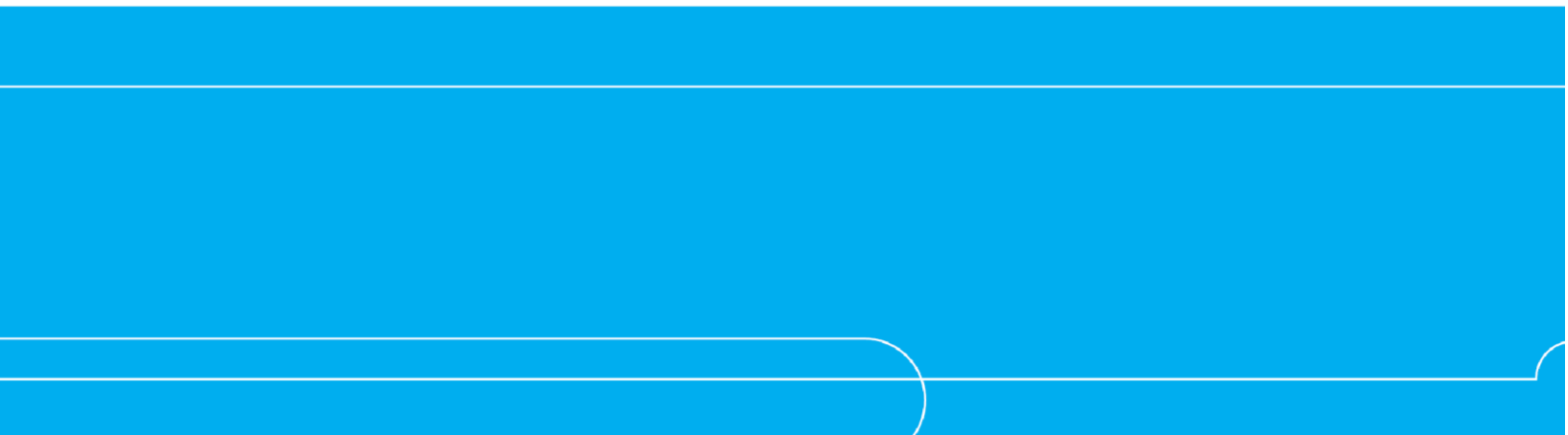




Environmental Policy and Practice

January 2022



ENVIRONMENTAL POLICY STATEMENT

VolkerFitzpatrick Limited is a multi-disciplinary construction contractor operating in the United Kingdom. We are committed to maintaining high standards throughout our operations, with particular regard to avoiding and minimising adverse environmental impacts of all company operations. This policy document also applies to WoollensBrook Homes Limited and the WoollensBrook Group Limited group of companies, which are under common management. Further arrangements for its implementation are detailed within VolkerFitzpatrick company processes, procedures, and site management plans.

VolkerFitzpatrick will strive to continually improve our environmental performance through the reduction and control of waste, reusing and recycling materials, prevention of pollution, protection of local environmentally sensitive locations, and conserving natural resources.

Specifically, we are committed to:

- Maintaining an Environmental Management System (EMS) compliant with the requirements of BS EN ISO 14001:2015 and implementing this EMS throughout our project activities and fixed office locations
- Complying with relevant environmental legislation, corporate and other requirements to which VolkerFitzpatrick subscribes, e.g. client environmental requirements, Considerate Constructors Scheme, construction codes of practice, or trade associations
- Establishing and reviewing quantifiable environmental objectives and targets according to the nature of our activities, business and other legal requirements, including the reduction of waste, water and energy consumption and our carbon footprint, seeking year on year improvements.
- Developing site-specific Environmental Management Plans to mitigate adverse environmental risks, opportunities and impacts such as noise, dust, odour, waste and emergency situations, and taking into consideration local community concerns and the control of hazardous substances
- Wherever possible influencing project design by offering solutions to reduce environmental impact, or provide an overall positive impact
- Considering 'whole life impacts and / or circular economy principles' during material selection and procurement for a project wherever we have influence.

Prime concerns:

- 'Circular Economy' to replace reuse and recycling
- All products and materials are considered a resource, and when no longer needed, they are reused, recovered or regenerated to prevent single use.
- Minimising the adverse impacts of our operations on local communities, wherever we have an influence
- Working with our suppliers and subcontractors to improve both parties' environmental performance
- Providing appropriate environmental information and guidance to employees and others working on behalf of VolkerFitzpatrick as well as leading in the creation and adoption of best practice
- Continually improve the environmental management system to enhance environmental performance
- Protect the environment by considering climate change and doing what we can through mitigation, adaption, and protection of biodiversity and ecosystems

All employees and others working for VolkerFitzpatrick are required to comply with this policy. In particular, by cooperating and carrying out activities in such a manner that does not endanger the environment. It is the responsibility of VolkerFitzpatrick management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerFitzpatrick, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerFitzpatrick website, Workspace, noticeboards and reception areas or is available on request.

Richard Offord
Managing Director

January 2022

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INTRODUCTION

The construction industry is a major consumer of the earth's resources and produces vast quantities of construction and demolition waste. It affects the environment in which we will live and work in the future. The road, building, rail and infrastructure projects we construct become part of the landscape, making us responsible for their environmental impacts.

VolkerFitzpatrick takes this responsibility very seriously. Caring for the environment has been part of our culture for many years and every working day we genuinely endeavour to work in line with the highest environmental principles.

The way in which VolkerFitzpatrick identifies and subsequently manages external and internal issues that are relevant to its purpose and its strategic direction is described within operational procedure Q19 *Determining the Context of our Organisation*.

Assessing context, together with the management of relevant issues arising, allows assurance of the business' ability to achieve the intended result(s) of its environmental management system.

VolkerFitzpatrick core values define the organisation's ethics and guide decisions, actions and behaviours, which drives the desire to achieve the very best delivery of service and product.

VolkerFitzpatrick fully supports the aims and objectives of the Environmental Protection Act 1990, together with associated statutory provisions, and will cooperate fully with the requirements of the Environment Agency (EA) / Scottish Environmental Protection Agency (SEPA) / Natural Resources Wales (NRW), Local Authorities, and other regulatory or enforcing bodies.

Everyone working in the construction industry has a special and shared responsibility for the environment. The Board of VolkerFitzpatrick is committed to maintaining high environmental standards throughout the company's operations. The company's aims stated in this document are to secure, so far as is reasonably practicable, the environmental wellbeing of employees and others, including the general public, who may be affected by our operations.

Formal amendment to this document is the responsibility of the Head of Sustainability.

