

Carbon Reduction Plan

Publication date: 30 September 2021

Commitment to achieving Net Zero

Comply Direct is committed to achieving Net Zero emissions by 2041

Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2019	
Additional Details relating to the Baseline Emissions calculations.	
Baseline emissions are calculated based on January-December 2019. All scope 1 and scope 2 (market-based) emissions are included, along with relevant scope 3 emissions.	
Baseline year emissions:	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	0
Scope 2	1.91
Scope 3 (Included Sources)	62.49 (Employee commuting, heating, water treatment and supply, waste disposal, business travel)
Total Emissions	64.4
Offsets purchased:	64

Current Emissions Reporting

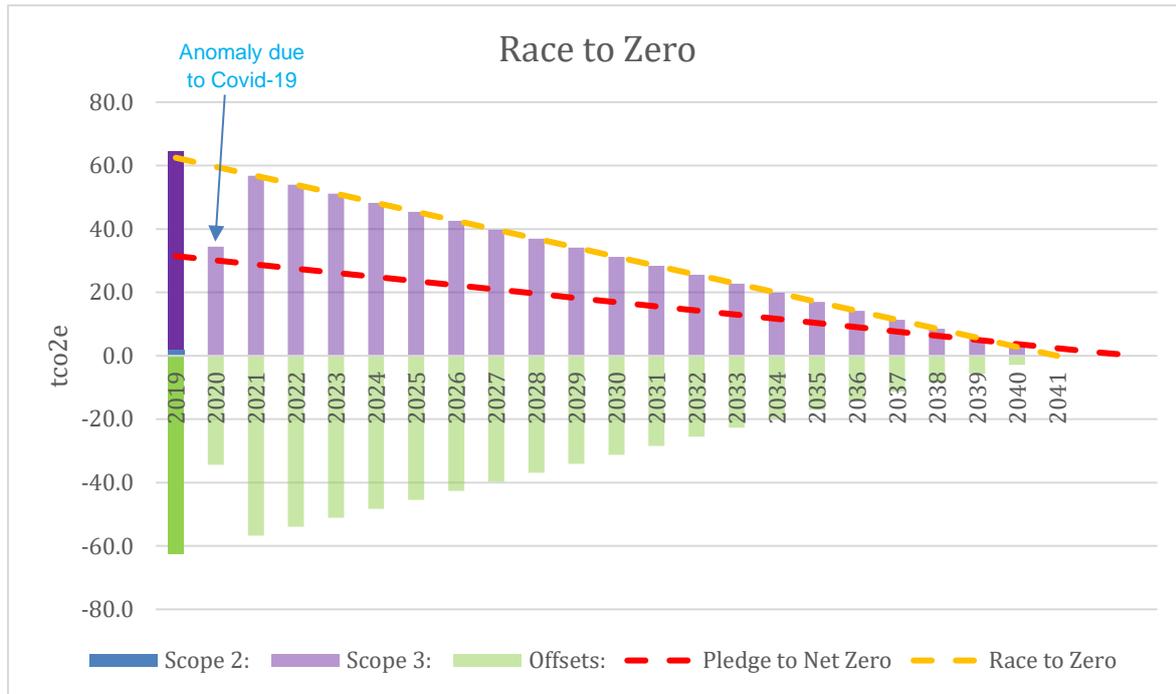
Reporting Year: 2020	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	0
Scope 2	0
Scope 3 (Included Sources)	34.39
Total Emissions	34.39
Offsets purchased:	37

Emissions reduction targets

In order to continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets.

We project that carbon emissions will decrease over the next five years to 45.45 tCO₂e by 2025. This is a reduction of 27% compared to the 2019 baseline year (comparison to baseline year as 2020 data is skewed due to Covid-19).

Progress against these targets can be seen in the graph below:



The graph above includes our pre-existing Pledge to Net Zero commitment, achieving Net Zero by 2043, with a 4.2% emissions reduction per year. We have now increased our ambition aiming to reach Net Zero by 2041, with a 4.55% reduction per year. This pathway achieves a 50% reduction in emissions by 2030, in line with the Race to Zero initiative requirements.

Comply Direct Ltd are a carbon neutral company. In 2020 we purchased 37 tCO2e of Verified Carbon Standard Offsets for projects which are reducing deforestation in the Amazon, as well as planting trees in both either the UK and Kenya for each tonne of CO2 offset.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

2020 was an unusual year due to Covid-19, which caused an overall emissions reduction of 47% compared to 2019. Business travel reduced by 79% and employee commuting by 52% due to the impact on travel and shift to homeworking. This has highlighted the ability to work from virtual offices and conduct meetings and visits virtually rather than in person, which we will continue to implement going forwards through the introduction of a new flexible working benefit. Covid-19 also forced a shift to a completely paperless office which has proved effective and significantly reduced our paper usage.

Market based electricity consumption decreased by 100% as green energy was purchased for the full year in 2020, which has been accounted for as zero emissions.

Throughout 2020 we set 2 objectives based on our largest contributing areas, both of which were met successfully, primarily due to Covid-19 but also as a result of having environmental policies in place, and an awareness of employees regarding best practice, as progress against objectives were reported on monthly in company meetings:

- To reduce the emissions per member (we refer to the majority our customers as members) by 10% from 2019 figure in 2020
- To reduce emissions from heating oil consumption per square foot of office space by 10% in 2020

In the future we hope to implement further measures such as:

- Removing our heating oil (Kerosene) system by 2025, working with the landlord to implement this
- Implement a car share/bike to work scheme
- Introduce incentives for employees to consider low carbon vehicles
- Begin tracking our employee commuting more accurately by collecting data on employees' vehicle and fuel types
- Work towards zero waste to landfill
- Set up a 'Net Zero' ambassadors network among the Comply Direct team to work towards these reduction goals

Declaration and Sign Off

Scope 1 and Scope 2 emissions have been reported in accordance with the Greenhouse Gas Protocol, and the required subset of Scope 3 emissions have been reported in accordance with the Corporate Value Chain (Scope 3) Standard¹.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed:

A handwritten signature in blue ink, appearing to read 'J. Sedes', written over a faint, large, light-colored signature line.

Date: 30 September 2021

¹ <https://ghgprotocol.org/standards/scope-3-standard>