

MWH Treatment Limited

SUSTAINABILITY AND ENVIRONMENTAL MANAGEMENT MANUAL

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	<i>Issue / amendment details</i>	<i>Reviewed by</i>	<i>Authorised by</i>
Review	Revision 10 March 2026	C. Price	S. Cox
	<i>Minor changes: CE responsibility signing MS statement; SMWMP into continual improvement</i>		
	<i>Significant changes: Management meetings</i>		

NOTE:

1. This Manual may be revised from time to time. The current issue is available on IFS and the company intranet.
2. This manual is the property of MWH Treatment Limited and is confidential. It must not be copied or lent to a third party without prior permission from a SHEQ Manager or a Director.

Revision History

Issue	Date	Amendments / Comments
Manual transferred to Integrated Management System as MA02		
1	Oct 2015	Update to format, minor changes throughout document and include reference to the Integrated Management System (IMS).
2	May 2016	Update to incorporate W2E O&M, management review process and Global Environment and Social Responsibility Policy
3	Sept 2017	Update to include handling of media attention; Director responsible for SHEQ signing policy statements; reference to MWHT, removed reference to Districts and added Framework
4	Mar 2018	Update to reflect ISO14001:2015. New continual improvement section; added life cycle approach; leadership section; general ISO updates; Interim Director resp. for SHEQ; management of change process
5	Mar 2019	Rebranding to MWHT. Statement included on standard emergency plans.
6	Aug 2023	General update following RSK acquisition and organisational changes
7	Sept 2024	Update to include sustainability and responsible business, ISO Net Zero Guidelines requirements and general updates.
8	Nov 2024	Update to include new sections on 'Engagement and Collaboration' and 'Reporting'. Incorporated PAS2080 references and carbon management responsibilities.
9	Mar 2025	Minor change to social value definition, incorporating updated National TOMs Themes and RSK social value reporting requirement
10	Feb 2026	Minor changes: CE responsibility signing MS statement; MS statement onto government registry; CRSD compliance; SMWMP into continual improvement. Significant change to management groups – to include new Business Leadership Team and Group; Divisional meetings; Sustainability Champions.

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1 INTRODUCTION

1.1 Scope

The Sustainability and Environmental Management Manual defines the sustainability strategic approach, sustainability and environmental policies, the structure and responsibilities for MWH Treatment Limited. The Manual describes the management arrangements adopted to ensure the company's activities are carried out in accordance with business needs, and the requirements of ISO14001 for the scope of work defined in the MWH Treatment IMS Scope (SYRE/1646055).

Joint ventures and overseas projects may operate to ISO14001 where specified but will, as a minimum, implement systems to prevent pollution, adhere to compliance obligations and stipulated MWH Treatment requirements.

The scope of the system applied to each of MWH Treatment's Joint Ventures, Alliance Partners or Business Areas can be seen in MWH Treatment's IMS Scope (SYRE/1646055). This is available to interested parties upon request.

This Sustainability and Environmental Management Manual is intended to provide employees, clients and others, with an explanation of the arrangements operated by MWH Treatment in relation to the sustainability and environmental element of the IMS and ISO14001:2015 requirements. In addition, Design Build Sustainability and Carbon Management Manual (MA12) provides details on the adoption of PAS2080 Carbon Management in Buildings and Infrastructure Standard.

All employees of MWH Treatment are required to implement the Sustainability, Responsible Business and Environmental Policies through adherence to the principles and practices defined by the Sustainability and Environmental Management Manual, Company Processes and Procedures, Environmental Management Plans and other IMS documentation.

1.2 Intended outcome of the Environmental Management System

For MWH Treatment the intended outcomes of implementing an EMS (as part of the Integrated Management System – IMS) are:

- Alignment with company strategy
- Identifying, managing and mitigating environmental risks to prevent pollution, to minimise environmental harm and to fulfil the company's compliance obligations
- Operation of an effective EMS with demonstrable continual improvement

1.3 Issue and control of the Sustainability and Environmental Management Manual

The Sustainability and Environmental Management Manual is prepared by the Head of Sustainability and Environment and authorised for use by the SHEQ Director. The controlled document will be held on IFS, and on the company intranet, where it will be accessible for all employees. The document becomes uncontrolled when printed. The Manual may be communicated externally, at the discretion of the Head of Sustainability and Environment, Head of SHEQ or a Director.

1.4 Review of the Manual

The Manual is revised as necessary and re-authorised by the SHEQ Director prior to use.

The Manual is subject to an annual review by management and will be revised and re-issued accordingly. Any comments must be submitted to the Head of Sustainability and Environment.

2 SUSTAINABILITY AND ENVIRONMENTAL RELATED POLICIES

The latest revision of the MWH Treatment Environmental Policy Statement is made available to all employees on notice boards, virtual notice boards, on IFS (Doc No: MP/1334958), on the company intranet and on the company external website.

The MWH Sustainability and Responsible Business related Policies are made available to all employees via the MWHT website and the company intranet.

3 ORGANISATIONAL STRUCTURE

MWH Treatment Limited is an operating business within the RSK Group, as part of their Smart Futures Division. MWH Treatment operate its own Integrated Management System and SHEQ and Sustainability organisational structure with the incorporation of specific RSK requirements (where material to the business). The MWH Treatment organisational structure for SHEQ and Sustainability management, is illustrated by SYGD01-04 MWH Treatment Organisation Chart, SYGD01-18 SHEQ and Sustainability Organisational Structure and BPPD06-02 MWHT Environment and Sustainability Organisation Chart.

4 MWH TREATMENT VISION, PURPOSE, VALUES AND STRATEGIC PRIORITIES

4.1 Our Vision

To be the leading, trusted sustainable solution provider in the UK Water Industry.

4.2 Our Purpose

Our work makes a positive difference to the environment, our people, our clients, their customers and the communities we live in and serve, by creating a safer, sustainable future. As a responsible business it is not just about what we do, it's about how we behave and how we live our values through our people, demonstrating our wider social commitment through our work, will help us 'Shape a Better World'.

We create an environment that enables our people to flourish, bring their best to work, trusting and supporting them to develop and deliver, with a sense of belonging and common purpose.

4.3 Our Values

Safe, Well and Sustainable

- To deliver work safely and sustainably, while making a positive difference to our people, the environment, our clients and the communities we serve and live in.
- Keeping safe, looking out for each other and maintaining an Injury Free Environment (IFE).
- Working and collaborating with clients, partners and supply chain who share our safety, environmental and quality commitments for excellence.
- Focusing on wellbeing and mental health, by ensuring we support our people to maintain a work / life harmony so they can always bring their best.
- Providing affordable, low carbon and nature-based solutions to secure a long-term future with our clients.

Trust, Integrity and Respect

- We build trust, providing transparent interactions, professional, resilient, high-quality solutions, for our clients, that underpin our proud heritage.
- We are uncompromising in our ethical behaviour, acting with fairness, integrity and making the right decisions, even though they may be tough.
- We are one team, respecting and valuing strength from individual's diversity, experiences and ideas, rallying around a common purpose.
- Our people learn from each other and are supported via development to be the best they can be, because we trust them.

Connected and Innovative

- Collaborating across our business and our supply chain, we leverage collective expertise for our clients, their customers and communities we serve.
- By continuously innovating, improving our delivery and solutions, because what we do together matters, we find solutions and commit to driven delivery, achieving results for our stakeholders.
- Technology will remain at the heart of our delivery, as a facilitator of connectivity and efficiency.

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4.4 MWHT Strategic Business Priorities

MWHT strategic priorities are determined on an annual basis by the Chief Executive and consultation with the Business Leadership Group. For FY2026 the following MWHT strategic priorities (Figure 1) include 6. Being a Sustainable and Responsible Business. These priorities are communicated at the annual company Roadshows, undertaken in all regions. The SHEQ and Sustainability Objectives and Targets are aligned with the business Strategic Priorities (SYRE02-01 SHEQ Objectives and Targets).



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Figure 1: MWH Treatment FY2026 Strategic Priorities

4.5 Sustainable Development Goals

The United Nations [Sustainable Development Goals \(SDGs\)](#) are a collection of 17 interlinked objectives designed to serve as a “shared blueprint for peace and prosperity for people and the planet, now and into the future”. They were adopted by world leaders in 2015, with a purpose to provide a pathway towards achieving sustainable development by 2030. The SDGs (Figure 2: UN Sustainable Development Goals) address key challenges such as inequality, environmental degradation and climate change.

The SDGs provide a global framework for achieving a sustainable future. MWH Treatment, as a business has a responsibility to implement the SDGs as they align with [our purpose](#) to be a ‘sustainable solution provider’ and [our vision](#) in ‘creating a safer, sustainable future’.

SUSTAINABLE DEVELOPMENT GOALS



Figure 2: UN Sustainable Development Goals

RSK, the MWHT parent company, are using the SDGs to guide the business approach and help shape internal practices. This includes the group’s sustainability strategy, Second Nature, which drives the diversity of client offerings and are considered during acquisitions. For the purchase of MWHT in 2021, consideration was made to MWHT’s principal business focus in the water sector to support the achievement of SDG 6 Clean Water and Sanitation.

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MWHT Values and the UN Sustainable Development Goals



Figure 3: MWHT Values alignment with the UN Sustainable Development Goals

MWHT have reviewed all 17 SDGs – all have some relevance to business activities and stakeholder engagement however six SDGs have been highlighted to have specific relevance to our business values. These have been incorporated into our Sustainable and Responsible Business approach (see section 6) and our objectives and targets. Refer to Figure 3: MWHT Values alignment with the UN Sustainable Development Goals for alignment with the company values.

5 CONTEXT OF THE ORGANISATION

Determining the context of the organisation ensures alignment of the quality, safety, sustainability and environmental policies, objectives and implementation of the IMS with the strategic direction of MWH Treatment. This is determined by following the process BPPD08 Determining Organisational Context, Risk and Opportunity which considers, and reviews, the following with regards to the activities of MWH Treatment:

- External and internal issues relevant to the company purpose and that may affect its ability to achieve the intended outcomes (section 1.2) of the sustainability and environmental element of the IMS. These are identified in various ways e.g. Business Leadership Group; PESTLE (Political, Economic, Social, Technological, Legal, Environmental / Ethical) and SWOT (Strengths, Weaknesses, Opportunities and Threats) Workshops; a Materiality Assessment; and the RSK TCFD (Task Force on Climate-Related Financial Disclosures) climate related risks and opportunities.
- Needs and expectations of interested parties (stakeholders) and identifying the related compliance obligations through stakeholder analysis.
- Scope of the sustainability and environmental element of the IMS (SYRE/1646055) by considering:
 - External and internal issues
 - Compliance obligations
 - Organisational units, functions and physical boundaries
 - Activities, products and services
 - Authority and ability to exercise control and influence
 - Business strategy and strategic priorities
 - Potential impacts of climate change

5.1 Materiality Assessment

Materiality is about pinpointing what matters most to our business and to our most important stakeholders; what the business has the most impact on; and what impacts the business the most. Material issues are those that are identified as a priority for the organisation. A Materiality Assessment is undertaken to support decision makers on where to focus business efforts, particularly with regards to growth, development and resources. The assessment is based upon the importance given by MWHT stakeholders. Those areas material to the business are priorities considered in the development of the Sustainability and Responsible Business Route Map to 2030.

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The recent Materiality Assessment was completed in 2023 which included a review of the MWHT Stakeholder Interest / Influence Matrix, an MWHT employee survey, a Supply Chain Survey, a desk top review of clients approaches, and internal proxy interviews held with those working with specific stakeholders. Scoring was made against key Sustainability and Responsible Business topics (agreed with support from Business in the Community, Purpose and Values consultant) using the BITC materiality spreadsheet template (adapted for MWHT purposes) - BPRE08-04 Materiality Assessment Workbook. This was reviewed by MWHT Senior Leadership Group representatives, with a material priorities list for external purposes (

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Figure 4) and an internal materiality graph developed (Figure 5).

