

Climate Active Public Disclosure Statement



An Australian Government Initiative



Cromwell Operations Pty Ltd

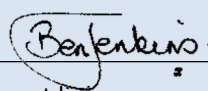
July 2018 to June 2019

Declaration

To the best of my knowledge, the information provided in this Public Disclosure Summary is true and correct and meets the requirements of the National Carbon Offset Standard Carbon Neutral Program.

Executed by Cromwell Operations Pty Ltd ACN 107 377 677 in accordance with section 127 of the Corporations Act 2001 (Cth):

Signature 	Signature 
Name of Signatory Harinder Singh Binning	Name of Signatory Lucy Ellen Laakso
Position of Signatory DIRECTOR	Position of Signatory COMPANY SECRETARY

Carbon neutral certification category	Organisation
Date of most recent external verification/audit	21 January 2020
Auditor 	Benjamin Jenkins - GPP Audit Pty Limited
Auditor assurance statement link	



Australian Government
Department of Industry, Science,
Energy and Resources

Public Disclosure Summary documents are prepared by the submitting organisation. The material in Public Disclosure Summary documents represents the views of the organisation and do not necessarily reflect the views of the Commonwealth. The Commonwealth does not guarantee the accuracy of the contents of the Public Disclosure Summary documents and disclaims liability for any loss arising from the use of the document for any purpose.

1. Carbon neutral information

1A. Introduction

Cromwell is an internally managed Australian Real Estate Investment Trust (A-REIT), listed on the Australian Securities Exchange, with securityholders in 22 countries. Cromwell is a trusted capital partner and fund manager to a range of global and local investors, capital providers and banking partners and has a strong track record of creating value and delivering superior risk weighted returns throughout the real estate investment cycle.

Cromwell's global platform comprises 420+ staff across 30 offices in 15 countries across Australia, New Zealand and Europe. The Group has total Assets Under Management (AUM) of AUD \$11.9 / €7.5 billion as at 30 June 2019.

Cromwell is committed to acting responsibly and proactively to continuously improve our sustainability performance and to support a responsible and balanced pathway to sustained business success.

Our aim is to provide continued financial security for our investors, improve the communities in which we operate and be at the forefront of sustainable business practice globally.

Progress against our Sustainability Framework and our pathway to carbon neutral operations is detailed in our latest Sustainability Report, available via <https://www.cromwellpropertygroup.com/sustainability>.

A control approach has been used to determine the appropriate boundary for the GHG assessment. Australian offices which contain 5 or more full time employees have been included as a facility and associated corporate emissions are recorded in accordance with the diagram shown in 1C.

1B. Emission sources within certification boundary

The methods used for collating data, performing calculations and presenting the carbon account are in accordance with the following standards:

- Climate Active Carbon Neutral Standard for Organisations
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- National Greenhouse and Energy Reporting (Measurement) Determination 2008

Where possible, the calculation methodologies and emission factors used in this inventory are derived from the National Greenhouse Accounts (NGA) Factors in accordance with "Method 1" from the National Greenhouse and Energy Reporting (Measurement) Determination 2008.

The greenhouse gases considered within the inventory are those that are commonly reported under the Kyoto Protocol; carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O). These have been expressed as carbon dioxide equivalents (CO₂-e) using relative global warming potentials (GWPs). No synthetic gases - hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) or Nitrogen Trifluoride (NF₃) were detected within the operational boundary.

Cromwell's certification under Climate Active is for a defined inventory of carbon emissions resulting from the activities of our Australian-based business. Cromwell Operations Pty Ltd uses an operational control approach to determine reporting boundaries, consistent with the *National Greenhouse and Energy Reporting Act (2007)* (Cth) (NGER Act). Scope 1 and Scope 2 emissions are calculated and reported in line with the NGER

Act methodology. Scope 3 emissions are categorised and reported consistent with the principles outlined in the Greenhouse Gas Protocol.

Our carbon neutral boundary includes the direct operational footprint of all Cromwell's corporate offices.

