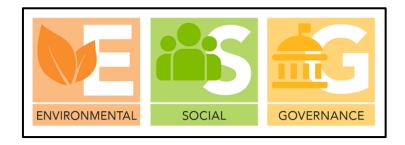


Environmental, Social & Governance (ESG)





M Anderson Construction Ltd Springfield Lodge Colchester Rd Chelmsford Essex CM2 5PW

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1.0 Introduction

M Anderson Construction Ltd (MACL) is one of the UK leading groundworks contractors to the development industry.

Throughout the construction industry, MACL is renowned for its expertise and proven track record in delivering projects on time and on budget. The company has a 400- strong highly skilled, highly valued workforce and run an industry recognised apprenticeship scheme as well as working with schools and colleges to inspire young people to enter the industry.

M Anderson Construction Ltd have a set of core values that are embedded into the company structure which enables Environmental, Social and Governance (ESG) to be delivered seamlessly.

The ESG information within this document demonstrates to clients and other stakeholders the practical measures taken to achieve a high standard of environment, social and governance.

The environmental information includes the company's use of renewable energy sources, waste management, handling of potential air, water and land pollution, and actions regarding climate change.

The social criteria covers an extremely wide range of potential elements such as the company's relationship with employees and stakeholders, investing in building communities, whilst looking at human-related factors such as human rights, child and forced labour, community welfare and stakeholder health and safety.

The governance covers elements such as quality management, IT, board independence, mitigating conflicts of interest, and furthermore looking into our supply chain, systems, and processes.

2.0 Environmental

2.1 Compliance with Environmental Regulations

The Company has demonstrated a commitment to identify all activities that have the potential to cause an environmental impact, as well as providing adequate resources to help minimise or prevent any negative impact. We regularly measure and evaluate our environmental performance and improve where necessary. Further information can be found within the company's Environmental Procedures, and for specific sites, information can be found within the Construction Environmental Plan.

The company recognises all relevant environmental regulations which are detailed within the Legal Compliance Register.

2.2 Green Products

A green product is a sustainable product designed to minimise its environmental impacts during its whole life cycle, and even after it is no longer in use. Green products are identified as having two basic goals- reducing waste and maximising resource efficiency.

MACL recognise the benefits of using green products and work with suppliers to ensure this is implemented across the company.

2.3 Air Emissions

The building and construction sector accounts for 36% of CO2 emissions in the UK. The main emission from site is generated by vehicles and plant and this shall be kept to a minimum by the following control measures:

- Ensure plant and equipment is turned off when not in use.
- Ensure plant and equipment is maintained in accordance with the manufacturer's instructions.
- The selection of fuel-efficient plant and equipment.
- The operation of plant in a controlled manner.
- Ensure static plant is located away from site receptors e.g., occupied areas.

The company shall constantly review the use of new products as technology advances. This may include Hydrotreated Vegetable Oil (HVO) fuel as an alternative to diesel, green hydrogen, the use of electric excavators and hybrid generators.

A number of campaigns have been introduced which include "reducing emissions" which focusses on switching off plant and equipment when not in use and targeting responsible driving techniques.

Dust can create a significant nuisance and can have a detrimental effect on the surrounding vegetation and wildlife. For this reason, the company instigate the following control measures, where applicable:

- The use of a water bowser to dampen down roads.
- Spraying stockpiles
- Employing a road sweeper to clean the roads.
- Where reasonably practicable, sheet contaminated stockpiles
- The installation of dust fencing to create a barrier.
- The avoidance of excavating material during hot weather
- The installation of roads as soon as possible to minimise vehicles running on granular material. The creation of an up-to-date traffic management plan with clear signage, to reduce traffic movements.





2.4 Energy & Water

The company recognise that water is an important resource and should not be wasted. The use of water on site shall be minimised by providing push taps in the basins and fitting spring-loaded pistol grips to hoses. Accidental losses of water shall be prevented by installing the systems with a competent plumber and insulating those pipes that may be affected by the frost. Leaks shall be prevented by protecting the pipework from impact damage and by regularly monitoring the installation.

