

ENVIRONMENTAL POLICY DOCUMENT

JULY 2024

*This Policy document applies to Galliford Try Holdings plc and
INCLUDES: Morrison Construction Limited, Galliford Try, Construction
Limited, Galliford Try Infrastructure Limited and all subsidiaries.*

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Foreword

This Environmental Policy Document has been produced for Galliford Try Holdings Plc (Galliford Try) and for the following who are part of the Galliford Try Group of companies:

Galliford Try Construction and Investments Limited; Galliford Try Construction Limited (formerly Building Limited), Morrison Construction Limited, Galliford Try Employment Limited, Galliford Try Infrastructure Limited, Galliford Try Facilities Management Limited, Rock and Alluvium Limited, Specialist Services Limited, Lintott Control Systems Limited, Ham Baker Engineering Limited, and all subsidiaries.

This Environmental Policy Document details the Galliford Try declaration of intent in respect of environmental management and aims to assist all employees in meeting minimum environmental legal requirements in line with the Environment Policy Statement.

Galliford Try will conduct its activities, so far as is reasonably practicable, in an environmentally responsible manner that does not expose the natural environment or our neighbours to unacceptable environmental risks.

Galliford Try recognises that every employee whilst at work must take reasonable care not to adversely impact the natural environment or our neighbours as a result of his or her work activities.

The Environmental Policy is based on legislative compliance, as a minimum. However, Galliford Try will also aim to raise the standards within the Company to exceed the industry environmental standard.

In order to minimise the impact upon the environment from our activities, we will:

- ◆ Assess the risks to the environment and to our neighbours from our work activities
- ◆ Have effective arrangements in place for the planning, organising, controlling, monitoring and reviewing of preventative and protective measures
- ◆ Appoint competent persons to help in undertaking the measures needed to comply with environmental law; and
- ◆ Provide employees with comprehensible and relevant information on the environmental risks and the preventative and protective measures necessary to control those risks.

All contractors employed by the Company shall be required to demonstrate a similar commitment to the management of environmental issues.

The Environmental Policy consists of three parts:

1. The Environmental Policy Statement is the declaration of intent, signed by the Executive Board, which sets out the required environmental standards to be achieved across the Company and the management commitment to those standards in terms of accountability.
2. The Organisation Responsibilities details the environmental responsibilities across the Company.
3. The Arrangements for environmental cover the systems the Company has in place to assist in ensuring effective environmental management across the workplace.

GALLIFORD TRY HOLDINGS Plc

ENVIRONMENTAL POLICY DOCUMENT



1.0 Policy Statement

Galliford Try Holdings plc

Environmental Policy Statement



Galliford Try is committed to protecting the environment, by adopting sustainable resourcing and consumption practices and taking measures to mitigate carbon production and climate change to protect our environment and biodiversity. We fully understand our responsibility under current environmental legislation and believe that all incidents are preventable.

OUR VISION ... we aspire to no harm by creating and maintaining an environment where caring for our people and the environment and communities in which we work is a priority.

OUR COMMITMENT ...our Leaders will ensure:

	Visible leadership and collaboration with our employees, supply chain and stakeholders to meet their needs and to improve our performance.
	A set of clear business unit environmental performance objectives are defined, monitored and communicated, aligned to business wide priorities.
	A positive environmental culture by investing in our Challenging Beliefs, Affecting Behaviour programme.
	All employees are suitably trained, competent and understand their environmental responsibilities.
	We will support and empower our teams to positively report environmental hazards, risks and opportunities without reprisal.
	Suitable resources, facilities and finances are provided.
	Relevant and suitable environmental training, instruction and information is provided.
	Environmental support and advice are provided at all stages of a project, to protect the environment.
	Compliance with all statutory provisions and industry best practices.
	Regular monitoring of our performance to identify continual improvement.
	Annual leading and lagging indicators are set, monitored, communicated and understood.
	Suitable actions are taken following any incidents or non-conformances to support learning and improvement to support learning and improvement.

