

BARRATT DEVELOPMENTS PLC GREENHOUSE GAS REPORTING METHODOLOGY 2022

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1 Introduction

Reporting period

1st July 2021 to 30th June 2022

This document summarises the reporting methodology for Barratt Developments PLC's (The Group's) consolidated greenhouse gas (GHG) reporting for the above reporting period. This methodology is aligned with the GHG Protocol, and compliant with the GHG emissions and energy consumption reporting requirements of the Companies Act 2006 (Strategic and Directors' Reports) Regulations 2013, and with Streamlined Energy and Carbon Reporting Regulations (SECR) 2019.

1.1.1 Reporting boundaries

The Group reports within its Annual Report and Accounts, Regulatory News Service (RNS) announcement and PLC website on scope 1 and 2 GHG emissions and underlying energy use under the operational control approach. As with previous years, scope 1 and 2 data is sourced from all of the Group's operations, which together extend across England, Scotland and Wales. The Group also reports on its relevant scope 3 emissions.

1.1.2 Reporting framework

The Group has developed and tailored its list of energy and GHG key performance indicators (KPIs) in line with its material issues, business reporting requirements, Corporate Sustainability indexes/surveys and the latest UK guidelines, including:

- The Companies Act 2006
- The Greenhouse Gas (GHG) Protocol (WRI, WBCSD)
- Streamlined Energy and Carbon Reporting (SECR)
- Energy Savings Opportunities Scheme (ESOS)
- Task Force on Climate-related Financial Disclosure (TCFD)
- The Group's KPIs and core sustainability metrics

1.1.3 Greenhouse gases

In accordance with the Kyoto Protocol the Group measures and reports emissions arising from the seven main greenhouse gases that contribute to climate change, namely carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF_6) and nitrogen trifluoride (NF_3).

The effect of these emissions is reported as a single figure, carbon dioxide equivalent (CO₂e), which represents their combined global warming potential.

1.1.4 Emission factors

Greenhouse gas emissions are reported in line with the UK Government's 'Environmental Reporting Guidelines: including Streamlined Energy and Carbon Reporting (SECR)', March 2019 and the Group has used the GHG emission factors outlined in the version of the DEFRA/BEIS 'UK Government conversion factors for Company Reporting' described below.¹

 $^{^1}$ The range of emission sources have a number of greenhouse gas emissions associated with them , and each have different levels of impact on global warming (referred to as Global Warming Potential, GWP). As such, to get a meaningful comparison between the GHG emissions, conversion factors are used to convert the quantities consumed into tCO_2e . CO_2e is a measure for describing the impact of each different GHG in terms of the amount of carbon dioxide that would create the same amount of global warming.

Company reporting period	Defra/BEIS UK Government Conversion Factors
Reporting year:	UK Government conversion factors for company
Financial Year 1 st July to 30 th June 2022 ('FY22')	reporting 2021 v2.00
Comparative year:	UK Government conversion factors for company
Financial Year 1 st July to 30 th June 2021 ('FY21')	reporting 2020 v1.00
Base year:	UK Government conversion factors for company
Financial Year 1 st July to 30 th June 2018 ('FY18')	reporting 2017 v1.00

All diesel used on sites is reported using a 'gas oil' emission factor.

1.1.5 Intensity metrics

To allow for ready comparison, the Group reports both absolute and intensity metrics.

The scope 1 and 2 intensity metric is greenhouse gas emissions normalised by floor area - 'tCO2e per 100m² legally completed floor area'. This metric is used in mainstream housebuilding financial reporting, and therefore encouraged by industry benchmarks such as NextGeneration, with uptake across the industry.

1.1.6 Energy consumption

Energy consumption associated with scope 1 and 2 greenhouse gas emissions is measured and reported in line with SECR reporting requirements. Where available, energy use is captured directly (e.g. MWh of electricity/gas used) or otherwise it is converted from available units to energy units using UK Government conversion factors (e.g. for diesel and LPG).

