

Organisational Carbon Footprint 2021

Comply Direct Ltd

Part 1: Descriptive Information

Descriptive information	Company response
Company Name	Comply Direct Ltd
Description of the company	Environmental compliance and consultancy
Chosen consolidation approach	Operational control
Description of the businesses and operations included in the company's organizational boundary	Comply Direct reports scope 1, scope 2, and selected scope 3 emissions from its only operational leased office site. There are no other companies in the group.
Reporting Period	1 st January 2021-31 st December 2021
A list of scope 3 activities included in the report	Category 5: Waste generated in operations Category 6: Business Travel Category 7: Employee commuting Category 8: Upstream leased assets
A list of scope 1, scope 2, and scope 3 activities excluded from the report with justification for their exclusion	Category 1: Purchased Goods & Services – likely to be minimal, only applicable for a small number of office supplies (Sustainable procurement policies in place for janitorial and stationary supplies) Category 2: Capital Goods – not material Category 3: Fuel and Energy Related Activities (not incl. in Scope 1 or 2) – likely to be minimal, small office on renewable electricity supply Category 4: Upstream Transportation & Distribution – likely to be minimal, only applicable for office maintenance Category 9: Downstream Transportation & Distribution – applicable to downstream suppliers e.g. AATFs, difficulty in data collection Category 10: Processing of sold products – not applicable, Comply Direct are not involved in the sale of products Category 11: Use of sold products – not applicable, Comply Direct are not involved in the sale of products Category 12: End-of-Life treatment of sold products (Disposal) – not applicable, Comply Direct are not involved in the sale of products

	<p>Category 13: Downstream leased assets – not applicable, Comply Direct do not lease any downstream assets</p> <p>Category 14: Franchises – not applicable, Comply Direct do not own or operate franchises</p> <p>Category 15: Investments – not applicable, Comply Direct are not investors or providers of financial services</p>
The year chosen as base year and rationale for choosing the base year	2019 – this was the first year Comply Direct calculated a calendar year carbon footprint, and represented a normal operating year for business activities
Once a base year has been established, the chosen base year emissions recalculation policy. If base year emissions have been recalculated, the context for any significant emissions changes that triggered the recalculation.	We will adjust our base year emissions to account for significant changes (e.g. acquisitions, methodology changes, discovery of errors) which drives a change in emissions of greater than 5%

Part 2: Greenhouse gas emissions data

Scopes and categories	Metric tonnes CO ₂ e
Scope 1: Direct emissions from owned/controlled operations	Not applicable
Scope 2: Indirect emissions from the use of purchased electricity, steam, heating and cooling	3.06 (location-based) 0 (market-based)
Upstream Scope 3 emissions:	
Waste generated in operations	0.43
Business Travel	2.17
Employee commuting	28.85
Upstream leased assets (heating in leased office)	13.73

Part 4: Description of methodologies and data used

Descriptive information	Company response
Scope 1	Not applicable
Scope 2	Total electricity usage is calculated based on meter readings taken at the start and end of the reporting period. We report both location-based and market-based emissions to account for the 100% renewable electricity we purchase.

Scope 3 category	Description of the types and sources of data used to calculate emissions	Description of the methodologies, allocation methods, and assumptions used to calculate emissions	Description of the data quality of reported emissions	Percentage of emissions calculated using data obtained from suppliers or other value chain partners
Category 5: Waste generated in operations	<p>Activity data (primary data): Amount of general and recyclable waste produced during the period recorded by weighing office bins on a weekly basis</p> <p>Financial data (secondary data): Total cost of water bill for the reporting period</p> <p>Emissions factors (secondary data): Emissions factors were obtained from the DEFRA 2021 published conversion factors for company reporting</p>	<p>All general waste is assumed to go to landfill, all recyclable waste is assumed to be recycled. Due to gaps in data for 2021 due to changes in office occupancy, actual weights were used for January-June, and average weights based on the complete November-December records were used for July - October</p> <p>Water consumption is split 50/50 between water supply and water treatment</p>	Fair	0%
Category 6: Business Travel	<p>Financial data (secondary data): Mileage travelled calculated from expense claims:</p> <ul style="list-style-type: none"> -By car calculated based on 45p or 30p per mile rate -By train based on average 55p per mile rate - By tube based on average £1.176 per mile rate - By taxi based on average £2.86 per mile rate -For those with record start and end destinations, distance travelled was used 	<p>Assumed that expense rates per mile equates to mileage travelled</p> <p>Assumed flight distances align with distances calculated on webflyer.com</p> <p>For any journeys which did not include start and end destination details, average values were used</p>	Fair	0%

