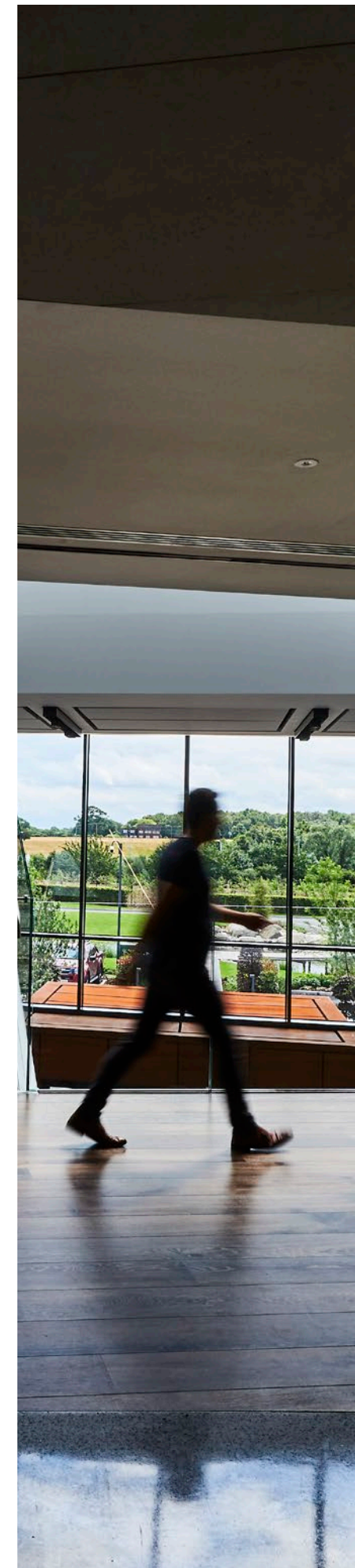




Sustainability Report 2023 · **Creating a Sustainable Future**



PEOPLE PLACE PLANET

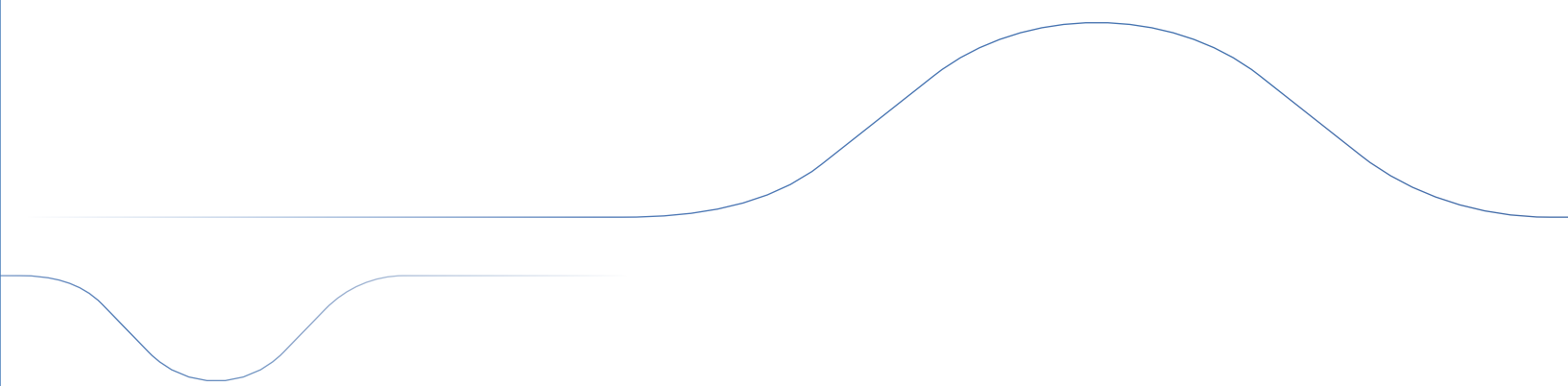


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Welcome to IM Properties' (IMP) second annual sustainability report: an opportunity for our stakeholders to explore the steps we've taken in 2023 to further integrate sustainability across our business and operations. It's an honest and open representation of where we have progressed, where we have room to grow and how we will continue delivering our Sustainable Futures strategy and commitments.

Unless otherwise stated, data included is from the 2023 calendar year and for UK operations only.

We maintain an A-Z of terminology and definitions we use to clarify key Sustainable Futures communications.



At IMP, we are dedicated to embedding sustainability considerations further into our developments. To do so, we must continually evolve our approach, innovating and iterating to deliver a portfolio of future-proofed assets that help customers and occupiers advance their sustainability behaviours. At the same time, we must look at the steps we can take internally to drive responsible business practices, supported by our suppliers and valued partners.

I am honoured to share this 2023 sustainability report, a transparent account of the steps IMP has taken to progress against our Sustainable Futures strategy and commitments.

Throughout 2023, IMP, and the wider property development industry, battled against a fluctuating backdrop of market volatility, global events and rising interest rates. At the same time, the sustainability landscape presented complexities, with a lack of a consistent, industry-wide approach to net zero compounding the challenge of decarbonising the built environment. Nonetheless, we have remained dedicated to our strategy, and to transparently reporting on our progress.

Having set our sights on improving the emissions footprint of our business and developments, throughout 2023 we undertook a full assessment, supported by SLR Consultancy, to determine baseline performance. We also worked with SLR to validate our emission targets in line with Science Based Targets initiative (SBTi) recommendations.



Even as we've established this foundational understanding of our impact and how we will address it, we have continued delivering projects with a reduced emissions footprint. Our Edge development in Enfield sets a new standard for sustainable logistics sites – it is Net Zero Ready, with an EPC A+ rating and a rooftop solar array.

Wherever we develop and operate, we want to use IMP's presence for good, creating local jobs, offering skills development opportunities and funding community-focused organisations. In 2023, we celebrated one year since the launch of the IMP Community Fund – a dedicated grant-giving programme that distributes funds to worthy community initiatives. Throughout 2023, we proudly distributed over £80,000 in grants, helping 35 organisations deliver programmes that benefited over 41,300 people. We were also proud to enter the final stage of our Hinckley Park development, a project that exemplifies our commitment to community support. Throughout its lifetime, our local spend on Hinckley has totalled nearly £2,233,000. We also launched a £100,000 Hinckley Park Community Fund to provide grants to local organisations benefitting 1,243 local people.

Our people are as passionate about creating social value as we are; to support this, we continue exploring new ways for employees to give back. Just one example, 2023 heralded the launch of

our Volunteering Week, a multi-day event to engage employees in actions for the community. It was truly inspiring to see our people get involved in various activities and a real testament to their dedication to helping deliver on our ambitions. In fact, during 2023, together with our supply chain partners, our employees volunteered nearly 830 hours to local causes.

Achieving our goals and delivering on our strategy wouldn't be possible without the support of like-minded partners who share our commitment to advancing a more sustainable future. I would like to take this moment to extend my heartfelt gratitude to everyone who contributes to our success – our employees, our customers, our suppliers and our community partners.

The real estate sector is constantly changing, as stakeholder expectations shift, regulations develop and customer needs evolve. With a strong portfolio designed with the present and future in mind – and a strategy that helps embed sustainability further into our decisions and developments – I am certain IMP will keep pace and remain ahead of the industry curve.

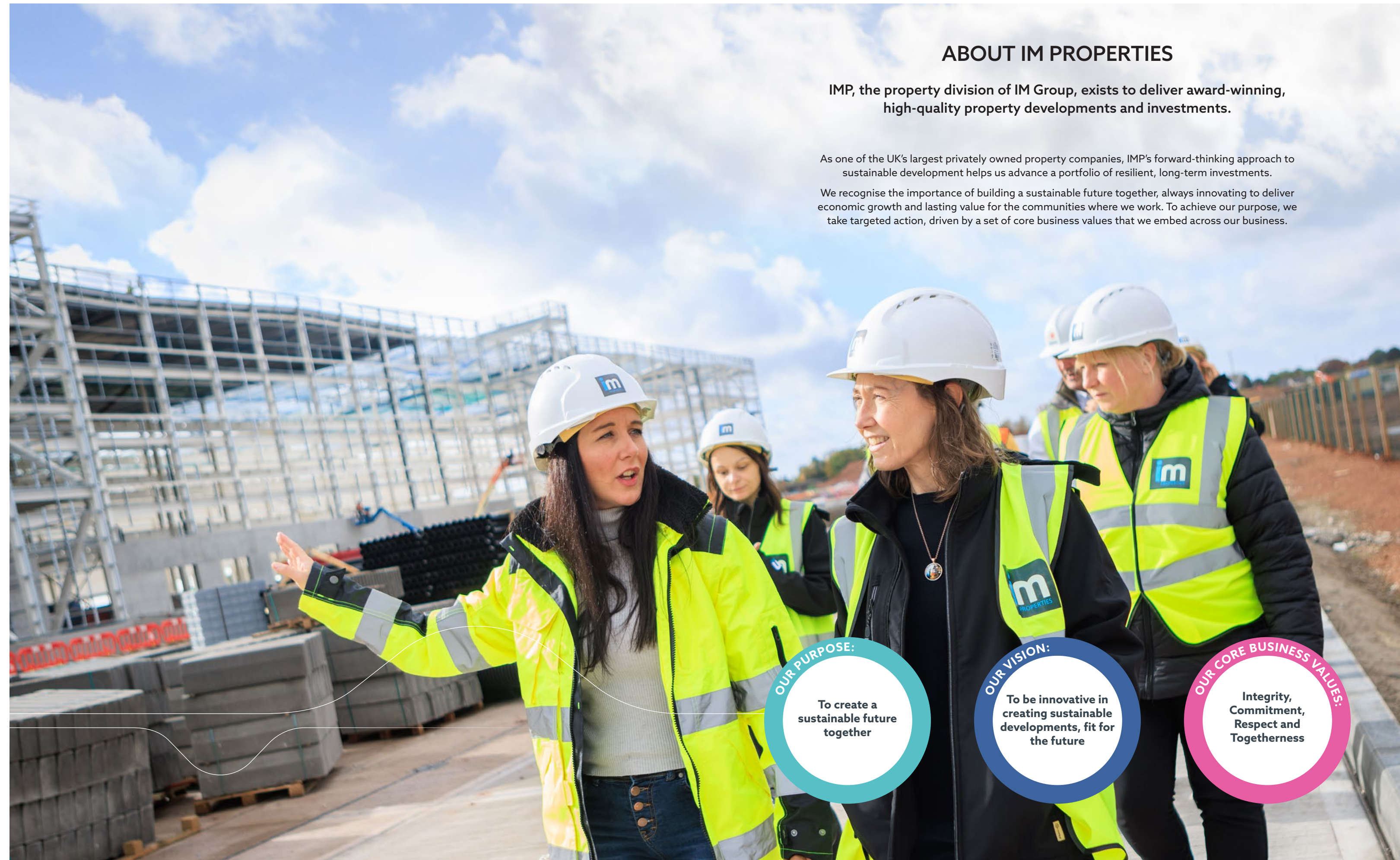
Tim Wooldridge
Managing Director

ABOUT IM PROPERTIES

IMP, the property division of IM Group, exists to deliver award-winning, high-quality property developments and investments.

As one of the UK's largest privately owned property companies, IMP's forward-thinking approach to sustainable development helps us advance a portfolio of resilient, long-term investments.

We recognise the importance of building a sustainable future together, always innovating to deliver economic growth and lasting value for the communities where we work. To achieve our purpose, we take targeted action, driven by a set of core business values that we embed across our business.



OUR PURPOSE:
To create a sustainable future together

OUR VISION:
To be innovative in creating sustainable developments, fit for the future

OUR CORE BUSINESS VALUES:
Integrity, Commitment, Respect and Togetherness

IMP BY THE NUMBERS

- 90 assets totalling 3.5m sq ft
- £1bn of assets under management
- £60m of green loan facilities across the portfolio
- Over 15m sq ft delivered
- 231 occupiers managed across the portfolio
- 1,250 Spitfire Homes delivered to date



OUR BUSINESS:

We understand our work makes an essential contribution to local economic and societal growth. We take that responsibility seriously and work to stay ahead of the industry curve, pursuing continuous learning and innovation to deliver quality, more sustainable developments against a challenging and evolving industry backdrop. To best guide our approach to creating wide-reaching value, IMP is divided into four divisions.

Development

Our UK developments include large-scale commercial employment parks. We take a long-term view to development, leveraging current best practice by exploring new products and innovative approaches to understand how we can create greater stakeholder value. We also maintain open channels of communication and collaboration to better understand the communities that live and work around our developments.

We are committed to delivering social value beyond the boundaries of our sites. That is why, wherever we develop, we seek to work responsibly and with integrity, creating high-quality properties and places that meet occupier needs and benefit local communities.

Investment

The IMP Investment Team manages our UK property portfolio. Whenever we invest in projects, we consider sustainability and social impact throughout our decision-making - from initial acquisition through to the operation and maintenance of assets. The IMP Investment Team fosters and grows collaborative relationships with managing agents and occupiers, to help assets continue to reach their full potential.

IM Land

IM Land, the strategic land arm of IM Properties is focused on designing and delivering great places for people to live. The team oversees the acquisition and design of residential development sites, often working with major PLC housebuilders, financial and professional services, and local government. They help plan delivery by bringing together local planning authorities, housebuilders, occupiers and developers.



Spitfire Homes

Spitfire Homes is our homebuilding division, specialising in the construction of sustainable, high-quality homes across the Midlands. Driven by design and customer service excellence, Spitfire delivers modern, practical homes. Spitfire has delivered over 1,250 homes since 2011, and in 2023 was named Small Housebuilder of the Year at the annual Housebuilder Awards.



OUR APPROACH TO SUSTAINABILITY

We're working to deliver a lasting positive legacy wherever we have a presence. That not only means developing places where people love to live, work and play but also taking targeted action to benefit our communities and improve the sustainable characteristics of our business and portfolio.