The purpose of this document is to outline the Environmental Management System (EMS) operated by VolkerFitzpatrick, which is based on the requirements of BS EN ISO 14001:2015. The EMS is complementary to our Quality and Occupational Health & Safety Management Systems.

This document serves as a cross reference between the requirements of ISO 14001, and other environmental documentation in use such as the company procedures and details contained within respective Site Management Plans.

This policy document shall be made available to all employees and any other interested parties. Staff appointed responsible for the management and implementation of the VolkerFitzpatrick Environmental Policy will ensure that a copy is displayed in a prominent position at all VolkerFitzpatrick temporary and permanent offices.

It is intended to assist every individual and organisation working with VolkerFitzpatrick in understanding the environmental considerations, which should influence them in:

- Sound working practices, especially in preventing pollution and ensuring proper waste management
- Operating procedures designed to encourage waste minimisation and re-use of materials
- Implementing innovative solutions that provide a better environmental outcome
- Standards of handling and storage of construction materials, particularly those of a toxic nature or containing hazardous substances
- The procurement and use of materials and products, especially oils, glues, paints, preservatives and other materials, which may contain pollutants
- Selection of recycled materials
- The use of sustainable resources

Construction activities shall be carefully planned to avoid unnecessary nuisance, disruption of natural habitats, destruction of trees and other landscape features. Proper safeguards for the protection of features of particular historic or conservation significance are especially important. Commissioning procedures for services shall be clearly defined to prevent any risk of pollutant emissions during handling and testing. Decommissioning procedures shall be equally well defined.

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1. PRIME CONCERNS

Each day we deal with a number of environmental issues that relate specifically to our industry. The key areas of concern are:

WATER POLLUTION

As defined in The Water Resources Act 1991 covering controlled waters and all watercourses and water in underground strata.

NOISE POLLUTION

Particularly where it may affect the quality of life for people living and working in the vicinity, as well as those people on the site.

AIR POLLUTION

Where it poses a risk to people on site, in the vicinity or further afield.

SUSTAINABILITY

Which involves balancing the seemingly conflicting needs of social, economic and environmental aspects of a project. Environmental sustainability is concerned with protecting, conserving and enhancing both biodiversity and the environment, by reducing waste, preventing pollution and by using water and other natural resources as efficiently as possible.

VolkerWessels UK (VW UK) People-Planet-Purpose sustainability framework, launched in 2020, commits us to a Decade of Action whereby we will use the 9 themes in the strategy to grow responsibly, with respect for communities and the natural environment, and to leave a legacy we are proud of.

RESOURCE USE

Local communities value their surrounding environment and whilst working in their communities we shall look for opportunities to enhance environmental protection and education, we will look at the use of social enterprises within the supply chain to optimise resource efficiency while providing benefits to local communities. Review of wasteful practices which make inefficient use of materials and consumables, both in the office and on-site.

WASTE MATERIALS AND EFFLUENT

As defined in the Environmental Permitting Regulations and Hazardous Wastes Regulations (not applicable in Scotland).

CONTAMINATED LAND

Its increasing use for re-development poses special problems and requires particular consideration for its remediation.

REUSE AND RECYCLING

The reuse or recycling of materials, in accordance with industry guidelines and relevant environmental legislation.

ENERGY CONSUMPTION

The environmental impacts of energy use are numerous from initial extraction, production and transport through to conversion, consumption and disposal of waste products. Inefficient energy use or wastage at temporary and fixed locations, including use by plant and equipment, is a concern throughout our activities.

CARBON FOOTPRINT

Measuring and reporting our carbon footprint and making year on year improvements.

BIODIVERSITY

Which encompasses the whole variety of life on earth. It includes all plant and animals species. It is not restricted to the rare or threatened species but includes the whole of the natural world from the commonplace to the critically endangered. We aim to conserve biodiversity on all projects by promoting good practice in relation to wildlife.

2. ORGANISATION AND ARRANGEMENTS

2.1 Arrangements for Implementation of This Policy

Our aim is to plan activities and implement control measures to protect the environment, ensure compliance with relevant statutory provisions and client requirements associated with our works. We seek to do this in such a way that we avoid the need for complaint or issue of enforcement (improvement or prohibition) notice, or prosecution.

These requirements and our management controls are detailed within a specific *Site Management Plan* prepared for each project and our fixed operational locations.

The company will achieve the aims and objectives of this policy by:

- Mitigating the environmental impact of our operations by paying particular attention to the concerns of the local and wider community that could be affected
- Minimising use of the earth's resources through appropriate reuse or recycling procedures, as well as using materials from renewable sources wherever practical
- Monitoring water and energy consumption
- Selecting offices, and establishing site facilities, which utilise water and energy saving technologies
- Applying best appropriate environmental standards at all of our sites and offices wherever we have an influence
- Trialling innovative technologies and solutions to see where these can be embedded into our day-to-day activities
- Encouraging environmental awareness among staff, suppliers and subcontractors, by working with companies whose environmental attitude reflects our own, and increase awareness by appropriate training
- Sharing company and industry best practice across VolkerFitzpatrick projects
- Being environmentally forward thinking by reviewing our policy in line with the latest environmental concerns as they unfold in the everyday world
- Seeking alternative solutions where we have influence over the design elements of our projects, evaluating alternatives with reduced environmental impact where possible
- Assessing our environmental aspects and impacts, together with objectives and targets which are identified and recorded in accordance with company procedures
- Addressing site specific environmental aspects and impacts prior to carrying out any activities on site
- Obtaining prior consent to certain activities being carried out, where it is our responsibility to do so
- Maintaining compliance to relevant environmental legislation

2.2 Leadership

Leadership and commitment with respect to the quality of the services and products provided by, and the effectiveness of the quality management system used by VolkerFitzpatrick, is displayed down through the various levels of senior management. From the VolkerFitzpatrick Board, to the Senior Management Team, on through business unit and operations senior management, support specialists, and through line management functions, to team leaders.

Performance against the requirements of the Environmental Management System is regularly monitored and supported by leadership via Senior Manager's Tours, Project Reviews, Business Briefings and specifically promoting continual improvement.

2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.3 Responsibility for Environmental Management

ISO 14001 uses the term 'top management' to identify a number of key responsibilities with regard to environmental management. The roles that fall within VolkerFitzpatrick's 'top management' for the environment are shown below.

