

PUBLIC DISCLOSURE STATEMENT

PLENARY GROUP HOLDINGS PTY LTD

ORGANISATION CERTIFICATION CY2022

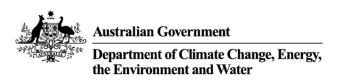
Climate Active Public Disclosure Statement







NAME OF CERTIFIED ENTITY	Plenary Group Holdings Pty Ltd
REPORTING PERIOD	1 January 2022 – 31 December 2022 Arrears report
DECLARATION	To the best of my knowledge, the information provided in this public disclosure statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.
	David Lamming Chief Executive Officer 31 May 2023



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Version March 2023.



1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	1,617.41 tCO ₂ -e
OFFSETS USED	48% ACCUs, 52% VCUs
RENEWABLE ELECTRICITY	17.96%
CARBON ACCOUNT	Prepared by: Plenary Group Holdings Pty Ltd
TECHNICAL ASSESSMENT	7 October 2021 Amélie Uhrig Point Advisory Pty Ltd Next technical assessment due: CY2024

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2. CARBON NEUTRAL INFORMATION

Description of certification

This certification is for Plenary Group Holdings Pty Ltd (Plenary) and comprises Plenary's relevant Australian and international business operations. CY2022 is Plenary's third year of certification. Plenary's first year of certification was CY2020 with CY2019 being the base year to measure Plenary's emissions pre the impact of COVID-19. Any reference in this statement to 'Plenary' or 'Plenary Group' is a reference to the certified entity. Emissions associated with Plenary's investment portfolio have been excluded from the emissions boundary.

Organisation description

Plenary Group Holdings Pty Ltd (Plenary Group Holdings), ABN 20 607 311 946, is the parent company of the Plenary group, Asia Pacific's leading independent long-term investor, developer and manager of public infrastructure, specialising in public-private partnerships and precinct development. Plenary Group Holdings Pty Ltd trades as "Plenary" and "Plenary Group".

The following subsidiaries are also included within this certification:

Legal entity name	ABN	ACN
Plenary Origination Pty Ltd	83 161 527 519	161 527 519
Plenary Asset Management Pty Ltd	70 161 527 466	161 527 466
Plenary Services Pty Ltd	41 612 289 933	612 289 933
Plenary Investment Holdings Pty Ltd	52 607 316 950	607 316 950
Plenary Asia Holdings Pty Ltd	35 651 054 438	651 054 438
Plenary Asia Pte. Ltd.	Incorporated under the laws of Singapore	N/A
Plenary Middle East Ltd.	Incorporated under the laws of the Abu Dhabi Global Market	N/A
Plenary Europe Holdings Pty Ltd.	73 657 767 112	657 767 112
Plenary Europe Ltd	Incorporated in the UK	N/A
Plenary Funds Management Pty Ltd (PFM)	33 647 661 372	647 661 372
Pariter Pty Ltd	65 641 266 533	641 266 533

Established in 2004, Plenary now employs more than 200 professionals across offices in Sydney, Melbourne, Brisbane, Adelaide, London, Dubai and Singapore whose activities are included in this certification. Our assets under management comprise 21 projects worth more than \$31 billion. Plenary's business activities include origination, delivery and asset management.



3.EMISSIONS BOUNDARY

Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

Quantified emissions have been assessed as relevant and are quantified in the carbon inventory. This may include emissions that are not identified as arising due to the operations of the certified entity, however, are **optionally included**.

Non-quantified emissions have been assessed as relevant and are captured within the emissions boundary but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

Outside the emissions boundary

Excluded emissions are those that have been assessed as not relevant to an organisation's operations and are outside of its emissions boundary or are outside of the scope of the certification. These emissions are not part of the carbon neutral claim. Further detail is available at Appendix D.

Outside emission Inside emissions boundary boundary **Excluded** Quantified Non-quantified Investment portfolio Accommodation and facilities N/A Bid offices Climate Active Carbon Neutral products and services Electricity (including base building electricity) ICT services and equipment Office equipment & supplies **Professional Services** Stationary Energy (Base building natural gas) Transport (Air) Transport (Land and Sea) Waste Water Working from home



4.EMISSIONS REDUCTIONS

Emissions reduction strategy

In its third year of certification, Plenary has continued to prosecute our environmental, social and corporate governance (ESG) agenda.

