or in a special residence. The accommodation facilities have been recently built, are very comfortable and with Wi-Fi connection. Staff not requesting housing will be given a payment in addition to their salary.

Uniforms: when starting their job, each member of Staff is given a set of uniforms for their department. Lefay also offers a free laundry service for the uniforms.

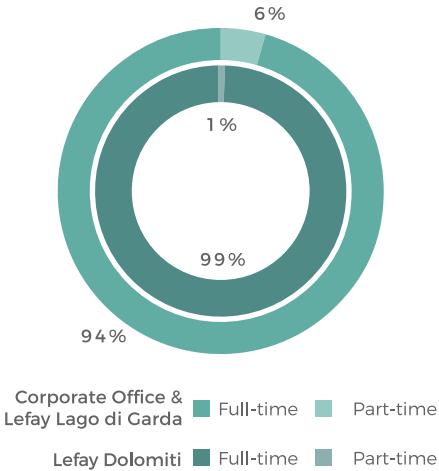
Staff Rate: in 2019 a dedicated and discounted rate on the Resorts stays has been introduced for all Staff members, to be combined with exclusive discounts on SPA and Food & Beverage services. The goal is to offer them the chance to experience a Lefay holiday in first person or share it with the family.

Discounts on purchases of Lefay brand products and services: Lefay Resorts gives discounts to all its Staff on the purchase of stays at the Resorts and on all Lefay SPA, Lefay Style and Lefay Vital Gourmet brand products.

STAFF AGE BY GROUP



FULL TIME VS. PART TIME



PROFESSIONAL DEVELOPMENT

Consistently with the Company's values, Lefay dedicates a great attention to its Staff, especially concerning their professional growth. For this reason, when a new position is needed in the Resort's Team or in the Corporate Office, a careful research among the current Staff Members is carried out before selecting new people. In this way, those human resources that, following a career promotion, could perform the vacant position, may be selected. Lefay Resorts applies, in a clear and transparent manner, the National Labour Contract, Tourism industry, and promotions are given based on merit and skills of each member of Staff. In addition to the roles typical of the sector, the company created specific roles for its requirements, for example:

- Lefay SPA Method Training Manager;
- Lefay SPA Method Trainer;
- Eco-Manager.

For each role a training course is planned and goals, responsibilities and duties are identified and summarised in a job description. The fundamental stages that accompany the path of professional growth within Lefay Resorts are as follows:

- Selection process;
- Performance assessment;
- Recognition.

At Lefay Resorts training is particularly important in the context of professional development.

SELECTION PROCESS

We are always looking to attract the best talents by illustrating the factors that differentiate a work experience with Lefay from other competitors. The section "Careers" on the website lefoyresorts.com allows candidates to view the available positions and examine the benefits offered by the company to its Staff. It is a transparent selection system that increased the influx of highly interesting applications, making the selection process more efficient and simplifying and accelerating the selection management procedure. Furthermore, available positions inside the company are published with dedicated advertisements on the main channels of the HR field such as LinkedIn.

With the new Lefay Resort & SPA Dolomiti opening in 2019, each time a new Staff research is issued, an evaluation among current possible applicants is done before looking for new external figures: it might be possible that aspirants would be glad to work in the new Resort in a position which is aligned to themselves speaking of skills and ambitions.

EMPLOYER BRANDING

To increase professional appeal around the brand among candidates, during 2019 employer branding processes have been endorsed to create awareness, aspiration, emotional engagement and uniqueness towards Lefay as employer company. These actions were made through the participation to recruiting events in several cities, presentations given in professional schools and higher institutes of job specialization and training and creation of partnerships for internships.



The goal is to spread the excellence of the Lefay Brand towards all those who are interested and involved in the hospitality branch and, at the same time, to ensure the valorisation and the full expression of personal attitudes for the success of the company.

PERFORMANCE ASSESSMENT

In order to make the path of growth and development of the Staff clearer and more objective and structured, Lefay Resorts decided to introduce an impartial and objective system of assessment of human resources. All Staff Members are involved in this process, which includes the following stages:

- self-evaluation by each Staff Member;
- evaluation and feedback interview with the Management and the related Head of Department.

During the process the following skills are evaluated:

- "crosscutting", requested for all roles, such as flexibility, motivation, focus on quality;
- "specific", according to the professional role covered, such as linguistic and technical abilities;
- "managerial", only for department heads and deputies.

Also the efficacy of the training activities to which the employee took part during the year is evaluated



ACKNOWLEDGEMENTS

Each month, the Resorts appoint an Employee of the month. With this acknowledgement, recognition is given to employees who manage to surprise Guests by going above and beyond their expectations or who demonstrate total dedication and team spirit while carrying out their work. Financial bonuses are provided for the best performances: these can be granted after an individual evaluation carried out every year from the department Managers, and for them, when reference targets are achieved.

In 2019 a new Welfare Programme has been introduced with the aim of encouraging the Team in completing the targets with the chance of receiving a personal recognition, that might be spent purchasing products or services. The Welfare Programme promotes the individual buying power of the staff members and gives them the possibility to enjoy products and services to satisfy personal or family needs and ensure a level of satisfaction in full balance between professional and private life. In other words, staff members might use their welfare credit to choose favourite services according to what foreseen by current law.

The branches of services that can be purchased are education (e.g. private or public nurseries, public or private schools, universities, MA, courses and languages certifications, school books, playrooms, summer or winter programmes); healthcare (e.g. medical visits or check-ups) and the personal care of family members (e.g. baby sitting, assistance for elder people); general welfare (e.g. pension funds); public transportation; creativity; culture; free time and wellbeing.

In addition to this, throughout 2019 a new system for tips management has been put into practice: tips given by Guests at checks in Bars & Restaurants are formally and equally distributed and issued monthly in staff members' payrolls.

Last, in the same year, the "company anniversary" has started to be celebrated, awarding staff members reaching, in their last working year, the fifth or tenth job recurrence. The awards is usually given in occasion of the final party held before seasonal closing.

INTERNAL GROWTH

With the Lefay Resort & SPA Dolomiti opening, many staff members have been given the chance to participate in the new project following an important personal growth path, with the chance of covering a new and higher position, associated to major responsibilities.

It must be highlighted that more than half of the managerial positions in the new Resort is covered by staff members coming from the Resort based on Lake Garda, who were promoted to play an essential part in the new opening of the second jewel in the Collection, with the advantage of carrying in the new Properties the skills and knowledge learned throughout the years and becoming a reference in the new Team.

INTERNAL COMMUNICATION

Lefay communicates with its Staff in a constant and transparent manner using the following tools:

Corporate Identity Booklet: distributed every year to all Staff, it explains the company's vision, mission and values, the Lefay code of excellence, awards and acknowledgements.

Company Bulletin Board: here the main articulated of the national and international press are displayed, as well as the "Employee of the month" acknowledgement.

Internal communication: any updates on product standards or changes in internal procedures are communicated to the Heads of department and then shared with all Staff.

Periodic meetings: both departmental and cross-cutting meetings are held periodically to discuss news, events and the running of the Resorts.

Institutional communication: the Management of Lefay Resorts issues prompt announcements to let Staff know about any successes (awards or acknowledgements achieved) and any news published in the press thanks to the company's PR work.

Staff Newsletter: news about the Resorts or the company in general are sent via e-mail to all staff members in a dedicated newsletter. They might be related to new accolades, announcements, or benefits.



THE DECALOGUE OF EXCELLENCE

RESPECT FOR COLLEAGUES - we are extremely good to the people we work with, in the same way we are with our Guests, respecting their differences and commending their unique qualities.

COMMUNICATION - we always communicate with a discreet tone and quiet voice, trying never to intimidate interlocutors.

HOSPITALITY - we welcome our Guests as we would if they came to our home.

STYLE - we take care of our appearance, uniform and posture because these aspects are the first expression of Lefay's New Luxury.

EXCELLENCE THAT GOES ABOVE AND BEYOND - we try to anticipate the needs of our Guests and always go above and beyond their expectations!

BEING PROFESSIONAL - we are committed to learning and applying the Lefay standards of excellence.

A SMILE - we express every day the passion, joy and motivation that distinguish us.

RESPECT FOR THE ENVIRONMENT - we are committed to respecting the environment, with small daily gestures.

BEING AN EXAMPLE TO OTHERS - we are aware that any instruction, if not accompanied by example, is useless.

TEAM - we always use the word "us" and never "I", we are successful thanks to the people that stand by our side day after day.

