

SOGO Mobility Limited FY22 Greenhouse Gas Inventory – Verification Report

SOGO Mobility Limited



Prepared by Fishwick Environmental Ltd (Co. number: 12863179)

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**Fishwick
Environmental**

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Private and Confidential

1. Fishwick Environmental

Having worked for leading consulting firms since 2008, Matthew Fishwick started Fishwick Environmental in 2012 as an independent environmental consultancy offering deep technical expertise in life cycle assessment (LCA), environmental product declarations (EPD), and product, organisational and supply chain environmental footprinting.

2. Introduction

SOGO Mobility Limited is a car and van leasing and rental company who are interested in understanding and reducing the greenhouse gas (GHG) emissions associated with its operation. To this end, it commissioned leading sustainability consulting firm Anthesis to determine its FY22 GHG inventory. To add additional credibility, SOGO also commissioned independent environmental consulting firm Fishwick Environmental to perform a verification exercise on this GHG inventory.

3. Scope of GHG inventory

The GHG inventory verified during this exercise was SOGO Mobility Limited's FY22 scope 1-3 carbon footprint, as documented in the following report: "SOGO_2022_GHG_inventory_report_V4_for_verif.pdf".

Key GHG inventory details comprise:

- **Standards followed:** Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Standard.
- **Reporting year:** 1st January 2022 – 31st December 2022.
- **Base year:** 1st January 2021 – 31st December 2021.
- **Consolidation approach:** operational control.
- **Operational boundaries:** scope 1, 2 and 3, comprising scope 3 categories 1, 2, 3, 6, 7, 11, 12, and 13.
- **Organisational boundaries:** Trent House and fleet vehicles.
- **GHG and global warming potentials (GWPs):** carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), and hydrofluorocarbons (HFCs) using GWP-100 GWPs from IPCC's assessment report four (AR4).
- **Secondary data:** Defra 2022 EEIO factors, Defra/Decc 2022, and ecoinvent v3.9.1 (cut-off).

- **Registered office address:** Trent House, University Way, Cranfield, Bedfordshire, United Kingdom, MK43 0AN.

4. Level of assurance

For this verification exercise a “limited” assurance level was sought. For a limited assurance engagement, the verifier reduces risk to a level that is acceptable. The verifier collects less evidence than for a “reasonable” assurance engagement but sufficient for a negative form of expression of the verification opinion. The materiality threshold for this verification was set at 5%.

5. Verification criteria

The GHG inventory has been verified against the following criteria and using ISO 14064-3:2019 as a verification standard:

- **Conformance with the requirements of GHG protocol standards:**
 - Greenhouse Gas Protocol Corporate Accounting and Reporting Standard (2004).
 - Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Standard (2011).
- **Data accuracy:** data should be accurate and can be supported, and adequate data information and control systems should be in place.
- **Principals of carbon accounting to be followed:** relevance, completeness, consistency, and transparency.

6. Verification objectives

The objectives of this limited assurance verification exercise are to confirm whether any evidence exists that the GHG emissions as declared in the organisation’s GHG inventory are not accurate, relevant, complete, consistent, transparent, and free of material error or omission. In addition, to establish whether or not conformance with the requirements of the GHG Protocol Corporate and Scope 3 standards has been achieved.

7. Verification approach

The following approach to the verification was agreed at the initiation of the project:

- Inception meeting to review objectives and approach to the review.

- Familiarisation of the assessment method, report, model, and background data.
- First pass review of the assessment followed by a short meeting to discuss initial clarification questions.
- Detailed review to consider, for example:
 - the methods used to carry out the carbon footprint are consistent with GHG Protocol (Corporate and Scope 3 standards);
 - the methods used to carry out the carbon footprint are scientifically and technically valid;
 - the data used are appropriate and reasonable study;
 - the study report is transparent and consistent;
 - checking validity of assumptions;
 - checking model for calculation errors; and
 - cross-checking data in model with underlying data, with a focus on most material areas (at least 60% of data to be evidenced for primary and secondary verification).
- It is anticipated that the review will require a number of conference calls between Anthesis and SOGO and Fishwick Environmental to discuss approach taken, data used and to go through the model.
- All non-conformities to the GHG Protocol Corporate and Scope 3 standards) will be documented, along with justification and comments for improvement in an Excel table. In addition, a list of general comments will be made in an Excel table. The comments and responses in these tables will form the basis of the limited assurance verification report.