	Emissions factors (secondary data): Emissions factors were obtained from the DEFRA 2021 published conversion factors for company reporting			
Category 7: Employee commuting	<p>Activity data (primary data): Distance travelled by each employee based on home and office post codes. Car registration numbers used to assign appropriate vehicle size and fuel type conversion factors</p> <p>Emissions factors (secondary data): Emissions factors were obtained from the DEFRA 2021 published conversion factors for company reporting</p>	<p>Any missing vehicle types were assumed to be average petrol cars.</p> <p>Number of working days in the office for each employee was estimated based on part vs full time workers, annual leave and bank holidays, and the homeworking log. The homeworking log applied from July-December, prior to this about 10% of employees were fully working from home, so 10% of emissions was subtracted from the calculations for the first 6 months of the year.</p> <p>Distance from home to office was multiplied by 2 for the daily distance, then multiplied by days in work.</p>	Good	0%
Category 8: Upstream leased assets	<p>Activity data (primary data): Litres of heating oil purchased for the leased office from invoices during the reporting period</p> <p>Emissions factors (secondary data): Emissions factors were obtained from the DEFRA</p>	Assumed all heating oil purchased in the period was used in the reporting period	Good	0%

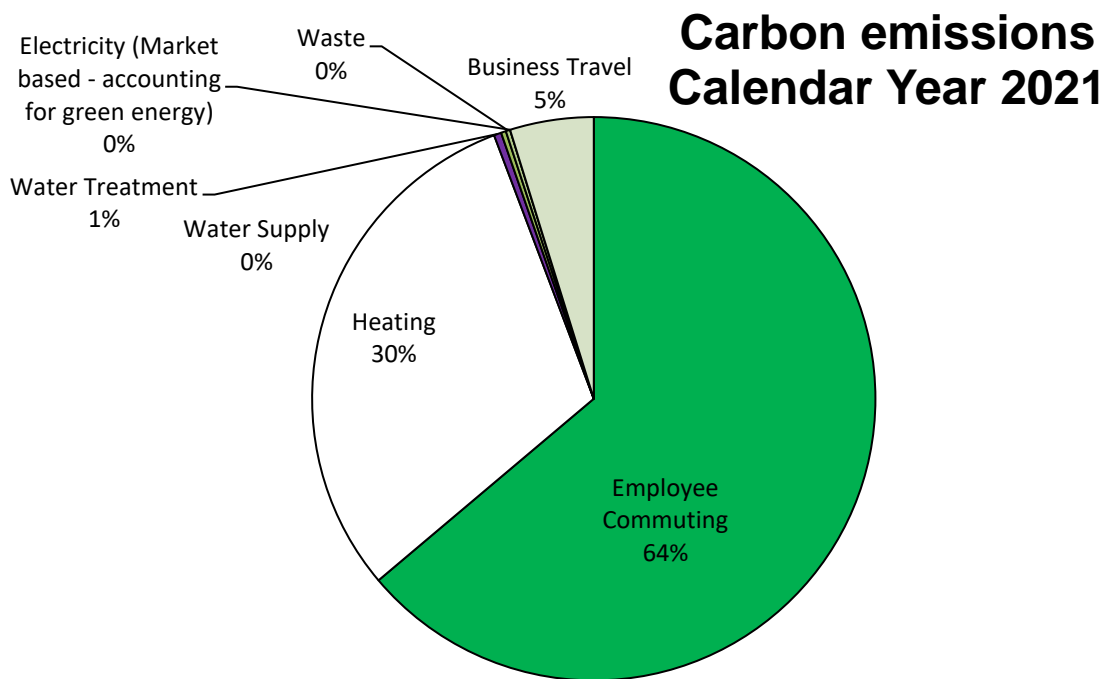
	2021 published conversion factors for company reporting			
--	---	--	--	--

