

Sustainability Action Plan 2022

CARNABY

Shaftesbury

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Note: Implementation of the objectives and targets is consistent with the financial year, which is 1 October 2021 to 30 September 2022.

This documents set out the actions required by Shaftesbury and its partners to achieve our strategic goals and meet our reporting obligations. All employees, contractors, agents and suppliers are required to abide by the objectives and targets.

Any questions should be directed to:

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Shafesbury's advisors include:

RPS – Shaftesbury's Sustainability Consultant
CBRE – Shaftesbury's portfolio Managing Agent

1.0 Strategic goal:

Conduct our business with integrity at all times

Policy goal A: We conduct our business with integrity and require our directors, employees and other businesses engaged by us, including contractors, suppliers and agents to do the same.



Number	Objectives	Management actions	Key performance indicator	Responsibility / applicable parties
A1	Provide the standards of accommodation and services that have been agreed	<ul style="list-style-type: none">• Ensure regular contact between tenants, managing agents and ourselves.		Shaftesbury - Surveyors / CBRE
	Target	<ul style="list-style-type: none">• Undertake tenant surveys	Percentage coverage	Shaftesbury - FM & Surveyors
A2	Pay suppliers promptly	<ul style="list-style-type: none">• Monitor payment times.		Shaftesbury - Finance
	Target	<ul style="list-style-type: none">• Pay all suppliers within thirty days.	Percentage of suppliers paid	Shaftesbury - Finance
A3	Promote principles of the United Nations Global Compact (UNGC) throughout the supply chain	<ul style="list-style-type: none">• Monitor implementation of Supplier Code of Conduct for direct suppliers.		Shaftesbury - Sustainability/ CBRE / Project Managers
A4	Ensure no corruption in accordance with UNGC anti-corruption principles and ensure compliance with anti-bribery and corruption policy	<ul style="list-style-type: none">• Monitor implementation of anti-bribery and anti-corruption policies.		Shaftesbury - CoSec

2.0 Strategic goal: Invest in the welfare and development of our people

Policy goal B: We recognise the importance of the welfare of our people which includes employees, agents, contractors and suppliers.



Number	Objectives	Management actions	Key performance indicator	Responsibility / applicable parties
B1	Ensure compliance with the Health and Safety at Work Act 1974, minimise the risk of reportable health and safety accidents/incidents and support wellbeing throughout the portfolio.	• Review health and safety policy for our head office and portfolio.		Shaftesbury - FM
		• Ensure health and safety induction training is undertaken by contractors for all site staff		Project managers / CBRE
		• Commence the implementation of ISO45001 framework.		Shaftesbury - FM
		• Strengthen the Health and Safety committee to diversify representation across the organisation		Shaftesbury - FM
		• Establish policy to support the mental health of all our employees and contractors		Shaftesbury - FM
	Targets	• Record absenteeism within our head office.	Number of days absent	Shaftesbury - HR
		• 100% of contractors on refurbishment projects to hold a Construction Skills Certification Scheme (CSCS) Card.	Percentage of site staff with CSCS cards	Project managers / CBRE
		• All employees and contractors have access to mental health support.	Percentage to access training or support	Shaftesbury - HR / Project managers and CBRE

Policy goal C: We promote diversity and inclusion across our company and are committed to the training and development of our employees.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
C1	Comply with employment legislation and best practices on diversity and inclusion	<ul style="list-style-type: none"> Promote diversity and inclusion across our business and supply chain Ensure compliance with equal opportunities policy. 		All
				Shaftesbury
	Targets	<ul style="list-style-type: none"> Monitor employee turnover. 	Percentage of leavers as part of total employee numbers per year	Shaftesbury - HR
		<ul style="list-style-type: none"> Monitor average length of service. Monitor relevant diversity metrics including percentage of women in key positions. Monitor availability and uptake of flexible/part time working. 	Number of years of service per employee Percentage of women in board/senior management positions Percentage of employees with flexible work/part time arrangements	Shaftesbury - HR Shaftesbury - HR Shaftesbury - HR
C2	Invest in training and development of our employees	<ul style="list-style-type: none"> Support people to focus on their development and provide solutions based on individual needs. 		Shaftesbury - HR
	Target	<ul style="list-style-type: none"> Undertake personal development reviews for all employees 	Percentage of employees completing development reviews	Shaftesbury - HR
		<ul style="list-style-type: none"> All employees offered and access training to include our sustainability and net zero carbon commitments Enable and encourage all employees to participate in volunteering activities during working hours. 	Training days undertaken Employee volunteering hours	Shaftesbury - HR Shaftesbury - HR

