

SUSTAINABLE PROCUREMENT POLICY

The image shows a large, modern industrial building with a grey metal facade and a dark blue horizontal stripe near the roof. A row of ten loading docks with blue doors is visible. The text "SUSTAINABLE PROCUREMENT POLICY" is overlaid in white, bold, sans-serif font across the middle of the building. The foreground is a wide, light-colored concrete area with metal bollards in front of each dock. The sky is blue with some clouds.

Scope of this policy

This policy is intended to show how Tungsten Properties commits to deliver sustainability through its procurement activities relating to **materials**, **works** and **services** being provided.

Procurement has a significant impact on our performance as a business and it is vital that we effectively manage the social, environmental and economic impacts equitably.

The implementation of the policy also applies to our supply chain partners including the design team, main contractor, sub-contractors, manufacturers and suppliers.

Materials – The procurement of materials from manufacturers and suppliers that are purchased by the Tungsten Properties and its appointed contractors, either directly or on their behalf.

Works – The procurement of labour and associated contractors that enable our projects.

Services – The procurement of professional skills and expertise including designers and consultants.

Part 1 of the policy details the organisation level aims & objectives and strategic targets that guide overall procurement activities. It provides details of duties for all those involved within the organisation and what is expected of the supply chain

Part 2 of the policy details a project specific framework for sustainable procurement and has been developed at project feasibility stages (RIBA Stage 1). It list specific requirement expected of the supply chain and how they need to be implemented at project level.

"WE RECOGNISE THAT WITH THE DEVELOPMENT OF REAL ESTATE COMES A RESPONSIBILITY TO DELIVER ENVIRONMENTAL AND SOCIAL BENEFITS TO OUR OCCUPIERS, THEIR WORKFORCE AND LOCAL COMMUNITIES IN WHICH WE OPERATE."

Part 1

Organisation level

Aims & Objectives

Tungsten Properties prides itself on three values of **WE LISTEN**, **WE CREATE** and **WE GO BEYOND**. Aligning with these core values our sustainable procurement core aims and objectives are to:

- minimise our environmental impact through better selection of materials
- reduce energy used during manufacturing, delivery and construction of our projects
- foster innovation in our supply chain to increase effectiveness of sustainable solutions that meet our organizational requirements
- encourage our supply chain to adopt best practice that minimises environmental impact and deliver community benefits
- work alongside our supply chain to achieve common goals and continually improve performance
- work with our supply chain to achieve zero safety incidents on all projects that we deliver
- be ethical in our business practices in dealing with our supply chain

WE LISTEN

Above all, we work to understand our investors, our communities, our local councils, our architects, our planners, our contractors, our agents and our occupiers.

It's about collaborating from the start, and that starts with listening and understanding.

We build buildings and we create spaces that work.

We listen to the market. And because we aren't corporate, we can respond quickly. We have a little black book of trusted suppliers with whom we have worked for years, meaning that we get the job done.

Circular Economy

Consumption and use of natural resources has generally followed a linear approach. Materials are sourced, used and finally disposed of as waste. The construction sector is a major consumer of natural resources yet the catalyst to change from a linear approach is slow coming. The circular economy concept offers a chance to make the step change needed whilst 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.

WE GO BEYOND

Ultimately, we deliver. But to get there, we tightly project manage the whole process by communicating, working collaboratively and managing expectations.

Exceeding expectations is what gives us the edge. We are nimble and efficient, and clients tell us that they enjoy working with us.

WE CREATE



Our 'big box' units contain the following features as standard:

- **Carbon neutral** – units which result in no net release of CO₂ into the atmosphere
- **BREEAM Excellent** – only achieved by 10% of new builds
- **EPC A** – the highest rating of building efficiency
- **Photovoltaic Panels** – a renewable source utilised to power you office functions
- **EV charging** – future-proofing our facilities for both workforce and fleet alike
- **CA Chronos Cladding** – unrivalled U-values and air permeability with superior acoustic performance
- **10% Roof Lights** – creating brighter work environments for staff wellbeing and reducing reliance on lighting
- **Cycle Parking** – promoting sustainable forms of travel for our occupiers' workforces and improving connectivity to the local community
- **Amenity Areas** – external landscaped areas to provide outside space and improve worker wellbeing

