

PUBLIC DISCLOSURE STATEMENT

SHOAL GROUP PTY LTD

ORGANISATION CERTIFICATION 1 JULY 2022 – 30 SEPTEMBER 2023

Australian Government

Climate Active Public Disclosure Statement





Climate

NAME OF CERTIFIED ENTITY	Shoal Group Pty Ltd
REPORTING PERIOD	1 July 2022 – 30 September 2023 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.
	Paul Greenhalf Chief Operating Officer 6 May 2024



Australian Government

Department of Climate Change, Energy, the Environment and Water

Public Disclosure Statement documents are prepared by the submitting organisation. The material in the Public Disclosure Statement document 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 Statement document and disclaims liability for any loss arising from the use of the document for any purpose.

Version August 2023.



1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	542 tCO ₂ -e
CARBON OFFSETS USED	30% ACCUs, 70% VCUs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: Shoal Group Pty Ltd
TECHNICAL ASSESSMENT	Date: 23/12/2020 Name: Lauren Jensen Organisation: Pangolin Associates Pty Ltd Next technical assessment due: N/A (withdrawn from program)

Contents

1.	Certification summary	3
2.	Certification information	4
3.	Emissions boundary	6
4.	Emissions reductions	8
5.	Emissions summary	.10
6.	Carbon offsets	.12
7. Re	enewable Energy Certificate (REC) Summary	.16
Арре	endix A: Additional Information	.16
Appe	endix B: Electricity summary	.16
Appe	endix C: Inside emissions boundary	.19
Арре	endix D: Outside emissions boundary	20



2. CERTIFICATION INFORMATION

Description of certification

Shoal Group Pty Ltd is certified carbon neutral against the Climate Active Carbon Neutral Standard for Organisations for all its Australian direct business operations. This report is a combined report for Shoal's third year of certification (FY22-23) and a partial fourth year of certification (FY23-24) up to 30 September 2023, as per the terms of Shoal's withdrawal from the Climate Active Program.

Organisation description

Shoal Group Pty Ltd (Shoal[™]), ABN 49 604 474 204, is a leading systems engineering services firm that works across the defence, transport, infrastructure and space sectors. Headquartered in Adelaide with a distributed team across Australia, the company works with clients to define and deliver some of Australia's most complex technical projects. Over more than a decade, Shoal has grown a culture where people are enabled by diversity of thought, high levels of investment in technology-intensive education and training and innovative approaches to collaboration to become a thought leader, with the highest number of professionally accredited systems engineers in Australia.

We are leaders in Systems Thinking. We use it to help clients define, manage and deliver big projects in complex environments; the kinds of projects that you dream of, but then have nightmares trying to figure out. These projects often have lots of moving pieces that are interrelated and technically challenging, so we use a rigorous, complex systems engineering approach, based on best practices gleaned from around the world (amongst which are our own). When we do this, all the pieces of the system come together to enable our clients to make better decisions, adapt, avoid risks and achieve objectives.

When developing solutions, we focus on understanding the whole system, its environment and the complex interactions of its elements. We help our clients clearly define the complex problems they are facing and design solutions they can trust.

The operational control approach was used to establish the certification boundary.



Sustainability at Shoal Group

Shoal is committed to sustainable operations and business growth and strives to be a thought leader within the Australian community. As systems thinkers, Shoal works to embody sustainable design in the early phases of development. Using Systems Thinking techniques, our practices strive to minimise unnecessary resource consumption and waste and increase the lifecycle of products and services.

Our clients look to us to provide the best solution, not just for them, but for their stakeholders and wider community too. As a wholly Australian owned business, we invest in our community and want to see it thrive. We do things differently at Shoal. We want our people to do their best, so we do our best for our people.

In 2021, Shoal became the first systems engineering firm to be certified Carbon Neutral by Climate Active. This has brought increased awareness of Shoal's emissions profile, facilitated emissions reduction activities, and ensured Shoal is accountable for the impact business operations have on the environment. The lessons learnt through Shoal's participation in the Climate Active program have been invaluable. Although Shoal has withdrawn from the program, culminating with this Public Disclosure Statement (PDS), these lessons will continue to guide Shoal's environmental strategy and actions into the future. At Shoal, we are now turning focus to making positive and impactful contributions in the communities we operate in, consistent with a 'think globally, act locally' approach, by supporting initiatives that promote sustainability and environmental action, and enabling our people to engage in these activities.



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.



Inside emissions boundary



Outside emission boundary

Excluded

Facilities at which work is undertaken but are not operated by Shoal.

