

Group Health and Safety Policy

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Part 1: Management Control And Scope

Management Control

To ensure compliance with all legal and other requirements, (including the Health and Safety at Work etc. Act 1974, our Health and Safety statement of intent, policy notes and our organisational responsibilities and arrangements) Landsec' Health and Safety documentation will be reviewed periodically as appropriate, and at least annually. Additional supporting policies and procedures are readily available to all employees and can be found within the Company's Knowledge Library. The Executive Director nominated as the Board Director responsible for Health, Safety and Security, being the Group's Chief Executive Officer, together with the Group Head of Health, Safety and Security will review this policy and associated safety management systems and make arrangements for amendments as necessary. It is also their responsibility to record the dates and outline the changes made as a result of such reviews.

Policy Review Status

The latest reviews and outcomes are as follows:

	Date of Review	Brief Description of Changes	Reviewers	Issue Date
1	15th March 2012	Full policy review due to changes in business functions and restructure.	Clive Johnson	2nd April 2012
2	28th March 2013	Full policy review, included Health & Safety Objectives, also minor changes to the fire policy and organisational structure.	Clive Johnson	2nd April 2013
3	24th March 2014	Full policy review, including new signatory of policy, health and safety training, fire policy and organisational structure	Clive Johnson	14th April 2014
4	20th March 2015	Full policy review, including signatory of policy, CDM 2015 update and organizational structure	Clive Johnson	1st April 2015
5	25th March 2016	Full policy review, including signatory of policy, new security and lead policy, managing agents and title changes	Clive Johnson	1st April 2016
6	6th April 2017	Full policy review, including signatory of policy, introduction of links to external documents.	Clive Johnson	18th April 2017

Scope

The scope of this policy covers all Occupational Health and Safety (OH&S) management arrangements for Land Securities Group PLC (the "Company"). This policy provides a framework, which defines how the Company will manage Occupational Health & Safety throughout its operations. These operations include the management of all our properties throughout the UK including sales and acquisitions, development of new and existing properties, and the day-to-day management of building environments by our staff. Also included are joint venture properties where we are responsible for their asset management and all offices occupied by Landsec itself.

This policy provides the foundation for the implementation of BS OHSAS 18001:2007 (Occupational Health and Safety Management System). This policy will be made readily available to any interested party.

The Group Head of Health, Safety and Security will establish, document, implement, maintain and continually improve an Occupational Health and Safety management system. This will include a separate document outlining specific OH&S system reference requirements, as necessary. This will enable the Company to develop and independently verify or certificate its Occupational Health and Safety Management System against this standard.

Part 2: Group Health and Safety Policy Statement

The Company is committed to providing a safe, healthy and secure working environment, equipment and systems.

We believe that the successful management of health, safety and security is fundamental to the wellbeing of our employees, contractors, service partners, occupiers, visitors to our properties and members of the public, who may visit properties that we are responsible for. It is also one of the means by which we create a better environment in which to work and is an essential component in assuring our continued performance and growth.

I have overall responsibility for the implementation of this policy within each respective business unit, and Group Heads of Department are responsible for the implementation of this policy and any associated procedures within their individual functions.

Our aims are to achieve continual improvement in health and safety awareness and performance, and to become an example of best practice in the practical application of health and safety management.

To achieve these aims we will:

- Consult with employees, contractors and service providers
- Only assign employees and contractors to do work that they are competent to do
- Appoint competent health and safety assistance
- Provide quality information, and the appropriate training and instructions relevant to specific job roles.
- Encourage good communication and co-operation
- Regularly review our health and safety performance and engage our employees in this process.

To demonstrate this, the Board is committed to providing adequate resources:

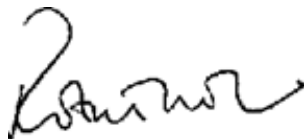
- To enable the Health and Safety Policy to be implemented, developed, monitored and reviewed
- To comply with and/or exceed our legal obligations.

Our Health and Safety Policy addresses our obligations under the Health and Safety at Work etc. Act 1974 and other relevant statutory provisions including 'The Management of Health and Safety at Work Regulations 1999'

For each area of the organisation, we will ensure that the health and safety impacts and responsibilities are risk-assessed, that suitable health, safety and welfare systems are developed and implemented, and that resources are made available for effective health and safety management. We will ensure that the health of our employees is not negatively impacted by their work, and will endeavour to enhance their wellbeing through the environments that they work in. We will achieve this by providing appropriate occupational health services and wellbeing initiatives.

Whilst the management structure identifies those who have specific responsibilities there is also a legal obligation placed on all employees of the Company, (who are responsible for co-operating with management and complying with the Health and Safety Policy) in order to achieve the Company's aims. All employees should acknowledge their own individual duties and responsibilities, to take reasonable care, and to prevent injuries to themselves, fellow employees and members of the public. This will be achieved by complying with the arrangements set out by each business unit for health and safety, by working safely and without risk to health at all times.

We are committed to ensuring that health and safety is integral to the way we do business. We all have a part to play in the promotion of a positive health and safety culture, using our knowledge and experience to promote continuous improvement in occupational health and safety management.



Robert Noel
Chief Executive

Date: 18th April 2017

Part 3: Group Health and Safety Policy – Notes

3.1 Health and Safety Objectives

1. Set the tone and push the boundaries as an informed and intelligent Client and Landlord
2. Inspire visible leadership in health, safety and security.
3. Provide a vision for behavioural change for our employees and supply chain.
4. Deliver safe, healthy and secure developments without incident.
5. Provide safe, healthy and secure places for our people work and our customers to shop and relax.
6. Treat health like safety across all our activities, with both physical and mental health in mind.

3.2 Risk Assessment and Control

Employers have a responsibility under Section 2 of the Health and Safety at Work etc. Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and of other persons who may be affected by their work activities.

The Management of Health and Safety at Work Regulations 1999 (as amended) provide continued and renewed emphasis on the total management strategy for preventing accidents and ill health in the workplace. One of the main requirements of the regulations is to undertake an assessment of the risks with regard to the health, safety and welfare of employees and others who may be affected by work activities.

These assessments are carried out in consultation with our employees or workers who may be affected by their work activity. All health and safety legal requirements, as well as other relevant contractual or industry standards, shall be identified wherever possible and the means of complying with these requirements incorporated into relevant procedures, so far as is reasonably practicable. The responsibility for implementing this policy note has been delegated to the individual business units. The specific responsibility and duties being discharged through the management structure to nominated competent managers, each of whom have a legal duty to ensure the health, safety and welfare of their direct reports. All managers are to ensure they attend when required the appropriate health and safety training in-line with their particular job role identified within the Company Health and Safety Training matrix.

