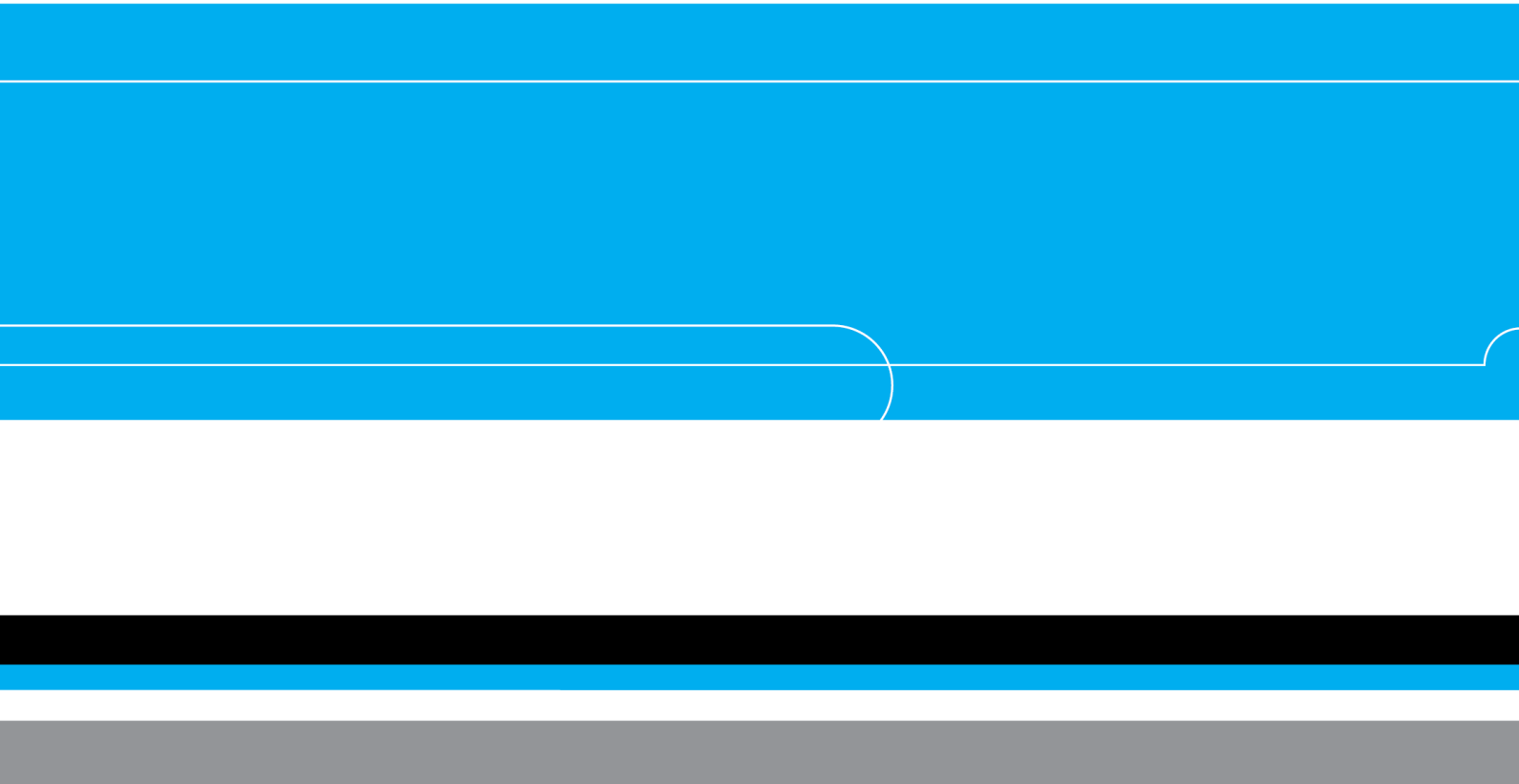


Environmental Policy and Practice

April 2024



ENVIRONMENTAL POLICY STATEMENT

VolkerStevin Infrastructure Limited (VSI), t/a VolkerStevin and t/a VolkerInfra, is a major construction and engineering company operating in the United Kingdom and internationally providing complex engineering solutions across a wide range of sectors including:

- Civil engineering land remediation and regeneration
- Water and environment
- Defence and marine infrastructure
- Flood and coastal protection
- Design, installation and maintenance of cable infrastructure onshore and offshore
- Horizontal directional drilling

VolkerStevin Specialist Businesses (VSSB), t/a VolkerGround Engineering, t/a VolkerMarine Services and t/a VolkerSite Services provides the following tailored focused services:

- Piling and foundation engineering solutions
- Hire and installation of accommodation
- Hire and sale of pontoons

We operate under a fully established Integrated Management System (IMS) to BS EN ISO 14001:2015 which provides clear guidelines on how we manage environmental impacts throughout VolkerStevin.

