

Environment Management System Manual



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1 Scope

This EMS Manual, in accordance with the ISO 14001 standard, is put in place to support and implement the EMS Policy. This manual specifies the requirements for an environmental management system both at the global and local level that an Arcadis entity can use to enhance its environmental performance. This manual is intended for use by the EMS network to manage its environmental responsibilities in a systematic manner that contributes to Arcadis' sustainability ambition.

The EMS Manual helps Arcadis achieve its sustainability commitments which provide value for the environment, the organization itself and interested parties. Consistent with Arcadis' global sustainability policy, the intended outcomes of an environmental management system include:

- enhancement of environmental performance;
- fulfilment of compliance obligations; and
- achievement of environmental objectives (including e.g., our Net Zero emissions target).

The EMS Manual is applicable to any Arcadis entity, regardless of size, type, and nature, and applies to the environmental aspects of its activities, products and services that the organization determines it can either control or influence considering a life cycle perspective. This manual states specific environmental performance criteria that each Arcadis entity needs to comply with per our EMS Policy to support our Net Zero commitment. It can be used in whole or in part to systematically improve environmental management. Claims of conformity to the ISO 14001 standard and this manual, however, are not acceptable unless all their requirements are incorporated into an organization's environmental management system and fulfilled without exclusion. The manual is implemented for each Arcadis entity at a country level. Methodologies and results are aligned, harmonized, and incorporated into the global system according to one of two options:

- Option 1: The country has an existing operational Environmental Management System (ISO 14001 certified)
 where the EMS Policy, along with this manual, is implemented and incorporated, and all its principles are
 met and integrated.
- Option 2: The EMS Policy along with this manual, are used as the foundation and needed local/ regional builds are added. For example, for countries that are setting up a new system, the global stakeholder analysis will be completed with local stakeholders.

For every Arcadis entity, the EMS Policy and Manual apply to all locations and activities within its organizational boundaries using the operational control approach according to the GHG Protocol (A Corporate Accounting and Reporting Standard, Chapter 3 'Setting organizational boundaries'). This includes providing design, consultancy, engineering, and project management services within our Global Business Areas. To the extent the entity has decision-making authority, contracting third parties, purchasing materials, and managing assets shall be part of the process.

In most cases, the boundaries of the entity are clear, otherwise, an iterative analysis updated annually shall be completed by the EMS manager using the global guidance.

2 Normative References

ISO 14001:2015, Quality Management Systems - Requirements

3 Terms and Definitions

Please see the AIMS ARCADIS Dictionary.

Link to AVA

4 Context of the Organization

4.1 Understanding the Organization and its Context

Arcadis is committed to accelerating a planet positive future. We are connected with a common purpose and mission. We lead the change for our clients and industry, choosing projects deliberately with sustainability in mind for lasting growth. We demonstrate our commitment through the Net Zero targets that we set across our value chain. Relevant external and internal issues that can affect the ability to achieve our targets are captured in:

Arcadis' Annual Integrated Report

The Strategic Context section focuses on challenges associated with global mega trends, feedback from stakeholders, and our competitive landscape.

The Arcadis Risk & Control (ARC) Framework

The Risk Management function enables Arcadians to take responsibility for sustainable growth and profitability, helping the organization deal with changing markets, societal, technological, and regulatory challenges.

4.1.1 Arcadis' Net Zero Targets

Arcadis has publicly committed to becoming <u>net zero across our operations by 2035</u> with the following interim targets which are expected to be addressed in part through implementation of this policy:

- 70% reduction in absolute Scope 1 and 2 (market-based) emissions by 2026 compared to our 2019 baseline
- 45% reduction in absolute Scope 3 emissions by 2029 compared to our 2019 baseline.

Additionally, near term targets supporting our net zero target are:

- 35% reduction in business travel emissions by 2025 compared to our 2019 baseline.
- 50% reduction in air travel emissions by 2025 compared to our 2019 baseline.
- Transition 100% of our vehicle fleet to electric vehicles by 2030.

4.2 Understanding the Needs and Expectations of Interested Parties

The organization shall determine:

- a) the interested parties that are relevant to the environmental management system;
- b) the relevant needs and expectations (i.e., requirements) of these interested parties;

c) which of these needs and expectations become its compliance obligations.

Arcadis is committed to conducting its operations sustainably and acknowledges the importance of engaging stakeholders effectively in sustainability-related dialogues on Environmental, Social and Governance topics such as the EMS. Our <u>stakeholder engagement policy</u> outlines our commitment to structurally engaging stakeholders in accordance with the requirements outlined in the Corporate Sustainability Reporting Directive of the European Union and other relevant guidelines, regulations, and standards such as the Dutch Corporate Governance Code (section 1.1.5) and the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, to create transparency, accountability, and support responsible business practices. The EMS Policy and this Manual follow its requirements to build trust, foster collaboration, and integrate stakeholder perspectives into our decision-making processes and strategy.

