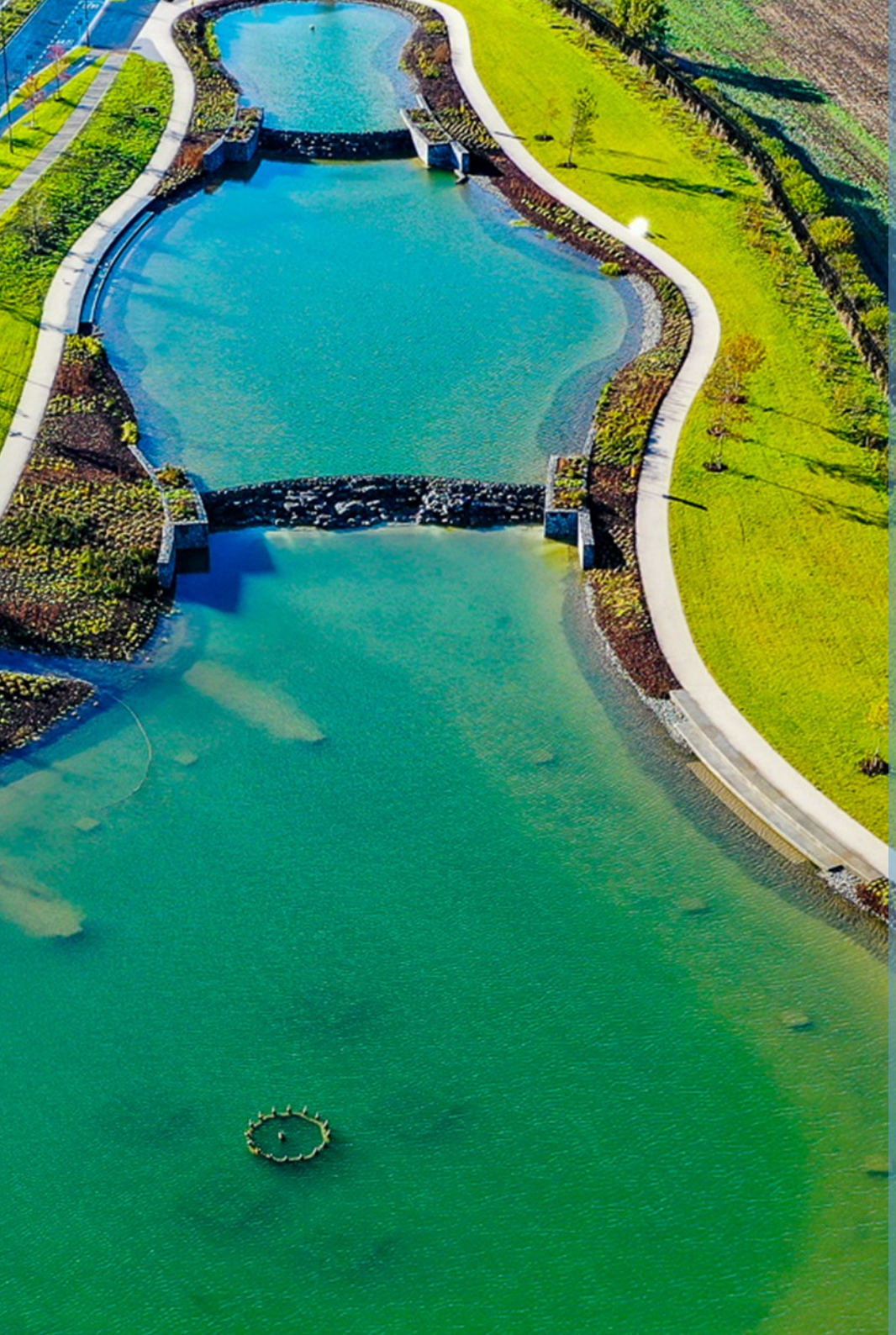
SUSTAINABILTY STRATEGY

CLONMEL
ENTERPRISES
BUILDING & CIVIL ENGINEERING



Introduction

Clonmel Enterprises Ltd are a civil engineering and building company established since 1974. The company recognises that its activities can have wide reaching effects on the environment and society. In addition, the company acknowledges the corporate governance legislation that is applicable within this jurisdiction. The company has introduced several management systems to manage both compliance and as a tool to aid in evaluating their effects on society and the environment. In 2007 the company established and gained certification for their health and safety (Safe-T Cert) and quality management systems (ISO9001). In 2014, the company received formal ISO14001 certification for their health, safety and environmental management system followed by ISO45001 certification in 2020 and in 2022 the company gained ISO27001 certification for their information security management system. These certifications have provided a framework for the company to establish impacts and better understand how to manage minimisation of them.

CLONMEL
ENTERPRISES
BUILDING & CIVIL ENGINEERING

Message from Eamonn Stapleton MD

The built environment might contribute as much as 40% of the world's greenhouse gases. The embodied carbon, which is a consequence of the construction of the built environment contributes approximately 12% of worlds greenhouse gases. In an industry that generates so much emissions by its very existence, having a sustainability strategy is essential. It is not good enough to say 'there is nothing we can do about it, we are only doing what we are asked to do'. Every effort counts and every effort might influence a similar effort from others. Our sustainability strategy is in its infancy as most other businesses are, but it is built on years of working within certified management systems which gives us the basis to measure what we are doing. This is the starting point of a sustainability strategy. Understand what you are doing, measure it, record it and develop a strategy to improve. If our strategy is to have any meaningful impact it will have to be revised and updated as we and all contributors to the industry improve their knowledge. So we ask our employees, our supply chain and our clients to work with us and hopefully as a team we can meaningfully impact our emissions.

Context of the organisation

As a civil engineering and building company, the company's activities have the potential to have a significant negative effect on the environment through works which can involve the use of finite resources, have the potential to contaminate water sources and require the use of fossil fuels. The organisation has other impacts as an employer directly and indirectly through our suppliers and subcontractors as well as an effect on the health and safety of both those working on sites as well as members of the public.

Stakeholders

As part of the company's ISO HSEQIS management systems, the interested parties and stakeholders have been identified. Using information gathered from a variety of sources, the management of the company have carried out an assessment under the topics listed in figure 1 of the impact that the company may have on the relevant topics as well as an assessment of how these factors can affect the company, the results are represented on the graph labelled Stakeholder map.

