

GRI Content Index

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission		
			Part Omitted	Reason	Explanation
GRI 101: Foundation 2016					
General Disclosures					
	Organizational profile				
	102-1 Name of the organization	Annual Report 2021, title page			
	102-2 Activities, brands, products, and services	Annual Report 2021, pages 4 - 5			
	102-3 Location of headquarters	Coronation Road, Cressex, High Wycombe, Buckinghamshire, HP12 3TZ.			
	102-4 Location of operations	Annual Report 2021, page 5			
	102-5 Ownership and legal form	Biffa is listed on the London Stock Exchange and a member of the FTSE 250.			
	102-6 Markets served	Annual Report 2021, page 5, 22 -27			
	102-7 Scale of the organization	Annual Report 2021, page 5, 67 and 184-186			
	102-8 Information on employees and other workers	Sustainability Report, page 78 - 79 Our workforce is based solely in the UK. At our recycling facilities the provision of labour for our picking and sorting operations are delivered through managed service contracts who provide c.1000 workers. The data collated on employees includes Simply Waste Services and Company Shop Group (CSG) employees.			
	102-9 Supply chain	Sustainability Report 2021, page 7			
	102-10 Significant changes to the organization and its supply chain	Annual Report 2021, page 24 (CSG acquisition)			
	102-11 Precautionary Principle or approach	Biffa operates in an industry where environmental and health risks are well understood and there are clear rules for responsible management. The area of our operations where the precautionary principle is most relevant is climate change and building a circular economy. Biffa has ambitious targets in place to increase UK infrastructure for plastics recycling and therefore enabling a more circular economy and is committed to achieving a 50% reduction in CO2 emissions by 2030 and to have net zero emissions in its operations by not later than 2050.			

GRI 102: General Disclosures 2016	102-12 External initiatives	<p>Company law requires the Directors to prepare Financial Statements for each financial year. Under that law, the Directors are required to prepare the Group Financial Statements in accordance with International Financial Reporting Standards (IFRSs) as adopted by the European Union and Article 4 of the International Accounting Standards Regulation and have elected to prepare the Company Financial Statement in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law), including FRS 101 'Reduced Disclosure Framework'.</p> <p>Our GHG emissions have been collated in accordance with the GHG Protocol and energy data is collated in accordance with the Streamlined Energy and Carbon Reporting scheme.</p> <p>Alignment with UN Sustainable Development Goals is demonstrated in the Sustainability Report, page 26 - 31</p>				
	102-13 Membership of associations	Sustainability Report 2021, page 24 Annual Report 2020, page 74				
	Strategy					
	102-14 Statement from senior decision-maker	Sustainability Report 2021, page 3				
	Ethics and integrity					
	102-16 Values, principles, standards, and norms of behavior	Annual Report 2021, page 4				
	Governance					
	102-18 Governance structure	Annual Report 2021, page 80 - 88				
	Stakeholder engagement					
	102-40 List of stakeholder groups	Annual Report 2021, pages 9 - 11 Sustainability Report 2021, page 15-17				
	102-41 Collective bargaining agreements	Sustainability Report 2021 Performance Data, page 78				
	102-42 Identifying and selecting stakeholders	Sustainability Report 2021, page 16				
	102-43 Approach to stakeholder engagement	Annual Report 2021, page 8 Sustainability Report 2021, page 16				
	102-44 Key topics and concerns raised	Sustainability Report 2021, page 16				
	Reporting practice					
	102-45 Entities included in the consolidated financial statements	Annual Report 2021, page 184 - 185				
	102-46 Defining report content and topic Boundaries	Sustainability Report 2021, page 16				
	102-47 List of material topics	Sustainability Report 2021, page 16				
	102-48 Restatements of information	Any data restated in the period is shown on the relevant page and an explanation provided.				
	102-49 Changes in reporting	Sustainability Report 2021, page 14, 76				
	102-50 Reporting period	Sustainability Report 2021, page 76				
	102-51 Date of most recent report	Sustainability Report 2021, page 76				
	102-52 Reporting cycle	Sustainability Report 2021, page 76				
	102-53 Contact point for questions regarding the report	Sustainability Report 2021, page 76				
	102-54 Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI standards core option.				
	102-56 External assurance	Sustainability Report 2021, page 77				
GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission			
			Part Omitted	Reason	Explanation	
Material Topics						
200 series (Economic topics)						
Economic Performance						
	103-1 Explanation of the material topic and its Boundary	Our economic performance is linked to the following material topics addressed in our				

