

Shaftesbury PLC

CSR ACTION PLAN

2004 -5

RPS Health, Safety & Environment

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Overall Policy Goals

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

Number	Objectives	Targets 2004-05	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 2005 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Issue updated Policy and key objectives to 10 largest suppliers. 	Brian Bickell
		<ul style="list-style-type: none"> Issue Policy to all new commercial tenants from October 2004. 	Shaftesbury

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

Number	Objective	Targets 2004-05	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 2004-05 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Review Policy May 2005 for approval at the Board meeting in July 2005 	
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 2004 -05 	
		<ul style="list-style-type: none"> Undertake annual audit in August – September 2005 to monitor performance against the Policy and Action Plan 	

Note: The timeframe of 2004 - 2005 for implementation of the objectives and targets is consistent with the financial year of end of September 2004 to end September 2005.

Environmental Responsibility

Policy Goal C: Comply with Legal Requirements

Number	Objectives	Targets 2004-05	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 2004 – 05 using checklist 	RPS to liaise 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 2004 -05 	All above

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

Number	Objectives	Targets 2004-05	Personnel Responsible
D1.	Undertake environmental/building health surveys of properties prior to purchase if appropriate	<ul style="list-style-type: none"> Ensure environmental/building health surveys are utilised to screen properties prior to purchase 	<ul style="list-style-type: none"> Shaftesbury/ Project Managers
		<ul style="list-style-type: none"> Audit findings of surveys 	<ul style="list-style-type: none"> RPS at annual audit
D2.	Continue to maximise use of 'brownfield' land in London's West End	<ul style="list-style-type: none"> Continue to achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment of portfolio. 	<ul style="list-style-type: none"> Shaftesbury

Policy Goal E: Minimise environmental impacts during management of properties

Number	Objectives	Targets 2004-05	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"> Research implications of EU Energy Performance of Buildings Directive 	<ul style="list-style-type: none"> RPS/Project Managers
		<ul style="list-style-type: none"> Implement programme of necessary actions 	
		<ul style="list-style-type: none"> Monitor costs of use of "green tariff" electricity in Carnaby/Seven Dials 	<ul style="list-style-type: none"> Managing agents/Shaftesbury
		<ul style="list-style-type: none"> Review if applicable to continue/extend to rest of portfolio by September 2005. 	
		<ul style="list-style-type: none"> Achieve maximum use of long life light bulbs within common parts of managed portfolio, within constraints of replacing fittings, by August 2005 	<ul style="list-style-type: none"> Managing agents
		<ul style="list-style-type: none"> Draft leaflet for issuing to tenants in portfolio to raise awareness of energy efficiency by February 2005. 	<ul style="list-style-type: none"> RPS to prepare material Managing agents to issue to tenants
		<ul style="list-style-type: none"> Issue to tenants to raise awareness & to improve energy use by March 2005 (see also E1) 	

Number	Objectives	Targets 2004-05	Personnel Responsible
E2.	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> Monitor water use in Carnaby and Covent Garden common parts 	<ul style="list-style-type: none"> Managing agent to collect data RPS to collate for reporting baseline
		<ul style="list-style-type: none"> Replace all water tanks in Chinatown portfolio with mains water by August 2005 	<ul style="list-style-type: none"> Managing agent
E3.	Monitor and reduce waste from its managed properties including the Head Office	<ul style="list-style-type: none"> Continue to monitor progress of Chinatown waste management plan for 2003-04 & liaise with Westminster for future initiatives on recycling etc. 	<ul style="list-style-type: none"> Shaftesbury/ Managing agent
		<ul style="list-style-type: none"> Monitor progress of recycling schemes through data collection at Kingly Court 	<ul style="list-style-type: none"> Managing agent 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 Thomas Neill's. 	
		<ul style="list-style-type: none"> Draft leaflet for issuing to tenants in Carnaby and Covent Garden by February 2005. 	<ul style="list-style-type: none"> RPS to prepare material Managing agent to issue to tenants
		<ul style="list-style-type: none"> Issue to tenants to raise awareness & to improve utilisation of facilities by March 2005 (see also E1) 	
		<ul style="list-style-type: none"> Continue to monitor volume of paper sent for recycling from Head Office 	<ul style="list-style-type: none"> Shaftesbury/RPS
		<ul style="list-style-type: none"> Measure volume of paper purchased and identify ways in which this can be reduced through re-use and more efficient use of email etc. 	<ul style="list-style-type: none"> Shaftesbury/RPS
		<ul style="list-style-type: none"> Set targets by December 2004 	

