

Shaftesbury PLC
Corporate Responsibility
Action Plan 2013-2014

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Note: The timeframe of 2013–2014 for implementation of the objectives and targets is consistent with the financial year, which is 1st October 2013 to 30th September 2014.

1.0 Stakeholders and Our Local Community

Policy Goal A: Disseminate the Corporate Responsibility Policy and Promote Staff, Tenant and Principal Supplier Awareness

Number	Objectives	Targets 2013-2014	Key Performance Indicator	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"> Ensure Policy continues to be issued to all new commercial tenants as part of tenants pack. 	Number of new tenants receiving Policy	Managing agents
		<ul style="list-style-type: none"> Ensure Contractors’ Leaflet is issued as part of all refurbishment contracts 	% of contractors receiving contractors leaflet	Shaftesbury/Project Managers
A2	Provide appropriate awareness raising and engagement with tenants within the portfolio	<ul style="list-style-type: none"> Replace Tenants’ leaflet with a more detailed Sustainability Guide for commercial tenants as part of Insurance Pack Ensure Sustainability Leaflet for residential tenants is included in all new letting packs 	<ul style="list-style-type: none"> Number of commercial tenants receive Sustainability Guide Number of residential tenants that receive leaflet 	Shaftesbury/ Managing agents

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
		<ul style="list-style-type: none"> • Provide subsidised two year membership of Sustainable Restaurant Association (SRA) for every new restaurant tenant • Undertake test case review of success of use of SRA Restaurant Fit Out by tenant at Newman Street Tavern 	<ul style="list-style-type: none"> • Number of new restaurant tenants registered with SRA 	Shaftesbury
A3	Provide appropriate training and awareness to staff and principal suppliers	<ul style="list-style-type: none"> • Undertake update awareness training for all personnel and key suppliers by November 2014. 	Awareness training attended by staff and suppliers	RPS/Shaftesbury
		<ul style="list-style-type: none"> • Continue to issue the following checklists to the Principal Suppliers: <ul style="list-style-type: none"> - Contractors Checklist - Specification Checklist - Legal Compliance Checklist 	Number of projects over £100,000 threshold where Checklists have been completed	RPS/Shaftesbury
		<ul style="list-style-type: none"> • Require contractors working on Shaftesbury refurbishment schemes to record the number of employees and subcontractors with Construction Skills Certification Scheme (CSCS) Cards 	Number of projects over £100,000 threshold where CSCS cards are recorded	

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

Number	Objective	Targets 2013-2014	Key Performance Indicator	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 2013-2014 	Action Plan reviewed	RPS/Shaftesbury
		<ul style="list-style-type: none"> Review Policy in May 2014 for approval at the Board meeting in July 2014 	Policy reviewed and approved	
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, 	Report publically available	RPS/Shaftesbury
		<ul style="list-style-type: none"> Include summary of performance in Annual Report 2013-2014 	Input into Annual Report	
		<ul style="list-style-type: none"> Include Greenhouse Gas Emissions performance within Annual Report 	Input into Annual Report	
		<ul style="list-style-type: none"> Undertake annual audit in August – September 2014 to monitor performance against the Policy and Action Plan 	Audit completed	
		<ul style="list-style-type: none"> Consider use of GRI Guidelines G4 for reporting 	Structure of Report	

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

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
C1	Join the London Benchmarking Group and 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 and community support for 2013-2014. 	<ul style="list-style-type: none"> List of key charities 	Shaftesbury
		<ul style="list-style-type: none"> Select relevant benchmarking measurements 	<ul style="list-style-type: none"> As per LBG 	Shaftesbury
C2	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 2013-2014. 	<ul style="list-style-type: none"> Staff hours 	Shaftesbury
		<ul style="list-style-type: none"> Continue to provide office space for small charities within portfolio. 	<ul style="list-style-type: none"> Office space provided 	
		<ul style="list-style-type: none"> Continue to support and provide facilities for up and coming artists and fashion designers. 	<ul style="list-style-type: none"> List of individuals supported 	
		<ul style="list-style-type: none"> Continue to work with statutory bodies through financial support to improve the local environment and public realm e.g. lighting projects, pavement maintenance etc. Extend support to Chinatown and other schemes in Carnaby/Seven Dials. 	<ul style="list-style-type: none"> Value of support 	

