

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Environmental, Social and Governance (ESG) Policy

R&M Property Group Ltd

Document	RM-EN-02
Version	1.0
Issued	24 June 2026
Approved by	Thom McKenna, Director
Website issue	22 October 2026

1. Director's Statement

R&M Property Group Ltd is a developer and development manager delivering residential-led mixed-use schemes across the United Kingdom. We work within public sector procurement frameworks in partnership with local authorities, housing associations, NHS trusts, universities, and other public bodies. Our projects shape communities, create homes, generate employment, and transform places. With that comes a responsibility to conduct our business in a way that is environmentally sustainable, socially beneficial, and governed with integrity.

This Environmental, Social and Governance (ESG) Policy sets out R&M's commitment to embedding ESG principles across every aspect of our operations - from the land we acquire and the buildings we design, through the supply chains we manage and the communities we work within, to the way we govern our company and report on our performance. ESG is not a separate initiative within R&M; it is integral to how we do business and how we measure success.

I take personal responsibility for ensuring that this policy is implemented effectively and that ESG considerations are embedded in every significant business decision.

Thom McKenna, Director, R&M Property Group Ltd

2. Purpose and Scope

This policy provides the overarching framework for R&M's approach to ESG. It brings together our environmental, social, and governance commitments into a single, coherent statement and sets out the standards, objectives, and accountability structures that apply across the business.

This policy applies to all directors, employees, and workers of R&M Property Group Ltd, to all subcontractors, suppliers, consultants, and professional advisors engaged by R&M, and to all joint venture partners and development partners with whom R&M collaborates. It covers all R&M's business activities, projects, and operations.

This policy operates alongside and draws together the commitments set out in R&M's individual subject-specific policies, including the Carbon Reduction Plan, Modern Slavery Statement, Social Value Policy, Mental Health and Wellbeing Policy, Anti-Bribery and Corruption Policy, Cyber Security Policy, Financial Due Diligence and Subcontractor Selection Policy, Right to Work Verification Policy, and Health and Safety Policy. Where those policies provide detailed procedures, this ESG Policy provides the strategic context and the governance framework within which they sit.

PART A – ENVIRONMENTAL

3. Environmental Commitment

R&M recognises that the construction and property development industry has a significant environmental impact. The built environment accounts for approximately forty per cent of the UK's total carbon emissions, and the construction sector is a major consumer of raw materials,

energy, and water, and a significant generator of waste. R&M is committed to reducing its environmental impact progressively and measurably, contributing to the UK's legally binding target of net zero greenhouse gas emissions by 2050, and delivering developments that are environmentally responsible throughout their lifecycle.

3.1 Carbon Reduction

R&M has published a Carbon Reduction Plan in accordance with Procurement Policy Note PPN 06/21, setting out our current carbon footprint across Scope 1, Scope 2, and Scope 3 emissions and our pathway to achieving net zero. Our carbon reduction commitments include:

- Measuring and reporting our greenhouse gas emissions annually, using a recognised methodology consistent with the Greenhouse Gas Protocol
- Setting science-aligned reduction targets for operational and embodied carbon
- Prioritising energy efficiency in both our corporate operations and in the design and construction of our developments
- Transitioning our vehicle fleet to electric and hybrid vehicles as leases are renewed
- Procuring renewable electricity for our offices and, where possible, for construction site supplies
- Designing developments that minimise operational energy consumption through fabric-first approaches, high-performance insulation, efficient building services, and the incorporation of renewable energy technologies
- Reducing embodied carbon through material selection, modern methods of construction (MMC), local sourcing, and design for longevity and adaptability
- Offsetting residual emissions only after all reasonable reduction measures have been exhausted, using verified offset schemes

3.2 Biodiversity and Ecology

R&M is committed to delivering biodiversity net gain (BNG) on all developments in accordance with the Environment Act 2021, which requires a minimum ten per cent biodiversity net gain as a condition of planning permission. Where possible and appropriate, R&M aims to exceed this statutory minimum. Our approach includes:

- Commissioning ecological surveys and biodiversity assessments at the earliest stage of site acquisition and design
- Designing developments that retain and enhance existing ecological features - hedgerows, trees, watercourses, and habitats - wherever practicable
- Incorporating wildlife-friendly features into completed developments, including bat and bird boxes, wildflower meadows, sustainable drainage systems (SuDS) with ecological benefit, and native planting
- Registering biodiversity units on the national register and monitoring BNG delivery for the required thirty-year period

3.3 Waste and Circular Economy

R&M is committed to minimising waste across all its operations and to applying circular economy principles to the design, construction, and end-of-life stages of its developments:

