RESPONSIBILITY

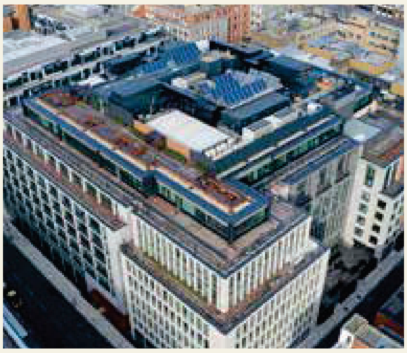
Understanding and balancing the environmental, social and governance issues specific to our business is fundamental to operating responsibly. We believe this approach enables us to continue to deliver long-term value for all our stakeholders.

ESG REPORTING STRUCTURE AND 2021 HIGHLIGHTS

ENVIRONMENTAL

Pages 52 to 75 →

- Climate change
- Net zero carbon
- Our journey to COP26
- Office buildings' energy performance



In 2021 we introduced processes to monitor and track our progress to be net zero carbon by 2030, we surveyed our occupiers on their own ESG plans, attended COP26 highlighting our plans for renewable energy on our Scottish land and commissioned a detailed survey of the costs involved in upgrading the portfolio to EPC B by 2030.

7%
Reduction in like-for-like water consumption

3%
Reduction in landlord emissions

SOCIAL

Pages 56 to 75 →

- Our people
- Community, occupiers and other stakeholders
- Health & safety

Health, wellbeing and safety of our staff and people in and around our buildings remained a core focus. In addition, we achieved a strong National Equality Standard result, conducted our fourth independent biennial employee survey and supported our communities through our Community Fund, sponsorships and donations.

"The delight and enthusiasm from pupils is palpable! This is an exciting new initiative for us at Mousetrap and we are so grateful to Derwent for making it possible"

Mousetrap Theatre Projects

GOVERNANCE

Pages 64 to 75 →

- Climate change
- Green finance
- Supply chain
- Human rights
- Tax

During 2021 we hosted in-person stakeholder and investor days, received independent assurance of our green finance reporting and continued mandatory compliance training across the Group.

42%
Women on the Board

4
Employee representatives on the Responsible Business Committee

ESG in our business

Derwent London takes a responsible approach to business by seeking to maximise our positive impact on stakeholders, while minimising the negative ones. Our long-term approach to investing in London 'villages' and fostering relationships with our occupiers, supported by innovative design, combine to provide us with a platform to make a meaningful impact.

We recognise the importance of transparent and independently assured reporting and the need to be bold, such as being the first UK REIT to publish its Net Zero Carbon Pathway. We continue to learn, and recognise the importance of working with our stakeholders and others across our industry to achieve the best results.

We also know that this discipline is fast evolving which means our frameworks need to follow suit. Within our industry we are in a relatively good position to adapt as we are well resourced and have the relevant experience and expertise.

ESG is embedded throughout our business to ensure its effectiveness. Although ESG aspects are often discussed individually, they need to work together to maximise our impact on society and the environment. This broader view improves our ability to manage risk and creates value for all our stakeholders.

Our latest Responsibility Report is available to download at **https://rr.derwentlondon.com**

2021 RATINGS

GRESB (Global Real Estate Sustainability Benchmark) 2021 – score of 81, Greenstar status, 'A' rated public disclosure

CDP 2021 – 'C' rating

ISS Oekom – Prime status

MSCI – 'AA' rating

EPRA Sustainability Reporting Awards 2021 – Gold award

OUR 7 ESG PRIORITIES

Our Responsibility Policy and Strategy (available on our website) sets out what operating responsibly means to us. There are seven long-term priorities intrinsic to our business and the needs of our stakeholders:

1. DESIGNING AND DELIVERING BUILDINGS RESPONSIBLY
2. MANAGING OUR ASSETS RESPONSIBLY
3. CREATING VALUE IN THE COMMUNITY AND FOR OUR WIDER STAKEHOLDERS
4. SETTING THE HIGHEST STANDARDS OF HEALTH AND SAFETY
5. ENGAGING AND DEVELOPING OUR EMPLOYEES
6. PROTECTING HUMAN RIGHTS
7. SETTING THE HIGHEST STANDARDS OF CORPORATE GOVERNANCE

Clear and robust measurement and reporting underpins our work. We adopt a variety of reporting frameworks enabling our performance to be measured across different ESG platforms (see page 66).

Our environmental, health and safety and green finance data is assured at the reasonable level by Deloitte LLP. Our auditor's opinions can be found with their assurance statements in the latest Responsibility Report **(https://rr.derwentlondon.com)**.

RESPONSIBILITY CONTINUED
ENVIRONMENTAL

Incorporating the right environmental and climate change measures across our business enables us to operate responsibly and mitigates potential negative impacts.

2021 HIGHLIGHTS

- Published revised Responsible Development Framework
- Conducted net zero carbon occupier survey
- Established building specific operational energy targets in line with 1.5ºC science-based scenario

Climate change
Global warming is a material issue for our business and society. In 2020 we published our Net Zero Carbon Pathway which sets out how we intend to lessen our impact on climate warming. We use the Task Force for Climate-related Financial Disclosures (TCFD) recommendations and reporting framework to demonstrate our approach to managing climate-related risks (see pages 68 to 73).

Net Zero Carbon Pathway
2021 marked the first full year following the release of our Net Zero Carbon Pathway, which is aligned to the Better Buildings Partnership (BBP)'s Net Zero Carbon Pathway Framework.

As part of our commitment, we analyse our activities to ensure we are reducing our carbon footprint across all our spheres of influence. Our strategy focuses on three principal areas: investment portfolio, development pipeline and corporate activities.

The Group reports annually on its progress towards net zero by 2030. A brief outline of our 2021 progress is set out below and a more detailed review can be found in our Responsibility Report. In addition, since 2018, we have disclosed our energy performance at portfolio and individual asset levels, as well as the embodied carbon of our latest developments (see Responsibility Report).

2021 Progress
The focus for the year was to put robust processes in place to enable us to monitor and track our progress towards being net zero carbon by 2030.

Investment portfolio
Commitment
Our investment portfolio, including both managed and unmanaged properties (see glossary), will be operated on a net zero carbon basis by 2030. This involves driving down our energy consumption significantly, upgrading and retrofitting some of our properties to remove gas use and improve efficiency, as well as collaborating with our occupiers.

Progress
Scope 3 (see glossary) emissions are a significant part of our carbon footprint. Steps taken to address these in 2021 included:

- Setting building specific operational energy targets aligned with a 1.5ºC scenario. This provides an annual roadmap for each building to reach its 2030 targets
- Undertaking an EPC report to identify energy savings and to ensure we are meeting the Minimum Energy Efficiency Regulations for 2023 and 2030
- Recognising that collaboration is the way to achieve the best net zero outcome, in September 2021 we launched a net zero carbon occupier survey (see page 12) which focused on getting a better understanding of how we can support our occupiers to achieve their net zero goals

A key message from the survey is that our occupiers are keen to work with us. This was evident in the engaging questions they raised such as: 'where do we start', 'where do the landlord's emissions end and occupiers' begin', and 'how do we integrate carbon reduction into day-to-day activities'.

The benefit of getting this level of detail from a wide spectrum of occupiers is that it helps us identify where to concentrate our efforts. Some easy wins include informing our occupiers of what we're already doing, such as providing renewable electricity. We can also share with them details of our key facilities management collaborators who support sustainable operations.

6-8 Greencoat Place SW1
EPC rating raised from E to B in 2021

19-35 Baker Street W1 is the Group's first NABERS-UK project

Our occupiers are at different stages of their journeys, and this survey was for many the first step in working together with us. In 2022 we will use the survey results, as well as follow up conversations, to guide our actions so that together we can help lower operational carbon.

Development pipeline

Commitment

New developments and major refurbishments will be net zero carbon on completion. Embodied carbon produced in the development process will be offset and the buildings will be operated using renewable energy and have appropriate energy reduction targets in place.

Progress

In April 2021, we published our updated Responsible Development Framework, which sets new net zero minimum requirements for our developments. This includes, but is not limited, to:

- Designing and constructing our buildings for operational efficiency. We have set a minimum NABERS UK 4-star rating for future schemes
- Consideration of embodied carbon assessments and lower carbon design options, including refurbishment
- Lower operational water consumption targets
- Assess feasibility of suitable renewable technology
- Carrying out post completion evaluations 12 months after full occupation

We understand the whole industry needs to make significant changes in the next decade if we are to collectively meet our net zero carbon commitments. Therefore, when setting standards for our new projects, we emphasise engaging with other stakeholders so that together we can have a stronger impact. Throughout 2021 we spoke to many contractors to understand what was possible, as well as the challenges presented by the use of innovative materials such as low carbon or cement-free concrete or cross-laminated timber. This work continues as we seek to better understand the impacts of using non-traditional materials.

In H2 2021 we set embodied carbon targets based on our own experience since 2013, as well as industry guidance. A development's embodied carbon, particularly the building's structure, makes up a significant part of the carbon footprint. We work closely with our design and construction team to assess and reduce this. However, we recognise that the supply chain will also need to adapt to fully achieve our aims. Therefore, our targets are phased as follows:

- Commercial Office New Build developments completing from 2025: $\leq$600kgCO_2/m^2
- Commercial Office New Build developments completing from 2030: $\leq$500kgCO_2/m^2

We are also introducing targets for our major refurbishments, which will be based on our latest projects, as well as industry standards.

RESPONSIBILITY CONTINUED ENVIRONMENTAL

Corporate activities

Commitment to renewable energy

Our commitment is to ensure that all the energy we procure is from renewable sources (both electricity and gas).