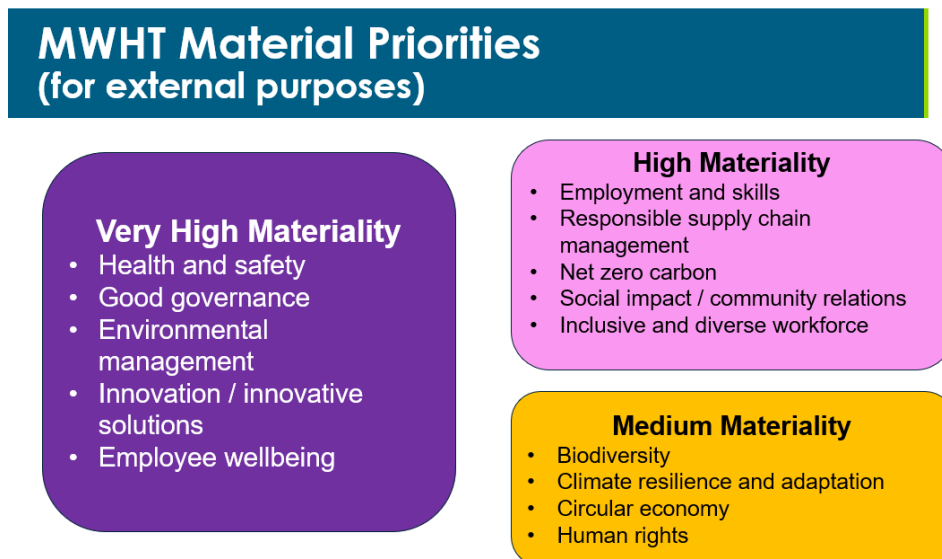


Figure 4: MWHT Material Priorities (for external purposes)

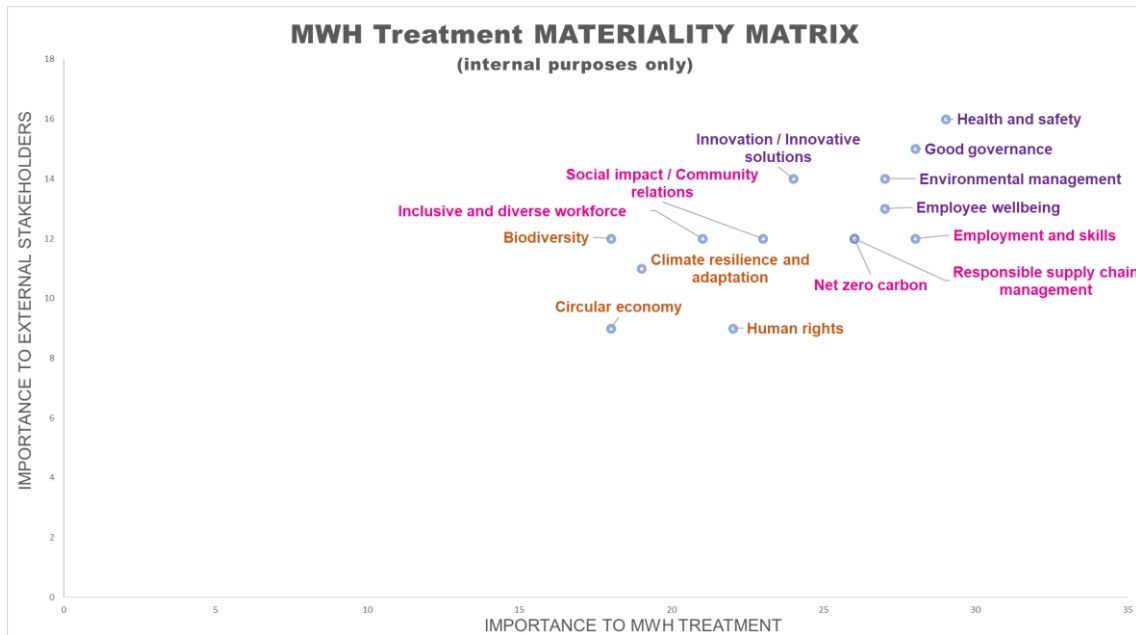


Figure 5: MWHT Materiality Matrix (for internal purposes)

6 MWHT SUSTAINABLE AND RESPONSIBLE BUSINESS APPROACH

“As a responsible business our work makes a positive difference to the environment, our people, our clients, their customers and the communities we serve and live in, by creating a safe, sustainable future.”

6.1 Sustainable and Responsible Business Approach

The MWHT Sustainable and Responsible Business approach supports our Vision, Purpose and Values. It has been developed in line with the context of the organisation and the materiality assessment results. The approach identifies seven key areas that align with our business activities (refer to Figure 6). The sustainability strategic priorities and the desired impact (through objectives and targets) will be established and reviewed / updated on an annual basis. Refer to Section 8.3.5 on Objectives, Targets and Action Plans. For details on how the Sustainable and Responsible Business approach aligns across the organisation – refer to guidance BPGD06-01 Sustainability Approach for MWHT Way Workstreams.

The MWHT Sustainable and Responsible Business approach is further supported by additional manuals and plans, where deemed necessary. These include:

- MA03 Health and Safety Policy Manual
- MA01 Quality Management Manual
- MA10 MWH Treatment Net Zero Strategy to 2045 – Manual
- MA12 Design Build Sustainability and Carbon Management Manual covering sustainability and carbon management in construction projects and compliance with PAS2080: 2023 Carbon Management in Infrastructure Standard

- People Plan (managed by Human Resources)
- MA13 Human Rights and Anti-Slavery Manual (in development)
- MA08 Business Continuity Plan
- MA11 Digital Business Continuity Plan

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Figure 6: MWHT Sustainable and Responsible Business Approach Key Areas

6.2 Social Value Approach

*“Social Value is the value an organisation contributes to society beyond a reported profit”
 (definition - Social Value Portal, 2023).*

Social value is where MWH Treatment look beyond the financial cost of a contract to consider how the services we commission and procure, and our activities, can improve the economic, social and environmental wellbeing of an area. As a business, social value is incorporated within our Sustainability and Responsible Business approach (as detailed in this Manual), and as part of the Integrated Management System. This ensures that social value is part of business as usual and demonstrates our commitment to achieving social value collaboration of MWHT with society (including the client, our supply chain and the local community), improving the community, economy and environment around our activities and locations. The National TOMs

(Themes, Outcomes and Measures) which has been adopted by MWHT is based upon 4 areas:

- Community – Outcomes: Building resilient communities; Building community wellbeing
- Economy – Outcomes: Building diverse and sustainable supply chains; Promote a diverse and resilient business community
- Work – Outcomes: Create local and equal employment opportunities; Provide and develop skills and experience
- Planet – Outcomes: Restore our climate and improve air quality through decarbonisation and transport; Promote environmentally sustainable procurement; Protect and restore biodiversity and ecosystems; Reduce plastic usage.

Social value for MWHT goes beyond community engagement and charitable donations by incorporating carbon reduction, local employment, apprenticeships, STEM educational activities, wellbeing, diversity and inclusion training, modern slavery initiatives, biodiversity net gain and waste reuse.

For calculating social value impact, MWHT use the National TOMs calculator and Thrive (through RSK). These social value calculators provide a monetary value for relevant sustainability related activities.

6.3 Design Build Sustainability and PAS2080 Requirements

From a Design Build Sustainability perspective, the following are MWHT requirements:

- Effective leadership
- Maximising opportunities for sustainability considerations at all stages of the delivery process
- Adoption of PSFR03-09 Project Sustainability and Social Value Plans, for projects within criteria (refer to PS03 Tender Preparation process)
- Setting appropriate sustainability outcomes, creation of social value and targets for projects
- Establishing metrics (e.g. Key Performance Indicators) for sustainability monitoring and reporting
- Integrating sustainability considerations into procurement and commercial decision making
- Continual improvement of sustainability performance

PAS2080 requirements, are structured around:

- Effective leadership
- Adoption of the decarbonization principles
- Maximising opportunities for whole life carbon reductions at all stages of the delivery process

- Selecting appropriate carbon (greenhouse gas) emissions assessment methodologies
- Setting appropriate carbon reduction targets
- Determining baselines against which to assess carbon reductions
- Establishing metrics (e.g. Key Performance Indicators) for credible carbon emissions monitoring and reporting
- Integrating carbon management into procurement
- Continual improvement of carbon management and performance

For further details on implementation of design build requirements refer to MA12 Design Build Sustainability and Carbon Management Manual.

7 LEADERSHIP AND RESPONSIBILITIES

7.1 All employees and those working on MWHT's behalf

All employees shall maintain an awareness of the sustainability and environmental implications of their work. They have a responsibility for ensuring that this is carried out in such a manner as to minimise environmental impact.

To achieve Net Zero carbon as an organisation, all employees need to take responsibility to reduce GHG (carbon) emissions in their day-to-day activities and in decision making (refer to MA10 MWHT Net Zero Strategy to 2045).

For sustainability and carbon management within design and build projects, specific roles have responsibility to make appropriate considerations have been defined – refer to MA12 Design Build Sustainability and Carbon Management Manual and The MWHT Way. An overview is provided in MA12 'Implementing Appropriate Governance' section 4.4.

7.2 Top Management

Top management are required to demonstrate leadership and commitment with respect to the sustainability and environmental elements of the IMS by:

- Taking accountability for the effectiveness of the IMS
- Ensuring that the sustainability and environmental policies and objectives are established and are compatible with the strategic direction and the context of the organisation
- Ensuring the integration of sustainability and environmental requirements (including social value) into the organisation's business processes
- Ensuring that the resources needed for the sustainability and environmental activities (including social value) are available

-
- Communicating the importance of effective sustainability and environmental management and of conforming to the IMS requirements
 - Ensuring that the IMS achieves its intended outcomes
 - Directing and supporting persons to contribute to the effectiveness of the IMS
 - Promoting continual improvement
 - Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

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7.2.1 Leadership Commitment for achieving Net Zero by 2045

MWHT's ambition to be Net Zero by 2045 (including supply chain) strategy (MA10 Manual) is in alignment with the ISO Net Zero Guidelines (IWA 42:2022(E)). To comply with these guidelines there are leadership commitment requirements which are stated below.

Our leadership are to ensure alignment between policies and actions, including public policy and advocacy, and the commitment is not undermined by conflicting targets. MWHT leadership are to demonstrate commitment to net zero and the principles, as stated within MA10 MWH Treatment Net Zero Strategy to 2045 – Manual, by¹:

- Providing strategic direction, oversight, support and sufficient resources to set and achieve targets.
- Incorporating net zero targets into governance documented information (e.g. charters and company processes).
- Publicly committing to achieve targets through communication by the highest level of leadership.
- Clearly defining leadership responsibilities.
- Appointing competent members of the organisation's leadership to take responsibility for actions.
- Ensuring competent persons are appointed to relevant roles and determining the frequency of updates to leadership on climate-related issues and progress towards targets.
- Implementing incentives for delivering net zero targets.
- Ensuring prioritisation of the consideration of actions needed to transition to net zero.
- Publicly and regularly communicating transition plans and progress.

Refer to MA10 MWH Treatment Net Zero Strategy to 2045 – Manual with regards to the leadership setting of Roles and Responsibilities for achieving Net Zero.

7.2.3 RSK

As the MWHT parent company, RSK are responsible for the following:

- Provision of an RSK Sustainability Strategy, for MWHT to adopt the material areas, including the setting of RSK ESG (Environment, Social and Governance) objectives and targets.
- Providing carbon Science Based Targets, approved by the Science Based Targets Initiative, for incorporation into MWHT's targets and objectives.
- Reporting on TCFD (Task Force on Climate-Related Financial Disclosures) climate related risks and opportunities, as part of the RSK annual Sustainability

¹ Adapted from ISO Net Zero Guidelines (IWA 42:2022(E)) Clause 7.2

Report. This is incorporated into MWHT's BPRE08-03 Business Risk and Opportunity Register.

- Producing an RSK annual Sustainability Report.

7.2.4 Chief Executive

The Chief Executive has overall responsibility for the performance of MWH Treatment Ltd and is responsible for:

- Ensuring that full commitment is given to the implementation of the Sustainability and Environmental policies.
- Allowing adequate resources, including human, specialised skills, organisational infrastructure, technological and financial, for implementation of the environmental policies to the ISO14001 standard.
- To provide support for the business in further development of its Sustainability and Responsible Business credentials and improvements.
- Championing our commitment to Net Zero and approval of targets and carbon ambitions.
- Ensuring MWHT set and report to RSK (parent company), on agreed RSK ESG objectives and targets.
- Signing of the annual Modern Slavery Transparency Statement on behalf of the Board of Directors.

7.2.5 Directors

Directors are responsible for establishing, implementing and maintaining the Sustainability and Environmental Policies, Objectives and Targets (which are to be compatible with the strategic direction and context of the organisation). Top management responsibilities from ISO14001:2015 are stated in the 'Top Management' subheading above and additional responsibilities are stated below for:

- Ensuring that sustainability and environmental management related processes are developed and implemented for all areas of the business, within the regions and Joint Ventures.
- Ensuring the availability of adequate resources to allow implementation of the environmental element of the Integrated Management System (IMS) and sustainability requirements, including training, and to achieve continual improvement.
- Approval of derogations from Company processes and procedures.
- Carrying out Management Reviews to monitor and report on performance against the sustainability and environmental objectives and targets, and to determine the effectiveness of the IMS.
- Responsibility for appointing the Site Safety and Environmental Supervisor.
- Undertaking senior management inspections which includes reviewing construction site's sustainability and environmental performance.
- Ensuring that the environmental element of the IMS conforms to the requirements of ISO14001:2015.

7.2.6 SHEQ Director

The SHEQ Director is responsible for the following and the 'Top Management' responsibilities as stated in ISO14001:2015 (see section 7.2):

- Establishing, implementing and maintaining the Sustainability and Environmental Policies.
- Approval of the Sustainability and Environmental Manual and associated Objectives and Targets (SYRE02-01 SHEQ Objectives and Targets; BPRE06-03 Sustainability Dashboard).
- Ensuring the SHEQ and Sustainability Department has sufficient resources, to implement the Integrated Management System within all areas of the business.
- Ensuring sustainability and environmental considerations are included in management meetings and in project / site management.
- Reporting to the Chief Executive on performance of the IMS.

