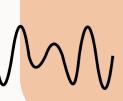


ScotchPartners

Building Services | Energy | Sustainability | Acoustics



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A Message From Our Partners

We're pleased to present Scotch Partners' second annual sustainability report. Since our inception in 2012, we've helped clients enhance their sustainability performance, and we remain committed to holding ourselves to the same high standards. Building on the foundation set in last year's inaugural report, we're proud to share our progress and continued efforts to embed sustainability at the core of our business.

Scotch Partners is a London-based design consultancy offering expertise in building services, energy, sustainability and acoustics. We combine these disciplines to offer an integrated consultancy and continue to offer separate services as clients require. We believe that sustainable and efficient design engineering delivers the highest quality buildings and internal environments: this philosophy is integral to our service offering and applied to every project we support.

It is important to us that our own practices reflect the principles we promote. Over the past year, we've taken steps to formalise and strengthen our sustainability strategy, expanding on the informal practices we previously relied on. We've made tangible progress towards our environment, social and governance (ESG) goals and refined our data collection processes to track performance and more accurately monitor our impact. Each successive report will continue to monitor and reflect on our journey, holding us accountable as we move forward.









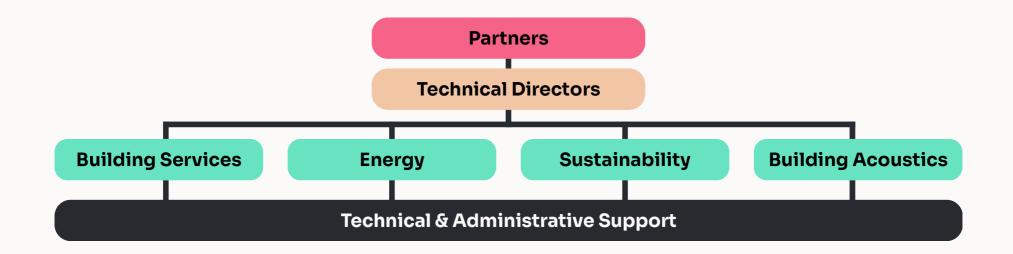








Scotch Partners: At A Glance



Services

Mechanical, Electrical & Public Health Design Engineering

Net Zero Carbon

Sustainability

ESG

Energy & Building Physics

Acoustics

Key Sectors

Science & Research

Offices & Workplace

Residential & Co-Living

Education

Retails & Hospitality

Data Centres

Manufacturing & Industrial

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Materiality Assessment to Identify Our Sustainability Priorities

Prior to our first annual sustainability report (2022-23), we conducted a formal materiality assessment to identify and prioritise the ESG topics most relevant to our business and stakeholders.

This analysis has informed our data collection priorities, reporting focus and strategic sustainability initiatives.

Key Material Topics Identified Process Sustainable Design **Environmental** Greenhouse Gas Emissions Benchmarked peer organisations in the UK built Resource Efficiency environment and consultancy sectors Diversity & Inclusion Identified sustainability topics from frameworks Social Community Engagement such as EcoVadis and the UN SDGs. **Employee Wellbeing** Engaged internal stakeholders across our teams **Data Protection** to assess impact and relevance Governance **ESG** Performance Tracking **Ethical Business Practices**