Strategic Targets

- Reduce the carbon emissions in our buildings by 50% by 2030 relative to a 2012 baseline
- Ensure all new construction meets an EPC rating of A
- All timber used on construction projects is documented as 'legally sourced and sustainable' as per the UK Government Central Point of Expertise on Timber (CPET)
- Primary construction materials will only be sourced from manufacturers that operate within a recognised Responsible Sourcing Certification Scheme (RSCS)
- Reduce water consumption in our buildings by greater than 25% of the current regulatory guidance
- All appointed main contractors will operate within a recognised Environmental Management System (EMS)

Duties

Directors have overall responsibility for ensuring compliance with statutory and other regulations relating to sustainable procurement. They are responsible for ensuring that there is a proactive approach to sustainable procurement within their area of control and are accountable for implementing the policy throughout the organisation and supply chain.

All staff are required to carry out their duties with regard to environmental, social and economic issues that align with the strategic targets. They have the responsibility to check suppliers and contractors environmental and ethical credentials.

Supply Chain are expected to ensure their practices are supportive of our approach to sustainable procurement. They must be able to demonstrate though robust means that goods and services that have been procured with minimum impact on the environment and with due regard to social issues such as employment conditions and welfare.

The Organisation level policy will be reviewed, adjusted and actioned on a yearly basis. First adopted June 2021.



Part 2

Project level

Materials

Preference will be given to companies which manufacture, fabricate or assemble goods that:

- have a full and relevant environmental policy 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 Environmental Product Declaration (EPD)

The design team and principal contractor will specify goods with a preference for locally sourced goods and provide opportunities to small and medium sized enterprises as well as the voluntary sector where possible.

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

Global Warming Potential (GWP)

To reduce the contribution we make to climate change, insulants with a GWP of less than 5 will be specified.

Volatile Organic Compounds (VOC's)

Long-term exposure to VOC's can have a negative effect on human health. These chemicals can be found in products including paint, sealants, glues and internal finishes. To minimise the impact of materials containing VOC's, the design and the principal contractor will:

- 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

Timber & Timber Products

Tungsten Properties is committed to specifying timber and timber products from legal and sustainable sources as defined by the UK Government Central Point of Expertise on Timber (CPET).

Both PEFC and FSC are acceptable with a full chain of custody. We also recognise timber traceable to a forest with a fully implemented forest management plan in line with the UK Forestry Standard (UKFS).

