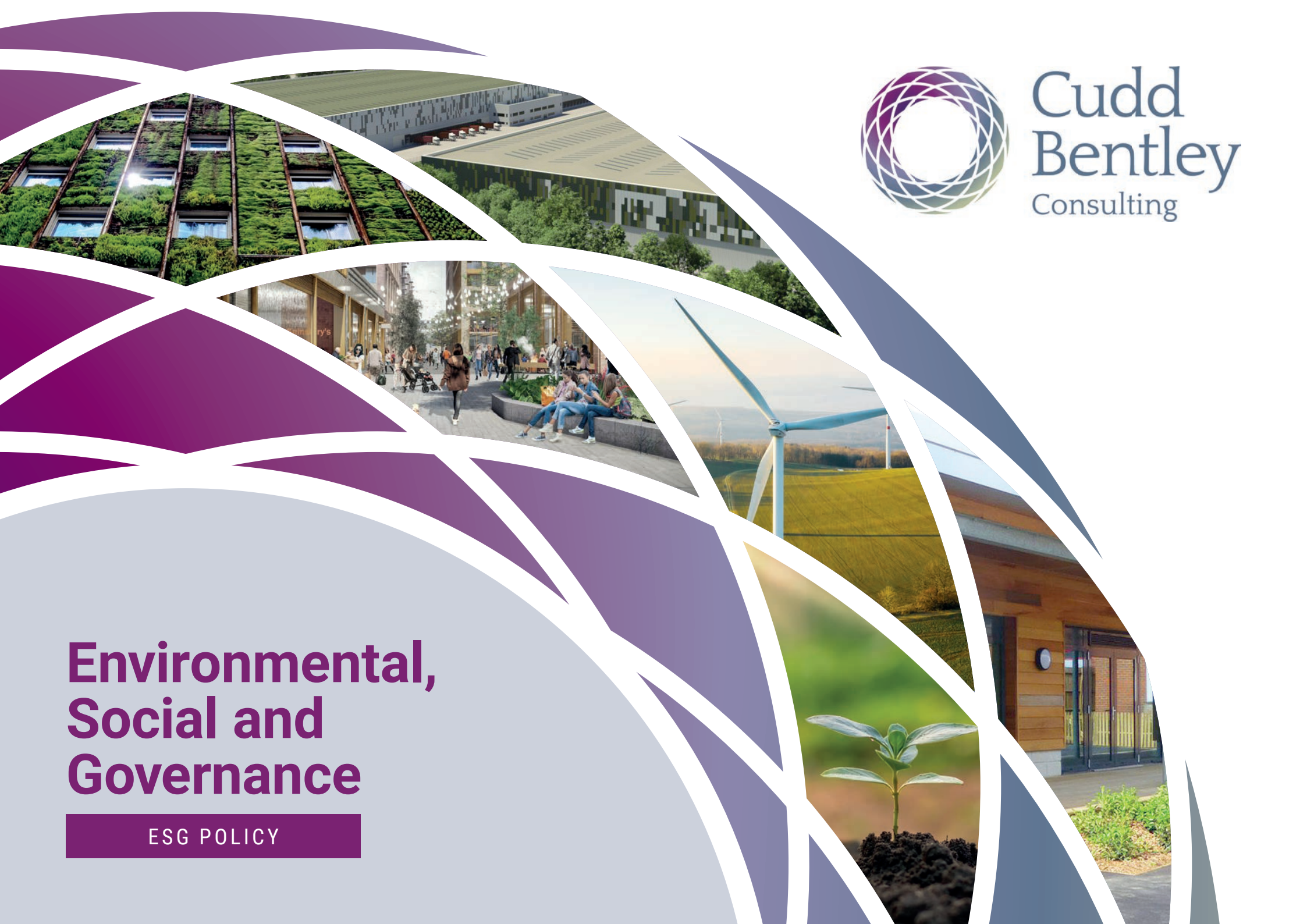




Cudd
Bentley
Consulting

Environmental, Social and Governance

ESG POLICY



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POLICY

1.0 Who we are?

The practice was founded in 1978 in the form of a partnership. In 1988 the Company became a wholly owned subsidiary of a major PLC Group retaining the senior management on long service agreements. In 2005 the practice was acquired by members of the senior management team thus ensuring that the standard of service, on which the reputation of the practice was founded, is maintained.

