Investment Board Annual Report

Financial Year 2017/18



CONTENTS

•	Introduction	Page 3
•	Investment Strategy	Page 4
•	Governance	Page 5
•	Investment Performance	Page 10
•	Investment Portfolio	Page 13
•	Property Purchases	Page 17
•	Investment Board Terms of Reference	Page 19
•	Responsible Investment Policy	Page 23

The council has made investments in property to enhance its financial resilience and safeguard services



The council's strategic framework for innovation and investment is supporting the development of new ideas and approaches to enhance the financial resilience of the council. This increased emphasis on developing income streams has led to the creation of the Investment Board to approve acquisitions that contribute to the achievement of the agreed investment strategy, to monitor the performance of the portfolio and ensure satisfactory performance and effective risk management. The financial returns delivered from investment will help to ensure that we continue to deliver quality services for our residents.

The Annual Report of the Investment Board provides an overview of the progress we have made in developing a property investment portfolio and enhancing the financial resilience of the council. The Investment Board is also responsible for evaluating and recommending non-property investments for decision by Cabinet or Cabinet Member, for example the council's equity investment in the Municipal Bonds Agency. The Shareholder Board produces an annual report about each company in which the council owns shares and therefore to avoid duplication this report of the Investment Board focusses just on the Property Investment Portfolio.



David Hodge CBE Leader of Surrey County Council

The Investment Strategy

The Investment Strategy was agreed by Cabinet in July 2013 and was developed in response to the requirement for the Council to enhance its financial resilience in the longer term. The main principles of the Investment Strategy are as follows;

The creation of a diversified and balanced portfolio of investments to facilitate future service provision, manage risk and secure an ongoing annual overall return to the Council

Use of the established Revolving Investment and Infrastructure fund (the Investment Fund) to meet the initial revenue costs of funding initiatives that deliver savings and enhance income in the longer term.

The Investment Fund is to be used to support investments that generate additional income to support the delivery of the Council's functions and services.

Investments that have the potential to support economic growth in the county of Surrey

Retaining assets where appropriate and undertaking effective property and asset management, and if necessary associated investment, to enhance income generation

The Investment Strategy provides the council with the ability to make investments that have the potential to support economic growth or deliver economic regeneration within the county. This may mean that schemes with lower returns are considered however all investments need to demonstrate a return in excess of the cost of capital in order to be affordable for the council. The council is also able to purchase properties that provide for long-term future service use, whilst delivering an investment return. These assets provide flexibility in the estate whilst delivering an investment return.

Cabinet approved the business case for the creation of the Property Company and its associated subsidiaries in May 2014 in order to enable it to invest in property outside the county and to invest for the commercial income return. The companies making up the Halsey Garton Property Group (HGP) were incorporated between June and July 2014.

The investment portfolio of the Council is therefore a combination of assets acquired or developed by the Council for future service need or economic development and those acquired or developed by HGP.

The Investment Board

Governance

- The Investment Board was created in March 2017 following the review of the Investment Strategy by Cabinet and in order to facilitate the further growth of the investment portfolio. Prior to this the Investment Advisory Board was in place to make recommendations for Cabinet approval.
- The Board and its role is noted in the constitution of the council. The Board works in accordance with its Terms of Reference (see Page 16) which are reviewed on an annual basis and in line with a Responsible Investment Policy (see Page 20)

The members of the Investment Board are the Leader, the Deputy Leader and three Cabinet Members chosen by the Leader. The Leader may also, from time to time, appoint one County Councillor to undertake a non-voting role. The board is supported by officers of the council.

Members	 Leader Deputy Leader Cabinet Members x 3 [Tim Oliver, Mel Few & Colin Kemp] Non-Voting Member [Nick Darby]
Advisors	 Chief Executive Director of Finance (Section 151 Officer) Legal Services Manager (Monitoring Officer) Chief Property Officer Head of Strategic Finance (Board Secretary) Supported by external specialist professional advisors

The board is responsible for -

- Ensuring that investment opportunities are thoroughly evaluated, ensuing that there is an appropriate balance between risk and reward and that the acquisition contributes to the achievement of the aims of the strategy.
- Approving property investment acquisitions, property investment management expenditure, property investment disposals and the provision of finance to enable the council's property company to purchase assets.
- Monitoring the progress made in respect of achieving an appropriately balanced and diversified portfolio of assets and its performance.

