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# **About VCMI**

VCMI is an international initiative to drive credible, net zero-aligned participation in voluntary carbon markets. VCMI was established to help ensure that voluntary carbon markets make a significant, measurable, and positive contribution to achieving the Paris Agreement goals, while also promoting inclusive and sustainable development. The imperative of keeping global average temperature increase below 1.5 degrees Celsius requires the world to avoid, reduce, and remove as large a quantity of greenhouse gas (GHG) emissions as possible, as quickly as possible.

To help do so, VCMI coalesces stakeholders around a shared vision for high-integrity voluntary carbon markets to make a meaningful contribution to climate action while also supporting the achievement of the UN SDGs. VCMI connects with and amplifies initiatives that share this vision.

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# Disclaimer

The VCMI's Claims Code of Practice and its accompanying documents, including without limitation Annexes, Supplementary Guidance and Explanatory Notes, are designed to promote credible, net zero-aligned participation in voluntary carbon markets. They have been developed through a multistakeholder public consultation and road-testing. While VCMI encourages use of the Claims Code of Practice and its accompanying documents by all relevant organizations, any and all statements, claims and actions made or taken based fully or partially on the Code and/or its accompanying documents are the full responsibility of those engaging in them, whether or not in a way aligned with the recommendations therein. Neither VCMI, nor other individuals and organizations who contributed to the Code and/or its accompanying documents assume responsibility for any consequences or damages, legal or otherwise, resulting directly or indirectly from any use of, or as a result of relying on the Code and/or its accompanying documents, or otherwise arising in connection therewith. Organizations are recommended to take independent legal advice on their intended use of the Code and/or its accompanying documents in all relevant jurisdictions.

Where the Claims Code of Practice and/or its accompanying documents rely on guidance, standards, codes and other third-party documents, these are only non-exhaustive examples of such third-party documents and neither VCMI, nor other individuals and organizations who contributed to the Code and/or its accompanying documents assume responsibility for the accuracy of the information or processes outlined in such third-party documents, and any consequences or damages, legal or otherwise, resulting directly or indirectly from any use of, or as a result of relying on these third-party documents or their contents, or otherwise arising in connection therewith. Organizations are recommended to consult the primary sources of all guidance, standards, codes and other third-party documents referred to in the Code and its accompanying documents, make an independent evaluation of their credibility and take independent legal advice on their intended use in all relevant jurisdictions.



Executive
Summary

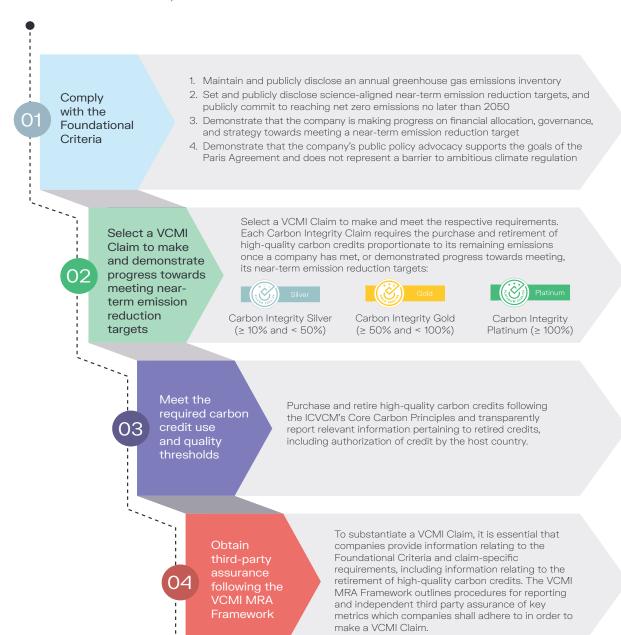


# **Executive Summary**

The Monitoring, Reporting and Assurance (MRA) Framework detailed in this document outlines the requirements and standards that bring integrity and rigor to the Voluntary Carbon Markets Integrity Initiative (VCMI) Claims Code, ensuring that for each VCMI Claim issued, underlying information is appropriately evaluated, evidenced, and verified. The MRA Framework aims to help companies navigate the VCMI Claims process and adhere to all requirements found within the VCMI Claims Code as summarized below. The framework outlines procedures for companies and assurance providers to follow to understand the specific requirements and criteria that must be adhered to in order to make a VCMI Claim.

The MRA Framework information requirements leverage several commonly used and accepted frameworks and standards, such as but not limited to, the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and the Science Based Targets initiative (SBTi) Criteria and Recommendations for Near-term Targets. A comprehensive list of these frameworks and standards is provided in Appendix E: Frameworks and standards in the MRA Framework.

# The VCMI Claims process



SECTION 1.

# Assurance requirements



# Assurance requirements

As detailed in Step 4 of the VCMI Claims Code, the MRA Framework requires independent third-party assurance of specified metrics as shown in Table 1 below, to provide integrity to the data and information submitted to make a VCMI Claim. Assurance shall be performed by an independent, accredited third-party to provide verification of data, criteria, and information. Third-party assurance is a best practice in sustainability reporting, as it provides the verification of reporting quality and integrity of the calculation methods and underlying data. Future reporting requirements and assurance levels will be continuously evaluated to align with regulatory reporting and assurance requirements as they emerge.

This MRA framework also allows companies to provide evidence of previously obtained third-party assurance for the purpose of making a VCMI Claim. This aims to ensure that a VCMI Claim places no unnecessary reporting and/or cost burden on companies wishing to make a VCMI Claim and allows the MRA Framework to be adaptable to evolving regulatory requirements and assurance standards.

# Assurance providers and standards

The International Auditing and Assurance Standards Board (IAASB), American Institute of Certified Public Accountants (AICPA) and International Organization for Standardization (ISO) are currently the most prevalent bodies of non-financial data quality assurance and, hence, the most appropriate for assuring the VCMI Claims Code Foundational Criteria. These are the recognized assurance standards to be used by independent third parties when performing assurance over specified metrics outlined in this MRA Framework, for the purposes of a company seeking to obtain a VCMI Claim. As the sustainability assurance landscape evolves, VCMI will continue to evaluate assurance requirements, providers, and standards and may amend the accepted list of assurance standards in the future.

Assurance providers are required to follow the assurance body standards outlined in Table 1 and to meet the ethics, conduct, quality, and independence requirements provided in Appendix F: Detailed Assurance Requirements.

Table 1: Assurance bodies and related standards

# Assurance Body Assurance Standards Auditing Standards Board • AT-C section 105 Concepts Common to All Attestation (ASB)/AICPA Engagements; SSAE No. 18, 19, 21 Issuers: AICPA member firms AT-C section 210 Review Engagements; SSAE No.22 The following is a link to the AICPA's website that AICPA Code of Professional companies may use to identify an assurance provider: QM 10A Firm's System of Quality Control https://us.aicpa.org/forthepublic/findacpa International Auditing and Assurance Standards Board ISAE 3000 (Revised)<sup>1</sup> (IAASB) ISAE 3410 Issuers: Assurance practitioners International Ethics Standards Board for Accountants The following is a link to the International (IESBA) Federation of Accountants website that companies may use to identify an assurance provider: International Standard on Quality Management (ISQM) 1

https://www.ifac.org/who-we-are/membership

<sup>1 &</sup>lt;u>ISSA 5000</u> (exposure draft) General Requirements for Sustainability Assurance Engagements is anticipated to be finalized in September 2024, this standard should be used in replacement of ISAE 3000 (Revised) at that time, as applicable.

# International Organization for Standardization (ISO) (applicable to GHG emission assurance ISO 14064-3 Greenhouse gases).

Issuers: Independent third-party ISO verifiers

The following is a link to the ISO's website that companies may use to identify an assurance provider:

ISO - Certification

- ISO 14064-3
- ISO 14065
- ISO 14066
- ISO Code of Ethics and Conduct

# Level of assurance

The MRA Framework outlines the disclosure and assurance requirements for each of the key metrics to make a VCMI Claim. The level of assurance required was established through feedback received from the VCMI Stakeholder Forum, Expert Advisory Group and Early Adopter companies.

Table 2 illustrates the metrics which require public disclosure and limited assurance for companies making a VCMI Claim. Limited assurance is a level of assurance attained through a review engagement, in which the review of evidence and procedures performed allows the practitioner to conclude whether a material modification should be made. Comprehensive assurance requirements are elaborated in subsequent sections for reference and definitions of assurance levels are provided in <u>Appendix F</u>.

Table 2: Current disclosure and assurance requirements

	Metric	Current requirements
FC1	Scopes 1 and 2 emissions from most recent reporting year and base year, and any base year recalculations for scopes 1 and 2	Limited assurance
FOI	Scope 3 emissions from most recent reporting year and base year and any base year recalculations for scope 3	Public disclosure
FC2	Science Based Targets initiative (SBTi) validated targets or SBTi Commitment Letter	Public disclosure
FC3	Progress in financial allocation, governance, and strategy towards meeting near-term emission reduction targets	Public disclosure
FC4	Public policy advocacy requirement	Public disclosure
Step 2	VCMI Claim selection and demonstrate progress towards meeting near-term emission reduction targets	Public disclosure
Step 3	Carbon credit use and quality thresholds	Public disclosure
Step 4	Assurance provider information	Public disclosure

Additional VCMI guidance on assurance contained within this document:

- Appendix F: Detailed assurance requirements
- Appendix G: Forthcoming regulatory assurance requirements
- Appendix H: Assurance provider guidance checklist

Assurance and claim submission timeline



# Assurance and claim submission timeline

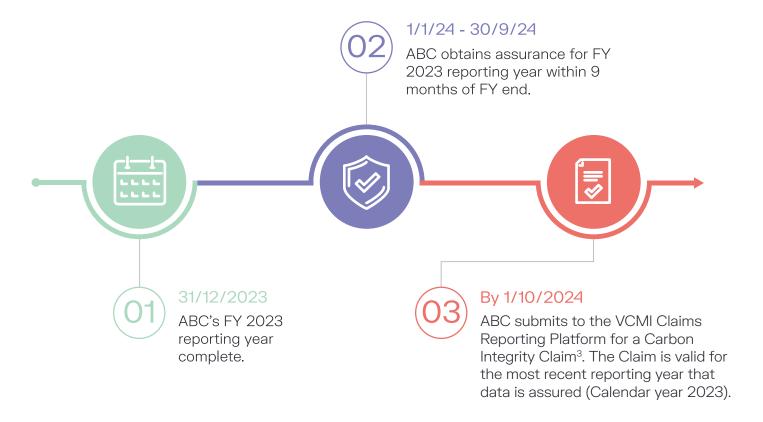
Companies shall submit VCMI Claim information, including their assurance report, within 9 months<sup>2</sup> after completion of the company's financial year reporting period. VCMI Claims are valid for a period of one year, and is directly linked to the company's financial year reporting period for which it is using to make a VCMI Claim (e.g. a company attaining a VCMI Claim in 2024 would utilize financial year 2023 data). The financial year (FY) of the claim will be reflected on the Carbon Integrity mark which companies can use after fulfilling the requirements set out in this MRA Framework. Further details on the Carbon Integrity mark and branding guidelines is provided here.

To make an annual VCMI Claim, companies shall submit the required information relating to the most recent financial year reporting period following the guidance in this MRA Framework.

Key timelines are summarized below:

Within 9 months after completion of the company's financial year reporting period, companies must obtain
assurance where necessary, and submit the required documentation to the <u>VCMI Claims Reporting Platform</u>.<sup>3</sup>

The timeline below provides an example company, ABC Company that obtains a VCMI Claim. Upon completion of ABC Company's financial year reporting period, assurance is obtained over required data. ABC Company submits required documentation to the VCMI Claims Reporting Platform and obtains a VCMI Claim for the reporting period that data was submitted.



- The 9-month timeframe is provided to ensure companies have sufficient time to accurately report and, where necessary, attain assurance over data that is required to submit for a VCMI Claim. Note that companies opting to make a VCMI Claim in 2023, and which have already passed the 9-month period following the end of their financial year 2022/23, will be allowed to make a VCMI Claim given the VCMI MRA Framework and its guidance was released in November 2023, acknowledging companies will need time to prepare to make a VCMI Claim.
- For companies that have not received Science-based Targets Initiative (SBTi) validation over their near-term targets, a 24-month period will be allowed if evidence of commitment to SBTi is provided. The 24-month period to submit a target for SBTi validation is aligned with the formal SBTi commitment process. The evidence of commitment to SBTi must be dated in advance of the date for which intent to obtain a VCMI Claim was established.

SECTION 2.

# Reporting Requirements

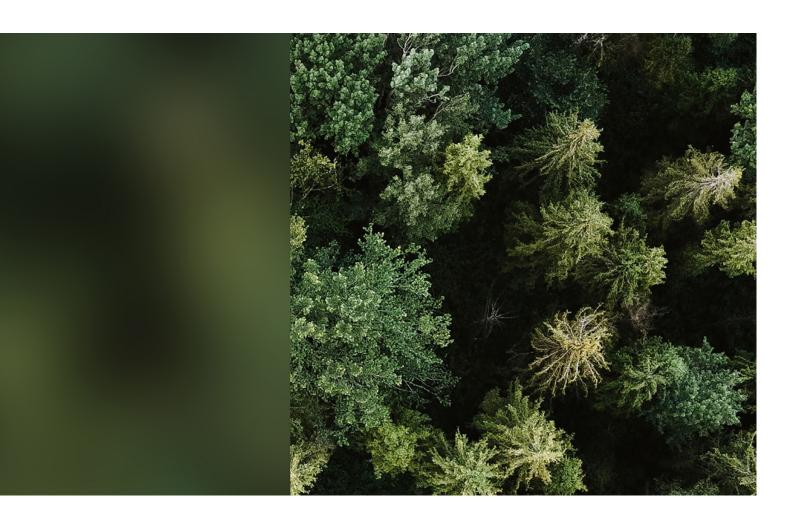


# Reporting requirements

This section details the reporting and assurance requirements for each of the key metrics outlined in the VCMI Claims Code of Practice, and incorporates the 4 steps for making a VCMI Claim. A summary of the key metrics is provided in Appendix B.

Within each of the 4 steps for making a VCMI Claim set out below, all requirements and guidance provided in the VCMI Claims Code are reflected within this section of the MRA Framework. For each of the key metrics outlined in this section, VCMI guidance is categorized as:

- Requirements: These requirements reflect those included within the VCMI Claims Code and are further elaborated to help guide companies on what needs to be adhered to in order to make a VCMI Claim.
- Complementary reporting: This refers to additional complementary reporting to reflect where companies may already be reporting those metrics, such as through other voluntary or mandatory sustainability reporting frameworks. This may include responses to the CDP Climate Change Questionnaire (note that guidance given in this section refers to questions within the 2023 version of this CDP questionnaire). Companies are not required to carry out any of this complementary reporting, in order to make a VCMI Claim.



# Step 1: Comply with the Foundational Criteria

The initial step towards attaining a VCMI Claim is establishing compliance with the Foundational Criteria. This step represents the majority of the reporting and verification requirements to obtain a VCMI Claim. Compliance with all metrics and assurance levels across the Foundational Criteria is the defining prerequisite for attaining a VCMI Claim. The outline of each Foundational Criterion is provided below with compliance requirements provided in the subsequent sections.

- Foundational Criterion 1: Maintain and publicly disclose an annual greenhouse gas emissions inventory;
- Foundational Criterion 2: Set and publicly disclose science-aligned near-term emission reduction targets, and publicly commit to reaching net zero emissions no later than 2050;
- Foundational Criterion 3: Demonstrate that the company is making progress in financial allocation, governance and strategy towards meeting its near-term emission reduction target;
- Foundational Criterion 4: Demonstrate that the company's public policy advocacy supports the goals of the Paris Agreement and does not represent a barrier to ambitious climate regulation.

Foundational Criterion 1: Maintain and publicly disclose an annual greenhouse gas emissions inventory

# REQUIREMENTS FOR EMISSIONS INVENTORIES

As detailed within the Claims Code, companies are required to:

- Make an enterprise-wide GHG emissions inventory publicly available on the company's website and update it annually;
- Report their GHG emissions inventory in accordance with the most up to date GHG Protocol Corporate Accounting and Reporting Standard, the GHG Protocol Corporate Value Chain (scope 3) Accounting and Reporting Standard, and the forthcoming Land Sector and Removals Guidance;
- Include in the GHG emissions inventory company-wide scopes 1 and 2 emissions, separately disclosing scope 2 emissions calculated using the location-based and market-based approaches as per the GHG Protocol Scope 2 Guidance. However, a single and consistent accounting approach (either market-based or location-based) must be used for setting and tracking progress towards targets, in line with SBTi's near-term emission reduction target criteria. Companies shall also include scope 3 emissions for all existing emissions sources, according to the minimum boundary established for each of the fifteen scope 3 categories as set out by the most up to date GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard;
- Provide clear explanations and estimations of how any structural changes to the company, methodological changes, or changes to activity data or emission factors applied have affected the most recent reporting year's inventory, in order to be able to separate any impacts that are due to methodological changes from impacts due to actual mitigation actions. If structural changes or changes in methodology or data sources result in significant differences in emissions, companies are required to recalculate base-year emissions in accordance with the most up to date GHG Protocol Corporate Accounting and Reporting Standard and the Corporate Value Chain (scope 3) Accounting and Reporting Standard. In the absence of a base year emissions

recalculation policy, a company must agree to apply a 5% significance threshold for emission recalculations<sup>4</sup>.

# **GUIDANCE**

Companies may report their GHG emissions inventory through any of the following formats, as long as assurance has been obtained as required for the respective metrics: CDP Climate Change Questionnaire; the reporting company's annual sustainability report or annual statement of GHG emissions; or Global Reporting Initiative (GRI) disclosure that includes GRI 305-1, 305-2, and 305-3, or its Sustainable Accounting Standards Board (SASB) index.

VCMI acknowledges that data availability is a challenge for many companies. However, in the pursuit of net zero, VCMI encourages companies to take measures to expand and improve processes for capturing higher quality and more comprehensive data across all material scope 3 emissions categories. For guidance on collecting emissions data, please refer to the most up to date GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (see Chapter 7: Collecting Data).

Metric 1.1: Gross scope 1 GHG emissions in metric tonnes of CO<sub>2</sub> equivalent for the base year and most recent reporting year

# VCMI REQUIREMENTS

Companies must obtain limited assurance over their base year and most recent reporting year scope 1 emissions. Companies must also publicly disclose gross scope 1 GHG emissions values for the base year and most recent reporting year. Companies must obtain limited assurance over their current year gross scope 1 GHG emissions values every year. When performing assurance, the most up to date <a href="GHG Protocol Corporate">GHG Protocol Corporate</a>
<a href="Accounting and Reporting Standard">Accounting and Reporting Standard</a> should be referenced. Reasonable assurance over this metric may be required in the future to align with evolving regulatory disclosure frameworks.

Companies are required to adhere to the most up to date <u>GHG Protocol</u> <u>Corporate Accounting and Reporting Standard</u> when compiling scope 1 emissions within their greenhouse gas inventory.

A recalculation shall be made in the event of structural or methodological changes or significant errors impacting the accuracy and reliability of this metric as defined by the most up to date <u>GHG Protocol Corporate</u> <u>Accounting and Reporting Standard</u>. As defined by the GHG Protocol, structural changes may be a result of mergers, acquisitions, or divestments or changes in the outsourcing or insourcing of emitting activities. Changes in calculation methodology or improvements in the accuracy of emissions factors or activity data may also impact the accuracy and reliability of this metric as can the discovery of significant errors or several cumulative errors, that are collectively significant.

The 5% threshold is in line with the requirement outlined by the SBTi which states, "A company's base year emissions recalculation policy must include a significance threshold of 5% or less that is applied to emission recalculations or in the absence of a base year emissions recalculation policy, a company must agree to apply a 5% significance threshold for emission recalculations."

