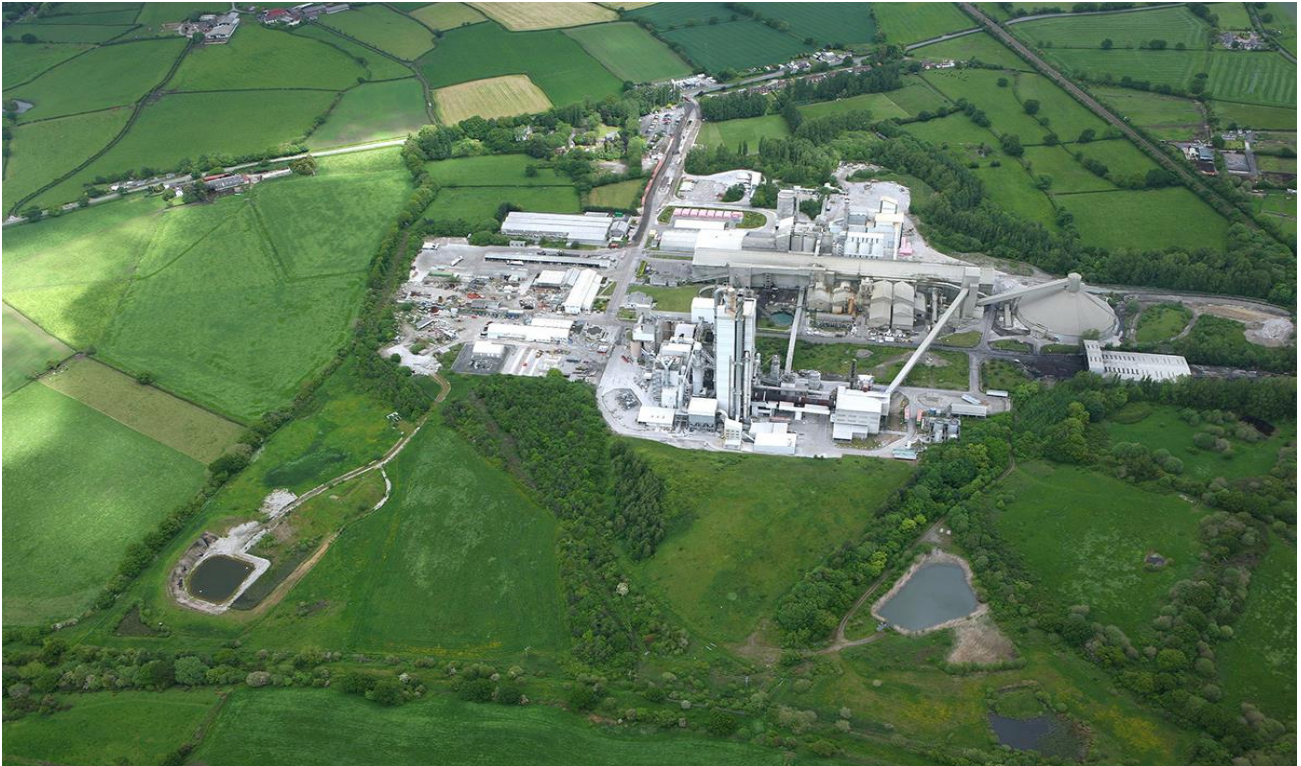


HEIDELBERG MATERIALS

Heidelberg Materials: Padeswood Carbon Capture Plant

Construction Phase Plan

Document no. Rev 0: 215000-00190-000-CM-PLN-00016



21 January 2026

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PROJECT - 21500-00190-000-HS-PLN-00016: Construction Phase Plan							
Rev	Description	Originator	Reviewer	Worley Approver	Revision Date	Customer Approver	Approval Date
Rev A	IDC				23 October 2025		
		GM	CZ	GH			
Rev 0	IFU	DocuSigned by: Graham Middlehurst 048153A1705246A...	Signed by: David Ward 2B5146E3B0FB486...	DocuSigned by: Andrew Bellis 957E55CB1AB642A...	26 January 2026	AS	29 January 2026



Revision History

Rev	Status	Section	Description of Change
A	IFR	All	Issued for Client Review
0	IFU	All	Issued for Use

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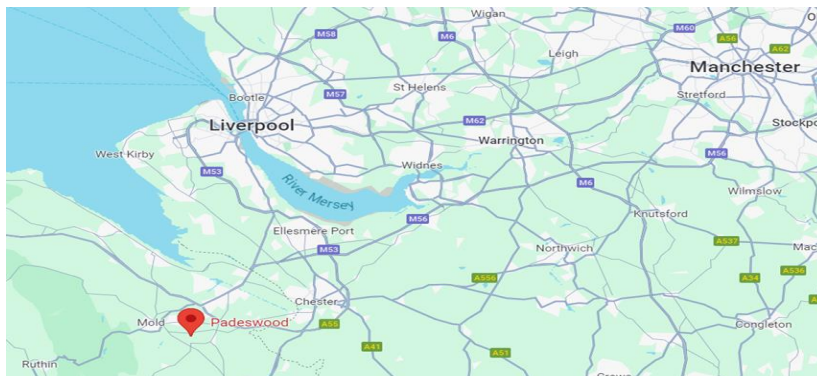
Appendix A. Safety, Health and Wellbeing Policy

Appendix B. Sustainability Policy

1. Project Introduction

The Heidelberg Materials Padeswood Carbon Capture and Storage (CCS) Project forms part of the HyNet Northwest low-carbon industrial cluster. The project will enable carbon capture from the existing cement kiln and a new Combined Heat and Power (CHP) plant, transporting captured CO₂ to offshore storage via the HyNet pipeline network.

Site Location: Padeswood Works, Mold, Flintshire, CH7 4HB



Peak Site Workforce: Approximately 600 personnel

Key Milestones:

- FEED: Q1 2024 – Q1 2025
- Bridging: April 2025 – August 2025
- Phased handover to Worley Ownership commencing 2nd February 2026
- Construction Start: February 2026
- Mechanical Completion: December 2028 - HOLD

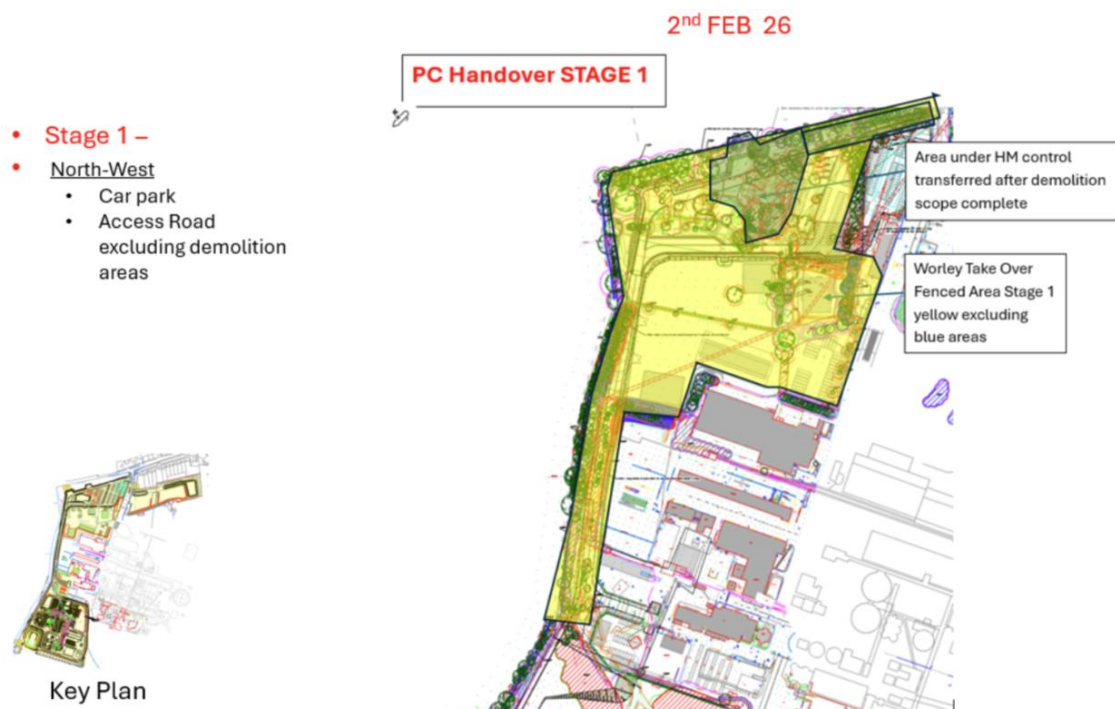
The construction sequence begins with Early Works, which includes site modifications, site clearance, carpark, Laydown and associated drainage and underground services, bulk earthworks, and preparation of haul roads and temporary facilities. Early Works will also include secant piled retaining wall, main cut & fill, including piling mat. Work progresses based on logistics and lead times for major components like the Stack, Absorber, Quench Towers, Regenerator Column, Turbines, Generator, and Boiler.

