

# Welcome

Augean PLC has sought to follow principles of environmental, social and corporate governance since the company's inception. This is demonstrated through our company values, policies and management systems and our interaction with the communities where we operate.

The world is moving towards 'Net Zero' and we will be part of that journey. We report our ESG information in this Corporate Sustainability Report (CSR). We have disclosed information using GRI-Referenced data (see GRI Index Table 1) for relevant GRI standards disclosed and also disclosed specific waste management sector performance indicators to demonstrate our Environmental, Social and Corporate Governance (ESG)

credentials and to enable Streamlined Energy and Carbon Reporting (SECR). This is the 16th annual CSR report prepared by Augean and is for the calendar year 2020.

We are developing further plans to reduce our carbon emissions to contribute to the UK's commitment to reach Net Zero by 2050, and for 2021 and beyond we look forward to expanding our portfolio of ESG disclosure and implementing relevant KPIs and targets.

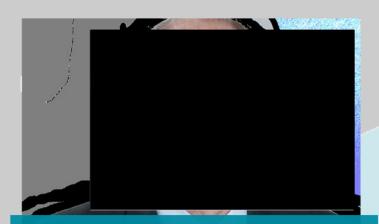
The table below provides a summary of the Group's SECR for 2020:

Metric	Data
Total energy consumption (kWh)	16,815,730 (kWh)
Emissions from combustion of gas (tCO <sub>2</sub> e)	540.86 tCO <sub>2</sub> e
Emissions from combustion of fuel for transport and business travel purposes	1,161.55 tCO <sub>2</sub> e
Emissions from combustion of fuel for other activities which the company own or control including operation of facilities	1,708.67 tCO <sub>2</sub> e
Emissions from purchased electricity	779.52 tCO <sub>2</sub> e
Total gross tCO <sub>2</sub> e from mandatory elements above	2,481.93 CO <sub>2</sub> e
Intensity ratio: tCO <sub>2</sub> e gross from mandatory elements per net tonne of waste handled	0.0036 tCO <sub>2</sub> e/tonne waste
Methodology	Energy usage calculated from ESOS reporting and emissions calculated according to the GRI and Augean's own data

### **Contacting Augean**

To find out how Augean can help your business call us on **01937 844980** or email us at contact@augeanplc.com to arrange for a sales adviser to call you.

Augean PLC, 4 Rudgate Court, Walton, Wetherby, West Yorkshire, LS23 7BF



### A message from Jim Meredith

I am pleased to introduce Augean PLC's Corporate Social Responsibility (CSR) Report for the year ending 31 December 2020

Augean designs, operates and delivers processes for effective and safe management of hazardous waste predominantly operating within the UK. Several of our business streams provide critical services to the UK. We provide solutions for the handling and treatment of difficult wastes with the aim to optimise and find useful purpose for these materials. Where this is not appropriate, we provide safe disposal in highly engineered landfill for wastes that cannot be recycled, reused or recovered, which remains the best practicable environmental option for such wastes.

The purpose of this report is to enable our stakeholders to understand how we approach the balance of effective management of difficult to handle hazardous wastes streams; including safe disposal by landfill, the financial and non-financial issues that affect our Company, the local communities around our sites and the environment within which we operate, in a sustainable manner.

ESG is integral to how all of us in Augean conduct business, living our values of 'Respect, Integrity, Teamwork and Excellence'. The creation and maintenance of positive relationships with all our stakeholders and a respect for the environment are the foundations on which the Company is based. Augean is committed to conducting its business operations in an open and responsible manner and we recognise the need to continually improve our operations where practical to do so, to reduce our impact on the environment; to continuously improve assets and processes; to ensure the safety and welfare of our employees; and to act as a good neighbour, minimising the impact of our operations on the wider community. The health, safety and wellbeing of our employees, compliance with regulations and reduction in CO<sub>2</sub> through energy usage, are part of the Group's top business priorities.

The Board continues to recognise the risks faced by our people, who work in challenging environments involving the moving, treating and disposing of hazardous waste. The management team has continually improved the safety environment by enhancing hazard recognition, risk evaluation and learning from incidents. 2020 saw a decrease in accidents and the number of incidents from 2019, including those we are required to report,

with no major injuries recorded. While we remain one of the best performers in our industry, we choose not to be complacent, and we will continue to strive to improve. The business continues to analyse trends and the causes of incidents to improve and to ensure suitable preventative action is taken. We endeavour to encourage ever increasing commitment to improving health and safety outcomes throughout our stakeholders and in support of this goal, reporting of near miss incidents continued to be a key part of the health and safety programme during the year. We supplement 'near miss reports' with 'safe act' reporting to further applaud and encourage safe working practice.

Waste management is a critical industry hence the business has been fully operational throughout the Covid-19 crisis. All the Group's sites remained open throughout the pandemic with non-core staff working remotely and additional control measures implemented at sites in line with government guidance.

The Group continued with its streamlined business model in 2020 with focus on increasing revenue in attractive, growing segments of the hazardous waste market to drive underlying cash generation and adjusted profit, whilst maintaining our high standard of health safety and environmental performance. The underlying trading in all the Group's businesses was positive and robust although Covid-19 had a significant impact in quarter two particularly on the construction and biomass sectors; and additionally, our North Sea business was adversely impacted for the second half of the year. As a result, the Group delivered a small growth in adjusted profit before tax to £19.3m (2019: £19.2m), which represents a very credible achievement given the Covid-19 impact, demonstrating the underlying resilience of the business.

The Board recognises that corporate stewardship underpins our business success commercially and is dependent on the quality, diligence and hard work of all Augean's employees. We all have a collective role to play in this. I am incredibly proud of the effort and dedication of our employees during a year where everyone had to go beyond their normal duties so that Augean could deliver our critical national services through the period of crisis, whilst maintaining Group profitability.

I look forward to working with our teams to further develop the Group through 2021 and into the future on behalf of all our stakeholders. 2021 represents a transitional year for our Company in terms of ESG reporting. We will be moving towards a reporting approach that not only discloses our performance but the wider purpose of our operations. We want to share the value that we bring to the waste sector and society for difficult to handle hazardous wastes. We will be expanding our ESG reporting base to include sustainability targets and developing the actions we need to implement and how we are going to transition them into the business.

This report demonstrates that we have been able to sustain our principles and continue to seek ever more robust standards of corporate stewardship during an exciting period of commercial operation balanced against a national crisis. I hope that you find this report informative.

Jim Meredith Executive Chairman

# Adding value with what we do

Augean PIc is an AIM quoted public company formed in 2004 and is the UK's leading hazardous waste treatment and disposal operator. We add value to society by managing hazardous waste safely and in accordance with principles that respect the waste hierarchy.

The Group is strategically positioned to provide strong commercial and compliance-led solutions in complex and legislation driven markets. The Group provides a wide range of services through its treatment, decommissioning, transfer, industrial services, landfill disposal, recovery and recycling capability.

### Augean North Sea Services (ANSS)

The ANSS strategy is to provide complete waste management to the Oil & Gas Industry, by utilising the offshore and onshore waste management and industrial service offerings of ANSS along with the treatment, recovery and disposal assets of Augean PLC. ANSS has a head office (Aberdeen) sustained by authorised facilities in Aberdeen, Lerwick, Dundee and Great Yarmouth.

Our hazardous and radioactive waste management facilities allow for the development up the supply chain, of waste and industrial services in the North Sea Oil & Gas market.



ANSS specialise in the development of innovative solutions to manage all waste streams derived from North Sea exploration, production and decommissioning activities. The work concentrates on oily slop and emulsion waste treatments along with specialised waste treatments, recovery and disposal. The service is delivered by a fully trained competent and multi-skilled workforce specialising in:

- offshore drilling and production waste recovery and containment;
- on and offshore equipment decontamination and surface preparation;
- · quayside marine vessel and tank cleaning;
- emergency response crews;
- hazardous (special waste in Scotland) collection; and
- industrial tank cleaning.

### **Industrial and Chemical Treatment Services**

Augean industrial and chemical treatment services undertake the treatment, recovery and disposal of a broad range of chemical and oil-based wastes, including those generated in the offshore oil and gas sector. Operating from Paisley, Port Clarence and Avonmouth, business continues to focus on expanding its customer base to offer services which fully utilise assets providing thermal, biological, physico-chemical and mechanical treatment solutions for onshore and offshore customers with a focus on generating process residues to appropriate specifications allowing their use as alternative materials and sources of energy for a broad range of process industries.



Industry sectors served by the business include ports and shipping and other large-scale logistics operations, primary and secondary process industries including chemical refining and processing, power generation, offshore oil and gas exploration and production, on land decommissioning and decontamination, water treatment and supply and materials bulk storage handling and distribution.

A wide spectrum of industrial services capability is provided to customers through a network of strategically located specialist assets, operated by dedicated, experienced and skilled operational teams, with in-house technical support, which is mutually beneficial to the overall objectives of the business and the Group. The team providing front end specialist services to our customers at their sites and operating centres.

This is supported and underpinned by the Group's national treatment capability and strong regional presence. Therefore, customers have the assurance that all aspects of the services provided, including waste treatment, recovery and disposal, can be delivered through the business and the Group's internal supply chain.

### **Landfill and Soil Treatment Centres**

Augean's landfill and soil treatment centres are strategically situated across the UK. Our specialist treatment and landfill assets provide a platform of waste services to a broad market including the energy, chemical, nuclear, oil & gas, construction and waste industries.



Augean has specialist treatment and recycling centres that process by-products and waste materials to provide cost effective solutions for re-use, recovery or disposal. For example, we have significant processing capacity to sustainably treat ash residues from waste and biomass power plants and we continue to provide an important support service to this growing sector. Recent investments in our chemical treatment facilities have added greater flexibility to process by-products from a range of industries.

Underpinning these treatment systems are our landfill facilities; engineered to the highest standards and monitored under the Environmental Permitting Regulations (EPR) regime. All sites can accept a broad range of materials and wastes. Wastes are subjected to a rigorous technical assessment and testing regime before they are accepted and when they are received.

Gas is a by-product of landfill operations and we use this energy source to generate electricity at our Port Clarence facility. An established grid connection coupled with good reserves provides future opportunities to expand our energy portfolio. We also own mineral extraction rights in the East Midlands and provide limestone aggregate to local businesses and construction projects.



#### **Radioactive Waste Services**

Having established Augean's Low-Level Radioactive Waste (LLW) management services at ENRMF over the past years, the service has been safely and successfully operating to allow the use of the landfill facilities to address the need for disposal of waste which is only contaminated with very low levels of radioactivity.

This waste comes from the operation and decommissioning of nuclear facilities, extraction of natural resources from the earth (radiation is found in naturally-occurring material) and clinical uses of radioactive materials.



Technical regulators continue to monitor the facilities, and the continuous operation of these disposal routes for LLW remains a critical part of the management of LLW in the UK and a major opportunity for the business.



# Introduction

Our business provides solutions for hazardous and other difficult to handle wastes. Dealing with hazardous substances requires expert, technical knowledge that our staff possess. We must deal with such wastes safely, and in compliance with environmental and health and safety legislation. We must operate with integrity and in an ethical manner and embrace diversity.

Dealing with hazardous waste means that all aspects of the waste hierarchy are relevant. This is an important factor in a world which is (quite rightly) seeking to minimise landfill disposal for wastes that can be recovered or recycled, particularly municipal solid waste (MSW). Whilst disposal represents the base of the hierarchy, it is nevertheless the best practicable environmental outcome for some waste streams for which safe, disposal in an engineered landfill represents the Best Available Technology (BAT) for such wastes.

Investors are increasingly placing sustainability as priority on their agendas, requiring companies to adopt more sustainable practices. Assessing sustainability risks requires that investors have access to consistent, high-quality, and material public information. This means that identification and governance of ESG themes that are material to a company and its sector become essential to managing risk. Embracing ESG can lead to long-term increases in shareholder value.

Therefore, Augean takes its ESG responsibilities seriously and aims to use this report to demonstrate how we maintain the fine balance of dealing with hazardous wastes including safe disposal by landfill, with the financial and non-financial issues that affect our Company, the local communities around our sites and the environment within which we operate, in a sustainable manner.

At Augean, our ESG relationship is promoted directly through clearly stated Company values together with the health, safety, environment and quality policy which can be found on our website <a href="https://www.augeanplc.com/esg/">https://www.augeanplc.com/esg/</a>. The health, safety and wellbeing of our employees, compliance with regulations and reduction in CO2 through energy usage are three of the Group's top four business priorities.

We are committed to evolving our ESG performance to provide assurance to our key stakeholders including our customers and our investors, to minimise risk and maximise growth potential. Indeed, we work with some customers to help them analyse the ESG impact of their waste production with associated processes by sharing a software platform to calculate their Scope 3 carbon emission data for wastes they send to us.

