

# CD&R Firefly Holdco Limited Reporting Criteria 2024

This document includes the reporting criteria for selected ESG performance metrics subject to independent limited assurance procedures for the year ended 31<sup>st</sup> December 2024.

# **Contents**

1.	. Introduction				
2.	. Reporting period				
3.	Repo	orting boundary	2		
	3.1.	Organisational boundary	2		
	3.2.	Operational control	3		
	3.3.	Acquisitions and disposals	3		
4.	Resta	atement policy	4		
5.	Data	hierarchy	4		
6.	Gree	nhouse gas emissions metrics	6		
	6.1.	Scope 1 GHG emissions (tCO <sub>2</sub> e) ('Scope 1')	6		
	6.2.	Scope 2 GHG emissions (tCO <sub>2</sub> e) (Scope 2)	9		
	6.3.	% electricity consumption procured on a renewable tariff	11		
7.	Socia	ıl metrics	12		
	7.1.	Total number of volunteering hours	12		
	7.2.	Total Number of Training Hours per Employee	12		
8.	HSE ı	metrics	14		
	8.1.	Confirmed Litres of Fuel Lost to Ground	14		
	8.2.	Employee accident rate per 200,000 hours worked	15		
9.	EV m	etrics	15		
	9.1.	Total Number of Live EV charging units	15		
	9.2.	Total number of kWh sold	16		
	9.3.	Reliability of EV chargers	16		

## 1. Introduction

CD&R Firefly Holdco Limited ('MFG', or 'the Company', or 'The Group') is the UK's largest independent forecourt operator based in the UK and Channel Islands. MFG is the largest operator of 'open network' EV ultrarapid chargers, available to the public throughout our growing network.

Our business is focused on four highly integrated key strategic pillars – Fuel, EV Charging, Retail Estate Development and Valeting. We offer customers a growing range of services that operate alongside our dual-fuel strategy – these include a leading valeting offer, a convenient retail and 'food to go' network, and online delivery lockers.

MFG appointed PricewaterhouseCoopers LLP ('PwC') to perform an Independent limited assurance engagement on selected ESG performance metrics for the year ended 31<sup>st</sup> December 2024 in the 2024 Sustainability Report in accordance with the International Standard on Assurance Engagements 3000 (Revised) 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' and International Standard on Assurance Engagements 3410 'Assurance engagements on greenhouse gas statements', issued by the International Auditing and Assurance Standards Board.

# 2. Reporting period

Selected ESG performance metrics are reported for the period 1<sup>st</sup> January to 31<sup>st</sup> December each year to align with the Group financial statements.

# 3. Reporting boundary

# 3.1. Organisational boundary

MFG operates in the UK and Channel Islands. The organisational boundary for the purpose of these ESG performance metrics, as covered in this reporting criteria, is detailed below.

**Table 1. Organisational boundary** 

Organisational boundary	ESG performance metric
UK assets under operational control (excl.	Scope 1 GHG emissions (tCO <sub>2</sub> e)
Channel Islands	Scope 2 (location based) GHG emissions (tCO₂e)
	Scope 2 (market based) GHG emissions (tCO₂e)
	% electricity consumption procured on a
	renewable tariff (%)
	Confirmed litres of fuel lost to ground
	Total number of 'live' EV charging units
	Total number kWh sold
	Reliability of EV chargers (%)
Motor Fuel Limited, St Albans Operating	Total number of volunteering hours
Company Ltd and CD&R Firefly Bidco Ltd	Total training hours per employee
employees	Employee accident rate per 200,000 hours worked

The organisational boundary is reviewed on an annual basis to ensure that any new or discontinued operations are included or removed where necessary. A review of properties is completed to identify what, if any, new sites fall within the scope of the reporting (e.g. due to site closures, divested entities etc). The updated organisational and property records are then reconciled to determine the boundary for the reporting period. Refer to section 3.3. for our policy in relation the 'Acquisitions and disposals'.

# 3.2. Operational control

Operational control means that the Company or one of its subsidiaries has the full authority to introduce and implement operating policies in the operation. Under the operational control approach, a company accounts for 100% of consumption that fall within the organisational boundary. MFG characterises its forecourts in three ways, Company Owned Franchise Operated (COFO), Company Owned Company Operated (COCO), Dealer Owned, Dealer Operated (DODO). For the purposes of this exercise COFO and COCO sites are in MFG's operational control, DODO are not.