A STRATEGY FOR SUSTAINABLE DEVELOPMENT

At IMP, we strive to embed sustainability into our decision-making processes, from how we operate every day to the long-term assets we choose to invest in. To support this, we maintain a targeted Sustainable Futures strategy that helps drive progress against our most material issues. The strategy sets out our vision for 2030, centred around three pillars: People, Place and Planet. Each pillar has a long-term ambition, underpinned by key objectives.

We understand that realising a sustainable future requires collective action. That's why surrounding our three pillars is an all-encompassing commitment to Partnerships and Practices. And, to ensure our efforts contribute to the wider global sustainability agenda, we have aligned Sustainable Futures with the UN Sustainable Development Goals (SDGs) we believe we have the greatest opportunity to impact.

We continuously monitor and assess our objectives to ensure ongoing relevance against the evolving sustainability landscape.



Supporting UN Sustainable Development Goals:

3 GOOD HEALTH AND WELL-BEING



4 QUALITY EDUCATION



8 DECENT WORK AND ECONOMIC GROWTH



11 SUSTAINABLE CITIES AND COMMUNITIES



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



14 LIFE BELOW WATER















15 LIFE ON LAND



OUR COMMITMENTS

We know what we want to achieve: a sustainable future. To help us get there, we have established a series of robust commitments to support year-on-year progress against our strategy.

- Key**
- Complete 
 - Making progress 
 - Off track 

Sector	Our commitments ¹	Our progress	2023 status
People	We will formalise an internal wellbeing and inclusion strategy by 2023.	We have established a company-wide Wellbeing Events Delivery Group (chaired by IMP) to plan and deliver an enhanced and cohesive employee wellbeing strategy. The group agreed a calendar of events for delivery, starting in 2024 as well as a new, dedicated wellbeing budget to ensure delivery.	
	We will commit to a programme of research with our customers, occupiers and homeowners to understand the best ways to engage them on sustainability, starting in 2022.	We will continue to understand the needs of our customers through a programme of internal and external feedback surveys. Our Investment division has surveyed DHL, FedEx and Gregory in 2023. Spitfire continue to use a programme of customer surveys throughout the customer journey supported by a third party survey following legal completion to align efforts with industry best practices.	
	We will host an annual Sustainability Day to inspire and encourage customers, occupiers, suppliers and colleagues on sustainability from 2022.	Building on our previous format for our annual Sustainability Day, during 2023, we launched our Volunteering Week to engage staff in volunteering opportunities near our projects and headquarters.	
	We will carry out post-occupancy surveys with all new customers by 2023. Spitfire Homes continued to engage homeowners post-completion.	In 2023, we launched a new process for Spitfire using the external Home Builders Federation customer satisfaction reporting, which gives us a Recommend a Friend score based on surveys issued eight weeks after completion. Spitfire's score for the 2022/2023 survey year (which runs from 1 October 2022–30 September 2023) was 82.1%, giving them a 4-star housebuilder rating.	
	We will produce and distribute an annual sustainability performance report, starting in July 2023.	This is our second annual sustainability report, which we share as part of our commitment to regular and transparent communication with stakeholders.	
Place	We will establish an IMP Community Fund by 2022.	The IMP Community Fund was launched in December 2022 and distributed over £80,000 in grants during 2023 – helping 35 organisations deliver programmes benefiting over 41,300 people.	
	We will empower our colleagues to support communities, committing two days of paid volunteering per colleague annually.	365 hours of volunteering were delivered by IMP and Spitfire staff during 2023.	
	We will engage with a strategic partner to embed social enterprises into our procurement process.	We continue to procure office suppliers through the social enterprise WildHearts Office. Working with Supply Change to identify opportunity within the business for procuring through more social enterprise.	
	We will establish an IMP Work Ready Programme by 2023, to support individuals into employment.	We collaborated on a new strategic Employment Skills Partnership at Mercia Park. Together with the District Council, Department for Work and Pensions and Winvic Construction, we delivered onsite construction training and a Sustainability and Innovation Hub for educational activities. The partnership also offered work experience for young people, apprenticeships, site visits, an onsite recruitment fair and continuing professional development activities for partner organisations. We are looking to strengthen our offer and started work on a bespoke work experience programme, to be trialled in 2024.	

¹ While these goals are specific to IMP, many of them are commitments that are shared at the wider IM Group level, including paid volunteering opportunities and the delivery of a wellbeing and inclusion strategy. Additional commonalities exist between IMP and IM Group in our commitment to driving a lower carbon economy and integrating sustainability into how we operate.

Our Commitments overview *continued*

Sector	Our commitments ¹	Our progress	2023 status
Place	We will establish an IMP Education Programme by 2022.	The IMP Education Programme was launched in 2022; we continue to be a regional partner for Solutions for the Planet.	»
	The IMP Education Programme will exceed 5,000 meaningful interactions by 2030.	The IMP Education programme has reached 1,028 interactions since December 2021; 343 in 2023 alone.	»»
Planet	We will develop our Net Zero roadmap, setting science-based targets, and having third-party verification of all our energy, business travel and waste data to enable annual reporting of our business's own energy performance.	Independent auditors have completed our second assurance and emissions validation, ensuring we remain aligned with SBTi requirements and disclose emissions accurately.	»»
	All new commercial buildings will be designed to be Net Zero Ready ² and in full Net Zero Operation ³ by 2025, where IMP retains direct responsibility for procuring regulated energy, such as offices with landlord-managed areas.	Improved beyond latest Building Regulations for Energy Performance. We are now establishing a platform for occupiers to provide additional solar panels to facilitate fully Net Zero Operation.	»»
	All new domestic dwellings will be designed to be Zero Carbon Ready ⁴ by 2030, and we will deliver our first Zero Carbon Ready Spitfire homes by 2025.	We are aligning ahead of the Future Homes Standard by building all-electric dwellings, with air source heat pumps, solar capacity and battery energy storage.	»»
	We will also integrate managing energy and carbon into our investment decision-making from 2021 and develop a Net Zero roadmap for our investment portfolio by 2023.	During 2023 we have worked to purchase better quality assets alongside continuing to improve our existing assets, which has resulted in a substantial improvement in the energy ratings of our portfolio. The EPC ratings (by ERV) of B and above improved from 42% to 63%. As at year end, our exposure to A and A* was 40%, up from 15% the year before.	»»
	We will also reduce carbon emissions across the entire development project lifecycle, working in partnership with our supply chain, and by 2025 we will work with our occupiers to minimise energy use and carbon emissions.	We prepare a fully audited, whole life carbon assessment for every development, establishing residual CO ₂ e for construction, operation and end-of-life. Green leases encourage collaboration with end users on reducing in-use emissions.	»»
	By 2022 we will integrate social, environmental and ethical considerations into our procurement, by implementing an IMP Sustainability Supplier Code of Conduct.	During 2023, we introduced our Sustainable Futures strategy to all supply chain partners and hosted specific workshops with key managing agents. These workshops involved brainstorming ways to act on live investment assets within the portfolio as well as discussing industry trends.	□
	We will work with our valued partners to research, identify and trial new innovative technologies on our developments that support environmental sustainability.	We are upscaling and increasing solar panel use to generate clean electricity, using both roof-mounted and car port-integrated arrays. Our supply chain is collaborating with us to improve efficiency and storage of green power.	»»
	We will look to improve resource efficiency during construction, by preventing waste and optimising the use of materials on all developments.	The whole life carbon assessments support the management and mitigation of excess waste; we recycle remaining construction waste and, in 2023, avoided 98% of waste going to landfill.	»»
	The natural environment will be a key consideration on all new developments and throughout the development process.	Blue and green infrastructure are considered on all developments and house building schemes and form an essential element of planning proposals and applications.	»»
	By 2023 we will consider setting and place by adopting the principles of the Building with Nature Standard on all new developments.	We engaged Colliers to conduct audits on several IMP Investments, setting our baseline understanding of biodiversity and current initiatives and identifying opportunities for enhancement. We conducted a reassessment on habitat score at Hinckley Park.	»»»
By 2030 we will support the planting of over 1 million trees in the UK through our developments.	We have planted 177,656 trees to date in the UK through our developments.	»»	

² We align with the UK Green Building Council's definition of Net Zero carbon buildings. See our A-Z of Sustainability for more on this definition.

³ See our A-Z of Sustainability for more on this definition.

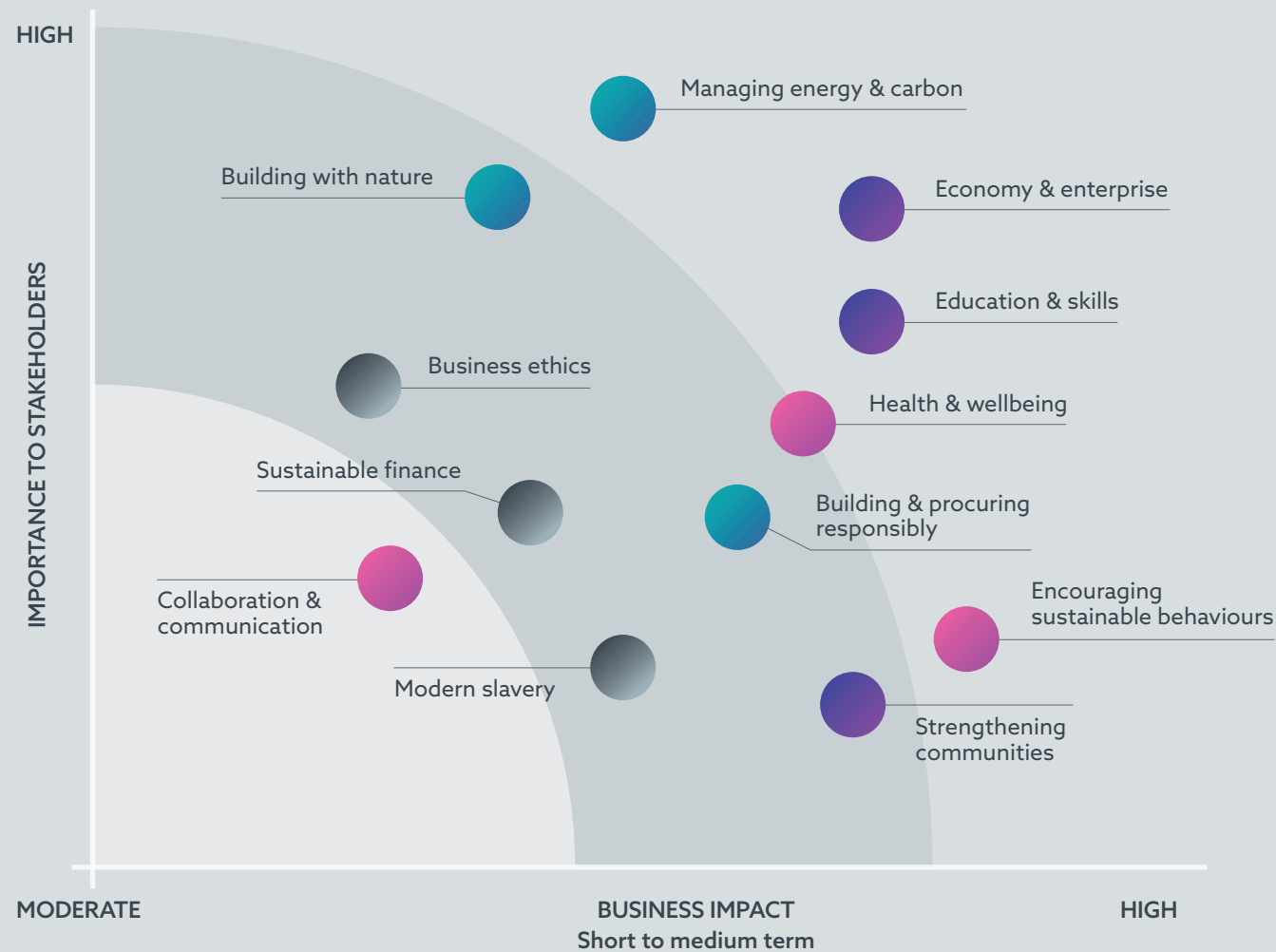
⁴ Goal language revised to align with accepted terminology for dwellings and incoming legislation.

Key
 Complete »
 Making progress »»
 Off track □

MATERIAL ISSUES AND STAKEHOLDER ENGAGEMENT

To leave a legacy of positive, sustainable impact, we need to take action against the issues that matter to our stakeholders and business. That is why, in 2021, we conducted a formal materiality assessment to understand IMP's most significant economic, environmental and social topics.

2021 MATERIALITY ANALYSIS



Our materiality assessment comprised three key steps:

- 1. Identification:** Industry research, peer and competitor analyses, and stakeholder input informed the identification of our key topics.
- 2. Prioritisation:** After feedback from internal and external stakeholders, we used a materiality matrix to prioritise the issues.
- 3. Validation:** Before publishing, our findings were validated by IMP's Leadership Team and other key stakeholders. During the assessment process, topics were tested and modified by an internal cross-divisional committee.

STAKEHOLDER ENGAGEMENT

A core focus of our materiality assessment was stakeholder sentiment, which is why, throughout the process, we engaged several key groups, including occupiers, managing agents and planning consultants. We did so through an online survey as well as convening several dedicated insight groups.

We continually seek feedback from our communities, consultants, local councils, customers and occupiers to understand where we are doing well, what we could improve and the actions we can take to continue evolving our proposition in line with their expectations.