- Preparing Site Waste Management Plans (SWMPs) for all projects, setting targets for waste reduction, reuse, and recycling
- Diverting a minimum of ninety per cent of construction waste from landfill, with a target of ninety-five per cent on new projects

- Designing for deconstruction and material recovery at end of life, in accordance with circular economy principles
- Prioritising the use of recycled and reclaimed materials where quality, performance, and safety standards are met
- Minimising packaging waste through engagement with suppliers and manufacturers

3.4 Water and Pollution Prevention

R&M takes all reasonable measures to prevent pollution of water, air, and land during construction and throughout the lifecycle of its developments. This includes compliance with Environment Agency regulations and best practice guidance, the use of sustainable drainage systems (SuDS) to manage surface water and reduce flood risk, the specification of water-efficient fixtures and fittings in completed developments, and the implementation of dust, noise, and vibration management plans on all construction sites.

PART B – SOCIAL

4. Social Value Commitment

R&M is committed to delivering measurable social value through its projects and operations. As a developer working within public sector frameworks, social value is not an add-on - it is a core obligation. R&M's Social Value Policy sets out our detailed approach to delivering against the National TOMs (Themes, Outcomes, and Measures) framework, but the key commitments are summarised here:

4.1 Employment, Skills, and Training

- Creating local employment opportunities on every project, with a commitment to advertising vacancies locally and working with local job centres and employment agencies
- Providing apprenticeships and trainee positions across construction trades, site management, and professional services, with a particular focus on supporting individuals from underrepresented groups
- Delivering work experience placements for school and college students, giving young people exposure to careers in construction and property development
- Investing in workforce training and development, including CITB-funded programmes, NVQs, and professional qualifications
- Paying the Real Living Wage as a minimum to all directly employed staff and encouraging supply chain partners to do the same

4.2 Community Engagement

- Engaging with local communities from the earliest stages of scheme design, through public consultation, resident engagement events, and ongoing dialogue throughout construction
- Establishing Community Liaison Officers on major projects to provide a single point of contact for residents and stakeholders
- Supporting local community organisations, charities, and voluntary groups through volunteering days, sponsorship, and in-kind contributions
- Working with construction industry mental health charities to promote wellbeing across the industry

4.3 Health, Safety, and Wellbeing

The health, safety, and wellbeing of everyone who works on or is affected by R&M's projects is a fundamental priority. R&M's commitments include:

- Maintaining a health and safety management system that complies with the Health and Safety at Work etc. Act 1974, the CDM Regulations 2015, and the Building Safety Act 2022
- Appointing competent Principal Designers and Principal Contractors for all projects
- Operating a three-tier mental health support framework, including trained Mental Health First Aiders on every project, as set out in R&M's Mental Health and Wellbeing Policy
- Promoting a culture of open reporting where near-misses and safety concerns are reported without blame, and where lessons are learned and shared across the business
- Monitoring leading and lagging health and safety indicators and reporting performance to the board quarterly

4.4 Equality, Diversity, and Inclusion

R&M is committed to equality of opportunity in employment and in the delivery of its services. We value diversity and recognise that a workforce that reflects the communities we serve produces better outcomes for everyone. Our commitments include:

- Operating fair and transparent recruitment processes free from discrimination on any protected characteristic under the Equality Act 2010
- Monitoring workforce diversity data and setting objectives for improving representation, particularly at senior and site leadership levels
- Providing equality and diversity training to all employees as part of induction and through annual refreshers
- Designing developments that are inclusive and accessible, meeting or exceeding the requirements of Approved Document M and the principles of inclusive design

4.5 Modern Slavery and Ethical Labour

R&M has a zero-tolerance approach to modern slavery, human trafficking, and labour exploitation in all forms. Our Modern Slavery Statement and Right to Work Verification Policy set out the detailed procedures, but the key commitments are:

- Verifying the right to work of every individual on our projects through rigorous induction procedures, as detailed in our Right to Work Verification Policy
- Requiring all supply chain partners to confirm their compliance with the Modern Slavery Act 2015 and to maintain their own right to work checking procedures
- Training our workforce to recognise and report indicators of modern slavery, forced labour, and exploitation
- Cooperating with the Gangmasters and Labour Abuse Authority (GLAA) and reporting any concerns to the Modern Slavery Helpline

4.6 Affordable Housing and Place-Making

As a residential-led developer, R&M has a direct role in addressing the housing crisis. Our social commitments in this area include delivering policy-compliant affordable housing on every scheme (and exploring opportunities to exceed policy requirements where viability allows), designing high-quality homes and places that promote health, wellbeing, and community cohesion, meeting or exceeding the Nationally Described Space Standards, and creating public realm, green spaces, and community infrastructure that serve the long-term needs of residents and communities.

