Management review CO_2 management system CO_2 performance 2023

Renewi Netherlands Holding B.V

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1 | Introduction

1.1 | Purpose of this report

The report below is a summary of the input and output of the CO_2 management system that has been implemented within Renewi Group, and particularly (for the purpose of CO_2 Performance Ladder), at the Commercial Waste NL, Commercial Waste BE, Mineralz & Water and Specialities divisions nested under Renewi Netherlands Holding BV and the Belgian entity Renewi NV.

In the satisfaction of the relevant ISO requirements, it consists of two parts: an evaluation of the organization's performance in energy and GHG emissions, and the evaluation of the management system put in place to achieve this.

- Performance
    - Boundary description
    - CO_2 profile of the organization
    - Energy analysis
    - Initiatives undertaken to decrease the emissions and energy consumption and their progress
- Management system
    - Evaluation of the data and management quality
    - Evaluation of information distribution system
    - Evaluation of the reduction governance
    - Process improvement plan for the upcoming year

The aim of this management review is to evaluate the previous reporting cycle (FY23) and verify whether the proposed control measures have contributed to achieving the set CO_2 reduction targets. As Renewi's GHG footprint is measured twice a year, so the report is also released twice a year – once in full (end of year), and at least in a brief summary version (mid-year).

It forms the basis for the Divisions' management to decide whether the above gives cause for adjustment by means of new control measures or adjusted objectives. The resulting actions will be included in the regular revision of the Energy and CO_2 Management Plan.

In the past, this report's content has been delivered in 3 documents:

- Directiebeoordeling
- Energiebeoordeling
- Energie and CO2 Management plan

As of October 2023, the key messages from all these documents have been synthesized into one – within this document.

Thousand separator has been noted as a comma (,) and decimal places are preceded by a period (.).

1.2 | Introduction to Renewi

Renewi plc was formed in 2017 from a merger of Shanks plc and Van Gansewinkel Groep BV and is a waste-to-resource company. Every year, the organization processes about 10 million tons of waste.

The scope of the CO2 performance ladder includes the legal entity Renewi Netherlands Holding BV and its three divisions that are (partly) located in the Netherlands: Commercial Waste Netherlands, Mineralz & Water and Specialities. As a result of the supplier analysis, Renewi NV representing the Commercial Waste Belgium (CWBE), has been added to the reporting boundary.

Commercial Waste Nederland (CWNL) is the market leader in the collection and processing of both hazardous and non-hazardous waste. With more than 3000 FTE staff, more than 1200 collection vehicles and operating from more than 60 locations, Commercial Waste NL offers solutions for all types of waste throughout the Netherlands.

Commercial Waste Belgium (CWBE) runs a very similar business on the other side of the border, facing the most rigorous regulation around waste sorting in Europe – where entities are required to separate 24 fractions of waste in Flander with the Vlarema 8 regulation. Thanks to a new cutting-edge sorting facility, CWBE is positioned to lead the market in such demanding circumstances.

Mineralz & Water is a European leader in the field of cleaning contaminated soil and wastewater. This division is divided into ATM, with a location in Moerdijk, CFS in Weert and the Mineralz locations. The main activities of this division are: soil cleaning, soil remediation and production of raw materials from immobilized bottom ashes and contaminated soil.

Specialities consists of 3 sub-divisions, 2 of which *are dedicated* recycling companies and the processing activities in the United Kingdom.

- Coolrec – WEEE (electrical and electronic waste)
- Malta – glass recycling
- Municipal – UK household waste processing

Municipal, with its activities separate from the other Specialities activities and taking place 100% in the UK, is not part of the scope of this certification.

For the same reason, the activities performed by Group employees, are not included in the totals for CO2 Performance Ladder certification – those functions serve the whole group, therefore the attribution of their impacts between the certified and non-certified parts of a business would be counterproductive.

The majority of the divisions' activities described here take place in the Netherlands, but some companies also have locations or activities abroad. These activities cannot be viewed separately from the Dutch activities and are therefore included in the scope of the CO2 performance ladder. For more information about these divisions and Renewi's activities, see the website www.renewiplc.com (in English)

2 | Performance

2.1 | Boundary description - Renewi Netherlands Holding BV and Renewi NV

This report evaluates the CO_2 reduction system from the perspectives of the CO_2 Performance Ladder boundary. The only material difference between the CO_2 Performance Ladder and Group Boundary is the inclusion of Municipal into the Group boundary, which does not take place for the Dutch-based CO_2 Performance Ladder. The process of data collection and management does not change.

Inputs:

- *4.1 Boundary 20230821.xlsx*
- *20230623 SUSTAINABILITY REPORTING MANUAL - GHG Scope 1+2 FINAL_BDO.ppt*
- *[as of 20230824] SCOPE 1and2 - OPS control Carbon accounting - ALL RENEWI MASTER.xlsx ("the OPS Control file")*
- Raw files stored in the folder: *AC analysis source files*

Renewi follows the Operational control rule in determining its GHG accounting boundary. Details can be found in the *"Sustainability Reporting Manual - GHG Scope 1+2"* file.

The boundary of Renewi Netherlands Holding has been determined on the basis of the organization chart of Renewi in March 2023. A regular update of the organizational chart is expected in October 2023; therefore, it will be included in the next review cycle. Group Central Services are excluded from the below analysis as these activities support all legal entities, not just those that are being audited under CO2Prestatieladder.

Site-level detail is listed in the *OPS control* file. The OPS control file further contains:

- An overview where all locations are linked to the legal entities to ensure that no locations or entities are overlooked
- List of companies that are excluded from the boundary with the reason for exclusion

Allowed reasons for exclusion are detailed in the Reporting Manual.

There are 3 organizational entities with subsidiaries that must be included on the CO_2 Performance Ladder certificate, namely:

- Specialities (Maltha + Coolrec),
- Mineralz & Water
- Commercial Waste NL.

An AC Analysis of suppliers discovered that Renewi NV is one of key suppliers to the entities within the original boundary, therefore its figures are added to the below overview.

Update 2022: The year 2022 saw a recalculation of the GHG baselines and an update and clarification of reporting boundaries. All entities which were undergoing sale in the year of baseline recalculation, were already excluded from the baseline.

Update 2023:

Additions	The acquisition of Paro was added to the boundary as the Westpoort entities (2 sites: in Arnhem and Amsterdam). Sardinieweg site in Amsterdam was under construction during the baseline year FY22 (and completed in the midst of that year, November 2021) – therefore FY23 is the first year where this site is able to provide data. 1 site of Belgium was identified to be relevant in FY23 but was not on team's radar in FY22 (Court St Etienne).
Exclusions	3 sites of M&W were sold to Indaver and excluded from the boundary: Leeuwarden, Veendam, Groningen. 1 site in Belgium was closed: Seraing. Further details provided in a copy of the OPS Control file.

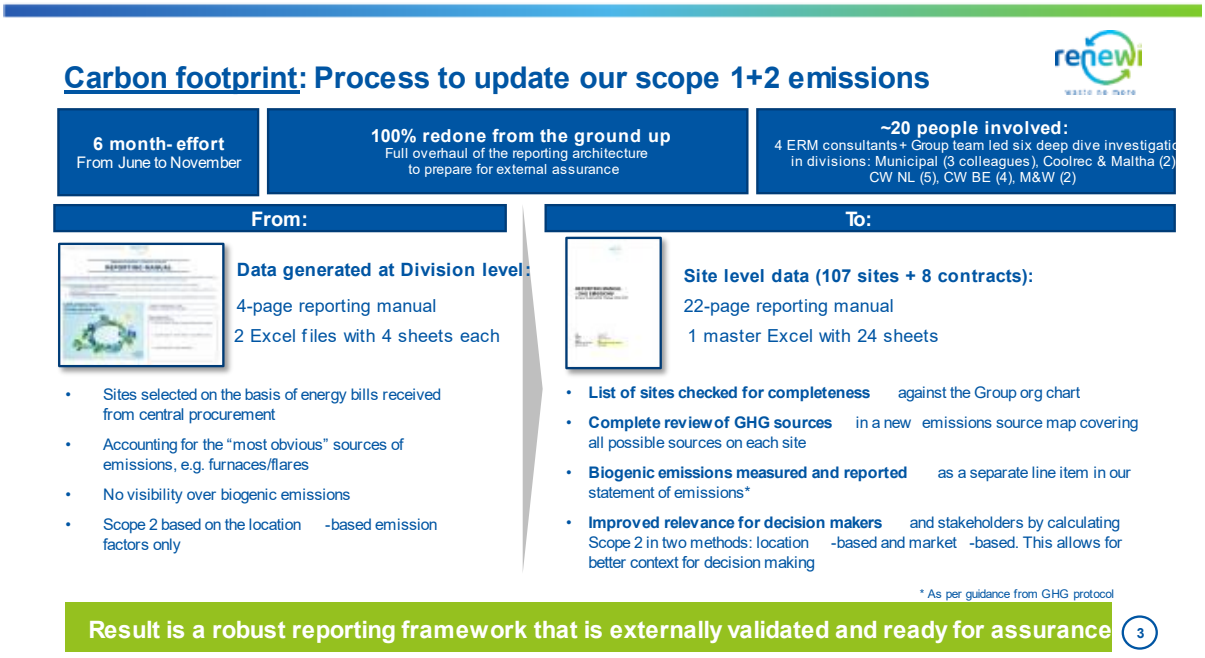
2.2 | CO2 profile of the organization

Baseline restatement:

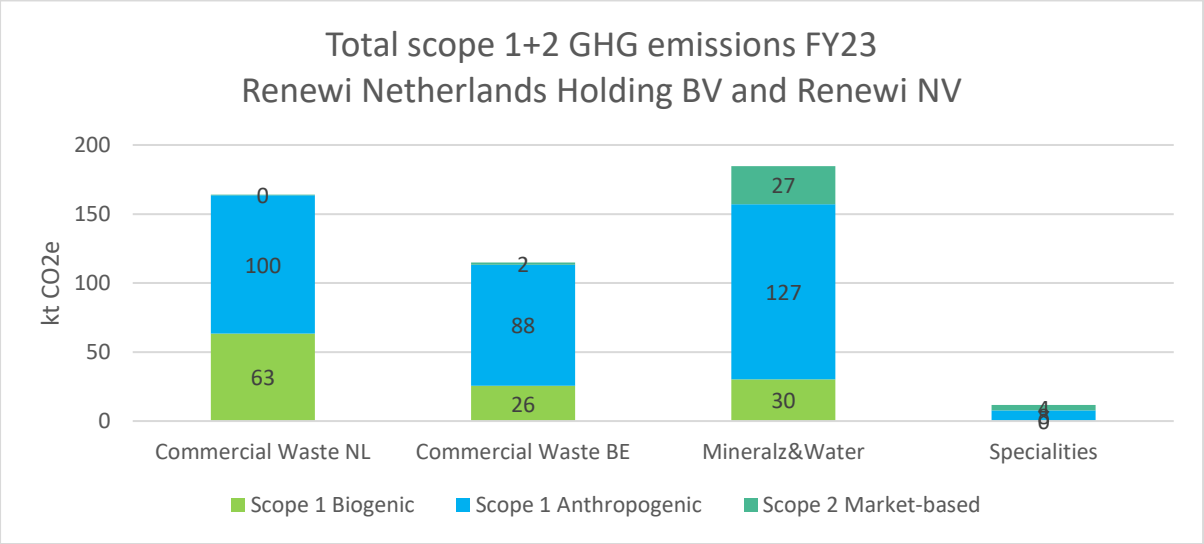
In 2022/2023 Renewi underwent a thorough investigation into its emission sources to make internal reporting adequate to the rigors of GHG Protocol. The investigation resulted in a full recalculation and restatement of our Scope 1 and Scope 2, and first-in-time calculation of Renewi's Scope 3. As a consequence, in the FY23 report, which was published in June 2023, Renewi restated its baseline as FY22, recalculated according to the new calculation methodology, and published FY23 figures, also calculated with the new approach.