Also excluded are UK depots as they are leased to third parties and are consequently considered outside of MFG's operational control. Hand car wash (HCW) sites are also considered as out of scope due to MFG's lack of operational control. Also excluded are business assets and operations based in the Channel Islands, this covers a low number of sites - currently just 4, and consumption is considered immaterial to the Group.

## 3.3. Acquisitions and disposals

For new sites acquired as part of a legal entity acquisition during a reporting period, these will be incorporated from the 1<sup>st</sup> of January of the following reporting period in accordance with the scope and boundary criteria set out in this document, unless otherwise indicated in our reporting. The comparative figures, where presented, will also be recalculated as per the restatement policy in section 4 below if the significance threshold is exceeded.

In the event of a legal entity divestment during a reporting period, any associated sites disposed of will be included up to the date of divestment within the reporting period, unless the restatement policy threshold in section 4 is exceeded, in which case the divested sites will be excluded and similarly removed from the comparative figures, where presented.

For new sites opened during the reporting period as part of organic business growth, these are reported from the date MFG gain operational control of the site. For the greenhouse gas emissions metrics, where consumption data is based on invoices, usage is reported in line with the billing period, starting from the date covered by the first bill. Any sites opened within one month of the year-end (after 30<sup>th</sup> November), will be included from the start of the following reporting period. Similarly, reporting of data for a site that closes during the reporting period ceases after the date when the site closes (end of lease agreement), with any final invoices received after this date but covering the period up to this date being included.

# 4. Restatement policy

To ensure reported figures remain comparable over time, we will restate the comparative figures presented in the event of specific changes outlined here.

Where restatements have been made for specific ESG performance metrics, these will clearly be outlined in our reporting. Restatements are considered necessary if there is a change to an individual ESG performance metric of greater than 5% (our significance threshold). Restatements may be needed as a result of:

- a) Structural change: Where we experience a structural change (i.e. merger, divestment, acquisitions) to the scope of our reporting in future periods, we will recalculate the prior year and other data as required, so that we can monitor our performance on a consistent basis. Please refer to '3.3 Acquisitions and disposals' for further details.
- b) Methodology change: Changes in calculation methodology or improvements in the accuracy of emission factors or activity data, which result in a significant impact on the data.
- c) Corrections: Discovery of significant errors, or a number of cumulative errors, that are collectively significant.

# 5. Data hierarchy

Data for the greenhouse gas emissions metrics (see section 6) is collected from invoice data. Should invoice data not be available or appear inaccurate an estimation is carried out using a hierarchy of estimation techniques, as detailed below.

**Table 2. Estimation techniques** 

Est	imation technique	Description
1.	Pro-rata extrapolation	This means using figures available for one period of time (i.e. a
		reference period) to get average consumption figures for a shorter
		period.
		The length of the reference period used would depend on the
		missing data gap being estimated, but generally the reference
		period should be longer than the missing gap being filled. For
		example, if one or two months are missing, the previous 3 months
		of data would be used for a daily average. The pro-rata reference
		period would usually be the most recent data available prior to the
		missing data gap to account for seasonality and usage patterns. If
		more than 6 months is missing, the benchmark technique is
		recommended to fill the gap.
2.	Direct comparison	This means using figures from another comparable time period to
		fill the gap. Ideally this would be based on data from the same
		month in the previous year, as this would reflect typical seasonality.
3.	Benchmark estimation	This means using the utility consumption of one asset or activity as
		a proxy to estimate the consumption of another asset, particularly
		if they are of similar size, age or build and have similar
		characteristics, except for when estimating electricity consumption
		where consumption from all assets is factored in.
		Benchmark values can be sourced from either general building or
		sector specific values (i.e. for energy, from CIBSE TM46 Energy
		Benchmarks) or calculated from other similar sites within the same
		dataset. Typically, the calculation involves normalising annual utility
		use on a square meter basis (using Gross Internal Area
		measurements), so annual usage is adjusted to building size. If only
		part of a year needs estimating, the annual amount would be pro-
		rated on a daily basis.
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# 6. Greenhouse gas emissions metrics

# 6.1. Scope 1 GHG emissions (tCO<sub>2</sub>e) ('Scope 1')

MFG measures Scope 1 and Scope 2 GHG emissions, as defined by the GHG Protocol Corporate Accounting and Reporting Standard, which includes carbon dioxide ( $CO_2$ ), methane ( $CH_4$ ), nitrous oxide ( $N_2O$ ), nitrogen trifluoride ( $N_3$ ), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride ( $SF_6$ ). GHG emissions are calculated by applying the relevant emissions factors to the activity data.

