


Environmental and Sustainability Policy

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 1 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Contents

SECTION 1: Environmental and Sustainability Policy Statement

SECTION 2: Resources, Roles, Responsibility and Authority

Structure Responsibilities

SECTION 3: Arrangements

Section 1: Environmental and Sustainability Policy Statement

It is the policy of Kingfisher Construction Services Ltd to:

- Minimise the extent of environmental impacts of the operations within the Company’s activities and the promotion of sustainability principles.
- Liaise with our clients on potential environmental and sustainability issues and work with them to address concerns, in so far as project constraints permit.
- Strive to minimise any emissions or effluents that may cause environmental damage.
- Conserve energy through minimising consumption and maximising efficiency.
- Minimise the use of materials that may be harmful to the environment.
- Promote efficient purchasing which will both minimise waste and allow materials to be recycled where appropriate.
- Monitor environmental performance, undertake regular reviews of the policy (reviewed at least every 12 months) and make improvements, where possible.
- To provide training for staff on environmental and sustainability awareness

Signed:  **Date: 2nd January 2024**

P. Holland

Director Responsible for Health and Safety and Managing Director

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 2 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Section 2: Resources, Roles, Responsibility and Authority



Responsibilities:

All persons are collectively responsible for environmental and sustainability aspects in all activities of the company. The Director responsible is responsible for approving the Environmental and Sustainability Policy and Procedures. As a Principal Contractor in the Construction Industry Kingfisher Construction Services Ltd is committed to developments that meet the needs of the present generation without compromising the ability of future generations to meet their own needs.


Director Responsible for Environmental and Sustainability Matters

The Director with overall responsibility for Environmental and Sustainability matters is Phil Holland who will ensure that the Environmental and Sustainability Policy is implemented, reviewed and updated at regular intervals and promoted to all members of staff, taking into consideration their views where applicable.

He will ensure that:

- Adequate funds are available for environmental and Sustainability training, advice, equipment and literature as required.

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 3 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- Training needs for environmental and sustainability purposes are regularly assessed and the necessary training implemented.
- Environmental incident reporting procedures are established and administered in conjunction with the Environmental Manager.
- Keep up to date with any changes in the statutory or other requirements and ensure that the policy is updated accordingly.
- All staff involved in supervision work are aware of their responsibilities and are sufficiently trained.
- Lead by and set a personal example to all other employees with regards to environmental and sustainability matters.


Directors

- Prepare and keep up to date a Statement of the Company’s Policy for Environmental and sustainability matters and ensure that it is brought to the attention of all employees.
- Prepare instructions for the organisation and methods for carrying out the Company Policy, to make sure each person is aware of their responsibilities and the means by which they can carry them out.
- Administer the Policy throughout the Company by appointing an individual director responsible.
- Understand the statutory and other requirements affecting the Company’s activities.
- Ensure that appropriate training is given to all employees as necessary, that records are maintained and the training needs of individuals are regularly reviewed against those of job requirements.
- Insist that sound working practices are observed as laid down by codes of practice and that work is planned, aspects identified and methods of working comply with statutory and other requirements.
- Reprimand any employee failing to discharge satisfactorily their responsibilities for environmental matters.
- Encourage the distribution of environmental literature throughout the Company.
- Arrange for funds and facilities to be available to meet the requirements of the Company Environmental Policy.
- Set a personal example to all employees in respect of their conduct and attitude towards environmental matters.

Health, Safety and Environmental Manager (Management Representative)

- To provide and source where necessary specialist environmental and sustainability advice on all aspects of the Company activities.
- To formally advise the Company of all new legislation and any changes to current legislation and offer advice and assistance on the implementation of the same.

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 4 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- To advise and assist the Directors in keeping the environmental and sustainability policy under review and to advise on changes that may be required to the Policy as appropriate or necessary.
- To take control, where necessary, of any internal investigation into any incident, prepare a report and make recommendations with regard to any remedial action required to prevent a reoccurrence.
- To liaise with the enforcing authorities on environmental matters.
- To recommend and monitor environmental and sustainability training requirements and to arrange, upon request, such training.
- Assist with the identification of environmental and sustainability aspects during site planning and visits.
- Liaise with the Directors on all environmental and sustainability matters.


