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Title: <h1 style="text-align: center;">IMS</h1> <h2 style="text-align: center;">PRO/IT-CC-001</h2> <h1 style="text-align: center;">Compliance Control Reporting Policy</h1>			

It is the intention of Just Hire UK Limited (T/AS Network Waste) to provide its customers with real time quantifiable management information through its online management system Compliance Control. This policy sets out the information available on the system and the calculations used in order to provide the most realistic and accurate reporting that we have the ability to provide.

Real time reporting

Compliance Control is integrated with our operating and finance based systems to ensure service transactions processed one day are picked up on the overnight update and will be visible the following morning. Diverted percentages are updated following quarterly waste returns received from the Environment Agency.

Weight based reporting

The Compliance Control System uses a combination of methods to generate weight based information for reporting purposes.

Any service that is provided with a weight based price will be recorded based on the weighbridge ticket value received from the disposal location. Any non-weight based service will be recorded based on assumed Environment Agency Published figures. These figures are freely available in the documents section of the system. Subcontractors are encouraged to update assumed tonnage figures with actual figures where known, and these figures will take precedence when available.

Carbon Emission Reporting

The CO2e data in Compliance Control is based on calculations and factors provided by DEFRA, and were reviewed by ADAPT / University of East Anglia. The calculations are based on: -

- 🚫 The distance between the customer's site address and the subcontractor's nearest disposal location,
- 🚫 The weight of the waste being hauled,
- 🚫 Classifications of vehicle type / size, including vans, rigid and articulated vehicles of sizes between <3.5tn to >33tn.

Each container type in Compliance Control is assigned to the appropriate vehicle classification that is typically used to service that container. CO2e figures are not calculated for any transactions labelled under "Misc. Services", as they do not involve the transporting of waste. These can include documents, plant / tool hire, admin charges, labour etc.

The following assumptions are applied to the CO2e calculations: -

- 🚫 It is assumed that all vehicles are standard vehicles of that category, e.g. using diesel fuel and not bio-fuel,
- 🚫 Calculations are based on the route suggested by Google Maps. For the purpose of the calculations, distances are based on an A-to-B route and diversions / detours are not taken into account,
- 🚫 It is assumed that the specific containers are always transported using the same class of vehicle. Various sources were referenced to determine the typical vehicle classification used for each container / service,

- ❌ Some specialist services (such as hazardous / WEEE collections) can show unusually high mileage and potentially high CO2 figures. This is usually due to the lack of suitable facilities for that particular waste in the region of the customer's site. In most cases, such subcontractors will often visit on a specific day with the intention of collecting several clients' special waste from that region,
- ❌ While calculations are based on the vehicle's movements from the customer's site to the disposal location, in the case of direct tipping (where the start location may not be known), an alternative nearby start address may be used, typically the site's "main office" address. The actual site could possibly be nearer or further away than the reporting suggests.

Duty of Care

Compliance Control provides Duty of Care documentation on a real time basis. The following documents will be available in a PDF format for all transactions.

- ❌ Waste Carriers License
- ❌ Waste Management License
- ❌ Annual Waste Transfer Notes (permanently sited containers only).

In addition to the above; singular waste transfer notes are available via request through the system or by contacting a member of the Network Waste team. We will endeavour to provide the Waste Transfer Note within 48 hours of the request.

Insurance

The Network Waste team work hard to ensure that we minimise the risk to our customers when our supply chain are completing service requests on our behalf. Therefore, we ensure we hold a public liability insurance document for each of our suppliers and provide a copy along with the Duty of Care documentation on the Compliance Control System.

Diversion from Landfill Rates

The system calculates landfill diversion levels by using reporting gained from the Environment Agency and / or the supply chain. The reporting is displayed on the following basis:

- ❌ **Current Environment Agency Data** – We will utilise data received from the Environment Agency to provide our customers reported landfill diversion levels. The Environment Agency data is provided under license.
 - The Environment Agency reports are based on quarterly returns submitted to them by waste operators across the industry.
 - We use the data most recently released under our license agreement with the Environment Agency. However, this data is subject to change following the Quality Assurance program conducted annually by the Environment Agency.

- ❌ **Current Supplier Data** – In the event of the "Environment Agency" data being unavailable, we will use data provided by the supplier.

NOTE: In the rare event where both sets of data are available and are different, then we will use the Environment Agency figures unless the supplier has provided sufficient written evidence to the contrary.

- ❌ **Recent Data** - In the event of either set of "Current" data being unavailable, we will use the most "recent" landfill diversion data that we have received from either the Environment Agency or the supplier, to provide our customers reported landfill diversion levels.
- ❌ **Monthly Industry Average** - Failing having "recent" information available our system will default to a "monthly industry average" setting. This industry average is calculated from existing "Current Supplier" and "Environment Agency" figures from all other suppliers for a given month. This figure will only be used if 20 or more sets of figures exist for the month, in order to improve accuracy. This method merely provides a "guide" to how our customers waste maybe treated, if processed in line with typical industry practices.

- ❏ **Industry Average** – Failing having “Monthly Industry Average” figures, our system will default to an industry average figure. This is based on the information we have received from the above sources over a longer period of time. This provides a reflection of current processing achievements within the UK waste industry, but the figures will merely provide a “guide” to how our customers waste maybe treated, if processed in line with typical industry practices.
- ❏ We are always extremely cautious in our approach to any averages used to ensure the figures, where possible, represent an understated rather than overstated figure.

Compliance Control Disclaimer

Network Waste gather the information presented on Compliance Control from a number of data sources. Any information presented on Compliance Control is done so with the intention of providing accurate and robust reporting to our customers. However, the Environment Agency supply information to Network Waste, under license, which confirms that the data is subject to change based on their Quality Assurance processes. The reporting is also subject to human intervention at various stages and as such, it is possible that errors could occur. Therefore, Network Waste reserve the right to change, alter or amend the data on Compliance Control, in line with changes received from our range of data sources, or for any other reason.

Issue Number	Date issued	Author	Revision / change
1	June 2013		Initial version
2	October 2014		Included CO2e Reporting Policy and option for suppliers to specify actual weights to override assumed weights.
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