PART C - GOVERNANCE

5. Corporate Governance

R&M Property Group Ltd is a private limited company. While not subject to the corporate governance reporting requirements that apply to large companies under the Companies (Miscellaneous Reporting) Regulations 2018, R&M voluntarily adopts good governance practices that are appropriate to the scale and nature of its business and that reflect the expectations of public sector clients and framework bodies.

5.1 Board Oversight and Accountability

The Director, Thom McKenna, has overall responsibility for the company's ESG performance and for ensuring that ESG considerations are integrated into strategic decision-making. ESG performance is reviewed at board level quarterly, covering environmental metrics (carbon emissions, waste diversion, energy consumption), social value delivery (local employment, apprenticeships, community contributions), health and safety performance, compliance matters, and stakeholder feedback. Where R&M works in joint venture or development partnership structures, ESG governance arrangements are agreed with the partner organisation at the outset and documented in the partnership agreement.

5.2 Anti-Bribery and Corruption

R&M maintains a comprehensive Anti-Bribery and Corruption Policy that reflects our zero-tolerance approach to bribery in all its forms. The policy covers all four offences under the Bribery Act 2010, establishes clear rules on gifts, hospitality, and entertainment (with a twenty-five pound recording threshold and one hundred pound approval threshold), prohibits facilitation payments and political donations, and sets out whistleblowing procedures with external reporting routes to the Serious Fraud Office and National Crime Agency. The policy is particularly important in the context of public sector framework work, where the integrity of procurement decisions is paramount.

5.3 Financial Integrity and Due Diligence

R&M operates with financial transparency and integrity across all its business dealings. Our Financial Due Diligence and Subcontractor Selection Policy establishes a risk-based approach to assessing the financial standing of subcontractors, suppliers, and development partners, using credit reference agencies, Companies House verification, and solicitor-led due diligence for significant transactions. Our PAYE department verifies UTR numbers and CIS tax status for all subcontractors. These procedures protect both R&M and our Client Organisations against the risks of supply chain financial failure, and ensure that public money is spent through solvent, tax-compliant businesses.

5.4 Cyber Security and Data Protection

R&M's Cyber Security Policy sets out our approach to protecting company, client, and personal data. R&M holds Cyber Essentials certification and has committed to achieving Cyber Essentials Plus by October 2027. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. In the context of developer-led schemes, we handle commercially sensitive information including land valuations, development appraisals,

public sector financial data, and personal data of residents and stakeholders, and our cyber security measures are designed to protect this information throughout the project lifecycle.

5.5 Procurement and Supply Chain Governance

R&M is committed to responsible, transparent, and fair procurement practices. Our approach includes:

- Selecting subcontractors and suppliers through competitive, transparent processes that consider quality, capability, financial standing, and social value alongside price
- Paying supply chain partners promptly and in accordance with agreed terms, supporting cash flow and financial stability throughout the supply chain
- Requiring all supply chain partners to comply with R&M's ESG standards as a condition of engagement, including environmental management, health and safety, modern slavery, anti-bribery, and right to work verification
- Monitoring supply chain compliance through onboarding assessments, contractual obligations, site induction checks, and periodic audits
- Encouraging and supporting SME and local business participation in our supply chain, in alignment with the social value objectives of our Client Organisations

5.6 Regulatory Compliance

R&M complies with all applicable legislation, regulation, and statutory guidance relevant to its business. In the context of developer-led schemes within public sector frameworks, this includes but is not limited to the Procurement Act 2023, the Building Safety Act 2022 (including the requirements for higher-risk buildings), the Planning Act 2008 and Town and Country Planning Act 1990, the Environment Act 2021, the Health and Safety at Work etc. Act 1974, the CDM Regulations 2015, the Equality Act 2010, the Bribery Act 2010, the Modern Slavery Act 2015, and the Immigration, Asylum and Nationality Act 2006. R&M monitors changes in legislation and regulation through its professional advisors, industry bodies, and the framework management team, and updates its policies and procedures accordingly.

5.7 Whistleblowing and Reporting

R&M maintains open and accessible channels for reporting concerns about any aspect of ESG performance, legal compliance, or ethical conduct. Concerns can be raised directly with the Director, with the H&S Adviser (Phillip Hollingworth, Spectra Safety), or through external reporting routes where appropriate. All reports are treated confidentially and investigated thoroughly. No individual will suffer any detriment as a result of raising a genuine concern in good faith. This commitment is protected under the Public Interest Disclosure Act 1998.

