Environmental Policy on Construction Sites of Inplag sp. z o.o.

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Version 03

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The purpose of **the Environmental Policy on Construction Sites** is to define the rules for minimising the negative impact of construction activities on the environment, with taking into account current legal regulations, the Investor's/Client's guidelines and good practices in the field of sustainable construction.

Commitment

INPLAG Sp. z o.o., as a contractor carrying out construction investments in the industrial, manufacturing, logistics, residential and service sectors, undertakes to:

1. Comply with legal regulations on environmental protection and carry out the investment process in a manner that prevents negative environmental impacts by selecting optimal solutions in line with the principles of sustainable construction.
2. Strive to implement the solutions consistent with the principles of circular economy (CE).
3. Promote the use of technologies and materials that meet the requirements of sustainable procurement, in compliance with the Sustainable Procurement Policy of INPLAG.
4. Limit pollutant emissions and manage resources rationally.
5. Support the achievement of environmental objectives through responsible planning and implementation of investments.

INPLAG takes a responsible approach to environmental protection issues.

I. Company environmental goals

1.

Protecting the environment through constant reduction of negative impact of the enterprise on the natural environment.

2.

Using

- materials
- energy
- water
- gas

in a rational manner.

3.

Reducing the emission of pollutants to the environment.

4.

Using and promoting ecological solutions.

II. Protecting the environment on construction sites

Key construction practices related to the environmental protection on construction sites:

1. Implementing the Construction Waste Management Plans (both own plans of INPLAG and those developed by Clients / Investors / General Contractor) aimed at reducing the amount of construction waste and operating in compliance with the effective law.
2. Undertaking measures to reduce the emissions generated during construction works, including noise, exhaust fumes, water and soil pollution, through the use of modern technologies, appropriate safeguards and proper monitoring of the construction process.
3. Ensuring high standards of health and safety for Employees/Workers and Associates through the implementation of the procedures and standards in the area of Safety and Health at Work, training and continuous monitoring of working conditions.
4. Respecting the needs of local residents and protecting the local fauna and flora by limiting the nuisance caused by the works.

III. Minimising the impact of construction works on the natural environment

In order to limit the negative impact of the investment on the natural environment, the Contractor is required to carry out construction works in a sustainable and responsible manner by:

1. Using an effective construction waste management system, with taking into account the waste management hierarchy (promoting waste prevention, preparation for reuse, recycling, other recovery processes, transfer for disposal).
2. Maintaining cleanliness and order on the construction site, of which removing the waste regularly and avoiding **the spread of waste outside the designated collection area.**
3. Arranging and marking the parking spaces for employees'/workers' and visitors' vehicles in a manner that does not interfere with public space or the natural environment.
4. Arranging the access routes for transport vehicles and enforcing their use, with taking into account the minimisation of nuisance to the local community and the protection of nature.
5. Limiting health risks for Employees/Workers by ensuring safe and hygienic working conditions, appropriate personal protective equipment and ongoing supervision of compliance with the regulations and procedures in the scope of the Health and Safety at Work.
6. Preventing the entry and spread of pollutants into water and soil during construction by

using appropriate technical safeguards, proper storage of hazardous substances prior to their transfer for disposal, and immediate response to environmental incidents.

IV. Managing the construction waste

The Contractor is required to manage waste in compliance with applicable regulations and the principles of sustainable development.

In particular:

- At the stage of preparation for the performance of works, it is required to determine the method of construction and municipal waste management, as well as the rules of cooperation with the entities specialising in waste collection and disposal.
- Where possible, the Contractor takes measures to reduce the amount of generated waste, through making arrangements with the suppliers in the scope of the rules for the return of reusable packaging (pallets, spacers, transport containers, reels), and other measures.
- The entire waste management process shall be documented and monitored, and the persons responsible for its implementation shall be appropriately trained.

4.1. Measures to reduce the stream of landfilled waste

In order to minimise the amount of landfilled construction waste, the following practices should be implemented at each stage of the construction process:

1. **At the design stage:**
    - using the solutions that reduce losses in material, ensuring the appropriate selection of systems (prefabricated elements, accurate measurements).
2. **At the construction stage:**
    - **Prefabrication –** using the prefabricated elements delivered from prefabrication plants, which reduces the amount of waste generated during traditional assembly work.
    - **Preparation of materials to size –** it is preferred to cut the materials to size at the production stage (if cutting on site is necessary, it should only be done in designated areas).
    - **Use of returnable packaging,** elimination of unnecessary protective layers, reduction of the use of adhesives, tapes, films and labels to the necessary minimum.