THE ISSUES THAT MATTER MOST

Several key issues were identified as being most material to IMP and our stakeholders and are reflected in our Sustainable Futures strategy:

- Wellbeing
- Social Value
- Innovation and Smart Buildings
- Climate Change Mitigation and Adaptation
- Energy Generation and Renewable Energy
- Biodiversity

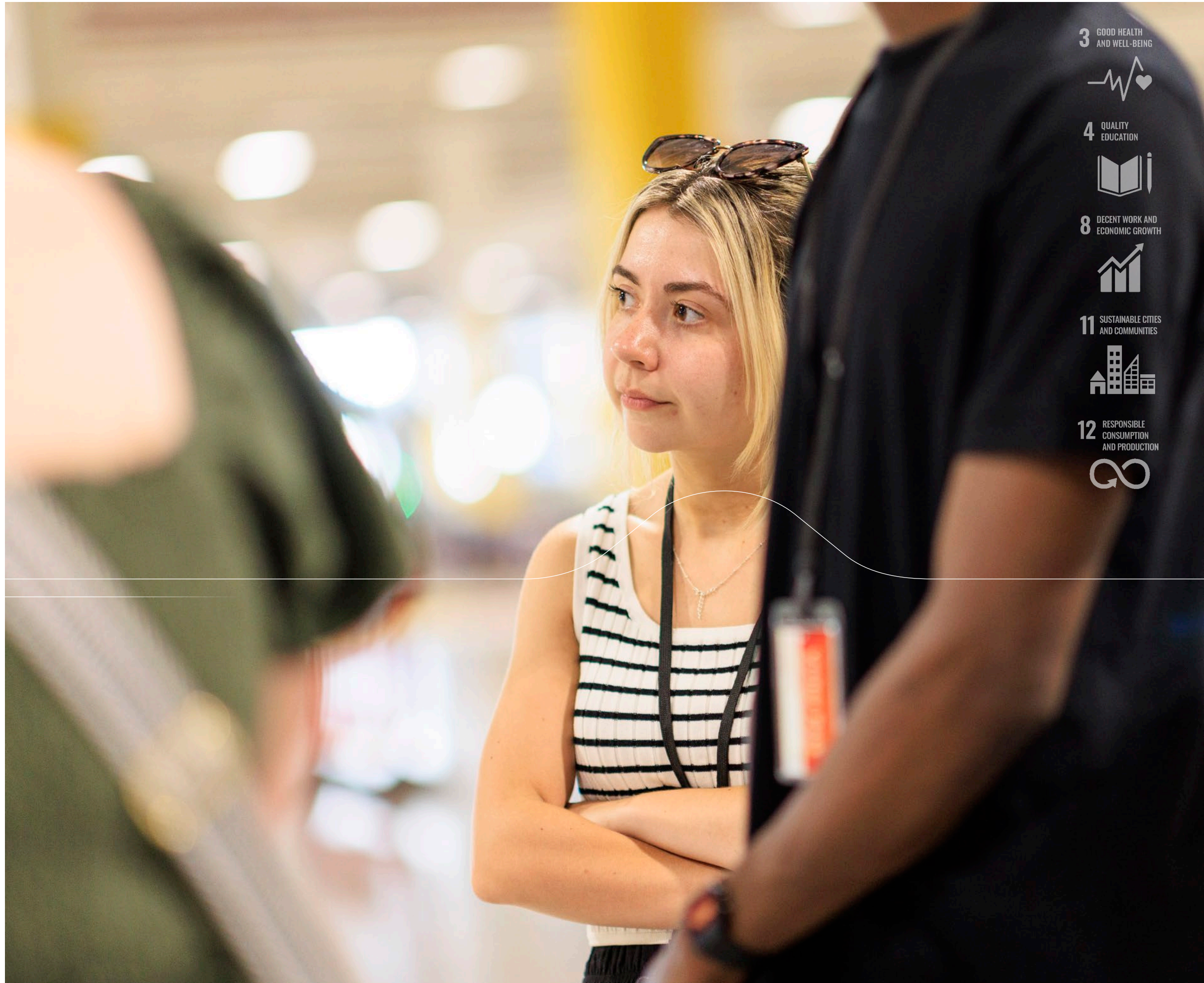
We continue to review IMP's material issues to ensure they remain relevant. To reflect the ever-evolving nature of sustainability and our industry, we are planning to conduct our next materiality assessment in 2025.



People

People are central to our business – from the employees that drive our successes to the customers and occupiers we develop for and the communities we are all a part of. We want to be there for all our people, nurturing talent in a supportive workplace culture while pursuing meaningful collaborations with stakeholders throughout our wider value chain.

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Inspiring sustainable behaviour	24
Collaborating and communicating	27



- 3 GOOD HEALTH AND WELL-BEING 
- 4 QUALITY EDUCATION 
- 8 DECENT WORK AND ECONOMIC GROWTH 
- 11 SUSTAINABLE CITIES AND COMMUNITIES 
- 12 RESPONSIBLE CONSUMPTION AND PRODUCTION 

HEALTH AND WELLBEING

We know people do their best work when they feel healthy, supported and motivated. We work to protect and enhance the health and wellbeing of our employees while upholding a commitment to inclusivity and continuous learning.



ADVANCING HEALTH AND SAFETY

Across our business, we want to continue delivering zero harm and work with external experts to review and update our health and safety policy as needed, most recently in 2022.

We report quarterly health and safety performance at IM Group level and, in 2022, took actions to push IMP's efforts forward. Particularly, we identified the need for a stand-alone health and safety policy, alongside supporting procedures and protocols to ensure company-wide policy adherence. In 2023, we created several documents, supporting arrangements and relevant trainings, including:

- Developing a bespoke policy and procedures manual in collaboration with two external consultants with industry-specific health and safety expertise.
- Appointing an internal Health & Safety Coordinator and ensuring they completed an Institution of Occupational Safety and Health (IOSH) Health and Safety training qualification.

- Updating reporting procedures for building contractors on accidents, incidents and near misses.
- Adding health and safety to all department team meeting agendas, with meeting attendance from the Health & Safety Coordinator.
- Establishing a role-specific health and safety training matrix to ensure we meet health, safety and environment (HSE) standards for training, including on construction design and management, asbestos awareness, IOSH for senior executives, and mental health first-aid training for all company directors and line managers.
- Introducing a health and safety procedure for volunteering activities and events.

The new materials were launched in May 2023, with a mandatory read and review to ensure employees could access and absorb the information. This was followed by two consultation days with employees, our external consultants and the IMP Health & Safety Coordinator.



Our commitments

We will formalise an internal wellbeing and inclusion strategy by 2023.

2023 progress

Together with wider IMG management and colleagues, we have established a company-wide Wellbeing Events Delivery Group (chaired by IMP) to plan and deliver an enhanced and cohesive employee wellbeing strategy.

The group agreed a calendar of events for 2024 as well as a new, dedicated wellbeing budget to ensure delivery.

UNDERSTANDING EMPLOYEE NEEDS

To address employee needs, we must first understand them, leveraging feedback and surveys to engage people on what matters to them. Our Wellbeing and environment, social and governance (ESG) Steering Committee, comprising cross-company employees, meets quarterly to provide updates regarding ongoing governance, discuss survey insights and identify actions for enhancing health and wellbeing.

We conducted our first full staff IM Group-level employee survey in August 2022, with 91% of the IMP team reporting they found their work meaningful and most stating they value their teams, the company and the opportunity they have to make a real difference. The survey also identified some areas for improvement, including wellbeing and training and development. In response, throughout 2023, we have acted to enhance our efforts in these areas, designing a new wellbeing programme that will be delivered in 2024. The next all-employee survey will be in 2025.

Supporting employee wellbeing

We want to help employees feel their best at work, continuously enhancing our workplace culture to deliver flexible working, personal development and learning solutions that support a better work-life balance.

Taking a flexible approach

We recognise the value in letting our people take time off to recharge and, in June 2023, introduced a new holiday purchasing policy. Through this policy, employees can 'buy back' up to five additional days of leave each year, on top of their standard annual leave allowance. The scheme has already proved popular, with nearly 30 employees leveraging the opportunity since June 2023.

IM Well

During 2023, we launched a brand-new internal body to support our wellbeing efforts. The Wellbeing Events Delivery Group – comprising volunteers from across IM Group and chaired by IMP – brings together colleagues to foster collaboration, encouraging employee ownership of our wellbeing strategy and ensuring a bottom-up approach to initiative development. This includes creating a bespoke calendar of mental, physical and financial wellbeing activities and resources, which we will officially launch in 2024. Under the IM Well banner, this calendar will promote regular exercise classes such as boxercise and Pilates, lunchtime healthy eating options and external group activities to bring employees together in improving team wellbeing.

New benefits for our people

Benefits are a core feature of our employee value proposition and, as such, we want to make sure our people are fully aware of the options available. Working with external consultants Avantus, we introduced an improved benefits portal in October 2023.

The new portal lets employees see their benefits package, amend it and access information on topics like pension contributions, salary sacrifice options, company car schemes, online health practitioners, their individual private BUPA healthcare plan and work perks. It also features offers for health, lifestyle, financial products and savings. In the six months after launch, the benefits portal received over 9,500 page views⁵.

Training and development

We want to attract and retain the best industry talent, providing development programmes that help people achieve their professional aspirations. Working with independent experts Syncro, we have created a new appraisal system that will support continuous growth and feedback. Set to launch in 2024, the new process will create additional employee-line manager touchpoints and streamline our approach to setting personal objectives.

The new appraisal system will also support line managers in identifying the training their teams need and want. This information can then be used to determine commonalities in cross-organisational requests and inform a more effective approach to delivering learning opportunities. During 2023, we set the groundwork for this process enhancement by incorporating a keener focus on training and development plans into appraisals; during 2024, we will transform this understanding into effective action with a new training database.

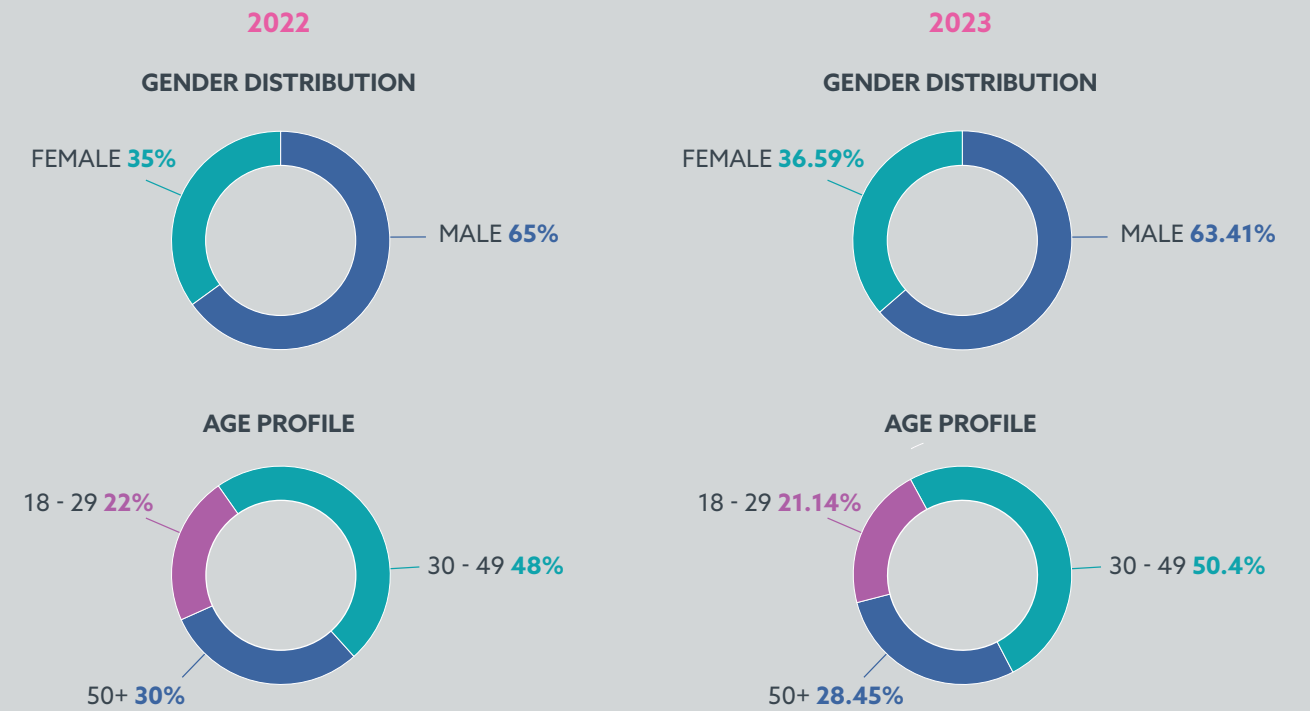
DURING 2023, 23 LINE MANAGERS COMPLETED APPRAISAL DELIVERY TRAINING.

⁵ Figure applies to the collective IM Group.

DIVERSITY AND INCLUSION

We believe in the power of diversity and inclusion to drive innovation. We're committed to ensuring our employees, suppliers and partners feel supported to be their true selves in workplaces where everyone is treated fairly. Change doesn't happen overnight and, recognising this, we are taking a gradual approach to enhancing diversity and inclusion at IMP.

Diversity at IM Properties



INSPIRING SUSTAINABLE BEHAVIOUR

We want to make our properties more sustainable – in how we design and build them but also throughout their operation. To do so, we need to encourage shared understanding and responsibility from our people, customers and occupiers. It’s why we bring them into the continued conversation, sharing ideas to inspire sustainable behaviour.

Our commitments	2023 progress
We will commit to a programme of research with our customers, occupiers and homeowners to understand the best ways to engage them on sustainability, starting in 2022.	We will continue to understand the needs of our customers through a programme of internal and external feedback surveys. Our Investment division has surveyed DHL, FedEx and Gregory in 2023. Spitfire continue to use a programme of customer surveys throughout the customer journey supported by a third party survey following legal completion to align efforts with industry best practices.
We will host an annual Sustainability Day to inspire and encourage customers, occupiers, suppliers and colleagues on sustainability from 2022.	During 2023, we launched our Volunteering Week – an event that builds on Sustainability Day – to engage staff in volunteering opportunities near our projects and headquarters.

