

# **BENTLEY MOTORS LIMITED**

## **Qualifying Explanatory Statement in support of the Achievement of and ongoing commitment to carbon neutrality**

Application Period: 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024

**Date:** 26/03/2025

# 1. Executive Summary

This document is the Qualifying Explanatory Statement (QES) which provides collected evidence in support of the declaration that Bentley Motors Limited:

1. has achieved carbon neutrality for its UK Operations for the period commencing 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024 (see Section 3); and
2. is committed to maintaining carbon neutrality for its UK Operations (see section 4).

The carbon neutrality declaration has been made and the collected supporting evidence has been provided in accordance with the requirements prescribed by PAS 2060:2014 – Specification for the demonstration of carbon neutrality.

Andrew Robertson

Head of Site and Facilities Planning

## 2. General information

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Entity making PAS 2060 declaration:</b>	Bentley Motors Limited (BML)
<b>Subject of PAS 2060 declaration:</b>	UK Operations <i>The Bentley Motors Limited site is situated on Pyms Lane, Crewe and Service Parts Distribution Centre on Orion Park, Crewe in Cheshire. The site includes vehicle manufacturing and test areas, development offices and all associated supporting teams. Additionally, four satellite sites for Sales and Marketing, Car Scheme, Storage and Chief Executive along with all business-related travel are included in this declaration. Voluntary emissions have been included in relation to Working from Home (WFH).</i>
<b>Description of Subject:</b>	Bentley Motors Limited is a manufacturer and developer of high-quality luxury cars. Bentley Motors Limited has around 4,679 employees based in the Pyms Lane headquarters and local satellite sites.
<b>Rationale for selection of the subject:</b>	The subject was selected given it represents the operational control boundary of BML as defined by The UK Government Environmental Reporting Guidelines (including streamlined energy and carbon reporting guidance). The boundary for 2024 includes all the emissions required to be disclosed by unquoted large companies according to the above standard, namely:  Scope 1 emissions - Combustion of gas

	<ul style="list-style-type: none"> <li>- Combustion of Biogas</li> <li>- Combustion of fuel for transport purposes</li> </ul> <p>Scope 2 emissions</p> <ul style="list-style-type: none"> <li>- Purchased electricity (location and market-based)</li> </ul> <p>Scope 3 emissions</p> <ul style="list-style-type: none"> <li>- BML have expanded the scope 3 requirements over the original baseline in line with our commitments. These include all air and rail business travel, global car hire and business mileage.</li> </ul> <p>Voluntary Emissions</p> <ul style="list-style-type: none"> <li>- Working from Home</li> </ul> <p>For further information and justification behind the choice of the standard please see Section 4.</p>
<b>Control approach:</b>	Operational Control
<b>Type of conformity assessment:</b>	Independent third-party certification (see Appendix 2)
<b>Baseline date for PAS 2060 programme:</b>	1st January 2018 – 31st December 2018
<b>Individuals responsible for evaluation and provision of data necessary for declaration:</b>	<p>Darren Oakes: Environmental &amp; CDM Functional Manager</p> <p>Alexander Hadfield: Environmental Engineer</p>

### 3. Declaration of achievement to carbon neutrality

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Declaration of achievement:</b>	Carbon neutrality of UK Operations achieved by Bentley Motors Limited in accordance with PAS 2060 in March 2025 for the period commencing 01/01/2024 and ending 31/12/2024, certified by the LRQA.
<b>Recorded carbon footprint of the subject during the period stated above</b>	<p>28,416.78 (tCO<sub>2</sub>e) Location Based (see section 3.2 - Voluntary)</p> <p>2.53 (tCO<sub>2</sub>e/veh) Location Based (see section 3.2 – Voluntary)</p> <p>8,831.29 (tCO<sub>2</sub>e) Market Based (see section 3.2 - Voluntary)</p> <p>0.79 (tCO<sub>2</sub>e/veh) Market Based (see section 3.2 – Voluntary)</p> <p>See section 3.2 for further details.</p>
<b>Recorded carbon footprint of the subject during the previous period</b>	<p>30553 (tCO<sub>2</sub>e) Location Based (see section 3.2 - Voluntary)</p> <p>2.31 (tCO<sub>2</sub>e/veh) Location Based (see section 3.2 – Voluntary)</p> <p>9789 (tCO<sub>2</sub>e) Market Based (see section 3.2 - Voluntary)</p> <p>0.74 (tCO<sub>2</sub>e/veh) Market Based (see section 3.2 – Voluntary)</p>

	See section 3.2 for further details.
<b>Carbon offsets purchased</b>	9000 (tCO <sub>2</sub> e) See Annex 3 for further details.