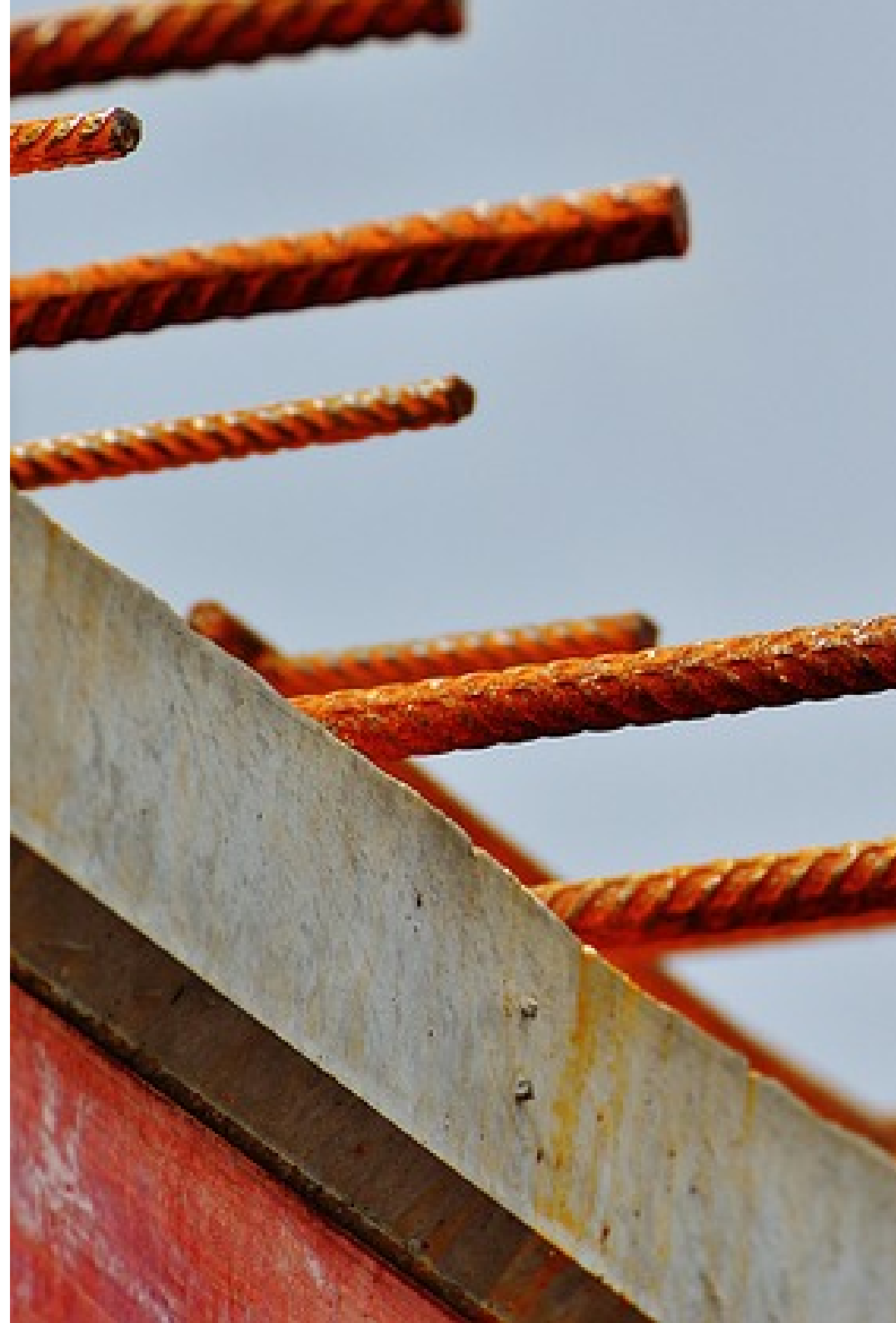
Prior to timber products being procured, the supplier will be required to provide the necessary documentation confirming compliance with the above requirements.

The appointed principal contractor will be required to comply with the above criteria relating to responsibly sourced timber when sourcing timber-based products.

All other supply chain members providing timber must be able to evidence compliance.

Recycled Aggregate

Suppliers of recycled aggregate must be in full compliance of the duty of care requirements of the Waste Management Regulations or the WRAP Quality Protocol. Delivery documentation shall state that the product was produced under a quality protocol.



Works

The principal contractor will be encouraged to operate within a third party recognised Environmental Management System such as ISO14001.

The site will be registered for the Considerate Constructors scheme.

Packaging

Use of packaging should be minimised and made from materials that can be reused. The principal contractor will have a written policy committed to reducing waste, including packaging.

We will engage with manufacturers, suppliers and contractors to jointly develop strategy to reduce packaging and recycle where this is not practical.

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
- 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.

The principal contractor will require manufacturers, suppliers or subcontractors to take back any excessive packaging for subsequent reuse or recycling at their own expense.

Site Plant

To reduce carbon emissions and fuel we will encourage the principal contractor to procure all plant and equipment efficiently-sized for the task in hand and which is no more than 18 months old. The principal contractor will give preference to the use of Stage IV diesel engines as a minimum.

The principal contractors policy on plant will be in line with relevant emission standards for new non-road diesel engines.

Fuel use will be targeted, recorded and reported on project completion.

Welfare facilities

Temporary accommodation units provided by the principal contractor must include energy and water saving measures. Hand towels are not to be provided where hand dryers are installed.

All white goods purchased for use in site offices must be a minimum of A-rated under the EU Energy Efficiency Labelling Scheme.



