

MadiganGill

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Environmental Policy

ENVIRONMENTAL POLICY CONTENTS

MadiganGill Group Holdings Limited

Incorporating:

MadiganGill Construction Limited

MadiganGill Limited

MadiganGill Logistics Limited

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ENVIRONMENTAL POLICY STATEMENT OF MADIGANGILL GROUP HOLDINGS

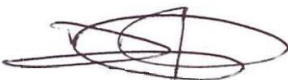
LIMITED This Policy applies to all areas and operations of MadiganGill's undertakings.

MadiganGill's principal operations are undertaken within the construction industry for various clients. We recognise that our operations interact with the environment and are firmly committed to eliminating or reducing adverse impacts from our business activities and promote a positive attitude to the conservation and enhancement of all aspects of our environment. Environmental factors will be taken into consideration in our business planning and decision making.

MadiganGill will achieve this through our commitment to:

- Employ systems and procedures that ensure the Company's compliance with all relevant environmental legislation, regulations and industry best practices.
- Identify its significant environmental aspects for all activities and put in place control mechanisms to mitigate their affects.
- Minimise the environmental impacts of its activities, prevent pollution and continually improve its environmental performance through setting objectives and targets and developing key performance indicators.
- Promote sustainable development by conserving energy, materials and resources, minimising consumption, maximising efficiency and effectively managing wastes; reducing waste levels and actively recycling waste materials for re-use.
- Promote design improvements to clients to enable the project's long term environmental impact to be minimised.
- Consider alternative installation methodologies to minimise the construction phase's environmental impact of projects.
- Identify and manage key risks and have arrangements in place to respond to all foreseeable incidents and emergencies.
- Ensure that all activities are undertaken with minimal impact on local communities and not creating a nuisance to our neighbours.
- Involve Employees and Contractors in our environmental programmes and provide training to enable them to discharge their responsibilities.
- Manage our supply chain to encourage their participation to minimise the use of materials, energy or processes which may be harmful to the environment.
- Include environmental issues in an annual report which will review our performance and make recommendations for the future.

The participation and cooperation of all employees and contractors is vital to the success of this Policy. This Policy is available to all interested parties upon request.



