Northern Bank Limited T/A Danske Bank in the UK

Mortgage Service (Provision of a new-to-bank mortgage)

Qualifying Explanatory Statement in support of the

Achievement of and ongoing commitment to carbon neutrality

Application Period: January 2022-December 2022

Date: 11th January 2024

1. Executive summary

This document is the Qualifying Explanatory Statement (QES) which provides collected evidence in support of the declaration that Northern Bank Ltd t/as Danske Bank in the UK:

- 1. has achieved carbon neutrality for its Mortgage Service (provision, maintenance and closure of mortgages to retail customers) marketed in UK for the period commencing 1st January 2022 to 31st December 2022 (see Section 3); and
- 2. is committed to maintaining carbon neutrality for its cradle-to-grave Mortgage Service (see section 4).

The carbon neutrality declaration has been made and the collected supporting evidence has been provided in accordance with the requirements prescribed by PAS 2060:2014 – Specification for the demonstration of carbon neutrality.

Chris Martin

Head of Sustainability

11th January 2024

2. General information

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Entity making PAS 2060 declaration:	Northern Bank Ltd t/as Danske Bank in the UK. Donegall Square West, Belfast, BT1 6JS.
Subject of PAS 2060 declaration:	Cradle-to-grave Mortgage Service (Provision of a new-to-bank mortgage)
Description of Subject:	Danske Bank is the largest retail Bank and a leading mortgage provider in Northern Ireland. We provide a regulated mortgage service to customers seeking a mortgage, via direct and indirect (Broker) channels, meeting all legal and regulatory requirements associated. Dependant on the buyer type, provision of this service includes either advising customers on product selection following a regulated meeting with a Danske Bank Advisor or Broker or facilitating a non-advised service for customers wishing to product transfer at fixed rate maturity. We also issue and process all relevant documents and agreements, provide ongoing paperwork and updates (e.g., statements) and 'complete end of life' processes and admin, when the mortgage is paid off / switched out / otherwise closed.

Rationale for selection of the subject:	Danske Bank recognises our important role in the transition of society to a low carbon future. We assess the climate risks and opportunities associated with our business activities, and on the basis of the international standards and principles that we support, we increasingly integrate climate considerations into our product offerings. The mortgage service was selected for footprinting review as it is our most significant product in personal banking in terms of marketing and customer interest. Furthermore, we are mindful of our responsibility as the number 1 bank in Northern Ireland to educate customers on the importance of making 'greener' choices for their homes, it is believed to be a fitting product to start with.
Boundary:	Cradle to Grave
Type of conformity assessment:	Independent third-party certification (see Annex 4)
Baseline date for PAS 2060 programme:	January 2021 – December 2021
Individuals responsible for evaluation and provision of data necessary for declaration:	Adrian Stinson, Home Loans Product Manager (Secondment), Danske Bank Josh Turbitt, Home Loans Product Analyst, Danske Bank

3. Declaration of achievement of carbon neutrality

PAS 2060 Requirement	Information relating to the carbon neutral declaration
Declaration of achievement:	Carbon neutrality of provision of mortgage service in Northern Ireland and Great Britain achieved by Northern Bank Ltd t/as Danske in accordance with PAS 2060 at January 2024 for the period commencing January 2022 – December 2022, certified by the Carbon Trust.
Recorded carbon footprint of the subject during the period stated above	128.1 tCO2e (location-based approach, Northern Ireland & Great Britain) 79.2 tCO2e (market-based approach, Northern Ireland & Great Britain) See Annex 1 for further details.
Carbon footprint reduction target for period	The target for reduction in 2022 was to reduce 137,008 sheets of paper from the mortgage service journey.

Carbon footprint reduction achieved for period	This was obtained through digitising the Direct Conditional Offer pack and Advised Product Transfer packs. This reduces the amount of paper produced from a baseline of 171,260 to 34,252 (80% reduction of quantity of paper).
Carbon offsets purchased	131 (tCO2e) carried over from previous recertification. see previous year's QES for further details. https://danskebank.co.uk/personal/products/mortgages/carbon-neutral-mortgages#accordion-0-item-0
	Annex 2 for further details.