- Managing Director
- Divisional Managing Directors
- Operations Directors
- Pre-Construction Directors
- Project Director
- Commercial Director
- Health & Safety Director
- Head of Sustainability
- VolkerWessels UK Corporate Responsibility Director

'Top management' responsibilities for the environment include:

- Developing the environmental policy and objectives for VolkerFitzpatrick and ensuring that the correct organisational structure and resources are in place to support these goals
- Promoting the policy and objectives to employees to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall environmental objectives
- Ensuring our focus is on client requirements
- Ensuring the EMS is implemented to meet the needs of VolkerFitzpatrick, its clients and other interested parties
- Reviewing the EMS periodically
- Identifying ways in which to improve the EMS
- Appointing a management representative to monitor and report on the development, performance and improvement of the EMS

Different roles have varying levels of authority with regard to our EMS, and are explained as follows:

Managing Director

The Managing Director (MD) in coordination with the Board Director responsible for environment management is ultimately accountable holding overall responsibility for the operations of VolkerFitzpatrick, from developing long term strategy for the business to overseeing its day-to-day activities.

Divisional / Project / Operations Directors

Responsible to the Managing Director for:

- The safe delivery of all VolkerFitzpatrick contracts
- Overseeing and supporting the effective implementation of the EMS and liaising with clients to ensure their satisfaction
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the EMS
- Accepting their individual role in providing environmental leadership and engaging active participation of workers in improving environmental performance
- Directing management under their control to implement the environmental policy at all times
- Cooperating with the HSES team to ensure proper communication exists at all levels
- Ensuring adequate planning is undertaken to provide appropriate resources, training and systems of working
- Ensuring the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treating the environmental management of sites under their control as a matter of the highest importance

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)**2.3 Responsibility for Environmental Management (Continued)****Contracts Management / Site Management**

It is the responsibility of Contracts / Site Management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company's procedures for dealing with subcontractors and ensure proper cooperation and coordination takes place between the various parties who may share the workplace / site
- Provide an overall Environmental Management Plan for each project, making an adequate assessment of the risks involved and ensuring that systems of work and method statements are produced, followed and reviewed in line with the EMS
- Ensure activity and / or substance-specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring an induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for environmental management and that they have understood its requirements
- Liaise with others as applicable and support initiatives for environmental representation
- Report all environmental incidents to the appointed Environmental Manager, carry out investigations, make recommendations to prevent reoccurrence and ensure this information is effectively communicated
- Arrange environmental inspections and audits with the appointed Environmental Manager
- Ensure that weekly health, safety and environment inspections are carried out
- Implement the advice given by the company's appointed Environmental Manager
- Attend environmental training arranged by the company

General Site Foremen / Gangers

It is the responsibility of Foremen and Gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of environmental protection as it applies to particular construction operations
- Encourage the workforce to work in an environmentally acceptable and tidy manner and where necessary, disciplining offenders
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Environmental Managers
- Cooperate and liaise where appropriate with other contractors' site supervision

Health & Safety Director

The Health and Safety Director leads a coordinated approach to all environmental management in consultation and direction from the Head of Sustainability.

EMS Management Representative - Head of Sustainability

The Head of Sustainability is the appointed Management Representative for environmental management and has the authority to take any action necessary to ensure that environmental management is maintained. Formal amendment to the EMS is the responsibility of the Management Representative. Reporting to the Managing Director, it is the responsibility of the Head of Sustainability to:

- Ensure the effective use of the HSES department and its' resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- Assist the Managing Director in setting realistic goals for the continual improvement in environmental performance
- Develop the EMS to achieve the goals set
- Ensure the goals set are periodically monitored to agreed standards
- Ensure the company is audited against the standards detailed in the EMS

2. ORGANISATION AND ARRANGEMENTS (CONTINUED)**2.3 Responsibility for Environmental Management (Continued)****Environmental Management - HSES Team**

For the purposes of clarification under BS EN ISO 14001:2015, environmental management is not outsourced. Dedicated Environmental Managers are directly employed by the operational divisions of VolkerFitzpatrick.

In addition to this, VW UK Corporate Responsibility provides strategic direction, performance management, occupational health, IMS management, technical services and compliance support to all of the VW UK companies.

Divisional HSES Managers

The Heads of HSES for Building and Infrastructure report to the Health & Safety Director who leads a coordinated approach to all Environmental Management with the Head of Sustainability. Senior H&S Managers in turn report to their divisional Head of HSES. In addition to the duties detailed for an Environmental Manager below, both roles are responsible for effective allocation of environmental support across operational divisions within their designated remit.

Environmental Managers / Advisors

Reporting to the Head of Sustainability, Environmental Managers are part of a divisional HSES team responsible for ensuring effective implementation of the EMS. As a technical specialist they provide support, guidance and training.

The responsibilities of an Environmental Manager / Advisor are to:

- Play a key part in improving the environmental performance of our activities
- Inform, guide and support the workforce and in doing so create workplaces with a positive attitude to environmental management
- Visit sites regularly and monitor performance in relation to the policy and procedures
- Discuss and plan the implementation of future works with respect to the environment
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerFitzpatrick in communications with the EA / SEPA / NRW, Local Authorities and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where environmental incidents occur, and make recommendations to prevent recurrence
- Advise of appropriate environmental training requirements
- Ensure that VolkerFitzpatrick's environmental management documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Environmental Management and Assessment (IEMA), the Chartered Institution of Wastes Management (CIWM) and the Chartered Institute of Ecology and Environmental Management (CIEEM)
- Identify opportunities for improvement and share best practice from across the business and industry

Rail Standards and Compliance Manager

Reporting to the Health & Safety Director is responsible for:

- Establishing the rail specific EMS requirements in line with BS EN ISO 14001
- Working in close collaboration with the IMS Manager to ensure legal, sector specific, and other requirements are integrated within the EMS

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.3 Responsibility for Environmental Management (Continued)

Corporate Responsibility Director

The Corporate Responsibility (CR) Director is responsible for the implementation and development of sustainable business practices throughout VW UK shared services and business units, to maintain compliance to corporate, legal, and stakeholder requirements. Reporting to the VW UK CEO, the responsibilities of the CR Director are:

- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management
- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communications within VW UK and to VolkerWessels
- Management of the integrated management system, its related systems and applicable memberships, affiliations and registration schemes
- Provision of occupational health services to VW UK and its business units
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VW UK
- Development of systems and protocols, including IT platforms, to support the needs of the business units
- Lead officer for major incidents and provision of legal support services

Integrated Management Systems Managers

Reporting to the CR Director, the Integrated Management Systems (IMS) Managers are responsible for:

- The coordination of activities related to the implementation, development and maintenance of the EMS
- Control, publishing and maintenance of the IMS within the document management system

Commercial / Estimating / Procurement and Design Managers

It is the responsibility of the Commercial, Estimating and Procurement Managers to:

- Ensure subcontractors and suppliers working on behalf of VolkerFitzpatrick are aware of the environmental policy and practice document and provided with the site-specific procedures and environmental management plans
- Ensure the Procurement Policy is communicated to all subcontractors and suppliers
- Check the environmental performance of suppliers and subcontractors for incidents, regulator liaison, fines and court proceedings relating to environmental offences through the use of Constructionline prior to contract award
- Arrange audits of suppliers and subcontractors with the Environmental Manager
- Undertake a HSEQ start-up meeting with the appointed subcontractor or supplier at contract award
- Review Environmental risks and opportunities
- Be familiar with statutory provisions relating to ethical and responsible procurement for specific contracts
- Understand the environmental resourcing and monitoring requirements when tendering a contract

All Employees, Subcontractors and any other Persons Working on our Behalf

It is their responsibility to:

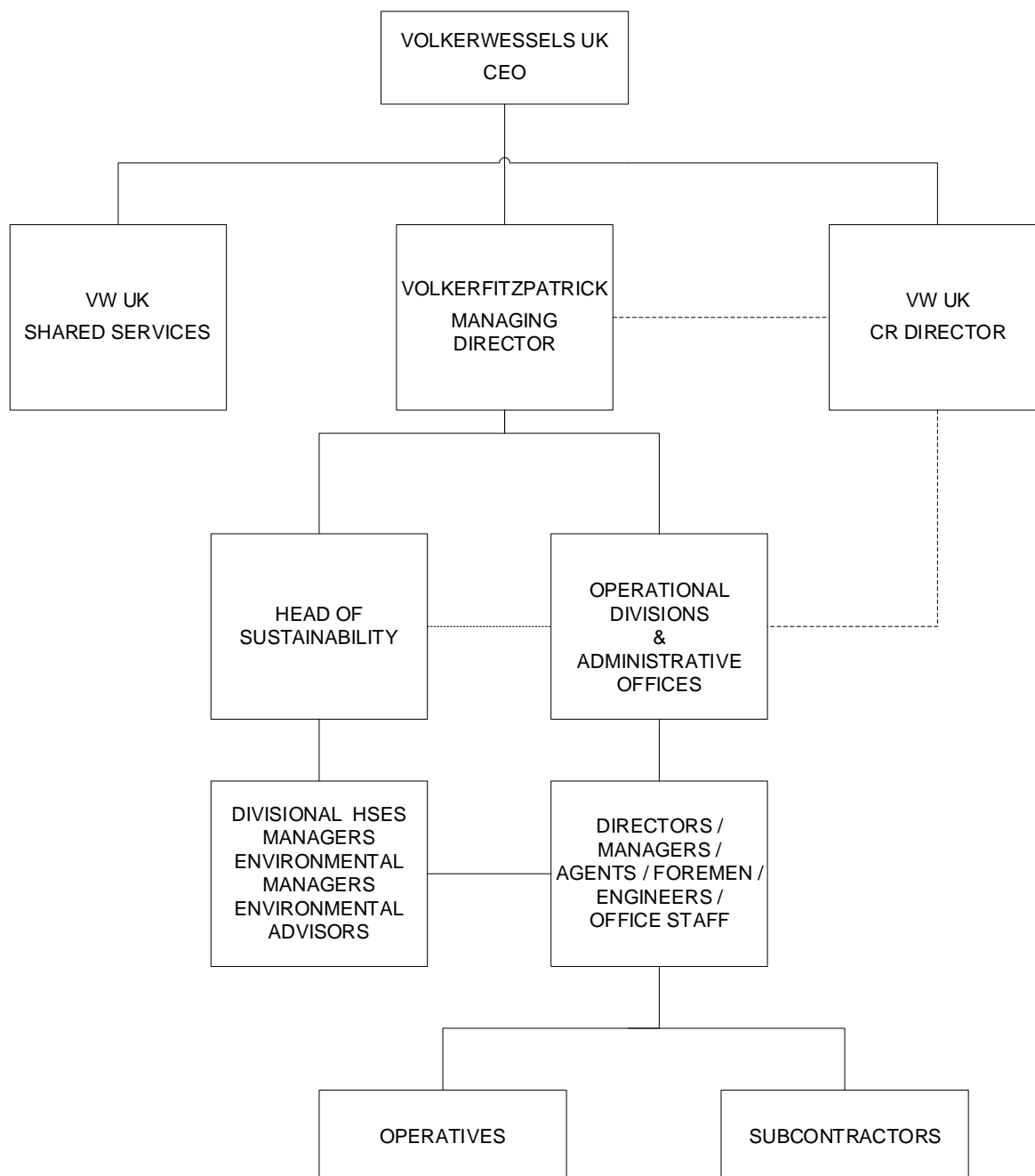
- Be familiar with the Environmental Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Environmental Policy applicable to them and take part in the protection of the environment
- Follow the instructions given regarding the prevention of pollution as part of working methods for particular tasks
- Keep equipment in good order, use the correct equipment for the task and report any defects in plant and equipment or any shortcoming in environmental protection to their manager / supervisor
- Contribute to a responsible culture, be aware of the significant environmental risks, relevant site environmental rules and abide by requirements

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.4 Organisation and Structure

The company is managed by the board of directors, with the structure for environmental management as detailed below:



2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.5 Interested Parties

BS EN ISO 14001:2015 requires the Interested Parties of an organisation to be determined; Interested Parties include people or organisations that can affect, be affected by, or perceive themselves to be affected by a decision or activity of VolkerFitzpatrick / VolkerWessels UK. VolkerFitzpatrick understands the importance of meeting the requirements of its Interested Parties. Interested Parties (including their needs and expectations) that are affected by the VF EMS include:

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> VW UK Employees 	<ul style="list-style-type: none"> Quality of work / life, Job Security, challenge, personal and professional development, career opportunities.
<ul style="list-style-type: none"> Shareholders (e.g. VW NL) 	<ul style="list-style-type: none"> Sustainable growth and profitability.
<ul style="list-style-type: none"> Sub-contractors 	<ul style="list-style-type: none"> Surety of work, paid on time, collaborative working, respectable working environment, desire to work with a responsible organisation.
<ul style="list-style-type: none"> Clients / Customer 	<ul style="list-style-type: none"> High level of service delivery, on time and on budget, in line with client expectations.
<ul style="list-style-type: none"> Suppliers 	<ul style="list-style-type: none"> Information of what is required and when, payment terms are met.
<ul style="list-style-type: none"> Government agencies 	<ul style="list-style-type: none"> Compliance to applicable requirements
<ul style="list-style-type: none"> Regulatory bodies 	<ul style="list-style-type: none"> Compliance to all regulatory and statutory requirements
<ul style="list-style-type: none"> Local community 	<ul style="list-style-type: none"> Considerate construction company when working within local communities.
<ul style="list-style-type: none"> General Public 	<ul style="list-style-type: none"> Minimal disruption to their everyday lives, enhancing the infrastructure and communities.