Data management plan for non-quantified sources

The data management plan below outlines how more rigorous quantification can be achieved for material (greater than 1%) non-quantified emission sources.

Shoal Group has attempted source the unavailable data; namely, water consumption and refrigerant details, during the current reporting period, however, was unsuccessful. Water usage is currently included within rent and cannot be quantified. Further, a suitable method for measuring refrigerants has not yet been identified.



4. EMISSIONS REDUCTIONS

Shoal is committed to creating positive change in the communities we operate in, consistent with a 'think globally, act locally' approach, by supporting initiatives that promote sustainability and environmental action, and enabling our people to engage in these activities. Although withdrawing from the Climate Active program, Shoal will continue to responsibly lead the way forward, striving to manage, monitor, and reduce its impact on the environment inclusive of waste, emissions, and energy-use. Further, in delivering design services to our clients, Shoal will strive to incorporate principles of sustainable design. Shoal hopes that this indirect influence will reduce the environmental impact of products and services produced by Shoal's clients. Shoal will foster a culture of continual improvement and awareness of the environmental impact of its activities. Shoal 's Environmental Policy and Environmental Sustainability Manual encompasses and codifies our actions and accountability.

Emissions reduction strategy

Shoal aims to reduce all emissions (Scope 1, 2, and 3) by 2 % relative to the average full time equivalent (FTE) staff each year from a FY2022 base year, for the next five years (until FY2027). This reduction is an emissions intensity target calculated as (tCO2-e / FTE).

In the previous reporting period Shoal had 85.5 FTE staff and emissions totalled 421.19 t CO₂-e, resulting in an emissions intensity of 4.92 t CO₂-e/FTE. In the current reporting period Shoal had 92.8 FTE staff and emissions totalled 541.06 t CO₂-e, resulting in an emissions intensity of 5.83 t CO₂-e/FTE. This is an 18.7 % increase in emissions intensity. However, as the current reporting period has the nonstandard duration of 15 months, this is a misleading comparison. Considering the average monthly emissions from the current reporting period applied to a 12-month duration yields 432.8 t CO₂-e and an emissions intensity of 4.66 t CO₂-e/FTE. This is a decrease in emissions of 5.1 % indicating that Shoal is on track to meet its emissions reduction target.

The emissions reduction strategy for business operations includes the following actions -

Shoal will reduce emissions intensity by, where possible and without negatively affecting business operations, eliminating emission producing activities that are not deemed required for business operation, as assessed by Shoal's Corporate Leadership Team. Remaining activities that are deemed required for business operation will be assessed to identify opportunities for emission reduction through the following measures –

- Activity substitution Determine whether an alternative, lower emission activity can provide an equivalent level of goods and/or service.
- Activity efficiency gain Determine whether emissions can be reduced by increasing the efficiency of the existing activity, while providing an equivalent level of goods and/or service.
- Provider substitution Where the activities are performed by third party services, determine whether an alternative carbon neutral provider can provide an equivalent level of goods and/or service.



Shoal will complete the following tasks to reduce emissions over the next year -

- Engage with staff to foster a culture of awareness of the environmental impact of our activities.
- Engage with our local communities to create positive and impactful change, by supporting initiatives that promote sustainability and environmental action, and enabling our people to engage in these activities.

Emissions reduction actions

The following measures have been put in place this reporting period to reduce emissions. Shoal will continue to implement and expand these measures over the next year to further reduce emissions –

- Hosted a 'Systems Thinking and Volunteering Day' at <u>The Forktree Project</u> to promote direct environmental action and stewardship. The Forktree Project is a registered charity aiming to return a 133-acre former pastoral property in South Australia's Fleurieu Peninsula back to nature. Shoal staff contributed by planting over 200 native trees, shrubs, and grasses, and participated in a workshop focused on how systems thinking can help to understand and solve complex problems such as biodiversity loss and climate change. In future years, Shoal intends to partner with organisations and charities like The Forktree Project to make positive and tangible contributions to our local communities.
- Provision of a soft plastics recycling bin at the Shoal Adelaide office through a program run by <u>curby</u> and a partnership with the City of Adelaide Council and the Central Adelaide Waste and Recycling Authority.
- Incentivised the use of public and active transport to work by holding monthly 'Public and Active Transport to Work Days'. Staff who use active (bicycle, walk, run, etc...) or public (bus, train, tram, etc...) transport to commute to the office on these days were provided with free breakfast and coffee. Staff are also encouraged to organise group bicycle rides to the office in line with our corporate value of sociability.
- Purchase of keep-cups for all staff to reduce waste from disposable single use coffee cups.
- Monitoring of cloud computing, data storage, and software requirements to identify and decrease unnecessary data storage and expenditure.
- Encouraging alternative options to air travel for meetings, including alternative modes of transport (e.g., trains) and teleconferencing.
- Ensuring all employees are equip with laptops and workstations with multiple screens to minimise printing and ensure ability to comfortably work from home.
- Promoting sustainable practice and raising staff awareness of environmentally focused initiatives and events through a regular agenda item during staff all-in meetings.



