

This Sustainability Risk Assessment identifies and evaluates environmental, social and cultural risks associated with the organisation’s operations and has been assessed against the 10 EarthCheck Key Performance Areas.

Methodology: Risks have been evaluated based on likelihood, severity and reversibility of impact, stakeholder views, and emergency and accidental situations\*.

Review Cycle: This Risk Assessment is reviewed annually.

Version Control: Version 6 | Date: 3<sup>rd</sup> February 2026 | Reviewed by: Magaly Etter

Linked Documents: Sustainability & Energy Efficiency Policy; Sustainability Action Plan; Emergency Planning & Response Procedures.

\*Projections are based on data from the [UK climate projections 2009 \(UKCP09\)](#) and updated to take full account of the [UK climate projections 2018 \(UKCP18\)](#).

		Consequences				
		1 - Insignificant (Minor problem easily handled by normal day to day process)	2 - Minor (Some disruption possible)	3 - Moderate (Significant time/resources required)	4 - Major (Operations severely damaged)	5 - Catastrophic (Business survival is at risk)
Likelihood	Almost certain (>90% chance)	High (H)	High (H)	Extreme (X)	Extreme (X)	Extreme (X)
	Likely (50%-90%)	Moderate (M)	High (H)	High (H)	Extreme (X)	Extreme (X)
	Moderate (10%-50% chance)	Low (L)	Moderate (M)	High (H)	Extreme (X)	Extreme (X)
	Unlikely (3%-10% chance)	Low (L)	Low (L)	Moderate (M)	High (H)	Extreme (X)
	Rare (<3% chance)	Low (L)	Low (L)	Moderate (M)	High (H)	High (H)

**RISK ASSESSMENT FORM**

1. & 2. Greenhouse Gas Emissions & Energy Efficiency, Conservation and Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Commute to work and business travel  <i>2024 EC report area of improvement</i>	Increased GHG emissions which increase the impacts of climate change	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>• Team members are encouraged to car share. (walking or cycling not advised due to property location)</li> <li>• Business travel will be kept to a minimum and will be attended virtually whenever possible.</li> <li>• Chef's international journeys are being offset.</li> <li>• Staff accommodation on property housing up to 20 team members walking to work.</li> <li>• Staff reduced rate offer to charge EV on site.</li> </ul>	Almost certain	Minor	High
Supply chain delivery journey	Increased GHG emissions which increase the impacts of climate change	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>• Collaboration with Greenly (Carbon Accounting Platform) to improve accuracy of Scope 3 calculation.</li> <li>• Goods are purchased locally where possible and if not, miles travelled kept to a minimum.</li> <li>• Team encouraged to merge orders and purchase larger quantities less often.</li> <li>• Suppliers encouraged to kick start their sustainability journey, calculate their emissions, and set targets.</li> <li>• EV charging points for suppliers.</li> <li>• Annual suppliers' workshop to enhance collaboration on carbon reduction</li> </ul>	Almost certain	Minor	High

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<p>Guests journey to and from hotel</p>	<p>Increased GHG emissions which increase the impacts of climate change</p>	<p>Almost certain</p>	<p>Moderate</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Guests encouraged to choose environmentally friendly travel options where possible.</li> <li>• EV charging points available in car park.</li> <li>• Guests encouraged to offset their journey.</li> <li>• Calculating &amp; recording guests' journey to us.</li> <li>• Prioritising eco-responsible taxi drivers and chauffeurs with electric vehicles.</li> </ul>	<p>Almost certain</p>	<p>Minor</p>	<p>High</p>
<p>Production of waste, disposal and treatment</p>	<p>Incorrect processing of waste can end up in landfill and create large amount of emissions</p>	<p>Likely</p>	<p>Minor</p>	<p>High</p>	<ul style="list-style-type: none"> <li>• Minimise waste at the source</li> <li>• Educate around waste segregation and reducing waste.</li> <li>• Working with a waste company that sends zero-waste to landfill:                             <ul style="list-style-type: none"> <li>○ General Waste burnt to generate electricity.</li> <li>○ Food waste used to make biogas and fertiliser.</li> <li>○ Dry mixed recycling enters circular economy to be reused.</li> </ul> </li> </ul>	<p>Rare</p>	<p>Insignificant</p>	<p>Low</p>
<p>Electrical appliances</p> <p>Microwaves Coffee machine Kitchen processor Oven TV Vacuum ...</p> <p><i>2024 EC report area of improvement</i></p>	<p>Increased energy consumption thereby increasing GHG emissions</p>	<p>Almost certain</p>	<p>Minor</p>	<p>High</p>	<ul style="list-style-type: none"> <li>• Renewable energy purchased since 2019</li> <li>• Purchasing energy efficient appliances and promoting energy efficient practices.</li> <li>• Staff encouraged to turn off monitors, computers and plugs when not in use.</li> <li>• Turn-off lights policy in place for meeting rooms and for individual offices when not in use.</li> <li>• Guests encouraged to turn off lights on master switch when leaving their room.</li> <li>• Back of house, toilets, laundry room and maintenance lights are on a sensor ensuring they go off when nobody is around.</li> <li>• Night team performing security check and powering down electrical items as they cover the whole building.</li> </ul>	<p>Moderate</p>	<p>Minor</p>	<p>Moderate</p>