### 3.1. Carbon footprint methodology

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Description of the standard and methodology used to determine GHG emissions and reductions</b>	<p>The methodology was developed to be in accordance with the requirements of The UK Government Environmental Reporting Guidelines (Including streamlined energy and carbon reporting guidance) for unquoted large companies and was used to measure the GHG emissions and reductions of BML's UK Operations in this certification. The methodology is to Measure, Reduce, Offset and Document &amp; Validate. This methodology is aligned with the WBCSD/WRI GHG Protocol, Corporate Accounting and Reporting Standard (which was used in the first PAS2060 certification of the Subject) in the way emissions sources are categorised. All the emission sources from the previous certification were calculated in the same way and were included in this certification, therefore a re-baselining calculation was not needed. It continues to include local satellite sites and employee travel on planes, trains, and global car hire (Scope 3) as additional emission sources included within the boundary of the footprint for this year. This is in line with BML's ongoing commitment to assess and address those Scope 3 emission sources that are technically feasible, and cost-effective, to quantify in future certifications.</p> <p>The chosen methodology also provides updated guidance on dual-reporting (e.g., location and market-based) for gas consumption and how to account for "green gas". This was directly relevant to the BML given that the procurement of Renewable Gas Guarantee of Origins (RGGOs) was one of the main planned means of reducing GHG emissions for this certification. Data from GHG emissions sources contributing over 90% of the footprint was obtained via direct metering or derived from fuel consumption, with UK Government emissions factors applied.</p> <p>Emissions factors used in the calculations are sourced from- <a href="#">Greenhouse gas reporting: conversion factors 2024 - GOV.UK</a></p> <p>The provisions of the methodology for calculating the carbon footprint were applied as detailed and the principles set out in PAS 2060 were met. This allows for a high confidence in the data.</p>
<b>Justification for the selection of the methodologies chosen</b>	<p>The rationale for choosing the UK Government Environmental Reporting Guidelines is that its methodology is robust and is prescribed as appropriate for use in the quantification and reduction of GHG emissions for the purpose of achieving Carbon Neutral Certification to the PAS 2060: 2014 Specification for the demonstration of carbon neutrality.</p>

	<p>Data sources have been reviewed through third-party verification. These sources are also subject to regular review, and analysis, along with internal and external auditing to support our ISO140001 and 50001 certification, and include:</p> <p>Scope 1: Natural gas, biogas, oil, diesel, petrol and fugitive emissions. Energy data has been recorded, through metering, invoicing and refrigerant maintenance records to determine accurate footprint data.</p> <p>Scope 2: Electricity, recorded through half-hourly metering with appropriate market-based consideration under renewable electricity procurement contracts. Source of data is primary and from invoices and meter reads.</p> <p>Scope 3: Business Travel, Rail, Grey fleet, Air Travel (and voluntary working from home emissions), business travel is calculated based on expense records which include the mileage, this mileage is multiplied out by the appropriate emissions factor. Rail and air travel reports are received monthly from a subcontracted business travel management company and the CO2 is precalculated directly on the reports using the GHG/DEFRA emissions factors. The grey fleet data is supplied by Bentleys in house travel management team in the different forms either actual miles travelled or cost of claim. Where a cost is provisioned the average cost of fuel from the pump over the course of the year is derived from the following source-  <a href="https://www.gov.uk/government/statistics/weekly-road-fuel-prices">https://www.gov.uk/government/statistics/weekly-road-fuel-prices</a></p> <p>The cost is then divided by the total claim amount to give a total distance travelled. This total distance is then split 50/50 for petrol and diesel, both of these values are then have the appropriate emissions factor applied to give the emissions.</p> <p>Emissions factors used in the calculations are sourced from- <a href="#">Greenhouse gas reporting: conversion factors 2024 - GOV.UK</a></p> <p>Work From Home emissions are based on the number of employees working from home on average per week and the UK Standard total emissions for a year supplied by a report compiled by the Carbon trust and Vodaphone.</p> <p>BM excluded the product level quantification and the emissions which are not under our control.</p>
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### 3.2. Carbon footprint