Table 3. Summary of Scope 1 emissions sources

Emission source	Data source	Data units
Natural gas	Invoice records	Kilowatt-hour (kWh)
Diesel generators	Invoice records	Litres (I)
Fugitive emissions	Refrigerant F-gas records	Kilograms (kg)
Company owned vehicles	Mileage expense records	Miles (mi)

### 6.1.1. Natural gas

Natural gas is used for space heating at a limited number of fuel stations.

Where the energy contracts are the responsibility of MFG, the activity data is collected from invoice records in kWh units monthly. The invoices are validated by SystemsLink and recorded on their system. Data is exported from SystemsLink and further processed and reviewed to comment on any reasons for gaps in data. Data quality checks include identifying new or lost supplies/sites and comparisons with the previous year's data.

Where accurate data is unavailable, natural gas usage will need to be estimated in accordance with the data hierarchy.

Once all records of natural gas have been quantified in energy terms (kWh), this data is converted into emissions using the standard natural gas (gross calorific value) emission factor provided by the DESNZ for the corresponding reporting year.

Table 2. Emission factors used in natural gas emission calculations

Emission Factor Name	Emission Factor (kg CO₂e/mile)	Source
Scope 1 Emission Factor (2024)		
Natural Gas	0.18290	UK Gov 2024 (DESNZ)

#### 6.1.2. Diesel generators

Some sites use diesel generators to provide backup electricity. The generators are provided along with fuel by a contractor, who bill MFG with an itemised breakdown, including "fuel deliveries". The diesel generators are not fitted with meters, therefore metered usage data in any given period is not available. Instead, reported usage is based upon top up invoices provided by the contractor via third-party platforms (Verisae and NetSuite) on the basis that diesel purchased during the year is consumed within the same period. Data quality checks involve reviewing Verisae and NetSuite for orders against the supplier invoices ensuring they match the Verisae work order. The litres are converted into emissions using the diesel (average biofuel blend) emission factors provided by DESNZ.

Table 5. Emission factors used in diesel emission calculations

Emission Factor Name	kWh factor (litres to kWh)	Emission Factor (kg CO₂e/mile)	Source	
Scope 1 Emission Factor (2024)				
Diesel (Average Biofuel Blend)	10.511	2.51279	UK Gov 2024 (DESNZ)	

## 6.1.3. Fugitive emissions ('F-Gas')

F-gas records are maintained by our maintenance contractor (Jordon), with the amount of refrigerant purchased recorded in kilograms. The refrigerant recorded is used for topping up lost refrigerant in systems (HVAC systems and chillers/freezers) and is therefore a proxy for what has escaped to air in the year. Note it also however includes a small amount of replacement gas from contaminations and reclaims during equipment servicing.

With the availability of this data, a 'Simplified Material Balance Method' is used to calculate the amount of refrigerant leakage, as per the HM Government Environmental Reporting Guidelines (2019).

# 3The formula is summarised as follows:

Total refrigerant recorded (kg) × Refrigerant type Global Warming Potential

Table 6. Summary of the main refrigerants used by MFG

Refrigerant Type	Global Warming Potential	Source
R32	749	International Institute of Refrigeration
		(IIFIIR) 2023
R134A	1470	International Institute of Refrigeration
		(IIFIIR) 2023
R290	0.06	UK Gov 2024 (DESNZ)
R404A	3943	UK Gov 2024 (DESNZ)
R407F	1674	UK Gov 2024 (DESNZ)
R410A	1924	UK Gov 2024 (DESNZ)
R448A	1497	International Institute of Refrigeration
		(IIFIIR) 2023
R449A	1504	International Institute of Refrigeration
		(IIFIIR) 2023
R452A	2336	International Institute of Refrigeration
		(IIFIIR) 2023

## 6.1.4. Company owned vehicles

A company owned car is defined as a vehicle that is owned or leased in the name of the Company or its subsidiaries for a period of greater than 30 days, thereby distinguishing it from short term rental vehicles (considered scope 3 emission sources).

Company owned mileage records are available via expense records. A detailed report is generated showing the type of mileage claim ("mileage", "business mileage" and "private mileage"), date of claim, mileage travelled, rate of claim in pounds, vehicle fuel type and engine size. The data is included within the reporting period based on the date that the claim was made, rather than when the claim was processed or when the mileage took place.

