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Global Reporting Initiative  
*Compliance Report 2013*



Our vision for the future

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## Who We Are and What We Do

The Berkeley Group is a residential-led property developer with a passion for creating successful, sustainable places. This begins with acquiring land in the right locations. We then develop schemes renowned for their design, public realm, transport, open space and access to employment and amenities - all the things that people look for in a place to live.

We operate in London and the South at a natural size, respecting the cyclical nature of property development. Our core brands are Berkeley, Berkeley First, St James, St George and St Edward, our joint venture with Prudential. We also have overseas sales desks in Hong Kong and Singapore.

The developments we create range in size from under twenty homes to complex mixed-use urban regeneration schemes with over four thousand homes. The types of homes we build include contemporary urban apartments, refurbished historic buildings and traditional family houses. Our mixed-use developments include offices, retail units, leisure facilities, hotels and restaurants.

We sell homes and commercial space to a broad range of customers: housing associations, universities, shared-ownership buyers, key workers, investors, private buyers and commercial occupiers.

The Berkeley Group is registered in the United Kingdom at Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG.

For more information on the company, including information on the subsidiary and joint venture companies and for details of our respective ownership in each of these, please see our [Annual Report and Accounts](#) and our [website](#).

## About This Document

This document supports our progress and performance in the area of sustainability during 2012/13, which is published in our [Annual Report and Accounts](#), in our [Vision2020 summary reports](#) and on our [website](#). This document is designed to help readers locate sustainability information relating to the Global Reporting Initiative, in order to provide comparability with other companies.

Our sustainability reporting provides a summary of the progress we have made against our Vision2020 framework, (our business strategy to deliver long-term, sustainable success), for the period from May 2012 to April 2013 and towards the second two-year cycle of our Vision2020 commitments, which run from May 2012 to April 2014. We provide readers with an overview of what Berkeley does and demonstrate how we comply with the Global Reporting Initiative (GRI) reporting criteria, through our management practices and Vision2020.

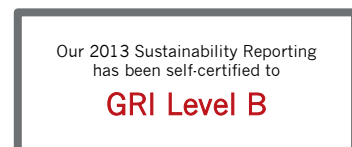
Berkeley uses the term 'sustainability' to describe how we manage the environmental, social and economic impacts of, and risks facing, our business in a responsible way. This applies to both the day-to-day management of our business and the developments that we build. Our reporting aims to present a transparent review of our sustainability performance to our stakeholders.

### Global Reporting Initiative

The Global Reporting Initiative (GRI) is the leading voluntary sustainability reporting standard, used by over 2,000 companies annually around the world to guide their sustainability reporting. This year we have benchmarked our sustainability report against the G3.1 edition of the GRI guidelines and the Construction and Real Estate Sector Supplement (CRESS). The GRI Framework sets out principles and indicators for measuring and reporting economic, environmental and social performance in a balanced and transparent manner.

### GRI Self-Certification

This year we are delighted to have self-certified our sustainability reporting to Level B of the Global Reporting Initiative (GRI) Sustainability Reporting Framework for the fourth year in a row. Our sustainability reporting content may be found in our [Annual Report and Accounts](#), in our [Vision2020 summary reports](#) and on our [website](#).



The following pages provide information regarding our compliance with the GRI: G3.1 CRESS guidelines.

## Applying the GRI guidance on defining report content and quality

The information in the table below demonstrates how we apply the GRI Reporting principles.

<p><b>Reliability &amp; Accuracy</b></p>	<ul style="list-style-type: none"> <li>● Validation of the majority of the information within our sustainability report is performed by our sustainability consultants, Jones Lang LaSalle. See the <a href="#">Advisor's Statement</a> from Jones Lang LaSalle for further details.</li> <li>● Guidance was provided by Jones Lang LaSalle on compliance with GRI.</li> <li>● Data assumptions and calculations are disclosed in data qualifying and methodological notes in the 2013 sustainability summary reports: <a href="#">Customers</a>, <a href="#">Homes</a>, <a href="#">Places</a>, <a href="#">Operations</a> and <a href="#">Our People</a>.</li> </ul>
<p><b>Comparability</b></p>	<ul style="list-style-type: none"> <li>● The historical performance data which forms the foundation of this report spans five years.</li> <li>● We participate in benchmarks, which provide a key vehicle through which we and our stakeholders are able to better understand our performance in comparison with that of our peers. These include the FTSE4 Good Index, NextGeneration Benchmark and the Carbon Disclosure Project (CDP).</li> <li>● We measure the performance of our developments using the Code for Sustainable Homes and BREEAM assessment methodologies. Our Vision2020 commitment is to achieved Code for Sustainable Homes Level 3 on all our new homes (which entered planning after April 2010) and for all our commercial units to achieve or be capable of achieving BREEAM 'Very Good'. We report our performance against these commitments annually.</li> <li>● We develop our report to comply with the GRI 3.1 CRESS guidelines.</li> </ul>
<p><b>Balance &amp; Clarity</b></p>	<ul style="list-style-type: none"> <li>● We have a clear 10 year framework for the business, encompassed in Vision2020.</li> <li>● Our Vision2020 summary reports are available online, while our Annual Report is available in both hard-copy and online. This allows us to reach a broad audience with differing accessibility needs.</li> <li>● Content is designed to be easily navigable to the reader and avoids complex technical jargon and excessive detail.</li> <li>● Disclosure of both negative and positive trends in performance is provided.</li> </ul>
<p><b>Sustainability Context</b></p>	<ul style="list-style-type: none"> <li>● Precautionary approach addressed through the use of a financial and environmental risk and opportunity assessment process, our materiality review and our evolving Vision2020 framework.</li> <li>● In 2010/11 we updated our materiality review to help us understand our key sustainability risks and opportunities, both now and looking ahead. The update included a review of: our key stakeholders and their perspectives on our Vision2020 framework, our sustainability policies and key policy updates.</li> <li>● Our Environmental Management System also ensures that the development process and our office operations take sufficient account of sustainability.</li> </ul>
<p><b>Stakeholder Inclusiveness</b></p>	<ul style="list-style-type: none"> <li>● The stakeholders to whom we consider ourselves accountable are explained on the <a href="#">stakeholder engagement page</a> of our website and are core to how we implement our Vision2020 framework.</li> </ul>
<p><b>Completeness &amp; Boundary Setting</b></p>	<ul style="list-style-type: none"> <li>● All of Berkeley's operations are included in the scope of this report as they all have sustainability impacts and are all under Berkeley's direct control. Our reporting also covers, where possible, those operations where we have an influence, e.g. our contractors. Any areas where we do not have complete data to report against all of our operations are indicated within the report.</li> <li>● Our reporting focuses on those issues that we consider most material to the running of our business, as captured within our Vision2020 framework. Additional information on our business and its financial performance, corporate governance, regulatory issues and directors' remuneration is provided in our <a href="#">Annual Report and Accounts</a>.</li> </ul>
<p><b>Timeliness</b></p>	<ul style="list-style-type: none"> <li>● The information presented in this report, the <a href="#">Vision2020 summary reports</a>, the <a href="#">Annual Report and Accounts</a> and the website was developed to reflect our performance during the financial year May 2012 – April 2013. This is the first year of our second two-year phase of Vision2020 commitments. The sustainability reporting schedule is aligned with the annual financial reporting schedule.</li> </ul>

