electricity north west

Bringing energy to your door

Sustainability

2013 | REPORT

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Introduction

Sustainability Report

Electricity North West defines sustainability as ensuring our business is successful in the inclusion of social and environmental considerations into our operations.

This means satisfying our customers' demands whilst also managing the expectations of other people such as employees, suppliers and the community around us.

It means contributing positively to the North West region and managing our environmental impacts.

What we want to achieve and how we're going to do this

We want to inspire the next generation of science students.

We want to provide opportunities and experience for the young people of the North West as they are the bill payers of tomorrow.

We want to raise the profile of our company and what we offer by closer ties to our local communities.

Report objectives

- To report our objectives and measure our results.
- To provide transparency of our sustainability strategies and programmes.
- To show future plans and targets.

Chief Executive Officer's review

The importance of delivering electricity to the five million people who rely on us should not be underestimated. We all depend on electricity at the flick of a switch – for work, for play and in some cases for life itself.

We deliver power to people and businesses through our huge network of underground cables and overhead lines.

Not only what we do, but how we do it, can have profound impacts on the communities we serve.

We take our social responsibilities seriously, and this new sustainability report incorporates all of our corporate social responsibility and stakeholder engagement activity over the past
12 months.

The thing I'm most proud of delivering over the past year is our renewed holistic approach, including governance arrangements and methodology for determining material issues.

We've built on our years of responsibility reporting and developed a renewed framework for engaging with our stakeholders to really understand what they think and allow us to act on it.

Combining these activities, we have created our sustainability framework. Identifying stakeholders, engaging with them on issues relevant to them, and responding to those issues with tangible outputs that help meet the objectives of all parties.

And, for the first time, we engaged Deloitte LLP to provide independent assurance on our reporting, and commitment to the AA1000 Account Ability Principles Standard (AA1000APS).

Sustainability is about planning for the long term. Recognising our impacts and continually improving. Sustainability is not a bolt-on to our business. It is at the core of what we do. It is the way we make decisions and find solutions.

I'm proud of the huge amount of work we've done to embed solid frameworks and principles throughout our organisation in the past 12 months, and I'm excited about how much further we can go.

As always I look forward to hearing your thoughts, and continuing working with you to improve the way we do business.

Steve Johnson | Chief Executive Officer
ELECTRICITY NORTH WEST

Overview

Industry overview

The electricity industry in Great Britain is divided into four main sectors:

- The generators, who own both the large power stations and smaller renewable generators. The generators produce electricity from a variety of fuel sources.
- The transmission companies, who own and operate the 400kV and 275kV transmission networks that link the major power stations to the distribution networks and transport electricity in bulk across the country. National Grid Electricity Transmission is responsible for the transmission network in England and Wales.
- The distribution companies, who own and operate the lower voltage electricity networks, connecting the smaller power stations and the national grid to every electricity customer in Britain. Originally there were fourteen regional Distribution Network Operators (DNOs), but these have been joined by a number of smaller Independent Distribution Network Operators (IDNOs). The fourteen DNOs are currently owned by six different companies.
- The electricity suppliers, who buy the electricity produced by the generators, sell that electricity to their customers and pay the network operators for the transportation of that electricity across their networks.

The electricity market is regulated by the Gas and Electricity Markets Authority which governs and acts through the Office of Gas and Electricity Markets (Ofgem). Distribution operators are directly regulated by Ofgem and their charges for use of their networks are subject to a price control mechanism.

Electricity North West is one of the fourteen regional DNOs and is a private limited company registered in England and Wales. We are owned by a consortium of funds controlled by the Commonwealth Bank of Australia and IIF International Holding GP Limited which is a constituent of JP Morgan Infrastructure Investments Fund.

Company overview

In simple terms our network is made up of overhead lines, underground cables and items of plant, such as switchgear and transformers, which are used to distribute electricity to customers' premises.

The bulk of electricity enters our network from the National Grid at Grid Supply Points. It then travels through our 132kV network to a substation where the voltage is transformed to enter our 33kV network. Similar transformations take place from 33kV to HV (High Voltage) and from HV to LV (Low Voltage).

Through this network we deliver almost 24 terawatt hours1 of electricity each year to around 2.4 million customer premises across an area of 12 500 square kilometres.

Our network covers a diverse range of terrain and customer mix from isolated farms in rural areas, to areas of heavy industry, urban populations and city centres.

As a rough guide, about 55% of our customers live in Greater Manchester, 30% in Lancashire and 10% in Cumbria, with the remainder in parts of Cheshire, Derbyshire and North Yorkshire.

The network performs such that on average a customer will experience a power cut less than once every two years and on average is without electricity for less than one hour every year. This represents a reliability of over 99.99%.

Our network comprises the following key assets:

- around 13 000 km of overhead lines;
- over 44 000 km of underground cables;
- over 84 000 items of switchgear; and
- more than 34 000 transformers

Strategy and objectives

Our company vision is 'to be the leading energy delivery business' measured against the following strategic objectives:

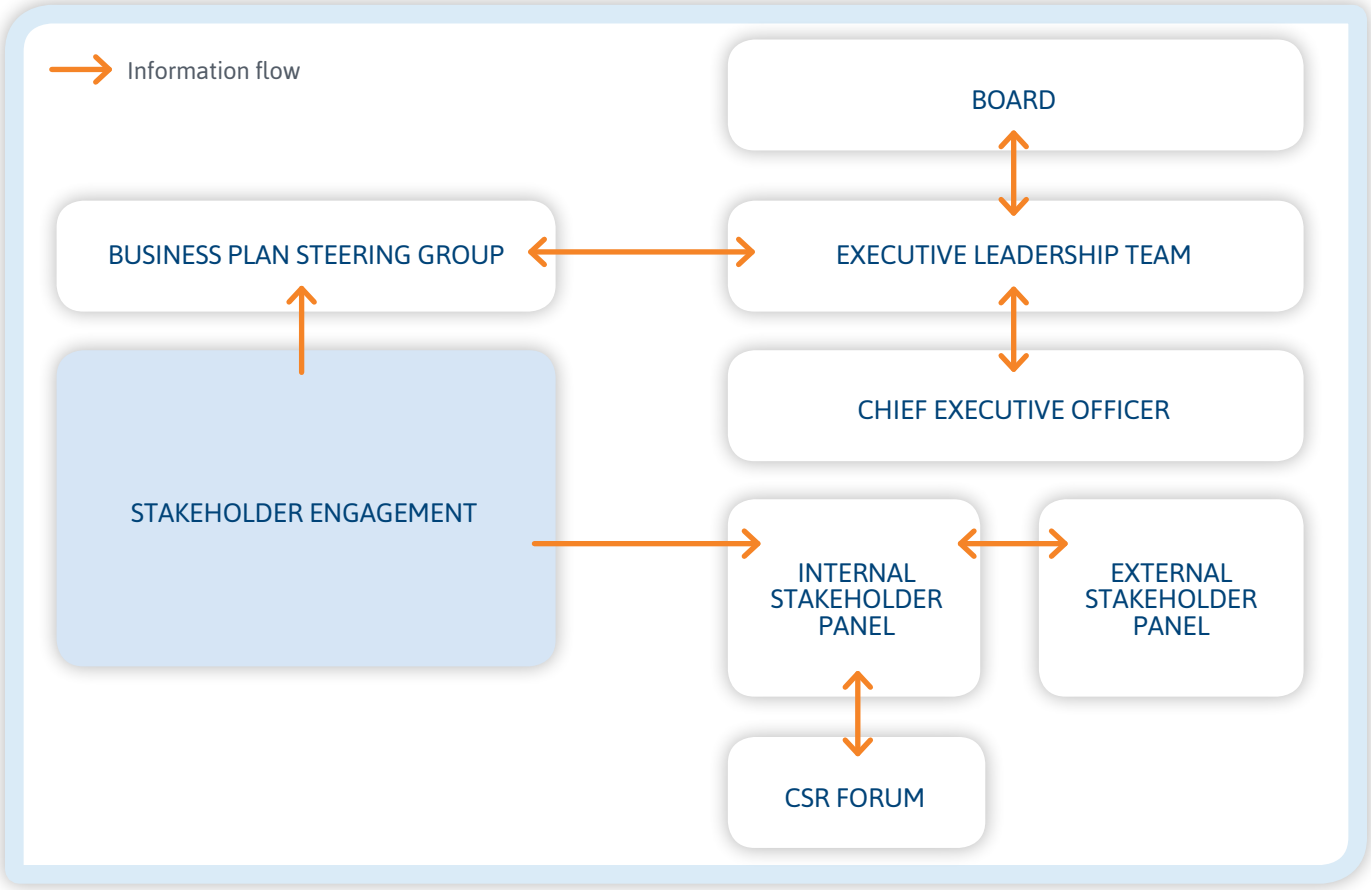
- understand and influence the market
- understand and deliver for our customers and stakeholders
- develop a high performance organisation
- deliver sustainable growth with robust financial performance

For a comprehensive business review, please see our annual report and consolidated financial statement 2013.