3.3 Commitment to Continual Improvement

The Chief Executive, as the Board Director for Health, Safety and Security, is committed to ensuring health and safety standards are maintained and driven forward for continual improvement. This is achieved by the implementation of key health and safety objectives, set annually. These objectives are formulated from both pro-active and reactive elements. Although pro-active elements are preferred, lessons can be learned from investigations into accidents and incidents that occur within the business. The responsibility for implementing this policy has been delegated to the management team and operational structure in place. The specific responsibilities and duties are discharged to nominated managers, each of whom have a responsibility to the commitment for continuous improvement.

3.4 Commitment to Appropriate Resources

The Board will ensure through the Chief Executive, as Board Director for Health, Safety and Security that sufficient and appropriate resources for the delivery of health and safety are in place within the Company. This will be determined by the Health, Safety and Security management structure in each business unit with line managers ensuring all health, safety and security responsibilities and duties are discharged effectively in accordance with business unit policies and procedures.

3.5 Training

The legal requirement to undertake training is broadly covered in the duties of Section 2 of the Health and Safety at Work etc. Act 1974. This imposes a general duty on employers to provide as much information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of employees. This duty can also extend to other person's employees. The Company has a Health and Safety Training Policy, which outlines our commitment to health and safety training for all our employees, ensuring that we:

- Will identify training needs and requirements during the recruitment process of new employees and we recognise that newly trained employees should also receive close supervision to check they are competent to carry out their duties safely and in a healthy manner;
- Provide health and safety induction training for all new employees, including both permanent and non-permanent team members;
- We should ensure that we cater for inexperienced workers, disabled workers, migrant workers (for whom English may not be their first language) and those workers with low levels of literacy;
- Engage employees in the planning of training sessions and ensuring our contractors have received adequate training so as not to pose a risk to the other workforce should be considered as part of our overall plans for the provision of training courses;
- Provide the appropriate health and safety training for all employees in line with the requirements of their role as detailed in the Health and Safety Training Matrix;
- Ensure that all employees have the mandatory training requirements before commencement of employment and, within 6 months, all mandatory training has been either completed or the training has been formally booked;
- Monitor the training matrix and ensure it is updated as and when required and engage in a full review annually;
- Ensure that new requirements or refresher training requirements are identified for all individuals and captured through the annual PDR process;
- Ensure that employee health and safety representatives are adequately trained;
- Ensure the engagement of competent staff;
- Seek feedback via our training evaluation form from employees on the value and effectiveness of the training and their development, also ask what other training requirements they feel are needed. This information will then be used to assess and improve the training and development process;
- The recording of training given and received.

The Company and the Main Board Directors will ensure (through the Chief Executive as Board Director for Health, Safety and Security) that other specific legislation and regulations that require certain types of training (e.g. First Aid, Construction (Design and Management) Regulations 2015 (CDM), Asbestos Awareness and Working at Height etc.) will be identified and made available through the Company Health and Safety Training Matrix for each Company job role, under the headings of Mandatory and or Desirable.

3.6 Monitoring and Audit

Through the Chief Executive, as Board Director for Health, Safety and Security, appropriate monitoring and auditing will be undertaken. These requirements will be discharged through the Group Head of Health, Safety and Security and the management structure to ensure that measures are in place to audit health and safety policies and procedures and monitor their implementation.

Audits form a vital part of the management of health and safety. The aim of the audit is to obtain an objective view of current health and safety practices and indicate areas of concern where improvement is both desirable and attainable. This is achieved through review of the policy, organisation, planning and implementation, and measuring and reviewing performance. The Company also has at its disposal an Internal Audit team, who carry out internal periodic audits of the health, safety and security team's policies, procedures and their implementation with the findings shared with the Company's Audit Committee.

We regularly monitor through health and safety visits across our diverse portfolio. Action is taken as necessary.

3.7 Accident and Incident Management

Through the Chief Executive, as Board Director for Health, Safety and Security, the Board will ensure that appropriate procedures are in place for accident reporting and investigation and for reporting and monitoring work-related ill health. These procedures will include arrangements for taking corrective measures to prevent accidents or ill health reoccurrence and where necessary for reporting injuries, diseases and dangerous occurrences to the relevant enforcing authority.

The incident management system (AIR) will be utilised to ensure all incidents are recorded internally and information provided on them in a timely fashion, allowing for any subsequent reviews and recommendations of associated policies and procedures. Information from this system will also be used for the internal reporting of accident and incident trends to the Group, London and Retail Health, Safety and Security Committees and the Board as appropriate. The accident management system applies to all accidents and incidents which result in or could have resulted in injury or damage to people or property controlled by the Company.

3.7.1 Reporting and Recording Accidents and Incidents

All accidents and incidents will be recorded on the accident management software package AIR. Managers for staff involved in an accident are responsible for ensuring that a record is made of the incident.

Accident investigation enables the Company to understand the circumstances surrounding the accident or incident and learn lessons to reduce the risk of any recurrence. This ensures that people and property are protected. The Company will:

- Thoroughly investigate accidents and incidents in a timely fashion, taking into account appropriate remedial action to prevent further occurrences. This can help demonstrate to a court that the Company has a positive attitude to health and safety;
- Prepare a report where appropriate highlighting recommendations and remedial actions;
- Review and improve existing control measures when a tangible benefit can be achieved.

Line managers are responsible for investigating accidents or incidents to employees, contractors and visitors within their responsibility/department. Accidents or incidents should also be investigated with high priority, while evidence is still available (and before people's memories fade).

3.7.2 RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013)

If a serious injury or ill health is reported concerning an employee or other person affected by its undertaking, the accident investigation will indicate whether the incident is reportable to the authorities under RIDDOR (the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013). It is essential that serious accidents, ill health and any dangerous occurrences are brought to the attention of the health, safety and security team at the earliest possible stage to enable them to evaluate whether it is reportable. Training will be provided to those who have responsibility for this function.

3.7.3 Accident Investigation

For more serious accidents, or where several minor accidents indicate a trend, an accident investigation will be carried out as soon as practicable. The investigation will be discreet and thorough and signed statements will be requested from the injured party and from witnesses.

3.7.4 Accident and Incident Review and Analysis

Accident and incident analysis is regularly undertaken by the health, safety and security team to seek and identify any trends to enable the Company to plan and budget for improvements and identify any training needs. Lessons learnt are identified and shared as appropriate. An annual and quarterly review of all accidents and incidents will be reported in the Group, London and Retail Health, Safety and Security Committee Reports. These are shared with the Landsec Executive Committee quarterly and Non-Executive Committee bi-annually.