Quantified sources

The following emission sources have been included in the carbon accounts:

- Electricity
- Electricity (Base Building)
- Telecommunications
- Water
- IT Equipment
- Office Paper
- Stationery
- Office furniture
- Employee Commute
- Business Flights
- Cleaning Services
- Food & Catering
- Postage
- Printing
- Hotel Accommodation
- Advertising
- Taxis
- Waste

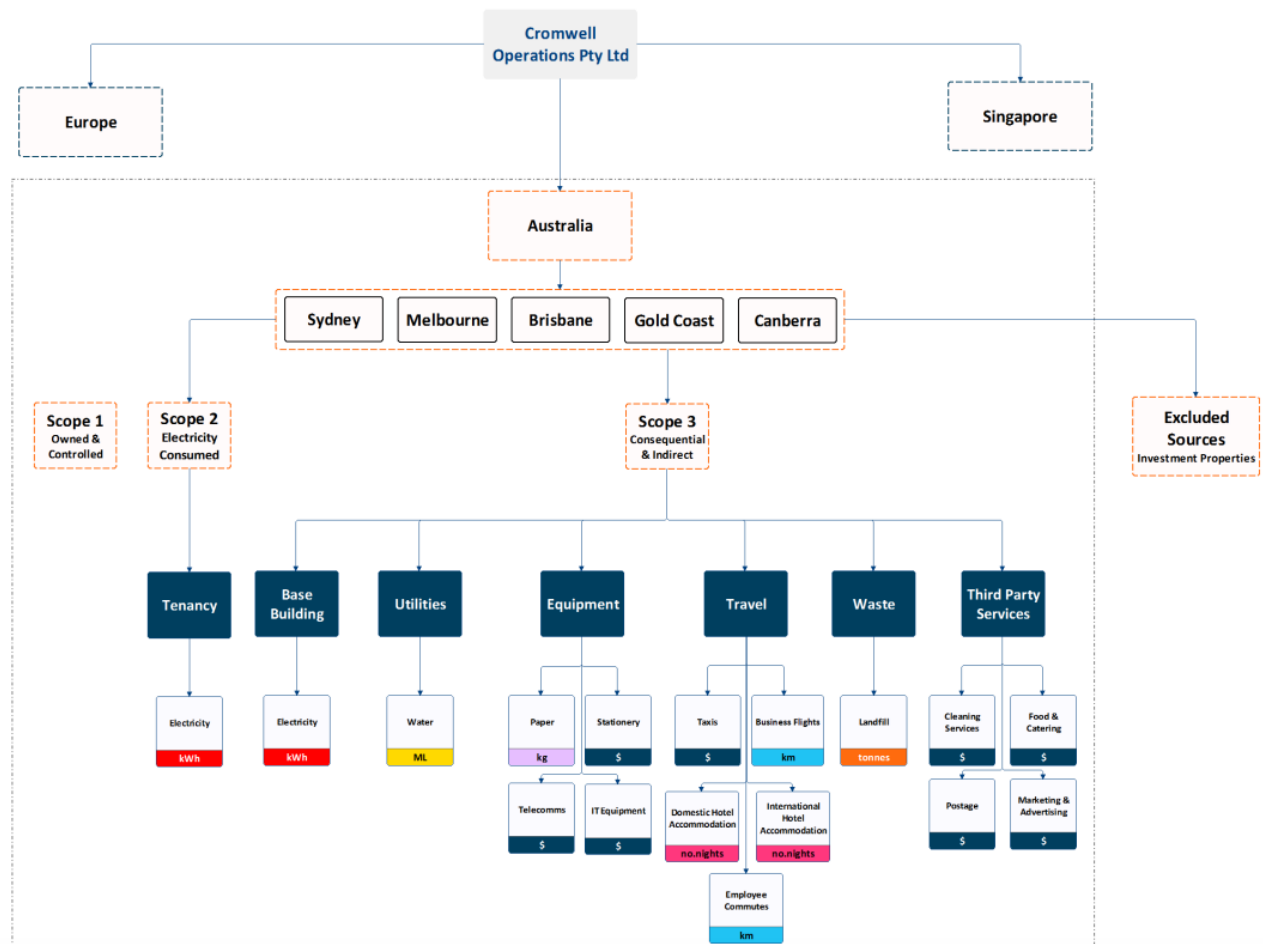
Non-quantified sources

Base building refrigerants and water have not been quantified as they do not meet the criteria for materiality (<1% each and no more than 5% collectively).

