

SUSTAINABLE PROCUREMENT POLICY

December 2022

Willmott Dixon Holdings

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1.0. INTRODUCTION

Willmott Dixon is a privately-owned contracting and interior fit-out group dedicated to delivering brilliant buildings, transforming lives, strengthening communities and enhancing the environment so our world is fit for future generations. Our Now or Never Strategy sets out how we will do this and recognises the important part our supply chain partners have to play in achieving our ambitions.

Working collaboratively to solve shared problems is key to our future success. We want our partners to be a reflection of our business, sharing our values and helping us to deliver our goals. This collective effort will enable us to succeed as one team even in the most demanding of situations. Delivering our sector-leading ambitions will call on our partners' skill and expertise, their innovation and inspiration as well as their commitment that it is the right thing to do.

By working together to consider what we are buying, its impact and how it will be used, we will find new opportunities to better support our customers and also help our partners become more resilient and more prosperous.

This policy sets out what we expect of both our supply chain partners and our people to ensure our procurement practices are sustainable, innovative, and industry leading.

2.0. SCOPE

This policy applies to all procurement activity carried out by Willmott Dixon Holdings, including Willmott Dixon Construction and Willmott Dixon Interiors. It also applies to those purchasing activities carried out on our behalf or by our supply chain partners; this includes designers, consultants, specifiers, trade contractors, product manufacturers and product distributors.

Our supply chain partners can be classed as:

- **Goods Partners** – those manufacturers and distributors we purchase materials and products from, either directly or on our behalf.
- **Works Partners** – those labour and trade suppliers whom we contract to work on our projects. These partners may also supply goods, or provide other services such as site security or waste management, etc.
- **Design and Consultancy Partners** – those professional skills and expertise we procure, such as design consultancy, architects, etc.

The expectations that we place onto our supply chain partners differ depending upon whether a partner is a Strategic Partner, or whether they are classed as Category A+, A or B/C. Requirements that apply only to specific categories are made clear in each section of the policy.

Requirements within this policy are set out as follows:

- **Mandatory** – Must be complied with by all relevant parties.

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- **Mandatory in Development** – must be complied with by all parties by the date given
- **Preference** – We will procure with a preference for these requirements where all other aspects of delivery are equal.

3.0. USING THIS POLICY

This policy is subdivided into several sections. Not all sections will be relevant to all partners. This section acts as a navigation tool to direct our partners to the sections of the policy most relevant to them.

All supply chain partners should refer to section 4.1.

Goods supply chain partners should also refer to section 4.3 if they supply any of the following materials/products:

- Concrete and/or cement
- Drylining and/or partitioning
- Finishes and/or sealants
- Insulation
- Natural stone
- Plant & Equipment
- Polyvinyl chloride (PVC)
- Steel and/or aluminium
- Timber/timber products

In addition to the above, **Strategic Goods supply chain partners** should refer to section 4.2.

All Works supply chain partners¹ should refer to sections 4.1 and 5.1. They should also refer to section 4.3 (if they supply any of the products listed above).

Specific works trades are also listed as part of section 5.0; partners that are **groundworkers** (section 5.2), **drylining/partitioning & M&E** (section 5.3), and **waste and demolition** (section 5.4) all also have their own section to refer to. **Agency labour and site security works partners** need only comply with section 5.5.

Design & consultancy supply chain partners should refer to section 6.0.

This policy is also relevant to **purchasing activity that is only relevant to Willmott Dixon**; specific activities and relevant requirements are listed within section 7.0.

¹ With the exception of agency labour and site security partners.

4.0. ALL SUPPLY CHAIN PARTNERS

4.1. ALL SUPPLY CHAIN PARTNERS

Below is a summary of the requirements for all Willmott Dixon's supply chain partners. Unless otherwise stated, requirements apply to all partners.

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
To have a full & relevant Environmental Policy to demonstrate they are undertaking initiatives to promote greater environmental responsibility & development of environmental products in line with the environmental principles of the UN Global Compact Principles ² .	X		
To provide technical and transparent evidence to support any performance related product claims when requested by Willmott Dixon.	X		
To ensure collaboration with Willmott Dixon through sharing best practice, new products & innovation.	X		
To comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy.	X		
To ensure that all materials and substances used comply with relevant UK legislation.	X		
Upon request all partners must demonstrate evidence of adherence to the waste hierarchy as set out in the Waste Regulations (2011) ³ .	X		
To be an active member of the Supply Chain Sustainability School, with a preference for bronze, silver or gold membership.	X		
Inform Willmott Dixon of all social value activities you complete within your organisation. <i>Original clause split into two new clauses to make requirement clearer.</i>	X		
To support Willmott Dixon and our projects to meet our social value commitments and KPIs. <i>New clause – second part of social value clause listed above.</i>	X		
To work and engage with SMEs and Social Enterprises. <i>Original clause split into two new clauses, one mandatory and one preference.</i>	X		
All strategic, Cat A and Cat A+ Partners to have a Sustainability Policy and/or a Sustainable Procurement Policy. This is to include a commitment to eliminating all avoidable single use plastic by 2030. <i>Single use plastic requirement added and requirement to have this by year end.</i>		31/03/2023	