6. Stakeholder Engagement and Transparency

R&M is committed to open, transparent engagement with all its stakeholders on ESG matters. Our principal stakeholders include:

- Client Organisations - local authorities, housing associations, and other public bodies who procure development services through the frameworks we sit on
- Framework managers and contracting authorities
- Residents and communities affected by our developments
- Our workforce, including directly employed staff, agency workers, and supply chain operatives

- Subcontractors, suppliers, and professional advisors in our supply chain
- Regulators, including the Health and Safety Executive, Environment Agency, and local planning authorities
- Industry bodies, including CITB and professional institutions

R&M provides ESG information to Client Organisations and the Framework Manager as part of the call-off process, during project delivery, and through framework reporting. We welcome audits, inspections, and information requests in relation to any aspect of our ESG performance and will cooperate fully with any such exercise.

7. Measurement, Targets, and Reporting

R&M measures its ESG performance against a set of key indicators that are reviewed and updated annually. These include:

7.1 Environmental Metrics

- Total greenhouse gas emissions (Scope 1, 2, and reported Scope 3 categories) measured in tonnes of CO2 equivalent
- Construction waste diversion from landfill (percentage)
- Biodiversity net gain delivered (percentage above baseline)
- Energy consumption per project (kWh)
- Water consumption per project (cubic metres)

7.2 Social Metrics

- Local employment created (number of jobs, percentage local workforce)
- Apprenticeships and training positions created
- Work experience placements delivered
- Community volunteering hours contributed
- Accident Frequency Rate (AFR) and accident incidence rate
- Mental health training coverage (percentage of workforce with access to a trained MHFA)
- Supply chain prompt payment performance (percentage paid within terms)

7.3 Governance Metrics

- Anti-bribery training completion rate (percentage of eligible personnel)
- Right to work verification compliance rate (percentage of inductions with verified documents)
- Supply chain pre-qualification completion rate
- Cyber security certification status
- Number of reportable compliance incidents
- Whistleblowing reports received and outcomes

ESG performance is reported to the board quarterly, shared with Client Organisations and the Framework Manager as requested, and published in R&M's annual ESG summary. Targets are set annually by the Director in consultation with the senior team and are designed to drive continuous improvement.

8. Continuous Improvement

ESG performance is not static. R&M is committed to continuous improvement across all three pillars of ESG. We achieve this through regular review and updating of our policies and procedures, benchmarking against industry best practice and framework expectations, learning from project experience and stakeholder feedback, investing in training and development for our workforce, engaging with industry initiatives and working groups on sustainability, social value, and governance, and incorporating ESG lessons into our pre-qualification and project review processes.

R&M also recognises that as a small company, our greatest ESG impact often comes through the schemes we deliver and the supply chains we manage. We therefore focus not only on our own direct ESG performance but on influencing positive outcomes through our design choices, our procurement decisions, and our partnerships with Client Organisations and supply chain partners.

9. Responsibilities

- **Thom McKenna (Director):** Overall accountability for ESG performance. Approves this policy, sets strategic ESG objectives, reviews performance quarterly, and ensures ESG is integrated into business decision-making.
- **James Totton (Framework Lead - Strategic/Technical):** Ensures ESG commitments are reflected in framework submissions, call-off responses, and project delivery plans.
- **Jon Scurr (Director of Operations):** Responsible for environmental management on site, waste management, pollution prevention, and health and safety performance.
- **Frans Coetzee (Quality Manager / MMC Lead):** Leads on modern methods of construction, material efficiency, quality assurance, and construction innovation that supports environmental and quality objectives.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for health and safety, mental health and wellbeing, right to work verification, training records, whistleblowing, and compliance monitoring.
- **Jill Pegoraro (Social Value Lead):** Leads social value planning, delivery, and reporting for each project, including local employment, apprenticeships, community engagement, and TOMs measurement.
- **Louis Howard (Procurement Manager, Enabl):** Ensures ESG requirements are embedded in supply chain procurement, subcontract terms, and supplier onboarding.
- **Lawrence Fox and Charles Andrews (Sustainability):** Provide specialist sustainability advice on carbon reduction, energy strategy, biodiversity, and environmental design.
- **Ian Skates (Financial Director):** Oversees financial governance, prompt payment performance, CIS compliance, and financial due diligence.
- **Chris Walker (IT Support):** Supports cyber security implementation, Cyber Essentials certification, and data protection measures.

10. Policy Review

This policy is reviewed annually by the Director and the Compliance Officer. The next scheduled review date is June 2027. The policy will also be reviewed following any significant

ESG incident, any material change in legislation or regulatory guidance, any change in framework requirements, or upon feedback from Client Organisations, the Framework Manager, or other stakeholders.

Approved and Signed

Name: Thom McKenna

Position: Director, R&M Property Group Ltd

Date: 24 June 2026

This policy will be published on the R&M Property Group Ltd website and available to all employees, supply chain partners, and framework clients upon request.

Please print name, sign and date below your agreement to this policy -