

SUSTAINABLE PROCUREMENT POLICY

June 2026

Willmott Dixon Holdings

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1. INTRODUCTION

Willmott Dixon is a privately-owned contracting and interior fit-out group dedicated to delivering brilliant buildings, transforming lives, strengthening communities, and enhancing the environment so our world is fit for future generations. Our Now or Never Strategy sets out how we will do this and recognises the important part our supply chain partners play in achieving our ambitions.

Working collaboratively to solve shared problems is key to our future success. We want our partners to reflect our business, sharing our values and helping us deliver our goals. This collective effort will enable us to succeed as one team even in the most demanding of situations. Delivering our sector-leading ambitions will call on our partners' skill and expertise, their innovation and inspiration as well as their commitment that it is the right thing to do.

This policy sets out what we expect of both our supply chain partners and our people to ensure our procurement practices are sustainable, innovative, and industry leading.

2. SCOPE

This policy applies to all procurement activity carried out by Willmott Dixon Holdings, including Willmott Dixon Construction and Willmott Dixon Interiors. It also applies to those purchasing activities carried out on our behalf or by our supply chain partners; this includes designers, consultants, specifiers, trade contractors, product manufacturers and product distributors. Our partners should also refer and adhere to requirements found in the Willmott Dixon Yellow Book Design guide where applicable.

Our supply chain partners can be classed as:

- **Goods Partners** – those manufacturers and distributors we purchase materials and products from, either directly or on our behalf.
- **Works Partners** – those labour and trade suppliers whom we contract to work on our projects. These partners may also supply goods, or provide other services such as site security or waste management, etc.
- **Design and Consultancy Partners** – those professional skills and expertise we procure, such as design consultancy, architects, etc.

Requirements that apply only to specific categories are made clear in each section of the policy.

Requirements within this policy are set out as follows:

- **Mandatory** - Must be complied with by all relevant parties.
- **Preference** - We will procure with a preference for these requirements where all other aspects of delivery are equal.

This policy is subdivided into several sections. Not all sections will be relevant to all partners. This section acts as a navigation tool to direct our partners to the sections of the policy most relevant to them.

This policy is also relevant to **purchasing activity that is only relevant to Willmott Dixon**; specific activities and relevant requirements are listed within section 7.0.

3. ALL SUPPLY CHAIN PARTNERS

Below is a summary of the requirements for all Willmott Dixon's supply chain partners. Unless otherwise stated, requirements apply to all partners:

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
Environmental	To have a full & relevant Environmental Policy to demonstrate they are undertaking initiatives to promote greater environmental responsibility & development of environmental products in line with the environment principles of the UN Global Compact Principles ¹ .	X	
	All partners must adhere to the Sub-Contractor Environmental Conditions Appendix C6	X	
	All partners must apply the Waste Hierarchy and work towards zero avoidable waste. Upon request provide evidence to demonstrate progress against the hierarchy as set out in the Waste Regulations 2011) ² .	X	
	Upon request – all partners to collaborate with Willmott Dixon to demonstrate that they are working towards achieving net zero carbon in their own operations	X	
	Non-road diesel engines used on WD sites should meet the following standards as a minimum: • Small plant (<3T): Stage IIIB • Medium plant (3T – 13T): Stage IIIB (Stage IV for Telehandlers) • Large Plant (>13T): Stage IV • Compliance with Stage V regulations where applicable	X	
	All partners must offer to Willmott Dixon the option to use plant & machinery that is compatible with Hydrotreated Vegetable Oil or is electric.	X	
Social	Inform Willmott Dixon of all social value activities you complete within your organisation, upon request.	X	
	To comply with the requirements of the Modern Slavery Act 2015 and Willmott Dixon's Modern Slavery Policy.	X	
	To work and engage with Small Medium Enterprises (SMEs), Social Businesses, local labour and provide locally sourced goods wherever possible (other than where a strategic agreement exists) as classified in the Glossary of Terms in section 8.	X	
	To provide detail of spend and engagement with SMEs and Social Businesses upon request.	X	
	To promote equality and diversity in their workforce.	X	
	All partners are encouraged to pay the Real Living Wage to their Workforce	X	