Plenary reaffirms the commitment made during the CY2021 certification, to reduce its scope 2 electricity emissions per FTE by 30% from its 2019 base year by 2027. Plenary took steps during CY2022 towards the achievement of this commitment, which are explained in the 'Emissions reduction actions' section below. Additionally, we will continue to explore ways to reduce our carbon emissions across other scopes where possible. However, there are two factors which presently challenge our ability to reduce our emissions overall, in particular:

- Workforce growth: Plenary's workforce has increased by approximately 16% during the reporting period. It is currently anticipated that the workforce will continue to grow to enable Plenary to pursue and service new business opportunities; and
 - International expansion: As anticipated, during CY2022 there was an increased requirement for international travel as Covid restrictions eased and Plenary pursued international business opportunities. Plenary is likely to face an increased requirement to travel internationally to pursue new business opportunities in international growth markets for the foreseeable future. Additionally, Plenary has established two additional international offices during the reporting period.

Notwithstanding these challenges, we will continue to seek to identify and to pursue opportunities to reduce emissions. Progress against our Emissions Reduction Strategy as set out in our CY2021 Public Disclosure Statement is outlined in the section 'Emissions reduction actions'.

Additionally, Plenary will continue to investigate:

- The purchase of other Climate Active certified carbon neutral products and services (in addition to
 office paper and tenancy light and power electricity supply, which we already procure in this way)
 for ongoing use;
- Opportunities to improve energy efficiency and to improve waste diversion and reduction within our office tenancies:
- Improving the energy efficiency of our IT equipment and end-of life disposal strategies.

Plenary has also recently joined the United Nations Global Compact, the world's largest corporate sustainability initiative, and has taken up the opportunity to participate in its Climate Ambition Accelerator Program during the second half of CY2023 for the purpose of accelerating Plenary's progress towards setting science-based emissions reduction targets.

Further information on Plenary's approach to sustainability and ESG can be found here: https://plenarygroup.com/about/sustainability-and-esg



Emissions reduction actions

Progress against our Emissions Reduction Strategy set in CY2021 is outlined in the table below.

Emissions reduction action/initiative	Timeframe	Progress
Explore procuring Plenary's tenancy electricity consumption at our two main corporate offices, Sydney and Melbourne, through sustainable sources. We will explore the procurement of GreenPower and/or Climate Active certified electricity products.	By end of CY2023	Achieved. In December 2022, we successfully completed the procurement of 100% GreenPower for our tenancy electricity consumption at our two main corporate offices. Additionally, our Sydney office base building energy was changed part way through the year to supply electricity with a RPP of 1%. Facilities Management of our Melbourne office building have indicated that they have achieved accreditation as Carbon Neutral for the base build.
Explore updating Plenary's travel policy, released in 2021, to include a process to consider alternative options prior to booking domestic and international travel, including the use of video conferencing facilities (such as Zoom and MS Teams).	By end of CY2023	Achieved. Plenary's travel policy was updated in CY2021 to advocate for the consideration of alternative options prior to booking domestic and international travel, including the use of video conferencing facilities. During CY2023 we will investigate strategies to promote greater awareness among team members of the emissions impact of planned travel prior to booking.
Explore processes to reduce paper usage.	By end of CY2023	In Progress. In CY2021, Plenary updated all employee email signatures to include a message encouraging recipients to consider the environment before printing, which is automatically applied to all emails sent. Additionally, since CY2021, Plenary has continued to introduce new IT systems internally to reduce printing and delivery of hard copy materials. During CY2022 this included systems relating to our People & Culture and Risk Management functions. The bid processes in which Plenary participates have increasingly moved away from paper-based to electronic processes, which has also resulted in a reduction in paper usage and printing in our group offices.

Explore the purchase of other Climate

Active certified carbon neutral products

and services for ongoing use.

By end of CY2023

In Progress.

In CY2022, Plenary procured a Climate Active certified electricity product for the light and power supply of our two largest corporate offices. We will continue to review our procurement scope this year to identify any opportunities to procure other Climate Active certified products and services.



