

URBAN RESORT CONCEPTS ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

Updated: 11 April 2022

The purpose of this Policy is to set out the environmental, social, and governance (ESG) principles that we consider while operating our company, evaluating investments, and managing assets for our Partners.

We believe that good governance practices and responsible corporate behavior contribute to the long-term success of companies and are critical to well-functioning markets. We also believe that strong corporate governance helps reduce investment risk and ensures that investor capital is used effectively.

The following reflects the principles that guide us and the goals that we strive to achieve.

ENVIRONMENTAL

As a core philosophy, Urban Resort Concepts is committed to responsibly investing through environmental sustainability, as well as responsible community development. The commitment to environmentally responsible investments starts with our acquisition team. Urban Resort Concepts conducts rigorous reviews before acquiring properties for management or ownership, to ensure clean environmental backgrounds.

ENVIRONMENTALLY CONSCIOUS IN HOSPITALITY

For newly build projects, we encourage our Partners to achieve standards that base all ourdesign, construction, and operational decisions. From there, we bolster our brand through the application of Evergreen Standards, including:

THE FUNDAMENTAL START

- Sick Building Assessment
- Solar Generation and Water Reclamation Feasibility Study
- Local Community and Ecology Report
- Biophilic Design Assessment

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SITE DESIGN AND BUILDING PLANNING

- Daylighting Design
- Light Pollution Reduction
- Cool Roof
- On-Site Garden or Farm
- Access to Electric Car Charging Stations
- Green-e Certified Fleet

WATER MANAGEMENT

- Efficient Irrigation System and Indigenous Landscaping
- Efficient/Low-Flow Plumbing Fixtures
- Cooling Tower Management
- Building Level Water Metering

ENERGY MANAGEMENT

- Guestroom Energy Management Controls
- Automated Public Area Controls with Building

MANAGEMENT SYSTEMS (BMS) INTEGRATION

- Building a Management System
- Fundamental Systems Commissioning and Verification
- Enhanced Energy Performance modeling
- Building Level Energy Metering
- Maximum Lighting Levels
- Variable Speed Drives on Mechanical Systems

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MATERIAL RE-USE AND WASTE MANAGEMENT

- Locally Sourced Building Materials and Furniture
- Organic Waste Digester
- In-Room and BOH Waste Sorting (Landfill, Recycling, Organic Waste)

CLEAN WATER

- Base-Building Water Filtration System
- On-Floor distribution
- Water Bottle Filling Stations in Public Areas

CLEAN, FRESH AIR

- Minimum Indoor Air Quality Performance
- Construction Air Quality Management Plan
- Low-Emitting Materials
- Indoor Air Quality (IAQ) Monitoring
- Carbon Dioxide Monitoring
- Minimum Efficiency Reporting Value (MERV) Filtration Media
- Operable Guestroom Windows
- Minimum Acoustical Performance

PERFORMANCE IMPROVEMENT

- Environmental Monitoring Platform
- Annual Sustainability Capital Expenditure Plan
- Annual Property Assessment
- Ongoing Commissioning Plan
- Preventative Maintenance Plan

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RESPECT FOR THE LAND

Urban Resort Concepts takes a hands-on approach to preserve irreplaceable habitats and minimize the impact of development on fragile ecosystems. It is our intention to respect the land and work with local leaders in working on new projects while honoring the land and itspeople.

SPEARHEADING THE SHIFT TOWARD CLEAN ENERGY PRODUCTION GOOD FOR THE ENVIRONMENT, AND GOOD FOR OUR INVESTORS!

Urban Resort Concepts is keen to demonstrate environmentally conscious investing can also be profitable investing. Whether employed for hotels, offices, residential, or energy infrastructure, sustainable design and practices often result in more efficient processes that reduce expenses and enhance the value of real estate assets. Such properties also benefit from the growing demand from eco-mindful tenants, buyers, and investors.

We embrace the opportunity to serve as stewards of the environment to encourage sustainability. We are just as serious about serving as stewards of our investors' hard-earnedcapital to maximize returns.

SOCIAL

Urban Resort Concepts is committed to enriching the communities in which we live, work, and serve—and to protecting the interests of all our stakeholders—including investors, partners, vendors, employees, the community, and the environment. We are guided by the following principles:

Create a Positive Workplace Environment

Urban Resort Concepts employees are dynamic, self-motivated, team-oriented individuals who possess the ability to help implement innovative solutions that ultimately benefit our investors. To support all our employees in their efforts, we seek to provide a comfortable and collegial environment in which to work. Urban Resort Concepts adheres to safe workplace guidelines such as OSHA regulations, including monitoring indoor air quality and providing a clean environment for employees.