Recalculations can be divided into two categories to determine required actions:

- Recalculation(s) of baseline and/or previous VCMI Claim reporting
  year data discovered during assurance performed over the most
  recent reporting year. In this case, the recalculation(s) shall be made,
  and assurance provided over the restated data during the most recent
  reporting year assurance process.
- Recalculation(s) discovered for the baseline and/or previous VCMI
   Claim reporting year data subsequent to issuance of assurance for
   the most recent reporting year. If recalculation(s) are uncovered post issuance of the assurance report, the recalculations shall be made and
   assured as part of the following year's assurance process.

# **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within question C.6.1 "What were your organization's gross global Scope 1 emissions in metric tonnes  $CO_2e$ ?". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, provided public disclosure of CDP submission was selected.

Companies following the <u>SBTi Criteria and Recommendations for Near-term Targets</u> and <u>SBTi Corporate Net Zero Standard</u>, will already be required to disclose this metric. Additionally, this metric can be found within section 29 (a) of the most up to date International Financial Reporting Standards (<u>IFRS</u>) <u>S2 standards</u>. Lastly, this metric can be found within the most up to date GRI framework <u>305-1</u>: <u>Direction Scope 1 emissions</u> and within the most up to date Task Force on Climate-related Financial Disclosures (TCFD) framework in <u>Metrics</u> and Targets recommended disclosure (b).



Metric 1.2: Gross scope 2 GHG emissions in metric tonnes of CO<sub>2</sub> equivalent for the base year and most recent reporting year

# **VCMI REQUIREMENTS**

Companies must obtain limited assurance over their base year and most recent reporting year scope 2 emissions. Claimants must also publicly disclose gross scope 2 GHG emissions values for the base year and most recent reporting year. Companies must obtain limited assurance over their current year gross scope 2 GHG emissions values every year. During assurance engagements, the standard provided below should be referenced. Reasonable assurance over this metric may be required in the future to align with evolving regulatory disclosure frameworks.

To compile a greenhouse gas emissions inventory for scope 2 emissions, companies are required to adhere to the most up to date <u>GHG Protocol Corporate Accounting and Reporting Standard</u>. Additionally, the <u>GHG Protocol Scope 2 Guidance should be leveraged as guidance.</u>

A recalculation shall be made in the event of structural or methodological changes or significant errors impacting the accuracy and reliability of this metric as defined by the most up to date <a href="GHG Protocol Corporate">GHG Protocol Corporate</a>
<a href="Accounting and Reporting Standard">Accounting and Reporting Standard</a>. As defined by the GHG Protocol, structural changes may be a result of mergers, acquisitions, or divestments or changes in the outsourcing or insourcing of emitting activities. Changes in calculation methodology or improvements in the accuracy of emissions factors or activity data may impact the accuracy and reliability of this metric, as can the discovery of significant errors or several cumulative errors, that are collectively significant.

Recalculations will fall into two categories to determine required actions:

- Recalculation(s) of baseline and/or previous VCMI Claim reporting
  year data discovered during assurance performed over the most
  recent reporting year. In this case, the recalculation(s) should be made,
  and assurance provided over the restated data during the most recent
  reporting year assurance process.
- Recalculation(s) discovered for the baseline and/or previous VCMI
  Claim reporting year data subsequent to issuance of assurance for
  the most recent reporting year. If recalculation(s) are uncovered postissuance of the assurance report, the recalculations should be made
  and assured as part of the following year's assurance process.

### COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within question C.6.3 "What were your organization's gross global Scope 2 emissions in metric tonnes  $CO_2e$ ?". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies following the <u>SBTi Criteria</u> and <u>Recommendations</u> for <u>Near-term Targets</u> and <u>SBTi Corporate Net Zero Standard</u> will be required to disclose this metric. Additionally, this metric can be found within section 29 (a) of the most up to date <u>IFRS S2 standards</u>. Lastly, this metric can be found within the most up to date GRI framework <u>305-2</u>: <u>Energy indirect (scope 2) emissions</u> and within the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure (b).

Metric 1.3: Gross scope 3 GHG emissions in metric tonnes of CO<sub>2</sub> equivalent by category for the base year and most recent reporting year

# **VCMI REQUIREMENTS**

Companies must publicly disclose gross scope 3 GHG emissions values for the base year and most recent reporting year annually. Limited assurance over this metric may be required in the future to align with evolving regulatory disclosure frameworks.

To compile a greenhouse gas emissions inventory for scope 3 emissions, companies are required to adhere to the most up to date <u>GHG Protocol</u> Corporate Value Chain (Scope 3) Standard.

A recalculation shall be made in the event of structural or methodological changes or significant errors impacting the accuracy and reliability of this metric as defined by the most up to date <a href="GHG Protocol Corporate">GHG Protocol Corporate</a>
<a href="Accounting and Reporting Standard">Accounting and Reporting Standard</a>. As defined by the GHG Protocol, structural changes may be a result of mergers, acquisitions, and divestments or changes in the outsourcing or insourcing of emitting activities. Changes in calculation methodology or improvements in the accuracy of emissions factors or activity data may impact the accuracy and reliability of this metric, as can the discovery of significant errors, or several cumulative errors, that are collectively significant.

### **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have disclosed this metric within question C6.5 "Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies following the <u>SBTi Criteria and Recommendations for Near-term Targets</u> and <u>SBTi Corporate Net Zero Standard</u> will be required to disclose this metric. Additionally, this metric can be found within section 29 (a) of the most up to date <u>IFRS S2 standards</u>. Lastly, this metric can be found within the GRI framework <u>305-3</u>: <u>Other indirect (scope 3) emissions</u> and within the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure (b).



Metric 1.4: A list of scope 3 categories included and excluded, with justification of exclusion, for the base year and reporting year

# **VCMI REQUIREMENT**

To satisfy the VCMI Claims Code, companies must publicly disclose a list of the scope 3 categories they have included and excluded, with justification of exclusion, for the base year and reporting year annually. Limited assurance over this metric may be required in the future to align with evolving regulatory disclosure frameworks.

To compile a greenhouse gas emissions inventory for scope 3 emissions, companies are required to adhere to the most up to date <u>GHG Protocol</u> Corporate Value Chain (Scope 3) Standard.

A recalculation shall be made in the event of structural or methodological changes or significant errors impacting the accuracy and reliability of this metric as defined by the most up to date <a href="GHG Protocol Corporate Accounting and Reporting Standard">GHG Protocol Corporate Accounting and Reporting Standard</a> occur. As defined by the GHG Protocol, structural changes may be a result of mergers, acquisitions, or divestments or changes in the outsourcing or insourcing of emitting activities. Changes in calculation methodology or improvements in the accuracy of emissions factors or activity data may impact the accuracy and reliability of this metric, as can the discovery of significant errors or several cumulative errors, that are collectively significant.

# **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within question C6.5 "Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies following the <u>SBTi Criteria and Recommendations for Near-term Targets</u> and <u>SBTi Corporate Net Zero Standard</u> will be required to disclose this metric. Additionally, this metric can be found within section 29 (a) of the most up to date <u>IFRS S2 standards</u>. Lastly, this metric can be found within the GRI framework <u>305-3</u>: Other indirect (scope 3) emissions and within the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure (b).

Metric 1.5: An explanation for any base year recalculations

# VCMI REQUIREMENT

To satisfy the VCMI Claims Code, companies must obtain limited assurance over scope 1 and 2 recalculations and publicly disclose scope 3 recalculations. In addition to limited assurance, public disclosure of scope 1 and 2 recalculations is required. During assurance engagements over scope 1 and 2 recalculations, the standard provided below should be referenced. Reasonable assurance may be required over scope 1 and 2 recalculations and limited assurance may be required over scope 3 recalculations in the future to align with evolving regulatory disclosure frameworks.

When recalculating a greenhouse gas emissions baseline due to changes, companies are required to adhere to the most up to date <u>GHG Protocol Corporate Accounting and Reporting Standard</u>. As defined by the GHG Protocol, these changes may be related to structural changes within the organization because of mergers, acquisitions, or divestments or changes

in the outsourcing or insourcing of emitting activities. These changes in the baseline value may also be due to changes in calculation methodologies, or improvements in the accuracy of emissions factors or activity data. Lastly, the changes in the baseline value may be a result of the discovery of significant errors or several cumulative errors, that are collectively significant, which may impact the accuracy and reliability of data.

The GHG Protocol's <u>Base year recalculation methodologies for structural changes</u> further details how to account for structural changes.

Recalculations can be divided into two categories to determine required actions:

- Recalculation(s) of baseline and/or previous VCMI Claim reporting
  year data discovered during assurance performed over the most
  recent reporting year. In this case, the recalculation(s) shall be made,
  and assurance provided over the restated data during the most recent
  reporting year assurance process.
- Recalculation(s) discovered for the baseline and/or previous VCMI
   Claim reporting year data subsequent to issuance of assurance for
   the most recent reporting year. If recalculation(s) are uncovered post issuance of the assurance report, the recalculations shall be made and
   assured as part of the following year's assurance process.

### COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within questions:

- C5.1a "Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?"
- C5.1b "Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?"
- C5.1c "Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in C5.1a and/or C5.1b?"

Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies that have a science-aligned target will be encouraged to disclose significant increases or decreases in their GHG inventory leading to a need to recalculate and revalidate a target as stated in the <u>SBTi Corporate Manual</u>. This metric can be found within the most up to date GRI framework <u>305-1</u>: <u>Direction Scope 1 emissions</u>, 305-2: Energy indirect (scope 2) emissions, and 305-3: Other indirect (scope 3) emissions.

Foundational Criterion 2: Set and publicly disclose sciencealigned near-term emission reduction targets, and publicly commit to reaching net zero emissions no later than 2050

# REQUIREMENTS FOR NEAR-TERM EMISSION REDUCTION TARGETS

As detailed within the Claims Code, companies are required to:

- Set and publicly disclose near-term emission reduction targets covering Scopes 1, 2 and 3. These targets must be set following the most up to date criteria for setting near-term emission reduction targets from SBTi or an equivalent<sup>5</sup> science-aligned target setting framework. SBTi requires near-term emission reduction targets to be within 5-10 years, i.e., a maximum of 10 years into the future from the date the target was set. Targets can be set in absolute or intensity terms, following SBTi's criteria for setting near-term emission reduction targets.
- Follow the most up to date SBTi criteria or equivalent criteria for setting the target boundary and emissions coverage. SBTi defines 95% coverage of scopes 1 and 2 emissions, and 67% coverage of scope 3 emissions if scope 3 emissions represent over 40% of the inventory from all scopes. For power companies, SBTi sector specific criteria must be followed, including setting a third target covering 100% of emissions from downstream use of fossil fuels.
- For companies with targets following the SBTi near-term target setting
  criteria, but which have not had these targets validated, they must
  submit a target to SBTi for validation within 24 months<sup>6</sup>. To obtain
  a VCMI Claim, the company must provide evidence of the SBTi
  Commitment Letter as part of the formal SBT commitment process,
  and it has to be listed as "committed" on the SBTi target dashboard.
- VCMI will review the target setting landscape in the coming years and update the Claims Code to reflect additional robust, science-aligned frameworks as they become available.

# REQUIREMENTS FOR LONG-TERM NET ZERO EMISSION REDUCTION TARGETS

As detailed within the Claims Code, companies are required to:

- Make a public commitment to achieve net zero emissions no later than 2050, including scopes 1, 2, and 3 GHG emissions, as well as land-based GHG emissions where applicable;
- Disclose the definition of net zero they have adopted, in line with globally recognized sustainability frameworks or guidance, as well as the principles and/ or methodology they have used or intend to use to set their net zero target;
- Use the same base year for the long-term net zero target, once it is set, as that used for the initial near-term target.

# **GUIDANCE**

- Companies are encouraged to set a base year as the most recent year with available data.
- Companies are encouraged to set a long-term emission reduction

<sup>5</sup> In 2024 VCMI will work to identify equivalent target setting frameworks which it deems acceptable for the purposes of making a VCMI Claim

<sup>6</sup> The 24-month period to submit a target for SBTi validation is aligned with the formal SBTi commitment process.

target, in line with their commitment to reaching net zero no later than 2050, within 24 months of obtaining a VCMI Claim.

- When communicating the scope of emissions included within their targets, VCMI suggests that the emissions coverage of a company's targets, expressed as a share of total scopes 1, 2, and 3 emissions, be prominently displayed and communicated alongside any target-related communication made by the company. For example, if a company sets a target to reduce emissions by 30%, covering 75% of its total value-chain emissions, it should disclose the 75% coverage in any communication related to the 30% target, so as not to mislead stakeholders.
- Companies are encouraged to align with the recommendations set out by the United Nations <u>High Level Expert Group on the Net Zero</u> <u>Emissions Commitments of Non-State Entities</u> and the <u>UN-led Race to</u> <u>Zero</u>, which requires companies to halve emissions by 2030. Companies are also encouraged to join the UN-led Race to Zero campaign.

# Near-term emission reduction target metrics

The requirements outlined for near-term emission reduction targets in Foundational Criterion 2 (FC2) must be met through SBTi validation of targets.

Companies shall disclose the following near-term emissions reduction metrics in their first year of submitting for a VCMI Claim and again as near-term targets are updated:

- Metric 1.6: Near-term emission reduction target base year
- Metric 1.7: Near-term emission reduction target year
- Metric 1.8: Near-term emission reduction target boundary
- Metric 1.9: Near-term emission reduction target ambition

# **VCMI REQUIREMENTS**

Companies must publicly disclose their SBTi validated near-term emission reduction target base year, target year, target boundary, and target ambition.

Targets must be revalidated at a minimum of every 5 years or whenever the next near-term target is developed in alignment with the most up to date <u>SBTi Criteria and Recommendations for Near-Term Targets</u> or equivalent. Public disclosure of revalidated target base year, target year, target boundary, and target ambition are required whenever near-term targets are updated.

The recalculation methodology as outlined in the most up to date <u>SBTi</u> <u>Criteria and Recommendations for Near-Term Targets</u>, or equivalent, should be referenced if an organizational change occurs that could compromise the relevance and consistency of the existing target.

If a company does not have an SBTi validated near-term target, then the company will be granted a maximum period of 24-months to submit a near-term target for validation by the SBTi<sup>7</sup>. To receive a VCMI Claim, the company must provide evidence of an SBTi Commitment Letter. The SBTi Commitment Application can be found <a href="https://example.com/here">here</a>. Once committed, the company can provide evidence of their commitment as indicated on the <a href="https://example.com/SBTi target dashboard">SBTi target dashboard</a>. Please note the SBTi commitment process is only available to companies which already have targets following SBTi guidance but are not yet validated. In addition, public disclosure of the near-term emission reduction target base year, target year, target boundary, and target ambition are required.

In order to comply with the requirements outlined in Foundational Criterion 2, existing near-term emission reduction targets must follow the criteria outlined in the <u>SBTi Criteria and Recommendations for Near-Term Targets</u> or equivalent. For companies following the SBTi guidance, notable criteria include:

- 1. Near-term emission reduction targets must cover a minimum of 5 years and a maximum of 10 years. Please note that targets that cover more than 10 years are considered long-term targets. For more detail, please see the <u>SBTi Criteria and Recommendations for Near-Term Targets</u>.
- 2. Companies may exclude up to 5% of scopes 1 and scope 2 emissions combined in the boundary of the inventory and target. Companies may exclude a maximum of 5% of emissions from their total scope 3 inventory. For more detail, please see the <a href="SBTi Criteria">SBTi Criteria</a> and Recommendations for Near-Term Targets.

### **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed these metrics within questions C4.1a: "Provide details of your absolute emissions target(s) and progress made against those targets" and C4.1b: "Provide details of your emissions intensity target(s) and progress made against those target(s)." Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies that have a science-aligned target will be encouraged to disclose these metrics as stated in the <u>SBTi Corporate Manual</u>. Additionally, these metrics can be found within section 33 of the <u>IFRS S2 standards</u>. Depending on the specific responses provided by a company, the above metrics may be captured within the GRI framework <u>103-2</u>: The management approach and its components and in the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure.

<sup>7</sup> The 24-month period to submit a target for SBTi validation is aligned with the formal SBTi commitment process, assuming an SBTi Commitment Letter is obtained.

Metric 1.10: Has near-term emissions reduction target been validated by SBTi?

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose if their near-term emission reduction targets have been validated by the SBTi in their first year of obtaining a VCMI Claim. Public disclosure of SBTi validated near-term emission reduction targets is required upon validation by the SBTi. For companies without validated science-based near-term targets, they must utilize the 24-month period to submit a target for validation by the SBTi, as detailed under Metrics 1.6-1.9 above.

# COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within questions C4.1a: "Provide details of your absolute emissions target(s) and progress made against those targets" and C4.1b "Provide details of your emissions intensity target(s) and progress made against those target(s)."

This metric can be found within section 34 (a) of the <u>IFRS S2 standards</u>. Within the GRI framework <u>103-2</u>: The management approach and its components, the above metric may be captured depending on the specific responses provided by a company. Lastly, this metric may be found within the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure depending on the specific responses provided by a company.

Metric 1.11: Date long-term net zero commitment was made

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose the date in which the net zero commitment is expected to be achieved.

# **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire may have disclosed this metric within question C4.2c stating "Provide details of your net-zero target(s)," although it is not directly asked within the questionnaire what the date is that the long-term net zero commitment was made.

Depending on the specific responses provided by a company, the above metric may be captured within the GRI framework <u>103-2</u>: The management approach and its components, and in the most up to date TCFD framework within Metrics and Targets recommended disclosure.

# Metric 1.12: Long-term net zero definition

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose the net zero definition used, in the first year of obtaining a VCMI Claim.

### **COMPLEMENTARY REPORTING**

Companies that have a science-aligned target will be encouraged to disclose this metric as stated in the <u>SBTi Corporate Manual</u>. This metric is partially covered by 10 (d) of the <u>IFRS S2 standards</u>. Depending on the specific responses provided by a company, the above metric may be captured within the GRI framework <u>103-2</u>: The management approach and its components, and in the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure.

# Foundational Criterion 3: Demonstrate that the company is making progress on financial allocation, governance, and strategy towards

meeting its near-term

emission reduction

target

# REQUIREMENTS FOR FINANCIAL ALLOCATION

As detailed within the Claims Code, companies are required to:

- Publicly disclose total financial allocation made during the most recent reporting year dedicated to GHG mitigation across the company's value chain. Companies shall disclose information relating to at least one of the requirements below:
  - The percentage of annual revenue that was dedicated to GHG mitigation; or
  - The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that was dedicated to GHG mitigation.
     Companies shall disclose the definition chosen for CAPEX and OPEX metrics using existing definitions from global or regional taxonomy; or
  - If a company cannot disclose the aforementioned metrics, it shall provide a statement to explain why, and a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.
- Publicly disclose total planned financial allocation dedicated to GHG mitigation across the company's value chain. Companies shall disclose information relating to at least one of the requirements below:
  - The percentage of annual revenue earmarked for GHG mitigation; or
  - The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that will be dedicated to GHG mitigation.
     Companies shall disclose the definition chosen for CAPEX and OPEX metrics using existing definitions from global or regional taxonomy; or
  - If a company cannot disclose the aforementioned metrics, it shall provide a statement to explain why, and a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.



# REQUIREMENTS FOR STRATEGY AND GOVERNANCE

As detailed within the <u>Claims Code</u>, companies are required to publicly disclose the following information related to the company's governance structure for overseeing progress in reaching near-term targets. Companies shall disclose at least one of these metrics:

- Whether their Board or senior-management-level compensation is linked to climate performance indicators.
   If yes, then companies shall disclose a description of the Board or senior-management-level compensation policy and indicators related to climate performance; or
- Whether their Board members or senior-management level have capabilities or expertise on climate-related issues. If yes, then companies shall disclose a description of the climaterelated capabilities and expertise held by Board members or senior-management-level; or
- Whether they conduct Board-level reviews on progress towards meeting near-term emission reduction targets. If yes, then companies shall disclose the frequency of these Boardlevel reviews.

# **GUIDANCE**

VCMI recommends that companies draw on guidance established by the most up to date TCFD framework and the specific provisions of the ISSB's IFRS S2 Climate-related Disclosures. Many companies may already be communicating the above disclosure requirements as part of their annual reporting, including CDP reporting.