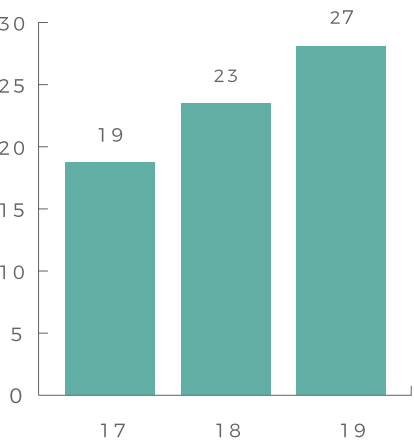
TRAINING

The key to the success of Lefay Resorts is the excellence of people: for this reason, our Staff Members, once they have entered the Lefay world, become part of a Team that is driven and motivated to achieve excellence and have the opportunity to increase their professional preparation and enjoy a series of benefits that are unique in this branch in Italy. Moreover, in occasion of the new opening, the Company has offered the corporate staff the chance to experience a stay at Lefay Resort & SPA Dolomiti in first person, taking advantage of all the Resort services: the SPA world and treatments, the Dolomia restaurant and the Food & Beverage outlets, group activities. An important opportunity that enabled the staff to test the services before welcoming proper Guests and, at the same time, represented a moment of team building and motivation for those who have actively worked for the Lefay Resort & SPA Dolomiti Project. The attitude and skills of our Staff have a direct impact on the excellent quality of the service, which Lefay must ensure is as perfect as possible for our Guests day after day. Lefay training is divided into three categories:

Introductory Course

Each new member of the Lefay Staff goes on an introductory course that lasts some days, so that they can fully embrace Lefay's values, learn their way about the workplace and discover the operational standards expected in their department. An entire module of this programme is dedicated to the facility's sustainability, to the environmental certificates implemented, to the environmental improve-

AVERAGE NUMBER OF HOURS OF TRAINING PER STAFF MEMBER CORPORATE OFFICE AND LEFAY RESORT LAGO DI GARDA



Also in 2019, training hours have risen compared to 2018, going from 23 to 27. It is important to underline that in 2019, the company has significantly increased its investments in the training of Staff. Concerning Lefay Resort Dolomiti, training hours for each staff member counted 80, a number that witnesses the importance given by the company to training, a necessary step to guarantee the excellence in the services offered.

ment objectives and the related actions, and to the good environmental practices to be adopted during everyday work.

Professional Training Courses

During the year each member of Staff also attends special training courses as required (eg. foreign language courses, customer relations courses and management of Guests suffering from celiac disease) in order to develop or improve the specific skills required by their role. In addition to these, other courses are held on specific topics: Occupational Health and Safety, HACCP and Privacy, waste management and management of allergies. Each member of Staff of the SPA department attends a specific training course, which involves the Lefay SPA Director and the SPA Managers, Lefay SPA training coordinators, medical experts and representatives specialised in the various holistic disciplines. Each Staff member is given a training manual, which summarises the theory courses attended, the number of on-the-job training hours carried out to achieve the necessary qualifications to perform treatments on Guests and the assessments given following periodic inspections, which evaluate the level of preparation and respect of Lefay SPA's standards. A professional certificate is given at the end of this course.

Management Courses

Lastly, department managers follow a training path designed to develop their management abilities and the skills needed for achieving success in their role.

FAMILY AND WORK CONCILIATION

Lefay cares about the families of its Employees and has always been active so that they can work in optimal conditions and avoid conflicts with the family related commitments. The success of this approach is demonstrated by the rate of return to work after maternity/paternity leave and the rate of stay at work after returning. In 2019 in fact, all Employees who had taken a maternity/paternity leave in the previous year returned to work (rate of 100%); all Employees are still working at Lefay after one year from their return (rate of 100%).

HEALTH AND SAFETY, PRIVACY, HACCP

Lefay acknowledges great importance to the protection of Occupational Health and Safety, Privacy and HACCP. Its commitment in these three areas has always gone far beyond compliance with legal obligations. Every year, Lefay organises numerous on-site inspections and audits, conducted by experts, during which targeted interviews are held with Employees to identify and assess any new risks/problems/ needs and find the most effective solutions and/or the most appropriate improvement measures. Also with regard to training on Occupational health and safety in the workplace, HACCP and Privacy, Lefay offers its Employees a continuous training, which is customised according to the needs of each department (both in terms of delivery methods and contents).

THE TERRITORY



The environment, climate, vegetation, historical and cultural testimonies and the beautiful landscapes in the background are the distinctive features of the destinations of the Lefay eco-Resorts.

Lefay Resort & SPA Lago di Garda is located on the hills of the historic village of Gargnano, in the heart of the Alto Garda Natural Park, and offers a spectacular view on the largest and most radiant stretch of freshwater in Italy: Lake Garda, also called Benaco.

The Dolomites are internationally recognised thanks to the unique landscape that characterises them and to their scientific geological importance. They are different from other famous mountain ranges because they are composed of nine mountain systems separated by valleys, rivers and other mountains. These systems extend from West to East, from the Brenta Dolomites in Trentino to the Friulane and d'Oltre Piave Dolomites on the border between Veneto and Friuli Venezia Giulia.

SUPPLIES

LOCAL SUPPLIERS

Respect for the value of social and environmental sustainability is also reflected in the Resorts’ purchase policy, which has been focused on environmental sustainability and area provenance ever since the resort opened. In this regard, we give preference to companies which operate according to the standards envisaged by international environmental and quality certification systems. We choose our suppliers on the basis of the criteria listed below in order of priority:

- possession of the necessary mandatory authorisations, licences and/or qualifications;
- possession of specific references and experience and/or experience with eco-compatible projects;
- possession of environmental, quality or product/ service sustainability certifications (and we ask to see a copy just to make sure);
- the supplier’s operating centre to privilege collaboration with local suppliers in order to reduce the impact of transport emissions and to favour the development of the local area;
- cost effectiveness

Lefay Resorts & Residences is committed to developing long-term relationships with its suppliers, also sharing its quality and environmental policy, in the belief that only a relationship involving mutual exchange and growth can ensure the quality of the products proposed to Guests. Furthermore, consistently with the commitment to reduce CO₂ emissions, 60% of

the turnover for food products bought by Lefay Resort & SPA Lago di Garda is provided by local suppliers (which means in the same Resort’s Province or in the ones nearby). The same number for Lefay Resort & SPA Dolomiti is 67%.

SELECTION OF PRODUCTS AND MATERIALS

Respecting the beauty of the surrounding environments, Lefay favours the use of natural, eco-compatible materials.

Interior Design: realised using natural and mainly local materials, such as olive wood for the parquet, Italian walnut for the furniture and Verona red marble for the entrance floor and bathroom at Lefay Resort & SPA Lago di Garda and tonalite (local stone), oak and chestnut wood at Lefay Resort & SPA Dolomiti. All fabrics are made of untreated natural cotton fibre. Water-based, non-chemical paints were also used on the walls.

SPA: we have created a line of personalised dermatological cosmetics for face and body that are rich in natural active ingredients without any addition of petroleum products, artificial colours, parabens and surfactants (sodium lauryl ether sulphate).

Food & Beverage: creation and observance of Lefay Vital Gourmet culinary concept, based on principles such as following the rhythm of the seasons, researching high quality raw materials and enhancing fresh and local ingredients. It privileges the health aspects of food, focusing on Mediterranean diet, in which extra virgin olive oil reigns supreme.



RESEARCH AND DEVELOPMENT

Every year, Lefay invests in research in order to constantly improve its wellness range, innovating products and treatments. This approach is particularly expressed in the Cosmetic Line “Tra Suoni e Colori”, Vegan OK certified, Cruelty Free and, concerning cosmetic oils for face and body, the Cosmos Organic certification, related to the principles of green chemistry. In 2019, the opening of Lefay Resort & SPA Dolomiti has been an incredible input for the

entire Team and, above all, for the Scientific Committee: on the one hand, the creation of new signature treatments has been based on the already existing ones at Lefay Resort & SPA Lago di Garda, awarded by many international accolades. On the other hand, consistently with the Brand philosophy, part of the Lefay Resort & SPA Dolomiti wellness offer has been created from scratch, taking advantage of the power of local nature.

LEFAY SPA DOLOMITI TREATMENTS

The special section “Scents of the Forests” must be highlighted: it combines the wisdom and purity of the alpine nature with the therapeutic properties of the natural products obtained from the forest, water, minerals and plants. The protagonists are horse chestnut and arnica oils enriched with the essences of the forest (mountain pine, swiss stone pine and juniper), mineral alpine salt and traditional butter from the Alps. Last, a special mention goes to the “The Paths of The Black Tortoise”, whose protagonists are the mud created using silt from the Val di Genova, enriched with oligominerals extracted in ionic form: malachite, rhodolite and zincite.

