

# Sustainability policy of Black Mountain Montenegro Ltd

2025 - 2027



## Forward

*"As one of the least-spoiled tourism destinations in Europe, Montenegro offers rich cultural and natural diversity and many amazing less visited attractions. Montenegro has still not been adversely impacted by visitor overcrowding and mass tourism. Much of the tourism industry is still characterised by locally owned small businesses, offering authentic experiences and a traditional welcome that is slow paced and genuine. In recent years the popularity of Montenegro has grown for exactly these reasons. That increasing popularity is attracting the interests of big business and international investors keen to take ownership of the main attractions and convert Montenegro into a profitable income stream for large scale commoditised tourism.*

*The call to action in much of Montenegro's marketing echoes the theme, 'get here before its ruined by tourism!' as has happened so often in the beautiful and unspoiled places around the world. In Montenegro we hope to reverse this trend through cooperation with our many local partners and suppliers and by leading by example. Montenegro should never become 'a cheap destination' for sun and sand, it already offers incredible value for money for discerning travellers who value authentic travel".*

*Jack Delf – co-founder of Black Mountain 2024 for National Geographic.*

## Purpose

Black Mountain is committed to developing and delivering authentic travel experiences which preserve and protect local culture, heritage and the environment, and which benefit local communities in Montenegro. The purpose of this policy is to set out the issues which are important to our company and the commitments we will make over the next 2-year period.

## Policies

### **1. Sustainability management & legal compliance**

#### **1.1 Sustainability commitment**

- Black Mountain is committed to developing and improving our sustainability performance in accordance with our sustainability mission statement and policy.
- We will use the Travelife platform to report on our sustainability progress and to monitor and evaluate progress. We are committed to (publicly) communicating our sustainability performance (by means of the Travelife report) accessible on our web site, every two years.
- We are committed to the continuous improvement of sustainability practices, including the ongoing monitoring and evaluation of our sustainability policy, allocating time and resources to achieve our sustainability goals.

- Black Mountain follows all local, regional, national, and international regulations as they relate to human resources, human rights, children's rights, land rights, environmental management, wildlife, and land use. We have a zero-tolerance policy for corruption, bribery, forced and child labour, and discrimination.

### **1.2. Suppliers and sub-contracted employees**

- We recognize that our local suppliers and sub-contracted employees such as guides and tour leaders are our biggest asset for delivering meaningful travel experiences to our customers. Therefore, we maintain a clear policy to ensure:
  - Legal compliance in all regards
  - A safe working environment
  - Fair contract conditions including fair compensation.
  - Training opportunities including trainings on the topics of sustainability, safety & risk, guide skills and personal development.
  - Participation in sustainability planning activities.
  - Inclusion and equal opportunity for all sub-contracted employees, particularly with regard to compensation.
- Black Mountain is committed to a zero-tolerance policy for acts of bribery, corruption, discrimination, and violation of human rights, including forced labour, human trafficking, and all rights of children.
- Black Mountain further expects this commitment from all partners and suppliers as stated in our Working Policies.

### **1.3. Internal management: environment**

- Environmental management of office operations
- We are committed to keeping the direct footprint of our business operations as minimal as possible and reduce, reuse, repurpose and recycle where possible.
- Our procurement policy favours locally produced supplies, where possible including Fairtrade products and sustainably certified products where available (i.e. paper).
- Our home office energy usage is set to energy saving where possible and we monitor energy and water usage.

### **1.4. General suppliers policy**

- Black Mountain is committed to sourcing its products and services responsibly, avoiding harmful impacts on society, culture and nature as much as possible. We expect the same level of engagement and commitment from our suppliers.
- We prefer to work with suppliers in the destinations that are locally owned or managed, use local and seasonal products and services and benefit the local community by hiring locally and equitably and by providing fair working conditions.

- We expect our suppliers to adhere to the following responsible business practices:
  - Complying with all local, regional, national and international regulations
  - Respecting all human rights including labour rights, children's rights, and women's rights
  - Committing to fair employment conditions
  - Following anti-corruption, anti-bribery, anti-extortion, and anti-discrimination policies
  - Protecting children from (sexual) exploitation through tourism
  - Protecting the environment and natural resources
  - Acting in the best interest of local communities

Our complete Supplier Working Policy is available [here](#).

- Following a zero-tolerance policy, Black Mountain will terminate any relationships with suppliers that violate our policy, specifically through acts of bribery, corruption, discrimination, and violation of human rights and the treatment of animals would or domestic.
- We will raise awareness amongst our suppliers to adopt sound social and environmental practices, and to minimise their carbon footprint.
- We will inform our suppliers about the business case for sustainability, the preservation of authentic and unspoiled nature and culture as tourism assets and the market demand for sustainable travel among higher spending visitors.
- We will actively collaborate with suppliers to improve their sustainability performance. We encourage our suppliers to continuously learn about sustainability and support this learning whenever possible.
- Our partners are provided with practical knowledge and factsheets about sustainable tourism through the Western Balkans Geotourism Network a non-profit organisation which Black Mountain manages on behalf of local tourism businesses.
- We maintain open communication with our suppliers and partners and encourage feedback from our stakeholders at any time and on any topic.

## 1.5. **Inbound partner agencies**

- Black Mountain expects inbound partner agencies to follow the company's Working Policy for Suppliers.
- In the process of developing and operating our travel packages, Black Mountain expects partner agencies to act in the best interests of the surrounding communities and environment as well as our guests.
- Black Mountain provides partner agencies opportunities for sustainability learning and management, including free access to the Travelife online learning and reporting platform, advice on Leave No Trace ethics and (where relevant) introduction and commitment to sign up to the Adventure Travel Guide Standard.