If applicable, VCMI recommends that companies publicly disclose any changes in capital allocation from the most recent reporting year that were made to address climate-related risk and opportunities.

Public disclosure of at least one metric regarding financial contributions towards GHG mitigation made during the most recent reporting year

Public disclosure of at least one metric regarding financial allocation towards GHG mitigation made during the most recent reporting year To satisfy the VCMI Claims Code, every year companies must publicly disclose at least one of the below metrics regarding financial allocation made during the most recent reporting year:

- Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain; or
- Metric 1.14: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) made during the most recent reporting year dedicated to GHG mitigation across the company's value chain; or
- Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.

Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose either metric 1.13, 1.14 or 1.18 as listed above on an annual basis if intending to obtain a VCMI Claim annually. If a company chooses to disclose this metric 1.13, then the company is granted the flexibility to calculate this metric according to its preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the <a href="EU Taxonomy for Sustainable Activities">EU Taxonomy for Sustainable Activities</a>, the <a href="South African Green Finance Taxonomy">South African Green Finance Taxonomy</a>, and China's <a href="Green Bond Endorsed Project Catalogue">Green Bond Endorsed Project Catalogue</a>.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

If companies are unable to report this metric relating to financial allocation, it must report against metric 1.14 or metric 1.18.

# COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire will have disclosed this metric within questions C3.5: "In your company's financial accounting, do you identify spending/revenue that is aligned with your company's climate transition?" and C5.3a stating "Quantify the percentage share of your spending/revenue that is aligned with your company's climate transition". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies that have a science-aligned target are encouraged to disclose any near-term investments that demonstrate the integrity of their commitment to their emission reduction targets as stated in the most up to date <u>SBTi Corporate Manual</u>. This metric can be found within section 14 of the most up to date <u>IFRS S2 standards</u>. Depending on the specific responses provided by a company, the above metric may be captured within the GRI framework <u>103-2</u>: The management approach and its components, and in the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure.

Metric 1.14: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) made during the most recent reporting year dedicated to GHG mitigation across the company's value chain

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose either metric 1.13, 1.14 or 1.18 annually as listed above. If a company chooses to disclosure metric 1.14, then the company is granted the flexibility to calculate this metric according to its preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the EU Taxonomy for Sustainable Activities, the South African Green Finance Taxonomy, and China's Green Bond Endorsed Project Catalogue.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

If companies are unable to report this metric relating to financial allocation, it must report against metric 1.13 or metric 1.18.

# **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within questions C3.5: "In your company's financial accounting, do you identify spending/revenue that is aligned with your company's climate transition?" and C5.3a stating "Quantify the percentage share of your spending/revenue that is aligned with your company's climate transition". Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies that have a science-aligned target are encouraged to disclose investments deployed in the reporting year to mitigate climate change beyond their value chain as stated in the most up to date <u>SBTi</u> <u>Corporate Manual</u> or equivalent. Depending on the specific responses provided by a company, the above metric may be captured within the most up to date GRI framework <u>103-2</u>: The management approach and <u>its components</u>, and in the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure. Lastly, this metric can be found within section 14 of the most up to date <u>IFRS S2 standards</u>.

# Metric 1.15: Definition of CAPEX and OPEX

# **VCMI REQUIREMENTS**

Please note that this metric must be disclosed **only** if the company opted to disclose:

- Metric 1.14: The percentage of CAPEX and OPEX made during the most recent reporting year dedicated to GHG mitigation across the company's value chain; and / or
- Metric 1.17: The percentage CAPEX and OPEX dedicated to GHG mitigation across the company's value chain.

Disclosure of metric 1.15 is required in a company's first year of obtaining a VCMI Claim and on an annual basis assuming either metric 1.14 or 1.17 is selected. The definitions should include details regarding what activities the company is classifying as value chain mitigation.

The metrics listed above do not provide a specific set of standardized guidelines. In this sense, companies are granted the flexibility to calculate these metrics according to their preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the <u>EU Taxonomy for Sustainable Activities</u>, the <u>South African Green Finance Taxonomy</u>, and China's Green Bond Endorsed Project Catalogue.

Should a company's definition of CAPEX and OPEX change, the redefinition should be publicly disclosed.

### COMPLEMENTARY REPORTING

This metric may be found within the most up to date TCFD framework under <u>Metrics and Targets</u> recommended disclosure depending on the specific responses provided by a company.

Public disclosure of at least one metric regarding planned financial allocation to GHG mitigation To satisfy the VCMI Claims Code, companies must publicly disclose on an annual basis at least one of the below metrics regarding planned financial allocation:

- Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain; or
- Metric 1.17: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that will be dedicated to GHG mitigation across the company's value chain; or
- Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.

Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain

# VCMI REQUIREMENTS

To satisfy the VCMI Claims Code, companies must publicly disclose either metric 1.16, 1.17 or 1.1.8 annually. If a company chooses to disclosure metric 1.16, percentage of planned annual revenue dedicated to GHG mitigation across the company's value chain, then the company is granted the flexibility to calculate this metric according to its preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the EU Taxonomy for Sustainable Activities, the South African Green Finance Taxonomy, and China's Green Bond Endorsed Project Catalogue.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

If companies are unable to report this metric relating to financial allocation, it must report against metric 1.17 or metric 1.18

# COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire may have disclosed this metric within question C5.3a: "Quantify the percentage share of your spending/revenue that is aligned with your company's climate transition".

Companies that have a science-aligned target are encouraged to disclose planned investments that demonstrate the integrity of their commitment in the target year as stated in the most up to date <u>SBTi Corporate Manual</u>. This metric can be found within section 14 of the most up to date <u>IFRS S2 standards</u>. Additionally, depending on the specific responses provided by a company. the above metric may be captured within the GRI framework <u>103-2</u>: The management approach and its components, and within the most up to date TCFD framework under <u>Metrics and Targets</u> recommended disclosure.

Metric 1.17: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that will be dedicated to GHG mitigation across the company's value chain

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose either metric 1.1.6, 1.17 or 1.18 annually. If a company chooses to disclosure metric 1.17, percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) dedicated to GHG mitigation across the company's value chain, then the company is granted the flexibility to calculate this metric according to its preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the <u>EU Taxonomy for Sustainable Activities</u>, the <u>South African Green Finance Taxonomy</u>, and China's <u>Green Bond Endorsed Project Catalogue</u>.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

If companies are unable to report this metric relating to financial allocation, it must report against metric 1.16 or metric 1.18

# COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire may have disclosed this metric within question C5.3a: "Quantify the percentage share of your spending/revenue that is aligned with your company's climate transition".

Companies that have a science-aligned target are encouraged to disclose planned investments to be deployed to mitigate climate change beyond their value chain as stated in the most up to date <u>SBTi</u> <u>Corporate Manual</u>. This metric can be found within section 14 of the most up to date <u>IFRS S2 standards</u>. Depending on the specific responses provided by a company, the above metric may be captured within the most up to date GRI framework <u>103-2</u>: The management approach and its components, and within the most up to date TCFD framework under <u>Metrics and Targets</u> recommended disclosure.

Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation

# **VCMI REQUIREMENTS**

If a company is unable to report at least one of the metrics regarding financial allocation made during the most recent reporting year (metric 1.13 and/or metric 1.14), then a public statement is required that explains why the aforementioned financial metrics cannot be disclosed and provides a qualitative description and analysis of investments made, and steps taken related to GHG mitigation. This public statement is required on an annual basis assuming the company is unable to report at least one of the metrics regarding financial allocation made during the most recent reporting year. The statement must include an explanation and a qualitative description and analysis of investments made and steps taken related to GHG mitigation. This explanation may include key elements of the company's climate strategies or annual sustainability reports. The company must publicly disclose, on an annual basis, a qualitative description and analysis of investments made and steps taken related to GHG mitigation.

Additionally, if a company is unable to report at least one of the metrics regarding planned financial allocation dedicated to GHG mitigation (metric 1.16 and/or metric 1.17), then a public statement is required that explains why the aforementioned financial metrics cannot be disclosed and provides a qualitative description and analysis of investments made, and steps taken related to GHG mitigation. This public statement is required on an annual basis assuming the company is unable to report at least one of the metrics regarding planned financial allocation to GHG mitigation. The statement must include an explanation and a qualitative description and analysis of investments made and steps taken related to GHG mitigation. This explanation may include key elements of the company's climate strategies or annual sustainability reports. In addition, the company must publicly disclose, on an annual basis, a qualitative description and analysis of investments made and steps taken related to GHG mitigation.

If the company is unable to report on financial contributions made in both the most recent reporting year, as well as planned financial allocation (i.e. financial allocation for the future), the company is able to make one public statement that addresses both of these reporting periods, following guidance provided above.

The metrics outlined within FC3 do not provide a specific set of standardized guidelines for classification, measurement, and computation. In this sense, companies are granted the flexibility to calculate these metrics according to their preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the <a href="EU Taxonomy">EU Taxonomy</a> for Sustainable <a href="Activities">Activities</a>, the <a href="South African Green Finance Taxonomy">South African Green Finance Taxonomy</a>, and China's <a href="Green Bond Endorsed Project Catalogue">Green Bond Endorsed Project Catalogue</a>.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

### **COMPLEMENTARY REPORTING**

Companies that have a science-aligned target are encouraged to disclose any near-term investments that demonstrate the integrity of their commitment to emission reduction targets as stated in the most up to date <u>SBTi Corporate Manual</u>. This metric can be found within section 14 of the most up to date <u>IFRS S2 standards</u>. This metric may also be found within the most up to date TCFD framework within <u>Metrics and Targets</u> recommended disclosure depending on the specific responses provided by a company.

Metric 1.19: Public disclosure of one of the three metrics regarding the Board or senior management oversight

Companies shall disclose at least one of these metrics:

- Whether their Board or senior management level compensation is linked to climate performance indicators; or
- Whether their Board members or senior management level have capabilities or expertise on climate related issues; or
- Frequency of Board-level reviews on progress towards meeting nearterm emission reduction targets.



To satisfy the VCMI Claims Code, companies must publicly disclose one of the above metrics regarding their Board or senior management annually.

- If a company selects to disclose whether their Board or senior management level compensation is linked to climate performance indicators, then they must annually disclose a description of the Board-level or senior management compensation policy and the indicators related to climate performance.
- If a company selects to disclose whether their Board members or senior management level have capabilities or expertise on climaterelated issues, then they must annually disclose a description of the experience related to climate-related capabilities and expertise held by the Board or senior management.
- If a company selects to disclose the frequency of Board-level reviews on progress towards meeting near-term emission reduction targets, then they must annually disclose the frequency at which the Board is informed and reviews the company's progress towards near-term emission reduction targets.

The metrics outlined above do not provide a specific set of standardized guidelines. In this sense, companies are granted the flexibility to calculate these metrics according to their preferences, provided that the chosen definition for financial metrics aligns with existing definitions from global or regional taxonomies. Example taxonomies include the <u>EU Taxonomy for Sustainable Activities</u>, the <u>South African Green Finance Taxonomy</u>, and China's Green Bond Endorsed Project Catalogue.

Should changes impacting the accuracy and reliability of the metric selected for disclosure occur, the changes should be publicly disclosed.



### COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire may have already disclosed these metrics within the CDP questions below:

- C1.1 "Is there board-level oversight of climate-related issues within your organization?"
- C1.1b "Provide further details on the board's oversight of climate-related issues"
- C1.1d "Does your company have at least one board member with competence on climate-related issues?"
- C1.3 "Do you provide incentives for the management of climate-related issues, including the attainment of targets?"
- C1.3a "Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals)"

Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure as it relates to the Board or senior-management-level compensation linked to climate performance indicators and frequency of Board-level reviews on progress towards meeting near-term emissions reductions targets, assuming public disclosure of CDP submission was selected.

Companies that are following the SBTi Corporate Manual, are encouraged to disclose:

- Incentive structure related to climate change including any executive compensation linked to near and long-term targets
- Skills and human resource development related to climate change
- Governance structure of climate transition plans and review frequency of plans

Within the IFRS S2 standard, companies are required to disclose the following information:

- If climate-related considerations are factored into executive compensation
- Which climate-related skills and competencies are available within the Board and organization
- · Frequency at which the Board is informed about climate-related risks and opportunities

Within the GRI framework, the below metrics can be found in their respective sections:

- The metric regarding Board level compensation is captured within 103-2: The management approach and its components
- The metric regarding Board level capabilities or expertise on climate-related issues is captured in <u>GRI</u> 2: General Disclosures

The TCFD framework <u>Metrics and Targets</u> include the below disclosures which may align with those metrics stated above, depending on the specific responses provided by a company:

- Information regarding the frequency of Board-level reviews on progress towards meeting near-term emission reduction targets may be found within the most up to date TCFD framework under <a href="Metrics">Metrics</a> and Targets recommended disclosure a) or b)
- Information regarding remuneration linked to climate considerations may be found within the most up to date TCFD framework under <u>Metrics and Targets</u> recommended disclosure.

# Foundational Criterion 4: Demonstrate that the company's public policy advocacy supports the goals of the Paris Agreement and does not represent a barrier to ambitious climate regulation

Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement

# REQUIREMENTS FOR PUBLIC ADVOCACY

As detailed within the Claims Code, companies are required to:

 Submit a public statement describing how its advocacy activities are consistent with the goals of the <u>Paris Agreement</u>.

In cases where companies are not taking part in public policy advocacy activities, they shall publicly disclose that they do not engage in any activities, either directly or indirectly, that might influence policy, law, or regulation with potential climate impact. This includes activities through trade associations, professional bodies or other organizations of which they are a member.

### **GUIDANCE**

Companies can refer to the Global Standard on Responsible Corporate Climate Lobbying and its four categories (i.e., Policy and Commitment, Governance, Action, and Specific Disclosures) as best practice to describe alignment of advocacy activities to support the goal of the Paris Agreement

# **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must state whether they engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate, and provide the respective documentation as outlined below:

For companies that engage in advocacy activities: A public commitment/position statement confirming that advocacy activities are consistent with the goals of the Paris Agreement is required. Please note that for companies that submit responses to the CDP Climate Change Questionnaire and have those responses publicly available on the CDP website, this requirement will be met through the question "Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?".

Companies may choose to align their statement with the principles outlined in the most up to date <u>Global Standard on Responsible</u> <u>Corporate Climate Lobbying (GSRCL)</u>. Note that adherence to the most up to date GSRCL is not required to meet the above requirement as outlined in FC4. Please see below for examples of how a company may align with these principles:

- Policy and commitment: Companies may commit to align their own and their affiliates' global climate lobbying with Paris Agreement goals (e.g., science aligned targets, net zero commitment)
- Governance: Companies may establish comprehensive climate lobbying governance (e.g., strategy and implementation oversight, review, and stakeholder engagement process)
- Action: Companies may report alignment with Paris Agreement goals and proactively lobby (e.g., join coalitions,

annual review on own and affiliates alignment, report misalignment remediation) individually and with others – for policy measures that support the goal of limiting global temperature rise to 1.5°C above preindustrial levels.

 Public disclosure: Companies may disclose lobbying impact and influence over its affiliates (e.g., financial commitment, board roles in affiliates, lobbying impact on policy and corporate strategy)

For companies that do not engage in advocacy activities: A public statement confirming that the company does not engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate is required.

### COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire may have disclosed information related to the above metric within questions:

- C12.3 "Does your company engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?", specifically the question regarding "Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?"
- C12.3a "On what policy, law, or regulation that may impact the climate has your company been engaging directly with policy makers in the reporting year?"

Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

Companies that have a science-aligned target are encouraged to disclose their public advocacy, lobbying, and policy engagement expenditures and effort on policies that could limit or worsen climate change, as stated in the most up to date SBTi Corporate Manual.



# Step 2: Select a VCMI Claim to to make and demonstrate progress towards meeting near-term emission reduction targets

Companies are required to select the level of VCMI Claim they are pursuing, based on the volume of carbon credits purchased and retired. The levels include Carbon Integrity Silver, Gold, and Platinum.

The definitions of each claim are included in the VCMI Claims Code.

# REQUIREMENTS FOR COMPANIES MAKING VCMI CARBON INTEGRITY CLAIMS

As detailed within the Claims Code, companies making any VCMI Claim are required to:

- Disclose the VCMI Claim selected (Carbon Integrity Silver, Gold or Platinum)
- Publicly disclose a statement, asserting they have complied with the Foundational Criteria and all additional
  requirements in the VCMI Claims Code related to the chosen VCMI Claim. Please refer to the <u>Supplementary</u>
  <u>Guidance document</u> for clarity on how to communicate VCMI Claims. Companies shall meet the
  requirements outlined below, relating to the specific claim they seek to make. When referencing the Claims
  Code, companies should include a hyperlink to the document.
- Publicly disclose the percentage of total GHG emissions reductions achieved in the most recent reporting year in comparison to the total GHG emissions reported in the base year (i.e. base year used in the near-term target). This reduction can be expressed on an absolute or intensity-basis.
- Publicly provide an explanation that outlines whether and why the company considers that it has made progress towards meeting its near-term emission reduction target.

# Metric 2.1: VCMI Claim

# **VCMI REQUIREMENTS**

Companies are required to select the level of VCMI Claim they are pursuing, i.e. Carbon Integrity Silver, Gold or Platinum. The selected Claim level must be publicly disclosed on an annual basis. Regardless of the VCMI Claim selected, disclosing this metric is required.

Please see <u>Section 3</u> for a step-by-step guide on how to select the Claim level within the VCMI Claims Reporting Platform.

Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code

# **VCMI REQUIREMENTS**

Companies are required to publicly disclose a statement asserting that they have complied with the Foundational Criteria and all additional requirements in the VCMI Claims Code related to the chosen VCMI Claim (i.e., Carbon Integrity Silver, Gold, or Platinum Claims) on an annual basis. Regardless of the VCMI Claim selected, disclosing this metric is required.

Please see <u>Section 3</u> for a step-by-step guide on where to upload the statement.

Metric 2.3: The percentage of total GHG emissions reductions achieved in the most recent reporting year (in absolute or intensity terms) compared to the base year

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric annually. Limited assurance over this metric may be required in the future to align with the evolving regulatory disclosure frameworks.

Should changes impacting the accuracy and reliability of this metric occur, a recalculation should be made and publicly disclosed.

#### **COMPLEMENTARY REPORTING**

Companies that have a science-aligned target are encouraged to disclose this metric as stated in the most up to date <u>SBTi Corporate Manual</u>. This metric can be found within section 35 of the most up to date <u>IFRS S2 standards</u>, depending on the specific responses provided by the company. A metric similar to the metric stated above can be found within the GRI framework <u>305-1</u>: <u>Direction Scope 1 emissions</u>. This metric may be found within the most up to date TCFD framework under <u>Metrics and Targets</u> recommended disclosure depending on the specific responses provided by a company.

Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers itself to have made progress towards meeting its near-term emission reduction target

#### **VCMI REQUIREMENTS**

In addition to reporting the percentage of total GHG emissions reductions achieved, companies must also provide an explanation that outlines how and why the company considers itself to have made progress towards meeting its near-term emission reduction target. As part of the explanation, companies may consider disclosing key KPls it uses to monitor progress to targets.



#### COMPLEMENTARY REPORTING

The <u>SBTi Corporate Manual</u> "worked example of how companies can report target progress" provides insight into how an organization can articulate progress made through an example company. Information about the active emissions reduction initiatives, methods to drive investment in emissions reduction activities may help provide an explanation of how and why the company considers itself to have made progress towards meeting its near-term emission reduction target. Companies that have a science-aligned target are encouraged to disclose this metric as stated in the most up to date SBTi Corporate Manual.

Companies that have responded to the CDP Climate Change Questionnaire can utilize answers to the below questions to help in responding to metric 2.3:

- C4.1a "Provide details of your absolute emissions target(s) and progress made against those targets."
- C4.1b "Provide details of your emissions intensity target(s) and progress made against those target(s)."
- C4.3 "Did you have emissions reduction initiatives that were active within the reporting year?"
- C4.3a "Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings."
- C4.3b "Provide details on the initiatives implemented in the reporting year in the table below."
- C4.3c "What methods do you use to drive investment in emissions reduction activities?"

