



SUSTAINABILITY ACTION PLAN

Shaftesbury

2016-2017

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Note: The timeframe of 2016–2017 for implementation of the objectives and targets is consistent with the financial year, which is 1st October 2016 to 30th September 2017.

1 ENVIRONMENT

POLICY GOAL A:

Comply with Legal Requirements

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	PERSONNEL RESPONSIBLE
A1	Comply with all legal and regulatory requirements	<ul style="list-style-type: none"> Review legislation checklists to ensure are current Monitor environmental compliance on refurbishment and construction projects for 2016-17 using checklist 		<ul style="list-style-type: none"> RPS to liaise with: Shaftesbury Project Managers Managing agents
	Target	<ul style="list-style-type: none"> Achieve zero environmental non-compliance for 2016-17 	No. of non-compliances	All above

POLICY GOAL B:

Before purchase, environmental audits are conducted where appropriate

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	PERSONNEL RESPONSIBLE
B1	Undertake environmental/building health surveys of properties prior to purchase if appropriate and continue to invest only in 'brownfield' sites	<ul style="list-style-type: none"> Ensure environmental/building health surveys are used to screen properties before purchase of all properties, including risks from climate change, rising water tables and localised flooding Review acquisition checklist to expand to include risk assessment of other sustainability issues in line with GRESB 		<ul style="list-style-type: none"> Shaftesbury /RPS
	Target	<ul style="list-style-type: none"> Continue to achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment of portfolio 	% of brownfield	<ul style="list-style-type: none"> Shaftesbury

1 ENVIRONMENT CONTINUED

POLICY GOAL C:

Shaftesbury requires its consultants and contractors to adopt best environmental practice in the design and refurbishment of the Group's property portfolio.

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
C1	To operate in an environmentally sustainable manner throughout its activities and minimise the impact on climate change	<ul style="list-style-type: none"> Continue to refurbish existing buildings and promote the re-use of materials to reduce the need to introduce additional 'embodied' carbon Continue to assess on project by project basis whether renewable energy technologies can be economically incorporated into future projects, including heat recovery technology 		Shaftesbury
				Shaftesbury/Project Managers
	Targets	<ul style="list-style-type: none"> Achieve BREEAM Very Good for all new commercial developments 	BREEAM Score	Shaftesbury/SPPM
		<ul style="list-style-type: none"> Achieve BREEAM Very Good for domestic and non domestic refurbishment schemes of a capital value above £1 million Aim for an EPC Grade B rating on new build In all structural refurbishments of non listed buildings over £150,000 (excluding retail shell) that the existing EPC rating is improved to a C rating 	BREEAM Score EPC rating Increase in EPC rating for structural refurbishments	Shaftesbury/Project Managers Shaftesbury/SPPM Shaftesbury/Project Managers
C2	Efficient use of energy and water	<ul style="list-style-type: none"> Project managers to use Specification and Contractor's checklists for all projects over £150,000 and in excess of 3 months duration 		RPS/Project Managers
C3	Timber will be sourced, where possible, from well managed sources certified by third party certification bodies	<ul style="list-style-type: none"> Continue to maximise proportion of timber that is reused within projects and monitor for reporting purposes Contractors to retain all timber supply invoices and ensure that full chain of custody details are recorded RPS to collate information to identify proportion sourced from certified timber 		<ul style="list-style-type: none"> Project managers RPS to audit Project Managers to ensure contractors retain invoices RPS to collate
		Targets	<ul style="list-style-type: none"> Ensure that 100% of hardwood timber is sourced from a certified sustainable source Ensure that preferred suppliers demonstrate sourcing of a minimum of 70% of other types of timber from a certified sustainable source Aim for suppliers to source a minimum of 40% timber from an FSC certified source 	% of hardwood timber from a certified sustainable source % of other timber sourced from a certified sustainable source % of FSC timber sourced

1 ENVIRONMENT CONTINUED

POLICY GOAL C CONTINUED:

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
C4	Management and disposal of construction waste	<ul style="list-style-type: none"> Continue to monitor construction waste generated data for all projects above £150,000 and in excess of 3 months duration Project managers to ensure waste transfer notes retained as part of contract documentation 		<ul style="list-style-type: none"> Project managers RPS to audit
	Target	<ul style="list-style-type: none"> Aim to reuse or recycle 80% of non-hazardous demolition and construction waste by weight 	% of reused or recycled waste for projects	<ul style="list-style-type: none"> Project managers
C5	For projects of capital value over £150,000, and in excess of three months duration, Shaftesbury will sign up to Considerate Constructors Scheme. (NB. Schemes that only involve external repair and decoration will not be included)	<ul style="list-style-type: none"> Require all principal contractors that work on Shaftesbury schemes to register as a company to CCS Ensure all eligible schemes are signed up for 2016-2017 		<ul style="list-style-type: none"> Shaftesbury/ Project Managers/RPS RPS to audit
	Target	<ul style="list-style-type: none"> Achieve a minimum score of 30/50 (above satisfactory performance) on 100% of schemes audited 	% of schemes above 30/50	<ul style="list-style-type: none"> Shaftesbury/ Project Managers/RPS RPS to audit
C6	Improve biodiversity appropriate to the Group's urban location	<ul style="list-style-type: none"> Continue membership of Wild West End Improve biodiversity within existing portfolio through use of bird nesting boxes, green roofs and walls etc at appropriate locations Continue to research opportunities of supporting bees in the capital with appropriate use of planters and window boxes 		<ul style="list-style-type: none"> Shaftesbury Managing agents/ Project managers to implement
	Target	<ul style="list-style-type: none"> Increase number of biodiversity features throughout portfolio by minimum of 10% Develop 5 year plan in accord with Wild West End objectives 	No. of biodiversity features	<ul style="list-style-type: none"> Shaftesbury Managing agents/ Project managers to implement
C7	During construction the Company through its Project Managers will endeavour to minimise adverse impacts on the environment	<ul style="list-style-type: none"> Continue to provide all contractors with a copy of the Company Policy & Specification questionnaires etc. in tender documentation 		<ul style="list-style-type: none"> Project managers
		<ul style="list-style-type: none"> Continue to issue Induction Leaflet to all contractors working on portfolio 		<ul style="list-style-type: none"> Project managers
		<ul style="list-style-type: none"> Continue to ensure that there are minimal emissions to air and water given small scale and location of schemes in central London 		<ul style="list-style-type: none"> Project managers
Targets	<ul style="list-style-type: none"> Achieve zero reportable environmental incidents Ensure that a minimum of 80% water based paints are used to minimise pollution 	<ul style="list-style-type: none"> % schemes with zero incidents % of water based paints specified 	<ul style="list-style-type: none"> Project managers Project managers 	

1 ENVIRONMENT CONTINUED

POLICY GOAL D:

Shaftesbury requires its managing agents to comply with its sustainability policies

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
D1	Monitor and where possible reduce energy consumption and investigate opportunities for the use of renewable energy	<ul style="list-style-type: none"> Continue to monitor energy consumption in Shaftesbury Head Office and common parts of portfolio including Longmartin Increase proportion of definitive floor areas that are being assessed against energy consumption Implement step change findings from ESOS audits Obtain tenants consumption figures and collate for reporting purposes for whole buildings for REEB 2017 		<ul style="list-style-type: none"> Managing agents to collect data RPS to collate for reporting baseline
	Targets	<ul style="list-style-type: none"> Aim for solely owned common parts normalised data to not exceed 0.05tonne CO₂e/m² Aim for 3% absolute reduction in energy consumption across the portfolio against 2016 Aim for 5% like for like reduction in energy consumption across the portfolio against 2016 When renewing energy contracts throughout the portfolio purchase 'green tariff' electricity when costs are within 5% of brown energy Increase proportion of LED bulbs within common parts of managed portfolio and specifically for external lighting 	<p>Carbon per m² not to exceed target</p> <p>% absolute reduction across portfolio</p> <p>% like for like reduction across portfolio</p> <p>% new contracts placed on green energy tariffs</p> <p>% of LED bulbs within portfolio</p>	<p>Managing agents/ Shaftesbury</p> <p>Managing agents/ Shaftesbury</p> <p>Managing agents/ Shaftesbury</p> <p>Managing agents/ Shaftesbury</p> <p>Managing agents</p>
D2	Reduce Greenhouse Gas emissions within managed portfolio	<ul style="list-style-type: none"> Continue to monitor and report greenhouse gas emissions throughout the managed portfolio including the Head Office 		RPS/Shaftesbury
	Targets	<ul style="list-style-type: none"> Reduce Greenhouse Gas emissions by a rolling target of 5% from the baseline of 2015 by 2020 		RPS/Shaftesbury

