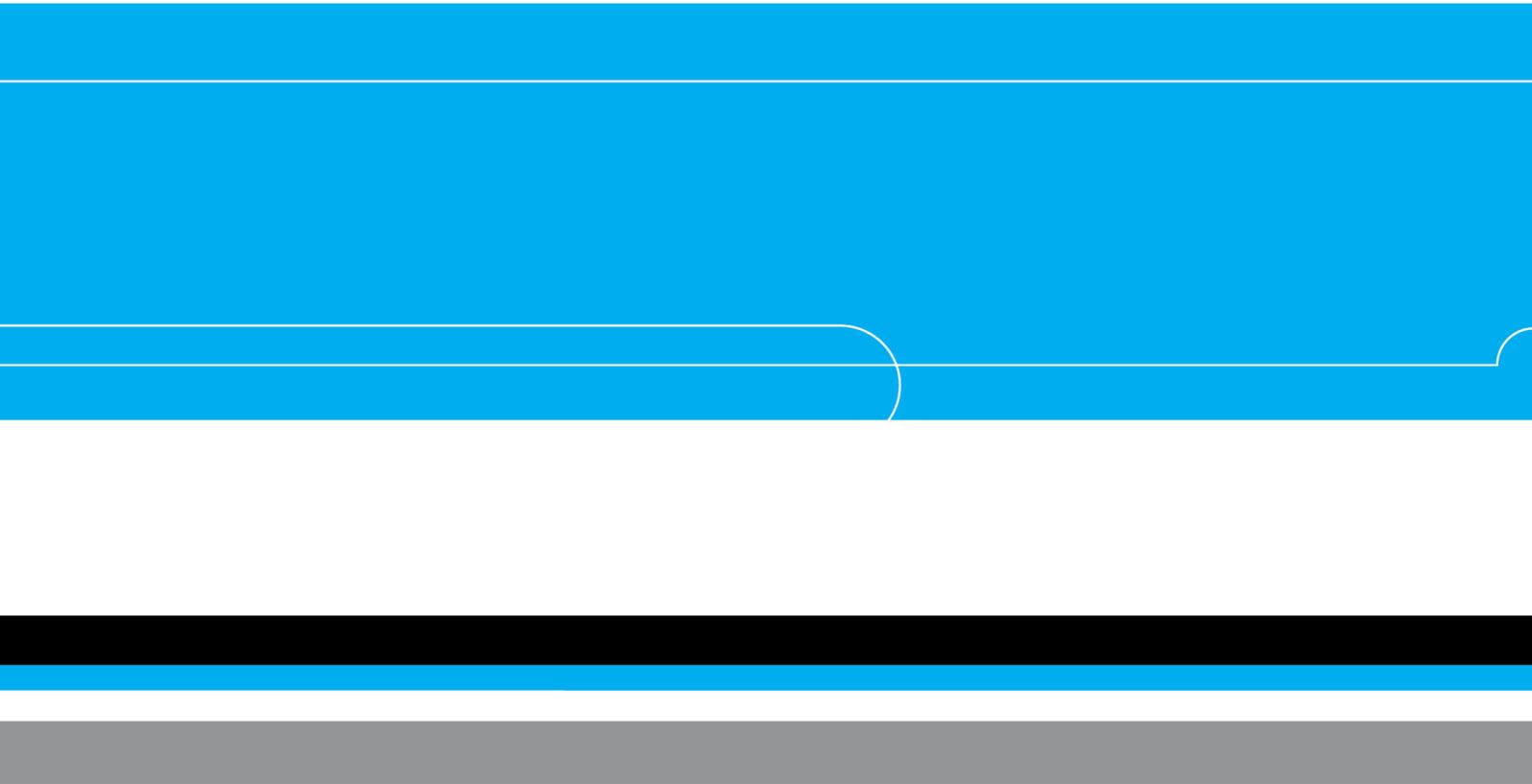


Environmental Policy and Practice

January 2018



ENVIRONMENTAL POLICY STATEMENT

VolkerStevin is a major construction and engineering company operating in the United Kingdom providing complex engineering solutions across a wide range of sectors including; civil engineering land remediation and regeneration, water and marine infrastructure and flood and coastal protection.

We operate under a fully established Integrated Management System (IMS) to BS EN ISO 14001:2015 which provides clear guidelines on how we manage environmental impacts throughout VolkerStevin.

