



SUSTAINABILITY

FIVE YEAR PLAN

January 2025 – December 2030



Werribee River, Victoria, Australia



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Cover image: Murray River, South Australia

Belgravia Leisure's five year sustainability and environment objectives



Reduce our waste to landfill and plastic waste through the waste hierarchy methodology.



Reduce our Greenhouse Gas Emissions.



Reduce our energy consumption through efficiencies in operations and infrastructure.



Reduce potable water use.



Improve our sustainability and environmental effectiveness through education, science and data driven case studies, policy and certified systems.

The Three Sisters, Blue Mountains, NSW, Australia

Belgravia Leisure environmental statement

Recognising the importance of the preservation of our natural environment is of fundamental importance to Belgravia Group management and staff.

As we go about operating our business we are conscious of our impact on the environment and our communities. We understand that being environmentally responsible makes good business sense and it's important to our customers, communities, business partners and our staff. We know that Australian business plays a key part in helping manage climate change and reducing greenhouse gas emissions.

Belgravia Group is exploring ways to protect the environment and investing in important environmental projects and partnerships to reduce our environmental impact. The Belgravia Group is focusing on waste minimisation, recycling, reduced corporate travel, and the group is investigating opportunities to become more energy efficient and reduce greenhouse gas emissions and water use across our sites.

We have undertaken a commitment to deal with supplier companies that have a similar ethos on the environment and evaluate quotes and procurement decisions with environmental consideration. This is supported by our procurement policies and guidelines.

The Belgravia Group makes every effort to ensure that our environmental performance is as important as other key performance indicators within our business by ensuring that our systems, policies, processes all support sustainable practices.



Geoff Lord,
Chairman and CEO of Belgravia Leisure
Signed 10 June 2020





Tidal River, Wilsons Promotory National Park Victoria, Australia

Belgravia Leisure history

Belgravia Leisure began in 1974 as Austgolf Management, operating golf courses, function venues and driving ranges across Australia. Belgravia Group acquired Austgolf Management in 1985 to become one of the first Belgravia Group companies.

By 1990, Belgravia Leisure was formed following the acquisition of Leisure Management and Marketing and the partnership with the Genesis Health Club chain. Belgravia Leisure Group was formed in 2006 following the acquisition of Corporate Health Management. At the same time, Belgravia Leisure reached a milestone with 50 centres under its management nationally.

Only two years later, the company was renamed Belgravia Health and Leisure Group to reflect the direction of growth and diversification from previous years.

In 2008, Hepburn Bathhouse and Spa became Belgravia Leisure's first-day spa under its management. In 2013, Belgravia Leisure secured its first alpine contract with Lake Mountain Resort.

New Zealand

In 2015, Belgravia Leisure expanded internationally to New Zealand, managing four aquatic and leisure sites across Auckland, taking the company's total centres under its management to over 100 sites.

Belgravia Foundation

In 2017, the Belgravia Foundation was launched in Australia to help connect people with a disability and of diversity and those who experience disadvantages in sports, aquatic, fitness, recreation and health programs. More recently, in 2022, Belgravia Foundation was proudly launched in New Zealand.

Belgravia Foundation Aotearoa hosted its official launch event on Thursday, 9 June 2022. Belgravia Foundation Aotearoa is now a fully registered charity with Charities Services Ngā Ratonga Kaupapa Atawhai. The mission of the Foundation is to improve access to sports and recreation activities across New Zealand communities so that no one misses out.

BPro

In 2018, Belgravia Leisure acquired BPro, expanding our portfolio of assets under management to include tourism and holiday parks, as well as a Registered Training Organisation (RTO) to provide important certification and qualifications across the holiday parks sector.

After an extensive growth period, by 2022, Belgravia Leisure now partners with more than 70 local and state Government authorities, employs more than 5,500 staff and manages 220+ venues across Australia and New Zealand.



Lake Moogerah, Queensland, Australia

Importance of climate action

The World Health Organisation (WHO) and the United Nations Secretary General Antonio Guterres have stated that climate change is the biggest threat facing humanity in the future. The UN Paris Agreement's aim is to keep global temperatures "well below" 2 degrees Celsius compared to pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. It is imperative that we work to net zero greenhouse gas emissions by 2050 if not earlier. Belgravia Leisure recognise this risk posed to the planet by climate change and have taken action to reduce our contribution to climate change as well as adapt our business operations with climate change recognised as a significant risk to business as usual.

