

30.38 Sustainability Policy

Cairn Cross will seek to reduce greenhouse gas emissions associated with its operations, projects, fleet, plant, energy use, transport, materials and supply chain activities. Where required by clients or tender requirements, the Company will develop and maintain a Carbon Reduction Plan aligned with applicable procurement requirements, including PPN 006 where relevant.

The Company will monitor appropriate carbon-related indicators such as fuel use, electricity use, vehicle mileage, plant utilisation, waste movements, material choices and supplier impacts.

The company is fully committed in our approach to sustainable development; decision making will be made with environmental commitment at the forefront. Where possible the Cairn Cross Group aims to implement the following core sustainable principles:

- Usage of Prefabricated Materials
- Procuring Timber from sustainable sources
- Social & Ethical Procurement of Materials
- Reusing waste to landfill
- Procuring materials & services locally
- Reducing the number of miles driven

Prefabricated Materials

Prefabricated materials will be utilised wherever possible on live projects to reduce on site cutting works, assembly, and construction to both reduce potential wastage of materials (Material off cuts). Reduce construction phase durations, therefore consequently associated site fuel costs and impact on the surrounding environment.

Timber

It is the policy of the Company that ALL timber and wood-derived products are required to be purchased from independently verifiable legal and sustainable sources.

Cairn Cross recognises that the production and manufacture of timber-based products has significant economic, environmental and social impacts. Sustainable forest management is about preserving forests as a source of life for all that depends on it. We believe that timber should be harvested in such a way that it does not threaten the range of associated goods and services that forests provide in contributing to human well-being, poverty alleviation and sustainable livelihoods.

A Timber Purchasing Policy is a valuable tool to help tackle the challenges of illegal logging, deforestation, and climate change, and to help us meet our sustainability objectives. Therefore, our long-term intention is to source all timber products used by the Company from sustainably managed forests. Our Policy recognises the responsibility of the Company to ensure that we have neutral, if not positive effect on the world's forests.

ALL timber and other wood products bought by or used by the Company must be from independently verifiable sources only and traceable from the forest to the final processor through a "Chain of Custody".

Recycled wood is preferable if it meets the technical specification required.

Suppliers are required to demonstrate compliance with the Company Policy and provide adequate supporting evidence upon request.

The Company will;

- Procure products from legal and well managed forests which are certified under third party certification schemes such as the Forestry Stewardship Council (FSC) Scheme and the Programme for Endorsement of Forest Certification (PEFC) Scheme
- The Company will support clients in delivering sustainable outcomes and maximising public benefit under relevant procurement requirements, including the Procurement Act 2023, the National Procurement Policy Statement and applicable social value or sustainability procurement requirements.
- Accept other documentary evidence that provides assurance that the source is sustainable.
- Accept Forest Law Enforcement, Governance and Trade (FLEGT) licensed timber, when offered – up to 2015
- Specify that the timber in question is “fit for purpose” rather than demanding species, where possible. This gives the supplier more flexibility in finding sustainable timber sources.
- Approve suppliers based on an assessment of their procedures and verification processes relating to the sources of timber.
- Apply ambitious targets in the implementation and rollout of this policy to increase the volume of timber purchased in compliance with the policy, and to measure our progress against these targets, and maintain a transparent audit trail.

Social & Ethical Procurement of materials

We are committed to ensuring our procurement activity is outcome-focused with well-defined deliverables that cover environmental, social, and economic issues such as reducing CO2 emissions, promoting equal pay and providing opportunities for SMEs and other diverse suppliers. Cairn Cross is dedicated to ensuring the social & ethical procurement of materials sourced for all our live projects, through actively implementing the following core principles listed below.

- Increase vetting procedures of approved supply chain members to ensure all materials purchased have been sourced from sustainable and ethical means.
- Encourage sustainable procurement, by encouraging local Sourcing and Procurement of goods, Products, and services.
- Upcycling of existing available on-site materials/ structures to reduce procurement of new materials.
- Opting for more environmentally friendly products/solutions for example geotextile products over conventional industrial herbicides to reduce potential soil and surface water run off pollution.
- Site Managers producing accurate material take offs and reduce left over materials and potential waste
- Regularly conducting stock takes of surplus materials previously left over items from other projects that can be reused again (e.g. fixings, GRP grating, timber, cabling)

Procuring Local Materials

CCCE wherever possible will actively Encourage sustainable procurement, by encouraging local Sourcing and Procurement of goods, Products and services from the local materials and markets close to site to reduce potential delivery material miles, as an active effect to reduce our carbon footprint, whilst also supporting the local micro economy of the site. Local available materials will be clearly highlighted on each procurement schedule to assist the procurement and the site team.

Car sharing scheme

Cairn Cross is conscience of increases to our carbon footprint especially the number of personal miles to site by car sharing wherever possible.

New vans have been fitted with tracking boxes to enable miles driven KPI's to be recorded more accurately, as well as improving more economical driving behaviours amongst CCCE employees.

Reusing the number of materials transported to landfill

Wherever possible Cairn Cross will make conscious effort to reduce the amount of waste generated on live construction sites being sent to landfill. This will be achieved through implementing the following initiatives:

- Utilising onsite spoil heaps for inert muck away
- Recycling existing construction debris into usable Type 1 with onsite crusher
- Usage of woodchippers to reduce off site waste associated with de-vegetation works.
- Reusing timber off cuts and surplus timber for concrete shuttering purposes

To ensure this policy is implemented effectively, the Company will; •

Incorporate this policy's requirements across all functions of the Company.

- Embed it in our supply chain and procurement processes.
- Bring this policy to the attention of our employees.
- Actively encourage and engage suppliers in its implementation.
- Periodically review the Policy to ensure continuing sustainability.

Biodiversity and nature protection

Where relevant to the project scope, planning requirements or client specification, Cairn Cross will support biodiversity protection and biodiversity net gain requirements. This may include protecting existing habitats, avoiding unnecessary vegetation clearance, preventing pollution, supporting ecological controls, protecting watercourses, managing invasive species, and providing evidence required by clients or planning conditions.

Signed

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Date 07th May 2026

Phil Williamson
Managing Director