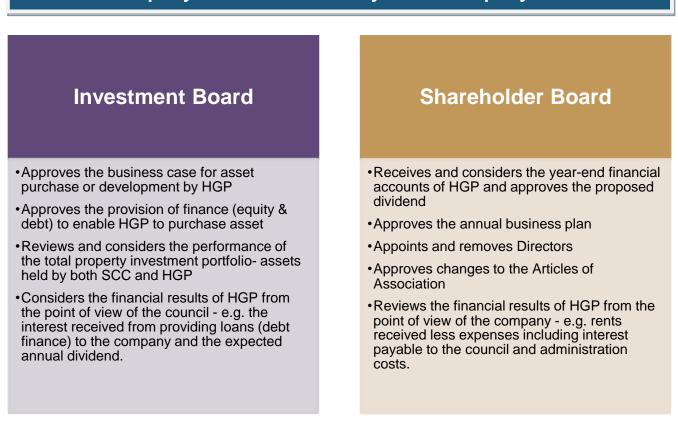
Investment Portfolio

Property Investment

Other Investment The Investment Board is also responsible for evaluating and recommending non-property investments for decision by Cabinet or Cabinet Member depending upon value. These decisions are made in accordance with the protocol for "key decisions" as set out in the Council's constitution, e.g. a Cabinet decision is required for an investment spend of £1m and over. The council's non-property investment assets include debt & equity finance provided to FutureGov Ltd and equity investment in the Municipal Bonds Agency.

The Shareholder Board provides oversight for the council's shareholdings – it safeguards the council's interests and takes decisions in matters that require the approval of the council as owner or as a shareholder of a company. The Shareholder Board produces an annual report which provides information about each company and therefore to avoid duplication this report of the Investment Board focusses just on the Property Investment Portfolio.

The Shareholder Board is responsible also for the oversight of the property company HGP in the same way that is responsible for the oversight of other trading companies created and owned by the council. The link between the two boards is summarised in the table below.

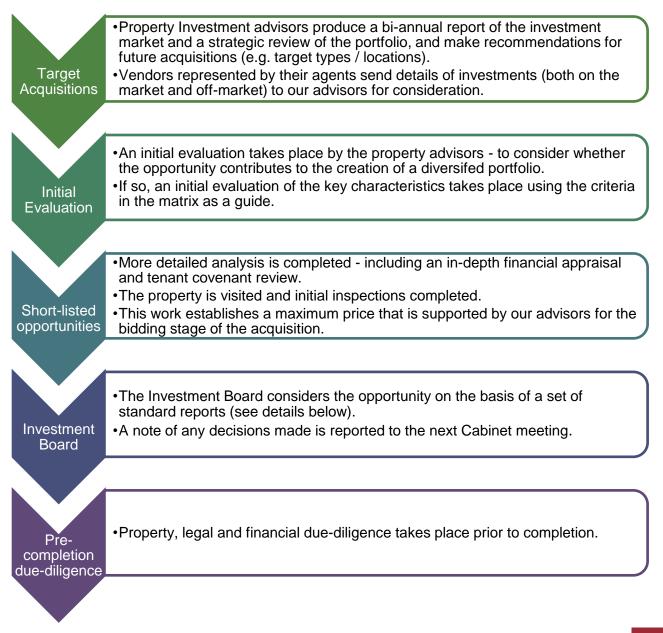


Property Investment & Halsey Garton Property Ltd

Investment Governance

Acquisition selection and appraisal

The Investment Board have delegated authority to approve property investment acquisitions and developments that are in accordance with the Investment Strategy. All investment expenditure is approved on the basis of a roust business case, developed using appropriate specialist property investment advisors and which gives due and proper consideration of the balance between risk and reward and an assessment of the underlying security of the investment. In order that the council undertakes borrowing in accordance with the Prudential Code which requires that borrowing is affordable, sustainable and value for money, all investments are required to demonstrate a return in excess of the opportunity cost of capital and other associated costs of delivery. The diagram below outlines the process for acquisitions-



Investment Appraisal Reports

The following standard reports, together with the sales brochure (if available) are presented to the Investment Board for each potential acquisition-



•A narrative report providing details of the opportunity including, for example, its location, age and tenure. The report discusses key risks and provides information about the tenants and their financial covenant. It provides a summary of the expected returns and describes the scenarios that have been evaluated. If agreed, the report comments on the heads of terms for the purchase.