The practice operates out of three strategically located offices in **Sunninghill (Berkshire), Solihull (West Midlands) and London**. This allows the business to operate on projects throughout the UK.

Each office is capable of operating on a standalone basis to provide Mechanical, Electrical and Sustainability services to suit our Clients' requirements. Resources are allocated to suit the geographical location or to suit Client account requirements.

The practice has embraced the changes that have taken place in the Building Services Industry since the management buy out with the development of a first class sustainability resource and significant investment in BIM.

The development of the practice has been founded on well engineered practical design solutions undertaken within the programme and cost constraints set by our clients. Over 85% of our work is on a repeat business basis. The structure of the practice ensures both small and large projects can be effectively handled by specialist independent Design Teams, with a Director allocated to each account to ensure that the Client's requirements are effectively met.

The practice operates in a diverse range of buildings including Industrial/logistics, Commercial Offices, Shopping Centres, Retail, Leisure, Private Schools, Hotels, Mixed Use Developments and Residential Schemes. The quality of the schemes we have worked on is reflected by the 6 Gold Awards received from the BCO/BCSC during the last decade.

The practice is in a good financial position and has zero gearing after the completion of a management buy out in July 2005. If requested the practice is able to provide a financial reference issued by our bankers Messrs Lloyds TSB.



Sustainability Services

The Cudd Bentley Consulting (CBC) Sustainability Team consists of a variety of qualified Engineers and Environmental Consultants with a broad range of backgrounds including Mechanical Engineering, Building Services Engineering, Renewable Energy and Environmental Science. The CBC Sustainability Team are CIBSE Low Carbon Consultants, CIBSE Low Carbon Energy Assessors, Domestic Energy Assessors, BREEAM Assessors and Accredited Professionals. This broad range of knowledge and qualification allows the CBC Sustainability Team to produce sustainability documentation for planning submissions that are tailored to the individual requirements of the development and to ensure National and Local Policy compliance is demonstrated with clarity and any client specific sustainability aspirations are met.

The continual rise of global energy prices and the UK Government's commitments on Climate Change has resulted in revisions to the UK Building Regulations at

national level and changes to evolving local planning policies. Dealing with the sustainability issues associated with these requirements now forms an intrinsic part of Engineering Services in the built up environment.

This requires a holistic review of the sustainable solutions appropriate to a project at the preplanning stage and requires strategic decisions to be made that will fundamentally affect the future design of a development. The skills required to undertake this task, at this early stage, are a fusion of sustainability knowledge and engineering expertise.

The Cudd Bentley Sustainability team would, therefore, be closely integrated with the practice's Engineering Design team through all phases of the project to ensure that planning objectives are delivered via commercially and technical viable solutions. This would involve the following inputs as listed on the next Page:



Net Zero Carbon Reports - These would be produced to set a pathway which will demonstrate how the building can be net zero when in construction/ operational stage. A detailed SBEM modelling including TM54 analysis will be undertaken to ensure enough renewable energy is proposed on site to offset operational energy completely. Embodied carbon calculations using One Click LCA tool will be used to estimate the carbon emissions related to construction/ operation stage and list of offsetting strategy in line with UKGBC framework.

Energy/ Sustainability Reports - These would be produced to support a planning application and would detail a suitable energy strategy for the site. Conceptual elevation design would be analysed to ensure compliance with the current Building Regulations Part L.

BREEAM Assessments - These are undertaken by our BRE accredited Professionals (AP) covering retail/ commercial/industrial/other buildings/bespoke healthcare and new construction 2

LEED Assessments - The LEED certification process is undertaken by our own LEED Accredited Professionals. The certification is applied for all

building types, and we are able to undertake the LEED certification process on the following schemes: LEED Building Design and Construction (LEED BD+C), LEED Interior Design and Construction (LEED ID+C), Building Operations and Maintenance (LEED O+M), LEED Neighbourhood Development (LEED ND), LEED Homes, and LEED Cities and Communities.

