



Carbon Footprint Expert Review Report
for
Go Cardless Ltd

1st January 2024 - 31st December 2024

Expert Review summary

Consultant:	Sarah Thornton, BSc (Hons) Environmental Consultant
Report reviewed by:	Joe Murray, BSc (Hons), MSc Environmental Consultant
Authorised by:	Dr. Wendy Buckley Client Director / Co-Founder
Inventory period reviewed:	1 st January 2024 to 31 st December 2024
Level of assurance:	Limited
Assurance being given to:	Jamie Nimmo, Go Cardless Ltd
Verification Standard Followed:	ISO 14064-3: 2019
Methodology used for the calculation:	GHG Protocol Corporate Value Chain Accounting and Reporting Standard

Expert Review Statement

Go Cardless Ltd

30 April 2026

Scope

Go Cardless Ltd engaged Carbon Footprint Ltd to conduct a verification following the ISO14064-3:2019 at a limited assurance level. As Carbon Footprint Ltd has provided the Sustrax software, this is not a third-party verification but strict independence criteria have been used, see Section 1.6. The Expert Review covered auditing the carbon footprint assessment and supporting evidence for the period 1st January 2024 to 31st December 2024. Go Cardless Ltd is responsible for the activity data input into the Sustrax software. The responsibility of Carbon Footprint Ltd is to provide a conclusion as to whether the statements made are in accordance with the GHG Protocol. Carbon Footprint Ltd calculated the emissions internally for the following categories:

- Scope 2: Electricity (excluding London and Riga)
- Category 3.5: Waste (excluding London)
- Category 3.6: Rail, flights and hotel data from the travel report
- Category 3.7: Commuting and homeworking
- Category 3.11: Use of sold products; website visits, online and direct debit payments, and customer dashboard
- Category 15: Investments; pensions, corporate banking, and money moved

Methodology

The Expert Review was led by Sarah Thornton, BSc (Hons), Environmental Consultant. Go Cardless Ltd used the Sustrax MX software to calculate its footprint. Carbon Footprint Ltd completed the review in accordance with the '[ISO 14064 Part 3 \(2019\): Greenhouse Gases: Specification with guidance for the verification and validation of greenhouse gas statements](#)'. The work provides a limited level of assurance with respect to the GHG statements made. Carbon Footprint Ltd believes that the review of the assessment and associated evidence, coupled with this subsequent report, provides a reasonable and fair basis for our conclusion. The following data was within the scope of the Expert Review (below shows the post-audit results):

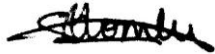
Scope	Emission Source	Location-Based (tCO ₂ e)	Market-Based (tCO ₂ e)
1	Fugitive emissions (incl. Refrigerant gases and AC)	<0.01	<0.01
Scope 1 Total		<0.01	<0.01
2	Consumption of purchased electricity, heat steam and cooling	82.59	212.42
Scope 2 Total		82.59	212.42
3	3.1 Purchased goods and services	4,847.55	4,847.55
	3.2 Capital goods	66.53	66.53
	3.3 Fuel and energy related activities (not included in scope 1 or scope 2)	28.19	28.19
	3.5 Waste generated in operation	4.45	4.45
	3.6 Business travel (not included in scope 1 or scope 2)	1,634.22	1,634.22
	3.7 Employee commuting	438.62	438.62
	3.11 Use of sold products	143.87	143.87
	3.15 Investment	12,963.32	12,963.32
Scope 3 Total		20,126.75	20,126.75
Total (Scope 1, 2 and 3)		20,209.35	20,339.17

Assurance opinion

Based on the results of our Expert Review process, Carbon Footprint Ltd provides limited assurance of the GHG emissions statement, **and found no evidence that the GHG emissions statement:**

- is not materially correct and is not a fair representation of the GHG emissions data and information;
- has not been prepared in accordance with the GHG Protocol.

It is our opinion that Go Cardless Ltd has established appropriate systems for the collection of quantitative data for determination of GHG emissions, assessed using the Sustrax carbon reporting platform and for the stated period and boundaries.

A handwritten signature in black ink, appearing to read "S Thornton".

