



SUPPLIER CODE OF CONDUCT

Shaftesbury

April 2017

INTRODUCTION

WE ARE COMMITTED TO ACT RESPONSIBLY THROUGHOUT OUR BUSINESS. OUR CORE OBJECTIVE IS THE SUSTAINABLE RE-USE AND CAREFUL MANAGEMENT OF EXISTING BUILDINGS IN AN ETHICAL AND RESPONSIBLE MANNER.

WE EXPECT SUPPLIERS AND ADVISORS THROUGHOUT OUR SUPPLY CHAIN TO SUPPORT THE DELIVERY OF OUR STATEMENT OF SUSTAINABILITY PRINCIPLES AS SET OUT IN OUR POLICY.

As a supplier to Shaftesbury we require you to adopt the same ethical and sustainable approach to the employment of labour and the purchase of goods and services on our behalf. We seek to influence behaviours in our supply chain to ensure a sustainable future.

We also support the ten principles of the UN Global Compact on human rights, labour, environment and anti-corruption set out below. This Supplier Code of Conduct sets out the standards that we expect of our suppliers to ensure that as a minimum we deliver on our corporate commitments.

We recognise that not all purchasing decisions have the same degree of impact, and the Supplier Code of Conduct will apply to our suppliers in different ways. In particular, for those suppliers that manage and refurbish our portfolio, we will proactively work with our supply chain to progressively improve performance.

UN GLOBAL COMPACT PRINCIPLES:

HUMAN RIGHTS

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.

LABOUR

- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labour;
- **Principle 5:** the effective abolition of child labour; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery. All the policies referenced are available on the sustainability section of our website www.shaftesbury.co.uk.

ENVIRONMENT

WE REQUIRE SUPPLIERS TO COMPLY WITH CURRENT UK ENVIRONMENTAL LEGISLATION AND OTHER LEGISLATIVE AND BEST PRACTICE REQUIREMENTS APPLICABLE TO THEIR ORGANISATION.

We also require all suppliers to undertake the following:

ENVIRONMENTAL MANAGEMENT

- Ensure that emissions to air, water, ground and causes of nuisance are minimised and any non compliances are reported to relevant authorities.
- Implement effective environmental management systems appropriate to their business.
- Comply with our Sustainability Strategy – our Policy, Action Plan and Checklists – as it applies to their organisation,
- Contribute to the requirement to achieve BREEAM Very Good for our larger refurbishments.

ENERGY AND WATER

- Identify and implement measures to improve energy and water efficiency where appropriate to their activities and in support of our objectives.

MATERIALS AND WASTE

- Maximise reuse of existing materials, including timber; within the refurbishment process.
- Select materials to minimise adverse impacts on the environment. Timber, in particular, will be sourced, where possible, from well-managed sources certified by third-party certification bodies accredited by the Forest Stewardship Council and neither illegal timber nor uncertified high risk timber species will knowingly be sourced.
- Minimise waste going to landfill and identify ways to maximise segregated waste recycling including composting food waste.

BIODIVERSITY

- Support our membership of the Wild West End and consider installation and management of planting such as green roofs, walls, planters and hanging baskets and other opportunities for biodiversity enhancement.

AIR EMISSIONS

- We are concerned about air pollution in central London. We encourage our suppliers to proactively work with other local occupiers, local authorities and the Mayor's office to investigate and promote solutions.

COMMUNITY

WE EXPECT OUR SUPPLIERS TO ENGAGE WITH THE LOCAL COMMUNITY AND MINIMISE DISRUPTION FROM THEIR ACTIVITIES.

CONSIDER THE LOCAL COMMUNITY

Contractors working on refurbishment and maintenance projects throughout the portfolio shall show consideration to occupiers of neighbouring properties and local communities and should adhere to the following minimum requirements:

- No vehicles in pedestrianised streets after 11am.
- All rubbish and debris to be removed only between 8am and 11am.
- Rubbish/debris shall not be stored on the street or common parts but shall be loaded directly from the site or scaffold. No skips shall be permitted.
- The street outside the site and common parts shall be cleaned each night.
- Shopfronts to be washed down on a regular basis.
- At least 48 hours' notice shall be given to neighbors of any disruptive work. This includes noisy and dirty works. This is to allow adjacent tenants to be notified accordingly.
- Operations on site shall be confined only to the contract area, unless prior approval is granted.