Progress

We continue to procure 100% renewable, REGO backed electricity. To date 23% of our gas supplies are from green gas sources and we are reviewing how we can increase this. Other activities during the year included:

- Our renewable energy feasibility study continued
- Submitted planning application for an 18.4MW solar park at Lochfaulds Farm. Subject to planning permission, this could provide the equivalent of 43% of the electricity needs of our managed portfolio based on 2019 consumption

Commitment to offsetting

Where we are unable to manage out or eliminate carbon from our business activities these emissions will be offset using robust, verified carbon offset schemes.

Progress

In 2021 we completed the following schemes and offset the residual carbon through our provider Natural Capital Partners:

- 19-23 Fitzroy Street – 180 tCO_2e
- 3-5 Rathbone Place – 161 tCO_2e
- 6-8 Greencoat Place – 763 tCO_2e
- DL/78 – 93 tCO_2e

The adopted scheme related to reforestation projects in East Africa and is validated under VCS and CCB.

We are also looking at offsetting in the UK. We planted 30ha of trees in Scotland in 2015 and have now received our first carbon offset credits. We are investigating planting a further 425ha across our Scottish land (equivalent to 794 football fields). Assuming only half our plans prove to be feasible, 25 years after planting the sequestered carbon from this woodland would be sufficient to offset over four years of our current anticipated annual residual emissions across the whole portfolio.

For a more detailed breakdown of our pathway see our Responsibility Report.

Paul Williams being interviewed on COP TV

Our journey to COP26

Over its 26-year history the Conference of the Parties (COP) has been the central forum driving nations' progress in dealing with climate change. COP26 was the first time the conference was held in the UK and businesses and policy makers were brought together to galvanise efforts to limit global warming to 1.5ºC.

The run up to the conference enabled the Group to learn from and broaden its contacts with leading experts and other businesses tackling climate change, as well as highlighting the work going on across our industry. As part of this, we shared our own experiences of our net zero carbon journey to date. This work continued throughout the year with some Directors and members of the Sustainability team sitting as panellists in virtual conferences or contributing articles to various journals. In these, we gave insights into our recent work in the portfolio and green finance, often supported by occupiers or funders. The overriding theme was the importance of collaboration to optimise environmental outcomes. This was also the theme of our Stakeholder Day where we explored mutual opportunities to best effect change.

At COP26 itself we highlighted the work we are undertaking locally on our Scottish land as part of our net zero carbon journey. Two examples are our plans for a solar park which, if successful, could power up to 6,300 homes, and the potential expansion of our tree planting programme. In addition, during the dedicated 'Cities, Regions and the Built Environment' day, our Chief Executive Paul Williams, presented in the conference's main discussion arena.

Whilst the conference failed to achieve a commitment by all nations to limit global warming to the 1.5ºC scenario, more progress was made in climate change reporting with the decision to set up a system of universal sustainability disclosures which will be governed by International Financial Reporting Standards (IFRS). This will lead to improved transparency and consistency across the global economy.

For further details of our carbon data and climate-related disclosures see pages 67 to 75 and our Responsibility Report.

OFFICE BUILDINGS' ENERGY PERFORMANCE – LOOKING TO THE FUTURE

To address the significant part the built environment plays in the UK's carbon footprint, the UK Government consulted on the desired levels of buildings' minimum energy efficiency. It concluded that from 2030 the minimum energy performance certificate (EPC) rating should be increased to B (from E in 2023). This represents a major transformation, as the average EPC rating across London's office properties is currently D. The outcome was not unexpected and tighter legislation is included in our risk analysis. During 2021 we commissioned a comprehensive report of the feasibility and costs of achieving a minimum grade of B across our portfolio by 2030, as well as identifying those properties that could become stranded as a result of not being able to be upgraded.

The report concluded that the estimated costs of improvement were c.£97m, in line with our previous guidance, and with no building expected to be stranded. The majority of these additional costs relate to upgrading lighting to LED, new on-floor equipment, such as fan coil units, and replacing heating and cooling plant.

We envisage a proportion of these costs will be recoverable from service charges and some elements have already been included in our valuations. We believe that the initial costs will be offset by the benefit of higher future income returns.

In addition to raising the minimum EPC rating, the government is also consulting on the proposed introduction of a building performance standard which would enable public disclosure of a building's actual energy performance, similar in approach to the Display Energy Certificate (DEC). Like the EPC changes, we believe this will become a feature of the property market. Within the BBP we helped bring an established Australian scheme, NABERS, to the UK. NABERS works on a rating system of 1-6 stars, with the score independently verified in operation. Our 19-35 Baker Street scheme is one of the first UK projects to adopt this system. Also, as a corporate target, we have set a minimum 4-star rating on all our new schemes.

Francis House SW1
Targeting EPC B in 2022

Environmental performance in 2021

Carbon

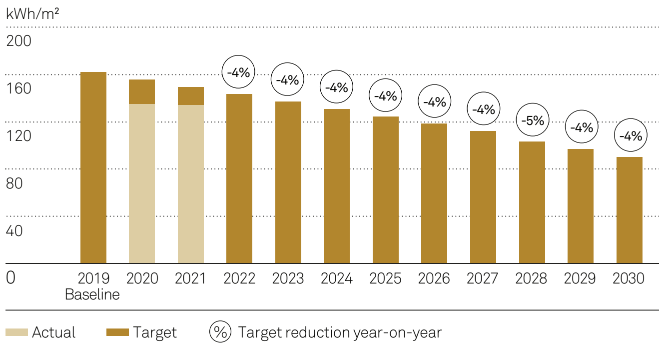
Overall, 2021 saw a double digit rise in re-occupation numbers. This led to a slight increase in energy intensity, however, we are benefitting from the decarbonisation of the grid and the start of our transition to all electric heating and cooling systems, and therefore saw a 3% reduction in our Scope 1-3 emissions (based on Scope 1 and 2 market-based emissions). For more information see the Responsibility Report.

Energy

Our total energy consumption (including tenant and landlord) increased by 1%. In 2021, our Asset and Property Management teams continued to work closely with our tenants to understand their work from home plans, reviewing our chiller strategies to divert services to only active or occupied zones where possible and enhanced optimisation of plant schedules. The impact of increased occupation was offset by the disposal of Angel Square and demolition of the existing buildings on the 19-35 Baker Street development. As a result, we remain within our 2021 and longer-term energy reduction targets (see below).

A positive step is that our landlord-only electricity consumption decreased in 2021, benefitting from the management of our partly occupied buildings, whilst tenant electricity consumption (lighting and small power) increased significantly, emphasising the importance of our occupier engagement strategy which we will continue to develop over 2022.

Total building energy intensity



Source: Derwent London

Water

In 2021 our water consumption intensity increased by 3% compared to 2020. This closely follows occupancy levels, in so far as from April to December last year our water consumption was up from 2020, however, January-March levels in 2021 were significantly below the pre-covid levels of early 2020.

Waste

Our recycling rate was 65% compared to 66% last year. The majority of recyclable waste comes from occupier waste streams, i.e. food waste, coffee cups, paper, packaging and glass. As a result, our recycling rate remains below our 75% target. This is expected to improve with higher re-occupation levels, and will be a focus for our occupier engagement strategy for 2022.

RESPONSIBILITY CONTINUED
SOCIAL

OUR PEOPLE

We aim to attract, inspire and engage a talented and diverse workforce, one that flourishes and is proud to work for Derwent London.

2021 HIGHLIGHTS

- Received National Equality Standard accreditation, our results placed us in the top 5% of all companies surveyed
- Voted top in the sector and 38th overall in Management Today Britain's Most Admired Companies
- Conducted our fourth biennial independent employee survey
- Completed 'Fit for The Future' programme for third group of employees
- Maintained health and wellbeing initiatives and increased our mental health champions' network

11
Internal promotions during 2021

89%
Employee retention rate

Staff survey

88%
Agreed

"I feel that I can make a valid contribution to the success of Derwent London"

81%
Agreed

"I feel that the Company is committed to ensuring the health and wellbeing of employees"

Health and wellbeing

2021 was another unusually challenging year and we have all been affected by the pandemic in different ways. Our teams worked extremely hard in difficult circumstances and we remained focused on safeguarding and supporting the health and wellbeing of our employees.

We provide our employees with a range of benefits, services and support whilst encouraging them to take a proactive role in their own wellbeing. We continue to ensure individual physical and psychological safety and to embed 'agile' ways of working to ensure our employees have a good work-life balance.

Prior to returning to the office, we updated our office protocols and implemented a compulsory 30-minute online induction course to present our Covid-19 safety measures. These protocols continue to be regularly reviewed with updates clearly communicated. Our recent employee survey found 81% of respondents believed that 'the Company is committed to ensuring the health and wellbeing of employees'.

Other activities focused on resilience and all aspects of positive wellbeing (physical, psychological and financial) including:

- Our Occupational Health provider presented on various topics including long Covid, vaccines, variants, responsible behaviour and supporting others
- The Group's intranet provided newsletters, podcasts and webinars, as well as links to websites, mental health charities and other services
- Care packages were sent to employees living alone, single parents or those in caring roles
- Over 10% of employees are now trained as Workplace Mental Health First Aid Champions
- Separate 'Men's Health' and 'Women's Health' workshops were conducted and well attended
- A financial wellbeing seminar was run by our pension providers
- Social Committee events restarted in person, enabling relationships to be built in a relaxed environment (especially important for new joiners)
- Several 'lunch and learn' sessions were run including topics such as mental health (run by a TED talk speaker), resilience and boosting happiness
- Continuing involvement with community projects and volunteering (see page 61)

Going forward, we continue to review workloads, encouraging a good balance between work and personal commitments, whilst fostering wellbeing and mental health.

