

THALES NEDERLAND B.V. CO₂-MANAGEMENT PLAN

Update 2024

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CHANGE LOG

Revision sheet

Revision	Date	Modifications
V2	2024-05-07	First version in English
V3	2024-06-11	Updated with actual data

Known shortcomings

Shortcoming	ECN	Apply in revision

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1. INTRODUCTION

1.1 CO₂ PERFORMANCE LADDER (CO₂ PRESTATIELADDER)

Thales Nederland B.V. supplies (directly and indirectly) products and services to clients who may use award advantages in tenders based on the CO₂ Performance Ladder. For Thales Nederland B.V. these clients are mainly the Dutch Department of Defense and ProRail. ProRail is the original founder of the CO₂ Performance Ladder. Nowadays the CO₂ Performance Ladder is owned and managed by SKAO (“Stichting Klimaatvriendelijk Aanbesteden en Ondernemen”, in English: Climate-friendly Procurement and Entrepreneurship Foundation). With the CO₂ Performance Ladder, suppliers are challenged and encouraged to identify and reduce their own CO₂ emissions. The more a company makes efforts to reduce CO₂, the greater the chance of being awarded a contract.

The CO₂ Performance Ladder has four angles:

A. Insight

Drawing up an undisputed CO₂ footprint in accordance with the ISO 14064-1 standard and thus gaining insight into the company's CO₂ emissions.

B. CO₂ reduction

The company's ambition to reduce CO₂ emissions.

C. Transparency

The way in which a company communicates internally and externally about its CO₂ footprint and reduction objectives.

D. Participation in initiatives

(in sector or chain) to reduce CO₂

Each angle is divided into five levels. The higher the level per angle, the more points the company collects and the more award advantages the company receives. A recognized certification body assesses the activities and determines the level of the CO₂ Performance Ladder. To achieve this, steps must have been taken at all angles of the ladder.

This document discusses the emissions inventory of Thales Nederland B.V.. This document focuses on angle A (insight) and angle B (CO₂ reduction) of the CO₂ Performance Ladder. The CO₂ footprint provides an inventory of the total amount of greenhouse gases emitted: the GHG emissions. In addition, it provides insight into the origin of these emissions with a division into direct and indirect GHG emissions (scope 1 and scope 2 respectively).

The inventory is a justification of requirement 3.A.1 of the CO₂ Performance Ladder and was carried out in accordance with ISO 14064-1: 2012 (E) “Quantification and reporting of greenhouse gas emissions and removals.” In this document the CO₂ footprint is reported in accordance with § 7.3.1 of this standard. A cross table is included for this purpose in the last chapter.

In the reporting for the CO₂ Performance Ladder, a distinction is made between scope 1, 2 and 3. This classification originally comes from the GHG protocol. The SKAO places 'business travel' and 'personal cars for business travel' in scope 2 instead of scope 3. Because this document is for the SKAO CO₂ performance ladder, the scope 1 and scope 2 categories of the SKAO are used .

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1.2 READING GUIDE

This document serves as proof of the requirements of the CO₂ Performance Ladder. A requirement is discussed per chapter. Below is a reading guide.

Section		CO2 Performance Ladder requirement
2	Organisation Description	3.A.1
3	Emission-Inventory Report	3.A.1
4	Energy management action program	2.C.2, 3.B.2 and 4.A.2
5	Control cycle	2.C.2
6	Communication plan	2.C.3

Table 1-1: Reading Guide

1.3 REFERENCE DOCUMENTS

Ref.	Document title
[1]	Thales NL website: https://www.thalesgroup.com/en/countries/europe/netherlands
[2]	Annual HSE Communication Calendar
[3]	
[4]	

Table 1-2: Reference Documents

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2. ORGANISATION DESCRIPTION

This section contains a short description of the organisation. For more detailed organisation, a reference is made to the organisation's website: <https://www.thalesgroup.com/en/countries/europe/netherlands> [1]

Thales Nederland B.V. is an internationally operating high tech company, which is specialized in the design, manufacturing and servicing of defense and security products and solutions.