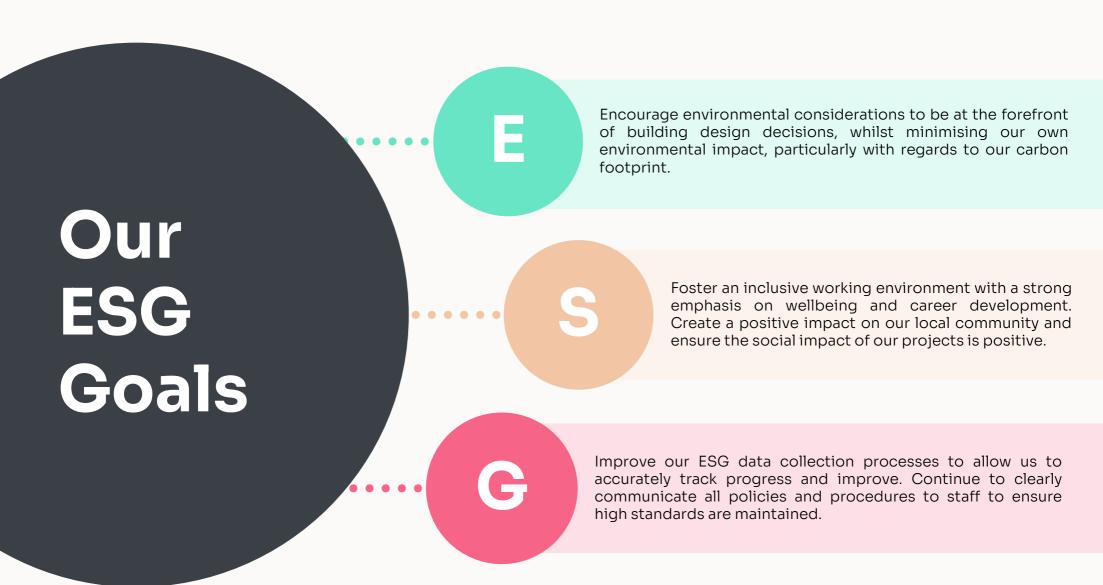






Our overarching **Environment**, **Social** and **Governance** goals are set out below.

Detailed performance, commitments and targets are discussed throughout this report.

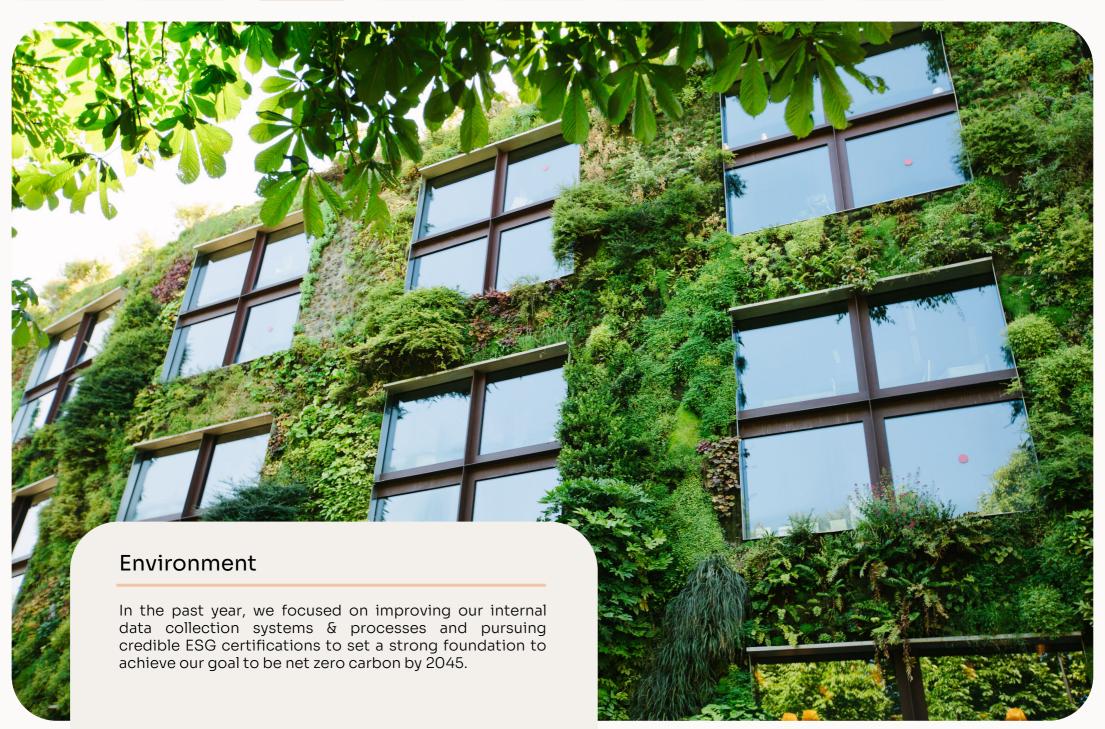


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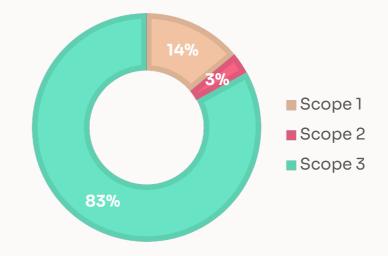




