



**ORGANISATIONAL  
CARBON FOOTPRINT**

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**Verification Report**

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**Entain plc**

**Σntain**

01/02/2024

## Executive Summary

This project covers the verification of the emissions from anthropogenic sources of greenhouse gases, included within the organisation's boundary and meeting the requirements set out in ISO 14064-3: *Specification with guidance for the validation and verification of greenhouse gas assertions*.

- Organisational boundary: Global Operations
- Control approach: Operational control
- Reporting period: 01/01/2022 - 31/12/2022
- GHG sources included:
  - Scope 3: Category 1, 4, 5, 6 (spend based), 7

Based on the work we have undertaken, and the evidence provided by Entain plc, nothing has come to our attention that leads us to believe that the organisation's footprint has not been properly prepared, in all material respects. This is in accordance with the criteria defined in the GHG Protocol.

The total verified scope 3 footprint was 346,051 tCO<sub>2</sub>e. The breakdown by scope is:

- Category 1: Purchased goods and services (EEIO methodology) – 312,603 tCO<sub>2</sub>e
- Category 1: Purchased goods and services (Supplier specific) – 15,726 tCO<sub>2</sub>e
- Category 4: Upstream transportation and distribution – 7,874 tCO<sub>2</sub>e
- Category 5: Waste – 101 tCO<sub>2</sub>e
- Category 6: Business travel (spend based) – 5,292 tCO<sub>2</sub>e
- Category 7: Employee commuting – 4,456 tCO<sub>2</sub>e

Please note: Entain also has activity data based Category 6: Business travel emissions. These have been verified as part of a different project for the reporting year 2022. Please see 'Entain - Verification Statement' and 'Entain - Verification Report' dated 21<sup>st</sup> July 2023.

During this project, the verification team identified several different recommendations that Entain plc should act upon. More details about these can be found under the Conclusions section of this report.



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## Project Summary

Project name	Verification ISO 14064-3 (2 years)
Client	Entain plc
Reporting criteria	GHG Protocol
Verification criteria	ISO 14064-3 : 2019 – Specification with guidance for the verification and validation of greenhouse gas statements
Verification period	01/01/2022 - 31/12/2022
Level of assurance	Limited assurance
Communication channel	Sustainability Report
Organisational boundary	Global Operations
Control approach	Operational control
Operational boundary	<p>Scope 3</p> <ul style="list-style-type: none"> <li>Category 1: Purchased Goods and Services</li> <li>Category 4: Upstream Transport and Distribution</li> <li>Category 5: Waste Generated in Operations</li> <li>Category 6: Business Travel (spend based)</li> <li>Category 7: Employee Commuting</li> </ul>

Excluded emissions (if applicable)	None
Materiality	1% per emission source, 5% aggregate

## Project Team

### Verification team

Lead Auditor	Sarah Jardine
Auditor(s)	James Mulryan, Delyth Jones, Tom Lawton
Peer Reviewer	Charlotte Kirkman and Chloe Tremlett-Williams

### Client's team

Main Contact	Dean Reed
Other team members	Michael Coles, Zain Sajid

## Footprint Analysis

The total scope 3 carbon footprint of Entain plc’s operations from 01/01/2022 - 31/12/2022 amounted to 346,051 tCO<sub>2</sub>e. This footprint includes the following:

- Scope 3: Category 1, 4, 5, 6 (spend based), 7

### Footprint breakdown

The graphs below show how the organisation’s scope 3 footprint is broken down by category.