Suppliers and subcontractors are required to take all reasonable steps to minimise water usage, including:

- Using products with lower embodied water and work with suppliers to create products with lower embodied water.
- Reducing water usage during construction and/or delivery.
- Co-operate and co-ordinate with others including contractors, subcontractors, and consultants, engaged in connection with the works.
- Not discharging or abstracting water without permission, this includes discharging over land.
- The use of designated concrete wash out facilities.

As an organisation we are committed to working with our clients and ensuring sustainable designs are built to the correct specifications to maximise efficiency.

2.5 Hazardous Substances

There are many hazardous substances within the industry and as such the company have instigated several control measures to ensure that employees and others are not harmed. The company shall ensure:

- The avoidance of hazardous substances shall be the first consideration.
- Where it is not possible to avoid a hazardous substance, consideration shall be given to using a substance which is less harmful.
- All substances and processes, used in company offices and on sites, that may be hazardous to health shall be monitored on an ongoing basis. Steps to limit exposure to personnel shall be undertaken to reduce exposure.
- The Management shall select a relevant COSHH assessment and assess the risk, taking into consideration the activity, location, persons involved and the properties of the substance.
- Where appropriate, plant, extraction, and other equipment such as humidifiers and air conditioning equipment shall be checked regularly for microbiological substances that may be hazardous to health.
- Employees using hazardous substances or processes in the course of their work shall handle and store them in the prescribed manner. This is defined as the method(s) deemed necessary to comply with the control procedures laid down in the risk assessment.
- Staff and operatives are not permitted to take hazardous substances onto premises without the prior permission of their manager.





Proper records of all COSHH assessments and other relevant issues are maintained. More information can be found within the Site Health & Safety Folder 3.

Managers, Supervisors, and site Foreman shall ensure that staff and operatives are properly trained to use, handle and store hazardous substances. They shall also be familiar with record keeping requirements and any contingency plan(s) for emergencies. They must also ensure that substance(s) in their area of control are only dealt with in the prescribed manner.

Contractors, sub-contractors, and their staff who are required to use hazardous substances or processes in the carrying out of their work for the Company premises shall comply with these requirements. Details relevant to the COSHH policy will be specified in both contract and purchasing terms and conditions. Contractors' personnel shall not be permitted to take hazardous or dangerous substances onto premises without the prior permission of the Site Management or Health and Safety Department.

2.6 Climate Change

To reduce the carbon footprint of company vehicles, several initiatives have been introduced as follows:

- 1. Selecting economical cars within certain categories and with extended service intervals
- 2. Operating a car and vehicle fleet on a 3-year cycle to keep up to date with efficiency improvements.
- 3. The use of satellite navigation to select the best and shortest route.
- 4. A pro-active maintenance regime.
- 5. A policy dictating driving styles and vehicles checks to reduce in-efficiency.
- 6. The promotion of alternative transport using bike purchasing schemes

To reduce the carbon footprint for plant, the following initiatives have been introduced:

- 1. Selecting fuel efficient plant.
- 2. Compliance with the Non-Road Mobile Machinery Regulations (NRMM).
- 3. Monitoring usage through data recording technology.
- 4. Switching off the engine when not in use.
- 5. Operating on a 3-year cycle to keep up to date with efficiency improvements.



To reduce the carbon footprint for company offices, the following initiatives have been introduced:

- 1. PIR lighting.
- 2. Turning power off when not in use.
- 3. Maintaining equipment in accordance with the manufacturer's instructions
- 4. Hiring/purchasing well insulated site accommodation.



2.7 Natural Hazards

The company recognises that natural hazards can affect our activities and control measures are in place to prevent risk and damage to our properties and sites. These natural hazards are floods, landslides, earth tremors, wildfires, tsunamis, and costal erosion.