Additionally, Renewi is departing from the previous practice of calendar-year reporting to SKAO and aligns its disclosure cycle with the financial years (in line with the public disclosures in the Annual Report and Sustainability Review annually).
Therefore, all the records previously verified by the CO2Prestatieladder audit will no longer be comparable to the new results.

The management of CO_2 emissions within the part of business that is covered by CO2Prestatieladder is following the exact same process as the Group calculation described.



Insight – CO_2 Profile of Renewi Netherlands Holding BV and Renewi NV



Renewi Netherlands Holding has restated the baseline emissions to 543,172 tons CO_2e in FY22 (market-based). In FY23, the emissions dropped to 475,123 tons CO_2e.
The decrease between 2022 and 2023 can be attributed to a decrease in tonnages, which explains lower process emissions as well as lower use of fuel. Additionally, continuous improvement activities have been performed around sites maintenance to improve the landfill gas capture and further optimization of routes through the Green Collective initiative.

Direct process emissions (incl. composting, MBT, landfill gases, etc.) account for the largest share in the CO2 emissions, averaging over the reported two years 65% of the total. This occurs in the composting and fermentation of green waste, decomposition processes in landfill waste, incineration of landfill gas and the incineration and/or processing of polluted soil and other hazardous waste at ATM. Within the process emissions, the dominant single source (~40%) is the process emissions at ATM (Mineralz & Water).

Process emissions tracked at Renewi

Division	CW NL	CW BE	M&W
Anaerobic digestion	• Commercial Waste NL:: Amsterdam - Corsicaweg 15 (CHP+Flare+Fugitives) • Commercial Waste NL:: Lelystad - karperweg 20 (CHP+Flare+Fugitives)	• Commercial Waste BE:: Roeselare - Regenbeekstraat 7c (CHP+Flare+Fugitives)	
MBT/ Composting	• Commercial Waste NL:: Amersfoort - Lindenboomseweg 15 (Green waste) • Commercial Waste NL:: Hoek van Holland - Nieuw Oranjekanaal 45 (Green waste) • Commercial Waste NL:: Stadskanaal - Industriestraat 10 (Green waste) • Commercial Waste NL:: Lelystad - karperweg 20 (VFG) • Commercial Waste NL:: Drachten - Stuurboord 11 (VFG) • Commercial Waste NL:: Lelystad - Zeeasterweg 40 (Mixed waste)	• Commercial Waste BE:: Eeklo - Ringlaan 58 (Green waste) • Commercial Waste BE:: Ronse - Weverijstraat 11 (Green waste)	
Landfill	• Commercial Waste NL:: Amersfoort - Lindenboomseweg 15 (CHP+Flare+Fugitives)	• Commercial Waste BE:: Mont -Saint-Guibert (Sorting Centre) - Rue Des Trois Burettes 65 (Rue de la Petite Siberie) (CHP+Flare+Fugitives)	• Mineralz&Water:Mineralz: Braine le Chateau - Rue Landuyt 140 • Zweekhorst • Maasvlaakte • Braine – Bois de Hal • Braine – Marbais
Incineration of waste			ATM

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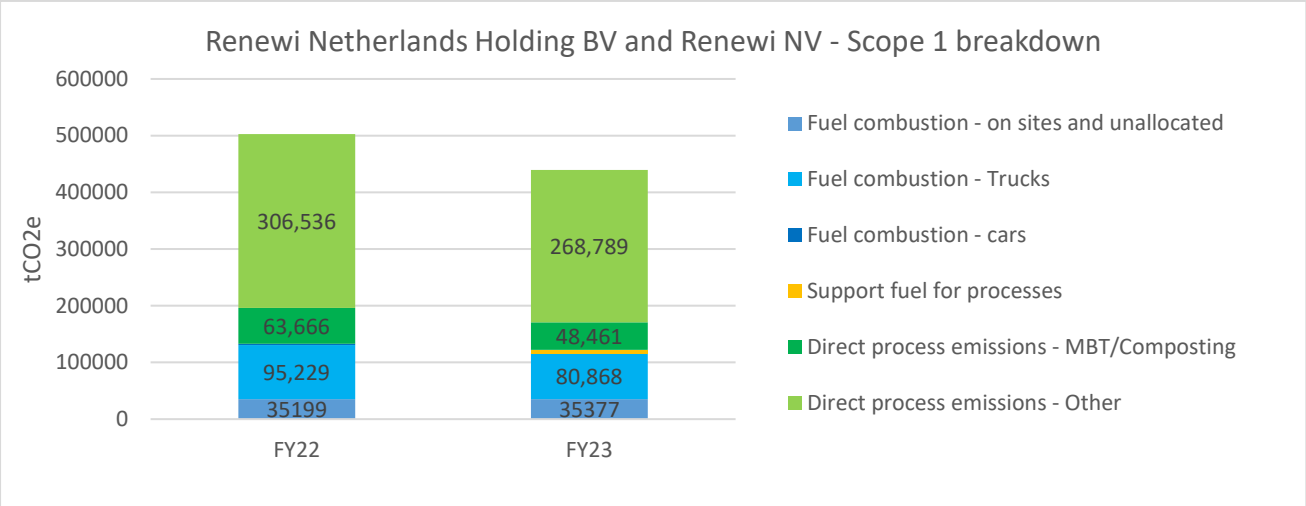
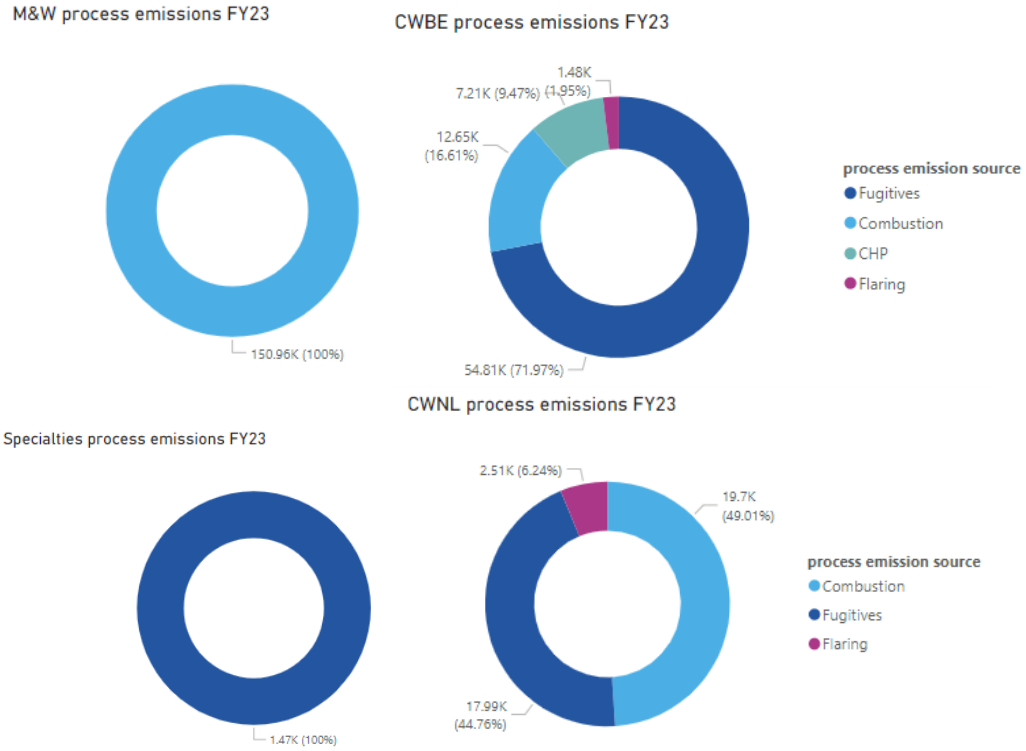


Composting/ MBT/AD
In the period 2022-2023, the emissions associated with composting have remained in line with the composted volumes. The emissions are calculated on the basis of a fixed emission factor per compost type and are therefore related 1 to 1 to the amount of composted material.

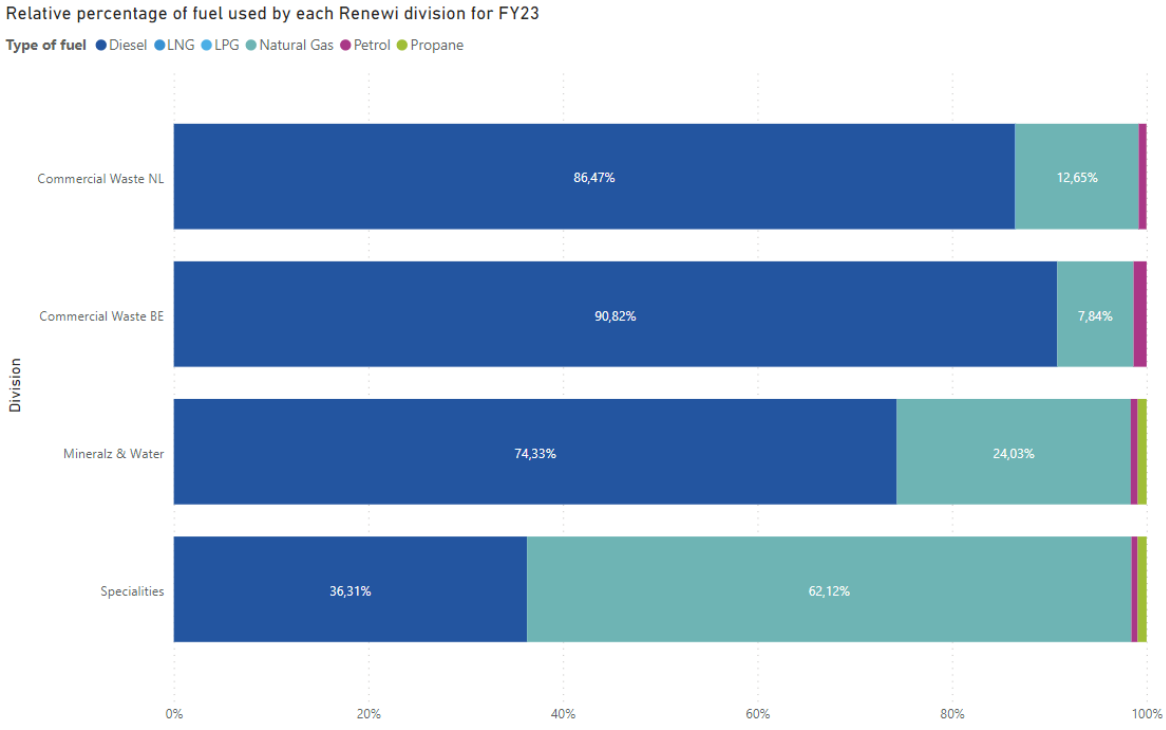
Other process: Landfill
Landfill emissions, consisting largely of methane, are related to processes in the landfill site, which lead to diffuse emissions. They are decreasing with the amount of landfill gas that is captured converted into electricity in a CHP, or flared. The emissions at the landfill site in Amersfoort (Commercial Waste NL) have been slowly decreasing. At the M&W and CW BE landfill sites at Braine le Chateau & Mont-Saint-Guibert, the emissions in FY22 and FY23 have remained relatively the same. Emissions are expected to decrease even further now that the landfill site is no longer being replenished.