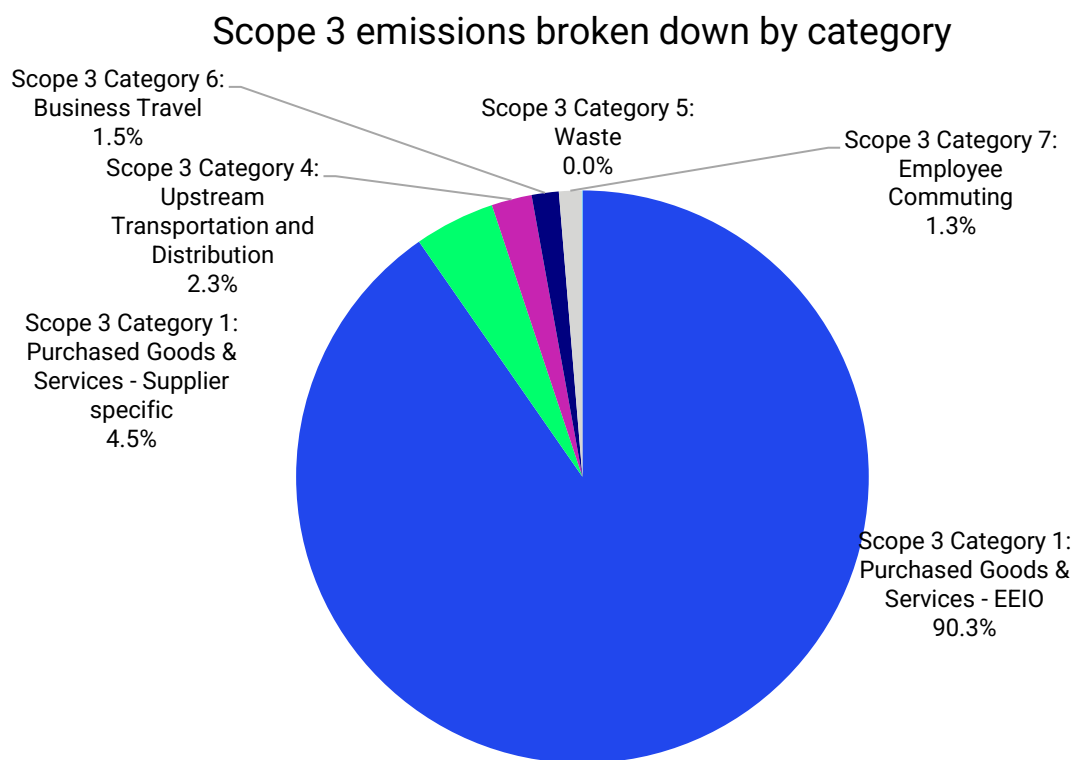


Figure 1. Total footprint broken down by scope 3 category.

The largest category of scope 3 emissions for Entain plc is category 1: purchased goods and services. This category constitutes 95% of the scope 3 emissions calculated. Two calculation methodologies are used with the majority of emissions being calculated using EEIO emissions factors (90%), while some suppliers use supplier specific information to calculate emissions (5%).

## Data quality analysis

An important step to calculate a verifiable footprint, is the access to data of good quality, preferably deriving from primary sources. Table 1 presents the data source, for each source of emissions.

**Table 1. Data quality evaluation by emissions source**

Scope & Source	Data Source	Data Quality
<b>Scope 3</b>		
Category 1 – EEIO	Invoices input into procurement system	Adequate quality data
Category 1 – Supplier specific	Invoices input into procurement system Supplier's annual reports	Adequate quality data
Category 4	Invoices input into procurement system	Adequate quality data
Category 5	Waste transfer notes inputted by supplier into dataset that is sent to client	Good quality data
Category 6	Invoices input into procurement system	Adequate quality data
Category 7	HR system and annual report for total FTE figures	Adequate quality data

## Site Visit

Location	Virtual
Address	N/A
Date	06/12/2023, 14/12/2023, 19/12/2023
Auditor(s)	Sarah Jardine, James Mulryan, Delyth Jones, Tom Lawton
Client members interviewed	Michael Coles, Zain Sajid, Sheena Bhamber, Joanne Maidlow

### Summary of the site visit

The site visit took place via three teams calls.

The first related to the overall footprint, the second was with a Entain's contact at Greenzone, their waste management provider. The third focussed on the spend based calculations and was with a member of Entain's finance team

#### 6th December 2023

Our interview was with Michael (MC) and Zain (ZS). Micheal is part of the procurement team, with ESG responsibilities encompassing part of his role. Zain is part of the sustainability team, and he has oversight of the waste collection and employee commuting emissions calculation and data collection.

We started out the interview with MC to discuss the spend data, relating to category 1, 4 & 6 calculations. The spend data is compiled on a platform controlled by the finance team. This data is exported to a Power BI dashboard that is used by the procurement team to extract data. The Power BI dashboard is updated monthly using an automated process. MC extracts the full extract from this dashboard and then creates a pivot table to consolidate the taxonomy and supplier combinations. MC then removes the non-relevant taxonomies at level 1, removing non relevant activities such as tax. MC then allocates EEIO factors to the relevant taxonomies using a matrix created during previous advisory work by Carbon Trust. I was noted that the matching process and matrix should be updated to account for changes in activity since it was created. New spend taxonomies are added to the matching matrix and allocated a relevant EEIO factor.

MC conducts checks to ensure the total spend being used in the calculations matches the annual spend in the Power BI dashboard (minus the non-relevant categories). No checks are conducted on YoY changes to specific categories but acknowledged that this may improve the non-conformity checks going forward. It was also flagged by CT that Entain needed to update the

spend in their footprint following a review showing not all spend had been included for FY22 when the extract was made in April, due to late invoices. It was suggested that a check should be carried out against the Power BI dashboard when footprinting is being conducted around August/September to ensure all spend is captured.

Next, we discussed the supplier specific spend calculation which uses certain suppliers carbon inventories to calculate emissions. MC outlined how the top 100 spend vendors are reviewed and they check if any major vendors report the emissions on CDP. The type of company is considered as this approach is only suitable for homogeneous companies that have a narrow scope of activities. MC outlined how Amazon was excluded due to the wide variety of activities not being appropriate for the calculations. They also review whether the scope of emissions included is complete enough and that companies will not be selected if they exclude major relevant categories. They are also currently exploring partnerships with data services providers who may be able to provide improved supplier specific emissions data for their spend calculations. They are also thinking about improving their business travel calculation by using a supplier who can provide distance data.