5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year										
	Total tCO2-e (without uplift) Total tCO2-e (with uplift)									
Base year/Year 1:	2020–21	238.81	250.75							
Year 2:	2021–22	401.13	421.19							
Year 3:	1 July 2022 – 30 Sept 23	515.29	541.06							

Significant changes in emissions

Overall, there has been a 28.5 % increase in total emissions. In part, this is because the current reporting period is three months (25 %) longer than the previous reporting period, in accordance with the terms and obligations set out in the withdrawal letter from Climate Active. The increase in total emissions can also be attributed to fluctuation in business travel and associated accommodation, once off emissions associated with the fit out of the Shoal Wright Street Office which occurred April 2022 hence did not repeat in the current reporting period, improved reporting, and business growth. It is also noted that the period ending 30 June 2022 was impacted by the COVID-19 pandemic, reducing the amount of travel that occurred.

Emission source	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Short economy class flights	41.105	142.68	Required business travel varies from year
(>400km, ≤3,700km)			to year based on corporate and client
			requirements.

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

N/A



Emissions summary

The electricity summary is available in Appendix B. Electricity emissions were calculated using a locationbased approach.

Emission category	Scope 1 emissions (t CO ₂ -e)	Scope 2 emissions (t CO ₂ -e)	Scope 3 emissions (t CO ₂ -e)	Total emissions (t CO₂-e)
Accommodation and facilities	0.00	0.00	36.65	36.65
Cleaning and Chemicals	0.00	0.00	6.57	6.57
Electricity	0.00	17.46	5.59	23.05
Food	0.00	0.00	22.58	22.58
ICT services and equipment	0.00	0.00	8.97	8.97
Office equipment and supplies	0.00	0.00	13.77	13.77
Postage, courier and freight	0.00	0.00	1.03	1.03
Products	0.00	0.00	4.10	4.10
Professional services	0.00	0.00	97.99	97.99
Transport (air)	0.00	0.00	189.13	189.13
Transport (land and sea)	0.00	0.00	83.40	83.40
Waste	0.00	0.00	13.69	13.69
Working from home (Australia)	0.00	0.00	12.91	12.91
Working from home (international)	0.00	0.00	1.47	1.47
Total	0.00	17.46	497.83	515.30

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	tCO ₂ -e
Uplift to account for non-quantified sources where data are unavailable (Water and Refrigerants)	25.76
Total emissions footprint to offset (total emissions from summary table + total of all uplift factors)	541.06



6.CARBON OFFSETS

Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emissions to offset are 541.06 tCO₂-e. The total number of eligible offsets used in this report is 542. Of the total eligible offsets used, 11 were previously banked and 531 were newly purchased and retired. There are no offsets that have been banked for future use.

Co-benefits

Tiwi Islands, NT, Aboriginal Savanna Burning Project for Greenhouse Gas Abatement

In the Tiwi Islands, savanna burning is an important carbon farming project that is delivered in partnership with Tiwi Land Council and Charles Darwin University. Savanna burning is a fire management method that prevents destructive bushfires (prevalent in tropical savannas of northern Australia) by reducing the fuel load in a controlled manner and therefore reducing greenhouse gas emissions. By practicing traditional patchwork burning in the early dry season when fires are cooler and by burning less country, there are fewer emissions released and more carbon is stored in the soil and plants, keeping the land healthy for the Tiwi people.

This method generates Australian Carbon Credit Units (ACCUs) and in turn brings environmental, social, and cultural co-benefits such as:

- Elders sharing traditional ecological knowledge with young people;
- Protection of rock art and sacred sites;
- Protection of the environment by Aboriginal led land and sea management;
- Meaningful employment aligning with the interests and values of Traditional Owners; and
- Contribution to increased pride and self-esteem of Indigenous people.

Wind Power Project by Axis Wind Farms

This purpose of this project is to generate renewable electricity from the installation of a 105 MW wind farm in the Anantapur district of Andhra Pradesh, India. Over the first 10 years of the project, it is estimated that this project will reduce emissions by 198,183 t CO₂-e as the green energy produced will replace thermal and fossil fuel-based power plants, which the area would otherwise be reliant on. This project will result in employment opportunities for local communities during construction and operation phases and will contribute to further infrastructure development in the region including the upgrade of roads and other civil infrastructure.



