

POLICY STATEMENT

DBD is committed to conducting all business activities in a manner that protects the environment, prevents pollution, supports sustainability, and contributes to the responsible delivery of services within the nuclear and other highly regulated industries. We recognise that our activities, services, and business decisions can have both direct and indirect environmental impacts. Through effective environmental management, we seek to minimise adverse impacts, enhance positive environmental outcomes, and support the transition to a low-carbon and sustainable future.

This policy applies to activities undertaken from DBD premises, client sites, nuclear licensed facilities, and all other locations where our personnel undertake work on behalf of the business. We are committed to providing adequate resources, training, awareness, and professional support to enable effective environmental management and to ensure that our personnel uphold the highest standards of environmental responsibility wherever they work.

This policy forms part of DBD's Business Management System (BMS) and provides the framework for establishing, reviewing, and achieving environmental objectives and targets in accordance with ISO 14001.

PURPOSE

The purpose of this Environmental Policy is to define DBD's commitment to environmental protection, sustainable business practices, pollution prevention, and the continual improvement of environmental performance. This policy establishes the framework for the effective implementation, maintenance, and continual improvement of DBD's Environmental Management System (EMS), which forms an integral part of the Business Management System (BMS).

It demonstrates our commitment to:

- Protecting the environment.
- Preventing pollution.
- Fulfilling compliance obligations.
- Managing environmental risks and opportunities.
- Continually improving environmental performance.
- Integrating environmental considerations into business planning and decision-making.

The policy supports DBD's strategic objectives and commitment to responsible business conduct and sustainable development.

SCOPE

This policy applies to all DBD business activities, services, locations, and personnel, including employees, associates, contractors, consultants, and others working on behalf of the organisation.

The scope includes:

- Consultancy, engineering, programme management, project management, technical advisory, and professional services delivered by DBD.
- Activities undertaken within DBD offices, client premises, construction sites, nuclear licensed sites, and any other locations where DBD personnel perform work-related activities.
- Environmental aspects and impacts associated with business operations, including energy use, resource consumption, procurement, business travel, waste generation, digital operations, and supply chain activities.
- Environmental impacts that DBD can directly control or indirectly influence through the services it provides and the decisions it makes.

DBD recognises that, as a consultancy supporting the nuclear industry and other highly regulated sectors, the advice, designs, programmes, projects, and technical solutions we provide can influence environmental performance throughout the lifecycle of assets, facilities, infrastructure, and major projects.

Environmental considerations shall therefore be integrated into business planning, project delivery, risk management, and decision making processes wherever reasonably practicable.

LIFECYCLE PERSPECTIVE

DBD applies a lifecycle perspective to the services it provides and the goods and services it procures. We consider environmental impacts and opportunities throughout the stages of a project, asset, or infrastructure lifecycle that we can control or influence.

This includes consideration of:

- Concept development and feasibility studies.
- Design and engineering activities.
- Procurement and supplier selection.
- Construction and commissioning.
- Operation and maintenance.
- Modification and life extension.
- Decommissioning and demolition.
- Waste management and final disposal.

As a consultancy supporting major infrastructure and nuclear sector projects, DBD recognises that decisions made during the earliest stages of planning and design can significantly influence environmental performance throughout the lifetime of an asset.

Where appropriate, DBD will support clients by:

- Reducing whole life environmental impacts.
- Considering whole life carbon emissions and climate change impacts.
- Improving resource efficiency and sustainable use of materials.
- Applying waste minimisation and circular economy principles.
- Supporting sustainable procurement practices.
- Considering biodiversity and ecological impacts.
- Evaluating environmental risks associated with operation, maintenance, decommissioning, radioactive waste management, contaminated land, and end-of-life asset disposal.
- Supporting the achievement of environmental, sustainability, ESG, and net-zero objectives.

DBD COMMITMENTS

- Protecting the environment through pollution prevention, sustainable resource use, climate change mitigation and adaptation, biodiversity protection, and the responsible management of environmental impacts.
- Complying with all applicable environmental legislation, regulations, permits, customer requirements, and other compliance obligations relevant to our business activities and services.
- Maintaining, monitoring, and continually improving our Environmental Management System in accordance with ISO 14001, including the establishment and review of environmental objectives, performance measures, risks, opportunities, and improvement initiatives.
- Identifying, assessing, and managing the environmental aspects, impacts, risks, and opportunities associated with our operations, business activities, and consultancy services.
- Promoting efficient use of energy, water, materials, and other natural resources, while reducing waste generation, improving recycling, and minimising greenhouse gas emissions where reasonably practicable.
- Integrating environmental and sustainability considerations into our consultancy, engineering, project management, programme delivery, procurement, and advisory services, applying a lifecycle perspective to the projects and assets we influence.
- Working collaboratively with clients, suppliers, partners, regulators, and other interested parties to support sustainable outcomes, environmental improvement, and net-zero ambitions.
- Maintaining appropriate arrangements for environmental awareness, competence, communication, emergency preparedness, and incident response to support effective environmental management.
- Encouraging employee engagement, consultation, and reporting of environmental concerns, incidents, lessons learned, and opportunities for continual improvement.

SPECIFIC FOCUS AREAS FOR DBD

To support the achievement of our environmental objectives, DBD will focus on:

- Reducing the environmental impact of our operations through efficient use of energy, resources, digital technologies, sustainable travel practices, and waste minimisation.
- Applying the principles of the waste hierarchy by preventing waste where possible and maximising opportunities for reduction, reuse, recycling, recovery, and responsible disposal.
- Supporting sustainable procurement and supply chain practices by promoting environmentally responsible purchasing decisions and engaging with suppliers who share our commitment to environmental sustainability.
- Supporting clients and other interested parties in achieving sustainable outcomes through environmentally informed decision-making, carbon reduction initiatives, and the pursuit of net-zero ambitions, whilst maintaining the confidentiality and security of sensitive information.

RESPONSIBILITIES

The Director of HSEQ and Senior Leadership Team are responsible for providing leadership, governance, resources, and strategic direction for environmental management. Team Leaders are responsible for implementing this policy within their areas of control and ensuring that environmental requirements are incorporated into operational activities, projects, and business processes.

All employees, contractors, consultants, and persons working on behalf of DBD are responsible for:

- Complying with this policy and applicable environmental requirements.
- Acting in an environmentally responsible manner.
- Reporting environmental incidents, hazards, non-conformities, and improvement opportunities.
- Supporting the achievement of environmental objectives and continual improvement initiatives.

REVIEW

This policy shall be reviewed annually, or sooner where significant organisational, operational, legislative, regulatory, client, or business changes occur, to ensure its continued suitability, adequacy, effectiveness, and alignment with ISO 14001, DBD's strategic direction, and the expectations of interested parties.

A handwritten signature in black ink, appearing to read 'Thomas Keegan', written over a horizontal line.

Thomas Keegan
CEO, DBD Group

Date: July 2026