We are committed to maintaining high standards throughout our operations, with particular regard to minimising the adverse environmental impacts of all company operations.

VolkerStevin will strive to continually improve our environmental performance through the reduction and control of waste, reusing and recycling of materials, prevention of pollution, protection of local environmentally sensitive locations, and conserving natural resources and minimising energy consumption.

Specifically, we are committed to:

- Maintaining an Integrated Management System compliant with the requirements of BS EN ISO 14001:2015 and implementing this IMS throughout our project activities and fixed office locations
- Maintaining certification against recognised Chain of Custody schemes for the purchase and use of responsibly sourced timber
- Complying with relevant environmental legislation, corporate and other requirements to which VolkerStevin subscribes, e.g. client environmental requirements, Considerate Constructors Scheme, construction codes of practice, or trade associations
- Establishing and reviewing quantifiable environmental objectives and targets according to the nature of our activities, business and other legal requirements. These include sustainable procurement and the reduction of resources such as waste, water, energy consumption and carbon. Objectives and targets will be reviewed annually
- Developing site-specific Environmental Management Plans as part of our Site Management Plan (SMP) to mitigate adverse environmental impacts such as pollution, noise, dust, odour, waste and emergency situations, and taking into consideration local community concerns and the control of hazardous substances
- Wherever possible influencing project design by offering solutions to reduce environmental impact
- Introducing methods of reduction, reuse and opting for recycled or sustainably procured products
- Minimising the adverse impacts of our operations on local communities, wherever we have an influence
- Protecting the environment by considering climate change and doing what we can through mitigation, adaptation, and protection of biodiversity and ecosystems
- Working with our clients, suppliers, subcontractors, our own employees and other stakeholders to improve all parties' environmental performance
- Providing appropriate environmental information and guidance to employees and others working on behalf of VolkerStevin, as well as leading in the creation and adoption of best practices

All employees and others working for VSI or VSSB are required to comply with this policy, to ensure they cooperate and carry out activities in a responsible manner. It is the responsibility of VolkerStevin management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerStevin, and then brought to the attention of all employees. It is accessible to interested parties via the individual Volker company website, reception areas or is available on request.

John Cox
Managing Director

April 2024

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1 CONTEXT OF ORGANISATION

VolkerStevin Infrastructure Limited (VSI), incorporating VolkerInfra, is a multi-disciplinary contractor with a reputation for innovative engineering in the civil engineering, land remediation and regeneration, water and marine infrastructure, flood and coastal protection, HV design and installation. VolkerStevin Specialist Businesses Limited (VSSB) provides specialist services for piling solutions, accommodation hire and installation and pontoon sale and hire. Our customer focussed culture empowers our experienced employees to find project solutions which meet the expectations of all interested parties.

The reference to VolkerStevin within this policy includes VSI and VSSB.

As part of one of the largest construction groups in Europe, VolkerWessels, we have access to the technical resources and innovations of companies working throughout the world. This includes our 5 sister companies in the UK with whom we form VolkerWessels UK (VW UK). Together we share best practice and skills, harness talent, improve delivery to clients and support the continued growth of the group in the UK.

VolkerStevin's registered office is Hertford Road, Hoddesdon, Hertfordshire EN11 9BX.

The construction industry is a major user of the earth's resources and produces vast quantities of construction and demolition waste. It affects the environment in which we will live and work. The road, building, rail and other infrastructure projects we construct become part of the landscape, making us responsible for their environmental impacts.

VolkerStevin fully support the aims and objectives of environmental statutory provisions and will cooperate fully with the requirements of the relevant environmental regulatory and enforcing bodies.

The company aims stated in this document are to secure, so far as is reasonably practicable, the environmental wellbeing of employees and others, including the general public, who may be affected by our operations.

Formal amendment to this document is the responsibility of the Director of HSEQS with the approval of the VolkerStevin board of directors.

This document serves as a cross-reference between the requirements of BS EN ISO 14001:2015, and other environmental documentation in use such as the company procedures and details contained within respective Site Management Plans.