Policy goal C: continued.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
C3	London Living Wage is paid throughout the supply chain when within our control	<ul style="list-style-type: none"> • Monitor remuneration for all full time personnel working within the portfolio. • Mandate the London Living Wage across our villages 		Shaftesbury - Sustainability / CBRE / Project managers
	Target	<ul style="list-style-type: none"> • All new contracts agreed within the portfolio to pay London Living Wage. • Maintain accreditation from London Living Wage Foundation. 	<p>Percentage of contracts which state that the London living wage should be paid</p> <p>Accreditation maintained</p>	Shaftesbury / CBRE Shaftesbury - Sustainability
C4	Principal suppliers to comply with the Modern Slavery Act 2015	<ul style="list-style-type: none"> • Continue to work with direct suppliers to ensure compliance. 		Shaftesbury/All direct suppliers
	Target	<ul style="list-style-type: none"> • Provide all contractors with information on modern slavery through use of leaflets and posters at sites e.g. Stronger2gether. • Complete an annual modern slavery risks assessment and employee awareness training 	<p>Percentage of sites providing information</p>	Shaftesbury - Sustainability / Project managers / CBRE

3.0 Strategic goal:

Build and maintain successful relationships with stakeholders based on respect, trust and mutual benefit

Policy goal D: We engage with stakeholders to ensure we are aware of, and are able to respond to, their expectations.



Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
D1	Circulate Sustainability Policy to our employees, managing agents, contractors and tenants and make it available to the public	<ul style="list-style-type: none"> Issue Sustainability Policy to all new commercial tenants. Issue contractors' leaflet as part of all refurbishment contracts. 		CBRE Shaftesbury - Sustainability / Project managers / CBRE
D2	Undertake appropriate tenant engagement to raise awareness	<ul style="list-style-type: none"> Include sustainability information and requirements in online portals throughout portfolio. Include sustainability requirements in leases and estate regulations. 		Shaftesbury - Sustainability / CBRE Shaftesbury / CBRE
	Targets	<ul style="list-style-type: none"> Increase tenants' usage of the portal. Update sustainability information. Develop sustainable fit out guide for restaurant tenants. Issue green leases to all new commercial tenants. Report whole building energy performance data for the whole portfolio 	Number of tenants using portal Guide published Percentage of tenants on green lease. Percentage of portfolio reporting	CBRE Shaftesbury - Sustainability / FM Shaftesbury - Sustainability Shaftesbury - Sustainability / RPS

3.0 Strategic goal:

Build and maintain successful relationships with stakeholders based on respect, trust and mutual benefit continued

Policy goal D: continued.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
D3	Provide appropriate training and awareness to employees and principal suppliers	<ul style="list-style-type: none"> Undertake updated sustainability awareness training for all personnel and key suppliers by Spring 2022. Continue to issue the following checklists to principal suppliers: <ul style="list-style-type: none"> Contractors Checklist; and Specification Checklist. 		RPS / Shaftesbury
				RPS / Shaftesbury
	Target	<ul style="list-style-type: none"> All contractors working on our refurbishment schemes to record the number of employees and subcontractors with Construction Skills Certification Scheme (CSCS) Cards. 100% of key suppliers to have completed sustainability awareness training 	Report training undertaken	Project manager / RPS to audit compliance
D4	For capital value projects valued over £250,000, and in excess of three months' duration, ensure contractors sign up to Considerate Constructors Scheme (CCS).	<ul style="list-style-type: none"> Require all principal contractors that work on our schemes to register as a company to CCS. Ensure all eligible schemes are signed up for 2021-2022. 		Shaftesbury - Sustainability / Project managers / RPS to audit compliance
		<ul style="list-style-type: none"> Achieve a minimum score of 35/50 (above satisfactory performance) on 100% of schemes audited. 	Percentage of schemes above 35/50	Project managers / RPS