Within the <u>IFRS S2 standard</u>, companies are required to disclose the quantitative and qualitative climaterelated targets they have set to monitor progress towards achieving its strategic goals, and any targets they have required to meet by law or regulation, including any greenhouse gas emissions targets.

The TCFD framework <u>Metrics and Targets</u> include the below disclosures which may align with those metrics stated above, depending on the specific responses provided by a company:

• Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets which is found within the most up to date TCFD framework within Metrics and Targets recommended disclosure c).

Additionally, the <u>Task Force on Climate-related Financial Disclosures Guidance on Metrics, Targets, and Transition Plans</u> can be further referenced for example metrics and targets.

Lastly, within the most up to date GRI framework <u>305-1</u>: <u>Direction Scope 1 emissions</u>, companies are asked to disclose their GHG emissions reduced as a direct result of reduction initiatives

# Step 3: Meet the required carbon credit use and quality thresholds

#### REQUIREMENTS FOR THE PURCHASE AND RETIREMENT OF HIGH-QUALITY CARBON CREDITS

As detailed in the Claims Code, companies are required to:

- Purchase and retire the Core Carbon Principles (CCP)-Approved credits to make a VCMI Claim. While CCP-Approved credits are not widely available in the market, CORSIA eligible credits or existing contractually committed carbon credits supported by the company's due diligence process alignment to ICVCM's 10 CCP's, will be accepted as an interim measure until the Integrity Council for the Voluntary Carbon Market (ICVCM) Assessment Framework is implemented. Companies shall transition to purchase and retire CCP approved credits by January 1, 2026<sup>8</sup>. In the interim, companies should refer to the transition disclosures defined in metric 3.1.
- Publicly disclose the types, sources, quantities, and other relevant details regarding the carbon credits purchased and retired, as outlined in the section below.

#### REQUIREMENTS FOR REPORTING HIGH-QUALITY CARBON CREDITS

As detailed in the <u>Claims Code</u>, in addition to meeting the quality thresholds for carbon credit use, companies are required to publicly disclose key information related to each carbon credit retired, including:

- Number of credits purchased and retired that the company applied towards the VCMI Claim. These credits must align with VCMI's quality criteria as detailed in metric 3.1.
- Certification standard name, project name, project ID, retirement serial number, and retirement date and issuing registry.
- Host country, credit vintage, methodology, and project type.
- Whether or not the carbon credit is associated with a corresponding adjustment in accordance with Article 6 of the Paris Agreement. If the carbon credit is reported as being associated with a corresponding adjustment, applied either currently or in the future, this shall be evidenced by authorization by the participating Party or Parties, including information on the authorized use or uses, and the timings of the authorization, and the application of the corresponding adjustment.
- If associated with additional third-party certification regarding social or environmental integrity (e.g., Sustainable Development Goals (SDGs) label, Sustainable Development Verified Impact Standard (SD VISta), Climate, Community and Biodiversity Standards, etc.), companies must provide information related to how the carbon credit promotes equity and generates co-benefits to ecosystems and local economies.

VCMI reserves the right to revise this date, subject to changes in the availability of CCP-Approved carbon credits. Any revisions to this date will have no effect on the validity of pre-existing VCMI Claims.

Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim

VCMI Claims require the purchase and retirement of CCP-Approved credits. VCMI recognizes, however that at the time of publication of this document (November 2023), the ICVCM Assessment Framework for CCP-Approved credits is in the process of being implemented, likely resulting in a limited number of CCP-Approved credits being available in the near-term.

Additionally, VCMI recognizes that companies may have existing carbon credits procurement arrangements that were established prior to CCP-Approved credits becoming available in the market and that have been deemed of sufficient quality and integrity through a defined internal due diligence process. VCMI, therefore, offers companies two approaches to demonstrate the procurement of high-integrity credits during this transition phase until CCP-Approved credits become more widely available.

In the interim transition period until CCP approved credits are available in sufficient quantities, companies may:

- Purchase and retire CORSIA eligible credits when a specific activity type has not yet been assessed by the ICVCM or;
- Disclose how existing due diligence processes align with ICVCM's CCPs and continue to use their existing contacted carbon credit streams in place of CCP approved credits by adhering to the guidance below.

CORSIA eligible credits, or pre-existing contractually committed credits supported by due diligence process alignment to all 10 CCP's, will be accepted as an interim measure until the ICVCM Assessment Framework is implemented. Companies shall transition to purchase and retire CCP approved credits only by January 1, 2026. In the interim, companies should refer to the transition disclosures requirements outlined below.

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must annually publicly disclose the number of CCP approved credits purchased and retired that the company applied towards the VCMI Claim. If a company is already contractually committed to purchasing carbon credits not approved by CCP, or if CCP-Approved credits are unavailable, the company:

- May purchase and retire credits included in the ICAO document CORSIA Eligible Emission Units approved for the 2021-2023 Compliance Period (Pilot Phase) or the 2024-2026 Compliance Period (First Phase), pending assessment by the ICVCM. Once an activity type has been assessed by the ICVCM, only CCP-approved credits shall be purchased and retired. Any CORSIA Eligible Emission Units retired before assessments are made by the ICVCM for a given activity type will contribute toward meeting a VCMI Claim in a given year.
- May disclose, for pre-existing contractually committed credits, how existing due diligence processes align with ICVCM's CCPs. For VCMI Claims made prior to January 1, 2026, to satisfy the VCMI Claims Code, companies may disclose how their due diligence process for identifying credits of sufficient quality and integrity aligns with all the 10 CCPs, (e.g. Company XYZ's due diligence process for carbon credits purchased aligns with principles 1-10 by assessing ....). If the company's due diligence process does not incorporate all 10 of the CCPs, the company cannot make a VCMI Claim. This public disclosure

- will need to take the form of a statement included in a company's annual or sustainability report, or any other company controlled public disclosure method.
- Shall have transitioned to purchasing and retiring CCP-Approved credits only for VCMI Claims made on or after January 1, 2026,<sup>9</sup> to satisfy the VCMI Claims Code. As of this date, no further public disclosure of alignment to the 10 CCPs will be accepted.

Limited assurance over this metric may be required in the future to align with the upcoming regulatory disclosure frameworks. However, VCMI does not currently require third party assurance over this information.

Should changes within FC1 (calculation of scopes 1, 2, and 3) occur that require recalculation of this metric, then the recalculation should be made and publicly disclosed.

#### **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within question C11.2a: "Provide details of the project-based carbon credits canceled by your company in the reporting year." Submission of CDP Climate Change questionnaire responses would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

This metric can be found within section 36 (e) of the most up to date <u>IFRS S2 standards</u>. Additionally, companies that have a science-aligned target will be encouraged to disclose carbon credits which are sourced from outside the company's value chain as stated in the most up to date <u>SBTi Corporate Manual</u>.

Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date, and issuing registry for each credit used

#### VCMI REQUIREMENTS

To satisfy the VCMI Claims Code, companies must publicly disclose these metrics annually.

#### COMPLEMENTARY REPORTING

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

9 VCMI reserves the right to revise this date, subject to changes in the availability of CCP-Approved carbon credits. Any revisions to this date will have no effect on the validity of pre-existing VCMI Claims.

#### Metric 3.3: Host country

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric (name of host country) annually for each project that generated any credit used.

#### **COMPLEMENTARY REPORTING**

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

#### Metric 3.4: Credit vintage

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric (credit vintage) annually.

#### COMPLEMENTARY REPORTING

Companies that have responded to the CDP Climate Change Questionnaire will have already disclosed this metric within question C11.2a: "Provide details of the project-based carbon credits canceled by your organization in the reporting year."

This metric is not directly applicable within the SBTi, IFRS, GRI, or TCFD frameworks.

#### Metric 3.5: Methodology

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric (the methodology used for the quantification of the carbon credit) annually.

#### **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have disclosed this metric within question C11.2a: "Provide details of the project-based carbon credits canceled by your organization in the reporting year."

This metric is not directly applicable within the SBTi, IFRS, GRI, or TCFD frameworks.

#### Metric 3.6: Project type

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric annually. Companies must disclose whether the credits are from emissions reduction or removal projects.

#### **COMPLEMENTARY REPORTING**

Companies that have responded to the CDP Climate Change Questionnaire will have disclosed this metric within question C11.2a stating "Provide details of the project-based carbon credits canceled by your organization in the reporting year."

This metric is not directly applicable within the SBTi, IFRS, GRI, or TCFD frameworks.

## Metric 3.7: Host country authorization

#### **VCMI REQUIREMENTS**

Host countries provide authorization for GHG mitigation outcomes towards an acquiring party's <u>Nationally Determined Contributions (NDCs)</u>, international mitigation purposes, and/or other purposes to apply corresponding adjustments, in order to avoid double counting under Article 6 of the Paris Agreement. Please note that companies are not required to provide a letter of authorization or any supporting evidence demonstrating host country authorization for VCMI Claims purposes. This exemption is in place due to the limited accessibility for buyers to obtain a letter of authorization and the ongoing development of the host country authorization process. To satisfy the VCMI Claims Code, companies must publicly disclose whether they have received host country authorization annually.

A specific set of standards for this metric is not applicable.

#### COMPLEMENTARY REPORTING

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

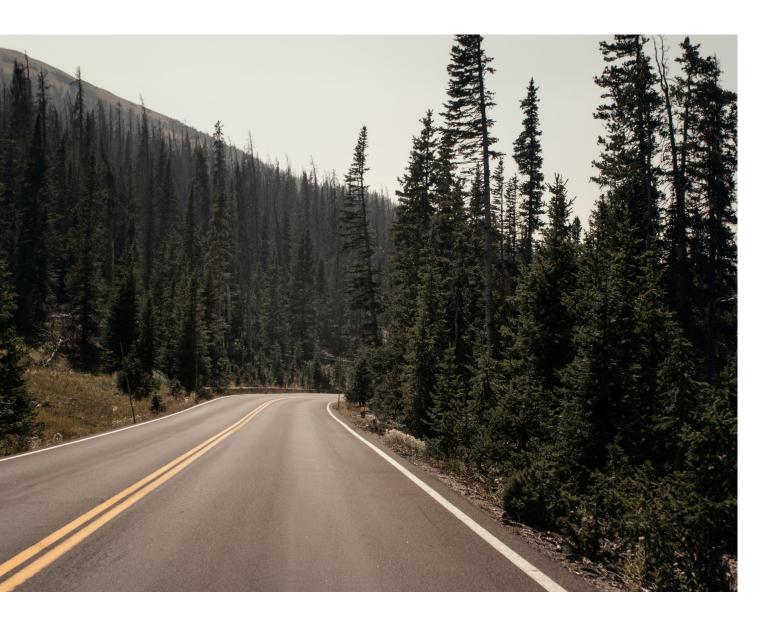
# Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity companies must provide information related to how the credit promotes equity and generates cobenefits to ecosystems and local economies

#### **VCMI REQUIREMENTS**

To satisfy the VCMI Claims Code, companies must publicly disclose this metric annually.

#### **COMPLEMENTARY REPORTING**

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.



# Step 4: Obtain third-party assurance of reported information following the VCMI Monitoring, Reporting, and Assurance Framework

Companies must submit the information below to the <u>VCMI Claims Reporting Platform</u> as the final step in making a VCMI Claim:

# Metric 4.1: Name of assurance provider

The name of the assurance provider should reflect the organization that conducted assurance over the metrics identified as requiring assurance in the MRA Framework. Available assurance providers can be found via the following links:

- <u>Auditing Standards Board (ASB)/AICPA</u>: The following is a link to the AICPA's website that companies may use to identify an assurance provider: <a href="https://us.aicpa.org/forthepublic/findacpa">https://us.aicpa.org/forthepublic/findacpa</a>
- International Auditing and Assurance Standards Board (IAASB):

  The following is a link to the International Federation of Accountants website that companies may use to identify an assurance provider:

  https://www.ifac.org/who-we-are/membership
- International Organization for Standardization (ISO): The following is a link to the ISO's website that companies may use to identify an assurance provider: ISO Certification

# Metric 4.2: Name of assurance standards

The name of the assurance standard is specific to the standard that was utilized during the assurance engagement. A list of accepted standards are listed in <u>Table 1</u>: Assurance bodies and related standards.

# Metric 4.3: Level of assurance per key metric for assurance

The level of assurance per key metric refers to whether limited or reasonable assurance was provided by the assurance provider. Please refer to <u>Appendix A: Evidence checklist for companies</u> to identify which metrics must be assured in order to obtain a VCMI Claim.

# Metric 4.4: Period covered by assurance

Period covered by assurance refers to the date range of the data for which assurance was obtained as well as the specific date that the assurance report was provided.

Please see <u>Section 3</u> for a step-by-step guide on how to submit assurance provider information within the VCMI Claims Reporting Platform.

Submission of CDP Climate Change questionnaire responses regarding assurance received would be sufficient as evidence of public disclosure, assuming public disclosure of CDP submission was selected.

## Box 1: Scope 3 Flexibility Claim

The Scope 3 Flexibility Claim is intended for companies that meet the Foundational Criteria but are not able to fully meet their scope 3 emission reduction targets, and so wish to bridge the gap between their emissions in any given year and the expected scope 3 target level for that same year.



VCMI has released a beta version of the Scope 3 Flexibility Claim for review and further development; therefore companies are not yet able to make this Claim. VCMI has developed a roadmap for releasing a final version of this claim in 2024. More information is available below, and further detailed on the VCMI website.

#### Requirements for companies making a Scope 3 Flexibility Claim

As detailed within the Scope 3 Flexibility Claim Beta, companies making this claim are required to:

- Comply with the Foundational Criteria;
- Make progress towards meeting scopes 1 and 2 emission reduction targets;
- Use high-quality carbon credits to bridge the gap between the most recently reported scope 3
  emissions and the expected scope 3 emissions for the same year, based on the level of emissions on
  a trajectory consistent with the company's science-aligned target (VCMI Claims Code Step 3). The
  sources of emissions included are those covered by the scope 3 target boundary and the company
  must observe the claim guardrails;
- Disclose all information required to conform with VCMI Claims Code Step 4 on obtaining third-party assurance.

Other criteria that must be applied:

- Use of credits to bridge a scope 3 emissions gap must not exceed a volume of 50% of a company's GHG inventory scope 3 emissions, within the target boundary, in the most recent reporting year;
- Use of credits to bridge an emissions gap must decline over time, leading to complete phaseout no later than 10 years after the first claim is made, or 2035, whichever is the earlier;

Scope 3 Flexibility Claim Metric 1: Target level emissions in the most recent reporting year

#### **VCMI REQUIREMENTS**

The company should annually disclose its estimated target level emissions for the year in which a Scope 3 Flexibility Claim is being made, based on the level of emissions on a trajectory consistent with the company's science-aligned target. Disclosing this metric is only required if the company has selected a VCMI Scope 3 Flexibility Claim.

The emissions trajectory reflects the level of emissions consistent with the company's science-aligned target and must be drawn from the date a company sets the target to its net zero target. Identification of the emissions trajectory allows the emissions gap for the reporting year to be estimated. Companies may choose to adopt GHG intensity-based targets for scope 3 emission reduction under SBTi and may vary significantly regarding the production unit used in the denominator. Target metrics can be set as GHG per unit of production value, per dollar revenue, per pound product, per item produced, etc. Intensity targets may be well suited to sectors and firms with production units that are simple and comparable, such as cement, basic metals, and electricity (WRI, 2006). Not all companies adopt intensity-based targets, but for those which are expanding and merging, it could be an effective way to manage emissions reductions, while absolute emissions may have increased.

Alternative credible pathway drawn by the company can be used and provided, if they relate to a more adequate, yet robust, emission reduction trajectory. If a company follows this option, it will need to provide information regarding the methodology and hypothesis used to build the trajectory and have it publicly disclosed on the company's website so that the method to develop the pathway can be assured.

#### COMPLEMENTARY REPORTING

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

Scope 3 Flexibility Claim Metric 2: Most recent reporting year scope 3 emissions gap

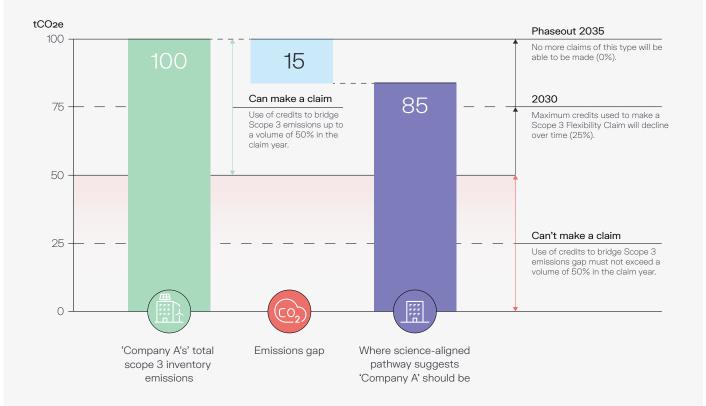
#### **VCMI REQUIREMENTS**

The company should annually disclose their emissions gap for the reporting year. Disclosing this metric is only required if the company has selected a VCMI Scope 3 Flexibility Claim.

The emissions gap is identified by comparing the most recently reported scope 3 emissions, and the expected scope 3 emissions for the same year, based on the level of emissions on a trajectory consistent with the company's science-aligned target. The sources of emissions included are those covered by the scope 3 target boundary and the company must observe the claim guardrails.

The emissions gap will be equal to the difference between reported scope 3 GHG inventory emissions as covered in the near-term target boundary and the scope 3 GHG emissions trajectory:

Emissions gap (t) = scope 3 GHG inventory (t) - scope 3 GHG trajectory (t)



#### **COMPLEMENTARY REPORTING**

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year

#### **VCMI REQUIREMENTS**

This metric is only required to be disclosed if the company has selected a VCMI Scope 3 Flexibility Claim. These claims are required to meet the threshold carbon credit use amounting to no more than 50% of a company's scope 3 inventory emissions in the year it is claiming for. The sources of emissions included are those covered by the scope 3 target boundary.

#### COMPLEMENTARY REPORTING

This metric is not directly applicable within the CDP Climate Change Questionnaire, SBTi, IFRS, GRI, or TCFD frameworks.

SECTION 3.

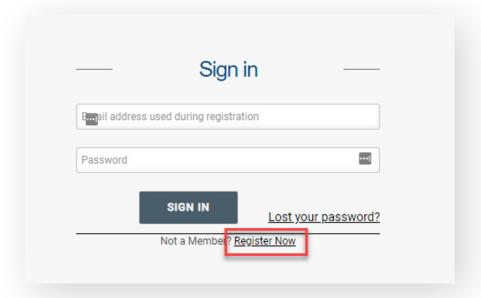
Guide to accessing the VCMI Claims Reporting Platform



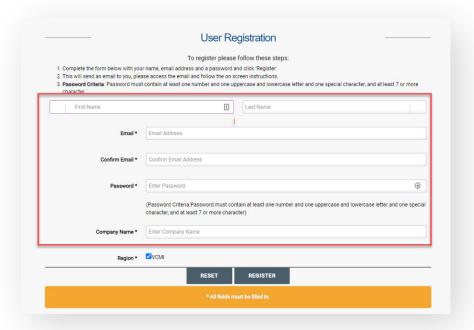
Follow the step-by-step instructions below to access the VCMI Claims Reporting Platform.

#### NEW COMPANY SIGN-UP / REGISTRATION

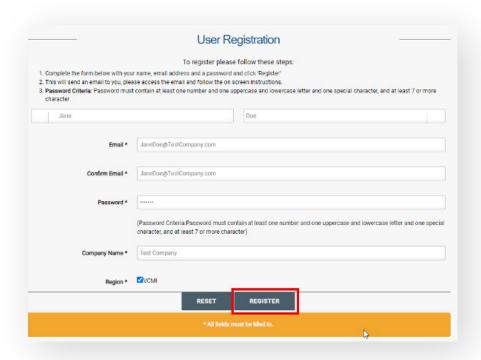
- 1. Navigate to the VCMI website <a href="https://vcmintegrity.org">https://vcmintegrity.org</a>.
- 2. In the top header of the website, click on the 'Reporting Platform' button.
- 3. Select "Register Now."