DL/ 78 Customer team. DL/78 hosted a number of staff and customer events during the year

Diversity and inclusion (D&I)

Derwent London is a respectful employer that welcomes diversity and promotes equality, acceptance and teamwork. It is important that we create an inclusive workplace in which our people can bring their whole selves to work, feel valued and be able to make a genuine impact.

The Group's belief in 'diversity of thought' extends beyond the traditional facets of gender, ethnicity, age and sexual orientation to include personality, communication and work styles. We recognise that diversity enriches our creativity and adds value for our stakeholders.

Our gender diversity data can be found on page 171.

D&I strategy topped our agenda in 2021 as we worked towards achieving the National Equality Standard (NES). Seven areas were assessed by EY: core components, talent, business, people, leadership, relationships and review and measurement. In December, we were delighted to be recognised for our commitment (see page 58).

Our strong result reflected the passion and hard work of our people who are committed to strengthening our D&I culture. We continue to embed these ambitions throughout the business, whilst regularly reviewing and measuring our progress and impact on all our stakeholders.

"It was an absolute pleasure working with Derwent London on their National Equality Standard assessment. Derwent London has made enormous strides, embracing leading D&I practice across the NES framework. Derwent London's certification, and the amount of work that has gone in to achieving it, pays testament to the importance it places on having a diverse and inclusive workplace culture."

Simon Manterfield,
Senior Manager, EY

2021 D&I FOCUS

- Developed a comprehensive D&I strategy
- Internal promotions, effective from 1 January 2022, improved the gender diversity of the Executive Committee and achieved the Hampton-Alexander Review target (see page 147)
- We are compliant with the Parker Review in respect of Board ethnic diversity in advance of the 1 January 2024 deadline (see page 147)
- Enhanced existing generous family-friendly policies, including 26 weeks full pay for maternity, adoption and shared parental leave
- Continued unconscious bias awareness training for all staff in collaboration with Chickenshed
- Nurtured a culture of transparency and openness to encourage people to raise concerns and speak out about bias or discrimination
- Continued to offer Parental Transition Coaching for employees before, during and when returning from an extended period of leave
- Encouraged women into our industry through work experience and mentoring opportunities
- Maintained a diversity dashboard to better understand our own business and whether key talent processes are delivering equitable outcomes for different demographics within Derwent London
- The Executive Committee attended Inclusive Leadership Training to give them the tools and techniques to manage diverse teams and personalities
- Our 'Fit for the Future' programme was enhanced to include an Inclusive Management module
- Actively promoted D&I via the website and social media
- Incorporated D&I into our supply chain questionnaire to ensure best practice

Given these initiatives, it was encouraging to see the results from our recent employee survey regarding D&I and the positive impact that this has had throughout the company (see the case study on page 59).

The Social Committee arranged a football tournament with Derwent London's stakeholders

RESPONSIBILITY CONTINUED
IMPACT OF OUR DIVERSITY & INCLUSION WORK DURING 2021

"Derwent London should be immensely proud of their National Equality Standard certification, not only because of their achievement itself but also because they responded to EY's feedback with absolute rigour and determination and as a consequence their results are some of the best we have ever witnessed."

Arun Batra,
CEO and founder of the UK National Equality Standard.

D&I Working Group receiving our certificate from Arun Batra

Our initial National Equality Standard assessment by EY took place between October 2020 and February 2021. This provided us with an independent review of our Diversity and Inclusion (D&I) policies and practices, with recommended areas for improvement.

Over the next 10 months a new D&I Working Group established clear priorities promoting D&I within Derwent London through detailed measures setting out responsibilities and KPIs with timelines. We have now been accredited with a result which places us in the top 5% of the c.400 companies surveyed.

The latest employee survey carried out in October 2021 included questions on D&I to establish what impact our work has had over the past 12 months. For the first time the survey asked participants for their gender, ethnicity, disability and sexual orientation as well as open D&I comment boxes. The results are anonymous and included a 'rather not say' option.

Given our recent work it was pleasing that 87% of respondents believed that the 'Directors visibly support the Company's commitment to D&I'. Progress was also reflected in that nearly half of respondents agreed that 'the work on D&I over the past 12 months has made them think differently and/or had an impact on them personally.'

Other positive results found:

- 82% agreed 'Derwent London was an inclusive place to work'
- 84% agreed 'I feel I can be myself at work'
- 84% felt 'able to speak up in my team if I witnessed or experienced behaviour which was not inclusive or respectful'

We also asked our employees to describe the culture of Derwent London. The most mentioned words were 'passionate', 'reputable', 'hard working' and 'professional.' Other attributes where the profile increased substantially from previous years were 'inclusive' and 'diverse' which is encouraging in light of our recent initiatives.

RESPONSIBILITY CONTINUED
SOCIAL

Staff survey

94% Agreed
"I am proud to work for Derwent London"

87% Agreed
"I would recommend Derwent London as a great place to work"

90% Very satisfied or satisfied
Overall satisfaction with working for Derwent London

Employee engagement

Our culture stems from our values and is a key strength of the business. We stress the importance of inclusivity, collaboration, and professionalism to help build long-term relationships with our colleagues and other stakeholders. Employee engagement and communication is very important. We have an 'open-door' policy and are fortunate 80% of our employees are based at our head office, 25 Savile Row W1, which enables effective, face-to-face interaction. These factors, together with a range of formal and informal communication channels (see page 135), have created a highly engaged workforce.

During 2021, we continued to ensure open lines of communication to enable our employees to stay positive, connected and productive, whilst feeling valued and supported.

A valuable method to gather feedback and assess engagement, is our independent biennial employee survey. The latest survey was in Q4 2021 and we were delighted to achieve a 97% response rate which, we believe, demonstrates an open culture. The results were equally positive with 94% agreeing that they are 'proud to work for Derwent London', 87% 'would recommend Derwent London as a great place to work' and 88% 'enjoy their day-to-day role'.

Our CEO leads monthly virtual town halls, supported by Directors and our Head of HR. These meetings provided updates on strategy, performance and initiatives, as well as Q&A sessions, team presentations and several excellent guest speakers. We intend to continue with these following the survey feedback as 96% of respondents 'find the town hall gatherings useful' and 80% feel 'adequately informed about our strategic direction'.

Attracting and optimising talent

We recognise that our employees are essential to the success of the Group, therefore aim to create a culture which enables our talented and diverse workforce to thrive. Derwent London stresses the importance of staff feedback and encourages regular performance conversations with line managers throughout the year, in addition to formal biannual reviews.

The Group supports our employees to develop and grow their careers. There were 11 internal promotions in 2021 including a new Executive Director. In addition, a further eight promotions were made from 1 January 2022, including three new Executive Committee members. Comprehensive learning and development programmes cater to all levels. These include a suite of core skills training, our induction programme, internal technical workshops, 1-1 coaching, mandatory compliance training (see page 161), bespoke building manager training and 360° feedback.

Our 'Fit for the Future' programme has been running for three years and is an important aid to succession planning. To date, 51 employees have benefitted. Each group is mentored by a dedicated coach and sponsored by two members of the Executive Committee. The latter are heavily involved in the design and content of each module which includes personal development, negotiation skills and collaboration. The modules are supplemented with one-to-one and group coaching sessions. The programme will be reviewed during 2022, with the aim of relaunching in 2023.

Although we have a good record in recruiting from a diverse range of candidates, the Group released new recruitment guidelines in 2021 to formalise our approach. These safeguard against bias, and our diversity dashboard monitors outcomes to ensure these are proportionate for different groups.

Our retention rate is high at 89%. 29% of our employees have more than 10 years' service, and 42% joined us over the past three years (see page 171). We believe this provides the right level of continuity and business knowledge, balanced with fresh ideas, skills and experience.

One of the Staff Survey working groups

OUR COMMUNITIES, OCCUPIERS AND OTHER STAKEHOLDERS

We recognise our role in ensuring our buildings are an integral part of the communities they sit within and strive to create value where possible for all our stakeholders.

2021 HIGHLIGHTS

- Maintained our support for local communities
- Reviewed our Community Fund in collaboration with Chickenshed, an inclusive theatre company
- Initiated 3-year Reading Real Estate Foundation bursary
- Founder Member of the Academy of Real Assets

Charities and sponsorships

£105K

2021 Community Fund committed

£850K

Given to c.130 projects since inception

19

Projects supported in 2021

£620K

Additional community and sponsorship donations for 2021

Staff volunteering at The Great British Spring Clean at Paddington

Community Fund

Our Community Fund supports projects which benefit the areas in which we operate. In 2021 we considered applications for core funding as well as grass roots projects in recognition of the impact of the pandemic, with many community groups fighting for survival. The fund supported 19 projects across the portfolio with a mix of existing and new recipients. All selected projects aim to support wellbeing, to improve people's futures and to equip people with skills for life.

Since inception in 2013 our Community Fund has introduced us to many local groups in Fitzrovia and the Tech Belt. This has broadened our perspectives and helped us better understand the issues affecting local people. We are proud of what the fund has achieved to date but need to ensure it remains fit for purpose. To help achieve this we asked Chickenshed's Youth Taskforce to review our processes and to refresh our thinking around 'Community'. We will implement some of the conclusions of this review in 2022.