OUR APPROACH

With approximately 25% of UK carbon emissions attributable to the built environment⁶, we recognise the role IMP – and our stakeholders – can play in helping advance action against the country’s net zero by 2050 commitment.

Advancing sustainable behaviours across IMP

Sustainable behaviours start from within, which is why we continually strengthen our internal efforts. We maintain membership with organisations such as the Better Buildings Partnership (BBP) and the UK Green Building Council (UKGBC) to gain access to industry collaboration, best practice learnings and innovative solutions to promote energy efficiency, renewable technologies adoption and greener transport options. These memberships also allow us to remain up to date with legislation changes.

During 2023, we onboarded two new people to advance sustainable mindsets at IMP. Simon Seaton-Smith, Director of Innovation and Sustainability, and Matthew Fox, Planning Director, bring with them extensive sustainability and industry expertise and hold positions that are intrinsically linked to our Sustainable Futures strategy. Engaging with teams from across the company, both Simon and Matthew play pivotal roles in embedding innovation, environmental sustainability and social impact considerations deeper into our schemes and developments, today and for the long term.



Exploring what sustainability means to us

To ensure effective climate action, we must align everyone around a shared commitment. In November 2023, Simon partnered with third-party experts SLR Consulting to deliver an employee workshop. The session explored the SBTi and what it means for IMP, engaging people more fully in the work we’re doing to quantify and address our emissions footprint. Read more about how we’re partnering with SLR.

Also during the year, Rob Hemus and Matt Clarke attended a Future of Sustainability event hosted by our partner BBP to inspire professionals looking to develop careers with sustainability at the core. Attendees joined discussions on the skills and knowledge needed to scale sustainability at pace within teams and across organisations.

WE’RE INSPIRING EMPLOYEE ACTION FOR THE PLANET, OFFERING AN INCENTIVE SCHEME TO PROMOTE ADOPTION OF ELECTRIC VEHICLES (EVs) FOR PERSONAL USE. IN 2023, 17 EMPLOYEES USED THIS OPTION.

AWARD-WINNING PERFORMANCE

In June, Spitfire’s Sales Director, Matt Vincent, was honoured as the Emerging Property Person of the Year at the 2023 Insider Midlands Residential Property Awards. In his nine years at Spitfire, Matt has overseen more than 800 deals, worth £440 million, and is an integral member of senior management. This award is a well-deserved recognition of Matt’s achievements and dedication to the industry.



Engaging employees through volunteering

During 2021 and 2022, we hosted internal Sustainability Days to introduce employees to our Sustainable Futures strategy and annual progress. In 2023, we built on this foundation of engagement, expanding it to a full-scale Volunteering Week. Across several days, employees were encouraged to get involved in a range of volunteering activities. From Christmas hamper packing in Solihull to completing a garden makeover for the Community Environmental Trust, we offered options to suit everyone, no matter what their skills or interests.

RESTORING GREEN SPACES

In Wolston village, Warwickshire, a group of Spitfire and IMP employees have helped breathe new life into an old, unattended woodland, transforming it into a community nature walk. Alongside other members of the Wolston Conversation Group, our Social Value Manager and support team organised for employees to help clear weeds and undergrowth, creating a pathway and making the area more usable and enjoyable for residents.

Volunteering Week represents a key part of our wider efforts to give back to local communities. Our employees can take up to 15 hours each year for volunteering and, during 2023, people from across IMP and our supply chain volunteered a combined 828 hours to various causes. We also worked diligently throughout the year to strengthen our partnership with Solihull Council, understanding local needs to inform more tailored and consistent action in the area surrounding our headquarters.



⁶ Source: UKGBC progress report on Net Zero Whole Life Carbon Roadmap, Dec 2023.

Smart technologies

We are always exploring and integrating more innovative technologies to advance property efficiency and help occupiers embrace more sustainable behaviours. For example, in Eckington, Worcester, we have concluded a year-long trial of Wondrwall's renewable energy technology in Spitfire homes.

Through the trial, several affordable homes were fitted with solar panels, battery storage and infrared heating systems designed to reduce energy consumption. Across the year, occupants' energy bills reduced by 52%, saving them over £1,000 on average, while the heating system reduced energy consumption by 42% compared to Building Regulations Standard Assessment Method (SAP)⁷. One home even managed to reach Net Zero for the year – generating more energy through solar than it consumed – showing the impact innovation combined with behaviour change can have on sustainability performance.

Spitfire is also incorporating Wondrwall's smart home system into several Net Zero homes in Fairmont, Bishop's Cleeve. The properties will each feature solar panels with battery storage, smart light switches with Alexa integration and motion detection, and AI-powered energy buying. The setup will enable customers to sell surplus electricity back to the grid while helping their homes achieve an Energy Performance Certificate (EPC) rating of A. It is also predicted to help occupants achieve annual energy bill reductions of at least £1,500 when paired with the appropriate energy tariff.

HOMES THAT TRIALLED WONDRAWALL'S TECHNOLOGIES GENERATED APPROXIMATELY 53% OF THEIR ENERGY FROM ROOFTOP SOLAR PANELS.

Bringing home purchasing to the metaverse

In September 2023, Spitfire Homes won Best Use of Online Tools at the First Time Buyer Readers' Awards 2023 for their innovative online home viewing experience. The virtual reality experience enables customers to create and explore their own digital spaces, as well as letting them explore a fully furnished show home simply by putting on a headset.



⁷ SAP is a Building Regulations-compliant overview of a home's energy efficiency, with scores ranging from A to G. IMP uses SAP version 10.2 to calculate the energy ratings for our dwellings, applying to all homes completed in 2023.

COLLABORATING AND COMMUNICATING

We seek opportunities to listen and learn about the changing needs of our occupiers and local communities. We value feedback on our performance and recognise its value in helping us target continuous improvement. At the same time, we look to collaborate strategically to amplify our capacity for positive impact.



Our commitments	2023 progress
<p>We will carry out post-occupancy surveys with all new customers by 2023. Spitfire Homes continued to engage homeowners post-completion.</p>	<p>In 2023, we launched a new process for Spitfire using the external Home Builders Federation customer satisfaction reporting, which gives us a Recommend a Friend score based on surveys issued eight weeks after completion.</p> <p>Spitfire's score for the 2022/2023 survey year (which runs from 1 October 2022–30 September 2023) was 82.1%, giving them a 4-star housebuilder rating.</p>
<p>We will produce and distribute an annual sustainability performance report, starting in July 2023.</p>	<p>This is our second annual Sustainable Futures report.</p>

OUR APPROACH

Our business is built on relationships and develops through an open and honest dialogue with our stakeholders. Using a mix of surveys, online tools and other engagement approaches, we seek to enhance our understanding of what we can do to further embed sustainability in homes, workplaces and communities.

Customer surveys for enhanced insight

We use customer surveys to understand what we're doing well and where we can improve. Spitfire use a programme of customer surveys throughout the customer journey in order to identify the requirements of our customers and highlight areas for improvement. We issue regular surveys at each key stage of a customer's journey and this is followed by the third party National House Building Council's new homes survey following legal completion to align our efforts with industry best practices. Our Investment division have also carried out occupier surveys with DHL, FedEx and Gregory to further understand their use of buildings within our portfolio, and how we can continue to work together to share data alongside best practice to ensure buildings run efficiently.

SPITFIRE HOMES CONSUMER SURVEY

In 2023, Spitfire engaged over 2,000 homeowners and prospective buyers in the Midlands to understand their opinions on sustainable homes. What we found was that nearly half of respondents looking to move house wanted sustainable features⁸ in their next property; what's more, they were put off buying homes that lacked sustainable features.

In addition, 47% of respondents believed homes without sustainable features will lose value in the next 10 years, while around 31% think those without sustainable features will eventually have to be knocked down and rebuilt. Not only will this insight help us advance our design and development planning going forward, it also paints a clear picture of the greater emphasis the industry as a whole needs to place on sustainability to keep pace with evolving customer expectations.

SPITFIRE RECEIVED A 2022/2023 HOME BUILDERS FEDERATION 'RECOMMEND A FRIEND' SCORE OF 82.1% - A 4-STAR HOUSEBUILDER RATING.



⁸ Includes features like solar panels, smart heating systems, underfloor heating, car charging points and air source heat pumps.

Community engagement

We work to better understand the places we invest in, engaging key stakeholders to understand the issues those locations are facing. It's how we can build a lasting positive legacy and inspire sustainable actions. During 2023, we partnered with Beatfreaks on a research project to understand the sentiments, aspirations and perceptions of residents from Birmingham and North Warwickshire, aged 18-35. Between July and October, we hosted a series of focus groups with local young people to explore topics like sustainability, employment, perceptions of developments and logistics, and use of public space.

The results were then used to conduct a further survey with 400 local young residents. We asked what initiatives or changes, if any, would contribute to a more sustainable community and the results offered some common answers:

- Community funding (48%)
- Access to community space (buildings or open spaces) (46%)
- Education support (43%)

We are using these insights to influence our future plans. To maintain positive, ongoing dialogue, we are also looking to establish a youth panel in 2024 to help us to further understand key issues and topics of importance to young people in Birmingham and North Warwickshire.

76%

FELT THAT **SUSTAINABILITY** WAS IMPORTANT TO THEM

79%

FELT IT WAS IMPORTANT TO HAVE ACCESS TO **OUTDOOR SPACES**

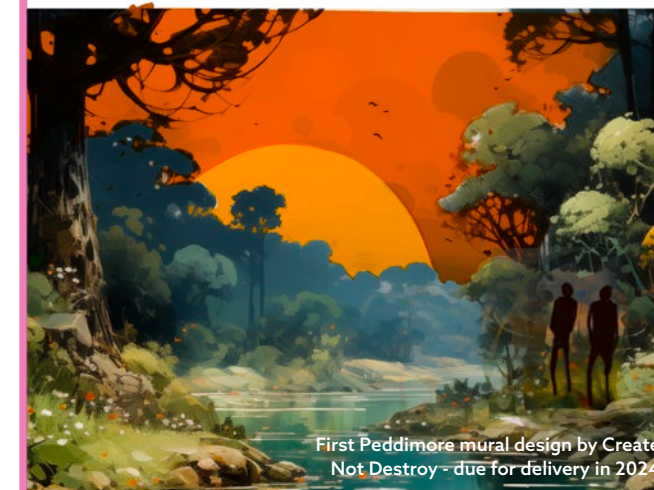
89%

WOULD SUPPORT AND PARTICIPATE IN THE PROVISION OF SPACES THAT ARE MANAGED **BY THE COMMUNITY FOR THE COMMUNITY**

PEDDIMORE ARTWORK ENGAGEMENT

Back in 2018, as part of our public consultation and masterplan development work for our Peddimore site, we established and submitted a Public Art Strategy. Through it, we seek to identify opportunities for commissioning relevant, meaningful art for incorporation into Peddimore, providing something to be enjoyed by residents and visitors alike. The strategy was also developed as an opportunity to further collaborate with local stakeholders.

During 2023, we continued to build towards our aim of realising art projects across the site, putting out a call for art and community engagement projects from local and national artists. In September 2023, we held open days on site for artists to explore the landscape and develop proposals in direct response to Peddimore's outdoor spaces. We also engaged community groups and local schools, like Minworth Primary School and Greenwood Academy, to understand how the art could be inspired by local people and incorporate collaborative design.



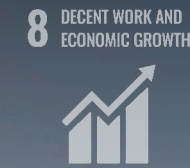
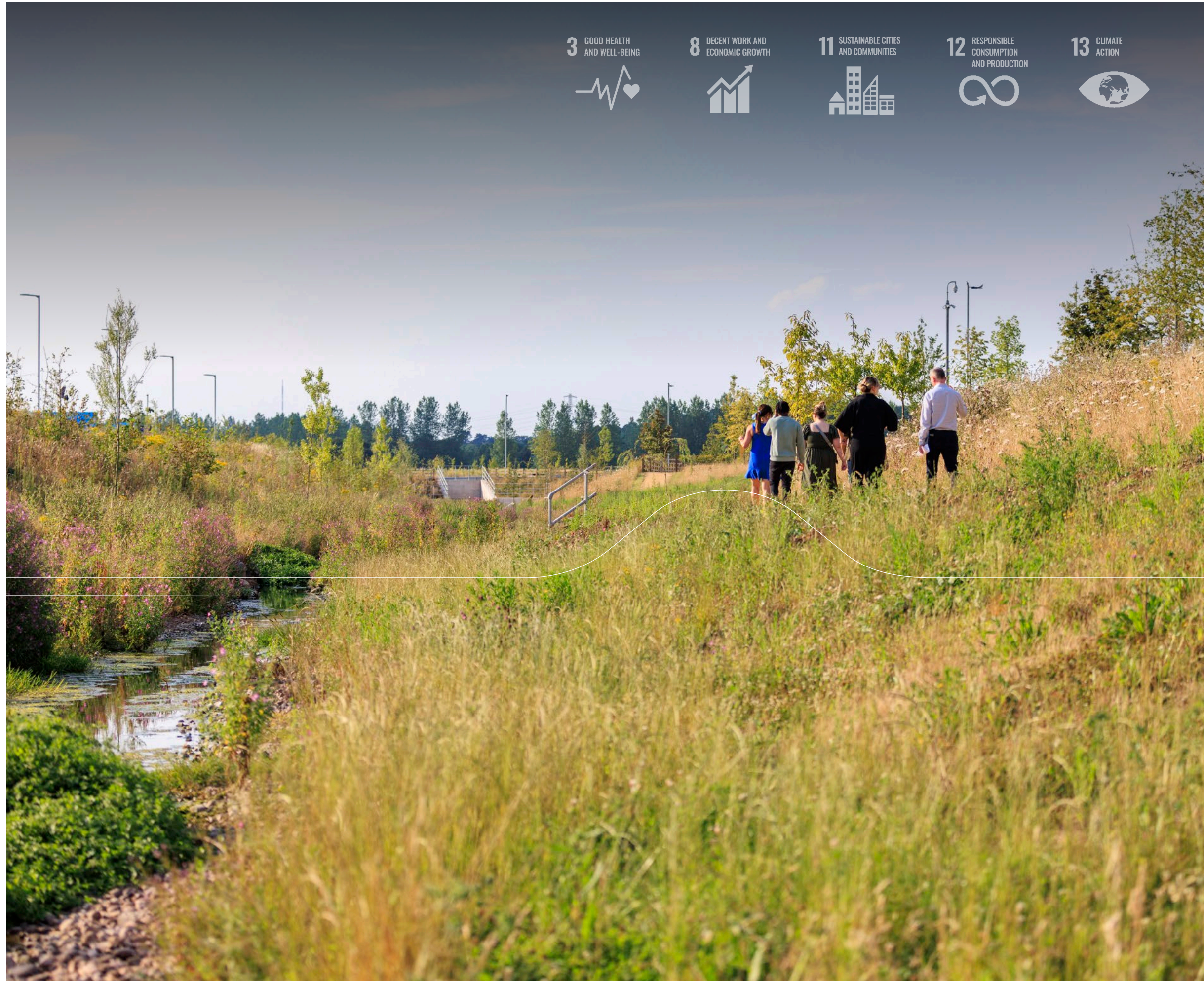
Sustainability report

This is our second annual sustainability report, which we publish as part of our commitment to regular and transparent communication with stakeholders. The reports are made publicly available through our website, as well as shared with key stakeholders, providing accountability for our progress and the actions we're taking to address material risks and opportunities.

