



# Responsible Investment Policy

2024-25

# 01 INTRODUCTION

**DTZ Investors (DTZI) has been operating in the UK since 1968 and in continental Europe since 1999. As managers of over £9bn worth of assets, we continue to strive toward delivering best practice services to all of our clients.**

Globally, the real estate sector must undergo significant change to support global net zero targets and limit warming to 1.5°C. As managers of large-scale property portfolios, we have both the responsibility and the opportunity to lead this transition and contribute to a more sustainable future.

It is also recognised that we have a fiduciary duty to our clients to achieve the best returns possible from the assets we manage on your behalf within acceptable risk parameters. Achieving those returns should not be at an undue cost to the wider society.

We believe we have a responsibility to manage all assets in a manner that is sensitive to the environment, promotes biodiversity net gain, provides a social benefit and is set within an overarching framework of strong corporate governance. In doing this, we will also be able to minimise any climate related risks that exist within those portfolios and ensure sustainable, long-term returns for our clients.

In 2024, we continued to focus on having an Impact Beyond our Four Walls, building on those foundations set as part of our Responsible Investment strategy. While continuing to target meaningful carbon reductions across our portfolio, we also adjusted our focus to the implementation of onsite PV opportunities to accelerate progress toward net zero and maximise asset value and value to tenants. Our work on generating social value initiatives has also progressed as we continue to embed positive community impact as a core outcome of our investment and management activities.

Our robust climate risk monitoring, management and mitigation process remains a steadfast aspect of the asset management of our portfolio, ensuring that we are able to take proactive decisions against risks identified in portfolio and minimise the impact of against risks; others to maximise the long-term returns associated to the assets under our management.

By focusing on RI and building portfolios that are attractive to occupiers; have minimal running costs and are in-line with a net-zero future, we can maximise returns in the long term and continue to demonstrate a management programme that is aligned with our clients' needs.



*“Having laid the groundwork with clear RI goals, our focus now is on long-term planning and practical delivery. Embracing modern, green technologies is central to turning our ambition into lasting impact, ensuring our assets are actively contributing to a low-carbon built environment.”*

*Chris Cooper, CEO*

# 02

## OUR PRIORITIES

To meet our Responsible Investment commitments and deliver resilient, long-term value for our clients, we have established a clear set of strategic priorities that guide all investment and asset management activity across our portfolios. These priorities form the operational foundation of our RI strategy and inform our asset-level business planning, capital expenditure allocation, and

engagement activities. They are aligned to evolving regulatory frameworks, market expectations, and our net zero targets, enabling us to address key environmental and social risks, while unlocking opportunities that support both sustainable outcomes and investment performance.



### **MEES Compliance**

We consistently manage the risk of non-compliance with real estate efficiency legislation in the regions in which we operate.



### **Net Zero by 2040**

We are on a defined pathway to achieve net zero operational emissions by 2040. This includes setting clear targets, tracking progress, and integrating decarbonisation requirements into all asset management plans.



### **Decarbonisation**

Our investment and asset management strategies are aligned to reduce absolute carbon emissions and intensity across all scopes, through practical interventions such as electrification of heat and phasing out fossil fuels.



### **Renewable Generation**

We are scaling on-site renewable energy generation, particularly solar PV, across suitable assets and continuously assessing opportunities to increase the clean energy capacity within our portfolios.



### **Data Transparency**

We are advancing automated data collection and disclosure processes to ensure accurate, asset-level insights into energy use, emissions, water consumption and waste generation/diversion and wider ESG performance, enabling evidence-based decision making and stakeholder accountability.

# 03

## OUR APPROACH

We have worked hard to ensure that RI is integrated into all our day-to-day activities and across the entire lifecycle of our investments, from acquisition through to sale. It is understood that by doing this, we will be able to meet the changing requirements of our occupiers, the market and our investors. As well as minimising any risks and maximising returns for our clients. By investing responsibly and managing our assets in this way, we also make our buildings more attractive to consumers, employees, business owners and investors.

As climate change increases average global temperatures and the frequency of extreme weather events, it presents a greater physical risk to our assets.

Our strategy focuses on minimising risk and understanding the impact of ESG focused investment principles on future value and wider sustainability outcomes.

We follow a proportional cost-benefit led approach. This does not mean that all initiatives must be self-financing or indeed that there must be a proven economic reward

but means that we will consider the relationship between the financial cost of any investment or activity and our evaluation of RI rewards. Importantly, we will also consider our portfolios in the context of market best practice and 'peer group' properties to guard against depreciation risk and obsolescence.