Greenhouse Gas Emissions

Between June 2023 - May 2024, our total greenhouse gas emissions were 57.18 tCO₂e. We've calculated this in line with the GHG Protocol's methodology and using conversion factors from the UK Government GHG Conversion Factors for Company Reporting.

Scope	2022-23 tCO $_2$ e (base year)	2023-24 tCO ₂ e	Change in Emissions
Scope 1	9.48	7.83	-17.4%
Scope 2	1.62	1.93	+19.1%
Scope 3	41.52	47.42	+14.2%
Total	52.62	57.18	+8.7%
Emissions Per Employee	1.14	1.12	-1.8%



As a small company with mostly desk-based activities, our overall greenhouse gas emissions are relatively low in comparison to other organisations operating in the UK construction sector.

In line with the SBTi's draft Buildings Sector Science-based Target-setting Guidance, we do not include the whole life carbon emissions of our projects within our emissions scope as this is not something we have operational control over. Our single largest source of emissions is employee commuting. A full breakdown is included on the next page.

We are constantly striving to improve our data collection processes and data quality. To better reflect our emissions as a primarily deskbased company, this year our total emissions also includes emissions associated with storing our data online.







Greenhouse Gas Emissions: Breakdown

Fraissiana Carres	2022-23		2023-24		
Emissions Source	tCO₂e	%	tCO₂e	%	Change in Emissions
Scope 1					
Natural Gas	0.13	<1%	0.15	<1%	15.4%
Refrigerants	9.35	18%	7.67	13%	-18%
Scope 2					
Electricity	1.62	3%	1.93	3%	+19.1%
Scope 3*					
3.1 Purchased Goods and Services	3.45	7%	3.23	6%	-6.4%
3.2 Capital Goods	1.78	3%	3.28	6%	+84.3%
3.3 Well-to-Tank	4.91	9%	5.86	10%	+19.3%
3.5 Waste	0.16	<1%	0.18	<1%	+12.5%
3.6 Business Travel	5.54	11%	9.47	17%	+70.9%
3.7 Employee Commuting	25.70	49%	25.40	44%	-1.2%
Total	52.62		57.18		+8.7%

^{*} Scope 3 Categories 8-15 are not applicable to Scotch's operations and Category 4 was excluded. See <u>appendix</u> for more information.







Initiatives

We are firmly dedicated to reducing and minimising the impact of our, and our clients', activities on the environment.

To steer our environmental action, we have an existing environmental policy in place and have recently created a carbon reduction plan. These set out the measures and commitments that we are taking to hold ourselves accountable and actively track our impact.

Some current initiatives we undertake to reduce our, and our clients', impacts include:

Engaging with our landlord to improve the quality of energy, refrigerant, waste and water data, including requesting submetering of our office space.

Reusing, refurbishing or repairing our equipment (e.g. laptops and mobile phones).

Engaging our clients and design teams to make more sustainable material choices for their buildings.

Aiming for the highest sustainability certification scores for our projects (e.g., BREEAM, WELL).

Calculate and reduce the embodied carbon impact of all building projects we're appointed on.

Encourage the installation of renewable energy technologies on our projects, where feasible.

Aim to reduce operational energy consumption on all projects.

Encourage our clients to make sustainable design choices for their buildings.

Reducing our greenhouse gas emissions is one of our top priorities. However, we recognise that a large portion of our emissions are out of our control. For example, the vast majority of our employee commuting emissions originate from public transport and working from home. Although we offer a cycle-to-work scheme and hybrid working, we are ultimately dependent on emissions reductions in public transport and the UK's housing stock to make a significant impact on our greenhouse gas emissions.

