

"Welcome to our sustainability report for our financial year October 2021 to September 2022. The Aarsleff UK Group completed another record year in turnover and pile production, furthering our mission to deliver excellence in ground engineering.

2022 is the year we really put our focus to sustainability. Carrying out our baseline year assessment and delivering training across our workforce, we've focused in on the first steps needed to embed sustainable thinking into our organisation.

2022 also brought with it the acquisition of our newest member of the Aarsleff UK Group, Cannon Piling. Cannon are based in Chelmsford, Essex and were officially incorporated into Aarsleff holdings on 1st April 2022. A primarily CFA and augured piling contractor, they strengthen our offerings in both discipline and regional markets. They have been included in this report from the point of acquisition.

Sustainability is a theme for the entire Aarsleff group and we are proud of the focus we are giving it in the UK. It has been embedded into our short-, mid- and long-term milestone plans as a business, as well as our main challenges, goals, and targets. Our core values of Life and Health, Trust, and Responsibility map excellently against a move towards sustainable development, helping every member of our team embed it into their daily work. We know this is the only way forward. We must adapt, using the constructive and progressive mindset we have always led with, and we hope to move forward to mitigate our negative impact and further the value we create for all our stakeholders.

This report maps our efforts during the year, reporting against goals we set within our baseline year report. We have also mapped against the 17 UN Global Sustainable Development Goals as we support their ambition to create common direction for the world we all wish to see by 2030. As many of our goals were developed during the financial year 21-22, progress mapped out within this report is marginal but important none the less. We hope that by next year, we can begin to demonstrate tangible steps forward."



- Kevin Hague, Managing Director (Aarsleff UK Group)



Business Context

The Aarsleff UK Group refers to all holdings of the Aarsleff Group based in the UK. Established in 1947, Per Aarsleff A/S is a leading Danish contractor composing of five segments - Construction, Pipe Technologies, Rail, Technical Solutions, and Ground Engineering. Overall, the Group devise, plan and deliver a variety of projects across the infrastructure, residential, rail, commercial and energy construction markets. We are three of over 50 companies who operate under the Aarsleff banner and are led by the Danish principles of transparency, trust, and responsibility.

Incorporated in the UK in 1991, Aarsleff Ground Engineering Limited is a leading UK ground engineering contractor, specialising in delivering multi-discipline excellence. We consistently design, plan, and safely deliver driven piling, bored piling, retaining wall, and geotechnical solutions, as well as offering plant fabrication, manufacture, and hire out of our Newark-based plant workshop.

Centrum Pile Limited is the UK's leading and most advanced manufacturer of continuously reinforced, precast concrete piles - using the most advanced concrete, distribution, mould, pile joint and manufacturing technology available. Since its conception in the UK in 1993, Centrum Pile's production facility has been continually developed to enable the manufacture of its high quality, reinforced precast concrete pile system.

Cannon Piling Limited is a Chelmsford-based augured piling contractor. Incorporated in 2002, Cannon designs and delivers CFA, rotary bored, and mini piling projects primarily in and around the South East of England. Focused in on quality and customer satisfaction, we work to deliver bespoke designs which add value to our client's projects.

The Aarsleff UK Group operates under the core values of Life & Health, Trust, and Responsibility, all of which feed into our 'Step into the Blue' culture. We developed this strategy because we think core values shouldn't just be a marketing technique, they're the lifeblood of our business and guide every decision we make, every single day. These values empower our employees, encouraging them to look after each other, giving them the knowledge they need to grow and find new ways to go about our work.

Group Mission

The Aarsleff Group plans and completes large, complex projects within infrastructure, climate adaptation, the environment, energy and building construction. We lay the foundations of a sound financial development of society and create value for the Group's shareholders.

Group Vision

The Aarsleff Group wants to be a leading and recognised project-oriented building and construction contractor in Northern Europe with market-leading positions in related specialist and highly efficient business areas. We want to be known for efficient, agile and secure management of diverse contractor projects. We want to be a preferred partner because we create value through cross-disciplinary synergies in all phases.







AARSLEFF GROUP THEMES

Sustainability

We want to contribute to the green transition of the construction business and to ensure that our Group has a common approach that brings benefits to our customers, employees and society

Profitability

We ensure profitability through a focus on strong project execution, efficiency and productivity with digitalisation as an important supporting element.

