Shanks

Shanks Group plc
Corporate Responsibility Report 2012

MAKING MORE **FROM WASTE**

Group highlights

Highlights

More information on our health & safety performance on **page 22**

More information on our recycling and recovery performance on **page 12**

Corporate responsibility highlights

- Reportable accident rate improved by 13%
- Overall recycling and recovery rate up to 78% from 77% last year
- 1.28 million tonnes of carbon avoided
- Local neighbourhood complaints fell by 32%

Operational highlights

- Initial £100m strategic investment programme within target range – overall annualised post tax return of 12.2% for projects which are fully up and running
- Next phase £150m strategic investment programme on track
- The UK business delivered 6% revenue growth and UK Municipal PFI/PPP contracts achieved 10% trading margins up from 6.4% last year
- The Organics business across all our markets delivered 28% revenue growth and trading margins increased from 13% to 18%
- Another strong performance from our Dutch Hazardous Waste business with trading profit up 26% in the year

Financial highlights

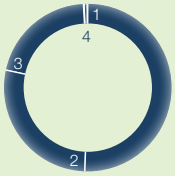
- Robust performance in challenging trading conditions
- Underlying profit before tax up 8% at constant currency
- Management actions delivered £11m of cost savings to offset challenging market conditions in our Solid Waste businesses
- Strong cash generation with underlying free cash flow conversion at 81%
- Net debt to EBITDA ratio of 1.7 times versus our target of below 2.5 times and covenant of 3.0 times

Key facts and figures

More information on our people on page 24

Average number of employees

1	Netherlands	2,072
2	Belgium	1,135
3	UK	857
4	Canada	30
	Group	**4,094**



Active operating centres

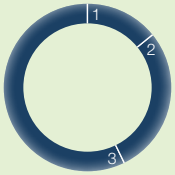
1	Netherlands	42
2	Belgium	20
3	UK	39
4	Canada	2
	Group	**103**

Operating centres with recycling/recovery

1	Netherlands	36
2	Belgium	11
3	UK	18
4	Canada	2
	Group	**67**

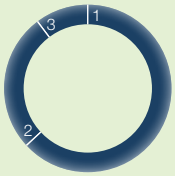
Operational landfill sites

1	Netherlands	1
2	Belgium	2
3	UK	4
4	Canada	–
	Group	**7**



Collection and transport lorries

1	Netherlands	861
2	Belgium	362
3	UK	137
4	Canada	–
	Group	**1,360**



Tonnes waste handled million tonnes

1	Netherlands	4.87
2	Belgium	1.18
3	UK	1.62
4	Canada	0.18
	Group	**7.85**

Tonnes materials recovered million tonnes

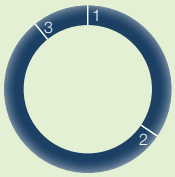
1	Netherlands	4.30
2	Belgium	0.87
3	UK	0.76
4	Canada	0.16
	Group	**6.09**

Overall recycling and recovery rate

1	Netherlands	88%
2	Belgium	74%
3	UK	47%
4	Canada	89%
	Group	**78%**

Energy generated 000' megawatt hours

1	Netherlands	39
2	Belgium	62
3	UK	12
4	Canada	–
	Group	**113**



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Cover image

Optical sorting of wastes at Shanks' new Kettering MRF, the UK

1

About Shanks

Our vision and our strategy

Shanks is a leading international sustainable waste management business.

The driving forces behind our industry are climate change, fossil fuel dependency and society's need to manage waste without damaging the environment.

Shanks Group uses sustainable and cost-effective technologies to make valuable products from what is thrown away. We produce green energy, recovered fuel, recycled commodities and organic fertiliser, while generating favourable returns for our shareholders.

With over 4,000 employees and operations in the Netherlands, Belgium, UK and Canada, Shanks is at the forefront in providing sustainable waste management solutions for both the private and public sector.

More information can be found at: **www.shanksplc.com**

About Shanks

Our vision and our strategy

Shanks has a clear, aspirational and achievable vision to be:

The leading provider of sustainable waste management solutions in our target markets.

Leading Provider
Defined as high market share and with clear competitive advantages

Waste Management Solutions
Combining technologies to make valuable products from waste

THE LEADING PROVIDER OF SUSTAINABLE WASTE MANAGEMENT SOLUTIONS IN OUR TARGET MARKETS

Sustainable
Providing effective alternatives to landfill and mass incineration

Target Markets
Markets with high sustainable growth drivers and potential for high recycling rates

Our strategy is a simple one: to create value by making products from material that is otherwise thrown away.

Our four strategic priorities to deliver this are:

1. Invest in **new sustainable opportunities** that build on our core capabilities and generate attractive returns

2. Deliver **outstanding operational performance** from existing businesses and investments

3. Develop world-class **capabilities and technologies** in a cohesive Group culture

4. Actively **manage Shanks' portfolio and use bolt-on acquisitions** to accelerate profitable growth

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Chief Executive's statement and a sustainable business

Leading for corporate responsibility

Sustainability is at the heart of Shanks' business. Our strategy is to create value by making products from material which is otherwise thrown away.

Peter Dilnot
Group Chief Executive

This is my first introduction to a Corporate Responsibility Report since joining Shanks in February 2012. In my first few months I have been very encouraged by how seriously the Shanks team takes its responsibilities to the environment, employees, and the wider community. I am determined that under my overall leadership we will continue and enhance our efforts in these important areas.

Sustainability is at the heart of Shanks' business. Our strategy is to create value by making products from material which is otherwise thrown away. This results in a unique position in the waste management market as we avoid burying waste in landfill sites or burning it through mass incineration. We believe that recovering material through recycling and the production of green energy makes sense for the environment, while generating returns for our shareholders.

Sustainability however means more to us than the environmental benefits of green energy, carbon reduction and easing the pressure on natural resources. We strive to be sustainable in how we manage our employees and support their wellbeing. At Shanks, we also play a major role in helping our customers meet their own sustainability commitments – and take pride in doing so.

Whilst we already have high standards, we can always improve and it is with great sadness that I must report a fatal accident in November 2011 involving one of our lorry drivers. The rapid and comprehensive response to this across the Group reassures me that where improvements are required Shanks is determined to make these quickly and effectively. To ensure we improve further we have also established a dedicated Group Health & Safety Committee aimed at adding to the benefits already being gained from the safety leadership initiative we introduced in 2011.

I am committed to ensuring that we match our commercial aims of being a sustainable waste manager with those of being a good corporate citizen. This commitment is not based solely on a desire to 'do the right thing', but on a belief that we must do this to be a successful business. This report contains a wide variety of data, information and case studies which illustrate our approach to CR. It also includes information on our progress towards the key CR objectives we set ourselves three years ago. Ultimately, this report measures how well we are living-up to our commitments.

Feedback from all of our stakeholders is important to us. If you have any comments on this publication I would encourage you to contact us using the details at the back of the report. Thanks for your support and interest.

A business centred on sustainability

Our vision is to be the leading provider of sustainable waste management solutions in our target markets. Sustainability is at the heart of all that we do and all that we provide for society and our other stakeholders. As a sustainable business, we report on our corporate responsibility performance across three main areas:

- **Environmental sustainability**
- **Our sustainable approach to our people**
- **Sustainable relations with the wider community**

Environmental sustainability

Environmental sustainability is about reducing the use of non-renewable resources, avoiding or off-setting emissions, in particular carbon, and sustainable energy use. These areas are core to Shanks' business model. We take society's waste and make more of it by turning the waste into products and energy.

Our recycling facilities turn waste into recyclate products which replace virgin raw materials. Our recovery operations produce renewable fuels which displace fossil, non-renewable fuels or even produce such green energy direct. In the past year we have brought on line more than 300,000 tonnes of entirely new waste recycling and recovery capacity aimed at fulfilling our strategy.

Read more about how we support environmental sustainability on **pages 10–19**

A sustainable approach to our employees

Our people are critical to our success. We need to have well motivated employees who contribute fully to progress our strategy. The wider aspects of employee wellbeing are important. However, we accept that we operate in a high-risk sector and for us employee health & safety is a critical issue.

Read more about our sustainable approach to our employees and our health & safety performance on **pages 22–25**

Sustainable relations with the wider community

To grow as a sustainable business we need the support of the wider community. As society moves away from landfill and mass incineration towards sustainable waste management we must align our sustainable offerings with society's needs. At the same time we must also reduce any potential impacts our activities may have on those who live near to our sites.

Read more about the wider community on **page 28**

Sustainability is at the heart of all that we do and all that we provide for society and our other stakeholders.

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Our objectives

Our key CR objectives and progress

We measure our corporate responsibility (CR) and sustainability performance across a wide range of indicators. We use this data to manage our business and to seek improvement.

To give focus to our efforts we have three key, long-term CR objectives which best reflect our strategy, business model, the potential impacts and benefits of our activities and the critical risks we face.

1 **Increase the carbon avoidance** we facilitate for society from our activities to more than 1.3 million tonnes a year

2 **Improve our recycling and recovery rate** to more than 80% of the wastes we handle at our sites

3 **Reduce our employee accident rate**, measured as more than three day absence incidents, by 25%

These key objectives were set in our 2010 Corporate Responsibility Report, run over five years and were chosen following an extensive review by our Group CR Committee. They have the full approval and backing of our Group Executive Committee.

Why are they key targets for us?

And how are we doing?

1 Carbon avoidance

Our sustainable waste management activities deliver carbon benefits. Recyclate products reduce the need for virgin raw materials which require significant carbon emissions to extract. Waste derived fuels displace fossil fuels. Electricity generated by waste management facilities replaces electricity produced from non-renewable sources. Measuring the carbon avoidance we produce provides an indication of how well we are supporting society's move towards a sustainable future. It is also a key performance measure of how well we are living-up to our own strategy.

Objective

Increase the carbon avoidance from our activities to more than 1.3 million tonnes a year by 2015.

Progress

In the 2011/12 year we produced 1.28 million tonnes of carbon avoidance. This performance sets us well on the way to meeting our objective.

2 Recycling and recovery rate

Recycling and recovery operations divert wastes from landfill and mass incineration. They also reduce the use of non-renewable resources and provide a carbon benefit. Our recycling and recovery rate is a key indicator of the benefits of our activities and of how well we are living-up to our strategy.

Objective

Increase the recycling and recovery rate of our facilities to more than 80% by 2015.

Progress

In 2011/12 our overall recycling and recovery rate was 78%. When we first set this objective our recycling and recovery rate was 70% and we expect our recent and planned investments to deliver even higher performance.

3 Accident rate

Waste management is a known high-risk sector with accident rates comparable to those in construction and agriculture. Shanks has a good record on health & safety and is continuously seeking to improve. For example our safety leadership scheme, introduced in 2011 and our new Group Health & Safety Committee launched in early 2012. Safety performance continues to be a key performance indicator for us – one of the basic rights of employees is that they work in an environment which is, so far as practical, free from risks to their health and personal safety.

Objective

Reduce our accident rate, measured as more than three day absence incidents, by 25% by 2015.

Progress

In 2011/12 our accident rate improved by 13%. This performance stands us in good stead to meet our 2015 target.