Belgravia Leisure are working to reduce our material greenhouse gas emissions. Belgravia Leisure's material emission sources are electricity, gas, waste, employee commuting, chemicals and water use. The estimated percentage of total emissions from the following GHG emission sources is as follows.

- Electricity is 30 – 35 % of Belgravia Leisure total emissions
- Gas 25 – 35 % of Belgravia Leisure total emissions
- Waste 3 – 12% of Belgravia Leisure total emissions
- Staff commuting 2 – 5% of Belgravia Leisure total emissions
- Chemicals 2 – 3% of Belgravia Leisure total emissions
- Water 2 – 3% of Belgravia Leisure total emissions

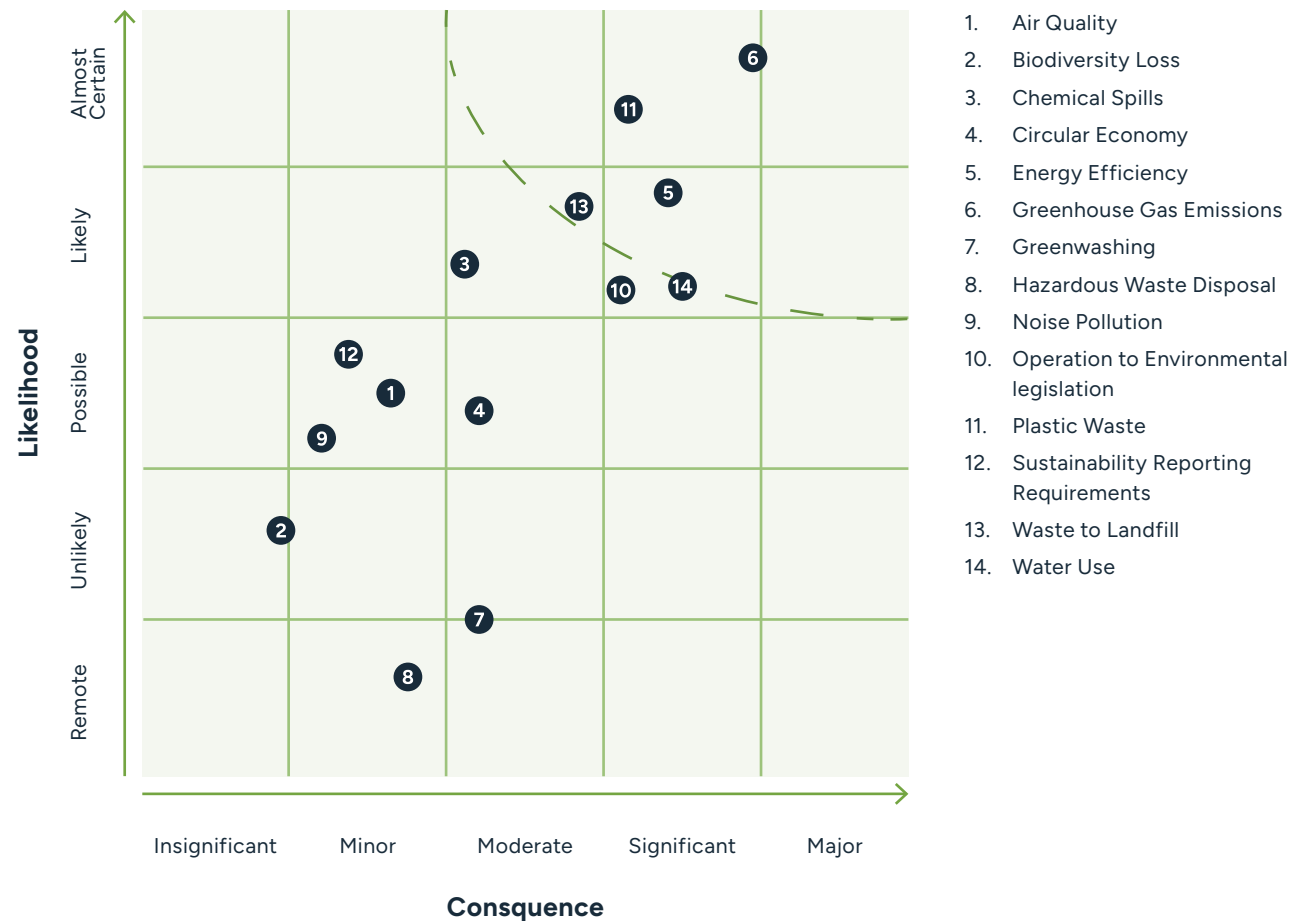
This estimation was determined by doing complete greenhouse gas emissions accounting for 10+ venues and calculating averages.