Contracts Managers

- Understand the Company Environmental and Sustainability Policy and ensure that it is readily available on each site.
- Ensure that works under their control will not have a significant impact on the environment.
- Ensure that all fuels, chemicals and substances are stored in a manner that will prevent pollution from being caused.
- Ensure that all mobile plant or generators are turned off when not in use to prevent unnecessary use of fuel and reduce the emissions that are given off.
- Ensure that the office electrics are turned off when not in use.
- Liaise with other parties that may be affected by the work activities ie Clients, members of the public and neighbours to the site.
- Ensure that work is carried out in a manner that will not intentionally cause a nuisance to other persons that may work or live in the surrounding area.
- Work in accordance with the requirements of any environmentally related surveys that have been carried out.
- Ensure that all waste is contained within the site boundary and contained within suitable receptacles.
- Provide segregation of waste products where the quantities and provision of space allow for this to take place.

Site Managers/Supervisors

- To establish and organise operations under their control to ensure that work is carried out in a manner that is not damaging to the environment or is likely to cause a nuisance to the public or others persons who may be affected.

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 5 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- To be aware of and observe the requirements of the Company Environmental and Sustainability Policy, relevant statutory requirements, Approved Codes of Practice, Guidance Notes and environmental procedures appropriate to the operations under their control, seeking guidance and assistance from senior management and Environmental Manager as necessary.
- Carry out regular inspections, or as required by regulations, of operations under their control with particular reference to environmental procedures. Keep records of each inspection as necessary and arrange for any remedial or improvement work to be carried out without delay.
- To ensure that at places of work under their control, employees, contractors and others authorized to be at that place, or in connection with it, receive adequate working instructions, in particular to ensure arrangements for prevention of pollution and nuisance.
- Implement and maintain arrangements with contractors and other employers to ensure that they and their employees observe adequate environmental and sustainability procedures and statutory regulations and to review any confusion concerning areas of responsibility. Liaise with clients or their representatives to ensure that the environment is not adversely affected by the works.
- To ensure that fixed and mobile plant and equipment are in a good condition and that any leaks are corrected immediately.
- To ensure that suitable procedures and arrangements are in place in the event of any spillage occurring.
- Report all incidents involving adverse effects on the environment to the Contracts Manager as soon as possible after the occurrence. Assist in establishing the cause of all such incidents and thereafter carry out improvements to prevent reoccurrence and instruct employees and others accordingly.
- Accompany Environment Agency Inspectors on site visits and act on their recommendations. In the case of the Inspector issuing a formal notice for improvement, contact the Contracts Manager and director responsible for environmental matters.
- Co-operate with the Environmental Manager and act upon their reasonable recommendations.
- Encourage the observance of environmental procedures by personal example and ensure that arrangements for the effective control of environmental issues are in place.
- Implement changes to working practices, where necessary, to ensure effective environmental working and maintenance of standards.
- Ensure that adequate waste segregation is provided and that all waste is collected in suitable receptacles and controlled within the site boundary.

Plant Operators

- Inspect their machine and equipment daily and ensure that all leaks or defects are reported to the Site Manager.
- Operate plant in a manner that avoids contact with any substances or chemicals that are being stored on the site.

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 6 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- Ensure that all refuelling is carried out in a manner that avoids spills.
- Turn off plant and equipment when it is not in use.
- Work in accordance with any specific site instructions ie restricted working hours etc.
- Report any failings in systems of work to the Site Manager.
- Co-operate with the Company in meeting the environmental policy objectives and working procedures.
- Implement any dust suppression control measures that may be required.
- Ensure all noise reducing equipment is fitted where applicable.
- Carry out duties of a plant operator following the training you receive.


Site Operatives and Employees

- Develop a personal concern for the environment and co-operate with others in the provision of effective working conditions and the observance of the requirements of the environmental working procedures and the Environmental and Sustainability Policy.
- Ensure that no chemicals or substances are stored on exposed ground that may lead to pollution being caused.
- Report all environmental incidents and near-misses to the Site Manager.
- Carry out work activities in accordance with the instructions given, the company environmental policy and procedures that are in place.
- Do not flush any substances down the drain unless they are instructed to do so by a senior person who has confirmed that this is safe to do so.
- Ensure that all relevant measures are in place to prevent unnecessary nuisance to members of the public or other personnel that may be affected.
- Not intentionally interfere with any natural habitat unless under specific instruction by the Site Manager.
- Ensure that all waste is placed in the relevant receptacle and segregated as required.
- Turn off all equipment when not in use.
- Take an active part in promoting the Environmental Policy and systems of work.

