

**Basketdrop**

**Carbon Reduction Plan 2023©**

Supplier name: Basketdrop Ltd.

Publication date: 14/03/2023

### **Commitment to achieving Net Zero**

Basketdrop is committed to achieving Net Zero emissions by 2040. Ten years ahead of the government target. We have developed a plan as part of our 'Supply Code of Conduct' which will be updated annually. All emissions reported and future plans will include any future entities or subsequent Basketdrop Ltd. subsidiaries.

### **Baseline Emissions Footprint**

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

#### **Baseline Year: To December 2022**

#### **Additional Details relating to the Baseline Emissions calculations.**

In accordance with new requirements, we shall report on Scope 1, 2 and 3 emissions from 2023 onwards. Scope 1, 2 and 3 have been reported as zero due to a lack of data collected. Scope 3 data has not been collected or reported for the past four years as this was not required, but as per reporting guidance, vehicle emissions will be included in Scope 3 calculations. We are in the process of gathering Scope 3 emissions data to establish a clear baseline and will include this in our SECR report for the current financial year, ending 31 Jan 2024.

#### **Baseline year emissions: 01<sup>st</sup> January 2021 – 31<sup>st</sup> December 2022**

<b>EMISSIONS</b>	<b>TOTAL (tCO<sub>2</sub>e)</b>
<b>Scope 1</b>	0.00 (no onsite combustion of fuel for heating)
<b>Scope 2</b>	Purchased electricity from facilities: 0.00 Purchased electricity from data centres: 0.00
<b>Scope 3 (Included Sources)</b>	Waste generation: 0.00 Business Travel: 0.00 Employee commuting: 0.00 Downstream transportation: 0.00

<b>Total Emissions</b>	<b>0.00</b>
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## Current Emissions Reporting

**Reporting Year: 13<sup>th</sup> March 2023 – 13<sup>th</sup> March 2024**

<b>EMISSIONS</b>	<b>TOTAL (tCO<sub>2</sub>e)</b>
<b>Scope 1</b>	0.00 (no onsite combustion of fuel for heating)
<b>Scope 2</b>	Purchased electricity from facilities: 0.00 Purchased electricity from data centres: 0.00
<b>Scope 3 (Included Sources)</b>	Waste generation: 0.00 Business Travel: 0.00 Employee commuting: 0.00 Downstream transportation: 0.00
<b>Total Emissions</b>	<b>0.00</b>

\* Categories 5 (waste generated in operations), 6 (business travel), 7 (employee commuting) and 9 (downstream transportation and distribution) will be included in our scope 3 calculations. Category 4 (upstream transportation and distribution) will also be included when that data is available. We will work with our partners to ensure category 4 emissions are recorded regularly.

## Emissions reduction targets

To continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets.

We will reduce our carbon emissions from Scope 1 and 2 emissions to achieve NetZero by 2040 and will put in place interim targets to ensure sufficient progress is made.

Whilst we are working towards a net zero target, we have no data to report from our base year to the current year. This, however, is not a true representation of the impact of our carbon reduction projects and is a result of having been unable to capture data for emission sources.

Once we take a deep dive into our previous emission sources, we shall be able to better identify gaps in our reportable scope 1, 2 and 3 emissions. As it stands, Scope 1 emissions are reported as zero, however we can identify some potential sources. We will be working with clients, trade partners and suppliers to confirm that these sources fall within in our

operational control. Likewise, for scope 2 emissions we need to confirm operational control/reporting responsibilities to ensure that there is no double counting in this area. We are aiming to get this data collected by Jan'24 and will update the current reporting year accordingly.

With a limited understanding of our emission sources, we need to identify new mechanisms to have in place to capture additional data. Our recent 'Code of Conduct' for our suppliers sets that out. It is recognised that we will need to recalculate our baseline so that we can demonstrate progress on a like for like basis. The intention is to use the reporting year to Jan '24 as the revised baseline.

As part of the review of our carbon emissions we will also be considering our target date for achieving NetZero from 2040 and exploring possibilities to bring this forward. To ensure that we are progressing to plan interim milestones/targets will be established.

## **Carbon Reduction Projects**

The following environmental management measures and projects have been completed or implemented since the 2023 baseline. The carbon emission reduction achieved by these schemes equate to **0.00 tCO<sub>2</sub>e**, a **0%ge** reduction against the 2022 baseline and the measures will be in effect when performing the contract.

### **Completed Carbon Reduction Initiatives**

The following environmental management measures and projects have been completed or implemented since the start of our baseline year 2023:

## **Combustible Dust Hazard Management**

**Supplier Code of Conduct Requirements** Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.

### **Supplier Responsibility Standards**

#### **1. Identification and Evaluation of Potential Hazards**

**1.1 Identification of Potential Hazards** Any Dust used or created by one of the following processes shall be considered a **Potential Combustible Dust Hazard**:

- A process where a dry or wet Dust collector is being used to collect Dust.
- Any grinding, sanding, shredding, cutting, milling, routing, or drilling process that creates Dust.
- Any polishing or buffing process that creates Dust.
- Any other process or manufacturing operation that generates or handles Dust or media blasting or other powders.