Investment Matrix

•A standard scoring matrix which is used as a guide to decison making to ensure that opportunities are measured and assessed in a common manner. The matrix looks at the following characteristics-strategy alignment, location (both macro and micro), building quality and age, lease type & length, tenure, property management intensity and tenant repair obligations and whether there are any asset management opportunities.









 A financial analysis in a standard format demonstrating the long-term expected income returns from the opportunity. At least two scenarios are prepared - to show a better and a worse case. Both are prepared using prudent assumptions - for example no rental growth is usually assumed unless the lease provides for fixed uplifts or increases are based upon RPI or similar indices.



Pre-completion due-diligence

Once an opportunity has been approved further due-diligence takes place prior to completion of the purchase. This includes the completion and review of –

Completion Checklist
Building Survey-
Standard Surveys
Reinstatement cost assessment
M&E survey (if required)
Environmental survey
Red Book valuation (for loan purposes for HGP purchases)
Report on Title
Tenant Lease
Finance Arranged
Loan documentation
Equity & share certificates
 Cash flow checked and Treasury instructed
Insurance in place
HMRC Transfer of Ongoing Concern form for VAT purposes
Capital Allowances
Purchase Report (advisor / agent)

Investment Monitoring

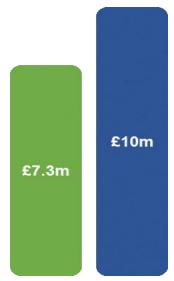
The performance of the investment portfolio is monitored on a monthly basis with summary results reported to Cabinet as part of the regular monthly financial monitoring report. The Investment Board receive detailed reports on a quarterly basis.

Property Investment Performance

The council's property investment portfolio has an asset value of c.£350m, which together with income from agreed acquisitions and developments, will deliver an income of £5.0m in 2018/19 growing to an **income of £7.3m** per annum by 2019/20 and enhancing the asset base of the council. This portfolio has already delivered a net income – of £3.9m in 2017/18 – bringing the total net income from the strategy to £5.4m to date.

These figures are net – after the deduction of all costs incurred including assumed borrowing costs,

The council has ambitions to grow the portfolio further as articulated in the report to Cabinet in March 2017 – to deliver an income of **£10m** per annum by 2020/21.



The current portfolio has been developed over a number of years with the rate of growth increasing more recently. The council has created a good reputation in the market by demonstrating our ability to complete acquisitions to agreed timescales and this means that the council and its property company are increasingly being invited to consider various potential acquisitions, including some that are off-market. Our ability to grow the portfolio further will be dependent upon the right opportunities coming to market.

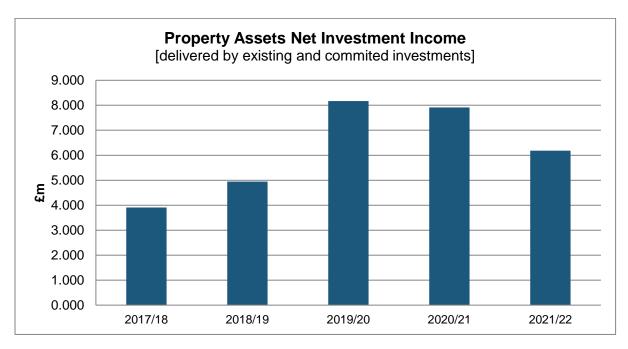
This report provides information about the results achieved so far and the expected results from investments and developments to which the council is committed – potential returns from future potential acquisitions are not included. Due to the confidential nature of individual investments, this report provides high level summary information about the total portfolio. More detailed results, on an investment by investment basis, are provided by the Part Two confidential annex which accompanies this report.