5 Leadership

5.1 Leadership and Commitment

The Executive Leadership Team Representative for Sustainability (ELTS) and Country Leadership take accountability for the effectiveness of the EMS Policy and Manual by:

- Ensuring the integration of the EMS requirements into the business processes, e.g., the "Arcadis Way" and therefore communicating the importance of effective environmental management by promoting continuous improvement.
- Ensuring that the human and financial resources needed for the EMS are available following the budget proposal by Global Sustainability and EMS managers.
- Ensuring that the responsibilities and authorities for relevant roles within the EMS Policy and Manual are assigned, established, and communicated internally with support from the EMS manager.
- Directing and supporting employees to contribute to the effectiveness of the EMS.
- Setting / adjusting yearly environmental and sustainability targets and goals based on the sustainability strategy with appropriate performance indicators that are periodically monitored and reported at least bi-annually.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility by defining appropriate sustainability targets.
- Conducting management reviews of the EMS Policy and Manual according to the EMS calendar to ensure that the local EMS achieves its intended outcomes.

The Global Sustainability EMS Lead is responsible for:

- Leading the implementation of the EMS Policy and Manual. This includes developing new guidelines and policies, improving currently existing guidance and embedding continuous improvement.
- Leading the EMS Network, which is composed of more than 25 EMS and Reporting managers across the globe with a dotted reporting line to the EMS Lead and direct reporting line to 20 Country Directors and/or a Global Sustainability Director.
- Organizing trainings and hosting community calls to upskill the EMS and Reporting managers.
- Setting the scene for best practice exchange via designing and facilitating regular meetings and roundtable discussions with different key stakeholders.

- Ensuring each country delivers our global requirements at the local level by creating templates, designing
 acceleration programs, coaching the EMS/Reporting managers and engaging the Country Directors so
 collectively we can meet our Net Zero commitment and environmental objectives as a global company.
- Empowering the EMS network to demonstrate the right behaviors, so Arcadis can be seen as a role model by clients and stakeholders in taking action to align its own business operations with an ambitious Net Zero target.
- Ensuring leadership commitment to the EMS and our sustainability ambition.
- Executing annual management reviews (local and global level) for continuous improvement of the EMS Policy and Manual, reporting to leadership (ELTS and Global Sustainability Directors) on EMS performance.
- Organizing global emission data reported in the NFR platform, together with the Global Sustainability Impact and Assessment Manager and Reporting Managers.
- Acting as a key stakeholder to deliver environmental and emissions input in some of the benchmark programs in which we participate (e.g., CDP, Ecovadis, Sustainalytics).
- Onboarding new members of the EMS network by maintaining an onboarding pack and the EMS Intranet site
 with up-to date materials and guides.
- Aligning implementation of the EMS with the global Quality Management System (QMS).

5.1.1 Environmental Targets

The Executive Leadership Team (ELT) of Arcadis demonstrates leadership and commitment to our Global EMS by setting global Net Zero targets as part of our business strategy. The Country Leadership is committed to achieve these targets by integrating program lines and processes and implementing a roadmap to success. Global Sustainability Team analyzes and communicates the progress against the targets in the Annual Integrated Report (AIR). The results, communicated to the ELTS, Country Leadership and EMS managers and included in the Management Review, are then analyzed against the targets. The necessary budgets for local implementation of EMS initiatives are attributed by the Country Leadership and/or Global Sustainability and guidelines are established when relevant.

5.2 Policies

The Global Sustainability Team developed the Global Sustainability Policy Statement to document our sustainability and environmental ambitions. Global and regional strategies and strategic goals are informed by this policy and resources are made available to reach these ambitions. The team also created the EMS Policy, which is the foundation and basis of the EMS Manual. The policy provides a framework to achieve our net zero targets as a global company by implementing emissions reduction measures, measuring our environmental performance, and demonstrating our organization's sustainability leadership. In the spirit of continuous improvement, these two major policies are annually reviewed by the EMS network and updated as necessary by the Policy Rating & Risk Manager and Global Sustainability EMS Lead, respectively. Where required by local legislation or leadership, additions that only apply to the country are made by the EMS manager.

These policies are approved by the ELT at the global level and Country Leadership for specific local additions. The documents are maintained and always accessible to all employees via the global intranet and accessible for external parties via our website.

6 Planning

6.1 Actions to Address Risks and Opportunities

6.1.1 General

The EMS Policy and this Manual are designed to mitigate environmental risks and explore potential opportunities. Our risks and opportunities are analyzed / established in:

- the context of the organization (Section 4.1)
- expectations of interested parties (Section 4.2)
- environmental and energy aspects (Section 6.1.2)
- compliance obligations (Section 6.1.3)

Arcadis' processes for Double Materiality Analysis and Impact, Risk and Opportunity Analysis

Stakeholder engagement is an essential part of Arcadis' CSRD implementation and is governed by its Stakeholder Engagement Policy on Sustainable Topics. Aligned with CSRD, Arcadis updated its double materiality assessment (DMA) in 2023. Arcadis engaged a diverse array of internal and external stakeholders through a consultation process to arrive at a selection of material themes, which form the foundation for the company's future reporting framework.