- 4. You will be directed to the new company registration screen. Complete the below fields:
  - a. First name
  - b. Last name
  - c. Email
  - d. Confirm email
  - e. Password
  - f. Company name



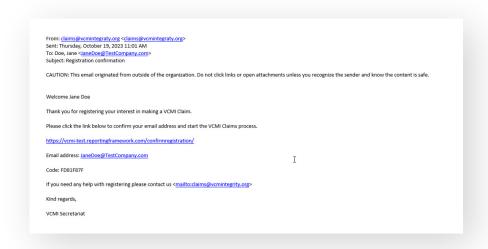
5. Select "Register" if fields are populated correctly or "Reset" to clear fields.



6. The message below will be displayed, indicating that you have successfully registered. Navigate to your inbox to activate your registration..



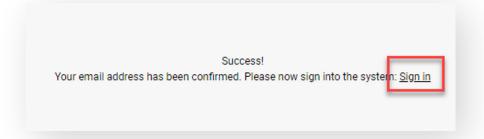
7. The message below will be sent to your email inbox. Please also check your junk email folder.



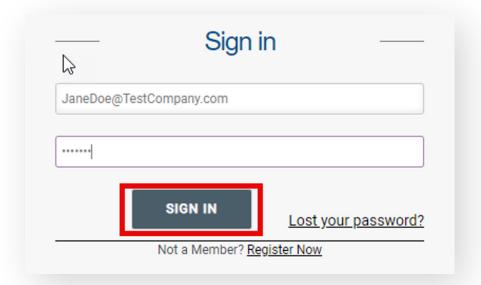
8. Click the e-mail confirmation link in the email to navigate to the VCMI Claims Reporting Platform and enter the email address and code provided in the email. Then select "Confirm."



9. The message shown below will appear. Click "Sign in."

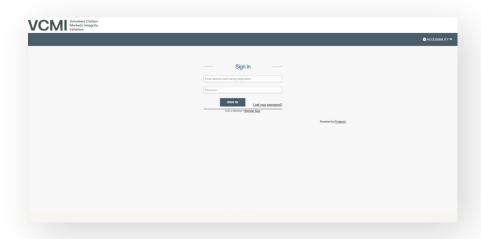


10. If not automatically populated, enter the email and password. Then click "Sign In."

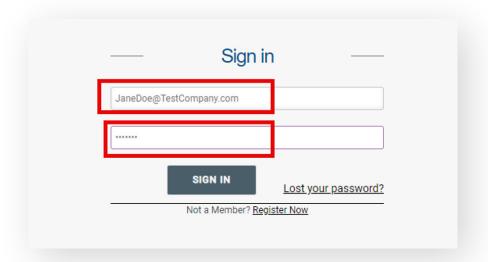


#### **RETURNING COMPANY SIGN-IN**

1. Access the sign-in VCMI Claims Reporting Platform at <a href="http://claims.vcmintegrity.org">http://claims.vcmintegrity.org</a> or via the VCMI website.



2. If not automatically populated, enter the email and password.

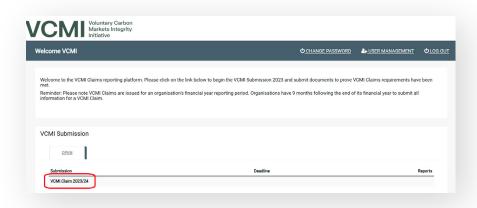


3. Click "Sign in."

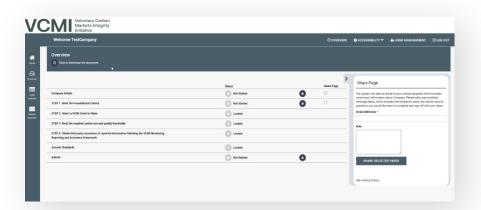


Once you have successfully accessed the VCMI Claims Reporting Platform, you can begin submitting the required documentation.

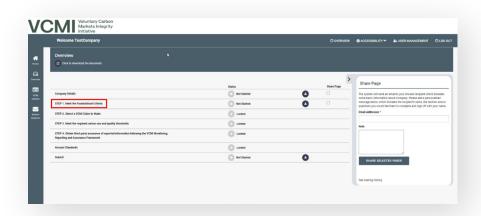
 Once logged in, the landing page below will be available. Select "VCMI Claims 2023/24" or the submission form applicable to the financial year you wish to make a VCMI claim for.



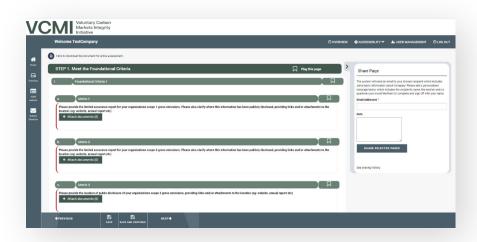
2. The submission form homepage will appear. Fill in company details in the 'Company Details' form at the top.



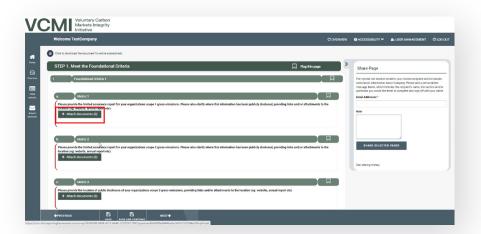
3. Then select "STEP 1. Meet the Foundational Criteria."



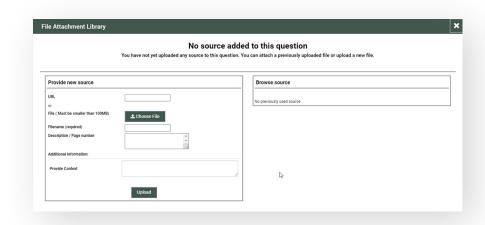
4. Questions relating to this key step will appear.



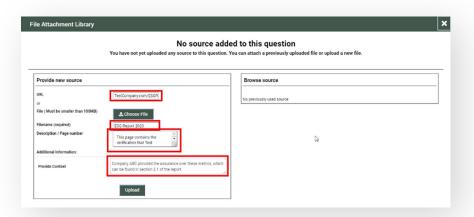
5. Provide your responses in the text box and select "Attach Documents".



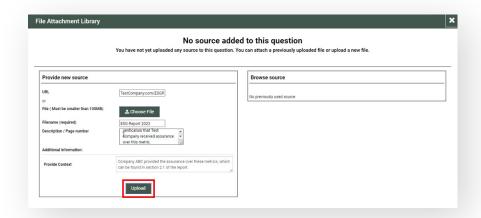
6. The "File Attachment Library" window will open.



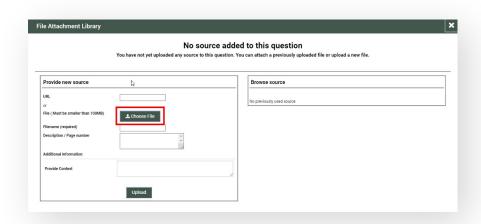
- 7. Provide either a website URL or PDF source for documentation.
  - a. Please note that website URLs will be automatically converted to PDF form.
  - b. If providing a URL, enter the URL that contains the relevant data and populate the below fields:
    - i. Filename
    - ii. Page number (required)
    - iii. Provide context/ description (optional)



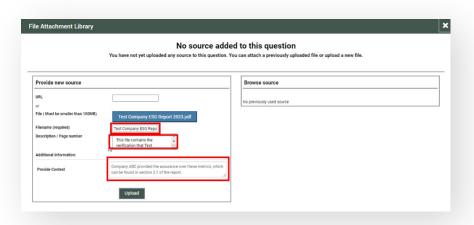
iv. Select "Upload."



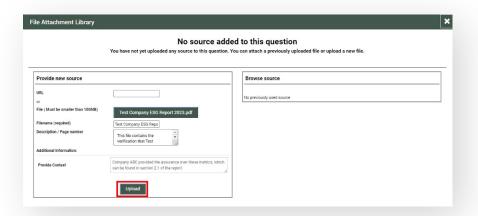
c. If providing a file, select "Choose File."



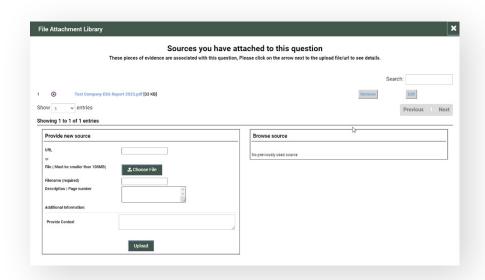
- d. Populate the below fields:
  - i. Filename
  - ii. Page number (required)
  - iii. Provide context (optional)



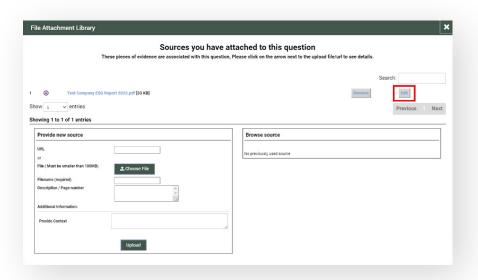
iv. Click "Upload."



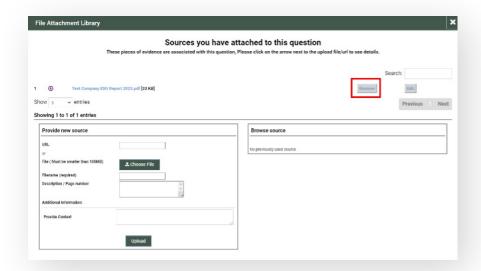
e. To add additional files, repeat the process as needed.



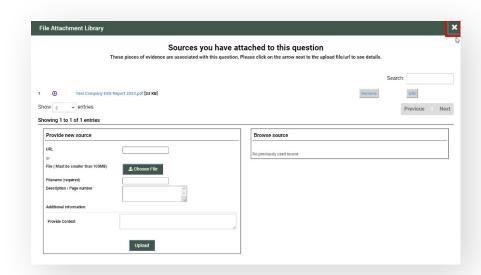
f. To edit a file, click the "Edit" box to the right of the file to be edited.



g. To remove a file, click the "Remove" box to the right of the file to be removed.



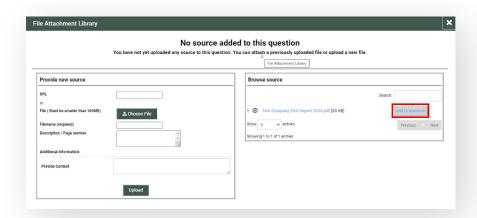
h. When done adding files, close the pop-up window.



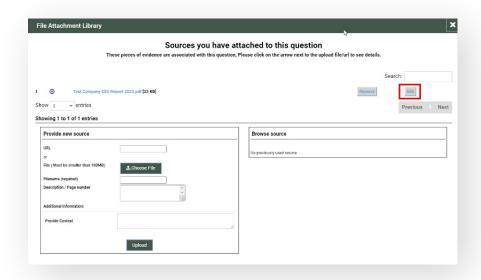
- 8. Repeat the steps as necessary for the remaining metrics listed under the key steps on the homepage.
  - a. To reference the same file for multiple metrics
    - i. Click on "Attach documents"



ii. Then click on "Add to question" for the file to be referenced.



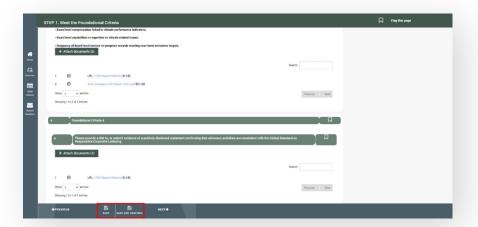
iii. The description of the file can be changed by selecting the "Edit" button. Changing a description on a file does not change the description for other instances of the same file.



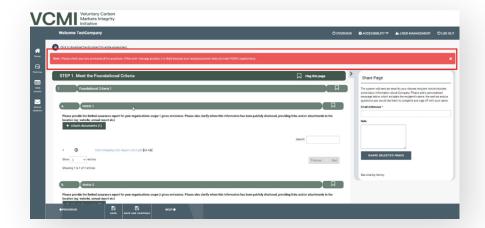
- 9. Note that some questions have a text box for entry of information.
  - a. Respond to the question using the text box and option to upload evidence by clicking on "Attach documents", as applicable.



10. Once all questions have been completed, select either "Save" or "Save and Continue" at the bottom of the page. An error message may appear if you have not provided responses to all questions, or if your response/s do not meet VCMI's requirements.



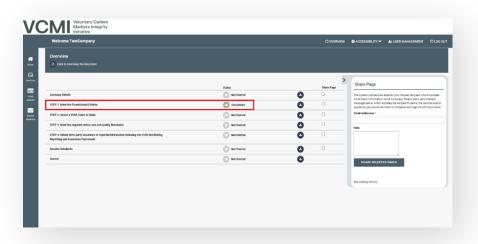
a. If the following error appears, it may be because a question was left unanswered.



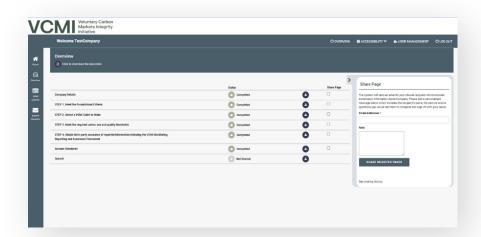
b. Unanswered questions will be marked with a red bracket on the left side of the screen.



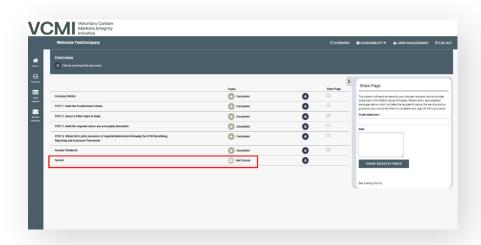
11. When a section of the survey is completed, it will be marked "completed" on the overview page.



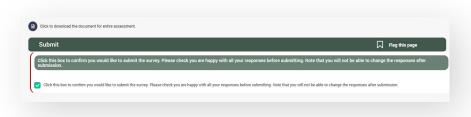
12. Fill out each section, ensuring each says "Complete."



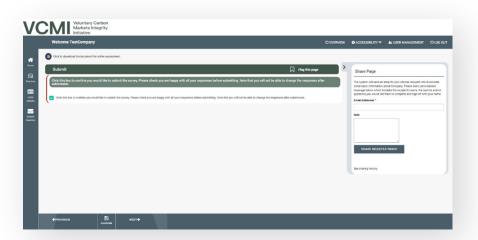
- 13. Submit the report.
  - a. Select the "Submit" section.



b. Check the box indicating that you would like to submit the survey.



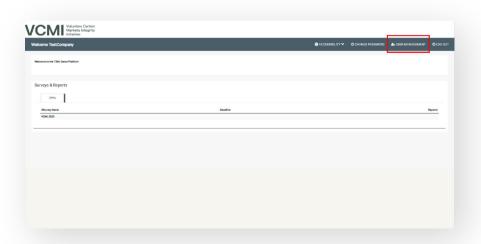
c. Click "Confirm" to submit the assessment.



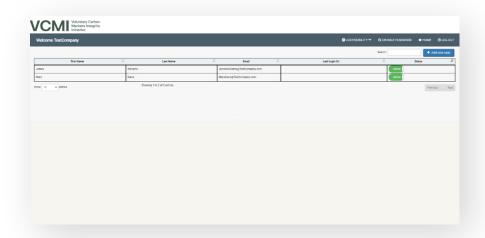
#### ADDING A USER

Companies may add users to the VCMI Claims reporting platform to assist with VCMI submission process.

1. From any page, click on "User Management" in the top right corner



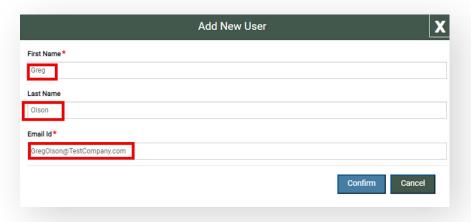
2. The page shown below will open, showing all the current super users, which are users who have unrestricted access to the VCMI Claims reporting platform.



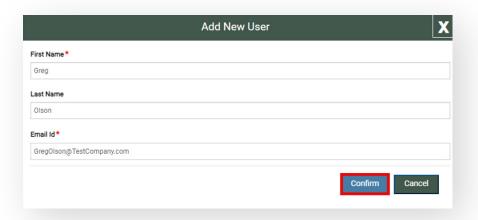
3. To add a new user, click on the "Add new user" button in the top right corner.



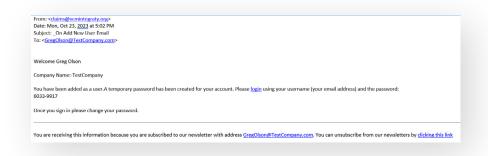
4. Populate the "First Name," "Last Name," and "Email ID" sections with the new user's information.



5. Click "Confirm."



6. The designated user will receive an email giving them access to the reporting platform.



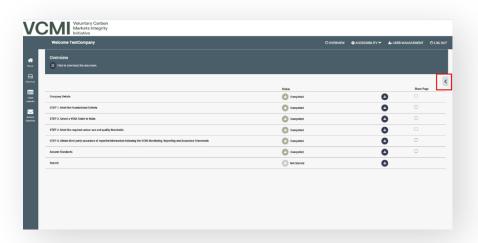
7. User access can be toggled by clicking on the "status" button.



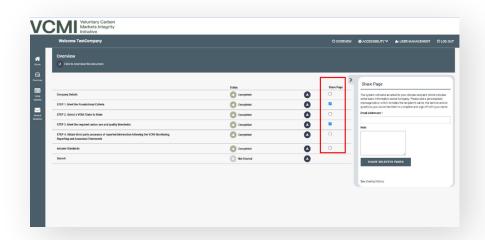
#### SHARING THE VCMI SURVEY

The sharing functionality within the submission homepage will share a specific section of the survey with the selected user. Any changes that are made by these users will appear as a draft and the main user / representative of the company will need to approve these changes before submitting the survey.

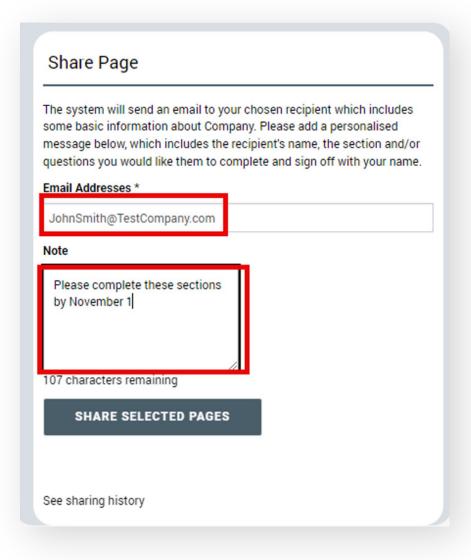
1. From the "Overview" page, click on the chevron on the right side of the screen to open the "share" menu, if it is not already open.



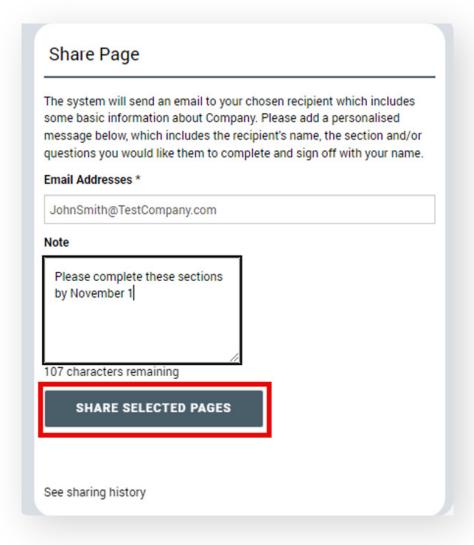
2. Select any sections that should be shared with a specific non-user.



