

GRI Compliance



We have benchmarked our reporting against the updated Global Reporting Initiative sustainability reporting guidelines [GRI: G3]. We assess our application of the GRI reporting framework to be at level B.

GRI Profile Disclosures		
	Contents Checklist	Description
1 Strategy & Analysis		
1.1	Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy.	CR online report Chief Executive statement CR online report Head of Sustainability's statement Annual Report Chairman's statement pg 4
1.2	Description of key impacts, risks and opportunities	CR online report Chief Executive statement CR online report Legislation section
2 Organisational Profile		
2.1	Name of the organisation	Front cover of Annual Report, CR summary report homepage of online report
2.2	Primary brands, products, and/or services.	Who we are statement - inside cover of Annual Report; CR summary report; homepage of online report Annual Report and Accounts - p3
2.3	Operational structure of the organisation, including main divisions, operating countries, subsidiaries, and joint ventures.	Annual Report inside cover; pg 3; pg 109; pg 113 -125
2.4	Location of organisation's headquarters.	Annual Report pg 112
2.5	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Annual Report inside front cover; pg 3 Completeness section of the GRI
2.6	Nature of ownership and legal form	Annual Report pg 84, 109 Corporate website About Us section
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Performance Indicators pg 1 Annual Report pg 3, 16 Corporate website occupiers' section Connected Reporting Framework
2.8	Scale of the reporting organisation, including - Number of employees; - Net sales (for private sector organisations) or net revenues (for public sector); - Total capitalization broken down in terms of debt and equity - Quantity of products or services provided	Performance Indicators pg 16 Annual Report pg 1
2.9	Significant changes during the reporting period regarding size, structure, or ownership including: - The location of, or changes in operations, including facility openings, closings, and expansions; and - Changes in the share capital structure and other capital formaiton, maintenance, and alteration operations	Annual Report and Accounts pg 2 Completeness section of the GRI
2.10	Awards received in the reporting period	Corporate website Awards list

	Contents Checklist	Description
	3 Report Parameters	
3.1	Reporting period for information provided	The report covers the calendar year ending 31 December 2009
3.2	Date of most recent previous report	The previous report was published in March 2009, covering the calendar year ending 31 December 2008
3.3	Reporting cycle	Annually in line with Annual Report and Accounts
3.4	Contact point for questions regarding the report or its contents.	Contact us
3.5	Process for defining report content, including: - Determining materiality; - Prioritizing topics within the report, and - Identifying stakeholders the organisation expects to use the report.	Material issues and stakeholders Compliance with GRI guidelines
3.6	Boundary of the report (e.g. countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).	Compliance with GRI guidelines
3.7	State any specific limitations on the scope or boundary of the report.	Compliance with GRI guidelines
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations.	Compliance with GRI guidelines
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	Environmental and financial methodological statements, Performance Indicators pg 1-5
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	Performance Indicators pg 4
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Compliance with GRI guidelines Performance Indicators pg 1-5
3.12	Table identifying the location of the Standard Disclosures in the report.	Compliance with GRI guidelines
3.13	Policy and current practice with regard to seeking external assurance for the report.	CR online report: Upstream Sustainability Services Advisors' Statement Bureau Veritas Data Review Statements

