Pollution Prevention Plan

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1. INTRODUCTION

Viberoptix is a tier-one contractor specialising in building fibre broadband networks for both rural and urban communities across the United Kingdom and Ireland. The company is committed to delivering fast, reliable fibre-optic broadband to remote and hard-to-reach areas. While Viberoptix prioritises utilising existing telecom infrastructure to install fibre-optic cables, it also constructs new infrastructure when necessary.

The processes involved in constructing fibre networks carry a risk of environmental pollution throughout the project lifecycle. These risks include accidental spillages leading to soil and water contamination, emissions from fuel usage impacting local air quality, dust generation, and noise pollution. The Pollution Prevention Plan (PPP) outlines the measures required to mitigate these risks and ensure compliance with environmental legislation and standards.

1.1. Purpose of the Pollution Prevention Plan

The management of potential pollutants from operations is essential to avoid harm to human health and the environment, including soil, groundwater, surface water, and ecosystems. The purpose of the PPP is to:

Outline the key policies, legislations and standards relating to pollution control.

- Outline key policies, legislation, and standards related to pollution control.
- Define roles and responsibilities in pollution prevention.
- Specify actions and measures needed to prevent pollution effectively.
- Address accidental and intentional emissions to air, water, soil, and noise.
- Detail pollution control measures applicable to Viberoptix and its contractors/subcontractors.
- Implement project-specific environmental mitigation measures.
- Incorporate sound environmental practices into all company procedures.

1.2. Scope of the Pollution Prevention Plan

The Viberoptix PPP covers all activities, including but not limited to office work, surveying, groundworks, construction, cabling, poling, warehouse storage, and logistics operations. The plan applies to Viberoptix staff as well as contractors and subcontractors working on the company's behalf. It also extends to land and properties leased or temporarily affected by Viberoptix operations.

This plan will enhance the management of potential environmental impacts across all operations. The control measures outlined will be integrated with existing environmental management procedures that address different aspects of the company's activities. Relevant documents include:

- **VO-ENV-04**: Aspects, Impacts and Legal Register.
- **PRO-EN-01:** Pole Handling and Storage Procedure.
- **PRO-EN-02:** Waste Management and Duty of Care Procedure.
- **PRO-EN-03:** Environmental Spillage Procedure.
- **PRO-EN-04:** Tree Management Procedure.
- **PRO-EN-05:** De-Watering and De-Silting Chambers Procedure.
- **PRO-EN-06:** Noise Management Procedure.

- **PRO-EN-07:** Dust Suppression Procedure.
- **PRO-EN-08:** Biodiversity Management Procedure.

1.3. Objectives of the Pollution Prevention Plan

- Establish procedures to manage environmental incidents promptly and effectively, ensuring legal compliance and minimising pollution risks.
- Provide guidance on pollution prevention and methodologies for addressing unexpected or accidental pollution events.
- Outline measures for reporting environmental incidents and preventing recurrence, including staff/crew training and awareness programs

1.4. Legislation and Guidance

Although most of the project routes utilise existing infrastructure, the construction of new infrastructure may be required in certain sensitive areas, which are protected by statutory legislation and regulations.

Viberoptix follows applicable standards documented in company procedures and the aspects and impacts register. Compliance with ISO 9001 and ISO 14001 demonstrates the company's commitment to maintaining an effective Quality Management System (QMS) and continually improving service quality, sustainability, and processes.

1.5. Company Policies

Viberoptix has established policies that set operational standards for employees and subcontractors. These policies comply with statutory obligations and align with required management systems.