1 ENVIRONMENT CONTINUED

POLICY GOAL D CONTINUED:

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
D3	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> Continue to investigate opportunities for including water meters in properties where Shaftesbury is responsible for water purchase 		Managing agents
	Targets	<ul style="list-style-type: none"> Monitor water use in Carnaby/Seven dials common parts – aim for 75% reporting of readings Increase coverage of water data collection in remainder of portfolio Aim to reduce like for like water consumption by 5% from 2016 Aim for usage at maximum of 0.5m³/m² Monitor water use for South Service yard in Chinatown – maintain constant usage 	<ul style="list-style-type: none"> % of coverage % of coverage % reduction Water use does not exceed 0.5m³/m² Water use does not exceed 2015-16 usage 	<ul style="list-style-type: none"> CBRE to collect data RPS to collate for reporting baseline Managing agents to collect data CBRE and Capita to collect data RPS to collate for reporting baseline CBRE and Capita to collect data RPS to collate for reporting baseline MJ Mapp
D4	Monitor and reduce waste from its managed properties including the Head Office	<ul style="list-style-type: none"> Maintain discussions with Westminster CC to identify residential recycling point within Chinatown Continue to monitor volume of paper purchased for use in Head Office 		Shaftesbury/MJ Mapp
	Targets	<ul style="list-style-type: none"> Divert from landfill minimum of 90% of tenant generated waste from Carnaby and Seven Dials and Longmartin Recycle/compost a minimum of 50% tenants waste at Carnaby and Seven Dials Increase use of compostable waste disposal facility Carnaby and Seven Dials Increase use of compostable waste disposal facility at Longmartin Maintain high rate of recycling at above 95% in Head Office 	<ul style="list-style-type: none"> % of tenants' waste diverted from landfill % of waste recycled % of waste composted % of waste composted % of waste recycled 	Shaftesbury/RPS Shaftesbury/Capita/CBRE CBRE Shaftesbury/CBRE Shaftesbury/CBRE Shaftesbury/RPS

1 ENVIRONMENT CONTINUED

POLICY GOAL D CONTINUED:

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2016-2017	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
D5	Ensure that contractors (including cleaners, maintenance personnel etc) comply with the policy with respect to the use of hazardous materials and materials from non-renewable resources;	<ul style="list-style-type: none"> • Issue updated induction Leaflet to all contractors working on portfolio throughout 2016- 2017 • Maintain documented audit trail of contractors that have received leaflet 		<ul style="list-style-type: none"> • Shaftesbury • Managing agents • Managing agents to keep records • RPS to audit
D6	Remove and dispose of hazardous materials e.g. asbestos in accordance with relevant legislation	<ul style="list-style-type: none"> • Ensure up to date asbestos register is held for managed portfolio • Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill 		<ul style="list-style-type: none"> • Managing agents to maintain asbestos register • Managing agents to collate hazardous waste data • RPS to audit
D7	Minimise emissions to air through appropriate management of buildings	<ul style="list-style-type: none"> • Continue rolling programme throughout the portfolio of maintenance of extractor ducts 		<ul style="list-style-type: none"> • Managing agents to keep records
D8	Minimise emissions to water through appropriate management of buildings	<ul style="list-style-type: none"> • Review effectiveness of grease traps for restaurants in Chinatown 		<ul style="list-style-type: none"> • MJ Mapp to commission audit

2 STAKEHOLDERS AND OUR LOCAL COMMUNITY

POLICY GOAL E:

Engage with advisors, suppliers, tenants and stakeholders to ensure we are aware and respond to their expectations

