

Code of Conduct

Working together at Landsec



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Introduction

Landsec's Code of Conduct is not just about policies. It's about the way we behave every day. It's about the way we treat our customers, both internally and externally. And it's about the way we live our values. We want to ensure our people have the guidance they need to make the right decisions.

It sets out what we expect of you, and what you can expect of us.

At Landsec, everything is experience and every experience we create is built on our values.

We:

- are customer-centric.
- show respect.
- have integrity.
- always excel.
- strive to innovate.
- are accountable.

Our values are there to be lived, and each time we put them into action we give them meaning – strengthening our business, shaping every experience.



Robert Noel | Chief Executive



01.

Staying compliant

Making sure we comply with the law, and protect Landsec's reputation.





Delegation of authority

At Landsec, we want to empower our people to make the right decisions for their customers, but it's important that certain decisions are only signed off by those with authority to do so.

Landsec's delegation of authority guidance explains who is authorised to make decisions at Landsec.

It tells you the process we follow when we decide who to delegate authority to, and it explains who's empowered to make decisions on a range of things; from group budgets and communication projects, to recruitment, expense claims, and more.



GDPR data protection policy

Landsec's approach to managing personal data, from how we collect it to when we should destroy it, is set out in our **GDPR Data Protection policy**. Don't forget it's everyone's responsibility to ensure we are handling data in line with GDPR policy.



Anti-bribery/ gifts & hospitality policy

This policy helps you do the right thing when deciding whether you can give or accept **gifts or hospitality** when you work for Landsec.

It tells you what you need to consider before you accept or offer somebody a gift or hospitality, both as an individual and collectively as a team. It also explains how and when you need to seek approval to register it in the 'Gifts & Hospitality Log'.





Prevention of Tax Evasion

Did you know that it's not just an offence to evade tax, it's also an offence if you fail to prevent tax evasion?

What this means for Landsec is that we would be liable if any of our employees were to intentionally aid tax evasion by others – for example, by making cash in hand payments to sole traders who don't declare the income to HMRC.

So, we follow **procedures** as a business to help us assess the risk of that happening and if it is.



Procurement Strategy

Landsec always seeks to source goods and services efficiently and fairly, and to get the best possible value for money. That's why it's important **you know when purchases need to go to tender, how to propose a new supplier, and what the approval processes are.**

It also helps ensure our supply chain is living our values too.



Securities Dealing Policy

This policy tells you what you can and can't do when it comes to trading in Landsec shares.

For example, while you're employed by Landsec, you can't buy or sell Landsec shares during certain "closed periods" – the six weeks before our full year results in May and the six weeks before our interim results November.

The Securities Dealing Policy has been designed to ensure that you do not misuse, or place yourself under suspicion of misusing, information about the business which you have that is not public.

Travel and Expenses Policy

It's important you know and understand how to claim for appropriate travel and business expenditure. By following the [Travel and Expenses Policy](#), we can ensure we comply with tax and other legal obligations.



02.

Personal conduct

Helping us be Landsec ambassadors.





Dress code

When it comes to what to wear at work, we respect your judgment and trust you to wear the right clothes for your work situation. Formal business wear will often be the norm for client meetings. It's equally acceptable to dress in a less formal way when you're not meeting customers.

Please keep it smart and sensible; no ripped jeans, shorts, t-shirts or unsafe footwear such as flip-flops. Please remember that you're representing the company at all times.



Harassment and Bullying Policy and Procedure

Landsec is committed to stopping and preventing any behaviour that's causing offence or distress in the workplace.

We take complaints of **bullying or harassment** very seriously, and will investigate them promptly, efficiently and in confidence, in accordance with our policy.



Whistleblowing

Landsec prides itself on having the climate and opportunity for employees to voice genuinely-held concerns about unethical behaviour or decisions. That's why we have a robust and detailed **Whistleblowing Procedure**, including a phone number and email address to report concerns anonymously.





Alcohol and Substance or Drug Abuse Policy

This policy is designed to protect employees and the business from the **abuse of alcohol and drugs**. It balances respect for individual privacy with the need to maintain a safe, secure and productive environment.

It defines your responsibilities as an employee or manager when it comes to drink and drugs. It tells you what's acceptable and what isn't – particularly during the festive season.





Equal Opportunities Policy

Landsec is an equal opportunities employer. That means we recruit and select people fairly without discrimination. If you're a manager, it's particularly important to familiarise yourself with our **Equal Opportunities Policy** to ensure you are up to date with best practice in recruitment and development.



