

RPS

Shaftesbury PLC

CR ACTION PLAN

2007- 8

**RPS Health, Safety & Environment
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**HLM0296
November 2007**

Overall Policy Goals

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

Number	Objectives	Targets 2007-08	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 2008. 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Ensure Policy is continues to be issued to all new commercial tenants as part of tenant's pack. 	Managing agents
		<ul style="list-style-type: none"> Review content of Contractor's leaflet and reissue (once current supply is used). 	RPS/Shaftesbury

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

Number	Objective	Targets 2007-08	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 2007-08 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Review Policy May 2008 for approval at the Board meeting in July 2008 	
B2	The Company will monitor and report publicly on its performance	<ul style="list-style-type: none"> Report performance against Action Plan on Company website 	RPS/Shaftesbury
		<ul style="list-style-type: none"> Include summary of performance in Annual Report 2007-08 	
		<ul style="list-style-type: none"> Put case studies on the website of projects demonstrating sustainability initiatives e.g. Tavistock St 	
		<ul style="list-style-type: none"> Undertake annual audit in August – September 2008 to monitor performance against the Policy and Action Plan 	

Note: The timeframe of 2007 – 2008 for implementation of the objectives and targets is consistent with the financial year of end of September 2007 to end September 2008.

Environmental Responsibility

Policy Goal C: Comply with Legal Requirements

Number	Objectives	Targets 2007-08	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 2007-08 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 2007-08 	All above

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

Number	Objectives	Targets 2007-08	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 2007-08	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"> Extend proportion of green tariff electricity to Seven Dials i.e . total of 60% of portfolio. 	<ul style="list-style-type: none"> Managing agents/Shaftesbury
		<ul style="list-style-type: none"> Continue to monitor use of long life light bulbs within common parts of managed portfolio – aim for 100% utilisation. 	<ul style="list-style-type: none"> Managing agents
		<ul style="list-style-type: none"> By end 2007, EA Shaw to undertake and review findings of questionnaire re. energy use issues by tenants and identify key suggestions to take forward. 	<ul style="list-style-type: none"> EA Shaw

Number	Objectives	Targets 2007-08	Personnel Responsible
E2.	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> • Investigate high water meter readings at 23 Ganton Street, 14-22 Ganton Street, 1a Earlham Street and 26 Kingly Street. 	<ul style="list-style-type: none"> • EA Shaw
		<ul style="list-style-type: none"> • Monitor water use in Carnaby/Seven dials common parts – aim for 75% reporting of readings. 	<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"> • Implement proposal for residential recycling point on west side of South Service yard and monitor use. 	<ul style="list-style-type: none"> • Shaftesbury/Nelson Bakewell
		<ul style="list-style-type: none"> • By November 2007, utilise single waste contractor for Carnaby/Seven Dials and collate data. 	<ul style="list-style-type: none"> • EA Shaw to collate data • RPS to utilise for reporting
		<ul style="list-style-type: none"> • Implement findings of questionnaire sent to tenants re. waste by investigating ways of providing additional recycling facilities. 	<ul style="list-style-type: none"> • EA Shaw
		<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 volume of paper purchased. 	<ul style="list-style-type: none"> • Shaftesbury/RPS