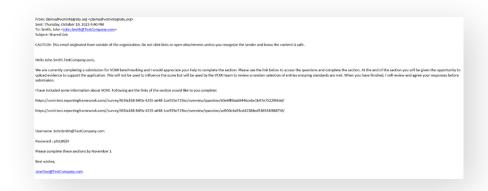
3. Enter the email of the non-user recipient and add any additional information to send to that person.



4. Click "Share selected pages."



5. The recipient will receive an email with a temporary username and password.

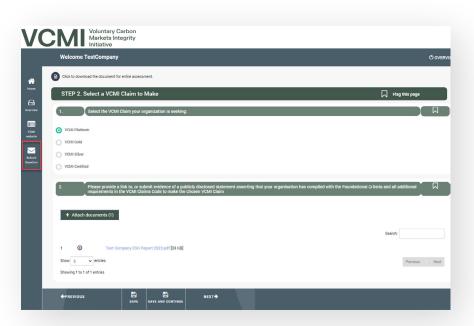


6. The user will only have access to selected sections.



#### **HELP**

If a question arises while submitting a VCMI Claim, use the "Submit Question" button on the left side of the screen, which opens an email addressed to the VCMI support team at <a href="mailto:claims@vcmintegrity.org">claims@vcmintegrity.org</a>.



#### VCMI CLAIMS BRANDING GUIDELINES

Once a company has submitted all relevant information on the VCMI Claims Reporting Platform, in line with the reporting and assurance requirements of this MRA Framework, it will receive an email confirming it has successfully obtained a Carbon Integrity Claim. This email will contain a link to VCMI branding assets and Branding Guidelines. Companies will be directed to where they can download a Carbon Integrity mark (Silver, Gold or Platinum) and will be able to use the mark in its communication materials, in line with the guidance provided in the <u>Carbon Integrity Branding Guidelines</u>.

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Glossary



Term	Definition			
Accredited	A process that companies can take part in to demonstrate their commitment to following the standards set for their organization (Better Business Bureau, 2023).			
Assurance	An engagement in which a practitioner seeks sufficient appropriate evidence to express a conclusion designed to enhance the degree of confidence of the intended users other than the responsible party about the subject matter information provided (ISAE 3000, 2000).			
Base year	A historic datum (a specific year or an average over multiple years) against which a company's emissions are tracked over time (GHG Protocol, 2004).			
Carbon credit	A tradeable unit issued by a carbon crediting program/standard that represents a verified reduction or removal of GHGs from the atmosphere equivalent to one metric tonne of $\mathrm{CO}_2$ e. Carbon credits are uniquely serialized, issued, tracked, and cancelled or retired by means of an electronic registry (VCMI Claims Code of Practice).			
Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)	A global market-based mechanism, adopted by the International Civil Aviation Organization (ICAO) in 2016, to address $\mathrm{CO}_2$ emissions from international aviation. CORSIA is the first global market-based measure for an individual sector. It pursues a cooperative approach, involving governments, industry, and international organizations, that attempts to replace a patchwork of national or regional regulatory initiatives. CORSIA aims to stabilize, from 2021, international civil aviation CO2 emissions at 2019 levels, including through the use of carbon credits that are determined by ICAO to meet the CORSIA Emissions Units Eligibility Criteria. (For additional information, see ICAO, 2021).			
Claim	A message used to describe or promote a product, process, business, or service with respect to its sustainability attributes or credentials (ISEAL, 2015).			
Core Carbon Principles (CCPs)	A global benchmark for high-integrity carbon credits that set rigorous thresholds on disclosure and sustainable development (ICVCM, 2023).			
Greenhouse Gas (GHG) Emissions	The release of the six gases listed in the Kyoto Protocol into the atmosphere. The gases are: carbon dioxide $(CO_2)$ ; methane $(CH4)$ ; nitrous oxide $(N2O)$ ; hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulfur hexafluoride (SF6) $(GHG Protocol, 2004)$ .			
Host country	In relation to carbon credits, the country where a project to reduce or remove emissions takes place (S&P Global).			
Independent	Independence comprises:  (a) Independence of mind – the state of mind that permits the expression of a conclusion without being affected by influences that compromise professional judgment, thereby allowing an individual to act with integrity, and exercise objectivity and professional skepticism.  (b) Independence in appearance – the avoidance of facts and circumstances that are so significant that a reasonable and informed third party would be likely to conclude that a firm's, or an audit or assurance team member's, integrity, objectivity, or professional skepticism has been compromised (IESBA, 2023).			

Term	Definition
Integrity Council for the Voluntary Carbon Market (ICVCM)	An independent governance body that is developing and enforcing a set of Core Carbon Principles (CCPs) that establishes a new threshold standard for high-quality carbon credits in the voluntary carbon market. The ICVCM will oversee a process to determine the Eligibility of carbon-crediting programs as well as which carbon credit Categories will become CCP-Approved. (For additional information, see <a href="ICVCM">ICVCM</a> , 2023)
Limited assurance	An assurance engagement in which the practitioner reduces engagement risk to a level that is acceptable in the circumstances of the engagement but where that risk is greater than for a reasonable assurance engagement as the basis for expressing a conclusion in a form that conveys whether, based on the procedures performed and evidence obtained, a matter(s) has come to the practitioner's attention to cause the practitioner to believe the subject matter information is materially misstated (ISAE, 2013).
Mitigation	A human intervention to reduce emissions or enhance the sinks of GHG (UNFCCC, 2009).
Reasonable assurance	An assurance engagement in which the practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the practitioner's conclusion. The practitioner's conclusion is expressed in a form that conveys the practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria (ISAE, 2013).
Retirement of carbon credits	The transfer to a retirement account or the cancellation of a carbon credit. Once retired, the credit is considered 'used' and cannot be counted again toward a climate target. The owner of the retired credit can accurately claim to have reduced emissions and use those emissions to meet its climate commitments (VCMI Claims Code, 2023).
Science-aligned target	A target that is in line with the latest climate science consensus on safe upper limits for global warming. Alignment with an IPCC model pathway of ${\rm CO_2}$ emission reductions that limits global warming to 1.5 degrees Celsius with no or limited overshoot is the ultimate objective (SBTi, 2023). 'Science-based' is used when adhering to SBTi's standards, while 'science-aligned' may not necessarily follow SBTi's standards.
Scope 1	Emissions from operations that are owned or controlled by the reporting company. (VCMI Claims Code, 2023).
Scope 2	Emissions from the generation of purchased or acquired electricity, steam, heating, or cooling consumed by the reporting company (VCMI Claims Code, 2023).
Scope 3	Indirect emissions that occur in the value chain of the reporting company, including both upstream and downstream emissions (VCMI Claims Code, 2023).
Vintage	In relation to carbon credits, the year in which the emission reduction or removal took place. The verification process can take two to three years from project inception, so projects may generate credits for already-reduced emissions. (For additional information, see <u>Gold Standard</u> , 2023).
Voluntary carbon market	A marketplace that encompasses transactions of carbon credits that are not purchased with the intention to surrender into an active regulated carbon market. It includes carbon credits purchased with the intent to resell or retire to meet carbon neutral or other environmental claims (VCMI Claims Code, 2023).

Appendix A: Evidence checklist for companies



## Appendix A: Evidence checklist for companies

The checklist below aligns with the metrics found within Appendix B: Summary of Key Metrics and can be used to guide a company's data collection and ensure adherence to steps 1-4 of the VCMI Claims Code. Once all evidentiary documentation has been collected in alignment with the MRA Framework, the company can submit the required documentation to the VCMI Claims Reporting Platform. This platform allows companies to submit the information required to attain a VCMI Claim, in a structured and coordinated manner. For easy-to-use instructions on accessing the platform, refer to Section 3 above.

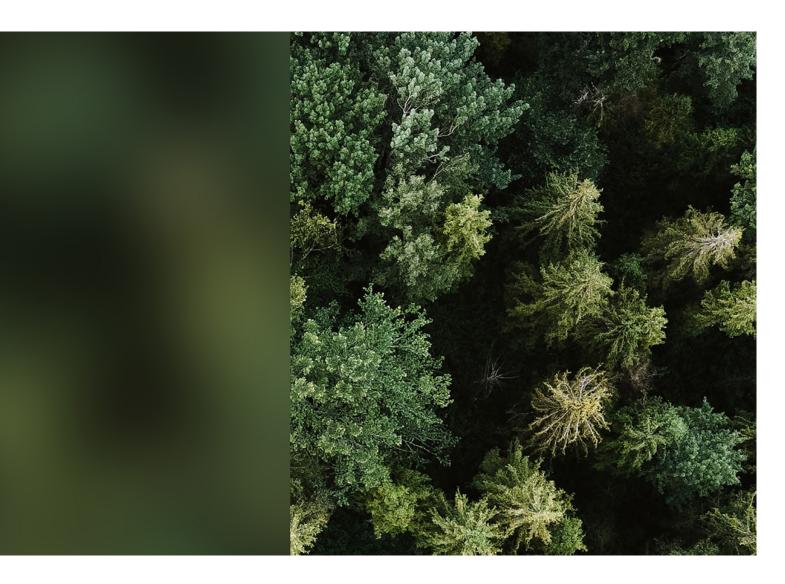
Criterion	Metric	Evidentiary Documentation	Public disclosure examples
FC1	Metric 1.1: Gross scope 1 GHG emissions in metric tonnes of $\mathrm{CO}_2$ equivalent for the base year and most recent reporting year	Limited assurance report and public disclosure reference	Companies may report their inventory through any of the following formats:
FC1	Metric 1.2: Gross scope 2 GHG emissions in metric tonnes of $\mathrm{CO}_2$ equivalent for the base year and most recent reporting year	Limited assurance report and public disclosure reference	CDP Climate Disclosure     Annual ESG, sustainability or GHG emissions report
FC1	Metric 1.3: Gross scope 3 GHG emissions in metric tonnes of ${\rm CO_2}$ equivalent by category for the base year and most recent reporting year	Public disclosure reference	<ul> <li>Annual financial statements or Proxy Statement</li> <li>Global Reporting Index (GRI) disclosure that includes GRI 305-1, 305-2, and 305-3</li> </ul>
FC1	Metric 1.4: A list of scope 3 GHG categories included and excluded, with justification of exclusion, for the base year and reporting year	Public disclosure reference	<ul> <li>Sustainable Accounting Standards Board (SASB) index</li> </ul>
FC1	Metric 1.5: An explanation for any base year recalculations	Limited assurance report for scopes 1 and 2 recalculations and public disclosure reference for all recalculations	
FC2	Metric 1.6: Near-term emission reduction target base year	For companies with SBTi validated near-term targets, public disclosure reference of SBTi validated targets	Companies may disclose targets through any of the following formats:
FC2	Metric 1.7: Near-term emission reduction target year	For companies without SBTi validated near-term targets, evidence of SBTi	CDP Climate Disclosure     Annual ESG, sustainability or GHG emissions report
FC2	Metric 1.8: Near-term emission reduction target boundary	Commitment Letter and public disclosure reference of near-term emission reduction targets	<ul><li>Annual financial statements or Proxy Statement</li><li>SBTi target dashboard</li></ul>
FC2	Metric 1.9: Near-term emission reduction target ambition		
FC2	Metric 1.10: Has near-term emission reduction target been validated by SBTi?	Public disclosure reference	
FC2	Metric 1.11: Date long-term net zero commitment was made	Public disclosure reference	
FC2	Metric 1.12: Long-term net zero definition	Public disclosure reference	

Criterion	Metric	Evidentiary Documentation	Public disclosure examples
FC3	Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain     Metric 1.14: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) made during the most recent reporting year dedicated to GHG mitigation across the company's value chain     Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation	Public disclosure reference	Companies may report their inventory through any of the following formats:  CDP Climate Disclosure <sup>10</sup> Annual ESG, sustainability or GHG emissions report  Annual report 10-K) or Proxy Statement  Global Reporting Index (GRI) disclosure that includes GRI 305-1, 305-2, and 305-3  Sustainable Accounting Standards Board (SASB) index  Publicly disclosed governance and investor relations materials including
FC3	Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain     Metric 1.17: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that will be dedicated to GHG mitigation across the company's value chain      Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.	Public disclosure reference	charters, policies, press releases, earnings call transcripts and investor presentations
FC3	Metric 1.15: Definition of CAPEX and OPEX  This metric must be disclosed only if the company selected to disclose metric 1.4 or 1.7 as listed above	Public disclosure reference	
FC3	Metric 1.19: Companies shall state if they have any of the following metrics:  Board or senior management level compensation linked to climate performance indicators  Board or senior management level capabilities or expertise on climate related issues  Frequency of Board-level reviews on progress towards meeting near-term emissions reduction targets	Public disclosure reference	
FC4	Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement	Public disclosure reference of statement describing how advocacy activities are consistent with the goals of the Paris Agreement or a statement confirming the company does not engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate	Companies may report their public policy advocacy activities through any of the following formats:  CDP Climate Disclosure  Annual ESG, sustainability or GHG emissions report  Publicly disclosed governance and investor relations materials including charters, policies, press releases, earnings call transcripts and investor presentations

<sup>10</sup> CDP Climate Disclosure is only applicable to FC3 Metrics 2, 3 and 8. FC3 Metrics 1, 4, and 7 are not aligned with the CDP Climate Change questionnaire.

Criterion	Metric	Evidentiary Documentation	Public disclosure examples
	Metric 2.1: VCMI Claim	Public disclosure reference	Companies may report their inventory through any of the following formats:
	Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code	Public disclosure reference	<ul> <li>Annual ESG, sustainability or GHG emissions report</li> <li>Publicly disclosed governance and investor relations materials including charters, policies, press releases, earnings call transcripts and investor presentations</li> </ul>
Step 2	Metric 2.3: The percentage of total GHG emissions reductions achieved in the most recent reporting year (in absolute or intensity terms) compared to the base year	Public disclosure reference	Companies may report their GHG emissions reductions through any of the following formats:
Step 2	Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers itself to have made progress towards meeting its near-term emission reduction target	Public disclosure reference	<ul> <li>Annual ESG, sustainability or GHG emissions report</li> <li>Publicly disclosed governance and investor relations materials including charters, policies, press releases, earnings call transcripts and investor presentations</li> </ul>
Step 3	Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim	Public disclosure reference and evidence of retirement from the carbon credit registry	Companies may report their credits purchased and retired through any of the following formats:  • Annual ESG, sustainability or GHG emissions report  • Annual financial statements or Proxy Statement
Step 3	Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date, and issuing registry for each credit used	Public disclosure reference	Companies may report the details of their carbon credits through any of the following formats:  • Annual ESG, sustainability or
Step 3	Metric 3.3: Host country	Public disclosure reference	GHG emissions report  • Annual financial statements or Proxy Statement
Step 3	Metric 3.4: Credit vintage	Public disclosure reference	
Step 3	Metric 3.5: Methodology	Public disclosure reference	
Step 3	Metric 3.6: Project type	Public disclosure reference	
Step 3	Metric 3.7: Host country authorization	Public disclosure reference	
Step 3	Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity companies must provide information related to how the credit promotes equity and generates co-benefits to ecosystems and local economies	Public disclosure reference	

Step 4	Metric 4.1: Name of assurance provider	Public disclosure reference	Companies may report their inventory through any of the following formats:
Step 4	Metric 4.2: Name of assurance standard	Public disclosure reference	<ul> <li>CDP Climate Disclosure</li> <li>Annual ESG, sustainability or GHG emissions report</li> </ul>
Step 4	Metric 4.3: Level of assurance	Public disclosure reference	<ul> <li>Annual financial statements or Proxy Statement</li> </ul>
Step 4	Metric 4.4: Period covered by assurance	Public disclosure reference	
Scope 3 Flexibility Claim	Scope 3 Flexibility Claim Metric 1: Target level emissions in the most recent reporting year	Public disclosure reference	Companies may report their emissions trajectory and gaps through any of the following formats:
	Scope 3 Flexibility Claim Metric 2: Most recent reporting year scope 3 emissions gap	Public disclosure reference	<ul> <li>Annual ESG, sustainability or GHG emissions report</li> <li>Publicly disclosed</li> </ul>
	Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year	Public disclosure reference	governance and investor relations materials including charters, policies, press releases, earnings call transcripts and investor presentations



Appendix B: Summary of key metrics

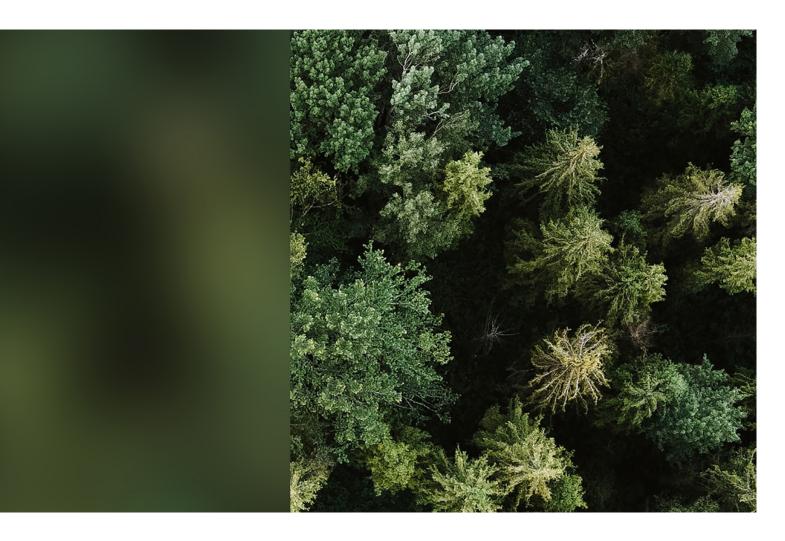


### Appendix B: Summary of key metrics

Topic	Metric	Category	Unit of Measure
Foundational Criterion  1: Maintain and publicly	<b>Metric 1.1:</b> Gross scope 1 GHG emissions in metric tonnes of CO <sub>2</sub> equivalent for the base year and most recent reporting year	Quantitative	Metric tonnes of CO <sub>2</sub> equivalent
disclose an annual greenhouse gas emissions inventory		Quantitative	Metric tonnes of CO <sub>2</sub> equivalent
	Metric 1.3: Gross scope 3 GHG emissions in metric tonnes of ${\rm CO}_2$ equivalent by category for the base year and most recent reporting year	Quantitative	Metric tonnes of CO <sub>2</sub> equivalent
	Metric 1.4: A list of scope 3 categories included and excluded, with justification of exclusion, for the base year and reporting year	Discussion and analysis	N/A
	Metric 1.5: An explanation for any base year recalculations	Discussion and analysis	N/A
Foundational Criterion	Metric 1.6: Near-term emission reduction target base year	Quantitative	Year
2: Set and publicly disclose science-	Metric 1.7: Near-term emission reduction target year	Quantitative	Year
aligned near-term emissions reduction targets, and publicly	Metric 1.8: Near-term emission reduction target boundary	Discussion and analysis	N/A
commit to reaching net zero emissions no later	Metric 1.9: Near-term emission reduction target ambition	Quantitative	Degrees Celsius
than 2050	<b>Metric 1.10:</b> Has near-term emission reduction target been validated by SBTi?	Quantitative	N/A
	Metric 1.11: Date long-term net zero commitment was made	Quantitative	Year and Month
	Metric 1.12: Long-term net zero definition	Discussion and analysis	N/A
Foundational Criterion 3: Demonstrate that the company is making	Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain	Quantitative	Percentage (%)
progress on financial allocation, governance and strategy towards meeting its near-term	Metric 1.14: The percentage of CAPEX and OPEX made during the most recent reporting year dedicated to GHG mitigation across the company's value chain	Quantitative	Percentage (%)
emission reduction target	Metric 1.15: Definition of CAPEX and OPEX	Discussion and analysis	N/A
	Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain	Quantitative	Percentage (%)
	Metric 1.17: The percentage of CAPEX and OPEX planned to be dedicated to GHG mitigation across the company's value chain	Quantitative	Percentage (%)
	Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation	Discussion and analysis	N/A
	Metric 1.19: Companies shall state if they have any of the following metrics:  Board or senior management level compensation linked to climate performance indicators; or	Discussion and analysis	N/A
	Board or senior management level capabilities or expertise on climate related issues; or		
	<ul> <li>Frequency of Board-level reviews on progress towards meeting near-term emission reduction targets.</li> </ul>		