3.0 Strategic goal:

Build and maintain successful relationships with stakeholders based on respect, trust and mutual benefit continued

Policy goal E: We engage regularly with our institutional investors to ensure we continue to meet globally recognised sustainability standards and best practice.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
E1	The Sustainability Policy will be reviewed on an annual basis and objectives and targets will be set	<ul style="list-style-type: none"> Review policy in 2022 for approval at the Board meeting in November 2022. Review and update our 2021 materiality analysis as required 		Shaftesbury - Sustainability / RPS
E2	Monitor and report publicly on our performance	<ul style="list-style-type: none"> Report performance on our main website. Include summary of performance in the 2022 Annual Report. Report in accordance with European Public Real Estate (EPRA) Sustainability Best Practice Recommendations. 		Shaftesbury - Sustainability / RPS
E3	Maintain our ongoing engagement with institutional investors and we will continue to benchmark indices	<ul style="list-style-type: none"> Engage with key investors and other benchmarking agencies. Continue membership of Better Building Partnership (BBP) and be a signatory to the BBP Climate Commitment Remain a signatory to the UNGC 		Shaftesbury - Sustainability / RPS
	Targets	<ul style="list-style-type: none"> Remain in FTSE4Good Index for 2021 -2022 and retain listing on Dow Jones Sustainability Index Participate in the GRESB survey. Participate in Carbon Disclosure Project and improve score. Disclose climate risks and opportunities in line with recommendations of the Task Force on Climate-Related Financial Disclosure 	<p>Score in index</p> <p>Score in index</p> <p>Score in index</p> <p>TCFD compliance disclosures</p>	Shaftesbury - Sustainability / RPS

4.0 Strategic goal:

Invest in the wellbeing of our community

Policy goal F: We are committed to investing in young people and our local communities in Westminster and Camden.



Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
F1	Continue membership of the London Benchmarking Group (LBG) or equivalent	<ul style="list-style-type: none"> Maintain ongoing financial support to key charities and community support for 2021 - 2022. 	Value of support as per BS41	Shaftesbury - Sustainability & Community Investment Committee (CIC)
F2	Support grassroots community groups and proactively identify and work with charitable organisations.	<ul style="list-style-type: none"> Promote Community Investment Committee activities Review any applications for financial or in-kind support in a consistent manner through the Community Investment Committee Continue to work with charity partners in 2022. Continue to work with statutory bodies to improve the local environment and the public realm Identify new and established community partnerships to support young people and local communities Launch volunteering and coaching schemes to enable our employees to share their experience with local people 		Shaftesbury - Sustainability & CIC

Policy goal F: continued

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
F3	Promote employment opportunities for local people with our occupiers, supply chain and wider property industry	<ul style="list-style-type: none"> Establish a platform to connect our occupiers with organisations promoting local employment 	Establishment of platform	Shaftesbury - Sustainability
		<ul style="list-style-type: none"> All principal contractors working on Shaftesbury project(s) with capital value in excess of £1m (cumulative per year) are required to submit an annual 'Employment and Skills plan' 	Plans submitted	Project Managers / Contractors
F4	Provide local business and charities opportunities to operate with Shaftesbury villages	<ul style="list-style-type: none"> Provide short term lets on preferential rates for local start-up businesses, charities, museums, and cultural spaces 	Number and area of space provided	Shaftesbury - Sustainability
		<ul style="list-style-type: none"> Launch a 'business incubator' programme to provide businesses taking 'pop-up' space with relevant training 	Programme initiated	

5.0 Strategic goal: Operate in an environmentally sustainable manner and achieve long term net zero carbon targets through the sustainable re-use and management of buildings

Policy goal G: Comply with legal requirements.



Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
G1	Comply with all legal and regulatory requirements	<ul style="list-style-type: none"> Monitor environmental compliance on refurbishment and construction projects for 2021 - 2022 using checklist 		Shaftesbury / RPS / Project managers / CBRE
	Target	<ul style="list-style-type: none"> Ensure there is full environmental compliance for 2021 - 2022 	Number of non-compliances	All above

Policy goal H: Conduct environmental audits prior to the purchase of new assets.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
H1	Conduct environmental/building health surveys prior to purchase if appropriate and continue to invest only in 'brownfield' sites	<ul style="list-style-type: none"> Conduct environmental/building health surveys to include consideration of energy efficiency and MEES Review acquisition checklist in line with GRESB and BBP as appropriate to the portfolio 		Shaftesbury / CBRE
	Target	<ul style="list-style-type: none"> Achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment of portfolio. 	Percentage of brownfield used and regenerated	Shaftesbury

Policy goal I: Work with other stakeholders to investigate and promote solutions to reduce air pollution in the West End.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
I1	Collaborate with partners to reduce air pollution in central London	<ul style="list-style-type: none"> Implement Air Quality Strategy. Work with neighbouring landowners and local authorities to implement air quality solutions and delivery/waste consolidation strategy 		Shaftesbury – FM & Sustainability / CBRE

Policy Goal J: Set business wide carbon targets and increase resilience to climate change risks.

Number	Objective	Management actions and targets	Key performance indicator	Responsibility / applicable parties
J1	Report progress in line with commitment set out in our 2030 Net Zero Carbon Roadmap	<ul style="list-style-type: none"> Maintain validation of our carbon reduction targets by the Science based Targets initiative Annually report performance against science-based targets and 2030 net zero carbon roadmap Disclose climate risks and opportunities in line with recommendations of the Task Force on Climate-Related Financial Disclosure Research the possibility of achieving net zero carbon buildings within the portfolio 		Shaftesbury – Sustainability /RPS

Policy goal K: Design, develop and refurbish sustainable buildings whilst minimising the environmental impact of construction operations.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
K1	Minimise the environmental impact of our operations and reduce carbon emissions in line with our 2030 Net Zero Carbon Roadmap	<ul style="list-style-type: none"> • Prioritise the refurbish of existing buildings and re-use of materials to minimise ‘embodied’ carbon. • All major refurbishment projects to set embodied carbon reduction strategies at the design stage • Assess and report the embodied carbon in all refurbishment projects • Consider the end-of-life treatment of timber to maximise its benefit in sequestering carbon • Apply LETI 2030 targets of 500 kg/m2 for embodied carbon to major refurbishments and new build developments we may take on in future • Require site teams to purchase/procure electricity from renewable tariffs • Investigate how renewable energy technologies can be incorporated into future projects • Introduce a requirement to set carbon reduction targets in our supplier code of conduct • Prepare for the move from gas to electricity across the portfolio, where applicable • Consider utilising the NABERS UK rating approach for major refurbishments and large offices • Undertake whole life carbon audits on any major (above £250k capital value) refurbishments • Continue to increase our understanding of emissions relating to occupiers’ fitouts 		<p>Shaftesbury – Sustainability</p> <p>Shaftesbury – Sustainability / Project managers / RPS</p> <p>Project Managers / RPS</p> <p>Shaftesbury – Sustainability / RPS</p> <p>Shaftesbury – Sustainability / Project Managers</p> <p>Shaftesbury / Project Managers</p> <p>Shaftesbury – Sustainability / Project Managers</p> <p>Shaftesbury – Sustainability</p> <p>Shaftesbury – Sustainability</p> <p>Shaftesbury – Sustainability</p> <p>Shaftesbury – Sustainability</p>
	Targets	<ul style="list-style-type: none"> • Achieve BREEAM ‘Very Good’ and assess the potential to reach Excellent for all developments and/or refurbishment schemes of a capital value above £1 million • Aim for an EPC Grade B rating on all new builds. • Ensure that for all structural refurbishments of non-listed buildings for a value over £250,000 (excluding retail shell) target EPC B (EPC C for residential) • Report renewable energy generation and end use of the energy 	<p>BREEAM Score</p> <p>EPC rating</p> <p>EPC rating</p> <p>Reporting</p>	<p>Shaftesbury / Project managers</p> <p>Shaftesbury / Project managers</p> <p>Shaftesbury / Project managers</p> <p>RPS / Project Managers</p>

