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GROUP

BOURNE GROUP

SUSTAINABILITY MANAGEMENT PLAN

ANNUAL REPORT 2022-23

Contents

1. PROCUREMENT AND SUPPLIER MANAGEMENT

- Establish a documented management system for the purchasing process and approval of suppliers that references the Bourne Responsible Sourcing Policy and the principles of responsible sourcing.
- Maintain a list of approved suppliers of steel and where materials are acquired from any supplier based outside the UK, EU, or from states that have not declared adherence to the OECD Guidelines for Multinational Enterprises, undertake an appropriate risk assessment and demonstrate due diligence.
- Demonstrate procurement processes and function are in line with the principles for sustainable procurement (as set out in ISO 20400) and publish a Code of Conduct for all suppliers.
- Demonstrate engagement with the material supply chain on the principles of responsible sourcing.
- Establish a documented risk assessment and undertake due diligence in relation to the potential for environmental and social risks, and review at regular intervals.

Target:
Review all purchasing and supply chain management procedures, to include: • Review and update BGL PM 4.00 Purchasing procedure. • Review all BGL 400 forms. • Review and update supplier Code of Conduct. • Roll out and implement Sustainability Supply Chain School membership to key supply chain members. • Introduce stipulation for key supply chain members to have externally verified Science Based Targets. • Implement sustainability and responsible sourcing KPIs that are regularly reviewed. • Update BGL 412a Supplier Questionnaire onsite and BGL 412b Supplier Questionnaire forms to include all the above points.

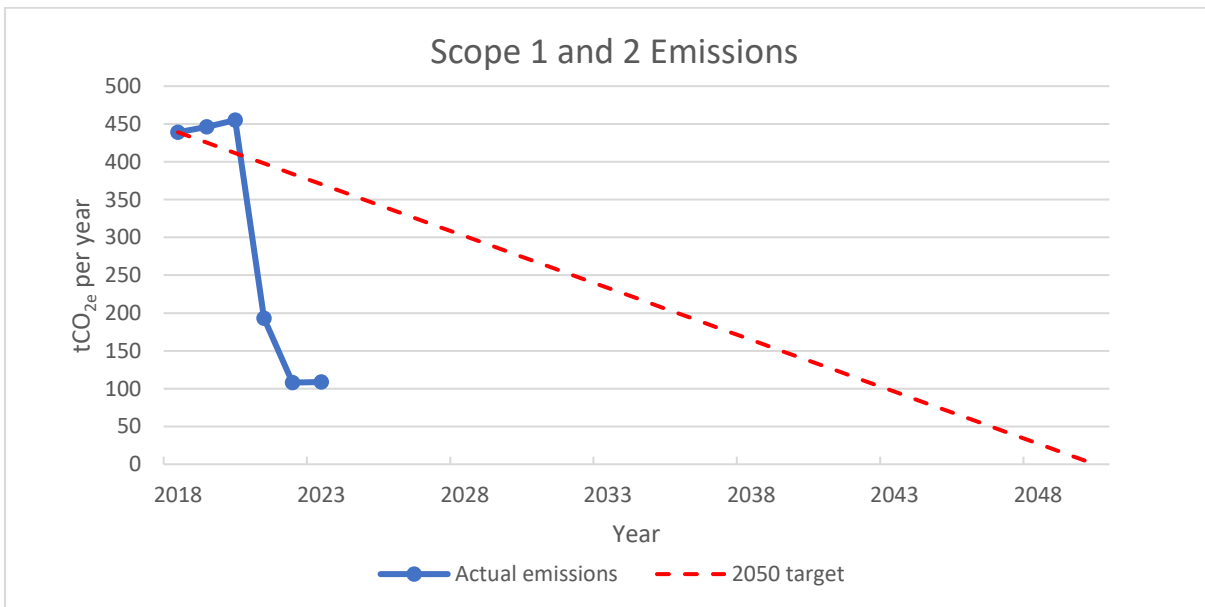| Report: |
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| Bourne Group procurement procedure BGL PM 4.00 has been updated and all other procedures reviewed. All associated BGL 400 forms have been reviewed and updated where necessary (including order particulars).

Bourne Group have engaged with key members of the supply chain to get them involved and participate as a Sustainability Supply Chain School member. To date, six supply chain members have joined the school.

Bourne Group have had their emissions reduction targets approved by the Science Based Targets initiative but have not yet stipulated that this is to be introduced within the supply chain. |

2. GREENHOUSE GAS EMISSIONS

- Quantify Scope 1 and Scope 2 GHG emissions associated with operations.
- Identify and quantify significant sources of Scope 3 emissions associated with operations.
- Set targets for the reduction of direct and indirect greenhouse gas emissions, relative to output over time.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Report performance against targets to stakeholders.
- Obtain external verification of GHG information and data.

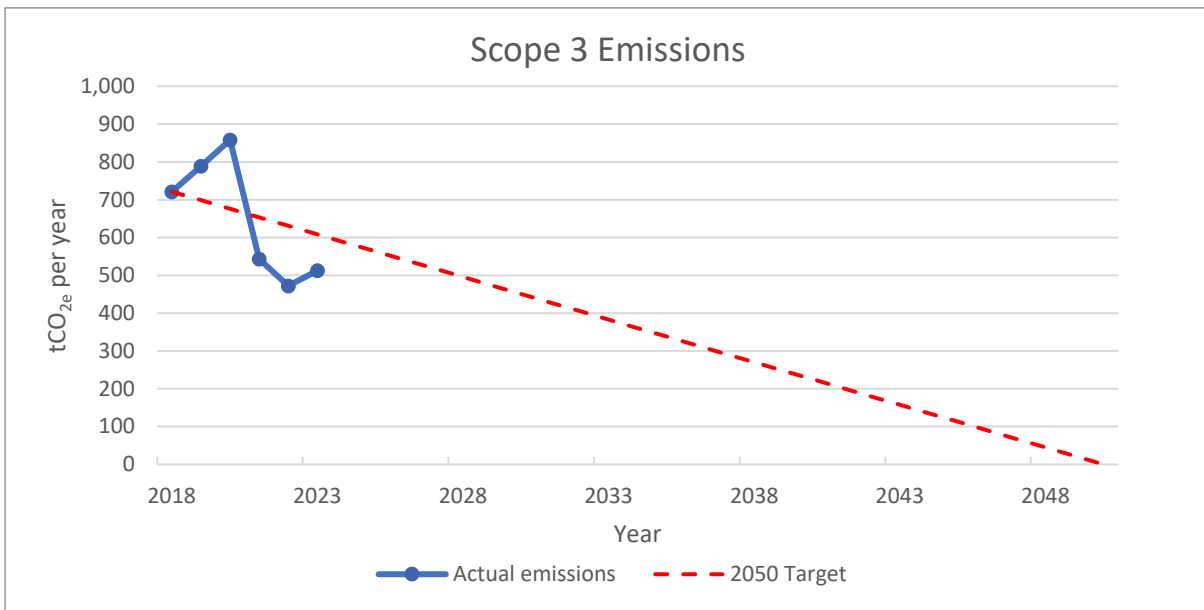| Target: |
| --- |
| In accordance with the published BGL Carbon Reduction Plan, reduce Scope 1 and 2 GHG emissions by at least 50% by 2025 against a 2018 baseline. Obtain external verification and approval of GHG emissions reduction targets by the Science Based Targets initiative, as consistent with levels required to meet the goals of the Paris Agreement. |

Year	Scope 1	Scope 2	Total
2018	128	311	439
2019	146	300	446
2020	165	290	455
2021	91	102	193
2022	104	4	108
2023	105	4	109

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Target:
Identify significant sources of Scope 3 GHG emissions and reduce total carbon emissions by at least 50% by 2025 against a 2018 baseline.