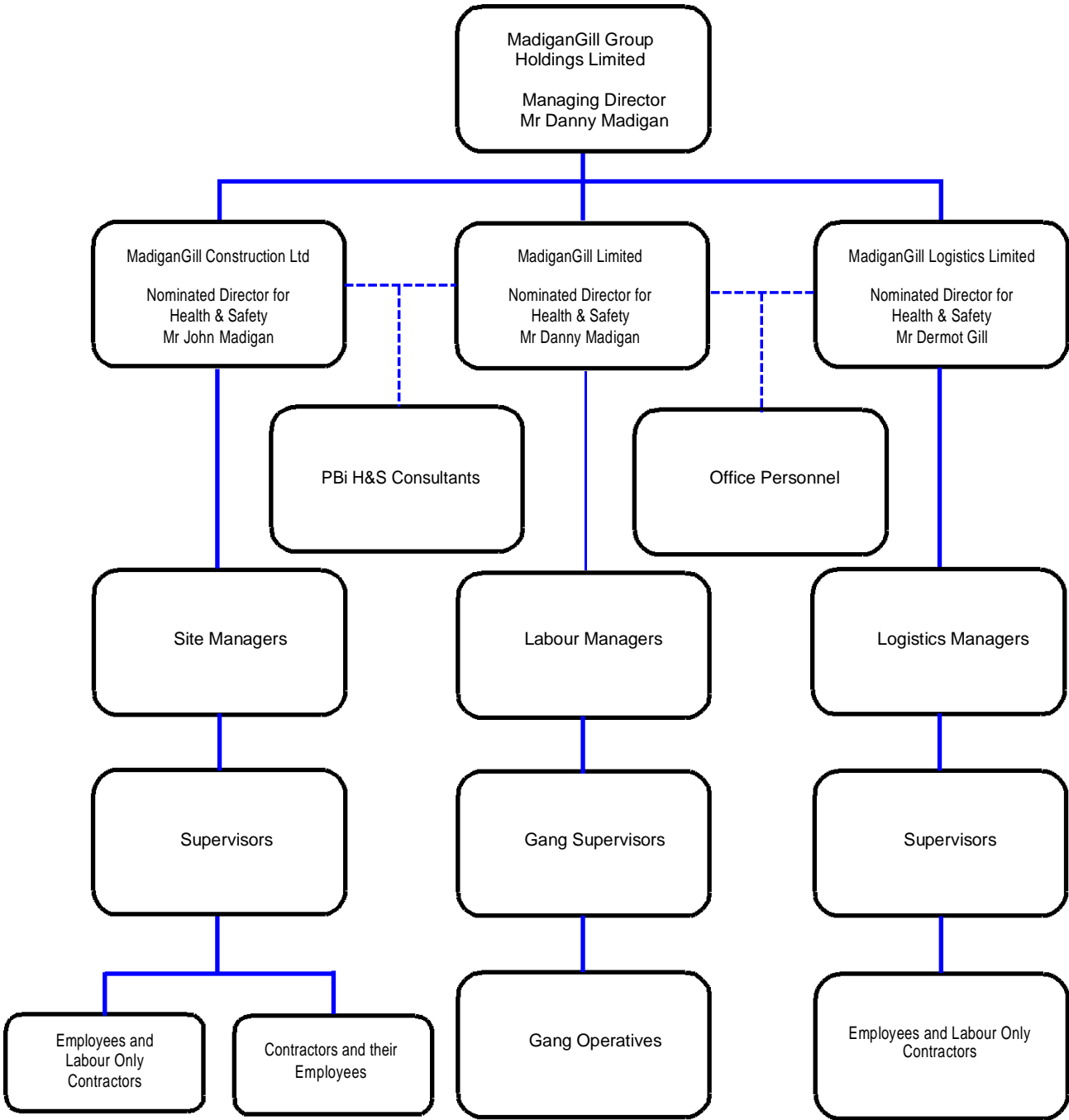
Mr Danny Madigan

Managing Director

MadiganGill Group Holdings Limited

Dated: 14th February 2019

ENVIRONMENTAL ORGANISATION CHART



— Denotes lines of communication

THE RESPONSIBILITIES OF THE DIRECTORS

Mr Danny Madigan has overall responsibility for ensuring that all employees understand their role, accountability and involvement in contributing to meeting the aims and objectives of the company's environmental policy.

Mr Danny Madigan has the full support and commitment from fellow Directors, Managers and Employees.

Further responsibilities for all Directors:

- To ensure that an Environmental Policy has been prepared and to update and review at regular intervals.
- To ensure that the Organisation's vision and direction, in relation to environmental aspects is consistent with current socio-economic factors.
- To agree and endorse the Environmental Policy and corporate objectives of MadiganGill.
- To develop policy commitments, review action plans and environmental targets.
- To ensure that the Organisation complies with all statutory legal requirements.
- To monitor environmental performance, management systems and internal procedures.
- To develop targets for procurement and requirements of stakeholders, contractors and suppliers.
- To ensure regulatory compliance and continual improvement in all environmental aspects.
- To identify employee training needs and maintain an environmentally aware workforce.

THE RESPONSIBILITIES OF THE HEALTH, SAFETY AND ENVIRONMENTAL CONSULTANTS

- To provide professional advice and support to MadiganGill on environmental issues, aspects and legislation.
- To develop, when requested, environmental procedures, programmes and achievable targets.
- To monitor environmental performance, management procedures and systems within the Company.
- To review overall environmental performance, identify weaknesses and make appropriate recommendations to Mr Danny Madigan.
- To inform Mr Danny Madigan of any relevant changes to environmental legislation and industry guidance

THE RESPONSIBILITIES OF THE MANAGERS AND SUPERVISORS

- To comply with all internal Company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement.
- To promote the Company's Environmental Policy and general awareness of the adverse environmental impacts.
- To ensure Employees are informed and aware of any specific environmental aspects of their work activities.
- To ensure Employees undertake work processes in accordance with the Company Policy and any training received.
- Collect and submit to Mr Danny Madigan, data and results of environmental performance.

THE RESPONSIBILITIES OF THE EMPLOYEES AND CONTRACTORS

- To comply with all internal Company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement.
- To always promote the Company's Environmental Policy and general awareness of the adverse environmental impacts.
- To ensure work processes are undertaken in accordance with the Company's Environmental Policy and any training received.
- To inform the Company of any areas of environmental management that may give rise to concern.