Sarah Thornton, BSc (Hons)
Environmental Consultant
Carbon Footprint Ltd

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1 Introduction

Go Cardless Ltd is an online direct debit services provider, based at a headquarters in London, UK. During 2024 the business operated from five offices located across the UK, USA, France, Australia and Latvia. The USA office closed during August of the assessment period.

This report provides the outcomes of the Expert Review of Go Cardless Ltd.'s United Kingdom, France, United States, Australia, Latvia, and Germany Greenhouse Gas (GHG) statement for the period 1st January 2024 to 31st December 2024. The scope of the assessment is defined in Section 2.

The Expert Review was based on an assessment of Go Cardless Ltd.'s 2024 carbon footprint, calculated using the carbon reporting platform Sustrax.

Sustrax MX is a cloud-based carbon calculation platform, aligned with the Greenhouse Gas Protocol. The calculations primarily use GHG conversion factors from the Department for Environment, Food & Rural Affairs (Defra), along with country-specific electricity factors where necessary.

This has been supplemented with a review of supporting evidence. An Expert Review plan (Appendix 1) was devised at the preliminary stages of the assessment to guide the Expert Review process. The sampling plan in Appendix 2 lists the documents requested for Expert Review.

The Expert Review was completed in line with the International Standard ['ISO 14064 Part 3 \(2019\): Greenhouse Gases: Specification with guidance for the verification and validation of greenhouse gas statements'](#) to a limited assurance level.

1.1 Objectives

The objectives are:

- To provide assurance to Go Cardless Ltd, to ISO 14064-3 standard, that the GHG statement is reliable and of sufficient quality.
- To assist internal purposes – mainly for CSR reporting and other disclosures; annual reports and tracking towards internal targets.

1.2 Expert Review Scope

The GHG statement that is being verified is Go Cardless Ltd's United Kingdom, France, USA, Australia, Latvia, and Germany carbon footprint for the 1st January 2024 to 31st December 2024.

The GHG emissions have been consolidated through the operational control approach and are reported in terms of carbon dioxide equivalent (CO₂e).

1.3 Materiality

A qualitative and quantitative evaluation of any errors, limitations or misrepresentations has been undertaken. The team, using professional judgment, determined whether any qualitative discrepancies could affect the overall GHG statement and, in turn, have a material impact on the decisions of the intended user.

Quantitative discrepancies were calculated individually to understand the impact of them as a percentage of the GHG statement. The pre-defined materiality threshold is 5% of the total inventory.

1.4 Responsibility

Go Cardless Ltd is responsible for the data input into Sustrax, and any supporting information. Carbon Footprint Ltd provides an Expert Review of the results, to a limited level of assurance. Appendix 3 provides a profile of the Expert Review team.

1.5 The work undertaken

The Expert Review was conducted following the ISO 14064-3 (2019): Greenhouse gases- part 3: *'Greenhouse Gases: Specification with guidance for the verification and validation of greenhouse gas statements'*. An Expert Review plan (including sampling) was devised at the preliminary stages of the assessment to guide the Expert Review process (see appendices).

In conformance with the ISO 14064-3 standard (as a non-third-party verification), the following activities were undertaken:

- Initial review of the GHG documentation and methodologies, including historical GHG data for the period 1st January 2024 to 31st January 2024.
- Remote audit, involving discussions with staff from Go Cardless Ltd regarding:
 - Scope of calculation (including assessment boundary).
 - Input data sets, any missing data, estimations made and assumptions.
 - Quality control procedures.
 - Results & interpretation.

1.6 Independence

This Expert Review was performed by Carbon Footprint Ltd as a second-party verifier providing a limited level of assurance under ISO 14064-3:2019. Carbon Footprint Ltd also supplies the carbon calculator used for this assessment. To maintain impartiality, the software development team and the verification team operated independently, with clear separation of responsibilities and oversight to ensure an unbiased expert review.

The consultant is independent from development of the Sustrax platform. The consultant has maintained objectivity during the audit, basing conclusions on evidence obtained during the audit.

