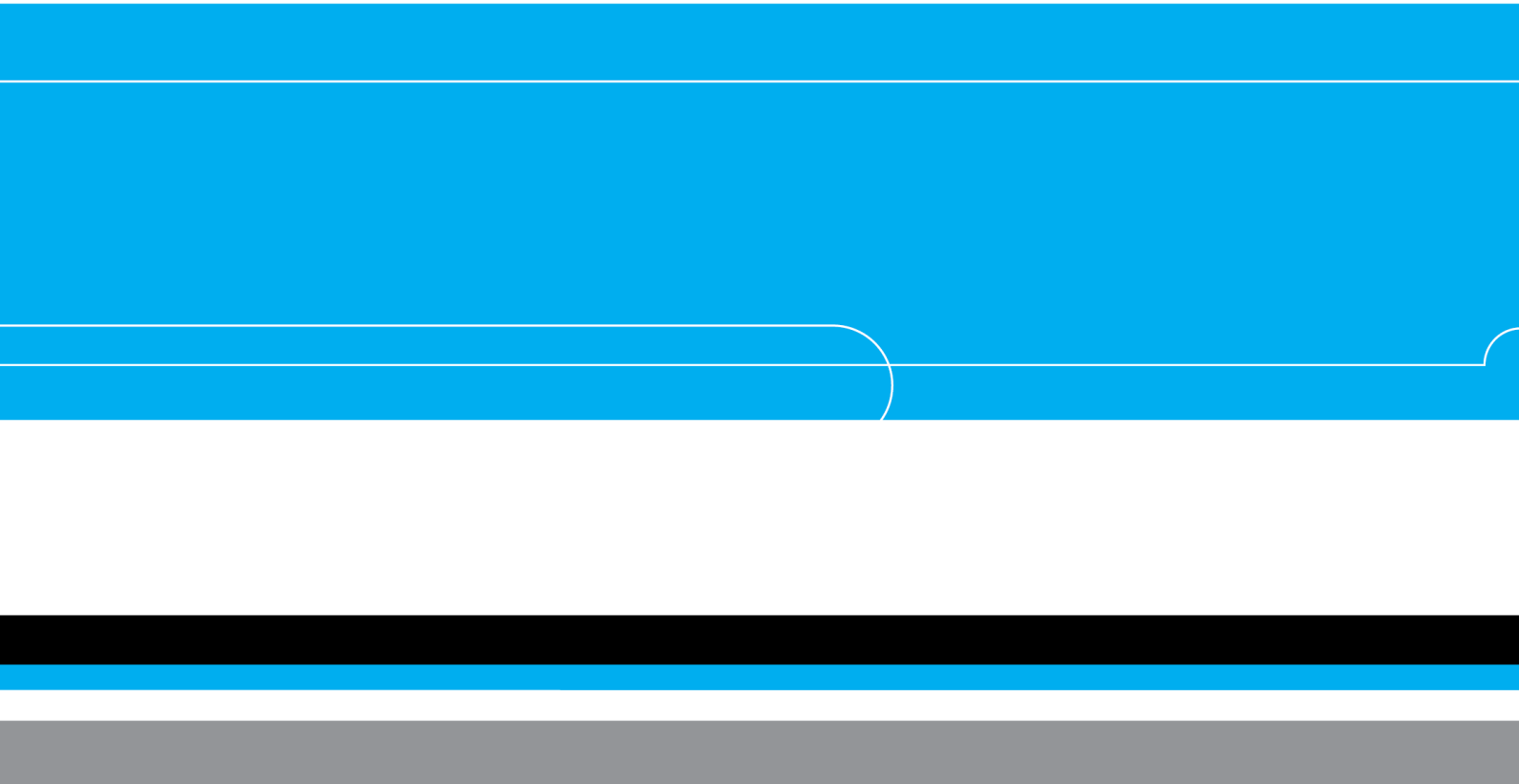


Environmental Policy and Practice

August 2020



ENVIRONMENTAL POLICY STATEMENT

VolkerLaser is a civil engineering contractor operating in the United Kingdom specialising in structural improvements, repairs and refurbishment of car parks, highways and buildings. We are committed to maintaining high standards throughout our operations, with particular regard to minimising the adverse environmental impacts of all company operations, through reduction and control of waste, reusing and recycling materials, prevention of pollution, protection of local environmentally sensitive locations, conserving natural resources and minimising energy consumption.

