



Environmental Management and Sustainability Policy – EBNI Pty Ltd

Purpose

Engineering Building & Infrastructure Pty Ltd (EBNI) is committed to conducting all construction and engineering operations in an environmentally responsible and sustainable manner. This policy establishes our commitment to environmental protection, sustainability, and compliance with legal obligations. By integrating sustainable practices into our projects, we aim to protect the environment, preserve biodiversity, and contribute positively to the communities we serve. Recognizing that biodiversity has been in decline and stronger action is needed, EBNI is dedicated to being part of the solution through proactive environmental management.

Scope

This policy applies to all EBNI activities, including planning, design, construction, and maintenance of building and infrastructure projects. It covers all employees, contractors, subcontractors, and consultants engaged by EBNI, and extends to all project sites and offices. Everyone involved in EBNI's operations is expected to uphold the commitments outlined in this policy and ensure environmentally sustainable outcomes in their areas of responsibility.

Legislative and Regulatory Framework

EBNI's environmental management approach is guided by relevant Australian environmental legislation and international standards. In particular, we incorporate the principles and obligations of the [Environment Protection Reform Act 2025](#) and related amendments to the Environment Protection and Biodiversity Conservation (EPBC) Act. These recent reforms deliver stronger environmental protection and restoration measures, more robust and efficient project environmental assessments, and greater transparency and accountability in decision-making. Key aspects of the new legislative framework that affect the construction industry include:

- **National Environmental Standards:** The reformed EPBC Act introduces clear standards to protect matters of national environmental significance, providing certainty on impacts deemed “unacceptable” that must be avoided. EBNI will integrate these standards in project planning to ensure our developments do not cause prohibited levels of environmental harm.
- **Independent Environmental Oversight:** The establishment of a new **National Environmental Protection Agency (EPA)** strengthens compliance enforcement and oversight. EBNI commits to full cooperation with environmental regulators and will meet or exceed all compliance

obligations under the law. We acknowledge that penalties for major environmental breaches have increased, and we are dedicated to preventing such breaches through rigorous management and ethical practice.

- **Land Clearing and Biodiversity:** Recent legislative changes remove loopholes and exemptions for high-risk land clearing. EBNI will comply with stricter controls on vegetation clearing and implement best practices in tree and habitat protection on our sites, aligning with the new laws' intent to halt biodiversity loss.
- **Streamlined Sustainable Development Approvals:** Environmental law reforms aim to both better protect nature and **streamline approval processes** for sustainable projects. EBNI supports this dual goal and will ensure our project proposals incorporate strong environmental safeguards from the outset, facilitating smoother regulatory approvals while achieving positive environmental outcomes.

In addition to legal requirements, EBNI's management system aligns with **ISO 14001:2015 Environmental Management Systems** standards. We adhere to ISO 14001 principles by maintaining an environmental policy that includes commitments to fulfill our compliance obligations, prevent pollution, and continually improve our environmental performance. This policy serves as the foundation of our Environmental Management System (EMS) and provides a framework for setting environmental objectives and targets in our operations.

Policy Commitments

EBNI makes the following commitments to environmental management and sustainability, reflecting our corporate values, legal duties, and the expectations of the community:

- **Legal Compliance and Standards:** Ensure full compliance with all applicable environmental laws, regulations, approvals, and permits in every jurisdiction where we operate. We will meet the obligations of the 2025 Australian environmental protection reforms and any other relevant legislation, as well as adhere to the **ISO 14001:2015** requirements. This includes obtaining necessary environmental approvals for projects, conducting thorough environmental impact assessments, and avoiding any impacts identified as unacceptable under national standards. We will maintain up-to-date knowledge of legal requirements and incorporate regulatory changes promptly into our processes.
- **Sustainable Urban Planning and Design:** Integrate sustainability into urban planning for all our development projects. EBNI will promote urban designs that balance the built environment with natural elements to preserve ecological health. This includes appropriate separation and spacing of high-rise buildings to avoid over-concentration, incorporation of low-rise buildings and human-scale developments alongside green open spaces, and protection of natural light and ventilation corridors. We plan projects with green infrastructure principles – integrating parks, trees, green roofs/walls, and natural landscaping – to maintain ecological balance in urban areas.

We encourage mixed-use developments that combine residential, commercial, and recreational spaces **integrated with nature**, improving livability while reducing sprawl. By connecting our developments with green spaces and encouraging walkability and public transport, we help create communities that are both vibrant and environmentally resilient.

