

Sustainability report - 2019

Gamewatchers Safaris Travelife Certified



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1. Reporting context

2. Company data

Gamewatchers Safaris

United Nations Crescent n/a
 00621 Nairobi
 www.porini.com
 info@gamewatchers.co.ke

Tourist volume	2001 - 5000
Number of employees	51 - 100
Type of tourism	Active / soft adventure, Sun and Beach tourism, City trips, Culture, history and art, Nature/Wildlife
Special target groups	Young people, Youth and students, Singles, Disabled, Seniors, Families with children
Destinations offered	East Africa, Southern Africa

Sustainability coordinator

Jeremiah Chege
 info@gamewatchers.co.ke

3. Introduction

4. Mission statement & policy

4.1 Mission statement

4.2 Policy

5. Assessment overview

Main theme	Criteria	Completed
0. Company characteristics	26	26
1. Sustainability Management & Legal compliance	33	33
2. Internal management: social policy & human rights	28	28
3. Internal Management: environment and community relations	66	65 1
4. Inbound partner agencies	16	16
5. Transport	9	9
6. Accommodations	16	16
7. Activities	15	13 2
8. Tour leaders, local representatives and guides	10	10
9. Destinations	10	9 1
10. Customer communication and protection	30	30

6. Detailed overview

0. Company characteristics

26

Contact details

2

Action			Details
0.1. Sustainability coordinator			Jeremiah Chege jeremiah@gamewatchers.co.ke +254 774 136523
0.2. General manager/CEO			Mohanjeet Brar mohanjeet@gamewatchers.co.ke +254 722 509 200 +254721856499

Organization structure

6

Action			Details
0.3. Legal body			Gamewatchers Safaris Limited Nairobi Kenya,

		<p>Registrar of companies.</p> <p>25th July 1989</p> <p> Certificate of incorporation Gamewatchers.pdf</p>
<p>0.4. Ownership structure</p>	<p>✓ ✓</p>	<p>Gamewatchers Safaris was established in 1989 by our founder and Chairman, Jake Grieves-Cook, who has been involved in Kenya's tourism industry for over 40 years.</p> <p>Our business credentials are anchored in the local community. Our Managing Director, Dr Mohanjeet Brar, is a 4th generation Kenyan who grew up in the forests of the Kenyan highlands with strong ties to the local community and an interest in forestry and wildlife</p> <p> GWSA Organigram Image.jpg</p>
<p>0.5. Participations</p>	<p>✓ ✓</p>	<p>The directors of Gamewatchers safaris wholly own Porini Limited, which wholly owns the Porini brand of safari camps.</p> <p>These are:</p> <ul style="list-style-type: none"> Porini Amboseli Camp Porini Mara Camp Porini Rhino camp Porini Lion Camp Porini Cheetah Camp Porini Bush Camp (Seasonal) Nairobi Tented Camp Gamewatchers Selenkay Adventure Camp (Seasonal) Gamewatchers Ol Kinyei Adventure Camp (Seasonal)

0.6. Internal structure and branches	✓	✓	<p>Gamewatchers Safaris has a safari side and camps side, both of which report to the company Managing Director.</p> <p>Each department is headed by a manager who reports to the Managing director and the chairman.</p> <p>See attached Organigram for the structure.</p> <p> GWSA Organigram.pdf</p>
0.7. Significant changes	✓	✓	No changes
0.8. Awards	✓	✓	<p>2019 & 2018: World Travel Awards: Africa's Responsible Tourism Award</p> <p>2019 & 2016: TripAdvisor Travellers' Choice Award Winner - Porini Mara Camp</p> <p>2018: TripAdvisor Certificate of Excellence Hall of Fame</p> <p>2018: First runners up Eco warrior award - Best Tour Operator in Engaging People and Culture</p> <p>2018 - Selenkay Conservancy - Best Conservancy in Promoting Culture and Heritage winner</p> <p>2018: - OI Kinyei Conservancy Added to the IUCN Global Green List</p> <p>2017 & 2011 SKÅL International awards - Best Tour Operator</p>

	<p>2016, 2015, 2014 & 2013 World Travel Awards: 1st place Africa's Leading Tented Safari Camps</p> <p>2015 & 2013 World Travel Awards: 1st place Kenya's Leading Safari Camp Brand</p> <p>2013 Eco-warrior first place award for Ecotourism Enterprise of the Year</p> <p>2013: 1st place Best Support and Integration with Local Communities.</p> <p>2011 Kenya Tourism Federation: Best Tour Operator of the year.</p> <p>2010 Ecotourism Kenya: EcoWarrior Award – Best Tour Operator.</p> <p>2009 Ecotourism Kenya: EcoWarrior Award – Best Accommodation.</p> <p>2009 National Geographic Adventure: Top 50 Eco-Lodges in the World.</p> <p>2009 National Geographic Adventure: Best Outfitters On Earth - Top 10 African Safari Company.</p> <p>2008 World Responsible Tourism Awards: Best Conservation of Endangered Species</p> <p>2008 World Responsible Tourism Awards: Best for Conservation of Endangered Species or Protected Area – Winner.</p>
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Scope of certification



Action			Details
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0.9. Scope			<p>The activities of the company include;</p> <ol style="list-style-type: none"> 1. Airport meet & greet and city transfers 2. Book hotels in Nairobi and other major cities in East Africa 3. Tailor and operate safaris with itineraries that include our own Porini Safari Camps as well as the other leading safari camps and lodges in East and Southern Africa. 4. Arrange and book Internal flights within East Africa to all the major parks and reserves. Including cross destination tours within East and Southern Africa. 5. Book beach hotels in Mombasa, Malindi, Lamu, Zanzibar, & Mafia Island, Seychelles & Mauritius. 6. Arrange weddings on safari or on the beach. 7. Plan and arrange Group tours & Incentives Travel 8. Arrange for special interest tours like, Golf safaris, Photographic Safaris, cultural themed safaris amongst others. <p>All of which fall under the scope of certification for Tour operators.</p>
0.10. Scope changes			<p>None</p>
0.11. Measurement changes			<p>No changes</p>

Brands, products and/or services

Action			Details
0.12. Nature of business Please indicate which of the following activities are part of your business.	✓	✓	Inbound tour operator, Land transport, Guiding service, Holiday cottages / houses, Travel agency (leisure), Travel agency (corporate), Online Travel Agents (OTA's)
0.13. Brands (within the scope of the certification)	✓	✓	
0.14. Key business segments / brands	✓	✓	
0.15. Contracted suppliers	✓	✓	
0.16. Sensitive activity types Indicate which of the following sensitive activities are part of your self conducted excursions. Per excursion, a separate checklist will have to be completed. Only indicate those excursion types which are not purchased from third parties.	✓	✓	City tour Hiking, Horse riding, Mountain climbing, Jeep safaris Diving and snorkelling, Boat tours, Motorized activities Visiting traditional communities, Visiting indigenous people Safari tours
0.17. Passenger number	✓	✓	2001 - 5000
0.18. Tourism types	✓	✓	Active / soft adventure, Sun and Beach tourism, City trips, Culture, history and art, Nature/Wildlife

0.19. Target groups	✓	✓	Young people, Youth and students, Singles, Disabled, Seniors, Families with children
0.20. Destinations	✓	✓	East Africa, Southern Africa

Offices, retail outlets and other buildings

3

Action			Details
0.21. Offices Describe the number, locations and ownership of offices used by the company. Indicate approximately how many full-time employees (FTE's) are working per office.	✓	✓	
0.22. Retail outlets Are there any shops/consumer outlets that are part of the certification scope? Describe the number, locations and ownership of the retail outlets used by the company. You can summarize in case of many locations (e.g. divide over region or brand).	✓	✓	
0.23. Other buildings Are there any other buildings that are part of the certification scope? For example, storehouses, car parks, etc. Describe the number, locations and ownership of the other buildings used by the company. You can summarize in case of many locations (e.g. divide over country or brand).	✓	✓	

Personnel

2

Action			Details
0.24. Number of employees			51 - 100
0.25. Categories and gender Describe the amount of formal and direct employed personnel per category (make an estimate):			

Public communication

1

Action			Details
0.26. Brands under Travelife scope			

1. Sustainability Management & Legal compliance

33

Engagement of company

7

Action			Details
<p>1.1. Sustainability coordinator A sustainability/CSR coordinator is appointed and his/her role and activities are defined (corporate level).</p>	✓	✓	<p>Jeremiah Chege- Sustainability Coordinator.</p> <p> job_description_ Sustainability Coordinator.docx</p>
<p>1.2. Management integration Sustainability related tasks and responsibilities are part of the long standing company procedures and processes. Appropriate responsibilities are assigned to the company's staff for actions related to sustainable tourism. An effective internal communication system exists. In larger or more complex organisations a sustainability team is established consisting of managers of branches and/or key departments (e.g. product development; marketing and communication, human resources and internal logistics). The responsibilities of the team are defined.</p>	✓	✓	<p>A Manager in the company, incharge of Product Development, Marketing and ICT has taken up the role of Sustainability Coordinator - Reporting to the top most level of Management - The Managing Director of the company.</p> <p>Further to this Gamewatchers has a voluntary sustainability team whose membership spans across all departments in the company. The team meets fortnightly and discusses around the sustainability policy and as well measurables to the companies sustainability policies, they suggest and assign various roles within the company to meet the sustainability goals of the company.</p> <p>A job description of the sustainability coordinator is attached</p> <p> job_description_ Sustainability Coordinator.docx</p>
<p>1.3. Committed resources The management commits to provide adequate resources (human</p>	✓	✓	<p>The company's Board of Directors is very supportive of sustainable tourism and has empowered the Sustainability team to actively implement the policies throughout the</p>

<p>and/or financial) for the implementation of the sustainability policy.</p>		<p>company. We are in the process of defining specific responsibilities for each job role in line with our sustainability policy to ensure sustainable best practices are followed in all areas of business and knowledge is integrated into company procedure rather than internalised by individual employees (which risks knowledge loss if they leave).</p> <p>We will attach this document once ready.</p>
<p>1.4. Mission statement A sustainability mission statement is defined and published on the company's website(s).</p>	<p>✓ ✓</p>	<p><i>'Gamewatchers is an exclusive tour company that specializes in delivering tailored safaris to small camps and lodges in East Africa. We are committed to helping preserve Africa's unique wildlife, landscapes and local communities. We believe that the best way to do this is through sustainable ecotourism ventures that benefit the local communities and give our guests a rewarding experience. Our Porini group of camps is a sustainable model that practically implements these principles. We are dedicated to providing our clients with exemplary personalized service and strive to have them leave as friends.'</i></p> <p>https://www.porini.com/about-us/sustainability-policy</p>
<p>1.5. Trained sustainability coordinator/team The sustainability coordinator (or team, in case of larger companies) has successfully completed the basic Travelife Sustainability training and exam.</p>	<p>✓ ✓</p>	<p>Jeremiah Chege - Product and Marketing Manager and Sustainability Coordinator</p> <p>Esther Mshote - Corporate Affairs and Human Resources Manager</p> <p> JC Travelife_certificate.pdf</p>
<p>1.6. Trained key staff Key staff members (such as product managers, communication</p>	<p>✓ —</p>	<p>The Sustainability co-ordinator has completed the basic travelife training and trained on other courses via the travelife portal.</p>

managers and sales managers) have completed the Travelife training.			The HR
1.7. Additional training management The sustainability coordinator, key staff members and/or management have received additional training/education related to sustainable tourism management and health & safety issues (e.g. ISO 14001, university courses, specific courses).	✓	—	Yes, the Sustainability Coordinator and our Corporate affairs Manager - both members of the sustainability committee recently trained with travelife and Green tour movement at the Utalii hotel and got a certificate for their attendance. 2

Social cooperation

3

Action			Details
1.8. Collaboration The company is actively involved in external forums and working groups which are supportive to sustainability in tourism.	✓	✓	Can be a member of Kenya Association of Tour Operators (KATO), Ecotourism Kenya, Travelife Eco- Tourism Kenya - Member Kenya Association of Tour Operators Member East Africa Wildlife Society Member. Maasai Mara Conservancies association Kijabe Forest Trust Kenya Tourism Board
1.9. Exchange of experiences Experiences and best practices concerning sustainability are shared with other companies and stakeholders (e.g. via the Travelife website)	✓	—	Yes, we are active online via our blog and social media, Our Directors have also given interviews that are shared by national and international press in regards to sustainable tourism and the impact of conservancies in Kenya. Our responsible tourism projects

		<p>have also featured on CNN INSIDE AFRICA and BBC TV channels. Further to this our directors are often called to present/talk at national forums. e.g at Magical Kenya Expo. Our conservancy model has been researched for doctorates by two pHD candidates from Oxford Brookes, UK and PHD from Canadian University and a Masters student from Cambridge. We are also currently engaged with IUCN on having one of our areas listed as a global green destination.</p> <p>We create donation cards and booklets that advice our clients on how they can help. And also share our experiences with the conservancies with like minded people, this has seen increase in areas under conservancies in the Porini sustainable model, where we control the density and ensure the local communities benefit.</p> <p>We have Social media presence with a facebook following of over 20000 fans and regularaly share and engage with our followers on best practises and csr projects. facebook.com/gamewatchers. Similarly we are also active on twitter.</p>
<p>1.10. Donations The company provides support to nature protection organisations and/or community development (e.g. infrastructure, education, health, sanitation) or other local/national sustainability initiatives. Can also be done by stimulating staff and/or client donations including in-kind contributions (e.g. volunteering).</p>	<p>✓ ✓</p>	<p>We have attache here a comprehensive document with our donations and where they have gone. Here below are the various projects that we are involved in. Ilmonchin School Sanitation Project</p> <p>Water, Sanitation and Hygiene (WASH) conditions in rural Kenya are a big problem. Our latest project addresses a much-neglected but vital issue for school children in rural Kenya and that is the subject of provision of adequate toilet facilities in the schools. For this project we are partnering with Dig Deep, a UK charity working to transform the lives of children and communities in rural Kenya, to improve facilities for Ilmonchin Primary School in OI Kinyei Community.</p> <p>OI Kinyei Bursary Fund</p> 

We are supporting the families of OI Kinyei with our Bursary Fund, alleviating some of the financial burden of the childrens' education.

[Koiyaki Guiding School Scholarship Fund](#)



The Koiyaki Guiding School provides tourism training for the Maasai. The Scholarship Fund creates opportunities for promising youth who show a passion for wildlife and conservation, but who may not be able to afford the school fees.

[Porini Boma Strengthening Programme](#)



We aid the local Maasai in reinforcing their traditionally constructed bomas to help prevent predators from entering the Maasai village and livestock enclosures. The reinforced bomas ensure that predators that target their natural prey are no longer threats to the community.