Focus on the homeless, mental health and D&I

During 2021 our Sponsorships and Donations Committee supported the work of numerous charitable organisations. We continued with the focus on supporting the homeless and mental health by committing over £70,000 to charities working in these two areas. Our support for increased D&I within the property sector, as well as further afield, has resulted in a commitment of over £130,000 in 2021 to organisations seeking to redress the balance, including a 3-year bursary supporting an undergraduate student at the Reading Real Estate Foundation and supporting the establishment of The Academy of Real Assets (see page 62).

Derwent London employees volunteer their time in numerous ways, supporting local education and community work (see page 62). They also support events organised by other partners such as The Paddington Partnership where they collected plastic waste and rubbish polluting the local canal as part of The Great British Spring Clean. In Recycle Week a Derwent London team, together with our waste contractor Paper Round, removed discarded plastic and glass from a stretch of beach along the River Thames.

Working with our occupiers

During the pandemic we have been supporting our occupiers with their evolving space requirements and providing financial support for those most in need. We also work together to support our local communities such as the Writing Partners initiative at The White Chapel Building E1, a literacy programme facilitated by Tower Hamlets Education Business Partnerships now known as The Switch.

Our inaugural online charity auction in aid of Teenage Cancer Trust and Mind was a truly collaborative event involving suppliers and occupiers from across the portfolio. Many of our suppliers and other stakeholders generously donated items for the auction which was open to our occupiers and staff. We were delighted to raise over £13,500 for these two charities.

Our Glasgow office has also been engaging with a number of charities and groups that support the local communities in and around our Scottish portfolio, donating £15,000 to 11 charities in 2021.

RESPONSIBILITY CONTINUED
SOCIAL

Working with local authorities
The Group also supports local authority initiatives. We joined the London Living Wage Foundation in 2017. In 2021, alongside other local stakeholders, we supported Islington in becoming a London Living Wage Borough. As part of Living Wage Week 2021, we hosted an event at White Collar Factory, bringing together some of the Islington businesses that became Living Wage accredited employers during the year.

We recognise the value of working with likeminded businesses and being able to share knowledge and ideas. Being a member of Westminster's Responsible Business Network enables us to meet other local businesses to learn which local groups need support. For instance, along with individual staff donations, we supported Westminster's appeal for funds to provide daily items for refugee families from Afghanistan.

Event at White Collar Factory during Islington Living Wage Week 2021

Supply chain
The Group also encourages its contractors to support local communities around our developments by providing local employment. We are pleased that both The Featherstone Building and Soho Place exceeded their targets in this regard.

Members of Chickenshed and Derwent London staff

LIVING LETTERS, A COLLABORATION WITH CHICKENSHED

Some Derwent London staff were anonymously matched with 16-19 year olds on Chickenshed's BTEC education programme, taking the role of virtual mentors sharing correspondence.

The first letter raised the issues of different perceptions. The second letter focused more on hopes, concerns and aspirations. This programme continues with the hope for face-to-face meetings in 2022.

FOUNDER MEMBER OF THE ACADEMY OF REAL ASSETS

The Academy of Real Assets was established in 2021 to encourage students from less advantaged backgrounds to consider real estate as a workplace and to introduce more diversity and inclusion into the sector; something which Derwent London believes is key for the industry. We hosted the first membership event at DL/78.

Derwent London actively participates in the Academy's activities, such as school talks and career insights which complements our staff volunteering programme engaging with schools and colleges.

We hosted the Academy's first Coffee Broadcast in December, one in a series aimed at informing young students aged 15-19 years old about the property sector. They are being delivered in partnership with Speakers for Schools and cover the whole UK. This was an opportunity for students to see some of the broader opportunities within the industry and to ask the team questions about careers in real estate and sustainability.

HEALTH & SAFETY

Ensuring the health and safety (H&S) of our employees and buildings is fundamental to our business. We strive to deliver great working places and reduce risks.

2021 HIGHLIGHTS

- Introduced a new compliance system
- Created a Benchmarking Group to share H&S data with our property peers
- Enhanced Fire Risk Assessments in line with the future Fire Safety Act
- Focus on working safely at height across our portfolio
- Introduced monthly 'Safety Surgeries'

The 'Derwent Way'

The 'Derwent Way' communicates our inclusive H&S culture and objectives to all our stakeholders.

Our Aim is to provide healthy, safe and secure environments for our people, customers and contractors to work, live, visit and relax.

Our People are fundamental to the success of our business, which is why we invest to ensure healthy and safe work environments.

Enhanced compliance platform

In 2021 the Group migrated the whole portfolio to an enhanced H&S compliance platform in collaboration with internal and external stakeholders. Our current combined commercial and residential property H&S compliance score is 98%. We continue to reinforce our staff and contractors' health and safety culture, assisted by a transparent approach with our supply chain.

The H&S team works with Property Management to ensure that our buildings and projects are operated safely without health risks, including meeting the additional challenges created by the global pandemic.

We consider health, safety and wellbeing at every stage of a building's life cycle: from acquisition, through development, management, leasing and disposal. This requires designing, building, maintaining and operating our buildings using best practices. It also includes specifying the appropriate materials and design to ensure future safe and healthy maintenance and management activities.

Our approach is centred on people, assets and developments.

People

Our staff are updated on H&S matters through regular training. During 2021 new training continued to be rolled out to the Property Management and Development teams. Training included Statutory Compliance, Construction Design and Fire Marshals. The Covid-19 pandemic has mental as well as physical health impacts. In response, a further 14 employees were trained to become Mental Health First Aiders, taking the total to 20.

Employees also attended external H&S courses, such as NEBOSH, IOSH, mental health first aid, water hygiene and tall building fire management. Collectively, 88 training workdays were completed in 2021.

Assets

Ensuring our occupiers, visitors and those who live and work in and around our buildings are safe and healthy is critical. We introduced a new reporting system, RiskWise, in June 2021 which has enhanced our H&S data.

Our Fire Safety Management System continues to evolve in line with BS 9997, meeting the requirements of the new Fire Safety and Building Safety Acts expected to be introduced by the end of 2022.

Every property in our portfolio had a property health check and roof survey. In addition, we reviewed our buildings' physical wellbeing, focusing on lighting, air and water qualities. Where necessary we instigated improvements. This ensures a more holistic approach to enhanced wellbeing as well as risk.

Developments

Our sites continued to follow the Construction Leadership Council's Covid-19 Site Operating Procedures and levels of infections on our sites remained relatively low. This would not have been possible without collaboration with our contractors and supply chain. Together, we have ensured a strong response to mitigate the risks generated by the pandemic.

We continue to raise the significance of health issues on our construction projects, attributing to them the same importance as safety. To help tackle some of these issues, during 2021 we supported the Health and Safety Executive's (HSE) campaigns in mental health, musculoskeletal disorders and respiratory health.

Our H&S data is on page 66 and in the Responsibility Report.

1.26
Accident Frequency Rate

314
H&S inspections

5,842
Inductions

RESPONSIBILITY CONTINUED
GOVERNANCE

At Derwent London, acting in a fair and responsible manner is a core element of our business practice.

2021 HIGHLIGHTS

- Deloitte performed an independent assurance assessment of our green financing arrangements
- Continued mandatory compliance training programme for all employees (including Directors) which covered topics such as social media awareness, data privacy and unconscious bias/respect in the workforce (see page 161)
- HMRC confirmed our 'low-risk' tax rating status until 2022
- Hosted Stakeholder and Investor Days

A responsible business

The oversight of ESG matters is critical. It not only allows the Board to understand more holistically the impact of its decisions on key stakeholders and the environment, but also ensures it is kept aware of any significant changes in the market. This includes the identification of emerging trends and risks, which in turn can be factored into its strategy discussions.

ESG is overseen principally by the Board, Responsible Business Committee and Sustainability Committee (see our ESG governance framework). Our Chief Executive, Paul Williams, has overall accountability for ESG matters however, the responsibility for overseeing its day-to-day management is delegated to Nigel George (Executive Director). Paul Williams oversees the review and performance of our responsibility work as chair of the Sustainability Committee and as a member of the Responsible Business Committee.

ADDITIONAL GOVERNANCE DISCLOSURES

The section 172(1) statement page 124
Whistleblowing page 136
Anti-bribery and corruption page 165
Tax risk page 106
Compliance training page 161

OUR ESG GOVERNANCE FRAMEWORK

The Board
Overall responsibility for ESG matters

Risk Committee
Identifies and evaluates key ESG risks (principal and emerging) ensuring they are appropriately managed
Report page 158

Responsible Business Committee
Monitors the Group's corporate responsibility, sustainability and stakeholder engagement activities
Report page 166

Audit Committee
Monitors assurance and internal financial control arrangements
Report page 148

Remuneration Committee
Ensures ESG factors are included in the executive remuneration framework
Report page 172

Executive Directors with assistance from the Executive Committee
Responsible for overseeing the Group's ESG initiatives

Sustainability Committee
Responsible for implementing the Board's ESG strategy

Health and Safety Committee
Responsible for monitoring health and safety management and performance

Sponsorship and Donations Committee
Responsible for the Group's charitable activities and donations

Social Committee
Aims to encourage teamworking and collaboration between departments through social activities

Climate change governance

The governance of climate change risk and opportunities is ultimately the responsibility of the Board. However, day-to-day management is delegated to the Executive Committee and senior management.

The Board monitors the Group's progress through our science-based targets, which were independently validated and approved by the Science-Based Target initiative (SBTi) in 2019. In addition, performance is externally assured by Deloitte LLP and our 2021 Scope 1, 2 and 3 GHG emissions data, intensity ratio and energy data received 'Public Reasonable Assurance'.

