

# SHAFTESBURY PLC

## STATEMENT OF GRI COMPLIANCE

### FOR YEAR ENDED 30 SEPTEMBER 2012

The Global Reporting Initiative (GRI) is the leading voluntary sustainability reporting standard and this year we have benchmarked our reporting contained within the Annual Report 2012 and the Corporate Responsibility Report Against Action Plan 2012 against the updated Global Reporting Initiative sustainability reporting guidelines [GRI: G3.1 Construction and Real Estate Sector Supplement]. The GRI Framework sets out principles and indicators for measuring and reporting economic, environmental and social performance in a balanced and reasonable manner.

We have chosen to present our reporting using the two principal reports identified above and consider that between these documents the core Reporting Principles of Defining Report Content and Defining Report Quality have been applied as follows:

- Materiality – the initial baseline report in 2003 set the materiality factors for the reporting and are continuously reviewed and updated on an annual basis.
- Stakeholder Inclusiveness – the full list of stakeholders, including investors, business partners, tenants, employees, local community groups and principal suppliers that are key to our operations are listed on our website and within the reports identified above. Engagement with these stakeholders has helped to inform our reporting approach.
- Sustainability Context and Completeness – we recognise the sustainability agenda to be continually evolving and our reporting details our key sustainability impacts in the context of the wider concerns at sectoral, local and regional levels as well as the risks and opportunities pertinent to our own business strategy.
- Report Quality to encompass balance, comparability, accuracy, timeliness, clarity and reliability – we have published an audit of our corporate responsibility performance in tandem with our Annual Report and accounts each year since 2004. These documents are all available on our website and provide a publically accessible measure of our year on year performance. The audit is undertaken by RPS and provides an objective analysis and report of performance against key performance indicators and includes both the negative and the positive. The information provided is in a form to enable comparability for the purpose of benchmarking our performance against that of our peers.

The standard disclosure requirements have then been assessed as below from which we assess our application of the GRI reporting framework to be at **Level C**.

| 1. Strategy and Analysis  |  |          |   |
|---------------------------|--|----------|---|
| Profile Disclosure        | Description  | Reported | Cross-reference/Direct answer   |
| 1.1                       | Statement from the most senior decision-maker of the organization.   | Yes      | Corporate Responsibility Report Against Action Plan 2012 (CR Report 2012) p5, Annual Report 2012 Corporate Responsibility Statement signed by Brian Bickell Chief Executive p42 |
| 2. Organizational Profile |  |          |   |
| Profile Disclosure        | Description  | Reported | Cross-reference/Direct answer   |
| 2.1                       | Name of the organization.  | Yes      | Shaftesbury PLC   |
| 2.2                       | Primary brands, products, and/or services.   | Yes      | Annual Report 2012, CR Report 2012 p11 Company Overview   |
| 2.3                       | Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.  |          | Annual Report 2012 Business Review p14-34   |
| 2.4                       | Location of organization's headquarters.   | Yes      | Shaftesbury PLC, Pegasus House, 37/43 Sackville St, London W1S3DL   |
| 2.5                       | Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report. | Yes      | Shaftesbury PLC operates only in London in England  |
| 2.6                       | Nature of ownership and legal form.  | Yes      | Public listed company - Annual Report 2012  |
| 2.7                       | Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).   | Yes      | Annual Report 2012 Business Review p14-34, CR Report 2012 p11 Company Overview  |
| 2.8                       | Scale of the reporting organization.   | Yes      | Annual Report 2012 Chief Executive's Report p8-11 and Business Review p14-34, CR Report 2012 p11 Company Overview   |
| 2.9                       | Significant changes during the reporting period regarding size, structure, or ownership.   | Yes      | Annual Report 2012 Business Review p14-34.  |
| 2.10                      | Awards received in the reporting period.   | Yes      | CR Report 2012 p39 Stakeholder Engagement<br>Annual Report 2012 Corporate Responsibility p42  |

### 3. Report Parameters

| Profile Disclosure | Description   | Reported | Cross-reference/Direct answer  |
|--------------------|---|----------|--|
| 3.1                | Reporting period (e.g., fiscal/calendar year) for information provided.   | Yes      | The CR Report 2012 covers the period from 1 October 2011 to 30 September 2012 (unless otherwise stated)  |
| 3.2                | Date of most recent previous report (if any).   | Yes      | The previous CR Report (2011) was published in December 2011 covering the period 1 October 2010 to 30 September 2011   |
| 3.3                | Reporting cycle (annual, biennial, etc.)  | Yes      | Published annually in December to cover the financial year October to September  |
| 3.4                | Contact point for questions regarding the report or its contents.   | Yes      | Penny Thomas, Company Secretary<br><a href="mailto:penny.thomas@shaftesbury.co.uk">penny.thomas@shaftesbury.co.uk</a>  |
| 3.5                | Process for defining report content.  | Yes      | CR Report 2012 p11-13 Introduction and Methodology   |
| 3.6                | Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.  | Yes      | CR Report 2012 p11-13 Introduction and Methodology.  |
| 3.7                | State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).  | Yes      | No limitations, encompasses entire business and the property portfolio within the control of the company as landlord.  |
| 3.8                | Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.                     | Yes      | CR Report 2012 p11. There is one joint venture, Longmartin Properties Limited which is dealt with as a landlord managed asset and the only property leased by the company is the head office premises, which is also reported.   |
| 3.10               | Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods). | Yes      | CR Report 2012 Data Appendices p49-51. Year on year carbon emissions data is updated according to the most recent Defra Guidelines for Greenhouse Gas Reporting. For the most recent reporting year the August 2012 version was used. Restatement of water data on p58-61. |
| 3.11               | Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.   | Yes      | CR Report 2012 p19-21, Annual Report 2012 p43 Change in measurement method of reporting energy and carbon in advance of 2013 mandatory carbon reporting requirements.  |