2 PURPOSE

The purpose of this document is to outline the Environmental Management System (EMS) operated by VolkerStevin, which is based on the requirements of BS EN ISO 14001:2015. The EMS is complementary to our Quality and Health & Safety Management Systems.

This document describes the arrangements in place to put into practical effect the commitment made in the Environmental Policy Statement. It outlines the Integrated Management System (IMS) operated by VolkerStevin. This Environmental Policy is applicable to all VolkerStevin offices and operational facilities.

It shall be made available to all employees and any other interested parties. Staff appointed responsible for the management and implementation of VolkerStevin's Environmental Policy will ensure that a copy is displayed in a prominent position at all VolkerStevin temporary and permanent offices.

3 SCOPE

The company's Environmental Policy is applicable to all projects, offices and operational facilities,

This policy and associated processes will assist each individual and organisation we work with to understand the environmental considerations that may influence them in:

- Sound working practices, especially in preventing pollution and ensuring proper waste management
- Operating procedures designed to encourage waste minimisation and the re-use of materials
- Standards of handling and storage of construction materials, particularly those of a toxic nature or containing hazardous substances
- Consideration of the carbon footprint of activities and materials
- Creation, measurement and reporting of social value
- Selection of recycled and recyclable materials and use of sustainable resources

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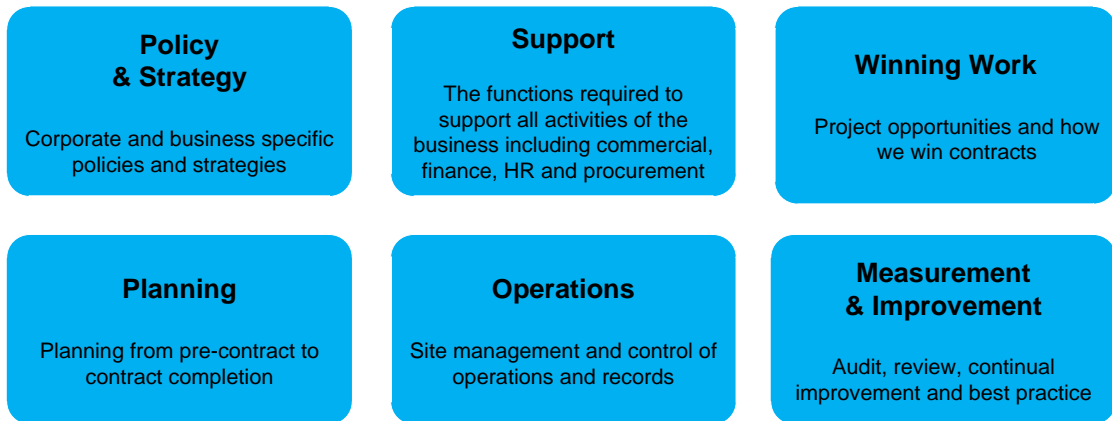
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4 IMS STRUCTURE

The Integrated Management System (IMS) is a structured framework used to establish VolkerStevin’s structure, roles and responsibilities, planning, operation, policies, practice, rules, objectives and processes to ensure our overall objectives, as set out in our Environmental Policy, are implemented and achieved throughout the organisation. Where referenced within this document IMS relates to environmental management.

The IMS includes a number of environmental processes and procedures that are fundamental to the requirements of our business. The IMS is structured in the following format:



5 ORGANISATION AND ARRANGEMENT

Arrangements for implementation of the Policy

These requirements and our management controls including emergency requirements are detailed within a specific Site Management Plan (SMP) prepared for each project and our fixed operational locations. The SMP shall assign responsibility to relevant parties to ensure these policy and practice requirements are met. These include requirements identified in documents produced by the client or their representative, together with documented company management procedures, which ensure compliance with legislation, regulations and codes of practice relevant to the environment.

Impact Assessment

Aspects of our activities which have an impact on the environment or local communities shall be identified and assessed, and we shall endeavour to mitigate adverse effects.

Sustainability Strategy

This Policy should be read in conjunction with the VW UK Sustainability Strategy, which sets the strategic direction for the business against a range of themes with measures and targets.

Work Methods

Operations with the potential for environmental impacts shall be carried out in accordance with detailed method statements, company procedures and details identified within SMP, together with relevant codes of practice produced by statutory / regulatory bodies.

Community Relations

We will inform appropriate parties of how and when our operations will affect them, through public meetings, notices, and signage or by verbal or written means.