Foundational Criterion 4: Demonstrate that the company's public policy advocacy supports the goals of the Paris Agreement and does not represent a barrier to ambitious climate regulation	Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement	Discussion and analysis	N/A
Step 2: Select a VCMI Claim to make	Metric 2.1: VCMI Claim (Carbon Integrity Silver / Gold / Platinum)	Discussion and analysis	N/A
	Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code	Discussion and analysis	N/A
	Metric 2.3: Percentage of total GHG emissions reductions achieved in the most recent reporting year (in absolute or intensity terms) compared to the base year	Quantitative	Percentage (%)
	Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers itself to have made progress towards meeting its near-term emission reduction target	Discussion and analysis	N/A
Step 3: Meet the required carbon credit use and quality thresholds	Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim (These may be initially CORSIA label credits, and once the ICVCM Assessment Framework is implemented, companies shall transition to purchase and retire CCP-Approved credits).  Alternatively, if a company already has contractually committed to purchasing credits not approved by CCP, or CCP-Approved credits are unavailable, the company can follow the transition guidance, until January 1, 2026, after whichonly CCP-Approved credits will be eligible for VCMI Claims	Quantitative	Number
	Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date and issuing registry for each credit used	Discussion and analysis	N/A
	Metric 3.3: Host country	Discussion and analysis	N/A
	Metric 3.4: Credit vintage	Discussion and analysis	N/A
	Metric 3.5: Methodology	Discussion and analysis	N/A
	Metric 3.6: Project type	Discussion and analysis	N/A
	Metric 3.7: Host country authorization	Discussion and analysis	N/A
	Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity (e.g., SDGs label, SD Vista, Climate, Community and Biodiversity Standards, etc.), companies must provide information related to how the credit promotes equity and generates co-benefits to ecosystems and local economies	Discussion and analysis	N/A
Step 4: Obtain third- party assurance of	Metric 4.1: Name of assurance provider	Discussion and analysis	N/A
reported information following the VCMI Monitoring, Reporting	Metric 4.2: Name of assurance standard	Discussion and analysis	N/A
and Assurance Framework	Metric 4.3: Level of assurance	Discussion and analysis	N/A
	Metric 4.4: Period covered by assurance	Quantitative	Dates

Scope 3 Flexibility Claim	Scope 3 Flexibility Claim Metric 1: target level emissions in the most recent reporting year	Quantitative	Metric tonnes of CO <sub>2</sub> equivalent
	Scope 3 Flexibility Claim Metric 2: Most recent reporting year scope 3 emissions gap	Quantitative	Metric tonnes of CO <sub>2</sub> equivalent
	Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year	Quantitative	Metric tonnes of CO <sub>2</sub> equivalent



Appendix C:
Timing
considerations
for disclosure
of key metrics



# Appendix C: Timing considerations for disclosure of key metrics

The following table illustrates the frequency in which VCMI metrics must be disclosed. Within the first year of making a VCMI Claim, all metrics must be publicly disclosed and are subject to their respective levels of disclosure as outlined throughout the MRA Framework. To minimize the reporting burden, metrics that are not likely to change yearly are not required to be re-disclosed on an annual basis as illustrated below.

Key: Required Not required See text

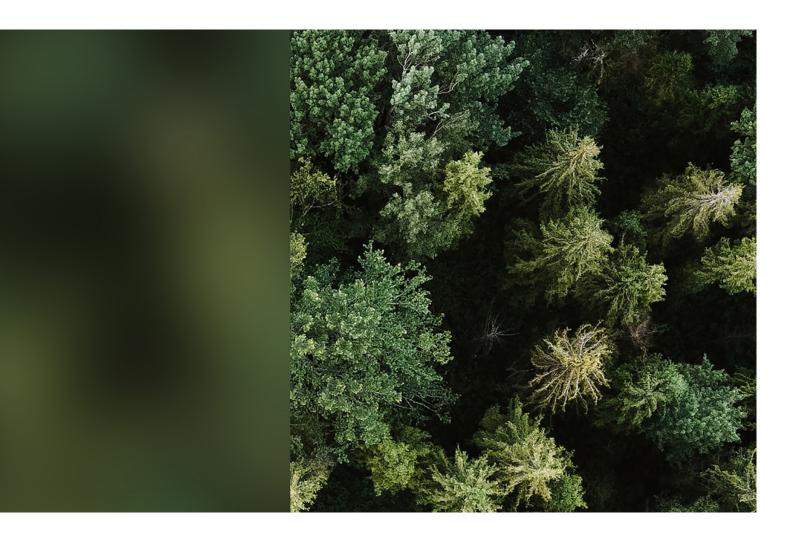
VCMI Metric	Initial year disclosure	Annual disclosure	Other timing considerations
Step 1: Foundation	al Criterion 1		
	YES	YES	N/A
	YES	YES	N/A
$ \begin{tabular}{ll} \textbf{Metric 1.3:} Gross scope 3 GHG emissions in metric tonnes of CO_2 \\ equivalent by category for the base year and most recent reporting year \\ \end{tabular} $	YES	YES	N/A
Metric 1.4: A list of scope 3 categories included and excluded, with justification of exclusion, for the base year, and reporting year	YES	YES	N/A
Metric 1.5: An explanation for any base year recalculations	YES	NOT REQUIRED	Required on an as-needed basis
Step 1: Foundation	al Criterion 2		
Metric 1.6: Near-term emission reduction target base year	YES	NOT REQUIRED	Required as and when the next near-term target is developed
Metric 1.7: Near-term emission reduction target year	YES	NOT REQUIRED	Required as and when the next near-term target is developed
Metric 1.8: Near-term emission reduction target boundary	YES	NOT REQUIRED	Required as and when the next near-term target is developed
Metric 1.9: Near-term emission reduction target ambition	YES	NOT REQUIRED	Required as and when the next near-term target is developed
Metric 1.10: Has near-term target been validated by SBTi?	YES	NOT REQUIRED	Required to be updated, assuming a 24-month period was used <sup>11</sup>
Metric 1.11: Date long-term net zero commitment was made	YES	NOT REQUIRED	N/A
Metric 1.12: Long-term net zero definition	YES	NOT REQUIRED	N/A
Step 1: Foundation	al Criterion 3		
Companies shall select the disclosure of at least one of the follo made during the most rec			owards GHG mitigation
<ul> <li>Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain</li> <li>Metric 1.14: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) made during the most recent reporting year dedicated to GHG mitigation across the company's value chain</li> <li>Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG</li> </ul>	YES, if chosen as desired disclosure	YES, if chosen as desired disclosure	N/A
mitigation			

For companies that have not received SBTi validation over their near-term targets, a 24-month period will be allowed if evidence of commitment to SBTi is provided. The 24-month period to set science-based targets is in line with the SBTi's requirement. The evidence of commitment to SBTi must be dated in advance of the date for which intent to obtain a VCMI Claim was established.

VCMI Metric Initial year Annual Other timing disclosure disclosure considerations

Companies shall select the disclosure of at least one of the follow	ing regarding plan	ned financial alloc	ation to GHG mitigation:	
<ul> <li>Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain</li> <li>Metric 1.17: The percentage of capital expenditure (CAPEX) and operational expenditures (OPEX) that will be dedicated to GHG mitigation across the company's value chain</li> <li>Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and provide a qualitative description and analysis of investments made, and steps taken related to GHG mitigation</li> </ul>	YES, if chosen as desired disclosure	YES, if chosen as desired disclosure	N/A	
Metric 1.15: Definition of CAPEX and OPEX	YES, if metric 1.4 or 1.7 is chosen	YES, if metric 1.4 or 1.7 is chosen	AL / A	
This metric must be disclosed only if the company selected to disclose metric 1.14 or 1.17 as listed above	as desired disclosure	as desired disclosure	N/A	
Metric 1.19: Companies shall state if they	have any of the f	ollowing metrics:		
Board or senior management level compensation linked to climate performance indicators	YES	YES	N/A	
Board or senior management level capabilities or expertise on climate related issues	YES	YES	N/A	
Frequency of Board-level reviews on progress towards meeting near-term emission reduction targets	YES	YES	N/A	
Step 1: Foundation	al Criterion 4			
Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement	YES	YES	N/A	
Step 2	2			
Metric 2.1: VCMI Claim	YES	YES	N/A	
Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code	YES	YES	N/A	
Metric 2.3: The percentage of total GHG emissions reductions achieved in the most recent reporting year (in absolute or intensity terms) compared to the base year	YES	YES	N/A	
Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers itslef to have made progress towards meeting its near-term emission reduction target	YES	YES	N/A	
Step 3	3			
Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim	YES	YES	N/A	
Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date, and issuing registry for each credit used	YES	YES	N/A	
Metric 3.3: Host country	YES	YES	N/A	
Metric 3.4: Credit vintage	YES	YES	N/A	
Metric 3.5: Methodology	YES	YES	N/A	
Metric 3.6: Project type	YES	YES	N/A	
Metric 3.7: Host country authorization	YES	YES	N/A	
Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity companies must provide information related to how the credit promotes equity and generates co-benefits to ecosystems and local economies	YES	YES	N/A	
Step 4				
Metric 4.1: Name of assurance provider	YES	YES	N/A	
Metric 4.2: Name of assurance standard	YES	YES	N/A	
Metric 4.3: Level of assurance	YES	YES	N/A	
Metric 4.4: Period covered by assurance	YES	YES	N/A	

VCMI Metric	Initial year disclosure	Annual disclosure	Other timing considerations
Scope 3 Flexibi	lity Claim		
Scope 3 Flexibility Claim Metric 1: Target level emissions in the most recent reporting year	YES	YES	N/A
Scope 3 Flexibility Claim Metric 2: Most recent reporting year scope 3 emissions gap	YES	YES	N/A
Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year, in accordance with target boundary	YES	YES	N/A



Appendix D: Climate disclosure framework alignment



## Appendix D: Climate disclosure Framework alignment

The summary mapping table shown below illustrates the congruence between the VCMI Claims Code requirements and other corresponding frameworks. VCMI intends to build on and align with—not duplicate—existing benchmarks and corporate accountability frameworks. The purpose of the mapping is to highlight instances where companies may have previously disclosed a particular metric, ultimately minimizing the reporting burden. Where required data directly overlaps, companies may submit sustainability reports, annual reports, integrated reports, CDP questionnaires, or other forms of reports accompanied with the applicable assurance report or conclusion, if applicable, as their evidence of public disclosure. Additional guidance on how existing reports can be used to meet the VCMI Claims Code requirements is outlined in Section 2 of this document.

The definitions of 'aligned,' 'partially aligned' and 'not aligned' will indicate the extent to which VCMI aligns with the given framework.

Currently, companies may have reporting established and aligned with some of the frameworks listed in the table below, each of which may or may not include assurance requirements. However, to qualify for a VCMI Claim, companies' adherence to the assurance levels defined by the MRA Framework for each key metric is mandatory.

Aligned: Indicates that both VCMI and the respective framework require the same metric

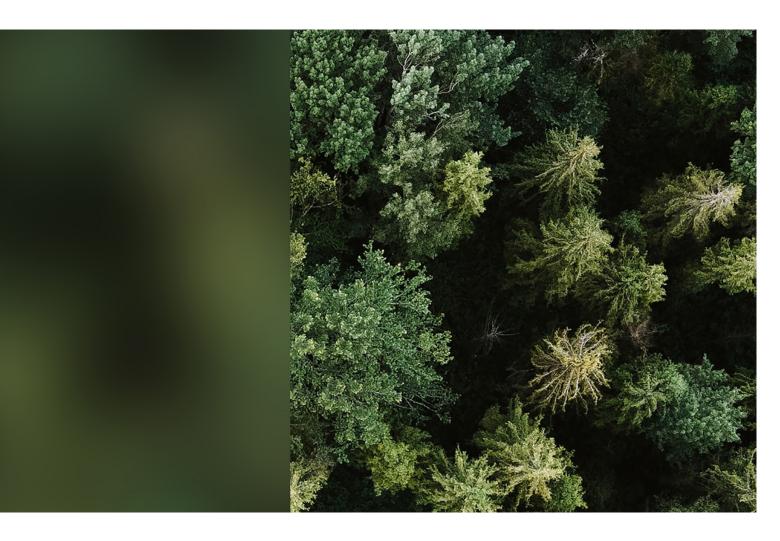
Partially aligned: Indicates that both VCMI and the respective framework require a similar but different metric

Not aligned: Indicates that this metric does not overlap within VCMI and the respective framework

VCMI Metric	CSRD	CDP	IFRS	GRI	TCFD
	Foundational C	Criterion 1			
$ \begin{array}{l} \textbf{Metric 1.1:} \ \text{Gross scope 1 GHG emissions in metric} \\ \text{tonnes of CO}_2 \ \text{equivalent for the base year and most} \\ \text{recent reporting year} \\ \end{array} $	Aligned	Aligned	Aligned	Aligned	Aligned
<b>Metric 1.2:</b> Gross scope 2 GHG emissions in metric tonnes of $\mathrm{CO}_2$ equivalent for the base year and most recent reporting year	Aligned	Aligned	Aligned	Aligned	Aligned
<b>Metric 1.3:</b> Gross scope 3 GHG emissions in metric tonnes of $\mathrm{CO}_2$ equivalent by category for the base year and most recent reporting year	Aligned	Aligned	Aligned	Aligned	Aligned
Metric 1.4: A list of scope 3 categories included and excluded, with justification of exclusion, for the base year and reporting year	Aligned	Aligned	Aligned	Aligned	Aligned
Metric 1.5: An explanation for any base year recalculations	Not aligned	Aligned	Not aligned	Aligned	Not aligned
	Foundational C	Criterion 2			
Metric 1.6: Near-term emission reduction target base year	Aligned	Aligned	Aligned	Partially aligned	Aligned
Metric 1.7: Near-term emission reduction target year	Aligned	Aligned	Aligned	Partially aligned	Aligned
Metric 1.8: Near-term emission reduction target boundary	Aligned	Aligned	Aligned	Partially aligned	Aligned
Metric 1.9: Near-term emission reduction target ambition	Not aligned	Aligned	Partially aligned	Partially aligned	Partially aligned
<b>Metric 1.10:</b> Has near-term target been validated by SBTi?	Partially aligned	Aligned	Aligned	Partially aligned	Partially aligned
				Dorticlly	Partially
Metric 1.11: Date long-term net zero commitment was made	Aligned	Not aligned	Not aligned	Partially aligned	aligned

VCMI Metric	CSRD	CDP	IFRS	GRI	TCFD
	Foundational C	Criterion 3			
Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year across the company's value chain	Partially aligned	Aligned	Aligned	Partially aligned	Partially aligned
Metric 1.14: The percentage of CAPEX and OPEX made during the most recent reporting year dedicated to GHG mitigation across the company's value chain	Partially aligned	Aligned	Aligned	Partially aligned	Partially aligned
Metric 1.15: Definition of CAPEX and OPEX	Not aligned	Not aligned	Not aligned	Not aligned	Partially aligned
Metric 1.16: The percentage of planned annual revenue earmarked for GHG mitigation across the company's value chain	Partially aligned	Partially aligned	Aligned	Partially aligned	Partially aligned
Metric 1.17: The percentage of CAPEX and OPEX planned to be dedicated to the GHG mitigation across the company's value chain	Partially aligned	Partially aligned	Aligned	Partially aligned	Partially aligned
Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.	Partially aligned	Not aligned	Aligned	Not aligned	Partially aligned
Metric 1.19: Companies shall state if they have any of the following metrics:					
Board or senior management level compensation linked to climate performance indicators	Aligned	Aligned	Aligned	Aligned	Partially aligned
Board or senior management level capabilities or expertise on climate related issues	Aligned	Partially aligned	Aligned	Aligned	Not aligned
Frequency of Board-level reviews on progress towards meeting near-term emissions targets	Aligned	Aligned	Aligned	Not aligned	Partially aligned
	Foundational C	Criterion 4			
Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement	Not aligned	Partially aligned	Not aligned	Not aligned	Not aligned
	Step 2				
Metric 2.1: VCMI Claim	N/A	N/A	N/A	N/A	N/A
Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code	N/A	N/A	N/A	N/A	N/A
Metric 2.3: Percentage of total GHG emissions reductions achieved in the most recent reporting year compared to the base year	Aligned	Not aligned	Partially aligned	Partially aligned	Partially aligned
Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers to have made progress towards meeting its near-term emission reduction target	Partially aligned	Partially aligned	Partially aligned	Partially aligned	Partially aligned
	Step 3	3			
Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim	Partially aligned	Aligned	Partially aligned	Not aligned	Not aligned
Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date, and issuing registry for each credit used	Not aligned				
Metric 3.3: Host country	Not aligned				
Metric 3.4: Credit vintage	Not aligned	Aligned	Not aligned	Not aligned	Not aligned
Metric 3.5: Methodology	Not aligned	Aligned	Not aligned	Not aligned	Not aligned
Metric 3.6: Project type	Not aligned	Aligned	Not aligned	Not aligned	Not aligned
Metric 3.7: Host country authorization	Not aligned				
Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity companies must provide information related to how the credit promotes equity and generates co-benefits to ecosystems and local economies	Not aligned				
	Step 4				
Metric 4.1: Name of assurance provider	Aligned	Aligned	Not aligned	Aligned	Not aligned
Metric 4.2: Name of assurance standard	Aligned	Aligned	Not aligned	Aligned	Not aligned
Metric 4.3: Level of assurance	Aligned	Aligned	Not aligned	Aligned	Not aligned
Metric 4.4: Period covered by assurance	Aligned	Aligned	Not aligned	Aligned	Not aligned

VCMI Metric	CSRD	CDP	IFRS	GRI	TCFD
Scope 3 Flexibility Claim					
Scope 3 Flexibility Claim Metric 1: Target level emissions in the most recent reporting year	Not aligned				
Scope 3 Flexibility Claim Metric 2: Most recent reporting year Scope 3 emissions gap	Not aligned				
Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year	Not aligned				



Appendix E:
Frameworks
and standards
in the MRA
Framework



### Appendix E: Frameworks and standards in the MRA Framework

The MRA Framework information requirements leverage several commonly used and accepted frameworks and standards. A list of the commonly referenced standards and frameworks within this MRA Frameworkis provided below:

#### THE GREENHOUSE GAS PROTOCOL

The GHG Protocol is widely accepted as the standard for GHG inventory baselining, reporting, and management. Foundational Criterion (FC) 1 relies on companies adhering to these guidance and standards for GHG inventories: GHG Protocol Corporate Accounting and Reporting Standard, the GHG Protocol Corporate Value Chain (Scope 3) Standard, and applicable guidance such as the GHG Protocol Scope 2 Guidance.

#### SCIENCE BASED TARGETS INITIATIVE (SBTI)

An <u>SBTi</u> validated science-based target (SBT) is the industry guidance and standard provided by the SBTi to set the near-term emission reduction targets required as part of any VCMI Claim, in line with a 1.5-degree Celsius scenario. An alternative methodology to validate science-based targets that is available for multiple industries does not yet exist. Once available and widely accepted in the industry, alternate science-based methodologies will be further evaluated for inclusion into the MRA Framework.

#### CLIMATE AND SUSTAINABILITY REPORTING STANDARDS

The MRA Framework has significant overlap with <u>International Financial Reporting Standards</u> (IFRS), <u>Global Reporting Initiative</u> (GRI), and <u>Taskforce for Climate Related Financial Disclosures</u> (TCFD). A full summary table of alignment and metrics is available in the <u>Appendix D: Climate Disclosure Framework Alignment</u>.

### CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD) AND EU SUSTAINABILITY REPORTING STANDARDS (ESRS)

The <u>CSRD</u> is a Directive requiring sustainability reporting and is applicable to companies with operations and activity in the European Union. The <u>ESRS</u> are the standards that guide compliance with the regulation. The MRA Framework has identified alignment between required metrics for a VCMI Claim and those metrics within the CSRD. Please note that required metrics for a VCMI Claim and the CSRD may be completely aligned, partially aligned, or not aligned at all; additional information is available regarding the alignment of different metrics in subsequent sections.