Furthermore, we are committed to fostering a culture that encourages and enables our employees to deliver against the objectives of our responsible investment policy and delivers clear outcomes.

By recognising the role that the real estate sector has in delivering net-zero across the globe, we also work towards establishing best practice within the sector, supporting other organisations, bodies and stakeholder to drive towards net-zero.

Overall, this approach will help to enhance tenant retention, lower operating costs and minimise the risk to portfolio investment returns presented by climate change, as well as future legislative changes, and obsolescence.

**To help deliver our net zero ambitions, we have built our RI approach on four core pillars;**



### 1. Leadership & Governance

Integrate RI principles throughout our culture, business activities and processes and assign lines of responsibility. Collaborate with government, peers and clients to encourage adoption of RI practices across the industry.



### 2. Investment Process & Implementation

Manage, maintain, upgrade and dispose of clients' assets in an environmentally and socially conscious way, that protects value, the environment and enhances community.



### 3. Stakeholder Engagement

Educate and engage with clients, occupiers, our people and local communities to enable effective decision-making and action that leads to positive environmental and societal impact across all corporate & real-estate activities.



### 4. Benchmarking & Disclosure

Share RI performance against industry benchmarks publicly and identify opportunities for continual improvement.



# 03

## OUR APPROACH

### Compliance

Core to our approach is the requirement to comply with all relevant UK statutory requirements, EU directives and with local planning authorities, and our efforts to go beyond the minimum requirements where feasible.

In addition, we will continue to collaborate with policy makers and government either directly or indirectly

through our RI advisors and contribute to consultations that seek to develop legislation that will enable us to meet our commitments to the Paris Agreement and achieve Net zero by 2050.

### Mandatory Requirements

- The Minimum Energy Efficiency Standards (MEES)
- The Energy Savings Opportunity Scheme (ESOS).
- Sustainable Finance Disclosure Regulation (SFDR).
- Sustainability Disclosure Requirements (SDR)
- Décret Tertiaire 2020.
- EU Taxonomy 2020.
- The Heat Network Metering and Billing Regulations 2014.
- Local Planning Authority Requirements

### Key procedures that support us to remain compliant

- Quarterly legislative updates on key environmental legislation impacting real-estate owners and occupiers.
- Quarterly environmental reporting covering supplies and use of energy across all our assets which provide the basis for calculating our portfolio's carbon footprint.
- Strategic risk management of Energy Performance Certificates (EPCs) ratings against the MEES for England and Wales and Section 63 for Scottish based assets.
- Preparation of asset sustainability implementation plans and EPC+ reports to identify opportunities for energy efficiency in existing assets.
- Publication of refurbishment and development guidelines including occupier fit-out.

### Benefits of RI

- The implementation of DTZ Investors' RI strategy and the overall approach to RI has a number of benefits for our clients, tenants and stakeholders. These can be summarised as follows:
- Effective management of risk
- Driving greater portfolio performance through efficiency
- Active management across our portfolio leading to reduced environmental impact
- Reduced utility consumption across our assets and portfolio leading to reduced costs of occupation
- Future proofing of buildings and assets
- Enhanced levels of stakeholder engagement with occupiers, staff, communities and relevant industry bodies
- Robust and effective approach towards property improvement planning

