

## 1. Purpose

Apollo Property Group is committed to managing its operations in an environmentally responsible manner, to prevent, minimise and, where possible, avoid adverse environmental impacts and to protect and enhance environmental values.

This policy establishes the governance framework for environmental management across Apollo's operations and supports compliance with legal, regulatory, client and certification requirements.

This Policy forms part of Apollo's Integrated Management System (IMS) and aligns with ISO 14001 Environmental Management Systems and Office of the Federal Safety Commissioner (OFSC) expectations.

## 2. Scope

This Policy is approved by the Board of Apollo Property Group Pty Ltd and applies to all Apollo Property Group personnel, including employees, contractors, directors, subcontractors, labour hire, offshore resources, temporary personnel and any other parties who may be involved in or affected by Apollo's activities.

Apollo Group Services Pty Ltd (AGS), as the employing entity, adopts and is bound by the governance and compliance framework of Apollo Property Group.

This Policy applies to all Apollo workplaces and activities, including offices, construction and project sites, and client-controlled environments where Apollo has management or influence.

## 3. Policy Statement

Apollo Property Group is committed to conducting its operations in compliance with applicable environmental legislation, regulations, licence conditions and contractual obligations, and to integrating environmental considerations into business planning, project delivery and operational decision making.

Apollo recognises that effective environmental management relies on leadership, consultation, risk-based decision making and continual improvement. Environmental responsibilities are shared across the organisation and extend to suppliers, contractors and other parties engaged in Apollo's activities.

## 4. Environmental Management Framework

Apollo will implement, maintain and continuously improve an Environmental Management System (EMS) that includes:

- Identification, assessment and management of environmental aspects, impacts and risks associated with Apollo's operations.
- Compliance with applicable environmental legislation, regulations, approvals, licenses and permit conditions.
- Implementation of controls to prevent, minimise or manage environmental harm.
- Integration of environmental requirements into project planning, procurement and delivery activities.
- Communication and consultation with workers, contractors, suppliers, clients and relevant stakeholders on environmental matters.
- Training and awareness to support environmentally responsible work practices.
- Monitoring and measurement of environmental performance and compliance.

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- Management of environmental incidents, non-conformances and corrective actions.
- Planned reviews, inspections and audits of environmental systems and controls.
- Document control processes to ensure environmental information remains current and accessible.

**5. Supply Chain, Contractors and Stakeholders**

Apollo will engage with suppliers, contractors and subcontractors to communicate environmental obligations and expectations relevant to their work. This includes promoting compliance with environmental requirements, sharing relevant information, and encouraging environmentally responsible practices throughout the supply chain.

Apollo will also engage with clients and other stakeholders regarding environmental risks, requirements and opportunities to improve environmental outcomes where relevant.

**6. Sustainability and Resource Management**

Apollo encourages the adoption of sustainable and innovative practices where appropriate to support the efficient use of resources, waste reduction, reuse and recycling. Where relevant to projects, Apollo will support environmental certification initiatives, such as Green Building Council of Australia Green Star ratings, in accordance with client and project requirements.

**7. Governance, Roles and Responsibilities**

**Board of Directors**

The Board has ultimate accountability for environmental governance and oversight, including ensuring appropriate systems and resources are in place to manage environmental risks.

**Officers**

Officers exercise due diligence in accordance with applicable legislation by ensuring environmental risks are identified, managed and monitored, and that the Environmental Management System is effectively implemented.

**HSEQ Manager**

The HSEQ Manager is responsible for coordinating and overseeing the implementation and ongoing operation of Apollo’s Environmental Management System, including providing specialist advice, supporting the identification and management of environmental risks, monitoring environmental performance, supporting consultation and reporting processes, and driving continuous improvement initiatives.

**Management**

Managers and Supervisors are responsible for implementing environmental requirements within their areas of control, integrating environmental considerations into planning and delivery, and supporting compliance and reporting.

**Workers and Other Persons**

All workers and other persons engaged in Apollo’s activities are expected to comply with this Policy and associated procedures, follow reasonable instructions, and report environmental hazards, incidents or concerns.

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**8. Objectives, Monitoring and Continuous Improvement**

Apollo will maintain environmental objectives and performance measures aligned with its activities and risks. Performance is monitored through inspections, audits, incident reporting, management review processes and project-level environmental management plans.

Apollo is committed to continual improvement of environmental performance through the review of outcomes, corrective actions, lessons learned and changes in legal, regulatory, client or organisational requirements.

This Policy and the Environmental Management System will be reviewed at least annually, or sooner if required due to changes in legislation, organisational structure, operations or environmental risk profile.

Authorised by



Leon Bowes  
CEO & Chairman

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