

Contents

1	Introduction.....	1
1.1	Overview	1
1.2	Sustainability Strategy	2
1.3	Sustainability Policy.....	3
2	Environmental aspects and impacts register	5
2.1	Definitions	5
2.2	Register of environmental impacts and aspects	5
3	Environmental policy and objectives	7
3.1	Definitions.....	7
3.2	Environmental Policy and objectives.....	7
4	Environmental targets	9
4.1	Definitions.....	9
4.2	Environmental targets.....	9
4.3	Environmental target monitoring procedure	11
5	Support and operation.....	12
5.1	Management responsibilities.....	12
5.2	Operational control.....	13
5.3	Training	14
5.4	Internal communications	14
5.5	External communications.....	14
6	Environmental monitoring and measurement.....	15
6.1	Definitions.....	15
6.2	Monitoring and measurement	15
6.3	Monitoring and measurement procedure	17
6.4	Management Review	18
6.5	Internal Audit.....	18
A1.	Sustainability Project Management Checklist	20
A2.	Environmental checklist included as part of due diligence procedures.....	23
A2.1	Responsibility	23
A2.2	Timing.....	23
A2.3	Procedure	23
A2.4	Checklist.....	23
A3.	Management Review process	25
A4.	Performance measurement procedure for managed portfolio	26
A4.1	Responsibility.....	26
A4.2	Timing.....	26
A4.3	Procedure	26
A4.4	Performance Measurement tool	26
A5.	Legal and Other Obligations Compliance Checklist.....	27
A5.1	Responsibility	27
A5.2	Timing.....	27
A5.3	Procedure	27

A5.4 Compliance ChecklistError! Bookmark not defined.

A6. Contractors' Sustainability Checklist 28

A6.1 Responsibility 28

A6.2 Timing 28

A6.3 Procedure 28

A6.4 Contractors' Sustainability ChecklistError! Bookmark not defined.

Introduction

Overview

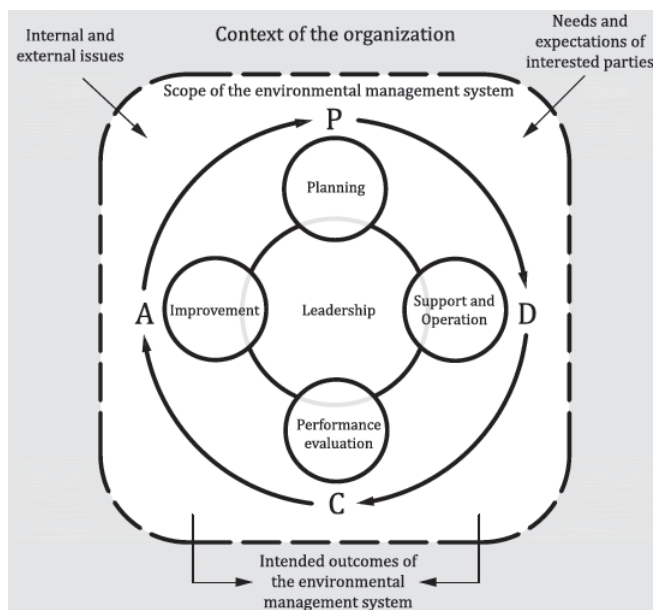
This document has been prepared to provide the framework for key components of an Environmental Management System (EMS). It covers 100% of UK managed assets where we have direct control (i.e. multi-let properties) and 100% of development projects and also includes Head office activities within our control in the context of a leased space.

The EMS is structured under the following headings, which are intended to reflect the key components of a good practice EMS certified to ISO14001:

- Environmental aspects and impacts register
- Environmental policy and objectives
- Environmental targets
- Environmental monitoring and measuring
- Environmental compliance obligations
- Support and operation
- Management responsibilities and leadership
- Performance evaluation

These key components enable Helical to demonstrate to socially responsible investors and other interested stakeholders how we are addressing the environmental risks associated with our business activities. The suggested approach places a particularly strong focus on environmental performance improvement through the ongoing use of both targets and Key Performance Indicators. The diagram below illustrates how the different elements are put together to form an effective EMS in adherence to ISO14001.