1.7 Abbreviations

CSR	Corporate Social Responsibility
Defra	Department for Environment, Food & Rural Affairs
GHG	Greenhouse Gas
ISO	International Organisation for Standardisation
kWh	Kilowatt Hours
SIC	Standard Industrial Classification
tCO ₂ e	Tonnes of Carbon Dioxide Equivalent
USA	United States of America

2 Expert Review results

2.1 Assessment of the GHG calculation and its controls

2.1.1 Boundary and data selection

Organisational boundary

The GHG emissions have been consolidated through the operational control approach and are reported in terms of carbon dioxide equivalent (CO₂e), for the global operations. The following sites are within the scope of the assessment:

- London, United Kingdom
- Paris, France
- New York, USA
- Victoria, Australia
- Riga, Latvia

No sites were excluded from the assessment. During 2023, the Germany office closed and so this site was no longer relevant for the 2024 assessment period. During 2024, the New York site closed in August.

Table 1: Results of Go Cardless Ltd.'s carbon footprint assessment by GHG Protocol emission categories

Scope	Emission Source	Location-Based (tCO ₂ e)	Market-Based (tCO ₂ e)
1	Fugitive emissions (incl. Refrigerant gases and AC)	<0.01	<0.01
Scope 1 Total		<0.01	<0.01
2	Consumption of purchased electricity, heat steam and cooling	82.59	212.42
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Total (Scope 1, 2 and 3)		20,209.35	20,339.17



Reporting boundary

The operational boundary was reviewed and has been determined that all material emissions sources have been captured within the assessment boundary. This is summarised in Table 2 below.

Table 2: Go Cardless Ltd.'s GHG Assessment boundary based on the Greenhouse Gas Protocol Accounting and Reporting Corporate Standard
(All green rows have been included in this assessment; all grey rows are not applicable)

Scope	Title	Calculation Type	Completion Status	Justification
1	Electricity, heat or steam generated on-site		Not relevant	
	Fuel Use		Not relevant	
	Company owned vehicles		Not relevant	
	Fugitive emissions (incl. Refrigerant gases and AC)	Activity data	Complete	
2	Consumption of purchased electricity, heat steam and cooling	Activity data	Complete	
3	3.1 Purchased goods and services	Spend and activity data	Complete	
	3.2 Capital goods	Activity data	Complete	
	3.3 Fuel and energy related activities (not included in scope 1 or scope 2)	Activity data	Complete	
	3.4 Upstream transportation and distribution	Activity data	Complete	
	3.5 Waste generated in operation	Activity data	Complete	
	3.6 Business travel (not included in scope 1 or scope 2)	Activity data	Complete	
	3.7 Employee commuting	Activity data	Complete	
	3.8 Upstream leased assets		Not relevant	
	3.9 Downstream transportation and distribution		Not relevant	
	3.10 Processing of sold products		Not relevant	
	3.11 Use of sold products	Activity data	Complete	
	3.12 End-of-life treatment of sold products		Not relevant	
	3.13 Downstream leased assets		Not relevant	
	3.14 Franchises		Not relevant	
	3.15 Investment	Activity data	Complete	

2.2 Data Management

During this data period, GoCardless's annual GHG emissions data was uploaded to Sustrax by the Workplace Experience Manager. The data uploaded to Sustrax was checked for completion and accuracy by Carbon Footprint Ltd, and any categories where data was missing were highlighted. The following categories required internal extrapolation or calculation by Carbon Footprint Ltd:

- Scope 2: Electricity (excluding London and Riga)
- Category 3.5: Waste (excluding London)
- Category 3.6: Rail, flights and hotel data from the travel report
- Category 3.7: Commuting and homeworking
- Category 3.11: Use of sold products; website visits, online and direct debit payments, and customer dashboard
- Category 3.15: Investments; pensions, corporate banking, and money moved
-

The annual external audit carried out by Carbon Footprint is currently the only form of quality control in place for checking the data and calculations are correct.

During this assessment, data was being collected two years after the assessment period had finished, resulting in some challenges in acquiring the activity and spend data needed for all assessment categories. The following data limitations were highlighted during the audit (with data checks and accuracy comments outlined in Table 3):

- A commuting and home-working survey had not been completed at the end of 2024, and so raw data was not available.
- Data was not available for kWh consumption at offices other than London and Riga.
- Waste data was only available for the London office.
- Investments and use of sold products data could not be calculated on Sustrax, and so the calculations were completed by Carbon Footprint Ltd externally and uploaded to Sustrax on behalf of GoCardless.