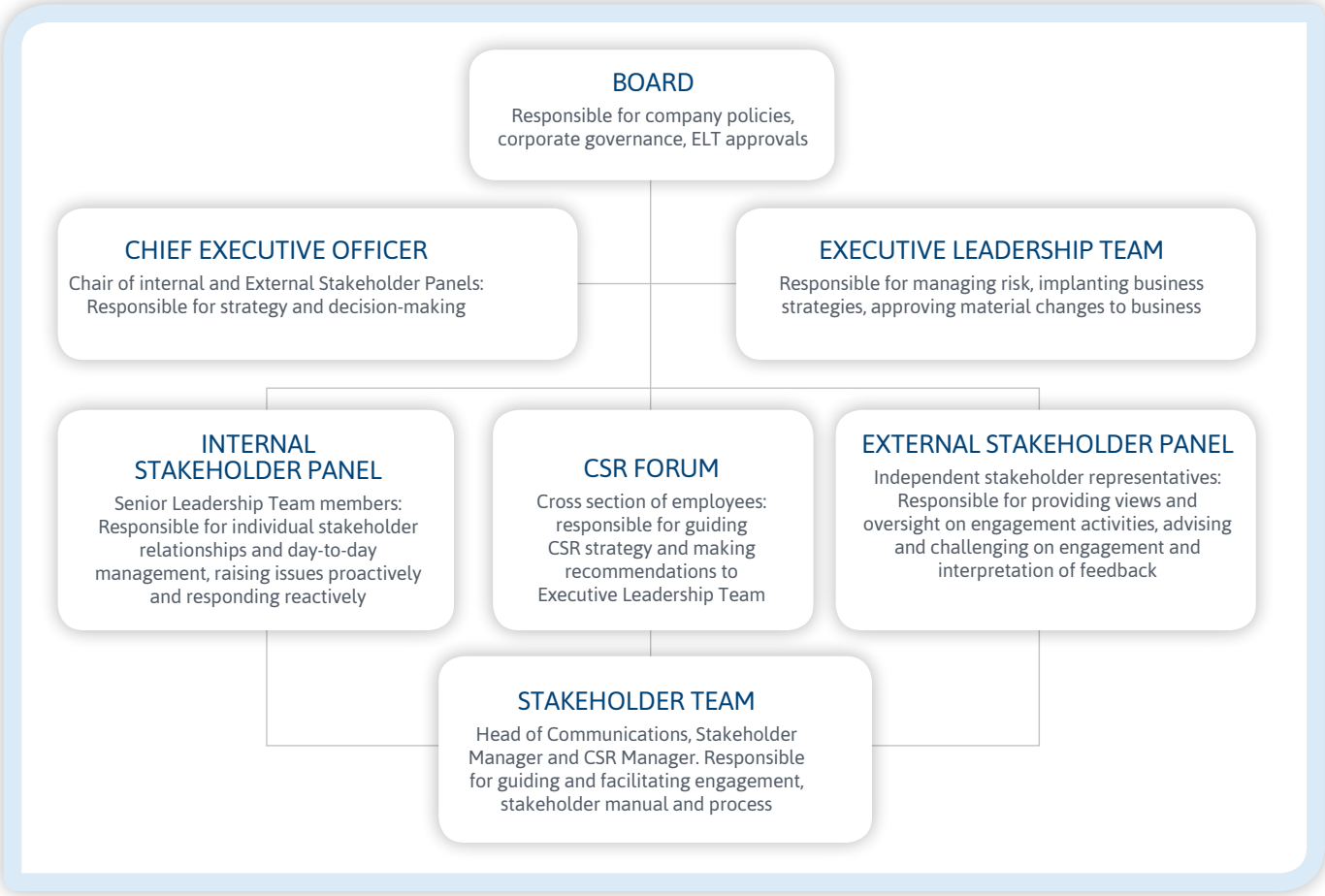
Business structure

Electricity North West regulated	Distribution network	Owns, operates and maintains the electricity network for the North West of England providing power to 5 million people.
	Connections	Provides connections to our network for new houses and small businesses, industries, wind farms and housing developers.
Non-regulated	Construction & Maintenance Services	Manages high voltage private networks for large customers,: for example airports and shopping centres. This business is operated through Electricity North West (Construction and Maintenance) Limited.

Governance structure



Responsibilities



Stakeholders Engagement

Stakeholder engagement

Our stakeholders include anyone or any organisation that can affect or is affected by our network or our actions.

Because of the service we provide, that's everyone in the North West – from domestic customers to large businesses – but it also includes environmental groups, local authorities and schools, as well as national stakeholders like our regulator Ofgem and the Department for Energy and Climate Change (DECC).

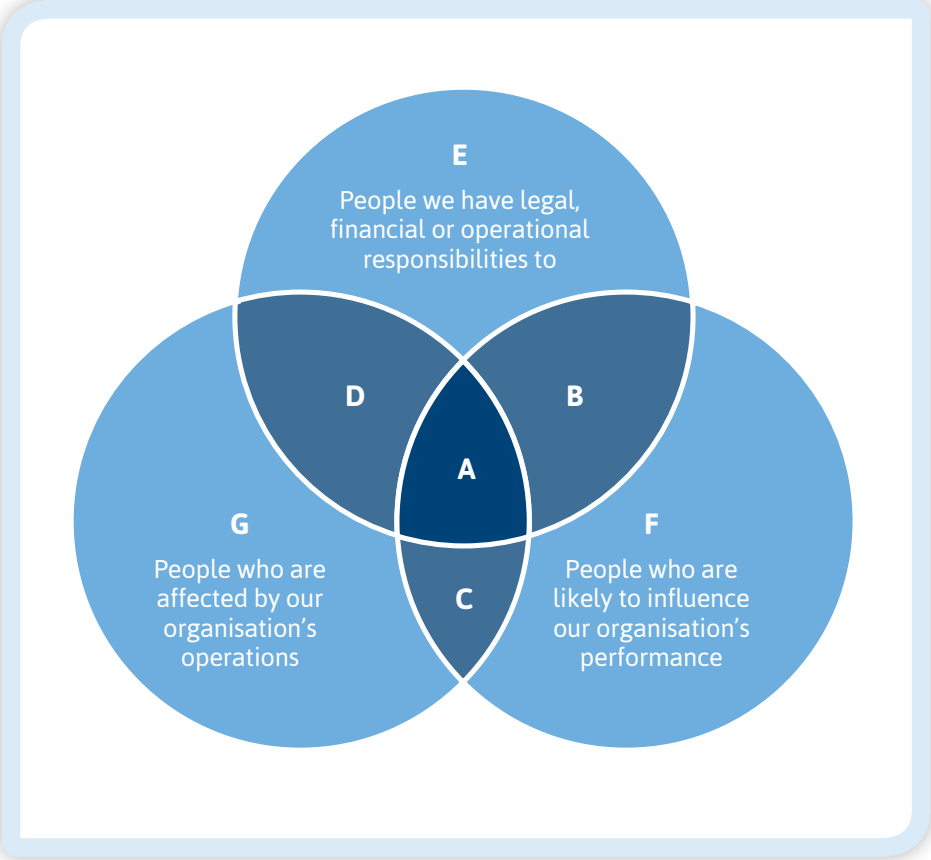
We're open with stakeholders about how we do business and how stakeholders can and do influence our decision making.

Our approach to stakeholder engagement is to:

1. Identify relevant stakeholders;
2. Identify the issues and priorities that are relevant and material to stakeholders, and engage with them appropriately; and
3. Respond to feedback and keep stakeholders updated on our actions

Identifying stakeholders

The first stage of our stakeholder engagement strategy is to identify our stakeholders. We have developed our process for stakeholder identification into an objective framework, allowing us to review our existing list of stakeholders and add or remove stakeholders based on set criteria, ensuring consistency and fairness in selection and prioritisation.



A set process for this element of our plan also removes the risk of the loudest stakeholder drowning out others.