- **Biodiversity Protection: Protect and enhance biodiversity** wherever we operate. We commit to assessing and mitigating biodiversity impacts at all stages of our projects. This includes identifying sensitive habitats, flora and fauna early in project planning and implementing measures to avoid or minimize harm. EBNI will not undertake unnecessary clearing of vegetation and will strictly avoid clearing in protected areas or critical habitats for threatened species. Where tree removal or land disturbance is unavoidable, we will obtain relevant permits and offset the impacts through replanting, habitat restoration, or biodiversity offset programs in accordance with regulatory requirements. Our construction plans incorporate **tree management strategies** – for example, pruning or relocating trees where feasible instead of removal, and creating buffers around retained vegetation. We also manage vegetation around power lines responsibly, using methods that reduce risk of outages or fires while preserving tree health and canopy continuity. In line with our obligations and the new EPBC Act amendments, EBNI will contribute to the **protection of native forests and ecosystems**, ensuring our activities do not contribute to deforestation or ecological degradation.
- **Environmental Impact Minimization in Construction: Employ best practices to minimize environmental disruption** during construction. EBNI will utilize innovative and low-impact construction techniques to reduce our footprint. For instance, we commit to using **trenchless excavation methods like micro-tunnelling** for installing underground services (pipes, cables) wherever practicable. Micro-tunnelling avoids extensive open trench digging, significantly reducing surface disturbance, community disruption, and damage to ecosystems. This technique, along with horizontal drilling and other minimal impact methods, helps protect soil structure, tree roots, and local fauna during infrastructure delivery. We will also control construction noise, vibration, and dust emissions to minimize nuisance and pollution. Site Environmental Management Plans (EMPs) will be implemented on all projects, detailing erosion and sediment control, protection of water quality in nearby rivers/oceans, and measures to prevent spills or contamination of soil. By planning construction with the environment in mind, we prevent pollution and maintain the quality of air, water, and land around our sites.
- **Pollution Prevention and Waste Reduction: Prevent pollution at its source and minimize waste generation** in all our activities. EBNI is committed to preventing the release of pollutants into the environment – this includes managing exhaust emissions from machinery (to reduce air pollution and greenhouse gases), preventing any discharge of contaminated water from worksites, and avoiding soil contamination through proper handling of fuels and chemicals. We implement a waste management hierarchy on our projects: reduce waste by efficient design and accurate procurement, **reuse or recycle** materials where possible (such as recycling demolition debris, using recycled aggregates, etc.), and ensure safe disposal of any residual waste. Hazardous wastes are handled and disposed of in strict compliance with regulations to avoid pollution. We set targets to reduce construction and office waste and regularly monitor performance. By

designing for waste reduction and training staff in proper waste segregation, we aim to continually decrease the waste sent to landfill. Our pollution prevention approach also covers noise and light pollution – we schedule work considerately and use technology (like mufflers, low-glare lighting) to reduce these impacts on surrounding communities and wildlife.

- **Resource Efficiency and Climate Change Mitigation: Use resources sustainably and reduce carbon footprint.** EBNI strives for efficient use of energy, water, and materials in our operations. We will optimize designs and construction methodologies to require less raw material and to utilize sustainable or recycled materials when feasible. Water conservation measures (such as rainwater harvesting on sites, using non-potable water for dust suppression) will be implemented to reduce consumption. Energy use on sites and in offices will be managed by using energy-efficient equipment and machinery, and by monitoring fuel and electricity usage. To combat climate change, we are committed to reducing greenhouse gas emissions associated with our projects. This involves gradually **reducing reliance on coal-based energy** sources and **increasing the use of renewable energy** in our operations and facilities. For example, we will purchase or generate renewable electricity (solar, wind) to power our site compounds and corporate offices where possible. We support Australia's clean energy transition and goals such as achieving **82% renewable electricity in the grid by 2030**, and we will align our energy procurement and project designs with these targets. Additionally, EBNI will **explore emerging sustainable energy options, including nuclear energy**, as part of a long-term strategy for reliable, low-carbon power supply. We acknowledge that nuclear energy, while not currently deployed in Australia, could in the future provide a steady source of zero-emission electricity. EBNI will stay informed on developments in advanced nuclear technology (e.g. small modular reactors) and be ready to incorporate such solutions into large-scale infrastructure projects or our own energy mix if they become viable and acceptable. Overall, our approach to energy and resources emphasizes efficiency, innovation, and a shift toward cleaner alternatives to mitigate climate impact.
- **Sustainable Communities and Green Economy: Contribute to sustainable urban communities and the green economy** through our projects. We aim to develop infrastructure and buildings that not only minimize environmental harm but actively improve the sustainability and livability of cities. Our vision includes **mixed-use developments integrated with natural features** – for instance, designing complexes that include housing, workplaces, shops, gyms, and community services interwoven with green parks, urban forests or rooftop gardens. By promoting mixed-use and nature-integrated development, we help reduce the need for long car commutes (cutting emissions), support local economies (shops and services in walkable distance), and provide people with access to nature for recreation and well-being. These design principles foster a green economy by creating demand for sustainable technologies (like green roofs, solar panels, water recycling systems) and green jobs in their installation and maintenance. EBNI commits to working with urban planners, architects, and local authorities to ensure our projects align with sustainable land use plans, maintain **ecological balance** in urban settings, and enhance overall quality of life for residents. We consider factors like avoiding the urban heat island effect (through tree planting and reflective surfaces), ensuring connectivity of green spaces for wildlife

movement, and preserving cultural and natural heritage features in our developments.