Arcadis subsequently refined the results of the double materiality assessment through an impact, risk, and opportunity analysis (IRO) process. This process was performed with the help of subject matter experts on each of the material topics, supported by representatives of the global business areas. It helped to identify actual or potential positive and negative environmental and social impacts from Arcadis' business activities and rate their severity, time frame and what part of the value chain these impacts touch. The process also helped clarify the potential material risks and opportunities posed to Arcadis by each of the underlying European Sustainability Reporting Standards (ESRS), rating their likelihood, time frame, and potential magnitude.

6.1.2 Environmental Aspects Review

Environmental aspects are elements of an organization's activities, products, or services that **interact with the environment**. For example, activities such as energy consumption in the workplace, waste disposal, or projects that influence and may result in changes to environmental receptors such as air and water.

Changes to the environment, either adverse or beneficial, that result from environmental aspects are environmental impacts. These impacts can occur at local, regional, and/or global scale (e.g., climate change), and they can be direct, indirect, or cumulative with other aspects.

In the <u>Environmental Aspects Matrix</u>, the list provided is non-exhaustive and includes what may typically impact our operations, services, and projects in general. Not every aspect is deemed important to each Arcadis entity. This document provides the global baseline for our entities and provides a standard methodology to apply scoring to determine their specific environmental aspects that are important, or "material".

Each Arcadis entity shall determine its respective environmental aspects and their associated environmental impacts based on an approach that was developed the Global Sustainability Team in cooperation with sustainability

and environmental management experts in the GBAs. Established criteria shall be used, and risks and opportunities related to environmental aspects shall be defined as part of this assessment.

Aspects shall be assessed using the recommended methodology in the <u>Environmental Objectives and Management Review Manual</u>. The outcome of this assessment shall lead to priorities for action that are used to establish the environmental objectives and action plan in alignment with global Net Zero targets. All material aspects (red zone) shall be immediately prioritized, and action shall be taken to minimize the impact.

The aspects assessment shall be reviewed at the local level once a year by the EMS manager in cooperation with the Global Sustainability Team. This update to the aspects assessment shall be reported during the management review with the Country leadership and the Global Sustainability EMS Lead.

The global and local enabling functions shall be responsible for providing input data for the environmental aspects assessment as needed. The significant environmental aspects shall be communicated among the various levels and functions of the organization, as appropriate, e.g., on the intranet by the EMS network.

6.1.3 Compliance Obligations

Compliance obligations consist of both mandatory and voluntary requirements related to Arcadis' environmental aspects and impacts. They arise from applicable laws, regulations, and other interested party requirements related to the EMS. These can include, if applicable:

- Global/ Regional legislation
- Local legislation
- Global/ Local Commitment
 - agreements with community groups or non-governmental organizations.
 - agreements with public authorities or customers.
 - voluntary principles or codes of practice.
 - voluntary labelling or environmental commitments.
 - obligations arising under contractual arrangements with the organization.
- Voluntary compliance obligations resulting from Arcadis's commitments to industry policy, best practice guidelines and codes of practice.

Relevant compliance obligations related to Arcadis' environmental aspects and impacts (comprising our own activities e.g., buildings and mobility) shall be identified in the Register of Compliance Obligations. The register shall be updated annually by the EMS network in cooperation with key stakeholders and communicated to the affected management levels (e.g., facility management, finance, legal) by the EMS manager. The affected management levels shall be responsible for implementing the compliance obligations. In case the Global Sustainability EMS Lead makes updates, a notice shall be sent to the EMS network. Compliance obligations in tenders and projects are identified by the project teams and are part of the regular knowledge management processes.

Relevant compliance obligations related to global agreements with community groups, non-governmental organizations, public authorities, customers, voluntary principles, codes of practice, voluntary labelling, environmental commitments, and organizational requirements are embedded in the EMSS through the Environmental Aspects Matrix. When an aspect is marked "material," action shall be required.

The environmental aspect register shall be updated annually at global level by the Global Sustainability EMS Lead and provided to the EMS managers. Once the EMS managers receive the update, they will add local environmental aspects, e.g., in case we have made local (voluntary) agreements or obligations.

Once a year all local compliance obligations shall be reviewed by the Global Sustainability EMS Lead to see if any of the local additions have the potential to be transferred to the global level. This would be the case e.g., if multiple regions or countries have the same additions or the Global Sustainability Team anticipates needing similar type of information on a global scale.

6.1.4 Planning Action

The EMS manager, in cooperation with the Country Leadership, shall be responsible for planning actions to address significant environmental aspects, compliance obligations and identified risks and opportunities using the Environmental Objectives and Management Review Manual. This requires a review of:

- our global net zero targets,
- the local environmental objectives + achievement status
- an annual environmental aspects assessment

The effectiveness of these actions is evaluated through the annual management review using data uploaded to the NFR platform.

6.2 Environmental Objectives and Implementation Planning

6.2.1 Environmental Objectives

The Global Sustainability Team is responsible for setting and communicating the global Net Zero targets.