Job Satisfaction

We want to offer our employees an attractive workplace where a healthy and safe working environment, trust and team spirit are top priorities

Customer focus

We want to secure high customer satisfaction based on strong skills, focus on collaboration and high-quality supplies.

One Company

We work together actively to strengthen the Group's One Company collaboration in order to improve the competitiveness within solution of complex projects with a high degree of in -house production.

Skills Development

We want a strong, professional and operations-driven culture for our employees through lifelong learning and a high level of expertise within project management, methods, tools, product development and collaboration.



Report Context

The data within this report is collated from October 1st 2021 to September 31st 2022 in line with our financial year structure.

This report has been created in line with the Global Reporting Index Standards ² and the index for these standards has been provided at the end of this report. The general reporting standards have been covered with some additional information to inform our clients who may be required to report the construction specific standards as well.

We have not reported to GRI as this report will feed into our parent company, Per Aarsleff A/S.

Figures are reported based on data from our IT systems, invoices, meter readings, continuous registrations etc. Data are subject to standard control procedures for quality assurance of data. Any estimates included in the statements are specified.

Unless otherwise stated, data figures of this report solely include the companies Aarsleff Ground Engineering Limited, Centrum Pile Limited, and Cannon Piling Limited. As Cannon Piling was acquired partway through the reporting period, the data pertaining to them covers the period of April 1st to September 31st 2022 only.

The operating facilities included in this report are as follows:

- Aarsleff Ground Engineering offices (Hawton Lane, Newark) OWNED
- Centrum Pile Factory (Hawton Lane, Newark) OWNED
- Aarsleff Ground Engineering Doncaster Yard LEASED
- Aarsleff Ground Engineering Newcastle Office LEASED
- Aarsleff Ground Engineering Knaresborough Office LEASED
- Aarsleff Ground Engineering Plant Workshop (Newark) LEASED
- Cannon Piling Limited Office and Yard (Chelmsford) LEASED







Governance

The Aarsleff UK Group report into Per Aarsleff A/S. As we are a subsidiary, the UK directors report to the Group directors and board. UK Directors are required to sign an Annual Declaration of Conflicts of Interest.

Aarsleff use a combination of market determined salary that is supplemented by performance related criteria. Aarsleff does not operate a standard process for the provision of sign-on bonuses or recruitment incentive payments, termination payments or clawbacks. Pension contributions are determined in accordance with company guidance as a standard percentage of salary.

Aarsleff UK determines its remuneration policy in accordance with Group guidelines. At this stage, there is no remuneration committee due to the size of the operations. For our annual total compensation ratio, please see our annual accounts³.

Sustainability work within the wider European group is done through the Aarsleff ECO Center who plan to work with management boards and sustainability leaders across the group to develop policy but final sign off comes from the board. This process is in development as the ECO Center first tackle Denmark before disseminating across the group.

We do not operate a UK specific whistle blower policy, instead all UK employees have access to the wider European whistle blower portal on the group's main website.

Aarsleff is at the start of its sustainability drive. The highest governing body within the UK are aware of sustainability as it pertains to the industry and have shown an interest by attending conferences and talks by industry leaders. Senior management have all undertaken training to first introduce the concept as it relates to business and their roles.

A number of different facets make up the way we govern sustainability within our organisations. Responsibility sits at the highest level, with senior management, who we refer to as the 'Board'. They will determine and adjust our targets year on year, based on current and relevant information. They assess and manage risk and opportunity for the business as a whole and within the area of sustainability.

Below them sits the Management Board, made up of our other members of senior leadership. This board work to ensure cohesion across the business and further the business plan in each segment of the organisation.



We are aware, however, that sustainability is a practice that must be embedded at every level of an organisation and therefore, we encourage thought leadership within every area of the business. A central sustainability coordinator manages and assists in the delivery of our strategy but we encourage all employees to engage and develop their understanding of the risks and opportunities around the subject.