Achieving net zero remains our long-term goal. In the meantime, we intend to invest in highly verified carbon offsets aligned to the UN's Sustainable Development Goals, alongside continual emissions reductions, to become carbon neutral whilst Scotch Partners expands.

Key Statistics Introduction Our Approach **Environment** Social Governance Case Studies Appendix







Commitments



Annual Emissions

Calculate our annual carbon footprint across all Scope 1, 2 and 3 sources and publish this within our Annual Sustainability Report.



Net Zero by 2045

Achieve net zero greenhouse has emissions across Scope 1, 2 and 3 by 2045.

Become carbon neutral by 2028.



ESG Certification

Pursue certification from ESG platforms such as EcoVadis and B Corp.



Employee Training

Provide training to employees to reduce environmental impacts in operations and enlist their support in improving performance.











Progress in the Past Year

Established data collection systems to better improve our processes and data quality.

We've lowered our per person carbon footprint by 1.8% in the last year and strive to improve this annually.

We've committed to conducting annual carbon footprint calculations to set the foundation to reach these mid- and long-term goals.

We've begun preparing our EcoVadis submission and will formally be assessed in FY24/25.

We will explore B Corp certification further down the line.

Appointed a dedicated internal employee to oversee Scotch's ESG performance and assist in training employees.

Our Approach Social **Key Statistics Case Studies** Introduction Environment Governance Appendix















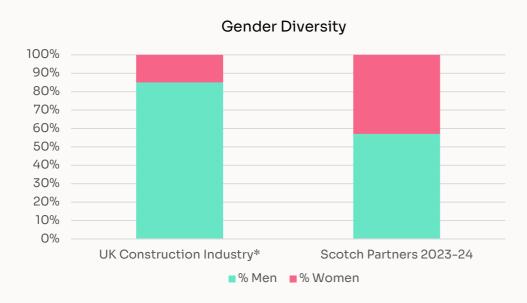
Our Employees

Our workforce is our most valuable asset. Being able to provide high quality services to our clients depends on fostering a work environment where our people can thrive. We do this by providing a range of initiatives to support their personal and professional development.

Diversity & Inclusion

We recognise that everyone has a contribution to make to our society and a right to equal opportunity. We strive to create an environment in which individual differences and the contributions of all our staff are respected and valued. To support this, we have diversity and inclusion policies that apply to all our staff: our Equal Opportunity Policy covers recruitment and promotions, and our Respect in the Workplace Policy covers workplace treatment. The UK construction industry typically has a larger proportion of male employees: this is reflected in our own gender diversity, which we aim to improve over time.

In the past year, the proportion of women in our organisation has grown from 30% to 43%



^{*}Based on statistics from the Chartered Institute of Building. This statistic includes people employed on-site.

Wellbeing

The wellbeing of our people matters because a thriving team is the foundation of a strong, sustainable organisation. We are improving our mental health strategy and policy to increase support for our employee's psychological wellbeing. Currently we have three Mental Health First Aiders that are available for emotional support and advice to anyone at Scotch.

If employees require further mental health support, they can access our Employee Assistance Programme. Scotch subscribes to this programme via BUPA to provide employees with a confidential and easily accessible channel to professional support.

By allowing hybrid working and flexible working hours around start and finish times, we strive to assist employees with parental or care responsibilities and encourage a good worklife balance.

Health & Safety

Everyone deserves to work in an environment where they feel protected and supported. Our Health and Safety Policy is regularly reviewed at monthly internal meetings, where staff also have the opportunity to raise health and safety matters at any time. An Office Risk Assessment is also reviewed annually to identify any hazards and mitigation measures. Scotch has a Contractors Health and Safety (CHAS) accreditation and had 0 work-related accidents in the 2023-24 financial year.

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Our Employees

Culture & Development

We are committed to investing in our people. We prioritise supporting talent and professional development, recognising that career progression and growth is important to our employees. Currently, we organise formal Continuing Professional Development (CPD) and informal 'Lunch and Learn' sessions that are open to all employees. We are working on expanding opportunities for our workforce to enhance their skills and advance their careers.

