

Sustainability Action Plan 2023



Shaftesbury

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Note: Implementation of the objectives and targets is consistent with the financial year, which is 1 October 2022 to 30 September 2023.

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:

Matt Smith, Head of Sustainability, Shaftesbury
 Fiona Daly, Community Engagement Manager, Shaftesbury

Shaftesbury's advisors include:

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

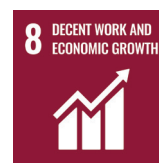
Strategic Goal 1.0: Conduct our business with integrity at all times



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 Undertake tenant surveys 	Percentage coverage	Shaftesbury - Surveyors / CBRE Shaftesbury - FM & Surveyors
A2	Pay suppliers promptly	<ul style="list-style-type: none"> Aim to pay all suppliers within 30 days or meet their payment terms 	Percentage of suppliers paid within 30 days	Shaftesbury - Finance
A3	Promote principles of the United Nations Global Compact (UNGC) throughout the supply chain	<ul style="list-style-type: none"> Require agreement to 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

Strategic goal 2.0: 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
		• Strengthen the Health and Safety committee to diversify representation across the organisation		Shaftesbury - FM Shaftesbury - FM
		• Maintain initiatives to support the mental health of all our employees and contractors		Shaftesbury - FM
	Targets	• Record absenteeism within our head office	Absenteeism rate	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 and training	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 	Number of years of service per employee	Shaftesbury – HR
		<ul style="list-style-type: none"> Monitor relevant diversity metrics including percentage of women in key positions 	Percentage of women in board/senior management positions	Shaftesbury – HR
		<ul style="list-style-type: none"> Monitor availability and uptake of flexible/part time working 	Percentage of employees with flexible work/part time arrangements	Shaftesbury – HR
C2	Invest in training and development of our employees	<ul style="list-style-type: none"> Support people to focus on their development provide solutions based on individual needs 		Shaftesbury – HR
	Target	<ul style="list-style-type: none"> Undertake personal development reviews for all employees Enable and encourage all employees to participate in volunteering activities during working hours 	Percentage of employees completing development reviews Employee volunteering hours	Shaftesbury – HR
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, where appropriate 		Shaftesbury – Sustainability / CBRE / Project managers Shaftesbury – Sustainability / CBRE / Project Managers
	Target	<ul style="list-style-type: none"> All new contracts agreed within the portfolio to pay London Living Wage, where appropriate Maintain accreditation from Living Wage Foundation 	Percentage of contracts which state that the London living wage should be paid Accreditation maintained	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 risk assessment and employee awareness training 	Percentage of sites providing information	Shaftesbury – Sustainability / Project Managers / CBRE

Strategic goal 3.0: Form partnerships to promote sustainability and build and maintain successful relationships with stakeholders based on respect, trust and mutual benefit

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FOR THE GOALS

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

Number	Objectives	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 retail and office 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
D3	Provide appropriate training and awareness to employees and partners	<ul style="list-style-type: none"> Undertake updated sustainability awareness training for all personnel and key partners by Spring 2023. Continue to issue the following checklists to principal suppliers <ul style="list-style-type: none"> - Contractors Checklist; and - Specification Checklist 		RPS / Shaftesbury - Sustainability RPS / Shaftesbury - Sustainability
	Target	<ul style="list-style-type: none"> 100% of key suppliers to have completed sustainability awareness training 		Project manager / CBRE / Shaftesbury - Sustainability
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 2022-2023. 		Shaftesbury - Sustainability / Project Managers / RPS RPS to audit compliance
	Target	<ul style="list-style-type: none"> Achieve a minimum score of 37/45 (above satisfactory performance) on 100% of schemes audited 	Percentage of schemes above 37/45	Project Managers / RPS

