

SUSTAINABLE PROCUREMENT POLICY

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1 Introduction

This document sets out the Blenheim House Construction approach to sustainable procurement. It acts as guidance for both internal buyers and specifiers and for current and prospective suppliers.

Sustainable procurement is defined by Blenheim House Construction as 'taking into account environmental, social and ethical aspects of our projects while meeting our customer requirements'. Blenheim House Construction see this as essential and efficient business practice, which helps us to make properly informed and balanced decisions when procuring the products and services needed for our projects.

This policy covers the provision of materials, products, equipment, works or other services. Blenheim House Construction's preference is always to do business with responsible suppliers who recognise their responsibility to protect the environment and foster good relations with their employees and local communities.

Blenheim House Construction's key responsibility is to develop and maintain an economically sound and prosperous business while acknowledging our responsibilities towards the communities and environments in which we operate, and towards our employees, business partners and society in general. The key foundations for our performance can be summarised thus:

- We are committed to do business with a high degree of integrity and ethics.
- We comply with all relevant legal requirements.
- We recognise our responsibilities toward our employees and the communities in which we operate.
- We are open-minded in dialogue with those who are affected by our operations and communicate with affected parties in a timely and effective manner.

2 Sustainability Procurement Statement

Blenheim House Construction is committed to protecting the environment throughout all our business operations to ensure we reduce our impact on natural resources. We will actively manage the use of materials and wherever possible employ methods, systems and products to reduce our impact on the environment. In particular we will:

- Educate our employees and subcontractors to ensure they are aware of our environmental commitment and they understand their environmental responsibilities
- Actively encourage employees and subcontractors to suggest environmental improvement initiatives
- Recycle waste materials where possible both on sites and in offices
- Use timber from sustainable and managed forests
- Liaise with the local community and minimise disturbance to our neighbours from our site activities
- Use biodegradable chemicals in cleaning operations and minimise the use of solvents
- Utilise methods to reduce our consumption of water and energy
- Efficiently manage delivery and transportation of materials, people and equipment
- Actively assist consultants, designers, subcontractors and Clients to select and use systems which reduce the impact of the whole project on the environment
- Use insulation materials produced using non-ozone depleting gases in their manufacture
- Use environmentally friendly refrigerant systems
- Employ an Environmental Management Plan for each of our projects and undertake a specific review of the possible impacts and opportunities.

We will comply with the requirements of environmental legislation and approved codes of practice and continuously seek to improve our environmental performance.

We will review this policy on an annual basis or where operations significantly change.

The guiding principles which underlie sustainability are an intrinsic part of Blenheim House Construction business operations. The company is committed to working together to manage resources in a way which has a positive influence on the natural environment and the communities in which we operate.

Blenheim House Construction aims to deliver a sustainable built environment through a strong management structure underpinned by a collaborative approach to business which forges and maintains enduring long-term relationships with our staff, clients, consultants, supply chain and the communities in which we work.

Blenheim House Construction will work towards achieving the following Sustainability commitments:

- Resource Management: To responsibly source and efficiently manage natural resources.
- Working Together: To strengthen relationships with our stakeholders and staff
- Natural Environment: To protect and enhance the natural environment.
- Community: To promote opportunities, benefits and inward investment to local communities

The Environmental Manager is responsible for reviewing on an annual basis this Policy and the Company's sustainability commitments and targets, in order to achieve continual improvement, and reports to the Managing Director. All personnel within the Company have a responsibility for delivering sustainability through the performance of their duties.

Wherever possible sustainable products and services shall be sourced locally from suppliers / producers / providers. Whether purchasing directly or indirectly, Blenheim House Construction requires suppliers, subcontractors and consultants to manage the social, environmental and economic impacts of their operations. Where such organisations may not initially meet all our requirements, we shall work with the supply chain to develop their business practices. Blenheim House Construction does however expect the supply chain to be working towards compliance with this document and the company policies.

3 Key Principles

We expect our suppliers to adopt, and further develop, practices that are environmentally sound, socially responsible and ethical.

