



RESPONSIBLE SOURCING POLICY STATEMENT

We the Directors of SDC recognise the impact we have on the environment and our stakeholders through design, construction and operational activities. We therefore act in a socially responsible manner through procurement and by working with our stakeholders to act fairly and treat other with respect.

Business Integrity

We are committed to ethical business practices in the way we interact with our stakeholders (employees, clients, business partners, and suppliers), government, regulators, society, and the environment. We will:

- Act with integrity in all our business activities.
- At all times be open, transparent and fair in our communication and dealings with our business partners, and will fulfil the payment terms and agreed contract conditions.
- Abide to our Corporate Responsibility Statement.

SDC operates a comprehensive environmental management system which complies with the requirements of all relevant UK and EU environmental legislation, the requirements of ISO 14001:2015 in order to define, measure and control the processes and activities that are employed in the implementation of the business.

Environmental

At SDC we are committed to a proactive approach to environmental issues and we take into account environmental impacts across our business and supply chain. We recognise the importance of working together with our clients and suppliers on sustainability issues. We will:

- Promote the application of 'whole life value' through the design and construction process to reduce the impact on the environment that the buildings life cycle will have.
- Consider the impact on natural resources when choosing goods and materials for our construction and office based activities.
- Minimise the use of materials with hazardous content wherever technically and commercially possible.
- Review specifications during the design and construction processes to reduce life cycle impacts.
- Ensure all timber and wood based products are sourced from legal and sustainable sources as defined by the UK Government Central Point of Expertise on Timber (CPET) (e.g. FSC (Forestry Stewardship Council), PEFC (Program for the Endorsement of Forest Certification), GiB (Grown in Britain), and delivered to site with full chain of custody.
- Insist that our subcontractors have an Environmental Policy and work to SDC's Environmental procedures to ensure compliance with all relevant environmental protection laws and regulations.

People

We invest in the recruitment, training, and development of our staff to ensure that we are able to meet our objectives as a sustainable business, enabling us to create working environments where they feel safe, engaged and valued. We require all of our suppliers to:

- Ensure that health and safety of anyone who could be affected by their activities is at the heart of their operations.
- Demonstrate that all employees and subcontractors have the necessary level of competences for all the tasks they are to undertake.



Local Procurement

We aim to support the local economy by locally sourcing materials, labour and services by:

- Promoting local procurement of materials, labour and services to our employees and supply chain.
- Working with our partners to provide training to employees of our supply chain to raise awareness of those aspects of our business which will have an impact on health, safety and the environment.
- Working actively with the local communities to build and maintain a positive impact and we also encourage our supply chain to do so too.

Implementation and Review

SDC ensure that their employees and the supply chain member adhere to our social responsibilities by:

- Disseminating this policy to all our supply chain partners
- Requesting information from our subcontractors on their social and environmental performance.
- Integrating our responsible requirements through our procedures, providing ongoing training and guidance to our employees.

The Scope of this policy

This document sets out SDC's approach to sustainable procurement, expanding on and supporting the principles outlined above. It acts as guidance for both internal buyers and specifiers and for current and prospective suppliers.

It covers

Goods – The physical materials from manufacturers and suppliers (including energy) that are purchased by SDC, 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.

GOODS

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 SDC and our supply chain,
- Can provide technical information to support performance related product claims upon request



Construction Product Distributors

We require distributors, merchants and hire companies to ensure that they comply fully with this policy. SDC 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.

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.

Global Warming Potential (GWP)

To reduce the contribution, we make to climate change, we encourage our supply chain to specify and use insulants with a GWP of less than 10.

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, SDC 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.

Timber & Timber Products

SDC 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).



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SDC 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.

Transport

SDC is working to reduce CO2 emissions, reducing distances travelled by sourcing (where feasible) from local suppliers. We endeavour to measure and monitor our project miles as we continue to progress our responsible sourcing policy.