REGISTER WITH CONSIDERATE CONSTRUCTORS SCHEME

Above the threshold of £150,000 capital value, all our refurbishment schemes must be registered with the Considerate Constructors Scheme and comply with all of the requirements as appropriate.

ENGAGE WITH THE COMMUNITY

Engage with the local community and actively support local charitable initiatives, where appropriate.

We partner with selected charities in each village and through events in that village, use these as platforms to raise funds and promote awareness of their cause.

We encourage our suppliers to engage and work with our nominated charity partners. If you would like find out more about our community initiatives and opportunities to work with our charity partners please contact us at shaftesbury@shaftesbury.co.uk.

EMPLOYEES

AS SIGNATORIES TO THE UN GLOBAL COMPACT WE EXPECT SUPPLIERS, AS A MINIMUM, TO ADHERE TO ALL RELEVANT HUMAN RIGHTS, EMPLOYMENT AND HEALTH AND SAFETY LEGISLATION AND COMPLY WITH STANDARDS AND CODES SPECIFIC TO THEIR BUSINESS.

We also expect our suppliers to comply with the following:

HEALTH AND SAFETY

- Provide adequate management systems and support to deliver Shaftesbury's health and safety standards.
- Avoid using materials that may be harmful to health either during their manufacture, use or disposal.
- Maintain appropriate permits to work for all suppliers and contractors working on refurbishment sites and where appropriate require the possession of a valid Construction Skills Certification Scheme (CSCS) card.
- Maintain a record of all accidents and incidents in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) that occur within the portfolio and promptly report such incidents to us.

PROMPT PAYMENT/PAYMENT OF SUPPLIERS

- As signatories of the Prompt Payment Code we undertake to pay our suppliers within 30 days unless otherwise agreed. Full details of our approach is set out in our Payment of Suppliers Policy. We encourage our suppliers to offer the same terms and to pay on time.

LOCAL EMPLOYMENT

- Be proactive in offering local businesses and local people the opportunity to work as suppliers, contractors and employees within our portfolio.

DIVERSITY

- Adhere to the six principles of the RICS Inclusive Employers Quality Mark demonstrating commitment at the highest level to diversity throughout the workforce. The six principles of the Quality Mark are detailed below:
 - **Leadership and vision**
Demonstrable commitment at the highest level to increasing the diversity of the workforce
 - **Recruitment**
Engage and attract new people to the industry from under-represented groups; best practice recruitment methods.
 - **Staff development**
Training and promotion policies that offer equal access to career progression for all members of the workforce.
 - **Staff retention**
Flexible working arrangements and adaptive working practices that provide opportunities for all to perform at their highest levels.

— Staff engagement

An inclusive culture where all staff engage with developing, delivering, monitoring and assessing the diversity and inclusivity policies.

— Continuous improvement

Continually refreshing and renewing the firm's commitment to being the best employer; sharing and learning from best practice across the industry

- Ensure that employees are not discriminated against in employment or occupation on the grounds of gender, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability. The supplier must also comply with legislation relating to employees with disabilities.

HUMAN RIGHTS AND LABOUR PRACTICES

- Adhere to the labour standards required by our policies in the employment of suppliers and sub-contractors working on the portfolio. Ensure all are offered a safe workplace free from discrimination, harm, intimidation, harassment or fear.
- Promote the implementation of payment of the London living wage throughout the supply chain. Ensure that all suppliers and contractors comply with the payment of the minimum wage to their employees.
- Ensure that all suppliers and contractors working on our portfolio never use forced, compulsory or child labour and ensure all labour is voluntary and is employed with applicable labour laws and international standards. We require our suppliers to comply with the requirements of the Modern Slavery Act 2015 and demonstrate compliance within their supply chain. Our Modern Slavery Statement is on our website.
- Respect the rights of workers to join or not to join a trade union and as such they are free to join an association of their choice to represent them in line with legislation. Suppliers must respect any legal right of workers to bargain collectively. Any disciplinary or discriminatory actions by the employer against the employees who choose to peacefully and lawfully organise or join an association will not be acceptable.

BRIBERY, ANTI-CORRUPTION AND MONEY-LAUNDERING

- Ensure appropriate policies are in place to promote the ethical conduct of business and ensure the prevention, detection and reporting of bribery and corrupt practices.
- Ensure fair practices are adopted in the competing for business and that all suppliers will make purchasing decisions objectively based on price, delivery, quality and other relevant factors.
- Ensure all suppliers are aware of and comply with any applicable anti-money laundering laws.