Stakeholder Engagement

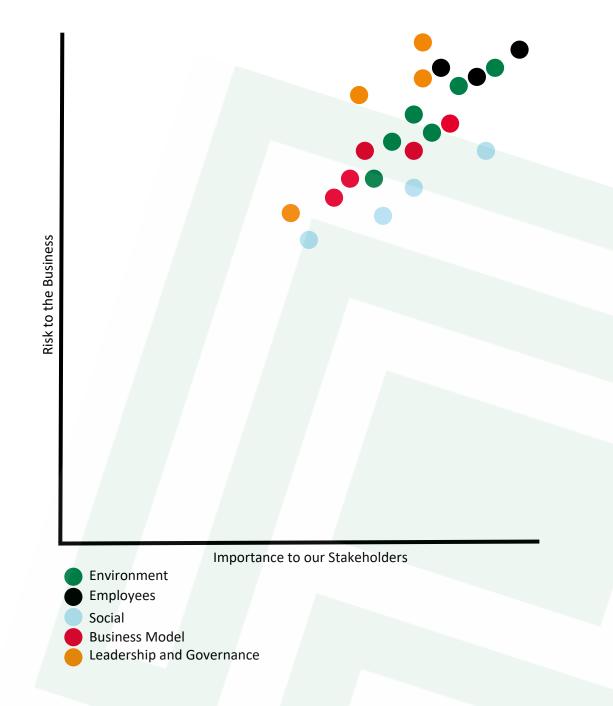
For the second year, we reached out to our stakeholders to understand which topics within sustainability are most important to them and how they rank subsections within these topics.

Our staff, clients, suppliers, and local stakeholders within the areas in which we operate were asked to rank 22 subtopics under 5 different topic headings in order to determine which materialities they hold most important. From there, we have completed a similar exercise with the UK Group's Management Board, asking them to rank the same 22 topics in relation to the risk it has on the company's ability to operate.

Of the topic headings, our findings demonstrated that 'Employees' held the most importance to both our stakeholders and the Board, closely following by 'Environment' and 'Leadership and Governance', with 'Business Model' and 'Social' following on.

Of the subtopics, the following seven were highlighted as being critical to both our stakeholders and our business resilience:

- Employee Health & Safety
- **Greenhouse Gas Emission Reduction**
- Employee Engagement, Diversity, and Inclusion
- **Business Ethics**
- **Energy Management**
- **Labour Practices**
- Risk Management



AarWorld - Targets on Climate Impact





of car fleet hybrid or electric

Target: 100% of cars hybrid or electric by 2025



Solar panels to be installed 22-23

Target: Improved energy usage within Centrum factory



In place to be implemented 22-23

Target: 100% of bought energy to be from renewables



Centrum EPD to be completed 22-23

Target: Offer CO2e data on piling tenders by October 2024



reduction in timber waste from 20/21 baseline

Target: Reduce timber waste 50% by October 2023



Separate strategy developing, implement 22-23

Target: 40% reduction in all waste by 2030



In place to be implemented 22-23

Target: Enhanced supplier policy for key suppliers



In place to be implemented 22-23

Target: Measure and report on value-engineering by 2023

Scope 1	Aarsleff	Centrum	Cannon (from April 22)	Total (tCO2e)
Petrol	7.66	172.45		180.11
Diesel	468.17	52.9	188.29	709.36
Office Heating (gas)			0.74	0.74
Total (tCO2e)	475.83	225.35	189.03	890.21
Scope 2	Aarsleff	Centrum	Cannon	Total (tCO2e)
Electricity (tCO2e)	21.36	234.63	10.25	266.24

Scope 3	Aarsleff	Centrum	Cannon (from April 22)	Total (tCO2e)
Raw Material (Steel)	3,310.51	8,829.82	1,374.66	13,514.99
Raw Material (Cement/Concrete)	3,116.01	11,200.65	2,940.04	17,256.7
Under packs	540.43	987.12		1,527.55
Equipment Hire	217.13	8.73	20.36	246.22
Other Raw Materials (Fly Ash etc)	23.68	321.86	0.05	345.59
Upstream Transport	5,555.91	155.46	405.15	6,116.52
Employee Commute	73.66	73.66	73.66	221
Timber	48.6	11.56		60.16
Lubricants	40.39	82.16	10.25	132.8
Insurance	58.33	58.33	58.33	175
Other	425.35	333.72	7.18	766.25
Total (tCO2e)	13,410	22,063.07	4,889.68	40,362.75

