

# Independent Limited Assurance Report

## to the Directors of CLS Holdings plc

CLS Holdings plc (“CLS”) commissioned DNV Business Assurance Services UK Limited (“DNV”, “us” or “we”) to conduct a limited assurance engagement over Selected Information presented in the Annual Report and Accounts 2024 (the “Report”) for the reporting year ended 31 December 2024.



**Our Conclusion:** On the basis of the work undertaken, nothing came to our attention to suggest that the Selected Information is not fairly stated and has not been prepared, in all material respects, in accordance with the Criteria.

This conclusion relates only to the Selected Information, and is to be read in the context of this Independent Limited Assurance Report, in particular the inherent limitations explained overleaf.

Our observations and areas for improvement will be raised in a separate report to CLS’s management. These observations do not affect our conclusion set out above.

### Selected Information

The scope and boundary of our work is restricted to the sustainability metrics included within the Report for the 2024 reporting year (the “Selected Information”), listed below.

Sustainability metrics	Reported value	Unit
Scope 1 GHG emissions (Direct)	4,868	tCO <sub>2</sub> e
Scope 2 GHG emissions (Energy Indirect– Location-based)	6,939	tCO <sub>2</sub> e
Scope 2 GHG emissions (Energy Indirect– Market-based)	741	tCO <sub>2</sub> e
Total Scope 1 and 2 GHG emissions (Location-based)	11,808	tCO <sub>2</sub> e
Progress against Net Zero Carbon (NZC) Pathway target	1.9%	% difference
Total Group energy consumption in landlord spaces	52,549	MWh
Total Scope 1 and 2 GHG emissions intensity per floor area	18.0	kgCO <sub>2</sub> e / m <sup>2</sup> / year
Scope 3 GHG emissions selected categories:		
Category 1: Purchased goods and services	3,790	tCO <sub>2</sub> e
Category 2: New construction and other capital goods	8,611	tCO <sub>2</sub> e
Category 3: T&D and WTT losses	1,085	tCO <sub>2</sub> e
Category 5: Water and waste treatment	44	tCO <sub>2</sub> e
Category 6: Business travel	162	tCO <sub>2</sub> e
Category 7: Employee commuting, including homeworking	58	tCO <sub>2</sub> e
Category 13: Sub-metered utilities, & occupier-controlled utilities	12,191	tCO <sub>2</sub> e
Total landlord-obtained water	191,552	m <sup>3</sup>
Total waste collected	1,383	tonnes
Total non-hazardous waste	1,383	tonnes
Total waste recycled	802	tonnes
Total waste incinerated with energy recovery	581	tonnes
Proportion of waste recycled	58	%
Proportion of waste incinerated with energy recovery	42	%

To assess the Selected Information, which includes an assessment of the risk of material misstatement in the Report, we have used CLS’s “Sustainability Metrics: Scope, Boundaries & Methodology” (the “Criteria”), which can be found on the CLS website in the 2024 Sustainability Report [here](#).

We have not performed any work, and do not express any conclusion, on any other information that may be published in the Report or on CLS’s website for the current reporting period or for previous periods.



## Standard and level of assurance

We performed a **limited** assurance engagement of specified data and information using the 'Greenhouse Protocol – A Corporate Accounting and Reporting Standard' (revised 2015) and international assurance best practice including the International Standard on Assurance Engagements (ISAE) 3000 – 'Assurance Engagements other than Audits and Reviews of Historical Financial Information' (revised) issued by the International Auditing and Assurance Standards Board. To ensure consistency in our assurance process, we conducted our work in accordance with DNV's assurance methodology, Verisustain™, applying only the pertinent sections of the protocol relevant to the specific purpose of the activity. This methodology ensures compliance with ethical requirements and mandates planning and execution of the assurance engagement to obtain the desired level of assurance.

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO IEC 17029:2019 - Conformity Assessment - General principles and requirements for validation and verification bodies, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

The procedures performed in a limited assurance engagement vary in nature and are shorter in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained if a reasonable assurance engagement had been performed.