BUSINESS WIDE PRIORITIES 2024/25

To deliver on our commitment, as a multidisciplined business, we will:

- ◆ Maintain and implement suitable arrangements and management practices, certified to ISO 14001.
- ◆ Maintain environmental performance metrics to support our continual improvement journey.
- ◆ Minimise waste production and divert waste away from landfill by promoting resource efficiency, recycling, and the re-use.
- ◆ Protect and preserve natural habitats, flora and fauna and where appropriate enhance biodiversity.
- ◆ Embed our carbon road map in pursuit of our accreditation to PAS 2080.
- ◆ Review this policy and communicate and make available to interested parties.

Signed for and on behalf of the Executive Board:

Bill Hocking, Chief Executive
Galliford Try Holding Plc

Reviewed: July 2024

This Policy applies to Galliford Try Holdings plc and INCLUDES: Morrison Construction Limited, Galliford Try, Construction Limited, Galliford Try Infrastructure Limited and all subsidiaries.

2.0 Organisational Responsibilities Statement

Each Galliford Try Business Unit has its own Management Board that deals with all operational environmental matters. The Directors within Galliford Try have ultimate responsibility for the execution of their business operations in an environmentally responsible manner together with Operational Directors and Managers, and with support from the Health, Safety and Environmental Director.

Within each of the Business Units the Directors and General Managers have responsibility for environmental matters in their operations with the support of their environmental support staff.

The immediate responsibility for environmental management in each workplace is carried by the most senior line manager involved.

Responsibilities have been outlined in this document for each of the following roles:

- 2.1 Galliford Try Executive Board
- 2.2 Health, Safety and Environmental Director
- 2.3 Divisional Board
- 2.4 Business Unit Board
- 2.5 Business Unit Managers
- 2.6 Health, Safety and Environmental Support Staff
- 2.7 Designers, Design and Build Managers
- 2.8 Senior Site Managers
- 2.9 Temporary Works Co-ordinators
- 2.10 Engineering Staff
- 2.11 Site Supervisors
- 2.12 Commercial and Site Support Staff
- 2.13 Operatives
- 2.14 All Personnel

Note: Where such roles do not exist, it is the responsibility of the Business Unit Board to re-assign the environmental roles accordingly.

2.1 Galliford Try Executive Board

Definition: Executive Board chaired by the Chief Executive Officer and comprising Chief Executive Directors, Finance Director, Divisional Managing Directors, and the Company Secretary. Responsible for the executive management of the company.

The Galliford Try Executive Board has overall responsibility for ensuring that operations are conducted in an environmentally responsible manner to minimise disturbance to the natural environment and neighbours who may be affected by Galliford Try operations.

In meeting the Galliford Try Environmental Policy the Executive Board should, where reasonably practicable:

- a) Provide the organisation, finances, and resources necessary for the implementation of the Galliford Try Environmental Policy.
- b) Appoint an Executive Board Director to be responsible for the environment.
- c) Include environmental matters in Executive Board meetings and monitor the Galliford Try's environmental performance and respond accordingly.
- d) Take reasonable steps to ensure that Galliford Try complies with environmental legislation.

2.2 Health, Safety and Environmental Director

Definition: Non-board director qualified as a professional in Health, Safety and Environment – reports directly to Executive Board Directors and manages the Health, Safety & Environmental Systems and Teams.

In meeting the Galliford Try Environmental Policy where reasonably practicable, the Health, Safety and Environmental Director shall ensure that:

- a) The Environmental Policy is reviewed and updated, as appropriate.
- b) The Business Units are advised of new and forthcoming legislation specific to their scope of work.
- c) Adequate resources are in place for the required level of environmental performance monitoring and reporting.
- d) Effective performance monitoring through environmental reviews is implemented and proactive environmental support is provided to the Business Units.
- e) Monthly environmental performance reports are provided to the Galliford Try Executive Board.
- f) Annual reports are provided on the performance of the Galliford Try Group.
- g) Environmental training requirements / competency levels are clearly defined for all staff levels.
- h) Communication of environmental information is provided in an appropriate manner.

2.3 Divisional Board

Definition: Divisional Managing Director, Business Unit Managing Directors, and other Divisional Directors responsible for matters concerning the management of the Division.