7.2.7 Regional or Framework Business Managers or Directors / Departmental Managers (Engineering) / Operations Managers

Regional / Framework Business, Departmental, Operations and General Managers are responsible for the following and the 'Top Management' responsibilities as stated in ISO14001:2015 (see beginning of section 7.2) and:

- Ensuring that their departments and projects implement the requirements of the IMS.
- Taking accountability for sustainability and environmental management (including social value) in their areas of responsibility.
- Ensuring that adequate resources are available for sustainability and environmental management, including social value.
- Implementing corrective actions following an environmental incident (or Improve It) or identification of a problem area and assessing the effectiveness of such actions.
- Ensuring compliance with the BPFR06-04 Framework Sustainability and Carbon Management Plan and adequate resources are available for its adoption.
- Ensuring that the Environmental Management Plans for the various areas of the business, including projects, offices and operational plant are prepared and implemented with appropriate control measures in place.
- Delivery of continual improvement when related to activities.
- Communication on the importance of environmental management and being a Sustainable and Responsible Business.
- Providing support for teams and departments to apply environmental control measures and sustainability and environmental improvements.
- For Operations Managers: Ensuring compliance with the Construction Site Carbon Requirements and the energy supply hierarchy; and adoption of the Site Carbon Smart Toolkit.

- Ensuring central SHEQ and Sustainability Team are provided with reporting on site related sustainability and social value activities (including carbon requirements, community engagement and charitable spend).

7.3 Operational Roles

7.3.1 Business Development, Proposal Managers and Engineers, Pre-Contract Engineers

Proposals related roles are responsible for:

- Ensuring that consideration is given to sustainability and environmental matters at the tender stage and sufficient allowances are included, to enable the resulting issues to be effectively managed without incident. This should include compliance with the Construction Site Carbon Requirements (where applicable).
- Ensuring sustainability, carbon and social value are considered for each project during the Risk Call process.
- Ensuring that environmental considerations are incorporated into the tender so that potential impacts are avoided or minimised.
- Ensuring that Environmental Management Plans for proposals are prepared, where required.
- Ensuring Project Sustainability and Social Value Plans are adopted, where the project complies with the set criteria (refer to PSPD03-01 Tender Preparation).
- Agreeing project carbon baselines with the client, where required, and in compliance with the PAS2080 standard where specified. Considerations for the identification of carbon reduction and circular economy opportunities.
- Ensuring commencement of the PSFR03-11 Design Build Sustainability and Carbon Checklist, where appropriate for the project.

7.3.3 Project Managers (construction)

Project Managers are responsible for:

- Ensuring that the sustainability related, and environmental management processes and procedures are implemented on their project, including applying control measures, inspections and reviews.
- Ensuring Environmental Management Plans and Site Material and Waste Management Plans are in place prior to the start of construction and implemented throughout the project.
- Setting of sustainability and carbon related objectives and targets (in alignment with client requirements), ensuring project carbon is calculated (where required - compliance with PAS2080 standard where specified) and assisting in the identification of carbon reduction and circular economy opportunities.
- Ensuring that relevant sustainability and environmental considerations are included in the selection of subcontractors, and that their work is carried out in accordance with good environmental practice.

- Ensuring that relevant environmental considerations, carbon reductions and sustainability requirements are included in the scheduling of the works to prevent delays and/or incidents.
- Ensuring initiation of the Project Sustainability and Social Value Plan, where required for the project as per set criteria (refer to PSPD03-01 Tender Preparation). Promoting the creation of social value within the project.
- Ensuring continued development of the PSFR03-11 Design Build Sustainability and Carbon Checklist, where appropriate for the project.
- Ensuring compliance with the Construction Site Carbon Requirements and the energy supply hierarchy; and adoption of the Site Carbon Smart Toolkit.
- Ensuring the reporting of site related sustainability and social value activities (including carbon requirements, community engagement and charitable spend) on ActivSHEQ, or other regional requirement.
- Facilitating the obtaining of sustainability data and specifications from supplier tenders (e.g. Environmental Product Declarations / Life Cycle Assessments) and taking these into consideration when selecting suppliers (in collaboration with procurement, commercial and design).

7.3.4 Site Managers (construction sites)

The Site Managers have overall responsibility for environmental matters on site and are responsible for:

- Complying with the requirements of the Environmental Management Plan (EMP) and implementing good environmental practices on site. To update the EMP, when necessary and inform the project Environmental Advisor of significant changes on site likely to affect environmental issues.
- Incorporating environmental control measures into appropriate Risk Assessments and Method Statements.
- Delegation of environmental responsibilities, as appropriate, to persons competent to carry out such tasks, including inspections and monitoring.
- Ensuring contractors and visitors are instructed on the relevant site-specific environmental risks.
- Ensuring that the site waste management arrangements are in compliance with legislation and company policy.
- Updating of the Site Material and Waste Management Plans and other environmental data submissions for monthly reporting via ActivSHEQ.
- Ensuring adequate supplies of environmental control equipment (e.g. spill response) are available and appropriately used.
- Supporting the development of the Project Sustainability and Social Value Plan, where required for the project as per set criteria (refer to PSPD03-01 Tender Preparation).
- Compliance with the Construction Site Carbon Requirements and the energy supply hierarchy; and adoption of the Site Carbon Smart Toolkit.

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- Ensuring low carbon decision making with regards to plant, tools, site accommodation and construction activities including energy, water, resource efficiency and waste minimisation.
- Undertaking sustainability and environmental toolbox talks and briefings appropriate to the works taking place.
- Ensuring that subcontractors, working under MWH Treatment control, carry out activities in accordance with good environmental practice.
- Ensuring that relevant environmental considerations are included in both MWH Treatment and Subcontractor Safe Systems of Work.
- Prompt reporting of Improve Its, incidents and regulatory visits on ActivSHEQ, or other regional requirements.
- Empowering contractors and visitors to report Improve Its and to identify any environmental and sustainability related concerns on site.
- Reporting of site related sustainability and social value activities (including carbon requirements, community engagement and charitable spend) on ActivSHEQ, or other regional requirement.

7.3.5 Designers

Designers have an overall responsibility to ensure that their designs incorporate environmental and sustainability considerations so that potential impacts are avoided or minimised.

A Designer also has the following environmental and sustainability responsibilities:

- Ensure during the review process that avoidance or mitigation of environmental and sustainability impacts are considered, and potential improvements identified.
- For Projects where an Environmental Impact Assessment (EIA) or Environmental Statement (ES) has been produced or is already included in the Scope of Work, ensure identified design related mitigation measures are incorporated into the project.
- Contributing to the setting and achievement of sustainability and carbon related objectives and targets (in alignment with client requirements).
- Supporting the adoption of the Project Sustainability and Social Value Plan, where required for the project as per set criteria (refer to PSPD03-01 Tender Preparation).
- Calculating project carbon (where required - compliance with PAS2080 standard where specified).
- Continued development of the PSFR03-11 Design Build Sustainability and Carbon Checklist, where appropriate for the project.
- Lean design and value engineering to incorporate review of circular economy options, carbon reduction measures (compliance with the carbon hierarchy), waste minimisation and the use of alternative products / materials with lower embodied carbon.
- Provide information at design stage, for incorporation into Site Material and Waste Management Plans.

- Facilitating the obtaining of sustainability data and specifications from supplier tenders (e.g. Environmental Product Declarations / Life Cycle Assessments) and taking these into consideration when selecting suppliers (in collaboration with procurement, commercial and project management).
- Identifying other potential areas to enhance environmental and / or sustainability elements on projects they are involved in.
- Consult an Environmental Advisor where there are any environmental or sustainability related queries.

7.3.6 Project Engineers

Project Engineers are responsible for:

- Ensuring that the sustainability related, and environmental management processes and procedures are implemented on their project.

7.3.7 Field Survey Staff (Survey Services)

Field Survey Staff are responsible for:

- Having sustainability and carbon management awareness and consideration within job role.
- Complying with the requirements of the Environmental Management Plan (EMP).
- Implementing good practices on site and demonstrating awareness of environmental considerations relevant to their activities.
- Completing any relevant / required environmental training modules.
- Reporting any environmental problems or issues to Management and raise Improve Its where necessary.

7.3.8 Spares

- To have sustainability and carbon management awareness and consideration within job role.
- Obtain data / sustainability specifications from suppliers.
- To use transportation services with high sustainability credentials (e.g. carbon neutral commitment).

7.3.9 Office Manager / Plant Manager / Site Safety and Environmental Supervisors

The person with direct responsibility for an office or other work location, e.g. Office Manager / Administrator or Site Safety and Environmental Supervisor, is responsible for overseeing implementation of the sustainability related and environmental processes and procedures in their area, e.g. office, operational treatment plant or construction site. They are responsible for:

- Ensuring that the work on site, or in the work location, is carried out in accordance with the Environmental Management Plan (EMP) and good environmental practices. To update the EMP, when necessary.
- Ensuring that office and site-based personnel (including subcontractors' operatives) are aware of their sustainability and environmental responsibilities through induction training, toolbox talks and instructions as appropriate.
- Ensuring the adoption of sustainability related measures, including energy efficiency, waste minimisation and promotion of the Green Travel Plans.
- Carrying out routine environmental inspections of the offices, works or construction sites.
- Reporting sustainability and environmental Improve its and incidents and seeking advice on sustainability and environmental issues.
- Reporting on social value related activities (e.g. on ActivSHEQ) including charitable donations, volunteering and STEM activities.
- Ensuring that the waste management arrangements are in compliance with legislation and company policy.

7.3.10 Procurement and Commercial

Procurement and Commercial Teams are responsible for:

- Embedding sustainability and carbon supply chain requirements into procurement processes and subcontracts.
- Ensuring that high sustainability and environmental risk sub-contractors and suppliers are assessed through the Subcontractor and Supplier Assessment as per PMPD05-01. The Sustainability and Environmental Team will be consulted, where appropriate.
- To support the adoption of PAS2080 standard, particularly with regards to procurement specific expectations (refer to MA12 Design Build Sustainability and Carbon Management Manual clause [section] 10). This includes in supporting the identification and development of carbon reduction and circular economy opportunities within the supply chain.
- Ensuring sustainability and environmental considerations are incorporated into nationwide framework tenders, with sufficient weighting in the decision making.
- Ensuring sustainability and environmental considerations are incorporated into supplier engagement as appropriate i.e. with regards to PPE providers, stationary suppliers and waste management.
- For Procurement - supporting the identification of alternative low carbon fuels, for plant and equipment, as technology develops.
- To provide representation and support regarding the Anti-Slavery Working Group.
- Obtaining of sustainability data and specifications from supplier tenders (e.g. Environmental Product Declarations / Life Cycle Assessments) and taking these into consideration when selecting suppliers.

- To support the partnership with Supply Chain Sustainability School and assist in embedding within MWHT and adoption by the supply chain, including use of the Action Sustainability carbon tool.

7.3.11 Human Resources

- To incorporate sustainability and net zero carbon requirements into HR policies and processes, as necessary. This includes training provision through Learning and Development Team.
- To develop and continually improve on the MWHT diversity and inclusion approach.
- To provide representation and support regarding the Anti-Slavery Working Group.
- To provide employee benefits in line with being a Sustainable and Responsible Business e.g. agile working, Employee Assistance Programme and cycle to work scheme.
- To ensure the completion of all right to work checks for MWHT employees.

7.3.12 Fleet

- To provide fleet data to the Sustainability and Environmental Team for carbon footprinting and analysis.
- To influence driver behaviour through use of tools and training, to minimise fuel use.
- To eliminate petrol and diesel engines from fleet and car hires and the identification of alternative low carbon fuels, as technology develops.

7.3.13 Finance

- To provide the necessary carbon data to the Sustainability and Environmental team for calculations.
- To report as per financial regulatory requirements (i.e. SECR – Streamlined Energy and Carbon Reporting).
- To provide support on budget for net zero carbon initiatives, innovation and removal of residual emissions.
- To provide ethics and compliance – community / charitable approvals as part of Project Sustainability and Social Value Plans.
- To undertake checks on bank accounts for duplicate addresses (with regards to the anti-slavery approach).
- To undertake checks on the provision of the Real Living Wage for all MWHT employees.

7.3.14 Information Technology and Systems

- Selection of tools to consider sustainability and carbon management (i.e. cloud services, equipment hires).
- When selecting suppliers, obtain and assess appropriate sustainability documents (e.g. Environmental Product Declarations / Life Cycle Assessments), in consultation with the Sustainability and Environmental Team.
- Supplier engagement to incorporate sustainability and carbon management.

7.4 SHEQ and Sustainability Roles

7.4.1 SHEQ Director

Refer to 7.2 Top Management section.

7.4.2 Head of Sustainability and Environment

The Head of Sustainability and Environment, as assigned by the Chief Executive and SHEQ Director, is responsible for the following and the 'Top Management' responsibilities as stated in ISO14001:2015 (see section 7.2):

- Ensuring that the sustainability, responsible business, environmental management and social value elements of the IMS are developed and maintained in accordance with the requirements of ISO 14001:2015. This includes development of the Sustainability and Environmental Management Manual, processes and procedures; updating registers for compliance obligations, effects and consents; producing relevant forms; maintaining the audit programme; updating the company intranet.
- Development of sustainability and environmental related business strategies.
- Representing sustainability, environmental and social value matters on the wider Business Leadership Group.
- Providing specialist sustainability and environmental advice, technical support, and guidance throughout the business.
- Identify opportunities for continual improvement and management implementation through the IMS.
- Reporting to the Directors and Managers on the performance of the sustainability related and environmental elements of the IMS, including incidents, Improve Its, audit findings, corrective actions, other problem areas identified and improvements.
- Analysing, reviewing and reporting on sustainability, environmental and social value related data for internal and external requirements (including the MWHT Sustainability Dashboard and compliance with the Global Reporting Initiative).
- Decide the requirements of environmental investigations when environmental incidents and Improve Its are reported.
- Checking of derogations from company processes.
- Development of the Sustainability, Responsible Business and Environmental related Policy Statements.

