

Environmental and Sustainability Policy

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1. What this policy is about and why we need it

This policy formalises Acis' approach towards the provision, maintenance and management of good quality affordable housing in a manner that will promote sustainability and reduce the group's environmental impact and emissions.

This policy sets out the key principles in our approach to

- Sustainability in building and the environment
- Sustainable communities
- Sustainability in the workplace
- Supporting our customers

We need this policy to ensure that we:

- manage our operations and promote a culture that helps deliver actions that are environmentally sustainable, economically feasible and socially responsible to help to sustain the communities of today and the future.
- Meet the requirements of the statutory targets and standards set out by the government and other agencies, by means of balancing the environmental, social, and financial needs of our customers and our business to successfully deliver our services in a responsible and ethical way.
- Reduce carbon emissions and utility usage through prudent and responsible use, and by promoting resource efficiency associated with day-to-day activities and new developments creating a sustainable, safe, and cost-effective future for the organisation that impacts positively on our customers and stakeholders.
- Reduce the environmental impact on our communities, wildlife, and the environment; creating a sustainable and cleaner future for everyone, with opportunities to develop community-based sustainable strategies aimed at the protection, conservation, restoration and sustainable use of resources.

We will ensure that practicable targets are established, maintained, and promoted throughout the group to continuously improvement across the operation of its services by:

- Ensuring that suitable and sufficient governance arrangements are in place to manage all environmental related impacts, subjects, and matters.
- Ensuring that an effective organisational structure is established which defines clear roles and responsibilities for the management of environmental and sustainability issues and continued development towards decarbonisation targets.
- Providing adequate resources to ensure the effective management of sustainable and environmental issues.
- Promoting awareness to our people, our customers and relevant stakeholders, providing opportunities for people to reduce their personal environmental impact, get involved in our group-wide initiatives, and share best practice. This includes

the awareness of the financial and organisational risks posed by failure to meet government targets.

- Proactively developing and maintaining working partnerships with all relevant stakeholders and appropriate bodies to facilitate the provision of Net Zero targets as set out in the government strategies.
- Regularly reviewing and monitoring compliance with the requirements against legislation, government targets and organisational needs.

2. Who does this policy apply to?

This policy applies to Acis Group Limited (Acis) and all its subsidiary companies.

The policy applies to employees, stakeholders and contractors who have identified responsibilities both within this document and in line with supplementary procedures/ information and guidance.

3. Our policy

3.1 Objectives

The objectives of this policy are to:

- Comply and align with all legislative, regulatory, and contractual obligations in respect of environmental emissions, energy use, waste and water management.
- Provide sustainable, warm, healthy, and cost-effective properties for our tenants.
- Proactively deliver new and sustainable developments that meet strategic and regulatory targets in an effective and balanced manner. For all new build and major repair and improvement works this will include a requirement to design properties which optimise the use of finite natural resources, energy consumption and reduce the production of waste, emissions and environmental impacts.
- Meet the Government's current Fuel Poverty Strategy target and where possible aim to have all our properties at EPC rating C, or above, before 2030
- Proactively support the ongoing review and implementation of technological changes that would deliver better and more cost-effective methods of meeting our targets.
- Ensure the fabric of our buildings are continuously reviewed to make sure that adequate provisions are in place to maintain and improve the thermal qualities allowing the continual improvement of Standard Assessment Procedure (SAP) ratings within our portfolio.
- Provide a proactive approach towards the ongoing implementation of renewable technologies within our buildings and across the group.
- Embed a positive culture for good environmental practices throughout the group with a sustainable future in mind.

- Ensure our education provision within the group helps meet local sector skills gaps and promotes a sustainable community ethos.

3.2 Scope

3.2.1 SUSTAINABILITY IN BUILDINGS AND THE ENVIRONMENT

To promote the sustainability focus of our asset management, development and maintenance activities, we will:

- Ensure that our activities reduce waste, reduce energy consumption and minimise CO2 emissions. We will do this by integrating and embedding sustainability measures including decisions on location, mix and function of all new projects; design and specification; the most effective forms of procurement; construction methods; material specification; energy sources; the future use and maintenance of the buildings; waste management; and site management. These measures will be introduced in the next revision of Acis' Design Standards by 2026/27.
- Review the sustainability practices of our contractors and where appropriate include sustainability targets within contract conditions. We will achieve this by working with framework partners to introduce revised contracts from 2026/27.
- Continue to conduct a full EPC when a property becomes vacant, and prior to re-letting, utilising MRI Asset and SAVA Intelligent Energy software to review the data to identify any practicable energy efficient measures.
- Continue to deliver a Stock Condition Survey programme alongside other internal property interventions to identify properties that would benefit from upgrades, targeting properties that have a SAP rating that sits outside of the government targets for 2030.
- Prioritise the use of low lifecycle products, seeking to use components in our new build developments, and in our planned replacement programme, that have long lifespans and deliver energy efficient solutions during their lifetime. We will achieve this by working with framework partners to introduce revised contracts from 2026/27.
- Continue to embrace recycling activities to maximise waste reduction. We will also ensure that goods are re-used as far as possible by supporting and participating in schemes that promote this.
- Make the best use of green space to increase biodiversity across our area of operation. We will engage with tenants in the use of their open spaces and where quality of open spaces is poor, we will work with tenants to undertake improvements. We will deliver this through regeneration programmes starting now and through community days throughout the lifespan of this policy.
- Work to reduce water consumption by using components in our new build developments, and in our planned replacement programme, that limit water usage with immediate effect.