Well Assessments - The WELL certification process is undertaken by our own WELL Accredited Professionals covering WELL Building Standard (Owner occupied & WELL Core), WELL Ratings (WELL Health Safety Rating & WELL Performance Rating) and WELL Community Standard. The standard emphasizes human health and comfort in building applications and aims to make buildings better for people.

Energy Performance Certificates; Levels 3, 4 and 5 - Our registered LCEA would produce EPC documentation for both the Commercial and Residential elements of the development.

3D Thermal Dynamic Modelling and Analysis - Qualified professionals undertake 3D modelling as necessary to mitigate the occurrence of excessive solar gains, to comply with current Building Regulations.

- **Air Conditioning Reports**
- **Energy Performance Certificate (EPC)**
- **Net Zero Carbon Reports**
- **Domestic Energy Assessors (DEA's)**
- **BREEAM Assessments**
- **Feasibility Reports**
- **Energy/Sustainability Reports**
- **Whole Life Carbon Reports**
- **Circular Economy Reports**
- **Part L Compliance and Recommendation Reports**
- **3D Modelling**
- **Daylight Modelling**

2.0 About this policy

ESG is about Environment, Social and Governance, in bringing them together under one banner to demonstrate the positive impact our business is having on the world. ESG is much like corporate social responsibility but on a vastly larger and more measurable scale.

This policy will inform our ESG efforts moving forward. This includes, but is not limited to reporting, disclosures (both material and non material), business practices, policies, procedures, investments, board activities, stakeholder engagement, and investor relations.

The purpose of this policy is to provide information about ESG (Social and Governance factors) and to encourage the business to understand ESG better.





3.0 Our ESG Commitment

We strive to build sustainable, equitable, healthy, and diverse communities through a combination of innovative business practices and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our company, collaborate with stakeholders and report progress.

This ESG Policy sets out our approach to sustainability matters. At the heart of the Policy is a corporate culture that has sustainability at the core of all our business operations and values.

4.0 Our Statement on Climate Change and the Environment Engineering

We are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world. Our sustainability program is committed to environmentally sustainable initiatives that deliver near term efficiency, value, and health for our business, our people, and the wider community.

We encourage our staff/customers to reduce their impact on the environment by recommending the use of more sustainable materials.

- a) We purchase organic (and also fair trade) products (tea, coffee, etc.) where not more than 20% more expensive than equivalent other products
- b) purchase low impact cleaning fluids and other chemicals
- c) encourage staff not to purchase over packaged products, including bottled water, lunches, etc;
- d) ensure it does not purchase unneeded electronic or other equipment and to dispose of all such equipment responsibly, ideally by passing it to another organisation or individual that can use it, for example in a developing country

- e) recycle everyday waste as much as practically possible.

We minimise the print related impacts by distributing materials electronically (including on CD-Roms, USB drives, etc), adding a warning to company email signatures.

We seek to comply with current environmental legislation and work to minimise the impact of our activities on the environment. We constantly review their Green Policy. The objectives of the review is to provide staff, clients and contractors with whom we have business dealings, with a clear statement of intent. In all cases due regard is made to ensure that we comply with all appropriate current legislation, codes of practice, government directives and regulations. The contents and philosophy of the Green Policy of the Practice is discussed with the client prior to the adoption of any of the aspects of the Policy.



1 Fruit tree for every basket

Computers, printers, kitchen equipment and other devices require energy to run, and in the winter heating is required. This energy use causes direct and indirect environmental impacts, through CO2 emissions and the extraction and transportation of fossil fuels

For reducing environmental impacts of energy use we:

- a) Turn off the printer and other equipment each evening and at other times when not in use;
- b) Purchase electrical equipment which has high energy efficiency ratings;
- c) Turn heating off when not needed;
- d) Turn off lights when not needed and use low energy light fittings where possible;
- e) Use an energy provider that is investing in renewable energy.