ATM Process emissions
The slight decrease in process emissions at ATM (157,533 in FY22 and 144,096 in FY23) can be explained by a decrease in processed tons of polluted soil.
These tonnages are being stripped of polluting organic substances in a thermal cleaning installation. Significant amounts of CO_2 are released during this process. The installation is powered by the fuel recovered made from waste, but at times, fossil fuel has to be used as a support fuel to maintain the continuity of the process. This is one area where we could optimize the energy supply. The possibility of capturing CO_2 is currently being investigated, but it is not expected that this will be accomplished in the short term (<5 years). This has to do with the required infrastructure both on site as well as off site. Especially off-site, where we are dependent on third parties and government.

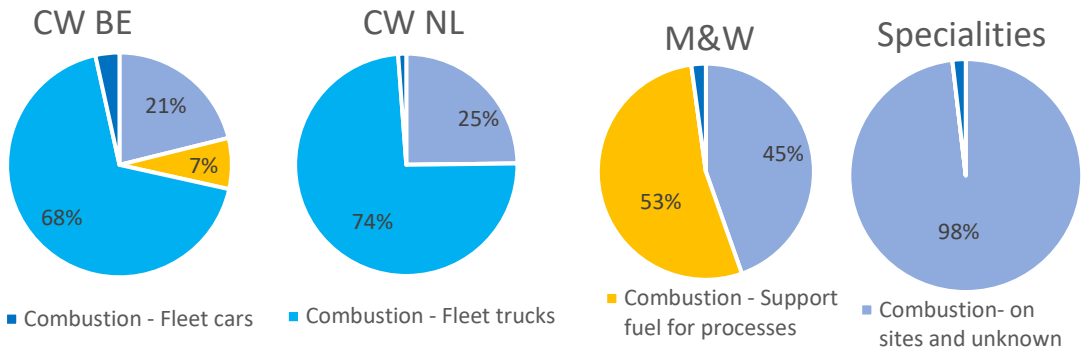


Fuel use

Emissions from the fuel consumption are the second large lever of the GHG emissions. The most visible application is the use of diesel by the trucks in CW NL and CW BE.

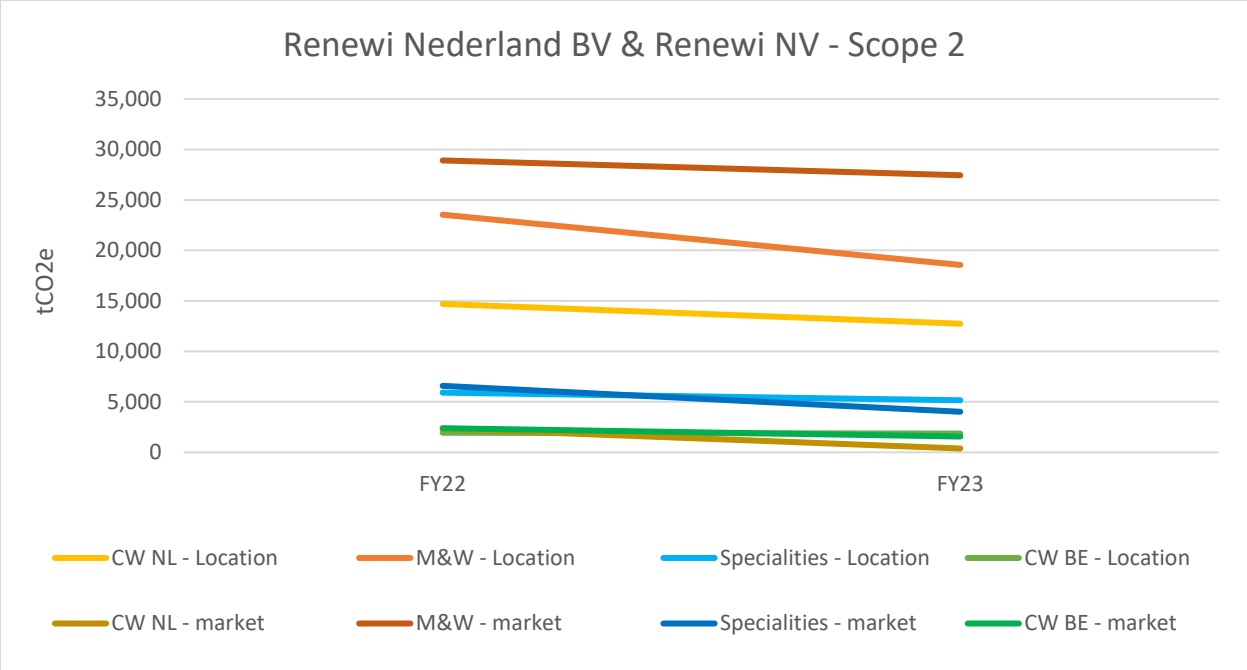


Significant contribution to the footprint is made by the on-site usage of fuels. This is used to power the yellow fleet (forklifts, shovels, cranes) as well as to heat buildings and generate electricity. Below please find the fuel application profile for each of the divisions (based on FY23):



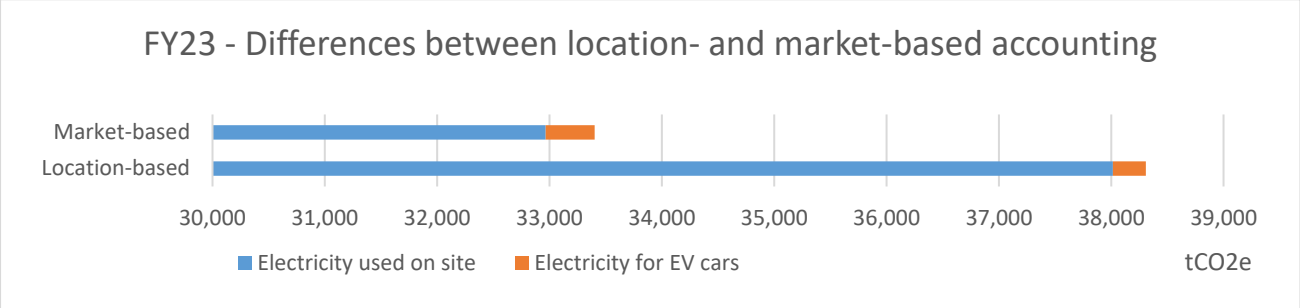
While between FY22 and FY23, the total emissions from fuel use have not changed significantly, in the coming years we expect shifts between the volumes of types of fuel applied. This is a result of an ongoing investigation into increasing the use of biofuels, substituting high-emissions intensive fuel with a "lighter" one, and looking into own supply of energy (see next section).

Purchased electricity
Renewi is not purchasing steam, heat or cooling as such, therefore the only form of energy tracked in Scope 2 is electricity.



The lack of information about supplier-specific emission factors is dragging up the M&W emissions in the market-based approach.
The green certificates policy in Coolrec and CW NL makes a difference in the order of magnitude of ~5,000 tons CO2e annually (the difference between market-and location-based approaches).
A very curious situation happened in CW BE, where the supplier-specific emissions factor (EF) turned out to be higher than the country average. This way, any gains from the green electricity

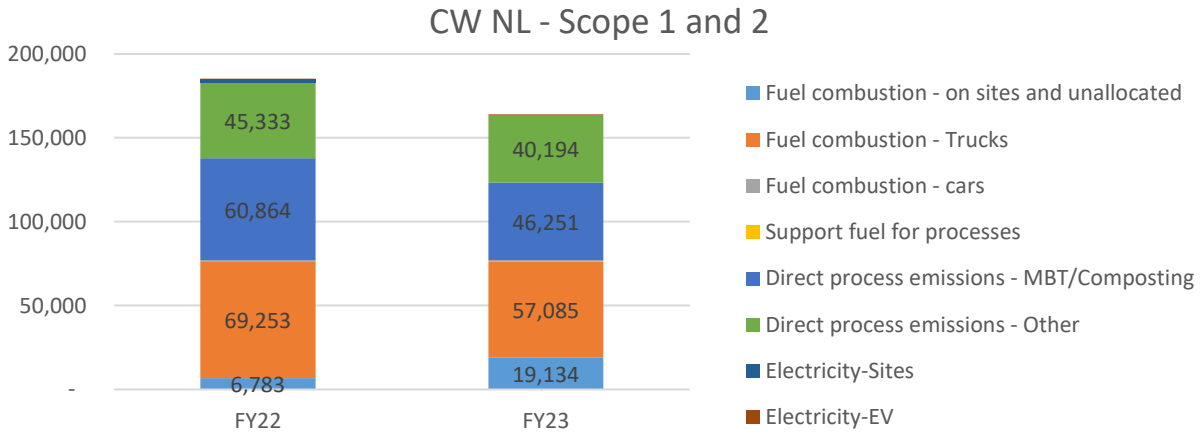
have been offset by this grey supplier and no significant difference between the market and location approach is visible.

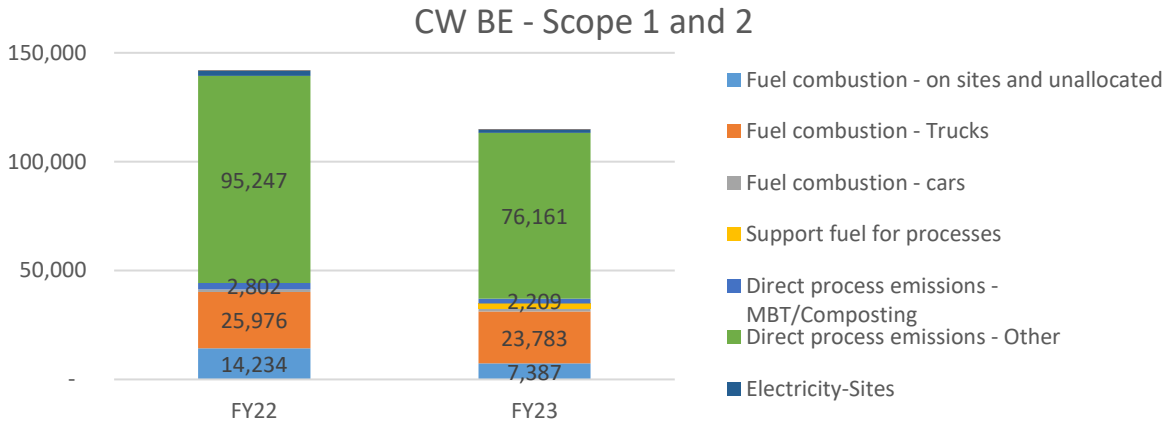


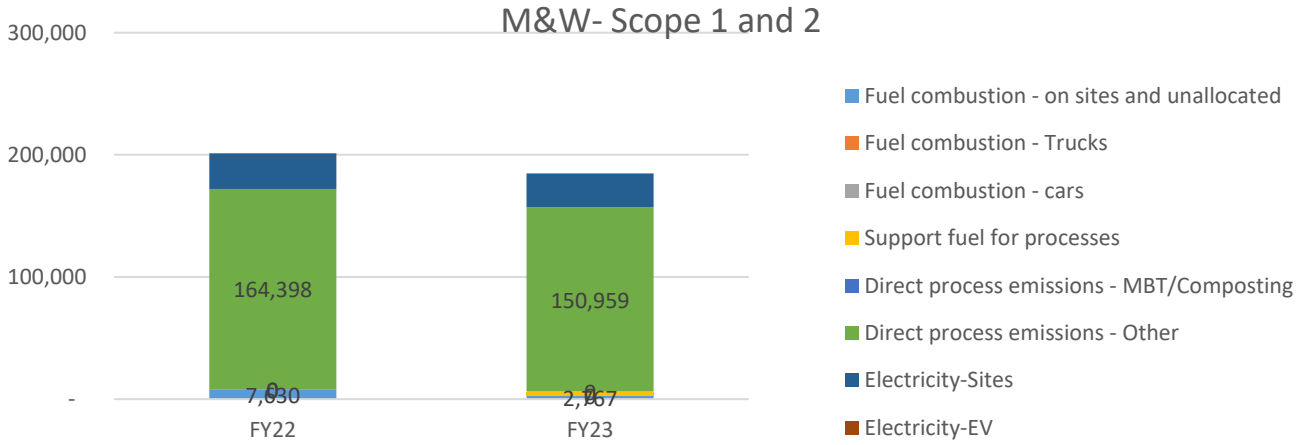
The electricity used for cars is not significant at the moment. Yet, we are now not able to distinguish the charging of EV trucks on site from total site usage. As our EV trucks fleet will grow, we will look into carving out a third application category (resulting in: Electricity-site use, electricity-truck use, and electricity-car use).
In the coming years, we expect a strong decrease in the corresponding CO_2 emissions associated with greening with electricity from Dutch solar and wind production – either further securing green origin certificates, or developing partnerships with local 3rd parties. We might also consider expanding own provision of electricity (see: Maltha's recent expansion of the PV infrastructure on its site in Portugal).