Policy goal k: continued

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
K2	Efficient use of energy and water	<ul style="list-style-type: none"> Design and develop water efficient buildings 		Shaftesbury / Project Managers
	Targets	<ul style="list-style-type: none"> All domestic refurbishment projects to target 96 to 107 litres/person/day All commercial projects to target a maximum of 40.6 litres/person/day 		Project Managers RPS to audit
K3	Source timber from sources certified by third party certification schemes	<ul style="list-style-type: none"> Maximise proportion of timber that is reused within projects and monitor for reporting purposes. 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 		Project managers/ RPS to audit Project managers to ensure contractors retain invoices RPS to collate
	Target	<ul style="list-style-type: none"> Source 100% of timber from a certified sustainable source (FSC / PEFC). Suppliers to source a minimum of 70% timber from a Forest Stewardship Council (FSC) certified source 	Percentage of timber from a certified sustainable source Percentage of FSC timber sourced	Shaftesbury / Project Managers RPS to audit Project Managers RPS to audit
K4	Management and disposal of construction waste	<ul style="list-style-type: none"> Monitor construction waste data for all projects above £250,000 and in excess of three months duration. Project managers to retain waste transfer notes as part of contract documentation. 		Project managers RPS to audit
	Target	<ul style="list-style-type: none"> Reuse or recycle 99% of demolition and construction waste by weight (excluding hazardous or contaminated waste). 	Percentage of reused or recycled waste for projects	Project managers
K5	During construction we will endeavour to minimise adverse impacts on the environment	<ul style="list-style-type: none"> Provide prospective contractors with a copy of company policy and specification questionnaires etc. in tender documentation. Issue Contractors Induction Leaflets to all contractors working on the portfolio. Monitor and report energy and water consumption on site throughout the life of the project. 		Project managers Project managers Project managers
	Targets	<ul style="list-style-type: none"> Achieve zero reportable environmental incidents. Specify 100% low VOC paints, adhesives and sealants to improve air quality 	Percentage of schemes with zero incidents Percentage of low VOC paints	Project managers Project managers

Policy goal k: continued

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
K6	Improve biodiversity	<ul style="list-style-type: none"> • Continue membership of Wild West End. • Develop a new five-year biodiversity strategy to increase nature across the portfolio. 		Shaftesbury
	Target	<ul style="list-style-type: none"> • Increase area of biodiversity features by 10% throughout portfolio. 	Area of biodiversity features	Shaftesbury Managing agents/Project managers to implement

Policy goal L: Minimise the environmental impact of our managed portfolio and encourage tenants to adopt sustainable practices.

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
L1	Reduce energy consumption in common parts and increase 'whole building' energy reporting	<ul style="list-style-type: none"> Continue to monitor energy consumption in our head office and common parts of portfolio 		CBRE to collect data RPS to collate for reporting baseline
		<ul style="list-style-type: none"> Increase proportion of definitive floor areas that are being assessed against energy consumption. 		Shaftesbury - Sustainability
		<ul style="list-style-type: none"> Implement step change findings from Energy Savings Opportunity Scheme (ESOS) audits. 		Shaftesbury - Sustainability
		<ul style="list-style-type: none"> Implement steps set out in the 2030 Net Zero Carbon Roadmap 		Shaftesbury - Sustainability
	Targets	<ul style="list-style-type: none"> 3% absolute annual reduction in landlord controlled energy consumption. Aim for a 5% like for like reduction in landlord controlled energy consumption against 2019. Report whole building energy consumption for 90% of the portfolio Increase the proportion of LED bulbs within common parts of the portfolio and specifically for external lighting. 	<p>Percentage reduction across portfolio</p> <p>Percentage like for like reduction across portfolio</p> <p>Percentage reporting</p> <p>Percentage of LED bulbs within the portfolio</p>	<p>CBRE / Shaftesbury</p> <p>CBRE / Shaftesbury</p> <p>CBRE / Shaftesbury / RPS</p> <p>Managing agents</p>
L2	Reduce greenhouse gas emissions in line with a science based target	<ul style="list-style-type: none"> Monitor and report greenhouse gas emissions for the landlord controlled portfolio including our head office. 		RPS / Shaftesbury
		<ul style="list-style-type: none"> Procure 100% renewable electricity for landlord controlled areas 		Shaftesbury
	Targets	<ul style="list-style-type: none"> Achieve a minimum 4.2% annual absolute reduction in carbon emissions (scope 1 and 2) and continue to reduce emissions in line with Science Based Targets To aim to not exceed 0.05 tonne CO₂e/m² for the common parts. Purchase 100% green electricity for landlord-controlled supplies 	<p>Annual reduction in GHG emissions</p> <p>Carbon per m² not to exceed target</p> <p>Percentage of electricity purchased through green energy tariffs</p>	<p>Shaftesbury / CBRE</p> <p>Shaftesbury / CBRE</p> <p>Shaftesbury - Sustainability</p>