- The large crane sizes for these components sterilize surrounding areas, so construction progresses outward from the Stack.
- Buildings such as the turbine hall will be made substantially waterproof before equipment installation. Smaller packages like pipe racks, skidded pump sets, and electrical rooms will be pre-assembled where possible to optimize site space and enable parallel work. Utilities

(power and water treatment) will be commissioned early to support hydrotesting and commissioning.

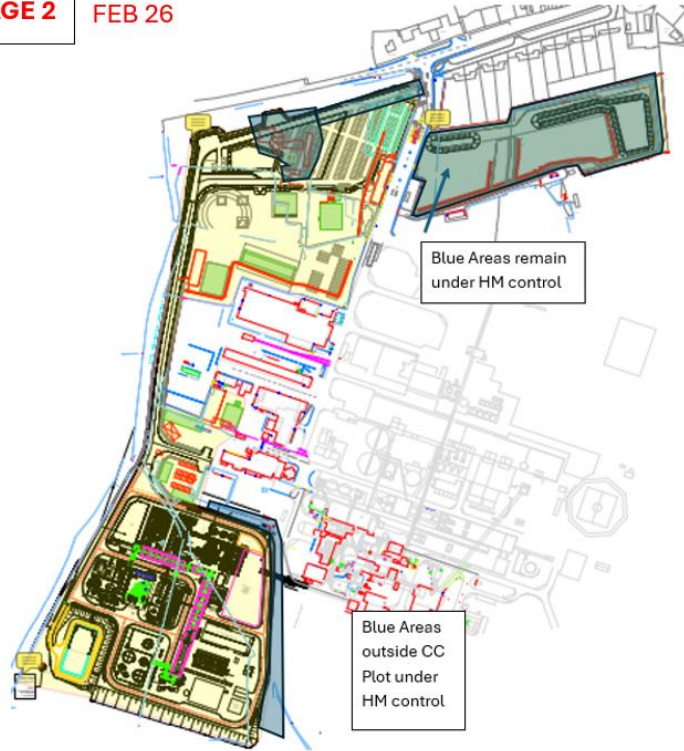
- Piling for major structures will occur sitewide, with foundations progressing east to west. Early focus will be on erecting the Stack, Quench, and Absorber Towers, followed by the CHP and Turbine Hall, with CHP sequence finalized upon vendor input. Site-built tanks in the standalone southern area will progress in parallel.
- The Absorber and Quench Towers will be assembled from prefabricated steel panels, forming sections (approx. 11.5m x 11.5m x 10m high) before being lifted into place to create the 47m-high structures. Adequate craneage and handling space will be maintained for these tall towers.
- The Regenerator Column (5.5m diameter, 46m long) may require piecemeal delivery, site assembly, temporary works, and vendor quality sign-off. The column will need significant space for maneuvering and installation. The AGI area will be used for laydown and craneage ahead of handover to the CO2 Transport and Storage Company (Supplier) .
- Concrete works for the attenuation pond in the south will begin early post cut-and-fill. Cooling towers will be erected by the vendor after completing the civil basin foundation. Flue gas ductwork will be delivered in complete 12m sections and lifted into place. Tie-in will involve damper installation during a plant outage to avoid scheduling conflicts.

The Principal Contractor will assume the responsibility of the CCS site on 2nd February 2026 as a staged approach to ensure alignment and integration of Early Works activity streams. These stages are as follows:



PC Handover STAGE 2 FEB 26

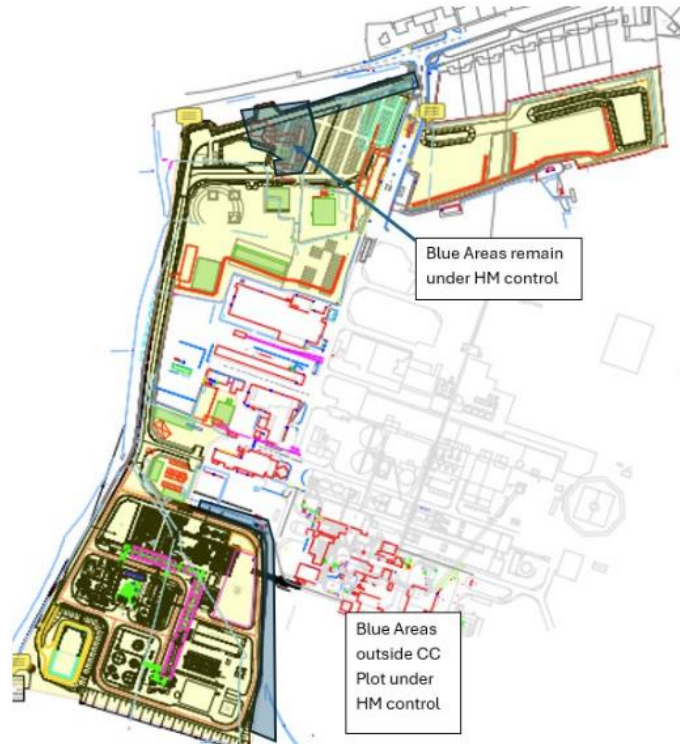
- **Stage 2-** All Western Areas excluding outstanding demolition
 - Phase 1 areas + Main CC plot+ Attenuaton Pond area adjacent to lorry park , excluding demolition areas



PC Handover STAGE 3

MAR 26

- Stage 3-All Areas
Excluding demolition



PC Handover STAGE 4

APRIL 26

- **Stage 4 –**
All areas including previous
demolition areas (demolition
completed)



This Plan details the arrangements specific to the Heidelberg Materials Carbon Capture Plant project and introduces the management strategy and systems which will be employed to control the early site preparatory Works and Construction Execution phases of the project.

As a large-scale EPCm project involving new infrastructure construction, brownfield integration, and interfaces with existing operations, the project presents a complex health and safety risk landscape. These include:

- High-hazard construction methods (deep excavation, heavy lifting, scaffolding)
- Work adjacent to live industrial systems (cement kilns, conveyors, substations, underground HV Cables)
- New hazardous inventories associated with carbon capture and gas handling
- Confined space entry, and temporary works hazards
- Supplier and sub-Supplier workforce coordination on a constrained site
- Site access and security arrangements
- Traffic Management and Plan Pedestrian interfaces

[Type here]



This Plan is a live document, which will be reviewed regularly when additional work scopes dictate and will be updated to include any relevant developments and results of evaluation of its effectiveness, which occur during the execution of the project, e.g. civil, mechanical, commissioning.

The plan will form the basis of HSE plans to be developed by Suppliers whose health and safety plans shall be formatted in such a manner that it can be cross referenced with this document.