ENVIRONMENTAL

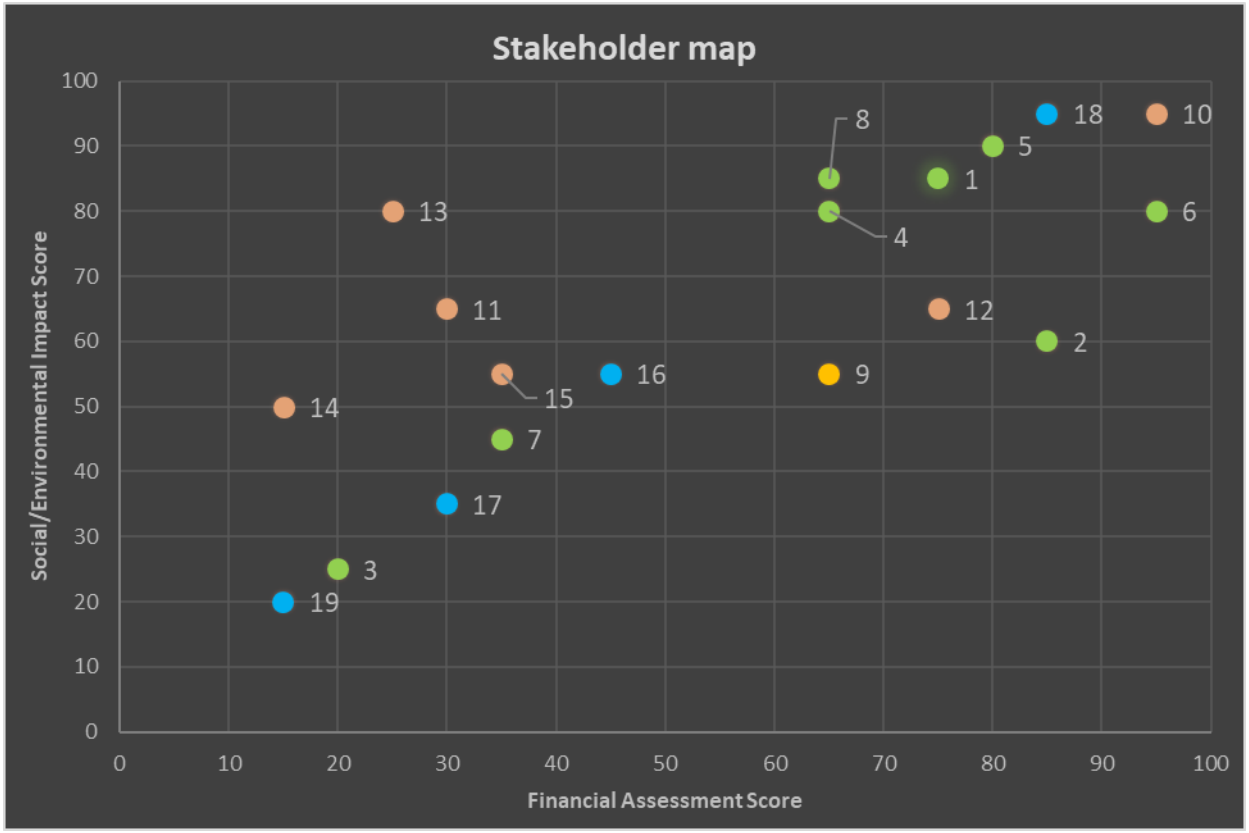
- 01 Materials
- 02 Energy
- 03 Water
- 04 Biodiversity
- 05 Emmissions
- 06 Waste
- 07 Suncontractor Environmental Assessment
- 08 Supplier Environmental Assessment

SOCIAL

- 09 Employment
- 10 Occupational Health & Safety
- 11 Training & Education
- 12 EDI
- 13 Supplier Social Assessment
- 14 Human Rights Assessment
- 15 Local Communities

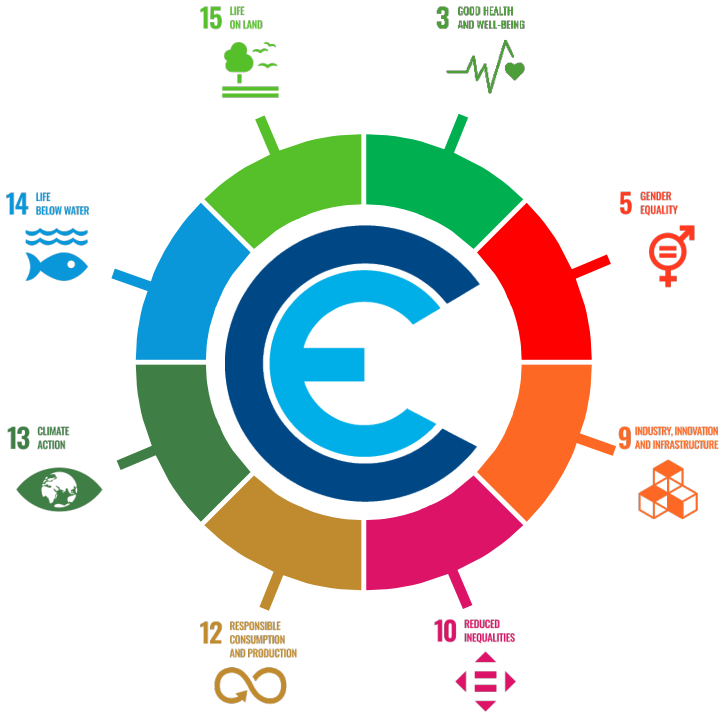
GOVERNANCE

- 16 Anti-Corruption
- 17 Socioeconomic Compliance
- 18 Customer Health & Safety
- 19 Customer Privacy