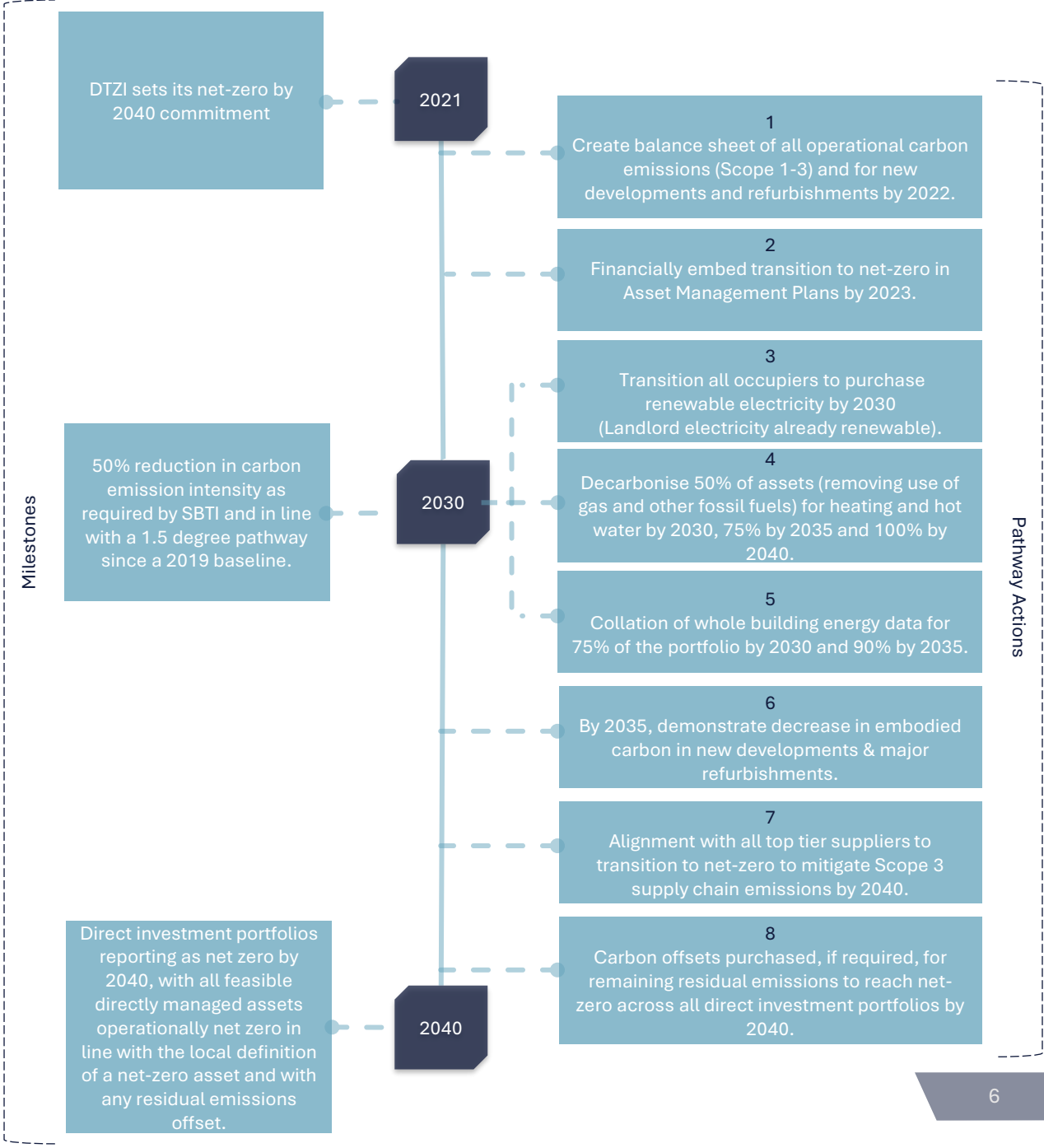
# 03

## OUR APPROACH

### Net Zero by 2040

We recognise that there is responsibility to stakeholders, wider society and the environment to address the challenges and opportunities presented by climate change. In-line our RI ambition, we are committed to align investment activities with the ambition of the Paris Climate Agreement, in an effort to meaningfully contribute to keeping global warming below 2°C and

pursue efforts to limit warming to 1.5°C. Following the UK government legislating its commitment to achieving ‘net-zero’ by 2050, We have committed to reaching net zero carbon by 2040, for all discretionally managed assets, with the objective of reducing operational carbon emissions to zero and reducing embodied carbon during developments and refurbishments.



# 03

## OUR APPROACH

### Social Value Policy

#### Designed To Advance Social Outcomes And Promote Community Well-being

We want to make a positive impact beyond our four walls. A key part of this is embedding social value commitments and targets across our assets and landlord procured activities. We have integrated social value performance indicators into our property management agreement for our portfolio and developed our Asset Improvement Plans to include assessing the feasibility, and targeting the implementation, of tenant and community engagement initiatives for all applicable sites.

- **Baseline:** Conduct baseline social impact assessments using RESVI metrics to assess the social impact of our properties. The intention is to establish a clear starting point to measure the progress of the social impact of our properties as well as identifying areas for improvement. The outcomes of the assessments are crucial in supporting the development of our strategies, at asset level, to promote positive community outcomes and align with our commitment to fostering the kind of impacts intended within the communities we serve.
- **Measurement and Certification:** By using independent certification such as RESVI to guide and inform our social impact strategies, we can tailor our approach to community engagement, health and well-being, and health and safety by using data-driven metrics aligned with best practice. The RESVI framework helps us prioritise the most relevant initiatives by asset types and develop our wider stakeholder collaboration to best meet community needs and consistently stay in line with the leading industry approach.
- **Targeted:** We recognize the opportunity we have and our responsibility to support local communities impacted by our investments. By targeting engagement with local charities and organisations, we aim to build strong partnerships that enable us to understand and address the unique needs of each community where our properties are located. These efforts will provide insights and resources that inform our initiatives in health and well-being, inclusivity and accessibility, and education and training. These initiatives may range from investing in and maintaining green spaces and recreational facilities or implementing well-being building designs and management practices; to ensuring developments are accessible and inclusive, or partnering with local institutions to develop specific opportunities and provide targeted programs that support local employment and skills development. We aim to better align our social value efforts with the priorities of the local community which this collaborative approach enables us to maximise the social impact of our investments.
- **Benchmarking and Disclosure:** By disclosing our social value outcomes in our reporting using relevant social value metrics, we can identify areas for improvement and contribute to industry standards. We will also continue to highlight success stories that showcase positive social outcomes, showing the impact of our initiatives on the local communities.