Our strategy and targets for energy consumption and carbon emissions are set and monitored by the Board. The Board, Responsible Business Committee and Executive Committee receive regular updates and presentations on environmental and sustainability performance from the Head of Sustainability.

Climate change governance

Sustainability Committee

Informs the Executive Committee and Responsible Business Committee on climate risk and appropriate management measures taken

Sustainability team

Develops and implements appropriate management measures across the business and identifies climate risk to inform the risk management process

We report under several frameworks to provide a complete picture of our progress and activities and to allow comparison with our peers and other companies (see pages 67 to 75). Our sustainability work has drawn external recognition. We maintain Greenstar status in the Global Real Estate Sustainability Benchmark (GRESB) index with a score of 81, we are listed in the FTSE4Good index and have a CDP rating of C.

SECR disclosure page 74 →
Climate change risk and opportunities page 103 →

Green finance governance

Our Green Finance Framework allows us to clearly link our financing to the environmental benefits our activities generate. The Audit Committee receives annual updates on our green finance initiatives, including in respect to our reporting disclosures.

Our Green Finance Framework received independent assurance from Deloitte LLP that it is aligned with the Loan Market Association's Extended Green Loan Principles and the complete assurance statement is available on our website. Further information on our Green Finance Framework is on pages 13, 96 and 97.

Supply chain governance

It is important to us that our suppliers and construction partners operate ethically and share our ESG business principles.

Our supply chain governance procedures ensure our suppliers are aware of the standards we expect from them and the business practices which we will not tolerate. All suppliers with whom we spend more than £20,000 per annum are required to provide evidence of how they are complying with our Supply Chain Sustainability Standard (the Standard), which sets out our principles and expectations in terms of the environmental, social, ethical and governance issues which relate to our supply chains.

Supply Chain Sustainability Standard page 169 →

During 2021:

- We reviewed best practice in terms of sustainable supply chain management (e.g. BS 8903 and the Ethical Trading Initiative (ETI) Base Code), to understand how we can improve our performance and that of our supply chains.
- We requested evidence that our major suppliers were compliant with the Standard. This involved completion of a questionnaire and providing copies of key policies and procedures (see page 169).
- We published a revised Standard which now includes our expectations in respect of diversity and inclusion, environmental issues, and preventing modern slavery.

Ensuring our payment practices are ethical is a key requirement in governing our supply chain. This was of particular importance due to the Covid-19 pandemic and its impact on businesses.

Responsible payment practices page 169 →

Protecting human rights

The protection of human rights and fundamental freedoms is one of our key ESG priorities which we manage from an internal (within our business) and external perspective (within our supply chain and our relationships with contractors) (see pages 67 and 167).

Based on our ongoing risk assessment, we continue to believe the risk of any slavery or human trafficking in respect of our employees is low. The risk assessment of our supply chain indicated the greatest potential risk existed in the use of building contractors for our development schemes, as their work involves the use of subcontractors. This risk also exists in some of the companies that provide Derwent London with services such as cleaning and security. We ensure all of these suppliers are aware of the Modern Slavery Act 2015 and we require them to formally confirm they are in compliance with the legislation. We monitor and cross-check our supply chain, from procurement to delivery.

Tax governance

We take our obligations as a taxpayer seriously and focus on ensuring that, across the wide range of taxes that we deal with, we have the governance and risk management processes in place to allow us to meet all our continuing tax obligations. The Board has overall responsibility for our tax strategy, risk assessment and tax compliance. Our statement of tax principles, which is approved by the Board, is available on our website.

We have an open and transparent relationship with HMRC and seek to anticipate any tax risks at an early stage, including clarifying areas of uncertainty with HMRC as they become evident. We keep HMRC informed of how our business is structured and respond to all questions or requests promptly. Our Head of Tax also regularly engages with HMRC via his roles with the Chartered Institute of Tax and the British Property Federation to support consultations or to seek legislative clarification in areas that could potentially impact our business.

RESPONSIBILITY CONTINUED
GOVERNANCE

Reporting frameworks and ESG data

Non-financial reporting

As we have fewer than 500 employees, the non-financial reporting requirements contained in the Companies Act 2006 do not apply to us. However, due to our commitment to promoting transparency in our reporting and business practices, we have elected to provide further information in the table below.

	Our key policies and standards	Additional information
Environmental matters	— Responsibility Policy — Net Zero Carbon Pathway — Science-based carbon targets — Task Force on Climate-related Financial Disclosures (TCFD) — Streamlined Energy and Carbon Reporting (SECR) disclosure	— Responsibility Report (**https://rr.derwentlondon.com**) — Our pathway to net zero carbon (see page 12) — Climate change governance (see pages 65, 68 and 69) and risk management (see pages 72 and 102) — Executive Directors' annual bonus (see page 184) — TCFD (see pages 68 to 73) — SECR (see pages 74 and 75)
Social and employee aspects	— Volunteer Policy — Equal Opportunities and Diversity Policy — Professional Development and Training — Shared Parental Leave — Flexible Working Policy	— Community Fund (see page 61) — Our people (see pages 56 to 60) — Diversity and inclusion (see pages 57 to 59 and 169 to 171)
Respect for human rights	— Individual Rights Policy — Health and Safety Policy Statement — Supply Chain Sustainability Standard — Modern Slavery Statement	— Health and safety (see page 63) — Human rights and modern slavery (see pages 65 and 167) — Supply Chain Sustainability Standard (see page 169)
Anti-corruption and bribery issues	— Anti-bribery Policy — Whistleblowing Policy — Expenses Policy — Money Laundering and Terrorist Financing Policy — Preventing Facilitation of Tax Evasion Policy	— Audit Committee report (see pages 148 to 157) — Risk Committee report (see pages 158 to 165) — Our principal risks (see pages 100 to 119) — Compliance training (see page 161)

Health and safety data

The table below details our key health and safety statistics. Our accident frequency rate (AFR) is given for 2021 and for developments only in 2020. This data allows us to identify trends and highlights where we should focus.

	Employees		Managed portfolio		Developments	
	2021	2020	**2021**	2020	**2021**	2020
Person hours worked[1]	**266,960**	n/a	**31,960**	n/a	**1,591,416**	2,204,499
Minor accidents[2]	**0**	1	**9**	10	**42**	46
RIDDORs[2]	**0**	0	**0**	0	**2**	6
Dangerous occurrences[1]	**0**	0	**0**	0	**0**	0
Fatalities[2]	**0**	0	**0**	0	**0**	0
Improvement notices[2]	**0**	0	**0**	0	**0**	0
Prohibition notices[1]	**0**	0	**0**	0	**0**	0
Injury rate[1,3]	**0**	n/a	**0**	n/a	**26.39**	n/a
Lost day rate[1,4]	**n/a**	n/a	**n/a**	n/a	**5.66**	n/a
Severity rate[1,5]	**n/a**	n/a	**n/a**	n/a	**0.13**	n/a
RIDDOR AFR[1,6]	**0**	n/a	**0**	n/a	**1.26**	2.72

Notes:

1 Data has been audited to the reasonable level by Deloitte LLP only in 2021.

2 Data has been audited to the reasonable level by Deloitte LLP in 2021 and 2020.

3 Injury rate - (injuries excluding RIDDOR and lost time injuries)/ (total hours worked)*1,000,000.

4 Lost day rate – (lost time injuries excluding RIDDOR)/ (total hours worked) *1,000,000.

5 Severity rate – total number of lost work days (excluding RIDDORs)/ total number of incidents.

6 RIDDOR accident frequency rate (AFR) – the number of RIDDORs/(total hours worked) *1,000,000.

UN SDG disclosures

The United Nations Sustainable Development Goals (SDG) are an international standard developed to support global change and sustainable growth. We believe that we have a role in supporting the UK in responding to this standard and helping affect change.

We have reviewed the suite of 17 goals and have selected those goals which align most closely to our ESG priorities, which are set out in the table below with a summary of our progress against the goals which are particularly significant to our business.

Our ESG priority	UN Goal	Applicable target	Applicable indicator	Our efforts
Creating value in the community and for our wider stakeholders	4 QUALITY EDUCATION	4.4	4.4.1	Through our Community Fund we invest in and support youth and adult ICT education and skills training – both technical and vocational. A recent example of this is the Shadow Heroes project we have supported. This project uses creative translation workshops as a way to encourage children who have English as an additional language to embrace their linguistic and cultural identities with the aim of bringing about inclusive classrooms, fostering a sense of belonging amongst marginalised language users and to ultimately improve young people's sense of confidence in school and beyond.
		4.a	4.a.1	Through our Community Fund we invest in and support projects which look to upgrade and improve youth education facilities. A recent example of this is the Doorstep Library project which aims to improve literacy skills by providing trained volunteers for families whose children need extra help with their reading. In place of face-to-face sessions, socially distanced book swaps on families' doorsteps have taken place, books have been posted to children as well as one-on-one online reading sessions between families and volunteers. The service gives children the confidence to thrive at home and at school and helps them have a better future through improved literacy skills.
Protecting human rights, Engaging and developing our employees	5 GENDER EQUALITY	5.1	5.1.1	Beyond any legislative requirement we are active in ensuring meaningful gender equality in our business. Whether that is making sure our business structure is representative or making sure our suppliers have the same policies and approaches in their businesses. To help guide us, our Diversity & Inclusion Working Group is tasked with reviewing best practice and to challenge our business to ensure we address equality robustly. In 2021 we achieved the National Equality Standard with our results ranked in the top 5% of accredited companies.
		5.5	5.5.2	32% (33% in 2020) of the women within our business are in managerial roles/positions.
Designing and delivering buildings responsibly, Managing our assets responsibly	7 AFFORDABLE AND CLEAN ENERGY	7.2	7.2.1	Our aim is to ensure we purchase renewable energy for our portfolio. All our electricity contracts which supply our buildings are now REGO backed. As part of our net zero carbon programme we are looking to how we procure renewable gas supplies and incorporate higher levels of on-site renewable energy generation.
		7.3	7.3.1	As part of our science-based targets we have a specific energy intensity target designed to help us reduce our energy intensity. See Responsibility Report for the latest progress on these targets.
Creating value in the community and for our wider stakeholders	11 SUSTAINABLE CITIES AND COMMUNITIES	11.7	11.7.1	We actively promote the inclusion of public spaces in and around our buildings and ensure they are fully accessible to those with disabilities. In addition, we are part of the London Mayor's Business Climate Leaders Group which was set up to help London become a zero carbon city by 2030.
Managing our assets responsibly	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	12.5	12.5.1	We have established a portfolio-wide minimum recycling target of 75% and a no waste to landfill policy.
		12.6	12.6.1	We integrate comprehensive sustainability reporting information into our public reporting.
Designing and delivering buildings responsibly, Managing our assets responsibly	13 CLIMATE ACTION	13.2	13.2.2	We have independently verified science-based carbon targets which are set to a 2°C reduction scenario. This means we are committed to reducing our carbon emissions and making sure our portfolio is climate resilient. We are reviewing these targets to align them with a 1.5°C scenario.

