



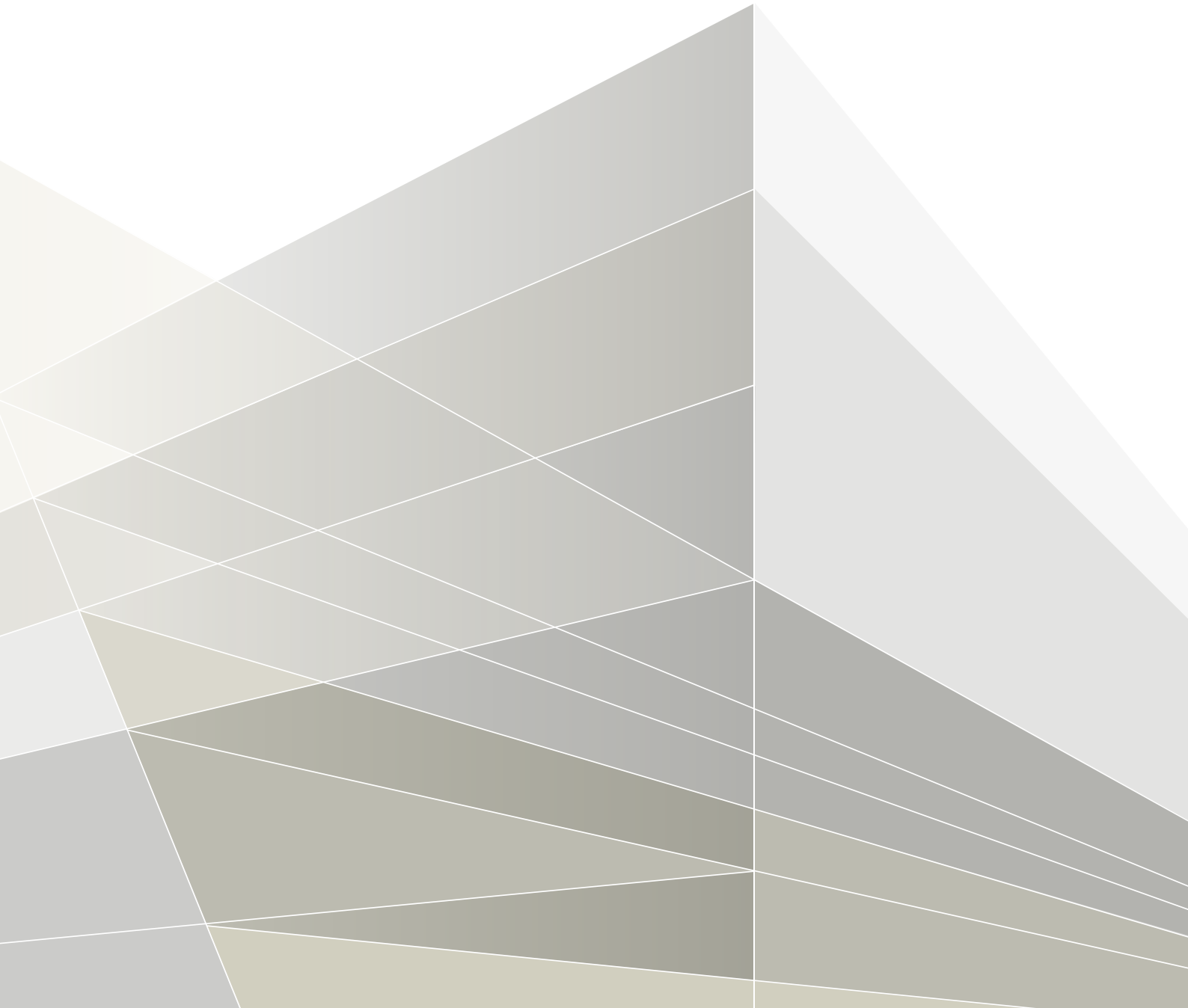
ENVIRONMENTAL POLICY

Policy Document

Updated: 1 April 2021

Revision: 2

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1. Objectives

- › Neo Construct recognises its obligation for the protection of the environment, its flora and fauna.
- › In undertaking its business, Neo Construct also recognises that without appropriate procedures and control measures, it has the potential to cause damage to the environment.
- › Accordingly, in the conduct of its business operations, Neo Construct will ensure such procedures and control measures are in place to safeguard the environment, whether required by statute or otherwise.
- › Furthermore, it undertakes to keep to an absolute minimum all forms of pollution whether by deposition of materials, discharges of fumes, liquors or dusts, also the generation of nuisance in the form of unnecessary noise.
- › In so far as it is able, Neo Construct will use its best endeavours to ensure its policy in the environment is actively followed by its staff and sub-contractors.

