

## Environmental Policy Document





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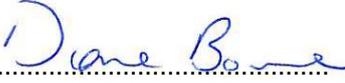
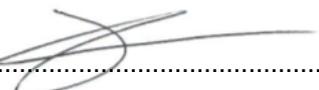
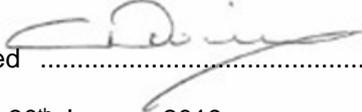
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## Introduction

The following policy statements aim to establish the Group Boards commitment to the strategic Environmental management of the Group Companies for their key statutory and corporate responsibilities.

<b>Jeremy Hartley</b> <b>Managing Director</b> <b>Eric Wright Group</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>ERIC WRIGHT</b> GROUP
<b>John Wilson</b> <b>Managing Director</b> <b>Eric Wright Construction</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>ERIC WRIGHT</b> CONSTRUCTION <small>PART OF THE ERIC WRIGHT GROUP</small>
<b>Diane Bourne</b> <b>Managing Director</b> <b>Eric Wright Civil Engineering</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>ERIC WRIGHT</b> CIVIL ENGINEERING <small>PART OF THE ERIC WRIGHT GROUP</small>
<b>Neal Whittle</b> <b>Managing Director</b> <b>Eric Wright Water</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>ERIC WRIGHT</b> WATER <small>PART OF THE ERIC WRIGHT GROUP</small>
<b>George Lilley</b> <b>Eric Wright Facilities Management</b>	Signed .....  Date: 2 <sup>nd</sup> September 2019	 <b>ERIC WRIGHT</b> FACILITIES MANAGEMENT <small>PART OF THE ERIC WRIGHT GROUP</small>
<b>Karen Hirst</b> <b>Managing Director</b> <b>Maple Grove Developments</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>MAPLE GROVE</b> DEVELOPMENTS <small>PART OF THE ERIC WRIGHT GROUP</small>
<b>Christine Winstanley</b> <b>Managing Director</b> <b>Eric Wright Health and Care</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 <b>ERIC WRIGHT</b> HEALTH AND CARE
<b>Colin Hetherington</b> <b>Managing Director</b> <b>Appleshwaite</b>	Signed .....  Date: 30 <sup>th</sup> January 2019	 appleshwaite

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## Environmental Policy Statement

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

We believe that effective environmental management results from a combined team effort and systematic approach which 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;

- Compliance with all relevant environmental legislation.
- Identification and management of environmental risks and hazards and prevent pollution to land, air & water.
- Protecting biodiversity and ecosystems, and where possible, enhancing the natural environment.
- Reduction of emissions to air resulting from our activities (Greenhouse Gases, dust, transport).
- Ensure the efficient use of natural resources through waste elimination, minimisation and resource efficiency and where waste production is unavoidable, implement practices to divert waste from landfill, where practicable.
- Encourage the use of sustainable construction principles and raise awareness of these through provision of advice to our clients and subcontractors.
- Liaise with local communities and businesses so that contact can be made at the earliest opportunity to minimise statutory and non-statutory disturbance and social impact.
- Promote the co-operation of all our employees through training, consultation and awareness raising.
- Monitor our environmental performance and use this as a basis for continual improvement.
- Encourage our subcontractors and suppliers to utilise sound environmental practices and sustainable resources.

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

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## Sustainability

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 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 to 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
- Create training and job opportunities in those communities where we work.
- Encourage and facilitate a positive work-life balance.
- Continue with our aim of providing high standards of health and safety performance on all our projects and work to reduce accident rates.

### Economic

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

- Building relationships with our clients that maximise project value, minimise cost and seek out repeat opportunities.
- Work with our supply chain to provide consistent high-quality solutions at affordable cost.
- Promote 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.

### 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:

- Ensure as a minimum compliance with all relevant environmental legislation
- Minimising the risk of pollution from our activities
- The efficient use of materials
- Reducing waste and diversion from landfill

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## Corporate Social Responsibility

The Group recognises the social and environmental implication of its activities and believes in conducting its business in a responsible manner.

The Group has remained a private company and this has enabled it to adopt a long term strategy with regard to its growth as a company, but also to implement its belief that there is more involved in the operation of a company than simply the creation of wealth for the few. The philosophy of developing long term relationships both within the Group amongst its employees and with the external environment, amongst its clients and stakeholders, ultimately leads to a more rounded approach to business and its effect on the community and the individuals associated with it.

Our corporate responsibility programme is developed and driven by the board as a strategic business discipline. It is focused on our core business objectives of building long term relationships with our employees, customers, suppliers and the wider community.

Our corporate responsibility programme covers the management principles in the following key areas:

- Environment
- Health, safety and well-being
- People

We are committed to:

- Managing our business ethically and with integrity.
- Be fully legally compliant in all that we do.
- Provide a rewarding fulfilling career for all our employees.
- Continue to develop the Eric Wright Learning Foundation providing training and development for learners age 14 upwards.
- Supporting the Eric Wright Trust in the delivery of its chosen charitable objectives.
- Continue to actively support our local community
- Actively assess and manage our impact on the environment
- Continually benchmark our performance in all areas and review opportunities to improve

We believe that a corporate social responsibility programme should be flexible to allow continuous development to meet the changing needs of both the business community and the wider industry.

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## Environmental Materials

This document outlines the Environmental Materials Policy of 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. Where this is not feasible, Eric Wright Group will require a written explanation setting out reasons why this is so.