Our plan and objectives

Belgravia Leisure's safety and risk committee have conducted a risk and opportunity assessment in regard to climate change. During this risk assessment the following sustainability issues were recognised as posing a risk to the business, GHG emissions, water use, plastic waste, greenwashing, hazardous waste disposal, environmental legislation, chemical spills, biodiversity loss, air pollution, noise pollution, circular economy, and sustainability requirements and expectations by our communities and stakeholders.

Belgravia Leisure considered the potential negative and positive impacts of these issues and then ranked them using a risk matrix to determine which issues would be our focus. Belgravia Leisure then conducted a materiality assessment asking our stakeholders what sustainability issues were important to them and this helped provide our priority issues. The environmental issues that were placed above the dotted line represent the issues rated most significant and within Belgravia Leisure's sphere of influence

Environmental Risk Assessment Matrix





Whitsunday Islands, Queensland, Australia

Climate change and GHG emissions

To help develop this five year sustainability plan, a materiality assessment was completed in late 2024. The stakeholders represented were a sample of end user customers, staff, industry bodies, contract partners and suppliers. The purpose of the survey was to determine what environmental aspects and issues were important to our stakeholders. This then influenced the development of the objectives of the next five year sustainability plan to ensure Belgravia Leisure focused on the goals that were important to stakeholders. Over 1100 stakeholders were surveyed.

The response to the materiality assessment showed that the most important environmental issues for our stakeholder were as follows.

The material themes in order of priority.

TOPIC	OVERALL RANKING
Waste, Single use plastic and recycling	1
Climate Change/Greenhouse Gas Emissions	2
Energy use (Gas and electricity consumption)	3
Water use	4
Operating to Environmental Legislation	5



Wild bushfire, Tasmania, Australia

Our commitment to the United Nations Sustainable Development Goals

In November 2024 Belgravia Leisure became a member of the United Nations Global Compact Network Australia. The UN Global Compact is the worlds largest corporate sustainability initiative, with over 20,000 participating businesses. The UN Global Compact supports companies to

- Do business responsibly by aligning business strategies and operations with ten universal principles on human rights, labour, environment and anti-corruption. There are three principles relating to environment.
 - › Principle 7 Environment – Businesses should support a precautionary approach to environmental challenges
 - › Principle 8 Environment – Businesses should undertake initiatives to promote greater environmental responsibility
 - › Principle 9 Environment – Businesses should encourage the development and diffusion of environmentally friendly technologies.
- Take strategic actions to advance societal goals – such as the Sustainable Development Goals (SDG's) with an emphasis on collaboration and innovation.

Belgravia Leisure's five year sustainability plan directly supports the 17 Sustainable Development Goals. The UN 2030 Sustainable Development Goals (SDGs) are 17 global goals set by the United Nations in 2015. The SDGs define global sustainable development priorities and aspirations for the planet. They seek to mobilise global efforts around a common set of goals and targets. We believe that the business community has a role to play in progressing these important issues, and we have aligned our goals with the relevant SDGs.

Below is Belgravia Leisure's signed letter to the Secretary General of the United Nations confirming our support.



12/09/2024

H.E. Antonio Guterres
Secretary-General United Nations
New York, NY 10017
USA

Dear Secretary-General,

I am pleased to confirm that Belgravia Health and Leisure Group supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our commitment to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. Belgravia Health and Leisure Group will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (CoP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress starting the calendar year after joining the UN Global Compact, and annually thereafter according to the UN Global Compact CoP policy. This includes:

- A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.
- The completion of the online questionnaire of the Communication on Progress through which we will disclose our company's continuous efforts to integrate the Ten Principles into our business strategy, culture and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

Nick Cox,
CEO at Belgravia Health and Leisure Group



Beauchamp Falls, Otways National Park, Victoria, Australia



SUSTAINABLE DEVELOPMENT GOALS



The SDG's that our five year sustainability plan directly relate to are;



6. Clean water and sanitation – Ensure availability and sustainable management of water and sanitation for all.

6.3 By 2030, improve water quality by reducing pollution, eliminating dumping and minimising the release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.