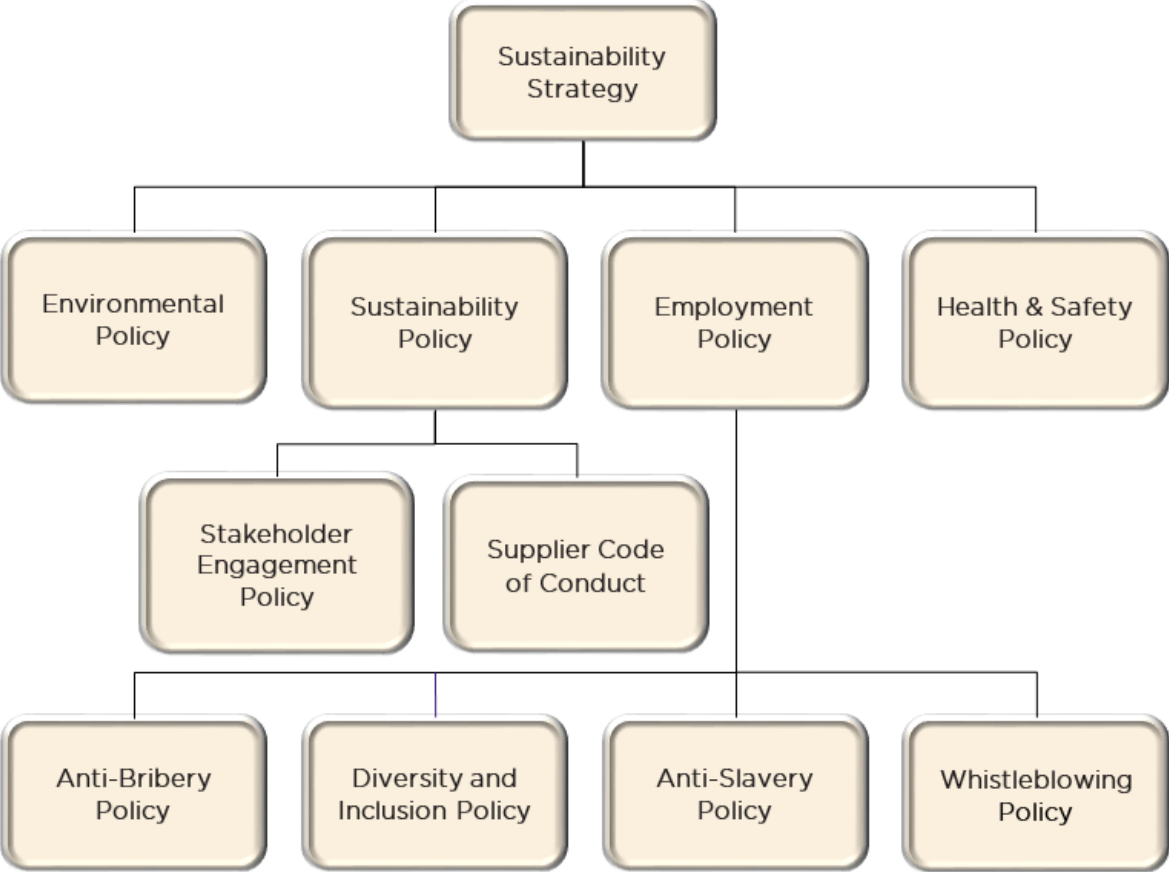
Figure 1 Overview of an effective EMS



Sustainability Strategy

The EMS underpins Helical's overarching Sustainability Strategy which includes the following elements:

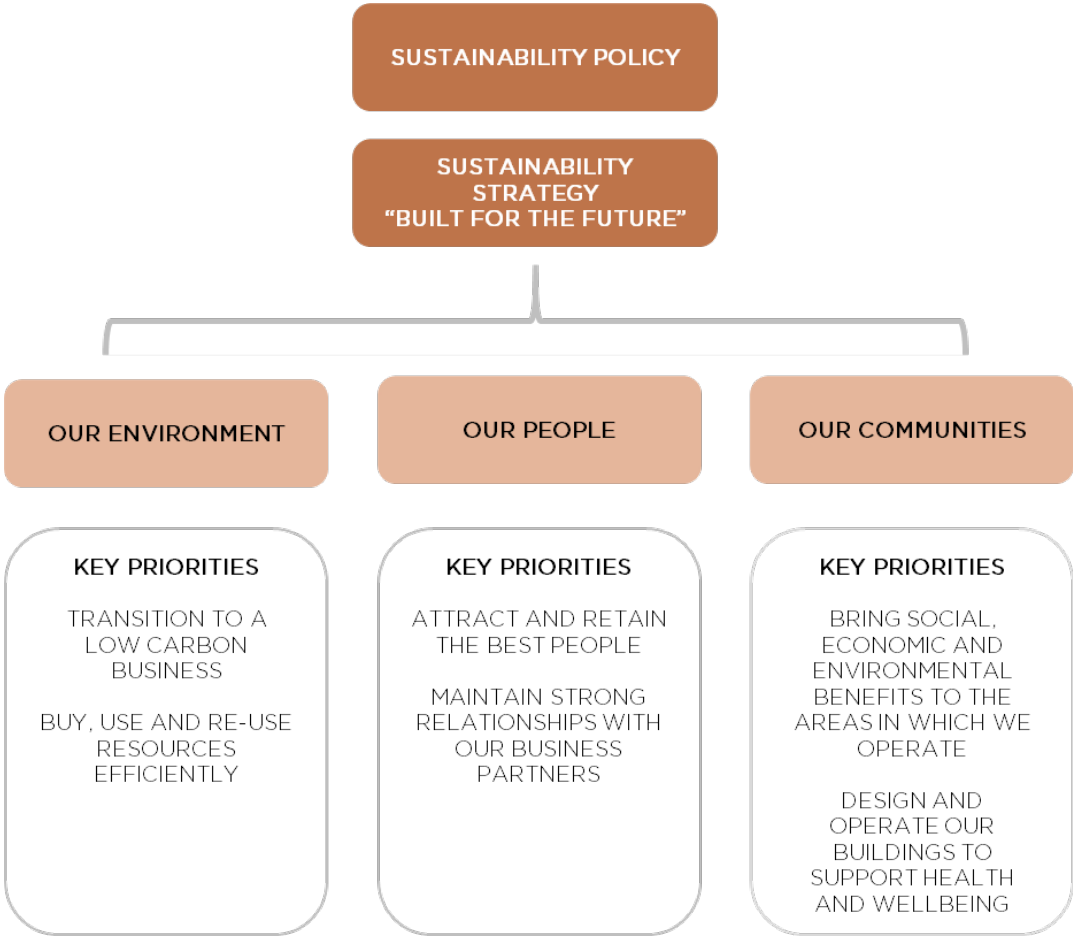
- A set of Sustainability related policies which sets out Helical's high-level commitment across a number of impacts areas as detailed in the organogram below. These are reviewed at the Sustainability Committee and Board level annually and are implemented by our senior management team.
- Performance targets to enable focus on efforts throughout the year on measurable, yet achievable performance goals.
- Key Performance Indicators (KPIs) to monitor progress towards these targets and to ensure reporting in line with investor disclosure requirements notably CDP, GRESB and FTSE4Good
- Effective use of internal evaluation and review through quarterly meetings of key Helical personnel, external sustainability advisors and principal managing agents to ensure effective delivery of the objectives and targets.