Activities of company owned cars are logged on expense records and categorised as "business mileage". Included within these records are the date of claim, mileage travelled, rate of claim in pounds, vehicle fuel type and engine size. The mileage is summarised in a PivotTable and sorted by fuel type, engine size and category of claim. If no records of the fuel type and engine size is available, then the emission factor for an average car of unknown fuel type is used. The total values of business mileage are then converted into emissions using the associated emission factor as outlined by DESNZ for the corresponding reporting year for respective fuel type and size. Any records of electric vehicle travel are reported under Scope 2.

Records categorised as "private mileage" are excluded as these are journeys unrelated to company activities. "Mileage" relates to employee-owned vehicles and therefore would be reported in Scope 3 (category 6, business travel). Any mileage not claimed for via an expense claim would not be included.

Table 7. Emission factors used in company owned vehicle emission calculations

Emission Factor Name	Fuel Type	Emission Factor (kg CO₂e/mile)	Source		
Scope 1 Emission Factors	Scope 1 Emission Factors (2024)				
Small Car	Diesel	0.22522	UK Gov 2024 (DESNZ)		
Medium Car	Diesel	0.27050	UK Gov 2024 (DESNZ)		
Large Car	Diesel	0.33362	UK Gov 2024 (DESNZ)		
Small Car	Petrol	0.23126	UK Gov 2024 (DESNZ)		
Medium Car	Petrol	0.28526	UK Gov 2024 (DESNZ)		
Large Car	Petrol	0.43267	UK Gov 2024 (DESNZ)		
Average Car	Unknown	0.26860	UK Gov 2024 (DESNZ)		

# 6.2. Scope 2 GHG emissions (tCO₂e) (Scope 2)

Total Scope 2 GHG emissions are emissions that occurred in sites under MFG operational control, and include the following:

Table 8. Summary of Scope 2 emission sources

Emission source	Data source	Data units
Purchased electricity	Invoice records, landlord records or estimations	kWh
Public electric vehicle charge point (EVCP) usage	Monthly usage records from either sub-metering or dedicated supplies	kWh
Company owned vehicles	Mileage records from expense claims	miles
(electric vehicles)		

Electricity is reported under both market-based and location-based methods.

### 6.2.1. Purchased electricity

Electricity is used at all locations and purchased from the grid at owned/controlled sites or via the landlord.

As per the methodology for natural gas (section 6.1.1), where the energy contracts are the responsibility of MFG, the activity data is collected from invoices in kWh units monthly. The invoices are validated by SystemsLink and recorded on their system. Data is exported from SystemsLink and further processed and reviewed to comment on any reasons for gaps in data. Data quality checks include reviewing new or lost supplies/sites and comparisons with the previous year's data.

Where accurate data is unavailable, electricity usage will need to be estimated in accordance with the data hierarchy (section 5).

Once all records of purchased electricity have been quantified in energy terms (kWh), this data is converted into emissions as per the dual reporting approach outlined in section 6.2.4, resulting in location- and market-based emissions.

### 6.2.2. Public electric vehicle charge point (EVCP) usage

A growing number of fuel stations also provide public electric vehicle charge points (EVCP). This usage is excluded from MFGs GHG emissions as it falls outside the operational control boundary of MFG.

EVCP usage is recorded monthly on the Driivz system managed by the EV Operations Team. Data is exported from this system in a spreadsheet, which displays the site name, site reference, open date and MPAN (if available). The MPAN is cross-checked against invoice records to identify whether the charge point is a "dedicated" supply (a supply providing electricity to the charge point only) or a "shared" supply (a supply providing electricity to both the charge point and the rest of the fuel station). This is done by using the site reference to consolidate the EVCP data and invoice data to review electricity records on a site-by-site basis.

Dedicated EVCP data is excluded from the reported energy use and Scope 2 emissions to leave only the records of purchased electricity for a site. This is because these emissions fall outside the operational control boundary of MFG. Shared EVCP data is subtracted from the purchased electricity at a site to provide a net usage figure, to ensure we are reporting only the emissions within the operational control of MFG. This is done by converting EVCP usage into negative values, meaning site level usage can be summed to provide a net value for retail usage only.

The remaining net electricity usage is summarised at a site level to ensure that all owned or controlled assets have energy usage associated with them. In the event that invoice data is not available for a site, alternative data sources will be sought, or usage will be estimated as outlined in section 6.2.1 for purchased electricity.

