

# Management Approach Disclosures

The table below summarises the Group's approach to managing material topics (GRI 103-2) and evaluating the effectiveness of its approach (GRI 103-3). It also provides a list of the GRI indicators linked to each of the material topics disclosed in the Report.

No.	Material topic	Management approach and its components	Evaluation of the management approach	GRI disclosures in the report
<b>CORPORATE GOVERNANCE</b>				
1	<b>Corporate governance</b> <i>For more information about this topic, see the <a href="#">Corporate Governance</a> section, as well as <a href="#">Metinvest's 2020 annual report</a></i>	<p>Metinvest B.V.'s corporate governance structure comprises the General Meeting of Shareholders, Supervisory Board and Management Board. The Executive Team supports the operation of the corporate governance bodies at the Group level.</p> <p>The Group ensures the efficiency of its vertically integrated structure and business model guided by the core principles of management: specialisation, vertical integration, unified strategic management, centralisation, growth and investments, global best practice, tradition and innovation, commitment to leadership and personal commitment</p>	<p>The Supervisory Board annually sets team goals for senior management, as well as personal goals for the CEO.</p> <p>The CEO allocates them to each member of the Executive Team in accordance with their job functions, subject to approval of the Supervisory Board.</p> <p>These goals are incorporated into a KPI scorecard, where each target is weighted based on a manager's ability to influence its achievement.</p> <p>After each year-end, the Supervisory Board conducts an annual performance appraisal for members of the senior management based on their self-assessment</p>	<p>102-18 Governance structure</p> <p>102-19 Delegating authority</p> <p>102-20 Executive-level responsibility for economic, environmental and social topics</p> <p>102-21 Consulting stakeholders on economic, environmental and social topics</p> <p>102-22 Composition of the highest governance body and its committees</p> <p>102-24 Nominating and selecting the highest governance body</p> <p>102-25 Conflicts of interest</p> <p>102-26 Role of highest governance body in setting purpose, values and strategy</p> <p>102-27 Collective knowledge of highest governance body</p> <p>102-28 Evaluating the highest governance body's performance</p> <p>102-29 Role of highest corporate governance body in identifying and managing economic, environmental and social impacts</p> <p>102-30 Effectiveness of risk management processes</p>

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2	<b>Anti-corruption</b> <i>For more information about this topic, see the <a href="#">Sustainable Development</a> section</i>	<p>The Ethics Committee operates at the level of the Executive Team and meets on a quarterly basis. The agenda of its meetings includes assessing the preventive measures for unethical behaviour and corruption and taking decisions concerning the appropriate measures to implement should a violation of the principles of the Code of Ethics or other ethical norms be confirmed.</p> <p>Each asset of the Group has a legal function responsible for identifying, analysing and assessing risks associated with corruption, bribery and fraud, as well as for reporting critical concerns to the Group's Compliance Officer for resolution.</p> <p>The Code of Ethics contains anti-corruption and anti-bribery provisions that apply to all employees of Metinvest.</p> <p>The Group compiles and regularly reviews a list of positions with a high risk of exposure to corruption and fraud. As part of the appointment process to general director positions, all candidates, both internal and external, undergo a mandatory screening. Metinvest conducts supplier anti-corruption screenings and risk assessments of business operations involving government authorities</p>	<p>The Group regularly conducts inspections and audits at its assets to analyse the potential corruption and bribery risks. The results obtained are used to take decisions about revising policies and standards, and to improve risk assessment procedures</p>	<p>102-17 Mechanisms for advice and concerns about ethics</p> <p>205-1 Operations assessed for risks related to corruption</p> <p>205-2 Communication and training about anticorruption policies and procedures</p> <p>205-3 Confirmed incidents of corruption and actions taken</p>