Number	Objectives	Targets 2004-05	Personnel Responsible
E4	Ensure that contractors (including cleaners, maintenance personnel etc. comply with the Company Policy	<ul style="list-style-type: none"> • Issue Induction Leaflet to all contractors working on portfolio from November 2004 	<ul style="list-style-type: none"> • Shaftesbury to finalise • Managing agents
		<ul style="list-style-type: none"> • Maintain documented audit trail of contractors that have received leaflet 	<ul style="list-style-type: none"> • Managing agents to keep records • RPS to audit
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 	<ul style="list-style-type: none"> • Managing agents to maintain asbestos register • Managing agents to collate hazardous waste data • RPS to audit
		<ul style="list-style-type: none"> • Retain copies of waste transfer notes and record 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 2004-05	Personnel Responsible
F1.	Efficient use of energy and water	<ul style="list-style-type: none"> Identify baseline for the number of schemes with energy & water efficiency measures included by January 2005 	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"> Review use of Timber Tracking questionnaire end November 2004 	RPS /Project Managers
		<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"> Continue to monitor construction waste generated data for all projects above £50,000 	Project managers/RPS
		<ul style="list-style-type: none"> Project managers to ensure waste transfer notes retained as part of contract documentation 	
		<ul style="list-style-type: none"> RPS to audit at annual audit in September 2005 	

Number	Policy Objectives	Targets 2004-05	Personnel Responsible
F4.	For projects of capital value over £50,000, Shaftesbury will sign up to Considerate Constructors Scheme	<ul style="list-style-type: none"> • Ensure all eligible schemes are signed up for 2004-05 	<ul style="list-style-type: none"> • Project Managers • RPS
		<ul style="list-style-type: none"> • Achieve a minimum score of 24/40 (satisfactory performance) on 80% of eligible schemes 	
		<ul style="list-style-type: none"> • RPS to audit results & identify any areas for improvement 	
F5.	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 	Project managers
		<ul style="list-style-type: none"> • Issue Induction Leaflet to all contractors working on portfolio from November 2004 	<ul style="list-style-type: none"> • Shaftesbury to finalise • Project managers to issue
		<ul style="list-style-type: none"> • Maintain documented audit trail of contractors that have received leaflet 	<ul style="list-style-type: none"> • Project managers to keep records • RPS to audit

Social Responsibility

Policy Goal G: Shaftesbury will conduct its business with integrity

Number	Objectives	Targets 2004-05	Personnel Responsible
G1.	Be honest, open, helpful and polite	<ul style="list-style-type: none"> Participate in the BiTC Corporate Responsibility Survey for 2004 Remain in FTSE4Good Index for 2004-05 Meet with key investors to discuss their expectations 	Shaftesbury/RPS
G2.	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none"> Continue to maintain existing constant liaison between tenants, managing agents & Shaftesbury 	Shaftesbury surveyors/Managing agents
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 2004-05	Personnel Responsible
H1.	Ensure all employees have a performance review annually	• Shaftesbury to implement system of formal annual staff appraisal and review	Shaftesbury
		• All employees to have appraisal and training needs to be identified and recorded by Dec 2004	Shaftesbury
		• Continue to provide CSR awareness training to all staff and key suppliers with annual awareness training	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 2004-05	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"> • Review findings of Health & Safety risk assessment undertaken in November 2004 to identify any additional actions. 	Brian Bickell
		<ul style="list-style-type: none"> • Identify outstanding actions by December 2004 	
		<ul style="list-style-type: none"> • Ensure health & safety induction training is being undertaken by contractors of all site staff (see findings of Considerate Constructors Scheme) 	Project Managers
		<ul style="list-style-type: none"> • Issue HSE "<i>Absolutely Essential Health & Safety Toolkit for the smaller construction contractor</i>" 	
		<ul style="list-style-type: none"> • Ensure all key information e.g. contacts for local police station, hospital, fire station etc are displayed at all projects (see findings of Considerate Constructors Scheme) by December 2004 	Project Managers
		<ul style="list-style-type: none"> • Monitor legal compliance within refurbishment projects 	
<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 2004-05	Personnel Responsible
J1.	Monitor the effectiveness of the equal opportunities policy	<ul style="list-style-type: none">• Monitor approach to internal staff management & recruitment to ensure compliance with equal opportunities policy	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 2004-05	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 2004/05 	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 2004-05 Provide office space for small charities within Chinatown Continue to work with statutory bodies to support local culture i.e. facilitate Westminster Council to assist the Chinese Community Continue to mentor the National Magazine Company in their support of the Soho Centre. Identify and mentor one major tenant as to how they can improve their community engagement. 	Shaftesbury