



Sustainability Policy

It is recognized that the health and well being of the environment contributes to the health and well being of our employees and the communities and populations we serve. Therefore, we commit to providing leadership in the field of sustainable operations management, either by example or through the sharing of knowledge and expertise.

This policy is aligned with the purpose, values, and governing principles of sustainable development of PGA National Resort & Spa.

In delivering this commitment, our leadership will actively participate and communicate the economic, social and environmental issues and will undertake the following:

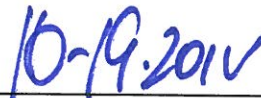
- Incorporate responsible environmental management into everyday business practices, which include minimizing material waste, recycling everything possible, conserving energy, water and zero-pollution of our surrounding natural resources
- Comply with all relevant environmental laws, regulations, and permits
- Communicate policy to all stakeholders using a variety of avenues, both hard copy and electronic, and will make available upon request
- Conserve natural resources by ensuring the responsible use of energy, water, and minimizing waste
- Targets will be set annually for reducing energy, water and waste and using CSRware's ESM monthly tracking system of consumption and GHG emissions through setting targets and monitoring and measuring outcomes
- Create a sustainable purchasing policy to assist us in sourcing services and products with minimal environmental impact, including, where appropriate, the purchase of recyclable products and energy efficient equipment
- Take into consideration the results of stakeholder engagements, the needs of supply chain organizations, and end users
- Appoint a member of staff as the responsible party for the oversight of this policy

- Provide all employees with the necessary training to ensure that personnel are aware of the need to identify risks and to respond properly in the event of an environmental incident
- Conduct regular internal audits and reviews to ensure that all managed operations remain compliant with the sustainability policy
- Work with suppliers and contractors to ensure that they are informed of our policies and expectations for environmental management
- Take into consideration legacy issues and document those positive aspects of our events and activities
- We will participate, as appropriate, in community forums or other activities that promote environmental management

This policy shall be documented and made available to all stakeholders via company website and integrated into the company's internal SOP manual, and shall be updated as needed.



Joel Page
Managing Director



Date