

**WILLMOTT DIXON GROUP
SUSTAINABLE PROCUREMENT POLICY**

January 2015

FINAL

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1. SUMMARY TABLE

| Ref | Description | Mandatory | Preference | Where technically feasibly |
|---|--|-----------|------------|----------------------------|
| CONSTRUCTION PRODUCT MANUFACTURERS New Section replaces the Implementation Matrix | | | | |
| 3.1 | To have a full and relevant environmental policy | X | | |
| 3.1 | To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body. Added UKAS requirement | | X | |
| 3.1 | Responsible sourcing of materials to BES 6001, BS 8902 | | X | |
| 3.1 | Product manufacturers to have, or be working towards BS EN 15804 compliant EPD | | X | |
| 3.1 | Share best practice, new products & innovation with Willmott Dixon & our supply chain New | | X | |
| 3.1 | Provide technical information to support any performance related product claims when requested New | X | | |
| 3.1 | Comply with the provisions of the UN Global Compact principles New | X | | |
| CONSTRUCTION PRODUCT DISTRIBUTERS New Section replaces the Implementation Matrix | | | | |
| 3.2 | To have a full and relevant environmental policy | X | | |
| 3.2 | To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body. Added UKAS requirement | | X | |
| 3.2 | Active members of the Supply Chain Sustainability School. New | | X | |
| GLOBAL WARMING POTENTIAL | | | | |
| 3.4 | The Global Warming Potential (GWP) of insulants to be less than 5 Changed to reflect Insulants | X | | |
| VOLATILE ORGANIC COMPOUNDS | | | | |
| 3.5 | Use of low or zero VOC paints and sealants | | | X |
| 3.5 | Design out the use of high VOC products | | | X |
| 3.5 | Ensure that all materials and substances used comply with relevant legislation | X | | |
| 3.5 | No paints or other finishes to contain lead | X | | |
| PAPER | | | | |
| 3.6 | Minimise the use of printed media and publications New | | X | |
| 3.6 | Paper must be sourced under a certified forest management scheme | X | | |
| 3.6 | Paper should minimise the use of virgin fibre and contain a minimum of 50% recycled fibre. | | X | |
| 3.6 | Paper must be: elemental chlorine-free (ECF), processed chlorine-free (PCF) and total chlorine-free (TCF) | X | | |
| 3.6 | External publications to use standard paper sizes, uncoated paper stock is preferred (Aligned with Brand manual) | | X | |
| 3.6 | Vegetable oil ink should always be specified for external publications Aligned with the WD corporate brand manual | | X | |
| TIMBER & TIMBER PRODUCTS | | | | |
| 3.7 | All fixed timber & temporary timber to be from legal and sustainable sources (PEFC or FSC) | X | | |
| 3.7 | Preference for timber which is assured as 'Grown in Britain' New | | X | |
| 3.7 | Provide the necessary data each quarter to enable Willmott Dixon to complete the UKCG timber reporting requirements New | X | | |
| 3.7 | All supply chain members providing timber must be able to evidence compliance with obligations of the EU Timber Regulation (EUTR) if required. New | X | | |
| NATURAL DIMENSIONAL STONE | | | | |
| 3.8 | Give preference to natural dimensional stone suppliers demonstrating leadership in the ethical stewardship of their supply chain. New | | X | |
| POLYVINYL CHLORIDE (PVC) | | | | |
| 3.9 | PVC manufacturers must have phased out, or be working towards and reporting on the phasing out of heavy metals | X | | |
| 3.9 | A preference to be given for PVC products with a recycled content Removed the specific percentage requirement | | X | |
| 3.9 | All chemicals used in manufacture of PVC to be registered under REACH | X | | |
| 3.9 | Either operate a take-back scheme or identify a mechanical recycling system for installation waste clarified installation waste | X | | |
| ENERGY SUPPLY | | | | |
| 3.10 | Use of our appointed external energy advisors to evaluate the environmental impact of the available suppliers and sources when purchasing energy supply contracts for our sites and offices updated | X | | |
| TRANSPORT | | | | |
| 3.11 | Maximum emissions for all company cars procured to be in line with group policy which is reviewed annually. updated | X | | |
| 3.11 | All commercial vehicles procured by Willmott Dixon must comply with the latest European engine emission standards, and be fitted with speed restrictors. New | X | | |
| 3.11 | Tyre pressure monitoring systems (TPMS) should be specified to all commercial vehicles, if not fitted as standard vehicles must be supplied with manual tyre pressure gauges. New | X | | |
| 3.11 | The following measures must also be considered for commercial vehicles; GPS trackers, engine remapping for improved efficiency, low rolling resistance tyres and the use of electric/hybrid vehicles. New | | X | |