1.1 Key Project Contacts

Client: Heidelberg Materials UK (HMUK)

Principal Designer: Worley Europe Ltd (WOR)

Principal Contractor: Worley Europe Ltd (WOR)

Role	Contact Name	Contact Details
HMUK Project Director	Andy Scott	Andy.scott.ext@heidelbergmaterials.com
HMUK HSE Manager	Martin Laverick	Martin.Laverick.ext@heidelbergmaterials.com
WOR Project Director	Andrew Bellis	Andrew.Bellis@worley.com
WOR Principal Designer	Andrew Bellis	Andrew.Bellis@worley.com
Principal Contractor	Andrew Bellis	Andrew.Bellis@worley.com
WOR HSE Manager	Graham Middleditch	Graham.Middleditch@worley.com
WOR Construction Manager	Mick Oxley	Mick.Oxley@worley.com
WOR Construction Director	David Ward	David.Ward@worley.com
WOR Temporary Works Coordinator	Mick Oxley	Mick.Oxley@worley.com

2. Abbreviations, Definitions & References

2.1 Abbreviations

Acronym	Definition
AGI	Above Ground Installation
BS	British Standard
CEMP	Construction Environmental Management Plan
CM	Construction Manager or Construction Management
COSHH	Control of Substances Hazardous to Health
EPCm	Engineering, Procurement and Construction Management
FEED	Front End Engineering Design
GPR	Ground Penetrating Radar
GRP	Glass Reinforced Plastic
HAZCON	Hazards in Construction (review)
HAZOP	Hazards and Operability (study)
HAZID	Hazard Identification (review)
HSE	Health Safety & Environment or Health and Safety Executive
HV	High Voltage
IMS	Incident Management System
ITB	Invitation to Bid
kV	Kilovolt
LEP	Light Eye Protection
LV	Low Voltage
MEWP	Mobile Elevating Work Platform
OEM	Original Equipment Manufacturer
PPE	Personal Protective Equipment
PM	Project Manager
PTW	Permit to Work
RAMS	Risk Assessment & Method Statements
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
SEAL	Safe & Sustainable Engineering for the Asset Lifecycle
SimOps	Simultaneous Operations
TBC	To be confirmed

Table 1 - List of Abbreviations

2.2 Definitions

Term	Definition
CLIENT	Heidelberg Materials
PRINCIPAL CONTRACTOR	Worley Europe Limited
CONSORTIUM	Consortium of Worley Europe Limited and Mitsubishi Heavy Industries Limited (MHI)
LICENSOR	MHI entering a Licensing Agreement with the CLIENT
PROJECT	Padeswood Carbon Capture Plant
SUPPLIER	Company / organisation supplying equipment, materials or services.
SUB-SUPPLIER	The organisation selected by the SUPPLIER/VENDOR/ WORKS CONTRACTOR to supply the part of equipment and services.
WORK	Shall mean all and any of the WORKs and / or services and / or materials required to be provided under the Contract with CLIENT.
Shall and Must	Indicates mandatory requirements
Will	Indicates an action, provision will be implemented in future
Should	Indicates that a provision is not mandatory but recommended as good practice.
May	Used to indicate that optional action is available

Table 2 - List of Definitions

2.3 References

Document Number	Title
215000-00190-CM-PLN-00003	HSE Management Plan, Padeswood Carbon Capture Plant
215000-00190-000-CM-PLN-00006	Pre-Construction Information (PCI)
215000-00190-000-EN-PLN-00002	Waste Management Plan
215000-00190-000-EN-PLN-00003	Construction Environmental Management Plan (CEMP)
215000-00190-000-CM-PRO-00001	Temporary Works Procedure
215000-00190-000-CM-REP-0003	Construction Traffic Management Plan
215000-00190-000-HS-PLN-00020	Emergency Management Plan
215000-00190-000-HS-PLN-00013	Competency and Training Matrix
MS-AS-STD-0031	Event Reporting, Recording and Investigation Standard
215000-00190-000-HS-PLN-00021	Adverse Weather Plan

Table 3 - List of References

3. Management of the Works

3.1 Health and Safety Vision and Policy

Vision: *"Deliver a Safe and Sustainable Project"*

Commitments:

- Injury and Incident free environment
- Full compliance with CDM Regulations, UK Legislation and Worley/Heidelberg Standards
- Deliver Safe & Sustainable construction principles

We can achieve this by working in a collaborative and cooperative manner with our client, Suppliers and other stakeholders by adopting a 'One Team' approach in the management of Health, Safety and Environmental issues.

Details of Worley's HSE Management System for the Project is contained within PEP-02 HSE Management Plan, Padeswood Carbon Capture Plant, Document No:215000-00190-CM-PLN-00003.

3.2 CDM Duty Holders, Roles and Responsibilities

Worley Europe Limited has been appointed by Heidelberg Materials as the Principal Designer and Principal Contractor under CDM 2015 Regulations. The Principal Contractor will manage and coordinate all site health, safety, and environmental aspects through its EPCm management framework and in alignment with the Heidelberg Materials corporate standards.

The Construction Phase Plan establishes clear lines of accountability between the Client, Principal Contractor, Supplier and Sub-Supplier. A clear management structure will be maintained on site, including Project Director, Construction Manager, HSE Manager, Site Supervisors, and Package Managers.

Client duties (HMUK)

The Client will:

- Appoint and resource competent PD and PC
- Ensure suitable pre-construction information is provided
- Allow adequate time and resources for safe delivery
- Ensure H&S file arrangements are in place
- Engage with PD, PC on significant risks and change control

Principal Designer duties (Worley)

The PD will:

- Plan, manage and monitor the pre-construction phase
- Coordinate design to eliminate/reduce risks
- Provide residual risk information to PC
- Ensure designers comply with CDM duties
- Support H&S File compilation

Principal Contractor duties (Worley)

The PC will:

- Plan, manage and monitor construction phase
- Develop, maintain and enforce this CPP
- Provide site inductions, rules and supervision
- Coordinate contractor activities and sequencing
- Ensure welfare and first aid provision
- Manage PTW system inside boundary
- Review and approve RAMS and TW designs
- Ensure workforce consultation and engagement
- Report incidents and HSE performance to Client

Designers' duties (MHI)

All designers will:

- Eliminate/reduce foreseeable risks through design
- Provide information on remaining risks
- Cooperate with PD and PC
- Consider construction, maintenance and demolition phases

Contractors (Supplier) duties

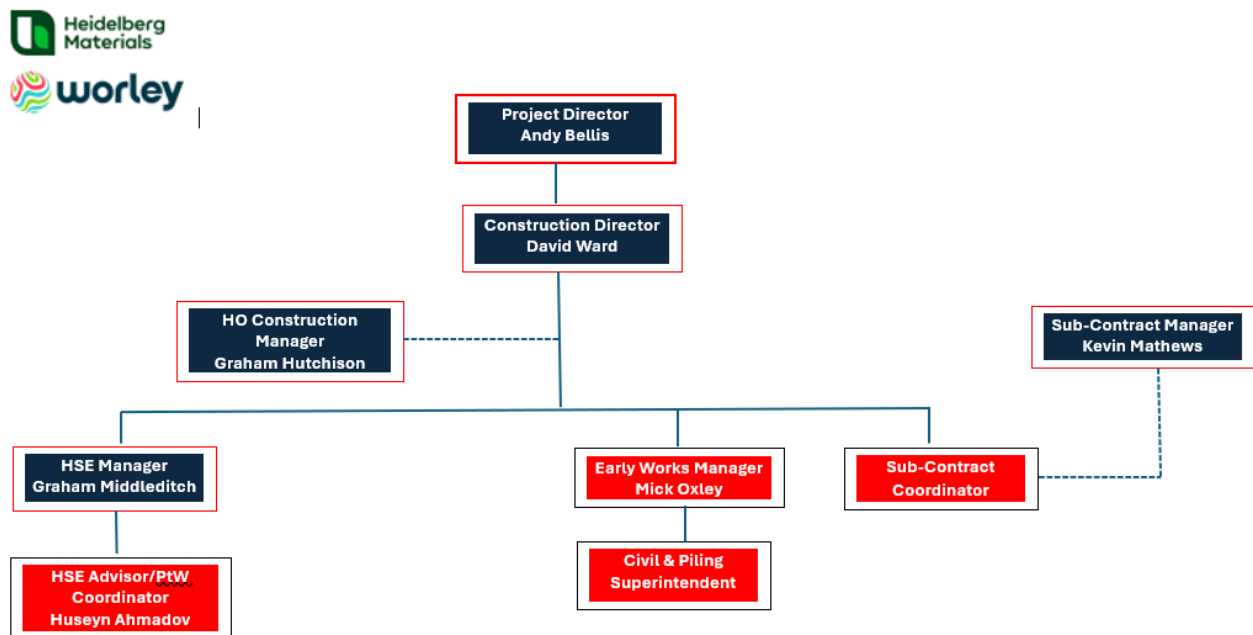
All Suppliers and sub-Suppliers contractors must:

- Plan, manage and monitor their work
- Provide suitable RAMS for approval

- Ensure competence of their workforce
- Comply with site rules and PTW
- Cooperate with PC and other contractors
- Report incidents, close calls, and unsafe conditions immediately
- Provide welfare and supervision appropriate to their scope

Worley Organisational structure

The project organisation chart for early works is:



Key Arrangements:

- Site management structure and responsibilities.
- Supplier interface meetings and coordination.
- Design change management via Aconex & OMIE.
- Daily coordination meetings with operations.
- Arrangements for *temporary works (BS5975 compliant).
- Competence, training, and induction arrangements for all personnel.