Carbon Footprint <i>(for latest footprinting year)</i>	Information Relating to the Carbon Neutral Declaration
<b>Total Carbon Footprint</b>	<b>Location-based:</b> 28,416.78 tCO <sub>2</sub> e <b>Intensity split:</b> 2.53 tCO <sub>2</sub> e/veh

	<b>Market-based:</b> 8,831.29 tCO <sub>2</sub> e <b>Intensity split:</b> 0.79 tCO <sub>2</sub> e/veh See Annex 1 for further details.
<b>Carbon Footprint Breakdown by Scope</b>	<b>Location-based:</b> Scope 1: 14,430.30 tCO <sub>2</sub> e Intensity split: 1.29 tCO <sub>2</sub> e/veh Scope 2: 7,209.02 tCO <sub>2</sub> e Intensity split: 0.64 tCO <sub>2</sub> e/veh Scope 3: 6,108.90 tCO <sub>2</sub> e Intensity split: 0.54 tCO <sub>2</sub> e/veh Voluntary: 668.56 tCO <sub>2</sub> e Intensity split: 0.06 tCO <sub>2</sub> e/veh <b>Market-based:</b> Scope 1: 2,050.59 tCO <sub>2</sub> e Intensity split: 0.18 tCO <sub>2</sub> e/veh Scope 2: 3.24 tCO <sub>2</sub> e Intensity split: 0.00029 tCO <sub>2</sub> e/veh Scope 3: 6,108.90 tCO <sub>2</sub> e Intensity split: 0.54 tCO <sub>2</sub> e/veh Voluntary: 668.56 tCO <sub>2</sub> e Intensity split: 0.06 tCO <sub>2</sub> e/veh See Annex 1 for further details. <b>Voluntary:</b> Working from home emissions, BML has included these emissions which have been verified by LRQA - (668.56 tCO <sub>2</sub> e)

### 3.3. Carbon reduction

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Reductions achieved</b>	<p>The carbon footprint reductions between the current carbon footprint (see section 3.2) and the baseline period are as follows:</p> <ul style="list-style-type: none"> <li>• Absolute reduction: 8,651 tCO<sub>2</sub>e</li> <li>• Intensity reduction: 0.42 tCO<sub>2</sub>e / vehicle</li> <li>• Percentage absolute reduction: -49.48 %</li> <li>• Percentage intensity reduction: -14.10 %</li> </ul> <p>The carbon footprint reduction between the current carbon footprint (see section 3.2) and the previous year of 2023 are as follows:</p> <ul style="list-style-type: none"> <li>• Absolute reduction: 957 tCO<sub>2</sub>e</li> <li>• Intensity reduction: -0.22 tCO<sub>2</sub>e / vehicle</li> <li>• Percentage absolute reduction: -9.78%</li> </ul>