Place

We want to make a positive difference in the places where we develop and invest. Wherever we have a presence, we seek to be active community members and builders of a sustainable future through job creation, skills training and local investment. We take a long-term view to community engagement, putting time into genuinely understanding local needs so that we can deliver positive impact that lasts long after our schemes are operational.

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STRENGTHENING COMMUNITIES

Wherever we build, we are joining a community. We want to use that presence for good, harnessing our projects, investments and capabilities to deliver a legacy of lasting positive impact.



Our commitments	2023 progress
We will establish an IMP Community Fund by 2022.	Since launching the IMP Community Fund, we have supported 35 organisations, distributing £80,855 in total funding by the end of 2023.
We will empower our colleagues to support communities, committing two days of paid volunteering per colleague annually.	365 hours of volunteering delivered by IMP and Spitfire staff during 2023

OUR APPROACH

IMP creates homes that foster new neighbourhoods and workplaces that help advance local economies. To maximise project outcomes, we first research the places we invest in and the issues they're facing. In 2023, we began searching for an external organisation to help refine our local needs assessment approach. By bringing an expert partner onboard, we aim to further enhance our understanding to ensure we can effectively address local employment, skills development, community outreach and funding needs. We aim to assess potential partners throughout 2024.

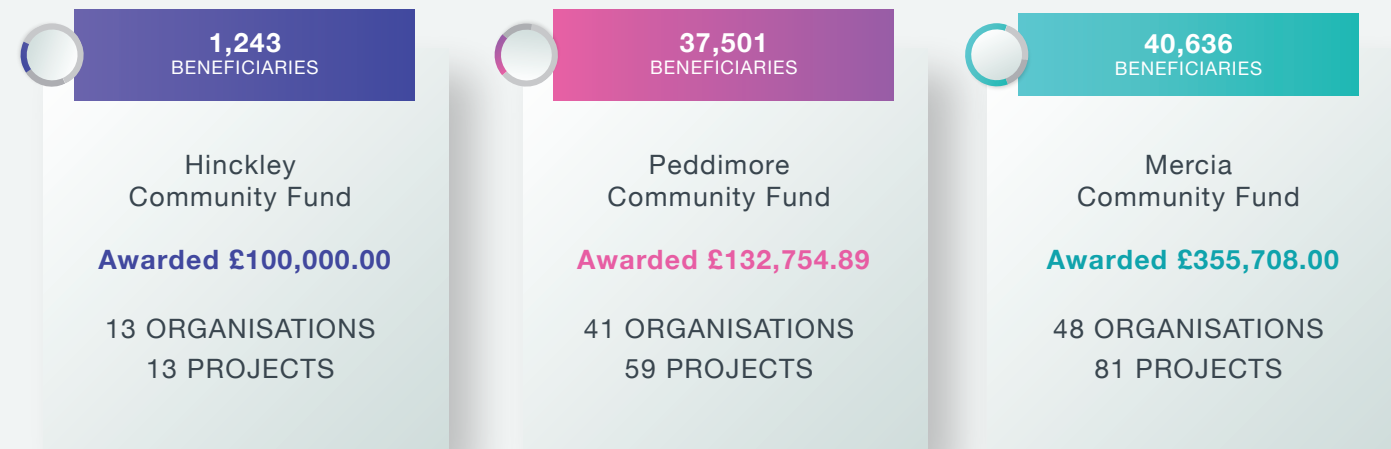
We adapt our support to current and future needs, with our Director of Planning and Communities engaging local communities early in feasibility and planning application processes. To guide this, we have embedded guidance from UKGBC into our community approach – seven steps that ensure social impact is considered at every stage of our development projects. A dedicated Social Value Manager (SVM) supports project teams, engages delivery partners and leads the coordination of our community activities.

Opening the door to community funding

We seek to empower community organisations in areas around our developments and have seen first-hand the tangible difference we can make through funds tied to large-scale, long-term projects⁹. We launch project-specific funds where we believe we have the greatest scope for impact.



Community funding



⁹ Applies to large-scale developments over 1 million square feet.

FUNDING PEOPLE-FOCUSED PROJECTS IN HINCKLEY AND BOSWORTH

When we began developing Hinckley Park in 2018, our community focus was on creating local job opportunities and routes to skills development and training. Since then, our business-wide approach to social value creation has become more sophisticated, more informed by our experiences and is an increasingly central part of how we deliver our sustainability strategy; with that has come a wider focus on delivering community impact across Hinckley and Bosworth.

During 2023, we launched a one-off £100,000 Hinckley Park Fund, which provided grants to 13 local organisations to support their work in strengthening the community, enhancing the environment and promoting positive change. In particular, we chose projects that advance community cohesion, social networks and opportunities for young people and families. In total, our grants helped support 1,243 beneficiaries around Hinckley Park.

Among some of the organisations were:

- Hinckley Homeless Group
- Leicester Animal Aid
- Music for Wellbeing
- Art to Heart
- Hinckley Town Tennis Club
- The Proton Foundation



HINCKLEY PARK



The IMP Community Fund

We want to advance equitable access to funding for more community organisations, whether they are near our large-scale schemes or not. That's why, in 2023, we built on our existing efforts by launching the IMP Community Fund – a broader community fund that delivers grants, outside of project-specific funding, to groups focused on one of three priority sustainability areas: People, Place, Planet.

Administered by the Heart of England Community Foundation and managed by our SVM, funding decisions are made by a panel of employee volunteers from across the business.



HINCKLEY PARK COMMUNITY FUND

IM Properties have donated £100,000 to organisations in the Hinckley area, supporting 13 projects with vital work in the local community.

- 01 Art To Heart
- 02 Cancer Active Recovery Support (CARS)
- 03 Falcon Support Services
- 04 Hinckley Homeless Group
- 05 Hinckley Rugby Football Club
- 06 Hinckley Town Tennis Club
- 07 Leicester and Leicestershire Animal Aid Association
- 08 Music For Wellbeing CIC
- 09 Platform Thirty1 Limited
- 10 Proton Foundation
- 11 Sapcote Memory Hub
- 12 We Care UK
- 13 Without Walls Christian Fellowship
- 14 Burbage Parish Council



A YEAR OF THE IMP COMMUNITY FUND

Since launching the IMP Community Fund, we are proud to have supported 35 organisations, distributing £80,855 in total funding by the end of 2023 for activities benefiting over 41,300 people.

Organisations have included:

- Meriden Adventure Playground Association to help feed the imagination of hundreds of children through a National Playday event.
- Eco Birmingham's new Active Travel Map, which helps connect local communities via safe, low- or no-traffic walking and cycling routes.
- Woodgate Valley Urban Farm to help establish a new Forest School with bi-weekly activities for children struggling in traditional education.
- BSL Silver CIC to help buy resources to make learning sign language more accessible.
- Coventry All Saints – St Anne church to develop a community hub, in partnership with Coventry City Council's Grapevine project, with weekly Stay and Play events for parents and children.



EXEMPLIFYING OUR COMMUNITY SPIRIT

When Senior Planning Manager Ian Deverell lost his grandmother to cancer, he decided to step up and raise money for vital cancer research. Completing a 1,000-mile, solo bike ride from John O’Groats to Land’s End, Ian raised £9,200, donating £6,000 to In The Pink – an organisation IMP has supported since 2020, originally through the Mercia Park community fund – for their breast cancer survivor rehabilitation programme. The remaining £3,200 Ian raised was donated to Cancer Research. To support Ian in his inspiring endeavour, IMP promoted his fundraising efforts and a custom cycling jersey was created, pro bono, by our long-term supplier Tassell Design.

A true testament to his passion, the nine-day cycle, which was partially covered by IMP’s volunteer leave allowance, was just one way Ian exemplified our commitment to community impact. Throughout 2023, he got involved in various other ways, including giving a talk to 250 students at Greenwood Academy – a school near to our Peddimore scheme that we have supported since 2018 – to inspire the next generation of town planners. He also volunteers on the IMP Community Fund panel, helping guide how and where we allocate our funds.

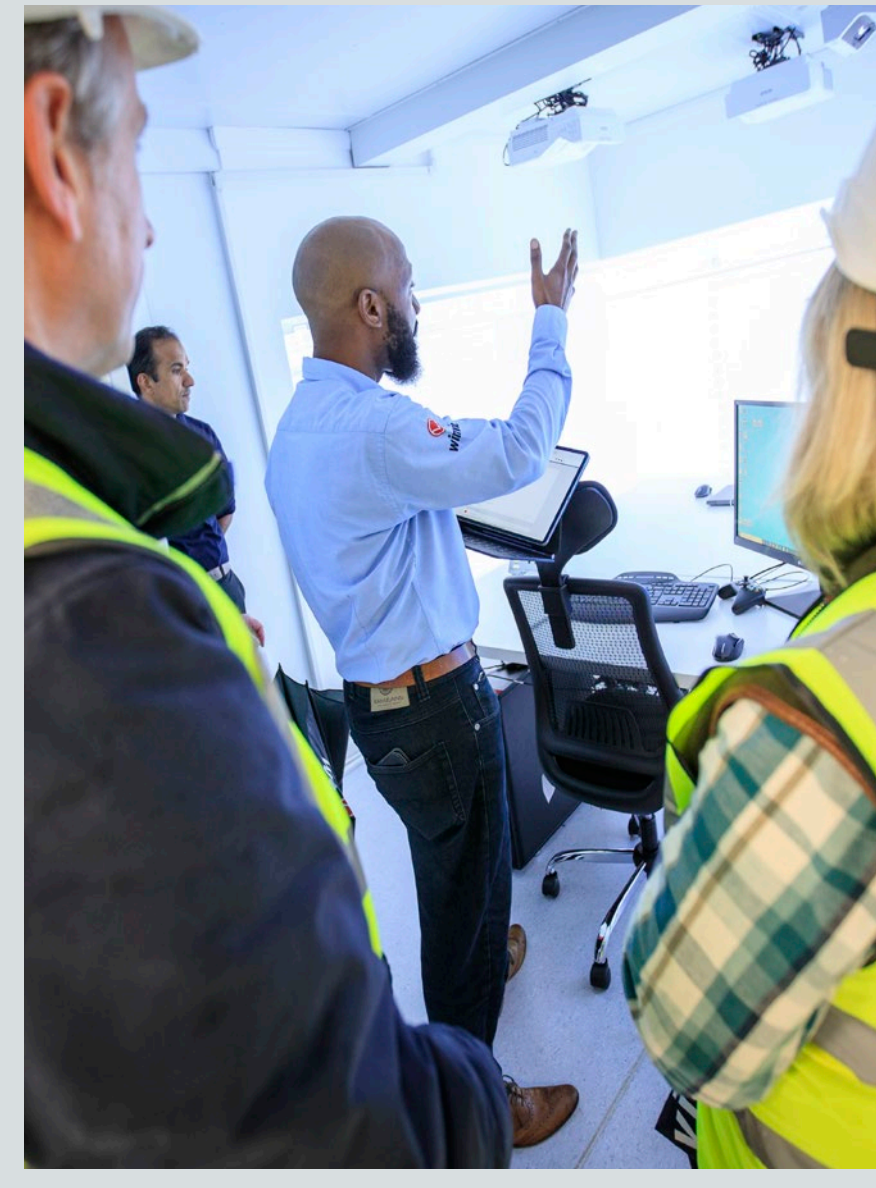


Empowering our people to give back

Our people are passionate about supporting the places where they live and work; we want to help them turn that passion into action.

Inspiring collective action

During 2023, we launched our Volunteering Week to inspire greater employee engagement in community action. We also encourage employees to support communities through local school engagement.



ECONOMY AND ENTERPRISE

Our efforts to support local economies goes beyond bricks and mortar; they extend to creating new jobs and growth opportunities for local people and promising enterprises.

OUR APPROACH

Our suppliers are central to IMP project delivery and, where feasible, we seek to engage local suppliers and contractors, with a particular emphasis on supporting disadvantaged individuals. By doing so, we can help advance local employment, including for small businesses and social enterprises.

Work Ready Programme

During 2022, we launched a pilot of our Work Ready Programme (WRP); in 2023, following a year of learnings and a review of our pilot analysis and feedback, we evolved the WRP into a full-scale initiative to support people into employment. Encompassing a range of upskilling and reskilling activities, the programme aims to increase knowledge, experience and confidence through training, advice, guidance and work placements.