8. Responsibilities

Anthesis is responsible for the preparation and fair presentation of the GHG inventory in accordance with the verification criteria. Fishwick Environmental is responsible for expressing an opinion on the GHG inventory based on the verification.

9. Verifier competence

Matthew Fishwick carried out this verification. Matthew is an environmental chemist and specialist consultant offering deep technical expertise in LCA, EPD, and product, organisational, and supply chain environmental footprinting. In addition, he has provided technical consultation for the development of standards (PAS 2050 and GHG Protocol) and helped write the guidance for PAS 2050. His project experience of over 17 years spans a wide range of sectors including, chemicals, oil and gas, construction, food and drink, and finance. Past clients include 3M, Lonza, BP, The American Petroleum Institute

(API), Honeywell, PepsiCo, Jotun, GSK, and Johnson & Johnson. He has PhD, MRes, MSc and BSc degrees in environmental chemistry and is a member of the Royal Society of Chemistry (MRSC).

Matthew has carried out many critical reviews of LCAs and verifications of GHG inventories, both independently and as a subcontractor for global consulting firms and assurance companies. In addition, he is an approved verifier for the two largest EPD programmes in Europe and has carried out many verifications of EPDs for these programmes.

10. Conflict of interest

A review of potential conflict of interest (COI) was carried out by Fishwick Environmental and it was established that there was no pre-existing relationship between SOGO and Fishwick Environmental and therefore the potential for conflict of interest does not exist between verifier and participant. As per Fishwick Environmental's internal procedure, the risk for conflict of interest remains low and medium up until five years of verification activities, and before the sixth year of verification another verifier should be appointed.

11. Verification opinion

Fishwick Environmental performed a verification exercise to obtain the information, explanations, and evidence that it considered necessary to provide a limited level of assurance based the verification approach prepared at project initiation. The verification was conducted in regard to SOGO's GHG emissions inventory, reporting, and supporting records for the reporting year FY22 (calendar year 2022). The assessment included the collection of evidence supporting the reported data and multiple checks of compiled data, GHG emissions factors, calculation methodologies, data collection and management systems and referenced verification criteria and reporting standards.

A number of issues were raised throughout the verification exercise via an issues log, which are documented in Table 2 and Table 3 in Appendix A. Satisfactory responses were provided and correction action was carried out by Anthesis to enable all issues in the issues log to be closed out.

The findings of the verification exercise, with reference to the verification criteria are as follows:

- **Conformance with the requirements of GHG protocol standards:** all requirements of the GHG Protocol Corporate and Scope 3 standards have been met.
- **Data accuracy:** checks against supporting evidence provided has confirmed accuracy in all material aspects and that adequate data information and control systems are in place.
- **Principals of carbon accounting:**
 - Relevance: applicable and appropriate GHG sources, GHG sinks, GHG reservoirs, data and methods were identified and selected for the project. Where sources or sinks have been deemed irrelevant or insignificant, justification was provided.
 - Completeness: all relevant GHG emissions and removals were quantified following the quantification method described in the reports. A conservative approach for boundaries and calculations was used to ensure that GHG emissions were not under-estimated. Exclusions were described and justified.
 - Consistency: a consistent approach of activity data collection and calculations was used.
 - Transparency: the reports disclose sufficient and appropriate GHG related information to allow the intended audience to make decisions with reasonable confidence.

Therefore, based on the data and information provided by SOGO and Anthesis, Fishwick Environmental concludes with limited assurance that there is no evidence to suggest that SOGO's FY22 GHG inventory is not materially correct, is not a fair representation of the GHG emissions data and information, and has not been prepared in accordance with the verification criteria.

SOGO's verified GHG inventory for FY22 is provided in Table 1.

Table 1 – SOGO's verified GHG inventory for FY22

Scope	GHG emissions (tCO ₂ e) – location-based	GHG emissions (tCO ₂ e) – market-based
1	267.9	267.9
2	12.4	17.4
3	83,179	83,179
Total	83,459	83,465

Yours sincerely,



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31.05.2024

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12. Disclaimer

Fishwick Environmental Ltd has prepared this verification report for the sole use of the client and for the intended purposes as stated in the agreement between Fishwick Environmental and the client under which this report was completed. Fishwick Environmental has exercised due and customary care in preparing this report but has not, save as specifically stated, independently verified information provided by others. No other warranty, express or implied, is made in relation to the contents of this report. The use of this report, or reliance on its content, by unauthorised third parties without written permission from Fishwick Environmental shall be at their own risk, and Fishwick Environmental accepts no duty of care to such third parties. Any recommendations, opinions or findings stated in this report are based on facts and circumstances as they existed at the time the report was prepared. Any changes in such facts and circumstances may adversely affect the recommendations, opinions or findings contained in this report. Fishwick Environmental accepts no responsibility for any environmental claims that are released based on this study.

