



SHAFTESBURY
CAPITAL

Sustainability
Supplier
Requirements
2025

Introduction

Our strategy is to deliver long-term income and value growth from our portfolio through investment, curation and responsible stewardship, benefitting all stakeholders and contributing to the success of the West End.

We act in a socially responsible manner throughout our business. Our strategy is based on the sustainable re-use and careful management of existing buildings in an ethical and responsible manner. We are committed to becoming Net Zero Carbon by 2040.

We work in partnership with suppliers and advisers throughout our supply chain to support the delivery of our sustainability principles.

We are committed to:

- Achieving our sustainability aspirations as set out in our strategy on our website [here](#)
- Considering sustainability in supplier selection
- Transparent reporting and sharing best practice
- Supporting our local communities
- Working in partnership with our suppliers to achieve our sustainability goals

We have identified appropriate UN Sustainable Development Goals which align with our business strategy.

How we deliver

Place our customers at the heart of the business

- Deliver best in class service to all customers
- Leverage deep understanding of consumers and commercial data

Creative and active approach

- Invest in and nurture remarkable destinations in London's West End
- Dynamic leasing strategy
- Re-use, re-purpose and improve our buildings
- Enhance public realm

Disciplined financial management

- Prudent, conservative approach to financial leverage and risk
- Maintain cost and capital discipline

Sustainable and community minded

- Broad community and stakeholder engagement
- Responsible stewardship
- Commitment to the environment and clear sustainability goals

Our values are fundamental to our behaviour, decision-making and delivery on purpose and strategy



**Take a responsible,
long-term view**



Act with integrity



**Take a creative
approach**



**Listen and
collaborate**



Make a difference

Underpinned by our talented team and dynamic culture

How we work with suppliers

Our requirements:

As a supplier to Shaftesbury Capital, 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. You are also required to ensure that your supply chain adopts the same standards.

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 statement of supplier requirements sets out the standards that we expect of our suppliers to ensure that as a minimum we deliver on our corporate commitments. Suppliers are required to confirm that they accept the requirements, as applicable to them. Specific requirements are also included in individual contracts as appropriate.

In particular:

- Aligning with our Sustainability Policy, Modern Slavery commitment and abiding by the Sustainability Development Brief as required.
- Meeting all relevant legal environmental, health & safety, employment requirements.
- Complete our New Supplier Questionnaire.

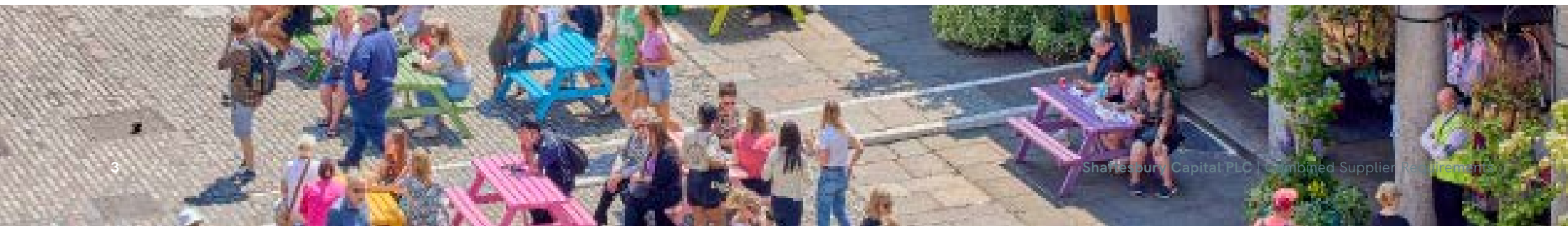
We recognise that not all purchasing decisions have the same degree of impact, and the Supplier Requirements will apply to our suppliers in different ways.

Our commitment:

Work in partnership with suppliers of goods and services to understand and help implement appropriate environmental, ethical and health and safety standards.

