

Shaftesbury PLC

Corporate Social Responsibility

Action Plan 2003/2004

Overall Policy Goals

Policy Goal A: Disseminate the Environmental, Social and Community Policy

Number	Objectives	Targets 2003/04	Personnel Responsible*
A1.	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"> Undertake update awareness training of all personnel and key suppliers by September 2003 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Identify 10 largest suppliers and send a copy of the Policy and request a copy of their policies by September 30th 2003 	Brian Bickell

Policy Goal B: Review the Policy on an annual basis and report on the Company's performance

Number	Objective	Targets 2003/04	Personnel Responsible
B1.	The Policy will be reviewed on an annual basis and objectives and targets will be set.	<ul style="list-style-type: none"> Set objectives and targets for 2003/04 Review Policy May 2004 for approval at the Board meeting in July 2004 	RPS/Shaftesbury
B2	The Company will monitor and report publicly on its performance	<ul style="list-style-type: none"> Report interim performance against Action Plan and report on Company website 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Include summary of performance in Annual Report 2003/04 	
		<ul style="list-style-type: none"> Undertake annual audit in August 2003/04 to monitor performance against the Policy and Action Plan 	

Note: The timeframe of 2003/2004 for implementation of the objectives and targets is consistent with the financial year of end of September 2003 to end September 2004.

*** RPS = RPS Consultants, the Company's CSR advisor**

Environmental Responsibility

Policy Goal C: Comply with Legal Requirements

Number	Objectives	Targets 2003/04	Personnel Responsible
C1.	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 2003/04 using checklist 	RPS to liase with: <ul style="list-style-type: none"> • Shaftesbury Project Managers • Project Managers • Managing agents
		<ul style="list-style-type: none"> • Achieve zero non- compliance for 2003/04 	All above

Policy Goal D: Prior to purchase, environmental audits are conducted where appropriate

Number	Objectives	Targets 2003/04	Personnel Responsible
D1.	Undertake environmental/building health surveys of properties prior to purchase if appropriate	<ul style="list-style-type: none"> • Identify screening process for selecting properties which require environmental/building health surveys 	<ul style="list-style-type: none"> • RPS to draft • Shaftesbury to approve for use
		<ul style="list-style-type: none"> • Select recognised consultant to undertake the survey 	Shaftesbury

Policy Goal E: Minimise environmental impacts during management of properties

Number	Objectives	Targets 2003/04	Personnel Responsible
E1.	Monitor and where possible reduce energy consumption	<ul style="list-style-type: none"> Continue to monitor energy consumption in Shaftesbury Head Office and common parts of portfolio 	<ul style="list-style-type: none"> Managing agents to collect data RPS to collate for reporting baseline
		<ul style="list-style-type: none"> Investigate feasibility of purchase of "green tariff" electricity for Head office 	<ul style="list-style-type: none"> Shaftesbury
		<ul style="list-style-type: none"> Set target for 2003/04 	
		<ul style="list-style-type: none"> Investigate feasibility of purchase of "green tariff" electricity for common parts 	<ul style="list-style-type: none"> Managing agents
		<ul style="list-style-type: none"> Set target for 2003/04 	
<ul style="list-style-type: none"> Achieve 100% use of long life light bulbs within common parts of managed portfolio by August 2004 	<ul style="list-style-type: none"> Managing agents 		
E2.	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> Complete installation of meters in Carnaby/Seven Dials part of portfolio by August 2004 	<ul style="list-style-type: none"> Hodnett Martin Smith to collect data
		<ul style="list-style-type: none"> Monitor water consumption 	<ul style="list-style-type: none"> RPS to collate for reporting baseline

Number	Objectives	Targets 2003/04	Personnel Responsible
E3.	Monitor and reduce waste from its managed properties	<ul style="list-style-type: none"> • Monitor progress of Chinatown waste management plan for 2003/04 	<ul style="list-style-type: none"> • Shaftesbury/National Arts Council to liaise with Westminster • Managing agents to implement
		<ul style="list-style-type: none"> • Further discussion with Westminster to investigate introduction of compacting/composting scheme for Chinatown • Draft timetable for implementation by end of September 2003 	
		<ul style="list-style-type: none"> • Monitor progress of Kingly Court recycling scheme through data collection 	<ul style="list-style-type: none"> • Managing agents to collate data • RPS to utilise for reporting
		<ul style="list-style-type: none"> • Monitor progress of compacting at Kingly Court through data collection 	
		<ul style="list-style-type: none"> • Investigate potential to extend recycling/compacting schemes to other parts of the Carnaby/Seven Dials Estate. 	

Number	Objectives	Targets 2003/04	Personnel Responsible
E4	Ensure that contractors (including cleaners, maintenance personnel etc. comply with the Company Policy	<ul style="list-style-type: none"> • Provide all contractors with a copy of the Company Policy by Dec 2003 	<ul style="list-style-type: none"> • Managing agents
		<ul style="list-style-type: none"> • Provide short induction training for new contractors re. Company Policy by February 2004 	<ul style="list-style-type: none"> • RPS to prepare • Managing agents to train
		<ul style="list-style-type: none"> • Maintain documented audit trail 	<ul style="list-style-type: none"> • Managing agents
E5.	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 by December 2003 	<ul style="list-style-type: none"> • Managing agents to maintain asbestos register • Managing agents to collate hazardous waste data
		<ul style="list-style-type: none"> • Measure volume of hazardous waste disposed to landfill 	

Policy Goal F: Shaftesbury PLC expects its contractors, as supervised by its consultants to adopt 'best environmental practice' in the refurbishment of the Company's property portfolio.