	<ul style="list-style-type: none"> <li>Percentage intensity reduction: 9.72%</li> </ul>
<b>Baseline period</b>	2018
<b>Confirmation that there has been no change to the definition of the subject</b>	The subject of this assessment is confirmed as unchanged and that Bentley Motors Limited will continue with their core business as a manufacturer of vehicles
<b>Description of the means by which reductions have been achieved and any applicable assumptions or justifications</b>	<p>Bentley Motors Limited has adopted a market-based approach. The market-based footprint in the baseline period amounted to 17,482 tCO<sub>2</sub>e. As part of the targets set for BML ongoing neutrality programme, reductions of 8,651 tCO<sub>2</sub>e were achieved during the period 01/01/2024-31/12/2024, lowering the market-based footprint to 8,831.29 tCO<sub>2</sub>e including the aforementioned scope 3 emissions (There were no additional Scope 3 emissions included in the 2018 baseline). These reductions were primarily driven by internal reductions, procurement of ReGo certified renewable electricity and procurement of RGGO certified Green Gas.</p> <p>Additionally, historical emission activity to date is summarised below.</p> <p>BML has undertaken various activities, in line with our own and Parent Companies (VW Group) targets, relating to climate change. BML will continue to act to reduce our Greenhouse Gas emissions over time. Our website section 'Bentley and the Environment' and 'Responsible Manufacturing' publicly document our achievements to date.</p> <p>Some of BML's significant achievements relating to our Carbon Footprint are detailed below:</p> <ul style="list-style-type: none"> <li>○ First automotive manufacturer to be certified to the ISO 14001 Environmental Management System in 1999 and has been renewed since.</li> <li>○ First Automotive manufacturer to be certified to the ISO 50001 Energy Management standard in 2011 and has been renewed since.</li> <li>○ Carbon Trust 'Carbon Standard' certified 2012 – 2022.</li> <li>○ Carbon Trust 'Route to Net Zero' certified since 2022.</li> <li>○ 100% ReGo certified electricity purchase since 2017.</li> <li>○ Introduction of 5MW Solar array on site roof space in 2013, subsequent 2.7MW Solar Array on the carpark installed 2018 and an additional 2.16MW Solar Array on new buildings in 2023.</li> <li>○ Replacement of boilers completed at the end of 2018. Power consumption reduced from 5 x 12MW to 3 x 5.5MW.</li> <li>○ 100% RGGO certified gas purchase since Oct 2019.</li> <li>○ Continual rollout of LED lighting and Auto Detection controls across the Campus.</li> <li>○ Continual baseload monitoring and optimisation.</li> <li>○ Set the heating temperature to 18C across Campus in all areas.</li> <li>○ Transition of Maintenance and Security vehicles from Internal Combustion Engines to Battery Electric Vehicles.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Control measure and monitoring employed to assess carbon performance in the form of consumption and baseload reviews.</li> <li>○ All data is internally audited for GHG in accordance to ISO14001/50001.</li> <li>○ All Bentley colleagues have undertaken information, instruction and training on CO<sub>2</sub>. Including its impact and what people can do to mitigate CO<sub>2</sub> emissions in the workplace in the form of web based training or local briefings.</li> </ul>
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### 3.4. Carbon offsets

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Offset methodology</b>	The project which has been chosen for this verification- Salkhit Wind Farm . This is a Gold Standard project and credits have been purchased and surrendered through VW Kraftwerk.
<b>Offset Confirmation</b>	<p>The offsets generated represent genuine, additional GHG emission reductions elsewhere. Projects involved in delivering offsets meet the criteria of additionality, permanence, leakage and double counting.</p> <p>Carbon offsets are verified by an independent third-party verifier.</p> <p>The credits from the selected carbon offset projects are:</p> <ul style="list-style-type: none"> <li>• only issued after the emission reduction has taken place.</li> <li>• retired within 12 months from the date of the declaration of achievement.</li> <li>• supported by publicly available project documentation on a registry which provides information about the offset project, quantification methodology and validation and verification procedures.</li> <li>• stored and retired in an independent and credible registry.</li> </ul>
<b>Offsets</b>	Full details of the carbon offsets included in making this declaration are provided in Annex 3. BML have purchased offsets to cover their verified footprint as well as unverified voluntary emissions.



## 4. Declaration of ongoing commitment to carbon neutrality

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<b>Declaration of on-going commitment:</b>	<p>Bentley Motors Limited commits to maintain carbon neutrality for UK Operations in accordance to PAS 2060 for the period up to and including 31/12/2025.</p> <p>Carbon neutrality for UK Operations for the period up to and including 31/12/2025 will be achieved by May 2026.</p>

### 4.1. Carbon management plan

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Targets for GHG reduction for the defined subject appropriate to the timescale for achieving carbon neutrality	<ul style="list-style-type: none"> <li>○ Bentley has committed that by 2025 there will be a reduction of 75% tCO<sub>2</sub>e emissions over a baseline year of 2010</li> <li>○ As evidenced in this statement, significant improvements have already been made, and continual improvements will continue leading to small further reduction and achieving the target point in 2025.</li> </ul>
Planned means of achieving and maintaining GHG emissions reduction	<p>On-going Emissions Reduction Plan – for the PAS 2060 Commitment Period (01/01/2018-31/12/2025). The on-going plan to reduce emissions over the commitment is summarised below:</p> <ul style="list-style-type: none"> <li>○ Bentley Environmental Management Manual which is designed to encourage energy efficiency</li> <li>○ Continued commitment to carbon neutral operations (Scope 1 and 2) up to and including December 2025</li> <li>○ The targets set for and achieved within this certification period were:</li> <li>○ Continuation of GreenGas certified BioGas for all on-site operations in 2024.</li> <li>○ Continuation of Environmental Mission Statement outlining 3 key action areas of Climate Change, Resources and Environmental Compliance</li> <li>○ Inclusion within VW AG's Science Based Target programme</li> <li>○ Certification to ISO 50001 (2018)</li> <li>○ Inclusion of above commitment into BML's 'Environmental &amp; Energy Policy Statement'</li> </ul> <p>Training of indirect Colleagues with 'Bentley Environmental Operations Awareness' which featured sections on Energy and Emissions.</p> <p>The following measures will be followed to assess performance against the plan.</p> <ul style="list-style-type: none"> <li>○ Achievement of Carbon Trust 'Route to Net Zero' certification, which requires emissions reductions</li> <li>○ Continuation of Environmental Objectives/Targets 2024 which are reviewed quarterly with Senior Management</li> </ul>

