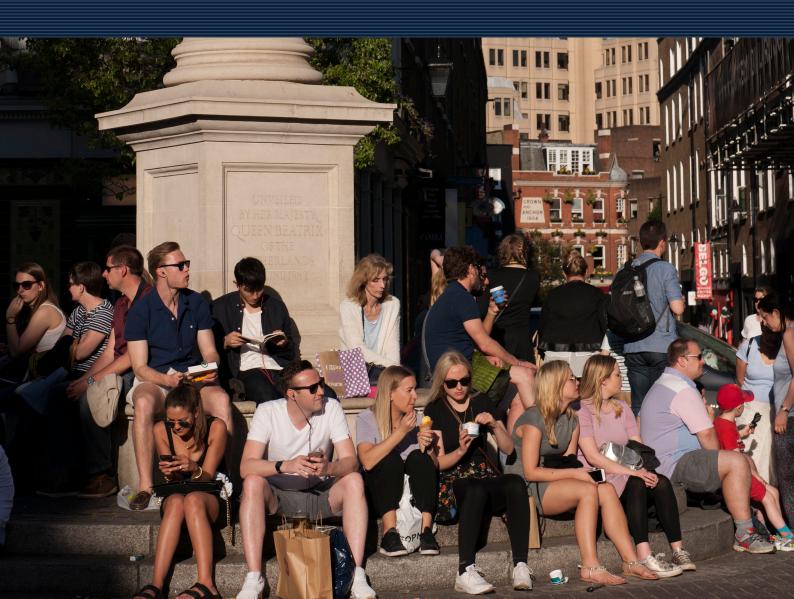
Sustainability Action Plan 2017-2018



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1.0 Strategic goal: environmentally sustainable reuse and management of buildings

Policy goal A: Comply with legal requirements

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
A1	Comply with all legal and regulatory requirements	 Review legislation checklists to ensure are current. 		RPS to liaise with: • Shaftesbury
		 Monitor environmental compliance on refurbishment and construction projects for 2017-18 using checklist 		Project ManagersManaging agents
	Target	 Achieve zero environmental non- compliance for 2017-18 	No. of non-compliances	All above

Policy goal B: Before purchase, environmental audits are conducted where appropriate

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE	RESPONSIBILITY
B1	Undertake environmental/ building health surveys of properties prior to purchase if appropriate and continue to invest only in `brownfield' sites	 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 in line with GRESB and BBP as appropriate to portfolio. 		Shaftesbury/RPS
	Target	 Continue to achieve 100% use and regeneration of `brownfield' land during expansion and refurbishment of portfolio. 	% of brownfield	Shaftesbury

Policy goal C: Work with other stakeholders to investigate and promote solutions to reduce air pollution in the West End

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE	RESPONSIBILITY
C1	Work with other local land owners, occupiers, local authorities and the Mayor's office to investigate and promote solutions to reducing air pollution in central London	 Implement Air Quality Strategy Continue to work with tenants in Carnaby to coordinate deliveries to the managed portfolio through partnership with Anglo. 		Shaftesbury/ Managing agents

Policy goal D: 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 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
D1	To operate in an environmentally sustainable manner throughout its activities and minimise the impact on climate change through use of BREEAM and increasing the EPC rating of properties being refurbished	 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
		• Encourage tenants to use the Better Building Partnership best practice fit out guide.		Shaftesbury/RPS
	Targets	 Achieve BREEAM Very Good for all new commercial developments. Achieve BREEAM Very Good for domestic and non domestic refurbishment schemes of a capital value above £1 million 	BREEAM Score BREEAM Score	Shaftesbury/SPPM Shaftesbury/ Project Managers
		 Aim for an EPC Grade B EPC 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. 	EPC rating EPC rating of C for structural refurbishments	Shaftesbury/SPPM Shaftesbury/ Project Managers
D2	Efficient use of energy and water	 Project managers to use revised Specification and Contractor's checklists for all projects over £150,000 and in excess of 3 months duration. 		RPS/Project Managers
D3	Source timber from well managed sources, certified by third party certification schemes	 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. 		 Projectmanagers RPS to audit ProjectManagers to ensure contractors retain invoices
		• RPS to collate information to identify proportion sourced from certified timber		• RPS to collate
	Targets	 Ensure that 100% of hardwood timber is sourced from a certified sustainable source. Ensure that preferred suppliers demonstrate sourcing of a minimum of 90% of other types of timber from a certified sustainable source. Aim for suppliers to source a minimum of 70% timber from 	% of hardwood timber from a certified sustainable source % of other timber sourced from a certified sustainable source % of FSC timber sourced	 Shaftesbury / ProjectManagers RPS to audit Shaftesbury / ProjectManagers RPS to audit Projectmanagers RPS to audit