3.1. Carbon footprint methodology

PAS 2060 Requirement	Information relating to the carbon neutral declaration
Description of the standard and methodology used to determine GHG emissions and reductions	The methodology for calculating the carbon footprint was as follows: The mortgage service footprint was calculated based on the physical and digital paperwork emissions occurring through the mortgage application, maintenance/use, and end-of-life stages. For each of these lifecycle stages, the cradle-to-grave emissions of physical and digital paperwork were calculated. For physical paperwork the cradle-to-grave lifecycle stages are paper usage (cradle to gate), printing, envelopes, posting of paperwork, and the end-of-life of paper and envelopes. For digital paperwork the cradle-to-grave lifecycle stages are hosting, transmission, online storage and the reading of paperwork on a device. Emissions for physical and digital paperwork were calculated by using the weight (in kg) of physical paper or the file size (in kb) of digital documents and multiplying this data by the relevant life cycle stage emission factor. Emission factors were used from various sources including paper manufacturers' online information, Ecoinvent 3.9.1, and other secondary sources. Emissions from electricity consumption at physical sites were calculated using measured data, multiplied by the UK grid emission factors were sourced from BEIS). For the market-based approach, supplier-specific emission factors were used for Danske Bank's branches, Head Office in Donegall Square West (DSW) and contact centre (Killeaton House). Emission factors were sourced from Carbon Trust's Footprint Expert Analysis Tool, Ecoinvent 3.9.1, secondary papers and from BEIS. Business travel emissions were calculated using primary data on the distances travelled by taxi, aviation and car for business development related to the mortgage provision, multiplied by BEIS emission factors.

	This methodology was developed to be in accordance with the requirements of GHG Protocol Product Standard, ISO 14067 and PAS 2050, etc.
	Please refer to section 2.4 of the Product Emissions Report (PER) for the full methodology.
	The provisions of the methodology for calculating the carbon footprint was applied as detailed and the principles set out in PAS 2060 were met.
Justification for the selection of the methodologies chosen	Please see table below.

Process Step	Key Assumption
Physical site emissions - Branches	Assumptions have been built around the percentage activity in branches (based on new-to-bank sanctions data in the reporting period, translated as a percentage to an FTE equivalent), then applied to the emissions for the building. The FTE equivalent used in the mortgage journey for a given branch is the product of the total FTE of the branch multiplied by the percentage volume of sanctions (i.e. applications approved) of that branch as a proportion of total sanctions across all branches
Emissions data- shared occupancy in offices/ contact centre	Assumptions have been built around the percentage occupancy on shared floors / in shared buildings to apportion emissions in the mortgage journey, on the basis that 1FTE = 1 desk.
Ongoing paperwork - digital vs digital delivery	Statement delivery can be either physical or digital. Digital delivery is via Danske Bank's eBanking solution into an eBooks (digital file). This solution is issued at customer level, meaning that, if a customer has eBanking, it covers all their accounts. This service footprint is at account level (mortgages only), therefore the number of accounts rather than customers has been used, to give accurate proportions.
Digital paperwork emissions	Emissions from digital paperwork are inherently included in the physical site emissions
Maintenance and use – lifetime of mortgages	It is assumed that the average lifetime of a mortgage is 7 years
Application / Maintenance and use / End of Life – Digital paperwork	The current read time for all digital documents is assumed to be 20 minutes. This is likely to be slightly overstated; if customers read all the declarations and regulatory information, 20 mins is estimated to be accurate. Where they do not, ~5 mins would be more accurate. The overstated figure has been assumed.
Maintenance and use – Customer involvement (online portal & Danske mortgage portal)	The average number of logins per customer to Danske Bank's online portal was estimated based the assumption that the number of days a customer takes to complete a new product choice (at rollover) corresponds to a given number of logins on the online portal.
Welcome Box delivery distance	Welcome Box delivery distance was calculated by taking the average mileage for the top ten postal codes in terms of volumes of boxes delivered and multiplying this figure by the total quantity of boxes issued in the reporting period.