Our stakeholders are many and varied, ranging from domestic customers to national government. Our approach is to ensure that we're engaging with the right stakeholders, in the right way, at the right time, on the right issues.

Stakeholder Group	Engagement Need	Engagement In 2012/13
Customers	Our customers include anyone who pays for our services, including domestic, business and connections and distributed generation customers. We need to listen to our customers' views to improve our business and the services we provide for them.	» Ongoing customer service phone interviews » Willingness to pay surveys » Online feedback forms and web survey
Public sector	From local government and schools to emergency services, MPs and national government we have a number of key relationships and a vast range of public sector stakeholders. Engagement locally is essential due to the unique nature of our business which directly affects local communities. Engagement nationally as a regulated business is also essential, ensuring that we communicate appropriately at all levels and recognise our role in the UK.	» Regional workshops » Emergency planning meetings » Two MP events, survey and 1-1 engagement » Ongoing engagement through CEO's chairmanship of Energy Networks Association (ENA) » School liaison through BrightSparks educational programme
Industry	Our industry engagement includes that with electricity suppliers, employees and contractors and other utilities. By working together we can gain the benefits of a range of experience and viewpoints to help us serve our customers more efficiently and effectively.	» Supplier meetings through ENA and our own 1-1s » Contractor forums » National Joint Utilities Group » Industry working groups

Stakeholder Group	Engagement Need	Engagement In 2012/13
Non-governmental organisations	We interact with a number of NGOs, including environmental and other lobby groups. We have a local and national perspective to our responsibilities. For example, environmentally, we must manage our own direct impact with local stakeholders, and nationally we must continue to facilitate the UK's move to a low-carbon future. Stakeholders include National Parks, National Energy Action, British Red Cross, Consumer Futures.	» Undergrounding for visual amenity quarterly group » External stakeholder panel » Regional workshops » Participating in stakeholders' meetings/workshops
Financial	Our financial stakeholders, including our investors, banks and credit rating agencies, clearly have a big impact on our organisation.	For more information see:www.enwl.co.uk/about-us/investor-relations Regular meetings with banks and credit rating agencies to keep them informed

Looking Forward

Key impacts and opportunities

We expect that in forty years time the physical structure of electricity networks will be largely recognisable as the structure that is in existence today, but there will be a number of significant changes as we move towards a more intelligent and sustainable network.

By the 2050s customers will have an increased reliance on electricity due to the UK's drive to de-carbonise heating, transport and electricity generation. Electricity will be generated on a large scale predominantly from nuclear and large wind farms, but there will also be significant low-carbon generation owned by customers, or sited close to them.

Customer expectations will have changed to reflect the improved standards they have experienced, and the technology available. Because of the move to de-carbonise heat and transport they will be more dependent on electricity, but we expect that they will have a greater tolerance of short duration outages because of the capabilities of smart appliances and local storage. Conversely, given this tolerance is based on storage, they could have lower tolerance of longer outages.

In order to match the supply of electricity to demand, customers will use smart appliances which respond to price and market signals to run at the optimum time for the customer and the network as a whole. Customers will generally use considerably more electricity for heating and transport, but smart technology will spread the load to meet the available generation.

Changes to our network

Distribution companies will have to change to cope with the significant data management issues, both in relation to customer behaviour and in relation to the accuracy of asset data for system operation when dynamically managing power flows in real time.

The network will need to become more responsive to customer needs, so more automation will be required, particularly for the remote control of network equipment and the remote scheduling of customers' generation and storage.

There will also be a requirement for new commercial relationships with National Grid, small generators, network operators, suppliers and with customers or their agents.

Drivers for changes on our network

There are many factors which will influence the development of our network into the 2050s. Currently there is significant uncertainty about the extent to which each of these factors will materialise.

The extent to which the factors become reality and the interplay between them will define how our future network will look.

We have identified the key components driving our network development as being:

- Changing customer expectations and needs;
- Stewardship of the existing network;
- Moves to a low carbon economy;
- Regional development and growth;
- Introduction of local renewable generation;
- Introduction of electric vehicles;
- Introduction of heat pumps;
- Adapting to the impacts of climate change; and
- New technology.

Many of these themes will be interlinked so our approach, policies and procedures will be modified to incorporate the new factors into our standard ways of working.

Whilst developing our future forecasts, we have worked at a national level as part of the Smart Grid Forum working with Ofgem, DECC and other network companies to develop national scenarios. The five workstreams established within the Smart Grid Forum have looked at:

- Scenarios for future demand on the network;
- Development of an evaluation framework;
- The network impacts of future demand scenarios;
- Identification of risks; and
- Future work plans.

The outputs from these work streams will be used in our future forecasts

Factors driving growth

As well as maintaining the current performance of our network we also have to plan for changes of use of our network. Whilst energy efficiency measures will act to reduce the amount of energy used, other pressures will act to increase electricity demand. These include:

- population growth and movement;
- economic growth and/or economic regeneration;
- increased use of air conditioning;
- electricity displacing gas as a source of heating; and
- future use of electric vehicles, displacing petrol and diesel.

The increase in population, plus the increased intensity of electrical use is expected to lead to a major increase in electricity demand. Government estimates suggest that electricity demand could double by 2050. We will have to develop our network to meet this expected growth through a mix of our business-as-usual practices and new approaches where non-traditional loads appear.

As well as managing new connections associated with increases in demand we also have to cater for the increased amount of local generation that will connect to our network.

Material Issues

Material issues

What we engage with stakeholders on is just as important as how we do it. We must make sure that our engagement it relevant and meaningful.

We have established our own priorities based on our overall business strategy, and worked with stakeholders to identify their priorities.

