

# **SUSTAINABLE PROCUREMENT POLICY**

**August 2017**

**Willmott Dixon Holdings**



**WILLMOTT DIXON**

**SINCE 1852**

**2017 SUSTAINABLE PROCUREMENT POLICY**

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1 SCOPE OF THIS POLICY

This policy demonstrates the sustainable procurement requirements for Willmott Dixon Holdings, made up of Willmott Dixon Construction, Willmott Partnership Homes and Willmott Dixon Interiors as shown in our [company structure](#).

The policy applies to all procurement activities undertaken by or on behalf of Willmott Dixon and our supply chain partners, including designers, consultants, specifiers, trade contractors, product manufacturers and product distributors. It covers:

**Goods** – The 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.

The requirements set out in this Policy are categorised as:

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

**Preference** – We will procure with a preference for these requirements when all other aspects of delivery are equal.

**Where technically feasible** – Where project constraints allow the Willmott Dixon company and its supply chain must comply with these constraints.

## 2 SUMMARY OF SUPPLY CHAIN REQUIREMENTS

Below is a summary of the key supply chain requirements and preferences. Further detail can be found within sections.

PROCUREMENT ACTIVITY	CATEGORY	DESCRIPTION	MANDATORY	PREFERENCE	WHERE TECHNICALLY FEASIBLE
<b>GOODS</b>					
<b>CONSTRUCTION PRODUCTS</b>	<b>ALL GOODS SUPPLY CHAIN PARTNERS</b>	Have a full and relevant environmental policy	X		
		Provide technical and transparent evidence to support any performance related product claims when requested. <b>New transparency requirement added</b>	X		
		Adhere to the provisions of the <a href="#">UN Global Compact principles</a> .	X		
		Collaborate with Willmott Dixon e.g. share best practice, new products & innovation. <b>Amended to include collaboration and made mandatory</b>	X		
		Comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy. <b>New</b>	X		
		Ensure that all materials and substances used comply with relevant legislation.	X		
		Have, or demonstrate a commitment to securing, a fully accredited environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body <b>Added 'demonstrate a commitment to securing'</b>		X	
		Products to comply with a recognised scheme for responsible sourcing of materials such as BES 6001 or BS 8902		X	
		Product manufacturers to have, or be working towards BS EN 15804 compliant Environmental Product Declarations (EPDs)		X	
		Provide lifecycle costing information to inform product selection e.g. associated maintenance and <b>deconstruction costs over 30 year building life. New</b>		X	
	Be an active member of the Supply Chain Sustainability School i.e. bronze, silver or gold. <b>Added bronze, silver, gold</b>		X		
	Provide locally sourced goods where possible <b>New</b>		X		
	<b>FINISHES &amp; SEALANTS</b>	No paints or other finishes to contain lead	X		
		High VOC paints, finishes and sealants should be designed out or low and zero VOC alternatives selected where technically feasible e.g. water based instead of solvent based paint for external walls. <b>Finishes included and an example added</b>			X
	<b>INSULATION</b>	The Global Warming Potential (GWP) of insulants to be less than 5	X		
	<b>TIMBER &amp; TIMBER PRODUCTS</b>	All fixed timber & temporary timber must be from legal and sustainable sources (PEFC or FSC), accompanied by Chain of Custody information and evidence of this issued to the Willmott Dixon Company	X		
		All supply chain members providing timber must be able to evidence compliance with obligations of the EU Timber Regulation (EUTR) when required.	X		
When suitable products are available, procure timber which is assured as 'Grown in Britain'.			X		
	Avoid products with added urea formaldehyde <b>New</b>		X		