[Porini Conservancies Rangers Programme](#)



Rangers are the backbone in ensuring wildlife and habitat security in Kenya's Parks, Reserves and Conservancies. As our conservancies have grown, so has the need for more rangers. We ensure that our partner communities see a direct benefit from this

		<p>initiative as we employ 100% of our rangers from within the local villages.</p> <p>Provision of Water to Selenkay Villages</p>  <p>As part of our pledge to support the communities from which we lease conservancy land, we have improved access to safe water with the provision of water tanks. The project now raises funds towards the cost of the ongoing water deliveries.</p> <p> Porini Trust Donations.xls</p>
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Baseline assessment

2

Action		 Details
<p>1.11. Overview partners/suppliers The company has a system in place to identify the sustainability performance of the key supply chain businesses it works with, whether directly or indirectly.</p>		<p>We have borrowed a template from our peers and will use the attached to identify suppliers that have sustainability certification and also those that are operating sustainably. We will use favorable responses as a priority list for suppliers that we should promote. We will also use the same to advise our clients on the accommodation recommendations we offer and why.</p> <p> Gamewatchers Safaris checklist for sustainable accommodation.docx</p>
<p>1.12. Baseline assessment</p>		<p>Yes, By answering all the criteria in this checklist for a start.</p>

The company has conducted a baseline assessment regarding its compliance with the Travelife sustainability best practice standard (e.g. by completing this report).

Policy

2

Action			Details
1.13. Sustainability policy The company has a written sustainability policy which reflects the company structure and activities, and is supported by top-management. The policy aims for a reduction of the negative social, cultural, economic and environmental impacts of the company's activities, and includes employee related health & safety aspects.			Uploaded here, A shortned version of the same is available on our website https://www.porini.com/about-us/sustainability-policy/  Gamewatchers Sustainability Policy.docx
1.14. Communication The sustainability policy is accessible to all employees, suppliers and the general public via the corporate website(s) (where no website exists, via other means).			https://www.porini.com/about-us/sustainability-policy/

Action plan

3

Action			Details
1.15. Action plan The company has a sustainability action plan (with targets, actions, measures, responsibilities and time planning).			We are currently developing our action plan and have indeed achieved some of our objectives. The tasks are ongoing. I have uploaded this here, though still being improved.

			 sustainability action plan book1.xlsx
1.16. Staff involvement The management involves employees in the development and implementation of the action plan and acknowledges them as a driving force for successful and continuous sustainability improvements.	✓	✓	The company through the sustainability committee engages all staff members, including the a supportive management on the implementation of the action plan. The Plan is developed with input from the committee members who are pulled from every department.
1.17. Product developers and contract managers Product developers and contract managers are informed, trained and provided with resources to implement the supplier related policies.	✓	✓	Our Sustainability coordinator heads the contracting team and is heavily involved in the day to day running of the department. He has been trained on the travelife criteria and is committed at a personal level to sustainability. He has developed questionnaires to engage our suppliers and circulated this to the contracting and database supervisor. Both are members of the sustainability committee which is involved in enlightening the rest of the team on sustainability.

Monitoring and evaluation

5

Action			Details
1.18. Monitoring and evaluation The company has documented procedures in place to monitor and evaluate the implementation of the sustainability policy, objectives and targets.	✓	✓	To ensure effective implementation of the policy, we are have added departmental Standard operating procedures Linked to our policy and thus help us in achieving our sustainability objectives. Our corporate affairs team is also developing an appraisal system for all staff where

			<p>adherence to the Standard operating procedures will be evaluated.</p> <p>At the camps that we own, energy use, Water and waste is measured and recorded and is part of standard procedure to evaluate our policies.</p> <p>In the office the sustainability committee meets every two weeks and discusses objectives and targets and develops tasks to ensure we meet our goals. Resolutions from these meetings are reported to the company Managing Director after every meeting.</p>
<p>1.19. Corrective measures The company has procedures in place which are designed to identify discrepancies between planned objectives and actions. These procedures should be designed to identify the cause and prove that corrective measures have been taken and are efficient.</p>	✓	✓	The company is setting SMART targets.
<p>1.20. Staff Communication Staff members are regularly updated on the company's sustainability policy, activities, results and related developments via newsletters, intranet or other internal communication channels used by the company.</p>	✓	✓	
<p>1.21. Records The organisation keeps records of conformity to the requirements of its sustainability management system.</p>	✓	✓	We keep Our records with the HR office and document then internally, however we meet this criterion automatically by uploading all requested and other relevant documents in the Travelife reporting system.
<p>1.22. Performance branches A system is in place to monitor the performance of main branches or main sub-brands regarding sustainability (if relevant for the size and structure of the company).</p>	✓	✓	We only have our head office in Nairobi - No Branches.

External reporting and communication

4

Action			Details
<p>1.23. Management reporting At least once a year, the sustainability coordinator reports to top management on the effect of the implemented policies and actions, the status of the objectives and formulates recommendations for the next steps.</p>	✓	✓	Our sustainability co-ordinator is also our Product and Marketing Manager ,he is part of our green team and is in charge of internal reporting including Travelife.
<p>1.24. Travelife reporting The company reports its progress via Travelife at least every two years.</p>	✓	✓	For travel life to audit our practice and standards we have to submit the travelife report thus we are complying.
<p>1.25. Public reporting The key sustainability results are reported to the public at least every two years and are available on the company website.</p>	✓	✓	
<p>1.26. Sustainability and public relations The company enables and facilitates sustainability related questions and feedback from customers and other stakeholders. There is a clear indication on the companies web site on how to address such questions and feedback.</p>	✓	✓	<p>Our Director sends personal email to all our direct clients after their stay to hear their feedback and help answer any questions that they may have about our sustainable model.</p> <p>We also have open contact lines posted on our website and social media pages, our offices are easily accessible and open to customers and stakeholders. we allow our suppliers too, time to meet with our staff so that information is exchanged.</p>

		we are looking for better customer feedback model on sustainability engagement with or customers.
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Legal compliance and fair business practices

7

Action			Details
1.27. Legal requirements overview The company maintains an up-to-date list of international, national and local legal requirements (applicable for its direct operations).			Gamewatchers is aware of relevant legal requirement(as far as possible)
1.28. Legal compliance The company is in compliance with all applicable local, national and international legislations and regulations, including health & safety, labour, environment and ethical standards.			We hereby declare that our company is in compliance with all legal requirements as far as we are aware of.
1.29. Ethical code The company has an ethical code for all management levels and for other employees.			The company should comply to the KATO code of conduct or the internal Company's code of conduct. Declare that you are in compliance with the KATO code of conduct and / or upload your own code of conduct.  Employee Manual GWS- Revised 2015.doc
1.30. Corruption A guideline against corruption and bribery exists and is complied to. Non-compliance by the company or employees is contested.			We have uploaded a document below on the anti-corruption and bribery policy, further to this we are also engaging with the blue company http://the-bluecompany.org/

			 Anti_bribery policy.docx
1.31. Political involvement The company ensures that, when deciding to contribute to political lobby groups and/or political parties, the contribution is ethically permissible.	✓	✓	
1.32. Fair competition The company is not involved in activities which are considered unfair competition or in violation with an anti-trust legislation.	✓	✓	The company is not involved in any unfair competition. This criterion is also now monitored by the government through the competition authority, responsible for investigating restrictive trade practices specifically on horizontal, vertical and abuse of dominance cases, evaluation of exemption applications and ensuring compliance with the Orders issued under the Act. The Department also gives advisory opinions in regard to the a forementioned practices.
1.33. Non-compliance If sanctions are imposed for non-compliance with legal requirements and ethical principles, the company explains the cause and the corrective measures that have been taken.	✓	✓	<p>As we have our standard operating procedures intertwined with our Sustainability policy, we apply our disciplinary mechanism when handling non compliance issues, for instance - the No littering policy or the bulk and local purchase policy for our procurement team. Where we experience non compliance the steps we undertake are as below</p> <p>Verbal Warning: A verbal warning will be considered when the unacceptable behaviour is symptomatic of correctable behaviour. It will be recorded and retained on file for a period of 6 months. The issuing authority is the human resource department.</p> <p>Written Warnings: Written warnings may be used when the verbal warning(s) fail to produce the required results or where stronger action than a verbal warning is required. Written warnings shall be issued by the human resource department and remain valid for a period of two hundred and ninety two working (292) days.</p> <p>Dismissal: This may be considered where there is gross misconduct so as to justify the</p>

		summary dismissal of an employee with lawful cause. Dismissals shall be done by the human resource department.
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2. Internal management: social policy & human rights

28

Social policy and human rights

25

Action			Details
<p>2.1. Freedom of association Trade union membership, collective labour negotiations and representation of members by trade unions is not hindered.</p>	✓	✓	<p>Freedom of association is covered in the Bill of Rights in the Kenyan constitution. We as company declare that we comply to this law.</p> <p>"All our employees are granted the right to associate freely and to bargain collectively, by forming and joining workers' organizations or through alternative means."</p> <p>Thus states our policy that is found here https://www.porini.com/about-us/sustainability-policy/</p>
<p>2.2. Collective labour agreement The company participates and is in compliance with a (sector wide) collective labour condition negotiation structure (in case locally existing).</p>	✓	✓	<p>There is no collective labour agreement in Kenya. In Kenya collective labor agreements are only applicable to unionized companies.</p> <p>We pay above the average minimum wage, offer contracts to all staff working for us so they are clearly aware of the terms. we also have complied with all the labor laws in Kenya.</p>

<p>2.3. No forced labour Employees are free to enter or leave their employment through their own choice without penalty (in accordance with their contract).</p>	✓	✓	<p>Forced labour is prohibited in the labour laws of Kenya (Employment Act, 2007).</p> <p>We declare that our company is not involved in forced labor practices. All our employees are free to leave the company at any time in compliance with their contracts and national regulations.</p>
<p>2.4. HR Policy The company has a written Human Resource policy.</p>	✓	—	<p>Gamewatchers safaris has a HR Policy that includes;</p> <p>Employment status Recruitment and probationary process. Office work and schedule Disciplinary action and others</p> <p> Employee Manual GWS- Revised 2015.doc</p>
<p>2.5. Formal contracts All employees of the company have an employment contract, including labour conditions and a job description.</p>	✓	✓	<p>Every staff member has contract that is issued to them prior to joining the company, this contract has the stipulated job description, if in agreement, the contract is signed and a copy filed - the employee retains their own copy for future reference. Attached is a sample contract</p> <p> Employment Contract.pdf</p>
<p>2.6. Living wage The company pays employees at least a living wage which is equal to or above the legal minimum.</p>	✓	✓	<p>Minimum wage is set by Kenyan government to be KSh. 13,475 per month (2017).</p>

			<p>The company pays employees at above the legal minimum. this is beacuse we recognise the team that we form to be our most important asset in achieving our goals.</p>
<p>2.7. Overtime Overtime is paid (or time is given back as lieu), unless specific conditions relating to overtime have been agreed by the employee and written into their signed contract of employment.</p>	✓	✓	<p>Employees working extra hours and off days are compensated by being allowed to take similar time off. Depending on the department, the company pays overtime in the same month earned.</p>
<p>2.8. Medical insurance The company contributes to a (basic) medical insurance for all employees on the basis of legal requirements or industry best practices.</p>	✓	✓	<p>We are in compliance with the basic insurance medical scheme which is provided by government, deducted from payroll (National Hospital Insurance Fund).</p> <p>We are in compliance with the basic insurance medical scheme which is provided by government, deducted from payroll (National Hospital Insurance Fund). Over and above that we have a private in and out medical scheme that covers our employees, spouse and two children.</p>
<p>2.9. Maternity The company offers schemes for pregnancy and maternity leave for all employees.</p>	✓	✓	<p>This is provided for by law</p> <p>Employment Act Cap 226 sub 7 (2): (www.kenyalaw.org)</p> <p>(2) A woman employee shall be entitled to three months maternity leave with full pay:</p> <p>We declare as a company compliance with the Employment Act.</p> <p>This is protected by law in Kenya. We allow our female employees paid maternity leave of 03 months. The men too enjoy 2 weeks of paternity leave.</p>

<p>2.10. Disability risks The company contributes to a (work related) disability-risk insurance for all employees.</p>	✓	—	<p>Our Insurance covers personal accident / disability-risk insurance of all employees. it is a requirement under the Kenya law.</p> <p> GameWatchers Safaris Ltd Tour Operators Liability _ Cover Note _ 2018_2019.pdf</p>
<p>2.11. Liability Insurance The company has a liability insurance for all its employees (e.g. in case of work related accidents).</p>	✓	✓	<p>General Public Liability Insurance as attached below.</p> <p> GameWatchers Safaris Ltd Tour Operators Liability _ Cover Note _ 2018_2019.pdf</p>
<p>2.12. Pension The company contributes to a pension scheme for all staff members.</p>	✓	—	<p>All Employees are pensionable with the government scheme, we have also a private pension fund for staff where the company contributes 5%.</p>
<p>2.13. Holiday / Annual leave The employees have the right to a fixed yearly paid holiday (at least in compliance with the legal requirements).</p>	✓	✓	<p>Provided By law</p> <p>Employment Act Cap 226 sub 7 (1): (www.kenyalaw.org)</p> <p>(1) Every employee shall be entitled -</p> <p>(a) after every twelve consecutive months of service with his employer to not less than twenty-one working days of leave with full pay;</p> <p>8. Every employee shall be entitled to at least one rest day in every period of seven days.</p>

			<p>We comply with the Law, every member of staff is entitled to 22 days annual leave in a calendar year .</p>
<p>2.14. Sick Leave Employees are entitled to paid sick leave in line with national legal requirements.</p>	<p>✓</p>	<p>—</p>	<p>The employee will be entitled to a maximum of one calendar month (30 days) sick leave on full pay and thereafter, and if necessary, a further one calendar month (30 days) sick leave on half pay in each period of twelve consecutive months of service, subject to production by the employee of a certificate of incapacity to work signed by a duly qualified medical practitioner or a person acting on the practitioner's behalf in charge of a dispensary or medical aid centre. In the event of protracted illness lasting longer than three calendar months (90 days) which prevents the employee from working then it is agreed that the contract may be terminated. For an employee to be entitled to sick leave with full pay, the employee shall notify or cause to be notified as soon as is reasonably practicable his employer of his absence and the reasons for it. Allowable notification period is within twenty four (24) hours.</p> <p>We include the above n the contracts we issue, so all employees are aware.</p>
<p>2.15. Additional benefits Employees are awarded additional benefits beyond their legal entitlement (e.g. profit-sharing schemes and saving funds).</p>	<p>✓</p>	<p>—</p>	<p>Sales Staff have a commision upon reaching certain sales targets. this is over their monthly salaries.</p> <p>From time to time there are other benefits, like bonus based on the performance of the company.</p>
<p>2.16. Health and safety The company has a health, safety and crisis management policy for employees, which complies to legal standards/best practices. Accidents and incidents are investigated and corrective measures are</p>	<p>✓</p>	<p>✓</p>	<p>We comply with all requirements of Government, Tourism and Conservancy laws and regulations that help protect visitors and employees. We train our staff yearly n health, safety and emergency response e.g. first aid skills, fire-fighting skills We have in place an an adequate and effective emergency procedure/plan</p>