| Ref | Description | Mandatory | Preference | Where technically feasible |
|--|--|-----------|------------|----------------------------|
| PACKAGING | | | | |
| 3.12 | All manufacturers, suppliers and subcontractors must apply the waste hierarchy to packaging | X | | |
| 3.12 | Use of larger pack sizes to reduce the amount of packaging per unit | | X | |
| 3.12 | Use cardboard wrapping where appropriate instead of plastic wrapping i.e. bubble wrap | | X | |
| 3.12 | Collect and reuse packaging as many times as possible | | X | |
| 3.12 | Supply products that are available in concentrated forms | | X | |
| 3.12 | Promote the use of manufacturer branded pallets | | X | |
| 3.12 | Polystyrene packaging should be avoided | | X | |
| MECHANICAL SITE PLANT | | | | |
| 3.13 | Site plant or equipment including generators to be no more than 18 months old | | X | |
| 3.13 | Preference to be given to the use of Stage III diesel engines as a minimum Updated | | X | |
| TEMPORARY & FIXED OFFICES | | | | |
| 3.14 | Temporary accommodation units must comply with the current Group Site Accommodation guidance note which includes energy and water saving measures. | X | | |
| 3.14 | Hand towels are not to be provided where hand dryers are installed New | X | | |
| 3.14 | The procurement of fixed offices, to give consideration to the likely energy performance of the building and proximity to public transport networks | X | | |
| 3.14 | All white goods for use in offices to be a minimum of A-rated | X | | |
| 3.14 | Willmott Dixon shall incorporate the Green Lease for our new or renewal leased offices Added reference to the WD Green Lease | | X | |
| 3.14 | Separate metering facilities for individual utilities for our leased offices | | | X |
| 3.14 | Undertake an assessment of the environmental performance for our leased offices | X | | |
| 3.14 | Agreement of a waste segregation strategy Added requirement from the WD Green Lease | X | | |
| TRADE CONTRACTORS | | | | |
| 4.1 | Demonstrate continuous development and improvement | | X | |
| 4.1 | To have a full and relevant environmental policy | X | | |
| 4.1 | To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body. Added UKAS requirement | | X | |
| 4.1 | Maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested. New Item | X | | |
| 4.1 | To be receptive to the promotion and management of apprenticeship opportunities and/or training and development of site operatives. | | X | |
| 4.1 | Comply with all UK employment legislation and ensure that workers have the right to work in the UK. New item | X | | |
| 4.1 | To be active members of the Supply Chain Sustainability School. New Item | | X | |
| PROFESSIONAL SERVICES | | | | |
| 5.1 | All providers of professional services and their employees to comply with the principles and objectives set out within our procurement policy. | X | | |
| 5.1 | All personnel and key stakeholders involved with have the necessary skills, knowledge and experience, and provide evidence if requested. | X | | |
| INFORMATION TECHNOLOGY | | | | |
| 5.2 | Photocopiers and networked printers (excluding wide format printers) to be capable of double-sided printing and secure print Added secure print and clarified wide format printers | X | | |
| 5.2 | The procurement and use of stand-alone desktop printers is to be discouraged where larger Multi-Function Devices (MFD's) exist. New item | | X | |
| 5.2 | Products to be rated low energy consumption as recognised by Energy Star or similar | X | | |
| 5.2 | Must include built-in power management features | X | | |
| 5.2 | The full life-cycle performance of a product to be considered during procurement | X | | |
| 5.2 | Equipment manufacturers to have a managed asset recovery service to take back and recycle equipment | X | | |
| WASTE & RECYCLING | | | | |
| 5.3 | Waste service providers must demonstrate a minimum diversion from landfill of 90% for construction waste, unless agreed with the Group Environment Manager New item | X | | |
| 5.3 | Waste service providers encouraged to report in accordance with PAS 402 | | X | |
| CATERING | | | | |
| 5.4 | Supply chain caterers to select food using Fairtrade produce, locally sourced and food currently in season Aligned with IMS procedures | | X | |
| 5.4 | All tea and coffee to be either Fairtrade or Rainforest Alliance certified | X | | |
| 5.4 | Where water dispensers are required, we shall endeavour to install mains supplied filtered water dispensers to avoid the use of bottled water and bottled water dispensers. New item | | | X |
| AGENCY LABOUR & SITE SECURITY | | | | |
| 5.5 | Where agency staff, cleaners, site labour or site security personnel are engaged, supply chain companies must have appropriate systems and processes in place to ensure compliance with all UK employment legislation (including the National Minimum Wage, the Agency Worker Regulations 2011 and the Asylum and Immigration Act 2006). | X | | |
| 5.5 | Use security services from companies approved by the Security Industry Authority (SIA) | | X | |
| 5.5 | All security guard personnel on our projects to have a current SIA licence | X | | |

2. SCOPE OF THIS POLICY

The procurement of goods, works and services has a significant impact on our performance as a business. This policy applies to the Willmott Dixon Group, our supply chain, including designers, specifiers, trade contractors, product manufacturers and product distributors. It covers:

Goods – The physical materials from manufacturers and suppliers (including energy) that are purchased by Willmott Dixon, either directly or on our behalf.