Specifically, we are committed to:

- Implementing our sustainability strategy
- Ensuring senior management are visible and active in promoting environmental protection
- Enhancing performance based upon behavioural programmes, observations and coaching
- Establishing and maintaining an Environmental Management System (EMS) which meets 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 VolkerLaser subscribes
- Establishing annual environmental objectives and targets according to the nature of our activities, business and other legal requirements, to ensure continuous improvement in both our environmental management systems and our performance
- Establishing additional project / contract specific objectives and targets
- Wherever possible influencing project design by offering solutions to reduce environmental impact
- Considering sustainable and / or recycled products during material selection and procurement for a project wherever we have an influence
- Developing environmental management plans to mitigate adverse environmental impacts such as noise, dust, odour, waste and emergency situations, and taking into consideration local community concerns and the control of hazardous substances
- 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 VolkerLaser and ensuring our Environmental Policy and Practice is accessible to interested parties

All employees and others working for VolkerLaser 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 VolkerLaser 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 VolkerLaser and then brought to the attention of all employees. It is accessible via Workspace or upon request.

Mike Weaver

Managing Director

August 2020

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 2 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

Contents

1	PURPOSE.....	4
2	SCOPE.....	4
3	ABBREVIATIONS & DEFINITION OF TERMS.....	4
4	PRIME CONCERNS.....	5
5	ORGANISATION AND ARRANGEMENT.....	6
5.1	ARRANGEMENTS FOR IMPLEMENTATION.....	6
5.2	RESPONSIBILITY FOR ENVIRONMENTAL MANAGEMENT.....	6
5.3	ORGANISATION AND STRUCTURE.....	10
5.4	IMPLEMENTATION.....	11
5.5	IMPACT ASSESSMENT.....	11
5.6	WORK METHODS.....	11
5.7	COMMUNITY RELATIONS.....	11
5.8	TRAINING.....	11
5.9	ENVIRONMENTAL MANAGEMENT SYSTEM.....	12
5.10	COMPANY PROCEDURES.....	12
6	CHECKING AND CORRECTIVE ACTION.....	13
7	PREVENTIVE MEASURES.....	13
7.1	WATER POLLUTION.....	13
7.2	NOISE POLLUTION.....	13
7.3	AIRBORNE POLLUTION.....	14
7.4	VISUAL POLLUTION.....	14
7.5	WASTE.....	14
7.6	ENERGY CONSUMPTION.....	14
7.7	CARBON FOOTPRINT.....	15
7.8	WATER CONSUMPTION.....	15
7.9	RESPONSIBLE TIMBER PROCUREMENT.....	15
7.10	COMPANY PROCEDURES.....	15
8	WASTE MANAGEMENT.....	15
8.1	STRATEGY.....	15
8.2	WASTE DISPOSAL PROCEDURE.....	15
8.3	WASTE CONTROL DOCUMENTATION.....	16
8.4	SITE WASTE MANAGEMENT PLANS.....	16
8.5	COMPANY PROCEDURES.....	16
9	CONTAMINATED LAND.....	16
9.1	ASSESSING THE HAZARD.....	16
9.2	EMPLOYEE / PUBLIC SAFETY.....	16
9.3	PERSONAL PROTECTIVE EQUIPMENT.....	16
9.4	DEALING WITH CONTAMINATED MATERIAL.....	16
9.5	BUNDED STORAGE AREAS.....	17
9.6	STORAGE TANKS FOR CONTAMINATED LIQUIDS.....	17
10	PROCUREMENT POLICY.....	17
10.1	INTRODUCTION TO THE PROCUREMENT POLICY.....	17
10.2	AIMS OF THE PROCUREMENT POLICY.....	18
10.3	OBJECTIVES OF THE PROCUREMENT POLICY.....	18
11	IMS AUTHORISATION.....	18

1 PURPOSE

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

This document serves as a cross-reference between the requirements of BS EN ISO 14001:2015, and other environmental documentation in use such as the Company Procedures and details contained within respective Site Management Plans.

The construction industry is a major user 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 projects we undertake are part of the built environment and become part of the landscape, making us responsible for their environmental impacts.

VolkerLaser 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.

VolkerLaser 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, 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 VolkerLaser is committed to maintaining high environmental standards throughout the Company's operations. The company 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 Senior HSEQ Manager.