Sustainability Policy

Helical plc is a London and Manchester focused property development and investment company. We aim to deliver market-leading returns by developing dynamic properties and letting them to diverse tenants on flexible terms and applying a proactive approach to asset management.

Our Sustainability Policy sets out our high level environmental and social objectives for our key impact areas. These objectives are in support of our key priorities as set out in our Sustainability Strategy “Built for the Future” encompassing, Our Environment, Our Communities and Our People.



Our Objectives

- We will endeavor to take appropriate action to ensure that we minimise our impact on the environment, by adhering to the commitments outlined in our Environmental Policy.
- We will implement considerate construction practices on all developments and refurbishments, including consulting with local communities and stakeholders on large schemes.
- We will review the needs of the local communities within which we operate and in conjunction with our Managing Agents support initiatives that are relevant to our business.

- We will work with our contractors to run apprenticeships schemes for young people to learn practical skills on our construction sites, providing valuable experience in preparation for their futures.
- We will prohibit the use of materials and substances that have potentially hazardous effects on the environment, human health and wellbeing.
- We will incorporate design features that encourage a healthy lifestyle such as cycle storage and showering facilities
- We will create a calendar of events that focus on health and wellbeing
- We will respect the principles of equality and diversity in our employment practices as detailed in our Employment Policy and endeavour to comply with the requirements of the Disability Discrimination Act (DDA) throughout our managed portfolio.
- We will work collaboratively with our Managing Agents and Consultants to ensure that our managed portfolio provides best practice to our occupiers in terms of sustainability, environmental compliance and health & safety practices.
- We will work collaboratively with our Joint Venture partners and project teams to understand their needs, delivering pragmatic and practical solutions to their sustainability challenges.
- We will look to encourage contractors to use local labour on construction and refurbishment projects where feasible.
- We will ensure that all of our developments sites and assets implement appropriate health and safety practices in line with regulatory requirements, to protect our contractors, sub contractors, tenants and employees as detailed in our Health and Safety Policy.
- We will seek to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains as detailed in our Modern Slavery Act statement.
- We will seek to understand and respond to our investors' evolving concern for sustainability in the context of real estate development and management.

An endorsement of Helical's commitment to managing environmental and social impacts is our continued listing in the FTSE4Good Index and our participation in Carbon Disclosure Project (CDP) and GRESB. The FTSE4Good Index measures the performance of companies that meet globally recognised environmental, social and governance standards and facilitates investment in those companies. Maintaining listed status on this Index remains a key priority for Helical and informs our evolving approach to Sustainability.

The Policy is reviewed annually by the main board and is implemented by management representatives working with our project teams and managing agents.

Environmental aspects and impacts register

Definitions

- ISO 14001:2015 describes environmental aspects as:

“Elements of an organisation’s activities, products or services that interact or can interact with the environment.”

- ISO 14001:2015 describes environmental impacts as:

“Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation’s environmental aspects.”

Register of environmental impacts and aspects

Based upon a detailed analysis of Helical’s portfolio of developments and investments, a register of environmental aspects and impacts based upon the company’s core business activities has been developed. Helical has prioritised those environmental impacts considered to be of highest significance to the company. This was undertaken on the basis of the following criteria:

- Helical’s ability to directly control the particular environmental impact (it was agreed that Helical has control over all impacts except those that arise directly as a consequence of tenants/contractors own activities, where it can only seek to influence their actions).
- The likelihood/frequency of a particular impact occurring as a result of a particular activity.
- The severity of the consequences of a particular impact occurring.

The figure below lists only those environmental impacts that were considered to be of HIGH significance. A more complete spreadsheet listing *all* the environmental impacts according to low, medium and high significance has been prepared and is also retained by Helical. The significant environmental impacts identified in this way formed the basis for reviewing Helical’s environmental policy and objectives, and in particular for suggesting the environmental targets.

Figure 2 Impacts and Aspects Register

Activities, products and services	Environmental Aspects	Helical Control or Influence	Environmental Impacts	Significance
Acquisition				
All sites	Site selection	Control	Land use, biodiversity	High
	Site selection	Control	Emissions to land/water	High
Existing buildings	Building survey	Control	Hazardous materials	High
Property management (all multi-let building types)				
Offices (multi-let)				
	Energy use	Control	Emissions to air (climate change)	High
	Water use	Control	Resource depletion	High
	Waste management	Influence	Resource depletion, emissions to water/air/land	High
Construction/ refurb works (all property types)				
	Materials selection	Control	Resource depletion (e.g. deforestation)	High
Property development and refurbishments (all building types)				
Design				
	Energy Use	Control	Emission to air (climate change)	High
	Procurement	Control	Resource depletion	High
	Landscaping/planting	Control	Biodiversity/ ecology	High
	Transport	Control	Emission to air (climate change)	High
Construction/demolition				
	Waste management	Control	Resource depletion, emissions to water/air/land	High
	Spillages/contamination	Influence	Emissions to land, emissions to water	High
	Procurement	Control	Resource depletion	High
	Transport	Influence	Emissions to air (climate change)	High
	Noise, dust	Influence	Nuisance	High

Environmental policy and objectives

Definitions

- ISO 14001:2015 describes the environmental policy as:

“A statement by the organisation of its intentions and direction related to environmental performance which provides a framework for setting environmental objectives.”

- ISO14001:2015 defines an environmental objective as:

“An overall result to be achieved set by the organisation consistent with its environmental policy. These should be measurable (if practicable), monitored, communicated and updated as appropriate.”

Environmental Policy

Helical plc is a London and Manchester focused property development and investment company. We aim to deliver market-leading returns by developing dynamic properties and letting them to diverse tenants on flexible terms and applying a proactive approach to asset management.

We recognise our responsibility to reduce any adverse environmental impacts arising from our business activities and we work within existing regulatory frameworks to comply with all relevant environmental legislation as a minimum through our operations. Our overall goal is to operate in an environmentally sustainable manner throughout our activities.

