

VERSION 13A

SUSTAINABILITY POLICY

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Gardiner & Theobald LLP is committed to the adoption of environmentally responsible policies and practices, together with the regular review of both its on-going performance and also the inherent scope for further improvements.

The Company aims, through continuous stakeholder awareness, to create and maintain the highest levels of environmental responsibility.

The Company maintains a fundamental belief in the importance of protecting the environment as set out in ISO 14001:2015, and will take all necessary steps within its powers to eliminate, or control, environmental hazards by:

- Striving to adopt the highest possible environmental standards in all its operations, wherever these are located.
- Aiming to achieve the most economical use of all materials, supplies and energy, using renewable or recycled materials wherever possible.
- Keeping itself and other stakeholders fully informed of best practices elsewhere, including a regular review of planned and unplanned changes in regulations, external conditions etc.
- Minimising waste produced in all parts of the business and employing life-cycle considerations in procurement and client decisions.
- Encouraging similar environmental standards to be achieved by all third parties involved with its business.
- Encouraging employee involvement in positive environmental action.
- Regularly assessing and improving the environmental impact of all its operations.
- Communicating its policy to clients and employees and using our environmental credentials to strengthen our market position.

All Company employees have a responsibility towards the environment in which they live and work. It is the duty of all concerned to demonstrate both a responsible attitude and also a commitment to the Company's objectives.



Richard M Francis
Director
Environment & Sustainability
9 January 2019

1. OUR AIM

The purpose of this policy is to outline Gardiner & Theobald's approach to minimising the environmental impact of its activities.

Gardiner & Theobald is committed at the highest level of our management structure:

- To complying with all relevant environmental regulation and stakeholder expectations to providing all resources needed to reduce our impact on the environment.
- To transparency in our operations and disclosing our performance publicly, though we are not required to do so by law. Our policies and other environmental management information are to be made available to all of our stakeholders. Our Sustainability Policy is available on our website: www.gardiner.com.
- To working to best practice, to assisting our clients in their sustainability aims and to minimising the impact of our activities and those of our clients.
- To minimising environmental risks, incorporating environmental objectives into our core corporate strategy and finding opportunities to improve performance.
- To employing the "Plan-Do-Check-Act" (PDCA) model as required by our ISO 14001 certification.

Together with the British Assessment Bureau, we have conducted a rigorous analysis of our environmental impacts. Below we set out what these are, and what our actions are to reduce them in the coming year.

Gardiner & Theobald creates environmental impact in the following areas and will set annual targets to reduce this.

1.1 Energy Use and Carbon

Gardiner & Theobald uses energy and generates carbon primarily through heating, cooling, lighting, the operation of electrical equipment and transport.

Action: Gardiner & Theobald will purchase energy efficient goods, educate staff and work with building management to reduce energy. The company will encourage the use of public transport and supports the minimisation of business travel.

Our objective is to reduce Scope 1, 2 & 3 emissions year-on-year.

1.2 Waste and Recycling

Gardiner & Theobald produces office waste and electrical waste.

Action: The company will operate in compliance with all WEEE legislation.

Action: Gardiner & Theobald will ensure that it maintains a current waste transfer license and records of waste removal.

Action: Gardiner & Theobald will operate a comprehensive recycling programme.

Our objective is to send no waste to landfill and to improve our recycling performance year-on-year.

1.3 Resource Consumption

Gardiner & Theobald consumes office, paper, catering and cleaning resources.

Action: The company will use only suppliers who have an environmental accreditation or formal environmental policy and will purchase supplies (most notably paper) that have strong sustainable credentials. The Controller of Records will review the sustainability credentials of all sub-contractors and suppliers.

Our objective is to have a full supply chain that is sustainable and in compliance with ISO 14001 objectives.

1.4 Client Services

Gardiner & Theobald provides a range of services where materials and sustainable processes are a concern.

Action: The company will actively manage its supply chain to reduce environmental impact. This will include encouraging suppliers to provide environmentally friendly products and locally based services. When we provide services, we will encourage our clients to use natural, local materials and to minimise their use in design and construction. Environmentally badged products will be given priority wherever they are available.

Our objective is to embed sustainability practices into elements of our core service offering and to add client value by employing best environmental practices.

1.5 Stakeholders (internal and external)

Gardiner & Theobald's stakeholders have a reasonable expectation that the organisation will behave in an environmentally responsible manner, be transparent and employ best practices internally and externally with all stakeholders.