Year	Scope 3
2018	721
2019	789
2020	858
2021	543
2022	472
2023	513

Report:

Overall, there has been ~75% reduction in Scope 1 and 2 GHG emissions and a ~29% reduction in Scope 3 emissions from a 2018 benchmark (currently on target to achieve at least 50% reduction by 2025).

Science-based targets are emissions reduction targets in line with what the latest climate science says is needed to meet goals of the Paris Agreement – to limit global warming to well-below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C.

Science-based targets tell us how much and how quickly we need to reduce our greenhouse gas emissions in order to be consistent with keeping warming below the most dangerous levels.

The Science Based Targets initiative (SBTi) is a collaboration between CDP, the United Nations Global Compact, World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). The SBTi defines and promotes best practice in science-based target setting and independently assesses companies' targets.

Bourne Group have had their emissions reduction targets approved by the Science Based Targets initiative as consistent with levels required to meet the goals of the Paris Agreement. The targets covering greenhouse gas emissions from Bourne Group's operations (Scope 1 and 2) are consistent with reductions required to keep warming to 1.5°C, the most ambitious goal of the Paris Agreement.

3. ENERGY USAGE - GAS

- Set targets for the reduction of energy usage, relative to output over time.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Report performance against targets to stakeholders including levels of energy usage relative to output over time, and thereafter reported annually.
- Obtain external verification of the energy information and data reported.
- Develop and implement an action plan for the continual reduction of use of energy from fossil fuels and for the increase of energy from renewable energy sources.

Target:
Reduce intensity of gas usage within St Clements and factory <u>per m^2 building area</u> by 1% each year using 2013 figures as a benchmark.

| Year	Gas Usage (kW hrs)	Gas Intensity (kW hrs per m^2 building area)	Performance
2013	1,147,812	169	
2014	835,353	123	~27% reduction in usage
2015	698,712	103	~16% reduction in usage
2016	1,043,656	153	~49% increase in usage
2017	786,986	116	~24% reduction in usage
2018	594,426	87	~25% reduction in usage
2019	548,426	81	~7% reduction in usage
2020	880,003	129	~59% increase in usage
2021	420,844	62	~52% reduction in usage
2022	414,610	61	~2% reduction in usage
2023	444,953	65	~7% increase in usage
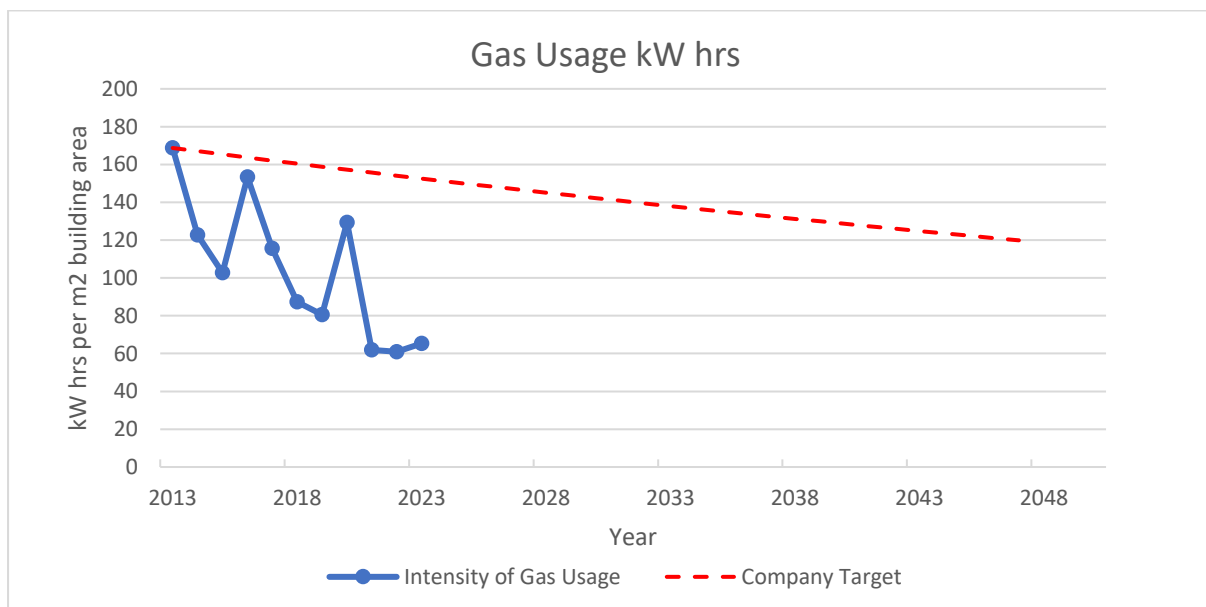
Report:
Overall, there has been ~62% reduction in the intensity of gas usage per m^2 building area from a 2013 benchmark so target expectations of 1% reduction per year are being exceeded (combined target for 2023 since benchmark is 10% reduction). Bourne Group remain committed to using 100% renewable gas.

Target:
Reduce intensity of gas usage within St Clements and factory <u>per tonne of steel</u> by 1% each year using 2021 figures as a benchmark.

