

STANDARD OPERATING PROCEDURE (SOP)

LOCAL SOP TITLE	Pollution Management Plan		
LOCAL SOP NO.	EO-GEN-009C	NO. OF REVISION	2
DEPARTMENT	Sustainability	EFFECTIVE DATE	1 November, 2025
FOR	CROSSROADS Maldives	APPLICABLE TO	All Business Units
SUPERSEDE SOP #	EO-GEN-009B	RELATED DOCUMENTS	N/A

RECORD OF REVISIONS

REV NO.	REV DATE	BRIEF DETAILS	ENTERED BY
01	16-Nov-2023	Crossroads Branding: - Replaced: Cover page footer as per brand standard - Replaced: Crossroads logo with tagline	Executive Office
02	16-Nov-2023	Replaced: Signatory of the policy	Executive Office
03	01-Nov-2024	Replaced: Signatory of the policy	Executive Office
04	01-Nov-2025	Replaced: Signatory of the policy	Executive Office

Introduction:

Air and water pollution results from chemicals, waste materials, or soils which are discharged or released into the air or water. In order to prevent pollution related to its daily operations and meet regulatory requirements, CROSSROADS Maldives has complied with a Pollution Control Plan for its properties.

Our General Environmental Objectives are:

- To satisfy all necessary guest demands regarding comfort, safety, health and hygiene.
- To comply with all local and national environmental legislation and regulations and continuously improve the environmental management of the hotel, as well as to prevent ecological pollution caused directly or indirectly by the hotel.
- To set objectives and targets according to the identified environmental impacts and to implement and maintain an environmental management system meeting international standards.
- To constantly monitor our environmental impact and advance the efforts and methods for improvements and quality assurance management.
- To save fresh water by efficient management, control of consumption and examination of the wastewater treatment.
- To improve energy efficiency, conservation and management by regular controls, team members training and implementing modern and regenerative or other best available technologies wherever reasonably possible and feasible.
- To reduce and recycle waste and avoid any hazardous substances to minimise harm to the environment.

- To reinforce our team members' ecological and social sensitivity and ensure environmentally sound and safe working conditions with motivation, information and training.
- To take into account ecological and social aspects in our relationship with suppliers and subcontractors and strive for the most environmentally sound solutions.
- To cooperate with organisations of environmental protection, influence authorities and support special projects in the local region to keep the economic, social, environmental and cultural situation intact.
- This Pollution Management Plan will be reviewed on an annual basis and updated as required to reflect changes in legislation, technology, and operational practices. Revisions will also ensure full alignment with the CROSSROADS Maldives Sustainability Management Plan (SMP).

Environmental Sustainability

Our Property operations are focused on energy saving, waste management, and water conservation. Air and water pollution results from chemicals, waste materials, or soils which are discharged or released into the air or water. Our commitment will contribute to a healthier atmosphere for our team members and guests, as well as reduce the negative impacts that our daily operations can have on waterways, air quality and land contamination.

Storage of Chemicals | Preventing Soil Pollution

The property should comply with the following chemical storage and handling guidelines:

- The Head of Department will identify hazardous substances used in their departments and maintain a list of these products.
- The Head of Department will seek to replace products that have been identified as hazardous with less harmful alternatives.
- Storage of substances that may be hazardous will be well-controlled, with access provided only to select colleagues whose jobs require their usage.
- Inventory levels will be reduced to the smallest feasible amount for business operations.
- Access to these containers will be limited only to required team members
- All chemical products intended for cleaning, dishwashing, laundry and pool maintenance will be stored in clearly labelled containers.
- Lids will be frequently checked to ensure they are securely fastened.
- Chemical containers to be placed on the spill trays to collect possible spills/drips/leaks. These containers will be checked regularly for leaks and replaced as needed. Spill trays must be used to avoid mixing of chemicals in soil, which can highly contaminate it.
- Collected chemical spills will be disposed of according to manufacturer guidelines and Maldives law.
- Particular attention needs to be paid to the separation and storage of chemicals that may react with each other. This includes pool chlorine and hydrochloric acid.
- MSDS (Material Safety Data Sheets) for all chemicals used on the property to be displayed or available where the bulk chemicals are stored. This includes central distribution areas, laundry, housekeeping, pantries, kitchens, etc.
- If an MSDS (Material Safety Data Sheet) lists a control or safety measure for a specific chemical, this needs to be employed or available at the point of storage. This includes storage guidelines, material handling equipment, personal protective equipment (PPE) and first-aid treatment measures.