4

Environmental sustainability

"I am convinced that recycling is the best option. We must ensure future generations can live in a healthy environment and Shanks' goal to make more from waste supports this."

Marcel Koen is a director of Vliko, one of Shanks' major recycling operations in the Netherlands, and has worked for the company since 1998. With major clients such as Heineken and Unilever, Marcel understands the market thoroughly.

"In 2008 we built a completely new sorting line, based on years of experience of our clients' needs. Recently we extended this line with optical sorting that can separate plastics and paper automatically from residual wastes. This was done directly to serve the needs of our customers," commented Marcel.

"An important group of customers stays with us and new ones join us because Shanks is the only major waste management company in the Netherlands which has chosen to expand their recycling rather than incineration capacity." On a more personal note Marcel continued, "I am convinced that recycling is the best option. We must ensure future generations can live in a healthy environment and Shanks' goal to make more from waste supports this."

On changing customer needs Marcel commented: "Increasingly we have to assess our customers' processes so we can advise on how these may be adjusted to increase recycling rates. For example, in 2007 we established a joint client and Shanks employee group for one of our major national accounts. When we started this group the customers' separation rate for their wastes was 80% – five years later it is now 98%."

Day in the life: recycling director

"My regular working day starts with a site tour with my managers responsible for transport, maintenance and recycling. After this I usually go through my e-mails and make regular daily telephone calls to our sales team to see how business is doing.

"A typical day continues with appointments with customers. The topics discussed vary widely, from specifications for recovered glass and customer recycling aspirations to negotiating tenders. I also make time to visit our own locations, such as Shanks Kluivers where we sort paper, plastics and metals. Regular personal contact is important to keep up to date with our day-to-day business.

"Finally I always spend an hour with an open door to discuss ongoing business with my managers, who know they can just wander into my office without an appointment. At the end of a busy day I go home to spend quality time with my wife and three children."

Environmental sustainability

How do we contribute to environmental sustainability?

Society needs to be more sustainable. Moving towards sustainability can be achieved by means such as energy efficiencies, lessening how often consumer items are replaced and reducing the amount of non-renewable resource used in products. However, consumption cannot practically be reduced to zero and a complementary approach is to seek renewable alternatives.

Westcott Park AD plant under construction

Our second AD facility in the UK is a 48,000 tonnes per annum facility which will generate up to 2MW of renewable energy.

Waste is a renewable resource. Reducing the volumes of waste produced by society is desirable, but some waste will always be produced. Using this waste as a resource by making more from it provides both renewable materials and energy. This is where Shanks contributes to environmental sustainability.

Providing renewable alternatives by making more from waste requires the development of different technologies and spreading the use of these. Shanks' strategy here is simple: Develop and provide more sustainable waste management capacity and increase the efficiency of our existing activities. This strategy provides the additional benefit of diverting waste from landfill and mass incineration disposal. Shanks' strategy provides renewable resources from waste and avoids the environmental detriment of disposal.

Being a sustainable business also provides us with commercial advantage. By providing what society wants we enhance our commercial success. We believe that more sustainable waste management technologies which make more from waste both satisfy society's sustainability needs and our own business requirements.

How we performed in supporting environmental sustainability?

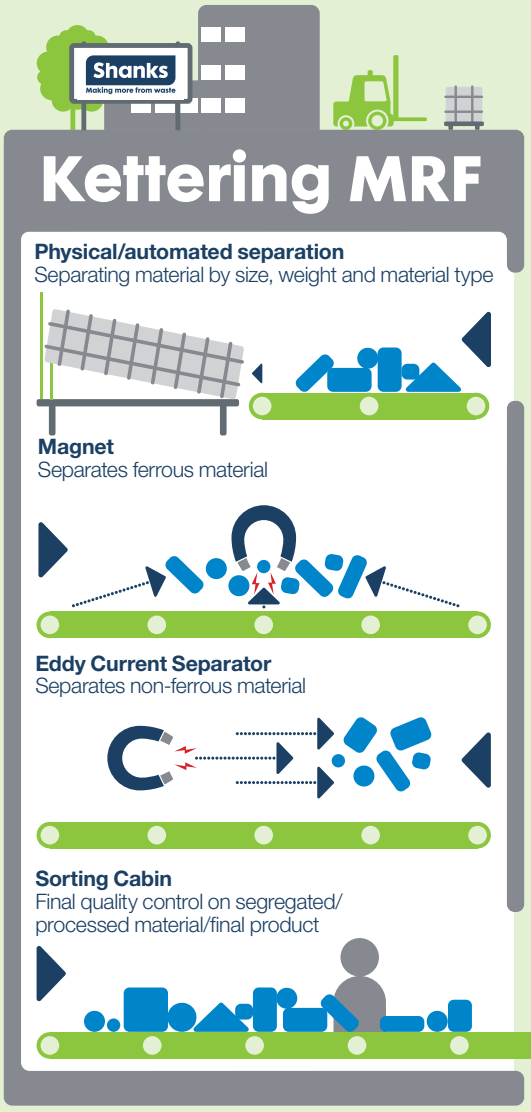
In the past year we have brought on line more than 300,000 tonnes of entirely new recycling and recovery capacity. We have also improved the efficiency of our current operations by adding to or modifying plant. Both have increased our recycling and recovery rate and reduced disposal by landfill or mass incineration.

All of our capital investment on wholly new facilities over the past year has been aimed at our recycling and recovery capacity. Examples are spread through this report, from our new recycling facility in Kettering in the UK to the work we do with our customers in the Netherlands.

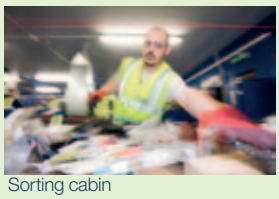
In the past year we have brought on line more than 300,000 tonnes of entirely new recycling and recovery capacity.

Kettering MRF

Kettering Materials Recycling Facility (MRF) in the UK is just one of the new sustainable waste management facilities we have built, commissioned and brought on line over the past year. The plant accepts commercial and other wastes and uses high-tech separation processes such as automatic optical sorting and air separation to produce quality recyclate products. These products are used by re-processors to replace virgin raw materials and as a recovered fuel to replace fossil energy. Capital investment in sustainable waste management facilities is a key strategy for Shanks and Kettering MRF is an example of this strategy in action.




Material being transported through the MRF


Sorting cabin

Shanks produces a range of waste derived fuels which are often manufactured to specific requirements and used by customers to offset fossil fuels.

Recyclates

Once sorted materials are sent to reprocessors where they are turned into new products reducing our dependency on virgin materials.

Environmental sustainability

Recycling and recovery

How do recycling and recovery facilities support sustainability?

Recycling and recovery facilities are core to Shanks' activities, strategy and business model. There are many different types of technology used in recycling and recovery plants. Those below are only examples of the technologies we use to provide sustainable solutions and to divert waste from landfill and mass incineration.

The key types of technology we use throughout the Group

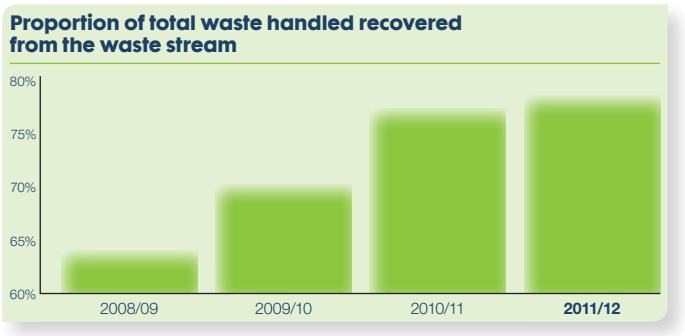
	Technology	Description
	**Sorting centre**	Sorting centres use rudimentary techniques to separate I&C and C&D waste into different fractions for onward transfer to more specialised processing centres such as Materials Recycling Facilities (MRFs).
	**Material Recycling Facility (MRF)**	MRFs use a combination of advanced optical, mechanical and manual sorting to separate co-mingled waste streams by shape, dimension, colour and material type to separate industrial and commercial/construction and demolition/municipal recyclates into various materials to feed established recycling markets. Shanks operates a large number of MRFs across the Group.
	**Mechanical Biological Treatment (MBT)**	MBTs use a combination of mechanical and biological treatment to dry, stabilise and sort Municipal Solid Waste (MSW) into various materials to feed recycling markets and Solid Recovered Fuel (SRF) for energy generation as a replacement for fossil fuel. Shanks works in partnership with Sistema Ecodeco to deliver MBTs in the UK. The process uses naturally generated heat from the degradation of the organic fraction within the MSW prior to mechanical sorting into various recyclates and SRF. Shanks is the sole waste management provider able to use Ecodeco technology in the UK.
	**Organics – Anaerobic Digestion (AD)**	AD enhances the natural breakdown in the absence of air of organic material from industrial and commercial and municipal sources to generate biogas for conversion into renewable energy and digestate for use as a nutrient rich soil conditioner. Our Organics business, Orgaworld, has significant experience in the design, build and operation of installations and offers a wide scope of processing techniques for the total range of organic waste focusing on traceability and sustainability.
	**Organics – Composting**	Composting enhances the natural breakdown in the presence of air of organic material from industrial and commercial and municipal sources to generate a quality pathogen free soil enhancer/conditioner for use in landscaping and/or agriculture. This is a key technology in the growing Canadian market where there is limited competition.
	**Hazardous Waste – specialised treatment processes**	There are three principal processes at the ATM plant in the Netherlands: • Thermal treatment of contaminated soils • Biological and physio-chemical treatment of waste water • Pyrolysis of paint waste ATM is one of the world's largest single site hazardous waste facilities. In addition, the Group operates industrial cleaning services to the oil and gas, petrochemical and other large industries. Together, these businesses can offer the proposition of total care services for hazardous waste offering cleaning, logistics, handling, management and waste treatment solutions.

How we performed

Recycling and recovery rates

	Netherlands[1]		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Total waste handled at Shanks sites (million tonnes)	**5.05**	4.88	**1.18**	1.24	**1.62**	1.55	**7.85**	7.66
Amount of materials recovered from the waste stream at Shanks sites (million tonnes)	**4.55**	4.23	**0.87**	0.92	**0.76**	0.66	**6.09**	5.87
Proportion of total waste handled recovered from the waste stream (%)[2]	**88**	88	**74**	74	**47**	43	**78**	77

1 Shanks Netherlands data includes waste handled and recycled/recovered by Shanks Canada
2 Includes water recovery and moisture loss during treatment for some technologies employed



Environmental sustainability

Avoiding carbon by making more from waste

The importance of carbon

Carbon and energy use are inextricably linked. In most cases whenever energy is used to provide electricity, as fuel to power a vehicle or during the manufacture of a product the result is carbon emitted to the atmosphere. Reducing carbon emissions is a key cornerstone of a sustainable society. In addition, many carbon emissions come from non-renewable resources and the issue of energy security is a rising concern.

How we avoid carbon

For most organisations carbon sustainability means energy use reduction and efficiency. For a waste management company the situation is more complex and may be demonstrated by example.