2 SCOPE

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

It is intended to assist every individual and organisation working with VolkerLaser 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
- 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.

3 ABBREVIATIONS & DEFINITION OF TERMS

CR - Corporate Responsibility

MD - Managing Director

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 4 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

4 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.

Visual Pollution

Including site boards, artificial lighting, site cleanliness and general site tidiness.

Sustainability

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

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.

Contaminated Land

Its increasing use for redevelopment 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 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.

5 ORGANISATION AND ARRANGEMENT

5.1 Arrangements for Implementation

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:

- Strong leadership and individual accountability.
- Mitigating the environmental impact of our operations by paying particular attention to the concerns of the local and wider community affected
- Minimising use of the earth's resources through appropriate reuse or recycling procedures, as well as using as materials from renewable sources wherever practical
- Monitoring water and energy consumption
- Select offices, and establish site facilities, which utilise water and energy saving technologies
- Apply best appropriate environmental standards at all of our sites and offices wherever we have an influence
- Encouraging environmental awareness among staff, suppliers and subcontractors, by working with companies whose environmental attitude reflects our own, and increase awareness by appropriate training
- 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
- Obtain prior consent to certain activities being carried out, where it is our responsibility to do so
- Maintain compliance to relevant environmental legislation

5.2 Responsibility for Environmental Management

BS EN ISO 14001:2015 uses the term 'top management' to identify a number of key responsibilities with regard to environmental management. The roles that fall within VolkerLaser's 'top management' for the environment are shown below.

- Managing Director
- Associate Directors
- Senior Health, Safety, Environment, Quality Manager (HSEQ)
- VolkerWessels UK (VW UK) Corporate Responsibility Director (CR)

'Top Management' Responsibilities for the Environment Include:

- Developing the Environmental Policy and objectives for VolkerLaser, 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 Environmental Management System (EMS) is implemented to meet the needs of VolkerLaser, its clients and other interested parties
- Review the EMS periodically
- Identify ways in which to improve the EMS

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 6 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

5 ORGANISATION AND ARRANGEMENT (CONTINUED)**5.2 Responsibility for Environmental Management (Continued)**

- Appoint 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 Environmental Management System (EMS), and are explained as follows:

Managing Director (MD)

The MD (who is also the Board of Directors' representative for environmental management) holds overall responsibility for the operations of VolkerLaser, from developing long-term strategy for the business to overseeing its day-to-day activities. The MD is ultimately responsible for environmental issues, and together with the Senior HSEQ Manager ensures that the company objectives and system are developed, implemented and managed to a beneficial conclusion.

Director

Responsible to the Managing Director for:

- The delivery of all VolkerLaser contracts in a way that minimises harm to the environment.
- 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
- Accept their individual role in providing environmental leadership and engaging active participation of workers in improving environmental performance
- Direct management under their control to implement the environmental policy at all times
- Liaise with the company's appointed environmental management to ensure proper communication exists at all levels
- Ensure adequate planning is undertaken to provide appropriate resources, training and systems of working
- Ensure the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treat the Environmental Management of sites under their control as a matter of the highest importance

EMS Management Representative

The VolkerLaser Senior HSEQ Manager 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 VolkerLaser Operations Director and Managing Director, it is the responsibility of the Senior HSEQ Manager to:

- Ensure the effective use of the CR department and its resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- As a technical specialist is the focal point for internal guidance
- To 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

Environmental Management - HSEQS Team

For the purposes of clarification under ISO 14001, environmental management is not outsourced. A dedicated Senior Health, Safety, Environmental and Quality (HSEQ) Manager is directly employed by VolkerLaser. 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.

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 7 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

5 ORGANISATION AND ARRANGEMENT (CONTINUED)**5.2 Responsibility for Environmental Management (Continued)****Senior Health, Safety, Environment and Quality Manager (HSEQ) and HSEQ Manager / Advisor**

Reporting to the Managing Director the Senior HSEQ Manager is responsible for ensuring effective implementation of the EMS. As a technical specialist provide support, guidance and training.