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<p>Use of fossil fuels</p>	<p>Increased energy consumption thereby increasing GHG emissions</p>	<p>Almost certain</p>	<p>Major</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Extensive study completed in 2025 to produce our own energy. Still at project stage</li> <li>• We joined a consortia with SE First, buying 100% renewable energy (no purchase of REGO on top)</li> <li>• No more coal in open fires since 2021</li> <li>• Biogas since October 2022</li> <li>• Changing to electric garden equipment at end of life to eliminate any fossil fuel from property</li> </ul>	<p>Rare</p>	<p>Moderate</p>	<p>Moderate</p>
<p>Lighting <i>2024 EC report area of improvement</i></p>	<p>Increased energy consumption generating greenhouse gas emissions</p>	<p>Almost certain</p>	<p>Minor</p>	<p>High</p>	<ul style="list-style-type: none"> <li>• Most back of house lighting on timer</li> <li>• Light bulbs changed to LED lights.</li> <li>• Staff are encouraged to switch off any lights that are not on timers when leaving the room.</li> <li>• Guests are asked to switch off the lights when leaving their rooms.</li> <li>• Minimise public area lighting during night.</li> <li>• Outdoor lights off between midnight and 6am.</li> </ul>	<p>Moderate</p>	<p>Minor</p>	<p>Moderate</p>

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3. Management of Freshwater Resources								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Sustainable source of freshwater	<p>Moving and treating water is an energy intensive process leading to millions of tonnes of greenhouse gas emissions each year.</p> <p>Only 2.5% of all water in the world is fresh water, and less than 1% of this is accessible (freshwaterwatch.org)</p>	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>• Water provenance checked on supplier website</li> <li>• Borehole on the grounds being used in the gardens</li> </ul>	Likely	Minor	High
Excessive potable water consumption  <i>2024 EC report area of improvement</i>	Resource depletion, high costs	Likely	Moderate	High	<ul style="list-style-type: none"> <li>• Water efficient equipment installed</li> <li>• Water saving fixtures installed in guest rooms, public toilets and kitchens, e.g., dual flush toilets.</li> <li>• Increased staff awareness and training on water conservation and water health</li> <li>• Maintenance to monitor and record leaks. – Smartflow system in place that will detect and inform of excessive usage.</li> <li>• Water butt collecting rain from greenhouses to be reuse in gardens</li> <li>• 80'000 litres borehole tank installed in the garden</li> </ul>	Moderate	Minor	Moderate
Water discharge integrity	Excessive use of water, litter, waste, food waste or chemicals being washed down the stormwater drains or the sewage system and climate change will impact on waterway health, in turn can cause damages to the integrity	Almost certain	Major	Extreme	<ul style="list-style-type: none"> <li>• Regular cleaning of the gutters.</li> <li>• Sink and drain catchers are used to ensure larger items do not enter the drain system</li> <li>• Bio-based and natural cleaning products are purchased to reduce negative impact.</li> <li>• Regular check and tests of our sewage plant</li> <li>• Staff training on correct disposal of products</li> </ul>	Unlikely	Moderate	Moderate

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	of our water discharge in the river. Treated water of our sewage treatment plant is discarded in the river, a problem in treatment could cause damages							
Water contamination	Health hazard, regulatory	Likely	Major	Extreme	<ul style="list-style-type: none"> <li>• Legionella prevention plan</li> <li>• Regular maintenance</li> <li>• Regular water quality test</li> <li>• Flush of system when not in use for a longer period of time</li> </ul>	Rare	Moderate	Moderate