On top of this, we believe that a vibrant social atmosphere is key to fostering a positive work culture. We hold regular social events, such as bi-monthly 'Beer and Pizza' nights, to give company updates in an informal setting. We also present monthly 'Scotch Star Awards' which gives the chance for employees to nominate and show their appreciation for a fellow colleague. Additionally, we have a buddy programme to integrate new employees into the team, and we have a dog-friendly office.



Employee Benefits

Bi-Annual **Discretionary Bonus**

There are two discretionary bonus periods in each financial year to reward excellent work.

28 Davs **Annual Leave** All employees have 28 days of annual leave, three of which should be taken between Christmas and New Year when the business closes.

Private Medical Insurance

Employees can choose to join our BUPA private medical insurance programme.

Pension

Employees can choose to make voluntary pension contributions: Scotch will match the employee's contribution up to 6%.

Cycle-to-Work Scheme

Scotch offer financial support to employees who are purchasing bicycles to encourage active commuting and lower emissions.

Enhanced Maternity and **Paternity Pay** Scotch operates an enhanced company maternity and paternity pay scheme under our Family Friendly Policy. This also applies to same sex parents.







Our Employees: Spotlight on Continued Learning

We understand the value of continued learning in building skills and confidence at every stage of a career, which is why we actively encourage our team to pursue professional development and aim to support them however we can.

Lawrence Bramall, one of our Building Services Consultants, is currently studying part-time for an MSc in Smart Buildings and Digital Engineering at UCL. The course focuses on the integration of digital tools and performance analysis to optimise building services design - an area that closely complements his role at Scotch.



What motivated you to pursue a part-time master's degree, and how has it supported your professional development?

I was motivated to take on this master's because I wanted to learn how we can build better, particularly in terms of energy modelling, smart controls, and sustainable retrofit strategies. The part-time structure has allowed me to continue working while applying new concepts directly to live projects, which has been incredibly valuable. It's helped me view problems more holistically and contributed to a more evidence-led approach in my day-to-day consultancy work.

In what ways has Scotch's backing enabled you to get the most out of your academic journey?

Scotch's support, both in terms of flexibility and encouragement, has made a real difference. Having the space to attend lectures, work on assignments, and engage with peers has enabled me to get much more out of the experience than I could have done otherwise. There's also been a real sense that the company values the upskilling and personal growth that comes from this kind of academic engagement.

What has been the most rewarding aspect of balancing your studies with your role at Scotch?

Juggling work, study, and family life has definitely been a challenge, but there's been a real satisfaction in keeping the plates spinning. I've found that managing deadlines and shifting priorities has sharpened my focus and resilience. It's also helped me be more intentional with my time.

Do you have a go-to way to unwind after a long day of work and classes?

After hours (if I'm allowed out!), I'm on the tennis court. A lot of what I do is sedentary, and, as we're always reminded, movement is essential. So, I do my best to fight the urge to slump on the sofa and get some fresh air instead.







Community

Community Engagement

Making a positive impact has always been at the heart of our work. Beyond our client work that aims to create sustainable, high quality built environments, we understand that it is also our responsibility to contribute to the wider community. We are dedicated to supporting local initiatives through volunteering and donations by encouraging our employees to actively participate in community projects. These efforts not only contribute to the community but also strengthen relationships within Scotch. Moving forward, we are committed to strengthening our community engagement efforts by increasing our volunteering days.



The Great Scotch Bake Off

Our yearly tradition of the 'Great Scotch Bake Off' invites our employees to turn into bakers, judges and professional samplers by paying a donation to participate. With a spread including carrot cakes, croissants and cinnamon buns, a total of £145 was raised and donated to a charity of the winner's choosing.



Boxing Fight Night

We supported our Anuj Mehra with £50 for his Boxing Fight Night where he raised money for Campaign Against Living Miserable (CALM), a suicide prevention charity.



Harry's Rainbow

Scotch also made donations to various fundraisers and charities, one of which is Harry's Rainbow. This Milton Keynes based charity focuses on providing support to children bereaved of a parent or siblings, and offers services such as therapeutic support groups, mentoring and trips and activities.