# 03

## OUR APPROACH

### Biodiversity Policy

#### Promoting Biodiversity Across Our Entire Asset Journey

We recognise the importance of biodiversity as part of our wider sustainability goals in supporting communities and maintaining resilient ecosystems. As part of our RI strategy, we are committed to integrating biodiversity considerations into our operations and developments. Our aim is to measure, protect, and enhance biodiversity within our business operations and properties under our management.

#### Measure and monitor:

- We conduct baseline biodiversity assessments for each property using the Biodiversity Net Gain metric. Our goal is to identify and document all existing habitats, species, and ecological features.
- We plan to monitor changes in biodiversity over time focusing on indicators such as species richness and habitat quality to assess biodiversity health of any key habitats identified.
- And will maintain a database of biodiversity data for our properties.

**Enhance and protect** natural habitats and species on our properties:

- We develop and integrate Biodiversity Action Plans into our Asset Improvement Plans for each property, outlining specific actions to improve biodiversity (Net Gain).
- Our approach includes maintaining our properties with eco-friendly landscaping practices, incorporating green roofs and walls to provide habitats, and the use of native plant species.

**Engage with stakeholders** to promote biodiversity:

- In line with our wider stakeholder engagement commitments, we engage with local communities and tenants to promote biodiversity initiatives.
- And foster community participation in biodiversity projects, such as tree planting and habitat restoration events.

**Comply** with relevant local and national biodiversity regulations and standards:

- As RI regulations around biodiversity evolve, we are committed to ensuring compliance with all relevant biodiversity-related regulations and standards. We will continue to adopt and maintain best practices in our operations to promote Biodiversity Net Gain;
- Include biodiversity metrics and case studies in our ESG reports and communications;
- And report annually to our stakeholders on biodiversity performance.

# 04

## LEADERSHIP & GOVERNANCE

We have integrated our RI approach throughout the entire business and now each stakeholder has a role to play in the delivery of our RI programme. To support this, clear lines of responsibility are assigned, with robust support from the Board to ensure implementation.

To support in embedding RI within day-to-day operations, RI KPIs are set, monitored and reported against at all levels including Board, fund, asset and individuals.

Progress is monitored and reviewed at each level of the business, enabling support to be allocated where necessary and without delay.

**The Board** has accountability and ultimate responsibility for embedding and driving responsible investment, led by the Head of Responsible Investment

**The Responsible Investment Committee (RIC)** has oversight and governance responsibility for objective setting, development of procedures and overseeing the implementation of the RI strategy and policy. This committee holds monthly, quarterly & annual meetings to ensure progress is maintained and that our strategy remains relevant, and impact driven.

**Fund and Portfolio Managers** are responsible for the implementation of our policy and strategy at a portfolio level; reviewing the portfolios strategic objectives and performance on a quarterly and annual basis; and reporting into the RIC and the portfolio's respective Investment Committee.

**Third Party Property Managers** are responsible for the proactive management of properties at the surveyor and facilities management level, governed by our Property Management Agreement (PMA) and Service Level Agreements (SLA).

**Suppliers** are vetted in contract set up and during each contract to ensure our RI approach is embedded.

Reporting is carried out on a monthly, quarterly and annual basis to all levels of the business, as well as clients, to ensure transparency over our RI programme and its progress. For all discretionarily managed portfolios, benchmark reporting is also carried out on an annual basis through GRESB and PRI to demonstrate our performance against peers.

The RI policy is reviewed and updated annually.

