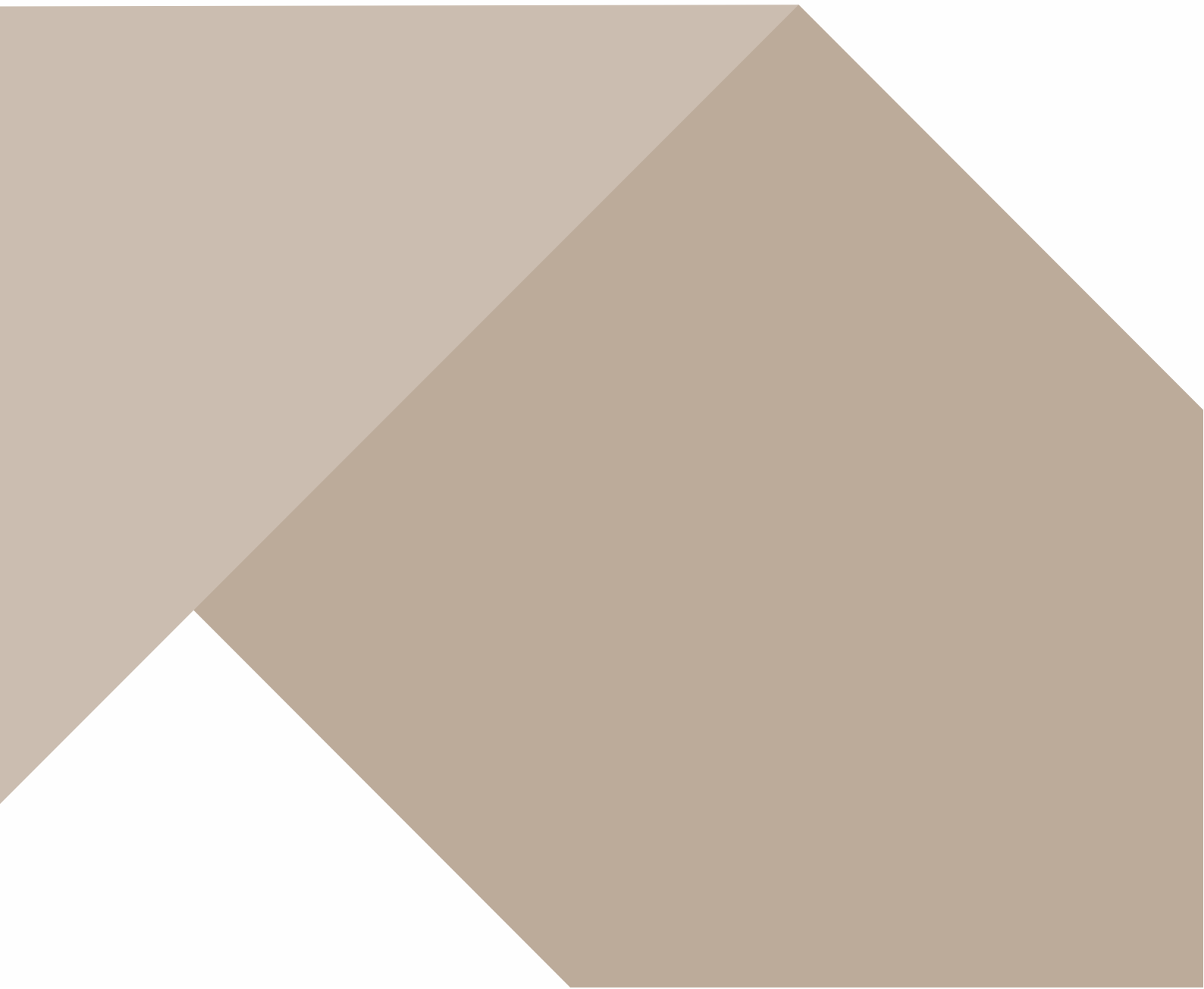


Sustainable Procurement Policy

January 2023



Contents

| | |
|---|----|
| 1. Preamble | 3 |
| 2. Foreword | 4 |
| 3. Introduction | 5 |
| 4. Background | 6 |
| 5. Key Strategic Aims and Fundamental Rules | 6 |
| 6. How Wheatley Group Will Identify and Monitor Sustainable Procurement | 8 |
| 7. Delivery of the Policy | 11 |

1. Preamble

We can produce information on request in large print, Braille, tape and on disk. It is also available in other languages. If you need information in any of these formats please contact us on Freephone 0800 479 7979.