<p>taken. First aid kits and trained staff is available at all relevant locations.</p>			<p>for any dangerous situation in the office and as well for our drivers when on the road. we are in compliance with relevant legislation on health and safety. e.g. OSHA We have in place extra health and safety measures for both staff and clients, for intance we have a health cover for all employees and put our cleints under eemergency evacuation cover.</p>
<p>2.17. Equal opportunities The company ensures that people are not discriminated in regards to recruitment, conditions of employment, access to training and senior positions, advancement in terms of residentship, gender, race, age, disability, ethnicity, religion/beliefs, sexual orientation or in any other way.</p>	✓	✓	<p>This is stipulated in the contract and the employee handbook.</p> <p> Employee Manual GWS- Revised 2015.doc</p>
<p>2.18. Child labour The company does not employ children (14 year or younger) to complete work which is normally undertaken by adults. And, there are special working times and conditions for children working within the business in accordance with national regulations and the UN Convention on the Rights of the Child, whichever provides most protection incorporating the exceptions under the ILO convention 138.</p>	✓	✓	<p>We declare that our company is not involved in child labor practices in accordance with the Employment Act.</p> <p>Child labour is Illegal in Kenya.</p>
<p>2.19. Complaints procedure The company can demonstrate that there is a documented effective procedure through which employees may raise grievances. Appropriate and timely follow up procedures are also in place.</p>	✓	✓	<p>The objective of the grievance procedure is to resolve disputes as quickly and fairly as possible. If an employee feels at any time that disciplinary action taken against him/her is unfair, or he/she has any grievance, he/she may invoke the grievance procedure as follows:</p> <p>Any grievance must first be raised with the employee's supervisor. Every effort must be made by both parties to resolve the grievance. If no satisfactory settlement can be reached, the grievance will be referred to the human resource office for resolution.</p> <p>The decision of the human resource office in the issue is considered final, unless the grievance is against the human resource office in which case the issue will be decided</p>

			<p>by the Commercial Director.</p> <p>All grievances reaching the human resource office will be documented in writing.</p> <p>Page 18 of the Gamewatchers Safaris Employee Handbook</p> <p> Employee Manual GWS- Revised 2015.doc</p>
<p>2.20. Representation The company has a means through which all staff may make representation to senior management about key employment issues and there is a clear process which demonstrates how such representations are followed up.</p>	✓	✓	<p>This is outlined in the employee handbook attached.</p> <p> Employee Manual GWS- Revised 2015.doc</p>
<p>2.21. Disciplinary procedures There are documented disciplinary procedures in place and staff are aware of them.</p>	✓	✓	<p>This is stipulated in the contract and the employee handbook.</p> <p> Employee Manual GWS- Revised 2015.doc</p>
<p>2.22. Flexible working times The company supports flexible working times or part time employment (e.g. to support family obligations)</p>	✓	—	<p>The company allows Flexitime.</p> <p>We have staff that come early to leave early so as to either attend school or attend to family obligations. The extra hours worked in the course of the day are taken later in the day, for instance if you come in at 0700 hours you could leave at 1530hours as you will have worked the recommended hours for the day,</p>

<p>2.23. Access for persons with special needs The office building and other premises of the company provide, where technically and financially viable, access and related information for people with special needs.</p>	✓	✓	<p>Though a rented premise, we have parking available close to the office and a minimum 1 step into or out of the building.</p>
<p>2.24. Persons with special needs The company employs persons with special needs</p>	✓	—	<p>We ensure that all employees have an equal chance and access to resources and opportunities. We prohibiting discriminations against person with special needs.</p>
<p>2.25. Measuring employee satisfaction Employee satisfaction is regularly measured and suggestions are taken into account.</p>	✓	✓	<p>Every manager is tasked with having scheduled one on one meetings with their teams and to provide feedback on the below questions: What aren't we doing well? If you could change one aspect of your job, what would it be? What do you wish you were doing more of? Do you think the team is successful at working together? Why or why not? Do you see yourself leaving five years? Why or why not?</p> <p>Our Managerial floor policy and is accessible to all staff to raise any issues or complaints directly with him. We have implemented an employee suggestion box whose postings will be read every week by the corporate affairs manager and a summary of the report send to the managing director. We also are implementing a staff appraisal process that will as well be used to gauge employee satisfaction in the one-on-one scenario mentioned above. This will be done annually.</p>

Training and education



Action			Details

<p>2.26. Health and safety All personnel receive periodic training regarding their roles, rights and responsibilities with respect to social & cultural practices, economic & quality issues, human rights issues, and health & safety practices (including risk and crisis management).</p>	✓	✓	<p>All employees are taken through an induction process and annual fire and safety trainings conducted but we have added on our action plan more training on the same and on sustainability best practices.</p>
<p>2.27. Personal development The company ensures its staff competencies, personal development and advancement (at all levels of responsibility), by equally offering resources and opportunities, such as regular trainings, access to education or gaining experience on the nature/organisation of their work.</p>	✓	✓	<p>All new employees have a buddy who acts as a partner to train them and ensure they are able to perform their duties along with the line manager. The company provides training where appropriate. For example, marketing to attend the etourism conference, HR to attend training on Human Resource, Accounts for training on new tax requirements etc.</p>
<p>2.28. Trainee positions Traineeships/Internships are offered to students.</p>	✓	✓	<p>Yes. We work with the Utalii college, Strathmore, Egerton University and other local institutions in offering internees placement in our company. Trainees have an opportunity to train with every department to for a holistic experience. Should vacancies arise, we do take onboard former trainees for those positions. Attached is a sample trainee schedule.</p> <p>3</p>

3. Internal Management: environment and community relations

65

1

Procurement

12

Action			Details
<p>3.1. Reduction of disposable and consumable goods The company has a policy to measure and actively reduce the use of disposable and consumer goods (especially paper for internal office use).</p>	✓	✓	<p>Yes.</p> <p>We have invested in a server where we store all our contracts and deploy a booking system thereby minimizing the need to print lots of documents. Every user has an important document folder that is synchronized online and hence minimize printing to have physical files as backup. Our printers are set to print in duplex by default. We dispose our waste paper with Takataka solutions for onward disposal to recycling paper companies. We also encourage our staff to carry lunch in re-useable containers thus reduce plastic use and waste. We also offer water dispensers in the office and our camps to avoid water in small plastic bottles. We offer picnic lunch boxes to guests in eco-friendly packaging.</p> <p> GWS Waste_recycling_policy_.doc</p>
<p>3.2. Sustainable purchasing Your company has an implemented purchasing policy, which favour sustainable suppliers and products, whenever these are available and of sufficient quality.</p>	✓	✓	<p>We are currently implementing a purchasing policy with the below key guidelines</p> <p>Centralised purchasing Bulk purchasing Local purchasing-by purchasing locally we keep a low carbon footprint as transport is of over minimal distance and help create local employment. Sustainability criteria: we are maintaining a supplier database based on sustainability criteria to determine priority.</p>

		PROCUREMENT POLICY AND PROCEDURES.docx
3.3. Office paper: type More than 90% of office paper use (internal and administrative use) has proven sustainability credentials (recycled, FSC or sustainably produced), when such options are locally available.	✓ ✓	<p>In Kenya there are no paper recycling companies/factories especially on printing or photocopying papers, however we use Double A paper which uses fast growing trees planted by farmers on unused land between rice paddies specifically for paper making.</p> <p>Double A paper has been certified as follows:</p> <p>ISO 90001:2008(quality management system) cert. No. AJA01/3133 ISO14001:2004(environment management standard) cert. No. AJA97/1088</p> office paper.1.pdf
3.4. Office paper: printing Copy and printing machines are set by default to double-sided printing (duplex) or other forms of paper saving modes.	✓ ✓	Yes. This is in our waste reduction Policy too. We use 02 leased photocopiers which are centralised and used across departments.
3.5. Certified coffee and tea At least 50% (in kilo or value) of coffee and tea provided in the office is fairtrade, organic, grown in the country or has another recognised sustainability certification.	✓ ✓	<p>Gamewatchers uses local made tea and coffee.</p> <p>At the office we purchase Dormans coffee who are the leading coffee roaster and exporter and a recognised quality brand. Dormans support coffee farmers across Kenya and sustainability plus ethical sourcing are key elements of their buying policy. Dormans coffee provides assurance that farmers receive a fair share of industry benefits, workers along the chain have good working conditions and apply practices which prohibit child or forced labor. This initiative aims at making a positive impact on the livelihood of farmers and</p> <p>We also purchase Kericho tea bags that are special blend from tea plantations across Kenya. The company blending and packing facility in Mombasa is BRC certified by SGS, organic certified by soil association, ISO9001:2008 certified</p>

		<p>by bureau veritas certification, fairtrade certified by FLO-CERT GmbH, and is E.T.I (ethical trading initiative) Base Code compliant.</p> <p> Coffee.jpg</p> <p> Office coffee.jpg</p> <p> Office Tea.jpg</p>
<p>3.6. Office supplies Other office supplies (e.g. pens, furniture) are labelled sustainable or are locally produced.</p>	<p>✓ —</p>	<p>We purchase products certified by KEBS and are locally manufactured where available. See below examples (all have the Global Recycling Standard label)</p> <p>We use HB pencils made in Kenya and are recyclable. We use Pelikan and Golden Star Markers which are recyclable. We use Flair pens made in Kenya. We use 60% recycled plastic containers that are non-toxic and solvent-free. Water washable</p> <p> Office pens.jpg</p> <p> Office Glue.jpg</p> <p> Office Glue _2_.jpg</p>
<p>3.7. Bulk purchasing Products are purchased in bulk to reduce the amount of packaging materials.</p>	<p>✓ ✓</p>	<p>We have consolidated our purchasing for all our camps and the head office at offices in Nairobi with only locally available products purchased by the camps within their locality.</p> <p>As such we purchase in bulk thereby:</p> <p>Reduce waste from packaging materials Reduce our carbon footprint due to the reduced transport mileage It's cheaper We re-use storage containers to re-package for the various outlets It's interactive; allows us to gauge our suppliers</p>

			sustainability ethos and at the same time influence them to change where necessary.
3.8. Catering Catering works sustainable and offers a large range of local, organic, MSC, fairtrade and healthy food.	✓	✓	We do not offer catering to staff in the office. We however, encourage our staff to bring their own packed lunch with reusable containers to the office.
3.9. Local goods and services The company buys locally and sustainably produced goods and services, if available.	✓	✓	At our Porini Mara camp , for example, we have a contract to source local milk, honey, and meat for our staff from the local community each week. And we always look for ways to support our Kenyan farmers and ranchers when we supply our camps. This is inline with our procurement policy to source good locally and promote local business. For our head office, a majority of products used are sourced locally a reported already for office supplies, tea and coffee.
3.10. Giveaways Sustainability criteria are considered for giveaways and merchandise.	✓	✓	We give our repeat guests souvenirs and as well all guests receive a branded water bottle. For the repeat guests the criteria to picking a gift is made from the below considerations; Recycled: Products made primarily of recycled materials or upcycled from scraps of previous products. Fair Trade: Products from companies that are members of the Fair Trade Federation, Fair Trade America, the World Fair Trade Organization, or Fairtrade International Artisan: Products that are handmade by individual, skilled craftsmen and women using high-quality materials and ingredients, without the benefit of modern manufacturing.

		<p>Made in Kenya: purchase local products</p> <p>Reusable: Consider Products that can be used over and over again to replace their disposable counterparts.</p>
<p>3.11. Cleaning materials Cleaning materials are non-hazardous, non-eutrophic, biodegradable and eco-labelled, when locally available.</p>	<p>✓ ✓</p>	<p>At the head office we use a local product manufactured by Blue ring limited based in Nairobi. The product BIOCLEAN heavy duty bio-degradable all purpose cleaner.</p> <p>BIOCLEAN VISION is to Partner and support their customers in achieving the highest levels of environmental hygiene in doing this, they aim to promote those products and systems that emphasize efficiency, cost effectiveness, safety and environmental considerations.</p> <p> Office cleaning material.jpg</p>
<p>3.12. Other purchasing practices Other sustainable purchasing practices are in place.</p>	<p>✓ —</p>	<p>We give preference to products & services that have been produced with respect for people and the environment (that are local, organic, fairtrade and/or recycled), as well as to service providers who have implemented a sustainability policy.</p> <p>We also:</p> <p>Purchase in bulk Comply with environmental and social legislation We give preference to products that are recyclable We purchase locally to involve the local business community We are in compliance with national and international sustainability standards and regulations</p>



Paper (promotional materials)

3

Action			Details
<p>3.13. Printing company The printing company works with a certified environmental management system (e.g. ISO 14001, EMAS).</p>	✓	✓	<p>We use executive printers who have a high volume production printer. This high-volume production printer eliminates offset printing by outputting on continuous form rolls of white paper, using environmentally friendly inks. As a result, there are no negatives, plates, oil-based inks or harmful cleaning solvents needed.</p> <p>We also have shared with them our sustainability ethos, and confirmed that they operate legally with all permits and licences and are compliant with Kenya's labor laws thus ensure to pay above minimum wage, no child or forced labor, pay for overtime and have an elaborate waste disposal system.</p> <p>100</p>
<p>3.14. Promotional materials Brochures are printed on environmentally friendly paper (recycled, FSC or chlorine free) for more than 50% of total corporate use (in kilos, pages or costs).</p>	✓	✓	<p>We use 170gsm matt art paper for our brochures, this Art paper is a woodfree coated digital paper.</p> <p>This paper is absorbs less ink and as we print maps on both sides is more durable. The maps are a useful resource and we found many clients keep this brochure so as to use the maps for reference.</p> <p>100</p>

			 166 Gamewatchers Brochures _3_.pdf
3.15. Efficient brochure use The company has implemented measures to reduce brochure wastage. The amount of brochures is measured on an annual basis.	✓	✓	<p>We have done a new brochure which is also a map and we find this results in more clients keeping and using it. than disposing it as they then need to use the map as a source of reference. Also for trade shows we are more and more into use of digital presentations with links that we can share for future reference rather than printing brochures.</p> <p>Our brochure is one huge sized A1 paper folded severally to make it less bulky.</p> <p>We use approximately 350 brochures every yearly quarter as more and more guest just rely on the digital information.</p>

Energy



Action			Details
3.16. Energy reduction policy The company has an active commitment to reduce energy consumption, which is monitored and implemented. All measurements, with a reasonable return on investment, are planned and implemented.	✓	✓	<p>We've changed all the bulbs in the office to LED energy saving bulbs.</p> <p>We are also implementing a lights off policy where we encourage staff to use natural light in the office during the day.</p> <p>We also have replaced all old desktop monitors for LCD screens, further to this we are now purchasing all in one desktop computers that are saving us considerable energy as they only require energy to power on the screen, they have no CPU unit.</p> <p>Our generator is automatic to minimise it running when power is back.</p>