GRI 103: Management Approach 2016	103-2 The management approach and its components	Sustainability Report 2021. Recycling - page 34 Plastics recycling - page 35 Energy from waste - page 39 Boundary: Internal, All Biffa entities	
	103-3 Evaluation of the management approach		
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Annual Report 2021, pages, 13, 32 - 35, 138 - 194 Sustainability Report 2021, page 74 - 75	
	201-2 Financial implications and other risks and opportunities due to climate change	Annual Report 2021, page 22- 27, 56 - 62	
	201-4 Financial assistance received from government	Annual Report 2021, page 146-147	
Indirect Economic Impacts			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our indirect economic impacts are included within the following material topics addressed in our Sustainability Report 2021. Recycling - page 34	
	103-2 The management approach and its components	Plastics recycling - page 35 Biodegradable packaging - page 36 Food waste - page 38	
	103-3 Evaluation of the management approach	Energy from waste - page 39 Consumer behaviour - page 40 Sustainable investment - page 50 Carbon pricing - page 52 Community engagement - page 72 Partnerships - page 74 Biodiversity - page 75 Boundary: Internal. all Biffa entities; External, local communities, UK circular economy	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Our commercial investments and services are detailed in our Annual Report 2021, page 21 - 27 Further details can be found in our Sustainability Report 2021 on pages: Recycling - page 34 Plastics recycling - page 35 Food waste - page 38 Energy from waste - page 39 Sustainable investment - page 50	
	203-2 Significant indirect economic impacts	Significant indirect economic impacts are shown in our Sustainability Report 2021 on pages: Recycling - page 34 Plastics recycling - page 35 Food waste - page 38 Energy from waste - page 39 Consumer behaviour - page 40 Sustainable investment - page 50 Biodegradable packaging - page 36 Community engagement - page 72 Partnerships - page 74 Biodiversity - page 75	
Anti-corruption			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Report, 2021, page 70 - 71 Annual Report 2021, page 67, 69 Boundary: Internal, All Biffa entities and third parties with whom we do business.	
	103-2 The management approach and its components		
	103-3 Evaluation of the management approach		

	205-1 Operations assessed for risks related to corruption	<p>Sustainability Report, 2021, page 70 - 71 Annual Report 2021, page 67, 69 - 71</p> <p>Sadly, the waste sector is vulnerable to infiltration by criminals who perpetrate Modern Slavery. The provision of labour through managed service contracts and recruitment agencies remain an area of risk. This type of arrangement is mainly found at our Material Recycling Facilities and Plastics Recycling Facilities within the Resources and Energy (R&E) division (7 sites) and Industrial and Commercial (I&C) division (13 sites). As such we maintain regular contact with our managed service providers through onsite Account Managers and hold regular meetings to discuss actions in regard to preventing modern slavery in their business, including an annual strategic review with their CEO.</p>	
	205-2 Communication and training about anti-corruption policies and procedures	<p>Sustainability Report, 2021, page 70 - 71 Annual Report 2021, page 67, 69- 71</p> <p>We demand transparency and integrity in all of our business dealings, to avoid any improper advantage, or the appearance of questionable conduct by our employees or third parties with whom we do business.</p> <p>Compliance modules completion rates:</p> <ul style="list-style-type: none"> • Anti-Fraud and Corruption 92% (all Exec, L grades, M grades and S grade line managers) • Modern Slavery 88% (all users with a Biffa email address) • Unconscious Bias 95% (all Exec, L grades, M grades and S grade line managers) • Equality and Diversity 88% (all Exec, L grades, M grades and S grade line managers) 	
300 series (Environmental topics)			
Energy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Energy is covered within: Renewable energy, Sustainability Report 2021 - page 50	
	103-2 The management approach and its components	We have outlined a number of targets within our sustainability strategy that drive action. The Board Sustainability Committee are accountable for these targets.	
	103-3 Evaluation of the management approach	Sustainability Report 2021, page 12.	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	<p>Annual Report 2021, page 63 Sustainability Report 2021 Performance Data, page 78 - 79</p> <p>We collate our GHG emissions and energy consumption data following the GHG Protocol and SECR regulations. The DEFRA emission factors (2020) are used to determine the conversion rates, link below. Energy consumption is reported for facilities within our operational control.</p> <p>Cooling and steam consumption are not applicable to our business and therefore not reported. Heating, cooling and steam sold are not applicable to our business and therefore not reported.</p>	
		https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020	
Biodiversity			
	103-1 Explanation of the material topic and its Boundary	Sustainability Report, 2021, page 75	
	103-2 The management approach and its components		