The Group continues to take a strong role in the development of regulation and policy for hazardous waste as well as developing new options for the recovery of waste as part of our commitment to implement the elements of the waste hierarchy relevant to the hazardous sector. We promote the profile of the industry and modernisation of the sector, seeking to establish a positive regulatory and policy framework for the business by engaging with Government departments, local authorities and regulators.

In previous years, representatives from the Group took a high profile role in the development of the National Policy Statement for hazardous waste (NPS), directly engaging with Government departments and giving evidence at the Parliamentary Select Committee inquiry. We continued to engage throughout 2020 on topics such as Covid-19 within the waste sector, BAT guidance, substances of concern, radioactive materials liability insurance, planning, the Circular Economy Package, the Government's Resource and Waste Strategy and the developing Chemical Strategy and Brexit legislation.

The Covid 19 pandemic has affected the entire world. Waste management is a critical industry hence Augean has been fully operational throughout the Covid 19 crisis. All the Group's sites have remained open throughout the pandemic with noncore staff working remotely and additional control measures implemented at sites in line with government guidance. We established rigorous hygiene controls and procedures at the beginning of the crisis. Incidences of Covid 19 in staff across the sites have remained very low throughout the pandemic with no outbreaks affecting site operations.

This report aims to show how we maintain and improve our social responsibilities whilst managing our day-to-day operations and developing the business. A desire to maintain best-in-class standards of health, safety, environmental and compliance drive our business and our teams to continue to focus on our on-going development and providing new more, sustainable solutions to our customers and continual improvement. We believe that by delivering high standards we can also deliver business growth and profit for our shareholders. This is underpinned by a business strategy aimed at improving and modernising the United Kingdom's (UK) specialist waste infrastructure and providing new, more sustainable solutions to our customers.

Our CSR Report is a record of our Company performance and how we are working together to improve performance in respect of Company values, corporate governance, health and safety, the environment and within our local communities. The production of this report is a natural conclusion of our annual commitment to sustainability and responsible care, to evaluate our performance and provide focus on our aspirations for the future.

I hope that you will find the report informative. We have endeavoured to provide a comprehensive and straightforward account of our activities and we would welcome your views on how successful we have been. Please feel free to contact me to let us know where we have succeeded in meeting or exceeding your expectations and where we can improve.

Gary Bower
Director of Corporate Stewardship

# **Your Report**

This is a report prepared for our stakeholders; that is our shareholders, our customers, our local communities, our regulators, our supply chain and our employees. It is your report. In this section we explain how the report was prepared, how we selected the information to present and how the report is structured.

It is an important principle of the GRI that the relevant ESG disclosures should be identified through the Company's stakeholders. Our stakeholders have been identified over the life of the Company and we have developed a range of communication and feedback mechanisms with them (see Table below).

Our shareholders have a direct interest in our financial success but are strongly influenced by how we conduct business in terms of environmental, social and corporate governance.

Our employees are our most important stakeholder. They deliver our standards and our performance that affects all other stakeholders and later in this document our customer feedback demonstrates how much our customers value our staff. They are committed to the Company's success but seek good safe working conditions together with fair and equitable treatment and reward.

Principal communication and feedbac	ck mechanisms with stakeholders
Stakeholder	Mechanisms
Shareholders	Augean Annual General Meeting Face to face meetings with shareholders Feedback sought by our brokers and advisors Site Visits by shareholders
Customers	Direct Feedback seeking Customer feedback questionnaire Customer Duty of Care Audits Trade Associations and industry working groups
Local Communities	Community newsletter Company website Consultation email address and helpline telephone number Periodic community liaison meetings Open door policy for all operating sites Application engagement Maintenance of stakeholder register
Regulators and government	Regulatory inspections and audits EA bi-annual account meeting Direct engagement Trade Associations and institutes
Employees	Augean Update monthly newsletter Working and user groups Quarterly health and safety summit meetings Quarterly compliance review board meetings* Director Engagement visits* Daily operations meetings at all sites Health and safety committee meetings held at all sites

<sup>\*</sup> The Covid-19 pandemic lockdown requirements meant that these could not take place in 2020.

# **Indicator Method**

The material aspects considered relevant for disclosure are those that reflect the organisation's significant governance, economic, environmental and social impacts; or substantively influence the assessments and decisions of stakeholders. The materiality or significance of an aspect was determined by reference to the following sources:

- Specific feedback from stakeholders;
- Regulatory requirements;
- Industry sector standards and guidance;
- The aspects evaluation necessary for the Integrated Management System (IMS) standards;
- Reports prepared by customers and competitors;
- ESG ratings assessment; and
- Potential impacts identified through Environmental Impact Assessment (EIA) of specific projects.

A selection of disclosures and sustainability indicators are provided which we believe provides a picture of Augean's commitment to social responsibility and sustainability in managing our material aspects. Many of our indicators are aligned with relevant metrics in the GRI Standards list; but we have also included additional indicators which better reflect our sector (Reference: Indicating Right: Performance Indicators for the Waste Management Sector. Green Alliance 2004), and some of our own data to provide more information about the specifics of Augean's business and stakeholders' feedback. All indicators relate to Group performance unless otherwise specified. Generally, we have presented data for the last three years. For some new indicators this may be less.

Augean has not sought external assurance of this report and the information presented. This is something we are considering for the future. Nevertheless, many of the indicators (particularly those related to our management systems and permits) are individually subject to external review by our regulators, certification auditors and external advisors. Our values of integrity and excellence are an inherent part of the report and we have honestly sought to present a picture of how we manage our ESG responsibilities. This is a public disclosure and we should be pleased to address any questions readers have.

### Key:

GA: An indicator taken from the Green Alliance's Indicating Right: Environmental

Performance Indicators for the Waste Management Sector

GRI: A specific standard disclosure taken from the GRI Sustainability Reporting Standards

Augean: An internal indicator

N/Ac Not acquired or developed

N/Rec Not recorded

N/A Not applicable

# **Environmental, Social and Governance**

This part of the report is structured according to the pillars of ESG. We report on our performance for 2020 according to:

### **Environmental aspects**

- Biodiversity
- Emissions
- Compliance

### Social

- Human Resources
- Health and Safety
- Training
- Community Liaison

### **Corporate Governance**

- Ethics and Integrity,
- Financial Performance
- Corporate Behaviour

Augean operates in accordance with a Health, Safety, Quality and Environmental Policy that sets out our core commitments to be a responsible and sustainable business.

The Policy provides a framework of objectives to reduce our effects on the environment, to ensure the health, safety and welfare of our personnel, stakeholders, contractors, visitors and the public as well as maintaining client satisfaction through service excellence, across the Group. The policy is driven from top level in the Group through Directors and Managers to every employee and is reviewed at regular intervals.

The policy is made available to all interested parties including contractors and is published on our website

# 2020 at a Glance

### **Business**







92% incoming hazardous soils are treated to non-hazardous status

### **Environment**



>90% of English sites in Compliance bands A or B

100% Scottish sites rated "Excellent"

98 HA

managed for biodiversity across our landfill sites



incoming hazardous waste diverted from

landfill

- Intelligent voltage optimisation implemented at our Avonmouth facility
- O GHG: Intensity ratio: 0.0036 tCO<sub>2</sub>e/ tonne waste gross from mandatory SECR reported elements per net tonne of waste handled.









### Putting Safety and Compliance before Profit

### Social





Comprehensive preapplication

consultation programme

Consultation period extended from 6 to 15 weeks due to Covid-19 to give everyone the opportunity to participate for the extension of the

ENRMF site.

Operational staff IOSH trained

Health and safety improvement plans are in place at all sites.

Decrease in accidents compared to 2019. Number of incidents is low for our sector.

> Sites remained operational to provide critical services during the Covid-19 pandemic.

### Governance



£19.3<sub>M</sub>

Adjusted profit before taxation increased despite impact of Covid 19 in reducing sales

A full review of ethical standards & policy was carried out by the Audit Committee.



Augean maintains membership and takes an active role in sector rganisations and groups

31% Local expenditure





ISO 14001 Environmental Management

OHSAS 18001 Occupational Health & Safety Management

PAS 99 Integrated Management Systems

Certificate Number: IMR 522032



### **What we have achieved**

- Electricity used at the operational sites is derived from renewable energy sources.
- Augean commissioned the planting of 20,000 trees over an area of 4 hectares at our Marks Quarry site.
- Reduced waste miles: ANSS now manages drill cuttings waste locally, rather than transporting to North-West England and also processes and discharges Naturally Occurring Radioactive Materials (NORM) contaminated water locally a reduction in approximately 500 road miles per load
- Augean invested in trialling intelligent voltage optimisation equipment at its Avonmouth facility to switch site supply voltage down to reduce electricity usage, reduce greenhouse gas emissions and improve lifetime of electrical equipment. If successful, this technology will be rolled out across the Group.

- Augean has started to share an ESG software platform with our customers to drive performance improvement and deliver sustainability. Allowing them to better understand, monitor and manage their sustainability position by providing bespoke customer-centric information to manage Scope 3 CO<sub>2</sub> emissions.
- The Group increased dry recyclables' segregation and removed disposable water bottles and cups from our offices.
- The Group implemented driver performance monitoring to monitor harsh braking, harsh acceleration and harsh cornering for our HGVs and vans. Drivers are assigned scores, which are reviewed by line management with the driver to reduce emissions and vehicle wear and tear by optimising driving techniques.

# Control of risks - hazardous waste management

Augean operates in a highly regulated sector. Each of our facilities requires a consent to construct or expand it (via a planning permission issued by the local planning authority or a Development Consent Order issued by the Secretary of State); as well as an environmental authorisation to operate it (covered by the Environmental Permitting regime in England and the Pollution Prevention and Control and Waste Management Licensing regimes in Scotland).

The regulatory authorities of the planning regime and the environmental protection regimes require significant information at application to be assured that the facilities will be constructed and operated so they do not cause significant risk to human health or the environment.

Each permit or licence to manage waste has many individual conditions that require Augean to manage the wastes it deals with to prevent risks associated with it. These conditions are implemented within Augean as part of our IMS.

Controls start before the waste is received by carrying out preacceptance checks to ensure we can verify the waste type and composition and who has produced it.

All wastes are subject to Technical Assessment before they are dispatched to ensure that the waste is capable of being effectively handled by us; that the appropriate treatment is carried out on the waste; and to ensure that the waste hierarchy is applied. All wastes are checked, tested and verified upon arrival at site to ensure that they are what we expect and can be managed safely by us for treatment followed by recovery or safe disposal in our engineered facilities.

Each site has its own set of procedures that is bespoke to the processes that are used to manage every type of waste received at the site.

Our sites are subject to external verification for compliance and performance, as identified in this report.

### Regulator assessment for each site

GA, Augear

Compliance with environmental regulation is of interest to all stakeholders, whether employees or local communities in respect of their environment or for shareholders and customers through sustainability and reputational issues. The regulator assessments of the performance of each site are therefore a critical indicator for the Group.

### **Environment Agency**

Our English-based sites are scored on their operational performance by the Environment Agency (EA). The Agency annually categorises sites into six compliance bands A to F.

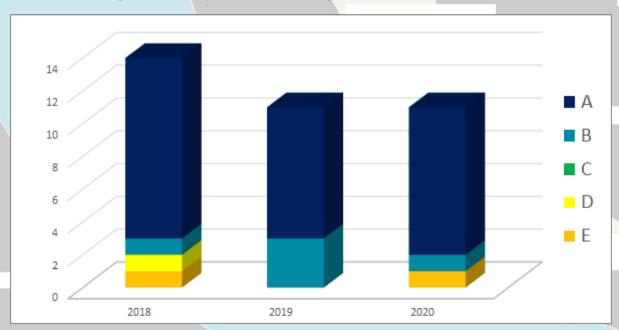
Compliance band and total number of inspection visits for each of our sites are provided below.

Continuous Target
Augean seeks to achieve A to B banding for all English sites.

Site	20	18	20	19	20	20
	Compliance band	No. of inspections	Compliance band	No. of inspections	Compliance band	No. of inspections
Avonmouth treatment centre	Α	1	Α	4	Α	1
Cannock Treatment Centre	A	0		N	/A¹	
East Kent Incinerator	D	3		N	/A <sup>1</sup>	
ENRMF hazardous landfill	A	1	В	3	В	2
ENRMF - Radioactive	Α	0	Α	0	A	0
ENRMF soil treatment centre	Α	1	Α	1	E	1
Great Yarmouth treatment centre	E	2	В	2	Α	0
Mark's Quarry non-hazardous landfill	Α	0	Α	0	A	0
Port Clarence hazardous landfill	Α	1	Α	3	Α	1
Port Clarence non-hazardous landfill	Α	1	Α	3	Α	1
Port Clarence soil treatment centre	Α	1	Α	0	Α	1
Port Clarence waste recovery park	Α	1	Α	0	Α	1
Thornhaugh non-hazardous and SNRHW <sup>2</sup> landfill	В	2	В	2	Α	2

<sup>&</sup>lt;sup>1</sup> Divested from the Group

The scores show strong environmental performance at our English sites with most sites rated A or B.