Q19 *Determining the Context of our Organisation* further explains our Interested Parties.

2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.6 Documented Information

2.6.1 Control of Documented Information

Documented information can be in any format and media and from any source. Documented information can refer to:

- The environmental management system itself, including related processes
- Information created in order for the organisation to operate (documentation)
- Evidence of results achieved (records)

To operate in a consistent manner, and to meet legal, corporate, client and other requirements we maintain an Integrated Management System (IMS) which includes all VW UK policies, procedures, forms, standards, and reference information.

Q01 *Control of Documented Information - Overview* describes the business approach towards control. Q01-01 *Control of the Integrated Management System (IMS)* defines how we establish, create, format, reference, control, and make available the IMS documentation. This document also defines how we control the IMS screens and other storage areas within Workspace including the document library and the project folder structure.

2.6.2 Control of Records

Q01-02 *Control of Records and Workspace on Projects* defines the controls for retaining documented information, including but not limited to construction information, specifications (including drawings) and records (completed forms, plans or emails). It includes guidance on project-based document storage and access to records through Workspace and permissions determined by folder security and individual employee access rights.

Q01-03 *Control of Records and Workspace in Offices and Departments* defines the controls for retaining documented information, including but not limited to shared services departments and regional business unit offices. It includes guidance on document storage and access to records through Workspace.

Q01-04 *Control of Archiving* defines the controls for archiving project and office records.

2.7 Implementation

The Site Management Plan shall assign responsibility to relevant parties to ensure these policy and practice requirements are met. The system is implemented by preparation of Site Management Plans, incorporating specific requirements for the site concerned. These include requirements identified in documents produced by the client or their representative, together with documented company management procedures, which ensure compliance with legislation, regulations and codes of practice relevant to the environment. The VolkerFitzpatrick EMS is summarised on the following page.

Emergency requirements shall be detailed within the Site Management Plan where identified as necessary or specified with contract documents. These shall include details of provisions and procedures for control of incidents, such as oil spillage, to prevent detrimental effects on the environment. Where necessary, these measures may be tested by carrying out an exercise such as a mock environmental spill.

2.8 Risks and Opportunities

One of the fundamentals of environmental management planning is to determine the risks and opportunities to be addressed towards:

1. Giving assurance that the Environmental Management System can achieve its intended outcomes
2. Prevent, reduce, or otherwise mitigate undesired effects
3. Achieve continual performance improvement

The determination of risks and opportunities must include the identification of hazards, the assessment of risk and opportunities, and the meeting of legal and contractual requirements.

Hazard means a source, or a situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these.

Hazard identification is the identification of undesired events that lead to the materialisation of the hazard and the mechanism by which those undesired events could occur. This includes long-term hazards to health (eg high levels of noise or exposure to harmful substances)

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.8 Risks and Opportunities (Continued)

In its most simple terms, risk is a concept involving the possibility of an adverse outcome, and the level of certainty / uncertainty over the occurrence, the timing, or the magnitude of an adverse outcome. If either of these is absent, then there is no risk.

Risk assessment is a systematic process for describing and quantifying the risks associated with hazardous actions, or events, substances, or processes,

Hazard identification and risk assessment is the responsibility of the relevant manager for sites, offices and operational locations with the assistance of the Environmental Manager.

2.9 Environmental Aspects and Associated Impacts

Aspects of our activities which have an impact on the environment shall be identified, and we shall endeavour to mitigate adverse effects.

The use of environmental procedure E01 *Environmental Aspects and Impacts*, is mandatory for all activities undertaken by VolkerFitzpatrick. This procedure shall apply to the operations and activities over which VolkerFitzpatrick has direct control. Also, those supplier, subcontractor and Client impacts, over which VolkerFitzpatrick can exert a significant influence.

A centrally held register, E01-01 *Environmental Aspects and Impacts Register* is maintained. It is reviewed at least annually, to ensure changes within business operation and delivery are considered. Other review may be undertaken to reflect changing legislation or business activity.

E01-02 *Environmental Risk Assessment* is to be used by VolkerFitzpatrick projects, as part of environmental management project planning.

2.10 Work Methods

Operations with environmental effect shall be carried out in accordance with detailed method statements, company procedures and details identified within specific Site Management Plans, together with relevant codes of practice produced by statutory / regulatory bodies.

2.11 Community Relations

We will inform appropriate parties of how and when our operations will affect them, through public meetings, notices and signage or by verbal or written means.

VolkerFitzpatrick is an Associate Member of The Considerate Constructors Scheme (CCS). As such all projects (acting in the Principal Contractor role) over six weeks' duration will be registered with CCS and abide by the CCS code of practice. The CCS code assesses sites over the following categories:

- Care about Appearance
- Respect the Community
- Protect the Environment
- Secure Everyone's Safety
- Value their Workforce

Project performance against these criteria will be evaluated by an independent assessment by the CCS.

2.12 Competency

We take care that the Directors and Departmental Managers allocate responsibilities to those who have the appropriate competence (skills, knowledge and experience) for their role.

The VolkerFitzpatrick Mission Statement is - "Working together to Experience Excellence for our clients and our people." Delivery against the mission statement is supported by key business drivers, the 6Cs, setting out the parameters within which all staff are expected to operate as a business:

- Challenge yourself and others
- Communicate with the team
- Certainty of programme
- Cost awareness
- Campaign against rework
- Care about our people, projects and business

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)**2.12 Competency (Continued)**

All staff have and continue to attend Experience Excellence and 6Cs training and briefing updates.

