



St. James's Place Environmental

St. James's Place Environmental Policy

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1. Purpose of this Document

There are 4 primary uses of the document:

- Set out policy
- Set out responsibilities
- Set out Definitions
- Document Working practices

1.1. Document Revision History

ISSUE NO.	DATE	SECTION NUMBER	MODIFICATION	AUTHOR(S)
5.1	08/05/06	-	Reformatted version	R.King
5.2	14/06/06		Changed the structure diagram to reflect the working groups correct name	R.King
5.3	19/12/06		Removal of "capital" from Company name	R.King

1.2. Associated Documents

TITLE	ISSUE NO.	ISSUE DATE
None		

2. Environmental Policy – Statement of Intent

St. James's Place recognises that it has a responsibility to the environment and we will take positive steps to address the environmental impacts of our business operations. These impacts are both direct and indirect and include our operational impacts and the impacts associated with our business activities, such as investment and lending. We will seek to minimise our adverse impacts through good management, aiming for continuous improvement in our environmental performance.

St. James's Place is committed to the prevention of environmental pollution, and we regard compliance with the relevant environmental laws, as a minimum standard. Furthermore, we will seek to implement good practice wherever practicable.

Recognising our responsibilities and commitment to the environment, St. James's Place undertakes to:

- Understand and address the direct and indirect environmental impacts of our operations.
- Continue to measure our most significant environmental impacts, set realistic targets for improvement, and monitor progress, using formal auditing procedures where appropriate.
- Support the integration of environmental considerations and objectives into our business decisions.
- Make efficient use of natural resources and adopt effective waste management procedures.
- Ensure that our employees have an awareness of environmental issues, and that those with particular environmental responsibilities are provided with appropriate training.
- Continue to ensure that environmental considerations are included in our risk assessment procedures for commercial clients.
- Encourage our suppliers to adopt sound environmental principles.
- Integrate environmental considerations into our procurement of goods and services.
- Regularly review this policy and make it available to all our stakeholders.
- Publish information about our environmental performance for the benefit of our stakeholders.

St. James's Place supports the principles of sustainable development. We will manage risks effectively and seek to realise the opportunities arising from proactive management of our environmental, economic, and social responsibilities, to create long-term shareholder value.

Signed: _____
(Managing Director)

Date _____

3. Background

St. James's Place, in common with the rest of the financial sector, has significant direct impacts on the environment resulting from operational activities. These include:

- energy consumption and management,
- procurement of goods and services (including paper and printed materials),
- property management,
- transport of employees and goods,
- waste management,
- water consumption and management.

