



# **Sustainability Policy**



**Purpose:**

As one of India's leading hospitality and resort operators, Mahindra Holidays & Resorts India Limited (MHRIL) recognises that sustainability is integral to delivering responsible, high-quality guest experiences and to operating in harmony with the natural and social environments in which its resorts are located.

MHRIL's sustainability approach is aligned with the broader sustainability vision of the Mahindra Group, including the Group's Planet Positive framework, which emphasises greening operations, decarbonising value chains and rejuvenating nature. This alignment reflects the shared belief that long-term business success must be achieved alongside environmental stewardship, social responsibility and positive community impact.

This Policy sets out MHRIL's commitment to integrating sustainability across its resort operations, including the management of energy, water, waste, sourcing and the built environment, while respecting local ecosystems, communities and cultural contexts. It provides a framework to guide decision-making, operational practices and continuous improvement, with the objective of minimising environmental impacts, supporting local livelihoods and enhancing long-term resilience across MHRIL's resort portfolio.

**Scope:**

This Policy applies to Mahindra Holidays & Resorts India Limited (MHRIL) and covers sustainability considerations across its managed resort operations, including day-to-day operations as well as the planning, development, expansion, refurbishment and operation of resort properties and related projects.

The scope of this Policy includes key environmental and social aspects relevant to MHRIL's business, such as energy, water, waste, sourcing, built environment, biodiversity and community engagement, with particular attention to resorts located in ecologically or socially sensitive areas.

This Policy also extends, where relevant, to suppliers, contractors, service providers and business partners engaged in activities at MHRIL resorts or on behalf of MHRIL. In such cases, the Policy sets out expectations and guiding principles, recognising that MHRIL may not have direct operational control over third parties but seeks to influence practices through responsible sourcing, contractual requirements and engagement.

### **Policy Framework and Alignment:**

This Sustainability Policy is supported by a suite of topic-specific policies that provide more detailed guidance on priority sustainability areas relevant to MHRIL's resort operations. These include, among others, the Biodiversity Policy, Food Loss & Waste Policy, and Stakeholder Engagement Policy, which address specific environmental and social aspects in greater depth.

In addition, MHRIL's expectations for ethical conduct, environmental responsibility and responsible sourcing across the value chain are set out in the Supplier Code of Conduct, which applies to suppliers, contractors and service providers engaged with the Company.

Together, these policies form an integrated framework that supports consistent implementation of sustainability principles across MHRIL's operations, projects and business relationships.

## **Greening Ourselves:**

MHRIL is committed to reducing the environmental footprint of its resort operations through responsible resource management, operational efficiency and continuous improvement. The Company seeks to integrate sustainability considerations into day-to-day operations, infrastructure planning and service delivery across its resort portfolio.

- **Energy and Emissions**

MHRIL shall pursue improved energy efficiency across resort operations and progressively increase the adoption of renewable and low-carbon energy solutions. Energy management initiatives focus on reducing consumption, improving system performance and supporting long-term decarbonisation objectives, while ensuring operational reliability and guest comfort.

- **Water Stewardship**

MHRIL recognises water as a critical shared resource, particularly in locations facing water stress. The Company shall implement water stewardship practices aimed at reducing freshwater withdrawal, improving water-use efficiency and promoting reuse and recycling of treated wastewater within resort operations, in

compliance with applicable regulations and local conditions.

- **Waste and Circularity**

MHRIL is committed to responsible waste management across its resorts, with a focus on waste avoidance, segregation, recovery and diversion from landfill. The Company shall continue to strengthen practices aligned with its Net Zero Waste outcomes and promote circular approaches wherever feasible, including reduction of single-use materials, responsible packaging choices and resource recovery.