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3	<p><b>Ethics and compliance</b></p> <p><i>For more information about this topic, see the <a href="#">Sustainable Development section</a></i></p>	<p>The Group's Compliance Programme encompasses all assets and covers the issuance of compliance policies, staff training, compliance risk assessments and compliance reporting.</p> <p>The Ethics Committee at the Group's Executive Team level oversees the adherence to the Compliance Programme, analyses the implementation of the Compliance Programme and the potential compliance risk areas, takes decisions concerning conflicts of interest and reviews reports on the violation of ethical standards received via the Trust Line.</p> <p>The Ethics Committee is chaired by Group's CEO and is composed of the Executive Team. At the asset level, the compliance coordinators, who report to the Group's Compliance Officer, manage the implementation of the Compliance Programme. The legal team is tasked with monitoring conflicts of interest and assessing the materiality of each conflict.</p> <p>The Group's Code of Ethics sets forth its core ethical and business standards, which are applied to all Metinvest employees in their daily work. Various trainings and communication campaigns are regularly held to promote employee awareness on all the necessary business ethics provisions and standards.</p> <p>The ethical standards are integrated into supplier selection procedures.</p> <p>The Group has a Procedure for Declaring Conflicts of Interest and a Procedure on Anti-Money Laundering and Countering the Financing of Terrorism</p>	<p>The Compliance Programme provides a set of annual targets that are monitored by compliance coordinators at the asset level and by the Supervisory Board at the Group level.</p> <p>Implementation status of the Compliance Programme is reported quarterly at meetings of the Supervisory Board's Audit and Finance Committee. The Supervisory Board approves the Compliance Programme targets for the upcoming annual cycle</p>	<p>102-16 Values, principles, standards and norms of behaviour</p> <p>102-17 Mechanisms for advice and concerns about ethics</p> <p>102-25 Conflicts of interest</p> <p>206-1 Legal actions for anti-competitive behaviour, antitrust and monopoly practices</p> <p>406-1 Incidents of discrimination and corrective actions taken</p> <p>407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk</p> <p>408-1 Operations and suppliers at significant risk for incidents of child labour</p> <p>409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour</p>

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4	<b>Business transparency and openness</b> <i>For more information about this topic, see the <a href="#">Sustainable Development</a> section, as well as <a href="#">Metinvest's 2020 annual report</a></i>	<p>Metinvest regularly publishes reports on financial and non-financial performance at its corporate website.</p> <p>The Sustainable Development and People Management directorate is responsible for maintaining long-term relations with various stakeholder groups, including employees, local communities, media and government authorities. The Corporate Finance department deals with financial capital providers, government relations managers deal with government authorities, while the Sales directorate is responsible for customer relations. The Logistics and Procurement directorate engages with suppliers.</p> <p>The Group uses the Trust Line to receive feedback from all stakeholders, internal and external</p>	<p>The Internal Audit directorate ensures the reliability of non-financial indicators presented in the sustainability report.</p> <p>Metinvest's financial statements undergo third-party audit (for the latest independent auditor statement, see p. 79 of <a href="#">Metinvest's 2020 annual report</a>)</p>	All GRI indicators disclosed in the report
<b>SOCIAL</b>				
5	<b>Human rights</b> <i>For more information about this topic, see the <a href="#">Employees</a> section</i>	<p>The relationships between Metinvest and its employees are based on the principles of the International Labour Organisation (ILO) and legal norms.</p> <p>The Group's Code of Ethics is based on the principles of respect for human rights and equal opportunity employment for all workers without exception or discrimination based on their nationality, race, sex, age or religious beliefs. The Code of Ethics also enshrines employee rights to decent labour, health and safety conditions. The Group uses the confidential Trust Line maintained by SCM to report incidents of unethical behaviour and human rights violations.</p> <p>The Ethics Committee at the Executive Team level reviews all critical concerns related to breaches of ethical conduct, including human rights violations</p>	<p>Compliance with the Code of Ethics and its human rights provisions is monitored through a set of internal metrics, including the share of employees familiarised with the Code of Ethics and the number of complaints received via the Trust Line that were confirmed.</p> <p>Human rights issues are considered when evaluating the implementation status of the Compliance Programme</p>	<p>102-16 Values, principles, standards and norms of behaviour</p> <p>102-17 Mechanisms for advice and concerns about ethics</p> <p>405-1 Diversity of governance bodies and employees</p> <p>406-1 Incidents of discrimination and corrective actions taken</p> <p>410-1 Security personnel trained in human rights policies or procedures</p> <p>412-1 Operations that have been subject to human rights reviews or impact assessments</p> <p>412-2 Employee training on human rights policies or procedures</p> <p>412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening</p>

