Environmental & Sustainability Commitment Document

Pave Aways Limited,
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1. POLICY STATEMENT

Pave Aways Limited recognises that construction activities can have significant impacts on the environment through the consumption of energy, water and natural resources, generation of waste, use of construction materials, transport, emissions, noise, dust, pollution risks and potential impacts on biodiversity and local communities.

As a Principal Contractor undertaking refurbishment, new-build and construction activities, Pave Aways Limited is committed to managing and reducing these impacts throughout the life cycle of our projects.

We are committed to protecting the environment, preventing pollution, reducing waste, using resources responsibly and continually improving our environmental performance.

We will comply with all applicable environmental legislation, regulatory requirements, client requirements and other environmental obligations relevant to our activities in England and Wales.

Where reasonably practicable, we will seek to exceed minimum legal requirements and adopt recognised good practice.

Our environmental and sustainability objectives are based on the principles of:

- Pollution prevention;
- Waste prevention and the waste hierarchy;
- Efficient use of energy and natural resources;
- Reduction of greenhouse gas emissions and carbon;
- Responsible sourcing and procurement;
- Reuse and recycling of materials;
- Protection of watercourses, groundwater and drainage systems;
- Protection and enhancement of biodiversity;
- Reduction of dust, noise and nuisance;
- Sustainable transport and efficient logistics;
- Consideration of whole-life environmental impacts;
- Environmental awareness and competence;
- Continual improvement.

Pave Aways Limited is committed to maintaining an effective Environmental Management System aligned with the principles and requirements of **ISO 14001**.

2. LEGAL AND REGULATORY COMPLIANCE

Pave Aways Limited will identify, monitor and comply with applicable environmental legislation and regulatory requirements.

Our environmental compliance arrangements will include, where applicable:

- Environmental Protection Act 1990;

- Environment Act 1995;
- Environmental Permitting (England and Wales) Regulations 2016;
- Waste (England and Wales) Regulations 2011;
- Hazardous Waste Regulations and associated requirements;
- Control of Pollution Act 1974;
- Clean Air Act 1993;
- Water Resources Act 1991;
- Environmental Damage (Prevention and Remediation) Regulations 2015;
- Wildlife and Countryside Act 1981;
- Conservation of Habitats and Species Regulations 2017;
- Climate Change Act 2008;
- Control of Substances Hazardous to Health Regulations 2002 where relevant to environmental controls;
- applicable planning conditions and environmental requirements;
- applicable local authority requirements;
- requirements imposed by the Environment Agency, Natural Resources Wales or other competent authorities;
- client-specific environmental and sustainability requirements.

Legislation and regulatory requirements will be monitored through the Company's legal compliance arrangements. Changes that may affect our activities will be communicated to relevant personnel and incorporated into procedures where necessary.

3. RESPONSIBILITIES

3.1 Directors and Senior Management

The Directors are responsible for demonstrating leadership and commitment to environmental protection and sustainability.

They will:

- provide appropriate resources for environmental management;
- establish environmental objectives and targets;
- ensure environmental performance is considered within business decisions;
- support continual improvement;
- ensure significant environmental risks are identified and managed;
- review environmental performance as part of management review arrangements.

3.2 Health, Safety & Environmental Manager

The Health, Safety & Environmental Manager is responsible for overseeing the Company's environmental management arrangements.

Responsibilities include:

- maintaining the Environmental Management System;
- monitoring environmental legislation and compliance;

- undertaking environmental inspections and audits;
- maintaining environmental risk and aspects registers;
- supporting project teams with environmental controls;
- investigating environmental incidents;
- monitoring environmental performance and KPIs;
- providing environmental advice and training;
- setting and reviewing environmental objectives;
- reporting environmental performance to senior management.

3.3 Contract Managers and Site Managers

Site and project management teams are responsible for implementing environmental controls on individual projects.

They will ensure that:

- project environmental risks are assessed before work starts;
- appropriate environmental controls are established;
- site personnel receive appropriate induction and information;
- waste is managed correctly;
- pollution prevention measures are implemented;
- environmental inspections are completed;
- environmental incidents are reported and investigated;
- environmental legislation, planning conditions and client requirements are followed;
- subcontractors are appropriately briefed and monitored.