	Aarsleff	Centrum	Cannon (from April 22)	Total (tCO2e)
Scope 1 (tCO2e)	475.83	225.35	189.03	890.21
Scope 2 (tCO2e)	21.36	234.63	10.25	266.24
Scope 3 (tCO2e)	13,410	22,063.07	4,889.68	40,362.75
Total (tCO2e)	13,907.19	22,523.05	5,088.96	41,519.2



Total 20-21: 37,405 tCO2e



Total 21-22: 41,519.29 tCO2e



Carbon Intensity (tCO2e/turnover)

20-21: 806 tCO2e/£1 million turnover



Carbon Intensity (tCO2e/turnover)

21-22: 561 tCO2e/1 million turnover

LOCOWAG - Casting and Driving Cement-Free Concrete Piles

On Tuesday 7th June 2022, Aarsleff Ground Engineering carried out the world's first trial driving of cement free ultra low carbon precast piles manufactured using Cemfree concrete, as part of the LOCOWAG working group4.

Cast and cured at Centrum Pile's Newark headquarters, the piles were driven in non-working positions at a working Aarsleff site. The ongoing project on the site used to trial already established a tight drive for the standard precast piles, so it was clear prior to the trial driving that the Cemfree piles would be under onerous installation conditions pushed further by the selection of a Junttan with a 5T accelerated hammer for the trial works.

The trials were productive and progressive, allowing assessment of previous stages of the development project. The results demonstrated correlations between trial mix designation and performance, as well as confirming assumptions regarding the bespoke batching process utilised.

Speaking on the advancements in the project, Director of Centrum Pile, Darren Senior, said; "The process of developing a Cemfree concrete mix designation to match the specific requirements of a precast pile in terms of early age strength gain, ultimate strength and the ability to be handled and driven under significant forces has not been an easy task. The LOCOWAG project and the DB Group team have worked tirelessly over the past 18 months to present various mix designs and trial results which have ultimately led to the mix selected for the trial. The information obtained during the casting process and trial driving will allow the fine tuning of the specific precast Cemfree mix design and ultimately subject to the development of the design codes and standards a market ready product. This will allow projects to benefit from enhanced environmental and sustainability metrics."

The casting experience and trials undertaken have allowed further feedback to the working group who are continuously developing the chemical activator and bespoke mix designs for various implementations and markets including insitu piles and pre cast driven piles.

The full project wrapped at the end of 2022 and we are looking forward to ways in which we can carry the research forward, to create a less emissions-intensive product.



AarPeople - Targets on Employee Satisfaction





In place to be implemented 22-23

Target: 100% of senior management delivered unconscious bias training



Separate strategy developing, implement 22-23

Target: Further embed equality, diversity, & inclusion



In place to be implemented 22-23

Target: 100% of workforce received sustainability training



In place to be implemented 23-24

Target: 100% of workforce received health and wellbeing training

Aarlmpact - Targets on Societal Impact



of workforce enrolled on accredited training schemes as of Sept 2022

Target: 7% of workforce enrolled on accredited training schemes by 2025



In place to be implemented 2023

Target: Offer employees 2 paid volunteering days a year



In place to be implemented 22-23

Target: Deliver 3 skills/learning workshops within the community each quarter by 2025



Activities and Workers

Total number of employees by employment contract by gender



Data compiled through payroll system.

Assumptions made: Assumption that gender held within the system is correct. Part time is considered anything less than full time hours for specific roles.

Aarsleff and Centrum Pile also contracted three freelancers across the reporting period. Cannon Piling contracted 41 subcontractors.

The Aarsleff UK Group do not split employees/departments by region of the UK in which they work, as many of our employees work across the UK regularly.

We do not currently hold data on our employees' race, ethnicity, religion, or sexual orientation past carrying out Right to Work checks at onboarding.

Our policy commitments and how we embed these through our culture can be found on our website at: Policies - Aarsleff Ground Engineering ⁵

Our membership associations can also be found on our website at: Health and Safety - Aarsleff Ground Engineering ⁶

Our quarterly Worksafe Committee meetings in both Aarsleff and Centrum continue to be effective for representatives from across the business meet with our health and safety department to formally raise any concerns or ideas. The minutes from these meetings are distributed across the entire company and any comments or further ideas are fed back into STEQ department. We are expanding our use of the MyCompliance management system for all health and safety matters, helping to ensure that everyone is aware of any risks or incidents which have occurred, as well as formally exemplifying best practice.