Based on the established global Net Zero targets, the EMS managers in close cooperation with the Country Leadership shall establish documented local environmental objectives to meet the global targets at all relevant functions, levels, processes, or offices. Meeting the environmental objectives is a shared responsibility among the business areas and enabling functions in the Arcadis entity.

Establishing the objectives shall be performed considering the environmental policy (Section 5.2), the significant environmental aspects (Section 6.1.2), the compliance obligations (Section 6.1.3), and the risks and opportunities from the context and stakeholder analysis (Sections 4.0, 6.0).

The objectives shall be measured against performance indicators (Section 9.0) to ensure progress. The objectives shall be monitored (Section 9.1) and communicated (Section 7.4).

The Country Leadership (local) and ELTS (global) are responsible for the confirmation and approval of objectives and targets.

6.2.2 Planning Actions to Achieve Environmental Objectives

The EMS manager, in close cooperation with the Country Leadership, shall establish an action plan to achieve the environmental objectives. The action plan shall be documented and discussed during the management review,

input data shall be reported bi-annually in the NFR platform, and progress shall be tracked quarterly. Corrective measures shall be identified, documented, and implemented to ensure the set objectives are achieved.

At the minimum, the action plan shall describe:

- What action will be taken to reduce Arcadis' impact in line with the global objectives and targets.
- What resources are required to achieve the objectives and targets (monetary, FTE, knowledge, etc.).
- Who is responsible for what action.
- The timeline of the action to take place, including milestones.
- How progress will be measured, and results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental objectives (Section 9.1).
- The preparation of an annual status report.

7 Support

7.1 Resources

Country Leadership ensures that the financial and personnel resources needed for the establishment, implementation, maintenance, and continual improvement of the EMS are determined and provided. The local EMS manager shall provide an estimate of the necessary resources each year during the annual budget cycle to be proposed to Global Sustainability for approval.

7.2 Competence

Arcadis is a high-skill, innovative company where employees and knowledge are the most vital assets.

The EMS network members shall be trained and have ample knowledge of the expectations within the EMSS to ensure that they can execute their tasks. The needed knowledge and competencies per role are documented in the Knowledge and Competencies Matrix. This matrix shall be updated annually by the Global Sustainability EMS Lead and shall be communicated to relevant parties for recruitment and hiring.

Country Leadership and the Global Sustainability team shall be responsible for ensuring that the EMS network member have the right training and competencies necessary to execute their work through the following processes:

- Recruitment: selection of candidates shall be performed at the global and local level following the hiring process implemented by the People Function.
- Onboarding: new hires shall be assigned an onboarding buddy to help them become familiar with the program
 using an onboarding pack that contains the relevant materials that equip them as they start their role as EMS
 and/or Reporting manager.
- Training: ISO 14001 Implementation trainings shall be made available to EMS network members so they can lead and deliver the EMS effectively for their country.

7.3 Awareness

Regular awareness raising activities shall be organized by the EMS network, in collaboration with Global Sustainability and Marketing and Communications to ensure that Arcadians and relevant external parties are aware of:

- the Global Sustainability Policy Statement and the EMS Policy, and the importance of conformity with the policies;
- their roles, responsibilities and authorities in achieving the requirements of the EMS;
- the significant Environmental Aspects and related actual or potential Environmental Impacts associated with their work;
- their contribution to the effectiveness of the EMS, including the benefits of enhanced Environmental Performance.
- the implications of non-conformity with the EMS requirements, including compliance obligations.

Awareness campaigns are supported by newsletters, emails, intranet information or webinars. Each entity shall introduce the EMS Policy and this Manual as part of their onboarding program for new employees.

Contractors are informed about EMS requirements through the project contract and by the Project Manager, where relevant.

7.4 Communication

7.4.1 General

Arcadis shall communicate internally and externally about the EMS Policy and this Manual at the local level through the EMS managers and globally through the Global Sustainability EMS Lead. Documented information shall be retained as evidence of their communications.

7.4.2 Internal Communication

The local EMS manager shall be responsible for coordinating internal communication through appropriate internal channels. The following tools may be used to communicate internally:

- Email and Teams meeting (regular);
- Intranet and Viva Engage posts (regular updates as needed);
- Webinars (when needed);

The Global Sustainability Team shall be responsible for leveraging local communications to a global platform where needed.

Employees may make comments or suggest improvements to the EMS Policy and this Manual by contacting the local EMS manager via email. The feedback received shall be recorded and processed.

7.4.3 External Communication

Globally there are two topics that will be communicated externally each year through different channels in cooperation with the EMS network:

- Progress against set targets reported in our annual integrated report and posted on our external webpage "Our Carbon Footprint"
- Updated ISO 14001 certificates available on the external Non-Financial Reporting webpage and maintained by the Global Quality team.

External parties can make comments or suggest improvements to the EMS Policy and Manual at by contacting the Global Sustainability Team through sustainability@arcadis.com or the EMS network. The feedback received shall be recorded and processed.