A landfill site will use energy: Electricity to light and heat offices and welfare facilities and to power the weighbridge which measures how much waste is being received, diesel to fuel the heavy mobile plant used to move wastes and so on. A recycling plant will also consume energy for all of these uses. However, it will also use energy to power the recycling equipment it needs to perform its function. As a result a recycling plant will use more energy for every tonne of waste received than a landfill site. Does this mean that landfills are better for carbon and the environment than a recycling facility?

Of course the answer to this question is no. Landfill sites produce methane which is a powerful greenhouse gas. A recycling plant produces recyclate products so avoiding the carbon burden associated with virgin raw materials. Simply using energy consumption and efficiency as the only measure of carbon will not reveal this and for waste management companies a more sophisticated measure is required.

For this reason we use carbon avoidance as our key measure of carbon sustainability. We can measure how much carbon is avoided as a result of the recyclate materials we produce, the green electricity we generate and the waste derived fuels we supply. For example, if a power station is using coal as its fuel the amount of carbon emitted for each tonne of coal burnt can be calculated. Likewise if the same power station is using a waste derived fuel we can also measure how much carbon will be emitted. The carbon avoidance is the difference between these two figures.

This does not mean that our energy use is not also important. We measure and report on this and seek ways to use less energy and become more energy efficient, such as the eco-driving initiative highlighted on page 17 of this report. However, the carbon avoidance our activities produce is the key measure in our carbon footprints.

In 2010/11 Shanks Netherlands activities avoided 715,000 tonnes of carbon through the generation of green electricity and production of fuels and recyclates from wastes...

Netherlands Carbon Ladder

Shanks Netherlands carbon footprint is now certified under the Independent Foundation for Climate Friendly Procurement and Business' carbon performance ladder. To achieve this Shanks NL had to completely review its carbon inventory using new factors embedded in the scheme. The main outcome being that in 2010/11 Shanks NL emitted 408,000 tonnes of carbon dioxide in the year, mainly from processes. But, the business avoided 715,000 tonnes through the generation of green electricity and production of fuels and recyclates from wastes. This is a significant change from the previously reported data and full details are noted against Shanks NL's carbon footprint in this publication. The major reason for the change was the inclusion in the scheme of substitute fuels at Shanks ATM facility, which provided a benefit of 244,000 tonnes of avoided carbon.

Environmental sustainability

Avoiding carbon by making more from waste

How we performed in helping reduce society's carbon footprint

This is our Group carbon footprint. It is split into two sections. The first shows our carbon emissions, whether from fuel use, process emissions or other sources. The second sections show the carbon avoidance benefit our activities produce for society. As can be seen, the overall carbon benefit of our activities is obvious – and our objective is to increase this benefit even further.

Shanks Group

CO_2 equivalent ('000 tonnes)[1]	Group	
	2011/12	2010/11
Emissions from our activities		
Process based emissions		
Emissions from anaerobic digestion	**9**	3
Emissions from composting	**41**	39
Emissions from hazardous waste treatment	**287**	282
Emissions from landfill	**100**	140
Emissions from mechanical biological treatment (MBT)	**13**	12
Transport based emissions		
Fuel used by waste transport vehicles[2]	**80**	85
Energy use emissions		
Electricity used on sites and in offices	**48**	47
Gas used on sites and in offices	**9**	9
Fuel used on sites and in offices for plant and equipment/heating[3]	**23**	23
Total emissions from significant sources	**610**	640
The emissions we avoided for society by our activities		
Renewable energy generated	**36**	25
Waste derived fuels produced and sold	**652**	613
Materials separated for re-use/recycling (some re-used directly, others undergo re-processing by third parties)	**588**	586
Total potential avoided emissions	**1,276**	1,224[5]

1 Figures rounded to nearest 1,000 tonnes – totals may reflect rounding
2 Includes business travel for Shanks NL
3 Includes heat use on site for Shanks NL
4 For significant changes see individual country carbon footprint footnotes in the 'making more from waste: the full data' section of this report.
5 See Shanks NL footprint for details of revisions to data based on the Netherlands Carbon Ladder scheme.
Note data for 2011 revised in line with the Netherlands Carbon Ladder scheme

Shanks Liège-Luxembourg's aim is to reduce fuel consumption, carbon emissions and accident damage each by 5%

Eco-driver training

Improved technology makes today's lorries safer and more environmental through lower emissions. However, driver attitude and driving technique also have a critical impact. Drivers who accelerate and brake harshly and do not anticipate road conditions use more fuel. Since March 2011 Shanks Liège-Luxembourg has employed a dedicated eco-driving trainer, Pablo Gomez. The aim is to reduce fuel consumption, carbon emissions and accident damage each by 5% – targets which have been embedded in the operation's driver bonus schemes. Pablo not only carries-out driver training, he also analyses and reports on individual driver performance. Drivers who do not perform well are retrained. It is not only existing drivers who come under Pablo's scrutiny, he also assists in the recruitment of new drivers. The scheme has been so successful that it is being rolled-out to all of Shanks Wallonia and Brussels operations.

Environmental sustainability

Wider environmental indicators

Reporting emissions and resource use – an example of stakeholder engagement

Carbon and recycling and recovery rate are our key environmental sustainability indicators. But how much resource we use as a business is also important, as are our non-carbon emissions. Resource use is a straightforward measure, but for a Group like Shanks emissions are a more complicated issue.

We use many different technologies. This is not the case for many other organisations which may only use only one or two technology types. Each of the different technologies we use has different significant emissions. The emissions which are significant for a landfill site will differ greatly from those for a recycling plant, which will vary from those relevant to a mechanical biological treatment facility.

This is not to say that we do not monitor our emissions. We do and this information is critical for the management of our individual sites. But, presenting this data together can be confusing and we have not reported publicly on our emissions beyond carbon in the past.

Reporting of emissions has been a topic of our stakeholder engagement dialogue over the past year. There have been two significant outputs: This report now includes an overview of our significant emissions (see 'making more from waste: the full data' secion) and a much more detailed document has been placed on our Group website. This more detailed 'wider environmental indicators' document provides readers with both a synopsis of our significant emissions by technology type and an in-depth list of emissions both split by our main countries of operation and as Group totals.

This is a new approach for us, has resulted direct from our stakeholder dialogue and is aimed at greater transparency. We would welcome further stakeholder engagement on this issue. If you have any comments or suggestions for improvement to the way we present our emissions data please contact us using the details at the end of this publication.

Monitoring emissions

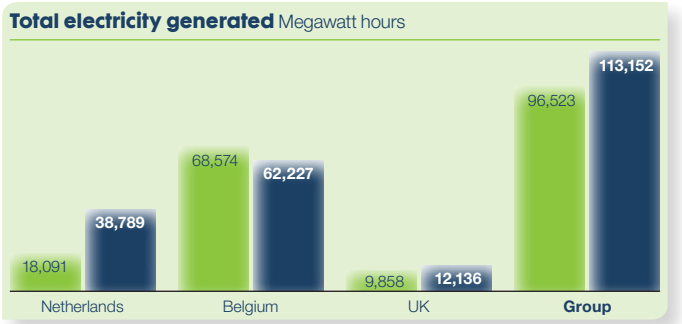
Analysis of our emissions is a routine and critical task.

We monitor our emissions... and this information is critical for the management of our individual sites.

Wider environmental indicators: Resources and consumption

Indicator	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Electricity consumption at sites and offices ('000 Kilowatt hours)	**94,988**	84,942[5]	**17,456**	15,773	**25,608**	24,869	**138,052**	125,584
Gas used at sites and offices (cubic metres)	**5,033,000**	5,182,000[5]	**969**	1,399	**40,265**	33,051	**5,074,234**	5,216,450
Fuel use at sites and offices ('000 litres)[2]	**4,787**	4,520[5]	**1,650**	1,750	**1,175**	1,072	**7,612**	7,342
Fuel used in waste collection and transport vehicles ('000 litres)[2]	**15,044**	14,233[5]	**9,169**	10,327	**2,681**	3,863	**26,894**	28,423
Total electricity generated (Megawatt hours)	**38,789**[7]	18,091	**62,227**	68,574	**12,136**[8]	9,858	**113,152**	96,523
Water used at sites – potable water ('000 m^3)[3]	**307**	224	**26**[6]	112	**45**[4]	38	**378**	374
Water used at sites – surface water ('000 m^3)[1,3]	**4,909**	–	**5**	–	**0**	–	**4,914**	–
Water used at sites – groundwater ('000 m^3)[1,3]	**16**	–	**42**	–	**0**	–	**58**	–
Water used at sites – rain water ('000 m^3)[1,3]	**20**	–	**37**	–	**0.5**	–	**59.5**	–
Water used at sites – grey water ('000 m^3)[1,3]	**713**	–	**77**	–	**0**	–	**790**	–

1 Data not declared separately in 2011 report
2 Diesel fuel used (for site use mainly in heavy mobile or static plant)
3 Data rounded to nearest 1,000 m^3
4 Increase the result of new sites being brought on line and likely increased use for dust suppression
5 Data recalculated in line with Netherlands Carbon Ladder scheme. Group total data for these measures likewise restated for 2010/11
6 Reduction the result of all water use being reported as potable in previous years – now split between different categories as shown
7 Increase the result of new installed generation capacity such as at Shanks NL's Amsterdam AD Plant
8 Increase the result of new generating capacity being brought on line



5

Our people and health & safety

"Good companies, like Shanks, understand the positive effects safety can have on employee loyalty and productivity."

Martine Pottier is Safety Adviser for Shanks' Roeselare facility in Belgium. Having worked for Shanks for 12 years Martine is well placed to comment on how we approach health & safety.

"Unsafe companies have poor reputations and low employee morale. Good companies, like Shanks, understand the positive effects safety can have on employee loyalty and productivity. If an organisation cares about its people, then it must ensure their health & safety," said Martine when asked why she believed Shanks puts so much effort into safety.

"Of course we are not perfect and must always try to improve. The 12 key safety essentials we released last year are a good example of improvement – clear messages for everyone on common safety standards."

On the topic of what she brings personally to Shanks' safety effort, Martine noted: "It is always difficult to prove the benefits of good safety standards, but I believe it is in the daily assessment of how we work and striving always for improvement. Communicating with and gaining the involvement of employees is key – this is where I can make the difference as the link to ensure safety is embedded in the way we work."

Day in the life: safety adviser

"I normally arrive at work having given some colleagues a lift as part of our car-pool scheme: better for the environment and fuel costs. A typical first job of the day would be to meet with a contractor who will be working on site. Many of our contractors have worked for us before, know the safety standards we expect and want to ensure we will be happy with the way they plan to do any work.

"After on site work it's back into the office for tasks such as arranging health assessments and training. Competence is critical to good safety standards and health is as important as physical safety. I also often have meetings with customers, such as those we will be doing industrial cleaning tasks for. A typical issue may be fall protection while doing a job and I need to ensure that our employees will be safe and that the customer is not at risk – safety is part of the service we provide to customers.

"Then it's normally more office work to catch-up on paperwork. Writing reports, procedures and so on is all part of the job, although actually reinforcing and improving safety on site is my preference. Or, it might be preparing for meetings such as Shanks' new Group Health & Safety Committee."