We will always provide a safe and healthy working environment and pay promptly within agreed terms. We will reward excellent supplier performance through repeat business opportunities and help develop mutually beneficial long-term relationships. We will also give our supply chain the space and flexibility to develop and deliver innovative solutions.

4 Environmental Management

We require our suppliers to work actively to prevent environmental harm, minimize environmental impact and provide innovative green solutions. They should prioritise efforts to limit the environmental impact of their business operations and have in place effective environmental management systems that are appropriate for the nature and scale of their business and services provided.

The biggest opportunities to lower environmental impacts lie in the efficient and careful use of natural resources, requiring careful consideration of the materials used, lowering carbon emissions, and using less and cleaner energy.

5 Materials & Products

5.1 Ethical Sourcing of Materials and Products

We ask suppliers and their subsidiaries or sub-contractors to make every effort to act in accordance with our Code of Conduct in the performance of any agreement. Wherever possible, all products and services supplied will have been sourced and/or produced in compliance with all applicable laws and regulations throughout the entire supply chain. Wherever possible, there will be full transparency on the origin of products and materials, including all stages of extraction, manufacturing and distribution and the identity of all parties in the supply chain.

We expect our suppliers to be aware of and promote materials with reduced environmental impacts and be able to provide declarations on the embodied impacts of their products, by reference to bespoke Environmental Product Declarations (EPD) or documents such as the BRE Green Guide to Specification.

Blenheim House Construction expects all manufacturers and suppliers to be working towards adoption of BS EN 15804 compliant EPD for their full range of products and materials. These tools help with material selection and we expect suppliers to be able to offer us lower impact alternatives where available. Suppliers shall keep details on the substances and materials associated with products and services supplied.

Blenheim House Construction will seek to procure products that have been certified as ethically sourced, such as those certified by a member of Fairtrade Labelling Organizations International (FLO) or the Rainforest Alliance, or other equivalent standards, where they represent value for money and do not compromise other sustainability objectives.

Blenheim House Construction shall give preference to those suppliers and subcontractors that can demonstrate responsibly sourced construction products.

We recognise that the responsible sourcing schemes are in their infancy and will support the supply chain and suppliers where applicable to seek certification to the above schemes.

5.2 Construction Products and Materials

For companies which manufacture, fabricate or assemble goods, preference will be given to those who can demonstrate they procure from suppliers who are able to demonstrate compliance with a recognised responsible sourcing scheme, certified by a third party. Suppliers must provide documentary evidence in the form of certificates, delivery notes and invoices to confirm compliance. The two methods currently available for demonstrating responsible sourcing in the UK are:

- Certification to the BRE BES 6001 Framework standard for Responsible Sourcing of Construction Products, including compliant schemes like Eco-Reinforcement (suppliers are encouraged to achieve at least a Very Good rating);
- Membership of a sector specific scheme that complies to BS 8902, verified by a third party.

The scope of this policy extends to all products and materials. In the absence of certification to either of these schemes Blenheim House Construction will require other evidence of responsible sourcing as defined by BREEAM where projects are seeking this accreditations.

Where they represent value for money and do not compromise other sustainability objectives, encouragement will be given to suppliers who are able to demonstrate that materials employed in their works or finished products are sourced from within as close a proximity to the final location or destination as possible.

Blenheim House Construction take every opportunity to substitute materials that can potentially be harmful to health and the wider environment.

5.2.1 Healthy Materials

Blenheim House Construction is committed to proactively selecting and using, where possible, materials that are not deleterious to people and the environment. Suppliers are encouraged to use non-polluting and non-toxic materials and substances in the products and services they supply.

We recognise that through the conscious selection of healthy materials we can limit the impact on the environment and those people within it.

For Blenheim House Construction compliance with the term healthy materials means:

- Compliance with the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) and other relevant Regulations.
- The use of coatings with low or no Volatile Organic Compound (VOC) content

We will ask our supply chain to demonstrate compliance with the above requirements and where practicable seek to use non-harmful substances. Evidence requested may include copies of material safety data sheets, COSHH assessments and technical information on products.