LIST OF APPLICABLE LEGISLATION

- Anti-Pollution Works Regulations 1999
- Building (Amendment) Regulations 2013
- Control of Noise at Work Regulations 2005
- Control of Substances Hazardous to Health (Amendment) Regulations 2004
- Electrical Equipment (Safety) Regulations 1994.
- Environmental Act 1995
- Environmental Permitting (England and Wales) (Amendment) Regulations 2012
- Environmental Protection Act 1990
- Fire and Rescue Services Act 2004
- Hazardous Waste (England and Wales) (Amendment) Regulations 2009
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Conservation (Natural Habitats) (Amendment) (England & Wales) Regulations 2009
- The Control of Pollution (Amendment) Act 2011
- The Control of Pollution (Oil Storage) (England) Regulations 2001
- The Controlled Waste (England and Wales) (Amendment) Regulations 2012
- The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991
- The Environmental Civil Sanctions (England) Order 2010
- The Groundwater (England and Wales) Regulations 2009
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2011
- The Waste (England & Wales) (Amendment) Regulations 2011
- The Waste Electrical and Electronic Equipment (Amendment) Regulations 2010
- The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009
- The Wildlife and Countryside (Amendment) Act 1991

ENVIRONMENTAL ARRANGEMENTS SECTION

ENFORCEMENT

The Environment Agency encourages individuals and businesses to put the environment first and to combine good environmental practices with normal working methods.

The aim of enforcement is to make sure business and industry take appropriate action to protect the environment, make sure regulations which prevent pollution are complied with and secure better outcomes for the environment, people and business.

The Environment Agency may decide to enforce when any of the following occur:

- An incident;
- Breach of the conditions of a permitted activity;
- Non-compliance with legislation.

Outcome-based approach

The following enforcement options are available to be used to achieve environmental outcomes and more specifically to:

- Stop offending;
- Restore and/or remediate;
- Bring under regulatory control;
- Punish and/or deter.

Enforcement powers

The enforcement powers available include:

- Enforcement notices and works notices (where contravention can be prevented or needs to be remedied)
- Prohibition notices (where there is an imminent risk of serious environmental damage)
- Suspension or revocation of environmental permits and licences
- Variation of permit conditions
- Injunctions
- Carrying out remedial works (where the Environment Agency carries out remedial works, they will seek to recover the full costs incurred from those responsible)
- Criminal sanctions, including prosecution
- Civil sanctions, including financial penalties

Civil Sanctions

Civil Sanctions provide The Environment Agency with new ways to protect the environment. They focus on investment

in environmental clean-up, rather than paying fines.

Civil sanctions do not replace any of the current enforcement tools. They provide a more flexible range, so that the most appropriate enforcement action can be used when an offence occurs.

The Environment Agency will still prosecute serious offenders, but they will be able to use alternative sanctions with legitimate businesses who are trying to do the right thing. Offenders will be able to put right the damage they have done and local communities will see a direct improvement in the environment as a result.

Unlike prosecution, civil sanctions are imposed or accepted by The Environment Agency. There are six types of civil sanctions:

- Compliance Notice - a Regulator's written notice requiring actions to comply with the law, or to return to compliance, within a specified period;
- Restoration Notice - a Regulator's written notice requiring steps to be taken, within a stated period, to restore harm caused by non-compliance, so far as possible;
- Fixed Monetary Penalty - a low-level fine, fixed by legislation, that the Regulator may impose for a specified minor offence;
- Enforcement Undertaking - an offer, formally accepted by the Regulator, to take steps that would make amends for non-compliance and its effects;
- Variable Monetary Penalty - a proportionate monetary penalty, which the Regulator may impose for a more serious offence;
- Stop Notice - a written notice which requires an immediate stop to an activity that is causing serious harm or presents a significant risk of causing serious harm.

Civil sanctions are available for offences under the following regulations applicable to our undertakings:

- Control of Pollution (Oil Storage) (England) Regulations 2001
- Environment Act 1995
- Hazardous Waste (England and Wales) Regulations 2005
- Hazardous Waste (Wales) Regulations 2005
- Water Resources Act 1991

A person guilty of an offence under The Environment Protection Act 1990 shall be liable to a fine not exceeding £20,000 or to imprisonment for a term not exceeding three months or to both in the lower court; or at the higher court, serious offences by businesses can extend to unlimited fines or to imprisonment for a term not exceeding two years, or to both.

AIMS AND OBJECTIVES

The aims and objectives of MadiganGill are to ensure that the environmental aspects of the Company's undertakings do not have any adverse environmental impact.

Where it is not possible to eliminate the impact, we will endeavour to reduce by the use of recycling, waste separation and other techniques.

MadiganGill recognises that an essential management principle is that objectives and targets aim to be "S.M.A.R.T"

Specific	Objectives and targets should be clear in their intention and results. Specific responsibilities should be assigned to individuals.
Measurable	Performance indicators should be used to assess quantifiable results so that the degree of achievement or failure can be identified.
Agreed	All stakeholders and individuals involved or responsible for environmental aspects and achieving targets should have an opportunity to contribute and comment on it.
Realistic	Targets and objectives should be achievable in relation to resources available and other business priorities, but not too easily reached.
Time-based	Targets and objectives should be achieved in a given specified time frame. If the objective period is many months or years, monitoring of progress should be undertaken.