2 Scope 1 and 2 GHG emissions measurement

2.1.1 Context

Scope 1 comprises direct emissions from sources controlled by the Group, including all joint ventures. These include use of diesel, natural gas and liquid petroleum gas on construction sites and natural gas, biomass fuel and refrigerant losses in our offices, homes pre-sale and other administrative activities. Where we are operating district heating schemes we report emissions net of recharges for customer use, the latter being outside our control. Scope 1 also includes mileage from the Group's owned and leased van and car fleet.

Scope 2 comprises indirect emissions associated with the consumption of energy from purchased electricity and district heat & steam on both construction sites (including all joint ventures) and in offices. Electricity from electric and hybrid vehicles is also included.

The Group does not have any emissions attributable to its own generation of electricity, heat or steam that is sold/transferred to another organisation.

2.1.2 Excluded activities

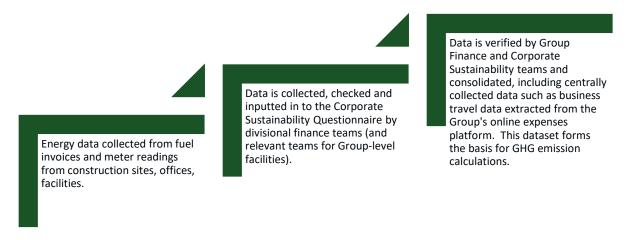
Peripheral or incidental activities, such as the sale of part-exchanged properties, property management and the letting of premises to third parties, have been excluded on the basis of materiality due to very few transactions of these types.

2.1.3 Data collection

Data is collected via the Corporate Sustainability Questionnaire, which is sent out to our business divisions and records utility usages, fuel usage and refrigerant losses on a quarterly basis. Data is derived from meter readings, invoices and mileage claims.

A list of construction sites is obtained from the Group's finance database, which includes legally completed floor areas that are used to calculate intensity figures.

The diagram below shows a summary of the Corporate Sustainability Questionnaire process.



2.1.4 Estimations

Where actual energy usages for all of the individual periods that make up the financial year are not available by the reporting date (e.g. outstanding invoices), the daily average usage based on relevant existing data is calculated and applied pro-rata against the number of missing days estimate the missing period, ensuring the full financial year period is disclosed.

2.1.5 Treatment of Combined heat and power (CHP) / district heating systems

On a small number of sites, the Group utilises energy arising from shared energy centre, district heating or combined heat & power (CHP) systems. Typically, these systems are operated by the Group until they are adopted by an operating company, such as a utility provider or management company. In this intervening period, the Group accounts for the associated energy as follows:

- Where the Group is responsible for the operation of the energy centre prior to adoption it is responsible for the input fuel supply, such as natural gas, electricity or wood chips. The output heat from the energy centre feeds into both handed over and under-construction plots. The Group is billed separately by the utility provider for the under-construction plots that the Group is responsible for via developer supply heat bills; and it receives financial recompense from the utility provider for plots handed over. Therefore, to avoid double counting, the Group only reports its consumption via the developer supply heat bills as purchased district heat & steam.
- On completed sites where the Group no longer has any construction activity, but the energy centre has not yet been adopted by the operating company, the Group excludes all emissions on the basis that it receives financial recompense for all plots.
- Where the Group is responsible for the operation and input fuel supply of the energy centre, but does not receive financial recompense for handed over plots, then the input fuel supply is recorded under the usual reporting terms. However, any outputted heat to properties under construction is excluded to avoid double counting.
- Where energy is outputted by an energy centre adopted by an operating company, the Group receives developer supply heat bills from the operating company (i.e. utility provider), which are recorded as purchased district heat & steam.

2.1.6 Calculations relating to Scope 2 GHG emissions

The Group's scope 2 GHG emissions are calculated and reported using both the location and market-based methods.

2.1.6.1 Location-based method:²

All electricity consumption by the Group occurring in the UK is multiplied by the UK average grid electricity emission factor for the reporting year to calculate the emissions.