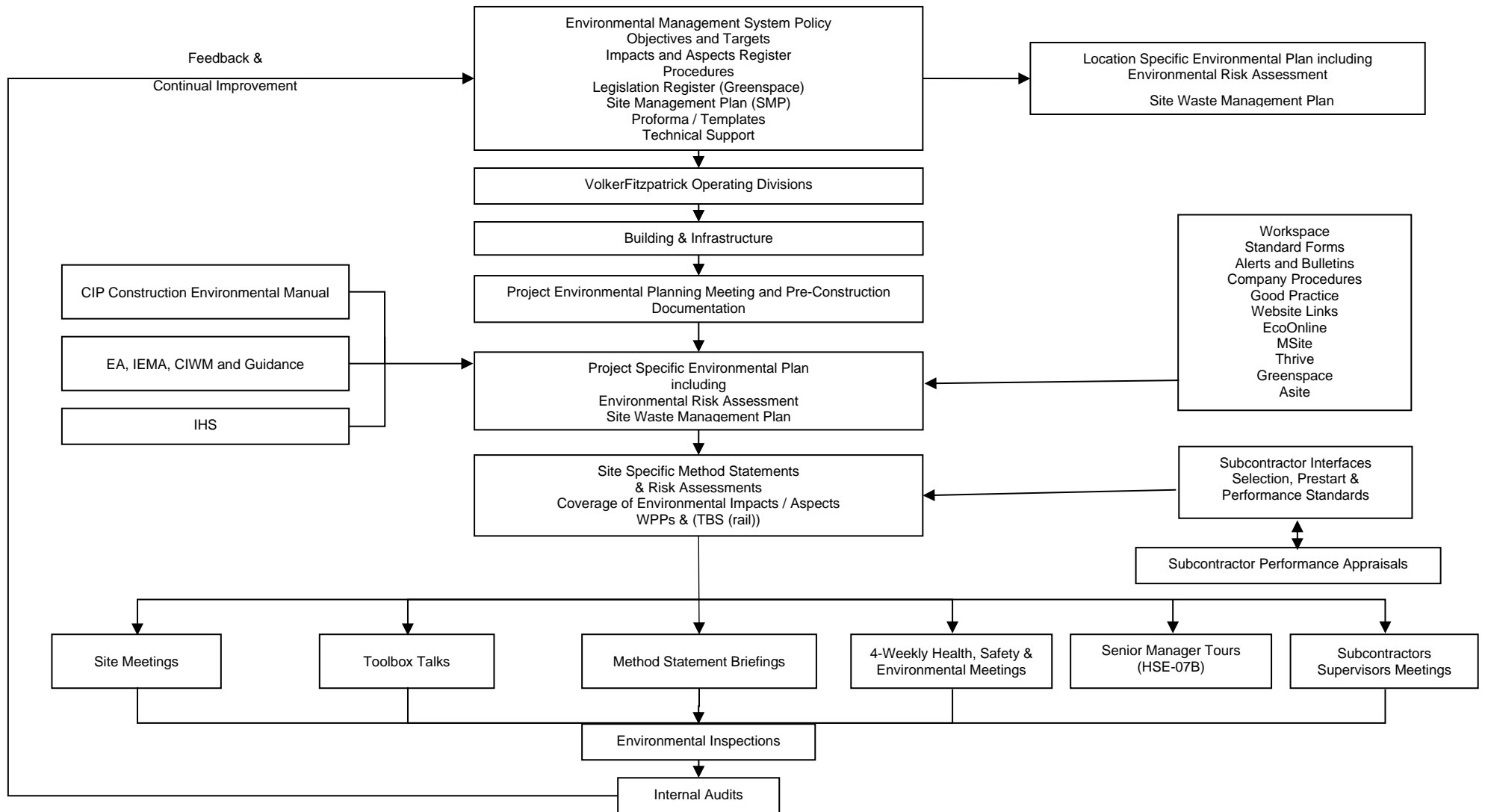
Staff needs assessment of competency is undertaken against a skills matrix. Further, VolkerFitzpatrick is committed to offering training opportunities for all employees, and training needs are identified at annual Personal Development Reviews. Training can be undertaken either through a formal or informal approach, after which it is evaluated and recorded by the relevant team who also retain copies of certificates and cards that have been gained.

Functional roles are outlined in job descriptions where identified as appropriate for the role concerned.

Environmental Awareness Training is delivered to all relevant members of staff, this covers both site-based personnel and persons from relevant support functions. This gives persons a base knowledge on environmental risks, ways of improving environmental performance and shares learning from previous incidents.

Individual training requirements are identified through Personal Development Reviews or requested by individuals responsible for an activity.

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2. ORGANISATION AND ARRANGEMENTS (CONTINUED)

2.13 Environmental Procedures

Company procedures and details, relating to 'Organisation and Arrangements':

- E01 *Environmental Aspects and Impacts*
- E03 *Pollution Prevention*
- E04 *Waste Management*
- H03 *Legislation Compliance*
- H48 *Control of Substances Hazardous to Health*
- H53 *Local Rules for use of Nuclear Density Moisture Gauges*
- Q01 *Control of Documented Information - Overview*
- Q03 *Audit*
- Q04 *Non-conformance and Corrective Action*
- Q07 *Management Review*
- Q08 *Measure and Test Equipment*
- Q18 *Objectives, Targets, Measures and Actions*

3. CHECKING AND CORRECTIVE ACTION

A health, safety and environmental meeting is held at four weekly intervals on each contract, at which environmental issues identified within the Site Management Plan are discussed.

Regular inspections are undertaken during construction to ensure that work is being carried out in an environmentally sensitive manner until the project is completed.

Internal environmental audits are completed 6-8 weeks after project commencement and every six months thereafter to ensure that the company policy and objectives are being complied with.

All monitoring / measure and test equipment shall be of known status in relation to recognised standards, with records of location and findings maintained accordingly.

Any non-conformance or incident regarding an environmental issue shall be recorded, with appropriate corrective and preventive action identified and implemented.

Environmental records will be maintained on Workspace and upon completion of a project, hard copy environmental records shall be retained for the contract-specified period, usually a minimum of 12 months, and shall only be destroyed after checking the legal requirements for retention.

Where a complaint is raised, prompt action will be taken to resolve the situation to avoid further upset.

Company procedures and details relating to 'Checking and Corrective Action':

- Q03 *Audit*
- Q04 *Non-Conformance and Corrective Action*
- Q08 *Measure and Test Equipment*

4. PREVENTIVE MEASURES

4.1 Water Pollution & Works Close to Water Courses

We will take every reasonable precaution to ensure the protection of rivers, streams and other watercourses:

- Environmental permits / Waste Management Licence will be obtained from the suitable regulator where required before discharge into a watercourse takes place and provisions made to ensure such discharge is safe
- Where there is a risk of contamination to a watercourse, control measures shall be identified and where necessary agreed with the suitable regulator

4.2 Noise / Vibration Pollution

VolkerFitzpatrick recognises that noise and vibration are very sensitive issues. For this reason, our operations will be controlled to comply with the Control of Pollution Act 1974.