VolkerStevin is a Partner member of The Considerate Constructors Scheme (CCS). As such all projects (acting in the Principal Contractor role) over six weeks duration will be registered with CCS and abide by the CCS code of considerate practice.

Project performance against these criteria will be evaluated by an independent assessment by the CCS.

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5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Training

Training requirements are identified through Personal Development Reviews or requested by individuals responsible for an activity.

Responsibility for Environmental Management

ISO 14001 uses the term ‘top management’ to identify a number of key responsibilities with regard to environmental management. The roles that fall within VolkerStevin’s ‘top management’ for the environment are shown below.

- Managing Director
- Regional / Contracts Directors
- Commercial Director
- Director of Health, Safety, Environment, Quality and Sustainability (HSEQS)
- Head of Sustainability
- Environmental Managers / Advisors
- VolkerWessels UK Corporate Responsibility Director (CR)

Top Management

Within VolkerStevin, top management demonstrate leadership and commitment to the IMS by taking on responsibilities for environment that include:

- Developing the Environmental Policy and objectives for VolkerStevin, and ensuring that the correct organisational structure and resources are in place to support these goals
- Promoting the policy and objectives to employees to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall environmental objectives
- Ensuring our focus is on client requirements
- Ensuring the IMS is implemented to meet the needs of VolkerStevin, its clients and other interested parties
- Reviewing the IMS and identifying ways in which to improve it

Environmental Management Roles - competence, support, impartially and independence

For the purposes of clarification under BS EN ISO 14001:2015, environmental management is not outsourced. Competent environmental management professionals are employed with the necessary skills, knowledge and experience, as detailed within job descriptions and vacancies (when applicable).

Dedicated environmental managers and advisers are directly employed within VolkerStevin. Their line management reporting lines are outside those of operational delivery teams, and thus maintain the ability to perform their roles with independence and impartially, and the full support of the organisation. Their competence is reviewed on a regular basis including, but not limited to, Development Performance Reviews (DPRs).

The VW UK CR Director, in reporting to the CEO, retains overall responsibility for the integrated management system (IMS) and oversight of environmental management on behalf of the VW UK board.

The VW UK Director retains impartiality in their remit and extends this impartiality to all employees in dedicated environmental management roles, to ensure they are facilitating the achievement of environmental management requirements. The VW UK CR Director’s responsibilities include a duty to support dedicated environmental management employees in the achievement of their own responsibilities, and will report any shortfalls to the VW UK board as a minimum.

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5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Managing Director (MD)

- Board of Directors' representative for environmental management
- Ultimately responsible for the company's IMS
- Has overall responsibility for the operations of VolkerStevin
- Develops long-term strategy for the business
- Ultimately responsible for environmental issues, and together with the VW UK CR Director ensures that the company objectives and system are developed, implemented and managed to a beneficial conclusion
- Sets realistic goals for the continual improvement of environmental management

Project / Contracts / Business Directors (accountable to MD)

It is the responsibility of these Directors to:

- Ensure the environmentally safe delivery of all VolkerStevin contracts
- Oversee and support the effective implementation of the EMS and liaise with clients to ensure their satisfaction
- Train, support and mentor their direct staff to develop their knowledge / application of the EMS
- Accept their individual role in providing environmental leadership and engage active participation of workers in improving environmental performance
- Ensure direct management under their control implement the Environmental Policy at all times
- Cooperate with the VolkerStevin Director of HSEQS to ensure proper communication exists at all levels
- Ensure adequate planning is undertaken to provide appropriate resources, training and systems of working
- Ensure the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treat the environmental management of sites under their control as a matter of the highest importance

Director of HSEQS (reporting to the MD)

It is the responsibility of the Director of HSEQS to:

- Ensure the effective use of the HSEQS department and its resources
- Assist the MD in setting realistic goals for continual improvement in environmental performance

Head of Sustainability (reporting to the Director of HSEQS)

It is the responsibility of the Head of Sustainability to:

- Ensure the effective use of the Environmental Team and its resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory, company and other requirements
- Ensure the goals set are periodically monitored to agreed standards
- Ensure the company is audited against the standards detailed in the IMS
- Play a key part in improving the environmental performance of our activities
- Represent VolkerStevin in communications with any environmental regulatory or other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where environmental incidents occur, and make recommendations to prevent recurrence
- Advise environmental training requirements
- Ensure that VolkerStevin environmental management documentation is appropriate and maintained to reflect any changes in legislation and company requirements

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5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Head of Sustainability (reporting to the Director of HSEQS) (CONTINUED)

- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Environmental Management and Assessment (IEMA), the Chartered Institute of Wastes Management (CIWM), and the Institute of Ecology and Environmental Management (IEEM)
- Develop the IMS to achieve the goals set
- Identify opportunities for improvement

Environmental Management - HSEQS Team

For the purposes of clarification under ISO 14001, environmental management is not outsourced. Dedicated Environmental Managers and Advisors are directly employed by the operational divisions of VolkerStevin and report into the Head of Sustainability. External environmental consultants are used when required.