Appendix A – issues log

Table 2 – issues log relating to conformance to the GHG Protocol – Corporate Accounting and Reporting Standard and Corporate Value Chain (Scope 3) Standard

Category	Requirement	Comment type	Conforms to requirement (Yes or No) at start of review	Reviewer comment/ recommendation	Practitioner of the study response	Conforms to requirement (Yes or No) at end of review
Principals	GHG accounting and reporting shall be based on the following principles: relevance, completeness, consistency, transparency and accuracy.	n/a	Yes	n/a	n/a	Yes
Scope	Companies shall account for and report their consolidated GHG data according to either the equity share or control approach as presented below. If the reporting company wholly owns all its operations, its organizational boundary will be the same whichever approach is used. For companies with joint operations, the organizational boundary and the resulting emissions may differ depending on the approach used. In both wholly owned and joint operations, the choice of approach may change how emissions are categorized when operational boundaries are set	n/a	Yes	n/a	n/a	Yes
	When using the control approach to consolidate GHG emissions, companies shall choose between either the operational control or financial control criteria.	n/a	Yes	n/a	n/a	Yes
	Once a corporate consolidation policy has been selected, it shall be applied to all levels of the organization.	n/a	Yes	n/a	n/a	Yes
	Companies shall separately account for and report on scopes 1 and 2 at a minimum.	n/a	Yes	n/a	n/a	Yes
	Direct CO2 emissions from the combustion of biomass shall not be included in scope 1 but reported separately.	CA	Yes	n/a	n/a	Yes
Quantification of GHG	GHG emissions not covered by the Kyoto Protocol, e.g. CFCs, NOx, etc. shall not be included in scope 1 but may be reported separately.	n/a	Yes	n/a	n/a	Yes

Category	Requirement	Comment type	Conforms to requirement (Yes or No) at start of review	Reviewer comment/recommendation	Practitioner of the study response	Conforms to requirement (Yes or No) at end of review
emissions and removals	Companies shall choose and report a base year for which verifiable emissions data are available and specify their reasons for choosing that particular year.	CA	Yes	n/a	n/a	Yes
	Companies shall develop a base year emissions recalculation policy, and clearly articulate the basis and context for any recalculations. If applicable, the policy shall state any “significance threshold” applied for deciding on historic emissions recalculation.	CA	Yes	n/a	n/a	Yes
Reassessment	<p>The following cases shall trigger recalculation of base year emissions:</p> <ul style="list-style-type: none"> • Structural changes in the reporting organization that have a significant impact on the company’s base year emissions. A structural change involves the transfer of ownership or control of emissions-generating activities or operations from one company to another. <p>While a single structural change might not have a significant impact on the base year emissions, the cumulative effect of a number of minor structural changes can result in a significant impact. Structural changes include:</p> <ul style="list-style-type: none"> • Mergers, acquisitions, and divestments • Outsourcing and insourcing of emitting activities • Changes in calculation methodology or improvements in the accuracy of emission factors or activity data that result in a significant impact on the base year emissions data • Discovery of significant errors, or a number of cumulative errors, that are collectively significant. 	n/a	n/a	n/a	n/a	n/a
	In summary, base year emissions shall be retroactively recalculated to reflect changes in the company that would otherwise compromise the consistency and relevance of the reported GHG emissions information. Once a company has determined its policy on how it will recalculate base year emissions, it shall apply this policy in a consistent manner. For example, it shall recalculate for both GHG emissions increases and decreases.	n/a	n/a	n/a	n/a	n/a
Reporting	Reported information shall be “relevant, complete, consistent, transparent and accurate.” The GHG Protocol Corporate Standard requires reporting a minimum of scope 1 and scope 2 emissions.	n/a	Yes	n/a	n/a	Yes

