

EWG-E-P-001 - Environmental Policy

Eric Wright Group Ltd and all subsidiary companies

January 2024



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Revision History

Version	Date	Revision Author	Summary of Changes
5c	Jan 23	Phillip Richardson	Annual review
5d	Jan 24	Phillip Richardson	Annual review



Introduction

The Eric Wright Group of companies and its subsidiaries “the Group” operate within the following industries and for the scope of activities stated:

- Construction
- Civil Engineering including rail contractors.
- Mechanical & Electrical Engineering
- Contractors
- Facilities Management (including property maintenance, catering, cleaning services)
- Designers
- Builders
- Property Development
- Residential House builder
- Property Owners/Investors
- Estate Planners
- Plant Hirers,
- Consultancy services including professional and technical services
- Operation of elderly care facilities

The following policy statement aims to establish the Group board's commitment to the strategic environmental management of the Group's companies and their key statutory and corporate responsibilities to their employee's, clients & stakeholders.

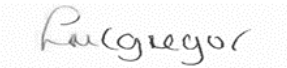
The purpose of the environmental management system is to encompass the ethos of Eric Wright Group's continued commitment to ISO 14001, from a projects inception and beyond; it is this value which will enable us to stay ahead of the competition and maintain our place as a barometer within the industry for good workmanship and service delivery to the highest possible standard.

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Signatures

Jeremy Hartley Chief Executive Officer Eric Wright Group	Signed  Date: 2 nd January 2024	 ERIC WRIGHT GROUP
John Hartnett Managing Director Eric Wright Construction	Signed  Date: 2 nd January 2024	 ERIC WRIGHT CONSTRUCTION PART OF THE ERIC WRIGHT GROUP
Diane Bourne Managing Director Eric Wright Civil Engineering	Signed  Date: 2 nd January 2024	 ERIC WRIGHT CIVIL ENGINEERING PART OF THE ERIC WRIGHT GROUP
Lesley McGregor Managing Director Eric Wright Partnerships	Signed  Date: 2 nd January 2024	 ERIC WRIGHT PARTNERSHIPS PART OF THE ERIC WRIGHT GROUP
George Lilley Managing Director Eric Wright Facilities Management	Signed  Date: 2 nd January 2024	 ERIC WRIGHT FACILITIES MANAGEMENT PART OF THE ERIC WRIGHT GROUP
Karen Hirst Managing Director Maple Grove Developments	Signed  Date: 2 nd January 2024	 MAPLE GROVE DEVELOPMENTS PART OF THE ERIC WRIGHT GROUP
Neal Whittle Managing Director Eric Wright Water Ltd	Signed  Date: 2 nd January 2024	 ERIC WRIGHT WATER PART OF ERIC WRIGHT CIVIL ENGINEERING
Jeremy Hartley Managing Director Appleshwaite	Signed  Date: 2 nd January 2024	 Appleshwaite



Environmental Policy Statement

The Eric Wright Group of companies are committed to reducing the impact of its activities on the environment for construction, civil engineering, water, facilities management and development projects.

We believe that effective environmental management results from a combined team effort. A systematic approach ensures the potential impacts of our activities are identified, assessed and mitigated.

With the support of the board of directors, the Eric Wright Group of companies are committed to pursuing the following objectives;

- Implement and maintain management systems to ensure effective planning, organisation, control, monitoring and review of environmental practices in line with the requirements of ISO 14001 standard.
- Compliance with all relevant environmental legislation
- Identification and management of environmental aspects (hazards) and impacts (risks) to prevent pollution to land, air and water.
- Protecting biodiversity and ecosystems, and where possible, enhancing the natural environment
- Reducing emissions to air resulting from our activities (greenhouse gases, dust, transport)
- Ensuring the efficient use of natural resources through waste elimination, minimisation and resource efficiency. Where waste production is unavoidable, aim to reuse, recycle and divert waste from landfill.
- Encouraging the use of sustainable construction principles and raise awareness of these through provision of advice to our clients and supply chain.
- Liaising with local communities and businesses so that contact can be made at the earliest opportunity to minimise statutory disturbance, non-statutory disturbance and social impact.
- Promoting the co-operation of all our employees through training, consultation and awareness raising. This will ensure staff are aware of the areas of environmental control they have within their job role and the environmental impact of their decisions in the workplace.
- Monitoring our environmental performance, including carbon management, as a basis for continual improvement
- Encouraging our supply chain to utilise sound environmental practices and sustainable resources.
- Reduce our greenhouse gas emissions as low as possible in order to minimise our impact on global warming and achieve our target of becoming net zero by 2030.