The matrix forms the basis of the issues on which we engage, and allows us to apply a uniform approach to determining proportionality.

Materiality matrix 2013

Inclusion of priorities in the matrix is influenced by three factors:

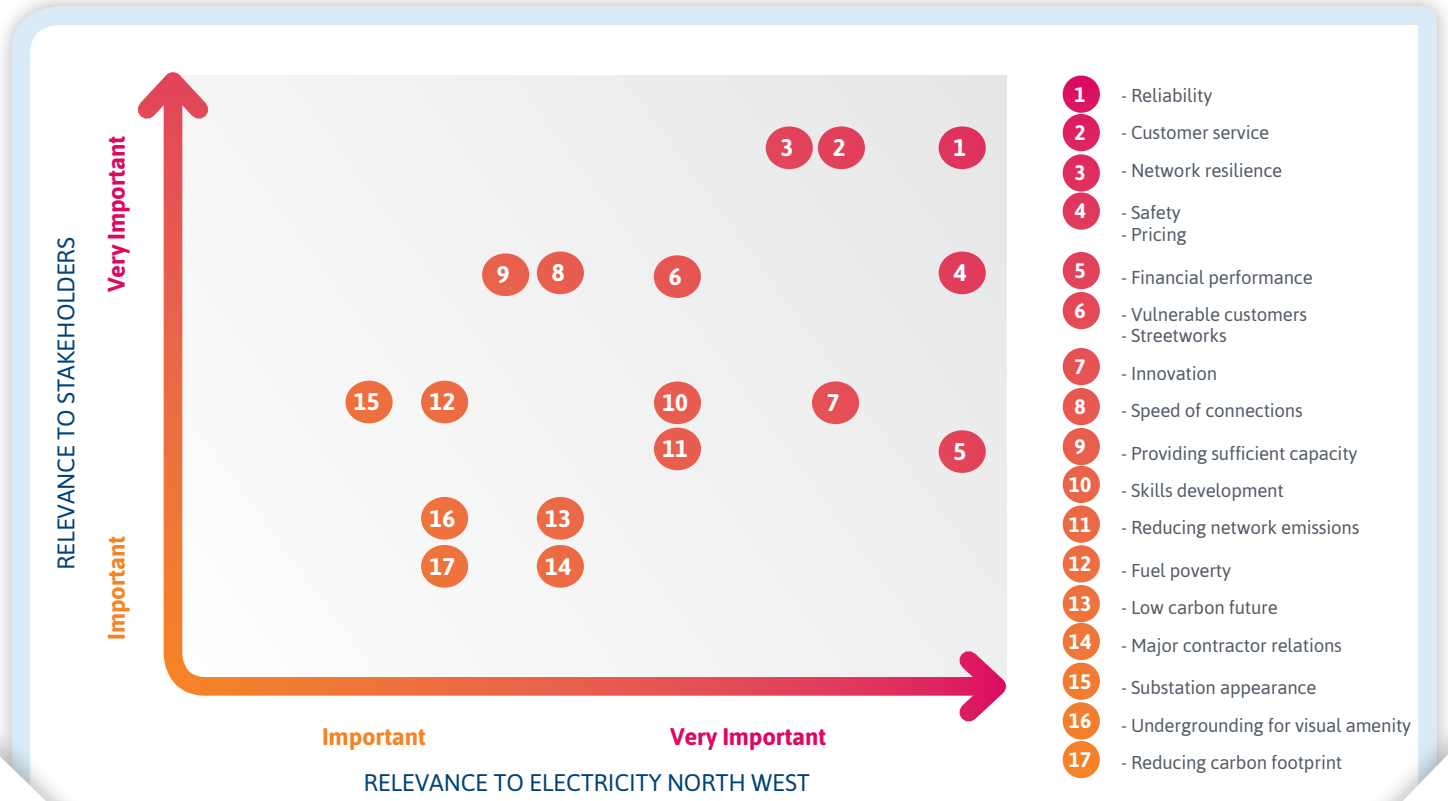
1. Feedback from stakeholders on what is important to them
2. Electricity North West's own five values: customer, people, safety, performance and innovation.
3. Ofgem's, key output areas for the next 10 years: reliability and availability, customer service, safety, environment, conditions for connections, and social obligations.

Using our corporate 'risk matrix' we have scored each priority against the risk of not including it, in financial, legal, regulatory, health, safety, environment, people, reputation and security of supply terms.

We then multiplied this against a 'likelihood' score indicating the likelihood of the issue to have a major effect on our business in the next 10 years.

By categorising stakeholders in relation to how they are affected by, or affect our operations – using the stakeholder identification Venn diagram – we have been able to attribute appropriate and proportional weightings to their views.

Using these weighted stakeholder opinions, and also incorporating a calculation to incorporate the number of stakeholders affected, we have plotted relevance to stakeholders.



Community

Community

Our challenge

Our business plays a critical role in the North West

Our community strategy has developed over the past 2 years after consultation with our stakeholders and companies such as Business in the Community. This consultation has allowed us to focus our strategy around 3 key areas where we can make a real difference: Education, Employability and Fuel Poverty.

