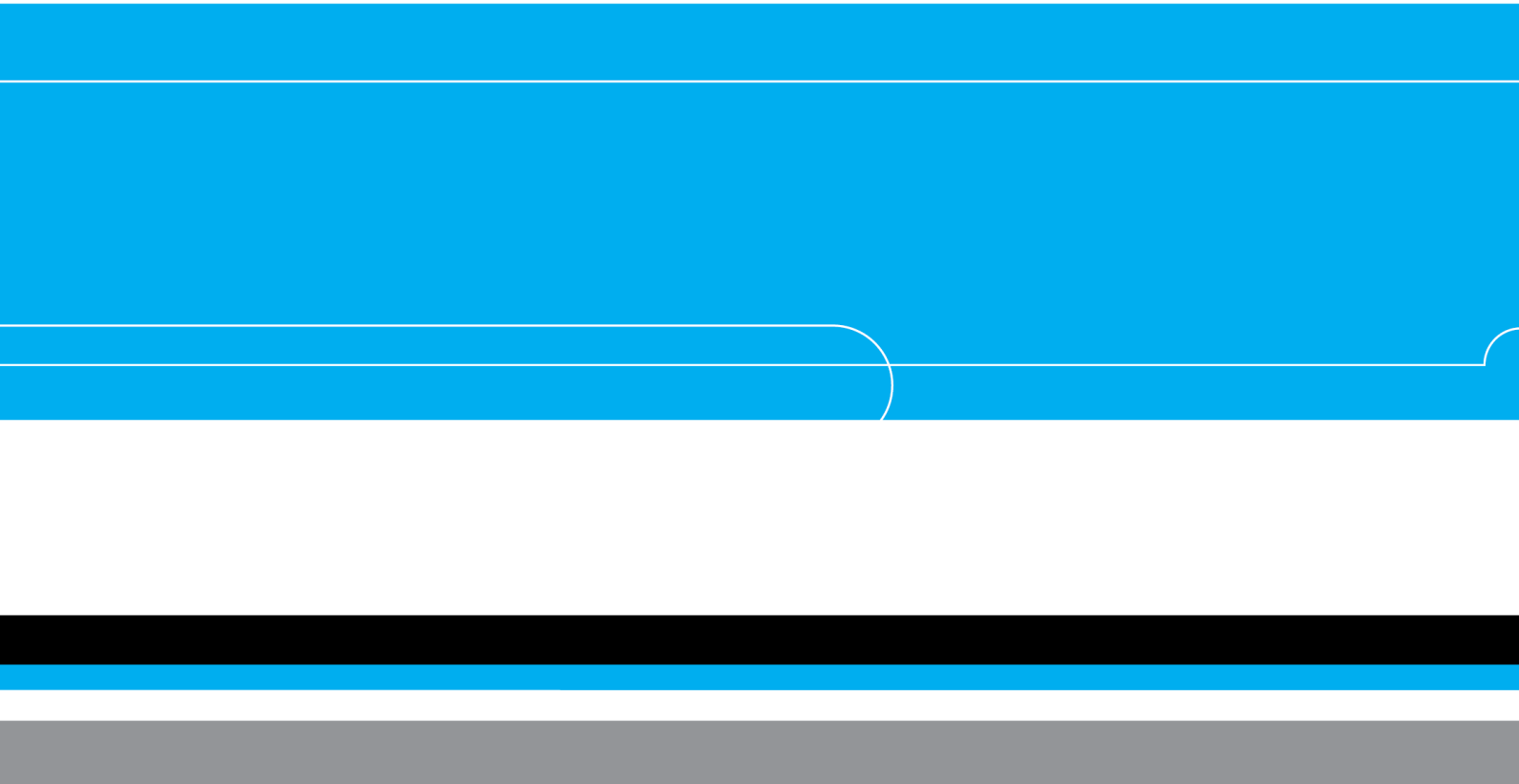


Environmental Policy and Practice

January 2021



ENVIRONMENTAL POLICY STATEMENT

VolkerHighways (including VolkerSmart Technologies) is a multi-disciplinary contractor operating around the United Kingdom. Our services include management of street cleansing, street lighting and electrical services, highways term maintenance, civil engineering and public realm infrastructure projects. Specialist divisions provide surfacing, specialist surfacing and traffic management. We also offer Smart City services such as fibre installation, through VolkerSmart Technologies. We are committed to maintaining high standards throughout our operations, with particular regard to minimising the adverse environmental impacts of all company operations.