* Details of Worley's Temporary Works Procedure the Project is contained within Temporary Works Procedure Document No:215000-00190-000-CM-PRO-00001.

3.3 Cooperation and Coordination

Cooperation and coordination will be actively managed by the Principal Contractor to ensure that all parties discharge their duties under the Construction (Design and Management) Regulations 2015 and that construction activities are planned, communicated and executed in a safe, controlled and environmentally responsible manner.

Formal site coordination meetings will be held weekly with representatives from the Client, Principal Contractor and Suppliers to review programme interfaces, construction sequencing, access arrangements, shared risks, and environmental constraints. These meetings will be supported by daily coordination briefings to review planned activities, permit requirements, changes to site conditions and any emerging health, safety or environmental risks.

The Principal Contractor will establish and maintain effective communication channels to ensure that information relevant to health, safety and environmental management is shared in a timely manner. This includes coordination of simultaneous operations, management of interfaces between Suppliers, and resolution of conflicts that could affect safe delivery of the works.

Design and construction interfaces will be controlled via the project document management system. Supplier Site Managers and Supervisors will be required to closely coordinate and monitor their activities and to have access to competent health, safety and environmental advice. Depending on the size, complexity and risk profile of their scope of work, Suppliers will be required to provide a dedicated HSE professional on site.

Planned monitoring activities will be implemented across all work scopes and will include joint inspections involving the Principal Contractor, Suppliers and the Client. These activities will verify effective implementation of agreed control measures and support continual improvement throughout the construction phase.

3.3.1 Pre-Start Meetings

A pre-start meeting will be held with each Supplier before mobilisation to confirm:

- scope and boundaries
- interfaces and sequencing

- RAMS and ITPs
- permits required
- emergency arrangements
- logistics and welfare
- key hazards and controls
- inspection and reporting requirements

3.3.2 Coordination and SIMOPS

Because multiple packages may overlap, coordination will be managed through:

- Weekly look-ahead planning meetings
- Daily coordination briefings
- Permit planning meetings (as needed)
- Interface risk reviews for overlapping work zones
- Shared lifting/exclusion zone planning
- Agreed traffic and delivery schedules
- Environmental constraint coordination

Daily Setting to Work



3.4 Worker Involvement and Consultation

Worker involvement and consultation will form a fundamental element of the management of health, safety and environmental risks on the Project. The Principal Contractor will ensure that suitable arrangements are in place to engage the workforce in the identification of hazards, development of controls and improvement of working practices.

Workers will be actively encouraged to participate through the following:

- Weekly coordination and safety meetings
- Toolbox talks and pre-start briefings
- Open safety reporting and feedback systems
- HSE forums / Safety Stand Downs
- Behavioural Safety Observations
- Workforce engagement sessions

Feedback from the workforce will be used to inform risk assessments, method statements and site controls, particularly where changing site conditions or interfaces are identified.

Clear mechanisms will be in place to allow workers to raise concerns, report unsafe conditions and suggest improvements. The Principal Contractor will ensure that issues raised are reviewed, responded to and, where necessary, escalated and addressed in a timely manner. Outcomes of consultation will be communicated back to the workforce to demonstrate how input has influenced decision-making and reinforced a positive health, safety and environmental culture.

3.5 SITE INDUCTION

All personnel and visitors must attend a site-specific induction covering as a minimum:

- Project overview and key risks
- Site rules and PPE requirements
- Welfare and emergency arrangements
- Environmental arrangements
- Reporting of incidents and unsafe acts

All personnel carrying out any works within the construction site, including repairs and maintenance to plant and equipment will undergo a full site induction.

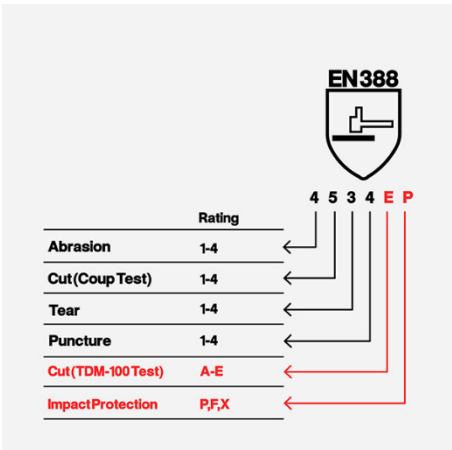
Visitors, including delivery drivers, will attend a Short-Term Visitor Induction and will be escorted at all times whilst on site by a fully inducted member of staff.

Records of all inductions will be recorded and retained by the Principal Contractor onto the project competency management system.

3.6 Personal Protective Equipment (PPE)

PPE must be worn in all construction areas. The minimum mandatory PPE for the project is:

Safety helmets	Safety helmets (to EN397) shall always be worn (with 4-point chin strap where the environment requires it).
Light Eye Protection (Safety glasses)	LEP, to EN166, wrap around or with rigid side shield, shall always be worn when on site, and elsewhere when an eye hazard exists. Dark tinted safety glasses may only be worn subject to approved Risk Assessment and shall not be worn indoors, inside closed structures, or at night.
High visibility clothing	Flame retardant Orange High visibility clothing (to minimum EN11612:2015) shall always be worn in the field. Coveralls with the visibility specified to EN471 will be accepted as a substitute to additional clothing being worn. Trousers / overalls must include reflective strips on lower half of trousers.
Safety boots	Lace up Safety boots (to EN345 Anti-static rated), with ankle support, toe and mid-sole protection shall be worn in all areas of construction, and elsewhere when there is a risk of foot injuries. During early works on Greenfields sites, Safety Wellington Boots (to EN/ISO 2035) may be worn in areas where mud is present. No Riggers boots allowed.
Hearing protection	Hearing protection shall be worn when noise levels exceed 85 decibels (dB) or when normal speech cannot be heard at approx. two metres.
Work gloves	Work gloves appropriate for the hazard shall always be worn in the field and when walking to/from the work faces. Gloves are to be EN388 compliant and offer protection in line with the environments and task at hand. Abrasions, cut, tear & puncture resistance is measured in numbers 1-4. The lower the number the lower the protection is provided.

	The Cut TDM test results are portrayed by letters, A being the lowest protection, F being the highest. Consideration must also be given to the use of impact protection gloves unless risk assessment determines they are not reasonably practicable. 
Coveralls	Long sleeved coveralls, one or two pieces, to mitigate against UV and minor abrasions. Flame retardant / anti-static coveralls must be in line with EN ISO 13688: 2013 & 1149-5 unless risk assessed and approved otherwise.

3.7 SITE RULES

The following rules apply to all personnel, including Principal Contractor suppliers, sub-suppliers, client and visitors while on the Worksite:

- **Permit to Work:**
All works undertaken during Early Works and Construction are done so under the Permit to Work scheme. No permit, No Work.
- **Pre-Start Briefing:**
All work teams must receive an appropriate pre-start briefing for their area of work before any work takes place. No Briefing, No Work.
- **Mobile Phones:**
The use of personal mobile phones is strictly prohibited within construction areas unless specifically authorized for work purposes. Authorised Mobile phone users will be identified by a sticker on the helmet. For all other personnel, mobile phones must be turned off and stored securely in designated non-working zones. Violation of this rule is considered a safety breach.
- **Smoking:**
The site operates a 'No Smoking' Policy. This also includes e-cigarettes and Vapes. Designated smoking areas will be available.
- **Communication Devices:**
Radios will be the only authorized communication method within operational and construction zones. All personnel shall be trained in radio protocol, and radios shall be issued, logged, and maintained by the site logistics team. Any misuse or unauthorized channel usage will be subject to disciplinary action. The security gate will be in radio contact with the site at all times.
- **Attention and Alertness:**
All workers are expected to remain alert, focused, and free from distractions. Activities that reduce situational awareness—such as wearing headphones, texting, or using personal devices—are not permitted in safety-critical areas.
- **Personal Protective Equipment:**
The site standard minimum levels of PPE must be worn in operational / construction areas at all times.
- **Headwear:**
Hoods, hoodies, hats, beanies or any other headwear must not be worn under safety helmets, as they can prevent the helmet from fitting correctly and significantly reduce its ability to protect the wearer in the event of an impact.
- **Mobile Plant and Equipment:**
All mobile plant and equipment, including delivery vehicles must be fitted with flashing beacons and reverse warning signal.