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PROCUREMENT ACTIVITY	CATEGORY	DESCRIPTION	MANDATORY	PREFERENCE	WHERE TECHNICALLY FEASIBLE	
	NATURAL STONE	Procure natural dimensional stone from suppliers demonstrating leadership in the ethical stewardship of their supply chain.		X		
	POLYVINYL CHLORIDE (PVC) PRODUCTS	PVC manufacturers must have phased out, or be working towards and reporting on the phasing out of, heavy metals	X			
		Either operate a take-back scheme that offers a closed-loop recycling system or identify a mechanical recycling system for unbonded installation waste. <b>Changed to 'unbonded installation waste'</b>	X			
		All chemicals used in manufacture of PVC to be registered under REACH	X			
		Procure PVC products with recycled content (unless specifically precluded by third-party performance requirements such as BBA). <b>Added caveat on third-party performance requirements</b>		X		
		Provide alternatives to, or design out the use of, PVC products containing Phthalates. <b>New</b>		X		
	PACKAGING	All supply chain partners must apply the waste hierarchy to packaging.	X			
		Use of larger pack sizes to reduce the amount of packaging per unit		X		
		Use cardboard wrapping where appropriate instead of plastic wrapping i.e. bubble wrap		X		
		Suppliers to collect and reuse packaging as many times as possible		X		
		Supply products that are available in concentrated forms		X		
		Promote the use of manufacturer branded pallets		X		
		Polystyrene packaging should be avoided		X		
	SETTING UP OUR SITES	PLANT & EQUIPMENT	Site plant or equipment including generators to be no more than 18 months old		X	
			Site lighting to use LEDs <b>New</b>		X	
			Non-road diesel engines should be Stage IIIA compliant (unless local standards stipulate more stringent requirements e.g. London Low Emissions Zone). <b>Amended to stipulate Stage IIIA and made mandatory</b>	X		
SITE ACCOMMODATION		Temporary accommodation units must comply with the Willmott Dixon requirements on energy and water saving measures. E.g. cabin zoning and sub-metering. <b>Examples added</b>	X			
		Hand towels are not to be provided where hand dryers are installed	X			
		All white goods provided must be a minimum of A-rated	X			
OFFICE CONSUMABLES	PAPER PRODUCTS	Paper must be sourced under a certified forest management scheme	X			
		Paper must be: elemental chlorine-free (ECF), processed chlorine-free (PCF) or total chlorine-free (TCF) <b>Changed from 'and' to 'or'</b>	X			
		External publications to use standard paper sizes, uncoated paper stock is preferred		X		
		Vegetable oil ink should be specified for external publications		X		
		Minimise the use of printed media and publications		X		
		Paper should minimise the use of virgin fibre and contain a minimum of 50% recycled fibre.		X		
	INFORMATION TECHNOLOGY	Photocopiers and networked printers (excluding wide format printers) to be capable of double-sided printing and secure print.	X			

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PROCUREMENT ACTIVITY	CATEGORY	DESCRIPTION	MANDATORY	PREFERENCE	WHERE TECHNICALLY FEASIBLE
		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		
		Information on the full life-cycle performance of a product must be made available by the supplier so it can be considered during procurement	X		
	CATERING	All tea and coffee to be either Fairtrade or Rainforest Alliance certified	X		
		Supply chain caterers to select food using Fairtrade produce, locally sourced and food currently in season.		X	
		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.			X
TRANSPORT	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		
		Telematics systems should be fitted to all vehicles used by Willmott Dixon to allow effective route planning and reduce unnecessary mileage.	X		
<b>WORKS</b>					
WORKS SUPPLY CHAIN PARTNERS	LABOUR AND TRADE	To have a full and relevant environmental policy	X		
		Comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy. <b>New</b>	X		
		Comply with all UK employment legislation and ensure that workers have the right to work in the UK.	X		
		Maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested.	X		
		Supply chain partners to minimise construction waste arisings wherever possible. <b>New</b>	X		
		Collaborate with Willmott Dixon to ensure continuous development and improvement. <b>Mandatory requirement</b>	X		
		To have, or be committed to securing, a fully accredited environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body. <b>Added commitment to secure requirement and made a mandatory item</b>		X	
		Be active members of the Supply Chain Sustainability School i.e. bronze, silver or gold.		X	
		Promote, create and manage apprenticeship opportunities and/or training and development of site operatives. <b>Amended to include creating opportunities</b>		X	
Engage local labour and provide opportunities for small and medium sized enterprises. <b>New</b>		X			
<b>SERVICES</b>					
PROFESSIONAL SERVICES	ALL SERVICE PROVIDERS	All providers of professional services and their employees to comply with the principles and objectives set out within our procurement policy.	X		
		Comply with the requirements of the Modern Slavery Act and Willmott Dixon's Modern Slavery Policy. <b>New</b>	X		
		All personnel and key stakeholders involved with have the necessary skills, knowledge and experience, and provide evidence if requested.	X		