The Divisional Board has overall responsibility for ensuring that operations are conducted in an environmentally responsible manner to minimise disturbance to the natural environment and neighbours who may be affected by Galliford Try operations.

In meeting the Galliford Try Environmental Policy the Galliford Try Divisional Board Directors should, where reasonably practicable:

- a) Ensure there is an appropriate number of professional environmental personnel to assist in planning, inspection, monitoring and incident investigation.
- b) Provide the organisation, finances and resources necessary for the implementation of the Galliford Try Environmental Policy.
- c) Include environmental matters in Divisional Board meetings and monitor the Division's environmental performance and respond accordingly.
- d) Take reasonable steps to ensure that the Division complies with environmental legislation applicable to the scope of their operations.
- e) Direct the Division in relation to any perceived improvements required in environmental standards.

2.4 Business Unit Board

Definition: Business Unit Board, chaired by the Business Unit Managing Director and comprising other Business Unit Board Directors. Responsible for matters concerned with the management of the Business Unit.

The Business Unit Board has overall responsibility for ensuring that operations are conducted in an environmentally responsible manner to minimise disturbance to the natural environment and neighbours who may be affected by Business Unit operations.

In meeting the Galliford Try Environmental Policy the Board Directors of each Business Unit should, where reasonably practicable:

- a) Provide the organisation, finances, and resources necessary for the implementation of the Galliford Try Environmental Policy.
- b) Be aware of the Environmental Policy requirements and other environmental statutory requirements affecting their operations and seek further advice, when necessary.
- c) Include environment in Business Unit Board meetings and monitor the Business Unit's environmental performance and respond accordingly.
- d) Accommodate a sufficient number of competent environmental personnel to implement the requirements of the Environmental Policy.
- e) Instruct operational managers to take immediate action when Health, Safety & Environmental Advisors / Environmental Leads require work operations to be stopped, where potential environmentally damaging working practices are observed.
- f) Ensure that staff at all levels receive the appropriate environmental training, as agreed by the Divisional Board.
- g) Ensure that staff under their control are provided with the Environmental Policy and are conversant with its requirements.
- h) Ensure appropriate data is provided on environmental incidents, environmentally related complaints, and enforcement action to enable the HS&E Director to formulate monthly reports.
- i) Monitor the environmental performance of sites, including Health, Safety & Sustainability Advisors' performance reports / environmental audits, and take the appropriate action whenever environmental performance fails to meet the company's environmental standards.
- j) Actively promote at all levels Galliford Try's commitment to effective environmental management.
- k) Ensure environmental incident investigations are completed and that any non-compliances reported on internal or external environmental reports / audits are appropriately closed out.
- l) Ensure all significant environmental incidents are reported to the HS&E Director, solicitors, insurers and other bodies, as appropriate.
- m) Ensure that any environmental enforcement notices are discussed with the HS&E Director and responded to in a timely manner.
- n) Ensure that a suitable internal environmental forum, e.g. team briefing, environmental review meeting or other, which includes the attendance of senior management, operational, and environmental personnel, is held at regular intervals to discuss the environmental performance of the Business Unit and agree actions for continual improvement, as appropriate.

- o) Ensure effective consultation and communication of environmental information throughout the Business Unit.

2.5 Business Unit Managers

Definition: Non-Board Directors, Operation Directors / Managers, Project Directors / Managers, Construction / Contract Managers and other managers with responsibility for other employees. Note where a Business Unit Manager does not exist Business Unit Directors shall reassign their responsibilities accordingly.

In meeting the Galliford Try Environmental Policy and management systems the Business Unit Managers should, where reasonably practicable:

- a) Be aware of the Environmental Policy requirements and other environmental statutory requirements affecting their core operations and seek further advice, when necessary.
- b) Ensure that there is a system for formally appointing personnel to be responsible for environmental matters in every workplace.
- c) Ensure that there is adequate supervision in place to cover all workplaces and work operations as appropriate, and to report and manage any environmental incidents.
- d) Ensure that regular environmental reviews take place at all workplaces, as appropriate and, in conjunction with the workplace management team and environmental support staff.
- e) Monitor the overall environmental performance of all operations under their control and ensure that appropriate action is taken whenever operations fail to meet the company's environmental standards.
- f) Engage on environmental matters with operational staff at regular workplace management meetings.
- g) Ensure operational staff have adequate planning time, resources, information, skills and training to carry out the operations in accordance with the environmental standards.
- h) Report through appropriate line management any problems with, or improvements required to, this Policy.
- i) Actively promote at all levels Galliford Try's commitment to effective environmental management.