- **Lone Working:**
Lone Working is prohibited on site.

The Company reserves the right to remove any individual from site who fails to comply with these rules. Suppliers shall brief all site personnel on these requirements during induction and reinforce them during toolbox talks and daily briefings.

3.8 Working Hours

Normal construction working hours for the Padeswood Development will be 07:00 and 18:00 Monday to Friday (except Bank Holidays) and 07:00 to 13:00 on Saturdays (the hours defined by British Standard 5228 Code of practice for noise and vibration control on construction and open sites (BSI 2009 as "daytime" hours), with no working on Sundays and Bank Holidays.

This time period includes a staggered start / finish between trades to minimize traffic volumes entering and leaving site.

Construction schedules are based on the standard 48-hour week.

3.9 Short Term Service Employees

The short-term service employee (STSE) process provides for the identification of inexperienced personnel so that the Supplier will provide additional oversight, provide additional assistance and implement additional controls and/or restrictions for activities performed, as deemed appropriate.

The criteria applied by the Supplier to determine a STSE is as follows:

- Length of service within industry will be no greater than 2 years.

The Supplier ensures appropriate processes are in place to manage risks identified with STSE and reports the average ratio of STSE relative to total number of personnel at the work site to Supplier on a monthly basis. All Short-Term Service Employees shall be assigned a mentor, and the Supplier shall ensure:

- Crew sizes ranging from two to nine employees may only contain one Short Service Employee.
- Crews' sizes with ten or more employees cannot contain more than 20% of Short Service Employees.
- A single employee / person "crew" cannot be a Short Service Employee.

STSE shall be clearly identifiable through the wearing of a green colored safety helmet.

4. Control of Specific Site Risks

Significant project risks include working adjacent to live cement plant operations, vehicle movements, heavy lifting operations, sloping terrain, live HV services, deep excavations, and simultaneous operations with existing production assets.

A project-specific Risk Register will be maintained and reviewed regularly. All work activities will be controlled under the Permit to Work systems. Dynamic risk assessments will be undertaken daily via 'Take 5 for Safety' cards prior to commencing work.

The following specific construction activities will be carried out during the Early Works Phase. Each activity has associated risks and control measures as summarized in section 4.1 below.

4.1 Significant Hazards & Mandatory Controls (Early Works)

This section identifies project-specific significant hazards associated with Early Works activities that all Suppliers must address within their Risk Assessments and Method Statements (RAMS).

Suppliers are responsible for identifying hazards associated with their scope of work and for implementing appropriate control measures to eliminate or reduce risk so far as is reasonably practicable. The Principal Contractor retains overall responsibility for ensuring that hazards and control measures identified by Suppliers are suitable, sufficient and effectively implemented across the site.

The Principal Contractor will review Suppliers RAMS to verify that hazards have been adequately identified, control measures are proportionate to the level of risk, and arrangements are in place for supervision, monitoring and emergency response. Where deficiencies are identified, Suppliers will be required to revise and resubmit documentation prior to commencement of works.

The effectiveness of significant hazard controls will be monitored through routine site inspections, audits, coordination meetings and workforce engagement. Control measures will be reviewed where there are changes to scope, sequencing, interfaces or site conditions to ensure continued adequacy throughout the Early Works phase.

4.1.1 Excavations and earthworks

Hazards: collapse, falls, plant interface, buried services, groundwater ingress, asphyxiation, contamination.

Controls:

- permit-to-dig mandatory
- CAT scan & trial holes
- excavation support/benching
- edge protection/barriers
- safe access/egress
- exclusion zones to plant
- daily inspection by competent person
- dewatering plan with discharge controls
- rescue arrangements for deep excavations

4.1.2 Piling and retaining works

Hazards: rig instability, collapse into excavations, noise/vibration, lifting operations, crush zones, concrete burns, overhead lines.

Controls:

- approved piling mat and bearing verification
- rig certification and operator competence
- exclusion zones with banksman & concrete delivery wagons
- lift plans for cages/augers
- noise/vibration monitoring per CEMP
- TW design approval for retaining systems
- overhead line controls and goalposts
- percussion/rotary methods aligned to design

4.1.3 Attenuation pond works / working near water

Hazards: deep excavation, drowning, slope collapse, groundwater surge, plant rollover, silt pollution.

Controls:

- excavation permit and inspection regime
- barriers/fencing to pond perimeter
- controlled access points
- emergency rescue equipment and trained responders
- dewatering plan and pump supervision
- plant stability checks on slopes
- silt control measures (bunds, silt fences, settlement)

4.1.4 33kV and 132kV Cable Pull & Switch Over / Electrical Hazards

Hazards: electrocution, confined space entry, burns, arc flash, manual handling.

Controls:

- permit to work
- isolation confirmation (LOTOTO)
- trained and competent personnel
- mechanical aids for cable pull

4.1.5 Traffic management and vehicle interface

Hazards: collisions, reversing accidents, pedestrian strike, public road interface.

Controls:

- compliance with TMP and delivery booking
- segregated pedestrian walkways
- one-way systems as applicable
- speed limits and signage
- banksmen for reversing/complex manoeuvres
- vehicle checks and driver competence
- wheel wash and road cleanliness controls
- lighting

4.1.6 Lifting operations

Hazards: dropped loads, overturning plant, proximity to services/overhead lines, people under load.

Controls:

- Appointed Person and lift supervisor
- lift plans for all non-routine lifts
- LOLER certification
- exclusion zones
- wind limits
- pre-use checks
- coordination with SIMOPS planning

4.1.7 Temporary works

Hazards: collapse or failure of temporary structures and excavations.

Controls:

- PC Temporary Works Procedure mandatory
- Familiarisation training for Temporary Works systems
- TWC reviews and approvals
- TW design checks
- inspection and permit-to-load/strike
- no deviation without re-approval

4.1.8 Plant and equipment

Hazards: entanglement, crushing, noise, vibration, emissions.

Controls:

- PUWER compliance
- pre-use checks
- maintenance records available on request
- competent operators only
- vibration/noise monitoring where required
- plant-people segregation

4.1.9 Hazardous substances

Hazards: fuel/oil spills, concrete burns, COSHH exposure.

Controls:

- COSHH Register
- COSHH assessments
- bunded storage and Plant nappies
- spill kits and trained users
- designated refuelling areas
- washout controls
- PPE and hygiene

4.1.10 New access road and haul routes

Scope: formation of access road from [A5118 entrance], haul routes, drainage and associated earthworks.

Constraints: public highway interface, existing works, services crossings, dust/noise, limited laydown.

Mandatory controls:

- Speed limits and passing zones
- comply with TMP
- confirm delivery routes and timings
- service locating & dig permits
- dust suppression plan
- traffic marshals at interfaces
- night/low-visibility controls
- local Council consents

4.1.11 Contractor car park

Scope: construction of early works car park for Supplier vehicles incl. drainage and surfacing.

Mandatory controls:

- sequencing with access road formation
- interfaces with laydown and deliveries
- reverse parking and safe pedestrian routes from parking to welfare/works

- service locating prior to excavation

4.1.12 Laydown areas and site establishment

Scope: formation of laydown hardstanding, temporary facilities bases, fencing, security.

Mandatory controls:

- controlled access and segregation
- lifting plans for modular welfare units
- temporary fire plan and muster points during construction
- waste segregation from day 1
- lighting

4.1.13 Bulk earthworks / cut & fill / piling mat

Scope: mass excavation, cut/fill, compaction testing, piling mat formation.

Mandatory controls:

- excavation permits and inspections
- slope stability management
- dump truck routes defined and maintained
- compaction QA aligned to ITP
- dewatering and discharge controls
- dust/noise/vibration controls

4.1.14 Piling and retaining wall works

Scope: secant piled retaining wall and foundations per drawings.

Mandatory controls:

- piling platform certification
- rig rescue plan
- TW approvals
- concrete and rebar handling controls
- noise/vibration monitoring

4.1.15 Attenuation pond

Scope: excavation, profiling, civils and drainage.