5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year							
Total tCO ₂ -e (without uplift) Total tCO ₂ -e (with uplift)							
Base year:	2019	1,397.07	1,417.46				
Year 1:	2020	777.09	788.43				
Year 2:	2021	759.74	773.06				
Year 3:	2022	1,562.65	1,617.41				

Significant changes in emissions

Emission source name	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Detailed reason for change
Electricity (market-based method, scope 2)	183.001	158.871	All electricity data was reported against Identifier 2002 as combined Scope 2/3 emissions last year so this cannot be compared appropriately. However, if the combined total this year had been reported, it would still have resulted in a 2% reduction in emissions.
Long business class flights (>3,700km)	26.083	646.294	Due to the impact of Covid in CY2020 and CY2021, international business travel was rarely used. With all restrictions lifted throughout CY2022, normal travel activities resumed. Plenary's international travel requirements also increased, to pursue new business opportunities and open two international offices.

The increase in Plenary's emissions since CY2021 was primarily driven by the return to pre-Covid travel activity for the business, particularly international business flights, which returned to a similar level to that undertaken in Plenary's base year of CY2019. As Plenary has expanded its business in Asia, the Middle East and Europe, it has been necessary for senior executives of the business, whose headquarters are in Australia, to travel to these locations to establish branch offices, build relationships with potential business partners and prepare for Plenary to bid on new opportunities in these markets. Plenary is working towards containing and ultimately reducing emissions in this category by building local teams, and through the increased use of electronic meetings, however, given the range of new opportunities and markets being explored, at this stage it is still necessary for senior executives to attend some overseas meetings in person.



Use of Climate Active carbon neutral products, services, buildings or precincts

Certified brand name	Product/Service/Building/Precinct used
Reflex Ultra White	Reflex Ultra White A4/A3 80gsm Paper
Powershop	Business Saver Electricity (100% GreenPower)

Emissions summary

The electricity summary is available in the Appendix B. Electricity emissions were calculated using a market-based approach.

Emission category	Sum of Scope 1 (t CO2-e)	Sum of Scope 2 (t CO2-e)	Sum of Scope 3 (t CO2-e)	Sum of Total Emissions (t CO2-e)
Accommodation and facilities	0.00	0.00	42.12	42.12
Climate Active Carbon Neutral Products and Services	0.00	0.00	0.00	0.00
Electricity	0.00	158.87	21.03	179.90
ICT services and equipment	0.00	0.00	101.47	101.47
Office equipment & supplies	0.00	0.00	33.86	33.86
Professional Services	0.00	0.00	138.77	138.77
Stationary Energy (gaseous fuels)	25.55	0.00	4.04	29.59
Transport (Air)	0.00	0.00	798.05	798.05
Transport (Land and Sea)	0.00	0.00	197.98	197.98
Waste	0.00	0.00	5.25	5.25
Water	0.00	0.00	1.90	1.90
Working from home	0.00	0.00	33.77	33.77
Total	25.55	158.87	1378.23	1562.65

Uplift factors

An uplift factor is an upwards adjustment to the total carbon inventory to account for relevant emissions that cannot be reasonably quantified or estimated. This conservative accounting approach helps ensure the integrity of the carbon neutral claim.

Reason for uplift factor	tCO₂-e
To account for activities associated with Plenary Asia (Singapore)	25.5
To account for activities associated with Plenary Middle East	16.81
To account for activities associated with Plenary Europe (London)	12.45
Total of all uplift factors	54.77
Total emissions footprint to offset (total emissions from summary table + total of all uplift factors)	1,617.41

The Climate Active calculators do not allow for input from offices outside of Australia hence the uplift was used for Plenary's international offices instead. Plenary has calculated uplift in respect of its three international



offices based on the number of employees employed in each office, using the emissions per person in Plenary's Australian operations, excluding categories where actual data was available in respect of the international staff, such as travel-related data including flights and accommodation.

Minimal information regarding electricity consumption was available due to the offices being located in serviced facilities rather than leased or owned premises. Therefore, the electricity portion of the uplift calculation is based on the tenancy floor space electricity consumption per person from the Australian offices. Given Australian greenhouse emission factors are some of the highest in the world, we believe this will be the most conservative approach. The calculation takes into account that Plenary's international team members work from home one day per week.



6.CARBON OFFSETS

Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 1,617.41 t CO₂-e. The total number of eligible offsets used in this report is 1,618. Of the total eligible offsets used, 219 were previously banked and 1,399 were newly purchased and retired. 651 are remaining and have been banked for future use.