Part 5: Greenhouse gas emissions in the base year

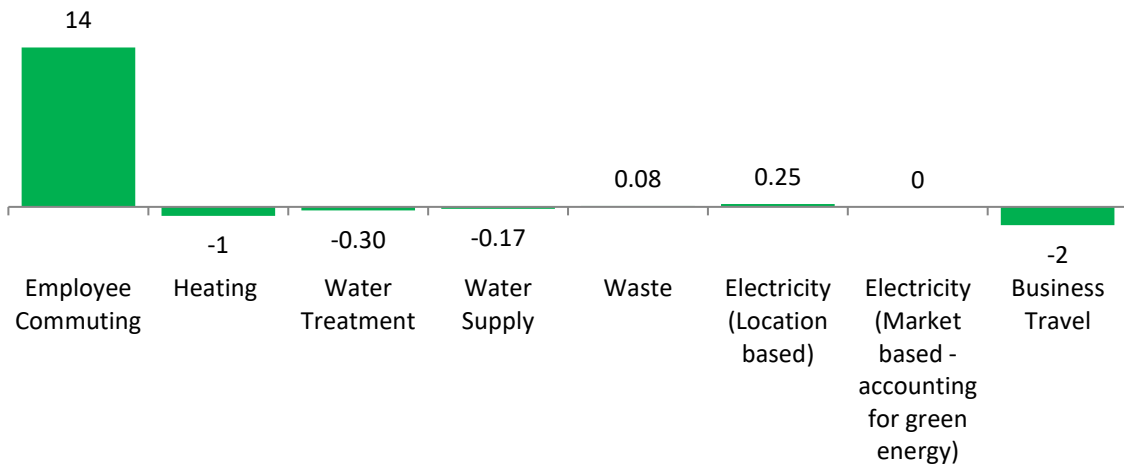
Scopes and categories	Metric tonnes CO ₂ e
Scope 1: Direct emissions from owned/controlled operations	Not applicable
Scope 2: Indirect emissions from the use of purchased electricity, steam, heating and cooling	3.24 (location-based) 1.91 (market-based)
Upstream Scope 3 emissions:	
Waste generated in operations	0.87
Business Travel	17.45
Employee commuting	32.23
Upstream leased assets	11.95

Part 6: Optional Information

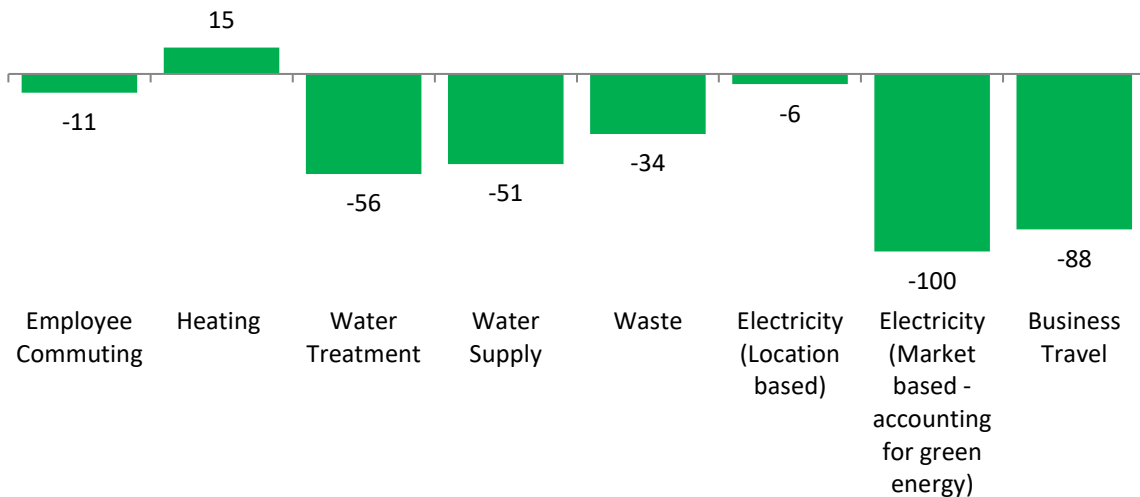
Scope	Emissions (tCO2e) by activity	2021	2020
3	Employee Commuting	28.85	15.35
3	Heating	13.73	14.50
3	Water Treatment	0.19	0.49
3	Water Supply	0.13	0.30
3	Waste	0.11	0.04
2	Electricity (Location based)	3.06	2.81
2	Electricity (Market based - accounting for green energy)	0.00	0.00
3	Business Travel	2.17	3.72
Total Gross Carbon Emissions (tCO2e)		48.24	37.20
Total Gross Emissions [Scope 2 [market based] (tCO2e)]		45.18	34.39
Total Carbon Emissions per FTE (tCO2e)		1.79	1.49
Total Carbon Emission by turnover (tCO2e per £m)		1.61	0.76
Employee Commuting Emissions by FTE (tCO2e per full time employee)		1.07	



Differences in emissions 2020 vs 2021 (tCO₂e)



% Change in emissions 2019 to 2021



Business travel decreased by 2 tonnes (42%) against 2020, we had a company target on business travel against 2019 given this was the last year with normal business activities, but had anticipated this may increase against 2020 (which saw a 75% reduction due to the COVID-19 pandemic). As demonstrated above business travel has reduce by 88% compared to 2019, far exceeding our target. This demonstrates the initiatives introduced and focus on business travel is working well for ongoing reductions, while maintaining customer satisfaction.

