

STANDARDS to be met: UK Legislation, Company Law & ISO 14001:2015

1 Company Policy For Environmental Management

It is the policy of Willmott Dixon Holdings (referred to as "Group") to:

- a) Safeguard the Environment for habitats, stakeholders and property that may be affected by Group processes, by providing controls, so far as is reasonably practical, to mitigate its impacts.
- b) Conduct its undertakings in such a way as to ensure, so far as is reasonably practicable, that the environment is not adversely affected, or exposed to risk during the works. In addition, mitigate impact from and ensure resilience of business to forecasted environmental changes/extremes.
- c) Recognise its obligations to comply with all relevant environmental legislative requirements which apply to any aspects of the organisation's undertakings, and in the absence of legislation, to adopt good practice as Compliance Obligations.
- d) Organise and arrange its affairs to provide compliance with, and commit to, continual improvement of the Policy, including control and influence of value chain stakeholders.
- e) Undertake management reviews of this Policy and the associated Environmental Management System (EMS), which constitutes part of the Risk Management System (RMS). Periodically taking action if necessary to ensure its effectiveness and compliance with changes in the nature of the Groups operations, structure, legislation, best practice and procedures.

2 Scope of the System

The scope and structure for the system's operation is as depicted in RMS-RM-051 with the Directors responsible for environment and their defined areas of operation listed in RMS-RM-052.

3 Operation of the Policy

In carrying out the General Policy Statement it is the practice of Willmott Dixon Group to:

- a) Maintain an active interest in the implementation of the Company Policy for the Environment by Local Company Office's (LCO's) to ensure that all levels of management carry out their duties.
- b) Ensure that the managerial responsibility and accountability for the Environment, of its employees and others, that may be affected by its undertakings, is specified in writing.
- c) Ensure that competent resource with discipline specific and appropriate environmental training is provided, and that prevention is included in all relevant learning development programmes.
- d) Sustain awareness of the need to prevent Environmental incident in the minds of all employees. Investigate and ensure learning from all incidents/non-conformances.
- e) Take into account, when planning its work, any Aspects & Impacts, which may help to eliminate pollution and waste, as well as to be efficient in use of materials and resources.
- f) Ensure waste Duty of Care compliance directly with waste partners, with the exception of short duration, low risk/volume refurbishment works, where appointed waste broker may be used.
- g) Make appropriate incident prevention arrangements at the workplace and maintain liaison with all employers who have employees working at the same workplace as the company.
- h) Encourage the discussion of Environmental matters at all levels, including the setting up of arrangements for worker engagement and joint consultations with employees through their appointed Environmental representatives and at site/office welfare meetings.
- i) Prepare, discuss, agree, and review suitable amendments to the Company Policy for Environment, as considered necessary.
- j) Monitor performance and trends through the annual Management Review to set objectives, for continued improvement, with the SHE Compliance Panel.
- k) Ensure that this Policy is applied to all contracts, so far as is reasonably practicable.

4 **Organisation of the Policy**

- a) The responsibility for all matters related to the environment within the Willmott Dixon Group rests with the Group Director responsible for Non-Financial Risk and Compliance on behalf of the Group Chief Executive.
- b) The responsibility for all matters relating to the Environment within each Business rests with the respective Chief Operating Officer (COO).
- c) The Managing Director of each LCO is responsible to the Chief Operating Officer (COO), the Functional Heads and the respective Chief Executive of each Business within the Group structure for all matters relating to the Environment within their LCO (See RMS-RM-052).

5 **Arrangements for the Policy**

- a) Each LCO will inform all its employees of their responsibilities, including to.
 - o comply with environmental legislation and obligations
 - o plan their activities to protect the environment with measures to mitigate impact from their work, promoting practices that will reduce risks
 - o consider environmental conditions that may affect project delivery for their customers
 - o plan to deliver objectives that secure performance with continued improvement
- b) The appointed Group Inspectors will inspect, monitor, and report on the effectiveness of the Environmental application and practices of all LCO's and will, where necessary, enforce the Policy by imposing fines and/or prohibition notices.
- c) The appointed Group Environment Manager (GEM) will complete second party audits to inspect, monitor and report on the effectiveness of the Environmental Policies in detail and practices of all LCO's. GEM to advise where necessary to enforce the Policy, to impose fines and/or prohibition notices, pending site inspection or Group Inspector contact.
- d) Management review of the policy and performance, as well as continued improvement of the system, will be made by the SHE Compliance Panel, with cascade of performance action and continual improvements required led by the directors responsible for environmental management.



Julia Barrett
Chief Sustainability Officer

Group Director Responsible for Non-Financial Risk and Compliance
WILLMOTT DIXON HOLDINGS LIMITED

OTHER RELEVANT DOCUMENTS

- RMS-RM-041 Needs & Expectations of Interested Parties (NEIPs) Assessment**
- RMS-RM-042 Political, Economic, Social, Technological, Legal & Environmental (PESTLE) Analysis**
- RMS-RM-043 Sustainable Development Company Risks and Opportunities Assessment**
- RMS-RM-044 Value Chain Influence and Control**
- RMS-RM-051 Leaders Responsible for Risk and Obligation Management**
- RMS-RM-052 Organisational Structure for Risk and Opportunities Management**