**1.2 Evaluation of Potential Hazards** Supplier shall evaluate all identified Potential Combustible Dust Hazards as follows:

- The Dust must be tested to determine whether it is explosive by first testing in a Modified Hartmann Lucite tube with a constant arc energy source of 10 joules and if not explosive in this

test, conducting a subsequent test in a 20-liter vessel according to ASTM E1226 Go/No-Go Screening Test criteria.

- If the Dust is determined to be explosive, Supplier shall have the Dust tested to determine its **Kst** and **Pmax** (Explosion Severity Test ASTM E1226) and **Minimum Ignition Energy** (ASTM E2019) values.
- If the sample is not ignitable in the Modified Hartmann Lucite tube, the Minimum Ignition Energy test is not required and the Minimum Ignition Energy shall be reported as greater than 10 joules.
- If the **Kst** value is greater than 0 bar·m/sec, the Dust shall be deemed a Combustible Dust and those areas of the facility where the **Combustible Dust** is present, in sufficient quantities to create a deflagration or explosion, shall be deemed to contain a **Combustible Dust Hazard**.
- If the Dust is determined to be explosive, it shall be deemed a Combustible Dust and those areas of the facility where the Combustible Dust is present shall be deemed to present a Combustible Dust Hazard.
- Supplier shall document each Potential Combustible Dust Hazard and permanently maintain such records. At least once per quarter or upon Basketdrop's request, Supplier shall submit records of Combustible Dust to Basketdrop.

### **Principal Transport Emissions**

Balancing a transport operation with the need to protect the environment is challenge. There are two major impacts HGVs have on the environment: greenhouse gas – CO<sub>2</sub>; and air pollution – NO<sub>2</sub>, NOx, PM:

- CO<sub>2</sub> Carbon Dioxide: Principal greenhouse gas related to climate change.
- NO<sub>2</sub> Nitrogen Dioxide: A gas formed by combustion, identified as an air pollutant harmful to human health. The European limit values measure concentrations of NO<sub>2</sub> in the air.
- NOx Nitrogen Oxides: A generic term for Nitrogen Dioxide (NO<sub>2</sub>) and Nitrogen Monoxide (NO), which can form NOx in the atmosphere. Euro standards set limits for vehicle emissions of NOx.
- PM Particulate Matter: A mixture of various solid and liquid particles of various chemical compositions suspended in the air. PM is rated by the size of harmful particles:
  - PM10 Particulate Matter;
  - PM2.5 Particulate Matter.

### **Vehicle Depots**

- Size, siting, access and egress
- Noise, fumes, vibration and light emitted
- Obstruction
- Disposal of waste
- Recycling levels
- Energy use
- Pollution
- Material handling equipment (MHE) operation
- Times of operation

### **Vehicle Operations**

- Engine, exhaust, tyre, body and loading/unloading noise
- Smoke, fumes, gases, spray emitted
- Fuel/oil consumption
- Visual impact

- Driver standards
- Routes and schedules
- Load and vehicle utilization
- Waste and general recycling
- Vehicle and component recyclability

## **Oil Storage**

**The Control of Pollution (Oil Storage) Regulations 2001** apply to operators who store more than 200 litres of oil on any site that is located near to a river, waterway, borehole or even close to the water table. These regulations require the person with custody of the oil to carry out such works or to take such precautions or actions as are necessary to minimize the risk of oil-related water pollution. The regulations specify technical details relating to the storage facility, particularly its bund base and wall, which must have a capacity of 110 per cent of the capacity of the tank and be checked regularly, along with the pipework, valves and gauges. It is essential that the tank or its pipework are not positioned where there is a risk from vehicle impact, especially when reversing. To prevent oil-contaminated water entering the public surface water sewer, an 'interceptor' should be incorporated into the operating centre's internal drainage system.

## **Possible Solutions**

Transport managers and small fleet operators steps towards improving the environment. The following list provides just a few examples.

### **In the Depot**

- Examine the way that waste material is stored, recycled and disposed of.
- Ensure that controlled waste is correctly and safely stored on site and then handed over to licensed disposal contractors.
- Avoid burning of waste, which can cause pollution and lead to complaints.
- Ensure that recyclable material is identified and saved for proper disposal –including waste paper and packing materials from office and stores.
- Take steps to ensure that vehicle washing does not result in dirty (i.e. grease-laden) water draining on to neighbouring properties as well as into sewage systems.
- Ensure that oil and fuel spillages do not pollute drains and are cleaned up immediately.
- Consider the use of recycled products such as paper for administrative uses and packing.
- Undertake regular depot clean-up campaigns (in particular, ensuring that the outside appearance of the depot is 'environmentally friendly' to local residents, business visitors and others).
- Consider involving customers and suppliers in developing more environmentally acceptable ways of working.
- Ensure noise from reversing alarms, site music and Tannoy systems and vehicle in-cab radios, etc, is not excessive or generated outside of normal working hours.
- If possible, also try to engage local residents and businesses and develop discourse.