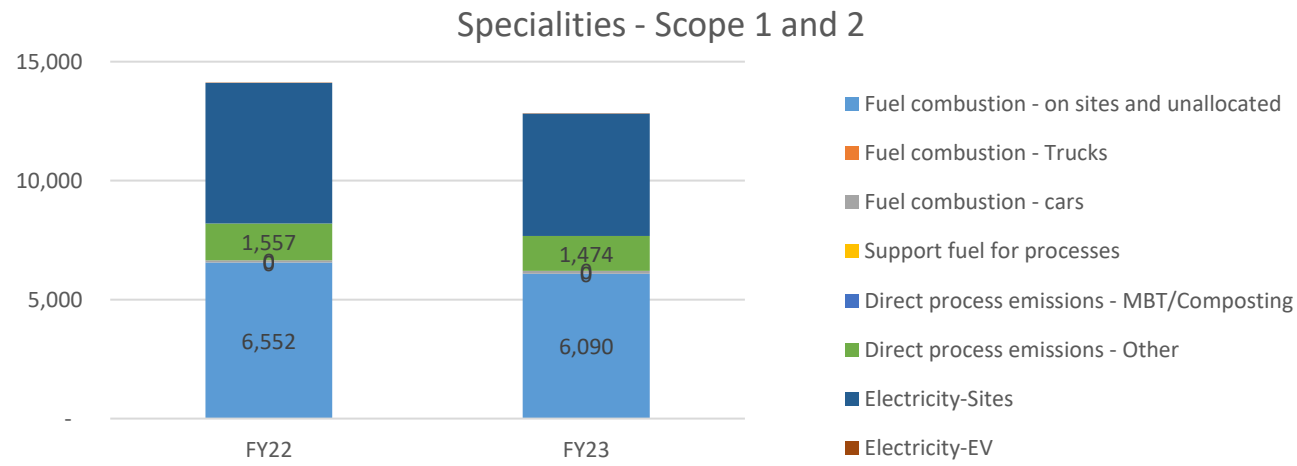
Emissions from fuel consumption of leased passenger cars have again started to increase after the drop caused by Covid-19. However, the electrification of the lease fleet is progressing and if the travel demand remains on a similar level, we are expecting gradual drop in the fuel usage and emissions. Due to diesel consumption trucks, diesel consumption on site also decreased significantly. Air traffic and commuter traffic are included in scope 3 and are not discussed further here due to low overall significance. Please find more detail on all Scope 3 categories in the auditor's report attached and Renewi's CDP disclosure.

For the sake of completeness, the Carbon Footprints for the entire Renewi Netherlands Holding BV and the 3 different divisions for the years FY22 – FY23 are visually displayed below, so that the differences between the years become clear.



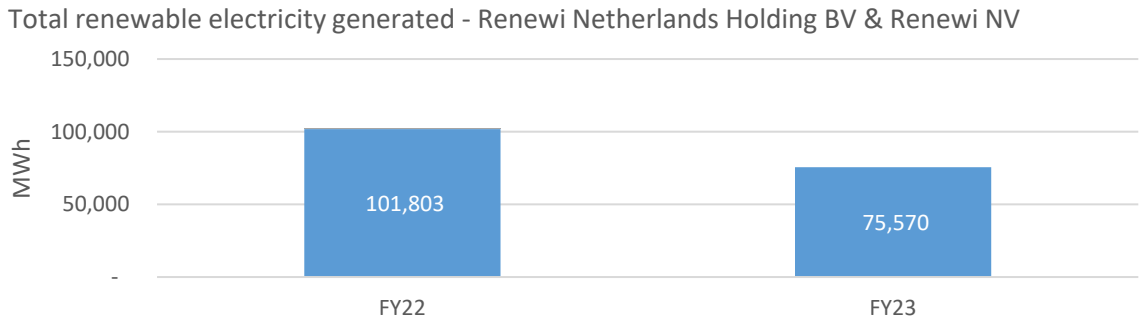

CW BE - Scope 1 and 2
150,000
100,000
50,000
-
95,247
2,802
25,976
14,234
76,161
2,209
23,783
7,387
FY22
FY23
Fuel combustion - on sites and unallocated
Fuel combustion - Trucks
Fuel combustion - cars
Support fuel for processes
Direct process emissions - MBT/Composting
Direct process emissions - Other
Electricity-Sites


M&W- Scope 1 and 2
300,000
200,000
100,000
-
164,398
7,030
150,959
FY22
FY23
Fuel combustion - on sites and unallocated
Fuel combustion - Trucks
Fuel combustion - cars
Support fuel for processes
Direct process emissions - MBT/Composting
Direct process emissions - Other
Electricity-Sites
Electricity-EV

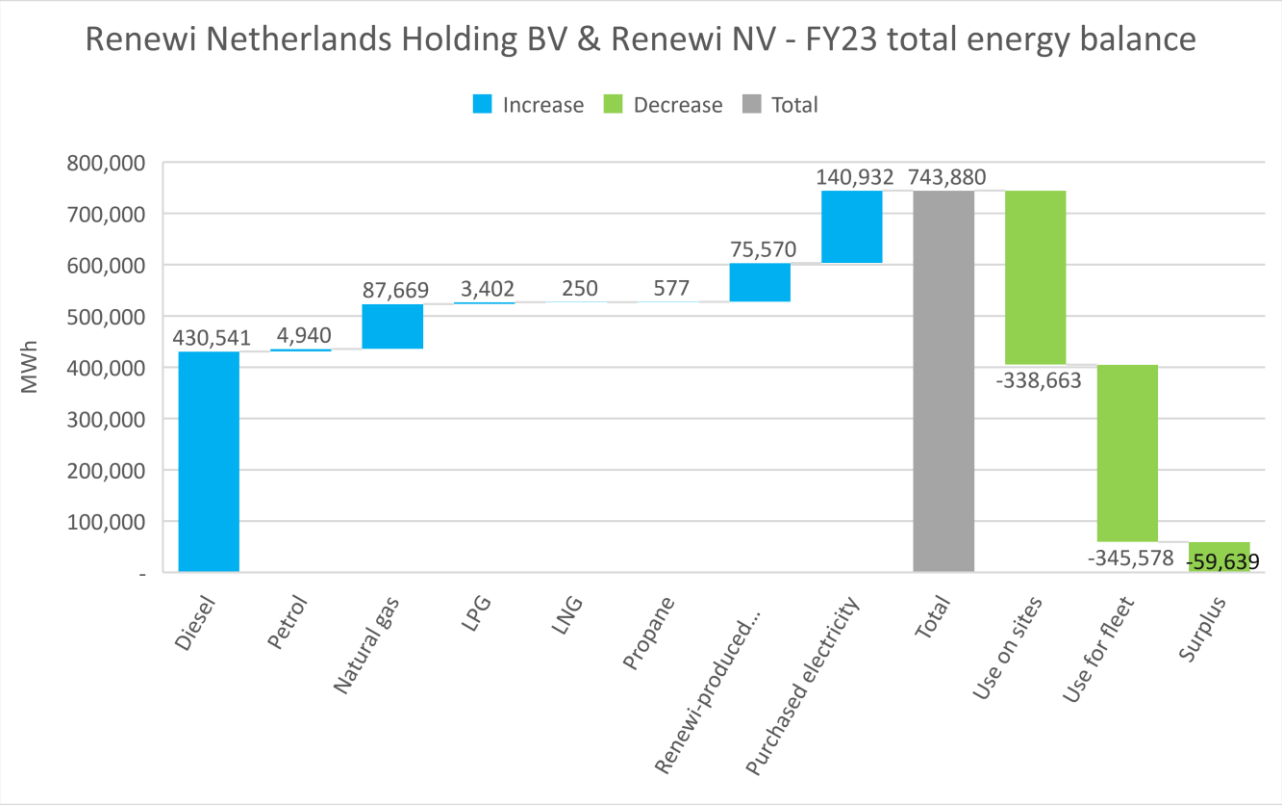

Specialities - Scope 1 and 2
15,000
10,000
5,000
-
1,557
6,552
1,474
6,090
FY22
FY23
Fuel combustion - on sites and unallocated
Fuel combustion - Trucks
Fuel combustion - cars
Support fuel for processes
Direct process emissions - MBT/Composting
Direct process emissions - Other
Electricity-Sites
Electricity-EV

2.3 | Energy analysis

In the recent reporting, we have acknowledged the rules of reporting on energy origins whereby the electricity produced by the 3rd party on the land/surface owned by Renewi cannot be recorded as Renewi-produced electricity. This stems from the fact that it's that 3rd party who owns the rights to green origin certificates, not Renewi. This triggered a downward correction in the FY23 vs FY22 despite continuous efforts to increase the local supply of generation capacity.



Renewi obtains its energy from a mix of green and grey sources as shown in the chart below.
The largest source of energy remains diesel. In parallel, a large part of our processes runs on the energy produced locally (mostly: landfill gas from our CHP engines).
Note: CHP heat in not at the moment separated out from the total yield of the installations and reported jointly as "Renewi-produced electricity".
Additionally, not included on the chart, is the production of biogas sold as fuel by CW NL to our partners for bio-LNG production. This amounts to 4,786,949 m^3 biogas.
Within CW BE the decrease of energy generated (from 40 414 to 28 243 MWh) derives from the temporary scaling down of activities of the two sites which use CHP – they were offline due to maintenance.



The significant energy carriers identified are listed in the two tables below per emission scope. Emissions from direct energy consumption fall under scope 1. Emissions from indirect energy consumption fall under scope 2. In addition, there are scope 3 emissions that take place in the chain. This includes business air travel and commuting by private car or public transport (and now many other categories calculated as per GHG Protocol since FY22, which are however not discussed in this document). It is indicated per division which energy carriers are applicable and in what way. In addition, the consumption per energy carrier is further explained.

