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The Watering Farm, Creeting St. Mary, Ipswich, Suffolk, IP6 8ND

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MC Asset Co Limited
Stakeholder Engagement Plan

This Stakeholder engagement plan enables us to share information with important stakeholders, responding to their concerns and collaborating to explore mutually beneficial opportunities. The policy is aimed at key common stakeholders including regulators, representatives for local communities and interested organizations, investors, employees and labour.

Engaging stakeholders ensures that we can understand the wider environmental and social impact of our business activities, transparently share information and affirm our accountability with affected groups. In some cases, engagement with local stakeholders is necessary to avoid business disruptions caused by government or community delays.

The aim of our plan is to create and execute action plans to build trusted relationships with our important stakeholders.

This plan is issued on the date below and will be reviewed and updated at least annually.

Signed



Legal Director

Date 31 March 2020

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Identification of stakeholders and level of importance

We have identified the following stakeholders and set out their importance to the business

Category of Stakeholder	Stakeholders	Indicate level of importance (very high/high/medium/ low/very low/NA)
Clients and Customers	Gas and Electricity off takers and suppliers Digestate off takers CO2 off takers	Very High
Local community and Public	Local residents living in the vicinity of the site	Medium
Contractors and Sub-contractors	Feedstock suppliers	Very High
Employees	Site operational teams at each AD site	Very high
Trade unions and Organized labour	N/A	N/A
Investors and Shareholders	RBS and Heathpatch	High
Regulators and Governments	Environment Agency Planning Authority Ofgem Health and Safety Executive (HSE)	Very High
NGOs (Non-governmental organizations)	Financial Auditors ISO Auditors	Low
Industry peers and Industry Association	Renewable Energy Association	Low
Materials and Services Suppliers	Maintenance service providers	High
Landlord	Each landlord at the relevant AD site	Low (provided lease terms are complied with but must be consulted on planning)

Where any Stakeholder is of medium or higher importance, we have prepared a Stakeholder Engagement Plan for each Stakeholder. These plans will be reviewed and added to, annually as required. The designation of Low – High importance of the Stakeholder will also be reviewed annually and adjusted as needed.

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MC Asset Co Limited Stakeholder Engagement Plans

Where the level of importance with the stakeholder is medium or above below is our detailed plan for our

Clients and Customers

Who	**Who is the stakeholder group?** • Gas, Electricity and Heat off takers (utility companies and private wire customers) • Digestate off takers • CO2 off takers
Why	**Why are our operations important to this stakeholder?** Customers require constant and reliable sources of gas, electricity and heat for the energy market and CO2 for the food and drink market. Farmers require digestate to improve soil acting as fertiliser. **How do they influence our operations? What is their ability to influence our operations?** These customers provide income for the sites from off take arrangements and influence our operations so that we optimise outputs to increase revenue. If customer utility requirement drops, the sites will have less income. If customers do not take off digestate, there may become issues with storage capacity for digestate on site.
What	**What information do we need to provide to this stakeholder?** Monthly meter readings for supply – for gas and electricity these are generally done on self-billing arrangements with majority of the utility providers. Private wire customers require monthly invoicing. Off take of digestate requires regular liaison and discussion with the farmer to ensure that material is taken off site in a timely manner. Planned maintenance downtime through the year and notification of unplanned downtime which may lead to lack of supply must be notified to the utility and CO2 customers. **What decisions and operations need to go through stakeholder engagement?** Decisions on renewing energy and CO2 contracts on their expiry – generally every 12 – 24 months – this requires tender or obtaining several quotes Digestate offtake planning needs to be agreed annually with some digestate off takers
How	**How will we engage with this stakeholder?** By email, telephone and face to face meetings

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When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Engagement on a monthly basis
Responsibilities	**Who is responsible for engaging with this stakeholder?** Utility companies and private wire – accounts team/AD Managers and Directors Digestate offtakers – AD Managers and Directors CO2 offtakers – AD Managers and Directors **Is there a stakeholder representative and what is their role?** Various companies have appointed contract managers. We liaise with whoever the appointed person is **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company. **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Local Community and Public

Who	**Who is the stakeholder group?** Local residents in the vicinity of each site, including Parish Councils and Local Residents Groups where applicable
Why	**Why are our operations important to this stakeholder?** We strive to ensure that we do not cause any nuisance from our operations to these stakeholders such as noise, odour, dust or other environmental issues