RESPONSIBILITY CONTINUED
GOVERNANCE

The Task Force on Climate-related Financial Disclosures (TCFD)
The Group has used TCFD guidelines as part of its environmental reporting since 2018. Our latest disclosures, on pages 68 to 73, are consistent with the TCFD recommendations and the recommended disclosures. Further information on the TCFD can be found on the Financial Stability Board's website at: **www.fsb-tcfd.org.**

Governance

page 121 →

Describe the Board's oversight of climate-related risks and opportunities

The Board has overall responsibility for climate-related risks and opportunities.

The Responsible Business Committee (RBC), a principal committee of the Board (see report on pages 166 to 171), monitors the management of our climate-related risks and opportunities and meets at least twice a year. One of its roles is to ensure that the Board adequately reflects climate-related issues in its decision making. In turn, the RBC is kept informed by the Executive and Sustainability Committees which are separately responsible for overseeing and implementing climate-related actions and meet monthly and quarterly respectively. Chief Executive, Paul Williams, and Head of Sustainability, John Davies, are members of the Executive and Sustainability Committees and provide regular updates to the RBC and the Board on our climate-related work and the associated risks and opportunities.

During the year, the Board and various committees considered the following climate-related issues:

Responsible Business Committee – the current progress of our net zero carbon programme and targets, most notably the setting of energy reduction targets for our managed properties and our net zero carbon occupier survey.

Risk Committee – the latest position of the Group with regards to the forthcoming Energy Performance Certificate (EPC) changes from 1 April 2023 i.e. the minimum EPC rating of E applying to all operable leases less than 99 years and greater than six months. Likewise, our preparations and financial impacts for the proposed 2030 changes and requirements for the minimum EPC rating to change from E to B – a key transition risk identified in our scenario analysis (see page 161).

Audit Committee – the current progress of our green finance initiatives, including our new £350m green bond, which are funding our latest net zero carbon buildings. In addition, the Committee received training on the assurance we currently undertake on our environmental data which includes energy and carbon and our science-based targets, and where we could expand this assurance in the future to cover other climate-related areas e.g. TCFD.

During the year the Board agreed on the appointment of John Davies to the Executive Committee, strengthening its climate risk expertise and experience at this level.

An overview of the Board's climate-related skills, experience and knowledge is detailed in the chart on page 140.

Day-to-day oversight of climate-related aspects is undertaken by the Sustainability Committee which comprises key department leaders:

- Paul Williams (Chief Executive)
- John Davies (Head of Sustainability)
- Nigel George (Executive Director)
- David Lawler (Company Secretary)
- Richard Baldwin (Director of Development)
- Katy Levine (Head of HR)
- Victoria Steventon (Head of Property Management)
- Vasiliki Arvaniti (Head of Asset Management)

The Sustainability Committee reviews the progress and performance on climate-related issues e.g. energy efficiency, embodied carbon and legislation such as the minimum energy efficiency standards. A target performance and data dashboard (inclusive of climate-related targets/metrics) is produced for discussion and analysis during the Sustainability Committee and related sustainability performance meetings.

To embed a further level of oversight over climate-related issues, we have linked performance measures to the Executive Directors' annual bonus calculations which focus on the improvement of carbon and energy intensity, accounting for 5% and 2.5% respectively of the bonus weighting. See page 184 for further details.

Governance continued

Describe management's role in assessing and managing climate-related risks and opportunities

Our Chief Executive, Paul Williams, has overall accountability for ESG matters which includes climate-related issues. However, the responsibility for overseeing its day-to-day ESG management is delegated to Nigel George (Executive Director). Paul Williams oversees the review and performance as Chair of the Sustainability Committee and as a member of the main Board and Responsible Business Committee. In addition, Nigel George sits on the main Board, Executive and Sustainable Committees. Therefore, he is accountable for climate-related issues which, if significant, are brought directly to the attention of the main Board.

John Davies, Head of Sustainability, has responsibility for developing, leading and, together with his team, implementing the business-wide sustainability programme (inclusive of all climate-related aspects) and reports to Nigel George. As a result, Nigel has a comprehensive oversight of all our climate-related work.

As mentioned above, the Sustainability Committee comprises key department representatives who each have a responsibility for oversight and implementation of climate related issues within their department:

- David Lawler (Company Secretary) – is responsible for ensuring climate-related issues are adequately reflected within our corporate governance structure e.g. our risk management processes
- Richard Baldwin (Director of Development) – is responsible for ensuring our development schemes embed the required climate resilience and net zero carbon aspects within their design and delivery programmes e.g. high EPC and BREEAM ratings
- Victoria Steventon (Head of Property Management) – is responsible for ensuring our properties are operated efficiently e.g. they are reducing their energy consumption in line with our energy targets
- Vasiliki Arvaniti (Head of Asset Management) – is responsible (together with John Davies) for ensuring EPCs are tracked and monitored across the investment portfolio. Likewise, that our asset management plans incorporate the necessary improvement measures and budgets to allow our compliance with the forthcoming EPC legislation changes for 2030 and our net zero carbon commitment

As set out above, there is a clear top down – bottom up 'line of sight' for climate-related aspects from the Board to the Sustainability Committee (see page 64 and our ESG Governance Framework). Target performance and data dashboards (inclusive of climate-related targets/metrics) are discussed and analysed during the Sustainability Committee and related sustainability performance meetings.

See the Risk Management section on page 103 for an outline of how we approach the assessment and management of climate-related risk.

Strategy

page 32 →

Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long-term

We consider short-, medium- and long-term time horizons to be 0-5, 5-15 and 15+ years respectively, recognising that climate-related issues are often (but not exclusively) linked to the medium- to long-term, and our properties have a life of many decades.

Short-term – we have seen a greater shift in terms of legislation, first with the introduction in the UK of the Minimum Energy Efficiency Standards (MEES) for commercial and domestic property and more recently, the proposed 2030 minimum EPC rating changes linked to the acceleration of the government's ambition to achieve net zero carbon by 2050. In addition, customer demand continues to drive the requirement for buildings with robust sustainability credentials, which are cost effective to occupy and promote higher levels of wellbeing and productivity. Our climate scenario analysis showed us that these transition risks are focused primarily on the short-term, with EPC regulation, emissions offsets and cost of raw materials presenting themselves as key risks after applying various mitigation measures from our Net Zero Carbon Pathway. By managing these risks adequately, we believe the following opportunities could include:

- Energy efficient 'green' buildings with better EPCs could be let more quickly, command higher rents and enjoy lower tenant turnover.
- Investing in the overall energy efficiency of our buildings also improves asset value by reducing our maintenance costs and extends a building's life.
- Working closely with tenants to manage building efficiency should lead to closer landlord/tenant relationships.

Medium-term – we have identified the same issues as those that occur in the short-term. We must continually invest in and develop our new and existing properties to ever higher regulatory standards and levels of efficiency to ensure we are able to operate effectively and attract occupiers. This period covers our pathway to becoming a net zero business and it is important that we minimise the amount of residual carbon needed to be offset.

Long-term – we need to invest in our existing portfolio and our development pipeline to ensure they are climate resilient such that our central London buildings remain occupiable. It is possible, depending on what changes actually occur, that climate changes may impact some of our properties which in turn could have a financial impact on our business e.g. increased insurance premiums or loss of rental income. Our scenario analysis showed us that the physical risks are most material in the long-term and present themselves most evidently in the 4°C scenario (aligned with the IPCC's RCP 8.5), with heat stress, flooding and subsidence being the most significant. By following our Net Zero Carbon Pathway and continuing to undertake regular climate risk assessments, we believe we will be in a better position to manage these potential risks. The opportunities that might present themselves include:

- The availability of buildings which become stranded because of physical risk impact could provide us with acquisition opportunities at lower prices.
- Investing in the overall climate resilience of our buildings also improves asset value by reducing our maintenance costs and extends a building's life.

The processes used to determine the climate risks which are material to our business are set out in the Risk Management section on page 103. In addition, see the Principal Risks section on pages 108 to 119 which details our overall risk profile and approach to risk management.

We believe that property portfolios that are able to meet these challenges will remain attractive to occupiers and investors and in good demand. This trend presents opportunities for the Group (see page 10).