# GRI Disclosures and Indicators

The profile disclosures and indicators are aligned with the GRI: G3.1 Construction and Real Estate Sector Supplement (GRI CRESS).

We have disclosed against each profile and management disclosure and fully or partially disclosed against the GRI indicators stated. This process allows us to self-certify our sustainability report to **Level B** of the GRI CRESS Sustainability Reporting Framework.

Our 2013 Sustainability Reporting  
has been self-certified to

**GRI Level B**

## Profile Disclosures

The disclosures below establish the context within which the Berkeley Group operates in order to provide an understanding of how our performance relates to this.

	Profile Disclosure	Cross Reference / Direct Answer
	<b>Strategy and Analysis</b>	
1.1	Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy.	<a href="#">Website – Our Progress 2012-13</a>
1.2	Description of key impacts, risks and opportunities	<a href="#">Website – Risks and Opportunities</a>
	<b>Organisational Profile</b>	
2.1	Name of the organisation	The Berkeley Group
2.2	Primary brands, products, and/or services.	GRI Compliance Report – Who we are and what we do, P2
2.3	Operational structure of the organisation, including main divisions, operating countries, subsidiaries, and joint ventures.	GRI Compliance Report – Who we are and what we do, P2
2.4	Location of organisation's headquarters.	The Berkeley Group Holdings plc., Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG
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.	The Berkeley Group operates primarily in England, with sales offices in both Hong Kong and Singapore.
2.6	Nature of ownership and legal form	<a href="#">Annual Report and Accounts</a>
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	GRI Compliance Report – Who we are and what we do, P2 <a href="#">Annual Report and Accounts</a>
2.8	Scale of the reporting organisation, including <ul style="list-style-type: none"> <li>● Number of employees;</li> <li>● Number of operations;</li> <li>● Net sales (for private sector organisations) or net revenues (for public sector);</li> <li>● Total capitalization broken down in terms of debt and equity</li> <li>● Quantity of products or services provided</li> </ul>	<a href="#">Annual Report and Accounts</a> <a href="#">Our People Summary Report</a>

	Profile Disclosure	Cross Reference / Direct Answer
2.9	<p>Significant changes during the reporting period regarding size, structure, or ownership including:</p> <ul style="list-style-type: none"> <li>• The location of, or changes in operations, including facility openings, closings, and expansions; and</li> <li>• Changes in the share capital structure and other capital formation, maintenance, and alteration operations</li> </ul>	<a href="#">Annual Report and Accounts</a>
2.10	Awards received in the reporting period	<a href="#">Website – External measures of success</a>
<b>Report Parameters</b>		
3.1	Reporting period for information provided	This report covers the period from May 2012 to April 2013, unless otherwise stated
3.2	Date of most recent previous report	The previous Sustainability Report was published in August 2012 (covering the period May 2011 – April 2012)
3.3	Reporting cycle	Published annually, to cover the financial year May – April
3.4	Contact point for questions regarding the report or its contents.	<a href="mailto:Sustainability@berkeleygroup.co.uk">Sustainability@berkeleygroup.co.uk</a>
3.5	<p>Process for defining report content, including:</p> <ul style="list-style-type: none"> <li>• Determining materiality;</li> <li>• Prioritizing topics within the report, and</li> <li>• Identifying stakeholders the organisation expects to use the report.</li> </ul>	<p>Website – Materiality</p> <p>Issues identified for reporting are aligned with the materiality assessment and with the priority issues addressed through Vision2020.</p> <p>Stakeholders who are expected to use the report are identified on the website – <a href="#">Stakeholder engagement</a>.</p>
3.6	Boundary of the report (e.g. countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).	GRI Compliance Report – About this document, P3
3.7	State any specific limitations on the scope or boundary of the report.	GRI Compliance Report – About this document, P4
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.	GRI Compliance Report – About this document, P4
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.	<a href="#">2013 Vision2020 Summary Reports</a>
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	<a href="#">2013 Vision2020 Summary Reports</a>
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	GRI Compliance Report – About this document, P3
3.12	Table identifying the location of the Standard Disclosures in the report.	GRI Compliance Report
3.13	Policy and current practice with regard to seeking external assurance for the report.	We do not currently have full external assurance for our sustainability reporting but our <a href="#">Advisor's Statement</a> can be found on our website.
<b>Governance, Commitments &amp; Engagement</b>		
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.	<a href="#">Website – Governance</a>