We support tree planting campaign to combat deforestation and offset CO 2 emissions by purchasing fruit basket. In collaboration with the UK charity Ripple Africa and Fruitful Office, 1 fruit tree is planted in Malawi for every basket/box delivered weekly to our offices. We target to plant a 100 trees per year until 2030 scaling up to 200 trees per year by 2050.

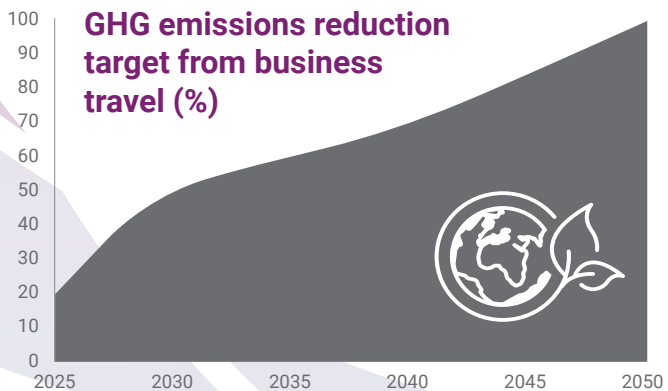
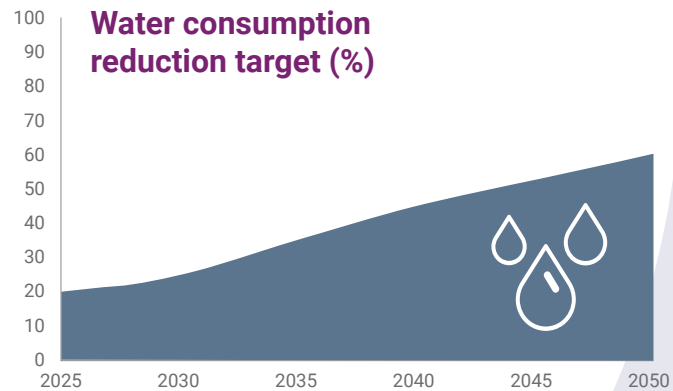
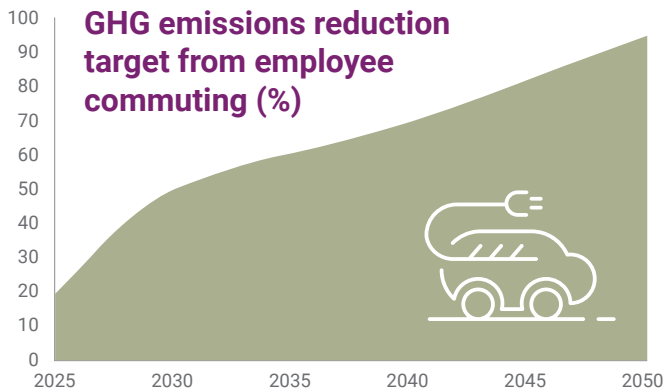
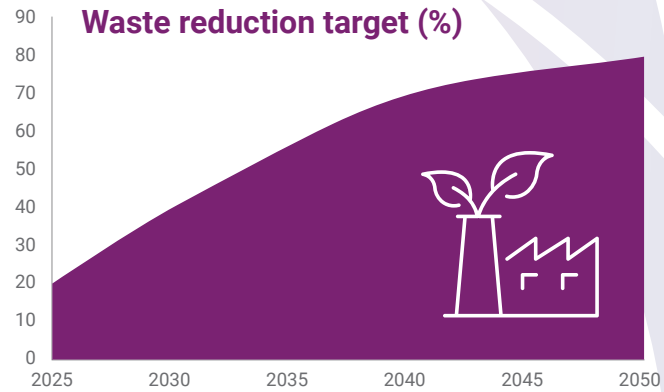
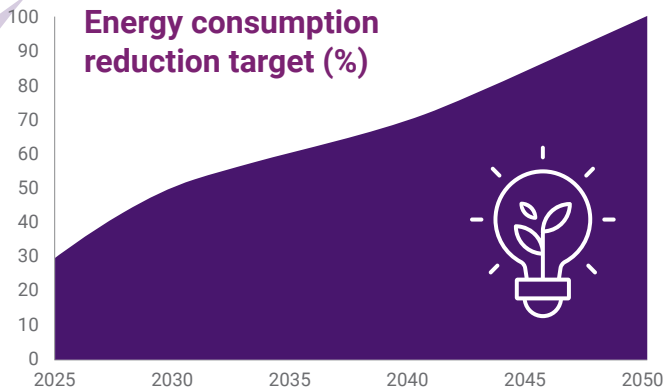
25 TREES PLANTED SO FAR*