EMPLOYMENT OF LOCAL PEOPLE



Lefay Resorts is committed to employing Staff members who are resident in neighbouring municipalities, depending on the professional skills required. In 2019, the percentage of “local” staff members (coming from the Brescia Province) reached 64%. The commitment of Lefay towards the develop-

ment of the local communities is also seen in the courageous decision to keep its properties open all year round, even in typically seasonal destinations. Concerning Lefay Resort & SPA Dolomiti, the percentage of staff members who live in the Trento Autonomous Province Trento is 55%.

PROMOTION OF LOCAL AREAS



PRESS AND PUBLIC RELATIONS

Thanks to contacts and networks of relationships with international and national representatives, Lefay contributes actively to the development and promotion of the territory, both in Italy and abroad through constant work by teams with prestigious communication agencies in Europe. In 2019, press visits were organised for 88 national and international journalists and more than 850 articles were published relating to the Resorts and the territory, effecting the promotion of culture, tourism and local products.

In particular, throughout 2019 a specific launch plan for Lefay Resort & SPA Dolomiti has been implemented, resulting in significant investments for communication actions both nationally and internationally: launch events held in Milan, London, Munich and Moscow; a dedicated ADV plan for magazines and digital media; invitation to the main journalists with exclusive agreements; press calls with the predominant editorial staff; the creation of promotional marketing material and the set up of the official inauguration day, to which many institutional personalities participated.

ARTISTS

SPONSORSHIPS AND PARTNERSHIPS

Lefay enthusiastically supports some cultural and sporting initiatives promoted by the Local Community, by sponsoring various events. Among these we may find events promoted by local associations, sailing competitions organised every year on Lake Garda or races promoted by local sports clubs. Of interest is the “Transbenaco” regata staged every year by the “Circolo Nautico di Portese”, which regularly receives our support. Remaining in the sports field, contributions are made to several groups in the town of Gargnano. With regards to cultural initiatives, Lefay sponsors concerts and musical events, including the itinerant summer festival “International Chamber Music Festival”, which hosts well-known international musicians from the classical music scene and is held in the most picturesque places on the lake. Of particular importance is the “Festival of Sustainability” organised by the L.A.C.U.S association (Lake, Environment, Culture and History) with the patronage of consortia, institutions, local and supra-municipal authorities. This commitment has also been confirmed with Lefay Resort & SPA Dolomiti, supporting initiatives held in Pinzolo and Madonna di Campiglio. In particular, the Resort contributed to several ski and snowboard groups, as well as local events. Among these, the partnership signed with “Funivie Madonna di Campiglio e Pinzolo” Society and the sponsorship of the winter holiday festival organised by Radio DeeJay must be highlighted. Last, a great attention is dedicated to journalists and web influencers invited to the Resort to get to know the territory while in house.

ASSOCIATIONS

Lefay Resort & SPA Lago di Garda is member of local associations, among which “Consorzio Turistico Gargnano Relax” (Gargnano Relax Tourist Consortium), active in the promotion of tourism in the local area. Moreover, the management company Lefay Resorts is part of “A.I.B - Associazione Industriale Bresciana” (Brescia Industrial Association), one of the most representative business association in Italy and a member of the Confindustria System that numbers more than 1,200 companies. Lefay Resort & SPA Dolomiti confirmed its partnerships with A.P.T Madonna di Campiglio Pinzolo Val Rendena (a special organisation committed to the promotion of the territory) and its affiliation with Trentino Marketing, the society involved in the creation and realisation of projects and initiatives for local development and tourism attractiveness.

CULTURE AND NATURE

The discovery of the territory is an integral aspect of a stay at Lefay. To this regard, numerous experiences are promoted to Guests to discover the main cultural heritage and landscape of the surrounding areas. This is achieved thanks to the organisation of guided visits to the main sites of historical/cultural interest (the “Vittoriale degli Italiani” and the Arena di Verona on Lake Garda; the museums of the province of Trento) and to the sites of naturalistic interest (mountain biking, hiking or trekking in the “Parco dell’Alto Garda” Upper Garda Park or in the wonder of the Dolomites). Both Resorts also offer a selection of leisure activities through collaborations with golf courses, local authorities and associations. The Dolomites in particular, the “UNESCO World Heritage” mountains, are a winter destination renowned all over the world thanks to the beauty of their snowy peaks and glaciers and the reputation of the Madonna di Campiglio ski area.



Lefay aims to involve its Guests emotionally and intellectually in the local area by showcasing local artists. Lefay has developed strong relationships with local artists and commissioned them to produce unique works of art to pay tribute to the wonderful surroundings of the Resorts. Inside Lefay Resort & SPA Lago di Garda, Guests can enjoy some works of art by Renato Missaglia, an artist from Brescia, who has produced art representing the seven elements found in the Garda area: the olive tree, the bougainvillea, the bay tree, the vineyard, the lemon, the lake and the lemon-house. In addition, the Royal Pool & SPA Suite features works of art by Antonio Mazzetti, an eclectic artist from Brescia, while in all common areas of the Resort Guests can enjoy pictures of the lake and the lush lakeside countryside taken by Pino Mongiello.

DONATIONS

Lefay undertakes to support non-profit associations that operate in various fields, including the protection of the Italian natural and cultural heritage, humanitarian assistance to children and their mothers in the poorest areas of the world, the aid and the medical assistance in the countries where the right to health is not guaranteed. Lefay Resorts S.r.l. supports UNICEF (United Nations Children’s Fund) and Doctors Without Borders and it is a Corporate Golden Donor of FAI (Fondo Ambiente Italiano - Italian Environment Fund).



03

IMPROVEMENT OBJECTIVES

“There are places where wellness is everywhere.”

LEFAY RESORT GARDA SRL

ENVIRONMENT

OBJECTIVE	KPI	ACTION	WHEN	STATUS
To reduce the disposable plastic consumption	YES/NO	Introduction of biodegradable and compostable water bottles inJAN 2020 replacements of plastic ones		COMPLETED
To reduce the use of printed materials	N. paper printouts	Introduction of In-room Tablets and reduction of all informational materials in the Suites.	JUL 2020	IN PROGRESS
CO ₂ emissions neutralisation	TCO ₂	Calculation and compensation of CO ₂ emissions through the purchase of green credits	SEP 2020	COMPLETED for the reference year 2019
To reduce the consumption of disposable paper	YES/NO	Introduction of cleanable cups and glasses in replacement of simple paper ones	FEB 2020	IN PROGRESS Postponed to 2021 because of Covid-19 pandemic
To reduce the disposable plastic consumption	YES/NO	Introduction of plastic cups and spoons in hot beverages distributors for Staff	DEC 2020	IN PROGRESS
To reduce the use of printed materials	N. paper printouts	Digitalisation of notification papers for Guests at check-in	DEC 2020	The development of a dedicated software is under research
To reduce the plastic consumption	YES/NO	Introduction of biodegradable straws	JAN 2019	COMPLETED
CO ₂ emissions neutralisation	TCO ₂	Calculation and compensation of CO ₂ emissions through the purchase of green credits	JUN 2019	COMPLETED for the reference year 2018

OBJECTIVE	KPI	ACTION	WHEN	STATUS
To promote various types of local plants	N. of plants market with a little sign / Total number of local plants	To put little signs with names of local plants	DEC 2019	COMPLETED
Decrease of 2% in energy consumption per guest night	KwH Guest/Night	Replacement of light bulbs with low-consumption ones (LED)	DEC 2019	IN POGRESS (progressive relacement)
To promote childrens' awareness of sustainability issues	YES/NO	To come forward with a Green Book for children (types of animals, local plants, duration of waste degradability, etc.)	JUL 2020	IN PROGRESS (along with In-Room Tablets introduction)
To promote the use of electric private means of transport	N. of charging points for electric cars	BMW project aimed at installing one charging point for electric cars inside the Resort garage	JUN 2018	COMPLETED
CO ₂ emissions neutralisation	TCO ₂	Calculation and compensation of CO2 emissions through the purchase of green credits	JUN 2018	COMPLETED for the reference year 2018
To promote company car-sharing	N. persons in each car	To calculate and offset emissions assessing projects for the purchase of CERs	DEC 2018	NOT COMPLETED (the study conducted has shown the impossibility of realising the project)