VolkerHighways 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 conservation of 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 VolkerHighways 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, energy consumption and our carbon footprint, seeking year on year improvements
- Developing site-specific 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
- 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
- Progressing towards a lower carbon business using lower carbon technologies and methods of working
- Recognising the importance of the circular economy and identifying where we can work towards it
- 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 VolkerHighways
- Continually improve the environmental management system to enhance environmental performance
- Protect the environment by considering climate change and doing what we can through mitigation, adaptation, and protection of biodiversity and ecosystems

All employees and others working for VolkerHighways 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 VolkerHighways' 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 VolkerHighways, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerHighways website, reception areas or is available on request.

Alistair Thompson

Managing Director

January 2021

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Environmental Policy and Practice

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1.0 PURPOSE

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

2.0 SCOPE

This document describes the arrangements in place to put into practical effect the commitment made in the Environmental Policy Statement. It outlines the Integrated Management System (IMS) operated by VolkerHighways. This Environmental Policy is applicable to all VolkerHighways offices and operational facilities.

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

3.0 CONTEXT OF THE ORGANISATION

VolkerHighways is an integrated highways service provider operating across London and the South of England. Our goal is to deliver the best highways solutions within our industry through efficiency, responsibility and a focus on clients and their customers.

Our services include highways term maintenance, street lighting and electrical services, surfacing, traffic management, street cleansing and public realm infrastructure projects. We also offer Smart City services such as fibre installation, through VolkerSmart Technologies.

We help clients to focus on their customers' needs; using highways solutions based on safety, resident and business needs, asset management and asset improvement.

We bring industry best practice and innovation to our clients by taking a leading role in the civil engineering industry and sharing in the expertise of our wider VolkerWessels UK group.

As part of one of the largest construction groups in Europe, VolkerWessels, we have access to the technical resources and innovations of companies working throughout the world. This includes our sister companies in the UK with whom we form VolkerWessels UK (VW UK). Together we share best practice and skills, harness talent, improve delivery to clients and support the continued growth of the group in the UK.

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 road, building, rail and infrastructure projects we construct become part of the landscape, making us responsible for their environmental impacts.

VolkerHighways 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.

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3.0 CONTEXT OF THE ORGANISATION (CONTINUED)

VolkerHighways 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 Senior Management of VolkerHighways 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 Senior HSEQS Manager.

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

VolkerHighways registered office is Hertford Road, Hoddesdon, Hertfordshire EN11 9BX.

3.1 INTERESTED PARTIES

BS EN ISO 14001:2015 requires the Interested Parties relevant to 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 VolkerHighways / VolkerWessels UK. VolkerHighways understands the importance of meeting the requirements of its Interested Parties. Interested Parties (including their needs and expectations) that are affected by the VH EMS include:

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> VH Employees & other VW UK business unit employees 	<ul style="list-style-type: none"> Quality of work / life, Job Security, challenge, personal and professional development, career opportunities. Expectation to work for a sustainable organisation.
<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"> Collaborative working, respectable working environment, desire to work with a responsible organisation. Environmental support when appropriate.
<ul style="list-style-type: none"> Clients 	<ul style="list-style-type: none"> High level of service delivery, on time and on budget, in line with client expectations. Achievement of sustainability objectives / targets.
<ul style="list-style-type: none"> Suppliers 	<ul style="list-style-type: none"> Information of what is required and when. Working relationships that mutually improves the involved organisations sustainability.
<ul style="list-style-type: none"> Competitors (Joint Ventures) 	<ul style="list-style-type: none"> Accountability and appropriate communication / support involving environmental issues.
<ul style="list-style-type: none"> Industry bodies 	<ul style="list-style-type: none"> Knowledge sharing, source and share best practice, influence positive changes in the industry.

3.0 CONTEXT OF THE ORGANISATION (CONTINUED)

3.1 INTERESTED PARTIES (CONTINUED)

The below interested parties may affect VH EMS but may not be affected by VH QMS directly.