Co-benefits

Mapoon Carbon Project

The Mapoon Carbon Project involves the strategic and planned burning of savanna areas in Queensland to reduce the risk of large and intense late dry season wildfires as well as their extent and frequency. The Project employs the knowledge of local indigenous communities who have cared for country for millennia, creating job opportunities and additional revenue streams for traditional owners. The project's non-carbon benefits (co-benefits) can be mapped to the following Sustainable Development Goals (SDGs): 13 Climate Action, 15 Life on Land and 17 Partnerships for the Goals (i.e. partnerships between non-indigenous Australians and Traditional Owners for savanna fire management).

Jawoyn Fire 2 Project

The Jawoyn Fire 2 Project involves the strategic and planned burning of savanna areas in the high rainfall zone in the Northern Territory during the early dry season to reduce the risk of late dry season wildfires. The Project is carried out by the Jawoyn Association Aboriginal Corporation on traditional Jawoyn land. The Project provides revenue and supports jobs and training for landowners and custodians. The Project's cobenefits can be mapped to the following Sustainable Development Goals: 13 Climate Action, 15 Life on Land and 17 Partnerships for the Goals (i.e. partnerships between non-indigenous Australians and Traditional Owners for savanna fire management).

My Son – Hoan Loc Viet Solar Energy Project, Vietnam

The My Son – Hoan Loc Viet Solar Energy Project is a solar power project in Ninh Son district, Ninh Thuan province, Vietnam. The purpose of this Project is to generate a clean form of electricity through a renewable solar energy source to displace fossil fuels. The net electricity generated from this Project is estimated to be 77,567 MWh annually. The Project promotes sustainable development through the following aspects: It provides clean energy and reduces the country's dependence on fossil fuels for electricity generation. The amount of electricity produced from the Project is supplied directly to the national grid, which helps to reduce grid losses and increases energy security when the grid is overloaded. Additionally, the Project has created employment opportunities for the local community during the construction phase and continues to do so during its operation. The Project's co-benefits can be mapped to the following SDGs: 7 Affordable and Clean Energy, 8 Decent Work and Economic Growth, 9 Industry, Innovation and Infrastructure and 13 Climate Action.



Eligible offsets retirement summary

Offsets retired for Climate Active Carbon Neutral Certification											
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Stapled quantity	Eligible quantity retired (tCO ₂ -e)	Eligible quantity used for previous reporting periods	Eligible quantity banked for future reporting periods	Eligible quantity used for this reporting period	Percentage of total (%)
Mapoon Carbon Project EOP100766 (Queensland, Australia)	ACCUs	ANREU	13 May 2022	8,329,089,028 – 8,329,089,448 (see Appendix A)	2020- 2021	0	0	202	0	219	14%
Jawoyn Fire 2 Project ERF102021 (Northern Territory, Australia)	ACCUs	ANREU	26 May 2023	8,330,478,600 – 8,330,479,149 (see Appendix A)	2021- 2022	0	550	0	0	550	34%
My Son - Hoan Loc Viet Solar Energy Project Project 1958 (Ninh Thuan province, Vietnam)	VCUs	VERRA	31 May 2023	15217-668038123- 668039622-VCS-VCU-264- VER-VN-1-1958-01012021- 31122021-0	2021	0	1,500	0	651	849	52%
Total eligible offsets retired and used for this report							1,618				
Total eligible offsets retired this report and banked for use in future reports 651											

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Australian Carbon Credit Units (ACCUs)	769	48%
Verified Carbon Units (VCUs)	849	52%



