



SUPPLIER CODE OF CONDUCT

Shaftesbury

March 2023

INTRODUCTION

WE ACT IN A SOCIALLY RESPONSIBLE MANNER THROUGHOUT OUR BUSINESS. OUR STRATEGY IS THE SUSTAINABLE RE-USE AND CAREFUL MANAGEMENT OF EXISTING BUILDINGS IN AN ETHICAL AND RESPONSIBLE MANNER. WE ARE COMMITTED TO BECOMING A NET ZERO CARBON COMPANY BY 2030.

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

As a supplier to Shaftesbury we require you to adopt our ethical and sustainable approach to the employment of labour and the purchase of goods and services on our behalf, as set out in this code. We seek to influence behaviours in our supply chain to ensure a sustainable future and we will engage suppliers that are able to demonstrate how their own sustainability commitments can support the achievement of our goals.

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. The code is incorporated into supplier contracts as a legally binding requirement.

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 buildings, we will work with our supply chain to progressively improve performance. However, we expect our suppliers to embrace the ethos of the code.

We support the ten principles of the UN Global Compact on human rights, labour, environment and anti-corruption set out below and have embedded appropriate UN Sustainable Development Goals into our business strategy.

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.shaftesburycapital.com.

ENVIRONMENT

WE REQUIRE SUPPLIERS AND ADVISORS TO ACKNOWLEDGE AND COMPLY WITH CURRENT UK ENVIRONMENTAL LEGISLATION AND OTHER LEGISLATIVE AND BEST PRACTICE REQUIREMENTS.

We require all suppliers to comply with our Sustainability Policy, Sustainability Action Plan, and associated checklists, as it applies to their organisation. These can be found on our website at shaftesburycapital.com

Suppliers are also required to undertake the following where appropriate:

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.
- Contribute to our corporate objective to achieve BREEAM Very Good for our larger refurbishments and minimum EPC rating requirements.

ENERGY AND WATER

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

CARBON EMISSIONS

- Identify and implement opportunities to reduce carbon emissions associated with the delivery of products or services in line with Shaftesbury's net zero carbon goals.
- Use materials with low embodied carbon where practical.
- Set your own corporate carbon reduction targets and inform Shaftesbury of your objectives.
- Consider committing to science-based targets for carbon emissions reductions and having them validated by the Science Based Targets initiative.
- Source energy from renewable supplies where possible.

MATERIALS AND WASTE

- Maximise reuse of existing materials, including timber, within the refurbishment process.
- Select materials to minimise adverse impacts on the environment. Timber will be sourced, where possible, from well-managed sustainable sources certified by third-party certification bodies accredited by the Forest Stewardship Council. Neither illegal timber nor uncertified high risk timber species will be sourced.
- Minimise waste going to landfill and identify ways to maximise segregated waste recycling including composting food waste.
- Work towards the eradication of single use plastics. Help to facilitate initiatives with our tenants to address the unnecessary use of plastic in the supply chain and the resulting pollution.

BIODIVERSITY

- When working on projects involving biodiversity, follow the principles 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. Use the Wild West End planting matrix.

AIR QUALITY

- We recognise the importance of air quality to visitors and residents to the West End. We encourage our suppliers to proactively work with other local occupiers, local authorities and the Mayor's office to investigate and promote solutions, as well as minimise impact on air quality.

* For more information please visit www.wildwestend.London

COMMUNITY

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

CONSIDER THE LOCAL COMMUNITY

Contractors working on refurbishment and maintenance projects throughout our 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.
- At least 48 hours' notice shall be given to neighbours of any disruptive work. This includes noisy and dirty work. 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 £250,000 capital value, all our refurbishment schemes must be registered with the Considerate Constructors Scheme and comply with all the requirements as appropriate.

ENGAGE WITH THE COMMUNITY

Actively support local charitable initiatives, where appropriate.

We partner with selected charities in each of our locations and through events and social media, 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 to find out more about our community initiatives and opportunities to work with our charity partners please contact us at **feedback@shaftesburycapital.com**.

Please inform Fiona Daly, Community Engagement Manager, of any charitable activity relating to the project at **fiona.daly@shaftesburycapital.com**.

EMPLOYEES

AS SIGNATORIES TO THE UN GLOBAL COMPACT PRINCIPLES 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.

HEALTH AND SAFETY

- Provide adequate management systems and support to deliver Shaftesbury's health, safety and wellbeing 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 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

- We undertake to pay our suppliers within 30 days unless otherwise agreed. Full details of our approach is set out in our Supplier Payment Policy. We encourage our suppliers to offer the same terms to their suppliers 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. For the purpose of this requirement, the local area is defined as being the London Boroughs of Camden and Westminster.
- Work with local job hubs or agencies to advertise roles and recruit local people, where appropriate.

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.

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.
- Ensure that all suppliers and contractors comply with the payment of the living wage to their employees in accord with the requirements of the Living Wage Foundation and consider accreditation to that scheme where appropriate.
- Promote the implementation of payment of the London living wage throughout the London based supply chain.
- 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 on terms which meet 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 and tax evasion laws, including Part 3 of the Criminal Finances Act 2017.
- Ensure all suppliers and their employees are aware of the whistleblowing procedures in place and feel safe to raise a concern with no risk of reprisal. Provide an anonymous complaint mechanism for suppliers and employees to report any concerns, whilst protecting the whistleblower's confidentiality and fear of reprisal. Details below.

Whistleblower's Helpline via Safecall

Telephone: 0800 915 1751

Website: www.safecall.co.uk/report