Overview

Corporate giving	2011/2012 - £4,700 2012/2013 - £4,100
This decrease in Corporate Giving is attributed to the guidelines that were put in place for the donation request and approval process.	
Give as you earn (through the Charities Trust)	2011/2012 - £10,858.96 (131 employees involved) 2012/2013 - £10,485.83 (123 employees involved)
Volunteering time given	2011/2012 – 85 hours = £1,062.50** 2012/2013 – 382.5 hours = £4,781.25**
Bright Sparks sessions delivered	2011/2012 - 139 2012/2013 - 145

Volunteering hours based on a 7.5 hour day.
**Monetary value based on average hourly rate of business which for March 2013 was £12.50

Current schemes up and running

Education

- Key stage 2 – Bright Sparks
- Key Stage 3 – Tomorrow's Engineers
- STEM ambassador programme interventions
- Manchester Science Festival sponsorship
- Cumbria Big Bang Near Me sponsorship
- CREST award support in Cumbria
- UTV media

Employability

- Youth Action Young Enterprise scheme
- Ready to work sessions in conjunction with Business in the Community

Fuel Poverty

- Engaged with National Energy to review our educational programmes to include energy efficiency messages where appropriate

Case study

Our challenge

Safety is one of our 5 corporate values, and ensuring that this message is promoted to schools and young people in the north west is vitally important.

Business case

Promoting safety and informing young people of the dangers involved in electricity distribution is a key aim of our educational schemes. The more information we can give to young people, the less likely they are to injure themselves in or around equipment.

Action

We engaged with a UTV media in order to develop this scheme. The brief was then given to Warrington Collegiate and Bury College media departments, for them to put together a DVD that covered specific safety messages.

This was a great example of an integrated campaign that involved working with different providers (UTV media and Bright Sparks deliverers) and working with local colleges in order to provide a targeted and relatable safety DVD.

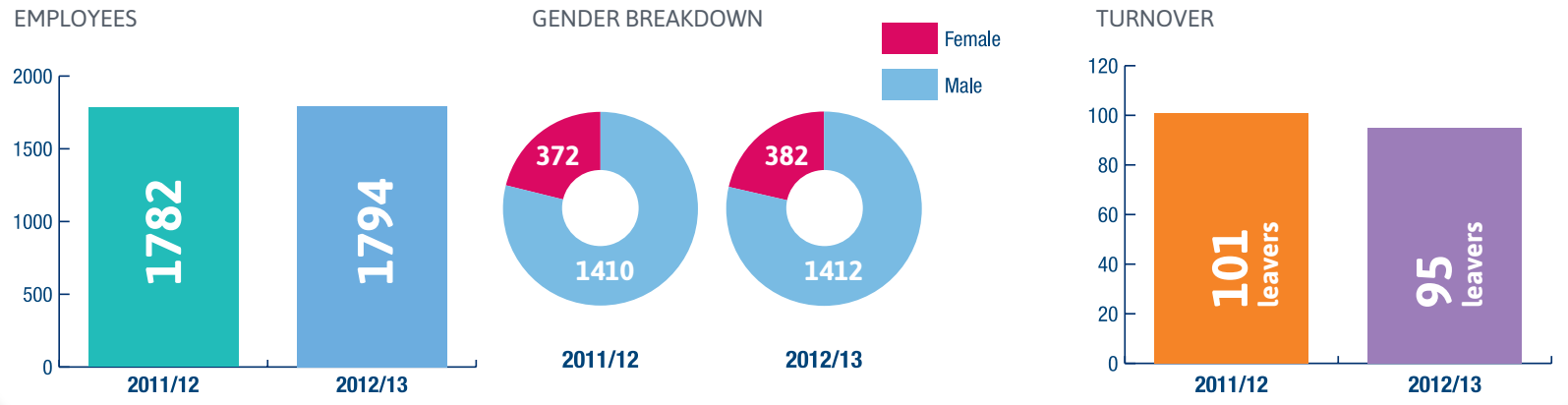
Workplace

Workplace

Our challenge

Our business plans run up until 2050 so it is vitally important we have a skilled, diverse workforce that reflects the communities in which we operate in order to implement these plans.

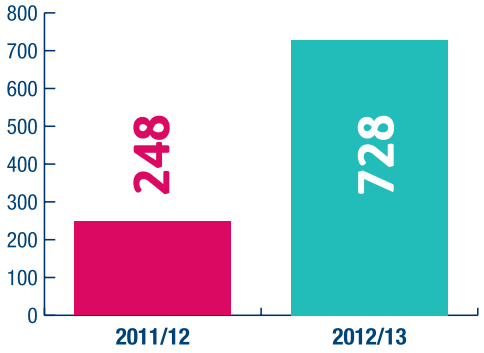
Overview



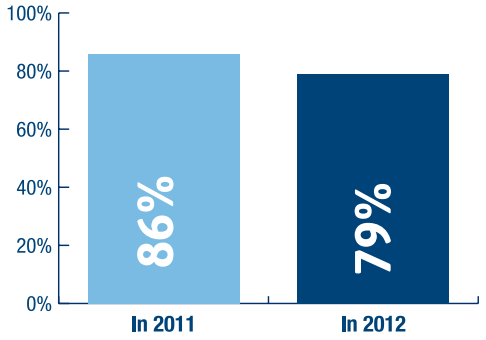
Overview

TRAINING DELIVERED
Non operational courses

TRAINING ATTENDEES
Non operational employees



EMPLOYEE OPINION SURVEY RESULTS



Marketplace

Marketplace

Our challenge

Providing electricity to a region as diverse as the North West is a challenge, but we manage it with a 99.99% reliability rate. We are constantly looking at ways to improve on this and enhance the service we provide to our customers.

We look at how we can increase performance in all areas of our business, including customer service, asset replacement and the performance of equipment. All of these add up to helping us providing the best service we can.

Customer satisfaction scores

Electricity North West Monthly Customer Satisfaction Scores April 12 - March 13

	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr
Overall Mean	73.30%	74.80%	74.30%	77.10%	77.10%	77.50%	76.00%	75.10%	77.10%	75.90%	72.70%	78.90%	75.90%
General Enquiries	**63.30%**	**73.40%**	**73.30%**	**81.50%**	**71.90%**	**69.20%**	**72.90%**	**69.20%**	**79.50%**	**73.30%**	**51.90%**	**75.50%**	**71.40%**

Network Reliability

We have an asset replacement scheme which is designed to replace assets at the end of their life with modern equivalents.