Our people and health & safety

The importance of health & safety in a high risk industry

Waste management is a known high-risk sector with accident rates similar to those found in construction and agriculture. As a result health & safety is our primary concern. This is reflected in our key performance measure of accident rate. Continual improvement in our health & safety standards is one of our critical objectives.

Safety training

Machinery lock-off training at our new Kettering recycling plant.

How we aim to improve employee health & safety

Last year we introduced a new safety leadership initiative including key targets for directors, whose remuneration has been linked to health & safety performance. This year we have established a dedicated Group Health & Safety Committee, chaired by one of our country Managing Directors. These are both highly-visible indications of our commitment to leadership for safety.

As part of our safety leadership initiative more than 100 dedicated health & safety visits to our sites have been carried-out by our company directors over the past year. These visits include written reports by directors on their tours, mandatory engagement with employees on site and are backed by a formal training scheme which all directors must undergo. Our new Group Chief Executive underwent his site safety leadership training within three days of joining Shanks.

We are dedicated to involving our employees in health & safety improvements. In this report we have added a performance indicator highlighting the proportion of our operations which are covered by formal joint management and worker health & safety groups.

How we performed

From benchmarking Shanks is already a high safety performer. As can be seen from our improvement in accident performance over the past year, this is a risk area where we intend to keep improving.

Because of our high health & safety standards, it is with sadness that we must report our first employee workplace fatality in several years. This accident, which involved a collision between a vehicle being operated by one of our lorry drivers and part of a building structure on one of our Belgium recycling facilities, has not been subject to enforcement action. However, we still consider it with the utmost seriousness. As part of remedial actions following this incident we assessed more than 200 building structures across the whole Group and instigated specific actions at individual facilities. In addition, a Group-wide series of publicity alerts has been conducted and we are seeking through our newly formed Group Health & Safety Committee further improvements.

Employee wellbeing – health & safety

Health & safety: Accident performance[1]

	2011/12					2010/11				
	LTA	LTA rate	RIDDOR	RIDDOR rate	Fatal accidents	LTA	LTA rate	RIDDOR	RIDDOR rate	Fatal accidents
Netherlands	15	650	36	1,600	–	11	500	36	1,700	–
Belgium	4	365	56	5,100	1	6	500	70	6,100	–
UK	7	800	19	2,100	–	15	1,600	21	2,200	–
Group	26	600	111	2,600	1	32	800	129	3,000	–

1 For definitions of accident types (LTA and RIDDOR) see health & safety section in 'making more from waste: the full data' section)

Health & safety: Synopsis of RIDDOR accident performance

	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	2011/12	2010/11	2011/12	2010/11	2011/12	2010/11
RIDDOR number	36	36	56	70	19	21	111	129
RIDDOR rate	1,600	1,700	5,100	6,100	2,100	2,200	2,600	3,000
Change %	–6%		–16%[1]		–5%		–13%[1]	

1 Following the publication of our 2011 CR Report the RIDDOR accident data for Shanks Belgium was revised as the result of further investigations into accidents which occurred late in the year. For consistency the data above for 2011 is as reported in our 2011 CR Report. However, if the revised Belgian data is used the level of improvement shown by Shanks Belgium increases to 22% and the Group improvement, as a result, increases to 16%

Long-term RIDDOR accident performance – Shanks Group

Our people and health & safety

The importance of our people

We have a commitment to our people. This is a commitment to their development, their right to work in an environment which is free from discrimination and where their talents are used to the full. All of our people need to be competent in the tasks they perform and motivated. If we fail to achieve this we will not reach our sustainability targets, or comply with the strict regulation we operate under.

Training is critical to Shanks

Fire fighting practice at Shanks ATM, Netherlands.

This is a critical area for us because of the rapidly developing nature of the waste management sector and the increasing demand for new skills and qualities.

Having the best people in place, who are well motivated, can work effectively in teams and show leadership is a critical business advantage. Good people practices attract new employees and assist in retaining key people. We also believe simply that Shanks should be a good place to work and that we need to treat all our employees with integrity.

How we seek to improve

We encourage and promote leadership and team-working through employee engagement. Our training and competence schemes and leadership and team-building initiatives are continuously being improved. All of our employment policies are compliant with legislation. We are an equal opportunities employer. Full and fair consideration is given to applications from, and the continuing employment, career development and training of all people.

We promote a culture of two way communications and trade unions, works councils and other employee groups are involved wherever appropriate. Our approach to our employees is clearly outlined in our values.

How we performed

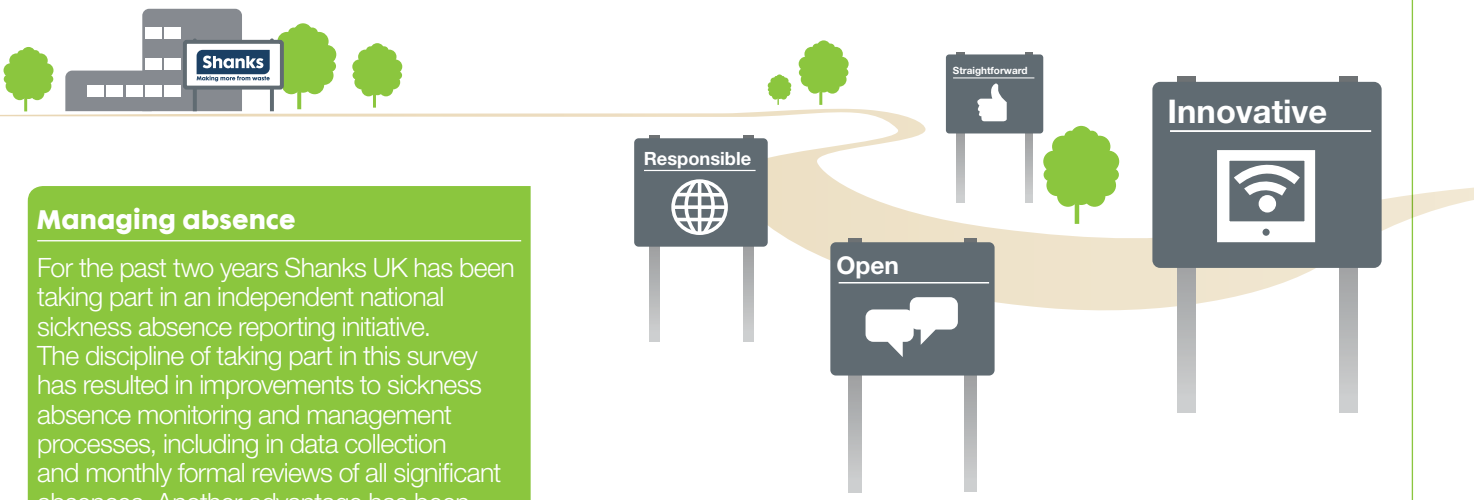
We monitor and report publicly on a wide range of people indicators, from male and female ratios and the age profile of our employees to training provision and employment status. For critical areas we seek improvement to the benefit of both employees and Shanks. Improvement can be shown through the statistics in this report. It can also be illustrated by initiatives, such as our recent introduction of a Group-wide confidential whistleblowing scheme which can be accessed by all of our employees.

Having the best people in place, who are well motivated, can work effectively in teams and show leadership is a critical business advantage.

Our values

We have a common set of values that represent what we are as a Group and they are:

- **Responsible** – we recognise our obligations to our fellow employees, the environment and the communities in which we operate and can be trusted to do the right thing
- **Innovative** – we aim to create an environment which encourages and supports an entrepreneurial spirit
- **Straightforward** – a 'no nonsense' approach means we do what we say we will do, empower our people to make decisions and are easy to do business with
- **Open** – a transparent approach means that we are able to maintain the highest professional and ethical standards and internally our open culture enables us to benefit from shared knowledge and experience



Managing absence

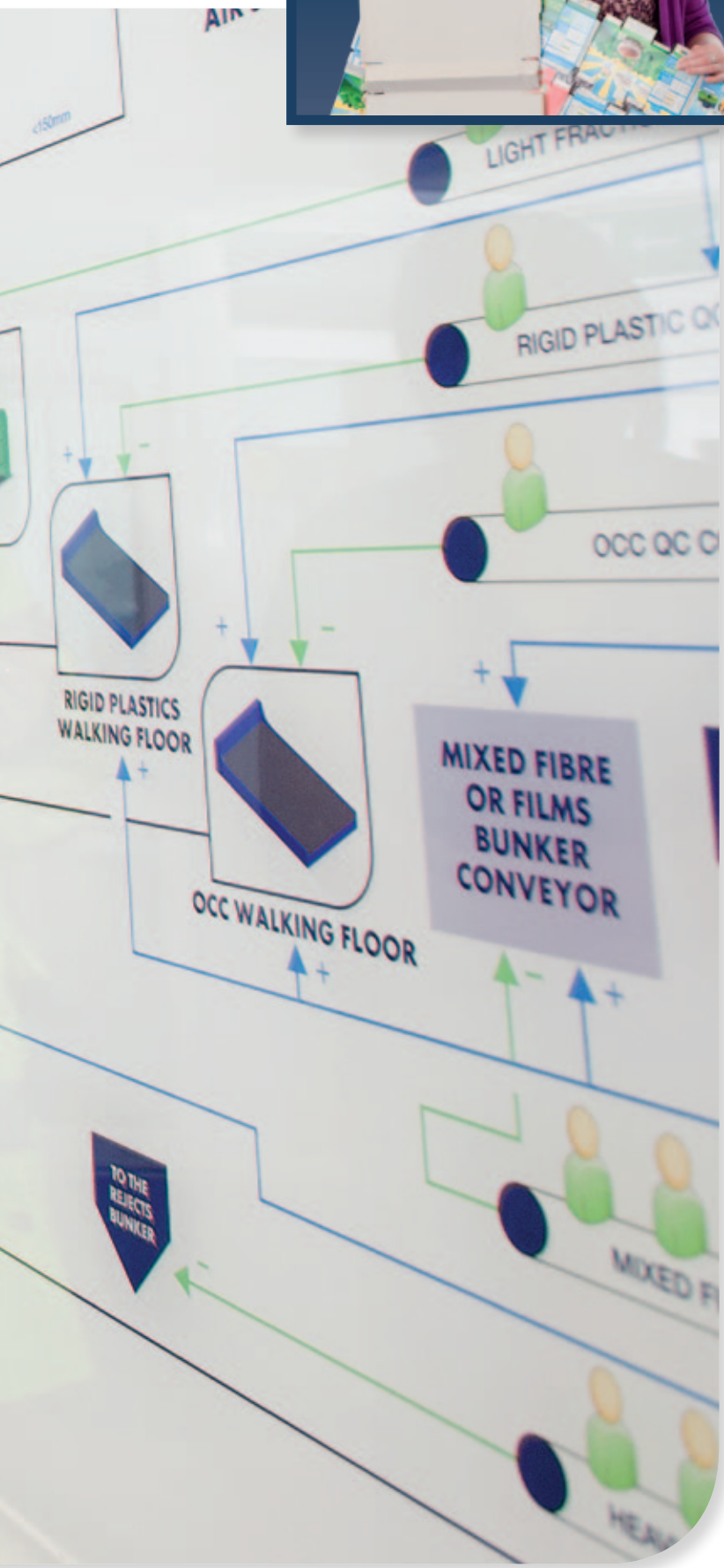
For the past two years Shanks UK has been taking part in an independent national sickness absence reporting initiative. The discipline of taking part in this survey has resulted in improvements to sickness absence monitoring and management processes, including in data collection and monthly formal reviews of all significant absences. Another advantage has been feedback on performance compared with other waste management organisations, which shows that Shanks UK has lower sickness absence rates than any of the other survey participants.

