



Management review CO₂ management system 2024

Renewi Netherlands Holding B.V



CO₂-PRESTATIELADDER[®]

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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 CO₂ management system that has been implemented within Renewi Group, and particularly (for the purpose of CO₂ 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. The below report covers the MANAGEMENT SYSTEM:

- o Evaluation of the data and management quality
- o Evaluation of information distribution system
- o Evaluation of the reduction governance
- o Process improvement plan for the upcoming year

The aim of this management review is to evaluate the previous reporting cycle (FY24) and verify whether the proposed control measures have contributed to achieving the set CO₂ reduction targets. 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 CO₂ Management Plan.

The feedback about the quality of the management system is normally delivered to the Group management after every data collection exercise on an ongoing basis, typically via email and PowerPoint summary (quarterly for the health of the recycling rate system and half-yearly for the health of the GHG system). More frequent discussions take place since FY24 as driven by the CSRD compliance preparation process, which demands that similar systems are structured for other material topics as well.

The format of this report is only released once a year to the satisfaction of the CO₂ Performance Ladder certification.

Renewi is a LARGE organization, as per the definition of SKAO (Handbook v. 3.1., Chapter 4.2: total CO₂ emissions amount to more than 2500 tonnes per year) and as such is not subject to exemption related to the organizational size.

In the past, (October 2022) this report's content has been delivered in 3 documents:

- Directiebeoordeling
- Energiebeoordeling
- Energie and CO₂ Management plan

In October 2023, the key messages from all these documents were synthesized into one document. In September 2024, we are producing two books: Performance report and System report, to handle the size of the document., .

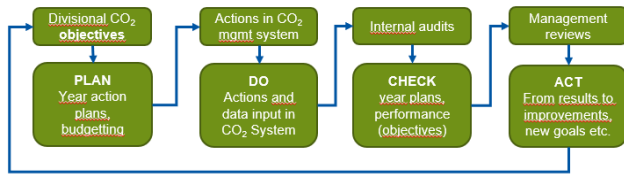
Thousand separator has been noted as a comma (,) and decimal places are preceded by a period (.).

Commented [AT1]: I've matched the wording to the performance report



2 | 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 GHG emissions Scope 1 and 2 reporting manual. The table below helps mapping the CO₂ Prestatieladder's steps and requirements to Renewi environment.

	Frequency	Moment in year	Group Sust.	Sust. Managers divisions	Division's Managing Directors /Financial Directors	Communications 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 CO ₂ 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			

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3.1 | Evaluation of the data quality management (Insight)

All the quality-related mechanisms and controls have been described in the methodology document which has been shared with the auditors. CO2 Prestatieladder requires that the CO2 management system meets the criteria of ISO-14064-1. 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 notes from internal audit, also shared with CO2PL auditors.

Outcomes of the internal evaluation of the system

Data quality progress

In FY24, data quality has been maintained and improved in iterations, based on the criteria and feedback from the 3rd party audit to the ISAE 3410 standards on our Scope 1 and 2 accounting. As a result of that progressing scrutiny, Renewi has revisited its FY22 and FY23 numbers. Changes also happen on the non-CO2 related fronts; Renewi has expanded its limited assurance coverage by the Recycling Rate and LTIF KPIs, showing commitment to improve overall maturity of the non-financial reporting systems.

Roles and responsibilities

The reorganization of responsibilities around non-financial reporting has now been completed. The mandates are distributed as follows:

- The preparation of methodologies and dissemination of their understanding: is a responsibility of Group Sustainability Reporting Team, reporting to Group Financial Controller
- Preparation of data: is the responsibility of Divisions; depending on Division, it could be via Sustainability Leaders or through an assigned Reporting Analyst within the Division.
- Internal quality control on data before the internal announcement of results: is a responsibility of Financial Directors, except for Scope 3, where that responsibility sits with the Group Sustainability Reporting Team. It is expected to migrate towards FDs or relevant Group functions over time, as the Scope 3 accounting matures.
- Internal quality control on the methods and the conclusions drawn – Group Sustainability Reporting Team, Internal Audit Preparation to the external audit and managing the process with external auditor in the run-up to the Annual Report publication: Group Sustainability Reporting Team, with assistance of the colleagues responsible for preparing the data
- Crafting the messaging, conclusions and calls to action: Group Sustainability Reporting Team, Head of Sustainability (Strategy department), Division Leads, FDs/MDs as required

Automation and integration of data sources

Work on automating data collection continues, and will further gain importance with the arrival of CSRD-compliant reporting which strongly relies on the data systems, to deliver disclosures at scale. In FY24 we have taken steps to improve the mapping of data between fuel and electricity meters and invoices, which increases our confidence in a large part of scope 1 and almost all scope 2 data.

Further improvements proposed

As a part of annual self-performance review, the Sustainability Team and its closest stakeholders identified the following points of improvement:

1. While every division had been working separately on developing their own carbon reduction plans in the last few years by first focusing on energy (reduction of consumption, greenifying the electricity supply...) and on lowering the carbon footprint in the logistics for the two commercial waste divisions, Renewi Group still had to consolidate one overall Group carbon reduction roadmap – to ensure its line of travel was aligned with the newly

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Commented [AT2]: Not sure if this is a necessary comment to make??

Commented [MM3R2]: May seem unrelated, but I wanted to show that the organization is overall growing on the non-financial maturity front. Reworded. Is that sounding better?



set carbon reduction goals aligned with SBTi (goal of -50% carbon reduction ambition of scope 1&2 between FY22 and FY31 and 25% of scope 3) and made public beginning of 2023. Ongoing work is required to maintain this central level of monitoring during implementation

2. Top-level overview of heat production should be improved by FY25, as currently only a very fragmented range of data can be collected and only jointly with electricity as part of CHP. Investigating the trade-offs between fuel-based energy supply vs electricity vs heat etc. remains a challenge.

Outcomes of the external evaluation of the system

Renewi continues to pursue limited assurance on its Scope 1 and Scope 2 data and the feedback from that process is the main source of the external opinion on our system.

Conclusions from the FY24 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):

1. Several instances where formulas were applied incorrectly were identified and rectified by the Renewi Team – this also included a need to reassure past year's data.. Majority of the discrepancies found were due to post-date adjustments of data in the source systems, or the inability to trace exactly to the source used (given the time gap between the certification moment and the data collection itself, and changes to the personnel and systems during this time).
Action point: further automation of the systems and shortening the time lead between data collection and audit will help reducing this risk.(point remaining from last year)
2. Lack of division-level handbooks on how to prepare data for GHG reporting puts Renewi in a position of overreliance on key employees to get the right inputs.
Action point: This year should see a codification of daily practices at the granular and divisional level, to minimize this one-person risk across the board.

Full feedback regarding the process and methodology has been shared with the auditors.

3.2 | Evaluation of information distribution system (Transparency)

The system setup:

Renewi's CO₂ management system is described in detail by the methodology documents, list of sites and emission sources within the boundary and the feedback documents from the recent assurance process. All of those are managed by the Group Sustainability Reporting Lead. The management has been informed of the content of the above documents and endorses this content.

Stakeholder management and analysis

Communication around climate-related progress is a part of Renewi strategy. Yet, various interest groups will be able to offer a broad range of scrutiny 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. The list of stakeholders we are currently working with and the approaches to communication are all listed in our Annual report on p. 112-115.

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Commented [AT4]: Why is this highlighted?

Commented [MM5R4]: Actually this is not changing so highlight is not needed, you're right



As a part of preparations to reach CSRD compliance with double materiality assessment, Renewi has refreshed the stakeholders analysis and materiality mapping, but the results have not yet been published: this is scheduled for the first CSRD-compliant report of AR FY25.