GRI 103: Management Approach 2016	103-3 Evaluation of the management approach	Once our landfill sites are full and stop taking waste, they are capped and restored in accordance with the Planning Permission and Environmental Permit requirements, typically for after-uses such as agriculture, nature conservation, woodland, public amenity or a combination of these. Boundary: Internal, All Biffa entities; External, local communities	
	304-3 Habitats protected or restored	Sustainability Report 2021, page 75 Sustainability Report 2021 Performance Data, page 78 - 79 At present, 31% or c.1,400 acres of our landfill estate is managed for biodiversity. This has been calculated by carrying out habitat surveys which were then mapped onto site plans. We used a habitat classification with certain habitat types classified as 'biodiverse'. The area considered 'biodiverse' was divided by the total landfill portfolio size to give the overall percentage. These areas are spread geographically around the UK and comprise of woodland, wildflower and scrub habitat and areas designated to certain species such as newts. At a number of our sites partnerships exist with third parties in order to protect habitats. The Moors Project, Redhill is a designated Site of Nature Conservation Importance (SNCI) and the southern area is owned by Biffa with the area being leased to the Surrey Wildlife Trust as a nature reserve. The project has enhanced wetland habitat and flood plain grazing marsh habitat.	
Emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	Emissions are covered within: Greenhouse Gas Emissions from operations - 47 Greenhouse Gas Emissions from landfill - 48 Greenhouse Gas Emissions from value chain - page 49 Carbon pricing - page 52 Our Scope 1 and 2 emissions boundary aligns with our financial/operational control in accordance with the GHG Protocol. Our scope 3 emissions take into consideration the value chain of our operations.	We do not currently collate emissions from ODS, NOX and SOX. Therefore we have excluded 305-6 and 305-7. We continue to review these areas and will look to report against them in the future.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions 305-3 Other indirect (Scope 3) GHG emissions	Sustainability Report 2021 Performance Data, page 78 -79 We collate our GHG emissions following the GHG Protocol and use the DEFRA emission factors (2020) for conversion rates Emissions are reported for facilities within our operational control. https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020 Sustainability Report 2021 Performance Data, page 78 - 79 We collate our GHG emissions following the GHG Protocol and use the DEFRA emission factors (2020) for conversion rates Emissions are reported for facilities within our operational control. https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020 Sustainability Report 2021 Performance Data, page 78 - 79 We collate our GHG emissions following the GHG Protocol and use the DEFRA emission factors (2020) for conversion rates Scope 3 categories included are; purchased goods and services, capital goods, fuel and energy related activities not included in Scope 1 and 2 emissions, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, downstream leased assets and investments. Emissions associated with Biffa's upstream leased assets are accounted for under Scope 1 and 2. Due to the nature of the business and service we provide, downstream transportation and distribution, processing of sold products, use of sold products, end-of-life treatment of sold products and franchises are not relevant.	