Year	Gas Usage (kW hrs)	Gas Intensity (kW hrs per tonne)	Performance
2021	420,844	76.1	
2022	414,610	111.8	~47% increase in intensity
2023	444,953	99.9	~11% reduction in intensity
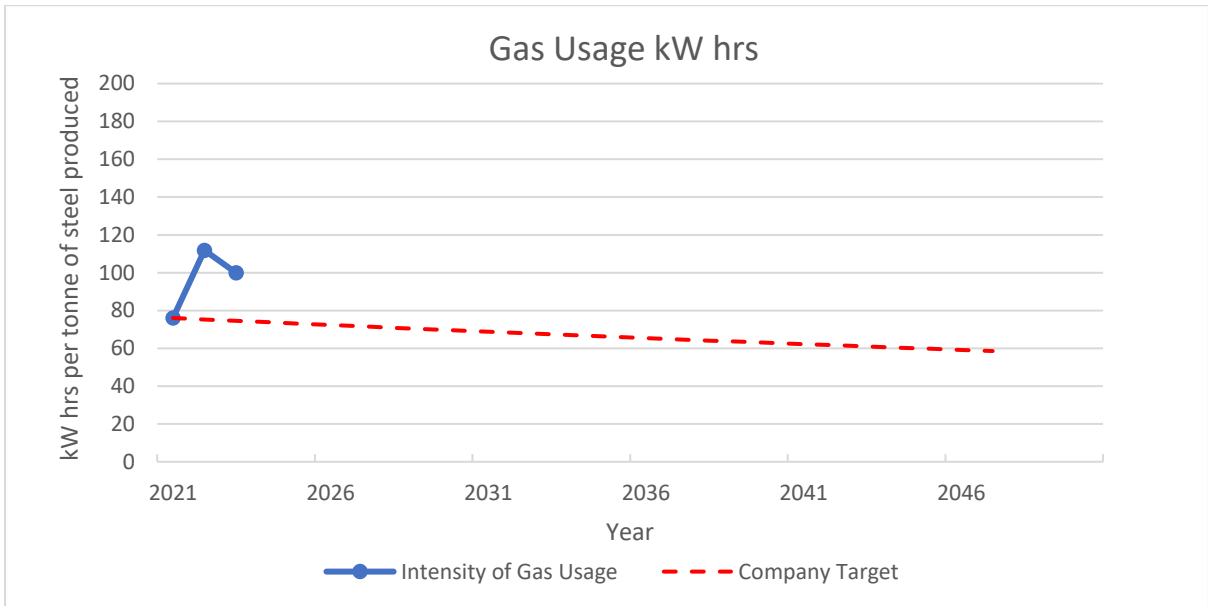
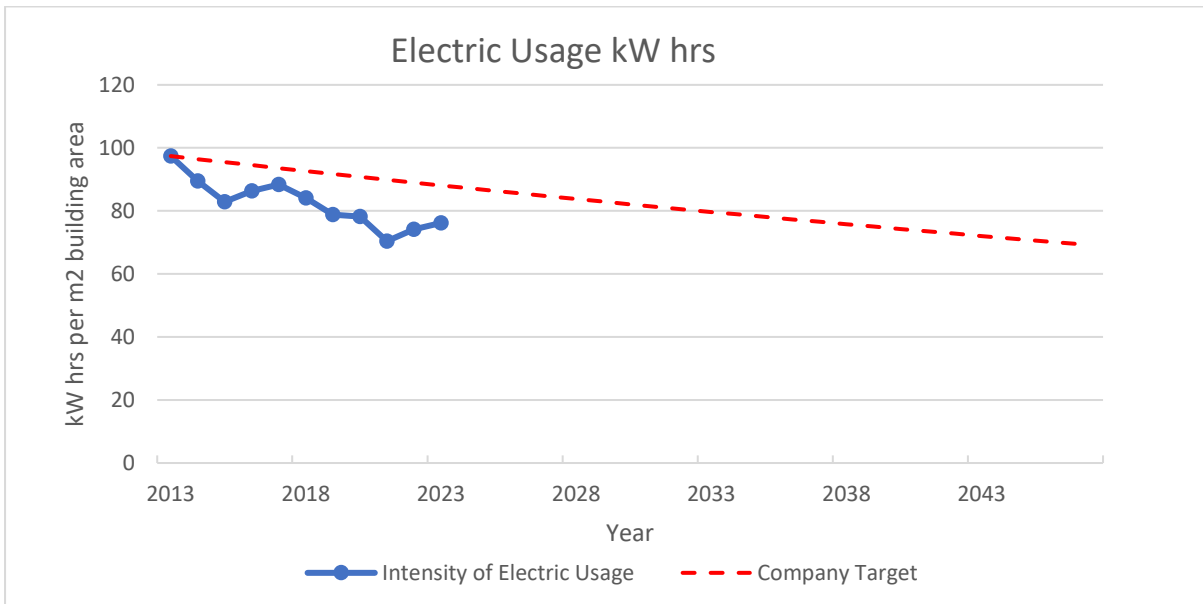| Report: |
|---|
| Overall, there has been ~31% increase in gas intensity per tonne of steel produced from a 2021 benchmark so target expectations of 1% reduction per year are not being achieved (combined target for 2023 since benchmark is 2% reduction). |
| Bourne Group remain committed to using 100% renewable gas. |

4. ENERGY USAGE – ELECTRICITY

- Set targets for the reduction of energy usage, relative to output over time.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Report performance against targets to stakeholders including levels of energy usage relative to output over time, and thereafter reported annually.
- Obtain external verification of the energy information and data reported.
- Develop and implement an action plan for the continual reduction of use of energy from fossil fuels and for the increase of energy from renewable energy sources.

Target:
Reduce intensity of electricity usage within St Clements and factory <u>per m² building area</u> by 1% each year using 2013 figures as a benchmark.

Reduce intensity of electricity usage within St Clements and factory per m² building area by 1% each year using 2013 figures as a benchmark.

| Year	Electricity Usage (kW hrs)	Electricity Intensity (kW hrs per m^2 building area)	Performance
2013	662,657	97	
2014	608,407	89	~8% reduction in usage
2015	563,582	83	~7% reduction in usage
2016	587,125	86	~4% increase in usage
2017	601,034	88	~2% increase in usage
2018	571,774	84	~5% reduction in usage
2019	536,500	79	~6% reduction in usage
2020	531,830	78	~1% reduction in usage
2021	478,953	70	~10% reduction in usage
2022	504,091	74	~6% increase in usage
2023	518,298	76	~3% increase in usage

Report:
Overall, there has been ~22% reduction in the intensity of electricity usage per m^2 building area from a 2013 benchmark so target expectations of 1% reduction per year are being achieved (combined target for 2023 since benchmark is 10% reduction).   Bourne Group remain committed to using 100% renewable electricity.

Target:
Reduce intensity of electricity usage within St Clements and factory <u>per tonne of steel</u> by 1% each year using 2021 figures as a benchmark.

Year	Electricity Usage (kW hrs)	Electricity Intensity (kW hrs per tonne)	Performance
2021	478,953	87	
2022	504,091	136	~56% increase in intensity
2023	518,298	116.4	~14% reduction in intensity

Electric Usage kW hrs
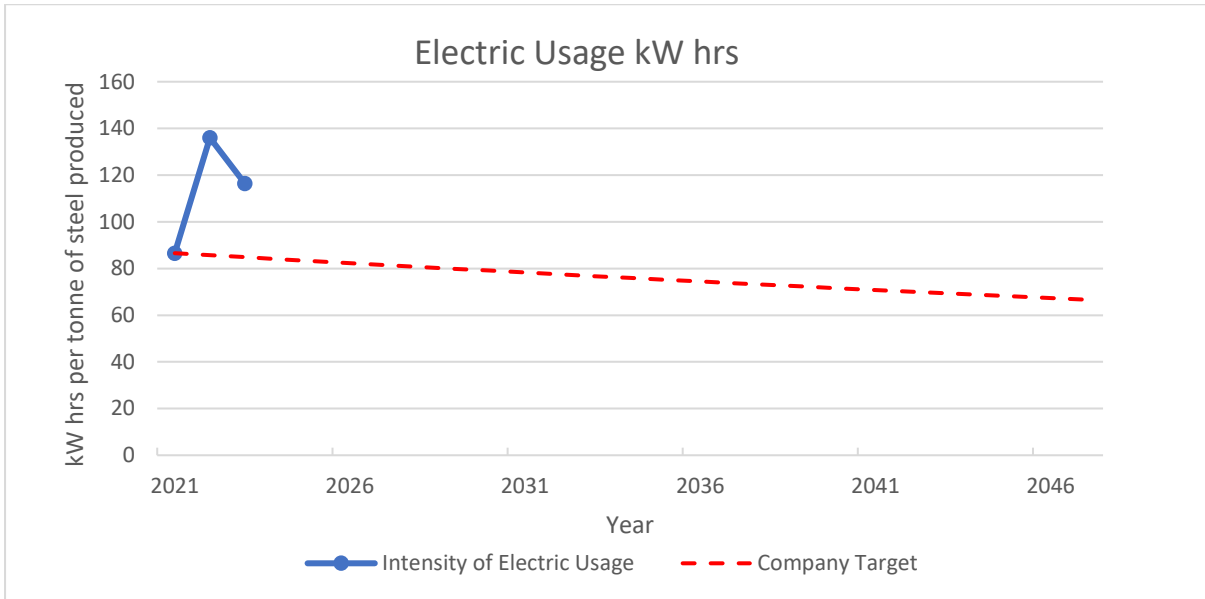
Report:
Overall, there has been ~34% increase in the electricity intensity per tonne of steel produced from a 2021 benchmark so target expectations of 1% reduction per year are not being achieved (combined target for 2023 since benchmark is 3% reduction).
Bourne Group remain committed to using 100% renewable gas.