#### 6.2.3. Company owned vehicles (electric vehicles)

The methodology followed for electric vehicle company owned vehicles follows that described in section 6.1.4, company owned vehicles. A breakdown of the vehicle size is not currently provided; therefore, all electric vehicles are considered "average" in size. Any mileage not claimed for on expenses is excluded.

Table 9. Emission factors used in company owned electric vehicle emission calculations

<b>Emission Factor Name</b>	Fuel Type	Emission Factor (kg CO₂e/mile)	Source	
Scope 2 Emission Factor (2024)				
Average Car	Battery Electric	0.07015	UK Gov 2024 (DESNZ)	

#### 6.2.4. Location- and market-based calculations

Table 10. Emission factors used in location- and market-based emission calculations

<b>Emission Factor Name</b>	Emission Factor (kg CO <sub>2</sub> e/kWh)	Source			
Location-based					
UK Average	0.20705	UK Gov 2024 (DESNZ)			
Market-based	Market-based				
Renewable energy contracts	0.0	Supplier specific			
Other contracts	Contract or supplier specific	Contract/supplier fuel mixes			
Residual emissions	0.38840	AIB, European Residual Mixes 2023			

A dual-reporting approach is taken to reporting Scope 2 emissions, meaning both location-based and market-based emission figures are reported together. The location-based method involves converting purchased electricity to GHG emissions by using the UK average electricity emission factor as calculated by the UK Government DESNZ.

The market-based method involves converting purchased electricity to GHG emissions according to the contract specific emissions intensity per kWh. Contractual instruments are acquired from each supplier annually and assessed against the GHG Protocol Scope 2 Quality Criteria. If the contractual instruments do not meet the 8 quality criteria, or are unavailable, then other data shall be used as an alternative as per the GHG Protocol Scope 2 Data Hierarchy.

For electricity not purchased on a certified renewable energy contract, a supplier specific emissions factor is used (where applicable). If this is not available, a UK specific residual emission factor is used. The residual emission factor is uplifted to account for all non-renewable energy sources and is sourced from the Association of Issues Bodies (AIB), European Residual Mixes. The AIB emission factor is used that corresponds to the reporting year, or if unavailable, then the emission factor that relates to the most recent period available. Note that the AIB emissions factors are a CO2/kWh and is used as a proxy for CO2e/kWh.

Note that the calculation of market-based emissions is based on our energy suppliers fulfilling their contractual obligations under the terms of renewable tariffs to back all energy supplied to all of its customers on such tariffs by Renewable Energy Guarantees of Origin (REGOs). We have no oversight over that process.

# 6.3. % electricity consumption procured on a renewable tariff

The percentage of electricity consumption procured on a renewable tariff is calculated and reported separately to the GHG emissions. This metric is concerned with purchased electricity only.

The details of electricity contracts are recorded on SystemsLink, including start and end dates, supplier, and whether the contract is committed to supplying 100% renewable energy or not.

During the process of reviewing the contractual instruments as part of the market-based calculations, the purchased electricity corresponding to the contractual period of energy contracts is categorised as renewable or non-renewable. The term 'renewable' in our system means REGO backed contracts where the supplier specific emission factor for the associated tariff is nil.

The formula for calculation of % electricity consumption procured on a renewable tariff is:  $((Total\ electricity\ procured\ on\ a\ renewable\ tariff\ (kWh)\ -\ total\ EV\ sold\ (kWh))\ /\ (total\ purchased\ electricity\ (kWh)\ -\ total\ EV\ sold\ (kWh)))\ x\ 100$ 

# 7. Social metrics

# 7.1. Total number of volunteering hours

#### 7.1.1. Definitions

This metric records the total number of volunteering hours recorded across the reporting year. Volunteering hours are any hours an employee spends volunteering at a charity during their contracted working hours. MFG employees can take up to 2 days paid charity volunteering leave per annum. Exceptions to the policy can be made at the discretion of senior executives. All requests are agreed with the employee's line manager, or the HR team where appropriate, and booked via the Sage HR online portal along with the name and registration number of the charity.

An employee refers to a person employed by Motor Fuel Limited, St Albans Operating Company Ltd or CD&R Firefly Bidco Ltd, excluding those employed in the Channel Islands, on a permanent basis at any point during the reporting period.

### 7.1.2. Data gathering

The Sage HR online portal is used by employees to book all types of leave (holiday, sickness, volunteering, etc.). The number of volunteering hours per employee can be exported from the portal by the HR team. Data quality checks of the exported data are carried out using employee numbers.