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6	<p><b>Occupational health and safety (OHS)</b></p> <p><i>For more information about this topic, see the <a href="#">Health and Safety</a> section</i></p>	<p>Health and safety issues are considered at all organisational levels. The Supervisory Board's Health, Safety and Environmental Committee oversees compliance with international standards and requirements at the level of general directors of Group assets, reviews the results of investigations of potentially dangerous incidents, and promotes initiatives and programmes to reduce the risk of such incidents.</p> <p>The Occupational Health and Safety department within the Sustainable Development and People Management directorate coordinates the implementation of health and safety programmes at the Group level. The Occupational Health and Safety department oversees compliance with the safety rules and introduces necessary measures at each asset.</p> <p>The Group has in place a Policy and Principles in the Field of Health, Safety and the Environment, as well as 15 corporate OHS standards, which reflect Metinvest's comprehensive approach to ensure workplace safety</p>	<p>In 2020, we continued to certify the compliance of the management system at our assets with ISO 45001, which has replaced OHSAS 18001 as the leading international occupational health and safety standard. By the end of the reporting period, ten of Metinvest's assets passed the ISO 45001 certification audits.</p> <p>The Group's assets regularly evaluate the OHS risks related to various aspects of their activities. In this, we are guided by recognised international standards, including the hazard identification (HAZID), environmental impact identification (ENVID), hazard and operability study (HAZOP), work safety analysis, lock out, tag out (LOTO), permit-to-work and job safety analysis (JSA) methods. The Group conducts internal audits to evaluate the compliance of its assets with OHS standards and regulatory requirements</p>	<p>403-1 Occupational health and safety management system</p> <p>403-2 Hazard identification, risk assessment and incident investigation</p> <p>403-3 Occupational health services</p> <p>403-4 Worker participation, consultation and communication on occupational health and safety</p> <p>403-5 Worker training on occupational health and safety</p> <p>403-6 Promotion of worker health</p> <p>403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p> <p>403-8 Workers covered by an occupational health and safety management system</p> <p>403-9 Work-related injuries</p> <p>403-10 Work-related ill health</p>

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7	<b>Training and education</b> <i>For more information about this topic, see the <a href="#">Employees</a> section</i>	<p>The Sustainable Development and People Management directorate designs learning programmes, delivers training sessions for employees and manages partnerships with external educational institutions. The Corporate University and the assets' training centres are the foundations of Metinvest's training and development system. The Group offers a range of compulsory and optional educational programs tailored to the needs of specific functions and different levels with a focus on the development of professional skills and personal qualities.</p> <p>In 2020, the Group established Metinvest Polytechnic, Ukraine's first private university dedicated to the steel and mining industry</p>	<p>The implementation of the human capital management strategy is reviewed annually and the results are considered for the following annual period planning.</p> <p>Metinvest updated the personnel training and development strategy by synchronising it with the annual evaluation system and Talent Pool system. It also strengthened the personnel evaluation system.</p> <p>The Group is also focusing on improving the quality of training at the assets' training centres.</p> <p>The approach to assessing the impacts of learning and development programmes varies depending on the type of learning and its target audience. Assessment methods include surveying employees, knowledge checks and formal examinations, as well as assessments of business performance indicators tied to the application of professional skills taught to employees. The effectiveness of learning methods is evaluated based on feedback received from employees and course developers, as well as the dynamics of relevant business performance indicators</p>	<p>404-1 Average hours of training per year per employee</p> <p>404-2 Programmes for upgrading employee skills and transition assistance programmes</p> <p>404-3 Percentage of employees receiving regular performance and career development reviews</p>
8	<b>Fair working conditions, decent wages and social benefits for employees, ensuring wellbeing</b> <i>For more information about this topic, see the <a href="#">Employees</a> and <a href="#">Health and Safety</a> sections</i>	<p>The Sustainable Development and People Management directorate supervises the personnel management process across all assets and oversees the implementation of the corresponding strategy, which stipulates regular revision of remuneration schemes and social benefit plans.</p> <p>The occupational health and safety departments at each Group asset ensure the adherence to applicable safety standards</p>	<p>The implementation of the human capital management strategy is reviewed annually and the results are considered for the following annual period planning</p>	<p>202-1 Ratios of standard entry level wage by gender compared to local minimum wage</p> <p>401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees</p> <p>401-3 Parental leave</p> <p>403-3 Occupational health services</p> <p>403-6 Promotion of worker health</p>