- Management of the relevant action plans - Sustainability and Responsible Business; Environmental Action Plan; Net Zero; Communications. Reporting on progress, resource requirements and IMS effectiveness to the Business Leadership Group (BLG).
- Supporting the adoption of PAS2080 standard within The MWHT Way.
- Completion of external sustainability assessments and compliance with RSK requirements (including reporting).
- Ensuring that suitable environmental and sustainability briefings, and training are given to all relevant personnel, and records are maintained.
- Investigating ideas for sustainability and environmental improvements and best practice for incorporating into the IMS.
- Reporting to the Head of SHEQ, Director (responsible for SHEQ) and the SHEQ Executive Committee (where appropriate) on the performance of the sustainability and environmental management elements of the IMS.
- Delegating activities and providing guidance to Sustainability and Environmental Team and across the business.
- Collaborating with Joint Ventures with the sharing of best practice and reviewing JV performance.
- Working with sustainability related external stakeholders including Supply Chain Sustainability School, Business in the Community and Slave Free Alliance.
- Leading on the Supply Chain Sustainability School partnership and account management.

7.4.3 Head of SHEQ

The Head of SHEQ is responsible for the following and the 'Top Management' responsibilities as stated in ISO14001:2015 (see section 7.2):

- Leading the SHEQ Governance Team.
- Consultation with the Business Leadership Group to manage SHEQ within the business.
- Ensure standardisation and consistency of the IMS across all business Functions, Districts and Regions, managing appropriate derogation and client requirements.
- Work alongside our Joint Venture partners, clients and Supply Chain to raise standards and deliver efficiencies.
- Consultation with the MWHT wider global SHEQ community to capture best practice and implement initiatives.
- Planning and implementing change including identifying needs, training requirements, information resources and measurement of effectiveness.

7.4.4 Regional Environmental Managers and Environmental Leads

The Regional Environmental Managers and assigned Environmental Leads (e.g. designated Senior Environmental Advisor) are responsible for the following:

- To deputise for the Head of Sustainability and Environment, where requested.
- Providing specialist environmental advice, technical support, and guidance throughout the business.
- Identify opportunities for continual improvement and best practice, including potential incorporation into the IMS.
- Support the Head of Sustainability and Environment in the sustainability approach for MWHT, including net zero carbon, Biodiversity Net Gain, waste minimisation and other related areas.
- Ensuring the preparation of Environmental Management Plans for the various areas of the business including projects, proposals, and facility management.
- Carrying out environmental and sustainability audits and inspections of business activities, sites and offices to ensure the IMS is operating correctly in line with MWHT Treatment's processes, procedures and compliance obligations, ensuring control measures are implemented and effective.
- Carrying out audits and inspections on the supply chain, as deemed necessary due to sustainability and environmental risks.
- Maintenance of ActivSHEQ environmental reporting requirements, identifying opportunities for continual improvement, waste management reporting trends, and carbon and social value reporting.
- Reviewing Risk Assessments, Method Statements and other documentation as required, to ensure sufficient environmental content and consideration for activities with specific environmental risks and/or requirements.
- Decide the requirements of environmental investigations when environmental incidents and Improve Its are reported, in consultation with the Head of Sustainability and Environment.
- Maintenance and continual development of sustainability related and environmental documentation relating to the IMS, including compliance obligations.
- Determining regional requirements for briefings and training.
- Producing and delivering required training, including those as directed by the Head of Sustainability and Environment.
- Undertaking supplier assessments, as directed by the Head of Sustainability and Environment, including environmental consultants, waste management and recycled aggregates.
- Delegating activities and providing guidance to the Sustainability and Environmental Team.
- Collaborating with Joint Ventures with the sharing of best practice and reviewing JV performance.
- Supporting and mentoring the Sustainability and Environmental Team as and when required.

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7.4.5 Senior Environmental Advisor

In addition to the responsibilities of an Environmental Advisor (shown below) a Senior Environmental Advisor has responsibility for:

- Supporting the Procurement Team in the review and approval of high sustainability and environmental risk subcontractors and suppliers.
- To deputise for the Regional Environmental Managers, where necessary.
- Monthly performance reporting, as directed by the Head of Sustainability and Environment and Environmental Managers.
- Undertaking supplier assessments, as directed by the Head of Sustainability and Environment, including environmental consultants, waste management and recycled aggregates.
- Supporting the Head of Sustainability and Environment in the categorisation of incidents and Improve Its.
- Delivering required environmental training, including those as directed by the Head of Sustainability and Environment.
- Supporting ActivSHEQ environmental reporting requirements, including waste management and carbon and social value reporting
- Supporting and mentoring MWH Treatment Environmental Advisors as and when required.

7.4.6 Environmental Advisor

- Providing specialist environmental advice, guidance and support.
- Preparing Environmental Management Plans for the various areas of the business including projects, proposals, and facility management. These are to include construction carbon reduction and biodiversity improvement measures.
- Carrying out audits and inspections of the business activities, sites and offices to ensure that the IMS is being operated correctly to MWH Treatment processes and procedures, continues to be effective and that the required control measures are being implemented.
- Ensuring that Site / Office Management know of their legal waste management obligations, including duty of care documentation.
- Reporting to the regional Environmental Manager on the results of the audit and inspections and any problem areas identified.
- Undertaking or assisting with incident investigations, as directed by the Regional Environmental Manager.
- Monitoring completion of environmental and waste reporting (e.g. on ActivSHEQ).
- Providing briefings and training (producing and delivering), for employees, as directed by the Head of Sustainability and Environment and the regional Environmental Managers.
- Investigating ideas for improvements and best practice for incorporating into the IMS.

- Collaborating within Joint Ventures and JV partners where appropriate including sharing of best practice and reviewing of JV performance.

7.4.7 Environmental Planning Manager

- Promote and drive continuous improvement of environmental planning / enabling performance for the organisation.
- Identify and promote current environmental planning legislation, including best practices relevant to MWH Treatment and Joint Ventures.
- Supervise and mentor the development of Environmental Planners.
- Represent and promote environmental planning in meetings, workshops, management reviews and forums.
- Provide information on environmental planning / enabling for tenders / bids as required.
- Ensuring environmental planning activities are within budget and approvals obtained.
- Develop and deliver environmental planning / compliance training throughout the organisation.
- Ensuring development and consistency of environmental planning practices throughout the MWHT Environmental Planning Team.
- Ensure own continuous professional development by participating in external networking / conferences / associations / groups, to stay current on industry changes and innovations.
- Consult and communicate with clients, Joint Venture and supply chain partners and where required, develop and maintain JV environmental planning management systems / processes.
- Develop and maintain environmental planning element of the IMS and other IMS documentation as appropriate. Analyse current and future procedural needs of the business with the Head of Sustainability and Environment.
- Supporting and mentoring the Environmental Planning Team.

7.4.8 Senior Environmental Planners and Environmental Planners

- To consider sustainability, environmental protection and Biodiversity Net Gain from the onset of a project.
- To provide advice to the Project Team at tender, design and planning stage, to identify environmental deliverables and required studies / surveys, reports and assessments.
- To assist in the identification of Environmental Impact Assessment / Town and Country planning requirements and co-ordinate the delivery of planning applications.
- To assist in the identification of the requirement for Habitats Regulations Assessment, Environmental Permitting and third-party consents, and co-ordinate delivery of reports / applications.

- To assist the project team in providing front end advice on consenting process / timescales to inform the construction schedule.
- To provide environmental project management to ensure the timely completion of environmental deliverables to client expectations, including consultation with regulatory bodies.
- To provide support to manage client expectations and statutory requirements in relation to Biodiversity Net Gain.
- To advise the project team on the management of design changes from a regulatory perspective.

7.4.9 Sustainability Advisor

- Providing support to the Head of Sustainability and Environment, particularly with regards to strategic development and the supporting actions required.
- Collating and analysing of sustainability, environmental and social value related data for internal and external reporting (including the MWHT Sustainability Dashboard and compliance with the Global Reporting Initiative).
- Managing the collation of environmental data and the calculation of the company carbon footprint (including non-mandatory Scope 3 emissions).
- Providing briefings, training and communications, for employees, as directed by the Head of Sustainability and Environment.
- Working on projects across MWHT regions, including supporting the production of Project Sustainability and Social Value Plans and developing case studies.
- Analysing current and future sustainability trends or requirements relevant to the business and assist in identifying solutions to ensure continual improvement.
- To support the partnership with Supply Chain Sustainability School and assist in embedding within MWHT and adoption by the supply chain, including use of the Action Sustainability carbon tool.
- Identifying sustainability, environmental and social value benefits, best practice and carbon savings from design and construction projects.
- Supporting the business in the achievement of operational Net Zero by 2030 and the ambition to be Net Zero (including the supply chain) by 2045, through the EVRE01-05 Net Zero Route Map and Action Plan.
- Supporting the business adoption and implementation of PAS2080 standard.

7.5 Management Meetings

Management of the sustainability and environmental elements of the IMS is directed by means of the following structure (

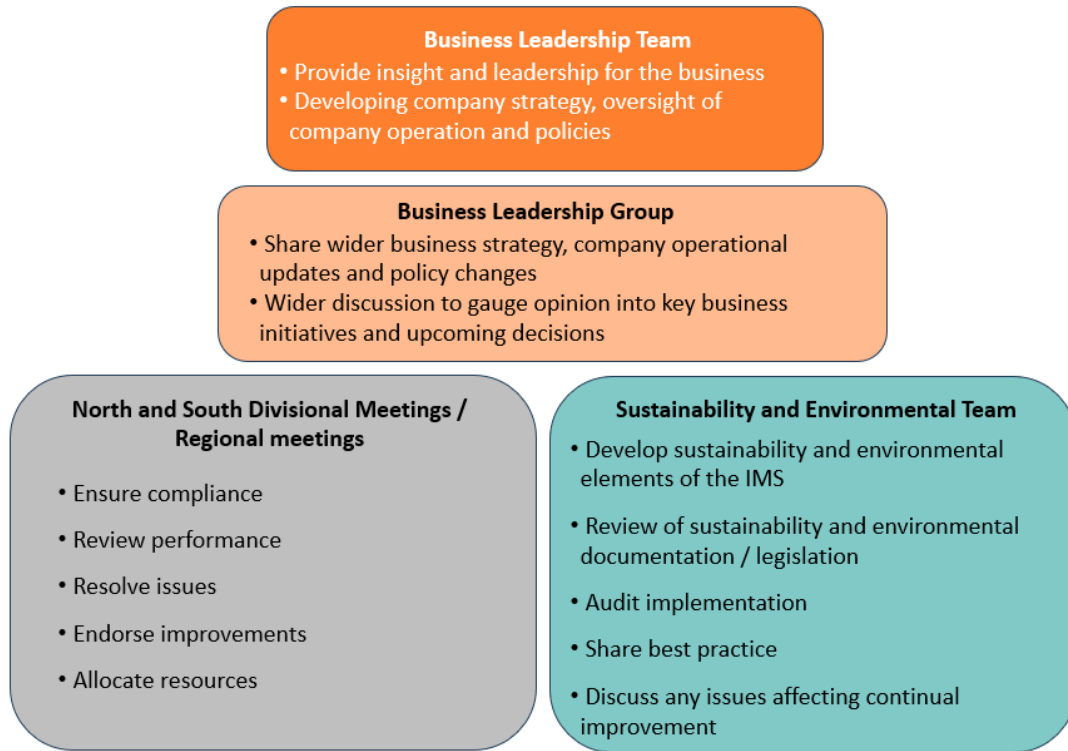


Figure 7) and BPPD04-01 Management Meetings.

7.5.1 Business Leadership Team

The BLT is to provide insight and leadership for the business, developing company strategy, oversight of company operation and policies. It is also an opportunity for the Chief Executive, business and framework leads to discuss business strategic direction (with links to the acquisition strategy), business risks and opportunities, and horizon scanning. The Chief Executive, as part of the Business Leadership Team, is responsible for the Annual SHEQ review and to determine the effectiveness of the Integrated Management System.

For further details refer to Terms of Reference BPGD04-05.

7.5.2 Business Leadership Group

The BLG is a supplementary meeting, sitting alongside the BLT meetings, to share business strategy, company operational updates and policy changes to the wider Company Leadership team and is attended by the BLT members, as well as the Leadership Teams from each of the divisions in MWH and other key senior leaders from various functions. It is an opportunity for wider discussions to gauge opinion and diversity of thought into key business initiatives and upcoming decisions.

For further details refer to Terms of Reference BPGD04-05.