		https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020	
	305-4 GHG emissions intensity	Sustainability Report 2021 Performance Data, page 78 - 79	
	305-5 Reduction of GHG emissions	Annual Report 2021, page 63	
Environmental Compliance			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Biffa has a team of experienced and qualified environmental support experts working across all operating divisions. We have an environmental compliance strategy in place including annually reviewed targets and actions at local, divisional and Group levels. Biffa's team of environmental regulation and policy specialists also engage with the UK Government, regulators and policy makers to help shape the national regulatory and policy framework in relation to environmental matters.	
	103-2 The management approach and its components		
	103-3 Evaluation of the management approach	Boundary: Internal, All Biffa entities	
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	Compliance Assessment Reports received from the Environment Agency are shown in Sustainability Report 2021 Performance Data, page 78 -79 We recorded no cases of fines or non-monetary sanctions in the reporting period.	
400 series (Social topics)			
Employment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Report, 2021, page 64 - 66	
	103-2 The management approach and its components	Boundary: Internal, All Biffa entities	
	103-3 Evaluation of the management approach		
	401-1 New employee hires and employee turnover	The attrition rate is calculated as Leavers divided by average monthly headcount across the year. The attrition rate for the period ending 31st March 2021 was 23.8%	We do not currently report the number of new employees or number of leavers and instead use the attrition rate which is calculated as leavers divided by the average monthly headcount across the year. In future years we will look to report this by gender and age group.
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	At Biffa we offer a wide and competitive range of benefits to our employees. Provision is to all employees or differentiated on the basis of job role and/or job level where this is the market norm. For benefit eligibility we do not distinguish between full and part time employees. A Biffa grading system and job evaluation framework has been developed with Korn Ferry, who are the market leaders in job evaluation, grading and remuneration matters. It helps to benchmark pay and benefits externally using job size based comparisons. Examples of employee benefits can see seen in: Sustainability Report, page 48 Annual Report 2021, page 9, 70, 77, 175	

<p>GRI 401: Employment 2016</p>	<p>401-3 Parental leave</p>	<p>Biffa has two standard maternity offerings. The first is "Statutory", where an employee does not meet the criteria for the second, "Company" offering.</p> <p>Biffa Employees are entitled to the "Company" maternity leave offering where they have over 1 year of service 15 weeks before the expected week of childbirth (EWC). The "Company" entitlement is 14 weeks at full pay then 25 weeks as standard rate Statutory Maternity Pay (SMP).</p> <p>For Paternity leave Biffa currently offer statutory leave and Statutory Paternity Pay (SPP). To be eligible the employee must have worked continuously for the Company for at least 26 weeks ending with the 15th week before the EWC.</p> <p>TUPE employees entitlement is as per their contract from their previous provider.</p> <p>During FY 20/21 the following numbers of employees took Parental leave which equates to 1% of total employees.</p> <ul style="list-style-type: none"> •56 people in receipt of SMP •43 people in receipt of SPP •41 people in receipt of Parental Pay •2 people in receipt of ShPP 	
<p>Occupational Health and Safety</p>			
<p>GRI 103: Management Approach 2016</p>	<p>103-1 Explanation of the material topic and its Boundary</p> <p>103-2 The management approach and its components</p> <p>103-3 Evaluation of the management approach</p>	<p>Sustainability Report, 2021, page 63 - 64 Annual Report 2021, page 69</p> <p>Occupational Health, Safety and Wellbeing policy Boundary: Internal, All Biffa entities- including contractors carrying out works at Biffa facilities.</p> <p>https://www.biffa.co.uk/-/media/files/sustainability/policies/occupational-health-safety-and-wellbeing-policy-2019-20.ashx</p>	
	<p>403-1 Occupational health and safety management system</p>	<p>Biffa will provide health surveillance to protect the health of its employees and comply with all legal requirements to provide a safe workplace.</p> <p>Biffa has over 9000 employees and Individuals who regularly carry out safety critical work are subject to additional surveillance requirements in accordance with DVLA requirements, HSE guidance and risk assessment.</p> <p>Approximately 75% or 6000 of our employees are involved in activities which expose them directly to risk and all are assessed at a frequency dictated by job risk resulting in individual screening varying from one to three years for the employees in this group.</p> <p>Safety critical work surveillance includes a general questionnaire & screening for specific medical conditions that would be a risk for the nature of the work such as epilepsy, diabetes and cardiac problems.</p> <p>Biffa will take appropriate action if health surveillance detects early signs of work-related ill-health. Examples include noisy machinery causing hearing loss, paint solvents leading to asthma, hand-held tools provoking vibration white finger, dusty waste causing dermatitis or breathing difficulties and we undertake annual voluntary night worker assessment for employees who work permanently or rotate onto night work regularly.</p> <p>Biffa also offer a number of medical assessments to staff in order to ensure that our employees are as fit and healthy as they can possibly be as well as demonstrating our commitment to employee health and to comply with rules and regulations set out by law. In addition to the standard screening we offer non-compulsory free tests for blood pressure, pulse, height, weight, BMI, Musculoskeletal, urinalysis to test for the presence of blood, protein and sugar in addition the standard/mandatory vision, hearing, lung function and skin checks required by the HSE. Assessments are carried</p>	