PEOPLE				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To introduce new benefits for the Staff Members	YES/NO	Introduction of discounted rates for stays and services within the Lefay Resorts	JAN 2020	COMPLETED
To introduce new benefits for the Staff Members	YES/NO	To conclude agreements with local shops and commercial activities for Staff Members ski gondolas and ski equipment rental within Madonna di Campiglio ski area	JAN 2020	COMPLETED
To safeguard the health and safety of Staff against Covid-19	YES/NO	Free screening (serological test and tampon) for all staff members	JUN 2020	COMPLETED
To improve the knowledge of foreign languages	N. of training hours	To schedule foreign languages courses for all staff members	DEC 2020	IN PROGRESS (waiting for the definition of the methods to be adopted against the risk of Covid-19 spread)
To intensify technical-professional training	N. of training hours	To organize specific training courses according to specific tasks	DEC 2020	IN PROGRESS (waiting for the definition of the methods to be adopted against the risk of Covid-19 spread)
To increase awareness of the company objectives and of the enhancement of the individual within the Team	YES/NO	Experimental introduction of a Reward System linked to the Team objectives whit awards in Welfare	MAR 2019	COMPLETED experimentation has involved the SPA department)

IMPROVEMENT OBJECTIVES				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To increase the satisfaction of Kitchen and Bar Staff	YES/NO	Implement a system for the delivery of tips, marked on the Food & Beverage accounts (TIP)	APR 2019	COMPLETED
Increase the efficiency and effectiveness of employees' management	YES/NO	Introduction of a new system for the Staff management	DEC 2019	COMPLETED
Provide useful tools to support leadership capacity for a more efficient Team management	YES/NO	Introduction of management training courses for Department Heads on NLP (Neuro-linguistics Programming)	DEC 2019	COMPLETED
To improve the knowledge of foreign languages	N. of training hours	To schedule foreign languages courses for all staff members	DEC 2019	COMPLETED
To intensify technical-professional training	N. of training hours	To organize specific training courses according to specific tasks	DEC 2019	COMPLETED
To improve the knowledge of foreign languages	N. of training hours	To schedule at least 4 training hours of English for each Member of the Staff	DEC 2018	PARTIALLY COMPLETED
To intensify technical-professional training	N. of training hours	To organize specific training courses according to specific tasks (at least 8 training hours per person)	DEC 2018	PARTIALLY COMPLETED

IMPROVEMENT OBJECTIVES				
TERRITORY				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To collect Guest feedback on the Resort's environmental aspects	YES/NO	To add one question relating to the importance of environmental aspects on the Customer Satisfaction Survey	MAR 2018	COMPLETED
To foster Guests and Staff Members awareness on sustainability issues	YES/NO	To introduce sustainable chocolate of Claudio Corallo production	MAR 2018	COMPLETED Chocolate was introduced: in some dishes available in Resort restaurants and bars; in the Lefay SPA Shop; in the Resort couverture service
To introduce new benefits for the Staff Members	N. of concluded agreements	To conclude agreements with local shops and commercial activities for Staff Members	MAR 2018	COMPLETED

IMPROVEMENT OBJECTIVES				
TERRITORY				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To support local community	N. initiatives/ activities/ projects funded	Financial support to activities and projects struck by the economic crisis due to Covid-19 pandemic	APR 2020	COMPLETED
To support medical and healthcare local staff	Complimentary stays	Complimentary stays offered to healthcare staff who have worked in Covid -19	JUN 2020	COMPLETED
To promote Alto Garda Bresciano Regional Natural Park	N. initiatives/ activities/ projects funded	Financial support to initiatives/ activities/ projects	DEC 2020	IN PROGRESS
To increase the ethical and environmental culture of Guests and Media	N. of concluded partnerships	To conclude partnerships with Italian companies which are attentive to ethical and environmental sustainability	DIC 2020	IN PROGRESS
To reduce environmental impact of washing which involves energy, water and detergents consumption	YES/NO	To introduce in Guestrooms make-up wipes to reduce the intensive washing of linen stained by make-up	DEC 2020	IN PROGRESS
To offer professional opportunities to students and graduates from the local area	N. partnerships	To improve relationships with local schools and institutions educating professional figures of the SPA, Kitchen & Bars and Front Office departments	DEC 2019	COMPLETED
To promote Alto Garda Bresciano Regional Natural Park	N. initiatives/ activities/ projects funded	Financial support to initiatives/ activities/ projects	DEC 2019	NOT COMPLETED

LEFAY RESORTS SRL

ENVIRONMENT

OBJECTIVE	KPI	ACTION	WHEN	STATUS
To increase the ethical and environmental culture of Guests and Media	N. of concluded partnerships	To conclude partnerships with Italian companies which are attentive to ethical and environmental sustainability	DEC 2019	NOT COMPLETED
To reduce environmental impact of washing which involves energy, water and detergents consumption	YES/NO	To introduce in Guestrooms make-up wipes to reduce the intensive washing of linen stained by make-up	DEC 2019	NOT COMPLETED
2% increase of turnover related to the purchase of certified food products	Local supplier turnover / Total turnover	To give priority to the choice of food products with organic certification: Ecolabel, Angelo Blu, EcoCert, Nordic Swan	DEC 2019	NOT COMPLETED (The increase of the use of certified products for the cleaning is not possible)
To increase the percentage of renewable energy	Renewable energy / Total energy consumption	Installation of new solar / Photovoltaic panels	DEC 2019	IN PROGRESS (it is necessary to wait for the extension of the Resort building)
To promote the purchase of local organic, sustainable and/or certified food products in the Resort	YES/NO	To examine the possibility of opening a food Corner/Shop in the Resort with organic, sustainable and /or certified food products	DEC 2018	NOT COMPLETED (the study conducted has shown the impossibility of realising the project)
To promote the sustainable development of the territory	N. sponsorships	To sponsor initiatives/activities/ events aimed at promoting local sustainable development	DEC 2018	COMPLETED

OBJECTIVE	KPI	ACTION	WHEN	STATUS
To reduce the disposable plastic consumption	YES/NO	Introduction of a sweetening system for drinkable water along with personal water bottles for all Staff members, deleting the use of plastic water distributors, plastic glasses and bottles	JAN 2020	COMPLETED
CO ₂ emissions neutralisation	TCO ₂	Calculation and compensation of CO ₂ emissions through the purchase of green credits	SEP 2020	COMPLETED for the reference year 2019
To reduce the disposable plastic consumption	YES/NO	Introduction of plastic cups and spoons in hot beverages distributors for Staff	DEC 2020	IN PROGRESS
To reduce the use of paper	YES/NO	Introduction of a badge for restaurant tickets (instead of using the paper ones)	JAN 2019	COMPLETED
CO ₂ emissions neutralisation	TCO ₂	Calculation and compensation of CO ₂ emissions through the purchase of green credits	JUN 2019	COMPLETED for the reference year 2018
To promote an environmental sustainability culture associated with the world of wellness and cosmetics	YES/NO	To obtain Vegan OK Certification for the new Lefay cosmetic line, which confirms that no animal by-products were used	JUN 2019	COMPLETED

IMPROVEMENT OBJECTIVES				
PEOPLE				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To monitor the production of solar energy	YES/NO	To introduce the use of a software that allows to monitor the production of solar energy	DEC 2019	COMPLETED
To monitor biomass consumption	YES/NO	To introduce the use of a software that allows to monitor the consumption of biomass and make the supplies more efficient	DEC 2019	COMPLETED
To neutralise CO ₂ emissions	TCO ₂	Calculation and compensation of CO ₂ emissions through the purchase of green credits	JUN 2018	COMPLETED for the reference year 2017
To promote sustainable tourism and corporate social responsibility	N. of thesis and dissertations	To help students who attend degree course concerning sustainable tourism and corporate social responsibility to develop their thesis and dissertation	DEC 2018	COMPLETED

IMPROVEMENT OBJECTIVES				
PEOPLE				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To introduce new benefits for the Staff Members	YES/NO	Introduction of discounted rates for stays and services within the Lefay Resorts	JAN 2020	COMPLETED
To introduce new benefits for the Staff Members	YES/NO	To conclude agreements with local shops and commercial activities for Staff Members ski gondolas and ski equipment rental within Madonna di Campiglio ski area	JAN 2020	COMPLETED
To introduce new benefits for the Staff Members	YES/NO	Extension of the Smart Working plan to a larger number of Staff members	FEB 2020	COMPLETED
To safeguard the health and safety of Staff against Covid-19	YES/NO	Free screening (serological test and tampon) for all staff members	JUN 2020	COMPLETED
To improve the workplace conditions	YES/NO	Installation of glass walls in the offices to better organise and divide the desks and improve soundproofing	JUN 2020	COMPLETED
To introduce new benefits for the Staff Members	YES/NO	Introduction of meal vouchers	JAN 2019	COMPLETED
To intensify technical-professional training	N. of training Hours	To organise specific training courses according to specific tasks	DEC 2019	COMPLETED