Office Based Employees

- Segregate waste into the relevant receptacles that are provided within the offices.
- Do not flush any substances to drain unless they are sure that it will not cause pollution.
- Turn off all lights and equipment if they are the last out of the office or the equipment is not being used.
- Report any environmental incidents to the Environmental Manager.
- Work in accordance with the Company Environmental and Sustainability Policy at all times.

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 7 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Section 3: Arrangements

Sustainable development is the kind of development that meets the need of the present generation without compromising the ability of the future generations to meet their own needs. The main goal is to integrate the three most important pillars of sustainability that contribute to the achievement of sustainable development. These are;

Environmental

Seeking to minimise any negative environmental impacts of goods and services purchased across their life cycle from raw material extraction to end of life.

Social

Managing and monitoring supply chains to ensure that fair contract prices and terms are applied and that ethical, human rights and employment standards are always met.

Economic

The economic principle relates not only to obtaining value for money from our contracts across the whole life of the product or service but also ensuring, as far as is possible under relevant procurement law, that local businesses, particularly SMEs can benefit from our procurement processes.

Through tackling all three principles of sustainable procurement in the procurement process, we aim to embed these so that they eventually become an integral part of all relevant contracts.


Waste

Kingfisher will consider and implement the waste management hierarchy.

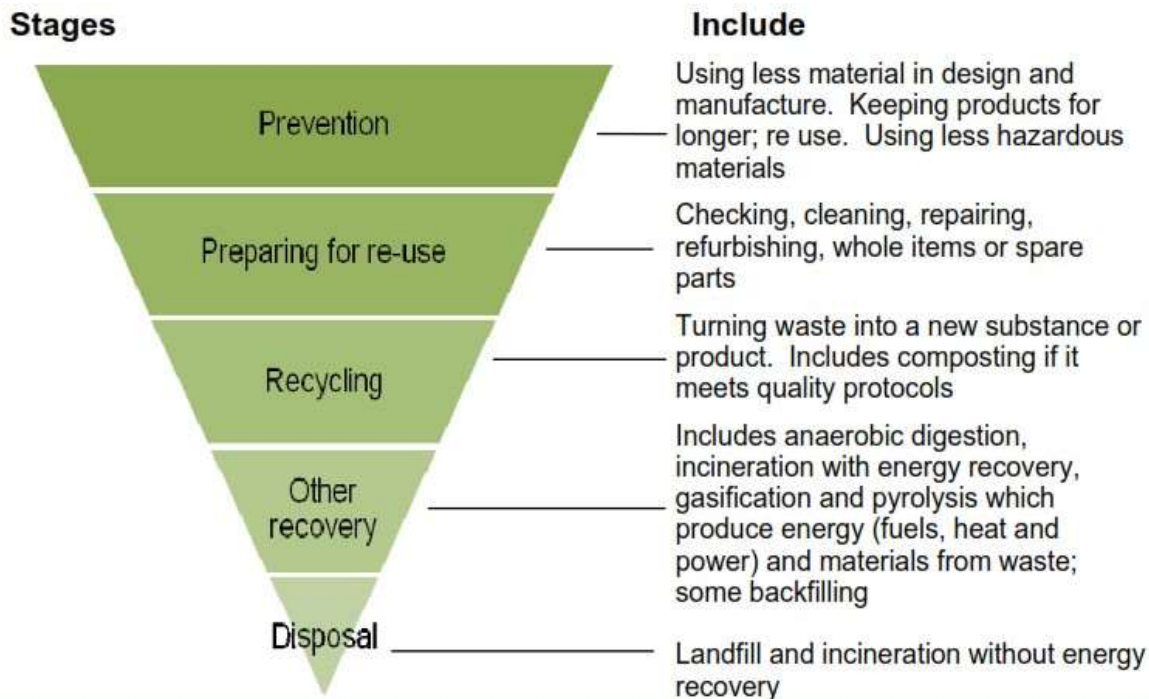
The waste hierarchy requires anyone managing waste to consider firstly prevention, preparing for reuse and recycling followed by other methods of recovery, for example energy recovery and, lastly, disposal.

