

Policy on Sustainability and Environmental Management

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Document purpose and scope

This document sets out the Sustainability and Environmental Management Policy of HMH Civils Limited and its subsidiary operating companies, collectively known as 'HMH'. It covers activities undertaken by the Group throughout all its office locations and operations UK wide.

This document will be reviewed for continued suitability, will be communicated within the HMH Group and, if appropriate, made available to interested parties. The review interval for this document is minimum 1 year.

Policy statement

We recognise that our environmental, social, and economic responsibilities are integral to the long-term success of our business. It is a core aim of HMH to have a positive impact on our staff, clients, suppliers, and the local communities and environments in which we work. To help achieve this aim, we will champion sustainability within all of our operations and client services and effectively promote sustainability in all of our policies, plans, and business management decisions. We will take all reasonable measures to minimise the environmental impacts of our operations and activities, including protecting land, air and water quality and preventing pollution, and will ensure our use of natural resources – water, energy, and mineral resources – is sustainable and environmentally responsible. We will work progressively to improve the sustainability of our business practices and will be fully accountable for the environmental impacts of our operations. We will engage effectively with our staff, clients, and suppliers to promote environmental sustainability and will proactively share what we have learned.

We will adopt a principles-based approach to business, incorporating [The Ten Principles of the UN Global Compact](#), and will actively promote the [UN Sustainable Development Goals](#) (SDGs) within our culture and our operations. We will monitor our contribution to the SDGs and communicate our progress in our annual business reporting.

We recognise that we are in a climate and ecological emergency and are committed to taking meaningful action to minimise our climate impacts. We will be a Net Zero carbon emissions business by 2030. We will take all reasonable measures to protect the environment through the delivery of our operations and client services and will seek opportunities to achieve environmental and social benefits.

We will adopt a circular economy model for our business and will use this model to inform our business operations and management. We will promote the principles of a circular economy in our services and in the goods and services we use. We will work with our suppliers to minimise the environmental impacts of the goods and services we purchase, including materials, equipment, and other physical assets, across their full life cycle including disposal. We will apply sustainability as a positive choice and prioritise suppliers who support our sustainability objectives.

We will comply with, and exceed where practical, all legislation, standards, statutory and other obligations, and best practices that are relevant to our activities and the jurisdictions in which we operate. We will seek to comply with client policies where required and reasonably possible to do so without conflicting with our own policies or other obligations. Where this is not possible, we will make clients and suppliers aware of our Sustainability and Environmental Management Policy and encourage them to follow policies and practices in alignment with our own.

We maintain and continually improve our Environmental Management System (EMS) so that, as a minimum, it satisfies the applicable requirements of the international standard ISO 14001:2015, is appropriate to the nature, scale and environmental impacts of our activities and services, and enhances our environmental performance. We are committed to fulfilling our compliance obligations and conduct our operations in accordance with the requirements of our EMS.

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Purpose

Our Sustainability and Environmental Management policy establishes our commitment to effectively incorporate the principles of sustainability in our practices, operations, and business planning. The policy promotes the four pillars of sustainability – human, social, environmental, and economic – which are interdependent and mutually reinforcing. Our policy, in conjunction with our [Procurement, Health and Safety, Equality, Diversity and Inclusion](#), and [Corporate Social Responsibility](#) policies, promotes continuous improvement in our operations, minimising our resource use and our environmental impacts, and supports our core aim to have a positive impact on our staff, client, suppliers, and the local communities and environments in which we work. We will encourage our staff to apply this policy in all of their actions across all of our operations and client services.

Responsibilities

The HMH Group Board is accountable for the effectiveness of the EMS, its integration into business processes and ensuring it achieves its intended outcomes. It is responsible for the content and implementation of this policy and will assist each Operating Company to apply the policy through appropriate procedures, guidance and monitoring.

Overall compliance with the requirements of this policy is the responsibility of each Operating Company within the Group. The Managing Director of each Operating Company will ensure their company's adherence to this policy. Operating Company Directors are responsible for taking measures to promote this policy and helping their staff to comply with its requirements.

Line managers are required to ensure that their staff understand this policy and any associated guidance.

The Head of Group IMS is responsible for ensuring our EMS conforms to the requirements of ISO 14001:2015 and for reporting on the performance of the EMS and the environmental performance of the HMH Group.

EMS representatives in each office are responsible for checking office procedures operate in accordance with our Sustainability and Environmental Management Policy, monitoring and reporting in relation to our environmental objectives, and raising awareness within their office of our EMS.

All staff are required to comply with our policy requirements and share responsibility for our performance in implementing it.