	Profile Disclosure	Cross Reference / Direct Answer
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).	<a href="#">Annual Report and Accounts</a>
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.	<a href="#">Annual Report and Accounts</a>
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	<a href="#">Annual Report and Accounts</a>
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance)	<a href="#">Annual Report and Accounts</a> describes the relationship between compensation for the Board and organisational performance.  There is currently no formal process to remunerate the Board or senior management on the basis of social and environmental performance alone.
<b>Governance, Commitments &amp; Engagement</b>		
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	<a href="#">Annual Report and Accounts</a>
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	When Board Members are appointed their expertise is taken into account on a case by case basis.
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.	Vision2020 sets out our key sustainability objectives related to our environmental, social and economic performance. The framework is fully embedded within the organisation. Vision2020 is supported by a number of <a href="#">policies</a> which can be viewed on our website.
4.9	Procedures of the highest governance body for overseeing the organisation'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.	<a href="#">Website – Governance</a>
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Judged by achievement of external awards and indicators (NextGeneration, FTSE4Good, Carbon Disclosure Project) and performance against publicly stated commitments which form part of our Vision2020 framework.
4.11	Explanation of whether and how the precautionary approach or principles is addressed by the organisation.	The precautionary approach has informed and is reflected in our Vision2020 framework, specifically when setting our objectives and commitments. The precautionary approach is also applied at a project level in respect of an assessment of each project against our sustainability commitments to ensure that they are met and no project provides a risk to the Group.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	<a href="#">Website – External measures of our success</a>
4.13	Membership in associations (such as industry associations) and/or national/international advocacy organisations in which the	We have a Vision2020 commitment related to sharing experiences with Government and the rest of the industry through representation at steering



	Profile Disclosure	Cross Reference / Direct Answer
	<p>organisation:</p> <ul style="list-style-type: none"> <li>● has positions in governance bodies;</li> <li>● participates in projects or committees;</li> <li>● provides substantive funding beyond routine membership dues; or</li> <li>● Views membership as strategic.</li> </ul>	<p>groups and events. Progress against this commitment has been reported on our website, which provides details of organisations which we are members of.</p> <p><a href="#">Website – Progress 2012-13</a></p>
4.14	List of stakeholder groups engaged by the organisation	<a href="#">Website – Stakeholder Engagement</a>
4.15	Basis for identification and selection of stakeholders with whom to engage	<a href="#">Website – Stakeholder Engagement</a>
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	<a href="#">Website – Stakeholder Engagement</a>
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	<p><a href="#">Website – Stakeholder Engagement</a></p> <p>Our stakeholders concerns were incorporated into the results of our Materiality Review.</p> <p><a href="#">Website – Materiality</a></p>

## Management Approach Disclosures

The disclosures below provide a brief overview of our management approach to each of the aspects identified in order to provide some context for the performance indicators in the following table.

Aspect	GRI Requirements	Response
<b>ECONOMIC MANAGEMENT APPROACH</b>		
<b>&gt; Economic</b>		
<b>Economic Performance</b>	Policies and practices for assessing, addressing and managing corporate, operational, regulatory and strategic risk that might impact financial performance.	A summary of our approach to corporate risk management is available in our <a href="#">Annual Report and Accounts, p52-53</a> . Our approach to managing sustainability risks, and their associated financial impacts, are available on our <a href="#">website</a> .
	Policies and practices for mitigating economic risks.	A detailed summary of our approach to mitigating economic risks is available in our <a href="#">Annual Report and Accounts, p52-53</a> .
	Policies and practices regarding maintenance and capital expenditure in plant equipment or property.	<p>We have a team of property managers who manage all maintenance issues with the rental properties. There is a specific telephone line for the tenants to call if they have a problem and also a separate number should there be an emergency out of office hours. All matters are reported to the property management team. If it is a defect then the matter is referred to the developer for resolution under the 2 year warranty. If it is a maintenance issue then a relevant contractor is instructed and the matter is managed through the property management team. All maintenance contractors are checked for H&amp;S and insurance prior to being put on our preferred suppliers list.</p> <p>All work is either checked personally, through photos from the contractor or by checking with the tenant. The type of check depends on the level of work required.</p> <p>The team also carry out routine preventative maintenance such as boiler services and gas safety checks. In addition, all properties are routinely inspected at least once a year by a member of the property management team. Any issues are noted and dealt with accordingly.</p>
<b>Market Presence</b>	Policies and practices regarding the maintenance of market presence including the communication of product and brand.	We perform targeted customer engagement annually to ensure we fully understand our customer's needs. This informs our marketing and communications strategy. We maintain our marketing presence through our website, brochures, annual report and accounts, sustainability report, site hoardings and development marketing materials.
<b>Indirect Economic Impacts</b>	Policies and practices to encourage positive, and minimize negative, economic legacy impacts from activities.	Our Vision2020 framework ensures we carefully manage the economic, environmental and social legacy impacts of our activities.
	Policies and practices to measure economic legacy impacts.	See our <a href="#">Sustainability Policy</a> and our <a href="#">Places Summary Report</a>
<b>Goals and Performance</b>	Organisation-wide goals regarding performance related to the Economic Aspects.	Our economic goals are all incorporated within our Vision2020 framework and may also be found within our <a href="#">Annual Report and Accounts</a> .
<b>Policy</b>	Organisation-wide policy (or policies) that define the organisation's overall commitment related to Economic Aspects.	Our approach to growing our business is incorporated within our Vision2020 framework and also covered in our <a href="#">Annual Report and Accounts</a> .
<b>Additional</b>	Additional relevant information required to	See <a href="#">Annual Report and Accounts</a>

Aspect	GRI Requirements	Response
Contextual Information	understand organisational performance.	