Sustainability Goals

The Stakeholder map analysis has been carried out and the areas where the company has the most impact have been identified. These are the topics that are located in the top right hand quarter of the graph. The company's overarching goal is to carry out our works while working in sustainable manner. We aim to work with our surrounding environment within the constraints of our Clients requirements and the planning permissions they have been granted for their projects. In our Headquarters, where the company has control over the choices that are made we are committed to reducing the impact of the company using our long term sustainability goals. We have set the following goals which we will be further exploring in this document.



Sustainability Goals	Key Staff Roles	Overall Responsibility
To minimise the impact of the business on climate change	Contracts Directors, Quantity Surveyors, HQ Buyers, Plant Manager	Eamonn Stapleton
To reduce the use of finite resources in our works and waste produced.	Project Managers/Quantity Surveyors/Site Foremen	Niall McElwaine
Ensuring that our workplace is inclusive and equitable and that our recruitment and HR practices are robust ensuring that the unconscious bias is addressed in recruitment.	Recruitment Manager/Contracts Directors	Eamonn Stapleton
Ensure that our permanent and temporary site offices are sited and managed to encourage biodiversity .	Project Manager/Site Foremen/Office Manager	Thomas Corcoran

Climate Change

Assessment

CEL have assessed the potential impacts on the company that may occur as a result of climate change as well as assessing the potential impacts the company's activities have on the climate. The potential impacts on the company are:

- Financial due to increased carbon taxes and fuel and energy costs
- Supply chain restrictions due to flooding, lack of availability and legislative restrictions on virgin aggregate materials

The potential impacts that may result from the company's activities are as follows:

- Carbon emissions from the company's direct activities such as fuel consumed by plant or powering offices as well as from the supply chain
- Positive impacts from improved infrastructure
- Potential for water pollution if controls are not implemented on our sites along with use of water for construction activities

Strategy

The main strategy to mitigate the potential negative effects of climate change is to identify and monitor carbon emissions and work to reduce these emissions. The carbon emissions are being measured in accordance with the Green House Gas Protocol. A baseline for scope 1 and 2 emissions was established in 2021 with reductions seen to date. Measurement of the various categories of scope 3 emissions are underway with the baseline for our waste emissions established in 2021 with some upstream transport added in 2022. In 2023 scope 3 employee commuting was added. This will be expanded in 2024 adding additional measurements for more categories. We also intend to split our measurements and targets for our projects and our own offices as the projects emission are somewhat dependent on the Designer and Client requirements whereas the company has control over the office set ups.

Metrics and Goals

The company commits to reducing our carbon intensity and achieving net zero by 2050 with a 50% reduction sought by 2030.

The company in 2023 identified the priority scope 3 categories to be reported in 2024 based on those that we could obtain accurate information for along with categories we believed we were best placed to address.

Annually the company as part of the Annual Management Review will set short term targets and objectives that will feed into achieving our longer-term goals that are included here.

Waste

Assessment

As a construction company waste production is a result of some of the company's activities. This has potential impacts both on the company as well as on the surrounding environment. The potential impact on the company may be:

- Financial due to increased waste disposal costs as well as increased costs to transport waste
- Lack of facilities to accept waste

The potential impacts that may result from the company's activities are as follows:

- Affecting the natural environment where the waste is placed, potential for ground pollution if the waste facility is improperly managed
- Increased emissions from transporting, treating and managing waste

Strategy

Waste is being measured as a scope 3 emission since 2021 and the figures have reduced in that time. CEL are committed to the circular economy and work with our Clients to propose ways of eliminating waste on the project in line with the circular economy. Where waste cannot be eliminated on a project and alternative uses can be found for the material CEL are committed to using Article 27 and Article 28 mechanisms to reuse the material.

