THE ALPINA GSTAAD

Communication Policy

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Applies to: The Alpina Gstaad
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Approved by: GM

1. PURPOSE

This Communication Policy establishes the mandatory governance framework through which The Alpina Gstaad manages, controls, approves, and verifies internal and external communication that may influence operational performance, stakeholder understanding, sustainability credibility, legal compliance, or the reputation of the hotel.

Communication within The Alpina Gstaad shall be accurate, proportionate, consistent, and supported by evidence where factual or performance-related statements are made. Sustainability communication shall reflect what the hotel can demonstrate in practice and shall not exceed the scope, quality, or reliability of the available evidence.

The purpose of this policy is to:

- Establish consistent and enforceable communication requirements across the property
- Ensure that internal communication supports clear operational responsibilities and expected behaviour
- Ensure that external communication accurately reflects actual hotel performance and approved commitments
- Prevent vague, misleading, exaggerated, or unsupported environmental and sustainability claims
- Define responsibilities for the preparation, review, approval, publication, and retention of communication
- Ensure that statements used in marketing, websites, guest information, public reporting, and stakeholder engagement are evidence-based
- Protect the credibility of The Alpina Gstaad, its sustainability programme, and its certification-related communication

Communication is therefore a controlled management activity and shall not be treated solely as a marketing function. The General Manager is accountable for ensuring that communication controls are implemented and effective at property level.

2. SCOPE

This policy applies to The Alpina Gstaad operating in Switzerland and extends to all departments, employees, managers, contractors, consultants, agencies, suppliers, and other persons who prepare, approve, publish, distribute, or rely upon communication on behalf of the hotel.

It applies, as relevant, to:

- Internal staff communication and operational instructions
- Management communication and departmental briefings
- Hotel website content and digital channels
- Marketing, advertising, campaigns, brochures, and promotional material
- Guest-facing information, signage, menus, in-room information, and sustainability messaging
- Press releases, media statements, interviews, and public presentations
- Supplier, partner, and stakeholder communication
- Sustainability reports, statements, policies, targets, performance data, and claims
- Certification, recognition, label, award, or membership references
- Environmental, social, local, responsible, ethical, climate-related, circular, recycled, renewable, organic, or similar claims

3. MANDATORY APPLICATION

The property shall implement all requirements defined in this policy and translate them into appropriate Operational Manuals (OMs), approval procedures, evidence controls, communication responsibilities, and record-retention requirements.

A communication requirement shall be considered effectively implemented only where it is:

- Documented within an applicable procedure, approval route, or communication control
- Applied consistently in operational practice
- Supported by current and relevant evidence where factual claims are made
- Approved by the appropriate responsible person before publication where required
- Monitored and verified through management review or internal audit

No department or individual may publish or circulate material sustainability information on behalf of the hotel where the content cannot be substantiated or where the approval required by this policy has not been obtained. Operational convenience, marketing urgency, commercial pressure, or creative preference shall not override this requirement.

4. GOVERNANCE PRINCIPLES

Communication shall operate under a controlled governance model connecting source information, evidence, drafting, review, approval, publication, monitoring, and correction.

Communication decisions shall be based on the following principles:

- Accuracy of factual statements
- Clarity of scope and meaning
- Consistency with actual operational performance
- Availability of evidence proportionate to the claim being made
- Clear distinction between achieved performance, future commitments, aspirations, and third-party recognition
- Avoidance of language capable of creating a materially misleading overall impression
- Respect for applicable legal, regulatory, contractual, and certification requirements
- Traceability of material sustainability claims and their supporting evidence

Where communication involves a material sustainability claim, performance result, certification reference, environmental benefit, or public target, the claim shall be reviewed in its complete context. A technically correct statement shall not be used where the overall presentation, imagery, omission, or wording could reasonably create a misleading interpretation.

5. ROLES AND ACCOUNTABILITY

Management is responsible for defining communication expectations, establishing oversight, and ensuring that communication controls are implemented consistently across the property.

The General Manager is accountable for:

- Implementation of this policy
- Approval or delegated approval of material public sustainability communication
- Resolution of significant communication, legal, or reputational risks
- Ensuring that corrective actions arising from review or audit are closed

The Marketing and Communication function is responsible for coordinating external communication, ensuring that approved content is used consistently, and maintaining control over website, marketing, campaign, media, and guest-facing material within its remit.

The Sustainability Officer or designated sustainability responsible person is responsible for verifying sustainability-related content against available evidence, approved policies, performance data, certification status, and other applicable sustainability requirements before material claims are released.