GRI 403: Occupational Health and Safety 2018		<p>hearing, lung function and skin checks required by the HSE. Assessments are carried out by someone who has been appropriately trained.</p> <p>Based upon these assessments a surveillance matrix has been developed to form a baseline level of surveillance required for each category of employee. Site Managers inform our OH service if any additional site specific health hazards exist which may affect the health of the workers and agree any additional surveillance requirements with the OHP and SHEQ.</p> <p>An inoculation matrix has also been developed based on the risk from typical waste industry exposures such as sharps and needles, contact with sewage and clinical waste, animal bites etc.</p> <p>Biffa also place great importance on the general health and physical/mental wellbeing of our employees. We have deployed a group wellbeing strategy for the past 6 years which enables all of our people to access free counselling, financial or legal services, a free online wellbeing service and employee rewards scheme.</p> <p>Everyone who attends our sites is required to comply with our health and safety policies and procedures. Anyone attending a site to complete works or a project is required to undertake a site induction.</p> <p>Annual Report 2021, page 69 Occupational Health, Safety and Wellbeing policy, below.</p> <p>https://www.biffa.co.uk/-/media/files/sustainability/policies/occupational-health-safety-and-wellbeing-policy-2019-20.ashx</p>	
	403-2 Hazard identification, risk assessment, and incident investigation	<p>Annual Report 2021, page 69 Sustainability Report 2021, page 64 Occupational Health, Safety and Wellbeing policy https://www.biffa.co.uk/-/media/files/sustainability/policies/occupational-health-safety-and-wellbeing-policy-2019-20.ashx</p>	
	403-3 Occupational health services	<p>Sustainability Report 2021, page 64</p> <p>Safety critical work surveillance includes a general questionnaire & screening for specific medical conditions that would be a risk for the nature of the work such as epilepsy, diabetes and cardiac problems.</p> <p>Our ' & Me ' programme focuses on aspects of health and wellbeing that are particularly relevant to Biffa. The programme delivers campaigns, training and offers a dedicated website with advice and guidance on how to improve wellbeing. We also have our Smarter Ways of Working programme which supports flexible working and work-life balance and provide a confidential Employee Assistance Programme with a 24-hour helpline.</p>	
	403-4 Worker participation, consultation, and communication on occupational health and safety	<p>As above. Annual Report 2021, page 64-65, 76 Sustainability Report 2021, page 63</p>	
	403-5 Worker training on occupational health and safety	<p>Annual Report 2021, page 64-65, 76 Sustainability Report 2021, page 63</p>	
	403-6 Promotion of worker health	<p>Biffa place great importance on the general health and physical/mental wellbeing of our employees. We have deployed a group wellbeing strategy for the past 6 years which enables all of our people to access free counselling, financial or legal services, a free online wellbeing service and employee rewards scheme.</p>	

