



## Responsible Construction Policy

WH Smith PLC is a leading global travel retailer for travel essentials. We operate in 32 countries through more than 790 retail units in airports, railway stations, hospitals, motorway service stations. WHSmith sells convenience foods, travel accessories, books, stationery, magazines, newspapers, entertainment products, confectionery and health and beauty items.

The Responsible Construction Policy sets out our expectations for all design and construction activities carried out within our estate. WHSmith is committed to respecting human rights and the environment throughout our operations and supply chain, and ensuring that we design, source and build responsibly is a key component in delivering this commitment. Responsible Construction is about ensuring that operations to develop new stores and refurbish our existing estate are carried out with consideration, leave a minimal impact on the environment, and protect ourselves against rising costs by using less, finding better alternatives, reusing resources where possible and recycling them for other purposes.

This policy applies to all companies operating under the WH Smith PLC group structure including our joint venture businesses, and to WHSmith franchise operations. We encourage our suppliers and other business partners to adopt similar principles. The policy is owned by our Group Chief Executive and implementation and compliance is overseen by the Group Construction Director.

### **For construction activities, we make the following commitments:**

- We will select products and materials from construction suppliers who can demonstrate responsible sourcing credentials. WHSmith is committed to responsible sourcing practices, and in particular we will not tolerate modern slavery in our supply chain and requires our suppliers to have appropriate due diligence controls in place to prevent it. For more detail, you are directed to our Responsible Sourcing Standards.
- We will ensure forestry materials used in our construction operations come from recycled or FSC / PEFC certified sources. For more detail, you are directed to our Sustainable Forestry Policy.
- We will work to continue to reduce the amount of waste sent to landfill. As part of construction operations, we will facilitate sustainable waste management practices during our fit-out works through development of site waste management plans that support a target that at least 95% of waste materials are diverted from landfill, as well as avoiding waste associated with overordering of products and materials.
- We will use products and materials as efficiently as possible. The efficient use of material resources helps to reduce costs, whilst also minimising environmental impacts associated with raw material extraction, manufacture and supply chain. For our existing stores, there may be opportunities to make use of materials which are already there, rather than stripping out completely and starting from scratch.

Selecting standard products or systems which can be easily demounted, reconfigured or replaced allows for much more flexible use of our space and minimises disruption when there are changes in operational requirements. It can also help to reduce future refurbishment or refresh costs whilst maximising the design life of our fit-out.

- We will continue to identify goods and materials which reduce our operational energy usage, including continuing to use low energy lighting, continuing our use of aerofoil technology in our chiller cases to optimise air flow and reduce cold air spill, install controls equipment to optimise the operational efficiency of our heating & air conditioning systems, and continuing to trial the use of air cooled refrigeration in order to further reduce the GWP of our refrigeration equipment.
- Where appropriate we will ensure our construction site activities are registered with the Considerate Constructors Scheme to continue to improve their socially responsibility and will make sure every project adheres to a good neighbour ethos.
- We will specify materials with lower levels of harmful emissions, by ensuring our designers assess products such as paints, varnishes, coatings, adhesives, sealants and any composite wood products and specify low-VOC alternatives where available and practical.

**We will also continue to work with our supply chain in order to make progress in the following areas:**

- WHSmith are committed to working towards net zero by 2050, and we will work to ensure that we and our construction supply base have a clear roadmap in place to achieve this for our construction activity.
- We will encourage an environment of training and knowledge sharing internally and throughout our supply base so that the understanding of Responsible Construction grows, best practice is shared, and innovation is encouraged and quickly embedded into our operations.
- We will work with suppliers of goods and equipment to increase the usage of sustainable, recycled and recyclable materials within the construction products that are procured.
- We will encourage apprenticeships within our supply base to help the young, unemployed or those wishing to retrain in the construction industry.
- We will continue to promote diversity & inclusion within all areas of our supply base to encourage that there is no discrimination or bias within recruitment policies, in line with our own policies.
- We will measure our success against the criteria within this Responsible Construction policy as well as benchmarking to other industry leaders so that we can continue to learn and improve.

Approved by the WH Smith PLC Board: January 2025