Volunteering hours can be booked as either a half day or full day. Exceptions to the policy such as booking volunteering hours in half hourly increments can be made at the discretion of senior executives. In the case that exceptions are applied, these are manually documented by the HR team.

### 7.1.3. Final calculations

The total number of volunteering hours across the reporting period are summed based on the date the volunteering took place. The total number of volunteering days is converted into hours based on 7 hours working day.

#### 7.2. Total Number of Training Hours per Employee

#### 7.2.1. Definitions

This metric records the total number of training hours per headcount across the reporting year. Training hours are any hours which employees have taken for training courses assigned by MFG and include Health Safety Executive (HSE) courses, Human Resources (HR) legal compliance courses and Information Technology (IT) compliance courses. Self-enrolled courses are not included.

An employee refers to a person employed by Motor Fuel Limited, St Albans Operating Company Ltd or CD&R Firefly Bidco Ltd on a permanent basis at any point during the reporting period.

Total employee is calculated as an average of all employees across the year, removing the average of Channel Island staff.

## 7.2.2. Data gathering

### **HR & IT compliance**

All HR and IT compliance training is managed by the HR team via an online training platform (Go1). Reports are exported from the system by the HR team.

Training is only marked as completed once employees have completed and exceeded the required pass mark for the training. The time taken to complete each course is estimated based on information provided by the training provider. Where course duration is not available, each course is estimated to take 15 minutes to complete.

# **HSE training**

HSE training is managed by the HSE team on the Integrated Management System (IMS) staff training matrix as per ISO IMS requirements. This matrix includes all in person training, IMS policy trainings which are distributed by Go1 and all training done via the CPL elearning platform.

The time taken to complete each course is estimated based on information provided by the training provider. Where course duration is not available, each Go1 course is estimated to take 15 minutes to complete, and each CPL course is estimated to take 1 hour to complete. The length of in person training varies depending on the course provider and the type of course and will be estimated based on information provided by the training provider.

Total training hours figures for HR, IT and HSE are compiled on a monthly basis.

# 7.2.3. Final calculations

The formula for calculating total number of training hours per headcount is:

(Total number of training hours of all employees - total number of training hours of all Channel Island employees) / (average headcount – average headcount of all Channel Island employees)

### 8. HSE metrics

## 8.1. Confirmed Litres of Fuel Lost to Ground

This metric calculates the total confirmed litres of fuel lost to ground across the reporting year. Fuel lost to ground is defined as any fuel that is confirmed to have leaked from an MFG tank. The definition excludes minor droplets that may fall from the fuel pump during customer refuelling.

MFG engages a third-party specialist contractor (Fairbanks) to remotely monitor all tanks. Their system includes several Real Time Rec (RTR) alarms, which may be triggered under various circumstances. These alarms can indicate a potential tank leak but could also relate to other events such as theft or a faulty gauge. To verify whether it is a tank leak, Fairbanks carries out checks using a continuous reconciliation tool to determine the cause of the alarm.

If a leak is suspected, an investigation will be opened in relation to the tank. If a leak is confirmed, Fairbanks prepares and submits a summary report to MFG, which includes a quantification of the amount of fuel lost to ground. Accurately quantifying the volume of fuel lost to the ground is challenging due to the thermal expansion properties of fuel. As temperatures fluctuate, fuel expands and contracts, causing the same mass to occupy a larger volume at higher temperatures and a smaller volume at lower temperatures. Fairbanks carries out a quantification of these losses based on the following process:

- Review typical tank performance and historical variances prior to the leak/loss incident
  - If the leak occurred at the fill point, review delivery day data
  - o If unrelated to the fill point, ensure typical delivery day variances are accounted for
- Adjust for known variance caused by poor tank calibration, based on historical tank performance
- Account for any changes in temperature that may impact fuel volume
- Conduct peer to peer analysis by evaluating volume loss and performance of the affected tank against similar tanks that receive fuel from the same terminal and are located at comparable distances
- Review and validate meter settings, if available, and exclude from quantification

## 8.1.1. Data gathering

All aforementioned details relating to leaks are documented by Fairbanks over the course of analysing a leak, and are then logged on the internal data platform CPL. The confirmed litres of fuel lost to ground in a particular leak is provided directly from Fairbanks, and the total over the course of the reporting period is obtained from Fairbanks.

### 8.1.2. Final calculations

The total number of litres lost to ground over the reporting year are obtained and summed from Fairbanks.