Department heads are responsible for ensuring that information originating from their operational areas is accurate, current, and complete before it is provided for internal or external communication.

The Financial Controller is responsible for the integrity of financial or performance data within their remit and shall support verification where cost, investment, consumption, savings, or other quantitative statements are communicated.

The Chief Engineer is responsible for the technical accuracy of statements concerning energy, water, building systems, renewable energy, efficiency measures, technical performance, and related operational data.

Diffuse responsibility without clear ownership shall be corrected. Material communication shall have an identifiable content owner, reviewer, approver, and evidence source appropriate to its risk and intended audience.

6. COMMUNICATION CONTROL REQUIREMENTS

The property shall maintain documented communication controls proportionate to the subject, audience, reach, permanence, and potential legal or reputational impact of the communication.

As a minimum, communication controls shall address:

- Identification of the responsible content owner
- Verification of factual and performance-related information
- Evidence requirements for sustainability-related claims
- Approval authority before publication
- Version control for policies, statements, and material public content
- Periodic review of published information
- Correction or withdrawal of inaccurate, outdated, or unsupported content
- Retention of evidence sufficient to demonstrate the basis of material claims

Communication shall be reviewed when there is a significant operational change, change in certification status, new performance data, relevant legal change, change in supplier evidence, or any other development capable of making existing public information inaccurate or misleading.

7. INTERNAL COMMUNICATION

Internal communication shall ensure that employees understand the sustainability requirements relevant to their roles and the operational behaviours expected from them.

Internal communication shall be clear, practical, and linked to actual hotel procedures. It shall, where relevant:

- Communicate responsibilities and operational expectations
- Explain changes to procedures, targets, or controls
- Support consistent implementation across departments
- Provide staff with accurate information for responding to guest questions
- Communicate relevant audit findings, corrective actions, and improvement priorities
- Avoid statements that could cause staff to repeat unsupported claims externally

Internal sustainability communication shall not be limited to awareness campaigns. It shall support operational implementation, accountability, and evidence-based understanding of what the hotel is doing, what remains to be improved, and what employees are expected to contribute within their roles.

8. EXTERNAL AND PUBLIC COMMUNICATION

External communication shall reflect actual hotel performance and shall not present an aspiration, pilot project, isolated action, future target, or limited initiative as though it represents complete hotel performance.

Public communication, including marketing materials, website content, social media, guest-facing information, media statements, and public presentations, shall:

- Use factual language that can be demonstrated
- Define the scope of a claim where scope is necessary to avoid misunderstanding
- Differentiate clearly between hotel actions and third-party actions
- Differentiate clearly between certification, recognition, membership, participation, and internal programmes
- Use current certification or recognition status only while valid and within permitted terms
- Avoid absolute or broad environmental claims unless the full meaning of the claim can be substantiated
- Avoid selective disclosure that creates an overall impression materially stronger than the underlying performance

Images, icons, colours, labels, seals, headlines, and other visual elements shall be considered part of the overall communication. They shall not be used in a manner that implies a verified environmental or sustainability benefit that the accompanying evidence does not support.

9. SUSTAINABILITY CLAIMS, EVIDENCE AND APPROVAL

All material sustainability claims shall be evidence-based, specific enough to be understood, and capable of verification. The strength of the evidence shall be proportionate to the significance and breadth of the claim.

Before a material sustainability claim is approved, the property shall verify, as relevant:

- What exactly is being claimed
- Which product, service, activity, department, period, or operational boundary the claim covers
- Which evidence supports the claim
- Whether the evidence is current, reliable, and directly relevant
- Whether exclusions, limitations, conditions, or assumptions need to be stated
- Whether third-party certification or recognition is described accurately
- Whether the overall wording could reasonably lead a guest or stakeholder to a broader conclusion than the evidence supports

Terms such as sustainable, green, environmentally friendly, eco-friendly, climate friendly, responsible, carbon neutral, net zero, zero waste, circular, local, ethical, natural, and similar expressions shall not be used as generic promotional language without an appropriate factual basis and defined scope.

Where a claim depends on supplier information, certification, product attributes, renewable energy evidence, recycling arrangements, offsets, social initiatives, donations, or other third-party information, the supporting documentation shall be available before the claim is relied upon.

Where communication is directed to consumers in another jurisdiction, the hotel shall consider the consumer-protection and environmental-claims requirements applicable in that target market in addition to Swiss requirements. Material uncertainty regarding legal interpretation shall be escalated before publication.