Interested Parties	Needs and Expectations
<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 (EA etc) 	<ul style="list-style-type: none"> Compliance to all regulatory and statutory requirements.
<ul style="list-style-type: none"> Utility service providers and sewerage undertakers 	<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, social responsibility. Delivery of added social value.
<ul style="list-style-type: none"> General Public 	<ul style="list-style-type: none"> Minimal disruption to their everyday lives and wellbeing, enhancing the infrastructure and communities. Responsible development.

4.0 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 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

4.0 PRIME CONCERNS (CONTINUED)

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 common place to the critically endangered. We aim to conserve biodiversity on all projects by promoting good practice in relation to wildlife.

5.0 ORGANISATION AND ARRANGEMENTS

5.1 ARRANGEMENTS FOR IMPLEMENTATION OF 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 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 establish 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
- Encouraging environmental awareness among staff, suppliers and subcontractors, by working with companies whose environmental attitude reflects our own, and increasing 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
- Obtaining prior consent to certain activities being carried out, where it is our responsibility to do so
- Maintaining compliance to relevant environmental legislation

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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

5.2 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 VolkerHighways' 'top management' for the environment are shown below:

- Managing Director
- Operations Director(s)
- Commercial Director
- Framework Director
- Surfacing and Traffic Management Business Manager
- Senior HSEQS Manager
- VolkerWessels UK Corporate Responsibility Director

Top Management

Within VolkerHighways top management demonstrate leadership and commitment to the IMS by taking on responsibilities for environment that include:

- Developing the Environmental Policy and objectives for VolkerHighways, 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 VolkerHighways, 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

- Board of Directors' representative for environmental management
- Ultimately responsible for the company's IMS
- Has overall responsibility for the operations of VolkerHighways
- Develops long-term strategy for the business
- Ultimately responsible for environmental issues, and together with the Corporate Responsibility Director ensures that the company objectives and system are developed, implemented and managed to a beneficial conclusion.
- Sets realistic goals for the continual improvement of environmental management

Environmental Management - HSEQS Team

- For the purposes of clarification under ISO 14001, environmental management is not outsourced. A dedicated Environmental Manager is directly employed by VolkerHighways.
- In addition to this, VW UK Corporate Responsibility provides strategic direction, performance management, occupation health, IMS management, technical services and compliance support to all of the VW UK companies.

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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

5.2 RESPONSIBILITY FOR ENVIRONMENTAL MANAGEMENT (CONTINUED)

Operations Director(s) / Commercial Director / Framework Director / Surfacing and Traffic Management Business Manager

Reporting to the Managing Director and responsible for:

- The safe delivery of all VolkerHighways' 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
- Liaising with the company's appointed environmental management representative 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

EMS Management Representative - Senior HSEQS Manager

The Senior HSEQS 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 MD, it is the responsibility of the Senior HSEQS Manager to:

- Ensure the effective use of the HSEQS 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 MD 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
- Play a key part in improving the environmental performance of our activities
- Represent VolkerHighways in communications with any environmental regulatory or 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 VolkerHighways 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

The Senior HSEQS Manager reports to the MD, line manager for the Environmental Manager is also responsible for effective allocation of environmental support.

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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**5.2 RESPONSIBILITY FOR ENVIRONMENTAL MANAGEMENT (CONTINUED)****Environmental Manager**

Reporting to the Senior HSEQS Manager, the Environmental Manager is part of an HSEQS team responsible for ensuring effective implementation of the EMS. As a technical specialist they provide support, guidance and training.