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

Specifically we are committed to:

- Maintaining and implementing an Integrated Management System compliant with the requirements of BS EN ISO 14001:2015 and implementing this IMS throughout our project activities and fixed office locations
- Maintaining certification against recognised Chain of Custody schemes for the purchase and use of responsibly sourced timber
- Complying with relevant environmental legislation, corporate and other requirements to which VolkerStevin 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. These include sustainable procurement and the reduction of resources such as waste, water, energy consumption and carbon. We will review our objectives and targets annually
- Developing site-specific Environmental Management Plans as part of our Site Management Plan (SMP) 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
- Introducing methods of reduction, reuse and opting for recycled or sustainably procured products across our supply chain
- Minimising the adverse impacts of our operations on local communities, wherever we have an influence
- Protect the environment by considering climate change and doing what we can through mitigation, adaptation, and protection of biodiversity and ecosystems
- Working with our clients, suppliers, subcontractors, our own employees and all other stakeholders to improve all parties' environmental performance
- Providing appropriate environmental information and guidance to employees and others working on behalf of VolkerStevin, as well as lead in the creation and adoption of best practices

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

Rob Coupe
Managing Director
January 2018

Environmental Policy and Practice

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1 CONTEXT OF ORGANISATION

VolkerStevin is a multi-disciplinary contractor with a reputation for innovative engineering in the civil engineering, land remediation and regeneration, water and marine infrastructure and flood and coastal protection sectors. Our customer focussed culture empowers our experienced employees to find project solutions which exceed the expectations of all stakeholders.

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

We fully support the aims and objectives of environmental statutory provisions and will cooperate fully with the requirements of the relevant environmental regulatory and enforcing bodies.

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 Head of HSEQS.

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

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

VolkerStevin's registered office is Hertford Road, Hoddesdon, Hertfordshire EN11 9BX.

2 PURPOSE

The purpose of this document is to outline the Environmental Management System (EMS) operated by VolkerStevin, 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 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 VolkerStevin. This Environmental Policy is applicable to all VolkerStevin offices and operational facilities.

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3 SCOPE

This document applies to all activities undertaken by the business in our offices and on our sites, comprising the management of design and construction for civil engineering and building works, steel fabrication, vehicle maintenance, plant maintenance and formwork.

This policy will assist each individual and organisation working with VolkerStevin in understanding the environmental considerations that may influence them in:

- Sound working practices, especially in preventing pollution and ensuring proper waste management
- Operating procedures designed to encourage waste minimisation and the 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, such as oils, glues, paints, preservatives, concrete and other materials which may contain pollutants
- Selection of recycled and recyclable materials and 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.

4 IMS STRUCTURE

The Integrated Management System (IMS) is a structured framework used to establish VolkerStevin’s structure, roles and responsibilities, planning, operation, policies, practice, rules, objectives and processes to ensure our overall objectives, as set out in our Environmental Policy, are implemented and achieved throughout the organisation. Where referenced within this document IMS relates to environmental management.

The IMS includes a number of environmental processes and procedures that are fundamental to the requirements of our business. The IMS is structured in the following format:



5 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

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.

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.

Environmental Policy and Practice

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6 ORGANISATION AND ARRANGEMENT

Arrangements for implementation of Policy

These requirements and our management controls including emergency requirements are detailed within a specific Site Management Plan (SMP) prepared for each project and our fixed operational locations. The SMP shall assign responsibility to relevant parties to ensure these policy and practice requirements are met. 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 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 where possible
- Selecting offices, and establishing site facilities, which utilise water and energy saving technologies wherever feasible
- 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 legislative and other requirements

Impact Assessment

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

Work Methods

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

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6 ORGANISATION AND ARRANGEMENT (CONTINUED)**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.

VolkerStevin is an Associate member of The Considerate Constructors Scheme (CCS). As such all projects (acting in the Principal Contractor role) over six weeks duration will be registered with CCS and abide by the CCS code of considerate practice.

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

Training

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

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 VolkerStevin's 'top management' for the environment are shown below.