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PROCUREMENT ACTIVITY	CATEGORY	DESCRIPTION	MANDATORY	PREFERENCE	WHERE TECHNICALLY FEASIBLE
WASTE & RECYCLING	WASTE MANAGEMENT CONTRACTORS	Waste service providers must demonstrate a minimum diversion from landfill of 95% for construction waste, unless agreed with the Group Environment Manager	X		
		Procure waste services from providers who are accredited to PAS 402, or have committed to working toward accreditation with a clear timeframe. <b>Amended to include a commitment to secure accreditation.</b>		X	
AGENCY & SECURITY STAFF	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, the Asylum and Immigration Act 2006 and the Modern Slavery Act 2016). They must also comply with Willmott Dixon's Modern Slavery Policy. <b>Modern Slavery Act &amp; Policy included</b>	X		
		Use security services from companies approved by the Security Industry Authority (SIA)	X		
		All security guard personnel on our projects to have a current SIA licence	X		
		Engage local labour and provide opportunities for small and medium sized enterprises. <b>New</b>		X	

### **3 GOODS**

#### **3.1 CONSTRUCTION PRODUCTS**

##### **3.1.1 ALL GOODS SUPPLY CHAIN PARTNERS**

Companies who manufacture, fabricate, assemble goods or distribute them must:

- have a full and relevant environmental policy
- provide technical and transparent evidence to support performance related product claims when requested
- adhere to the provisions of the [UN Global Compact principles](#)
- collaborate with Willmott Dixon e.g. share best practice, new products & innovation
- comply with the requirements of the Modern Slavery Act & Willmott Dixon's Modern Slavery Policy
- ensure that all materials and substances used comply with relevant legislation

Preference will be given to those who go beyond our mandatory requirements and:

- have, or demonstrate a commitment to securing<sup>1</sup>, a fully accredited environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body
- provide products with a recognised responsible sourcing scheme. 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
- are active members of the Supply Chain Sustainability School i.e. bronze, silver or gold.

Lifecycle costing information should also be provided where possible to inform product selection e.g. associated maintenance and deconstruction costs over 30 year building life.

Products that have, or are working towards adoption of, BS EN 15804 compliant EPDs (Environmental Product Declarations) will be given preference over equivalent ones without.

We will also procure with a preference for locally sourced goods and provide opportunities to small and medium sized enterprises as well as the voluntary sector where possible. Ensuring we invest in the communities we are working in and reduce the emissions associated with vehicle movements to our sites. Where our supply chain partners are procuring on our behalf we also expect them to procure with the same preferences.

##### **3.1.2 FINISHES & SEALANTS**

Long-term exposure to VOCs can have a serious negative effect on human health. These chemicals can be found in paints, sealants, glues and internal finishes. To limit the impact of materials containing VOCs, we will directly, and through our supply chain:

- not use paints or other finishes containing lead
- use low or zero-VOC paints, finishes and sealants (e.g. water based in place of solvent based paint) where technically feasible
- design out the use of high-VOC products by selecting alternative materials and finishes where technically feasible and appropriate

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<sup>1</sup> With a clear timeline



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### 3.1.3 INSULATION

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

### 3.1.4 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). There are two types of evidence required to prove the legality and sustainability of timber and timber products:

- 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.
- 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. We also recognise timber traceable to a forest with a fully implemented forest management plan in line with the UK Forestry Standard (UKFS).

In support of the above requirements our supply chain partners must provide a Chain of Custody certificate and delivery notes quoting the Chain of Custody reference from the certificate for that delivery.

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) when required.

Where possible we also have a preference for products with no added urea formaldehyde.

### 3.1.5 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](#).

### 3.1.6 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 manufacturers must be able to demonstrate that waste produced during the manufacturing process is recycled

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- 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 unbonded installation waste

Willmott Dixon also has a preference for PVC products with recycled content (unless specifically precluded by third-party performance requirements such as BBA). We also expect our suppliers to provide alternatives to, or design out the use of, PVC products containing Phthalates where possible.

### 3.1.7 PACKAGING

Willmott Dixon is committed to reducing waste. We will engage with our supply chain partners to jointly develop strategies to reduce packaging on our projects. As a minimum we require our supply chain to minimise packaging waste by implementing the waste hierarchy and sharing best practice with us.

The actions listed below are considered best practice and where other factors (cost, quality, protection etc) are equal Willmott Dixon will procure with a preference for products where these actions have been implemented:

- 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 e.g. bubble wrap
- supply 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

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

## 3.2 SETTING UP OUR SITES

### 3.2.1 PLANT & EQUIPMENT

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. Non-road diesel engines should be Stage IIIA compliant (unless local standards stipulate more stringent requirements e.g. London Low Emissions Zone) as this plant is cleaner, 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, CO<sub>2</sub> and NO<sub>x</sub> emissions from engines.

Temporary lighting systems should use LEDs where cost neutral or beneficial.

As part of our commitment to reducing emissions on our sites powered by diesel generators (e.g. linked to site cabins and/or lighting) we will assess whether a 'hybrid battery unit' is suitable and procure where viable.