2. Methodology for Implementation of Objectives

Generally:

- › The Share Holders and Director have assumed responsibility for this policy and will provide the Managers their full support in its implementation.
- › Neo Construct has a management chart detailing the responsibilities of their staff and subcontractors in regard to their adherence of this policy.
- › The main Company goal is to provide PRACTICAL, MEASURABLE AND IMPROVING OUTCOMES of good environmental practice.
- › This will be achieved by the following:-

a. Raising of awareness

- › The Staff and Subcontractors of Neo Construct will be kept informed of current environmental issues by transmission of information to them identifying sources of information, e.g. websites, journals, books etc.
- › Each site office of Neo Construct's operations will display a variety of Environmental Awareness information as well as informative posters etc.
- › At the commencement of employment, all Company personnel will, as part of the normal induction procedure, be made aware of this Policy and their role within it.

b. Training

- › Those members of Neo Construct responsible for implementing this Policy comprising the Director, O.H.S. representative, Contracts Administrator and Site Managers will undergo training on an ongoing basis.
- › Other members of Neo Construct will also receive training, e.g. tool box talks. and also be encouraged to embark upon training programmes.

c. Integration of formal environmental protection procedures into day to day Company operating procedures.

- › Managing Neo Construct's environmental responsibilities effectively requires that suitable operating procedures are automatically incorporated.

- › The strategy for ensuring this takes place is as follows:-
- › Environmental matters will be separately considered whenever risk assessments are undertaken either at design or operational work stages.
- › Method Statements will be formulated to eliminate/minimise environmental damage.
- › Environmental matters, particularly emergency procedures, are to be incorporated within Health and Safety plans as a separate Appendix.
- › Environmental matters will be monitored at the workplace point of operations by a responsible person within each work team who reports to the Site Manager.

d. Regular Reviews & Audit

- › The monitoring of the Site will coincide with the O.H.S inspection undertaken monthly as a minimum will include an environmental component and generate a report for discussion at the monthly Management meeting.
- › Site Managers will inspect sites weekly or more frequently if required and log any adverse findings on the Environmental Survey. If action is required, follow procedure hereunder for any emergency or employ preventative measures in other cases.
- › Monthly Management meetings reviewing Neo Construct performance in key areas include an assessment of environmental issues both generally and in respect of all operational sites.

3. Specific Environmental Concerns & Responses

This list is not exhaustive but seeks to identify areas of concern regularly encountered within Neo Construct sphere of operations.

PLANNING specially to cater for environmental matters/issues is vital to ensure the best environmental outcomes.

a. Materials

All materials will be used strictly in accordance with the manufacturer's instructions and C.O.S.H.H. assessments. Any surplus will be disposed of in an authorised manner approved of by the Site Manager or other responsible person having taken advice if necessary all in accordance with the E.P.A. act amended 2006 Victoria.

b. Mechanical Plant

All mechanical plant will be in good condition, properly silenced and regularly serviced, copy of the plants log book must be provided. Inspections will be made by the Site Manger recording any leaks. Any such leaks found will be rectified without delay and any resultant contamination contained and/or eliminated, with reports to Neo Construct's O.H.S. Representative for further action as required. The storage of all fuels, oils will be discouraged.

c. Local Ecology

Comprises habitat, watercourses, hedgerows, woodland, marsh etc. also sites of specific scientific interest. Local information/advice will be sought from organizations such as Local Councils, EPA and other interest groups.