### Supporting Policies

Included under this overarching policy is a suite of policies which cover in more detail, key environmental, social and governance issues across our organisational activities. The following policies are available on request and are updated annually:

List of supporting policies:

- Stewardship Policy
- Anti-Bribery & Corruption
- Conflicts of Interest
- Code of Business Conduct
- Health & Safety
- Terms of Business
- Supplier Integrity
- Diversity, Equity & Inclusion
- Third Party Privacy and Confidentiality
- Whistleblower Policy
- Treating Clients Fairly Policy
- Compliance Manual
- Modern Slavery Act Statement

# 05

## IMPLEMENTATION

Following us setting our net-zero by 2040 target, it was clear to us that we needed to demonstrate how we, as a business, could develop and implement a leading strategy to achieve this commitment.

By embedding our RI approach into every part of our asset lifecycle, from acquisition through to sale, we can ensure that we are supporting our target throughout our activities.

We have developed clear processes, tools and checklists to ensure that all stakeholders, including asset managers, property managers and occupants, have all of the necessary information to enable them to make informed decisions that follow the requirements of our RI programme.

With this information, stakeholders are also more empowered to go above and beyond just minimum standards and strive for the achievement of best practice. Something we then look to support others

within the industry to implement.

Every portfolio has a clear set of objectives against which each investment must be considered. These objectives steer the investment strategy and are reviewed on a quarterly basis. The investment strategy includes RI factors, ensuring that every investment is assessed for RI risks and opportunities throughout each stage of the investment life-cycle, including:

- Responsible Investment Strategy
- Responsible acquisition
- Active ownership
- Asset improvement
- Benchmarking and disclosure
- Sales discipline

### Responsible Asset Management Lifecycle



# 05

## IMPLEMENTATION

We believe that we have a fiduciary duty to manage our assets in a manner that is sensitive to the environment, provides a social benefit and is set within an overarching framework of strong corporate governance. In doing this, we create portfolios that are more resilient to climate related risk, obsolescence and changing occupier demands, and more able to benefit from the opportunity that change unlocks, ensuring sustainable long-term performance for our clients.

### **Responsible Investment Strategy and Acquisition & Sales Discipline**

Sustainability and climate risk assessments are carried out at pre-acquisition to identify potential RI risks to future occupation, operations and value. Issues with direct financial relevance or liquidity risk are integrated into the valuation and decision-making process. At disposal, the RI risks are re-assessed to ensure confidence in the sale process with any financial implications understood and mitigated for.

### **Active Ownership**

Our property managers and third-party suppliers must understand and adopt this policy, putting in place the necessary governance procedures to ensure asset performance is monitored, benchmarked, improved and maintained.

Our assets are covered by an Environmental Management System (EMS) to minimise their impact on the environment.

Quarterly RI reporting covering our directly managed assets, reporting on energy, carbon emissions (Scope 1 and 2), energy, water & waste across all our assets which provides the basis for calculating our portfolio's carbon footprint and intensity as an organisation.

All our material assets are covered by a working sustainability implementation plan to identify risk and opportunities to improve the RI performance.

### **Asset Improvement**

We have specific environmental and social guidelines for fit out, refurbishment, major renovations and new developments to ensure our occupiers and contractors consider sustainability at the earliest possible stage.

As a part of the management of all multi-let assets, we implement tailored, asset level sustainability focussed asset improvement plans. These plans provide a clear framework for site teams and asset managers to drive continuous environmental and social performance, supporting the progression of each asset towards net zero and promoting positive impact on local communities. In 2024, these plans have increasingly prioritised the identification and delivery of on-site PV opportunities, enabling assets to reduce emissions and improve energy resilience. Progress is reviewed and reported at the portfolio level on a quarterly basis, ensuring accountability and alignment with our wider Responsible Investment goals.

### **Managing Different Asset Classes**

As managers of diverse portfolios with a variety of different asset classes in different parts of the UK, we understand that we need to be able to adapt our RI implementation approach to suit the needs of different properties.

Therefore, by utilising our policies, processes and tools, such as the tailored asset improvement plans, it is possible to identify, implement and monitor a variety of initiatives at each asset that will support in the maximisation of RI credentials and improvements.

Potential initiatives are screened throughout our investment processes and within key working groups, such as the RIC, in order to ensure that they are suitable for particular asset classes and are supporting our long-term objectives.

# 06

## STAKEHOLDER ENGAGEMENT

We have in place a stakeholder engagement programme that ensures our clients, investment committees, employees and third-party suppliers are supportive of our policy, procedures and targets. For our assets, we have in place a programme which allows us to identify key stakeholders for engagement, communicate effectively with those stakeholders around the aims of the RI strategy to support and drive environmental and social performance at the asset level. As well as increasing the social value generated by our assets.

