



## CASE 4

## Construction: Housing construction company

SMALL UNDERTAKING (12 employees)	MEDIUM UNDERTAKING (200 employees)*
<p><i>CONTEXT, illustrative, not to be disclosed under C2</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Small residential construction contractor, focusing on operational efficiency and safety</li> <li><input type="checkbox"/> Considers clean operations and the use of low-emitting machinery as good practice</li> </ul>	<p><i>CONTEXT, illustrative, not to be disclosed under C2</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Contractor for larger residential housing projects, requiring it to streamline operational processes</li> <li><input type="checkbox"/> Focus on reducing the amounts of energy, water and materials used as part of their mission</li> </ul>
<p><i>The undertaking discloses that it has practices, policies or future initiatives for the following issues (B2):</i></p>	
<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Pollution</li> <li>• Own workforce</li> <li>• Affected communities</li> <li>• Business conduct</li> </ul>	<ul style="list-style-type: none"> <li>• Climate Change</li> <li>• Pollution</li> <li>• Circular Economy</li> <li>• Own Workforce</li> <li>• Workers in the value chain</li> <li>• Affected Communities</li> <li>• Business Conduct</li> </ul>
<p>We consider the environment and the community where we work (Climate change, circular economy, pollution):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We avoid extended use of diesel generators and request temporary power grid connections</li> <li><input type="checkbox"/> We use battery-powered tooling where possible to minimise fossil fuel use and reduce worksite noise</li> <li><input type="checkbox"/> We clean our sites daily to avoid soil or water pollution incidents and to ensure all materials and waste are stored safely</li> <li><input type="checkbox"/> All employees are trained to identify and separate waste streams, and dispose of hazardous waste correctly</li> </ul> <p>In addition to applying health and safety regulation (Own workforce):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We conduct employee training for heat stress risks, on extreme weather events, and emergency/first aid response</li> <li><input type="checkbox"/> Use of Personal Protective Equipment (PPE)</li> <li><input type="checkbox"/> Machinery instructions are available in multi-language format</li> <li><input type="checkbox"/> Site managers are responsible for conducting regular risk assessments to identify potential hazards on the construction site and document them by type and by location</li> <li><input type="checkbox"/> We engage with our employees to evaluate risks based on their experience</li> <li><input type="checkbox"/> Display clear and visible safety signs around the construction site to warn of hazards.</li> </ul>	<p>We consider the environment and the community where we work (Climate change, circular economy, pollution):</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> By avoiding extended use of diesel generators and request temporary power grid connections and use battery-powered tooling where possible to minimise fossil fuel use and reduce worksite noise</li> <li><input checked="" type="checkbox"/> By reducing the material intensity of our operations, as we demand engagement with architects and designers during the design phase to streamline material selection and design optimization</li> <li><input checked="" type="checkbox"/> By improving our recovery and recycling rates, thanks to the implementation of on-site waste separation</li> <li><input checked="" type="checkbox"/> By successfully piloting the collection of specific demolition waste streams to repurpose for reuse</li> <li><input checked="" type="checkbox"/> By aiming to apply our waste stream repurposing activities to all projects by the end of 2026</li> <li><input checked="" type="checkbox"/> By encouraging the use of certified materials in our negotiations with architects and clients, preferably from regionally sourced origins</li> </ul> <p>In addition to applying health and safety regulation (Own workforce, affected communities):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We conduct employee training for heat stress risks, on extreme weather events, and emergency/ first aid response</li> <li><input type="checkbox"/> Use of Personal Protective Equipment (PPE)</li> <li><input type="checkbox"/> Machinery instructions are made available in multi-language format</li> <li><input type="checkbox"/> Site managers are responsible for conducting regular risk assessments to identify potential hazards on the construction site and document them by type and by location</li> <li><input type="checkbox"/> We engage with our employees to evaluate risks based on their experience</li> <li><input type="checkbox"/> We display clear and visible safety signs around the construction site to warn of hazards.</li> <li><input type="checkbox"/> Our site managers are trained to engage with neighbours in case of complaints.</li> <li><input type="checkbox"/> All employees are trained to identify and separate waste streams, and dispose of hazardous waste correctly</li> </ul>

\* This case study builds upon the practices, policies, and future initiatives outlined in the case study of the small undertaking. Any additional practices, policies, or initiatives not included in the small undertaking are highlighted in blue.

## SMALL UNDERTAKING (12 employees)

## MEDIUM UNDERTAKING (200 employees)\*

### Onboarding/training and building experience (Own workforce, affected communities):

- We will start a training programme on good construction practices
- Our site managers are trained to engage with neighbours in case of complaints

### We work with integrity and transparency (Business conduct):

- We do not tolerate that our employees are involved in undeclared or inappropriate works, such as the provision of services to third parties during their work time, as this could expose the company to legal or ethical risks
- We do not offer any gifts to public officials, be it monetary, products or labour
- Permit delays or work disruptions shall be reported in a timely and transparent manner

To ensure safe operations and working conditions, we developed an Employee Handbook, which sets rules on (Own workforce, workers in the value chain):

- Safe work environment, available in the languages of the workforce on, amongst others, protection gear and working at height rules, handling of machines, and extreme weather measures.
- Non-discrimination policy
- Remuneration and promotion structures, like fair and timely payment of wages and clear rules on working hours
- Working hours and breaks
- Employee training and participation in apprentice schemes
- All suppliers providing on-site activities are required to sign and apply our Employee Handbook rules to their workers. For parties unwilling to sign, additional controls are enacted.

### We work with integrity and transparency (Business conduct):

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- We do not offer any gifts to public officials, be it monetary, products or labour
- Permit delays or work disruptions shall be reported in a timely and transparent manner

Our workers encounter many different stakeholders and interested parties, we therefore apply a business conduct policy that addresses both conflicts of interest and corruption (Business conduct):

- We expect leadership and employees to avoid situations where personal interests, external activities, financial interests, or relationships conflict (or risk conflicting) with the company's interests
- Employees who believe they may face a conflict of interest must inform their manager or HR so the company can assess and address it
- A whistle-blowing hotline is available in relevant languages to report concerns such as bribery, undeclared work, or permit fraud
- From 2025, employees will be briefed before major projects to help them recognize and handle conflicts of interest and understand the negative impacts of policy breaches

### Description of target related to a policy (B2):

The small undertaking discloses under B2 that it does not have targets:

NO DISCLOSURE

The medium undertaking discloses under B2 that it has targets:

Employee training for all employees on conflict of interest by end-2026.

To expand our waste stream repurposing to all projects by the end of 2026, we plan a one-time investment in sorting and cleaning machinery. A € 150,000 investment has been allocated, partially government supported.

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