In addition to this, VolkerWessels UK (VW UK) Corporate Responsibility provides strategic direction, performance management, occupational health, IMS management, technical services and compliance support to all of the VW UK companies.

Environmental Managers / Advisors (reporting to the Head of Sustainability)

It is the responsibility of the Environmental Manager / Advisor to:

- Inform, guide and support the workforce and in doing so create workplaces with a positive attitude to environmental management
- Play a key part in improving the environmental performance of our activities
- Visit sites regularly and monitor performance in relation to the policy and procedures
- Discuss and plan the implementation of future works with respect to the environment
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerStevin in communications with any environmental regulatory or other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management
- Ensure thorough investigation is made and appropriate records are compiled where environmental incidents occur, and make recommendations to prevent recurrence
- Advise on environmental training requirements
- Ensure that VolkerStevin’s environmental management documentation is appropriate and maintained to reflect any changes in legislation, company and other requirements
- Maintain their competence through continual professional development
- Adhere to a professional code of conduct as set through membership of the Institute of Environmental Management and Assessment (IEMA), the Chartered Institute of Wastes Management (CIWM), the Chartered Institution of Water and Environmental Management (CIWEM) or the Institute of Ecology and Environmental Management (IEEM)
- Identify opportunities for improvement

VW UK Corporate Responsibility Director (reporting to VolkerWessels UK CEO)

The Corporate Responsibility Director is responsible for the implementation and development of sustainable business practices throughout VolkerWessels UK shared services and business units, to maintain compliance to corporate, legal, and stakeholder requirements. Reporting to the VolkerWessels UK CEO, the responsibilities of the Corporate Responsibility Director are:

- Implementation and development of sustainable business practices throughout VW UK shared services and business units
- Maintaining compliance to corporate, legal, and stakeholder requirements
- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management

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5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Corporate Responsibility Director (reporting to VolkerWessels UK CEO) (CONTINUED)

- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communications within VW UK and to VolkerWessels
- Management of the integrated management system, its related systems and applicable memberships, affiliations and registration schemes
- Provision of occupational health services to VW UK and its business units
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VolkerWessels UK
- Development of systems and protocols, including IT platforms, to support the needs of the business
- Lead officer for major incidents and provision of legal support services

Integrated Management Systems (IMS) Managers (reporting to Corporate Responsibility Director)

It is the responsibility of the IMS Managers to:

- Establish the EMS requirements in line with BS EN ISO 14001:2015
- Work with the Corporate Responsibility Director and HSEQS teams to ensure legal, sector specific, and other requirements are integrated within the EMS
- Coordinate activities related to the implementation, development and maintenance of the EMS
- Control publishing and maintenance of the IMS within Workspace (our business management system)

VolkerWessels UK Corporate Responsibility Team (reporting to CR Director)

The VolkerWessels UK Corporate Responsibility Team provides strategic direction, performance management, occupational health, IMS management, technical services and compliance support to all of the VW UK companies.

Contracts Management / Site Supervision

It is the responsibility of contract / site management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company’s procedures for dealing with subcontractors and ensure proper cooperation and coordination takes place between the various parties who may share the workplace / site
- Provide an overall Environmental Management Plan for each project, making an adequate assessment of the risks involved, and ensuring that systems of work and method statements are produced, followed and reviewed in line with the EMS
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring induction is provided for those attending a location for the first time
- Ensure employees are aware of the company’s policy for environmental management and that they have understood its requirements
- Liaise with others as applicable and support initiatives for environmental representation
- Report all environmental incidents in line with company requirements, carry out investigations, make recommendations to prevent recurrence and ensure this information is effectively communicated
- Arrange environmental inspections and audits with the appointed Environmental Manager / Advisor
- Ensure that weekly health, safety and environmental inspections are carried out
- Implement the advice given by the company’s appointed Environmental Manager / Advisor
- Attend environmental training arranged by the company

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5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Site Foreman / Ganger