Protected species – bats, birds of prey, etc. will be protected where encountered, in certain instances, this may involve re-homing species which will require the intervention of specialists. Direct effects of construction operations may have unwanted effects, e.g. dewatering lowering water tables, draining wetlands/ponds etc. All such construction operations and their potential adverse effects will be subject to risk assessment and wherever possible, the adverse effects eliminated or ameliorated as far as is possible.

d. Pollution

Virtually everything used on a construction site can damage the environment if allowed to discharge into the environment in an uncontrolled manner. Neo Construct will ensure controls are in place and prevention of pollution will be the preferred option rather than remedial action which non-the-less will be instigated when prevention has failed.

Main pollutants:-

- › Hydro-carbons
- › Silt
- › Paints
- › Cement based products
- › Chemicals
- › Contaminated ground
- › Fire

All of the above and others identified at risk assessment stage will have procedures to prevent pollution drawn up and fall-back positions in the event of a pollution incident.

e. Dust and Emissions – Fumes

Construction operations invariably generate dust and some emissions/exhausts. At the least, such discharges may cause nuisance and at the worst, may cause a health hazard.

Planning the contract works and undertaking proper risk assessments will enable foreseen risks to be catered for. Particular attention will be paid in the event existing structures are demolished or modified to take account of any high risk materials, asbestos etc. requiring specialist treatment. Damping down can be effective in controlling dust but run-off must be controlled so that it does not pollute.

f. Noise and Vibration

Construction operations are generally noisy. Carry out work utilising properly maintained and silenced plant and equipment provided and operated by experts.

Agree procedures, protection provision and timing of particularly noisy operations with those affected if at all possible.

Do not operate plant unnecessarily, i.e. unnecessary idling. Consider the likely effects on buildings/structures of high vibration operations, i.e. piling. The nature of the ground conditions will be an important feature in determining the likely impact.

g. Site Surveys/Monitoring

Prior to work commencing on site and thereafter during the currency of the contract on a

weekly basis, the Site Manger or appointed responsible person will survey the site of the works to ascertain the level of risk to the environment stemming from Neo Construct operations.

h. Emergency Procedures

In the event of an adverse environmental incident, the following procedure will be adopted:-

- a) Whosoever identifies the problem will immediately try to prevent continuation of the problem, always providing it is safe to do so.
- b) Marshal sufficient help and resources to implement emergency prevention procedure where one exists. If one does not exist, consider and implement procedure for reducing/stopping incident impact.
- c) At first opportunity following preventative action, report incident in accordance with agreed reporting procedure.
 - i) Site Manager
 - ii) Client's Representative (especially if the Client's procedures are involved).
 - iii) Company O.H.S. Representative/ Director
 - iv) The appropriate Authority
- d) All emergency procedures must be "safe procedures" for those undertaking them.
- e) Log all relevant information concerning the incident and prepare report.
- f) Management will consider the report, learn lessons and promulgate information to all interested/affected parties.
- g) Emergency procedures will be practiced on a regular basis and at least once on every contract. The scenario will be comprehensive, properly thought through to provide a meaningful test. The outcomes will be reported to Neo Construct O.H.S. representative for general distribution throughout Neo Construct.

4. Waste Management and Disposal

Neo Construct will prevent waste wherever it can. It will adopt methods such as the Waste Hierarchy viz:

- › Reduce waste - control ordering/adequacy of storage procedures.
- › Re-use - topsoils, pipe beddings, bricks, tiles formwork.
- › Re-cycle - demolition materials/oils/lubricants.
- › Removal - to a facility which can recycle

a. Disposal of Waste

This will be in accordance with all statutory requirements, such disposal will be actively monitored on each site and disposal will be verified.

b. Reduction of Waste generally

Throughout Neo Construct's procedures for reducing waste/saving energy, reduction of unnecessary journeys, recyclable packaging, packaging removal and the sourcing of local contractors to reduce excessive traveling and cartage.

The Director and Managers of Neo Construct give their full support to this policy in ensuring that Environmental, Safety and Health is an integral part of its operational and management functions.

The Environmental Policy will be regularly updated to take account of legal and best practice amendments.

5. Glossary of Terms

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|------------|--|
| C.O.S.S.H: | Control of Substance Harmful to Health |
| E.P.A: | Environmental Protection Agency |
| O.H.S: | Occupational Health and Safety |

6. Endorsement

The directors / owners of Neo Construct endorse this policy, and commit to the outcomes and continued development of the policy

AUTHORISED BY:

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Director



EFFECTIVE DATE: 01/04/2021