



Shaftesbury PLC

CSR ACTION PLAN

2005 - 6

RPS Health, Safety & Environment
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October 2005

Overall Policy Goals

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

| Number | Objectives | Targets 2005-06 | 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 October 2006 | RPS/Shaftesbury |
| | | <ul style="list-style-type: none"> Issue Policy and key objectives to Joint Venture partners to ensure that they understand Shaftesbury's Corporate Social Responsibility Policy and Strategy. | Shaftesbury |
| | | <ul style="list-style-type: none"> Ensure Policy is issued to all new commercial tenants as part of tenant's pack from October 2005. | EA Shaw |

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

| Number | Objective | Targets 2005-06 | 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 2005-06 | RPS/Shaftesbury |
| | | <ul style="list-style-type: none"> Review Policy May 2006 for approval at the Board meeting in July 2006 | |
| 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 2005 -06 | |
| | | <ul style="list-style-type: none"> Undertake annual audit in August – September 2006 to monitor performance against the Policy and Action Plan | |

Note: The timeframe of 2005 – 2006 for implementation of the objectives and targets is consistent with the financial year of end of September 2005 to end September 2006.

Environmental Responsibility

Policy Goal C: Comply with Legal Requirements

| Number | Objectives | Targets 2005-06 | 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 2005– 06 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 2005 -06 | All above |

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

| Number | Objectives | Targets 2005-06 | 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 of all properties. | <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 central London | <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 2005-06 | 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 current energy usage in Shaftesbury Head Office and identify ways in which it can be reduced by December 2005. | <ul style="list-style-type: none"> Shaftesbury |
| | | <ul style="list-style-type: none"> Identify costs of use of "green tariff" electricity in Carnaby/Seven Dials by end October 2005. | <ul style="list-style-type: none"> Managing agents/Shaftesbury |
| | | <ul style="list-style-type: none"> Purchase 5% green tariff electricity for Carnaby/Seven Dials throughout 2005-06 | |
| | | <ul style="list-style-type: none"> Continue to monitor use of long life light bulbs within common parts of managed portfolio. Achieve maximum use within constraints of existing fittings. | <ul style="list-style-type: none"> Managing agents |
| | | <ul style="list-style-type: none"> Investigate options for 'offsetting' carbon emissions and set targets, if considered appropriate by January 2006. | <ul style="list-style-type: none"> RPS/Shaftesbury |
| | | <ul style="list-style-type: none"> Agree content of leaflet for issuing to tenants in portfolio to raise awareness of energy efficiency etc by November 2005. | <ul style="list-style-type: none"> RPS & Managing agents to agree material Managing agents to issue to selected tenants |
| | | <ul style="list-style-type: none"> Identify top 10% of tenants with respect to rental size and issue leaflet to raise awareness & to improve energy use by January 2006 (see also E1) | |

| Number | Objectives | Targets 2005-06 | Personnel Responsible |
|---------------|--|---|--|
| E2. | Monitor and, where possible, minimise water consumption | <ul style="list-style-type: none"> • Monitor water use in Carnaby St/Seven dials common parts. | <ul style="list-style-type: none"> • EA Shaw to collect data • RPS to collate for reporting baseline |
| | | <ul style="list-style-type: none"> • Monitor water use for South Service yard in Chinatown. | <ul style="list-style-type: none"> • Nelson Bakewell |
| 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 2004-05 & liaise with Westminster for future initiatives on recycling etc. | <ul style="list-style-type: none"> • Shaftesbury/Nelson Bakewell |
| | | <ul style="list-style-type: none"> • Undertake waste audit of waste contractor used at Thomas Neal's to establish if it should be used throughout the portfolio by November 2005. | <ul style="list-style-type: none"> • RPS/ EA Shaw |
| | | <ul style="list-style-type: none"> • Continue to monitor progress of recycling schemes through data collection at Kingly Court. | <ul style="list-style-type: none"> • EA Shaw to collate data • RPS to utilise for reporting |
| | | <ul style="list-style-type: none"> • Continue to monitor progress of compacting at Kingly Court through data collection. | |
| | | <ul style="list-style-type: none"> • Agree content of leaflet for issuing to tenants in portfolio to raise awareness of energy efficiency etc by November 2005. | <ul style="list-style-type: none"> • RPS to revise material • Managing agents to issue to selected tenants |
| | | <ul style="list-style-type: none"> • Identify top 10% of tenants with respect to rental size and issue leaflet to raise awareness & to improve waste management by January 2006 (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"> • Continue to monitor recycled paper purchased. | <ul style="list-style-type: none"> • Shaftesbury/RPS |