It is the responsibility of foremen and gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of environmental protection as it applies to particular construction operations Encourage the workforce to work in an environmentally acceptable and tidy manner
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Environmental Manager / Advisor
- Cooperate and liaise where appropriate with other contractors' site supervision

Commercial / Estimating / Procurement Managers

It is the responsibility of the Commercial, Estimating and Procurement Managers to:

- Ensure subcontractors and suppliers working on behalf of VolkerStevin are aware of this Environmental Policy and Practice document and are provided with site specific procedures and environmental management plans
- Check the environmental performance of suppliers and subcontractors for incidents, regulatory action, fines and court proceedings relating to environmental offences prior to contract award
- Arrange audits of suppliers and subcontractors with the Environmental Manager / Advisor
- Undertake a HSEQ start-up meeting with the appointed subcontractor or supplier at contract award
- Be familiar with statutory provisions relating to ethical and responsible procurement for specific contracts
- Understand the environmental resourcing and monitoring requirements when tendering a contract

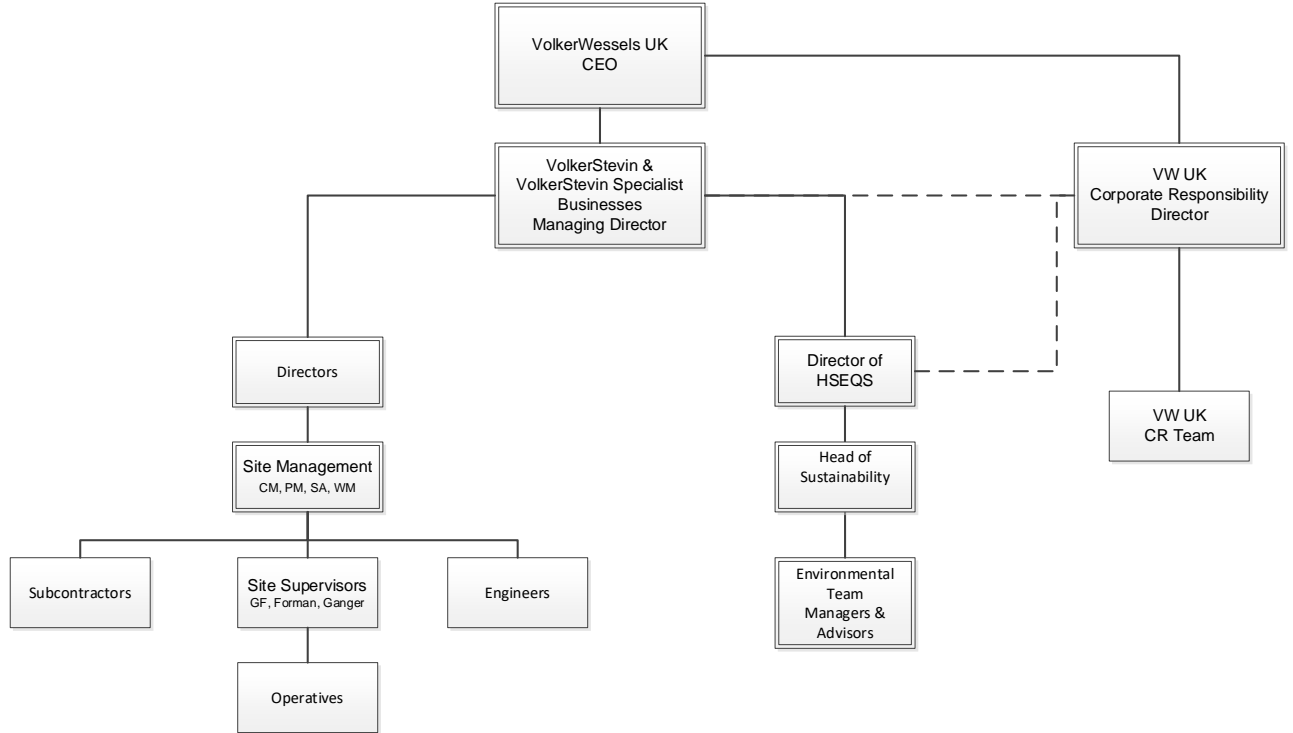
All Employees, Subcontractors and any other Person Working on our behalf