2.1.6.2 Market-based method³:

Purchased renewable electricity: For purchased electricity to be considered as being generated by a renewable source under the market-based method (e.g., wind, solar, hydro), this electricity must be matched to the latest available Renewable Energy Guarantee of Origin (REGO) certificates. REGOs must be recognised by Ofgem. One REGO is matched to 1 MWh of electricity, and a REGO is only valid for the reporting year (1st April to 31st March) during which it was issued.

If the Group purchases an electricity tariff that is 100% renewable, all electricity purchased within the REGO reporting period must be backed by REGOs. Renewable Origin Certificates (ROCs) and Levy Exemption Certificates (LECs) serve different roles and cannot be used as evidence that a tariff is from renewable sources. Certain suppliers may provide the ID numbers of REGOs allocated to each client's supply, while others do not. For the Group, there is a period for which electricity purchased on a renewable tariff cannot be evidenced as REGO-backed (April, May and June), because the REGO and company reporting periods do not align; therefore, REGO certificates allocated in a given year may not cover all electricity consumption within that reporting period. In this instance, a reasonable assumption is made that the final three months of electricity on renewable tariffs can also be counted at a zero greenhouse gas emission factor on the proviso of sufficient evidence provided for the July to March period. Where REGO certificates are unavailable at the date of reporting, but the corresponding supplier contractual commitment is for 100% of the supply to be REGO backed, the relevant usage is reported as REGO-backed.

Renewable electricity in landlord-supplied offices: In a number of our leased offices, electricity tariffs are determined by the landlord, which recharge Barratt for electricity consumption through a lease service charge. We have engaged with these landlords to identify supplies that are on REGO-backed renewable tariffs. Where landlords are able to supply evidence of REGO certification, under the market-based approach we account for this consumption at a zero greenhouse gas emissions factor.

Self-generated renewable electricity: When calculating emissions from self-generated electricity, the emission factor used will depend on whether Feed-In tariffs are received for the electricity generation. If Feed-In tariffs are applied, the residual grid emission factor for the corresponding country should be

² The location-based method reflects the average emissions intensity of macro scale (regional/national) electricity grids where energy consumption occurs. Companies should use the regional/national grid-average emission factor. In the UK, this would be sourced from the BEIS UK Government conversion factors for Company Reporting.

³ The market-based method reflects the emissions from the electricity that a company is purchasing. Energy suppliers in the EU are already required, by law, to disclose to consumers the fuel mix and GHG emissions associated with their portfolio or tariffs. As such, companies intending to report a market-based Scope 2 electricity emissions figure should:

[•] Request the emission factor for their tariff(s) from their energy supplier(s).

Request the source of this data (e.g. generator declarations in the UK).

[•] Request the energy generation technologies and mix specific to the supplier / tariff(s).

used in calculations and emissions added to Scope 2. If Feed-In tariffs are not received for the electricity generation then the emission factor applied would be 0.

Non-renewable electricity: A hierarchy approach is used to determine which emissions factor is used for non-renewable electricity under the market-based method:

- 1. Where the Group is aware of the supplier tariff purchased, and the tariff emission factor is available, this is used. Where the supplier is known, but the tariff emission factor cannot be identified, an average factor of the supplier's tariffs can be used, but only where this tariff excludes renewable products (the supplier residual mix).
- 2. Where a supplier residual mix emission factor cannot be obtained, the UK residual grid mix emission factor (which is the UK mix minus the renewables) will be used.

3 Scope 3 carbon emissions

Data from financial year 2018 (1st July 2017 to 30th June 2018) was used as the baseline for assessing the materiality and relevance of the Group's Scope 3 greenhouse gas emissions.