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7.5.3 Departmental Management Teams

The Regional / Framework Management teams are responsible for reviewing sustainability and environmental performance, including incidents and audit findings. The frequency of these meetings is determined by the Regional / Framework Management Teams.

Departmental Management Teams are responsible for endorsing the implementation of sustainability and environmental improvements and allocation of resources. The frequency of these meetings is determined by the Department Management Teams.

7.5.4 Sustainability and Environmental Team Meetings

The function of this meeting is for the Sustainability and Environmental Team to review the implementation and operation of the sustainability and environmental elements of the IMS. An Environmental Leads meeting is held on a monthly basis and a Sustainability and Environmental Team meeting, covering all regions, is held at least annually.

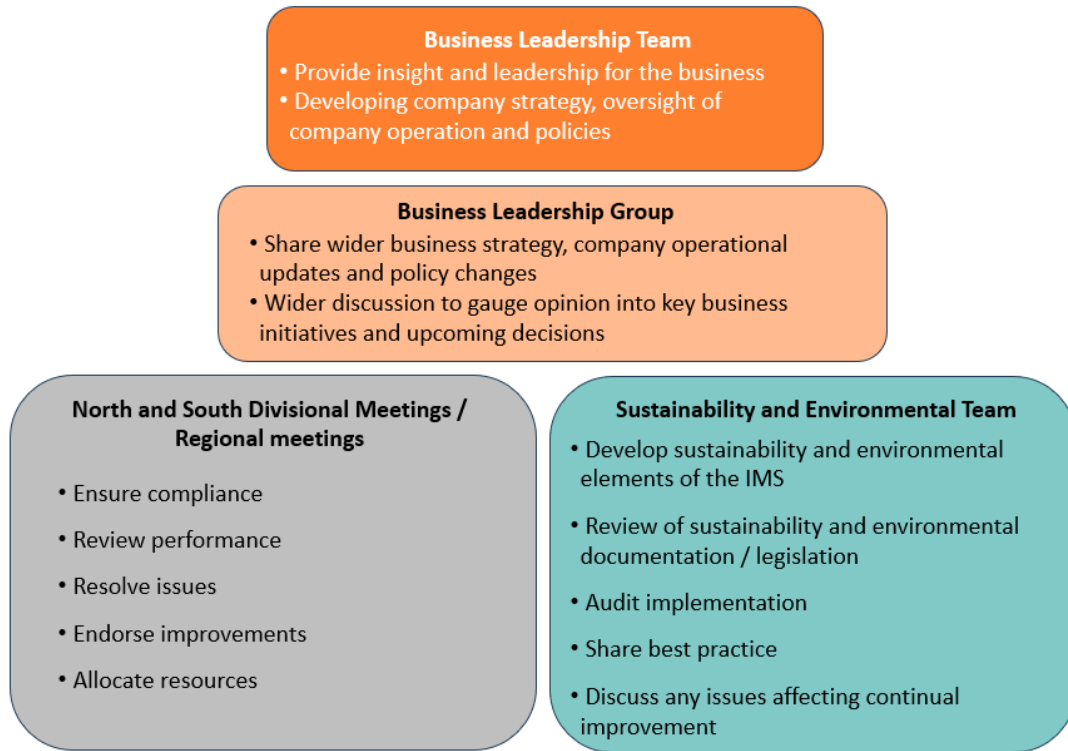


Figure 7: Reporting Structure for Management

7.6 Consultation Committees

Consultation committees (Figure 8) have been established to provide a mechanism to allow employees an opportunity to give feedback, including on sustainability and environmental matters, policy, processes and procedures.

These committees shall comprise of:

- Business Leadership Team meets on a monthly basis (with the Chief Executive’s direct reports). The wider Business Leadership Group, with representatives across the business and functions meets on a 6-monthly basis.
- Specific consultation meetings include: Net Zero Task Force Group (EVGD06-17); Engineering Management Meeting (BPDG04-07), BPGD04-04 Anti-Modern Slavery Working Group (BPGD04-04) and Design Build Sustainability and Carbon Working Group (BPGD04-07).
- Divisional and Regional Management meetings comprising of Project Managers and other staff as appropriate involved with engineering and construction, including Environmental Advisors for the Region / Framework.
- Sustainability Champions meetings (new for 2026) with representatives across the business being established, particularly from an engineering perspective. Refer to BPGD06-12 Terms of Reference.

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Other forms of Employee Representation are detailed in the policy MP100 Employee Representation which includes safety, those required by law, trade unions and workforce representation ('People Champions' – see HRGD25-01 People Champions Working Group Terms of Reference).



Figure 8: Reporting Structure for High-Level Consultation

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8 SUSTAINABILITY AND ENVIRONMENT WITHIN THE INTEGRATED MANAGEMENT SYSTEM

8.1 General

The environmental element of the Integrated Management System (IMS) has been developed to follow Annex SL and in conjunction with our quality and safety elements, in order to comply with the requirements of ISO 14001:2015.

The sustainability and responsible business elements are managed through the IMS and aligned with the environmental elements of the IMS, as appropriate. Due to the nature of sustainability, covering all areas of the business - management and involvement is required from a variety of disciplines.

The IMS has been based on the principles of **Plan - Do - Check - Act**, as indicated below, in order to ensure that we can use feedback to achieve continual improvement. Figure 9 below demonstrates IMS implementation in a cyclic form.

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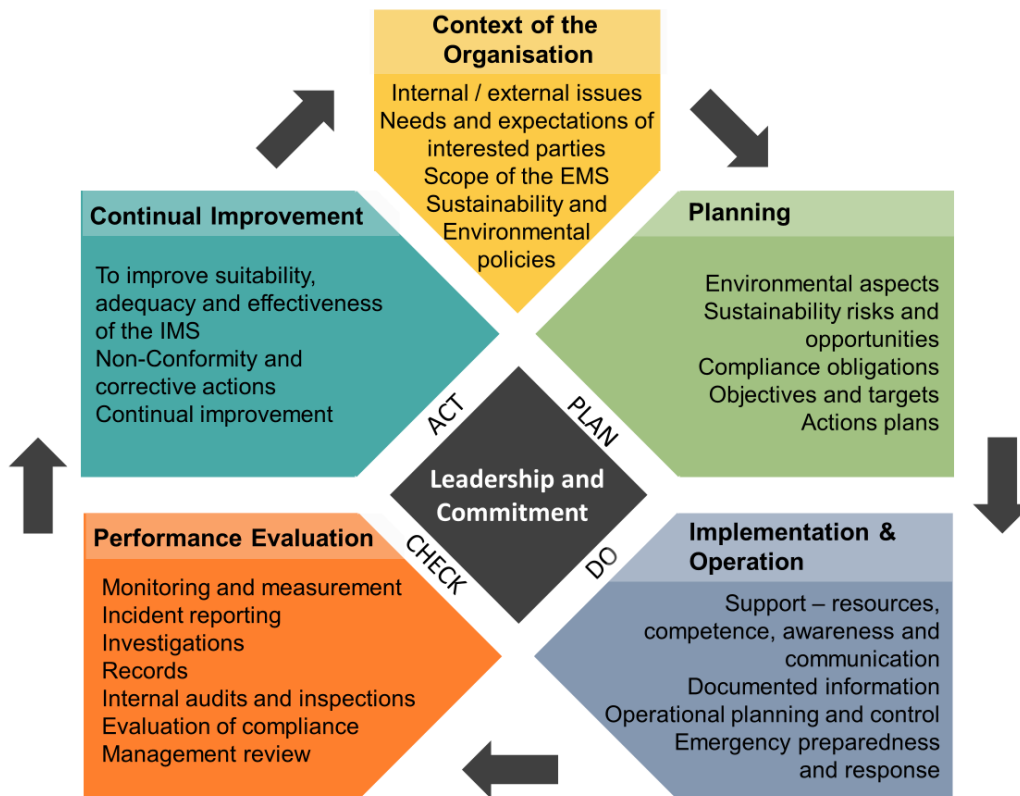


Figure 9: Plan, Do, Check and Act model for Sustainability and Environmental elements of the IMS

Leadership and Commitment

Refer to 7.2 of this Manual which describes how top management are required to demonstrate leadership and commitment with respect to the sustainability and environmental element of the IMS.

8.2 Sustainability and Environmental Policies

8.2.1 Environmental Policy

The MWH Treatment [Environmental Policy](#) is the statement of intent for the environmental element of the IMS. This is posted on company virtual noticeboards, accessible through a QR code, and is available to all employees via the Company intranet. The policy is also covered in internal environmental training modules. It is made publicly available to interested parties upon request. The policy is reviewed annually.

8.2.2 Other Related Policies

[MP01 Sustainability Policy](#)

[MP02 Responsible Business Policy](#)

[MP17 Sustainable Procurement Policy](#)

[MP14 Waste Minimisation Policy](#)

[MP15 Carbon Reduction Policy](#)

[MP94 Water Management Policy](#)

[MP03 Health, Safety and Wellbeing Policy](#)

[MP04 Quality Policy](#)

[MP105 Human Rights Policy](#)

[MP25 Anti-Slavery Policy](#)

[MP100 Employee Representation Policy](#)

[MP57 Equal Opportunities Policy](#)

[MP96 Equality, Diversity and Inclusion Policy](#)

[MP107 Living Wage Policy](#)

[MP84 Business Ethics Policy – Principles](#)

[MP85 Business Ethics Policy – Whistle Blowing](#)

8.2.3 Top Management Commitment

Top management demonstrate their commitment to the policies through:

- Endorsement and publication of the sustainability and environmental policies.
- Setting appropriate objectives and targets.
- Providing adequate resources (including training) for the development and implementation of the IMS, to achieve improvements.
- Carrying out management reviews to monitor the effectiveness and performance of the sustainability and environmental elements of the IMS.
- Communicating the importance of being a Sustainable and Responsible Business, protecting and improving the environment, and meeting the company sustainability and environmental objectives and fulfilling the compliance obligations.

8.3 Planning

Processes SYPD02, SYPD04 and BPPD06

MWH Treatment will consider the following when planning for the sustainability and environmental elements of the IMS:

- External and internal issues
- Compliance obligations, including the needs and expectations of interested parties (stakeholders)
- Scope of the EMS as part of the IMS
- Environmental aspects
- Stakeholder analysis
- Materiality assessment

The above will be used to determine the Business Risks and Opportunities (BPRE08-03), which need to be addressed in order to give assurance that the sustainability and environmental elements of the IMS can achieve its intended outcomes; prevent or reduce undesired effects (including potential for external environmental conditions affecting MWHT); and achieve continual improvement. Appropriate processes will be implemented to fulfil the above requirements, including addressing potential emergency situations which may result in environmental impact.

The sustainability and environmental requirements of the IMS are planned in two levels: company-wide and on a site or activity basis. Company-wide planning is described below, and site-specific planning is described under 'Implementation and Operation'.

When managing organisational change this needs to be planned in accordance with the process diagram BPPD07-01 Management of Organisational Change.

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8.3.1 Environmental Aspects

A review is undertaken to identify the environmental aspects of MWH Treatment's current and future activities that the company can control and influence to determine those aspects that have (or could have) a significant effect on the environment. This is recorded in the [SYRE04-02 Register of Environmental Effects](#). This also identifies the nature of the potential environmental impact and the degree of compliance obligations (see 8.3.2). A qualitative assessment is undertaken on the likelihood and impact to determine the overall environmental significance (see procedure SYPR04). The Registers are reviewed on an annual basis.

8.3.2 Compliance Obligations

Our legal, statutory, and other compliance obligations, including from stakeholders (see 8.3.3 below) are identified, and recorded in a SYRE04-01 Register of SHEQ Compliance Obligations. This is updated throughout the year by an Environmental Advisor(s) using Barbour Consolidated online, and other reputable resources (i.e. IEMA, CIRIA and NetRegs). The EVRE05-01 Register of Consents records all environmental related licences, consents and permissions likely to be required for MWH Treatment's activities. The Register(s) are reviewed on an annual basis.

8.3.3 Stakeholder Analysis

The process for undertaking a Stakeholder Analysis is detailed in BPPD08-01 Determining Organisational Context, Risk and Opportunity. BPFR08-03 Stakeholder Interest / Influence Matrix is produced, and reviewed annually, with BPFR08-01 Stakeholder Profiles developed for key stakeholders and guidance providing a commentary on the results (BPGD08-02 Stakeholder Interest / Influence Matrix Commentary). This includes stakeholders (interested parties) who may have requirements related to climate change and considerations with regards to new opportunities, business risks and global / national trends. Stakeholders will be consulted as necessary with the development of the sustainability strategy and continual improvement.

Stakeholders specific to Design Build sustainability and carbon considerations is covered in MA12 Design Build Sustainability and Carbon Management Manual (section 3 and Appendix 2).

8.3.4 Materiality Assessment

The process for undertaking a Materiality Assessment is detailed in BPPD08-01 Determining Organisational Context, Risk and Opportunity. The Materiality Assessment is to be undertaken every 5 years, or more frequent if there are significant business activity changes. It is reviewed annually for appropriateness and as part of the SHEQ Annual Review.

Refer to Section 5.1 for current materiality assessment and priority areas.