- **Elimination of Single-Use Plastics and Sustainable Packaging**

MHRIL has eliminated single-use plastics across its managed resort operations, except where plastic packaging is introduced through supplier-provided packaging beyond the Company's direct operational control. In such cases, MHRIL shall seek to minimise environmental impact through responsible alternatives, recovery mechanisms and supplier engagement, in line with the Plastics & Sustainable Packaging Policy.

- **Responsible Sourcing and Consumption**

MHRIL shall encourage responsible sourcing practices that reduce environmental impacts associated with resort operations. The Company shall support local and regional sourcing of food and materials to reduce

transportation-related emissions and support local livelihoods. Preference shall be given to sustainable and low-impact sourcing practices, while ensuring quality, safety and guest experience remain paramount.

- **Operating in Environmentally Sensitive Locations**

MHRIL operates resorts in diverse natural settings, including areas of ecological sensitivity. The Company seeks to minimise environmental disturbance through low-impact operational practices, protection of local biodiversity and wildlife, and prevention of adverse impacts such as habitat degradation or the introduction of invasive species.

Resort operations are guided by a “leave no trace” approach, with the use of environmentally responsible materials, chemicals and practices designed to avoid harmful residues and long-term impacts on surrounding ecosystems. Cleaning agents, pest control measures and other operational inputs are selected and managed to safeguard soil, water, flora and fauna, in line with applicable regulations and site-specific environmental considerations.

- **Towards Triple Net Zero**

MHRIL aspires to progressively advance towards Triple Net Zero outcomes—covering energy, water and waste—across its resort portfolio. This ambition is informed by demonstrated achievements at select resorts,

including Club Mahindra Madikeri, which has achieved Net Zero Energy, Net Zero Water and Zero Waste to Landfill. Learnings from such sites will be used to guide future improvements and replication.

### **Decarbonising Our Industry:**

MHRIL recognises that decarbonisation is a critical component of its sustainability journey and an important enabler of long-term resilience in resort operations. The Company seeks to reduce greenhouse gas emissions associated with its activities by improving operational efficiency, adopting lower-carbon solutions and influencing responsible practices across its value chain.

- **Operational Decarbonisation**

MHRIL shall focus on reducing emissions arising from resort operations through energy efficiency improvements, optimisation of building systems, transition to cleaner energy sources where feasible, and adoption of low-emission technologies. Decarbonisation efforts shall be implemented in a manner that is sensitive to local environmental conditions, regulatory requirements and guest comfort.

- **Low-Carbon Design and Infrastructure**

In the planning, development and upgrade of resort properties, MHRIL shall consider low-carbon design principles and materials that reduce lifecycle emissions. This includes efficient building design, responsible material selection and integration of climate-responsive solutions that support long-term emissions reduction without compromising safety, heritage considerations or guest experience.

- **Responsible Sourcing and Supply Chain Engagement**

MHRIL recognises that a portion of its emissions footprint lies beyond direct operations. The Company shall encourage suppliers, contractors and service providers to adopt energy-efficient and lower-carbon practices relevant to the goods and services they provide. This includes, where appropriate, promoting local sourcing, efficient logistics and responsible material choices that contribute to emissions reduction.

- **Mobility and Logistics**

MHRIL will adopt electric vehicles for internal mobility, operational use and on-site travel at resorts, supported by appropriate infrastructure and operational readiness. These measures aim to reduce emissions while maintaining service efficiency and guest comfort.

In addition, MHRIL shall seek to reduce emissions associated with logistics and transportation through route optimisation, fuel-efficiency improvements and the gradual transition to lower-emission transport options across resort operations and supply chains.

- **Measurement and Continuous Improvement**

MHRIL shall progressively strengthen the measurement and management of emissions across its operations, using available data and tools to inform decision-making, prioritise actions and track progress over time. Insights from monitoring shall support continuous improvement and alignment with the Company's broader sustainability objectives.

### **Rejuvenating Nature:**

MHRIL recognises that its resort operations are closely connected to the natural environments in which they are located. Rejuvenating nature is therefore a core element of the Company's sustainability approach, particularly in locations that are environmentally or socially sensitive.