Scope 1

Energy carrier	Commercial Waste NL	Mineralz & Water	Specialities	CW BE
Diesel trucks	Freight transport Internal transport, equipment, and processes	***na***	***na***	Freight transport Internal transport, equipment, and processes
Diesel on site		Internal transport, equipment, and processes	Internal transport, equipment, and processes	
Fuel passenger cars	Diesel, petrol, LPG, and electricity	Diesel, petrol, LPG, and electricity	Diesel, petrol, LPG, and electricity	Diesel, petrol, LPG, and electricity
Gas	Heating locations	Heating locations and use in processes	Heating locations and use in processes	Heating locations & drying process

Scope 2

Energy carrier	Commercial Waste NL	Mineralz & Water	Specialities	CW BE

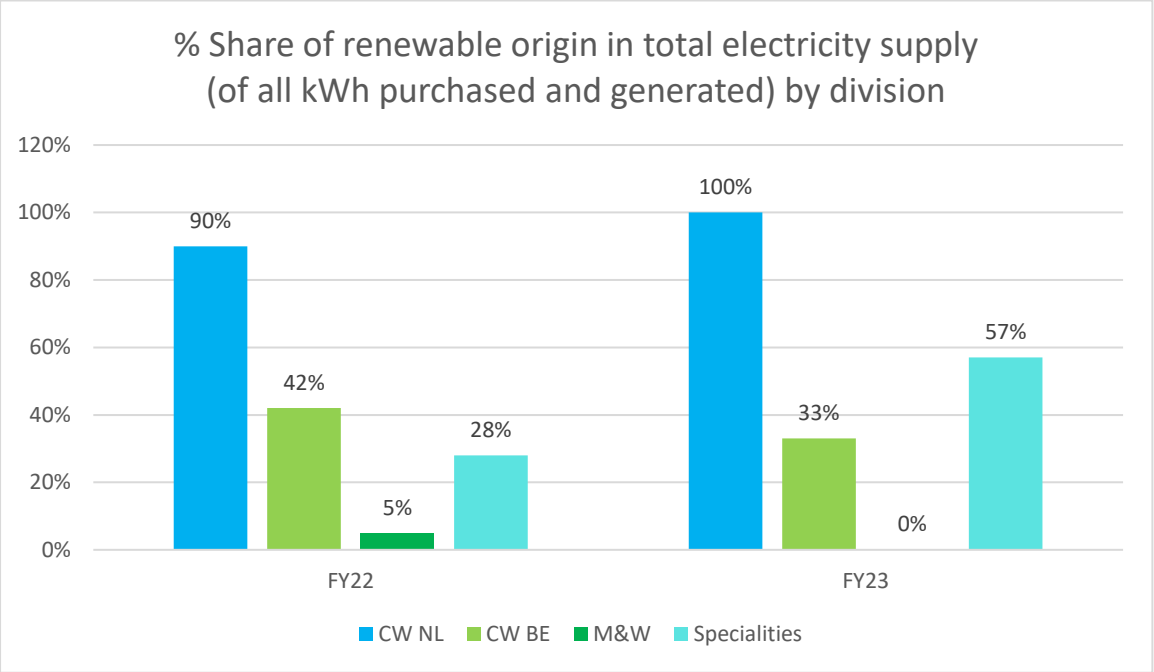
Electricity on site	Offices, lighting, and installations	Offices, lighting, and installations	Offices, lighting, and installations	Offices, lighting, and installations
Electricity transport	Lease car staff	Lease car staff	Lease car staff	Lease car staff

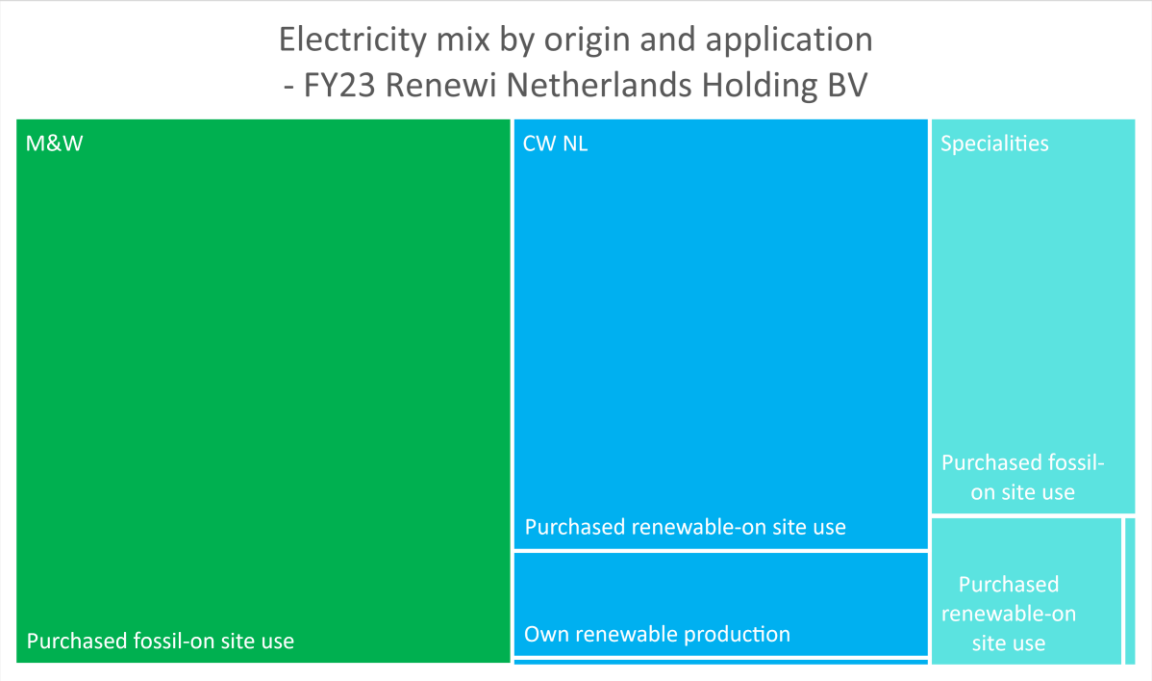
Scope 3

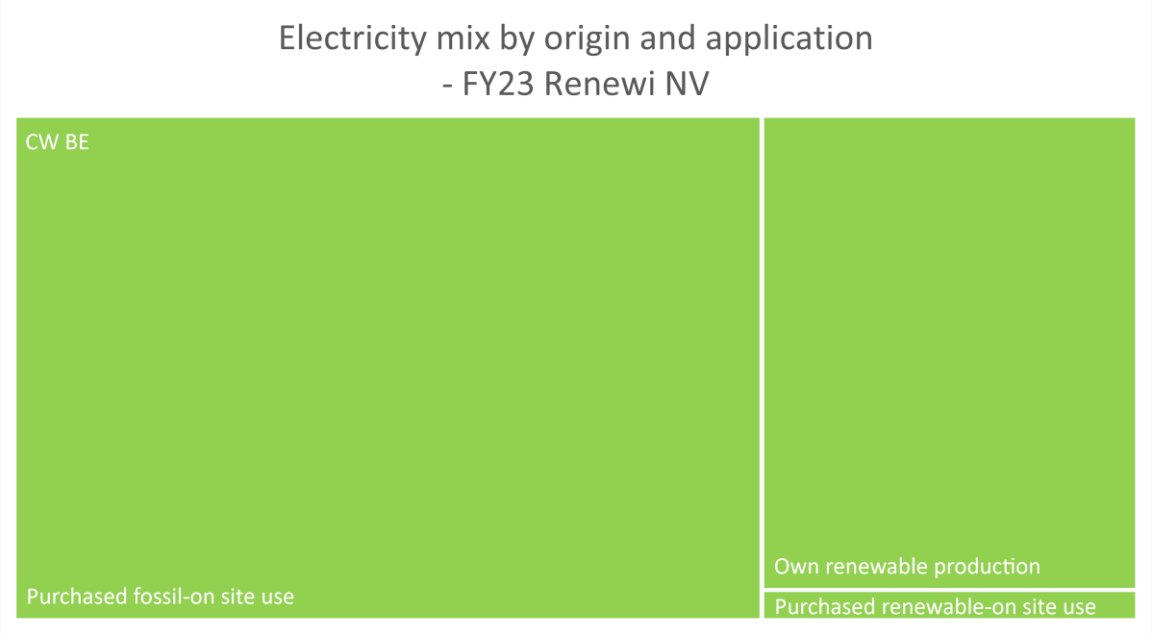
Energy carrier	**Commercial Waste NL**	**Mineralz & Water**	**Specialities**	**CW BE**
Air travel	Meetings at foreign locations	Meetings at foreign locations	Meetings at foreign locations	Meetings at foreign locations
Business use of private cars and public transport	commuting	commuting	commuting	commuting

A critical perspective to the energy supply of Renewi is the extent to which it has been provided from the non-fossil sources. For electricity consumption, the share of electricity used on sites has increased from 36% in FY22 to 41% in FY23.

A division-level breakdown of green and grey energy on site visible below:




Electricity mix by origin and application
- FY23 Renewi Netherlands Holding BV
M&W
Purchased fossil-on site use
CW NL
Purchased renewable-on site use
Own renewable production
Specialities
Purchased fossil-on site use
Purchased renewable-on site use


Electricity mix by origin and application
- FY23 Renewi NV
CW BE
Purchased fossil-on site use
Own renewable production
Purchased renewable-on site use

2.4 | Initiatives undertaken to decrease the emissions and energy consumption and their progress

Factors that can influence energy consumption

Minimizing emissions from energy consumption can happen either through leveraging the different energy mix (shift towards less carbon-intensive and renewable sources) or implementing energy efficiency and sobriety measures. Renewi aims to become 100% renewable electricity - based by 2030. However, not operating in the vacuum, Renewi has to be aware of factors that influence consumption/emission. They are listed in the table below for each energy carrier and the process emissions.

Energy flows	Factors
Direct process emissions	Quantity and composition of incoming waste, process efficiency, how much energy generated by waste
diesel trucks	Amount of waste transported, quantity and location of customers (routes), type of vehicle (diesel vs electric, engine efficiency), driving behavior of drivers
Diesel on site	Type of equipment (efficiency of engine and energy source: diesel vs. electricity), efficiency of internal transport movements, amount and composition of incoming and outgoing waste, degree of processing/recycling on site
Diesel passenger cars	Organization of work (via telephone, MS Teams or meeting in person, working from home), number of customers/stakeholders to be visited, distance between home and work, driving behavior of drivers
Gas on location	Use of gas in primary processes, insulation value of buildings, degree days, adjustment of heating
Electricity on site	Efficiency process, type of installation (efficiency motors), type of lighting, behavior of employees regarding the use of equipment and rooms
Air travel (business travel)	Organization of work (via telephone MS Teams or meeting in person, working from home), number of customers/stakeholders to be visited

It is important to distinguish between **absolute** energy consumption and process emissions and **relative** consumption and emissions. The absolute consumption and emissions are strongly related to the amount of waste that is transported and processed/recycled by the divisions. In general, the more processing/recycling, the more energy consumption or process emissions are released. Since one of the main business objectives of all three divisions is to process/recycle as much waste as possible and thus give it a second life as a secondary raw material, it is a natural tendency of business that the total energy consumption, process emissions and thus total CO_2 emissions will increase as the divisions succeed in their objectives. That is why the decoupling of processing capacity from energy demand remains a crucial challenge at Renewi.

Process emissions
An energy assessment has been made to get a clearer picture of these emissions and where to exert influence. This shows that of the process emissions only the process emissions at ATM (Mineralz & Water) can be positively influenced by process optimizations that improve energy efficiency. This was done in 2021 through the installation of a new air preheater (LUVO), which has led to a significant reduction in gas consumption. The processes at ATM consist of sludge treatment, water purification, pyrolysis, thermal cleaning, flue gas cleaning and ship cleaning/degassing. By means of pyrolysis, part of the processed material is converted into fuel, which is used on site to provide other combustion processes – as such, it is difficult to be optimized further. Nevertheless, a major gain in terms of emissions can still be achieved here by capturing the CO_2.- which is currently being evaluated.