### **On the Vehicle**

- Ensure that legal requirements regarding noise, smoke, exhaust emissions and spray suppression are fully complied with.
- Take steps to economize on fuel consumption.
- Invest in the latest alternative-fuel technology.
- Provide driver training to ensure fuel-efficient driving.
- Fit body skirts and air deflectors and use aerodynamic 'curve top' trailers and bodies.
- Specify lifting and/or steering axles, where possible.
- Ensure that drivers obey rules about parking and causing obstruction with their vehicles, and are aware of the problems of visual intrusion, noise and vibration on domestic properties.
- Route vehicles and plan journeys to avoid congestion – ensure full utilization of vehicles to avoid extra or unnecessary journeys (which add to congestion, air pollution and other costs).
- Fit rubber 'buffers' to tail-lifts and roller doors, and switches to reversing alarms to reduce noise during the 'silent hours'.

- Consider the visual impact of vehicles in terms of their general appearance and livery (change aggressive liveries to present a 'softer' image).

### **In the Community**

- Consider the sponsorship of local community efforts to improve the environment and encourage staff to undertake environmental protection projects.
- Make it known that local residents are able and welcome to discuss issues with management.

The International Organization for Standardization (ISO) has developed a set of internationally recognized standards so that businesses can monitor and control the environmental effects of their activities. The key stages in developing an environmental management system in compliance with the ISO 14001 Standard are as follows:

- Draw up an environmental policy.
- Carry out environmental impact assessments (EIAs) as a part of expansion and new-build projects.
- Set targets and make plans to achieve those targets.
- Implement the plans and ensure that information is communicated to all relevant staff.
- Measure results and compare these to the set targets, take corrective action where necessary and implement a system for regular reviews of the policy.
- Invite local community members to visit the depot and discuss their concerns (work with them, not in isolation).

### **Battery Electric**

Pure battery electric vehicles (EV) are powered entirely by an electric motor using energy stored in a battery. Drivers can charge vehicles at home provided they have access to off-road parking and a charging point or an on-street charging bay. BEVs have zero tailpipe emissions, although if charged from the UK grid there will be emissions associated with the electricity generation.

### **Hydrogen Fuel Cell**

Hydrogen is used to generate electricity through an electrochemical process in a fuel cell. The electricity drives an electric motor and the only waste output is water. Fuel cells can be retrofitted to battery electric vehicles. The OEM hydrogen fuel cell market in the UK is emerging very slowly.

### **Hydrogen Diesel Hybrid**

If you burn hydrogen (H<sub>2</sub>), you get water (H<sub>2</sub>O). It is possible to construct a dedicated hydrogen-powered internal combustion engine. However, the ICE engine is not very efficient when run on hydrogen and the vehicle's range is limited by the size of the hydrogen storage tank. A viable alternative is a hydrogen–diesel hybrid and there are companies who offer dual-fuel conversions.

### **Compressed Natural Gas**

Compressed Natural Gas (CNG) vehicles use mains gas and can be refuelled from an on-site refuelling facility if the local gas network can supply the required pressure. CNG is stored on the vehicle in pressurised cylinders and used in a spark ignition engine. CNG is a fossil fuel but biomethane is available which is a renewable and sustainable version. Biomethane is produced from organic waste and injected into the national gas grid in the same volume that you are drawing methane from the grid.

### **Liquefied Natural Gas**

Liquefied Natural Gas (LNG) vehicles have achieved steady growth in recent years and are already very popular in Europe. At least three major truck manufacturers already offer, or plan to offer, gas-powered vehicles. Retrofit conversions are also possible.

### **Biodiesel**

Biodiesel can be a sustainable and renewable source of energy if it is made using waste products such as vegetable oils and fats. First-generation biofuels which involved growing crops to produce fuel should not be used. Instead, only biodiesel made from waste products, such as used cooking oil, should be used. Fuel suppliers can blend biodiesel into regular diesel up to seven per cent, known as B7, and that is compatible with any vehicle. Higher blends such as B20 and B30 are

widely available and can be used in most engines requiring no modifications. Hydrotreated Vegetable Oil (HVO) can be used in blends up to 100 per cent.

## **Solid Waste Management**

**Supplier Code of Conduct Requirements** Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle Hazardous Waste and non-Hazardous Waste.

### **Supplier Responsibility Standard**

**1. Regulatory Permits** Supplier shall have the required environmental permits and other required approvals for its current operations. Supplier shall plan and provide adequate time to update current environmental approvals and permits for any **Alteration** that may change the environmental impact of Supplier's operations. Supplier shall comply with applicable **Hazardous Waste** permitting and reporting requirements in accordance with applicable regulations. Supplier shall perform the following actions:

- Register all Hazardous Waste in accordance with applicable regulatory requirements
- Obtain permits for pollutant discharge, Hazardous Waste handling, Hazardous Waste storage, and Hazardous Waste transport in accordance with applicable regulatory requirements
- Report any Alteration that may change the status of registration and permitted Hazardous Waste generation to the appropriate local and national regulatory agencies.

**2. Directly Responsible Individual(s)** Supplier shall identify the responsible individual(s) responsible for Hazardous Waste management.

