

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Environmental and Sustainability Policy</h2>	POL018/02/1220
		Last Reviewed: 03/2024
		Page 1 of 2
		Owner: David Hopley

1 Policy Statement

Millbank Holdings Ltd and its subsidiaries recognise the importance of reducing as much as possible its impact on the environment in its day-to-day practice and recognise that environmental sustainability management is integral to developing a sustainable business.

Millbank Holdings Ltd and its subsidiaries are committed to promoting sustainability.

We aim to follow and promote good sustainability practice, to reduce the environmental impacts of all our activities and to work with our clients and partners to do the same.

We are committed to accountability and transparency in our sustainability performance by complying with the following principles.

Principles

- As a minimum comply with all relevant environmental legislation, code of practice and regulations at International, National and Local level;
- Identify any Company environmental impact and act to prevent pollution at source;
- Take positive steps to conserve scarce and non-renewable resources.
- Take positive steps including assisting our customers in preventing pollution.
- Purchase from environmentally friendly suppliers.
- Reduce the use of water, energy and any other natural resources.
- Reducing the impact of procurement by considering alternatives to acquiring the resource by, for example, reducing the rate of consumption of consumables and reusing, repairing or modifying existing equipment;
- Provide appropriate information, instruction, training and supervision to enable employees and contractors to implement the company's environmental and sustainability policy and arrangements.
- Establish a framework of environmental objectives and targets with the aim of achieving continual improvement.
- Ensure that emergency procedures are in place at all locations for dealing with environmental issues.
- Purchasing made from sustainable, renewable, reused or recycled materials, which help to conserve resources and minimise waste.
- Integrating good environmental practice into our buying decisions

2 Practical steps

In order to put these principles into practice we will:

- Develop efficient electronic administration processes to move away from paper-based systems. Where paper records are required, we print with returnable-cartridge printing ink on recycled or chain of custody certified paper.
- Pay our supply chain promptly.
- Where possible provide Local labor to reduce travel time and emissions.
- Procure materials from recognised responsible sourcing schemes
 - Avoid physically travelling to meetings etc. where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and efficient timing of meetings to

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		Page 2 of 2
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avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients.

- Reduce the need for our employees or contractors to travel by supporting alternative working arrangements, including home working etc., and promote the use of public transport.
- Minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste.
- As far as possible arrange for the reuse or recycling of office and site waste, including paper, computer supplies, redundant materials and equipment.
- Reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping.
- Seek to purchase equipment and materials from a supplier committed to renewable energy.
- Align our charitable giving with the Company's activities and actively encourage our people to get involved in charity work.
- Communicate and brief this policy to all employees and contractors and other stakeholders
- Promote safety and well-being amongst all employees and contractors
- Provide support to employees and contractors and their families, during times of serious illness

3 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

David Hopley

Title: Managing Director

Date: March 2024

Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.