Category	Requirement	Comment type	Conforms to requirement (Yes or No) at start of review	Reviewer comment/ recommendation	Practitioner of the study response	Conforms to requirement (Yes or No) at end of review
	<p>A public GHG emissions report that is in accordance with the GHG Protocol Corporate Standard shall include the following information:</p> <p><i>Description of the company and inventory boundary:</i></p> <ul style="list-style-type: none"> • An outline of the organizational boundaries chosen, including the chosen consolidation approach. • An outline of the operational boundaries chosen, and if scope 3 is included, a list specifying which types of activities are covered. • The reporting period covered. <p><i>Information on emissions:</i></p> <ul style="list-style-type: none"> • Total scope 1 and 2 emissions independent of any GHG trades such as sales, purchases, transfers, or banking of allowances. • Emissions data separately for each scope. • Emissions data for all six GHGs separately (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆) in metric tonnes and in tonnes of CO₂ equivalent. • Year chosen as base year, and an emissions profile over time that is consistent with and clarifies the chosen policy for making base year emissions recalculations. • Appropriate context for any significant emissions changes that trigger base year emissions recalculation (acquisitions/divestitures, outsourcing/insourcing, changes in reporting boundaries or calculation methodologies, etc.). • Emissions data for direct CO₂ emissions from biologically sequestered carbon (e.g., CO₂ from burning biomass/biofuels), reported separately from the scopes. • Methodologies used to calculate or measure emissions, providing a reference or link to any calculation tools used. • Any specific exclusions of sources, facilities, and / or operations. 	CA	Yes	n/a	n/a	Yes
Accounting and reporting principals	GHG accounting and reporting of a scope 3 inventory shall be based on the following principles: relevance, completeness, consistency, transparency, and accuracy.	n/a	Yes	n/a	n/a	Yes
Setting the Scope 3 Boundary	Companies shall account for all scope 3 emissions and disclose and justify any exclusions.	n/a	Yes	n/a	n/a	Yes
	Companies shall account for emissions from each scope 3 category according to the minimum boundaries listed in table 5.4.	n/a	Yes	n/a	n/a	Yes
	Any GHG removals (e.g., biological GHG sequestration) shall not be included in scope 3, but may be reported separately.	n/a	Yes	n/a	n/a	Yes

Category	Requirement	Comment type	Conforms to requirement (Yes or No) at start of review	Reviewer comment/recommendation	Practitioner of the study response	Conforms to requirement (Yes or No) at end of review
	Companies shall account for scope 3 emissions of CO2, CH4, N2O, HFCs, PFCs, and SF6, if they are emitted in the value chain.	n/a	Yes	n/a	n/a	Yes
	Biogenic CO2 emissions that occur in the value chain shall not be included in the scopes, but shall be included and separately reported in the public report.	CA	Yes	n/a	n/a	Yes
Setting a GHG Target an Tracking Emissions over Time	When companies choose to track performance or set a reduction target, companies shall: - Choose a scope 3 base year and specify their reasons for choosing that particular year; - Develop a base year emissions recalculation policy that articulates the basis for any recalculations; and - Recalculate base year emissions when significant changes in the company structure or inventory methodology occur.	n/a	n/a	n/a	n/a	n/a
	To consistently track scope 3 emissions over time, companies shall recalculate base year emissions when significant changes in company structure or inventory methodology occur. In such cases, recalculating base year emissions is necessary to maintain consistency and enable meaningful comparisons of the inventory over time.	n/a	n/a	n/a	n/a	n/a
	Companies are required to recalculate base year emissions when the following changes occur and have a significant impact on the inventory: - Structural changes in the reporting organization, such as mergers, acquisitions, divestments, outsourcing, and insourcing - Changes in calculation methodologies, improvements in data accuracy, or discovery of significant errors - Changes in the categories or activities included in the scope 3 inventory In such cases, recalculating base year emissions is necessary to ensure the consistency and relevance of the reported GHG emissions data. Companies shall recalculate base year emissions for both GHG emissions increases and decreases.	n/a	n/a	n/a	n/a	n/a