- Managing Director
- Regional / Contracts Directors
- Commercial Director
- Business Improvement Manager
- Head of Health, Safety, Environment, Quality and Sustainability (HSEQS)
- Environmental Advisor
- VolkerWessels UK Corporate Responsibility Director (CR)

Top Management

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

- Developing the Environmental Policy and objectives for VolkerStevin, 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 IMS is implemented to meet the needs of VolkerStevin, its clients and other interested parties
- Reviewing the IMS and identifying ways in which to improve it

Managing Director (MD)

- Board of Directors' representative for environmental management
- Ultimately responsible for the company's IMS
- Has overall responsibility for the operations of VolkerStevin
- 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

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6 ORGANISATION AND ARRANGEMENT (CONTINUED)**Project / Contracts / Business Directors (accountable to MD)**

It is the responsibility of these Directors to:

- Ensure the safe delivery of all VolkerStevin contracts
- Oversee and support the effective implementation of the EMS and liaise with clients to ensure their satisfaction
- Train, support and mentor their direct staff to develop their knowledge / application of the EMS
- Accept their individual role in providing environmental leadership and engage active participation of workers in improving environmental performance
- Ensure direct management under their control implement the Environmental Policy at all times
- Cooperate with the VolkerStevin Head of HSEQS 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

Head of HSEQS (reporting to the MD)

It is the responsibility of the Head of HSEQS 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, company and other requirements
- Assist the MD in setting realistic goals for continual improvement in environmental performance
- Develop the IMS 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 IMS
- Play a key part in improving the environmental performance of our activities
- Represent VolkerStevin 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 VolkerStevin 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

Environmental Management - HSEQS Team

It is the responsibility of the HSEQS Team to:

For the purposes of clarification under ISO 14001, environmental management is not outsourced. Dedicated Environmental Advisors are directly employed by the operational divisions of VolkerStevin and external environmental consultants are used when required.

In addition to this, VolkerWessels UK (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.

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6 ORGANISATION AND ARRANGEMENT (CONTINUED)

Environmental Manager / Advisor (reporting to the Head of HSEQS)

It is the responsibility of the Environmental Manager / Advisor to:

- Dedicated Environmental Advisors are directly employed by VolkerStevin and external environmental consultants are used when required. Inform, guide and support the workforce and in doing so create workplaces with a positive attitude to environmental management
- Play a key part in improving the environmental performance of our activities
- 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 VolkerStevin 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 on environmental training requirements
- Ensure that VolkerStevin's environmental management documentation is appropriate and maintained to reflect any changes in legislation, company and other requirements
- Maintain their competence through continual professional development
- Adhere to a professional code of conduct as set through membership of the Institute of Environmental Management and Assessment (IEMA), the Chartered Institute of Wastes Management (CIWM), the Chartered Institution of Water and Environmental Management (CIWEM) or the Institute of Ecology and Environmental Management (IEEM)
- Identify opportunities for improvement

Corporate Responsibility Director (reporting to VolkerWessels UK CEO)

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

- Implementation and development of sustainable business practices throughout VW UK shared services and business units
- Maintaining compliance to corporate, legal, and stakeholder requirements
- 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 VolkerWessels 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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6 ORGANISATION AND ARRANGEMENT (CONTINUED)

Integrated Management Systems (IMS) Managers (reporting to Corporate Responsibility Director)

It is the responsibility of the IMS Managers to:

- Establish the EMS requirements in line with BS EN ISO 14001:2015
- Work with the Corporate Responsibility Director and HSEQS teams to ensure legal, sector specific, and other requirements are integrated within the EMS
- Coordinate 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 / 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 to the appointed Environmental Advisor, carry out investigations, make recommendations to prevent recurrence and ensure this information is effectively communicated
- Arrange environmental inspections and audits with the appointed Environmental Advisor
- Ensure that weekly health, safety and environment inspections are carried out
- Implement the advice given by the company's appointed Environmental Advisor
- Attend environmental training arranged by the company

Site Foreman / Ganger

It is the responsibility of foremen and gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of environmental protection as it applies to particular construction operations Encourage the workforce to work in an environmentally acceptable and tidy manner, and where necessary, discipline 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 Advisor
- Cooperate and liaise where appropriate with other contractors' site supervision

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6 ORGANISATION AND ARRANGEMENT (CONTINUED)