	<ul style="list-style-type: none"> <li>○ Continual improvement activities at a local level planned for 2025 onwards</li> <li>• Boiler house facility operational optimisation IE seasonal optimisation for time and temperature</li> <li>• Implementation of additional solar PV capacity</li> <li>• Facility optimisation LED lighting continuation</li> <li>• Facility optimisation Maintenance vehicle conversion to Electric</li> <li>• 100% Renewable 2<sup>nd</sup> Generation Biofuel tank installation to support local fleet requirements</li> <li>• Weather station installation to support wind energy unit trials.</li> </ul>
The offset strategy to be adopted	<p>VW Group hold a portfolio of Carbon Instruments in excess of the BML's requirement for the period.</p> <p>VW Group manage this portfolio on behalf of BML</p> <p>BML advise VW Group on the volume of carbon instruments that need to be retired to cover the operational emissions for that period</p> <p>Carbon Instruments relating to the application period 1st January 2024 - 31st December 2024 were retired in March 2025.</p>

# Annex of Qualifying Explanatory Statement

## Annex 1: Greenhouse gas emissions summary

### A1.1 Carbon footprint details

Information Relating to the Carbon Neutral Declaration					
Carbon Footprint			2018 (baseline year) (tCO <sub>2</sub> e)	2023 (previous period if different to baseline) (tCO <sub>2</sub> e)	2024 (application period) (tCO <sub>2</sub> e)
Total Carbon Footprint		Location-based:	27,661	30,553.16	28,416.78
		Market-based:	17,482	9,788.75	8,831.29
Carbon Footprint Breakdown by Scope	Scope 1 – Direct emissions:	Natural Gas:	-	LB: 13,415.53 MB: 0.00	LB: 12,409.94 MB:0.00
		Biogas:	-	LB:0.00 MB: 40.17	LB:0.00 MB: 30.24
		Fuels (owned vehicles):	-	LB: 2134.21 MB:2134.21	LB: 1,861.94 MB:1,861.94
		Fuels (stationary equipment):	-	LB: 8.77 MB: 8.77	LB: 24.29 MB: 24.29
		Fugitive emissions:	-	LB :314.82 MB:314.82	LB :134.12 MB:134.12
		Total:	17,482	LB: 15,873.3 MB: 2,497.97	LB: 14,430.30 MB: 2,050.59
	Scope 2 – Energy Indirect Emissions:	Location-based: Imported Electricity:	10,179	7404.07	7,209.02
		Market-based: Imported Electricity:	N/A	15.02	3.24
	Scope 3 – Other Indirect	Category 6 – Business travel	-	6638.52	6108.90

	<b>GHG Emissions:</b>				
	<b>Voluntary</b>	Working from home emissions	N/A	637.25	668.56

### A1.2 Methodology overview

Requirement	Information Relating to the Carbon Neutral Declaration
<b>Boundary of the product</b>	<ul style="list-style-type: none"> <li>This Declaration relates to Bentley's operations on the main Campus in Crewe and surrounding Satellite locations within the vicinity of Cheshire only. It does not include the motor car Products made at the Crewe Campus. This includes the business travel of the Bentley Colleagues along with voluntary Working From Home emissions.</li> </ul>
<b>Boundary of carbon footprint</b> (the greenhouse gas emissions system considered)	<ul style="list-style-type: none"> <li>The life cycle Carbon footprint boundary covered by this certification is the 'Manufacturing' stage including emissions from burning gas for Production Processes and heating, burning Hydrocarbons for testing motor car engines and back-up generators along with aircon gas losses based on GWP CO<sub>2</sub> equivalents.</li> </ul>