Excluded Sources

Investment properties do not meet the relevance test for the certified entity and are therefore excluded. Cromwell's boundary is the emissions created in operating the company activities of which includes the acquisition, development and management of real estate assets contained in varying investment vehicles. As a manager of these vehicles the control over the emissions from property assets will vary based on the lease and management arrangement and the tenants use and operation within each asset for which Cromwell Operations Pty Ltd does not have control.

1C. Diagram of the certification boundary



2. Emissions reduction measures

2A. Emissions reduction strategy

Cromwell's emissions reduction strategy is to target the areas of greatest influence, with preference to the largest contribution to emissions.

Sustainability related initiatives and objectives are integrated throughout the business in accordance with the group sustainability framework and reported in the annual sustainability report.

The group Climate Change Position Policy and related documentation is available on cromwellpropertygroup.com/sustainability

2B. Emissions reduction actions

Over the course of the reporting period, Cromwell emissions reductions were achieved via the following actions:

- Exclusively purchasing carbon neutral office paper, reducing the year on year emissions produced by this item by 13%.
- Investigations were undertaken to determine the cause of increased electricity consumption in the Brisbane office and rectification measures implemented accordingly.
- The development of a corporate travel policy which seeks to encourage the use of public transport and minimise the use of air travel. The reductions associated with this initiative is expected to be recognised in the FY19/20 reporting year.

3. Emissions summary

Table 1. Emissions Summary		
Scope	Emission source	t CO ₂ -e
2	Electricity	116.0
3	Electricity – transmission and distribution losses	15.6
3	Electricity – base building	287.3
3	Telecommunications	55.1
3	Water	2.7
3	IT Equipment	70.6
3	Carbon Neutral Office Paper	0.0
3	Stationery	10.0
3	Office furniture	83.9
3	Employee Commute	192.7
3	Business Flights	1,910.9
3	Cleaning Services	4.9
3	Food & Catering	40.3
3	Postage	53.5
3	Printing	52.8
3	Domestic Hotel Accommodation	33.9
3	International Hotel Accommodation	11.6
3	Advertising	89.9
3	Taxis	21.1
3	Waste-landfill	34.2
Total Gross Emissions		3,087.0
GreenPower or retired LGCs		0
Total Net Emissions		3,087.0

4. Carbon offsets

4A. Offsets summary

Table 2. Offsets Summary						
Projects supported by offset purchase	Eligible offset units	Registry	Cancellation date	Serial numbers (including hyperlink to registry transaction record)	Vintage	Quantity
Wind Power Project in Tirupur District, India	VCUs	APX	6 Jan 2020	7149-374429863-374432484-VCU-050-APX-IN-2018-2019 1163-01012018-07012019-0 https://vcsregistry2.apx.com/myModule/rpt/myrpt.asp?r=206&h=29358		2,622
Northern Savanna Project, Australia			7 Jan 2020	3,786,659,685-3,786,659,884	2019-20	200
Protection of a Tasmanian Native Forest, Australia	VCUs	APX	7 Jan 2020	3229-145734596-145734863-VCU-016-MER-AU-2012-2013 587-01032012-28022013-0		268
Total offsets cancelled						3,090
Total offsets banked for use future years: (if any) [include serial numbers]						

4B. Offsets purchasing and retirement strategy

Cromwell reports emissions on a financial year basis and purchases and retires offsets in arrears.

5. Have you done more?

Cromwell is certified in accordance with *ISO14001: Environmental Management Systems* and is formally recognized as a supporter of the *Task Force on Climate-Related Financial Disclosures (TCFD)*. Following assessment of FY19 emissions, continuous improvement measures have been implemented to assist with the quality of data being recorded for scope 3 emissions to identify opportunities for reductions and a global emissions management plan is expected to be implemented within the next reporting period.