<sup>&</sup>lt;sup>2</sup> SNRHW – Stable non-reactive hazardous waste (for example, asbestos)

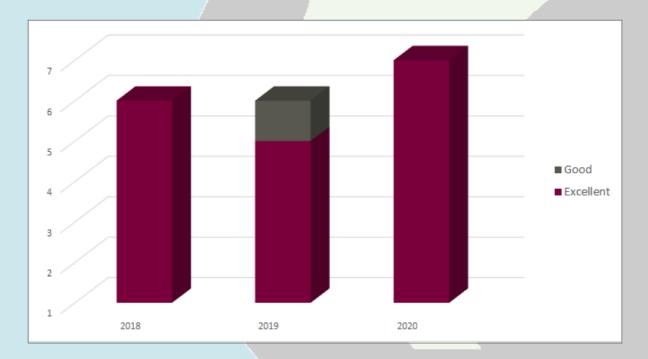
### **Scottish Environment Protection Agency**

Our Scottish sites are scored on their operational performance by the Scottish Environment Protection Agency (SEPA). The performance against each condition is assessed and combined to result in an overall compliance score in one of six categories, from excellent, good, broadly compliant, at risk, poor or very poor.

Continuous Target
Augean seeks to achieve at least 'Good' for all Scottish sites.

Site	20	2018 2019 2020		2019		0
	Compliance Band	No. of inspections	Compliance Band	No. of inspections	Compliance Band	No. of inspections
Blackdog	Excellent	0	Good	1	Excellent	0
Dundee	Excellent	0	Excellent	0	Excellent	0
Greenbank	Excellent	1	Excellent	1	Excellent	0
Lerwick	Excellent	0	Excellent	0	Excellent	0
Paisley treatment centre	Excellent	2	Excellent	0	Excellent	0
Peterhead	N/A	Ac	N/	'Ac	Excellent	0
Pocra Quay	Excellent	0	Excellent	0	Excellent	0

The results of inspections and audits received from SEPA demonstrate high standards and low environmental impact.



### **Enforcement and prosecution**

GRI 307-1, GA

Compliance and environmental standards are aspects of interest to all stakeholders. If a site breaches its permit, then the Regulator may serve an enforcement notice. An enforcement notice specifies the actions the permit holder must take to resolve the non-compliance and within what timescale.

If a permit breach is severe or an operator persistently does not comply with permit conditions, the Regulator may prosecute the operator. The *GRI G4-EN29* indicator requires disclosure of any fines due to environmental offences.

There were no enforcement notices or prosecutions brought in the reporting period.

### External verification of sites

### **Achilles FPAL of ANSS**

Achilles FPAL is an industry based steering group of oil and gas companies. Achilles FPAL membership is an integral part of the industry-wide initiative known as the Supply Chain Code of Practice (SCCoP) which is endorsed by the UK oil and gas supply chain to measure best practice during buyer procurement processes. The audit scores for our oil and gas facing business, ANSS, are below:

(maximum = 10)	Quality	Health & Safety	Environ- mental	Competence & Training
2014 score	9.1	9.0	9.1	8.5
2016 score	9.2	8.8	9.1	9.0
2018 score	9.3	9.2	9.3	9.0

The 2020 audit was delayed by the Covid 19 pandemic until February 2021 and will be reported in our 2021 report.

### **Environmental Management System**

Management systems are an essential mechanism for controlling our impacts and quality across all of our services. It is a condition of our environmental permits and waste management licences that we operate to a formal environmental management system. ISO 14001 covers processes and procedures required to control environmental risks.

Our control systems do not stop once the waste has been safely treated or deposited. All systems are audited by our HSEQ Managers and externally by our regulators and certification bodies to ensure their robustness and continued relevance.

### Number of sites registered to Augean's Integrated Management System (IMS)

Augean

Our sites operate to an IMS, satisfying the requirements of ISO 14001 (Environmental Management System Standard), ISO 9001 (Quality Management System Standard) and OHSAS 18001 (Health, Safety and Welfare Management System Standard).

The IMS is externally certified at all sites, by BSI (British Standards Institution) for Augean PLC sites and SGS (Société Générale de Surveillance) for ANSS sites.

The business will complete progression towards accreditation under the new standard, ISO 45001, for its occupational health and safety management systems in 2021.

# Control of emissions of air, water and land

Greenhouse Gas (GHG) emissions are a major contributor to climate change and are governed by the UN 'United Nations Framework Convention on Climate Change' and the subsequent UN 'Kyoto Protocol'.

Some GHGs are also air pollutants that have significant adverse impacts on ecosystems, air quality, agriculture, and human and animal health. Landfill gas is a significant source of carbon dioxide and methane, both GHGs and Augean has control systems in place to manage landfill gas emissions and other sources of emissions from its processes (see following). This is important because reduction in global GHG is part of the Paris Agreement, which is a legally binding international treaty on climate change that aspires to limit the global temperature increase in this century to 2 degrees Celsius above preindustrial levels, while pursuing the means to limit the increase to 1.5 degrees.

Our environmental permits require that we carry out routine monitoring monthly, quarterly and annually against a prescribed set of determinands to measure emissions to air, land and water to ensure that the operation of the plant will not result in unacceptable risks to human health or the environment. Each permit has its own bespoke set of determinands with trigger thresholds according to the activities being carried out. Our permits are published on our website here:

We have included the results of environmental monitoring for the ENRMF site on the website since 2012, set out in non-technical terms so that the community can see the low level of impact on the environment of the site. The website will be updated in 2021 to include the monitoring data for the Port Clarence site.

### **AIR**

Augean does not landfill municipal solid waste (MSW). Therefore, the amount of landfill gas generated by Augean's non-hazardous landfills is lower compared to operators of landfills that do.

Furthermore, hazardous waste landfills are not permitted to dispose of hazardous wastes with high organic content according to the strict waste acceptance criteria (WAC). So, the amount of landfill gas generated by such facilities is significantly lower than non-Hazardous facilities.

### $NO_{\chi}$ , $SO_{\chi}$ , and other significant air emissions

GRI 305-7

Our operational sites with major processes or landfill are required to report any  $NO_x$ ,  $SO_x$ , and other air emissions that are above the prescribed levels set by the environmental regulator.

The amount of air emissions from our permitted facilities was reported as below the prescribed thresholds at all facilities.

The NO $_{\rm x}$  limit for landfill gas flares at our Port Clarence and ENRMF facilities is 150mg/m³. The Port Clarence non hazardous landfill produced the greatest amount of landfill gas at 5,545 tonnes in 2020. Assuming a density of landfill gas for mature landfills at 0.7kg/m³, this represents a volume of 7,921m³. Given that the reported level of NO $_{\rm x}$  was below 150 mg/m³, the maximum quantity of NO $_{\rm x}$  emitted by any site was 1.19kg and this does not account for any use of gas at the site for power generation.

Amount in tonnes of landfill gas and the proportion of gas being flared, (partial), GA used for power generation or passively vented

To control methane emissions where possible landfill gas is used to generate energy but is otherwise flared. The data below provides an indication of the amount of landfill gas passing through gas management systems and our overall approach to gas management.

Site	Tonnes landfill gas	Proportion flared %	Proportion power generation %	Proportion passively vented %			
ENRMF hazardous landf	ill						
2018	621	90	0	10			
2019	582	90	0	10			
2020	471	0	0	100			
Mark's Quarry non-hazar	dous landfil	l					
2018	1,957	0	91	9			
2019	1,829	0	90	10			
2020	1,707	0	90	10			
Port Clarence hazardous	landfill						
2018	146	0	0	100			
2019	164	0	0	100			
2020	172	0	0	100			
Port Clarence non-hazar	dous landfill						
2018	4,807	0	65	35			
2019	5,546	5	57	38			
2020	5,545	0	51	49			
Thornhaugh non-hazard	Thornhaugh non-hazardous and SNRHW landfill						
2018	559	62.5	0	37.5			
2019	535	61	0	39			
2020	530	58	0	42			

# Intensity of landfill gas reported as CO2 in tonnes per site divided by tonnes of waste handled

GRI 305-4 (partial), GA

This provides an indication of the amount of carbon emitted to atmosphere directly related to the quantity of waste received at our landfill sites.

Site	ENRMF hazardous	Port Clarence non-hazardous	Port Clarence hazardous	Thornhaugh non- hazardous and SNRHW
CO2 (tonnes)/tonnes w	<i>aste</i>			
2018	0.004	0.002	0.0004	0.01
2019	0.001	0.01	0.0003	0.001
2020	0.002	0.03	0.0009	0.005

### LAND

Augean manages wastes that require specialist management capabilities to ensure that it is dealt with safely. This includes hazardous and non-hazardous treatment by various processes, to render the material safe for either landfill disposal or recovery.

Not all of the material that Augean processes is disposed by landfill and none is directly 'released to land'. The disclosed data below identifies various management routes for waste. Only waste that has been disposed to landfill is technically considered to be a 'release to land'.

Augean's landfill cells are engineered by technically competent geo-environmental engineers and provide geological and / or artificial barriers to prevent releases of contaminants to the environment. Each cell requires formal construction quality assurance (CQA) approval by the environmental regulator according to technical standards that meet BAT. CQA must be provided in a CQA Plan prepared by a competent expert and is required for the construction of all aspects of landfill engineering and infrastructure.

### Quantities of wastes managed

GRI 306-2

### Gross mass of waste handled across the Group by type and disposal method

Waste in tonnes	2018	3	2019		2020	
Hazardous	718,702	70%	979,053	76%	811,671.7	70%
Non-Hazardous	306,500	30%	302,453	24%	353,290.7	30%
Gross intensity (haz): gross tCO <sub>2</sub> e/ gross haz handled	NR		NR		0.003	1
Gross intensity (non-haz): gross tCO <sub>2</sub> e/gross non-haz handled	NR		NR		0.007	0
Gross intensity (total): gross tCO <sub>2</sub> e/ gross total waste handled	NR		NR		0.002	1

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### Gross mass of waste handled across the Group by management outcome

Waste in tonnes	2018		20	19	2020	
Recovery	9,541	0.8%	11,531	1.0%	13,577	1.2%
Recycling	14,569	1.3%	20,193	1.7%	2,808	0.2%
Treatment	370,458	31.8%	277,974	23.9%	432,645	37.1%
Incineration with energy recovery	9,950	0.9%	4,089	0.4%	2,991	0.3%
Disposal	609,868	52.4%	951,732	81.7%	705,325	60.5%
Radioactives	10,835	0.9%	15,989	1.4%	7,616	0.7%

The above data is sourced from the returns data that Augean is obliged to provide to the environmental regulators from each site. However, this data includes double counting for wastes that are transferred between Augean's own sites (i.e. the waste is recorded as received at each site on their respective return data). The data provided below has had such duplicates removed, hence reports lower quantities. This data is assessed in terms of diversion from landfill, and conversion of hazardous waste to non-hazardous waste.

### Net mass of waste managed

Waste in tonnes	2018	2019	2020
Total Hazardous (Group)	478,910	604,014	474,645
Total Non-Hazardous (Group)	224,932	185,006	216,803
Total (Group)	703,842	789,020	691,448
Net intensity (total): gross tCO <sub>2</sub> e/net total waste handled	NR	NR	0.0036

This identifies the total amount of waste managed. It does not identify the total amount that was disposed to land. Some of the accepted wastes are immediately diverted from landfill, for other options, for example treatment, whereas, other waste will be sent to a landfill site for further treatment and subsequent disposal or recovery:

### Income waste diverted from landfill

Diverted from landfill	2018	2019	2020	Rolling Average
Hazardous	17%	12%	12%	14%
Non-hazardous	25%	21%	20%	22%

### Treatment of hazardous waste to non-hazardous

At landfill sites, incoming wastes are treated to facilitate either disposal in the landfill cell; or for beneficial use, which may mean use on site for haul roads or construction of landfill features; or for off-site use in restoration.

The following table identified the outcomes of treatment of solid hazardous waste to identify the proportion of waste that is converted to non-hazardous waste.

Total Hazardous waste (all types) Incoming to treatment / landfill pad	2018	2019	2020	Rolling Average
Input Waste Tonnes	348,958	473,501	397,275	
Proportion remaining as hazardous	68%	71%	76%	72%
Proportion leaving as non-hazardous	32%	29%	24%	28%

This data becomes more significant for incoming hazardous waste soils. On-site treatment converts >90% of incoming hazardous soils to non-hazardous. This material is used for recovery.