### A1.3 Geographical Areas of Emissions Overview:

Emissions Sources	Geographical Area
Bentley Motors Ltd Main Campus and surrounding Satellite Sites	Cheshire, United Kingdom

## Annex 2: Offsets

*The below information relates to the compensation of residual emissions (i.e. offsetting):*

*The volume of emissions reduced or sequestered via carbon offsetting corresponds to the residual emissions of the products in question. As per the requirements of PAS2060, it has been confirmed the offsets have been retired on a public registry to avoid double accounting. The internal process for ensuring there is no double accounting of offsets is as follows:*

*- We work with VW Kraftwerk who manage the procurement and retirement of offsets on Bentley Motors behalf. Bentley Motors provide the number of offsets required for purchase based off emissions calculations and purchase a set number of offsets through VWK who send through a single contract. This is an Individual contract under a framework agreement on Procurement, holding and validation of CO2 compensation certificates between the Bentley and VWK. This details the number of offsets to be purchased, related project and timeframe for retirement, which is signed by both Bentley and VWK representatives. Once signed by both parties the offsets are retired and a certificate of retirement is sent through to Bentley from VWK.*

Project name	Country	Project type	Standard	Type of credits	Total credits	Generation period	Retirement date	Reference No. & link to registry	Offset volume (tCO <sub>2</sub> e)	Offset Price	Justification for choice of offset
GS 11561-Salkhit Wind Farm	Mongolia	Wind Farm	Gold Standard	Verified Emissions Reductions	9000	24 <sup>th</sup> June 2020-23 <sup>rd</sup> June 2025	25/03/2025	<a href="#">GSF Registry</a>	9000	€10.78/tCO <sub>2</sub> e	Offsets chosen due to them being certified Gold Standard offsets investing in an internationally recognised renewable energy project
Total tonnes (tCO <sub>2</sub> e) offset									9000		



*We are delighted to confirm the retirement of*  
**9000 Verified Emission Reductions (VERs)**  
*by*  
**Retirement Bentley**  
*on 25/03/2025*

These credits were retired on behalf of Bentley Motors Ltd..

Project: Salkhit wind farm

*These credits have been retired, saving **9000** tonnes of CO2 emissions  
from being released into the atmosphere.  
Thank you for investing in a safer climate and more sustainable world.*

[View retirement](#)

**Gold Standard**

Retirement certificates are hosted on the Gold Standard Impact Registry, [view your certificate](#).

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## Annex 3: Independent third-party assurance



### LRQA Independent Assurance Statement

Relating to Bentley Motors Limited's Carbon Neutrality commitment for Calendar Year 2024

This Assurance Statement has been prepared for Bentley Motors Limited in accordance with our contract.

#### Terms of Engagement

LRQA was commissioned by Bentley Motors Limited (BML) to provide independent assurance of its Qualifying Explanatory Statement ("the Report") in support of the achievement of and ongoing commitment to carbon neutrality for the calendar year 2024 against the assurance criteria below to a reasonable level of assurance and materiality of the professional judgement of the verifier using LRQA's verification procedure. LRQA's verification procedure is based on current best practice and is in accordance with ISAE 3000 and ISAE 3410.

Our assurance engagement covered BML's operations and activities at its main campus and satellite locations in Cheshire, United Kingdom and specifically the following requirements:

- Verifying conformance with:
  - PAS 2060:2014 Specification for demonstration of carbon neutrality, and
  - BML's reporting methodologies for the selected datasets.
- Evaluating the accuracy and reliability of data and information for only the selected indicators listed below:
  - Direct (Scope 1) and Energy Indirect (Scope 2) greenhouse gas (GHG) emissions, and
  - Other Indirect (Scope 3) GHG emissions:
    - Business Travel
    - Working from Home voluntary emissions

Our assurance engagement excluded the data and information of BML's product level quantification, the operations not under BML's control, and the verification of the baseline period calendar year 2018.

LRQA's responsibility is only to BML. LRQA disclaims any liability or responsibility to others as explained in the end footnote. BML's responsibility is for collecting, aggregating, analysing and presenting all the data and information within the Report and for maintaining effective internal controls over the systems from which the Report is derived. Ultimately, the Report has been approved by, and remains the responsibility of BML.

#### LRQA's Opinion

Based on LRQA's approach, we believe that BML has, in all material respects:

- Met the requirements of criteria listed above; and
- Disclosed accurate and reliable performance data and information as summarized in Table 1 below.