AIR

MadiganGill will ensure through its maintenance and purchasing programme, that mobile machinery used on its projects meets the emissions of gaseous and particulate pollutant levels outlined in various E.U. Directives and that continuous improvement is achieved.

MadiganGill will ensure through its maintenance and purchasing programme, that site mobile machinery meets the emissions of gaseous and particulate pollutant levels outlined in various E.U. Directives and that continuous improvement is achieved.

Dust will be reduced as far as is practicable by the enclosure of working areas, preventing migration outside the working area. Where and if possible, filtered extraction will be used to collect dust produced by static machinery.

COMMUNICATION

Effective two-way communication between employees at all levels is seen by MadiganGill as an important part of ensuring the protection of the environment. MadiganGill will work with all persons affected by their undertakings to ensure that information on environmental aspects and impacts are shared.

Communication with Employees will take various forms and Employees are reminded that they may raise any health or safety issue with any member of Management in total confidence. Employees are actively encouraged to raise any concerns they may have in relation to environmental aspects.

CONTAMINATION

Where necessary, site investigations will be undertaken by the Client prior to the commencement of works, with the results communicated by the Principal Designers construction phase plan or by the Clients CDM Coordinators pre-construction information.

Should the details of a survey not be supplied and it is suspected that pollution is present at the commencement of works, the Client or CDM Coordinator will be contacted to arrange a decontamination operation or be asked to provide an adequate survey.

DISPOSAL OF CONCRETE ON CONSTRUCTION SITES

If you are using concrete or grout, ensure it is contained within a suitable barrier within your working area to prevent its escape and entering any watercourses or surface water drains. Concrete and grout products are highly alkaline and corrosive and can cause serious pollution and damage to the ground, watercourses, water wildlife, invertebrates and fish, as they are very sensitive to changes in pH levels. Concrete also contains chromium, which is potentially polluting not only to watercourses but also to groundwater.

Trucks, hoppers, mixers and concrete pumps that have contained concrete must be washed out in a contained area away from watercourses, surface water drains, storm water drains, grids and channels to prevent pollution. Where possible, store and reuse washout water.

Pollution Prevention

Concrete and cement mixing should be:

- Sited on an impermeable designated area
- At least 10m away from a watercourse or surface water drain, to reduce the risk of run-off entering a watercourse
- Surplus dry concrete, cement and grout should be used elsewhere on site if possible, or as inert rubble; if not, it will need to be disposed of off-site and transported using a registered waste carrier
- Equipment, batching and ready mix lorry washing and cleaning should be washed out on site into a designated area that has been designed to contain wet concrete / wash waters
- Wherever possible, excess concrete should be sent back to the batching plant. With design concrete, this may not be possible, so you should build a designated area to allow the concrete to cure without polluting the ground or watercourses
- Store wash waters to let them settle out and have re-circulation systems to reuse the water (e.g. for mixing and washing) to minimise the risk of pollution and reduce water use. Re-circulation systems include the use of sumps, specifically manufactured equipment, to a simple metal container. A lined and covered skip may be suitable for smaller sites providing it is in good condition (i.e. water-tight) and solids are frequently reused, recycled or removed and disposed of legally. (The site size and material amounts will determine facilities utilised)
- Collect wash waters that cannot be reused to:
 - Discharge to the foul sewer (you must have prior permission from the local sewerage provider for this) or;
 - For authorised disposal off-site by a registered waste carrier.
- It may be possible to reuse the solids that settle out during storage otherwise they will also need to be disposed of legally.

Further Considerations

Ensure all cement bags are sealed after use, stored appropriately to prevent leaks or dust (preferably in a waterproof building or storage container) and disposed of legally off-site, never buried or burned. Provide a contained wash-off area for tools.

Consider the types of cement, concrete and grout ordered - e.g. use quick setting products in structures in or near watercourses.

Do not over order materials and consider the timing of deliveries; you are more likely to have waste cement and concrete if it is delivered at the wrong time.

Should the details of a survey not be supplied and it is suspected that pollution is present at the commencement of works, the client or CDM Coordinators will be contacted to arrange a decontamination operation or requested to provide an adequate survey.

DRAINAGE

MadiganGill will undertake to eliminate risk to groundwater systems by identifying underground services before

the

commencement of a project, and marking all necessary plans and drawings to ensure that all relevant services are identified and marked prior to commencement of works.

We are aware that permission will be required from the local sewerage provider before discharging anything other than clean uncontaminated surface water to any drains.