Our response to environmental issues is practical and pragmatic and reflects our desire to be a responsive, flexible and collaborative partner and landlord.

As outlined in our Sustainability Strategy, “Built for the Future” we have identified our two key priorities to address the environmental impact of our operations;

- **Transition to a lower carbon business**
- **Buy, use and reuse resources efficiently**

In support of these priorities we have the below overarching objectives all of which provide a framework for performance targets which we commit to monitor and report on to ensure compliance, and to meet evolving client and investor expectations in moving towards being a sustainable business:

- All new developments to be net zero carbon by 2030.
- Follow the principals set out in our 'Net Zero Carbon Pathway'.
- Offset 100% of the residual embodied carbon for new developments.
- Operational energy intensity target of 90kWh/m² for our existing assets and developments
- Embodied carbon target of 600kg/co₂/m² for all new developments and major refurbishments by 2030.
- Using a science based target we will reduce our combined Scope 1 and Scope 2 emissions by 25% by 2025 compared with 2019 base year in line with the well below 2 degree scenario
- Purchase 100% green tariff electricity for our managed portfolio.

- We will limit the consumption of natural resources including water in both the managed and development portfolio.
- We will implement appropriate waste management practices, seeking to reduce, re-use and recycle before disposal to landfill in both our managed and developed portfolio.
- We will protect and enhance biodiversity and ecology wherever practical.
- We will integrate environmental considerations through passive design in new and refurbished buildings, seeking wherever possible to achieve good practice standards. As a minimum, all new developments will aim to achieve BREEAM Outstanding.
- We will endeavour to source timber from legal sustainable sources and where possible, from well managed sources certified by third-party certification bodies accredited by the Forest Stewardship Council.
- We will prohibit the use of materials and substances that have potentially hazardous effects on the environment, human health and wellbeing.
- We will investigate pollution and other environmental liabilities as part of our due diligence procedures when acquiring new assets.
- We will minimise the risks of pollution from emissions to air, water and/or land contamination, particularly during construction or demolition.
- We will minimise carbon emissions associated with transport to our managed assets and construction sites wherever possible.
- We will endeavour to address the issues resulting from climate change such as the exposure to extreme weather risks including flooding and subsidence through appropriate design and asset appraisal.
- We will ensure that project teams managed by Helical refer to our Sustainability Project Management Checklist to ensure a consistent standard of environmental management is applied to our projects.
- We will encourage the sharing of good environmental practices across our operations.
- We will work closely with our tenants in order to improve their own environmental performance.
- We will seek to reduce the adverse environmental impacts associated with our own management practices and procurement policies
- We will monitor and review our performance against our environmental objectives on a regular basis in order to demonstrate that we are achieving the standards that we set ourselves and ensure their ongoing relevance.
- We will seek to develop on existing brownfield locations and aim to limit the impact our new developments have on the local environment.
- This Policy is reviewed annually by the main board and is implemented by management representatives working with our project teams and managing agents

Environmental targets

Definitions

- ISO 14001:2015 does not define environmental targets but states that:

“When planning how to achieve its environmental objectives, the organisation shall determine: what will be done; what resources will be required; who will be responsible; when it will be completed; and how it will be evaluated.”

Environmental targets

Helical has been setting targets since 2004. Headline objectives and targets are set out in the overarching Sustainability Strategy. These are included within the below with additional supporting targets. These targets form the basis of an Environmental Management Program (EMP), ensuring that we are implementing the environmental policy and objectives in line with a commitment to continuous improvement.

Figure 3 below shows that Helical is committed to at least one target against each objective, thereby demonstrating how these objectives are being implemented. In view of the fact that Helical’s objectives are broad enough to cover different areas of activity (e.g. energy conservation is relevant to both development and investment), there are in a number of cases several targets.

Objective	Targets
All new developments to be net zero carbon by 2030.	Operational energy intensity target of 90kWh/m ² for our existing assets and developments
Follow the principals set out in our 'Net Zero Carbon Pathway'	Embodied carbon target of 600kg/co ₂ /m ² for all new developments and major refurbishments by 2030.
Within the existing portfolio we will seek a 25% reduction in the operational carbon emissions by 2025	Using a science based target we will reduce our combined Scope 1 and Scope 2 emissions by 25% by 2025 compared with 2019 base year in line with the well below 2 degree scenario.
We will limit the consumption of natural resources including water in both the managed and development portfolio	Reduce landlord purchased water consumption by 2% from 2019 baseline Purchase 100% green tariff electricity for managed portfolio
We will implement appropriate waste management practices, seeking to reduce, re-use and recycle before disposal to landfill in both our managed and developed portfolio.	Divert at least 90% of construction and demolition waste from landfill for all new developments and major refurbishments and aim for minimum of 50% recycling. Achieve a recycling rate of 50% at managed properties.
Objective	Targets
We will protect and enhance biodiversity and ecology wherever practical.	Develop site specific Biodiversity Action Plans as appropriate on individual sites.
We will integrate environmental considerations through passive design in new and refurbished buildings, seeking wherever possible to achieve good	All new developments above a contract value of £5 million to achieve a minimum of BREEAM Outstanding.