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 CO₂ 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 CO₂ impact in the chain of 'more sustainable' processing methods
- Renewi must formulate or explicitly communicate the Energy/CO₂ policy and put it into practice by means of a PDCA cycle

Two of those points can be considered already addressed: since 2020, the organization has been deploying more electric trucks and electrical equipment on locations. In the field of mobility, working at home/remotely has been promoted, and a new policy is in place to only allow the orders of EV cars via corporate lease going forward.

Thirdly, Renewi is working on providing better insight into its CO₂ impact as a result of its operations: together with LCA scientists from [TNO], our CW NL division was able to produce locally-specific material emissions and avoidance factors. For more details on this project, please refer to: <https://www.renewi.com/en/about-renewi/erkenning/waste-journal-articles/renewi-announces-new-co2-and-recycling-reporting-for-customers>

Work on improving the quality and timeliness of internal reports continues, bringing already a certain standardization of communication outputs in FY24.

Distribution of information

As we lay in place a new management structure related to E, S and G responsibilities, the flow of information within the company evolves and matures. Below paragraphs describe briefly how various groups receive their GHG-related updates.

Internally:

Employees are 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 June & 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%. 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 popular communication channel, and performance on CO₂ is also presented, explained and tracked. Renewi community is also animated through dedicated sub-page on Sharepoint, launched in FY24. and on the social platform Viva Engage, via posts from the Sustainability colleagues and the internal communication team.

Sustainability Core Team (consisting of the Head of Sustainability, Group Sustainability Reporting Team, Division Sustainability Leaders) are meeting monthly for a project-related update, discussing reporting needs, progress, and in a separate session, addressing any complex improvements together, seeking shared insights.

The Executive Leadership Team (ELT) and Board of Directors, together with the Managing directors of the divisions:

Since Q4-2021, the ELT receive monthly an update on the sustainability results and performance of Renewi PLC which is then periodically presented to the Board. Quantitative results are shared quarterly and half-yearly. This management report should be circulated through Group

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Commented [AT6]: I'm removing the date. Normally its may we publish the AR but I'm not convinced CSRD compliant report would be published at this date

Commented [AT7]: Do we want to say TNO or just an external company? Do we want everyone external to the company to know who we're working with??

Commented [LA8R7]: This is okay. And this is already public actually.

Commented [LA9R7]: As this is a public document. The link to the press release can be added?
<https://www.renewi.com/en/about-renewi/erkenning/waste-journal-articles/renewi-announces-new-co2-and-recycling-reporting-for-customers>

Commented [MM10R7]: Excellent idea, cross- promoting our articles, link added.

Commented [AT11]: This sentence hasn't been finished – what were you trying to say?

Commented [MM12R11]: Fixed

Commented [AT13]: Whats this report?

Commented [MM14R13]: This document. How do I say this differently to make it obvious?



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.

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

In FY24, the reporting team and Divisions have developed a policy on communicating the periodic results which details the process on seeking feedback on data and developing explanations together with the FDs prior to sharing with the Senior Management. See document: [20231214 Memo - Communicating KPIs.docx](#)

Another improvement in communication is developing standardized format of sharing the Recycling Rate and carbon footprint insights, which can be repopulated with new data every period, without losing time on excess design.

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 Report. These can be viewed via the websites www.renewi.nl and <https://www.renewi.com/en/investors/investor-relations/reports-and-presentations> (in English). In FY24, for the first time, Renewi has only published one document, including the typical content of Sustainability Review inside the Annual Report as the Sustainability Information chapter. This is a preparation for publishing in a CSRD format.

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. It is a duty of Renewi as a certified organization to 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 has been organizing livestream events twice a year, mirroring those for our employees, where our customers are invited to join and hear about our latest innovation projects and latest challenges. These events take place in June and in November, lasting 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 ambition to do things better. Exceptionally, in FY24, the June event did not take place and was postponed to September, to be able to include an update on the work with TNO on customer reporting, mentioned earlier.