6

The wider community

"Most people understand that landfill is not an option anymore, but are unsure about what to replace it with. Shanks is all about sustainable waste management."

Abi Cox is Shanks Waste Education and Minimisation Officer for Shanks UK's Derbyshire operations. Abi has worked for Shanks for 18 months and is enjoying her role.



"The work I do allows us to give understandable and accurate information to community stakeholders and dispel any myths which may have grown-up about recycling and recovery. This communication is two-way. Not only can I give information out, I can also act as the link through which the community can make its feelings known to Shanks," Abi said when asked about the work she does.

"Many people do not know what happens to their waste once it has been collected and a large part of my role is educational, from giving talks at schools and training teachers to attending road shows and presenting to local groups. The youngest age group I give talks to are five-year-olds, and the oldest person who has attended one of my presentations was 102 years old."

Commenting on the value she brings to Shanks Abi said: "My entire job is about community relations and stakeholder engagement. Most people understand that landfill is not an option anymore, but are unsure about what to replace it with. Shanks is all about sustainable waste management and the more information on what this means we can provide to community stakeholders the better."

Day in the life: community officer

"There is no typical day for me, but it might start with loading the car with educational resource equipment and packs before arriving at a school for a series of lessons focusing on composting, an introduction to reducing, re-using and recycling wastes and 're-use in action', an interactive teaching session around re-using junk.

"Teacher training sessions, held at a local community centre and similar are also a key activity. Informing teachers about sustainable waste management allows them to pass the knowledge onto their classes and peers and is a key communications route. And of course, office work to arrange road shows and displays for future events. One of the most popular events we attend is, surprisingly, a food show: what to do with food waste is a question many people ask.

"Evening work is a given, such as presentations to local community groups. People are always interested in what happens to their waste. One evening a person attending a presentation brought along a bag of waste and asked me to describe what the best waste management route for each of the items in their bag would be – an unusual, but effective approach."

The wider community

The importance of community relations

Sustainable waste management provides benefits to society. However, while most people would accept and even applaud the good that sustainable waste management facilities produce, few would wish to live next door to one.

We conduct our activities under permits to operate. All of these are subject to public consultation and scrutiny. If we do not engage with the community we may find gaining new, or modifying existing, permits increasingly difficult. Without these permits we cannot operate. The communities neighbouring our sites are key stakeholders. Complaints received from local residents and enforcement actions taken by regulators relating to nuisance are critical performance measures for us.

How we seek to improve our community relations

Our approach to community relations is not simply reactive. We believe that there are benefits in proactive engagement with local residents. New and sustainable waste management technologies represent a change from the status-quo and may be viewed with caution. Proactive engagement to explain the sustainable benefits of new techniques and methods can address such concerns.

We believe our activities support society's move to a more sustainable future, but we cannot assume that local communities will always agree with us. Proactive engagement provides an insight into the views and concerns of communities near to our sites and allows us to change our activities to minimise any impact in advance. For example, our new Wakefield venture already have a liaison group in place including members of the local community, even before we have started any construction work on a new facility for the area.

How we performed

Complaints received from local residents about our sites fell by 32% in 2011/12. Beyond the bare statistics another indicator is how specific issues are approached, as illustrated by the case study in this report on our Roeselare facility. Ultimately, the performance measure which may have the greatest impact is fines and prosecutions by regulators stemming from nuisance and similar issues. We have received no such enforcement action in the past year.

Communities – complaints performance

Environmental complaints

Indicator	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Number of environmental complaints received[1]	**438**[2]	452	**45**[3]	260	**62**	93	**545**	805
Average number of complaints per site (out of total number of sites)	**10.0**	12.6	**2.2**	11.3	**1.6**	2.4	**5.4**	7.7

1 Includes all complaints, both those substantiated and those not substantiated
2 Includes 176 complaints against Shanks ATM site which are currently a matter of discussion with the local authorities
3 Significant reduction is the result of improved odour control measures at Shanks Roeselare site (see case study in this report)

Nature of environmental complaints

Nature of environmental complaints received	Netherlands		Belgium		UK	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Odour	**417**	433	**33**	253	**42**	67
Litter	**–**	–	**–**	–	**4**	3
Vermin	**–**	–	**–**	–	**8**	11
Traffic	**1**	–	**–**	–	**–**	–
Mud/Dust	**–**	2	**4**	6	**4**	10
Noise	**42**	16	**4**	1	**2**	–
Other	**32**	1	**4**	–	**2**	2
Total	**492**[1]	452	**45**	260	**62**	93

1 Total is higher than for total complaints table as some complaints involved complainants offering complaints on more than one issue at the same complaint event

Shanks Roeselare

As with many waste management facilities Shanks Roeselare in Belgium has the potential to cause odour nuisance for local residents. The site is well aware of this and has had odour control systems in place for many years. In 2011, following engagement between local stakeholders and the companies of the industrial area the site is located on, we embarked on a comprehensive upgrade of odour suppression and prevention measures. This included technical measures from improved thermal treatment of emissions to quick-close vehicle doors to buildings. In addition to these measures, employee communication on the importance of maintaining odour systems and processes was reinforced. To support this on-site work, we also put in place an external communication plan, created a point of contact for complaints and enhanced our proactive communications with local stakeholders. As a result complaints received have dropped to zero and the site's image has improved significantly.

7

Sustainable management

Management systems can be a dry topic. However, they are the glue which binds our vision to the formal disciplines of processes, audits and standards.

Why is management important to us?

Management systems can be a dry topic. However, they are the glue which binds our vision to the formal disciplines of processes, audits and standards. In addition, tenders for new waste management contracts are increasingly complex and those without the required accreditations may not be successful in gaining new business. Our successes in this area are an indication of the quality of our internal processes and systems.

How we seek to improve

We have in place formal management systems at all of our operations. These are aimed at maximising the quality of our resource recovery activities, ensuring good standards of health & safety, that employees are treated in an ethical manner and that issues relating to the wider community are reported on and addressed.

These management systems are internal to Shanks, but are audited against and approved to national and international standards. We seek continuously to improve our systems. Shanks Netherlands' work on the new Dutch Carbon Ladder scheme and Shanks UK's recent accreditation of all of its sites to the OHSAS 18001 international safety standard are just two examples of such improvement.

We also participate in high-profile benchmarking and assessment schemes. For example, the Group is included in the FTSE4Good index. We seek to engage proactively with such ratings bodies to ensure the specific issues facing waste management companies are included in their schemes. The carbon avoidance issue discussed in the environment and sustainability section of this report is one example of this ongoing stakeholder dialogue.

How we performed

We operate in a high risk sector with very real potential environmental and other impacts. We accept we are not perfect and when we fall below the standards required we believe this should be handled in a transparent and open manner and as the basis for producing improvement. For this reason we include a public record of any environmental, health & safety or other relevant prosecutions in this report.

As an example of positive performance, Shanks UK has recently been accredited to OHSAS 18001, the international safety standard, across all of its sites. This achievement falls outside of the 2011/12 year and will be reported on in full in our 2013 Corporate Responsibility Report.

FTSE4Good

Number of sites accredited to formal management systems standards

Indicator	Netherlands		Belgium		UK[1]		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
IS014001/EMAS	**35**	35	**9**	5	**35**	34	**79**	74
ISO 9001	**39**	39	**12**	14	**35**	34	**86**	87
OSHAS 18001	**19**	19	**0**	0	**0**[2]	0	**19**	19
SCC/VCA	**27**	27	**11**	8	**0**	0	**38**	35
Other	**27**	26	**2**	4	**0**	0	**29**	30

1 Figures for UK include certification for Shanks Dumfries and Galloway, for the project management of the Dumfries and Galloway Council waste management contract, which involves 11 sites and certification for Shanks Derbyshire and Cumbria, which involves a series of sub-contracted operations (all three only counted as one certification each)
2 Shanks UK gained company-wide (35 sites) accreditation to OHSAS 18001 in May 2012 – to be reported on in 2013 report

ISO14001/EMAS

ISO 9001

OSHAS 18001 & SCC/VCA

ISO14001/EMAS
International environmental management standards

ISO 9001
International quality standard

OHSAS 18001
International health & safety standard

SCC/VCA
National health & safety standards

Seagull control at Shanks Blochairn

Waste management facilities can be unpopular because of the potential nuisance they may pose to local residents, even if most people would accept that they perform an essential and valuable role. Seagulls may seem an unusual potential nuisance problem, but where these birds exist in high numbers they may be attracted to waste management sites to the annoyance of local residents. How do you control seagulls? At our Blochairn Recycling Plant in Glasgow the answer is to fly birds of prey. As a natural predator using birds of prey certainly gets any seagulls which may cause nuisance's attention, and is safer and more natural than other alternative methods.

8

Making more from waste: the full data

This is the reference section of our report. The following pages contain performance data for a wide variety of corporate responsibility indicators. For ease of reading we have split this data into the same basic sections as for the preceding pages of this report.

Carbon footprints

Avoiding carbon

Shanks Group

CO_2 equivalent ('000 tonnes)[1]	Group	
	2011/12	2010/11
Emissions from our activities		
Process based emissions		
Emissions from anaerobic digestion	**9**	3
Emissions from composting	**41**	39
Emissions from hazardous waste treatment	**287**	282
Emissions from landfill	**100**	140
Emissions from mechanical biological treatment (MBT)	**13**	12
Transport based emissions		
Fuel used by waste transport vehicles[2]	**80**	85
Energy use emissions		
Electricity used on sites and in offices	**48**	47
Gas used on sites and in offices	**9**	9
Fuel used on sites and in offices for plant and equipment/heating[3]	**23**	23
Total emissions from significant sources	**610**	640
The emissions we avoided for society by our activities		
Renewable energy generated	**36**	25
Waste derived fuels produced and sold	**652**	613
Materials separated for re-use/recycling (some re-used directly, others undergo re-processing by third parties)	**588**	586
Total potential avoided emissions	**1,276**	1,224[5]

1 Figures rounded to nearest 1,000 tonnes – totals may reflect rounding
2 Includes business travel for Shanks NL
3 Includes heat use on site for Shanks NL
4 For significant changes see individual country carbon footprint footnotes
5 See Shanks NL footprint for details of revisions to data based on the Netherlands Carbon Ladder scheme

Avoiding carbon

Shanks Netherlands[2]

