

## CORPORATE GOVERNANCE STATEMENT CONTINUED

### Workforce policies and practices

The Executive Directors, with assistance from members of the Executive Committee, review and approve all key policies and practices which could impact on our workforce or influence their behaviours to ensure they support the Group's purpose and reflect our values (see page 131).

Policies are published on the intranet and where relevant included in the employee handbook. Our employees are required to confirm their understanding of these policies upon recruitment and on an annual basis.

To ensure policies are embedded in our business practices, we hold presentations to staff which highlight the key messages and notify them of any changes. We operate a mandatory training programme which aims to reinforce key compliance messages in areas such as anti-bribery, modern slavery, conflicts of interest, etc.

### [Compliance training page 161](#) →

All employees (including the Board) are required to notify the Company as soon as they become aware of a situation that could give rise to a conflict or potential conflict of interest. The register of potential conflicts of interest is regularly reviewed to ensure it remains up to date. The Board is satisfied that potential conflicts have been effectively managed throughout the year (see page 139).

The Board approve the Remuneration Policy for the Executive Directors and, via the Remuneration Committee, has oversight of the wider workforce remuneration practices (further information on page 176). Our remuneration policies and practices are aligned with our pay principles, described on page 175.

As a business, we seek to conduct ourselves with honesty and integrity and believe that it is our duty to take appropriate measures to identify and remedy any malpractice within or affecting the Company. Our employees embrace our high standards of conduct and are encouraged to speak out if they witness any wrongdoing which falls short of those standards.

Our whistleblowing procedures are included within our employee handbook, on our Group intranet and staff noticeboards. In addition to an independent telephone line and online portal for anonymous reporting of concerns, the Senior Independent Director acts as an independent point of contact for whistleblowing concerns. Following receipt of a whistleblowing message we have procedures in place to ensure an independent and proportionate investigation. Any significant issue relating to potential fraud is escalated to the Chair of the Audit Committee immediately. In addition, Dame Cilla Snowball (Chair of the Responsible Business Committee and designated Director for gathering the views of the workforce) will be advised of any significant concerns raised by our employees.

During 2021, the Group migrated to a new whistleblowing system provider. The new arrangements were rolled out to all employees, including the building management teams. In the 2021 employee survey, 84% of employees confirmed they would feel able to speak up if they witnessed or experienced behaviour which was not consistent with our culture/policies.

Although this is an encouraging figure, we aspire for this to be 100%. We have therefore set 'wrongdoing and the reporting of concerns' as the topic for Q1 2022 under our compulsory compliance training programme.

The Board receives updates from the Company Secretary on the operation of the whistleblowing system. During the year under review, we did not receive any messages via our whistleblowing system (2020: no messages). Due to the 'open door' nature of our business, concerns are often raised directly with management, the CEO or HR team, and appropriately investigated.

### Stakeholder impact analysis

The Board's procedures require a stakeholder impact analysis to be completed for all material decisions requiring its approval that could impact on one or more of our stakeholder groups. The stakeholder impact analysis assists the Directors in performing their duties under s172 of the Companies Act 2006 and provides the Board with assurance that the potential impacts on our stakeholders are being carefully considered by management when developing plans for Board approval.

The stakeholder impact analysis identifies:

- potential benefits and areas of concern for each stakeholder group;
- the procedures and plans being implemented to mitigate against any areas of concern; and
- who is responsible for ensuring the mitigation plans are being effectively implemented.

Board decisions which are likely to have the greatest impact on our stakeholders are those relating to our development projects particularly in respect to demolitions and rebuilds. These projects can cause:

- traffic disruption;
- noise and dust;
- vibrations; and
- impact on the surrounding area, communities and businesses.

To mitigate these issues, we enrol our development projects in the Considerate Constructors Scheme, conduct detailed traffic management risk assessments, noise and dust monitoring, and work in accordance with the relevant local authorities' Construction Management Plan. The construction methods to be used are modelled in software in order to calculate noise levels and if the model exceeds trigger levels, adjustments are made until the required noise levels are met.

At all times, work on our development sites is carried out in a safe and considerate manner with due regard to the public, adjoining properties, businesses, and road users. We maintain regular contact with local communities via various channels including, community engagement forums, newsletters, letters, public exhibitions and consultations. We disclosed on pages 117 and 107 of the 2020 and 2019 Report & Accounts, the outcome of stakeholder impact analyses performed for the 19-35 Baker Street W1 and Soho Place W1 projects, respectively.