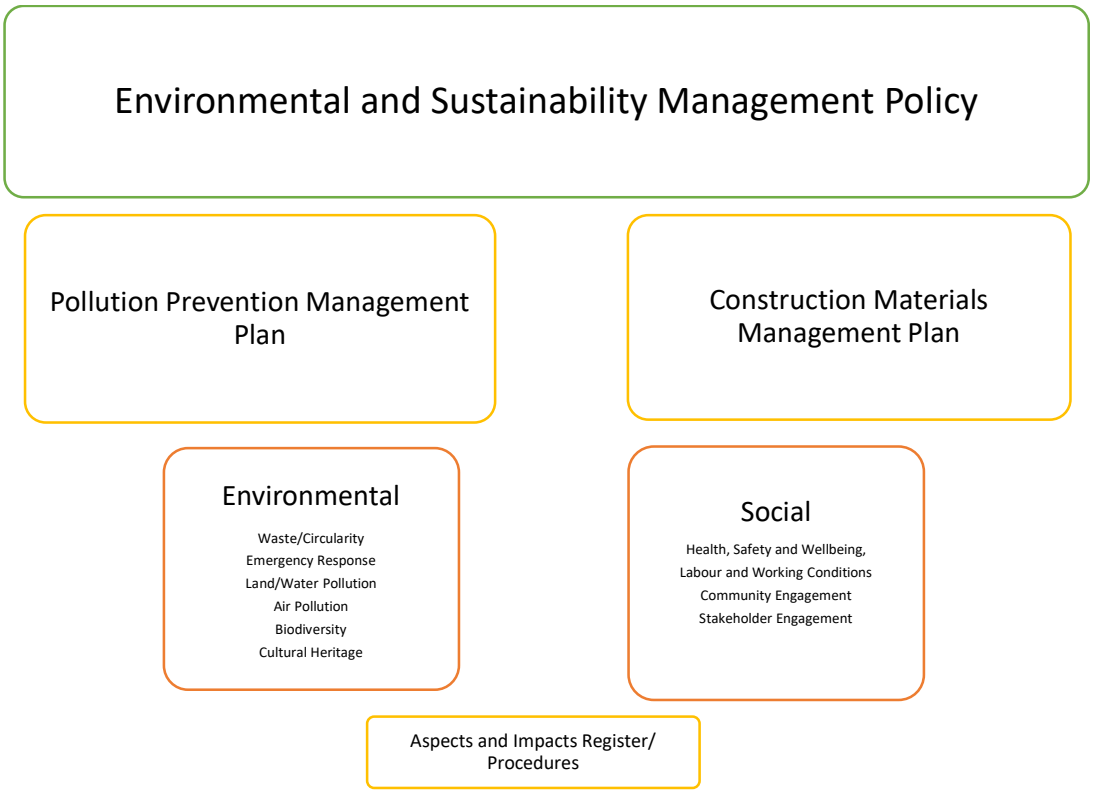
1.6. International Standards and Commitments

Viberoptix adheres to a range of international standards and commitments at both regional (EU) and global levels. While many EU directives no longer apply in the UK post-Brexit, many of these have been incorporated into UK law. All contractors are required to comply with these regulations as they pertain to their activities.

1.7. Linkage of other Elements in the Company with Pollution Prevention Plan

The Viberoptix PPP is an integral part of the overall Environmental Management System (EMS). It is also incorporated into the project-specific Environmental Management Plan (EMP) and HSE-MS, ensuring comprehensive environmental and safety compliance across all operations.

Figure 1: Schematic of linkage of Pollution Prevention Plan with existing environmental control systems in Viberoptix



2. POLLUTION CONTROL & KEY RESPONSIBILITIES

Pollution prevention in Viberoptix operations requires the active participation of all stakeholders, including employees, subcontractors, local authorities, regulatory agencies, and the general public. To effectively prevent pollution, a comprehensive system must be in place that involves information sharing, training, clear designation of responsibilities, monitoring, management actions, and, when necessary, corrective measures.

Strong cooperation is essential to ensure the successful implementation of the Pollution Prevention Plan, particularly at the site and ground operations level. Developing site-specific operational procedures is crucial to achieving effective pollution prevention.