Movember

In November, some of our team proudly took part in Movember, a charity that focuses on raising awareness around men's health issues. They started 1st November with a clean shave, as they committed to growing moustaches throughout the month as a visible symbol of support. Funds were also raised, contributing to life-changing research and support programmes.





Employee Benefits

Review our employee benefits in collaboration with our employees.

V



Upskilling & Training

Increase number of CPD and Lunch & Learn sessions, whilst encouraging higher attendance.



Diversity & Inclusion

Create an inclusive workplace that accommodates diversity.

V

Our 23/24



Employee Engagement

Undertake annual employee engagement surveys to better understand and account for the needs of our workforce.

V



Volunteering

Increase the number of annual volunteering days and amount of charity donations.



Mental Health Awareness

Ensure all employees are fully aware of the mental health support available.



Progress in the Past Year

Employee benefits are one of the key topics reviewed during our employee engagement sessions While the number of sessions decreased, our average attendance per CPD session stayed the same.

employee
engagement
survey showed that
employees felt a
strong sense of
belonging. More
than 80% of
respondents said
they were treated
with respect by
their direct
managers, and that
their managers
care about their
wellbeing.

Held a Scotch
Partners Listening
Exercise with
employee
engagement
sessions.

To facilitate an increase in volunteering, we aim to encourage this by implementing a volunteer day.

Organised activities throughout Mental Health Awareness Week such meditation, crochet and going on a team walks, all in line with 2024's theme of 'Movement: Moving more for our mental health'.









Our Approach **Key Statistics** Introduction Environment Social Governance Case Studies Appendix







Sustainability Governance Structure

We have formalised our Sustainability Governance Structure to oversee Scotch's internal ESG progress. While this is largely helmed by members of our Sustainability and Business Operations teams, we engage employees throughout the business to support our ESG efforts.



















Policies and Procedures

Our commitment to transparent and ethical business practices is reflected in our comprehensive suite of business policies and procedures.

Anti Bribery

Our anti-bribery policy provides a framework for all staff to be aware of bribery, facilitation payments and gifts, among other forms of bribery. It also enables employees to identify and report policy breaches.

Quality Control

It is the responsibility of everyone at Scotch to ensure the highest levels of quality in our services. To enable this, we ensure that our employees have regular training, and both formal and informal performance reviews.

Conflict of Interest

Our Conflict of Interest policy provides guidance on recognising, declaring and managing conflicts of interest that may arise.

Grievance

We are committed to handling workplace grievances fairly and transparently. We have set out a procedure for employees to raise and manage any issues both formally and informally.

Data Protection

Our data management is informed by our Data Protection Policy and Employee Data Protection Privacy Notice. These ensure that our clients', employees' and suppliers' data is protected.

Whistleblowing

Our whistleblower procedure encourages openness and ensures support for anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

Fraud and Money Laundering

We have zero tolerance for any fraudulent activities or attempts to launder money through our business.

IT and Security

Our IT and Security Policy ensures that we take the necessary precautions to safeguard our internal data and the information our clients trust us with

Equal Opportunities

We want all our employees to have the best possible start with us and to be set up for success while working at Scotch. We aim to eliminate harassment and discrimination throughout all our processes and are committed to creating an environment where everyone can diversify, grow and progress.







Engineers Declare

We're a signatory of *Engineers Declare* to ensure sustainability is at the heart of our operations and projects. This member-led declaration acknowledges the major role that buildings and construction play in the climate crisis, contributing to nearly 40% of energy-related carbon dioxide emissions. Through this, we pledge to enhance our practices to create building services engineering outcomes that achieve more positive impacts on the environment.

On top of the direct sustainability services that we offer, we ensure that sustainability principles are incorporated into all work streams across mechanical, electrical, public health engineering and acoustics.

For instance, our MEP team plays a key role in delivering sustainable building outcomes by embedding environmental considerations from the earliest design stages. Our approach is rooted in selecting efficient systems, using low-impact materials, and designing with long-term operational performance in mind.