Total Haz soil Incoming to treatment / landfill pad	2018	2019	2020	Rolling Average
Input Waste Tonnes	91,707	147,766	93,916	The state of the s
Proportion remaining as hazardous after treatment	6%	13%	8%	9%
Proportion leaving as non-hazardous after treatment	94%	87%	92%	91%

### Total solid hazardous waste (disposed) 'released to land'

Total	2018	2019	2020
Hazardous waste disposed to landfill	217,634	358,941	340,626
Intensity: gross tCO <sub>2</sub> e/tonne hazardous waste disposed	NR	NR	0.0073

Released to land' does not mean placed in a manner that is likely to cause unacceptable risk of harm to human health or the environment. These wastes are carefully disposed in fully engineered landfill cells that have been constructed in accordance with CQA and validated by the EA.

### **Exports for recovery**

Augean also exports certain waste streams for recovery where no options are available in the UK.

Exported for recovery (tonnes)	2018	2019	2020
Hazardous	11,332	11,114	7,340
Non-Hazardous	27	54	64
Total	11,359	11,168	7,404

### Total number and volume of significant spills

GRI 306-3

Augean handles and treats a wide range of potentially polluting substances. Spillages of oils, fuels, wastes and chemicals have the potential to result in contamination of the ground, surface water and ground water.

All polluting substances on Augean sites are handled under robust handling procedures on sealed surfaces and stored in contained areas. Significant spills must be reported to the environmental regulator. A significant spill is considered one in excess of 200 litres.

One significant spill occurred in February 2020 during exceptional and unprecedented rainfall conditions. This caused a site drainage water overflow issue from the East Northants Resource Management Facility (ENRMF) which resulted in a localised impact adjacent to the site. The issue was fully investigated and reported to the Environment Agency, with corrective and preventative actions taken including improved flood resilience, taking account of long-term climate change.

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### WATER

All leachate from Augean's landfill operations is collected and safely managed.

### Water conservation

Augean currently operates no surface water discharges.

All effluents that cannot be re-used are either discharged to sewers hence to treatment works or transported directly to treatment facilities. However, effluent is used as a substitute for water in the stabilisation processes at Port Clarence and ENRMF because this conserves water use. In future, we will be quantifying the amount of water that we save by using effluent in our treatment processes.

### Total effluent discharged

Augean

Augean has legal discharge consents at its facilities. The amount discharged is recorded below:

	Trade effluent discharge (m³)		
Site	2018	2019	2020
Avonmouth treatment centre	29,192	26,412	45,308
Greenbank	5,838	5,414	5,874
Paisley treatment centre	35,100	31,527	52,480
Pocra Quay	7,993	6,240	5,180
Peterhead drilling waste centre	N/Ac	N/Ac	330,720
Thornhaugh non-hazardous and SNRHW landfill	3,340	11,173	16,716

# **GHG REPORTING**

# Energy consumption within the organisation

GRI 302-1 (2015)

The current energy consumption figures for the group are detailed below.

Energy Type	kWh	% energy
Electricity	2,217,304	13
Gas	2,936,904	18
Liquid Fuels	6,938,449	41
Transport	4,723,073	28
Total	16,815,730	100

Augean has reported their total energy usage and made recommendations for reduction in energy usage in compliance with Phases 1 and 2 of the Energy Opportunity and Savings Scheme (ESOS); and looks forward to doing the same for Phase 3.

### **Emissions**

GHG emissions are categorised into three groups or 'Scopes' by the most widely-used international accounting tool, the GHG Protocol. Scope 1 covers direct emissions from sources that are owned or controlled by Augean. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by us. Scope 3 includes all other indirect emissions that occur in our value chain.

### Scope 1 emissions

Emissions from combustion of gas (tCO <sub>2</sub> e)	540.86 tCO <sub>2</sub> e
Emissions from combustion of fuel for other activities which the company own or control including operation of facilities	1,708.67 tCO <sub>2</sub> e
Emissions from combustion of fuel for transport and business travel purposes	1,161.55 tCO <sub>2</sub> e

### Scope 2 emissions

Emissions from purchased electricity 779.52 tCO<sub>2</sub>e

### Scope 3 emissions

Our reporting systems are not sufficiently evolved to record this detail yet, but we look forward to expanding our capabilities in the short term to report on data regarding we produce ourselves (as opposed to manage on others' behalf) and more expansive business mileage data.

### **Carbon intensity**

### **Gross intensity assessment**

Gross Waste handled in tonnes	2020
Hazardous	811,671.7
Non-Hazardous	353,290.7
Gross intensity (haz): gross tCO <sub>2</sub> e/ gross haz handled	0.0031
Gross intensity (non-haz): gross tCO <sub>2</sub> e/gross non-haz handled	0.0070
Gross intensity (total): gross tCO <sub>2</sub> e/ gross total waste handled	0.0021

### **Net intensity assessment**

Waste in tonnes	2020
Total (Group)	691,448
Net intensity (total): gross tCO <sub>2</sub> e/ net total waste handled	0.0036

### Intensity of hazardous waste disposed

Total	2020
Intensity: gross tCO <sub>2</sub> e/tonne hazardous waste disposed	0.0073

An intensity metric of gross tonnes  $\rm CO_2e$  to tonnes waste managed is considered to be an appropriate measure given the nature of our business.

### GHG Mitigation strategy and Energy consumption management

The following measures were taken in 2020:

The following measures were taken in 2020.		area were taken in 2020.			
		Action	Benefit	Future	
	Energy		Reduce electricity usage, reduce GHG and improve lifetime of electrical equipment		
	consumption	Electricity supply	Site electrical power is derived from renewable energy sources	Move away from plant powered by diesel and implement electrical power on a wider scale	
	Waste	Office recycling initiatives	Increased dry recyclables' segregation and removed disposable water bottles and cups from our offices	waste we produce ourselves	
	Mark Man the	Planting 20,000 trees at St Marks Quarry	Part of the restoration of the closed landfill site	Calculate potential carbon sequestered by tree planting.	
			Reduce the amount of CO <sub>2</sub> associated with transfer of waste from source to treatment		
	CO <sub>2</sub> emissions	Improve Scope 3 reporting for customers	Provide customers a software platform to calculate their Scope 3 carbon emission data for wastes they send to us to help them analyse the ESG impact of their waste production with associated processes by sharing	Expand the range of customers who use the platform.	
		Monitoring driver performance	Driver performance monitoring to monitor harsh braking, harsh acceleration and harsh cornering for		
			part of our fleet to reduce emissions and vehicle wear and tear by optimising driving techniques.		

### Land management and biodiversity

Augean uses restoration and aftercare systems to contribute to the development and maintenance of biodiversity in the localities of our landfill sites. The restoration schemes for our landfill sites are sensitive to the local ecological situation and aesthetic requirements of local communities.

#### Examples:

- The great crested newt reserve, covering an area of 1.5 hectares at our Thornhaugh landfill site, has continued to thrive.
- Our Port Clarence site is located adjacent to internationally and nationally designated areas of wild fowl interest. There are also valuable habitats within the site comprising scrub and short ephemeral turf covering an area of approximately 80 hectares. The presence of barn owls using nesting boxes provided by Augean is a good indicator of the health of biodiversity in lowland areas as the range of habitats needed by the species is also vital for a wide variety of other animals and plants.

The aftercare schemes for all our landfill sites run for 60 years. Augean sets aside substantial financial provisions during the operation of our sites so that adequate funds are in place to cover the site maintenance and security, running of equipment such as leachate management and landfill gas plants and environmental monitoring of the landfill site and immediate surrounding area to ensure long term establishment of habitats for nature conservation benefit.

# Sites operated adjacent to areas of high biodiversity value and description of impacts

GRI 304-1 GRI 304-2

Augean owns and operates sites near sites of high biodiversity value and nature conservation importance. Monitoring is required in accordance with our permits and consents to demonstrate that the assumptions regarding standards of operation and design made in the consent application stage are appropriate and conclusions validated. The table below summarises the impacts of the sites located near biodiversity receptors.

Site and operation	Biodiversity receptors	Principal, potential impacts	Actual impact significance
ENRMF, Northants Landfill of hazardous and radioactive waste, and treatment of hazardous waste 30 hectares site	Collyweston Wood SSSI. Ancient woodland	Groundwater contamination, noise and airborne dust,	No impact detected at receptors. Long term benefit of restoration
Thornhaugh, Peterborough Landfill of non-hazardous wastes and SNRHW 30 hectares site	Bedford Purlieus SSSI. Ancient woodland	Groundwater contamination	Historic areas of site unlined but impact localised and small. Planning permission gained in 2015 to enable reworking of the unlined area and elimination of the localised impact. Long term benefit of restoration
Port Clarence, Teesside Landfill of hazardous and non-hazardous waste, stabilisation and thermal desorption  100 hectares site	Teesmouth and Cleveland Coast SPA and Ramsar site. Main interest is wintering and passage of waterfowl	Groundwater contamination, airborne dust, noise and atmospheric emissions	Site performing in accordance with design hence no significant impact. Long term benefit of restoration

### Habitats protected or restored

GRI 304-3

Augean contributes directly to biodiversity through landfill restoration projects and indirectly through its commitments to environmental organisations focussed on increasing biodiversity. The areas of land owned and managed for biodiversity are an indicator of our success in this issue and are reported for 2016 2018 and 2020 below:

	Managed for biodiversity			
Site	2016	2018	2020	Status
ENRMF				Includes herpetofauna reserve with ponds and grassland. Grassland enhancement undertaken in 2015 with additional ponds and terracettes created on the northern area of the site in 2016.  Active management programme
30 hectares	2.0 hectares	2.0 hectares	2.0 hectares	in place with monthly visits to ensure areas continue to thrive. An additional 8 hectares of capping and partial restoration including some hydroseeding during 2020 will lead to the release of these areas for increased managed biodiversity in the coming years.
			10 hectares	
Mark's Quarry non- hazardous landfill site	10 hectares	10 hectares	4 hectares was planted with approximately 20,000 native saplings.	Coarse grassland low value habitat to be enhanced with restoration of remainder of the site over the next two to three years
Port Clarence facility 100 hectares	80 hectares	80 hectares	80 hectares An area of 24,000m² was capped on the Non-hazardous phase.	Includes naturally recolonised industrial slags with 13 hectares of species rich short turf together with scrub and pond habitats. In due course the landfill will be restored for biodiversity
				30-hectare site which will be restored
Thornhaugh non- hazardous landfill site 30 hectares	6.0 hectares	6.0 hectares	6.0 hectares	to nature conservation. Current restored areas include two hectares of newt reserve with well-established wetland together with four hectares of grassland and woodland planted with native trees in 2014.

Note: All sites are subject to a long-term management obligation under the relevant Permit.

During 2021, a further 3.5 hectares is earmarked for capping and restoration at ENRMF and approximately 1 hectare at Thornhaugh.



### What we have achieved

- ✓ Continued focus on reducing workplace injuries:
  - o 2020 saw a decrease in accidents compared to 2019, with the number of incidents, including those we are required to report, remaining low for our sector.
  - o Only one incident was required to be reported under RIDDOR (3 in 2019), with one major injury (incidents defined as accident, fire or injury which is deemed significant by our internal accident investigation procedures, but not required under RIDDOR) recorded (4 in 2019).
  - o The number of lost time incidents (LTI) was low at four (7 in 2019) with a reduction in the LTI rate (per 200,000 hours) to 1.2 compared to 1.41 in 2019.
  - Our near miss and safe act reporting in 2020 continued to exceed our target level.

- Increased investment in training for staff, training per head at almost £700.
- All operational staff IOSH trained.
- Health and safety improvement plans are in place at all sites.
- ✓ Donated £789,897 landfill tax credits to local community funds.
- In 2020 we commenced a comprehensive preapplication consultation programme for the extension of the ENRMF site and due to the Covid-19 crisis we extended the consultation period from 6 to 15 weeks to give everyone the opportunity to participate.

# **Our People**

Augean employs a workforce with a wide range of skills and qualifications to deliver its range of services.

The Group employed an average of 317 staff (2019: 392) over the course of the year. The number of employees in the Group decreased significantly during 2020 reflecting the group's view of future trading in the North Sea Services sector.

	Male	Female
Full time	229	44
Part-time	3	6
Fixed term or temporary contract	0	1
Day Rate	32	2
Agency Worker	27	6

### Augean values it employees

Augean values its employees and the commitment that they continue to give. Our Company success is dependent on people working effectively together with common objectives and common values. The Group's employees are vital to the performance improvements outlined in this report. A 3% aggregate general pay increase was awarded to staff and directors in 2020, higher than general inflationary conditions in the UK.

### Benefits and worker satisfaction

We offer various benefits including a salary sacrifice employer matching pension scheme, death in service, other salary sacrifice opportunities such as cycle to work for all employees.

All staff have the right to 'freedom of association'. There were no operational disputes due to workforce action or strikes in 2020, and there never has been in the history of Augean.