This policy statement is available to all our personnel, clients, interested parties and the public. The policy is reviewed annually and amended if appropriate.

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Sustainability Policy

The Group is committed in the delivery of its corporate responsibilities.

Our vision is to be a highly respected Group of companies in our industry and provide our clients with the highest possible quality of service through sustainable profitable growth.

Through continual review, and to demonstrate to our stakeholders, clients and supply chain the Eric Wright Group aims to target each of the areas covered by the three pillars of sustainability: demonstrating our commitment to sustainable development.

Social

Eric Wright Group aspires to avoid environmental harm, create opportunities and build positive relationships within those communities where our activities take us. We will seek to enhance those relationships by learning to understand the needs of the communities we work in. In addition, we will also seek opportunities and develop our own people through:

- Attracting high calibre staff and providing training and development to equip all employees to meet the future needs of the business and individuals.
- Respecting our people and encouraging them to respect others.
- Offering equal opportunities to all
- Celebrating a diverse workforce
- Creating training and job opportunities in those communities where we work
- Continuing with our aim of providing high standards of health and safety performance in all our projects and workplaces to minimise injuries and incidents.
- Encouraging and facilitating a positive work-life balance

Economic

The Eric Wright Group is committed to providing the highest possible quality of service and delivering sustainable profitable growth, for ourselves and the communities we work with through:

- Building relationships with our clients that maximise project value, minimise cost and seek out repeat opportunities.
- Working with our supply chain to provide consistent high-quality solutions at affordable cost.
- Promoting sustainability issues as critical elements in reducing whole-life costs
- Seeking to provide employment opportunities within the communities we operate in, thus providing local work for local people.

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Environmental

The Eric Wright Group is committed to conducting its business in a manner that is both professional and ethical whilst paying particular attention to its environmental responsibilities. We are committed to the delivery of our environmental policy and improving performance throughout the Group. The aims of our environmental policy are to:

- Ensuring as a minimum, compliance with all relevant environmental legislation
- Minimising the risk of pollution from our activities
- The efficient use of materials
- Reduce, reuse, recycle and divert waste from landfill.
- **Reduce our greenhouse gas emissions as low as possible.**

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Environmental Materials Policy

This document outlines the Environmental Materials Policy of the Eric Wright Group and sets out our principles in meeting the companies' objectives to minimise the impact of project works and services on the environment. All manufacturers, materials suppliers and third parties involved in Eric Wright Group supply chains will be expected to provide evidence to demonstrate adherence to the following key policy objectives.

Key Policy Objectives

The Eric Wright Group is committed to:

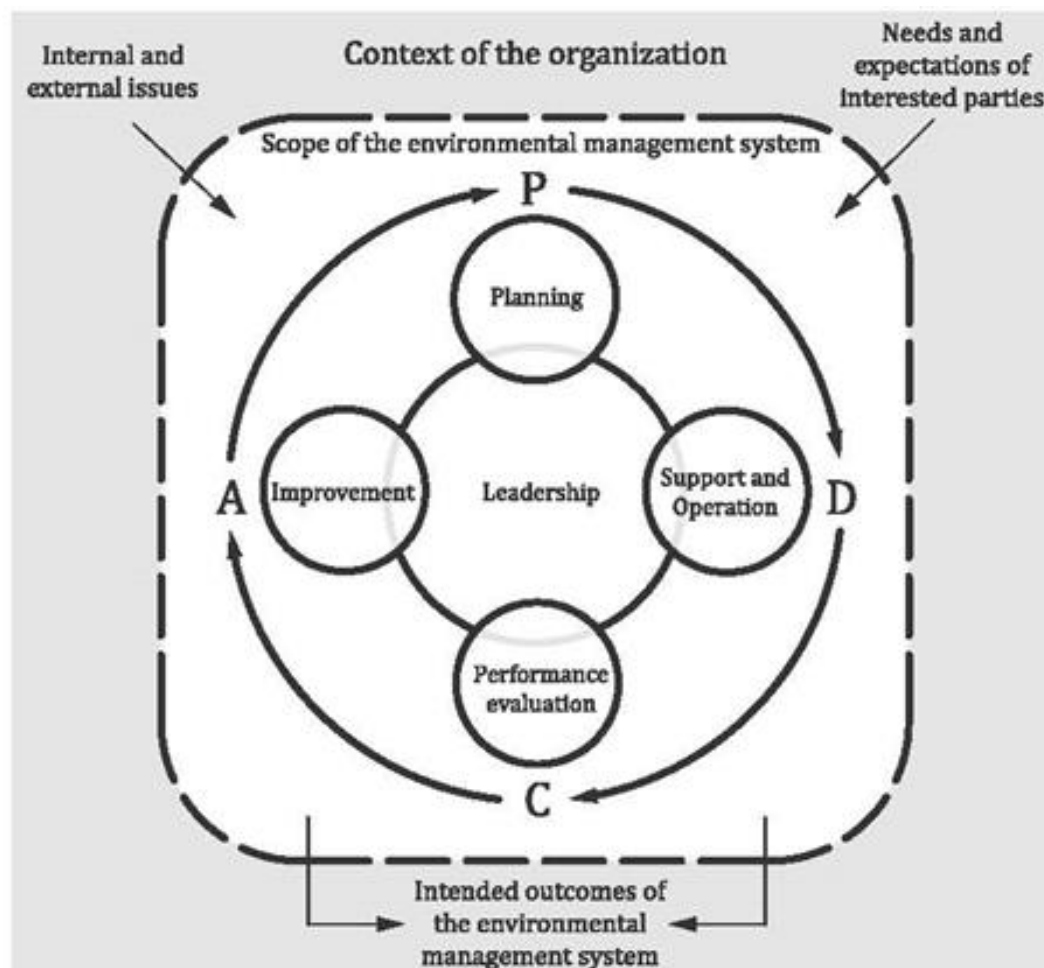
- Using local materials wherever possible
- Specifying and using responsibly sourced materials
- Reusing materials wherever feasible
- Encouraging the use of materials with recycled content and looking to monitor the recycled content of our projects.
- Minimising waste at source and segregating and recycling, where waste production is unavoidable.
- Using non-toxic materials and refrigerants with low global warming potential and ozone depleting properties
- Using materials with a low embodied energy
- Using durable materials
- Working with our supply chain and design teams to help facilitate greater use of environmentally sound materials and to seek continual improvement in this area through improved supply chain integration

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Commitment to Environmental Improvement

The Eric Wright Group is committed to improving its environmental performance through implementation of its environmental management system. This will ensure that Group activities are continually monitored and reviewed. The results of any audits and inspections will be evaluated as part of the management review process.



The Group have established a two tier system to measure, evaluate and report on the environmental performance of its activities.

Inspections will be carried out across all our sites to ensure compliance with regulations and legislation at regular intervals. The records of site inspections are retained at head office and the resulting evaluation reported to the Group board. Inspections focus on:

- Site Set Up
- Waste Duty of Care
- Management of Fuel, Oil and Chemicals
- Site Drainage
- Carbon and Resource Management

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Internal and external auditing will be carried out to ensure compliance with the ISO 14001 standard. All audits will be scheduled and the resulting evaluation reported to Group board.

Audits will focus on:

- Conformity with legal requirements
- Conformity with Group policy and procedure
- Competence training and awareness
- Communication
- Documentation
- Emergency preparedness
- Monitoring, measurement and evaluation

Legal and Other Requirements

The Group is committed to meeting and complying with all legal and statutory requirements.