² See <https://www.unglobalcompact.org/what-is-gc/mission/principles> principles 7-9

³ Examples of best practice to demonstrate adherence to the waste hierarchy, include actions such as: use of larger pack sizes to reduce the amount of packaging per unit; collection and reuse packaging and protective materials as many times as possible; using cardboard wrapping where appropriate instead of plastic wrapping (e.g. bubble wrap); supplying products that are available in concentrated forms; promote the use of manufacturer branded pallets to ensure clear ownership and encourage repatriation; avoid polystyrene packaging as it cannot be easily recycled or reused

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<i>Manufacturers only</i> - To provide evidence to show full transparency on origin of products (extraction, manufacturing, distribution, transportation distance) and identify all parties in their supply chain tiers when requested.		31/03/2023	
<i>Manufacturers only</i> - To provide evidence of the recycled content of products as a percentage and, upon request by Willmott Dixon, plans to further maximise recycled content in specific products where practicable. Reworded to require evidence of recycled content is provided.		31/03/2024	
To have, or be able to demonstrate a commitment to securing, a fully accredited environmental management system. e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body			X
Preference will be given to those supply chain partners who can demonstrate that a robust carbon footprinting exercise has been carried out to quantify the carbon impacts across each life cycle stage of the product(s) supplied. New – replaces embodied carbon/plastic/recycled content requirement and splits into three new clauses.			X
Quantify the plastic and recycled content in their key products we procure upon request. Second clause of these three new clauses.			X
Products to comply with a recognised scheme for responsible sourcing of materials such as BES 6001 or other sector schemes compliant with BS 8902. Minor reword.			X
Waste reduction plan in place that goes beyond minimum compliance and includes take back and reuse of excess products and eliminating all avoidable packaging waste and single use plastics ⁴ . 'Plan' instead of 'strategy'.			X
Identify and demonstrate opportunities to reduce reliance on virgin materials in products entering the production chain.			X
To provide lifecycle costing information to inform product selection e.g. associated maintenance & deconstruction costs over 60-year building life.			X
Preference will be given to those supply chain partners who can provide EN 15804 compliant Environmental Product Declarations (EPD) for their products. Third clause of three new clauses.			X
To provide detail of spend and engagement with SMEs and Social Enterprises. Original clause split into two new clauses to make work and engagement requirement mandatory.			X
<i>Goods partners only</i> – To pay the real living wage to their workforce.			X
To ensure and promote equality and diversity in their workforce. 'Equality and diversity' replaced 'equal opportunities for women and men' to broaden requirement out.			X
To engage with local labour and provide locally sourced goods other than where a strategic agreement exists.			X

⁴ Where the use of a product cannot be avoided, alternatives to single use plastic will be sought. For alternatives we will have a preference to the hierarchy of: reusable products (e.g. reusable packaging); materials from renewable sources that are recyclable and/or biodegradable (e.g. FSC paper, mycelium packaging etc.); other materials that have a high recycling rates (e.g. glass, steel, and tin). Where single-use plastic is unavoidable, or necessary due to regulation, we will seek plastic with a high percentage of recycled content, that is fully recyclable and compatible with local waste collections.

4.2. STRATEGIC GOODS

In addition to those requirements set out in section 4.1, strategic goods suppliers should also comply with the following requirements:

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
Demonstrate that a robust carbon footprinting exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s) ⁵ . <i>New – replaces embodied carbon/plastic/recycled content requirement and splits into three new clauses.</i>	X		
To have a waste reduction plan in place that goes beyond minimum compliance and includes take back and reuse of excess products <i>and eliminating all avoidable packaging waste and</i> single use plastics.	X		
<i>Manufacturers only</i> - To have a fully accredited environmental management system. e.g. EMAS, ISO 14001 or BS 8555 from a UKAS registered certification body. <i>Made mandatory</i>	X		
<i>Manufacturers only</i> – Provide the plastic content of the key products supplied to Willmott Dixon. <i>Second clause of these three new clauses.</i>	X		
<i>Manufacturers only</i> – Provide the recycled content of the key products supplied to Willmott Dixon upon request	X		
<i>Manufacturers only</i> – Provide a written embodied carbon reduction plan with targets/milestones to achieve a 55% reduction from the baseline assessment by 2030 <i>New</i>		31/03/2024	
<i>Manufacturers only</i> – Provide a written carbon reduction plan with defined targets/milestones to become net zero carbon in operation. <i>New</i>		31/03/2024	

⁵ Key products to be agreed with Willmott Dixon National Supply Chain Team.