Significant and reoccurring incidents, as well as the lessons learnt from them, are shared regularly with the relevant Customer Improvement Groups.

3.7.5 Accident and Incident Records

Records will be kept for five years. Records to be kept will include:

- A report on every accident and incident investigated to be held electronically on the AIR accident management system;
- A copy of every F2508 sent to the relevant local authority in accordance with RIDDOR 2013 will also be held electronically on the AIR accident management system.

3.8 Emergency Preparedness

Plans and procedures for responding to emergency situations are periodically tested and reviewed. The aim of these plans and procedures will be to prevent and reduce the likely effects on the health, safety and welfare of employees and others in the event of unplanned emergency incidents. Appropriate information, instruction, induction and training will be provided in the implementation of these procedures.

3.9 Fire Risk Management

We will ensure that our specific Group Fire Safety Policy Statement is communicated accordingly. Fire risk assessments will be carried out by a competent person for common areas of each site that the Company has management responsibility for, reducing the likelihood and severity of a fire occurring. In order to provide a coordinated approach to fire safety in multiple occupancy sites, tenants are requested to advise the Company of any significant findings from their own fire risk assessments for their own demised areas. In addition, fire drills are carried out 6 monthly in order to provide a coordinated approach to the evacuation plans in place at each site.

A comprehensive fire management plan will be developed for each premises that the Company has management responsibility for. This will contain the engineered design for alarm activation, detection and evacuation of the premises.

A Fire Safety Manual (or Log Book) will be available at all sites where the Company has management responsibility and will contain maintenance records, emergency plans, evacuation history, relevant checks of life safety systems and site plans.

Employees engaged in fire marshal or fire warden duties will be suitably trained and capable to carry out their duties.

The Group Head of Health, Safety and Security is responsible for the implementation of the Fire Safety Policy. Heads of Departments are responsible for the implementation of this policy within their areas with the support of the Group Health, Safety and Security Team and our external Fire Consultant who will ensure that appropriate auditing and monitoring of the fire safety systems are in place.

3.10 The Construction (Design and Management) Regulations 2015

The management of construction and related works within the Company will be discharged through the appropriate business departments, with the support and commitment from the respective Board Directors and the Group Health, Safety and Security Team.

Each Business Unit will comply with the relevant operational procedures, as set out in the CDM One Best Way suite of documents to address the requirements of the Construction (Design and Management) Regulations 2015 (the CDM 2015 Regulations), and any related construction and contractor management best practice and guidance. The appropriate member of the Group Health, Safety and Security Team will play an active part in assisting, coordinating and monitoring such arrangements.

Construction work poses serious hazards, for example; exposure to occupational diseases, asbestos, manual handling, work at height or moving plant/vehicles. The risks to health and safety from construction hazards must therefore be properly controlled. Health and safety is integral to how everyone approaches construction related works.

All those involved in the Company's construction related works and projects must give the management of health and safety a high priority and comply with all associated CDM 2015 Regulations policies and procedures.

The Company, as with other construction clients, has a substantial influence and contractual control over its projects to determine the style, tone and culture and as such the emphasis of the CDM 2015 Regulations is on making clients, such as the Company, accountable for the impact their approach has on the health and safety of those working on or affected by their project.

This emphasis on client responsibility and accountability is one of the key elements in the CDM 2015 Regulations whilst also placing greater emphasis on competence; not only of organisations but also of individuals.

The CDM 2015 Regulations also emphasise the integration of health and safety into the management of the project and to its future operational use to encourage an integrated team approach and improve the planning and management of projects from the very start.

3.10.1 Client Duties

The Company accepts that it is accountable for the impact it has on health and safety standards. All construction related works and projects (whether 'Notifiable' to the HSE or not) the Company's London and Retail Development teams will:

- Make arrangements for managing a project through its lifecycle – and check these are being maintained throughout;
- Make competent appointments; employing only organisations or individuals with the relevant skills, knowledge, training and experience e.g. (Principal Designers, Designers, Principal Contractors, Contractors including Directs, and other team members);
- Notify applicable projects to Health and Safety Executive;
- Provide Pre-Construction Information to the right people in good time;
- Ensure a Construction Phase Health and Safety plan is in place, pre-construction;
- Provide enough time and resource to allow the project to be delivered safely and without harm to health;
- Make suitable provisions to monitor and ensure the Principal Designer and Principal Contractor comply with their duties;
- Inform the contractor how much time will be allowed for planning the project;
- Co-operate with other duty holders and co-ordinate store operations in order to ensure the safety of those carrying out construction work;
- Take steps to ensure arrangements are made for managing the projects; taking reasonable steps to ensure that the project is suitably managed throughout;
- Make sure that suitable welfare is supplied to every site at all times (allowing adequate space);
- Make sure that the building works in respect of design and materials complies with The CDM Regulations 2015 and The Workplace (Health, Safety and Welfare) Regulations 1992;
- Provide necessary information about the site, particularly any constraints that may affect health and safety. Also provide other relevant information e.g. Asbestos surveys, details of services, existing Health and Safety Files etc.

The regulations will apply 'in full' to all projects; notification no longer triggers additional duties.

3.10.2 Tender – Provision of Health and Safety Information

The Company will provide adequate health and safety information on the scope of proposed contracts where applicable and allocate sufficient time and resources for the tender process.

To successfully compete in the tender process and to assist the Company assessing the skill, knowledge, training and experience, contractors must provide supporting documentation that clearly demonstrates a structure and commitment to managing safety and health. Throughout this process the contractors will also be subject to Landsec Health and Safety Audit prior to being appointed.

3.10.3 Contractor Commitment

Contractors are expected to comply with all appropriate company operating procedures or restrictions, sign up to our Health and Safety Pledge and ensure that their employees and sub-contractors are aware of the relevant sections of this policy and have the skill, knowledge, training and experience to carry out their undertaking safely and without risk to health. All personnel under the control of the contractor must be made aware of local emergency, evacuation and contingency plans; and

- Bring to our attention any hazard arising from their work activity;
- Immediately report to us incidents and accidents occurring as a result of their work activity;
- Co-operate with accident and incident investigations.

The Company is committed to undertaking an annual review using established internal and external processes to monitor and review the success of contracts and to confirm risk management performance of the contractors.

3.10.4 Contractor Management

The Company aims to provide clear guidelines to contractors to enable adequate planning before contractors are invited to work on Company controlled premises. We take all reasonable steps to form the right partnerships with contractors, ensuring that the people and organisations, with whom we work, meet our health and safety competence requirements and they are both experienced and technically competent. Because of our operational diversity, many different contractors may be involved in the successful management of our portfolio. Our business relies implicitly on their skills, knowledge, training and experience to carry out their works without risk to the safety and health of their workforce third parties.

