The Kellcon Group is committed to a positive and responsible course of action with regard to those aspects of the business which impact upon the environment. It seeks always to act in accordance with good practice, preserving and, where possible, enhancing the quality of the environment.

ENVIRONMENTAL POLICY STATEMENT

Commitment to the environment is demonstrated by maintaining an Environmental Management System, which meets the requirements of ISO 14001. The Kellcon Group are actively working towards gaining ISO 14001 certification. Key components of the system include the establishment of environmental objectives and targets which require the company to achieve continual improvement and the establishment of programmes to ensure satisfaction of these improvements, objectives and target.

The strategy addresses the following key areas to:

- Review Environmental impacts pre-work
- Improve materials and resource Management
- Increase employee awareness and training
- Protect natural resources, watercourses, forestation, etc
- Recycle materials and minimize waste
- Relate to customers and regulatory authorities
- Safely transport and dispose of waste materials

Management, staff and employees are encouraged to liaise and work closely with suppliers, sub-contractors and customers to ensure the services will meet and exceed all regulatory requirements. Questions and enquiries should be directed to the Directors of the company.
Signed:
Director
K Ellis

Dated 01 October 2014

3. Environmental Policy (v1)

Issue Date: 01 October 2014
Green Procurement Policy

This policy is intended to provide The Kellcon Group, and those involved in the procurement of services, contractors and materials, with a framework for assessing and assigning environmental criteria to procurement decisions. As an organisation The Kellcon Group is aware that all the products, services and contractors it procures have an environmental impact relating to their production, distribution, use and end of life disposal. This policy therefore aims at tackling these issues directly and links into the organisation's Integrated Management System.

The Kellcon Group assigns preference to the purchasing of environmentally sustainable products and services that meet its internal environmental management system and regulatory requirements.

This policy also ensures that personnel, customers and suppliers are aware of Kellcon Group's minimum environmental requirements. Key to the implementation and continuing success of this policy will be education, training and raising awareness for internal personnel, contractors and communication with suppliers on an ongoing basis.

Supplementary detailed guidance accompanies this policy and is held within the Kellcon Group Integrated Management System Manual. This policy will be reviewed on an ongoing basis throughout the year.

The Kellcon Group Policy Commitments

We will work with our suppliers to encourage the use of environmentally sustainable materials through dialogue, raising awareness and by applying environmental standards to screening of suppliers and to supplier contracts.

For all products, services and contractors the Kellcon Group will seek to give preference to procuring materials that:-

- Minimise ecological damage, such as loss of habitats or biodiversity
- Minimise the depletion of non renewable resources
- Are durable
- Can be re-used, recycled, refilled, recharged or reconditioned
- Can be easily upgraded by adding or replacing parts
- Have a recycled content
- Are accredited to a recognised environmental standard such as:
  - Forestry Stewardship Council (FSC),
  - EU energy ratings of white goods, and
  - The Mobius Loop for products containing recycled materials.
- Eliminate or minimise elements which are deemed to be hazardous to human health
- Minimise impacts on climate change.

5. Green Procurement Policy (v1)

Issue Date: 01 October 2014
We will consider supplier locality as a selection criteria with the aim of minimising environmental impacts of transport and distribution.

In supplier selection we will seek to balance the above environmental factors with other factors such as cost, health and safety and other relevant supply chain issues such as labour rights. While recognising that there may be conflicts between these factors, we will strive for the optimal balance through consultation with our stakeholders.

This policy applies to materials procured for both the Kellcon Group sites and offices.

Signed:
Director
K Ellis

Dated 01 October 2014
Pollution Prevention and Environmental Management – Supplementary Policy

The risk of adverse environmental impacts can be significant during construction. For large scale developments, we would expect all potential pollution risks and all aspects of site work, which may impact on the environment, to be systematically identified, as well as preventative measures and mitigation.

The pollution prevention policy sets out that all principles of pollution prevention and mitigation measures on the following issues, where relevant, are carried out and monitored at all sites:

- Monitoring proposals, contingency measures and emergency plans, including an environmental checklist to monitor and plan the timing of all works on all sites including:
  1. daily visual inspections and the recording of required environmental actions
  2. proposals for planning future activities
  3. identification of all construction elements and their location in relation to sensitive receptors

- Details of how the works will be programmed to avoid any adverse impact on sensitive receptors. A timetable of works that takes into account all environmental sensitivities, should be included.

- Protection of development in relation to all works

- Surface water management plan - The site specific principles of how drainage will be controlled

- Particulate or chemical contamination risk and any proposed discharges should be set out and dilution data provided. Any destabilisation works, excavations, ground disturbance or stripping of vegetation and/or topsoil should be carried out so as to avoid pollution of the water environment.

- Sediment – resulting from operations including stockpile storage, storage of weather sensitive materials at lay-down areas, haul routes, access roads, earthworks, drainage channels, vehicle access over watercourses, construction of watercourse crossings and digging of excavations. Permanent and temporary drainage arrangements for access tracks, turbines and substation should be based on sustainable drainage principles.
• Dust Management - proposals for dust management including dust sprays. Excavation works, particularly through drilling and blasting, may cause nuisance to adjacent properties due to the generation of dust and noise.

• Concrete production/use – Environmental impacts resulting from concrete batching plant operations, use of blinding cement on roadways, wash-out during construction, poor integrity of shuttering. Discharge to waterbodies and pH impact on peatland (where relevant) should be avoided.

• Mineral oils, fuel transport and storage – Environmental impacts resulting from spillages, refuelling and burst cables. Maintenance of vehicles and plant should be carried out only on impermeable areas where any oil spillages can be contained.

• Road and crane hardstanding - Environmental impacts resulting from construction, use, and decommissioning of such infrastructure. Where tracks or hardstanding will be located on peat and will carry heavy loads, evidence will be necessary of additional consideration of specific measures required to deliver best practice should be included.

• Pollution risks and impacts on other environmental sensitivities as a result of the timing of operations.

• Welfare arrangements - Details of waste water drainage from temporary and permanent facilities for workers on site should be provided. Our preference would be for waste water and solid waste to be transported away from the site and disposed of using standard waste handling facilities during the construction period.

• Site restoration - It is good practice for large scale developments to be subject to conditions requiring the submission of a restoration and aftercare scheme.

• Environmental accident management procedures - This should include toolbox talks relating to pollution prevention.

• Site environmental management - arrangements for the appointment of an appropriately qualified and experienced environmental manager to supervise operations on site during the whole construction period.
period, and with the authority to stop work and implement remedial work with immediate effect.

- Site Waste Management Plan (SWMP) which identifies all waste streams and proposals for their management, including peat, soils and other materials excavated on site and the importation of any waste materials to the

Signed Director

K Ellis

Dated 1st October 2014