No process optimization is possible at the Commercial Waste NL and Mineralz landfills and the diffuse landfill gas emissions from the landfill can only be used for electricity generation. Small process optimizations can be implemented in the fermentation processes and composting, but these will often not be reflected in the results. To provide better incentives for such optimization to happen, we are continuously evolving our measurement and accounting methods for better granularity.

Diesel trucks
The relative fuel consumption in the transports of Commercial Waste NL per ton of transported waste can be positively influenced by the purchase of new (EV or more efficient) vehicles, optimizing routes and the stimulation of more economical driving behaviour of drivers.
Commercial Waste NL's truck fleet consists of nearly 1300 trucks. In FY20, 60% of these trucks had a Euro 6 engine, which has since raised to 80%. EURO6 remains the highest standard of quality for trucks, and it will remain so until 2027 when EURO7 steps in place within the EU.
To build strong response to the regulation, Renewi is actively exploring and following developments in emission-free transport, such as trucks that use hydrogen or electricity as fuel. Electric trucks have been purchased for a few years now. These still represent only a small share (<1% of the fleet), but a ramp-up plan is being designed for the introduction of more EV trucks to contribute to the carbon reduction target that is set for 2030. Also, we are exploring alternative fuels such as bio-LNG (produced by Renewi Organics and Nordsol) and GTL – this is however still on an experimental scale, given the total size of our fleet demand.
Route optimization has been progressively implemented in the recent years, reducing the number of kilometers driven, therefore consumption.

Diesel on site
Diesel consumption on site can be positively influenced mainly by optimizing internal transport movements as well as investing in more efficient vehicles (among which, replacing equipment that runs on diesel with electric cranes and forklifts).

Fuel economy lease passenger cars
The fuel consumption of leased passenger cars can be positively influenced by drawing employees' attention to their driving behavior and promoting the use of alternative meeting resources such as MS Teams or working from home where possible. In addition, the organization can steer its lease policy towards more fuel-efficient and electric cars. Worth noting, that the use of electric cars only provides a significant advantage if they are charged with green electricity, so provisioning the sites with green energy is paramount to make sure this solution yields results.

Gas on site
Electricity consumption at locations has been identified as a significant theme within the EED audit in 2020 and therefore also included in action plans at location level. So far this mainly concerned the replacement of lighting and, where possible, energy efficiency of installations on location. Further, Renewi will have to investigate the methods of buildings heating and insulation, to evaluate the impact of buildings on unnecessary gas use. This is a part of the division-level roadmaps.
Gas consumption on location can also be reduced by optimizing primary processes in which gas is used.

Electricity on site
Electricity consumption on site can be positively influenced by optimizing primary processes in which electricity is used, such as sorting lines, baling presses and similar installations, and by making maximum use of energy-efficient lighting and equipment in buildings, halls, and offices. This as part of general energy care on location. This has been worked out at location level within the divisions in the context of the EED audits (European Energy Directive). These EED audits contain an action plan with energy saving actions to be implemented in the period 2020-2024.

Scope 3 - Air Travel

The degree of air travel can be positively influenced by organizing work arrangements with international teams via MS Teams instead of in person. This is already being done where possible, but due to the focus on integration, a lot of consultation is currently taking place in both the Netherlands and the United Kingdom, which makes air travel necessary. It is expected that this will decrease in the coming years when the various departments and systems from the former companies are integrated, and the divisions start to follow their own course. Since the contribution to the CO_2 footprint is negligible, no focus is currently being placed on this.

Scope 3 - Business travel - Business travel private cars, Public Transport and Taxi use
In 2019, a calculation was made to determine the CO_2 that are released in addition to air traffic. This is based on the reimbursed kilometers and declared public transport and taxi rides. This showed that the emissions are equal to 0.08% of the entire Renewi Netherlands Holding BV footprint of 2019. The emissions related to air travel make up 0.02% of the footprint. The total share of business travel is therefore 0.1% of the total footprint. This energy flow can therefore be regarded as insignificant and will therefore receive no further attention within the CO_2 management system for the time being.

Reduction plans

Renewi positions itself as a market leader in recycling, which remains its core business objective and the first pillar of strategy and answers the question “what we do”. “How we do it” is covered by the remaining two pillars of the strategy, among them: carbon footprint reduction – on sites and in fleet.

The ambition of Renewi is in line with the global objectives: to not exceed the 1.5*C warming of the planet. In 2022 the Divisions were requested to prepare and present the long-term plans for achieving the climate targets by 2030 (FY31). This requires 50% reduction in Scope 1 and 2, and 25% reduction in Scope 3. Interim target was set at FY25 for a 15% reduction vs FY22 baseline. We consider these targets in line with the guidance of the Science-Based Targets Initiative although they have not been verified by SBTI yet.

We are one of 12 companies globally in the “Solid waste management utilities” who committed to setting the short-term targets according to recent climate science.
Upon the approval of the targets above, we are expecting to join the further 26 players who already set it for 1.5*C, and 6 who are following a well-below 2*C pathway.
Only one of those committed to 1.5*C pathway in the long term and none yet for Net-Zero.10 have a Net-Zero commitment.
On this basis, we conclude that we are in line with the progress of the industry, and therefore, in terms of CO2 Prestatieladder, in “middle bracket” of the ambition level GHG-wise.

In order to achieve this, there is an ongoing project on the Group level to help coordinate the pace of change, making sure that all the reduction plans are adding up to common goals. This project is scheduled to run until February/March 2024. As a result, we will be able to communicate the holistic plan of carbon emissions reduction with adequate level of detail and budgeting and are intending to share this during the next CO2 Prestatieladder review cycle.

First idea solutions revolve around:
- the decrease of fuel use and electrification of fleet,
- energy efficiency,
- energy sobriety,
- PV/wind/storage installation,
- Futher optimizing processes on site,
- Carbon capture.

Renewi plc has included a number of targets with regard to energy and fuel consumption for 2025 in its Sustainability Strategy.

During the past CO2 Prestatieladder audits, measurement data for the CO2 reduction targets deviated from the sustainability report for Renewi as a whole, to force-fit into the CO2 Prestatieladder framework. As Renewi is increasingly calibrating its performance to international, rather than local standards, we will from now on report to the same targets as those set to match the Science-Based Targets Initiative and those published in the Group disclosures (Annual Report, Sustainability Review), annually.

To-date, 2017 was considered as the base year for the CO2 management system. This is no longer the case. After the restatement done by Renewi on its FY22, we addressed some structural data problems lingering on since the founding merger and gained site-level granularity of the data, which we can continue building on.
As the level of maturity increases, we will be refining our data across scope 1, scope 2 and (where we currently have the most volatility) Scope 3 – these improvements will be communicated regularly as a standard part of the explanation of results.

The governance mechanism to deliver these targets is discussed in the second part of the report.

Archival results

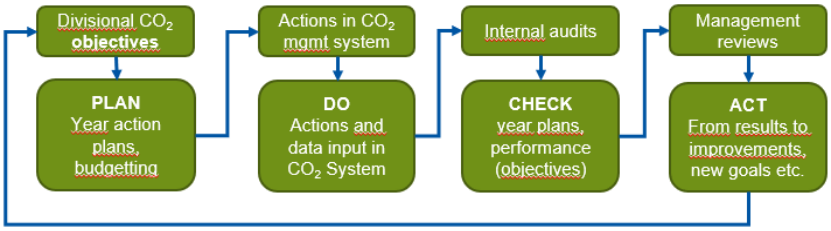
The overview below shows the reduction targets under the previous reduction campaign (2017-2021). While some of these initiatives continue or have transpired to business as usual, We are currently re-setting our ambitions much higher, to stay in line with the SBTI for the 2022-2030 horizon. Including the table for historical continuity.
Given the unclear explanations between the year 2021 and 2022, it becomes clear that the level of traceability and scrutiny was not sufficient throughout these projects to ensure timely delivery and a scale that would correspond to the criticality of climate change. This is a lesson learned for the next planning cycle.

Actions and targets against 2017 baseline with a horizon to 2021

Goal	Measure	Objective	Time planning	Responsible	Result 2021	Progress 2022
1.1	Energy efficiency project ATM (Mineralz & Water)	-5%	2018 – 2021	Project team energy efficiency	+26.8%	Improvements have been realized in the 2021 stop.
1 .2	Route optimization Commercial Waste NL	-5%	2018 - 2021	Integration Project Team	-1.6%	Rolled out for all services and across the entire division.
	Replacement trucks Commercial Waste NL – 100% EURO6 in 2025		2018 - 2021	Category Manager Group Procurement		67% fleet was Euro 6 first half 2022
1.3	Internal transport efficiency at locations	-5%	2018 - 2021	CI project team Specialities	-9.3%	Various projects carried out at Maltha /Coolrec and on CW NL sites
2.1.	Implement EED measures within Commercial Waste NL	-6% CW NL	2017 - 2020	MD Commercial Waste NL	-7.6% CW NL	Partly implemented. Renewed attention in the period 2020-2024
and 2.3	and Specialities	-1% Specialities	2017 - 2020	MDs Specialities	-11.2% Specialities	Partly implemented. Renewed attention in the period 2020-2024
2.4	Production and purchase of solar/wind energy at locations	-10%	Ongoing	Managers Real Estate and Procurement	-9%	Currently, 11 locations within the scope of the CO_2 PL are equipped with solar roofs
	Purchasing green electricity in accordance with requirements for the CO_2 Performance Ladder		2019-2020	Category Manager Group Procurement		CW NL and Coolrec NL currently purchase electricity completely green, but not in accordance with CO_2 PL requirements.
3.1.	FORZ® aggregates to concrete producers according to plan	Not set	2018 to 2021	Manager FORZ		Objective not achieved – FORZ sales stopped in 2021
3.2.	Provide peel pioneers with the agreed number of peels	5 tons	2018 to 2021	Outlet manager Organic waste streams	**5 tons (target: 5 tons)**	Target not met due to Covid. The aim is to achieve the target by 2023
3.3	Provide return mattress with the necessary mattresses	To be determined	2019 to 2024	To be determined		To be filled in further

3 | Management system

Renewi does not hold a separate management system for its monitoring and governance of energy and carbon footprint. Both are parts of the same strategic objective and are therefore addressed by the common process.



The process is further elaborated in the Scope 1 and 2 reporting manual. The table below helps mapping the CO_2 Prestatieladder's steps and requirements to Renewi environment.

	Frequency	Moment in year	Group Sust. Reporting	Sust. Managers divisions	Division' s Managing Directors	Communicatio ns department
Insight						
Collect emission and energy inventory data	semi-annually	Oct/April.		X		
Peer review on emission and energy inventory	semi-annually	Nov/May	X			
Prepare emission and energy inventory report and insights	semi-annually	Nov/May	X	X		
Approval of emission and energy inventory	semi-annually	Nov/May		X		
Reduction						
Adjust and approve CO_2 reduction targets	5-yearly	June	X		X	
Drawing up energy and CO2 management plan	5-yearly,annual calibration	July/Aug		X		
Determine CO_2 reduction measures	annually	June		X		
Approve CO_2 measures	annual	July/Aug			X	
Progress report	Semi-annually	Nov/May	X	X		
Communication						
Delivery of news items (internal/external)	continuous					X
Update website	semi-annually	Jun./Dec.	X			
Update SKAO website page	annual	Sept	X			
Internal/external communication ad hoc	continuous					X
Internal communication narrowcasting + actua	semi-annually	Jun./Dec.	X			X
External communication website + news	semi-annually	Jun./Dec.	X			X
Participation						
Inventory of potentially relevant initiatives	semi-annually	Jun/Dec.	X	X		
Decision on participation/continuation of initiatives	continuous				X	
Other						
Comply with CO_2 Performance Ladder requirements	continuous		X	X	X	X
Final editing CO_2 dossier	annual	Sept	X	X		
Internal audit CO_2 management system	semi-annually	Jun./Dec.	X			
Management review	annually	July			X	
Report results to management	semi-annually	Jun./Dec.	X	X		
Organize/execute external audit	annual (BDO and SKAO)	Feb-April/Oct.	X			

3.1 | Evaluation of the data quality management (Insight)

CO2 Prestatieladder requires that the CO2 management system meets the criteria of ISO-14064-1. All the quality-related mechanisms and controls have been described in the document: *20230623 SUSTAINABILITY REPORTING MANUAL - GHG Scope 1+2 FINAL_BDO.pdf.*
The below chapter describes how the data quality management is addressed to meet the ISO14001 and ISO50001 requirements.