#### INDEPENDENT THIRD-PARTY ASSURANCE STANDARDS

The MRA Framework requires independent third-party assurance to provide integrity to the data and information submitted to make a VCMI Claim. This includes the following assurance bodies:

- International Standards on Assurance Engagements (ISAE)12,
- American Institute of Certified Public Accountants (AICPA),
- International Organization for Standardization (ISO) for verification of GHG emissions as required within FC1, ISO Standard 14064-3 (Second edition 2019-04): Greenhouse gases
   Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

The ISAE and AICPA are the recognized assurance standards to be used by independent third parties when performing assurance over all the key metrics. Additionally, for FC1 GHG emissions, ISO Standard 14064-3 can be used to verify these metrics in providing limited assurance review. In developing the MRA Framework, alternate methods of assurance were considered and will continue to be evaluated.

#### **DISCLAIMER**

Where the Claims Code of Practice and/or its accompanying documents rely on guidance, standards, codes and other thirdparty documents, these are only non-exhaustive examples of such third-party documents and neither VCMI nor other individuals and organizations who contributed to the Code and/ or its accompanying documents assume responsibility for the accuracy of the information or processes outlined in such thirdparty documents, and any consequences or damages, legal or otherwise, resulting directly or indirectly from any use of, or as a result of relying on these third-party documents or their contents, or otherwise arising in connection therewith. Organizations are recommended to consult the primary sources of all guidance, standards, codes and other third-party documents referred to in the Code and its accompanying documents, make an independent evaluation of their credibility and take independent legal advice on their intended use in all relevant jurisdictions.

<sup>12 &</sup>lt;u>ISSA 5000</u> (exposure draft) General Requirements for Sustainability Assurance Engagements is anticipated to be finalized in September 2024, this standard should be used in replacement of ISAE 3000 (Revised) at that time, as applicable.

Appendix F:
Detailed
assurance
requirements



### Appendix F: Detailed assurance requirements

Assurance shall be performed by an independent, accredited thirdparty to provide verification of data, criteria, and information. Thirdparty assurance is best practice in sustainability reporting, as it provides the verification of reporting quality and integrity of the calculation methods and underlying data.

The assurance standards define the differing engagement types and procedures to be performed by the assurance provider. When referring to assurance requirements within the MRA Framework, the accepted levels of assurance are defined below:

#### **PUBLIC DISCLOSURE**

For key metric areas where required assurance is not yet common nor required by regulatory bodies, the MRA Framework has identified certain key metrics as public disclosure. These key metrics are required to be publicly disclosed through annual reports, the company's website, or other external reporting

#### LIMITED ASSURANCE

Limited assurance is a lower level of assurance attained through a review engagement. A conclusion is expressed based on the practitioner's review of evidence and procedures performed that nothing came to the practitioner's attention that would indicate that management's assertion is materially misstated

#### REASONABLE ASSURANCE

Currently, reasonable assurance is not required over any key metrics for assurance. VCMI will continue to evaluate the assurance landscape and update future assurance requirements. Reasonable assurance is the highest level of assurance that can be attained.

### REQUIREMENTS FOR COMPETENCIES OF ASSURANCE PROVIDERS

Assurance providers are required to follow the assurance body standards outlined in Table 3 below when evaluating the competency of the engagement team and the use of specialists or experts, as necessary. The assurance provider should agree to provide only those services that they are competent to perform. The assurance provider's quality control measures should incorporate the competency of personnel through recruitment and formal training provided and consider the experience, complexity of the engagement, and the team's participation in similar engagements and training. Additionally, the assurance provider should consider the technical expertise required with specialized areas relevant to the underlying subject matter.

#### Assurance Body

The <u>Auditing Standards Board (ASB)</u> is the AICPA's senior committee for auditing, attestation, and quality control applicable to the performance and issuance of audit and attestation reports.

As the national, professional organization for all Certified Public Accountants (CPA's) in the United States, the <u>AICPA's</u> mission is to power the success of global business, CPAs, Chartered Global Management Accountants (CGMA) and specialty credentials by providing the most relevant knowledge, resources, and advocacy, and protecting the evolving public interest

Issuers: AICPA member firms

The following is a link to the AICPA's website that companies may use to identify an assurance provider: <a href="https://us.aicpa.org/">https://us.aicpa.org/</a> forthepublic/findacpa

#### Standards and Requirements

Statements on Standards for Attestation Engagements (SSAEs) clarified attestation standards

- AT-C section 105 Concepts Common to All Attestation
   Engagements; SSAE No. 18, 19, 21
- AT-C section 210 Review Engagements; SSAE No.22

Ethics, conduct and quality requirements

- <u>AICPA Code of Professional Conduct</u> and the attestation standards outline the ethics and conduct requirements.
- The code outlines principles expressing the profession's recognition of its responsibilities to the public, clients, and colleagues. The principles of professional conduct include responsibilities, public interest, integrity, objectivity and independence, due care, scope, and nature of services.
- QM section 10A Firm's System of Quality Control, the firm has an obligation to establish and maintain a system of quality control to provide it with reasonable assurance that the firm and its personnel comply with professional standards and applicable legal and regulatory requirements and practitioners' reports issued by the firm are appropriate in the circumstance.

International Auditing and Assurance Standards Board (IAASB)

Develops auditing and assurance standards and guidance for use by all professional accountants under a shared standardsetting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB.

Issuers: Assurance practitioners

The following is a link to the International Federation of Accountants website that companies may use to identify an assurance provider: https://www.ifac.org/who-we-are/membership

ISAE applied in assurance engagements other than audits or reviews of historical financial information.

- ISAE 3000 (Revised)
- ISAE 3410

Ethics, conduct and quality requirements

- International Ethics Standards Board for Accountants (IESBA) International Code of Ethics for Professional Accountants including International Independence Standards.
- International Standard on Quality Management (ISQM) 1
  The standard encourages firms to design a system of quality management that is tailored to the nature and circumstances of the firm and engagements it performs. ISQM 1 applies to all firms that perform engagements under the IAASB's international standards.
- The ISSA 5000 ED provides a standard that can be used by all assurance practitioners. The Standard requires systems of quality management and independence and ethics. The assurance practitioner must adhere to the requirements above or other professional requirements that are at least as demanding.

International Organization for Standardization (ISO) (applicable to GHG emission assurance ISO 14064-3 Greenhouse gases).

Issuers: Independent third-party ISO verifiers

The following is a link to the ISO's website that companies may use to identify an assurance provider: <a href="https://www.iso.org/certificwww.gation.html">https://www.iso.org/certificwww.gation.html</a>

International Accreditation Forum <a href="https://iaf.nu/en/recognised-abs/">https://iaf.nu/en/recognised-abs/</a>

- <u>ISO 14064-3:</u> ISO Standard 14064-3 (Second edition 2019-04): Greenhouse gases - Part 3: Specification with guidance for the verification and validation of greenhouse gas statements
- <u>ISO 14065:</u> General principles and requirements for bodies validating and verifying environmental information
- <u>ISO 14066</u>: Environmental information competence requirements for teams validating and verifying environmental information

Ethics, conduct and quality requirements

ISO Code of Ethics and Conduct

Appendix G: Forthcoming regulatory assurance requirements



## Appendix G: Forthcoming regulatory assurance requirements

VCMI has included references to the EU Corporate Sustainability Reporting Directive (CSRD) to illustrate where VCMI assurance requirements may be met for those companies subject to the CSRD regulation, as shown below. As defined by the CSRD, limited assurance in the first year of reporting will be required. Reporting obligations may begin in 2025 covering the 2024 reporting period for applicable companies.

The International Organization of Securities Commissions (IOSCO) endorsed the IFRS Sustainability Disclosure Standards S1 and S2. Subsequently, IOSCO called on their members and jurisdictions to consider ways in which they might adopt, apply, or otherwise be informed by the International Sustainability Standards Board (ISSB) standards. Once adopted by jurisdictions, specific reporting timelines will be established. ISSB and the European Commission are developing an interoperability guide between the standards, but this is not yet final. This will evolve as IOSCO jurisdictions adopt the ISSB standards and reporting compliance dates identified. When a company is utilizing the ISSB standards for reporting it should leverage the interoperability document.

VCMI will continuously assess the assurance requirements of the evolving regulatory disclosure frameworks and update the MRA Framework accordingly.

Topic	Metric	Existing assurance requirements
Foundational Criterion 1:  Maintain and publicly disclose an annual greenhouse gas emissions inventory	$\label{eq:Metric 1.1:} Metric 1.1: Gross scope 1 GHG emissions in metric tonnes of CO_{\tiny 2} equivalent for the base year and most recent reporting year$	CSRD Disclosure Requirement E1-6
	<b>Metric 1.2:</b> Gross scope 2 GHG emissions in metric tonnes of ${\rm CO_2}$ equivalent for the base year and most recent reporting year	CSRD Disclosure Requirement E1-6
	<b>Metric 1.3</b> : Gross scope 3 GHG emissions in metric tonnes of ${\rm CO_2}$ equivalent by category for the base year and most recent reporting year	CSRD Disclosure Requirement E1-6
	Metric 1.4: A list of scope 3 categories included and excluded, with justification of exclusion, for the base year and reporting year	CSRD Disclosure Requirement E1-6
	Metric 1.5: An explanation for any base year recalculations	N/A
Foundational Criterion 2: Set and publicly disclose science-aligned near-term emissions reduction targets, and publicly commit to reaching net zero emissions no later than 2050	Metric 1.6: Near-term emission reduction target base year	CSRD Disclosure Requirement E1-4
	Metric 1.7: Near-term emission reduction target year	CSRD Disclosure Requirement E1-4
	Metric 1.8: Near-term emission reduction target boundary	CSRD Disclosure Requirement E1-4
	Metric 1.9: Near-term emission reduction target ambition	N/A
	Metric 1.10: Has near-term target been validated by SBTi or obtained limited assurance in alignment with NZBA?	CSRD Disclosure Requirement E1-4 <sup>9</sup>
	Metric 1.11: Date long-term net zero commitment was made	CSRD Disclosure Requirement E1-4
	Metric 1.12: Long-term net zero definition	N/A

Foundational Criterion 3: Demonstrate that the company is making progress in investments averaged types.	Metric 1.13: The percentage of annual revenue dedicated to GHG mitigation during the most recent reporting year	CSRD Disclosure Requirement E1-1 <sup>13</sup>
investments, expenditures on financial allocation, governance and strategy towards meeting	Metric 1.14: The percentage of CAPEX and OPEX made during the most recent reporting year dedicated to GHG mitigation across the company's value chain	CSRD Disclosure Requirement E1-19
its near-term emission reduction target	Metric 1.15: Definition of CAPEX and OPEX	N/A
	Metric 1.16: The percentage of planned annual revenue dedicated to GHG mitigation	CSRD Disclosure Requirement E1-19
	Metric 1.17: The percentage of CAPEX and OPEX planned to be dedicated to GHG mitigation across the company's value chain	CSRD Disclosure Requirement E1-19
	Metric 1.18: A statement to explain why the aforementioned financial metrics cannot be disclosed and a qualitative description and analysis of investments made, and steps taken related to GHG mitigation.	CSRD Disclosure Requirement E1-19
	Metric 1.19: Companies shall state if they have any of the following of these metrics:	CSRD Disclosure Requirement
	Board or senior management level compensation linked to climate performance indicators; or	GOV-1, GOV-2, GOV-3
	Board or senior management level capabilities or expertise on climate related issues; or	
	Frequency of Board-level reviews on progress towards meeting near-term emission reduction targets.	
Foundational Criterion 4:  Demonstrate that the company's public policy advocacy supports the goals of the Paris Agreement and does not represent a barrier to ambitious climate regulation	Metric 1.20: A public statement describing how advocacy activities are consistent with the goals of the Paris Agreement	N/A
Step 2: Select a VCMI Claim to	Metric 2.1: VCMI Claim	N/A
make	Metric 2.2: Statement asserting compliance with the Foundational Criteria and all additional requirements in the VCMI Claims Code	N/A
	Metric 2.3: Percentage of total GHG emissions reductions achieved in the most recent reporting year (in absolute or intensity terms) compared to the base year	CSRD Disclosure Requirement E1-6
	Metric 2.4: Publicly provide an explanation that outlines whether and why the company considers to have made progress towards meeting its near-term emission reduction target	CSRD Disclosure Requirement E1-39
Step 3: Meet the required carbon credit use and quality thresholds	Metric 3.1: Number of credits purchased and retired that the company applied towards the VCMI Claim	CSRD Disclosure Requirement E1-79
	Metric 3.2: Certification standard name, project name, project ID, retirement serial number, retirement date, and issuing registry for each credit used	N/A
	Metric 3.3: Host country	N/A
	Metric 3.4: Credit vintage	N/A
	Metric 3.5: Methodology	N/A
	Metric 3.6: Project type	N/A
	Metric 3.7: Host country authorization	N/A
	Metric 3.8: If associated with additional third-party certification regarding social or environmental integrity companies must provide information related to how the credit promotes equity and generates co-benefits to ecosystems and local economies	N/A

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Scope 3 Flexibility Claim	Scope 3 Flexibility Claim Metric 1: Target level emissions in the most recent reporting year	N/A
	Scope 3 Flexibility Claim Metric 2: Most recent reporting year Scope 3 emissions gap	N/A
	Scope 3 Flexibility Claim Metric 3: 50% of scope 3 emissions of the most recent reporting year	N/A



# OVERLAP IN ASSURANCE REQUIREMENTS BETWEEN FOUNDATIONAL CRITERION 1: MAINTAIN AND PUBLICLY DISCLOSE AN ANNUAL GREENHOUSE GAS EMISSIONS INVENTORY AND THE CSRD

Companies that are subject to the CSRD will be required to report gross scopes 1, 2, and 3 GHG emissions as well as include a list of scope 3 included and excluded categories as outlined in the most up to date <u>ESRS E1 Climate Change Standards</u>, specifically found within *Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions*.

OVERLAP IN ASSURANCE REQUIREMENTS BETWEEN FOUNDATIONAL CRITERION 2: SET AND PUBLICLY DISCLOSE SCIENCE-ALIGNED NEAR-TERM EMISSION REDUCTION TARGETS, AND PUBLICLY COMMIT TO REACHING NET ZERO EMISSIONS NO LATER THAN 2050 AND THE CSRD

Companies that are subject to the CSRD will be required to report the near-term emission reduction target base year, target year, and how the target boundary is consistent with GHG inventory boundaries as outlined in the most up to date ESRS E1 Climate Change Standards, specifically found within Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation. Additionally, companies must state whether the GHG emission reduction targets are science based and compatible with limiting global warming to 1.5°C under Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation.

OVERLAP IN ASSURANCE REQUIREMENTS BETWEEN FOUNDATIONAL CRITERION 3: DEMONSTRATE THAT THE COMPANY IS MAKING PROGRESS ON FINANCIAL ALLOCATION, GOVERNANCE AND STRATEGY TOWARDS MEETING ITS NEAR-TERM EMISSION REDUCTION TARGET AND THE CSRD

Companies that are subject to the CSRD will be required to report their progress reductions achieved in the most recent reporting year compared to the base year as outlined in the most up to date <a href="ESRS E1 Climate">ESRS E1 Climate</a>
<a href="Change Standards">Change Standards</a>, specifically found under Disclosure Requirement</a>
<a href="E1-6">E1-6</a> — Gross Scopes 1, 2, 3 and Total GHG emissions</a>. For financial metrics regarding annual revenue or CAPEX and OPEX dedicated to, or planned to be dedicated to, GHG mitigation during the most recent reporting year, companies are required to provide an explanation and quantification of the undertaking's investments and funding supporting the implementation of its transition plan as outlined in the most up to date <a href="ESRS E1 Climate ChangeStandards">ESRS E1 Climate ChangeStandards</a>, specifically found within Disclosure Requirement E1-1 — Transition

plan for climate change mitigation. In addition, Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies requires undertakers to relate significant monetary amounts of CAPEX and OPEX required to implement the actions taken or planned actions taken as it relates to climate change mitigation and GHG emissions reductions. Metrics regarding the Board or senior management's level capabilities or expertise on climate related issues can be found outlined in the most up to date ESRS E2 General Disclosures, specifically under Disclosure Requirement Disclosure Requirement GOV-1 - The role of the administrative, management and supervisory bodies. Metrics regarding the frequency of Board-level reviews on progress towards meeting near-term emission reduction targets can be found as outlined in Disclosure Requirement GOV-2 - Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies. Metrics regarding the Board or senior management level compensation linked to climate performance indicators can be found outlined in Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes.

### OVERLAP IN ASSURANCE REQUIREMENTS BETWEEN STEP 2: SELECT A VCMI CLAIM TO MAKE AND THE CSRD

Companies that are subject to the CSRD will be required to report the list of key mitigation actions alongside the measurable targets as outlined in the most up to date, specifically found within *Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies*. The answers provided to this question will assist companies in responding to provide VCMI requirement to providing an explanation that outlines whether and why the company considers itself to have made progress towards meeting its near-term emission reduction target.

# OVERLAP IN ASSURANCE REQUIREMENTS BETWEEN STEP 3: MEET THE REQUIRED CARBON CREDIT USE AND QUALITY THRESHOLDS AND THE CSRD

Companies that are subject to the CSRD will be required to report the number of credits purchased and retired as outlined in the most up to date <u>ESRS E1 Climate Change Standards</u>, specifically found under *Disclosure Requirement E1-7 – GHG removals and GHG mitigation projects financed through carbon credits*. It should be noted that unlike the CSRD, the VCMI metric, as noted above, requires CCP or CORSIA approved credits or that companies meet the transition guidance of aligning due diligence processes with CCP. The CSRD requires explanation of the credibility and integrity of the carbon credits used, including reference to recognized quality standards.

Appendix H:
Assurance
provider
guidance
checklist



### Appendix H: Assurance provider guidance checklist

VCMI allows companies to provide evidence of previously obtained third-party assurance for the purpose of making a VCMI Claim, as long as the assurance is conducted in line with one of the accepted assurance standards as detailed in Appendix F above.

Assurance providers may utilize this checklist to assist with identifying the requirements for assurance, and applicable assurance bodies and standards.

Assurance provider guidance checklist				
Assurance provider shall be an approved assurance body as outlined within the MRA Framework <u>Table 3</u> .				
Assurance provider shall use the assurance standards as outlined within the MRA Framework <u>Table 3</u> .				
Assurance provider shall follow the ethics, conduct, quality, competency, and independence requirements as outlined within the applicable assurance body standards and included in the MRA Framework <u>Table 3</u> .				
Assurance provider shall refer to the Foundational Criteria and the applicable level of assurance required for each key metric for assurance identified within the MRA Framework, as summarized in Table 2.				
Applicable standards for key metrics for assurance are referenced within the MRA Framework here. The criteria should align to the standards and frameworks identified for the metric within the MRA Framework in order to evaluate the metric and underlying subject matter, as applicable				
The following key metrics for assurance require independent limited assurance				
Guidance provided below is to assist assurance providers				
Companies may currently be obtaining limited assurance over the key metrics for assurance, companies should review the MRA Framework referenced standards and reporting guidance for alignment with current assurance obtained.				
Foundational Criterion 1: Maintain and publicly disclose an annual greenhouse gas emissions invento Limited assurance is required for scope 1 and 2, and any base year recalculations for scopes 1 and 2, a outlined for metrics 1.1, 1.2 and 1.5 in Section 2 of this framework. Assurance providers shall reference applicable standards for GHG reporting as outlined within these relevant sections of the MRA Framework.	S			
Metric 1.1: Gross scope 1 GHG emissions in metric tonnes of CO2 equivalent for the base year and most recent reporting year				
Metric 1.2: Gross scope 2 GHG emissions in metric tonnes of CO2 equivalent for the base year and most recent reporting year				
Metric 1.5: An explanation for any base year recalculations (as applicable)				

The Voluntary Carbon Markets
Integrity Initiative is an internationa
initiative to drive credible, net zeroaligned participation in voluntary
carbon markets.