* Figure accurate as of March 2023

Carbon Reduction Activities-Topic	Description	Action	Target
Electricity	Reduce energy consumption	<ul style="list-style-type: none"> • Purchase electrical equipment which has high energy efficiency ratings • Flexible/agile working policies reducing office utilization • Energy efficient systems • Use an energy provider that is investing in renewable energy • Use regulated and unregulated loads to evaluate operational energy use intensity following PHPP protocol • Turn off the printer and other equipment each evening and at other times when not in use • Turn heating off when not needed • Turn off lights when not needed and use low energy light fittings where possible 	<p>70% reduction by 2030</p> <p>100% reduction by 2050</p>
Employee Commuting	Reduce reliance on fossil fuel cars	<ul style="list-style-type: none"> • Installation of EV charging points in Ascot Office • No car parking in London Office • Reduction in the number car parking spaces available in other offices 	<p>50% reduction in GHG emissions from employee commuting by 2030</p> <p>95% reduction by 2050</p>
Business Travel	Reduce required business travel	<ul style="list-style-type: none"> • Use alternative software programs for the meeting • Use alternative transportation systems for in-person meetings 	<p>50% reduction in GHG emissions from business travel by 2030</p> <p>100% reduction by 2050</p>
Water	Reduce water consumption	<ul style="list-style-type: none"> • The company offers working from home policy. Since the employees work from home, they can improve the water efficiency • Using water efficient fixtures and equipment • Employee training on water efficiency 	<p>25% reduction in water consumption and GHG emissions from water usage by 2030.</p> <p>60% reduction by 2050</p>

Carbon Reduction Activities-Topic	Description	Action	Target
Waste & Purchasing	<p>Waste minimization</p> <p>Increasing waste diversion rates</p> <p>Sustainable purchasing</p>	<ul style="list-style-type: none"> • Employee training on waste minimization • Recycle everyday waste as much as practically possible • Storage space for organic waste provided in compliance with HQM requirements • Purchase organic (and also fair trade) products (tea, coffee, etc.) where not more than 20% more expensive than equivalent other products. • Purchase low impact cleaning fluids and other chemicals • Encourage staff not to purchase over packaged products, including bottled water, lunches, etc.; • Ensure it does not purchase unneeded electronic or other equipment and to dispose of all such equipment responsibly, ideally by passing it to another organisation or individual that can use it, for example in a developing country 	<p>40% reduction of waste to landfill by 2030</p> <p>80% reduction by 2050</p>
Embodied Carbon	<p>Reducing embodied carbon through collaboration with our supply chain.</p>	<ul style="list-style-type: none"> • Review existing supply chain and incorporate embodied carbon requirements into supplier approval process. • Measure and reduce whole life carbon on new developments/projects. 	
Corporate Operations	<p>Employee training</p>	<ul style="list-style-type: none"> • Employee training on Climate Change, sustainability, sustainable design process. 	<p>Yearly training; CPDs</p>
Carbon Offsetting	<p>Reduction or removal of emissions of carbon dioxide in order to compensate for emissions made elsewhere.</p>	<ul style="list-style-type: none"> • Determine carbon footprint of the company and support projects that reduce carbon emissions. 	



5.0 Our Statement on Social Responsibility

Our focus is to deepen relationships with our key stakeholders by investing in our employees and partnering with our customers, communities, investors and suppliers.

We are committed to engage with our employees to provide a challenging, dynamic, inclusive and diverse work environment that supports their professional development, as well as promoting a good work life balance that prioritises their overall health and wellness.