4. Ecosystem, Conservation and Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Green space	Whatley Manor is surrounded with 12 acres of land with a large variety of fauna and flora. Maintaining and growing the garden can result in a loss of insects, birds and animals as well as a loss of trees	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>• No pesticides used on property since 2021</li> <li>• Create animal friendly habitats e.g., bird houses, beehives, critter hotels, areas of meadow/wildflowers, hedgehog houses etc.</li> <li>• Provide and maintain water sources.</li> <li>• Educate and train staff in in the importance of healthy ecosystems.</li> <li>• Encourage staff to participate in clean-up projects.</li> <li>• Plant more trees</li> <li>• Maintain trees in good health</li> <li>• Avoid cutting down trees and adopt a tree replacement policy where this is not possible</li> <li>• Replace plants to attract pollinators</li> <li>• Leave some area untouched to encourage wildlife</li> </ul>	Unlikely	Moderate	Moderate

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Ecosystem disturbance	Guest activities can impact the local ecosystems.	Likely	Moderate	High	<ul style="list-style-type: none"> <li>•Garden team monitoring wildlife across property.</li> <li>•Part of the garden left wild to encourage wildlife.</li> <li>•Guests and staff encouraged to stay at a safe distance if they spot any wildlife.</li> <li>•Biodiversity audit completed.</li> </ul>	Unlikely	Moderate	Moderate
Conservation Requirements	Negative impacts on environment and welfare of the animals, people and communities where the product / raw material is produced.	Unlikely	Major	High	<ul style="list-style-type: none"> <li>•Purchasing policy prohibiting purchasing endangered fish and other animals' species.</li> <li>•Supplier approval guidelines in place.</li> <li>•Purchase food that is seasonal and local, consider more plant-based menu options</li> </ul>	Rare	Major	High

5. Social and Cultural Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Low socioeconomic vulnerability	Staff hired from afar instead of working closely with the local community.	Almost certain	Moderate	High	<ul style="list-style-type: none"> <li>•Employment and contract services offered to people within the local community where possible.</li> <li>•On site staff accommodation available.</li> </ul>	Likely	Minor	High
Unintentional misunderstandings in cultural customs	As our team members and guests come from all over the world with many different cultural backgrounds, there is the potential for unintentional misunderstandings in cultural customs.	Likely	Moderate	High	<ul style="list-style-type: none"> <li>•Staff training to ensure care and understanding when working with people from different cultural backgrounds</li> <li>•A complaint management system is in place for incident monitoring and management.</li> </ul>	Unlikely	Moderate	Moderate

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<p>Low staff morale</p>	<p>Employee morale is the satisfaction, attitude, and outlook that people have on the job. Low morale causes people to make more mistakes, leading to customer dissatisfaction, negative downstream repercussions, and workplace accidents.</p>	<p>Almost certain</p>	<p>Major</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Training programs in place to further learning and career opportunities</li> <li>• Regular performance reviews</li> <li>• Service charge added to all bills which will be higher based on sales performance.</li> <li>• Extracurricular activities programs in place</li> <li>• Staff engagement survey to gauge satisfaction</li> <li>• Staff benefit schemes in place</li> <li>• Meditation sessions for team members</li> <li>• Long service additional days off</li> <li>• Birthday extra day off</li> <li>• Employees' award</li> <li>• Enhanced staff wellbeing areas</li> </ul>	<p>Unlikely</p>	<p>Major</p>	<p>High</p>
<p>Use of recreational drugs by team members</p>	<p>Recreational drugs are chemical substances taken for enjoyment rather than for medical reasons. Alcohol, tobacco and caffeine can be classed as recreational drugs but are not covered in this leaflet. Recreational drugs are usually started to provide pleasure, or improve life in some way. However, they can lead to addiction, to health and social problems and to crime. Most are illegal, so their use comes with all the consequences of breaking the law.</p>	<p>Almost certain</p>	<p>Major</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Management made aware and trained on how to react to suspicion of issue.</li> <li>• Information session to all team members on the risk of use of recreational drugs</li> <li>• Partnership with Hospitality Rewards for all team members to be able to reach for help anonymously.</li> <li>• Each employee is covered by E.A.P. (Employee Assistance Programme), which give them full support on any addictions.</li> </ul>	<p>Moderate</p>	<p>Moderate</p>	<p>High</p>