Our internal communications, including our Monthly Roundup of company data and quarterly newsletter, aim to give insights of both the company's position and top down visibility, as well as updates from the more office based areas such as IT and HR.

Within the next year, we'll fulfil our strategy commitment to train all our employees on sustainability matters and set up sustainability collaboration meetings with thought leaders from all areas of the business, which we hope will work in much the same way as the Worksafe Committee meetings do. All employees in Aarsleff and Centrum are also undertaking a series of training modules each month in the financial year 22-23. These are:

- Equality Diversity & inclusion
- Modern slavery
- GDPR UK: Essentials
- Cyber security awareness
- Effective remote working (office personnel) / Noise (non-office personnel)
- Unconscious bias (Employees/managers)
- Bullying harassment (Employees/managers)
- Social media awareness & Fire Extinguisher Use
- Anti-bribery
- Stress awareness

We aim to include Cannon Piling in all of these processes and communications by the end of 2023.

Performance Management Based on Core Values

HR took a focus on performance management in 2022, following a noticeable decrease in retention from 2020 to 2021. A performance management strategy was created to address the concerns found in the retention study around employee/manager relationship and to encourage development discussions, to further employee potential and to ultimately improve staff retention.

The strategy focused on the company's core values; Life & Health, Trust, and Responsibility, to ensure the process was behaviour, rather than competency, focused. The process has three possible overall outcomes; Developing, Accomplishing and Excelling.

The decision to focus the scoring on company core values was made to help further embed the values into the workforce. It was decided the performance management process should focus on the culture the company desired and that it should help explain to employees what the values would mean to them and to help motivate improved behaviour across the workforce.

A Behaviour framework was created to show employees clearly the behaviours expected by the company and gave examples of how employees could evidence their effort to live by the company's core values in their day-to-day work. Employees were expected to use the Behaviour framework to evaluate their own behaviour in the Personal review element of the Performance review process. The managers would also do this for the employee.

The performance management process ends with a goal setting activity where employees and managers work together to create 1-3 goals for the employee to work towards. There is also an emphasis on development and career planning which forms part of the Goal setting template.

A report was shared to the whole workforce to show the performance review outcomes and negative feedback was limited. No employees appealed any performance review outcomes. Feedback showed that employees received a greater understanding of the core values and what they could do to show their alignment to them in the daily work.



Inspiring New Generations - Aarsleff and Apprenticeships

Apprenticeships form a key part of how Aarsleff engage with young talent and how we bring young people into the business.

With 740,400 people undertaking an apprenticeship in England in 2021/22⁷, they are a growing path into the workforce and Aarsleff recognises the need to support this young talent.

We currently have 5 apprentices working across our three companies, in a range of different roles. These include marketing, HR, plant, factory maintenance, and piling attendants.

Here's what some of them had to say about their experience of Aarsleff as an apprentice:

"Working at Aarsleff as an apprentice has allowed me to gain valuable knowledge and skills in regards to my role. I have been able to sit in various meetings and attend other HR courses to help me become aware of the different situations that can occur throughout the business. This is very practical as I was completely new to HR when I joined."

"My colleagues at Aarsleff are always there to help with any questions I have and are full of ideas on how to help me achieve my goals. My apprenticeship has helped me see how marketing plays a vital role in all businesses and I am proud to be a part of helping Aarsleff achieve its goals."

"Joining Centrum was nerve racking at first, but now I've got to know the team and with their help I feel I'm learning new skills everyday. Within the maintenance team, we can be doing anything from responding to urgent breakdowns, to carrying out PPMs and controlling stock. Everyday can be different which I enjoy, and learning how to put the skills I've learnt to practical use is enjoyable."

"My apprenticeship at Aarsleff taught me the value of each employee in the business. I learnt that no matter how small the task in hand may seem, working cohesively, we are all working towards a common goal. Aarsleff supported my apprenticeship, allowing me time to complete my studies, my colleagues were always there to help when/if required."