practice standards. As a minimum, all new developments will aim to achieve BREEAM Outstanding.	
We will endeavour to source timber from legal sustainable sources and where possible, from well managed sources certified by third-party certification bodies accredited by the Forest Stewardship Council.	Require project teams to source timber, if used, from sustainable sources and aim for a minimum of 50% chain of custody certified timber to Forest Stewardship Council and or Programme for the Endorsement of Forest Certification.
We will prohibit the use of materials and substances that have potentially hazardous effects on the environment, human health and wellbeing.	Review the standard list of prohibited materials that are used for both refurbishment and construction works and ensure this is incorporated within standard design specifications.
We will investigate pollution and other environmental liabilities as part of our due diligence procedures when acquiring new assets.	Conduct ecological assessments on all new sites prior to construction and take appropriate mitigating and enhancement actions
We will minimise the risks of pollution from emissions to air, water and/or land contamination, particularly during construction or demolition.	Maintain zero pollution incidents and enforcement notices. Investigate feasibility of monitoring emissions to air and water at construction sites and record.
We will minimise carbon emissions associated with transport to our managed assets and construction sites wherever possible.	Provide information to tenants and contractor on local cycle routes where secure cycle storage has been provided and public transport options where available.
We will endeavour to address the issues resulting from climate change such as the exposure to extreme weather risks including flooding and subsidence through appropriate design and asset appraisal.	Ensure flood risk is assessed for all land purchased and acquisitions Where appropriate include climate change adaptation measures such as sustainable urban drainage systems in all development projects
We will ensure that project teams managed by Helical refer to our Sustainability Project Management Checklist to ensure a consistent standard of environmental management is applied to our projects.	All projects to utilise the Sustainability Project Management Checklist from site acquisition to post practical completion Ensure Project team completes and updates the Project Checklist for Site Sustainability throughout the life of the project ³
We will encourage the sharing of good environmental practices across our operations.	Identify engagement measures to work with our managing agents and occupiers on selected managed assets to encourage knowledge sharing
Objective	Targets
We will work closely with our tenants in order to improve their own environmental performance.	Provide appropriate information and support to building occupiers and managing agents to ensure optimum operation and efficiency of buildings. Work collaboratively with our Managing Agents and Consultants to ensure that our managed portfolio provides best practice to our occupiers in terms of sustainability, environmental compliance and health & safety practices. Aim to have at least one ongoing biodiversity project at all managed assets. Tenants will be offered the option to support and participate with the projects.

Environmental target monitoring procedure

Internal EMS Focal Points nominated within Helical representing both the Development and Investment teams of the business meet with external environmental consultants, RPS, on a quarterly basis to discuss progress against the targets outlined above. The meetings serve as a forum to discuss challenges related to target delivery. They also serve an external audit function, ensuring that appropriate systems and processes for data collection are in place at both site and corporate level. All relevant information from these meetings is passed back to the target owners.

Support and operation

Management responsibilities

The Environmental Policy has been approved by the Helical Board of Directors and is endorsed by the Chief Executive Matthew Bonning-Snook. The organogram below depicts how responsibility is delegated throughout the organisation.



In September 2019 a Sustainability Committee was established with Matthew Bonning-Snook, Chief Executive, the Chairman.

The purpose of the Committee is to monitor and update/recommend updates to the Company's sustainability related strategies, policies, initiatives, targets and performance including the operation of the EMS. The Committee meet on a quarterly basis and report to the Executive Committee.

Head of Sustainability – Laura Beaumont – reports to Matthew Bonning-Snook and oversees the delivery of the EMS as part of the overall Sustainability Strategy.

Day to day responsibility for the EMS has been allocated to named individuals, who are the identified EMS Focal Points within the Investment and Development teams:

- John Inwood (Head of Asset Management)
- Elliott Saunders and Matt Redgroce (Senior Development Executives)
- Lois Robertson (Office Manager)

Operational implementation of the EMS rests with Helical's internal staff, managing agents and external consultants including Tanya Lloyd-Jones, a consultant at RPS.

Operational control

There are a range of procedures in place to ensure systematic implementation of the EMS by external consultants and internal staff alike.

For example, in the context of design and construction, Helical utilises a Sustainability Project Management Checklist (see appendix A1) which is applied on all projects from site acquisition through to post practical completion. Its purpose is to provide design teams with a reference to ensure the consideration of sustainability at key phases of design. The checklist is also used as a means to gather appropriate KPI data related to development impacts (through specification of contractual requirements to provide sustainability data) thereby enabling reporting of progress against environmental targets. RPS fulfils an audit role in regards to compliance against the checklist, ensuring the checklist is properly utilised at appropriate stages of a project.

At the site acquisition stage, we have an environmental checklist which is included as part of the due diligence process (see Appendix A2). For all property (or company) purchases, the environmental risks included in this checklist are assessed and reported on to the Helical Board.

See also section 6.3 for details of monitoring and measurement procedures at managed assets and on development sites.

Training

Appropriate training is provided to all staff involved in the implementation of the EMS and Sustainability objectives. This includes annual one on one sessions with individuals responsible for target delivery to ensure that monitoring and measurement procedures are accurate and robust for reporting of progress against targets.

Internal communications

The EMS and operational procedures are stored on the company's website and can be accessed by all staff.

External communications

Performance against the key performance indicators are provided in overview in the Annual Report as part of the Sustainability section for both the managed and development portfolio. The Annual Report is available on the company website and as a hard copy circulated to shareholders and other interested stakeholders.

Environmental monitoring and measurement

Definitions

- ISO 14001:2015 defines environmental performance evaluation as:

“The methods used by the organisation to monitor and measure, analyse and evaluate should be defined in the environmental management system in order to ensure that:

- *the results of monitoring and measurement are reliable, reproducible and traceable;*
- *the analysis and evaluation are reliable and reproducible, and enable the organisation to report trends.”*

Monitoring and measurement

Helical uses Key Performance Indicators (KPIs) to monitor performance in meeting its objectives and targets. The purpose of these indicators is to establish a baseline of performance against which quantifiable improvement targets can be set and objectively assessed. This section identifies the indicators against which Helical measures its significant environmental impacts. They have recently been revised to reflect the reporting requirements of the latest set of environmental targets.