Investment Portfolio	Capital Expenditure	Net Income / (Expenditure)		
Summary Actuals to March	(including	Prior	004740	— / I
2018	prior years)	Years	2017/18	Total
	£m	£m	£m	£m
Property Acquisitions	302.3	5.0	5.3	10.3
Property Development	51.7	-3.3	-1.4	-4.7
Professional & valuation fees		-0.2	0.0	-0.2
TOTAL	353.9	1.6	3.9	5.4

The figures in the table above includes the capital cost of providing finance to HGP and the net income achieved from investments from the point of view of the council. The income consists of the net interest margin receivable by the council on the loans provided to the company plus the estimated annual dividend.

Capital expenditure includes all costs associated with each investment acquisition including the costs of purchase – in particular stamp duty. The capital expenditure incurred will therefore be higher than the value of the asset purchased unless the value of the asset increases in time. The purpose of the investment strategy is to deliver an annual income stream in support of the council's services and in doing so the council is not assuming any gain from the value of the underlying assets. Instead a long term view is being taken since the value of the assets may decrease as well as increase over time. The assets are revalued each year for the year-end financial accounts and further information about this is provided in the part two report.

Assets that are being developed will not produce an immediate income stream and there will be occasions when a tenant triggers their break clause or vacates at the end of the lease resulting in a potential letting void. The council approved the creation of the Revolving Investment and Infrastructure Fund in the budget report approved by the council in February 2013 to meet the initial revenue costs of initiatives. In creating this reserve, the council recognised that it will take some time to build a portfolio that delivers a net income. The reserve is not used to provide for the initial capital expenditure but to provide for the cost of any additional borrowing that is not being offset by income, as is the case for development spend. This has not however been necessary since the net income delivered by acquisitions has offset development spend to date.



The council is continuing to develop its site in Crawley – the first phase of this is now completed and provides accommodation for South-East Coast Ambulance and other third-party occupiers. Phase 2 to develop a pre-let production and training facility is expected to complete and deliver income from 2020/21 onwards. The investment fund will continue to be required to smooth the impact of variations in the annual income due to potential lease expiries and to provide the ability to deliver further developments, including the full development of the Crawley site. The chart above shows

8

forecast net income returns from the current property investment portfolio and from committed schemes over a five year time horizon.

The net income is reported after deducting assumed funding costs and all other costs associated with the investment. The council may fund its capital expenditure through the use of reserves, capital receipts and prudential borrowing. As the council does not hypothecate (match) these funding sources against individual projects or acquisitions, we assume that all the Council's activities in progressing the Investment Strategy will increase the requirement to borrow. The council therefore requires all investments to demonstrate a return in excess of the assumed cost of capital which it calculates based on assumptions in the MTFP which are adjusted if required for market conditions. The council charges the assumed cost of capital to each individual investment (including the cost of finance provided to HGP) in a similar way to an inter-company charge.

Property Investment Portfolio

The investment strategy means that the council is managing different financial risks. Investments will be subject to inherent economic and market risks, and therefore a balanced portfolio of investments is being created. The Investment Strategy notes a preference toward assets within Surrey that are of good quality, in good or growth locations however in order to create a diversified portfolio a mix of geographical locations will be required.

The IB monitors the portfolio to ensure that an appropriately balanced and diversified portfolio is created over time, across the combination of directly Council-owned assets and those owned by HGP. Officers, supported by independent specialist professional advisors, support the IB. These specialist advisors periodically evaluate the recommended portfolio of property investment, taking into account market conditions and achievable returns. The IB also manage the portfolio in order to avoid over-reliance upon single tenants or types of tenants in terms of their impact as a percentage of the portfolio.



The total asset value of the current property portfolio, based upon the valuation exercise undertaken on 31st March 2018 and incorporating assets under construction is £346m. The portfolio incorporates assets held by the council and by HGP.



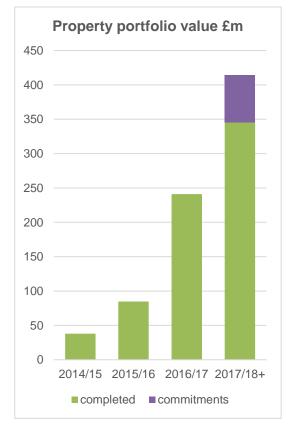
The tables and charts in this section of the report provide further information about the current portfolio - the aspects of the portfolio and its diversification – the asset class, the geography and the tenant mix. The charts do not include acquisitions or developments not yet completed since the information is based upon year-end balance sheet values and current rents but where appropriate a commentary is provided about the impact of commitments.

