PUBLIC DISCLOSURE STATEMENT

AL NERO TRADING TRUST & OTHERS
(TRADING AS BENTLEYS SA AND NT)

ORGANISATION CERTIFICATION

FY2023–24

Australian Government

Climate Active
Public Disclosure Statement

An Australian Government Initiative

NAME OF CERTIFIED ENTITY	AL NERO TRADING TRUST & OTHERS (TRADING AS BENTLEYS SA and NT)
REPORTING PERIOD	1 July 2023 – 30 June 2024 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 Papa Parter of Business Advancement & Assurance 19 November 2024

Australian Government
Department of Climate Change, Energy, the Environment and Water

Version 9

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	365 tCO_2-e
OFFSETS USED	100% VCU
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: AL NERO TRADING TRUST & OTHERS (TRADING AS BENTLEYS SA and NT)
TECHNICAL ASSESSMENT	21 October 2023 Winton Evers Ecoprofit Management Pty Ltd Next technical assessment due: FY 2026

Contents

2.CARBON NEUTRAL INFORMATION

Description of certification

This carbon neutral organisation certification is for the business operations of Bentleys SA and NT (ABN 74 852 475 418) as the trading name for Al Nero Trading Trust & Others.

The operational emission boundary has been defined using the operational control approach. Please note that the business operations and offices that sit outside of Bentleys SA/NT (which is mainly operated from on site at premises – 63, Pirie Street, Adelaide, SA. All other offices in all other locations that are part of Bentleys National are not part of consideration for this certification or otherwise.

The carbon emission inventory in this Public Disclosure Statement covers the financial year 1 July 2023 to 30 June 2024 reporting period. It has been prepared in accordance with the Climate Active Carbon Neutral Standard for Organisation (Organisation Standard).

The methods used for collating data, calculating emissions, 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)
- Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting & reporting Standard

The greenhouse gasses considered in the reporting are the seven gases commonly reported under the Kyoto Protocol: carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3). These gases are expressed as carbon dioxide equivalents (CO2-e) using relative global warming potentials (GWPs).

Organisation description

Bentleys SA is part of Bentleys National which is an international network of advisory and accounting firms[1]. Bentleys SA is proudly independently owned and operated in South Australia for over 40 years, Bentleys SA/NT is an integrated business services and advisory firm, helping businesses and individuals achieve their goals and aspirations, and get them to where they want to be.

Our advisory, accounting, and audit services are enhanced by various specialisations, allowing us to meet the diverse needs of individuals and businesses throughout their lifecycle. Along with business advisory, accounting, audit, and tax services, we specialise in business advancements, ESG advisory, carbon accounting, financial planning and wealth management (including self-managed super funds), R&D tax incentive services, and business and residential finance, as well as corporate recovery services.

[1] Please see more information here - https://www.bentleys.com.au/about-bentleys/

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.

Non-quantified emissions have been identified as relevant and are included within the emissions boundary, but they have not been quantified in the carbon inventory. Since these items are immaterial, no uplift factor has been applied. Further detail is available at Appendix C.

Outside the emissions boundary

Bentleys has included all emissions over which it has operational control and are relevant.

Inside emissions boundary

Quantified

- Stationery energy (liquid fuels)
- Electricity
- Refrigerants
- Accommodation & facilities
- Cleaning & chemicals
- Food and catering
- ICT services & equipment
- Office equipment & supplies
- Postage, courier & freight
- Products
- Professional services
- Transport – air
- Transport – land & sea
- Water
- Working from home

Non-quantified

- Repairs & maintenance
- Hire fee – flowers & plants
- Gifts & donations
- CRM expenses

Outside emission boundary

Excluded

N/A

4.EMISSIONS REDUCTIONS

Emissions reduction strategy

We are aware of the importance of GHG impact on climate change. We have been actively tracking our own carbon footprint for three years and developed carbon reduction strategies.