Aspect	GRI Requirements	Response
<b>ENVIRONMENTAL MANAGEMENT APPROACH</b>		
<b>&gt; Environmental</b>		
<b>Materials</b>	Policy and practices to reduce and optimise raw material extraction purchased for direct use.	The Operations focus area of our Vision2020 framework includes commitments to sustainable procurement. These are supported by our <b>Sustainable Procurement Policy</b> which ensures that we select suppliers that reduce and optimise their environmental impacts, from extraction through to transportation of materials to sites.
	Policy and practices for selecting materials and engaging suppliers, including specifications for certifications, or utilization of preferred or prescribed lists of products and materials.	Our <b>Sustainable Procurement Policy</b> specifies our material selection processes and sets out certification requirements (e.g. FSC timber). These practices are driven through the Operations focus area of our Vision2020 framework.
<b>Energy</b>	Policy and practices on energy management through all relevant stages of the life cycle.	Through Vision2020, we manage and reduce energy consumption throughout the product lifecycle – from design through to construction and business operations. During design, energy consumption is managed through our commitment to the Code for Sustainable Homes. The Operations focus area of Vision2020 includes commitments to reduce site and office energy consumption. These efforts are supported by our documented Environmental Management System (aligned to ISO 14001).
<b>Water</b>	Policy and practices on water use management through all relevant stages of the life cycle.	Through Vision2020 we focus on reducing water use throughout our business lifecycle. We have a commitment to reducing site water consumption of our operations as part of our Operations focus area. The water footprint of our product is reduced through our Homes commitment to the Code for Sustainable Homes. These efforts are supported by our documented Environmental Management System.
	Policy and practices on the management of water quality through all relevant stages of the lifecycle.	Water quality on construction sites is managed through the Operations focus area of our Vision2020 framework. These efforts are supported through the assessments performed as part of our documented Environmental Management System.
	Policy and practices on drainage and discharge of water.	Climate change risks (including flooding) are managed within the Homes focus area of Vision2020. Climate change adaptation commitments may be found within our Places focus area. Our documented Environmental Management System also addresses the drainage and discharge of water on construction sites. We also comply with all regulations in this area, including the Flood and Water Management Act 2010.

Aspect	GRI Requirements	Response
<b>Biodiversity</b>	Policy and practices on mitigation of adverse biodiversity impacts including, among others, new construction and management activities.	We mitigate adverse biodiversity impacts through the planning process and our Vision2020 commitment to employ an ecologist on all developments. Our documented Environmental Management System mitigates adverse biodiversity impacts during construction.
	Policy and practices on avoiding selection of biologically diverse sites.	Historically, the majority of our developments have been on brownfield land (see our <a href="#">Places Summary Report</a> ). Where possible we endeavour to purchase brownfield land. The nature of our business supports this through its focus on urban redevelopment.
<b>Emissions, Effluents and Waste</b>	Policy on carbon management, including policy position on carbon offsetting.	We monitor the carbon emissions of all our sites through quarterly reporting of energy data for each office, site and sales & marketing suites. We have a commitment to reduce the carbon emissions of our sites and offices and our commitment to Code for Sustainable Homes ensures we manage the carbon footprint of our product. Our <a href="#">Sustainability Policy</a> and documented Environmental Management System also address this.
	Policy and practices that promote waste avoidance as the first step in the waste hierarchy.	Our Vision2020 commitment to the Code for Sustainable Homes reduces waste in product design. Our documented Environmental Management System addresses this on site and outlines how the waste hierarchy should be employed. Every site also compiles a Site Waste Management Plan and complies with all UK regulations in this area. See the <a href="#">Operations</a> pages of our website for further detail.
	Policy and practices on reducing fugitive emissions.	Our <a href="#">Sustainability Policy</a> and documented Environmental Management System address this, ensuring we monitor and manage fugitive emissions (including dust).
<b>Land Degradation, Contamination and Remediation</b>	Policy on planning for, and/or managing, land assessment and remediation.	Our land purchase risk assessment is completed during the pre-acquisition process and ensures that land contamination is identified at this stage. Contaminated land surveys area also conducted during the land acquisition process.
	Policy on management and/or remediation of contamination or harmful materials such as asbestos, lead, chromium, mercury and manmade mineral fibres.	Our Health and Safety Management System (aligned to OHSAS 18001) and Environmental Management System ensure the careful management, handling and disposal of any hazardous substances. Furthermore, we comply with all regulations in this area.
	Policy and practices to identify risk of contamination and the containment or remediation strategies deployed.	Before we start on any site, we perform pre-start risk assessments as part of our Health and Safety Management System. Furthermore, we comply with all regulations in this area.