Table 3: Data Source, Accuracy and Checks

Data	Source of data	Verifier comments	Accuracy	Materiality	Uncertainty	Error Margin (tCO ₂ e)
Purchased Goods and Services and Capital Goods ¹	An annual spend report was provided by GoCardless and included the total spend on all suppliers throughout 2024 for all purchased goods and services and capital goods.	Any spend data that had already been accounted for with activity data was removed from the spend calculations. Carbon Footprint Ltd completed the SIC code allocation and uploaded spend data to Sustrax on behalf of GoCardless. It was not possible to accurately split out Capital Goods from Purchased Goods and Services and so all emissions have been included under Purchased Goods and Services.	Average	High (20-40%)	50%	2,473.74
Investments	Data was provided from internal records for investments which generated interest during the assessment period, money moved and pensions.	Carbon Footprint Ltd calculated investments using the Scope 1 and 2 emissions data for each bank, apportioning these based on the average amount held in each account during the assessment period. Pension supplier information was unable to be obtained and so the Defra 2022 SIC code for pensions was used to estimate emissions from this source of GoCardless' investments.	Good	Very High (>40%)	10%	1,296.33
Commuting and home-working	Home-working and commuting data was unable to be provided and so emissions data was sourced from the 2023 report (audited by Carbon Footprint Ltd) and extrapolated based on employee numbers per site.	Carbon Footprint Ltd completed the extrapolation calculations and uploaded the data to Sustrax. This method was considered acceptable as GoCardless's hybrid working policy did not change between 2023 and 2024.	Average	Low (1-5%)	50%	219.31

¹ This figure includes spend associated with upstream transportation and distribution, and taxi and rail travel spend data.

Data	Source of data	Verifier comments	Accuracy	Materiality	Uncertainty	Error Margin (tCO ₂ e)
Electricity	<p>The total kWh of electricity used at the London office was provided for both floors by the Landlord. The data was taken from meter readings and apportioned to GoCardless where appropriate.</p> <p>Total kWh were provided for the Riga site by the Landlord.</p> <p>Data was unobtainable for all other sites.</p>	<p>Where data could not be provided, a kWh average per employee was taken from the London office and extrapolated for Paris, Melbourne and New York. The New York office was open until August 2024 and so the kWh consumption was adjusted to account for this. Carbon Footprint Ltd completed the extrapolation calculations and uploaded the data to Sustrax.</p> <p>Residual mix emissions factors were used for all sites as tariff specific information could not be provided.</p>	Average	Low (1-5%)	50%	120.30
Computing (Capital Goods)	The total number of purchased monitors and laptops for all relevant sites was provided from internal records.	Computing purchases for all relevant sites have been included.	Average	Very Low (<1%)	50%	33.27
Flights	Data was provided from an internal travel report including information on departure and destination cities and cabin class. The number of passengers was assumed to be one per record.	Carbon Footprint Ltd calculated the emissions associated with flights using an internal calculator and uploaded the data to Sustrax. DEFRA 2024 emissions factors were used.	Excellent	Medium (5-20%)	1%	15.23
Use of Sold Products	Data was provided from internal IT records and included information on the total number of website visits, total number of direct debit and open banking payments and the total number of hours spent on the customer dashboard per country.	<p>Carbon Footprint Ltd calculated the emissions associated with websites, customer payments and customer dashboard and uploaded the data to Sustrax.</p> <p><u>Website visits</u> – a website carbon calculator tool was used to estimate the emissions associated with each website visit.</p>	Very Good	Very Low (<1%)	5%	7.19

Data	Source of data	Verifier comments	Accuracy	Materiality	Uncertainty	Error Margin (tCO ₂ e)
		<p><u>Payments</u> – the same methodology as the previous assessment was used, using the number of moves in each transaction², the average size of each data packet³, and the energy required to move data⁴.</p> <p><u>Customer dashboard</u> – kWh usage per hour by country was calculated based on the total number of hours spent on the dashboard⁵.</p>				
Waste	Waste data was provided by the Landlord for the London office. This included the tonnes of waste sent to landfill, recycled and incinerated.	Waste data could not be provided for other sites and so an average per employee was taken from the London site and extrapolated based on employee number for other sites. Carbon Footprint Ltd completed the extrapolation calculations and uploaded the data to Sustrax.	Average	Very Low (<1%)	50%	2.23
Hotel Stays	Data was provided from a travel report and included information on the hotel country and number of guest nights.	Carbon Footprint Ltd extracted the data from the travel report and uploaded it to Sustrax on behalf of GoCardless.	Very Good	Very Low (<1%)	5%	0.47
Public Transport	Data was provided from spend records and an internal travel report. The travel report provided information on departure and destination locations and ticket type.	Spend public transport data was uploaded to Sustrax by GoCardless. All travel report data emissions were calculated by Carbon Footprint Ltd using an internal calculator and Defra 2024	Very Good	Very Low (<1%)	5%	0.09