The Group board, through the environmental department, reviews all relevant environmental legislation using the following services:

- Environment Agency
- ELUS Service

Notification and updates are received via a monthly e-mail service. These are online resources used to identify all new relevant changes to environmental legislation and regulation.

The environmental team review the updates to understand any impact the changes may have on the Group or to any of the business units and report through to Group board.

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Communication

The Eric Wright Group recognises the importance of communication and is committed to ensuring that clear strategies are in place to ensure that employees and stakeholders benefit from this.

Objectives

To ensure information about the Eric Wright Group:

- Is supplied to all employees and stakeholders.
- Delivers a clear strategic message.
- Is continually updated and advises on new legislation including changes in policy and procedure.
- Uses the most effective way of communicating and to seek continual improvement in the way that we communicate.
- Encourages staff participation and suggestions that could be beneficial to our environmental performance.

Recipients

The Eric Wright Group identifies the following as key recipients of important environmental information:

- Employees
- Clients
- Consultants
- Regulatory bodies
- Governing bodies
- Supply chain
- Stakeholder including general public

Techniques

The Eric Wright Group has identified the following mediums as some of the effective channels of communication:

- Eric Wright Group website
- WrightBox
- Newsletters
- SHEQ guidance, bulletins, alerts
- Training/presentations
- Wright People – the Groups LMS system

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Waste Management Policy

The overall aims of the Group are to achieve the avoidance of waste to landfill and to manage waste in ways that protect human health and the environment.

Objectives

- Implementing a long term, sustainable waste management strategy
- Avoiding waste to landfill
- Responsibly handle waste through approved, licenced contractors

The Group board is committed to optimising the handling of waste produced as a result of its activities. This is achieved through a variety of measures, including:

- Implementation of a Site Waste Management Plan (SWMP) for all operational sites in order to monitor and improve waste management. This facilitates the responsible handling of waste.
- Segregation of waste where applicable and relevant.
- Engagement of the supply chain in the identification of sources of waste and working with our supply chain to help drive out waste through the supply chain.
- Monitoring subcontractors to ensure compliance with Eric Wright Group waste management strategies.
- Conducting regular waste audits and tracking the waste that is produced to monitor the total waste recycled by the waste management company.
- Adopting the principles of the waste hierarchy (pictured below) in all Eric Wright Group activities to ensure that waste management is optimised, and disposal of waste is only a last resort once other avenues have been exhausted.



- Using a philosophy of ‘designing out waste’ during the early stages of a project, leading to a reduction of materials and waste production during the course of the project.
- The adoption of ‘Lean’ construction practices means that use of materials on sites is optimised, and less waste is produced.
- Delivering Staff awareness and training to ensure that all staff are up to date with the most relevant issues and practices with regard to waste management activities.

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Procurement Policy

The Group is committed to ensuring its supply chain understands the principles in meeting the objectives of the Group and thus minimising the impact of the Group's activities on the environment.

The Group has developed a strategic process for achieving this.

Materials and Supply chain

Using local materials wherever possible

- Developing a network of local suppliers and manufacturers.
- Designing and specifying local materials in-keeping with the local environment.
- Minimising travel distance from source, to processing, to site through the supply chain.

Specifying and using responsibly sourced materials

- Wherever possible our supplier/manufacturers will be selected preferentially where they operate an ISO 14001 or equivalent accredited Environmental Management System.
- Specifying timber from sustainable and legal sources and ensuring the supplier is FSC. Accredited.
- Designing and specifying materials which are extracted/processed/supplied from a responsible source.
- Maintaining relevant records to confirm that suppliers and materials meet these objectives.

Reusing materials wherever feasible

- Exploring options for the reuse of demolition materials through increasing the use of pre-demolition audits and looking for options to retain material on site, where feasible.
- Where demolition material is produced, crushing and reuse of the inert material will be promoted on-site or off-site if this is not possible.
- Developing agreements with the supply chain to ensure that all materials not used can be returned for restocking/resale.

Using recycled materials and those with recycled content

- Designing and specifying recycled materials and those with a recycled content.
- Crushing inert demolition material for reuse on site or off site. Promoting cut and fill earthworks where possible.
- Specifying recycled aggregates for high grade, sub-base material and filling where possible.