Prevention, preparing for reuse and recycling should be given priority.

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 8 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Disposing of waste means throwing away potentially valuable resources since the raw materials and energy used in making the items are lost. See below the waste hierarchy template from gov.uk that defines optimum waste management choices.




Recycling has 1/10th of the carbon footprint of landfilling waste and can also generate cost savings.

If waste production cannot be avoided, the segregation of waste streams is paramount to allow effective recovery and recycling treatments.

At KCS we are committed to the following:

- Using the waste hierarchy at all times
- Aiming for 'zero landfill' with the help of our dedicated waste broker.
- Using local waste management solutions when possible
- Monitoring, reporting and setting targets for our management of waste

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 9 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- Minimising the creation of waste where possible
- Ensuring we have robust systems for recycling wherever possible


At KCS we have:

- Embedded sustainability principles and environmental considerations in the selection criteria and specifications of our waste management contracts
- Promoted and implemented mandatory Environmental Awareness Courses
- Segregated and recycled batteries, electrical and electronic items and printer cartridges
- All confidential waste is shredded and disposed of in local paper only skips / bins
- Put in place processes for general and other waste such as non-confidential office or food waste. These are to be segregated and placed into the relevant bins, dependent on whether recycling or non-recycling
- Requested that our supply chain submit their Environmental Policies within the Kingfisher Pre Qualification Questionnaire

At KCS, we will:

- Consider waste prevention and minimisation measures
- Consider the use of hand dryers over paper towels where appropriate to further reduce single serving disposable products and waste.
- Not procure plastic single serving cups for use in our offices or sites. Re-usable mugs/cups will be used and promoted to reduce single serving plastics and associated waste
- Consider the whole-life cycle of a product, including its final disposal, in our decision-making process, when choosing disposable products over reusable alternatives

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 10 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Energy:

Building/office energy use contributes to a considerable percentage of our carbon footprint and offers many opportunities for carbon savings and efficiency.

Measures can be taken on both demand and supply. Energy prices are set to rise well above inflation for years to come so there is a strong business case to invest in energy efficiency measures.

Demand led measures

This means reducing consumption by addressing energy wastage or using more energy efficient technology. These measures can tackle the energy used for space and hot water heating, ventilation, air-conditioning, lighting and powering equipment.

In practice, this can mean improving building insulation, using efficient lighting (such as LED) or optimising controls on heating systems.

Supply led measures

Another way to reduce carbon emissions is to use cleaner energy sources. For instance, natural gas has a much lower carbon footprint per kWh when compared to electricity or other fossil fuels.


Combined Heat & Power (CHP) takes advantage of this by producing electricity while using the heat losses for heating, a process 30% more efficient than using grid electricity.

Finally, renewable energy sources, such as wind, solar and anaerobic digestion, have extremely low carbon emissions.

At KCS we are committed to the following:

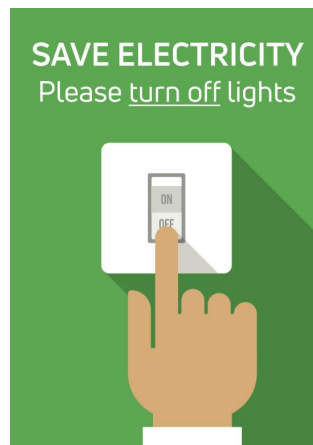
- Maximising the efficiency of our operations to ensure that our energy consumption is minimised
- Regularly reviewing the potential options for ensuring that we are supplied by cleaner and more sustainable forms of energy
- Monitoring energy use and implementing energy/carbon saving targets to improve performance
- Promoting responsible energy use through staff awareness and training
- Implementing energy efficiency measures into the design of building refurbishments and new buildings developments

ANY PAPER COPY OF THIS DOCUMENT IS UNCONTROLLED


Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 11 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

At KCS, we have already acted upon the following initiatives:

- Engaged with our staff to encourage energy saving behaviors through training
- Replaced traditional lighting for energy efficient LED versions in a number of our rooms
- Ensured that boilers, have service plans commensurate with the recommended guidance
- Considered the use of alternative fuels
- Ensured that all roof spaces are appropriately lagged and considered utilising suitable roof space for the installation of solar panels to generate onsite energy



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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 12 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Biodiversity and water



Biodiversity is all the different kinds of life you'll find in one area—the variety of animals, plants, fungi, and even microorganisms like bacteria that make up our natural world. Each of these species and organisms work together in ecosystems, like an intricate web, to maintain balance and support life. Biodiversity supports everything in nature that we need to survive: food, clean water, medicine, and shelter.