Dishwashing Detergents

Dishwashing detergent used at the resort must meet the following criteria:

- Product is eco-friendly/biodegradable
- Product contains no NTA (nitrilotriacetic acid)
- Product does not contain chlorine bleach

Laundry and Cleaning Chemicals

Laundry and cleaning chemicals used at the property must meet the following criteria:

- Non-phosphate
- Non-toxic
- Eco-friendly/Biodegradable
- Dilutive concentrates (minimum 2X for liquids)

When possible, Green Seal-certified products will be selected. We will select, purchase and use only chemicals that meet the green requirements noted above.

- Maintain a master list of approved chemicals.
- Maintain product documentation from manufacturers in the Housekeeping Department, along with MSDS sheets.

Wherever possible, alternative chemicals will be used to replace chlorine products. When selecting cleaning and pool chemicals, all alternatives will be reviewed and evaluated with the goal of selecting the safest and most environmentally friendly options available.

Paints:

Paints can contain potentially hazardous compounds and solvents that are harmful to human health and contribute to poor indoor air quality (IAQ). Selecting less hazardous paints will reduce health risks, improve IAQ, and reduce disposal costs.

Paints must be considered *environmentally preferable* and meet the following guidelines.

The VOC content of the paints shall not exceed the following limits:

- Interior Flat: 50 g/l
- Interior Non-Flat: 150 g/l
- Exterior Flat: 100 g/l
- Exterior Non-Flat: 200 g/l
- Anti-Corrosive All Finishes: 250 g/l

When selecting and purchasing paint for the facility, products must be closely reviewed to ensure they DO NOT contain the ingredients listed below:

- Antimony
- Cadmium
- Hexavalent Chromium
- Lead
- Mercury
- Acrolein
- Acrylonitrile
- Benzene
- 1,2 dichlorobenzene
- Ethylbenzene
- Formaldehyde
- Isophorone
- Methylene chloride
- Methyl ethyl ketone

- Methyl isobutyl ketone
- Naphthalene
- Phthalate esters
- Toluene (methylbenzene)
- 1,1,1 trichloroethane
- Vinyl chloride

Other VOCs

Volatile Organic Compounds (VOCs) are gases or vapours emitted from products that may have adverse health effects. Commonly used items that may contain VOCs include paint and cleaning products.

Other items that may potentially contain VOCs are outlined below. The VOC content must be evaluated prior to the purchase of the following items, and the lowest VOC content shall be selected.

Building materials such as:

- Rugs and carpets
- Furnishings
- Laminated products
- Adhesives
- Sealants
- Caulking

Waste Segregation | Preventing Soil Pollution

All property will follow established segregation procedures to allow recycling and/or appropriate handling of waste. Waste materials can be segregated into different categories, such as:

- Aluminium, metals and cans
- Plastics
- Glasses and broken chinaware
- Papers and cardboard
- Food, fat/oil and organic wastes

All recyclable and non-recyclable waste is delivered to the Waste Management area to ensure it is recycled and/or handled in a responsible manner that does not contaminate the soil or cause any other harm to the environment.

Energy

- All the technical equipment is maintained regularly & and inspections are documented through our PM System.
- The energy consumption is calculated about turnover, and the number of guests through the online optimiser.
- The energy consumption is recorded and documented every day through the Engineering Department Monitoring system in place.
- An automatic switched-on/off air conditioning system.
- Low-energy lamp bulbs are fitted in all suitable places.
- An induction plate/oven in use.
- Kitchen/Laundry equipment has an energy-efficient setting.

Odour Control

We must monitor and assess odours that may be prevalent in the resort environment, taking into account the following:

- The frequency, intensity, duration and character (offensiveness) of the odour
- Location, e.g. sensitivity of the receiving environment concerning the time of day and the likelihood of people being exposed to odour and/or actual land use
- Background sources of odour
- Perception and cultural issues

The Odour Management Plan must consider critical, actual or potential adverse effects, where they need to be identified, appropriately avoided, remedied or mitigated with conditions before a final decision is made and not left to be addressed in the future.