Eligible offsets retirement summary

Offsets retired for Climate Active 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 (%)
Tiwi Islands Savanna Burning for Greenhouse Gas Abatement	ACCUs	ANREU	22 Dec 2023	3,773,001,101 – 3773,001,159	2018-19	-	150	0	0	150	28%
Renewable Wind Power Project by Axis Wind Farms (Rayalaseema) Pvt. Ltd	VCUs	Verra	21 Dec 2023	<u>15317-682381884-</u> <u>682382264-VCS-VCU-1491-</u> <u>VER-IN-1-2052-01012022-</u> <u>31032022-0</u>	2022	-	381	0	0	381	70%
Strathburn Station	ACCUs	ANREU	08 Nov 2022	8,345,965,749 – 8,345,965,848	2021-22	-	100	89	0	11	2%
Total eligible offsets retired and used for this report											
	Total eligible offsets retired this report and banked for use in future reports 0										

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Australian Carbon Credit Units (ACCUs)	161	30%
Verified Carbon Units (VCUs)	381	70%



Transaction ID	AU31584
Current Status	Completed (4)
Status Date	22/12/2023 11:44:57 (AEDT) 22/12/2023 00:44:57 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Stuart, Benjamin Mathew Clarke
Transaction Approver	Rockliff, Nathan Stephen
Comment	Retired for Shoal Group Climate Active Carbon Neutral offset for period ending 30 September 2023

Transferring Account

Acquiring Account

-			
Account Number	AU-2321	Account Number	AU-1068
Account Name	Carbon Financial Services Pty. Ltd.	Account Name	Australia Voluntary Cancellation Account
Account Holder	Carbon Financial Services Pty. Ltd.	Account Holder	Commonwealth of Australia

Transaction Blocks

<u>Party</u>	<u>Type</u>	Transaction Type	Original CP	Current CP	<u>ERF Project</u> <u>ID</u>	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	<u>Vintage</u>	<u>Expiry</u> Date	<u>Serial Range</u>	<u>Quantity</u>
AU	KACCU	Voluntary ACCU Cancellation			ERF105045					2018-19		3,773,001,010 - 3,773,001,159	150

Transaction Status History

Status Date	Status Code
22/12/2023 11:44:57 (AEDT) 22/12/2023 00:44:57 (GMT)	Completed (4)
22/12/2023 11:44:57 (AEDT) 22/12/2023 00:44:57 (GMT)	Proposed (1)
22/12/2023 11:44:57 (AEDT)	Account Holder Approved (97)



Transaction ID	AU24667
Current Status	Completed (4)
Status Date	08/11/2022 16:02:54 (AEDT) 08/11/2022 05:02:54 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Stuart, Benjamin Mathew Clarke
Transaction Approver	Rockliff, Nathan Stephen
Comment	Retired on behalf of Shoal Group Pty Ltd for Climate Active FY2022 carbon-neutral certification

Transferring Account

Acquiring Account

Account Number	AU-2321	Account Number	AU-1068
Account Name	Carbon Financial Services Pty. Ltd.	Account Name	Australia Voluntary Cancellation Account
Account Holder	Carbon Financial Services Pty. Ltd.	Account Holder	Commonwealth of Australia

Transaction Blocks

Party	Туре	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			EOP100917					2021-22		8,345,965,749 - 8,345,965,848	100

Transaction Status History

Status Date	Status Code
08/11/2022 16:02:54 (AEDT) 08/11/2022 05:02:54 (GMT)	Completed (4)
08/11/2022 16:02:54 (AEDT) 08/11/2022 05:02:54 (GMT)	Proposed (1)
08/11/2022 16:02:54 (AEDT) 08/11/2022 05:02:54 (GMT)	Account Holder Approved (97)
08/11/2022 16:01:17 (AEDT) 08/11/2022 05:01:17 (GMT)	Awaiting Account Holder Approval (95)



7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

N/A

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 location-based approach.