3.4 Employees and Subcontractors

All employees, subcontractors and other persons working on behalf of Pave Aways Limited are required to:

- comply with this policy and project-specific environmental arrangements;
- prevent pollution wherever reasonably practicable;
- minimise waste and unnecessary consumption;
- use energy, water and materials responsibly;
- report environmental incidents, near misses and concerns;
- follow site waste segregation arrangements;
- use spill kits and pollution control equipment appropriately;
- comply with site environmental rules and instructions.

4. ENVIRONMENTAL ASPECTS AND RISK MANAGEMENT

Pave Aways Limited will identify activities that have, or could have, an environmental impact.

Environmental aspects may include:

- energy consumption;
- fuel use;
- greenhouse gas emissions;
- waste generation;
- material consumption;
- water consumption;
- transport and deliveries;
- dust and air emissions;
- noise and vibration;
- pollution of land, surface water or groundwater;
- hazardous substances;
- fuel and chemical storage;
- concrete and cement activities;
- contaminated land;
- biodiversity and ecology;
- drainage;
- site clearance;
- nuisance to neighbours and local communities.

Significant environmental aspects will be assessed and appropriate controls implemented.

Project-specific environmental risks will be managed through appropriate documentation, which may include:

- Construction Environmental Management Plans (CEMP);
- environmental risk assessments;
- environmental aspects and impacts assessments;
- site logistics plans;
- site waste management arrangements;
- pollution incident response plans;
- COSHH assessments;
- RAMS;
- inspection and monitoring arrangements.

5. POLLUTION PREVENTION

Pave Aways Limited recognises that pollution incidents are generally preventable through effective planning, supervision and control.

We will take reasonable and proportionate measures to prevent pollution of:

- land;
- surface water;
- groundwater;
- drainage systems;
- watercourses;
- air.

Pollution prevention measures will include, where applicable:

- appropriate storage of fuels, oils and chemicals;
- secondary containment and bunding;
- suitable spill kits;
- controlled refuelling arrangements;
- inspection of plant and equipment;
- controlled delivery of hazardous substances;
- protection of drains;
- silt and sediment controls;
- appropriate concrete and cement controls;
- appropriate waste storage;
- prevention of unauthorised discharge;
- emergency response arrangements.

No substance will be discharged to a watercourse, surface water drainage system, foul sewer, ground or soakaway unless the discharge is legally permitted and any required consent, permit or authorisation is in place.

6. WATERCOURSE AND DRAINAGE PROTECTION

Where a project is located close to a watercourse, drainage system or environmentally sensitive area, additional controls will be implemented.

Surface water and foul drainage systems will be identified where reasonably practicable and protected against contamination.

Materials such as:

- cement;
- concrete;
- oils;
- fuels;
- paints;
- chemicals;
- silty water;
- contaminated materials

will be prevented from entering surface water drainage systems or watercourses.

Where dewatering or discharge of water is required, the water will be appropriately assessed and treated, and any necessary permissions or consents obtained before discharge.

Silt control measures may include:

- settlement systems;
- silt fencing;

- geotextiles;
- filtration;
- controlled pumping;
- temporary drainage;
- appropriate water treatment.

7. WASTE MANAGEMENT

Pave Aways Limited is committed to reducing waste generation and applying the **waste hierarchy**:

1. Prevention;
2. Preparing for reuse;
3. Recycling;
4. Other recovery;
5. Disposal.

We will seek to prevent waste at source through effective planning, procurement, storage and material management.

Where waste cannot be avoided, we will seek to reuse or recycle it before considering recovery or disposal.

Waste will be:

- correctly classified;
- appropriately segregated;
- securely stored;
- transferred only to appropriately authorised waste carriers and facilities;
- accompanied by the appropriate waste documentation;
- monitored to identify opportunities for improvement.

Where hazardous waste is generated, it will be separately identified, stored and managed in accordance with applicable legislation.

Waste transfer notes, hazardous waste documentation, consignment notes and other required records will be retained in accordance with legal and company requirements.

Waste will not be burned or buried on site.

8. RESOURCE EFFICIENCY AND MATERIALS

Pave Aways Limited will seek to minimise the consumption of virgin and non-renewable resources.

Procurement and project planning will consider:

- durability;

- recycled content;
- recyclability;
- responsible sourcing;
- embodied carbon;
- whole-life environmental impacts;
- local availability;
- sustainable certification;
- product environmental information;
- minimisation of packaging;
- opportunities for reuse.

Where commercially, technically and contractually appropriate, we will consider products with recognised responsible sourcing or environmental credentials.