We will identify potential flood risk as part of our site selection process. We use the Environment Agency's flood mapping tools and take this into account as part of our planning process. This enables us to put suitable control measures in place to reduce the risk of flooding. We use Sustainable Drainage Systems (SDS) that decrease flow rates to watercourses, increase infiltration to the ground and improve water quality such as ponds, swales, permeable paving, retention basins, wetlands, infiltration trenches and soakaways.

MACL are well equipped to deal with a natural disaster through the Business Continuity Policy/ Disaster Recovery Plan and this is communicated to all employees, stakeholders and interested parties, ensuring the business continues to function.

2.8 Biodiversity

Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. It can be achieved onsite, offsite or through a combination of both. Within the Environment Act 2021 it requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years.

MACL recognises the importance of maintaining biodiversity and as such work with planners and designers to incorporate this into the layout of our clients' developments, creating ecological areas with high biodiversity.

Prior to working on site, the Environmental Report shall be studied to see whether there are any protected species such as badgers, great crested newts, or bats etc. Should there be protected species or other wildlife, a separate assessment shall be undertaken, and relevant control measures adopted such as newt fencing, isolating sensitive areas etc. The Site Management and employees shall remain vigilant with respect to protected species/wildlife and report to the Client/ Principal Contractor in the event of any sightings.



2.9 Soil & Groundwater

Earth movement and groundwater is very prominent in all our works and MACL recognises this can be an energy intensive process and can release carbon. Where reasonably practicable we will improve efficiency and reduce the amount of soil that needs to be excavated, moved, or disposed of by looking at factors such as build sequence and efficiency of design.

Soil and groundwater investigations are undertaken and studied prior to any works on site to discover where the water table lies within the ground and to ensure there are no contaminants in the soil. If contamination is discovered a suitable material management plan and risk assessment shall be undertaken to manage this element.

2.10 Waste/End of Life

The application of the waste hierarchy is fundamental to our approach to waste management, looking to avoid or eliminate the production of waste firstly before reuse, recovery and disposal is considered. Approximately 10m tonnes of construction products are wasted every year at a cost of £1.5billion. These control measures aim to manage site waste more effectively and to reduce potential harm to the environment and human health.

Design teams and suppliers shall be encouraged to optimise material efficiency at the initial planning stage to reduce the amount of waste produced. A site waste management plan shall be produced for all projects.

Circular economy solutions keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

- Where possible, suppliers and subcontractors shall employ closed loop waste systems which utilise the waste product from one process or product in another process or product. This can be part of the same construction project or can be through collaboration with other projects/organisations which use the waste as their raw materials.
- Suppliers and subcontractors should enable the use of "take back" and collection services for their materials and associated packaging for subsequent reuse, recycling, or recovery, where feasible.
- Suppliers, subcontractors and designers shall design, specify, and procure materials, products, and services with the greatest circular-economy benefits.



2.11 Packaging

Packaging contributes significantly to waste production and excessive packaging shall be avoided, where reasonably practicable. MACL will work with its supply chain to encourage minimal packaging or recycled packaging in order to reduce the impact on the environment. Packaging waste materials will be sorted into separate key groups either on site or through a licensed contractor.

3.0 Social

3.1 Consumer Safety

As a company we strive to provide the best quality product to our consumers in a safe and timely manner. In order to ensure client satisfaction and excellence of service on all sites we follow our Quality Management System. We aim to provide a service which is based on the following 3 key principles:

- Focus
- Professionalism
- Efficiency

We provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint. MACL is committed to maintaining a high standard of customer service in line with its corporate objectives.

Client relationships will be approached in a courteous and helpful manner and staff will ensure that our client's issues are understood.

Our aim is to make sure that complaints are, where possible, resolved and the relationships maintained. We strive to improve the service we offer and welcome feedback.

3.2 Community Relations

M Anderson Construction Ltd is committed to investing in communities where it operates and does so in two distinct forms.

Through our in-house charity, The Anderson Foundation where many charities have benefited from previous charity events. We also hold regular fundraising events, including the renowned summer ball, cycle ride and Christmas Luncheon.