2.1. Company Roles & Responsibilities

Viberoptix's responsibilities for managing environmental issues are outlined in the company's policies and procedures. In relation to this Pollution Prevention Plan, Viberoptix is accountable for key activities, including:

- Establishing pollution control requirements.
- Providing training and raising awareness among staff and representatives on site.
- Conducting surveillance and ensuring compliance.
- Consequences for non-compliance.
- Managing pollution arising from its operations

2.2. Contractors and Subcontractors Roles and Responsibilities

Contractors and subcontractors working on behalf of Viberoptix are required to implement all relevant Viberoptix Environmental Control Measures, including those outlined in the Pollution Prevention Plan. According to the "polluter pays" principle, contractors and subcontractors hold responsibility for pollution control on-site. They must also submit plans detailing:

- Pollution prevention and management strategies for the site.
- Spill recovery and emergency response plans for potential incidents.

If contractors do not have their own Pollution Prevention Plan, they must agree to and comply with the Viberoptix Pollution Prevention Plan.

3. POLLUTION MANAGEMENT, MITIGATION & MONITORING

Pollution management, mitigation, and monitoring measures are essential to prevent pollution during all site operations. Every work activity must consider the risk of pollution, and a method statement must be prepared for each task. Environmental incidents and actions are logged in the company's management system to monitor trends, gather data on pollution events, and support the development of training programs. This also helps raise awareness and prevent future occurrences. Civil works and cabling activities are continuously assessed for potential pollution risks, with mitigation strategies put in place accordingly.

3.1. Pollution Prevention Measures

Table 1 outlines potential pollution activities, the affected environmental media, and the preventive measures implemented to mitigate the environmental impacts of Viberoptix's activities. These preventive measures are developed in collaboration with work crews, environmental audit findings, and best practices from government guidelines. Site-specific risk assessments and daily audits are conducted to identify any potential or actual risks during operations. A summary of potential pollution sources and corresponding control measures is provided in Table 1.

Table 1: Potential Pollution sources and their proposed prevention/control measures.

Potential Pollutant	Way of release	Prevention
Emission to Land and Water and Waste Pollution:	Office and Site Waste Management	Follow the Waste Management Procedure PRO-EN-02 Ensure the Waste Broker, Carrier and Contractors have valid licenses/transfer notes/season tickets for removing all waste off-site. Ensure office waste bins are easily accessible across all VO Site Segregated and signage for bins to avoid cross contamination.
Generation of Dust as a result of construction activities	Release of dust into the air	Ensure operational staff are trained on the use of the equipment and suppression measures. Installation of Dust Suppression Measures.
Emissions to air arising from use of Plant & Equipment	Release of emission such carbon monoxide (CO), NOX and particulate matter (PM10 and PM25). Contribution to greenhouse gas emissions, such as carbon dioxide (CO2)	Company and lease plant and equipment are regularly serviced, and records are comprehensive. Lease equipment to be swapped out for newer models. ESG reporting of emission data via SustainIQ Switch off equipment and plant when not in used Crews to complete regular plant and equipment checks, (maintenance) All issues or incidents must be reported to Plant & Equipment Manager and Team. Implement mitigation and control measures
Noise, Vibration and lighting of operational activities, including night time works.	Noise, Vibration and light pollution emanating from groundwork activities	Follow the Night-Time work procedure. Ensure lights and noise generating equipment are only used when necessary Crews are to be trained in the correct orientation of light beams at night. Crews to be made aware of sensitive receptors. Send out Neighbour Notification forms ahead of night time works.
Accidents/Incidents/improper storage of fuels and oils (COSHH) (i.e. environmental spillages or waste overflows) leading to potential pollution	Failure of fuel, oil and chemical storage facilities	Waste management policy and procedure in place. Waste Duty of Care obligations. All vans are to hold an environmental spillage kit. All COSHH Materials are to be appropriately labelled and stored within a bunded area while on site. Refuelling activities are undertaken away from watercourses (including storm drains) and sensitive receptors (i.e. vegetation) on the hard-standing ground within a plant nappy or drip tray. Follow procedures on Environmental spillage PRO-EN-03
Contamination of non-hazardous waste through contact of hazardous waste containing, bitumen, asbestos, etc.	Failure to segregate hazardous waste materials from non-hazardous waste material on-site or in transit.	Street Works UK protocol waste flow chart and procedure is in place. All sub-contractors must commit to follow the procedure and carry out the necessary lab and onsite tests. Waste Transfer Notes and Hazardous Waste Consignment Notes must be recorded by ALL subcontractors, waste brokers and sent to the ESG team.