2.6 Health, Safety and Environmental Support Staff

Definition: Head of Environmental, HS&E Systems Manager / HS&E Auditors / Heads of, and Divisional Director, of Health, Safety & Environmental / Advisor / Environmental Lead / Advisor.

In meeting the Galliford Try Environmental Policy all health, safety and environmental support staff should, where reasonably practicable:

- a) Provide specialist environmental input to operational staff from planning to completion through advice, guidance and support.
- b) Carry out an environmental review at all workplaces on a regular basis, as appropriate, to ensure compliance with the Galliford Try Environmental Policy.
- c) Where working practices are observed that pose a significant environmental risk, ensure that, where possible, the activity is stopped; inform site and Business Unit management immediately; provide appropriate support, advice and assistance in identifying and implementing the necessary remedial actions.
- d) Provide suitable environmental information to the Business Unit in the form of staff briefings, annual update forums, workshops, presentations etc. and support and participate in any Company environmental induction programmes, as appropriate.

- e) Collate environmental information, as provided by workplace management, for monthly reports.
- f) In conjunction with the operational staff, identify areas / operations that require specific environmental improvement and assist in the organising or undertaking of such improvements, as appropriate.
- g) Provide information in the form of instructions, Best Practice Guidance, Codes of Practice, Environmental Information Sheets etc, as appropriate, and ensure operational staff are provided with communications on effective environmental working practices and alerts.
- h) Ensure environmental induction instructions are reviewed regularly for relevance to current operations and ensure that they are being effectively communicated.
- i) Assist operational staff in the review of environmentally high-risk contractors' method statements, provide appropriate assistance in assessing other environmentally related method statements, and monitor the implementation of the same in the workplace, as appropriate.
- j) Assist Business Units in the environmental performance management of contractors.
- k) Assist project management through advice, information, training and encouragement, as appropriate, to ensure that projects continually meet the Galliford Try Policy and the environmental standards.
- l) Ensure that the relevant manager is advised if operations are not achieving the required environmental standards, and further advise the Operations Director, Business Unit Managing Director and HS&E Director as appropriate.
- m) Communicate effectively with the Environment Agency (EA), Scottish Environment Protection Agency (SEPA) or Natural Resources Wales (NRW) and other enforcing bodies regarding this Environmental Policy and all relevant environmental inspections and incidents.
- n) Ensure that significant environmental incidents are reported promptly to the Business Unit Directors, Environmental Manager and HS&E Director and the EA / SEPA / NRW, as appropriate.
- o) Promptly investigate all environmental incidents and make known and discuss any significant findings / recommendations within the Business, as appropriate.
- p) Liaise with Business Unit Managers on operational environmental standards.
- q) Provide feedback to the HS&E Director on the effectiveness of the Company's environmental management systems and any improvements necessary.
- r) Promote involvement in environmental management of all operational staff by discussion, briefings, training sessions and effective communication.
- s) Review all workplaces in line with current environmental laws.
- t) Monitor the Business Units to ensure that all staff, including office-based personnel, receive appropriate environmental training and instructions.

2.7 Designers

Definition: Any persons involved with the preparation, modification, or specification of design, or arranges for or instructs any person under their control to do so.

In meeting the Galliford Try Environmental Policy all Designers and Design and Build Managers should, where reasonably practicable:

- a) Ensure that all designs are carried out in compliance with the relevant legislation, this Environmental Policy and the Company's environmental management system.
- b) Ensure that regular design reviews and assessments are jointly undertaken with the design and operational staff, as appropriate.
- c) Ensure competency assessments are carried out where design consultants are employed.
- d) Report through appropriate line management any problems with, or improvements required to, this Policy or to the environmental management system.