Renewi is also a vocal supporter of regulation that supports circular economy. Primary area of activity is in the 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):

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Commented [AT15]: I don't think this is necessary

Commented [AT16]: Why didn't it take place? – can the reason be externally published?

Commented [LA17R16]: It was postponed to September

Commented [LA18R16]: So we would have a proper update on CSRD reporting for customers

Commented [MM19R16]: Rewrote - added this explanation. Does it read good now?



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 FY24 (2023-2024):

- Renewi maintained its membership in the FTSE4GOOD index
- Maintained its followship of UN Global Compact principles, ([Renewi PLC | UN Global Compact](#))
- Improved the quality of Renewi climate- and energy-related reporting as evaluated by CDP: the score for Climate Change Disclosures is maintained at C but detailed evaluation highlights progress in the areas of energy, risks disclosure, and Scope 3. ([CDP website](#))

Renewi has committed to set SBTi targets within the next 2 years in FY22. However, the news of upcoming sale of Municipal business is a material change that calls for a re-evaluation of the target level as well as the decarbonization plans to achieve them. Therefore the SBTi targets shall not be submitted until the sale of Municipal business is completed and consolidated. Still, Renewi is working with the assumption that it will be possible to submit Renewi's dossier and targets for review before the end of the 24 months delay period.

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.

Ratings scrutinize us on the energy and CO₂ 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. FY24 saw a successful first-time achieved a 3rd party limited assurance. This allowed us to re-examine and improve our control systems on those KPIs, and next KPIs are being considered to undergo a similar assurance exercise. This will be largely determined by CSRD priorities.

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

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 years, 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.

Further work revolves around (for the reporting team) the integration of data in digital layers, to speed up the reporting work and minimize the risk of error and increase auditability, as well as (for the strategy team) the consolidation of the Group Decarbonization roadmap, the approval of key transformational projects and the actual delivery of reductions. This happens through:

- Cultivating the continuous improvements mindset in the context of emissions management
- Educating all employees on Renewi's carbon reduction ambition and on EU regulations where CO₂ accounting/reduction disclosure are mandatory (eg. internal training on circular economy, training on CSRD for customer-facing teams in CW NL)
- Carbon reduction objectives start to be included in the performance objectives of key managers in the divisions.

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Commented [MM20]: Did this actually happen yet?

Commented [LA21R20]: Last year - yes. Some teams had carbon reduction targets in their targets. But carbon related targets are NOT YET within all ELT/EELT bonus scheme. Not within LTIP scheme. This is a work in progress task.



- Onboarding Finance function to manage the quality of GHG reporting as part of operational data
- Including the GHG criterion for project selection when prioritizing CAPEX spend (which also helps building a more accurate picture of Renewi's carbon emission forecast linked to growth projects).

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 our goals.

The 1st draft of the new governance system around delivering initiatives to feed the carbon reduction pipeline has been shared with the auditors during the audit.

Update on Renewi's governance on decarbonization: After the presentation of the 1st decarbonization roadmap to the Board end of FY23, the internal "Carbon Taskforce" has been created. The Head of Sustainability is leading the taskforce which is composed of the divisional sustainability leaders and The Group Financial Controller in charge of the integration of the decarbonization roadmap within the financial planning.

- The "carbon taskforce" should:
 - Report at least 2 times a year to the ELT on carbon reduction roadmap progress, year to date performance & delivery of approved/running projects and expected forecast for the coming 2 years.
 - Create adequate cross divisional expert teams on key carbon emission topics – where special cross divisional discussions and alignments are needed.
 - Work on enriching the decarbonization roadmap to meet carbon reduction goals by FY26 and FY31.

Remark: The paragraph above provides an update on the internal governance set in place between end of March 2024 and September 2024. As Renewi is currently going through a reorganization, the new organization is taking into account how to deliver on Renewi's sustainability ambition and capturing the necessary day to day requirements into new roles/responsibilities of key functions and into the newly built approval process of projects.

