

Policy - Rail

Title: Sustainability Policy

ASH Construction Group aims to follow and to promote good sustainability practices to reduce the social, economic and environmental impacts of all our activities and to help our clients and partners to do the same.

This policy sets out how ASH Construction Group will achieve this aim, and how we will promote sustainability within every aspect of the company, our staff and associates.

1. **Equal Opportunities and Diversity.** ASH Construction Group has a Personnel and Equal Opportunities Policy in place and is committed to treating all job applicants and employees fairly and equally and to promote diversity and good practices in this area in order to reduce the likelihood of discrimination or harassment occurring. The policy applies to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment. It applies to job applicants (both internal and external) and all workers whether full time, part time, casual, temporary, and seasonal or contract. The policy also applies to the treatment of our clients, associates and suppliers.
 - a. **Monitoring and reporting diversity:** ASH Construction Group monitor and report diversity using our internal systems which requires all employees and job applicants to complete a form denoting their sex, race, ethnic origin, age and any disabilities that they have. The composition of the workforce and of job applicants is monitored on a regular basis
 - b. **Employment and training:** ASH Construction Group have established a team of highly skilled, professional and experienced staff and consultants to identify and manage our employment and training requirements. We will source locally first where possible.
2. **Labour Standards - Supply Chain.** ASH Construction Group will deliver our services and projects using our own highly qualified staff. Should ASH Construction Group require the use of any external subcontractors or professional advisors for specific work outside our own competence, we will ensure there is no risk to our clients' ethics and labour standards. We can provide our clients with relevant information (nature of subcontractor, type of contract and terms and conditions, length of contract, etc) to demonstrate compliance with client's standards and expectations.
3. **Environmental Risks.** ASH Construction Group have carried out a preliminary environmental risk assessment for our services. Once a contract is awarded and there is a clearer scope of works, timelines and deliverables, we will finalise the assessment for each of the activities planned and we will review the assessment at agreed intervals.
 - a. The risks identified include:
 - i. Low risk of disturbance of hibernating species (bats) during October to April months (for structures examination activities);
 - ii. Low risk of impact to habitat of voles, otters and / or nesting river birds if access is via watercourse.
 - iii. Possible contact with invasive species such as Giant Hogweed or Japanese Knotweed;
 - iv. Low risk of nuisance from operating generators and mechanised plant and low risk of fuel spill from plant.
 - v. Risk of disturbance to river flora and fauna (voles, otters, crayfish, newts, nesting birds etc.) in the case of diving and underwater examinations.

b. Mitigation measures to ensure minimal risk include:

- i. Our staff will be fully briefed on the results of any ecological reports highlighting presence of protected and invasive species in the area and will follow relevant procedures including: specific prior assessment of impact if protected site; work to be undertaken in specific season, consideration of alternative methods of work; prevention of spread of invasive species, disposal of waste)
- ii. Our staff are experienced and have had training and access to professional advice regarding protected species and working around them, and the risk of spreading invasive species. If an unexpected discovery of protected / invasive species occurs then it will be reported immediately and species will be protected until further guidance is received from the client or relevant authority;
- iii. No vegetation will be cleared unless agreed by the relevant client representative or authority;
- iv. We will minimise disruption through site visits and work by careful planning and appropriate awareness of potential habitats and any other sensitive environmental aspects of the site.

c. Monitor and control of measures. ASH Construction Group is committed to our clients' biodiversity and ecology principles as well as our own policy to high standards of environmental protection. We will monitor any of our environmental impacts on site to ensure appropriate controls are in place. In the unlikely event of environmental damage or nuisance we will immediately inform the relevant client representative and authority as required and conform to relevant incident response procedures.

4. **Carbon Emissions.** ASH Construction Group is committed through our Environmental Policy and specific environmental plans to comply and contribute to clients' goals and carbon reduction targets, to use energy efficient plant/equipment and to maintain plant for energy efficiency.

- a. Our estimation of energy consumption most projects are limited to: fuel for any plant/equipment used; and fuel use for staff travel to site (indirect). In order to demonstrate that we are providing an energy efficient service which is compliant with clients' sustainability principles we will monitor and report and at agreed intervals throughout the project the following information: number of sites visited, number of visits required per site, and CO2 equivalent of fuel used either by plant/machinery or by staff travel.
- b. Our energy reduction contribution will be based around our policy of using equipment only when necessary and strictly for the minimum length of time necessary (including our premise of not leaving plant running unnecessarily). With regards to staff travel we actively promote good vehicle maintenance, vehicle sharing and good planning of site visits (to avoid unnecessary trips).

5. **Ecological Conservation.** We operate a policy of minimal disturbance, awareness of the environmental issues around the area and efficient and carefully planned examinations (so that all information is gathered with as few visits as possible). Refer to section 3 for more detail on risks to the environment and mitigation measures. ASH Construction Group will ensure any opportunities which staff become aware of during our works and site visits are communicated to the relevant client representatives for further investigation and action. ASH Construction Group is open to agreements with clients regarding actions to enhance ecology/habitat.

The achievement of the objectives and the effectiveness of our integrated management system will be monitored through a programme of planned audits and will be reviewed by the Board of Directors.



Policy Review and Availability

A review of our policies will be carried out at least annually and also when there are significant changes to ASH Construction Group.

This policy is available to all ASH Construction Group staff and is available to other interested parties upon request.

Signed: 

Position: HSQE Director

Dated: 27/06/2025