### Employees

At DTZ Investors we recognise the importance of employee engagement and satisfaction. Engaged employees are happier, both at work and in their home lives, which results in a more productive environment. Our regular employee survey assessments help us to understand which issues are important to the business and our employees, and therefore where and how to focus our engagement initiatives.

Employee training on RI issues is incorporated as part of our quarterly portfolio meetings on RI, where in this meeting, updates on environmental, social and legislative changes are provided along with an update on industry trends. Importantly in these meetings, training on internal RI process and procedures is also provided covering the asset life cycle from acquisition through to disposal.

In order to incentivise employee engagement on RI issues, all employees, including board members, are obliged to set RI targets and objectives, aligned to our RI strategy and the assets we manage, forming part of our annual Employee Objectives Setting Programme. Employees are then encouraged to meet with their line manager to update on progress regularly throughout the year. This engagement and embedding of RI is implemented top-down and supported by the incentivised remuneration based on RI performance.

### Community

Creating value for our communities in and around the assets we manage is something we strongly believe in, and which we constantly strive to find new ways of doing. As such, we will continue to work with communities where we operate, through engagement activities and initiatives that are aligned to local needs or are within the context of wider societal issues.



At Walkergate, we've taken a practical approach to delivering social value. In 2024, we hosted a range of well-attended events with strong stakeholder engagement, including St Patrick's Day celebrations. We also supported Durham Pride by promoting the event through the site's online presence and social media channels, helping to increase visibility.

# 06

## STAKEHOLDER ENGAGEMENT

### Occupiers

Our occupiers play a fundamental role in the environmental performance of our assets. We therefore acknowledge the importance of effective engagement on RI issues. To do this we develop long-term business relationships with the occupiers of our assets. In addition, we annually undertake an Occupier Satisfaction Survey to collect feedback from our occupiers, which enables us to measure satisfaction levels and to identify areas for improvement. Through this, we can better understand their environmental, social and governance needs, which enables us to enhance the service we offer them.

We are also committed to continuing the provision of guidance to our tenants on RI in the form occupier engagement meetings and the distribution of our occupier fit-out guidelines, whilst continuing to work on improving data sharing. Through this engagement, we are also able to better collaborate on RI initiatives, which enables us to operate more effectively and have a greater impact within our local communities.

### Third Party and Supply Chain

We recognise the role that our third-party suppliers and contractors have on the impact of the assets we manage. We have therefore put in place governance processes ensuring that environmental and social performance is reviewed as part of tenders and appointment of contractors. Key expectations include:

- social value commitments (including employability, diversity & inclusion)
- anti-slavery provisions
- real living wage commitments for employees
- environmental policies and commitments
- evidence of responsible and ethical procurement of supplies and materials

- prohibiting all forms of forced and compulsory labour
- prohibit use of child labour.

Our third party and supply chain expectations apply to sub-contractors and suppliers appointed through our third-party property management functions. Once appointed, contractors are expected to continue delivering against our own RI principles, with the contract governed by specific RI deliverables or key performance indicators (KPIs).

### Investees, External Bodies and Organisations

Delivering net-zero and a truly sustainable future cannot be done by a single organisation. These are concepts that need to be delivered at a sector, country and global level.

To support this, we look to engage industry bodies in order to support in the development and sharing of best practice within the real estate sector.

By sharing our own experiences and knowledge and learning with other organisations, we will all be able to accelerate the delivery of net-zero in the real estate sector. For external bodies and organisations this is done typically through the involvement of employees in working groups and policy development. For our investees, we utilise annual RI reviews to benchmark performance and provide feedback on potential improvements.

# 07

## BENCHMARKING & DISCLOSURE

Reporting and benchmarking is an essential part of our RI strategy where disclosure of RI performance to internal and external stakeholders ensures transparency and sharing of best practice. In addition, disclosure allows comparison and benchmarking of performance internally and externally to be undertaken which supports measurement of progress and performance over time. As such, our participation in external benchmarking frameworks such as the Global Real Estate Sustainability Benchmark (GRESB) and the United Nations Principles for Responsible Investment (PRI) has helped inform our strategy and our approach to RI.

We have established a reporting programme to support the effective management of economic, social and environmental performance data across our portfolios.



We became a signatory of PRI in 2013. PRI is a voluntary framework for incorporating RI into investment decision making and ownership practices through the implementation of the six principles for responsible investment:

Principle 1: We will incorporate RI issues into investment analysis and decision-making processes.

Principle 2: We will be active owners and incorporate RI issues into our ownership policies and practices.

Principle 3: We will seek appropriate disclosure on RI issues by the entities in which we invest.

Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.

Principle 5: We will work together to enhance our effectiveness in implementing the Principles.