### Whistleblowing Policy

The Group's Employee Handbook contains a clear whistle-blowing policy, providing every employee the opportunity to raise concerns anonymously or directly with an impartial director, without the intervention of line management, with protection in accordance with UK employment law. Once an issue is reported the director is required to undertake a thorough investigation and make recommendations. The Company will treat all such disclosures in a confidential and sensitive manner.

### Performance and appraisal

Staff are encouraged to undertake an annual or bi-annual Performance Appraisal with their line manager to provide a formal, recorded, regular review of an individual's performance, and a plan for future development. Appraisals assist in the development of individuals and establish individual training needs, improve organisational performance, and feed into business planning. The appraisal process establishes specific training plans for each individual where appropriate.

To ensure continued success for the Group and development of our workforce we make investment in training both through the provision of external courses and in particular through devoting management time to improve competency within the organisation.

### **Equal opportunity**

The Group is committed to the principle of equal opportunity in employment and to creating a harmonious working environment which is free from harassment and bullying and in which every employee is treated with respect and dignity.

Accordingly, well established policies are in place to ensure that recruitment, selection, training, development and promotion procedures result in no job applicant or employee receiving less favourable treatment on the grounds of race, colour, nationality, ethnic or national origin, religion or belief, disability, trade union membership or non-membership, sex, sexual orientation, gender, marital status, age or status as a part-time or fixed-term employee. The Group's objective is to ensure that individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.

Equal opportunity policies are set out in the Group's Employee Handbook. A copy is provided to each employee on joining the Group and made available electronically on the company intranet. The Handbook is updated periodically for changes in policy and regulations.

Augean operates a Living Wage Policy that states "Augean will not profit from people paid less than living wage" and complements our Equal Pay Policy that is provided in the Employee Handbook. Salaries are determined by job function and ability throughout the Group for each employee category.

As a business with >£36m turnover we introduced a Modern Slavery Policy

2016 to ensure compliance with

Section 54 of the Modern Slavery Act.

### Gender pay gap report

GRI 405-2

The gender pay gap (GPG) is the difference in the average hourly wage of all men and women across a workforce. It is important to note that the gender pay gap is not the same as unequal pay, i.e., paying men and women differently for performing the same (or similar) work. Unequal pay has been unlawful since 1970.

Augean has two separate reporting entities (Augean PLC and ANSS) and neither have >250 employees, therefore, Augean is not required to report the GPG. However, Augean first reported the gender pay gap in 2018, using a combined data set for both entities.

The gender pay gap data for 2020 is presented below. However, the following points are noted, particularly the influence of staff placed on 'Furlough' in accordance with the UK Government's Coronavirus Job Retention Scheme.

- The data does not include those Furloughed as the GPG guidance states to only include 'full pay relevant employees' not those on reduced pay (therefore anyone on maternity is not included, nor anyone on long term sick in the given period).
- The hourly rates are calculated as per the GPG guidance and are inclusive of salary, allowances and bonus – these are calculated over 365.25 days per year as per the CIPD (and therefore government) guidance and therefore show a much lower than the actual hourly rates which are calculated over 260 working days (208 if 4 days per week are worked etc)
- Since our last report Augean has introduced the Performance Incentive Scheme for our frontline employees, which has improved our bonus picture.
- A minus figure shows a positive outcome in favour of female staff

### **Augean PLC Data**

Difference in hourly rate	
Median Gender Pay Gap:	-19.7%
Mean Gender Pay Gap:	17.5%
Proportion who received bonus pay	
Proportion of Females Receiving Bonus	59.4%
Proportion of Males Receiving Bonus	50.7%

### Difference in bonus pay

Median Bonus Gender Pay Gap Mean Bonus Pay Gender Gap

### Proportion of staff in each quartile

	Total	Female		N	/lale
Lower	43	4	9.3%	39	90.7%
Lower Middle	44	10	22.7%	34	77.3%
Upper Middle	44	10	22.7%	34	77.3%
Upper	43	8	18.6%	35	81.4%

-200%

49%

### ANSS Data

### Difference in hourly rate

Median Gender Pay Gap:6.7%Mean Gender Pay Gap:21.9%

### Proportion who received bonus pay

Proportion of Females Receiving Bonus 0%
Proportion of Males Receiving Bonus 20%

#### Difference in bonus pay

Median Bonus Gender Pay Gap 100% Mean Bonus Pay Gender Gap 100%

### Proportion of staff in each quartile

	Total	F	emale	Male		
Lower	15	5	33.3%	10	66.7%	
Lower Middle	15	4	26.7%	11	73.3%	
Upper Middle	15	4	26.7%	11	73.3%	
Upper	15	2	13.3%	13	86.7%	

# Total number of new employees and employee turnover by age group, gen

GRI 401-1 (partial)

turnover by age group, gender, and region

Augean monitors personnel data to determine staff turnover, with a view to appraising the effectiveness of our approach to personnel development and welfare. Augean considers that a high staff turnaround is potentially an indication of a dissatisfied workforce; similarly, from a low turnover it can be deduced that workforce is mainly satisfied with working conditions.

	New Employees				Leaver	s
	2018	2019	2020	2018	2019	2020
Scotland	68	159	56	46	71	159
England	45	140	11	156	53	28
Male	91	257	58	175	108	167
Female	22	42	9	27	16	20
under 30 years old	33	67	22	41	28	40
30-50 years old	60	145	39	98	60	90
over 50 years old	20	86	9	63	36	57
	68%	34%	55%¹			

Note 1: This turnover figure includes 85 ANSS redundancies

The Chartered Institute of Personnel and Development Resourcing and Talent Planning Survey 2020 (for 2019 figures) states an average of 16% turnover and turnover due to redundancies is expected to increase in 2020, given the economic impact of Covid-19. Augean turnover in 2020 increased during a redundancy programme for the ANSS business.

### Workforce diversity survey

GRI 405-1 (partial

To ensure we understand the state of diversity and equality within our Company we conduct a workforce diversity survey annually, the results of which are presented below:

	2	018	2019		2	020
	Male	Female	Male	Female	Male	Female
Management Board	7	0	7	1	8	1
Senior Manager	33	8	26	8	34	16
Manager/ Assistant Manager/ Supervisor/ Team Leader	38	6	31	7	29	3
Frontline Operations (Engineer, Chemist, Driver, Operator)	210	5	250	4	146	5
Customer Services/ Admin	12	33	17	39	6	26
Total	300	52	331	59	223	51

# Amount of money invested in training per head

Augean

To support the attainment of high levels of performance, investment in training and development continued to ensure that all employees had the knowledge, qualifications and skills to operate safely and compliantly within their specific role and in the broader waste management sector. It is pleasing to see that spending on training has been maintained across the group, this reflects Augean's commitment to excellence.

During 2020 an average of £690 (£502 in 2019) per employee was spent on training. In 2019 Augean implemented a Technically Competent Person training programme, which has continued in 2020 to ensure those employed in a technical role have a structured development programme through the business.

Year	Training expenditure per head				
2018	£462.00				
2019	£502.00				
2020	£690.60				

Augean is committed to having a well trained workforce and providing opportunities for both internal and external training for current roles and to also offer opportunities for progression within the group. This is reflected in the expenditure per head for training in 2020.

# **Protecting our people**

Augean expects all sites to work profitably, but not by compromising in any way health, safety or compliance. The directors believe that there is an achievable balance of profitability and high standards and these are the underpinning objectives of the business plans.

The waste industry's overall reportable accident rate; the fatal accident rate; and the major accident rate are all greater than the national average across all industries. Five fatal injuries to waste and recycling workers in the waste sector were recorded for the year 2019/20. Augean reported no fatalities or reportable occupational diseases.

We continue to invest heavily in safety and compliance to ensure that staff and contractors can work safely at our sites. We employ a team of compliance, safety and training managers to support operational staff and continue to invest in training and modern equipment to improve the safety aspects in our work place.

We take our responsibilities for the health, safety and welfare of our employees seriously. It is the priority of all those with responsibility for the health and safety of others, from top management down to supervisory level, to take a proactive approach to safety and to improve our performance year on year. Augean provides to all its workforce a comprehensive and independent occupational health surveillance and management programme. This is to ensure that any occupational health issues are determined as quickly as possible to prevent any longer-term health issues for our personnel.

The Management Board stated its commitment to health, safety and compliance with the following messages which have been promoted widely throughout the business and continued to remain in force through 2020:

# Our Management Board's key beliefs of Health and Safety





During 2020 work continued throughout the Group to raise standards in our approach to health and safety management. For the sixth year in a row all sites have an annual health and safety improvement plan in place, this is monitored on a monthly basis by the board of directors as part of the compliance report, this is also issued to the board.

### Health and Safety reporting

We report accident statistics consistent with GRI metrics. These comprise injury rate, occupational disease rate, lost time incident rate, absentee rate, and work-related fatality for Augean and contracted staff.

Health, safety and compliance remain top priorities for the business. All incidents are recorded and discussed on weekly operational calls involving all sites.

2020 saw a decrease in accidents compared to 2019, with the number of incidents, including those we are required to report, remaining low for our sector. Only one incident was required to be reported under RIDDOR (3 in 2019), with one major injury (incidents defined as accident, fire or injury which is deemed significant by our internal accident investigation procedures, but not required under RIDDOR) recorded (4 in 2019).

The number of lost time incidents (LTI) was low at four (7 in 2019) with a reduction in the LTI rate (per 200,000 hours) to 1.2 compared to 1.41 in 2019. The data is summarised in Figure 1 and presented in the tables below.

# Percentage of sites where if a safety committee is appropriate it is in place

Augean

Augean operates safety committees on all sites of the Group. The meetings are attended by health and safety representatives who are elected by employees to consult on their behalf.

Consulting employees on health and safety matters is very important in creating and maintaining a safe and healthy working environment and culture and is a legal requirement in the UK.

### Covid 19 Pandemic

Following the outbreak of Covid 19 in early 2020 the business formed a Covid 19 working group to ensure the safety of employees, visitors and contractors to Augean sites whilst remaining operational to provide critical services and infrastructure during the ongoing pandemic. All of the Group's sites have remained open throughout the pandemic with non-core staff working remotely and additional control measures implemented at sites in line with government guidance. We established rigorous hygiene controls and procedures at the beginning of the crisis. Although staff absentee rates for 2020 for both manual and non-manual workers increased (compared to 2019) because of the Covid 19, incidences of Covid 19 in staff across the sites have remained low throughout the pandemic with no outbreaks affecting site operations.

### Number of reportable incidents per site

Augean

We are required to report certain injuries, incidents and work-related diseases under The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

	Number of RIDDOR-reportable event				
	2018	2019	2020		
Aberdeen recycling and treatment centres	0	3	1		
Avonmouth treatment centre	1	0	0		
Dundee decommissioning centre	N/Rec	0	0		
ENRMF hazardous landfill and soil treatment centre	0	0	0		
Great Yarmouth treatment centre	0	0	0		
Industrial Services	0	0	0		
Paisley treatment centre	2	0	0		
Peterhead drilling waste centre	N/Ac	N/Ac	0		
Port Clarence landfill site	0	0	0		
Port Clarence waste recovery park	1	0	0		
Thornhaugh non-hazardous and SNRHW landfill	0	0	0		
Wetherby head office	0	0	0		
TOTAL	4	3	1		
RIDDOR rate per 200,000hrs worked	2.0	0.8	0.25		

The number of reported incidents remains very low across the Group. Only one incident that met the definition of reportable under RIDDOR was recorded in 2020. This was subject to full incident investigations with corrective actions followed up with the health and safety investigation procedures in accordance with our IMS and reported to the Board.

### Major accident rate per site/Medical treatment case

Augear

This indicator enables us to attribute significance to those events which, although potentially not required to be reported in the context of RIDDOR, are still significant in their nature. Such incidents are defined as accident, fire or injury which is deemed significant by our internal accident investigation procedures.

	М				
	2018	2019	2020		
Aberdeen recycling and treatment centres	0	3	0		
Avonmouth treatment centre	1	0	0		
Dundee decommissioning centre	N/Rec	0	0		
ENRMF hazardous landfill and soil treatment centre	0	0	0		
Great Yarmouth treatment centre	0	0	0		
Industrial Services	0	1	0		
Paisley treatment centre	0	0	0		
Peterhead drilling waste centre	N/Ac	N/Ac	0		
Port Clarence landfill site	1	0	1		
Port Clarence waste recovery park	0	0	0		
Thornhaugh non-hazardous and SNRHW landfill	0	0	0		
Wetherby head office	0	0	0		
TOTAL	4	4	1		
Normalised to 200,000 working hours	1.00	1.00	0.25		

Note: All medical treatment cases involved males. It is not possible to calculate injury rates for contractors as working hours are not available.