7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

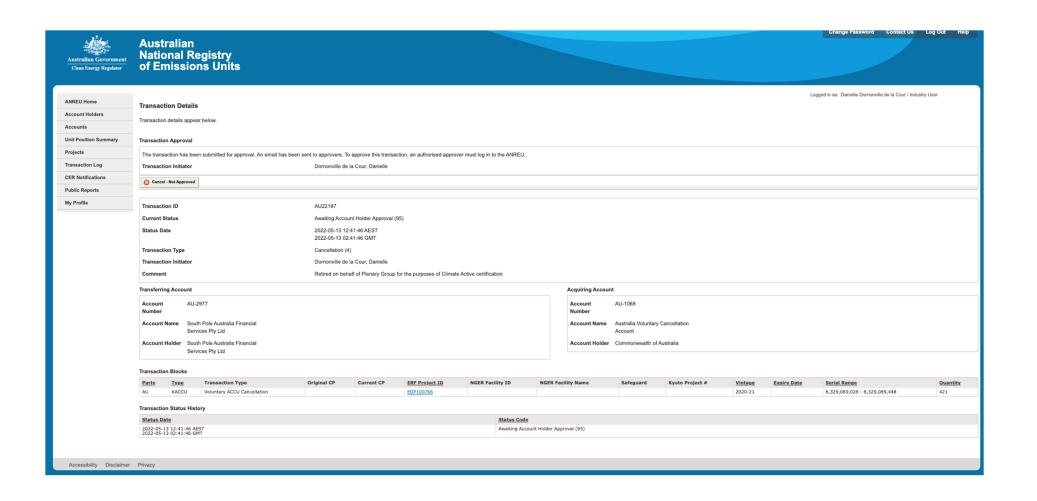
N/A



APPENDIX A: ADDITIONAL INFORMATION

Evidence of retirement of Mapoon Carbon Project and Jawoyn Fire 2 Project ACCUs as described in Section 6 (Eligible offsets retirement summary)

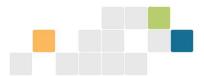






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26 May 2023

VC202223-00167

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Commonwealth Bank of Australia (account number AU-1021.

The details of the cancellation are as follows:

Date of transaction	26 May 2023 AEST
Transaction ID	AU27521
Type of units	KACCU
Total Number of units	550
Serial number range	8,330,478,600 - 8,330,479,149
ERF Project	Jawoyn Fire 2 – ERF102021
Vintage	2021-22
Transaction comment	Retired on behalf of Plenary Group Holdings Pty Ltd to meet its obligations under the Climate Active Carbon Neutral Standard for the calendar year 2022

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information.

If you require additional information about the above transaction, please email $\underline{\sf CER-RegistryContact@cer.gov.au}$

Yours sincerely,

David O'Toole

ANREU and International NGER and Safeguard Branch

Scheme Operations Division

Clean Energy Regulator

registry-contact@cer.gov.au www.cleanenergyregulator.gov.au



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APPENDIX B: ELECTRICITY SUMMARY

There are two international best-practice methods for calculating electricity emissions – the location-based method and the market-based method. Reporting electricity emissions under both methods is called dual reporting.

Dual reporting of electricity emissions is useful, as it provides different perspectives of the emissions associated with a business's electricity usage.

Location-based method:

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

Market-based method:

The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

For this certification, electricity emissions have been set by using the market-based approach.



Market-based approach	Activity Data (kWh)	Emissions (kg CO ₂ -e)	Renewable percentage of total
	0	0	0%
Behind the meter consumption of electricity generated			
Total non-grid electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs)	0	0	0%
GreenPower	0	0	0%
Climate Active precinct/building (voluntary renewables)	0	0	0%
Precinct/Building (LRET)	0	0	0%
Precinct/Building jurisdictional renewables (LGCS surrendered)	0	0	0%
Electricity products (voluntary renewables)	0	0	0%
Electricity products (LRET)	0	0	0%
Electricity products jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	0	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	43,158	0	18%
Residual Electricity	197,194	188,321	0%
Total renewable electricity (grid + non grid)	43,158	0	18%
Total grid electricity	240,352	188,321	18%
Total electricity (grid + non grid)	240,352	188,321	18%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	197,194	188,321	
Scope 2	174,146	166,309	
Scope 3 (includes T&D emissions from consumption under operational control)	23,049	22,012	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	17.96%
Mandatory	17.96%
Voluntary	0.00%
Behind the meter	0.00%
Residual scope 2 emissions (t CO ₂ -e)	166.31
Residual scope 3 emissions (t CO ₂ -e)	22.01
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	158.87
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	21.03
Total emissions liability (t CO ₂ -e)	179.90
Figures may not sum due to rounding. Renewable percentage can be above 100%	



Location-based approach	Activity Data (kWh) total	Under operational control			Not under operational control		
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kgCO ₂ -e)	Scope 3 Emissions (kgCO ₂ -e)	(kWh)	Scope 3 Emissions (kgCO ₂ -e)	
ACT	0	0	0	0	0	0	
NSW	128,452	128,452	93,770	7,707	0	0	
SA	4,487	4,487	1,122	359	0	0	
VIC	83,487	83,487	70,964	5,844	0	0	
QLD	23,926	23,926	17,466	3,589	0	0	
NT	0	0	0	0	0	0	
WA	0	0	0	0	0	0	
TAS	0	0	0	0	0	0	
Grid electricity (scope 2 and 3)	240,352	240,352	183,322	17,499	0	0	
ACT	0	0	0	0			
NSW	0	0	0	0			
SA	0	0	0	0			
VIC	0	0	0	0			
QLD	0	0	0	0			
NT	0	0	0	0			
WA	0	0	0	0			
TAS	0	0	0	0			
Non-grid electricity (behind the meter)	0	0	0	0			
Total electricity (grid + non grid)	240,352						