² The number of moves per transaction was assumed to be the same as the previous reports, at 2.0007.

³ The average sizes of each data packet (GB) were taken from the previous assessment and verified through [MailMeteor](#).

⁴ The same methodology was used as the previous assessments, assuming the energy required for moving data is 1.8kWh/GB.

⁵ The same methodology was used as the previous assessment, assuming the 0.15kWh of electricity are used per hour based on the [Home Working Emissions Whitepaper \(2020\)](#).

Data	Source of data	Verifier comments	Accuracy	Materiality	Uncertainty	Error Margin (tCO ₂ e)
	The number of passengers was assumed to be one per record.	emissions factors and was uploaded to Sustrax. The data covered all relevant sites.				
Refrigerants	The total number of bottles of CO ₂ used for the carbonated tap in the London office was provided.	The gas used for the carbonated tap was accounted for under refrigerants.	Very Good	Very Low (<1%)	5%	<0.01
Total Emissions					+/- 20.49%	+/- 4,168.16

2.3 Calculation checks

The calculations were carried using the Sustrax MX reporting platform, which uses the emission factors developed by the Department for Environment, Food and Rural Affairs (DEFRA). Spot checks were carried out on the Sustrax MX calculations and no major errors were found. The table below discusses any calculation errors, as well as data errors that were picked up during the audit. All major errors were corrected.

Table 4: Data and calculation checks

Emission source	Issue	Comment/action
Postal and Courier	The GHG category selected was Capital Goods.	Carbon Footprint Ltd updated the GHG category to 3.4 Upstream Transport and Distribution.
Public transport (spend)	The GHG category selected was Capital Goods.	Carbon Footprint Ltd updated the GHG category to 3.6 Business Travel (not included in Scope 1 or 2).
Spend	The spend data provided initially included expenses for employees. A revised spend report only included supplier spend for supplier names A-R.	A full supplier spend report was provided from accounts for all suppliers A-Z during 2024, and excluding employee reimbursements.
Spend	The total spend on rail and taxi doubled since the last assessment, is this expected?	GoCardless confirmed that an increase in travel is expected.
Use of Sold Products	The total hours on the customer dashboard is significantly higher compared to last year and also provided for significantly more countries.	GoCardless confirmed an increase in products and clients since the previous assessment period which would support this change.
Waste	Waste data has only been provided for London, can data be provided for other sites?	Data is not available from other sites, continue to extrapolate the data based on London waste data as per previous methodology.
Commuting and home-working	Data missing from initial audit.	Data is unavailable, extrapolate based off of the 2023 assessment period and employee numbers.
Electricity	When did the Melbourne and New York offices close in 2024?	New York closed in August 2024, with five people using the workspace. The office in Melbourne did not close, but did move office location.

Emission source	Issue	Comment/action
Electricity	The electricity consumption for London looks low compared to the previous assessment. There appeared to be data provided for two floors whereas data was only provided for one floor during the initial audit for 2024.	kWh data was provided for the second floor in the London office.
Pensions (<i>Investments</i>)	Is there any data for Paris and Riga? Is it possible to provide information on the provider(s) for each pension? If there are multiple providers, a split of funders per provider will be necessary.	Additional information on funds and splits between multiple funds is unobtainable.
Corporate banking (<i>Investments</i>)	The average amount held in accounts generating interest for corporate cash is significantly lower than last year. Is this expected?	Yes, it would not be unusual to see a decline. However, looking at the numbers Carbon Footprint Ltd gave me in the screenshot above, it seems the biggest decline is in RBS. GoCardless have taken a look at my workings from previous years and GoCardless have a different number for RBS. It is likely that the client funds have been included in the number sent to the carbon people which would make the number much higher.
Business travel	The total emissions for business travel have decreased significantly. Looking at the spreadsheet provided last year, we've got data from a travel provider report up to June 2024 associated with flights, hotel and taxis adding up to 408 tCO ₂ e. Do you know what report this is, and are you able to share this for the whole data period? For the last assessment, this travel report was additional to any spend data provided for business travel.	A travel report for the full assessment period was provided and included information on flights, rail and hotels.