The opinion expressed is formed on the basis of a reasonable level of assurance and at the materiality of the professional judgement of the verifier.

**Table 1. Summary of BML's GHG Emissions and Removals for Calendar Year 2024:**

Scope of GHG emissions	Location-based Tonnes CO <sub>2</sub> e	Market-based Tonnes CO <sub>2</sub> e
Scope 1 – emissions from combustion of gas	12,409.95	30.24
Scope 1 – emissions from the combustion of fuel from BML-owned transport and mobile equipment	1,861.94	1,861.94
Scope 1 – emissions from the combustion of fuel in stationary equipment and engine testing	24.29	24.29
Scope 1 – emissions from refrigerant-containing systems	134.12	134.12
Scope 2 – emissions from purchased electricity	7,209.02	3.24
Scope 3 – emissions from business travel by air and rail	5,938.30	5,938.30
Scope 3 – emissions from business travel in rental or employee-owned vehicles	170.61	170.61
Scope 3 – emissions from home working	668.56	668.56
Total emissions for Calendar Year 2024	28,416.78	8,831.29
Total emissions offset using credits from Gold Standard Voluntary Carbon Standard project	-	9,000
<i>Note 1: Scope 1, Scope 2, Scope 3, Location-based and Market-based are defined in the GHG Protocol Corporate Accounting and Reporting Standard.</i>		

### LRQA's Approach

LRQA's assurance engagements are carried out in accordance with our verification procedure. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- reviewing processes related to the control of GHG emissions data and records;
- interviewing relevant employees of the organization responsible for managing GHG emissions data and records;
- verifying GHG emissions data and records back to source for the calendar year 2024; and
- auditing BML's data management systems to confirm that there were no significant errors, omissions or misstatements in the Report. We did this by reviewing the effectiveness of data handling procedures, instructions and systems, including those for internal verification.

The Report includes a deduction from BML's emissions of X tonnes CO<sub>2</sub>e relating to offsets purchased equivalent to 9,000 tonnes CO<sub>2</sub>e. We have verified that these offsets were acquired and that their inclusion in the Report is reasonable. We have not performed any assurance procedures regarding the providers of these offsets and express no opinion on whether they have, or will, result in a reduction of CO<sub>2</sub>e.

### Observations

Further observations and findings made during the assurance engagement, are:

- BML should ensure that they receive Renewable Energy Guarantees of Origin confirmation at the end of each compliance period for that scheme;
- BML should consider improving internal data assurance processes to minimise errors at early stages; and
- BML could consider simplifying their calculation spreadsheet to minimise potential for data handling errors.





### **LRQA's Standards, Competence and Independence**

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 *Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and ISO/IEC 17021 *Conformity audit – Requirements for bodies providing audit and certification of management systems* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification audits is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

LRQA is BML's certification body for ISO 14001 and ISO 50001 environmental and energy management systems. The verification and certification audits are the only work undertaken by LRQA for BML and as such does not compromise our independence or impartiality.

Signed

Dated: XX February 2025

A handwritten signature in blue ink, appearing to read 'G Colebeck', is written over a light blue horizontal line.