The UN's Sustainable Development Goals

At Aarsleff, the 17 UN global goals give us an opportunity to discuss internally and externally how we can contribute to comply with the Paris agreement and create a more responsible and sustainable world. The global goals create a framework for dialogue on how we affect and get affected by the issues encompassed by sustainability.

Within the Aarsleff Group, we focus on our impact through our own projects and in collaboration with clients, customers, partners and suppliers.

Our parent company analysed the 17 global goals, focusing on the Aarsleff Group's expected impact and, on that basis, assigned a score to each of the goals. Based on the analysis, ten goals are of particular interest, and four of them have an extraordinarily high score. The group gives priority to these goals because they are closely connected to our business model and strategy, and because we assess that Aarsleff has the best opportunity of affecting these specific goals in a relevant and effective way.

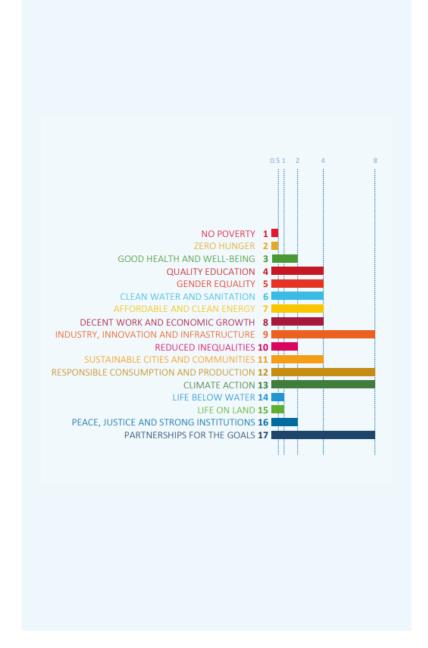
The four most important global goals are:

SDG 9 Industry, innovation and infrastructure

SDG 12 Responsible consumption and production

SDG 13 Climate action

SDG 17 Partnerships for the goals





The Aarsleff UK Group plays an important role within the construction industry, delivering foundation solutions for a wide range of sectors across the UK.

To play this part, we must strive to deliver the highest quality and the most competent solutions. We do this by having a continued focus on quality through our quality policy and working to achieve ISO standards year on year. We also focus on future-proofing our solutions and pay deep attention to opportunities for value-engineering; in our planning and design of projects as well as in our use of materials and resources on site.



In the fulfilment of this goal, it is important that Aarsleff focuses on delivering solutions of high quality; solutions that are sustainable and futureproof.

In addition, our environmental procedures ensure that we take the environment, climate and fuel efficiency into consideration when we purchase, operate and maintain our machinery and that we pay attention to correct handling of waste. Where possible, we integrate circular economy by contributing to more reuse and recycling of materials and resources.

We focus on avoiding material wastage and errors, on separating waste correctly, and on reducing the risk of environmental accidents.



We find it important to find solutions to the challenges that climate change pose to society as well as citizens and companies.

In several areas, Aarsleff works on finding solutions to reduce greenhouse gas emissions – in our own companies as well as in the total value chain. Our current calculations of CO2 emission provide us with a good basis for making reductions together with all our stakeholders.

We are looking to develop targeted policies and initiatives to improve energy-efficiency and reduce emissions within our machines, vans, and cars, and we have set reduction targets for our CO2 emissions in 2030 with current follow-up and evaluation each year.



Partnerships have a central role in sustainable development. Aarsleff participates in a number of partnerships with companies in the building industry, and in many cases we liaise with the research world, authorities, organisations and associations to find innovative solutions to the challenges within the areas of ESG.

Within the financial year 21-22, Centrum Pile wrapped up its work on the LOCOWAG project, which aimed to utilise cement-free concrete in piling solutions. We collaborated with DB Group, BRE, and Murphy Group to develop solutions using the concrete and achieved promising results in the precast piling trials cast by Centrum and driven by Aarsleff. We look forward to the ways we'll be able to carry the project forward.

We are taking regular discussions with ESG professionals across our supply chain, sharing knowledge and best practice to achieve collective goals. We also provide support where necessary to aid our supply chain in sustainable development.

The above examples show how partnerships play an important part in our planning and execution of projects with a strong focus on sustainability.