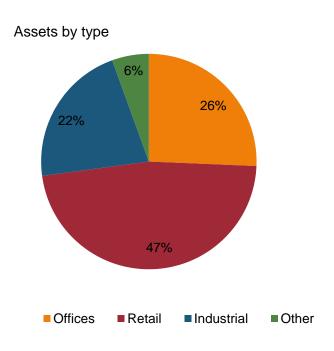
Asset Class

8

Property Portfolio	Asset Value
as at 31.03.2018	£m
Offices	89
Retail	163
Industrial	75
Other	19
Total	346

Achieving a fully diversified portfolio will take time and will be dependent upon the opportunities in the market.





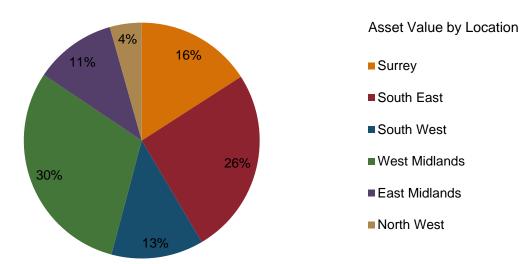
The portfolio is under-weight in the Industrial sector however this will improve with the completion of Phase 2 of Nexus, Crawley. Further industrial purchases are being sought and evaluated by HGP and it is expected that further acquisitions in this sector will be achieved during 2018/19 however competition for this class of asset has been increasing.

Similarly further acquisitions will be identified to increase the holding in Offices. The increase in retail assets follow the purchase of a retail park in Malvern, Worcestershire. This is an out-of-town multi-let scheme with a range of tenants including M&S, Matalan, Next and Poundland.

Investment decisions that have been made but not yet completed will further alter the portfolio. The Farnham Brightwells acquisition will increase the retail holding once the development is completed in 2019.

Geographic Mix

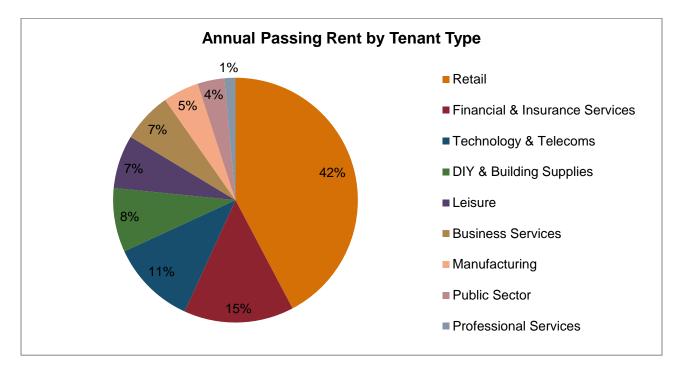
The Investment Strategy notes a preference towards assets within Surrey however a mix of geographic locations is required in order to achieve a diversified portfolio. The total asset value of property held for investment purposes within Surrey is £55m / 16% of the portfolio.



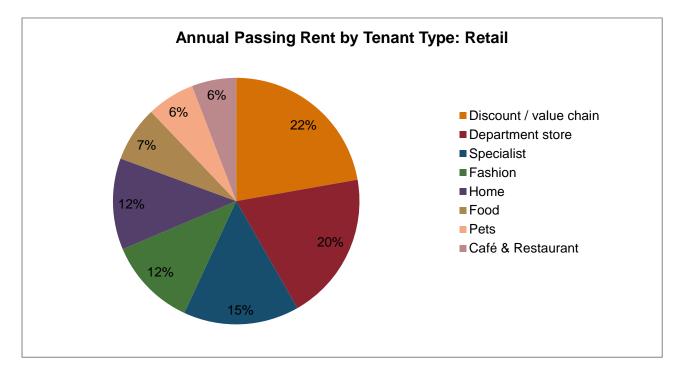
Tenant Analysis

8

The following chart provides an analysis of the annual passing rent by type of tenant. The most significant exposure is to retail tenants, followed by tenants in the financial and insurance services industries. The second pie chart provides a further breakdown of the retail tenants.