Further details can be traced in the document *2023-10-Criteria index - internal audit.xlsx*

Outcomes of the internal system audits

In this CO2 Prestatieladder cycle, we would like to present the outcomes of that audit in place of the internal audit.
At the same time, we are reorganizing the roles around management and controlling of non-financial reporting as a whole, given the increased responsibility of finance-related teams over non-financial data, as an effect of the accounting rigor introduced by the upcoming CSRD regulation.
We are also pursuing opportunities to automate certain sections of data collection, to minimize the risk of data mishandling through the re-population of multiple excel sheets.
As a result, in the next CO2Prestatieladder cycle we expect to have further clarity on how the roles and responsibilities will be divided around:

- The preparation of data
- Internal quality control on data before the internal announcement of results
- Internal quality control on the methods and the conclusions drawn
- Preparation to the external audit and managing the process with external auditor in the run-up to the Annual Report publication

Additionally, the Sustainability Team and its closest stakeholders identified the following points of improvement:

1. Not enough urgency was placed on the development of the carbon reduction plans.
   In line with the new sustainability objectives by 2030 (goal of -50% carbon reduction ambition of scope 1&2 between 2022 and 2030 and 25% of scope 3), Renewi team has expected to develop division-specific carbon reduction 5-year plans
   However, this project is now delayed, and revised deadline predicts the completed aggregation on Group level around February 2024. As these plans are being drawn, the local initiatives still proliferate, though their cumulative impact is not sufficiently quantified.

2. Despite local initiatives to provide greener electricity, more top-level overview of energy demands of Renewi across all the energy forms is awaited from the Group Functions.

3. Furhter enablement of middle-managers with data is required and expected, on two fronts:
   - > More granular dashboarding
   -> Integration of the original sources of data into central cloud-based data platform

Outcomes of the external system audits

In the end of FY23 for the first time Renewi has carried out a limited assurance audit on its Scope 1 and Scope 2 accounting methods and results. This was directly enabled by the recalculation of baseline year FY22 performed between July 2022 and January 2023 and the development of methodology that allows for GHG Protocol alignment and improvement of granularity all the way to the site level.

Conclusions from the FY22 and FY23 limited assurance carried out by BDO International Limited (www.bdo.global) include the following key observations and proposed improvements (as interpreted by the Renewi team):

4. Majority of the discrepancies found were due to post-date adjustments of data in the source systems, **Action point:** further automation of the systems and shortening the time lead between data collection and audit will help reducing this risk.
5. During the audit of FY22 Renewi team has improved the controls and granularity of the operational control on site-level.
   Action point: Further work was recommended to gain similar level of insight on an an equipment/data point level
6. Renewi reported an exclusion of refrigerants due to their low significance to the overall business and high cost of obtaining the data relative to environmental gains.
   Action point: This could be rectified in the future.

3.2 | Evaluation of information distribution system (Transparency)

The system setup:

For the input of the management review, reference is made to the following documents:

- Operational control document:
  [as of 20230824] SCOPE 1and2 - OPS control Carbon accounting - ALL RENEWI MASTER.xlsx
- Reporting manual: *20230623 SUSTAINABILITY REPORTING MANUAL - GHG Scope 1+2 FINAL_BDO.pdf*
- *Renewi Methodology Actions and Areas for Improvement June 23 140623 RESPONSE.pdf*
- *FY23 Scope 3 completeness and quality report_CO2PL.pdf*

These documents describe the CO_2 management system in detail and are managed by the Group Sustainability Reporting Lead.
The management has been informed of the content of the above documents and of the complete file and endorses this content.

Stakeholder management and analysis

Communication around climate-related progress is a firm component of Renewi's communication, but more importantly-action. Yet, various interest groups will be able to offer broad range of scrutiny subject and will each require individual approach in communication.

The last full materiality analysis and stakeholder interviewing campaign was carried out (as per GRI guidance) in 2019. This is the list of stakeholders we are currently working with:

External stakeholders	Importance of CO2 policy & knowledge level
Shareholders	Shareholders attach great importance to the CSR of the organizations in which they invest and therefore direct these organizations towards a proactive and progressive CSR policy, which also pays attention to CO2 and energy. The attractiveness of Renewi towards investors is also determined by the credit ratings of external agencies, such as S&P. These ratings increasingly integrate ESG, and therefore CO2 performance, into the core evaluation criteria
Clients	Many of the customers of Renewi Netherlands Holding BV have their own CSR policy and objectives and responsible and sustainable waste processing plays a role in this, including CO2 impact as a theme.
Local authorities	require organizations to take energy efficiency into account based on EED regulations and environmental permits. Benefit from energy-efficient organizations. In addition, many of these authorities are also our customers

	for local household waste collection and in that capacity municipalities sometimes require a CO2 performance ladder certificate.
Citizens (local residents)	Today, every citizen benefits from proper waste collection in a sustainable manner. Society's call for companies to conduct corporate social responsibility and pay attention to the climate issue demands that we pay attention to this.
NGO's	NGOs are often driven by environmental and sustainability issues such as the climate issue and will therefore put pressure on companies like ours to formulate policies and take measures on CO2 and energy, among other things.
The waste sector	Within the Dutch sector, cooperation is expressly sought in order to form a united front as a sector. This also applies to the theme of CO2 and Energy. This is done, for example, to influence government policy in this area. Renewi sees itself as one of the leaders in this and wants to demonstrate this within the sector.
Suppliers and customers (the value chain)	Within the value chain, more and more attention is being paid to the CO2 impact of production, logistics, use and (circular) processing of products (and services). Renewi expressly seeks cooperation with suppliers and processors of waste with the aim of, among other things, positively influencing the CO2 impact.

As a part of preparations to reach CSRD compliance with double materiality assessment, Renewi will refresh the stakeholders analysis and materiality mapping this autumn/winter. We expect to share the results of this activity in the next audit cycle.

In the meantime, we remain in touch with the Renewi business network and "hold the ear to the ground". Various points for attention emerged from the discussions with the stakeholders. These are included in the improvements to the CO_2 reduction system. The main points of interest are:

- Is Renewi making sufficient progress in implementing innovative initiatives/control measures to reduce the CO2 emissions of the fleet?
- Renewi should pay more attention to the theme of sustainable mobility
- Renewi must provide insight into the CO_2 impact in the chain of 'more sustainable' processing methods
- Renewi must formulate or explicitly communicate the Energy/CO_2 policy and put it into practice by means of a PDCA cycle

The divisions recognize the above points for attention and also see that various initiatives are underway within all divisions that have a positive impact on those points for attention. For example, since 2020, the organization has taken concrete steps to deploy more electric and LNG trucks and electrical equipment on location. In addition, in the field of mobility, working at home/remotely and electric driving has been promoted. Thirdly, the organization is continuously working on providing better insight into its CO2 impact as a result of its operations, through initiatives such as the updating of the CO_2 key figures in collaboration with TNO. Work is also being done on improving the quality and timeliness of internal reports and, in connection therewith, a better management cycle.

You can find more detail on each of these communication vehicles in the annex 1 to this document.

Distribution of information:

Input :

- All documents in folder C Transparantie

Internally:

Internal stakeholders are

- The employees
- and the leadership teams of the three divisions within Renewi Netherlands Holding BV
- and the larger organization Renewi PLC, specifically the Board of Directors and Executive Committee.

Employees will all be kept informed via news items on the intranet, via mailing, narrowcasting screens in the canteens and internal news magazines of the companies.
Since 2021, 2 internal LIVE sessions are organized in April & November. These events allow us to give the latest update on Mission 75. Renewi's business ambition to increase its recycling rate up to 75% and increase the quality of its Recyclates. This enable us to have a huge reach within the company as these LIVE sessions are broadcasted in 3 languages (French, Dutch, English). As per 2022, the topic of sustainability has been added to this "now famous or well-known communication channel", and performance on CO2 is also presented, explained and tracked. Renewi community is also animated through dedicated sub-page on sharepoint (under construction, currently a working prototype) and on the social platform Yammer, via posts from the Sustainability colleagues.

Sustainability Core Team (consisting of the Group Sustainability Manager, Reporting Leader, Strategy Director and Division Sustanability. leaders) are meeting monthly for a project-related update, discussting reporting needs, progress, and in a separate session, addressing any complex improvements together, seeking shared insights.

The Executive Committee and Board of Directors, together with the Managing directors of the divisions, are also be involved in the decision-making of the reduction measures to be taken, the progress of the CO2 reduction targets and other key aspects of the CO2 reduction policy.
Since Q4-2021, The Executive committee receives monthly an update on the sustainability results and performance of Renewi PLC. In January 2022, the topic of carbon footprint was brought and several actions will emerge in 2024 to build specific reduction roadmap.
The below management report should be circulated through Group Sustainability Reporting Lead and Sustainability Managers in the Divisions to the Managing Directors, Strategy and Business Development Director and Financial Controller.
On the basis of information shared, the Management should mobilize adequate resources to support the realization of carbon reduction which is one of Renewi's strategic objectives.

As per 2022, **the leadership teams of the 3 divisions** has started discussing and reviewing key sustainability KPIs. The Carbon emission KPI is added in these monthly or quarterly updates.

Division Leaders are responsible for distributing and preparing additional cuts of data to support the decision making in the divisions. Progress of the initiatives should be reported periodically (at minimum 2x year) as a supplement to the interpretation of the CO2 footprint results.

As is, there has been little evidence of communication collected by the team. This could be one area of improvement for FY24. Both the frequency or reachouts, as well as storytelling around the results, could be improved. This is expected within the next few months with the activation of Sustainability sharepoint and production of new dashboards, allowing for the creation of infographics.

Externally (general public and government):

The main external communication channel about Sustainability and CO2 policy at Renewi PLC group level remains the Renewi Netherlands website and the Annual Financial Report and Sustainability Review, published annually. These can be viewed via the websites www.renewi.nl and https://www.renewi.com/en/investors/investor-relations/reports-and-presentations (in English).

Further, Various documents within the CO2 performance ladder have recently been placed on Renewi's website. After certification, a number of documents will also be placed on the SKAO website. The organization must ensure that these documents and the website are kept up to date.

We are communicating ad-hoc about relevant initiatives and publish press releases as and when required. The communications department is in charge of the publication agenda and content, while Sustainability colleagues offer advisory capacity to help prepare messaging

Renewi also engages in external mailing and often also via direct contact with the relevant stakeholders, through meetings and site visits.
Since 2021, Renewi started the organization of 4 LIVE streams events where our customers are invited to join and hear about our latest innovation projects and latest challenges. These 4 LIVE events take place in April and in November. They last 2 hours. They are broadcasted live in 3 languages: English, French & Dutch. Doing that enables us to reach out to many (new/not new) customers and engage them in our ambitions to do things better.