7.5 Documentation

7.5.1 General

The following documents and records (documented information) shall be maintained at a minimum:

- scope of the EMS (Section 1.0)
- environmental policy statement (Section 5.2)
- environmental aspects and impacts, and criteria used to determine significant aspects (Section 6.1.2)
- environmental compliance obligations (Section 6.1.3)
- risks and opportunities, and related planning processes (Section 6.1)
- environmental objectives and action plans (Section 6.2)
- operational control processes (Section 8.1)
- emergency preparation and response (Section 8.2)
- evidence of competence (Section 7.2) and communications (Section 7.4)
- monitoring, measurement, analysis, and evaluation results (Section 9.1)
- compliance evaluation results (Section 9.1.2)
- audit program and results (Section 9.2)
- management review results (Section 9.3)
- non-conformities, actions, and results of any corrective actions (Section 10.2)

7.5.2 Creating and Updating

When creating and updating documents, following minimum information shall be required:

- Title of the document
- Date of creation or update
- Version number
- Page numbers

Additionally, for system documents: author and approver. This shall apply to all document changes related to the EMS.

7.5.3 Control of Documented Information

Documented information as listed in Section 7.5.1 shall be controlled to ensure that it is available for use when needed and that it is adequately protected from loss of confidentiality, improper use, or loss of integrity. Quality management processes shall be put in place to ensure adequate and continuous use.

The control of documented information consists of following activities (as applicable):

- Distribution, access, retrieval, and use.
- Storage and preservation, including preservation of legibility.
- Control of changes (e.g., version control).
- Retention and disposition.

Documented information of external origin determined to be necessary for the planning and operation of the EMS shall be identified as appropriate and controlled.

The EMS Policy and Manual shall comply with the 'EU Charter of Fundamental Rights' which entails the right for protection of personal data.

8 Operation

8.1 Operational Planning and Control

Operating criteria and the control of processes put in place to meet the EMS requirements shall be established to the extent considered necessary. This includes but is not limited to implementing the actions identified in sections 6.1 and 6.2. Documented information shall be maintained to ensure that identified processes are proceeding as planned.

Details for processes which are considered relevant for the EMS are described in the following subsections.

The Arcadis company-wide way of working together, including the processes, are defined on a global level and described in 'The Arcadis Way'.

8.1.1 Office Design and Use

Arcadis has implemented Corporate Real Estate Guidelines that consider energy, water and environmental performance criteria in the selection and design of new or renovated offices, including furniture.

The results of this energy and environmental performance evaluation are incorporated into the selection, specification, design, and procurement activities of relevant project(s) and are recorded by the Local Workplace Manager.

The Global Guidelines provide requirements from the reuse and repurpose of furniture to construction and in use waste management.

The <u>Global Workstyle Framework</u> reinforces our workplace sustainability by supporting a hybrid model that enables more efficient utilization of space.

We have seen significant improvements in the sustainability credentials of the office portfolio through active selection of high performing buildings. We have a significant number of offices designated as BREEAM Excellent or Outstanding, LEED Gold or Nabers 5 and 6 star and Landlords with commitments to their own improvement and action plans showing our commitment to innovative, sustainable real estates.

We work closely with our Procurement Team to source suppliers who can work with us to improve our sustainability goals including procuring furniture and audio visual equipment through global master services agreements.

We also work with suppliers when we relocate, refurbish, or downsize our properties to ensure furniture is reused or donated and recycled as efficiently as possible when disposal is necessary.

We have an annual action plan to improve the operations of our offices, currently focusing on locations in water scare areas and improvements to our waste management and segregation processes, whilst continuing good management practices such as energy monitoring and green energy certificates and the purchase of A rated appliances for water and energy whenever possible.

8.1.2 Procurement of Energy, Products, Equipment, and Services

It is Arcadis' ambition to accelerate a planet positive future in society through the projects we undertake for our clients. This also holds true for our Procurement approach.

Our procurement ambition is guided by:

- The Arcadis General Business Principles (AGBP),
- The Arcadis Global Sustainability Policy Statement,
- The Arcadis Human Rights and Labor Policy,

which further detail Arcadis' integrity, sustainability, and people first core values. This applies to all purchases of goods and services by Arcadis, whether acting on behalf of a client (direct spend), or on its own behalf (indirect spend).

8.1.2.1 Governance

Our Chief Delivery Officer is primarily responsible for our procurement approach, with ultimate accountability with the Chief Executive Officer and our Executive Board.

8.1.2.2 Approach

There are two main areas in the way we operate as a business where we can deliver sustainable procurement results: (1) sustainable supply chains and (2) strategic procurement.

We seek to apply sustainability and innovation related requirements for goods and services we buy.

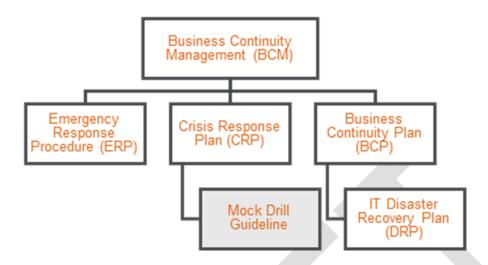
- We expect our suppliers to conduct their operations in an environmentally, socially, and economically responsible way and in compliance with the applicable laws of the countries where they operate.
- We expect our suppliers to provide goods and services that are environmentally, socially, and economically responsible.