Implementation

We implement our Sustainability and Environmental Management Policy by following The Ten Principles of the UN Global Compact. The principles promote responsible and accountable business practices and encourage a culture of integrity that places people and the planet at the centre of our operations. Through implementation of these principles, we take action to support the UN SDGs and will report annually on the measures we have taken to demonstrate our progress against these commitments.

Meeting the challenges of sustainability requires shared responsibilities and we will work with our staff, clients, suppliers, and local communities to identify sustainable solutions. We consider that our core values of accountability and responsibility are key elements in addressing the sustainability challenge.

The HMH Group Board, together with the Operating Company Boards, establish sustainability objectives that reflect our business strategies and significant environmental impacts. We monitor and measure our performance against these objectives through our EMS throughout the year and communicate the results to all our staff and external parties. Our sustainability objectives are fully integrated within the financial planning of the Group companies and are embedded in our annual business planning processes.

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We implement our EMS within a process-based Integrated Management System (IMS) that also controls and documents our quality, health and safety, and information security management processes. Our IMS is a documented system with defined processes and procedures that enable us to provide services that consistently meet client and other applicable statutory and regulatory requirements. All IMS policies, procedures and documents are accessible by all staff via our intranet. We provide adequate and appropriate resources, including people, infrastructure and working environments, to establish, implement, maintain, and improve the IMS. We assess the continuing suitability, adequacy, and effectiveness of our IMS via regular management reviews.

Strategic risks and opportunities associated with internal and external issues that may affect the ability of the IMS to achieve its intended outcomes are addressed in our Risks and Opportunities Register. We maintain an Environmental Risk Register that identifies the environmental aspects and impacts we can control or influence within our activities and services. This considers the life cycle impacts of our actions and decisions and determines the significant environmental aspects to be taken into account within our EMS. We operate in line with the applicable requirements of ISO 55001:2014, the international standard relating to asset management.

We maintain a legal register that provides access to applicable legislation and records compliance with legal and other requirements relevant to our activities and environmental aspects.

Our Carbon and Resource Use Management Plan establishes our objective to become a Net Zero carbon emissions business. To achieve this ambition, we will embed the circular economy model within our business operations and management. We will work more efficiently, minimising our resource use and the environmental impacts of our resource use. We will engage our staff, clients, and suppliers on these subjects, to demonstrate our commitment to sustainability, show leadership within our industries, and manage our supply chain with accountability.

Through our services we support our clients to reduce their environmental impacts, natural resource use, and carbon emissions. Our diverse project portfolio means we can inform and influence a wide range of development projects. This provides a significant opportunity, and places an important obligation on us, to support our clients to develop projects that deliver sustainable development. We have achieved membership of the IEMA EIA Quality Mark scheme. This demonstrates our commitment to excellence in our EIA activities, ensuring they achieve independently verified good practice standards, promotes clear and transparent communication, and supports knowledge sharing across the EIA community.

Our EMS objectives and office and site management procedures seek to ensure that we operate in a manner that minimises our environmental impacts, protecting land, air and water quality and preventing pollution. We aim to minimise the waste we produce and ensure that all our waste is recycled, with the ambition of becoming a Zero Waste business. We recognise the influence our purchasing has in delivering this ambition, and the need to embed the circular economy model within all our procurement decision-making and effectively promote sustainable procurement that minimises waste and use of hazardous or polluting materials such as plastic.

We manage our energy use and purchasing responsibly and maximise energy efficiency wherever feasible. Where we have control of our office energy tariffs, we purchase our electricity from renewable sources. We aim to purchase all of our electricity from renewable sources at the earliest practicable time.

We actively encourage all staff and persons working on behalf of HMH to consider the environment, both during and outside of work. We communicate our Sustainability and Environmental Management Policy, significant environmental aspects, and information regarding our EMS to all staff and promote understanding of how their activities have an impact on the wider environment.

We check that all our staff, suppliers and persons performing tasks for HMH that have the potential to cause a significant environmental impact are competent, and we provide training and supervision where appropriate.

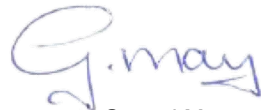
We maintain emergency preparedness and response procedures within our [Business Continuity Plan](#)

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to prevent and mitigate environmental impacts.

We conduct internal audits of our IMS in accordance with our planned audit schedule to ensure consistent conformity to requirements. Lessons learned are disseminated to all staff across the Group.

Signed on behalf of the Group Board of Directors

A handwritten signature in blue ink that reads "G. May".

Gerard May
Group Managing Director
09th January 2023
Revision 04