

# Health, Safety & Environment Policy:

# Net Zero Action Plan

Approved 15<sup>th</sup> December 2022



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## 1 NET ZERO ACTION PLAN STATEMENT

From our inception in 1983 at the Centre for Alternative Technology to the present day, Dulas has prided itself in providing high quality products and services in the renewable energy industry. Our expertise in low carbon technologies have always formed the core of our business and we have maintained a reputation for engineering excellence in this field for over 38 years.

Dulas recognise that today's unprecedented changes in global climate are a direct result of increasing greenhouse gas emissions from human activities. We see climate change to be the most pressing concerns in the world today, and that it is essential that urgent and meaningful action is taken now to avoid and minimise its impacts.

We fully support the goals of Paris Agreement to limit global warming to 1.5 degrees Celsius, compared to pre-industrial levels, and recognise that we have an important role to play both with both the products and services we supply, and the way in which we carry out our business activities to produce them.

Dulas are proud to have joined the United Nations Race to Zero Campaign and in doing so have pledged to:

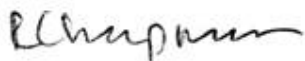
1. Halve our greenhouse gas emissions before 2030
2. Achieve net zero emissions before 2050
3. Disclose our progress on a yearly basis

We do not see the net zero target as the end goal and will look to better this where possible.

As an employee-owned company employee commitment and support is vital to us achieving this goal. Our net zero ambitions have been incorporated into our Company Purpose and Values, which are supported by all our members including our Board of directors.

With over 40 years of experience as a pioneer of renewable energy engineering, Dulas is looking forward to playing our role in National and Global emissions reduction. We also look forward to developing business opportunities and exploring the wider benefits as we journey towards this ambitious but achievable objective.

**Signed:**



**Ruth Chapman**  
Managing Director

## 2 BACKGROUND AND SCOPE

### 2.1 Background

In 2021, Dulas board made a public commitment to reduce its overall net carbon dioxide equivalent emissions to zero by 2050. This puts the company in line with global and UK government commitments achieve the target of net zero emissions and to limit the scale of global temperature warming to less than 1.5 degrees Celsius on average.

As part of that commitment, in 2022 Dulas undertook a review of its emissions during the period of 2019, 2020 and 2021 to establish an emission baseline that will be used to set and monitor reductions in emissions until the achievement of the target by 2050, or sooner.

Following the review, this action plan is the basis by which Dulas intends to achieve publicly stated targets for achievement of Net Zero.

### 2.2 Scope

This policy forms part of the company Health Safety and Environmental policy, which is accredited under the company ISO 14001.

The policy applies to and must be adhered to by all permanent and part-time staff of Dulas Ltd. The policy does not apply to group companies belonging to Dulas Ltd, that shall be subject to their own policies and board approvals.

### 2.3 Policy review and updating

The policy shall be reviewed on an annual basis by the Board of Directors and HSE manager, and updates that are within the scope of implementation shall be incorporated where these are necessary.

Amendments to policy that imply a relaxation, or abandonment of the principal targets outlined in section 3 shall be subject to member approval at the annual general meeting before adoption.

### 2.4 Definitions

The definition of 'zero emissions' in this context shall encompass emissions identified in Scope 1, Scope 2, and Scope 3 of the Green House Gas (GHG) protocol, latest edition.

The term 'tonnes of carbon dioxide equivalent' (tCO<sub>2</sub>e) is that term which is used by the GHG protocol and refers to the basket of various greenhouse gas pollutants that are resolved into a single parameter equivalent to one tonne of carbon dioxide for the purposes of achieving a normalized standard of measurement.

The achievement of 'Net Zero' is understood to mean that the annual ongoing carbon dioxide equivalent (tCO<sub>2</sub>e) emissions caused by, or which are the responsibility of Dulas through its supply chain, are:

- zero, or
- negligible (i.e., measurably equivalent to zero for all practical purposes), or
- equivalent to zero or less through means of verified emissions offsets that the company chooses to engage with.

The definition of emissions in this context shall encompass emissions identified in Scope 1, Scope 2, and Scope 3 of the Green House Gas (GHG) protocol of the most recently published edition. Wherever the term 'emissions' is used in this policy, it should be generally understood to refer collective tCO<sub>2</sub>e emissions, unless otherwise stated.

Net Zero in this context does not refer to reversing the historic company emissions through methods of offset, or air carbon capture that seeks to reverse pollutants already dispersed into

the atmosphere through previous company activities. The company acknowledges that the technology to achieve this may exist in the future.