Mandatory controls:

- rescue arrangements and fencing
- groundwater/dewatering plan
- runoff and silt control to CEMP
- restricted access with permits
- plant stability on slopes

Each Supplier must provide package RAMS aligned to the hazards in Section 4.1 and any package-specific requirements in this section.

5. Site Operations & Welfare

Welfare facilities are provided in accordance with Schedule 2 of CDM 2015 and include:

- Offices and meeting rooms
- Toilets, showers, lockers, and drying rooms Canteen with hot food provision
- First aid room and medical support
- Adequate parking, pedestrian routes, and muster points

Potable water, hot/cold running water, heating, drying rooms, and sanitary facilities will be maintained at all times. Regular inspections of welfare areas will be conducted by the HSE Manager. Sustainable features include energy-efficient lighting and greywater recycling.

A cleaning and maintenance contract will be in place for welfare facilities.

6. Environmental Management

This section outlines the key environmental management measures to be implemented during construction.

6.1 Key Environmental Sensitivities

Key environmental sensitivities related to the Project comprise the following:

- Residential receptors within 100 – 400 m of the Site (e.g., Padeswood Drive, Dyke Farm, small farm holdings);
- Existing woodlands, scrubs, ditches, and ponds supporting species such as great crested newts and likely low numbers of bats, hedgehogs and badgers)
- A ditch to the West feeds a small stream running along part of the Site's southern boundary which then continues off-site;
- The Site lies within a Coal Authority Consultation Area and includes several Development High Risk Areas;
- Non-designated archaeological features within the site boundary.
- Construction activity noise pollution

6.2 Environmental Management Controls

This section identifies project-specific significant Environmental hazards associated with Early Works activities that all Suppliers must address within their Risk Assessments and Method Statements (RAMS).

Suppliers are responsible for identifying Environmental hazards associated with their scope of work and for implementing appropriate control measures to eliminate or reduce risk so far as is reasonably practicable. The Principal Contractor retains overall responsibility for ensuring that Environmental hazards and control measures identified by Suppliers are suitable, sufficient and effectively implemented across the site.

The Principal Contractor will review Suppliers' RAMS to verify that Environmental hazards have been adequately identified, control measures are proportionate to the level of risk, and arrangements are in place for supervision, monitoring and emergency response. Where deficiencies are identified, Suppliers will be required to revise and resubmit documentation prior to commencement of works.

The effectiveness of significant Environmental hazard controls will be monitored through routine site inspections, audits, coordination meetings and workforce engagement. Control measures

will be reviewed where there are changes to scope, sequencing, interfaces or site conditions to ensure continued adequacy throughout the Early Works phase.

Topic	Key Controls / Mitigation Measures
Fuel Storage Refuelling and Chemical Management	• Apply dust suppression (water bowsters, screens). • Keep haul roads damp and clean. • No burning of waste. • Bunding and spill kits • Monitor visually and adapt measures as needed. • Spill kits • Fuel usage monitoring and recording
Air Quality	• Apply dust suppression (water bowsters, screens). • Keep haul roads damp and clean. • No burning of waste. • Monitor visually and adapt measures as needed.
Light	• Lighting design and specification • Avoidance of skyline lighting • Lighting time restrictions
Noise and Vibration	• Comply with BS 5228 limits. • Adherence to Planning conditions • Restrict working hours. • Use quieter plant and maintain equipment. • Position generators and plant away from receptors.
Water and Drainage	• Implement approved drainage design and silt control measures. • Maintain temporary drainage and settlement systems. • Prevent discharge to watercourses.
Ecology	• Follow ecological method statements and toolbox talks. • Protect known habitats. • Avoid vegetation clearance in bird nesting season unless checked by an ecologist.
Land and Soils	• Strip and store topsoil / subsoil separately. • Use 3 m topsoil bunds and label all stored land and soil • Prevent cross-contamination and soil loss.
Waste and Materials	• Manage waste per the waste hierarchy. • Segregate and record all waste. • Use licensed carriers and keep Duty of Care documentation.
Traffic and Transport	• Use approved HGV routes (A5118). • Manage site access safely. • Minimise HGV movements where possible in Penymynydd due to Primary school • Follow the Construction Traffic Management Plan.
Cultural Heritage	• Identify and protect cultural heritage features. • Report any chance finds to the Client / Archaeological Consultant immediately.
Community and Communications	• Provide notice to neighbours of disruptive works. • HMUK site liaison committee communication process • Maintain a site contact number and complaints log.

Topic	Key Controls / Mitigation Measures
	Respond promptly to community issues.

Details of Worley Environmental Plan for the Project is contained within the Construction Environmental Management Plan (CEMP) [215000-00190-000-EN-PLN-00003]

6.3 Pollution Prevention and Emergency Preparedness

Suppliers are responsible for identifying environmental hazards associated with their activities and for implementing appropriate pollution prevention and emergency preparedness measures relevant to their scope of work.

The Principal Contractor will oversee and coordinate pollution prevention and emergency preparedness arrangements to ensure consistency and effectiveness across the site. This includes review of Suppliers' RAMS and emergency arrangements to confirm that potential environmental impacts have been adequately assessed and that response measures are clear, practical and appropriate.

Environmental controls and emergency preparedness measures will be monitored through inspections, audits and site engagement to verify effective implementation. Emergency procedures will be communicated, understood and reinforced through induction, toolbox talks and drills where required.

Any environmental incidents, near misses or emerging risks will be reviewed to identify lessons learned and to drive continual improvement in pollution prevention and emergency preparedness arrangements.

The following are mandatory:

- Spill kits (for fuels and chemicals) located at all work fronts and refueling areas, inspected weekly;
- Fuel usage monitoring, recording and reporting process
- Trained and competent response team
- Follow the STOP – CONTAIN – NOTIFY procedure for all pollution incidents;
- Secure materials, fuels and waste in advance of adverse weather;
- Stop works during extreme weather conditions;
- Display emergency contact information on all notice boards and welfare areas; and

- All staff will receive environmental induction training and toolbox talks covering pollution prevention, spill response, and incident reporting.
- Bunded storage 110% of volume

7. Monitoring and Reporting

The following Monitoring and Reporting processes shall be implemented and managed by the Principal Contractor:

- Daily site checks and weekly HSE inspections will be carried out by Site manager / Supervisors, HSE Managers and Leads (including Supplier representatives);
- Incident Reporting; Principal Contractor manages event reporting, investigation, and statutory notifications in accordance with the Event Reporting, Recording and Investigation Standard and UK legislative requirements (including RIDDOR) in line with the following process:
 - Near Miss / Minor Incidents – report to the Client (HMUK) within 30 minutes;
 - Major Incidents – immediate verbal notification followed by written report – report to the Client (HMUK) within 30 minutes;
 - Maintain HSE Inspection Log and Non-Conformance Register to be reviewed at regular site meetings;
 - Lessons learnt will be incorporated into updated RAMS and procedures;
 - Planned Audit schedule

8. Training & Competency

All personnel working on the project will be competent to conduct their work without harm to people, assets and the environment. A HSE Competency and Training Matrix document number 215000-00190-000-HS-PLN-00013 will be used by Supplier to record HSE competency requirements for job roles. It will also capture results from competency assessments and identify gaps to be closed. Suppliers Competency and Training Matrix will be shared with Supplier prior to onboarding.

All Principal Contractor, Supplier and sub-Suppliers personnel performing activities or tasks on project sites that require statutory licenses or certificates of competency will submit a current copy to the Company prior to starting work on the site. Records including induction records, trade certificates, licenses to operate plant and equipment, licenses to erect scaffolding, etc. shall be maintained on site.

All personnel engaged to work on the project must undergo a robust screening process based on the criteria defined in the job descriptions and person specifications which includes:

- Confirmation and validation of qualifications through a 3rd party verification service.
- Verification of training records.
- Competency checks.
- Knowledge Test.
- Competency based interviews.
- Technical Test.
- Language testing if appropriate.
- Pre-Employment Health Screening (including Drug & Alcohol screening).

All Suppliers must provide evidence of competence, for example:

- *CSCS cards
- SMSTS/SSSTS for supervisors
- lifting AP/Crane Supervisor/Slinger Signaller
- IPAF
- Scaffolding competence
- excavation and temporary works competence
- first aid trained persons

*Specialist Exemption for short term visitors at the discretion of the Principal Contractor. For example: Person attending site to carry out repairs/maintenance. In such scenarios, the short term visitor would be accompanied at all times by a fully inducted member of staff.