2.8 Senior Site Managers

Definition: Project Manager, Site Manager or other persons appointed as the most senior person with overall responsibility for managing projects, sites or premises.

In meeting the Galliford Try Environmental Policy all Senior Site Managers should, where reasonably practicable:

- a) Be aware of the Galliford Try Environmental Policy requirements, the Company's environmental management systems and other environmental statutory requirements affecting their operations and seek further advice, when necessary.
- b) Ensure that all Supervisors are aware of their environmental responsibilities.
- c) Ensure all new employees, contractor's employees and visitors, including delivery drivers, are instructed on the relevant sections of the Environmental Policy and any location-specific environmental requirements.
- d) Organise and plan workplaces so that work is carried out in accordance with the company's environmental management systems with minimum risk to the natural environment and / or our neighbours.
- e) Bring to the attention of the Business Unit Manager and Health, Safety & Sustainability Advisor / Environment Manager, as appropriate, any environmental improvement required, or problems being encountered.
- f) Plan environmental requirements into all operations in accordance with the environmental management systems.
- g) Ensure adequate supplies of environmental control equipment (e.g. spill response equipment) are available and are appropriately used.
- h) Accompany all EA / SEPA / NRW Inspectors and Enforcing Officers on their visits to sites / workplaces.
- i) Make full use of the services of the Health, Safety & Sustainability team and ensure that all reasonable recommendations are actioned. Report immediately any environmental incidents, or enforcing bodies' visits to their Health, Safety and Sustainability Team.
- j) Ensure that all contractors are made aware of their responsibilities for environmental matters on the project.
- k) Actively promote at all levels Galliford Try's commitment to effective environmental management.
- l) Ensure that all environmental risk assessments are effectively monitored, reviewed and communicated at the workplace.

- m) Identify the environmental requirements within method statements and ensure that they are produced and reviewed on time. Identify method statements required distribution (e.g., foremen, supervisors, operatives, and customers) and ensure that they are followed and controlled, as appropriate.

2.9 Temporary Works Co-ordinator

Definition: Structural Engineer, other Engineer or competent person appointed to be involved with the management of design of formwork, temporary supports and scaffold etc.

In meeting the Galliford Try Environmental Policy any person appointed as a Temporary Works Co-ordinator should, where reasonably practicable:

- a) Ensure that temporary works programmes and design briefs include all relevant environmental information e.g. any identified environmental risks.
- b) Ensure that all the temporary works needs of a project are identified through an appropriate technical review.
- c) Ensure that temporary works are constructed and dismantled in accordance with environmental legislative requirements and that all relevant environmental permissions are in place.
- d) Work to the specifics of the Company's temporary works processes.

2.10 Engineering Staff

Definition: Any trained engineer who provides technical guidance, solutions and expertise for project.

In meeting the Galliford Try Environmental Policy all Engineering Staff should, where reasonably practicable:

- a) Be aware of the Galliford Try Environmental Policy requirements and other environmental statutory requirements affecting their operations and seek further advice, when necessary.
- b) Ensure that persons under their control are fully briefed and work in an environmentally responsible manner.
- c) Assist the managers and Foreman / Supervisors in achieving the company's environmental management system requirements by reporting potential environmentally damaging working practices.
- d) Take an active part in any site environmental meetings attended.
- e) Ensure that they are aware of the contents of any relevant environmental risk assessments, method statements and environmental planning meetings that concern the environmental management of their operations.

2.11 Site Supervisors

Definition: Assistant Site Manager, Site Agent, all Supervisory Staff, Works Managers, Foreman, Gangers, Team Leaders or any other person in charge of the works, with responsibility for the supervision of people, materials, equipment etc.

In meeting the Galliford Try Environmental Policy all Site Supervisors should, where reasonably practicable:

- a) Be aware of the Galliford Try Environmental Policy requirements and other environmental statutory requirements affecting their operations and seek further advice, when necessary.
- b) In conjunction with the Senior Site Manager, ensure all new employees, contractor's employees and visitors, including delivery drivers, are instructed on the environmental management system and any project specific environmental requirements, as appropriate.
- c) Ensure that all relevant persons are briefed on the contents of any environmental risk assessment and method statements produced and monitor operatives (including contractors) for compliance.