The responsibilities of the Environmental Manager 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 VolkerHighways 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 of appropriate environmental training requirements
- Ensure that VolkerHighways' 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

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

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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

5.2 RESPONSIBILITY FOR ENVIRONMENTAL MANAGEMENT (CONTINUED)

Integrated Management Systems Managers

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

- Establish the EMS requirements in line with BS EN ISO 14001:2015
- Work with the Corporate Responsibility Director and HSEQS
- The coordination of activities related to the implementation, development and maintenance of the EMS
- Control, publishing and maintenance of the IMS within Workspace (our Business Management System)

VolkerWessels UK Corporate Responsibility Team (reporting to CR Director)

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

Contracts Management / Operations Management / 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 co-operation 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 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
- Report all environmental incidents 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

5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**5.2 RESPONSIBILITY FOR ENVIRONMENTAL MANAGEMENT (CONTINUED)****Site Foremen / Gangers / Supervisors**

It is the responsibility of Supervisors, 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
- Co-operate and liaise where appropriate with other contractors' site supervision

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

It is their responsibility to:

- Be familiar with the Environmental Policy and co-operate 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

Commercial / Estimating / Procurement Managers

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

- Ensure subcontractors and suppliers working on behalf of VolkerHighways are aware of the environmental policy and practice document and are provided with 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 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
- 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

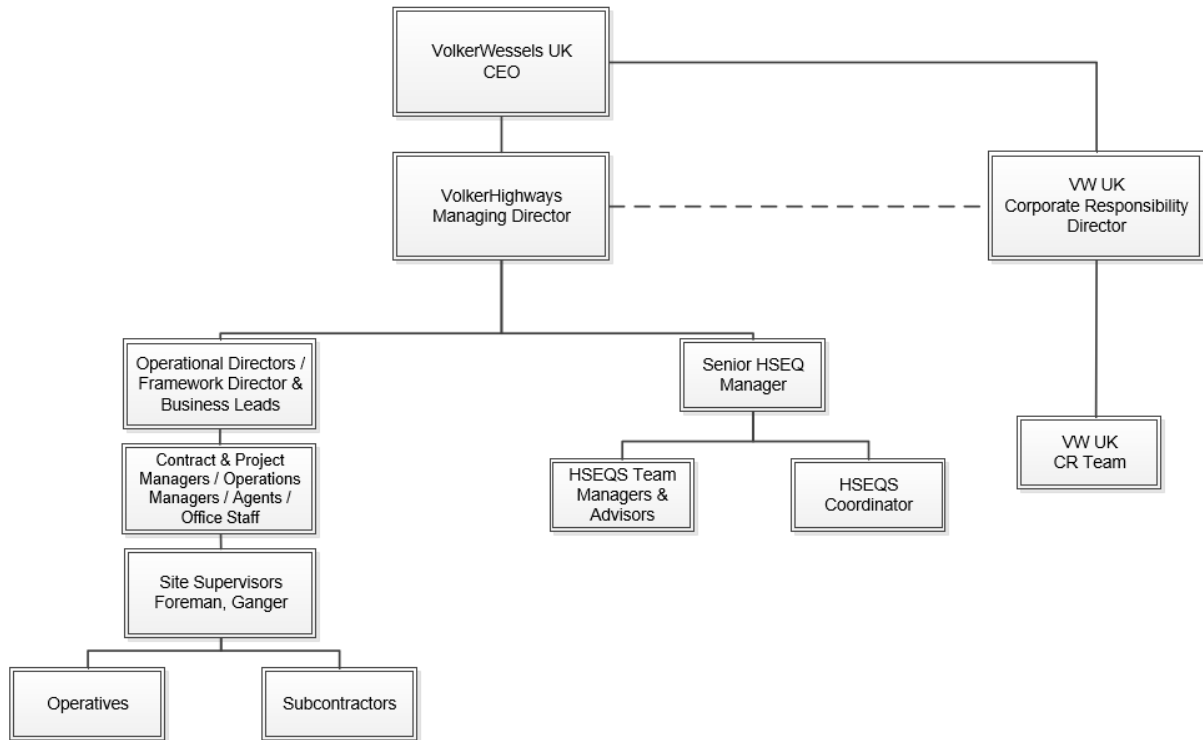
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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

5.3 ORGANISATION AND STRUCTURE

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



5.4 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 VolkerHighways 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.

5.5 RISKS & 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.

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5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**5.5 RISKS & OPPORTUNITIES (CONTINUED)**

Hazard identification is the identification of undesired events that lead to the materialisation of the hazard and the mechanism by which those desired events could occur. This includes noise nuisance from construction sites caused by noise pollution.

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.

5.6 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.

5.7 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.

5.8 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.