Residual scope 2 emissions (t CO ₂ -e)	183.32
Residual scope 3 emissions (t CO²-e)	17.50
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	176.40
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	16.93
Total emissions liability	193.32

Operations in Climate Active buildings and precincts

operations in climate receive ballatings and precincte		
Operations in Climate Active buildings and precincts	Electricity consumed in Climate Active certified building/precinct (kWh)	Emissions (kg CO ₂ -e)
N/A	0	0

Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their building or precinct certification. This electricity consumption is also included in the market based and location based summary tables. Any electricity that has been sourced as renewable electricity by the building/precinct under the market based method is outlined as such in the market based summary table.



Climate Active carbon neutral electricity products

Climate Active carbon neutral product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO ₂ -e)
PowerShop 100% GreenPower	4,746	0
PowerShop 100% GreenPower	4,073	0

Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their electricity product certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the electricity product under the market-based method is outlined as such in the market-based summary table.



APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as relevant, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. They have been non-quantified due to <u>one</u> of the following reasons:

- 1. Immaterial <1% for individual items and no more than 5% collectively
- 2. Cost effective Quantification is not cost effective relative to the size of the emission but uplift applied.
- 3. <u>Data unavailable</u> Data is unavailable, but uplift applied. A data management plan must be put in place to provide data within 5 years.
- 4. Maintenance Initial emissions non-quantified but repairs and replacements quantified.

Relevant non-quantified emission sources	Justification reason
N/A	N/A

Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary that require a data management plan.



APPENDIX D: OUTSIDE EMISSIONS BOUNDARY

Excluded emission sources

The below emission sources have been assessed as not relevant to this organisation's operations and are outside of its emissions boundary. These emissions are not part of the carbon neutral claim. Emission sources considered for relevance must be included within the certification boundary if they meet two of the five relevance criteria. Those which only meet one condition of the relevance test can be excluded from the certification boundary.

Emissions tested for relevance are detailed below against each of the following criteria:

- <u>Size</u> The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy, and fuel emissions.
- 2. <u>Influence</u> The responsible entity has the potential to influence the reduction of emissions from a particular source.
- 3. <u>Risk</u> The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.
- 4. Stakeholders Key stakeholders deem the emissions from a particular source are relevant.
- Outsourcing The emissions are from outsourced activities previously undertaken within the
 organisation's boundary, or from outsourced activities typically undertaken within the boundary for
 comparable organisations.



Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Investment portfolio	Y	N	N	N	N	Size: Plenary's investments are typically partial ownership stakes in project companies which subcontract to and manage multiple parties to complete the design, construction, operations, and maintenance of infrastructure projects under a concession from government clients. Whilst the emissions generated by the projects (which include education, health and transport projects) are significant, they are not generated by Plenary at the organisation level nor are they within Plenary's operational control or influence, for the reasons noted below. Influence: We do not have the potential to materially influence the emissions from this source. The investments are in project companies which are subject to the constraints of co-ownership with other investors and are bound by long-term contracts with the end-client upstream and subcontractors downstream. Operational emissions are within the control of the Government operators of the facilities. Risk: There are no relevant laws or regulations that apply to limit emissions arising from Plenary's investment in project companies. Stakeholders: Plenary's organisational stakeholders are unlikely to consider this a relevant source of emissions for our business at the organisation level, which is the basis of this certification. Outsourcing: The emissions are not from activities previously undertaken within Plenary's organisation boundary, or from activities typically undertaken within the boundary for comparable organisations.
Bid offices	N	N	N	N	N	Size: The emissions source is likely to be low compared to the total emissions from electricity, stationary energy, and fuel emissions. Influence: We do not have the potential to materially influence the emissions from this source. These offices are established on a temporary basis under a short-term arrangement and are often collocated with other consortium members. Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest. Stakeholders: Key stakeholders are unlikely to consider this a relevant source of emissions for our business at the organisation level, which is the basis of this certification. Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.