We review the scope of reporting on an annual basis to ensure that all material categories are reported. In accordance with the Greenhouse Gas Protocol, in FY22 9 categories were found to be relevant as follows:

Category	Definition	Method
1) Purchased	Extraction, production,	Estimated through a spend-based method
goods and	and transportation of	whereby cost turnover with suppliers and
services	goods and services	subcontractors is categorised based on industry
	purchased or acquired.	and applied against industry-specific
		Environmental Extended Input-Output (EEIO)
		factors, arising from the OPEN IO database.
2) Capital goods	Extraction, production,	Estimated through a spend-based method
	and transportation of	whereby cost turnover with suppliers and
	capital goods	subcontractors is categorised based on industry
	purchased.	and applied against industry-specific
		Environmental Extended Input-Output (EEIO)
		factors, arising from the OPEN IO database.
3) Fuel and	Extraction, production,	Obtained via the Corporate Sustainability
energy related	and transportation of	Questionnaire. DEFRA/BEIS scope 3 emission
activities	fuels and energy	factors applied.
	purchased or acquired	
	and not already	
	accounted for in scope 1	
	or scope 2.	
4) Upstream	Transportation and	Estimated through a spend-based method
transportation	distribution of products	whereby cost turnover with suppliers and
and distribution	from tier 1 suppliers to	subcontractors is categorised based on industry
	our operations.	and applied against industry-specific
		Environmental Extended Input-Output (EEIO)
		factors, arising from the OPEN IO database.

Category	Definition	Method
5) Waste	Disposal and treatment	Calculated on the basis of average emissions for
generated in	of waste generated in	disposal by tonnage broken down by waste
operations	our operations.	categories and disposal routes supplied by the
		Group's waste contractors, sub-contractors and
		divisions. Office waste is excluded on the basis of
		materiality.
6) Business travel	Transportation of	Business travel mileage in private vehicles and
	employees for business-	public transport is extracted from the Group's
	related activities.	online expenses system, Selenity, based on
		expense claim approval date. These expenses are
		then converted into scope 3 emissions by applying
		DEFRA/ BEIS emission factors.
7) Employee	Transportation of	a) Commuting: Obtained via a self-selecting survey
commuting	employees between	sample of employee commuting habits across all
	their homes and their	of our housebuilding and non-house building
	worksites.	divisions.
		b) Working from home: Estimated additional
		emissions arising from heating, lighting and
		computing equipment based on information on
		hybrid working included in the above survey.
11) Use of sold	End use of goods and	Dwelling emissions rate (DER) based on SAP
products	services sold in the	designed performance (kgCO ₂ e per m ² per year) is
	reporting year.	extracted for properties with SAP certificates
		lodged in the reporting year. This is then cross
		referenced against the Group's sales system to
		extract floor area, date of legal completion and
		property type (private/social/apartment) per plot.
		For properties that completed during the
		reporting year, floor area is multiplied against DER
		to give estimated annual emissions. The
		equivalent energy use is split by gas and electricity
		based on the typical energy use of a UK home and
		applied over the 60-year design life, with the
		electricity component taking into account the
		estimated UK energy fuel mix based on BEIS' 2019
		energy and emissions projections. To estimate the
		emissions associated with properties not included
		on the SAP report (c.10% of total floor area), for
		each property type, emissions are grossed up pro-
		rata based on total floor area completed of that
		property type in the year across the Group.
		Emissions from commercial properties are
		excluded on the basis of materiality.

Category	Definition	Method
12) End of life treatment of sold products	Waste disposal and treatment of products sold in the reporting year at the end of their life.	An industry average for home end of life emissions was multiplied by the number of homes completed in the reporting year. End of life emissions from an average home was determined by third party experts using data from construction clients.