2.1 POLICY STATEMENT

Thales Nederland B.V. has an extensive HSE policy statement (available on request) and a dedicated Environment Social Governance (ESG) Program. One of the pillars of the ESG program is the Low Carbon strategy as initiated by the Thales Group, of which Thales Nederland B.V. makes part of.

2.2 STATEMENT COMPANY SIZE

The total CO₂ emission of Thales Nederland B.V. in 2023 is 3034 ton CO₂. Of this, 857 tons of CO₂ can be attributed to offices and 2177 tons of CO₂ to projects. Thales Nederland B.V. falls under the 'Works/deliveries' category and is a medium-sized company with these CO₂ emissions.

	Services	Works/deliveries
Small company	Total CO ₂ emissions amount to a maximum of (≤) 500 tons per year.	Total CO ₂ emissions from offices and business premises amount to a maximum of (≤) 500 tons per year, and total CO ₂ emissions from all construction sites and production locations amount to a maximum of (≤) 2,000 tons per year.
Medium company	Total CO ₂ emissions amount to a maximum of (≤) 2,500 tons per year.	Total CO ₂ emissions from offices and business premises amount to a maximum of (≤) 2,500 tons per year, and total CO ₂ emissions from all construction sites and production locations amount to a maximum of (≤) 10,000 tons per year.
Large Company	Total CO ₂ emissions amount more than (>) 2,500 tons per year.	Total CO ₂ emissions from offices and industrial premises amount to more than (>) 2,500 tons per year, and total CO ₂ emissions from all construction sites and production locations amount to more than (>) 10,000 tons per year.

Table 1-1: Classification into small, medium or large company according to CO₂ Performance Ladder Handbook 3.1.

2.3 PROJECTS WITH AWARD ADVANTAGE

In 2023 there were no running projects with award advantage.

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3. EMISSION INVENTORY REPORT

3.1 RESPONSIBLE PERSON

The person responsible for the CO₂ reduction control cycle as well as all activities linked to it, such as achieving the objectives, is Debbie Brands, HSE director Thales Nederland B.V.

3.2 BASE YEAR AND REPORTING

This report concerns the year 2023; the year 2018 serves as the reference year for the CO₂ reduction targets. This reference year has been changed in 2021 to align the new objectives with the CO₂ ambitions of the Thales Group.

3.3 SCOPE

Thales Nederland B.V. is part of the Thales Group. This file concerns Thales Nederland B.V. with premises in Delft, Eindhoven, Hengelo and Huizen. All other companies within the Thales Group are excluded, because of insufficient financial and operational control.

3.4 DIRECT AND IN-DIRECT GHG EMISSIONS

3.4.1 Calculated GHG emissions

Scope 1	usage	unit	emission factor	tonnes CO ₂	%
Natural gas	302.640	m ³	2079	629	21%
Fleet (Lease) - Diesel	27.359	liters	3256	89	3%
Fleet (Lease) - Petrol	112.354	liters	2821	317	10%
fuel consumption of assets (diesel)	1.770	liters	3256	6	0%
refrigerants	22	kg	divers	111	4%
Total scope 1				1.152	38%

Scope 2	usage	unit	emission factor	tonnes CO ₂	%
Electricity - grey	-	kWh	456	-	0%
Electricity - green	13.989.198	kWh	0	0	0%
electricity fleet - grey	196.226	kWh	456	89	3%
electricity fleet - green	6.580	kWh	0	-	0%
residual heat without additional heating	2.484	GJ	8800	22	1%
Total scope 2				111	4%

Scope 3 Business travel	usage	unit	emission factor	tonnes CO ₂	%
Fleet (Rental) - fuel unknown	180.422	km's	193	35	1%
Fleet (Rental) - hybrid/petrol	856.146	km's	144	123	4%
Fleet (Rental) - electricity	29.731	km's	109	3	0%
Fleet (Rental) - diesel	27.822	km's	180	5	0%
Business kilometers private car	971.843	km's	193	188	6%
Business kilometers public transport	368.132	km's	2	0,7	0%
Air travel < 700	595.140	km's	234	139	5%
Air travel 700-2500	2.086.519	km's	172	359	12%
Air travel >2500	5.846.715	km's	157	918	30%
Total business travel				1.771	58%