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
D1	Be honest, open, helpful and polite	<ul style="list-style-type: none"> Remain in FTSE4Good Index for 2013-2014. 	Listing in FTSE4Good Index	Shaftesbury/RPS
		<ul style="list-style-type: none"> Remain in Dow Jones Sustainability Index for 2013-2014. 	Listing in DJSI Index	
		<ul style="list-style-type: none"> Participate in GRESB survey 	Listing in GRESB	
		<ul style="list-style-type: none"> Engage with key investors and other benchmarking agencies. 	Minutes of meetings/calls with investors	
		<ul style="list-style-type: none"> Participate in Carbon Disclosure Project 	Listing in CDP	
D2	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none"> Continue to maintain existing regular liaison between tenants, managing agents & Shaftesbury. 	Records of meetings	Shaftesbury surveyors/Managing agents
		<ul style="list-style-type: none"> Analyse the impact of implementation of the Energy Act 2011 with respect to Minimum Energy Performance Standards on E rated properties. 	Review of findings	
D3	Comply with all relevant laws and regulations and other key policy goals with regard to customer relations.	<ul style="list-style-type: none"> Achieve 100% compliance. 	% Compliance	Shaftesbury
D4	Ensure suppliers are paid within 30 days	<ul style="list-style-type: none"> Monitor payment times 	% of suppliers paid within timeframe	Shaftesbury

2.0 Environment

Policy Goal E: Comply with Legal Requirements

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
E1	Comply with all legal and regulatory requirements	<ul style="list-style-type: none"> Review legislation checklists to ensure are current. 	Legal checklist reviewed	RPS to liaise with: <ul style="list-style-type: none"> Shaftesbury Project Managers Managing agents
		<ul style="list-style-type: none"> Monitor environmental compliance on refurbishment and construction projects for 2013-2014 using checklist 	Number of projects above £100,000 monitored	
		<ul style="list-style-type: none"> Achieve zero environmental non-compliance for 2013-2014 	Number of non-compliances	All above

Policy Goal F: Before purchase, environmental audits are conducted where appropriate

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
F1	Undertake environmental/building health surveys of properties prior to purchase if appropriate	<ul style="list-style-type: none"> 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. 	Survey reports for all purchases	Shaftesbury/ Project Managers
F2	Continue to invest only in 'brownfield' sites	<ul style="list-style-type: none"> Continue to achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment of portfolio. 	% of development on brownfield land	Shaftesbury

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

Number	Policy Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
G1	To operate in an environmentally sustainable manner throughout its activities	<ul style="list-style-type: none"> Continue to refurbish existing buildings and promote the re-use of materials to reduce the need to introduce additional 'embodied' carbon. Maintain BREEAM criteria for reuse of structure and façade in 100% of refurbishment: <ul style="list-style-type: none"> 50% of façade reused; 80% by volume of existing primary structure reused 	<ul style="list-style-type: none"> % of total façade reused % by volume of existing primary structure reused 	Shaftesbury
		<ul style="list-style-type: none"> Continue to assess whether renewable energy technologies can be economically incorporated into future projects, including heat recovery technology. 	% of renewables included within refurbishment	Shaftesbury/Project Managers
		<ul style="list-style-type: none"> Aim for BREEAM Very Good for any new commercial developments. 	BREEAM Very Good	Shaftesbury/SPPM
		<ul style="list-style-type: none"> Continue to pilot use of BREEAM Domestic Refurbishment on selected schemes. 	BREEAM Predictive assessment score	Shaftesbury/Project Managers
		<ul style="list-style-type: none"> Aim for an EPC Grade B EPC rating on new build 	EPC rating	Shaftesbury/SPPM
		<ul style="list-style-type: none"> Ensure in all structural refurbishments over £100,000 (excluding retail shell) that the existing EPC rating is improved by: <ul style="list-style-type: none"> One grade where EPC rating is grade D Two grades for non listed building of EPC grade E or below <p><i>NB. Same EPC assessor to be used for before and after</i></p>	Increase in EPC rating for structural refurbishments	Shaftesbury/Project Managers

Number	Policy Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
G2	Efficient use of energy and water	<ul style="list-style-type: none"> Project managers to use revised Specification and Contractor's checklists for all projects over £100,000. 	Number of schemes over £100,000 completing checklists	RPS/Project Managers
G3	Timber will be sourced, where possible, from well managed sources certified by third party certification bodies	<ul style="list-style-type: none"> Continue to maximise proportion of timber that is reused within projects and monitor for reporting purposes. 	% of timber reused within refurbishment	<ul style="list-style-type: none"> Project managers RPS to audit
		<ul style="list-style-type: none"> Contractors to retain all timber supply invoices and ensure that full chain of custody details are recorded. RPS to collate information to identify proportion sourced from certified timber 	Chain of custody information on invoices	<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. 	% of hardwood timber 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 55% of other types of timber from a certified sustainable source. 	% of other timber sourced from a certified sustainable source	<ul style="list-style-type: none"> Shaftesbury /Project Managers RPS to audit
		<ul style="list-style-type: none"> Aim for suppliers to source a minimum of 30% timber from an FSC certified source. 	% of FSC timber sourced	<ul style="list-style-type: none"> Project managers RPS to audit