Bentleys SA/NT is committed to taking positive action to reduce our overall emissions by 25% by 2028, from our 2023 base year and 35% emissions reduction by 2030 from our 2023 base year. To reach our reduction target and maintain our ongoing carbon neutrality, we will implement the following steps:

- Bentleys SA/NT will consider the purchase of 100% of electricity from renewal energy suppliers by 2028 and consider installation of LED lighting and other energy-consuming devices with high ENGERY STAR rating by 2028.
- Continued promotion of flexible working arrangements and investment in IT technology and equipment to support our people to work from home, reducing emissions from staff commuting – this is ongoing, each year Bentleys will consider improvement opportunities in relation to flexible working arrangements and apply each year.
- Development of a reward system or providing discounts on transit passes for employees for more eco-friendly commuting options, e.g. bicycles and public transportation instead of cars by 2030.
- Continued provision and expansion of virtual conferencing wherever possible to avoid business travel emissions, review of necessity of employee air travels for Bentleys national conference. This is ongoing, each year Bentleys will consider and review the necessity of employee travel and decide on the amount of travel required.
- Engagement with our products and service suppliers to identify and partner with suppliers who have made commitments for emission reduction and carbon neutrality to further reduce GHG emissions from our supply chains. Bentleys SA/NT will identify list of suppliers to change or modify and decide on the required changes by 2028.
- Development of Conscious Travel Program by 2030.
- Commencement of internal quarterly measurement of our GHG emissions to develop better insights into our emissions activity, facilitated by the enhancement of our data collection and management system for workplaces data by 2027.

Emissions reduction actions

In FY24, Bentleys SA continued to focus on reducing the environmental impact of its operations. Key emission reduction actions included:

- Bentleys SA/NT established a GHG committee to develop climate change strategy, policy and specific carbon reduction targets related to reduction opportunities; explore ways to reduce emissions in our business operations, monitor the emission targets and raise awareness on climate change among our people.
- Engaged with clients, suppliers and landlords to identify opportunities to drive efficiencies, implement circular solutions and reduce overall GHG emissions.
- Implemented a carbon education program to teach key staff of the fundamentals of carbon accounting, emission reduction techniques and carbon offset strategy over the longer term.
- Implemented improvements in the data collecting process to improve the data quality including job descriptions and work templates for maintaining flight booking records, contact lists for paper, water, waste and electricity consumption activity data; regularly conduct of employee survey to capture data for employee commute.
- We collaborate with climate change organisations, government agencies and joint initiatives to explore opportunities to reduce our carbon footprint via new technologies and incentives.

5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year		
		Total tCO_2-e
Base Year/Year 1	2022-2023	500
Year 2	2023-2024	365

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

N/A.

Emissions summary

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

	Sum of Scope 1 emissions (tCO2-e)	Sum of Scope 2 emissions (tCO2-e)	Sum of Scope 3 emissions (tCO2-e)	Sum of Total emissions (t CO2-e)
Accommodation and facilities	0.00	0.00	6.48	6.48
Cleaning and chemicals	0.00	0.00	7.55	7.55
Climate Active carbon neutral products and services	0.00	0.00	0.00	0.00
Construction materials and services	0.00	0.00	0.00	0.00
Electricity	0.00	19.92	6.37	26.30
Food	0.00	0.00	1.28	1.28
Horticulture and agriculture	0.00	0.00	0.00	0.00
ICT services and equipment	0.00	0.00	141.31	141.31
Machinery and vehicles	0.00	0.00	0.00	0.00
Office equipment and supplies	0.00	0.00	15.83	15.83
Postage, courier and freight	0.00	0.00	9.31	9.31
Products	0.00	0.00	1.68	1.68
Professional services	0.00	0.00	57.69	57.69
Refrigerants	3.19	0.00	0.00	3.19
Roads and landscape	0.00	0.00	0.00	0.00
Stationary energy (gaseous fuels)	0.00	0.00	0.00	0.00
Stationary energy (liquid fuels)	0.00	0.00	0.00	0.00
Stationary energy (solid fuels)	0.00	0.00	0.00	0.00
Transport (air)	0.00	0.00	36.68	36.68
Transport (land and sea)	0.00	0.00	52.85	52.85
Waste	0.00	0.00	0.00	0.00
Water	0.00	0.00	0.79	0.79
Working from home	0.00	0.00	3.72	3.72
Grand Total	**3.19**	**19.92**	**341.53**	**364.65**