# 8.2. Employee accident rate per 200,000 hours worked

#### 8.2.1. Definitions

This metric calculates the number of accidents per 200,000 hours worked across the reporting year. Accidents are any events which result in injury or ill health as per the Health and Safety Executive (HSE).

An employee refers to a person employed by Motor Fuel Limited, St Albans Operating Company Ltd or CD&R Firefly Bidco Ltd on a permanent basis at any point during the reporting period. This metric does not include contract managers and other site staff, as they are not employed by MFG, and does not include Channel Island employees.

#### 8.2.2. Data gathering

The CPL online portal is used for reporting a range of incidents, including accidents, which are logged by employees. Data for all incidents is exported from this online platform and any classified as accidents are pulled into an injury rate data tab to ensure only accidents are captured.

#### 8.2.3. Final calculations

The formula for calculating the employee accident rate per 200,000 hours worked is: (Total number of accidents  $\div$  (average headcount  $\times$  annual working hours per employee))  $\times$  200,000 hours worked

Annual working hours per employee is calculated to be 1,816 hours, this is worked out by:

- 52 weeks × 5 days = 260 days
- 260 days 33 days (holiday allowance and bank holidays) = 227 days
- 227 days × 8 working hours = 1,816 hours

Note, 8 working hours per day allows for assumed overtime.

### 9. EV metrics

# 9.1. Total Number of Live EV charging units

## 9.1.1. Definitions

This metric records the number of EV charging units that are considered operational across MFG operated locations as per the Salesforce platform. Live charging units are defined as EV charging units which are located on site, operational and able to be used by customers.

#### 9.1.2. Data gathering

Salesforce (the CRM for MFG EV Power) contains a record of the number and status of chargers at the point the delivery note is generated. There are a number of different labels used to manage the status of the chargers on Salesforce. When the delivery note is received the asset will be allocated to the 'in transit' status. Upon arrival at the site, the status is changed to 'provisioned'. Only when a charger is installed and commissioned for use is it considered as 'live'. If chargers are removed or decommissioned, they are labelled as 'denetworked'. Once 'live' the status of the charger will not change unless it is denetworked for use. Where there is downtime in a charging unit, this does not affect its 'live' status.

#### 9.1.3. Final calculations

The number of chargers recorded as operational are exported from the Salesforce platform and totalled based on their go live date.

#### 9.2. Total number of kWh sold

#### 9.2.1. Definitions

This metric covers the total kWh sold to customers through the total number of live EV charging units across the MFG sites.

#### 9.2.2. Data gathering

The number of kWh sold is recorded through the "Driivz" software platform which contains CDR (Charging Detail Records). The platform records all EV Charger transactions (sale of kWh) including start stop times, kWh amounts, transactional references etc. This data can be exported from the Driivz platform. The raw log sent by a specific charger (containing minute by minute meter logs) can be sourced. This includes incoming and active power. All transactions are reconciled on a daily basis by the finance team. Any queries are raised to the EV Operations team for investigation and further analysis.

#### 9.2.3. Final calculations

The total number of kWh sold is the total of kWh sold for the year exported from the Driivz platform.

# 9.3. Reliability of EV chargers

#### 9.3.1. Definitions

This metric is set by the UK government's Public Charge Point Regulations 2023, which requires public EV charge points to maintain 99% reliability (meaning they must be operational 99% of the time on average annually). It also sets out a specific calculation for reporting the metric.

The metric is measured as an average (mean) across a charge point operator's rapid network of public charge points of 50kW and above over the calendar year. Reliability is measured through electric vehicle supply equipment (EVSE) object statuses using the Open Charge Point Interface protocol (OCPI) as the mandated data stated within the regulations.

Rapid charging – Rapid Chargers are defined as delivering power levels of 50 kW or more

**Ultra rapid charging** – Ultra Rapid Chargers are defined as delivering power levels of 150 kW or more, with MFG Ultra Rapid Chargers having the capability to deliver power within a range of 150 kW to 400 kW.