Drainage will be identified by type, for example, surface water drains, soakaways, land drains foul water and combined sewers. Identification will also extend to protection measures, such as oil separators, interceptors and silt traps.

Drain covers will be marked to identify the type of effluent, for example, Blue for surface water, Red for foul water and Red C for combined foul water.

ELECTRICAL AND ELECTRONIC EQUIPMENT

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2009 (WEEE Regulations) introduced new responsibilities for businesses that use electrical and electronic equipment (EEE).

When disposing of any electrical waste, MadiganGill will comply with the requirements of our duty of care as detailed in the WEEE Regulations.

ENERGY CONSERVATION

Increasing energy costs, coupled with both National and Governmental needs for energy conservation, has resulted in "Energy Management" being regarded as an important task in all of the work activities undertaken by MadiganGill.

MadiganGill recognises that energy efficient measures can be achieved through the correct selection of appropriate plant and equipment.

Energy saving requirements may also involve such things as ensuring a piece of plant has completed all necessary tasks before being withdrawn from a project as its return to site at a later date will result in poor logistic management and added pollution.

All persons involved at the planning or tendering stage of projects will fully consider all possible areas of energy reduction and conservation.

ENERGY PERFORMANCE

In accordance with the requirements of The Building (Amendment) Regulations 2013, MadiganGill will supply the Client with an Energy Performance Certificate. This is required where a building is erected or modified to a greater or lesser number of parts designed or altered for separate use than it previously had, where the modification includes the provision or extension of any of the fixed services for heating, hot water, air conditioning or mechanical ventilation.

ENVIRONMENTAL PROTESTORS

At MadiganGill, we consider that, through the implementation of this policy document, we are doing our practicable utmost to protect the environment during all of our activities. However, should we ever experience the onset of environmental campaigners onto any one of our construction sites, we shall attempt to deal with them in the most respectful and considerate manner possible.

It is, of course, our primary interest to allow our Employees and Contractors to work without fear of verbal abuse and physical violence from individuals, who may disagree with our construction methods, chosen locations or motives. It will, therefore, be the responsibility of our Site Management to contact the police immediately in the event of protestors congregating on, or around, any of our sites. Our security measures shall always be of a sufficient extent to prevent the entrance of intruders onto our sites.

Should an unauthorised individual happen to gain access to a construction site there is a distinct possibility that they could be injured by a hazardous process or item of plant / equipment, it is therefore in the interest of safety (to both our employees and unauthorised persons), that intruders shall be prohibited from entering any of our sites where

construction activities are taking place.

Should any environmental campaigners wish to peacefully scrutinize our methods of work, we shall be pleased to provide them with documented proof that our concerns lay very much within the preservation of our environment, as outlined in the contents of this Policy.

ENVIRONMENTAL SUSTAINABILITY

MadiganGill has the responsibility for ensuring ongoing environmental performance, identification of environmental risks, recording and monitoring of impacts and implementing environmental and social sustainability measures.

The key themes we aim to action are:

- Design for minimum waste
- Minimise waste
- Minimise energy in construction use
- Do not pollute
- Preserve and enhance biodiversity
- Conserve water resources
- Respect people and local environment
- Monitor and report (i.e. use benchmarks)

Special consideration will be given to employing local contractors and wherever efficient and environmentally sustainable, materials products and services will be sourced locally.

We encourage Employees and Contractors to promote our commitment to environmental and social sustainability. **LOCAL COMMUNITY ENGAGEMENT**

MadiganGill accepts that, although the community may not have a direct relationship with our projects, it is nevertheless, impacted by our construction activities and the resultant infrastructure.

If we should receive any complaints about our activities, we would respond quickly and record any information so that we can improve our performance.

NOISE

MadiganGill will undertake to work within the parameters outlined by the Client or the Local Authority to restrict noisy activities to the time periods requested. All controls will be applied, including a rigid maintenance regime, sufficient damping, lagging and other acoustic controls to ensure the reduction of noise.

MadiganGill will undertake to act proactively, to ensure the elimination of unnecessary noise and to reduce noise that is produced, to an acceptable level

Best Available Technique (BAT) will be used to prevent the effect of noise to the limit reasonably practicable, having regard to the local conditions and circumstances, to the current state of technical knowledge and to the financial implications.

OFFICE WASTE

Through careful and efficient office management and the implementation of a quality system, the amount of waste created is kept to an absolute minimum. MadiganGill is also promoting the recycling of office waste wherever possible.

Electrical energy is conserved by using high efficiency, fluorescent lighting.

Natural energy used in heating systems is conserved by regular maintenance, servicing and individual thermostatic controls.

