



**BUREAU
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Bureau Veritas Full External Verification Statement

Objectives

Bureau Veritas has been commissioned by Liberty International to provide an external verification statement for their 2007 Corporate Responsibility Reporting (CR) on its CR website and CR Summary. The aim of the verification statement is to reassure Liberty International's stakeholders that the information presented within the 2007 CR Report is accurate, reliable and objective. We have also considered the completeness of the Report to ensure that it is balanced, has no significant omissions and that it provides a true reflection of the CR impacts and performance of Liberty International over the last year.

The process we have used in this verification exercise is based on current best practice, such as that detailed in the Global Reporting Initiative (GRI), the Accountability Standard AA1000 and the Association of British Insurers (ABI). The outputs of the process are: this External Verification Statement; and an Internal Management Report which contain recommendations to further improve Liberty International's future CR reporting and supporting processes.

Responsibilities of the verification provider – Bureau Veritas

The verifier's obligation is to stakeholders and readers of this report and is exclusively responsible for the contents of this verification statement. Liberty International has provided access to sites, records and data required to undertake a comprehensive verification process and the verifier is confident that no material has been withheld.

Scope

The verification included all Group activities. The information and data reviewed for this verification is inclusive of the following time periods. For data: 1 October 2006 – 31 September 2007 inclusive. For other case study information, evidence was taken from 1 October 2006 to 31 December 2007.

We have verified all factual statements and data in the Report except economic data arising from the financial accounts and company profile.

Methodology

Factual statements and data were verified at Corporate Head Office, Asset and Outsource Partner level. Detailed site audits were conducted at Arndale, Braehead and Lakeside Shopping Centres.

The verification involved a series of interviews, document review, and inspection of internal and external records, interrogation of databases and associated management and reporting systems. This involved challenging and substantiating the content of the material presented in the Report. The integrity and accuracy of aggregated data was tested by tracking sample data back to its source. The methodology for data collection, estimation and aggregation was examined and tested for accuracy and robustness.

Opinion of the verifier

Accuracy of Report

- We are satisfied that all factual statements contained within the Report are accurate.
- We are satisfied that the CR data and performance indicators are reliable and an accurate reflection of data collected at property asset level and collated at group level. We have generally found data collection systems to be robust and trends correct. However, some areas for improvement were identified. This has led to qualifying statements alongside the data and recommendations as appropriate.



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VERITAS**

Completeness, Materiality and Responsiveness of Report

We are satisfied that Liberty International has provided an accurate and balanced Report which are aligned with its CR objectives, and shows a good understanding of its impacts. No significant omissions were found which could affect stakeholders' ability to make informed judgements about its performance. Material issues have been identified and the report can be regarded as complete.

This year we were particularly impressed with:

- The wide range of local community activities with clear objectives and business benefits that Liberty International has supported
- The positive steps that have been taken to improve the quality of data collected
- The carbon footprint work that has been undertaken
- The efforts that have been taken to engage tenants in CR issues.
- The collation of HR data
- The review of CR reporting by undertaking independent stakeholder engagement

Recommendations

Areas identified for improvement are:

Communication of CR issues between Liberty International and the Outsource Partners

- **Recommendation 1:**

The Outsource Partners interviewed by Bureau Veritas demonstrated a very good understanding of CSC's CR programme. The headline CR initiatives and requirements of Liberty International should be communicated to the Outsource Partners for completeness and to secure even greater 'buy in' of CR throughout the supply chain.

[We will continue to develop the incorporation of our CR values into our dealings with our outsource partners.](#)

- **Recommendation 2:**

Liberty International is currently developing a process and programme for implementing its supply chain policy through its critical suppliers. Bureau Veritas recommends that this is progressed during 2008.

[The programme is underway and it is our intention to make significant advances in 2008.](#)

- **Recommendation 3:**

The Environmental Policy and Guide have recently been reviewed and updated. Liberty International should now develop an audit programme to ensure its effective implementation.

[The Environmental Policy & Guide is acknowledged to be one that will require continual monitoring to keep up with emerging trends.](#)



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Processes for data collection

- **Recommendation 4:**

Bureau Veritas was pleased to see that the quality of energy and water data is continuing to improve. We recommend a documented procedure should be reviewed and communicated within Liberty International and Outsource Partners for the collation of the other CR datasets to ensure consistency and accuracy.

It is our intention to develop a set of procedures for the collation of CR data during 2008.

- **Recommendation 5:**

Liberty International currently capture a significant number of environmental and community benefits that result from construction projects. This should be extended to cover all significant benefits arising as a result of planning obligations.

We will consider how planning benefits and obligations might be included in the data capture process where appropriate.

- **Recommendation 6:**

Bureau Veritas saw many examples of strong practice, for example recycling and sustainable transport. Liberty International should further encourage sharing of good CR practices, such as community activities, between the management of shopping centres and its other assets.

The sharing of experiences across our portfolio has already begun and is a process upon which we intend to expand in 2008.

Processes for data retention and storage

- **Recommendation 7:**

A documented procedure should be developed and communicated for the retention and storage of CR data.

We will undertake an analysis of our documented data requirements and the best methods of collating information.

This Verification Statement is supported by a detailed Internal Management Report.

David Murray
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Statement of Bureau Veritas independence and competence

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 170 years history in providing independent assurance services, and an annual turnover in 2006 of €1.8 billion.

London, January 2008