Waste generation - brochureware and centrally (externally) printed items	Waste generation for centrally printed documents and brochureware is assumed to be 0.
Ongoing paperwork - number of pages in statements	The number of pages in a statement varies depending on the number of entries, however on a fixed rate mortgage, this is generally one page (one entry per month plus one permitted overpayment per year, where the feature is available). It is noted that 40 entries on a statement fills one page; it is very unlikely that a statement would exceed this
Contact Centre (Customer Direct) FTE	There are 132.1 FTE in the contact centre. It is estimated that 5% of these staff are involved in the mortgage journey. A small allowance has been made for mortgage queries coming via the general / service line rather than to the dedicated advisory team
Biogenic emissions and removals calculation	Biogenic emissions and removals have been calculated using the Carbon Trust's Biogenics Calculator Tool. The calculation of biogenic emissions and removals is based on the end-of-life fate of paper. It is assumed that the recycling rate for cardboard and paper is the same as the recycling rate for household waste in Northern Ireland and that the remaining portion of waste goes to landfill. The recycling rate for household waste in Northern Ireland is obtained from the UK government
End of year and mid year mail	These emissions are inherently included in physical site emissions.
Business travel - distance travelled via London Underground	The distance travelled via London Underground was estimated. The average distance between two consecutive underground tube stations is equal to ~1.31km as per data from Transport for London. This figure was multiplied by the total number of tube stations between the starting and ending station of a journey. Where only data on a specific address was available rather than a London Underground station, the closest Underground station to the address was assumed to be the starting station of the journey.

3.2. Carbon footprint summary

Carbon Footprint (for latest footprinting year)	Information relating to the carbon neutral declaration
Total Carbon Footprint	The total emissions for all products sold in the boundary is as follows: 128.1 tCO ₂ e (location-based approach, Northern Ireland & Great Britain) 79.2 tCO ₂ e (market-based approach, Northern Ireland & Great Britain) See Annex 1 for further details.
Carbon Footprint per functional unit	The total emissions per functional unit is as follows: 36.3 (kgCO2e/provision of mortgage service) (location-based approach, Northern Ireland) 22.4 (kgCO2e/provision of mortgage service) (market-based approach, Northern Ireland) 29.9 (kgCO2e/provision of mortgage service) (location-based approach, Great Britain) 16.1 (kgCO2e/provision of mortgage service) (market-based approach, Great Britain) Footprints per functional unit differ between Northern Ireland and Great Britian. These differences are due to Welcome Boxes not being sent to Great Britain and are only issued in Northern Ireland. See Annex 1 for further details.

3.3. Carbon reduction

PAS 2060 requirement	Information relating to the carbon neutral declaration
Reductions achieved	13.2% reduction from 25.8 (kgCO2e/provision of mortgage service) in 2021 to 22.4 (kgCO2e/provision of mortgage service) (market-based approach, Northern Ireland) in 2022
	5.9% reduction from 17.1 (kgCO2e/provision of mortgage service) in 2021 to 16.1 (kgCO2e/provision of mortgage service) (market-based approach, Great Britain) in 2022
Baseline period	1 st January 2021 – 31 st December 2021
Confirmation that there has been no change to the definition of the subject	There has been no change to the definition of the subject.
Description of the means	Reductions have obtained through reducing number of physical sheets
by which reductions have	of paper in the mortgage journey as per the carbon management plan.
been achieved and any	Additionally, 13 branches in 2022 transitioned from fuel use to 100%

applicable assumptions	renewable electricity for all energy requirements therefore reducing
or justifications	oil/gas consumption across the branch network.

3.4. Carbon offsets

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Offset methodology	Gold Standard
Offset Confirmation	The offsets generated represent genuine, additional GHG emission reductions elsewhere. Projects involved in delivering offsets meet the criteria of additionality, permanence, leakage and double counting. Carbon offsets are verified by an independent third-party verifier. The credits from the selected carbon offset projects are: only issued after the emission reduction has taken place. supported by publicly available project documentation on a registry which provides information about the offset project, quantification methodology and validation and verification procedures.
Offsets	• stored and retired in an independent and credible registry. The market-based emissions for Northern Ireland and Great Britain have been offset. For 2021 emissions were originally estimated at 256 tCO2e. The following year emissions for 2021 were footprinted with real data to provide total market-based emissions of 125 tCO2e. 2022 was footprinted with real data to provide a total market-based emissions of 80 tCO2e.
	256 tCO2e of carbon offsets were purchased in 2021. 131 tCO2e were carried over from 2021 to 2022. Therefore 51 tCO2e of offsets will be carried over to recertification of neutrality in 2023. Full details of the carbon offsets included in making this declaration are provided in Annex 3.