IMPROVEMENT OBJECTIVES				
TERRITORY				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To intensify technical-professional training	N. of training Hours	To organise specific training courses according to specific Tasks (at least 8 training hours for each Staff Member)	DEC 2018	PARTIALLY COMPLETED
To improve the knowledge of foreign languages	N. of training Hours	To schedule at least 4 training hours of English for each Member of the Staff	DEC 2018	PARTIALLY COMPLETED
To improve the knowledge of foreign languages	N. of concluded agreements	To conclude agreements with local shops and commercial activities for Staff Members	DEC 2018	COMPLETED

IMPROVEMENT OBJECTIVES				
TERRITORY				
OBJECTIVE	KPI	ACTION	WHEN	STATUS
To promote local sustainable development	N. of sponsorships	To sponsor initiatives/activities/ events aimed at promoting local sustainable development	DEC 2020	IN PROGRESS
To support organisations and associations involved in environmental and/or social sustainability	N. of memberships	To support corporate ethical and environmental programmes developed by organisations and associations such as Mediciens Sans Frontieres, FAI, UNICEF	DEC 2020	IN PROGRESS
To promote local sustainable development	N. of sponsorships	To sponsor initiatives/activities/ events aimed at promoting local sustainable development	DEC 2019	COMPLETED
To support organisations and associations involved in environmental and/or social sustainability	N. of memberships	To support corporate ethical and environmental programmes developed by organisations and associations such as Mediciens Sans Frontieres, FAI, UNICEF	DEC 2019	COMPLETED
To increase turnout of local suppliers and products (province of Brescia)	Local suppliers turnout / Total turnout	To give priority, with respect to the purchasing policy management, to the following criteria: · local suppliers of goods; · local suppliers of services	DEC 2018	COMPLETED
To promote local sustainable development	N. of sponsorships	To sponsor initiatives/activities/ events aimed at promoting local sustainable development	DEC 2018	COMPLETED
To support organisations and associations involved in environmental and/or social sustainability	N. of memberships	To support corporate ethical and environmental programmes developed by organisations and associations such as Mediciens Sans Frontieres, FAI, UNICEF	JUN 2018	COMPLETED

AWARDS

LEFAY RESORT & SPA LAGO DI GARDA

2019

INTERNATIONAL TRAVELLER MAGAZINE:
“TOP 10 HEALTH RETREATS AROUND THE WORLD”

Finalist at the Condé Nast Johansens Awards for
Excellence as
“BEST DESTINATION SPA”

Haute Grandeur Global Hotel Awards,
Lefay Resort & SPA Lago di Garda:
“BEST COUNTRY HOTEL”
“BEST ECO FRIENDLY RESORT EUROPE”
“BEST SUITE HOTEL EUROPE”
“BEST HOTEL VIEW IN ITALY”

Haute Grandeur Global SPA Awards, Lefay SPA Garda:
“BEST DESTINATION SPA EUROPE”
“BEST ECO SPA EUROPE”
“BEST HEALTH & WELLNESS SPA ITALY”

Condé Nast Traveller readers’ Choice Awards:
“TOP 30 SPA DESTINATIONS IN THE WORLD”

Wellness Heaven Awards:
“TOP 3 BEST LOCATIONS IN EUROPE”

World Luxury SPA Awards:
“BEST LUXURY ECO-SPA IN SOUTHERN EUROPE”

World Luxury SPA Awards:
“BEST UNIQUE EXPERIENCE SPA”

World Luxury SPA Awards:
“BEST LUXURY DESTINATION SPA” IN ITALY

European Health & SPA Award:
“BEST DESTINATION SPA IN EUROPE”

European Health & SPA Award:
“BEST SIGNATURE TREATMENT”
to “I COLORI DELL’UOMO”

Italian SPA Awards:
“BEST DESTINATION SPA IN ITALY”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 LUXURY HOTELS IN ITALY”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 MOST ROMANTIC HOTELS IN ITALY”

Guida "Ristoranti d’Italia 2019" Gambero Rosso:
"DUE FORCHETTE"
TO RISTORANTE LA GRANDE LIMONAIA

Guida “I Ristoranti d’Italia 2019” L’Espresso:
“PRIMO CAPPELLO”
TO RISTORANTE LA GRANDE LIMONAIA

2018

SLH Awards:
SHORTLISTED FINALIST “MOST SENSATIONAL SPA”

World Boutique Hotel Awards:
“EUROPE’S MOST SUSTAINABLE HOTEL”

World Luxury Hotel Awards:
“EUROPE’S LUXURY ECO RESORT”

Seven Stars Luxury Hospitality and Lifestyle Awards:
SEAL OF EXCELLENCE TO LEFAY SPA

Condé Nast Traveler Readers’ Choice Awards:
“BEST 30 RESORTS IN EUROPE”

Condé Nast Traveller Readers’ Travel Awards:
“TOP 20 SPA DESTINATIONS IN THE WORLD”

World Luxury SPA Awards:
“BEST UNIQUE SPA EXPERIENCE IN SOUTHERN
EUROPE” AND “BEST LUXURY DESTINATION SPA
IN ITALY”

World Travel Awards:
“EUROPE’S LEADING GREEN RESORT”

European Health & SPA Award:
“BEST SPA DESTINATION” AND “BEST SIGNATURE
TREATMENT” TO “IL CERCHIO DELLA LUNA”

World SPA & Wellness Awards:
FINALIST AS “WORLDWIDE HEALTH & WELLNESS
DESTINATION”

Traveller’s World Awards
“FIRST PLACE IN THE TOP 10 SPAS IN THE WORLD”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 LUXURY HOTELS IN ITALY”

Guida “Ristoranti d’Italia 2018” Gambero Rosso:
“DUE FORCHETTE” TO LA GRANDE LIMONAIA
RESTAURANT

Guida “I Ristoranti d’Italia 2018” L’Espresso:
“PRIMO CAPPELLO” TO
LA GRANDE LIMONAIA RESTAURANT

2017

Fondazione Altagamma:
“PREMIO GIOVANI IMPRESE” TO LEFAY RESORTS

World Boutique Hotel Awards:
“WORLD’S BEST WELLNESS SPA”

Small Luxury Hotels Awards:
“MOST SENSATIONAL SPA”

Condé Nast Traveler Readers’ Choice Awards: “TOP 30
RESORTS IN EUROPE”

World Travel Awards:
“EUROPE’S LEADING GREEN RESORT”

World Luxury SPA Awards:
“BEST LUXURY ECO-SPA”

European Health & SPA Award:
“BEST DESTINATION SPA”

Prime Traveller Awards:
“BEST WELLNESS CLINIC”

Tatler SPA Awards:
“BEST FOR EAST-WEST FUSION”

First place in Tripadvisors’
“TOP 10 HOTEL ECOLEADER PLATINUM” IN ITALY
AND EUROPE

Fine Hotels & Resorts by American Express: “MOST
INNOVATIVE SUSTAINABLE HOTEL”

Traveller’s World Magazine:
“TOP 10 DESTINATION SPAS IN THE WORLD”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 LUXURY HOTELS IN ITALY”

Condé Nast Johansens Excellence Awards:
“BEST FOR COUPLES”

Guida “RISTORANTI D’ITALIA 2017” Gambero Rosso:
“DUE FORCHETTE” AND SPECIAL ACCOLADE “GUSTO
& SALUTE” TO LA GRANDE LIMONAIA RESTAURANT

Guida “I RISTORANTI D’ITALIA 2017” L’Espresso:
“PRIMO CAPPELLO” TO LA GRANDE LIMONAIA
RESTAURANT

2016

European Health & SPA Award:
“BEST SIGNATURE TREATMENT” TO “FARFALLA DI
SETA” AND “FLUIRE DEL RUSCELLO”

World Luxury SPA Awards:
“LUXURY DESTINATION SPA IN ITALY”

Connoisseur Circle Hospitality Awards:
“BEST HOSPITALITY SPA HOTEL”

World SPA & Wellness Awards:
“WORLDWIDE HEALTH & WELLNESS
DESTINATION”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 LUXURY HOTELS”

Condé Nast Johansens Excellence Awards:
“BEST SPA FACILITIES”

