

1. Purpose & scope

This policy applies to all Greatway T&C operations including rail track maintenance, environmental works, infrastructure support and supply chain activities throughout the UK. It establishes the operational environmental management framework that all employees, contractors, subcontractors, and suppliers must follow on all Greatway T&C projects and premises.

All subcontractors and suppliers working on Greatway T&C projects are required to comply with this policy and demonstrate adequate environmental management competence as a condition of engagement.

2. Environmental aspects & impact

In accordance with ISO 14001, Greatway T&C maintains an Environmental Aspects & Impacts Register identifying the significant environmental aspects of our operations. The register is reviewed annually by the Environmental Lead and updated whenever there is a significant change in our activities, products, services, or operating conditions.

In accordance with ISO 14001:2015 Clause 7.2, Greatway T&C ensures all relevant staff are competent to manage environmental risks in their role.

3. Operational environmental controls

3.1 Waste Management

All waste is managed in accordance with the waste hierarchy: Reduce, Reuse, Recycle, Recover - landfill is the last resort. Waste transfer notes must be obtained from all licensed waste carriers and retained for a minimum of 2 years. Hazardous waste consignment notes must be retained for a minimum of 3 years. Waste volumes and recycling rates are recorded per project and reported annually.

3.2 Air quality & dust

A dust management plan is required for all projects involving excavation, demolition, or track renewal. Water suppression, screening, and covered loads must be used where required to control dust. All plant and vehicles must be maintained and regularly serviced to minimise exhaust emissions. Plant must not be left idling unnecessarily - a maximum idling time of 3 minutes applies to all diesel plant and vehicles.

3.3 Noise & vibration

All works must comply with BS 5228 - a Noise & Vibration Management Plan (NVMP) is required for all notifiable works. The noisiest and highest-vibration activities must be scheduled within agreed working hours wherever operationally possible. Noise monitoring must be conducted adjacent to sensitive receptors where required. All noise and vibration complaints must be recorded and responded to where appropriate.

3.4 Nature recovery plan

Ecological surveys must be conducted before any works in areas where protected species or habitats may be present.

All works must comply with the Wildlife & Countryside Act 1981, Habitats Regulations 2017, and Network Rail biodiversity requirements. Biosecurity measures must be implemented on all sites to prevent the spread of invasive species - particularly Japanese Knotweed and Himalayan Balsam. No vegetation clearance is permitted during bird nesting season (March to August inclusive) without a prior nesting bird survey confirming the area is clear. All projects must target biodiversity net gain (BNG) in accordance with the Environment Act 2021.

3.5 Climate change adaptation

The Company recognises that climate change may present environmental and operational challenges, including extreme weather and changing environmental conditions. While the organisation does not currently operate a formal climate change adaptation plan, we aim to consider environmental risks when planning and carrying out our activities. The Company will seek to minimise environmental impact by promoting responsible operational practices, efficient use of resources and ongoing awareness of environmental factors. As the organisation develops, opportunities to further strengthen climate resilience and sustainability practices will be reviewed.

3.6 Zero waste energy

The Company is committed to promoting responsible use of materials, energy and other resources within its operations. We aim to minimise waste generation wherever reasonably practicable and encourage efficient use of resources across all activities. Employees and contractors are encouraged to adopt environmentally responsible behaviours, including reducing unnecessary consumption and supporting responsible waste management practices. The Company will continue to review opportunities to improve efficiency and reduce waste as the business develops.

3.7 Carbon reduction commitment

The Company acknowledges the importance of reducing greenhouse gas emissions and aims to minimise the carbon impact of its operations where reasonably practicable. This includes promoting efficient use of fuel and resources, encouraging responsible operational practices and considering environmental performance when planning activities. As the organisation grows, the Company will continue to review opportunities to improve energy efficiency and reduce carbon emissions associated with its operations.

4. Environmental incident management

Any environmental incident, near-miss or spill must be reported immediately. The following procedure applies:

Step 1 - Immediate Response

Stop the activity causing the incident, make the area safe - ensure personal safety first. Contain the incident where safe to do so - deploy spill kit, use barriers, close drains. Do not attempt clean-up activities that could spread contamination.

Step 2 - Immediate Notification

Report immediately to the Site Manager and Environmental Lead (Director). If a watercourse, groundwater source, or public drain is or may be affected: report immediately to the Environment Agency on 0800 80 70 60 (24hr). If a protected species or habitat is harmed: report to Natural England (0300 060 3900) and Network Rail Environmental team. Do not attempt to conceal or minimise any environmental incident.

Step 3 - Recording & Investigation

Record the incident in the Environmental Incident Log within 24 hours — including date, time, location, nature of incident, immediate actions taken, and parties notified. The Environmental Lead conducts a root cause investigation within 5 working days. Corrective and preventive actions are documented, assigned, and tracked to completion. Lessons learned are communicated to relevant staff via toolbox talk or briefing within 10 working days of the investigation conclusion. All environmental incidents are reviewed quarterly by the Director as part of the management review process.

5. Internal audits & management review

Internal Environmental Audits (ISO 14001 Clause 9.2)

Internal environmental audits are conducted at least annually across Greatway T&C operations and a sample of active project sites. Audits assess compliance with this policy and ISO 14001 requirements. Audit findings are reported to the Director and any non-conformances are assigned corrective actions with a defined timescale.

6. Document control and record retention

This policy is reviewed annually and following any significant environmental incident, legislative change, or material change to business operations. The current version of this policy is held by the Environmental Lead and communicated to all staff on issue. Waste transfer notes (2 years); Hazardous waste consignment notes (3 years); Environmental). All records are made available for RISQS pre-qualification, ISO 14001 audit, and regulatory inspection on request. RISQS audit evidence pack is maintained by the Environmental Lead and reviewed annually before RISQS renewal.

Authorisation

I confirm this policy has been reviewed, approved and is effective from 2026.

Rickson Chivunga

Director, Greatway T&C