Retail tenants are 42% of the portfolio when analysed by the annual passing rent – of this, the biggest type of tenant is in the value chain or discount sector with tenants that include Poundstretcher, Poundland, Argos and B&M.



Property Purchases

The tables that follow provide a list of purchases made by both SCC and HGP up to 31st March 2018 as part of the Investment Strategy. These tables exclude the cost of development activity which is commercially sensitive and therefore covered more fully in the part two report. The part two report also includes a note of the current valuation for each asset.

Assets held by SCC	Purchase Price	Acquisition Date	Description
Abbey Moor, Chertsey	1,100	Sep-12	Golf Course (public 9 holes) & Club House
Ranger House, Guildford	13,700	Apr-13	Multi-tenanted town centre office
Kingfisher House, Egham	1,750	Apr-13	High Street shop
Waterman's House, Woking	695	Jun-13	Office redevelopment opportunity
Bridgehead House, Ashtead	1,075	Dec-13	Single tenanted office
Nexus Crawley	9,750	Mar-14	Land purchase
61 High Street, Staines	3,573	Apr-14	High Street shop
Pixham Lane, Dorking	34,545	Feb-16	Single tenant headquarters office
Brightwells, Farnham	3,000	Feb-18	Long leasehold land purchase

0	s		,		
Ŭ	C		1		
	•	-	1		

Assets held by HGP	Purchase Price	Acquisition Date	Description
Hampton Park West, Melksham	10,455	Nov-15	Manufacturing and warehouse facility
Washford Mills, Redditch	7,451	Mar-16	Retail warehouse units
Hawkley Drive, Bristol	11,219	Apr-16	Manufacturing and warehouse facility
Manton Wood, Worksop	8,460	May-16	Distribution warehouse
Aztec West, Bristol	19,900	Jun-16	Single tenanted office
Wiggs House, Salford	7,760	Jul-16	Distribution warehouse
Friar Street, Worcester	11,800	Nov-16	Cinema and retail / restaurant units
Birmingham Rd (Travelodge), Stratford	9,200	Nov-16	Hotel and retail units
Willowbrook, Loughborough	18,850	Nov-16	Retail units (out of town location)
Oakgrove, Milton Keynes	26,461	Dec-16	Retail units (out of town location)
Stratham Street, Macclesfield	6,900	Dec-16	Retail warehouse unit
High Street, Winchester	15,825	Mar-17	High Street department store
Blenheim Park, Nottingham	2,852	Aug-17	Land purchase for warehouse development
Malvern Shopping Park, Worcestershire	75,038	Sep-17	Retail units (out of town location)

SURREY COUNTY COUNCIL

INVESTMENT BOARD



TERMS OF REFERENCE

Overview

The Investment Board will oversee the development and management of the portfolio of investments created in accordance with the Investment Strategy of the council. The board has delegated authority from the Leader to;

- approve property investment acquisitions
- approve property investment development and management activities and expenditure, including decisions to take, grant or surrender a lease or licence
- approve the provision of finance to the council's wholly owned property company, Halsey Garton Property Ltd, for the purposes of the Investment Strategy
- approve property investment disposals (including those held by Halsey Garton Property Ltd)

The board will recommend non-property investments to Cabinet for approval.

Membership

The Investment Board membership will be the Leader of the Council (Chairman), the Deputy Leader plus three Cabinet Members appointed by the Leader. In addition, from time to time the Leader may appoint one County Councillor to undertake a non-voting role.

The Investment Board will be supported and advised by the following officers of the council;

- Chief Executive
- Director of Finance
- Legal Services Manager (Monitoring Officer)
- Chief Property Officer
- Secretary to the Board

The Investment Board will additionally be supported as required by appropriate professional external advisors which will be commissioned by the Investment Board when deemed necessary in relation to specific investment or types of investments.