Entain works with a third party called Greenzone for their waste processing. ZS described the relationship with Greenzone and walked us through their online dashboard/portal which is used to confirm the tonnage of waste of downloads and reports from the site. Greenzone use 400 subcontractors to cover most of Entain's sites, with the exception of Monmore stadium which is operated by the local council with its waste and data processed separately. ZS mentioned they are hoping to use the dashboard functionality on a monthly basis, to monitor the waste consumption of sites. It was noted there were some discrepancies with the footprint and download values, so after the virtual interview ZS scheduled an additional call with Joanne Maidlow from Greenzone answer our queries and explain the differences. Joanne had reviewed the discrepancies and realised there was an omission and some sites which are no longer in the boundary had incorrectly been removed in the prior years, this was amended.

Finally, we discussed Category 7, currently Entain are aware their calculation is based on high level assumptions and plan to collect primary data using an employee survey for future footprints. ZS explained the methodology and assumptions used in the current employee commuting calculation, including the additional uplift of FTE which includes the employees which have worked for Entain in the year and reflected in their annual reports but have not been captured in the breakdown by region.

#### 14th December 2023 - Waste interview

During the call, we went over the process of waste collection and how it is recorded on the Greenzone portal. The minor discrepancies between the data downloaded and the data on the portal were discussed. This was due to the fact that the data on the portal is in tonnes, whereas the data collected and logged is in kilograms, leading to small rounding errors.

#### 19th December 2023 - Finance interview

The second interview was with Michael (MC) and Sheena Bhamber (SB), Head of Finance transformation at Entain. SB provided us with a detailed walkthrough of Entain's P2P (purchasing) oracle process flow. The discussion covered various aspects of the process, including supplier onboarding, requisitioning, purchase orders, invoicing, and payment. Additionally, we talked about Entain's approval and review process, which is based on band levels. Each approval is assigned a band level, which links to the level of sign-off required.

## Materiality Assessment

The verification team created a sampling plan in order to provide limited assurance for the verification. This sampling plan was based on a Risk Assessment, which evaluated each emissions source against its contribution to the footprint, the quality of the data, the data collection and monitoring processes, as well as their effectiveness.

As seen in Figure 1 above, category 1: purchased goods and services is the largest contributor to the total scope 3 footprint, constituting 95%.

**Table 2. Risk Assessment**

Emissions Source	Value (tCO <sub>2</sub> e)	% of total footprint	Risk: High, Medium, Low
Category 1: Purchased Goods and Services (EEIO)	312,602.50	90.3%	HIGH – Any errors in data collection and aggregation could lead to a material misstatement
Category 1: Purchased Goods and Services (Supplier specific)	15,726.13	4.5%	MEDIUM – misstatement will not impact materiality
Category 4: Upstream Transportation and Distribution	7,873.65	2.3%	MEDIUM - misstatement will not impact materiality
Category 5: Waste	100.59	0.03%	LOW - misstatement will not impact the footprint in a material way
Category 6: Business Travel	5,292.15	1.5%	MEDIUM - misstatement will not impact materiality
Category 7: Commuting	4,456.07	1.3%	MEDIUM - misstatement will not impact materiality

The sampling plan is shown in the table below.

**Table 3. Emissions included in the sampling**

Scope	Category	Emissions source(s)
Scope 3	Purchased Good & Services	All data sampled
Scope 3	Upstream Transportation	All data sampled
Scope 3	Waste	All data sampled
Scope 3	Business Travel (Spend based)	All data sampled
Scope 3	Employee Commuting	All data sampled

### EEIO Sampling – further notes

Spend is categorised by spend category (level 1-3). Based on the most granular spend categorisation, these spend lines are assigned an emission factor. The square root of spend level 2 categories were sampled. A mix of high, medium and low material categories were chosen, focus was placed on the most material and any the assessment team wanted to look into further.

Entain then provided 'drilldowns' of the requested spend line, each drilldown was made up of multiple invoice spends. The final level of sampling was done to choose invoices, a mix of high, medium and low invoices were requested as well as one or two negative spend lines, depending on materiality. The drilldown totals were checked, invoice values were checked, and category descriptions were sense checked from invoices.

The initial sampling plan was adjusted by adding further drill down requests due to a change in data provided by client for category 1, 4 and 6.

## Non-conformities log

This section provides the details of all non-conformities that have been raised and closed during the verification process.

Non-conformities have been logged in accordance to two types of classification. The type of non-conformity:

- **Correction Action Requests (CAR)** when we have identified an issue with your data or analysis that needs action on your part to be corrected.
- **Clarification Requests (CL)** when we need further information to evaluate the correctness/completeness of your data and calculation.
- **Opportunity for Improvement (OFI)** when we identify an opportunity for you to improve your data collection processes or calculation, despite the fact that the one currently in play is not materially at risk of misstatement or incorrect.