Timber will be legally sourced and, where specified or reasonably practicable, responsibly sourced using recognised certification schemes such as FSC or PEFC.

Materials will be ordered to reflect project requirements and avoid unnecessary surplus.

9. REUSE AND RECYCLING

Pave Aways Limited will actively identify opportunities to reuse existing materials and construction products.

Examples may include:

- reuse of suitable timber;
- reuse of bricks;
- reuse of temporary works materials;
- reuse of surplus materials on other projects;
- recycling of metals;
- recycling of timber;
- recycling of plasterboard;
- recycling of packaging;
- recycling of suitable inert construction materials.

Where materials are reused, their suitability will be assessed before incorporation into the works.

10. CARBON AND CLIMATE CHANGE

Pave Aways Limited recognises the importance of reducing greenhouse gas emissions associated with construction activities.

We will seek to reduce carbon emissions through:

- efficient site energy use;
- reducing unnecessary idling of plant and vehicles;
- efficient delivery planning;
- reducing unnecessary journeys;
- consideration of lower-emission vehicles and plant;
- use of energy-efficient equipment;
- responsible material selection;
- reducing material waste;
- reuse and recycling;
- consideration of embodied carbon;
- efficient temporary site accommodation;
- monitoring fuel and energy consumption where appropriate.

Where project requirements permit, we will consider lower-carbon alternatives and whole-life carbon implications when selecting materials, plant and construction methods.

Climate change risks will also be considered where relevant, including risks associated with:

- extreme rainfall;
- flooding;
- extreme temperatures;
- drought;
- severe weather;
- supply chain disruption.

11. ENERGY MANAGEMENT

Pave Aways Limited will seek to minimise unnecessary energy consumption.

Site teams will be encouraged to:

- switch off lighting and equipment when not required;
- avoid unnecessary heating or cooling;
- use energy-efficient lighting;
- maintain plant and equipment;
- minimise engine idling;
- use timers and controls where appropriate;
- monitor energy consumption where practicable.

Energy performance will be reviewed where sufficient data is available to identify opportunities for improvement.

12. WATER MANAGEMENT

Water is a valuable natural resource and Pave Aways Limited will seek to minimise unnecessary water consumption.

Measures may include:

- repairing leaks promptly;
- using water-efficient equipment;
- preventing unnecessary running of taps and hoses;
- using controlled water supplies;
- reusing water where safe and practicable;
- using alternative dust suppression methods where appropriate;
- preventing contamination of water supplies.

13. DUST AND AIR QUALITY

Pave Aways Limited will take reasonable measures to prevent or minimise dust and other emissions from construction activities.

Controls may include:

- water suppression;
- local exhaust ventilation and extraction;
- appropriate cutting methods;
- enclosure of dusty activities;
- damping down;
- covered material storage;
- covered skips and loads where appropriate;
- road and wheel cleaning;
- speed restrictions on site;
- appropriate plant maintenance.

Dust-generating activities will be assessed and controlled through project-specific risk assessments and RAMS.

14. NOISE AND VIBRATION

Pave Aways Limited recognises that construction activities can affect employees, neighbours, businesses and the wider community.

We will seek to minimise unnecessary noise and vibration by:

- planning noisy activities;
- maintaining plant and equipment;
- using quieter equipment where reasonably practicable;
- avoiding unnecessary engine idling;
- using acoustic barriers or screening where appropriate;
- controlling working hours;
- communicating with affected stakeholders where appropriate;
- complying with planning conditions and client requirements.

Particular consideration will be given to projects located near residential areas, schools, hospitals, care facilities and other noise-sensitive locations.

15. BIODIVERSITY AND ECOLOGY

Pave Aways Limited recognises its responsibility to minimise adverse impacts on biodiversity.

Where relevant to a project, ecological considerations will be identified during pre-construction planning.

Controls may include:

- protecting retained trees and vegetation;
- protecting watercourses and habitats;
- avoiding unnecessary vegetation clearance;
- complying with ecological surveys and recommendations;
- protecting nesting birds and other legally protected species;
- controlling invasive species;
- preventing pollution that could affect habitats;
- implementing ecological mitigation measures identified by competent persons.

Where projects provide opportunities for environmental enhancement, these will be considered with clients and project stakeholders.

16. CONTAMINATED LAND

Where there is a potential risk of contaminated land, historical site use and available environmental information will be reviewed.