Water, as a resource, is essential for life. It is vital to our way of living, essential for agricultural production as well as in maintaining the natural ecosystems upon which we, and all life, depend.

The combination of a decreasing rainfall, an increasing population and an increasing commercial demand is placing pressure upon this vital resource.

At KCS we are committed to the following:

- Ensuring efficient use of water by measuring and monitoring its usage
- Incorporating water efficiency into the design of building refurbishments with our design partners
- Ensuring that there is a quick operational response to leaks
- Minimising the ecological impact of any development on the site and supporting the opportunities for the improvement of local biodiversity
- Minimising any construction related impact to biodiversity and preserving it where possible

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 13 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- Installing an Automated Meter Reading (AMR) on our main water meters to capture detailed consumption data and allow active monitoring
- Utilising water efficient technology such as automatic taps when possible
- Phasing out bottle fed water coolers for mains fed water coolers when possible
- Raising awareness of staff to the environmental and financial impacts of water use
- Encouraging staff not to waste water and turn taps off when not in use

Procurement and resources

KCS procures a wide range of suppliers and materials, all supplies should be from nationwide wholesalers and builders merchants that work in accordance with an upto date environmental policy.


What is sustainable procurement?

Sustainable procurement can be defined as “a process whereby companys meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life cost basis in terms of generating benefits not only to the company, but also to society and the economy, whilst minimising damage to the environment.”

Sustainable procurement is not limited to environmental considerations alone (e.g., carbon, waste and water). It also covers social and economic impacts from procurement actions such as encouraging increased participation from small and medium sized enterprises (SMEs) in procurements.

There is a general misconception that sustainability and value for money are in conflict. On the contrary, sustainability is about achieving value for money whilst realising environmental, social and economic objectives and the two are rarely in conflict when the whole life cycle is considered.

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 14 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Achieving sustainable procurement

KCS is committed to achieving value for money and delivering economic, environmental and social benefits through sustainable procurement activities. Our ambition is to ensure that sustainable procurement is being consistently undertaken in practice across the company. Through encouraging staff, suppliers and contractors to follow more sustainable procurement practices, this can be achieved.

As part of an improved procurement process that questions the need to spend, cuts out waste and seeks innovative solutions, procurement will reduce rather than add to company spending costs in both the short and long term.

Our sustainable procurement objectives

Collaborating with stakeholders and suppliers, where relevant KCS

will:

- Reduce carbon within contracts, reduce energy usage, fuel usage and waste
- Look to source materials with a lower embodied energy where possible
- Improve supply chain management including working with SMEs, the voluntary sector and local suppliers
- Ensure that recruitment, education and training are included in contracts

Enabling sustainable travel and logistics


The company is committed to supporting the improvement of local congestion and pollution concerns as well as supporting our staff, clients and community's health and wellbeing.

Modes of transport and travel have a very wide range of different carbon footprints. Travel and transport encompass a range of activities from staff commuting to work, business travel, the transport of goods required for the company to function.

At KCS we are committed to the following:

- Encouraging staff, clients and visitors to walk, cycle, car share or use public transport whenever possible
- Providing appropriate bicycle storage facilities to encourage staff to adopt healthy modes of transportation

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 15 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- Minimising travel through the van sharing in locations that are accessible via other van drivers without the need to increase journey travel time and the carbon footprint

At KCS :

- Consideration of the Cycle to Work scheme, encouraging staff to commute to work by bike, where possible.

At KCS:


- Actively encourage our staff to adopt more sustainable transport modes for commuting to work, such as walking, cycling or using public transport
- Make the most of technology (such as audio, video and web conferencing) to minimise the need for business travel
- Work with suppliers to optimise the logistics of shipping goods
- Explore the feasibility of purchasing/leasing low carbon practice vehicle technologies such as electric cars or vans
- Encourage suppliers to implement reverse logistics techniques where possible.

Managing carbon and greenhouse gases

Greenhouse gases (GHG) produced by human activities have caused an overall warming influence on the Earth’s climate. The largest contributor to warming has been carbon dioxide.