- **Optimisation of purchasing process –** ordering the building materials in an optimal manner, i.e. in quantities based on actual demand, placing orders with local suppliers whenever possible.
- **Selective collection or segregation –** collecting the waste selectively and directly on the construction site (in situ) or outside it (out situ), in compliance with the applicable legal regulations and the requirements imposed by the waste collectors.

3. **After completion of construction:**
    - Transferring the materials remaining after construction for reuse.
    - The Waste Management Plans will include the estimates of the quantities of waste that will be generated after completion of the works, which will be then compared with the actual final data. The purpose of this analysis is to identify the trends and to optimise the construction and procurement processes in future projects.

4.2. Control and supervision of waste disposal services

1. Before signing a waste collection contract, the Site Management is responsible for checking whether the prospective Service Provide has the required authorisations to carry out waste collection, management, disposal and out-situ segregation. In particular, it should be verified whether they have an active Waste Database Number (BDO, from Polish *Baza Danych o Odpadach*) and the relevant administrative decisions issued by the local authorities.
2. The Contractor is responsible for preparing and submitting the reports on waste management, which reports are required by law.
3. The quality and effectiveness of the selective waste collection on the construction site should be regularly monitored, through internal audits and other measures.
4. All Subcontractors are required to comply with the Waste Management Plan developed for a given investment project and should act in accordance with its provisions.
5. Municipal waste generated on the construction site should be collected and transferred on the basis of a separate agreement concluded with an entity holding relevant authorisation in accordance with the local guidelines.
6. Before the commencement of the construction works, it is required to provide the training for employees/workers, associates and subcontractors which covers the principles of proper waste segregation, presentation of environmental aspects relevant to a given investment project, as well as the provisions of this Policy and the Sustainable Procurement Policy, and other internal regulations.

4.3. Reducing the negative impact on the natural environment

The following acts are strictly prohibited on the construction site:

- introducing the hazardous waste other than that specified in the relevant permits;
- mixing different types of hazardous waste;
- contaminating the environment, of which soil and water, groundwater, through uncontrolled waste storage;
- storing waste outside the areas designated and secured for this purpose;
- washing vehicles and construction equipment with the use of chemicals in places not designated for this purpose;
- burning waste in any manner;
- discharging hazardous substances into the sewage system/watercourses;
- storing motor fuel/petroleum-derived substances in unsuitable, uncertified or leaking containers without safety features.

V. Keeping the construction site clean

During the preparation of the construction site, it is required to define and mark the boundaries of the following zones in the Construction Site Development Plan:

- parking, communication routes and access roads;
- location of construction containers;
- delivery, collection and removal of waste;
- storage of construction materials and waste.

Cleanliness on the construction site should be maintained regularly, based on a schedule and agreements with providers of such services. Containers and functional facilities should be cleaned regularly (both inside and outside), and access roads, pedestrian routes and work areas should be kept tidy. It is required to ensure clear signage and physical demarcation of zones in accordance with the Construction Management Plan.

The place for smoking tobacco products should be:

- specially designated;
- enclosed on 3 sides, protected from the weather (roofed);
- marked and located away from flammable materials and work areas.

Example of construction site organisation:

AREA FOR STORAGE OF CONSTRUCTION MATERIALS

Construction site
IT IS OBLIGATORY TO USE:

SAFETY HELMETS

HIGH VISIBILITY VESTS

PROTECTIVE GLOVES

PROTECTIVE FOOTWEAR

AUTHORISED PERSONNEL ONLY

VI. Parking the cars by construction employees/workers

It is necessary to do the following to ensure the efficient traffic organisation:

1. Provide a sufficient number of parking spaces near the construction site and keep access to the construction site and facilities clean and passable.
2. Limit the possible traffic disruptions on nearby roads, in particular by planning the logistics of deliveries and passenger vehicle traffic.
3. Enable smooth access for both passenger cars and delivery vehicles in a manner that does not disrupt public order and road safety.
4. Designate waiting areas for heavy goods vehicles to avoid blocking public roads – this space should be sufficiently large and safe.
5. Strive to prepare and implement a plan for the distribution and management of construction materials on the construction site.
6. Inform the companies responsible for deliveries and logistics about the applicable environmental rules and the requirements for the organisation of transport on the construction site.

