
Biodiversity Policy

February 2026

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v0.1	June 2023	Draft policy	HSEQF Director	The Board	POL-044
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v1.2	February 2026	Policy Updated and Reviewed	E&S Director	The Board	POL-044

Biodiversity Policy

Clancy Group Holdings Limited and its subsidiaries (Clancy or we) have set out in this policy the steps that we intend to take to act in an environmentally conscious manner and to continuously improve our operational environmental performance.

We recognise the importance of halting and reversing biodiversity loss and are committed to supporting relevant national strategies that seek not only to maintain, but to enhance biodiversity. This policy provides the framework through which we will identify, manage and mitigate our biodiversity-related impacts and dependencies, and integrate biodiversity considerations into our decision-making and Environmental Management System. Through this approach, we aim to responsibly deliver on our commitments and contribute to improved environmental outcomes.

Policy

The government recognises the essential role that biodiversity plays and is committed to helping support biodiversity enhancement which will be achieved through the publication of the 25 Year Environmental Plan and the Environmental Improvement Plan 2023. This policy recognises those commitments and targets set by the government and its adoption will underpin our approach to identifying habitat degradation and opportunities for environmental improvement.

In addition, this policy sets out our approach to delivering more resilient and biodiverse habitats not only across our estate and our existing projects, but also in working closely with our clients, active partners, communities, as well as key stakeholders to maintain enhance and identify opportunities to increase biodiverse habitats.

This policy is periodically reviewed by the Environment and Sustainability Director and will be monitored for compliance by Line Managers/Supervisors within their own area of responsibility. Any questions about the day-to-day application of this policy should be referred to the Environment and Sustainability Director. This policy does not form part of any contract of employment, and we may amend it at any time.

What is biodiversity?

Biodiversity encompasses the variety of ecosystems, species and natural processes that underpin environmental stability and resilience. It is fundamental to the provision of ecosystem services that support human health, economic activity and long-term organisational sustainability. However, ongoing biodiversity loss represents a significant environmental risk and a growing global challenge.

The degradation of oceans, forests and other ecosystems reduces nature's capacity to deliver essential goods and services and can increase environmental, operational and reputational risk. We therefore recognise the importance of identifying, assessing and addressing our impacts and dependencies on biodiversity as part of our Environmental Management System. By doing so, we seek to support the protection of the environment, contribute to sustainable outcomes, and enhance long-term value for our stakeholders through continual improvement in environmental performance.

Objectives

We will:

- comply with all applicable environmental legislation and drive for more sustainable solutions where we operate;
- review and monitor annually recorded habitats and species on Clancy owned sites and on

projects;

- identify and implement specialist protective measures for vulnerable species on Clancy owned sites and on projects;
- identify new opportunities to conserve and create new biodiversity habitats;
- review and identify management techniques to minimise the use of pesticides on Clancy owned sites;
- incorporate the principles of biodiversity into estate planning and project management in line with the Town and Country Planning Act 1990, 10% biodiversity net gain requirement;
- work with new and existing partners to sustain and enhance biodiversity on Clancy owned sites as well as projects, and where possible within the local area;
- build on our links with the community through ecology interest groups, local authorities, and charities;
- insofar as is practicable, preserve and enhance existing valuable habitats on Clancy owned sites and on current and existing projects in accordance with the mitigation hierarchy**; and
- increase interest and awareness of biodiversity issues using interpretation/information panels at strategic points throughout clancy owned sites and projects including areas adjacent to ponds and woodlands.

** the mitigation hierarchy is a widely used framework that emphasises best-practice of avoiding and minimising any negative impacts on biodiversity from development projects, and then restoring sites no longer used by a project, before finally considering offsetting residual impact.

Engagement

As part of our commitment to supporting biodiversity and recognising the importance of engagement, we will liaise and engage with local communities and wildlife organisations as part of our wider social and community vision and aspirations.

We believe that it is essential to engage our stakeholders, partners, and staff, as well as local communities so that they can understand the importance of biodiversity and how they can make a tangible difference to their local environment.

Engagement consists of education, training and practical projects that demonstrate positive value to biodiversity and embed learning and skills which will positively change lives and improve our understanding of nature by:

- establishing locally led wildlife projects that focus on people and nature, which will support both communities and declining species;
- increasing wider opportunities for our staff to volunteer and improve both quality of lives and environments on our estate and in the vicinity of our projects where possible; and
- raising awareness of good practice and personal achievements, which will incentivise positive action for change to our biodiversity rich landscape.

In practice we will:

- work with our clients and through our bids to integrate and increase biodiversity opportunities;
- ensure that our operational practices ensure environmental and biodiversity protection and identify opportunities for enhancement;
- review and challenge existing working practices to identify greater ways of working that positively

support biodiversity;

- increase knowledge through use of Toolbox Talks and internal Greencard training with the wider operations and delivery teams;
- undertake the correct assessments before commencing works and put in place the right protective measures;
- ensure that we are assessing all biodiversity-related risks (including for unplanned works) and proactively managing such risks whilst working. In woodlands dead timber will be left standing to act as a habitat for vulnerable species such as bats, owls, and woodpeckers where safe to do so;
- make safe fallen timber and leave in situ where safe to do so;
- ensure that estate operations such as grass cutting and tree/bush pruning are timed carefully to reduce the impact on breeding, feeding and hibernating species;
- communicate and educate our employees on the importance of biodiversity, enhancement and protection via training resources, procedures and toolbox talks as appropriate;
- work with schools across the region to assist with biodiversity education and where possible, implement nature programmes;
- review and where possible, implement low impact methods of pest and weed control;
- seek to measure and record biodiversity on both Clancy owned sites and projects (where feasible and possible to do so) by using industry standards such as biodiversity impact assessments and the biodiversity net gain calculation tool; and
- review and update this policy annually.