¹ See <https://www.unglobalcompact.org/what-is-gc/mission/principles> principles 7-9

² Examples of best practice to demonstrate adherence to the waste hierarchy, include actions such as: use of larger pack sizes to reduce the amount of packaging per unit; collection and reuse packaging and protective materials as many times as possible; using cardboard wrapping where appropriate instead of plastic wrapping (e.g. bubble wrap); supplying 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

Technical	To provide technical and transparent evidence to support any performance related product claims when requested by Willmott Dixon.	X	
	Where raw materials are sourced from high-risk countries ³ , partners must; provide evidence on request to demonstrate how the risk of forced labour is being mitigated and align with the UN Global Compact Principles 1-6.	X	
	All strategic and Cat A partners to have a Sustainability Policy and/or a Sustainable Procurement Policy.	X	
	To ensure that all materials and substances used comply with relevant UK legislation.	X	
	To be an active member of the Supply Chain Sustainability School, with a preference for bronze, silver or gold membership.	X	
	All partners to adhere to the Willmott Dixon Yellow Book design principles when applicable.	X	

4. STRATEGIC GOODS PARTNERS

In addition to those requirements set out in section 3.1, strategic goods suppliers should also comply with the following requirements:

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
Manufacturers only	To have a certified environmental management system. e.g. EMAS, ISO 14001 or BS 8555 from a UKAS registered certification body.	X	
	Upon request provide the plastic content and recycled content of the key products supplied to Willmott Dixon.	X	
All partners	To provide product lifecycle carbon information or EN 15804 compliant Environmental Product Declarations (EPDs) for all products supplied when requested.	X	
	To have a waste reduction plan in place that goes beyond minimum compliance and includes take back and reuse of excess products and eliminating all avoidable packaging waste. Plan must include a commitment to eliminating all avoidable single use plastics by 2030.	X	
	Provide evidence upon request of your companies plan with defined targets and milestones to achieve net zero carbon in your operations.	X	

³ As defined by the Global Slavery Index. Current high-risk countries: Afghanistan, Belarus, Brunei Darussalam, Burundi, Cambodia, Central African Republic, Chad, Democratic Republic of Congo, Eritrea, Iran, Kuwait, Libya, Mauritania, Mongolia, Myanmar, North Korea, Pakistan, Russia, Rwanda, Saudi Arabia, Somalia, South Sudan, Sudan, Tajikistan, Turkmenistan, Türkiye, United Arab Emirates, Xinjiang – China.

5. KEY GOODS PARTNERS & PRODUCTS

Suppliers of the following products must also demonstrate compliance with requirements listed in the below table:

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
Manufacturers only	To provide evidence to show full transparency on origin of products (extraction, manufacturing, distribution, transportation distance) and identify all parties in their supply chain tiers when requested.	X	
	To provide evidence of the recycled content of products as a percentage and, upon request by Willmott Dixon, plans to further maximise recycled content in specific products where practicable.	X	
All products	Preference will be given to those supply chain partners who can provide life cycle carbon information for their products.		X
	Products to comply with a recognised scheme for responsible sourcing of materials such as BES 6001 or other sector schemes compliant with BS 8902.		X
Drylining & Partitioning	Demonstrate that a robust carbon foot printing exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X	
Finishes & Sealants	No paints or other finishes to contain lead.	X	
	To ensure only low and zero VOC paints, finishes and sealants are offered to Willmott Dixon (e.g. water based instead of solvent based paint for external walls) where practicable.	X	
	Preference will be given to those partners that can design out the use of high-VOC products by selecting alternative materials and finishes where practicable and appropriate.		X
Concrete & Cement	To comply with a recognised scheme for responsible sourcing such as BES 6001 or other sector schemes compliant with BS 8902.	X	
	To provide evidence of the recycled content of products and, upon request by Willmott Dixon, plans to further maximise recycled content in specific products.	X	
	To maximise the use of cement replacements in concrete and provide the upfront embodied carbon of any concrete supplied where technically and financially feasible.	X	
IT	Photocopiers and networked printers (excluding wide format printers) to have secure print and have default setting of double-sided and black and white printing.	X	
	Products to be rated low energy consumption as recognised by Energy Star or similar and include built-in power management features.	X	
	Equipment manufacturers to have a managed asset recovery service to take back and recycle equipment.	X	