3.2.2 SUSTAINABLE COMMUNITIES

We will contribute to the establishment and enhancement of sustainable communities through the following measures:

- Providing and developing safe, warm and comfortable homes that people want to live in, both now and in the future by ensuring our annual investment programme maintains decent homes standards and investing in placemaking activity in partnership with internal and external stakeholders. This is already a commitment in the Asset Management Strategy.
- Promoting and participating in the development of community facilities and fostering a sense of 'place' and focus within our neighbourhoods to promote social inclusion. This is already a commitment in the Asset Management Strategy.
- Continuing to promote and create opportunities for the development of skills and enhancement of knowledge within communities and promote local employment initiatives. We will also focus on current and future skills needs, to create a curriculum offer within our learning centres to deliver online and site-based opportunities as part of their ongoing programmes that enables people to have more awareness of sustainability challenges.
- Ensuring our people are encouraged to identify environmental concerns, and for cases of fuel poverty, enabling the appropriate measures to be implemented to support our customers and the wider communities in which we work utilising software such as the My Concern app and monitoring responses via the One View system.
- Identify climate mitigation and adaptation opportunities such as reducing flood, fire and overheating risks, reducing air and water pollution for our new developments and existing communities. These measures will be introduced in the next revision of Acis' Design Standards by 2026/27.

3.2.3 WORKPLACE SUSTAINABILITY

To promote the sustainability focus of our activities within the workplace, we will:

- Continue to reduce the carbon footprint of our operations, ensuring that our activities address waste, energy consumption and CO2 emission issues. We are already actively encouraging recycling through the provision of recycling bins as we seek to recycle all our office waste, print cartridges, toners, and computers.
- Drive efficiency and value for money through effective and compliant procurement processes, excellent contract management and the consideration of quality and whole life costs of all goods and services purchased. We will achieve this by working with framework partners to introduce revised contracts from 2026/27.
- Ensure that all our people receive training through our learning centres on environmental and sustainability issues and opportunities for improvements, share relevant information supporting this policy to enable a better understanding of our goals and objectives, and encourage involvement and ownership to drive our

positive environmental impact. Our Training Plan will be utilised to measure the successful implementation of these initiatives from 2026/27.

- Develop measures to monitor and manage our fleet and grey fleet to ensure that we promote sustainable fuel options, reduce business travel and promote our people's understanding of the environmental impact of travel choices. We will introduce electric vehicle options into the fleet during the lifetime of this policy and collect driver feedback and fuel cost data to inform fleet choices at the end of the next contract.

3.3 Supporting our customers

To promote knowledge and understanding across our customer base on sustainability issues within the home, we will:

- Increase awareness of environmental issues through a guidance document and video library on the website, and the delivery of carbon literacy training and energy advice online and via our learning centres.
- Provide information and support on new or renewable technologies through user manuals and customer guides, monitoring calls to our Customer Service Centre to measure success.
- Continue to develop sustainable and renewable energy options for fossil fuelled properties, working with partners to maximise fully externally funded options wherever possible, to deliver the current government EPC C by 2030 target. We will then fully support customers participating in our Retrofit Programme, by providing information, advice and guidance before works commence, managing contractor performance on site and conducting post-works satisfaction surveys across at least 5% of all contracts.
- Identify opportunities to reduce damp and mould through a guidance document and video library on the website, and the delivery of training and advice online and via our learning centres. We will also continue to deliver improved ventilation strategies and utilise smart technologies for higher risk customers and properties and work with customers to share data and best practice.
- Further develop and support environmental and community projects which help customers reduce their environmental impact. These will be monitored and evaluated using both environmental and social value metrics.
- Develop and grow our energy advice services and support to our customers experiencing energy debt and fuel poverty. We will continue to explore partnerships that help to reduce fuel poverty and energy and water consumption, such as securing low-cost energy contracts, providing energy and water saving devices, promoting supplier switching services and green doctor programmes. We will utilise new technologies to monitor fuel costs and work with customers to share data and best practice
- Work closely with our older and vulnerable customers and specialist housing schemes to ensure they have warm, healthy and affordable homes by providing proactive advice and guidance and using interactive smart technology to monitor usage and cost. This is already a commitment in the Asset Management Strategy.