Principle 6: We will each report on our activities and progress towards implementing the Principles.

This reporting programme provides understanding of performance throughout the year. An effective reporting programme helps us to achieve our RI objectives by determining good and bad performance. This includes potential areas of waste, which in turn improves the resilience of buildings and reduces operational costs.

We use benchmarking tools such as the Real Estate Environmental Benchmarks (REEB) to measure performance against industry standards. Understanding our performance against industry standards supports to develop our portfolio objectives and targets.

RI performance is reported quarterly and annually.



GRESB provides a benchmark assessment that is used by Institutional Investors to understand and compare the effective responsible management of real estate assets across investment portfolios. GRESB assesses '7 Aspects' of RI, scoring each Fund's response in the submission process and providing a score on the Fund's overall approach to RI.

We have been a member and participant to the (GRESB since 2015. The GRESB reporting framework has helped to develop our approach to RI through peer benchmarking and analysis of performance annually.

The applicability of a fund's participation in GRESB is reviewed on an annual basis, in line with each fund's overall strategy.

# 07

## BENCHMARKING & DISCLOSURE



The Task Force on Climate Related Financial Disclosures (TCFD) recommendations support companies to articulate how their business model preserves value against relevant climate related risks. This requires companies, like ours, to effectively identify, monitor & respond to these risks across the property lifecycle over time, whilst taking advantage of any identified climate related opportunities.

We are committed to integrating the recommendations of the Financial Stability Board's TCFD into our responsible property investment approach and as such publicly supports it. Governance and processes have been put in place to support the identification and monitoring of our exposure to climate related risks and opportunities across our business and our client's assets in order to preserve value.

We report annually on our progress in implementing the recommendations of the TCFD.

As a part of our RI programme, we have developed a regular internal reporting programme. This enables us to monitor, review and demonstrate progress against our RI programme and objectives.

DTZ Investors hosts monthly RI Committee meetings to ensure visibility over the programme at all levels within the company. Alongside this, quarterly reporting is done at a fund level within the company and to our clients. Each year we report publicly through our annual RI report.

All reporting ensures not only complete transparency on the successes of our organisation but it also ensures that we continue to make significant progress towards our over arching RI targets.

4 quarterly  
investor reports  
per fund per  
year

12 RI  
updates  
provided  
each year

Annual  
reporting to  
GRESB and  
PRI

Annual RI  
reporting made  
publicly  
available

# 08

## STEWARDSHIP

We believe that the delivery of maximised sustainable long-term returns is supported by a focus on responsible stewardship, responsible investment and the management and mitigation of risks within the portfolio. This will also enable the maximization of environmental and social value generated across our portfolio.

In order to achieve this, we look to be active owners by leveraging our influence over our assets, stakeholders and third parties. This includes both a top down and a bottom-up approach, ensuring that our commitments, policies and processes are embedded throughout our organization and all employees hold responsibility for this.

Our stewardship approach closely follows the principles of the UK Stewardship Code set out by the Financial Reporting Council.

We apply the principles of the FCA guidelines regarding TCF (Treating Customers Fairly) to operations. Along with following these guidelines, the nature of our Multi-Manager client portfolios and variability of our units does mean conflicts of interest are rare. Actions, however, are in place to prevent them. Investments are always marketed through an open exchange or brokerage platform, so we can be confident that transactions have been based on market exposure via a third party, rather than a one-to-one arrangement between two in-house managed funds.

Along with financial stakeholders, our due diligence policy sets out guidelines to make sure we are doing business correctly to prevent any other conflict of interest and other suspicious and transactions, so they are detected and reported. We undertake a risk-based approach to due diligence to understand the type of stakeholder, the nature and extent of the contemplated relationship, local law requirements and risk profile of the country in which the transaction is contemplated. We also look at government interactions and whether they sit as a government official.

We prohibit any gift, payment, or other benefit offered or given to a government official directly or indirectly, with the intention of obtaining or retaining a business advantage. Before interacting with a government official, we employ a FIT test to apply good judgment on certain scenarios. Prior approval must be given in order to give unsolicited gifts or entertainment/hospitality.

We also don't make political donations or engage in lobbying, we ensure that we do not loan resources to make direct or indirect contributions to candidates for office or political organisations, do not coerce other employees or business partners to participate in political conversations, actions or campaigns, always make it clear your political views and only attend political function on behalf of the company.

Independent Investment Committees ("ICs") ensure that any proposed transaction (both sale and purchase) is subject to an independent review and approval, while value committees ("VCs") approve whether the transaction price being proposed represents a fair marketed price for the trade. Team members either side of the transaction are also required to always treat information with utmost confidentiality. Along with preventing conflicts of interest, these practices help to remove the possibility for attempts at bribery and corruption in our system and help sustain good relationships with investees.