We require contractors to provide competent personnel with the appropriate skills, knowledge, training, experience and expertise, plant and equipment necessary to carry out their work activity safely and without risk to health. We reserve the right to discontinue the engagement of any contractor who fails to meet our expectations and standards.

From time to time the Company may need to employ the services of professional contractors e.g. Project Manager, Construction Manager and System Project Managers to support the business needs procured via our approved suppliers list. The management of such contractors is the prime responsibility of the department head. Their health and safety competence must be in-line with the job profile identified within the Health and Safety Training Matrix and as such be treated as fully employed staff.

3.11 Managing Agents

The Managing Agents that have been contracted to manage property on behalf of Landsec will be responsible for managing health and safety within the common parts of the property.

The exact boundaries of control between Occupiers and the Managing Agent will be clearly defined within the occupiers' leases.

In all circumstances the Managing Agent has a responsibility to co-operate and co-ordinate with all occupiers on issues that affect any part of the property. This spirit of co-operation and co-ordination should run through all dealings between occupiers and managing agents, particularly where health and safety issues are concerned.

The Managing Agent is expected to implement its own policies, procedures, management systems and control measures in relation to work activities, physical, environmental or premises hazards, as is deemed appropriate to comply with the requirements given in legislation, guidance or any relevant Landsec One Best Way Standards.

3.11.1 Contractor Management

Managing Agents must comply with the requirements set out in CDM 15 for both their own managed works and tenants' works.

3.12 Asbestos Management

The Company will ensure that a specific Asbestos Policy Statement is produced and supported by a Management Plan with specific procedures and communicated accordingly. The Company recognises that exposure to asbestos fibres presents a potential health risk to individuals and is committed to meeting or exceeding all legal requirements as defined within Regulation 4 of the Control of Asbestos Regulations 2012 and associated Health and Safety legislation. The company shall take every practical step to ensure that no employee; employees of our service partners, contractors, clients or customers; or any visitor to any facility owned or managed by the Company is knowingly exposed to asbestos fibres. The Company shall only employ appropriately vetted UKAS accredited asbestos consultancies to undertake asbestos surveying and associated activities and will only use appropriately vetted licensed asbestos removal contractors to undertake asbestos abatement works.

3.13 Health and Safety Management System Review

With the assistance of the Health, Safety and Security Team, the Board will ensure (through the Chief Executive as Board Director for Health, Safety and Security), a periodic review (annual) of the effectiveness of the Company's Health and Safety Management System.

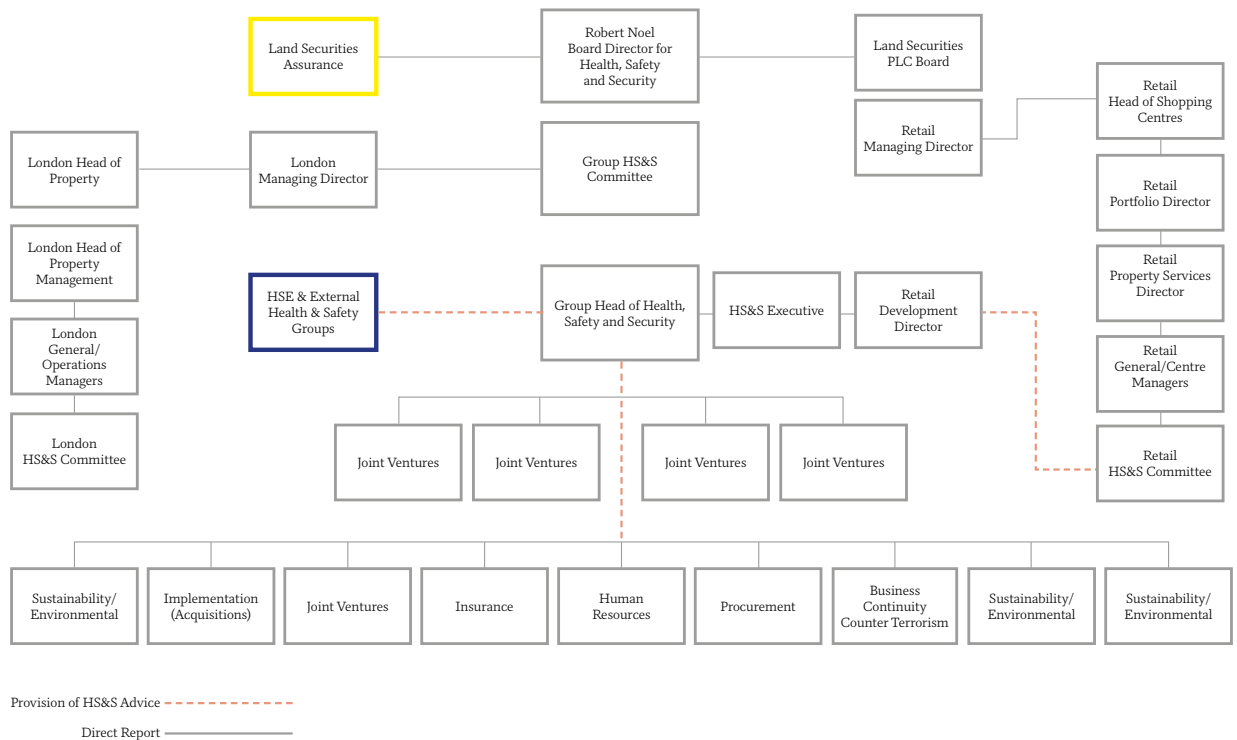
The Group Head of Health, Safety and Security will advise and update the Group Health, Safety and Security Committee and the Board with the findings following such a review. These findings will be assigned to the appropriate persons with target dates for completion. Where deemed necessary as a result of the review, changes will be made to the Company's policies, procedures and objectives.

3.14 Occupational Health and Wellbeing

The Company as an Employer of Choice recognises the importance of both the physical and mental health and wellbeing of its employees. The Company acknowledges that the successful management of its business relies on its ability to recognise, predict and adapt to the changing demands on its people. In order to support our employees, we have at our disposal a number of robust policies governing their health and wellbeing. We encourage and actively promote the use of our private medical scheme, wellness website and confidential employee assistance programmes. Risk Assessments, Health Surveillance initiatives and DSE (Display Screen Equipment) reviews are conducted regularly throughout all the Company's locations and action plans supported by learning and development interventions are implemented with Board support.