	<p>403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p>	<p>Biffa offer a number of medical assessments to staff in order to ensure that our employees are as fit and healthy as they can possibly be as well as demonstrating our commitment to employee health and to comply with rules and regulations set out by law. In addition to the standard screening we offer non-compulsory free tests for blood pressure, pulse, height, weight, BMI, Musculoskeletal, urinalysis to test for the presence of blood, protein and sugar in addition the standard/mandatory vision, hearing, lung function and skin checks required by the HSE.</p> <p>Based upon these assessments a surveillance matrix has been developed to form a baseline level of surveillance required for each category of employee. Site Managers inform our OH service if any additional site specific health hazards exist which may affect the health of the workers and agree any additional surveillance requirements with the OHP and SHEQ.</p> <p>An inoculation matrix has also been developed based on the risk from typical waste industry exposures such as sharps and needles, contact with sewage and clinical waste, animal bites etc.</p>	
	<p>403-8 Workers covered by an occupational health and safety management system</p>	<p>Biffa has over 9000 employees and Individuals who regularly carry out safety critical work are subject to additional surveillance requirements in accordance with DVLA requirements, HSE guidance and risk assessment.</p> <p>100% of employees are covered by our occupational health and safety management system.</p> <p>At a number of our recycling facilities the provision of labour for our picking and sorting operations are delivered through managed service contracts who provide circa 1000 workers. The Occupational Health arrangements for these workers are picked up on the pre-employment questionnaire and when our supplier of managed service contracts carries out occupational health screening.</p> <p>The Biffa SHQ team conduct internal audits of compliance to the Biffa Group Integrated Management System. External audits of compliance are carried out by NQA against ISO 45001.</p> <p>Everyone who attends our sites is required to comply with our health and safety policies and procedures. Anyone attending a site to complete works or a project is required to undertake a site induction.</p> <p>https://www.biffa.co.uk/-/media/files/sustainability/accreditation-pdfs/nqa-iso-45001.ashx</p>	

	403-9 Work-related injuries	<p>Sustainability Report 2021 Performance Data, page 78 - 79</p> <p>No. of all injuries - 592</p> <p>No. of LTIs - 74</p> <p>No. of LTIs more than 3 days but less than 8 (non-RIDDOR) - 12</p> <p>RIDDOR rate - 0.26</p> <p>No. of RIDDORs Over 7 day injury - 27</p> <p>No of. RIDDORs Major injury - 20</p> <p>No. of RIDDORs Fatality - 0</p> <p>No. of RIDDORs Dangerous occurrence - 0</p> <p>No. of RIDDORs Occupational disease - 0</p> <p>No. of RIDDORs Injuries to people not at work - 1</p> <p>There has been a rise in LTI's most notably caused by slips, trips and falls. Whilst this increase in LTI's is disappointing, meeting the challenges associated with providing a Covid Secure work environment has been our priority to ensure we keep our staff and customers Covid safe whilst continuing to deliver an essential service during the pandemic. In response to the rise in LTI's, the business has developed a suite of safety videos which target the common cause of our LTI's. Alongside this initiative, a bespoke Safer Together training course has been developed and being rolled out across our Supervisor community.</p> <p>The LTI rate refers to the number of lost time injuries per 100,000 hours during the 12 calendar months up to and including the review period. The number of lost time injuries in the past 12 months is multiplied by 100,000 to evaluate the number of injuries per 100,000 hours worked. The FTE used is an average of Biffa and agency staff over the past 12 months. A permanent Biffa employee is counted as 1 with agency employees varying depending on hours worked. The FTE is multiplied by 2,000 to evaluate this at a level that represents the typical hours worked in a year.</p>	
	403-10 Work-related ill health	<p>Biffa will provide health surveillance to protect the health of its employees and comply with all legal requirements to provide a safe workplace.</p> <p>Biffa will take appropriate action if health surveillance detects early signs of work-related ill-health. Examples include noisy machinery causing hearing loss, paint solvents leading to asthma, hand-held tools provoking vibration white finger, dusty waste causing dermatitis or breathing difficulties and we undertake annual voluntary night worker assessment for employees who work permanently or rotate onto night work regularly.</p>	We do not currently report the number of work-related ill health incidents as it is not possible for us to measure this accurately. We expect our health surveillance system to significantly reduce or eliminate the chances of work related ill health cases.
Training and Education			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Report 2021, page 70	
	103-2 The management approach and its components		
	103-3 Evaluation of the management approach	Boundary: Internal, all Biffa entities	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Sustainability Report 2021 Performance Data, page 78 - 79	Due to the impact of covid-19 there has been a focus on virtual training and e-learning. Therefore we have revised our metric for this area to 'training interventions per employee'. We do not report the average training by gender or employee category at present however we will look to include this in future reports.
	404-2 Programs for upgrading employee skills and transition assistance programs	<p>Sustainability Report 2021, page 70</p> <p>We continue to offer Apprenticeships where they offer the best learning experience for our colleagues. The use of Apprenticeships is part of a much broader portfolio of development opportunities that we offer. In addition to our range of learning programmes, we are a partner to the Government's Kickstart scheme and have committed to 65 placements for young people under the age of 25.</p>	
Diversity and Equal Opportunity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Report, 2021, page 68 - 69	
	103-2 The management approach and its components	Boundary: Internal, All Biffa entities	
	103-3 Evaluation of the management approach		
	405-1 Diversity of governance bodies and employees	Sustainability Report 2021 Performance Data, page 78 - 79	