All materials and substances must comply with relevant legislation.

Low and VOC-free products and materials are preferred.

5.2.2 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, Blenheim House Construction will directly, and through our supply chain:

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

5.2.3 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.

5.2.4 Heavy Metals and Brominated Fire Retardants

As far as is reasonably practicable, the concentrations of heavy metals and brominated fire retardants in products and packaging will be minimised. The levels of such materials in electrical and electronic equipment are controlled by the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2006 (as amended). The level of certain heavy metals in packaging is controlled by the Packaging (Essential Requirements) Regulations 2003 (as amended). The total content of the heavy metals Cadmium, Hexavalent Chromium, Lead and Mercury in packaging or in any packaging components must not exceed 100ppm.

5.2.5 Timber & Timber Products

All timber products used in any way on Blenheim House Construction sites must be certified as legally and sustainably sourced, as defined by the UK Government Central Point of Expertise on Timber (CPET). CPET currently approves two certification schemes as providing evidence of legal and sustainable sourcing - the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Suppliers must provide Chain of Custody (CoC) evidence, including certificates, delivery notes and invoices to confirm compliance with this requirement. FSC is the preferred scheme, particularly for tropical timber and timber originating from high risk areas.

To help us ensure we are working to best practices Blenheim House Construction is a member of Trada.

5.2.6 Natural Stone

Blenheim House Construction 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.

5.2.7 Refrigerants

Suppliers should prioritise products that have minimal global warming potential (GWP). Where other safe, technically feasible, cost effective, energy efficient and more environmentally acceptable alternatives exist, hydrofluorocarbons (HFCs) should be avoided. As a guide, suppliers should target refrigerants with a GWP of less than 10 and insulation materials with a GWP of less than 5. Both should have zero ozone depleting potential (ODP).

5.2.8 Paper, Printing & Publications

Blenheim House Construction minimises the use of printed media through larger screens and where appropriate will always consider the use of electronic publications. However, where this is not possible, 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.

Wherever possible, only recycled paper should be used and all paper should be chlorine free.

5.2.9 Packaging

Blenheim House Construction 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 produces 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

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

5.2.10 Use of Recycled and Secondary Materials

Wherever viable suppliers shall reuse materials and look to maximise the use of recycled or secondary content in products and packaging. Where applicable, they shall provide Blenheim House Construction with evidence of recycled content alternatives and retain information on the recycled content associated with products and packaging supplied.

6 Waste & Recycling

Where practicable, all products supplied will be capable of being reused, recycled or recovered. Evidence on waste reducing actions and other opportunities to reduce waste should be retained for reference. Suppliers will comply with the project's Site Waste Management Plan (SWMP) and where required contribute to its development.

Where our supply chain is responsible for the movement and treatment of waste, Blenheim House Construction requires the following information before any waste is removed from site;

- Waste Carrier's Registration Licence
- Waste Management Licence/ Permit/Exemption relevant for all waste management operations
- Testing Certificates for all skips to be lifted (if applicable)
- Specimen waste transfer notes (consignment notes for hazardous waste) to be used
- Specimen monthly waste reports

Where practicable, Blenheim House Construction expects waste streams to be segregated at source to assist the movement and treatment of waste. Waste transfer notes and hazardous waste consignment notes must be correctly completed and retained for all waste movements in compliance with waste regulations.

As part of our SWMPs we require our suppliers and subcontractors to provide monthly waste reports, identifying the waste streams and tonnages, treatment type and tonnes of waste diverted from landfill/landfilled. This can be uploaded to the 'SmartWaste' site by all; suppliers/contractors.

We may undertake waste audits on our suppliers and subcontractors at any time or alternatively ask for copies of waste transfer notes or consignment notes for our records.

7 Contribution to Site Waste Management Plans (SWMPs)

Waste Elimination/Reduction:

All Blenheim House Construction projects and premises complete a SWMP. In completing the SWMP our subcontractors are required, before starting on site, to demonstrate:

- Measures to design out waste have been considered and implemented
- Measures to eliminate packaging have been considered and implemented where possible
- Waste forecasts have been completed which identify each individual waste stream, volume of waste predicted and disposal route and provide commentary as to why the disposal route has been chosen.