As part of the WRP, throughout 2023, we collaborated on a new strategic Employment Skills Partnership at Mercia Park. Together with the District Council, Department for Work and Pensions and Winvic Construction, we delivered onsite construction training and a Sustainability and Innovation Hub for educational activities. The partnership also offered work experience for young people, apprenticeships, site visits, an onsite recruitment fair and continuing professional development activities for partner organisations.

Similarly, at Hinckley Park, we have partnered with Winvic Construction to play an active role in the community. This includes committing to an Employment and Skills Charter, through which we pledged to provide training and employment opportunities for local businesses and individuals at all stages of site construction. Work at Hinckley Park has included a pop-up employment initiative with a local groundworks contractor and job centre, 'meet the buyer' events and ongoing work with local colleges to encourage more young people to pursue careers in the built environment.

To ensure the WRP is accessible to the wider business, we have actively engaged all business units to understand their individual needs and will be aligning these with our programme offering during 2024.

"Opportunities for local people have been offered and lives have been changed. We use the phrase 'transformational project' - and Mercia Park in terms of its physical presence is certainly that - but IMP with its approach to social value has created an employment destination of choice, with tremendous benefits for our local communities."

Barrie Walford, Economic Regeneration Manager, North West Leicestershire District Council

PURCHASING POWER FOR SOCIAL GOOD

After a recommendation from our existing supplier and social enterprise Nuneaton Signs, we began purchasing stationery from WildHearts Office in April 2023. As a social enterprise that reinvests all their profits into social and environmental initiatives, WildHearts Office is an organisation that closely aligns with our own company values.

From teaching the UN SDGs in schools across the UK to holding the world's largest youth-led sustainability summit, their impact is aligned to sustainable development - locally and globally. And, when we purchase their goods, it means we are transforming essential procurement overheads into tangible social impact.



Our commitments

We will engage with a strategic partner to embed social enterprises into our procurement process.

We will establish an IMP Work Ready Programme by 2023, to support individuals into employment.

2023 progress

We continue to procure office suppliers through the social enterprise WildHearts Office. We are also working with Supply Change to identify opportunity within the business for procuring through more social enterprise.

We collaborated on a new strategic Employment Skills Partnership at Mercia Park. Together with the District Council, Department for Work and Pensions and Winvic Construction, we delivered onsite construction training and a Sustainability and Innovation Hub for educational activities. The partnership also offered work experience for young people, apprenticeships, site visits, an onsite recruitment fair and continuing professional development activities for partner organisations

We are looking to strengthen our offer and started work on a bespoke work experience programme, to be trialled in 2024.

EDUCATION ENGAGEMENT

We believe every child deserves the opportunity to reach their maximum potential. We're doing our part to make this a reality, with an ongoing commitment to support education and young people in our communities.

Our commitments	Progress
We will establish an IMP Education Programme by 2022.	The IMP Education Programme was launched in 2022; we continue to be a regional partner for Solutions for the Planet.
The IMP Education Programme will exceed 5,000 meaningful interactions by 2030.	Reached 1,028 interactions since December 2021; 343 in 2023 alone.

OUR APPROACH

To safeguard the future of our business and industry, we need to continue bringing new and diverse talent onboard. We leverage our projects and investments as opportunities to support life skills and raise the aspirations of a new generation of built environment professionals.

Building futures

The IMP Education Programme encourages employees to support youth education and skills development through student mentoring, CV writing assistance, mock interviews and work experience. We also deliver building tours, career talks and Go Construct sessions, and facilitate connections between students and our suppliers to give programme participants an opportunity to explore the breadth of roles our industry offers.

We partner with local organisations, including the Grace Foundation, to amplify the impact of the programme. In 2023, the Grace Foundation helped deliver mentoring training to four Spitfire employees, each of whom will begin mentoring students in 2024. Having completed similar training previously, another employee began their mentor role during 2023.

"I spent time mentoring a student at Grace Academy Solihull. A big part of why this student was put forward as someone who could benefit from mentoring was him being low on confidence and having issues with attendance. I felt my main aim was to get him talking, try and build up his confidence and encourage him not to limit himself when thinking about his future. It was so pleasing to see the student come on from where we first met, really working hard on studying and gaining a college place that would feed into their aim of being a sports physio. They seemed so focused on achieving in their exams, and seemed much more confident, which was great to see!"

Matthew Clarke, Finance Business Partner, IMP

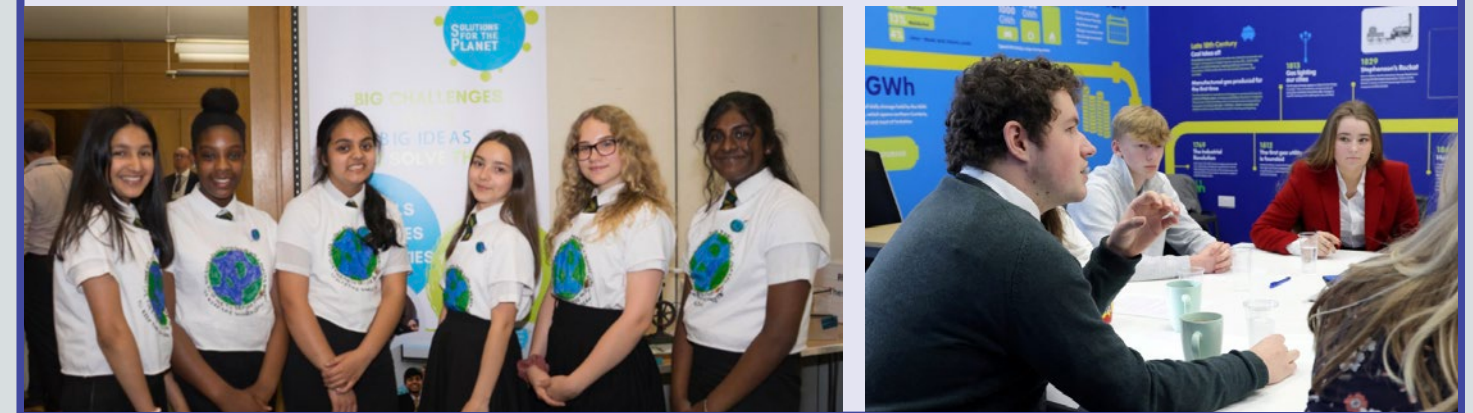
Solutions for the Planet programme

We are proud to be a Midlands Regional Partner for Solutions for the Planet, which engages young people in shaping a more sustainable future. Through it, we are helping to reach more children with STEM education; it also supports our own education programme, as we can introduce Solutions for the Planet to schools surrounding our schemes.

THE BIG IDEAS PROGRAMME

We again supported Solutions for the Planet's Big Ideas Programme in 2023, with nearly 3,000 students submitting ideas and business plans to help save the planet. During the 2023-2024 school year, six employees signed up to the programme, volunteering around 117 hours collectively.

Seven Spitfire and IMP employees volunteered as mentors, with one supporting students at Alderbrook School in Solihull and two mentoring at Hodge Hill College and Greenwood Academy near our Peddimore site. Three other employees committed to being regional judges.



SUPPORTING STUDENTS IN HINCKLEY

Wherever we have a presence, we want to use it for community good. In Hinckley, that has included supporting six local schools through over 191 hours of employee volunteering. Throughout 2023, IMP employees supported career days, facilitated mock interviews for students, conducted site tours and visited schools to share insights and resources to encourage more young people to pursue opportunities in science, technology, economics and maths (STEM) and the built environment industry.

One example of this work is the careers awareness event we ran for Hastings High School at our headquarters, The Gate. Through the event, 16

students were introduced to the careers that exist in our industry. We also gave students a tour of The Gate so they could explore a workplace and see those careers in action.

The students raised specific interest in architecture and planning and so, with support from our in-house planning team, we organised another, more focused session. This follow-up session was supported by architects from our valued supply chain partners UMC – a clear example of how our suppliers help turn our strategy into action. The outcome of this engagement with Hastings High School is that one student is pursuing town planning while another applied for an Architectural Technologist role with a local firm.



Planet

As property developers, we recognise the role we have to play in protecting the natural environment for every generation. We are working hard to reduce our impacts today to ensure our projects are fit for the future, while remaining transparent about the challenges we face and adaptable to the changing regulatory landscape.

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MANAGING ENERGY AND CARBON

With net zero as an ultimate destination, IMP are committed to reaching near-term emissions targets by 2030, in line with SBTi recommendations. We will achieve them through targeted steps to reduce our Scope 1 and 2 emissions, advance Net Zero Ready developments and engage our suppliers and occupiers in increasing building energy efficiency.

Our commitments	2023 progress
<p>We will develop our Net Zero Roadmap, setting science-based targets, and having third-party verification of all our energy, business travel and waste data to enable annual reporting of our business's own energy performance.</p>	<p>Independent auditors have completed our second assurance and emissions validation, ensuring we remain aligned with SBTi requirements and disclose emissions accurately.</p>
<p>All new commercial buildings will be designed to be Net Zero Ready and in full Net Zero Operation by 2025, where IMP retains direct responsibility for procuring regulated energy, such as offices with landlord-managed areas.</p>	<p>Improved beyond latest Building Regulations for Energy Performance. We are now establishing a platform for occupiers to provide additional solar panels to facilitate fully Net Zero Operation.</p>
<p>All new domestic dwellings will be designed to be Zero Carbon Ready¹⁰ by 2030, and we will deliver our first Zero Carbon Ready Spitfire homes by 2025.</p>	<p>We are aligning ahead of the Future Homes Standard by building all-electric dwellings, with air source heat pumps, solar capacity and battery energy storage.</p>
<p>We will also integrate managing energy and carbon into our investment decision-making from 2021, and develop a Net Zero roadmap for our investment portfolio by 2023.</p>	<p>We continue improving EPC's and introduce operational CO2e reduction initiatives.</p>
<p>We will also reduce carbon emissions across the entire development project lifecycle, working in partnership with our supply chain, and by 2025 we will work with our occupiers to minimise energy use and carbon emissions.</p>	<p>We prepare a fully audited whole life carbon assessment for every development, establishing residual CO2e for construction, operation and end-of-life. Green leases encourage collaboration with end users on reducing in-use emissions.</p>

¹⁰ Goal language revised to align with accepted terminology for dwellings and incoming legislation.

OUR APPROACH

Our interim, near-term targets are ambitious; achieving them will require a robust, defined approach. That is why we are engaging our employees, customers, supply chain and external partners on three key areas:

- 1. Reduce direct (Scope 1 and 2) emissions:** Our first step is understanding our current footprint, establishing robust data capture, monitoring, measurement and verification to set the groundwork for quantifiable targets.
- 2. Advance a net zero mindset and ultimate aspiration across all activities:** To achieve our targets, we must nurture a net zero mindset that spans new building design, construction processes and existing building upgrades. This will help guide decisions on onsite renewables provision and high-quality offset requirements.
- 3. Engaging customers and occupiers on energy efficiency:** Our responsibility doesn't stop when we sign the lease or hand over the keys. We intend to leverage new innovations and technologies as they become available; we also look to ongoing education and communication to help occupiers understand how our buildings can help them reduce in-use carbon emissions.

During 2023, we engaged SLR Consulting to help quantify our climate impact and validate our targets, in line with SBTi recommendations. Through doing so, we will be better equipped to target reductions in the areas where there is the greatest scope for progress.

Driving continuous improvement

The concept of Net Zero Construction¹¹ is relatively new, with the industry still aligning on how to define it and what best practice looks like. IMP is part of this evolution, continuously reviewing technologies, techniques and learnings to enhance our understanding.

We apply an 'avoid, reduce, offset' approach to emissions across every project. Our primary initiative is always to inset emissions through whole-life carbon assessments and reducing embodied CO₂e for materials and processes that contribute to upfront emissions.

¹¹ See our A-Z of Sustainability for more on this definition.

¹² Carbon neutrality is achieved by calculating a carbon footprint and reducing it to zero through a combination of efficiency measures in-house and supporting external emissions reduction projects. Our achievement of this status was verified by an independent third-party assessment.

¹³ See our A-Z of Sustainability for more on this definition.

Where avoidance or reduction is currently unfeasible, we retire carbon credits managed by Climate Impact Partners that meet UKGBC Carbon Offsetting Guidance principles.

While carbon offsetting is a short-term solution for IMP – to be used less as innovation advances – we are proud that, in 2022, it helped us achieve 'carbon neutral in operation' status in line with the Greenhouse Gas (GHG) Protocol and ISO 14064¹². This has been maintained in 2023.