Guida “I RISTORANTI D’ITALIA 2016” L’Espresso:
PRIMO “CAPPELLO” TO
LA GRANDE LIMONAIA RESTAURANT

ADDENDUM 1
BUSINESS REVIEW
LEFAY RESORT GARDA SRL

2015

Spafinder Wellness Travel Awards:
“COUNTRY AWARDS – BEST SPA IN ITALY”
AND “BEST FOR MIND & SPIRIT”

Spa Traveller Awards:
“BEST SPA RESORT (MORE THAN 50 ROOMS) IN ITALY”
AND “MOST EFFECTIVE DE-STRESS PROGRAMME”

Small Luxury Hotels of the World Awards:
“CLUB MEMBERS’ HOTEL OF THE YEAR”

Condè Nast Traveller Readers’ Choice Travel Awards:
“20 TOP DESTINATION SPA”

European Health & SPA Award:
“BEST DESTINATION SPA”

World SPA & Wellness Awards:
“RESORT SPA OF THE YEAR:
WESTERN EUROPE & SCANDINAVIA”

Condé Nast Johansens Excellence Awards:
“BEST DESTINATION SPA
EUROPE & MEDITERRANEAN”

Tripadvisor Travellers’ Choice Awards:
“TOP 25 HOTELS”, “TOP 25 LUXURY HOTELS”
AND “TOP 25 ROMANTIC HOTELS”

Guida “I RISTORANTI D’ITALIA 2015” L’Espresso:
PRIMO “CAPPELLO” TO
LA GRANDE LIMONAIA RESTAURANT

2014

Condè Nast Traveller Readers’ Choice Travel Awards:
“20 TOP DESTINATION SPA”
AND “WORLD’S BEST 100”

Tripadvisor Greenleaders:
PLATINUM

European Health & SPA Award:
“BEST SPA TREATMENT IN ITALY” TO
LEFAY SPA “LA VITA NEI SENSI”

EXPEDIA® INSIDERS’ SELECT™ 2014 CNN
9 DELUXE WEIGHT LOSS VACATIONS

Tripadvisor Travellers’ Choice Awards:
“BEST LUXURY HOTELS”
AND “MOST ROMANTIC HOTELS”

Trivago Hotel Awards:
“BEST HOTEL IN LOMBARDY”

DATA IN EURO THOUSANDS	2019	2018	2017
REVENUES FROM SALES	17.675	17.633	17.357
Change in inventory of work in progress, semi-finished and finished goods	0	0	0
Increases of fixed assets for in-house works	0	0	0
Other revenues	681	453	271
VALUE OF PRODUCTION	18.356	18.086	17.627
Consumption of raw materials	2.417	2.433	2.589
Costs of services	5.366	5.174	4.907
Rent and leasing expenses	270	238	243
Personnel costs	5.443	5.517	5.347
Other operational costs	13	-35	-143
EBITDA	4.396	4.343	4.088
Depreciation and amortisation	2.452	2.638	2.737
EBIT	1.944	1.705	1.351
Financial income and expenses	420	481	330
EARNING BEFORE TAX	1.524	1.224	1.021
TAXES	620	593	503
NET RESULT	904	631	518

ADDENDUM 2
OTHER DATA
LEFAY RESORT GARDA SRL

TOTAL WORKFORCE	MALE	%	FEMALE	%	TOTAL	%
TOTAL	68	48	73	52	141	100
BY REGION						
EUROPE	61	90	71	97	132	94
ASIA	3	4	1	1	4	3
SOUTH AMERICA	2	3	0	0	2	1
AFRICA	2	3	1	1	3	2
BY EMPLOYEE CONTRACT						
Full-Time	66	97	65	89	131	93
Part -Time	2	3	8	11	10	7
BY EMPLOYEE CATEGORY						
Management	5	7	5	7	10	7
Line Staff	58	85	64	88	122	87
On-Call Workers	4	7	11	17	15	12
Seasonal Workers	1	2	3	5	4	3
Trainees	5	7	4	5	9	6
BY AGE GROUP						
Under 30	28	41	29	40	57	40
30 To 50	32	47	31	42	63	45
Over 50	8	12	13	21	21	15
BY CONTRACT LEVEL						
Managers	2	3	1	1	3	2
1ST level	3	4	4	5	7	5
2nd level	5	7	1	1	6	4
3rd level	6	9	10	14	16	11
4th level	20	29	18	25	38	27
5th level	18	26	21	29	39	28
6th level	9	13	14	19	23	16
Stage	5	7	4	5	9	6
SHELTERED GROUPS						
TOTAL	4	6	2	3	6	4
NEW COLLEAGUES						
TOTAL	30	44	18	25	48	34
BY AGE GROUP						
Under 30	18	60	11	61	29	60
30 To 50	12	40	4	22	16	33
Over 50	0	0	3	17	3	6

ADDENDUM

BY REGION						
EUROPE	23	77	17	94	40	83
ASIA	3	10	0	0	3	6
SOUTH AMERICA	2	7	0	0	2	4
AFRICA	2	7	1	6	3	6
TURNOVER						
MALE	%	FEMALE	%	TOTAL	%	
TOTAL	22	32	14	19	36	26
BY AGE GROUP						
Under 30	10	45	7	50	17	47
30 To 50	12	55	6	43	18	50
Over 50	0	0	1	7	1	3
BY REGION						
EUROPE	19	86	14	100	33	92
ASIA	2	9	0	0	2	6
SOUTH AMERICA	1	5	0	0	1	3
WORK-RELATED INJURIES						
MALE	%	FEMALE	%	TOTAL	%	
TOTAL (days)	-	-	-	-	-	-
WORK-RELATED ILLNESSES						
MALE	%	FEMALE	%	TOTAL	%	
TOTAL (days)	79	75	27	25	106	100
BY REGION						
EUROPE	79	0	27	100	106	100
BOARD OF DIRECTORS						
MALE	%	FEMALE	%	TOTAL	%	
TOTAL	2	67	1	33	3	100
BY AGE GROUP						
Under 30	0	0	0	0	0	0
30 To 50	2	100	0	0	2	67
Over 50	0	0	1	100	1	33
BY REGION						
EUROPE	2	100	1	100	3	100
TRAINING HOURS						
MALE	%	FEMALE	%	TOTAL	%	
TOTAL	1.963	49	2.031	51	3.994	100
BY EMPLOYEE CATEGORY						
Management	223	11	225	11	448	11
Internal Courses	40	18	71	32	111	25
External Courses	183	82	154	68	337	75
Line Staff	1.677	85	1.709	84	3.386	85
Internal Courses	921	55	1.105	65	2.026	60
External Courses	756	45	604	35	1.360	40
Trainees	63	3	97	5	160	4
Internal Courses	24	38	47	48	71	44
External Courses	39	62	50	52	101	63
PROMOTIONS						
TOTAL	8	12	2	3	10	7
BY EMPLOYEE CATEGORY						
Management	0	0	0	0	0	0
Line Staff	8	100	2	100	10	100



ADDENDUM 3
BUSINESS REVIEW
LEFAY RESORTS SRL

DATA IN EURO THOUSANDS	2019	2018	2017
REVENUES FROM SALES	4.902	3.420	3.261
Change in inventory of work in progress, semi-finished and finished goods	0	0	0
Increases of fixed assets for in-house works	0	10	13
Other revenues	36	105	77
VALUE OF PRODUCTION	4.938	3.535	3.352
Consumption of raw materials	552	279	341
Costs of services	1.854	1.527	1.451
Rent and leasing expenses	239	206	175
Personnel costs	1.722	1.092	922
Variations in stocks, subsidiary raw materials and goods	-122	-17	-167
Other operational costs	200	90	66
EBITDA	493	357	564
Depreciation and amortisation	467	442	421
EBIT	27	-84	143
Financial income and expenses	962	1.014	-58
EARNING BEFORE TAX	988	929	85
TAXES	250	143	22
NET RESULT	738	786	63

ADDENDUM 4
OTHER DATA
LEFAY RESORTS SRL

TOTAL WORKFORCE	MALE	%	FEMALE	%	TOTAL	%
TOTAL	5	14	30	86	35	100
BY REGION						
EUROPE	5	100	30	100	35	100
BY EMPLOYEE CONTRACT						
Full-Time	4	80	30	100	34	97
Part -Time	1	20	0	0	1	3
BY EMPLOYEE CATEGORY						
Management	2	40	11	37	13	37
Line Staff	3	60	18	60	21	60
Trainees	0	0	1	3	1	3
BY AGE GROUP						
Under 30	1	20	5	17	6	17
30 To 50	3	60	23	77	26	74
Over 50	1	20	2	7	3	9
BY CONTRACT LEVEL						
Managers	1	20	5	17	6	17
1ST level	1	20	6	20	7	20
2nd level	1	20	2	7	3	9
3rd level	1	20	7	23	8	23
4th level	0	0	3	10	3	9
5th level	0	0	6	20	6	17
6th level	1	20	0	0	1	3
Stage	0	0	1	3	1	3
SHELTERED GROUPS						
TOTAL	1	20	0	0	1	3
NEW COLLEAGUES						
TOTAL	2	40	9	30	11	31
BY AGE GROUP						
Under 30	2	100	4	44	6	55
30 To 50	0	0	5	56	5	45
Over 50	0	0	0	0	0	0
BY REGION						
EUROPE	2	100	9	100	11	100
TURNOVER						
TOTAL	0	0	1	3	1	3