Policy goal D continued

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
D4	Management and disposal of construction waste	• Continue to monitor construction waste generated data for all projects above £150,000 and in excess of 3 months duration.		ProjectmanagersRPS to audit
		• Project managers to ensure waste transfer notes retained as part of contract documentation.		
	Target	 Aim to reuse or recycle 90% of non-hazardous demolition and construction waste by weight 	% of reused or recycled waste for projects	Project managers
D5	Improve biodiversity appropriate to the Group's	• Continue membership of Wild West End		• Shaftesbury
	urban location	 Implement five year Biodiversity Strategy. 		 Managing agents/ Project managers to implement
		 Continue to research opportunities of supporting bees in the capital with appropriate use of planters and window boxes. 		
	Target	• Increase area of biodiversity features by 10% throughout portfolio by focussing on Seven Dials, Chinatown and Soho.	Area of biodiversity features	 Shaftesbury Managing agents/ Project managers to implement
		 Implement green roof installation at a minimum of two locations 		·
		• Investigate opportunity for parklet		
D6	During construction the Company through its Project Managers will endeavour to minimise adverse impacts on the environment	• Continue to provide all contractors with a copy of the Company Policy & Specification questionnaires etc. in tender documentation		Project managers
		 Continue to issue Induction Leaflet to all contractors working on portfolio. 		Project managers
		• Continue to ensure that there are minimal emissions to air and water given small scale and location of schemes in central London		Project managers
		 Monitor energy and water use on site throughout the life of the project. 		Project managers
	Targets	 Achieve zero reportable environmental incidents 	% schemes with zero incidents	Project managers
		 Ensure that a minimum of 80% water based paints are used to minimise pollution. 	% of water based paints specified	Project managers

Policy goal E: Shaftesbury requires its managing agents to comply with its sustainability policies

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
E1	Maximise use of landlord procured renewable energy	• Continue to monitor energy consumption in Shaftesbury Head Office and common parts of portfolio		Managing agents to collect data RPS to collate for
	and reduce energy consumption in common parts	 Increase proportion of definitive floor areas that are being assessed against energy consumption. Implement step change findings from ESOS audits 		reporting baseline
		 Obtain tenants consumption figures and collate for reporting purposes for whole buildings for REEB 2018. 		
	Targets	 Aim for wholly owned common parts normalised data to not exceed 0.05tonne C0₂e/m² 	Carbon per m ² not to exceed target	Managing agents/ Shaftesbury
		 Aim for 3% absolute reduction in landlord controlled energy consumption against 2017. 	% absolute reduction across portfolio	Managing agents/ Shaftesbury
		 Aim for 5% like for like reduction in landlord controlled energy consumption against 2017. 	% like for like reduction across portfolio	Managing agents/ Shaftesbury
		• When renewing energy contracts throughout the portfolio purchase 'green tariff' electricity when costs are within 5% of brown energy.	% new contracts placed on green energy tariffs	Managing agents/ Shaftesbury
		 Increase proportion of LED bulbs within common parts of managed portfolio and specifically for external lighting. 	% of LED bulbs within portfolio	Managing agents
2	Reduce Greenhouse Gas emissions within managed portfolio	 Continue to monitor and report greenhouse gas emissions for landlord controlled portfolio including the Head Office. 		RPS/Shaftesbury
	Targets	• Reduce Greenhouse Gas emissions by a rolling target of 5% from the baseline of 2015 by 2020.		
E3	Monitor and, where possible, minimise water consumption	• Continue to investigate opportunities for including water meters in properties where Shaftesbury is responsible for water purchase.		Managing agents
	Targets	 Monitor water use in Carnaby/ Seven dials common parts – aim for 75% reporting of readings. 	% of coverage	 CBRE to collect data RPS to collate for reporting baseline
		 Increase coverage of water data collection in remainder of wholly owned portfolio 	% of coverage	 Managing agents to collect data
		• Aim to reduce like for like water consumption by 5% from 2017	% reduction	 CBRE and MJ Mapp to collect data RPS to collate for reporting beenling
		• Aim for usage at maximum of 0.5m3/m2	Water use does not exceed 0.5m³/m²	 CBRE and MJ Mapp to collect data RPS to collate for
		 Monitor water use for South Service yard in Chinatown – maintain constant usage 	Water use does not exceed 2016-2017 usage	 RPS to collate for reporting baseline MJ Mapp