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9	<b>Diversity and inclusion</b> <i>For more information about this topic, see the <a href="#">Employees</a> section</i>	<p>The Sustainable Development and People Management directorate oversees personnel management, ensuring that the personnel structure is balanced, as well as guaranteeing that all employees receive equal opportunities and are treated with respect.</p> <p>The values enshrined in the Group's Code of Ethics include diversity and intolerance of any form of discrimination</p>	<p>The implementation of the human capital management strategy is reviewed annually and the results are considered for the following annual period planning.</p> <p>Metinvest regularly monitors headcount data, employee turnover ratios and personnel structure metrics, such as the proportion of women and people with disabilities in the workforce</p>	<p>202-1 Ratios of standard entry level wage by gender compared to local minimum wage</p> <p>405-1 Diversity of governance bodies and employees</p> <p>405-2 Ratio of base salary and remuneration of women to men</p>
10	<b>Local community engagement</b>	<p>The Regional Development department is responsible for implementing social projects, managing local community investments and reporting about performance to the Supervisory Board. The Supervisory Board approves the social partnership programme budget.</p> <p>The Group systematically implements long-term strategic social partnership programmes with NGOs and local authorities to support the sustainable development of the regions where it operates.</p> <p>When implementing our social partnership programmes, we focus on initiatives that have a significant impact on the social and economic development of cities and towns; enhance the attractiveness of regions where the Group operates; aim to reduce the outflow of qualified personnel, in particular young professionals; and aim to develop education, talent and local communities.</p> <p>In 2020, we implemented projects aimed at improving infrastructure, developing healthcare and education, supporting culture and sport, promoting environmental stewardship in the regions where the Group operates, preventing the spread of COVID-19 and protecting local communities</p>	<p>Metinvest monitors the alignment of social partnership programmes with local community needs.</p> <p>The Group is engaged in an ongoing and open dialogue with local communities and considers their opinion to ensure that projects will deliver maximum value for them. Metinvest's Social Research department helps to monitor and analyse the public opinion. We use the results of these studies to ensure that our initiatives meet the needs of local communities and form a basis for future decision making on social projects</p>	<p>203-1 Infrastructure investments and services supported</p> <p>203-2 Significant indirect economic impacts</p> <p>413-1 Operations with local community engagement, impact assessments and development programs</p> <p>413-2 Operations with significant actual and potential negative impacts on local communities</p>
11	<b>Economic support for communities and social investment</b> <i>For more information about this topic, see the <a href="#">Local Communities</a> section</i>			