5. RESOURCE USE AND PRODUCT CIRCULARITY

- Establish a policy, supported by a documented management system, for the efficient use of constituent materials and for the assessment of its products' circularity.
- Demonstrate at least two of the following and report to stakeholders on the performance:
  - Encourage future resource use of the steel at end-of-life.
  - Actions to extend the lifespan of the steel.
  - Declaration of recycled content of steel.
  - A product development approach to design products for a circular economy.
- Obtain external verification of its resource use and product circularity information and data.

Target:
Utilise a Carbon Calculator for all project works, to include levels of embodied carbon for all products and materials and the recycled content of steel. Develop a user guide for the Carbon Calculator. Create project profile template detailing carbon savings offered and carbon savings gained.

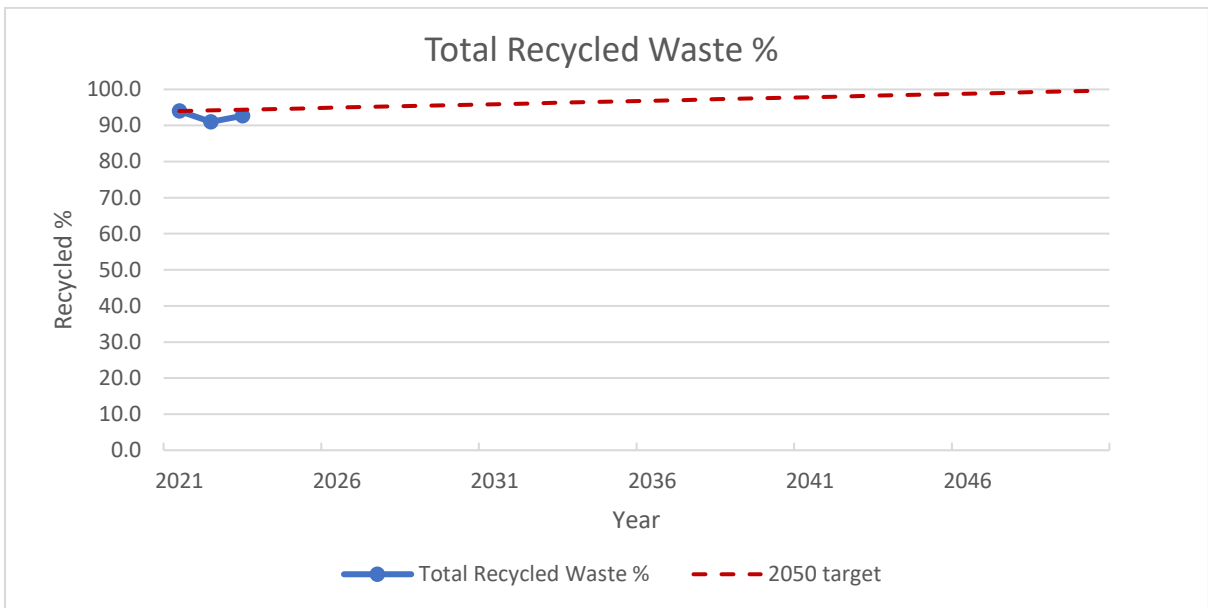| Report: |
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| Bourne Group have implemented a Carbon Calculator based on the principals of the structural carbon tool issued by the Institution of Structural Engineers, together with a detailed user guide.

The Carbon Calculator is being used throughout the business and has allowed us to:

• Calculate the amount of carbon in different elements of the design.
• Identify carbon hotspots and opportunities to target for material reduction.
• Understand the differences between structural options.
• Communicate decision-making impacts with the design team. |

6. WASTE PREVENTION AND WASTE MANAGEMENT

- Set targets for the reduction of waste and for the diversion of waste from landfill or incineration without energy recovery.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Organisation to report performance against targets to stakeholders including levels of waste production to output set against targets for reduction over time, and thereafter reported annually.
- Compare to industry benchmarks where available or to company benchmarks if industry benchmarks not available.
- Obtain external verification of the information and data reported.

Target:
Increase the total waste recycled per tonne of waste produced by 0.2% each year using 2021 figures as a benchmark.

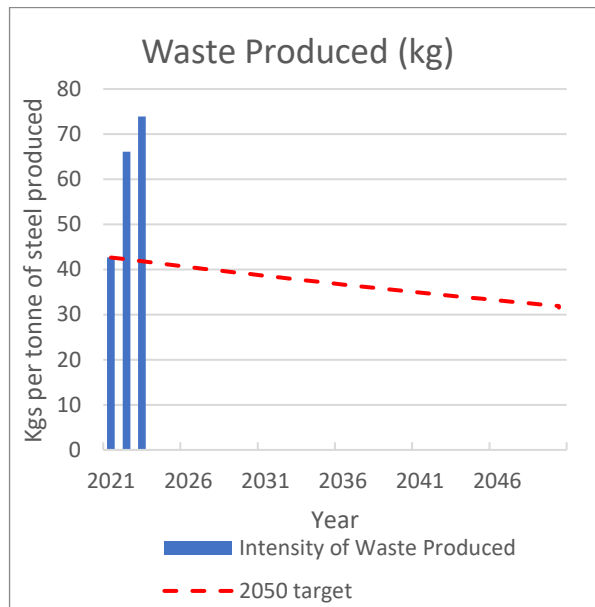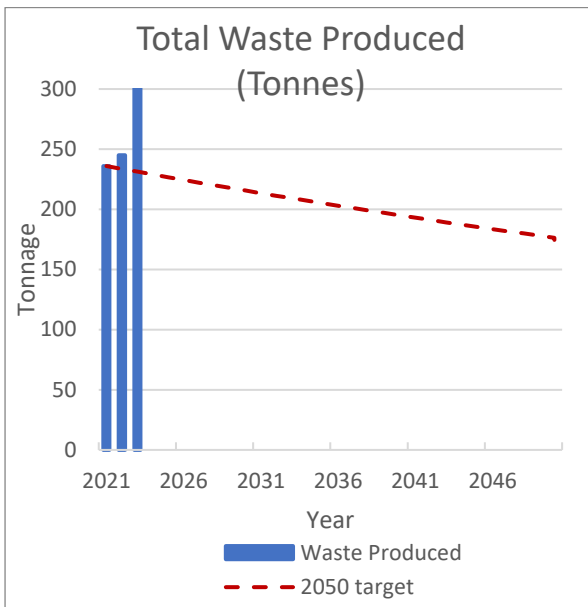| Year	Total Waste Produced (tonnes)	Total Waste Recycled (tonnes)	Total Waste Recycled (% of total waste produced)
2021	236	222	94
2022	245	222	91
2023	329	305	93

Report:
Overall, there has been 1% less in the total waste recycled (relative to the total waste produced) from a 2021 benchmark so target expectations of an increase in 0.2% per year have not been achieved (combined target for 2023 since benchmark is 0.4% increase).