On our projects we are committed to using waste disposal companies that will provide a breakdown of the contents of skips that are not segregated on site. On some of our projects, we do not have the waste volumes to allow for segregation of the skips. Where volumes are greater, wood, plastic and other waste are segregated. In HQ waste is segregated.

We have started a move to digitisation of many of our operational systems which is allowing us to reduce our paper usage within the business which in turn can aid in reduction of waste.

Metrics and Goals

Continue to monitor waste levels and commit to using Article 27 and 28 mechanisms to dispose of material as a useful product instead of a waste product from our sites.

In our HQ we intend to reduce waste by 50% by 2030 and paper usage by 75% by 2030 from our baseline year of 2022.

Suppliers and Subcontractors are assessed to determine their commitment to sustainability and how they minimise waste in their specialist work on our sites.

Equality, Diversity and Inclusion

Assessment

Company's operating strong EDI policies and procedures have been proven to have increased success by aiding in improving ideas and problem solving within the management of the company. Strong EDI policies and culture within a company can also benefit the company by reducing potential legal issues. The potential impacts on the company by not focusing on EDI are as follows:

- Reputational damage to the company
- Potential risk of discrimination, bully or harassment occurring within the company and the associated costs

The potential impacts that may result from the company's activities are as follows:

- Reduced success and ability to serve our Clients
- Poor employee retention and a reduced pool of available resources

Strategy

Continue our EDI journey with the Irish Centre for Diversity to ensure that our company continues to be able to grow and adapt to an ever changing world.

Continue to work with community groups such to provide opportunities for people that are outside of the workforce to open up opportunities for them to re-engage. LEAP Careers Service, providing internships with local ETB and Transition Year students are ways that CEL have engaged in the past and will seek to continue engagement going forward

Employ a diverse workforce which is proven to improve a company's overall performance by allowing for more expansive thinking

Metrics and Goals

Monitor our recruitment process to ensure that bias, unconscious or otherwise is not impacting adversely on this process

Carry out internal gender pay gap review based on 2023 in advance of our mandatory reporting year

Engage with education facilities to offer opportunities for students to experience construction – TY students, ETB courses, LEAP Career Services, IASO

Maintain our Silver status with the Irish Centre for Diversity.

Biodiversity

Assessment

As a construction company, CEL has the potential to impact significantly on the surrounding environment when carrying out their works. These impacts can be negative and positive depending on the controls and strategy the company employs. The risks to the company are:

- Risk of fines if our controls are not implemented and a pollution event occurs
- Risks to supply chain for timber, aggregate and fuel supplies

The potential impacts that may result from the company's activities are as follows:

- Removal of vegetation impacting on flora and fauna in the course of our works
- Potential for pollution to watercourse in the course of our works

Strategy

As a member of the Irish Pollinator Plan CEL are working to restore biodiversity at our HQ in Naas. While we have controls in place on our sites that mitigate the effect of our operations on biodiversity in line with the planning permission EIA requirements. Additional assessments are undertaken by our staff in advance of all projects to ensure that controls identified and put in place to reduce the potential for pollution events occurring

Our goal is to maximise the available green areas at our HQ to allow biodiversity to be re-established as much as possible.

Metrics and Goals

Continue to minimise mowing of the grass areas at HQ in line with best practice and carry out Flower Insect Timed Counts to start to monitor the effectiveness of the reduced mowing regime

Evaluate the temporary compound areas to minimise impact on existing vegetation and hedge lines

Evaluate the insect hotels and relocate if not being used at HQ

Continue to work with our Clients to ensure that we continue to implement best practices on our sites to control emission such as dust, noise, vibration and traffic.