3 Conformance with Expert Review criteria

The chosen methodology that has been used for accounting and reporting Go Cardless Ltd.'s GHG inventory is the GHG Protocol standard. Carbon Footprint Ltd has examined Go Cardless Ltd.'s GHG statement in relation to the ISO14064-3 standard. The Expert Review activities have shown that Go Cardless Ltd has met the Expert Review criteria satisfactorily.

Relevance – the data collected and reported reflects the significant environmental impacts of Go Cardless Ltd.'s operations.

Completeness – emission sources that come within the reporting boundary have been quantified and reported where possible. Exclusions (if applicable) have been disclosed and justified.

Consistency – methodologies are documented and appear to be consistent.

Transparency – the carbon footprint report states the company's approach to data collection and the estimations that were made.

Accuracy – sufficient accuracy has been achieved. Actions to improve data accuracy and reduce uncertainty have been identified.

4 Recommendations

4.1 Carbon & sustainability targets

4.1.1 Improving the accuracy of future carbon footprint assessments

To improve the accuracy of future assessments, we recommend the following:

- Obtain electricity data for all sites, where possible activity data (kWh consumption) should be used.
- Investigate with building managers whether supplier specific information can be provided for electricity usage at all sites.
- Expand the scope of supplier-specific data used in Purchased Goods and Services/Capital Goods.
- Aim to collect activity data for all business travel. This could be done by updating the process for business travel expenses claims to include departure and destination locations.
- Aim to categorise spend based on Capital Goods or Purchased Goods and Services. This could be done by including information on what category the spend was for, e.g.; furniture, software.
- Complete an annual commuting and homeworking questionnaire for all offices.
- Provide information for pension suppliers and a split for total investment with each pension provider.

4.1.2 Target setting for net zero

Your company should set targets based on per employee and/or per £M turnover, which will account for business growth. Many organisations are now setting targets based on typical mid-term and longer terms goals to reach net zero (ISO's International Workshop Agreement on Net Zero Guidance - IWA 42:2022⁶):

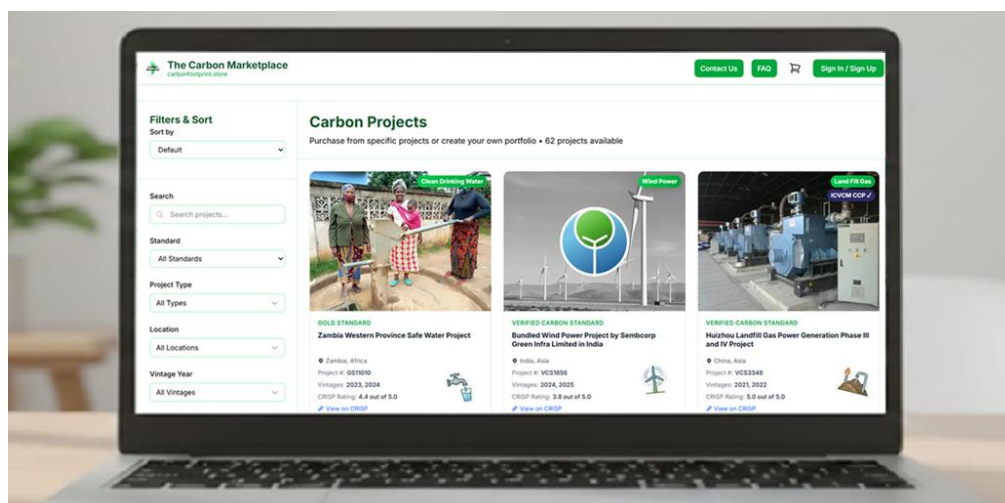
- A 50% reduction in emissions per £M turnover/employee by 2030.
- A 90% reduction in emissions per £M turnover/employee by 2045.