GRI 405: Diversity and Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Gender Pay Gap Report 2020 https://www.biffa.co.uk/-/media/files/sustainability/csr/2020-gender-pay-gap-report.ashx	We do not currently report gender per age group.
	Forced or Compulsory Labor		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Annual Report 2021, page 66 Sustainability Report, 2021, page 67 Modern Slavery Statement Boundary: Internal, All Biffa entities; External, collaboration with the waste sector	
	103-2 The management approach and its components	https://www.biffa.co.uk/-/media/files/legal-docs/biffamodernslaverystatement_2020.ashx	
	103-3 Evaluation of the management approach		
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Sustainability Report 2021, page 67 Annual Report 2021, page 69 - 71 Sadly, the waste sector is vulnerable to infiltration by criminals who perpetrate Modern Slavery. The provision of labour through managed service contracts and recruitment agencies remain an area of risk. This type of arrangement is mainly found at our Material Recycling Facilities and Plastics Recycling Facilities within the R&E (7 sites) and I&C divisions (13 sites). As such we maintain regular contact with our managed service providers through onsite Account Managers and hold regular meetings to discuss actions in regard to preventing modern slavery in their business, including an annual strategic review with their CEO. Our facilities are all within the UK.	
Local Communities			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Local communities is linked to the following material topics addressed in our Sustainability Report 2021.	
	103-2 The management approach and its components	Community engagement - page 72 - 74 Partnerships - page 74 - 75 Boundary: Internal, all Biffa entities; External, local communities	
	103-3 Evaluation of the management approach		

GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	<p>Annual Report, pages 8 - 11 Sustainability Report 2021. Food waste - page 38 Community engagement - page 72 - 74 Partnerships - page 74 - 75</p> <p>We have 6 facilities which hold community liaison meetings. These provide an opportunity to keep residents and other interested groups informed and an opportunity to raise questions for discussion.</p> <p>We have a formal complaints procedure. All complaints are logged on our internal system and where appropriate reviews of local operations are undertaken. Any actions that are identified must be completed and closed out. Feedback is also given to the complainant. We have targets in place to reduce the number of complaints.</p> <p>For our larger facilities that have the potential for the biggest environmental impact we under take Environmental Impact Assessments and Hydrological Risk Assessments. An example of this is on our operational landfill sites where we undertake periodic Hydrological Risk Assessments and in the development of larger infrastrucutre such as Energy from Waste we undertake Environmental Impact Assessment and Air Quality Impact Assessments.</p>	
Customer Privacy			
GRI 103: Management Approach 2016	<p>103-1 Explanation of the material topic and its Boundary</p> <p>103-2 The management approach and its components</p> <p>103-3 Evaluation of the management approach</p>	<p>Sustainability Report, 2021, page 72 Annual Report 2021, page 76, 94, 101, 103 Boundary: Internal, All Biffa entities; External, customers and other third parties with whom we do business</p>	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	There were no substantiated complaints concerning breaches of customer privacy and losses of customer data during the reporting period.	
Other material areas not covered by GRI			
Leadership and governance		This topic was highlighted through our materiality assessment. It addressed through the GRI General Disclosures rather than the GRI Material Topics however we believe it is important that we provide our stakeholders with information on this topic. Our approach to this topic is covered in our Sustainability Report 2021, page 71.	
Transparency and sustainability reporting		This topic was highlighted through our materiality assessment. It does not correspond directly with the GRI Material Topics however we believe it is important to provide our stakeholders with information on this topic. Our approach to this topic is covered in our Sustainability Report 2021, page 72.	