10. STAKEHOLDER, PARTNER AND SUPPLIER COMMUNICATION

The Alpina Gstaad shall communicate with suppliers, partners, certification bodies, community organisations, and other relevant stakeholders in a manner that supports transparency, cooperation, and evidence-based improvement.

Stakeholder communication may be used to:

- Explain hotel sustainability expectations and relevant purchasing or operational requirements
- Request information or evidence required for certification, reporting, benchmarking, or public communication
- Share relevant hotel policies, objectives, and improvement priorities
- Encourage suppliers and partners to improve environmental and social performance
- Collect feedback and identify opportunities for joint action
- Demonstrate the contribution of stakeholders to credible hotel sustainability performance without overstating their role or impact

Third-party logos, names, certifications, partnerships, memberships, or endorsements shall be used only where authorised and accurately described. Cooperation with an external organisation shall not be presented as certification or independent verification unless that is factually the case.

11. DIGITAL, MARKETING AND GUEST-FACING CONTENT

Digital and guest-facing communication shall be subject to the same evidence and approval requirements as formal policies or reports. The speed or informality of a communication channel shall not reduce the level of control required for material claims.

The property shall ensure that:

- Website sustainability content is reviewed periodically and after material changes
- Social-media content does not introduce unapproved or unsupported sustainability claims
- Guest-facing signs and messages accurately describe the operational action requested or benefit claimed
- Menus and product descriptions using local, organic, certified, responsible, or similar attributes are supported by appropriate evidence

- Recognition and certification logos are displayed only in accordance with current status and applicable usage rules
- Obsolete, superseded, or inaccurate sustainability information is removed or corrected without unreasonable delay

Guest engagement should be positive and informative, but shall not transfer responsibility for hotel environmental performance to the guest. Communication requesting guest participation shall explain the action clearly and shall remain consistent with the operational systems implemented by the hotel.

12. MONITORING, INTERNAL AUDIT AND CORRECTIVE ACTION

Communication controls shall form part of the hotel internal sustainability audit programme and shall be verified through evidence-based assessment.

Monitoring and internal audit shall verify, as relevant:

- Accuracy and currency of public sustainability information
- Availability of evidence supporting material claims
- Consistency between communication and actual operational practice
- Correct use of certification, recognition, label, and partnership references
- Application of approval and version-control requirements
- Removal or correction of outdated or unsupported content
- Implementation of corrective actions arising from complaints, reviews, audits, or management findings

Where inaccurate, misleading, unsupported, or outdated communication is identified, the responsible manager shall assess the significance of the issue and ensure that the content is corrected, qualified, withdrawn, or otherwise controlled within an appropriate timeframe.

Material communication failures capable of creating legal, certification, or reputational risk shall be escalated immediately to the General Manager. Corrective action shall address both the published content and the control failure that allowed the issue to occur.

13. TRAINING AND MANAGEMENT REVIEW

Effective implementation of this policy depends on competent personnel and clear understanding of communication responsibilities.

The property shall ensure that relevant personnel understand:

- Their authority to prepare, approve, or publish communication
- The requirement to distinguish fact, target, aspiration, recognition, and certification
- The evidence required for material sustainability claims
- The importance of scope, wording, context, and overall consumer interpretation
- The requirement to escalate uncertainty before publication
- The records required to demonstrate compliance with this policy

Training shall be appropriate to role. Marketing, sustainability, purchasing, engineering, food and beverage, human resources, and other departments responsible for material communication shall receive sufficient guidance to apply this policy consistently.

Communication performance shall be included within management review at appropriate intervals. Management review shall consider relevant audit findings, public claims, complaints, stakeholder feedback, changes in certification or recognition status, legal developments, evidence gaps, corrective actions, and opportunities to improve clarity and credibility.

The purpose of management review is to ensure that:

- Communication controls remain effective
- Published information remains accurate and current
- Material sustainability claims remain supported by evidence
- Responsibilities and approval routes remain clear
- Legal, certification, and reputational risks are controlled
- Continuous improvement in transparency and stakeholder understanding is achieved

The General Manager is accountable for ensuring that communication governance remains effective. Relevant department heads are responsible for providing evidence and performance information required for review.

14. FINAL POSITION

This policy is mandatory and forms part of The Alpina Gstaad governance framework.

Communication shall support transparency, operational understanding, guest confidence, stakeholder engagement, and the credible presentation of hotel sustainability performance.

There is no discretionary interpretation of mandatory requirements established by this policy. Where uncertainty exists regarding a material statement or claim, publication shall be delayed until the relevant evidence, scope, wording, and approval have been confirmed.

Nadine Friedli General Manager
The Alpina Gstaad | Date: 08 April 2026