This scheme monitors assets and aims to replace them before they cease to function. We also routinely inspect and maintain assets to ensure they remain safe and continue to provide a high level of service. The total cost of this maintenance and inspection between 2010 and 2015 will be £110million which demonstrates our commitment to this important work.

Collaboration

In order to support and develop both the energy market and our sustianability activities, our senior leaders are active in various associations:

Energy Networks Association

Steve Johnson, CEO, was appointed chairman of the Energy Networks Association (ENA), the industry body for UK companies that carry electricity and gas to homes and businesses.

As chair of the ENA he plays a key role in representing the energy networks industry with ministers, politicians and regulators during an important period in the development and implementation of the Government's energy policy

BITC North West Advisory Board

Steve Johnson also accepted a position on the BITC North West Advisory Board in order to help shape and develop the priorities of BITC in the North West.

Energy & Utility (EU) skills Group

We are a member of the EU skills Group, which consists of EU Skills, the licensed Sector Skills Council (SSC) for the gas, power, waste management and water industries and the National Skills Academy for Power (the Skills Academy).

The National Skills Academy for Power has been created by Energy & Utility Skills (EU Skills) and employers in the power sector to address the skills challenge for the energy marketplace. As well as delivering the skills required to address the Government's energy challenge and support a low-carbon resource-efficient economy, the National Skills Academy for Power will raise the profile of the sector and be recognised as a key factor in maintaining the security of the UK power supply.

Climate Change North West

The Climate Change North West Partnership is a group of organisations that work together to enhance the delivery of a shared vision of a low carbon and adapting region.

Cumbria and Greater Manchester STEM centres

In order to address the well documented shortage in students studying Science, Technology, Engineering and Maths (STEM) subjects, we have partnered with Greater Manchester and Cumbria STEM centres in order to inspire and excite the next generation in these subjects. These organisations collaborate with schools and business in order to provide students in the North West with the opportunities and access to STEM subjects and the careers these could lead to.

BUSINESS IN THE COMMUNITY

energy&utilityskills

climatechange northwest.co.uk

Cumbria STEM Centre

Environment

Environment

Our challenge

Reducing our impact on the environment is key as we move towards a low carbon economy. This move will include an increase in the amount of electricity used and we know that we have a big role in facilitating this transition.

Recycling figures

Site	Weight (tn)	Weight (tn)	Vol. (m3)	Vol. (m3)	Total	Total
Name	Rec	Land	Recycled	Landfill	Weight (tn)	Vol. (m3)
Borron Street	32.9	13.3	126.67	51.21	46.20	177.87
Frederick Road	69.1	23.9	266.04	92.02	93.00	358.05
Hartington Road	74.5	36.9	286.83	142.07	111.40	428.89
Hill Top Depot	50.9	31.8	195.97	122.43	82.70	318.40
Parkside Road	153.8	11.7	592.13	45.05	165.50	637.18
Whitegate Depot	20	9.2	77.00	35.42	29.20	112.42
Whitebirk Depot	49.6	31.6	190.96	121.66	81.20	312.62
Workington Depot	84.5	5.8	325.33	22.33	90.30	347.66
TOTALS:	**535.3**	**164.2**	**2060.91**	**632.17**	**699.50**	**2693.08**
					Total Recycled	**77%**

Operational Carbon Footprint 2010 – 2013

	2010/11 tonne CO2 Eq	2011/12 tonne CO2 Eq	2012/13 tonne CO2 Eq
Buildings energy usage	11,872	11,362	9,918
Operational transport	9,150	9,912	9,894
Business transport	1,136	1,272	1,303
Fugitive emissions	3,387	1,332	1,199
Fuel combustion	2,435	2,395	2,774
BCF (excl losses)	**27,980**	**26,273**	**25,088**
Losses	971,037	670,540	652,308
BCF (incl. Losses)	**999,017**	**696,813**	**677,396**

For more detailed information regarding this data, please see our Business carbon footprint report 2012/13, available on our website.

100 commitments – update

Our 100 commitments came about after discussions with various stakeholders revealed the desire to have defined, long-term targets. The commitments detailed have all been through the necessary approval channels to ensure business buy-in and robust monitoring.

Last year we stated 24 commitments, and below is an update on how these are progressing.

Community

Commitment	Target	When by	Update
To support an employee nominated corporate charity increased to £4000 for 2014	£2000 through Employee donations	Dec 2013	Met, raised £2,900. Target
Set up a CSR forum to help steer and develop our Strategy	six meetings per annum	Sep 2013	7 sessions held, ongoing
Take part in safety awareness sessions throughout the north west	four sessions	Nov 2013	Completed via schools programme
Educate our customers about what we do and the importance of the work we carry out		2015	
Work with key stakeholders to minimise any disruption our work causes	100 sessions delivered	July 2014	Ongoing
To work with businesses to understand and prepare for the future changes to electricity	50 sessions delivered	July 2014	
To provide 10,000 hours of employee support	10,000 hours	May 2019	Ongoing

Workplace

Commitment	Target	When by	Update
To invest in a new training facility	training centre open	August 2013	Completed, opened in September 2013
Engage with 85% of our people in the annual Employee Opinion Survey	Minimum response of 85%	September 2013	On hold as we review this process
Measure the number of 1:1s and team briefs delivered across the business	Metrics TBC	March 2013	On hold as we implement new internal procedures
Introduce a diversity forum	six meetings per year	Dec 2013	Completed
Actions to improve driving standards and reduce Road traffic accidents	Reduction	Ongoing	Ongoing
Provide customer service training to all employees Once every two years	All employees to attend	December 2013	Extended to December 2014
Produce an annual CSR report detailing our CSR progress	Report annually	November annually	completed
Integrate CSR metrics into monthly reporting to ensure companywide accountability	Include CSR scorecard at monthly ELT meeting	December 2013	Extended until July 2014