Urban Resort Concepts also hosts nationally recognized organizations that conduct onsite training sessions for employees. These training sessions provide employees with the skills needed for respiratory and/or cardiac emergencies. Certification classes may include a certificate. Its hotels also maintain first aid kits, medicine cabinets, and AED defibrillators.

In addition, Urban Resort Concepts complies with local authorities to provide a barrier-free workplace. To this end, we operate handicapped-accessible bathrooms and elevators to ensure that our customers and employees can move freely and safely throughout our hotels.

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Maintain a Commitment to Diversity, Equity, and Inclusion

Urban Resort Concepts is deeply committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture but our reputation and company's achievement as well.

Offer a Path to a Rewarding Career

As a luxury and boutique brand, Urban Resort Concepts is the ideal place for employees to build their careers. The Company provides a wide range of work experiences and learning opportunities with our various teams including hotel operations, sales and marketing management, finance accounting, human resources, and information technology. Urban Resort Concepts offers a challenging, fast-paced, collegial environment developed through teamwork and close working relationships. Employees are given extensive responsibilities and are stretched intellectually. We provide employees with a comprehensive training program before they report to their specific teams. We also offer our more experienced employees a catalog of professional classes/training internally and thru other external sources, coveringa range of topics and subject matter that improve both technical and soft skills including leadership and management, operations, Excel, and other applications. Our goal is to empower our professionals to exceed their own expectations. Equally as important as professional development is personal development. We offer personalized learning opportunities on topics such as mindfulness, motivation, and balance.

Foster a Culture of Meritocracy

Urban Resort Concepts creates lucrative incentives for its employees to expand their careers and advance in the organization through promotions and recognition of achievements. The company has a Key Performance Card to monitor and reward employees and teams, all of whom have participated in the Company's performance.

At year-end, employees engage in a performance review process which includes a self-evaluation, manager evaluation, and 360-degree feedback. These reviews are a useful tool for reflecting on one's own performance and providing objective feedback to colleagues andmanagers. Self-evaluation includes the opportunity to outline both short-and long-term career goals, as well as training and development goals.

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Enrich the Lives of Our Employees

We are committed to the health and well-being of our employees. We organize activities to keep fit and engaged as well as build a winning team. We celebrate birthdays and anniversaries as a close family unit.

Uphold High Standards for Our Service Providers

We are committed to hiring contractors and service providers who compensate workers fairly and have a reputation for safety and dependability. It is also important to note that all procurement we do is competitively bid, and all our successful bidders are obligated to comply with local, state, and federal laws pertaining to wages, safety, and building ordinances. For example, depending on the scope of work, most of our construction projects employ at least one full-time OSHA-certified site safety person, and contractors must adhere to rigoroussafety standards.

Urban Resort Concepts seeks to have positive relationships with various unions. However, those relationships do not trump our fiduciary duty to our investors, who expect us to manage costs to increase profitability. Urban Resort Concepts is neither pro-union nor anti-union: we simply try to find the most qualified workers for the best price, and every project is different depending on the size, location, and complexity of the job.

GOVERNANCE

At Urban Resort Concepts, we work hard to meet the gold standard for strong and ethical governance procedures that ensure we never conduct business that could jeopardize our leading role in the community. We are guided by the following principles:

The Company has adopted a comprehensive Code of Ethics. Employees must conduct themselves with honesty and integrity, bearing in mind that their conduct reflects on the Company's and Partner's reputation. Employees must refrain from any activity that places orappears to place their interests ahead of the interests of the Company.

The Company's senior executives work to ensure compliance with all legal and regulatory requirements applicable to the assets managed on behalf of Partners. including, but not limited to, local regulatory laws.

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We perform background checks and diligence to verify the integrity and ascertain or confirmthat Urban Resort Concepts is dealing with responsible corporate clients and companies as well as trade with responsible partners who provide services to its hotels. Urban Resort Concepts follows the country's Anti-Money Laundering Policy which is designed to address the risks related to financing terrorist activities and criminal organizations. We always seek to comply with screening requirements, as required by the relevant governmental organizations.

Urban Resort Concepts has implemented a comprehensive reporting package that follows the Uniform System of Accounting. Reports include Daily Reports, Month End Financial Reports including Balance Sheets.

The Company maintains a comprehensive policy that includes rules related to, among other things, conflicts of interest, gifts and entertainment, and political donations. Urban Resort Concept's longstanding relationships with its investors, business partners, and lenders are a testament to our success in meeting the highest standard of fairness, cooperation, transparency, and commitment.

Sincerely,

Bhupesh Yaday

Chief Executive Officer