Action: Gardiner & Theobald will make its environmental performance available publicly and will seek external accreditation of its performance. It will also help external stakeholders improve their environmental performance as part of our business offering.

Our objective is to share the results of our ISO 14001 external audit with any interested stakeholder.

1.6 Materials and Packaging

Gardiner & Theobald purchases goods and uses catering that use large amounts of packaging.

Action: Gardiner & Theobald has selected caterers who minimise packaging and use biodegradable products. All packaging that can be recycled is done so through the provision of on-floor recycling facilities.

Our objective is to use materials both internally and externally that are biodegradable, recyclable or can form part of the circular economy.

2. SCOPE OF POLICY

- 2.1 This policy applies to all Gardiner & Theobald LLP sites, though certain elements may not be applicable to all sites.
- 2.2 This policy applies to our approach to future development activity.
- 2.3 It is acknowledged that other considerations such as client choice, nature and choice of available premises and cost/benefit analysis may on occasion limit full compliance with this policy.

3. AIMS AND OBJECTIVES

- 3.1 To ensure that Gardiner & Theobald takes an active approach to minimising its impact on the environment both internally and externally.
- 3.2 To establish accountability and monitoring requirements against benchmarks for improvement.
- 3.3 To ensure that all staff are aware of their role and obligations under the policy and that a culture of environmental responsibility is achieved across the organisation.

4. RESPONSIBILITIES

- 4.1 Gardiner & Theobald's Environment & Sustainability Group (ESG), in conjunction with the firm leadership, is responsible for the setting and periodic review of performance against environmental targets. Richard Francis, Director of the ESG, has ultimate responsibility for the formulation and implementation of policy.
- 4.2 ESG is responsible for championing environmental responsibility across the organisation, monitoring performance against environmental targets and investigating and ensuring remedial action is taken in areas of under performance.
- 4.3 ESG, in conjunction with the firm leadership, is responsible for developing and setting relevant annual targets for improvement and ensuring their integration into the business planning process.
- 4.4 The ESG is responsible for requiring evidence of environmental responsibility from within Gardiner & Theobald's supply chain.
- 4.5 All members of staff are responsible for taking personal ownership of the policy and taking action to support environmental sustainability within their sphere of influence.
- 4.6 The line management structure is responsible for ensuring that all staff members are aware of the policy and individual responsibility within it.
- 4.7 We actively seek input from colleagues at any level and employees may suggest improvements at any time, as well as work with the ESG on specific programmes that may be of interest to them and their teams.

5. IMPLEMENTATION

- 5.1 The policy will be implemented across the whole organisation and annual benchmarks will be set and measured during the review process at regular intervals.
- 5.2. Implementation will be by the ESG, who will conduct three audits throughout the year to chart progress against targets.
- 5.3. Each year, the progress of the firm will be reviewed by an external auditor and revisions made to both the targets and the policy.
- 5.4. A new policy will be issued at the beginning of each calendar year.

6. MAIN RELEVANT LEGISLATION

Gardiner & Theobald commits to meeting all relevant information.

A registrar of relevant regulations affecting the firm is kept by the Director as part of the EMS. The firm relies upon internal and external advice to determine regulation affecting its activities and updates the registrar on a regular basis.

A review of activities shows that the firm must comply with the following:

- 6.1 Disposal of electrical equipment is governed by the EC Directive on Waste Electrical and Electronic Equipment (WEEE).
- 6.2 Ensuring a smoke free work environment (accepting permissible exclusions for residential sites) Smoke Free Regulations
- 6.3 The firm must comply with Environmental Protection Regulations and Duty of Care.
- 6.4. The firm must comply with the Government's Energy Savings and Opportunity Scheme (ESOS).
- 6.5 Other environmental best practice may not be legally necessary, but this policy should be reviewed regularly to establish on-going compliance with legislation. The firm should also seek to go beyond regulatory compliance and meet stakeholder expectations and industry best practice.
- 6.6 A complete list of relevant legislation can be found in the Gardiner & Theobald Environmental Review, a companion document to this Policy.

7. PROCUREMENT

- 7.1 Gardiner & Theobald externally purchases a range of products and services.

The company will actively manage its supply chain to reduce environmental impact. This will include encouraging suppliers to provide environmentally friendly products and locally based services.