	Contents Checklist	Description
	4 Governance, Commitments, and Engagement	
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	Annual Report, Corporate Responsibility pg 42; Corporate Governance pg 48 - 51
4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement).	Annual Report pg 49
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	Annual Report pg 7, 49
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Annual Report pg 48,49
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance)	Annual Report Reuneration Report pg 56 - 63; CR online report: Knowledge & Reporting section
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Annual Report Corporate Governance pg 48 - 51
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	Annual Report Corporate Governance pg 49
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	<p>Publicly available on our website</p> <ul style="list-style-type: none"> - an Environmental Policy - in full implementation - a Responsible Procurement Policy - in the process of being implemented - an Equal Opportunities Policy - in full implementation - a Climate Change and Carbon Management Policy - in full implementation - extracts from our Code of Conduct- in full implementation <p>Internally</p> <ul style="list-style-type: none"> - Corporate Control Manual - in full implementation - Whistleblowing procedures - in full implementation - Staff Handbook - in full implementation
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, code of conduct, and principles.	Annual Report Corporate Governance pg 48
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Annual Report Corporate Governance pg 48
4.11	Explanation of whether and how the precautionary approach or principles is addressed by the organization.	The precautionary approach is addressed by the organisation through the use of Sustainability Implementation Plans for developments, Environmental Management Systems for our managed assets (some of which are certified to ISO 14001) and the climate change mitigation and adaptation actions that we carried out in 2009.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Annual Report pg 22; CR online report: Community Regeneration section
4.13	Membership in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: <ul style="list-style-type: none"> - has positions in governance bodies; - participates in projects or committees; - provides substantive funding beyond routine membership dues; or - Views membership as strategic. 	CR online report: Community Regeneration section; stakeholder engagement table Annual report pg 22-23
4.14	List of stakeholder groups engaged by the organisation	CR online report: Material issues and stakeholders
4.15	Basis for identification and selection of stakeholders with whom to engage	CR online report: Material issues and stakeholders
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	CR online report: Stakeholder engagement table
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	CR online report: Stakeholder engagement table

GRI Summary of Management Disclosures

We have incorporated all GRI Disclosures on our Management Approach throughout our CR report as well as in our website and Annual Report and Accounts. Organisational responsibility refers to the member of senior management with direct responsibility for the specified area, and the Board director with ultimate responsibility.

Economic Management Disclosures

Economic performance	Annual Report and Accounts Financial Highlights pg 1, Chairman's Statement pg 4, Risk Management pg 20; Key Performance Indicators pg 22
Market Presence	Annual Report and Accounts P3
Indirect Economic Impacts	* Community Performance Indicators * Community section of the Connected Reporting Framework
Goals and Performance	*Community Regeneration and Supply Chain sections of CR Report *Community Performance Indicators * Financial indicators under our Connected Reporting Framework
Policies	* Annual Report and Accounts pg 22-24; Treasury strategy available at: http://www.hammerson.com/phoenix.zhtml?c=133289&p=irol-debt-treasury-strategy * See our community objectives for 2010, including the development of a Community Strategy, Community Framework and Community Charter for all new developments

Environmental Management Disclosures

Materials	
Energy	*Climate Change and Energy section
Waste	*Resource Use section
Biodiversity	*Biodiversity case study
Emissions, Effluents and Waste	*Annual Report Corporate Governance section pg 48-51
Products and Services	* Procurement Policy http://www.hammerson.com/phoenix.zhtml?c=133289&p=resp-policies-procurement
Compliance	
Transport	
Goals and Performance	*Assessment of progress against our 2009 Climate Change and Energy targets by Upstream Sustainability Services *Climate Change and Energy and Resource Use performance indicators *Climate Change and Energy and Resource Use 2010 targets
Policies	*Environmental Policy *Climate Change and Carbon Management Policy
Organisational Responsibility	Paul Edwards, Head of Sustainability; David Atkins, Chief Executive
Training and Awareness	*Training and development section *Climate Change and Energy section *Achievement of our 2009 Knowledge and Reporting targets
Monitoring and Follow-up	* ISO 14001 certification at some of our assets (cf Annual Report pg 113- 125 for portfolio ratings) * Resource Use and Supply Chain Performance Indicators * Assessment of progress against our 2009 Resource Use and Supply Chain targets by Upstream Sustainability Services