Figure 3 Environmental Key Performance Indicators

Environmental aspects	Environmental impacts	Environmental performance indicators	Units
Energy use	Emissions to air (climate change)	Total energy use in managed investment portfolio (Whole building electricity (kWh) and gas (kWh) consumption)	kWh
Energy use	Emissions to air (climate change)	Energy efficiency in managed investment portfolio (Whole building electricity (kWh) and gas (kWh) consumption)	kWh/m ² (net lettable area)/year
Energy use	Emissions to air (climate change)	Total carbon emissions from managed investment portfolio (Whole building electricity (kWh) and gas (kWh) consumption)	kgCO ₂
Energy use	Emissions to air (climate change)	Carbon intensity from managed investment portfolio (Whole building electricity (kWh) and gas (kWh) consumption)	kgCO ₂ /m ² (net lettable area)/year
Water use	Resource depletion	Total water use in managed investment portfolio (Landlord controlled water consumption)	m ³
Water use	Resource depletion	Water efficiency in managed investment portfolio (Landlord controlled water consumption)	m ³ /m ² (net lettable area)/year
Waste management	Resource depletion	Waste recycling rate managed investment portfolio	m ³

Environmental aspects	Environmental impacts	Environmental performance indicators	Units
		(Volume (m ³) or weight (tonnes) of following waste streams: cardboard, white paper, colour paper, plastics, metal, wood, glass, hazardous, organic, misc, other)	
Waste management	Resource depletion	Waste segregated on site and recycled	% (by tonnes)
Transport	Emissions to air (climate change)	Number of cycle locking points per 100 occupants	Number per 100 occupants
Energy use	Emissions to air (climate change)	Total energy use in managed investment portfolio (Landlord controlled electricity (kWh) and gas (kWh) consumption)	kWh
Energy use	Emissions to air (climate change)	Energy efficiency in managed investment portfolio (Landlord controlled electricity (kWh) and gas (kWh) consumption)	kWh/m ² (comm on parts areas)/year
Energy use	Emissions to air (climate change)	Total carbon emissions from managed investment portfolio (Landlord controlled electricity (kWh) and gas (kWh) consumption)	kgCO ₂
Energy use	Emissions to air (climate change)	Carbon intensity from managed investment portfolio (Landlord controlled electricity (kWh) and gas (kWh) consumption)	kgCO ₂ /m ² (common parts areas)/year
Design	All	BREEAM New Construction/BREEAM Non Domestic Refurbishment	BREEAM Rating
Energy use	Emissions to air (climate change)	Total energy use on site (site purchased electricity (kWh) and gas (kWh) consumption)	kWh
Energy use	Emissions to air (climate change)	Energy efficiency on site (site purchased electricity (kWh) and gas (kWh) consumption)	kWh/£100k construction cost/year
Water use	Resource depletion	Total water use on site (site purchased water consumption)	m ³
Water use	Resource depletion	Water efficiency on site (site purchased water consumption)	m ³ /£100k construction cost/year
Waste management	Resource depletion	Construction waste diverted from landfill (Total construction and demolition waste and construction and demolition waste diverted from landfill)	% (by tonnes)
Waste management	Resource depletion	Materials from recycled sources incorporated into new build	% (by tonnes)

Environmental aspects	Environmental impacts	Environmental performance indicators	Units
		(Total value (£ or Euro) of construction materials and % from recycled sources)	
Construction (including refurbishment)	Neighbourliness	Proportion of construction sites certified by the Considerate Constructors Scheme	% by area
Construction (including refurbishment)	Nuisance	Number of complaints received on construction sites	Number
Spillage/contamination	Emissions to water, emissions to land	Number of pollution incidents	Number
Energy use	Emissions to air (climate change)	Total energy use in head office (kWh) (Electricity (kWh) and gas (kWh) consumption)	kWh
Transport	Emissions to air (climate change)	Total business travel emissions (air miles and car miles)	kgCO ₂

Monitoring and measurement procedure

An excel spreadsheet tool is issued by Helical to all managing agents responsible for the day to day management of the multi-let offices in the portfolio. The tool specifies the relevant information to be captured across different property types. See appendix A4 for a screenshot of the tool used to collect data at managed properties.

Agents and site managers enter the data specified in the spreadsheet into the appropriate cells, and issue the completed information back to Helical on specified quarterly dates. This information is collated and analysed by RPS, so that it can be reported to external stakeholders and to enable the setting of performance related targets. In support of the above, a legislation compliance checklist (see appendix A5) is updated annually by RPS and completed by the managing agents before March 31st each year. This is a self auditing mechanism to confirm legal compliance within the managed portfolio.

In terms of development of performance measurements, contractors are required to report on the development (design and construction) indicators listed in Figure 4 above. The following process is in place to ensure appropriate performance measurement at development sites:

- Kick off meeting with contractors in order to formally agree the sustainability KPIs (and add any others) and agree the way in which monitoring will take place over the life of the contract.
- Contractors provided with guidance on how to meet the sustainability commitments under the contract.
- Contractors' performance monitored on a regular basis.

Contractors asked to report on sustainability annually detailing:

- If any health, safety or environmental incidents have arisen and the action taken to correct these
- Evaluation of performance against the sustainability KPIs in the contracts and where performance is insufficient, the corrective actions that will be undertaken to improve

performance

- Any measures that have been put in place over and above the contract requirements to improve the suppliers' sustainability performance

Reporting information is collated by use of the Contractors Sustainability Checklist at Appendix 6

Management Review

The Management Review is intended to determine whether the EMS is suitable, adequate and effective for its intended purpose. In order to ensure continuous improvement, and to establish whether the company is meeting the objectives and targets it has set itself, Helical commits to undertake a Management Review of the EMS on an annual basis. The objectives of these reviews are amongst other things to:

- Review the content and appropriateness of the Environmental Policy and objectives in light of industry good practice.
- Provide a critical evaluation of progress against the corporate environmental objectives and targets.
- Review the data gathered against environmental performance indicators and seek to establish whether this represents poor, typical or good practice. Helical uses this information to decide on future Environmental Management Programmes and targets.
- Make recommendations for future targets and action.