NET ZERO PROPERTIES

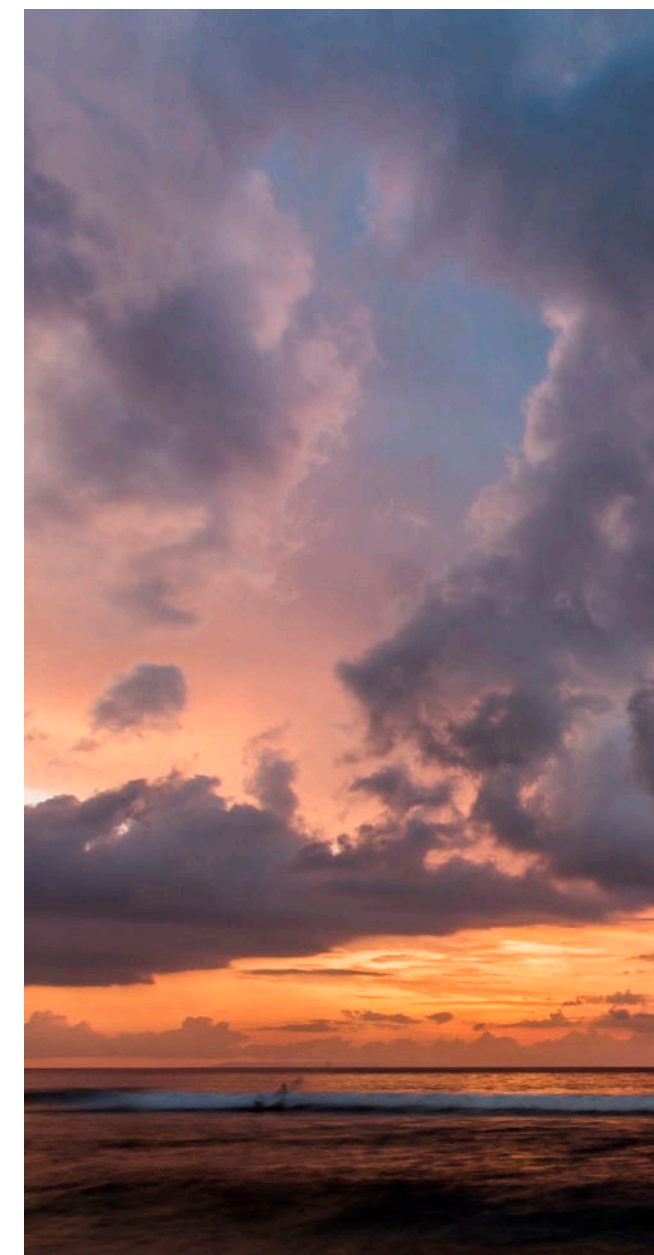
We aim that, by 2025, all our new commercial buildings will be designed as Net Zero Ready and in Net Zero Operation¹³, where IMP retains direct responsibility for procuring regulated energy. To support this, in 2023, we continued working alongside BBP and UKGBC to establish internal benchmarking for developments ahead of new UK Net Zero Carbon Buildings Standards. This voluntary standard – scheduled for release in 2024 – will set clear limits for achieving Net Zero in the built environment (including offices, logistics and residential homes).

OUR EMISSIONS AND ENERGY

Our 2023 carbon footprint is reported annually in line with the GHG Protocol reporting standard as well as Streamlined Energy & Reporting (SECR) policy requirements. We want to improve data quality ahead of future reporting requirements and so, in 2023, we commissioned an independent audit and validation of our GHG emissions.

2023 GHG emissions (UK operations only; metric tonnes CO₂e)

	2022 ¹⁴	2023
SCOPE 1	637	255
Purchased Gas	229	60
Gas Oil	353	147
Propane	7	0
Butane	2	3
Owned transport and Fuel Card	46	44
SCOPE 2 (location-based)	245	359
Purchased electricity (location-based)	245	359
SCOPE 3	120,100	28,036
Capital goods - as built emissions on practical completion		
Manufacture of construction products (life cycle stage A1-A3)	88,294	24,794
Construction site energy use (life cycle stage A5)	25,360	1,088
Upstream transport and distribution		
Transportation of materials to site (life cycle stage A4)	4,057	898
Waste generated from operations		
Construction site waste (life cycle stage A5)	2,205	1,139
Subtotal embodied carbon for project on practical completion in 2023		
	119,916	27,919
Business Travel		
Business travel in employee owned vehicles	147	117
Business travel (rail/taxi/flights)	37	
Total gross emissions (location-based)	120,981	28,649
Total gross emissions (market-based)	121,159	28,672



With Scope 3 emissions accounting for 97.85% of our overall footprint, the results underline the vital importance of working with our customers and suppliers to drive behaviour change and continuous improvement for energy efficiency.

Energy performance

	2022	2023
Energy consumed (kWh)	4,745,313	3,347,927

¹⁴ 2022 figures have been restated following an external assurance of data through third-party consultants SLR.

OUR ACTIONS

We are acting to improve energy efficiency, reduce energy consumption, prioritise onsite renewables and displace imported grid electricity with embedded generation from solar panels. To achieve emissions reductions at source, we are improving building EPC ratings to comply with Minimum Energy Efficiency Standards. We are also investing in more efficient technologies. For example, Spitfire houses incorporate solar panels, battery energy-storage options and EV charging points.

Green lease clauses

In 2022, we introduced 'green lease' clauses for our Investment business to identify strategies for managing property environmental performance. The clauses encourage greater cooperation and data-sharing between landlords and occupiers, with insights clarifying overall business performance and informing future sustainable developments. A new dashboard for smart energy metering data will provide accurate Scope 3 downstream reporting and clarify opportunities to decarbonise occupiers' energy use.

Zero Carbon Ready homes

Spitfire Zero Carbon Ready homes give occupiers the opportunity to achieve Net Zero Operation with ready-to-use energy efficiency features included as standard. At Bishop's Cleeve, Spitfire has designed homes to meet the needs of modern, flexible lifestyles, with sustainability and energy-efficiency as a key focus.



Future-proofing buildings

Currently, embodied carbon associated with constructing a typical new building can be equivalent to 20 years' operational carbon emissions. As such, opting to refurbish existing buildings can deliver significant environmental benefits.

For example, in Yorkton Street, Hackney, we transformed several older buildings into high-quality, sustainably led facilities. Having acquired the three-unit scheme in December 2020, we began investment in 2021 ahead of a full-scale refurbishment in 2022. The upgraded buildings – which serve as last mile delivery facilities – now feature more thermally efficient walls and roofs, rooftop solar panels and EV charging points, as well as a contemporary outdoor seating area with a green wall to enhance occupant wellbeing. And, with 80% of the scheme signed up to prior to practical completion, occupant demand for buildings with strong ESG credentials is clear.

In addition to our progress at Yorkton Street, we have taken further steps to future-proof our [commercial portfolio at our Bourn office in Coventry](#).

SINCE MAY 2023, SPITFIRE HAS HANDED OVER

134

NET ZERO READY HOMES TO CUSTOMERS IN BISHOP'S CLEEVE, KISLINGBURY, OMBERSLEY, HAWKESBURY UPTON AND CANK FARM.

TWO UNITS AT YORKTON STREET ACHIEVED **EPC RATINGS OF A**, WITH THE THIRD ACHIEVING AN

A+

Learn more about how [Spitfire is embedding sustainability into new homes](#)



SETTING THE BAR FOR SUSTAINABLE LOGISTICS

Our Edge Enfield development sets a new standard for sustainable logistics sites, achieving an EPC A+ rating and BREEAM Excellent certification. The site provides up to 127kWh of power through rooftop solar, as well as all-electric temperature control through air source heat pumps.

A green roof helps stabilise temperature, while the site also features six charging points for EVs. As a result of strategic planning and sustainable urban design for drainage systems, the site achieved a biodiversity net gain of over 4,000% compared to the previous land use. The unit has been delivered as Net Zero Ready with capacity for occupiers to be net zero during operation. It also fully complies with the London Energy Transformation Initiative policy.

[View the Edge movie](#)

Adapting to climate change

In line with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations, we have reviewed the physical and transitional climate-related risks and opportunities for our business.

Physical risks

Risk type	Risk threat	Opportunities to mitigate risks
Severe weather events – floods	Damage to property, impact on business operations for occupiers.	Ensuring all development projects and housing schemes consider flood risk. Incorporating sustainable drainage systems and other flood risk-mitigation measures into landscape design.
Severe weather events – extreme heat	Damage to buildings, overheating and occupier comfort.	Considering nature-based solutions and future-proofing assets to prevent overheating and ensure occupier comfort.

Transitional risks

Risk type	Risk threat	Opportunities to mitigate risks
Technologies	Low-carbon products, particularly materials, aren't developing at pace to meet demand or are cost prohibitive.	Increasing use of smart building technology to reduce energy demand and CO ₂ emissions. Incorporating nature-based solutions into project design. Leveraging onsite renewables and smart grid technologies.
Policy	Future Homes standard – gap between requirements and supply chain and skill capabilities. Increased government regulations mean older assets may become stranded, low value or obsolete.	Early action from Spitfire Homes to implement air source heat pumps and other smart building technologies. Supporting development of trusted and competent supply chains to meet increasing demand. Improving whole-life performance of buildings, including replacing old assets. Collective ownership and investment in energy efficiency between asset owners and occupiers.
Market	Occupier demand for high-quality, energy-efficient and low- or zero-carbon buildings, which is leading to increased demand for new builds. This is more costly and less sustainable than retrofitting existing facilities.	Supporting the transition to a low- carbon- built environment and continuing to ensure our asset portfolio reflects occupier demand, wants and needs.
Legal and reputational	Inferior carbon offset schemes and bad press represent reputational risks and limit scope for timely action.	The IMP offset scheme provides high-quality, independently verified 'gold standard' offsets.



BUILDING AND PROCURING RESPONSIBLY

We're reimagining property designs for sustainability, researching innovative techniques to reduce our environmental footprint. And, through it all, we're partnering closely with our suppliers to drive responsible procurement practices.

Our commitments	Progress
By 2022 we will integrate social, environmental, and ethical considerations into our procurement, by implementing an IMP Sustainability Supplier Code of Conduct.	During 2023, we introduced our Sustainable Futures strategy to all supply chain partners and hosted specific workshops with key managing agents to discuss trends and routes to take action on live investment assets within the portfolio.
We will work with our valued partners to research, identify and trial new innovative technologies on our developments that support environmental sustainability.	We are upscaling and increasing solar panel use to generate clean electricity, using both roof-mounted and car port-integrated arrays. Our supply chain is collaborating with us to improve efficiency and storage of green power.
We will look to improve resource efficiency during construction, by preventing waste and optimising the use of materials on all developments.	The whole life carbon assessments support the management and mitigation of excess waste; we recycle remaining construction waste and, in 2023, avoided 98% of waste going to landfill.

OUR APPROACH

Responsible building means carefully considering how we use resources – reducing the volume we use, pursuing sustainable options and minimising waste. We set clear standards around our procurement process to assess and select suppliers that share our approach to sustainability.

We also maintain modern slavery and anti-bribery and corruption policies, which help ensure we align with industry best practices and continue operating in compliance with regulations.

Supplier code of conduct

Strong supplier partners are key to our success and, where possible, we look to work with local businesses to meet our procurement needs. To support this, we establish clear ESG expectations, working with contractors, suppliers, managing agents and other supply chain partners to ensure they understand those expectations and our wider strategy.

During 2023, we introduced our Sustainable Futures strategy to supply chain partners. As part of this, we asked managing agents to share learnings from initiatives they have supported on other sites to inspire how we can move our own efforts forward. We also engaged environmental consultancy Middlemarch to host a workshop for managing agents on biodiversity to highlight what we're doing to understand and manage onsite nature.

As we move into 2024, we will work on creating a suite of new, standardised documents that will help us communicate our planet targets and expectations for how suppliers and lead contractors can support us in achieving them.

Environmental compliance

We strive to be an environmentally responsible business, aligning with – and going beyond – all relevant regulations and statutes. This includes managing our building and procurement to minimise the risk of pollution while looking to improve resource efficiency during construction by preventing waste and optimising material use.

To ensure continuous improvement, we monitor our environmental performance through our environmental management systems and regularly report on progress.

Technical innovation

We are always researching, identifying and trialling innovative technologies to incorporate into our developments. For example, today, Spitfire fits homes with EV charging points as standard. All Spitfire homes are also built to modern standards, with high EPC ratings and future-proofed features like air source heat pumps. In fact, since 2021, Spitfire has committed to install air source heat pumps in all new homes instead of fossil fuel-based gas connections or gas-powered boilers. By doing so, they can pre-emptively meet the UK Government's Future Homes Standard, which comes into effect in 2025.

Spitfire houses that feature the Wondrwall net zero solution and Daikin UK heat pumps reduced energy bills between February and May 2023 by 81% – from £567 to just £135. They also have zero carbon emissions and an EPC rating of A, outperforming the incoming Future Homes Standard. And, with the Wondrwall Energy Service Contracts, solar panels, inverters, EV charging points and home energy management systems can be supplied and installed for free, minimising customer costs.

Sustainable site upgrades

Refurbishing Bourn

We partnered with contractor Overbury to refurbish the Bourn office in Coventry – our first ever Net Zero Ready building. We worked together with Overbury to source, where possible, tradespeople and workers from within a 30-mile radius – minimising transport-related emissions. By retrofitting an existing site rather than building a new one, we managed to avoid 14,000 metric tonnes of CO2e and offset 1,130 metric tonnes – resulting in embodied carbon savings of 87%. We sustainably sourced timber, gypsum and glass, and used air comfort paints. In total, this resulted in 97% of waste being diverted from landfill.

In recognition of the upgrades, Bourn received external acknowledgements, including:

- an EPC rating of A (up from a previous rating of D);
- a BREEAM Very Good rating; and
- Considerate Constructors Scheme credits for local labour recruitment efforts.

HINCKLEY, ENFIELD AND PEDDIMORE ALL HIT BREEAM EXCELLENT RATINGS

AIR SOURCE HEAT PUMPS ARE FOUR TIMES MORE EFFICIENT THAN GAS BOILERS, SIGNIFICANTLY REDUCING CO2 EMISSIONS AND SAVING HOMEOWNERS ON ENERGY BILLS¹⁵. WITH FURTHER DECARBONISATION OF THE UK GRID, THESE BENEFITS ARE SET TO INCREASE.

15 Source: Spitfire Homes

BUILDING AND THE NATURAL ENVIRONMENT

We act as stewards of the land we develop and are committed to considering the natural environment in all new developments and throughout the development process.

Our commitments	2023 progress
The natural environment will be a key consideration on all new developments and throughout the development process.	Blue and green infrastructure are considered on all developments and house building schemes and form an essential element of planning proposals and applications.
By 2023 we will consider setting and place by adopting the principles of the Building with Nature Standard on all new developments.	<p>We engaged Colliers to conduct audits of several IMP Investments, setting our baseline understanding of biodiversity and current initiatives and identifying opportunities for enhancement.</p> <p>We conducted a reassessment on habitat score at Hinckley Park</p>
By 2030 we will support the planting of over 1 million trees in the UK through our developments.	We have planted 177,656 trees to date in the UK through our developments.



OUR APPROACH

We work to protect biodiversity and play an active role in habitat enhancement, always looking for ways to improve the natural environment when approaching a new property development or enhancing our existing portfolio.