			<p>All computers and printers are switched off when leaving work. our latest printers are Energy Star compliant. This means less C02 is produced in providing the energy needed to run device, they also have an ultra sleep mode, so are lirerally off when not in use. Similarly our pc's are set to go to sleep after 15 minutes of in-activity</p> <p>We measure our energy use from the monthly bills and have a goal to</p> <p>We will reduce printing paper usage by 40% in the next year. We will reduce waste from the office by 25 % over a year. We will reduce energy bills in the office by 15% over a year. We will reduce water usage by 10% over a year.</p>
<p>3.17. Energy consumption and sources Energy consumption for heating and electricity is measured by type and total of green house gases and/or carbon emissions. Different periods are compared with the aim to reduce emissions.</p>	✓	✓	<p>We are in a rented office.</p>
<p>3.18. Energy audit A building energy audit has been conducted by an approved company and its advice is implemented.</p>	✓	—	<p>We have rented our office and we are yet to bring about energy audit.</p>
<p>3.19. Sustainable energy Where available and practical, sustainable (green) energy is purchased or locally produced for use by the business.</p>	✓	✓	<p>In Kenya power is provided by the national electricitiy company. In Kenya 80 % of electricity is produced thourgh sustainable sources such as Geothermal, Hydro, Solar and wind.</p> <p>In Kenya power is provided by the national electricitiy company. In Kenya 80 % of electricity is produced thourgh sustainable sources such as Geothermal, Hydro, Solar and wind.</p>

		<p>As the office is rented we do not want to incur the cost of installing solar, however at our camps that we own, they are all solar powered.</p>
<p>3.20. Carbon offset CO2 emissions from fossil energy used in the offices are offset.</p>	<p>✓</p>	<p>— We lease large areas (over 100,000 acres) of grassland and forest habitat which is a huge carbon sink and we are in the process of seeing if we can get the carbon measured, however it is significantly more than our CO2 emission.</p> <p>Further to this we have now a tree planting project in Ol kinyei and Selenkay conservancies.</p> <p>We also have volunteer donations to Asilia foundation on a tree planting activity by the end of November for the purposes of carbon offset.</p> <p>The acreage of the conservancies we are in has been growing every year in tandem with the growth of the company.</p> <p>Our chosen local airline, Safarilink also Partners with <i>Mt Kenya Trust</i> in an afforestation program that also serves as our carbon offset program. Through this program, the MKT has planted over 5000 seedlings within Irangi and 13,5000 seedlings at Ontulili Forest station site. The Trust had been working with women groups at the Irangi site since 2003, but support from Safarilink allowed for planting work to start of the Ontulili Forest station site by engaging two new women's groups and working with local Kenya Forest Service forester in the area.</p>
<p>3.21. Energy efficient lighting At least 75% of lighting is energy efficient (class A: KLLs, LEDs, T-8s, or T-5s), including outside and parking spaces.</p>	<p>✓</p>	<p>✓ We have avoided relying on generators to provide power to the camps. Instead we have opted for a GREEN solar power system which provides all lighting to the tents. The solar panels charge a series of solar batteries and a step-up transformer converts this to</p>

		<p>220v. We also run our radio communication equipment from this as well as providing outlets to charge guest appliances such as laptops, phones and camera batteries. The camp kitchen refrigeration is also powered by solar or by gas fridges.</p> <p>We use LED lights that save energy in the head office.</p>
<p>3.22. Automatic switch on/off system An automatic switch on/off system is operational in locations where it's practically feasible (e.g. with timers or movement sensors).</p>	<p>- -</p>	<p>We do not have an automatic switch on/off system in operation but we:</p> <p>use natural day light no lights turn on during the day we've enabled our computers to power saving mode after few minutes on inactive.</p>
<p>3.23. Equipment "switch-off" policy Equipments (including aircon) are switched off after office hours or during lunch breaks (and, not on sleep modes), whenever feasible.</p>	<p>✓ ✓</p>	<p>We encourage shutting down of computers over lunch break or staff will be away for extended periods during the day.</p> <p>We encourage staff to always switch off equipment when not in use; Just like with lights, we ask staff to make sure that they switch off and plug out all equipment when not in use.</p>
<p>3.24. Light "switch-off" policy Office lights are switched off after office hours.</p>	<p>✓ ✓</p>	<p>Every staff is responsible for shutting down completely of their computer in the evening when they leave the office. In the event this is not done, our office caretaker has a duty to cross check and switch off any computer that is left on and report to the HR and ADMIN Manager for further warning and instructions to enforce this policy.</p>

<p>3.25. Low energy equipment When buying new equipment, the company gives preference to low energy equipment, based on highest local available standards (taking into account return on investment and quality considerations).</p>	✓	✓	<p>1.We have avoided relying on generators to provide power to the camps - and instead have opted for a GREEN solar power system .</p> <p>2.Also in our offices when when buying we consider low energy consuming equipments.eg LED light and energy saving labels on our products which also go into "sleep" mode when idle. for Example;</p> <p>we are currently using a samsung clx -9251printer, that is leased from copy cat Ltd. being leased means after a year we can request newer printers with even more advanced eco settings and that the printer is regularly serviced and maintained. They also manage the toner waste and take bacl the empty toner cartilidges for re-use. we choose this option as it is cheaper than having individual printers and also e-waste is reduced as incase of serious breakdown, copy cat will use this for spares and recyle parts of it. It is energy efficient and can print on duplex. It also has an elaborate counter for copies and print outs which enables us to see how much paper is being used in the office and thus its easier to set goals to reduce paper use.</p>
<p>3.26. Efficiency mode Where applicable, equipments are set by default to the energy-saving mode.</p>	✓	✓	<p>All computers and printers are by default on energy saving mode, and timings to go on standby reduced. Staff are continuously encouraged to switch off when they will be away for extended periods of time.</p>
<p>3.27. Other measures Other measures, not previously mentioned, have been implemented.</p>	✓	—	<p>Kuni briquettes are an ingenious solution. They are compressed blocks of sawdust, rice husks, straw chaff, and other easily combustible natural materials that don't rely on felling trees. We encourage use of this to our staff for their use at home and use this for our camps.</p>



Kuni_briquettes.jpg

Water

9

Action			Details
<p>3.28. Water reduction policy The company has implemented a policy to reduce its water consumption, which is monitored and based on a water risk assessment. In areas of high water risk, context-based water stewardship goals are identified and pursued.</p>	✓	✓	<p>In the camps we have we have water saving toilets. We also use bucket showers. saving considerable amounts of water.</p> <p>In the office, though leased we have implemented rain harvesting system and as well measure our usage from the water bills and meter readings. we also purchase water and record the amounts purchased.</p> <p>We will reduce water usage by 10% over a year. We have our caretaker charged with identifying water leaks and ensuring the same are repaired as quickly as possible</p> <p>As we are in a rented premise, request for pressure reduction valves and flow regulators/restrictors in the next refurbishment cycle. Car washing is not permitted in the offices.</p>
<p>3.29. Water sourcing Water sourcing is sustainable and does not harm environmental flows.</p>	✓	✓	<p>Nairobi City Water and Sewerage Company is an ISO 9001 certified institution that is purely tasked with providing water and sewerage services to the residents of Nairobi thus we trust the source since the company complies with kenya governmet regulations and with ISO.</p>

<p>3.30. Water use The office water use is measured on a monthly or yearly basis for benchmark purposes, and sources of water are indicated.</p>	<p>✓</p>	<p>✓</p>	<p>We measure our usage by the monthly bill and meter readings as this is supplied by the government via the city council. Where we purchase water as sometimes, the council water is rationed. We record the dates and amount purchased in a book. This advises us on the amount of water we consume per month and helps us in our plan to reduce the same. (We will reduce water usage by 10% over a year.)</p> <p>At our camps we use 20-liter bucket showers because we know water conservation is essential to living in harmony with our environment. (Even our flushing toilets are specially adapted to save water—our water conservation policy affects every aspect of safari camp life)</p> <p> Water Bill.pdf</p> <p> Nairobi city water bill.pdf</p> <p> Bucket shower.jpg</p>
<p>3.31. Flow restrictors Flow restrictors are installed in minimum 75 % of the taps.</p>	<p>✓</p>	<p>—</p>	<p>We are in a rented building. we have however requested this to be considered in the next renovations.</p>
<p>3.32. Aerators Aerators are installed.</p>	<p>✓</p>	<p>—</p>	<p>We are in a rented building where we are limited in the changes we can make.</p>
<p>3.33. Percussion taps Percussion taps, or other water saving technologies, are installed in min. 75 % of all taps.</p>	<p>✓</p>	<p>—</p>	<p>Unfortunately we are in a rented building. We have however requested this to be considered in the next renovations.</p>

3.34. Water saving toilets Dual flush or other water saving equipment is installed in the toilets	✓	✓	We are in a rented building. However we have already some toilets modified to Dual flush and hope more will be changed in the next round of renovations.
3.35. Rain water Waste water and/or collected rain water is re-used.	✓	—	We have adopted rain water harvesting in the camps that we own. In our head office , though we are in a rented building we are collecting water and hope to add more gutters to collect as much as possible with the permission of the owner.
3.36. Other examples Other water-saving measures, not previously mentioned, have been implemented.	✓	—	<ol style="list-style-type: none"> 1. For the Camps that we own, 4 water filters were donated to the company through Unilver Kenya. These water filters have been donated 2 villages located close to Ol kinyei conservancies in order to improve access to safe drinking water. 2. in our camps, sw recycle and repurpose glass wine bottles decorated with locally made beadwork to serve drinking water in our guest tents and avoid plastic bottles. 3. At the camps that we own, we use “bucket showers”, also known as “safari showers” in the guest tents’ en-suite bathrooms to avoid wasting water.

Waste management

Action			Details
<p>3.37. Waste legislation The company complies with the national legislation concerning waste disposal. Any residual waste disposal has no adverse effect on the local population and the environment.</p>			<p>We employ a professional lincensed company with kenya legistration covered under <i>Environmental Management and Coordination Act-Waste Management Regulations, 2006</i>. These regulations govern licensing, re-use, recycling, segregation and transportation of waste.</p> <p>We have implemented a recycling system for all waste - this is segregated into certain categories [Glass, plastics, metals and tins, used oil, mineral water bottles, used batteries,paper waste, and all bio-degradable waste] The segregated waste is then treated accordingly - the bio-degradable waste is composted in a closed and locked pit - and the remainder is packed and then transported back to Nairobi for proper disposal with Taka taka solutions who recycle 95% of the waste that they collect.</p> <p>Examples of recycled products are PET bottles made into fleece jackets, glass bottles made into glasses, news paper recycled into tissues and aluminium tins recycled to make new aluminium tins.</p>
<p>3.38. Waste reduction The company has developed and implemented a solid waste reduction and recycling policy with quantitative goals to reduce non re-useable or recyclable waste (for example reuse or recycling of coffee cups, double sided printing, bulk purchasing).</p>			<p>We have minimised the use of plastic by installing of water filter for our drinking water needs in the office. we duplex print whener possible to minimise on paper and we have contracted Taka Kenya as they separate waste and recycle as much as possible. we also have centralised our procurement to allow for bulk purchasing.</p> <p> GWS Waste _recycling_policy_.doc</p>
<p>3.39. Waste measurement and benchmark The business is aware and keeps records of the type and amount of</p>			<p>In our head office we have the following measure take and recorded so as to optimimize our business:</p>

<p>substantial portions solid waste generated (including food waste).</p>		<p>A requisition form which must be filled by the User Department and enlist all the items they require- printing papers, writing pens, calculators, foy tissue, staplers, paper clips etc. depending on the departmental need. This data is recorded to advise on usage and is the basis for our goals to reduce paper use in the office by 40% in the next year. We do not offer catering in the office. However at our camps all waste is measured: We have implemented a recycling system for all waste from the camps – this is segregated into certain categories [Glass, plastics, metals and tins, used oil, mineral water bottles, used batteries, paper waste, and all bio-degradable waste] The segregated waste is then treated accordingly – the bio-degradable waste is composted in a closed and locked pit – and the remainder is packed and then transported back to Nairobi for proper disposal. The recording of supplies ordered from the office stores must be approved by a line manager - who is thus responsible in case of misuse and wastage.</p>
<p>3.40. Sustainable packaging The company has taken measures to reduce the amount of packaging materials and is not providing non-recyclable or non-biodegradable package materials.</p>	<p>✓ —</p>	<p>We do not package our brochures, any gifts purchased are wrapped in recyclable paper whenever necessary, often no wrappings are done as we mostly give books as gifts.</p> <p>For picnics</p>
<p>3.41. Plastic water bottles The business takes action to reduce the amount of (non-refillable) plastic bottles it consumes. This criterion is related to drinking water for office use.</p>	<p>✓ —</p>	<p>We have installed a filter in the office to cater for drinking water and encourage staff to bring a refillable water bottle. We filter water from the main city supply, as the government has banned single use of plastic we as Gamewatchers use steel reusable bottles for our guest on safaris at the camps, which they can take away as souvenirs and hopefully keep using even at home and avoid plastics. At our camps we recycle and repurpose glass wine bottles decorated with locally made beadwork to serve drinking water in our guest tents and avoid plastic bottles. We have partnered with Ubuntu who supply our drinking water at the camps. Ubuntu Life Water is not just a water bottling enterprise - it empowers the community to thrive, provides the lifeblood of health in their CSR</p>

			<p>pediatric programs which effect over 1,500 children and their families, and creates meaningful jobs.</p>  Recycle bottle.jpg
<p>3.42. Reuse / recycling of waste The business demonstrates that it separates all materials which can be recycled or reused (including glass, paper, metal, organic waste and plastics). It organizes collection and proper disposal, whenever locally feasible, if collection is not provided by the local authorities.</p>	✓	✓	<p>We are sustainably managing our waste and carefully separate our: Metals Plastics Paper, and glass.</p> <p>from the camps, we store our waste in secure wildlife-proof containers and then send it all back to Nairobi for re-cycling. This protects our local bird and wildlife population from consuming any harmful substances</p>
<p>3.43. Toner/ink When using ink and toner cartridges for printing and copying, waste reducing methods (recycling, refilling) are implemented, whenever feasible.</p>	✓	✓	<p>We currently have leased printers from copycat who recycle cartridges. The printers also collect water toner in a separate bin, which they take for disposal and recycling.</p>
<p>3.44. Recycling of batteries Batteries, including powercut inverter batteries, are recycled (if locally possible) or properly disposed.</p>	✓	✓	<p>Our used Car batteries are taken back by Chloride Exide Company. Which is now ISO 9001:2015 certified for proper disposal and recycling.</p>

Reducing pollution

Action			Details
<p>3.45. Waste water: treatment Wastewater, including grey water, is effectively treated, complies with national legislation and is only reused or released safely, with no adverse effects on the local population and the environment.</p>			<p>We are on the city sewerage line for our office. . In Kenya mainly waste water is managed through the use of septic system. Law requires effluent discharge tests to be undertaken and effluent license issued. <i>Environmental Management and Coordination (Water Quality) Regulations of 2006</i></p> <p>At our camps and the reason we answered yes, ensure that sewage is conveyed to an underground septic tank for each tent so that it is treated and does not pollute the groundwater.</p>
<p>3.46. Pollution reduction policy The company has a policy to minimize and substitute the use of harmful substances, including pesticides, paints, and cleaning materials, by harmless products and processes. All storage, handling and disposal of chemicals is properly managed.</p>			<p>Where possible we minimize all storage ,handling and disposal of chemical waste with aim to minimize harmfulness, and those that we use are as below;</p> <p>We use organic soap (see image attached) for cleaning in the office At our camps we use bolt insecticide as its locally manufactured and made from 100% pyrethrum sourced from Kenya, The natural ingredients make it completely safe for use and helps in the fight against malaria by eradicating mosquitoes.</p> <p> Office cleaning material.jpg</p>
<p>3.47. Paint Lead-free and water-based paints are both used inside and outside, when locally available.</p>			<p>All painting is done by the landlord and we encourage environmental friendly products. the walls have</p>
<p>3.48. Noise, light, erosion and ozone</p>			<p>We are in an office environment and have little noise pollution. we ensure the drainage</p>

If the company is a source of pollution, it implements practices to minimise pollution from noise, electric generators, light, runoff, erosion, ozone-depleting compounds; and air, water and soil contaminants from its buildings (as far as being able to control by the company).

is well maintained thus have no runoff thus no erosion.