Employee commuting has increased by 14 tonnes (88%) compared to 2020, likely due to the transition to working 3 days a week in the office, whereas much of 2020 employees were working from home more regularly. This may also be slightly impacted by an improvement in the accuracy of these calculations as well as an increase in employee numbers. We are going to look to report employee commuting emissions per full time employee and have introduced a carshare initiative to focus on improvements in this area.

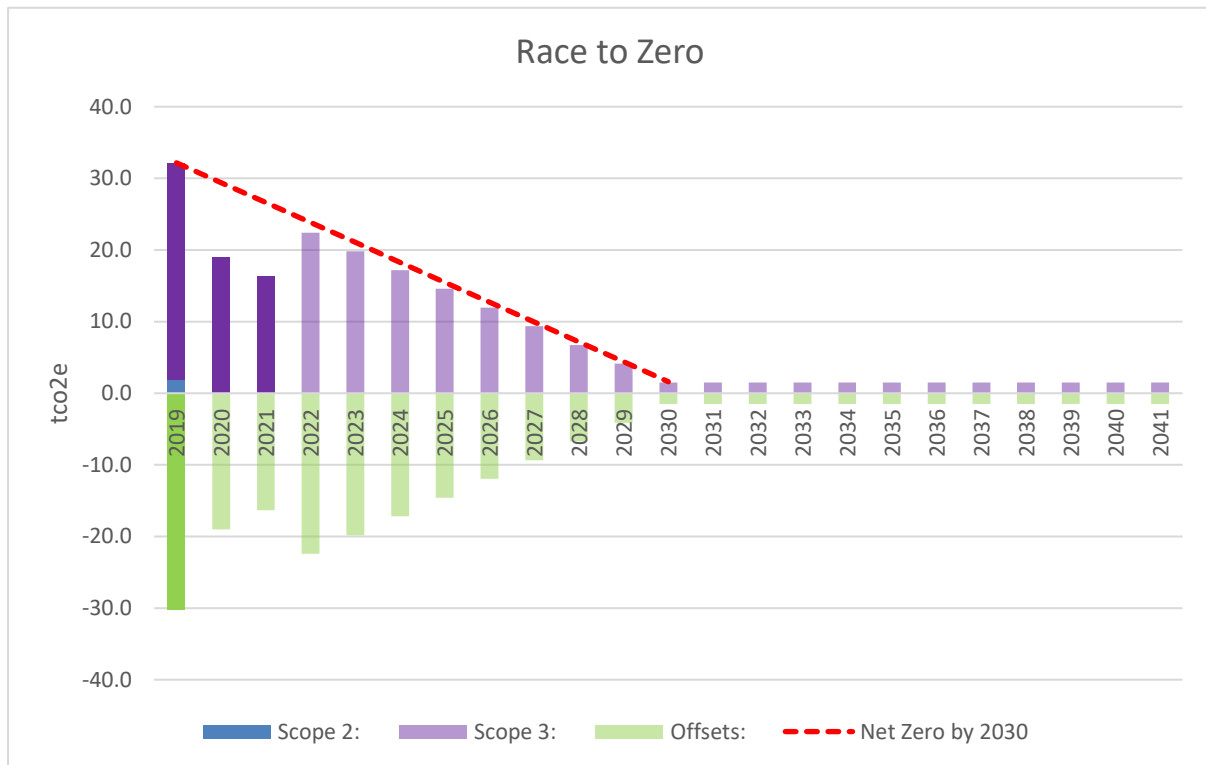
Heating has seen a minor decrease compared to last year, potentially related to the landlord having fitted timers to the heating system to ensure it is not operating overnight which has reduced the

requirement for staff to remember to switch off individual radiators, we expect this to reduce our heating use further next year.

Carbon reduction plan

We have recently increased our ambition to reach net zero by 2030 for our direct emissions. This involves an 8.64% reduction per year, and an overall 95% reduction in emissions against the 2019 baseline by 2030. This pathway meeting the Race to Zero initiative requirements we have already committed to, and aligning with the Business Declares ambition.

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



We continue to purchase verified carbon offsets to take responsibility for our emissions now and achieve carbon neutrality status. We have purchased 46 tonnes of verified carbon offsets to offset our 2021 emissions from a range of projects including reducing deforestation in the Amazon, supporting wind farm projects in India, and clean cook stoves projects in Kenya. We have planted 9 UK trees in addition to this.

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