Graham Colebeck  
LRQA Lead Verifier  
On behalf of LRQA  
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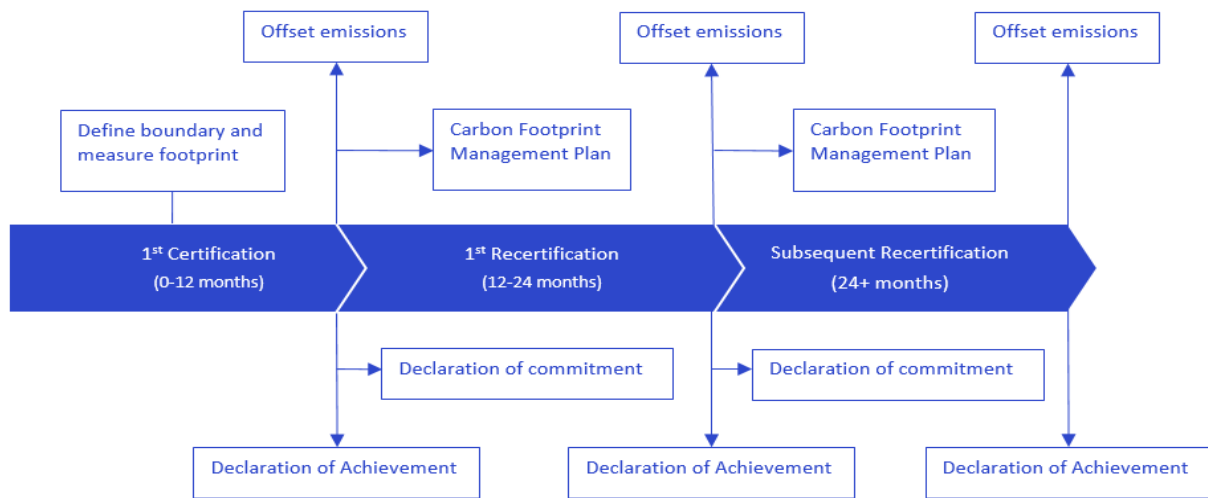
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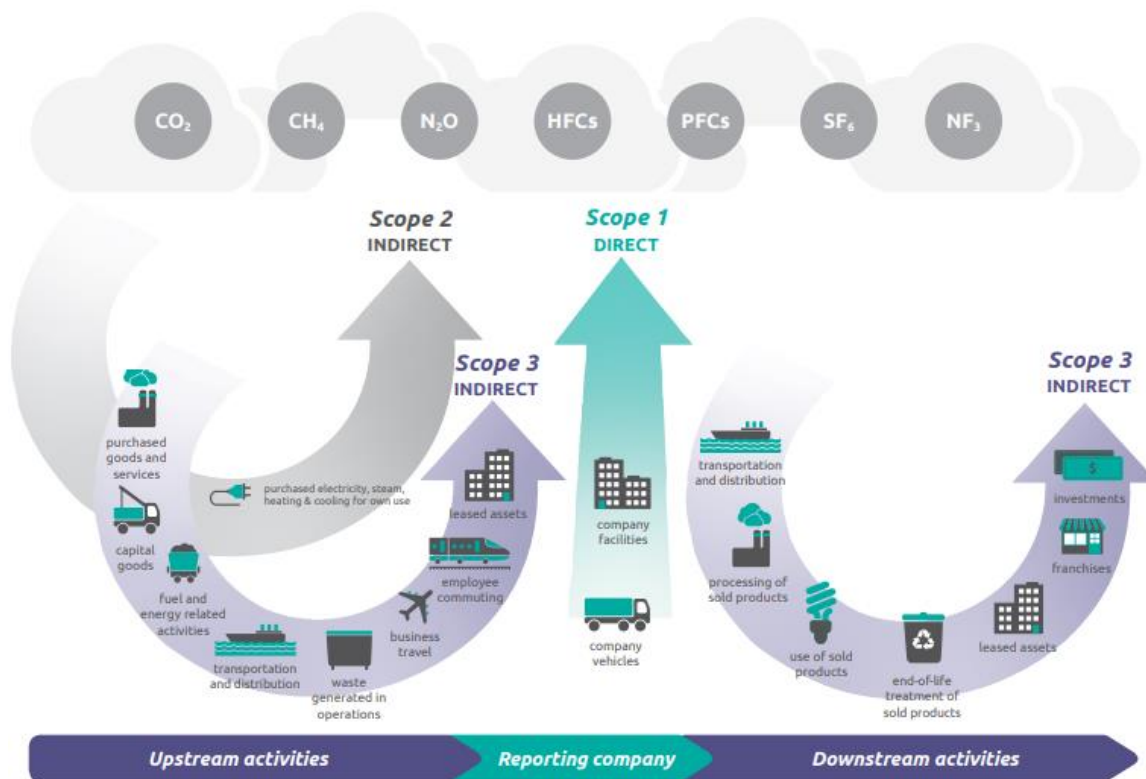
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## Annex 4: Additional supporting information for interested parties



**Figure 1. PAS 2060 certification process**

**Source:** Carbon Trust. Adapted from “BSI - PAS 2060:2014: *Specification for the demonstration of carbon neutrality: Figure 1 – Illustration of the cyclical process for demonstrating carbon neutrality, taking into account permitted baseline period exceptions*”. [Simplified version]



**Figure 2. Organisational carbon footprinting**

**Source:** Greenhouse Gas Protocol: <http://ghgprotocol.org/>