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<b>ECONOMIC</b>				
12	<b>Economic performance</b> <i>For more information about this topic, see the <a href="#">About Metinvest section</a>, as well as <a href="#">Metinvest's 2020 annual report</a></i>	<p>The Audit and Finance Committee supervises all aspects of the Group's financial and audit activities acting in the best interests of the shareholders and on the behalf of the Supervisory Board. The Committee's main responsibilities include budget oversight, financial reporting, risk management, internal control monitoring, internal audit function oversight and external auditor assessment.</p> <p>The main responsibility of the Strategy and Investment Committee is to review and advise the Supervisory Board on the Group's strategic objectives, including new and existing businesses, investments, mergers and acquisitions.</p> <p>Economic planning is conducted by various functions and at different corporate levels that are involved in profit and cost generation. Metinvest annually revises its business development strategy for the following 12 months, which is subject to Supervisory Board approval. Short-term business plans are reviewed monthly with the participation of the Sales and Operational Planning Committee and the Budget Committee at the Executive Team level, and are approved by the CEO</p>	<p>The Group's economic performance is monitored through a set of strategic KPIs, including, but not limited to, financial and production data trends. Key business development and economic KPIs are reviewed monthly by the Executive Team and quarterly at the meetings of the Supervisory Board.</p> <p>Annual business planning is a process that involves all profit centres, cost centres and supporting functions. The Supervisory Board approves the business plan and reviews the report on its implementation quarterly, while the Executive Team reviews and approves the report on all key indicators monthly</p>	<p>201-4 Financial assistance received from government</p> <p>203-1 Infrastructure investments and services supported</p> <p>203-2 Significant indirect economic impacts</p>



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13	<p><b>Responsibility for the quality of products and services</b></p> <p><i>For more information about this topic, see the <a href="#">About Metinvest</a> and <a href="#">Sustainable Development</a> sections</i></p>	<p>The Regulation on Product Quality Management is the key document for the Group's assets that establishes all relevant internal processes and procedures. The Technology and Quality department monitors the compliance with the respective requirements in the production process at each asset.</p> <p>The Sales directorate manages customer relationships. The customer relationship management (CRM) system is instrumental for monitoring and governing the respective processes. Each asset assesses the effectiveness of customer interactions and customer satisfaction levels</p>	<p>The implementation of international standards helps to improve the quality management system at the Group's assets. By the end of 2020, almost all production sites were certified under ISO 9001.</p> <p>Each asset establishes its own quality council that meets to review the quality management system's compliance with ISO 9001 requirements. Each month, the Group's assets also assess the effectiveness of quality management systems and the activities of business units, check for customer complaints and examine non-compliance and defect levels.</p> <p>The effectiveness of customer relationship management is regularly evaluated based on the fulfilment of function-specific KPIs, which include sales volumes, order processing times and customer satisfaction, among others</p>	<p>417-1 Requirements for product and service information and labelling</p> <p>417-2 Incidents of non-compliance concerning product and service information and labelling</p> <p>417-3 Incidents of non-compliance concerning marketing communications</p>

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14	<p><b>Supply chain and supplier environmental assessment</b></p> <p><i>For more information about this topic, see the <a href="#">Sustainable Development section</a></i></p>	<p>The Logistics and Procurement directorate oversees the efficiency and stability of the supply processes. It is in charge of implementing procurement methodologies, developing procurement strategies for product categories, managing supplier relations and integrating sustainability principles into supply chain management.</p> <p>A single procurement function has been created at each asset that is represented by four separate units: a Supply Planning and Analysis Service, a Supply Service, a Procurement Service and a Central Warehouse. In 2020, all key assets transitioned to this structure.</p> <p>Mandatory counterparty screening (compliance, pre-qualification and pre-contract reviews) is an integral part of supplier management. It is the responsibility of the compliance function and the Analysis and Risk Management directorate.</p> <p>One of the criteria for preliminary qualification of a supplier is the mandatory familiarisation with the Group's Code of Ethics, the principles of which are aimed at ensuring working conditions in accordance with the highest standards of occupational health and safety, responsible social and environmental behaviour, compliance with business ethics and respect for human rights</p>	<p>The Group conducts internal audits to monitor and evaluate procurement performance. These audits provide recommendations to improve supply chain efficiency for the Executive Team to review, as well as appropriate measures that can be introduced. They also make it possible to monitor the implementation of recommendations that have been provided from past audits</p>	<p>102-9 Supply chain</p> <p>204-1 Proportion of spending on local suppliers</p> <p>308-1 New suppliers that were screened using environmental criteria</p> <p>308-2 Negative environmental impacts in the supply chain and actions taken</p> <p>414-1 New suppliers that were screened using social criteria</p> <p>414-2 Negative social impacts in the supply chain and actions taken</p>