- We operate with our Global Supplier Code of Conduct that outlines Arcadis' standards of business principles and sustainability requirements to our suppliers.
- We seek to engage with suppliers that align with our core values People First, Client Success, Integrity,
 Collaboration and Sustainability, and that adopt the same or similar principles for their own suppliers.
- We embrace and stimulate a collaborative approach with suppliers towards innovative and sustainable solutions.
- We will evaluate and monitor the performance of suppliers to trace improvement opportunities and potential non-compliances to our business principles as set out in our Supplier Code of Conduct.
- We will seek a collaborative solution in case of non-compliances to our business principles as set out in our Supplier Code of Conduct.
- We expect our suppliers to prevent, address or remediate these non-compliances and Arcadis will terminate relationships with suppliers with whom we cannot agree on a solution.
- We encourage fair and transparent competition when sourcing goods and services.
- We do not tolerate corruption, bribery, facilitating payments, or fraud in any form.
- We avoid conflicts of interest between personal and professional relationships. This includes financial interests
 in, or control of suppliers, or other commitments to competitors of Arcadis, clients or otherwise. In addition to
 the integrity-related commitments set out in the AGBP, Arcadis Specific Anti-Corruption Standards provide strict
 requirements related to gifts and hospitality and payments to third parties.
- We conduct due diligence on selected suppliers, including (pre-)qualification processes that include sustainability, integrity, human rights, labor conditions, health, safety, and financial stability checks.

8.2 Environmental Emergency Preparedness and Response

Arcadis is committed to Business Continuity Management ("BCM") to be able to continue operations and serve its clients despite interruptions to our business. The BCM Policy defines the scope of business continuity within Arcadis and ensures that the activities in support of that scope are designed, implemented, and maintained in a manner that achieves the stated commitment.

Emergency Response is a critical element of Arcadis' BCM, as depicted below:



Emergency response plans focus on the safety and protection of life and assets. They are concerned with the immediate response procedures in the case of an emergency in an office/operations site. They are local in nature, often per country/site, and enable Arcadis to prepare for and respond to emergency incidents. An Emergency Response Team (ERT) leads the emergency response.

An event that may lead to an emergency can be categorized as follows:

- Location based, where it originates from one or more than one location (e.g., office or site) within a country
- Non-location-based event (e.g., multi-office or country-wide or an event not related to a specific location)

All **location-based** incidents shall be routed through the Emergency Response process which shall ensure immediate operational actions are put in place to deal with it and with the Crisis Response Team (CRT) Lead notified. **Non-location-based** events shall be routed directly to the relevant CRT Lead.

The potential for accident and emergency situations shall be identified in the Hazard Assessment & Risk Control (HARC) and Health and Safety Plans and specific risk assessments. Emergency procedures shall be established to cover suitable response to emergencies, inclusive of but not limited to terrorism, evacuation, fire, injury, illness, media, and environmental incidents.

Every Arcadian shall get inducted on emergency response for the office or site they are assigned too. If an Arcadian visits a new office or site, emergency induction for that site shall be provided upon arrival.

The country H&S director or designee is responsible for ensuring that appropriate emergency arrangements are in place for all office facilities and, as appropriate, project sites including the testing of emergency evacuation procedures and any associated equipment, training and/or communications.

All Arcadis controlled facilities and activities including project sites shall have an appropriate emergency response plan developed. These plans must:

- Indicate the potential emergencies that could arise.
- Provide the means and methods of identifying, preparing for the prevention of the emergency and the potential impacts of the emergency; and,
- Provide a description of the appropriate response actions if an emergency occurs.

The emergency preparedness, evacuation, and response plans, commensurate with the associated risk profile shall include, at a minimum, the following:

- Identification of the possible emergencies that could occur.
- Description of how Arcadis employees, contractors, workers, visitors, emergency response services, government authorities, office building managers and as appropriate, the local community, are notified of emergencies and instructions on what they should do leading up to and during an emergency.
- Emergency support with contact details.
- Support services available to assist with any given emergency (for example International SOS and Control Risks).
- Details regarding staff responsible for these plans.
- Evacuation maps, routing, and other relevant logistics.
- How these plans are communicated; and,
- Appropriate legal requirements.

Development of the plans shall consider the needs and capabilities of interested parties ensuring their involvement in the development of the planned response.

All employees shall be briefed on their duties and responsibilities as detailed in the plan. Relevant information shall also be provided to contractors, visitors, emergency response services etc. as appropriate.

These plans shall be reviewed at least annually or after each emergency in which the plan is implemented, whichever is more frequent, and revised as necessary. Each plan shall be tested periodically, as required

9 Performance Evaluation

9.1 Monitoring, Measurement, Analysis, and Evaluation

9.1.1 General

Performance evaluation entails measuring and evaluating the EMS to ensure its effectiveness, helping every Arcadis entity to continually improve.