VII. Providing the information to construction personnel

The construction personnel should be informed about the environmental aspects during the initial training held before the start of construction works. The subcontractors should

familiarise themselves with the following documents: the Environmental Policy on Construction Sites, the Sustainable Procurement Plan, the Waste Management Plan, and other documents related to the environmental protection applicable on a given construction site.

VIII. Reducing the health risks for employees/workers associated with products and materials

In order to reduce the health risks associated with the use of chemicals and construction materials, the Contractor should implement the following precautions:

1. Materials and products used on the construction site should be carefully selected, with taking into account their impact on human health and the environment.
2. All hazardous substances must have Safety Data Sheets which should be available in the construction documentation and made available to the personnel by the Site Management.
3. Before using a hazardous substance, it is required to carry out a risk analysis and to determine the required personal protective equipment such as protective gloves, goggles, masks, overalls.
4. The use of asbestos and asbestos-containing materials is strictly prohibited throughout the entire investment process.
5. The Contractor should seek the Investor's approval for the materials used in the construction process.

IX. Reducing the pollution of water and soil

In order to protect groundwater, the Contractor and the Subcontractors are required to:

1. After removing the topsoil (humus) – properly secure and temporarily store it in piles no higher than 3 m, in a manner that limits leaching and erosion.
2. If possible – store construction materials on wooden pallets covered with plastic film to limit the contact with the ground and prevent its pollution.
3. Store building materials in a manner preventing the adverse effects on fauna and flora.
4. Avoid the use of asbestos and asbestos-containing materials at all costs.
5. Use water-based products or products with a low solvent content.
6. Avoid, as far as possible, the use of products containing lead as hardening agents or drying accelerators.
7. Implement a proper waste management policy and thus prevent accidental release of waste into the soil or groundwater.
8. Where technically feasible – drain surface water from the construction site to a temporary rainwater retention tank.

X. Reducing the consumption of water

Caring for the rational water management, the Contractor and the Subcontractors are required to:

1. Discharge sewage from the construction site facilities to the sewage system with the use of a permanent, leak-proof and certified sewage tank adapted to sewage collection which must be emptied regularly by the appropriate services.
2. Use water rationally.
3. Close valves and taps thoroughly after drawing water.
4. Immediately repair any leakages and leaks in the water and sewage systems.
5. Inform the Site Management of any faults/leaks noticed.
6. Place the information materials encouraging the employees/workers to save water in visible places – the Site Engineer's office and in the construction site facilities.
7. Install water meters.
8. Appoint a person responsible for the ongoing monitoring and recording of water consumption.
9. Consider the possibility of using rainwater for technical purposes, e.g. for washing equipment or reusing it in the system.
10. Prevent the negative effects of spills of oil derivatives and other hazardous substances by providing an "ecological first aid kit" (emergency kit for neutralising spills) on the construction site.
11. Report the environmental incidents immediately and remove their effects without delay.

XI. Reducing the consumption of electricity and lighting

In order to reduce the electricity consumption and indirect emissions associated with its production, the Contractor and the Subcontractors are required to:

1. Temporarily disconnect the power supply to office containers and technical facilities after work, unless this affects safety.
2. Use energy-efficient computer and office equipment.
3. Use energy-efficient light sources (LED).
4. Equip the workstations with power strips with switches enabling the complete disconnection of devices from the mains after work.
5. Place the information materials encouraging the employees to save energy in visible places, including the Site Engineer's office and the construction site facilities.
6. Equip each room with radiators with thermostats.
7. Promote the use of energy-efficient appliances (A, A+, A++).
8. Use downward-directed lighting to reduce light pollution.

9. Instruct the operators of machinery, equipment and transport vehicles on the obligation to switch them off when not in use.
10. Appoint a person responsible for monitoring and recording of electricity consumption on the construction site.
11. Analyse the possibilities and cost-effectiveness of using renewable energy sources on the construction site and in the construction site facilities.

XII. Reducing the noise emission

In order to ensure the comfort of local residents and the safety and health of employees/workers on the construction site, the Contractor and the Subcontractors are required to:

1. Comply with the ban on playing the radio and music on the construction site.
2. Select the construction equipment appropriately in terms of noise generation and use it in a manner that minimises noise emissions.
3. Plan the use of noise-generating equipment at times when the noise will be least bothersome to local residents.
4. Analyse the possibility of using an increased/double number of devices in order to shorten the time required for particularly noisy work.
5. Refrain from carrying out noisy construction work between 10 p.m. and 6 a.m. as far as possible.
6. Provide the employees/workers with access to hearing protection (e.g. ear defenders) when noise levels exceed 85dB and enforce their use.
7. Organise the deliveries of materials and equipment to the construction site outside the rush hours (if possible) to reduce noise and traffic disruptions.