| 3.12  | Table identifying the location of the Standard Disclosures in the report.  | Yes             | Statement of Compliance for year ended 30 September 2012   |
|---|--|-----------------|--|
| <b>4. Governance, Commitments, and Engagement</b> |  |                 |  |
| <b>Profile Disclosure</b>                         | <b>Description</b>   | <b>Reported</b> | <b>Cross-reference/Direct answer</b>   |
| 4.1   | Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight. | Yes             | Annual Report 2012 Corporate Responsibility p42-46, Corporate Governance p50-64  |
| 4.2   | Indicate whether the Chair of the highest governance body is also an executive officer.  | Yes             | Annual Report 2012 Corporate Governance p50-64. The Chairman is non-executive.   |
| 4.3   | For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.        | Yes             | Annual Report 2012 Corporate Governance p50-64   |
| 4.4   | Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.  | Yes             | Annual Report 2012 Corporate Governance p50-64, CR Report 2012 p39   |
| 4.14  | List of stakeholder groups engaged by the organization.  | Yes             | Annual Report 2012 Corporate Responsibility p42-46, CR Report 2012 p11-12, p17-18 and p39-41   |
| 4.15  | Basis for identification and selection of stakeholders with whom to engage.  | Yes             | Annual Report 2012 Corporate Responsibility p42-46, Corporate Responsibility Policy<br><a href="http://www.shaftesbury.co.uk/responsibility.php">http://www.shaftesbury.co.uk/responsibility.php</a> |

**STANDARD DISCLOSURES PART III: Performance Indicators**

**REPORT FULLY ON 10 CORE OR ADDITIONAL PERFORMANCE INDICATORS - AT LEAST 1 FROM EACH DIMENSION (ECONOMIC, ENVIRONMENTAL SOCIAL)**

**Economic**

| <b>Performance Indicator</b> | <b>Description</b>  | <b>Reported</b> | <b>Cross-reference/Direct answer</b>  |
|------------------------------|---|-----------------|---|
| <b>Economic performance</b>  |   |                 |   |
| <b>EC1</b>                   | Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments. | Yes             | Annual Report 2012 Business Review p14-33, Annual Report 2012 Corporate Responsibility p42-46, Annual Report Remuneration Report p55-62 |

**Indirect economic impacts**

|            |  |     |  |
|------------|--|-----|--|
| <b>EC8</b> | Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. | Yes | Annual Report 2012 Business Review p14-33, Annual Report 2012 Corporate Responsibility p42-46, CR Report 2012 p40-41, community investment measured in accordance with LBG criteria. |
|------------|--|-----|--|

**Environmental**

| <b>Performance Indicator</b> | <b>Description</b>  | <b>Reported</b> | <b>Cross-reference/Direct answer</b>  |
|------------------------------|---|-----------------|---|
| <b>Materials</b>             |   |                 |   |
| <b>EN2</b>                   | Percentage of materials used that are recycled input materials. | Yes             | CR Report 2012 p28-29 and Data Appendices S Percentage Reuse of Timber on Refurbishment Schemes p63 and T Proportion of Retained Façade and Primary Structure p62 |

**Energy**

|            |   |     |   |
|------------|---|-----|---|
| <b>EN3</b> | Direct energy consumption by primary energy source. | Yes | CR Report 2012 p8 and 20-21 and Data Appendices B and C Energy Usage and Carbon Emissions for wholly owned portfolio and E and F Energy Data and Carbon emissions for St Martin's Courtyard (Landlord consumption) and G for air conditioning |
| <b>EN4</b> | Indirect energy consumption by primary source.      | Yes | CR Report 2012 p20-21 and Data Appendices B and C Energy Usage and Carbon Emissions for wholly owned portfolio and E and F Energy Data and Carbon emissions   |