Where contamination is suspected or encountered:

- work will be stopped or controlled where necessary;
- the material will not be unnecessarily disturbed;
- the material will be assessed by a competent person;
- appropriate testing and classification will be undertaken;
- relevant authorities and the client will be notified where required;
- contaminated materials will be handled, stored and disposed of appropriately.

17. FUEL, OIL AND CHEMICAL STORAGE

Fuel, oil and chemicals will be stored and handled in a manner designed to prevent pollution.

Where applicable:

- containers will be clearly labelled;
- suitable secondary containment will be provided;

- storage areas will be secure;
- quantities stored will be kept to the minimum reasonably required;
- incompatible substances will be appropriately segregated;
- containers will be regularly inspected;
- spill kits will be readily available;
- refuelling will be undertaken in controlled areas;
- valves and dispensing equipment will be secured when not in use.

Leaking or damaged containers will be dealt with immediately.

18. REFUELLING

Refuelling will be undertaken in designated and controlled areas wherever reasonably practicable.

Suitable precautions will include:

- drip trays;
- spill kits;
- trained personnel;
- supervision of refuelling;
- checking of containers and equipment;
- prevention of overfilling;
- appropriate separation from drains and watercourses.

Any spill or leak will be dealt with immediately in accordance with the Company's environmental emergency procedures.

19. CONCRETE, CEMENT AND WASHOUT

Concrete and cement products can present a significant pollution risk.

Pave Aways Limited will ensure that:

- concrete deliveries are appropriately controlled;
- concrete washout is undertaken only in designated areas where required;
- concrete washout water is prevented from entering drains, watercourses or the ground;
- cement products are stored appropriately;
- spills are dealt with immediately;
- contaminated materials are appropriately managed.

Concrete delivery vehicles will not be permitted to wash out into surface water drains, watercourses or uncontrolled areas.

20. SILT AND SEDIMENT CONTROL

Where construction activities expose soil or create a risk of sediment entering drainage systems or watercourses, appropriate controls will be implemented.

These may include:

- minimising exposed ground;
- appropriate stockpile positioning;
- covering or stabilising stockpiles;
- silt fencing;
- settlement areas;
- filtration;
- controlled pumping;
- temporary drainage;
- wheel washing or road cleaning.

Silty or contaminated water will not be discharged without appropriate assessment and authorisation.

21. SUSTAINABLE PROCUREMENT

Pave Aways Limited will consider environmental and sustainability factors when procuring materials, products and services.

Where practicable, procurement decisions will consider:

- environmental impact;
- embodied carbon;
- recycled content;
- responsible sourcing;
- product durability;
- recyclability;
- packaging;
- transportation;
- environmental certification;
- supplier environmental performance;
- whole-life cost and environmental impact.

Suppliers and subcontractors may be required to provide relevant environmental information and evidence of compliance.

22. SUSTAINABLE TRANSPORT AND DELIVERIES

Pave Aways Limited will seek to reduce the environmental impact associated with transport and logistics.

Measures may include:

- delivery consolidation;

- efficient route planning;
- reducing unnecessary journeys;
- preventing vehicle idling;
- maintaining vehicles and plant;
- considering lower-emission vehicles and plant;
- coordinating deliveries;
- sourcing suitable materials locally where commercially and technically appropriate.

Site logistics will be planned to reduce congestion, unnecessary vehicle movements and associated emissions.

23. ENVIRONMENTAL INCIDENTS AND EMERGENCIES

All environmental incidents must be reported immediately to the Site Manager or other responsible person.

Examples include:

- fuel or oil spills;
- chemical spills;
- pollution of drains or watercourses;
- uncontrolled discharge;
- discovery of contaminated land;
- significant dust emissions;
- uncontrolled waste release;
- damage to protected habitats or ecological features.

The immediate priority will be to:

1. Stop the source where safe to do so;
2. Prevent further spread;
3. Protect drains and watercourses;
4. Use appropriate spill or pollution control equipment;
5. Notify the Site Manager;
6. Notify the Health, Safety & Environmental Manager;
7. Notify the client and other relevant parties where required;
8. Contact the appropriate regulatory authority where required;
9. Arrange appropriate clean-up and waste disposal;
10. Investigate the incident and implement corrective action.

Environmental emergency arrangements will be communicated during site induction and through relevant toolbox talks and training.

24. ENVIRONMENTAL TRAINING AND AWARENESS

Pave Aways Limited will ensure that employees and relevant subcontractors receive environmental information and training appropriate to their responsibilities.