Policy goal L: continued

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
L3	Monitor and, where possible, minimise water consumption	<ul style="list-style-type: none"> • Include water meters in properties where we are responsible for water purchase. • Include in all new tenancy agreements a request to access water meter data. 		CBRE
	Targets	<ul style="list-style-type: none"> • Monitor water use in Carnaby/Seven Dials' common parts. Aim for 90% reporting of readings. • Increase coverage of water data collection in the remainder of portfolio. • Aim to reduce like for like water consumption by 5% from 2020. • Aim for water usage at a maximum of 0.5m³/m². • Reduce water consumption per person in our head office by 5%. 	<p>Percentage of coverage</p> <p>Percentage of coverage</p> <p>Percentage reduction</p> <p>Water use does not exceed 0.5m³/m²</p> <p>m³/person % reduction</p>	<p>Shaftesbury – Surveyors / CBRE</p> <p>CBRE to collect data RPS to collate for reporting baseline</p> <p>Shaftesbury / CBRE</p> <p>Shaftesbury – Sustainability</p>
L4	Monitor and reduce waste from our properties including our head office	<ul style="list-style-type: none"> • Work with tenants to abolish single use plastics throughout the portfolio. 		Shaftesbury – Sustainability
	Targets	<ul style="list-style-type: none"> • Divert from landfill 100% of tenant generated waste from Carnaby and Seven Dials. • Recycle a minimum of 60% of tenant's waste at Carnaby and Seven Dials. • Aim for 20% compostable waste at Carnaby and Seven Dials. • Aim for 90% recycling in our head office. 	<p>Percentage of tenants' waste diverted from landfill</p> <p>Percentage of waste recycled</p> <p>Percentage of waste composted</p> <p>Percentage of waste recycled</p>	<p>Shaftesbury / CBRE</p> <p>CBRE</p> <p>Shaftesbury / CBRE</p> <p>Shaftesbury / RPS</p>
L5	Ensure that contractors comply with hazardous materials policy and materials from non-renewable resources policy	<ul style="list-style-type: none"> • Issue updated induction leaflet to all contractors working on the portfolio throughout 2020-2021. • Document audit trail of contractors. 		<p>Shaftesbury / CBRE</p> <p>CBRE to keep records RPS to audit</p>

Policy goal L: continued

Number	Objective	Management actions	Key performance indicator	Responsibility / applicable parties
L6	Remove and dispose of hazardous materials	<ul style="list-style-type: none"> • Ensure up to date asbestos register are held for the portfolio • Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill 		<p>CBRE to maintain asbestos register</p> <p>CBRE to collate hazardous waste data</p> <p>RPS to audit</p>
L7	Minimise air emissions through appropriate building management	<ul style="list-style-type: none"> • Roll out programme throughout the portfolio to ensure extractor duct maintenance • Progress boiler upgrades where viable following ESOS recommendations • Commission survey for the remainder of the portfolio to identify boilers that could be updated 		<p>CBRE to keep records</p> <p>Shaftesbury – Sustainability</p> <p>Shaftesbury – Sustainability</p>
L8	Minimise emissions to water through appropriate building management	<ul style="list-style-type: none"> • Discuss with tenants the effectiveness of grease traps for restaurants in Chinatown 		CBRE