In all development and project works we undertake, we aim to influence and inform our designers and contractors to ensure all developments are designed and built with health, as well as safety, risks at the forefront of their decision making. We strive to deliver developments that have eliminated all health risks during construction and throughout the whole life cycle of the building, creating a healthy building as the norm.

Part 4: Structure, Governance, Responsibilities/Roles, Consultation/Communication



4.2 Governance

In the interest of maintaining a high level of internal control in respect of health and safety management, the Company will ensure that the governance and organisational structure outlined in 4.1 above will be maintained, [unless the Board determines otherwise]. The related health, safety and security management governance terms of reference are described in Appendix 1.

4.3 Roles and Responsibilities

Both general and specific health, safety and security responsibilities and roles are outlined in Appendix 2. Notwithstanding the responsibilities and roles outlined within this policy, the Company may also include specific responsibilities within Job Descriptions and health and safety policies and procedures. Where such additional responsibilities arise, the Company will communicate this to individuals.

4.4 Consultation and Communication

The Company is required to consult employees or their elected representatives on the following issues:

- The introduction of any measure at the workplace, which may substantially affect the health, safety and wellbeing of the employees;
- Engaging with employees in the planning and organisation of any health and safety training;
- The arrangements for nominating 'competent' persons to assist the employer on health, safety and security matters and to take charge of measures to combat serious and imminent danger i.e. safety staff, fire wardens/marshalls/stewards;
- Any statutory health, safety and security information, which should be provided to the employees;
- The health, safety and security team constantly engage with the employees and contractors via our Continuous Improvement Groups;
- Directors and Senior Manager Health, Safety and Security Tours are carried out on a quarterly basis either at our centres or our developments.

In addition, where appointed, Employee Representatives must be provided with adequate training for their roles, reasonable time off with pay and appropriate assistance and facilities in order to fulfil their roles.

External Health and Safety Communications are in place with various stakeholders, but as a minimum the Company liaises and communicates on a quarterly basis with all tenants and key service providers in both the London Office and Retail Portfolios. Tenants are invited to attend internal tenant/retailer liaison meetings with the Company, of which health, safety and security matters, initiatives and requirements are discussed. Service Partners are met with on a quarterly basis for both Soft Services (Security and Cleaning) and Hard Services (MEBF) through specific health, safety and security meetings.

In addition, there is periodic communication with the local enforcing authorities, both EHO and the HSE as appropriate to business activities, in relation to both general health and safety matters and also fire safety matters. This is on a pro-active basis and both the Retail and London Office teams often invite local enforcing officers to site in order to discuss fire and general health and safety matters and initiatives.

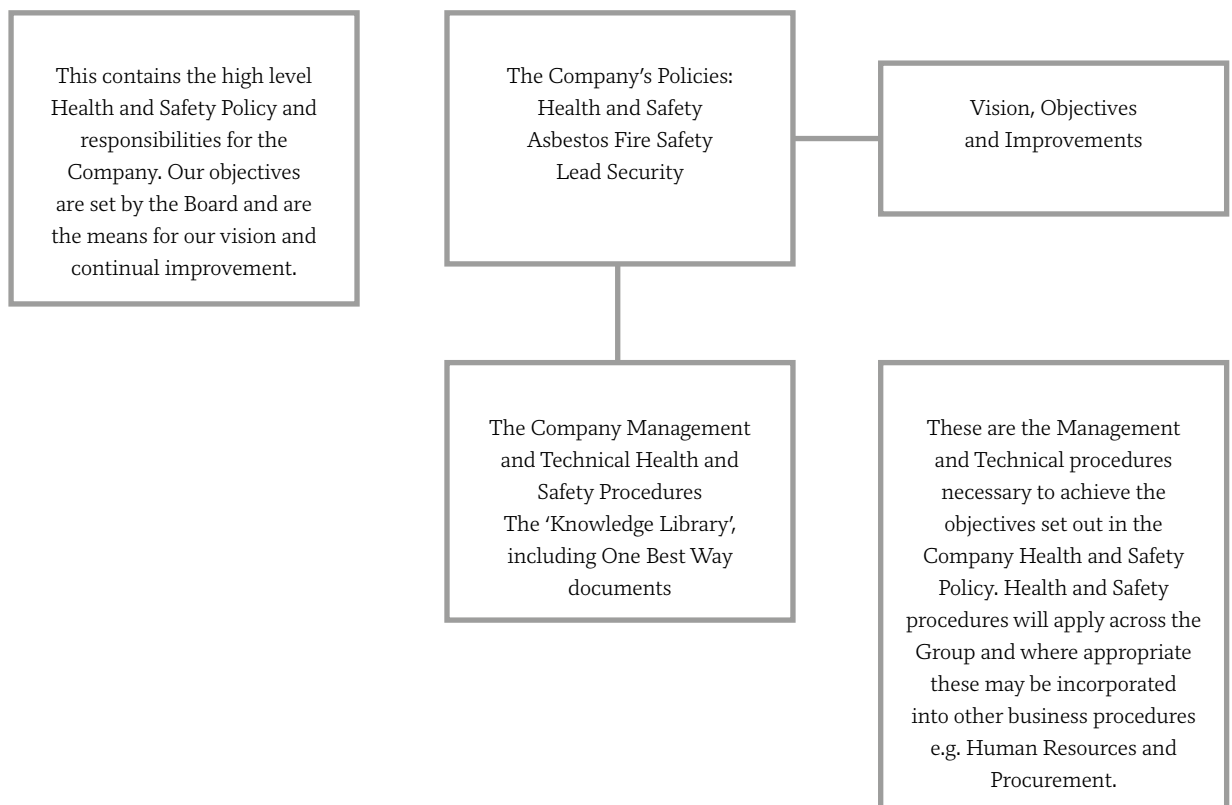
Part 5: Arrangements

5.1 London and Retail Business Units

To discharge effectively the statement of intent and the policy notes, each business unit will be required to coordinate with the Group Head of Health, Safety and Security, to develop and implement procedures and safe systems of work to address the risks associated with their activities and ensure a consistent approach. To that end, comprehensive procedures, guidance notes and forms have been established within the "Knowledge Library" to address the specific business unit requirements. The documents within the "Knowledge Library" are controlled documents.

For further health and safety guidance and non-procedural material the Company's Health and Safety intranet website hosts all this information. The Health, Safety and Security Team are always available for guidance, assurance and assistance as appropriate.

5.2 Health and Safety Document Structure



Appendix 1: Health, Safety and Security Governance

App 1a: Land Securities Group PLC Board

The Board's key role is to guide, endorse and support the implementation of Health, and Safety Policy and strategy for the Group, and to consider the Health, Safety and Security implications of all business decisions referred to it for approval. Board members also have individual responsibilities for health, safety and security and this document defines these responsibilities.