### Lost time and absentee rates

Augea

The Chartered Institute of Personnel and Development, in partnership with

that lost time due to absence

was on average 5.8 days per employee.

Augean actively seeks to reduce its lost time and absentee rates through proactive management of health and safety but also by understanding the causes of absenteeism, such as stress or job dissatisfaction. Lost time incidents (LTI) are recorded when an employee has a day or more off excluding the day of the incident.

Year	Average absentee rates for non- manual workers	Average absentee rates for manual workers	Lost time incidents	Lost time incident rate
2018	1.85	4.30	6	1.50
2019	1.30	3.70	7	1.41
2020	3.51	6.99	4	1.17

Note: LTI rate is the number of LTI per 200,000hrs worked

The absentee rates for 2020 increased due to the Covid 19 pandemic.

The number of lost time incidents reduced in 2020 and remains very low across the Group.

### Incident and injury type

Augear

Analysis of incident statistics enables critical examination of the hazards and risks faced by employees and helps the business to seek to identify preventative measures to reduce incident frequency.



The largest proportion of incidents related to person error. This led to a re-focus of training on safety critical tasks and improving the safety awareness of visitors to Augean sites.

# Number of prohibition and improvement notices per site

Augean

Augean operations have not been the subject of any prohibition or improvement notices during the period of reporting.

### Targets for improving health and safety

### Safe act and near miss reporting

Augean

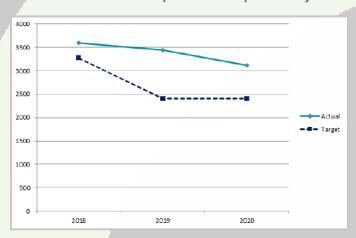
A key tool in reducing risks is the near miss and safe act reporting which helps identify and rectify unsafe conditions or acts and promotes working safely. It is a key safety management tool and provides valuable early-warning information.

### Continuous Target

The Group has a target of one near miss / safe act reported per operational employee and one per office per month

Our near miss and safe act reporting in 2020 continued to exceed our target level.

Near miss and safe acts reported for the past three years



The reduction in the overall number of near misses and safe acts target was due to a reduction in staff numbers across the group.

### Safety training and competence

Site Managers are empowered through both training and support from the Group's HSEQ Managers. Site Managers are the key driving force for culture change and safety improvements at ground level. Key safety issues on the ground continue to be tackled through the delivery of monthly safety campaigns. This approach has been successful in improving our safety awareness and in engaging the workforce in positive safety culture.

All operational staff receive IOSH (Institution of Occupational Safety and Health) working safely training as a minimum with all supervisory staff receiving IOSH managing safely training. We also have several NEBOSH (National Examination Board in Occupational Safety and Health) qualified staff across the group both in HSEQ and operational roles.

Augean continues to engage with our suppliers to highlight the part that they play in the safety of our staff.

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### Minor incident rate per site/ First aid case

Augean

Augean has operated systems for the recording and investigation of minor incidents since 2006. A minor incident is defined by Augean as an accident resulting in minor injury (a first aid case that does not require hospital treatment or involve time off from work) or minor damage to infrastructure or equipment (e.g. vehicles). Common examples might be a cut finger or minor bruising.

Any injury or damage, no matter how slight, results in a near miss being reclassified as a minor injury/incident. In part, this arises from a focus on workplace pedestrian safety, so that any vehicle/vehicle or vehicle/structure collision is now treated as if a pedestrian could have been involved.

It is important that such accidents are reported so that corrective action can be taken to prevent reoccurrence and potentially more serious accidents.

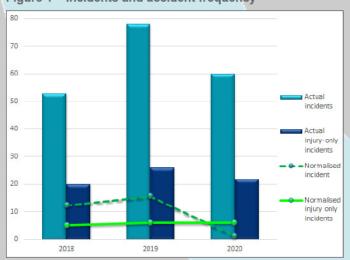
	Minor incident count			
	2018	2019	2020	
Aberdeen recycling and treatment centres	4	15	19	
Avonmouth treatment centre	14	13	9	
Dundee decommissioning centre	N/Rec	12	2	
ENRMF hazardous landfill and soil treatment centre	1	1	2	
Great Yarmouth treatment centre	5	4	3	
Industrial Services	0	10	3	
Paisley treatment centre	5	5	8	
Peterhead drilling waste centre	N/Ac	N/Ac	0	
Port Clarence landfill site	6	7	5	
Port Clarence waste recovery park	1	5	8	
Thornhaugh non-hazardous and SNRHW landfill	3	1	0	
Wetherby head office	0	1	0	
TOTAL	49	62	59	
Normalised to 200,000 working hours	12	15	14.7	

Note: Contractor minor injuries are likely to be significantly under-reported so have not been presented.

We shall continue to encourage contractor reporting.

There was a slight reduction in the number of minor injuries and incidents compared to 2019, which is extremely positive, given the increased rigor in scrutiny and reporting that was applied to such injuries and incidents at each site.

Figure 1 - Incidents and accident frequency



Note: The number of incidents is normalised to 200,000 hours worked

# **Health and Safety Management – External verification**

We do not take our internal systems for granted and validate our management of health and safety (alongside quality and environment) through external verification. We are regularly audited by our certification bodies, BSI or SGS.

External verification ensures that we do not take an insular view to health and safety. It introduces new approaches and enables benchmarking against the industry. Periodically we invite other external verifiers to benefit from different viewpoints and specialisms of different experts. At the end of 2020 and into early 2021, we successfully completed the migration from OHSAS 18001 to ISO 45001 and await formal certification, which we will report on in 2021.

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# **Our Community**

### Our responsibility

We consider ourselves to be part of any community in which we operate. We strive in all our operations to provide a positive contribution to the community and to be a good neighbour.

### **Community investment**

Augean invests in our local communities because they are important to us. Through the Landfill Communities Fund (LCF) we contribute to many local initiatives and will continue to support the communities in the areas in which we operate. This process is managed by Grantscape for our southern sites and by the Teesside Environmental Trust for our northern site. These independent bodies ensure objectivity in decision making and full accountability of the distribution of funds.

Our landfill site at Port Clarence continued to contribute to the Salthome International Nature Reserve in the Tees Valley. The reserve has transformed an area of industrial wasteland and landfill to an internationally significant bird reserve and wildflower meadow and has been supported by Augean since 2004.

Our southern sites at ENRMF and Thornhaugh have contributed to several projects during 2020. The Kings Cliffe and Thornhaugh Environmental Associations were formed so that local people could bring their ideas on how Landfill Tax Credit funds should be spent. The Associations provide independent and objective verification to ensure that funds that are allocated are for genuine projects that will make a real difference to the local community.

Augean supports its communities in other ways. It is Company policy to use local suppliers and to employ local people where they meet the Company requirements.

£432,444

Augean South -Landfill Community Fund £311,587

Augean North -Landfill Community Fund

£37,321

Augean South - LLW Fund £8,545

Direct Community sponsorship

£789,897

### 2020 activities

The Covid 19 lockdown restrictions in 2020 prevented more widespread community projects from taking place in person. However an example of where direct funding has benefitted community projects is:

### The 'Saltholme Washlands project'

This project has ran now for a number of years, with earlier phases refurbishing and constructing new hides, and this latest phase in 2020 re-landscaping and creating / enhancing habitat in two areas of the site (Paddy's Pool and the Main Lake).

These not only enhance the site, and therefore the Tees estuary for wildlife, but also provide a greater spectacle for visitors, both specialist bird watchers and general visitors alike. The aim over the last few years has been to attract a new, younger, and more diverse audience, and several projects in this respect have also been funded by contributions from Augean.

This includes the creation of a dragonfly safari, where visitors can see up close a greater breadth of the wildlife of the site, in addition to birds. There has also been installation of a range of interactive senses children's games around the main lake, and another game which helps children to understand more about migration. The latter was installed in one of the new hides.



### Community engagement

Augean operates an open-door policy at all of its sites. Members of the public can visit by arrangement with the local site management. ENRMF and Port Clarence continued to host visits by local politicians, the media and the public until the outbreak of the Covid 19 pandemic, which prevented site access for non-essential visitors.

To assist us in community liaison we periodically publish a community newsletter. This has proven effective in informing those who live closest to our sites on how we operate and on our development proposals and helps promote discussion on issues that are important to the community.

We have continued to engage with the local community through our other mechanisms including the liaison groups, parish councils, website and social media.

The Company website is set up to provide information and opportunities for feedback, including topic sheets on frequently raised issues, details about our applications and information leaflets.



In 2020 we commenced a comprehensive pre-application consultation programme for the extension of the ENRMF site. Due to the Covid-19 crisis this has been held on-line and the consultation period extended from 6 to 15 weeks to give everyone the opportunity to participate. The application will be made in 2021. We shall continue to liaise with the community throughout the process.

### Operations with local community engagement

Site	Liaison Committee	Community engagement programme	Community funding	Other
Aberdeen			Yes	
Avonmouth		Yes	Yes	
ENRMF	Yes	Yes	Yes	Monitoring data on website, public open days
Paisley		Yes		
Port Clarence	*	Yes	Yes	**
Thornhaugh	Yes	Yes	Yes	

- a liaison committee has been proposed to the planning authority for Port Clarence and was due to commence meeting in 2020, however, this was not possible because of the Covid 19 pandemic.
- \*\* The Port Clarence monitoring data will be published on the Augean website from 2021

### Number of environmental grievances

GRI 103-2

Complaints are an indicator of our perceived and actual impact on our local community by our local community, and indeed by other stakeholders. Augean operates a Group-wide complaints procedure under the IMS. Each complaint received is recorded, investigated and remediation action taken as appropriate. Numbers of complaints made to each of our sites are provided below from the full year after acquisition.

As in previous years our performance with regards to complaints has been very strong during 2020, the very small number of complaints were addressed immediately and followed up with the complainant to ensure no further issues.

Site	2018	2019	2020
Aberdeen recycling and treatment centres	0	0	0
Avonmouth treatment centre	2	0	0
Dundee	0	0	0
ENRMF hazardous landfill and soil treatment centre	0	0	5
Industrial Services	0	0	0
Mark's Quarry non-hazardous landfill	0	0	0
Paisley treatment centre	0	0	0
Peterhead drilling waste centre	N/Ac	N/Ac	0
Port Clarence landfill	0	1	2
Port Clarence waste recovery park	0	0	0
Thornhaugh non-hazardous and SNRHW landfill	0	0	1

The rate of complaints for the ENRMF facility increased because of the current application to extend the operational lifetime of the site, which has heightened local interest.

This was ongoing though 2020 with the application proposed for submission in 2021. All complaints associated with the consent application process are required to be dealt with and recorded in the Communications Report that will be submitted with the application.

# CORPORATE GOVERNANCE AND PERFORMANCE

### What we have achieved

- Adjusted profit before taxation increased to £19.3m (2019: £19.2m).
- ✓ 15% growth in sales from residues from Energy from Waste (EfW) and other incinerators despite biomass incinerators being shut in quarter two due to lockdown.
- A full review of ethical standards and policy was carried out by the Audit Committee.
- Improved margins contributed to small profit growth despite the impact of Covid 19 in reducing sales.

- ✓ 31% of annual spending with local companies.
- Customer feedback shows that over 97% of our customer would recommend us.
- Our service indicators show continued maintenance of high standards of customer service and customer feedback scores rated the overall satisfaction of Augean as 4.6 out of 5.

# **Our Performance**

The underlying trading in all the Group's businesses was positive and robust although the Covid 19 pandemic affected the construction and biomass sectors in Quarter 2; and additionally our North Sea business was adversely impacted for the second half. As a result, the Group delivered a small growth in adjusted profit before tax to £19.3m (2019: £19.2m) a very credible achievement given the Covid-19 impact in quarter two alone, demonstrating the underlying resilience of the business.

### Economic value generated and distributed

Site	2018	2019	2020
Revenues	67	107.1	91.7
Opex	55.7	63.0	58.1
Employee costs	16	24.2	13.1
Payments to providers of capital	0.7	0.7	1.2
Community investments	0.56	0.92	0.79
Payments to governments	0.4	(2.6)	3.2
Economic value retained	8.6	(12.8)	13.3

### **Business integrity**

The PLC Board comprises an Executive Chairman, the Group Finance Director, the Chief Operating Officer and three Non-Executive Directors. The Executive Chairman has primary responsibility for the overall leadership of the Board and its effectiveness. The Non-Executive Directors bring specific areas of knowledge and expertise to the PLC Board and exercise their duties in good faith based on judgements informed by their professional and personal experience to ensure that rigour is applied to board decisions.