Target:
Reduce the total amount of waste to landfill or incineration without energy recovery (produced by St Clements and factory) per tonne of waste produced by 1% each year using 2021 figures as a benchmark. Reduce the intensity of waste produced within St Clements and factory _per tonne of steel_ by 1% each year using 2021 figures as a benchmark.

Year	Total Waste Produced (tonnes)	Total Waste Intensity (Kgs per tonne)	Performance
2021	236	42.6	
2022	245	66	~55% increase in usage
2023	329	73.8	~12% increase in usage

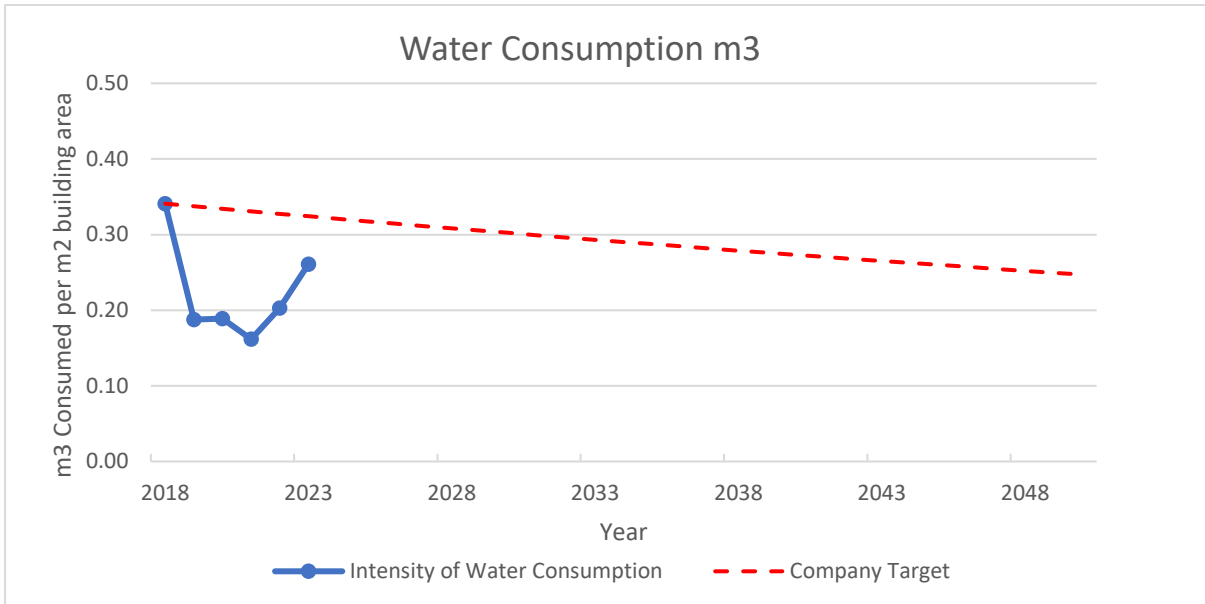| Report: |
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| Overall, there has been an increase of 3.1% in the total waste produced (relative to the total tonnes of steel produced) by St Clements and the factory from a 2021 benchmark so target expectations of reducing the amount of waste by 1% per year have not been achieved (combined target for 2023 since benchmark is 2% reduction).

Overall, there has been ~73% increase in the total waste intensity per kg of steel produced from a 2021 benchmark so target expectations of 1% reduction per year are not yet being achieved (combined target for 2023 since benchmark is 2% reduction). |

7. WATER USAGE

- Quantify the intensity of water usage associated with operations.
- Set targets for the reduction of the intensity of water usage, relative to output over time.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Report performance against targets to stakeholders including the intensity of water usage.
- Obtain external verification of the information and data reported.

Target:
Reduce intensity of water usage within St Clements and factory per m^2 building area by 1% each year using 2018 figures as a benchmark.

| Year	Water Usage (m^3)	Performance
2018	2,319	
2019	1,275	~55% reduction in usage
2020	1,284	~1% increase in usage
2021	1,100	~14% reduction in usage
2022	1,381	~26% increase in usage
2023	1,774	~28% increase in usage

Report:
Overall, there has been ~24% reduction in water usage from a 2018 benchmark so target expectations of 3% reduction per year are being exceeded (combined target for 2023 since benchmark is 15%).

Target:
Reduce intensity of water usage within St Clements and factory <u>per tonne of steel</u> by 1% each year using 2021 figures as a benchmark.

Year	Water Usage (m^3)	Water Intensity (m^3 per tonne)	Performance
2021	1,100	0.20	
2022	1,381	0.37	~85% increase in intensity
2023	1,774	0.40	~8% increase in intensity
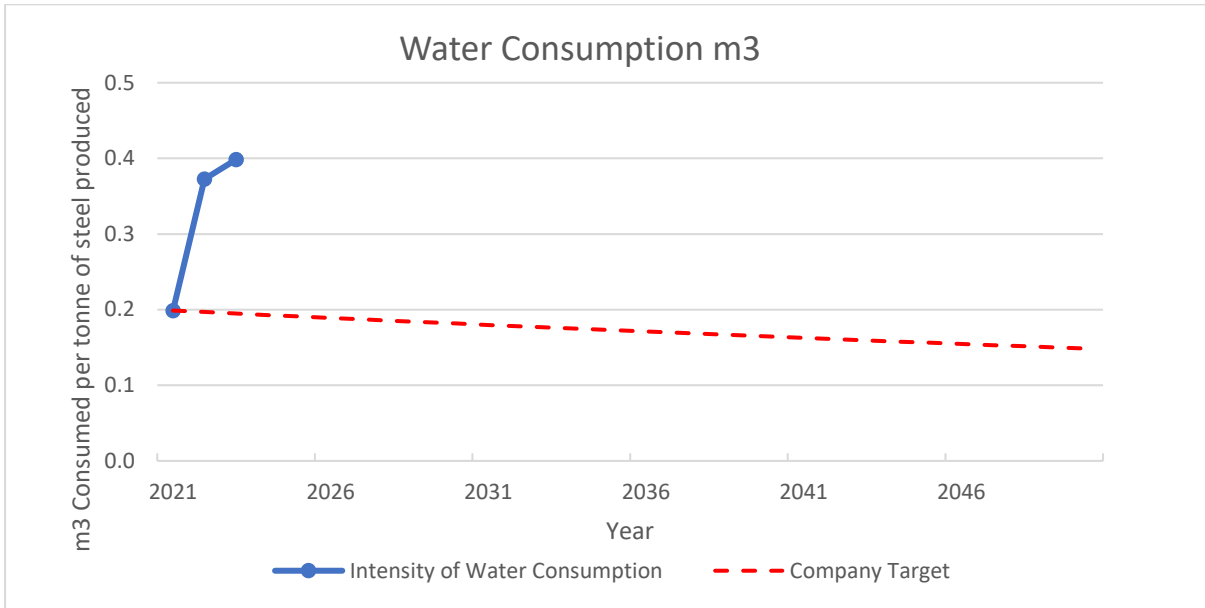
Report:
Overall, there has been ~100% increase in the water intensity per tonne of steel produced from a 2021 benchmark so target expectations of 1% reduction per year are not being achieved (combined target for 2023 since benchmark is 2% reduction).