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	How do they influence our operations? What is their ability to influence our operations? Weather and wind directions are monitored as well as off-site odour checks to ensure that no nuisance is caused to local residents. Residents can influence our operations by complaining to the Environment Agency and Local Planning Authority which could result in enforcement action if proven.
What	**What information do we need to provide to this stakeholder?** Updates on any planned changes at the site – we find it is better to advise residents directly and positively rather than them finding out about planned changes from Planning notification letters. **What decisions and operations need to go through stakeholder engagement?** Stakeholders will be consulted on any planning applications for the site or significant operational changes.
How	**How will we engage with this stakeholder?** By email to resident groups and parish councils with site updates and through site visits and compost giveaway days. There is a local liaison email which the local residents are encouraged to use to raise any issues or concerns about the sites.
When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Engagement is infrequent when there are no issues on site. Where residents raise complaints, we seek to communicate with them on a frequent basis until the issues are resolved.
Responsibilities	**Who is responsible for engaging with this stakeholder?** Site managers and compliance manager and Directors as needed **Is there a stakeholder representative and what is their role?** Chair of Local Liaison Group or Chair of Parish Council are generally key contacts. Where individuals raise any complaints we respond to them directly **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company.

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	Which of the following characteristics describe the process? The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Contractors and Sub-contractors

Who	**Who is the stakeholder group?** Feedstock suppliers
Why	**Why are our operations important to this stakeholder?** Provide income for local farms who grow feedstock for the site **How do they influence our operations? What is their ability to influence our operations?** Good quality feedstock delivered in a timely manner is critical for continuous operations of the AD plants. If the stakeholder fails to deliver crops or delivers low gas yield crops, the plant performance would be negatively impacted unless replacement crops could be sourced.
What	**What information do we need to provide to this stakeholder?** Information on feedstock requirements and harvest plans, ensure Quality and Environmental policies and sustainability requirements are followed and meet the needs of statutory and regulatory requirements. **What decisions and operations need to go through stakeholder engagement?** Agreement on what crops are to be grown, pricing and harvesting arrangements and delivery arrangements to the clamps at the AD site
How	**How will we engage with this stakeholder?** By telephone and email and growers days which are held with local farmers attending
When	**What is the frequency and timing that we will provide information and engage with this stakeholder?**

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	Frequency depends on the time of year. There will be regular contact during the planning and planting stage and at harvest time. Information on when crops will be harvested and rotation and delivery procedures and testing of crops will need to be notified to stakeholders on an annual basis.
Responsibilities	**Who is responsible for engaging with this stakeholder?** Feedstock manager and site managers **Is there a stakeholder representative and what is their role?** Farmers usually represent themselves but can have a land agent appointed who we would then liaise with. **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company. **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Employees

Who	**Who is the stakeholder group?** Staff at each AD site
Why	**Why are our operations important to this stakeholder?** To provide employment and career development and training **How do they influence our operations? What is their ability to influence our operations?**

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	Good staff enable us to operate the AD plants well. Proactive staff will identify issues with wear of plant and machinery in advance of breakdown, which minimises or prevents downtime of the plant. Staff respond to emergency call outs. Where staff do not respond or do not perform well, the performance of the site may be compromised if no action is taken.
What	**What information do we need to provide to this stakeholder?** Information on day to day operations of the plant, job descriptions so that each member of the team is clear on what their responsibility is, clear work instructions and risk assessments to ensure staff can work safely, monthly salary information, annual appraisals and training requirements. **What decisions and operations need to go through stakeholder engagement?** Staff are consulted on any changes to proposed site operations or changes to the plant. Staff are consulted on health and safety. Staff have a responsibility to make health and safety reports including near misses. Staff are consulted on any changes to their contracts.
How	**How will we engage with this stakeholder?** Site manager holds morning meeting to discuss daily operations. Sites are audited internally. Compliance manager provides support to the staff during compliance visits. Annual appraisals are held.
When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Daily
Responsibilities	**Who is responsible for engaging with this stakeholder?** Site managers, accounts team for payroll and Directors on company policy **Is there a stakeholder representative and what is their role?** N/A – there are no trade unions **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The staff have a grievance and disciplinary procedure which must be followed in the event of any issues arising. This is contained in the staff handbook **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group

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	☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Investors and Shareholders