Commercial / Estimating / Procurement Managers

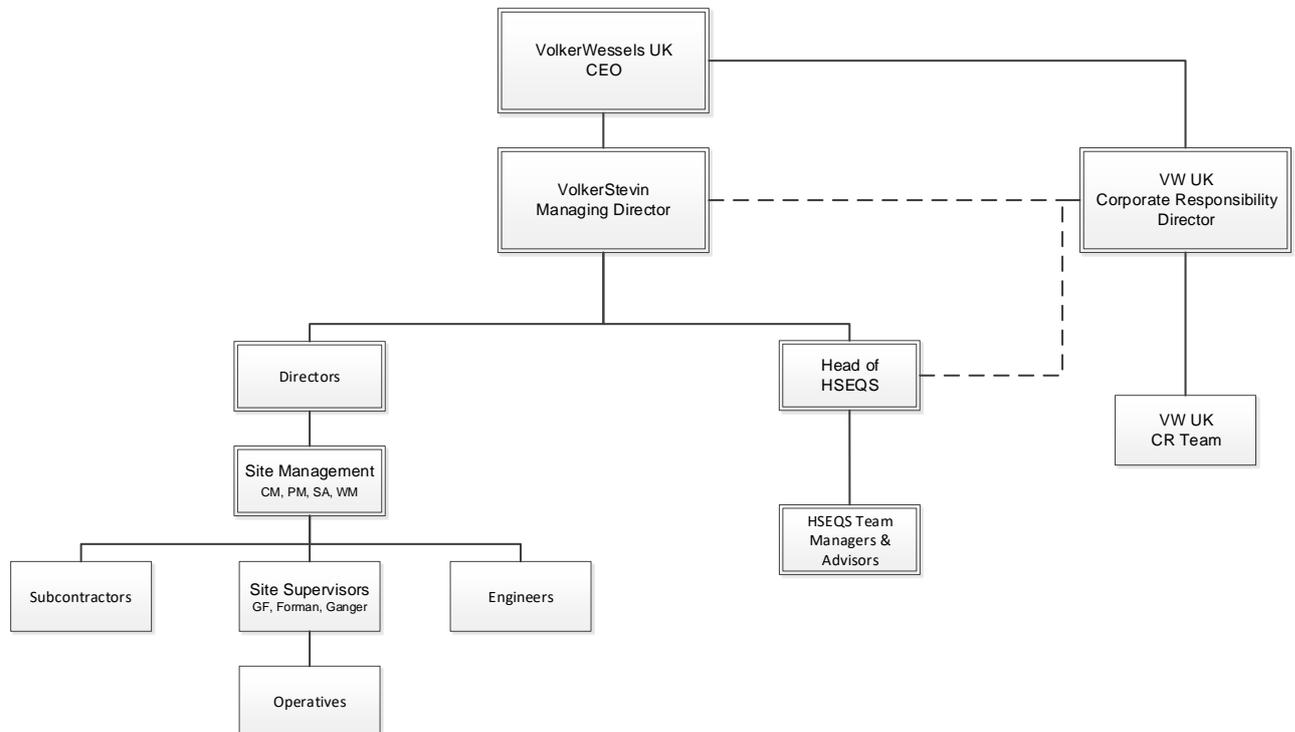
It is the responsibility of the Commercial, Estimating and Procurement Managers to:

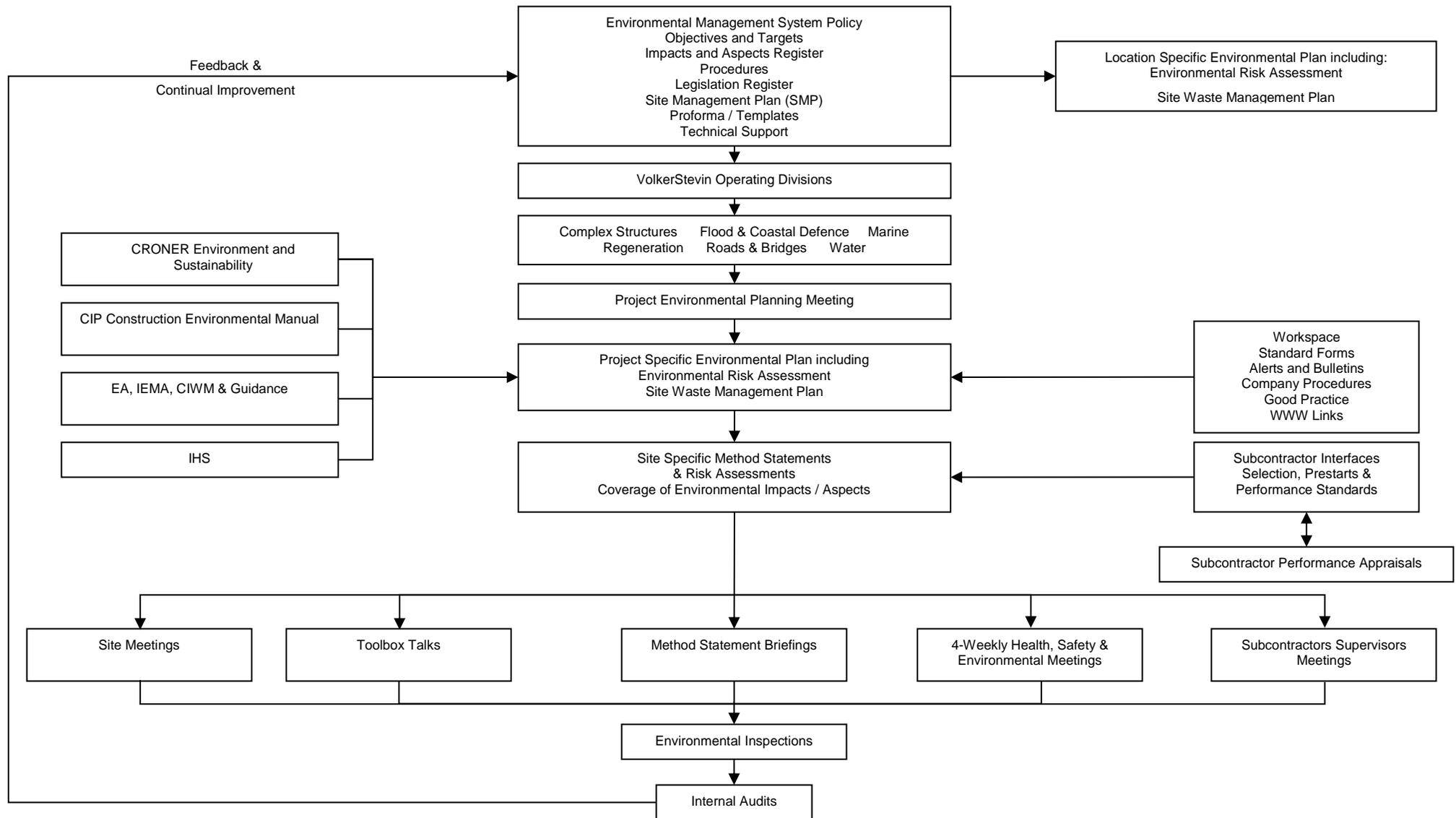
- Ensure subcontractors and suppliers working on behalf of VolkerStevin are aware of the environmental policy and practice document and are provided with site specific procedures and environmental management plans
- Ensure the Procurement Policy is communicated to all subcontractors and suppliers.
- 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 Advisor
- 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

All Employees, Subcontractors and any other Person 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 and environmental compliance 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





7 CHECKING AND CORRECTIVE ACTION

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

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

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.

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

- Q03 *Audit*
- Q04 *Non Conformance and Corrective Action*
- Q06 *Preventive Action*
- Q08 *Measure and Test Equipment*

8 PREVENTIVE MEASURES**Water Pollution**

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

- Consent will be obtained from the relevant environmental regulator 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 regulator
- 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, encourage suppliers to use facilities at the production plant

Noise Pollution

VolkerStevin 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

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.

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8 PREVENTIVE MEASURES (CONTINUED)**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

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 9 for further information).

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.

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.

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.

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, VolkerStevin 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.

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9 WASTE MANAGEMENT**Strategy**

A Waste Coordinator is appointed on all VolkerStevin projects and whilst everyone on site will be called upon to do everything they can to minimise waste, it is the waste coordinator's responsibility to 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 consent from the appropriate authority, and monitor at all times

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.

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.

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.

Site Waste Management Plans

All sites, regardless of size or value will complete EMS-03 *Site Waste Management Plan* (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 Corporate Responsibility for annual objectives, benchmarking and for the driving of waste reduction strategies.

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10 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.

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.

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.

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.

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.

Bunded Storage Areas

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

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.

11 PROCUREMENT POLICY**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.

VolkerStevin 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.

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

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.

Environmental Policy and Practice

Issue 4.1, January 2018

11 PROCUREMENT POLICY (CONTINUED)**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, Purchasing Director and Corporate Responsibility Director.

Business Ethics

VolkerStevin 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

Company Procedures

Company procedures and details relating to 'Procurement':

- E05 *Use of Biodegradable Hydraulic Oils*
- E07 *Mobile Crushing Site Guide*
- E09 *Use of Materials on Projects*
- E10 *Sustainable Timber and Timber Derived Products*
- P01 *Tender Procurement*
- P02 *Materials Procurement*
- P03 *Subcontract Procurement*
- P04 *Overhead Procurement and External Expenditure*

12 IMS AUTHORISATION**Document owner approval:**

Duncan Aspin, Head of HSEQS - 19.01.2018

Approval for IMS:

Sarah Howard, IMS Controller- 22.01.2018

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