|  |  |                 |  |
|--|--|-----------------|--|
|  |  |                 | for St Martin's Courtyard (Landlord consumption) and G for air conditioning  |
| <b>CRE1</b>                                    | Building energy intensity.   | Yes             | CR Report 2012 p22 and Data Appendices D Energy Usage and Carbon Emissions for wholly owned portfolio and F Energy Data and Carbon emissions for St Martin's Courtyard (Landlord consumption)  |
| <b>EN6</b>                                     | Initiatives to provide energy efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. |                 | Annual Report 2012 Corporate Responsibility p45, CR Report 2012 p23 and Action Plan 2012 p9-10   |
| <b>Biodiversity</b>                            |  |                 |  |
| <b>EN14</b>                                    | Strategies, current actions, and future plans for managing impacts on biodiversity.  | Yes             | CR Report 2012 p29-31 and Corporate Responsibility Action Plan 2012 p12  |
| <b>Emissions, effluents and waste</b>          |  |                 |  |
| <b>EN16</b>                                    | Total direct and indirect greenhouse gas emissions by weight.  | Yes             | CR Report 2012 p20-21 and Data Appendices B and C Energy Usage and Carbon Emissions for wholly owned portfolio and E and F Energy Data and Carbon emissions for St Martins Courtyard (Landlord consumption), G for air conditioning and H for staff travel |
| <b>EN22</b>                                    | Total weight of waste by type and disposal method.   | Yes (75%)       | CR Report 2012 p24-26 and Data Appendices L M N and O and Action Plan 2012 p11 and p16   |
| <b>Compliance</b>                              |  |                 |  |
| <b>EN28</b>                                    | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.                       | Yes             | Annual Report 2012 Corporate Responsibility p46 and CR Report 2012 p8  |
| <b>Social: Labor Practices and Decent Work</b> |  |                 |  |
| <b>Performance Indicator</b>                   | <b>Description</b>   | <b>Reported</b> | <b>Cross-reference/Direct answer</b>   |
| <b>Employment</b>                              |  |                 |  |
| <b>LA1</b>                                     | Total workforce by employment type, employment contract, and region, broken down by gender.  | Yes             | Annual Report 2012 p43, CR Report 2012 p36   |
| <b>LA2</b>                                     | Total number and rate of new employee hires and employee turnover by age group, gender, and region.  | Yes             | Annual Report 2012 p43, 46 and 54, CR Report 2012 p36  |

| <b>Occupational health and safety</b>  |   |                 |  |
|--|---|-----------------|--|
| <b>LA7</b>                             | Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.  | Yes             | Annual Report 2012 Corporate Responsibility p46, CR Report 2012 p10 and 35   |
| <b>Training and education</b>          |   |                 |  |
| <b>LA10</b>                            | Average hours of training per year per employee by gender, and by employee category.  | Yes Partially   | CR Report 2012 p36 details the average hours of training for workforce of 22 people but not broken down by gender or category  |
| <b>LA12</b>                            | Percentage of employees receiving regular performance and career development reviews by gender.   | Yes             | Annual Report 2012 Corporate Responsibility p43, CR Report 2012 p36  |
| <b>Diversity and equal opportunity</b> |   |                 |  |
| <b>LA13</b>                            | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity. | Yes             | Annual Report 2012 Corporate Governance p50-52 and p54 and CR Report 2012 p36  |
| <b>Social: Society</b>                 |   |                 |  |
| <b>Performance Indicator</b>           | <b>Description</b>  | <b>Reported</b> | <b>Cross-reference/Direct answer</b>   |
| <b>Local communities</b>               |   |                 |  |
| <b>SO1</b>                             | Percentage of operations with implemented local community engagement, impact assessments, and development programs.   | Yes             | Annual Report 2012 Business Review and Corporate Responsibility p14-46, CR Report 2012 p39-42  |
| <b>Corruption</b>                      |   |                 |  |
| <b>SO2</b>                             | Percentage and total number of business units analyzed for risks related to corruption.   | Yes             | Annual Report 2012 Audit Committee Report p63, Corporate Responsibility Policy<br><a href="http://www.shaftesbury.co.uk/responsibility.php">http://www.shaftesbury.co.uk/responsibility.php</a>  |
| <b>Public policy</b>                   |   |                 |  |
| <b>SO6</b>                             | Total value of financial and in kind contributions to political parties politicians and related institutions by country.  | Yes             | Nil - Annual Report 2012 Directors' Report p66, Corporate Responsibility Policy<br><a href="http://www.shaftesbury.co.uk/responsibility.php">http://www.shaftesbury.co.uk/responsibility.php</a> |

| Social: Product Responsibility       |  |          |  |
|--------------------------------------|--|----------|--|
| Performance Indicator                | Description  | Reported | Cross-reference/Direct answer  |
| <b>Product and service labelling</b> |  |          |  |
| <b>CRE8</b>                          | Type and number of sustainability certification, rating and labelling schemes for new construction, management, occupation, and redevelopment. | Yes      | Annual Report 2012 Corporate Responsibility p42-46, Corporate Responsibility Action Plan 2012 p9, CR Report 2012 p18 and 23 - Commitment to achieve BREEAM Very Good on all new developments and use of BREEAM Domestic refurbishment. EPC Grade B on all new build and target grades on refurbishments. |