Number	Policy Objectives	Targets 2003/04	Personnel Responsible
F1.	Efficient use of energy and water	<ul style="list-style-type: none"> Identify key energy and water efficiency measures that can be included in refurbishment projects in addition to requirements of Building Regs by Jan 2004 	RPS to amend specification checklist and issue to project managers
		<ul style="list-style-type: none"> Identify baseline for the number of schemes with energy & water efficiency measures included by August 2004 	Project managers and RPS
F2.	Timber will be sourced, where possible, from well managed sources certified by third party certification bodies	<ul style="list-style-type: none"> Draft a Timber Tracking questionnaire for verification of suppliers by end October 2003 	RPS to draft questionnaire
		<ul style="list-style-type: none"> Continue to monitor specification of timber and maintain documented audit trail 	Project managers
F3	Management and disposal of construction waste	<ul style="list-style-type: none"> Identify contract split for measurement of waste to generate KPI eg. Volume of waste against contract value 	Project managers/RPS
		<ul style="list-style-type: none"> Issue waste management checklist to all contracts from September 2003 	
		<ul style="list-style-type: none"> Collate waste management data 	

Number	Policy Objectives	Targets 2003/04	Personnel Responsible
F4.	For projects of capital value over £50,000, Shaftesbury will sign up to Considerate Contractors Scheme	<ul style="list-style-type: none"> • Ensure all eligible schemes are signed up for 2003/04 	Project Managers
		<ul style="list-style-type: none"> • Achieve a minimum score of 24/40 (satisfactory performance) on 80% of eligible schemes 	
F5.	During construction the Company through its Project Managers will endeavour to minimise adverse impacts on the environment	<ul style="list-style-type: none"> • Provide all contractors with a copy of the Company Policy in tender documentation 	Project managers
		<ul style="list-style-type: none"> • Provide short induction training for new contractors re. Company Policy by February 2004 	<ul style="list-style-type: none"> • RPS to prepare • Project managers to train
		<ul style="list-style-type: none"> • Maintain documented audit trail 	<ul style="list-style-type: none"> • Project managers

Social Responsibility

Policy Goal G: Shaftesbury will conduct its business with integrity

Number	Objectives	Targets 2003/04	Personnel Responsible
G1.	Be honest, open, helpful and polite	<ul style="list-style-type: none"> • Participate in the BiTC Corporate Responsibility Survey for 2003 	Shaftesbury/RPS
		<ul style="list-style-type: none"> • Remain in FTSE4Good Index for 2003/04 	
G2.	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none"> • Create proforma by beginning of October 2003 for recording contact with tenants. 	Shaftesbury surveyors/Managing agents
		<ul style="list-style-type: none"> • Record number of contacts with tenants made by Shaftesbury surveyors for year 2003/04. 	
G3.	Obey all relevant laws and regulations and comply with other key policy goals with regard to customer relations.	<ul style="list-style-type: none"> • Achieve 100% compliance 	Shaftesbury

Policy Goal H: Shaftesbury recognises the need for investing in its employees and provides opportunities for training and personal development

Number	Objectives	Targets 2003/04	Personnel Responsible
H1.	Ensure all employees have a performance review annually	<ul style="list-style-type: none">• All employees to have appraisal and training needs to be identified and recorded by Dec 2003	Shaftesbury
		<ul style="list-style-type: none">• Provide CSR awareness training to all staff and key suppliers by September 2003 and repeat annually.	Shaftesbury/RPS

Policy Goal I: Shaftesbury is committed to providing its employees with safe and favourable working conditions that are free from unnecessary risk.

Number	Objectives	Targets 2003/04	Personnel Responsible
11.	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"> • Undertake a Health & Safety risk assessment for Head Office by December 2003. 	Shaftesbury/RPS
		<ul style="list-style-type: none"> • Monitor legal compliance within Head Office 	
		<ul style="list-style-type: none"> • Verify legality of all new subcontractors and their staff i.e. have appropriate permits to work in this country from January 2003 	RPS to draft questionnaire to verify sub-contractors legality by October 2003
		<ul style="list-style-type: none"> • Provide health & safety induction training for all subcontractors on refurbishment projects from December 03 	Project Managers
		<ul style="list-style-type: none"> • Monitor legal compliance within refurbishment projects 	Project Managers
		<ul style="list-style-type: none"> • Provide documented audit trail 	RPS to audit

Policy Goal J: Shaftesbury is committed to providing equal opportunities for all its employees and potential employees

Number	Objective	Targets 2003/04	Personnel Responsible
J1.	Monitor the effectiveness of the equal opportunities policy	<ul style="list-style-type: none">• Review approach to recruitment to confirm that it satisfies Policy.• Review approach to internal staff management to ensure compliance	Shaftesbury

Community Engagement

Policy Goal K: Shaftesbury is committed to being a good corporate citizen within its local community through both charitable giving and engagement

Number	Objectives	Targets 2003/04	Personnel Responsible
K1.	Seek to continue to qualify as a member of the One Per Cent Club and will 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 for 2003/04 	Shaftesbury
K2.	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 2003/04 Continue to encourage local groups and charities to utilise Shaftesbury facilities Work with statutory bodies to support local culture i.e. facilitate Westminster Council to assist the Chinese Community to create a Far Eastern Arts Campaign Identify and mentor one other major company operating in the Chinatown/Carnaby St/Covent Garden areas as to how they can improve their relationship within the community. Identify and mentor one major tenant as to how they can improve their community engagement. 	Shaftesbury