**3. Identification of Waste Streams** Supplier shall identify all sources of **Waste** and characterize each Waste stream as either Hazardous Waste or **Non-Hazardous Waste** as per applicable regulations, or, if no regulations apply, in accordance with this Standard. Supplier shall develop and maintain a Waste inventory for all Waste generated. The Waste inventory shall include generated quantities of Waste per month, the Waste category (Hazardous or Non-Hazardous), the method of disposal, recycling, or other disposition for all Waste, and names of Waste transport and disposal vendors. Supplier shall review the facility Waste inventory annually. Supplier shall update the Waste inventory to reflect any process or production changes.

### **Control of Waste**

**4.1 Waste Collection and Storage Practices** Supplier shall segregate Hazardous Waste from Non-Hazardous Waste per applicable regulations and this Standard. Supplier shall implement responsible Waste collection and storage practices, including but not limited to:

- Collection and storage of Waste in appropriate containers based on their chemical and physical characteristics
- Secondary Containment during the collection and transfer of Hazardous Waste from production areas to Hazardous Waste storage areas
- Standardized labelling of Waste containers in accordance with Applicable Laws and Regulations. At a minimum, each label shall include the type of Waste, appropriate hazard warnings, and the date of Waste origination.
- Maintenance of Waste containers in good condition and capable of preventing leaks or spills
- Onsite storage of Hazardous Waste shall not exceed the period required by applicable local regulations.
- Weekly inspection of Hazardous Waste containers to ensure container integrity, to prevent and control leaks, and to identify and correct missing or incorrect labels. Supplier shall maintain written copies of these weekly inspections.

**4.2 Hazardous Waste Storage Areas** Supplier's Hazardous Waste storage areas shall meet the following requirements:

- Construction materials and electrical equipment shall be compatible with the Hazardous Waste stored.
- Signage shall be posted inside and outside the Hazardous Waste storage areas to indicate: - The nature of any hazards posed by the Hazardous Waste - Any personal protective equipment

required to enter the area - Any labelling stipulated by applicable regulations and standards - Any restrictions on smoking and other activities

- Unauthorized access to Hazardous Waste storage areas shall be prevented
- An enclosure or other covering that prevents exposure to the elements
- Equipped with Secondary Containment that will capture and hold leaks or spills
- Designed and constructed to prevent spills or leaks from the Hazardous Waste storage area from contaminating surface water or groundwater, or from entering storm drains or sewers
- Firefighting equipment shall be readily available and accessible
- A working alarm system that will alert facility workers and outside emergency responders in the event of an emergency
- Forced ventilation equipment for areas where volatile, acidic, caustic, or corrosive substances are stored
- Personal protective equipment for workers handling Hazardous Waste
- Storage area for personal protective equipment outside the Hazardous Waste storage area that maintains the integrity and functionality of the equipment
- Sufficient space for the ingress, egress, and other movement of emergency response personnel and equipment.

**Disposal of Waste** Supplier shall only use licensed and qualified Hazardous Waste transporters. Supplier shall conduct due diligence of the treatment method utilized by their contracted waste disposal vendors (including Hazardous Waste and Non Hazardous Waste disposal vendors) to dispose waste. If an environmental violation is identified, supplier shall:

- Notify Basketdrop of the Hazardous Waste transporter and its violation.
- Work with the Hazardous Waste transporter to develop, implement, and monitor corrective actions.
- Obtain approval for Hazardous Waste transfers from each applicable regulatory agency in accordance with applicable regulations.
- Complete written records and manifests for all Hazardous Waste disposal activities in accordance with local and national regulations.
- Submit copies of records, manifests, and other required documentation to the appropriate authorities and regulatory agencies, and any relevant third parties (transporters and receivers) in accordance with applicable requirements.

**6. Emergency Response** Supplier shall designate at least one properly trained **Emergency Coordinator** on the premises with the responsibility for coordinating all facility emergency responses and reporting activities. An Emergency Coordinator shall be on the premises whenever the facility is in operation. Supplier shall conduct emergency response drills related to potential Hazards of the facility annually, or such other time period specified by applicable regulatory requirements, whichever is shorter. Supplier shall establish a written **Emergency Response Plan** to minimize the risks to human health and the environment. The Emergency Response Plan shall include:

- Internal reporting and notification requirements
- Names and contact information for responsible facility personnel, local fire and emergency response contacts, and local hospitals and other appropriate medical contacts
- Identification and assessment of immediate potential threats, including risks of fire or explosion, as well as spillage or leakage, from facility processes and storage areas
- Emergency evacuation routes, procedures, and controls
- Detailed procedures for control and containment of released Hazards
- Proper clean-up and disposal of any released Hazardous materials.

**7. Operations and Maintenance** Supplier's pollution control technologies shall be operational prior to Supplier generating any Waste. Supplier shall plan and provide adequate time to implement controls and obtain approvals for any Alteration that may change the identification, collection, storage, handling, and disposal of Hazardous Waste. Supplier shall maintain a Waste minimization plan to assess onsite Hazardous Waste generation and to identify opportunities to minimize Hazardous Waste. If the facility's environmental permit requires meeting Hazardous Waste

minimization goals, Supplier shall develop and implement a plan to meet the regulatory agency's Waste minimization goals.