And the severity of the non-conformity:

- **Minor non-conformities** are expected to have a small impact in the results of the footprint (<1% impact)
- **Major non-conformities** are expected to have a significant impact in the results of the footprint (>1% impact). All of these issues should be resolved by the end of the Verification Process

## Clarification requests log

### Corrective Action (CAR)

Reference	Scope	Emission source	Reference file	Finding	Severity	Clarification/Action taken	Status	Date opened	Date closed
CAR 0.1	Cat 1b	Google spend	FY22 CAT.1b - Turnover	The Google spend in the turnover tab calculation does not match the google spend in the FY22 Cat 1b tab	Major	Amended by Entain	Closed	08/11/2023	23/11/2023
CAR 0.2	Cat 1b	Meta (Facebook) spend	FY22 CAT.1b - Turnover	Inconsistent EEIO factors used for Meta/Facebook in the Turnover tab vs the spend file calculation, yielding different result. Recommend index matching the emissions factors used from spend file, and inserting a True/False check to ensure the emissions in turnover tab match those in the Cat1b tab.  This should be done for all companies in turnover methodology, we have not conducted checks on all yet so may be relevant others	Major	Amended by Entain	Closed	08/11/2023	23/11/2023
CAR 0.3	Cat1b	Utilities	FY21 & FY22 CAT.1b	Please remove any spend that has been included in the scope 1&2 calculation to avoid double counting	Major	Amended by Entain	Closed	08/11/2023	23/11/2023
CAR 0.4	Category 7	Employee commuting	N/A	Please add category 7: employee commuting calculation into the footprint model	Major	Amended by Entain	Closed	08/11/2023	23/11/2023



<b>CAR 0.5</b>	Category 5	Waste	FY21 & FY22 Waste Data	Please include references for the emission factors used, including source, date and description	<b>Major</b>	Added in the updated Footprint sheet	<b>Closed</b>	10/11/2023	21/12/2023
<b>CAR 0.6</b>	Category 5	Waste	FY21 & FY22 Waste Data	Incorrect unit stated for the emission factor, need to state KgCO2e per (unit)	<b>Minor</b>	Was done to maintain the consistency. Explained in the footprint sheet.	<b>Closed</b>	10/11/2023	21/12/2023
<b>CAR 0.7</b>	Category 4	Upstream T&D	FY21 & FY22 CAT.4	Please include references for the emission factors and currency conversion used, including sources, dates and descriptions	<b>Major</b>	Hovering over cell K1 provides the FX conversion. This is the average FX rate for the year via Google. Emissions factors come from the '...EEIO' tabs  Screenshot reference added to both Cat4 tabs	<b>Closed</b>	15/11/2023	21/12/2023
<b>CAR 0.8</b>	Category 6	Business Travel	FY21 & FY22 CAT.6	Travel emissions are being underestimated as the EEIO factor used is 'Travel arrangement and reservation services' throughout. This only accounts for the auxiliary services of the booking company, not the actual travel.  'Air Transportation Services' should be used for air travel and 'Transit and ground passenger transportation services' for other forms of travel.  If types of business travel cannot be separated, suggest developing an assumption on the split of air travel and applying that to spend	<b>Major</b>	Updates have been made incl. weighted averages for unknown travel and appropriate emissions factors	<b>Closed</b>	20/11/2023	21/12/2023



<b>CAR 0.9</b>	Cat 1b	Google spend	FY22 CAT.1b - Turnover	<p>The spend based emissions for Snap, Oracle, Apple &amp; DLA Piper do not match in the FY22 Cat1b - Turnover tab vs the FY22 Cat1b tab. This means the turnover methodology is not calculating the correct savings for these entities, impacting the calculation</p> <p>Please correct these so there is a consistent spend based emissions calculated in the two tabs</p>	<b>Major</b>	<p>Snap = updated Oracle = updated (note: final calculation unknown due to scope details not shared -&gt; Cat 1b spend data used) Apple = updated DLA = updated (note: final calculation unknown due to scope details not shared -&gt; Cat 1b spend data used)</p> <p>Therefore, the '...Final' tab has been updated due to updated figures</p>	<b>Closed</b>	23/11/2023	30/11/2023
<b>CAR 1.0</b>	Cat 1b	Landlord	FY22 & FY21 CAT.1b	<p>Some spend lines in Cat1b have the level 3 category 'Landlord'. Are these properties that Entain lease? Emissions from these would already be included in S1&amp;2 I believe, so emissions should not be calculated for these lines if that is correct</p>	<b>Major</b>	<p>These have been moved to the '...NA' tabs for not applicable for Scope 3 calculations</p>	<b>Closed</b>	23/11/2023	21/12/2023
<b>CAR 1.1</b>	Cat 7	Employee commuting		<p>Please can you include this cat in the consolidated footprint ,the summary emissions sheet and total scope 3 emissions</p>	<b>Major</b>	<p>Added in the updated Footprint sheet</p>	<b>Closed</b>	13/12/2023	21/12/2023
<b>CAR 1.2</b>	Cat 1b	Apple spend	FY22 & FY21 CAT.1b	<p>Recommended action for this year removing downstream emissions from Apple's turnover based approach (emissions should be only scope 1,2 &amp; Cat1-8 of scope 3). In future years apply this to all turnover based suppliers where possible.</p> <p>Due to immaterial impact is not required, but will be an OFI for next year to improve methodology</p>	<b>Minor</b>	<p>Noted - this will be a FY23 Scope 3 action - not changes in FY21 and FY22 due to immaterial as mentioned</p>	<b>Closed</b>	14/12/2023	21/12/2023