8.3.5 Objectives, Targets and Action Plans

The environmental significance identified from the SYRE04-02 Register of Environmental Effects is used to determine the control measures to be incorporated into the environmental element of the IMS and the performance objectives. The control measures include all aspects of the environmental management such as allocation of responsibilities; training; implementation of processes, procedures and guidance notes; resources; management of suppliers and subcontractors.

Appropriate performance objectives and targets are set to provide a focus and measure for sustainability and environmental performance, and continual improvement (see procedure SYPR02).

For sustainability related strategic priorities (i.e. with potential objectives and targets) the desired impact will be determined. A review will be undertaken to identify the potential positive and negative consequences (both intended and unintended) on the business Sustainability and Responsible Business material issues (see 5.1;

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Figure 4). These consequences are likely to be caused by delivering each strategic priority - to consult with stakeholders, as appropriate. These are to be recorded within the BPRE06-02 Sustainable and Responsible Business Action Plan. These will also be reviewed at a functional / departmental level, if deemed necessary by the Head of Sustainability and Environment.

An Environmental Action Plan (EVRE01-02) is produced to define: the objectives and targets for the significant environmental aspects; address the identified risks and opportunities; compliance obligations and, initiatives for continual improvement.

The Action Plans - BPRE06-02 Sustainable and Responsible Business Action Plan (incorporating the Sustainability and Responsible Business Communications Plan) and EVRE01-05 Net Zero Route Map and Action Plan are developed from review of the following (this is not an exhaustive list):

- BPRE08-03 Business Risk and Opportunity Register

- BPRE08-04 Materiality Assessment Workbook
- BPRE06-04 Sustainability Contractual Requirements and Contacts
- Improvement recommendations from completion of the Ecovadis Sustainability Assessment
- Improvement recommendations from the Business in the Community Responsible Business Tracker and through membership events and toolkits
- Endorsement of the UN Global Compact and the associated 10 principles
- RSK Second Nature Sustainability Strategy
- RSK TCFD (Task Force on Climate-Related Financial Disclosures)
- ISO Net Zero Guidelines (IWA 42:2022(E))
- PAS2080: 2023 Carbon Management in Buildings and Infrastructure (including the guidance document)
- Recommendations through the Supply Chain Sustainability School partnership
- Recommendations through membership of the Slave Free Alliance

Progress of any identified initiatives and evaluation of their effectiveness will be recorded in the updates of the Action Plans throughout the year and incorporation into the monthly BLG reports, regular BLG calls BLG meetings or divisional/framework meetings, as appropriate. The Action Plans are reviewed by the Head of Sustainability and Environment, the regional Environmental Managers / Leads, the Sustainability team and others, as appropriate. Progress will be reported to the SHEQ Director and the Business Leadership Group.

8.4 Support

8.4.1 Resources

The organisation and reporting structure is detailed in Section 7.

Resources are discussed on a regular basis at the BLG and SHEQ Leadsmeetings (see section 7.5).

8.4.2 Competence, awareness and training

(Processes SYPD07; CDPD30; FSPD03; EVPR01 / EVPD01; SUPD21).

The training and development requirements are defined by the Job Description / Job Roles and in the [HRGD06-01 SHEQ Matrix](#).

All personnel whose work can have an adverse effect on the environment to be competent to undertake the required task.

From an environmental perspective - the training provided by MWH Treatment has been developed to ensure awareness of those working on the company's behalf, of:

- The Environmental Policy

- Significant environmental aspects and related actual or potential environmental impacts associated with their work, including pollution prevention, waste management and emergency response.
- Their contribution to the effectiveness of the IMS, including the benefits of enhanced environmental performance.
- The implications of not conforming with the IMS, including non-fulfilment of compliance obligations.

From a wider sustainability perspective - the training provided by MWH Treatment has been developed to ensure awareness of those working on the company's behalf, of:

- Overview of the MWHT Sustainability approach
- Knowledge of the overarching Net Zero targets and ambitions and how their role can contribute to achieving this.

All personnel with a direct responsibility for sustainability and environmental matters are required to have appropriate training, for example:

- Environmental Auditors - training in ISO14001 and auditing from an IEMA approved course or other as appropriate, depending on level of responsibility and experience. Additional sustainability related training depending on scope of their regional / central role.
- Proposals Managers / Engineers and Designers - knowledge of sustainability and environmental issues and compliance obligations pertaining to tenders and design, and the selection of equipment and subcontractors.
- Designers – knowledge of environmental management and compliance obligations with regards to design activities; consideration to sustainability matters during design such as carbon reduction and biodiversity; PAS2080 compliance.
- Project Managers – knowledge of environmental management regarding projects and construction, including compliance obligations; knowledge of sustainability considerations within project management, PAS2080 compliance.
- Site Management / Office Management - knowledge of environmental issues and legislation pertaining to our business; a working knowledge of the control measures to be taken on site / office / treatment plant to avoid or mitigate environmental incidents; knowledge of sustainability considerations within site / office management.
- All construction site operatives - induction training and, where appropriate, toolbox talks on sustainability and environmental issues that affect their work. This training is given to both staff and subcontractors' personnel.
- Procurement – knowledge of ethical (human rights / slavery) and environmental risks in the supply chain; knowledge of business processes to address these risks; awareness of supplier sourcing for low carbon / alternative sustainable products, PAS2080 compliance.

Competence can be verified by internal assessments and where issues with competence are identified - e.g. during audits, further training - re-assessment will be necessary. These are identified in the EVRE01-01 Environment Training Course Details for each module.

Effectiveness of the training will be reviewed by use of the training feedback forms and reviewing audit findings and corrective actions.

8.4.3 Communication

(Procedures SYPR09, BPPR02 and EVPR01)

The principles of our communications with environmental content should follow ISO14063: 2020 'Environmental communication – Guidelines and examples'. Our environmental related communications will be transparent, appropriate, credible, responsive, clear and reliable.

Definition of the Principles

Transparency: Make the processes, procedures, methods, data sources and assumptions used in environmental communications available to all interested parties, taking account of the confidentiality of information as required. Inform interested parties of their role in environmental communication.

Appropriateness: Information provided in environmental communication shall be relevant to interested parties, using formats, language and media that meet their interests and needs, enabling them to participate fully. The communication should take into account diversity, inclusion and gender of the interested parties.

Credibility: Conduct environmental communication in an honest and fair manner, and provide information that is truthful, accurate, substantive and not misleading to interested parties. Develop information and data using recognised and reproducible methods and indicators.

Clarity: Ensure that environmental communication approaches and language shall be understandable to interested parties to minimise ambiguity.

Regionality: Environmental communication to take into consideration the local or regional environmental context relevant to the area where the corresponding environmental impact occurs.

In addition, communications are to be reliable where information must be a faithful representation of reality and be true, fair and balanced.

Internal communication of information containing sustainability and environmental content is achieved by a number of methods including (but not an exhaustive list):

- Announcements (Company Intranet / email) – review and approval required from Communications Team
- Posting information on company Notice Boards and the company Intranet – approval may be required from the Communications Team / regional management
- Issue of Environmental Alerts, Best Practice Bulletins, Lessons Learnt and Memos – responsibility of the SHEQ and Sustainability Department. Approval obtained from the Legal Director as appropriate
- Minutes of meetings
- Presentations, workshops and training covering the organisation – sustainability and environmental specific sessions are organised through SHEQ Skills Team.

These can be provided inhouse by the Sustainability and Environmental Team, through the Supply Chain Sustainability School or other training providers

- Messaging and updates on the company Intranet for announcements and to communicate document changes
- Issue of sustainability and environmental related documentation including policies, processes, procedures, guidance notes, forms and posters – responsibility of the Head of Sustainability and Environment
- Annual SHEQ Review – responsibility of the SHEQ Director, Head of Sustainability and Environment, and Head of SHEQ

Top Management are to ensure that the following are communicated:

- Importance of effective sustainability and environmental management and conformity to the sustainability and environmental element of the IMS
- Sustainability and Environmental Policies (e.g. via the company intranet etc.)
- Responsibilities and authorities for relevant roles (e.g. through processes, procedures, guidance, meetings, briefings etc.)

For further information, refer to the [SYGD09-01 Environmental Communications Guidance](#) (SYGD09-01) which covers system and company communication requirements. Where appropriate, for specific communication activities an [SYFR09-01 Environmental Communications Action Plan](#) may be developed or incorporated into the Sustainability and Responsible Business Communications Plan contained within BPRE06-02 Sustainable and Responsible Business Action Plan.

Communication with relevant interested parties (stakeholders) will take into account the MWH Treatment compliance obligations. The majority of communications with interested parties will be with the clients and on a project-by-project basis. Where applicable, communication with the environmental regulators can be established prior to the start of activities. Communication will be handled as the following:

- Technical queries and Environmental Regulator consultation are covered by the Environmental Advisor(s) and / or Project / Site team, as deemed appropriate.
- Project sustainability and PAS2080 communications and collaboration are predominantly handled by the Project Manager and Design Manager, with support from Proposals, Sustainability and Procurement representatives, as appropriate.
- Complaints and concerns from interested parties will be initially dealt with by the project team and escalated to the Sustainability and Environmental Team, where appropriate. These actions will be in accordance with procedures BPPR02 Customer Communications, SYPR07 Reporting and SYPR08 Investigation and Review.
- Contractual communication is covered by the General Managers, Regional / Framework Business Managers, Operations Managers, Proposals Engineers, Project Managers and Site Managers or other appropriate person, where required.
- Press releases are covered by the Communications Team.

In the event of an environmental incident on site, the client will be informed, and a decision will be made on who contacts the Environmental Regulator (the process to follow will be regionally dependant and as stated in the EMP). If an environmental incident occurs in an MWH Treatment office, consult with an Environmental Advisor on whether reporting to the Environmental Regulator is necessary. MWH Treatment environmental emergency plans are to be followed as detailed in EVPR04 Environmental Emergency Preparedness and Response.

Information concerning significant environmental aspects and impacts shall be communicated in writing with external parties if requested, but this shall be at the discretion of the Head of Sustainability and Environment and/or Head of SHEQ. Refer to process SYPR04. Environmental aspects and impacts are communicated internally through a variety of means including processes, procedures, toolbox talks, guidance notes, training, posters etc. Sustainability and environmental objectives and targets will be communicated internally e.g. briefings, performance reports, written communications, company intranet and meeting records.

Communication with external media is to be undertaken in accordance with process SYPD09-01 Communications and Consulting, and procedure BPPD02-01 Customer and Client Communications. The Legal Director is to be consulted, where appropriate.

Lessons Learnt are recorded on a specific ActivSHEQ module with the findings reviewed by the central SHEQ and Sustainability Department and Project teams (as appropriate), this will include appropriate internal and external communications including compliments and feedback. External complaints e.g. from local residents, general public, are to be raised as an incident or improve it (as appropriate) on ActivSHEQ.

8.4.4 Engagement and Collaboration

Refer to SYPD09-01 Communication and Consulting process.

Internal Engagement and Collaboration

Employee engagement is key to delivering the action needed to achieve the business's purpose and sustainability objectives. Reasons for engaging employees² include:

- Strategies are implemented efficiently and are more effective
- Creating a culture to equip and support employees to identify opportunities for innovation and drive change
- Employee action driving senior leaders
- Talent acquisition and retention (due to strong sustainability business credentials and evidence of engagement)
- Improving productivity (i.e. lower absenteeism and increase in motivation)
- Revenue growth (shown through external research)

(Adapted from Business in the Community Toolkit Series 'How to Activate Employees on Responsible Business' [February 2023]).

To engage and collaborate with employees on sustainability and environment, MWH Treatment currently undertake the following:

- Bimonthly SHEQ and Sustainability Conference Call with Slido used for anonymous comments and questions throughout the call
- Sustainability training incorporated into existing internal training (i.e. induction, environmental management bespoke modules, annual roadshows)
- Sustainability training available and assigned through Supply Chain Sustainability School
- Employee Sustainability and Responsible Business survey (to be undertaken every 2 to 3 years as part of the materiality review)
- Business 'Improve Its' reporting, via ActivSHEQ, includes 'carbon and sustainability' (covered by SYPD07-01 Reporting)
- Annual MWHT Achievement Awards including a Sustainability and Responsible Business category
- Annual RSK Innovation Awards
- Spot Bonus Scheme (MP70 policy)
- MP100 Employee Representation Policy provides information for MWH Treatment and workplace representatives to build effective methods of communication and consultation between management and representatives
- Through the People Champions (HRGD25-01 People Champions Working Group Terms of Reference). The People Champions purpose is to ensure that employees are consulted with employee related business changes, strategies or projects and have the opportunity to provide feedback on behalf of all employees.
- Transparent reporting and promotion of feedback provided through 'You Said, We Did'
- 'Let's Talk' performance reviews, employees set objectives against the business's strategic priorities (including 'being a sustainability and responsible business' – see section 4.4)
- Net Zero Taskforce with representatives across various disciplines including sustainability and environment, SHEQ, procurement, commercial, facility management, fleet, operations and IT
- For design and build projects there is a Project Sustainability and Carbon Working Group (Terms of Reference – EVGD06-11) and a Capital Carbon Knowledge Group (Terms of Reference – EVGD06-10)
- Consultation Committees (see section 7.6) including Business Leadership Group, subject matter / functional specific and Divisional / Framework Management meetings

Refer to the process SYPD09 Communications and Consulting for company communication methods.