如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979。

Si vous nous le demandez, nous pouvons vous remettre ces informations en d'autres langues, en braille ou sur cassette. Si vous souhaitez que ces informations vous soient fournies sous l'un de ces formats, contactez-nous en composant le 0800 479 7979.

چنانچه مایل باشید می‌توانید این مطالب را به فارسی یا زبان‌های دیگر و همچنین بریل و یا بر روی نوار کاست دریافت دارید. در صورت نیاز خواهشمندیم با شماره تلفن 0800 479 7979 با ما تماس بگیرید.

ਜੇ ਤੁਸੀਂ ਸਾਨੂੰ ਬੇਨਤੀ ਕਰੋ ਤਾਂ ਅਸੀਂ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾਵਾਂ, ਬ੍ਰੇਲ (ਨੋੜਹੀਣਾਂ ਲਈ ਭਾਸ਼ਾ) ਵਿੱਚ, ਜਾਂ ਟੇਪ ਉੱਪਰ ਦੇ ਸਕਦੇ ਹਾਂ। ਜੇ ਤੁਹਾਨੂੰ ਇਨ੍ਹਾਂ ਵਿੱਚੋਂ ਕਿਸੇ ਰੂਪ ਵਿੱਚ ਚਾਹੀਦੀ ਹੋਵੇ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 0800 479 7979 ਨੰਬਰ ਤੇ ਸੰਪਰਕ ਕਰੋ।

Na Pana/Pani życzenie możemy zapewnić te informacje w innych językach, alfabetem Braille'a lub na kasecie. Jeśli chciał(a)by Pan(i) uzyskać te informacje w którejś z tych form, prosimy skontaktować się z nami pod numerem telefonu 0800 479 7979.

Haddii aad na weydiisato waxaanu warbixintan kugu siin karaa iyadoo ku qoran luuqad kale, farta ay dadka indhaha la' akhriyaan ama cajalad ku duuban. Haddii aad jeclaan lahayd in warbixintan laguugu siiyo mid ka mid ah qaababkaas, fadlan nagala soo xidhiidh telefoonka 0800 479 7979.

По вашей просьбе данная информация может быть предоставлена на других языках, шрифтом Брайля или в аудиозаписи. Если вам требуется информация в одном из этих форматов, позвоните нам по номеру 0800 479 7979.

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| Approval body | <i>Wheatley Solutions Board</i> |
| Date of approval | <i>13th February 2023</i> |
| Review Year | <i>January 2024</i> |
| Customer engagement required | <i>No</i> |
| Trade union engagement required | <i>No</i> |
| Equality Impact Assessment | <i>No</i> |

The Wheatley Group will provide this policy on request at no cost, in large print, in Braille, on tape or in other non-written format, and in a variety of languages.

2. Foreword

Wheatley Group have agreed a strategic outcome to set the benchmark for sustainability by becoming carbon neutral by 2026 for our corporate operations. We spend approximately £206m each year on a diverse range of goods, services and works. It is critical therefore that this spending power is used to support key Group objectives. This policy has been developed to help Group meet its legal duties and to deliver its key strategic objectives in respect of sustainability.

Our strategic objectives are set out in our Sustainability Framework which should be read in conjunction with this policy document; the major aspects of which include reducing the carbon footprint of our housing stock by 4,000t per year and becoming a carbon neutral corporate entity by 2026. Using the breadth and depth of the Group's service, combined with our experience and skills, our aim is to be a catalyst for change in the housing sector and a contributor to national decarbonisation goals. Scottish Government have made clear commitments in respect of transitioning to a net zero emissions Scotland for the benefit of our environment, our people and our prosperity and have introduced climate change legislation (Climate Change (Emissions Reductions Targets) (Scotland Act 2019) that sets a target of net-zero for all greenhouse gases by 2045.