4.3. KEY GOODS AND PRODUCTS

Suppliers of the following products must also demonstrate compliance with requirements listed in the below table:

PRODUCT TYPE	REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
CONCRETE AND CEMENT	To comply with a recognised scheme for responsible sourcing such as BES 6001 or other sector schemes compliant with BS 8902.	X		
	To provide evidence of the recycled content of products as a percentage and, upon request by Willmott Dixon, plans to further maximise recycled content in specific products. Now mandatory requirement for specific products.	X		
	To use low carbon concrete and provide Willmott Dixon with the embodied carbon content upon request. New	X		
DRYLINING AND PARTITIONING – New section so all requirements new	Demonstrate that a robust carbon footprinting exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X		
FINISHES AND SEALANTS	No paints or other finishes to contain lead.	X		
	To ensure only low and zero VOC paints ⁶ , finishes and sealants are offered to Willmott Dixon (e.g. water based instead of solvent based paint for external walls) where practicable.	X		
	Preference will be given to those partners that can design out the use of high-VOC products by selecting alternative materials and finishes where practicable and appropriate. New in the table but was present in previous versions in the text.			X
INFORMATION TECHNOLOGY	Photocopiers and networked printers (excluding wide format printers) to have secure print and have default setting of double-sided and black and white printing.	X		
	Products to be rated low energy consumption as recognised by Energy Star or similar.	X		
	Must include built-in power management features.	X		
	Equipment manufacturers to have a managed asset recovery service to take back and recycle equipment.	X		

⁶ Long-term exposure to Volatile Organic Compounds (VOCs) can have serious negative effects on human health. These chemicals can be found in paints, sealants, glues and internal finishes. Our requirements above set with the intention to limit the potential health and environmental impacts associated with high VOC content products.

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	Request that information on the full life-cycle performance of a product is made available by the supplier so it can be evaluated by Willmott Dixon during procurement.	X		
	Provide evidence that used IT equipment is recycled through a take back scheme in accordance with the WEEE Regulations at an Approved Authorised Treatment Facility (AATF).	X		
INSULATION	The Global Warming Potential (GWP) of insulants to be less than 5, or less than 8 if aerosol based.	X		
NATURAL STONE	To procure natural dimensional stone from suppliers demonstrating leadership in the ethical stewardship of their supply chain. ⁷	X		
	Demonstrate that a robust carbon footprinting exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X		
	All supply chain partners to ensure that only LEDs are used for site lighting. Reword.	X		
PLANT & EQUIPMENT	Non-road diesel engines should meet the following standards as a minimum: <ul style="list-style-type: none"> • Small plant (<3T): Stage IIIB • Medium plant (3T – 13T): Stage IIIB (Stage IV for Telehandlers) • Large Plant (>13T): Stage IV Reworded and updated to reflect recommendations from the Supply Chain Sustainability School Plant Category Group – Minimum Standards.	X		
	Preference will be given to those partners that can demonstrate compliance with or are working towards compliance with Stage V. Reword.			X
	Preference will be given to those supply chain partners that can provide electric machinery/plant for use on Willmott Dixon sites. Reword – replaced the requirement to replace plant every 18 months.			X
POLYVINYL CHLORIDE (PVC)	PVC manufacturers must have phased out or be working towards and reporting on the phasing out of heavy metals such as lead, mercury or cadmium	X		
	To either operate a take-back scheme that offers a closed-loop recycling system or identify a mechanical recycling system for unbonded installation waste.	X		
	All chemicals used in manufacture of PVC to be registered under REACH ⁸ .	X		
	Preference will be given to those PVC products that can demonstrate recycled content, where this is not precluded by third-party performance requirements. New in the table but was present in previous versions in the text.			X
	To provide alternatives to, or design out the use of, PVC products containing Phthalates.			X
STEEL AND ALUMINIUM	Demonstrate that a robust carbon footprinting exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X		

⁷ Recognised schemes include compliance with a recognised responsible sourcing scheme certified by a third party, or membership of the following: Ethical Trading Initiative (ETI Stone Group), The Ethical Stone Register, the TFT Responsible Stone Programme (Earthworm), WiN=WiN Fair Stone, UN Global Compact and membership of the Stone Federation GB.