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

Number	Management Objective	Management Actions and targets	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 2023 for approval at the Board meeting in November 2023. 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 sustainability performance on our corporate website Include summary of performance in the 2023 Annual Report Annually update the net zero carbon roadmap Report in accordance with European Public Real Estate (EPRA) Sustainability Best Practice Recommendations 	Retain Gold for EPRA sBPR	Shaftesbury – Sustainability / RPS
E3	Maintain our ongoing engagement with shareholders 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 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 2022 -2023 and retain listing on Dow Jones Sustainability Index Participate in the GRESB survey and increase score 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 	Score in index Listing on Index Score in index Score in index TCFD compliance disclosures	Shaftesbury – Sustainability / RPS

Strategic goal 4.0: 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	Objectives	Management Actions	Key Performance Indicator	Responsibility/ applicable parties
F1	Continue membership of the Business for Societal Impact (B4SI)	<ul style="list-style-type: none"> Maintain ongoing financial support to key charities and community support for 2022-2023. 	Value of support as per BS4I	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 2023. 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 Continue volunteering and coaching schemes to enable our employees to share their experience with local people 		Shaftesbury - Sustainability & CIC
F3	Promote employment opportunities for local people with our occupiers, supply chain and wider property industry	<ul style="list-style-type: none"> Require all principal contractors working on Shaftesbury project(s) with capital value in excess of £1m (cumulative per year) 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

Strategic goal 5.0: Operate in an environmentally sustainable manner and achieve corporate 2030 net zero carbon targets through the sustainable re-use and management of buildings



Policy goal G:

Comply with all legal and regulatory requirements, and where feasible, exceed minimum compliance

Number	Objectives	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 2022-2023 using checklist 		Shaftesbury / RPS / Project managers / CBRE
	Target	<ul style="list-style-type: none"> Ensure there is full environmental compliance for 2022-2023 	Number of non-compliances	All above

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

Number	Objectives	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 best practice guidance as appropriate to the portfolio Achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment 		Shaftesbury / CBRE
			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	Objectives	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"> Work with neighbouring landowners and local authorities to implement air quality solutions and delivery consolidation strategy 		Shaftesbury – FM & Sustainability / CBRE

Policy goal J: Track performance against annual and long-term net zero carbon targets and increase resilience to climate change risks

Number	Objectives	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 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	Objectives	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 refurbishment 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 above £250,000 • Consider the end-of-life treatment of timber to maximise its benefit in sequestering carbon • Define a new target for embodied carbon on refurbishment projects based on research being undertaken. This will be below the LETI 2030 target of 500kg/m² • Require site teams to purchase/ procure electricity from renewable tariffs • Investigate how renewable energy technologies can be incorporated into future projects • Prepare for the move from gas to electricity across the portfolio, where applicable • Develop whole life carbon audit process for any major (above £1m capital value) refurbishments • Increase our understanding of emissions relating to occupiers' fitouts 		<p>Shaftesbury - Sustainability</p> <p>Shaftesbury - Sustainability / Project managers/ RPS</p> <p>Project Managers / RPS Shaftesbury - Sustainability / RPS</p> <p>Shaftesbury - Sustainability / Project Managers 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 (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.

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 		Project Managers RPS to audit Project Managers to ensure contractors retain invoices
		<ul style="list-style-type: none"> Source 100% of timber from a certified sustainable source (FSC / PEFC). 	Percentage of timber from a certified sustainable source	Shaftesbury / Project Managers RPS to audit
	Targets	<ul style="list-style-type: none"> Suppliers to source a minimum of 70% timber from a Forest Stewardship Council (FSC) certified source 	Percentage of FSC timber sourced	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 policies and specification questionnaires in tender documentation 		Project Managers
		<ul style="list-style-type: none"> Procure energy from green supplies for use in refurbishment projects 		
		<ul style="list-style-type: none"> Issue Contractors Induction Leaflets to all contractors working on the portfolio 		Project Managers
K5		<ul style="list-style-type: none"> Monitor and report energy and water consumption on site throughout the life of the project 		Project Managers
		<ul style="list-style-type: none"> Achieve zero reportable environmental incidents 	Percentage of schemes with zero incidents	Project Managers
	Targets	<ul style="list-style-type: none"> Specify 100% low VOC paints, adhesives and sealants to improve air quality 	Percentage of low VOC paints	Project Managers
K6	Improve biodiversity	<ul style="list-style-type: none"> Continue membership of Wild West End. Achieve a minimum of 25% biodiversity uplift by 2025 from 2021 baseline 		Shaftesbury – Sustainability / CBRE / Project Managers to implement