Critical to meeting our objectives is how we work with our partners, stakeholders, customers, and suppliers to prioritise sustainable solutions and embed sustainability in each of our decisions. Through this Sustainable Procurement Policy, we will seek to co-develop innovation in sustainability and set out how the contribution of our procurement spend to our overall sustainability goals will be monitored & verified.

This Sustainable Procurement Policy seeks to underpin how through procurement activities the Group meet not only regulatory obligations but the expectation of our funders and Government partnerships. Increasingly, access to new borrowing, successful tender outcomes, and achieving planning consents are linked to verifiable emissions reduction, environmental quality improvement and social benefit. This Sustainable Procurement Policy should therefore be viewed as aligned with the Group's Procurement Strategy.

3. Introduction

This Sustainability Procurement Policy has been prepared to recognise Wheatley Group's obligations under the Sustainable Procurement Duty and to support the key priorities for Group:

- Our Sustainable Finance Framework and Environmental Social Governance;
- Delivering Exceptional Customer Excellence;
- Making the most of our Homes and Assets including:
 - Reduce the output of CO2 emissions from our homes by at least 4,000 tonnes per year
 - Becoming Carbon Neutral from corporate activities by 2026;
- Changing Lives and Communities;
- Developing our Shared Capability;
- Enabling our Ambitions;
- Building Capability.

This policy will also contribute towards the Scottish Government's legally binding commitment to transition to a net zero emissions Scotland and our goals have been aligned to the National Outcomes which seek to reduce the local and global impact of our consumption and production, to value and enjoy our built environment and natural environment and enhance it for future generations, to have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.

This policy supports the commitment to sustainable procurement which is set out in the Wheatley Group's Procurement Strategy 2023. It is intended for all of those who are involved in or affected by Wheatley Group's procurement activities throughout our communities and beyond.

Wheatley Group's business-related activities have achieved Planet Mark certification as external verification of our transition to carbon neutral by 2026. The Group's benchmark corporate total carbon footprint was 2627t of CO2e as of year to date.

It is important therefore to re-emphasise how through the procurement of goods, services and works we can help meet the Group's business-related carbon emissions aims by 2026, as well as become an exemplar in sustainable transition. Removing annual CO2e will be challenging and requires careful consideration of what

we buy with support from our suppliers and staff to first consider how their procurement decisions contribute to this goal.

4. Background

Recent changes to procurement regulations and statutory duties are now embedded and public sector procurement has a greater role than ever before in supporting delivery of key social, economic and environmental outcomes. The Procurement Reform (Scotland) Act 2014 places sustainable and socially responsible procurement at the heart of the procurement process through:

General Duties as set out in Section 8 of the Act:

- A contracting authority must also comply with the sustainable procurement duty.
- A Sustainable Procurement Duty as set out in section 23. This requires a contracting authority prior to conducting a regulated procurement, to consider how in conducting the procurement process it can: “improve the economic, social and environmental wellbeing of the authority’s area’, ‘facilitate the involvement of SMEs, third sector bodies and supported businesses’ and ‘promote innovation’.
- A requirement to produce a Procurement Strategy and report performance against this annually.

The Group’s ambitious sustainability targets and a range of other initiatives will help its long-term aims of becoming carbon neutral, eliminating fuel poverty and reduce carbon emissions from its homes by at least 4000 tonnes per year. Procurement will support this ambition and our drive towards sustainability will be at the centre of our strategic goals and objectives.

5. Key Strategic Aims and Fundamental Rules

The Group’s Procurement Strategy incorporates key strategic objectives in relation to sustainability. Wheatley Group will through its Procurement activities ensure that we consider social, ethical, environmental and economic impacts in our procurement activity. To achieve this our key strategic aims are:

Transparency of Information

We will ensure transparency and promote a culture of decision making that prioritises our long term Sustainability goals, by;

- Adopt the use of the suite of Sustainable Procurement Tools, developed by the Scottish Government;
- Sustainability lead will maintain awareness of sustainability issues amongst staff and customers, to support effective procurement that complements our goals;

- Regularly challenge suppliers to show innovation and share information on their contribution to sustainable outcomes.
- Require within KPI periodic reporting of the upstream carbon emissions by suppliers, in relation to the whole-life emissions associated with their products and the volumes of commodities we procure (elaborated in part 5).