Labour Practice Management Disclosures

Employment	
Labour/Management Relations	
Occupational Health and Safety	
Training and Education	
Diversity and Equal Opportunity	Our reporting has significantly extended in this area in 2009 and includes an Employee section under our Annual Report and Accounts pg 38-39 as well as Performance Indicators related to Employees under the Knowledge and Reporting section and a Training and Development section of the online CR report.
Goals and Performance	*Knowledge and reporting indicators *Assessment of progress against our 2009 Knowledge and Reporting targets by Upstream Sustainability Services *2010 Knowledge and Reporting targets
Policies	Equal Opportunities Policy (available at http://www.hammerson.com/phoenix.zhtml?c=133289&p=resp-policies-equal-opportunities)
Organisational Responsibility	Sally Learoyd, Director Human Resources; David Atkins, Chief Executive
Training and Awareness	Induction to all staff as stated in our Knowledge and Reporting - Employee indicators Training and development section
Monitoring and Follow-up	Great Place to Work survey introduced in France and the UK in 2009 Supply Chain questionnaire gradually introduced across our UK and French operations for development and managed assets

Society Management Disclosures	
Community	
Corruption	
Public Policy	
Anti Competitive Behaviour	*Community Regeneration section of our CR Report
	*Legislation section of our CR report
	*Code of Conduct (internal document, a summary of which is available at http://www.hammerson.com/phoenix.zhtml?c=133289&p=governance#top)
Compliance	*Annual Report and Accounts Corporate Governance section, Internal control pg 51
	*Assessment of progress against our 2009 Community and Knowledge and Reporting targets by Upstream Sustainability Services
Goals and Performance	*2010 Community and Knowledge and Reporting targets * Annual Report and Accounts, Corporate Governance section, p 48
	Publicly available *extracts from our Code of Conduct- in full implementation
	Internally *Corporate Control Manual - in full implementation *Whistleblowing procedures - in full implementation *Staff Handbook - in full implementation
Policies	
	Internal Control: Warren Austin, Group Financial Controller; Simon Melliss, Group Finance Director
Organisational Responsibility	Community: Paul Edwards, Head of Sustainability; David Atkins, Chief Executive
Training and Awareness	Annual Report and Accounts Human Resources section pg 38-39
Monitoring and Follow-up	Annual Report and Accounts Corporate Governance section pg 51
Product Responsibility Disclosures	
Customer Health and Safety	*Training and development section
Product and Service Labeling	*Customers section
Marketing Communications	*We have included environmental ratings in our Property Portfolio section of the Annual Report pg 113-125
Customer Privacy	
	*Marketing communications and customer privacy are not considered to be material to the product of a building.
Compliance	
	*Assessment of progress against our 2009 Customers targets by Upstream Sustainability Services
	*Customers health and safety indicators
	*Resource Use indicators including BREEAM and HQE achievements on new developments
Goals and Performance	*2010 Customers targets * Hammerson Design Standard
Policies	Internal Health and Safety Policy
	*Health and Safety: Andrew Thomson, Director of Operations, David Atkins, Chief Executive
Organisational Responsibility	*Customers: Lawrence Hutchings, Managing Director, UK Retail
Training and Awareness	Knowledge and Reporting indicators Customers indicators
Monitoring and Follow-up	Customers indicators
Human Rights Management Disclosures	
Investment and Procurement Practices	
Non- discrimination	
Freedom of Association and Collective Bargaining	
	Although we do not consider Human Rights to be one of our core Material impacts due to the nature and location of our operations in France and in the UK, we have now incorporated Human Rights criteria into our UK sustainability questionnaire for suppliers, as well as in to our Human Resources policies and procedures where applicable.
Complaints and Grievance Practices	
Goals and Performance	*Assessment of progress against our 2009 Knowledge and Reporting - Employees targets by Upstream Sustainability Services
	*Equal Opportunities Policy (available at: http://www.hammerson.com/phoenix.zhtml?c=133289&p=resp-policies-equal-opportunities)
	*Responsible Procurement Policy (available at: http://www.hammerson.com/phoenix.zhtml?c=133289&p=resp-policies-environmental)
	*Climate Change and Carbon Management Policy (available at: http://www.hammerson.com/phoenix.zhtml?c=133289&p=resp-policies-climate-change)
	*Extracts from our Code of Conduct (available at: http://www.hammerson.com/phoenix.zhtml?c=133289&p=governance)
Policies	
	*Employees: Sally Learoyd, Director Human Resources; David Atkins, Chief Executive
Organisational Responsibility	*Supply Chain: David Atkins, Chief Executive
Training and Awareness	*Knowledge and Reporting - Employees indicators (in particular "Proportion of employees given diversity training")
Monitoring and Follow-up	Supply Chain indicators including GRI HR2 and indicator on the "Number of suppliers assessed for their CR performance"