Marketplace

Commitment	Target	When by	Update
Maintain ISO14001 accreditation for Environmental management	Maintain	Ongoing	On target
Maintain our OHSAS18001 accreditation for Health and safety management	Maintain	Ongoing	On target
Maintain our IET accreditation for our graduate programme	Maintain	Ongoing	On target
Maintain our PAS55 accreditation	Maintain	Ongoing	On target

Environment

Commitment	Target	When by	Update
Develop safety educational content for our public Website and learn website	2,000 page views	Dec 2013	On hold whilst we assess the educational content
Introduce car charging points at key locations for Future technological developments	Car charging points in 2 locations	Dec 2014	completed, charging points at 2 depots.
To continue undergrounding overhead cables In appropriate locations	£7million investment	Dec 2015	Ongoing
Convert 5% of the fleet to electric hybrid	5% of fleet	Dec 2023	Ongoing

New targets

In addition to the already agreed targets, we have agreed our next set of targets which are below:

Community

Commitment	Target	When by
Safety campaign to all who come into contact with our network	Education scheme in schools	July 2014

Marketplace

Commitment	Target	When by
Further improvement in CLs and CMLs	20% reduction	2019
Introduce Sustainability scoring matrix on tender process	Dec 2014	

Environment

Commitment	Target	When by
Cut our carbon footprint	20%	2020
Complete asbestos remediation at high risk and low risk sites	656 per annum	TBC
Complete flood protection at major sites at risk of flooding	56 substations	TBC

About this report

This report details the performance and achievement of our CSR activities. It covers the areas we have identified as most material to our business where we have operational control.

Figures in this report relate to our operating year running from April 2012 to March 2013, unless otherwise stated. We produce our CSR report annually; our last report was published in November 2012, and is available on our website.

In reporting our performance, we are guided by the Global Reporting Initiative's (GRI) G3 Sustainability Reporting Guidelines. For information relating to the Guidelines, please visit the GRI index. This report is produced for our key stakeholders as detailed in Stakeholder Engagement (page 13).

Risk Management

Electricity North West has in place a Risk Management Framework for identifying, assessing and prioritising risks that may threaten the achievement of business objectives, implementing economical strategies to manage them and designing and implementing action plans to supplement those strategies.

In order to assess and prioritise our CSR activities, we have recently instigated a CSR governance structure to ensure proper alignment between business and CSR goals.

Assurance

Our current operating structure and engagement with stakeholders, supports our commitment to full disclosure and reporting. We do not currently seek external assurance for our CSR reporting, however we participated in the Business in the Community Corporate Responsibility Index for the first time in 2012, scoring 54%, and will continue to going forward. This coupled with our robust independent certification and stakeholder engagement programmes provides an added authority and significance to our CSR programmes and reporting.

GRI index – G3.1 at level B

	GRI reference	Inclusion	Page in report	Documented elsewhere
Strategy and analysis	1.1 Statement from CEO	Yes	5	AR, SDS, NIP
	1.2 Key impacts, risks & opportunities	Yes	17/18	AR, SDS, NIP
Organisational profile	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10	Yes	7-11	AR
Report parameters	3.1, 3.2, 3.3, 3.4,	Yes	38	
	3.5 Report Scope and Boundary	Yes	26	
	3.6, 3.7, 3.8, 3.9, 3.10, 3.11, 3.13	No		
	3.12 GRI content index	Yes	39	
Governance, Commitments & Engagement	4.1 Governance	Yes	10	
	4.2, 4.3, 4.10,			AR
	4.4, 4.5, 4.8			AR
	4.6, 4.7, 4.9, 4.11, 4.12, 4.13,	No		
	4.14, 4.15, 4.16, 4.17	Yes	13-15	
Environmental materials	**EN1, EN5, EN6, EN7**	No		
	EN2, EN3, EN4,	Yes	32 - 33	
Water	**EN8, EN9, EN10**	No		
Biodiversity	**EN11, EN12, EN13, EN14, EN15, EN18**	No		
Emissions, effluents & waste	EN16, EN17, EN19, EN20,	Yes	33	CFR
	EN21, EN22, EN24, EN25, EN27			
	EN23,			AR

GRI index – G3.1 at level B

	GRI reference	Inclusion	Page in report	Documented elsewhere
Products & services	EN26,			AR, SDS, CFR, NIP
Compliance	**EN28**	No		
Transport	**EN29**	No		
Overall	**EN30**			NIP
Human Rights	**HR1, HR2, HR3, HR4, HR5, HR6, HR7, HR8, HR9, H10, H11**			
Labour Practices and Decent work	LA1, LA2, LA10	Yes	26 - 27	
	LA3, LA15, LA4, LA5, LA6, LA7, LA8, LA9, LA11, LA12, LA13, LA14	No		
Society	SO1, SO9, SO10, SO2, SO3, SO4, SO5, SO6, SO7	No		
	SO8			AR
Product responsibility	PR1,			NIP
	PR2, PR3, PR4, PR5, PR6, PR7, PR8, PR9	N/A		
Economic	EC1, EC3,			AR
	EC2, EC4, EC5, EC6, EC7, EC8	No		

AR: Annual Report and Consolidated Financial Statements
CFR: Carbon Footprint Report
NIP: Network Investment Plan
SDS: Strategic Direction Statement
Bold text: Not reported

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We engage with our stakeholders through various means,