Cooking smells from kitchens may linger in other parts of the resort. Bacteria may gather in air ducts, air conditioning equipment and other inaccessible places. Over time, untreated odours and airborne bacteria permeate furnishings and even building fabric. To prevent that, the following actions are taken:

1. Annual deep cleaning of the air ducts will be undertaken to eliminate this issue.
2. Ventilation air ducts disperse the waste air into the general atmosphere away from occupied areas.
3. Sewage Treatment plants are located away from occupied areas, hence their storage and treatment will not create and disperse unacceptable odours.

Noise Pollution

Action should be taken where possible to reduce loud noises (>115 dB) at the source. There should be a control on noise levels near the powerhouse, laundry, STP and/or other sensitive areas.

Noise pollution has an enormous environmental impact and does serious damage to wildlife; it can interfere with breeding cycles and rearing and is even hastening the extinction of some species.

The following measures are in place to prevent the negative impact of noise:

- Acoustic soundproof system to cushion the sound of the generators. The sound should not affect the normal work of other colleagues.
- Reduce noise at its source.
- Relocate noisy machines to an isolated area or away from the hotel and its surroundings
- Inform the team members of the long-term health effects linked to noise pollution
- Provide colleagues who are exposed to high noise levels with individual ear protection
- Carry out any noisy activities at times which will cause the least nuisance for the guests, colleagues and wildlife
- Display posters and warning signs in exposed areas to raise awareness
- Due care must be taken by all marine vessels to avoid going less than 25 metres from the house reef (if applicable), as this could potentially cause damage to marine life and corals specifically. Security must inform and educate vessels coming from outside the island if they are to break these norms.
- Jet ski is operated in the lagoon away from the reef or in deep water. A water sports guide will accompany the guests to show them the place where they can use jet skis.
- Jet skis and boats should keep a 20-30 m distance from the crest of the reef edge to ensure the marine life on the house reef is not disturbed by the noise generated.
- Dive instructors to use the emergency bell only in the event of an emergency.
- All music in the dining outlets should be kept to a minimum.
- All noise (music media, gatherings or similar activities) in the Back of the House should cease at 23:30.

SOME OF OUR ACTIONS TO PREVENT POLLUTION

Resort Rooms

- All guest rooms are fitted with heating thermostats & regulators.
- Smoking in all the rooms is not permitted.
- The main switch turns off the lighting in the guestrooms.
- Energy-saving equipment and light bulbs.

At the Resort level:

- Form an "Environmental Committee - Green Team" in the resort to drive the process
- Use only environmentally sound guest supplies and amenities.
- Consider purchasing only from certified suppliers if the process is comparable or acceptable.
- Use wherever possible only organically grown vegetables and fruits in the resort kitchen and support suppliers/farmers who organically grow vegetables and fruit.
- Use recycled papers, tissues, toilet papers and printed materials, wherever available at competitive prices.
- Enlist guest support for environment-sound activities through PR actions.
- Participate in community projects.

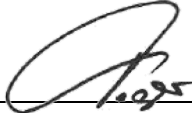
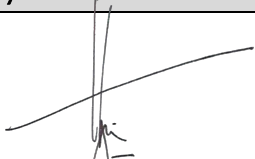
At the Team Member Level

- Establish an "Environmental Champion" for team members.
- Encourage team members to influence the community decisions towards an environmentally sound approach.
- Plant trees.
- Support community programs to raise money for commercial green efforts.
- Spread the information about the necessity for separate garbage collection.
- Support the community in efforts to restore/preserve historical sites.
- Encourage team members to adopt an environmentally friendly approach in their households.

External Communication

- We communicate our Sustainability Management Plan and Environmental Policy openly to the public on our website
- We keep our measures and achievements transparent, traceable and documented
- We inform our guests actively on Sustainability issues via the Green Book in guest rooms
- We encourage Sustainability and invite our guests on various levels to join our efforts (Sustainability Activities folder, Kids Club, etc.)

Approval / Signature:

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