Number	Policy Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
G4	Management and disposal of construction waste	<ul style="list-style-type: none"> • Continue to monitor construction waste generated data for all projects above £100,000. • Project managers to ensure waste transfer notes retained as part of contract documentation. • Ensure that all contracts above the legal threshold of £300,000 complete an appropriate Site Waste Management Plan (SWMP). • Aim to reuse or recycle 80% of non-hazardous demolition and construction waste by weight for projects covered by a SWMP. • RPS to repeat duty of care of 10% of waste contractors used for refurbishment contracts. Audits to be undertaken by March 2014. 	<ul style="list-style-type: none"> Number of schemes above £100,000 collating data Waste transfer notes retained Number of schemes with SWMP % of reused or recycled waste for projects with SWMP Audit completed 	<ul style="list-style-type: none"> • Project managers • RPS to audit • Project managers RPS/Project Managers

Number	Policy Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
G5	For projects of capital value over £100,000, and in excess of six weeks duration, Shaftesbury will sign up to Considerate Constructors Scheme. (NB. Schemes that only involve external repair and decoration will not be included)	<ul style="list-style-type: none"> • Require all principal contractors that work on Shaftesbury schemes to register as a company to CCS. • Ensure all eligible schemes are signed up for 2013-2014 • Achieve a minimum score of 30/50 (above satisfactory performance) on 100% of schemes audited. 	<ul style="list-style-type: none"> • % of Principal Contractors registered with CCS • Number of schemes • % of schemes above 30/50 	<ul style="list-style-type: none"> • Shaftesbury/ Project Managers/RPS • RPS to audit
G6	Improve biodiversity appropriate to the Group's urban location	<ul style="list-style-type: none"> • Improve biodiversity within existing portfolio through use of bird nesting boxes at appropriate locations. • Improve biodiversity within existing portfolio through inclusion of green roofs and walls where feasible. • Research opportunities of supporting bees in the capital with appropriate use of planters and window boxes. • Investigate opportunities to work in conjunction with Crown Estates to improve biodiversity in central London 	<ul style="list-style-type: none"> • Number of schemes with bird boxes • Number of schemes with green walls/roofs • Number of window boxes within portfolio 	<ul style="list-style-type: none"> • Shaftesbury/RPS to identify locations • Managing agents/Project managers to implement

Number	Policy Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
G7	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 	Number of schemes completing checklists	Project managers
		<ul style="list-style-type: none"> Continue to issue Induction Leaflet to all contractors working on portfolio. 	% of contractors receiving contractors leaflet	Project managers
		<ul style="list-style-type: none"> Ensure that a minimum of 80% water based paints are used to minimise pollution. 	% of water based paints specified	Project managers
		<ul style="list-style-type: none"> Continue to ensure that there are minimal emissions to air and water given small scale and location of schemes in central London 		Project managers
		<ul style="list-style-type: none"> Monitor energy and water use on site throughout the life of the project. 	Water and energy data	Project managers

Policy Goal H: Minimise environmental impacts and operate in an environmentally sustainable manner in management of properties

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
H1	Monitor and where possible reduce energy consumption and investigate opportunities for the use of renewable energy	<ul style="list-style-type: none"> Continue to monitor energy consumption in Shaftesbury Head Office and common parts of portfolio including 50% of St Martins Courtyard. 	<ul style="list-style-type: none"> Total energy consumption tonnes CO₂ 	<ul style="list-style-type: none"> Managing agents to collect data RPS to collate for reporting baseline
		<ul style="list-style-type: none"> Aim for 5% reduction in energy consumption across the portfolio from base year of 2013 including 50% of St Martins Courtyard. 	<ul style="list-style-type: none"> % reduction across portfolio 	
		<ul style="list-style-type: none"> Confirm definitive floor areas that are being assessed against energy consumption. 	<ul style="list-style-type: none"> Carbon per m² not to exceed target 	
		<ul style="list-style-type: none"> Aim for solely owned common parts normalised data to not exceed 100kgCO_{2e}/m² 		
		<ul style="list-style-type: none"> 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
		<ul style="list-style-type: none"> Continue to monitor use of long life light bulbs within common parts of managed portfolio: <ul style="list-style-type: none"> Aim for 100% use in Carnaby, Seven Dials and Longmartin 	% of long life bulbs within portfolio	Managing agents

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
H2	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> Continue to investigate opportunities for including water meters in properties in Soho portfolio. 	Number of water meters installed	MJ Mapp
		<ul style="list-style-type: none"> Monitor water use in Carnaby/Seven dials common parts – aim for 75% reporting of readings. Aim to reduce water consumption by 5% from base year of 2013. Aim for usage at maximum of 0.5m³/m² 	<ul style="list-style-type: none"> % of meter readings % reduction Water use does not exceed 0.5m³/m² 	<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 – maintain constant usage 	Water use does not exceed 2012-13 usage	MJ Mapp