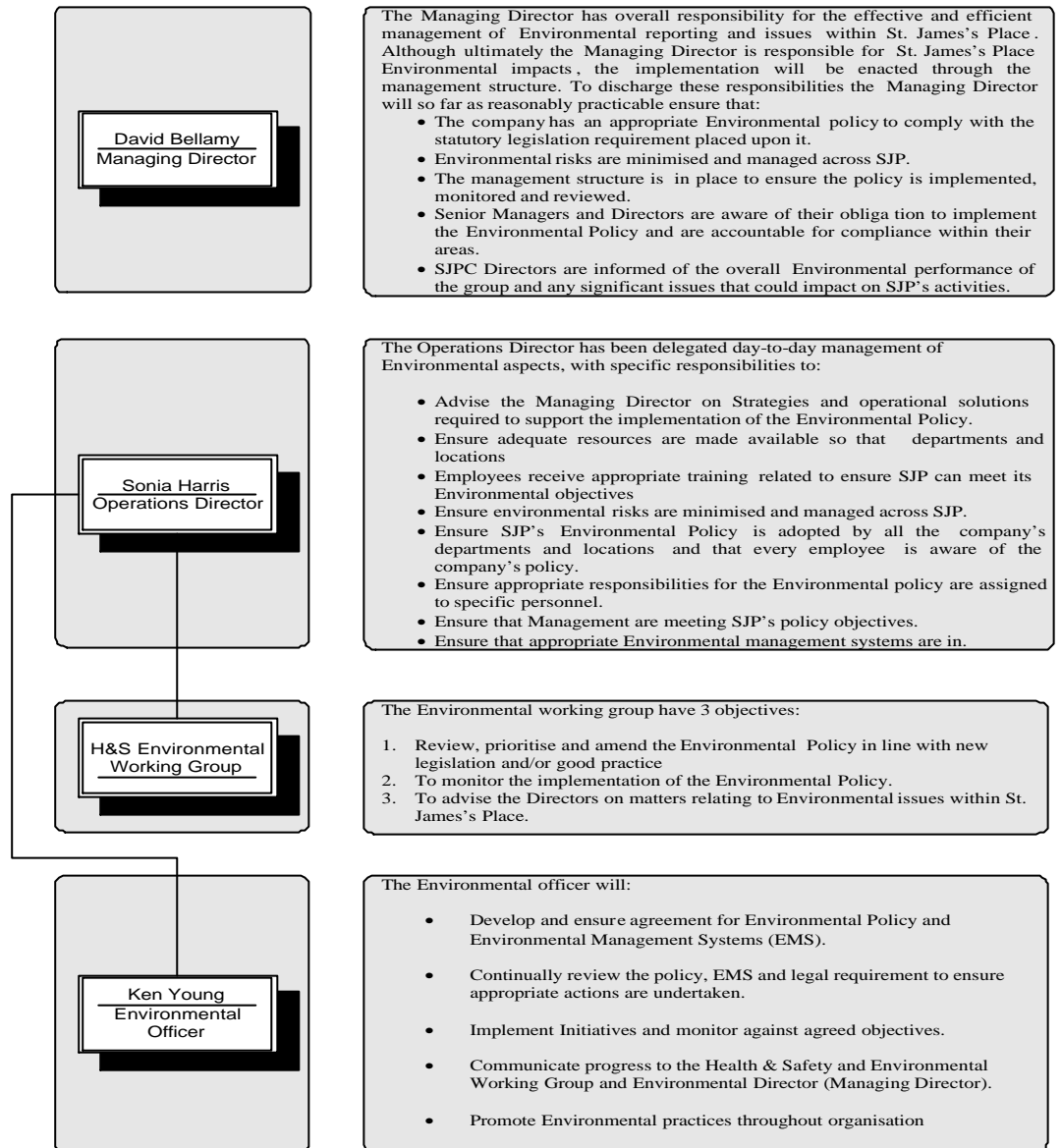
Whilst the environmental impacts of our operational activities are much less than that of other business sectors e.g. Manufacturing, Mining, Transport, Electricity, Water, Construction, they are none the less significant.

Indirect environmental impacts arise from core-business decisions and activities in areas such as lending, investment and insurance. In St. James's Place Group, significant environmental impacts may arise from decisions, activities, products and services in fund and asset management.

A member of the SJP Board has overall responsibility for environmental issues. Reports on environmental policy, strategy and progress are submitted annually to the SJP Board. The SJP Board Director responsible for environmental issues is the Managing Director of St. James's Place plc.

The Policy Statement is reviewed at least annually by the Health & Safety and Environmental Working Group to ensure alignment to appropriate legal and regulatory environmental requirements, and its continued relevance to the St. James's Place current and planned operations.

4. Health & Safety Environmental Reporting Structure



David Bellamy
Managing Director

The Managing Director has overall responsibility for the effective and efficient management of Environmental reporting and issues within St. James's Place. Although ultimately the Managing Director is responsible for St. James's Place Environmental impacts, the implementation will be enacted through the management structure. To discharge these responsibilities the Managing Director will so far as reasonably practicable ensure that:

- The company has an appropriate Environmental policy to comply with the statutory legislation requirement placed upon it.
- Environmental risks are minimised and managed across SJP.
- The management structure is in place to ensure the policy is implemented, monitored and reviewed.
- Senior Managers and Directors are aware of their obligation to implement the Environmental Policy and are accountable for compliance within their areas.
- SJP Directors are informed of the overall Environmental performance of the group and any significant issues that could impact on SJP's activities.

