

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Environmental Management Policy

R&M Property Group Ltd

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Version	2.0
Issued	28 September 2026
Approved by	Thom McKenna, Director
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1. Policy Statement

R&M Property Group Ltd (R&M) is a developer, development manager and design and build principal contractor delivering residential-led schemes for public sector clients, including local authorities and registered providers of social housing. We deliver our projects through a directly managed team and a supply chain of specialist subcontractors working under R&M's site management.

We recognise that construction has a significant effect on the environment through the materials it consumes, the waste and carbon it generates, and its potential to cause pollution, nuisance and harm to ecology. This policy sets out how R&M manages those impacts in a way that is proportionate to the nature and scale of our business, and who is responsible for doing so.

As Chair and Chief Executive, I have authorised this policy and I take personal responsibility for making sure it is resourced, implemented and kept under review.

Thom McKenna, Chair & Chief Executive Officer, R&M Property Group Ltd

2. Scope

This policy applies to all R&M directors, employees and workers, to every project and site R&M manages, and to all subcontractors, suppliers and consultants engaged by R&M. Compliance with it is a condition of working on R&M projects. It forms the environmental part of R&M's wider ESG Policy and sits alongside our Quality Management Policy and Procedures, Risk Management Policy and Sub-Contractor Selection and Monitoring Policy.

3. Our Significant Environmental Aspects

Given the type of work we do, the environmental aspects we manage most closely are:

- Construction, demolition and excavation waste, and packaging
- Materials use, including over-ordering, damage and wastage
- Carbon from site energy, plant, deliveries and travel, and embodied carbon in the materials we specify
- Pollution of drains, watercourses and land from silt, concrete wash-out, fuels and oils
- Dust, noise and vibration affecting neighbours and occupied buildings
- Ecology, trees and habitats on and around our sites

4. Our Commitments

R&M commits to:

- **Legal compliance:** comply with all applicable environmental legislation, permits and planning conditions, including the Environmental Protection Act 1990, the Environment Act 2021 and waste Duty of Care requirements, and to treat these as the minimum standard;

- **Pollution prevention:** take all reasonable steps to prevent pollution of water, air and land, including protecting drains, controlling silt and concrete wash-out, storing fuels and chemicals in bunded or drip-tray protected areas, and keeping spill kits on site;
- **Waste:** plan waste out at design and procurement stage, apply the waste hierarchy (reduce, reuse, recycle, recover, dispose), segregate waste on site, use only licensed waste carriers and sites, and keep waste transfer records for every load leaving site. We aim to divert at least 90% of construction waste from landfill;
- **Materials:** order accurately, check and record deliveries, protect stored materials from damage, return surplus materials to suppliers where possible, and use recycled or reclaimed materials where quality and safety allow;
- **Carbon and energy:** reduce energy use on site and in our offices, minimise vehicle and plant idling and journeys, and reduce embodied and operational carbon through fabric-first design and modern methods of construction (MMC), which cut site waste, concrete use and deliveries;
- **Nuisance:** plan working hours, plant selection and dust suppression to minimise disturbance, and keep neighbours and residents informed;
- **Ecology:** protect existing trees, hedgerows and habitats during construction, and deliver the ecology and biodiversity net gain requirements of each planning consent;
- **Continual improvement:** set environmental objectives, measure our performance and improve year on year.

5. How We Put This Policy Into Practice

- **Planning:** environmental risks are identified at tender and pre-start for each project, and controls are written into the construction phase plan, method statements and, where appropriate, a site waste management plan;
- **Supply chain:** subcontractors are assessed for environmental competence and compliance before appointment, and our environmental requirements are included in subcontract orders, in line with our Sub-Contractor Selection and Monitoring Policy;
- **Induction and training:** every person working on an R&M site receives an induction covering site environmental controls, waste segregation, spill response and how to report an incident. Toolbox talks are used to reinforce these;
- **Inspection and records:** site managers carry out regular inspections, and our site quality assurance records, including delivery records, material returns, off-site disposal records and drainage inspection sheets, provide an audit trail;
- **Incidents:** all environmental incidents and near misses are reported to the site manager and the Director of Operations the same day, investigated, and the lessons shared across projects. Where required, incidents are reported to the Environment Agency or local authority;
- **External assessment:** R&M's management systems, including environmental management, are independently assessed under Constructionline Gold (Common Assessment Standard).

6. Responsibilities

- **Thom McKenna (Chair & Chief Executive Officer):** Authorises this policy and has overall accountability for R&M's environmental performance. Makes sure adequate resources are provided, sets annual environmental objectives and reviews performance.

- **Jon Scurr (Director of Operations):** Responsible for environmental management on site, including pollution prevention, waste management, subcontractor compliance and the investigation of environmental incidents.
- **Frans Coetzee (Quality Manager / MMC Lead):** Leads on material efficiency, quality assurance records and modern methods of construction that support our environmental objectives.
- **Site and Project Managers:** Implement this policy on their sites day to day: induction, inspections, waste records, spill response and reporting incidents.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Monitors compliance, keeps training and inspection records, and supports incident reporting and the annual policy review.
- **Louis Howard (Procurement Manager, Enabl):** Makes sure environmental requirements are built into supply chain procurement, subcontract terms and supplier onboarding.
- **James Totton (Framework Lead - Strategic/Technical):** Make sure our environmental commitments are reflected in tenders, framework submissions and project delivery plans.
- **Lawrence Fox and Charles Andrews (Sustainability Advisers):** Provide specialist advice on carbon reduction, energy strategy, biodiversity and environmental design.
- **All employees, subcontractors and suppliers:** Follow this policy and site environmental rules, and report any spill, pollution or other environmental incident immediately.

7. Monitoring and Reporting

R&M monitors the following indicators and the Chair & CEO reviews them with the senior team each quarter:

- Construction waste produced and percentage diverted from landfill
- Environmental incidents, near misses and any enforcement action
- Energy and fuel use, and greenhouse gas emissions (Scope 1, 2 and reported Scope 3)
- Water use on site
- Biodiversity net gain delivered against planning requirements

8. Policy Review

This policy is reviewed at least once a year by the Chair & CEO and the Compliance Officer. It is also reviewed after any significant environmental incident, any material change in legislation, or a significant change to R&M's activities or client requirements. The next scheduled review is September 2027.

This policy is communicated to all employees at induction, displayed on site, issued to subcontractors with their orders and made available to clients and framework managers on request.

Revision History

Rev	Date	Description	Approved by
1.0	24 June 2026	Environmental commitments issued as Part A of the R&M ESG Policy	T McKenna
2.0	28 September 2026	Reissued as a standalone Environmental Management Policy; responsibilities and implementation arrangements expanded	T McKenna, Chair & CEO

Approved and Signed

Name: Thom McKenna

Position: Chair & Chief Executive Officer, R&M Property Group Ltd

Date: 28 September 2026