Using non-toxic materials and refrigerants with low global warming potential (GWP) and ozone depleting properties (ODP)

- Designing, specifying and procuring materials which have low or zero ODP and GWP.
- Maintaining records which confirms the content of materials used by the Eric Wright Group and their supply chain.
- Using and specifying natural and non-toxic materials where possible, and using materials with the highest possible Green Guide to Specification rating, Ecopoint or other sustainability metric.

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Using materials with a low embodied energy

- Reviewing the embodied energy of materials as part of the design and specification process and specifying those with the highest possible Green Guide to Specification rating in this regard.

Using durable materials

- Using materials and systems which are designed to provide a durable solution to minimise maintenance and repairs.
- Where required specifying materials with a 25+ year guarantee from the manufacturer.
- Following recognised best practice guidelines in specifying materials and constructing the works.

Supply chain

To ensure that the supply chain is competent to achieve the objectives set out by the Group in minimising its impact on the environment, a rigorous pre-qualification process has been established.

Supply selection takes into consideration performance in the following areas;

- An environmental policy statement is in place.
- An environmental management system is in place (ISO 14001 certified)

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Energy Use Policy

The Group recognise that environmental protection is one of the most important issues facing the world today. Through the continuous commitment of all our staff, the Eric Wright Group is determined to identify potential for increased efficiency, implement waste minimisation, monitor and reduce energy consumption and our consequential emissions of harmful greenhouse gases.

The Group is especially committed to supporting staff in pursuance of the above aims by the process of liaison and consultation in order that they understand the value placed on their active involvement.

Strategic Objectives

- To establish a robust and reliable energy and water consumption monitoring, targeting and reporting system based on accurate meter readings and to embed this system within the management reporting structures of the business.
- To use the above system to:
 1. Set annual targets for reducing consumption.
 2. Target energy and water efficiency investment where the investment will produce the most cost-effective reductions in KPI's.
 3. Monitor the effectiveness of efficiency measures.
 4. Meet legal/regulatory requirements.
- To raise staff awareness of the importance of preventing waste of energy and water, and the actions they can take to assist in preventing waste. Reporting of consumption against target will form part of this awareness campaign.
- To investigate and pilot renewable technologies, new energy efficient devices and measures. Then implement these where it is cost-effective and appropriate through design.
- Evaluate the environmental impact of our activities linked to greenhouse gas emissions.
- Develop a carbon management plan to mitigate our carbon impacts through Group activities and our projects.

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Carbon Management Policy

The essence of the Eric Wright Group Carbon Management Policy is to reduce its climate change impact. In pursuit of this mission, we will comprehensively manage the carbon emissions which result from our activities. We will operate in ways which ensure the resulting emissions are minimised as far as reasonably practicable. The drive to do so will demonstrate the Eric Wright Group culture, structure, systems and strategy. It will guide each of us when we carry out every aspect of our work.

Specific Elements of the Carbon Management Policy

- **Staff awareness and attitudes** – We will ensure our staff understand the importance of carbon management and have the skills and commitment necessary for the implementation of this policy.
- **Organisation** – We will establish job roles with particular responsibility for ensuring that the Eric Wright Group implements its carbon management policy. We will establish a system for on-going monitoring and improvement of our performance.
- **Decision making** – We will ensure that we always take carbon implications into account in all our decision-making activity – at strategic and operational levels. There will be a presumption against any decision with high carbon implications unless there are very strong mitigating grounds.
- **Legislation, regulation & best practice** – We will comply with all relevant legislation and regulation. We will actively pursue understanding of what is best carbon management practice for our activities and seek to set an example for others to follow.
- **Operational activity** – We will carry out our activities to minimise carbon emissions – always seeking improvements.
- **Energy** – We will monitor and take steps to minimise our energy use.
- **Waste** – We will minimise waste by eliminating, reducing, re-using and recycling materials wherever practical.
- **Transport** – We will seek to reduce the travel related carbon impact of our activities. This includes the business travel of our own staff and also visitors to the Eric Wright Group. We accept responsibility for the travel of our staff to and from work and will encourage carbon reduction.
- **Supply chain** – We accept responsibility for all the carbon used in the supply chains providing goods and services which assist us in our work. In all our supply chain decisions, we will give a high weighting to the carbon impact of different options. We will give preference to suppliers who have a strong carbon management policy in place.
- **Clients and partners** – We hope that our mission and the example which we set will encourage all organisations with which we work to implement a carbon management policy. Where the relationship allows, we will actively encourage such developments.

