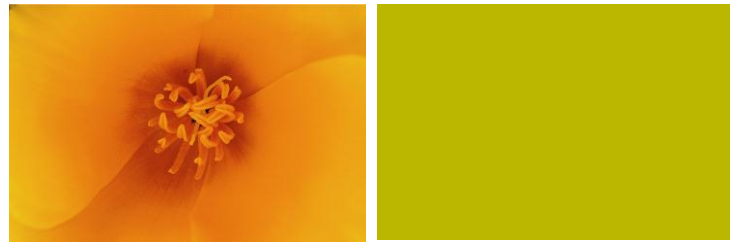


ERM and Sustainability

Our Approach



Sustainability Approach

The Board of Directors and the Executive Committee of ERM recognize the company's unique position and consequent responsibility to continue to build and leverage our leading position when it comes to sustainability. We can only do this with the commitment and support of the entire company, complemented by the leadership and resources needed to support this effort.

As the first step in this process, we are setting out our Sustainability Approach. This document should be read in conjunction with our Sustainability Policy, which together outline the Sustainability Program (Program) at ERM.

Whilst there are many great things that we are doing around the world to minimize our impact and improve our sustainability performance, our aim is to create a fully integrated Program that in time will become a routine part of who we are and what we do. This Sustainability Approach is intended to outline how we plan to make ERM the leading global sustainability performer across our sector.

Our Commitment

Sustainability at ERM is a commitment to supporting socio-economic development that meets the needs of the present without compromising the ability of future generations to meet their own needs. This includes minimizing society's impacts on the environment such that it can support those future needs while promoting social and economic development that allows all communities to enjoy these benefits going forward.

As a business, we aim to create long-term shareholder value by balancing the necessary financial performance of the company with the impact on and the contributions we make to the environment and society. We believe that these can and should be mutually beneficial and our aim is to ensure that this is the case at ERM.

As a leading sustainability consulting company, we are uniquely positioned to contribute to the environment and society through the expertise and energy of our employees worldwide. We aim to create a framework for each individual at ERM to contribute through the work they do, through the various programs and initiatives we support, through involvement in the ERM Foundation and in our personal lives. It starts with personal actions relative to how we manage our own footprint, which ultimately influences the decisions we make as a company. As advisors, we are able to influence the business decisions of our clients within the scope of work requested by those clients. Collectively, our view is that these combined actions will have a positive impact on the planet.



Overall, ERM will:

1. Show leadership through the depth, breadth and quality of our services and by contributing to the broader sustainability agenda via thought leadership.
2. Contribute directly to society and the environment through the ERM Foundation's projects and initiatives. This includes direct financial contributions and pro-bono time which leverages the leading expertise and resources that we have as an organization in this field.
3. Actively work with suppliers and contractors to improve their sustainability performance, in keeping with this Approach, and our Policy.
4. Help clients understand the impact of their businesses in terms of environmental and social issues. With their support, we will assist them in identifying relevant issues and opportunities and, in doing so, help them to:
 - a. Improve their business processes to minimize their impacts and maximize the benefits of their operations,
 - b. Develop new processes and products that respond to changes in resource availability and in regulatory, reputational and customer demands, and
 - c. Create sustainable outcomes for their businesses and stakeholders.
5. Ensure that our own interactions with the environment and the communities in which we live and work, and the choices we make, reduce our environmental footprint and contribute to more sustainable outcomes.
6. Lead and manage the business in a way that enables us to generate sustainable profit growth that provides sound returns for shareholders and provides the resources to enable us to achieve our wider sustainability goals over the longer term.

Implementing our Approach

We intend to achieve our sustainability goals by implementing the following key steps:

1. Engage with employees across the company to seek input to our goals and Program and to share best practices with respect to environmental and social issues.
2. Measure and report publicly on our environmental and social performance and move towards integrated analysis of financial and non-financial performance indicators, in order to drive more sustainable business performance.
3. Benchmark ERM's environmental and social performance against other leading professional services firms. We will engage with key external stakeholders to understand their perceptions of our performance and to help ensure we remain focused on the sustainability issues and opportunities that are most material to ERM.
4. Contribute 1% of our profits towards sustainability via the ERM Foundation.
5. Create a working environment that enables and encourages every individual to achieve their full potential and, in doing so, make their own personal contribution to making the world a better place.

We will support implementation of the Program by preparing and implementing plans to ensure that we achieve our goals in the following seven main areas: Clients, People, Health and Safety, Business Conduct and Ethics, Environment, Community and Thought Leadership. With respect to these we will:

Clients

- Work with clients in all sectors in assisting them to solve their sustainability issues.
- Aim to add value to our clients' performance by applying technical, professional and consulting skills to help them achieve the best long-term business outcomes.

People

- Provide a supportive and progressive work environment to build diversity in our employees across all management levels and functions that reflects the communities within which we operate and the clients with whom we interact.
- Create and maintain a friendly and transparent work environment that is free of harassment and discrimination, where individuals and their cultures and customs are respected and valued.
- Act with fairness and integrity in all of our interactions.
- Continue to create a culture of continuous learning and personal development and use the ERM Academy as the primary vehicle to create and deliver this within the organization.

Health and Safety

- Provide the framework, resources, training and leadership to ensure the safety of our employees and all associates with the aim of achieving zero harm.
- Create a culture that encourages the awareness of the need for a reasonable work-life balance and supports an approach within which all employees can achieve such a balance.

Business Conduct and Ethics

- Build and maintain the highest ethical standards in all that we do both within the company and in our dealings with other parties.
- Create awareness of and provide training and monitoring of our conformance with the company's Code of Business Conduct and Ethics (The Code), including insider dealing and anti-bribery and corruption.

Environment

- Minimize waste and optimize re-use, and where appropriate, re-cycling of resources.
- Reduce the company's carbon footprint by deliberately selecting low-carbon alternatives for travel, meetings and communications wherever practicable, and finding innovative ways to reduce energy use and switch to lower carbon energy sources in the offices and facilities we use.
- Improve the direct and indirect environmental performance/outcomes from the offices that we occupy, including siting offices in locations which are accessible to low-carbon transport.

Community

- Encourage employees to engage with the communities in which they live and work to raise awareness of and encourage more sustainable lifestyles.
- Encourage and support employees in evaluating and reducing their own sustainability “footprint” both in their personal and working lives.
- Support employees’ involvement in the ERM Foundation, The Low Carbon Enterprise Fund and their projects around the world to raise awareness of and make a direct contribution to the environment and communities in which we live and work.

Thought Leadership

- Further increase our profile in key organisations contributing to the search for solutions on the key sustainability challenges.
- Encourage employees to seek innovative and integrated solutions to key sustainability challenges, and to share this knowledge with other professionals, clients and industry organizations.

Our Sustainability Approach outlines how we plan to make ERM the leading global sustainability performer across our sector. We feel that our implementation objectives, as outlined herein, will help us deliver on our goals related to Clients, People, Health and Safety, Business Conduct and Ethics, Environment, Community and Thought Leadership.

November, 2010. Amended May 2011