Sonia Harris
Operations Director

The Operations Director has been delegated day-to-day management of Environmental aspects, with specific responsibilities to:

- Advise the Managing Director on Strategies and operational solutions required to support the implementation of the Environmental Policy.
- Ensure adequate resources are made available so that departments and locations
- Employees receive appropriate training related to ensure SJP can meet its Environmental objectives
- Ensure environmental risks are minimised and managed across SJP.
- Ensure SJP's Environmental Policy is adopted by all the company's departments and locations and that every employee is aware of the company's policy.
- Ensure appropriate responsibilities for the Environmental policy are assigned to specific personnel.
- Ensure that Management are meeting SJP's policy objectives.
- Ensure that appropriate Environmental management systems are in.

H&S Environmental
Working Group

The Environmental working group have 3 objectives:

1. Review, prioritise and amend the Environmental Policy in line with new legislation and/or good practice
2. To monitor the implementation of the Environmental Policy.
3. To advise the Directors on matters relating to Environmental issues within St. James's Place.

Ken Young
Environmental
Officer

The Environmental officer will:

- Develop and ensure agreement for Environmental Policy and Environmental Management Systems (EMS).
- Continually review the policy, EMS and legal requirement to ensure appropriate actions are undertaken.
- Implement Initiatives and monitor against agreed objectives.
- Communicate progress to the Health & Safety and Environmental Working Group and Environmental Director (Managing Director).
- Promote Environmental practices throughout organisation

5. Scope

This Company Environmental Policy Statement:

- Sets out the high-level requirements of the Board of St. James's Place plc (the "SJP Board").
- Defines the environmental policy of the company.
- Is recommended by the SJP environmental team and approved by the SJP Board.
- Applies to all company operations within the United Kingdom.
- Supports the 'company operating philosophy, policies and standards' document which defines the highest level of policies and standards for the company.

Any environmental procedures or processes issued within the company are required to be consistent with the high-level principles and standards established by this policy statement.

5.1. Review and update of this statement

This policy statement is reviewed at least annually by the SJP H&S and environmental Working Group to ensure alignment to appropriate legal and regulatory environmental requirements, to ensure its continued relevance to the company's current and planned operations.

6. Corporate Objectives and Targets

6.1. Corporate Objectives

To ensure that St. James's Place meets the commitments set out in the Environmental Policy, the company has set out a number of long term objectives for the environmental programme, for the next five years, which are reviewed annually as part of the Management Review.

The Corporate Objectives are to:

- Maintain a comprehensive environmental management system (EMS) throughout the organisation.
- Review the direct environmental impacts of our business to identify and, where practicable, measure adverse impacts, setting appropriate environmental improvement targets and monitoring progress.
- Use energy and water efficiently and optimise our use of natural resources.
- Minimise the volume of waste deposited to landfill by re-using and recycling materials wherever possible, or by identifying the best practicable environmental options for disposal.

- Ensure that our colleagues are aware of relevant environmental issues, and of their own roles and responsibilities in delivering the overall programme, providing training for those with particular responsibilities.
- Encourage the development of products and services, e.g. through the development of new socially responsible investment products, that will help our clients to adopt sound environmental principles and practices.
- Ensure that our key suppliers and contractors are aware of our policy and that wherever possible; they operate to similar standards, as a minimum.
- Continue to provide support for sustainability initiatives that contribute towards the preservation or enhancement of the quality of life in the communities in which we operate.
- Review and monitor our environmental programme on an annual basis, including the relevance of our policy and objectives, and identify examples of best practice that may be shared throughout the Group.
- Collate and publish relevant information about our environmental performance on an annual basis, in print and web-based formats.

6.2. Targets

SJP acknowledges the commitment expected of businesses to reduce their carbon dioxide (CO₂) emissions in support of the UK Government's Climate Change Programme.

Following establishment of adequate baseline data, the company will seek to establish appropriate environmental targets for its most significant environmental impacts. The company's environmental performance will be measured and reported by the environmental team to the Board at least annually in preparation for the publication of the company's Environmental Report.

6.3. Monitoring and Measurement

The environmental team will support the management structure at SJP in monitoring and measuring the key environmental impacts of their respective business units, and will produce a company wide database, from which an annual report to the SJP Board will be produced. Performance data will be published in the annual Environmental Report.

Wherever it is practicable to do so, we monitor our progress using Key Performance Indicators (KPI's) that relate to some of the company's environmental aspects. These are also reviewed and reported annually and allow us to make comparisons between different parts of the group and analyse year-on-year trends.