	Request that information on the full life-cycle performance of a product is made available by the supplier so it can be evaluated by Willmott Dixon during procurement.	X	
	Provide evidence that used IT equipment is recycled through a take back scheme in accordance with the WEEE Regulations at an Approved Authorised Treatment Facility (AATF).	X	
Insulation	The Global Warming Potential (GWP) of insulants to be less than 5, or less than 8 if aerosol based.	X	
Natural Stone	Demonstrate that a robust carbon foot printing exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X	
	To procure natural dimensional stone from suppliers demonstrating leadership in the ethical stewardship of their supply chain. ⁴	X	
POLYVINYL CHLORIDE (PVC)	To either operate a take-back scheme that offers a closed-loop recycling system or identify a mechanical recycling system for unbonded installation waste.	X	
	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	X	
	All chemicals used in manufacture of PVC to be registered under REACH ⁵ .	X	
	To either; minimise, provide alternatives to, or design out the use of PVC products containing Phthalates	X	
Steel & Aluminium	To provide product lifecycle carbon information and the recycled content of steel products supplied upon request.	X	
	Demonstrate that a robust carbon foot printing exercise has been carried out to quantify the carbon impacts across each lifecycle stage of your key product(s). Now mandatory for specific products.	X	
	All steel products to comply with a recognised scheme for responsible sourcing such as BES 6001 or certification to CARES, ECO Reinforcement.	X	
	To supply electric arc furnace (EAF) steel where technically and commercially feasible	X	
	All aluminium products to be certified under the Aluminium Stewardship Initiative (ASI) Performance Standard and/or Chain of Custody Standard.		X

⁴ Recognised schemes include compliance with a recognised responsible sourcing scheme certified by a third party, or membership of the following: Ethical Trading Initiative (ETI Stone Group), The Ethical Stone Register, the TFT Responsible Stone Programme (Earthworm), Fair Stone, UN Global Compact or membership of the Stone Federation GB.

⁵ See <https://www.hse.gov.uk/reach/about.htm> for further information.

Timber Products	All fixed timber & temporary timber must be from legal and sustainable sources PEFC, FSC, or Grown in Britain, and accompanied by Chain of Custody information and evidence of this issued to Willmott Dixon ⁶	X	
	All supply chain members providing timber must be able to evidence compliance with obligations of the UK Timber Regulation (UKTR) ⁷ when required.	X	
	Avoid products with added urea formaldehyde where possible.		X

6. WORKS SUPPLY CHAIN PARTNERS

Below is a list of requirements for all labour and trade supply chain partners. Unless otherwise stated, the requirements apply to all partners, irrespective of category

6.1 ALL LABOUR AND TRADE

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
All partners	To comply with all UK employment legislation to ensure that workers have the Right to Work in the UK and provide evidence of compliance to Willmott Dixon upon request.	X	
	Must not require or permit compulsory overtime in your workforce.	X	
	Maintain a trained and competent workforce appropriate to the duties they are undertaking and provide evidence if requested.	X	
	Supplying and using HVO fuel on Willmott Dixon projects must provide a copy of Proof of Sustainability and to ensure that all HVO is responsibly sourced in line with the International Sustainability and Carbon Certification.	X	
	To ensure all operatives have the suitable pre-enrolment to carry out the works for which they are employed.	X	
	Upon request partners to commit to achieving net zero carbon in their own operations by 2030.	X	

⁶ The Timber Trade Federation has more information available on the chain of custody evidence required to prove compliance. See <https://www.atibt.org/en/members/99/ttf-timber-tradefederation>

⁷ The UK Timber Regulation (UKTR) came into force on 1 January 2021, replacing the European Timber Regulation (EUTR) and Forest Law Enforcement Governance and Trade (FLEGT) which no longer apply in Great Britain. See <https://www.gov.uk/guidance/regulations-timber-and-flegt-licences> for further information.

