



Sustainable Procurement Policy

Policy Statement

This policy outlines Turner Industries Group, L.L.C.'s expectations with regards to ethics, business integrity, health and safety, the environment, the community, and the economy. Although we do not manufacture goods, Turner recognizes that the products and services we purchase have inherent impacts on these aspects. We strive to align ourselves with partners within the supply chain who share our strategic vision and values and make significant and continual improvement in the sustainability of our investment decisions. This policy, in conjunction with Turner's Code of Ethics and Professional Conduct, shall serve as a basis for procurement decision making within our operation.

Purpose

The purpose of this policy is to:

- Identify Sustainability Factors
- Minimize the negative impacts on the environment
- Ensure our supply chain partners apply sustainable business practices
- Create a basis for sustainable investment decision making
- Identify Responsible Parties regarding Enforcement, Reporting, and Compliance

Sustainability Factors

Turner's procurement personnel shall consider the following factors when sourcing products and services.

Environmental factors include but are not limited to:

- Depletion of Natural Resources
- Production of Toxics and Pollutants
- Use of Renewable Energy
- Energy Efficiency and Consumption
- Waste Generation and Water Efficiency
- Recyclability
- Greenhouse gas emissions

Social and Economic factors include but are not limited to:

- Human Health impacts
- Worker Rights
- Moral and Ethical Standards
- Engaging Local, Minority Owned, and Small businesses whenever practical

Financial factors include but are not limited to:

- Total Cost of Ownership
- Leveraging Buying Power
- Long Term financial and market impacts
- Product quality and conformance

Turner conducts its business activities in a transparent manner with honesty, integrity, high ethical and moral standards, and respect for the environment as outlined in our Code of Ethics and Professional Conduct. We expect our suppliers to share this commitment and demonstrate best practices in meeting sustainability criteria while conducting their business.

Enforcement, Reporting, and Compliance

Turner Industries Group, L.L.C. Corporate Procurement Department is solely responsible for the enforcement and reporting of this policy. Purchasing personnel will undergo annual Ethics and Procurement training which encourages the utilization of best practices in sustainable procurement whenever practical.

The Corporate Procurement Department will annually collect and review sustainability data from its supplier network including but not limited to:

- CRR (Corporate Responsibility Reports)
- CSR (Corporate Sustainability Reports)
- GRI (Global Reporting Initiative) Standards
- Performance Reports including Environmental Management, Energy, Emissions, Climate (GHG), Materials, Waste, Water, Social, Economic, Market, and Utilization

To make a good faith report of behavior believed to be in violation or non-compliance of this policy, please contact the Turner Ethics and Compliance Committee at 1-800-288-6503.