Total scope 1,2 en business travel 2023	3.034
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3.4.2 Scope 3

2023	Activity within category	Size in CO ₂ (tonnes)	
Upstream Scope 3 Emissions			
1.	<i>Purchased goods and services</i>	<i>electronics</i>	94.435
4.	<i>Upstream transport en distribution</i>	<i>transport</i>	<i>not available</i>
5.	<i>Production waste</i>	<i>waste</i>	304
7.	<i>Commuting</i>	<i>commuting</i>	2.286
Downstream Scope 3 Emissions			
9.	<i>Downstream transport en distribution</i>	<i>transport</i>	<i>not available</i>
11.	<i>Use of sold products</i>		<i>not available</i>

3.4.3 Combustion of biomass

In the year of this reporting, no biomass combustion took place at Thales Nederland B.V.

3.4.4 GHG-removals

No greenhouse gas removal or compensation took place in the year of this reporting at Thales Nederland B.V.

3.4.5 Exceptions

There are no notable exceptions to the GHG Protocol.

3.4.6 Influential people

Within Thales Nederland B.V., no individual persons can be identified who have such an influence on the CO₂ footprint that a change in the behaviour of this individual person alone would cause a significant change in the CO₂ footprint.

3.4.7 Future

The emissions in the paragraphs above have been determined for the year 2023. It is expected that these emissions will not change significantly in the coming year. However, given Thales' objectives, CO₂ emissions will decrease in the coming years.

3.4.8 Significant changes

As described in section 3.2, 2018 is the base year. The method used to determine air travel was adjusted in 2019. This has led to a recalculation of the emissions inventory for the years 2014-2018. It has been established that this has led to an adjustment in the determined CO₂ emissions per year of plus or minus 1%, which is not significant. The recalculated emissions are used to determine the progress of the reduction in CO₂ emissions. This is described in the CO₂ Reduction Plan document.

In 2020, the Delft branch switched from calculation based on energy consumption to determine energy consumption. m² surface area according to determined gas and electricity consumption. This shows that natural gas consumption in the past was greatly overestimated.

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In 2022, the Eindhoven branch did not have a power contract based on Green energy generated in the Netherlands. The power consumed has therefore been assessed as 'grey', which represents a significant change compared to previous years.

In 2023, the carve-out of the Ground Transportation Systems (GTS) activities as conducted in 2022, had its impact on the 2023 CO₂ footprint mainly in scope 1 (gas consumption and business travel).

3.5 QUANTIFICATION METHODS

The Thales Group eHSE reporting tool and a model tailor-made for Thales were used to quantify CO₂ emissions. All consumptions can be entered in both models. The quantification of CO₂ emissions is based as much as possible on registered volume units of the fuels used. The conversion from volume to emission values is unambiguous and provides the most reliable comparison.

In those situations where fuel volume units were not available, the most reliable information available was used. In the case of business travel by private car or public transport and air travel, kilometres travelled are taken into account.

3.6 EMISSION FACTORS

For the inventory of CO₂ emissions for the year 2023, the emission factors from CO₂emissionfactors.nl were used according to the January 2023 version.

3.7 UNCERTAINTIES

The results presented should be seen as the best estimate of the actual values. Almost all data used to calculate the CO₂ footprint is based on invoices and/or actual measured quantities. This means that the margin of uncertainty is very small. There are still some uncertainties. These are described below:

1. Gas and Electricity; This data was not available for the locations Delft (until 2020), Ridderkerk, Lekstraat and Westland – the buildings are rented. A standard consumption per m2 has been assumed for gas and electricity. This is included for all years. Because it is not certain whether this concerns green electricity or gray electricity, we assumed gray electricity for Lekstraat and Westland. As of 2023 the locations Ridderkerk, Lekstraat and Westland are no longer part of the organizational boundary of Thales Nederland BV.
2. A number of cars in the fleet are (re)charged with electricity. When this is done via the fuel card, the charged kWh are registered. If this is done in any other way, no. In addition, it is unknown what the origin of all charged kWh is. Because it is not demonstrable, this amount of electricity is considered gray electricity.
3. The employees of Thales Nederland B.V. use the plane a lot and often. There is a registration of total kilometers traveled by air, but this is based on the place names and not on the actual locations of the airports, which means that the registered kilometers may differ slightly from reality.
4. Thales Netherlands employees often use private cars for business trips. The declared kilometers may differ from reality..

The uncertainty margin was estimated using a ghg-uncertainty.xlsx tool from www. GHGprotocol.org. The result is a calculated deviation of less than 2%, with a high degree of accuracy.

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3.8 EXEMPTIONS

In Handbook 3.1, reporting of the CO₂ emissions inventory on all greenhouse gases, expressed in CO₂ equivalents, is not yet mandatory. It is therefore not required to include other gases, other than CO₂ (CH₄, N₂O, HFCs, PFCs and SF₆) that are released during the company's operations, in the emissions inventory. This also applies to refrigerants. However, the emissions released by the use of refrigerants at Thales Nederland B.V. are so significant that they are included in the CO₂ Footprint.

3.9 VERIFICATION

The emission inventory of Thales Nederland B.V., has only been internally verified.

3.10 REPORTING ACCORDING ISO 14064-1

This document has been drawn up in accordance with the requirements of ISO 14064-1, paragraph 7. Table 2 contains a cross-table of the parts of ISO 14064-1 and the sections in the document.

ISO-14064-1	§ 7.3 GHG-report content	Description	Section document
A	A	Reporting organization	2
B	B	Person responsible	3.1
C	C	Reporting period	3.2
D, E	D	Organizational boundaries	3.3
F	E	Direct GHG emissions	3.4
G	F	Combustion of biomass	3.4
H	G	GHG removals	3.4
I	H	Exclusion of sources or sinks	3.4
J	I	Indirect GHG emissions	3.4
K	J	Base year	3.2
L	K	Changes or recalculatons	3.4
M, T	L	Methodologies	3.5
N	M	Changes to methodologies	3.6
O	N	Emission or removal factors used	3.6
P, Q	O	Uncertainties	3.7
R	P	Statement in accordance with ISO 14064-1	3.10
S	Q	Verification	3.9

Table 1-1: Cross table ISO 14064-1

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4. ENERGYMANAGEMENT ACTION PROGRAM

This section details the quality management plan (requirement 4.A.2) and the energy management action plan (requirement 3.B.2) at Thales Nederland B.V.

4.1 QUALITY MANAGEMENT PLAN

The quality management plan is about assuring and improving the quality of the CO₂ footprint and Scope 3 emissions. The general objective of the quality management plan is to ensure continuous improvement of efficient and effective use of energy and a reduction of CO₂ emissions from business activities.

In addition, the quality management plan provides insight into the procedures, measuring and reporting of the CO₂ footprint. The quality plan ensures that a complete, reliable and up-to-date consolidation of Thales Nederland B.V.'s energy performance can take place. Insight is provided into the energy performance of the entire business operation and the total CO₂ emissions resulting from it. With the quality management plan as a means, Thales Nederland aims to assure and improve the quality of the data in the organization and to improve performance.

4.2 ENERGY MANAGEMENT PLAN

The NEN-EN-ISO 50001 serves as a guideline for setting up the Energy Management action plan. The introduction of an energy management system ensures that a complete, reliable and up-to-date consolidation of Thales' energy performance can take place. The core of the energy and quality management plan is continuous evaluation of the activities and identified deviations to realize improvements and is therefore drawn up in accordance with the Plan-Do-Check-Act cycle as included in NEN-EN-ISO 50001.

4.3 ENERGY POLICY

In addition to turnover and profit growth, personnel policy, safety, welfare and the environment are also essential for Thales Nederland B.V.