- **Continual Improvement: Continuously improve our environmental management** performance. In accordance with ISO 14001, EBNI commits to an ongoing cycle of planning, implementation, review, and improvement of our Environmental Management System. We set measurable environmental objectives and targets (e.g. for waste reduction, emission cuts, incident reductions) and monitor progress against them. We will conduct regular audits and inspections of our sites and processes to ensure compliance and identify opportunities for improvement. Any environmental incidents or near-misses will be investigated, and lessons learned will be used to strengthen controls and prevent recurrence. We also benchmark our performance against industry best practices and seek innovative technologies or methods to improve sustainability. This commitment to continual improvement ensures that our policy remains effective and that we adapt to new environmental challenges, scientific knowledge, and stakeholder expectations over time.

Implementation and Responsibilities

Successful execution of this policy requires clear roles, responsibilities, and the integration of environmental management into all business processes:

- **Leadership and Management:** EBNI's Board and senior management are accountable for endorsing this policy and providing leadership for its implementation. Top management will ensure that environmental considerations are embedded in strategic decision-making and project planning. They are responsible for allocating adequate resources (personnel, budget, and tools) to implement environmental initiatives and for setting the tone that environmental performance is a key organizational priority. Management will also stay informed of changes in legislation and sustainability practices, and update company objectives accordingly.
- **Environmental Management Team:** EBNI maintains a dedicated Environmental Manager (or HSE Manager) and supporting staff who oversee the EMS and drive the implementation of this policy on a day-to-day basis. The Environmental Team is responsible for developing environmental management plans for projects, providing technical advice on impact mitigation (e.g. erosion control, flora/fauna protection, waste management), and monitoring compliance on site. They conduct training sessions, audits, and incident investigations, and report on environmental performance to senior management. This team also liaises with regulators and community stakeholders on environmental matters.
- **Project Managers and Engineers:** Operational managers and project engineers are responsible for integrating the policy commitments into project execution. They must ensure that each project has an approved Environmental Management Plan and that all site activities comply with that plan and regulatory requirements. This includes obtaining necessary environmental permits, implementing control measures (such as sediment fences, tree protection zones, or spill kits on site), and scheduling works to minimize environmental risks. Project teams must consult with the Environmental Management Team during planning and immediately address any

environmental issues that arise during construction (e.g. unexpected fauna discoveries or pollution risks).

- **Employees and Contractors:** All EBNI employees and contractors have a duty to follow the environmental practices and procedures put in place. Environmental protection is a shared responsibility – every individual on site or in the office shall perform their work in line with this policy, take care to prevent incidents, and promptly report any environmental concerns or incidents to management. We require our contractors and subcontractors to comply with EBNI's environmental standards and all legal requirements as a condition of their engagement. This includes proper waste handling, adherence to protected area exclusions, and respectful behavior towards flora and fauna on worksites. EBNI will include environmental protection clauses in contracts and will monitor and audit contractor compliance. Contractors and suppliers are also encouraged to propose sustainable solutions and innovations in their work for EBNI.
- **Design and Procurement Teams:** Our designers (whether in-house or external consultants) are expected to incorporate sustainable design principles (energy efficiency, low-impact materials, passive design, etc.) in project specifications, supporting the commitments in this policy. Procurement staff will consider environmental criteria when purchasing materials and equipment – for example, sourcing materials with recycled content or from sustainable sources (such as FSC-certified timber), and choosing suppliers with strong environmental credentials. We strive to procure locally where feasible to reduce transportation emissions and to support local economies. Additionally, procurement will manage supply chain risks by avoiding materials that are hazardous or sourcing from companies that engage in unsustainable practices.

EBNI will integrate environmental risk management into our overall risk management framework. Prior to commencing projects, we conduct environmental risk assessments to identify potential impacts and develop mitigation measures. Responsibilities for these measures are clearly assigned to ensure accountability.

Communication and Awareness

EBNI recognizes that a culture of environmental awareness and stakeholder involvement is essential to achieving our sustainability objectives. We commit to the following actions to promote understanding and active participation:

- **Employee Education and Training:** We provide regular training to all employees on environmental management and sustainability topics. New employees and contractors receive an environmental induction briefing covering this policy, site-specific environmental rules, and their responsibilities. Ongoing training may include topics such as spill response, waste segregation, heritage awareness, or biodiversity protection techniques. By improving knowledge and competence, we enable our workforce to carry out tasks in an environmentally responsible manner. We also celebrate environmental achievements and share best practices internally to

reinforce positive behavior.