Waste & Recycling

The principal contractor will carry out regular audits of waste contractors to ensure that they have advanced waste management capabilities that guarantee maximum segregation and recovery.

To support zero waste to landfill ambitions, companies who can demonstrate a minimum diversion from landfill of 90% for mixed construction waste will be favoured.

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). All security guard personnel on our projects must have a current SIA license.

Air Quality

Best practicable means must be used when planning and undertaking works to reduce or prevent emissions to air.

Water must be used to prevent dust generation and vehicles must be sheeted when they are delivering or carrying dusty materials on or off-site.

Services

We rely on our 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.

Modern Slavery

The principal contractor, sub-contractors and professional service suppliers are required to provide details to Tungsten Properties of the steps undertaken to ensure Modern Slavery and Labour Exploitation are not taking place in its supply chain or other parts of its business.

Supplier and subcontractors are required to:

- maintain a complete set of records to trace the supply chain of all goods and services provided to Tungsten Properties
- implement annual supplier and subcontractor audits, either directly or through a third party auditor to monitor performance

Labour Standards

The principal contractor, sub-contractors and professional service suppliers are required to:

- afford their employees the freedom to choose to work for them
- impose working hours on their staff which are compliant with national laws or industry standards
- take appropriate measures to ensure the health and safety of their workforce and the wider public
- offer wages and benefits that at least meet relevant industry benchmarks or national legal standards

Payments

The principal contractor and sub-contractors must pay suppliers and sub-contractors on time and in accordance with the contract conditions.

Community Engagement

The principal contractor and sub-contractors are required to:

- engage positively with the local community, and support Tungsten Properties to minimise disruption to local people
- provide silenced plant/equipment and enforce the use of covers, baffles and noise suppressants
- discuss with the project lead the location and use of noisy equipment such that precautions can be taken to protect local communities and people not directly engaged in the activity
- provide details of attributable spend with local suppliers and sub-contractors within a 25 mile radius
- advertise local supply chain opportunities

Implementation

Part 2 of this Sustainable Procurement Policy will be issued to the wider design team and principal contractor for the proposed development, to facilitate sustainable procurement.

Once appointed, the design team and the principal contractor will arrange a meeting to introduce the sustainable procurement aims, objectives and strategic targets to guide procurement activities.

- 1 Tungsten Properties to appoint member of the design team to oversee and implement sustainable procurement requirements during the production of the architectural specification.



- 2 Design team and principal contractor to complete Sustainable Procurement Progress Plan and return at project completion to confirm implementation of the sustainable procurement activities from conceptual design stage through to project completion



- 3 Once appointed, design team to brief principal contractor on the sustainability procurement plan with respect to goods (under contractors scope of works), works and services.



- 4 Principal contractor to appoint team member to ensure the successful implementation of the sustainable procurement plan.



Sustainable
Procurement
Progress Plan

SUSTAINABLE PROCUREMENT PROGRESS PLAN

PROJECT: [INSERT PROJECT NAME]

SUSTAINABILITY LEAD: [INSERT NAME]

Ref.	Description	Mandatory	Preference	Where technically feasibly	Achieved / Justification for not achieving
PRODUCT MANUFACTURERS					
1.0	To have a full and relevant environmental policy	X			
1.1	To have or be working towards a full environmental management system e.g. EMAS, ISO 14001 or BS8555 from a UKAS registered certification body.		X		
1.2	Responsible sourcing of materials to BES 6001, BS 8902		X		
1.3	Product manufacturers to have, or be working towards BS EN 15804 compliant EPD		X		
1.4	Share best practice, new products & innovation with design team, principal contractor & supply chain		X		
1.5	Provide technical information to support any performance related product claims when requested	X			
1.7	Design team and principal contractor to specify local goods and provide opportunities to small and medium sized enterprises as well as the voluntary sector		X		
PRODUCT DISTRIBUTORS					
1.8	To have a full and relevant environmental policy	X			
1.9	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		
CIRCULAR ECONOMY					
2.0	Specification of circular economy products			X	
GLOBAL WARMING POTENTIAL					
2.1	The GWP of insulants to be less than 5	X			