OIL STORAGE

In the construction industry, one of the major routes of pollution is due to the leakage of oils and fuels onto the ground. MadiganGill are aware of this problem and their statutory duties in accordance with The Control of Pollution (Oil Storage) (England) Regulations 2001. MadiganGill will ensure that all oil will be stored in a container which is of sufficient strength and integrity, to ensure that it is unlikely to burst or leak while used on site and that tanks have a secondary containment system not less than 110% of the containers storage capacity.

All tanks and mobile bowsers will be positioned or other steps taken, to minimise any risk of damage by impact and drip trays used where the fill pipe is not positioned within the secondary containment system or "bund". All filling devices will have a tap or valve which closes automatically when the filling tap or gun is not in use. and A lockable valve which will remain locked when not in use in the prevention of oil spills because of vandalism.

There will be strict guidelines for the filling of machinery tanks and a formal procedure for the clearing of any spills and subsequent disposal.

POLLUTION

The Employees of MadiganGill are aware of the importance to protect the integrity of groundwater, rivers, lakes, ground and air, and other elements of the eco system. The Company recognises duties under the Control of Pollution (Oil Storage) (England) Regulations 2001, Groundwater (England and Wales) Regulations 2009, Anti-Pollution Works Regulations 1999 and the Water Resources Act 1991 Regulations 2009 (Amendment).

Pollution processes, for example releasing any substances that can harm people or animals, plants, soil, water or air; for example, an oil spill, silty water getting into a river or smoke into the air, are prevented by ongoing training and awareness of Employees.

Employees of MadiganGill are made aware of the common causes of pollution, such as illegal discharges; burning of waste; pollutants carried by rain water run-off; poor maintenance regimes and accidental spillages or vandalism, and are actively encouraged to report and proactively deal with pollution situations as soon as practical.

MadiganGill recognises they have responsibility for preventing pollution on site, and have engaged a 'responsible person' to manage activities and risks including deliveries, oil and chemical storage and placement and maintenance of plant.

MadiganGill recognises that efficient monitoring of pollution will serve to enhance the Company's reputation, reduce nuisance to our neighbors, save us time and delays, avoid fines, help to win future work and protect the environment.

PREVENTING FUEL ENTERING ADJACENT WATERCOURSES AND DRAINAGE SYSTEMS

The risk of spillage is at its greatest during refueling of plant. MadiganGill will adopt the following precautions to prevent fuel spillage entering watercourses:

- Where possible, we shall refuel mobile plant in a designated area, preferably on an impermeable surface and away from any drains or watercourses.
- Keep a spill kit available.
- Never leave a vehicle unattended during refueling, or allow our staff to jam open a delivery valve.
- Check hoses and valves regularly for signs of wear, and ensure that they are turned off and securely locked when not in use.
- Diesel pumps and similar equipment shall be placed on drip trays to collect minor spillages. These will be checked regularly and any accumulated oil will be removed for disposal.

- In the event of a large spillage on site, the material shall be contained (using an absorbent material such as sand or soil or commercially available booms), and the Environment Agency will be notified immediately.

PREVENTION OF POLLUTION FROM PLANT AND MACHINERY

In order to prevent materials leaking from static plant, such as company vans, contaminating the ground and being washed into the drainage system, MadiganGill shall place static plant on drip trays or bunded areas.

Facilities for washing plant and equipment contaminated with concrete or other chemicals will be provided. Wash water from these facilities will be managed so as to prevent pollution of surface water and groundwater.

PROTECTION STRATEGY FOR WILDLIFE, TREES, WATERCOURSES AND LANDSCAPE FEATURES

It is important to MadiganGill as a Company to minimise the impact of their projects on local wildlife.

MadiganGill will undertake an environmental appraisal, which properly accounts for biodiversity, as an element of all of our development proposals; regardless of the statutory necessity to do so.

Our key considerations and actions include:

- To use materials with similar PH values so as not to adversely affect adjoining habitats by 'leaching'.
- To try to source our materials locally, especially if they help to support the ecology and habitats of the region. This will also reduce our travel whilst supporting the local economy.
- MadiganGill will conduct our activities and operations to reflect best environmental practice and implement an environmental management system to pursue sustainability, continual improvement and the prevention of pollution.
- We will:
 - Comply with all applicable legal and other requirements.
 - Identify environmental aspects and prioritise action to reduce them.
 - Set challenging targets to reduce our environmental impacts and regularly review progress.
 - Raise awareness of the environment amongst our employees through training our Environmental Coordinator's network and communication of environmental performance.
 - Report annually on our progress and performance, making this available both within the Office and externally
 - Undertake regular management reviews to ensure that our environmental management system remains effective.