## **2.5 Roles and responsibilities**

The Dulas Board of Directors take overall strategic responsibility for the company's commitment to achieving Net Zero by 2050.

It is the responsibility of the Executive Managing Director (EMD) to ensure that this policy is implemented. The EMD will review the document and progress of the Net Zero Action Plan annually.

This document and review process is to be managed by the HSQE Manager as part of the HSE integrated management system.

The company Facilities Manager shall be responsible for the procurement of electricity and the implementation of any green tariffs that may apply.

The company Head of Finance shall ensure the data regarding the annual actual emissions from shall be collated, audited and published in the annual accounts each year.

## **3 ASSESSMENT AND MONITORING**

### **3.1 Data collection**

Effective from 1<sup>st</sup> January 2019, Dulas shall collate, record, and make available to company members the baseline emissions data relevant to the company scope 1 and scope 2 emissions on an annual basis thereafter.

Effective from 1<sup>st</sup> January 2025 Dulas shall collate, record, and make available to company members the baseline emissions data relevant to the company scope 3 emissions on an annual basis thereafter.

Responsibility for the collection and recording of data shall be through company finance processes and utility bills.

### **3.2 Calculation and reporting**

The calculation of the annual company emissions from the baseline data shall be the responsibility of the company Head of Finance.

Accounting of company emissions shall take account of best practice methodologies developed in the GHG protocol and shall use the conversion factors published by HM government that are updated on an annual basis. More information about these can be found at website or office of the Department for Business, Energy, and Industrial Strategy (BEIS).

The calculation of the company annual emissions for each year shall be completed in time for publication in the Dulas annual statement of accounts, and all methodologies, data and calculation assumptions shall be made available for inspection by third party auditors.

The calculation and results presented shall be a true reflection of the status of company emissions and shall be made available to the Members for scrutiny prior to publication in the accounts.

The reporting format shall be clear and understandable, and shall publish as a minimum:

- the total annual emissions from the Company for the year concerned,
- the emissions intensity per revenue in £ sterling,
- the emissions intensity per FTE employee

The company may elect at their discretion to publish figures for scope 1 and 2 combined, and data for scope 3 emissions separately.

#### **4 NET ZERO TARGET SETTING**

##### **4.1 Annual emissions targets**

Effective from 1st January 2023 the company shall declare a public commitment to achieving Net Zero across its business activities by no later than 2050. The company affirms that this target shall be taken to mean in the scope 1, scope 2 and, where possible, scope 3 emissions categories.

At least once per year starting in 2023, the company shall review and publish annual target emissions to be achieved (or lower) for each year starting from 2023 until 2050.

Emissions intensity targets shall always be set so as to achieve an annual reduction every year. At the discretion of the EMD, the company may elect to adopt total emissions targets that reflect the overall size of the business in terms of revenue and numbers of people.

The progress towards emissions targets shall be published in in the annual accounts alongside the targets themselves each year in a clear and easily understandable format.

The initial emissions targets are provided in tables 1 & 2 in annex 1. Scope 3 emissions targets shall be updated when baseline studies are completed and published for the year of 2025 but shall be published in any case no later than the 1<sup>st</sup> of January 2027.

##### **4.2 Emissions offsets**

The company may elect to meet a portion of annual emissions target using emissions offsets, also sometimes known as carbon credits.

The decision to do this shall be at the discretion of the EMD. In such cases the methodology or organization used for the offset shall be verified by independent third party accreditors as being appropriate for carbon offset activities and subject to approval by the board of directors.

#### **5 POLICY IMPLEMENTATION AND EXCEPTIONS**

- a. The company affirms that precedence should be given to implementing measures, or choosing business activities, suppliers, or equipment, which help the company to reduce emissions and contribute to the targets set. In circumstances where there are one or more options available at any point of decision making for procurement or business activity, a clear preference shall be given to take the least emissions route forward, or lowest emission option available.
- b. Exceptions to the policy outlined in 4 (a) are permitted only in cases where:
  - i. in the opinion of the EMD, it would significantly impact the profitability of the company and/or the current or future going concern of the business,
  - ii. in the opinion of the EMD, it would result in a health and safety risk that would be unacceptable or not quantified,
  - iii. in the opinion of the EMD implementing the measure or activity would be impractical or impossible to achieve because of technical limitations.
- c. Any exceptions to the policy stated above must be approved by the EMD. A record of policy exceptions that were enacted shall be kept, stating the reason, and made available to members if so requested.