Disciplinary and Grievance Procedures

Our **Disciplinary Procedures** tell you what to expect when Landsec deals with a disciplinary matter.

It's there so we have a fair, consistent and effective process for dealing with disciplinary matters. The policy will be applied where we need to take formal action to help an employee to meet appropriate standards of conduct, performance and attendance.

At Landsec, we prefer to resolve minor conduct, performance or attendance issues informally between you and your manager.

All employees will be treated fairly regardless of age, disability, gender, race, nationality, religion or belief or sexual orientation.

We also have a **Grievance Procedure**, which is there as a last resort when you have a problem at work.



03.

Health, wellbeing, safety and security

Taking care of your life at Landsec.



Wellbeing

At Landsec, our people are one of our biggest assets. And because your biggest asset is your health and wellbeing, it makes good business sense for us to help you look after it.

Making healthier choices is ultimately up to all of us as individuals. However, as an employer, there's a huge opportunity for Landsec to help everyone adopt healthier behaviours.

We recognise that wellbeing isn't just going to the gym and making better food choices: there's a range of physical, psychological and social aspects that contribute to a healthy lifestyle. You can find out more in our [wellbeing policy](#).



Sickness

If you're not well enough to come to work, our [sickness policy](#) explains how to record your absence, when you'll need a note from your doctor, and what sick pay and benefits you are entitled to.

We also have a confidential Employee Assistance Programme that's available to all permanent and fixed-term employees of Landsec and their immediate families. It helps you work through various life challenges that might adversely affect your job performance, your health or your personal wellbeing.



Health, Safety and Security Policies

At Landsec, one of our highest priorities is ensuring the safety and security of our employees, as well as the millions of people who visit our properties every day.

We are all responsible for taking the right actions to protect our people and our assets from physical and cyber threat, which are set out in our [Health and Safety](#) and [Security Policies](#).

04.

Sustainability

Making sure we run our business responsibly.



Building a sustainable business is at the heart of our vision

At Landsec, sustainability is about creating a lasting positive impact. We work hard to embed sustainability in everything we do. And we keep looking for new ways to make a positive impact – using our experience to create great experiences and benefits for others.

Our **Sustainability Policy** tells you about our overarching commitment to sustainability and the principles upon which our strategy is founded. Our policy doesn't just help us comply with legislation, regulations and codes of practice but also plays an important role in integrating sustainability considerations into our working environment, making sure all our employees are committed to delivering our goal.

Importantly, the policy is supported in more detail by specific policies including:

- **Human Rights Policy** demonstrates how Landsec is committed to respecting human rights in accordance with the UN Declaration of Human Rights. This policy sets out Landsec's core principles, and reiterates our expectation that all employees be treated fairly and with respect.
- **Stakeholder Engagement Policy** guides you through how to engage our customers⁴ in an inclusive and impactful way. Specifically, the policy outlines our objectives in engaging our different stakeholder groups and how to identify and prioritise material issues.

Please familiarise yourself with these policies so you can make sure that our customers, communities and partners are aware of our expectations of them to also adopt sound, sustainable management practices.

05.

Brand and public communications

Helping all of us tell the Landsec story.





Information Security

The policy covers your responsibilities when it comes to using company infrastructure, information and data.

It sets out what you should bear in mind when using company-issued devices, accessing company systems and connecting to Wi-Fi.



Brand Guidelines

At Landsec, our brand guides everything we do.

We're proud of what we've achieved, and our **Brand Guidelines** take you through all the details – explaining our values, behaviours and personality, as well as all the creative tools you need.

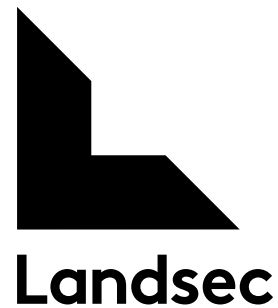




Charitable and political donations

We partner with local and national charities to help support people from disadvantaged backgrounds into work, to support and educate young people, and respond to local issues such as rising homelessness. We do not give one-off donations to charities outside of our partnerships.

As a business, we do not support or donate to any political groups.



Final thought

We recognise that there are situations that may not be covered by any specific policy. In these cases, we encourage everybody at Landsec to make the right decision for themselves.

Before acting, ask yourself whether the course of action you're about to take will fit with our core values. Ask yourself how it would feel if the decision were made public, and how you'd explain it to your friends and family.

If you still feel good about your choice, it's a good sign that it's compatible with our Code of Conduct.