Ref.	Description	Mandatory	Preference	Where technically feasible	Achieved / Justification for not achieving
VOLATILE ORGANIC COMPOUNDS					
2.2	Use of low or zero VOC paints and sealants		X		
2.3	Design out the use of high VOC products		X		
2.4	Ensure that all materials and substances used comply with relevant legislation	X			
TIMBER & TIMBER PRODUCTS					
2.5	All fixed timber & temporary timber to be from legal and sustainable sources (PEFC or FSC)	X			
2.6	Preference for timber which is assured as 'Grown in Britain'		X		
RECYCLED AGGREGATE					
2.7	Suppliers of recycled aggregate must be in full compliance of the duty of care requirements of the Waste Management Regulations or the WRAP Quality Protocol	X			
PACKAGING					
2.8	Use of large pack sizes to reduce the amount of packaging per unit		X		
2.9	Collect and reuse packaging and protective materials as frequently as possible	X			
3.0	Using cardboard wrapping where appropriate instead of plastic wrapping		X		
3.1	Promote the use of manufacturer branded pallets to ensure clear ownership and encourage repatriation		X		
3.2	Polystyrene packaging should be avoided as it cannot be easily recycled or reused	X			

Ref.	Description	Mandatory	Preference	Where technically feasible	Achieved / Justification for not achieving
SITE PLANT					
3.3	Principal contractor to use Stage IV non-road diesel engines		X		
3.4	Fuel use targets are set	X			
3.5	Fuel use recorded	X			
3.6	Fuel use reported on project completion	X			
WELFARE FACILITIES					
3.7	All white goods purchased for use in site offices must be A-rated under EU Energy Labelling Scheme	X			
3.8	Hand towels are not to be provided where hand dryers are installed	X			
3.9	Temporary accommodation to include energy and water saving features		X		
CONTRACTORS					
4.0	Demonstrate continuous development and improvement	X			
4.1	Have a full relevant environmental policy	X			
4.2	Have or be 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	X			
4.3	Maintain a trained and competent workforce appropriate to the duties they are undertaking, and provide evidence if requested	X			

Ref.	Description	Mandatory	Preference	Where technically feasible	Achieved / Justification for not achieving
CONTRACTORS					
4.4	Are receptive to the promotion and management of apprenticeship opportunities and/or training and development of site operatives	X			
4.5	Comply with all UK employment legislation and ensure that workers have the right to work in the UK	X			
4.6	Agency staff supply chain companies must have appropriate systems in place to comply with all UK employment legislation	X			
4.7	Security personnel must have current SIA license	X			
AIR QUALITY					
4.8	Best practicable means must be used when planning and undertaking works to reduce or prevent emissions to air	X			
4.9	Water must be used to prevent dust generation and vehicles must be sheeted when they are delivering or carrying dusty materials on or off-site	X			
WASTE & RECYCLING					
4.8	Principal contractor to carry out regular audits of waste contractors to ensure that they have advanced waste management capabilities	X			
4.9	Divert in excess of 90% of mixed construction waste from entering landfill	X			
PAYMENTS					
5.0	Principal contractor must pay suppliers and sub-contractors on time and in accordance with the contract conditions	X			

Ref.	Description	Mandatory	Preference	Where technically feasibly	Achieved / Justification for not achieving
MODERN SLAVERY					
5.1	Maintain records to trace supply chain of all goods and services		X		
5.2	Implement annual supplier and sub-contractor audits		X		
LABOUR STANDARDS					
5.3	Principal contractor to take appropriate measures to ensure the health and safety of their workforce and the wider public	X			
5.4	Principal contractor to offer wages and benefits that at least meet relevant industry benchmarks or national legal standards	X			
COMMUNITY ENGAGEMENT					
5.5	Engage positively with the local community	X			
5.6	Provide silenced plant/equipment and enforce the use of covers, baffles and noise suppressants	X			
5.7	Provide details of attributable spend with local suppliers and sub-contractors within a 25 mile radius	X			
5.8	Advertise local supply chain opportunities	X			