The responsibilities of the Senior HSEQ Manager and HSEQ Manager include:

- 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 VolkerLaser in communications with the Environment Agency, 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 environmental training requirements
- Ensure that VolkerLaser'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 Institute of Wastes Management (CIWM), and the Institute of Ecology and Environmental Management (IEEM)
- Identify opportunities for improvement

Corporate Responsibility Director (CR)

The 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
- Lead officer for major incidents and provision of legal support services

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 8 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

5 ORGANISATION AND ARRANGEMENT (CONTINUED)

5.2 Responsibility for Environmental Management (Continued)

Integrated Management Systems (IMS) Managers

Reporting to the Corporate Responsibility Director is responsible for:

- The coordination of activities related to the implementation, development and maintenance of the QMS
- Control, publishing and maintenance of the IMS within Workspace (our business management system)

Rail Standards and Compliance Manager

The VolkerFitzpatrick Rail Standards and Compliance Manager fulfils this role and is responsible for:

- Establishing the rail-specific EMS requirements in line with BS EN ISO 14001:2015
- Working in close collaboration with the IMS Manager to ensure legal, sector specific, and other requirements are integrated within the EMS
- Support VolkerLaser in ensuring Rail compliance and through development and review of the company's RISQS (Rail Industry Suppliers Qualification Scheme) manual

Operations Manager / Site Manager / Plant Manager / Site Supervision

It is the responsibility of contract / 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 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 (in line with H07-05 *Actions following Safety or Environmental Incident*) to the appointed Environmental Manager, carry out investigations, make recommendations to prevent recurrence 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

Site Foremen / Yardman / Gangers

It is the responsibility of foremen, yardman 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

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 9 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	--------------

5 ORGANISATION AND ARRANGEMENT (CONTINUED)

5.2 Responsibility for Environmental Management (Continued)

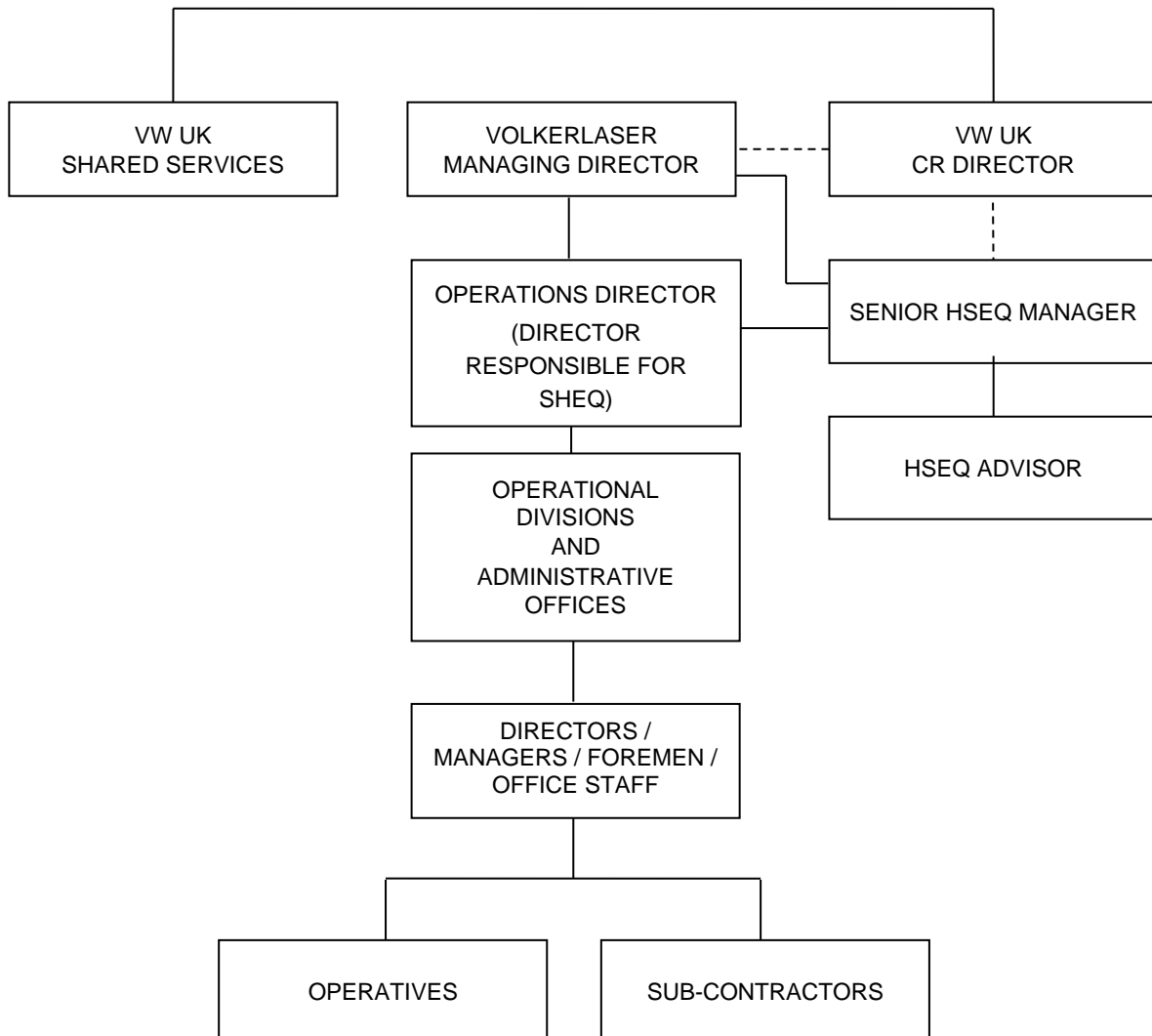
All Employees, Subcontractors and any Other Persons Working on our Behalf