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2015-2016	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
E1	Disseminate the Policy to all the Company's staff, managing agents, contractors, and tenants and ensure that it is available to the public	<ul style="list-style-type: none"> Ensure Policy continues to be issued to all new commercial tenants as part of tenants pack Ensure Contractors' Leaflet is issued as part of all refurbishment contracts 		Managing agents Shaftesbury/Project Managers
E2	Provide appropriate awareness raising and engagement with tenants within the portfolio	<ul style="list-style-type: none"> Launch online Building Guide for commercial tenants including information on sustainability Promote the 'Close the Door' initiative with retail tenants in the portfolio 		Shaftesbury/ Managing agents Shaftesbury
	Targets	<ul style="list-style-type: none"> Increase number of subsidised two year membership of Sustainable Restaurant Association (SRA) for every new restaurant tenant Include requirement for data collection of energy consumption as part of 'green lease' for new commercial tenants Promote the 'close the door' initiative with retail tenants in the portfolio 	<ul style="list-style-type: none"> Number of new restaurant tenants registered with SRA Number of tenants collating data 	Shaftesbury Shaftesbury/ Managing agents Shaftesbury/ Managing agents
E3	Provide appropriate training and awareness to staff and principal suppliers	<ul style="list-style-type: none"> Undertake update awareness training for all personnel and key suppliers by November 2017 Continue to issue the following checklists to the Principal Suppliers: <ul style="list-style-type: none"> ~ Contractors Checklist ~ Specification Checklist ~ Legal Compliance Checklist 		RPS/Shaftesbury RPS/Shaftesbury
	Target	<ul style="list-style-type: none"> Require all contractors working on Shaftesbury refurbishment schemes to record the number of employees and subcontractors with Construction Skills Certification Scheme (CSCS) Cards 	% of subcontractors with CSCS cards	Project Managers
E4	Work with other local occupiers, local authorities and the Mayor's office to investigate and promote solutions to reducing air pollution in central London	<ul style="list-style-type: none"> Continue as active associate member in New West End Company (NWEC) in its efforts to lobby to improve air quality in central London Review findings of consolidation study and extend to other villages 		Shaftesbury/Managing agents

2 STAKEHOLDERS AND OUR LOCAL COMMUNITY

POLICY GOAL F:

Engage with advisors, suppliers, tenants and stakeholders to disseminate the Group's corporate responsibility policies and requirements

NUMBER	MANAGEMENT OBJECTIVE	ACTIONS 2015-2016	RESPONSIBILITY
F1	The Policy will be reviewed on an annual basis and objectives and targets will be set.	<ul style="list-style-type: none"> Review Policy in August 2017 for approval at the Board meeting in September 2017 Draft and implement Supplier Code of Conduct 	RPS/Shafesbury
F2	The Company will monitor and report publicly on its performance	<ul style="list-style-type: none"> Report performance against Action Plan on Company website Include summary of performance in Annual Report 2017 Prepare report in accord with GRI Guidelines G4 for reporting 	RPS/Shafesbury
F3	The Company will maintain its ongoing engagement with institutional investors and benchmarking indices	<ul style="list-style-type: none"> Engage with key investors and other benchmarking agencies Continue membership of Better Building Partnership (BBP) Remain as signatory to UN Global Compact 	Shafesbury/RPS
	Targets	<ul style="list-style-type: none"> Remain in FTSE4Good Index for 2016-2017 Participate in GRESB survey and maintain 4 Green Star status Participate in Carbon Disclosure Project and improve score 	Score in index Score in index Score in index Shafesbury/RPS

2 STAKEHOLDERS AND OUR LOCAL COMMUNITY

POLICY GOAL G:

Shaftesbury is committed to investing in its local community

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2015-2016	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
G1	Maintain membership of the London Benchmarking Group and continue to align its charitable giving and community involvement to its chosen areas of investment in the heart of London's West End.	<ul style="list-style-type: none"> Ongoing financial support to key charities and community support for 2016-2017 		Shaftesbury
	Target	<ul style="list-style-type: none"> Continue to work with charity partners in 2017 	<ul style="list-style-type: none"> Value of support as per LBG 	Shaftesbury
G2	Shaftesbury will continue to engage with the local community through the provision of advice and resources.	<ul style="list-style-type: none"> Ongoing support to nominated charities through staff involvement for 2016-2017 Continue to provide office space for small charities within portfolio Continue to support and provide facilities for up and coming artists and fashion designers Continue to work with statutory bodies through financial support to improve the local environment and public realm e.g. lighting projects, pavement maintenance etc. 		Shaftesbury

POLICY GOAL H:

Shaftesbury will conduct its business with integrity and in an open and ethical manner and require the same standards throughout its supply chain

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2015-2016	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
H1	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none"> Continue to maintain existing regular liaison between tenants, managing agents & Shaftesbury 		Shaftesbury surveyors/Managing agents
	Target	<ul style="list-style-type: none"> Repeat tenant surveys at Seven Dials and Carnaby Undertake tenant surveys at Longmartin 	<ul style="list-style-type: none"> % of responses % of responses 	CBRE
H2	Comply with the Prompt Payment Code	<ul style="list-style-type: none"> Monitor payment times 		Shaftesbury
	Target	<ul style="list-style-type: none"> Suppliers to be paid within 30 days 	<ul style="list-style-type: none"> % of suppliers paid within time frame 	Shaftesbury
H3	Promote principles of the UNGC down the supply chain	<ul style="list-style-type: none"> Draft Supplier Code for first tier suppliers to promote UNGC principles 		Shaftesbury/Managing agents/Project managers
H4	Work against corruption in all its forms in accord with the anti corruption principle of the UN Global Compact	<ul style="list-style-type: none"> Monitor implementation of Anti Bribery Policy and engage with supply chain in its implementation 		Shaftesbury

3 EMPLOYEES

POLICY GOAL I:

Shaftesbury recognises the importance of the welfare of its employees

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2015-2016	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
I1	Fully comply with all the requirements of the Health & Safety at Work Act 1974 etc. for employees and those that may be affected by its activities	<ul style="list-style-type: none"> Review Health and Safety Policy for Head Office and portfolio Ensure health & safety induction training is being undertaken by contractors for 100% site staff including use of contractor induction leaflets 		<ul style="list-style-type: none"> Shaftesbury Project Managers RPS to audit
	Targets	<ul style="list-style-type: none"> Achieve zero reportable accident/incidents throughout 100% of the refurbishment schemes Achieve zero reportable accident/incidents throughout 100% of the managed portfolio Record absenteeism within Shaftesbury Head Office Ensure findings of Considerate Constructors Scheme are implemented at 100% of projects 	<ul style="list-style-type: none"> Number of prohibition/enforcement notices received Number of prohibition/enforcement notices received Number of days absent/employee % of Schemes with satisfactory scores above 30/50 	<ul style="list-style-type: none"> Project managers Managing agents Shaftesbury Project Managers

3 EMPLOYEES

POLICY GOAL J:

Shaftesbury is committed to supporting the Universal Declaration of Human Rights and respects the human rights of its employees through providing equal opportunity for all its employees and potential employees and expects its principal advisors and suppliers to do the same

NUMBER	OBJECTIVE	MANAGEMENT ACTIONS 2015-2016	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
J1	Comply in all respects with key applicable employment legislation and adhere to the Principles of the RICS Quality Mark	<ul style="list-style-type: none"> Review strategy to ensure approach to internal staff management & recruitment to ensure compliance with equal opportunities policy and diversity complies with Principles of the RICS Quality Mark Continue active involvement with Real Estate Balance including membership of one of task groups 		Shaftesbury
	Targets	<ul style="list-style-type: none"> Monitor staff turnover Monitor average length of service Monitor relevant diversity metrics including % of women in key positions 	<ul style="list-style-type: none"> % of leavers as part of total staff number per year Number of years of service per employee % of women in board/senior/management positions 	<ul style="list-style-type: none"> Shaftesbury Shaftesbury
J2	Principal suppliers to ensure that an appropriate system for remuneration and benefits in compliance with the defined living wage is in place within the portfolio	<ul style="list-style-type: none"> Work with managing agents and project managers to monitor scale of remuneration for all full time personnel working within the portfolio Work with managing agents and project managers to monitor scale of remuneration for contractors working on the portfolio 		Shaftesbury/ Managing agents/ Project managers
	Targets	<ul style="list-style-type: none"> All new contracts agreed within the managed portfolio to pay London Living wage 	% of contracts	
J3	Principal suppliers to ensure compliance with the Modern Slavery Act within the supply chain	<ul style="list-style-type: none"> Continue to work with tier 1 suppliers in ensuring compliance with the Modern Slavery Act 		Shaftesbury/All Tier 1 suppliers