8. LIFE CYCLE ASSESSMENT

- Provide an independently verified Environmental Product Declaration (EPD) that conforms to the requirements of ISO 14025 and either ISO 21930 or EN 15804 for the assessed product.

Target:
Create project profile template detailing carbon savings offered and carbon savings gained, to show life cycle thinking and to identify environmental aspects and impacts throughout the product lifecycle. Obtain and publish an independent EPD for the Bourne Group manufacturing facility.

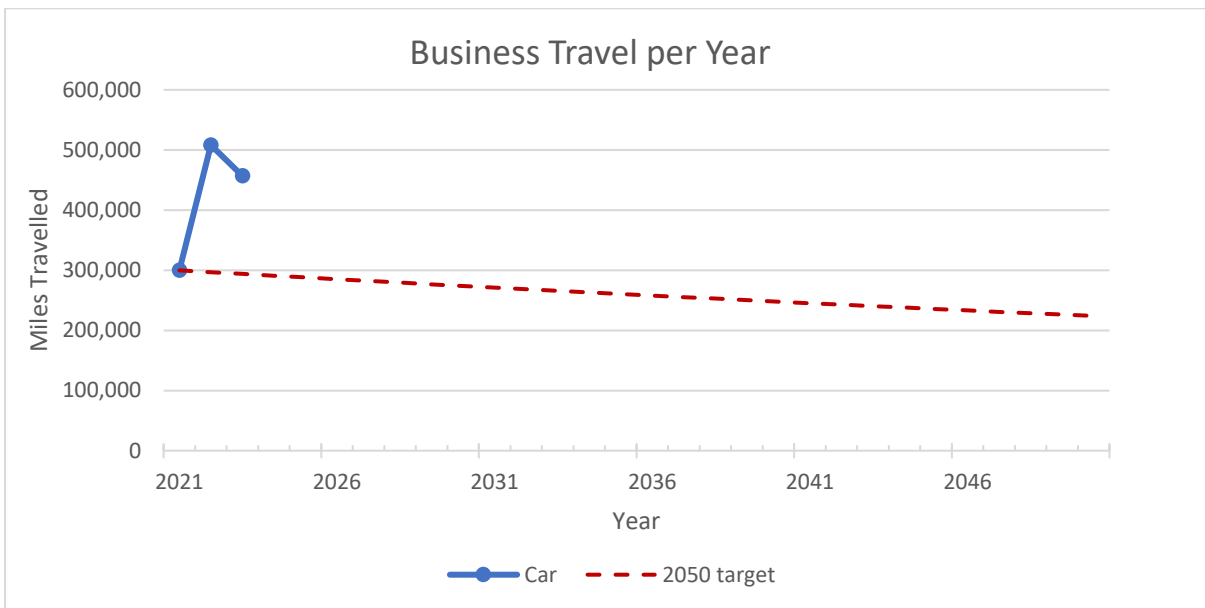| Report: |
|---|
| Bourne Group have implemented a Carbon Calculator based on the principals of the structural carbon tool issued by the Institution of Structural Engineers, together with a detailed user guide. The Carbon Calculator is being used throughout the business and has allowed us to: Estimate the amount of carbon in different parts of the design. Identify carbon hotspots and opportunities to target for material reduction. Understand rough differences between structural options. Communicate decision-making impacts with the design team. EPDs for Bourne Group suppliers and mills have been obtained (where applicable), however, no progress has been made with obtaining an independent EPD for the Bourne Group manufacturing facility. |

9. TRANSPORT IMPACTS

- Set targets for the reduction of environmental and social impacts associated with transport of steel, good and people involved in its operations.
- Targets to be approved by senior management and progress against targets reviewed regularly.
- Report transport use to stakeholders including significant environmental and social impacts and mitigation strategies.
- Extend scope of transport policy and procedures to cover the impacts of the transportation of steel.
- Report transport of steel to stakeholders including significant environmental and social impacts.

Target:
Reduce the total car business travel mileage (relative to total combined travel miles) by 1% each year using 2021 figures as a benchmark.

| Year	Total Combined Travel (miles)	Total Car Travel (miles)	Total Car Travel (%)
2021	348,800	299,900	86
2022	587,520	508,220	87
2023	493,600	456,940	93

Report:
Overall, there has been an increase of 7% in the total car business travel mileage from 2021 benchmark so target expectations of 1% reduction per year are not being achieved (combined target for 2023 since benchmark is 2% reduction).

Target:
Reduce the intensity of car business travel mileage <u>per tonne of steel</u> by 1% each year using 2021 figures as a benchmark.