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 relevant site environmental rules and abide by requirements

5.3 Organisation and Structure

The company is managed by the Board of Directors, with the structure for Environmental Management as detailed below:



5 ORGANISATION AND ARRANGEMENT (CONTINUED)

5.4 Implementation

The Site Management team 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 VolkerLaser Environmental Management System 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.

5.5 Impact Assessment

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

5.6 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.

5.7 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.

VW UK are 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:

- Enhancing the Appearance
- Respecting the Community
- Protecting the Environment
- Securing everyone's Safety
- Caring for the Workforce

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

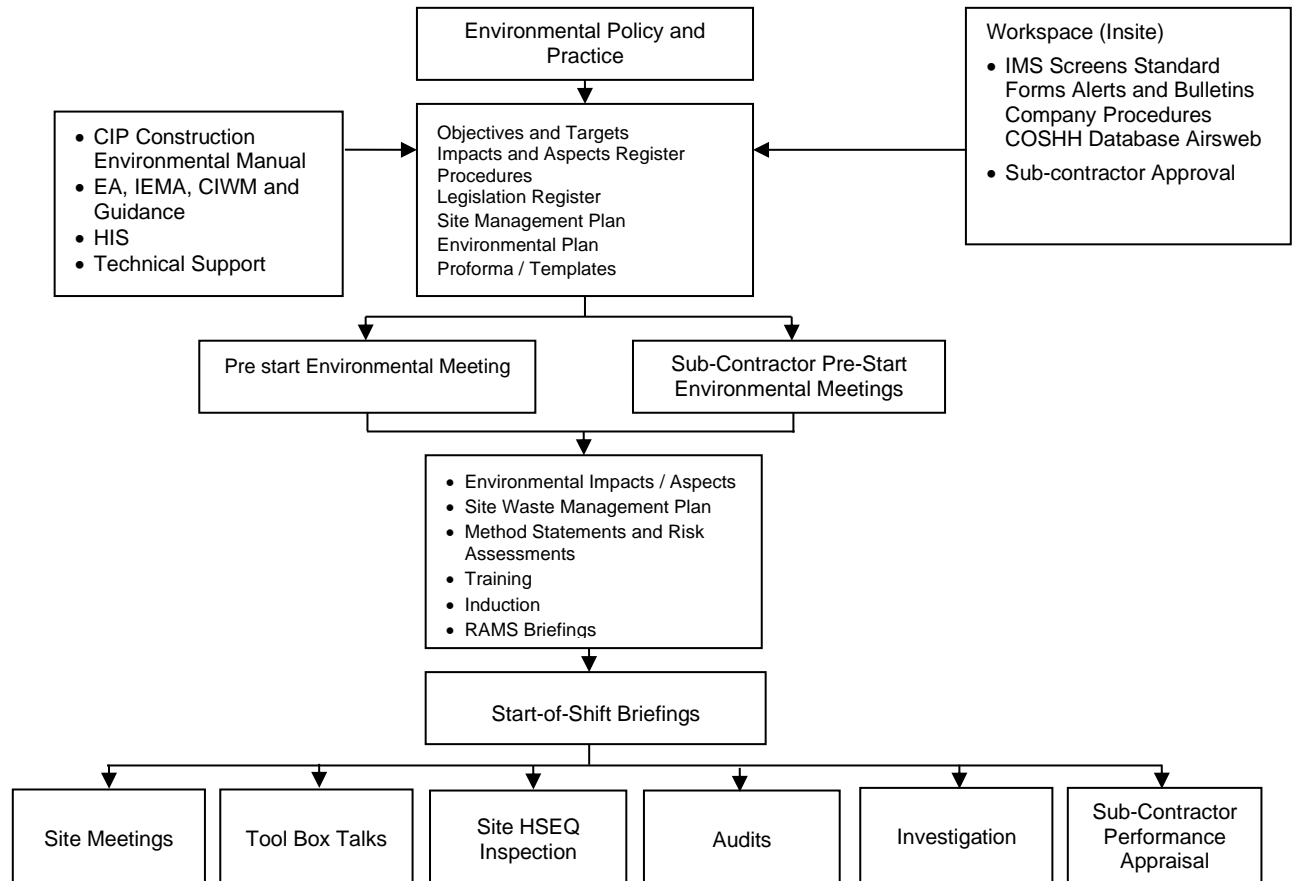
5.8 Training

Training requirements are identified through Development and Performance Reviews or requested either by individuals responsible for an activity or by the HSEQ team

5 ORGANISATION AND ARRANGEMENT (CONTINUED)

5.9 Environmental Management System

The company has an Environmental Management System (SMS) to support the implementation of the policy and is stored on 'Workspace', our business system which provides access to:



5.10 Company 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*
- 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*

6 CHECKING AND CORRECTIVE ACTION

A health, safety and environmental meeting is held at planned intervals on each significant VolkerLaser 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 as per internal audit programme 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.

Upon completion of a site, 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':

- Q04 *Non Conformance and Corrective Action*

7 PREVENTIVE MEASURES

7.1 Water Pollution

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

- Discharge consents will be obtained from the Environment Agency 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 Environment Agency
- Settlement tanks or lagoons shall be used where there is a risk of silt contamination
- Where work is being carried out near a foul tank or trunk sewer, we will give the required notice to the Water Authority prior to commencement of any works
- Cleaning of concrete and mortar batching / delivery plant and equipment shall only be carried out at agreed locations where resulting effluent cannot flow into watercourses and drains and will in accordance with method statements approved by the site management team. Wherever possible we will minimise concrete washing out on site, encourage suppliers to use facilities at the production plant.