Aspect	GRI Requirements	Response
<b>Products and Services</b>	Policies and practices to mitigate environmental and end user human health impacts during all stages of the lifecycle.	We mitigate environmental and end user human health impacts at all stages of our lifecycle through our <b>Health and Safety Policy</b> and our Health and Safety Management System. We also have a commitment to monitor the indoor air quality at a completed home and use the findings to influence future design and are trialling this with monitoring equipment at Woodberry Park.
<b>Compliance</b>	Policies and practices that ensure environmental management requirements are complied with.	Our compliance with environmental management requirements is monitored through our environmental and health and safety audits as part of our Environmental Management System and Health and Safety Management System and by the UK Environment Agency.
<b>Transport</b>	Policy and practices to avoid or reduce transport of materials and people to and from assets.	Through our Vision2020 framework we focus on reducing transport requirements at all stages of our lifecycle. Within our Homes action area, we have a commitment to provide home-working facilities for all our homes. As part of our <b>Sustainable Procurement policy</b> we have included requirements for the selection of local materials where possible. Our documented Environmental Management System also addresses this.
	Policy and practices to promote more sustainable transport to and from assets.	The use of sustainable transport is carefully planned on most of our developments using green travel plans. On some sites we have performed a trial to track supplier transport movements to try and understand the scale of their impact. These efforts are further supported by our documented Environmental Management System.
	Policy and practices on the management of transport impacts during construction.	On one site we have performed a trial to track supplier transport movements to try and understand the scale of their impact. These efforts are further supported by our documented Environmental Management System.
<b>Overall Approach</b>	Policies and practices on environmental management.	We have a <b>Sustainability Policy</b> and Environmental Management System, which we use to monitor and manage our environmental impacts.
<b>Goals and Performance</b>	Organisation-wide goals regarding performance related to the Environment Aspects.	Our environmental performance goals are all incorporated within our Vision2020 framework.
<b>Policy</b>	Organisation-wide policy (or policies) that define the organisation's overall commitment related to environmental aspects.	Our approach to the environment is incorporated within our Vision2020 framework and also covered by our <b>Sustainability Policy</b> .
<b>Organisational Responsibility</b>	The most senior position with operational responsibility for environmental aspects (or senior level governance structure).	Karl Whiteman, Director in Charge of Sustainability
<b>Training and Awareness</b>	Procedures related to training and raising awareness in relation to environmental aspects.	We have a commitment to provide all direct employees with an individual sustainability training assessment and allocate training based on their job role/function. Further information is available in the Our <b>People Summary Report</b> .
<b>Monitoring and Follow-up</b>	Procedures related to monitoring environmental management and corrective and preventative actions, including those related to the supply chain.	Our Environmental Management System and Health and Safety Management System ensure that we monitor environmental management and corrective and preventative actions.

Aspect	GRI Requirements	Response
<b>Additional Contextual Information</b>	Additional relevant information required to understand organisational performance.	See the <a href="#">Vision2020</a> page of our website.
<b>SOCIAL MANAGEMENT APPROACH</b>		
<b>&gt; Labour Practices and Decent Work</b>		
<b>Employment</b>	Policy and practices on outsourcing of work to contractors and subcontractors and recruitment of employees and supervised workers.	We have an <a href="#">Equal Opportunities policy</a> that covers the recruitment of employees and supervised workers. All subcontractors are asked to comply with our <a href="#">Sustainable Procurement policy</a> , which includes requirements for the prioritisation of local goods and services.
	Policy for increasing direct contribution to overall economic development and improvements for the workforce (local and national).	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
	Policy and practices on employment of daily workers and casual workers who are employed without a formal (written) contract.	We do not have any policies or practices on the employment of daily or casual workers.
	Policy regarding costs and logistics for the return of foreign workers to their place of origin.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
	Policy on worker accommodation and amenities provision (where necessary), and the organisational responsibility for this provision.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
<b>Labour / Management Relations</b>	Policies and practices related to labour and management relations	We have a <a href="#">Business Ethics policy</a> and a <a href="#">Whistle Blowing policy</a> to support good labour management practices.

Aspect	GRI Requirements	Response
<b>Occupational Health and Safety</b>	Policy and procedures for the procurement, transport, handling, use and disposal of all hazardous materials.	This is dealt with through our Health and Safety Management System and Environmental Management System.
	Policy and procedures for assisting employees with mental health issues, substance and alcohol addiction, and HIV / AIDS.	We do not currently have a documented approach in this area, however, we are in the process of establishing a Health & Wellbeing programme which will take effect in 2013/14; this includes a commitment to provide an Employee Assistance Programme.
	Policy on compensation and benefits for employees for work-related injuries or fatalities.	We do not have any policies or practices on compensation and benefits for employees for work-related injuries or fatalities.
	Policies and procedures for the commissioning, operation and decommissioning of equipment.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
	Policies and procedures with regard to the provision of health and safety requirements in agreements for contractors and subcontractors.	In order to be approved on our supplier database all contractors must agree to our Health and Safety Management rules. These form part of our Health and Safety Management System. They are supported by further project-specific contractual requirements.
	Policies and procedures requiring pre-qualification of suppliers and contractors relating to health and safety, and including the existence of formal agreements and health and safety due diligence for new projects and investments.	In order to be approved on our supplier database all contractors must agree to our Health and Safety Management rules. In 2012-13 we developed a new Code of Practice for Temporary Workers and also updated our Health and Safety Call-Off questionnaire. These form part of our Health and Safety Management System.
<b>Training and Education</b>	Explain the context in terms of skills level available for key areas of activity and shortages of skills/competencies in certain high risk roles, jobs and locations.	We are aware of potential skills shortages in the UK relating to sustainable construction. To help up-skill our direct staff, each employee is provided with health and safety and sustainability training. Our <b>Apprenticeships and Skills Development Policy</b> seeks to address skills shortages by providing training and development opportunities. We are also developing a Job Creation Programme to get 250 unemployed into work.
	Policies and programs for re-employability after a project has ended, or after any occupational disability has occurred.	We do not have a policy or programme on re-employability after a project has ended, or after any occupational disability has occurred.