Who	**Who is the stakeholder group?** RBS and Heathpatch Limited
Why	**Why are our operations important to this stakeholder?** Provide annual returns on investment and shareholder dividends as well as information on the investments operational performance and future development plans. **How do they influence our operations? What is their ability to influence our operations?** Stakeholders influence operations by deciding whether to provide additional funding for expansion projects. If no funding is provided, expansion would be more problematic unless other third-party funding could be secured.
What	**What information do we need to provide to this stakeholder?** Monthly and Weekly operational reports, health and safety reports, staff reports Investment reporting, GRESB and ESG reporting. **What decisions and operations need to go through stakeholder engagement?** Decisions are taken at monthly board meetings with Foresight, who manages the investments on behalf of RBS, and Heathpatch representatives on the Boards
How	**How will we engage with this stakeholder?** By telephone and email and monthly board meetings
When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Monthly Board meetings Weekly and monthly operational reports provided by email Regular telephone discussions
Responsibilities	**Who is responsible for engaging with this stakeholder?**

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	AD Managers and Directors with Site Managers as needed **Is there a stakeholder representative and what is their role?** Foresight represent RBS **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company. **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Regulators and Governments

Who	**Who is the stakeholder group?** Environment Agency Planning Authority Ofgem Health and Safety Executive (HSE)
Why	**Why are our operations important to this stakeholder?** These bodies oversee legal and regulatory compliance for the AD sites **How do they influence our operations? What is their ability to influence our operations?** Sites must follow all rules and legislation set by these bodies and Government to ensure • Environmental compliance • Health and Safety legislation compliance • Compliance with all planning permission requirements for the site

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	• Compliance with Ofgem regulation for operations of generation stations and tariff regulation Where the above are breached the regulators have the power to take measures against the site including ultimately revoking licenses for serious non conformity
What	**What information do we need to provide to this stakeholder?** Environment Agency – provide waste returns where applicable and undertake site checks and record information in the site diary Planning Authority – provide information in respect of any changes to operations at the site which require planning permission. Comply with planning permission requirements and provide information to support compliance if required by the Authority. HSE – report any RIDDOR incidents Ofgem – provide meter readings for all sites and annual sustainability information **What decisions and operations need to go through stakeholder engagement?** Environment Agency – any changes to site operations which require a change of permit Planning Authority – any planning applications for changes on site Ofgem – any changes in feedstocks need to be approved
How	**How will we engage with this stakeholder?** By telephone and email
When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Quarterly meter readings submitted to Ofgem and annual sustainability information submitted EA – quarterly waste returns and annual reports to be submitted. Liaison on permit issues as and when needed Planning Authority and HSE – as operational need arises
Responsibilities	**Who is responsible for engaging with this stakeholder?** Compliance Manager and Site Managers and Directors **Is there a stakeholder representative and what is their role?** N/A **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and

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	provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company. These Authorities also have their own grievance procedures where we wish to raise any issues. **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider

Materials and Services Suppliers

Who	**Who is the stakeholder group?** Maintenance service providers
Why	**Why are our operations important to this stakeholder?** Provide income and jobs for businesses providing services to our AD plants **How do they influence our operations? What is their ability to influence our operations?** We need reliable service providers to ensure that plants are well maintained and that there is good emergency breakdown cover. If they fail to perform, they influence the operations but leading to significant periods of downtime and loss of revenue if repairs are not completed quickly.
What	**What information do we need to provide to this stakeholder?** Planned maintenance schedules Requirements for work and contract terms **What decisions and operations need to go through stakeholder engagement?** Quotation and agreeing terms for service and repair work
How	**How will we engage with this stakeholder?** By telephone and email

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When	**What is the frequency and timing that we will provide information and engage with this stakeholder?** Frequency depends on operational need
Responsibilities	**Who is responsible for engaging with this stakeholder?** Site managers and AD managers with budget sign of by Directors for high value work and legal sign off on contracts from Legal Director **Is there a stakeholder representative and what is their role?** No **Are stakeholder engagement facilitators required?** No
Grievance Mechanism	**What is the process for this stakeholder to communicate grievances?** The grievance process is governed by our grievance policy which provides for various methods of reporting a grievance including by email or by telephone and provides an escalation mechanism where grievances are not resolved. This grievance policy is available to all stakeholders of the company. **Which of the following characteristics describe the process?** The process… ☒ is known and accessible to the stakeholder group ☒ works with the stakeholder to come to solutions ☒ is fair and free of discrimination for all parties ☒ incorporates learnings to prevent future problems ☒ maintains anonymity of the party with a grievance ☒ has a clear procedure to reach a conclusion ☒ prohibits retaliation against the party with a grievance ☐ is handled by a third-party service provider