7.2 Noise Pollution

VolkerLaser recognises that noise is a very sensitive issue. 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 hospitals, schools, residential areas and places of work.

We will:

- Based on the programme of works, assess environmental noise impact
- Consider all alternative construction methods, which offer the minimum noise levels
- Maintain plant to ensure optimum performance and to eliminate avoidable noise (including the use of silencers / mufflers where applicable)
- Use noise reduction screens where necessary
- Restrict working hours to avoid particularly noise-sensitive times, such as evenings, wherever possible

7 PREVENTATIVE MEASURES (CONTINUED)

7.3 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. Operations to be controlled in this way include:

- Rubbish dumping in skips - sheeting shall be used to prevent the escape of dust, particularly during transportation
- Provision of dust containment screens / tenting subject to task specific assessment.
- Provision of local exhaust ventilation subject to task specific assessment.
- Cutting, grinding or similar operations - to mitigate the effect, a water suppressant or vacuum device will be used
- Earthworks / haulage routes on site - dust will be controlled at source using vehicle speed restrictions and / or damping down procedures. Precautions will be taken to ensure that water used in the damping down process, which may have become contaminated, does not run into a watercourse or surface drainage
- Manage stockpiles to reduce dust, not solely relying on damping down

In certain situations, air monitoring will be undertaken to determine if dust mitigation measures are effective. This will be subject to specific task specific assessment. The use of plant and machinery close to residential dwellings will be closely controlled so that the effects of exhaust emissions are restricted. Similar consideration will be given to the routing of vehicles.

7.4 Visual Pollution

Perception of correct environmental behaviour is often influenced by a variety of visual signals. We will do everything we can to behave in an environmentally sensitive way, but also to be seen to be doing so.

The following actions will therefore be taken in and around our operational sites:

- Site boards and public information signs will be kept clean and will comply with local requirements
- Access routes will be properly marked
- Good site tidiness will be an on-going objective with materials properly stored, rubbish regularly cleared and vehicles sensibly parked
- Artificial lighting will be utilised in such a way that minimises impacts on site neighbours

7.5 Waste

In recognition of the fact that the earth's resources are finite, every step possible will be taken to minimise waste through re-use, recycling or other techniques. Refer to Section 8 for further information.