### Clarification Requests (CL)

Reference	Scope	Emissions source	Reference file	Finding	Severity	Clarification/Action taken	Status	Date opened	Date closed
CL 0.1	Cat1b	All	FY21 & FY22 CAT.1b	Please confirm whether you have excluded internal spending (including between Entain brands) from the calculations?	Major	Correct, excluded from calculations – for transparency these appear in the 'FY21 – NA' and 'FY22 – NA' tabs where you can see the 'intercompany' level as I didn't want to delete lines	Closed	06/11/2023	06/11/2023
CL 0.2	Cat1b	All	FY21 & FY22 CAT.1b	Could you send us the mapping table used so we can review the appropriateness of the emission factors? Has this been updated or reviewed since the 2020 footprint?	Major	attached and saved to project site	Closed	06/11/2023	06/11/2023
CL 0.3	Cat1b	Utilities	FY21 & FY22 CAT.1b	I noticed quite a few lines attributed to Level 2 - Utilities and Level 3 – blank/electricity/gas. Are these lines covered by the consumption data used in Scope 1&2? And therefore should be removed? 8th Nov update - CAR 0.7 added to address this	Major	This was called out by Dean on our side, and I assume yes from the work Colin undertook earlier this/last year on Scope 1&2	Closed	06/11/2023	06/11/2023
CL 0.4	Cat1b	All	FY21 & FY22 CAT.1b	How was the average non-produce services EF calculated for each year? Could you provide the calculation? OFI 0.3 added to address this	Minor	This was taken from, for example, in tab 'FY21 EEIO' and line 10 > 'average – non-product services = 0.3337'	Closed	06/11/2023	06/11/2023
CL 0.5	Category 5	Waste	FY21 & FY22	Please can you describe how data gets inputted into the Annual Emissions Master File?	Minor	Portal shows us the exact weight in tonnes and that is copied to the emissions file. This process is	Closed	10/11/2023	21/12/2023



			Waste Data			explained in detail during the online site visit.			
CL 0.6	Category 5	Waste	FY21 & FY22 Waste Data	Are the Greenzone time periods financial years or calendar years?	Major	Confirmed in the interview/site visit Greenzone data is broken down monthly in the system the reason for the calendar year in the waste tab was for spot checks.	Closed	10/11/2023	06/12/2023
CL 0.7	Category 5	Waste	FY21 & FY22 Waste Data	Please can you provide the reasoning for calculating the average EF for the office rather than using a specific EF?	Minor	It is based on an assumption. Reason Explained in the footprint sheet.	Closed	10/11/2023	21/12/2023
CL 0.8	Category 5	Waste	FY21 & FY22 Waste Data	Do you have a breakdown of what is recycled vs landfilled?	Minor	Detailed breakdown provided in the updated footprint.	Closed	10/11/2023	21/12/2023
CL 0.9	Category 5	Waste	FY21 & FY22 Waste Data	Please can you provide reasoning behind the 19% increase in waste tonnage?	Minor	Increase due to rebound after covid lockdowns	Closed	10/11/2023	13/12/2023
CL 1.0	Category 5	Waste	FY21 & FY22 Waste Data	Please can you provide a description of where the hardcoded figures are taken from? For example all hard coded consumption data, emission factors and 60.64 for Offices in F15	Major	<p><b>Waste Generation Data:</b> The waste generation data (hardcoded figures) utilized in our calculations is sourced from the online portal of "Greenzone." Greenzone collaborates with over 400 waste management contractors. Approximately 80% of these contractors share precise waste generation figures for each site, while the remaining 20% utilize industry averages. We rely on Greenzone's monthly updates to capture the latest and most accurate waste generation values for our footprint calculations.</p> <p><b>Emission Factors:</b> The emission factors employed in our calculations are sourced from DEFRA BEIS for the years 2021 and 2022. These factors are industry-standard and provide a</p>	Closed	10/11/2023	21/12/2023



						reliable basis for assessing environmental impact.			
						<p><b>Office Waste Values:</b> The values associated with office waste are derived from assumptions based on the 2021 data. Given the unavailability of 2022 office waste data from our landlords, we extrapolated from the 2021 figures, assuming that the waste generation ratio remains consistent. This approach ensures continuity in our calculations and provides a reasonable estimate for the 2022 office waste impact. This is why F15 is also a hardcoded value. All these factors are also explained in the updated footprint file.</p>			
CL 1.1	Category 5	Waste	FY21 & FY22 Waste Data	With Monmore Stadium, does ND mean no available quantity data or no waste reported? It currently only has food waste for 2022	Major	More detail to be provided - provided by email	Closed	10/11/2023	01/12/2023
CL 1.2	Category 4	Upstream T&D	FY21 & FY22 CAT.4	Please can you confirm if all transportation was truck based? With no smaller delivery vehicles, trains or shipping	Major	Assumed to be truck, as no further granularity available and truck is the most carbon intensive	Closed	15/11/2023	16/11/2023
CL 1.3	Category 4	Upstream T&D	FY21 & FY22 CAT.4	Please can you confirm all spend is in GBP, as three different countries are listed	Major	All spend is converted to GBP in Entain's internal systems	Closed	15/11/2023	16/11/2023
CL 1.4	Category 6	Business Travel	FY21 & FY22 CAT.6	Please can you confirm that business travel spend (USD) increase of 188% between FY21 and FY22 is reflective of activity	Major	Increase due to rebound after covid lockdowns	Closed	15/11/2023	16/11/2023
CL 1.5	Category 6	Business Travel	FY21 CAT.6	Why is Click Travel Ltd listed with no spend?	Minor	Spend under a certain amount 50p can be listed as zero	Closed	15/11/2023	16/11/2023



