

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Supply Chain Environmental 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) makes sure that every subcontractor, supplier, consultant and waste contractor it engages applies environmental protection measures appropriate to the work they are engaged to do, and how R&M monitors their environmental performance throughout the supply chain.

It adds environmental requirements to R&M's Sub-Contractor Selection and Monitoring Policy (selection, pre-start verification, monitoring, scorecard and performance outcomes), and supports the Environmental Management Policy (Rev 2.0) and Environmental Implementation Plan (Rev 1.0).

2. Scope

This procedure applies to all organisations in R&M's supply chain, including:

- subcontractors, including labour-only and specialist subcontractors
- material suppliers, manufacturers and plant hire companies
- waste carriers and waste management sites
- designers and consultants
- any sub-subcontractors or suppliers engaged by R&M's supply chain on R&M projects

3. Environmental Risk Rating of Packages

At procurement stage, the project manager gives every package an environmental risk rating. The rating decides what R&M asks for at selection, what goes into the order and how closely the work is monitored.

Rating	Typical packages	Main environmental risks
High	Demolition and strip-out; groundworks, excavation and drainage; piling; concrete works; asbestos removal; waste removal; work near watercourses or protected habitats	Pollution of drains and watercourses, contaminated land, hazardous waste, dust and noise, harm to ecology, large volumes of waste
Medium	Frame and envelope, including MMC and timber frame; roofing; scaffolding; mechanical and electrical; external works and landscaping; plant hire with fuel	Materials sourcing, packaging and offcut waste, fuel and oil storage, noise, energy use
Low	Internal finishes, joinery, decoration, consultants, office suppliers	Material waste, packaging, travel

4. Requirements at Selection

In addition to the environmental questions in R&M's Pre-Qualification Questionnaire, R&M requires the following, in proportion to the risk rating:

Requirement	Low	Medium	High
Signed environmental policy (or commitment to follow R&M's)	✓	✓	✓
No environmental enforcement action or prosecution in the last 3 years (or evidence of corrective action)	✓	✓	✓
Documented environmental management arrangements (ISO 14001, or equivalent procedures)		✓	✓
Environmental risk assessment and method statement for the package (spill prevention, waste, dust, noise, drainage protection)		✓	✓
Evidence that supervisors and operatives have environmental training (e.g. SMSTS / SSSTS, SEATS, toolbox talks)		✓	✓
Waste carrier registration and receiving site permit (checked on the Environment Agency register)	Where removing waste	Where removing waste	✓
Environmental incident and complaint record for the last 3 years			✓
Emergency spill response arrangements and spill kits for their plant			✓
Relevant specialist licences (e.g. asbestos licence, CL:AIRE qualified person)			Where applicable

Material suppliers are also assessed on responsible sourcing. R&M requires FSC or PEFC certified timber, and prefers suppliers with BES 6001 (or equivalent) certification, recycled content, take-back schemes for packaging and surplus materials, and local manufacture.

Suppliers that cannot meet the requirements for the package's rating are not appointed, unless the Director of Operations approves specific additional controls and records them.

5. Requirements in the Order

Every subcontract and supply order includes environmental requirements, including:

- compliance with environmental law and with R&M's Environmental Management Policy, Implementation Plan and site rules
- compliance with the project's Construction Phase Plan, Site Waste Management Plan and any planning conditions (for example a CEMP)
- waste segregation on site, and waste removed only by registered carriers to permitted sites, with waste transfer notes provided to R&M
- fuels and chemicals stored in bunded containers or on drip trays, with suitable spill kits
- immediate reporting of any environmental incident, near miss or complaint to the R&M site manager
- attendance at R&M site inductions and environmental toolbox talks
- co-operation with R&M inspections and Spectre Safety audits, and provision of environmental records on request
- passing these same requirements down to any sub-subcontractor or supplier they engage on R&M work, and remaining responsible for their performance

6. Before Work Starts

At the pre-start meeting, the site manager and the subcontractor's supervisor agree the environmental controls for the package. The site manager:

- reviews and accepts the environmental parts of the RAMS; site-specific controls are required for Medium and High rated packages
- confirms waste arrangements, waste carrier registration and the receiving site
- checks spill kits and fuel storage for the subcontractor's plant
- briefs the site's environmental risks, protected areas, drainage layout and working hours
- records the agreed controls in the pre-start meeting minutes

7. Monitoring During the Works

Check	Frequency	Who
Daily site walk-round, including subcontractor housekeeping, waste segregation, drainage protection, fuel storage, dust and noise	Daily	Site manager
Weekly Site Environmental Inspection Checklist, recording subcontractor issues	Weekly	Site manager
Independent site audit, including subcontractor environmental compliance, waste transfer notes and training records	Monthly	Spectre Safety
Waste transfer notes and Disposal Off-Site Record checked against loads leaving site	Each load / monthly	Site manager
Delivery checks on materials, including FSC / PEFC certification on timber deliveries	Each delivery	Site manager

Check	Frequency	Who
Additional inspection during high-risk activities, such as concrete pours, excavation near drains, demolition or site clearance	Each activity	Site manager

Environmental breaches are dealt with in the same way as other non-compliance under the Sub-Contractor Selection and Monitoring Policy: immediate correction, a Non-Conformance Report or entry on the Corrective Action Log, a verbal or written warning, and removal from site for serious or repeated breaches. Any incident is investigated under the Environmental Implementation Plan.

8. Performance Review

- **Environmental scorecard:** each subcontractor's performance scorecard includes an environmental section (Appendix A), completed by the site manager at the end of each package, or quarterly on long packages.
- **Quarterly supply chain review:** environmental scores, incidents, complaints and audit findings are reviewed at the quarterly supply chain performance review chaired by the Procurement Manager and attended by the Director of Operations.
- **Outcomes:** good environmental performance counts towards preferred status. Poor performance leads to an improvement plan, enhanced monitoring, suspension or removal from the approved list, as set out in the Sub-Contractor Selection and Monitoring Policy.
- **Support:** R&M shares its environmental policy and toolbox talk material with its supply chain, and signposts subcontractors to free training through the Supply Chain Sustainability School.

9. Responsibilities

- **Thom McKenna (Chair & CEO):** approves this procedure and any decision to remove a supplier for environmental reasons.
- **Jon Scurr (Director of Operations):** oversees supply chain environmental performance on site, approves additional controls where a supplier does not fully meet requirements, and deals with serious breaches.
- **Louis Howard (Procurement Manager, Enabl):** applies the selection requirements, includes environmental requirements in orders, keeps environmental records on the approved list and chairs the quarterly supply chain review.
- **Project Managers:** set the environmental risk rating for each package.
- **Site Managers:** hold pre-start meetings, monitor subcontractors daily and weekly, check waste records and complete scorecards.
- **Spectre Safety:** audits supply chain environmental compliance as part of its monthly site audits.

10. Review

This procedure is reviewed annually as part of R&M's environmental management review, and after any significant supply chain environmental incident or change in legislation or client requirements.

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 - Subcontractor Environmental Performance Scorecard

Field	Details
Subcontractor	
Project / package	
Environmental risk rating	☐ Low ☐ Medium ☐ High
Period covered	
Completed by / date	

Criterion	Score (1-5)	Comments
Environmental RAMS: site-specific and followed		
Waste segregation and housekeeping		
Waste transfer notes provided and carriers compliant		
Drainage protection and pollution prevention		
Fuel and chemical storage; spill kits available		
Dust, noise and working hours controlled		
Materials care; surplus returned; certified timber		
Energy: plant switched off when idle		
Operatives inducted and attending toolbox talks		
Environmental incidents, near misses or complaints (number and response)		

Criterion	Score (1-5)	Comments
Response to audit findings and corrective actions		
Overall environmental score (average)		

Scoring: 5 = excellent, 4 = good, 3 = acceptable, 2 = below standard (improvement plan), 1 = unacceptable (suspension considered).