Number	Objectives	Targets 2007-08	Personnel Responsible
E4	Ensure that contractors (including cleaners, maintenance personnel etc. comply with the Company Policy	<ul style="list-style-type: none"> • Continue to issue Induction Leaflet to all contractors working on portfolio throughout 2007 -08. 	<ul style="list-style-type: none"> • Shaftesbury • 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 2007-08	Personnel Responsible
F1.	Efficient use of energy and water	<ul style="list-style-type: none"> Project managers to utilise revised Specification and Contractor's checklists for all projects above £75,000 from November 2007. 	RPS/Project Managers
		<ul style="list-style-type: none"> Implement installation of retrospective measures to improve energy and water efficiency in Neals Yard. 	Shaftesbury
F2.	Timber will be sourced, where possible, from well managed sources certified by third party certification bodies	<ul style="list-style-type: none"> Maximise proportion of timber that is reused within projects and monitor for reporting purposes. 	<ul style="list-style-type: none"> Project managers RPS to audit
		<ul style="list-style-type: none"> Contractors to retain all timber supply invoices. RPS to collate information to identify proportion sourced from certified timber 	<ul style="list-style-type: none"> Project Managers to ensure contractors retain invoices RPS to collate
		<ul style="list-style-type: none"> Ensure that 100% of hardwood timber is sourced from a certified sustainable source. 	<ul style="list-style-type: none"> Shaftesbury /Project Managers RPS to audit
		<ul style="list-style-type: none"> Ensure that preferred suppliers demonstrate sourcing of a minimum of 30% of other types of timber from a certified sustainable source. 	<ul style="list-style-type: none"> Shaftesbury /Project Managers RPS to audit
		<ul style="list-style-type: none"> Continue to monitor specification of timber and maintain documented audit trail 	<ul style="list-style-type: none"> Project managers RPS to audit

Number	Policy Objectives	Targets 2007-08	Personnel Responsible
F3	Management and disposal of construction waste	<ul style="list-style-type: none"> • Continue to monitor construction waste generated data for all projects above £75,000. • Project managers to ensure waste transfer notes retained as part of contract documentation. • RPS to repeat duty of care of 10% of waste contractors used for refurbishment contracts. Selected contractors to be agreed by November 2007 and audits to be undertaken by March 2008. 	<ul style="list-style-type: none"> • Project managers • RPS to audit
F4.	For projects of capital value over £75,000, and in excess of six weeks duration, Shaftesbury will sign up to Considerate Constructors Scheme (NB. <i>Schemes that only involve external repair and decoration will not be included</i>)	<ul style="list-style-type: none"> • Ensure all eligible schemes are signed up for 2007-08 • Project managers to advise contractors of areas for improvement by December 2007. • Shaftesbury/Project managers to require under performing contractors (one substandard score) to attend CCS training course. • If performance does not improve, contractor's inclusion on tender list to be reviewed. • Improve on last year's performance by achieving a minimum score of 26/40 (above satisfactory performance) on 80% of schemes audited. • RPS to audit results & identify any areas for further improvement in 2008. 	<ul style="list-style-type: none"> • Shaftesbury/Project Managers • RPS to audit

Number	Policy Objectives	Targets 2007-08	Personnel Responsible
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

Social Responsibility

Policy Goal G: Shaftesbury will conduct its business with integrity

Number	Objectives	Targets 2007-08	Personnel Responsible
G1.	Be honest, open, helpful and polite	<ul style="list-style-type: none"> Remain in FTSE4Good Index for 2007-08. Remain in Dow Jones Sustainability Index for 2007-08. 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 2007-08	Personnel Responsible
H1.	Ensure all employees have a performance review annually	<ul style="list-style-type: none">• Shaftesbury to continue annual system of formal annual staff appraisal.	Shaftesbury
		<ul style="list-style-type: none">• Continue to provide CR 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 2007-08	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"> 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 findings of Considerate Constructors Scheme are implemented at 100% of projects: <ul style="list-style-type: none"> Contacts and location of local police station, hospital, fire station etc are displayed Policies for smoking and swearing are displayed First aiders identified 	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 2007-08	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 2007-08	Personnel Responsible
K1.	Seek to continue to qualify as a member of the Per Cent Club (or equivalent) 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 2007-08 	Shaftesbury
		<ul style="list-style-type: none"> Barnados has been identified as the preferred charity for 2007-08 and specific events will be organised throughout the year. 	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 2007-08 	Shaftesbury
		<ul style="list-style-type: none"> Continue to provide office space for small charities within whole portfolio. 	
		<ul style="list-style-type: none"> 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/Seven Dials 	
		<ul style="list-style-type: none"> Continue to investigate opportunities to mentor big business in the estate and improve their community engagement. 	