CL 1.6	Category 6	Business Travel	FY21 & FY22 CAT.6	How do you decide if Level 3 in column D is Travel or Car Hire, is it based on the Vendor or on what is selected in the input?	Major	The vender is categorised when it is first set up on the system	Closed	15/11/2023	16/11/2023
CL 1.7	Category 1b	PG&S	FY21 & FY22 Cat1b	Can you explain or provide any files illustrating how you match EEIO emissions factors to spend lines in the FY21 & FY22 Cat1b tabs of the model? Is this done manually, or do you use a mapping table to allocate emissions factors? Since the 'Taxonomy EEIO mapping' file is a pivot table of the FY21 Cat1b tab, it shows us what emissions factors you've used rather than how you've allocated them in the first place if that makes sense	Major	They're added manually using the lowest level of taxonomy (level 3 or level 4). The original mapping was done by the Carbon Trust when performing the original analysis for our FY20's dataset in mid-2021. I've followed the same principles, and best assumptions, and in the interim we've updated our taxonomy so the mapping is updated.  Attached with the tabs 'original...' for the original shared datasets, with the 'refresh...' being the latest tabs that reflects my latest submission last week since the £ values changed and taxonomy was updated.	Closed	20/11/2023	06/11/2023
CL 1.8	Category 5	Waste	FY21 & FY22 Waste Data and Monmore stadium	Please can you provide some context for where the note for the average tonnage came from, is it an email? The note itself doesn't mention a time period, but does mention type of waste is this in addition to the food waste tonnage quoted in the footprint?	major	Yes, the Momore data is based on an email we received from the local waste contractor. The email does not specifically mention the yearly breakdown, rather it gives annual average (2021 & 2022) values with the types of waste collected by the contractor. These calculations have been added to actual footprint sheet. Our actual headcount keeps changing throughout the year as the business keeps on acquiring new businesses and also have numerous mergers. Hence the headcount from actual emissions data sheet was not up to date. That difference has also been adjusted.	Closed	23/11/2023	21/12/2023
CL 1.9	Category 7	Employee commuting	Entain Category 7 - Commute - 16.11	Please can you explain the reasoning behind the additional emissions in AA11 and AB11, is the headcount breakdown not able to capture all staff?	Minor		Closed	23/11/2023	01/12/2023



<b>CL 2.0</b>	Category 7	Employee commuting	Entain Category 7 - Commute - 01.12	Please can you explain the difference between the rail EF used for UK and other countries? UK BEIS 0.03549 and 0.04 for all other regions.	<b>Major</b>	Not all the countries have the emission factors available. That is why we used the highest of the UK factor to calculate the emissions in all other countries. Explained during the meeting on 14/12/2023	<b>Closed</b>	13/12/2023	21/12/2023
<b>CL 2.1</b>	Category 5	Waste	FY21 & FY22 Waste Data and Monmore stadium	Following on from CL1.9 w.r.t Monmore Stadium, I have spotted a 4 weekly collection of offensive waste within the WTN for Crayford, why is this not captured in the footprint but the food waste is?	<b>Minor</b>	This looks like a manual error where the wrong stadium had been labelled back in 2019. The updated one for Monmore is just food waste, and Crayford has offensive waste. The updates WTNs have resolved this issue.	<b>Closed</b>	21/12/2023	21/12/2023

**Opportunity for Improvement (OFI)**

Reference	Scope	Emission source	Reference file	Finding	Severity	Clarification/Action taken	Status	Date opened	Date closed
<b>OFI 0.1</b>	Cat 1b	All	Turnover based spend	The 'emissions factor' e.g. K5, is not what we would traditionally call an emissions factor (kgco2e/unit). It's more of a % of Google's emissions that you are attributing to yourself (which is fine). Recommend renaming to 'Attribution factor' throughout for clarity	<b>Minor</b>	Updated	<b>Closed</b>	08/11/2023	21/12/23
<b>OFI 0.2</b>	Cat 1b	All	Dashboard (22 and 21)	Please pull the EEIO and supplier specific calculated emissions through separately to the sub category table on dashboard tabs	<b>Minor</b>	CT have updated the emissions factors	<b>Closed</b>	08/11/2023	21/12/23