Gardiner & Theobald pledges to:

- Procure services that reduce our environmental impact: for example, our off site recycling programme and video conferencing facilities.
- Purchase equipment that minimises our use of resources: for example, energy efficient computer equipment and double-sided printers.
- Print promotional material on recycled paper and minimise use through preference for on-line dissemination
- Purchase printing materials and paper that are environmentally accredited by an independent organisation (ISO 14001, FSC, etc.)
- Work with suppliers who have an environmental policy or independently-verified accreditation.
- Encourage, wherever possible, our clients, our sub-contractors and colleagues to use sustainable materials (FSC timber, recycled aggregates, low toxicity finishes, etc.)

7.2 Gardiner & Theobald will engage with frameworks and other colleagues to disseminate best practice on sustainable procurement.

Action: The company is currently part of a DEFRA Sustainable Supplier team that regularly reviews best practice in sustainable procurement.

8. GETTING HELP

8.1 Guidance on the implementation and interpretation of this policy can be sought from the ESG.

8.2 Guidance on issues relating to the environment can be found on our intranet site

8.3 Communications should be expressed in writing to Richard Francis, Director of the ESG, at firm headquarters (South Crescent) or r.francis@gardiner.com.

9. REVIEW

9.1 Environmental performance will be reviewed as part of the business planning process and Gardiner & Theobald will submit itself to annual audit as part of retaining ISO 14001:2015 certification.

9.2 In addition, Internal Audits will be carried out against sites that are ISO 14001:2015 certified on a quarterly basis.

9.3 Best practice, as identified as part of our Internal Audits and other industry guidance will be used to develop and update our Policy

9.4 This Policy will be reviewed and reissued at the beginning of every calendar year.

9.5. The above activities will be conducted by the ESG under the management of and with the approval of the Management Board.

10. SIGNIFICANT IMPACTS AND ASSESSING RISKS

- 10.1 Significant impacts will be determined in discussion with the British Assessment Bureau (BAB) based on the annual review of Gardiner & Theobald. Should any regulation force a change in the significance of impacts, this policy will be modified immediately and colleagues advised.
- 10.2 We will review internally, and adjust for any changes in the status or our activities or the scope of our impacts to see if this status needs to be changed.
- 10.3. As part of this, each member of the ESG will be required to notify the Director of any change in status to our impacts, which will also be reviewed during our Internal Audits
- 10.4. One item that may change the status of impact is changes to legislation, which are rapid, particularly in energy. The Director will review any changes to regulation at the internal audits and assess whether any of the impacts need to be changed.
- 10.5 Should there be any changes to regulation, the ESG will immediately notify all Gardiner & Theobald staff and take steps for immediate compliance.
- 10.6 A risk register will be maintained by the Director and review and updated during the annual meeting with the BAB and during internal audits.
- 10.7 Please see the Environmental Review for procedures and more information.

11. INFORMATION AND COMMUNICATION

- 11.1 Gardiner & Theobald maintains all ESG information on the company internal website, including this policy, our environmental management system, a list of information documents and presentations, and other best practice material.
- 11.2. Information sessions on sustainability are provided regularly and interested parties will be notified by People and Development.
- 11.3 Colleagues are encouraged to send their comments, questions, or suggestions at any time to Richard Francis, Director, r.francis@gardiner.com.

12. CONTROL OF DOCUMENTS

- 12.1 All documents relating to environmental management shall be retained by the Controller of Documents.
- 12.2. Documents will be clearly marked and posted on the internal Gardiner & Theobald knowledge site for review by all colleagues
- 12.3 Revisions to documents will be clearly by listed by date and reviewer, usually the Director
- 12.4 Only those documents listed in the central register should be considered up to date. All printed copies issued before the date of submission or review should be checked to ensure they match the central register of documents.

12.5 When changes to documents or other items on the central register are made colleagues shall be notified electronically. Changes to documents will also be noted by information on the central register of documents.

12.6. At the end of each calendar year, staff should recycle any documents relating to the EMS as new copies will be issued at the beginning of the next calendar year.

13. ISO 14001

13.1 Gardiner & Theobald's policy is informed by our ISO 14001 Accreditation and is reviewed annually by the British Assessment Bureau. A copy of our ISO certificate and additional information demonstrating our compliance with this Policy is available upon request.

GARDINER & THEOBALD LLP

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gardiner.com

Sustainability Policy
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