To help meet this requirement we will assess areas of concern before commencing operations. This will be especially important when operating near sensitive receptors such as hospitals, schools, residential areas and places of work.

We will:

- Based on the programme of works, assess environmental noise / vibration impact
- Adopt Best Practicable Means measures to minimise nuisance
- Consider all alternative construction methods, which offer the minimum noise / vibration levels
- Maintain plant to ensure optimum performance and to eliminate avoidable noise and vibration (including the use of silencers / mufflers where applicable)
- Use noise reduction screens where necessary
- Restrict working hours to avoid particularly sensitive times, such as evenings, wherever possible
- Undertake noise / vibration monitoring to assess our impact on surrounding receptors where a requirement is identified in environmental planning meetings

4.3 Airborne Pollution

The effects of airborne pollution shall be considered by site personnel. Fundamental factors they will need to consider include:

- The ease with which particles contained in dust and smoke can spread, especially in strong or prevailing winds
- The consequent danger to people in the immediate area and further afield

Where operations will create dust, appropriate actions will be taken to keep it to a minimum.

4.4 Visual Pollution

We will do everything we can to behave in an environmentally sensitive way and will look to mitigate visual impacts where possible.

4.5 Waste

In recognition of the fact that the earth's resources are finite, every step possible will be taken to minimise waste through the implementation of the waste hierarchy. Waste should be dealt with as per E04 *Waste Management* (also refer to section 5.0 for further information).

4. PREVENTIVE MEASURES (CONTINUED)

4.6 Energy Consumption

Energy consumption shall be monitored both during our construction activities and at fixed offices, with a view to seeking opportunities for reduction wherever practical. Wherever possible we will select fixed offices and seek to establish site offices, with energy saving measures / technology.

Due to the harmful emissions associated with the use of diesel-powered vehicles, the company encourages the use of cleaner and more energy efficient fuels. Consideration should also be given to the use of alternatively fuelled (i.e. hybrid / electric) vehicles. Vehicles operated by the company shall also be serviced in accordance with the manufacturer's details to maintain efficiency and minimise pollution.

Inductions will include, where practical and relevant, advice on reduction of energy consumption.

The company is committed to the reduction in energy consumption and pollution and will do so where relevant and practical. Our pledge under Pillar 2 of People - Planet - Purpose shows our commitment to energy consumption, as demonstrated in *VolkerServices HSEQS Policy and Practice*. Reduction in energy consumption is important in reducing our overall carbon footprint.

4.7 Carbon Footprint

Our pledge under Pillar 2 of People - Planet - Purpose shows our commitment to lowering our carbon footprint, as demonstrated in *VolkerServices HSEQS Policy and Practice*. Our carbon footprint will be measured on an annual basis. Relevant reports will be issued in accordance with recognised emission reporting protocols and where necessary be validated by a third party. Where possible, and when requested, the company will disclose our carbon footprint data in accordance with standard Carbon Disclosure protocols. Progress towards reducing our carbon footprint will be communicated to all employees and any feedback from the business will be used to further improve our footprint.

4.8 Water Consumption

Water consumption shall be monitored both during our construction activities and at fixed offices, with a view to seeking opportunities for reduction wherever practical. Appropriate water saving measures and devices will be made available where practical to do so. The company is committed to the reduction in water consumption and will do so where relevant and practical.

4.9 Responsible Timber Procurement

The UK government recognises wood certified under the FSC and PEFC schemes as "verified legal and sustainable". In line with these policies, VolkerFitzpatrick will ensure that we and our supply chain only procure timber, timber products and timber sheet materials from FSC or PEFC schemes. Those which cannot demonstrate they are from FSC or PEFC schemes must not be used. Timber from illegal and unsustainable sources must also not be used.

4.10 Biodiversity

We aim to conserve biodiversity on all projects by promoting good practice in relation to wildlife along with the initiative of biodiversity net gain which aims to leave the natural environment in a measurably better state than before. Where we have design responsibilities the mitigation hierarchy will be followed.

4.11 Company Procedures

Company procedures and external Guidelines relating to 'Preventive Measures':

- *E03 Pollution Prevention*
- *E04 Waste Management*
- *E09 Use of Materials on Projects*
- Environment Agency Pollution Prevention Guidelines
- NWR & SEPA Pollution Prevention Guidelines

5. WASTE MANAGEMENT

5.1 Strategy

A Waste Coordinator is appointed on all VolkerFitzpatrick projects and whilst everyone on site will be called upon to do everything they can to minimise waste, it is the Waste Coordinator's responsibility to comply with the waste hierarchy and ensure that the following actions are addressed:

- Reducing waste to landfill
- Eliminate hazardous soils and stones from landfill
- Ensure materials do not become waste under MMPS / use of waste exemptions
- Drive the use of VolkerSwitch

5.2 Waste Disposal Procedures

All waste will be taken to locations authorised to accept the waste in accordance with an appropriate Environmental Permit / Waste Management Licence or Exemption. Hazardous waste and non-hazardous waste will be separated and handled as appropriate. Transport of waste materials to the appropriate location will only be undertaken by a licensed waste carrier.

5.3 Waste Control Documentation

To ensure correct disposal of waste, documented procedures will be implemented and fully complied with, as detailed in company procedure E04 *Waste Management*.

5.4 Non-Hazardous Waste

A Waste Transfer Note will be completed for movements of non-hazardous waste, this will be recorded on the project Site Waste Management Plan along with details of the registered waste carrier and the disposal location. Where regular movements of the same waste are required, a season ticket may be used to replace individual waste transfer notes for each movement.

5.5 Hazardous Waste

All sites or locations in Wales producing more than 500kg annually of hazardous waste will register with NRW as a hazardous waste producer. This registration is not required in either England or Scotland (in Scotland this is referred to as 'Special Waste'). Consignment notes will be completed in accordance with the requirements of the Hazardous Wastes Regulations, as detailed in company procedure E04 *Waste Management*.

The Waste Coordinator on site in charge of waste disposal will obtain the name and address of the disposal location before the consignment leaves. That person will ensure that the location has an appropriate permit / license and if in doubt shall contact the EA / SEPA / NRW. Documentation shall also be obtained from the carrier validating correct disposal.