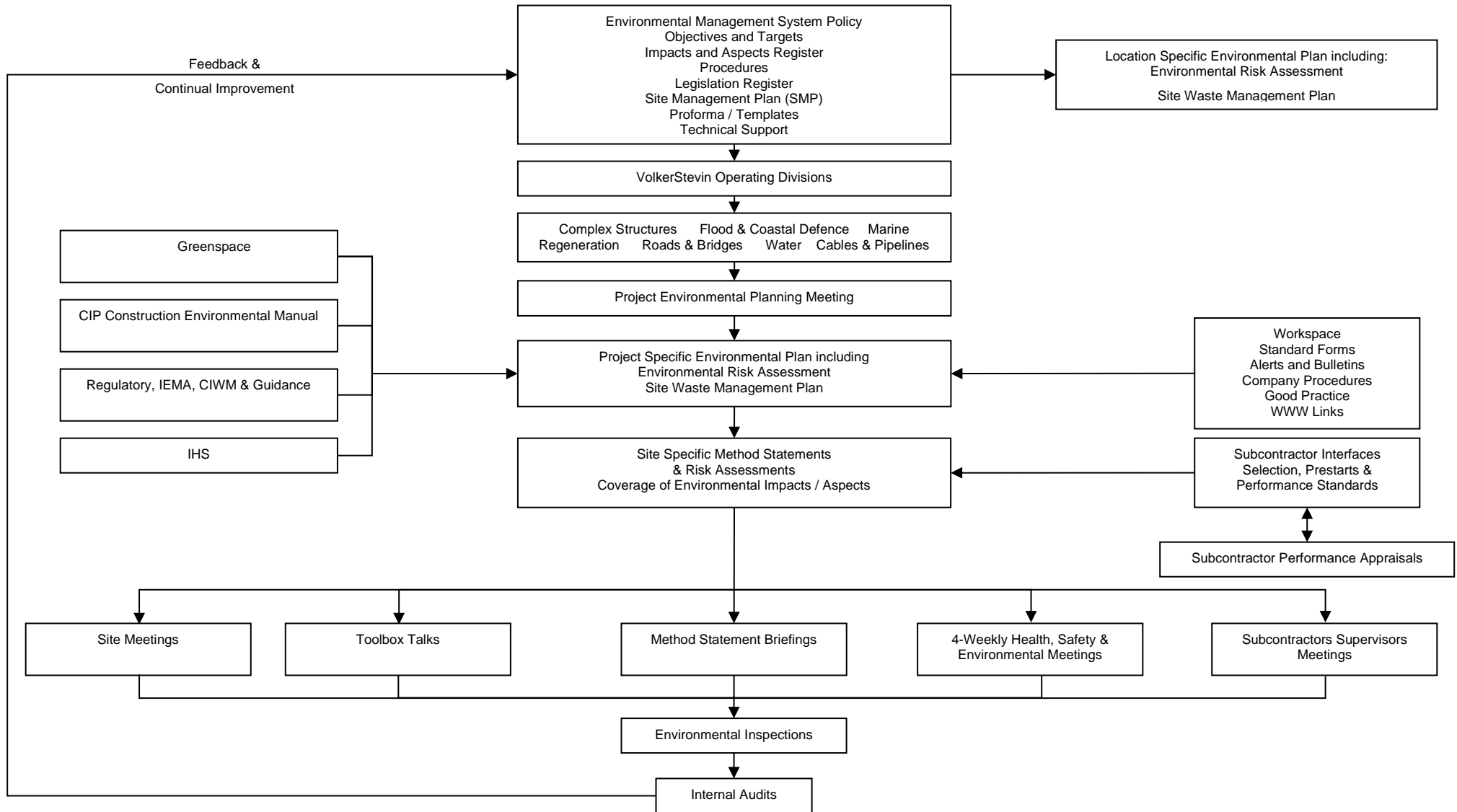
It is their responsibility to:

- Be familiar with the Environmental Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Environmental Policy applicable to them and take part in the protection of the environment
- Follow the instructions given regarding the prevention of pollution and environmental compliance as part of working methods for particular tasks
- Keep equipment in good order, use the correct equipment for the task, and report any defects in plant and equipment or any shortcoming in environmental protection to their Manager / Supervisor
- Contribute to a responsible culture, be aware of relevant site environmental rules and abide by requirements

5 ORGANISATION AND ARRANGEMENT (CONTINUED)

Organisation and Structure





6 PROCUREMENT POLICY

Introduction to the Procurement Policy

The environment and sustainability are key issues within our business. This strategy seeks to balance commercial considerations and quality whilst ensuring that environmental impact is considered.

VolkerStevin spends a significant sum each year on a wide range of materials. The vast majority of these materials are incorporated into the works that we construct.