Mobility

7

Action			Details
3.49. Staff travel policy The company has a sustainability mobility policy for staff related travel, which includes reduction of travel and more sustainable modes of transport.			On our on going sustainable policy adaption .We are encouraging employees on the use greener mode of transport and to car pool whenever possible. The company does not provide staff transport. The internet is fast improving - we arrange skype calls for our overseas team and online trainings for the softwares we have deployed reducing the need to bring people on haul to the physical office. We also are in the process of moving our systems to the cloud to enable staff to work from anywhere.
3.50. Business travel emission Staff related business travel is measured (type, distance). Carbon or Green House Gas emissions are calculated, with the aim to reduce and offset.			We do not encourage unnecessary travel. We have kept our marketing trips at a minimum instead relying on representation by staff in those destinations already.
3.51. Business travel carbon offset Carbon or Green House Gas emissions of staff related travel is offset, through a reliable locally available scheme or methodology.			The grassland and forest lands that we lease and protect help to compensate for any business related travel. However we are bringing on board the tree planting initiative in our conservancies to further offset our carbon emissions. A study from the University of California, Davis, found that grasslands and rangelands are more resilient carbon sinks than forests in 21st century.

<p>3.52. Employee incentives Employees are (financially) encouraged to use public transport or sustainable means of transport (e.g. bicycles).</p>	✓	✓	<p>We have implemented a sustainability award that we will once a month highlight one sustainable thing a member of staff is doing, we will highlight use of public transport to raise awareness amongst staff.</p>
<p>3.53. Transport reduction Transport related impacts are reduced by tele-work, tele/video meetings, work-at-home policies or other means.</p>	✓	—	<p>We intend to adapt in the future transport related impacts, however we encourage our staff sharing of cars to work or while heading home.</p> <p>Our overseas staff all work from home negating transport needs to travel to a physical location daily.</p> <p>We encourage, Skype calls for meetings and have the skype contacts for all our sales staff as part of their email signatures. We also share data in whatsapp groups and google docs to avoid physical posting of data or travel for meetings to discuss this documents.</p>
<p>3.54. Car purchase or lease If the company buys, leases or hires cars, there is a policy to obtain the greatest fuel-efficiency (e.g. EU category A or B).</p>	✓	—	<p>We always purchase the latest cars, this means every vehicle purchase is meticulously planned for. We also ensure the vehicles are well maintained.</p> <p>We have a fleet of 12 safari vehicles.</p>
<p>3.55. Well maintained cars Motorised company vehicles are well maintained and checked regularly to reduce emissions and energy use. They comply with the legal emission standards.</p>	✓	—	<p>Company vehicles are well maintained and our operations manager tasked with ensuring the cars are services on time. Other than that we have in our drivers contracts the following:</p> <p>Tyres. Tyres MUST be correctly inflated to the vehicle manufacturer's specification for the load being carried. Tyres should also be free from certain cuts and other defects</p>

		<p>If a tyre bursts while you are driving, try to keep control of your vehicle. Grip the steering wheel firmly and allow the vehicle to roll to a stop at the side of the road.</p> <p>If you have a flat tyre, stop as soon as it is safe to do so. Only change the tyre if you can do so without putting yourself or others at risk – otherwise call for assistance.</p> <p>Tyre pressures. Check weekly. Do this before your journey, when tyres are cold. Warm or hot tyres may give a misleading reading.</p> <p>Your brakes and steering will be adversely affected by under-inflated or over-inflated tyres. Excessive or uneven tyre wear may be caused by faults in the braking or suspension systems, or wheels which are out of alignment. Have these faults corrected as soon as possible.</p> <p>Fluid levels. Check the fluid levels in your vehicle at least weekly. Low brake fluid may result in brake failure and a crash. Make sure you recognise the low fluid warning lights if your vehicle has them fitted.</p> <p>This is in a bid to ensure we are compliant with all standards and as well efficient in our operations.</p>
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Sustainability training and awareness raising

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Action			Details
<p>3.56. Staff environmental training and information All staff members (including field staff) receive periodic guidance, training and/or information about their roles and responsibilities with respect to environmental practices, including water, energy saving, paper, and waste issues.</p>	✓	✓	<p>We have initiated periodical inhouse meetings and sustainability conservation chats with all staff to educate them on their responsibilities in the office and explain why the company is implementing various initiatives to ensure sustainability. For example:</p> <p style="padding-left: 40px;">We have done away with non organic soaps in the offices. We switch off</p>

		<p>electricity while not in use. We recycle paper and carry water refillable bottles. We have incorporated our sustainability policies, some that are new to our employee handbook We have had industry leaders in conservation come in and talk to staff, we hope to do this once monthly on topics selected by the sustainability committee.</p>
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Land use and community relations

10

Action			Details
<p>3.57. Land use and construction Planning, land use, siting, design, construction, renovation, operation and demolition are in compliance with zoning requirements, with laws related to protected and sensitive areas, and to heritage considerations.</p>	✓	✓	<p>We are in a rented facilities. The land use is however controlled by the government and we are in compliance with all the necessary permits for our operation. In Kenya, Land use is strictly regulated.</p>
<p>3.58. Siting and design Siting, planning and design of newly constructed company buildings takes into account the capacity and integrity of protected and sensitive natural and cultural heritage, and complies with zoning requirements and laws. Best practices should be implemented within reasonable extra costs.</p>	✓	✓	<p>We are on leased propety.</p>
<p>3.59. Natural and cultural impact In case of new constructions (or substantial renovations or demolitions), an environmental, natural and cultural impact assessment has been conducted. Its conclusions and recommendations are taken into account.</p>	✓	✓	<p>Since we are nature ambassadors, We are committed to protecting the natural flora and fauna found in the areas in which we operate. Our tented camps, purposefully, have no permanent structures and are strategically placed around the available trees and shrubs. Our offices are rentals and in case of renovation we consider environment in our recommendations to the landlord .</p>

<p>3.60. Property acquisition Property and water rights have been acquired in a legal manner, complying with local, communal and indigenous rights (where applicable). Property has been acquired including free, prior and informed consent of local communities, and do not require involuntary resettlement.</p>	✓	✓	<p>We are in Rented premises, hower part of our operation involves management of land leased from Local communities. the leasing has beem done leagally and in consent with the local communities. here is a brief on how the lease came about over 20 years ago.</p> <p>How we started the Conservancy Concept</p> <p>In 1997 we signed an agreement with a Maasai community to establish the first Conservancy (Selenkay) on 13,000 acres of their land. Following the success of Selenkay Conservancy, in 2005 the 17,500 acre Ol Kinyei Conservancy was set up in the Mara eco-system and in 2006 the 22,000 acre Olare Motorogi Conservancy was set up in another part of the Mara.</p> <p>These were followed by the establishment of two more conservancies in the Mara: the 11,000 acre Motorogi Conservancy and the 50,000 acre Naboisho Conservancy. We have now renamed the Olare Orok Conservancy and Motorogi Conservancy to Olare Motorogi Conservancy as it proudly sits at 33,000 acres.</p> <p>The areas to be used as conservancies were chosen by the Maasai landowners and then were vacated by the community and set aside for wildlife so that they could be utilised for eco-tourism to generate an income and economic benefits for the community</p>
<p>3.61. Sustainable design and construction Planning, design, construction of new buildings or renovations (from the moment of first certification) is based on locally appropriate and sustainable practices and materials.</p>	✓	✓	<p>We are tenant,however our aim is to work closely with communities living alongside national parks and wildlife reserves to help them derive benefits from conserving wildlife species and the indigenous habitat.</p>

<p>3.62. Invasive species The business takes measures to avoid the introduction of invasive alien species. Native species are used for landscaping and restoration, wherever feasible, particularly in natural landscapes.</p>	✓	✓	
<p>3.63. Community consultation Local communities are consulted, regarding activities that the business conducts in areas where it resides, with the aim to avoid adverse effects on local access to livelihoods, including land and aquatic resource use, rights-of-way, transport and housing.</p>	✓	✓	<p>We are tenants, however the landlord is compliant with all laws, to the best of our knowledge all licenses have been obtained legally and transparently.</p> <p>For our camps; Our partnership with the local communities in setting up the conservancies has made a significant contribution to improving conservation of the wildlife and habitat of these areas. This is only possible through involving the local communities, so they too derive benefits from tourism, in this regard consultations are always ongoing.</p>
<p>3.64. Community services The activities of the company do not jeopardize the provision of basic services, such as food water, energy, healthcare or sanitation, to neighboring communities.</p>	✓	✓	<p>Our head office has no conflicts with the local community, our activities do not conflict or jeopardize provision of basic services.</p> <p>As a result of our camps; there are over 1,000 Maasai families who are directly benefiting from our conservancies - their lives have greatly improved with a guaranteed income from the lease and less reliance on livestock as their sole income source.</p> <p>Previously, opportunities for jobs were almost non-existent, especially at Selenkay, but the camps and conservancies now employ over 140 members from the communities. Take-home earnings of individual members are over USD105 per month even for the most junior staff which is significantly higher than average in rural areas.</p> <p>Our five Conservancies have provided a solution to this problem by providing additional income and alternative livelihood opportunities to livestock ranching.</p>
<p>3.65. Local cultural sites</p>	✓	✓	<p>We support activities that raise awareness to conservation within our city and are</p>

<p>The business contributes to the protection, preservation and enhancement of properties, sites and traditions of historical, archaeological, cultural, and spiritual significance and does not impede access to them by local residents.</p>			<p>members of FONNAP for instance that cares for the Nairobi National Park. Our aim is to work closely with communities living alongside national parks and wildlife reserves to help them derive benefits from conserving wildlife species and the indigenous habitat. They do this by earning an income from eco-tourism through setting aside areas of their land as wildlife conservancies and thereby creating wildlife dispersal areas outside the parks, increasing wildlife numbers and species variety, habitat and bio-diversity.</p>
<p>3.66. Local elements The business values and incorporates authentic local culture (traditional and contemporary) in its operations, design, decoration, cuisine, or shops; while respecting the intellectual property rights of local communities.</p>	<p>✓</p>	<p>✓</p>	<p>Our Porini camp concept is a partnership between the local community and a commercial safari operator, where both parties' goals are aligned. We believe that one of the keys to our success is recognizing that the community must derive fair benefits and not be taken advantage of the local community.</p>

4. Inbound partner agencies

16

Inbound partner agencies

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Action			Details
<p>4.1. Partner agency policy Based on an inventory of its inbound key partner agencies, the company has developed and implemented a policy to improve the sustainability of its partner agencies. It should include the motivation of existing partner agents, as well as the selection of new partner agents.</p>	✓	✓	<p>Since engagement with Travelife, we have implemented a sustainability criteria to go with our contracting.</p> <p>We specialise in delivering tailored safaris to small camps and lodges in East Africa. We are committed to helping preserve Africa's unique wildlife, landscapes and local communities. We believe that the best way to do this is through sustainable ecotourism ventures that benefit the local communities and give our guests a rewarding experience. Our Porini group of camps is a sustainable model that practically implements these principles.</p>
<p>4.2. Communication to partners The key partners agencies are informed about the company's sustainability policy and are expected to comply with it and/or communicate it to final customers (where relevant).</p>	✓	✓	<p>We inform our partners on sustainability policy via our website, more so by asking questions on our contracts on how they area sustainably committed to the environment, employes wages, child labor etc .With the questions answered we can now have a choice of partners we can work with .</p>
<p>4.3. Contract conditions Key sustainability clause(s) are included in contracts with inbound / receptive partners (e.g. child labour, anti-corruption and bribery, waste management and protection of biodiversity). In case written</p>	✓	✓	<p>Gamewatchers Safaris is committed to complying with all laws and regulations which govern our operations in Kenya. This Anti-Bribery Policy explains our individual responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.</p>

contracts do not exist, these clauses are communicated and documented otherwise (e.g. through policy on the company web site, correspondence etc.).			
4.4. Sustainability training - motivation Incoming/inbound partners are motivated to participate in sustainability training(s) for travel companies.	✓	✓	We are encouraging suppliers to take part to the Travelife initiative by respecting sustainable tourism principles. We also encourage them to use Travelife tool to check their performance evaluation.
4.5. Sustainability training - completed Key receptive partners have completed a basic sustainability training for travel companies.	✓	✓	
4.6. Sustainability reporting The key partners have reported on their sustainability achievements and have shared their results.	✓	✓	For now we do not have this format criteria in place.
4.7. Sustainability award The key partners have obtained a sustainability award and have shared their achievements.	✓	✓	
4.8. Incentives Incentives are offered to receptive partner agencies who engage actively in more sustainable production (e.g. financial, contract conditions, marketing benefits).	✓	—	

Specific conditions

8

Action			Details
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<p>4.9. Contracts Written contracts with partner agencies are in place.</p>	<p>✓ ✓</p>	<p>The contracts are renewable on yearly basis, most running from January to December.</p> <p>These contracts cover the prices for the whole year and booking terms and conditions.</p> <p> GAMEWATCHERS AGENT CONTRACT.pdf</p>
<p>4.10. Briefing contract managers Receptive/incoming agents, outbound product and contract managers discuss relevant sustainability issues in the destination on a regular basis.</p>	<p>✓ —</p>	<p>We regularly communicate via email and within the contracts relevant sustainability issues and at the many national and international trade fairs that we attend.</p> <p>We also share our requirements for suppliers that we contract with to raise awareness on our ethos. These requirements are revised yearly to ensure we remain informed on the sustainability practises of our partners.</p> <p>Our Sustainability Cordinator is incharge of the product and contracting and marketing team, which further ensures relevant sustainability objectives are discussed and communicated to our key partners.</p> <p> GWS Suppliers Requirements.docx</p>
<p>4.11. Anti-corruption The company expects its partners to have an anti-corruption policy (e.g. through inclusion as contract condition).</p>	<p>✓ —</p>	<p>Gamewatchers Safaris is committed to complying with all laws and regulations which govern our operations in Kenya. This Anti-Bribery Policy explains our individual responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.</p> <p>The penalties for violating these laws can be severe, both for the Company and for the individuals involved, including significant corporate and individual fines, and imprisonment.</p> <p> Anti_bribery policy.docx</p>

