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BRUSH GROUP

Sustainable Procurement Policy

The BRUSH GROUP Sustainable Procurement Policy must be followed by anyone who works for or represents BRUSH, including directors, officers, employees, agents, distributors, and business associates working for or on behalf of any BRUSH entity, including, but not limited to BRUSH Group Ltd., together with its subsidiaries and affiliates ("the Group").

Employees must gain an understanding of the **Sustainable Procurement Policy** and ensure that its principles are fully applied in relevant areas of their job role.

Purpose of this policy

The purpose of this policy is to make clear to all BRUSH staff what is meant by Sustainable Procurement and how we propose to work towards achieving it. The policy applies to all BRUSH procurement activity and governs BRUSH's approach to procurement.

Sustainable Procurement – Definition

"A process whereby organisations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment."

Procuring The Future 2006

Sustainability can be incorporated into the whole procurement process assessing the need, defining the need, evaluating options, design and specifying, supplier selection, tender evaluation, post-contract management and supplier development.

Objectives

BRUSH Group's Sustainable Procurement objectives are:

- To comply with all relevant legislation and regulatory requirements.
- To promote sustainable awareness amongst suppliers and contractors.
- To procure sustainable products and services.
- To include sustainable criteria when evaluating offers from potential suppliers.
- To promote awareness of sustainable issues within the user community.
- To develop measures of our sustainable practice.
- To use the measures developed to monitor our sustainable practice with a view to seek continual improvement.
- To use the results of the monitored practice to benchmark our performance against similar organisations.
- To analyse the benchmarked performance to identify areas of practice for improvement.

Procurement Services will:

- Research and follow guidance relating to sustainability.
- Work with BRUSH staff to promote the use of sustainable products and suppliers.
- Include sustainability conditions and criteria in specifications and tender documents where relevant.
- Evaluate tenders with appropriate weight given to sustainability points.
- Encourage suppliers and contractors to include sustainability factors in the selection of their suppliers and the selection of goods or services for re-sale.

When Should Sustainability Criteria be Introduced

Sustainability criteria should be introduced into the procurement process at the earliest possible stage. Indeed, the first question in a sustainable assessment is 'Do I really need to purchase this item?'.

Developing Sustainable Options in the Market

Procurement Services practice will be aimed at motivating existing and potential suppliers to offer more sustainable products or services. This can best be achieved by specifying by functional performance rather than

technical specifications of known products. We will also engage with the various channels in markets to make clear the importance of sustainability in our evaluation of bids.

Supply Chain Management

The EU Consolidated Directive which was enacted into UK legislation as of 31st January 2006 allows the identification of social and environmental conditions related to the performance of the contract provided they are compatible with community law and are included in the contract notice. Environmental award criteria are permitted provided they are linked to the subject matter of the contract. Additionally, suppliers may be excluded from tender exercises for professional misconduct relating to environmental and social legislation or for non-compliance with environmental or social requirements in previous contracts.

This provides an opportunity to manage the supply chain once a contract or agreement has been let. A process for identifying the suppliers with most impact on the environment and social issues, and therefore, the most opportunity to influence and manage their supply chains will be developed. A programme for the management of those suppliers and their supply chains will also be developed.

Sustainable Goods and Services

We will research goods and services to identify which products or services are being produced from certified sustainable sources. We will encourage the development of sustainability certification schemes to increase the range of products covered.

Sustainability Criteria

Procurement Services will develop standard sustainability criteria which will form the core of sustainability criteria for particular goods or services. The baseline criteria will include:

- Carbon Emission data
- Energy data
- Supply Chain Management
- Distribution data
- Disposal data
- Social Sustainability data.

The criteria will be regularly reviewed to make sure that it continues to meet our objectives and continues to be challenging to suppliers and potential suppliers. The criteria will be applied to all tenders issued and included in the standard documentation created by Procurement services.

Developing Awareness in the User Community

We will develop awareness among the user community by arranging seminars, forums and other commodity focused groups which will include sustainability content.

Sustainability issues for particular commodities or services will be presented. A sustainable procurement section will be developed on the Procurement Services web- site, which will inter-link with the Procurement Services commodity pages.

Measures of Sustainability Practice

We will use the following measures of sustainability practice:

1. Record the sustainability criteria score of each tender bid.

2. Record the score of the winning bid against each element of the sustainability criteria.

We will develop other measures to monitor through research and liaison with other bodies including London Remade and DEFRA.

We will work with Sites and Facilities and BRUSH Partners to identify suitable indices of waste disposal and management, and actively participate in any BRUSH wide schemes to reduce our carbon emissions.

Delivery and Service Travel Plan

Travel plans are the requirement placed on organisations to develop plans to rationalise travel to their sites for both staff, and goods and services. The objective is to reduce the organisations carbon footprint.

Procurement Services will actively seek ways to assist in the development of a model for all recurrent deliveries to be transported to a hub and then for a single on-delivery using an electric vehicle.

This delivery and travel plan will make a major contribution to reduction in our carbon footprint.

Monitoring and Benchmarking of Performance

The sustainability performance indicators developed will be used to monitor BRUSH progress in meeting its sustainable procurement objectives. The results will be reviewed internally annually.

More important than our internal progress is how we as an organisation compare with other similar bodies. It is important to benchmark ourselves with others in our sector. Where it is clear that we can learn from others we will do so. We will seek out best practice and adopt and adapt as necessary.