Summary of GRI Indicators

Upon the advice of our strategic sustainability advisors Upstream Sustainability Services, we have assessed ourselves as having fully completed 23 indicators (including at least one indicator under each of the six categories), thereby meeting the GRI Level B performance indicator reporting requirements. There are a limited number of indicators where we have not been able to report fully due to inavailability of data in 2009. However, we will report on these in future years where data is available. We will also incorporate guidelines from the GRI Construction and Real Estate sector supplement when these are made publicly available in 2011.

Management Approach and Performance Indicators		Core or Additional Indicator	Location	Full or Partial	Link to material issue
EC: ECONOMIC INDICATORS					
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and to governments.	Core	Performance Indicators pg 19 Connected Reporting Framework	Full	Knowledge and Reporting
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	Core	Chief executive statement Head of Sustainability Statement Legislation section Connected Reporting Framework (CRF) Carbon Disclosure Project submission on the CDP website Climate Change Adataptation and Mitigation report	Full	Climate change and energy
EC4	Significant financial assistance received from government.	Core	Performance Indicators pg 20	Full	Knowledge and Reporting
EN: ENVIROMENTAL INDICATORS					
EN2	Percentage of materials used that are recycled input materials.	Core	Performance Indicators pg 11	Not recorded in 2009	Resource use
EN3	Direct energy consumption by primary energy source.	Core	Performance Indicators pg 7	Partial	Climate change and energy
EN4	Indirect energy consumption broken down by primary source.	Core	Performance Indicators pg 7	Full	Supply chain
EN5	Energy saved due to conservation and efficiency improvements.	Adtl	Performance Indicators pg 7	Full	Climate change and energy
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Adtl	Climate Change section CRF Climate Change & Energy	Partial	Climate change and energy
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Adtl	CRF Stakeholder Engagement Table	Partial	Climate change and energy
EN8	Total water withdrawal by source.	Core	Performance Indicators pg 9	Full	Resource use
EN10	Percentage and total volume of water recycled and reused.	Adtl	Performance Indicatorspg 9	Full	Resource use
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Adtl	Performance Indicators pg 11	Full	Resource use
EN16	Total direct and indirect greenhouse gas emissions by weight.	Core	Performance Indicators pg 8	Full	Climate change and energy
EN17	Other relevant indirect greenhouse gas emissions by weight.	Core	Performance Indicators pg 8	Full	Climate change and energy
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Adtl	Climate Change & Energy Resource Use	Partial	Climate change and energy
EN19	Emissions of ozone-depleting substances by weight.	Core	Performance Indicators pg 8	Full	Climate change and energy
EN22	Waste by type and disposal method.	Core	Performance Indicators pg 10	Full	Resource use
EN23	Total number and volume of significant spills.	Core	Performance Indicators pg 11	Partial	Resource use
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Core	Climate Change and Energy Resource Use Supply Chain	Partial	Resource use
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Core	Performance Indicators pg 11	Full	Resource use