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

Number	Objectives	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 	Percentage reduction across portfolio	CBRE / Shaftesbury
		<ul style="list-style-type: none"> Aim for a 5% like for like reduction in landlord-controlled energy consumption against 2022 	Percentage like for like reduction across portfolio	CBRE / Shaftesbury
		<ul style="list-style-type: none"> Report whole building energy consumption for 95% of the portfolio. 	Percentage reporting	CBRE / Shaftesbury / RPS
		<ul style="list-style-type: none"> Increase the proportion of LED bulbs within common parts of the portfolio and specifically for external lighting 	Percentage of LED bulbs within the portfolio	CBRE
		<ul style="list-style-type: none"> Publish occupier guidelines and responsibilities and support our occupiers to reduce their environmental impact and carbon emissions 		Shaftesbury - Sustainability
		<ul style="list-style-type: none"> Develop an occupier engagement programme to promote low carbon behaviour and encourage data sharing and co-operation 		Shaftesbury - Sustainability
		<ul style="list-style-type: none"> We will adopt or develop energy use intensity targets that relevant to the different types of buildings in our portfolio 		Shaftesbury - Sustainability
L2	Reduce greenhouse gas emissions in line with 1.5 degree aligned 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 	Annual reduction in GHG emissions	Shaftesbury / CBRE
		<ul style="list-style-type: none"> To aim to not exceed 0.05 tonne CO₂e/ m² for the common parts. 	Carbon per m ² not to exceed target	Shaftesbury / CBRE
		<ul style="list-style-type: none"> Purchase 100% green electricity for landlord-controlled supplies 	Percentage of electricity purchased through green energy tariffs	Shaftesbury - Sustainability

Policy goal L: continued.

Number	Objectives	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
				Shaftesbury – Surveyors / CBRE
	Targets	• Monitor water use in Carnaby/Seven Dials' common parts. Aim for 90% reporting of readings	Percentage of coverage	CBRE to collect data
		• Increase coverage of water data collection in the remainder of portfolio	Percentage of coverage	RPS to collate for reporting baseline
		• Aim to reduce like for like water consumption by 5% from 2022	Percentage reduction	
		• Aim for water usage at a maximum of 0.5m ³ /m ²	Water use does not exceed 0.5m ³ /m ²	Shaftesbury / CBRE
L4	Monitor and reduce waste from our properties including our head office	• Reduce water consumption per person in our head office by 5%	m ³ /person % reduction	Shaftesbury – Sustainability
		• Work with tenants to abolish single use plastics throughout the portfolio		Shaftesbury – Sustainability
	Targets	• Divert from landfill 100% of tenant generated waste from Carnaby and Seven Dials	Percentage of tenants' waste diverted from landfill	Shaftesbury/CBRE
		• Recycle a minimum of 60% of tenant's waste at Carnaby and Seven Dials	Percentage of waste recycled	CBRE
		• Aim for 20% compostable waste at Carnaby and Seven Dials	Percentage of waste composted	Shaftesbury / CBRE
		• Aim for 90% recycling in our head office	Percentage of waste recycled	Shaftesbury / RPS
L5	Ensure that contractors comply with hazardous materials policy and materials from non-renewable resources policy	• Issue updated induction leaflet to all contractors working on the portfolio throughout 2022-2023		Shaftesbury / CBRE
		• Document audit trail of contractors		CBRE to keep records RPS to audit

Policy goal L: continued.

Number	Objectives	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 registers are held for the portfolio • Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill 		CBRE to maintain asbestos register CBRE to collate hazardous waste data RPS to audit
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 equipment upgrades where viable following ESOS recommendations • Commission survey for the remainder of the portfolio to identify boilers that could be updated 		CBRE to keep records Shaftesbury – Sustainability Shaftesbury – Sustainability