<b>OFI 0.3</b>	Cat 1b	All	Average - non product services	An Entain specific emission factor should be calculated (calculating a weighted average EF from assigned EEIOs). This will improve the accuracy of the calculation	Minor	Noted for in the future and FY23	Closed	15/11/2023	21/12 /2023
<b>OFI 0.4</b>	Category 4	Upstream T&D	FY21 & FY22 CAT.4	There is opportunity to use country specific emission factors as you have the granularity of region of spend	Minor	Noted	Closed	15/11/2023	21/12 /2023
<b>OFI 0.5</b>	Category 6	Business Travel	FY21 & FY22 CAT.6	There is opportunity to use country specific emission factors as you have the granularity of region of spend	Minor	Noted. As per CAR 1.6 this will be reflected in our FY23 Scope 3 footprint. Not updated in FY21 and FY22 due to immateriality	Suspended	15/11/2023	N/A
<b>OFI 0.6</b>	Cat 1b	Turnover calculation	Turnover based spend	When calculating turnover based intensities, you should only include the companies Scope 1, 2 and upstream scope 3 emissions (category 1-8). This is because including downstream Scope 3 will incur double counting e.g. Apple account for the electricity use of their sold devices in downstream Scope 3, but you are already accounting for charging devices bought in Scope 2. We use upstream Scope 3 as that gives the emissions associated with providing the goods/services to you, and what happens after that should not be considered in category 1	Major	Added in the updated footprint file.	Closed	13/12/2023	21/12 /2023
<b>OFI 0.7</b>	Cat 7	Employee commuting	Entain Category 7 - Commute - 01.12	To increase transparency of the calculation, assumptions and emission factors used the methodology text box should be visible for both years	Minor	The Index formula has been used by CT is help on this. Post update, cells in the Turnover tabs were copy/pasted over so everything is updated appropriately	Closed	13/12/2023	25/12 /2023



<b>OFI 0.8</b>	all	Emission factors	All	Linking the specific emission factor cell in the category calculation will ensure the EF is the most updated figure. Hard coding the EF in the calc increases chance of errors and reduces visibility of the EF information which is captured in the EF reference tab (including source, emission factor description and year)	<b>Major</b>	Noted by Entain	<b>Suspended</b>	21/12/2023	N/A
<b>OFI 0.9</b>	Cat 1b	Apple spend	FY22 & FY21 CAT.1b	Recommended action for next year removing downstream emissions from turnover based approach (emissions should be only Scope 1,2 & Cat1-8 of Scope 3). In future years apply this to all turnover based suppliers where possible.	<b>Major</b>	To be addressed in future footprints	<b>Suspended</b>	02/01/2024	N/A
<b>OFI 1.0</b>	Category 5	Waste		Engage with the local council to increase visibility on the waste produced by Monmore stadium.	<b>Major</b>	To be addressed in future footprints	<b>Suspended</b>	02/01/2024	N/A
<b>OFI 1.1</b>	Category 5	Waste		Ensure all sites are accounted for, including sites which have moved or ceased operations between the time of the activity and waste management report being run.	<b>Major</b>	To be addressed in future footprints	<b>Suspended</b>	02/01/2024	N/A
<b>OFI 1.2</b>	Category 7	Employee commuting		Confirm FTE figure for the financial year. Remove discrepancy between region of geography FTE total and the published FTE annual report figure for both FY21/22.	<b>Major</b>	To be addressed in future footprints	<b>Suspended</b>	02/01/2024	N/A
<b>OFI 1.3</b>	Category 7	Employee commuting		Gather primary data for distance, transportation mode and frequency of employee commuting.	<b>Minor</b>	To be addressed in future footprints	<b>Suspended</b>	02/01/2024	N/A



OFI 1.4	Category 7	Employee commuting	The calculation does not need to be split out by each geographic region when being multiplied by the same emission factor, number of days, distance travelled assumptions, split of transport modes and emission factors. However, it is noted the calculation will change in future years.	Minor	To be addressed in future footprints	Suspended	02/01/2024	N/A
OFI 1.5	Reducing hardcoded figures		Hard coded figures used in the calculation increases chance of errors and reduces visibility. It is recommended to link through figures from tabs which show the detailed backend calculations and linking cells ensures the most updated values are being referenced.	Minor	To be addressed in future footprints	Suspended	02/01/2024	N/A
OFI 1.6	Summary dashboard tab		Inclusion of a summary tab which links through the total from each scope 3 category tab. This will provide a breakdown of the emissions from each source and enable the user to see the proportion each category has on the overall footprint.	Minor	Updated	Closed	08/11/2023	21/12/23
OFI 1.7	Cat 1b	FY22 & FY21 CAT.1b	Entain should look to assess their spend on rent to determine whether a small proportion should be accounted for as admin/management fees in Scope 3 Cat1b	Minor	To be actioned in future footprints	suspended	15/01/2024	N/A



<b>OFI 1.8</b>	Cat 1b turnover		FY22 & FY21 CAT.1b	Entain should look to implement a framework to assess which suppliers are suitable for the turnover methodology.	<b>Major</b>	To be actioned in future footprints	suspended	15/01/2024	N/A
<b>OFI 1.9</b>	3	Cat 4	Dashboard (22 and 21)	The spend based calculation used for category 4: Upstream Transportation and Distribution should be adjusted to allow for the price of fuel in the country in which the fuel is consumed. Entain should therefore look to collect Category 4 data split by country in following years.	<b>Minor</b>	To be addressed in next year's footprint	<b>Suspended</b>	15/1/2023	N/A
<b>OFI 2.0</b>	3	Cat 4	Dashboard (22 and 21)	It is recommended that Entain evaluates the possibility of allocating a certain proportion of spend on physical goods to Category 4. This would cover the transportation of goods from the supplier to Entain's site. Entain could engage with their key goods suppliers to obtain reasonable cost allocation between the goods and their delivery.	<b>Minor</b>	To be addressed in next year's footprint	<b>Suspended</b>	15/1/2023	N/A
<b>OFI 2.1</b>	Cat 5	Waste	Waste	Entain should review their waste data from Greenzone to ensure all data is captured in footprint. The raw data and WTN should tie up to the totals pulled from the Greenzone portal.	<b>Minor</b>	To be addressed in next year's footprint	<b>Suspended</b>	15/1/2023	N/A