The responsibilities in the areas of safety, health and the environment therefore form an integral part of Thales Nederland B.V.'s business operations.

The importance of sustainability is an important factor nowadays. In order to deal with this continuously, CO₂-conscious business operations are strived for, from which we can continuously improve our emission reduction policy and increase employee awareness of the emissions that need to be reduced from our activities. Our energy policy is aimed at using our machines and other assets as optimally as possible so that we can do our work with the lowest possible energy consumption. Lower energy consumption cuts both ways: lower energy consumption is good for the environment because of lower CO₂ emissions. In addition, optimal use of company resources results in lower operating costs.

In addition to this energy policy, there is also an objective to reduce the energy consumption of processes and activities by taking reduction measures.

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4.4 OBJECTIVES

Based on the results for the period 2018-2023 and the expectations for the upcoming years, new CO₂ reduction targets have been set up to and including 2030:

CO₂ objective Thales Nederland

Thales Netherlands wants to emit 74% less CO₂ in 2030 compared to 2018 in scope 2 and business travel

Further specified for scope 1 and 2, the objectives are as follows:

Scope 1: 94% reduction in 2030 compared to 2018

Scope 2 and business travel: 52% reduction in 2030 compared to 2018

4.5 EXECUTION

4.5.1 Energy aspects

The first step is to gain insight into the energy consumers of the organization and the chain in which the company is active. Based on this insight, it can be determined in which aspects results can be achieved in reducing CO₂ emissions. This insight has been incorporated into the various reports. Periodically (once every 6 months) this list is assessed and tested for timeliness of the actual energy flows.

4.5.2 Reference year

From the start of the introduction of the CO₂ management system at Thales Nederland B.V., 2014 was chosen as the reference year. Because the CO₂ ambitions of the Thales Group has been aligned from 2022, 2018 is the new reference year, making a direct comparison with all Thales companies possible.

The CO₂ emissions have been carried out in accordance with the provisions of this document. Reliability is checked by an internal audit. Based on the identified opportunities, it is determined which components are eligible for formulating objectives. The management ultimately determines the objective.

4.5.3 Reduction objectives

The overall reduction target is formulated until 2040 in line with the Thales Group Low Carbon strategy (net zero in 2040). Annual measures are formulated based on this established overall reduction target. Both are recorded in the annual reduction plan. This plan identifies the measures that will be taken to achieve the objective and which departments are responsible for realizing the measures. This overview of measures to be taken and responsible departments is stated in the annual reduction plan.

4.5.4 Energy consumption Thales Nederland B.V.

Twice a year (every 6 months) Thales Nederland B.V. monitors its energy consumption in the context of CO₂ emission. This inventory is carried out in accordance with ISO 14064-1, the GHG protocol for scope 1 and 2 and any requirements from the CO₂ Performance Ladder. It is also assessed whether the organizational boundary is still current.

The HSE managers are responsible for carrying out the inventory, assisted by other department, e.g. HR and Travel Management. A data sheet is used for the inventory, which includes the conversion factors. The substantiation of the data in the data sheet is collected in the CO₂ repository on the network. After the

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inventory for the period in question has taken place, the external consultant carries out a quality check on the data and processes it in the Thales CO₂ Footprint sheet and report.

4.5.5 Energy reduction opportunities

Anyone within Thales Nederland B.V. can submit ideas for energy/CO₂ reduction via email and/or informal consultation. These energy/CO₂ reduction opportunities are discussed in the corresponding CO₂ working group and assessed for effectiveness. If it appears that they are possibly effective, they are added to the in the list of energy reduction opportunities.

4.5.6 Monitoring and control

Twice a year, progress on the reduction target and the measures derived from the annual plan are determined and reported to the CO₂ management system responsible person.

This reporting includes at least:

- An overview of energy consumption and CO₂ emissions per scope
- A comparison of energy consumption compared to the reference year
- An analysis of notable increases and decreases in consumption and/or CO₂ emissions
- The progress and forecast for achieving the reduction target and any recommendations for preventive or corrective measures
- The status of previous preventive or corrective actions

Based on this report, the CO₂ management system responsible person decides whether adjustment of the objectives and/or adjustment of the annual plan is necessary.