All targets set should be reviewed regularly and amended accordingly (i.e. target increased if it is met ahead of schedule). A clear roadmap for individual emissions sources should be in place. This will ensure the strategy for reducing CO₂e emissions and tracking toward a net zero target is appropriate for the business.

A hyperlink to Carbon Footprint Ltd.'s whitepaper on target setting can be found [here](#).

⁶ [ISO - Net Zero Guidelines](#)

4.2 Taking Responsibility for your Emissions



Carbon reduction and removal projects provide a practical solution for compensating for emissions that cannot be reduced by supporting projects that achieve an equivalent reduction in carbon dioxide elsewhere.

Global net-zero 2050 targets cannot be met solely through current reduction commitments. This is why the Voluntary Carbon Market exists and the reason why your support of high integrity carbon projects is vital to bridge the gap.

Projects are categorised as either 'reductions' or 'removals':

- **Reductions:** These projects aim to reduce emissions by preventing them from occurring in the first place. Examples include renewable energy projects and energy efficiency improvements.
- **Removals:** These projects focus on removing existing carbon dioxide from the atmosphere. Examples include afforestation, reforestation, and carbon capture and storage.

In addition, many projects place a strong emphasis on both social and environmental benefits (satisfying UN Sustainable Development Goals). It's essential to note that global net-zero targets cannot be met solely through emission reductions. Support from the voluntary carbon market through carbon finance plays a crucial role in reaching these targets.

All Carbon Footprint's projects score highly across the key criteria of additionality, permanence, measurability, and leakage. Increasing numbers of projects are also gaining ICVCM CCP status, reflecting their high integrity.

You can view and compare the ratings of ca 2000 projects on CRISP – [CRISP – Carbon Ratings InSight Platform](#).

You can purchase your required carbon credits by selecting from a range of high-quality verified projects on the [Carbon Marketplace \(COMP\)](#).

5 Conclusions

Go Cardless Ltd.'s boundaries and system has satisfactorily captured the most significant and relevant emission sources. Although GoCardless continued to report a full scope assessment, the accuracy has decreased since the previous assessment mainly due to a change in internal emission data collection since the previous assessment. Where possible, activity or spend data were provided. However, in some cases such as commuting and homeworking, raw data was unavailable and so data from the previous assessment was used as proxy.

A number of errors were identified during the audit, however all major errors were investigated and corrected during the course of the audit.

The accuracy and quality of the data could be improved. This could be achieved by achieved by implementing the recommendations in Section 4.1.

Overall, the calculations were correct, and the estimation methodologies were considered acceptable.

5.1 Assurance opinion

Based on the results of our Expert Review process, Carbon Footprint Ltd provides limited assurance of the GHG emissions statement, **and found no evidence that the GHG emissions statement:**

- is not materially correct and is not a fair representation of the GHG emissions data and information;
- has not been prepared in accordance with the GHG Protocol, ISO14064-3 standard.

It is Carbon Footprint Ltd.'s opinion that Go Cardless Ltd has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of GHG emissions for the stated period and boundaries.

Appendix 1 – Expert Review Plan

Venue: Online

Present:

Sarah Thornton, Carbon Footprint Ltd, Jamie Nimmo, Go Cardless Ltd

ISO 14064-3 Ref.		ISO 14064-3 Requirements	Evidence	Comments
5.1.3.	Level of Assurance	To be agreed at the beginning	Anecdotal	Limited
5.1.4	Objectives	To be agreed at the beginning	Anecdotal	
5.1.5	Criteria	To be agreed at the beginning	Anecdotal	GHG Protocol, ISO14064-3 standard
5.1.6	Scope	Organisational boundaries, physical infrastructure & activities, GHG sources, type of GHGs, time period	Anecdotal Carbon Footprint Report	Scope 1, 2 & 3 - 1 st January 2024 to 31 st December 2024 - Operational control
5.1.7	Materiality	Establish materiality		Materiality threshold 5%
5.4.4	Expert Review records	The consultant shall maintain records to demonstrate conformity to the requirements of ISO14064-3.	Expert Review plan. Expert Review report.	This Expert Review plan is the basis of recording the audit and capturing information.
6.1.3.3	GHG information system & its controls	Processes for collecting, processing and reporting GHG information.	Anecdotal	
6.1.3.4	GHG data & information	Examination of the GHG data and information.	Sustrax MX data exports and platform information.	
6.1.5	Expert Review Plan	Document assurance level, objectives, criteria, scope, materiality & schedule.	This document	This table documents the Expert Review plan.
6.1.6	Evidence gathering plan		Sampling Plan	See Appendix 2.

