

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, that may be affected by Group processes, by implementing controls and mitigation, so far as is reasonably practicable, to minimise its impacts.
- b) Mitigate impact from and ensure resilience of the business to foreseeable impact of environmental change, environmental extremes and legal compliance.
- 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 enable and commit to, continual improvement of environmental protection and enhancement, 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). Taking action if necessary to ensure its effectiveness and compliance with changes in the nature of the Group's operations, structure, legislation, best practice and procedures.

2 Scope of the System

The Company Policy for Environmental Management lays out the commitments and obligations to the environment for all Willmott Dixon Holdings activities. The 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-DR-001.

3 Operation of the Policy

In carrying out this Company Policy for Environmental Management, 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 Offices (LCOs) to ensure that all levels of management carry out their duties.
- b) Ensure that the managerial responsibility and accountability of its employees for environmental protection and enhancement, is specified in writing.
- c) Ensure competency, through provision of discipline specific and appropriate environmental training, and inclusion of environmental protection and enhancement in all relevant learning development programmes.
- d) Sustain awareness of the need to prevent environmental incidents in the minds of all employees. Investigate and ensure learning from all incidents/non-conformances.
- e) Assess Environmental Aspects & Impacts, when planning its work, and identify practices and methods, which may help to eliminate pollution and waste, as well as to be efficient in the use of materials and resources.
- f) Plan and implement appropriate incident prevention and environmental emergency response arrangements at the workplace and maintain liaison with all employers who have employees working at the same workplace.
- g) Encourage the discussion of environmental matters at all levels, including arrangements for worker engagement and joint consultations with employees.
- h) Prepare, discuss, agree, and review the Company Policy for Environment, as considered necessary.
- i) Monitor performance and trends through the Annual Management Review to set objectives, for continued improvement. Ensure that this Policy is applied to all contracts.

4 **Organisation of the Policy**

- a) The responsibility for all matters related to the environment within the Willmott Dixon Group rests with the Chief Sustainability and Compliance Officer 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-DR-001).

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 activities to protect the environment and mitigate impact from their work.
 - o promote practices that will reduce risk.
 - o consider environmental conditions that may affect project delivery.
 - o plan to deliver objectives that secure performance with continued improvement.
- b) The appointed SHE Inspectors will complete second party audits to inspect, monitor, and report on the effectiveness of the Policy for the Environment and EMS for all LCOs and will, where necessary to 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 Company Policy for the Environment and EMS in detail in all LCOs. GEM will, where necessary to enforce the Policy, to impose fines and/or prohibition notices.
- d) Management review of the policy and performance, as well as continued improvement of the system, will be made by the Holdings Board. Cascade of performance action and required continual improvements will be led by the directors responsible for environmental management.



Julia Barrett
Chief Sustainability and Compliance Officer

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-DR-001 Organisation Matrix – Sustainability and Compliance**