### Key Policy Objectives

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. Regular inspections will be completed to ensure compliance at all times. The records of site inspections are retained at head office and the resulting evaluation reported on to the Group board. Inspections focus on:

- Documentation and records
- Waste management
- Oil and fuel storage
- Site drainage
- Statutory nuisance
- Utility consumption

Internal and external auditing will be carried out to ensure compliance with the ISO14001 standard. All audits will be scheduled and the resulting evaluation reported on to Group board.

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Audits will focus on:

- Conformity with legal and other requirements
- 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 site support department reviews all relevant environmental legislation using the following services:

- Environment Agency
- New Ground 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 management review meeting attendees ensure that the environmental aspects identified are understood in terms of relevant legislation.

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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.

## Recipients

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

- Employees
- Clients
- Consultants
- Regulatory bodies
- Subcontractors
- 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
- Wrightway
- Quarterly news letter
- SHEQ guidance, Bulletins, Alerts
- Training/Presentations

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## Waste Management

The overall aims of Group are ultimately to achieve the avoidance of unnecessary 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
- Minimise waste to landfill
- Responsible handling of waste

The Group board is committed 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 Environmental Management Plan (SEMP) for all construction 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 suppliers 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.
- Development of a partnership with a specialist waste management company enables a long-term strategic approach to be taken, leading to improved performance. It also means that we can confidently ensure that all legal requirements with regard to duty of care are met and that in disposing of waste, activities conform to environmental and health and safety legislation.
- The adoption of the principles of the waste hierarchy (pictured below) in all Eric Wright Group activities ensures that waste management is optimised and that 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 leads to a reduction of materials and waste produced 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.
- Staff awareness training will ensure that all staff are up to date with the most relevant issues are practices with regard to waste management activities

## Procurement

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The Group is committed to ensuring its supply chain understands the principles in meeting the objectives of the Group and to minimise 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 ISO14001 or equivalent accredited Environmental Management System
- Specifying timber from sustainable and legal sources and ensure 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 and ozone depleting properties

- Designing and specifying and procuring materials which have low or zero ODP and GWP.
- Maintaining records which confirms the content of materials used by Eric Wright Group and subcontractors
- 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.

## Subcontractors

To ensure that the subcontractor 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.

Subcontractor 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

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 reduction in 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

The essence of the Eric Wright Group Carbon Management Policy is to reduce its climate change impact. In pursuance 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 practise 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 chains** – 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 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.
- **Reporting and communication** – We will make available our carbon footprint information to staff and stakeholders and communicate carbon reductions achieved by implementing a Carbon Management Action Plan.

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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.

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## Emergency Preparedness

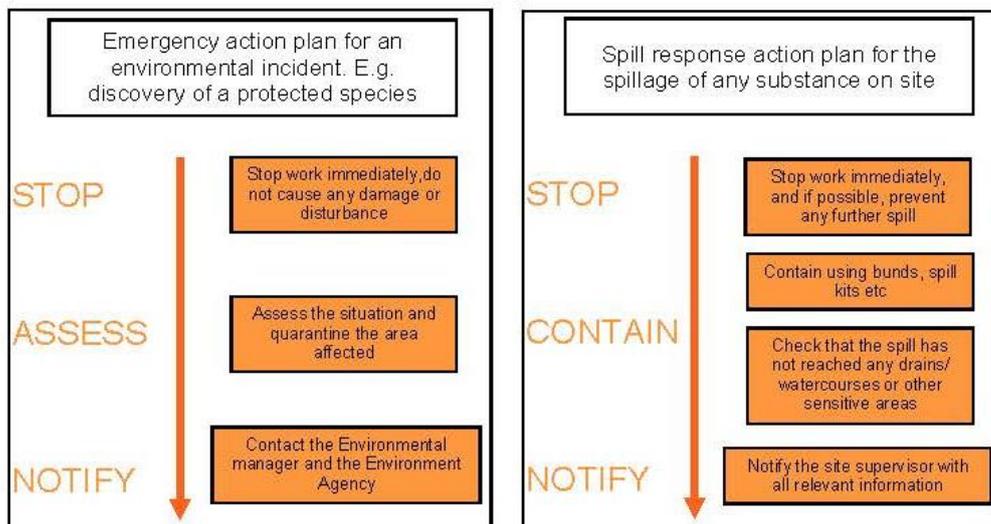
The Group recognises the importance of preserving the environment and as such is committed to ensuring measures and processes are in place to achieve this.

### Objective

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

The effect of any leak, spillage or pollution incident can be minimised by having effective emergency response controls in place. Therefore each operational site across the Group must review and maintain emergency arrangements through the environmental plan.

Spillages are classified as either major or minor. Major spills are immediately 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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## Fleet Policy

As part of the overall commitment to reduce its environmental impact, the Group endeavours to promote a more efficient and greener fleet. Specific consideration is given to the following areas to demonstrate the benefits to the organisation and staff vehicle users.

- Regularly servicing the vehicles to reduce emissions and fuel consumption.
- Promote safe, economic, and environmentally friendly driver training.
- Effective rental through approved suppliers.
- Specification level
- Purchase of vehicles with low CO2 emissions
- Capturing and analysing data on fuel consumption to promote improved MPG
- Whole Life Cost
- Encourage car sharing
- Use of video – conferencing/ public transport, where appropriate
- Setting limits on the emissions rating for cars available through the “grey” company car scheme.

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