### 1.5.1. **Transport**

- Black Mountain will request transport providers to adhere to the company's Working Policy for Suppliers.
- We encourage the following measures:
  - Preferring ground transport over air transport for short-haul travel destinations.
  - Using public transportation options in the destinations where appropriate and available.
  - Using appropriate vehicle sizes for group sizes and purchasing most efficient vehicles available.
  - Favouring vehicle rental agencies which offer hybrid or low emissions vehicles.

- Prioritize the promotion of overnight and multi-day trips within Montenegro instead of multiple day trips from coastal locations. This will disperse tourism, benefit inland accommodation providers and reduce travel times and energy use.

#### 1.5.2. Accommodations

- We request accommodations to follow our Working Policy for Suppliers.
- In the accommodation selection process, we consider the sustainability practices of an accommodation by considering their sustainability management and social and environmental footprint.
- We favour the selection of accommodations that respect and protect land use, as well as respectfully highlight elements of local architecture, customs and traditions.

#### 1.5.3. Activities & Excursions

- We ask excursion providers to adhere to our Working Policy for Suppliers.
- We request that excursions and activities respect local customs, traditions, cultural integrity, and natural resources.
- We are committed to not offering any excursions that harm humans, wildlife and domestic animals, environment, or natural resources such as water and energy.
- We give preference to excursions and activities that benefit local communities, respect animal welfare and support environmental protection.
- We follow local and international guidelines for environmentally and culturally sensitive excursions. These guidelines are actively communicated to guests by us and by excursion providers and guides.
- We will offer excursion and attraction providers opportunities for sustainability learning and management, including free access to the Travelife online learning and reporting platform, introduction to Leave No Trace ethics and free training resources.

#### 1.5.4. Tour leaders, local representatives, and guides

- We are committed to hiring qualified local guides, porters, drivers or other local staff, paying them living wages and providing safe and fair working conditions. We expect the same from our suppliers that are hiring local staff on our behalf.
- We understand that guides are the intermediaries between the guests and the socio-cultural and environmental context of the destination, conveying the appropriate behaviour to them. Therefore, we make sure that all guides hired by or leading tours on our behalf are trained regularly and knowledgeable in the sustainability topics of the destination.
- We will provide guides with learning opportunities on sustainability topics including providing free access to the Travelife online learning platform.
- We require that adventure guides and tour leaders who work directly or indirectly with us, familiarise themselves with the Adventure Travel Guide Standard and commit to following the principles and practices contained therein, as well as committing to signing up to the Standard. We provide further training on this topic.

Our Working Policy for Guides & Tour Leaders can be found [here](#).

## **2. Destinations**

### **2.1. Sustainable destinations**

- We prefer to work in local destinations that have committed to sustainability as an integral part of community and destination development, i.e. National Parks, Green Destinations locations, etc.
- We design our tour itineraries to focus on bringing visitors to secondary or lesser-known tourist areas to avoid overcrowding in more popular areas and to schedule any remaining visits to busy areas outside of the peak times.

### **2.2. Contribution to local communities / local economic network**

- We commit to the positive contribution to the destinations in which we operate, by:
  - Sourcing locally and responsibly, supporting local and traditional arts and culture and including local events into our tour calendar.
  - Encouraging guests to shop responsibly and educating them about illegal/prohibited/forbidden souvenirs.
  - Collaborating with other local tourism stakeholders [including local government, other tourism businesses, academia, community groups] to further the sustainable tourism development of the destination.
  - Respecting and advocating for all human rights as well as land rights.

### **2.3. Environmental stewardship in destinations**

- We commit to environmental stewardship in the destinations in which we operate by:
  - Ensuring natural resources remain intact.
  - Educating guests about the principles of responsible travel and responsible visitor behaviour.
  - Educate all outdoor guides about Leave No Trace and make it a requirement that they have completed a minimum 1 day Leave No Trace Seminar or have completed the online Leave No Trace training [here](#).
  - Following the ethics of Leave No Trace

## **3. Customer communication and protection**

### **3.1. Privacy**

- Our customer protection is our priority. Therefore, we maintain a clear [privacy policy](#) to ensure:
  - Legal compliance in all regards.
  - Customers and their data are protected.
  - Customers know how their information is being used.
  - Become fully compliant with EU GDPR regulations concerning data protection.

### **3.2. Marketing and communication**

- We strive to always be truthful in all situations. We offer products and services that accurately match all claims or descriptions in our communications.
- We honour our commitments and promises.
- We endeavour to be inclusive and representative in our marketing, and to always consider cultural, religious, and ethnic sensitivities.

### **3.3. Sustainability communication**

- Black Mountain customers are informed about the social and environmental impact of their journey, and are educated about the sustainable choices they can make, including transparent communication on:
  - Certified accommodations / accommodations which offer sustainable stays and are committed to sustainable practices.
  - Activities and excursions that benefit the local communities and environmental protection.
  - Responsible shopping and illegal souvenirs.

### **3.4. Customer experience**

- Black Mountain aims for all customer experiences to be positive, and follows strict health and safety, marketing, and excursion policies to ensure customer satisfaction. These policies cover specific topics of (but not limited to):
  - Health and safety
  - Emergency procedures
  - Privacy
  - Group numbers
  - Transport
  - Shopping
  - Sexual exploitation
  - Children in tourism
  - Satisfaction and complaints

### **Contact / Responsible person.**

Black Mountain's Directors are responsible for the ownership and undertaking of this policy.

The implementation of this policy will be led by the Sustainability Coordinator, Jack Delf, who can be reached at [jack@montenegroholiday.com](mailto:jack@montenegroholiday.com).

### **Effective date**

This policy is effective from 14.06.2025.

## **Revision history**

This policy was created on 10.06.2025 (replacing our former Sustainability policy from 2023) This policy will be updated and revised by 14.06.2027.

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