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	tCO_2-e
N/A	N/A
Total of all uplift factors	N/A
Total emissions footprint to offset *(total emissions from summary table + total of all uplift factors)*	**N/A**

6. CARBON OFFSETS

Eligible offsets retirement summary

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Verified Carbon Units (VCUs)	365	100.00%

Project name	Type of offset unit	Registry	Date retired	Serial number	Vintage	Total quantity retired	Quantity used in previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period	Percentage of total used this reporting period
MRF wind power project in Tamilnadu managed by Enercon India Limited	VCU	Verra Registry	12/11/2024	16688-788370358-788370722-VCS-VCU-291-VER-IN-1-380-01012022-31122022-0	2022	365	0	0	365	100.00%

Co-benefits

VERRA MRF wind power project in Tamilnadu managed by Enercon India Limited (Project Id - VCS380)

Environmental

- The project activity involves use of renewable energy sources for electricity generation instead of fossil fuel-based electricity generation, thereby reducing emission reductions.
- Being a renewable resource, using wind energy to generate electricity contributes to resource conservation. Thus, the project has no negative impact on the surrounding environment contributing to environmental wellbeing.

Technical

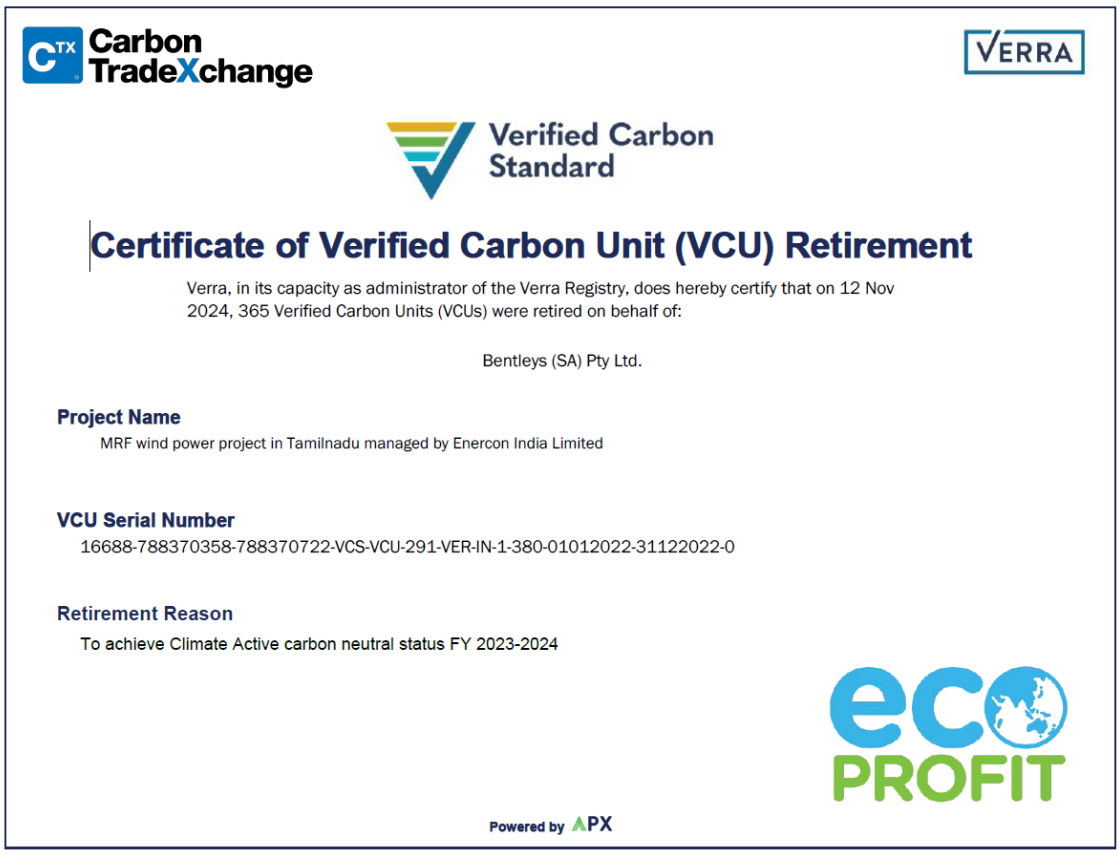
- Increased interest in wind energy projects will further push R&D efforts by technology providers to develop more efficient and better machinery in future.