A charge point (as a unit) is defined at a connector level. MFG Chargers have 2 Connector types

- CCS2
- CHAdeMO

**OCPI statuses** - Uptime, downtime and exempt scenarios are defined below.

Table 11. Uptime, downtime and exempt scenarios from the UK government's Public Charge Point Regulations 2023

Uptime Scenarios				
EVSE object status	Description	Interpretation		
AVAILABLE The EVSE/connector is		The EVSE/connector is able to start a new		
	able to start a new	charging session and there are no faults that		
	charging session	would inhibit the operation of the charge point,		
		including the ability to pay for a charge via		
		contactless		
CHARGING	The EVSE/Connector is in	A charging session is underway and there are		
	use	no faults that would inhibit the operation of the		
		charge point, including the ability to pay for a		
		charge via contactless		
RESERVED	The EVSE/Connector is	The EVSE/Connector is reserved for a		
	reserved for a	particular EV driver and is unavailable for other		
	particular EV driver and is	drivers. There are no faults that would inhibit		
	unavailable for other	the operation of the charge point, including the		
	drivers	ability to pay for a charge via contactless		
Downtime Scenarios				
EVSE object status	Description	Interpretation		
INOPERATIVE	The EVSE/Connector is	The charge point is temporarily not available		
	temporarily not available	for use, due to an error that is inhibiting the		
	for use, but not broken or	operation of the charge point, including the		
	defective	ability to pay for a charge via contactless. This		
		would typically be due to a software related		
		issue. This includes the malfunctioning of the		

		communications equipment attached to the charge point	
OUTOFORDER	The EVSE/Connector is currently out of order, some parts/components may be broken/defective	The charge point is currently out of order. This would typically be due to a hardware related issue, such as a broken or defective component, that is inhibiting the operation of the charge point. This includes the ability to pay for a charge via contactless.  This includes any broken or defective communications hardware attached to the charge point	
Exempt Scenarios			
EVSE object status	Description	Interpretation	
BLOCKED	The EVSE/Connector is not accessible because of a physical barrier	There is an evidenced blockage to the charge point. This could include roadworks, road closures, a vehicle or any other scenario outside of the charge point operator's control that directly blocks access to the charge point. This also includes planned regular maintenance, which must not be in relation to a fault, and must be evidenced	
PLANNED	The EVSE/Connector is not yet operational but there is a date from which it will be made available	This status must only be used before the charge point becomes available to the public for the first time and should not be used after that point. Once the charge point is operational this status must not be used	
REMOVED	The EVSE/Connector was discontinued/ removed or has otherwise ceased to operate	used for maintenance/repair or for any other temporary outage. Once a charge point status is set to "removed" it must not be changed to another status	
UNKNOWN	No status information available (also used when offline)	CPOs may use this status in the event that an exceptional circumstance outside of the CPO's control has been identified. This could include a power grid or communication network failure, vandalism or severe flooding. All such events must be appropriately evidenced in the charge point operator's annual reliability report.  If, based on this evidence, OPSS deems that on the balance of probabilities this meets the standard for a 'reasonable excuse', they can take a decision to exempt the CPO from	

penalties. This status should not be used for
charge point hardware or software faults that
would be covered by the OUTOFORDER or
INOPERATIVE statuses

## 9.3.2. Data gathering

The status of EV chargers is exported from the Driivz platform. An excel spreadsheet is used to ascertain actual uptime, downtime and exempt figures based on the data from Driivz. The time a connector spends in each phase is converted into minutes. The statuses are included within uptime, downtime and exempt as per the government definitions above.

There are 2 scenarios in which MFG manually overrides the data from Driivz, as outlined below:

- 1. Where a single bay is equipped with multiple connectors (up to three connectors): when one connector is in use the other/s will appear as unavailable. As this is not reflective of actual unavailable time, the data for this charging bay is manually adjusted to remove any unavailable time which arises when another connector is in use.
- 2. When a dual bay is equipped with a three connector charger: when 2 connectors are in use the third connector will appear as unavailable. As any combination of two out of the three connectors could be in use at any given time, any unavailable time for these dual bay chargers is manually excluded. There are very few instances of this charger type across the network, so it was deemed as a negligible variance when calculating reliability of the entire network

The final downtime number accounts for all the scenarios listed above to reflect the updated unavailable time. Quality checks are carried out based on total time uptime and downtime status of each charger equalling 1440 minutes (1 day) for the 24 hour period, any values above or below are investigated.

#### 9.3.3. Final calculations

The formula for calculating the reliability of a charge point operator's network is: Reliability  $\% = (((M - mean time exempt) - mean downtime) \div (M - mean time exempt)) \times 100$ 

### Where:

- M is the number of minutes in a year
- mean time exempt is calculated as the total minutes that charge points across the network are ineligible from measurement, divided by the number of charge points
- mean downtime is calculated as the total minutes that charge points across the network are not working, divided by the number of charge points