Where appropriate, we specify a set of typical products and systems known to offer strong environmental performance, including high-efficiency air source heat pumps, lowtemperature heating systems, LED lighting with smart controls, and demand-driven ventilation systems. These systems are chosen not only for their technical performance, but also for their durability, maintainability, and alignment with circular economy principles.

We work closely with architects and structural engineers to ensure MEP systems are integrated in a way that reduces material waste, enables adaptability, and enhances occupant wellbeing. This collaborative, fabric-first mindset ensures that sustainability is embedded in the DNA of every design decision.









Commitments



ESG Champion

Appoint a dedicated internal employee to oversee Scotch's ESG performance and commitments.



ESG Data Tracking

Formal systems have been put in place to accurately collect ESG data. This includes tracking business travel and purchased goods, for example.



Policies & Ethics

All policies are reviewed annually. These are updated where applicable.



Working Group

Establish a 'Net Zero Carbon Buildings' working group ahead of the UKNZCBS release.





















Progress in the Past Year

A dedicated internal employee was appointed in the past year, and more employees have been getting involved in supporting on Scotch's internal ESG performance.

We have been improving our data collection systems and accuracy over the past year.

On top of reviewing our policies annually, we have added 4 new policies that help address other areas of our business, such as conflict of interest, and fraud and money laundering.

As the pilot version of the standard was only released in FY24/25, our focus in FY23/24 was on staying informed and preparing to engage more formally in the following year.







Key Statistics

This table summarises the key statistics from this report. It will be updated annually to show progress against previous years.

Metric	2022-23	2023-24	% Change
Number of Employees	46	51	+10.9%
Total Greenhouse Gas Emissions	52.62 tCO₂e	57.18 tCO₂e	+8.7%
Greenhouse Gas Emissions Per Employee	1.14 tCO₂e	1.12 tCO₂e	-1.8%
Number of Work-Related Accidents	0	0	0
Number of Mental Health First Aiders	3	3	0
% Women Employees	30%	43%	+43.3%
CPD and 'Lunch & Learn' Sessions	27	17	-37%
Average Attendance Per CPD Session	7.5	7.6	+1.3%

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Our ESG Services

We provide a range of services that support the design and delivery of highly sustainable buildings. In addition, we offer consultancy services to help our clients improve the overall ESG performance of their organisation.

Services include:

- ESG and NZC Strategy Development & Implementation
- Sustainability and Low Carbon Consultancy
- Building Physics Modelling & Consultancy
- Embodied and Whole Life Carbon Assessments
- Circular Economy Assessments
- Operational Energy Assessments
- BREEAM
- · WELL and Fitwel







Wellbeing at the Core

Set in Covent Garden, Grainhouse has been reimagined to create a vibrant new development that blends contemporary workspace and retail with a deep commitment to sustainability and wellbeing. The refurbishment and extension of the site has delivered around 120,000 square feet of flexible office space alongside ground and basement-level retail units.

Scotch Partners were appointed to provide a suite of environmental and building services support across the development. Working closely with the wider design and delivery team, we led on BREEAM and WELL certification strategies, building services design, energy modelling, acoustic consultancy, and client-side monitoring to ensure sustainability targets were embedded at every stage.

The scheme is targeting BREEAM 'Excellent' and WELL 'Platinum' certifications—an uplift from the original WELL 'Gold' ambition. This reflects the client's drive to create not only a sustainable building but a healthy one, with wellbeing features including advanced air filtration systems, intelligent thermal comfort controls, biophilic design principles and the use of natural materials. Ongoing building management policies will also support active travel, mental health, sleep and family wellbeing.

The scheme has also been selected by Hines to be the location for their new European Headquarters. Scotch Partners were appointed to support the Cat B fit-out of their office space, which is targeting BREEAM 'Outstanding' and WELL 'Platinum' ratings, demonstrating the same high-performance environmental and health aspirations at an occupier level.









A Sustainable Transformation

By creatively reusing existing buildings at Shepreth Research Building 1, what began as light industrial units has been transformed into a sustainable research hub that delivers high-quality workspaces, promotes sustainability, and supports wellbeing and biodiversity, all while maximising return on investment.