CO_2 equivalent ('000 tonnes)[1]	Netherlands	
	2011/12	2010/11
Emissions from our activities		
Process based emissions		
Emissions from anaerobic digestion	**9**	3
Emissions from composting	**23**	21
Emissions from hazardous waste treatment	**287**	282
Emissions from landfill	**0.5**	0.5
Transport based emissions		
Fuel used by waste transport vehicles	**47**	45
Energy use emissions		
Emissions from anaerobic digestion	**29**	30
Emissions from composting	**9**	9
Emissions from hazardous waste treatment	**15**	14
Emissions from landfill	**0.5**	0.5
Fuel used on sites and in offices for plant and equipment/heating	**2**	2
Total emissions from significant sources	**422**	407
The emissions we avoided for society by our activities		
Renewable energy generated	**16**	5
Waste derived fuels produced and sold	**149**	140
Materials separated for re-use/recycling (some re-used directly, others undergo re-processing by third parties)	**295**	326
Total potential avoided emissions	**460**	471
Other on-site emissions avoided		
Energy from waste used on site as a fuel[3]	**246**	244
Total potential avoided emissions including energy from waste used on site	**706**	715

1 Figures rounded to nearest 1,000 tonnes – totals may reflect rounding
2 Shanks NL has certified its carbon footprint to level 3 of the CO_2 performance ladder of the Independent Foundation for Climate Friendly Procurement and Business (SKAO). Because the calculation method and conversion factors are different from those used in previous Shanks CR Reports a new carbon inventory was required. This has resulted in the following main data: 408,000 CO_2 emitted, of which the majority are process emissions and 714,000 of CO_2 avoided through the production of green electricity, fuels from waste and materials for recycling. The new factors used mean that the above data, both for 2010/11 and 2011/12, has been revised. Shanks Netherlands will use conversion factors that have been determined by the carbon performance ladder and these have been added to Shanks Group's definition table (available on Shanks website). See case study on page 15 of this report for further information
3 Waste used on site as a fuel has not been calculated or declared in previous reports, and is not quoted for Shanks BE or Shanks UK

Making more from waste: the full data

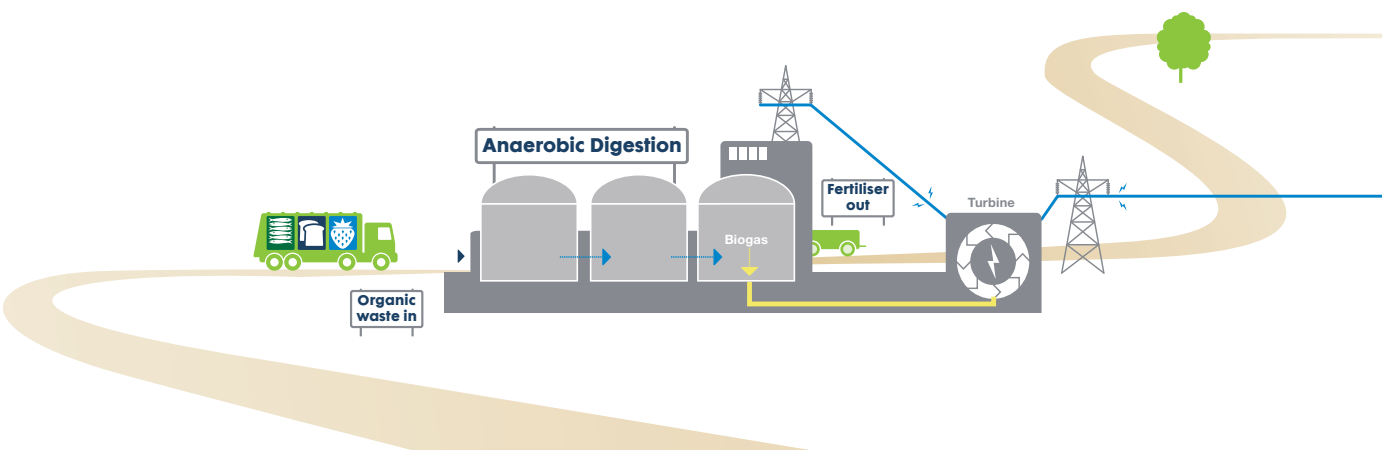
Carbon footprints

Avoiding carbon

Shanks Belgium

CO_2 equivalent ('000 tonnes)[1]	Belgium	
	2011/12	2010/11
Emissions from our activities		
Process based emissions		
Emissions from green waste composting	**14**	14
Emissions from landfill	**45**	55
Transport based emissions		
Fuel used by waste transport vehicles	**24**	28
Energy use emissions		
Electricity used on sites and in offices	**5**	4
Gas used on sites and in offices[2]	**–**	–
Fuel used on sites and in offices for plant and equipment/heating	**4**	5
Total emissions from significant sources	**92**	106
The emissions we avoided for society by our activities		
Renewable energy generated	**13**	15
Waste derived fuels produced and sold	**410**[3]	384
Materials separated for re-use/recycling (some re-used directly, others undergo re-processing by third parties)	**118**[4]	96
Total potential avoided emissions	**541**	495

1 Figures rounded to nearest 1,000 tonnes – totals may reflect rounding
2 Negligible gas consumption and thus emissions
3 Increase largely the result of increased waste derived fuel production
4 Increase largely the result of inclusion of further waste streams

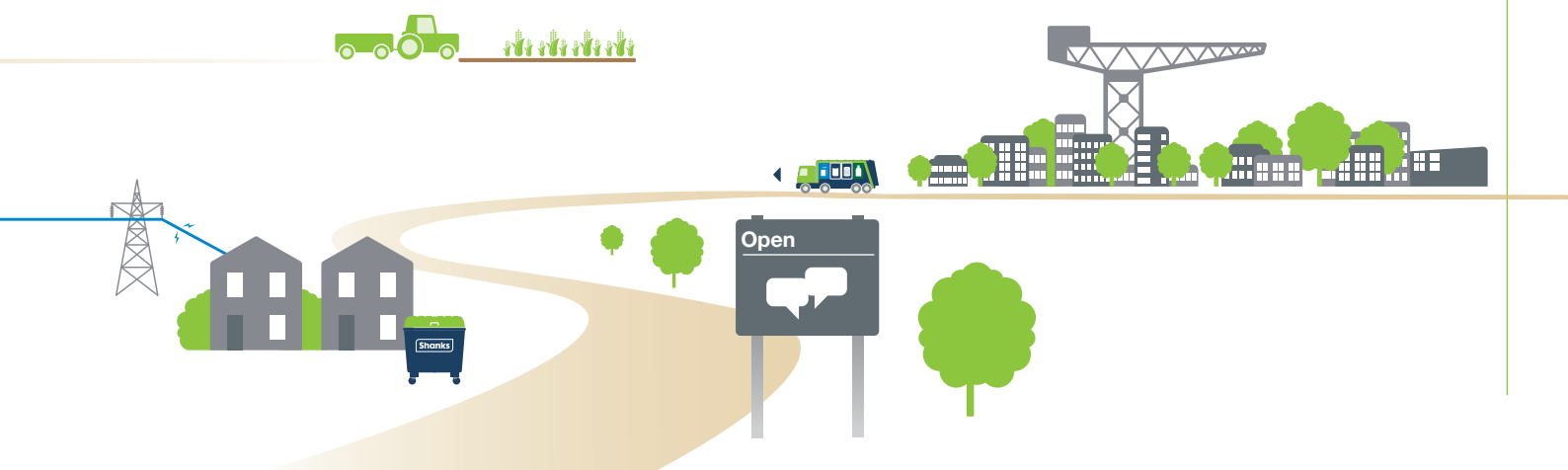


Avoiding carbon

Shanks UK

CO_2 equivalent ('000 tonnes)[1]	UK	
	2011/12	2010/11
Emissions from our activities		
Process based emissions[2]		
Emissions from in-vessel composting (mixed waste)	**4**	4
Emissions from landfill	**54**[5]	84
Emissions from mechanical biological treatment (MBT)	**13**	12
Transport based emissions		
Fuel used by waste transport vehicles	**7**[4]	10
Energy use emissions		
Electricity used on sites and in offices	**14**	13
Gas used on sites and in offices[3]	**–**	–
Fuel used on sites and in offices for plant and equipment/heating	**3**	3
Total emissions from significant sources	**95**	126
The emissions we avoided for society by our activities		
Renewable energy generated	**7**	5
Waste derived fuels produced and sold	**92**	89
Materials separated for re-use/recycling (some re-used directly, others undergo re-processing by third parties)	**175**	164
Total potential avoided emissions	**274**	258

1 Figures rounded to nearest 1,000 tonnes – totals may reflect rounding
2 Emissions include biogenic carbon
3 Gas is used at only six sites leading to zero figure with rounding
4 Decrease the result of divestment of vehicles operations, mainly in East London
5 Reduction is the result of enhanced gas flaring systems at landfill sites



Making more from waste: the full data

Recycling and recovery

Indicator	Netherlands[1]		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Total waste handled at Shanks sites (million tonnes)	**5.05**	4.88	**1.18**	1.24	**1.62**	1.55	**7.85**	7.66
Amount of materials recovered from the waste stream at Shanks sites (million tonnes)	**4.55**	4.23	**0.87**	0.92	**0.76**	0.66	**6.09**	5.87
Proportion of total waste handled recovered from the waste stream (%)[2]	**88**	88	**74**	74	**47**	43	**78**	77
Tonnes of waste handled at Shanks sites sent for landfill disposal (million tonnes)[3]	**0.14**	–	**0.15**	–	**0.79**	–	**1.08**	–
Tonnes of waste handled at Shanks sites sent for incineration disposal (million tonnes)[3]	**0.45**	–	**0.16**	–	**0.07**	–	**0.68**	–

1 Shanks Netherlands data includes waste handled and recycled/recovered by Shanks Canada
2 Includes water recovery and moisture loss during treatment for some technologies employed
3 Summing wastes sent to landfill and incineration will not always result in total as the result of rounding

Reducing society's footprint – waste types handled by Shanks sites

Waste type handled[1,2,3] ('000 tonnes)	Netherlands[4]	Belgium	UK	Group
Bulky waste	**89**	**–**	**28**	**118**
Construction and demolition	**407**	**142**	**220**	**572**
Commercial waste	**308**	**118**	**522**	**948**
Compost	**25**	**–**	**–**	**25**
Domestic waste	**82**	**80**	**886**	**1,048**
Food waste	**129**	**26**	**1**	**156**
Glass and ceramics	**39**	**0.8**	**13**	**53**
Green waste	**583**	**15**	**31**	**629**
Landfill	**0.7**	**–**	**–**	**0.7**
Liquid waste	**752**	**140**	**–**	**891**
Metals	**14**	**1**	**7**	**22**
Paper based	**86**	**67**	**37**	**189**
Plastics	**23**	**11**	**4**	**38**
Rockwool	**54**	**–**	**–**	**54**
Rubber	**7**	**6**	**0.02**	**13**
Rubble	**101**	**–**	**2**	**1,009**
Soil/sand/sludge	**1,203**	**146**	**58**	**1,407**
Special waste	**133**	**–**	**0.2**	**133**
SRF/RDF (waste derived fuels)	**1**	**–**	**–**	**1**
Wood	**107**	**168**	**14**	**289**
General waste	**–**	**257**	**–**	**257**
Totals	**5,051**	**1,177**	**1,624**	**7,852**