Renewi is also a vocal supporter of regulation that supports circular economy. Primary area of activity is Netherlands, given that the majority of business resides in this country. One of example initiatives is The LCA Committee of the Dutch Waste Management Association, aimed at influencing Dutch Waste Management Association about the creation of a Zero Waste CO2 tool. Details about our involvement with industry associations and similar interest groups can be found in the most recent CDP disclosure.

Externally (ESG and standards):

The information needs of investors, think-tanks and NGOs who monitor the corporate sustainability, are further addressed by the pursuit of ESG ratings and voluntary disclosures. For example, in 2022:

- Renewi maintained its membership in the FTSE4GOOD index
- Progressed its followship of UN Global Compact principles, from “Learner” to “Advanced” status (Renewi PLC | UN Global Compact)
- Improved the quality of Renewi climate- and energy-related reporting by progressing from D to C at CDP Climate Change Disclosures (CDP website)

Renewi has committed to set SBTI targets within the next 2 years.
TCFD alignment is deepened every year within the main document of Annual Report.
Together with the GRI and UNGC disclosures, these constitute a foundation for our annual communication on climate impacts.

Periodically, we might consider more hands-on involvement with one of the ESG raters who are monitoring us: eg. S&P, MSCI, ISS, FTSE4Good.
While our main approach is to provide top-class data in the AR and SR and then let the raters use this information without our further involvement, we have historically made and exception for S&P. Ratings scrutinize us on the energy and CO_2 policy among other subjects and provide external calibration for the organization’s management on the non-financial aspects.

On 4th August 2023 we renewed our green sustainability- linked Revolving Credit Facility where pricing is also linked to positive outcomes against 3 KPIs: Recycling rate, Scope 1 & 2 carbon emissions and Lost Time Injuries Rate. All of which have to be third party limited assured. This also allows us to re-examine and improve our control systems.

3.3 | Evaluation of the reduction governance (Participation and Reduction)

Input:

- 6.2.D. Participatie Sector- en Keteninitiatieven Renewi Netherlands Holding BV 2020 - FY 2023_ENG.pdf

As an integral part of Renewi strategy, we continue cultivating the collaboration both within the value chain as well as by collaborating within the broader sector. To do this, we have to nurture the same mindset in-house.

Internal reduction work
In the past year, key focus was placed on the improvements of the quality of reporting, to achieve the granularity that corresponds with modern standards of reporting and enables more decision making on the ground and more frequent monitoring. Improved sharing of information (down to the site level) should be an ally in spreading the ownership for the reduction results further towards the frontlines of the organization.

Now that the data layer is much more satisfying, the internal sustainability team can focus more on the implementation of reductions. This happens through:

- Cultivating the continuous improvements mindset in the context of emissions management
- Educating on the tools needed to achieve reductions (eg. the training on circular economy, BOOST programme for innovations internally)
- Carbon reduction objectives start to be included in the performance objectives of key managers.
- Hiring of new colleagues in two key divisions who are responsible primarily for improving the data and reporting, to release the time of Sustainability Managers to scale action.
- Further, at the Group level, we have assigned 2 colleagues for 6 months on an 1.5 FTE-basis support to help coordinate the collective impact of all fragmented decarbonization initiatives from across Renewi, find synergies to scale them, and to recalibrate with the overall Renewi level of ambition. The result of this assignment will be seen in the next audit cycle with the completion of carbon reduction roadmap.

Throughout FY24 we are also working further to embed the responsibility for results further in the functional teams within Group Support – for example, working closely with Procurement around improving supply chain transparency.
From the governance perspective, we can conclude that this objective has now received the attention and scale it needed and if we can keep this or even higher level of buy-in, we should be able to progress well towards net zero.

The 1st draft of the new governance system around delivering the reduction of initiatives has been shared with the auditors during the audit and therefore not included in this report.

External collaboration for reduction
The inventory of our sector-wide or value-chain specific initiatives can be found in document *6.2.D. Participatie Sector- en Keteninitiatieven Renewi Netherlands Holding BV 2020 - FY 2023_ENG.pdf*.

The following changes that can be observed between 2021/2022 and currently reported FY23:

- Codification of the meaning of innovation at Renewi and improved monitoring of the outcomes of innovative projects with our value chain partners (new, more detailed methodology roll-out for the Innovative Materials KPI)
- Strengthening the recognition of GHG management as one of strategic tasks of Renewi and following the industry's best practices (preparation of SBTI targets, return to regular disclosure to CDP)
- Increased number of chain initiatives, all aimed at more recycling and, as a consequence, more avoided emissions. A specific break-through in the recognition and rising trust in the use of secondary materials, are the collaborations which use recycled plastics in the production of kids' toys and fridge liners. Both toys and food application production come with severe quality and hygiene rules and are known to be difficult to enter cycles for recycled material.

Yet it is recognized internally that meaningful reductions in GHG emissions across the products' lifecycle can only be achieved through collaborative effort. Therefore, it is advised to the management to continue strengthening the innovation portfolio and support strides to assess the CO_2 footprint on product and/or project level.

3.3 | Process improvement plan for the upcoming year

FY23/FY24 actions
The PDCA cycle requires a revisit of the progress since the previous audit. Below table shows the improvement objectives from the previous cycle and their current status.

CHECK:

Action	Responsible	Expiry date	Status
1. Align the new sustainability objectives of the organization with this energy and CO2 reduction policy.	Head of Sustainability and Divisional Sust. leads	31-03-2024	Complete – Renewi has adopted carbon reduction as a strategic objective
2. Resolve internal audit discrepancies	Head of Sustainability	04-01-2023	Reconciled
3. Integrate (new entities) in Energy and CO2 management system divisions.	Group Sust. Reporting Lead + Divisional Sustainability Leads	6/30/2023	Successful integration of Paro.
4. Improving data management (system) for Energy and CO2 data at location level	Head of Sustainability + Group sustainability reporting lead	3/31/2023	PENDING: big strides made by the divisions, yet further work on site-level accuracy continues

ACT:
In order to deliver on the last improvement objective, the sustainability team applied for a budget to help automate the data quality control on site-level via PowerApps. Alternatively, extra resources have to be mobilized to cover this part of improvements.

PLAN:
In the year review period, the Sustainability Reporting Team (Group Leader and Division Leaders) determined several improvement points to implement during FY24 as part of continuous improvement of the methodology. Full list of improvements being considered has been shared with the auditors.
Further, based on this management review and team's own observations, the following actions for the improvement of the CO2 management system and the associated objectives have been determined by the Group Sustainability Reporting Lead and Group Sustainability Reporting Manager.

The most critical of these improvements are listed in the table below and will be monitored for completion within the next 1-2 audit cycles. The management and/or management representatives

of the three Commercial NL, Mineralz & Water and Specialities divisions should ensure that these actions are carried out within the set deadlines.

Action	Responsible	Expiry date	Status
5. Advance to higher quality accounting methods on process emissions on installation-level basis	Group Sust. Reporting Lead and Divisional Sust. leads	31-03-2024	In progress
6. Resolve internal audit governance under new CSRD reality	Group Sust. Reporting Manager, Financial Controller, Strategy Director	01-02-2024 (Ideally before H1 FY24 reporting, but no later than end of Financial Year)	In progress
7. Improve energy management systems and integrate into Group level governance	Group Sust. Reporting Lead + Divisional Sustainability Leads	31-03-2024	Not started
8. Harmonize the communication of outcomes by e.g. providing standardized data cuts, charts, furthering the critical analysis of results, and/or interactive dashboarding to the divisions	Group Sust. Reporting Manager + Group sustainability reporting lead + IT department (?)	3/31/2024	Not started

5. | Annexes

5.1| SKAO-related communication plan

The planning below lists all communication that should take place in the context of the CO2 performance ladder.
As the , capacity of Renewi Teams to facilitate sustainability adoption is growing, it is observed that new roles and teams related to sustainability communication are brought to life at Renewi. For example, in the year 2022 each Division designated a dedicated Sustainability Leader, ESG has also been recognized as an area of influence of the financial, procurement and communication teams. Therefore, the planning shown below serves as of now as a “draft guideline” that will be further discussed and enriched in 2023 with the head of internal communication to reflect the variety of roles and responsibilities within Renewi. The objective will be about building a clear communication plan – at group and at division level.

TOPIC	WHO	HOW	TARGET GROUP	WHEN frequency	OBJECTIVE
CO2 footprint of company and projects with award advantage	Head of Sustainability Divisional Sustainability Manager Head of communication of the division – where there are projects.	Website of divisions/companies, ACTUA newsletter (weekly e-mail), News item (external channels), narrowcasting screens	Internal mostly Extern for the twice a year communication requirements of CO2PL	Twice a year	Increase awareness of the CO2 footprint internally and externally
Energy- and CO_2 management plan	Head of Sustainability Divisional Sustainability Managers or SHEQ Managers Director of Strategy and Bus. Development SHEQ Director Internal communication team – key person to be identified case by case.	Website of divisions/companies, ACTUA newsletter (weekly e-mail), News item (external channels),	Internal & External	Once a year - September	Increase awareness of the CO2 footprint internally and externally
Progress report objectives and action plan measures	Head of Sustainability and Group Sustainability Reporting Lead– align/ collect progresses and reports from the divisions.	Website of divisions/companies, ACTUA newsletter (weekly e-mail), News item (external channels), Or RTL updates	First: Internally & quarterly as of Q2 2022 Externally		Increase awareness of the CO2 footprint internally and externally Give clear updates to investors of Renewi,

	Divisional Sustainability Managers or SHEQ Managers are responsible to align with their team and Managing directors on GOALS/ Targets/ Roadmaps	Or Key divisional updates led by Managing directors		Yearly – when Group sustainability is being published (May)	Provide important information's for ESG ranking agencies
Voluntary disclosures and performance benchmarking	Group Sustainability Reporting Lead – responsible for preparing external submissions Investor Relations – communicating the outcomes of ratings, benchmarking and disclosures with interested investors	Participation in the ratings, ESG indices and external disclosures most relevant to Renewi, by eg: - the coverage of topics - the level of interest of investors - the quality of insight for internal management generated from the disclosure	External – to receive the rating Internal – to implement feedback from the rating	Depending on a rater/disclosure, typically once a year	Increase awareness of Renewi ESG management practices among shareholders, making Renewi a trustworthy and transparent investment prospect Benchmarking Renewi ESG performance to best external practices to inform the internal decision making
Opportunities for individual contribution, current energy consumption and trends within the company and projects with award advantage	In the division: Divisional internal communication team At group level: Head of Sustainability and Head of Internal communication – through an Am	Website of divisions/companies, ACTUA newsletter (weekly e-mail), News item (external channels), And LIVE streams – Still to be confirmed: An Ambassador program delivered through specific sustainability training and onboarding.	Internal	Continuous 2 times a year It will be continuous	Stimulate employee involvement and encourage employees to reduce CO2 Push projects definition to include CO2 reduction figures. Education on What sustainability is, what are the goals and how each employees can contribute.
News items about initiatives	Divisional Sustainability Managers or SHEQ Managers Their Managing directors Internal communication team – key person to be identified case by case.	Website and internal social media (Renewi GO) Website and external social media (LinkedIn & Instagram)	Internal & External	Continuous	Awareness, education and encouraging external stakeholders or external partners engagement
Mandatory publication of the SKAO	Head of Sustainability External communication team	Website SKAO	SKAO	Once a year - September	Publishing documentation associated with requirement 3D1 and annually updating the list of measures

[END OF DOCUMENT]