External collaboration for reduction

The inventory of our sector-wide or value-chain specific initiatives can be found on the SKAO profile of Renewi.

Pipeline of collaborative projects is stable in volume – where old projects expire, new ones take their place.

During a recently held workshop regarding Scope 3 emissions for key Renewi functions it became clear that collaboration is necessary for achieving reductions in value chain, so this approach will continue to be championed across the company.

3.3 | Process improvement plan for the upcoming year

FY24/FY25 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. Resolve internal audit discrepancies	Change of responsibility: from Head of Sustainability to Group	30-05-2024	Complete with the revisit of the FY22 and FY23 numbers in FY24

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	Sustainability Reporting Manager		
2. Improving data management (system) for Energy and CO2 data at location level	Head of Sustainability + Group sustainability reporting lead	(?)	PENDING: big strides made by the divisions in mapping out all emission sources, yet further work on site-level accuracy continues
3. 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: A range of assumptions revisited (engine efficiencies updated in FY24) – further work required to understand the relationships between various parts of the installation and reflect that in the GHG modelling
4. 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)	Completed: CSRD roles and responsibilities are reassigned, steerco nominated, next step of the journey requires rolling out implementation projects for each CSRD deliverable
5. Improve energy data structure and integrate into Group level governance	Group Sust. Reporting Lead + Divisional Sustainability Leads	31-03-2024	Not started – current information structure remains in scattered excels
6. 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	Partially completed – charts and cuts prepared and standardized in .ppts, dashboarding requires additional resources

ACT:

In order to deliver on the last improvement objectives, the sustainability team continues to engage internal IT and reporting functions, leveraging external support where necessary. At the moment, any improvements which don't directly support CSRD readiness maybe deprioritized.

PLAN:

The projects transferred over from the previous year:

Action	Responsible	Expiry date	Status
1. Improving data management (system) for Energy and CO2 data at location level	Group sustainability reporting, Group sustainability reporting+ Divisional Teams	continuous process	In progress: <ul style="list-style-type: none"> Different level of progress in every divisions. further work on site-level accuracy for sources
2. Advance to higher quality accounting methods on process emissions on installation-level basis (Phase 2)	Group Sust. Reporting Lead and Divisional Sust. Leads	continuous process	Not started - Work required to understand the relationships between various parts of the installation and reflect that in the GHG modelling
3. Improve energy data structure (esp. heat data) and integrate into Group level governance	Group Sust. Reporting Lead + Divisional Sustainability Leads	31-03-2025	Not started – but in the planning in order to have part of year 1 of CSRD reporting.

Commented [MM22]: @Adele, @Lauriane, @Claire, Let's review this together and see what action points do we WANT to communicate? Maybe not all I listed here, maybe we can write RACI together...etc etc. Treat this as a first draft based on general feel of what's on our agendas.

Commented [LA23R22]: This looks quite empty (especially the part related to CSRD). Let's work on getting this complete before public disclosure.



4. Move the standardized data cuts to dashboarding	Group Sust. Reporting Manager + Group sustainability reporting lead with the support of IT department	continuous process	In progress
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As discussed in chapter 3.1, new improvements have been discussed. They are listed in the table below and will be monitored for completion within the coming audit cycles.

Action	Responsible	Expiry date	Status
5. Develop a divisional & group monitoring solution for the decarbonization initiatives	Group Strategy – with the support of IT department	continuous process	First draft created in the divisions and at group level. Second iteration being created.
6. Continue the move of data structure to Data Lake to minimize human errors	Digital Infrastructure and shared Platforms Team, Group Sustainability Reporting Team	continuous process	In progress
7. Create division-level manuals on calculations to improve consistencies in data collection	Sustainability Division Leaders, Group Sustainability Reporting	continuous process	In progress



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 sustainability adoption at Renewi is growing, we are continuously adjusting our communication plan to phase in the right information to right audiences at the right time, given their level of awareness. Therefore, the planning shown below serves as a guideline that is continuously enriched – through discussions with external/internal communication team leaders and head of HR as this is related to Renewi’s company culture.