The Executive Chairman oversees the operating business through the Management Board, comprising the Group Finance Director, Chief Operation Officer, Commercial Director, Business Planning and Optimisation Director, Environmental Planning Director and Corporate Stewardship Director. The Management Board is responsible for the day-to-day operation of the Company and delivery of the strategic plans and initiatives, and the Group General Counsel is responsible for compliance with legal and governance matters. More information about the PLC and Management Boards together with Company governance can be found on the Augean website at

The Management Board formally communicates weekly. Specific Management Board meetings addressing ESG issues comprise:

- Monthly Board Meeting At which economic health and safety, environmental, and social performance and risk are monitored
- Quarterly Compliance Review At which health, safety and environmental standards are discussed and issues are addressed.

The meetings are attended by a PLC Non-executive Director as scrutineer.

### Audit Committee

The Audit Committee comprises the Non-Executive Directors. The external auditors and the Executive Directors are regularly invited to attend the meetings and the Committee also has access to the external auditor's advice without the presence of the Executive Directors. The Committee met on five separate occasions during the year.

The scope of the Committee includes the adequacy and effectiveness of the risk management and control systems of the Group and requested updates to the Group's corporate risk register. It also reviews the scope and results of the annual external audit, its cost effectiveness and the objectivity and independence of the external auditor.

The Committee monitors the integrity of the financial statements of the company, including its annual financial statements and other information included in the annual report, the interim financial statements, all formal announcements relating to results and all significant financial reporting issues and judgements contained therein.

A full review of ethical standards and policy was also carried out, including for example the Anti-Tax Facilitation, Anti-Bribery, Whistleblowing and Modern Slavery policies. Recommendations were made to the PLC Board for any changes it considered necessary.

### **Nomination Committee**

The Nominations Committee comprises the Non-Executive Directors. It meets as required to review the structure, size and composition of the Board. It is responsible for the selection and recommendation of suitable candidates for appointment to the Board and for ensuring that there is a formal, rigorous and transparent procedure for the appointment of all new directors to the Board.

During the year the Nominations Committee kept under review the leadership and governance needs of the organisation, both executive and non-executive.

This was done with a view to ensuring the continued ability of the organisation to compete effectively in the marketplace, giving full consideration to succession planning for directors and other senior executives in the course of its work, taking into account the challenges and opportunities facing the Company, and the skills, experience, independence, knowledge and diversity needed on the Board in the future.

### Renumeration Committee

The Remuneration Committee comprises the Non-executive Directors. The principal objective of the Committee is to attract, retain and motivate talented people with a competitive package of incentives and awards linked to Group performance and aligned with Shareholders' interests.

The Committee met on five occasions during 2020, with business including reviews of the remuneration for Executive Directors, decisions relating to bonus awards and attainment, and the exercise of options under previously awarded and vested Long Term Incentive Plans. The Directors' Remuneration Report includes the outcome of these considerations.

The Committee uses the services of independent external advisers as required.

The terms of reference for the above committees can be found on the company website.

### Augean plc anti-bribery and corruption policy

Augean plc has ensured that rigorous procedures are in place to prevent bribery in the course of conducting business. These are provided in the Employee Handbook and the Anti-bribery Policy is also published on our website

responsibility of maintaining ethical standards in the way that the company conducts itself in its business rests with the Board.

Augean plc is committed to carry out its business in a fair, open, ethical and honest manner, and does not tolerate bribery under any circumstances as a means to gain any business advantage or return. The board of directors believe that the rejection of bribery is consistent with good business, in the same way that we are fully committed to high standards of health & safety and compliance.

By rejecting bribery the company will maintain its strong reputation for providing a high quality of service to our customers, retain the confidence of our suppliers and reassure our shareholders, partners and other stakeholders.

Employees are encouraged to report bribery activity whenever they discover it in the knowledge that protections are in place should they need them. The Company will treat all such disclosures in a confidential and sensitive manner. The whistleblowing policy is available in the Employee Handbook and on the company intranet.

The company's success in maintaining its approach to preventing bribery will be monitored on a regular basis, including:

- An annual update to the board on the risks faced by the
- The reporting of any bribery-related activity to the board in the Group Finance Director's report.
- A review of new risks associated with bribery by the directors as part of the monthly review of the company risk register.
- The immediate notification to the Group Finance Director of any allegations of bribery-related activity by any employee or third party.

### Tax Policy

Augean plc operates in accordance with an Anti-Facilitation of Tax Evasion Policy, which is available on the company website https://www.augeanplc.com/tax-evasion-policy/.

This requires the company to conduct all our business in an honest and ethical manner. We take a zero tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country.

It applies to our approach to landfill tax. However, we monitor the wastes on which tax is paid and where we provide evidence to show that we have paid too much tax, we reserve the right to make a claim and a claim for overpayment was lodged in 2020. We received notification in November 2020 that HMRC will be repaying £1.6m of Landfill Tax to the Group. This is a small part of our overall claim of overpayment and we continue to engage with HMRC to further recover overpayment of landfill tax.

### **Risk Management**

The Group uses a range of resources to manage and mitigate its risks, including the adoption of a broad range of internal controls, the use of risk registers and regular reporting, monitoring and feedback of risks through the business. Further detail is provided in the Annual report

Risk description	Mitigation
Covid-19 Pandemic	<ul> <li>Implementation of the Covid-19 Management Plan and Risk. Assessment procedure at each site.</li> <li>All staff that can work from home do.</li> <li>All sites have been equipped to be Covid-19 compliant.</li> <li>All operational staff have been trained to cover for multiple tasks to minimise risk from absenteeism due to Covid-19.</li> <li>Minimisation of visitors to site and social distancing.</li> </ul>
Oil price decline / decline in North Sea activity	<ul> <li>Reduced cost base.</li> <li>Reduced headcount by over half.</li> <li>Site rationalisation.</li> <li>Change in senior management team and re-focus.</li> </ul>
General Economic risk  The performance of the business is linked to economic activity in the waste markets it serves, including the manufacturing, construction, nuclear decommissioning, Energy-from-waste and oil & gas sectors. Fluctuations in the UK economy in general and these sectors in particular affect Group performance, as do inflationary and other cost pressures.	<ul> <li>Diversification of customer base.</li> <li>Linking gate fees and other customer charges, wherever possible, to prevailing operating costs and commodity prices, including the costs of waste disposal outside of the Group.</li> </ul>
Transport disruption  The Group relies on the delivery of wastes to its sites to secure revenues and any disruption to local or national networks, for example in severe weather conditions, can cause delays or lost revenue for the Group.	<ul> <li>Outsourcing of the majority of the Group's haulage requirement, augmented with the use of the Group's own fleet where appropriate.</li> <li>Maintenance of ability to accept wastes into sites in different geographical locations before onward transfer to their final treatment or disposal destination.</li> </ul>

### Risk description

#### Health and safety

The activities of the Group involve a range of health and safety risks, from offshore operations to the handling of hazardous wastes.

### Mitigation

- Health and safety is the first priority for all directors, managers and employees across the Group.
- Investments in relevant assets and resources are made on an ongoing basis to ensure that the highest health and safety standards are applied.
- Health and safety performance is constantly monitored and reviewed, including formal reviews at each Augean plc Board meeting and in-depth quarterly reviews by the Group's Management Board. These mechanisms also include detailed reviews of any relevant incidents, which allow the lessons learnt from such incidents to be fed back to local teams, in order to reduce the likelihood of recurrence
- The Group employees suitably qualified professionals to advise, monitor and assist all elements of the business to ensure risks to our employees are appropriately assessed and mitigated.
- Health and safety training is carried out as a matter of normal business, from policy workshops through to individual employees including via online material to facilitate ease of access.

#### **Environmental legislation**

Regulation is a key driver of the hazardous waste market. Changes in legislation (including tax legislation with environmental goals) or its interpretation can have a significant and far reaching impact on waste markets. The simplistic application of the waste hierarchy to the markets in which the Group operates, with its focus on reducing the volume of waste disposed to landfill, could be perceived as a threat to the business in the long term.

- Employ high quality technical management to interpret the evolving legislative framework and its potential and current impact on the Group's operations.
- Maintain a presence on industry groups to influence the shaping of policy and liaise regularly with relevant regulators and legislative bodies, including the EA, SEPA, DEFRA and the Department for Business Energy and Industrial Strategy (BEIS).
- Highlight, the importance of Best Overall Environmental Outcome (BOEO) to our customers in moderating the simplistic application of the waste hierarchy by regulators.
- Whilst European and national legislation encourages "zero landfill" solutions for a range of waste streams, disposal in properly engineered and permitted landfills continues to be the most appropriate waste management solution for many hazardous wastes.

### Tax legislation

The use of tax legislation to drive environmental objectives, particularly the diversion of wastes away from landfill disposal and towards greater treatment and recycling, represents a risk in all time horizons. Landfill tax guidance (LFT1) was last updated in April 2020. LFT is not totally prescriptive on the tax treatment of the many alternate types of waste received by the group. This could lead to differences in opinion on the treatment and the applicable tax rate. The standard rate of landfill tax rose to £94.15 per tonne on 1 April 2020 and will continue to rise in line with the retail price index. The group is in ongoing discussions with HMRC with respect to whether it has paid the correct amount of landfill tax.

- Develop a range of waste treatment solutions for customers.
- Broaden capabilities to ensure the Group's sites are able to accept all those wastes which do require landfill disposal.
- Maintain specialist testing facilities and seek appropriate external chemical, engineering, taxation and legal advice.
- Modelling of the financial impact under different external legislative positions.
- Specialist legal and environmental advice.
- Landfill tax internal audits and external assurance on processes.

### **Risk description**

#### **Environmental compliance**

All operating sites and activities are regulated by environmental authorities in line with the requirements set out within licences and permits. These licences and permits are required to carry on the business of the Group and compliance with their terms is essential to its success. Withdrawal or temporary suspension could have a significant impact on the Group's ability to operate.

#### Mitigation

- Adherence to the highest environmental standards.
- Maintenance of good relations with local communities and to satisfy customers that the techniques, practices and procedures adopted by the Group are consistent with those of a responsible business.
- Employment of technical experts who work to well-established policies and procedures described in the Group's Integrated Management System.
- Provision of training to develop the knowledge and competence of our staff to ensure we retain people with the appropriate skills and behaviours to fully contribute to the future success of the business.
- Regular monitoring and review of compliance performance to protect the Group's good reputation as an ethical and safe company.
- Counterfeit, Fraudulent and Suspect Items ("CFSI") Policy to be introduced in 2021

#### Price risk

Price pressure remains a key feature of the hazardous waste market, where customers often have a range of options for the ultimate disposal of their wastes and access to several companies competing to service their needs.

- Review pricing policies on an on-going basis to ensure that the Group influences and stabilises the market.
- Respond to emerging trends and customer needs.
- Specialist in-house resource to assesses and price waste consignments in line with market rates and available disposal solutions.
- Regular review of all services to ensure that price changes in the market do not lead to uneconomic activities being undertaken by the Group.

### **Economic growth**

The Group relies on economic activity in the UK, which in turn leads to production of the hazardous wastes which form the basis of its sales revenues. Any downturn in the UK economy may restrict the volume of hazardous wastes produced and therefore constrain the Group's revenues.

- Develop positions in a range of markets requiring specialist waste management capabilities and which have high barriers to entry.
- Identify and invest in the techniques, assets and resources to provide a broad range of services to customers, diversifying the revenue base of the Group.

#### **Technological factors**

Technological risk factors may cause treatment technology in use to become obsolete or too costly to maintain.

- Monitor the development and application of the waste hierarchy vs Best Overall Environmental Outcome.
- Invest selectively in development.
- Employ strategic planning to make timely investments in existing and new equipment.
- Evaluation of operational costs and market environment is made before investment.

#### North Sea oil and gas investment

With a well-established business focused on providing waste management services to North Sea oil and gas operators, the Group has some exposure to any fall in investment for oil and gas exploration activity in the North Sea. This may in turn reduce the volume of waste available for management by Augean North Sea Services.

- Maintain a comparatively low level of operational gearing, with the business therefore able to adjust its significant direct cost base in the event of a significant and permanent reduction in revenues.
- Diversify North Sea activities across several revenue-generating streams, with services provided to production customers offshore and onshore.
- Pursue North Sea decommissioning as new market opportunities for ANSS that would further mitigate against risk.

### **Brexit risk**

Although the group is focussed on wastes arising in Britain and uses disposal infrastructure almost entirely based in the UK, the Group may fail to manage the potential impact of Britain leaving the European Union, notably potential increases in interest rate.

- Establish new routes outside of Europe.
- Minimise Inventory.
- Monitor market conditions to allow appropriate investment in infrastructure and management of costs.
- Maintenance of ability to accept wastes into sites in different geographical locations before onward transfer to their final treatment or disposal destinations outside of Europe.
- Modelling of the financial impact of different scenarios which could result from this external change.