6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity.



7. Affordable and Clean Energy – Ensure access to affordable, reliable, sustainable and modern energy for all.

7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.

7.3 By 2030, double the global rate of improvement in energy efficiency.



12. Responsible consumption – Ensure sustainable consumption and production patterns.

12.3 By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses

12.4 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimise their adverse impacts on human health and the environment.

12.5 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimise their adverse impacts on human health and the environment.

12.7 Promote public procurement practices that are sustainable, in accordance with national policies and priorities.



13. Climate Action – Take urgent action to combat climate change and its impacts.

13.1 Strengthen resilience and adaptive capacity to climate - related hazards and natural disasters in all countries.

13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.



14. Life below water – Conserve and sustainable use of the oceans, seas and marine resources for sustainable development.

14.1 By 2025 prevent and significantly reduce marine pollution of all kinds, in particular from land based activities , including marine debris and nutrient pollution.



15. Life on Land – Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification and halt and reverse land degradation and halt biodiversity loss.

15.2 By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.



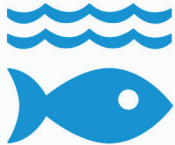
17. Partnerships for the Goals – Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development

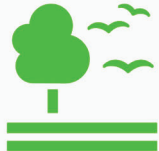
17.6 Enhance North-South , South-South and triangular regional and international cooperation on and access to science, technology and innovation and enhance knowledge sharing on mutually agreed terms, including through improved coordination among existing mechanism, in particular at the United Nations level, and through a global technology facilitation mechanism.

Belgravia Leisure's five year objectives

HIGH LEVEL OBJECTIVES SDG	SUSTAINABILITY GOAL	OBJECTIVE	FOCUS AREAS TO ACHIEVE OBJECTIVE	BASELINE YEAR MEASUREMENT	TARGET	DATE	ACCOUNTABLE PERSON
17 PARTNERSHIPS FOR THE GOALS 	5	Sustainability reporting to ELT quarterly and board monthly	Submit reports to ELT twice per year with progress report on five year sustainability targets	Zero reports submitted currently.	100% compliance	Ongoing	Manager Sustainability and Environment
	5	One Green team representative in each venue managed	Two posts per week on Green Team Channel. Hold 2 x yearly Green Team Meetings	Average one post per month, One meeting held 15 May 2024. Current 71 Members.	70% compliance	Ongoing	Manager Sustainability and Environment
	5	Annual ISO 14001 Environmental Management Systems Certification	Ensure all Environmental Management systems in place to achieve accreditation	Accreditation obtained May 2023. Major non-conformances received for Environment in May 2024.	No Major Non-Conformances.	June 2025 and ongoing annually	Manager Sustainability and Environment
	5	UN Global Compact Annual Report	Submit Annual Report for UN Global Compact	No current report.	Year 1 report submitted on time.	August 2025, then annual submission	Manager Sustainability and Environment, Group Manager People and Culture, Manager of Procurement