Increasing our efficiency and reducing emissions

Identifying opportunities to improve resource efficiency not only improves the sustainability performance of Wheatley Group but also makes rational and demonstrable financial sense. In addition, requirements for legislative compliance and performance monitoring around emissions and efficiencies of consumption provides additional impetus. Wheatley Group will include specific requirements of suppliers where appropriate; this is elaborated in section 5. Our aims that underpin these are;

- To promote engagement with our supply chain to address risks and opportunities for new innovative approaches;
- Identify, isolate and wherever possible remove wasteful processes or inefficiencies;
- Target direct emissions within our procurement of goods, services & works as a contribution to our overall Carbon Neutral goal.
- Aim to switch to carbon neutral capable fleet, where suitable electric, hybrid and hydrogen fuelled vehicles exist (i.e., have sufficient gross vehicle weight and range to meet our business need), by the end of 2026

Sustainable materials and resource consumption

The requirements will vary according to the commodity being procured but we expect our suppliers to demonstrate their compliance with good sustainability practice throughout the supply chain:

- Challenge our specifications and suppliers to make sure that sustainable solutions are at the forefront of the entire supply chain;
- Maximise relevant and proportionate environmental improvement in products and services procured including energy and water efficiency, carbon emissions reduction, waste minimisation, the use of recycled products & products derived from reclaimed or sustainable materials, minimisation and management of hazardous materials and emissions and where practical, enhancement of biodiversity and heritage;
- The Scottish Government's Just Transition 'A Fairer Greener Scotland' vision accords with our strategic objectives to improve homes, develop new skills and access to opportunities for our customers. As we tackle emissions there are opportunities to create lasting change to lives and livelihoods.

- In support of Scotland's Fair-Trade Nation status, we will look to demonstrate delivery of real and lasting impact by reducing poverty and improving the lives of people in the communities that we serve. We will also work with existing suppliers to increase the range and availability of fair and ethically traded goods and services where appropriate;
- We will seek assurances of fair and ethical practices in supply chains from our suppliers and will include conditions relating to the performance of the contract to ensure that the supplier complies with environmental, social and employment law.

Community Benefits

- Making procurement spend more accessible to local small businesses and third sector;
- We will require Suppliers to demonstrate Fair Work practices within their workforce and sub-contractors, as well as non-discrimination and promotion of Equality and Diversity;
- Community Benefits are built into all contracts where clear benefit(s) can be gained by our communities. Progress on the implementation of Community Benefits will be managed and maintained by the Groups Community Benefit team in line with the Group's Community Benefits Statement;
- Prevention of Modern Slavery – we will ensure Suppliers compliance with the Modern Slavery Act 2015. We shall implement this through the use of clauses in our contract conditions and is embedded within our procurement strategy;

6. How Wheatley Group Will Identify and Monitor Sustainable Procurement

Statement of Requirements

- Wheatley Group will require suppliers (where appropriate) to provide a baseline of whole life carbon emissions (WLCE) through a recognised life-cycle assessment;
- Demonstrate actions taken to reduce WLCE or opportunities for cost effective alternatives;
- Provide the resultant carbon baseline net difference, representative of the volume of procured.

We also seek to challenge suppliers to provide evidence of their consideration of:

- Upstream contribution to emissions reduction and sustainability in relation to production and transportation of materials and finished goods;
- How they have considered mitigation of environmental impact of their commodity, for example in terms of environmental contamination;

- Opportunities for 'circular economy' in practice, whereby waste can be reprocessed into new goods or commodities.

Wheatley Group will regularly challenge suppliers, not only in our tendering processes but throughout the contract to continually seek innovation and verification of how they are moving to implement sustainable solutions.