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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 16 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

As a socially responsible Company, KCS recognises the need to reduce carbon emissions and to contribute to the national effort to tackle climate change.

KCS is committed to the following:

Set targets in line with the Climate Change Act 2008 and KCS Carbon Reduction Strategy for the complete carbon footprint

- Work to influence staff, visitors and clients in reducing their individual carbon footprints through behaviour change campaigns
- Set targets in line with the Climate Change Act 2008 and KCS Carbon Reduction Strategy for the complete carbon footprint
- Work to influence staff, visitors and clients in reducing their individual carbon footprints through behaviour change campaigns


A single tonne of carbon (CO₂e) is equivalent to the following:



Structure of a Green Plan

Company vision – the company’s vision and priorities for carbon reduction and sustainable development reflecting on which environmental, financial and social issues are most important, what specific improvements would most benefit local communities, staff and company and which specific actions and initiatives will the company prioritise over the next three years to lay strong foundations for the longer-term net zero strategy.

ANY PAPER COPY OF THIS DOCUMENT IS UNCONTROLLED


Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 17 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

- **Areas of focus** – should align to the main drivers of change and sources of carbon emissions across ALL Kingfisher Construction sites.
 - **Workforce and system leadership** – setting out the approach to engaging and developing the workforce and subcontractors in defining and delivering carbon reduction initiatives and broader sustainability goals.
 - **Sustainable models of care** – embedding net zero principles across all sites is critical. This may include default preferences for lower-carbon interventions and reducing unwarranted variations on site and outcomes that result in unnecessary increases in carbon emissions.
 - **Digital transformation** – focusing on ways to harness new digital technology and systems to streamline service delivery and supporting functions by reducing the use of paper records, printing and postage.
 - **Travel and transport** – outlining plans to reduce carbon emissions arising from the travel and transport associated with the company including increasing levels of public transport, investing in ultra-low emission and zero-emission vehicles for owned and lease vehicles and maximising efficiencies in the transport of goods and services commissioned by the company such as courier services, deliveries, and or van sharing.
 - **Offices and sites** – including reducing carbon emissions by improving energy efficiency and reducing energy usage, decarbonising heating and hot water systems, waste reduction and building in designs during all refurbishments.
 - **Supply chain and procurement** –Thought should be given to how companys may use their individual or collective purchasing power and decisions to reduce carbon embedded in their supply chains. Examples may include reducing all single-use plastic items, reusing or reprocessing equipment, where appropriate and considering lower carbon alternative supplies such as recycled paper.
 - **Adaptation** – provision of a summary of the company’s plans to mitigate the risks or effects of climate change and severe weather conditions on its business and functions.

Developing a net zero plan

Overview

ANY PAPER COPY OF THIS DOCUMENT IS UNCONTROLLED

Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 18 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Identifying a route to net zero emissions for a complex system is particularly challenging. The targets set are as ambitious as possible, while remaining realistic, and are supported by immediate action and a commitment to continuous monitoring, evaluation and innovation.

Areas of focus:

- **Workforce**

Mobilising, informing and upskilling ALL staff to drive and implement the interventions needed to support a Greener world.

The workforce will be vital to delivering the net zero ambitions. Close working within different levels of the system to spread and scale the things that the team knows work and will embed this commitment in guiding policy and documentation.

- **Offices**

The Company office provides opportunity to reduce carbon emissions and a wide range of interventions are possible to help achieve this including the supply of additional insulations to retain heat, LED lighting replacements, solar panel installations to create energy, encouraging staff to cycle to work could all be rolled out to further reduce carbon emissions.

- **Travel and transport**

Reduction in vehicle use via van sharing or the use of public transport where possible, unnecessary journeys and enabling healthier, active forms of travel such as cycling and walking.

- **Supply chain**


KCS business and office goods.

While KCS does not control these emissions directly, it can use its considerable purchasing power to influence change.

Reducing emissions from the supply chain can be done in a range of different ways:

- More efficient use of supplies
- Low-carbon substitutions and product innovation
- Ensuring suppliers are decarbonising their own processes
- Encouraging the reduction of single serving products such as plastic cups or packaging.

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 19 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

Sustainable Development Management Plan (SDMP)

Overview

On a global scale, the Intergovernmental Panel on Climate Change has provided evidence of the scientific, technical and socio-economic aspects of climate change.