3.2. Additional Mitigation and Pollution Control Measures

The ESG Team will collaborate with Project Managers and Build Teams to ensure pollution prevention protocols are effectively implemented. Site Supervisors are responsible for ensuring that appropriate pollution response equipment is available at all site locations and for reporting any major environmental issues.

3.3. Staff Training and Awareness

The ESG Team will develop and deliver toolbox talks addressing environmental concerns. Continuous environmental awareness programs will be held monthly and at key phases of the company's operations. The following information will be communicated to all staff, contractors, and subcontractors before and during groundworks:

- All personnel must understand the environmental sensitivities at each project site and be aware of their roles and responsibilities.
- Employees, contractors, and subcontractors will be informed about what constitutes a pollution incident, emergency contact information, and the procedures for reporting incidents through inductions, training, and toolbox talks.
- All staff, contractors, and subcontractors are required to acknowledge and adhere to Viberoptix's environmental management procedures during inductions, toolbox talks, and follow-up training sessions.
- Contractors and subcontractors must ensure that relevant personnel are trained in pollution prevention and response procedures, including participation in toolbox talks, environmental briefings, and stand-down days.

3.4. Pollution Prevention Emergency Planning

Emergency Contact Details

The ESG Team's emergency contact details will be made available for reporting all environmental and pollution incidents. The Senior ESG Manager will be responsible for responding to emergencies, and may delegate tasks to ensure appropriate monitoring and action. All pollution events will be recorded in the company's management system, with follow-up action plans and investigations conducted by the ESG Team. The team will also communicate lessons learned from incidents to all staff, contractors, and subcontractors.

Emergency Response

VO has developed a documented emergency response plan for foreseeable pollution incidents. This plan outlines the actions to taken in case of such events and includes:

- Environmental spill response.
- Responses to containment failures or fuel/oil storage facility breaches.
- Waste management incident response

Incident Response Plan

The ESG Team will produce an incident response plan that details the necessary information for effective responses to potential pollution incidents on-site. Site Managers or Supervisors are required to report all incidents through the company's management system so that the ESG Team can respond appropriately.

4. VERIFICATION, MONITORING & REVIEW

4.1. Verification

Verification monitoring of reported pollution incidents will be conducted to ensure proper review of the Pollution Prevention Plan (PPP). Verification will be carried out through:

Management System Audits: These audits evaluate the continued suitability of VO's Environmental Management System (EMS) throughout the project lifecycle.

Pollution Prevention Audits: The ESG Team will perform these audits to ensure all company staff, contractors, and subcontractors comply with the PPP.

Self-Audits: Supervisors, contractors, and subcontractors will participate in self-reporting to confirm compliance with the PPP and their EHS commitment.

Regulatory Audits: The ESG Team, in conjunction with site compliance inspections, will monitor adherence to applicable regulations.

4.2. Monitoring

Monitoring the effectiveness of the Pollution Prevention Plan is critical for assessing its performance. Monitoring activities will include:

- **Risk-Based Monitoring:** This approach uses a source-pathway-receptor model, focusing on the material issues and assessing the potential for pollution based on the nature and scale of the work.
- **Compliance-Based Monitoring:** VO will carry out monitoring programs to meet specific regulatory requirements.

4.3. Review of Pollution Prevention Plan

The ESG department will periodically review the inventory of potential pollutants and control measures, updating the PPP as necessary. As a minimum, the PPP will be reviewed annually by the ESG Team or more frequently if new information, procedural changes, or legislation updates arise.

Site-specific risk assessments will be conducted daily by field crews, with monthly monitoring to evaluate risks and control measures. Regular review meetings will be held during field operations to discuss associated risks, ensure best practices are followed, and assess the PPP's effectiveness.