Policy goal E continued

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
E4	Monitor and reduce waste from its managed properties including the Head Office	 Maintain discussions with Westminster CC to identify residential recycling point within Chinatown. 		Shaftesbury/ MJ Mapp
	Targets	• Divert from landfill minimum of 90% of tenant generated waste from Carnaby and Seven Dials.	% of tenants' waste diverted from landfill	Shaftesbury/CBRE
		• Recycle a minimum of 50% tenants waste at Carnaby and Seven Dials	% of waste recycled	CBRE
		• Increase use of compostable waste disposal facility Carnaby and Seven Dials to 20%	% of waste composted	Shaftesbury/CBRE
		Aim for minimum of 30% recycling at Chinatown and install compactor.Research use of biodigester	% of waste recycled	МЈ Марр
		• Maintain high rate of recycling at above 95% in Head Office	% of waste recycled	Shaftesbury/RPS
E5	Ensure that contractors (including cleaners, maintenance personnel etc) comply with the policy with respect to the use of hazardous materials	 Issue updated induction Leaflet to all contractors working on portfolio throughout 2017-2018. Maintain documented audit trail of contractors that have received leaflet 		 Shaftesbury Managing agents Managing agents to keep records
	and materials from non- renewable resources;	leaflet.		• RPS to audit
E6	Remove and dispose of hazardous materials e.g. asbestos in accordance with relevant legislation	 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 		 Managing agents to maintain asbestos register Managing agents to collate hazardous waste data
E7	Minimise emissions to air through appropriate management of buildings	 Continue rolling programme throughout the portfolio of maintenance of extractor ducts. 		 RPS to audit Managing agents to keep records
		 Progress boiler upgrades where viable following ESOS recommendations. Commission survey of remainder of portfolio to identify boilers that could be updated. 		
E8	Minimise emissions to water through appropriate management of buildings	• Undertake discussions with tenants re. findings of review of effectiveness of grease traps for restaurants in Chinatown	;	• МЈ Марр

2.0 Strategic goal: Engage with our stakeholders

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

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
F1	Disseminate the Policy to all the Company's staff, managing agents,	• Ensure Policy continues to be issued to all new commercial tenants as part of tenants pack.		Managing agents
	contractors, and tenants and ensure that it is available to the public	• Ensure Contractors' Leaflet is issued as part of all refurbishment contracts		Shaftesbury/ Project Managers
F2	Provide appropriate awareness raising and engagement with tenants	 Promote online Building Guide for commercial tenants including information on sustainability. 		Shaftesbury/ Managing agents
	within the portfolio	 Ensure Sustainability Leaflet for residential tenants is included in all new letting packs 		Shaftesbury/ Managing agents
	Targets	 Include SRA fit out guide within tenants letting pack. 	• Number of new restaurant tenants using the guide	Shaftesbury
		 Include requirement for data collection of energy consumption as part of 'green lease' for new commercial tenants. 	• Number of tenants collating data	Shaftesbury/ Managing agents
F3	Provide appropriate training and awareness to staff and principal	 Undertake update awareness training for all personnel and key suppliers by November 2018. 		RPS/Shaftesbury
	suppliers	• Continue to issue the following checklists to the Principal Suppliers:		RPS/Shaftesbury
		– Contractors Checklist – Specification Checklist – Legal Compliance Checklist		
	Target	• 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
F4	For projects of capital value over £150,000, and in excess of three months duration, Contractors will sign up to Considerate Constructors Scheme. (NB. Schemes that only involve external repair and decoration will not be included)	• Require all principal contractors that work on Shaftesbury schemes to register as a company to CCS.		 Shaftesbury/ Project Managers/RPS RPS to audit
		• Ensure all eligible schemes are signed up for 2017-2018.		
	Target	• Achieve a minimum score of 30/50 (above satisfactory performance) on 100% of schemes audited.	% of schemes above 30/50	 Project Managers/RPS RPS to audit

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

NUMBER	MANAGEMENT OBJECTIVE	ACTIONS 2017-2018		RESPONSIBILITY
G1	The Policy will be reviewed on an annual basis and objectives and targets will	 Review Policy in August 2018 for approval at the Board meeting in September 2018. 		RPS/Shaftesbury
	be set.	 Monitor use of Supplier Code of Conduct. 		
G2	The Company will monitor and report publicly on its	• Report performance on Company website,		RPS/Shaftesbury
	performance	 Include summary of performance in Annual Report 2017 		
		 Prepare report in accord with EPRA Sustainability Best Practice Recommendations 		
G3	The Company will maintain its ongoing engagement with institutional investors and benchmarking indices	 Engage with key investors and other benchmarking agencies. 		Shaftesbury/RPS
		• Continue membership of Better Building Partnership (BBP).		
		• Remain as signatory to UN Global Compact		
	Targets	• Remain in FTSE4Good Index for 2017-2018.	Score in index	Shaftesbury/RPS
		 Participate in GRESB survey and maintain 4 Green Stars rating 	Score in index	
		 Participate in Carbon Disclosure Project and improve score 	Score in index	