XIII. Reducing the emissions of dust and mud

In order to limit dust and mud emissions that may adversely affect air quality, road condition and the comfort of local residents, the Contractor and the Subcontractors are required to:

1. Maintain the internal roads for delivery vehicles in good condition to reduce pollution of surrounding roads.
2. Moisten the roads and traffic routes on the construction site with water during dry periods to prevent dust from rising.
3. Organise cleaning with the use of mechanical equipment (e.g. road sweepers) when the public roads are soiled.
4. Use closed silos for storing particularly dusty materials and load loose materials with particular care to reduce dust.

5. Cover the load boxes of vehicles transporting loose materials (if possible).
6. Observe the prohibition of leaving vehicles with the engine running while stationary.
7. Store materials in closed and windproof storage areas (where possible).
8. Reduce the emissions of pollutants and odours into the air.
9. Use the grinders equipped with a dust extraction system (e.g. industrial vacuum cleaners) when processing wood, concrete and other dusty materials.
10. Regularly and thoroughly clean the construction site facilities and areas where construction and municipal waste is stored and removed to prevent the emission of unpleasant odours and maintain high standards of hygiene.

XIV. Reducing the harmful effects of vibrations

In order to reduce the negative impact of mechanical vibrations on the environment, neighbouring structures and the health of employees/workers, the Contractor and the Subcontractors are required to:

1. Use the alternative methods for performing vibration-generating works – instead of hydraulic hammers, it is recommended to use cutting machines, bending machines or other low-vibration technologies.
2. Plan the works in such a way as to minimise the exposure of the environment to vibrations.
3. Use the personal protective equipment (anti-vibration gloves, work breaks, task rotation).

XV. Protecting the fauna and flora

In order to preserve the local natural values, the Contractor and the Subcontractor are required to carry out the works with respect for the existing fauna and flora, based on the guidelines contained in the industry documentation, including, where applicable, the environmental decisions and reports by a qualified ecologist. It is required to avoid the unjustified interference with green areas and natural habitats of animals and plants.

The activities should be carried out in accordance with the guidelines of the personnel qualified in the field of ecology, and in the absence of guidelines – the activities should be adapted to the specific nature of the location and other industry guidelines, as well as current conditions and legal provisions, with taking into account the principles of sustainable development.

XVI. Actions after completion of construction

After completion of construction, the Contractor and the Subcontractors are required to clean and tidy up the site where the works were carried out: remove the unnecessary materials, waste, temporary infrastructure, technical fences and tree protection. It is required to check for soil or other environmental contamination – if any is found, it is required to take immediate remedial action.

XVII. Informing the local communities

In order to maintain good communication with the local community and minimise the conflicts, it is required to provide written information about the construction schedule, planned disruptions and potential nuisances to the residents and users of the areas adjacent to the investment site. It is required to install a legible information board at the main entrance to the construction site concerning the construction and the expected completion dates of each stage of works. The communications addressed to the local communities should be understandable, up-to-date and accessible.

XVIII. Subcontracting

The environmental requirements set out in this Policy also apply to Subcontractors performing works on behalf of INPLAG. The Subcontractors are required to familiarise themselves with the applicable Environmental Policy on Construction Sites, the Sustainable Procurement Plan, the Waste Management Plan and other environmental documents applicable on a given construction site, and to strictly comply with the rules contained therein.

XIX. Control and supervision within the adopted procedures

In order to avoid emergencies, accidents and incidents that could have a negative impact on the environment, it is advisable to identify the environmental aspects of the construction site in advance, analyse them and prepare the preventive measures.

In the event of an environmental accident, it is required to immediately undertake the following activities:

1. Secure the area.
2. Take appropriate measures to neutralise and remove contamination.
3. Immediately inform the Environmental Management Representative or a person designated by them and submit a completed environmental incident report in accordance with the internal procedures.

XX. Responsibility

The person responsible for supervising the compliance with the provisions of this Policy on a given construction site is the Works Manager.

The Management Board of INPLAG Sp. z o.o.