ISO 14064-3 Ref.		ISO 14064-3 Requirements	Evidence	Comments
6.3.1	Evaluation of the GHG statement	Evaluate whether the evidence collected supports the GHG statement.	Expert Review report	Sufficient evidence was provided to support the statement.
6.3.1.4	Assessment against Expert Review criteria	Confirm whether the organisation conforms to the Expert Review criteria.	Expert Review report	Organisation has met the Expert Review criteria satisfactorily.
6.3.2 & 6.3.3	Conclusion and opinion	A Expert Review statement containing the level of assurance, objectives, scope, criteria, the GHG statement and the consultants' opinion on the GHG statement.	Expert Review statement	A Expert Review statement will be issued.

Appendix 2 – Sampling Plan

The sampling will be a risk-based approach in order to collect adequate evidence to support the limited level of assurance. Calculations and results will be reviewed and discussed as a desk-based exercise and during the remote audit.

Sites and data sampled were chosen due to materiality to the total carbon footprint, and potential anomalies identified from initial analysis.

Primary data (e.g. utility bills, expense claims, fuel card reports etc.) requested is shown in the following table:

Emissions source	Requested	Provided
Spend	A full spend report (excluding categories already included on Sustrax with activity data)	A full spend report for 2024.
Use of Sold Products	Please provide the annual total for website visits, hours spent on the company dashboard and the total number of online and direct debit payments for the year.	A full report was provided.
Business travel	Please provide a travel report from your travel provider.	A travel report was provided.
Electricity	Please provide evidence of electricity consumption for the London office.	A screenshot of the electricity consumption dashboard was provided.

Secondary data was reviewed for other sites and emission sources.

Appendix 3 – Expert Review Team

Carbon Footprint Ltd has enabled the completion of the carbon footprints of over 20,000 businesses globally via our tools and consultancy. We are confident that we bring independent, ethical conduct, fair representation, due professional care and fresh insights to carbon management and Expert Review activities.

We work with a vast range of companies, from SMEs to multinational blue-chip corporations with goals to comply with legislation, cut the cost of carbon in their business, maximise sales by developing true sustainable credentials and prepare for future legislation.

We are a world leading carbon footprinting company:

- We follow international standards, such as ISO14064-1, PAS2050, GHG Protocol, ISO14064-3 within our work
- We are ISO 14001:2015 and ISO 9001:2015 certified
- We are approved under the Quality Assurance Standard (QAS) – which includes an independent check of our online carbon calculators.
- We work with other businesses to complete/validate GHG emissions for their Mandatory GHG Reporting and CDP reporting requirements
- We run the Carbon Academy (for peer group learning)
- We provide input and advice to the government on low carbon legislation

Sarah Thornton, BSc (Hons)

Sarah has a Bachelor's degree in Geology and Geography (Hons) and is an Environmental Consultant at Carbon Footprint Ltd. She has completed numerous carbon footprint assessments to both the ISO14064-1 and GHG Protocol Standard. Sarah has a particular interest in the role of renewable technologies in driving the global transition to low-carbon systems.

Joe Murray, BSc (Hons), MSc Environmental Consultant

Joe is an Environmental Consultant at Carbon Footprint Ltd, specialising in Greenhouse Gas assessments of organisations in line with ISO14064 and the GHG Protocol. He works with a large range of business customers ranging from SMEs to large corporates.

Dr. Wendy Buckley Client Director / Co-Founder

Wendy has a B.Sc. & Ph.D. in Physics and is also a Member of the Chartered Institute of Marketing with MCIM status. She has held various appointments across the globe in both the public and private sector. She has developed extensive knowledge in manufacturing, thermodynamic processes and low energy solutions. Wendy has won a number of business awards and is Chair Person of the Sustainable Business Network in North Hampshire.