Market Based Approach Summary			
Market Based Approach	Activity Data (kWh)	Emissions (kg CO2-e)	Renewable Percentage of total
Behind the meter consumption of electricity generated	0	0	0%
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)	13,132	0	19%
Residual Electricity	56,721	54,168	0%
Total renewable electricity (grid + non grid)	13,132	0	19%
Total grid electricity	69,853	54,168	19%
Total electricity (grid + non grid)	69,853	54,168	19%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	56,721	54,168	
Scope 2	50,091	47,837	
Scope 3 (includes T&D emissions from consumption under operational control)	6,630	6,331	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	18.80%
Mandatory	18.80%
Voluntary	0.00%
Behind the meter	0.00%
Residual scope 2 emissions (t CO2-e)	47.84
Residual scope 3 emissions (t CO2-e)	6.33
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	47.84
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	6.33
Total emissions liability (t CO2-e)	54.17
Figures may not sum due to rounding. Renewable percentage can be above 100%	



Location Based Approach Sum	mary					
Location Based Approach	Activity Data (kWh) total	Unc	ler operationa	l control	No operati	ot under onal control
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kg CO2-e)	Scope 3 Emissions (kg CO2-e)	(kWh)	Scope 3 Emissions (kg CO2-e)
SA	69,853	69,853	17,463	5,588	0	0
Grid electricity (scope 2 and 3)	69,853	69,853	17,463	5,588	0	0
SA	0	0	0	0		
Non-grid electricity (behind the meter)	0	0	0	0		
Total electricity (grid + non grid)	69,853					

Residual scope 2 emissions (t CO ₂ -e)	17.46
Residual scope 3 emissions (t CO ₂ -e)	5.59
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	17.46
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	5.59
Total emissions liability (t CO ₂ -e)	23.05



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. <u>Cost effective</u> 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
Water	Data unavailable (but uplift applied and data plan in place)
Refrigerants	Data unavailable (but uplift applied and data plan in place)

Data management plan for non-quantified sources

The data management plan below outlines how more rigorous quantification can be achieved for material (greater than 1%) non-quantified emission sources.

Shoal Group has attempted source the unavailable data; namely, water consumption and refrigerant details, during the current reporting period, however, was unsuccessful. Water usage is currently included within rent and cannot be quantified. Further, a suitable method for measuring refrigerants has not yet been identified. Shoal Group will continue to liaise with the landlord to obtain the unavailable data in the future.



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:

- 1. <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.
- <u>Risk</u> The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.
- 4. **<u>Stakeholders</u>** Key stakeholders deem the emissions from a particular source are relevant.
- <u>Outsourcing</u> 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.

The only facility at which work is undertaken that was deemed relevant is the Wright Street (Adelaide) office. Activities undertaken at client facilities are within the boundaries of those organisations. Small office spaces leased from WeWork in other states have been excluded as they have been assessed as not relevant according to the relevance test.



Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
DST Edinburgh	Y	N	N	N	N	 Size: Approximately 10 FTE worked at DST Edinburgh throughout the reporting period. Emissions associated with this work may be a material portion of total emissions. Influence: This is a client site which sits outside Shoal's organisational boundary and Shoal does not have the potential to influence the emissions from this source. 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, including the public, are unlikely to consider this a relevant source of emissions for our business. Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertaken this activity within our emissions boundary and comparable organisations do not typically
DST Fairbairn	Ν	Ν	Ν	Ν	N	 undertake this activity within their boundary. Size: Approximately 5 FTE worked at DST Fairbairn throughout the reporting period. Emissions from this site are unlikely to contribute significantly to total emissions. Influence: This is a client site which sits outside Shoal's organisational boundary and Shoal does not have the potential to influence the emissions from this source. 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, including the public, are unlikely to consider this a relevant source of emissions for our business. Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.
Russell Offices	N	N	N	N	N	 Size: Approximately 4 FTE worked at Russell Offices throughout the reporting period. Emissions from this site are unlikely to contribute significantly to total emissions. Influence: This is a client site which sits outside Shoal's organisational boundary and Shoal does not have the potential to influence the emissions from this source.



Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
						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, including the public, are unlikely to consider this a relevant source of emissions for our business.
						Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.
						Size: Approximately 3 FTE worked at CBRIN throughout the reporting period. Emissions from this site are unlikely to contribute significantly to total emissions.
						Influence: This is a co-working space which sits outside Shoal's organisational boundary and Shoal does not have the potential to influence the emissions from this source.
CBRIN	Ν	Ν	Ν	Ν	Ν	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, including the public, are unlikely to consider this a relevant source of emissions for our business.
						Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.
						Size: Approximately 3 FTE worked at WeWork Sydney throughout the reporting period. Emissions from this site are unlikely to contribute significantly to total emissions.
						Influence: This is a co-working space which sits outside Shoal's organisational boundary and Shoal does not have the potential to influence the emissions from this source.
WeWork Sydney	Ν	Ν	Ν	Ν	I N	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, including the public, are unlikely to consider this a relevant source of emissions for our business.
						Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.







An Australian Government Initiative