The Board is committed to achieving the highest standards of Corporate Governance. Health, safety and security has a firm standing on the Board's agenda and the Board conducts an in-depth review of health and safety matters on an annual basis.

App 1b: Executive Committee

The key responsibility of the Executive team is to provide leadership and commitment for the continuous improvement of Health, Safety and Security within the Group. This team will nominate one of its members to be Board Director for Health, Safety and Security within the Group and will also chair the Group Health, Safety and Security Committee.

The Executive Committee will ensure that Health, Safety and Security risks are being identified, assessed and effectively managed. This committee will also consider the Health, Safety and Security implications of all business decisions referred to it for approval, and for ensuring the involvement of, and consultation with, all appropriate staff.

App 1c: Group Health, Safety and Security Committee

The aim of this committee is to undertake a quarterly review of Health, Safety and Security Strategy within the Group and will be chaired by the nominated Board Director for Health, Safety and Security. This committee will comprise of:

- The nominated Board Director for Health, Safety and Security
- Director of Risk Management and Internal Audit;
- Group Human Resources Director;
- Group Head of Health, Safety and Security;
- Group Head of Information Systems;
- London Head of Property Management;
- Retail Property Services Director;
- Executive and Non-Executive Board directors (by invitation);
- Other representatives (by invitation e.g. legal).

The key objectives of this committee include:

- Preparation of the Health, Safety and Security submission for the six monthly or Annual Board Report
- Reviewing and updating the Company Policy Statements;
- Bringing together strands of portfolio, development and occupational health and safety;
- Ensuring that there is sufficient resource to enable the Health, Safety and Security Team to support the business units;
- Review progress against the Company Health and Safety Objectives;
- Reviewing the extent of corporate change and its implications on health, safety and security;
- Reviewing the training of Board Directors and employees;
- Reviewing the benchmarking targets for Risk management and Sustainability;
- Reviewing security arrangements across the group and discuss any topics, risks or concerns;
- To review and consider recommendations from respective London and Retail Health, Safety and Security Committees.

App 1d: Group Assurance Forum

The primary function of the Assurance Forum is to assist in the co-ordination of assurance activities across the Group by promoting the exchange of knowledge and experiences between each assurance function within the Group.

The forum shall meet at least four times a year with further meetings held at any time deemed necessary and may be called by any of the members.

App 1e: London Portfolio Health, Safety and Security Committee

The aim of this committee is to undertake an operation review of health safety and security management within the Group functions and the London Portfolio. The committee will be chaired by the Head of Property Management, London and will meet every three months with representatives from across all business teams/functions.

The objectives of the committee are:

- To make formal recommendations to the Group Health, Safety and Security Management Committee of any significant Health, Safety and Security matters;
- Discuss any new or revised Health, Safety and Security policies and arrangements issued by Group Head of Health, Safety and Security;
- Align Health and Safety initiatives around our company health and safety objectives
- To provide a forum for discussion on Health, Safety and Security matters relevant to the activities of the London Portfolio;
- To establish, communicate and review the Health and Safety Management System including policies and procedures, and to review the implementation of such documents throughout the business;
- To monitor continuous progress and quality of Health and Safety policies, procedures and associated activities;
- To review, monitor and discuss statutory compliance across the portfolio;
- Review and consider trends in accident and incident report statistics, including a review of any major events;
- Consider the risks relevant in London operations from other business units such as Development/ Building, Surveying and Engineering department;
- Monitor the risk assessment progress and ensure future programmes capture all business risks;
- Ensure that all work considers Environment Impact (where appropriate) and is in compliance with the company's Environment Policies;
- Discuss current and future Health and Safety topics, risks or concerns;
- Discuss current and future Security topics, risks and concerns;
- Promote a positive Health, Safety and Security culture through every aspect of the business;
- Consider the business training needs, ensuring sufficient resource is allocated to develop and deliver and the take up of any training offered;
- To make formal recommendations to the Group Health, Safety and Security Committee on all significant Health, Safety and Security matters.

App 1f: Retail Portfolio Health, Safety and Security Committee

The aim of this committee is to undertake an operational review of Health, Safety and Security Management within the Retail Portfolio. The committee will be chaired by the Property Services Director and will meet every three months with representatives from across all teams/functions.

The objectives of the committee are:

- To make formal recommendations to the Group Health, Safety and Security Management Committee of any significant Health, Safety and Security matters;
- Discuss any new or revised Health, Safety and Security policies and arrangements issued by Group Head of Health, Safety and Security;
- Align Health and Safety initiatives around our company health and safety objectives
- To provide a forum for discussion on Health, Safety and Security matters relevant to the activities of the Retail Portfolio;
- To establish, communicate and review the Health and Safety Management System including policies and procedures, and to review the implementation of such documents throughout the business;
- To monitor continuous progress and quality of Health and Safety policies, procedures and associated activities;
- To review, monitor and discuss statutory compliance across the portfolio;
- Review and consider trends in accident and incident report statistics, including a review of any major events;
- Consider the risks relevant in retail operations from other business units such as Development/ Building, Surveying and Engineering department;
- Monitor the risk assessment progress and ensure future programmes capture all business risks;
- Ensure that all work considers Environment Impact (where appropriate) and is in compliance with the company's Environment Policies;
- Discuss current and future Health and Safety topics, risks or concerns;
- Discuss current and future Security topics, risks and concerns;
- Promote a positive Health, Safety and Security culture through every aspect of the business;
- Consider the business training needs, ensuring sufficient resource is allocated to develop and deliver and the take up of any training offered;
- To make formal recommendations to the Group Health, Safety and Security Committee on all significant Health, Safety and Security matters.

Appendix 2: Health, Safety and Security Roles and Responsibilities

General Responsibilities and Duties

App 2a: All Employees and those who work on behalf of the Company

All employees and those who work on behalf of the Company on our premises have specific duties under health and safety legislation and will:

- Make themselves familiar with and conform to the Company Health and Safety Policy and any associated Company policies procedures at all times, which can be found on our internal Knowledge Library;
- Take a mature and intelligent attitude towards health, safety and security, and do all that is reasonably practicable to minimise the possibility of any accident occurring through their acts or omissions;
- Complete as part of their induction the Company e-learning Health and Safety Modules and Display Screen Equipment Assessment and ensure they liaise with their Line Manager and Learning and Development to arrange where necessary any health and safety training associated with their job profile;
- Stop any work activities/practices being undertaken by them or others, which they believe to be unsafe (don't walk by). They must then inform their line manager, who will obtain further advice from the business unit Health, Safety and Security Team, as appropriate;
- Ensure all incidents, accidents, and property damage is reported to their line/contract manager;
- Co-operate with their managers in implementing the requirements of all appropriate health and safety legislation, related codes of practice and safety instructions;
- Ensure that any equipment issued to them to carry out their work activities or for which they are responsible, is correctly maintained, tested, calibrated, used and properly stored by trained and competent persons;
- Bring to the attention of their manager or other responsible persons any potential health and or safety hazards, near miss or close call. The manager will then ensure that appropriate action is taken to either eliminate identified hazards. The Company through its health and safety training and relationships with its employees promote an open culture for the reporting of such events.