4.6 CO₂ MANAGEMENT SYSTEM ORGANIZATION

The management of CO₂ emission reduction within Thales Nederland B.V. is an integral part of the HSE management system. The HSE management system is described by process 9.2 manage HSE impacts of the Thales group reference system: Chorus.

This process consists of the following subprocesses:

- Determine the context and implement HSE policy
- Analyse legal, group, customer and other requirements
- Analyse HSE risks and impacts
- Manage HSE risk and impacts
- Manage HSE accidents, complaints and claims
- Monitor, measure, analyse
- Manage HSE continuous improvement plan.

These high level subprocesses are supported by Environmental Safety Rules (ESR) among others. These ESRs describe in more detail how both legal and legislation (e.g. EU directive), and external norms (e.g. ISO) are translated in daily practices.

The ESR-2353 energy management and ESR-2354 air emission management are applicable for CO₂ management.

For an effective CO₂ management system, the basic approach is to get insight in CO₂ emission scope 1 and scope 2, followed by taking appropriate CO₂ reduction measures. To get insight in CO₂ emission, data has to be collected regarding energy consumption and refrigerant consumption. All these data are also collected and reported to the Thales Group on a periodic basis in the eHSE tool Intelx. The Thales Nederland B.V. Sites & Operations HSE team collects and reports these data among others.

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After acquiring CO₂ emission insight, effective CO₂ reduction emission measures must be defined and performed. In the Thales Nederland B.V. context, CO₂ emission can be reduced by

- fossil fuel energy consumption reduction
- fossil fuel energy to renewable energy transition
- synthetic refrigerants consumption
- synthetic refrigerants to natural refrigerants transition

Sources for potential CO₂ emission reduction measures, but not limited to, are:

- “Informatieplicht energiebesparing” (Dutch law)
- “Onderzoeksplicht energiebesparing” (Dutch law)
- “SKAO maatregelenlijst” (CO₂ performance ladder)
- “Wet Werkgebonden Personen Mobiliteit” (Dutch law)
- Thales group CO₂ emission reduction policies (e.g. Travel policy)

The default process for CO₂ emission reduction measures are:

- Identification
- Analyses
- Assessment and decision making
- Implementation
- Evaluation

For fossil fuel energy consumption and refrigerants consumption regarding building and process installations the CO₂ emission reduction coordination is performed by Thales Nederland B.V. Real Estate team supported by the Thales Nederland B.V. Sites & Operations team. Periodic meetings are performed to monitor and control actual activities. Additional stakeholders are involved when needed (e.g. for non-building process installations and/or non-Thales owned buildings and/or budget acquisition for measurement implementation).

For fossil fuel energy consumption regarding mobility the CO₂ emission reduction coordination is performed by Thales Nederland B.V. working group “mobility”. These workgroup consists of:

- Costs and Benefits representatives from HR for the lease fleet and commuting travel compensation
- Travel management representative for business travel categories flights and (inter)national trains and rental cars
- Thales Nederland B.V. HSE director
- Thales Nederland B.V. HSE manager
- Thales Nederland B.V. works council representatives

Periodic meetings are performed to monitor and control actual activities. Additional stakeholders are involved when needed (e.g. for replacement physical operational activities by digital operational activities to avoid business travel and/or budget acquisition for measurement implementation).

For CO₂ emission reduction in the supply chain upstream, the overall coordination regarding the supplier CO₂ emission reduction performances is performed by the Thales Group purchasing departments. Thales Nederland B.V. purchasing department takes part in this group initiative.

Since 2023 the Carbon Border Adjustment Mechanism (CBAM) regulation is in-force. The CBAM is part of the fit for 55 package and relates to the supply chain upstream. The CBAM is an EU regulation for the correction at the limit of CO₂ emissions released during the production of six product categories (iron and steel, cement, fertilizers, aluminium, electricity and hydrogen) outside the EU. For Thales Nederland B.V., the trade compliance team will collect the applicable data and report in the Dutch CBAM portal.