			GWS Suppliers Requirements.docx
4.12. Sexual exploitation of children: contracting Partner contracts include clauses which enable contract partners to end the contractual agreement prematurely if the partner company does not take adequate measures to prevent sexual exploitation of children within the direct supply chain (e.g. accommodations and excursions).	✓	✓	Section 3 of our partner contracts its mention that suppliers should take measures against sexual exploitation of children. Gamewatchers Safaris checklist for sustainable accommodation.docx
4.13. Licence Partner companies comply with local, national and international legislation and regulations.	✓	✓	All companies registered and issued with a PIN or VAT certificate which is indicated in the contract, this indicates that they have complied with necessary legislation and are duly registered. We aim to work with companies who are members of their local associations.
4.14. Customer communication In case partner agencies are directly in contact with clients, they provide information and interpretation on relevant sustainability matters in the destination (protection of flora & fauna and cultural heritage; resource use) and on social-cultural values (tips, dressing code and photography), including the distribution of customer codes of conduct.	✓	—	We have a code of conduct that we share with clients advising on the general information. Further to this the guides that are our abassadors whilst with the clients brief them on the same to ensure they understand our code of conduct. CODE OF CONDUCT ON SAFARI.docx
4.15. Labour conditions Partner companies comply with all relevant national laws protecting the rights of employees.	✓	✓	Yes. compliance with Labor laws is a requirement we request for. Gamewatchers Safaris checklist for sustainable accommodation.docx GWS Suppliers Requirements.docx

<p>4.16. Living wage The company partner agencies pay their employees at least a living wage that is equal to or above the legal minimum.</p>	<p>✓</p>	<p>✓</p>	<p>As mentioned in the contract section 2, partner agencies is expected to pay their employees at least living wages equal or above the legal minimum.</p> <p> Gamewatchers Safaris checklist for sustainable accommodation.docx</p>

5. Transport

9

Selecting transport suppliers

8

Action			Details
5.1. Transport to destination In selecting transport options to the destination, a policy is followed to select the most sustainable options (considering price and comfort arguments).	✓	✓	Usually interlinked to the budget of the client and with a limited choice between minivans and 4x4 cruisers for game drives. We use our supplier requirements matrix to select the most responsible company in the instances where we have to hire out or book flights into the parks/conservancies and national reserves.
5.2. GHG / Carbon offset GHG or Carbon offset for the international transport is included in the package price.	✓	✓	We do not offer international flights.
5.3. GHG / Carbon measurement The GHG or carbon emissions are measured for the transport to the destination with the aim to make informed decisions for product development and to inform clients.	✓	✓	We are inbound and are not offering international flights.
5.4. Transfer to departure airport Sustainable (public) transport is preferably included or offered to the point of departure for the international/long distance journey. This includes avoidance of short distance connection flights (in balance with price and comfort arguments).	✓	—	Unfortunately in Kenya our public transport system is not well developed and so as not to inconvenience our guests, we provide the transport to the airports. We encourage sharing of transfers and make it an available options to guests. We also have a policy of booking guests at hotels nearest or within the airport where the hotel then provides shared transfers to the airport. Kenya has recently completed a railway system between Nairobi and Mombasa and we

			offer this as an option for clients and an alternative to flying.
5.5. Local transport In selecting transport options for transfers and excursions in the destination, more sustainable alternatives are always considered and given preference to (taking into account price, comfort and practical considerations).	✓	✓	We use our supplier requirements policies to select the suppliers we use to provide transfers and excursions. Unfortunately for Kenya, we are limited to using either minivans or 4x4 safari vehicles. For comfort we prefer to use the 4x4 land cruisers as our road infrastructure in the parks and reserves is under developed.
5.6. Boating The business encourages any boat/cruise operator it works with, to follow sustainability best practices in respect of their operations.	✓	✓	Currently not offering any boating excursions directly.
5.7. Bus / Coach safety In selecting coach transport companies, minimum quality and safety arguments are considered.	✓	✓	<p>Usually the reservations and customer services team will conduct a physical quality check on any coaches that we lease for our guests.</p> <p>The supplier will be expected to meet our sustainability requirements and all legal requirements, and hence have well trained staff.</p> <p>In Kenya as a law, seat belts, first aid kit and training of the driver are a must, the driver cannot work for more than 8 hours by law.</p> <p>Coach Drivers as well must abide to our driver code of conduct and brief guests on their code of conduct too despite having appropriate signage in the car, like</p> <p style="text-align: center;">No standing on the seats Use of vehicle dustbin for any trash No smoking</p>
5.8. Code of conduct for drivers Transport providers are provided with codes of conduct and guidance regarding sustainable driving techniques.	✓	—	<p>Our Operations manager will conduct test drives or assign someone to do it on their behalf periodically and for every new driver to ascertain their competence.</p> <p>All drivers are provided with our code of conduct documents which they must</p>

sign to show they have read before being allocated a vehicle. At the camps that we own, we provide a spotter and a driver, so as not to distract the driver and offer a better experience for guests. Drivers are provided with training on vehicle handling, we this year took all our drivers to Toyota Kenya to be trained on how to handle the 4x4 vehicles in off road terrain by the vehicle manufacturers.



CODE OF CONDUCT DRIVERS AND GUIDES.docx



PORINI SAFARI CAMPS DRIVERS AND GUIDES CODE OF CONDUCT_Rev.docx

Sustainable packages

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Action			Details
<p>5.9. Sustainable packages The company has integrated and/or is promoting one or more sustainable holiday products/packages, based on a recognised methodology (including sustainable transport, sustainable accommodations and sustainable activities).</p>			<p>A significant part of our business is to our porini camps which have won local and international awards for sustainable tourism and a majority are rated Gold by ecitourism Kenya. We develop packages combining the various camps, to offer the clients the a sustainable safari. We promote these on our website. www.porini.com as well as in the rates that we email to them.</p> <p>We also email our top partners the eco rated facilities that we have a bias for in our marketing initiatives.</p>

6. Accommodations

16

Accommodations

9

Action			Details
<p>6.1. Sustainable accommodations policy The company has developed and implemented a long term strategy (with targets and timelines) to improve the sustainability of its contracted accommodations.</p>	✓	✓	<p>We emphasise on the more personalized and smaller safari camps, with high quality guides as we have found these to be the ones doing more to protect habitat and work with local communities.</p> <p>We also download and push more properties that are eco-rated by Eco tourism Kenya. We encourage all our accommodation suppliers to get rated,</p> <p>Starting this year, we also are sending a sustainability questionnaire to our accommodation suppliers to highlight our sustainability policy.</p> <p>We aim to have 70% of our business going to eco-rated facilities by the end of 2020. We also will have a member of our green team going on all sales famtrips to do an audit of our accommodation options.</p>
<p>6.2. Accommodation communication The company is clearly and actively communicating its sustainability objectives and requirements regarding accommodations to contracted and other relevant accommodations.</p>	✓	✓	<p>We have actively done this by informing them of our objectives of doing more business with sustainable accommodation and what they can do to become a preferred sustainable partner during the yearly contracting process.</p> <p>We also email them our sustainable accommodation checklist to fill. This year we have written to our main partners as below and are still continuing with the exercise.</p>

		<p>Elewana Camps Governors camps & beyond Asilia Sarova Serena Atua Enkop Sun Africa hotels</p> <p> Gamewatchers Safaris checklist for sustainable accommodation.docx</p>
<p>6.3. Certified accommodations Preference is given to accommodations that work with internationally acknowledged (e.g. GSTC recognised) and/or Travelife certification. The percentage of certified companies/overnight stays is measured, is growing and exceeds the market average.</p>	<p>✓ ✓</p>	<p>We currently give preference to ecorated facilities in Kenya, unfortunately these are only 80, hence raising awareness to get more into the rating scheme has been our priority. As such, we now send our sustainable accommodation checklist and expressly explain our bias for products with the lowest environmental and social impacts we also advice our preference to wherever possible, prefer products that have attributes or qualities that can be measured favourably against our checklist or those that have undergone third party verification.</p> <p>60 30</p>
<p>6.4. Contract conditions Basic/standard sustainability clause(s) are included in all contracts with accommodation providers (e.g. child labour, anti-corruption and bribery, waste management and protection of biodiversity). In case there are no (direct) contracts in place, the company has a mandatory policy (including sanctions) which is clearly communicated to partners and/or accommodation providers.</p>	<p>✓ ✓</p>	<p>Attached here is our Checklist for sustainable accomodations that we are sending all accomodation providers that we are wworking with.</p> <p>Question 3 reads; Do you have a child protection policy on child labour and sexual exploitation? (If yes, describe)</p> <p>Question 10 reads Do you separate and/ or recycle waste? (If yes, how)</p> <p>Question 7a reads: Do you have an environmental policy?</p>

		<p>(If yes, describe)</p> <p> Gamewatchers Safaris checklist for sustainable accommodation.docx</p>
<p>6.5. Distribution of 'Best practice' standards and guidance Best practice standards (e.g. Travelife) and other guidance towards more sustainable management (e.g. training manuals) are distributed to the bestselling accommodations.</p>	<p>✓ ✓</p>	<p>We share the below link with our top selling accommodations on email as guided by Travelife. http://gettingstarted.travelife.org/</p> <p>Our best selling accommodations are also already rated by Eco-tourism Kenya who share as well their criteria.</p> <p>25</p>
<p>6.6. Baseline / self-evaluation Contracted accommodations are required to self-evaluate their company on a regular basis and share this information with the tour operator (e.g. through the Travelife Sustainability System for hotels or other acknowledged programmes).</p>	<p>✓ —</p>	<p>Already we are working with eco-rated facilities. Our accommodations checklist expressly asks;</p> <p>Do you have a focal point/ person(s) responsible for implementation of your sustainability practices and environmental policies mentioned above? (If yes, provide name/s, and contacts)</p> <p>Thus far, we only have responses from the accommodations checklist. We are targeting to get at least 25% in the next year sharing their self evaluation with us as we know they are already doing the evaluation.</p>
<p>6.7. Participation to training/education Contracted accommodations are stimulated to participate in local or (inter)national sustainability training and education (in case these</p>	<p>✓ ✓</p>	<p>Most of our suppliers attend the annual Eco rated forum that trains on sustainability best practice, and some including our porini camps attend the STTA trainings.</p>

<p>trainings are offered in the destination).</p>		<p>We ask in our sustainable accommodations checklist -</p> <p>Do you support learning and development of your staff? (If yes, how)</p> <p>We also have a requirement in our supplier requirements file that;</p> <p style="padding-left: 40px;">The supplier shall train own staff and suppliers (hotels, restaurants, transportation and excursions and also tour leaders and representatives) to understand and implement higher sustainability standards and to evaluate and report progression regularly. “</p> <p>As we communicate the free tools available via travelife, we hope to get even more on board.</p>
<p>6.8. Collective actions Upon request, the company supports collaborative initiatives with other tour operators and/or stakeholders to promote sustainability among accommodations in destinations.</p>	<p>✓ ✓</p>	<p>We work with many other accomodation providers and operators on CSR projects with the community around the accomodations. For instance in the Mara we are active participants in the Maa Trust - a collaborative initiative working towards a harmonious balance between conservation and sustainable human development in the Maasai Mara.</p> <p>We other partners we actively support the Elephant Centre, an organisation making a global appeal to people who care about elephants and conservation – and seeks to establish and support Community Based Conservation Programs (CBCP) which have so far demonstrated the potential to conserve wildlife outside protected areas. These areas are; Loita Hills, Maasai Mara, Samburu, Meru, Amboseli and Tsavo larger ecosystem in collaboration with the local communities.</p> <p>We have partnered with Mara conservation fund and helped build 6 Lionproof Bomas* for communities living around OI Kinyei Conservancy.</p>

<p>6.9. Incentives Incentives are offered to accommodations which engage actively in sustainability (e.g. contract conditions or marketing benefits, such as green logos/indications).</p>	<p>✓</p>	<p>✓</p>	<p>We have a bias when offering accommodations options to clients to always promote first those that engage actively in sustainability. This means more business goes to this properties and we encourage others that are looking to compete to engage actively in sustainability.</p> <p>In our rates sheet for the year 2021, we will be highlighting the decorated facilities as preferred accommodation options.</p>
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Specific conditions

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Action			Details
<p>6.10. Child and compulsory labour The business ensures that, through its accommodation supply chain, the rights of children are respected and safeguarded. If the supplier employs children below the age of 14, the business should ensure that there are special working conditions put in place to safeguard them.</p>	<p>✓</p>	<p>✓</p>	<p>We only work members of local associations and therefore are bound to comply to the law and minimum standards. Child Labor is illegal in Kenya.</p> <p>Further to this, we ask in our sustainable accommodations checklist qn. 3 if the property has child protection policy on child labour and sexual exploitation. This is also in our requirements file where we state;</p> <p>Gamewatchers Safaris does not contract directly or indirectly accommodations which are involved in compulsory labor or which employ children to complete work which is normally undertaken by adults.</p>

<p>6.11. Locally produced souvenirs Accommodations are stimulated to offer locally and/or sustainably produced souvenirs that are based on the area's history and culture.</p>	<p>✓</p>	<p>Our Bias towards small camps doing more for the community and protection of habitat, from previous visits, we know a majority of these have arrangements with the local communities supporting purchase of their beadwork.</p> <p>In Nairobi we carefully select the shops we take guests to buy souvenirs, We only use is the maasai market and utamaduni, mart bronze who sell locally made merchandise.</p> <p>Our supplier requirements/code also states;</p> <p>that we do not expect our suppliers</p> <p>To not promote souvenirs which contain threatened flora and fauna species as indicated in the CITES treaty and the IUCN 'Red List'; historic and archaeological artefacts (except as permitted by law). Not harvest, consume, display, sell, or trade wildlife species, except as part of a regulated activity that ensures that their utilization is sustainable and in compliance with local, national and international law.</p> <p> GWS Suppliers Requirements.docx</p>
<p>6.12. Accommodations respecting and featuring local architecture, settings and cultural heritage. The company prefers accommodations and restaurants that incorporates elements of local art, architecture or cultural heritage; while respecting the intellectual property rights of local communities (taken into account price, comfort and other selection criteria).</p>	<p>✓</p>	<p>Our preference is to work with properties that have left as small footprint as possible during their construction and presence in a certain location. In our Sustainable accomodations checklist that we send to suppliers we ask suppliers to explain their involvement in projects with Locals and how the informatin they give us can be verified.</p> <p>In Our Supplier requirements/code we state</p> <p>We require that our suppliers respect local community resources: In case of clear evidence that contracted accommodations jeopardize the provision or integrity of basic services such as food, water, energy, healthcare or soil to the</p>