This information may be requested at tender stage and Blenheim House Construction will look favourably on those who can clearly demonstrate compliance as well as the proactive elimination of waste through the design and construction process.

8 Carbon

Our objective is to manage and reduce our overall carbon footprint and we expect suppliers to understand and measure both the embodied carbon in the products and materials they supply and the carbon associated with the activities they carry out on site.

Suppliers should note the most significant and cost-effective opportunities to reduce carbon emissions associated with a project to add value to their tender, providing supporting evidence as appropriate. Suppliers should also ensure that they obtain all relevant documents relating to the embodied carbon of the products and services provided, either in the form of an LCA, Environmental Product Declaration (EPD) or carbon analysis and provide any relevant data so that we can assess the impact of the product or service.

9 Transport

Blenheim House Construction encourages suppliers to use low emission transport modes wherever feasible. Suppliers should aim to optimise transport efficiency and minimise transport distances through effective planning and driver training.

We may require our supply chain to provide records of actions taken to reduce transport impacts on our projects. When necessary, we may ask our supply chain to justify the selection of specific modes of transport to ensure that the most sustainable options are utilised. We expect any transport movements to be planned to ensure the most efficient routes are selected and would proactively encourage sourcing locally to minimise transportation.

10 Mechanical Site Plant

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. We encourage our supply chain to do the same.

11 Renewable Fuels

Blenheim House Construction encourages the use of electric vehicles, biogas and sustainably produced biodiesel. Suppliers are discouraged from using biodiesel containing palm oil unless it is sustainably produced and distributed, for example by reference to the certifications scheme developed by the Roundtable on Sustainable Palm Oil (RSPO) (www.rspo.org).

12 Energy

Wherever relevant, suppliers should seek to fully exploit opportunities for resource and energy optimisation and efficiency. The supply chain is encouraged to use clean and low energy sources wherever reasonably

practicable, for example by supplying products rated in accordance with EU Energy Label Class A + and ++, Energy Saving Recommended (ESR) endorsed, or those compliant with other recognised equivalent standards.

13 Water

Suppliers will be required to support Blenheim House Construction in its commitment to minimising water wastage. We will work with our supply chain to reduce water consumption on our projects where possible by:

- Measuring water consumption
- Improving water efficiency
- Rainwater harvesting
- Grey water recycling
- Avoiding water intensive activities

Suppliers should identify the most significant and cost-effective opportunities to reduce water consumption to and should also be working towards understanding and minimising the embodied water content of the products and materials they supply.

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.

14 Information Technology

Blenheim House Construction 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
- The procurement and use of stand-alone desktop printers are to be discouraged where larger Multi-Functional Devices (MFDs) exist
- Devices shall be switch off when not in use, except for equipment that needs to run all the time, such as servers

Any business that manufactures, rebrands and sells, or imports electrical or electronic equipment has obligations under the Waste Electrical and Electronic Equipment Regulations (WEEE). Where electrical or electronic equipment or components are supplied, the supplier shall be responsible for determining the extent to which the Regulations apply and comply at their expense. Where required they will take back such items when they are no longer required by Blenheim House Construction for subsequent reuse, recycling, or recovery.

Electrical items and electronic equipment will also need to comply with the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations.

15 Subcontractors

Blenheim House Construction has processes in place to ensure collaboration and integration for best practice and to deliver innovative solutions. Blenheim House Construction will evaluate trade contractors 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

- 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

16 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.

17 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).

In line with our local procurement policy, we aim to recruit agency and site security locally wherever possible.

18 Ethical Breaches

All suppliers are required to ensure that no ethical breaches occur by preventing any forms of corruption, and comply with any applicable competition (anti-trust) laws. Suppliers will be required to demonstrate that they have procedures in place to deal with the risks of bribery in their organisation in accordance with the Bribery Act 2010. We encourage suppliers to report any suspected major ethical breaches.