BY AGE GROUP						
Under 30	0	0	0	0	0	0
30 To 50	0	0	1	100	1	100
Over 50	0	0	0	0	0	0
BY REGION						
EUROPE	0	0	1	100	1	100
WORK-RELATED ILLNESSES						
TOTAL (days)	0	0	0	0	0	100
WORK-RELATED INJURIES						
TOTAL (days)	0	0	0	0	0	100
CONSIGLIO DI AMMINISTRAZIONE						
TOTAL	5	83	1	17	6	100
BY AGE GROUP						
Under 30	0	0	0	0	0	0
30 To 50	4	80	0	0	4	67
Over 50	1	20	1	100	2	33
BY REGION						
EUROPA	5	100	1	100	6	100
TRAINING HOURS						
TOTAL	61	8	731	92	792	100
BY EMPLOYEE CATEGORY						
Management	51	84	83	11	134	17
Internal Courses	49	96	18	22	67	50
External Courses	2	4	65	78	67	50
Line Staff	10	16	617	84	627	79
Internal Courses	9	90	518	0	527	84
External Courses	1	10	99	0	100	16
Trainees	0	0	31	4	31	4
Internal Courses	0	0	2	0	2	6
External Courses	0	0	29	0	29	94
PROMOTIONS						
TOTAL	1	20	13	43	14	40
BY EMPLOYEE CATEGORY						
Management	0	0	7	54	7	50
Line Staff	1	100	6	46	7	50

ENVIRONMENTAL PERFORMANCE INDICATORS							
ENERGY	UNIT	2017	%	2018	%	2019	%
Pallet	T	17,18	100,00	49,80	100,00	35,28	100,00
Pallet	T/unit	0,82	-	2,26	-	1,01	-
TOTAL - THERMAL ENERGY	T	17,18	100,00	49,80	100,00	35,28	100,00
TOTAL - THERMAL ENERGY	T/unit	0,82	-	2,62	-	1,01	-
Green energy purchased	Mwh	68,07	91,44	66,14	87,39	68,89	70,00
Green energy purchased	Mwh/Unit	3,24	-	3,01	-	1,97	-
Self-produced solar energy	Mwh	6,37	8,56	9,55	12,61	29,52	30,00
Self-produced solar energy	Mwh/Unit	0,34	-	0,43	-	0,84	-
TOTAL - ELECTRICITY	Mwh	74,43	100,00	75,68	100,00	98,41	100,00
TOTAL - ELECTRICITY	Mwh/Unit	3,92	-	3,44	-	2,81	-
WATER	UNIT	2017	%	2018	%	2019	%
Water withdrawn from the municipal supply network	m³	2.980,00	100,00	2.304,00	100,00	1.227,00	100,00
Water withdrawn from the municipal supply network	m³/unit	156,84	-	121,26	-	35,06	-
WASTE	UNIT	2017	%	2018	%	2019	%
Exhausted toners with hazardous substances (CER 80317)	T	0,06	75	-	-	-	-
Exhausted toners (CER 80318)	T	0,02	25	0,01	100,00	-	-
Ashes (CER 100103)	T	-	-	-	-	1	100,00
CO ₂ EMISSIONS	UNIT	2017	%	2018	%	2019	%
Scope 1	TCO _{2eq}	15,94	43,28	73,67	77,31	28,40	30,73
Scope 2	TCO _{2eq}	-	-	-	-	-	-
Scope 3	TCO _{2eq}	20,89	56,72	21,62	21,62	64,02	69,27
TOTAL	TCO _{2eq}	36,83	100,00	95,29	100,00	92,43	100,00

Ceneri (CER 100103)

CO ₂ EMISSIONS BY SOURCE							
SOURCE	UNIT	2017	%	2018	%	2019	%
Electricity (green energy)	TCO _{2eq}	-	-	-	-		
Thermal energy (pallet)	TCO _{2eq}	1,86	5,05	5,38	5,65	3,81	4,12
Refrigerants (HFC)	TCO _{2eq}	-	-	45,24	47,28	-	-
Company cars	TCO _{2eq}	14,08	38,24	23,05	24,19	24,59	26,61
Waste	TCO _{2eq}	NC	NC	NC	NC	30,11	32,58
Paper	TCO _{2eq}	1,64	4,45	0,38	0,40	0,74	0,81
Personal cars (home to work / work to home)	TCO _{2eq}	0,23	0,62	0,39	0,41	2,89	3,12
TOTAL	TCO _{2eq}	19,02	51,66	20,85	21,88	30,28	32,76
TOTAL CO ₂ EMISSION	TCO _{2eq}	36,83	100,00	95,29	10,00	92,43	100,00

SUSTAINABILITY REPORT IN ACCORDANCE WITH GLOBAL REPORTING INITIATIVE

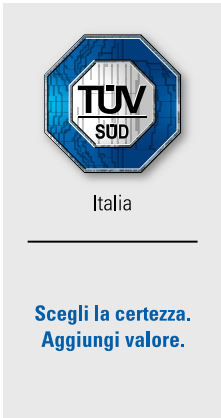
GENERAL STANDARD REPORTING

GRI STANDARD TITLE	NUMBER	TITLE	CORE	REFERENCE	ASSURANCE
GENERAL DISCLOSURES					
General disclosures	102-1	Name of the organisation	X	Our Story	✓
General disclosures	102-2	Activities, brands, products and services	X	Business model	✓
General disclosures	102-3	Location of headquarters	X	Corporate structure	✓
General disclosures	102-4	Location of operations	X	Corporate structure	✓
General disclosures	102-5	Ownership and legal form	X	Corporate structure	✓
General disclosures	102-6	Markets served	X	Business Review	✓
General disclosures	102-7	Scale of the organisation	X	Business Review	✓
General disclosures	102-8	Information on employees and other workers	X	Staff's satisfaction	✓
General disclosures	102-9	Supply chain	X	Supplies	✓
General disclosures	102-10	Significant changes to the organisation and its supply chain	X	Our Story	✓
General disclosures	102-11	Precautionary principle or approach	X	Environment	✓
General disclosures	102-12	External initiatives	X	Promotion of local areas	✓
General disclosures	102-13	Membership of associations	X	Promotion of local areas	✓
General disclosures	102-14	Statement from senior decision-maker	X	Chief Executive Officer's Letter	✓
General disclosures	102-16	Values, principles, standards, and norms of behavior	X	Letter from the founders, Vision & Mission, Corporate values	✓
General disclosures	102-18	Governance structure	X	Corporate structure	✓
General disclosures	102-40	List of stakeholder groups	X	Stakeholder	✓
General disclosures	102-41	Collective bargaining agreements	X	Staff's satisfaction	✓
General disclosures	102-42	Identifying and selecting stakeholders	X	Stakeholder	✓
General disclosures	102-43	Approach to stakeholder engagement	X	Stakeholder	✓
General disclosures	102-44	Key topics and concerns raised	X	Stakeholder	✓
General disclosures	102-45	Entities included in the consolidated financial statements	X	Business model Corporate structure	✓
General disclosures	102-46	Defining report content and topic Boundaries	X	Boundaries of Sustainability Report	✓
General disclosures	102-47	List of material topics	X	Materiality	✓
General disclosures	102-48	Restatements of information	X	Addendum	✓
General disclosures	102-49	Changes in reporting	X	Materiality	✓