- d) Ensure that an adequate supply of environmental control equipment (e.g. spill response equipment) is kept on the site and implement disciplinary procedures against any employee who abuses or does not make full use of this equipment, when required.
- e) In conjunction with the Senior Site Manager plan environmental standards into work activities.
- f) In conjunction with the Senior Site Manager discuss environmental matters with all supervisors, including contractors, on a regular basis, and record where appropriate.
- g) Ensure all statutory and specific inspections are carried out as prescribed in the environmental management system.
- h) Make full use of the services of the Health, Safety & Sustainability Advisors and co-operate with them to achieve the desired environmental standards at all workplaces.
- i) Follow the environmental management systems and report any problems in achieving these standards to the Senior Site Manager and Health, Safety & Sustainability Advisor, as appropriate.
- j) Actively promote at all levels the Galliford Try commitment to effective environmental management.
- k) Ensure the requirements of all environmental risk assessments are brought to the attention of all relevant operatives.
- l) Actively encourage employees to report environmental problems.

2.12 Commercial and Site Support Staff

Definition: Planners Pre-commencement Managers and Land Buyers, Estimators, Surveyors, Buyers etc. who are involved in the procurement of resources e.g. materials, labour, equipment, drawings, advice, information, etc.

In meeting the Galliford Try Environmental Policy all Commercial and Site Support Staff should, where reasonably practicable:

- a) Ensure persons under their control work in an environmentally responsible manner.
- b) Assist the workplace management in achieving the environmental standards at any site, by reporting potential environmentally damaging operations and conditions.
- c) Suggest ways of improving overall environmental performance.
- d) Ensure the provision of support services does not knowingly compromise the environmental standards in place.
- e) Abide by any environmental rules and instructions given at any location-specific induction.

2.13 Operatives

Definition: Labourer, ground worker, machine operative, tradesman or another worker in a non-managerial / supervisory role.

In meeting the Galliford Try Environmental Policy all operatives should, where reasonably practicable:

- a) Make themselves familiar with the Environmental Policy and adhere to all the site rules, notices and procedures made known to them.
- b) Actively participate in the management of environmental issues by reporting all environmental incidents.
- c) Where appropriate, participate in environmental committees or other formal environmental consultation procedures.

- d) Work in an environmentally responsible manner and follow defined environmentally acceptable work practices for the site, which may be set out in method statements, risk assessments, site rules, or otherwise.
- e) Refrain from working if they think their work activities will contribute to a significant impact to the natural environment or neighbours and inform their immediate line manager of their concerns.

2.14 All Personnel

Definition: Any employee regardless of employment status e.g. labour only, self-employed.

In meeting the Galliford Try Environmental Policy all personnel are required to work in an environmentally responsible manner to minimise disturbance to, and enhance where possible, the natural environment and neighbours who may be affected by their work activities. Galliford Try expects a reasonable and responsible attitude from all personnel towards meeting their environmental obligations whilst at work.

All employees should, where reasonably practicable:

- a) Be conversant with the relevant requirements identified in the Galliford Try Environmental Policy and the environmental management system.
- b) Set a personal example by using environmental control equipment (e.g., spill response equipment), when and where appropriate.
- c) Work in an environmentally responsible manner at all times, take appropriate action where potential environmentally damaging working practices are observed and report these practices to the relevant manager.
- d) Assist Galliford Try in achieving the required environmental standards. Individuals who are considered to consistently ignore this aim shall be subject to disciplinary action.
- e) Use and maintain the correct tools and equipment and keep such tools and equipment in good condition, reporting any defects to the appropriate person.
- f) Abide by any environmental rules and instructions given at any location specific induction.
- g) Refrain from working if they think their work activities will contribute to a significant impact to the natural environment or neighbours and inform their immediate line manager and Business Unit Director of their concerns.

Note:

Refusal or consistent failure to comply with the Galliford Try Environmental Policy and environmental standards will be considered a serious disciplinary offence.