1 Figures are 1,000 tonnes, may reflect rounding and may not total
2 Data is for wastes received at Shanks sites (handled) and does not include wastes collected and transported to third party site
3 Data is based on Shanks new Qlikview management information system which was rolled-out across Shanks Group in 2011/12. As a new system, data quality may improve over time
4 Includes water recovery and moisture loss during treatment for some technologies employed

Wider environmental indicators

Emissions[12]

	Netherlands		Belgium		UK		Group	
	2012	2011	**2012**	2011	**2012**	2011	**2012**	2011
Amount of greenhouse gases emitted from key operations (CO_2 equivalent '000 tonnes)[2]	**423**	480	**93**	106	**95**[9]	126	**610**	712
Nitrogen oxides (NO_x/NO_2) emitted to air (tonnes)[1,3]	**–**	–	**–**	–	**–**	–	**329**[4]	–
Sulphur oxides (SO_x/SO_2) emitted to air (tonnes)[1,3]	**–**	–	**–**	–	**–**	–	**35**[4]	–
Metals (Cd, Cr, Cu, Hg and Pb) emitted to water (tonnes)[1,3,5]	**–**	–	**–**	–	**–**	–	**0.095**[4]	–
Reported spills at sites (number)[11]	**22**[8]	–	**–**	–	**1**[6]	–	**23**	–
Sites with land in or next to protected or high biodiversity value areas[1]	**1**[7]	–	**1**[10]	–	**–**	–	**2**	–

1 Data not reported in 2011 report
2 Data rounded to nearest 1,000 tonnes
3 Group total figure only given. Data is from Shanks sites which fall under EPRT (European Pollution Release and Transfer) requirements where required by environmental permit. See Shanks wider environmental indicators EPRT emissions document on Shanks Group website for details
4 Data from 2010 EPRT returns
5 Metals expressed as total of cadmium and compounds (Cd), chromium and compounds (Cr), copper and compounds (Cu), mercury and compounds (Hg) and lead and compounds (Pb)
6 In December 2011 one of Shanks civic amenity sites in Dumfries and Galloway flooded as the result of extreme weather. This flood overturned the site diesel tank which split. Remediation and clean-up work was completed to the satisfaction of the regulator
7 Area of protected land near to Shanks ATM site (115,000m^2 in extent)
8 All reportable spills occurred at Shanks ATM site and are a function of site permit reporting requirements
9 Reduction largely the result of enhanced gas flaring systems at landfill sites
10 Area of high biodiversity as part of Shanks Monceau site which is managed in accordance with legal obligation (5,000m^2 extent)
11 Spill reporting requirements in law and in permits varies from country to country and from site to site
12 Data is for calendar year for regulatory reporting reasons

Resources and wastes

Indicator	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Electricity consumption at sites and offices ('000 Kilowatt hours)	**94,988**	84,942[5]	**17,456**	15,773	**25,608**	24,869	**138,052**	125,584
Gas used at sites and offices (cubic metres)	**5,033,000**	5,182,000[5]	**969**	1,399	**40,265**	33,051	**5.074,234**	5,216,450
Fuel use at sites and offices ('000 litres)[2]	**4,787**	4,520[5]	**1,650**	1,750	**1,175**	1,072	**7,612**	7,342
Fuel used in waste collection and transport vehicles ('000 litres)[2]	**15,044**	14,233[5]	**9,169**	10,327	**2,681**	3,863	**26,894**	28,423
Total electricity generated (megawatt hours)	**38,789**[7]	18,091	**62,227**	68,574	**12,136**[8]	9,858	**113,152**	96,523
Water used at sites – potable water ('000 m^3)[3]	**307**	224	**26**[6]	112	**45**[4]	38	**378**	374
Water used at sites – surface water ('000 m^3)[1,3]	**4,909**	–	**5**	–	**–**	–	**4,914**	–
Water used at sites – groundwater ('000 m^3)[1,3]	**16**	–	**42**	–	**–**	–	**58**	–
Water used at sites – rain water ('000 m^3)[1,3]	**20**	–	**39**	–	**0.5**	–	**59.5**	–
Water used at sites – grey water ('000 m^3)[1,3]	**713**	–	**77**	–	**–**	–	**790**	–

1 Data not declared separately in 2011 report
2 Diesel fuel used (for site use mainly in heavy mobile or static plant)
3 Data rounded to nearest 1,000 m^3
4 Increase the result of new sites being brought on line and likely increased use for dust suppression
5 Data recalculated in line with Netherlands Carbon Ladder scheme. Group total data for these measures likewise restated for 2010/11
6 Reduction the result of all water use being reported as potable in previous years – now split between different categories as shown
7 Increase the result of new installed generation capacity such as at Shanks NL's Amsterdam AD Plant
8 Increase the result of new generating capacity being brought on line

Making more from waste: the full data

Employee wellbeing

Health & safety

Accident performance[1]

	2011/12					2010/11				
	LTA	LTA rate	RIDDOR	RIDDOR rate	Fatal accidents	LTA	LTA rate	RIDDOR	RIDDOR rate	Fatal accidents
Netherlands	**15**	**650**	**36**	**1,600**	**–**	11	500	36	1,700	–
Belgium	**4**	**365**	**56**	**5,100**	**1**	6	500	70	6,100	–
UK	**7**	**800**	**19**	**2,100**	**–**	15	1,600	21	2,200	–
Group	**26**	**600**	**111**	**2,600**	**1**	32	800	129	3,000	–

Synopsis of RIDDOR accident performance

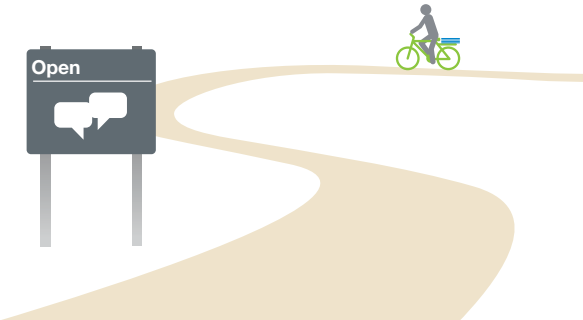
	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	2011/12	2010/11	2011/12	2010/11	2011/12	2010/11
RIDDOR number	**36**	36	**56**	70	**19**	21	**111**	129
RIDDOR rate	**1,600**	1,700	**5,100**	6,100	**2,100**	2,200	**2,600**	3,000
Change %	**–6%**		**–16%**[1]		**–5%**		**–13%**[1]	

1 Following the publication of our 2011 CR Report the RIDDOR accident data for Shanks Belgium was revised as the result of further investigations into accidents which occurred late in the year. For consistency the data above for 2011 is as reported in our 2011 CR Report. However, if the revised Belgium data is used the level of improvement shown by Shanks Belgium increases to 22% and the Group improvement, as a result, increases to 16%

Employee absence

Indicator	Netherlands		Belgium		UK	
	2011/12	2010/11	2011/12	2010/11	2011/12	2010/11
Total employee absenteeism from work (% of available days)	**5.0**	5.2	**6.1**	7.8	**4.2**	3.8
Work related absenteeism from work (% of available days)	**0.5**	0.3	**1.0**	0.7	**0.2**	0.4
Non-work related absenteeism from work (% available days)	**4.4**	4.9	**5.1**	7.1	**4.0**	3.4
Average duration of employee absence (days)	**15**	13	**20**	12	**11**	9
Average frequency of absence (number of absence periods)	**1.1**	1.1	**1.1**	1.3	**1.0**	1.0
Employees with more than two absence periods (% of workforce)	**14**	11	**13**	16	**12**	12
Employees with zero absence days (% of workforce)	**42**	41	**42**	37	**53**	55

1 Data as percentages may not sum to totals as a result of rounding



Long-term RIDDOR accident performance

Long-term RIDDOR accident performance – Shanks Group

Long-term RIDDOR accident performance – Shanks Belgium

Long-term RIDDOR accident performance – Shanks Netherlands

Long-term RIDDOR accident performance – Shanks UK

In all of the health and safety tables and graphs the accident categories used are:

RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) – RIDDOR is UK law requiring employers to report more serious accidents, such as an injury which prevents an employee from performing their normal duties for more than three days. Shanks requires its operating companies to report as if under RIDDOR to ensure consistency and to allow comparisons to be made.

LTA (lost time accident) injury – any injury suffered by an employee which results in at least one day off work, but which is not serious enough to fall under RIDDOR. As for RIDDOR, Shanks requires its operating companies to report LTAs. Using both RIDDOR and LTA data Shanks can gain a more complete and consistent measure of its performance and account for differences in country practice on reporting.

Fatal accidents – fatal workplace accidents.

Accident rates – total accident figures do not allow adequate comparisons to be made over time as employee numbers can, and do, change. The accident rates quoted are per 100,000 employees. These rate figures are a truer measure of accident performance.

Making more from waste: the full data

Employee wellbeing

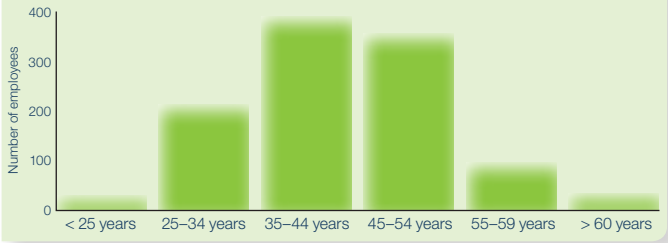
Employee retention and training

Indicator	Netherlands[1]		Belgium		UK[3]		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Total number of permanent employees[2]	**2,072**	2,086	**1,118**	1,146	**854**	795	**4,044**	4,027
Number of operational site employees	**1,598**	1,622	**884**	842	**509**	506	**2,991**	2,970
Number of administration, support, etc. employees	**474**	464	**234**	304	**345**	289	**1,053**	1,057
Number of male permanent employees	**1,836**	1,850	**983**	1,012	**708**	656	**3,527**	3,518
Number of female permanent employees	**236**	234	**135**	134	**146**	139	**517**	509
Number of full-time permanent employees	**1,847**	1,898	**1,059**	1,077	**839**	780	**3,745**	3,755
Number of part-time permanent employees	**224**	188	**59**	69	**15**	15	**298**	272
Permanent employee turnover (% replacement over the year)	**5**	7	**8**	13	**19**[6]	16	**–**	–
Average number of years service for employees	**7**	9	**9**	8	**6**	7	**7**	8
Number of training days per permanent employee	**2.3**	2.0	**2.8**	1.8	**2.8**	3.0	**2.6**	2.1
Number of temporary employees (expressed as full time equivalents)[4]	**236**	–	**86**	–	**237**	–	**559**	–
Number of cases of discrimination against employees[4,5]	**–**	–	**–**	–	**1**[7]	–	**1**	–
% of employees covered by formal joint management/worker safety consultation committees[4]	**70**	–	**100**	–	**85**	–	**85**	–