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
H3	Monitor and reduce waste from its managed properties including the Head Office	<ul style="list-style-type: none"> Maintain discussions with Westminster CC to identify residential recycling point within Chinatown. 		Shaftesbury/MJ Mapp
		<ul style="list-style-type: none"> Divert from landfill minimum of 90% of tenant generated waste from Carnaby and Seven Dials and St Martin's Courtyard 	% of tenants' waste diverted from landfill	Shaftesbury/Capita/EA Shaw
		<ul style="list-style-type: none"> Recycle a minimum of 30% tenants waste at Carnaby and Seven Dials 	% of waste recycled	EA Shaw
		<ul style="list-style-type: none"> Recycle a minimum of 10% tenants waste at St Martin's Courtyard and divert minimum of 90% of remainder from landfill. 	% of waste recycled	Capita
		<ul style="list-style-type: none"> Install compostable waste disposal facility at St Martin's Courtyard. 		Shaftesbury/Capita
		<ul style="list-style-type: none"> Research feasibility of communal recycling point in Opera Quarter. 		Shaftesbury/Capita
		<ul style="list-style-type: none"> Continue to monitor volume of paper sent for recycling from Head Office. 	Tonnes paper recycled	Shaftesbury/RPS
		<ul style="list-style-type: none"> Continue to monitor volume of paper purchased for use in Head Office 	% recycled paper purchased	Shaftesbury/RPS

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
H4	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 2013 -2014. Maintain documented audit trail of contractors that have received leaflet. 	Number of Induction Leaflets issued	<ul style="list-style-type: none"> Shaftesbury Managing agents Managing agents to keep records RPS to audit
H5	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. Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill 	Asbestos register updated	<ul style="list-style-type: none"> Managing agents to maintain asbestos register Managing agents to collate hazardous waste data RPS to audit

3.0 Employees

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

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
I1	Ensure all employees have a performance review annually	<ul style="list-style-type: none"> Shaftesbury to continue annual system of formal staff appraisal. 	% of staff receiving appraisal	Shaftesbury
		<ul style="list-style-type: none"> Continue to provide CR awareness training to all staff and key suppliers with annual awareness training. 	List of attendees	Shaftesbury/RPS
		<ul style="list-style-type: none"> Monitor and report on total training spend per employee 		Shaftesbury

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

Number	Objectives	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
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	<ul style="list-style-type: none"> Review Health and Safety Policy for Head Office and portfolio. 	Updated policy	<ul style="list-style-type: none"> Shaftesbury
		<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. 	Number of prohibition/enforcement notices received	Project managers
		<ul style="list-style-type: none"> Record absenteeism within Shaftesbury Head Office. 	Number of days absent/employee	Shaftesbury
		<ul style="list-style-type: none"> Ensure findings of Considerate Constructors Scheme are implemented at 100% of projects: <ul style="list-style-type: none"> Demonstrate written contact to neighbours at start of contract Documented policies in place re. swearing and smoking First aiders appropriately identified Records of medical conditions kept on site Adequate welfare facilities provided 	% of Schemes with satisfactory scores above 30/50	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). 	% of eligible schemes subject to CCS audit	Project Managers

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

Number	Objective	Targets 2013-2014	Key Performance Indicator	Personnel Responsible
K1	<p>Monitor the effectiveness of the equal opportunities policy and comply with all the key employment legislation such as: Sex Discrimination Act, Race Relations Act, Disability Discrimination Act, Human Rights Act, Employment Equality (Age) Regulations and the Protection from Harassment Act.</p>	<ul style="list-style-type: none"> Monitor approach to internal staff management & recruitment to ensure compliance with equal opportunities policy and other key employment legislation. 	<p>% of women in board/senior/management positions</p>	Shaftesbury
		<ul style="list-style-type: none"> Monitor staff turnover. 	<p>% of leavers as part of total staff number per year</p>	Shaftesbury
		<ul style="list-style-type: none"> Monitor average length of service 	<p>Number of years of service per employee</p>	Shaftesbury
		<ul style="list-style-type: none"> Consider the Universal Declarations of Human Rights and the UN Framework and Guiding Principles on Business and Human Rights (the Ruggie Framework) and the UN Global Compact and to see if either one appropriate to adopt taking into consideration Shaftesbury's activities. 	<p>Results of assessment</p>	Shaftesbury
K2	<p>Provide opportunities for flexible working</p>	<ul style="list-style-type: none"> Record number of staff with flexible working/part time arrangements. 	<p>% of staff</p>	Shaftesbury



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