Year	Total Car Travel (miles)	Car travel intensity (mile per tonne)	Performance
2021	299,900	54.2	
2022	508,220	137.1	~153% increase in intensity
2023	456,940	102.6	~35% reduction in intensity
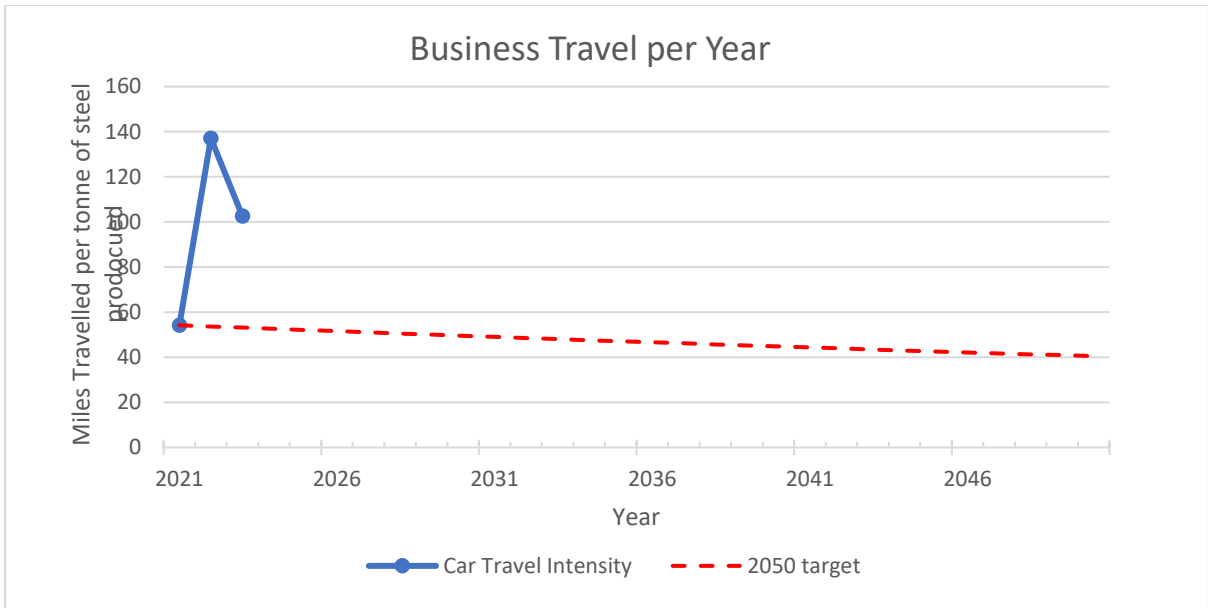
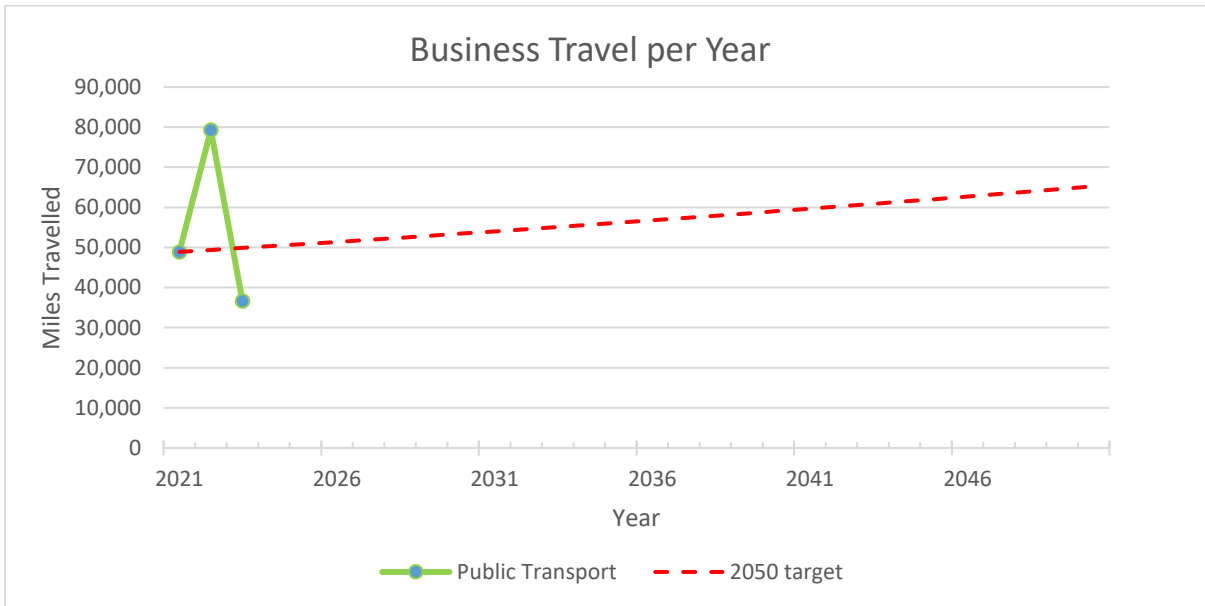| Report: |
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| Overall, there has been ~48% increase in car business travel intensity per tonne of steel produced from a 2021 benchmark so target expectations of 1% reduction per year are not being achieved (combined target for 2023 since benchmark is 2% reduction). |

Target:
Increase the amount of total public transport travel mileage (relative to total combined travel miles) by 1% each year using 2021 figures as a benchmark.

Year	Total Combined Travel (miles)	Total Public Transport Travel (miles)	Total Public Transport Travel (%)
2021	348,800	48,900	14
2022	587,520	79,300	13
2023	493,600	36,660	7

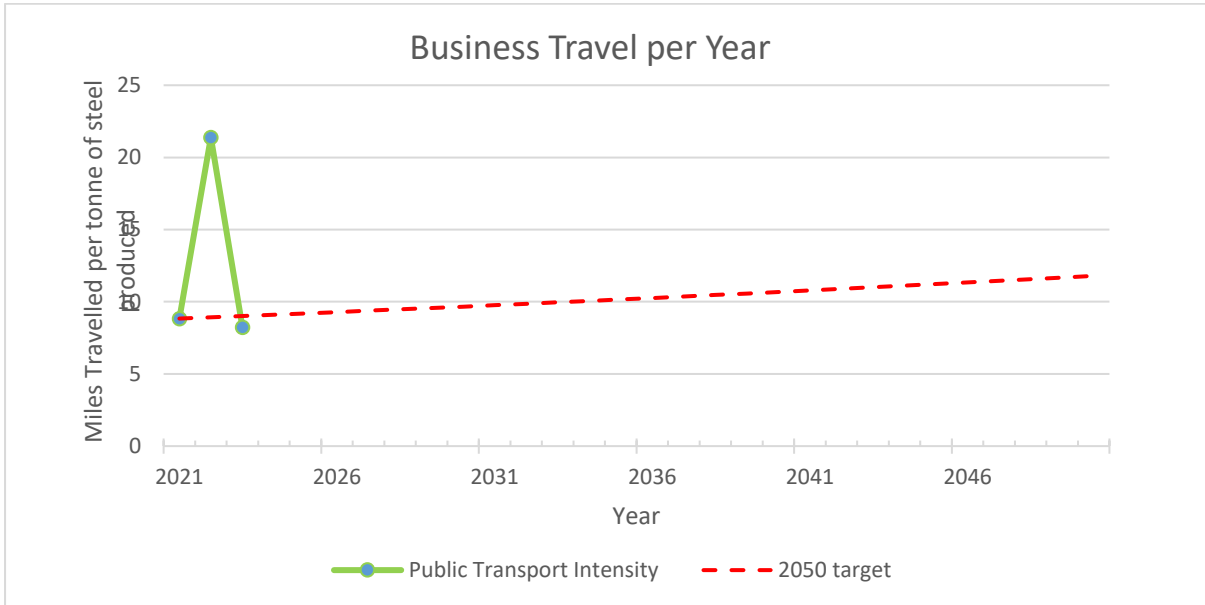| Report: |
| --- |
| Overall, there has been a decrease of 7% in the total public transport business travel mileage from a 2021 benchmark so target expectations of 1% increase per year are not being achieved (combined total for 2023 since benchmark is 2% increase). |

Target:
Increase the intensity of public transport travel mileage <u>per tonne of steel</u> by 1% each year using 2021 figures as a benchmark.

Year	Total Public Transport Travel (miles)	Public Transport Travel intensity (mile per tonne)	Performance
2021	48,900	8.8	
2022	79,300	21.4	~143% increase in intensity
2023	36,660	8.2	~62% reduction in intensity

Business Travel per Year

Report:
Overall, there has been ~7% reduction in public transport travel intensity per tonne of steel produced from a 2021 benchmark so target expectations of 1% increase per year are not being achieved (combined target for 2023 since benchmark is 2% increase).

10. BIODIVERSITY & SITE STEWARDSHIP

- Establish a policy, supported by a documented management system, for managing the risks and potential impacts of the organisation's activities on biodiversity and ecosystems.
- Develop and implement a biodiversity action plan to protect and enhance the natural environment and biodiversity.
- Report to stakeholders on demonstrable actions taken in accordance with action plan.

Target:

Implement a new Bourne Group Biodiversity Policy.
Develop a biodiversity action plan to include:
    • Adding biodiversity impacts and aspects within the Environmental Manual.
    • Adding biodiversity within site specific environmental plans.
Develop a training plan for all Bourne Group staff to undertake biodiversity training, utilising resources on the Supply Chain Sustainability School.
Revise the health, safety, and environmental audit template to include biodiversity checks.

Report:

Bourne Group have introduced a Biodiversity Policy, embedded within BGL PM 8.50 Environmental Manual. The policy ensures continual improvement by:
 	
    • Managing and minimising the negative impact on biodiversity through legal compliance.
    • Assessing biodiversity risks and opportunities through specific risk assessments (BGL 825 Environmental and Sustainability Plan).
    • Developing plans for monitoring flora and fauna.
    • Considering opportunities where biodiversity can be developed and enriched.
    • Providing all staff and sub-contractors training and education in biodiversity matters.
 	