Further details on our approach to stewardship and compliance with the FRCs Stewardship Code can be found in our [Stewardship Policy](#).

# 09

# UN SUSTAINABLE DEVELOPMENT GOALS

In developing its approach to RI, we have considered the UN global agenda for 2030 in the form of the Sustainable Development Goals (SDGs), adopted by the United Nations in 2015. We have prioritised five SDGs that have the most material relevance to our business informing our strategy going forward and where we can continue to

make the greatest relative contribution to both a sustainable future and human rights. Our sustainability outcomes will be measured against the SDG's to ensure progress against them is on track.

## SUSTAINABLE DEVELOPMENT GOALS



**Ensure healthy lives and promote wellbeing for all at all ages.**

Engage employees, occupiers and local communities in the workplace, and in and around our assets on health & wellbeing and workplace safety



**Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.**

Value our employees and support occupiers through management of real-estate to provide suitable workplaces, and manage our supply chain to ensure responsible and ethical working practices across all our business operations



**Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.**

Develop, renovate and operationalise assets sustainably.



**Make cities and human settlements inclusive, safe resilient and sustainable.**

Revitalise our assets through placemaking and adding sustainable value.



**Take urgent action to combat climate change and its impact.**

Continue to commit to environmental stewardship and reducing environmental impact of the assets we manage on the behalf of our clients.

\* Source: Transforming our world: The 2030 Agenda for Sustainable Development

During the management of all assets, we target key areas sustainability outcomes to support the improvement of environmental and social impact



**Climate Change Risk**



**Waste Production & Disposal**



**Renewable Energy**



**Occupier Satisfaction**



**Indoor Environmental Quality**



**Improved Resistance to Disaster**



**Social Value Generation**



**Net-Zero**



**Carbon Emissions**



**Stakeholder Health & Wellbeing**



**Biodiversity & Habitat**



**Health & Safety Procedure**



**Energy Usage & Intensity**



**Air Quality Management**



**Transport & EV Charging**



**Fair Labour Practices**



**Water Efficiency**



**Sustainable Procurement**



**Stakeholder Engagement**



**Diversity, Equity & Inclusion**



# 10

## TARGET SETTING

RI targets and objectives have been established to encourage property improvement, asset performance and stakeholder engagement.

been reviewed with the aim of achieving continual improvement in the environmental performance of our buildings and our evolving our future-focused approach to RI.

As we are 5 years on from setting the targets, these have

Alignment to Pillar	Target
Environmental* 	<p>Following completion physical risk scenario modelling for each of our managed portfolios, we intend to conduct long-term scenario modelling covering physical and transition risks across multiple climate scenarios.</p> <p>Reduce landlord-controlled carbon emission intensity (by floor area) by 50% by 2030 from a 2019 baseline, with improvements embedded in business planning cycles.</p> <p>Phase out fossil fuels used for space heating and hot water across all directly managed assets to be: 50% fossil-free by 2030, 75% by 2035 and 100% by 2040</p> <p>Target net zero carbon across all assets by 2040, aligned with our decarbonisation pathway.</p> <p>Ensure 100% of new construction and major refurbishments target BREEAM certification (or equivalent), including Life Cycle Assessment (LCA) integration at concept and detailed design stages by 2030.</p> <p>Deploy automated or smart metering on all landlord-controlled utilities by 2030 to enable accurate performance tracking.</p> <p>Collect and track tenant related carbon, energy, water and waste impacts. 75% collection rate by 2030, and 90% by 2035. (remaining 10% based on low energy consuming tenancies and estimation)</p> <p>Zero Waste to Landfill &amp; recycling rate of 75% for landlord-controlled waste by 2025. Achieve a collection rate of 50% of occupier waste and diversion by 2030.</p> <p>Reduction in water usage by 10% from a 2019 baseline by 2025 and implementing water re-use and recycling across landlord supplies by 2030.</p>
Social Impact 	<p>Embed social value commitments and targets across all portfolios and landlord procurement activities through our operations and third party appointed Property Managers</p> <p>Embed our RI Development &amp; Refurbishment Framework in all projects with external project managers</p> <p>Engage all occupiers on environmental impact through data sharing and distribution of occupier guidance &amp; tenant fit-out guidelines</p> <p>All assets, where public realm and place making is a strategic objective in the asset plan, ensure there is a dedicated tenant and community engagement plan</p>

# CONTACTS



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