4. Declaration of ongoing commitment to carbon neutrality

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration			
Declaration of on-going commitment:	Northern Bank Ltd T/A Danske Bank in the UK commits to maintain carbon neutrality for Cradle-to-Grave Mortgage Service (provision, maintenance and closure of mortgages to retail customers)			

in accordance to PAS 2060 for the period 1 January 2023- 31 December 2023 will be achieved by August 2024.

4.1. Carbon management plan

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
	Regarding the carbon management plan, we used the approximate annual volumes of mortgage business averaged across 2020 and 2021 to establish a baseline number of sheets of paper produced in a standard year.
Targets for GHG reduction for the defined subject	In digitising the below detailed documents it is assumed that 80% of customers will opt to receive these digitally.
appropriate to the timescale for achieving	Reduce 137,008 sheets of paper from the mortgage service journey in 2022. This will reduce the overall footprint by 6%.
carbon neutrality	Reduce 101,749 sheets of paper from the mortgage service journey in 2023. This will reduce the overall footprint by a further 5%.
	Reduce 60,998 sheets of paper from the mortgage service journey in 2024. This will reduce the overall footprint by a further 1%.
	In 2022 we digitised the Direct Conditional Offer pack and Advised Product Transfer packs. This reduces the amount of paper produced from a baseline of 171,260 to 34,252 (80% reduction of quantity of paper).
Planned means of achieving avoided GHG	in 2023 we have digitised the Indirect and Direct Binding Offer (Broker) & Solicitor pack (Broker). This further reduced the amount of paper produced from a baseline of 127,186 to 25,437 (80% reduction of quantity of paper).
emissions	In 2024 we will digitise Advice Packs, Product Switch Packs and Product Switch General Offer Conditions. This further reduced the amount of paper produced from a baseline amount of paper from 142,920 to 28,584 (80% reduction of quantity of paper).
	Additionally, we plan to continue to maintain a renewable energy tariff for physical sites throughout 2023 and 2024.
Planned means of achieving and maintaining	Generally, we are continuing to undertake a step-change towards more digital means of operating having undertaken a project in July 2021 in the mortgage service to reduce the paperwork issued to customers in the application stage. This project entailed digitising our 'Offer Packs' via the direct channel, rather than issuing paper packs.
GHG emissions reduction	This resulted in the reduction of 1,911 sheets of paper in Q4 2021. Ongoing enhancements to what we offer through digital signing are detailed in the previous section.
The offset strategy to be adopted for residual emissions	To use the remaining carried over offsets and purchase the remainder

Annex of Qualifying Explanatory Statement

Annex 1: Greenhouse gas emissions summary

A1.1 Carbon footprint details - Net Total Emissions

Product	Stock Keeping Unit	Geographic Area	Total Net tCO₂e not rounded		
Provision of new-to- bank mortgage service	New-to-Bank Mortgage Service (location- based)	Northern Ireland & Great Britain	128.1		
Provision of new-to- bank mortgage service	ew-to- lage New-to-Bank Mortgage Service (market- hased) Northern Ireland & Great Britain		79.2		

A1.2 Carbon footprint details – Net Total Emissions per provision of a new to bank mortgage (Reporting period - CY 2022, Valid 24/07/23-23/07/24)