Aarsleff also affects a number of the other 17 global goals. Six other goals should be mentioned:

We affect SDG 4 (Quality education) through our commitment to upskilling our staff, our outreach programmes within local schools and the community, as well as our goals to take on more apprentices and graduates.

We affect SDG 5 (Gender equality) through new initiatives to increase the proportion of women in the Group and by taking steps to embed quality, diversity, and inclusion into our company culture.

We affect SDG 6 (Clean water and sanitation) by conscious efforts to reduce environmental accidents which may release to water in the areas within which we work.

We affect SDG 7 (Affordable and clean energy) through our work in providing foundations for renewable energy centres, as well as our efforts to convert our own energy usage to more clean sources.

We affect SDG 8 (Decent work and economic growth) by creating as secure and safe a workplace as possible, in terms of both physical and mental health. At the same time, we believe that responsibility and economic growth go hand in hand. This is reflected in our focus on diversity, inclusion and equal opportunities as well as in our view on human rights, corruption and data handling.

We affect SDG 11 (Sustainable cities and communities) by contributing expertise and participating in projects with focus on sustainable city planning, well-functioning and accessible public transport, and climate change adaptation projects.

References

- 1) Per Aarsleff A/S https://www.aarsleff.com/
- 2) GRI Standards https://www.globalreporting.org/standards/
- 3) Filed Accounts https://find-and-update.company-information.service.gov.uk/company/02623694/filing-history
- 4) LOCOWAG https://gtr.ukri.org/projects?ref=50436
- 5) Aarsleff Policies https://aarsleff.co.uk/about-aarsleff/policies/
- 6) Aarsleff Accreditations https://aarsleff.co.uk/about-aarsleff/health-and-safety/
- 7) Apprenticeships in the UK https://commonslibrary.parliament.uk/research-briefings/sn06113/
- 8) United Nations Sustainable Development Goals https://sdgs.un.org/goals

GRI Index

Disclosure	Reported (Y / N / N/A)	If yes, page of report	If no, why not?
Disclosure 2-1 Organisational Details	Yes	3	
Disclosure 2-2 Entities included in the organization's sustainability reporting	Yes	5	
Disclosure 2-3 Reporting period, frequency and contact point	Yes	5	
Disclosure 2-4 Restatements of information	n/a		
Disclosure 2-5 External assurance	Yes	5	
Disclosure 2-6 Activities, value chain and other business relationships	Yes	3	
Disclosure 2-7 Employees	Yes	15	
Disclosure 2-8 Workers who are not employees	Yes	15	
Disclosure 2-9 Governance structure and composition	Yes	6	
Disclosure 2-10 Nomination and selection of the highest governance body	Yes	6	
Disclosure 2-11 Chair of the highest governance body	Yes	6	
Disclosure 2-12 Role of the highest governance body in overseeing the management of impacts	Yes	6	
Disclosure 2-13 Delegation of responsibility for managing impacts	Yes	6	
Disclosure 2-14 Role of the highest governance body in sustainability reporting	No		Reported by Parent Company
Disclosure 2-15 Conflicts of interest	Yes	6	
Disclosure 2-16 Communication of critical concerns	Yes	6	
Disclosure 2-17 Collective knowledge of the highest governance body	Yes	6	
Disclosure 2-18 Evaluation of the performance of the highest governance body	Yes	6	
Disclosure 2-19 Remuneration policies	Yes	6	
Disclosure 2-20 Process to determine remuneration	Yes	6	
Disclosure 2-21 Annual total compensation ratio	Yes	6	
Disclosure 2-22 Statement on sustainable development strategy	Yes	2	
Disclosure 2-23 Policy commitments	Yes	15	
Disclosure 2-24 Embedding policy commitments	Yes	15	
Disclosure 2-25 Processes to remediate negative impacts	Yes	8-17	
Disclosure 2-26 Mechanisms for seeking advice and raising concerns	Yes	6	
Disclosure 2-27 Compliance with laws and regulations	n/a		
Disclosure 2-28 Membership associations	Yes	15	
Disclosure 2-29 Approach to stakeholder engagement	Yes	7	
Disclosure 2-30 Collective bargaining agreements	n/a		



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