Commented [MM24]: Table already reviewed by Lauriane and her changes all incorporated. + I have shortened the intro paragraph by removing the reference to team changes done in FY22-23, since that’s old news.

TOPIC	WHO	HOW	TARGET GROUP	WHEN frequency	OBJECTIVE
CO2 footprint of company and projects with award advantage	Head of Sustainability Divisional Sustainability Manager- where there are projects. Head of communication of the division – where there are projects.	Website of Renewi 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 CSO SHEQ Director Internal communication team – key person to be identified case by case.	Website of Renewi 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. Divisional Sustainability Managers or SHEQ Managers are responsible to align with their team and Managing directors on GOALS/ Targets/ Roadmaps	Website of Renewi ACTUA newsletter (weekly e-mail), News item (external channels), Or Senior People Leader calls updates (done with the CEO) Or Key divisional updates led by Managing directors	First: Internally & quarterly as of Q2 2022 Externally	Yearly – After Annual Report is being published (May)	Increase awareness of the CO2 footprint internally and externally Give clear updates to investors of Renewi, Provide important information's for ESG ranking agencies



Voluntary disclosures and performance benchmarking	<p>Group Sustainability Reporting Lead – responsible for preparing external submissions</p> <p>Investor Relations – communicating the outcomes of ratings, benchmarking and disclosures with interested investors</p>	<p>Participation in the ratings, ESG indices and external disclosures most relevant to Renewi, by eg:</p> <ul style="list-style-type: none"> - the coverage of topics - the level of interest of investors - the quality of insight for internal management generated from the disclosure 	<p>External – to receive the rating</p> <p>Internal – to implement feedback from the rating</p>	<p>Depending on a rater/disclosure, typically once a year</p>	<p>Increase awareness of Renewi ESG management practices among shareholders, making Renewi a trustworthy and transparent investment prospect</p> <p>Benchmarking Renewi ESG performance to best external practices to inform the internal decision making</p>
<p>Opportunities for individual contribution, current energy consumption and trends within the company and projects with award advantage</p>	<p>In the division: Divisional Sustainability leaders – supported by their team (when there is a team)</p> <p>And supported by head of Sustainability</p>	<p>One Dedicated Sharepoint with group visions and dedicated divisional pages – highlighting the key progresses of each divisions and the people in the lead (sustainability leaders, their teams...)</p> <p>Name/contacts of key people to connect with in each divisions are known. Employees can reach out with ideas.</p> <p>2 LIVE sessions (videos) done per year – explaining the trends and presenting the composition of the carbon reduction roadmaps (explaining the HOW)</p> <p>One Group owned dedicated e-mail address has been created to encourage sharing ideas.</p>	<p>Internal</p>	<p>Continuous</p> <p>Live sessions – 2 times a year</p>	<p>Stimulate employee involvement and encourage employees to reduce CO2</p> <p>Education on What sustainability is about within Renewi, on Renewi's sustainability goals and on how each employees can contribute.</p>
<p>News items about initiatives</p>	<p>Divisional Sustainability Managers or SHEQ Managers Their Managing directors Internal communication team – key person to be identified case by case.</p>	<p>Website and internal social media (Viva Engage)</p> <p>Website and external social media (LinkedIn & Instagram)</p>	<p>Internal & External</p>	<p>Continuous</p>	<p>Awareness, education and encouraging external stakeholders or external partners engagement</p>
<p>Mandatory publication of the SKAO</p>	<p>Head of Sustainability External communication team</p>	<p>Website SKAO</p>	<p>SKAO</p>	<p>Once a year - September</p>	<p>Publishing documentation associated with requirement 3D1 and annually updating the list of measures</p>



[END OF DOCUMENT]