We have begun adopting Building with Nature Standard (BwN) principles for all new developments. The sites being developed are often agriculture conversions with limited or poor-quality biodiversity. In a bid for net neutral or positive impact on nature surrounding our development sites, our team of specialist landscape architects and ecologists

consider key species and habitats of regional relevance, leveraging ecological surveys to support their work. This begins early in the project process with an assessment of sites' current biodiversity scoring. We can then vary our site designs to minimise impact and achieve a positive biodiversity outcome.

By adopting BwN principles, we are aligning our approach with the UK Government's biodiversity net gain (BNG) strategy, which became mandatory in November 2023. Through the strategy, property developers must deliver a minimum of 10% BNG. We are aiming to go beyond this, targeting 15% BNG, where viable, for our new developments.

UNDERSTANDING OUR BIODIVERSITY BASELINE

To enhance local biodiversity, we must first understand the existing ecosystem. That's why we engaged Colliers to conduct audits of several IMP investments¹⁶, setting our baseline understanding of biodiversity and current initiatives across each, as well as identifying opportunities for enhancement. Across the assessed developments, initiatives such as integrating insect towers, beehives, and bird and bat boxes were identified as opportunities to enhance onsite biodiversity.

As of 2023, we have also conducted a reassessment at one site - Hinckley - to understand our progress one year on. First assessed in 2022, Hinckley has followed a set regime of grass maintenance to encourage biodiversity protection. As a result, we are pleased to note a 0.72% in Hinckley's habitat score¹⁷ (36.10 in 2023 versus 35.84 in 2022) and a 100% increase in hedgerow habitats. We plan to reassess the site in 2025 to reviewed continued progress.

¹⁶ Includes: Bourn (assessed December 2022); Coleshill Manor Campus (assessed December 2023); Fuse (assessed January 2023); Goya Business Park (assessed January 2023); Hinckley (assessed June 2022, reassessed July 2023); Holla (assessed January 2023); Mercia Park (assessed August 2023); and 5-9 Yorkton Street (assessed December 2022).

¹⁷ Based on the Building with Nature Standard



Creating green spaces

Research shows that nature can have a positive impact on physical and mental wellbeing. Recognising this, at our Peddimore scheme, we have undertaken landscaping efforts to enhance the outdoor spaces. The site features 2.5 miles of wraparound parkland, which is accessible for occupiers, local residents and

visitors and is suitable for cycling as well as walking and running. We have also reinstated a green corridor and brook that run through the site, creating valuable space for people and nature alike. To bring a sense of community spirit to life on the site, the outdoor spaces will also feature locally commissioned artworks.

A HEALTHIER, MORE PRODUCTIVE COMMUNITY

We want to help more people enjoy the rich heritage, natural beauty and biodiversity that surrounds Peddimore with a new initiative that will encourage walking, cycling and more public transport. A pioneering Green Travel District (GTD) has been developed in partnership with key stakeholders to support the surrounding area, with a vision for less congestion, less pollution and fewer accidents as well as healthier, safer, more productive communities.

The GTD is a collaborative effort between Birmingham City Council, Royal Sutton Coldfield Town Council, Warwickshire County Council, IMP, the Langley Consortium and Transport for West Midlands. Together, the partnership will ensure the necessary infrastructure, policies and supporting initiatives are in place for delivery.

IM Properties has already introduced a new footbridge over the A38, and we plan to improve connections to local rail stations and the canal towpath. Two new bus services have also been launched to serve the Peddimore site, and the first occupants, Amazon, have created a Travel Plan detailing actions to promote sustainable travel to their staff.

“Sustainable travel that prioritises walking, cycling and public transport is central to the Peddimore vision, connecting local people in Birmingham, Royal Sutton Coldfield and neighbouring North Warwickshire with new employment opportunities. We’ve created a striking landscape setting that sensitively links with the surrounding area and provides attractive, safe and accessible active travel routes. This contributes to an engaging and welcoming workplace, supporting the wellbeing of employees and visitors while minimising impact on the environment.”

David Smith, Planning & Communities, IM Properties



Partnerships and Practices

We believe doing business responsibly contributes to a fair and just society, which is why we uphold a strong governance foundation on which we build our sustainability efforts. At the same time, we recognise the fundamental role partnerships play in achieving our strategy and wider industry success – as only by working together can we deliver far-reaching positive impact.

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4 QUALITY EDUCATION



8 DECENT WORK AND ECONOMIC GROWTH



11 SUSTAINABLE CITIES AND COMMUNITIES



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



PARTNERSHIPS

We aim to find and develop strategic partnerships with organisations that share our commitment to addressing some of today's most complex sustainability challenges.

OUR APPROACH

We're strongest working together, collaborating to accelerate the adoption of innovative solutions that benefit society and the planet. By learning from each other, we can drive best practices and inspire cross-industry innovation for low-carbon living.



We contribute to industry progress through various key partnerships with industry peers, charities non-governmental organisations and social enterprises.



We are a gold leaf member partner of the UK Green Building Council (UKGBC), a global network of 700+ Green Building Councils working to transform the places people use every day. IMP is also involved in the Embodied Carbon Task Group of UKGBC, which is responsible for defining the embodied carbon benchmarks, and inputting into the setting of embodied carbon limits.



We are members of the Better Buildings Partnership (BBP), a not-for-profit collaboration of the UK's leading commercial property owners. Among other actions, our Investment Team has completed a 'sustainability in real estate' training course and contributed to BBP's real estate environmental benchmark database - helping benchmark sector-wide energy performance.



For the emissions we cannot avoid or reduce, we invest in high-quality carbon offsets. Climate Impact Partners is our trusted industry partner for voluntary carbon offsets. We work with them to identify suitable, independently verified UK and international carbon removal projects that align with our sustainability framework.



The Grace Foundation is funded by our parent company IM Group. It exists to transform young people's lives through holistic education. Our employees participate in the foundation's school programmes to help enhance students' personal development, wellbeing and career aspirations.



The Heart of England Community Foundation supports local giving and community investment across the West Midlands and Warwickshire. The Foundation endorses our social value initiatives by administering the IMP Community Fund, as well as some of our project-specific Community Funds.



SLR are independent experts in sustainability solutions and have been working with IMP to audit and validate our GHG emissions. The data will help to lead the move towards our net zero ambitions.



Solutions for the Planet is a social enterprise that works to make sustainable practices commonplace to help build a world where every young person is equipped with essential skills that benefit people and planet. IMP are regional partners of their award-winning Big Ideas Programme, which connects students with local businesses to start conversations around a sustainable future while educating them about the many opportunities within the STEM sector.

CORPORATE GOVERNANCE

We aim to lead by example, with strong governance in place to help us manage risk now and for the future.

OUR APPROACH

Integrity is one of our core values, and being a trusted partner is important to us. We believe that clear policies, strong governance structures and clear lines of communication with our stakeholders, external experts and partners will enable us to deliver on our 2030 sustainability commitments, while continuing to challenge and evolve our thinking.

Sustainability oversight

IMP is governed by an IMP Leadership Team, which is headed by our Managing Director, Tim Wooldridge. This team is responsible for overseeing delivery and management of our 2030 sustainability framework, reviewing sustainability performance, managing

budgets and holding IMP accountable for progress. Sustainability updates are shared at the beginning of monthly management meetings; an additional quarterly Sustainable Futures meeting is attended by the management team and key business members that lead on each strategy pillar.

We have established sub-working groups to help drive continual focus on and delivery of our strategy commitments. These groups comprise colleagues from various divisions to encourage cross-business collaboration.

At the IM Group level, an ESG Board sets the Group's long-term ESG strategy. Each business division is responsible for delivering against the commitments that relate to their business. By splitting responsibility this way, we give ownership to those best placed to achieve our ambitions.

Managing risks

Our governance structure helps foster accountability, transparency and continuous improvement. Our policies and processes are intended to minimise risk and support informed decision-making, to ensure we're operating responsibly. We maintain a comprehensive risk management process that is overseen by our Executive Board (the Board). Our Director for Compliance and Group Data Protection shares quarterly legislation updates with departments to ensure a proactive approach to relevant policy development and impact management.

We have robust cybersecurity measures in place to ensure we responsibly manage data and cyberthreats, investing in advanced technologies and protections to continuously strengthen our systems.

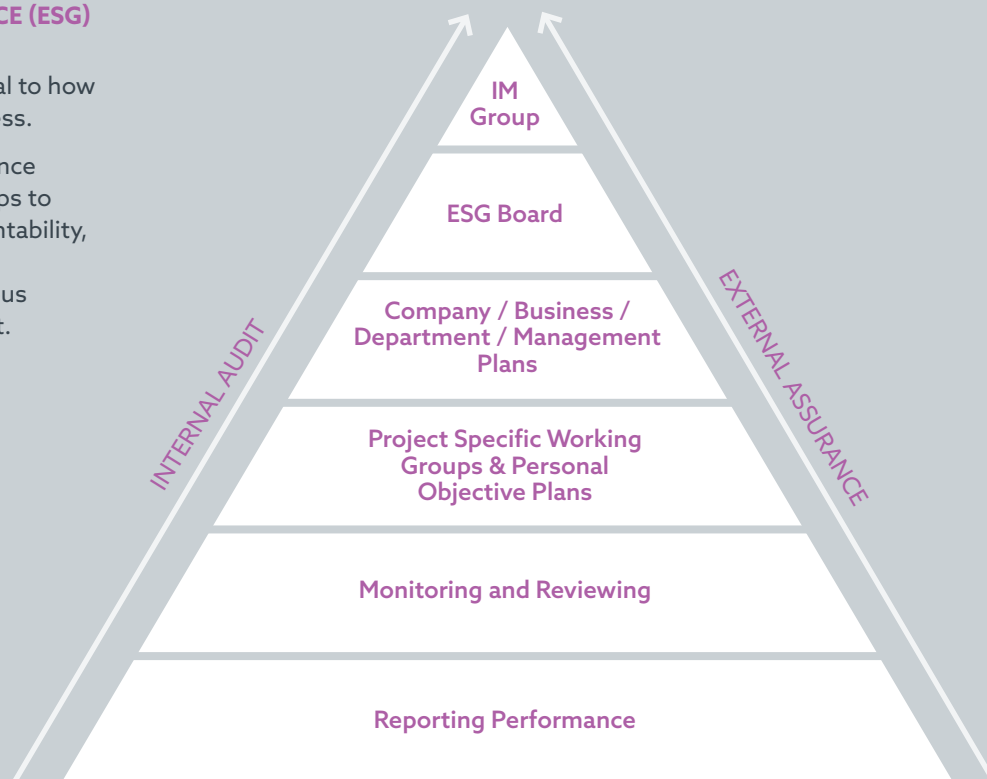
Following the identification of potential cybersecurity risks in 2022, throughout 2023, we increased business measures to improve and tighten online security. This included introducing regular access and phishing testing for employees to reduce system exposure to threats. We also continued delivering annual training and test exercises that focused on data protection.



APPROACH TO ENVIRONMENTAL SOCIAL GOVERNANCE (ESG)

ESG is integral to how we do business.

Our Governance structure helps to foster accountability, transparency and continuous Improvement.





IN 2023, NEARLY 90 EMPLOYEES FROM ACROSS SPITFIRE AND PROPERTIES COMPLETED CORPORATE CRIMINAL OFFENCE TRAINING ONLINE.

ETHICS, TRANSPARENCY AND COMPLIANCE

We provide our people with clear policies, processes and training on key areas of risk to promote a shared culture of responsible business attitudes and behaviours.

OUR APPROACH

Our core values of integrity, commitment, respect and togetherness shape behaviours in our business and guide everything we do. We work to foster an environment where people feel confident speaking out, safe in the knowledge their concerns will be addressed. Our Business Code of Conduct encourages all employees to be vigilant in identifying unethical practices and reporting concerns.

All new starters receive awareness training and an introduction to relevant policies and processes; follow-up training is delivered depending on role and seniority. Our responsible business policies and procedures keep us in compliance with relevant regulations. They are readily accessible to all employees and are reviewed annually or following any incident or legislative updates.

Commitment to human rights

We are committed to protecting the human rights of people across our company and extended supply chain. We maintain a zero-tolerance position on modern slavery and human trafficking – a position we outline in our annually updated [Modern Slavery Statement](#).

IMP engages a large, diverse supplier network, both UK based and international. To help prevent human rights issues in this network, we have identified the supply chain areas more at risk of human rights abuses. During 2023, we established a business risk register through which each supplier was assessed for instances of gang slavery in the supply chain by the Slave Free Alliance, our independent partner. Equipped with these insights, we were able to identify and analyse our main business risk areas for modern slavery.

Whistleblowing

We want our people to feel safe and supported in voicing concerns about behaviours, bribery or corruption, as established in our anti-bribery and corruption policy. Employees wishing to raise issues can reach out to line managers or the IM Group Human Resources Team. We maintain a defined whistleblowing policy at the IM Group level, which assures employees that whenever they make a report, it will be treated in the strictest confidence.

Compliance training and monitoring

All employees are required to complete learning modules on key areas of risk including:

- The Bribery Act
- Anti-money laundering
- General Data Protection Regulation (GDPR)
- Corporate criminal offence
- Modern slavery

Employees are also briefed on safety and our Code of Conduct policies annually. In addition to these, we will develop, as required, further training, policies and processes to support ongoing implementation of our Sustainable Futures strategy.

To support shared responsibility for data protection, all new employees are given an initial overview and training on GDPR from our head of risk within their first week of employment. Throughout 2023, all employees completed GDPR training. This was supported by more specific training sessions for our sales, marketing, HR and finance teams who handle personal data.

Verification Statement

IM Properties has commissioned SLR Consulting to provide independent assurance of the data and information contained within this Annual Sustainability Report.

A copy of the SLR Independent Assurance Statement is available to view [here](#) or by scanning the below QR code.



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