Aspect	GRI Requirements	Response
<b>Diversity and Equal Opportunity</b>	Policy on gender equality including how gender is incorporated into procurement policy and plans.	We have an <b>Equal Opportunities Policy</b> which covers gender equality for contractors and direct employees. All employees are provided with this policy.
	Policies and practices regarding gender equality in the workplace.	We have an <b>Equal Opportunities Policy</b> which covers gender equality. All employees are provided with this policy.
	Policies and practices regarding gender equality in the community.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
	Policies and practices regarding gender equality in relation to customers.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
	Policies and practices regarding gender equality in relation to investment.	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
<b>Equal Remuneration for Men and Women</b>	Policies and practices regarding equal remuneration for men and women	Our staff remuneration is based on merit, not gender.
<b>Goals and Performance</b>	Organisation-wide goals regarding performance related to the Labour Aspects, indicating their linkage to internationally recognised standards	Our labour-related performance goals are all incorporated within our Vision2020 framework.
<b>Policy</b>	Organisation-wide policy (or policies) that define the organisation's overall commitment related to labour aspects	Our approach to labour aspects is incorporated within our Vision2020 strategy and also covered by our <b>Business Ethics</b> and <b>Equal Opportunities policies</b> covering Labour Aspects.
<b>Organisational Responsibility</b>	The most senior position with operational responsibility for labour aspects (or senior level governance structure)	Responsibility rests with divisional Managing Directors.
<b>Training and Awareness</b>	Procedures related to training and raising awareness in relation to labour aspects	The <b>Equal Opportunities Policy</b> is provided to all employees on joining the company. This outlines our approach to managing labour relations.
<b>Monitoring and Follow-up</b>	Procedures related to monitoring labour management and corrective and preventative actions, including those related to the supply chain.	Our <b>Business Ethics</b> and <b>Whistle Blowing policies</b> cover labour management, including the supply chain and identify corrective and preventative actions.
<b>Additional Contextual Information</b>	Additional relevant information required to understand organisational performance	See the <b>Vision2020</b> page of our website.
<b>&gt; Human Rights</b>		
<b>Investment and Procurement Practices</b>	Policy and criteria for the screening of contractors and sub-contractors.	See GRI Compliance Report, (GRI Indicator HR2).
	Practices to monitor (e.g. audits) and train employees and contractors in compliance with labour and international human rights standards (including enforcement).	We have no practices to monitor or train employees and contractors with regard to labour and international human rights standards. We comply with all UK legislation in relation to human rights.



Aspect	GRI Requirements	Response
<b>Non-discrimination</b>	Policies and practices for recruitment and career development to avoid discrimination.	Our <b>Equal Opportunities Policy</b> ensures that our recruitment process is devoid of discrimination.
<b>Freedom of Association and Collective Bargaining</b>	Policy and procedures on freedom of association and collective bargaining	We do not have any specific policies or procedures related to freedom of association and collective bargaining.
<b>Child Labour</b>	Policy and practices for screening and monitoring of child labour risks by contractors and subcontractors in all stages of the lifecycle (including construction materials).	We comply with all regulations in this area.
	Practices in regards to workers' children.	We have no practices in this area. Any issues where our employees require support for the care of their children are dealt with on a case by case basis.
<b>Prevention of Forced and Compulsory Labour</b>	Policies and practices on the prevention of forced and compulsory labour	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
<b>Security Practices</b>	Describe awareness raising and training provided to security personnel, in relation to respect and dignity and human rights	We outsource security on our sites. It is a standard expectation that our sub-contractors are trained in relation to respect, dignity and human rights.
<b>Indigenous Rights</b>	Policies and practices on indigenous rights	This is not deemed a material issue for The Berkeley Group and therefore we have no policies or practices relating to this issue.
<b>Assessment and Remediation</b>	Policies and practices on human rights assessment and remediation	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Goals and Performance</b>	Organisation-wide goals regarding performance relevant to the human rights aspects	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Policy</b>	Organisation-wide policy or policies that define overall commitment to human rights aspects	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Organisational Risk Assessment</b>	Describe risk assessment procedures that include human rights	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Impact Assessment</b>	Processes and procedures for assessing, reviewing or tracking human rights impacts	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Organisational Responsibility</b>	The most senior position with operational responsibility for human rights (or senior level governance structure)	Responsibility rests with divisional Managing Directors.
<b>Training and Awareness</b>	Procedures related to training and raising awareness in relation to human rights	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>Monitoring, Follow-up and Remediation</b>	Procedures related to monitoring human rights management and corrective and preventative actions, including those related to the supply chain	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.