App 2b: All Managers

All managers are accountable to the Head of their department for all health and safety matters within their control and will:

- Effect the practical implementation of the Company Health and Safety Policy and associated Company procedures and any training received;
- Ensure that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of employees or others who may be affected by their activities and that rules, procedures and codes of practice involving the health and safety of employees and others, are prepared and implemented;
- Ensure only authorised, qualified and competent people are assigned to each task and that, where necessary, safe systems of work are in operation. This includes responsibility for ensuring that employees attain the level of training and understanding commensurate with the tasks to be carried out;
- Ensure that their areas of responsibility are subjected to regular audit, survey and inspections and that subsequent remedial activity are co-ordinated throughout all business activities;
- Facilitate and co-operate with those undertaking safety surveys/audits and inspections. As a result of such surveys/audits and inspections, they will initiate all reasonably practicable corrective measures to eliminate or reduce hazardous conditions/unsafe acts in consultation with the Health, Safety and Security Team;
- Ensure all accidents, incidents and near misses in the Company demise are reported through the AIR application. Reportable events to the Health and Safety Executive (HSE) must be managed in line with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR) Regulations 1995 rev 2013;
- Review all necessary reports on accidents and incidents, and to ensure where necessary, that a full investigation is carried out and appropriate remedial actions are taken;
- Ensure for the arrangement and co-ordination of effective emergency procedures within their area of responsibility;
- Ensure that all members of staff under their control have any specific health and safety responsibilities (where applicable) written into their personal job descriptions, and that induction and 'on the job' training initiatives are developed to provide safe systems of work/practice with regard to hazardous operations, substances, machinery or equipment and services. Training records should be maintained by managers and Learning and Development so as to provide evidence of satisfactory completion and understanding;
- Take appropriate action and ensure prompt attention where an employee or others raise comments or concerns regarding health and safety. This includes communicating with employees and others to ensure everyone is aware of the person responsible for overall health and safety at their site;
- Ensure all appropriate risk assessments and display screen equipment (DSE) assessments within their area of responsibility are undertaken, and that employees are made aware of the findings with any actions discharged accordingly within stated timeframes;
- Assume the authority and responsibility to stop or alter circumstances that are considered to present an immediate risk of serious injury, ill health or property damage;
- Where appropriate, implement the Company procedures and arrangements for managing contractors on site.

App 2c: Heads of Department

All the Heads of Department are accountable for all health and safety matters that are within his/her control and will:

Ensure that the Company Health, Safety and Security Policy is effectively implemented within the areas of his/her control together with the arrangements necessary to maintain compliance with statutory requirements;

- Ensure that adequate arrangements for joint consultation are in place in accordance with corporate policy;
- Delegate to others as appropriate, the responsibilities for health, safety and security whilst ensuring that they are clear and understood and that there is full accountability in line with company policy and statutory requirements;
- Advise the Chief Executive as Director responsible for Health, Safety and Security and the Group Head of Health, Safety and Security on any significant health, safety or security issue that may affect the Company encouraging commitment to health, safety and security through the Group Executive Committee of the Company;
- Ensure for the effective transition of health, safety and security arrangements for all new business and joint ventures as required;
- Ensure appropriate procedures and arrangements are established and maintained for the reporting and investigation of reportable accidents and significant incidents;
- Arrange for the implementing of adequate monitoring procedures to evaluate safety performance of staff and contractors, through comprehensive and appropriate inspection and audit programmes;
- Ensure that any contractors undertaking engineering works on the Company's properties have been selected and appointed in accordance with Company procedures;
- Liaise directly with the Health, Safety and Security Team on matters of health, safety and welfare
- Instigate specialist audits through the Health, Safety and Security Team;
- Ensure that employees under their control and direction receive training appropriate to their task and records are maintained and are easily retrievable;
- Ensure that risk assessments are undertaken for employees under their control; ensure risk assessments are suitable and sufficient, and that (within their powers) control measures are implemented;
- Delegate to others as appropriate, the responsibilities for health and safety whilst ensuring that they are clear and understood, and that there is full accountability in line with company policy and statutory requirements.

App 2d: Executive Directors

Responsibilities are recorded in the Company Annual Report and Accounts:

- Group Chief Executive: Robert Noel (Board Director with specific responsibility for health, safety and security across the Company)
- Chief Financial Officer: Martin Greenslade

The Executive Committee, in line with current legislation and best management practice, will:

- Ensure that there is an effective policy for health and safety within the Company, and that this policy and any revisions are brought to the attention of all staff;
- Nominate an Executive Director to undertake the role of the Board Director for Health, Safety and Security;
- Ensure that the Company has sufficient access to competent health and safety advice and Security assistance;
- Implement and periodically appraise the effectiveness of these policies and ensure that any necessary changes are made, principally through the Executive Director nominated as the Board Director for Health, Safety and Security and Group Head of Health, Safety and Security for implementation;
- Ensure that the Board receives a regular update on health, safety and security matters.

All Executive Directors are accountable for all health, safety and security matters within their control and have the following responsibilities:

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- To formally and publicly accept their collective role in providing health, safety and security leadership within the organisation and ensure that health and safety risks are adequately controlled;
- To provide on-going commitment to continuous improvement in health and safety performance and develop the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions;
- To accept their individual role in providing health and safety leadership to the business units and ensure that all board decisions reflect their collective health and safety intentions;
- To ensure they are kept informed of, and alerted to, relevant health and safety risk management issues and recognise their roles in gaining the co-operation of their staff in ensuring the proactive approach to improving health and safety standards. Ensure that an annual review and report on the health and safety performance is published.

Key Roles with Specific Additional Responsibilities

App 2e: Any Employee managing construction projects

For all projects, any employee managing construction projects must comply with the requirements of the Construction (Design and Management) Regulations 2015, as set out in 3.10, and associated documents within the "Knowledge Library", and must:

- Ensure the competence and resources of all appointees;
- Ensure that there are suitable management arrangements for the project welfare facilities;
- Allow sufficient time and resources for all stages of the construction process;
- Provide pre-construction information to designers and contractors.