MHRIL shall seek to minimise adverse impacts on ecosystems and support the conservation, restoration and

responsible management of natural resources in and around its resorts. This includes adopting low-impact operational practices, protecting local biodiversity and wildlife, and avoiding activities that may result in habitat degradation, pollution or long-term ecological harm. As part of this approach, MHRIL shall work towards reducing deforestation-related impacts by avoiding the use of palm oil and palm oil-derived products associated with deforestation or unsustainable sourcing, and by encouraging the use of responsibly sourced alternatives.

Where resorts are located in or near environmentally sensitive areas, MHRIL shall take additional care to operate responsibly. This includes preventing disturbance to wildlife, avoiding the introduction of non-native or invasive species, and respecting local ecological and cultural contexts. Resort operations shall be guided by a “leave no trace” approach, with practices designed to preserve the natural character and integrity of surrounding landscapes.

MHRIL shall also support nature-positive outcomes through responsible landscaping, restoration initiatives and engagement with local communities, conservation organisations and relevant authorities. These efforts aim to strengthen ecosystem resilience while maintaining safe, enriching and authentic experiences for guests.

Detailed commitments, principles and implementation mechanisms related to biodiversity conservation, no-deforestation and ecosystem management are set out in MHRIL’s Biodiversity Policy, which provides the primary framework for managing nature-related risks, impacts and dependencies across resort operations and projects.

## **Sustainability in Built Environment:**

MHRIL recognises that the design, development and operation of the built environment play a significant role in shaping the environmental performance, resilience and guest experience of its resorts. Sustainability considerations are therefore integrated into the planning, construction, refurbishment and operation of resort infrastructure.

- **Responsible Design and Development**

MHRIL shall seek to incorporate sustainable design principles into new developments and major upgrades, with an emphasis on resource efficiency, climate responsiveness and long-term operational performance. Design decisions shall consider local climatic conditions, site sensitivity, natural topography and surrounding ecosystems, while respecting cultural and architectural context.

- **Energy, Water and Resource Efficiency**

The Company shall promote efficient use of energy, water and materials across the built environment through appropriate design choices, technologies and operational practices. This includes integrating solutions that reduce resource consumption over the lifecycle of resort assets, support reuse and recycling, and minimise waste generation, in alignment with MHRIL's broader sustainability objectives.

- **Materials and Construction Practices**

MHRIL shall encourage the use of responsibly sourced, durable and low-impact materials in construction and refurbishment activities, where appropriate. Preference shall be given to materials and practices that reduce environmental impact, support local sourcing where feasible, and contribute to healthier indoor and outdoor environments.

- **Health, Comfort and Guest Well-being**

The built environment shall support guest comfort, safety and well-being through thoughtful design, adequate ventilation, natural lighting and use of materials that do not adversely affect indoor environmental quality. Sustainability measures shall be implemented in a manner that enhances, rather than compromises, the guest experience.

- **Adaptation and Resilience**

MHRIL shall consider climate-related risks and long-term resilience in the design and operation of resort infrastructure. This includes enhancing the ability of buildings and systems to adapt to changing environmental conditions, extreme weather events and resource constraints, particularly in environmentally sensitive or climate-vulnerable locations.

Detailed sustainability requirements, design standards and operational practices are set out in applicable guidelines, standards and procedures adopted by MHRIL for resort development and operations. (See Annexure)

**Governance and Accountability:**

MHRIL has established governance mechanisms to oversee the effective implementation of this Sustainability Policy and to support consistent application across its resort operations and projects.

The Sustainability Council, led by the Managing Director and CEO, shall provide overall direction and oversight for MHRIL's sustainability strategy and performance. The Council shall review progress against key sustainability priorities, guide strategic decisions and ensure alignment with business objectives and regulatory requirements.