LA: LABOUR PRACTICES AND DECENT WORK PERFORMANCE INDICATORS					
LA1	Total workforce by employment type, employment contract, and region.	Core	Performance Indicators pg 16	Full	Knowledge and Reporting
LA2	Total number and rate of employee turnover by age group, gender, and region.	Core	Performance Indicators pg 17	Full	Knowledge and Reporting
LA10	Average hours of training per year per employee by employee category.	Core	Performance Indicators pg 17	Full	Knowledge and Reporting
LA12	Percentage of employees receiving regular performance and career development reviews.	Adtl	Performance Indicators pg 17	Full	Knowledge and Reporting
LA7	Rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities by region.	Core	Performance Indicators pg 18	Partial	Knowledge and Reporting
PR: PRODUCT RESPONSIBILITY PERFORMANCE INDICATORS					
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services, by type of outcomes.	Adtl	Performance Indicators pg 15	Full	Knowledge and Reporting
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Adtl	Performance Indicators pg 15	Full	Customers
SO: SOCIETY PERFORMANCE INDICATORS					
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	Core	Performance Indicators pg 13	Full	Community regeneration
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Adtl	Performance Indicators - pg 20	Full	Knowledge and Reporting
SO8	Monetary value of significant fines and total number or non-monetary sanctions for non-compliance with laws and regulations.	Core	Performance Indicators pg 20	Full	Knowledge and Reporting
SO: HUMAN RIGHTS PERFORMANCE INDICATORS					
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	Core	Performance Indicators pg 14	Full	Supply chain

Application of the GRI Guidance on defining report content and reporting quality

The process employed to apply the principles for defining report content and quality is summarised in the tables below.

