



South Staffordshire Plc

Environmental Policy

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Introduction

South Staffordshire Plc and its subsidiary companies (together "the Group" and each a "Group Company") maintain the highest standards of ethical behaviour in all of our business dealings. We are committed to conducting ourselves fairly, honestly and lawfully in all business dealings and relationships.

Purpose

The purpose of this policy is to state the Group's position on and to provide information and guidance on environmental matters. This policy:

- sets the minimum requirements and procedural steps that all Group Personnel must follow in order to comply with this policy. Each jurisdiction may impose additional, more onerous requirements to meet their local obligations but cannot reduce the requirements of this policy; and
- provides information and guidance to those working for the Group on how to recognise and manage bribery and corruption.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located ("Group Personnel"). It is the responsibility of Group Personnel to ensure that are acquainted with this policy and any subsequent updates.

In this policy, third party means any individual or organisation you come into contact with during the course of your work and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Our Vision, Mission and Values

Our commitment in terms of compliance with the Bribery Act 2010 and all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate is also supported by our Group Vision, Mission and Values. Our core values and the values driven behaviour that applies to the Group and to all of our employees. In this way, all the parties involved know what they can expect from the Group and conversely what the Group expects of them.

In common with all policies which drive our environmental engagement and commitments this policy statement is an expression of our corporate values, to be:

- Professional
- Trusted
- Impactful
- Community Focused

Policy

The Group takes its environmental responsibilities seriously. We aim to manage our operations in a way that is environmentally sustainable, economically feasible and socially responsible. We are committed to minimising our impact on the environment and managing the effects of a changing climate on our business and supply chain.



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We do this by embedding a culture that considers sustainability and environmental impact within business processes and recognising that every team member across the Group has a responsibility to consider the environment in our day-to-day operations.

Individual business procedures ensure that our operations meet the requirements of environmental legislation. 'Ways of working' exist to protect the environment, prevent pollution, and mitigate the Group's environmental impacts by considering a lifecycle perspective to all operations and products, embedding sustainability into all our activities and processes.

We aim, via targets set, to reduce carbon emissions, energy, packaging, and waste. We have clear objectives to ensure continuous improvements in environmental performance and management overseen by our ESG Management Group.

Commitments

- Monitor progress on environmental standards and objectives by adopting regular internal monitoring procedures.
- investigate incidents to reduce the chance of reoccurrence.
- use impact assessments to identify opportunities for improvement.
- encourage and evaluate feedback from all, on our environmental management.
- liaise assertively and honestly with regulators.
- review environmental trends and progress at the ESG Working Group; and
- review key environmental issues at ESG Management Group level at least every six months.

To manage our day-to-day environmental impact, we shall:

- comply fully with all applicable environmental legislation and regulation – striving to go beyond legal compliance.
- actively reduce our environmental impact, including in the areas of water, waste, energy, and carbon.
- track and reduce energy use and greenhouse gas emissions.
- minimise the impact of waste on the environment by promoting and facilitating the waste hierarchy (reduce, reuse, recycle) whilst managing waste in a responsible and compliant manner.
- Look to integrate environmental consideration into product design and/or provision of services (e.g., circularity and lower carbon transportation) – adopting lifecycle analysis principles.
- Minimising reliance on raw materials and consider recycled or renewable materials where feasible.
- manage the property portfolio by considering sustainable construction, refurbishment, and maintenance practices.
- engage with team members through the ESG Group's work to raise awareness of sustainability, communicating environmental targets to promote good practice and encourage collective commitment to reducing environmental impacts.

To continually improve how we manage environmental impact, we shall:

- monitor progress on environmental standards and objectives by adopting regular internal monitoring procedures.
- implement effective emergency response procedures, as/when required.
- investigate incidents to reduce the chance of reoccurrence.
- use impact assessments to identify opportunities for improvement.
- encourage and evaluate feedback from all, on our environmental management; liaise assertively and honestly with regulators and other interested stakeholders.
- regularly review key environmental performance at the ESG Management Group.



To ensure effective governance on our impact on the environment, we shall:

- establish and maintain effective environmental systems as part of our ISO accreditations to manage any operational impact on the environment.
- identify, manage, and respond to environmental risks and opportunities via our ISO frameworks.
- report environmental performance to the ESG Management Group at least every six months.
- nominate the Chief Commercial Officer as the person who champions environmental management at Executive Committee level.
- confirm that all levels of line management are responsible for day-to-day environmental management.
- transparently report on our environmental performance to all interested stakeholders.

We expect all our team members, in all our group of businesses, to engage fully with this policy and to share in our collective group wide vision of achieving high environmental standards and minimising our environmental impact.

We shall ensure that this policy is regularly reviewed to ensure it remains fit for purpose and continues to promote these high standards of environmental awareness.

Training

Mandatory training on this policy will form part of the induction process for all new employees. All existing employees, workers and temporary employees will receive mandatory training and regular, relevant updates on how to implement and adhere to this policy as appropriate. Board members will receive training on this policy as part of their induction programme.

Responsibility for this Policy

South Staffordshire Plc's Board of Directors has approved and issued this policy as part of its overall responsibility for ensuring that South Staffordshire Plc and each Group Company complies with its legal and ethical obligations, and that all those under its control comply with this policy.

Management, at all levels, are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All Group Personnel must read, understand, and comply with this policy.

Disciplinary and other Action

Violations of this policy may result in disciplinary action, which could result in dismissal for gross misconduct.

Any queries on the application or interpretation of this policy as it applies to Group Personnel should be discussed with the Human Resources Department prior to any action being taken. Please email: peopleteam@south-staffordshire.com

Management and Administration

This policy does not form part of an employee's contract of employment, and it may be amended at any time.

The General Counsel & Company Secretary will be responsible for the management of this policy and the Chief Executive Officer has final authority over this policy.

Questions regarding this policy should be directed to Group Legal using the following email address legalservices@south-staffordshire.com



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Group Legal Team has the responsibility for ensuring the maintenance, review and update of this policy. Suggested changes / amendments should be submitted via email to: legalservices@south-staffordshire.com. Any review, update or changes to this policy shall be carried out and approved in accordance with South Staffordshire Plc policy and procedure review process.

Document Details

Owner: Group Legal and authorised by the Chief Executive Officer
Approved By: Group Board
Signed By: Charley Maher, CEO

Signature:

Date of Approval: May 2024

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