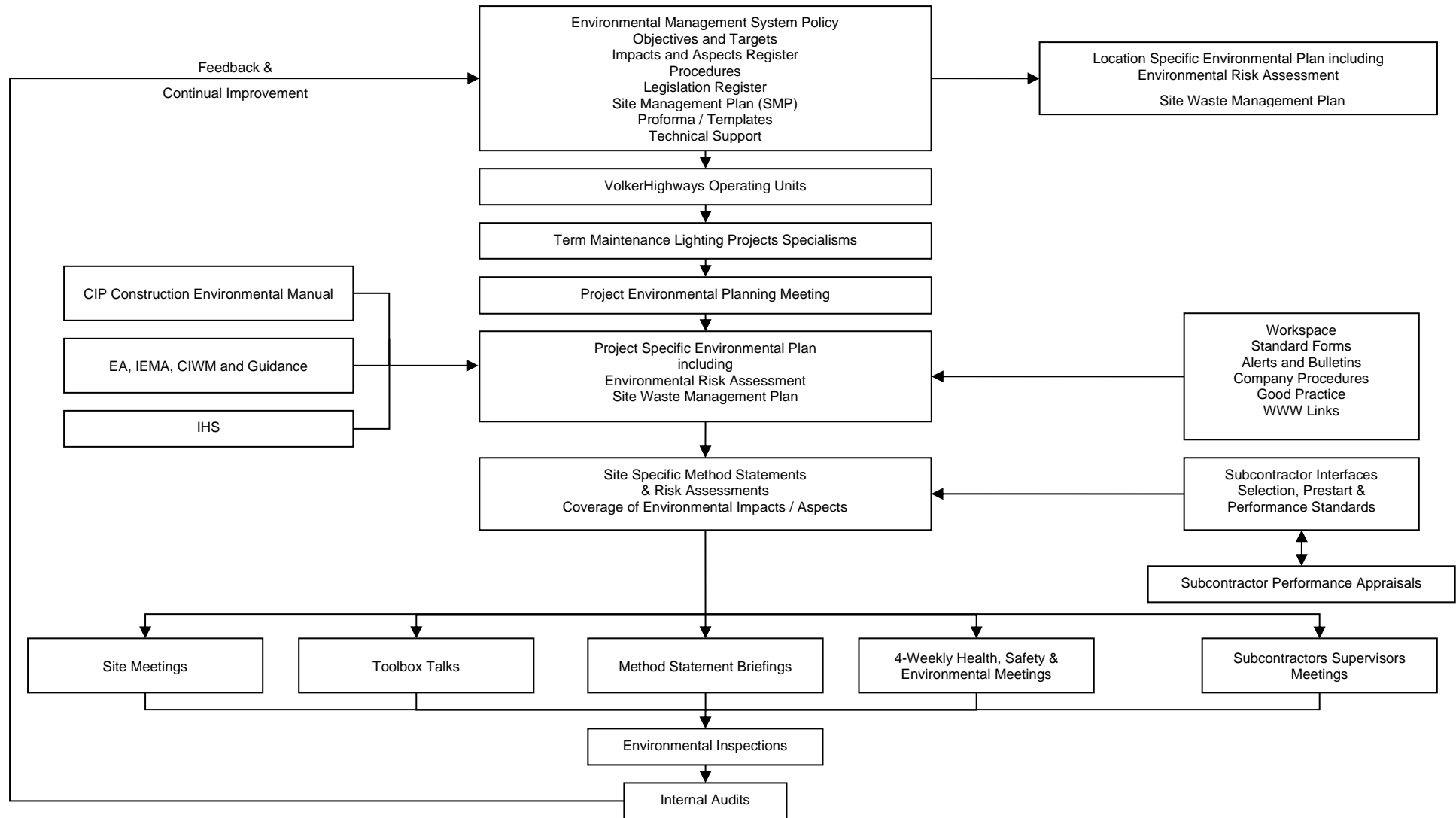
VolkerHighways registers sites with the Considerate Constructors Scheme (CCS). As such all projects (acting in the Principal Contractor role) over six weeks duration will be registered with CCS and abide by the CCS code of practice. The CCS code assesses sites over the following categories:

- 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.