## Disclaimers

The assurance provided by DNV is limited to the selected indicators and information specified in the scope of the engagement. DNV has not conducted an assessment of the reporting organisation's overall adherence to reporting principles or the preparation of the Report. Therefore, no conclusions should be drawn regarding the reporting organization's compliance with reporting principles or the quality of the overall Report. The assurance provided by DNV is based on the selected indicators and information made available to us at the time of the engagement. DNV assumes no responsibility for any changes or updates made to the indicators or information after the completion of the assurance engagement.

## Our competence, independence and quality control

DNV established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV did not provide any services to CLS in the reporting period that could compromise the independence or impartiality of our work. Our multi-disciplinary team consisted of professionals with a combination of environmental and sustainability assurance experience.

## Inherent limitations

DNV's assurance engagements are based on the assumption that the data and information provided by CLS to us as part of our review have been provided in good faith, are true, and are free from material misstatements. Because of the selected nature (sampling) and other inherent limitation of both procedures and systems of internal control, there remains the unavoidable risk that errors or irregularities, possibly significant, may not have been detected. The engagement excludes the sustainability management, performance, and reporting practices of CLS's suppliers, contractors, and any third parties mentioned in the Report. We did not interview external stakeholders as part of this assurance engagement. We understand that the reported financial data, governance and related information are based on statutory disclosures and Audited Financial Statements, which are subject to a separate independent statutory audit process. We did not review financial disclosures and data as they are not within the scope of our assurance engagement.

The assessment is limited to data and information in scope within the defined reporting period. Any data outside this period is not considered within the scope of assurance. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Independent Limited Assurance Report.



### Basis of our conclusion

We are required to plan and perform our work in order to consider the risk of material misstatement of the Selected Information; our work included, but was not restricted to:

- Conducting interviews with CLS management to obtain an understanding of the key processes, systems and controls in place to generate, aggregate and report the Selected Information;
- Site visit to the Hygeia building in London, UK to review process and systems for preparing site level data consolidated centrally. DNV were free to choose the site on the basis of materiality in the overall portfolio;
- Performing limited substantive testing on a selective basis of the Selected Information to check that data had been appropriately measured, recorded, collated and reported;
- Reviewing that the evidence, measurements and their scope provided to us by CLS for the Selected Information is prepared in line with the Criteria;
- Assessing the appropriateness of the Criteria for the Selected Information; and
- Reading the Report and narrative accompanying the Selected Information within it with regard to the Criteria.

The initial scope of this Independent Assurance engagement included the sustainability metric “Total hazardous waste (tonnes)”. This metric was removed as there no data was available. We understand there may have been hazardous waste disposed of from sites, separately from the non-hazardous waste, but this is not tracked.

We found a limited number of non-material errors and these were corrected prior to inclusion in the Report.

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### For and on behalf of DNV Business Assurance Services UK Limited

London, UK  
31 March 2025

Holly Wallis-Copley  
Lead Verifier  
DNV Business Assurance Services UK  
Limited

Paul O’Hanlon  
Technical Reviewer  
DNV Business Assurance Services UK  
Limited



### Responsibilities of the Directors of CLS and DNV

The Directors of CLS have sole responsibility for:

- Preparing and presenting the Selected information in accordance with the Criteria;
- Designing, implementing and maintaining effective internal controls over the information and data, resulting in the preparation of the Selected Information that is free from material misstatements;
- Measuring and reporting the Selected Information based on their established Criteria; and
- Contents and statements contained within the Report and the Criteria.

Our responsibility is to plan and perform our work to obtain limited assurance about whether the Selected Information has been prepared in accordance with the Criteria and to report to CLS in the form of an independent limited assurance conclusion, based on the work performed and the evidence obtained. Our Independent Limited Assurance Report represents our independent conclusion and is intended to inform all stakeholders. DNV was not involved in the preparation of any statements or data included in the Report except for this Independent Limited Assurance Report.

### DNV Supply Chain and Product Assurance

DNV Business Assurance Services UK Limited is part of DNV – Supply Chain and Product Assurance, a global provider of certification, verification, assessment and training services, enabling customers and stakeholders to make critical decisions with confidence.