Biodiversity training will be issued to all Bourne Group staff as part of the sustainability training programme for 2023/24, via the Sustainability Supply Chain School platform.
 	
The health, safety, and environmental audit template was reviewed but no changes were made as there is already reference made to the environmental and sustainability project plan.

11. HUMAN RIGHTS, MODERN SLAVERY & BUSINESS ETHICS

- Establish a Human Rights and Modern Slavery Policy, supported by a documented management system appropriate to the business, to respect human rights and protect workers. The policy will be in accordance with Guiding Principle 16 of the UN Guiding Principles on Business and Human Rights.
- Implement a documented risk assessment and due diligence process to identify and act upon actual and potential human rights risks for workers and other stakeholders.
- Publish an annual Modern Slavery and Human Trafficking statement setting out the steps taken to prevent modern slavery in the business and the supply chain – this should also demonstrate a commitment to continual improvement.
- Establish a documented code of business ethics or conduct.
- Implement and regularly review a documented risk assessment of internal operations focussed on the avoidance of bribery and corruption.
- Establish a policy and mechanism for the confidential reporting, investigation, and resolution of suspected cases of bribery and/or corruption, that shall be communicated widely and protect the whistle-blower from harassment or victimisation.

Target:
Review and update the Bourne Group Slavery and Human Trafficking Policy Statement. Implement a Human Rights and Modern Slavery Policy. Develop a Human Rights and Modern Slavery documented management system that includes an updated and revised Cascade manual/user guide. Develop and implement a Modern Slavery risk assessment to include employees, agency workers and sub-contractors. Develop an online Modern Slavery training package to be uploaded on the Air IT Service Hub training platform. Review and update the Modern Slavery and Human Trafficking annual statement. Review Bourne Group Company Handbook to include all the revised documents (as above).

Report:
Bourne Group Policies governed by Human Resources have been reviewed and updated. A Modern Slavery risk assessment has been completed for Tier 1 suppliers. The principles of Modern Slavery have been incorporated within the Bourne Ready induction. An Anti-Slavery and Human Trafficking online course has been added and uploaded to the Air IT Service Hub training platform and forms part of the mandatory training for all staff to complete. The Company Handbook has been reviewed and updated.

12. EMPLOYMENT AND SKILLS

- Establish an Employment and Skills Policy, supported by a documented management system, for the learning and development of its employees and carry out regular reviews of its performance. Responsible Sourcing awareness/training should be evidenced in all relevant professional and functional training with an induction programme that refers explicitly to aspects related to health and safety, human rights, sustainability, corporate responsibility, and business ethics.
- Report to stakeholders on the performance relating to the learning and development of its employees.
- Obtain external verification of the learning and development information and data.
- Establish a policy, supported by a documented management system, for enhancing the diversity and inclusiveness of its workforce, and carry out regular reviews of its performance.

Target:

Review and update Bourne Group Employment and Skills Policy, to include reference to Air IT Service Hub and Bourne Ready.
Update Cascade to ensure all employee sustainability and environmental training records are captured, including setting up an additional training course code for this to be recorded under.
Review and update the Bourne Ready induction to include sections on:
    • Corporate responsibility.
    • Business ethics.
    • Sustainability (SteelZero, Supply Chain Sustainability School, Science-Based Targets initiative etc.).
Produce an annual diversity and inclusiveness report to include statistics on workforce age, ethnicity, gender, and nationality.
Review and update Bourne Group maternity policy.
Increase Bourne Group Mental Health First Aid network to include site-based personnel.

Report:
An Employment and Skills Policy has been implemented. The Bourne Ready induction has been updated to include corporate responsibility, business ethics and sustainability matters. An annual diversity and inclusiveness report has been produced. The Bourne Group maternity policy has been reviewed and updated. Additional site personnel have been identified to complete the 2-day Mental Health First Aid course (ongoing).

13. LOCAL COMMUNITIES

- Establish a Local Communities Policy, supported by a documented management system, to identify and consult with local community stakeholders directly affected by the activities and operations of the business.
- Establish written procedures to record all complaints from local community stakeholders and any subsequent and associated actions including prosecutions.
- Undertake regular reviews of its performance in terms of local community relationships, liaison activities and complaints incidents.
- Report annually to stakeholders on local community engagement, liaison activities and complaint incidents.
- Obtain external verification of the local community engagement, liaison activities and complaints incidents.
- Establish a policy, supported by a documented management system, to promote local sourcing of products and services, and the use of local staff and expertise where appropriate and practical.

Target:
Review and update BGL 300 Launch Meeting Agenda to include Environmental Social Governance (ESG) matters. Implement a Local Communities Policy and documented management system for all site/project works, to include: Community: - Create a template detailing pre-start/project information that can be issued to local residents and businesses.   - Create an introductory letter that can be used to outline the site/project works.   - Create a resident's newsletter/literature/code of conduct that can be regularly issued.   - Create a resident's website/online area where communication of site activities can be shared.   - Establish KPIs for a range of community support initiatives.   - Create a register to log/record all goodwill gestures.   - Establish KPIs for contacting local schools, colleges, and nurseries to discuss joint initiatives.   - Create a register to log/record all compliments and complaints that details any action taken.   - Create a schedule of noise monitoring (for day and night works) to control and limit noise where possible.   - Create a method of collecting comments and suggestions external to the site/project hoarding.   - Review and update the Bourne Group Traffic Management Plan template to ensure it covers the prevention of traffic build up.   - Create a role and responsibilities for a local communities' champion (e.g. to keep up to date on community initiatives including fun-days, apprentice schemes etc.   - Establish KPIs for 'meet the contractor' events/drop-in sessions.   - Create a satisfaction survey template and establish KPIs of how this will be monitored and recorded.   - Establish targets for the employment of local apprenticeships.   - Establish targets for the employment of ethnic minorities.   - Create a template detailing how local businesses will be promoted on site.   Environment: - Create a Site Waste Management Plan template.   - Create a template for recording site carbon emissions (wherever possible).   - Establish KPIs for the use of local materials, wherever possible.   - Create a template for reporting site environmental performance.   - Create a template for noise monitoring.

Workforce:
- Introduce a site/project employee of the month scheme.
- Initiate health and wellbeing initiatives (smoking, prostate cancer, healthy eating etc.).
- Create a suite of toolbox talks based on health/mental health matters.
- Introduce free 'fruit Friday's' or a similar scheme.

Report:

BGL 300 Launch Meeting Agenda has been updated to include a full section on 'Environmental, Social & Governance (ESG)' – this will be used in all future project launch meetings.

Bourne Group have introduced a Local Communities Policy, embedded within BGL PM 8.50 Environmental Manual. The policy commits to supporting:

- Community engagement.
- Local businesses.
- Employment, skills, and education.
- Fairness, inclusion, respect, and wellbeing.
- The environment.

BGL 855 Local Communities Plan has been implemented that will be used for site-based works. The plan describes how Bourne Group will deliver community engagement activities when undertaking operational activities on site and defines the scope of these requirements, it also allocates personnel responsibilities for these prescribed issues. This will be used for all future site works.