Purpose

- 1. The Investment Board will consider all proposals that contribute to the delivery of the investment strategy and meet the investment criteria. Officers will provide advice on each proposal for consideration. This advice will include how each investment proposal could be taken forward, including a consideration of the risks, structuring and financing required.
- 2. Each investment considered by the Investment Board will be supported by a business case. In approving a business case, the Board will satisfy itself that the investment is within the council's legal powers, it has properly considered the advice provided and its structure provides value for money taking into account all financial considerations, including taxation. Full due and proper consideration will be given to the balance achieved between risk and reward and the underlying security of the investment proposed to ensure compliance with the fiduciary duty of the council.
- 3. The Investment Board will be responsible for approving all property investment acquisitions and for approving the provision of finance to the council's wholly owned property company, Halsey Garton Property Ltd, for the purposes of the Investment Strategy.
- 4. The Board will be responsible for approving all property development expenditure where this results in an asset that will be managed as part of the investment portfolio and will be responsible for approving property management activities and expenditure for the portfolio including projects that deliver additional value to an existing asset. The board will be responsible for decisions to take, grant or surrender a lease or licence. The Board will be responsible for the approval of the provision of finance to Halsey Garton Property Ltd for the same purpose.
- 5. Appropriate non-property investments will be recommended to Cabinet for approval.
- 6. The Investment Board will be responsible for approving the strategic management of the overall portfolio of investments, ensuring that an appropriately balanced portfolio is maintained over an agreed period and that all risks, including those that are emerging are given due consideration.
- 7. Unless approval of Full Council is required by law the Board will be responsible for approving the disposal of property investment assets including those held by Halsey Garton Property Ltd.
- 8. The Investment Board will consider and recommend the use of the Revolving Investment and Infrastructure Fund (the Investment Fund) to meet the initial revenue costs of appropriate initiatives that deliver income in the longer term. The Board will receive reports twice a year regarding the status of the Investment Fund for consideration.
- 9. The Investment Board will approve the use of the Revolving Investment and Infrastructure Fund to procure external advice, for example property investment advisors, legal and financial specialists, including taxation advice.

Scrutiny

- 10. The Investment Board will provide a report on the investment portfolio and its performance to Cabinet annually and provide summary information to each Cabinet meeting as part of the update of decisions taken and the financial monitoring report.
- 11. The Corporate Overview Select Committee will be able to call the Investment Board to account for progress in relation to achieving the stated aims of the Investment Strategy.

Scope

- 12. The Investment Board will consider all significant investment activity including, but not limited to, the acquisition of property, share capital and provision of financial assistance, for example loan financing.
- 13. The Investment Board will consider investment in council owned trading companies (LATC) where the proposal includes significant financial investment in excess of £1.0m. Once established, trading companies will be overseen by the Shareholder Board.

Evaluation Criteria

14. The Investment Board will apply the criteria described in the Investment Strategy approved by Cabinet in July 2013 in evaluating proposed investments. These are;

a) The acquisition or investment is within the powers of the Council and can be undertaken with appropriate regard to tests of reasonableness, fiduciary duty and value for money.

If this is the case, then the following criteria will be evaluated;

b) The amount of investment required is greater than the threshold for investment which has been set for the Investment Strategy (initially more than £10m except for trading opportunities where this threshold will not apply). In establishing the portfolio it may be the case that smaller sized investments will be considered.

c) The period over which a return will be made, ensuring that this is achieving a balance between the short, medium and longer term.

d) Whether the investment aids the achievement of a balanced portfolio in the longer term.

e) That the rate of return is consistent with the level of risk involved (within tolerances) as defined by the Investment Strategy.

Meetings

- 15. The Investment Board will have scheduled meetings on a monthly basis with further meetings arranged if necessary in order to respond promptly to opportunities. Meetings will be cancelled if there are no agenda items to be discussed.
- 16. The quorum for the Board is a minimum of 3 members, with one being the Leader or Deputy Leader.
- 17. The Chairman approves the agenda for each meeting. The agenda and papers for consideration are circulated at least two working days before the meeting. After each meeting, the Chairman approves the meeting notes and actions agreed. Susan Smyth, Strategic Finance Manager, will act as secretary to the Board.
- 18. The Investment Board will review the Terms of Reference annually.