Category	Requirement	Comment type	Conforms to requirement (Yes or No) at start of review	Reviewer comment/recommendation	Practitioner of the study response	Conforms to requirement (Yes or No) at end of review
	When setting a base year, companies shall develop a base year emissions recalculation policy and clearly articulate the basis and context for any recalculations.	CA	Yes	n/a	n/a	Yes
	As part of the base year emissions recalculation policy, companies shall establish and disclose the significance threshold that triggers base year emissions recalculations. Companies shall apply the recalculation policy in a consistent manner.	CA	Yes	n/a	n/a	Yes
Reporting	<p>Companies shall publicly report the following information:</p> <ul style="list-style-type: none"> - A scope 1 and scope 2 emissions report in conformance with the GHG Protocol Corporate Standard - Total scope 3 emissions reported separately by scope 3 category - For each scope 3 category, total GHG emissions reported in metric tons of CO2 equivalent, excluding biogenic CO2 emissions and independent of any GHG trades, such as purchases, sales, or transfers of offsets or allowances - A list of scope 3 categories and activities included in the inventory - A list of scope 3 categories or activities excluded from the inventory with justification of their exclusion - Once a base year has been established: the year chosen as the scope 3 base year; the rationale for choosing the base year; the base year emissions recalculation policy; scope 3 emissions by category in the base year, consistent with the base year emissions recalculation policy; and appropriate context for any significant emissions changes that triggered base year emissions recalculations - For each scope 3 category, any biogenic CO2 emissions reported separately - For each scope 3 category, a description of the types and sources of data, including activity data, emission factors and global warming potential (GWP) values, used to calculate emissions, and a description of the data quality of reported emissions data - For each scope 3 category, a description of the methodologies, allocation methods, and assumptions used to calculate scope 3 emissions - For each scope 3 category, the percentage of emissions calculated using data obtained from suppliers or other value chain partners 	CA	Yes	n/a	n/a	Yes

Comment type: AI - additional information, CA - corrective action, CR - clarification request, OB – observation

Table 3 – issues log relating to general review comments

Document reference	Document reference 2	Comment type	Priority	Reviewer comment/recommendation	Practitioner of the study response	Reviewer response
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	Slides 5 and 8	CA	High	Results for scope 1+2 in slides 5 and 8 don't appear to match.	Corrected. Previously included FERA as well as sc1&2.	Comment closed.
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	Slide 8	CA	High	Scope 3 values in the table on slide 8 do not match the GHG Inventory sheet 'Sc3 Summary 2022'. They also do not match slide 22 of the report.	Slide 8 scope 3 corrected. Now matches other slides and inventory workbook.	Comment closed.
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	Slide 24	CA	High	Results in sheet "Sc3 YOY" do not match the results presented here.	Matching current workbook.	Comment closed.
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	Slide 24	CA	High	Results in sheet "CY2022 SOGO_PG&S1 v4_report" don't match the results presented here for 2021.	I can't see any mismatches. File named shows CY2021 PGS total 136.1, as reported here.	Comment closed.
CY2022 SOGO_Capital_goods_vehicles v4	Source 1	CA	High	Is there a better source for cars masses than https://www.lovetoknow.com/life/lifestyle/list-car-weights ? E.g. vehicle specs. Not relevant for vans as EF based on number of units.	Weight seems to be a rarely reported statistic. I found another source which gives ranges more or less in line with the values used. Medium cars, the main Sogo group, match the second source quite well. https://mycarimport.co.uk/kb/what-are-the-weights-of-cars-in-the-united-kingdom/	Comment closed.
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	Slide 4	CA	Medium	It would be good to include information about SOGO at the start of the report e.g. what they do.	Done.	Comment closed.
SOGO_2022_GHG_inventory_report_V2_for_verification.pptx	General	OB	Medium	The report seems a little unfinished e.g. footer title placeholder, highlighted text, empty slides from slide 33 onwards, no conclusions or recommendations. Can it be tidied up before completion.	Done.	Comment closed.

Document reference	Document reference 2	Comment type	Priority	Reviewer comment/recommendation	Practitioner of the study response	Reviewer response
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	Slide 8	CA	Medium	If there is no renewable electricity purchases, is there any value in reporting the market-based results?	I think it is a requirement to report both but agree that it doesn't add much.	Comment closed.
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	General	OB	Medium	Can intensity metrics be added to allow for an alternative comparison between years?	Good idea! Added intensities to slide 23 for capital goods, downstream leased assets, UoSP and EOL. These all draw on different vehicle populations (bought, leased, sold) which may also overlap, so I don't think an overall intensity is helpful.	Comment closed.
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	Slide 6	CA	Medium	Add units for table.	Done.	Comment closed.
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	Slide 10	CA	Low	Can it be made clear which standards the study is claiming conformity to. It can be inferred this is the GHG Protocol Corporate and Scope 3 standard, but should be made clearer.	Detail added.	Comment closed.
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	Slide 29 and 30	CA	Low	The figures here is quite difficult to read with the number of colours, some being coloured white. Is there a way to simplify?	Removed zero bars, coloured white bars.	Comment closed.
SOGO_2022_GH G_inventory_repor t_V2_for_verif.ppt x	General	OB	Low	Table and figure numbers and captions would help readers who are skimming through and what to know what the figures are representing.	Expanded ToC.	Comment closed.

Comment type: AI - additional information, CA - corrective action, CR - clarification request, OB – observation