We will:

- Operate with transparency, openness and respect
- Provide additional information on our requirements as needed
- We endeavour to pay our suppliers within 30 days unless otherwise agreed. We encourage our suppliers to offer the same terms to their suppliers and to pay on time.
- Use local suppliers and contractors where appropriate.
- Identify and purchase sustainable or ethical alternatives where appropriate, taking account of the product's entire lifecycle and making use of environmental, health and safety and ethical labels to guide product specification.
- Conduct regular audits and reviews of our management systems and key suppliers.
- Promote awareness of our Procurement and Supplier Management Policy to our staff responsible for procurement and wider employees through internal communications.
- Share information on the steps we are taking to avoid incidences of modern slavery in our own operations and in our supply chain
- Regularly communicate with our key suppliers to understand how the performance of products and services can be improved and provide our support as appropriate





Environment

We require suppliers and advisers to acknowledge and comply with current UK environmental legislation.

Suppliers must comply with our Sustainability Policy and associated documentation, as it applies to their organisation. These are on our website at www.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.
- Minimise risk of pollution incidents and have a documented process for the management of environmental risks.
- Implement effective environmental management systems.
- Contribute to our corporate objective for BREEAM and minimum EPCs.

Energy and water

- Identify, implement and track measures to improve energy and water efficiency

Carbon emissions

- Identify and implement opportunities to reduce carbon emissions associated with the delivery of products or services in line with Shaftesbury Capital's Net Zero Carbon goals.
- Use materials with low embodied carbon where practical.
- Set corporate carbon reduction targets and inform Shaftesbury Capital 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 and follow our Timber Procurement Policy.
- Send zero waste to landfill and identify ways to maximise segregated waste recycling including composting food waste.
- Work towards the eradication of single use plastics, utilise reusable or natural packaging material, or takeback schemes if feasible.

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.

Air quality

- We encourage our suppliers to proactively work with their supply chain, our occupiers, local authorities and the Mayor's office to investigate and promote solutions that minimise negative impact on air quality.

As part of our environmental reporting requirements you may be asked for:

- Greenhouse gas emissions for your activities relating to Shaftesbury Capital
- Environmental certifications
- Environmental product declarations or other documentation needed to demonstrate achievement of our environmental objectives
- Material certificates including timber
- Reports on any pollution or environmental incidents that have occurred in relation your provision of services

* Wild West End guidance can be found at <https://www.wildwestend.london/>





We expect our suppliers and advisers to engage with the local community and minimise disruption from their activities. We consider the local community to be people living in, working in or visiting the boroughs of Westminster and Camden.

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.
- Operations on site shall be confined only to the contract area unless prior approval 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

We partner with selected charities to support their community programmes, 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 James Rogers, Community Manager, of any charitable activity relating to a project at James.Rogers@shaftesburycapital.com.

As part of our community reporting requirements, you may be asked for:

- Spend with local suppliers
- Number of local people (Westminster and Camden residents) employed
- Details of any local community engagement activity undertaken such as school visits, presentations, recruitment fairs etc.



Employees

As a minimum, we require all suppliers to adhere to all relevant human rights, employment and health and safety legislation and comply with standards and codes specific to their business.

All suppliers are requested to follow the requirements below, if applicable to their operations with Shaftesbury Capital.

Health and safety

- Provide adequate management systems and support to deliver Shaftesbury Capital's health, safety and wellbeing standards.
- Wherever possible, avoid using materials that may be harmful to health either during their manufacture, use or disposal. In all instances, the least harmful materials are to be used.
- Maintain appropriate permits to work and permissions for all work on our properties and our project sites.
- Maintain a record of and promptly report all near misses, accidents, incidents and concerns to us including any that fall within the definitions in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

Local employment

- Be proactive in offering local businesses and local people the opportunity to work as suppliers, contractors, apprentices and employees within our portfolio.
- Work with local job hubs or agencies to advertise roles and recruit local people, where appropriate.

Diversity

- Aim to recruit new people to the industry from underrepresented groups and offer access to career progression for all members of the workforce.
- Adopt an inclusive culture where all staff have equal opportunity.

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 payment of 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 and Human Trafficking 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.

As part of our employee reporting requirements, you may be asked for:

- Evidence of compliance with policies relating to employees.

Shaftesbury Capital PLC

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