	All requested partners must baseline their carbon footprint and report it via the Supply Chain Sustainability School online carbon tool on an annual basis.	X	
	Promote, create and manage apprenticeship opportunities		X
Groundworkers	All partners to have a plan in place to reduce diesel use upon request and eliminate before 2030.	X	
	To support the reuse of excavation arisings as material in line with Claire DoWCoP or Environmental Permits.	X	

6.2 WASTE MANAGEMENT (CONSTRUCTION, EXCAVATION & DEMOLITION)

All partners	Must demonstrate a commitment to providing waste data that is compatible with SmartWaste. E.g. via Bulk upload or API.	X	
Demolition waste Partners	Must demonstrate evidence of a waste reduction plan which supports and provides plans for reuse of material in line with the waste hierarchy as specified in the Waste Regulations (2011) for demolition waste arisings.	X	
Construction waste partners	Construction waste management partners to demonstrate a minimum diversion from landfill of 95% for construction waste, unless agreed with the Willmott Dixon Head of Environment.	X	

6.3 AGENCY LABOUR & SITE SECURITY

All partners	To comply with all UK employment legislation to ensure that workers have the Right to Work in the UK and provide evidence of compliance with Willmott Dixon upon request.	X	
	Use security services from companies approved by the Security Industry Authority (SIA) and ensure all security guard personnel have a current SIA licence.	X	

6.4 DESIGN AND CONSULTANCY SUPPLY CHAIN PARTNERS

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
All partners	To provide lifecycle costing information to inform product selection e.g. associated maintenance & deconstruction costs over 60-year building life.		X
	Partners must support Willmott Dixon's requirements to design out waste in line with the waste hierarchy and our ambition to generate zero avoidable waste by 2030	X	

PROCUREMENT REQUIREMENTS SPECIFIC TO WILLMOTT DIXON

SUBHEADING	REQUIREMENT	MANDATORY	PREFERENCE
Catering	Request that supply chain caterers supply food using Fairtrade produce, locally sourced and currently in season where practicable.	X	
External publications & printed media	External publications to use standard paper sizes sourced from either FSC, PEFC or Grown in Britain certified sources, 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	
Site Accommodation	Temporary Electric Partners to comply and collaborate with Willmott Dixon to efficiently set up site with regards to energy and submetering	X	
	All white goods purchased for the purposes of temporary accommodation must be a minimum of A-rated under the EU Energy Efficiency Labelling Scheme.	X	

7. GLOSSARY OF TERMS

Carbon Footprint – The total amount of greenhouse gas emissions produced directly and indirectly by a person, organisation, event, or product

Chain of Custody – The process of ensuring that a forest product has come from a legal and responsible source

Environmental Management System (EMS) – Provides a framework for an organisation of any size to manage its significant environmental impacts

Embodied Carbon – The carbon emissions associated with the energy and industrial processes used in the processing, manufacture and delivery of materials, products and components required to construct, maintain and deconstruct a building.

EPD (Environmental Product Declaration) – An independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products in a credible way

Global Warming Potential (GWP) – The relative potency of a greenhouse gas relative to one unit of carbon, taking into account how long it remains in the atmosphere

Real Living Wage – rate paid by employers that goes above and beyond the national minimum wage to ensure that their employees are paid a wage that covers the cost of living

SME (Small and Medium-sized Enterprise) – An organisation with less than 250 employees and an annual turnover of less than €50 million or a balance sheet of less than €43 million

Social Business – A business which sells goods and services on the open market to create employment and reinvest their profits back into their business or the local community with a social or environmental aim.

Social Value – The value delivered to society through business activities.

Strategic Partner – Supply chain partners that are bound by a separate strategic agreement focusing on a specific product, component, or assembly