The local EMS manager in cooperation with the Facilities and Workplace managers, shall monitor, measure, analyze and evaluate the energy and environmental performance bi-annually using the NFR platform. Appropriate documentation shall be retained and captured in the NFR platform as evidence of the monitoring, measurement, analysis, and evaluation of performance.

The performance monitoring shall include the following key characteristics at a minimum:

- The relevant variables related to significant environmental aspects (Section 6.1.2)
- The actual versus expected energy consumption and emissions
- Appropriate performance indicators for the environmental objectives
- The effectiveness of the action plans in achieving environmental objectives (Section 6.2)

All Arcadis entities will identify their scope 1&2 greenhouse gas emissions and material scope 3 emissions according to the GHG-Protocol. The following emissions are considered material for all Arcadis entities:

SCOPE 1	SCOPE 2	SCOPE 3
Natural Gas	Electricity consumption (from offices and company owned vehicles)	Purchased Goods & Services
Company owned vehicles (fuel)	District heating (and cooling)	Business travel (air travel, private cars, public transportation, hired cars, taxi)
Fuel hired vehicles		Commuter travel (private cars, public transportation, bikes, etc.)
Fugitive emissions (Refrigerants)		Working from home
		Capital goods, treatment of waste generated in operations, upstream transportation (of purchased goods

Besides greenhouse gas emissions, waste, water, and paper consumption (including the share of sustainably sourced paper) shall be monitored.

All the data collectors and validators assigned per Arcadis entity are given access to the NFR platform, and refer to the NFR Reporting Guide. Any changes to access can be requested through the Global Sustainability EMS Lead. Arcadis' non-financial reporting shall be based on the following data:

Monitoring data	Example data sources
Consumption of electrical energy	Data from the energy supplier, information from energy bills, meter data (Workplace function)
Consumption of heating energy (natural gas and district heating)	Data from the heating bills of the landlords, online data from the energy supplier, meter data (Workplace function)
Fuel consumption/ kilometer/ emissions private vehicles for business travel	Reporting managers extract this from Oracle
Fuel consumption/ kilometer/ emissions train and plane travel	Data from our travel agency / (uploaded by the Travel department)
Fuel consumption/ kilometer/ emissions public transport (train, bus, metro, ferry) + taxi	Data from our travel agency / (uploaded by the Travel department)

Fuel consumption/ kilometer/ emissions hired vehicles	Data from our travel agency / (uploaded by the Travel department)
Fuel consumption/ kilometer company cars	Data from the leasing company, internal booking systems (Reporting managers extract this from Oracle)
Fugitive emissions (Refrigerants)	Data from landlords/office managers (Workplace)
Paper consumption	Data from the supplier or office manager for office materials (workplace purchasing department)
Drinking water consumption	Data from the water suppliers, meters and invoices (workplace purchasing department)
Waste	Data from the supplier or office manager for office materials (Workplace Purchasing)
Number of FTE	Data uploaded by People function
Total office area	Data uploaded by Workplace function
Commuting + Work from Home emissions	Data uploaded by Global Sustainability (retrieved by annual survey)

The local EMS managers in collaboration with the Workplace Managers shall ensure that the monitoring of the above performance indicators is executed. Significant deviations in energy and environmental performance shall be investigated by the local EMS managers and the Workplace Managers, and corrective actions shall be implemented as necessary. Results of these activities shall be documented.

9.1.2 Evaluation of Compliance

The EMS Network shall periodically evaluate compliance with legal and other obligations (Section 6.1.3), using the following tools:

- the list of compliance obligations (Section 6.1.3)
- inspections / checklist used for routine checks
- internal audits/self-assessments (Section 9.2) identifying and complying with legal requirements
- management reviews (Section 9.3)
- continuous or periodic measuring program(s) and reporting results
- incident monitoring
- workplace inspections

If compliance evaluation results indicate a failure to fulfil a legal requirement, the organization shall determine, implement, and document the actions necessary to achieve compliance.

9.2 Internal Audit and Self-Assessment

9.2.1 General

Internal audits shall be conducted at least annually to provide information on whether the EMS conforms to the requirements of ISO 14001. These internal audits shall be used to verify if the EMS Policy and this Manual are effectively implemented, maintained, and our environmental performance improved.

From a practical point of view, internal audits of the EMS may be combined with other internal audits, e.g., quality or H&S management systems audits. For Arcadis entities that are not ISO 14001 certified, a <u>self-assessment program</u> is conducted annually to check conformance to the EMS Policy and Manual.

9.2.2 Internal Audit Program

The internal audit program, including the frequency, methods, responsibilities, planning requirements and reporting, shall be developed, implemented, and maintained by the local EMS managers. For Arcadis entities that are ISO 14001 certified, internal audits shall be planned and scheduled by the Quality, Health and Safety, Environment (QHSE) Department as part of the Integrated Management System, ensuring that each entity/activity/process is visited at least once every 12 months. For entities that are not certified, an annual self-assessment shall be conducted.