GRI STANDARD TITLE	NUMBER	TITLE	CORE	REFERENCE	ASSURANCE
General disclosures	102-50	Reporting period	X	Boundaries of Sustainability Report	✓
General disclosures	102-51	Date of most recent report	X	Boundaries of Sustainability Report	✓
General disclosures	102-52	Reporting cycle	X	Boundaries of Sustainability Report	✓
General disclosures	102-53	Contact point for questions regarding the report	X	Addendum	✓
General disclosures	102-54	Claims of reporting in accordance with the GRI Standards	X	Boundaries of Sustainability Report	✓
General disclosures	102-55	GRI content index	X	GRI Sustainability Reporting	✓
General disclosures	102-56	External assurance	X	External Assurance	✓
MANAGEMENT APPROACH					
Management approach	103-1	Explanation of the material topic and its Boundary	X	Materiality	✓
Management approach	103-2	The management approach and its components	X	Materiality	✓
Management approach	103-3	Evaluation of the management approach	X	Materiality	✓
ECONOMIC					
Economic Performance	201-1	Direct economic value generated and distributed		Business Review, Addendum 1, Addendum 3	✓
Market Presence	202-1	Ratios of standard entry level wage by gender compared to local minimum wage		Staff's satisfaction Addendum 2, Addendum 4	✓
Market Presence	202-2	Proportion of senior management hired from the local community		Staff's satisfaction Addendum 2, Addendum 4	✓
Procurement Practices	204-1	Proportion of spending on local suppliers		Supplies	✓
ENVIRONMENTAL					
Energy	302-1	Energy consumption within the organization		Energy	✓
Energy	302-4	Reduction of energy consumption		Energy	✓
Energy	302-5	Reductions in energy requirements of products and services		Energy	✓
Water	303-3	Water withdrawal		Water	✓
Water	303-4	Water discharge		Water	✓
Water	303-5	Water consumption		Water	✓

GRI STANDARD TITLE	NUMBER	TITLE	CORE REFERENCE	ASSURANCE
Biodiversity	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiverisity	✓
Emissions	305-1	Direct (Scope 1) GHG emissions	CO ₂ Emissions	✓
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	CO ₂ Emissions	✓
Emissions	305-3	Other indirect (Scope 3) GHG emissions	CO ₂ Emissions	✓
Emissions	305-5	Reduction of GHG emissions	CO ₂ Emissions	✓
Effluents and Waste	306-2	Waste by type and disposal methods	Waste	✓
SOCIAL				
Employment	401-1	New employee hires and employee turnover	Staff's satisfaction Addendum 2, Addendum 4	✓
Employment	401-3	Parental leave	Family and work conciliation	✓
Occupational Health and Safety	403-2	Hazard identification, risk assessment and incident investigation	Health and Safety, HACCP, Privacy	✓
Occupational Health and Safety	403-5	Worker training on occupational health and safety	Health and Safety, HACCP, Privacy	✓
Occupational Health and Safety	403-9	Worker related injuries	Addendum 2, Addendum 4	✓
Occupational Health and Safety	403-10	Worker related ill health	Addendum 2, Addendum 4	✓
Training and Education	404-1	Average hours of training per year per employee	Training Addendum 2, Addendum 4	✓
Training and Education	404-3	Percentage of employees receiving regular performance and career development reviews	Training Addendum 2, Addendum 4	✓
Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	Corporate structure, Staff's satisfaction Addendum 2, Addendum 4	✓
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Guests' satisfaction	✓

AUDIT REPORT



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Messrs.:

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Audit Report according to the "Global Reporting Initiative GRI CORE" Guidelines - LEFAY RESORTS Srl and LEFAY RESORT GARDA Srl

This public report is related to the audit performed on the " LEFAY RESORTS Srl and LEFAY RESORT GARDA Srl Sustainability Report" (Lefay Resorts Srl - Lefay resort Garda Srl is hereinafter referred to as "Organization" or “Lefay Resort”) by TÜV Italy Srl (*) for the year 2019.

The perimeter of the LEFAY RESORTS – 2019 Sustainability Report contains information and data related to the administrative offices located in San Felice del Benaco (BS) and the site of Lefay Resort located in Gargnano (BS) – Garda Lake. The document also include some initial information pertaining to the new resort in Pinzolo (TN), operated by LEFAY RESORT DOLOMITI Srl.

LEFAY RESORTS decided to exclude from the scope of this reporting some indicators summarized in the table GRI positioned at the end of the Sustainability Report, as required by the GRI guidelines.

In particular, the environmental data related to the consumption of the administrative headquarter of Lefay Resorts Srl located in San Felice del Benaco (BS) are reported in a specific attachment to the report because they are not relevant compared to those of the hotel sited in Gargnano (BS). In addition, the document does not report energy and environment related indicators pertaining to the new resort owned by LEFAY RESORT DOLOMITI Srl and located in Pinzolo (TN), which is however not part of the scope and perimeter of the verification according to “CORE” option of GRI.

The verification process took place in accordance with the methodology and the phases below described.

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Cod. Identificazione CEE IT 02055510966
Capitale sociale : Euro 500.000 int. Vers.



The scope of the audit

The audit was conducted to assess, with a sufficient degree of confidence, that the techniques related to the collection, control and communication of the data are aligned with the requirements as in the guidelines applied to the reporting process by the Organisation, which is responsible of all the information contained in the Sustainability Report.

Please note that the economic data were only considered to check the compliance with the economic indicators provided by the GRI Guideline.

Audit process

The audit process was divided into several phases conducted remotely in August 2020, by interacting with company referent as well as by reviewing relevant documentation.

The methodology applied made it possible to assess the compliance of the Sustainability Report with all the applicable requirements of the GRI Guideline and selected by the Organization.

Both the management and the operating staff were interviewed, it was performed a sampling of the evidence to support the disclosed indicators, it was decided to carry out a sample check of records and documents, as well as the analysis of the data collection and communication processes adopted by the Organization in the Sustainability Report.

The audit also assessed the reporting principles both those related to the content of the report and those connected to the quality and accuracy of the information. The tests performed by the Organization for the evaluation of the relevant issues (*materiality*) in line with the mapping and analysis of interested parties (*stakeholders*) were analysed very carefully.

The improvement path identified in the previous audit findings was also verified.



Conclusions

On the basis of the adopted verification process, it is possible to confirm that the methodology used by the Organization in writing, checking and processing the texts related to the Sustainability Report 2019 was consistent and reliable in relation to the GRI Guidelines.

The organization demonstrated commitment to making the information contained in the Sustainability Report readable, comparable and presented in an orderly, organic and accurate way. Data source and responsibilities are well identified and clear, besides it is highlighted a high involvement of the staff at any levels in relation to the data collection and monitoring processes.

In consistency with the previous edition of the Sustainability Report, a more in-depth focus on some issues already available in past edition, a clarification in the perimeter of the reporting and an extended approach for stakeholder engagement for the materiality assessment can be confirmed.

On the base of the collected evidence, TÜV Italy Srl could verify that the "LEFAY RESORTS Srl and LEFAY RESORT GARDA Srl Sustainability Report" - 2019 - is compliant with the **"CORE" level** of the Global Reporting Initiative (GRI).

Correctness of the information reported pertaining LEFAY RESORT DOLOMITI Srl, for the period August 1st to December 31st, can also be confirmed despite not being part of the disclosure perimeter verified against the CORE option of GRI.

Opportunity for Improvement

At the end of the activity, the following improvement has been suggested for future disclosures:

- additional degree of details should be provided as what concerns the number and type of injuries eventually occurred, for a better alignment with respective indicator.

During the audit, it was observed a strong commitment by the Organization for the next editions of the Sustainability Report, to complete the full inclusion of LEFAY RESORT DOLOMITI Srl within the disclosure perimeter, by adopting the same data and information quality principles currently in place for the other companies part of the Group.



Methodological note

This final report fulfils the criteria AA1000AS 2008 "Statement of Assurance". The report is public and can be used by LEFAY RESORTS Srl and LEFAY RESORT GARDA Srl only in conjunction with the Sustainability Report, to which it refers.

The Organization cannot omit parts of the report provided by TÜV Italy Srl and it is responsible for all the information presented in its Sustainability Report.

Independence and Information on the Assurance Provider

TÜV Italia Srl, a subsidiary of the international group TÜV SÜD, is an independent inspection and certification body accredited by the major organizations in the social and environmental areas. It has a valuable experience at international level in the certification and verification in the field of social responsibility, environment and carbon management.

During the verification of the LEFAY RESORTS Sustainability Report, TÜV Italia Srl made use of a multidisciplinary team.

TÜV Italy Srl declares to have no conflict of interest towards LEFAY RESORTS Srl, LEFAY RESORT GARDA Srl or LEFAY RESORT DOLOMITI Srl, nor against any other companies included in the scope of the reporting.

(*) This report is formalized on the basis of the information obtained during the Sustainability Report audit written in Italian.

Sesto San Giovanni (Milan), August 28th 2020

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Report and its contents, please send an e-mail to:
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AUGUST 2020



This Report was drawn up using FSC recycled paper as a demonstration
of our commitment towards the environment.