Sustainable Public Procurement Prioritisation Tool (“SPPPT”)

The Scottish Government have designed a public procurement prioritisation tool to bring a standard approach to the assessment of spend categories. This is a risk and opportunities matrix which can be utilised to identify relevant risks and opportunities, scope to improve and areas whereby Wheatley Group can influence the supply market. This is used to inform procurement strategies and market engagement strategies and clarify specific sustainable outcomes for contracts / commodities. Wheatley Group will embed the use of the SPPPT in the first stage of each procurement commodity scoping to provide a structure approach to:

- Prioritising commodities of spend based on sustainability risk and opportunity;
- Develop an understanding and create a focus on the priority commodities with the most risk or opportunity;
- Establish and undertake mitigating action for relevant risks and maximise and capture opportunities for sustainability;
- Implement the use of the sustainability test for all high, medium risk value frameworks and contracts, and
- Develop commodity strategies and contract requirements based on evidence and market engagement.

The outcomes of the SPPPT review will allow Wheatley Group to focus resources to generate sustainable outcomes, such as delivery of community benefits, reduction carbon footprint and improved fair working practices.

Sustainability Test

The sustainability test is a tool which has been designed by Scottish Government to support delivery of outcomes achieved when using the SPPPT. Wheatley Group will incorporate the Sustainability Test in the development of all commodity strategies where appropriate to identify specific risks and opportunities this will also be applied for appropriate individual contract strategies to identify actions and anticipated outcomes.

Lifecycle Impact Mapping

Wheatley Group will update the procurement processes to incorporate life cycle mapping approaches which consider the risks and opportunities for raw materials, manufacturing and logistics, use and disposal or end of life management. This approach will take cognisance of guidance from Scottish Government and will support the identification of economic, social and environmental impacts at each stage in the product or service delivered.

Scottish Government's Flexible Framework Self-Assessment Tool

To support continuous improvement, Wheatley Group will continue to use the Scottish Government's Flexible Framework Self-Assessment Tool to review current performance and identify action to improve sustainable procurement across the Group.

Staff training and knowledge of sustainable solution opportunities

Wheatley Group will implement and continually grow our training and knowledge opportunities for staff across the Group. To enhance awareness of sustainability, and also how each colleague can contribute to the stated aim of Wheatley Group to be Carbon Neutral but also to challenge suppliers and seek verification. We will embed learning through our Academy for all staff as well as seek external specialist training, for example through Zero Waste Scotland or in conjunction with exemplar suppliers that have demonstrated innovation.

Monitoring Performance

Wheatley Group will review and report on Sustainable Procurement Performance by developing and reviewing the following:

- Ongoing reporting to National Best Practice Indicators and the Procurement & Commercial Improvement Programme (PCIP), all in line with national standards;
- Sustainable Supplier Challenge outcomes and their contribution to our overall stated aims;
- Lifecycle Impact Mapping.

Fundamental Rules

There are some fundamental rules (in addition to all legal compliance and transparency governance) that shall apply in terms of achieving sustainable Procurement. These are:

- Wheatley Group is a mission led organisation; to make homes and lives better. Firmly within the scope of how this is achieved will be by providing 'Greener Homes and Greener Lives';
- Wheatley Group will prioritise carbon emissions reduction where appropriate and seek with support of suppliers to verify this;
- The Group will not contribute to environmental damage, therefore all use of materials, chemicals and any waste arising must not be detrimental to the immediate or wider environment.
- Wheatley Group will prioritise sustainable and low (or no) negative environmental impact;
- Commitment that Zero waste can go to landfill;
- Zero use of insecticides;
- Avoiding single use plastic – particularly in view of forthcoming UK legislation.

7. Delivery of the Policy

The aims and objectives of this Sustainable Procurement Policy will be developed and summarised within the Procurement Strategy as to how the Group will deliver each key theme including Community Benefits, Fair Working Practices, Developing Sustainable Supply Chains seeking assurances of fair and ethical practices.

Would you like more information?

Freephone 0800 479 7979

Visit: <http://www.wheatley-group.com/>

Email: procurement@wheatley-group.com

Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363