Product	Stock Keeping Unit	Geographic Area	kgCO ₂ per Functional Unit not rounded	kgCO₂ per Functional Unit rounded	Functional Unit
Provision of new-to- bank mortgage service	New-to-Bank Mortgage Service (location-based)	Northern Ireland	36.3	36	per kgCO2e per provision of a new-to-bank mortgage*
Provision of new-to- bank mortgage service	New-to-Bank Mortgage Service (market-based)	Northern Ireland	22.4		per kgCO2e per provision of a new-to-bank mortgage*
Provision of new-to- bank mortgage service	New-to-Bank Mortgage Service (location-based)	Great Britain	29.9		per kgCO2e per provision of a new-to-bank mortgage*
Provision of new-to- bank mortgage service	New-to-Bank Mortgage Service (market-based)	Great Britain	16.1		per kgCO2e per provision of a new-to-bank mortgage*

A1.3 Methodology overview

Requirement	Information Relating to the Carbon Neutral Declaration
Boundary of the product	 The mortgage service footprint was calculated based on the physical and digital paperwork emissions occurring through the mortgage application, maintenance/use, and end-of-life stages. This includes emissions for all physical and digital paperwork, electricity consumption and business travel. Methodologies include the weight and size of physical paperwork, the hosting and storage of digital paperwork, UK grid emission factors for electricity consumption and distances travelled for business development activities. These methodologies used both primary and secondary data sources.
Boundary of carbon footprint (the greenhouse gas emissions system considered)	 Full end to end life cycle stages were considered alongside Carbon Trust's Footprint Expert Analysis Tool, Ecoinvent 3.9, secondary papers and from BEIS.
Functional unit	per kgCO2e per provision of a new-to-bank mortgage*

A1.4 Lifecycle Overview (market-based, Northern Ireland)

Life cycle stage	Description	kgCO2e per functional unit per life cycle stage	Excluded emissions & Justification	Primary data sources	Secondary data sources	Data quality and uncertainties
Application stage (physical and digital paperwork, (welcome box for NI)	Including: Methods of processing Physical and digital paper work For digital paperwork, energy required for hosting, transmission, online storage. Paper waste generation	9.8	•Condition of Sanction (COS)	Data management system Invoices for welcome box	n/a	Medium
Ongoing maintenance stage/ use phase (ongoing physical paperwork, ongoing digital paperwork, customer involvement)	Including: • Methods of processing • Physical and digital paper work • For digital paperwork, energy required for hosting, transmission, online storage Paper waste generation	2.8	•Ongoing physical paperwork from branches •Communicatio n related to covid schemes •Communicatio n related to customers in default or recovery	• Data management system	n/a	Medium

Physical site emissions	Including: • Physical site energy consumption - Electricity, Natural Gas, Gas Oil and Refrigerants	7.3		Invoices from supplier from gas, electricity, gas oil and refrigerants	n/a	Medium
Business Travel (air, car etc.)	Including: - the emissions due to transport in the UK (where available)	2.3	•Broker meetings	• Flight receipts	n/a	Good
End of life mortgage (physical paperwork and digital paperwork)	Including: Methods of processing Physical and digital paper work For digital paperwork, energy required for hosting, transmission, online storage. Paper waste generation	0.3		n/a	Estimations made	Medium

A1.5 Geographical Areas of Emissions Overview:

Geographical Area	Relevant Emissions							
	Application Stage	Ongoing maintenance (use-phase)	Physical Site emissions	Business Travel	End of life			
Northern Ireland	9.9 kgCO2e	3 kgCO2e	7.3 kgCO2e	2.3 kgCO2e	0.4 kgCO2e			
Great Britain	3.5kgCO2e	2.9 kgCO2e	7.3 kgCO2e	2.3 kgCO2e	0.4 kgCO2e			

Annex 2: Offsets

The below information relates to the compensation of residual emissions (i.e. offsetting):

The volume of emissions reduced or sequestered via carbon offsetting corresponds to the residual emissions of the products in question. As per the requirements of PAS2060, it has been confirmed the offsets have been retired on a public registry to avoid double accounting. The internal process for ensuring there is no double accounting of offsets is as follows:

The purchase, retirement & allocation of all offsets are recorded internally on Danske Bank systems. To ensure that offsets are counted and recorded correctly, the purchase, retirement and allocation of offsets are continually tracked and compared to previous records to prevent any counting error when rolling over offsets.