The following scope 3 categories have not been reported since they are either not material or not applicable as follows:

Category	Definition	Rationale
8) Upstream	Operation of assets	Not material:
leased assets	leased by the reporting	The Group's upstream leased assets include
	company.	company vehicles, plant & machinery and leased
		show homes. However, all of the associated
		emissions are already accounted for within our scope 1 and 2 footprint on the basis that we have
		operational control over these assets. There are
		few other upstream leased assets so any
		emissions not already included within scope 1 or 2
		are immaterial.
9) Downstream	Transportation and	Not applicable:
transportation	distribution of products	The homes constructed by the Group are built in
and distribution	sold.	situ and not moved after construction, therefore
		this category is not applicable, so there are nil
10) Processing of	Processing of	associated emissions. Not applicable:
sold products	intermediate products	The Group's operations do not currently include
Sola products	sold.	any processing of sold products. Therefore, this
		category is not applicable so there are nil
		emissions associated with it.
13) Downstream	Operation of assets	Not material:
leased assets	owned by the reporting	The Group has very few downstream leased
	company and leased to	assets. The emissions from the majority of these
	other entities in the	items, such as leased land for site compounds, is
	reporting year.	already accounted for under scope 1 and 2, in line with our operational boundary. However, while
		the Group does sublease a handful of commercial
		properties prior to completion, total commercial
		revenue makes up less than 1% of the Group's
		total revenue, and of this, lease income makes up
		only a very small proportion, so this is deemed
		immaterial.
14) Franchises	Operation of franchises.	Not applicable:
		Barratt does not have any franchises. Therefore,
		this category is not applicable so there are nil
		emissions associated with it.

Category	Definition	Rationale
15) Investments	Operation of	Not material:
	investments (including	All of the Group's subsidiaries and joint operations
	equity and debt	are included within its scope 1 and 2 footprint on
	investments and project	the basis that Barratt is the principal contractor on
	finance).	site, so is deemed to have operational control. On
		the Group's consolidated balance sheet there are
		no other investments not already accounted for
		within scope 1 and 2, so there are nil emissions
		associated with this category.

4 Restatement policy

Whilst the Group's methodology is aligned with the GHG Protocol, guidance regarding the implementation of the Protocol continues to evolve in order to promote consistent and comparable reporting across all entities. The Group may therefore refine its approach in future periods.

In instances where retrospective applications of such refinements exceed the materiality thresholds defined below, the Group will update relevant comparative period information where available to reflect best practice. This includes periods used as the baseline for emissions reduction targets. Barratt define this threshold both quantitatively and qualitatively.

For both scope 1 and 2 and scope 3, the Group considers any variances that would significantly alter stakeholders' interpretations of information presented (i.e. if that variance could be reasonably expected to influence decisions that would be made on the basis of the information presented) to be considered qualitatively material.

Though a quantitative threshold is not defined for scope 1 and 2 in the Greenhouse Gas Protocol, Barratt considers 2% of total scope 1 and 2 in the reporting period to be quantitatively material. In line with the WRI/WBSCD GHG Protocol Corporate Value Chain (Scope 3) Standard, Barratt defines the scope 3 quantitative materiality threshold at 10% of total scope 3 in the reporting period. These materiality thresholds are subject to annual review.

The Group's Science Based Targets are also subject to quinquennial (every 5-years) review, which will include a review of baseline scope 1, 2 and 3 GHG emissions. The Group considers its baseline to assess performance against as FY18, being the period 1st July 2017 to 30th June 2018.

4.1 FY22 mergers, acquisitions and divestments

On 31^{st} January 2022 the Group acquired Gladman Developments Ltd, a leading UK land promoter. Its total scope 1 and 2 emissions for the year-ended 31^{st} March 2022 were 151 tCO₂e, which is less than 1% of the Group's annual total scope 1 and 2 emissions over any of the last 5-years. Therefore, the Group has not rebaselined in line with the restatement policy outlined above.

There were no mergers or divestments during the year.

5 Assurance

Deloitte LLP was engaged to provide independent limited assurance over direct energy consumption, scope 1, scope 2 and selected scope 3 GHG emissions (category 6: business travel; category 3: fuel & energy related activities; and category 11: use of sold products) under the assurance standard ISAE (UK) 3000 and 3410.

Our Assurance Statement and basis of reporting is publicly available on the PLC website.