Investors in People offers a business improvement tool designed to help businesses develop performance through their people. It provides tailored assessments designed to support organisations in planning, implementing and evaluating effective strategies and is relevant for organisations of all sizes and sectors. The **Investors in People Standard Award** demonstrates how the Company is committed to its staff as well as raising business performance to an even higher level. CBC will now work towards a Bronze Award in their next assessment in 3 years' time.

Fruitful Office delivers basket/box of fresh fruits weekly to our offices. Supporting the health of our employees is vital for us, and something as simple as having fruit on hand can help with this. A well-balanced diet is the lynchpin of overall health, and by providing fresh fruit we hope to offer a healthy alternative to a typical snack that people tend to reach for.

Cudd Bentley proudly sponsors Binfield Football club to encourage young players in the community to engage in healthy, active and mindful activities.

**INVESTORS[®]
IN PEOPLE**

"We are very proud of this achievement and aim to work towards the next goals for Investors in People. We believe strongly in investing in our staff as well as the business and I thank the team for making Cudd Bentley Consulting the organisation it is today."

Sushil Pathak, Director



Our consultants volunteer with local programs with the aim to **boosting young people's motivation, attainment and future prospects by connecting volunteers from the world of work with schools.** Inspiring the Future enables schools to connect with inspirational volunteers from the world of work quickly and easily, in school or virtually, revolutionising the way in which young people get insights into exciting and unique careers and inspiring them to be ambitious.

We aim to continue to act responsibly and work with our community stakeholders. Our target is to;

- Continue to liaise with charities and companies to benefit the society
- Support local communities through support, e.g. supporting locally and independently owned businesses
- Actively participate in two charity events each year
- Advise clients on sustainable measures in their designs and projects.



We involve ourselves actively with charities to raise money including events such as the Paragon Mudathon 2022 where two teams from Cudd Bentley Consulting participated in an all day event.





6.0 Our Statement on Ethical Governance

Our focus is to promote strong oversight, transparency and risk management at all levels of our organisation, ensuring the resilience and long term preservation of value for our business.

We will maintain strong corporate governance practises through exemplary board stewardship, management accountability, and proactive risk management.

We cultivate strong stakeholder relationships through transparency, open communications, and responding to stakeholder input.

Our **Ethical Governance** policy includes internal processes of reporting and accounting, to ensure that we comply with all appropriate current legislation, codes of practice, government directives and regulations and surround ideas of:

- **Board Diversity and equal opportunity**
- **Board Independence**
- **Incentivised Pay**
- **Collective Bargaining**
- **Supplier Code of Conduct**
- **Ethics and Anti-corruption Policy**
- **Data Privacy**
- **Tax Transparency**
- **Sustainability/ESG reporting**
- **Other Framework Disclosure Practices**
- **External Validation Assurances**

7.0 Our Business and ESG

ENVIRONMENTAL

ESG is about assessing that net positive impact in the world, and taking concerted, defined and measurable action to improve it. Our value rests in our employees, our communities, and the wider world. Therefore, ESG forms a fundamental part of how our business lives our values in the real world.

The drive to assess a broader range of factors in a holistic manner, from environmental and climate change considerations to the social issues and how we invest in our people, to the structure of our business and always reaching for better governance, means we can tell our story better. We welcome opportunities to highlight the positive impact we have on the world.

As a business, we also have a duty to our people, our customers, and the wider world. ESG gives us an opportunity to bring those impacts together. We value investing in our people as we value protecting our environment and being a good corporate citizen.



SOCIAL & GOVERNANCE



Cudd Bentley

Consulting

Cudd Bentley Consulting Ltd
Ashurst Manor, Church Lane
Sunninghill
Ascot, Berkshire
SL5 7DD
T: 01344 628821

Cudd Bentley Consulting Ltd
Suite 1, Regus, Central Boulevard
Blythe Valley Business Park
Solihull, West Midlands
B90 8AG
T: 0203 393 6446

Cudd Bentley Consulting Ltd
12 Devonshire Street
London
W1G 7AB
T: 0121 711 4343

www.cuddbentley.co.uk