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6. Land use Planning and Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Accessibility	The design and construction of buildings and/or infrastructure will provide access for persons with special needs.	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>•Hotel and Spa Reception area fully accessible</li> <li>•Ramps available for area with stairs indoors</li> <li>•Lift to rooms and one fully accessible bedroom</li> <li>•Bar terrace, kitchen garden and donkey courtyard wheelchair accessible</li> <li>•Lawns partially accessible</li> </ul>	Unlikely	Moderate	Moderate
Habitat conservation	Impact on local ecosystems from guest activities on the gardens	Likely	Moderate	High	<ul style="list-style-type: none"> <li>•Rewilding of garden</li> <li>•Redevelopment and diversification of wildflower meadows</li> <li>•Bird hide to minimise disturbance</li> <li>•Beehive left undisturbed</li> </ul>	Unlikely	Moderate	Moderate
Loss of biodiversity	Soil not supporting life leading to a loss of diversity	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>•In 2023, the courtyard has been excavated of soil and replaced with topsoil proven to be more suited to a wide range of biodiversity.</li> <li>•Soil amelioration by use of biochar and mycorrhizal fungi, capturing carbon, creating healthier plant ecosystems, and enhancing biodiversity</li> <li>•The courtyard has been planted with a wide and diverse planting (all from peat-free nurseries) which will provide interest to pollinators</li> <li>•The wildflower meadow has been extended. This represents the most biodiverse habitats in Britain, with up to 80 species recorded per m2</li> </ul>	Low likelihood	Mild	Medium

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7. Air Quality Protection								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Poor indoor air quality	Working from inside an office for extended amounts of time without sufficient air circulation could lead to health issues	Likely	Major	Extreme	<ul style="list-style-type: none"> <li>• Air handling unit in place to circulate pool area in the spa. New system planned for 2027.</li> <li>• Windows opened when conditions allows.</li> <li>• Added air purifying plants</li> <li>• Staff encourage to take a walk ever so often</li> </ul>	Unlikely	Major	High
Air pollution impact of goods travelling	Increase in GHG Emissions	Almost certain	Moderate	Extreme	<ul style="list-style-type: none"> <li>• Working with suppliers to optimise delivery routes</li> <li>• See Greenhouse Gas Emissions Section</li> </ul>	Likely	Moderate	High

8. Wastewater Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Sewage water integrity	Dirty wastewater and other pollutants could be released in the environment	Likely	Catastrophic	Extreme	<ul style="list-style-type: none"> <li>• All wastewater is pumped to the sewage treatment plant.</li> <li>• Discharge of any wastewater is done so in accordance with international standards.</li> <li>• Regular monitoring by the Environment Agency.</li> </ul>	Unlikely	Major	High

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9. Solid Waste Management								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Waste separation and recycling practices	Inadequate waste separation and recycling practices may result in increased volumes of waste sent to landfill, higher waste management costs, unnecessary use of natural resources, and increased greenhouse gas emissions. Poor segregation may also lead to contamination of recyclable waste streams, reduced recycling effectiveness, non-compliance with local waste regulations, and reputational risk associated with failure to meet environmental sustainability commitments.	Likely	Major	Extreme	<ul style="list-style-type: none"> <li>• Waste management plan in place</li> <li>• A switch to paperless options where possible, e.g., banking, invoicing, payslips etc.</li> <li>• All paper, metal, plastics, cardboard, glass bottles, cooking oil, printer cartridges and more get recycled</li> <li>• Separation of food waste and compost waste.</li> <li>• Compost made and used in gardens.</li> <li>• Furniture, soft furnishings, electrical items and other items are sold, donated to charity or disposed accordingly.</li> <li>• Single use plastics phased out.</li> <li>• Waste removal company creating energy, zero waste to landfill.</li> <li>• Staff training in place</li> </ul>	Unlikely	Moderate	Moderate

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10. Environmentally Harmful Substances								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Cleaning Products	Contamination and pollution of waterways as a result of toxic and hazardous chemicals	Likely	Moderate	High	<ul style="list-style-type: none"> <li>• Bio-based and natural cleaners purchased.</li> <li>• Safely stored. In trays if needed</li> <li>• No drain leading to waterway where chemicals are stored</li> </ul>	Unlikely	Moderate	Moderate
Pesticide	Risk for local fauna and dogs	Likely	Major	Extreme	<ul style="list-style-type: none"> <li>• No more harmful products on property since 2021</li> <li>• Remaining harmful products disposed of responsibly in 2021 and 2024. (certified)</li> <li>• Replaced with natural products</li> </ul>	Rare	Minor	Low