Further development, with regards to engagement and consultation, is necessary to establish regional engineering and operations sustainability representatives.

External Engagement and Collaboration

MWH Treatment will engage and collaborate with external stakeholders (refer to section 8.3.3 Stakeholder Analysis) where deemed necessary. This may include (this is not an exhaustive list):

- RSK Group (parent company) e.g. presenting on webinars, attending Sustainability Champions meetings, sharing of best practice
- Client forums, conferences and workshops
- Client and Supply Chain meetings e.g. project reviews, subcontractor meetings, regular national framework supplier meetings
- Business in the Community e.g. Peer Learning Forums, workshops, conferences and sharing of best practice
- Supply Chain Sustainability School Leadership Groups e.g. Climate Action, Modern Slavery; Social Value; Plant; Procurement; Natural Resources; Waste and Resource Use
- Supply Chain Sustainability School workshops held by MWHT for the supply chain to attend
- Slave Free Alliance e.g. supporting meetings, sharing of best practice

For Value Chain³ Collaboration (including for PAS2080 compliance) consultation and collaboration is required. Below provides an overview of the requirements (detailed in MA12 Project Sustainability and Carbon Management Manual):

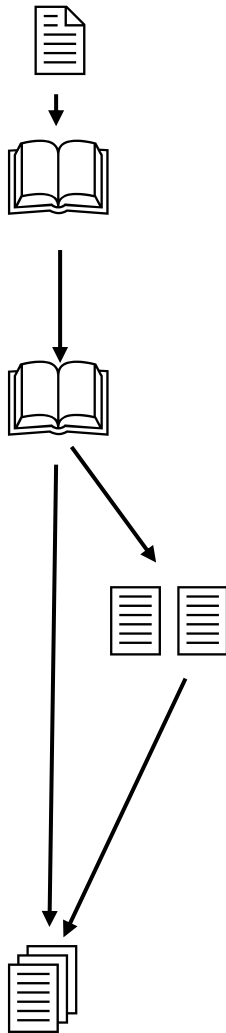
- Collaborate and engage with clients, the supply chain and other stakeholders on identifying and implementing sustainable solutions to deliver the necessary level of climate change resilience for lowest whole life carbon. This includes the identification, promotion and implementation of carbon reduction opportunities (including for decarbonization) and risks at asset, network and system level. This is to include the sharing of good practice outcomes, including non-carbon impacts and benefits of opportunities,
 - To include other external (e.g. regulators, local planning authorities etc.), as appropriate.
 - To share good practice outcomes, including non-carbon impacts and benefits of opportunities,
 - Includes: MWHT representatives attending various client carbon / sustainability working groups / forums; the Supply Chain Sustainability School Climate Action Group; attending trade events; supply chain meetings.

³ In PAS2080: 2023 'Value Chain' is defined as 'organisations and stakeholders involved in creating, operating and managing assets and / or networks'. These include asset owners / managers, designers, constructors and product / material suppliers, as well as regulators and financiers.

- To challenge the clients' standards and prescriptive requirements that have an impact on Whole Life Carbon.
- Provide feedback to client and supply chain and adopt feedback to improve business processes.
- Support our supply chain in demonstrating their own carbon reduction commitments through: partnership with the Supply Chain Sustainability School; holding workshops; providing access to a free organisational carbon calculator; discussions / dialogue with framework suppliers covering sustainability and carbon; guidance provided to supply chain members on reducing their emissions.
- To submit carbon reduction proposals to other value chain members, as appropriate.
- To capture data and share knowledge on innovative construction techniques, materials and product use.
- To communicate and share carbon baselines and targets with other value chain members.
- PAS2080 specific: To challenge the client where no targets have been set. To share with the supply chain how they can support in achieving the target(s).
- PAS2080 specific: To identify and report to the client (and supply chain, as appropriate) on where carbon hotspots (greatest carbon emissions) are expected or have occurred, and where future reductions can be made.
- To monitor and report on target progress (as agreed with the client) and predicted whole life carbon emissions (at design stage). Report performance against these targets and review against cost and programme. This includes reporting of any uncertainties at appropriate project stages.
- PAS2080 specific: To recommend and record improvements to target and baseline setting, and monitoring and reporting (including the collecting and sharing of relevant data). To identify limitations in the accuracy of setting baselines and report any uncertainties at appropriate project stages.
- PAS2080 specific: To engage with the value chain to identify how incentives within contracts can encourage the implementation of low-carbon solutions.
- To identify opportunities to collaborate with the value chain in the development of low-carbon skills and capability. For example, through the Supply Chain Sustainability School and ECITB.

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8.4.5 Documented Information



Policy

Defines our policy and commitment to sustainability and the environment.
 Document reference: MP

Sustainability and Environmental Management Manual

Describes the sustainability and environmental related elements of the Integrated Management System including context of the organisation, environmental effects, compliance obligations, action plans, operational control and performance monitoring.
 Document reference: MA02

Processes, Procedures, Guidance Notes and Environmental Rules

Describes how to manage particularly sustainability and environmental elements of the Environmental Management System.
 Document reference: SYPR, SYPD, SYGD, EVPR, EVPD, EVGD, EVRU, PSPD, PSPR, CDP, CDPD, CDGD, BPPD, BPPR and BPGD.

Environmental Management Plan

Defines the specific environmental hazards and management arrangements to be implemented on a project or site plus contractual requirements.
 Document reference: EVFR01-01

Project Sustainability and Social Value Plans

For projects within set criteria – the Plan provides the project with direction regarding sustainability and social value improvements and contributions to communities.
 Document reference: PSFR03-09

Forms / Records

Provide evidence of implementation of the sustainability and environmental element of the IMS
 Document reference: SYFR, EVFR, PSFR, CDFR, BPFR

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Figure 10: Principal Sustainability and Environmental Documentation

Documentation revisions are issued as necessary with regards to audit findings, corrective actions, changes to compliance obligations, identified improvements and feedback. Refer to process [SYPD01 SHEQ System Documentation and Records](#).

Document Control

All sustainability and environmental related documentation within the IMS has a unique identification and description with a reference number and a revision number. External standards will be obtained from IHS. Externally produced documentation, that is an integral part of the IMS is document controlled and included within the IMS with specific reference to its origin (see process SYPD01). Such externally produced documentation is reviewed six monthly to ensure current editions are in use, using the form EVFR05-02 Environmental Other Requirements Update.

The latest version of the IMS documentation, where applicable, is available for reference via the company intranet (where appropriate) and available on IFS. Where necessary, to avoid non-permitted documentation changes, PDFs will be made available to employees.

Personnel who have a direct responsibility for implementing the IMS will have access to the relevant documentation via the company intranet and IFS. Personnel shall be advised of changes as and when required and issued with updates, where applicable.

Superseded or obsolete documents shall be destroyed / archived, or marked as such, to avoid inadvertent use.

Written records e.g. monitoring logs, are to be retained and archived with the relevant project documentation, as per the archiving process (FS01).

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8.4.6 Operational control

(Processes SYPD07; CD, FS, EVPD01 and EVPR01; EVPD07 and EVPR07; SUPD21; Life Cycle BPPD06-02)

Life Cycle Approach

The supply chain (products and sub-contractors) will be reviewed at each life cycle stage for sustainability and environmental impact and whether MWH Treatment may have influence or control on these activities.

The life cycle stages reviewed are for each product group and MWH Treatment activities:



This high-level review process will assist in determining actions and communications required for sustainability and environmental improvement within MWH Treatment and our supply chain. Where appropriate, improvements and potential risks will be incorporated into the BPRE08-03 Business Risks and Opportunities Register.

Information will be provided to the client, as appropriate, on maintenance, use, end-of-life treatment and final disposal of MWH Treatment products and services. This is through the O&M Manuals (process CDPD21) and providing the client with a Health and Safety File which has an environmental section (process CDPD23).

Tender / Pre-Tender

Operational control starts at the tender or pre-tender phase during which the environmental requirements of the project will be identified with identification of resource requirements and schedule implications. Where necessary, consultation with the Environmental Advisor(s), or other relevant environmental authorities, will be undertaken to clarify the requirements and limitations.

Consideration shall be given to the design to see if potential environmental hazards can be avoided or minimised, and how the carbon impact of a project could be reduced (embodied and/or operational, as appropriate). Suitable allowance shall be made in the tender for managing any residual risk. The residual risk will be highlighted on the Risk Register. Where requested by the client (or otherwise required) a Tender or Outline Environmental Management Plan (EMP) will be prepared. Refer to procedure EVPR01 Environmental Management Plans and EVPR07 Environmental Planning.

Where projects fall within set criteria, a PSFR03-09 Project Sustainability and Social Value Plan (PSSVP) will be adopted. The sustainability direction and social value contribution of the project will be determined through adoption of the PSSVP, with appropriate costs and resource requirements incorporated into the tender schedule and costs.

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Initial considerations, with Proposals and Design, on how the carbon impact of the project could be reduced (embodied and/or operational, as appropriate) and identify if the project is to follow PAS2080 requirements.

Design and Construction (Processes and procedures in Construction Delivery, Design and Environmental Management Workstreams)

On initiation of the contract, the Environmental Advisor(s) or delegated person prepares an Environmental Management Plan (EVFR01-01), in consultation with the Project Manager, Design Engineers and Site Manager. The EMP identifies our environmental obligations, site specific hazards and control measures required to minimise the risks. Refer to procedure EVPR01 and EVPR07 with regards to environmental planning handover.

Design will take whatever practicable measures are required to minimise any environmental hazards and will identify and communicate any significant residual risks. Environmental issues are resolved, where possible, by means of the design review process. Consideration through lean design and value engineering on how to reduce carbon (embodied and/or operational, as appropriate), use lower carbon / alternative sustainable solutions, and compliance with PAS2080 where specified. This is incorporated into the procedure DEPR08 Safety, Environmental and Sustainability Considerations in Design and accompanying guidance notes.

Project Managers will ensure that sustainability and environmental matters are co-ordinated between the various disciplines including suppliers and subcontractors.

The Framework Directors will appoint a Site Safety and Environmental Supervisor (SS&E) on site. Environmental responsibilities can be delegated by the SS&E Supervisor but they shall still ensure that the necessary control measures, specified in the EMP, are implemented and maintained. The SS&E Supervisor shall ensure that all operatives receive induction training in the relevant environmental matters. They will oversee the implementation of good environmental practices by both MWH Treatment and our subcontractors.

The Commissioning Engineer prepares a Commissioning Management Plan, which includes identifying environmental risks and the actions necessary to avoid creating an environmental incident during the commissioning process.

Survey and Data Management (Processes SUPD21, EVPD01 and procedure EVPR01)

A generic EMP has been prepared for surveying activities. The Operations Managers, Project Managers and Project Engineers are to ensure compliance with the EMP and good environmental practices. Risk assessments are produced for activities which are not covered by the generic EMP. For any projects, outside the scope of the generic EMP a project-specific plan will be developed in collaboration with an Environmental Advisor.

Offices (Processes and procedures EVPD01, EVPR01, EVPD03, EVPR03 and SYPD07)

Specific office EMPs are in place with associated documentation for day-to-day operation. Office Manager / Representative is responsible for ensuring compliance with the EMP and consulting with an Environmental Advisor, where necessary.

Effluent Treatment Plants (Processes and procedures EVPD01, EVPR01, EVPD03, EVPR03, EVPD04, EVPR04, EVPD05 and EVPR05)

A specific EMP will be produced and implemented for each individual Effluent Treatment Plant (sewage, water or industrial effluent) where MWHT are responsible for operation and/or maintenance. The Plant Manager is responsible for: ensuring compliance with the relevant Consents, Permits or Licences including monitoring; implementing the EMP; and consulting with an Environmental Advisor where necessary.

Outsourcing of Goods and Services (Procedures PMPR03 and PMPR05)

Companies within the MWH Treatment supply chain are assessed on sustainability adoption and their environmental management before they are able to commence work with MWHT. For those deemed higher sustainability and/or environmental risk an Environmental and/or Sustainability competent person is to undertake the assessment (PMGD05-01 and PMGD05-03). There are separate checks to be undertaken for recycled aggregate suppliers, asbestos contractors, waste contractors, and cleaning and security companies (see process PMPD05). For professional services providing sustainability and/or environmental specialist support an environmental and/or sustainability competent person will undertake an environmental competency review as part of the supplier assessment (process PMPD05). Labour agencies are required to complete a specific assessment which covers human rights, modern slavery and equal opportunities (process HR01).

8.4.7 Emergency preparedness and response

Environmental Emergencies

(Process EVPD04 and procedure EVPR04; Survey Services SUPD21)

The EMP shall incorporate Emergency Plans for any reasonably foreseeable event that could give rise to an environmental incident.

The nominated environmental representative, e.g. Project Manager, Office Manager, Site Manager / Site Safety and Environmental Supervisor, shall ensure that the necessary resources are in place, that everyone is aware of their responsibilities, training is provided where appropriate and shall carry out practices as appropriate.

Emergency situations which are deemed to be a significant potential risk to MWHT have individual standard emergency plans, including spill and fire response; silt pollution; flooding; and discovery of protected species; land contamination and archaeology. For construction activities, where appropriate as per procedure EVPR04, a site-specific Environmental Emergency Plan (EVFR04-01) will be produced.