7.6 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 to do so.

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 14 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	---------------

7 PREVENTATIVE MEASURES (CONTINUED)

7.7 Carbon Footprint

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.

7.8 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.

7.9 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, VolkerLaser 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 not be used.

7.10 Company Procedures

Company procedures and details relating to ‘Preventive Measures’:

- E03 *Pollution Prevention*
- E04 *Waste Management*
- H48 *Control of Substances Hazardous to Health*
- Environment Agency Pollution Prevention Guidelines

8 WASTE MANAGEMENT

8.1 Strategy

Whilst everyone on site will be called upon to do everything they can to minimise waste, it is the appointed waste coordinator’s responsibility to ensure that the following actions are addressed:

- Minimise waste and ensure its correct storage and removal
- Where possible, segregate individual waste types so that materials can be reprocessed for use on site or sold on. Wherever practical the preferred option is for recyclable material to be reused on site or on another suitable project
- Ensure that hazardous wastes are not mixed with general site waste
- Ensure that different hazardous wastes are not mixed
- Under no circumstances allow waste to be burned on site
- Store liquid waste in a suitable manner for eventual removal to a specialist disposal site;
- Take care that stored liquid waste does not permeate into the ground
- Prevent unsupervised or unauthorised discharge of liquid waste to a watercourse, drainage or sewer system. Where discharge is allowable, obtain discharge consent from the appropriate authority, and monitor at all times

8.2 Waste Disposal Procedure

All waste will be taken to locations authorised to accept the waste in accordance with an appropriate Environmental Permit 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.

8 WASTE MANAGEMENT (CONTINUED)

8.3 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*.

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.

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. Consignment notes will be completed in accordance with the requirements of the Hazardous Wastes Regulations, as detailed in company procedure E04 *Waste Management*.

The person 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 and if in doubt shall contact the EA / SEPA / NRW. Documentation shall also be obtained from the carrier validating correct disposal.

8.4 Site Waste Management Plans

E04-01 *Site Waste Management Plan* (SWMP) will be developed for suitable projects as best practice.

The SWMP includes the collection of data relating to waste and non-wastes (e.g. in-situ reuse of clean excavated material), as well as Duty of Care information on waste carriers and final destinations. SWMP data is gathered by HSEQS for annual objectives, benchmarking and for the driving waste reduction strategies.

8.5 Company Procedures

Company procedures and details relating to Waste Management:

- E03 *Pollution Prevention*
- E04 *Waste Management*
- E04-01 *Site Waste Management Plan*

9 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.

9.1 Assessing the Hazard

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

9.2 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.

9.3 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.

9.4 Dealing with Contaminated Material

Hazardous waste will be removed and taken to a location authorised to accept the waste under and Environmental Permit, 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.

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 16 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	---------------

9 CONTAMINATED LAND (CONTINUED)

9.5 Bunded Storage Areas

These will be used to contain materials (chemicals, fuels, oils etc.) and to avoid the spillage and spread of contaminated materials around the site.

9.6 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.

10 PROCUREMENT POLICY

10.1 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.

VolkerLaser 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.

10 PROCUREMENT POLICY (CONTINUED)

10.2 Aims of The Procurement Policy

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

- Reduce the consumption of raw materials throughout our business
- Increase the amount of recycled materials that we use
- Increase the percentage of materials that we procure from sustainable sources
- Influence our suppliers in adopting positive approaches to the environment
- Deliver the most appropriate environmental solutions arising from our procurement function
- Develop and promote environmental procurement across the company
- Complement and work with existing environmental policies and initiatives within the company

10.3 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 most beneficial environmental procurement options.

Procurement Process

To ensure most 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.

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.

Business Ethics

VolkerLaser 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

11 IMS AUTHORISATION

Document owner approval:

Philip Bruce, Senior HSEQ Manager - 25.08.2020

Approval for IMS:

Andria Georgiou, IMS Coordinator - 25.08.2020

Approved for IMS:	IMS Manager	Document owner:	Senior HSEQ Manager	Workspace file:	n/a	Page 18 of 18
-------------------	-------------	-----------------	---------------------	-----------------	-----	---------------