Environmental and sustainability issues can be incorporated into the whole procurement process: defining the need, evaluating options, design and specifying, supplier selection, and post-contract management. For this reason, the procurement function is ideally situated to facilitate the development of procurement options that address environmental issues.

The objective is to deliver workable and commercially acceptable environmental solutions specific to each contract and our input and level of resources will directly relate to the potential environmental benefit.

This strategy is intended to facilitate incremental improvements, leading to significant benefits in the long-term.

Wherever possible within the constraints of the individual contracts, we will:

- Assess the environmental impacts of our procurement
- Seek continual improvement of our environmental performance and publicise the results annually
- Work with our suppliers and clients to ensure that, wherever practical, we procure materials to make a more sustainable environment for future generations

Addressing environmental and sustainability issues through the procurement process has the potential to deliver on these commitments in a cost-effective manner. This also provides opportunities to use our influence to ensure that our suppliers and clients also assist us in meeting these commitments.

This strategy demonstrates that we intend to proactively carry out our procurement function whilst equally recognising our responsibilities to the environment.

VW UK is absolutely committed to preventing slavery and human trafficking in its corporate activities. Our statement of compliance with the Modern Slavery Act 2015 sets out actions to understand the potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This commitment is also made in our Responsible Procurement Charter.

This strategy is endorsed and supported by the Main Board of Directors and Senior Managers of the company.

Aims of the Procurement Policy

The strategy is designed to support our “Environmental Policy and Practice” and in doing so:

- Reduce the consumption of raw materials throughout our business
- Increase the amount of recycled materials that we use
- Engage with the challenge of assisting the company to reduce its carbon emissions by advising on material purchases and providing evidence and data to research proposed solutions
- Increase the percentage of materials that we procure from sustainable sources
- Influence our suppliers in adopting positive approaches to the environment
- Deliver the most appropriate environmental solutions arising from our procurement function
- Develop and promote environmental procurement across the company
- Complement and work with existing environmental policies and initiatives within the company

Objectives of the Procurement Policy

Training and Awareness

To raise awareness and skills of appropriate staff across the business in how to assess and select most beneficial environmental procurement options.

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6 PROCUREMENT POLICY (CONTINUED)**Procurement Process**

To ensure most effective environmental assessments are integrated into everyday procurement functions and to provide all procurement staff with the relevant supporting tools and techniques that can be used without the need for any environmental expertise.

Communication

Promote awareness of this strategy within the business and to any appropriate external body.

Promote achievements and developments relating to environmental procurement within the business.

Research and Collaboration

Continuous research on environmental products, services, initiatives and forthcoming legislation etc. to ensure the procurement process takes account of latest developments.

Identify best practice and aim to introduce collaborative approaches with our clients.

Measurement, Reporting and Review

Based upon the information obtained from our own procurement activities and from our “Top” Suppliers, we will provide annual reports to the Managing Director, Purchasing Director and Corporate Responsibility Director.

Business Ethics

VolkerStevin will:

- Behave legally, honourably and ethically at all times
- Remain opposed to bribery and the receipt of goods within the context of all aspects of its business
- Trade and compete fairly, within a framework of applicable competition law
- Source a series of company-wide term deal orders to attempt sourcing of goods where possible and practical from local sources
- Attempt to ensure free and open trade within the guidelines of the specification and its ethical conduct. The client generally specifies goods and services, however where value engineering can be undertaken it is encouraged
- Procure fairly traded goods in line with the requirements of its clients and its own procurement guidelines

Social Value

VS has an obligation to measure and manage the contribution that we make to society and the communities we work in. E15 *Social Value* procedure provides the legal context to social value in the UK, it outlines how we measure and record social value, and what social value activities we encourage on our projects. We achieve this by using the Thrive Portal (unless there is a client specific requirement to use an alternative system) to report both non-financial AND financial data and rewards that we deliver to the communities in which we work. Social Value is recorded using the Impact Evaluation Standard (IES) that provide proxies and metrics to record and capture social value activities consistently across the business allowing for continuous improvement. We are working with our supply chain as we recognise they are a key enabler to achieving our corporate and contract Social Value targets, contributing to commitments during pre-construction and at contract award and supported by our in-house social value teams.

7 IMS AUTHORISATION**Document owner approval:**

Duncan Aspin, Director of HSEQS - 02.04.2024

Approval for IMS:

Alex Boatwright, IMS Manager - 02.04.2024

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