- Provide electric vehicle charging points on all new developments and explore communal charging options at blocks and schemes as part of a wider review of sheltered accommodation to develop an action plan from 2026/27
- Develop a Digital Property approach to maximise the opportunity of smart home technologies that help to reduce energy consumption and support or encourage sustainable behaviours. These measures will be introduced in the next revision of Acis' Design Standards by 2026/27
- Promote community-based re-use and recycling projects and partnerships (e.g. furniture recycling and repair cafes) to raise awareness, reduce waste to landfill and fly tipping, and drive behaviour change, working with external partners throughout the lifespan of this policy.

3.4 Responsibilities

The table below identifies key responsibilities.

Position	Role/ Responsibility
Board	• Oversight of sustainability issues and requirements
Chief Executive	• Policy owner
Executive Leadership Team	• Implement this policy. • Make available adequate resources to enable delivery of this policy. • Ensure appropriate training is in place for our people and contractors. • Where appropriate, ensure members of their directorate undertake any identified roles and responsibilities.
Senior Management Team	• Support the implementation and delivery of this policy • Ensure the achievement of overall objectives and environmental targets
Building Safety & Sustainability Manager	• Review legislative changes and government targets relating to environment management within our properties • Assist the organisation in achieving its targets
Managers and Supervisors	• Implement, monitor, manage and report on our environmental impacts. • Report performance to the appropriate committee/board.
All people	• Ensure all operational targets are met • Ensure required works are completed correctly • Undertake and complete any corrective actions within the defined timescales

4. How we will monitor this policy

A suite of performance measures will be established to support environmental improvement. Operational performance on targets will be monitored quarterly by the Asset Investment team and will be reported to the Operations Committee as required.

Regular reporting, including the annual ESG review, the Sustainable Reporting Standard for Social Housing, the Streamlined Energy & Carbon Reporting framework (SECR), the Energy Savings Opportunity Scheme (ESOS), and all other statutory and best practice options, will update progress on Acis' environmental and sustainability journey and will be reviewed and agreed by the group's Board.

5. Links to other policies, legislation and/or regulations

In developing this policy, information, guidance, and references have been taken from the following:

- The UK Environmental Act 2021
- Equality Act 2010
- Decent Homes Standard 2006
- Housing Act 2004
- Homes (Fitness for Human Habitation) Act 2018
- Pre-Action Protocol for Housing Conditions Claims (England), 2021
- Landlord and Tenant Act 1985 (Section 11)
- Defective Premises Act 1972
- The Regulator's Consumers Standards (e.g. Home Standard)
- Health & Safety at Work Act 1974 (HSWA)
- Energy Act 2016
- Environment Act 2021
- Energy Conservation England & Wales regulations 2019
- Building & Buildings England & Wales regulations 2012
- Part L of the building regulations 2022
- The eco-design for Energy-Related Products & Energy Regulations 2021
- The Sustainable Communities Regulation 2012
- The Waste (England and Wales) Regulations 2011
- The Energy Efficiency (Private Rented Property) (England & Wales) Regulations 2015
- The Energy Performance of Buildings (England & Wales) Regulation 2012
- Net Zero Strategy 2021
- Heat & Buildings Strategy 2021
- Asset Management Strategy
- Repairs Policy
- Health & Safety Policy
- Equality & Diversity Policy
- Lettable Standard
- Void Policy
- Capital Works process map.
- Capital works procedure.
- The Sustainability Reporting Standard for Social Housing
- The Streamlined Energy & Carbon Report
- The Energy Savings Opportunity Scheme.

6. When this policy will be reviewed

This policy will be reviewed every 3 years or in the event of a change in regulations or legislation.

7. Jargon buster

Reference	Definition
Decent Homes	The Decent Homes Standard is a technical standard for public housing introduced by the United Kingdom government. The criteria for the standard are as follows: • it must meet the current statutory minimum standard for housing • it must be in a reasonable state of repair • it must have reasonably modern facilities and services • it must provide a reasonable degree of thermal comfort. The standard was updated in 2006 to take account of the Housing Act 2004, including the implementation of the Housing Health and Safety Rating System (HHSRS).
EPC	An Energy Performance Certificate which assesses the energy efficiency rating of a property based on its carbon dioxide emissions.
ESG Report	An ESG report measures and publicly shares a company's environmental, social, and governance performance.
SECR	The Streamlined Energy & Carbon Reporting framework is a statutory declaration of carbon and energy use for businesses in the UK that meet the qualifying criteria
ESOS	The Energy Savings Opportunity Scheme is a mandatory energy assessment scheme for businesses in the UK that meet the qualifying criteria
Net Zero	Net zero means no longer adding to the total amount of greenhouse gases in the atmosphere. The UK Government has set a national target to achieve this by 2050
SAP	Standard Assessment Procedure (SAP) is the governments method for calculating the energy performance of dwellings
Grey fleet	Personal vehicles used by employees for business purposes where mileage is reimbursed by the company