		<p>neighboring communities it can be reason to terminate the co-operation with the accommodation.</p> <p> GWS Suppliers Requirements.docx</p>
<p>6.13. Sexual exploitation of children: contracting Accommodation contracts include clauses which enable the tour operator to end the contractual agreement prematurely if the accommodation supplier does not take adequate measures to prevent sexual exploitation of children.</p>	<p>✓ ✓</p>	<p>We include in our sustainable accomodations checklist a requirement for accomodation providers to share with us their child protection policy on child labour and sexual exploitation.</p> <p>In Our Supplier requirements document we require this.</p> <p><i>Gamewatchers Safaris will end the contractual agreement prematurely if the Supplier does not take adequate measures to prevent sexual exploitation of children within the direct supply chain (e.g. accommodations and excursions). Gamewatchers Safaris does not contract directly or indirectly accommodations which are involved in compulsory labor or which employ children to complete work which is normally undertaken by adults.</i></p> <p> Gamewatchers Safaris checklist for sustainable accommodation.docx</p> <p> GWS Suppliers Requirements.docx</p>
<p>6.14. Local communities resources In case of clear evidence that contracted accommodations jeopardize the provision or integrity of basic services such as food, water, energy, healthcare or soil to the neighbouring communities, it can be reason to terminate the cooperation with the accommodation.</p>	<p>✓ ✓</p>	<p>This is mainly addressed through the governments annual audit/assessment (public participation-to get local people’s view) and EK Eco-rating standard.</p> <p>In our summary sustainable policy that is published on our website, we address this by this clause; We only use hotels and camps that adhere by local laws and do not engage in any activity that is harmful to children e.g labor or child sex tourism and the</p>

		community or environment
<p>6.15. Local and fair food Accommodations are stimulated to purchase and use local food products which are produced based on fairtrade and sustainability principles.</p>	✓	<p>By having business bias to Eco-tourism rated facilities where by purchasing and use of local food products which are produced based on fairtrade and sustainability principles is a criteria, we encourage properties to go for the rating which in turn mean they will adhere to best practise and understand the reasons why this is important.</p>
<p>6.16. Biodiversity Contracted accommodations are expected to limit their negative impact on local and global biodiversity, wherever feasible (e.g. not to offer red-listed species on the menu).</p>	✓	<p>✓ In our suppliers code of conduct /requirements we explicitly require that our cintracted suppliers shall</p> <p>"Not harvest, consume, display, sell, or trade wildlife species, except as part of a regulated activity that ensures that their utilization is sustainable and in compliance with local, national and international law."</p> <p> GWS Suppliers Requirements.docx</p>

7. Activities

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Activities

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Action			Details
<p>7.1. Activities offered The company has made an inventory of environmentally or culturally sensitive excursions, which are offered in each destination. This includes excursions offered by the company or by local partners to your clients (partner agency and/or accommodations).</p>	✓	✓	<p>Compliance to KWS and EK safari and Marine code of conducts, KATO code of conduct</p> <p>KATO Code of Conduct</p> <p>We have identified some that we do not do such as slum tourism, un-approved village visits.</p>
<p>7.2. Sustainable excursion policy The company has developed and implemented a policy to improve the sustainability of its excursion base.</p>	✓	✓	<p>Our organisation is designed to work with local communities and organisations that have a clear commitment to environmental conservation and to the responsible use of natural resources. We provide suggestions and guidelines for travellers to minimise the negative impact on the environment and use resources responsibly.</p> <p>We also hire guides from KPSG who are trained and are aware of environmental protection regarding communities, wildlife during excursion.</p>
<p>7.3. Suppliers communication The company is communicating (directly or indirectly) its sustainability objectives and requirements to contracted and other relevant excursion providers.</p>	✓	✓	<p>In our sustainability policy which is clear and visible on our website we have under suppliers policy mentioned this below:</p> <p>We Inform all suppliers of our commitment to Travelife sustainability</p>

			management
<p>7.4. Distribution of codes of conduct/guidelines for sensitive excursions or activities. Providers for sensitive excursions or activities, which are integrated into packages or offered through local partners, receive and implement documented guidelines and/or codes of conduct in order to minimise negative visitor impact and maximize enjoyment. The guidelines are developed with the collaboration and consent of relevant NGO's and the affected community.</p>	✓	—	<p>KWS and EK safari and marine code of conducts.</p> <p>KATO code of conduct.</p> <p>Respect the privacy of the wildlife, this is their habitat. Beware of the animals, they are wild and can be unpredictable. Don't crowd the animals or make sudden noises or movements. Don't feed the animals, it upsets their diet and leads to human dependence. Keep quiet, noise disturbs the wildlife and may antagonize your fellow visitors. Stay in your vehicle at all times, except at designated picnic or walking areas. Keep below the maximum speed limit (40 kph/25 mph). Never drive off-road, this severely damages the habitat. When viewing wildlife keep to a minimum distance of 20 meters and pull to the side of the road so as to allow others to pass. Leave no litter and never leave fires unattended or discard burning objects. Respect the cultural heritage of Kenya, never take pictures of the local people or their habitat without asking their permission, respect the cultural traditions of Kenya and always dress with decorum. Stay over or leave before dusk, visitors must vacate the Park between 6.00 p.m. - 6.00 a.m. unless they are camping overnight. Night game driving is not allowed.</p> <p> PORINI SAFARI CAMPS DRIVERS AND GUIDES CODE OF CONDUCT_Rev.docx</p>
<p>7.5. Baseline / self evaluation Contracted sensitive excursion providers are required to self-evaluate their company on a regular basis and share this information with their</p>	✓	✓	

clients.			
7.6. Certified excursions Where available, preference is given to activities and excursions who operate on the basis of acknowledged and controlled sustainability standards.	-	-	There are no certified excursions in Kenya. There are no certified excursions in Kenya
7.7. Training materials and advice Training manuals and other guidance towards more sustainable management are distributed to excursion providers.	✓	✓	
7.8. Contract conditions Basic sustainability clause(s) are included in activity provider contracts (e.g. child labour, anti-corruption and bribery, waste management and protection of biodiversity).	✓	—	Gamewatchers Safaris is committed to complying with all laws and regulations which govern our operations in Kenya. This Anti-Bribery Policy explains our individual responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.  Gamewatchers Safaris checklist for sustainable accommodation.docx

Specific criteria

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Action			Details
7.9. No excessive negative impact activities The company offers no activities that harm humans, animals, plants, natural resources (e.g. water/energy), or which are socially/culturally unacceptable.	-	-	Excursion types which can be considered unacceptable or "no go" excursions include; Slum excursions

<p>7.10. Wildlife featuring Excursions and attractions in which captive wildlife is held are not offered, except for properly regulated activities in compliance with local, national and international law. In case of living specimens of protected and wildlife species these are only kept by those authorized and suitably equipped to house and care for them humanely.</p>	<p>✓</p>	<p>✓</p>	<p>The laws in Kenya are very strict in terms of captive wildlife and we only take clients to approved facilities.</p> <p>Baiting of wildlife is illegal. (Wildlife Conservation and Management Act 2013)</p>
<p>7.11. Wildlife harvesting Wildlife species are not harvested, consumed, displayed, sold, or traded, except as part of a regulated activity that ensures that their utilisation is sustainable and in compliance with local, national and international law.</p>	<p>✓</p>	<p>✓</p>	<p>Wildlife species harvesting is illegal in Kenya. (Wildlife Conservation and Management Act 2013)</p> <p>Section 50 on Restricted activities involving listed species.</p> <p>A person may not carry an activity involving specimen or a listed species without permission from the service.</p>
<p>7.12. Wildlife interactions Excursions which include interactions with wildlife comply with relevant (e.g. Travelife) codes of conduct. Taking into account cumulative impacts, they do not lead to any adverse effects on the viability and behavior of populations in the wild. Any disturbance of natural ecosystems is minimised, rehabilitated, and there is a compensatory contribution to conservation management.</p>	<p>✓</p>	<p>✓</p>	<p>The Conservancy concept was developed as one of the solutions to stop the increasing losses of wildlife populations in Kenya outside the parks where previously a large proportion of wild animal species were to be found.</p> <p>The conservancies create new areas of protected habitat exclusively for wildlife on additional land adjoining the existing parks and reserves. That removes the pressure to over-develop tourist facilities and makes it possible to keep to the maximum of 1 tourist tent per 700 acres and 1 vehicle per 1400 acres.</p>
<p>7.13. Skilled Guides In sensitive cultural sites (e.g. indigenous villages), heritage sites or ecologically sensitive destinations, guests will be guided by skilled</p>	<p>✓</p>	<p>✓</p>	<p>All of our guides are KPSGA qualified and also we only use qualified guides at destinations.</p>

and/or certified guides.			The KPSGA's aim is to provide an effective, inexpensive and voluntary certification process giving awards of Bronze, Silver and Gold standards through an examination process.
7.14. Supporting local communities The company includes into packages or promotes to clients excursions and activities which directly involve and support local communities (by purchasing services or goods, traditional crafts and local (food) production methods, visiting social projects).	✓	✓	Our conservancy model is one that directly supports local communities with over 1million USD going to the communities in 2015 from our company.
7.15. Supporting environmental and biodiversity protection The company includes into packages or promotes to clients, excursions and activities which support local environment and biodiversity (e.g. visiting protected areas, visiting environmental protection projects).	✓	✓	Our conservancy model in our porini camps - pioneered has been recognised globally an as stated our policy is to promote properties in conservancies.We protect, promote and conserve the environment's flora and fauna. On the other hand we work only with tour operators that work in protecting the environment as well as supporting the communities.

8. Tour leaders, local representatives and guides

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Tour leaders, local representatives and guides

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Action			Details
8.1. Preference local tour leaders/representatives In case of equal qualification, the company prefers to employ local tour leaders, representatives, tour guides, porters, drivers, cooks and other local staff (including management positions), and provides training as required.	✓	✓	Previously, opportunities for jobs were almost non-existent, especially at Selenkay, but the camps and conservancies now employ over 140 members from the communities including managers and junior staff Take-home earnings of individual members are over USD105 per month even for the most junior staff which is significantly higher than average in rural areas.
8.2. Employment conditions The business ensures that tour leaders, representatives, guides and other locally active staff, contracted by the company, understand the terms and conditions of their employment, including remuneration.	✓	✓	The company provides contracts or letters of appointment which clearly state the terms. Attached here i a sample contract on the same.  New Blank Contract --2015.docx
8.3. Living wage Tour leaders, local representatives, guides, porters and other local staff, contracted by the company, are paid at least a living wage that is equal to or above the legal minimum or relevant industry standard.	✓	✓	Minimum wage is set by Kenyan government to be KSh. 11,000 per month (2015). We pay above the minimum wage set by the government.
8.4. Licence	✓	—	Our guides are professional qualified and licenced from Kenya Professional Safari

<p>Tour leaders and local representatives, contracted by the company, are working in accordance with all relevant legal requirements for example, licensing requirements.</p>		<p>Guides (KPSGA)</p>
<p>8.5. Qualification and training Key Tour leaders, local representatives and guides, contracted by the company, are appropriately qualified and are trained regularly.</p>	<p>✓ ✓</p>	<p>We only take guides who are KPSGA qualified and we also pay for and support the Koiyaki guiding school for the masai community members to attend. We have given many full time jobs and take at least four interns every year. We also have a salary scale based on their KPSGA level.</p>
<p>8.6. Sustainability policy Tour leaders, local representatives and guides are informed on the relevant aspects of the companies' sustainability policy and are expected to comply with it.</p>	<p>✓ ✓</p>	<p>We communicate via meetings and company documents. Driver guides and Tour leaders are supplied with a company code of conduct as attached that outlines these.</p> <p> CODE OF CONDUCT DRIVERS AND GUIDES.docx</p> <p> Gamewatchers Sustainability Policy.docx</p> <p> PORINI SAFARI CAMPS DRIVERS AND GUIDES CODE OF CONDUCT_Rev.docx</p>
<p>8.7. Sustainability knowledge Tour leaders and local representatives have been trained on general tourism sustainability principles.</p>	<p>✓ —</p>	<p>This is part of what is required to qualify as a KPSGA guide. All our guides pass through the Kenya Professional Safari Guides Association</p>
<p>8.8. Destination knowledge Tour leaders and local representatives are knowledgeable regarding the destination including relevant sustainability aspects.</p>	<p>✓ —</p>	<p>Kenya Professional Safari Guide in order to sit an exam for the:-</p> <ol style="list-style-type: none"> 1) Bronze category, need not have experience in the field, but should be in the tourism industry or should have proof of some tourism related qualification 2) Silver category, must have three (3) additional years in the field, at Bronze-Level.

			3) Gold category, must have an additional three (3) years in the field, at Silver-Level
8.9. Customer communication Tour leaders, local representatives and guides provide information and interpretation to clients on relevant sustainability matters in the destination (e.g. protection of flora, fauna, and cultural heritage, resource use), social norms and values (e.g. tips, dressing code and photography) and human rights (e.g. sexual exploitation).	✓	✓	Yes, this is a KPSGA qualification requirement. We also reinforce this through our customer service trainings.
8.10. Sexual exploitation of children: staff training Tour leaders and local representatives, contracted by the company, receive relevant information and/or training on the avoidance of sexual exploitation of children.	✓	✓	Yes, this is a KPSGA qualification requirement. (Kenyan Law). More so there are NGOs active in rehabilitation projects and training against sexual exploitation of children in Kenya

9. Destinations

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Selection of destinations

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Action	 	Details
9.1. Destinations files Per destination the company keeps a record of relevant and critical sustainability information (waste, biodiversity, legal requirements, minimum and living wages)	 	We keep records of waste, living wages, legal requirements and biodiversity where we even host research of wildlife in our camps.
9.2. Sustainable destinations Sustainability aspects in destinations are considered in the selection process of new destinations (e.g. traffic-free areas, sustainable city planning, proper waste management infrastructure and community participation). Possibly alternative non-mainstream destinations are offered.	 	There is currently no system in the country to monitor the sustainability of destinations or identify critical issues.
9.3. Unsustainable destinations Destinations in which tourism leads to structural negative local effects in terms of biodiversity, waste; sanitation; human rights and healthcare, water, energy and food availability are not selected (unless the company's involvement results in clear counter balancing effects).	 	Prior to the conservancies around Samburu reserve, due to the overcrowding in the park and resulting in environmental degradation and harassment to animals we had started to actively discourage tours to this area.
9.4. Accessible destinations In selecting new destinations the reachability through more sustainable means of transport is considered.	 	