Aspect	GRI Requirements	Response
<b>Additional Contextual Information</b>	Additional relevant information required to understand organisational performance	Human rights are dealt with through legislation in the UK. This is the only market in which we operate.
<b>&gt; Society</b>		
<b>Local</b>	Policies and practices to manage impacts on	The planning process ensures we carefully manage our

Aspect	GRI Requirements	Response
<b>Communities</b>	local communities	impact on local communities. This is supported by our Community Engagement Strategy and our commitment to the Considerate Constructors Scheme during construction. We are also rolling out our social sustainability metrics to help us understand and manage the impacts we have on local communities.
<b>Corruption</b>	Policies and practices to mitigate corruption risks, within the reporting organisation and/or the supply chain.	Our <b>Business Ethics, Whistle Blowing</b> and <b>Sustainable Procurement policies</b> outline how we manage any corruption risks within our business and supply chain.
	Policy or screening process in place to mitigate incidents of money laundering, bribery and corruption through real estate valuations and transactions.	Our <b>Business Ethics</b> and <b>Sustainable Procurement policies</b> mitigate money laundering, bribery and corruption issues.
<b>Public Policy</b>	Policy or procedure for managing the impact of the organisation on the community.	We engage with communities during the planning process using our best practice community consultation guidelines. These ensure we carefully manage the impact of our organisation on the community. See our <b>Sustainability Policy</b> and our <b>Places Summary Report</b> for further details.
<b>Anti-Competitive Behaviour</b>	Policies and procedures to identify and avoid anti-competitive behaviour, within the reporting organisation and/or the supply chain.	Our <b>Business Ethics Policy</b> ensures we are able to identify and avoid anti-competitive behaviour.
<b>Compliance</b>	Procedures to ensure we comply with policies and practices regarding our impact on local communities and society.	We comply with all UK regulations in this area and all local planning requirements.
<b>Goals and Performance</b>	Organisation-wide goals regarding performance relevant to the society aspects	Our approach to society is incorporated within the Places focus area of our Vision2020 framework
<b>Policy</b>	Organisation-wide policy or policies that define overall commitment to society aspects	Our <b>Sustainability Policy</b> outlines our commitment to society, which is reflected in the Places focus area of our Vision2020 framework.
<b>Organisational Responsibility</b>	The most senior position with operational responsibility for society aspects (or senior level governance structure)	Karl Whiteman, Director in Charge of Sustainability
<b>Training and Awareness</b>	Procedures related to training and raising awareness in relation to society aspects	We have a commitment to provide all direct employees with an individual sustainability training assessment and allocate training based on their job role/function and will be rolling this out in 2013/14.
<b>Monitoring, Follow-up and Remediation</b>	Procedures related to monitoring society aspects management and corrective and preventative actions, including those related to the supply chain	Our best practice community consultation guidelines and our commitments within the Places focus area of Vision2020 set the procedures for managing our society aspects. We also collect feedback through post-occupancy monitoring which is incorporated into our new developments.
<b>Additional Contextual Information</b>	Additional relevant information required to understand organisational performance	See the <b>Vision2020, Places page</b> of our website

Aspect	GRI Requirements	Response
<b>&gt; Product Responsibility</b>		
<b>Customer Health and Safety</b>	Policies, practices and training relating to end user health, safety and security during all stages of the lifecycle.	All our homes comply with UK regulations; are designed to meet Disabled Discrimination Act requirements; are designed in consultation with an Architectural Liaison Officer /Crime Prevention Design Advisor; fulfil the requirements of our Health and Safety Management System; and provide home-user manuals which include full details on health, safety and security.
<b>Product and Service Labelling</b>	Policies with respect to the application of voluntary and mandatory sustainable building standards, certification, rating and labelling schemes.	We have a commitment to achieve Level 3 of the Code for Sustainable Homes on all new developments as part of our Vision2020 strategy. We have also committed to ensure that all our commercial units achieve BREEAM Very Good or are capable of achieving BREEAM Very Good, if the fit-out is undertaken by the tenant.
	Practices with regards to customer surveys.	We perform two customer surveys each year. The first survey is performed on 100% of customers six weeks after completion to understand customer satisfaction. This includes a sustainability question. Results may be found in our <a href="#">Customers Summary Report</a> . We are also planning to survey 25% of purchasers in 2013-14 to understand their sustainability preferences.
<b>Marketing Communications</b>	Policies and practices for marketing and communications for products	Our approach to marketing and communication of our products is set out within our <a href="#">Customers Summary Report</a> .
<b>Customer Privacy</b>	Policies and practices for ensuring customer privacy (related to data protection)	When providing us with their details, all customers have the opportunity to specify whether they wish to allow us to share their details with third parties in accordance with the UK Data Protection Act.
<b>Compliance</b>	Policies and practices on product responsibility compliance	Our Vision2020 framework covers all areas of our product responsibility. We audit our processes and performance against this framework annually.
<b>Goals and Performance</b>	Organisation-wide goals regarding performance relevant to product responsibility	Our approach to product responsibility is incorporated within the Homes focus area of our Vision2020 framework.
<b>Policy</b>	Organisation-wide policy or policies that define overall commitment product responsibility	Our organisational approach to product responsibility is incorporated within the Homes focus area of our Vision2020 framework and established in our <a href="#">Climate Change Policy</a> .
<b>Organisational Responsibility</b>	The most senior position with operational responsibility for product responsibility aspects (or senior level governance structure)	Responsibility rests with divisional Managing Directors
<b>Training and Awareness</b>	Procedures related to training and raising awareness in relation to product responsibility aspects	We have a commitment to provide all direct employees with an individual sustainability training assessment and allocate training based on their job role/function.

Aspect	GRI Requirements	Response
<b>Monitoring and Follow-up</b>	Procedures related to monitoring product responsibility aspects management and corrective and preventative actions, including those related to the supply chain	All our completed units are checked and certified by a Code for Sustainable Homes or BREEAM qualified assessor to ensure compliance.
<b>Additional Contextual Information</b>	Additional relevant information required to understand organisational performance	See the Vision2020, <a href="#">Homes</a> and <a href="#">Places</a> pages of our website.

## GRI Performance Indicators

All performance indicators are published in either our 2012 Sustainability Summary Report, our 2012 Performance Report, our website or directly in this report.