Works – The procurement of labour and trade contractors that work on our projects.

Services – The procurement of professional skills and expertise including design consultancy, site security, waste and information technology.

3. GOODS

3.1 CONSTRUCTION PRODUCT MANUFACTURERS

For companies which manufacture, fabricate or assemble goods, preference will be given to those who can demonstrate that they:

- have a full and relevant environmental policy,
- hold or are working towards a full accredited environmental management system e.g. EMAS, BS8555 or ISO 14001 from a UKAS registered certification body,
- comply with a recognised responsible sourcing scheme in line with UKCG commitments. This includes certification to BES 6001 or through the development of a sector specific scheme that complies to BS 8902, verified by a third party,
- have, or are working towards adoption of, BS EN 15804 compliant EPD (Environmental Product Declaration),
- share best practice, new products and innovation with Willmott Dixon and our supply chain,
- can provide technical information to support performance related product claims when requested,
- comply with the provisions of the [UN Global Compact principles](#).

3.2 CONSTRUCTION PRODUCT DISTRIBUTERS

We require distributors, merchants and hire companies to ensure that they comply fully with this policy. Willmott Dixon will evaluate companies to the extent that they:

- have a full and relevant environmental policy,
- hold or are working towards a full accredited environmental management system e.g. EMAS, BS8555 or ISO 14001 from a UKAS registered certification body,
- are active members of the [Supply Chain Sustainability School](#).

3.3 CIRCULAR ECONOMY

The cost of raw materials is increasing every year, driven by increasing global demand and scarcity. Circular economy products and services offer a valuable opportunity to enhance the sustainability of construction projects and contribute to the long term viability of the UK construction industry. We are open to exploring new business models with our suppliers and clients, considering repair before replacement, designing buildings



for deconstruction, promoting materials take-back schemes and increasing recycled content, but not at the expense of increasing other impacts.

3.4 GLOBAL WARMING POTENTIAL (GWP)

To reduce the contribution we make to climate change, we require our supply chain to specify and use insulants with a GWP of less than 5.

3.5 VOLATILE ORGANIC COMPOUNDS (VOCs)

Long-term exposure to VOCs can have a serious negative effect on human health. These chemicals can be found in products including paint, roofing products, sealants, glues and internal finishes.

To minimise the impact of materials containing VOCs, Willmott Dixon will directly, and through our supply chain:

- use low or zero-VOC paints and sealants,
- design out the use of high-VOC products by selecting alternative materials and finishes where available,
- ensure that all materials and substances used comply with relevant legislation,
- not use paints or other finishes containing lead.

3.6 PAPER, PRINTING & PUBLICATIONS

Willmott Dixon minimises the use of printed media through larger screens and the use of mobile devices where appropriate, and will always consider the use of electronic publications. However where this is not possible, in line with our [Corporate Brand Manual](#), all paper for printing, photocopying and external publications must be sourced under a certified forest management scheme to either PEFC or FSC. Paper products should minimise the use of virgin fibre and contain a minimum of 50% recycled fibre.

All paper products must be produced using non-chlorinating bleaching methods: elemental chlorine free, processed chlorine free and total chlorine free including oxidising and reductive bleaching. Printed publications must utilise standard paper sizes to minimise waste. Uncoated stock is preferred. Vegetable oil ink should always be specified and the environmental impact of specialist finishes should be carefully considered.

3.7 TIMBER & TIMBER PRODUCTS

Willmott Dixon is committed to sourcing timber and timber products for both temporary and permanent inclusion in our projects from legal and sustainable sources as defined by the UK Government Central Point of Expertise on Timber (CPET). We work to a common reporting methodology agreed by the UKCG. There are two types of evidence required to prove the legality and sustainability of timber and timber products:

1. Cat A evidence is preferred, and can be provided through a scheme recognised by CPET, both PEFC and FSC are acceptable with a full chain of custody.
2. Cat B evidence is alternative documentary evidence which provides assurance that the source is legal and sustainable. This type of evidence can be used where the supplier or contractor is *not* certified. However, this is classed as being a "[broken chain of custody](#)." In these cases an auditable trail to the certified supplier must be provided in line with our Environmental Guidance Note - Sustainable Timber or as [CPET Category B](#). We also recognise timber traceable to a forest with a fully implemented forest management plan in line with the UK Forestry Standard (UKFS).