Packaging

SDC is committed to reducing waste. We will endeavour to work with our supply chain to minimise the use of packaging, and encourage that any packaging is collected for re-use. Where this is not practical it should be recyclable.

Mechanical Site Plant

To reduce carbon emissions and fuel we will seek to utilise plant that is energy efficient, well maintained and cost-effective to run. We encourage our supply chain to do the same where feasible.

Temporary & Fixed Offices

SDC shall endeavour to provide temporary accommodation (where supplied by SDC) that is energy efficient and includes water saving measures in WC units.

SDC shall also encourage waste segregation within our temporary offices to allow for maximum recycling of waste, coordinating with other on-site subcontractors where possible to optimise the waste management strategy for the premises.

WORKS

Trade Contractors

SDC will evaluate trade contractors through the use of their 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,



SERVICES

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.

Information Technology

SDC 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.

Waste & Recycling

SDC 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 ambition to minimise waste to landfill, we only work with companies who can demonstrate a minimum diversion from landfill of 85% for mixed construction waste, unless agreed with the BPS 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.

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.



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Ref	Description	Mandatory	Preference	Where Technically Feasible
Construction Product Manufactures				
	To have a full and relevant environmental policy		x	
	To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body.		x	
	Responsible sourcing of materials to BES 6001, BS 8902		x	
	Product manufacturers to have, or be working towards BS EN 15804 compliant EPD		x	
	Share best practice, new products & innovation with SDC & our supply chain		x	
	Provide technical information to support any performance related product claims when requested	x		
Construction product distribution.				
	To have a full and relevant environmental policy		x	
	To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body.		x	
Volatile Organic Compounds				
	Use of low or zero VOC paints and sealants (To be either preference or mandatory for BREEAM projects)			x
	Design out the use of high VOC products			x
	Ensure that all materials and substances used comply with relevant legislation	x		
	No paints or other finishes to contain lead	x		
Timber and Timber Products				
	All fixed timber & temporary timber to be from legal and sustainable sources (PEFC or FSC)	x		
	Preference for timber which is assured as 'Grown in Britain'		x	
	All supply chain members providing timber must be able to evidence compliance with obligations of the EU Timber Regulation (EUTR) if required.	x		
Transport				
	Measure and monitor project miles		x	
Trade Contractors				
	Demonstrate continuous development and improvement		x	
	To have a full and relevant environmental policy		x	
	To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body.		x	
	Maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested.	x		
	To be receptive to the promotion and management of apprenticeship opportunities and/or training and development of site operatives.		x	



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	Comply with all UK employment legislation and ensure that workers have the right to work in the UK	x		
Professional Services				
	All providers of professional services and their employees to comply with the principles and objectives set out within our procurement policy.	x		
	All personnel and key stakeholders involved with have the necessary skills, knowledge and experience, and provide evidence if requested.	x		
Information Technology				
	Photocopiers and networked printers (excluding wide format printers) to be capable of double-sided printing and secure print	x		
	The procurement and use of stand-alone desktop printers is to be discouraged where larger Multi-Function Devices (MFD's) exist.		x	
	Products to be rated low energy consumption as recognised by Energy Star or similar	x		
	Must include built-in power management features	x		
	The full life-cycle performance of a product to be considered during procurement		x	
	Equipment manufacturers to have a managed asset recovery service to take back and recycle equipment	x		
Waste Recycling				
	Waste service providers must demonstrate a minimum diversion from landfill of 85% for construction waste, unless agreed with the BPS Manager	x		
	Waste service providers encouraged to report in accordance with PAS 402		x	
Agency Labour and 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).	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		



RESPONSIBLE SOURCING POLICY STATEMENT

Signed

F Shiner – Managing Director

Signed

G L Wykes – Director

Signed

M Lowndes – Director

Signed

C Millar – Director

Signed

A Knaggs – Director

Date: **March 2019**

Next Review Date: **March 2020**