Scotch Partners were brought on board to provide an embodied carbon assessment and BREEAM support, with the baseline planning requirement set at BREEAM Excellent. However, the team was encouraged to maximise sustainability elements further, embedding additional sustainability measures to target BREEAM Outstanding. Scotch helped navigate the challenges of retrofitting an older building, ensuring we could still maximise sustainability outcomes within the constraints of the existing structure.

A major success of the project was in maximising the energy performance of the building, ecology and drainage credits through the BREEAM assessment. The building secured all fifteen available BREEAM Ene O1 credits, and ecological outcomes were also prioritised, with a contractor-led Biodiversity Action Plan during works on site and a Landscape and Habitat Plan to be developed in accordance with BS42020:2013 at project completion. In addition, sustainable water management was integrated into the design, ensuring that peak site runoff would be lower than pre-development levels, thereby strengthening resilience while also achieving maximum drainage credits.









Appendix - Scope 3 Screening

This screening of Scope 3 categories has been conducted in line with the GHG Protocol's Corporate Reporting and Accounting Standard by a group of cross-functional internal team members at Scotch. We have set a materiality threshold whereby a category that is expected to contribute to less than 5% of overall emissions can be excluded if sufficient data is not available. However, if sufficient data is available, then even minor sources of emissions should be presented here.

Category	Relevant?	Justification of Relevance	Data Quality	Planned Action
1. Purchased Goods and Services	Yes	Includes water consumption, our weekly order for office snacks, data storage, general office stationery and general adhoc items.	Excellent	Continue ensuring all data is recorded throughout the year and engage with suppliers to obtain product-specific emissions factors.
2. Capital Goods	Yes	Includes mobile phones, laptops and other electronic equipment.	Excellent	Continue ensuring all data is recorded throughout the year and engage with suppliers to obtain product-specific emissions factors.
3. Fuel- and Energy-Related Activities	Yes	Well-to-tank emissions associated with the production of fuels and energy purchased and consumed by us (i.e., natural gas, electricity, business travel and commuting).	Good	Liaise with our new landlord to improve the quality of our Scope 1 and 2 data. Make improvements to categories 6 and 7 as discussed below.
4. Upstream Transportation and Distribution	Yes	Emissions associated with to the transportation of our office snacks, general office stationery and other ad-hoc items to our offices.	Poor	Data was not available to calculate this category as we only purchase goods from Amazon and Ocado, who do not provide this data, as well as occasional ad-hoc items from small retailers. However, this is expected to contribute to less than 1% of our overall emissions so this has been excluded rather than estimated. We will continue to engage with Amazon and Ocado to attempt to gather this data.
5. Waste	Yes	The disposal of waste generated in our offices, including wastewater.	OK	Liaise with our new landlord to improve data quality.
6. Business Travel	Yes	All travel for business purposes (i.e., grey fleet, hire vehicles, taxis, trains, flights and hotels).	Good	Ensure all data is captured in the future via our expenses system. Educate staff to all required data is entered.

To be continued on the following page.







Appendix - Scope 3 Screening (Continued)

Category	Relevant?	Justification of Relevance	Data Quality	Planned Action
7. Employee Commuting	Yes	Emissions from private and public transport used by employees to commute to the office. Also includes emissions associated with employees working from home. This was based on an employee commuting survey.	Good	Increase engagement with the employee commuting survey.
8. Upstream Leased Assets	No	No upstream leased assets (other than our offices, which are included in scopes 1 and 2).	-	-
9. Downstream Transportation and Distribution	No	We provide building design and consultancy services. We do not offer a physical product.	-	-
10. Processing of Sold Products	No	As above.	-	-
11. Use of Sold Products	No	As above.	-	-
12. End-of-Life Treatment of Sold Products	No	As above.	-	-
13. Downstream Leased Assets	No	No downstream leased assets.	-	-
14. Franchises	No	No franchises.	-	-
15. Investments	No	No investments	-	-

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ScotchPartners