5.6 Site Waste Management Plans

All sites, regardless of size or value will complete Site Waste Management Plans (SWMPs). The SWMP includes the collection of data relating to waste (including reuse of waste on site), as well as Duty of Care information on waste carriers and final destinations. SWMP data is gathered by HSES / CR Director for reporting on a monthly basis and for annual objectives, benchmarking and for the driving of waste reduction strategies.

5.7 Company Procedures

Company procedures and details relating to 'Waste Management':

- E03 *Pollution Prevention*
- E04 *Waste Management*
- E09 *Use of Materials on Projects*

6. CONTAMINATED LAND

We shall only remove contaminants where instructed to do so. Wherever possible, we shall carry out remediation as an alternative to eliminate or minimise the environmental risk.

6.1 Assessing the Hazard

An assessment will be made prior to appropriate remediation plan being taken. The area(s) of hazardous waste shall be identified on site and cordoned off accordingly.

6.2 Employee / Public Safety

All work will be carried out in accordance with appropriate HSE publications and specific method statements, with dirty / clean areas being established and identified as appropriate.

6.3 Personal Protective Equipment

All visitors and persons working on a contaminated site shall wear suitable protective clothing. Further precautions will depend upon the activities being carried out on site as well as the type of work being undertaken by the person(s) in question.

6.4 Dealing with Contaminated Material

Hazardous waste will be removed and taken to a location authorised to accept the waste under an Environmental Permit / Waste Management Licence, or wherever possible, materials that can remain on site will be isolated by an appropriate encapsulation method or be suitably remediated. Before leaving the site, all vehicles shall be checked to prevent contaminants being spilt or deposited on the public highway. Validation will be carried out to ensure protection of human health and protection of controlled waters is ensured where remediated material is reused on site.

6.5 Bunded Storage Areas

These will be used to avoid the spillage and spread of contaminated materials around the site.

6.6 Storage Tanks for Contaminated Liquids

These will be located on firm foundations above the ground so that they can be regularly inspected for corrosion or leaks. They will be bunded and lined with an appropriate impermeable material, with clear markings to show capacity and contents. Where existing tanks are in place, these shall be used and removed if required upon completion of the works.

7. PROCUREMENT POLICY

7.1 Introduction to The Procurement Policy

The environment and sustainability are key issues within our business. This strategy seeks to balance commercial considerations and quality whilst ensuring that environmental impact is considered.

VolkerFitzpatrick spends a significant sum each year on a wide range of materials. The vast majority of these materials are incorporated into the works that we construct.

Environmental and sustainability issues can be incorporated into the whole procurement process: defining the need, evaluating options, design and specifying, supplier selection, and post-contract management. For this reason, the procurement function is ideally situated to facilitate the development of procurement options that address environmental issues.

The objective is to deliver workable and commercially acceptable environmental solutions specific to each contract and our input and level of resources will directly relate to the potential environmental benefit.

This strategy is intended to facilitate incremental improvements, leading to significant benefits in the long-term.

Wherever possible within the constraints of the individual contracts, we will:

- Assess the environmental impacts of our procurement
- Seek continual improvement of our environmental performance and publicise the results annually
- Work with our suppliers and clients to ensure that, wherever practical, we procure materials to make a more sustainable environment for future generations

Addressing environmental and sustainability issues through the procurement process has the potential to deliver on these commitments in a cost-effective manner. This also provides opportunities to use our influence to ensure that our suppliers and clients also assist us in meeting these commitments.

This strategy demonstrates that we intend to proactively carry out our procurement function whilst equally recognising our responsibilities to the environment.

VW UK is absolutely committed to preventing slavery and human trafficking in its corporate activities. Our statement of compliance with the Modern Slavery Act 2015 sets out actions to understand the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This commitment is also made in our Responsible Procurement Charter.

This strategy is endorsed and supported by the Main Board of Directors and Senior Managers of the company.

7.2 Aims of The Procurement Policy

The strategy is designed to support this Environmental Policy and Practice and in doing so:

- Reduces the consumption of raw materials throughout our business
- Increases the amount of recycled materials that we use
- Increases the percentage of materials that we procure from sustainable sources
- Influences our suppliers in adopting positive approaches to the environment
- Delivers the most appropriate environmental solutions arising from our procurement function
- Develops and promote environmental procurement across the company
- Compliments existing environmental policies and initiatives within the company

7. PROCUREMENT POLICY (CONTINUED)

7.3 Objectives of The Procurement Policy

Training and Awareness

To raise awareness and skills of appropriate staff across the business in how to assess and select the most beneficial environmental procurement options.

Procurement Process

To ensure effective environmental assessments are integrated into everyday procurement functions and to provide all procurement staff with the relevant supporting tools and techniques that can be used without the need for any environmental expertise. Increasing direct spend through preferred suppliers, where environmental performance can be measured, reported and improved through framework agreements.

Communication

Promote awareness of this strategy within the business and to any appropriate external body. Promote achievements and developments relating to environmental procurement within the business.

Research and Collaboration

Continuous research on environmental products, services, initiatives and forthcoming legislation etc. to ensure the procurement process takes account of latest developments. Identify best practice and aim to introduce collaborative approaches with our clients.

Measurement, Reporting and Review

Based upon the information obtained from our own procurement activities and from our "Top" Suppliers, we will provide annual reports to the Managing Director, Purchasing Director, Health & Safety Director and the Head of Sustainability.

Business Ethics

VolkerFitzpatrick will:

- Behave legally, honourably and ethically at all times
- Remain opposed to bribery and the receipt of goods within the context of all aspects of its business
- Trade and compete fairly, within a framework of applicable competition law
- Source a series of company-wide term deal orders to attempt sourcing of goods where possible and practical from local sources
- Attempt to ensure free and open trade within the guidelines of the specification and its ethical conduct. The client generally specifies goods and services, however where value engineering can be undertaken it is encouraged
- Procure fairly traded goods in line with the requirements of its clients and its own procurement guidelines however, we do not typically procure from outside UK

Social Value

VolkerFitzpatrick has an obligation to measure and manage the contribution that we make to society and the communities we work in. We achieve this by using the Thrive Portal (unless there is a client specific requirement to use an alternative system) to report both non-financial AND financial data and rewards that we deliver to the communities in which we work. Social Value is recorded using the Impact Evaluation Standard (IES) that provide proxies and metrics to record and capture social value activities consistently across the business allowing for continuous improvement.

8. IMS AUTHORISATION

Document owner approval:

James McMorrow, Head of Sustainability - 27.01.2022

Approval for IMS:

Sarah Howard, IMS Manager - 28.01.2022

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