⁸ See <https://www.hse.gov.uk/reach/about.htm> for further information.

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	To provide evidence of the recycled content of products as a percentage and, upon request by Willmott Dixon, plans to further maximise recycled content in specific products. Now mandatory requirement for specific products.	X		
	To comply with a recognised scheme for responsible sourcing such as BES 6001 or certification to CARES, ECO-Reinforcement or the Aluminium Stewardship Initiative. BES 6001 replaces BS 8666 which is not a responsible sourcing scheme.			X
TIMBER & TIMBER PRODUCTS	All fixed timber & temporary timber must be from legal and sustainable sources (PEFC or FSC), or Grown in Britain, and accompanied by Chain of Custody information and evidence of this issued to Willmott Dixon. ⁹	X		
	All supply chain members providing timber must be able to evidence compliance with obligations of the UK Timber Regulation (UKTR). ¹⁰ when required. Replaced EUTR with UKTR	X		
	Avoid products with added urea formaldehyde where possible.			X

⁹ The Timber Trade Federation has more information available on the chain of custody evidence required to prove compliance. See <https://ttf.co.uk/courses/timber-trade-topics/sourcing-sustainable-timber/>

¹⁰ The UK Timber Regulation (UKTR) came into force on 1 January 2021, replacing the European Timber Regulation (EUTR) and Forest Law Enforcement Governance and Trade (FLEGT) which no longer apply in Great Britain. See <https://www.gov.uk/guidance/regulations-timber-and-flegt-licences> for further information.

5.0. WORKS SUPPLY CHAIN PARTNERS

5.1. LABOUR AND TRADE

Below is a list of requirements for all labour and trade supply chain partners. Unless otherwise stated, the requirements apply to all partners, irrespective of category or strategic/non-strategic status:

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
To comply with all UK employment legislation to ensure that workers have the right to work in the UK and provide evidence and compliance with Willmott Dixon when requested.	X		
Not to require or permit compulsory overtime in your workforce. New	X		
Upon request all partners must be able demonstrate evidence of a waste reduction plan for how they will minimise construction waste arisings, with a preference for specific measures that eliminates avoidable packaging and single-use plastics. Added specific single-use plastic requirement	X		
Maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested.	X		
All partners supplying and using HVO fuel on Willmott Dixon projects must provide a copy of Proof of Sustainability and to ensure that all HVO is responsibly sourced in line with the International Sustainability and Carbon Certification. New	X		
To pay the real living wage to their workforce.	X		
All partners to provide either electric plant and machinery or plant and machinery that is compatible with HVO. New		31/03/2024	
Preference will be given to those supply chain partners that baseline their carbon footprint and report it via the Supply Chain Sustainability School online carbon tool on an annual basis. New.			X
Promote, create and manage apprenticeship opportunities.			X

5.2. GROUNDWORKER PARTNERS

Below is a list of requirements for all labour and trade supply chain partners. Unless otherwise stated, the requirements apply to all partners, irrespective of category or strategic/non-strategic status:

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
By end-2022, Cat A and Cat A+ groundworker partners that baseline their carbon footprint and report it via the Supply Chain Sustainability School online carbon tool on an annual basis. New	X		
By end-2022, Cat A and Cat A+ groundworker partners to commit to achieving net zero carbon in their own operations by 2030. New	X		
Groundworker partners to support the reuse of excavation arisings as material in line with the waste hierarchy. New	X		
By end-2022, Cat A & Cat A+ groundworker partners to have a plan in place to reduce diesel use by 2025 and eliminate before 2030. Removed 'within two years' and added time bound requirements and made mandatory.	X		

5.3. DRYLINING/PARTITIONING & M&E WORKS PARTNERS

Below is a list of requirements relevant to drylining/partitioning and M&E works partners only.

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
By end-2022, Cat A and Cat A+ partners to baseline their carbon footprint and report it via the via the Supply Chain Sustainability School online carbon tool on an annual basis. New	X		
By end-2022, Cat A and Cat A+ partners to develop a commitment to achieving net zero carbon in their operations by 2030. New	X		

5.4. WASTE MANAGEMENT & DEMOLITION

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
Construction waste management partners to demonstrate a minimum diversion from landfill of 95% for construction waste, unless agreed with the Group Environment Manager.	X		
Demolition Partners: Upon request to, demonstrate evidence of a waste reduction plan in line with the waste hierarchy as specified in the Waste Regulations (2011) for demolition waste arisings.	X		
By end-2022, demolition contractors to support and provide plans for reuse of demolition material in line with the waste hierarchy. New	X		
To have, or be able to demonstrate a commitment to providing a verification report to evidence compliance with PAS 402:2013. Reworded		31/03/2023	
Preference will be given to those supply chain partners that baseline their carbon footprint and report it via the via the Supply Chain Sustainability School online carbon tool on an annual basis. New.			X