MACL have knowledge and experience in the development and management of brownfield sites providing much-needed community regeneration where previously it had been deemed too complicated. Our priority is to bring the community on the development journey for the betterment of all.

Each site is different, and MACL looks to engage with the community where it operates in a way which reflects our core values. We engage with local schools, community groups and stakeholders to provide an insight into the construction industry; be that through careers fairs, presentations, or work placements.

Promotion of the construction industry is key to ensuring longevity and prosperity throughout the country. As a company, MACL are committed to engage with local communities encouraging young people into the industry, enticing people back into the industry whilst ensuring that young people, tutors and parents are aware of the opportunities available.

A variety of events are held throughout the year which include Construction Taster Days, Site Visits, Family Learning Festivals, Mock Interviews, Careers Fairs, Apprentice Evenings and Pop-up Shops. These all help to raise awareness and encourage young people to join the industry. We continue to support the local communities, county, district, and national government where we can, helping to shape the future for an improving industry.



3.3 Health & Safety

MACL recognises the importance of providing safe and environmentally healthy working conditions and practices and fully accepts its legal responsibilities as an employer in meeting duties imposed upon it by Health & Safety Legislation. To demonstrate this commitment the ISO 45001:2018 standard has been achieved year on year.

MACL is committed to ensure that health, safety, and welfare are an integral part of management responsibilities at all levels and on sites. Our objectives are to ensure that the conditions within which our employees work are as safe and as healthy as practicably possible and that members of the public are not harmed by, or through, any of the activities the company may engage in.

Through our Health & Safety Policy, a safe working environment is created where employees feel supported and comfortable in their role. In alignment with the company's core values, and particularly through the values of excellence at all levels, Connection, Belonging & Value, the Directors inspire, support and guide standards of excellence in both their operational business delivery and their people management.

The welfare of employees is paramount and as such, health surveillance is offered to employees together with an employee assistance programme. The company takes mental health seriously and provides a positive working environment where employees feel comfortable, supported, and valued. In addition, a number of mental health first aiders provide support to employees.

MACL are members of "Working Well Together" Group and have been actively involved with the "Safety Health & Awareness Days", providing health and safety advice, on a variety of subjects, to small and medium sized contractors.



3.4 Human Resources

MACL wishes to encourage diversity and eliminate discrimination within the workplace. We aim to continue building a work environment that represents all sections of society and encourages all employees to do their best.

Employees are selected for promotion from within the company wherever possible rather than external recruitment, creating a committed and dynamic management structure from staff who have already demonstrated their abilities and commitment.

A training matrix is reviewed on a regular basis to ensure employees hold the necessary skills, knowledge, and experience to undertake their role successfully. Every quarter we provide around 650 hours' worth of training as well as 35 days of work experience/ school engagements.

The well-being of staff is a true reflection of the company's success at managing social responsibility, as a result, well-being is incorporated into the Health & Safety Policy and is demonstrated by long standing employees with an excellent retention.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country.

We take a zero-tolerance approach to fraud and bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing ad enforcing effective systems to counter bribery and corruption. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operator. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to implementation of effective systems and controls in place to ensure it is not taking place anywhere within the business or supply chain. Our Modern Slavery compliance team help to ensure that our policy is complied with and to manage concerns or breaches. We also have a clear Whistleblowing Procedure which is available to all staff, if there are any genuine concerns about any wrongdoing, these can be raised in confidence and without fear of disciplinary action.

Our Anti-Harassment and Bullying Policy ensures that all employees, officers, consultants, contractors, interns, casual workers and agency workers are treated with dignity and respect and are free from harassment or other forms of bullying in the workplace. The Company has a duty to provide its workers with a safe place and system of work, this includes a workplace free from harassment and bullying which may, in certain circumstances, also amount to unlawful discrimination.