### 3.2.2 SITE ACCOMODATION

Temporary accommodation units provided by Willmott Dixon must comply with the current Group requirements on energy and water saving measures. This includes but is not limited to cabin zoning and sub-metering.

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Hand towels are not to be provided where hand dryers are installed.

All white goods provided must be a minimum of A-rated under the EU Energy Efficiency Labelling Scheme.

### 3.3 OFFICE CONSUMABLES

The following section relates to office consumables procured by the Willmott Dixon family of companies.

#### 3.3.1 PAPER PRODUCTS

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 elemental chlorine free, processed chlorine free or total chlorine free including oxidising and reductive bleaching. Printed publications must utilise standard paper sizes to minimise waste. Uncoated stock is preferred and vegetable oil ink should be specified where possible with the environmental impact of specialist finishes carefully considered.

### 3.4 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

### 3.5 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.

### 3.6 TRANSPORT

#### 3.6.1 COMMERCIAL VEHICLES

All commercial vehicles procured by, or on behalf of, Willmott Dixon Holdings must comply with the latest European engine emission standards, and be fitted with speed

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restrictors. Tyre pressure monitoring systems (TPMS) should be specified, if not fitted as standard, and vehicles must be supplied with manual tyre pressure gauges.

Telematics systems should be fitted to all vehicles to allow effective route planning and reduce unnecessary mileage.

In collaboration with our supply chain Willmott Dixon will also consider the following measures; GPS trackers, engine remapping for improved efficiency, low rolling resistance tyres and the use of electric/hybrid vehicles.

**3.6.2 COMPANY CARS**

Willmott Dixon has group policies to reduce CO<sub>2</sub> emissions, distances travelled and to procure a more efficient fleet. 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 CO<sub>2</sub>e.

## 4 WORKS

### 4.1 WORKS SUPPLY CHAIN PARTNERS

All works supply chain partners must:

- have a full and relevant environmental policy,
- comply with all UK employment legislation including the Modern Slavery Act & Willmott Dixon's Modern Slavery Policy
- maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested
- minimise construction waste on all projects

Willmott Dixon has processes in place to foster collaboration with its supply chain partners to identify best practice and innovative solutions which all supply chain partners must support and engage with to demonstrate continuous development.

Willmott Dixon evaluates trade partners through the use of [Builder's Profile](#) and procures works with a preference for those who:

- are receptive to the promotion, creation and management of apprenticeship opportunities and/or training and development of site operatives
- are active members of the Supply Chain Sustainability School i.e. bronze, silver or gold.
- have secured, or have committed to securing, 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

We will also procure with a preference for locally based labour and supply chain partners, and provide opportunities to small and medium sized enterprises as well as the voluntary sector and social enterprises where possible. Where our supply chain partners are procuring on our behalf we also expect them to procure with the same preferences.

## **5 SERVICES**

### **5.1 PROFESSIONAL SERVICES**

We rely on our design and consultant supply chain partners to help deliver sustainable procurement and sustainable development. All providers and their people who create designs 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. They must also adhere to the requirements of the Modern Slavery Act & Willmott Dixon's Modern Slavery Policy.

We will also procure with a preference for local services and provide opportunities to small and medium sized enterprises where possible. Where our supply chain partners are procuring on our behalf we also expect them to procure with the same preferences.

### **5.2 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 95% for mixed construction waste, unless agreed with the Group Environment Manager. Works supply chain partners employing their own waste contractors to remove waste material from our projects must operate to the same standard.

Preference will be given to those waste service providers who are accredited to, or have committed to achieving accreditation to, PAS 402 with a clear timeframe.

### **5.3 AGENCY & SECURITY STAFF**

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, the Asylum and Immigration Act 2006 and the Modern Slavery Act 2016) they must also comply with Willmott Dixon's Modern Slavery Policy.

For the procurement of security services, we will only 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.

We will also procure with a preference for locally sourced labour and provide opportunities to small and medium sized enterprises where possible to ensure we invest in the communities we are working in. Where our supply chain partners are procuring on our behalf we also expect them to procure with the same preferences.

### **5.4 ENERGY SUPPLY**

Willmott Dixon has appointed an energy consultant partner 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.

Willmott Dixon will also consider green energy tariffs where responsible for energy procurement

**5.5 TEMPORARY & FIXED OFFICES**

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 green memorandum of understanding (MoU) with our landlords, covering energy and environmental issues. 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/CO<sub>2</sub> 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