RESPONSIBILITY CONTINUED
GOVERNANCE

Strategy continued

Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	As a central London focused real estate investment trust (REIT), we invest in, develop, and manage property in central London and, as such, climate-related issues affect the way we develop new buildings, refurbish and manage our existing portfolio and engage with our occupiers. This in turn affects the kinds of suppliers and consultants we use in these activities to ensure we have the requisite level of expertise. As described on page 6, this is driven by an ever-increasing demand from our occupiers and other stakeholders wanting buildings with higher levels of sustainability credentials, as well as the regulatory landscape becoming tougher and more demanding. The recognition that climate change has a material impact on our business and our stakeholders led us to develop our Net Zero Carbon Pathway to become a net zero carbon business by 2030 (aligned to a 1.5°C climate scenario). Our pathway covers the breadth of our business activities to ensure we are reducing our carbon footprint and exposure to risk, examples include: Financial planning (operating costs, capital expenditure and allocation) – to ensure we are capturing the cost of carbon appropriately we are developing our approach to carbon accounting such that we are including the cost of carbon in our financial appraisals and forecasting, so we understand and capture the cost of carbon in our new schemes and business activities. In addition, we are undertaking specific reviews to help us understand the cost of certain transition risks. During 2021 we commissioned a report to understand the actions and costs required to ensure our portfolio would remain compliant with the proposed changes to the minimum EPC ratings required from 2030 – see page 55 for further details. Access to capital – we believe in the future it will be harder to access good quality, affordable finance without being able to demonstrate how we are addressing and effectively managing climate risk. In response, our Green Finance Framework has been specifically developed to allow us to link our finances to our net zero ambitions by setting out performance criteria and a governance framework which enable us to clearly show the link between the use of our debt facilities to our development and refurbishment activities. To date we have two specific facilities which are linked to our framework – the £300m 'green' element of our main corporate £450m revolving credit facility and a £350m green bond issued in 2021. These are helping to fund our latest eligible projects – see pages 22 to 25 for further details. Acquisitions and divestments – our business model is based on acquiring older buildings and improving them to add value. Prior to a new purchase we now undertake carbon appraisals to establish the incumbent carbon liability allowing a more holistic understanding of cost. In addition, we also establish the EPC related risk and, if the rating is low, what actions and cost will be required to improve it. We have disposed some assets where the estimated additional costs associated with the transition to better energy performance influenced our decision. Developments – our Responsible Development Framework and Net Zero Carbon Pathway ensure we set the right design brief for our development pipeline. These ensure that the properties are more climate resilient such as building them for a longer life, to be more flexible to occupy and operate, less reliant on mechanical cooling and free from fossil fuel use i.e. all electric heating and cooling. Managing assets – our Responsible Framework for Assets and Net Zero Carbon Pathway ensure we have plans and targets in place for each managed asset which set out how we will reduce energy consumption/carbon emissions effectively to meet our overarching targets.

Strategy continued

Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario

Our properties are subject to climate-related risks, such as increasing temperatures, which could lead to greater physical stresses and, in turn, increase our costs e.g. management and utility costs.

Our business model involves both investing in new developments and acquiring older properties which hold future regeneration potential. We ensure a high degree of resilience in our new developments and regeneration of older properties by setting high standards for sustainability, which includes climate-related aspects. When managing our core income portfolio, we have a significant focus on energy and carbon reduction, ensuring our buildings operate as efficiently as possible. As a result, our strategy centres around the concept of continual improvement which ensures a high degree of both climate and financial resilience. Ultimately, we do not envisage having to make changes to our approach when considering climate-related scenarios.

We recognise that climate change does have an impact on our business and part of our strategic response has been the commitment to becoming a net zero carbon business by 2030 such that we can transparently address the transitional and physical risks and opportunities which apply to our business. This is in addition to our existing science-based target, which is already aligned to a 2°C scenario.

In 2020 Willis Towers Watson provided a detailed analysis of the Group's climate-related risks, set across different climate scenarios – a 2°C scenario for transition risk (aligned with IPCC's RCP 2.6) and a 2°C and 4°C scenario for physical risk (aligned with the IPCC's RCP 8.5). Set out below is a summary of their findings:

Transition risk

Policy & legal
- Pricing of GHG emissions
- Energy Performance Certificate rating requirements
- Emissions offsets
- Planning approval changes
- Climate change litigation
- Enhanced emissions reporting obligations

Market
- Change in customer demands
- Cost of debt
- Increased cost of raw materials

Reputation
- Investment risk

Physical risk

The physical risk assessment was undertaken through two plausible climate scenarios – IPCC RCP 2.6 and 8.5, within which the analysis focused on three time horizons:

1. Current climate (2020 to 2030)

2. Medium-term climate change impact (2050)

3. Longer-term impact (2080 to end of century) where models were available for key perils and where a clear climate change signal warranted modelling of the time horizon or scenario

The assessment also included a review of current climate exposures, climate change implications for those exposures, indicative loss modelling and analysis and forecasts of the likely electricity and gas usage for selected properties. The physical risks were identified across two types:

Chronic
- Heat stress
- Subsidence
- Coastal flooding and sea level rise

Acute
- Flooding
- Storms
- Infrastructure

As part of our approach to managing both transition and physical risks, we are committed to becoming a net zero carbon business by 2030. Our Net Zero Carbon Pathway sets out a clear plan on how we will transition towards this by:

- Reducing the energy consumption and improving the efficiency of our assets
- Increasing renewable energy procurement e.g. green gas procurement, self-generated energy managing the future risk of higher energy costs
- Adopting carbon accounting to enable us to anticipate the future cost of carbon so we can inform our decision-making
- Reducing the embodied carbon associated with our development schemes
- Carbon offsetting via verified removal schemes for those emissions we cannot eliminate

These commitments, coupled with our Responsible Development Framework and Sustainable Framework for Assets and net zero action plans for individual assets, support the business in addressing and managing the above risks and enabling it to move towards net zero carbon.

RESPONSIBILITY CONTINUED
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Risk management

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Describe the organisation's processes for identifying and assessing climate-related risks. Describe the organisation's processes for managing climate-related risks. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management. (As all recommended disclosures are heavily interrelated we have opted to combine our disclosure)

The responsibility for managing our corporate risk lies with the Executive Committee, Board and Risk Committee. Each year the Executive Committee collate and assess the key risks, which include sustainability/climate change related risks. This assessment seeks to understand risk severity and likelihood as well as the optimal controls and/or mitigation actions required. This approach allows the effects of any mitigating procedures to be considered properly, recognising that risk cannot be eliminated in every circumstance. The risk register is then put forward to the Board and Risk Committee for consideration, review and ultimately adoption. Climate-related risks and opportunities are also highlighted and discussed by the Responsible Business and Sustainability Committees where appropriate. These risks can include transition risk (e.g. regulatory risk and reputational risk) and physical environmental risk.

To assess the materiality of climate-related risk we worked with Willis Towers Watson in 2020 to specifically explore climate risk and opportunity. This followed a structured identification and assessment of the transition and physical risks applicable to our business across two climate scenarios, namely 2°C and 4°C scenarios aligned with the IPCC's RCP 2.6 and 8.5 pathways respectively.

As part of the scenario analysis, the transition risks identified within the 2°C scenario estimated the financial materiality for each risk using a structured template to capture any impacts to the profit and loss (revenue and expenditures) and impacts to the balance sheet (assets and liabilities and capital/financing). High and low impact estimates were given to applicable cost components depending on the success of planned mitigating actions, and risks given a 1 to 5 impact rating according to a defined rating criterion. Working through the assessment process and applying mitigation measures already captured within the scope of our Net Zero Carbon Pathway and those within our existing business processes, demonstrated that few of these risks had a residual impact. Those which remained were:

Energy Performance Certificate rating requirements
When we undertook the assessment, tougher minimum energy performance certificate standards were indicated by the Government. These have now been confirmed and will be phased in during the period up to 2030. It was assessed that complying with the new measures would result in significant additional investment across our portfolio. To address this, in 2021 we commissioned a report to review the actions and costs required to meet these new standards – see pages 52 to 55 for further details.

Cost of raw materials
Climate change could affect the input costs of traditional development related materials or building services e.g. energy and water. Utilising more innovative low carbon materials could allow us to mitigate some of the potential impacts this risk might pose. To monitor the effects of this on our business, we track the construction costs (of which material costs are a part) and inflationary impacts on those costs to understand the impact on our business. See the Chief Executive statement for further detail (see page 10).

Emissions offsets
The cost of high-quality carbon offsetting is likely to continue to rise due to supply constraints. However, the energy/carbon reduction initiatives and investment in our portfolio should enable us to reduce our reliance on offsetting and exposure to significant cost movements. We publish details of our annual offsetting practices, (see page 54). Where we purchase any new offsets, we will state the costs together with any applicable inflationary commentary.

The physical risks assessed within the 2°C scenario highlighted:

Storms
Many of our buildings could be exposed to windstorm damage especially during the winter season. This was the most significant risk in this scenario and means we need to ensure we have the right features in place to protect our building façades.

Heat stress
Whilst within this climate scenario, and coupled with our management approach, this is not a high risk to our business, we remain vigilant to any increase in temperature and the effect it could have e.g. increased cooling demands and subsequent increases in energy consumption.

Subsidence
Although not a significant risk to our business in this scenario, temperature increases in different climate scenarios, coupled with increased rainfall or flooding, could affect some of our older properties.

Within the 4°C scenario the risks assessed highlighted:

Heat stress
Hotter summers (10-20 days of heatwave pa in London) will impact our business, by increasing cooling demands and thereby increasing energy consumption and maintenance costs for our buildings.

