

ENVIRONMENTAL POLICY

Revision history

[illegible]

1 Purpose

The purpose of this policy is:

- to set out City & Guilds Limited's policy relating to minimising the environmental impacts of our business operations
- in common with all the City & Guilds Limited's policies, to provide clarity and consistency, to reflect good governance and best practice, and to enhance risk management and time/cost control.

2 Terms used in this policy and their meanings

City & Guilds Limited	City & Guilds Limited and any company directly or indirectly owned or controlled by it
group member	City & Guilds Limited or any company directly or indirectly owned or controlled by it
group employee	a person who is employed by a group member
Policy Owner	Chief Strategy & Finance Officer
Responsible Business Team	a team made up of employees including: • Chief Strategy & Finance Officer • Chief Customer Officer • Chief Brand & Communications Officer • Executive Director of Marketing & Customer Insight • Executive Director of People • Director of Commercial Operations • Director of Products • Strategy and Investment Manager • Responsible Business Lead
Constitutional	relating to or covered by the constitution of any group member
Compliance	relating to or covered by any type of law (for example tax, education, charity, contract, company, employment, competition)
SEP	a specific environmental policy or similar document adopted by one or more group members. At the date of this policy the SEPs are:

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- the Environmental Policy Statement of GenII Engineering and Technology Training Ltd
- the Environmental and Sustainability Policy of Intertrain UK Ltd

Environmental Law statutory law (including regulations) and case law relating to the environment

3 **Scope and related policies**

- 3.1 This policy applies to City & Guilds Limited and all other members of the City & Guilds Limited group:
- where the relevant law is that of England & Wales
 - where the relevant law is that of another country (A), unless and to the extent that A's law imposes more stringent requirements, in which case A's law applies.
- 3.2 This policy does not affect:
- who bears the external and internal costs relating to SEPs
 - any other provisions in an SEP except that if an SEP provision conflicts with a provision in this policy the latter shall prevail, unless the Policy Owner agrees otherwise.
- 3.3 This policy is one of several policies which are part of City & Guilds Limited's Responsible Business Policy.

4 **Constitutional and compliance aspects**

4.1 Constitution

City & Guilds Limited's constitution does not contain any provisions about Environmental Law. It is rare for a company's constitution to do so: it is not however impossible so the constitutions of other group members should be checked and if there are any such provisions the group member in question must comply with them.

4.2 Compliance

4.2.1 In the UK:

4.2.1.1 Statutory Environmental Law includes law relating to the following:

- contaminated land
- water pollution and water discharges

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- waste
- asbestos
- carbon and other greenhouse gases
- energy saving assessments
- energy efficiency in buildings and ecodesign of products and labelling
- biodiversity, habitats and wildlife
- chemicals.

4.2.1.2 Private nuisance claims arise under common law where (1) a person's activities cause substantial and unreasonable damage to the neighbouring land and (2) the damage was reasonably foreseeable and (3) the activity causing the damage is unreasonable (even though it may be lawful)..

4.2.1.3 The directors of a company are required to have regard (among other matters) to the impact of its operations on the environment.

4.2.1.4 Parent companies may owe a duty of care to the employees of their subsidiaries in relation to health and safety matters and the courts have considered in recent cases the extent to which they could owe a similar duty of care to those affected by the environmental impacts of their subsidiaries' operations.

4.2.2 Environmental Law in other countries is country-specific and may or may not be similar to that of the UK.

5 Policy

It is City & Guilds Limited's policy:

5.1 in relation to our own activities:

- to comply with Environmental Law in the countries in which we operate
- to continuously monitor and improve our environmental performance
- to take action to reduce the carbon footprint of our business operations to meet our target to achieve Net Zero emissions by 2040
- to commit to initiatives that promote greater environmental responsibility such as:
 - reduction of our consumption of resources
 - responsible waste management including reduction, re-use and recycling

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- effective management of the delivery of goods and resources
- to manage our business operations to protect the natural environment and reduce pollution.

5.2 to expect our suppliers:

- to comply with Environmental Law in the countries in which they operate, and to accept a contractual obligation to do so
- to aspire to our standards including but not limited to undertaking initiatives to promote greater environmental responsibility such as responsible waste management and disposal, reduction of greenhouse gas and other emissions harmful to the environment (and thereby support our aim to achieve Net Zero emissions by 2040), and conservation of non-renewable natural resources.

6 Procedure

6.1 Monitoring environmental performance

Environmental performance is monitored jointly by the Group Property Manager and the Responsible Business Lead.

6.2 Compliance with this policy

Issues relating to compliance with this policy should be reported to the Director of Commercial Operations or the Responsible Business Lead who will inform each other and work together to resolve them.

6.3 Internal reporting

Issues relating to compliance with this policy are reported to the Policy Owner by the Responsible Business Lead. If the Policy Owner considers them to be sufficiently significant, they will escalate them to the Executive Leadership Team with recommendations for the action which should be taken. In both cases the reports are cleared with the Group Property Manager before submission.

6.4 External reporting and disclosures

6.4.1 Mandatory reports and disclosures

The Group Property Manager is responsible for:

- preparing mandatory environmental reports and disclosures, with input from the Responsible Business Lead
- clearing the final versions with the Responsible Business Lead and the Policy Owner; and
- publishing them.

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6.4.2 Voluntary reports and disclosures

The Responsible Business Lead is responsible for:

- preparing voluntary environmental reports and disclosures, with input from the Group Property Manager
- clearing the final versions with the Director of Commercial Operations and the Policy Owner; and
- publishing them.

7 Funding

External and internal costs are borne as follows:

- 7.1 by City & Guilds Limited if they relate to the content of this policy (for example external advice on compliance aspects). The costs may be shared with other group members in accordance with the cross-charging principles applicable at the time
- 7.2 by the group member concerned if they relate to compliance with this policy.

8 General provisions

- 8.1 This policy and any amendments to it are approved by the Policy Owner.
- 8.2 The Policy Owner is responsible for:
- reviewing this policy every three (3) years (or more often if necessary) with advice from Legal and if necessary or desirable in consultation with relevant stakeholders. Suggestions to be taken into account in the next review are welcome and should be sent to the Responsible Business Lead
 - promoting awareness of this policy.
- 8.3 All group employees must comply with this policy, and managers are also responsible for ensuring that their teams are aware of and comply with it.
- 8.4 Queries about this policy should be sent to the Responsible Business Lead. Any queries which relate to paragraph 7 (funding) will be referred to Legal (who will consult Finance and/or or Chief Strategy & Finance Officer if appropriate).

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