5.5. AGENCY LABOUR & SITE SECURITY

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
To comply with all UK employment legislation to ensure that workers have the right to work in the UK and provide evidence and compliance with Willmott Dixon when requested. <i>Wording simplified.</i>	X		
To comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy.	X		
Use security services from companies approved by the Security Industry Authority (SIA) and to ensure all security guard personnel have a current SIA licence.	X		
To pay the real living wage to all their workforce.		31/12/2023	
Engage local labour and provide opportunities for SMEs			X

6.0. DESIGN & CONSULTANCY SUPPLY CHAIN PARTNERS

Design and consultancy partners should ensure compliance with Appendix B2 – *Standard additional conditions applicable to sub-contracts with design by sub-contractor.*

REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
All consultants, designers, professional services and their employees must ensure that their services meet the principles and objectives set out within our Sustainable Procurement Policy.	X		
Comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy.	X		
Preference will be given to those supply chain partners that baseline their carbon footprint that and report it via the via the Supply Chain Sustainability School online carbon tool on an annual basis. New.			X

7.0. PROCUREMENT REQUIREMENTS SPECIFIC TO WILLMOTT DIXON

The below list of product/service types apply specifically to Willmott Dixon. This acts as a guide for our own people when making purchasing decisions.

For procurement of general office consumables, this section should be read in conjunction with the [RMS-RE-146: Sustainable Office – Procurement Requirements](#) document.

PRODUCT/ SERVICE TYPE	REQUIREMENT	MANDATORY	MANDATORY IN DEVELOPMENT	PREFERENCE
CATERING	Request that supply chain caterers supply food using Fairtrade produce, locally sourced and currently in season where practicable.			X
COMMERCIAL VEHICLES	All commercial vehicles procured, by or for Willmott Dixon, must comply with the latest European engine emission standards, and be fitted with speed restrictors.	X		
	Tyre pressure monitoring systems (TPMS) should be specified to all commercial vehicles used by Willmott Dixon, if not fitted as standard vehicles must be supplied with manual tyre pressure gauges.	X		
	Consider the use of telematics systems and adopt where there are commercial benefits to WD vehicles to allow effective route planning and reduce unnecessary mileage.			X
EXTERNAL PUBLICATIONS & PRINTED MEDIA	External publications to use standard paper sizes sourced from either FSC or PEFC certified sources, uncoated paper stock is preferred. <i>Added FSC/PEFC requirement.</i>	X		
	Vegetable oil ink should be specified for external publications.	X		
	Minimise the use of printed media and publications.			X
SITE ACCOMMODATION	Temporary accommodation units must be installed on site with submetering and cabin zoning to meet requirements on energy and water saving measures and enable Willmott Dixon to achieve its cabin efficiency target. <i>Added cabin efficiency target requirement.</i>	X		
	All white goods purchased for the purposes of temporary accommodation must be a minimum of A-rated under the EU Energy Efficiency Labelling Scheme. <i>New in the table but was present in previous versions in the text.</i>	X		

8.0. GLOSSARY OF TERMS

Carbon Footprint – The total amount of greenhouse gas emissions produced directly and indirectly by a person, organisation, event, or product

Chain of Custody – The process of ensuring that a forest product has come from a legal and responsible source

Environmental Management System (EMS) – Provides a framework for an organisation of any size to manage its significant environmental impacts

Embodied Carbon – The carbon emissions associated with the energy and industrial processes used in the processing, manufacture and deliver of materials, products and components required to construct, maintain and deconstruct a building.

EPD (Environmental Product Declaration) – An independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products in a credible way

Global Warming Potential (GWP) – The relative potency of a greenhouse gas relative to one unit of carbon, taking into account how long it remains in the atmosphere

Real Living Wage – rate paid by employers that goes above and beyond the national minimum wage to ensure that their employees are paid a wage that covers the cost of living

SME (Small and Medium-sized Enterprise) – An organisation with less than 250 employees and an annual turnover of less than €50 million or a balance sheet of less than €43 million

Social Enterprise – A type of organisation that prioritises social impact over profit for their owners and shareholders.

Social Value – The value delivered to society through business activities.

Strategic Partner – Category A/A+ supply chain partners that are bound by a separate strategic agreement focusing on a specific product, component, or assembly