For further details on the Management Review process see appendix A3. The findings of the Management Review are presented to the Board.

Internal Audit

As part of RPS's ongoing support to Helical, quarterly meetings are held with all target owners to evaluate progress against targets to date and to identify solutions to any potential barriers to target implementation. A review of progress against targets also takes place on an annual basis. The results of this review are published on Helical's website, included within the Annual Report and shared with the Board.

RPS also undertakes an annual internal audit of EMS implementation at both site and corporate level, incorporating the following EMS components:

- Policy
- Aspects & Impacts
- Objectives and Targets
- Environmental Management Programmes
- Governance and Responsibility
- Monitoring & Measurement
- Legal and Other Compliance Obligations
- Management Review
- Resources, Awareness and Competence

- Communication

Sustainability Project Management Checklist

	Project Stage	RIBA Description of Key Tasks	Sustainable Key Objectives	Task list for Helical's appointed project manager	Responsibility
Planning	Strategy	Not a RIBA Stage	Implementation of Helical's Sustainability Strategy	Review Helical Sustainability Strategy, Environmental Policy and Objectives and Targets on annual basis	Helical/RPS
				Develop and implement Targets and, where appropriate, Key Performance Indicators relevant to development projects	Helical/RPS
Land Strategy	Site Acquisition	Application for outline planning permission (where this is not already in place on the site)	Acquire sites that can be developed to a high standard of environmental performance and sustainability	Undertake a technical environmental due diligence	Project team
				Secure relevant licences and approvals	Project team
				Produce sustainable design requirements e.g. BREEAM Very Good	Project team
				Ensure the inclusion of sustainability as part of the application for Outline Planning in accordance with the guidance and requirements of the local authority	Project team
Preparation	A Project Appraisal	Identify needs and objectives, business case and possible constraints on development	Identify sustainability needs and objectives	Review Helical and any partner Sustainability Commitments and how these can be applied to the development	Helical and Project team
				Identification of sustainability constraints, opportunities and the business case	Undertake feasibility studies and site assessment (flood risk, energy, land contamination, biodiversity etc)
			Review planning opportunities and constraints		Project team
			Undertake cost benefit analysis of various sustainability options		Project team

		Project Stage	RIBA Description of Key Tasks	Sustainable Key Objectives	Task list for Helical's appointed project manager	Responsibility
	B	Design Brief	Development of initial statement of requirements into the design brief confirming key constraints and requirements	Ensure inclusion of key sustainability requirements and constraints in design brief	Develop a project brief which includes key sustainability objectives for the project	Project team
Design		Concept	Implementation of design brief and preparation of additional data	Ensure at Concept Design that outline specifications address sustainability objectives	Undertake a BREEAM/LEED/Code pre-assessment	Project team
					Register scheme with relevant assessment body (BRE/LEED)	Project team
			Undertake options analysis detailing the cost and payback of sustainable building design elements e.g. renewable energy technologies		Project team	
			Preparation of Concept Design including outline proposals for structural and building services systems and outline specifications		Undertake screening proposal for Environmental Impact Assessment (EIA) where required by the planning authority	Project team
			Review of procurement route		Review procurement procedures to address sustainability requirements	Project team
		Design Development and Technical Design	Development of concept design to include structural and building services systems, updated outline specifications and cost plan	Preparation of technical design and specifications sufficient for design stage sustainability assessment (BREEAM/LEED/Code)	Undertake a detailed energy study	Project team
					Undertake a design stage BREEAM/LEED/Code Assessment	Project team
					Undertake EIA or Supplementary studies as determined by the Planning Authority	
			Complete sustainability planning statement where required for the planning application.	Project team		
		Application for detailed planning permission	Completion of Project Brief which contains clear and achievable sustainability objectives	Review and update of project Sustainability Strategy and definition of specific actions for contractors to ensure delivery	Project team	

	Project Stage	RIBA Description of Key Tasks	Sustainable Key Objectives	Task list for Helical's appointed project manager	Responsibility
Preconstruction	Production Information	Preparation of further information for construction required under the building contract. Review of information provided by specialists	Use of Project Sustainability Checklist and other information to deliver sustainability objectives	Review information from technical specialists and preparation of necessary construction management plans e.g. ecology, landscaping	Project team
				Issue Project Sustainability Checklist to project team to oversee delivery of sustainability objectives	Project team
				Secure relevant licences and approvals	Project team
Construction	Construction to Practical Completion	Administration of the building contract to practical completion	Provision of sustainability support and guidance to project team	Monitor adherence to sustainability contract conditions on regular basis	Helical/ Project team
		Provision to the contractor of further information as and when reasonably required		Provide training to construction team and contractors as appropriate	Project team
		Review of information provided by contractors and specialists		Monitor and analyse performance data collated through Project Sustainability Checklist	Helical/ Project team/RPS
Use	Management	Ensuring that building design intent translates into performance	Ensure sustainable building is functioning as per design intent	Set sustainability performance targets for building to reflect design intent	Helical/ RPS
				Monitor sustainability performance of building against targets as part of annual reporting programme	Helical/ RPS

Environmental checklist included as part of due diligence procedures

Responsibility

- Acquisition Surveyor &/or Project Manager

Timing

- Prior to exchanging contracts on any property (or company) acquisition.

Procedure

As part of the due diligence procedure for all property (or company) purchases, the environmental risks included in this checklist should be assessed and reported on to the Helical Board. The appropriate use of the checklist should ensure that properties (and companies) that are being acquired do not present any unreasonable and unforeseen environmental risks and liabilities, and that once acquired they are kept in a 'ready-for-sale' condition. When the checklist has been completed it should be signed off by the project manager.