GRI Performance Indicator		Response	Disclosure
<b>Economic Development (EC)</b>			
<b>EC1</b>	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.	Annual Report and Accounts 'Places' and 'Our People' summary reports	Partial
<b>EC2</b>	Financial implications and other risks and opportunities for the organisation's activities due to climate change.	Sustainability summary reports Website – Key sustainability risks and opportunities	Partial
<b>EC4</b>	Significant financial assistance received from government.	None	Full
<b>EC6</b>	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Website – Sustainable Procurement Policy 'Operations' summary report	Partial
<b>EC8</b>	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	Economic impact assessment 'Places' summary report	Partial
<b>EC9</b>	Understanding and describing significant indirect economic impacts, including the extent of impacts.	Economic Impact Assessment	Full
<b>Environmental (EN)</b>			
<b>EN3</b>	Direct energy consumption by primary energy source.	'Operations' summary report	Full
<b>EN4</b>	Indirect energy consumption by primary source.	'Operations' summary report	Full
<b>CRE1</b>	Building energy intensity	'Operations' summary report	Full
<b>EN6</b>	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	'Homes', 'Places' and 'Operations' summary reports	Full
<b>EN7</b>	Initiatives to reduce indirect energy consumption and reductions achieved.	'Operations' summary report	Partial
<b>EN8</b>	Total water withdrawal by source.	'Operations' summary report	Full
<b>CRE2</b>	Building water intensity	'Operations' summary report	Full
<b>EN12</b>	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	'Places' summary report	Partial
<b>EN14</b>	Strategies, current actions, and future plans for managing impacts on biodiversity.	'Places' summary report	Partial
<b>EN16</b>	Total direct and indirect greenhouse gas emissions by weight.	'Operations' summary report	Full
<b>EN17</b>	Other relevant indirect greenhouse gas emissions by weight.	'Operations' summary report	Full
<b>CRE3</b>	Greenhouse gas intensity from building energy (kg CO <sub>2</sub> e / m <sup>2</sup> / year)	'Operations' summary report	Full
<b>CRE4</b>	Greenhouse gas emissions intensity from new construction and redevelopment activity.	'Operations' summary report	Full
<b>EN22</b>	Waste by type and disposal method.	'Operations' summary report	Full
<b>EN23</b>	Total number and volume of significant spills.	'Operations' summary report	Full

GRI Performance Indicator		Response	Disclosure
EN26	Initiatives to enhance efficiency and mitigate environmental impacts of products and services, and extent of impact mitigation.	'Operations', 'Homes and 'Places' summary reports	Partial
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	'Operations' summary report	Partial
<b>Labour Practices and Decent Work (LA)</b>			
LA2	Total number and rate of employee turnover by age group, gender, and region.	'Our People' summary report	Full
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant location of operation.	Benefits provided to our full time employees for all of our operations are: health care to senior staff, eye tests for all staff, life insurance to all staff, disability/invalidity coverage to some senior staff, maternity/paternity leave, retirement provision to all staff, stock ownership to senior directors.	Full
LA7	Rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities by region.	'Our People' summary report	Partial
CRE6	Percentage of the organisation operating in verified compliance with an internationally recognised health and safety management system.	'Our People' summary report Website: Health and Safety	Full
LA10	Average hours of training per year per employee by employee category.	'Our People' summary report	Partial
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Website Annual Report and Accounts 'Our People' summary report	Partial
<b>Product Responsibility (PR)</b>			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	All stages of the product lifecycle are analysed for health and safety using CDM practices. This includes new construction, management, development and redevelopment. Additionally, health and safety audits are conducted at all of our construction sites.	Partial
CRE8	Type and number of sustainability certification, rating or labelling schemes for new construction, management, occupation and redevelopment.	'Homes and 'Places' summary reports	Full
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	'Customers' summary report	Full
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	'Customers' summary report Website – Customer Care	Partial
<b>Society Performance (SO)</b>			
SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	'Places' summary report	Full

GRI Performance Indicator		Response	Disclosure
<b>S02</b>	Percentage and total number of business units analysed for risks related to corruption.	All business units – see <a href="#">Annual Report and Accounts</a> <a href="#">Website – Whistle Blowing Policy</a> <a href="#">Website – Business Ethics Policy</a>	Full
<b>S05</b>	Public policy positions and participation in public policy development and lobbying.	The Vision2020 framework and sustainability policies do not differ from any public policy positions taken.	Partial
<b>Human Rights (HR)</b>			
<b>HR1</b>	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	We do not work or invest in regions where human rights are a concern as our development activities are all based in the UK, and predominantly in the South of England. Therefore, this is not an investment risk and our investment agreements do not include specific clauses on human rights or undergo human rights screening.	Full
<b>HR2</b>	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	All our contractors and suppliers are required to comply with the Sustainable Procurement Policy which is incorporated within the Berkeley Group Management Rules, under which all our contractors are contracted. For those goods and services being sourced from developing countries, we expect suppliers to demonstrate that minimum supply chain labour standards have been met. This policy states that we use the Ethical Trading Initiative (ETI) Base Code and the standards adopted by the UN through the Universal Declaration of Human Rights, and the ILO conventions.  Based on our total spend on suppliers and contractors, materials that are associated with a human rights risk would be insignificant as a proportion of this spend, but we recognise the importance of this issue and have monitored compliance on a case-by-case basis. Where we feel specific materials could have human rights issues associated with them, we have sought more detailed information from suppliers on the management of human rights issues.	Full

## Contact us

If you have any feedback or further questions about this report please contact [sustainability@berkeleygroup.co.uk](mailto:sustainability@berkeleygroup.co.uk)

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