MACL are committed to promoting equal opportunities in employment. Employees and job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

Apprenticeships

MACL opens their apprenticeship scheme each year, seeking 10 recruits aged 16 and over for a 2-year Groundwork Apprenticeship. MACL strives to reignite interest in people, to consider a construction-based career.

The scheme has been very successful with candidates working their way up the ladder and becoming very good Site Managers.

Opportunities are also provided within other departments across the business such as surveying, estimating, engineering and health and safety. An example is a young lady that started age 16, completed an NVQ Level 3 in Civil Engineering and is now a well-respected engineer.



3.5 Innovation

MACL recognises that innovation is key to pushing forward ESG and with new technologies such as electric cars and excavators or biofuels this is making it easier to achieve the Government target of NetZero. We are constantly in talks with suppliers about new technologies that we can trial whilst ensuring it doesn't hinder safety, productivity, and quality.

3.6 Customer Privacy

MACL are committed to protecting the privacy and security of your information. M Anderson Construction Limited are "joint data controllers", this means that we are jointly responsible for deciding how we hold and use personal information. We will comply with data protection law; this says that the personal information we hold must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with these purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only for as long as necessary and for the purposes we have told you about,
- 6. Kept securely.

4.0 Governance

4.1 Supply Chain Management

MACL fully recognises the benefits of working collaboratively with it's supply chain and as such is a member of the Supply Chain Sustainability School. Over the last 30 years the company has established strong relationships with our supply chain, helping the group to add value, enhance quality and ensure that contractors work in a sustainable manner. Contractors are obliged to complete a pre-qualification questionnaire which is vetted by the Health, Safety and Environmental Department which assesses environmental performance, insurance, experience, business type, health & safety, quality, training, and geographic location. Furthermore, continual engagement is established through pre-start and project meetings to establish ongoing control measures in accordance with the businesses' core values.

The sustainable procurement of materials and services is essential to reduce, mitigate and where possible eliminate entirely the environmental and social risk arising from any business operation. To include, but not limited to:

- Depletion of natural resources.
- Environmental impacts caused by raw material extraction and manufacture, such as: air, water or land pollution, energy use and greenhouse gas emissions
- Use of illegally harvested natural materials.
- Destruction or damage of natural habitats.
- Energy used during building occupation.
- Health risks caused by contact with or exposure to harmful materials or emissions during construction and occupation.
- Wastage during construction

SUPPLY CHAIN SUSTAINABILITY

4.2 Information Technology

MACL recognise the benefits of a robust IT system to maintain a high level of employee and operational efficiency. The IT applications streamline communication and collaboration between all stakeholders, enhancing the customer experience and overall visibility of the company.

Cyber security threats challenge all organisations and individuals with new and more sophisticated methods adopted. To combat these ongoing threats, MACL have introduced a granular layer of technologies to reduce the risk of cyber-attacks. These include a Zero Trust approach whereby all applications are blocked from executing, unless whitelisted as safe, via Threatlocker. Webroot antivirus and Web Address checks are deployed to every laptop, desktop and server.

A 24/7/365 managed Secure Operations Centre (SOC) constantly monitors our IT estate for any cyber incidents and will isolate / notifying stakeholders of these before they can cause any harm.

With regards to email based cyber threats, MACL have Mimecast Targeted Threat Protection for all corporate email accounts, a group of services, along with perpetual email archiving, which protect and block emails impersonating individuals, known as CEO fraud.

In addition, email attachments are safely transcribed to .PDF format and links in emails are checked, and the web address rewritten to confirm the web address is safe. To protect physical devices from unauthorised access (laptops and desktops), Microsoft BitLocker encrypts the hard drives, requiring a PIN code to access the device, ensuring that if a device is stolen or lost the information stored cannot be accessed. Similarly, mobile devices (Smartphones and Tablets) are PIN protected and managed via Microsoft Intune. All site locations have endpoint Firewalls which act as gateways to connect our sites and to the Internet, monitor the traffic that passes through them and block unauthorised or malicious access.