Economical

- The project activity requires temporary and permanent, skilled and semi-skilled manpower at the wind park; this will create additional employment opportunities.
- The generated electricity will be fed into the western regional grid through local grid, thereby improving the grid frequency and availability of electricity to the local consumers (villagers & sub-urban habitants) which will provide new opportunities for industries and economic activities to be setup in the area thereby resulting in greater local employment, ultimately leading to overall development.

Social

- The project activity has led to the development of supporting infrastructure such as road networks etc., in the wind park location, which also provides access to the local population.
- Use of a renewable source of energy reduces the dependence on imported fossil fuels variation thereby leading increased energy security.



Carbon TradeXchange

VERRA

Verified Carbon Standard

Certificate of Verified Carbon Unit (VCU) Retirement

Verra, in its capacity as administrator of the Verra Registry, does hereby certify that on 12 Nov 2024, 365 Verified Carbon Units (VCUs) were retired on behalf of:

Bentleys (SA) Pty Ltd.

Project Name

MRF wind power project in Tamilnadu managed by Enercon India Limited

VCU Serial Number

16688-788370358-788370722-VCS-VCU-291-VER-IN-1-380-01012022-31122022-0

Retirement Reason

To achieve Climate Active carbon neutral status FY 2023-2024

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7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

The following RECs have been surrendered to reduce electricity emissions under the market-based reporting method.

1. Large-scale Generation certificates (LGCs)*	N/A
2. Other RECs	N/A

* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
Total LGCs surrendered this report and used in this report									**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 CO_2-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 certified - Precinct/Building (voluntary renewables)	0	0	0%
Climate Active certified - Precinct/Building (LRET)	0	0	0%
Climate Active certified - Precinct/Building jurisdictional renewables (LGCs surrendered)	0	0	0%
Climate Active certified - Electricity products (voluntary renewables)	0	0	0%
Climate Active certified - Electricity products (LRET)	0	0	0%
Climate Active certified - 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)	14,917	0	19%
Residual electricity	64,766	58,937	0%
Total renewable electricity (grid + non grid)	**14,917**	**0**	**19%**
Total grid electricity	**79,683**	**58,937**	**19%**
Total electricity (grid + non grid)	**79,683**	**58,937**	**19%**
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	**64,766**	**58,937**	
Scope 2	57,649	52,461	
Scope 3 (includes T&D emissions from consumption under operational control)	7,117	6,477	
Residual electricity consumption not under operational control	**0**	**0**	
Scope 3	0	0	

Total renewables (grid and non-grid)	**18.72%**
Mandatory	**18.72%**
Voluntary	**0.00%**
Behind the meter	**0.00%**
Residual scope 2 emissions (t CO_2-e)	**52.46**
Residual scope 3 emissions (t CO_2-e)	**6.48**
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**52.46**
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**6.48**
Total emissions liability (t CO_2-e)	**58.94**

Figures may not sum due to rounding. Renewable percentage can be above 100%

Location Based Approach Summary

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 (kg CO_2-e)**	**Scope 3 Emissions (kg CO_2-e)**	**(kWh)**	**Scope 3 Emissions (kg CO_2-e)**
ACT	0	0	0	0	0	0
NSW	0	0	0	0	0	0
SA	79,683	79,683	19,921	6,375	0	0
VIC	0	0	0	0	0	0
QLD	0	0	0	0	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)	**79,683**	**79,683**	**19,921**	**6,375**	**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)	**79,683**					

Residual scope 2 emissions (t CO_2-e)	**19.92**
Residual scope 3 emissions (t CO_2-e)	**6.37**
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**19.92**
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**6.37**
Total emissions liability (t CO_2-e)	**26.30**

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 one 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. **Data unavailable** 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
Repairs & maintenance	Immaterial
Hire fee – flowers & plants	Immaterial
Gifts & donations	Immaterial
CRM Expenses	Immaterial

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

N/A

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