Project name	Country	Project type	Standard	Type of credits	Total credits	Generation period	Retirement date	Reference No. & link to registry	Offset volume (tCO ₂ e)	Offset Price
GS Renewables	India	Renewables	Gold Standard	Verified Emissions Reductions (VERs)	256	2015+	02/08/2021	https://registry.goldstandard.org/batch- retirements/details/73214	256	Below £10/tCO2e
							Total tonnes	(tCO ₂ e) offset	256	

15/06/2021





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256 Verified Emission Reductions (VERs)

hv

The Carbon Trust

on 02/08/2021

Retired on behalf of Northern Bank Ltd as part of their PAS 2060 certification.

Project: Gyapa Cook Stoves Project in Ghana

These credits have been retired, saving 256 tonnes of CO2 emissions from being released into the atmosphere.

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Annex 4: Independent third-party assurance



Carbon Neutral Label

Northern Bank Limited T/A Danske Bank

has achieved carbon neutrality and is committed to on-going carbon neutrality of the total carbon footprint of its

Provision of a new-to-bank mortgage service*

"includes provision, maintenance and closure of a new-to-bank mortgage (fixed rate and tracker), including a welcome box for Northern Ireland (welcome box not included for Great Britain). Does not include financed emissions.

Carbon Trust Assurance has certified that this project has met all of the requirements for using the Carbon Trust Carbon Neutral Label.



A full description of the scope of certification and a detailed list of certified results can be found in the associated Certification Letter CERT-13599.

Valid From: 24th July 2023 Valid Until: 23th July 2024

for and on behalf of Carbon Trust Assurance Ltd,

Martin Hockaday, Head of Assurance

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Annex 5: Additional supporting information for interested parties

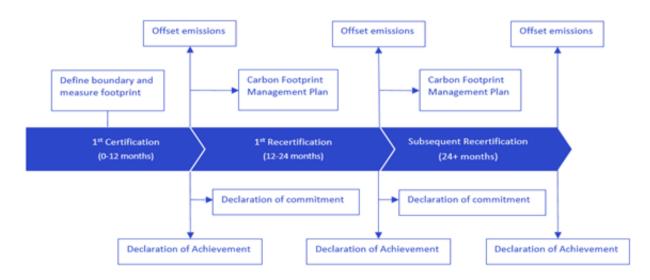


Figure 1. PAS 2060 certification process

Source: Carbon Trust. Adapted from "BSI - PAS 2060:2014: *Specification for the demonstration of carbon neutrality: Figure 1 – Illustration of the cyclical process for demonstrating carbon neutrality, taking into account permitted baseline period exceptions".* [Simplified version]

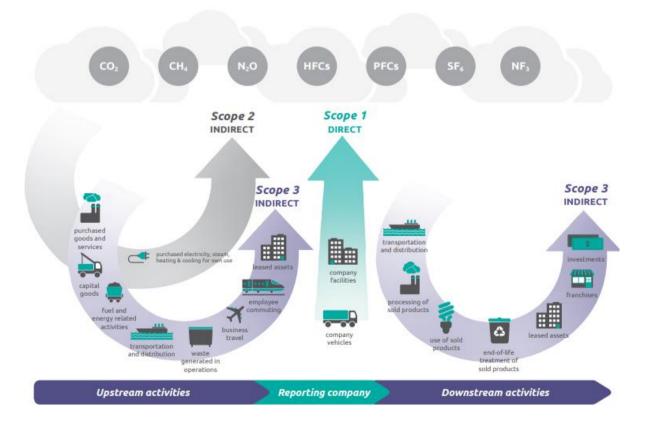


Figure 2. Organisational carbon footprinting

Source: Greenhouse Gas Protocol: http://ghaprotocol.org/

For previous years qualifying explanatory statement please follow link below.

 $\frac{https://danskebank.co.uk/-/media/danske-bank/uk/personal/files/danske-bank-qes-mortgage-service-neutrality.pdf?rev=2444dfe4e1904ceeb3c566f6fe70b53c&hash=A646B1D83ABE547248AE0BF3BEC51\\ \underline{6AC}$