In addition to providing the above evidence, we require our supply chain to provide us with the necessary data at the end of each quarter to complete the [UKCG timber reporting requirements](#).

Willmott Dixon is a supporter of [Grown in Britain](#) and will give preference to the use of timber and timber products which are assured as 'Grown in Britain', to create a more sustainable future for our forests and woodlands.

All supply chain members providing timber must be able to evidence compliance with obligations of the [EU Timber Regulation](#) (EUTR) if required.

3.8 NATURAL STONE

Willmott Dixon recognises the inherent risks in sourcing dimensional natural stone, and will give preference to suppliers demonstrating leadership in the ethical stewardship of their supply chain.

This can be evidenced through compliance with a recognised responsible sourcing scheme certified by a third party. We also recognise membership of, and participation in the [Ethical Trading Initiative](#) (ETI Stone Group), the TFT Responsible Stone Program, or the United Nations Global Compact and membership of the [Stone Federation GB](#).

3.9 POLYVINYL CHLORIDE (PVC)

The manufacture and disposal of PVC creates toxic chemicals. When considering alternatives to PVC, we must consider the economic, environmental and social impacts across their whole life cycle, including fitness for purpose, exposure, workability, maintenance, dismantling, and ease of recycling.

Where PVC is required to be used we seek to work with suppliers who minimise impacts by having the following processes in place:

- 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.
- PVC products must be recyclable and all waste produced during the manufacturing process must be recycled. A preference will be given for products with a recycled content unless this is specifically precluded by third-party performance requirements, such as BBA, BS:EN.
- All chemicals used in the production of virgin PVC must be registered for use under the regulations with the European Chemical Agency (REACH).
- Either operating a take-back scheme that offers a closed-loop recycling system or identifying a mechanical recycling system for installation waste.

3.10 ENERGY SUPPLY

Since 2012 we have offset the direct emissions that we generate through our transport, offices and construction processes, making us a carbon neutral business. We have declared our intent to be more energy efficient and look to source energy from renewable and low carbon sources.

Willmott Dixon has appointed external energy advisors to consolidate the purchasing of energy across our portfolio of sites and offices. This ensures we receive the best market rates, have high quality data for our carbon reporting, and the environmental impact of the available suppliers is considered.

3.11 TRANSPORT

Willmott Dixon has group policies to reduce CO₂ emissions, distances travelled and to procure a more efficient fleet. We measure and monitor all business-related miles online. We set a maximum emission level for all company cars which is reviewed annually; since July 2013 all company cars must be less than 120g/km of CO₂.

All commercial vehicles procured by Willmott Dixon must comply with the latest European engine emission standards, and be fitted with speed restrictors. Tyre pressure monitoring systems (TPMS) should be specified, if not fitted as standard, and vehicles must be supplied with manual tyre pressure gauges. The following measures must also be considered; GPS trackers, engine remapping for improved efficiency, low rolling resistance tyres and the use of electric/hybrid vehicles.

3.12 PACKAGING

Willmott Dixon is committed to reducing waste. We will engage with manufacturers, suppliers and contractors to jointly develop strategy to reduce packaging on our projects. We require our supply chain to minimise the use of packaging, ensure that any packaging is collected for re-use. Where this is not practical it must be recyclable.

The actions listed below are considered best practice:

- Use of larger pack sizes to reduce the amount of packaging per unit.
- Collect and reuse packaging and protective materials as many times as possible.
- Using cardboard wrapping where appropriate instead of plastic wrapping i.e. bubble wrap.
- Supply products that are available in concentrated forms.
- Promote the use of manufacturer branded pallets to ensure clear ownership and encourage repatriation.
- Polystyrene packaging should be avoided as it cannot be easily recycled or reused.

Willmott Dixon may require manufacturers, suppliers or subcontractors to take back any excessive packaging for subsequent reuse or recycling at their own expense.

3.13 MECHANICAL SITE PLANT

To reduce carbon emissions and fuel we will endeavour to procure all plant and equipment efficiently-sized for the task in hand and which is no more than 18 months old. Preference will be given to the use of Stage III diesel engines as a minimum, as this plant is more energy efficient and cost-effective to run. We encourage our supply chain to do the same.

Our policy on plant is in line with [European emission standards](#) for new non-road diesel engines which apply to any machine either built in or imported for sale into the UK. The standards have been developed to radically reduce particulates, CO₂ and NO_x emissions from engines.