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- **Reporting and communication** – We will make available our carbon footprint information to staff and stakeholders and communicate carbon reductions achieved.

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Risk Assessment and Hazard Identification

The Group recognises that every project is different, and as such, the potential environmental impacts for a particular project are always unique. In order to allow for this, the Eric Wright Group ensures that as part of its environmental management plan, site specific environmental hazard identification and risk assessment is carried out.

Hazard Identification is carried out for:

Sensitive Receptors

- Surface water
- Groundwater
- Protected sites
- Trees
- Hedgerows
- Protected species
- Archaeology

Activities

- Demolition
- Ground treatment
- Ground works
- Vegetation removal
- Re-grading of materials
- Storage of hazardous waste
- Site development

Materials

- Pre-existing materials
- Imported materials

Work methods

- Excavations
- Working adjacent/over water courses
- Drainage
- Earthworks

For all environmental hazards identified during this process, a risk assessment is carried out to identify where the biggest risks lie, and how these risks can be mitigated through the use of method statements.

Where staff or contractors have concerns about environmental hazards or risks, they are encouraged to report this to a member of EWG staff so it can be dealt with and rectified.

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Emergency Preparedness

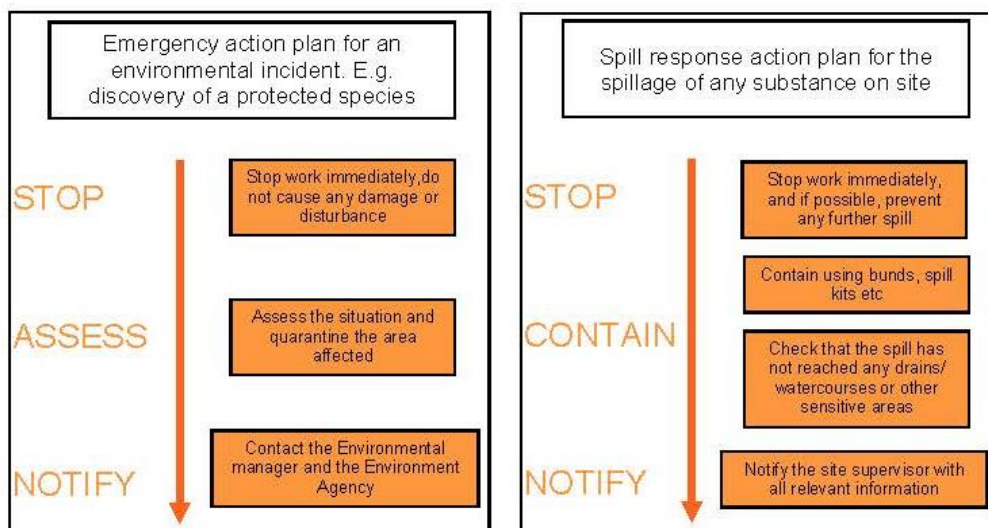
The Group recognises the importance of preserving the environment and as such is committed to ensuring measures and processes are in place to achieve this.

Objectives

- Reducing the risk of environmental pollution
- Reducing the risk of harm to human health
- Preventing the spread of invasive weeds
- Protection of endangered species and habitats

Each operational site across the Group will review and maintain emergency arrangements through the environmental plan.

Spillages are classified as either major or minor. Major spills will be reported to the Environmental manager and the Environment Agency.



Measures

- Spill kits appropriate to the potential spill to be deployed at key locations.
- Emergency response team to be identified in the site-specific environmental plan.
- Use of correct equipment and resources for re-fuelling including RAMS.
- Emergency response procedures displayed and tested.

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