

---

# Waste Management Policy Statement

---

POL-015

John Graham Construction Ltd. (“GRAHAM”) is actively committed to having a net positive impact on resources and adopting a circular economy approach across its operations. Primarily we aim to reduce the Company’s overall consumption and usage of raw materials. Aligned to this we aim to keeping products and materials at their highest utilisation throughout their lifecycle. We also promote recycling and the benefits of utilising recycled materials. However when disposal is the only option, we will seek to dispose of materials in an environmentally sensitive and responsible manner. In order to accomplish this aim we:

- When possible avoid, then minimise, waste streams of high volume and high cost
- Adopt solutions that minimise our plastic impacts and reduce the amount of plastic we use, especially single-use items
- Develop Site Waste Management Plans (SWMP) for each site in order to accommodate effective waste management and minimise the risk of pollution.
- Audit potential Waste Management Suppliers pre appointment to ensure they are of an acceptable standard.
- Give guidance and information to staff to facilitate their participation in the recycling of their waste
- Encourage suppliers to design packaging materials in accordance with a circular economy perspective
- Encourage the purchase of products with recycled content; also select products and materials with recycling potential.
- Minimise waste by encouraging the exchange, and reuse of equipment and materials amongst departments.

GRAHAM understands that the correct handling, storage and disposal of waste materials is vital to ensure compliance with environmental legislation and for pollution prevention. GRAHAM ensures it keeps abreast of changes in the legal framework to fully comply with the Duty of Care responsibilities. GRAHAM consults routinely with the regulator to ensure best practice is adopted and legal duties are fulfilled.

We encourage co-operation and co-ordination between our employees, subcontractors and clients toward the shared goal of reducing waste at its source, reusing and recycling waste wherever possible. A GRAHAM ‘Environmental Champion’ is appointed on active sites to facilitate this.

We will acknowledge, respond appropriately, and take into account of the views of the public and any other interested parties with respect to our operations. In addition, this policy statement will be communicated to all persons working for and on behalf of GRAHAM.



ALAN BILL  
MANAGING DIRECTOR  
John Graham Construction Ltd.