5.9 TRAINING

Training requirements are identified through Development Performance Reviews or requested by individuals responsible for a particular activity. Identified training will be provided to all levels of the VolkerHighways managerial and operational team. The training requirements will be assessed at commencement of employment for new employees, and on an ongoing basis for existing employees. The capabilities and expertise of our management and supervisory employees is assessed at safety management meetings and at the annual Development Performance Reviews.



5.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

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*

6.0 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. Further internal environmental audits should be considered every six-months but the frequency must be confirmed using a risk-based approach every six months 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 project, 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*

7.0 PREVENTIVE MEASURES

7.1 WATER POLLUTION

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

- Environmental Permits 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. Wherever possible we will minimise concrete washing out on site and encourage suppliers to use facilities at the production plant

7.2 NOISE POLLUTION

VolkerHighways 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

7.3 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
- 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

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.

7.0 PREVENTATIVE MEASURES (CONTINUED)**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 below actions will therefore be followed on 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 ongoing 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 reduction, re-use, recycling or other techniques (refer to section 5.0 for further information).

7.6 ENERGY CONSUMPTION

Energy consumption shall be monitored both during our construction activities and at fixed offices / depots where procured by VolkerHighways, 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.

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 where water is procured by VolkerHighways, 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, VolkerHighways 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*
- E09 *Use of Materials on Projects*
- Environment Agency Pollution Prevention Guidelines

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8.0 WASTE MANAGEMENT

8.1 STRATEGY

A Waste Co-ordinator is appointed on all VolkerHighways projects and whilst everyone on site will be called upon to do everything they can to minimise waste, it is the Waste Co-ordinator'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 PROCEDURES

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.

8.3 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*. It is the duty of the nominated responsible person on-site in charge of waste disposal to carry out thorough duty-of-care checks to ensure that all waste is disposed of legally and responsibly. The nominated responsible person shall inform the appropriate regulator if it is suspected that waste is being moved illegally or irresponsibly. Thorough documented waste disposal evidence shall be maintained by the nominated responsible person.

Non-Hazardous Waste

Waste transfer notes will be completed in accordance with all relevant legislation.

Hazardous Waste

Sites in England, Scotland and Northern Ireland producing hazardous waste do not need to be registered with the Environment Agency (EA), Scottish Environmental Protection Agency (SEPA) or the Northern Ireland Environment Agency (NIEA) respectively as producers of hazardous waste.

Sites in Wales which plan to produce hazardous waste equal to, or in excess of, 500kg in any 12 month period however do need to be registered with Natural Resources Wales (NRW) as producers of hazardous waste.

In all cases all hazardous waste movements shall be covered by complete and accurate consignment notes prepared and distributed in accordance with all relevant legislation.

8.4 SITE WASTE MANAGEMENT PLANS

All sites, regardless of size or value will complete Site Waste Management Plans (SWMP). 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 of waste reduction strategies.

8.5 COMPANY PROCEDURES

Company procedures and details relating to 'Waste Management':

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

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9.0 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 an 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.

9.5 BUNDED STORAGE AREAS

These will be used 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 banded 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.

10.0 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.

VolkerHighways 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.

10.2 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
- Compliments existing environmental policies and initiatives within the company

10.0 PROCUREMENT POLICY (CONTINUED)**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.

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 and Senior HSEQS Manager.

Business Ethics

VolkerHighways 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

VolkerHighways has an obligation to measure and manage its contribution that we make to society and the communities we work in. This is measured according to the principles laid out within the Public Services (Social Value) Act 2012. We achieve this by using Thrive to report both non-financial AND financial data and rewards that we deliver to the communities that we work. This is reported on a 6 monthly basis and is based on the National TOMs (Themes - Outcomes - Measures) Framework. The aim of the National TOMs Framework is to provide a minimum reporting standard for measuring social value for organisations in a consistent manner allowing for continuous improvement.

Company Procedures

Company procedures and details relating to ‘Procurement’:

- *E07 Mobile Crushing Site Guide*
- *E09 Use of Materials on Projects*

11.0 IMS AUTHORISATION**Document owner approval:****Jason Convey**, Senior HSEQS Manager - 29.01.2021**Approval for IMS:****Sarah Howard**, Senior IMS Manager - 29.01.2021