HIGH LEVEL OBJECTIVES SDG	SUSTAINABILITY GOAL	OBJECTIVE	FOCUS AREAS TO ACHIEVE OBJECTIVE	BASELINE YEAR MEASUREMENT	TARGET	DATE	ACCOUNTABLE PERSON
13 CLIMATE ACTION 	3	Greenhouse gas emission reduction	Electricity usage	2023 – 2024 FY 19,698,738 kWh per 73 facilities.	Establish energy use per visitation for golf, leisure and Bpro to enable comparison even with growth.	Ongoing	Manager Sustainability and Environment and Manager of Procurement
	1, 2, 3, 4 and 5	Adaptation Strategy	Develop an adaptation strategy for Belgravia Health and Leisure Group	No current strategy.	Adaptation strategy developed .	June 30, 2025	Safety and Risk Committee
7 AFFORDABLE AND CLEAN ENERGY 	2	Greenhouse gas emission reduction	% of sites on Renewable electricity	Number of venues on renewable electricity as at 27 Nov 2024 is 7 from the Optima portal.	No Major Non-Conformances.	June 2025 and ongoing annually	Manager Sustainability and Environment
	2	Greenhouse gas emission reduction	National Suppliers	Review our suppliers Environmental plans and objectives and ensure they align with Belgravia Leisure's. Use the Procurement policy to select suppliers with established environmental credentials and plans.	All national supplier contracts being reviewed have environmental assessment completed by Manager Sustainability and Environment.	As required by contract renewal and EOI's.	Manager of Procurement, Group Hospitality Manager, and Group Merchandise Manager
	2	Greenhouse gas emission reduction	Staff commuting to work	Current events zero.	Run one per annum Sustainable commuting day promotion.	One per year	
	3, 5	Greenhouse gas emission reduction	Gas usage	2023 – 2024 FY 97,625,514 MJ Gas use 21 facilities.	Develop a metric for gas use per visitation, round of golf or nights stay.	Ongoing	Manager of Procurement

HIGH LEVEL OBJECTIVES SDG	SUSTAINABILITY GOAL	OBJECTIVE	FOCUS AREAS TO ACHIEVE OBJECTIVE	BASELINE YEAR MEASUREMENT	TARGET	DATE	ACCOUNTABLE PERSON
12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	1	Reduction in Waste to landfill	Recycling	- Leisure - Holiday park - Golf Course - Head office	Waste to landfill KPI of 55% among Wasteflex clients.	Reported Monthly - Ongoing	
	1	Reduction in Waste to landfill	Waste Management Plan		100% compliance.		
	1	Reduction in Waste to landfill	Waste audits		Complete 3 external waste audits per annum.	June 2025	
	1	Reduction in Waste to landfill	Hazardous waste disposal	Three waste audits completed, hazardous waste found in 100% of venues audited.	All hazardous waste disposed of as per relevant legislation.	June 2025	
	1	Reduction in Waste to landfill	Improved procurement to reduce waste to landfill	Implement sustainable packaging for our café venues. Encourage use of Keep Cups and reusable water bottles.	75% of packaging for inhouse catering at our venues is served in home compostable packaging.	June 2025	Group Hospitality Manager
14 LIFE BELOW WATER 	1, 2	Operation to Environmental legislation	- Environment Essentials. - Environmental incidents reduced - Chemicals used - Cleaning providers		Zero chemical spills where chemical enter the environment. All chemical spills contained. Increase in use of planet friendly cleaning products from 50% to 65%.	Ongoing (monthly COS reports and incident reporting tracking)	Safety team and Manager Sustainability and Environment

HIGH LEVEL OBJECTIVES SDG	SUSTAINABILITY GOAL	OBJECTIVE	FOCUS AREAS TO ACHIEVE OBJECTIVE	BASELINE YEAR MEASUREMENT	TARGET	DATE	ACCOUNTABLE PERSON
15 LIFE ON LAND 	5	Operation to Environmental legislation	- Environment Essentials - Environmental incidents reduced. - Chemicals used - Cleaning providers		Zero chemical spills where chemical enter the environment. All chemical spills contained. Increase in use of planet friendly cleaning products from 50% to 65%.	Ongoing (monthly COS reports and incident reporting tracking)	Safety team and Manager Sustainability and Environment
	4	Water use	Water use	2023 – 2024 FY 213,039 kL water 44 facilities.	Reduce Potable water use.	Ongoing	Manager Sustainability and Environment
	4	Water use	Rain water catchment	Utilise rain water where possible.	Year one, measure number of venues with rain water catchment. Years 2 onwards increase number of venues with rain water catchment.	Ongoing	
6 CLEAN WATER AND SANITATION 	4	Water use	L per visit (Aquatic venues)	- Average litres of water use per annum by Aquatic venues is 65 L. - Average litres of use of water by dry venues is 22. - Average litres of water per night by Holiday parks is measured. - Average litres of water use per round of golf is measured.	Measurements known and comparisons between like venues made.	Ongoing	Manager Sustainability and Environment and operations



Developed December 2024