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London
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VP Marketing
SmartestEnergy
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23 October 2025

Scope 2 Carbon Footprint Verification Letter CERT-13869

Dear Liz,

Carbon Trust Assurance Limited (**'The Company'**) verifies that:

SmartestEnergy Ltd (**'You'**) has calculated the 5 Listed Carbon Footprints and marketed in the United Kingdom, in accordance with:

- Greenhouse Gas Protocol Scope 2 Guidance (2015);
- SmartestEnergy's Renewable Certificate Allocation Policy;
- SmartestEnergy's Electricity Certificates Procedures 1-10

Listed Products and Carbon Footprints

Verified Scope 2 Carbon Footprint Results

The Company verifies the Listed Carbon Footprints set out in the table below.

Product	Geographic Area	Emission factor (gCO ₂)	Functional Unit
Specific Renewable	United Kingdom	0	kWh
Natural Renewable		0	
Standard Renewable		0	
Conventional		476	
Total SmartestEnergy		196	

The Company verifies the above Listed Carbon Footprints based on the data provided in the following models: *Smartest Energy product emission factor model v1.3 2425 161025*

Verification Period

The verification Period to which the Listed emissions factors relate is as follows:

- Start Date: 1st April 2024
- End Date: 31st March 2025

Level of Assurance

This verification was carried out to a Reasonable Level of Assurance.

Materiality

It has been verified that all material non-conformities identified during the sampling performed on the footprint models submitted have been closed. If at any time and for whatever reason You or the Company identify any further non-conformities, the terms described in the Description of Service and General Terms and Conditions will apply. It is also Your duty to promptly inform the Company in writing.

Provision for material discrepancy

The Company has performed the verification in accordance with the applicable material discrepancy threshold: Where individual or the aggregate of actual errors, omissions or misstatements affect the final footprint result by the equivalent of 1% or more they are predetermined to be a material discrepancy and therefore a non-conformity.

Claim Period

The Claim Period for this Verification is a period of 12 months from 1st October 2025 (the “effective date”) until 30th September 2026. Subject to the provisions in this Verification

Letter, during the Claim Period you may communicate the Listed Carbon Footprint results as being valid in respect of representing the current Scope 2 Carbon Footprint(s) of the Listed Product(s).

We will be in touch with you prior to the expiry of this verification to discuss your communication plans as well as re-verification. However, if you have any questions please feel free to get in touch with us.

Verification Findings

The following findings were raised but considered suitable for continued action during the quarterly reviews and/or prior to the next re-verification audit. These are also detailed in the associated Assurance Report.

Identifier	Requirement	Planned action	Severity – Status
Finding 1	Document distribution list for the Smartest Energy Ltd “Renewable Certificate Allocation Policy” is outdated, and doesn’t include all of the names of people who should be on distribution (based on email communications to risk management committee on breach). This was identified in 2024, and in the quarterly review but has not been addressed.	Item has been noted and suspended for this verification period. Document distribution should be updated next year to include all members of the risk management committee identified in the finding during the quarterly review.	Minor non-conformity - Suspended
Finding 2	Smartest Energy Ltd did not provide evidence on the split of non-embedded vs embedded generation, and this has a potential impact on the conventional product and FMD. This was queried in 2024, and again in 2025, but was not answered, and evidence was not provided. Differences in these proportions may have an unknown impact on the calculation	This has been suspended, based on absence of clear requirements prior to engagement, but this year and should be addressed in next year’s certification with explanation and evidence.	Minor non-conformity - Suspended
Finding 3	Currently, the volumes associated with T&D losses are included in the calculations for the Conventional product. This means that the emission factor calculated represents both Scope 2 emissions and the T&D component from Scope 3 reporting. The same applies for the Total Smartest Energy calculations.	This OFI is persisting from last annual recertification and has not been addressed, Immaterial impact on the 2025 assessment period. However, SmartestEnergy and Carbon Trust should discuss how reporting could	Opportunity for improvement - Open

Identifier	Requirement	Planned action	Severity – Status
	The impact on the calculations for the 23/24 reporting period are immaterial for the Conventional product, though are more material for the Total SmartestEnergy calculation. GHG Protocol Scope 2 Guidance notes that emissions calculations may be impacted by regulations and reporting a total fuel mix in this manner is required by OFGEM.	be improved ahead of the next verification.	

Communications

You are permitted to communicate the verified results as set out below and in any associated Annex:

- 'The Scope 2 Carbon Footprint of this product has been verified by the Carbon Trust'.

Any communications, other than those listed above, shall be submitted to the Company for prior approval and may be documented in an Annex of this Verification Letter at the Company's discretion.

For and on behalf of
Carbon Trust Assurance Limited

A handwritten signature in black ink, appearing to read "M Hockaday".

Martin Hockaday,
Head of Assurance