- **Communication and Engagement:** EBNI communicates this Environmental Management and Sustainability Policy to all personnel and makes it available to interested parties (e.g. on our website and on-site notice boards), in line with ISO 14001 requirements. We foster open communication where employees and contractors can raise environmental concerns or suggestions without fear of reprisal. Toolbox talks and regular team meetings on site include discussion of relevant environmental issues to keep awareness high.
- **Stakeholder Involvement:** We involve clients, community members, and other stakeholders in our sustainability efforts. EBNI works closely with clients during project development to incorporate sustainable solutions that meet their needs – for example, advising on energy-efficient options, green building certifications, or community green space integration. We also engage with local communities and councils, especially for large projects, to address environmental concerns and to seek opportunities for community input (such as tree-planting programs or designing public open spaces). When working in areas with sensitive environments or cultural heritage, we consult with Indigenous groups and environmental experts to ensure respectful and informed project delivery. By involving stakeholders, we build partnerships that enhance environmental outcomes and community acceptance of our projects.
- **Client and Supplier Awareness:** We encourage our clients to prioritize sustainability in their project briefs and support them in achieving green building standards or environmental ratings for completed infrastructure. Similarly, we collaborate with suppliers and subcontractors to improve environmental performance across our supply chain, sharing our expectations and helping build capacity (for instance, through joint workshops on sustainable construction materials or waste reduction techniques).

Continuous Improvement and Review

EBNI is dedicated to the continual improvement of our environmental management and sustainability performance. To ensure this policy remains effective and up-to-date, we will:

- **Monitor and Measure:** Establish key performance indicators (KPIs) and monitoring programs to track our environmental performance. This includes monitoring metrics such as energy usage, greenhouse gas emissions, water consumption, waste recycling rates, pollution incidents, and compliance findings. Regular reporting of these metrics will be made to senior management and used to gauge progress against our environmental objectives and targets.
- **Audit and Corrective Action:** Conduct periodic environmental audits and site inspections to verify compliance with this policy, legal requirements, and internal procedures. Any non-conformances or improvement opportunities identified will result in corrective and preventive actions. We maintain a corrective action register and ensure timely close-out of actions to address root causes of issues. Lessons learned from incidents, audits, and stakeholder

feedback are documented and used to refine our practices.

- **Management Review:** Top management will review this Environmental Management and Sustainability Policy, along with the overall EMS, at planned intervals (at least annually). The review will consider performance data, achievement of objectives, changing circumstances (e.g. new laws or technologies), and feedback from employees and stakeholders. Management will assess whether the policy continues to be suitable, adequate, and effective, and will approve necessary revisions to uphold continual improvement. In particular, as new environmental legislation comes into force or new sustainability opportunities arise, EBNI will update its policy commitments and strategies accordingly.
- **Innovation and Leadership:** We encourage innovation in sustainability – whether through adopting new green technologies, improving design approaches, or participating in industry initiatives. EBNI will stay abreast of emerging best practices in sustainable construction (for example, advances in low-carbon materials, biodiversity offsetting methods, circular economy approaches for construction waste, etc.) and seek to pilot or implement those that are relevant to our business. By striving to be a leader in environmental performance, we continuously challenge ourselves to achieve higher standards and contribute to the broader advancement of sustainable practices in the construction industry.
- **Continual Learning:** EBNI promotes a culture of learning from both successes and setbacks. Environmental successes (such as achieving project sustainability targets or awards) will be celebrated and replicated, while any shortcomings will be analyzed for improvement. We also remain open to external input – including stakeholder complaints or suggestions, regulatory guidance, and peer reviews – as valuable sources of information to drive our continuous improvement.

Conclusion

Through this Environmental Management and Sustainability Policy, EBNI commits to responsible stewardship of the environment in all our engineering and construction activities. We understand that protecting the environment, preventing pollution, and promoting sustainable development are not only legal obligations but core responsibilities to current and future generations. By embedding the principles of this policy into our daily operations – from strategic planning down to on-site practices – we will achieve compliance with Australian environmental laws and align with international best practices. Moreover, we will actively contribute to the creation of sustainable, livable communities and a greener economy.

This policy is endorsed by EBNI's leadership and is communicated to all employees and interested parties. It will be reviewed regularly and updated as required to ensure its continued relevance and effectiveness in guiding EBNI towards environmental excellence and sustainability.

Approved by: Managing Director, EBNI Pty Ltd

Date: November 30, 2025