**8. Training and Communication** Supplier shall provide worker training for Hazardous Waste handling, storage, emergency response actions, and proper record keeping.

**9. Documentation** All Waste management records and documentation shall be made available to Basketdrop for review upon its request. Supplier shall retain the documentation related to Waste management as follows:

- Employee training records for the previous 5 years or such other period specified by applicable regulatory requirements, whichever is longer.
- Employee medical records for the length of employment plus 30 years or as required by applicable regulatory requirements, whichever is longer.
- Current and historical copies of permits and registrations as required by applicable regulations or this Standard
- Current Hazardous Waste inventory
- Documentation showing Hazardous Waste is removed from the storage unit at least once per applicable accumulation period
- Hazardous Waste manifests and other shipping records shall be retained for 5 years
- Current list of vendors performing reuse, recycle, transport, or disposal of Hazardous Waste directly for the Supplier
- Incident records regarding all Hazardous Waste incidents at the facility shall be retained for 5 years.

## Water and Wastewater Management

**Supplier Code of Conduct Requirements** Supplier shall implement a systematic approach to identify, control, and reduce wastewater produced by its operations. Supplier shall conduct routine monitoring of the performance of its wastewater treatment systems.

### Supplier Responsibility Standards

**1. Regulatory Permits** Supplier shall obtain, retain, and manage valid or current copies of all necessary **Process Water and Wastewater** permits, licenses, registrations, and regulatory approvals as required by applicable regulatory requirements, including but not limited to:

- Environmental approval for current production
- New, additional, and/or amended or updated permits/registrations prior to any **Alterations**.
- All wastewater discharge and water usage permit(s) per Applicable Laws and Regulations.
- Reports and/or registers of Process Wastewater discharges in accordance with Applicable Laws and Regulations.
- Where mandated by Applicable Laws and Regulations, Supplier shall develop and maintain a water monitoring system to ensure the continuance and effectiveness of water management.

**2. Directly Responsible Individual(s)** Supplier shall identify a specific individual or individuals within the facility organization who will be responsible for all aspects of Process Wastewater discharge treatment, including maintenance and inspection of WWTP, monitoring of Process Wastewater discharge, and responding to emergencies.

**3. Identification of Process Wastewater Sources** Supplier shall identify and characterize all Process Wastewater streams. Supplier shall organize and maintain Process Wastewater stream inventory:

- The inventory shall include the composition and volume of each Process Wastewater stream.
- Supplier shall revise the inventory after any Alteration likely to affect Process Wastewater.
- Supplier shall review the inventory annually.

**Control of Process Wastewater Discharge** Supplier shall install and maintain appropriate Process Wastewater treatment systems in order to reduce the pollutant contribution of each of its facilities to levels compliant with Applicable Laws and Regulations. Supplier's Process Wastewater

treatment system shall be operational prior to use of corresponding production equipment. Supplier shall:

- Comply with all Applicable Laws, Regulations, and requirements related to Process Wastewater discharge
- Update control technologies before any Alteration takes effect
- Verify compliance with current Process Wastewater discharge requirements
- Not intentionally dilute Process Wastewater to meet permit requirements and/or regulatory standards
- Comply with the recycle and reuse requirements for Process Wastewater as required by relevant regulatory agencies
- Treat and/or discharge Process Wastewater according to the approved environmental permits and other Applicable Laws and Regulations. If no Process Wastewater is allowed to be legally discharged, the Process Wastewater shall be handled in accordance with Applicable Laws and Regulations and Basketdrop Standards. If local requirements are not available for a pollutant, the thresholds specified in the Basketdrop Wastewater Discharge Quality Standards table shall be used:

Parameter	Discharge Limit to Wastewater Treatment Plant	Discharge Limit to Surface Water
Temperature	40°C	3°C increase of receiving water body
pH	6.0 – 9.0	6.0 – 9.0
Chemical Oxygen Demand (CODcr)	300 mg/L	100 mg/L
5-day Biochemical Oxygen Demand (BOD5)	150 mg/L	20 mg/L
Total Suspended Solids (TSS)	300 mg/L	20 mg/L
Fluoride	20 mg/L	5 mg/L
Total Nitrogen	70 mg/L	10 mg/L
Nitrites (NO2-N)	Not Applicable	1 mg/L
Nitrates (NO3-N)	Not Applicable	10 mg/L
Ammonia Nitrogen	25 mg/L	5 mg/L

Parameter	Discharge Limit to Wastewater Treatment Plant	Discharge Limit to Surface Water
Total Phosphorus	8 mg/L	1 mg/L
Oil and Grease (O&G)	20 mg/L	5 mg/L
Total Arsenic	0.2 mg/L	0.01 mg/L
Total Cadmium	0.05 mg/L	0.02 mg/L
Total Chromium	1 mg/L	0.05 mg/L
Hexavalent Chromium	0.1 mg/L	0.01 mg/L
Total Copper	0.5 mg/L	0.5 mg/L
Total Lead	0.2 mg/L	0.1 mg/L
Total Mercury	0.005 mg/L	0.002 mg/L
Total Nickel	0.5 mg/L	0.1 mg/L
Total Silver	0.1 mg/L	0.1 mg/L
Total Zinc	1.5 mg/L	0.5 mg/L
Cyanide	0.2 mg/L	0.15 mg/L

## Stormwater Management

**Supplier Code of Conduct Requirements** Supplier shall implement a systematic approach to prevent contamination of Stormwater runoff. Supplier shall prevent illegal discharges and spills from entering storm drains, the public water supply, or public Bodies of Water.