Flooding
In this climate scenario, flood defences such as the Thames Barrier could be placed under increased stress which could lead to failures, albeit this would possibly only affect four of our properties. In addition, flash flood risk could increase.

Subsidence/critical infrastructure
In this climate scenario, instances of subsidence and critical infrastructure disruption are more probable.

Metrics and targets

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Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	To enable our stakeholders to understand our climate-related impact and subsequent performance, the data section of our Responsibility Report (**https://rr.derwentlondon.com**) includes an extensive range of consumption and intensity metrics for energy, carbon, waste and water, and reflect those highlighted in the buildings and materials groups, namely: — Total energy consumed, broken down by source (e.g. purchased electricity and renewable sources) — Total fuel consumed percentage from coal, natural gas, oil, and renewable sources — Building energy intensity (by square area) — Building water intensity (by square area) — GHG emissions intensity from buildings (square area) and from new construction and redevelopment — For each property type, the percentage certified as sustainable All the above metrics are presented in the data section of our latest Responsibility Report with at least the previous year's data to allow for comparison. In addition, our previous reports are available on our website which contain several years' worth of data, allowing for historical trend analysis. As identified in our materiality review, resource efficiency (which includes energy efficiency, greenhouse gases, climate change and water) is a material issue for our business and, as such, is classified as a principal risk (see page 116). Further to this, performance against our science-based carbon targets form a part of our Executive Directors' remuneration – details of which can be found on page 184. In addition to the above metrics, we also use our science-based carbon targets and a specific scenario analysis tool to support us in the strategic planning of our portfolio and undertake future projections of carbon intensity reduction set against recognised 2°C transition scenarios, namely the IEA ETP 2DS and the nationally determined UK climate change commitments modelling trajectory.
Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	We publish a detailed data report which sets out our environmental data performance. This includes extensive carbon reporting across all scopes: Scopes 1, 2 and 3 using the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard. Likewise, we provide trend analysis across several years to show progress and historical performance. Refer to the data section of our latest Responsibility Report for our carbon reporting which also includes full details of the aggregation and calculation methodology. Moreover, we publish a summary of our corporate carbon footprint on page 74.
Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets	Following our review of the Paris International Climate Change Agreement in 2016, we developed a set of science-based carbon targets to ensure we align our carbon reduction programme to its objectives, as well as minimising our risk exposure to climate change on our managed portfolio. These were verified by the Science-Based Target initiative (SBTi) in 2019 and are: "We commit to reduce Scope 1 and 2 GHG emissions 55% per square metre by 2027 from a 2013 base year. Derwent London also commits to reduce Scope 3 GHG emissions 20% per square metre by 2027 from a 2017 base year." As part of our revised net zero ambition, we will be reviewing these targets to align them with a 1.5°C climate warming scenario and we will provide further updates when this is complete. To see the latest progress against these targets refer to the science-based carbon target performance section of our latest Responsibility Report.

RESPONSIBILITY CONTINUED
GOVERNANCE

Streamlined Energy and Carbon Reporting (SECR) disclosure

In line with the SECR regulations, we present below our disclosure which is comprised of our carbon emissions across Scopes 1 and 2 together with an appropriate intensity ratio – tCO_2e/m^2. We also set out our Scope 3 emissions and global energy use (kWh) used to calculate our emissions.

New for this year, we have expanded our reporting to provide a more detailed perspective on our carbon emissions, likewise the emissions and energy which we are not directly responsible for but derive from our buildings i.e. the energy consumption of our occupiers and the associated emissions.

GHG and energy data

Scope 1 and 2 emissions[1]

		tCO_2e 2021	tCO_2e 2020	Difference
Scope 1 (combustion of fuel) Managed portfolio gas use and fuel use in Derwent London owned vehicles	Location-based	3,173	3,326	-5%
Emissions associated with certified green gas use	Market-based	2,428	3,291	-26%
Scope 1 (operation of facilities) Managed portfolio refrigerant loss from air conditioning systems		–	–	
Scope 2 (purchased electricity, heat, steam and cooling for our own use) Managed portfolio electricity use for common parts and shared services (landlord-controlled areas) - no heat, steam or cooling was/is purchased	Location-based	1,678	1,947	-14%
Emissions associated with renewable REGO backed electricity use	Market-based	63	0	
Total Scope 1 and 2 emissions	Location-based	4,852	5,273	-8%
	Market-based	2,491	3,291	-24%
Carbon intensity ratio (tCO_2e/m^2) Derived from total Scope 1 and 2 emissions	Location-based	0.013	0.015	
Proportion of Scope 1 and 2 emissions assured by an independent third party (see data notes table below)		100%	100%	

[1] Numbers may not sum due to rounding

Scope 3 emissions[1]

Category	Notes	tCO_2e 2021	tCO_2e 2020	Difference
Purchased goods and services	N/A			
Capital goods	See note below on emissions outside of current scope			
Fuel and energy related activities		3,063	2,118	45%
Upstream transportation & distribution	N/A			
Waste management		25	25	-1%
Business travel		6	14	
Employee commuting	Measured but deemed to be de minimus	<5%	<5%	–
Upstream leased assets	N/A			
Downstream transportation & distribution	N/A			
Processing of sold products	N/A			
Use of sold products	N/A			
End-of-life treatment of sold products	N/A			
Downstream leased assets	Emissions from tenant electricity consumption	5,099	5,555	-8%
Franchises	N/A			
Investments	N/A			
Water		16	37	
Total Scope 3 emissions		8,208	7,749	6%
Proportion of Scope 3 emissions assured by an independent third party (see data notes table)		100%	100%	

Outside of current Scope 3 emissions

Category	Notes	tCO_2e 2021	tCO_2e 2020	Difference
Capital goods	Embodied carbon from major developments and refurbishments	1,036	19,790	-95%

Energy efficiency actions

During 2021 we saw an increase in the re-occupation of our buildings as the Covid-19 lockdown measures were eased and our occupiers returned to their workplaces. Throughout this time, we were and still are operating a range of Covid-19 based safety measures to maintain a safe working environment for our occupiers. As a result, we saw energy consumption levels start to return to levels more consistent with fully occupied buildings and not the significant reductions seen in 2020 at the start of the pandemic. However, this has not stopped us implementing a range of energy efficiency measures like installing energy efficient air handling unit filters and optimising plant and building management schedules and, where possible, aligning them with the re-occupation plans of our occupiers.

By doing this, we were able to rationalise the increased energy demand from our occupiers and balance the required Covid-19 ventilation safety measures.

We measure the embodied carbon footprint of all our development schemes which would be relevant for inclusion in the capital goods category. However, there are as yet no agreed property-specific accounting principles in place to capture the footprint of these emissions appropriately, which avoid the under or over inflation of the Scope 3 figures on an annual basis.

	kWh		
	2021	2020	Difference
Gas (combusted on a whole building basis)	**17,288,719**	18,069,846	-4%
Electricity (consumption from landlord-controlled areas)	**7,953,114**	8,398,662	-5%
Electricity (consumption from tenant-controlled areas)	**24,016,115**	22,315,697	8%
Total energy (consumption from landlord-controlled areas for electricity and gas)	**25,241,833**	26,468,508	-5%
Total building energy (consumption from landlord and tenant-controlled areas for electricity and gas)	**49,257,948**	48,784,205	1%

Data notes	
Reporting period	1 January to 31 December 2021.
Boundary (consolidation approach)	We use an operational control boundary approach based on our corporate activities and managed central London (UK) property portfolio.
Alignment with financial reporting	The only variation is that our GHG emissions/energy data presented does not account for single-let properties or properties for which we do not have management control. This is because we have no control or influence over the utility consumption in these buildings. However, the rental income of these properties is included in our consolidated financial statements.
Reporting method	We arrange our GHG emissions reporting in line with the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard. For further details on our data calculation methodology visit the data section of our latest Responsibility Report.
Emissions factor source	DEFRA, 2021 - **https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting** for all emissions factors apart from the Scope 2 market based factors which are based on the provenance of our electricity and some gas supplies which are from renewable/green sources.
Independent assurance	Public reasonable assurance (using ISAE 3000) is provided by Deloitte LLP over all Scope 1, 2 and 3 GHG emissions data, intensity ratio and energy data. Our assurance statement can be found in our latest Responsibility Report.

For more analysis of our GHG emissions, energy consumption and renewable energy generation, use and procurement visit the data section of our latest Responsibility Report.

ESG FOCUS AREAS FOR 2022

ENVIRONMENTAL

- Progress asset specific net zero carbon (NZC) action plans
- Start to implement findings from NZC occupier survey
- Continue to progress realigning science-based targets in accordance with emerging guidance
- Continue to develop our approach to carbon accounting
- Increase our waste recycling rate

SOCIAL

People

- Further embed D&I into the business
- Continue health and wellbeing initiatives with a focus on mental health and work-life balance
- Deliver our third all-employee awayday

Community

- Continue our Community Fund in its 10th year
- Participate in #10000BlackInterns programme
- Develop an approach to measuring our social impact

Health and Safety

- Additional focus on both physical and mental health across our activities
- Broaden the use of RiskWise to assist construction and design, as well as contractor, water and environmental management
- Maintain our overall H&S compliance platform score at a minimum of 95%

GOVERNANCE

- Publish our 2022 Modern Slavery Statement and agree focus areas to further strengthen our processes
- Engage with our major shareholders in respect to our 2023 Remuneration Policy
- Review the final recommendations arising from the BEIS consultation on audit reform and agree a timetable for implementation
- Continue our mandatory compliance programme