SURREY COUNTY COUNCIL INVESTMENT BOARD RESPONSIBLE INVESTMENT POLICY



1.0 Introduction

The primary purpose of the Investment Board is to deliver the Investment Strategy. This strategy was developed in response to the requirement for the Council to enhance its financial resilience in the longer term. The primary deliverable for the strategy is the creation of a diversified and balanced portfolio of investments to facilitate future service provision, manage risk and secure an ongoing annual overall return to the Council. The strategy prioritises investments that have the potential to support economic growth in the county of Surrey and the retention of the Council's existing assets, undertaking effective property and asset management and where appropriate, investment and development to enhance value and income generation.

The Investment Board is responsible for the development and management of the portfolio in accordance with this strategy and has delegated authority from the Leader to;

- approve property investment acquisitions
- approve property investment development and management activities and expenditure, including decisions to take, grant or surrender a lease or licence
- approve the provision of finance to the council's wholly owned property company, Halsey Garton Property Ltd, for the purposes of the Investment Strategy
- approve property investment disposals (including those held by Halsey Garton Property Ltd)

The board will recommend non-property investments to Cabinet for approval.

2.0 Responsible Investment

Environmental, social and governance (ESG) issues can have a material impact on the value of assets and on the long-term performance of investments and therefore need to be considered in order to manage risk and returns. Responsible Investment is the practice of incorporating ESG issues into the investment decision making process. An ethical investment approach may involve one or a combination of the following approaches:

- Negative screening: this means avoiding investment in companies or sectors or companies undertaking a particular activity or operating in a way which may be harmful to the investor's interests.
- Positive screening: this means investing all or part of an investment portfolio in companies or sectors which reflect the investor's values in areas such as environmental protection, health, employment or human rights, or in a wider range of companies that demonstrate good corporate social responsibility and governance.

3.0 Investment Board Responsible Investment Policy

The Investment Board will undertake Responsible Investment by considering ESG issues as part of its decision making process. The Board will consider material ESG factors when analysing potential investments. The factors to be considered are those which can cause financial and reputational risk, ultimately resulting in a reduction in investment or shareholder value.

ESG issues to be considered include, but are not limited to-

Environmental	Energy ManagementResource ManagementClimate Change
Social	 Human rights Child labour Supply chain Employment standards
Governance	 Tax transparency Company ownership Risk Management Audit standards Bribery & Corruption

The Board do not wish to adopt an exclusionary policy (negative screening), but individual investments may be excluded if perceived to conflict with the Council's values and purpose.

The following ESG issues, which are particularly relevant to an Investment Property Portfolio and property development activities, will be specifically considered-

- Housing Development and Affordable Housing
- Energy Management & Sustainability
- Tax Transparency

3.1 Housing Development

In undertaking and approving residential property development, the Investment Board will work with partners, where appropriate and;

- is committed to providing affordable housing on suitable sites and in compliance with the requirements of the local planning authority.
- will ensure that these developments comply with Building Regulations as appropriate for each application.
- will be compliant with the Council's commitment to protect the green belt in accordance with both national and local policy and compliant with the Local Plans of the Districts & Boroughs.

3.2 Energy Management & Sustainability

In undertaking and approving commercial and retail property development and investment, the Investment Board;

- will ensure any developments comply with Building Regulations as appropriate for each application.
- is aware of legislation regarding Energy Performance Certificates (EPC's) and the requirements of landlords in this regard.
- will ensure refurbishment and redevelopment proposals achieve the required levels of EPC scores to remain effective investment assets.

3.3 Tax Transparency

The Investment Board will not approve the purchase of investment properties by the means of purchasing an offshore trust or units in an offshore trust that is designed to avoid UK tax.

4.0 Governance & Scope

The Investment Board will report any significant ESG related matter as part of its report on the investment portfolio considered by Cabinet annually and scrutinised by the Corporate Overview Select Committee.

The Investment Board will review the Responsible Investment Policy annually.

The Responsible Investment Policy will apply to all investment decisions made by Surrey County Council and will apply to its wholly owned property company Halsey Garton Property Ltd and to all other council owned or controlled companies and legal structures that undertake property investment and development activities.

This page is intentionally left blank