All of our demolition activities shall be completed in accordance with the requirements of Conservation of Habitats and Species Regulations 2010 and The Wildlife and Countryside Act 1981.

PURCHASING

MadiganGill will ensure that all our wholesalers and suppliers provide us and our customers, with goods and materials that have limited environmental impact. The aim of the Company is to achieve this by:

- Purchasing goods, plant and materials, which can be manufactured, used and disposed of in an environmentally responsible way;
- Meeting, where appropriate, the standards required by all environmental legislation;
- Specifying and purchasing of plant and items which will, in the first instance, have a long working life and can be recycled when the service life has ended;

- Specifying and purchasing items which can be operated in an energy efficient manner;
- Specifying and purchasing items that are of the best quality, have replacement parts and are not part of the “throw away” culture;
- Selecting suppliers and contractors who are themselves undertaking measures to make environmental improvements;
- Purchasing equipment with due consideration of noise, emissions and vibration produced;
- The negotiation of favorable rates from water, gas and electrical service providers.

RECYCLING

MadiganGill, as a Company, is committed to reducing waste in its operations and works. Where waste may be produced, every effort will be made to recycle such materials, i.e. metals, etc.

MadiganGill will make full use of any recycling facilities provided by the Supplier, Manufacturer, Principal Contractor or Local Authority.

REMOVAL OF TREES WITH PRESERVATION ORDERS

With certain exceptions, it is illegal to fell trees in Great Britain without prior Forestry Commission (FC) approval. All cases of suspected illegal felling are investigated, and prosecution may ensue. FC and The Department of Agriculture and Rural Development (DARD) Forest Service Policy is that areas felled will be replanted or naturally regenerated, except where felling is allowed for environmental improvement or to enable development authorised under planning regulations.

A Tree Preservation Order (TPO) is made by the Local Planning Authority (LPA) usually a local council to protect specific trees and woodland from deliberate damage and destruction. TPO's prevent the felling, topping, lopping or uprooting of trees without permission from the planning authority.

MadiganGill accepts that, if we should deliberately destroy a tree, or damage it in a manner likely to destroy it; we could be fined up to £20,000 if convicted in the Magistrate's Court. We are also aware that we will normally have to plant a replacement tree if the tree was cut down or destroyed.

MadiganGill shall seek permission from the Forestry Commission to fell any growing trees that may be present on any of our sites. We shall not begin felling until we have been issued with a license or received other permission from the Forestry Commission.

An application form will be obtained from the appropriate Forestry Commission office. It shall be completed and submitted for approval, along with two signed copies of a map of the area showing the location of the trees that we wish to fell. It is estimated that a license shall be issued within 10 weeks from the receipt of application.

If we are unsure as to whether a tree is covered by a protection order, we shall contact the local Planning Authority's offices to ask for details of TPOs in operation within the surrounding area.

SITE WASTE MANAGEMENT

MadiganGill will use good practice to ensure that reduction of wastes materials in the following areas;

- Purchasing strategies or methods of work aimed at reducing waste;
- The on-site re-use or recycling of site-gained materials;
- The responsible disposal of waste;
- Provide relevant information to the Principal Contractor on waste types and amounts.

- Obtaining relevant information from Sub-Contractors
- Keeping records of waste disposal on site during the project;

Records to be kept

- Types of waste removed from the site;
- The site that the waste is taken to.
- Identity of the person who removed the waste and their waste carrier registration number
- Site that the waste was taken to;
- Environmental licenses or exemption held by the site where the material is taken.

We will comply with the duty of care for waste. We will record all waste movements. **STORAGE**

AND USE OF CHEMICALS, FUEL/OIL AND OTHER CONSTRUCTION MATERIAL

Chemicals will be stored in secure designated, (bunded where necessary) storage areas and in accordance with the appropriate regulatory requirements, including the Control of Substances Hazardous to Health (Amendment) Regulations 2004 and The Control of Pollution (Oil Storage) (England) Regulations 2001. Refueling of vehicles and machinery will be undertaken in accordance with a specified procedure that may include the designation of refueling areas. Spill contingency plans will be drawn up and included in the procedures. Stockpiles of dry materials will be stored in locations that prevent contamination of surface waters.

Oil shall be stored in a container which is of sufficient strength and structural integrity to ensure that it is unlikely to burst or leak in its ordinary use.

The container shall be sustained within a secondary confinement system which satisfies the following requirements:

- It will have a capacity 110% of the container's storage capacity or, if there is more than one container within the system, of not less than 110% of the largest container's storage capacity or 25% of their aggregate storage capacity, whichever is the greater;
- It will be positioned to reduce the risk of damage by impact so far as is reasonably practicable;
- Its base and walls shall be impermeable to water and oil;
- Its base and walls shall not be penetrated by any valve, pipe or other opening which is used for draining the system.