All employees and contractors are expected to co-operate with Galliford Try in the implementation of the Environmental Policy and will ensure that their own work, so far as is reasonably practicable, is carried out with minimum risk to the natural environment or neighbours.

3.0 Environmental Arrangements

3.1 Document Issue and Control

The Environmental Policy is produced and controlled by the HS&E Director.

The document shall be reviewed, and revised as necessary, at intervals not exceeding one year. Interim revisions will be issued as addenda, when necessary.

A copy of this Environmental Policy document will be issued to all employees and made available to other interested parties, as appropriate.

3.2 Application

The Environmental Policy has been produced for all activities undertaken by Galliford Try that form part of their scope of works, this includes offices, sites and off-site operations.

Galliford Try recognises that regulations, custom and practice will differ between Business Units, but will adopt and implement, as a minimum, the standards set out in the Galliford Try Environmental Policy. The Director of the Division and Senior management will ensure that this Policy is used as the basis of all operation-specific environmental management, and that any processes developed by individual operating units incorporate Company guidance and requirements.

Where a Division enters into a Joint Venture with one or more other entities, an agreement will be made, as part of the Contract, as to which environmental management system will be utilised for operations. Where this is not the Galliford Try Environmental Policy then Divisional Board authorisation and Galliford Try Executive Board notification is required.

3.3 Planning

Planning is an essential factor in meeting the Environmental Policy to identify the measures required to achieve effective risk management across the Company.

3.3.1 *Environmental Risk Assessment and Control*

At all workplaces, Galliford Try management will identify and assess potential environmental risks and record the findings. Subsequent control measures for the management of environmental risk will reflect the principle of risk elimination where reasonably practicable, followed by risk reduction, with the adoption of environmental control equipment as a last resort.

Galliford Try managers and supervisors will apply the Company's environmental management system, as appropriate to meet the specific demands of the workplace, to ensure that environmentally responsible work operations are adopted, so far as is reasonably practicable.

Galliford Try will provide environmentally responsible work practices through:

- Effective organisation and planning;
- Evaluation of environmental risk;
- Identification of the appropriate controls, so far as is reasonably practicable, utilising the environmental management systems
- Production of suitable and sufficient environmental risk assessments, method statements, etc; and
- Supervision, inspection, monitoring and review.

3.3.2 *Legal and other Requirements*

Galliford Try will maintain a process for identifying and assessing the legal and other requirements applicable to it. This information will be kept up to date and communicated to its employees and other relevant interested parties as appropriate.

3.3.3 *Objectives*

The Company will develop and maintain documented and measurable environmental objectives, as appropriate and in agreement with the Galliford Try Executive Board. This shall cover areas for improvement across the Group as a whole.

Business Units in turn shall develop specific objectives as appropriate and in line with those agreed by the Divisional Board and specific business parameters.

3.4 Implementation and Operation

3.4.1 *Training, Awareness and Competence*

Galliford Try will adopt a risk-based approach to ensure all staff are provided with appropriate training and awareness according to their position, the work they are to undertake and their environmental responsibilities. Personnel with key environmental roles and the appropriate competency levels shall be formally appointed at all workplaces.

Environmental training requirements will be identified for each level and function across the company and training provided, as necessary. The Business Units will maintain systems for ensuring individuals have acquired and maintained the knowledge and competency required. Records of training will also be maintained by each Business Unit.

3.4.2 *Consultation and Communication*

The environmental management systems are structured to ensure that all personnel have a clear understanding of what is expected, and what role the individual plays, in relation to environmental management.

Galliford Try encourages participation in good environmental practice and improvements to company standards from all those affected by its operations. To that end, appropriate means of environmental communication shall be planned into all works at workplace, operation, contractor and individual level to ensure effective communication and consultation.

3.4.3 *Operational Control*

Galliford Try will maintain performance standards for activities associated with known environmental risks to ensure, so far as is reasonably practicable, that minimum legal requirements are met, effective control and counter measures are applied, and risk control is continually improved.

Performance standards take the format of documented environmental management systems. These are subject to regular review, and amendment where necessary, to ensure their continued suitability, adequacy and effectiveness.

