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Travel Chapter Materiality Assessment Methodology

Purpose

Travel Chapter undertakes a materiality assessment to identify, prioritise and regularly review the environmental, social and governance (ESG) issues that are most significant to both the business and its stakeholders.

The assessment informs strategic planning, risk management, sustainability priorities, target setting, reporting and decision-making.

Its purpose is to ensure that Travel Chapter focuses resources on the issues that have the greatest potential to create positive outcomes for stakeholders while managing material risks to the business.

The outputs of the assessment support:

- Corporate Strategy
- Sustainability Strategy
- Science Based Targets initiative (SBTi)
- B Corp certification
- ESG Risk Management
- UK Sustainability Reporting Standards (UK SRS)
- Annual Sustainability Reporting
- Board decision-making

Scope

The assessment covers Travel Chapter's UK operations and considers impacts arising from:

- Corporate operations
- Supply chain
- Homeowner relationships
- Customer interactions
- Communities
- Environmental impacts
- Governance
- Regulatory developments

The assessment considers both current and emerging ESG topics.

Materiality Approach

Travel Chapter applies a double materiality approach.

Material topics are assessed from two complementary perspectives:

Impact Materiality

The actual or potential impacts Travel Chapter has on:

- People
- Communities
- Workers
- Homeowners
- Guests
- Suppliers
- Biodiversity
- Climate
- Natural resources

This includes both positive and negative impacts.

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Financial Materiality

Environmental, social and governance issues that may affect Travel Chapter's:

- Financial performance
- Business resilience
- Strategy
- Operations
- Reputation
- Compliance
- Long-term enterprise value

The Company considers both perspectives when determining material topics.

Stakeholder Engagement

Stakeholder engagement is central to the assessment. Travel Chapter gathers insight from a range of stakeholder groups using existing engagement mechanisms.

Stakeholder	Engagement Method
Employees	Engagement surveys, Green Team, leadership engagement, ESG Committee feedback
Guests	Customer feedback, reviews, complaints, surveys
Homeowners	Relationship Managers, homeowner engagement, sustainability guidance, operational feedback
Suppliers	Procurement engagement, supplier sustainability assessments, Supplier Code of Conduct implementation
Investors	Board reporting, sustainability reporting and governance updates
Local Communities	Charity partnerships, volunteering, community investment programmes
Environmental Partners	RSPB partnership, Marine Conservation Society partnership and collaborative projects
Regulators	Regulatory engagement, consultation responses, compliance monitoring
Industry Bodies	Industry events, sustainability forums and collaborative initiatives

Stakeholder feedback is considered alongside internal data and external developments when reviewing material topics.

Identification of Material Topics

Potential material topics are identified through:

- stakeholder feedback;
- ESG Committee discussions;
- sustainability reporting;
- annual risk reviews;
- climate risk assessments;
- regulatory monitoring;
- industry developments;
- customer insight;
- homeowner engagement;
- supplier engagement;
- community partnerships;
- biodiversity partnerships;
- Board discussions;
- investor expectations;
- sustainability standards and frameworks.

Examples include:

- Climate Change
- Scope 3 Emissions
- Biodiversity
- Nature-related Risks
- Sustainable Tourism
- Responsible Marketing
- Regulatory Compliance
- Supply Chain Sustainability
- Community Impact
- Employee Wellbeing
- Governance
- Data Quality
- Water
- Waste
- Circular Economy

Assessment Methodology

Each topic is assessed using five criteria.

Criterion	Description
Impact Severity	Magnitude of actual or potential environmental or social impact.
Likelihood	Probability of the impact or risk occurring
Stakeholder Concern	Level of importance placed on the topic by stakeholders
Strategic Importance	Relevance to Travel Chapter's long-term strategy and Public Purpose
Regulatory Importance	Existing or emerging legal, regulatory or reporting requirements

Each criterion is assessed using a five-point scale.

Topics receiving consistently high scores are considered material.

Where a topic has a lower likelihood but potentially severe impacts (for example biodiversity loss or human rights), severity takes precedence during prioritisation.

Prioritisation

Material topics are prioritised according to:

- stakeholder importance;
- business significance;
- environmental and social impact;
- regulatory developments;
- long-term strategic importance.

The ESG & Stakeholder Governance Committee reviews prioritised topics to ensure they remain aligned with Travel Chapter's strategy and stakeholder expectations.

Governance

The materiality assessment is overseen by the ESG & Stakeholder Governance Committee.

The Committee:

- reviews material ESG issues;
- monitors emerging risks;
- considers stakeholder feedback;
- reviews sustainability priorities;
- recommends strategic actions;
- monitors implementation of sustainability objectives.

The Committee meets monthly and minutes are recorded for each meeting. The Head of Sustainability prepares a monthly sustainability update for inclusion within the Board pack. This enables the Board to oversee material sustainability issues and consider their implications for corporate strategy.

Material Topics Currently Identified

The Company's current material topics include:

Climate

- Greenhouse gas emissions
- Science Based Targets initiative
- Energy transition
- Climate resilience

Nature

- Biodiversity
- Nature restoration
- Ecosystem resilience
- Water

Communities

- Responsible tourism
- Community investment
- Volunteering
- Local economic contribution

Responsible Business

- Governance
- Responsible marketing
- Green claims
- Regulatory compliance
- Supply chain sustainability
- Data quality

People

- Employee engagement
- Health & wellbeing
- Learning & development
- Fair work

Integration into Business Strategy

The outputs of the materiality assessment directly inform:

- Sustainability Strategy
- ESG Committee priorities
- Science Based Targets initiative implementation
- B Corp recertification
- Community programmes
- Biodiversity initiatives
- Annual sustainability objectives
- ESG KPIs
- Board reporting
- Risk management
- Regulatory compliance

Review Cycle

The ESG & Stakeholder Governance Committee reviews the assessment annually.

A comprehensive reassessment will be undertaken at least every three years, or sooner where there are significant changes to:

- strategy;
- business model;
- regulation;
- stakeholder expectations;
- sustainability risks.

Public Reporting

Travel Chapter publishes a summary of its material sustainability topics through its Sustainability Report and other public ESG disclosures.

The Company remains committed to transparent eporting and continual improvement.

Evidence supporting this methodology

This methodology is supported by existing Travel Chapter governance and documentation, including:

- Monthly ESG & Stakeholder Governance Committee meetings.
- Monthly sustainability reports to the Board.
- Sustainability BORG risk reviews.
- Sustainability Risk Register.
- Sustainability Strategy.
- Science Based Targets initiative programme.
- Annual Sustainability Reports.
- Community Impact reporting.
- Supplier sustainability governance.
- B Corp recertification programme.

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Translation of Material Topics into Objectives and Targets

Material Topic	Strategic Objective	Current Target	Governance
Climate Change	Deliver SBTi	46.2% Scope 1 & 2 reduction by FY2030; 30.0% Scope 3 reduction by FY2031	ESG Committee/Board
Community Impact	Increase positive social impact	+5% weighted community impact score	ESG Committee
Biodiversity	Protect and restore nature	Habitat restoration target +4.57%	ESG Committee
Responsible Marketing	Maintain compliant sustainability claims	Ongoing CMA/ECGT compliance	ESG Committee
Supply Chain	Improve supplier sustainability	Tier 1 supplier ESG assessment programme	Procurement/ESG Committee

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