

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Environmental Monitoring and Review Procedure

R&M Property Group Ltd

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Approved by	Thom McKenna, Director
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1. Purpose

This procedure sets out how R&M Property Group Ltd (R&M) checks, reviews and improves its environmental management performance. It describes the system R&M uses to monitor its environmental procedures on an ongoing basis, to act on what that monitoring finds, and to update its policy and procedures at planned intervals.

It applies to the Environmental Management Policy (Rev 2.0), the Environmental Implementation Plan (Rev 1.0) and the Environmental Training Plan (Rev 1.0), and to all R&M projects and its office.

2. Monitoring Cycle

Environmental performance is monitored at five levels:

Frequency	Activity	Who	Record
Daily	Site checks of drains, fuel storage, waste areas, dust and noise controls during the site manager's walk-round	Site manager	Site diary
Weekly	Weekly Site Environmental Inspection Checklist; actions closed out	Site manager	Checklist (Implementation Plan, Appendix B)
Monthly	Independent site audit on every live project, covering environmental controls, waste and Duty of Care records, energy readings, incidents, complaints and training records	Spectre Safety	Audit report with actions
Monthly	Waste contractor returns (tonnage and landfill diversion); meter readings and fuel use	Site manager / Compliance Officer	KPI tracker (Appendix C)
Quarterly	Management review of KPIs, audit findings, incidents, complaints and open corrective actions	Chair & CEO with senior team	Management Review Record (Appendix A)
Annually	Full management review; review of the policy, plans and this procedure; objectives and targets set for the next year	Chair & CEO and Compliance Officer	Management Review Record; revised documents
As needed	Review after any significant incident, complaint trend, change in law, client or framework requirement, or new type of work	Director of Operations / Compliance Officer	Incident investigation; revised documents

3. Key Performance Indicators and Targets

R&M measures its environmental performance against the following indicators. Results are recorded monthly on the KPI tracker and reported to the quarterly management review.

Indicator	Target
Construction waste diverted from landfill	At least 90%
Environmental incidents reportable to a regulator	Zero
Enforcement notices or prosecutions	Zero
Environmental complaints responded to within 5 working days	100%
Weekly site environmental inspections completed	100%
Spectre Safety monthly audits completed on live projects	100%
Audit and corrective actions closed by their due date	At least 90%
Monthly environmental toolbox talk delivered on each site	100%
Workforce environmental training and cards in date	100%
Timber purchased with FSC or PEFC certification	100%
Site energy and fuel use recorded monthly	100% of live projects; baseline set in 2026/27, then year-on-year reduction

4. Audits

- **Internal and adviser audits:** Spectre Safety, R&M's external health, safety and environmental adviser, audits every live project each month. Each audit report lists findings and actions with owners and due dates, and is sent to the Director of Operations and the Compliance Officer.
- **Management checks:** the Director of Operations or Quality Manager reviews audit reports monthly and checks on site that actions have been closed.
- **External assessment:** R&M's management systems are independently assessed under Constructionline Gold (Common Assessment Standard), which is renewed annually. Client and framework audits are welcomed and their findings are treated in the same way as internal findings.

5. Non-conformities and Corrective Action

Where monitoring, an audit, an incident or a complaint shows that a procedure has not been followed or is not working, R&M:

- records the issue on the Corrective Action Log (Appendix B)
- takes immediate action to control any environmental risk
- identifies the root cause
- agrees a corrective action with a named owner and due date
- checks that the action has been completed and has worked, before closing it
- shares any lessons across all sites through toolbox talks and, where needed, updates the relevant procedure or training

Open actions are reviewed monthly by the Director of Operations and quarterly by the management review. Overdue actions are escalated to the Chair & CEO.

6. Management Review

The Chair & CEO chairs a management review each quarter, with a full review once a year. The review considers:

- KPI results against targets and trends over time
- Spectre Safety audit findings and the status of corrective actions
- Environmental incidents, near misses and complaints
- Changes in environmental law, client and framework requirements
- Training status and any training needs
- Feedback from clients, communities, the workforce and subcontractors
- Whether the policy, procedures and resources are still suitable
- Progress against the year's environmental objectives

The review decides on any changes to the policy, procedures, objectives, targets, training or resources. Decisions and actions are recorded on the Management Review Record (Appendix A).

7. Updating Procedures

- **Planned review:** the Environmental Management Policy, Implementation Plan, Training Plan and this procedure are reviewed at least once a year at the annual management review.
- **Triggered review:** they are also reviewed after any significant incident, a trend in audit findings or complaints, a change in legislation, a change in client or framework requirements, or a significant change in R&M's work.
- **Document control:** each document carries a revision number, date and approval. Revised documents are approved by the Chair & CEO, issued to all managers, and superseded versions are withdrawn.
- **Communication:** changes are briefed to site teams through toolbox talks and inductions, and to subcontractors through pre-start meetings and subcontract orders.

8. Environmental Objectives 2026/27

- Record waste, energy and fuel data monthly on every live project, to set a baseline by March 2027
- Achieve at least 90% construction waste diversion from landfill across all projects
- Zero environmental incidents reportable to a regulator
- All site managers to hold CITB SEATS or an equivalent environmental qualification by September 2027
- Close at least 90% of Spectre Safety audit actions by their due date

9. Responsibilities

- **Thom McKenna (Chair & CEO):** chairs management reviews, approves changes to the policy and procedures, and sets objectives.
- **Jon Scurr (Director of Operations):** reviews monthly audit reports and KPIs, and makes sure corrective actions are completed.
- **Phillip Hollingworth (Compliance Officer):** maintains the KPI tracker and Corrective Action Log, prepares management review information and controls document revisions.
- **Spectre Safety:** carries out monthly site audits and reports findings.
- **Site and Project Managers:** carry out daily and weekly checks, provide monthly data and close out site actions.

Document Control

Rev	Date	Description	Approved by
1.0	28 September 2026	First issue	T McKenna, Chair & CEO

Approved and Signed

Name: Thom McKenna

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

Date: 28 September 2026

Appendix A - Environmental Management Review Record

Item	Details
Review type	☐ Quarterly ☐ Annual
Date	
Attendees	
KPI results and trends	
Audit findings and corrective action status	
Incidents, near misses and complaints	
Changes in law or client / framework requirements	
Training status	
Stakeholder feedback	
Suitability of policy, procedures and resources	
Progress against objectives	
Decisions and actions (owner / due date)	
Documents to be revised	
Approved (Chair & CEO) - signature and date	

Appendix B - Corrective Action Log

Ref	Date raised	Source (audit / incident / complaint / other)	Issue	Root cause	Action	Owner	Due	Closed and verified (date)

Appendix C - Environmental KPI Tracker

Project / period:

Indicator	Target	Q1	Q2	Q3	Q4	Year
Waste diverted from landfill (%)	≥ 90%					
Total waste (tonnes)	Record					
Reportable environmental incidents	0					
Near misses reported	Record					
Complaints received / responded to in 5 days	100%					
Weekly inspections completed (%)	100%					

Indicator	Target	Q1	Q2	Q3	Q4	Year
Spectre Safety audits completed (%)	100%					
Actions closed by due date (%)	≥ 90%					
Environmental toolbox talks delivered (%)	100%					
Training and cards in date (%)	100%					
FSC / PEFC timber (%)	100%					
Electricity used (kWh)	Record					
Diesel / fuel used (litres)	Record					