Due to the variance of activities, management may need to take account as to the application of the performance standards in certain situations.

Performance standards include, but are not limited to, the identified risks involved in the following areas:

Ecology

Standards include conducting ecological surveys, where appropriate; assuring the competency of ecological contractors; programming works to avoid sensitive ecological constraints; avoiding damage or disruption to protected flora and fauna; gaining regulatory approvals; and monitoring ecological performance.

Nuisance

Standards include conducting baseline surveys, where necessary; gaining regulatory approvals; communicating with potentially affected parties; managing noise, odour, dust, traffic, visual, vibration and light impacts; and monitoring performance.

Water

Standards include consulting with regulatory bodies; conducting baseline water quality surveys, when appropriate; managing water abstraction, dewatering and discharge; working near watercourses and tidal waters; controlling washing operations; and monitoring water quality performance.

Waste

Standards include reducing construction waste streams; generating waste management plans; storing and handling construction wastes; and ensuring compliant disposal of all waste streams.

3.4.4 *Emergency Preparedness*

Each Business Unit will prepare, and periodically test as necessary, emergency plans and procedures appropriate to the environmental risks identified in each workplace. This may include, but is not limited to, emergency plans for spill response.

Emergency preparedness and response plans will be regularly reviewed after the occurrence of an emergency incident.

Emergency plans will include for; identification of potential emergencies; nominations of personnel to take charge of emergency situations; actions to be taken in an emergency; means of raising the alarm; and identification of any emergency equipment required.

The workplace specific environmental emergency plans should be communicated to employees during site induction training sessions.

3.4.5 *Discipline*

We take the management of environmental issues very seriously and shall take appropriate disciplinary action against any person whose behaviour falls below that expected by the Company in terms of environment management.

3.5 **Performance Measurement and Monitoring**

3.5.1 *Monitoring of Environmental Performance*

Galliford Try will identify and monitor environmental performance across all operations to ensure that, so far as is reasonably practicable, risk controls are implemented and effective, environmental policy requirements and objectives are being met, and lessons are being learnt from any management system failures.

Galliford Try will ensure that there is sufficient approved supervision on a continual basis to adequately monitor environmental performance, including any contractors' environmental performance. Each Division will maintain records, checklists, forms and registers as appropriate to document performance measurement.

All workplaces will be assessed by a Health, Safety & Sustainability Advisor on a regular and formal basis, as appropriate, to measure performance against the required environmental management system. Reports of performance measurement will be recorded, communicated, discussed and addressed throughout the Division and into Galliford Try Executive Board, as appropriate.

3.5.2 *Environmental Incident Reporting and Investigation*

The Company will identify responsibilities and standards to ensure that environmental incidents are reported, investigated and reviewed, as appropriate.

All environmental incidents will be reported, recorded and subject to appropriate investigation. Galliford Try will maintain processes to ensure that internal personnel and external interested parties are duly notified of relevant environmental incidents and any subsequent investigation, as appropriate.

Galliford Try will provide guidance to ensure that each environmental incident is investigated appropriately, to establish the facts of the event, identification of root causes, and corrective action required to prevent reoccurrence.

3.5.3 *Environmental Incident Analysis*

Information relating to environmental incidents and supporting data will be formally reported within the Group on a regular basis. This is to enable internal collation, analysis and reporting of data as an additional measurement of environmental performance. This information will be distributed throughout the company, as appropriate.

3.5.4 *Audit*

The company will conduct audits of their environmental management systems on a periodic basis to determine the level of conformity against planned environmental arrangements, and to ensure their environmental management systems remain suitable, adequate and effective.

Results of environmental audits will be forwarded to management for review and action, as appropriate.

Audits will be undertaken to ensure systems comply with the requirements of ISO 14001.

3.5.5 *Management Review*

The senior management of Galliford Try will review the overall performance of the environmental management system on a regular basis, to ensure its continued suitability, adequacy and effectiveness.

Records of the management review will be kept and distributed, as appropriate. These records will include the details, and implementation plan, of any required corrective action plan.

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