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For CO₂ emission reduction in the supply chain downstream, the overall coordination regarding the CO₂ emission reduction performances for sold products is performed by the Thales Global Business Units. For Thales Nederland B.V. the applicable Global Business Units are LAS, DMS, SIX and DIS. The engineering departments (including product HSE representatives) take part in these GBU initiatives.

The communication of Thales Nederland B.V.'s CO₂ emission reduction performances (to internal and external stakeholders) is monitored and controlled in the periodic HSE communication meetings in which Thales Nederland B.V. communication team representatives and Sites and Operations HSE team representatives are involved.

Thales Nederland B.V. participates in several partnerships in order to inspire each other and seize the opportunity to jointly reduce CO₂ emissions faster. The overall coordination is performed by the Thales Nederland B.V. HSE team, and depending on the partnership other departments are involved (e.g. for representatives and budget). The default process regarding partnerships is:

- Identify
- Analyse added value
- Assessment and Decision Making
- Participate
- Evaluate

Based on the evaluation, the decision is either to continue the partnership participation or to stop the partnership participation.

For Thales Nederland B.V. the Low Carbon strategy is one of the pillars of the Environment Social Governance (ESG program). Therefore all CO₂ management system output is input for this ESG program and moreover the ESG program can be considered as a steering committee to monitor and control the Thales Nederland B.V. CO₂ emission reduction performances.

4.7 ASSURANCE OF THE QUALITY AND ENERGY MANAGEMENT ACTION PLAN

Thales Nederland B.V. has a ISO14001/ISO45001 certified HSE management system. The responsibility for this lies with the HSE director together with HSE managers. The quality and energy management action plan are located next to the HSE management system. Both plans are therefore included in the system of internal and external audits and the annual management review.

4.7.1 Internal audits

An internal audit is carried out annually. These audits are aimed at testing the effective and efficient implementation of energy policy. In addition, it aims to increase the quality of the CO₂ footprint and to gain a reliable picture of the progress of Thales' reduction targets. The internal audit focuses on the way in which the data is collected and processed. The internal auditor draws up an audit report containing the findings of the internal audit. Increased attention is paid to the following matters:

- Can the CO₂ emissions inventory be verified with at least a limited degree of certainty
- Does the inventory meet the requirements of ISO14064-1
- Were the correct data used when drawing up the CO₂ footprint (compare invoices and consumption data randomly)
- Which level of the CO₂ Performance Ladder is met
- Recommendations from the audits are included in the management assessment to improve the system

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4.7.2 External audits

Every year, Thales Nederland B.V. is examined by an external auditor to determine whether it meets the requirements of the CO₂ performance ladder for the level for which Thales Nederland B.V. is certified.

4.7.3 Management review

The management assesses the quality management and energy management system annually for suitability, appropriateness and effectiveness. A report is made of this, which serves as a quality registration. The output of the management review is an annual plan containing stated objectives and/or improvements for the new year.

4.7.4 Feedback

Based on the input from the previous phases and the evaluation report of the management review, objectives can be adjusted if necessary and follow-up actions can be taken to achieve improvements. This is necessary to promote continuous improvement of the quality and energy management system. Feedback on the results is provided both verbally and in writing to those involved. They are responsible for taking corrective/preventive measures within their own organizational unit.

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5. STEERING CYCLE

The CO₂ policy has cycles of six months, in which the following matters are inventoried:

- The data for the CO₂ footprint is collected;
- It is assessed whether the emission factors are still up to date;
- There are significant changes in the company that could have an impact on the footprint;
- It is assessed whether recalculation of emissions from previous years is necessary due to these changes;
- The progress of CO₂ reduction and achievement of the target is determined.

It is then assessed whether guidance on the objective and measures is necessary, in the form of tightening the objective when it is (too) easy to achieve, or in the form of taking additional measures when certain measures turned out to be impossible and the objective is in danger of not being achieved. This is then communicated internally and externally. In addition, the useful application of the sector or chain initiative in the past period is evaluated. A so-called PCDA cycle is shown below, showing the different phases of the CO₂ reduction policy.