At the operational level, responsibilities for implementing sustainability initiatives shall be integrated into relevant functions and roles across resort operations, projects, procurement and corporate teams. Clear accountabilities shall be defined to support execution, monitoring and continuous improvement, in line with this Policy and associated topic-specific policies.

MHRIL shall establish processes to identify, assess and manage sustainability-related risks and opportunities relevant

to its operations, including those associated with climate change, resource use, biodiversity and community impacts. Insights from such assessments shall inform planning, investment decisions and operational practices.

The Company shall support capability building through appropriate training and awareness programmes for employees involved in sustainability-related roles and decision-making. MHRIL's expectations shall also be communicated to suppliers, contractors and service providers to promote alignment with MHRIL's sustainability principles.

Progress under this Policy shall be reviewed periodically, and the Policy shall be updated as necessary to reflect changes in business operations, regulatory requirements and evolving sustainability practices.

**Manoj Bhat**  
**Managing Director & CEO**

**Date: 29<sup>th</sup> December 2025**

## **Annexure**

### **Sustainability Design and Operational Considerations for Resorts:**

This Annexure outlines indicative sustainability design and operational considerations that may be adopted, as appropriate, across Mahindra Holidays & Resorts India Limited (MHRIL) resort developments, expansions, refurbishments and operations.

These considerations support the principles set out in the Sustainability Policy and are intended to be implemented through detailed guidelines, standards and operating procedures, based on site-specific conditions, regulatory requirements and business priorities.

#### **A. Site Planning, Landscape and Green Cover**

- For new resort developments, maintain a minimum of 33% green cover of the total site area.

- For projects located in climate-sensitive or ecologically sensitive zones, maintain a minimum of 15% green cover, subject to regulatory and site constraints.
- Provide adequate tree cover to ensure effective shading within five years of project completion.
- Use open-grid or grass pavers to reduce hard paved areas and mitigate heat island effects.
- Encourage use of native, locally appropriate and drought-tolerant plant species to support biodiversity and minimise landscape water demand.
- Promote water-efficient irrigation systems such as drip irrigation, sprinklers and appropriate planting beds.

## **B. Triple Net Zero Aspirations**

MHRIL aspires to progressively advance Triple Net Zero outcomes, encompassing Net Zero Energy, Net Zero Water and Net Zero Waste, across its resort portfolio. These aspirations are informed by demonstrated performance at select properties and are supported by structured policies, operational practices and continuous improvement initiatives aligned with MHRIL's sustainability framework.

- **Net Zero Energy**

- MHRIL encourages resorts to improve energy efficiency and increase the use of renewable energy sources with the objective of progressing towards Net Zero Energy outcomes over time. This includes optimising energy consumption across interior and exterior areas, deploying on-site renewable energy systems where feasible, and investing in solar hot water systems to meet hot water demand.
- Where on-site renewable energy generation is insufficient to meet total annual energy requirements, projects may demonstrate procurement of Renewable Energy Certificates (RECs) through authorised agencies under valid legal arrangements, in accordance with applicable regulations, to offset remaining energy demand.

- **Net Zero Water**

- MHRIL promotes responsible water stewardship practices aimed at reducing dependence on freshwater sources and enhancing reuse and recycling within resort operations. Resorts are encouraged to adopt water-efficient fixtures and appliances and to implement on-site wastewater treatment systems capable of treating 100% of wastewater generated to reuse standards prescribed by the Central or State Pollution Control Board.

- Treated wastewater and harvested rainwater may be utilised for non-potable applications such as landscaping and flushing, subject to regulatory approvals. Rainwater harvesting systems are encouraged to be designed in line with the National Building Code (NBC) of India, Part 11 – Approach to Sustainability, to capture surface runoff from roof and non-roof areas, as appropriate to site conditions.