Checklist

The following environmental issues should be investigated as part of the acquisition due diligence process:

- Energy
 - The current Energy Performance Certificate (EPC) should be sourced to establish the current baseline performance of the property. This should be in addition to the current energy supplier and consumption information.
- Land contamination
 - A landmark survey should be undertaken to identify historical uses of the site and determine whether contaminated land investigation is required. If more detailed investigations are required, approved consultants should be appointed to undertake soil sampling and/or borehole surveys. The final contamination report produced should be forwarded to the relevant project manager before formal commitment is made to acquire the property.
 - Note: tax relief may be available for any remedial or monitoring costs should the property be acquired.
- Hazardous and deleterious materials
 - Building fabric and services surveys should be undertaken to identify any potentially harmful or hazardous materials. These must ultimately be safely removed and disposed of in accordance with regulations covering Duty of Care for Waste and the Special Waste Regulations. Particular care should be taken to identify:
- Asbestos
- Polychlorinated bi-phenyls (highly toxic substances found as coolants and impregnates in transformers, capacitors and similar equipment).

- Refrigerant gases and foams (often used in air conditioning, refrigeration and fire protection systems) - e.g. CFCs and HCFCs.
- Ecological and archaeological assessment
 - An assessment should be made as to whether the site might be home to any rare or endangered species of flora or fauna. If in doubt, consult with a Local Wildlife Group or the appropriate department in the local planning authority. If development is likely to take place at the site, actions need to be identified to alleviate any harm to these habitats and species. Similar precautions should be applied to both landscape and archaeology/natural heritage on or around the site.
- Flooding risk
 - If the site is located in an area that is prone to potential flooding, this should be identified and reported to the Project Manager, due to the potential increase in insurance premiums. In addition, underground streams should be identified and located, along with the source and destination of the stream. The site should be scrutinised for its potential adaptability to future climate which could include increased exposure to flooding and harsh winter and summer temperatures and extreme weather conditions.
- Good practice
- Additional elements that should be investigated include:
 - Information on the original base specification of the building
 - A full set of the original plans for the building
 - Existence of a BREEAM rating for any existing buildings on site
 - Full health and safety audit of the building (e.g. CDM manuals, etc)
 - Compliance with the Disabled Discrimination Act

Management Review process

1. To conduct the annual EMS management review, the Sustainability Executive will compile information related to the performance of the EMS from the current year and present it to the Sustainability Committee and where appropriate The Board. This information will include, but is not be limited to:
 - The processes used to determine Helical's aspects, significant aspects, legal and other requirements, and objectives and targets;
 - The level of success towards achieving the objectives and targets;
 - Previous discussions with members of the Committee relative to the success and direction of the EMS;
 - 'After' action reports from environmental incidents and any other communications from external interested parties;
 - Changing circumstances that could affect the scope of the EMS; and
 - Recommendations for improvement.
2. During the review, the Sustainability Executive will address the following questions, and others that may arise, to assess the suitability, adequacy, and effectiveness of the EMS and develop improvement recommendations (as necessary) in the following areas:
 - Are the processes used to determine the aspects, significant aspects, legal and other requirements, and objectives and targets sufficient relative to Helical's environmental policy and its activities?
 - Have the Environmental Management Programs (EMPs) which underpin the targets been properly developed, maintained, and resourced to ensure the successful completion of the objectives and targets?
 - Is the level of internal and external communication sufficient to achieve the desired level of environmental awareness and participation?
 - Has there been any environmental legal non-compliances?
3. During the EMS Management Review the Committee will consider the information presented; ask any clarifications necessary to determine the suitability, adequacy, sustainability and effectiveness of the EMS; and make recommendations they feel are necessary to ensure the system achieves the desired level of environmental performance. Completion of the EMS Management Review will be documented in the minutes of the meeting.
4. If the nature of the Committee's recommendations / action items requires that corrective and preventative action be taken, the Sustainability Executive will provide periodic updates on the status of the recommendations / action items to the Committee until they are completed.

Performance measurement procedure for managed portfolio

Responsibility

Investment Managers (internal)

Managing Agents (external)

Timing

Quarterly reports to be issued by managing agents to RPS.

Procedure

The Excel spreadsheet tool is hosted on a Microsoft teams site where the Managing Agents for each site has access to. The facility managers responsible for the day to day management of the multi-let properties in the portfolio have access to the Teams Site and spreadsheet. Agents should enter the data specified in the spreadsheet into the appropriate cells, and issue the completed information back to Helical on specified quarterly dates. This information will be collated and analysed by RPS in order to ensure that it can be reported on to external stakeholders and to enable the setting of performance related targets in future. The same tool should be used to capture information on the environmental impacts arising from Helical's occupation of 5 Hanover Square, London.

Performance Measurement tool

The tool is an Excel spreadsheet which specifies the relevant information to be captured across different property types.

Legal and Other Obligations Compliance Checklist

Responsibility

Investment Managers (internal)

Managing Agents (external)

Timing

Legal compliance checklist to be completed annually by managing agents by 31st March each year. Prior to this RPS will undertake an annual review of the checklist to ensure legal requirements are current. Facilities managers to also undertake quarterly checks.

Procedure

The Legal compliance checklist should be issued by Helical to management agents responsible for the day to day management of the multi-let properties in the portfolio. Helical should assess legal compliance against the requirements. This information will be reviewed by RPS in order to ensure that it can be reported on to external stakeholders.

Contractors' Sustainability Checklist

Responsibility

Investment Managers (internal)

Contractors Site Managers (external)

Timing

Site reports to be issued by Contractors' Site Managers to RPS.

Procedure

The Contractors' checklist should be issued by Helical to all Site Managers responsible for the day to day management of development contracts undertaken on behalf of Helical above £500,000 contract value. Site Managers should enter the data specified in the checklist, and issue the completed information back to Helical on specified meeting dates. This information will be collated and analysed by RPS in order to ensure that it can be reported on to external stakeholders and to enable the setting of performance related targets.