### Supplier Responsibility Standards

- 1. Regulatory Permits** Supplier shall comply with **Stormwater** permitting and reporting requirements per applicable regulations.
- 2. Directly Responsible Individual(s)** Supplier shall identify a specific individual or individuals within the facility who will be responsible for the development, implementation, revision, monitoring, and inspecting, in accordance with the requirements of the **Stormwater Management Plan**, and emergency response.

### 3. Identification of Pollutant Sources

- 3.1 Potential Pollutant Sources** Supplier shall identify potential pollutant sources that might affect Stormwater runoff. Supplier shall prepare the following to identify pollutant sources:

- A list of areas of **Industrial Activities** exposed to Stormwater and its **Pollutant Constituents**
- A list and description of potential spills and leaks that could contribute pollutants to Stormwater discharge, and specify which outlets are likely to be affected
- A list and description of past spills and leaks in the previous 3 years that occurred at areas exposed to Stormwater, or that drained to the Stormwater drainage system
- A list of **Non-Stormwater Discharges** and eliminate any **Unauthorized Non-Stormwater Discharges**

**3.2 Facility Map** Supplier shall prepare a facility map that includes the following information:

- Outlines of Stormwater drainage areas within the facility, portions of the drainage area affected by run-on from surrounding areas, and direction of flow of each drainage area, on-site Bodies of Water, and areas of soil erosion
- Location of nearby **Bodies of Water** and municipal storm drain inlets where the facility's Stormwater discharges and **Authorized Non Stormwater Discharges** may be received
- Location of Stormwater collection and conveyance systems, associated points of discharge, and direction of flow, including any Structural Control measures that affect Stormwater discharges, authorized Non Stormwater Discharges, and runoff
- Outline of all impervious areas of the facility, including paved areas, buildings, covered storage areas, and other roofed structures
- Locations where materials are exposed to precipitation and locations where significant spills or leaks have occurred
- Locations of areas of Industrial Activities that are potential pollutant sources.

**4. Control of Stormwater Discharge** Supplier shall select effective **Structural controls** or **Non-structural Controls** to prevent Stormwater pollution. Supplier shall conduct surveys at least annually to identify any direct connections from industrial production areas into a Stormwater drainage system. Supplier shall conduct the survey after any Alteration likely to affect the connections. If there are such connections, Supplier shall remove them immediately. Supplier shall manage wastes generated from Stormwater control systems in accordance with all applicable regulations.

**5. Evaluation and Monitoring of Stormwater Discharge** Supplier shall conduct periodic monitoring of its Stormwater discharges per applicable regulations. Supplier shall monitor Stormwater discharges to evaluate the effectiveness of control measures at the facility to minimize or eliminate pollutants from Stormwater runoff.

**5.1 Assessments of Discharges** Any abnormalities, observed during these evaluations shall lead to further facility inspections, root cause analysis, and implementation of corrective actions and countermeasures as appropriate to eliminate potential for Stormwater discharges.

**5.2 Indicator Sampling** Supplier shall collect Stormwater discharge samples from a facility's discharge points for laboratory analyses. The sampling frequency shall be no less than once every 6 months, and based on the potential risk level for Stormwater contamination. Chemical parameters for laboratory analyses shall be dependent on the types of pollutant sources identified (as per Identification of Pollutant Sources) and include at a minimum pH, chemical oxygen demand, colour, oil, and grease. Results shall be compared with the allowable pollutant concentration limit for the receiving Body of Water. If local requirements are not available for a pollutant, the thresholds specified in the Basketdrop Wastewater Discharge Quality Standards table (located in the Wastewater Management Standard) shall be used. If concentration exceeds limits, Stormwater pollution control measures shall be evaluated and fixed.

**5.3 Compliance Sampling** If Supplier is governed by local and/or national discharge limitation guidelines sampling shall be required to determine compliance with those limits. If effluent limits are exceeded, the Supplier shall conduct corrective actions and conduct additional sampling to show compliance. Supplier shall conduct one comprehensive annual evaluation of its Stormwater control measures that includes the following:

- Visual observations and inspection of sampling/analytical data
- A summary of inspections specified in the Stormwater Management Plan
- Incident reports and corrective action tracking results

**6. Emergency Response** Supplier shall ensure that there is at least one employee responsible for coordinating all facility Stormwater-related emergency response and reporting activities. Supplier shall have a system in place that can immediately close a Stormwater drain outlet discharging outside the facility boundary if there is a Hazardous substance spill released to the

Stormwater drainage system. Supplier shall have the necessary plans and procedures to notify internal management and local regulatory agencies and take immediate steps to fix a Hazardous substance spill that has reached outside the facility boundary. Supplier shall conduct an analysis to determine the cause of the emergency release incident and implement corrective actions.