If any fill pipe, or draw off pipe, penetrates its base or any of its walls, the junction of the pipe with the base or walls shall be adequately sealed to prevent oil escaping from the system

TRAINING

All employees will be given training in general environmental awareness, task specific procedures and methods that can be used to reduce or minimise the impact to the environment by the undertakings of the Company.

PBi H&S Consultants will assist Mr. Danny Madigan or the nominated Director for Health & Safety in identifying training needs throughout the Company, preparing appropriate training programmes and delivering those programmes to Employees.

WASTE

MadiganGill will take all such measures as are reasonable in the circumstances to apply The Waste Hierarchy approach to prevent waste, and to apply the hierarchy as a priority order when transferring waste to another

person, as recommended by Defra.

In March 2011, The Waste (England and Wales) Regulations 2011 introduced changes to the information that must be included on waste transfer notes:

- a declaration that the waste producer or holder has considered the waste hierarchy when deciding how to deal with their waste, and;
- the SIC code of the waste producer using SIC 2007 codes (consignment notes for the movement of hazardous waste will still require SIC 2003 codes).

The requirement to produce waste transfer notes came into force September 2011 and should be accompanied with a declaration, with wording to this effect:

I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of The Waste (England and Wales) Regulations 2011.

This approach ranks waste management options according to the needs of the environment. Top priority is given to prevention, preparation for re-use, recycling, recovery and disposal (e.g. landfill).



MadiganGill recognises its Duty of Care under The Environmental Protection Act 1990, The Waste (England & Wales) Regulations 2011, Hazardous Waste Regulations (England and Wales) 2009 and other associated statutory provisions.

“Hazardous Waste” will only be released via a licensed “Registered Carrier” after proof, (original only) has been produced by an “authorised person” and a copy retained. All parts of the Waste Transfer Note will be suitably completed with a copy remaining with MadiganGill. Records of any “Hazardous Waste” disposal are to be retained for 3 years after deposit of the waste.

The amount of hazardous waste produced in a year without registering with the Environmental Agency has risen from

200kg to 500kg as of April 2009, where over 500kg of “Hazardous Waste” is produced over a 12-month period at our premises, MadiganGill will register that location with the Environment Agency, and annually after the initial notification.

All waste will be suitably packed to ensure the safety of others during storage and carriage, and have a unique consignment code consisting of letters, numbers or a symbol. This packaging must also prevent spillage, leakage, waste blowing or falling or the pilfering of contents by third parties.

WATER

The Employees of MadiganGill are aware of the importance to protect the integrity of groundwater, rivers, lakes and other elements of the water system. The Company recognises duties under the Control of Pollution (Oil Storage) (England) Regulations 2001, Groundwater (England and Wales) Regulations 2009, Anti-Pollution Works Regulations 1999 and the Water Resources Act 1991 Regulations 2009 (Amendment).

Section 85 of the Water Resources Act 1991 Regulations 2009 (Amendment) which states that, 'no person shall cause or knowingly permit any poisonous, noxious or toxic material or solid waste to enter a 'controlled water'. 'Causing' means not only deliberately releasing any polluting matter, but also causing the pollution accidentally, by being the Operator of a plant or process.

Where necessary, to prevent water pollution, drain covers, self-contained water systems and other methods will be used. Detergents and solvents are to be as environmentally friendly as possible and where not possible MadiganGill will ensure that the migration of substances does not adversely impact on the environment.

MONITORING OF THE POLICY

Employees are encouraged to bring to the attention of the Director, areas, which in their opinion, this Policy appears inadequate. All such comments will be passed to our Independent Safety Advisors for their consideration and review.

This Policy and Arrangements will be reviewed on at least an annual basis. Provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

HEALTH & SAFETY POLICY DOCUMENTATION REVIEW			
To ensure that we comply with the requirements imposed by the Health and Safety at Work etc. Act 1974, our Health and Safety Policy Statement and Documentation will be reviewed periodically and at least annually.			
DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	NEXT REVIEW DATE
1 st January 2015	EC Safety Solutions Limited	Initial Policy	1 st January 2016
22 nd January 2016	EC Safety Solutions Limited	Revision 2	22 nd Jan 2017
14 th Feb 2017	EC Safety Solutions	Revision 3	14 th Feb 2019
14 th Feb 2017	EC Safety Solutions Limited	Revision 3	14 th Feb 2017
14 th Feb 2019	PBi H&S Consultancy	Revision 4	13 th Feb 2019