#### **6 SPECIFIC POLICY MEASURES FOR IMPLEMENTATION**

- a. Preference shall be given towards green electricity suppliers, and all company properties ought to be on a green electricity tariff by no later than 2030 (i.e. zero emission electricity supply).
- b. The company vehicle fleet shall be fully converted to zero emissions vehicles by 2030. No new fossil powered fleet vehicles shall be purchased after 2025, unless a policy exception is invoked as described in section 4.
- c. Where feasible to do so, the company owned facilities shall be converted to electrical heating systems such as heat pumps or electric boilers, by no later than 2035.
- d. Company air travel to destinations within the UK shall not be permitted, unless approved by the EMD.
- e. The company shall promote the installation of solar energy systems on the properties they are responsible for as far as reasonably practicable.
- f. Travel on electric vehicles for company business will be encouraged and enabled where possible.
- g. Dulas shall seek opportunities to invest in, refurbish and/or install clean energy solutions, such as wind energy generators, on properties that they are responsible for and/or development sites and present a report to members on the feasibility or progress of such by the end of 2025.
- h. The company shall run a program of annual training, once per year, of awareness raising and training for its staff members on the topic of reducing the company emissions. The campaign will be based around a culture of transparency and counting of emissions in order to gain a true visibility of the company progress against targets.
- i. The company shall seek to incentivise employees to consider and reduce their own carbon impact during and outside of their working week where possible.
- j. A plan shall be put in place in 2023 to ensure our company wide working practices, policies and procedures are reviewed and updated, where relevant, to ensure all employees make decisions which consider and reduce carbon emissions in the delivery of our operations.

**ANNEX 1: DULAS NET ZERO EMISSIONS TARGETS**

**Table 1**

		Scope 1 & 2 Emissions			
		Emissions Intensity Per Employee (tCO <sub>2</sub> e)	Emissions Intensity Per £ Sterling Revenue (tCO <sub>2</sub> e)	Total Emissions (tCO <sub>2</sub> e)	Target Reduction from baseline (%)
<b>Baseline</b>	<b>2019</b>	<b>1.11</b>	<b>9.40</b>	<b>84.23</b>	Baseline
Target	2023	0.94	7.99	71.60	15
Target	2024	0.78	6.58	58.96	30
Target	2025	0.66	5.64	50.54	40
Target	2026	0.55	4.70	42.12	50
Target	2027	0.50	4.23	37.90	55
Target	2028	0.39	3.29	29.48	65
Target	2029	0.33	2.82	25.27	70
Target	2030	0.28	2.35	21.06	75
Target	2031	0.22	1.88	16.85	80
Target	2032	0.21	1.79	16.00	81
Target	2033	0.20	1.69	15.16	82
Target	2034	0.19	1.60	14.32	83
Target	2035	0.18	1.50	13.48	84
Target	2036	0.17	1.41	12.63	85
Target	2037	0.16	1.32	11.79	86
Target	2038	0.14	1.22	10.95	87
Target	2039	0.13	1.13	10.11	88
Target	2040	0.12	1.03	9.27	89
Target	2041	0.11	0.94	8.42	90
Target	2042	0.10	0.85	7.58	91
Target	2043	0.09	0.75	6.74	92
Target	2044	0.08	0.66	5.90	93
Target	2045	0.07	0.56	5.05	94
Target	2046	0.04	0.38	3.37	96
Target	2047	0.03	0.28	2.53	97
Target	2048	0.02	0.19	1.68	98
Target	2049	0.01	0.09	0.84	99
Target	2050	0.00	0.00	0.00	100

*Based on the company operations and number of employees as at the time of the baseline assessment.*



Table 2

		Scope 3 Emissions			
		Emissions Intensity Per Employee (tCO <sub>2</sub> e)	Emissions Intensity Per £ Sterling Revenue (tCO <sub>2</sub> e)	Total Emissions (tCO <sub>2</sub> e)	Target Reduction from baseline (%)
Baseline	2025	TBC	TBC	TBC	Baseline
Target	2026				5
Target	2027				15
Target	2028				30
Target	2029				45
Target	2030				55
Target	2031				60
Target	2032				65
Target	2033				70
Target	2034				75
Target	2035				80
Target	2036				82
Target	2037				84
Target	2038				86
Target	2039				88
Target	2040				90
Target	2041				91
Target	2042				92
Target	2043				93
Target	2044				94
Target	2045				95
Target	2046				96
Target	2047				97
Target	2048				98
Target	2049				99
Target	2050				100

## 7 DOCUMENT HISTORY

Rev	Date	By	Summary
A	15/12/2022	Members	Members approved version at the 2022 AGM
	2023		
	2024		
	2025		