## Air Emissions Management

**Supplier Code of Conduct Requirements** Supplier shall identify, manage, reduce, and responsibly control Air Emissions emanating from its operations that pose a hazard to the environment. Supplier shall conduct routine monitoring of the performance of its Air Emission control systems.

### **Supplier Responsibility Standards**

**1. Regulatory Permits** Supplier shall have all required environmental approvals and permits for its current operations. Supplier shall plan and provide adequate time to update current environmental approvals and permits for any **Alteration** that may change the environmental impact of Supplier's operations.

**2. Directly Responsible Individual(s)** Supplier shall identify a specific individual or individuals within each facility who will be responsible for all aspects of Air emissions management, including maintenance and inspection of Air Emissions-control devices, monitoring and reduction of Air Emissions, and emergency response.

**3. Identification of Air Emission Sources** Supplier shall identify Air Emissions sources, including those from industrial activities, auxiliary devices, Dormitories and canteen areas. Examples of processes that contribute to Air Emissions and corresponding air pollutants are identified in the table Examples of Typical Processes and Air Pollutants. Air Emissions are any regulated polluting substance introduced directly or indirectly into the ambient air by the Supplier's facility that are likely to have harmful effects on human health and/or the environment as a whole. Air Emissions include but are not limited to **Volatile Organic Compounds**, nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), **Suspended Particulate Matter**, and **Greenhouse Gas**. These pollutants can damage property and vegetation, and cause serious health problems in humans and animals. In addition, air pollutants include toxic air contaminants, such as acids, hexavalent chromium, and ammonia, which have direct and indirect effects on human health. Toxic air contaminants can lead to cancer and other chronic and acute ailments.

Examples of Typical Processes and Air Pollutants	
Processes	Air Pollutants
Cutting/drilling	Dust/particulates
Surface treatment	Acid/alkaline fog and <b>Hazardous Air Pollutants</b>
Etching	Ammonia, acid fog, and hazardous air pollutants
Electroplating/anodizing	Acid fog, particulates, and hazardous air pollutants
HVAC and refrigeration systems	GHGs (covered in Greenhouse gas emissions management)
Welding/grinding/polishing	Dust, particulates, and fumes
Painting and coating	VOCs, acid mists, aerosols, and particulates
Boiler/generator operations	Sulfur dioxide, nitrous oxide, and particulate matter/ dust, carbon monoxide, and GHG (CO2) (GHG covered in Greenhouse gas emissions management)
Incinerating/burning	Sulfur dioxide, nitrous oxide, particulate matter/dust, dioxins and other hazardous air pollutants, carbon monoxide, and GHG (CO2) (GHG covered in Greenhouse gas emissions management)

Supplier shall develop and maintain an Air Emissions source inventory:

- The inventory shall include the composition and Mass Rate of emissions for each Air Emissions source
- Supplier shall revise the inventory after any changes to the production or process that are likely to affect Air Emissions
- Supplier shall review the inventory annually
- Supplier shall maintain the inventory in electronic form and make it available for review by Basketdrop upon its request.

Examples of Typical Processes and Air Emissions Control Devices	
Processes	Air Emissions Control Devices
Cutting/drilling/polishing	Cyclone/baghouse dust collector (Not applicable for combustible dusts.)
Surface treatment	Wet scrubber (alkaline/acid solution)
Etching	Wet scrubber (alkaline/acid solution)
Electroplating	Wet scrubber (alkaline solution)
Painting and coating	Wet scrubber (alkaline solution) and/or activated carbon filter
Boiler/generator operations	Wet scrubber (alkaline solution)

4.

**Control of Regulated Air Emissions** Supplier shall report and/or register Air Emissions sources in accordance with Applicable Laws and Regulations. Supplier shall install and maintain appropriate Air Emissions-control devices for Regulated Air Emissions, and all control plans must be approved or accepted by all applicable regulatory agencies. Examples of processes and relevant Air Emissions-control devices are identified in the Examples of Typical Processes and Air Emissions Control Devices table. Supplier shall report Air Emissions discharge points to each applicable regulatory agency. The Air Emissions discharge points shall also be reported to Basketdrop for audit purposes and updated once a year to reflect any changes in discharge points during the previous year. Supplier shall handle, store, and dispose of residues and/or Wastes generated from Air Emissions control devices in accordance with Applicable Laws and Regulations and as per the Basketdrop Hazardous Waste Management Standard.