9.5. International sanctions The company complies with UN and other relevant (EU) sanctions regarding tourism destinations.	✓	✓	
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Local projects and initiatives

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Action			Details
9.6. Compliance with local planning. The activities of the company are in compliance with legally based spatial planning, protected area and heritage regulations and destination management strategies of local, regional and national authorities.	✓	—	Unfortunately Kenya has very poor spatial planning, however we comply with all applicable legal requirements.
9.7. Local economic network The company supports initiatives that improve the relationships between accommodations and local producers, among which the production and distribution of local food products and souvenirs etc. (e.g. initiatives to improve quality level, logistics, transport)	✓	—	We encourage our guest to buy and support the locals by buying some souvenirs from the local community and that way these communities get money to send their children to school. We are delighted to be involved in the “ Lasting Footprints ” jewellery collection, inspired & designed by sustainable Kenyan fashion company Lilabare
9.8. Policy influencing The travel company influences and supports local government (when possible together with other travel companies and stakeholders) concerning sustainability, destination planning and management, use of natural resources and socio-cultural issues. In case of unsustainable management and developments the company discusses this with the relevant authorities (directly or through local partner agencies).	✓	—	The directors are in positions of leadership and influence and continuously push the sustainability agenda. We are member of: KATO Kenya Ecourism kenya East Africa Wildlife Society

<p>9.9. Support biodiversity conservation The business supports biodiversity conservation, including protected areas and areas of high biodiversity, through for example financial contribution, political support, and integration in product offers.</p>	<p>✓</p>	<p>✓ Our conservancy concept is way to help local by making them partners in conservancy projects that expand protected wildlife habitat beyond the borders of the National Parks. For more than 20 years, Gamewatchers safaris limited has been working to expand wildlife habitat and promote the interests of the local community.</p> <p>We are delighted to be involved in the “Lasting Footprints” jewellery collection, inspired & designed by sustainable Kenyan fashion company Lilabare</p>
<p>9.10. Forbidden souvenirs The company and its direct service providers do not promote souvenirs which contain threatened flora and fauna species as indicated in the CITES treaty and the IUCN ‘Red List’; historic and archaeological artefacts (except as permitted by law).</p>	<p>✓</p>	<p>✓ KWS Safari and Marine code of conducts</p> <p>EK Safari and Marine code of conducts</p> <p>Illegal souvenirs:</p> <ul style="list-style-type: none"> • No disturbing the ecological balance-do not purchase, collect, or remove any animal products (e.g. ivory, animal skins, trophies), restricted artifacts, rocks, plants, seeds, or birds’ nests from the wild or alter the natural environment in any way. • Do not touch or stand on coral reefs and never dispose of litter on the beach or in the sea • Never buy or remove animals or shells from the sea-avoid buying starfish, shells or any product that derive from turtles, whales, marine trophies or other endangered species. • Avoid buying undersized crabs and lobsters-which contribute to their rapid decrease in population. <p>we adhere to the KWS code.</p> <p>No disturbing the ecological balance-do not purchase, collect, or remove any animal products, rocks, plants, seeds, or birds’ nests from the wild or alter the natural environment in any way. Do not touch or stand on coral reefs and never dispose of litter on the beach or in the sea Never buy or remove animals or shells from the sea-avoid buying starfish, shells or any product that derive from</p>

			<p>turtles, whales or other endangered species. Avoid buying undersized crabs and lobsters-which contribute to their rapid decrease in population.</p>
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10. Customer communication and protection

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Prior to booking

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Action			Details
10.1. Consultation guidelines A company guideline for client consultation is available and is followed by client advisors.			This is part of the induction process.
10.2. CRM A Customer Relationship Management system is available (CRM)			Before and after the travel our Managing director always sends emails personally to our clients. We at Gamewatchers have an arrive and exit survey for our clients whereby 60% of our bookings are done by us. We also monitor social media reviews and give our clients review cards from our managing director where our comeback clients are welcomed as family .
10.3. Customer privacy The company ensures that customer privacy is not compromised.			If a customer does not have a confirmed booking with us we will do not share your personal information with any other company. When a customers booking has been confirmed, we will only disclose his/her personal details to our suppliers if required for operational reasons. We will not pass on his/her details to other companies for marketing purposes. We will hold the details of your insurance provider, passport and next of kin. In case of emergency we may share these details with the Emergency Services or his/her Consulate or Embassy

<p>10.4. Promotion and communication Promotion materials and marketing communication comply with relevant standards and voluntary codes of conduct, are transparent and accurate and do not promise more than is being delivered.</p>	<p>✓</p>	<p>✓</p>	<p>Each Campaign that is ran from the Marketing team goes through two approval level, first via the marketing manager, then via the commercial director, the marketing team is advised with correct standard to be applied like</p> <p>We only use images/videos that we have been allowed to thus do not infridge on anyones copywright We are careful with the wording not to over sell, as such we keep the expectations level standard. Our email messages go only to people that have voluntarily shared their contacts with us. they still have the option to unsubscribe thus stop recieving our advertising messages.</p>
<p>10.5. Product information Product and price information is clear, complete and accurate with regard to the company and its products and services, including sustainability claims.</p>	<p>✓</p>	<p>✓</p>	<p>We have a well defined product and pricing policy. Our Prices for direct sales are posted on our website, we offer clients nets that are commisionable at various level. the openness with our top prices means the agents know how far they can markup thus ensuring the pricing is just right. In the rates that we sent out we always explain the inclusions and the periods that the prices change. We also explain our product and sustainable practises that justify a slightly higher price.</p>
<p>10.6. Destination information, quality Destination information, including sustainability aspects, is factually correct, balanced and complete.</p>	<p>✓</p>	<p>✓</p>	<p>Yes. we periodically update this information on our website and share via social media.</p> <p>whenever we recieve new information the product and marketing teams put together the revant details and send on to the managing director for approval and onward uploading onto the website.</p>
<p>10.7. Group number In case of group travel, the minimum and maximum number of participants is communicated.</p>	<p>✓</p>	<p>—</p>	<p>Visitors who stay in our small camps within the conservancies have a very special safari experience as they can see all the wildlife in a pristine wilderness but without masses of other tourists present.</p> <p>We have established a formula of no more than one tent per 700 acres and no more</p>

			<p>than twelve guest tents per camp in the conservancies which we have been involved in establishing: Selenkay Conservancy in the Amboseli eco-system and Ol Kinyei, Olare Motorogi and Naboisho conservancies in the Mara. This ensures a low-density form of tourism which has less impact on the environment and which provides a more intimate and rewarding experience for the visitor.</p> <p>That removes the pressure to over-develop tourist facilities and makes it possible to keep to the maximum of 1 tourist tent per 700 acres and 1 vehicle per 1400 acres.</p>
<p>10.8. GHG / Carbon emission level Clients are informed about the GHG or carbon emission of the travel offer before booking in order to enable consumers to take this into account in their decision making process.</p>	✓	—	
<p>10.9. Sustainable transport Clients are informed about the environmental impact of different transport options to reach the destination (in case these are not included in the package). Sustainable alternatives, where available, are offered.</p>	✓	✓	<p>There is no sustainable alternative for transfer to and from the airport. Only taxis and/or bus transportation is available.</p>
<p>10.10. Transport to the airport Clients are informed about and stimulated to choose sustainable transport options to the place of embarkation (e.g. special arrangements in co-operation with public transport companies such</p>	✓	—	<p>Yes, we have ifact a policy of using chartered aircraft to one of our camps during the busier months, this allows us to minimise driving time from the airstrip and allows us to group a bigger number of clients into one aircraft when going to the same location. this happens with our porini Amboseli camp where we are in partnership with yellowings.</p>

<p>as Rail and Fly). Alternatives are provided for short distance connection flights.</p>			
<p>10.11. GHG / Carbon offset information Clients are informed about the possibilities for Green House Gas or carbon reduction/compensation for the international transport of their journey.</p>	✓	✓	
<p>10.12. GHG / Carbon compensation with booking GHG / Carbon off-set of air transport is integrated as voluntary option in the booking form. Payment is channelled through the travel company.</p>	✓	—	<p>We choose to work partners with criteria agenda to off set carbon emission e.g Safarilink</p> <p>Safarilink CSR activities are focused on preserving nature and improving lives of communities in destinations that we serve. From Lamu to Masai Mara and Laikipia area, we support wildlife conservation, forest restoration, health, and education projects. In addition, we are engaged in numerous acts of goodwill across the country to save nature and transform lives.</p>
<p>10.13. Indication sustainable accommodation and excursions (Certified) sustainable accommodations, excursions, packages and/or transport options are promoted with logos or other messages. They are recognisable to consumer and presented as the “better” option.</p>	✓	✓	<p>Yes. We frequently with highlight the ecorating category of various properties that we use, we also always highlight in our marketing materials the better sustianable products.</p>
<p>10.14. Travel advise sustainable offers In the frame of personal travel advise, the customer is informed about sustainable alternatives concerning accommodations, excursions, package holidays and transport options, if available.</p>	✓	✓	<p>Though depedant on the budget the customer is always advised about our sustainable options. we offer this in the about us message that we send to clients.</p>
<p>10.15. Sustainability commitment (Potential) direct customers are clearly informed about the related sustainability commitments and actions.</p>	✓	✓	<p>Sustainability is very much at the core of our busines model and communicated through our messaging including on our website and our youtube channel.</p> <p>We educate our direct customers though our socila media, our news articles and also</p>

our beautiful written blogs.

After booking and during holidays

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Action			Details
10.16. Destination information and interpretation Information is provided to consumers about the natural surroundings, local culture and cultural heritage in the holiday destination.	✓	✓	From the email correspondences and listing of our products on our comprehensive website we highlight and offer information about the culture and natural surrounding of the destination and what the customer should expect.
10.17. Destination Do's and Don'ts Customers are informed about key sustainability aspects and issues in the destination and receive recommendations on how to make a positive contribution (e.g. limitation of resource use, waste, illegal souvenirs, cultural habits, dress code, initiatives to be supported).	✓	✓	We inform our customers via our website of the projects we are undertaking and as well request for donations where necessary to complete these. Here is the link on our website that we use; https://www.porini.com/about-us/supporting-communities/
10.18. Health and Safety Customers are informed regarding risks and precautions related to health and safety matters in the destination.	✓	✓	This is on our website, we are members of the KTF safety centre and our drivers and guides and customer service reps also brief all clients.
10.19. Destination contact person A contact person and permanently reachable telephone number is available for emergency situations.	✓	✓	At the bottom of our emails - in the signature we communicate our after hours numbers. we also always communicate public holidays in advance and the numbers to reach us on in case of an emergency. This is also given in all the material we offer clients with the welcome pack.

<p>10.20. Emergency situations Guidelines are available and relevant personnel are educated on how to deal with emergency situations.</p>	✓	✓	<p>We have a customer service manager that is the first level of escalation in case of an emergency situation that the staff on ground cannot resolve, should this not bear fruit the commercial director is involved. We have also taken insurance for emergency evacuations. The managers are reachable 24 hours. We also have access to SATIB emergency advice system.</p>
<p>10.21. Activities do's and don'ts Clients receive documented guidelines and/or codes of conduct for sensitive excursions and activities in order to minimise adverse visitor impact and maximise visitor fulfilment. The guidelines are based upon international and national good practice and locally agreed.</p>	✓	—	<p>We have currently not offering any sensitive excursions. We however do advise the customers on the do and don'ts when visiting the local homes of the communities. This they are advised by the local tour guide, usually from the community they are about to visit who takes them on the tour.</p> <p>Similarly for clients on safari and at our camps that are unfenced we advise guests on how to behave whilst on every excursion, from game drives to walks.</p>
<p>10.22. Sexual exploitation Customers are informed about commercial, sexual or any other form of exploitation and harassment, particularly of children and adolescents.</p>	✓	✓	<p>Section 3 of our partner contracts mentions that suppliers should take measures against sexual exploitation of children.</p>
<p>10.23. Illegal souvenirs Clients are informed about applicable legislation concerning the purchasing, sales, in- and export of historic or religious artefacts and articles containing materials of threatened flora and/or fauna in the destination (e.g. CITES).</p>	✓	✓	<p>Clients should be advised not to be involved or purchase illegal souvenirs such as ivory, animal skin or animal parts</p> <p>KWS Safari and Marine code of conducts</p> <p>EK Safari and Marine code of conducts</p>

			<p>Illegal souvenirs:</p> <ul style="list-style-type: none"> • No disturbing the ecological balance-do not purchase, collect, or remove any animal products (e.g. ivory, animal skins, trophies), restricted artifacts, rocks, plants, seeds, or birds' nests from the wild or alter the natural environment in any way. • Do not touch or stand on coral reefs and never dispose of litter on the beach or in the sea • Never buy or remove animals or shells from the sea-avoid buying starfish, shells or any product that derive from turtles, whales, marine trophies or other endangered species. • Avoid buying undersized crabs and lobsters-which contribute to their rapid decrease in population. <p>in the tours we build we have very specific places we take the clients to purchase souvenirs. we have deliberately come up with the shops that abide by the local legislation in our destinations. We check on these places to ensure they do not trade in illegal or threatened species.</p>
<p>10.24. Local services and goods Clients are motivated to use local restaurants and shops (where appropriate).</p>	✓	✓	<p>Where available we send them halfboard rates, like at the beach giving them time and opportunity to interact with the local people as the source for the extra meal.</p>
<p>10.25. Sustainable transport options Where feasible clients are informed on sustainable transport options in destinations. For example by providing information on public transport.</p>	✓	✓	<p>Unfortunately public road and rail transport is not very well developed in Kenya and can be unreliable in regards to time. We however still advice clients of available alternatives where applicable whilst encouraging them to go with the best option both in terms of time and safety.</p>
<p>10.26. Donations</p>	✓	—	<p>Yes. we offer donation cards and booklets to clients with specific initiatives that they can</p>

<p>Clients are encouraged to donate (e.g. through travel company supported charities) to local charity and sustainable initiatives (e.g. nature conservation, cultural and social projects).</p>			<p>support. In the last 18 months we have recieved over \$25000 for these projects from our clients.</p>
<p>10.27. Guarantee fund The company participates in a client guarantee or insurance fund (refunding of travel costs in case of bankruptcy)</p>	<p>✓</p>	<p>—</p>	<p>Gamewatchers Safaris is a member of the Kenya Association of Tour Operators bonding scheme, backed by a leading insurance company, to ensure guests payments are fully protected if a bonded KATO member ceases trading.</p>

After holidays

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Action			Details
<p>10.28. Customer satisfaction Customer satisfaction is systematically monitored and corrective actions are taken for service and product improvements.</p>	<p>✓</p>	<p>✓</p>	<p>3 days after departure, the managing director follows up each client with a 'welcome home message' enquiring how their trip went.</p> <p>This message coming from the highest office means clients genuinely reply and the issues are tackled by the top decision maker at the company.</p> <p>Clients that return with us recieve gifts from the company to show our appreciation for their endorsement. We also encourage clients to review our services on tripadvisor. Our Directors monitor Trip advisor and online forums daily to monitor feedback and use it to improve.</p>
<p>10.29. Sustainability and customer satisfaction Sustainability is an integral part of the research into customer satisfaction.</p>	<p>✓</p>	<p>✓</p>	<p>Here below are the questions on our feedback form.</p>

			Which member of our team at Gamewatchers Safaris handled your booking?
10.30. Complaints The company has clear procedures in case of complaints from clients.	✓	✓	Any complains are reported to the customer service manager and if she is not able to address it completely it is escalated to the directors. All complaints are also documented on the day and in a monthly report. All complaints are handled with the objective of there being a satisfactory outcome for the clients and there is a culture that complaints should be seen as an opportunity to improve and win over the client.