**RISK ASSESSMENT FORM**

EMERGENCY								
Aspect	Potential Impact(s)	Likelihood	Severity & Reversibility of Impact	Risk Evaluation	Risk Minimisation / Mitigation Strategy	Likelihood	Severity & Reversibility of Impact	Risk Evaluation
Fire	Fire produces air pollutants lowering the air quality and can potentially impact on the overall health of the surrounding environment.	Likely	Catastrophic	Extreme	<ul style="list-style-type: none"> <li>•Electrical appliances monitored and regularly tested. (PAT test)</li> <li>•Equipment such as smoke detectors, fire extinguishers, fire doors and compression systems are installed and fully maintained by competent contractors.</li> <li>•Smoking is not permitted</li> <li>•All staff receive fire training</li> <li>•Adequate fire marshals on site at any given time</li> <li>•Public and environmental health consultants contracted</li> <li>•Barbecue banned on property for live-in staff.</li> <li>•Candles removed from use on property.</li> </ul>	Unlikely	Major	High
Floods	<p>Climate change increases the frequency and intensity of weather events (i.e. heavy storms, rainfalls and cyclones etc.) leading to potentially devastating floods. Flooding can cause a range of environmental and health impacts to the surrounding environment and communities such as contamination of waterways, contaminated drinking water, hazardous material spills, and community disruption and displacement.</p> <p>Hotel basement likely to flood due to water table under property.</p>	Likely	Moderate	High	<ul style="list-style-type: none"> <li>•Adequate flood planning in place including evacuation procedures.</li> <li>•Close monitoring by Duty Manager and Maintenance of the boiler room where water can penetrate first during heavy rain.</li> <li>•All goods stored on pallets to keep them raised and off the water in case of flood water ingress.</li> </ul>	Moderate	Minor	Moderate

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<p>Food Health &amp; Safety</p>	<p>Any staff or guests who consumes food is at risk of contracting a food-borne illness, food allergy or food poisoning.</p>	<p>Likely</p>	<p>Major</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Ensuring that all food supplied is cleaned/washed properly before consumption.</li> <li>• Checking fridge temperature daily.</li> <li>• Storing food in an appropriate manner.</li> <li>• Open food labelled with opening dates monitored.</li> <li>• Food safety consultant retained.</li> <li>• Ensuring dietary requirements are strictly followed.</li> <li>• Standard to avoid cross contamination</li> </ul>	<p>Unlikely</p>	<p>Moderate</p>	<p>Moderate</p>
<p>Disease, virus outbreak or other illness</p>	<p>As population continues to increase and diseases/viruses continue to evolve, staff can be at risk of viral illness which can possibly impact the wellbeing of another staff member or guests.</p>	<p>Likely</p>	<p>Major</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Emergency procedures in place for guests and staff in the event of an outbreak.</li> <li>• Good hygiene procedures followed by staff at all times.</li> <li>• Work from home options are available.</li> <li>• Public and environmental health consultants contracted.</li> </ul>	<p>Moderate</p>	<p>Moderate</p>	<p>High</p>
<p>Food supply</p>	<p>Some food is becoming more difficult to source due to climate change and wars</p>	<p>Almost certain</p>	<p>Moderate</p>	<p>Extreme</p>	<ul style="list-style-type: none"> <li>• Adapt menus and offering based on available supply.</li> <li>• Use seasonal products whenever possible.</li> <li>• Plan ahead and make some provision within reason.</li> <li>• Increase production on property in Kitchen Garden.</li> </ul>	<p>Likely</p>	<p>Moderate</p>	<p>High</p>

**RISK ASSESSMENT FORM****Risk to Sustainability Action Plan Mapping (Clauses 3.3 & 4.1)**

This section demonstrates the linkage between risks identified and actions implemented through the Sustainability Management System.

Energy consumption risks → Sustainability Action Plan

Water consumption risks → Sustainability Action Plan

Waste management risks → Sustainability Action Plan and Waste Management Plan

Biodiversity and ecosystem risks → Sustainability Action Plan and Biodiversity Audit

Staff wellbeing and morale risks → Sustainability Action Plan

Emergency risks (Fire, Flood, Disease) → Emergency Response Procedures in Duty Manager online folder

## Review

Date	Name	Position	Version	Key changes since last review
03.08.2022	Charlotte Land Magaly Etter	H&S consultant Supply Chain Officer	V1	
02.09.2022	Magaly Etter	Supply Chain Officer	V2	Add some mitigation strategies
25.07.2023	Magaly Etter	Supply Chain Officer	V3	Modified some mitigation strategies New aspect under social management and emergency
29.02.2024	Magaly Etter	ESG Manager	V4	Validated for audit
18.04.2025	Magaly Etter	ESG Manager	V5	Risk evaluation table updated to 5 level of consequences Risk minimisation updates
03.02.2026	Magaly Etter	ESG Manager	V6	Added comment from audit report about area of improvement