Environmental awareness may include:

- site environmental induction;
- waste segregation;
- pollution prevention;
- spill response;
- protection of drains and watercourses;
- dust and noise control;
- biodiversity;
- efficient use of materials;
- energy and water conservation;
- environmental emergency procedures.

Additional training will be provided where specific environmental risks or responsibilities require it.

25. MONITORING, INSPECTION AND AUDIT

Environmental performance will be monitored through proportionate inspection, auditing and review arrangements.

Monitoring may include:

- environmental site inspections;
- internal audits;
- waste data;
- recycling rates;
- fuel consumption;
- energy consumption;
- water consumption;
- environmental incidents;
- environmental near misses;
- pollution events;
- environmental complaints;
- material usage;
- project-specific environmental targets.

Findings will be recorded and corrective actions assigned where necessary.

Trends will be reviewed to identify opportunities for continual improvement.

26. ENVIRONMENTAL OBJECTIVES AND KPIs

Pave Aways Limited will establish environmental objectives and targets that are appropriate to the Company's activities and significant environmental aspects.

Objectives may include:

- reducing waste generated per project;
- increasing reuse and recycling;
- reducing waste sent for disposal;
- reducing fuel consumption;
- reducing unnecessary vehicle movements;
- reducing energy consumption;
- reducing water consumption;
- reducing environmental incidents;
- improving environmental awareness and training;
- increasing responsible sourcing;
- reducing carbon emissions;
- improving environmental performance of suppliers and subcontractors.

Objectives will be reviewed periodically and amended where necessary.

27. SUBCONTRACTORS AND SUPPLIERS

Pave Aways Limited expects subcontractors, suppliers and other relevant business partners working on our behalf to comply with applicable environmental legislation and project-specific environmental requirements.

Subcontractors may be subject to:

- pre-qualification checks;
- environmental competence checks;
- review of relevant accreditations;
- provision of waste documentation;
- environmental inspections;
- audits;
- site briefings;
- performance monitoring.

Poor environmental performance may result in corrective action or further review of the supplier or subcontractor.

28. COMMUNITY AND STAKEHOLDER RESPONSIBILITY

Pave Aways Limited recognises that construction activities can affect local communities.

We will seek to minimise:

- unnecessary noise;
- dust;
- mud on public roads;
- traffic disruption;
- visual nuisance;
- litter;
- pollution;

- unreasonable disturbance.

Where appropriate, project teams will communicate with clients, neighbours, local authorities and other stakeholders regarding significant environmental matters.

Environmental complaints will be recorded, investigated and addressed appropriately.

29. DOCUMENTATION AND RECORD KEEPING

Appropriate environmental records will be maintained, including where applicable:

- environmental risk assessments;
- environmental aspects registers;
- CEMPs;
- waste transfer notes;
- hazardous waste consignment notes;
- waste carrier and facility information;
- environmental inspection records;
- audit reports;
- environmental incident reports;
- training records;
- environmental monitoring results;
- environmental objectives and KPI data;
- supplier environmental information.

Records will be retained in accordance with legal, contractual and company requirements.

30. CONTINUAL IMPROVEMENT

Pave Aways Limited is committed to continually improving its environmental performance.

Improvement opportunities will be identified through:

- environmental inspections;
- audits;
- incident investigations;
- management reviews;
- employee feedback;
- client feedback;
- changes in legislation;
- changes in technology;
- environmental performance data;
- lessons learned from projects;
- review of environmental objectives and targets.

The Company's Environmental Management System will be reviewed to ensure it remains suitable, effective and proportionate to the Company's activities and environmental risks.

31. POLICY REVIEW

This policy will be reviewed at least annually and sooner where necessary following:

- significant changes to legislation;
- changes to Company activities;
- significant environmental incidents;
- changes to environmental risks;
- changes to client or contractual requirements;
- changes to ISO 14001 requirements;
- findings from audits or management reviews.

The latest approved version of this policy will be communicated to relevant employees and made available to interested parties where appropriate.

32. MANAGEMENT COMMITMENT

Pave Aways Limited's Directors are committed to providing the leadership, resources and support necessary to implement this Environmental and Sustainability Policy.

Every employee and person working on behalf of Pave Aways Limited has a responsibility to contribute towards environmental protection and sustainable construction.

Signed by Mr. Steven Owen
Managing Director



Dated; 03/09/26
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