GRI principles	Commentary
MATERIALITY	<p>Hammerson undertook a thorough materiality review of its sustainability impacts, including four of the five materiality tests put forward by AccountAbility, in 2007. Our study encompassed: a review of peer best practice; analysis of regulatory and societal norms; interviews with over 20 internal and external stakeholders, including CR group members; and analysis of those issues with a direct link to our financial performance. As a result of this we carried out two key activities. Firstly, we prioritised the five key issues (climate change and energy, resource use, community regeneration, supply chain, customers) upon which our sustainability strategy is now focussed and around which this report is structured. Secondly, we reorganised our internal management structure to three core working groups (see CR Management section) in order to take advantage of institutional sustainability capacity in these three key business operations.</p> <p>Through our involvement in industry forums, our engagement with stakeholders and our tracking of legislation we are continuously reviewing our approach to sustainability and the materiality of the issues that we address - for example in our 2009 report, this has led to a greater focus on employees in this year's reporting (See Training and Development section and Performance Indicators in the online report and pg 38-39 of the Annual Report). We intend to undertake another formal review of the materiality of our reporting and strategy in 2010.</p>
STAKEHOLDER INCLUSIVENESS	<p>The stakeholders to whom we consider ourselves accountable are explained in the Material Issues and Stakeholders section. Our focus during 2009 in both France and the UK has been on engaging significantly with both SRI and mainstream investors but we have also undertaken engagement activities with tenants, visitors, suppliers, staff industry bodies and community organisations. In particular, engagements with investors and industry bodies during 2008 have specifically led to the expansion of our key performance indicators, as well as the decision to utilise the Connected Reporting Framework and Global Reporting Initiative in the CR Report 2008. Please see our Stakeholder Engagement table for details of type of engagement, issues raised and responses received during the year.</p>
SUSTAINABILITY CONTEXT	<p>This report incorporates what we perceive to be the core global and national drivers of sustainability in the property sector and how we incorporate these trends into our CR strategy. Particular elements on how our performance relates to wider sustainability context include:</p> <ul style="list-style-type: none"> - our Chief Executive statement, which gives an overview of our CR strategy - our analysis of core legislative risks and opportunities in UK and in France - our inclusion and performance in industry benchmarks related to our material impacts including Jones Lang LaSalle Sustainability Benchmarking for our UK managed shopping centres and offices and BREEAM and HOE ratings for our developments - our inclusion and performance in various sustainability indices, including the DJSI, FTSE4 Good and Ethibel indices, as well as our position for the second year in a row in the Carbon Disclosure Leadership Index - our participation in relevant industry and government working groups on sustainability within the property sector.
COMPLETENESS	<p>Overview This report provides information on our performance in our material environmental, social and economic aspects, throughout the supply chain and across all of our corporate, asset management and development activities in the two countries where we operate. Additional information on our financial performance, corporate governance and Directors' remunerations is provided in our Annual Report and Accounts.</p> <p>Reporting of performance data for development portfolio We report on the sustainability performance of our developments under our supply chain indicators as we contract out all our construction activities.</p> <p>Reporting of performance data for investment portfolios We use the "operational control" approach defined in the Greenhouse Gas Protocol and therefore data in this report covers all assets under our direct or indirect management control in our investment portfolio. Our management control differs greatly by asset type and by country; these differences affect the level of influence we have over the sustainability performance of our assets. In the UK, we have in-house management services at three of our offices and at five of our shopping centres, whilst the management of our retail park portfolio and all other properties is all outsourced. In France, we are legal "co-owners" at the majority of our shopping centres assets with the exception of Italie 2, meaning we have a lesser degree of management control than at our UK properties. In 2010, we will review whether the operational control approach to reporting is the most appropriate in view of our French operational structure and upcoming legislative requirements in the UK and France.</p> <p>Inclusions:</p> <ul style="list-style-type: none"> - all assets fully held during 2009 - our French and UK assets where we have 100% ownership (e.g. Italie 2, all our retail parks and 3 of our 4 UK offices) - all assets where we have more than 25% ownership either through co-ownership in France or joint ventures in the UK (12 shopping centres, four retail parks and six managed offices) <p>Exclusions:</p> <ul style="list-style-type: none"> - assets with Fully Repairing and Insuring leases as we have no management control over those assets and therefore no ability to influence sustainability performance outside the leasing stage (e.g. Bishops Square, Puddle Dock) - properties that we disposed of in the course of 2009 (i.e. Avenue Retail Parks, Pincents Lane and Berkshire Retail Park, Seacourt Retail Park, Victoria Retail Park in the UK; Rue de l'Université and les Trois Quartiers, Cap Malo and St Omer Retail Parks in France; Forum Steglitz, our sole remaining asset in Germany) - properties that we do not directly managed in the UK (i.e. Cabot Circus) - assets that were opened in the course of 2009 (i.e. Union Square). Note that, although it opened in January 2009, 60 Threadneedle has been excluded from the normalised environmental performance indicators as the high vacancy rate at this property in 2009 distorts our sustainability performance - properties in our development portfolio and properties that we intend to redevelop in the short term (i.e. Faubourg St Honore and Burgan House). Note that Stockley House was in this category in 2008 but has now been included in the whole data set as no redevelopment is anticipated in the short term.
RELIABILITY	<p>Assurance and verification processes are currently performed by third parties on the majority of the data, content and processes but we are not yet ready to commit the significant resources to full third party audit and assurance. Please see Advisors Statement from Jones Lang LaSalle, Upstream Sustainability Services and Bureau Veritas in the Our Approach section. For information on the data assumptions and calculations, please refer to our environmental and financial methodological notes.</p>
CLARITY	<p>We have worked hard in the last two years to improve the accessibility and clarity of our CR reporting through stakeholder engagement.</p>
BALANCE	<p>We aim to disclose both negative and positive trends in performance on a year to year basis. For example, we discuss difficulties in engaging with our supply chain and customers in the Head of Sustainability statement and the Customers section.</p>
COMPARABILITY	<p>Our reporting covers three years' data; historical data can be accessed through our website. We take part in Jones Lang LaSalle Sustainability Benchmarking for benchmarking of environmental performance of our office and shopping centres and LBG International for benchmarking of our community investment performance.</p>
ACCURACY	<p>For information on the data assumptions, calculations and any restatements, please refer to our environmental and financial methodological notes.</p>
TIMELINESS	<p>This report covers 1 January - 31 December 2009.</p>