### Regulatory Affairs – managing risks associated with legislative change

Augean is actively involved with sector organisations to allow us to understand and influence our markets, the regulatory climate and sector operating standards. This allows us to plan and mitigate any risks from forthcoming legislation or guidance that may impact us. Accordingly, Augean maintains membership and takes an active role in the following organisations and groups:

- Environmental Services Association (ESA)
- Chartered Institution of Wastes Management (CIWM) Steering Committees
- Environment Industries Commission
- Road Haulage Association
- The Nuclear Decommissioning Authority's (NDA) National LLW Programme Stakeholder Group
- The EA Landfill Regulation Group, and other strategic EA sub-groups

- Defra's Hazardous Waste Stakeholder Forum
- Defra's Chemicals Stakeholder Forum
- Decom North Sea

Through these organisations Augean has signed up to the following commitments and charters:

- ESA Accident Reduction Charter
- The Right Waste Right Place campaign

We work closely with our regulators, government and the industry in promoting modern standards and technology. We provide training, give lectures and engage with the development of guidance and regulation.

### Service excellence

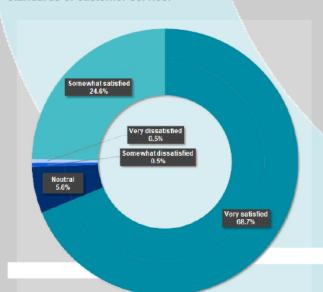
As the UK's leading specialist manager of hazardous waste, we advise and help our clients every day, assisting them in understanding and complying with the complex legal and technical requirements for the safe management of specialist waste streams including hazardous and radioactive wastes. Waste is an issue for every business, but it doesn't have to be a problem.

Augean is committed to delivering excellence in customer service. To ensure we sustain this standard, all facets of the business, including sales, customer services and customerfacing operational departments, operate to ISO 9001. The Group continues to successfully achieve high standards of performance as assessed during all maintenance assessment visits conducted by BSI and SGS, our chosen certification providers.

### **Customer feedback scores**

Augean

Our service indicators show continued maintenance of high standards of customer service.



We collate customer feedback scores on fourteen different parameters, ranging from meeting customer needs, price, professionalism and customer service etc., asking for a rating from one to five based upon: one being very dissatisfied, to five being very satisfied.

The 'overall satisfaction' with Augean was rated as 4.6, from 195 responses.

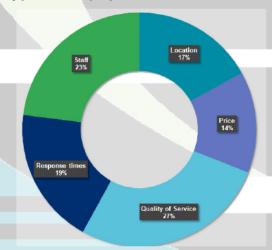
### **Target**

From 2021, Augean will set a target to maintain a minimum overall customer feedback score >4.0, with any score of 3 or less being investigated.

### Reason for selecting Augean

Augean

This is an important question because it enables us to identify where we are providing the best value to our customers compared to our competitors. The main reasons that our customers choose us are the quality of service and our staff, and this, combined with the customer feedback that over 97% of our customer would recommend us, makes us proud as a company and very proud of our people.



### Number of client complaints

Augean

Site	2018	2019	2020
Aberdeen recycling and treatment centres	0	0	0
Avonmouth treatment centre	0	2	1
Dundee	0	0	0
ENRMF hazardous landfill and soil treatment centre	1	0	0
Industrial Services	0	1	1
Paisley treatment centre	3	2	0
Peterhead drilling waste centre	N/Ac	N/Ac	0
Port Clarence landfill	0	0	0
Port Clarence waste recovery park	0	0	0
Thornhaugh non-hazardous and SNRHW landfill	0	1	0
Total	4	6	2

The low level of customer complaints recorded historically across the group was maintained during 2020, which showed a reduction in complaints compared to previous years (6 in 2019). All these complaints were resolved to the satisfaction of the customer within the timeframes specified in the company complaints procedure.

# Percentage of complaints responded to verbally within one day target

Augean

Our complaint procedures require a verbal response to a complainant within one day of receipt. This facilitates a greater understanding of their grievance which assists us in determining a programme of action to resolve the issue. During 2020, all customer complaints were responded to verbally within 24 hours of receipt.

### Percentage of complaints responded to in writing within 28 day target

Augean

Our complaint procedures require that we formally write to complainants within 28 days of receipt of a complaint. This enables us to communicate further with the complainant to reassure them that we have addressed the issue appropriately and to provide them with details of the effective corrective and preventative actions taken to prevent a reoccurrence.

All complaints received during 2020 at Augean were responded to within the 28 day target.

### Supply chain respect

To complement our expertise and experience Augean seeks services from a wide range of suppliers. Over the life of the company we have built a team of trusted external advisors who understand the business and provide consistent, high quality and pragmatic advice. Our advisors work closely with Augean teams creating collaborative working relationships.

Due to the specialist nature of the business, supplies may need to be sourced across the UK or even from abroad. But Augean sources its goods and contractors from local suppliers seeking to support the local economy wherever possible.

# Proportion of spending on local GRI 204-1 suppliers at significant locations of operation

Investment in businesses local to sites is a matter regularly raised by local communities, therefore Augean operates a policy of favouring local suppliers within a 10km radius of site where the standard of service and the quality of the goods is appropriate. In 2020, 31% of our annual spend was with local companies.

### **Future aspirations**

From 2021 we will be seeking to improve our ESG disclosure aligned to the UN's Sustainable Development Goals (SDGs) and we will set meaningful and challenging targets and carbon reduction commitments against a baseline year. This will be part of a longer term strategy associated with Net Zero.

Some of our aspirations include:

Long term target for reducing reliance on fossil fuelled powered plant at sites in favour of green-tariff electricity power;

Implementation of electric vehicle charging points at our head office and key operational sites;

Expanding the scope of Scope 3 emission reporting and the engagement of customers with the ESG data reporting platform to assist in managing their emissions;

Assessment of our obligations for climate risk reporting using guidelines from the Task Force on Climate-related Financial Disclosures;

ISO 45001 certification will be implemented across all sites;

Merging the two separate IMS systems for Augean PLC and ANSS into one single IMS for the Group;

Site-level HSEQ Improvement Plans will be implemented for 2021 to cover all sectors of the business to include lessons learned by understanding the underlying trends in 2020 and previous years;

Employee Training on Ethical Standards;

Counterfeit, Fraudulent and Suspect Items ("CFSI") Policy to be introduced;

We propose to introduce employee satisfaction surveys on an annual basis to learn how we can make the workplace even better for our staff;

We will concentrate on promoting wellbeing across the business with the introduction of mental health first aiders and wellbeing champions to represent all sites and offices.

# **GRI INDEX**

# TABLE 1

This Report has been prepared "by reference" to relevant GRI Sustainability Reporting Standards. We have prepared this Report with due diligence and transparency. We welcome any comments or inquiries regarding the information presented. Table 1 below shows which disclosure indicators and material aspects we cover in this Report and where to find them.

Disclosure Number	Description	Page	Comments
GRI 102	2: General disclosures		
Organisati	onal profile		
102-1	Name of the organization	Cover	
102-2	Activities, brands, products, and services	4-5	
102-3	Location of headquarters	IFC	
102-4	Location of operations	5	
102-5	Ownership and legal form	4	
102-6	Markets served	4-5	
102-7	Scale of the organization	4	
102-8	Information on employees and other workers	16	
102-9	Supply chain	40	
102-10	Significant changes to the organization and its supply chain	40	
102-11	Precautionary Principle or approach	12	
102-12	External initiatives	39	
102-13	Membership of associations	39	
Strategy			
102-14	Statement from senior decision-maker	3	
Ethics and	integrity		
102-16	Values, principles, standards, and norms of behaviour	3	
Governanc	ce control of the con		
102-18	Governance structure	34-35	

Disclosure Number	Description		Page	Comments		
Stakeholde	Stakeholder engagement					
102-40	List of stakeholder groups		7			
102-41	Collective bargaining agreements			No agreements are in place within Augean.		
102-42	Identifying and selecting stakeholders		7			
102-43	Approach to stakeholder engagement		7			
102-44	Key topics and concerns raised		7			
Reporting	practices					
102-45	Entities included in the consolidated finan	icial statements	4-5			
102-46	Defining report content and topic Bounda	ries	7			
102-47	List of material topics		8			
102-48	Restatements of information		8			
102-49	Changes in reporting		8			
102-50	Reporting period		6			
102-51	Date of most recent report		6			
102-52	Reporting cycle		6			
102-53	Contact point for questions regarding the	report	6			
102-54	Claims of reporting in accordance with the	e GRI Standards	IFC			
102-55	GRI content index		44-47			
102-56	External assurance		8			

# **GRI 103: Management Approach**

Identified material aspects and boundaries			
103-1	Explanation of the material topic and its Boundary	8	
103-2	The management approach and its components	33	

Disclosure Number	Description	Page	Comments
GRI 200	0: Economic		
Economic	Performance		
201-1	Direct economic value generated and distributed	34	
Market Pre	sence		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		100%
Procureme	ent Practices		
204-1	Proportion of spending on local suppliers	40 (partial)	
GRI 30	0: Environmental		
Energy			
302-1	Energy consumption within the organization	20	
302-3	Energy intensity		To commence reporting in 2022.
Biodiversit	ty		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	22	
304-2	Significant impacts of activities, products, and services on biodiversity	22	
304-3	Habitats protected or restored	23	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		Data not provided because alternative data is disclosed that is more relevant to our business / sector.
Emissions			
305-1	Direct (Scope 1) GHG emissions	16, 20	
305-2	Energy indirect (Scope 2) GHG emissions	20	
305-4	GHG emissions intensity	17	
305-7	Nitrogen oxides ( $\mathrm{NO_{x}}$ ), sulfur oxides ( $\mathrm{SO_{x}}$ ), and other significant air emissions	16	

Disclosure Number	Description	Page	Comments
Effluents a	and Waste		
306-2	Waste by type and disposal method	17	
306-3	Significant spills	19	
Environm	ental Compliance		
307-1	Non-compliance with environmental laws and regulations	14	
GRI 40	0: Social		
Employm	ent		
401-1	New employee hires and employee turnover	26 (partial)	
401-3	Parental leave		To commence reporting in 2022.
Occupation	onal Health and Safety		
403-1	Workers representation in formal joint management–worker health and safety committees	27	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	28-29	
403-3	Workers with high incidence or high risk of diseases related to their occupation		During the past ten years there have been no fatalities or reportable Occupational Diseases identified.
403-4	Health and safety topics covered in formal agreements		No formal agreements covering health and safety are in place with trade unions
Training a	nd Education		
404-1	Average hours of training per year per employee	(partial)	Data not provided because alternative data is disclosed that is more relevant to our business / sector.
404-3	Percentage of employees receiving regular performance and career development reviews		To commence reporting in 2022.
Diversity a	and Equal Opportunity		
405-1	Diversity of governance bodies and employees	26	
405-2	Ratio of basic salary and remuneration of women to men	25	
Local Con	nmunities		
413-1	Operations with local community engagement, impact	32	

assessments, and development programs

# **GLOSSARY**

ANSS	Augean North Sea Services Ltd	IOSH	Institution of Occupational
BAT	Best Available Technique		Safety and Health
воео	Best Overall Environmental	ISO (9001; 14001)	International Standards
	Outcome		Organisation
BSI	British Standards Institute	LCF	Landfill Community Fund
CFSI	Counterfeit, Fraudulent and	LFT	Landfill Tax
	Suspect Items	LLW	Low Level Radioactive Waste
CIPD	Chartered Institute of Personnel	LTI	Lost Time Incident
	and Development	MSW	Municipal Solid Waste
CIWM	Chartered Institution of Wastes	NEBOSH	National Examination Board in
	Management		Occupational Safety and Health
CSR	Corporate Social Responsibility	NDA	Nuclear Decommissioning
CQA	Construction Quality Assurance		Authority
DEFRA	Department for Environment,	NORM	Naturally Occurring Radioactive
	Food and Rural Affairs	NPS	Materials National Policy Statement for
EA	Environment Agency		hazardous waste
EfW	Energy from Waste	OHSAS (18001)	Occupational Health and Safety
EIA	Environmental Impact		Accreditation Scheme
	Assessment	RIDDOR	Reporting of Injuries, Diseases
ENRMF	East Northants Resource		and Dangerous
	Management Facility		Occurrences Regulations
EPR	Environmental Permitting	SCCOP	Supply Chain Code of Practice
	Regulations	SEPA	Scottish Environment Protection
ESA	Environmental Services		Agency
	Association	SECR	Streamlined Energy and
ESG	Environmental, Social and		Carbon Reporting
5000	CorporateGovernance	SGS	Société Générale de
ESOS	Energy Savings Opportunity		Surveillance
	Scheme	SDG	Sustainable Development
GA	Green Alliance		Goals
GPG	Gender Pay Gap	SSSI	Site of Special Scientific
GHG	Greenhouse Gas		Interest
GRI	Global Reporting Initiative	UK	United Kingdom
HRMC	HM Revenue & Customs	WAC	Waste Acceptance Criteria
IMS	Integrated Management System		