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6. COMMUNICATION PLAN

This part of the document indicates when communication about the CO₂ reduction system of Thales Nederland B.V. takes place.

6.1 EXTERNAL STAKEHOLDERS

The external stakeholders are listed below. These are parties that have an interest in reducing energy and the most material CO₂ emissions. They are also potential partners to work with on CO₂ reduction. Communication to external stakeholders takes place via the Thales Nederland B.V.'s website.

External Stakeholders	Stakes
Government	Thales Nederland B.V. is an important supplier to the Dutch government, e.g. Department of Defense. The government has ambitions to purchase completely sustainably and has a climate agreement to significantly reduce CO ₂ emissions in the Netherlands. The elaboration takes place at both national and local (locations) level.
All (potential) customers	(potential) customers increasingly need products and services that are sustainable. The knowledge is still developing at most companies.
Suppliers	This category of stakeholders is responsible for a large part of the emissions that Thales Nederland B.V. has identified in its supplychains. Knowledge about the CO ₂ emissions caused by their materials and/or services differs per supplier.

Table 1-1: External stakeholder overview

6.2 INTERNAL STAKEHOLDERS

Internal stakeholders are the employees and management of Thales Nederland B.V.. These will be kept informed via news items on the intranet and HSE newsflash. Management will also be involved in the decision-making process regarding the reduction measures to be taken, the progress of the CO₂ reduction and other key issues of the CO₂ reduction policy.

6.3 PROJECTS WITH AWARD ADVANTAGE

Communication about Thales Nederland B.V.'s CO₂ policy concerns not only the policy of the company as a whole, but also the policy with regard to projects that have been accepted with an award advantage. For these projects, specific communication will be provided about the CO₂ emissions of the project as well as the objectives and progress in CO₂ reduction. This will mainly be done through the company's general communication messages. Where necessary, this is supplemented with communication through the project work consultation.

6.4 ANNUAL COMMUNICATION CALENDAR

Reference is made to the annual HSE communication calendar [2]

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6.5 WEBSITE THALES NEDERLAND B.V.

A partition has been set up on the Thales Nederland B.V. website about the company's CO₂ reduction policy. This page provides the necessary information about the CO₂ policy and the latest versions of the documents can be found.

The partition shows up-to-date information about:

- The CO₂ reduction policy;
- The CO₂ footprint;
- The CO₂ reduction targets (and their progress);
- The CO₂ reduction sub-targets (and their progress);
- The CO₂ reduction measures (and their progress);
- Actions and initiatives of which Thales Nederland B.V. is a participant or founder;
- A reference to the company page on the SKAO website.

Progress will be described by publishing the semi-annual communication messages. In order to be truly transparent about this progress, the communication messages will remain visible on the website for at least two years.

The most current versions of the documents below (can be downloaded as PDF) are also always available on this partition

- Communication message (requirement 3.C.1)
- The CO₂ Reduction Plan (requirement 3.B.1 & 3.D.1)
- The CO₂ Management Plan (requirement 2.C.3 & 3.B.2)
- CO₂ Performance Ladder Certificate

6.6 WEBSITE SKAO

The most current versions of the following documents are always available on the SKAO website:

- Active participation in initiatives (requirement 3.D.1)
- Completed list of measures
- Overview of projects with award advantage
- Most material scope 3 emissions (requirement 4.A.1_2)
- Chain analyses (requirement 4.A.1_2)
- Development project (requirement 4.D.1)
- Sector-wide CO₂ emissions reduction program (requirement 5.D.3)

On the SKAO website, each document must be a PDF with a version number, a signature of the authorizing responsible manager and the authorization date.

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7. COLOPHON

Author(s)	H. van der Vlugt
Date	11-06-2024
Version	3.0
Responsible manager	Debbie Brands, HSE director Thales Nederland B.V.

Table 1-1: Colophon

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