In October 2018, it published a special report on the impacts of global warming of 1.5 °C above pre-industrial levels stating the importance of remaining below this level within the next 12 years. Furthermore, the UN Sustainable Development Goals set out the worldwide plan to build a better world for people and our planet by 2030.


These include:

1 No poverty	10 Reduced inequalities
2 Zero hunger	11 Sustainable cities and communities
3 Good health and wellbeing	12 Responsible consumption and production
4 Quality education	13 Climate action
5 Gender equality	14 Life below water
6 Clean water and sanitation	15 Life on land
7 Affordable and clean energy	16 Peace, justice and strong institutions
8 Decent work and economic growth	17 Partnerships for the goals
9 Industry, innovation and infrastructure	

The UK Government has set ambitious targets for carbon reduction through the Climate Change Act 2008 (2050 Target Amendment) Order 2019 to help to mitigate against the effects of climate change.

A Sustainable Development Management Plan forms a key part of the company's strategy to ensure services remain fit for purpose now and in the future. It should outline plans to target actions to make a

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 20 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

positive difference environmentally, socially and financially to create a company that supports the wellbeing of staff, patients and wider community.

In order to do this, KCS plans to:

- Reduce dependency on unrennewable resources such as fossil fuels and heavy metals
- Reduce dependency on substances that persist in nature
- Reduce the destruction of nature
- Ensure we are not stopping people meeting their needs

The process of developing a plan should involve discussions with key stakeholders as well as engaging with the wider staff. This is important to ensure that the plan reflects the needs and motivation of the company and empowers staff to contribute and embed sustainability within their work.

Meeting the requirements of a SDMP

A sustainable approach

Helping to create sustainable, resilient, healthy places and people needs to be approached both by enabling the positives and by reducing the negatives allowing virtuous cycles to constantly improve outcomes.


Why is it important?

Sustainability matters because it addresses, or contributes to, wider KCS commitments and goals such as quality improvement and resource efficiency.

Adapting to climate change

The government's latest Climate Change Risk Assessment lays out the risks of climate change to the UK which are extreme heat, flooding, drought, pests and diseases. Even if we meet the ambitious Climate Change Act's targets for reducing carbon emissions, we need to plan adaptation strategies in order to be a resilient company to a changing climate. This is due to temperatures already above preindustrial levels and time lags in the climate system.

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Document Reference:	KCS-E&SP-V11	AUTHORISED BY  Managing Director
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 21 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

At KCS we are committed to the following:

- Add climate change to the Company's risk register
- Evaluate our contingencies for water/power shortages and supply chain failure to reduce the impact on our service delivery
- Conduct an assessment of flood risk of access routes based on current and future projected climate conditions


Kingfisher are committed to ensuring that the Environmental and Sustainability policy is enforced, managed and monitored by doing the following:

- Monitor our acts and emissions as a considerate corporate entity.
- Staff will be given sufficient training and updates to ensure they can undertake, monitor and keep updated with environmental and sustainability issues associated with our undertakings.
- Utilise a waste broker nationwide to ensure compliance and to assist in the minimisation of waste to landfill and increase the divergence figure where ever possible by utilisation of good working practices.
- Ensure periodic auditing and subsequent review of our proposals to ensure compliance and push for best practice where reasonably practicable.

Environmental and Sustainability Policy Revisions and Reviews


Issue Number	Date	Revision Made	By Who
1	31.3.15		SAW
2	22.1.16		SAW
3	30.3.17	Section 2	JB/SW
4	7.12.18	Annual Review	JB/SAW
5	12.7.19	Update: Change to Director responsible for Health and Safety	JB/PH
6	6.1.20	General Review	JB/PH
7	6.1.21	General Review	JB/PH

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Document Reference:	KCS-E&SP-V11	<p>AUTHORISED BY</p>  <p>Managing Director</p>
Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 22 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		

8	4.1.22	General Review	JB/PH
9	16.8.22	Revise Environment Policy to incorporate Sustainability principles	PH/JB
10	3.1.23	General Review	PH
11	2.1.24	General Review	PH

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Issue Number:	11	
Issue Date:	2.1.24	
Page	Page 23 of 23	
Kingfisher Construction Services Ltd- Environmental and Sustainability Policy		