## Greenhouse Gas Emissions Management

**Supplier Code of Conduct Requirements** Supplier shall identify, manage, reduce, and responsibly control Greenhouse Gas (GHG) emissions from its operations. Supplier shall regularly quantify, set targets, monitor progress, and reduce its emissions of greenhouse gases through process modification, abatement, energy conservation, use of clean energy, or other measures

### Supplier Responsibility Standards

**1. Regulatory Compliance and Permits** Where applicable, Supplier shall comply with relevant laws and regulations pertaining to GHG emissions, such as any emission limits/caps, trading schemes, or reduction mandates. Examples include:

- Reporting and/or registering GHG emissions inventory as required by local or national authorities
- Controlling GHG emissions below any regulated emission levels
- Retaining copies of permits and data related to GHG emissions.

**2. Directly Responsible Individual(s)** Supplier shall identify a specific individual or individuals within each facility who will be responsible for all aspects of GHG emission management, including development of an annual GHG emission inventory and reduction

targets, reporting of GHG emission inventories, monitoring and reduction of emissions, and compliance of national and local emission regulations.

**3. GHG Emission Inventory** Supplier shall identify GHG emissions sources, including those from industrial activities, auxiliary devices, Dormitories, and canteen areas. Examples of GHG emission sources are identified in the table *Examples of GHG Emission Sources*.

Examples of GHG Emission Sources*			
Scope	Emission Sources	Activities	Example End Uses
1	Stationary Combustion	Combustion of fossil fuels for generation of electricity and heat	boilers, furnaces, turbines
	Mobile Combustion	Combustion of fossil fuels for transportation	trucks, ships, airplanes, buses, and cars
	Fugitive Emissions	Intentional or unintentional releases (e.g., leaks and refrigerant usages)	refrigeration and air conditioning equipment
	Process Emissions	Manufacturing or process of chemicals and materials	aluminum smelting, semiconductor fabrication
2	Purchased Electricity	Consumption of electricity	electric ovens, motors, mechanical compression, heating, welding, lighting
	Purchased Heating & Cooling	Consumption of steam, hot water, heat, and cooling that are purchased from a 3rd party	process heating and cooling
3	Purchased Products & Materials	GHG emitted in the production of the purchased products and materials	purchased machineries, parts, materials, and furniture
	Employee Commutes & Travels	Employee commuting to and from work and business travels	cars, airplanes, buses, and trains
	Transportation & Distribution	Outsourced transportation of purchased goods and finished products	trucks, ships, airplanes, buses, and cars
	Waste Disposal	Process of wastes generated in operations	waste processing, recycling

Supplier shall develop and maintain an annual GHG emission inventory:

- The annual GHG emission inventory shall be developed according to the **Greenhouse Gas Protocol** or equivalent standards and shall include **Scope 1 Emissions and Scope 2 Emissions**.
- Supplier shall update the inventory annually.
- Where applicable, Supplier shall update custom emissions factors.
- Supplier shall maintain the inventory in electronic form and make it available for review by Basketdrop upon request.

**4. Monitoring and Reporting of GHG Emissions** Supplier shall develop a program or have a solution to quantify and monitor GHG emissions, including data collection and updating emission calculations for each of the emission sources identified in the GHG emission inventory. Supplier shall annually report Basketdrop-related GHG emissions to Basketdrop.

**5. Emissions Reduction Targets and Monitoring Progress** Supplier shall annually review its GHG emission inventory and set targets to reduce GHG emissions through process modification, abatement, energy conservation, clean energy, or other measures. Supplier shall set targets for absolute reduction, intensity-based reduction, or both. Examples of intensity-based reductions include reduction normalized to production output and economic output. Supplier shall monitor progress of meeting the emission reduction targets and document the results of the reduction measures. Supplier shall report emission reduction progress, with supporting documentation (as applicable) in electronic form, to Basketdrop for quarterly review, and upon its request

**6. Documentation** All primary data used to calculate GHG emissions, such as energy consumption data, and documentation shall be made available to Basketdrop for review upon its request. Required documents to be retained include but are not limited to:

- GHG emission inventories
- Licenses, permits, records of corrective actions and other regulatory registration documents (where applicable). Supplier shall retain documents for the previous 3 years or per applicable regulations, whichever is longer.

More broadly we will be looking to align with the principles of the ISO14001 Environmental Management Systems standard and will review operations against the standard to identify any compliance gaps. We will continue to work with procurement to understand how to better embed environmental sustainability in procurement processes and contract terms and conditions; and ensure that our own suppliers are able to demonstrate their commitment to achieving net zero by 2050.



## Declaration and Sign Off

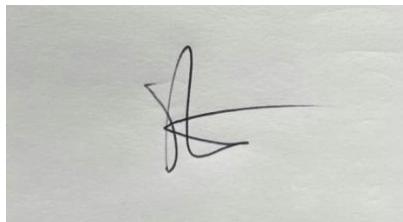
This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard<sup>1</sup> and uses the appropriate Government emission conversion factors for greenhouse gas company reporting<sup>2</sup>.

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard<sup>3</sup>.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

### Signed on behalf of the Supplier:



Slydon Lungu, Director & Chief Executive Officer

Date: .....14/03/2023.....

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<sup>1</sup><https://ghgprotocol.org/corporate-standard>

<sup>2</sup><https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

<sup>3</sup><https://ghgprotocol.org/standards/scope-3-standard>