The duration of internal audits may vary according to the size of the office, the type of activities and/or the level of risk identified.

Internal audits may be carried out at the request of a Director/Manager/Project Manager or a Process Manager, in the case of a customer requirement, an identified deviation, etc., or to improve the efficiency and performance of the activity to be audited.

System audits shall be carried out by a team of QHSE internal auditors. The audit managers shall be trained in the requirements of ISO standards and qualified to carry out internal audits and/or are competent in the field of activity being audited to check that the required obligations are being applied.

The team of auditors may be accompanied by an expert in the activity being audited. The auditor is responsible for conducting the audit, drawing up a formal report notifying any deviations detected, and proposing areas for improvement. The actions identified shall be followed up by the audit team with the people concerned.

During the audit, the auditor may offer to carry out an educational action to help, support or remind employees of the requirements of the management system. This pedagogical action encourages exchanges on the provision of tools/procedures/models and provides feedback as part of the continuous improvement process.

The results of the audits and self -assessments shall be recorded and reported to the Country Leadership and Global Sustainability EMS Lead. The results of all the audits are combined by the Global Sustainability EMS Lead and reported to the ELTS through the annual management review.

9.3 Management Review

9.3.1 General

Arcadis Senior Leadership shall annually review the EMS Policy and Manual on two levels to ensure its continuing suitability, adequacy, and effectiveness:

- Country Leadership shall review the EMS Policy and Manual at least annually together with the local EMS manager. The review shall be prepared by the local EMS manager and documented in a management review report which is forwarded to the Global Sustainability EMS Lead.
- The ELTS shall review a combination of all management review reports annually reported to and prepared by the Global Sustainability EMS Lead. If needed, any feedback shall be shared with the Local EMS Manager and Country Leadership.

To ensure that all input of each Arcadis entity is available to be reviewed by the ELTS, an EMS calendar shall be maintained defining the EMS timelines.

9.3.2 Management Review Inputs

The following information shall be included as input to the management review by the local EMS manager:

- the status of actions from previous management reviews
- the extent to which objectives have been achieved
- review of the local environmental policy against the Global Sustainability Policy Statement and EMS Policy (Section 5.2)
- adequacy of resources (Section 7.1)
- relevant communication(s) from interested parties, including complaints (Section 7.4)
- changes in:
 - external and internal issues that are relevant to the EMS (Section 4.1)
 - the needs and expectations of interested parties (Section 4.2)
 - risks and opportunities (Section 6.1)
 - its significant environmental aspects (Section 6.1.2)
 - compliance obligations (Section 6.1.3)
 - results of the evaluation of compliance (Section 9.1.2)
- information on environmental performance, including trends in:
 - environmental performance indicators (Section 9.1)
 - monitoring and measurement results (Section 9.1)
 - fulfillment of its compliance obligations (Section 9.1.2)
 - audit results (Section 9.2)
 - nonconformities and corrective / preventive actions (Section 10.2)
- opportunities for continuous improvement (Section 10.3) and projected environmental performance for the following period

9.3.3 Management Review Outputs

The outputs of the management review shall include:

- conclusions on the continuing suitability, adequacy and effectiveness of the EMS
- decisions related to continual improvement opportunities
- decisions related to any need for changes to the EMS, including resources, policies, and objectives
- · actions, if needed, when objectives have not been achieved
- opportunities to improve integration of the EMS with other business processes, if needed
- any implications for the strategic direction of the company.

10 Improvement

10.1 General

Opportunities for improvement shall be identified, and necessary actions to achieve the intended outcomes of the EMS Policy and Manual shall be implemented. An annual leadership report at the beginning of each year conducted by the EMS Managers with their Country Leadership and reported to the Global Sustainability EMS Lead shall help monitor outputs from the management review.

10.2 Non-Conformity and Corrective Action

When a nonconformity occurs, action shall be taken to control and correct it, and to deal with the consequences, including mitigating adverse environmental impacts. The need for action shall be evaluated to eliminate the causes of the nonconformity, so that it does not reoccur or occur elsewhere. This shall be done by determining the causes of the nonconformity and determining if similar nonconformities exist or could potentially occur.

Corrective actions shall be appropriate to the significance of the effects of the nonconformities encountered, including the energy and environmental impacts. The effectiveness of corrective action shall be reviewed.

Documentation shall be retained as evidence of the nature of the nonconformities and any subsequent actions taken, and the results of any corrective action. To log and register all the nonconformities, a logbook shall be used which is updated every time a nonconformity occurs. All nonconformities shall be reported to the management in the annual management review. The corrective action procedure of the quality management system shall be applied analogously.

Corrective actions shall be documented in the corrective action plan that is maintained by the local EMS manager. The Country Leadership shall ensure success of the corrective actions.

10.3 Continual Improvement

Arcadis Leadership on all levels is committed to continually improve the suitability, adequacy, and effectiveness of the EMS to enhance Arcadis' environmental performance, following the Plan-Do-Check-Act (PDCA) methodology.