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<b>ENVIRONMENTAL</b>				
15	<b>Energy efficiency</b> <i>For more information about this topic, see the <a href="#">Environmental Action</a> section</i>	<p>A dedicated division within the Operational directorate at the Executive Team level, as well as energy management and energy efficiency departments within each asset, plan and control energy consumption during production processes.</p> <p>They are also responsible for introducing energy efficiency measures aimed at reducing consumption to the levels outlined in performance targets and energy saving programmes.</p> <p>Metinvest develops energy management systems at its production sites that conform to ISO 50001:2011 and establishes procedures for risk identification, assessment and management within the energy management system to mitigate risk factors and prevent situations that may adversely impact performance</p>	<p>By the end of 2020, ten assets were certified to the new ISO 50001:2018 standard for energy management systems, which introduced the concept of risk assessment in the energy sector.</p> <p>We also conduct internal energy management audits at our assets based on a matrix and system that we developed to assess the efficiency of the certification requirements that we implemented. Internal energy management audit teams are guided in their work by our Procedure for Conducting Internal Energy Management System Audits at Production Sites</p>	<p>302-1 Energy consumption within the organisation</p> <p>302-3 Energy intensity</p> <p>302-4 Reduction of energy consumption</p>

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16	<b>Water, effluents and waste</b>	<p>Metinvest's general environmental management approach is determined by the provisions of the Group's Policy and Principles in the Field of Health, Safety and the Environment.</p> <p>Our environmental protection goals are aimed at reducing our environmental impact and are overseen at several governance levels, from the Supervisory Board's Health, Safety and Environmental Committee to the dedicated function at the Executive Team level and responsible units at the Group's assets.</p> <p>The Health, Safety and Environmental Committee monitors the Group's environmental protection performance and determines the priorities of the environmental programmes every quarter.</p> <p>At each asset, a special environmental committee consists of the plant's management and representatives of the environmental protection departments that are responsible for:</p> <ul style="list-style-type: none"> <li>– Monitoring air emissions, water withdrawal and water discharge permits</li> <li>– Observing waste management standards</li> <li>– Implementing land restoration and landscaping projects</li> <li>– Reporting performance results</li> </ul> <p>In 2020, a department for Sustainable Development and Environmental Management was created in the Sustainable Development and People Management directorate. Its main responsibilities include: ensuring compliance with legislative requirements; assessing risks and conducting internal environmental audits; developing strategies and concepts for reducing assets' impact on air, water and land resources and biodiversity; and conducting climate impact assessments</p>	<p>In 2020, Metinvest continued to evaluate its assets for compliance with the requirements of ISO 14001. By the end of the reporting period, 12 Group assets were certified as compliant with the ISO 14001:2015 standards.</p> <p>Third-party assessments are conducted on an annual basis to validate conformity of the assets with the standard and renew their certification.</p> <p>Metinvest conducts regular on-site internal audits jointly with certified laboratories and accredited bodies</p>	<p>303-1 Interactions with water as a shared resource</p> <p>303-2 Management of water discharge-related impacts</p> <p>303-3 Water withdrawal</p> <p>303-4 Water discharge</p> <p>303-5 Water consumption</p> <p>304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</p> <p>304-2 Significant impacts of activities, products and services on biodiversity</p> <p>304-3 Habitats protected or restored</p> <p>304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations</p> <p>305-1 Direct (Scope 1) GHG emissions</p> <p>305-2 Energy indirect (Scope 2) GHG emissions</p> <p>305-4 GHG emissions intensity</p> <p>305-7 Nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>) and other significant air emissions</p> <p>306-1 Waste generation and significant waste-related impacts</p> <p>306-2 Management of significant waste-related impacts</p> <p>306-3 Waste generated</p> <p>306-4 Waste diverted from disposal</p> <p>306-5 Waste directed to disposal</p>
17	<b>Biodiversity</b>			
18	<b>Climate change</b>			
19	<b>Emissions</b>			
20	<b>Waste generation</b>			
	<p><i>For more information about these topics, see the <a href="#">Environmental Action section</a></i></p>			