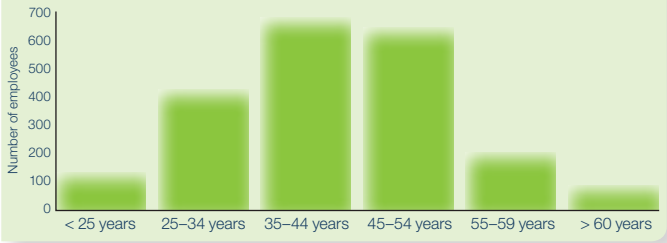
1 Netherlands data does not include Shanks Canada statistics (Group totals likewise do not include Canada)
2 Total employee number data may vary from that given in the key facts and figures table as a result of the calculation methods used being more relevant to split data provided
3 UK data includes Group Central Services
4 Data not reported in 2011 report
5 Confirmed cases only
6 Rise in employee turn-over affected by new sites being brought on line and temporary workers being employed as permanent
7 One case of racial discrimination. Following investigation, the employee involved was dismissed

Age profiles

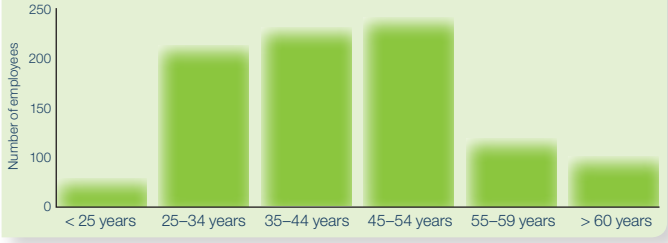
Age profile by number of employees – Shanks Belgium



Age profile by number of employees – Shanks Netherlands



Age profile by number of employees – Shanks UK



Communities

Complaints performance

Environmental complaints

Indicator	Netherlands		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Number of environmental complaints received[1]	**438**[2]	452	**45**[3]	260	**62**	93	**545**	805
Average number of complaints per site (out of total number of sites)	**10.0**	12.6	**2.2**	11.3	**1.6**	2.4	**5.4**	7.7

1 Includes all complaints, both those substantiated and those not substantiated
2 Includes 176 complaints against Shanks ATM site which are currently a matter of discussion with the local authorities
3 Significant reduction largely the result of improved odour control measures at Shanks' Roeselare

Nature of environmental complaints

Nature of environmental complaints received	Netherlands		Belgium		UK	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Odour	**417**	433	**33**	253	**42**	67
Litter	**–**	–	**–**	–	**4**	3
Vermin	**–**	–	**–**	–	**8**	11
Traffic	**1**	–	**–**	–	**–**	–
Mud/Dust	**–**	2	**4**	6	**4**	10
Noise	**42**	16	**4**	1	**2**	–
Other	**32**	1	**4**	–	**2**	2
Total	**492**[1]	452	**45**	260	**62**	93

1 Total is higher than for total complaints table as some complaints involved complainants offering complaints on more than one issue at the same complaint event

Making more from waste: the full data

Managing responsibly

Management systems

Number of sites accredited to formal management systems standards

Indicator	Netherlands		Belgium		UK[1]		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
ISO 14001/EMAS	**35**	35	**9**	5	**35**	34	**79**	74
ISO 9001	**39**	39	**12**	14	**35**	34	**86**	87
OSHAS 18001	**19**	19	**–**	–	**–**[2]	–	**19**	19
SCC/VCA	**27**	27	**11**	8	**–**	–	**38**	35
Other	**27**	26	**2**	4	**–**	–	**29**	30

1 Figures for UK include certification for Shanks Dumfries and Galloway, for the project management of the Dumfries and Galloway Council waste management contract, which involves 11 sites and certification for Shanks Derbyshire and Cumbria, which involves a series of sub-contracted operations (all three only counted as one certification each)
2 Shanks UK gained Company-wide (35 sites) accreditation to OHSAS 18001 in May 2012 (to be reported on in 2013 report)

ISO 14001/EMAS – international environmental management standards
ISO 9001 – international quality standard
OHSAS 18001 – international health and safety standard
SCC/VCA – national health and safety standards

Compliance

Compliance performance

Indicator	Netherlands[2]		Belgium		UK		Group	
	2011/12	2010/11	**2011/12**	2010/11	**2011/12**	2010/11	**2011/12**	2010/11
Number of environmental convictions and fines[1]	**–**	–	**2**	–	**–**	–	**2**	–
Number of health and safety convictions and fines	**4**	2	**–**	–	**–**	–	**4**	2
Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	**–**	–	**–**	–	**–**	–	**–**	–
Number of operations which have undergone risk assessment for bribery and other similar risks to identify higher-risk areas	**42**	41	**20**	23	**39**	39	**101**[2]	103
Percentage of operations which have undergone risk assessment for bribery and other similar risks to identify higher-risk areas	**100**	100	**100**	100	**100**	100	**100**	100

1 Data is for convictions (cases where the Company goes to court) and significant administrative fines (such as those that can be received in Belgium and the Netherlands)
2 Does not include Shanks Canada

Details of convictions or fines

Operation	Date	Penalty	Details
Stoel groep, Shanks NL	August 2011	€8,100	Permanent damage to employee's arm that became trapped while removing waste during the operation of a skip lorry.
Smink, Shanks NL	October 2011	€10,800	Permanent damage to employee's finger while attempting to move a lift 'eye' on a container into the correct position.
ICOVA, Shanks NL	June 2011	€8,100	Operator hit by blowtorch while addressing a machine failure. No permanent damage sustained.
ATM, Shanks NL	November 2011	€10,800	During inspection of ground-cooler a dust/steam explosion took place. Victim received second and third degree burns.
Shanks Vlaanderen BE	October 2011	€4,440	Breach of site permit and Flemish waste regulations.
Villerot, part of Shanks Hainaut BE	November 2011	€500 (payment deferred dependent on future environmental management of site)	Waste water discharge breach relating to fire water (used during a fire on wastes stored on site).

9

Co-ordinating and driving corporate responsibility

Shanks Group CR Committee

How do you set a realistic but challenging carbon avoidance target? If you have set yourself a recycling and recovery target, how do you monitor performance across multiple countries and technologies to achieve meaningful data? How do you keep informed about your stakeholders' developing CR needs?

Responsibility for delivering sustainable performance must always rest at an operational level. But, answers to questions such as those left are issues for the management and co-ordination of corporate responsibility. Shanks Group CR Committee and dedicated Group Health & Safety Committee are our core, high-level groups aimed at management and co-ordination of sustainable practices. Reporting directly into and given leadership by Shanks Group's Executive Committee these committees are staffed with senior specialists from across the Group, selected on the basis of their experience and knowledge.

The functions of these committees include providing high-level advice to the Group on CR and associated issues, performance monitoring and reporting, policy formulation, communications and providing independent commentary on Shanks CR standards.

How these groups deliver can be illustrated by example. Following a serious workplace accident at one of our sites during 2011 it was imperative that information on the incident was communicated across the Group. In addition, that each individual site took a series of preventative measures to reduce the risk of a recurrence. Our Group Health & Safety Committee took up the challenge. Its members communicated to all 100 plus of our facilities, ensured that actions were taken at each and every site and co-ordinated responses to ensure the quality of actions. Our CR and Health & Safety Committees are set-up and empowered to drive such actions.

Group Health & Safety Committee

Martine Pottier, one of the members of our Group Health & Safety Committee, at work.

Our Corporate Responsibility and Sustainability Reporting framework

Health & safety in practice

Fire fighting practice at Shanks ATM, Netherlands.

Co-ordinating and driving corporate responsibility

Our CR policy and embedding CR values

Our CR policy describes our approach to corporate responsibility. It includes roles and responsibilities and provides the standards and values we expect all our operations to follow and embed. It is our key CR document. We urge readers to access this policy which is available on our Group website.

Senior executive commitment in action

Our Group Executive Committee visiting our Roeselare site to see personally the improvements made to odour control systems.

However, a policy is just that – a policy written on paper. Embedding CR values into day-to-day business is a more difficult task. At Shanks we have a determined and consistent approach to ensuring our policies are implemented on the ground. How to do this effectively varies dependent on policy, its audience, existing values which may already be in place and other factors.

In late 2010 we initiated a safety campaign through the direct leadership of our Company directors. To support this campaign we provided dedicated training in safety leadership for all directors. This included processes they should follow to conduct safety leadership visits to our sites and clear safety standards which they should concentrate on. We also made employee engagement a mandatory part of visits and publicised the campaign via our newsletters and other communications routes.

To ensure that the initiative was sustained we set performance targets – each director was given the objective of conducting eight safety leadership visits a year. Reports produced by directors based on their leadership visits are collated by our senior safety professionals and reported on centrally. Director performance against their target is now part of our routine reporting to our Group Board.

As a result more than 100 director safety leadership site visits have taken place across Shanks in the past year. Employee feedback is that they appreciate these visits and the time directors take to engage with them on a one-to-one basis. The profile of safety has risen because all employees can see clearly the importance those at the top of our Group give to it.

Stakeholder engagement

Shanks engages with a wide variety of stakeholders. The dialogue they want and information they require from us varies. The communication routes they prefer differ and the level, frequency, complexity and nature of the engagement can also be specific.

Our Group CR Committee has identified our main stakeholders for corporate responsibility issues and we engage with them through a variety of different routes. This includes local liaison groups aimed at communities neighbouring our sites, employee opinion surveys, web-based communication, routine customer satisfaction assessments and programmed meetings with regulators.

To be of greatest value this engagement must be two-way. In this report dialogue with corporate responsibility rating organisations on carbon avoidance and emissions has been mentioned. For emissions this engagement has resulted in further information on our emissions being made public. In the example of carbon avoidance some of the agencies we have contact with are now considering giving greater emphasis to this in their carbon foot-printing.

Our Group CR Committee is currently conducting a complete review of our CR stakeholder engagement. The results of this review will be reported on in our 2013 Corporate Responsibility Report. Stakeholder engagement is not static and we need to be able to continuously monitor and adapt to our stakeholder needs through exercises such as this review.

Engaging with shareholders

The community is a critical stakeholder group for us and direct, proactive engagement is crucial.

Co-ordinating and driving corporate responsibility

Audiences, scope of report and further reading

We have reported on our environmental and health & safety performance since the late 1980s. This Group Corporate Responsibility Report is Shanks Group plc's fourth full annual CR publication and covers all of our operations.

This report is published each year concurrent with our Annual Report and Accounts. The basis for the data in this report is covered in detail in our 'indicators document' which is available on our Group website. This document also includes information on audiences for this report.

Also available on our website are two other documents which may be of interest to readers. These are our wider environmental indicators document, covering emissions, and our GRI navigator document, as below.

This report has been produced using the guidelines laid down in the Global Reporting Initiative (GRI) level B. However, to ensure this report's accessibility and to avoid duplicating information already available in other Shanks' documents some of the general requirements of GRI may be found in other publications. On our Group website is a 'GRI navigator document' which takes the requirements of GRI and lists where these are covered in both this report and our other publications and information sources.

Who to contact with queries and feedback

Contacts

Further information about our activities, previous years' CR reports and other Shanks' publications can be obtained from our Group website at www.shanksplc.com or for Shanks' operating divisions direct from www.shanks.nl (Shanks Netherlands) www.shanks.be (Shanks Belgium) and www.shanks.co.uk. (Shanks UK). Or, contact us at the below address.

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