Where the project is also formally notifiable", or has more than one contractor under the Construction (Design and Management) Regulations 2015, such an employee must, in addition:

- Formal notifications only - complete the HSE's on-line F10 and forward to the Group Head of Health Safety and Security for signature;
- Appoint a Principal Designer;
- Appoint a Principal Contractor;
- More than one contractor but not formal HSE notification – complete the Landsec project notification form and send to the Group Head of Health, Safety and Security for signature;
- Make sure that construction work does not start unless a construction phase plan is in place and there are adequate welfare facilities on site;
- Provide information relating to the Health and Safety file to the Principal Designer;
- Retain and provide access to the Health and Safety file.

Additional procedures and guidance are available via the "Knowledge Library".

App 2f: Employees responsible for heading Engineering Functions

In addition to general responsibilities, respective Heads of Engineering shall:

- Ensure that all statutory inspections have been undertaken within their area of control and that remedial actions are completed within specified timeframes;
- Ensure that engineering works contracts are appropriately resourced in terms of health and safety requirements;
- Ensure that any contractors undertaking engineering works on Company properties have been selected and appointed in accordance with Company procedures.

App 2g: Estate and Building Managers, Shopping Centre, Leisure and Retail Outlet Managers
In addition to general responsibilities, these managers must:

Allow access and adequate time resource to any visiting enforcing authority, including cooperation in providing any requested information and documentation. The Group Head of Health, Safety and Security or his nominee must be advised of any outcomes of the visit;
Initiate the implementation of the business continuity plan in event of a major emergency and communicate appropriately through the management structure;

- Ensure that all risk assessments relating to the site are specific, suitable and sufficient and relevant persons informed of significant findings;
- Ensure that all events under such employee's control are managed safely and in accordance with the event management procedure. It is highly recommended that advice and assistance is sought from the nominated Health, Safety and Security Manager;
- Ensure that a current fire risk assessment is in place for areas under the Company's management. Should any physical changes to the building or any changes to processes occur ensure the assessment is reviewed by the Company appointed competent person;
- Ensure that emergency evacuation procedures are tested 6 monthly with the observations recorded and any issues raised actioned appropriately;
- Facilitate cooperation and coordination between tenants, visitors and contractors in relation to fire safety and health and safety matters to ensure effective control of the site;
- Monitor statutory requirements in relation to inspection and maintenance programmes for the building operation, including monitoring completion of remedial actions;
- Ensure that a current Asbestos Register, where relevant, is available on site and the location of any Asbestos Containing Materials is communicated to relevant parties;
- Ensure the effective implementation of the Water Management Plan for the site, including completion of the water log book records and close out of any actions raised from the Water Risk Assessment and periodic sampling;
- Ensure that access control systems are in place for contractors and that higher risk activities are controlled through the Permit to Work procedures.

Specific Roles

App 2h: Executive Director nominated as Board Director for Health, Safety and Security

The nominated Board Director with responsibility for Health, Safety and Security in addition to responsibilities to those of an Executive Director has the following role:

- Setting the Health, Safety and Security Policy and monitoring, through others, the levels of implementation of the policy throughout the Group;
- Formulating and chairing a Group Health, Safety and Security committee and reporting such matters to the main board annually or sooner if the circumstances warrant it. This could include an emergency Board meeting relating to health, safety and security matters;
- Setting realistic Health and Safety targets for the business units to maintain progressive improvement and continued standards of compliance of the relevant statutory provisions;
- Ensuring the appointment of a Group Head of Health, Safety and Security and that such person has suitable resources available within the Health, Safety and Security team to implement requirements and provide support the Group;
- Direct and liaise with the Group Head of Health, Safety and Security and business unit managing directors or their nominated representatives, on all health, safety and security matters relevant to the business needs.

App 2i: Group HR Director

The Group HR Director is accountable for all health and safety matters that will impact on the wellbeing and contract conditions of employees within their control and will:

- Be responsible through the Group Head of Health, Safety and Security for the health and safety of all the Company's employees;
- Effect the development and practical implementation of the Health and Safety at Work etc. Act 1974 and relevant legislation, together with the Company's Health and Safety Policy as it relates to employees' welfare, well-being and working conditions;
- Ensure that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of staff or others who may be affected by their activities;
- Ensure arrangements are in place for employee consultation and communication in accordance with the Health and Safety (Consultation with Employees) Regulations 1996;
- Advise the Executive Committee and the Director with responsibility for health, safety and security, on the interpretation and compliance of Health and Safety legislation as it affects employee conditions of contract;
- Ensure that there is an effective policy, organisation and arrangements for staff welfare and well-being provisions across the group with respect to occupational health and professional staff support schemes;
- Ensure for the provision of suitable arrangements and procedures for employee working conditions, including a group smoking policy, driving policy and guidance on safe home-working practices, etc.

App 2j: Group Head of Health, Safety and Security

The Group Head of Health, Safety and Security is responsible for:

- Providing professional health, safety and security advice to the Executive Committee and business units as necessary and assists the business unit managers with specific responsibility for health, safety and security in the planning and promotion of health, safety and security programmes, with the assistance of the Heads of Department and Health, Safety and Security Managers;
- Advising the Executive Director nominated as the Board Director for Health, Safety and Security on the interpretation and compliance with prime health, safety and security legislation and relevant health, safety and security codes of practice;
- Make provision for effective Health, Safety and Security committees across the Group;
- Make provision for a specific Counter Terrorism committee, made up of both internal and external stakeholders and report the findings to the Group Health, Safety and Security committees;
- Ensure that the Executive Directors are sufficiently aware of their duties and responsibilities through the provision of health and safety continuation training;
- Establish an allocation of responsibilities for the formulation of policy, development, planning and reviewing the standards of Health, Safety and Security within the Company, with such being discharged through the business unit Health, Safety and Security Managers;
- Establishing appropriate health, safety and security forums, with key members of the business units being represented, in order to foster a proactive health and safety culture;
- Assisting, through the business unit Health, Safety and Security Managers and business unit managers, where necessary, in the investigation of reportable accidents, incidents, occupational diseases and dangerous occurrences, and indeed any such loss that may be deemed to require further investigation, and provide advice to prevent a recurrence;
- Providing leadership in the development of the Company's health, safety and security culture, working towards a secure and an incident and injury free environment;
- Keeping up to date with changes to health and safety legislation, standards and good practices;
- Raising the Health, Safety and Security profile of the business across our industry sectors, setting the tone as a Client and Landlord.

Everyone has a legal responsibility in this area and can suffer personal liability in the event of a failure to follow safe, secure and healthy working practices.