Multi Factor Authentication (MFA) or 2 Factor Authentication (2FA) is deployed across our Office 365 suite along with secure access to our internal IT systems for remote access. Additionally, this is also deployed for cloud-based Software as a Service (SaaS) products used within the company to further protect these environments.

Furthermore, MACL are Cyber Essentials and Cyber Essentials Plus certified. Cyber Essentials is an effective, Government backed scheme that protects the organisation, whatever its size, against a whole range of the most common cyber-attacks".

The above measures ensure the highest level of security to maintain compliance with the regulations and business continuity policy.



4.3 Corruption & Business Ethics

MACL has a zero-tolerance approach towards bribery and corruption. MACL prohibits the offering, giving, solicitation or acceptance of any bribe (whether in cash or otherwise) to or from any person or company (including public officials), wherever they are situated, by any individual or group, whether they be employees, agents, or other person or bodies acting on the company's behalf.

A conflict of interest may arise when a person closely connected has relationships with a supplier, customer or any other third-party organisation that may be viewed as impinging or on your impartiality in any matter relevant to your duties. Individuals with responsibility/authority for procuring products or services will be required to formally declare any known or potential conflicts on commencement of employment or appointment to a relevant new role, or prior to any potential conflict arising.

The company makes all personnel aware of the policy and has a tight management structure to ensure strong business ethics are embedded into the structure.

4.4 ESG Systems & Processes

The responsibility for the ESG systems and processes lies with the Board of Directors and policies and standards are set at a board level.

Large companies are mandated to disclose energy and carbon information in the Directors' Report, for financial reporting years starting on or after 1st April 2019. This information is required to be disclosed as set out under the Streamlined Energy and Carbon Reporting Framework.

The energy and carbon information are detailed within the appendix.

4.5 Quality

MACL operate an integrated management system document which is designed to address the business activities and to satisfy the requirements of the Quality Standard : ISO 9001:2015

MACL works alongside its partners and key players in the construction services industry to deliver work of the highest quality.

MACL recognise the benefits to an integrated management system (IMS) which include:

- a) The ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements.
- b) Facilitating opportunities to enhance customer satisfaction.

- c) Addressing risks and opportunities associated with its context and objectives.
- d) The ability to demonstrate conformity to specified management system requirements.
- e) The ability to plan our processes and their interactions by employing the "Plan Do Check Act" (PDCA) cycle and risk-based thinking in our daily operations aimed at taking advantage of opportunities and preventing undesirable results.
- f) Improving the overall Health, Safety and Quality within the company.



Appendix

GHG emissions and energy use data for period April 2022 – April 2023

| | Units | Current reporting year (Apr 22- Apr 23) Location based | Previous reporting year (Apr 21- Apr 22) Location based |
|---|-----------------------|--|---|
| Emissions from combustion of gas (Scope 1) | tCO2e | 4.5 | 6.3 |
| Emissions from combustion of fuel for transport purposes (Scope 1) | tCO2e | 4,706.0 | 5,187.9 |
| Emissions from purchased electricity (Scope 2) | tCO2e | 14.7 | 14.2 |
| Emissions from generation of electricity that is consumed in a transmission and distribution system for which the company does not own or control (Scope 3) | tCO2e | 1.3 | 1.3 |
| Emissions from business travel in rental cars or employee-owned vehicles where company is responsible for purchasing the fuel (Scope 3) | tCO2e | 12.5 | 9.5 |
| Total Gross emissions | tCO2e | 4,739.0 | 5,219.1 |
| Energy consumption used to calculate above emissions | kWh | 19,361,558 | 20,733,479 |
| Intensity Measurement | £ million turnover | £ 67.137 | £ 75.407 |
| Intensity Ratio | tCO2e/£million | 70.59 | 69.21 |

M Anderson Construction Limited consider energy efficiency and reductions in all our operations and activities.

We focus on hiring efficient plant and equipment and to ensure maximum operational efficiency.

We are fully committed to responsible energy usage and energy efficient best practice throughout our operations.