Individual Retirement Confirmations

1

VCS Administrator <vcs@apx.com> Tim Worrall 10:59

APX VCS Registry: Notification of Verified Carbon Unit (VCU) Retirement

This email is to acknowledge that on Jan 6 2020 11:58PM, Tasman Environmental Markets Pty Ltd retired 2622 APX VCS Registry Verified Carbon Units (VCUs). The VCUs were issued in accordance to Verified Carbon Standard protocols, which prescribe a rigorous carbon offset project registration and verification process used to ensure the originating offset project contributes to real and additional emission reductions. The issuance and ownership of these VCUs has been tracked in VCS Registries using unique serial numbers to prevent double counting or double selling. Now that these VCUs have been retired from the registry **permanently**, no one else can hold or retire the VCUs. Details about the VCUs are listed below.

Quantity of retired VCUs: 2622
VCU serial numbers: 7149-374429863-374432484-VCU-050-APX-IN-1-1163-01012018-07012019-0
Date of retirement: Jan 6 2020 11:58PM
Beneficial Owner: Cromwell Group Pty Limited
VCU retirement reason details: NCOS Programme; Cancelled on behalf of Cromwell Group Pty Limited to meet its carbon neutral claim against the National Carbon Offset Standard for the FY 19 period
Public URL: <https://vcsregistry2.apx.com/myModule/rpt/myrpt.asp?c=206&h=29358>

Originating carbon offset project: Wind Power Project in Tirupur District
Project type: Energy industries (renewable/non-renewable sources)
Project country: IN

Visit <http://vcsregistry.com> for more information about The APX VCS Registry. You can view public reports listing retired VCUs and additional information about the offset project, including project documentation.

2

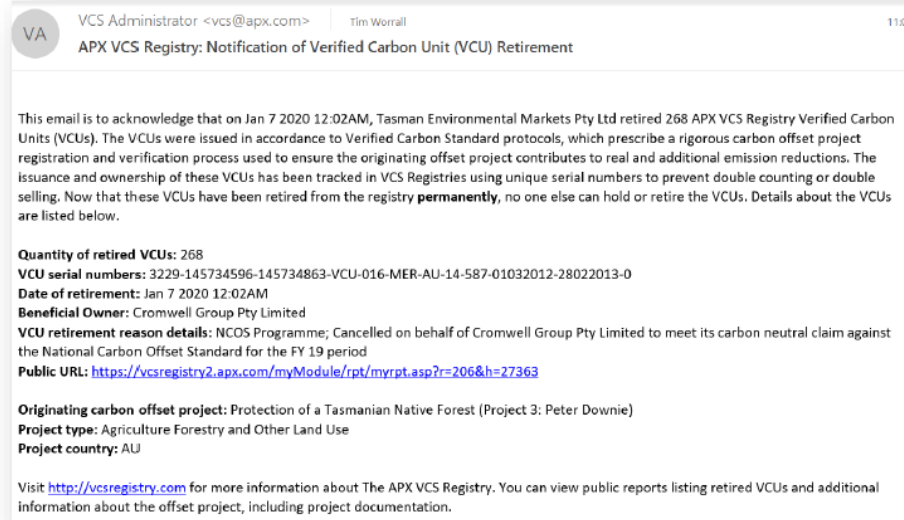
Transaction ID	AU13863
Current Status	Completed (4)
Status Date	07/01/2020 12:27:18 (AEDT) 07/01/2020 01:27:18 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Grant, Andrew William Thorold
Transaction Approver	Grant, Andrew William Thorold
Comment	Cancelled on behalf of Cromwell Group Pty Limited to meet its carbon neutral claim against the National Carbon Offset Standard for the FY 19 period.

Transferring Account		Acquiring Account	
Account Number	AU-2734	Account Number	AU-1008
Account Name	Tasman Environmental Markets Pty Ltd	Account Name	Australia Voluntary Cancellation Account
Account Holder	Tasman Environmental Markets Pty Ltd	Account Holder	Commonwealth of Australia

Transaction Blocks													
Party	Type	Transaction Type	Original CP	Current CP	ERF Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AU	KACCU	Voluntary ACCU Cancellation			ERF104944					2019-20		3,786,659,885 - 3,786,659,884	200

Individual Retirement Confirmations

3



Retirement Certificate Reference No.: CROM-1019