All Project personnel or visitors will undergo a site induction before commencement of work, in accordance with project induction process. As part of the induction process, all personnel will undergo Drug and Alcohol screening prior to issue of site access card.

8.1 Drug and Alcohol Testing

This section defines the arrangements for managing drugs and alcohol on the Project. It ensures that all personnel are fit for work and that risks arising from alcohol or drug misuse are eliminated or reduced to As Low As Reasonably Practicable (ALARP) This is in line with the Principal Contractors Drug and Alcohol Management Procedure document number 215000-00190-000-HS-PRO-00001

The Project operates a zero-tolerance approach to working while impaired by alcohol or drugs. No person shall attend site while under the influence of alcohol or drugs, possess or distribute illegal drugs, or misuse prescription or over-the-counter medication.

Testing Regimes:

- Pre-employment testing is mandatory prior to engagement.
- Induction testing is required before issue of a site ID card.
- Random testing may be conducted at any time on a genuinely random basis.
- For-cause and post-incident testing will be carried out where appropriate.
- Enhanced testing applies to safety-critical roles.

Refusal to submit to testing will result in immediate removal from site.

Confirmed positive results will lead to site access withdrawal and further action in line with contractual and disciplinary procedures.

8.2 Safety Critical Positions

All Safety critical positions shall have clearly defined HSE position requirements and will be subject to:

- Random drug and alcohol testing
- Enhanced Pre-employment medicals and periodic surveillance medicals

Defined safety critical positions include:

- Those in role conducting / managing field work (i.e. team leaders, supervisors, managers etc.)
- Heavy equipment operators include crane and elevated work platform operators
- Riggers, Dogman, Banksman etc.
- Scaffolders
- Electricians
- Permit issuers
- Confined space watchers
- Hot Work Fire Marshals/Wardens
- Flagman

The competency of all nominated personnel employed in safety critical positions shall be reviewed prior to commencement on site.

9. Permitting, Risk Management & Emergency Management

9.1 Permit to Work Systems

A Permit to Work system will be implemented for Early Works which will be detailed within the site induction process. Permit to Work arrangements will be reviewed and detailed for the construction execution phase of the project.

The objectives of the Safe Work Permit system should include, but are not limited to ensuring:

- A safe system of work and all necessary precautions are in place and implemented.
- The proper authorisation is obtained for all work to be performed.
- Substances which endanger personnel and / or the environment are isolated.
- Potential hazards are identified and precautions necessary to minimise any risks are implemented; and
- Conflicting works which may pose a hazard to each other are identified.
- High Voltage Electrical and Live Testing.

PTW is mandatory for all works.

Additional (specific) Permit to Work for high-risk activities, including:

- all excavations and ground penetration
- hot works
- lifting operations (non-routine)
- work at height outside routine low-risk tasks
- confined spaces
- energisation/isolation works
- works near live plant/services
- works near water
- temporary works

9.2 Risk Assessments and Method Statements

Risk Assessment and Method Statements (RAMS) will be produced by suppliers for all site work activities during Early Works, including topographical and geotechnical surveys.

The RAMS shall describe the site areas of all proposed work and any specific activities that have associated risks. Suppliers must submit RAMS a minimum of **15 working days** prior to activity.

All RAMS will be subject to review and acceptance by the Principal Contractor, in consultation with the Client's HSE and Construction teams, to confirm that the proposed arrangements are suitable, sufficient and aligned with project requirements prior to the commencement of works.

All Suppliers shall ensure that all members of the work team are briefed on the RAMS before they commence work and shall obtain signatures to confirm their understanding and acceptance of the controls/restrictions on them.

RAMS must include:

- scope and sequencing
- task hazard assessment
- control measures
- plant/equipment list
- competence requirements
- inspections and hold points
- emergency and rescue arrangements
- environmental controls
- interfaces with other works
- permits required

9.3 Fire Precautions

The Supplier must ensure a Fire Risk Assessment has been carried out for their work locations, which includes an assessment on any occupied building/units they bring to site. Suppliers must also ensure sufficient number of suitable fire extinguishers to deal with potential fire risks on site area available. The fire extinguishers must be positioned in suitable locations around the works are and regularly checked to ensure that they remain operative at all times. Persons required to use fire extinguishers must-have received the necessary practical training.

9.4 Reporting and Investigation Near Misses, Incidents and Accidents

The CLIENT and Principal Contractor have statutory obligations for the reporting of incidents to the regulatory authorities, as required by RIDDOR. Suppliers are responsible for the reporting of notifiable diseases for employees.

All incidents, accidents and near misses occurring at site must be reported to Principal Contractor immediately (within 30 minutes). Incidents reported will be recorded on the Event Notification Form document number MS-AS-FRM-0062 and entered into the Worley Assurance System and notified to the Client.

All incidents will be investigated as per the requirements of the Principal Contractors Event Reporting, Recording and Investigation Standard document number MS-AS-STD-0031. Suppliers shall apply their own investigation process and submit a final report to the Principal Contractor within 7 days after the event /incident arises. If the incident is complex in nature and the investigation is not complete after 7 days, initial findings will be presented pending issue of the final report.

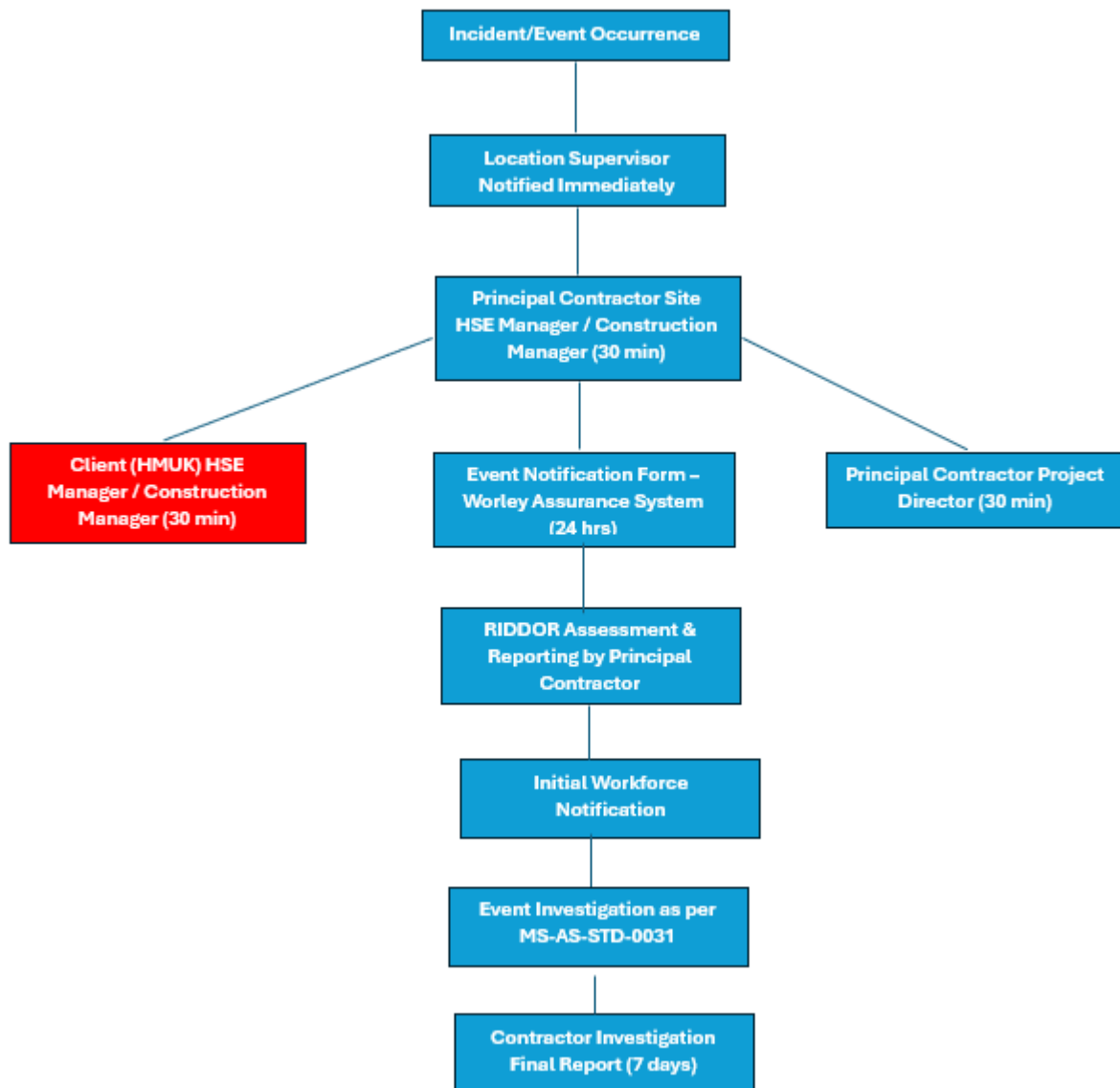
Formal investigations are mandatory for:

- All recordable incidents (LTI, MTC, Property Damage)
- Near Misses with High Potential
- Repeated or systematic unsafe acts
- Regulatory notifiable events (RIDDOR)

Supplier may be required, at Principal Contractors' discretion, to re-investigate incidents. Principal Contractor reserves the right to participate in any investigation with the support of the Client.

Suppliers are required to have available personnel with competency to carry out incident investigations.

Incident / Event Reporting Timeline Flowchart



9.5 Emergency Arrangements

Emergency procedures will be displayed at key locations. The emergency response arrangements will be reviewed as the project progresses and further revised for the construction execution phase of the project.

All personnel will familiarize themselves with the location of the site emergency muster points. Additional muster points may be agreed during the Construction Phase but will be notified to all personnel. Principal Contractors will ensure that the emergency procedures are communicated to Supplier on a regular basis. Emergency Arrangements are part of the induction.

Details of Worley Emergency Management for the Project is contained within the Project Emergency Management Plan [215000-00190-000-HS-PLN-00020]

Key Emergency Principles:

- raise alarm via [site number/radio channel – TBC]
- stop work and make area safe (if safe to do so)
- secure the area
- follow evacuation routes to designated muster points
- do not re-enter until authorised

9.6 Emergency Arrangements - Scenarios

In accordance with the Construction (Design and Management) Regulations 2015 (CDM 2015), all Suppliers and Sub-Suppliers engaged on the Project shall plan, manage, and monitor their work so that it is carried out without risks to health and safety, including during emergency situations.

Each Supplier shall develop, maintain, and implement an Emergency Management / Emergency Response Plan that is aligned with the Project Emergency Management Plan document number 215000-00190-000-HS-PLN-00020 and relevant site rules. Supplier emergency arrangements shall be communicated to their workforce and coordinated with the Principal Contractor's Emergency Control Organisation.

Suppliers are responsible for initiating emergency response within their work areas, including first response actions, scene control, and the recovery and care of injured persons, until formal handover to the Principal Contractor or the Emergency Services. This includes provision of task-specific rescue arrangements where required under RAMS and Permit-to-Work.

10. Site Logistics

10.1 Access and Egress

Construction traffic will access via [A5118 existing entrance]. All drivers must comply with the Construction Traffic Management Plan (215000-000190-000-CM-REP-00003) and follow designated routes.

10.2 Deliveries

All deliveries to site must be planned and communicated to Principal Contractor. A delivery booking system is utilised by Principal Contractor to monitor and track all deliveries to site. The following process must be adhered to by Suppliers and Sub-Suppliers:

- Supplier to notify Principal Contractor of intended delivery. The following information is to be provided:
 - Name of Company
 - Consignment (including consignment number)
 - Vehicle and driver details
 - Estimated time of arrival
- Upon arrival, driver must contact site office. Driver will be escorted to offloading area.
- No unplanned deliveries
- Banksman mandatory for reversing or complex manoeuvres
- Delivery exclusion zones to be maintained
- Delivery exclusion zones to be maintained
- Delivery vehicles must have a fall prevention system installed to prevent falls from the back of wagon during loading/off-loading.

10.3 Laydown and Storage

The Principal Contractor has established Laydown areas within the site boundary to manage the delivery of equipment and plant for construction activities.

All deliveries to site shall be booked in advance and coordinated using a common Delivery Management System (DMS) to minimise congestion, disruption and

emissions. Where practicable deliveries involving HGVs shall be scheduled to avoid typical network peaks with the aims of reducing potential impacts.

Delivery and Offloading activities must be included in Suppliers RAMS.

All RAMS will be subject to review and acceptance by the Principal Contractor, in consultation with the Client's HSE and Construction teams, to confirm that the proposed arrangements are suitable, sufficient and aligned with project requirements prior to the commencement of works.

Regular monitoring and inspections of Laydown areas will be undertaken to ensure methods stated have been implemented.

Suppliers must:

- store materials safely
- segregate fuels/chemicals
- maintain clear routes and fire access
- prevent windblown debris

11. Health and Safety File

The Health & Safety File will be compiled progressively throughout construction. It will contain all relevant information required for future maintenance, alterations, and demolition. The Principal Designer is responsible for ensuring the content is accurate and complete at project handover.

The file will include as-built drawings, specifications, commissioning certificates, residual risk assessments, and maintenance instructions. Heidelberg Materials' Engineering and Operations Teams will review the final file prior to acceptance. A controlled digital version will be archived within the Worley project document management system (Aconex).

Suppliers must provide:

- as-built drawings and test certificates
- residual risk and maintenance information
- product data sheets and warranties
- commissioning and inspection records
- any deviations from design with approvals



Appendix A. Safety, Health and Wellbeing Policy

Safety, Health and Wellbeing Policy

We care about the safety, health and wellbeing of our people.

We are committed to maintaining a physically and psychologically safe, healthy and respectful environment where we look out for and support each other and comply with all applicable laws.

We will:

- Provide our people with the appropriate education, equipment and tools, and facilities and systems required to undertake work safely and without harm to health.
- Ask, listen and respond openly to our people, contractors and customers to ensure their input is included in decisions that impact workplace safety and health.
- Encourage curiosity and learning to identify, assess and manage risks in all we do.
- Promote and implement programs for our people that enable the prevention of physical and psychological harm.
- Take considered and responsible action to drive continual and innovative improvement objectives and outcomes in safety and health performance.

The responsibility for application of this policy rests with us all.

DocuSigned by:



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Chris Ashton

Chief Executive Officer

June 2024



Appendix B. Sustainability Policy

Sustainability Policy

We are driven by a common purpose of delivering a more sustainable world. We support progress toward achieving the UN Sustainable Development Goals and to uphold the principles of the UN Global Compact. To achieve this, we will embed the environmental, social and governance elements of sustainability into the way we operate our business and in the work we do with our customers.

Care for our planet

We commit to sustainable practices, support of the Paris Agreement, and being a leader in our industries. We will:

- Partner with customers committed to driving sustainability; together we decarbonize value chains, steward resources and protect biodiversity.
- Protect the environment and prevent any pollution and degradation resulting from our activities and services through the continual improvement of our environmental performance systems.
- Operate in alignment with our Climate Change Position Statement and the associated strategic actions.
- Assess the environmental impact (such as carbon intensity) of the projects we choose to deliver.

Care for our people and communities

We deeply value the social settings within which we work, and our expectations are clear. We will:

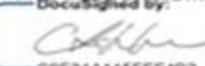
- Provide a respectful, safe and healthy work environment to care for the good health and well-being of our people and their loved ones.
- Commit to the ongoing development of our people through outstanding opportunities to learn.
- Embrace all elements of diversity through our diversity and inclusion policies and networks.
- Support sustainable communities and ecosystems by managing our impacts and making positive contributions.
- Assist our customers to engage with communities to build trust and create mutual benefit from projects.

Operate responsibly

We provide robust business governance and:

- Stand against all forms of modern slavery and corruption.
- Set expectations of ethical behavior, including bribery and corruption prevention, in our Code of Conduct and our Supply Chain Code of Conduct.
- Conduct our business with our customers, partners, agents and suppliers in an open, honest and ethical manner and ensuring our criteria for responsible business practice are met.
- Report our performance transparently.
- Adhere to compliance obligations

The responsibility for application of this policy rests with us all.


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Chris Ashton
Chief Executive Officer
September 2023