- **Net Zero Waste**

- MHRIL seeks to move towards Net Zero Waste outcomes by minimising waste generation at source and ensuring that unavoidable waste is managed through responsible recovery and diversion pathways. Resorts are encouraged to adopt structured waste management practices that prioritise waste avoidance, segregation at source, recycling, composting and authorised recovery, in line with applicable regulations.
- MHRIL shall encourage suppliers providing packaging materials, electrical and electronic equipment, lighting, batteries or plastic-based products to comply with relevant Extended Producer Responsibility (EPR) requirements under applicable regulations. Such expectations are intended to support responsible material recovery, recycling and environmentally sound end-of-life management, and are aligned with MHRIL's broader supplier sustainability and waste reduction objectives.

- Organic waste, including food waste generated from kitchens and dining operations, is managed through prevention, reduction and recovery measures aligned with MHRIL's Food Loss & Waste Policy. This includes improved planning and operational controls, utilisation of food waste for composting or biogas generation, and minimisation of waste sent for final disposal.
- Hazardous waste, e-waste and other regulated waste streams are managed through authorised handlers and disposal mechanisms, ensuring compliance with environmental regulations. Periodic waste reviews, engagement with waste management partners and awareness programmes for employees and guests support continuous improvement towards Net Zero Waste outcomes across resort operations.

### **C. Energy, Roofing and Climate Comfort**

- Provide at least 75% of exposed roof areas with high Solar Reflectance Index (SRI) or high albedo materials and/or roof gardens or vegetation.
- Promote passive design strategies, natural ventilation and adequate natural lighting to enhance comfort while reducing energy demand.

- Encourage energy metering and sub-metering for major energy-consuming systems to support monitoring and optimisation.

#### **D. Materials, Construction and Procurement**

- Encourage use of natural and locally sourced materials for the building envelope to enhance climatic comfort.
- Demonstrate, where feasible, that at least 30% (by cost) of building envelope materials are natural and locally sourced within a 400 km radius of the resort.
- Promote procurement of products and materials with lower environmental impact, including GreenPro or equivalent eco-labelled products for construction and operations.

#### **E. Health, Accessibility and Guest Well-being**

- Ensure adequate fresh air and ventilation in all occupied spaces to support guest comfort and well-being.

- Provide facilities that promote physical fitness and active mobility, such as bicycles, jogging or cycling tracks with appropriate illumination, gyms and indoor games.
- Demonstrate sensitivity to diverse guest needs by providing ramps, accessible pathways and toilets for differently abled guests and senior citizens.
- Promote indoor plants that support indoor environmental quality and guest well-being.

#### **F. Mobility and Guest Experience**

- Encourage internal transportation within resorts through eco-friendly vehicles such as electric, CNG or biogas-powered vehicles for guests and staff.
- Promote walking and cycling by providing well-designed, adequately illuminated pathways and cycling lanes connecting key resort amenities.
- Encourage voluntary guest initiatives to offset travel-related emissions through plantation or conservation programmes, supported by transparent and independently audited utilisation of contributions.

## **G. Operations, Housekeeping and Pest Management**

- Implement housekeeping protocols aligned with the National Building Code (NBC) and promote the use of eco-friendly housekeeping chemicals certified by GreenPro or equivalent standards.
- Adopt Integrated Pest Management practices to minimise chemical use and protect soil, flora and fauna.
- Encourage use of organic fertilisers and pesticides to reduce environmental impact.
- Facilitate segregation of waste at source to support recycling and diversion from landfill.

## **H. Food and Landscape Practices**

- Encourage cultivation of organic fruits and vegetables within resorts, where feasible, to support healthier food options and reduce environmental impacts associated with procurement.

- Promote sustainable landscape management practices that minimise chemical inputs and protect surrounding ecosystems.

The considerations outlined in this Annexure are indicative in nature and are to be implemented in accordance with applicable laws, regulations, site-specific conditions and internal guidelines. Implementation shall be guided by the objective of enhancing guest comfort, safety and experience, while minimising environmental impact across resort operations.



**THANK YOU!**