3.14 TEMPORARY & FIXED OFFICES

Temporary accommodation units provided by Willmott Dixon must comply with the current Group Site Accommodation [guidance note](#) which includes energy and water saving measures. Hand towels are not to be provided where hand dryers are installed.



When seeking new fixed office premises, we will give consideration to the likely energy performance of the building and its proximity to public transport networks. All white goods purchased for use in offices must be a minimum of A-rated under the EU Energy Efficiency Labelling Scheme.

With regard to new or renewal leases for our fixed offices we will aim to put in place a memorandum of understanding (MoU) with our landlords, covering energy and environmental issues as set out in our Green Lease. The MoU should specify the following:

- Separate metering facilities for individual utilities, individual occupiers (in a multi-let building) and special uses (e.g. data centres).
- The appointment of a suitably qualified person to undertake an assessment of the environmental performance of the building and premises and to advise upon a strategy for implementing the aims and objectives.
- Joint targets for energy/CO₂ reductions which could be linked to specific EPC/DEC ratings.
- Agreement of a waste segregation strategy to allow for maximum recycling of waste, coordinating with other tenants where possible to optimise the waste management strategy for the building and premises.
- Facilities to encourage the use of more sustainable transport modes.

4. WORKS

4.1 TRADE CONTRACTORS

Willmott Dixon has processes in place to ensure collaboration and integration for best practice and to deliver innovative solutions. Willmott Dixon will evaluate trade contractors through the use of [Builder's Profile](#) and procure work through its supply chain members to the extent that they:

- demonstrate continuous development and improvement,
- have a full and relevant environmental policy,
- have, or be meaningfully working towards, a full accredited environmental management system e.g. EMAS, BS8555 or ISO 14001 from a UKAS registered certification body, with targets, objectives and an improvement programme,
- maintain a trained and competent workforce appropriate to the duties they are undertaking, and provide evidence if requested,
- are receptive to the promotion and management of apprenticeship opportunities and/or training and development of site operatives,
- comply with all UK employment legislation and ensure that workers have the right to work in the UK,
- are active members of the [Supply Chain Sustainability School](#).

5. SERVICES

5.1 PROFESSIONAL SERVICES

We rely on our professional service providers to help deliver sustainable procurement and development. All providers and their employees who create drawings and



specifications must be familiar with and adhere to the principles and objectives set out within this policy. We require that all personnel and key stakeholders involved have the necessary skills, knowledge and experience, and provide evidence if requested.

5.2 INFORMATION TECHNOLOGY

Willmott Dixon will ensure that, when purchasing or leasing IT equipment, including mobile phones, the following objectives are met:

- All networked photocopiers and printers (excluding wide format printers) must be capable of double-sided printing and secure print.
- The procurement and use of stand-alone desktop printers is to be discouraged where larger Multi-Functional Devices (MFDs) exist.
- Products must be rated low energy consumption as recognised by Energy Star or a similar standard with built-in power management features and automatic switch off when not in use, except for equipment that needs to run all the time, such as servers.
- The full life-cycle performance of a product should be considered during procurement.
- Equipment manufacturers must have a managed asset recovery service to take back and recycle equipment.

5.3 WASTE & RECYCLING

Willmott Dixon carries out regular audits of waste contractors to ensure that they have advanced waste management capabilities that guarantee maximum segregation and recovery.

To support our zero waste to landfill ambition, we only work with companies who can demonstrate a minimum diversion from landfill of 90% for mixed construction waste, unless agreed with the Group Environment Manager, and we encourage reporting in accordance with PAS 402. Trade contractors employing their own waste contractors to remove waste material from our projects must operate to the same standard.

5.4 CATERING

Willmott Dixon has an established process for the procurement of catering services delivered across our sites, offices, events and conferences. Our supply chain caterers are encouraged to select Fairtrade produce, locally sourced and food currently in season. All tea and coffee should be either Fairtrade or Rainforest Alliance certified.

Where water dispensers are required, we use reasonable endeavours to install mains supplied filtered water dispensers and avoid the use of bottled water and bottled water dispensers.

5.5 AGENCY LABOUR & SITE SECURITY

Where agency staff, cleaners, site labour or site security personnel are engaged, supply chain companies must have appropriate systems and processes in place to ensure compliance with all UK employment legislation (including the National Minimum Wage, the Agency Worker Regulations 2011 and the Asylum and Immigration Act 2006).

For the procurement of security services, we will seek to use companies approved by the Security Industry Authority (SIA) which is the organisation responsible for regulating the private security industry. All security guard personnel on our projects must have a current SIA licence.