3.0 Strategic goal: Invest in our community

Policy goal H: Shaftesbury is committed to investing in its local community

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE	RESPONSIBILITY
H1	Continue membership of the London Benchmarking	• Ongoing financial support to key charities and community support for 2017-2018.	Value of support as per LBG	Shaftesbury
H2	Support local community groups and be proactive in identifying and working with charitable and other organisations	• Form Community Investment Committee.		Shaftesbury
		 Continue to work with charity partners in 2018 		Shaftesbury
		• 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

4.0 Strategic goal: Fair and ethical framework for employees including supply chain

Policy goal I: 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 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
11	Provide the standards of accommodation and services that have been agreed	 Continue to maintain existing regular liaison between tenants, managing agents & Shaftesbury. 		Shaftesbury surveyors/ Managing agents
	Target	 Repeat tenant surveys at Seven Dials and Carnaby in 2018. 	% satisfaction rate	CBRE
12	Comply with the Prompt Payment Code	• Monitor payment times		Shaftesbury
	Target	 Suppliers to be paid within 30 days 	% of suppliers paid within time frame	Shaftesbury
13	Promote principles of the UN Global Compact down the supply chain	• Monitor implementation of Supplier Code for first tier suppliers to promote UNGC principles		Shaftesbury/ Managing agents/ Project managers
14	Work against corruption in all its forms in accord with the anti corruption principle of the UN Global Compact and ensure compliance with anti bribery and corruption policy.	• Monitor implementation of Bribery and Anti- Corruption Policy and engage with supply chain in its implementation		Shaftesbury

Policy goal J: Shaftesbury recognises the importance of the welfare of its employees

NUMBER	OBJECTIVES	MANAGEMENT ACTIONS 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
J1	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 and minimise risk of reportable health and safety accidents/incidents throughout the portfolio	• Review Health and Safety Policy for Head Office and portfolio.		 Shaftesbury
		• Ensure health & safety induction training is being undertaken by contractors for 100% site staff including use of contractor induction leaflets.		 Project Managers RPS to audit
	Targets	• Achieve zero reportable accident/ incidents on refurbishment sites throughout 100% of the portfolio.	Number of prohibition/ enforcement notices received	Project managers
		• Achieve zero reportable accident/ incidents throughout 100% of the managed portfolio.	Number of prohibition/ enforcement notices received	Managing agents
		 Record absenteeism within Shaftesbury Head Office. 	Number of days absent/ employee	Shaftesbury
		 Continue to improve performance for next assessment against Fairplace Award in 2020. 	% score at next review	Shaftesbury

Policy goal K: 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 2017-2018	KEY PERFORMANCE INDICATOR	RESPONSIBILITY
K1	Comply with employment legislation and best practice including diversity	• Ensure approach to internal staff management & recruitment to ensure compliance with equal opportunities policy and diversity complies with Principles of the RICS Quality Mark.		
	Targets	• Monitor staff turnover.	% of leavers as part of total staff number per year	Shaftesbury
		Monitor average length of service	Number of years of service per employee	Shaftesbury
		 Monitor relevant diversity metrics including % of women in key positions 	% of women in board/ senior/ management positions	Shaftesbury
		• Record number of staff with flexible working/part time arrangements.	% of staff	Shaftesbury
К2	Invest in training and development of our employees.	• Ensure approach to internal staff management & recruitment to ensure compliance with equal opportunities policy and diversity complies with Principles of the RICS Quality Mark.		
		 Undertake Personal Development Reviews for all personnel and record training. 	Days training	Shaftesbury
K3	Ensure London Living Wage is paid through the supply chain where within our control.	• Work with managing agents and project managers to monitor scale of remuneration for all full time personnel working within the portfolio		Shaftesbury/ Managing agents/ Project managers
		• Work with managing agents and project managers to monitor scale of remuneration for contractors working on the portfolio.		
	Target	• All new contracts agreed within the managed portfolio to pay London Living wage	% of contracts	Shaftesbury/ Managing agents
		• Achieve accreditation from London Living Wage Foundation		Shaftesbury
К4	Principal suppliers to ensure compliance with the Modern Slavery Act within the supply chain	• Continue to work with tier 1 suppliers in ensuring compliance with the Modern Slavery Act.		Shaftesbury/All Tier 1 suppliers
	Target	 Increase awareness of site management teams through: 		Shaftesbury
		- Use of leaflets and posters at sites e.g. Stronger2gether		
		Consider sign up to GLAA Construction Protocol		
		• Investigate joining Sustainability School and encourage membership of first tier and second tier project management teams.		