<b>OFI 2.2</b>	Cat 1b	FY22 & FY21 CAT.1b	Entain should review all spend assigned to the waste management procurement category currently accounted for in 1b, to ensure no double counting been spend based and quantity based calculations.	<b>Minor</b>	To be addressed in next year's footprint	<b>Suspended</b>	15/1/2023	N/A
<b>OFI 2.3</b>	Cat1b	FY22 & FY21 CAT.1b	Spend assigned to the EEIO factor: Water, sewage and other systems, should be allocated to Category 5: Waste generated in operations	<b>Minor</b>	To be addressed in next year's footprint	<b>Suspended</b>	15/1/2023	N/A

## Conclusions

Based on the work undertaken and the evidence provided by Entain plc, it was confirmed with Limited Assurance that nothing has come to our attention that leads us to believe that the organisation's CO<sub>2</sub>e emissions have not been properly prepared, in all material respects, in accordance with the criteria defined in the GHG Protocol.

- Scope 3: 346,051 tCO<sub>2</sub>e
  - Category 1: Purchased goods and services (EEIO methodology) – 312,603 tCO<sub>2</sub>e
  - Category 1: Purchased goods and services (Supplier specific) – 15,726 tCO<sub>2</sub>e
  - Category 4: Upstream transportation and distribution – 7,874 tCO<sub>2</sub>e
  - Category 5: Waste generated in operations – 101 tCO<sub>2</sub>e
  - Category 6: Business travel (spend based) – 5,292 tCO<sub>2</sub>e
  - Category 7: Employee commuting – 4,456 tCO<sub>2</sub>e

Please ensure that, when communicating your verification, the categories that are included within the boundary are specified.

As mentioned in the Opportunities for Improvement section above, our verification activities have highlighted that there could be potential omissions from Category 5: Waste Generated in Operations. Although these omissions may not be material to the overall scope 3 footprint, they could be significant to the category. Therefore, Entain shouldn't look to communicate or make decisions based on the Category 5: Waste Generated in operations data separate to the rest of the verified Scope 3 footprint.

## Recommendations

The following recommendations have been identified from the suspended Clarification Requests listed above. These should be acted upon and/or resolved by the time of the next GHG emissions verification audit.

Reference	Scope	Recommendation
<b>R1</b>	Purchased Goods & Services	It is recommended to review each procurement category, starting with the most material, to gain a greater understanding of what's being accounted for and refine the emission factors being applied.
<b>R2</b>	Purchased Goods & Services	For vendors for which the turnover-based approach to footprinting is used, seek to only include upstream scope 3 emissions (categories 1-8) where possible in future years to increase accuracy.
<b>R3</b>	Purchased Goods & Services	Revise the supplier emissions factor matrix to ensure the most appropriate EEIO factor is allocated to the vendor category. Specific vendor names may also be incorporated to

		the matrix, where the category allocation is not representative of the activity being performed by the vendor.
<b>R4</b>	Business Travel	Aim to increase the coverage of travel suppliers for which actual distance data is used.
<b>R5</b>	Business Travel	Many spend lines do not specify the transport type, which leads to the application of an average factor. Entain should focus on improving the granularity of the spend codes to enable the allocation of mode-specific business travel emission factors.
<b>R6</b>	Waste	Engage with the local council to increase visibility on the waste produced by Monmore stadium.
<b>R7</b>	Waste	Entain should review their waste data from Greenzone to ensure all data is captured in footprint. They should check that all sites are accounted for, including sites which have moved or ceased operations between the time of the activity and waste management report being run.
<b>R8</b>	Employee commuting	Aim to gather primary data for distance, transportation mode and frequency of employee commuting.
<b>R9</b>	Reducing hardcoding	Hard coding figures used in the calculation increases chance of errors and reduces visibility. It is recommended to link through figures from tabs which show the detailed backend calculations and linking cells ensures the most updated values are being referenced.
<b>R10</b>	Summary Dashboard tab	Inclusion of a summary tab which links through the total from each scope 3 category tab and includes category 3 and category 6 (distance based).  This will provide a breakdown of the emissions from each source and enable the user to see the proportion each category has on the overall footprint.
<b>R11</b>	Category 4	The spend based calculation used for category 4: Upstream Transportation and Distribution should be adjusted to allow for the price of fuel in the country in which the fuel is consumed.



<b>R12</b>	Category 4	Entain should consider allocating whether a proportion of spend on physical goods (Category 1b) should be allocated to Cat 4 for transport of these goods from supplier to their sites.
<b>R13</b>	Employee commuting	In future years, ensure the most appropriate emissions factor is used for the mode of transport, country specific data and including all CO2e relevant gases. In addition, please use consistent decimal places for all factors referenced.