| Number | Objectives | Targets 2005-06 | 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 October 2005. | <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 2005-06 | Personnel Responsible |
|---------------|---|--|-------------------------------|
| F1. | Efficient use of energy and water | <ul style="list-style-type: none"> Monitor specification of water and energy efficiency measures included within refurbishment schemes using Specification checklist. | 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 findings of completed Timber Tracking questionnaires and identify list of preferred suppliers by December 2005. | RPS /Project Managers |
| | | <ul style="list-style-type: none"> Ensure that preferred suppliers demonstrate sourcing of sustainable timber for 30% of timber purchased from January 2006. | Shaftesbury /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 verify duty of care of 10% of waste contractors used for refurbishment contracts. Selected contractors to be agreed by November 2005 and audits to be undertaken by March 2006. | |
| | | <ul style="list-style-type: none"> RPS to audit all data at annual audit in September 2006 | |

| Number | Policy Objectives | Targets 2005-06 | Personnel Responsible |
|---------------|--|---|--|
| F4. | For projects of capital value over £50,000, and in excess of six weeks duration, Shaftesbury will sign up to Considerate Constructors Scheme | <ul style="list-style-type: none"> • Ensure all eligible schemes are signed up for 2005-06. | <ul style="list-style-type: none"> • Project Managers • RPS |
| | | <ul style="list-style-type: none"> • Improve on last year by achieving a minimum score of 26/40 (above satisfactory performance) on 80% of schemes audited. | |
| | | <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"> • Continue to issue Induction Leaflet to all contractors working on portfolio. | <ul style="list-style-type: none"> • 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 |
| | | <ul style="list-style-type: none"> • Identify small contractors that would benefit from attending seminars by Build Up SME Consortium Project and facilitate their participation by December 2005. | <ul style="list-style-type: none"> • Project managers to action • RPS to audit |

Social Responsibility

Policy Goal G: Shaftesbury will conduct its business with integrity

| Number | Objectives | Targets 2005-06 | Personnel Responsible |
|---------------|--|---|---------------------------------------|
| G1. | Be honest, open, helpful and polite | <ul style="list-style-type: none"> • Participate in the BiTC Corporate Responsibility Survey for 2005. • Remain in FTSE4Good Index for 2005-06. • 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 2005-06 | Personnel Responsible |
|---------------|---|--|------------------------------|
| H1. | Ensure all employees have a performance review annually | <ul style="list-style-type: none">• Shaftesbury to progress system of formal annual staff appraisal and review October 2005 and continue annually. | Shaftesbury |
| | | <ul style="list-style-type: none">• 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 2005-06 | 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"> • Selected Shaftesbury personnel to attend First Aid training course in October 2005. | Shaftesbury |
| | | <ul style="list-style-type: none"> • Identify outstanding actions by December 2005. | |
| | | <ul style="list-style-type: none"> • 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"> • Project Managers • RPS to audit |
| | | <ul style="list-style-type: none"> • Achieve zero reportable accident/incidents throughout 100% of the portfolio. | |
| | | <ul style="list-style-type: none"> • Ensure all key information e.g. contacts for local police station, hospital, fire station etc are displayed at 100% of projects (see findings of Considerate Constructors Scheme) by December 2005. | Project Managers |
| | | <ul style="list-style-type: none"> • Ensure 100% of eligible sites have at least one external audit by CCS (includes health & safety criteria). | 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 2005-06 | 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 2005-06 | 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 2005/06 | 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 2005-06 Extend Art at Kingly Court to Art at Carnaby and throughout whole portfolio. Provide office space for small charities within whole portfolio. Extend office provision to Hungerford Drug Project. Continue to work with statutory bodies through financial support to improve the local environment e.g. lighting projects, pavement maintenance etc. Extend support to Chinatown and other schemes in Carnaby. Investigate opportunities to mentor big business in the estate and improve their community engagement. | Shaftesbury |