In the event of an incident or practice / drill, the emergency response is to be reviewed and the process(es) will be revised as necessary.

Human Rights Violations

For any potential human rights violations (including modern slavery), where related to MWHT direct and indirect activities, are to be reported as per the [HRPD22-01 Modern Slavery Escalation Process](#) and the [MP85 Business Ethics – Whistle Blowing Policy](#).

8.5 Performance Evaluation

8.5.1 Monitoring and measurement

(Process SY02, Construction Delivery (CD), Facilities Management (FS), processes and procedures EVPD01, EVPR01, EVPD05, EVPR05 and EVPR07; process SUPD21;)

Where SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) sustainability and environmental targets are in place, the necessary mechanism will be established to monitor, measure, analyse and evaluate the relevant performance parameters. These will be specified in the following documents:

- BPRE06-03 Sustainable and Responsible Business Dashboard
- SYRE02-01 SHEQ Objectives and Targets
- EVRE01-02 Environmental Action Plan
- BPRE06-02 Sustainable and Responsible Business Action Plan
- EVRE01-05 Net Zero Route Map and Action Plan
- BPRE06-05 MWHT National Social Value Plan

The nominated site environmental representative, e.g. Project Manager, Site Safety and Environmental Supervisor, Office Manager, carries out regular inspections to ensure that work is being carried out in accordance with the requirements of the EMP and good sustainability and environmental practice. Where the EMP and/or Permits, Consents or Licences, defines specific criteria to be met, e.g. discharge consent standards, maximum noise levels, etc, suitable, calibrated equipment shall be used. Tests shall be carried out by a competent person.

In addition, the Environmental Advisor(s) carries out periodic inspections / audits in order to verify that the IMS is being correctly implemented, monitoring and measurement has been appropriate, and compliance is evaluated. The findings are reviewed at the management / committee meetings. The frequency of periodic audits are determined by an environmental risk rating (guidance SYGD03-01).

Where monitoring is undertaken, as appropriate, suitable calibrated equipment will be used. The outcome of this monitoring will be reported to the appropriate Environmental Regulator, Ofgem or Water Utilities, and client as specified i.e. to demonstrate Environmental Permit compliance.

8.5.2 Evaluation of compliance

(Processes SYPR03 and SYPR04, process EVPD02 and procedure EVPR02).

Compliance with the legislative requirements, and other sustainability and environmental obligations, is verified by means of a legislation compliance audit. This is part of the internal audit process and completed by a Sustainability or Environmental Advisor / Manager.

Compliance status of MWH Treatment will be recorded as part of the audit and communicated where necessary, to the Environment and Sustainability Team, SHEQ and Sustainability Department, Business Leadership Group or employees.

8.5.5 Internal audit

(Processes SYPD03, EVPD02 and procedure EVPR02).

Routine inspections / audits of sites are carried out by an Environmental / Sustainability Advisor and other auditors to ensure that good sustainability and environmental practices are being operated and the requirements of the EMP, processes, procedures and guidance notes are being followed. The audits follow established audit programmes (see process SYPD03). The routine audits are to be carried out by a qualified and experienced person who is independent of the day-to-day project / site / plant management. The audit findings and reports are uploaded to ActivSHEQ (or other equivalent depending on Joint Venture requirements). Audit findings and corrective actions are reviewed on a regular basis and close out of actions are tracked and recorded.

In addition, periodic audits of the IMS will be undertaken to ensure continued effectiveness and compliance with ISO14001:2015. The auditor will be an experienced person who is independent of the day-to-day sustainability and environmental elements of the IMS implementation.

8.6 Management Review

(Process SYPD02).

The sustainability and environmental performance of the company is reviewed on a routine basis at the Environment and Sustainability Team meetings and the Business Leadership Group (See section 7.5). This review can include:

- Inputs: Incidents, Improve Its and investigations; results and trends of audits; non-conformances and corrective actions; fulfilment of compliance obligations; monitoring and measurement results; sustainability assessment findings; design build sustainability and carbon management learnings (including PAS2080 compliance)
- Communications from interested parties (stakeholders), including feedback and complaints
- Sustainability and environmental performance and effectiveness of the IMS
- The extent to which objectives and targets have achieved
- Adequacy of resources

- Status of non-conformances and corrective actions
- Status of actions from previous management reviews
- Changes which may affect the sustainability and environmental element of the IMS, e.g. due to changes to external and internal issues; needs and expectations of interested parties (including compliance obligations); environmental aspects; risks and opportunities; context of the organisation; legislation; best practice; feedback and suggestions
- Opportunities for improvement

There will be an annual review to look at the overall performance of all aspects of the IMS, its effectiveness during the previous year, and to set the objectives for the next year. This is in addition to reviewing the above points. The review will be completed by the SHEQ Director, Head of SHEQ and Head of Sustainability and Environment. The report of this review will be reviewed and approved by Business Leadership Group representatives and the Chief Executive.

Outputs of the management review includes:

- Conclusions on the continuing suitability, adequacy and effectiveness of the IMS, including compliance with PAS2080 and ISO Net Zero Guidelines.
- Decisions relating to continual improvement opportunities
- Decisions related to any required changes to the IMS, including resources (physical, human and financial)
- Actions, where necessary, when sustainability and environmental objectives have not been achieved
- Opportunities to improve integration of quality, health, safety, wellbeing, sustainability and environment into other business processes as deemed necessary
- Any implications for the strategic direction of the organisation

8.7 Transparency

In accordance with one of the ISO 14063 principles for environmental communication – transparency (see section 8.4.3), MWHT are to provide transparent sustainability and environmental communications both internally and externally. This should include both successes and where MWHT have not met objectives and targets. Communications will be undertaken as per the Sustainability and Responsible Business Communications Plan contained within BPRE06-02 Sustainable and Responsible Business Action Plan.

8.8 Reporting

Reporting is undertaken through various means and tailored to both internal and external audiences.

The following reporting is currently a legal requirement:

- Annual Modern Slavery Transparency Statement (which is also added to the Government Modern Slavery Statement registry).

- SECR (Streamlined Energy and Carbon Reporting) including a narrative on energy efficiency action taken in the financial year – annual as part of the financial report. This is undertaken by RSK as the parent company and preference to including MWHT SECR report if producing separate MWHT Financial Report.
- TCFD (Task Force on Climate-related Financial Disclosures) requirement for parent company RSK and incorporated into RSK annual sustainability report
- Double Materiality Assessment (DMA) to comply with the EU Corporate Sustainability Reporting Directive (CSRD) is incorporated into RSK Sustainability Report. This is recommended to be reviewed annually and reassessed every 2 – 3 years.

Internal reporting is undertaken through the following:

- Completion of the Annual SHEQ and Sustainability Report (as per section 8.6 Management Review section). This aligns with the Sustainable Development Goals (see section 4.5) and includes specific sections on sustainability, wellbeing, human rights and modern slavery, carbon and social value.
- Annual Sustainability and Responsible Business Dashboard, with alignment to the SDGs
- MWHT Annual Social Value Plan report
- Bimonthly update on SHEQ Dashboard at the SHEQ and Sustainability Conference Call
- Quarterly RSK ESG (Environment, Social and Governance) reporting on RSK agreed targets
- Quarterly RSK Social Value report in the Thrive platform.
- Overview of company progress against objectives and targets on company intranet, as per Transparency section (8.7)
- Project reporting as per business requirements / expectations including for Project Sustainability and Social Value Plans (PSFR03-09) and PAS2080 compliance

External reporting is undertaken through the following:

- MWHT Website to include overview of company progress against objectives and targets on company intranet, as per Transparency section (8.7)
- RSK Annual Sustainability Report available on the RSK website
- Project reporting as per client's requirements / expectations
- Further details on company progress and reporting provided to clients where requested, i.e. tenders and bids, sharing of best practice

Reporting through Sustainability Assessments and Endorsements:

- Annual completion of Ecovadis assessment including objectives, targets and company progress
- UN Global Compact – annual completion of the Communication of Progress

For PAS2080 compliance reporting (Carbon Management in Infrastructure Standard) or where the client has set carbon reduction targets:

- Reporting to the client as per Framework Sustainability / Carbon Management Plan including, where necessary, including:
 - Predicted carbon emissions in design at appropriate and agreed delivery work stages
 - Reporting carbon emissions on operational activities as appropriate
 - Reporting against client agreed baselines

Further details with regards to PAS2080 are detailed in the Project Sustainability and Carbon Management Manual (MA12).

Further development is underway in assessing the requirements of the Global Reporting Initiative (GRI) and how to adopt within the business and report on the areas material to MWHT activities.

8.9 Continual Improvement

8.9.1 Non-conformity, preventive and corrective action

(Processes SYPD03, EVPD02 and procedure EVPR02)

Where deficiencies are identified as a result of inspections, management system audits or investigations, a Non-Conformance or Observation will be raised, depending on the significance of the finding. The person responsible for the activity, e.g. Project Manager / Site Manager, shall be required to confirm what remedial action is to be taken and the date for implementation. In addition, the root cause(s) of the non-conformance will be determined as well as if similar non-conformances exist or could potentially occur. Where appropriate, Corrective Action will be implemented and logged using the ActivSHEQ platform and where necessary, the relevant client reporting platform. The finding will not be closed out until the Auditor is satisfied that the actions have been completed with sufficient evidence provided (as determined by the Auditor). Where there are repeat corrective actions a review of the effectiveness of these actions will be necessary.

Where an incident or Improve It is reported, the Environmental Advisor(s) shall carry out an investigation, if identified as required. The SYPD08-01 Investigation and Review process will be followed

Risks requiring preventive action may be identified as a result of the review of the Register of Effects, during preparation of the EMP, or as a result of other meetings where environmental matters may be discussed. These may include Design Review, Regional / Framework Meetings, Environment Committees, etc. Recommendations shall be forwarded to an Environmental Advisor.

In specific cases, a derogation from company procedure may be necessary. This will normally be due to client requirements or short-term situations for specific frameworks or projects. In such cases, these derogations must be approved in accordance with the process SYPD06.

8.9.2 Continual Improvement

(Process SYPD05)

Opportunities for improvement will be identified through various means which include:

- Review of incidents and Improve Its
- Audit findings and corrective actions
- Incident investigations and associated corrective actions
- Review of Site Material and Waste Management Plan close outs (on ActivSHEQ)
- Lessons Learnt (on ActivSHEQ)
- Findings and recommendations from external sustainability assessments (e.g. Ecovadis, Business in the Community)
- Feedback including from training attendees, clients and members of the public
- Discussions at SHEQ related and Business Leadership Group meetings
- Reviews of Joint Ventures (JV), JV partners and competitors' activities
- Reviews of PSFR03-09 Project Sustainability and Social Value Plans and completion of the PSFR03-11 Design Build Sustainability and Carbon Checklist.

The appropriate actions will be implemented to ensure the IMS achieves its intended outcomes (see Section 1.2).

In order to enhance MWH Treatment sustainability and environmental performance, the company shall continually improve the suitability, adequacy and effectiveness of the IMS.

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APPENDIX 1: List of Sustainability and Environmental-related processes

MWH TREATMENT IMS PROCESSES	
SYSTEM MANAGEMENT WORKSTREAM PROCESSES	
SY01	SHEQ System Documentation and Records
SY02	Management Review and Action Plans
SY03	Management Systems Audits and Inspections
SY04	Legislation, External Standards and Environmental Effects
SY05	Improvement
SY06	Derogation
SY07	Reporting
SY08	Investigation and Review
SY09	Communications and Consulting
ENVIRONMENTAL WORKSTREAM PROCESSES	
EV01	Environmental Management Plans
EV02	Environmental Auditing and Inspections
EV03	Waste and Resource Management
EV04	Environmental Emergency Preparedness and Response
EV05	Environmental Compliance (Permits, Licenses and Consents)
EV06	Organisational Carbon Footprinting
EV07	Environmental Planning
OTHER COMPANY PROCESSES	
BP02	Customer and Client Communications
BP06	Sustainability
CD04	Filing

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MWH TREATMENT IMS PROCESSES	
CD01	Post Award Meeting
CD02	Project Planning
CD11	Safe Systems of Work
CD14	Control of Construction Work
CD16	Control of Subcontractors
CD18	Control of Concrete
CD20	Site Set-up
CD23	Commissioning
CD24	Temporary Works
CD25	Project Learning
CD30	Site SHEQ Induction and Training Requirements
CD32	Site Safety Emergency Arrangements
CD34	Excavation Operations
CD35	Permits to Work
CD39	Control of Noise
DE02	Design Management
DE08	Safety, Environmental and Sustainability Considerations in Design
FS01	Archiving
FS03	Office SHEQ Management
FS04	Office Safety Emergency Arrangements
HR22	Modern Slavery
HR25	Employee Representation
HS03	COSHH
HS08	Asbestos Management

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MWH TREATMENT IMS PROCESSES	
MW01	Determination of Minor Works
MW02	SHEQ Risk Identification and Control
MW03	Site Management
MW04	Project Management
MW05	Inductions
PM03	Subcontracts
PM05	Subcontractor and Supplier Assessment
PS01	Risk Management at Proposals Stage
PS03	Tender Preparation
SU21	Environmental Management

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